

**Camden Council and Haringey Council response to  
Highgate Neighbourhood Plan  
(Pre-Submission consultation document – December 2015)**

The comments below are intended to help guide the Forum in the preparation of a plan that will be: in conformity with national policy and the strategic policies of the Councils' adopted and emerging Local Plans; appropriately positioned to provide additional local policies which are robustly evidenced; and judged to provide a sound basis, for use by the Councils, in planning decisions and coordinating area investment. The response includes input from relevant council departments. Haringey's comments are sent on behalf of Stephen Kelly (Assistant Director for Planning) who has delegated authority in this regard.

**Section 1 – General comments**

Structure and layout

Overall, the structure and layout of the document is clear, and sets out the vision and objectives well. The Boroughs note and appreciate that the Forum has taken on board their suggestion to set out policies and supporting text in a way that follows the format of their Local Plans. This makes the Plan easier to read and understand. It would be useful if the Plan included paragraph numbering to assist both the public and planning officers for referencing in applications and reports.

The Plan helpfully cites the NPPF in contextualising the proposed policies. For context and justification of the Plan's policies, the Forum is advised to refer to the relevant higher level policies (London Plan and Local Plans) in the supporting text. This will also help to avoid unnecessary duplication of these policies. Further, it is recommended to reference policies and guidance documents in the supporting text rather than the policy boxes, as policies/guidance documents can be replaced or titles/policy numbers can be changed over the plan period.

Basic Conditions and soundness

To assist in demonstrating conformity with the strategic policies, the Plan policies should briefly list each of the Boroughs' relevant adopted and emerging policies in the reasoned justification. The Forum may wish to refer the Kentish Town Neighbourhood Plan submission document as a good practice example of this approach. The Councils have suggested specific policy references in some instances however it is ultimately up to the Forum to determine which policies are the most relevant.

It is acknowledged that the Forum has prepared an evidence base to support the Plan. Further reference to this evidence throughout the document would assist in providing support and reasoned justification for the policies. It is noted that some policies do not currently have a reasoned justification and these should include such supporting text to justify the approach taken. This will all be particularly important to demonstrate soundness when the Plan is considered at examination.

The Councils consider that some of the Plan policies are overly restrictive or not worded in such a way as to meet the NPPF requirement for planning positively. We have highlighted this in the Section 2 notes, where relevant. There is also concern that the Plan sets onerous requirements for information that must be submitted with planning applications. NPPF paragraph 193 states that local planning authorities should only request supporting information that is relevant, necessary and material to the application in question. The Councils' current requirements are set out in [Camden's Local Area Requirements](#) and [Haringey's Validation Checklist](#) respectively. The Forum is encouraged to review these documents to help ensure consistency in this regard.

#### Next steps

Camden and Haringey strongly advise that the Forum shares a copy of the draft Plan (ideally including the draft SEA Report, Basic Conditions Statement and Consultation Statement) with the Councils prior to its formal submission. This will assist the Boroughs and the Forum in addressing any outstanding issues, particularly in respect of the Basic Conditions, and may reduce the likelihood for extensive modifications to the Plan at or after the Examination.

We also advise the Forum to seek an independent health-check from the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). This will provide assurance for the Forum and the Councils that the Plan is 'submission ready'. Further information is available on their [website](#).

#### Section 2 – Detailed policy comments

Reference	Topic	Borough Comments
<b>Section 2 Vision and Objectives</b>		
Sub-objective SO2.3	Economic activity	<p>"To increase local prosperity, achieved in part through greater mutual feedback between local businesses and residents"</p> <p>It is unclear how 'greater mutual feedback' might be achieved.</p>
Sub-objective SO3.3	Traffic and transport	<p>"To leave unaffected – or improve – the parking provision for Highgate"</p> <p>Perhaps 'maintain' would be clearer than 'leave unaffected'.</p> <p>Please note <i>improving</i> car parking provision is contrary to Camden's emerging Local Plan Policy (T2) which seeks car-free development. Increasing the availability of parking provision is also contrary to the overall thrust of the sustainable transport objectives and policies of Camden's adopted planning policies and the Camden Transport Strategy.</p> <p>It also seems to be inconsistent with responding to the challenges identified in 3.3.2 of the Neighbourhood Plan (e.g. I., III, V) and the first paragraph of Policy TR3.</p>
Sub-objective	Open spaces	<p>"To link Highgate's public spaces to educational, cultural, ecological and recreational uses"</p>

SO4.3		<p>Perhaps 'promote' would be clearer than 'to link'.</p> <p>We suggest adding 'environmental' to reflect the role that open spaces contribute to environmental sustainability (e.g. air cooling, flood prevention, pollution reduction etc.)</p>
Sub-objective SO4.7	Open spaces	<p>"To maximize public access to Highgate's open spaces"</p> <p>Optimise would be a more appropriate word than 'maximise' as this could be in conflict with the management objectives for some open spaces, e.g. if public access would harm their biodiversity value.</p>
Sub-objective SO4.6	Open spaces	<p>"To ensure the preservation and enhancement of Local Character, as defined in the NPPF"</p> <p>Is this a reference to the character of individual open spaces? If it is intended to be more general, it would fit better in the 'Development and Heritage' topic area. The cross-reference to the NPPF is not particularly helpful as the reader would need to search a separate document for this reference.</p>
Sub-objective SO5.1	Development and heritage	<p>"To guide the design and form of both new development and alterations to existing buildings and boundaries to preserve and enhance Highgate's conservation areas and ensure Highgate's rich archaeological history is recorded and, where necessary, preserved".</p> <p>The Plan can only influence alterations which are development. It's suggested the 'and alterations' is deleted.</p> <p>The sentence could be reworded to reflect the priority is to preserve and enhance the archaeological history, and where lost, ensure it is appropriately recorded.</p>
Page 18 – table	Basic conditions	This is very helpful and will be helpful to the Forum when it prepares its 'Basic Conditions Statement'.
Page 21	Housing	<p>'first time buyer housing'</p> <p>How is this being defined? The London Plan does not specify a target/requirement for first time buyer housing. The current direction of travel from central Government in this regard is for 'starter homes'.</p>
<b>Section 3 Plan-wide Policies</b>		
SC1	Highgate's housing needs	<p>Suggest replacing the term 'formats' with 'types and tenures'.</p> <p>SC1 I. Haringey supports referencing to SP2. To clarify, SP2 sets a Borough-wide target for large sites (over ten units) and for smaller sites (below ten units), a target of 20% affordable housing units on-site or provision of financial contribution.</p> <p>SC1 II. This policy overlaps and potentially repeats the emerging DM15 (B). Further local evidence may be required to support an additional neighbourhood level requirement. It is important that the Plan makes clear that the policy's implementation does not compromise the ability of the Councils to meet more conventional housing needs as</p>

