

Highgate Neighbourhood Plan – Statement of Common Ground

Section	Camden response	Haringey response	Forum response	Statement of Common Ground
General		<p>Consistent with NPPF paragraph 16, the Neighbourhood Plan should support the strategic development needs set out in Haringey's Local Plan and also plan positively to support local development that is outside of the strategic elements of the Local Plan. The purpose of the Neighbourhood Plan is therefore not to control or constrain development planned for by the Local Plan – Haringey Council considers the Neighbourhood Plan, as currently set out, is harmful to the delivery of the Local Plan.</p>	<p>We were shocked and disappointed to receive these comments. With the exception of our/Haringey policies on the Hillcrest Estate (on which we agreed to differ and for an Examiner to rule), all of our policies and their wording have been painstakingly agreed with Haringey officials over the course of a number of (cordial) meetings and written comments and they have often gone out of their way to help us with detailed wording. So it is surprising to find they now object to this wording and even the policies themselves.</p> <p>We have also</p>	<p>Through the public examination, including the Statement of Common Ground process, the Councils and Forum are seeking to ensure that the Neighbourhood Plan complements and supports delivery of Haringey and Camden's Local Plans and the strategic growth requirements of Highgate and the Boroughs.</p> <p>At a meeting on 5th January 2017 to agree this Statement of Common Ground, the Forum and Council discussed the Councils' representation to the Examiner.</p> <p>This meeting has resulted in suggested wording and actions to resolve a number of outstanding issues. The Forum and Councils have set out potential solutions or changes to the wording in this table, showing where we have reached agreement.</p> <p>A few outstanding matters could not be fully agreed between the Councils and the Neighbourhood Forum. These are: the use of the term "significant development" in TR2 (deciding when construction management plans and delivery and servicing plans are required); the circumstances in which a cross-over is resisted in TR5; and the way DH8 relating to waste management purposes is applied.</p> <p>There were also some matters which could not be fully agreed between Haringey Council and the Neighbourhood Forum. These are: TR4 Car Free Development (circumstances where acceptable); TR5 Dropped Kerbs and Crossovers (definition of Areas of High Parking Stress) and TR4.V (parking capacity); OS3</p>

			<p>undergone a “Plan Healthcheck” (undertaken by John Slater of NPIERS and funded by Locality) and made all the changes suggested by that Examiner in order to obtain a clean bill of health.</p>	<p>Local Green Space (designation of Hillcrest Open Land); and Key Site Policies (General: Status of Key Sites); KS3 Highgate Bowl (Site requirements); KS5 Gonnerman and Goldsmith Court (some detailed site requirements).</p> <p>The two Councils do not consider there are areas of disagreement between them and support the recommended changes set out below.</p>
		<p>Further to the above, the Neighbourhood Plan should plan positively to encourage local development coming forward and not unnecessarily restrict certain forms of development where impacts can be appropriately mitigated. The phrasing used in some policies is not considered to reflect this approach (i.e. “proposals will not be permitted”, “under no circumstances”, “not normally permitted”,</p>	<p>See above.</p>	

		<p>etc). Whilst the underlying policy principles may be acceptable in many of these cases, re-phrasing would assist in setting a more positive framework for managing development.</p>		
		<p>Some policies are considered to set overly onerous requirements, particularly where they specify information that should be submitted along with planning applications. The Council has signposted these in the detailed comments below. NPPF paragraph 193 provides that local planning authorities should only request supporting information that is relevant, necessary and material to the application in</p>	<p>See above.</p>	

		<p>question. In addition, some policies are considered overly prescriptive (e.g. Design and Heritage section) and offer very limited flexibility for consideration of proposals having regard to individual site circumstances.</p>		
		<p>The Forum has stated in several instances that the Neighbourhood Plan seeks to provide more cohesion between Haringey and Camden planning policies. Officers at both Councils acknowledge the cross-borough nature of the plan. They have therefore worked together on advising the Forum throughout the plan preparation process, including on matters where they consider there is scope for reconciling</p>	<p>See our general response at the top of this document. We are not clear how our neighbourhood plan can reconcile the differences between the two Councils.</p>	

		<p>approaches across the Neighbourhood Area. However there are policy areas where Haringey Council does not support such reconciliation (including transport policies) owing to unique circumstances which have required different strategic approaches between boroughs. These have been signposted in the detailed comments below.</p>		
		<p>In a number of instances throughout the Plan the term “significant development” is used. This term should be replaced with “major development” to bring it in line with higher level policies in the Development Plan and to help avoid confusion for users.</p>	<p>Agreed</p>	<p>This is addressed under the relevant transport policies below (TR1 to TR3)</p>

		<p>Information that is available on the Neighbourhood Forum website or elsewhere should be included in the Neighbourhood Plan where this is material to the policies and their implementation (i.e. the four Plan Annexes on the Forum website).</p>	<p>We were advised that it would be acceptable for Appendices to be housed on our website on the Plan page. Equally, all other evidence is provided via links to the website in Appendix 1 and we were advised that this would be appropriate. We have organised matters in this way for sake of easy reading of the Plan and also for practical reasons as we have no budget to print the very large document that would arise if it was organised in a different fashion. We note that Camden – which has much more experience of neighbourhood plans - is not asking for this.</p>	<p>The Appendices are intended to form part of the Neighbourhood Plan with the Evidence Base made available separately and accessible online.</p> <p>It was agreed that Appendices 1, 4 and 5 could be included in their current format. There are some suggested amendments relating to Appendices 2 and 3, which are explained further in the table below.</p>
		<p>For the most part</p>	<p>See below</p>	

		<p>the structure and layout of the document is clear and sets out the vision and objectives well. However, the Plan would greatly benefit from the addition of a consistent policy numbering format along with paragraph numbering throughout the supporting text. This will assist both the public and planning officers with its future use (e.g. for referencing in applications and reports). Additionally, for consistency and in line with the layout of the Council's Local Plan, we suggest ensuring that all policies are followed by supporting text setting out the reasons why the</p>	<p>regarding paragraph numbering. As requested, we have placed supporting text after each policy. At no point in all the above lengthy discussions have Haringey asked for more evidence than is currently laid out.</p>	
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		policy is necessary and the evidence to support this assertion.		
General	It would be useful if the Plan included paragraph numbering to assist developers, members of the public and planning officers when referencing the Plan in applications and reports. It is recommended that paragraph numbering is added throughout the document.		We were advised by AECOM that our numbering system would be sufficient (and we believe clearer, given the complicated policy numbering system) – it is also the method used by several neighbourhood plans which have successfully passed Examination and Referendum.	Following the Examination, the Councils will format the Plan to ensure a consistent numbering system for the policies and the supporting text. This will make it easier for residents, applicants, planning officers, Planning Committee and Inspectors to use the Plan, as they will be able to reference specific policy criteria and paragraph numbers.
Sub-objective SO5.1, page 17 and Core Objective 5, page 54	This states that the design and form of new development should preserve and enhance Highgate's Conservation Areas. This goes beyond both the 1990 Listed Buildings and Conservation Areas Act and Camden Council's emerging Local Plan submission		We would be happy to receive further advice on how this should be reworded	It is suggested references in the text are amended to: " <u>conserve or enhance</u> ", as this reflects the Listed Buildings and Conservation Areas Act.

	draft which requires “preserves, or where possible, enhances”. It is recommended that this sub-objective is reworded to avoid conflict with the 1990 Act.			
Policy SC1 1 st paragraph		SC1 (1 st paragraph) – The policy sets out that it seeks to meet identified housing need and then follows with criteria dealing exclusively with housing type, size and tenure. The Council notes that housing need is as much about quantum as it is typology. In this context Haringey’s Local Plan seeks to deliver a minimum of 300 net additional housing units in Highgate to 2026, which the Neighbourhood Plan should support consistent with the NPPF.	We were advised by both Councils and our consultants that the NP could go into more detail than Local Plans, provided that it is conformity with them – this is what we have endeavoured to do.	Haringey has a strategic housing requirement in terms of quantum for Highgate (there is not a target for the Camden part of the neighbourhood area). This should be cross-referenced in the supporting text to the policy as an important consideration for all proposed housing schemes. It is therefore suggested that the supporting text is amended to include the following: <u>“Haringey’s Local Plan seeks to deliver a minimum of 300 net additional housing units in Highgate to 2026, which the Neighbourhood Plan supports and will help to facilitate”</u> .

<p>Policy SC1, Criterion I, Page 21</p>	<p>While the Council's preference is for affordable housing to be delivered 'on-site', it does not apply a specific target for developments. It is recommended that reference to council "targets" for on-site provision is removed for accuracy.</p>	<p>SC1.1 – The reference to "on-site" targets should be removed to ensure conformity with the London Plan and Haringey's Local Plan which set borough-wide targets for affordable housing provision.</p>	<p>Our intention here is to secure the appropriate proportion of affordable housing in new developments in our area – otherwise deals tend to be done between developers and the Councils where such housing is supplied in another part of the Borough. We would welcome advice on how to resolve this.</p>	<p>Within the context of supporting delivery of the Councils' strategic housing requirements, the Plan should include a policy which seeks to address housing size, type and tenure.</p> <p>Criterion SC1.I : it is suggested this is reworded as follows: "<u>Affordable housing that meets the Boroughs' targets and is delivered on-site</u>" – this would remove the perception there is a numerical target for on-site provision.</p> <p>The Councils have clarified their expectation for affordable housing to be provided on-site but in exceptional circumstances off-site provision or a contribution in lieu may be acceptable (e.g. such as where registered providers do not wish to manage one or a few units on a single site) and the existing borough policies provide for this.</p> <p>To address the Forum's specific concern about local provision, we suggest the supporting text is amended with additional wording between the 1st and 2nd paragraphs, as follows:</p> <p><u>"On-site provision of affordable housing will be sought given the under-provision locally, and where off-site provision is to be provided, proposals should seek to deliver this in Highgate where possible"</u>.</p>
<p>SC1, criterion II, page 21</p>	<p>"Efficient use of land and buildings..." It is unclear how this should be applied. It is recommended that the supporting text provides further</p>	<p>SC1.II – The phrase "efficient use of land" should be clarified as it is not clear how this would be applied. To ensure consistency</p>	<p>Can change wording as per Haringey suggestion.</p>	<p>To bring the policy in line with higher level policy, it is suggested SC1.II is amended as follows:</p> <p>"Efficient <u>Optimise the use of land and buildings on individual sites..."</u></p>

	explanation of the term “efficient”.	with higher level policies, it is recommended that the policy refers to “optimising” the use of land in this context.		
SC1, criterion III, page 21	<p>“starter homes” – this is increasingly understood as a particular type of affordable housing product. It would be helpful if different terminology was used to distinguish the Plan’s aims for starter homes from housing being promoted through the Housing and Planning Act.</p> <p>It is recommended that the meaning of “starter homes” in this policy is clarified.</p>	<p>SC1.III – It is recommended that the criteria within this policy are separated as one is dealing with unit size and the other with tenure type (“starter homes” are considered an affordable housing product and this would seemingly fit better within criterion with SC1.1).</p>	<p>We were advised that we had to use this terminology to comply with national policy – happy to change if we can achieve our aim of encouraging developments which include homes for first time buyers. However, we note that Haringey seem to continue to use “starter homes” below.</p>	<p>It is noted that ‘starter homes’ are not currently required by the London Plan. It is suggested that the 4th paragraph of the supporting text to policy SC1 is amended for accuracy.</p> <p>It is also suggested that policy SC1.III is amended as follows:</p> <p><u>“Inclusion of smaller units to provide for a mix of housing sizes and to allow older residents to downsize from family housing to smaller units and supported housing, as well as to provide ‘starter homes’ for younger people affordable housing products aimed at first time buyers;”</u></p>
SC1, criterion IV, page 21	<p>Self-build and custom-build housing – the Plan needs to make clear that any provision for this type of housing is subject to demonstration of need through the Council’s</p>	<p>SC1.IV – In prioritising self-build and custom-build housing, the Plan should demonstrate evidence of local need and identify sites where such</p>	<p>Agreed.</p>	<p>It is suggested the last sentence of Policy SCI.(IV) is amended as follows:</p> <p>“These may include licensed HMOs, studio apartments, and opportunities for a different range of housing types, such as self-build or custom build <u>where there is a demonstrable need</u>”</p>

