

## Appendix 9: Schedule of Key Submissions to Pre-Submission HNP Consultation, December 2015 - February 2016 + Forum responses

The table below summarises the key representations received from the second Pre-Submission HNP consultation. The Forum's response is set out in the last column. To be read alongside Appendix 8.

New text – shown as [blue underline](#)

Deleted text - shown as ~~red-strikethrough~~

Name	Organisation	Summary of Response	Highgate Neighbourhood Forum Response
Roy Hill	Channing School	<p>The school supports the proposal in principle to work to try and reduce traffic problems associated with the school run.</p> <p>The plan should include more references to the safety issues associated with the school run. Can policy TR1 be strengthened by including a clause that the plan aspires to have dedicated safe crossing points for all pupils going to and from school which would be a more positive objective for schools to aspire to and work towards rather than just focusing on the negativity associated with parent parking?</p> <p>The school is concerned about the negative comments relating to the school under section TR1, and suggest the paragraph should be re-worded so it's not project specific.</p>	<p>Noted and welcome the commitment to continue to work with all parties to address the issues associated with the school run.</p> <p>This policy aims to manage and mitigate against the negative impact of construction on local amenity, it doesn't attempt to deal with safety issues associated with the school run. No further change necessary.</p> <p>Examples are necessary to say why the policy is required. In</p>

			planning terms it is all 'development'.
Tony Rybacki		<p>The HNP should not be endorsing the Council's Urban Characterisation Study.</p> <p>Disappointed at the lack of protection given in the plan for the pocket park in KS5 (Coleridge Gardens) from redevelopment - this should be reclassified and recounted as one of the much needed local green spaces of importance (as should what is variously called the Highgate Overground/Underground). There is a profound irony in the failure to protect fully these precious spaces. It will be absolutely shameful if the Local plan helps to serve up this remaining park on the Archway Road for urban re-development.</p>	<p>The Characterisation Study is a key piece of technical evidence used to support Haringey's Local Plan Documents. The HNP must demonstrate how its plan has incorporated evidence when drawing up its policies. The HNP is not advocating tall buildings across the area but purely stating that some locations could be appropriate for tall buildings if they are in keeping with the local character and are designed to meet policy requirements. No further change required.</p> <p>Policy KS5 clearly states that any loss to the pocket park is re-provided to an equal or greater area of publicly accessible open space above the railway tunnels and by the provision of a new pedestrian access to facilitate a continuation of the Parkland Walk. Many other spaces are protected in the Plan. No further change required.</p>

		How can the Gonnerman site accommodate so many flats, given the proximity of the Archway Road traffic and the number of people who cross the road at the top of Shepherds Hill there is an obvious need to retain as much open public space as possible right here.	Careful site masterplanning and design, access to public transport and local character will influence the quantum of development on site. A much larger building with no public green space was previously on this site until being bombed in the 1940s. The requirement to re-provide the existing 16 affordable units will also be a key consideration. No further change required.
Richard Webber		Please note inconsistencies around the name used for Former Highgate Overground Station.	Noted. The Forum will ensure this is corrected in the submission version.
Piotr Behnke	Natural England	Hampstead Heath Woods Site of Special Scientific Interest (SSSI) isn't mentioned anywhere in the plan. This doesn't appear to have changed since the previous consultation and as such there needs to be mention made of the site as it will form one of the main plan constraints to take into consideration.	Noted. The submission plan will mention Hampstead Heath Woods as a SSSI. Suggested change, under the heading 'Major Open Spaces' on page 46 of the draft plan to include:  "Multifunctional areas of outstanding importance in local, regional or national terms, to include but not limited to; <a href="#">Hampstead Heath, the Kenwood Estate and particularly its North Wood</a>

			<a href="#">(aka Hampstead Heath Woods) – a designated Site of Special Scientific Interest...</a> ”
Richard Parish	Historic England	Welcome the submission of the draft plan and are pleased to see comments from previous consultation have been incorporated.	Support noted. No further change required.
J. Ross Jones	Saint Gobain on behalf of Jewson Limited	KS1 – 460 Archway Road The site is very important to Jewson and we have no aspirations to vacate the site and any relocation would be opposed.	Noted. Its inclusion is because the HNF recognises the potential for this site to come forward over the medium-long term as a possible mixed use development site. The ownership of the site may change.
Katherine Ives	Lauderdale House	<p><b>Paragraph 1.3</b> – due to the planned refurbishment for Lauderdale House it should be mentioned in the plan as a local valuable resource.</p> <p>Page 23 refers to ‘The Gatehouse Theatre’. It should be Upstairs at the Gatehouse’.</p> <p>Can Lauderdale House be included in the Highgate business strip?</p> <p>Include Lauderdale House in the objective SC1 on page 80</p> <p>Should something be said about bringing together and promoting Highgate as a cultural and heritage centre? (encompassing</p>	<p>This section was not intended as a complete history of Highgate - merely the highlights as they effect development. No further change required/</p> <p>Noted. Delete <del>Gatehouse Theatre</del> and replace with <a href="#">‘Upstairs at the Gatehouse’</a></p> <p>The Highgate Village Centre contains a mix of A1 uses and the policy approach is to maintain this. No further change required.</p> <p>Beyond remit of the Plan as not planning policy.</p>