		<p>required by the NPPF. Conventional housing (including affordable housing) will ultimately take primacy over specialist housing in terms of delivering on Local Plan objectives.</p> <p>SC1 III. This paragraph is quite unclear in its intention. Not clear what 'managed' HMOs mean. In the Neighbourhood Area, conversion of houses to small HMOs (3-6 people) is permitted development, while conversion of a house to a large HMO (more than 6 people) requires planning permission. HMOs may be required to be licensed to ensure an appropriate standard of management and quality.</p> <p>'Adequate size' – this is ambiguous. Space standards for housing are set out in the London Plan, and policy will be required to be in conformity with these standards.</p> <p>In prioritising self-build and custom build housing, the Plan should demonstrate evidence of local need and identify sites where such need can be met in order to satisfy the NPPF requirement of meeting objectively assessed need. For the Local Plan, evidence is currently being gathered on behalf of London Boroughs by the GLA through the self build housing register.</p> <p>The supporting text would benefit from additional detail of local evidence to support the policy. Suggest referring to Haringey's Housing Strategy and local SHMA as indication of different types of housing need, including housing for older people. LB Camden will be publishing its housing needs evidence (SHMA) on Monday 8 February when it starts consultation on the submission draft version of the Local Plan.</p>
SC2	Community facilities (and Appendix 1 CIL list)	<p>It is recognised that the Forum has taken on board the previous recommendations for the NP policy to draw clearer links to the Community Infrastructure Levy and creation of a CIL priority list. However, the current policy wording is slightly misleading as it implies that developers should contribute to delivering provision as set out in the CIL list. The policy should be revised to reflect that CIL will be required on qualifying development, and that the Forum suggests its CIL allocation is used for provision as outlined in the CIL list (Appendix 1), in line with the Councils' agreed approach to CIL spending. Camden is likely to prioritise projects which align with Camden Plan objectives. The long-term revenue implications of projects are also an important consideration.</p> <p>In addition, the NP needs to reflect that CIL will only be spent on infrastructure consistent with that set out in relevant legislation. See <a href="#">National Planning Practice Guidance</a> for further information on relevant legislation.</p> <p>It is understood the CIL list in Appendix 1 is in draft format and has been prepared as part of the Forum's consultation. Once finalised, the CIL list should ideally prioritise projects. This will ensure that the spending of CIL receipts is carried out in a</p>

		<p>clear and transparent way.</p> <p>Figure 3 sets out Highgate's community facilities. The map includes care homes &amp; assisted living and restaurants, uses which are not normally considered community facilities in higher level policy (i.e. they are not specified as social infrastructure within the London Plan or Haringey's Local Plan). Whilst recognising the contribution these uses make to supporting sustainable communities in Highgate, provision may be more appropriately addressed through other sections of the plan (for example, policies on housing and town centre development). The NP would benefit from a definition of community facilities to assist with policy implementation, and the Forum may wish to draw on the definition set out in the NPPF. The diagram could show the swimming ponds at Hampstead Heath as a sports facility.</p> <p>Final paragraph of the supporting text should clarify that this is subject to a need being generated.</p>
SC3	Allotments and communal open space	<p>There are a number of terms included in this policy (allotments, community garden space, communal garden land, open space and communal open space). It is not clear whether these terms are to be considered independently or used interchangeably. It is recommended that the terms are clearly defined in the supporting text. Where the policy is dealing with different types of provision, it would assist the reader if requirements were separated by bullets.</p> <p>The policy sets out that development should provide new allotments or communal garden land, in line with Haringey's SP13 and Haringey's Open Space and Recreational Standards SPD. However, Haringey's adopted and emerging Local Plan documents, whilst protecting against the loss of allotments, do not specifically require such provision on new development. The policy should be amended to appropriately reflect this.</p> <p>The policy objective to protect existing allotments and to encourage development of new allotments and communal open land is supported in principle. The Plan would benefit from setting out further information on the development that would trigger requirements for new provision (e.g. site size or development type).</p>
EA1	Highgate Village Core	<p>EA1 seeks to reconcile Haringey and Camden Borough town centre policies to create a consolidated NP policy for the Highgate Village Core. The policy should establish the boundaries of the Village Core and identify the shopping frontage where the policies will be implemented. The Forum is encouraged to use those boundaries designated within Boroughs' town centre hierarchy. Highgate Village is designated as a Local Shopping Centre in Haringey and a Neighbourhood Centre in Camden - these designations should be retained to ensure conformity with the Councils' strategic policies.</p>

		<p>The policy seeks to manage the proportion of uses in Highgate Village. The NP does not specify where the uses will be managed; it is recommended that the plan is revised to reflect that the policy will apply to designated shopping frontages. Further, it is not clear whether the objective is to ensure A1 uses comprise a minority or majority of uses within the Village. The 45% threshold needs to be further clarified in this respect. The Forum may wish to refer the Boroughs' current and emerging policies for guidance with phrasing this policy criterion.</p> <p>The Council assumes the intention is to ensure that the majority (55%) of uses in the Village are in A1 use. This approach is not in conformity with Haringey's adopted and emerging policies, which seek to ensure that the overall number of units in Local Shopping Centres in non-retail use do not exceed 50% across the designated shopping frontage. Haringey has no in principle objection to a local variation in the NP. However there should be a clear rationale for this approach in the supporting text and it must be justified by evidence. There is also a question as to whether the 55% A1 threshold is deliverable. The Forum's own evidence suggests that the 43% (36 of 84 units) are in A1 use; to bring this up to 55% (46 of 84 units) an additional 10 units in A1 use would need to come forward through change of use. The policy may adversely impact on town centre vitality and viability by restricting opportunities for non-retail uses to come forward.</p> <p>Second paragraph – loss or change of use of B class uses; is there relevant evidence relating to the loss or availability of B class floorspace to justify the policy?</p> <p>Second paragraph - retail impact assessments are required in line with the NPPF (for larger schemes above a threshold of 2,500 sq m). The policy could be rephrased to state that proposals will be assessed having regard to their impact on town centre vitality and employment opportunities.</p> <p>The supporting text sets out aspirations for relocating the 271 bus stand. There should be a corresponding policy to link with this part of the supporting text (i.e. "Forum will support Transport for London in exploring options for potential alternative locations for the bus stand"), or this could be incorporated into the section on 'Related non-statutory economic activity actions'.</p>
EA2	Archway Road	<p>Suggest replacing 'presumption to retain' with 'promote' to ensure clarity.</p> <p>The NP policy should reflect Haringey's adopted and emerging policy for Archway Road Local Centre (i.e. within designated frontage a minimum of 50% of units in A1 use). If a local variation is proposed, this would need to be justified and supported by evidence.</p>