	<p>self-build housing registers. As worded, the policy may be interpreted as elevating the provision of self-build housing over all other types of housing.</p> <p>It is recommended that the link between self-build housing and evidence of need, i.e. the council’s self-build registers is acknowledged within the supporting text to the policy.</p>	<p>need can be met – this is in order to satisfy the NPPF requirement for meeting objectively assessed need. As currently worded the policy may be interpreted as elevating the provision of self-build over all other types of housing, yet it is not clear where this need has been identified for Highgate. 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 further explanation as to what is meant by “innovative and creative” in SC1.IV, as it is not clear how this requirement would be</p>		<p>It is suggested that additional supporting text at end of the 4th paragraph should be included to make clear the link between the policy and the Councils’ self-build registers, as follows:</p> <p><u>“For the respective Local Plans, the Councils have made arrangements for the gathering of evidence of need for self-build housing.”</u></p>
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		implemented in this context.		
Page 22	Supporting text to Policy SC1 – refers to the delivery of the level of ‘starter homes’ required by the London Plan. There is no target in the current London Plan for starter homes. It is recommended that the reference to a ‘starter homes’ target in the London Plan is deleted for accuracy.		Again, we would welcome advice on how this should be worded	It is noted that there are no targets in the current London Plan for Starter Homes so it is suggested that this part of the sentence is deleted for accuracy, as per comment in relation to Policy SC1 above.
Page 22		Supporting text (4 th paragraph) regarding loss of housing – This appears to read as a policy requirement and should therefore be set in the policy box. As currently worded, this requirement is not fully in conformity with London Plan Policy 3.14 which states that loss of housing should be resisted	This was included in a policy in earlier drafts of the Plan but we were advised by the Councils that this was not appropriate.	It is also suggested that additional text is added to the last sentence of 4 th paragraph to confirm that the approach is consistent with the London Plan, as follows: “Specialist forms of housing are encouraged to meet identified local need and in line with higher level policies the loss of housing will be resisted unless replaced <u>at existing or higher densities</u> with at least the equivalent floorspace and meets local housing need.”

		unless replaced at existing or higher densities with at least equivalent floorspace.		
Page 23	<p>“It is vital that all new development in the Plan area helps maintain”... while it is appreciated this is supporting text, it may raise expectations that cannot be achieved. Many minor forms of development are not eligible to pay the Community Infrastructure Levy and there are exemptions for some types of housing, e.g. self-build developments which are specifically encouraged by Policy SC1.</p> <p>It is recommended that the words “all new” are deleted to more closely reflect the nature of schemes likely to contribute towards community facilities.</p>	<p>Page 23 (3rd paragraph) “It is vital that all new development in the Plan area helps maintain...” – This paragraph appears to set requirements on new development which should be appropriately included in a policy rather than supporting text. Notwithstanding this technical matter, the requirement which is placed on “all new development” does reflect that many minor forms of development are not eligible for Community Infrastructure Levy and some types of development are CIL exempt.</p>	Agreed to delete “all new”	<p>It is suggested that on Page 23, the 1st sentence of 3rd paragraph is amended, as follows:</p> <p><u>“In line with paragraph 69 of the NPPF, it is vital that all new development in the Plan area...”</u></p>

<p>Page 23 re Community facilities/CIL</p>		<p>Page 23 (3rd paragraph) “Ensure an adequate supply of community facilities is provided to accommodate a growing population” – It is not clear whether an assessment has been undertaken to identify which types of facilities are needed.</p> <p>Page 23 (3rd paragraph) “Specific projects that have emerged...” - Where the Forum intends to use CIL funding towards projects identified on its CIL priority list, this should be clearly set out in policy. However the CIL list can continue to sit separately from the policy, as it will likely be subject to periodic review and updating over the life of the Plan.</p>	<p>It has since been suggested to us by Haringey that detailed CIL spending priorities should be included in the Plan – it would be helpful to have guidance on wording this. We note that they here say that the CIL list can sit separately from the policy, so it would be useful to have detailed guidance on this.</p>	<p>It was agreed between the Councils and the Forum that the Plan should be amended to include a policy in this section (i.e. at the Community Facilities subheading) setting out the Forum’s recommended priorities for funding from the local element of CIL, as follows:</p> <p>“Policy SCX: Community Facilities</p> <p>The Highgate Neighbourhood Forum’s recommended priorities for funding from the local element of the Community Infrastructure Levy (CIL) are listed as follows (in order of popularity in poll during Consultation):</p> <ul style="list-style-type: none"> • Feasibility study for shuttle buses linking local communities • Enhancing Pond Square • Supporting Waterlow Park • Highgate Bowl Project • Community space at 271 terminus • Trees on North Hill/Archway Road • Facility for young people • Dedicated safe cycleways • Creating green pockets and corridors • Crossings on Archway Rd/Wellington etc • Playgrounds at Hillcrest and the Parkland Walk • Safe cycling learning space • Solar panel and wind turbine schemes • Enabling guerilla gardening • Green walkways • Support for Holly Lodge Community Centre
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<p>Policy SC2 Criterion I</p>	<p>Camden’s policies seek to protect all designated open spaces in the Borough. Fitzroy Park Allotments is also Metropolitan Open Land. The words “wherever possible” implies there may be circumstances where the loss of this space is acceptable. It is recommended that the phrase “wherever possible” is deleted from the policy for the sake of</p>		<p>Agreed to delete “wherever possible”</p>	<p>It is suggested that Policy SC.I is amended as follows:</p> <p>“The loss of allotments (Aylmer Road, Highgate and Shepherds Hill Railway Gardens sites in Haringey; Fitzroy Park in Camden) and communal garden land in Highgate will be resisted wherever possible;”</p>

	<p>clarity. Camden Council would not permit development that results in the loss of allotments or harms the openness of Metropolitan Open Land. Metropolitan Open Land is also given the “strongest protection” by Policy 7.17 of the London Plan.</p>			
SC2 Criterion II		<p>To ensure effective implementation the policy should specify the locations where this new provision is required to meet identified need.</p>	<p>It’s not clear how we can specify locations of future developments as these will emerge in the course of the life of the Plan. We agree to add “and viable”</p>	<p>It is suggested that Policy SC2.II is amended as follows: <u>“The provision of communal outdoor open space for residents, potentially including areas for additional self-managed allotments or garden land in new developments of 10 or more units – or where there is educational provision – will be actively encouraged, wherever possible and viable. Where such open space provision is delivered it should be positively managed.”</u></p>
EA General		<p>Paragraph 3.2.1 (3rd paragraph) “Will prove vital in ensuring that a sufficient supply of...” - The Plan has identified a growing need for Class B and other business floorspace, including for workshops and</p>	<p>No response.</p>	

		<p>small business units. Furthermore, Tables 2, 3 and 4 (pages 32-34) demonstrate the limited supply of B1 floorspace in the area. Whilst there are policies to protect against the loss of existing floorspace, it is noted that the Plan does not actively seek additional provision to meet need, such as through site allocation policies outside of the strategic allocations in the Local Plan.</p>		
<p>Policy EA1, Criterion I, page 28</p>	<p>“As a general guideline” – this introduces uncertainty regarding how the policy should be applied. It is recommended that the text “As a general guideline” is deleted.</p>	<p>EA1 first paragraph “as a general guideline” – This wording should be removed to make the policy more effective and to avoid discrepancies in its implementation.</p>	<p>Agreed</p>	<p>It is suggested that Policy EA1 (1st paragraph, 2nd sentence) is amended as follows: “As a general guideline. The non-A class use of ground floor units will be permitted where:”</p>
<p>Policy EA1, Criterion III,</p>	<p>Camden’s town centres policies (CS7</p>	<p>EA1.III – The reference to</p>	<p>Agreed</p>	<p>The Councils note the Forum’s agreement that the reference to “impact assessments” should be removed</p>

<p>page 28</p>	<p>and DP12) seek to protect the character, function, vitality and viability of centres through managing the mix of uses in them and ensuring that development does not cause harm to the centre, to its neighbours or to the local area. The reference to “assessed” may be interpreted as a more formal impact assessment, normally used for large retail developments and it is suggested minor re-wording could avoid a possible perception that the policy is asking applicants for additional information. The policy should make reference to both ‘vitality’ and ‘viability’ to bring into line with higher level policies. It is recommended that the wording “is assessed for its potential impact” is replaced with “does</p>	<p>“assessed” may be interpreted as a more formal impact assessment, which the Council would only require in certain circumstances consistent with NPPF paragraph 26. It is recommended that the policy is amended to provide that proposals will be assessed having regard to impacts on town centre “vitality” and “viability”, bringing it in line with higher level policies.</p>		<p>from the policy text.</p> <p>It is suggested that EA1.III is reformatted as a standalone policy and amended as follows:</p> <p>“Any application proposing a loss or change of use of A or B class premises is assessed for its potential <u>must not result in an unacceptable impact on the vitality and viability of, and employment opportunities within, the shopping area.</u>”</p>
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	not result in an unacceptable impact.”			
EA2		The policy should be justified through the inclusion of supporting text.	Policy should be beneath map fig 7 on p29 but was moved because of layout constraints. Justification for the policy is the final paragraph on p29 and the opening para of p30.	No further change is sought. .
EA3	The centre is in Haringey	EA3.I – As written the policy does not allow a change of use from A1 to other A Class Uses unless it can be demonstrated that the existing A1 use is no longer viable. This seems overly onerous and may impact on town centre vitality. The Council’s preference would be to see this brought into line with Policy DM43. Loss of B1 – The loss of employment floorspace is	We were surprised to receive these detailed comments at this late stage as the policy wording was agreed with Haringey at an earlier stage. We would welcome detailed new policy wording from the Borough. We support the suggested changes to policy wording in EA3.III, in line with comments agreed for EA1.	It is suggested that EA3 includes additional text at the beginning of the policy for clarification, a new criterion (I) and the following amendments to current criteria I, II and III: <u>“Aylmer Road Parade comprises the designated Local Shopping Centre at Aylmer Road and Cherry Tree Hill and the non-designated employment land and buildings to the rear.</u> <u>I. Within the Local Shopping Centre, proposals for retail (Class A1) uses will be strongly supported. The use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use will not exceed 50% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre.</u>