		<p>Jacksons Lane, the Cemetery, Upstairs at the Gatehouse, ourselves and others such as Highgate Contemporary art)</p> <p>Can the completion of the refurbishment of Lauderdale House be added to the CIL list? (a list of possible things the CIL could help with are identified in the representation)</p>	<p>The Forum will consider including some of these on the CIL spending list based on the plan's key aims and objectives and the priority projects the Forum think are important in the delivery of the NP.</p>
Jane Barnett	Savills on behalf of NHS Property Services Ltd (NHSPS)	<p>Supports the recognition of local residents' housing needs as a priority that should be met (sections 1.4.2 and 3.1.3) and the identification of small housing sites within fringe locations on the edge of the Highgate Bowl area (Policy KS3).</p>	<p>Support noted.</p>
		<p>The Plan doesn't meet Basic Condition A – i.e. the HNP does not have adequate regard to national policies and advice contained in guidance issued by the Secretary of State.</p> <p>The draft HNP should go further to specifically identify the northern part of the NHSPS site as a location that is suitable for housing and suitable community uses, where viable. The northern part of the NHSPS site is previously developed land and could provide new high-quality residential accommodation and improved community use facilities.</p> <p>In addition to the above, it should be noted that NHSPS does not support the inclusion of the walled garden area of the northern part of its site within a Significant Local Open Land allocation and objects to it being shown as such on Fig 18 of the draft HNP. Representations to LBH's emerging Local Plan in February 2015.</p> <p>We have already stated that design codes and/ or a wider masterplan for all the fringe sites is far too prescriptive given these small sites once specifically allocated in the draft NP will be</p>	<p>HNF has worked closely with Haringey to ensure total compliance with national policies. Also HNF has reached complete agreement with Haringey on the future for this specific site and ensure that the Neighbourhood Plan and Haringey's site allocations document are in conformity.</p> <p>Noted but not agreed. In conformity with Haringey</p> <p>The HNP is adding value to Haringey's existing policy by seeking developments to be</p>

		<p>subject to a further development control through LBH's consideration and determination of later planning applications which will consider all such issues of appropriate density, heights, massing, relationship with the surrounding built form amongst other aspects. Stalling the delivery of small and large sites through additional planning requirements which are not necessary given the process of LBH's granting planning permission is therefore contrary to the Government's objectives in this respect.</p>	<p>locally specific by setting design codes and/or a wider masterplan to ensure there is a consistent approach to the type of development that will come forward on the Bowl. Including this criteria will not stall the delivery of sites. It sets a clear message for developers as to what will be acceptable. No further change required.</p>
		<p>Basic Condition (e) – The HNP should do more to ensure general conformity with the LBH's Alterations to Strategic Policies 2011-2026, Pre-Submission dated January 2016.</p>	<p>The Basic Conditions Statement that will be submitted alongside the HNP demonstrates that the draft plan is in conformity with LBH's Strategic Policies.</p>
		<p>The HNP must reflect the latest position set out in Haringey's emerging Strategic Policies by identifying all suitable land for housing development and hence our request that the upper part of the NHSPS site is clearly identified as a site that can contribute towards the Borough's housing supply.</p> <p>Suggested change to Policy KA3:</p> <p>“This policy refers to any allocation or development in the yards on the fringes of Highgate Bowl, between the red and green lines in Fig 18, in the area adjacent to the rear of Highgate High Street. A moderate scale <b>residential or</b> residential-led development retaining, where possible, existing employment use, will be supported provided any proposal is in line with the following principles:</p>	<p>See above - no further action required.</p> <p>Many of these suggestions incorporated and text amended except where indicated:</p> <p>Agreed</p>

