

**Camden Council - Representation on Highgate Neighbourhood Plan  
Submission Draft (Regulation 16), October 2016**

These comments form Camden Council's representation on the submission draft of the Plan and include input from all relevant council departments. The representation is intended to address the Neighbourhood Plan's consistency with national policy and conformity with the strategic policies of the Council's adopted and emerging Local Plans as well as the potential effectiveness of the policies for the purposes of assessing planning applications.

The Council has previously provided comments to the Neighbourhood Forum on a number of working draft plans, including two versions of the pre-submission plan (Regulation 14). In particular, we have provided advice on our adopted and emerging planning policies and guidance.

The Council has set out recommendations on how the wording of policies could be further refined to ensure they can be applied effectively in the assessment of planning applications. We have also indicated some cases where the draft policy may prevent positive opportunities for achieving sustainable development from being realised.

Haringey Council has made its own representation on the Plan. Camden's representation has been shared with Officers at Haringey who generally support its content. Where Haringey Council is raising separate or additional concerns, this is owing to differences taken by the Boroughs in their adopted/emerging Local Plans. Each Council has different strategic approaches in certain policy areas (and particularly on transport and parking) which reflect the unique circumstances of their areas.

Section	Comment
General	<p>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.</p> <p><b>It is recommended that paragraph numbering is added throughout the document.</b></p>
Sub-objective SO5.1, page 17 and Core Objective 5, page 54	<p>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 draft which requires "preserves, or where possible, enhances".</p> <p><b>It is recommended that this sub-objective is reworded to avoid conflict with the 1990 Act.</b></p>

Policy SC1, Criterion I, Page 21	<p>While the Council’s preference is for affordable housing to be delivered ‘on-site’, it does not apply a specific target for developments.</p> <p><b>It is recommended that reference to council “targets” for on-site provision is removed for accuracy.</b></p>
SC1, criterion II, page 21	<p>“Efficient use of land and buildings...” It is unclear how this should be applied.</p> <p><b>It is recommended that the supporting text provides further explanation of the term “efficient”.</b></p>
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><b>It is recommended that the meaning of “starter homes” in this policy is clarified.</b></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 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><b>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.</b></p>
Page 22	<p>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.</p> <p><b>It is recommended that the reference to a ‘starter homes’ target in the London Plan is deleted for accuracy.</b></p>
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><b>It is recommended that the words “all new” are deleted to more closely reflect the nature of schemes likely to contribute towards community facilities.</b></p>

Policy SC2	<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.</p> <p><b>It is recommended that the phrase “wherever possible” is deleted from the policy for the sake of 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.</b></p>
Policy EA1, Criterion I, page 28	<p>“As a general guideline” – this introduces uncertainty regarding how the policy should be applied.</p> <p><b>It is recommended that the text “As a general guideline” is deleted.</b></p>
Policy EA1, Criterion III, page 28	<p>Camden’s town centres policies (CS7 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.</p> <p>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.</p> <p>The policy should make reference to both ‘vitality’ and ‘viability’ to bring into line with higher level policies.</p> <p><b>It is recommended that the wording “is assessed for its potential impact” is replaced with “does not result in an unacceptable impact.”</b></p>
Policy TR1, page 37	<p>“Commercial, service-based and large residential development should make suitable provision...”</p> <p>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 an site area of at least 1 hectare.</p> <p><b>It is recommended that the policy refers to major development – for both commercial and residential schemes for clarity.</b></p>
Policy TR1, page 37	<p>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.</p> <p><b>It is recommended that the text “in a way that they have not done in the past” is deleted as it is potentially misleading.</b></p>

Policy TR2, page 38	<p>For clarity, it is recommended that the title is amended to read 'Movement of Heavy Goods Vehicles'.</p> <p><b>It is recommended that the title is amended as suggested above.</b></p>
Policy TR2, page 38	<p>Use of Construction Management Plans – the policy needs to clarify how “significant development” will be assessed.</p> <p>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><b>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 Neighbourhood Plan and improve clarity.</b></p>
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.</p> <p>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><b>It is recommended that the text is amended to clarify how the Council secures management plans within the supporting text.</b></p>
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><b>It is recommended that the policy refers to ‘major’ development rather than “significant” for effectiveness.</b></p>
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><b>It is recommended that the policy provides information on the circumstances in which parking surveys will be sought.</b></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 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). 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 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><b>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 to introduce through its emerging Local Plan. This could be included as part of the supporting text for applicants.</b></p>
<p>Policy TR4, criterion VII and VIII, page 40</p>	<p>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.</p> <p><b>It is recommended that minor redrafting occurs for the sake of clarity and effectiveness in applying the policy.</b></p>
<p>Policy TR4, criterion VIII, page 40</p>	<p>“Surface run-off” should say surface <u>water</u> run-off.</p> <p><b>It is recommended that the word ‘water’ is added for clarity.</b></p>

<p>Policy TR5, criterion I, page 42</p>	<p>The principal concern for the Council is that 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><b>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.</b></p>
<p>Open space P.46</p>	<p>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.</p> <p><b>It is recommended that the text “to include, but not limited to” is removed to clarify which areas are “major open space”.</b></p>
<p>Policy OS1, page 46</p>	<p>“Any new” in the first sentence of the policy is superfluous. For the sake of clarity it should be removed.</p> <p><b>It is recommended that the first sentence refers to “Development”.</b></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 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 and watering affecting survival rates. Visual impact should not be the only consideration taken into account.</p> <p><b>It is recommended that the policy introduces greater flexibility relating to replacement tree planting.</b></p>

<p>Policy OS2, criterion III, page 47</p>	<p>Where a tree is 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.</p> <p>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).</p> <p><b>It is recommended that mitigation for tree pruning is removed as this is not likely to be an enforceable or reasonable approach and may be counter-productive to encouraging active tree management by landowners and developers.</b></p>
<p>Policy OS2, page 47</p>	<p>“Developers and others”, replace with “new development” for the sake of clarity and to reflect commonly used terminology.</p> <p><b>It is recommended that the above change is made to the wording of this policy.</b></p>
<p>Policy OS4, page 51</p>	<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><b>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 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.</b></p>
<p>Policy OS4, page 51</p>	<p>1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence – addresses detailed points about ecological surveys which should be set in the supporting text to the policy.</p> <p><b>It is recommended that the above change is made to the wording of the policy for the sake of clarity.</b></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 Camden) and the Highgate Conservation Area (LB Haringey).</p> <p><b>It is recommended that the map re-labels the above mentioned conservation areas for the sake of clarity.</b></p>
<p>Policy DH2, Page 55</p>	<p>The policy should refer to character <u>and</u> appearance, rather than character or appearance as both are relevant in this context.</p> <p><b>It is recommended that “or” is replaced with ‘and’ to ensure the policy is effective.</b></p>

<p>Policy DH5, Page 57</p>	<p>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 should...”</p> <p><b>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.</b></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 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><b>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.</b></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 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><b>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.</b></p>



Policy DH7,  
page 58

The proposed policy duplicates Camden 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 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 risk-based 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".

#### Construction Management Plan (CMP)

The Council secures construction management plans through a Section 106 agreement and not by 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.

#### 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><b>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 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.</b></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.</p> <p><b>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.</b></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 provided evidence to justify this more restrictive approach.</p> <p>Criterion 2. – suggest removing the first word ‘other’ as it is assumed these conditions apply to all backland development.</p> <p><b>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.</b></p>

Policy  
DH11, page  
63

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 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.

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 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.

**It is recommended that reference to the assessment of proposals beyond existing designated Archaeological 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.**

**Haringey Council response to  
Highgate Neighbourhood Plan Submission  
(Regulation 16) Consultation**

**October 2016**

1. The following is Haringey Council's response to the Highgate Neighbourhood Plan, submitted to Haringey and Camden Councils pursuant to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The comments are made having regard to ensuring the Plan: is in conformity with national policy and the strategic policies of the Council's adopted and emerging Local Plan; provides additional local policies which are robustly evidenced; and is judged to provide a sound basis, for use by the Councils, in planning decisions and coordinating area investment.
2. The Council has previously provided comments to the Neighbourhood Forum on a number of working draft and consultation plans, including submission of joint-comments with Camden Council on two versions of the pre-submission (Regulation 14) Neighbourhood Plan.

**Section 1 - General Comments**

3. Haringey Council commends the Highgate Neighbourhood Forum for its work in progressing with the Neighbourhood Plan to the submission stage. It is acknowledged that the Forum has amended earlier draft versions of the Plan taking account of the Council's comments, public consultation feedback and the NPIERS plan review service.
4. It is noted that the Forum has submitted a Basic Conditions statement in line with the statutory requirements. However, the Council considers that there are policies within the Plan which are not consistent with national policy or in conformity with the strategic policies of Haringey's adopted and emerging Local Plan. These have been signposted in the detailed comments below.
5. 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.
6. 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", 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.

7. 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 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.
8. 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 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.
9. 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.
10. 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).
11. For the most part 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 policy is necessary and the evidence to support this assertion.
12. As the Forum is aware, Haringey Council’s emerging Local Plan – including the Site Allocations document – is currently undergoing Examination in Public, with hearing sessions on the four documents having taken place August 23<sup>rd</sup> – September 8<sup>th</sup> 2016. A schedule of the Inspector’s Main Modifications is due to be published for statutory consultation in November 2016.