		<p>covered by Haringey's Saved UDP Policy (EMP4) and emerging Policy DM40. NP policy EA3.I is less rigorous (i.e. weaker) than these policies on the loss of non-designated employment floorspace. Whilst the Council supports the protection of employment floorspace across the Borough, the Plan's requirements on loss of B1 floorspace are not in conformity with higher level policies. It is recommended this requirement is amended to bring it in line with the Council's strategic policies.</p> <p>EA3.II - The criterion should clearly state what type of provision the Plan seeks to support or include a</p>		<p>II. <u>Retail (Class A1) and Employment floorspace including small office and workshop units (Class B1), particularly small units (100 sq m or less), suitable for SMEs or start-up business, in and around Aylmer Road Parade will be retained for employment use unless they can be shown to be no longer commercially viable or suitable for the existing or an alternative employment use. In such a case evidence should be produced to show that the property has been actively suitably marketed for an appropriate period, in line with higher level policies. 42 months on realistic terms.</u></p> <p>III. The provision of new <u>small office, workshop and retail units (100 sq m or less) of this type</u> within the Aylmer Road area will be actively encouraged.</p> <p>IV. Any application proposing a loss or change of use of A or B class premises <u>is assessed for its potential must not result in an unacceptable impact on the vitality and viability of, and employment opportunities within, the shopping area.</u>"</p>
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		<p>cross-reference to EA3.I</p> <p>EA3.III – The reference to “assessed” may be interpreted as a more formal impact assessment, which the Council would only require in certain circumstances consistent with the NPPF paragraph 26. It is recommended that the policy is amended to provide that proposals will be assessed having regard to impacts on town centre “vitality” and “viability”, bringing it in line with higher level policies.</p>		
TR General		<p>For effectiveness, it is recommended that the policies in this section refer to “major” development rather than “significant”.</p>	<p>See comments below.</p>	
Policy TR1,	“Commercial, service-		<p>We decided that in</p>	<p>The policy already refers to major schemes ie. 10 or</p>

<p>page 37</p>	<p>based and large residential development should make suitable provision...” For effectiveness, the policy should refer to the Government’s definition of major development; a footnote could then define the term as residential development of 10 or more units and commercial development of at least 1,000 square metres or a site area of at least 1 hectare. It is recommended that the policy refers to major development – for both commercial and residential schemes for clarity.</p>		<p>Highgate we needed a smaller definition of “major development” than that applied nationally because of a combination of the terrain, the historic nature of Highgate and the type of development. We consider ten units to be too many and one hectare to be too large an area.</p>	<p>more units in line with the Government definition and circumstances when the Council requires contributions towards public realm works. The Councils and Forum agree that reference to a threshold for commercial development should be included.</p>
<p>Policy TR1, Criterion III and IV</p>		<p>TR1.III and TR1. IV – These requirements are considered too onerous - unless directly related to development, they would not meet the</p>	<p>We would like to retain these requirements – we note that Camden has no concerns about these. The marginal cost to developers of such</p>	<p>To ensure that the Plan appropriately reflects the statutory tests for securing planning obligations, it is suggested that the 2nd sentence of the 2nd paragraph on page 37 is amended as follows: “On site and off site, all new developments will be required to contribute <u>Planning obligations will be secured, where it is legitimate to do so and subject to</u></p>

		key tests for planning contributions set out in NPPF paragraph 206.	requirements would be trivial but the benefits to the community could be considerable.	viability, viable to enhancing the connectivity of the Plan area through <u>measures including</u> the provision of new and improved cycle links, bike parking facilities, footpaths, public transport stops and new through routes”.
Policy TR1, page 37	Supporting text: “in a way that they have not done in the past”. This text should be deleted as provision of these measures is not unprecedented in the context of the Council’s operation of development management. It is recommended that the text “in a way that they have not done in the past” is deleted as it is potentially misleading.		We think this should remain – we have ample evidence that this has been the case. As a compromise, we are prepared to add the word “always” or “sufficiently” to the sentence. We note this comment comes from Camden and the bulk of development that has prompted this wording has occurred in Haringey.	The Councils and Forum agree that text which criticises the local planning authority should be removed from the Plan, in line with similar revisions made during the NPIERS Health Check. Neighbourhood Plans should be positively worded, forward looking documents.
Policy TR2, page 38	For clarity, it is recommended that the title is amended to read ‘Movement of Heavy Goods Vehicles’. It is recommended that the title is	For clarity, it is recommended that the title be amended to read “Movement of Heavy Goods Vehicles”.	Policy title change agreed	For clarity, the policy title should be amended as follows: Movement of Heavy Goods <u>Vehicles</u>

	amended as suggested above.			
Policy TR2, page 38	<p>Use of Construction Management Plans – the policy needs to clarify how “significant development” will be assessed. The Council will usually require construction management plans for larger schemes (i.e. over 10 residential units or 1,000sqm of new commercial floorspace). However, they may also be required on a case by case basis for small schemes, e.g. for confined and inaccessible sites where the construction process can have a significant impact on adjoining properties.</p> <p>It is recommended that the end of the first sentence “significant” is replaced by “major” development to give the policy greater consistency with other policy in the</p>		<p>Accept change from “significant” to “major” but we draw your attention to our note on TR1. The following sentence could strengthen the policy by changing “will” to “must” or “will be expected” in order to meet the community’s expectations that the impact of smaller developments will be taken seriously by the Councils.</p>	<p>The Councils’ suggest that this policy should be amended in line with Camden Council’s comment, i.e. CMPs will be required for major and some other developments where there is likely to be a significant impact on adjoining properties or the operation of the highway.</p> <p>The Forum disagrees with the suggested change and remains concerned that an agreed definition of “significant impact” has not been reached which might weaken the policy’s application. The Councils’ maintain that this needs to be assessed on a case-by-case basis taking into account the type and nature of the proposed scheme and whether the operation of the highway would be negatively impacted. The Councils’ have detailed guidance to inform planning officers when a CMP or SMP should be required. (In Camden: Chapter 8 “Construction management plans”, particularly paragraph 8,10 of Camden Planning Guidance 6: Amenity and Chapter 4 “Delivery and servicing management plans of Camden Planning Guidance 7: Transport ;Haringey currently applies Transport for London guidance, which it would apply in conjunction with Camden Guidance, where appropriate, until such time it adopted its own local guidance).</p> <p>Servicing Management Plans are not required unless the Councils consider there would be an impact on the amenity of the area or the operation of the highway from servicing, e.g. when there is a high level of servicing or the site itself is difficult to access</p>

	Neighbourhood Plan and improve clarity.			
Policy TR2, Criterion I, page 38	<p>The Council secures management plans such as Construction Management Plans and Service Management Plans through Section 106 planning obligations rather than by using a condition because there are also elements that need to be controlled off-site, e.g. parking on the public highway and consultation with neighbours. The third sentence deals with how a CMP is implemented. This would be more appropriately set in the supporting text to the policy.</p> <p>It is recommended that the text is amended to clarify how the Council secures management plans within the supporting text.</p>	<p>TR2.I – Haringey Council generally requires Construction Management Plans and/or Delivery and Servicing Plans for major development and also for some minor development, depending on individual site circumstances. These are normally secured as a condition of a planning consent. The Plan as currently worded is not entirely clear on this matter. Where there are differences in Borough approaches to securing CMPs or servicing plans, this should be set out in the Plan so as to ensure effective implementation.</p> <p>TR2.I - Haringey</p>	<p>Re: CMP - Agreed – we would appreciate new recommended wording from the Councils</p> <ul style="list-style-type: none"> • On Delivery of Service Plan: we need consistency between the Boroughs – Camden is not concerned about this this. • Access issues: we think this unnecessary to spell out in the policy as, of course, the Councils always do a “transport assessment” • Regarding “detailed 	<p>Policy TR2. I. It is suggested that the 2nd and 3rd sentences are amended as follows:</p> <p>“For smaller developments, the Councils will consider the requirement for a CMP or SMP, having regard to <u>access issues a transport assessment and the potential impact on the local road network. It will be designed to keep properties in the vicinity of the development site with the objective of keeping disruption to a minimum. These assessments will be secured through a condition attached to the permission or through a Section 106 planning obligation...</u>”.</p> <p>(The reference to Section 106 will assist with clarity because the Councils have historically used different approaches.)</p> <p>The supporting text should also be amended to clarify that Delivery and Servicing Plans and Servicing Management Plans refers to the same thing (different terminology is used by the respective boroughs).</p>

		<p>requires a Delivery and Servicing Plan (rather than a Servicing Management Plan) for development which is likely to generate significant traffic movement. The policy and/or supporting text should be amended to reflect this.</p> <p>TR2.I – “Having regard to access issues and the potential impact on the local road network” – It is recommended that this is amended to provide that requirements for smaller schemes will be assessed having regard to a “transport assessment”.</p> <p>TR2.I (3rd sentence) – These are detailed requirements for CMPs and Delivery and Servicing Plan</p>	<p>requirements”: we feel these details are appropriate to include in the policy. We note that Camden was not concerned about this.</p> <ul style="list-style-type: none"> • Regarding the merger of II and III: we think these are sufficiently important and distinct to remain separate. We note that Camden was happy with that. • TR2.IV: We don’t agree and note that Camden has no concerns. 	
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		conditions that would be more appropriately set in the supporting text.		
Policy TR3, page 39	<p>“New development defined as significant in size” – as with Policies TR1 and TR2, it is suggested that in place of “significant”, the policy refers to ‘major’ schemes as per comment for Policy TR2 above. In criterion II, the phrase “or it is a significant residential development” is not required as this is already implied by the opening paragraph.</p> <p>It is recommended that the policy refers to ‘major’ development rather than “significant” for effectiveness.</p>		Agreed but noting points above	In the case of parking surveys, it is suggested that the policy clarifies that these will be required for major and other schemes likely to increase pressure for on-street parking, e.g. loss of bays in a CPZ. Parking surveys may be provided as part of a Transport Assessment, where this is required. Further details on parking surveys are set out in the Councils’ planning guidance and in Appendix 2 to the Neighbourhood Plan.
Policy TR3, criterion II	<p>It should be clarified that parking surveys will be sought where a development scheme would result in a loss of on-street car parking.</p> <p>It is recommended that the policy</p>	It is not considered appropriate that all qualifying proposals (i.e. major development and other proposals likely to have significant transport impacts) provide	Disagree - we felt that the policy provides sufficient description of when a parking survey would be needed. Any development that is going to add to the resident	The Councils will generally require parking surveys when a proposal is likely to increase pressure for on-street parking, e.g. loss of bays in a CPZ. There may be small-scale schemes, e.g. the creation of one additional home where it is not appropriate. The action agreed in relation to parking surveys is set out in the row above.