		<p>I. The development contributes towards <del>all types of</del> <b>meeting</b> local housing need, in line with policies elsewhere in this Plan;</p> <p>II. Any proposal seeking to deliver new development <b>within the fringe locations of the Bowl should be respectful to the adjacent open character of</b> Significant Local Open Land through <b>a careful design that respects views, as required. This is to assist the objectives of the Bowl</b> to become a focal point for Highgate life and safeguards existing employment and the skills furthered by <b>the educational/horticultural or alternative community uses</b> <del>the Harington scheme</del>;</p> <p>III. Any development <del>must be of a scale and height that takes into account the 2015 Highgate Urban Character Study subservient to the street scene of Highgate High Street, Southwood Lane and</del> <b>should respect the character and appearance of the wider conservation area</b> <del>and does not create a dominant feature which would substantially damage the</del> <b>to include</b> views from the High Street and/or Southwood Lane;</p> <p>IV. Any development must be of the highest quality, enhance the character and appearance of the Conservation Area and the Bowl and the layout of any development must additionally respect the local built form and vistas leading into and out of the Bowl;</p> <p>VI. Proposed <del>uses</del> development <del>must</del> should ideally where viable maintain and enhance <del>the</del> an educational/horticultural <b>or alternative community</b> uses of the eastern part of the Site and local SINC designation and, wherever possible, enhance the quality of the local landscape and habitats; and</p> <p>VII. Any development must take account of and mitigate against any flood risk posed by local drainage issues.</p>	<p>Future requirements for the site may be included in the site-wide masterplan.</p> <p>Agreed</p> <p>Not agreed</p> <p>Agreed</p>
		Section 4.5.1:	Agreed

		<p>The land behind Southwood Lane and Highgate High Street, including private gardens, Dukes Head Yard, Townsend Yard, and Broadbent Close <b>and the northern part of the Harington Scheme site</b>, form part of the overall Bowl site (see map above). The main body of the site should be protected as publicly accessible open space, delivering both enhanced amenity and environmental protection for the woods. However, <del>the yards</del> these <b>fringe sites (cited above) should be</b> considered as having potential for development. Should this take place any development must be low rise in order to protect the outlook from the High Street and Southwood Lane. Development should also respect existing employment use and, <b>where viable</b>, retain an <b>educational/horticultural or alternative community use</b> the <del>Harington Scheme in its current form.</del></p>	
		<p>Section 4.5.2:  Notably, the Bowl comprises an area of land with potentially significant community value. The strong wish locally is to ensure that any redevelopment develops the community use of the central area of the Bowl, with particular importance placed on <del>the retention of</del> <b>supporting</b> the Harington Scheme <b>or an alternative education/horticultural or community use where viable</b> and improved public access to the Garden Centre site. Further horticultural or arboricultural development will be encouraged in the centre of the Bowl.</p> <p>NHSPS also proposes the following alteration to Fig 18: an alteration to the green line to include the walled garden as part of the fringe area.</p>	<p>Partially amended</p> <p>Not agreed. In conformity with Haringey's site allocation</p>
Janice Burgess	Highways England	No comments.	Noted. No further change required.
Stuart Bull		A single, realistic and focussed vision for The Bowl needs to be supported by all interested parties NOW, so that funding bodies/institutions/charitable foundations can be approached with	A clear vision is set out for the Highgate Bowl under policy KS3. No further change required.



		<p>a coherent development plan. Any vision for The Bowl must be selffunding – a commercially viable operation with a business plan indicating annualised revenue to, at least, cover all management/security/running costs.</p> <p>Reflecting and safeguarding the historic use of The Bowl, future plans should be horticultural and educational in nature.</p> <p>For The Bowl to be perceived as having real unique value, it must offer much more than the substantial existing open areas already enjoyed by the local community. The Highgate Urban Eden “HOOK/BIG IDEA” will be to showcase plants from around the world.</p>	
Anne Bentham		<p>The general gist of the representations relate to SA43 from the Council’s Site Allocations document and HNP KS4 40 Muswell Hill Road. The size of the site is 0.50 ha and not 1.7ha.</p> <p>Haringey’s Site Allocations and Strategic Policies refer to estate regeneration which may have some significance for Highgate council estates in the future and whether there is anything in the Neighbourhood Plan which protects council estates from simply being a Council commodity.</p>	<p>The HNF has objected to the inclusion of Hillcrest in Haringey’s Site Allocations document. The Forum will ensure, through consultation on any planning application for estate regeneration, that they work closely with the Council on any implications of intensive housing renewal in Highgate. No further change required.</p>
	Savills on behalf of Thames Water Utilities Ltd.	<p>Infrastructure Project Table: OS31 &amp; Action CA31:</p> <p>When considering any proposals for public access, Thames Water would need to ensure that the structural integrity of the reservoirs and the operational function of the reservoirs are not compromised. As pointed out in the draft Neighbourhood Plan, whilst the reservoirs may appear as open space with grassed areas on top, large man made structures exist underneath which need to be periodically maintained to ensure their integrity.</p>	Deleted