## Section 2 – Detailed policy comments

Ref	Topic	Comments
Intro	Introduction	<p>Paragraph 1.4.2 – It is not clear what is meant by “logistical challenges” and this should be further clarified.</p> <p>Paragraph 1.4.7 (1<sup>st</sup> paragraph) – The Council notes the Plan seeks to influence the quantity of development within Highgate. This must be set in context of NPPF paragraph 16 where the Neighbourhood Plan should support strategic development needs within the Local Plan as well as to support development outside of those strategic elements.</p> <p>Paragraph 1.4.8 (4<sup>th</sup> paragraph) – regarding “cohesion between borough policies”; see General Comments paragraph 8 above.</p>
SC1	Highgate’s housing needs	<p>SC1 (1<sup>st</sup> 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.</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>SC1.II – The phrase “efficient use of land” should be clarified as it is not clear how this would be applied. To ensure consistency with higher level policies, it is recommended that the policy refers to “optimising” the use of land in this context.</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>SC1.IV – In prioritising self-build and custom-build housing, the Plan should demonstrate evidence of local need and identify sites where such need can be met – 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>Supporting text (4<sup>th</sup> 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</p>

		<p>not fully in conformity with London Plan Policy 3.14 which states that loss of housing should be resisted unless replaced at existing or higher densities with at least equivalent floorspace.</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 implemented in this context.</p>
N/A	Community facilities / CIL	<p>Page 23 (3<sup>rd</sup> 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> <p>Page 23 (3<sup>rd</sup> 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 (3<sup>rd</sup> 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>Whilst recognising that the Forum is seeking to ensure that the Neighbourhood Area is appropriately supported by community infrastructure, it is noted that planning can only intervene to facilitate delivery of such infrastructure through new development.</p>
SC2	Allotments and communal garden land	<p>SC2.II – To ensure effective implementation the policy should specify the locations where this new provision is required to meet identified need.</p> <p>SC2.II - Whilst recognising the wording sets out the requirement is to be applied “wherever possible”, there are concerns that the policy could adversely impact on development viability. It is therefore recommended that this criterion is amended to read “wherever possible and viable”.</p>
EA	Employment requirements	<p>Paragraph 3.2.1 (3<sup>rd</sup> 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 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>

EA1	Highgate Village Core	<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>EA1.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 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>
EA2	Archway Road	The policy should be justified through the inclusion of supporting text.
EA3	Aylmer Parade	<p>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.</p> <p>Loss of B1 – The loss of employment floorspace is 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 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	For effectiveness, it is recommended that the policies in this section refer to “major” development rather than “significant”.
TR1	Promoting sustainable movement	TR1.III and TR1. IV – These requirements are considered too onerous - unless directly related to development, they would not meet the key tests for planning contributions set out in NPPF paragraph 206.
TR2	Movement of heavy goods	<p>For clarity, it is recommended that the title be amended to read “Movement of Heavy Goods Vehicles”.</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</p>



		<p>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 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 (3<sup>rd</sup> sentence) – These are detailed requirements for CMPs and Delivery and Servicing Plan conditions that would be more appropriately set in the supporting text.</p> <p>TR2.II and III – It is recommended that these considerations are consolidated into a single criterion requiring “adequate servicing arrangements from the construction to end-user phase of development”.</p> <p>TR2.IV – Some of these requirements are outside the scope of neighbourhood planning policy (i.e. pertaining to the development and use of land). In addition, it is not clear how they could be implemented having regard to the key tests for planning obligations set out in NPPF paragraph 206.</p>
TR3	Minimising the impact of traffic arising from new development	<p>It is not considered appropriate that all qualifying proposals (i.e. major development and other proposals likely to have significant transport impacts) provide 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>Appendix 2 (Forum website) sets out key issues, challenges and 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>The policy should be justified with additional supporting text.</p>
TR4	Reducing the negative impact of parking in Highgate	<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</p>

		<p>between local planning authority 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. The Council does not support the Plan’s approach for car-free development, as currently worded.</p> <p>TR4.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.</p> <p>TR4.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 local character, which could include the historic environment and heritage assets (where reference to the impact on setting would be more appropriate).</p> <p>TR4.VII – 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.</p> <p>TR4.VIII – Reference to surface “water” run-off should be made for clarity.</p> <p>Supporting text (3<sup>rd</sup> paragraph) – the Plan does not specify what comprises these “exceptional circumstances”. Whilst Haringey supports car-free and car-capped development, where appropriate, it does not consider that this should be a requirement for all new development proposals.</p> <p>Reference to Haringey’s policy DM 43 should be amended to read DM 32.</p>
TR5	Dropped kerbs and crossovers	<p>The term “area of high parking stress” 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>
OS1	Vistas from and to major open	<p>The Council considers that OS1 is too onerous and not consistent with the NPPF requirement to plan positively. This is</p>

	spaces	<p>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 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>
OS2	Protection of trees and mature vegetation	<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 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.I – The requirement for “like for like” replacement of trees is not considered appropriate or feasible.</p> <p>OS2.II (1<sup>st</sup> 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.</p> <p>OS2.III – Management of 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>
OS3	Local Green Space	<p>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 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</p>

		<p>from August 23<sup>rd</sup> to September 8<sup>th</sup> 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 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 protect through the Local Plan, should be considered having regard to NPPG.</p>
OS4	Biodiversity and ecological corridors	<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>OS4 (1<sup>st</sup> 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>OS4 (1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence) – These are detailed requirements for ecological surveys that would be more appropriately set in the supporting text.</p>
DH2	Development proposals in Highgate’s conservation areas	Suggest amending “character or appearance” to “character and appearance”.
DH3	Rear extensions	The policy should include a qualifier recognising that not all rear extensions will require planning permission (i.e. some development will fall within permitted development).
DH4	Side extensions	The policy should include a qualifier recognising that not all side extensions will require planning permission (i.e. some development will fall within permitted development).
DH5	Roofs and roofscape	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.

		It is suggested that 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.
DH6	Front boundaries	DH6 (1 <sup>st</sup> 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.
DH7	Basements	<p>It is acknowledged that this policy has 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 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. The matter of working hours cannot form part of planning policy as it is covered by other legislation.</p>
DH8	Refuse storage	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").
DH10	Garden land and backland development	<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 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>
DH11	Archaeology	The policy requires an assessment of proposals outside of

		<p>Haringey's designated Archaeological Priority Areas. In comments on the pre-submission version of the plan, the Council suggested that the 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>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 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>
KS	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 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 23<sup>rd</sup> to September 8<sup>th</sup> 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 the corresponding Key Site policies should be removed from the Neighbourhood Plan.</p> <p>Notwithstanding the above, we have provided further detailed comments on the Key Site policies below.</p>
KS	General	<p>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.</p>

KS	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 delivery of the Borough’s spatial strategy, will take primacy in the plan hierarchy.
KS1	460-70 Archway Road	This site corresponds with Haringey’s emerging policy SA38 (460-70 Archway Road).  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.
KS2	Former Highgate Station and Surrounds	This site corresponds with Haringey’s emerging policy SA40 (Former Highgate Rail Station).  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 to local character. Haringey’s emerging policy DM6 sets out the Council’s approach on building heights, which the Plan could helpfully reference.
KS3	Highgate Bowl	This site corresponds with Haringey’s emerging policy SA42 (Highgate Bowl).  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 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.  KS3 as currently set out does not reflect the modifications arising from Haringey’s Local Plan examination.
KS4	Muswell Hill Road	This site corresponds with Haringey’s emerging policy SA43 (Summersby Road).  KS4.I – It is unrealistic to suggest that one site can make a contribution to addressing all types of local housing need.  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 accordance with).
KS5	Gonnermann Site and Goldsmiths Court	<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.I – Is there sufficient evidence to justify the policy prescribing that “at least 16 affordable units” are required? Provision should be negotiated at the design and application stage, having regard to Haringey’s strategic housing policies. Furthermore, the policy is not in conformity with Haringey Policy SP2 which seeks affordable housing re-provision on a habitable room basis.</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>

### Section 3 – Strategic Environmental Assessment / Sustainability Appraisal comments

13. It is noted that an update to the SEA/SA has been undertaken to take account of changes to the Pre-Submission document which are now reflected in the Submission version of the Neighbourhood Plan. Haringey Council is satisfied that the relevant statutory requirements have been satisfied in this regard.
  
14. The Council has four emerging Local Plan documents which are currently undergoing Examination in Public, pursuant to Regulation 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Three of Haringey’s emerging Local Plans are relevant to the Highgate Neighbourhood Area (Alterations to Strategic Policies, Development Management and Site Allocations). Sustainability Appraisal and Habitats Regulations Assessments have been carried out on these plans, in line with the statutory requirements.
  
15. With the Forum preparing Neighbourhood Plan policies for which there are corresponding emerging Local Plan policies (i.e. Key Site / Site Allocation policies) the Council considers it would be helpful to comment on the different outcomes demonstrated through the Sustainability Appraisal process, along with other general comments on the narrative within the Forum’s submitted draft Final SEA/SA Report. The following comments (paragraphs 16-19) however do not prejudice the Council’s overarching statement set out in paragraph 13 above.



16. Paragraph 5.1.6 - “The policy approach to addressing other issues is relatively non-contentious at this stage in the plan process, with the emerging preferred approach having already been adjusted and refined to reflect the views of the two Councils and stakeholder organisations.” Whilst it is recognised that the Forum has revised the draft Plan taking account of consultation feedback from the Councils, Haringey notes that the submission version of the Plan reflects that not all of our comments/suggestions have been taken on board. Haringey considers there are further opportunities to amend the Plan to bring it in line with the NPPF and Haringey’s adopted/emerging Local Plans.
17. Paragraph 5.1.7 - “With regards to site-specific policy, there is very little variation between what is being proposed through the emerging Neighbourhood Plan and what is being proposed through the Haringey’s emerging Site Allocations Plan, hence it was deemed unnecessary to appraise alternatives for any site”. Whilst Haringey generally accepts that the broad principles for future development on the Key Sites align with the emerging Local Plan site allocations (notwithstanding Hillcrest) it considers there are notable variations in the detailed site requirements between the Plans, and we have made comments above in respect of conformity with our emerging strategic policies.
18. Paragraph 7.2.1 – We note that the report signposts that in response to the Forum’s January 2015 consultation, the Council identified that proposals seeking to protect open land at Hillcrest Housing Estate were not in conformity with Haringey’s emerging site allocation; and that the Forum has still considered it helpful to assess implications of designating the open land at Hillcrest as Local Green Space.
19. Section 7 and Appendix V - (Appraisal of open space and public realm alternatives) – The appraisal scores option 1 (green space designation) comparatively better than option 2 (do not designate / Haringey draft Site Allocation), against the assessment objectives. Haringey notes that the sustainability appraisal framework against which the Neighbourhood Plan is appraised is specific to and set in the context of the neighbourhood area and the NP plan objectives. Haringey’s Site Allocations Local Plan and corresponding sustainability framework are set having regard to delivering sustainable development at a broader Borough-wide basis. Haringey’s emerging Site Allocations DPD has been subject to Sustainability Appraisal, with SA report for the Pre-submission version of the Plan having concluded that significant positive effects are predicted across the majority of sustainability topics, with no instances of significant negative effects predicted. Haringey also notes the findings of the appraisal which indicate that designation of the open land at Hillcrest as Local Green Space might act to preclude future residential development on parts of the site.

**Vickers, Ben**

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**From:** [REDACTED]  
**Sent:** 04 November 2016 12:13  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Forum

Dear Sir or Madam,

I am writing to support the above plan. I am involved in the voluntary sector and would very much like volunteering to be an important part of community life in both Camden and Islington.