		<p>Policy EA2 and corresponding Table 3 (Archway Road) appear to seek the extension of the designated Local Shopping Centre up the length of Archway Road. This is not in conformity with the designation set out in the Council's adopted and emerging plans. Furthermore, the NP proposes to include 460 Archway Road within the 'Commercial Core – Stretch 4'. This is also not in conformity with the Council's emerging Local Plan, as Policy SA38 (460-470 Archway Road) sets a specific site allocation for residential and employment use. In terms of plan making procedure, changes to a local centre boundary should be set out through a site allocation and justified by a retail study quantifying demand and supply.</p> <p>There are permitted development rights for change of use from A1/A3 to other uses which may affect the deliverability of the policy objectives.</p>
EA3	Aylmer Road parade	<p>The wording of this policy is unclear and may be difficult to interpret and implement. If the principle is to protect the shops units for small buildings and workshops etc, and to protect the streetscape, we suggest that the policy discourages amalgamation of individual units in order to protect small and independent businesses, and preserve the streetscape. An example of this approach can be seen in the draft Tottenham AAP Policy SS1. Additionally, if the policy aims to control uses it is recommended to set thresholds for preferred uses, where this can be supported by local evidence.</p> <p>Wording - 'unless lack of demand can be demonstrated' requires supporting text to ensure clarity.</p>
Table 2, page 32	EA: Economic Activity	Data relating to the mix of uses in Highgate Village is welcomed.
3.3.1 2 <sup>nd</sup> para.	TR: Traffic and Transport	Refers to the fact that serious collisions and deaths are common on the key corridors of Archway and Highgate Hill. This is not borne out by statistics held in Camden – there were no fatalities on Highgate Hill (down to the gyratory at Archway station) in the three years to August 2015. There have been 4 serious injuries in 3 years.
Page 36	TR: Traffic and Transport	<p>"The Plan area is physically different, being hilly and benefitting from many large open spaces. It also has a different demographic and (as a whole) a lower density of housing. It also has a wide range of street and property types from the mansions for the wealthy to public sector housing in need of attention".</p> <p>It is understood that these are distinctive characteristics of Highgate but the text doesn't explain how these factors justify a bespoke set of transport policies for the neighbourhood area.</p>
TR1	Movement of heavy goods	TR1 I. A construction management plan is required as part of the conditions to be approved, so this requirement is too onerous as part of an application. If a planning application is amended this could impact on the CMP, so it is more appropriate that this is part of the conditions once an application is approved. In the case that an application is

		<p>refused, a CMP would then be an unnecessary burden. It would be helpful to cross-reference to Camden Planning Guidance 6 – Amenity supplementary document which explains how Camden Council uses ‘Construction Management Plans’.</p> <p>TR1 II. ‘any damage caused to the public realm’ is too vague and would be difficult to implement. It would be difficult to prove damage done by any specific construction vehicles. This would not meet the criteria for s106.</p> <p>TR1 V. Refers to ‘cleaning roads of building related waste’ – this is addressed as part of a Construction Management Plan. Would be worth mentioning the servicing and delivery guidelines set out in Camden Planning Guidance 7 – Transport supplementary document in the supporting text.</p> <p>Pg 37 - Last paragraph: ‘planning approval is often granted without regard to how the works will be carried out’. The Councils require CMPs and delivery and serving plans for all larger developments.</p> <p>Pg 38: second para: ‘Developers may also be required to contribute to public realm improvements once work has been completed’: such works may also be undertaken in parallel to a development, e.g. planting of trees.</p> <p>Page 38: Third paragraph: ‘Sites that are likely to generate such traffic should be required to make provision for them on their land’. This statement should be qualified by ‘where possible’ as it will not be achievable in all cases.</p> <p>‘in effect pushing the problem onto public space <i>will not be approved</i>’ should be changed to ‘... will be resisted’</p>
TR2	Minimising the impact of traffic arising from new development	<p>I. ‘transport networks’ should this focus on walking and cycling connections?</p> <p>Suggest removing reference to Camden CPG in main policy text as these documents may change - neighbourhood plan policy should be able to stand on its own.</p> <p>III. The wording of this policy is unclear and vague. Suggested re-wording: ‘Developments should provide appropriate arrangements within the site for pick-ups, drop offs and waiting areas for taxis, private cars and coaches to ensure safe access for the site users, as well as other users around the site, and to reduce congestion.’</p> <p>Is this policy specifically in relation to schools, as suggested in the first paragraph on pg 39? It would be helpful to set out what the precise concern is.</p>
TR3	Improving	The title’s reference to ‘Improving parking’ suggests



	parking in Highgate	<p>increasing parking provision, extending hours of use or removing restrictions whereas the policy seems to be addressing the impact of development.</p> <p>General comment – The wording is difficult and not straight forward, suggest rewording the policy to read positively. E.g. ...would be supported if: ensures highway safety and pedestrian movement; provides adequate sightlines...etc’.</p> <p>First paragraph – ‘Where practical, development will be expected to be car-free in areas that are designated as a Controlled Parking Zone...’ this is supported by Camden as it is consistent with adopted policy.</p> <p>‘regarded as accessible by public transport’ this is vague. Suggest rewording to read ‘well served by public transport.’</p> <p>‘Development should not have any negative impact on existing parking’ / “Private residential developments of a plot....” / ‘create a shortfall of residential parking’ / ‘The restrictions on cars need not apply to residential developments in those few roads where the majority of houses have substantial off-street parking’: LB Camden would generally seek opportunities through development schemes to remove surplus on-site car parking, resist additional car parking that has a harmful visual impact (as in III) or improve sightlines (as in II) where this is necessary in these areas.</p> <p>TR3 IV – there are no standards for coaches and taxis so this would not be implementable.</p> <p>TR3 VI - be clear what is meant by ‘harmful visual impact’.</p> <p>TR3 VII – be clear what is meant by ‘significant contribution to the visual appearance of the area’. You may wish to refer Camden Policy DM19 for wording in this respect.</p> <p>Final paragraph of policy – Camden’s LDF was adopted in 2010. Camden Council now only supports car clubs and pool car schemes in areas which are not easily accessible by public transport. Camden is already well provided with car club vehicles and we want to encourage trips by more sustainable modes of transport (especially walking and cycling). With regards to future provision of both car club bays and electric charging points, the Council is generally not seeking further provision until demand increases (although if car parking is deemed essential electric charging points may be sought).</p> <p>Page 40, last paragraph: Please note that there are parking restrictions throughout the Neighbourhood Area. These operate Monday – Friday 10am – 12pm in order to deter all day commuter parking. Parking restrictions can be reviewed and could be reviewed as part of changes to operating hours of CPZ in adjoining boroughs.</p>
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		<p>'Where practical development will be expected to be car-free in areas that are designated as a CPZ and regarded as accessible by public transport' – This is not entirely in conformity with Haringey's emerging policy DM32.</p> <p>Page 41, last sentence, second paragraph: 'will be expected to be car free'. Even where the Boroughs' policies provide for very limited car parking, there remain requirements to ensure suitable provision for disabled parking and servicing.</p>
TR4	Promoting sustainable movement	<p>The Forum may wish to elevate this policy to the lead policy for the section, as it deals more strategically with sustainable transport and sets a context for the other policies in the transport section.</p> <p>Comments car clubs/pools and electric charging points made under Policy TR3 above.</p> <p>'On site and off site, all new developments will be required to contribute where appropriate to enhancing the connectivity of the Plan area through the provision of new and improved cycle links, bike parking facilities, footpaths, public transport stops and new through routes'. This will also be subject to viability in accordance with NPPF paragraph 173 – 'Ensuring viability and deliverability'. Therefore, we suggest saying: subject to viability.</p>
TR5	Dropped kerbs and cross-overs	<p>It should be noted that most dropped kerb and cross-over applications are dealt with under the Highways Act and do not require planning permission. Planning permission is however required for changes to a front boundary. There is guidance on Camden's assessment criteria on the Council's <a href="#">website</a>. There is some overlap and potential repetition of Haringey's emerging DM33 and DM34. The Forum may wish to consider whether it is necessary to duplicate higher level policies.</p> <p>TR5 I: The wording 'areas of high parking stress' should be further clarified. Haringey does not define areas of high parking stress. If included in the NP, these should be defined/mapped (and supported by clear evidence) or it may be preferable to reference CPZ to ensure a clear mechanism for implementing the policy.</p> <p>II. "not negatively impact on the character of a conservation area" – suggest this says 'character of the area, particularly conservation areas': as the policy's objective is relevant to the whole plan area</p> <p>It is unlikely that the Councils could attribute off-site flooding to one additional parking space in isolation. We suggest criterion IV. refers to the cumulative effects of multiple off-street parking schemes on flood risk (from the paving over of front gardens) to strengthen the policy. This criterion could also refer to achieving run off rates which are no greater than</p>