	<p>Savills on behalf of Thames Water Utilities Ltd.</p>	<p>Key Issue – Omission of Policy Covering Water Supply and Sewerage/Wastewater Infrastructure:</p> <p>In line with the NPPF, PPG and the London Plan, local plans must include policies on the provision of infrastructure for water supply and wastewater.</p> <p>It is unclear at this stage what the net increase in demand on Thames Water’s infrastructure will be as a result of the Neighbourhood Plans proposals. It is therefore essential that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users.</p>	<p>The NPPF, PPG and London Plan state that Local Plans must include policies on the provision of infrastructure for water supply and wastewater. This issue is already addressed in Haringey’s (SP16, DM49) and Camden’s Strategic Policies (CS19) and associated Infrastructure Delivery Plans.</p> <p>This is a strategic issue and not for inclusion in the HNP. No further change required.</p>
	<p>Savills on behalf of Thames Water Utilities Ltd.</p>	<p>Thames Water consider that text along the lines of the following should be added to the Neighbourhood Plan:</p> <p>“Water Supply, Wastewater &amp; Sewerage Infrastructure</p> <p>Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.</p> <p>Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</p>	<p>This is a strategic issue and one that is already addressed in the strategic policies of Camden’s and Haringey’s Local Plans (as set out in response above). The NP does not need to duplicate existing local plan policy. No further change required.</p>

		Further information for Developers on water supply and sewerage infrastructure can be found at...	
	Savills on behalf of Thames Water Utilities Ltd.	<p>Policy DH8: Thames Water request a reference to the need for appropriate devices in any basement development:</p> <p>“Thames Water requests that all basement development incorporates a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflow causing sewer flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required in order to comply with paragraph 103 of the NPPF which highlights the need to avoid flooding and also in the interests of good building practise as recognised in Part H of the Building Regulations.”</p>	This is now policy DH7. Change incorporated..
	The Highgate Society	Any reference to the Infrastructure Project Table and CIL spending in section 1.2 should not be attached to these items as inclusion here is misleading and does appear to downgrade the purpose of the Plan.	This section explained what was being consulted upon in the Consultation Draft and asked for views on all aspects of the plan and this includes the CIL spending and infrastructure items. This paragraph has been amended in the Submission Draft to reflect the purpose of that draft.
		Section 1.3 There is no mention in this section of the area east of the village towards the Archway Road, on the other side of Archway Road and the Aylmer Road area, and little of the Bishops area. This is a serious omission. Section 1.4.1 also omits this.	This is not a comprehensive history of Highgate, merely highlights to illustrate development issues. No change necessary.
		Section 1.4.2 - Without evidence to show that Highgate is well-served by state schools, the statement should be amended to	This information comes from both Councils' Infrastructure Delivery Plans to ascertain the

		make the situation clearer; or evidence should be made available at examination.	actual quantum of existing education provision within the neighbourhood area. 87% of Haringey families and 80% of Camden families were offered their first preference school in 2016 - there is no evidence that Highgate was an exception to this.
		<p>Section 1.4.5 A photograph showing congestion on Archway Road rather than a photo Highgate Hill from without the Forum area would illustrate the last point more even handily, as this is the area of heaviest traffic within the Forum. In addition, high levels of illegal parking are an enforcement rather than a planning policy issue and should not be in this document.</p> <p>Section 1.4.6 The final sentence is a key point and warrants bold text as used on the previous page.</p> <p>Section 1.4.9. Could Islington and Barnet be briefly mentioned here? It would clarify the fuzzy edges</p>	<p>The 2016 Air Quality Survey undertaken by the HNF show highest levels of pollutants on Highgate Hill. No change.</p> <p>It's acceptable to make reference to illegal parking even if it's not a pure planning policy issue. No change.</p> <p>Disagree. There is no need to bold this sentence.</p> <p>The reason for only referring to Camden and Haringey is because the neighbourhood area straddles these two boroughs. No further change required.</p>
		<p>Section 2.1 First paragraphs need rephrasing to indicate that it is more than one village. It is effectively three.</p>	The vision has been developed over the course of the extensive community engagement carried