Thank you for your work and support with the Plan,

Yours faithfully,  
Angela

## Vickers, Ben

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**From:** Claire McLean <Claire.McLean@canalrivertrust.org.uk>  
**Sent:** 06 October 2016 08:45  
**To:** LDF  
**Subject:** RE: Neighbourhood Planning in Highgate

Dear Local plan team,

Thank you for this recent consultation. I can confirm that the Canal & River Trust do not own any land or waterspace within the Highgate area, so have no comments to make.

Kind regards,

Claire McLean | Area Planner | London

Canal & River Trust | The Toll House | Little Venice | Delamere Terrace | London | W2 6ND

T: 0203 204 4409 | M: 07917616832

### Living waterways transform places and enrich lives

Please note, I do not work on Fridays

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**From:** Oruwari Mercy [mailto:Mercy.Oruwari@haringey.gov.uk]  
**Sent:** 23 September 2016 13:21  
**Subject:** Neighbourhood Planning in Highgate

Dear  
Consultee,

### **PLEASE SEE EMAIL WITH ATTACHMENT**

The Highgate Neighbourhood Forum has submitted their proposed Highgate Neighbourhood Plan to the London Boroughs of Camden and Haringey, in line with the Neighbourhood Planning Regulations (General) 2012. The Councils are now seeking views and comments from residents and interested stakeholders on the proposed plan. The consultation will run from **23<sup>rd</sup> September until 4<sup>th</sup> November 2016**.

The Plan sets out a range of planning policies on matters including design, open space, retail and transport which will apply to the designated Highgate Neighbourhood Area. If adopted, the Highgate Neighbourhood Plan will be a statutory planning document and will form part of Haringey and Camden's development plans.

To view the proposed Plan, the map of the area and all related documents please go to [www.haringey.gov.uk/neighbourhood-planning](http://www.haringey.gov.uk/neighbourhood-planning) or [www.camden.gov.uk/neighbourhoodplanning](http://www.camden.gov.uk/neighbourhoodplanning);

Hard copies are also available to view at the following locations:

- Highgate Library, Shepherds Hill, Highgate, N6 5QT
- Wood Green, High Road, Wood Green N22 6XD
- Haringey Civic Centre, Wood Green High Rd, N22 8LE
- Level 6 River Park House, Wood Green, N22 8HQ

Representations can be made via:

- email to Haringey at [localplan@haringey.gov.uk](mailto:localplan@haringey.gov.uk)
- post to Planning Policy Team, Level 6, River Park House, Wood Green, N22 8HQ

If you would like to speak directly to a Council Officer about the Plan, we will be running two drop in sessions in **Highgate Library, Shepherds Hill, Highgate, N6 5QT** on:

- Tuesday 4<sup>th</sup> October 12 – 2pm and 5 – 7pm; and
- Tuesday 11<sup>th</sup> October 12 – 2pm; and 5 – 7pm

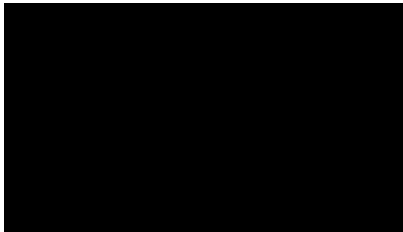
Please find attached a ‘**Statement of Representation Procedures**’ for further details on the consultation, guidance on making comments to the Plan, and the next steps in the Plan making process.

For further information specific to Camden please go to [www.camden.gov.uk/neighbourhoodplanning](http://www.camden.gov.uk/neighbourhoodplanning)

For further information on the Highgate Neighbourhood Forum please go to [www.highgateneighbourhoodforum.org.uk/plan/](http://www.highgateneighbourhoodforum.org.uk/plan/)

**Comments must be received by 4th November 2016.**

Kind Regards,




Haringey Council  
River Park House, 225 High Road Wood Green, London, N22 8HQ

T. 020 8489 5318  
E. [clodagh.mcguirk@haringey.gov.uk](mailto:clodagh.mcguirk@haringey.gov.uk)

Please note I work Monday - Wednesday only.

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 Please consider the environment before printing this email.

Regards,

**Mercy Oruwari**  
Assistant Planner  
Planning Policy and Development  
6th Floor River Park House  
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## Vickers, Ben

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**From:** Cristiane Richardson <[REDACTED]>  
**Sent:** [REDACTED]  
[REDACTED]  
[REDACTED] comments on the Wellington Roundabout and adjacent roads

Hi Simon - apologies for the small delay in getting back to you.

Thank you for your enquiries. It is a disappointment to hear you say "I don't think there is any mechanism or desire to remove the businesses from the island." - if this is indeed the case what is the point of your enquiry, the Neighbourhood Forum, Neighbourhood Plan, Localism Act and so forth?

Yes, I have lived on the 'island' / Wellington Roundabout since 2000. Unfortunately our household was not consulted in the community survey which claims to have been delivered to all 8000 households in Highgate, or at any other stage, with regard to the Highgate Neighbourhood Plan.

From your questions I suspect you have never walked around the 'island' yourself? The pedestrian access is extremely difficult. One example: no one standing to cross on the corner of Bakers Lane and North Hill/Archway Road feels safe. As Leader for Traffic and Transport for the Forum you ought to try it for yourself during rush hour, pretending you are elderly / disabled / with a pram or young child. I shiver with fear just to think about it as I have seen a huge amount of irresponsible driving around the Wellington in 17 years.

As you asked, in an ideal world:

1-) the gyratory should be removed/completely re-designed to provide the much needed safety to residents and visitors, and to avoid a fatal accident. I'm no traffic design engineer expert so I can't suggest how to effectively achieve this. I've seen a few cars get crushed by lorries when going north round the Bakers Lane corner, as some drivers think they can squeeze in on the inside lane when in reality it is not possible. I don't think that the random and uninformed suggestion to put a bus terminal on the lay-bys by Esso garage should ever be permitted to become reality - there are enough serious accidents with buses as it is (more on this below)!!

2-) the Esso garage issue will not be resolved by "having the petrol station as enter only on Archway Road and leave only on North Hill" as you suggest - all entrances cause traffic flow issues on this major route! The Wellington roundabout is definitely not suitable for this type of business where long queues spill out to North Hill and Archway Road, cars come in and out from 4 access entrances/exits not seeing or heeding any of the signs, and with many drivers using the Esso garage as a 'shortcut' between North Hill and Archway Road and vice-versa.

The two lay-by's outside the Esso garage are often used as a stolen / abandoned car dumping ground, I have lost count how many times we have had to report vehicles, and at one point there was a family living in a car parked on lay by for several months despite several residents reporting it to the council! In an ideal world, there would be residents' parking permit restrictions on these 2 lay-bys, in the hope that with permits/restrictions the spaces would be enforced regularly, as opposed to never being checked.

3-) the American Car Wash is truly a neighbour from hell...we and our neighbours have had to call Environmental Health officers dozens of times, who eventually:

a) have served the car wash with a 'Light Pollution Abatement Notice' in 2012 (they still have powerful

spotlights around their yard, some still visible from our houses),

b) have also issued them with a warning in 2013 not to use their car drying machines - the council sent in an acoustics expert from Marshall Day to assess the noise levels, who simply picked one frequency - the car dryers - as the culprit even though the decibel noise was/is still over the limit without the dryer noise.

However:

- the excessive noise persists with hoovers, jet washers, loud outdoor telephone bell, shouting, etc - see below,
- they have an outdoors telephone which we can hear ringing from inside our house - the phone rings out of business hours too,
- there is shouting all day long - it's so noisy staff can't just talk to each other they have to shout, in the last month we have had to cope with staff singing and whistling 'Jingle Bells' for hours on end,
- in the winter they often leave previously mentioned spot lights on as they forget to switch it off when they close for the day,
- we get car wash spray (dirt / detergent) on our garden which we cannot use thanks to the car wash being open 7 days a week, from 8:30am to 6:30pm officially but often they open earlier and close later,
- they burn things in the yard - I have sent video footage of the smoke billowing over the fence to the council but never heard back and if we have any windows open, the toxic smell fills the up house,
- they produce visual pollution with their excessive advertising - all their walls have advertising panels/banners/signs, even the ones facing our houses; there are one or two human sized waving dolls on the pavement which have been blown onto road by the wind; there are multiple advertising tyre stacks along Archway Road which are left on the pavement 24/7 - it is all too much,
- they have allowed people to live in the office above car wash - we could hear their alarm system being switched on and off several times outside opening hours - which my neighbour reported at the time as whomever was living there also had a banned breed of dog which was abandoned at weekends whilst the poor dog barked for hours on end.

The American Car Wash arrived on the 'island' in 2011, and according to Haringey Planning Officer the site is owned by Haringey Council and is licensed for 'Car Garage' use, which apparently includes a car wash business as well as car mechanics, tyre center, etc. However, the car wash that existed before 2011 was a HAND car wash - there were no jet washers, dryers, industrial hoovers, etc. PLUS they opened 6 days a week so at least we could have ONE day a week to socialise with friends in our garden - something we haven't been able to do since 2011... who wants their barbecue sprayed with car wash detergent/dirt mist whilst having people shouting and whistling and whooping at the top of their voices over the industrial noise? I frankly don't understand how/why Haringey Council lets the American Car Wash get away with being such disrespectful and inconsiderate neighbours. It is not the case that the American Car Wash is an essential / vital / forward-looking / entrepreneurial / sustainable / attractive business for the area, plus there is a car wash right next door at the Esso garage already...

So when I said we feel like the forgotten residents of Highgate, I really mean it. It really feels like we live in an industrial estate, not a Conservation Area or 'a place of special character'. I have personally spent years logging complaints, gathering 'evidence' as instructed, basically doing someone else's work and nothing gets resolved. How many years of hanging around waiting for Environmental Health to turn up are needed for someone at the Council to do something about it? It feels like the council does not have a real interest in actually protecting the environmental wellbeing of the area or its residents.

If anyone were to ask the other 'island' residents' opinions on the 'island', I believe similar concerns on these issues will be expressed. More widely and precisely, perhaps ask the family who live on North Hill opposite the houses on the island, who had a bus crash through their front garden wall, they should have something to say. They have just finished building their new wall. As I said before, there was also a total loss of 3 cars due to another bus losing control and crushing the 3 cars, ours included, parked on the first

lay-by outside Esso garage. Fortunately no one was in the vehicles at the time but we, our neighbours or others could easily have been. It really is a miracle no one has been killed yet!!