	<p>provides information on the circumstances in which parking surveys will be sought.</p>	<p>parking surveys. To ensure conformity with higher level policies, TR3.II should set out that “Transport Assessments” will be required for such qualifying development and these should include, where appropriate, parking surveys. Transport for London issues Best Practice Guidance on Transport Assessments which Haringey Council expects applicants to have regard to.</p> <p>TR3.II regarding “agreed baseline” – It is not clear what is intended by this requirement or how it would be implemented.</p>	<p>population or the number of visitors should require a survey.</p> <p>We consider the phrase “agreed baseline” has a clear meaning in the context of parking surveys being done before and after developments to allow their impact to be assessed.</p>	
TR3		<p>Appendix 2 (Forum website) sets out key issues, challenges and</p>	<p>We request that Haringey proposes the elements that they require to be</p>	<p>The Councils note that the Forum has taken on board the NPIERS Health Check advice to move a lot of contextual information on Transport to Appendix 2. Following the Examination, the Councils will review this</p>

		<p>additional justification in respect of the Plan's transport policies. However it appears that some requirements are also embedded within this Annex. Any policies or implementation points should be appropriately set out in the policy and supporting text.</p>	<p>moved from the Appendix into the policy section of the Plan. They were moved from the original, much longer draft, at the suggestion of John Slater, our Healthcheck Examiner.</p>	<p>Appendix to identify whether there is a need for further consequential amendments to bring it in line with the rest of the Plan.</p>
<p>Policy TR4, page 40</p>	<p>The policy conflicts with Camden Council's emerging Local Plan which proposes that the Council will seek to secure car free development regardless of PTAL rating (except for essential users where a case can be made). As part of this approach, in the case of redevelopments where there is likely to be a new occupier, the Council will expect car free development. This means that no car</p>	<p>The policy as currently worded is not in conformity with Haringey's emerging Local Plan (Policy DM32) which specifies that proposals for car-free development will only be supported if located where PTAL is 4 or higher <u>and</u> within a CPZ. Whilst recognising that the Plan seeks to reconcile policy approaches between local planning authority</p>	<p>So far as we are aware, we are the most advanced cross-Borough NP in London and this is a good example of the sort of conflict between the two Boroughs' approaches that needs to be resolved. The Forum doesn't have a strong view as to which policy should be adopted but we do think there should be consistency across the Area.</p>	<p>It is suggested that the supporting text should acknowledge that Camden Council is seeking to introduce a car free requirement for the whole of the Borough which is not based on PTAL scores. (This is set out in Policy T2 of the Camden Local Plan submission draft, which Camden expects to adopt by the Summer). This will alert applicants reading the neighbourhood plan of this pending change to Camden's strategic approach to parking matters.</p> <p>Haringey Council is seeking that the policy is consistent with its emerging Local Plan approach on car free/car capped development (Policy DM32), which supports car free development in areas covered by a CPZ and where the PTAL is 4 or higher.</p> <p>The Forum would like the Examiner to rule on this conflict between Inner and Outer London Borough policy. In practice, we don't think our Policy TR4 is inconsistent with Haringey's Policy DM32 as Highgate's</p>

	<p>parking spaces are provided within the site other than those reserved for disabled people and businesses and services reliant upon parking, where this is integral to their nature, operational and/or servicing arrangements.</p> <p>The Council understands that Haringey's emerging Local Plan specifies that proposals for car-free development will only be supported in areas located within PTAL 4 or above and within a Controlled Parking Zone (CPZ).</p> <p>Haringey is defined by the London Plan as an outer London Borough and its unique circumstances have informed the setting of its strategic policies.</p> <p>Camden Council recognises that the neighbourhood plan is tested in terms of conformity with adopted policies in the</p>	<p>areas, it is noted that Haringey is defined by the London Plan as an outer London borough (Camden as inner London) with unique circumstances that have informed the setting of its strategic policies.</p> <p>The Council does not support the Plan's approach for car-free development, as currently worded.</p>	<p>Regarding conformity with emerging DM32, as explained above, we would like this conflict between the two Boroughs' policies to be resolved, with the aim of consistency for the Highgate area.</p>	<p>particular circumstances conform with the conditions laid out in that policy.</p>
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	<p>development plan, rather than emerging policies. It would, however, be the Council's position that the 'car free' requirement will apply across the whole of the Borough, including Highgate, if the approach is found sound at the Local Plan Examination. It is vital that the Council is able to take a borough wide approach on this matter which is critical to addressing the problems associated with poor air quality and congestion which affect the whole of Camden.</p> <p>It is recommended that the policy includes acknowledgement of the potential for forthcoming changes to the strategic planning context in relation to 'car-free development' in Camden, which the Council is committed</p>			
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	to introduce through its emerging Local Plan. This could be included as part of the supporting text for applicants.			
Policy TR4 Criterion V		It is not clear what is meant by the term “public parking”. In addition, it is unlikely that the Council could refuse all proposals which would result in <u>any</u> loss of residential parking. Haringey normally requires a parking stress survey if there are concerns with the potential impact of on-street parking.	Regarding “public parking”, we mean to this to imply any parking which is not private parking and consider this to be obvious. If Haringey has an alternative phrase to suggest, we are happy to consider it.	For conciseness, Haringey Council suggest that Criterion TR4.V is deleted as this duplicates the requirements set out in TR4.III. The Forum do not agree with this and would support the existing wording or alternative wording for TR4.III that made it clear that the policy covered <i>all</i> public parking, not just that governed by a CPZ.
Policy TR4 Criterion VI		“harm a building’s setting” – This criterion is considered too onerous and not consistent with the NPPF requirement to plan positively. The policy should be made more flexible, allowing for consideration of adverse impacts on	Regarding “harm to a building’s setting”: we do not regard this to be too onerous and note Camden had no issue with it.	It is noted that references to a building’s setting normally refer in the planning system to listed buildings. For clarity and effectiveness it is suggested that TR4.VI is amended as follows: “Create, or add to, an area of car parking that harms <u>would have an adverse impact on local character or a building’s setting</u> , or is visually detrimental to conservation areas”.

		local character, which could include the historic environment and heritage assets (where reference to the impact on setting would be more appropriate).		
Policy TR4, criterion VII and VIII, page 40	There is a formatting issue as these criteria do not directly follow on from the text at the beginning of this section. It could read as suggesting that adequate soft landscaping should be resisted. It is recommended that minor redrafting occurs for the sake of clarity and effectiveness in applying the policy.	This criterion should include a qualifier that “preservation” (i.e. means of enclosure, features of a forecourt or garden) <u>may be</u> required, rather than will be required, with proposals assessed having regard to the significance of heritage assets and their setting. The requirement for “re-provision” is considered too onerous.	We don’t share this concern because the policy’s introductory sentence refers to “highways or the environment”. We note that this was not a concern raised by Haringey. We do not regard this to be too onerous and note Camden had no issue with it.	It is suggested that the formatting is amended for clarity, so that VII and VIII sit separately from the rest of the bulleted criteria. It was agreed that the criterion could be worded more positively referring to the impact on “local character” which would provide more flexibility when the councils consider individual schemes.
Policy TR4, criterion VIII, page 40	“Surface run-off” should say surface water run-off. It is recommended that the word ‘water’ is added for clarity.	TR4.VIII – Reference to surface “water” run-off should be made for clarity.	Agreed	For clarity, it is suggested that TR4.VIII is amended to refer to “surface water run-off”.
Policy TR5, criterion I,	The principal concern for the Council is that	The term “area of high parking stress”	Regarding Camden’s	The Councils’ suggest the following wording: “not adversely reduce the capacity” rather than loss of any

<p>page 42</p>	<p>crossovers do not adversely reduce the capacity for on-street parking. Parking transferred to a driveway (as the second part of I refers), can only be used by the occupants of a particular site/development whereas on-street car parking may be used by all residents in the street.</p> <p>It is recommended that the policy refers to the impact on the net capacity for on-street parking that can be accessed by all residents.</p>	<p>needs to be clarified in order for the policy to be effective. Haringey Council does not define such areas in its Local Plan. If they are to be included in the Plan, for implementation purposes, these should be defined and/or mapped (and supported by clear evidence).</p> <p>TR5.I appears to set a blanket restriction on dropped kerbs within CPZs. This is not in conformity with Haringey's emerging Local Plan (Policy DM33) which provides for a more positive approach (i.e. dropped kerbs and crossovers not supported within a CPZ if this results in a reduction of on-street parking capacity).</p>	<p>comments - Agreed. We think the phrase "should not lead to a loss of net capacity for on street parking" can be added to end of the first sentence of the preamble of TR5.</p> <p>Regarding "areas of high parking stress": we feel these areas are clearly defined in the supporting evidence to the Plan. Virtually all roads in the Plan area are included.</p> <p>Regarding "blanket restriction" we do not understand the Haringey comment, as surely any provision of new dropped kerb would result in a loss of on-street parking capacity. Please refer to comments above about Camden's comments about</p>	<p>capacity to allow the impact to be assessed on a case-by-case basis.</p> <p>The Forum doesn't agree to the use of "adversely" here as it is considered this may weaken the application of the policy.</p> <p>Haringey suggests that for effective implementation, the term "area of high parking stress" is defined within the Plan (e.g. any area covered by a CPZ). In addition, to provide for more flexibility when assessing impacts on a case-by-case basis, we suggest that the 1st paragraph of the policy is amended as follows: "<u>...provision of off-street parking accessible by dropped kerbs will not be supported in areas covered by a CPZ where this would adversely reduce on-street parking capacity within the CPZ.</u>"</p> <p>The Forum and Haringey agree that "high parking stress" could be defined by "areas covered by a CPZ".</p> <p>The Forum also seeks to identify certain roads within a CPZ which would not be defined as "high parking stress" areas for the purpose of the policy implementation. Haringey Council does not support this approach.</p> <p>In addition, the Forum would like to add the streets around Highgate Primary School (to be named during redrafting) as streets outside of a CPZ which nevertheless suffer high parking stress.</p> <p>Haringey Council considers that Highgate Primary School experiences acute congestion at limited hours rather than suffering from high parking stress, as</p>
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			net loss of parking.	suggested by the Forum. The Forum considers there is severe parking stress during the 39 weeks of school term time. These are the only public highways in Haringey N6 outside of a CPZ and so attract high levels of contractor, allotment user and commuter parking even outside term time.
Open space P.46	Categories of open space in the plan area - "major open spaces" – the text "to include, but not limited to..." suggests there are other major open spaces that the Plan has not identified. As this designation is created for the purposes of the Highgate Neighbourhood Plan, all the relevant spaces should be identified. It is recommended that the text "to include, but not limited to" is removed to clarify which areas are "major open space".		While we have listed those areas we understand to be major open spaces, we were keen to ensure that no open space fell through the net if it was not clear whether it was a Local Green Space or major open space.	The Forum has proposed designated Local Green Spaces separately in Fig. 9. It was agreed that for clarity and effectiveness the 1 st sentence of the definition of major open spaces (page 46) could be amended as follows: 'Multifunctional areas of outstanding importance in local, regional or national terms to include but not limited to . These are Hampstead Heath...'
Policy OS1, page 46	"Any new" in the first sentence of the policy is superfluous. For the sake of clarity it should	The Council considers that OS1 is too onerous and not consistent with	Camden amendment agreed. Camden does not	For clarity and to ensure the requirements are distinguished from those normally associated with designated vistas/viewing corridors, it is suggested that Policy OS1 is amended as follows:

	<p>be removed. It is recommended that the first sentence refers to “Development”.</p>	<p>the NPPF requirement to plan positively. This is particularly in respect of the first part of the policy, which provides that it applies to “any new development which is visible from Highgate’s areas of major open spaces”, along with criterion OS1.1. In an urbanised setting like London, it is unreasonable to expect that all development visible from open spaces should be subject to these criteria/constraints.</p> <p>London Plan policy 7.4 (Local Character) is considered to provide an appropriate policy framework for managing development on and adjacent to open spaces. It is</p>	<p>share Haringey’s concerns and does not have a problem with the Forum’s definition of ‘major open spaces’. The Forum believes we are not being unduly proscriptive in this policy, as almost the entire Plan area is within a conservation area a great part of the remit of the Plan is to protect and enhance the conservation areas with appropriate and sensitive development.</p>	<p>“Any new dDevelopment which is visible from adjacent to Highgate’s areas of major open space (as named above) should respect its setting and not be visually intrusive. New dDevelopment visible from adjacent to Highgate’s major open spaces should ensure that:”</p> <p>Also, it is suggested that Criterion I is deleted as criterion III. meets the intent of this policy.</p>
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		<p>acknowledged that the policy has been amended from earlier drafts and OS1.III is considered to better address the matter of local character, notwithstanding the above comments.</p> <p>“Major open spaces” is not a recognised definition. To ensure conformity with higher level policies, the Plan policies should refer to “designated open spaces” as this will provide an appropriate framework for policy implementation.</p>		
<p>Policy OS2, criterion I Page 47</p>	<p>The first sentence of this criterion should be qualified with “where possible” as it would be unduly restrictive to expect trees to be protected in all instances. If they are low quality, they may not require protection. The same comment</p>	<p>OS2.I “developers and others” – This should be rephrased to require that “new development” will be expected to provide suitable replacements.</p> <p>OS2.I - The first sentence of this</p>	<p>Agreed to inclusion of “where possible”. The Forum understands the concern with ‘like for like’ and proposes the addition of the qualifying phrase “where appropriate or feasible” after</p>	<p>To provide for greater flexibility in implementation, it is suggested that Policy OS2.I is amended as follows:</p> <p>“Within the conservation areas or when protected by a TPO, specimen, veteran and mature trees and mature vegetation, which have townscape, ecological or amenity value should be retained, <u>where possible</u>. If such loss is shown to be absolutely necessary, developers and others new development will be expected to provide suitable replacements, <u>with like for like replacement being supported where appropriate and</u></p>

	<p>applies in relation to the last paragraph of the supporting text.</p> <p>It is not appropriate to apply an expectation that only 'like-for-like' trees will be acceptable. The Council uses guidance set out in BS8545 "Trees: from nursery to independence in the landscape" to assess tree planting and mitigation.</p> <p>While semi-mature trees can provide an 'instant' visual impact, smaller/younger trees may also be appropriate in helping to sustain an attractive treed environment, as they can be particularly successful in adapting to their surrounding environment and more sustainable over the longer term. Semi-mature trees, by contrast, may require more intensive pruning</p>	<p>criterion should be qualified with "where possible" as it would be unduly restrictive to expect trees to be protected in all instances.</p> <p>OS2.1 – The requirement for "like for like" replacement of trees is not considered appropriate or feasible.</p>	<p>"like for like".</p>	<p><u>feasible</u>".</p>
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	and watering affecting survival rates. Visual impact should not be the only consideration taken into account. It is recommended that the policy introduces greater flexibility relating to replacement tree planting.			
Policy OS2 criterion II		OS2.II (1 st sentence): “Developments will be expected to preserve or enhance... vistas to major open spaces”. This criterion repeats Policy OS.1 which the Council has set out its objections to above.	Camden does not share Haringey’s concerns and does not have a problem with the Forum’s definition of ‘major open spaces’. The Forum believes we are not being unduly proscriptive in this policy, as almost the entire Plan area is within a conservation area a great part of the remit of the Plan is to protect and enhance the conservation areas with appropriate and sensitive development.	To bring the policy in line with OS1, it is suggested OS2.II is amended as follows: “Developments will be expected to preserve <u>conserve</u> or enhance the character of Highgate’s conservation areas, and vistas to <u>setting of</u> the major open spaces.”
Policy OS2,	Where a tree is	Management of	The purpose of this	The Councils and Forum discussed the issues around

<p>critterion III, page 47</p>	<p>protected through a TPO and it is proposed that the tree is to be removed, the Council will condition a replacement taking into account the constraints of the site. However, we would not require replacement provision for pruning works to mature, veteran or specimen trees as this would only be approved where deemed to be necessary and can help in facilitating a tree's retention. Pruning is an essential element of robust tree management and is likely to be preferable to a tree being cut down altogether. Biodiversity value will often remain even if a tree is dead or dying (e.g. an insect rich monolith). It is recommended that mitigation for tree pruning is removed as this is</p>	<p>diseased trees is considered a public health and safety issue, rather than a planning issue. It would be unduly onerous to expect that landowners re-provide trees where they have been required to incur costs related to management on health and safety grounds.</p> <p>OS2.III - Where a tree is protected by a TPO and it is proposed that the tree is to be removed, the Council will condition a replacement taking account individual site circumstances. It is not considered appropriate to seek replacement provision.</p>	<p>policy is to protect the many ancient mature broadleaf trees – relics of ancient woodland but now in private gardens. Disease in these trees is often used as an excuse for excessive pruning and ultimate removal. We would welcome advice on a better way to word this policy to further this aim.</p>	<p>tree pruning at the meeting.</p> <p>As well as a potential requirement to prune trees for health and safety reasons, this can also help to facilitate a tree's retention by removing diseased material. Imposing a requirement for replacement planting could be counter-productive by dis-incentivising pruning altogether.</p> <p>Also if the Councils receive a section 211 notification to remove a tree in a conservation area, they cannot condition that a replacement tree is planted. If the tree is subject to a TPO or the tree is proposed to be removed as part of a planning application, then the Councils can condition a replacement.</p> <p>It is suggested that criterion I is modified as follows:</p> <p>“Within the conservation areas or when protected by a TPO, specimen, veteran and mature trees and mature vegetation, which have townscape, ecological or amenity value should be retained. If such loss is shown to be absolutely necessary developers and others will be expected to submit proposals for suitable replacements, i.e. like for like, if a mature tree is found to be diseased and requires works significantly reducing its amenity value, appropriate replacement planting will be sought as close to the original site of the tree as possible. Veteran trees should be retained where possible.”-</p> <p>The above modification would also remove the word “specimen” from this criterion because specimen trees can sometimes be very small and young.</p>
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	not likely to be an enforceable or reasonable approach and may be counter-productive to encouraging active tree management by landowners and developers.			
Policy OS2, page 47	“Developers and others”, replace with “new development” for the sake of clarity and to reflect commonly used terminology. It is recommended that the above change is made to the wording of this policy.		Change to “new development” agreed	This matter is addressed in the schedule above for comments on OS2 criterion I.
Policy OS3		The proposed designation of the open land at Hillcrest as a Local Green Space (LGS) is not in conformity with Haringey’s emerging Local Plan, including Policy SA44 (Hillcrest). Policy SA44 covers the extent of the land proposed by the	Hillcrest: While not in agreement, we recognise the Haringey Inspector’s ruling on development on the Hillcrest estate. However, we would like to do all we can within the Neighbourhood Plan to protect as much green space on the estate, as	Haringey’s emerging Policy SA44 sets requirements in respect of landscaping/open space provision and management at Hillcrest estate. It also states that any development will need to accord with a masterplan, prepared with resident involvement. This will provide an opportunity for the Forum to engage in the future of this site. Haringey Council maintains that the LGS for Hillcrest should be deleted as this undermines the aims and potential delivery of SA44. The Councils have advised the Forum that provision of children’s playgrounds could be set out in the proposed CIL spending policy (please see above).

		<p>Forum for LGS. The Council has allocated Hillcrest as “a housing investment opportunity to create additional residential development” which is considered essential to the delivery of the spatial strategy for the Borough.</p> <p>Haringey’s Local Plan examination hearings were carried out from August 23rd to September 8th 2016. The Planning Inspector raised no significant issues in respect of the soundness of the strategic approach and development principles for policy SA44. Additionally, through the hearings it was established that this site should be considered Previously</p>	<p>possible. In addition, we would like to ensure that CIL monies are spent on providing community facilities, such as children’s playgrounds, for residents of the Estate. We would welcome advice on how this can be achieved.</p> <p>LGS general: The Forum thinks that LGS is a stronger designation than those currently protecting these spaces and would argue very strongly for keeping all these spaces under LGS, as we are empowered to do under NPPF (76).</p>	<p>The Forum believes that Highgate’s housing targets (300 additional units to 2026) will be satisfied without development at Hillcrest and wishes to retain the proposed LGS designation at Hillcrest in policy OS3</p>
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		<p>Developed Land.</p> <p>The NPPG sets out guidance on the designation of LGS to ensure it is consistent with local plans.</p> <p>The remaining proposed 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, including Highgate Allotments, Shepherd's Hill Railway Gardens Allotments and Alymer Allotments. The merit of including the LGS designation to these already designated open spaces, which the Council will</p>		
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		protect through the Local Plan, should be considered having regard to NPPG.		
Policy OS4, page 51	<p>“unless the need for, and benefits of, the development in that location clearly outweigh the loss” – while the Council supports the identification of green corridors, this wording is considered too onerous as <i>all</i> developments would need to provide justification for why a proposed scheme is preferable to retaining the land in its existing use.</p> <p>It is recommended that the policy maintains its recognition of the value provided by these green corridors but allows the Council to determine whether a scheme would give rise to significant harm to these</p>	<p>Strategic ecological corridors are designated in Haringey’s Local Plan having regard to the Mayor’s All London Green Grid. Higher level policies provide protection against development where this would adversely impact on the function and integrity of these corridors. The Neighbourhood Plan Appendix 3 map of “possible ecological corridors” is not in conformity with Haringey’s established designations and it is not clear whether any evidence has been used to support the these additional designations.</p>	<p>We don’t agree with this amendment – we think the maintenance of green corridors is an essential component of protection for local biodiversity linking our open spaces. We would be concerned about the use of the word ‘significant’.</p> <p>In addition: the ecological corridor map (Appendix 3) was drawn on advice and agreed with our Healthcheck Examiner.</p>	<p>For clarity, it is suggested that the policy title and requirements, along with Appendix 3 map, be amended so that the term “ecological corridors” is replaced with a new local designation, “Highgate’s Green Grid”. This would ensure the requirements are clearly distinguished from those associated with the designated strategic ecological corridors in the Councils’ respective Local Plans.</p> <p>To maintain the recognition of value provided by Highgate’s Green Grid but to provide for greater flexibility in considering the impact of proposals, it is suggested that Policy OS4, 1st sentence, is amended as follows:</p> <p>“Development should not harm or reduce support the ability of ‘ecological corridors’ <u>‘Highgate’s Green Grid’</u> (detailed in Appendix 3 on website) to act as an element in the local ecological network, unless the need for, and benefits of, the development in that location clearly outweigh the loss. The impact of a proposal on the Green Grid will be assessed against its wider benefits to the local area.”</p>