		<p>Section SO2.1 –The words “the business premises in the” before Archway Road should be omitted as this seems to imply that the vision only extends to the business premises and not the Archway Road as a whole.</p>	<p>out for the HNP and further amended in the Submission Draft. “Village” has been changed to “neighbourhood”.</p> <p>Archway Road is very long and parts of it are residential. The vision extends to the four business areas as identified in the Plan Policy EA2.</p>
		<p>Whilst it is recognised that there is a need to have more mixed income housing, and more accommodation for the elderly, there is no indication of where they should go, particularly as this is a direct contradiction of other sections of the Plan which argue against infill and back garden development and disrupting the roofline. Currently the need for housing is taking precedence over all other forms of development and it is likely that allotment provision will not be a priority.</p> <p>The Plan should provide after school programmes for children, consider having a branch of the University of the Third Age, or similar organization offering high-level life-long learning opportunities for the elderly.</p>	<p>The HNP must demonstrate that it is pro-development, and the Forum considers it does. The Key Site Allocations provide the policy direction for the appropriate location for more housing. A link to KS policies will be made in section SC.</p> <p>After the last paragraph of supporting text under policy SC1, include the following:  <a href="#">Section 4 of the Plan sets out in more detail the criteria which should guide the future mix of uses and forms of development for each site.</a></p> <p>There needs to be evidence in place to support the objective of providing such uses. The Forum will monitor this issue and</p>

			include a provision in the CIL spending list or as a policy when the NP is reviewed, as appropriate.
		It is noted that the SEA (5.1.6) states that the Richardsons' planning application (HGY/2015/2517) has been approved. This was not the case at the time of publication of the Plan and will not be the case when the consultation period ends as it is due to go to Haringey's Planning Sub-Committee on 8 February 2016.	Out of date. Application approved
		The Society would like to see the inclusion of the following statement below 'Any application proposing the loss or change of use of A or B class premises should assess its potential impact on the shopping area and employment opportunities as a whole.'	This issue is adequately addressed in Haringey's emerging DM policies. No further change required.
		Policy EA1 - The Society supports the relocation of 271 bus stand but feels that the specifics about the design of what replaces it should be subject to a separate consultation.	Noted. Consultation on the design of the 271 bus stand is not an issue for the NP. No further change required.
		3.3.1 – the Society feels a sentence about liaising closely with neighbouring boroughs not within the Forum Area would be beneficial here.	The Forum don't consider this inclusion is necessary. No further change required.
		TR1 – Movement of Heavy Goods: It is not feasible to require a CMP at pre-approval stage and it can only be conditioned. It is also important to set down when a CMP would be required. It unclear whether the sites are to be located near TfL roads which would have a severe impact on development. This needs rephrasing. III. This policy also insists on specific contributions toward the repair of roads and other infrastructure as a result of development. It seeks to do so via s106 agreements for larger developments, including big residential ones with basements, but	This issue is very important to the Forum who consider this policy approach will help address the negative issues associated with construction on local amenity. No further change required.

		<p>there are concerns that s106s have proved problematic to enforce and are also confidential</p> <p>Clause 4 should ideally be strengthened to a specific requirement, with perhaps a set allocation for off-site use and penalties for violations of that allocation, e.g. construction workers using additional parking places.</p> <p>There are also non transport issues relating to CMP's and these need to be accommodated somewhere in the Plan if not in this section.</p>	
		<p>TR2 seeks to insist that drop-off and pick-up points are provided on site and not at the expense of street parking. This is welcomed but it is somewhat contradictory of TR3 (see below), which wants all new developments to be as car-free as possible. It also directly contravenes recent plans for the junction of Cholmeley Park, which will be creating designated spaces for Channing drop-off on the street.</p>	<p>Drop-off and pick-up points are different to seeking car-free developments as far as possible. The Forum does not see a contradiction. No further change required.</p>
		<p>TR3 specifies that off-street parking will be required to preserve "means of enclosure" such as trees or gardens, but exempts private residential developments which already have off-street parking from this. The Society opposes any exemption as it appears it would allow for all the mega-mansions to remove their landscaping in order to provide more forecourt parking or access to underground car parks. This arguably is extremely damaging to the Conservation Area and constitutes a breach of NPPF 135/6. The Plan recognises that commuter traffic is a big problem and cites poor east-west bus services as a large contributor to the problem. However, what it does not address is the predicted 60% increase in traffic caused by increased population, minicab use and white van deliveries.</p>	<p>The Forum does not see a policy conflict associated with this approach. No further change required.</p>
		<p>TR4 - good pedestrian signage but design of that signage will have to be monitored to ensure that it does not result in excessive street clutter and is sensitive to the Conservation Area status of</p>	<p>Design of signage will be subject to the Council's planning policies on signs in conservation areas. No change required.</p>