I honestly hope that between the Council who licenses and allows these unsuitable business to carry on trading on this treacherous roundabout, TfL who despite claims on their website are not providing the much needed and overdue road safety - see also TfL's track record on their inability to provide safety on 'Suicide' Bridge on Hornsey Lane and other Highgate accident hotspots, and the Highgate Neighbourhood Forum - who I hope will use the powers given by The Localism Act to indeed safeguard the well-being of residents in the area, you can come up with an adequate solution to all the Wellington roundabout issues that I have, once again, taken time to point out. This is one of the main 'entrances' to Highgate and as it stands it offers a very dangerous, and potentially lethal entry to Highgate as briefly mentioned in the Highgate Neighbourhood Plan Appendix 2. I find it hard to believe that both the Council and TfL are unaware of these issues, and feel disappointed and let down by their unwillingness to investigate fully to prevent a potential fatality. All that appears to have been done - especially on Bakers Lane corner heading north - is the change of the bollards on pavement corners as every few years as the old ones get destroyed by large lorries cutting the corner. It still seems unsafe on that corner - especially when attempting to cross the road as a pedestrian.

Yours sincerely,  
Cristiane

On 4 Oct 2016, at 21:42, Simon Briscoe [REDACTED]

Hello and thanks for getting in touch.

I am happy to pick this up at some point but can you just say what you'd like to happen in the ideal world? I don't think there is any mechanism or desire to remove the businesses from the island. Do you want the gyratory/roundabout design removed/changed? Would having the petrol station as enter only on Archway Road and leave only on North Hill work?

And do you live on the island?

Best wishes, Simon

[REDACTED]

Hi Maggie,

Thank you very much for getting back to me.

We were never consulted unfortunately. It would be interesting to know how many residents around the Wellington were consulted because I believe no one wants cars driving the wrong way, everyday, on a major route.

Also if in the future there is any rethink in and around the Wellington roundabout can you / council / TFL make sure the we, ALL the residents that live ON the Wellington roundabout are actually consulted please?

Is there any way you can put this forward please? I am unable to start a local campaign or consult with neighbours.



I feel this is up to the Council / TFL to address the safety of the public in the borough, not the residents.

Councillor Bob Hare said:

"It may be that a sign facing this exit from the garage would be all that is needed to remind drivers that this is a one-way section of road, and they must turn right."

However, there is a sign there already...

Please review video footage again, as I say, it is just a matter of time before there is a fatal collision.

Many thanks and all the best,  
Cristiane

On 4 Oct 2016, at 10:29, Maggy Meade-King

[REDACTED]

Hi Cristiane - thanks for sending us this - I will pass it on to Simon Briscoe who leads on traffic and transport for the Forum.

In fact, the residents around the Wellington were consulted when we first began the neighbourhood planning process in 2013 but we were informed that they wanted to leave things as they were, so we concentrated our efforts on Aylmer Parade. In any case, neighbourhood forums don't have much influence on transport matters (neighbourhood plans have to address land use planning) and the A1 is under the control of TfL.

Having said that, I think that what is now happening at the Archway Roundabout indicates that TfL is rethinking it's attitudes to gyratories and might well be open to representations from local residents. I would suggest that you and your neighbours get together to come up with a vision for what you would like to see there and then the Forum can help you meet TfL to discuss it with them.

all the best

Maggy Meade-King

Chair, Highgate Neighbourhood Forum

[REDACTED]

On 29 Sep 2016, at 09:43, Cristiane Richardson

<[REDACTED]>

**Name:** Cristiane Richardson

**Email:** [REDACTED]

This happens at the Wellington Roundabout at the bottom of North Hill, SEVERA every day:

<https://www.dropbox.com/s/iq6f8hpm2qgiadk/File%2029-09-2016%2C%2009%2033%2010.mov?dl=0>

**Message:** As you can see from Royal Mail van, it isn't just 'tourists' who don't understand the roundabout, and the Esso garage as well as the American Car Wash cause a lot of trouble at this extremely busy junction. Neither businesses should be allowed on the island. A serious injury or death is just a matter of time.

A couple of years ago, a bus actually drove into one of the houses front garden and the front wall completely.

No one ever consult us on the 'island'. It's like we are the forgotten residents of H

It'd be greatly appreciated if you can acknowledge receipt of this video, and forward it to the relevant parties.

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## Vickers, Ben

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**From:** Chris Mason [REDACTED]  
**Sent:** 01 November 2016 23:33  
**To:** LDF  
**Subject:** Crouch End Neighbourhood Forum comment on the Highgate Neighbourhood Plan

CENF notes the draft plan and suggests that as part of the Neighbourhood Planning process the opportunity ought to be taken to rationalise the Conservation Area boundary. This is particularly pertinent where the two forum areas abut.

On Stanhope Road and we suggest the transfer of the part of the Crouch End Conservation Area west of Stanhope Road (which contain buildings that merit conservation - not all of them do) should be part of the Highgate CA not Crouch End. That would mean the CA boundaries coincide with the Forum boundaries.

The Crouch End Neighbourhood Forum has been encouraged by Haringey Planners to use the process to review the boundaries of designated areas, a process that was resisted when mapping systems were not well resourced a few years ago.

We, therefore, are surprised, given our encouragement, that the Highgate CA boundary has not been proposed for amendment. This seems particularly relevant around the Builders' Merchants site in Muswell Hill Road. It is proposed for redevelopment, yet it remains in a designated conservation area, the character of which it is normally desirable to retain and conserve. It is an ugly site that does not contribute to conservation area character, and being proposed for redevelopment, it follows that it should be taken out of the area to conserve. It perhaps should never have been included in the first place, but we understand there was once a view that there was more negotiating leverage for a better building if the site were to be designated.

The above is now widely regarded as a wrong approach that devalues the meaning of designation. There are now stronger design policies at Borough level and it is widely accepted that CA boundaries should be tightly drawn round the heritage assets. CENF will take this approach as it develops its Design and Character work and expects to propose de designation where the built structures included for a neat boundary are not, in fact, part of the historic character of the area. It would seem sensible for the two adjacent areas producing plans, albeit at different stages in the process, to follow the same logic.

CENF therefore suggest that the conservation area boundary should be reviewed and, among others that may come forward, the above two changes at least be made."

Chris Mason

Lead Member - Design and Character.

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## Vickers, Ben

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**From:** jane steedman [REDACTED]  
**Sent:** 04 November 2016 20:41  
**To:** PlanningPolicy  
**Subject:** Positive comment on Highgate Neighbourhood Plan

Fitzroy Park Allotment Association welcomes the commitment to retaining allotments and green spaces which should be designated assets of community value.

Jane Steedman

Membership Secretary.

**Vickers, Ben**

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**From:** Gareth Davies [REDACTED]  
**Sent:** 02 November 2016 08:59  
**To:** LDF  
**Subject:** Highgate Neighbourhood Plan

Sir / Madam

I am very encouraged and welcome the Highgate Neighbourhood Plan.

I hope this short message allows it to be put into place for the benefit of the area.

Kind regards

Gareth [REDACTED]  
[REDACTED]

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## Vickers, Ben

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**From:** H Kareem <[REDACTED]>  
**Sent:** 02 November 2016 10:51  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Plan

I have only been on the fringes of the Highgate Neighbourhood Plan but am most impressed with the final draft document. I hope especially that it will be successful in helping to diversify the shopping facilities in Highgate Village - and also in relocating the terminus of the 271 bus and in reducing the serious pollution in our atmosphere.

Heloise Kareem  
[REDACTED]

## Vickers, Ben

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**From:** Susan Rose [REDACTED]  
**Sent:** 16 October 2016 10:17  
**To:** LDF  
**Subject:** HIGHGATE NEIGHBOURHOOD PLAN

Highgate CAAC fully supports the above Plan which they have been involved in drawing up. The CAAC considers that the Plan will be greatly to the benefit of the Conservation Area and contribute markedly to its maintenance and indeed conservation. Susan Rose Chair Highgate CAAC

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**Vickers, Ben**

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**From:** Gonet, Teresa <Teresa.Gonet2@highwaysengland.co.uk>  
**Sent:** 03 November 2016 13:43  
**To:** PlanningPolicy; 'localplan@haringey.gov.uk'  
**Cc:** Planning SE; Archer, Heather; Katesmark, Steve; Steve Katesmark  
**Subject:** FAO: Planning Policy Officer Clodagh McGuirk & Camden's Strategic Planning and Implementation Team Highways England response re Highgate Neighbourhood Plan

**For the Attention of:** Planning Policy Officer Clodagh McGuirk  
& Camden's Strategic Planning and Implementation Team

**Consultation:** Highgate Neighbourhood Plan

Dear Clodagh & Camden's Strategic Planning and Implementation Team,

Thank you for your email dated 23 October 2016, advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN). In this case M25, M4 and M1.

Having examined the above documents, we do not offer any comment to this proposal.

**Sent on behalf of Heather Archer (Spatial Planning Manager) at Highways England**

**Teresa Gonet,**  
**OD SE Spatial Planning Team**  
Highways England | Bridge House | 1 Walnut Tree Close | Guildford | GU1 4LZ  
**Tel:** +44 (0) 300 470 1165

Web: [www.highways.gov.uk](http://www.highways.gov.uk), [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)



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Historic England

By email: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
[Erik.Nilsen@haringey.gov.uk](mailto:Erik.Nilsen@haringey.gov.uk)

Our ref: HD/P5008/18  
2187

Strategic Planning and Implementation, Regeneration  
and Planning, London Borough of Camden, Judd Street,  
London WC1H 9JE.

Telephone 0207 973 317  
Fax

Haringey Council  
River Park House, 225 High Road, London N22 8HQ

7 October 2016

Dear Planning Policy Team

### **Highgate Neighbourhood Plan: Representation for examination consultation**

Thank you for consulting Historic England on the revised Neighbourhood Plan for Highgate. The Plan is subject to consultation from both Camden Council and Haringey Council.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed neighbourhood plan for heritage assets. Accordingly, we have reviewed the document against the *National Planning Policy Framework* (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations.

Having reviewed the draft document we can offer the following observations and suggestions

#### **General comments**

Historic England commented in detail on the initial draft of the Plan (letter to Camden dated 20 April 2015). In our letter we raised a number of issues in respect of the design and environmental policies which, in our view, required clarification and revision. The current Plan largely addresses those issues and offers a clear vision for a sustainable neighbourhood and reflects the wide consultation undertaken in the preparation of the document.



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Highgate offers an exceptionally rich historic environment within London and we are pleased that this is recognised in the core objectives of the Neighbourhood Plan. In our view the challenges set out within the Highgate Neighbourhood Plan are correctly identified and the proposed policies will help address long standing cross-borough boundary issues and the significant effects of traffic, which can be detrimental to both the appreciation of the historic environment and overall quality of life in Highgate.

As such we do not wish to comment in detail but can offer the following suggestions which serve to clarify the proposed heritage policies and commentary.