		<p>the existing situation, and wherever possible are reduced. You may consider including a policy requiring permeable surfaces for car parking areas, which may suitably address the issues covered here more succinctly.</p> <p>The supporting text for IV. could refer to this being achieved through implementing appropriate Sustainable Drainage Systems (SuDS) which allow water to soak into the subsoil, rather than being diverted into the stormwater system.</p> <p>Page 44, first paragraph – update reference from TR7 to TR5 (twice in paragraph). Last line, instead of ‘investigated’ insert ‘considered’.</p>
OS	Page 45	<p>Core Objectives – ‘maximum benefits’ from Highgate’s open spaces. Generally it will be desirable to seek a range of functions and benefits from larger open spaces, but for some spaces maximisation may not be desirable and there can be conflicts between social/economic/environmental objectives, particularly in terms of delivering the Boroughs’ respective spatial strategies. Perhaps this should be qualified by saying where this does not harm an open space’s existing character or integrity.</p>
OS	Pages 45-47	<p>It is unclear why there are different shades of green in Figure 9.</p> <p>Mayor’s ‘Great Outdoors’ programme – may also be worth referring to the ‘All London Green Grid’ strategy and the Green Infrastructure Task Force Report.</p> <p>It would be helpful for the Examiner if ‘Appendix 2’ could be briefly summarised in an appendix to the Neighbourhood Plan itself. If it is separate to the plan, it might be appropriately referred to as an evidence paper.</p> <p>‘green screen’ – is this a visual amenity in itself?</p>
OS1	Fringes of Highgate’s open space	<p>General comments – for clearer understanding of this policy for applicants and Planning Officers, it would be helpful if a further explanation is given regarding the extent of the ‘Fringes’.</p> <p>Suggest rewording policy to ensure that it is positively responding to development.</p> <p>‘Major open spaces’ is not a recognised designation. Suggest that the supporting text identifies the designated open spaces and refers to planning framework to ensure consistency and compliance. Some of the fringes are ‘Metropolitan Open Land (MOL)’ where an even stricter approach to policy is applied – supporting text should include brief cross-reference to London Plan and local planning policies for MOL.</p> <p>OS1 II. ‘sense of enclosure’ – it is unclear whether enclosure universally detracts from the quality of relevant conservation</p>

		<p>areas. Would any increase in the sense of enclosure be damaging in all cases?</p> <p>This paragraph implies that the entire Neighbourhood Area is a Conservation Area. Suggest amending for clarity.</p> <p>OS1 III. For clarity refer to Camden and Haringey's policies maps. Be clear in supporting text which views or proposals maps the policy refers to.</p> <p>OS1. IV - While planning policy can be used to seek the retention of trees in a proposed development (where they are of significant amenity, heritage, biodiversity or townscape value), the Councils will not seek to protect all trees – particularly if they are poor quality specimens.</p> <p>Where trees in a conservation area are not protected by a TPO, section 211 of the Town and Country Planning Act 1990 applies. Prior to carrying out work affecting such trees, the owner is required to give the council six weeks notice. This notice period gives the authority an opportunity to consider whether to make a TPO on the tree. The work may go ahead before the end of the six week period if the local planning authority gives its consent.</p> <p>NPPF, para 118, and London Plan Policy 7.21 sets out protection criteria for trees. Is there evidence to show local circumstances justify a different approach?</p> <p>OS1.V - The meaning of 'subservient to the natural and open landscape...' is not clear and the Plan should provide further detail in this respect. Reference should be made in drafting the policy to London Plan 7.4 Local Character as this sets the framework for development adjacent to open space. It would be helpful if the supporting text briefly set out how this policy should be interpreted, e.g. development which is detrimental to the integrity, appearance or setting of the open space in terms of height, scale, massing, use of materials or function.</p>
OS2	Protection of trees and mature vegetation	<p>The NPPF states that planning permission should be refused for development resulting in the "...loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss." London Plan Policy 7.21 states 'Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.' Is there evidence to demonstrate local circumstances which require a stronger approach on tree protection than that set out by higher level policies?</p> <p>The reference to 'public benefit' is unhelpful as it is open to misinterpretation. Suggest replacing with the Councils 'will</p>