		the Neighbourhood. The Plan should ensure that new pedestrian crossings do not result in the loss of on-street parking spaces.	
		TR5 - The issue here is not just the provision of dropped kerbs and cross overs but the loss these cause to the provision of on street parking. The Society feels this policy is so caveated that it is fundamentally weakened. TR5 comments that dropped kerbs/off street parking should not damage the CA by the removal of "character enhancers" but again, there is contradiction here with TR3 which permits private residences with off-street parking to be exempt from subsequent parking restrictions. Therefore, there is a situation potentially permissible in the Neighbourhood where access points to provide carriage drives could be in accordance with this policy. Finally, there is the slight contradiction in seeking to resist applications which include off- street parking, yet not wanting to allow developments to contribute to parking stress.	This was superseded by new Haringey policy which is stronger. And now reads in TR5: "Planning applications for the provision of off-street parking accessible by dropped kerbs will not be supported in areas covered by a CPZ."  No further change required.
		Section 3.3.4 Related non statutory Traffic and Transport Actions: CA17 Safe and well signaled cycle routes can be unpopular if they involve road closures which disadvantage residents and result in traffic congestion on surrounding streets (eg recent Mini Holland scheme in Walthamstow now being dismantled after residents outcry) so this needs to be conditioned. CA19 The Neighbourhood currently has a 10am-12pm restricted parking time which has been imposed to prevent commuter parking. This time zone is very popular and any change to this could be contentious. CA23 It should be noted that shared access routes are not universally welcomed and there are major safety concerns, particularly between cycles and pedestrians.	The Forum consider these transport actions are feasible and will work with all relevant parties to ensure they are achieved. No further change required.
		OS1 Fringes of Highgate's open spaces III This item refers to protected views but this does not seem to be included	Criteria III refers to both Camden and Haringey's strategic views. Amend to read:



		OS3 Local Green Spaces - a key to Fig 10 would be useful here	<p>“It does not harm protected views identified on the Boroughs’ policies map”</p> <p>They are listed at the beginning of the policy. Add see fig10 to start of policy.</p>
		Design & Heritage Policies – welcome the strong approach to design and heritage in the HNP.	Support noted.
		DH1 - This policy states that demolitions in CAs will only be supported in exceptional circumstances. This should be extended/strengthened to say demolitions in CAs will be opposed. Otherwise, the Plan just says what HGY supposedly does already.	The policy needs to have an element of some flexibility. Including “exceptional circumstances” doesn’t make the policy weak. No further change required.
		DH2 Development Proposals in Highgate’s Conservation Areas This affirms the Plan’s support for the CAA and MP and basically repeats what it says about exterior materials, windows and satellite dishes. Could this include for façade retention where the essential character is lost by the demolition of the bulk of the building.	DH2 has been redrafted to respond to a number of representations submitted.
		DH3 – DH7 Rear extensions, side extensions, gaps between buildings, roofs and roofscapes, front boundary treatment, shop fronts are all issues which should be strengthened. Rooflights must be on rear or hidden slopes and of heritage style, rear extensions must be subordinate, gaps between houses must be preserved. It is felt that this policy is not robust enough.	Amendments have been made to these policies. Forum shopfront policy DH7 adds nothing to Borough policies and has been withdrawn.
		Support for policy DH6.	Noted.
		Policy DH8 - the introduction of a unified policy for Haringey and Camden is welcomed. The Society would welcome the inclusion of something dealing specifically with the terraced house situation,	Support noted. This is now DH7 Changes have been made to policy DH7 to reflect a number of

		where the potential for damage to neighbouring properties is considerably increased. Applications for basements on steep slopes are now being made. Richmond has excellent guidance on this and possibly something similar could be introduced.	representations submitted to the consultation.
		DH8.1 Enhanced BIA requirements The wording on this policy is unclear as to whether this means at Pre Application Submission stage or at planning stage.	Now DH7 has been redrafted following representations and conversations with both Camden and Haringey. No further change required.
		DH8.2. Protection for neighbours i. Can this item be checked as it appears that this is already covered by Party Wall ii. Agreed but independence should be ensured iii. See previous comments about CMP which would be more appropriate here iv. BCP (Basement Construction Plan) v. Who will monitor these – the appointment of suitable qualified persons need to be DH8.3 ii Is the requirement for a CMP charge going to be acceptable and if so how has legislation ensured the figure for the levy been set?	As above.
		DH9 is on refuse storage. The requirement for off-street storage facilities and that these are properly screened is welcomed, but care must be taken that this provision doesn't mean the loss of front gardens or boundary walls, etc. In addition, in cases of small front gardens where refuse cannot be accommodated, conversions which will result in greater demand for refuse storage should be resisted.	In light of representations from both Camden and Haringey, this policy has been redrafted. Furthermore, this policy has been amended and a new clause has been added to read:  “ <a href="#">Developers are advised to refer to emerging Haringey policy DM4 and standards set out in Appendix 3 of the Sustainable</a> ”