Page 56 Policy DH3. We would suggest a minor revision as follows: "Development should respect and preserve existing architectural features *where these contribute to local character and appearance*, for example projecting bays and decorative balconies".

**Reason.** To ensure this policy does not prevent the removal of later alterations or features which detract from local character.

Page 57 Policy DH6. We recognise that in many instances that original boundary walls are likely to contribute positively to the character and appearance of the area. However, the proposed wording potentially imposes protection exceeding that applied under NPPF policies 132 to 134. We would suggest that the statement "The removal of original boundary walls, gate piers or railings should be permitted only where justifiable due to their structural condition" is caveated by *and/or where their loss is demonstrably outweighed by the public benefits and where any replacement will demonstrably preserve or enhance local character and appearance*.

**Reason.** This will bring the policy in line with the NPPF policies 132 to 134.

As the reason for this policy is the loss of original boundary treatments it should make plain that it may also be desirable to reinstate boundary treatments where these have been lost. It would be helpful to clarify this in the commentary.

Policy DH6 III. We presume the intention of this policy is to ensure that new development does not result in a loss of the existing visual permeability or public accessibility where this contributes positively to local character. The policy would benefit from being revised to better reflect this intention.

**Reason** To better reflect the intentions of the proposed policy.

Policy DH11: Archaeology. The archaeological policy does not reflect the NPPF's and the emerging Development Management DPD Policy DM9's (Camden's Policy 25) emphasis on understanding the archaeological resource with a view to the preservation and enhancement of archaeological sites. Neither does it reflect the current use of Archaeological Priority Areas to manage the impact of planning proposals on the archaeological resource, again this is outlined in Policy DM9. Both Haringey and Camden will need to be content that any Neighbourhood Plan Policy is compatible to local plan policies.



Page 64 Figure 14 on p64 of the Neighbourhood Plan is rather unclear and does not refer to the Archaeological Priority Areas currently in use. As Figure 14 does not clearly show where

the current APA's are located it would be useful to update this figure using those APA's mentioned in the relevant Camden and Haringey DMP Policies and supporting Map base.

Unfortunately, the current programme for Camden's APA's will be reviewed in 2017 and Haringey's in 2021 and these are reviewed on a borough wide scale rather than individual APA level.

Further guidance on the management of APA's in Greater London was published by Historic England in June 2016 <https://content.historicengland.org.uk/images-books/publications/greater-london-archaeological-priority-area-guidelines/heag098-glaas-archaeological-priority-areas.pdf/>

We would be happy to provide further advice in respect of any of the above, or other, issues, if this is helpful.

It must be noted that this advice does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.

Yours sincerely

[Redacted signature]

Richard Parish  
Historic Places Adviser  
London Team  
020 7 973 3717



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
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**Vickers, Ben**

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**From:** Jai Singh [REDACTED]  
**Sent:** 02 November 2016 19:15  
**To:** LDF  
**Cc:** Jai Singh  
**Subject:** Highgate Neighbourhood Plan

As a resident of Highgate for almost 28 years, I wish to state that I subscribe to the objectives, vision and the plan.

Jai P. Singh  
[REDACTED]

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## Vickers, Ben

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**From:** James Lau [REDACTED]  
**Sent:** 02 November 2016 13:37  
**To:** PlanningPolicy; localplan@haringey.gov.uk  
**Cc:** sarah.elliott@haringey.gov.uk  
**Subject:** Highgate Neighbourhood Plan

To Whom it may concern,

I refer to the latest Highgate Neighbourhood Plan Submission Draft dated July 2016 and in particular Section 4 regarding KS2 - Former Highgate Station Buildings and Surrounds.

This is my 3<sup>rd</sup> attempt at making some points from a resident's point of view.

1. There has been very little if at all any communication in terms of consultation with regards to analysis and exploration with local residents about the potential site around Highgate Station. As our house largely borders entirely along the site, I would have thought there would be more discussion with us actual residents who will be directly affected.
2. Any future development of the site will undermine the character of Priory Gardens by additional traffic, noise and unwanted antisocial behaviour.
3. Linking the Parkland Walk from KS5 into KS2 will have no real benefit. Extending the walk through the long tunnels and within a deep valley towards Highgate tube will only encourage more graffiti, antisocial behaviour and let's be honest, not be the most pleasant place to be as a lone cyclist / walker. I can understand the reasons why linking the site would be lovely, but on a practical level, it would be a nightmare.
4. The privacy we enjoy from the property as well as our garden will be completely lost if any future development is carried out.
5. There is NO mention at all about careful design or planning with regards to welfare of neighbouring properties. The bats in the tunnels get a mention – at least we know where we stand in terms of being heard!

I Look forward to hearing from you to acknowledge that someone has actually read this email or my previous emails, but I doubt it - seeing as the Highgate Neighbourhood Forum email I am responding to only asked for short positive responses to the Draft Plan, then I suspect that comments such as mine will go unheard for another few years.

Kind regards

James Lau  
[REDACTED]

**Vickers, Ben**

---

**From:** Janice Morgan [REDACTED]  
**Sent:** 02 November 2016 08:34  
**To:** LDF  
**Subject:** HNF plan N6

I fully support this Neighbourhood Plan which has been developed over the past years in N6. There has been research argument inspiration happiness and despair but it is right now to have it welcome it and use it. Thanks Haringey for all your support.

Janice Morgan  
[REDACTED]

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**Vickers, Ben**

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**From:** Jeffrey Salmon [REDACTED]  
**Sent:** 02 November 2016 08:46  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Plan

Just a short note to confirm I found the plan to be concise, independent and "understandable" and deeply informative.

Jeff Salmon



## Vickers, Ben

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**From:** Jennifer Horne-Roberts [REDACTED]  
**Sent:** 03 November 2016 11:45  
**To:** PlanningPolicy  
**Subject:** Neighbourhood Plan for Highgate

Dear Sir/Madam,

My husband Keith Roberts(Architect) and I (a Barrister,writer and artist) live locally.  
We fully endorse the Plan as drafted, especially the proposal for community use for the Highgate Bowl.  
We are Trustees of the Harington Scheme which is situated within the Highgate Bowl.

Sincerely  
Jennifer Horne-Roberts.



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## Vickers, Ben

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**From:** Joanne Fraser [REDACTED]  
**Sent:** 02 November 2016 16:10  
**To:** LDF  
**Subject:** Highgate Neighbourhood Plan

As a long-term resident of Highgate (since 1999) I applaud the aims and objectives of the Highgate Neighbourhood Plan. In particular, I am impressed with its even-handed and practical approach: the plan emphasises the retention, protection and enhancement of the many valuable historic buildings and sites in the area while also promoting positive development to ensure its continued prosperity, diversity and vibrancy. Highgate is a wonderful place to live because of its mix of good housing, green spaces, community amenities and cohesive atmosphere. The Highgate Neighbourhood Plan will play a significant part in ensuring that Highgate not only retains all of this, but also thrives and grows in a way that benefits everyone.

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**Vickers, Ben**

---

**From:** Katharine Ridler [REDACTED]  
**Sent:** 03 November 2016 15:36  
**To:** PlanningPolicy  
**Cc:** [REDACTED] Plan

Dear Sir/Madam,

As a resident of Highgate (on [REDACTED]) I fully support the plan! Living on the border with Islington, Camden and Haringey makes me fully aware that this plan is vital for the sustainable, progressive future that most residents need and would wish. Please pass it!

Yours faithfully,

Katharine Ridler

**Vickers, Ben**

---

**From:** Gibb, Jonathan <Jonathan.Gibb@islington.gov.uk> on behalf of LDF <LDF@islington.gov.uk>  
**Sent:** 04 November 2016 13:43  
**To:** PlanningPolicy  
**Subject:** RE: Highgate Neighbourhood Plan submission consultation

Thank you for consulting the London Borough of Islington on the Submission draft of the Highgate Neighbourhood Plan.

Having reviewed the content, whilst we have no major concerns, we would like to highlight the importance of considering cross boundary impacts where appropriate given that parts of the plan area are immediately adjacent to the borough boundary, including Conservation Areas and residential areas in the borough. Archway Town Centre is also in close proximity to the neighbourhood area. It would be useful for this wider context to be recognised, where appropriate. This could be emphasised in the objectives/vision section as well as relevant policies, for example, in relation to Basement Development and Conservation Areas.

We would like to reserve the right to appear at the examination hearings and respond to any matters or proposed changes to the plan that may arise as a result of the examination process.

---

**From:** PlanningPolicy [mailto:PlanningPolicy@camden.gov.uk]  
**Sent:** 23 September 2016 15:57  
**Subject:** Highgate Neighbourhood Plan submission consultation

Dear Sir / Madam

**Re: Highgate Neighbourhood Plan**

Highgate Neighbourhood Forum has submitted their proposed Neighbourhood Plan to Camden Council and Haringey Council, in accordance with the Neighbourhood Planning Regulations 2012.

We are consulting residents and interested stakeholders on this proposed Plan.

**How does this affect me?**

A Neighbourhood Plan is a statutory planning document setting out planning policies for the development and use of land in the area. The Plan sets out a range of policies on matters including design quality, green and open spaces, retail and transport. There are also a number of policies relating to individual areas and sites in Highgate.

The Neighbourhood Plan, if approved, will be used alongside the relevant policies of the Councils, in making decisions on planning applications in the neighbourhood area.

To view the proposed Neighbourhood Plan and supporting documents (including a map showing the boundary for the Plan) please go to: [www.camden.gov.uk/neighbourhoodplanning](http://www.camden.gov.uk/neighbourhoodplanning)

Hard copies of the Plan and documents are available to view at the following locations:

	<b>Opening hours</b>
5 Pancras Square Library, London N1C 4AG	Monday to Saturday 8am to 8pm, Sunday 11am to 5pm

Highgate Library, Chester Road, London  
N19 5DH

Monday closed,  
Tuesday to Wednesday 10am to 5pm,  
Thursday 10am to 7pm,  
Saturday 10am to 4pm,  
Sunday closed

## How do I make a representation?

The Council has prepared some advice on how to make a representation on the neighbourhood plan. This is included as part of the 'Statement of Representations Procedure' and may be viewed on this [webpage](#) and at the locations listed above.

Comments on the Plan and supporting documents must be received by **Friday 4<sup>th</sup> November 2016** and can be made in the following ways:

**By e-mail:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

**By post:** Strategic Planning and Implementation, Regeneration and Planning, London Borough of Camden, Judd Street, London WC1H 9JE.

**All of the representations will then be forwarded to an independent examiner to consider who will assess the Plan against a number of 'Basic Conditions'.**

If you have any further queries please contact Camden's Strategic Planning and Implementation team on 0207 974 8988.