		<p>expect trees with....to be retained'. The evidence submitted to accompany the planning application will normally set out why individual trees or vegetation have not been retained.</p> <p>The reference to replacement planting in the second paragraph repeats the first paragraph.</p> <p>Minor re-wording is needed to the sentence "All developments will be required to demonstrate how they will preserve or enhance the open and/or semi-rural character of Highgate" – this is not likely to be relevant to all types of development. It is suggested this changes to "Development will be expected to preserve or enhance..."</p> <p>A Conservation Area Notice can provide additional consideration for tree preservation, but does not necessarily prohibit works to trees.</p> <p>Permission to undertake works to trees is generally not required unless a Tree Preservation Order (TPO) is in place.</p> <p>Haringey's 'Validation Checklist' sets out the requirement for an arboriculture impact assessment to be submitted where tree works are involved. Camden Council requires a tree survey and arboricultural statement if there are trees within the application site or on adjacent sites including street trees.</p> <p>The Councils suggest the Forum consider identifying and mapping a local green grid, building on the All London Green Grid and Boroughs' Biodiversity Action Plans, to set a basis for the active management of green infrastructure, including trees, in the local area.</p> <p>The policy is silent on the planting of new trees and vegetation and could usefully address this.</p>
OS3	Local green space designation	<p>We commend the Forum on preparing this comprehensive piece of technical evidence on green space.</p> <p>Haringey notes that the proposed designation of the open land at Hillcrest as a Local Green Space is not in conformity with Haringey's emerging Site Allocation SA44. The NPPG sets out guidance on the designation of LGS to ensure it is consistent with local plans <a href="#">National Planning Policy Guidance</a>.</p> <p>The remaining identified LGS within Haringey have existing open space designations as follows: Southwood Lane Wood (SINC), Aylmer Road Open Space (MOL); and protection of allotments under London Plan Policy 7.22 and SP13: Highgate Allotments, Shepherd's Hill Railway Gardens Allotments; Aylmer Allotments. The Forum should consider the merit of proposing this additional designation to these already designated open spaces, which the Council will protect through the Local Plan. Please see the NPPG for further guidance on this issue National Planning Policy Guidance.</p>

		<p>LGS is a stronger designation than SINC; there would be merit in the Forum identifying this.</p> <p>Suggest adding some text ahead of the list of LGS to set a context for the designated LGS.</p>
OS4	Biodiversity and ecological corridors	<p>Should there be a map of the corridors? It would be helpful to note that strategic ecological corridors are already designated on the Councils' Policies Maps and development is already restricted within these spaces.</p> <p>The requirement seeking locally indigenous species in new landscaping is supported.</p> <p>Surveys are required according to (likely) nature conservation value. Developers must undertake a protected or priority BAP species survey when desktop surveys show these species are likely to be present.</p> <p>Camden Planning Guidance sets out specific 'triggers' (for when surveys are needed) and 'exceptions' (when they are not needed), e.g. the Council may agree that no survey is required because it is already clear that protected species are not present.</p> <p>Haringey's Validation Checklist sets out the requirement for biodiversity surveys and reports.</p> <p>Camden requires desk study and site walkover surveys for all major developments to identify the ecological characteristics of the site and any significant impacts from development. These can be used by the applicant and Council to establish if further ecological surveys are necessary and need to be submitted with any planning application. As worded, the policy pre-supposes that surveys will be needed in a broader range of circumstances than would be reasonable to do so.</p> <p>The policy should qualify that surveys will be required in appropriate circumstances in accordance with the Council's guidance. The supporting text could then identify the titles of the relevant guidance, e.g. Camden Planning Guidance 3 Sustainability supplementary document, or similarly signpost to Haringey's Validation Checklist.</p> <p>It is unclear what might be included in a 'basic ecological survey' and the requirement for a "full season long professional ecological survey" is unlikely to be necessary in some instances. All surveys must be carried out by a suitably qualified and experienced person including desktop surveys. To avoid confusion with existing planning guidance or duplication of evidence, the final para. of 51 should be deleted.</p> <p>Unclear why '...and local authority funded landscaping' is specified? This would be covered in new developments and public realm.</p>

DH	Figure 11	It would be helpful if the individual Conservation Areas were labelled on the map.
DH1	Demolition in Highgate's conservation areas	<p>This policy does not appear to have been significantly revised from the Policy DH1 included in the first pre-submission draft NP (January 2015) which the Councils provided detailed comments at that time.</p> <p>The principle of keeping locally listed buildings and those which contribute to conservation areas is welcomed. The use of the phrase 'exceptional circumstances' would be better replaced with wording similar to the tests of the NPPF (see paragraphs 132-134), which set out national policy on proposals involving 'substantial harm' to or 'loss' of heritage assets, as well as 'less than substantial harm' to.</p> <p>The Councils' adopted and emerging policies are considered to be as strong on this issue as the NPPF allows.</p> <p>It is suggested that the paragraph 3.5.1 (first paragraph, fourth sentence) refers to 'heritage assets' rather 'heritage' to better set the context for managing development.</p>
DH2	Development proposals in Highgate's conservation areas	<p>The requirement for and phrase 'short statement' should be clarified. This would not be required where the applicant already needs to submit a 'Design and Access Statement' or 'Heritage Statement'.</p> <p>Haringey notes that the CAMPs do not set requirements for planning statements as indicated by Policy DH2; rather they set out as a principle for development management, that the Council will require 'Design and Access' or 'Heritage Statements' to have regard to, where appropriate.</p> <p>The Plan policy supporting text could usefully refer to Haringey's Validation Checklist and emerging Policy DM9(B) which set out relevant requirements for planning statements.</p> <p>In Camden a 'Heritage Statement' is required for all listed building applications; applications for the substantial or total demolition of a building in a conservation area, applications for works to buildings on the local list and applications for works affecting the setting of a listed building or conservation area. It is expected to provide information on matters including the significance of the heritage asset affected by the development, including any contribution made by its setting and the principles and justification for the proposed works and whether any steps are to be taken to avoid or minimise any impacts. Full details are set out in Camden's Local Area Requirements (Section 3).</p> <p>The heritage statement information can be included as part of the 'Design and Access Statement' where one is required; if there is not a requirement to submit a Design and Access Statement then the Heritage Statement should be provided as a separate document.</p>

		<p>The second paragraph of DH2 is considered to be overly prescriptive in terms of materials (i.e. non-renewable materials are not permissible). However, it is acknowledged that uPVC is resisted in conservation areas as a matter of course. Materials should be considered having regard to their impact on the significance of heritage assets and their setting.</p> <p>While we support the desire to control the painting or rendering of exposed brickwork, this is normally permitted development and not something the Local Planning Authority is able to control through the planning process. Permitted development rights are also likely to be relevant to some of the other characteristic elements mentioned in this policy, e.g. 'original building materials'. To avoid unnecessarily raising expectations over what the planning system is able to control, there should be reference to 'permitted development rights' in the supporting text to this policy.</p> <p>Rather than focusing only on satellite dishes, the policy may benefit from broadening its scope to address telecommunications equipment (covering satellite dishes but also other apparatus that could impact on local character).</p> <p>The NPPF broadly supports telecommunications in delivering sustainable development. Haringey's emerging DM policies (e.g. DM3 and DM9) are considered to provide an appropriate basis for managing telecommunications equipment. NP Policy DH2 is not sufficiently flexible to allow this type of development to come forward (i.e. satellite dishes not acceptable where they are visible from the street).</p>
DH3	Rear extensions	<p>The policy would benefit from clarification as to whether it applies to all extensions or residential extensions.</p> <p>Suggest revising policy (second sentence) to read 'Rear extensions should be subordinate in scale to the original dwelling' rather than 'to the main house'. This will ensure due consideration is given to the cumulative impact of development proposals.</p> <p>You may also wish to refer to development respecting and preserving existing architectural features (e.g. projecting bays, decorative balconies or chimney stacks) and the historic pattern and established townscape of the surrounding area.</p> <p>In terms of a 'significant area of garden', the Councils suggest clarifying that this is proportionate to that of the surrounding area, including neighbouring properties.</p> <p>Haringey's emerging policies DM1 and DM12 set out requirements on residential extensions, which the NP could usefully reference in the supporting text.</p>
DH4	Side extensions	<p>To bring this policy in line with the NPPF, it is suggested that it is more positively worded (i.e. to set out that proposals for</p>