	<p>features. There should not be a requirement for all planning applications within these areas to be supported by evidence assessing the impact of the proposal on the relevant corridor.</p>	<p>OS4 (1st paragraph) - Notwithstanding the above, the requirement that all developments would need to provide justification for why the scheme is preferable to retaining the land in its existing use is considered too onerous.</p>		
<p>Policy OS4, page 51</p>	<p>1st paragraph, 2nd sentence – addresses detailed points about ecological surveys which should be set in the supporting text to the policy. It is recommended that the above change is made to the wording of the policy for the sake of clarity.</p>	<p>These are detailed requirements for ecological surveys that would be more appropriately set in the supporting text.</p>	<p>The wording in the policy has been already changed and agreed, in line with Borough recommendations and we think it should stand.</p>	<p>It is suggested that the wording in Policy OS4, 1st paragraph 2nd sentence remains in the Plan but is moved to the supporting text as a policy implementation point.</p>
<p>Figure 11, Page 53</p>	<p>The map refers to “The Camden, Haringey...Conservation Areas”. Their correct titles are the Highgate Conservation Area (LB</p>		<p>Agreed</p>	<p>For accuracy, it is suggested that Figure 11 is amended to appropriately refer to the Highgate Conservation Area.</p>

	Camden) and the Highgate Conservation Area (LB Haringey). It is recommended that the map re-labels the above mentioned conservation areas for the sake of clarity.			
Policy DH2, Page 55	The policy should refer to character and appearance, rather than character or appearance as both are relevant in this context. It is recommended that “or” is replaced with ‘and’ to ensure the policy is effective.	Suggest amending “character or appearance” to “character and appearance”.	Agreed	To help ensure effectiveness and to reflect changes agreed elsewhere in the Plan, it is suggested that Policy DH2, 1 st sentence, is amended as follows: “Development proposals, including alterations or extensions to existing buildings, should preserve <u>conserve</u> or enhance the character of <u>and</u> appearance of Highgate’s conservation areas, and respect the setting of its listed buildings and other heritage assets.”
Policy DH5, Page 57	The clause relating to “rooflights” in the first sentence could be removed because the policy references to roof extensions and dormers in this first sentence also apply to rooflights. If amended the sentence would read: Roof extensions, dormers and rooflights		Rooflights: agreed	Camden’s suggested change to the text (in 2 nd column) was agreed between the Councils and Forum.

	<p>should...” It is recommended that specific reference to “rooflights” is removed in the first sentence and included with roof extensions and dormers for the sake of clarity.</p>			
<p>Policy DH5, Page 57</p>		<p>Parts of this policy are considered overly onerous and not consistent with the NPPF requirement to plan positively. This includes where the policy requires that: roof extensions and dormers should be restricted to the rear; roof lights should be confined to the rear or hidden slopes; and satellite dishes and telecommunications equipment should not be sited at the front of buildings in conservation areas.</p> <p>It is suggested that</p>	<p>We don’t think that our policy is “overly onerous and not consistent with the NPPF requirement to plan positively”. Our policy is designed to protect and enhance our conservation areas. See our comments below.</p>	<p>The Councils have adopted detailed planning guidance to assess the appropriateness of roof alterations. (Camden Planning Guidance 1: Design paragraphs 5.6 to 5.29 and Haringey Highgate Conservation Area Appraisal and Management Plan, including companion Design Guide). It is suggested these specific references are included in the supporting text.</p> <p>To provide for greater flexibility in considering proposals, it is suggested that DH5 is amended as follows:</p> <p>“and be restricted to the rear except where they are part of the established local character <u>and would not adversely impact on the amenity of the area or the significance of heritage assets and their setting</u>”. This will ensure that proposals are considered on their merits having regard to individual site circumstances”.</p>

		<p>the policy is amended to provide that proposals should not adversely impact on amenity, local character or the significance of heritage assets and their setting. This will ensure that proposals are considered on their merits having regard to individual site circumstances.</p>		
<p>Policy DH5, page 57</p>	<p>While the policy considerations will generally be effective in dealing with terraces or groups of similar buildings, the considerations relating to dormers etc. is less applicable to individual buildings. Camden Planning Guidance 1: Design states alterations are <i>likely</i> to be acceptable where they “are architecturally sympathetic to the age and character of the building and retain the</p>	<p>See above.</p>	<p>We agreed this wording with the Councils. Our intention is to protect and enhance the conservation area. While we understand they want increased clarity in the policy wording, we don’t want to undermine the intent of the policy. We would welcome suggested rewording that takes account of this.</p>	<p>No other changes are sought in relation to this point.</p>

	<p>overall integrity of the roof form". While the policy does refer to existing local character as determining the acceptability of the scheme, in isolation this would provide a partial understanding of the appropriateness of development schemes where this involves detached housing in larger plots.</p> <p>It is recommended that the policy acknowledges circumstances in which roof alterations are likely to be acceptable to ensure there is a positive approach to planning.</p>			
<p>Policy DH5, Page 57</p>	<p>"Re-roofing materials should match the original" – as worded, this would not take into account buildings where the existing roofing materials are poor quality or unsympathetic when compared to surrounding buildings</p>	<p>See above.</p>	<p>See above</p>	<p>It is suggested that the policy is amended as follows:</p> <p>"Re-roofing materials should match the original <u>avoid the use of inappropriate substitute materials that can erode the character and appearance of buildings and areas</u>". This change will allow a degree of flexibility, e.g. when matching materials cannot be sourced or there is an opportunity to create a 'harmonious contrast'.</p>

	<p>and roofscape. It may also be desirable in some circumstances to create a 'harmonious contrast' to distinguish the roof of one property from its immediate surroundings which the current wording would prevent from happening, contrary to paragraph 60 of the National Planning Policy Framework.</p> <p>It is recommended that the policy refrains from being overly prescriptive. It is appropriate for re-roofing materials to take into account the character and design of the property and its surroundings to ensure that the overall design is contextually responsive.</p>			
DH5				<p>Taking account of above comments, the Councils and Forum have agreed a revised consolidated version of this policy:</p> <p>Roof extensions, or dormers and rooflights should respect the existing roof form in terms of design, scale,</p>

				<p>materials and detail and be restricted to the rear except where they are part of the established local character and would not adversely impact on the amenity of the area or the significance of heritage assets; rooflights should be confined to the rear or hidden slopes; re-roofing materials should match the original <u>avoid the use of inappropriate substitute materials that can erode the character and appearance of buildings and areas.</u> Chimneystacks should be retained where they positively contribute to the character of the conservation area. Satellite dishes and other telecommunications equipment should be located discreetly and not be sited at the front of buildings on the roofline in conservation areas.</p>
DH6, Page 57		<p>DH6 (1st paragraph) "Removal of original boundary walls, gate piers and railings should be permitted only where justifiable due to structural condition" – The policy as currently worded does not take into account Permitted Development rights for which works to front boundaries may not require planning permission.</p>	<p>We strongly disagree with this amendment. This policy was actually included on advice from Haringey officers to help protect original boundary walls. We worked closely to agree the policy wording. We note there is no objection from Camden.</p>	<p>There may be instances where existing boundary walls, gate piers and railings are not good design quality or detract from the character of the area, which the policy would prevent from being replaced with something more sympathetic. The following amendments to the text are suggested as follows:</p> <p>"The removal ofOriginal boundary walls, gate piers or railings should be permitted <u>should be retained only where unless this is necessary due to the condition of a structure or replacement provision is proposed which would enhance the character of the area. justifiable due to their structural condition."</u></p> <p>It would also be helpful if the supporting text clarified that permitted development rights apply to certain developments and therefore, planning consent may not be required. This would help to manage public expectations of what the policy is able to achieve.</p>
Policy DH7, page 58	The proposed policy duplicates Camden	It is acknowledged that this policy has	This policy was developed with	It is suggested that Policy DH7 and the supporting text is amended as follows:

	<p>Council's existing basement policy (Camden Development Policies 2010, DP27) in a number of respects, is not supported by locally specific evidence and does not provide further protections that are reasonable or implementable. It applies elements of both Camden's adopted and emerging policy to the whole of the neighbourhood area but as worded, it conflicts with the way in which this framework is intended to operate. A particular concern is the proposal for 'enhanced basement impact assessment'. Camden Council already applies a rigorous basement impact assessment, based on expert and locally specific evidence and a best practice methodology. More detail on</p>	<p>been amended following feedback from the Councils and the NPIERS plan review service. However, Haringey Council considers that the policy is still overly prescriptive, not consistent with NPPF (particularly paragraph 193) or in conformity with the Council's adopted and emerging Local Plan policies.</p> <p>We have particular concerns with the proposal for an 'enhanced basement impact assessment'. Haringey currently has policies in place to manage this type of development and these will be both supplemented and strengthened through a new Policy DM18 (Residential Basement Development and</p>	<p>close working with both Boroughs' planning and planning policy departments. Our basement policy is trying to provide consistency of approach between Camden and Haringey. The length of time that has passed in drawing up the Plan has led to some parts being superseded by the Boroughs' Local Plans. We welcome Camden's recent Article 4 Directive on basements and note that multiple representations and meetings with the Forum may have contributed in some measure to this decision.</p> <p>On the BIA: we felt that the evidence provided by Camden's own survey on the</p>	<p>Section 1 could be renamed 'Impact Assessment requirements', this would involve removing the word "enhanced".</p> <p>As hours of operation cannot form planning policy, the following amendments to section 2 are suggested:</p> <p>"2. Where a Construction Management Plan (CMP) is secured, it a condition of planning consent, this plan should be submitted, and must be approved by the LPA, prior to the commencement of works. or as required by the condition. Unless justified by exceptional circumstances (for example, concrete pouring), the conditions should normally require works to be limited to 8am-6pm on Mondays to Fridays only. High impact works, including all demolition and concrete breaking, should be restricted to 9am-noon and 2pm-5.30pm on weekdays. At no time should there be any works on Saturdays, Sundays or public holidays."</p> <p>In the supporting text: it is suggested that the first sub-section is relabelled, "Basement Impact Assessments", removing the word "enhanced".</p> <p>At the end of the fourth paragraph of the supporting text, additional text is proposed: <u>"...The Forum's Plan seeks to build on both Camden and Haringey's emerging policies and ensure that applications for basement development across the Plan area are considered in a consistent and robust manner. Applications for basements in Highgate must therefore meet the requirements of the relevant borough policy and supplementary guidance and Policy DH7."</u></p>
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	<p>Camden Council's concerns are set out below: Enhanced basement impact assessment As the policy does not set out what this should contain, it is unclear whether this would be required in addition to the Council's existing Basement Impact Assessment (BIA). This would potentially cause confusion, leaving applicants and planning officers without a clear indication of how to respond. The Council's Basement Impact Assessment (BIA) is based on a detailed and established methodology prepared by experts using locally specific evidence in the Camden geological, hydrogeological and hydrological study (by ARUP). The BIA methodology is a</p>	<p>Light Wells), requiring that proposals are accompanied by a rigorous basement impact assessment, to be based on a best practice methodology and incorporating a risk-based assessment approach. This emerging policy has been considered at the Local Plan examination hearings and no significant issues in respect of soundness were raised by the Inspector. Once adopted, the Council will prepare further guidance to help support implementation of DM18.</p> <p>DH7.2 sets out many details on CMPs which would be more appropriately set in the supporting text.</p>	<p>impact of basements (in our Appendix 1 Evidence) was sufficient evidence that BIAs were required in the Plan Area.</p> <p>On the matter of working hours: we have followed an initiative by Westminster Council and were under the impression that both Boroughs were supportive of this.</p> <p>Our issue is not with Camden's strategic approach to basement development but in its application, and we recognise that planning enforcement is beyond the remit of the Neighbourhood Plan. Overall, we would like to see a commonality of approach across</p>	<p>In the "Protection for Neighbours sub-section" the following amendments are suggested:</p> <p>"It is difficult to quantify the effect a basement construction can have on residents of adjacent properties, though the noise, vibrations and damage over prolonged periods have both financial and mental health implications (see the Camden Evidence Report Feb 2016). This policy seeks to mitigate, as far as possible, The effect of construction on neighbouring residents <u>should be mitigated as far as possible.</u> The CMP should seek to ensure that construction noise, vibration and dust are kept to a minimum and HGV/LGV movements do not significantly increase traffic congestion placing unreasonable stress on local residents, given that works can take up to two years to complete. <u>Construction Management Plans should also include limit on hours of construction. Construction working hours do not fall under planning legislation under the Control of Pollution Act 1974. Camden's construction working hours are set out in Camden's Guide for Contractors Working in Camden. The Neighbourhood Forum recommends that, unless justified by exceptional circumstances (for example, concrete-pouring), work on basements should be limited to 8am-6pm on Mondays to Fridays only. High impact works, including all demolition and concrete breaking, should be restricted to 9am-noon and 2pm-5.30pm on weekdays. At no time should there be any works on Saturdays, Sundays or public holidays.</u> These limited hours of construction in Part 2 of the policy have been introduced recently by the Royal Borough of Kensington and Chelsea <u>as part of their Code of Construction Practice.</u>"</p>
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	<p>riskbased assessment responding to the specific impacts of a scheme and its location; therefore issues particular to Highgate will be addressed through this approach. It will be confusing for applicants whether they will be required to provide the Council's BIA or the "enhanced" approach identified by the Forum, or potentially both. This is contrary to paragraph 17 of the NPPF which seeks a "practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency".</p> <p>Construction Management Plan (CMP)</p> <p>The Council secures construction management plans through a Section 106 agreement and not by</p>	<p>The matter of working hours cannot form part of planning policy as it is covered by other legislation.</p>	<p>the Plan Area and look to the Councils to produce a policy wording which encompasses this.</p>	
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	<p>planning condition. This is because there may be elements that need to be controlled off-site (outside of the red line), such as parking on the public highway and consultation with neighbours. Details relating to CMPs would be more appropriately set in the supporting text to the policy.</p> <p>Working hours This matter cannot form part of planning policy as it is covered by other legislation. The Council sets working hours out in the Code of Construction Practice.</p> <p>It is recommended that the policy removes reference to 'enhanced basement assessments'. No evidence has been provided to justify a departure from Camden's strategic approach to basement development (as set</p>			
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	<p>out in Policy DP27 of Camden Development Policies and Camden Planning Guidance 4 (CPG4): Basements and lightwells). Text relating to Construction Management Plans and working hours should be amended to reflect how the Council addresses these matters.</p>			
<p>Policy DH8, page 60</p>	<p>The policy as worded is not proportionate because not all development will necessitate requirements for waste management facilities. It is recommended that the policy specifies that the requirement applies to all new buildings rather than all new development or where a requirement for waste facilities arises.</p>	<p>The policy should be amended slightly recognising that not all development will necessitate requirements for waste management facilities (i.e. the policy could specify that the requirement applies to new development “where appropriate”).</p>	<p>We are unclear which developments will “not necessitate requirements for waste management”</p>	<p>The Councils have clarified their position in respect of waste management facilities. Both confirmed they will seek external storage facilities wherever possible where net additional dwellings are being created but acknowledge this may not be possible due to the configuration of some smaller sites (e.g. conversions of existing buildings). It is therefore acceptable for residents to leave bins on the pavement for collection on a specified day for smaller developments. For clarity, the Councils suggested that Policy DH8, 1st sentence, is amended as follows:</p> <p><u>“Where appropriate, all proposals for new development buildings will be required to ensure that waste facilities are well designed and sensitively integrated into developments”.</u></p> <p>The Forum is concerned that this proposed wording would not prevent a repeat of what has happened in the Miltons area, where hundreds of bins remain on</p>

				<p>pavements 24/7. The reason for the inclusion of this policy is specifically to prevent this happening elsewhere in Highgate. Haringey has consistently maintained that it is not possible to have timed collections, and as a result the bins are both an eyesore and health hazard. Going forward, it is likely that less, rather than more, will be spent on refuse collections. We cannot see a situation where well designed, integrated waste facilities would not be 'appropriate'.</p> <p>The Councils' maintain that some flexibility is needed based on the nature of the development.</p>
<p>Policy DH10, page 62</p>	<p>The first criterion 1. is particularly prescriptive. It sets limitations on the range of acceptable uses in back gardens. This is more restrictive than Camden's adopted policy approach which resists "development that occupies an excessive part of a garden, and where there is a loss of garden space which contributes to the character of the townscape" (paragraph 24.20 of Camden Development Policies). The Forum has not</p>	<p>Overall the policy is not considered to be worded positively, putting it at odds with the NPPF. This includes DH10.1 which sets limitations on the range of acceptable uses in back gardens making it particularly prescriptive. Haringey's emerging Policy DM7 sets out a presumption against the loss of garden land, with additional strategic requirements for</p>	<p>Our policy wording has been agreed with the Councils and our consultants. The list of acceptable uses was suggested to us as a part of this process. We don't feel these are over prescriptive as they are used as examples. We welcome Haringey's policy DM7 and consider that we are in conformity with it.</p> <p>DH10 (2) amendment agreed</p>	<p>To ensure consistency with the respective Local Plans, it is suggested that Policy DH10.1 wording is replaced with the following:</p> <p>"There will be a presumption against the loss of garden land in line with higher level policies."</p> <p>For clarity, a minor amendment is suggested for Policy DH10.2, 1st sentence, as follows:</p> <p>Other Backland development will be subject to the following conditions:"</p> <p>For flexibility in implementation, it is suggested that Policy DH10.2(III) is amended to provide that proposals (i.e. extensions and alterations) should be carried out in materials that deliver high quality design and reinforce local distinctiveness. This will provide that the policy intent is retained but without being overly prescriptive, in line with the NPPF.</p>

	<p>provided evidence to justify this more restrictive approach. Criterion 2. – suggest removing the first word ‘other’ as it is assumed these conditions apply to all backland development.</p> <p>It is recommended that criterion 1. is amended to ensure there is greater consistency with Camden’s adopted policy. A minor amendment to criterion 2 would improve clarity.</p>	<p>backland development proposals, which the Plan should be in conformity with.</p> <p>DH10(2) - Suggest removing the first word ‘Other’. It is assumed these conditions apply to all backland development.</p> <p>DH10(2)(II) - Suggest amending wording to read more positively, (e.g. should provide satisfactory mitigation measures).</p>	<p>DH10(2)II please suggest an alternative policy wording</p>	
<p>Policy DH11, page 63</p>	<p>The policy requires an assessment of proposals outside of designated Archaeological Priority Areas. In comments on the pre-submission version of the plan, the Council suggested that the Forum make contact with the Greater London</p>	<p>The policy requires an assessment of proposals outside of Haringey’s designated Archaeological Priority Areas. In comments on the pre-submission version of the plan, the Council suggested that the</p>	<p>We thought the policy wording had been agreed. However, we are happy to take recommendations and would welcome suggestions for rewording.</p>	<p>It is suggested that reference to the assessment of proposals beyond existing designated Archaeological Priority Areas is removed from the policy because, at this time, they have not been agreed by Historic England and GLASS.</p> <p>Engagement between the Forum and Councils with HE/GLASS on a future review of APAs, in particular the areas of potential interest identified by the Neighbourhood Plan could form a “related non-statutory action”.</p>

	<p>Archaeological Advisory Service (GLAAS) to establish whether there is potential for extending the current designations. It is unclear whether GLASS has been consulted directly, and if any advice was received on this matter.</p> <p>Elements of the approach duplicate Camden Council's adopted policies, but crucially could lead applicants to believe that archaeology needs only be considered late in the planning process. Archaeology, however, must be considered at an early stage in the planning process. Applicants should understand the likelihood of archaeological remains before designs are at an advanced stage. Policy DP25 of Camden's</p>	<p>Forum contact the Greater London Archaeological Advisory Service (GLAAS) to establish whether there is a potential for extending the current designations. It is not clear whether the GLAAS has been consulted directly and if any advice was received on this matter.</p> <p>The policy has been amended since the pre-submission stage to provide that the Council will consult GLAAS on proposals as appropriate. Whilst this is acceptable in principle, the amendment does not address the key issue in respect of the extent of the designated Archaeological Priority Area, as noted above.</p>		<p>Therefore, the following amendments to the policy are suggested:</p> <p>“Within the area of archaeological potential shown on the accompanying map and in the designated Archaeological Priority Areas of Archaeological Value as shown on the Councils' Policies Map, where planning permission has been granted, a condition will be required for, in the first place, development proposals will be required to assess the potential impact on archaeological assets. Where appropriate, a desktop survey for developments which require significant digging down. Such developments would include those laying new foundations or excavating a basement. should be undertaken to assist in the assessment, and Pending the findings, a further field evaluation or trial excavation may be required and if necessary, more complete excavation. Proposals will be expected to provide satisfactory arrangements for excavation and recording, in advance of development. The information thus obtained from the desktop surveys will be published or otherwise made publicly available.”</p> <p>As a consequence, it is suggested Fig. 14 is amended to show only the designated Archaeological Priority Areas.</p> <p>Other areas with potential could be mapped and set directly alongside the relevant non-statutory action.</p>
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	<p>Development Policies states that where there is good reason to believe that there are remains of archaeological importance on a site, the Council will consider directing applicants to supply further details of proposed developments, including the results of archaeological desk-based assessment and field evaluation. The policy should not specify that archaeology issues will be dealt with by condition. There is no need to specify this in the policy, and in some instances a section 106 agreement may be more appropriate, for example if there are off-site issues.</p> <p>It is recommended that reference to the assessment of proposals beyond existing designated Archaeological</p>	<p>As an alternative to extending the designated Priority Areas, the policy could be amended to provide that the Council will apply a watching brief in specified locations or across the Plan area. This will ensure appropriate consideration of archaeological assets on new development proposals.</p> <p>Elements of the approach duplicate Haringey's adopted and emerging policies, but crucially could lead applicants to believe that archaeology need only be considered late in the planning process. Archaeology, however, should be considered at an early stage in the</p>		
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	<p>Priority Areas is removed. Instead, the Plan could indicate that there are further areas of interest where future assessment should be undertaken by the Forum working with Councils, GLAAS and Historic England. This could potentially form a community-led project. For comprehensiveness, the policy should refer to matters which need to be addressed early in the planning process. Reference to the use of conditions should be removed from the policy.</p>	<p>planning process. Applicants should understand the likelihood of archaeological remains before designs are at an advanced stage. The policy should therefore be amended to refer to matters which need to be addressed early in the planning process.</p>		
Key Sites	Haringey response	Forum response	SoCG	
General	<p>All of the Key Sites included in the Neighbourhood Plan are the subject of Site Allocations policies in Haringey's emerging Local Plan (these are signposted for</p>	<p>This is an astounding suggestion at this stage. As Haringey acknowledges, the Key Site Allocations came from the Forum in the first</p>	<p>Haringey's Local Plan site allocation policies will establish the land use principles for strategic sites in Highgate, which are essential to the delivery of Haringey's spatial strategy. It is agreed that the Neighbourhood Plan's Key Site policies will serve an important role in supplementing these allocations with further detailed and localised policy requirements.</p> <p>The Forum believes that the detail in the Neighbourhood Plan <i>would</i> supersede the Local Plan Site Allocations where it is the more recent plan and</p>	