			<a href="#">Design and Construction SPD for guidance.”</a>
		DH11 addresses backlands development and could come out more firmly against back garden developments.	This policy has been redrafted following representations and discussions with both Camden and Haringey Councils.
		DH12 It does only initially require a desktop survey, when maybe an excavation should be required in the sensitive areas straight away.	This policy has been redrafted following representations and discussions with both Camden and Haringey Councils.
		Key site 5 Gonnermann Site and Goldsmith’s Court – It is assumed that the boundary has been produced from out of date drawings as this strip of land is a relatively recent addition to the allotment site.	Noted. Correct boundary will be shown on map.
		The Delivery and Monitoring section is welcomed. The secretaries of each allotment association are currently responsible for the list and the Society would like to see the current situation retained.	Noted.
		Policies TR1-4 The Society feels it should be included as monitors in these sections and is surprised at the omission. In addition some of the TR4 policies will have implications on local residents and they should be included in any delivery/monitoring.	HS added
	CBRE on behalf of Highgate School	Object to the Highgate School being classed as a ‘community facility’, it is a charity.	In terms of planning for community infrastructure, schools are classed as community facilities. Title of map (Fig 3) in which school is listed has been changed to <a href="#">Highgate’s Social, Community and Cultural Resources</a>

	CBRE on behalf of Highgate School	KS5 Could the Friends of Highgate Library be included as key delivery partners	Noted. Amend policy KS5 to reflect this.
	Highgate Society	<p>The list for CIL Spending includes an outdoors community hub/café and food trail/garden shop in the Highgate Bowl. It is felt that this is premature to include this at this stage.</p> <p>The last item is the development of the corner of Church Road for community use. This is NHS land and is allocated for future expansion of medical facilities. The Society feels this should take priority over any future community use to facilitate primary care and would like to see the reference to Church Road removed.</p>	<p>The list sets the intention/aspiration for the type of community facility that could be provided on the Bowl and its not considered premature. No change required.</p> <p>This item has been deleted from the CIL list.</p>
	CBRE on behalf of Highgate School	Figure 3, page 22 – the map shows Highgate School and its ground as a community facility. The map should be amended to remove the two green marks covering Highgate School’s two campuses (Village and Bishopswood Road) and the blue circle which covers the School’s Sports Centre,	See above
	CBRE on behalf of Highgate School	<p>Core Objective 4 (page 16) and Core Objective 4 (page 45) Although the school’s playing fields are listed as open space, they are not in fact publicly accessible, and the benefit they give the community is in essence the open vistas they provide especially along Hampstead Lane. Core Objective 4 on page 16 should be amended: “...open space, whether publicly accessible or not”. This should also be inserted in Core Objective 4 on page 45.</p> <p>Also on page 45, insert “...to ensure that it is used, or, where privately owned and not publicly accessible, appropriately sustained, for the benefit of...”</p>	<p>Reference to public access removed</p> <p>Amend Core Objective 4 on page 45 to read: <a href="#">“...to ensure that it is used, or, where privately owned and not publicly accessible.”</a></p>