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## Vickers, Ben

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**From:** Barry and Louise Lewis [REDACTED]  
**Sent:** 04 November 2016 21:26  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Forum Plan

This is a well thought through, thorough plan which in general terms I support. I would have liked to see more on sustainability, locally generated 'green' power and free wifi access across the area. More specifically I would like to see a commitment to making the area more accessible to wheelchair users, particularly the Haringey side of Highgate High Street. However I am pleased with proposals to co-ordinate both the Camden and Haringey parts of the area. Overall I welcome and support this plan.

## Vickers, Ben

---

**From:** martin [REDACTED]  
**Sent:** 02 November 2016 10:05  
**To:** PlanningPolicy  
**Subject:** highgate neighbourhood plan

I have lived in the Highgate area for over 40 years and I welcome the Highgate Neighbourhood Plan which I have read in detail. I particularly welcome the opportunity it has presented to plan Highgate as a whole taking in both the Haringey and Camden parts of the village. I hope the councils will continue to support this and work on combined approaches and policies particularly around the High St and village centre. The plan's proposals seem sensible and I am very much in favour of the proposals for ensuring that the Highgate Bowl remains an area of open space ( and an SLOL as proposed by Haringey) and that it might become public open space.

Martin Adeney  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Vickers, Ben**

---

**From:** Mary Holtby [REDACTED]  
**Sent:** 10 October 2016 13:16  
**To:** LDF  
**Subject:** Highgate Neighbourhood Plan

I fully support the application for the Highgate Neighbourhood Plan to be approved by your Council and am full agreement with all the aims and objects set out in this plan

Mary Holtby

[REDACTED]

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**Vickers, Ben**

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**From:** Liz Morris [REDACTED]  
**Sent:** 03 November 2016 17:01  
**To:** LDF  
**Subject:** FW: Neighbourhood Plan

Please see a submission at the bottom of this email. Please confirm receipt

Kind regards

Liz Morris

Councillor and Deputy Leader  
Highgate Ward / Liberal Democrat Party

-----Original Message-----

**From:** Michael Hammerson [mailto:[REDACTED]]  
**Sent:** 01 November 2016 20:38  
**To:** Liz Morris  
**Subject:** Neighbourhood Plan

Liz,

Sorry to trouble you with this; but since my e-mail provider was transferred to another server, I have been unable to send e-mails to people on certain servers; and, very awkwardly, Haringey is one of them - though not Camden or the City of London. I am therefore unable to send my note vote of support to them.

Could I impose on you, therefore, to forward the brief message below to them (localplan@haringey.gov.uk) on behalf of a constituent who is having email problems as is currently unable to communicate directly to Haringey by e-mail!

Many thanks

Michael

(Strangely, though, I can still receive emails from Haringey. My computer person is supposed to be working on it)

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I wish to register my support for the Plan as currently proposed for Public Examination.



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Date: 07 October 2016  
Our ref: 197014



Regeneration and Planning  
London Borough of Camden  
Judd Street  
London WC1H 9JE

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Camden's Strategic Planning and Implementation team

**Planning Consultation: Highgate Neighbourhood Plan**

Thank you for your consultation on the above dated 23/09/2016

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. If you would like to arrange a meeting to discuss your neighbourhood plan, green infrastructure or other environmental planning I would be happy to attend.

**NO OBJECTION**

Natural England considers that the proposed Highgate Neighbourhood Plan will not have significant adverse impacts on designated sites and has no objection.

Natural England supports the Highgate Neighbourhood Plan particularly Core Objective 4 which includes a provision to *"improve those areas of SSSI, SINCE and MOL which are currently in unfavourable or declining condition through complementary decision-making relating to the use of adjacent sites"*.

We also support Policy OS2 for the protection of Veteran Trees and Policy OS4 for the protection and enhancement of *"Biodiversity and Ecological Corridors"* and the promotion of Green Infrastructure.

For clarification of any points in this letter, please contact Kirsty Macpherson on 07775543864. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Kirsty Macpherson  
Lead Adviser Buckinghamshire  
Sustainable Development and Regulation  
Thames Valley Team

**Vickers, Ben**

---

**From:** Nicholas Moore [REDACTED]  
**Sent:** 03 November 2016 13:44  
**To:** LDF  
**Subject:** Highgate Local Plan

I have seen the current draft of this and just wish to record that I am in favour of it.

Nicholas Moore

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**Vickers, Ben**

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**From:** Nicole Caine [REDACTED]  
**Sent:** 03 November 2016 10:49  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Plan

To whom it may concern,

We are writing to give our full support to the Highgate Neighbourhood Plan which has been submitted to the council.

Yours sincerely

Nicole and Seymour Forsyth  
[REDACTED]

**Vickers, Ben**

---

**From:** sarita singh [REDACTED]  
**Sent:** 03 November 2016 15:22  
**To:** LDF  
**Subject:** Hooray for the Highgate Neighbourhood Forum

Dear Council Members

Comgratulations and thank you for all your hard work to get the HNF to its lift off stage.

Looking forward to its further embodiment and good luck with the next steps.

sarita

---

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**Vickers, Ben**

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**From:** Zoe Hughes <Zoe.Hughes@sportengland.org>  
**Sent:** 26 September 2016 12:00  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Plan submission consultation

Thank you for consulting Sport England on the above Neighbourhood Consultation.

Planning Policy in the **National Planning Policy Framework** identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, '**A Sporting Future for the Playing Fields of England – Planning Policy Statement**'.

<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Sport England provides guidance on developing policy for sport and further information can be found following the link below:

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team  
Planning.south@sportengland.org





Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



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**Vickers, Ben**

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**From:** Stephen Panke [REDACTED]  
**Sent:** 02 November 2016 08:59  
**To:** LDF  
**Subject:** Highgate Neighbourhood Forum

Highgate Neighbourhood Forum

The draft Neighbourhood Plan is an excellent, considered, thoughtful document which has given the local community a chance to have their say in the future shape and running of Highgate. I thoroughly support the document and look forward to the next stage of the process.

*Stephen Panke*

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## Vickers, Ben

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**From:** sbchinn [REDACTED]  
**Sent:** 02 November 2016 15:43  
**To:** LDF  
**Subject:** highgate neighbourhood forum plan

This is a carefully worked out, extensive and positive plan. I support it.

Susan Chinn [REDACTED]

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**Vickers, Ben**

---

**From:** Tamar Karet [REDACTED]  
**Sent:** 02 November 2016 09:46  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Forum

Dear Camden Council,

I am writing to support the Highgate Neighbourhood Forum's plan for our area. As the Editor of Buzz, the Highgate Society's magazine, I know that they have been discussing, researching and consulting for several years to develop the best possible proposals for this area. I do hope you will approve it as soon as possible.

Yours faithfully,

Tamar Karet  
[REDACTED]

## Vickers, Ben

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**From:** McGuirk Clodagh <Clodagh.McGuirk@haringey.gov.uk>  
**Sent:** 07 November 2016 11:38  
**To:** PlanningPolicy  
**Subject:** Highgate Neighbourhood Plan - responses sent to Haringey  
**Attachments:** FW Neighbourhood Plan; RE Highgate Neighbourhood Plan; Highgate Neighbourhood Plan; Hooray for the Highgate Neighbourhood Forum; Highgate Local Plan; FAO Planning Policy Officer Clodagh McGuirk & Camden's Strategic Planning and Implementation Team Highways England response re Highgate Neighbourhood Plan; Neighbourhood Plan for Highgate; Highgate Neighbourhood Plan; Highgate Neighbourhood Plan; Highgate Neighbourhood Plan

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Date: 4th November 2016  
Our Ref: Highgate Neighbourhood Plan Response

## Commercial Development

Transport for London  
5<sup>th</sup> Floor North Wing  
55 Broadway  
London  
SW1H 0BD

Phone: 020 3054 7536  
Email: [rebeccasladen@tfl.gov.uk](mailto:rebeccasladen@tfl.gov.uk)

By email

Dear Sir/Madam,

### **RE: Consultation on the draft Highgate Neighbourhood Plan**

Thank you for consulting Transport for London (TfL) on the draft Highgate Neighbourhood Plan. The following comments represent the views of officers in Transport for London Commercial Development Property Team (TfL Property) in its capacity as a significant landowner and does not form part of the TfL corporate response. Our colleagues in TfL Planning have provided a separate view regarding TfL wide operational and planning/policy matters.

TfL Property supports the principle objectives of the draft Highgate Neighbourhood Plan, which aims to deliver a more cohesive and joined up approach on planning and transport policy in Highgate over the next 15 years.

#### **KS1: 460-470 Archway Road**

Key Site 1 identifies 460-470 Archway Road as having the potential to deliver a mix of residential and employment development on site. This is in line with the site allocation SA38 identified within the Haringey Site Allocations DPD pre-submission draft. Whilst TfL Property supports in principle the site allocation for 460-470 Archway Road, we would like to take this opportunity to highlight several land interests on the site which have not been highlighted in Policy KS1.

Policy KS1 fails to acknowledge that a London Underground air shaft is located on site (shown shaded blue in the attached plan). TfL Property requests that the Policy KS1 is reworded to ensure that any future development on site does not impact on the operational requirements of the air shaft.

The site boundary on page 67 also includes TfL Freehold land (shown on the attached plan), which is required for operational purposes and is not being brought forward as part of a development scheme on the site. TfL Property requests that the red line boundary of KS1 be redrawn to reflect the actual site boundary.

KS1 is located adjacent to the Highgate Depot. TfL has a 24 hour right of access across the western side of KS1 to the Depot. Any site development will have to ensure that such access is retained. TfL Property requests that the Policy KS1 is therefore reworded to ensure that this is being addressed.

This access point is important for the depot as it is in constant use. It is expected that the existing maintenance shed will be re-sited to a location opposite KS1 to provide improved depot stabling capacity and a modernised maintenance facility in keeping with the World Class Capacity Northern Line Upgrade requirements. Eventually the modernisation of the depot would lead to the creation of additional highly skilled engineering jobs as well as an apprenticeship scheme.

**KS2: Former Highgate Station Buildings and Surrounds**

TfL is the sole land owner of KS2 (see attached plan). TfL Property acknowledges the aspirations of KS2 to reuse and enhance the former Highgate station building for community and educational uses, which is in line with site allocation SA40 identified within the Haringey Site Allocations DPD pre-submission draft. However, we also recognise the importance of maintaining the existing and future operational requirements of the former Highgate station building and surrounding land. At present, there are no plans to reuse this building for community and educational uses, but we are currently reviewing our entire portfolio of land which will include exploring opportunities on this site.

TfL Property therefore also recommends the following rewording of Policy KS2 for clarity.