		<p>side extensions should be sensitive to and respect the character of the streetscape, having regard to the spaces between buildings where these contribute to the character of the local area).</p> <p>We suggest stating that side extensions should follow the general principles set out for rear extensions in DH3.</p> <p>Haringey's emerging policy DM1 and DM12 set out requirements on residential extensions, which the NP could usefully reference.</p>
DH5	Roofs and roofscape	<p>DH5 seems overly prescriptive in setting out that "roof extensions and dormers will rarely be acceptable on front or other prominent elevations". The NP is silent on situations where this type of development would be acceptable. Similar to comments in DH3 and DH4, the policy could be more positively worded with a focus on ensuring proposals are sensitive to and respect the character of the streetscape, including roofscape.</p> <p>DH5 sets out that chimneystacks should always be retained. The policy would benefit from a qualification that proposals should seek to retain chimneystacks where they positively contribute to the character of the local area, otherwise this seems an onerous requirement.</p> <p>The supporting text should refer to Camden Planning Guidance 1 – Design supplementary document which provides much more detailed advice on the circumstances in which dormers are/are not likely to be acceptable. E.g. they may well be acceptable where the alteration is being made to a group of buildings and where the continuing pattern of development would help in 'reuniting' a group of buildings/townscape or where an established pattern exists of a variety of additions and alterations to roofs. Conversely, a dormer is likely to be unacceptable if the development involves a complete terrace or group of buildings where the roof line is largely unimpaired by alterations or extensions.</p> <p>Haringey's emerging policy DM1 and DM12 set out requirements on residential extensions (including for roofs and external features) which the NP could reference.</p>
DH1-5 and 7	Reasoned justification	<p>These policies have no reasoned explanation/supporting text. It is suggested that each policy in the plan should have a brief reasoned explanation/supporting text directly underneath the main policy text.</p>
DH6	Front boundaries	<p>To ensure the policy is flexible we suggest replacing 'will only be acceptable' with 'should'. The policy could identify specific areas and link to Conservation Area Management Plans.</p> <p>Permitted Development rights are likely to affect the delivery of this policy.</p> <p>The NP could set out a policy to manage walls, so as to</p>

		ensure that they do not extend beyond permitted development heights.
DH7	Shopfronts	<p>Permitted development rights are likely to affect the delivery of this policy.</p> <p>Haringey's emerging Policy DM8 includes relevant requirements which the Plan could usefully reference.</p>
DH8	Basements	<p>The policy requires the 'maximum evidence' for all basement schemes irrespective of its potential impact. This is likely to be contrary to NPPF paragraph 193. The evidence which the Councils require relates to the likely impacts of each individual scheme.</p> <p>The policy also contains provisions relating to the Party Wall Act which are outside of planning legislation and cannot be used as a basis for refusing a planning application.</p> <p>'Section 1 'Enhanced Basement Impact Assessment (BIA) requirements':</p> <p>This is not policy, rather guidance for a BIA. It presupposes that a basement has impacts and that soil sampling will always be necessary. Data collected should be appropriate to determine the risk of basement development rather than standardised for all basements, where the design, size and ground conditions vary for each scheme. Camden Council's BIA process for example is structured to identify risks and collect information related to these risks.</p> <p>Section 2 I. 'Notwithstanding...' – The Councils suggest rewriting this to encourage rather than require a condition survey. It is not a material planning consideration as it is a matter regulated by other legislation (the Party Wall Act).</p> <p>II. "A suitably qualified engineer will be appointed..." This is unlikely to be a reasonable requirement to apply for all basement schemes, as it is not likely to be needed for minor works. Camden Council require a Basement Impact Assessment to be undertaken by a qualified firm, and for this to be independently verified by engineers appointed by the Council and paid for by the applicant. Similar requirements are also set out in Haringey's emerging Policy DM18. If monitoring is required it will be identified through this process.</p> <p>III. 'A Construction Management Plan (CMP)..." Construction management plans and basement construction plans should not be required for all schemes as they would be unnecessary for some basement works.</p> <p>V. "All BIA, CMP and BCP issues must be resolved..." The need for CMPs and BCPs to be provided 'at planning stage' depends upon the impacts of the scheme. The Councils advise that the policy should state they will be required where this is justified by the impact of the development. Basement construction plans are likely only to be required in a minority of</p>

		<p>cases. These plans are generally secured through Section 106: it may not be practicable to resolve all of the issues within these documents prior to determination, e.g. it would not be reasonable for the Council to refuse permission because a minor part of a CMP was not yet resolved (and it would be possible to do so after determination).</p> <p>3. "Limiting Environmental/Ecological Impacts"</p> <p>Criterion (I) - Camden Council support criterion (I) as this aligns with our draft Local Plan policy.</p> <p>Criterion (II) – It is assumed this is referring to S106 but use of the word levy suggests standard payment terms. Application of a specific levy would not be legal. If intended as a planning obligation, this would need to meet the definition for use of obligations and tests set out in legislation.</p> <p>The Councils already seek highways contributions to make good any damage through a planning obligation agreement or Section 278. Any money not spent is returned to the applicant. This process is well established and is considered to already address the issue identified by the Forum.</p>
DH9	Refuse storage	<p>Any specific requirements that a planning application would be expected to meet should be included in the policy – the Neighbourhood Plan should not refer to meeting guidance in Supplementary Planning Guidance in order to obtain planning permission. The SPD and Appendix may however be referenced in the supporting text to provide advice to the applicant on how they might respond to the policy.</p>
DH10	The environmental health of future residents	<p>The policy should be expanded to provide protection not only for future residents, but also existing ones.</p> <p>Whilst the NP policy is focussed on key transport corridors, the Councils' development management policies will apply across the Neighbourhood Area. As such, the Forum may wish to revise the policy slightly to set out that particular attention will be paid to the identified locations (rather than only those locations).</p> <p>Haringey's emerging policy DM23 (Environmental protection) sets out requirements on noise and air pollution, along with other environmental health considerations, which the NP could usefully reference in the supporting text. In Camden air quality and noise impact assessments are required in accordance with the Council's own 'Local Area Requirements'.</p>
DH11	Backland development	<p>There are multiple planning issues addressed here and the policy would benefit from some restructuring in order to clarify key objectives and relevant requirements. There seem to be two key policy objectives in DH11 – to set a presumption against back garden development and to establish local criteria to manage proposals on backland sites (including for biodiversity, landscaping, sustainable drainage, layout and</p>