			<a href="#">appropriately sustained, for the benefit of...</a>
	CBRE on behalf of Highgate School	Policy OS3 – the proposal to designate Highgate Chapel Churchyard (Coleridge Garden) as a Local Green Space. The land is not a churchyard, but a consecrated burying ground, and it has never been known to the School as beneficial owner as ‘The Coleridge Garden’. The School does not agree that it is designated as a Local Green Space.	Agreed and removed
	CBRE on behalf of Highgate School	<p>Policy KS3: Highgate Bowl</p> <p>Welcome the amended map showing the correct boundary so that only the Parade Ground is now placed in the Bowl area. However, the map would benefit from a key that explained the relationship between the red and green lines.</p> <p>Secondly, the position should be that the red and green lines converge alongside the boundary of the Dyne House site, which boundary follows an historic, slight zigzag of the boundary wall as now exists. The two lines on the map on page 70 should be redrawn to be in full convergence with each other at this part of the Bowl boundary.</p>	Noted. The plan on page 70 will be amended in light of these helpful comments.
	CBRE on behalf of Highgate School	In the third paragraph on page 72, the phrase ‘and the rear of the Dyne House site’ is deleted. In the same paragraph, delete ‘former’ from the ‘Former Parade Ground’	Noted and amended
	CBRE on behalf of Highgate School	Para 4.5.1 on page 71 and 72 needs to be made clear in that Highgate School’s Parade Ground, although within the Bowl, is private land and is excluded from the ‘main body’ of the Bowl, which is to ‘be protected as publicly accessible open space’, and that there is no public access to it from Kingsley Place.	Amendment above is sufficient.
	CBRE on behalf of Highgate School	Policy SC1 – the policy needs to be made more flexible, reflecting our comments to the previous consultation. Therefore, in policy SC1, insert ‘where possible’, in the second line so that it reads: “...demonstrate how, where possible, they are...”	The Forum considers this will weaken the policy by not seeking applications to always demonstrate that they are looking to deliver an appropriate

			<p>mix of housing. The term 'where possible' could be included in the supporting text.</p>
	<p>CBRE on behalf of Highgate School</p>	<p>Policy TR1 – the second sentence referring to s106 should be deleted.</p> <p>The concept of 'significant development should be defined for the purpose of the policy.</p> <p>The problem of traffic management associated with construction development should be addressed via a Construction Management Plan.</p>	<p>The Forum consider the use of s106 will help contribute towards repairing any damage caused to the public realm as a result of such movements. No further change required.</p> <p>Agree, a definition of what significant development is will be inserted in the submission HNP.</p> <p>Noted.</p>
		<p>TR2 – as this policy references Camden Planning Guidance, the NP as a whole needs to make reference to all relevant policies that will apply to the area, or not, and how possible conflicts are to be managed.</p>	<p>The HNP does make reference to relevant Camden and Haringey policy, particularly when the HNP policy seeks to reinforce or add value to existing policy. No further change required.</p>
		<p>TR3 – to ensure flexibility, amend the wording of the policy as follows:          "Any new off-street parking will additionally be required to preserve or re-provide any means of enclosure, trees, or the features of a forecourt or garden that make a significant contribution to the visual appearance of the area".</p>	<p>TR3 amended</p>
		<p>OS1 – welcome the amendments following previous consultation, but there is still a need for flexibility. Criteria v to be amended as follows:</p>	<p>Extensively re-edited following representations, now policy OS2</p>

		<p>“Trees, whether or not protected by tree preservation orders, will not be removed or harmed unless demonstrably necessary, <b>or</b>, otherwise in the public interest, <b>re-provided or relocate</b>.</p> <p>(the School believe this is the approach taken by Haringey in determining recent applications).</p>	
		<p>Policy OS2 – support the intention of this policy, but like OS1, needs to be made more flexible. Suggest including ‘<b>or</b>’ before the last clause, to read as follows:  “...<b>or</b> a clear public benefit outweighing the loss of the tree can be demonstrated”</p>	As above
		<p>Policy OS4 – the general intent of this policy is supported, but the requisite timescale for a survey should not exceed that which would otherwise normally be required for a planning application.</p>	As above
		<p>CA31 – the Forum to be clear on what particular piece of land they have in mind to provide community access to some privately held tracts of land. A degree of certainty needs to be provided.</p>	Withdrawn
		<p>DH2 – a degree of flexibility is required regarding the materials, retaining original doors, windows etc. Suggest the policy reads as follows:  “Original building materials, finishes and decorative details are vital to Highgate’s special character and should be retained, <b>where practicable</b>. Proposals for painting or rendering of exposed brickwork, or the removal of original architectural features, <b>will be supported only with robust justification</b>.</p>	Policy redrafted following multiple representations
		<p>Policy DH4 – sufficient flexibility is required here, so to acknowledge that each development will be different and must be treated on its merits. Suggest the following is added to the last part of the policy:  “...<b>unless considered appropriate by the Planning Authority in a specific context</b>”.</p>	As above

		<p>DH8 – policy is still too prescriptive. The policy should only apply to new developments, properties which were originally constructed for residential use or developments adjacent to residential properties. Basement development for commercial properties should not be restricted, subject to normal planning processes.</p> <p>If a development is not liable for CIL then additional charges should not apply, as is stated in criteria 3 of DH8.</p>	<p>Now DH7, this policy has been redrafted following representations and discussions with both Camden and Haringey Councils.</p>