*“1. The development includes the sensitive reuse of the existing **locally** listed station buildings and platforms for the provision of a mix of flexible community and educational uses. “*

I would be grateful if you could confirm receipt of this letter and would welcome further discussions into the issues outlined within this response. In the meantime, should you have any queries please do not hesitate to call 020 3054 7536.

Yours sincerely



**Rebecca Sladen**  
Consents Advisor, Commercial Development

Cc:  
**Patricia Cazes-Potgieter**, Planning Development Manager, Commercial Development



# Location Plan- KS1



Landscape

Date: 04/11/2016 15:24:17

User: rebeccasladen@tfl.gov.uk

Scale: 1:1250 at A4





# Location Plan- KS2

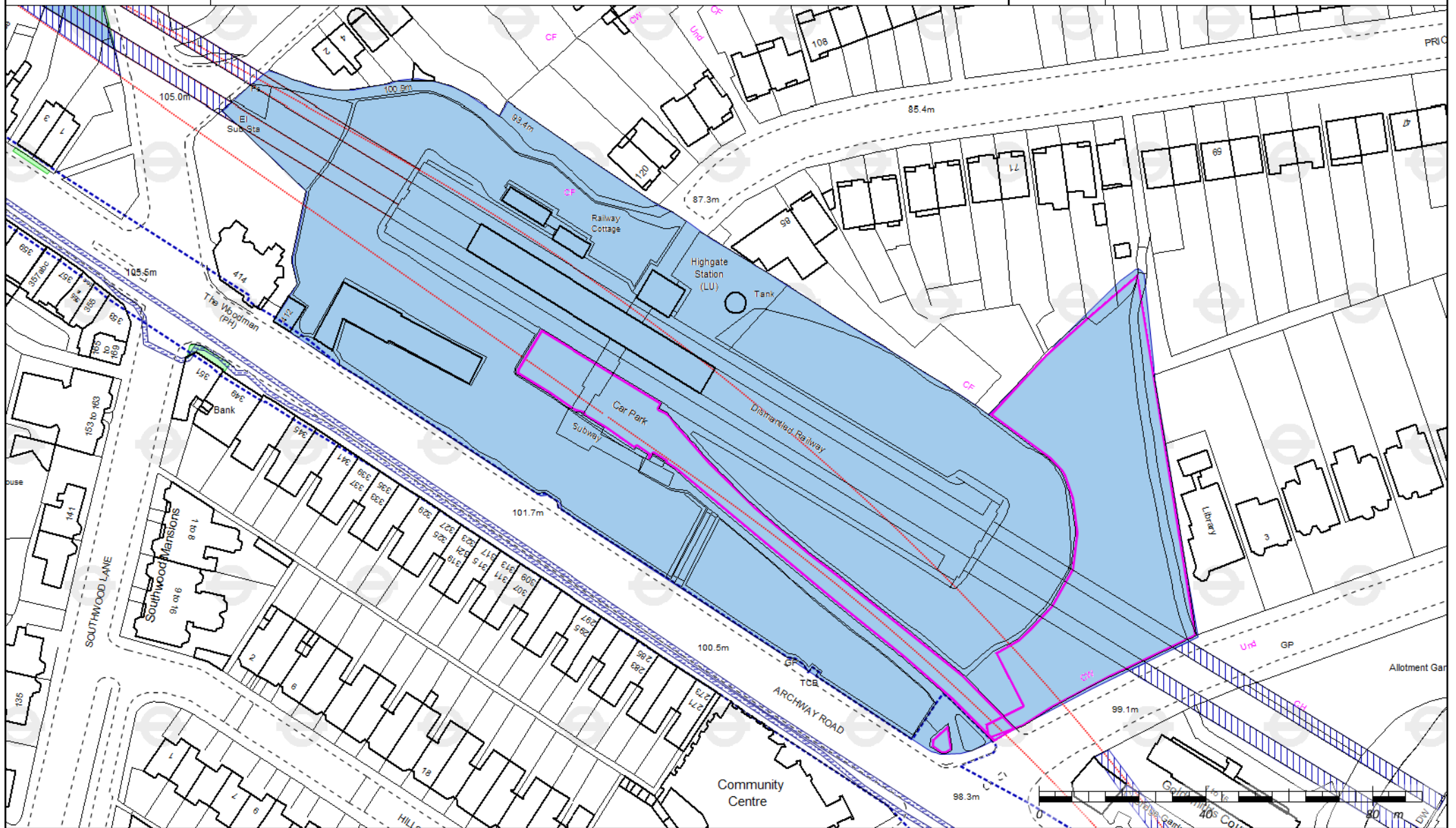


Landscape

Date: 04/11/2016 15:31:37




















User: rebeccasladen@tfl.gov.uk

Scale: 1:1250 at A4



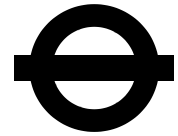


# Property Asset Register (PAR) Legend

	<i>DLR Freehold</i>		<i>LBSL Running Rights</i>		<i>Lease/Licence/Easement/Right Granted</i>
	<i>DLR Leasehold</i>		<i>LBSL Agreement for Lease</i>		<i>Option to Acquire</i>
	<i>DLR Licence</i>		<i>LBSL Incomplete Docs</i>		<i>Rights General / Easement Taken</i>
	<i>DLR Stratum</i>		<i>LBSL Informal Agreement</i>		<i>Tunnels</i>
	<i>LUL Running Rights</i>		<i>LBSL Internal Licence</i>		
	<i>LUL Stratum</i>		<i>LBSL Licence</i>		
	<i>LUL Parliamentary</i>		<i>LBSL Leasehold</i>		
	<i>LUL Agreement for Lease</i>		<i>LBSL Freehold</i>		
	<i>LUL Incomplete Docs</i>		<i>RFL Run Rights Alignment</i>		
	<i>LUL Informal Agreement</i>		<i>RFL Running Rights</i>		
	<i>LUL Internal Licence</i>		<i>RFL Stratum</i>		
	<i>LUL Licence</i>		<i>RFL Agreement for Lease</i>		
	<i>LUL Leasehold</i>		<i>RFL Incomplete Documents</i>		
	<i>LUL Freehold</i>		<i>RFL Informal Agreement</i>		
	<i>TfL Road Network Outline</i>		<i>RFL Internal Licence</i>		
	<i>GLA Freehold</i>		<i>RFL Licence</i>		
	<i>GLA Leasehold</i>		<i>RFL Leasehold</i>		
	<i>LRS Licence</i>		<i>RFL Freehold</i>		
	<i>LRS Leasehold</i>		<i>TFL Stratum</i>		
	<i>LRS Freehold</i>		<i>TFL Agreement for Lease</i>		
			<i>TFL Incomplete Docs</i>		
			<i>TFL Licence</i>		
			<i>TFL Vested Leasehold</i>		
			<i>TFL Leasehold</i>		
			<i>TFL Vested Freehold</i>		
			<i>TFL Freehold</i>		
			<i>TFL Internal Licence</i>		
			<i>TFL Informal Agreement</i>		

- TFL - Transport for London
- LUL - London Underground Ltd
- DLR - Docklands Light Railway
- LRS - London River Services
- LBSL - London Buses Services Ltd
- LDA - London Development Agency
- RFL - Rail for London Ltd
- GLA - Greater London Authority
- GLA L & P - Greater London Authority Land & Property

# Transport for London



**To:** [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
**From:** George Snape and Nathan Cheung  
**Phone:** 020 3054 7055  
**Date:** 01/11/16  
**RE:** **Highgate Neighbourhood Plan**

Thank you for consulting TfL on the draft version of the Highgate Neighbourhood Plan.

The Highgate neighbourhood plan area straddles the boroughs of Haringey and Camden. TfL's principal interest in the area is related to Highgate Underground Station, in the north of the plan area, which serves the High Barnet branch of the Northern Line. The station is on the A1, Archway Road which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and any works temporary or permanent would need to be agreed with TfL. There are several bus services operating in the Highgate area. As a result the Public Transport Accessibility Level (PTAL) ranges from 6a (highly accessible) around Highgate station on Archway Road, to 1b/2 (poor accessibility) to the west of Highgate High street on Hampstead Lane

The aspirations for the neighbourhood plan are to; encourage the use of sustainable transport whilst minimising the pressures on parking throughout the plan area. The overall aims of the neighbourhood plan accord with Policy 6.1 of the London Plan which TfL supports. It is worth noting that a major issue affecting the bus network in Highgate is the increase in journey times which can deter potential passengers from using the bus network. TfL suggests that this issue be acknowledged in '3.3.1 Aspirations' and addressed within policy TR1 and TR3.

Policy TR1 aims to promote sustainable transport and ensure that developments are accessible to public transport. Although TfL welcomes any proposals to promote sustainable transport, the policy would benefit from identifying specific locations where "road crossings are unsafe" or "cycling facilities are poor". Given the PTAL range highlighted above, Policy TR1 should look to improve access to public transport facilities at locations such as Highgate station. Furthermore TfL would consider it appropriate for Policy TR1 to acknowledge that bus journey time reliability should be improved to promote sustainable transport.

Policy TR2 is concerned with managing servicing and construction vehicles due to the tight grid of roads throughout the plan area. TfL supports any measures to manage servicing and construction vehicles and recommends that developers follow TfL's guidance on producing Construction Management Plans (CMPs) and Delivery and Servicing Plans (DSP). Further guidance can be found at:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>

Policy TR3 aims to minimise traffic from new developments. TfL supports the policy's general aims but considers the policy could be reworded to encourage parking restraint, particularly in highly

accessible areas as it currently appears too generous in relation to providing car parking for developments. Providing on site car parking will not reduce congestion on the roads and in that regard, Policy TR3 is contradictory to the plan's overarching aspirations. The policy could also encourage a restrained approach to parking for educational uses particularly where they serve a local catchment and therefore present an ideal opportunity to promote sustainable travel.

Policy TR4 aims to reduce the negative impact of car parking in Highgate. The policy requires developments in a CPZ, currently the land east of Highgate High Street and West of Archway Road, or at PTAL 4 and above to be car free. The policy should therefore highlight that such developments could be subject to a permit free obligation by Haringey/Camden Councils. Policy TR5 states that dropped kerbs will not be supported in the CPZ except under specific circumstances. TfL would urge the caveat to be removed from TR5 in order to make it more robust.