		<p>design, density, height and character).</p> <p>On the first issue, the policy that “Development in back gardens will not normally be permitted” conflicts with the NPPF presumption in favour of sustainable development – as worded it suggests extensions, conservatories, studios and basements are unlikely to be allowed.</p> <p>The supporting text provides that Haringey has no strategic policy in place to protect back gardens against development. Haringey’s emerging Policy DM7 (Infill, backland and garden land sites) sets out a presumption against the loss of garden land along with further requirements for proposals on infill and backland sites, and where appropriate, garden land. It is considered that a blanket restriction on back garden development does not provide sufficient flexibility to allow opportunities for comprehensive development schemes to come forward (e.g. where these would address other strategic plan objectives, whilst also providing a layout consistent with surrounding character and amenity). The Forum is encouraged to consider whether the NP objectives on this issue are sufficiently addressed by the Councils’ existing and emerging policies, and if DH11 addresses NPPF requirements to plan positively.</p> <p>On the second issue, there are some concerns with the requirements listed.</p> <p>DM11.I - The retention of a tree may not be sufficient to ensure its long-term survival. The criterion could briefly refer to the importance of development proposals allowing sufficient space above and below ground to prevent damage to root systems and to facilitate future growth. The supporting text could also helpfully signpost the principles and practice set out in ‘British Standard 5837:2012 (or as subsequently updated) Trees in relation to design, demolition and construction – Recommendations’.</p> <p>DM11.II – It is unclear what “satisfactory landscaping proposals” are in respect of the policy requirement; what should the proposals specifically address (drainage? design? etc.).</p> <p>DM11.II – This criterion refers to hard surfacing in front of existing properties but it is a ‘backland development policy’.</p> <p>DM11.III - The word ‘adjoining’ seems to suggest that the policy relates to extensions, whereas the Councils understand ‘backland development’ to include standalone buildings. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings. Other development should use materials which respect the character and appearance of the immediate area.</p>
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DH12	Archaeology	<p>The NP requirement for both a desktop study and trial excavation to be undertaken is considered too onerous and not consistent with NPPF paragraph 193. However, pending findings of a desktop study, it may be appropriate for the Councils to consider whether a trial excavation is necessary. In addition, the requirements would not apply to roof extensions or any other development which involves no significant digging down. The policy should be amended to provide further clarity for when supporting evidence is needed.</p> <p>Policy DH12 requires assessments on proposals outside of Haringey’s designated Archaeological Priority Areas. The Forum is advised to contact the GLA Archaeological Advisory Service to establish whether there is a potential for extending the current designations in the Local Plan, as suggested by the Forum. Alternatively, the policy could set out that the Council will apply a watching brief in specified areas or across the Plan area.</p>
Key Sites	General comments	<p>Camden Council has no comments on the ‘Key Sites’ and Section 4.</p> <p>Haringey Council notes and welcomes the Neighbourhood Forum’s input into Haringey’s Local Plan to-date. It is acknowledged that the Key Sites included in the NP are also the subject of Site Allocations in Haringey’s emerging Local Plan. The Council is keen to ensure consistency between the Plans in order to set a cohesive and positive planning framework for managing future development, as well as delivering Borough-wide and neighbourhood level objectives.</p> <p>For the most part, sites in the NP are indicated as having been identified in the Call for Sites 2013. This is correct but it is worth noting that they were identified by the Forum and submitted in the call for sites process.</p> <p>The Council would support, through the NP, consideration of sites that are not included in the emerging Site Allocations DPD, which may have particular importance to the neighbourhood area but may not necessarily be of Borough-wide importance.</p> <p>The site description boxes should include all relevant planning designations.</p>
KS1	460-70 Archway Road	<p>This Key Site corresponds with Haringey’s emerging Policy SA38 (460-70 Archway Road). Haringey welcomes revisions to the site boundaries to bring them in line with SA38.</p>

		<p>Haringey's emerging Policy SA38 is for new residential and employment use. NP Policy KS1 sets out acceptable future uses as residential and commercial. It is unclear what is meant by commercial development– however, in light of NP Policy EA2 and corresponding Table 3 (Archway Road) there are concerns with Local Plan conformity as this may imply town centre uses. It is suggested that 'commercial' is replaced with 'employment' to bring the NP policy in line with SA38.</p> <p>KS1.I – It is unrealistic to suggest that one site can make a contribution to addressing all types of housing need. Further, the residential element should seek to contribute to meeting identified local housing need, but within the context of meeting borough-wide needs as set in the Local Plan.</p> <p>KS1.III – The NP could usefully reference emerging Policy DM6 (Building Heights), which also provides that proposals have regard to the UCS, and sets additional requirements in this regard.</p> <p>KS1.IV – Archway Road fronting the site is a Transport for London road and deliverability of additional vehicular access will need to be discussed with and agreed by TfL.</p>
KS2	Former Highgate Overground	<p>This Key Site corresponds with Haringey's emerging Policy SA40 (Former Highgate Rail Station).</p> <p>KS2.III – Regarding requirements on 'pedestrian and cycle links adjacent the site'; the policy can set out objectives in terms of its relationship with adjacent sites however it cannot set requirements on land outside of the site boundary.</p> <p>KS2.III – On existing and pedestrian cycle links, the policy would benefit from more flexible wording (e.g. any proposal must demonstrably enhance cycle routes through the site).</p>
KS3	Highgate Bowl	<p>This Key Site corresponds with Haringey's emerging SA42 (Highgate Bowl).</p> <p>KS3.I – It is unrealistic to suggest that one site can make a contribution to addressing all types of housing need. Further, the residential element should seek to contribute to meeting identified local housing need, but within the context of meeting borough-wide needs as set in the Local Plan.</p> <p>KS3.II – It is suggested that the term 'overarching masterplan' is replaced with 'site wide masterplan' to bring it in line with Haringey's emerging policy SA42 and to provide applicants with more certainty of requirements in this regard.</p> <p>KS3.II – NP requires that development is guided by pre-agreed Design Codes. This requirement is more stringent than that of the emerging Local Plan. This is no further information included in the Plan about how this will be implemented. We suggest that design issues are addressed through the site</p>