	<p>reference in the comments for each Key Site below). The Site Allocations are considered strategic policies which are essential to the delivery of Haringey's spatial strategy.</p> <p>Haringey's Local Plan examination hearings were carried out from August 23rd to September 8th 2016. The Planning Inspector raised no significant issues in respect of the soundness of the strategic approaches for the Site Allocation policies in Highgate apart from the proposed Highgate Bowl open space designation, discussed in further detail below on KS3. Given the current stage of Local Plan preparation, with the site development principles for the Site Allocations firmly established, the Council considers that</p>	<p>place, as part of our Plan-making process. They are an important part of the Plan and a vital part of our vision for the area. Haringey is sending us a very mixed message: on the one hand they now suggest we should remove the Sites; and, on the other – at meetings with the Borough's senior planners - they have suggested we should be more prescriptive with the development we would like to see. The Planning team advised us that the Neighbourhood Plan was the right place to give a level of detail that was not appropriate for their Local Plan. The Forum understands that the last adopted plan takes primacy in the plan hierarchy, with</p>	<p>provided it is in general conformity with the Local Plan, as will be the case with our site allocations. We would welcome the Examiner's ruling on this.</p> <p>Haringey Council's Site Allocations DPD will only come into effect in mid-2017 and is currently not out of date. While the Council is content that the detail within the Highgate Key Sites can supplement the site requirements already within the Site Allocations, the Council strongly opposes the Key Sites within the Neighbourhood Plan superseding the site allocations in the Site Allocations DPD.</p> <p>The Council notes that the Neighbourhood Plan does not set out a strategic housing requirement for Highgate Neighbourhood Area, and therein, allocate that requirement to sites to deliver (i.e. in accordance with the site allocations).</p> <p>Notwithstanding the above, some amendments are proposed to the detailed Key Site requirements to help ensure consistency with the Site Allocations, as set out below.</p>
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	the corresponding Key Site policies should be removed from the Neighbourhood Plan.	conformity to previous plans agreed as part of that process.	
General	For the most part, the sites in the Neighbourhood Plan are indicated as having been identified in the Call for Sites 2013. This is correct but it is noted that they were identified by the Forum and submitted in the call for sites process.	As above.	Both the Council and the Forum acknowledge the opportunities presented by the strategic sites for delivering sustainable development in Highgate.
General	The Key Site policies commence with the phrase “any allocation, or development on...” - It is not clear what is intended by this wording. The Neighbourhood Plan is setting out site allocations by virtue of the Key Site policies, so the wording is not necessary in this context. It is noted that any higher level plans setting out corresponding site allocation policies, as strategic policies essential to the		For clarity, it is suggested that the phrase ‘any allocation’ is removed from all of the Key Site policies, as follows: Example: KS1 – “Any allocation or redevelopment of land to the north of Archway Road...”

	delivery of the Borough's spatial strategy, will take primacy in the plan hierarchy.		
KS1	<p>This site corresponds with Haringey's emerging policy SA38 (460-70 Archway Road).</p> <p>It is noted that amendments to the draft Plan have been made to clarify the land-use principles for the site, bringing them in line with the emerging Local Plan.</p>		No further comments.
KS2	<p>This site corresponds with Haringey's emerging policy SA40 (Former Highgate Rail Station).</p> <p>KS.II – It should be noted that the Council's Urban Characterisation Study (UCS) 2015 does not set height policies; rather it includes indicative guidelines for appropriate building heights having regard</p>	<p>We were advised to remove references to specific policy numbers from the emerging plans because they are subject to change.</p>	<p>For clarity and accuracy, it is suggested that KS.II is amended as follows:</p> <p>"Any further buildings proposed on site must be modest in scale, respecting the wooded setting of the site and the height policies <u>considerations</u> set out in the 2015 Highgate Urban Character Study".</p>

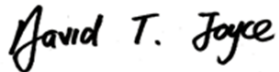
	to local character. Haringey's emerging policy DM6 sets out the Council's approach on building heights, which the Plan could helpfully reference.		
KS3	<p>This site corresponds with Haringey's emerging policy SA42 (Highgate Bowl).</p> <p>Through Haringey's Local Plan examination hearings, the Planning Inspector has advised that several modifications to emerging Policy SA42 are required to ensure it is sound. The Inspector has advised that the open space within the area covered by this allocation is considered Previously Developed Land (PDL), upon which a Significant Local Open Land (SLOL) designation cannot be imposed through the plan-making process. Rather the realisation</p>	<p>The Forum has already talked to Haringey officials about the Inspector's suggested modifications re the Bowl to the Local Plan. We will work with them to modify our Plan to reflect the new wording of their Site Allocation. We request that the Borough keeps us informed and advises us on policy wording. In particular, it has been suggested that we can specifically allocate CIL monies in the Plan and we would welcome advice on how best to word that.</p>	<p>To ensure consistency with the corresponding Site Allocation, Haringey Council suggests that Policy KS3, 1st paragraph is amended as follows:</p> <p>"In the site map, Development offers the opportunity to secure the area the land within the green line, on the site map, as open space. is designated as SLOL (Significant Local Open Land). This policy refers to any allocation or development..."</p> <p>Suggest KSE.II is amended as follows:</p> <p>"Any proposal seeking to deliver new development within the fringe locations of the Bowl must ensure that the open character of the Bowl is maintained under the classification of Significant Local Open Land, assist the Bowl..."</p> <p>Suggest KS.IV is amended as follows:</p> <p>"Any development... must additionally respect the local built form and any identified vistas leading into and out of the Bowl"</p> <p>Suggest KS.V is amended as follows:</p> <p>Any pProposals to develop should demonstrate how they have considered, and where appropriate, will deliver improved access to the centre of <u>and within the Bowl both by foot and bicycle, subject to the operational requirements of existing landowners and/or occupiers.</u></p> <p>The Council has suggested these amendments to bring the policy in line with the Planning Inspector's Main Modifications arising from the examination of the</p>

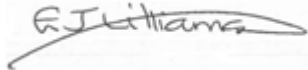
	<p>of the open space designation can only be achieved through designation upon future development of the PDL. The open space area to be secured has been identified by the 'green line' within the Site Allocation (and Key Site). Furthermore, the Inspector has advised that public access into and within any future area designated as open space can only be supported, not required by planning policy, and this will be subject to the operational requirements of existing landowners and/or occupiers.</p> <p>KS3 as currently set out does not reflect the modifications arising from Haringey's Local Plan examination.</p>		<p>Site Allocations DPD.</p> <p>The Haringey Site Allocations Plan is still awaiting final approval by the Inspector and some proposed amendments from the Neighbourhood Forum and associated Highgate voluntary associations have been proposed to the SA42 Highgate Bowl section. The Forum expects that the Highgate Neighbourhood Plan will take account of any of these amendments which are made in the finally approved document, and reflect the proposals in its objectives for the Highgate Bowl (KS3).</p>
KS4	<p>This site corresponds with Haringey's emerging policy SA43 (Summersby Road).</p>	<p>KS4.1 - The Forum has previously been advised to word the policy in this way.</p>	<p>For effectiveness, it is suggested that KS4.1 is amended as follows: "The development contributes towards all types of meeting local housing need, in line with policies elsewhere in this Plan (see SC1)"</p>

	<p>KS4.I – It is unrealistic to suggest that one site can make a contribution to addressing all types of local housing need.</p> <p>KS4.IV – It should be noted that the Council’s Urban Characterisation Study (UCS) 2015 does not set height policies; rather it includes indicative guidelines for appropriate building heights having regard to local character. Haringey’s emerging policy DM6 sets out the Council’s approach on building heights, which the NP plan could helpfully reference. To ensure conformity with Haringey’s emerging local plan, the policy could be amended to provide that proposals adopt appropriate heights “having regard to” the 2015 UCS (rather than in</p>	<p>However, we agree to remove the phrase “all types of”.</p> <p>KS4.IV - The Forum does not agree – we are unsure what benefit the suggested change in policy wording would confer. Again, we have been advised not to reference a specific Borough emerging policy.</p>	<p>For clarity, it is suggested that KS4.IV, 3rd sentence, is amended as follows:</p> <p>“New development should make use of the relief/topography of the land and adopt appropriate heights in accordance with <u>having regard to</u> the 2015 Urban Character Study to ensure that the built form is not overbearing in nature”.</p>
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	accordance with).		
KS5	<p>This site corresponds with Haringey's emerging policy SA39 (Gonnermann Antiques Site and Goldsmith's Court).</p> <p>KS5 – The requirement specifying unit sizes and development typology ("small flats") would need to be supported by evidence.</p> <p>KS5.1 – 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. Furthermore, the policy is not in conformity with Haringey Policy SP2 which seeks affordable housing re-provision on a habitable room basis.</p>	<p>This policy has been developed in very close collaboration between the Forum, Haringey officers and current residents at Goldsmith's Court. We are reluctant to change any wording of this policy as it reflects exactly what the Forum and residents expect to see on the site and we have been careful to incorporate any suggestions from the Borough. We believe we have provided sufficient evidence to support this policy as it stands and, moreover, are surprised to have these suggestions from the Borough at this stage.</p>	<p>The Council and the Forum agree on the strategic land use principles for the site. However, the Council considers that several of the detailed site requirements are not in general conformity with the strategic planning policy framework. This includes the requirement specifying units sizes and development typology (small flats), along with Criteria I and IV, as set out in its Submission Consultation response. The Forum considers these requirements are appropriate in their current format.</p>

	<p>KS5.IV – It is not considered appropriate to require that a greater quantum of open space is re-provided where there is a degradation or loss of open space. Haringey’s policies protect against the net loss of open space, but allow for reconfiguration where this improves quality of and/or accessibility to open space.</p>		
<p>Strategic Environmental Assessment (SEA)</p>			<p>Camden Council confirms that the SEA has been prepared in accordance with the relevant legislation and regulations.</p>

Signed on behalf of Camden Borough Council		
Name & Position	Signature	Date
David Joyce Director of Regeneration & Planning		19 th January 2017

Signed on behalf of Haringey Borough Council		
Name & Position	Signature	Date
Emma Williamson Assistant Director for Planning		19 th January 2017

Signed on behalf of Highgate Neighbourhood Forum		
Name & Position	Signature	Date
Maggy Meade-King Chair, Highgate Neighbourhood Forum	M.Meade-King	18 January 2017