		<p>wide masterplan.</p> <p>KS3.III – ‘any development must be subservient to street scene...’; as noted in previous consultation response, the Plan may wish to use more nuanced statement here, referring Haringey’s emerging Policy DM1, DM9 and the Conservation Area Management Plan, which offer guidance on this issue.</p> <p>KS3.V – Will all development be able to create enhanced opportunities for access? Suggest slight rewording (e.g. to require all proposals to demonstrate how they have considered and, where appropriate, will deliver access improvements... etc.’</p>
KS4	40 Muswell Hill Road	<p>This Key Site corresponds with Haringey’s emerging SA43 (Summersby Road).</p> <p>KS4. – The term ‘moderate scale’ residential development is vague and is not considered to set sufficiently clear expectations for future proposals.</p> <p>KS4.II – The policy requires proposals to provide an ‘identical supply of floorspace’. This approach may not be sufficiently flexible to enable proposals for appropriate employment generating uses to come forward; suggest re-wording to set out that proposals should seek no net loss of employment floorspace. Otherwise, Haringey supports the principle of increasing employment densities.</p> <p>KS4.III – Policy sets requirements for ‘good neighbour uses’ but further details in this respect are not set out in supporting text. We suggest a more nuanced approach on this matter, with the policy focusing on protection of amenity and proposals having regard to uses adjacent the site (including residential).</p> <p>KS4.III – On amenity and heights, the policy could usefully reference Haringey’s emerging policies DM1 and DM6.</p>
KS5	Gonnerman/ Goldsmith Court	<p>This Key Site corresponds with Haringey’s emerging SA43 (Summersby Road).</p> <p>KS5 – We suggest replacing term ‘retail outlet’ with ‘appropriate town centre use’ to provide sufficient flexibility for proposals to come forward over the Plan period.</p> <p>KS5 – Is there sufficient evidence to justify the policy prescribing that the residential element must be 1 or 2 bedroom flats?</p> <p>KS5.I – Is there sufficient evidence to justify the policy prescribing that ‘at least 16 affordable units’ are required? Provision should be negotiated at the design and application stage, having regard to Haringey’s strategic housing policies. Further, Haringey Policy SP2 seeks affordable housing re-provision on a habitable room basis; the approach for</p>

		replacement by unit is not considered to be in conformity with Haringey's Local Plan.
		KS5.III – This could usefully cross-reference NP policy DH10.

### Section 3 – Strategic Environmental Assessment (SEA) comments

Camden comments	<p>The baseline the Forum has chosen to use is Camden's existing policies (a 'Do Nothing' approach). Given that most policies and issues dealt with in the report relate more to Haringey than Camden, this approach seems appropriate. When Camden and Haringey undertook the SEA screening, from the Camden side, we highlighted that significant effects were expected with regards to the following policies:</p> <p>Backland development; Basements; Embodied Energy.</p> <p>The Forum appears to have removed the Embodied Energy from the latest draft. The effects of Backland development and Basements have been considered in various areas of the report.</p> <p>Part 1 of the report focuses on alternatives to policies regarding Economic Activity and the Hillcrest Estate Open Space. As the Hillcrest Estate is in Haringey, Camden has only concerned ourselves with the Economic Activity. The summary of effects of this approach on p10 seems to be largely balanced, however the assessment does not consider the effects of permitted development rights, particularly those giving flexibility to town centre uses (e.g. A1 to A3). Also, this is likely to be an oversight but para 5.1.1 makes reference to C1 use class (hotels) being residential. Presumably this should be C3?</p> <p>Part 2 looks at the plan as a whole and assess each SEA topic (Air Quality, Biodiversity etc.) against the policies in the plan. The assessments seem balanced and we support the overall conclusions. The only additional comment I'd make is that the protection/addition of A uses is likely to offer positive effects with regards to Air Quality as people will have greater opportunities to access town centre uses by walking/cycling locally and not need to travel by car to other shopping destinations further afield.</p>
Haringey comments	<p>Paragraph 5.15 – "The policy approach to addressing other issues is relatively non-contentious at this stage in the plan process, with the emerging preferred approach having already been adjusted and refined to reflect the views of the two Councils and stakeholder organisations." Whilst it is recognised that the Forum has revised the draft Plan taking account of consultation feedback from the Councils, Haringey notes that the second pre-submission version of the Plan reflects that not all of our comments/suggestions have been taken on board; and Haringey considers there are further opportunities to amend the Plan to bring it in line with the NPPF and Haringey's adopted/emerging Local Plans.</p> <p>Paragraph 5.16 – "With regards to site specific policy, there is very little variation between what is being proposed through the emerging Neighbourhood Plan and what is being proposed through the Haringey's</p>



	<p>emerging Site Allocations Plan, hence it was deemed unnecessary to appraise alternatives for any site". Whilst Haringey generally accepts that the broad principles for future development on the NP's Key Sites align with the emerging Local Plan site allocations (notwithstanding Hillcrest) it considers there are notable variations in the detailed site requirements between the draft Plans, and we have made comments above in respect of conformity with our emerging strategic policies.</p> <p>Paragraph 6.23 – "Option 2: Rely on Camden/Haringey Local Plan policy". It would be helpful if the SA clarified in the options analysis whether the baseline alternative of Haringey Local Plan policy includes adopted Local Plan policy, emerging Local Plan policy, or both.</p> <p>Paragraph 7.21 – Please note that the Pre-submission version of the Site Allocations DPD now identifies Hillcrest as SA44.</p> <p>Paragraph 7.21 – We note that the report signposts that in response to the Forum's January 2015 consultation, the Council identified that proposals seeking to protect open land at Hillcrest Housing Estate were not in conformity with Haringey's emerging site allocation; and that the Forum has still considered it helpful to assess implications of designating the open land at Hillcrest as Local Green Space.</p> <p>Page 13 and Appendix V, (Appraisal of open space and public realm alternatives) – The appraisal scores option 1 (green space designation) comparatively better than option 2 (do not designate / Haringey draft Site Allocation), against the assessment objectives. Haringey notes that the sustainability appraisal framework against which the Neighbourhood Plan is appraised is specific to and set in the context of the neighbourhood area and the NP plan objectives. Haringey's Site Allocations Local Plan and corresponding sustainability framework are set having regard to delivering sustainable development at a broader Borough-wide basis. Haringey's emerging Site Allocations DPD has been subject to Sustainability Appraisal, with SA report for the Pre-submission version of the Plan having concluded that significant positive effects are predicted across the majority of sustainability topics, with no instances of significant negative effects predicted. Haringey also notes the findings of the appraisal which indicate that designation of the open land at Hillcrest as Local Green Space might act to preclude future residential development on parts of the site.</p>
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