The neighbourhood plan has identified a series of infrastructure requirements to meet Highgate's transport and traffic needs, TfL requires further clarification from these proposals in order to provide detailed comments. TfL suggests that the need to reduce bus journey times be acknowledged in the list of non- statutory actions

With regard to CA22, TfL considers there to be good East – West bus routes provided across Highgate. Route 210 provides a direct link to the west to the northern end of Hampstead, to Golders Green and to Brent Cross via Hampstead Lane and Spaniards Road. It also provides links to the east to Archway, Crouch Hill and Finsbury Park. Similarly, route C11 provides a link to Archway, and to Hampstead, Finchley Road, Cricklewood and Brent Cross in the west. There are a number of other routes to Archway, which is a key interchange point to reach multiple other destinations. Furthermore, routes 43 and 134 also provide links to north east of Highgate to destinations such as Muswell Hill. Policy CA22 identifies no specific locations which the plan considers to be underserved by bus services and so TfL is unable to provide further detailed comment.

The draft Neighbourhood Plan identifies key sites that could see development proposals come forward. Key Site 1 (KS1) on 460 – 470 Archway Road states that a new access would be required onto the A1. TfL would require greater levels of details for these proposals before a comment could be made on its suitability as generally TfL does not endorse the creation of new access points on the TLRN, particularly where alternatives are available.

TfL has land holder interests in both KS1 (460-470 Archway Road) and KS2 (former Highgate Station Buildings and Surrounds). Transport for London are aware of KS2 High Level Station being designated in the Draft Highgate Neighbourhood Plan. TfL is aware of the allocation of the depot site in the London Borough of Haringey's Local Plan and the subsequent proposed Highgate Neighbourhood Plan. TfL would like to remind the neighbourhood forum that the site remains in operational use and incorporates London Underground Northern line stabling and control centre functions. At present, there are no plans to reuse the former Highgate Station building for community and educational uses, but we are currently reviewing our entire portfolio of land which will include exploring opportunities on the former Highgate Station Building. As the allocation suggests any onward development would need to incorporate these operational functions. In terms of the tunnels to the north and south of the site, there are sensitivities relating to opening up these links which require further discussion with TfL.

TfL Property will be submitting a separate response regarding these sites in its capacity as a significant landowner.

I would be grateful if you could confirm receipt of this letter and would welcome further discussions into the issues outlined within this response. In the meantime, should you have any queries please do not hesitate to call 020 3054 7055.

Yours Sincerely

George Snape

**Assistant Planner, Borough Planning Central Team**

26 October 2016  
Highgate NP



Sent by email to: [localplan@haringey.gov.uk](mailto:localplan@haringey.gov.uk)

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Dear Sir/Madam

## **HARINGEY – HIGHGATE NEIGHBOURHOOD PLAN – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD**

Thames Water Utilities Ltd (Thames Water) Property Services function is being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Haringey Borough and Highgate and are hence a **"specific consultation body"** in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We previously made comments on behalf of Thames Water last year and in January which have not all been taken into account in the revised consultation document so we re-make them below:

### **Policy OS3: Local Open Space**

**Site LSD7** includes Thames Water operational land used as a storm tank (refer to enclosed plan). Whilst the site may appear as an open space with grassed areas on top, a large man made structure (concrete tank) exists underneath which needs to be periodically maintained to ensure its integrity. There is currently no public access to this site for security and health and safety reasons. Thames Water therefore strongly object to its allocation as Local Green Space.

As part of the LB Haringey call for sites Thames Water did confirm that the site is currently retained for operational use, but Thames Water are examining the operational requirements of their land holdings and the site could potentially be made available for redevelopment. For example, residential development on the site could enable the storm tank facility to be replaced. Alternatively the site could be included within a comprehensive redevelopment including the adjoining site to the west which could enable the provision of some open space.

**Site LSD11** is also owned by Thames Water and leased to LB Haringey. The land is retained by Thames Water as retained operational land for future operational use. Thames Water therefore strongly object to its allocation as Local Green Space.

### **Omission of Policy Covering Water Supply and Sewerage/Wastewater Infrastructure**

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of

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existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: ***“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”***

Paragraph 162 of the NPPF relates to infrastructure and states: ***“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”***

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that ***“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).***

Policy 5.14 of The London Plan, March 2015 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and Policy 5.15 relates to water use and supplies.

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. It is unclear at this stage what the net increase in demand on Thames Water’s infrastructure will be as a result of the Key Sites identified in the Neighbourhood Plan. It is therefore essential that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be delivered prior to any occupation of the development.

Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:

- The developments demand for water supply and network infrastructure both on and off site and can it be met;
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met

When carrying out the necessary early consultations with Thames Water regarding the capacity of water and wastewater infrastructure, in respect of development proposals, adequate time should be allowed so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of days. For example, the modelling of water and wastewater infrastructure will be important to many consultation responses and the time requires for responses must not be underestimated. For example, the modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows. Therefore, consultation should be undertaken as early as possible with Thames Water regarding the capacity of water and wastewater infrastructure to serve development proposals. Adequate time must be allowed for a high level risk assessment to be undertaken. Should more comprehensive responses be required, it is likely that more detailed modelling work will need to be undertaken. The necessary funding for this work will need to be identified and secured through Developers and/or partnership working. It can take approximately 3 months to complete modelling work from the point funding has been secured.

Thames Water consider that text along the lines of the following should be added to the Neighbourhood Plan:

**“Water Supply, Wastewater & Sewerage Infrastructure**

*Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.*

*Drainage on the site must maintain separation of foul and surface flows.*

*Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.*

*Further information for Developers on water supply and sewerage infrastructure can be found on Thames Water’s website at:*

*<http://www.thameswater.co.uk/home/11425.htm>*

*Or contact can be made with Thames Water Developer Services*

*By post at: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading RG1 8DB;*

*By telephone on: 0800 009 3921;*

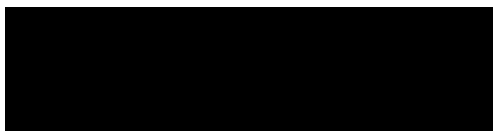
*Or by email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)”*

**Policy DH7:Basements**

Thames Water wholly support requirement 3.II as this is in line with their previous representations.

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

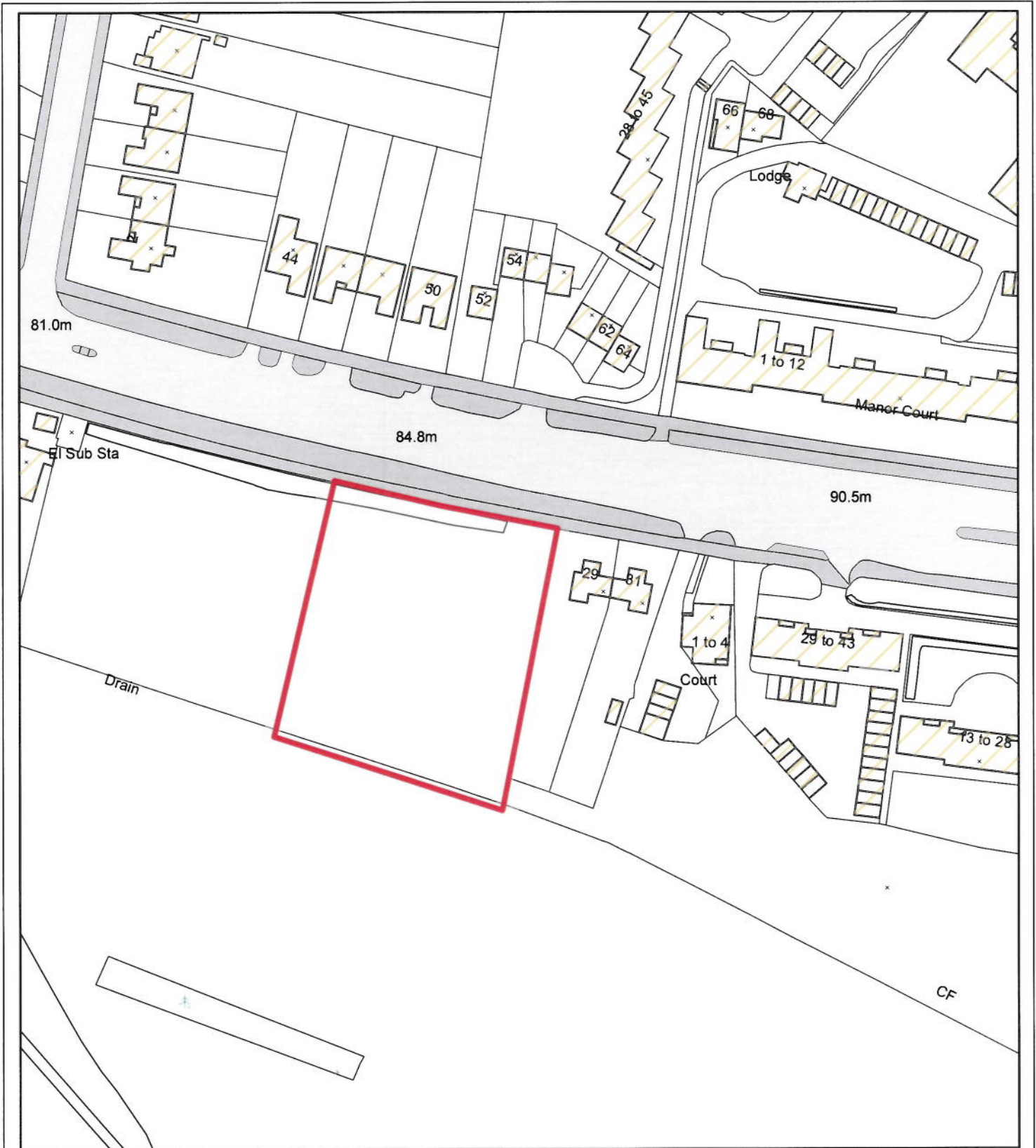
Yours faithfully



David Wilson BA (Hons), BTP, MRTPI  
Associate Director Planning



# Land at Aylmer Road, adjacent Bishops Wood Reservoir



**Thames Water**  
Map

Printed By : CCOLLOFF  
 Print Date : 01/05/2013  
 Map Tile Name: 56346

0 5 10 20 30 40  
 Meters  
 Current Scale : 1:1,250



Comments:

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## Vickers, Ben

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**From:** Tye Blackshaw [REDACTED]  
**Sent:** 02 November 2016 16:50  
**To:** LDF  
**Subject:** Highgate Neighbourhood Plan

To whom it may concern;

I would like to register my strong support for the Highgate Neighbourhood Plan, which will provide a much needed layer of planning control and community involvement across the whole of the Highgate Area.

Yours faithfully,

[REDACTED]

[REDACTED]

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## Vickers, Ben

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**From:** Yolanda Corden [REDACTED]  
**Sent:** 02 November 2016 12:02  
**To:** LDF  
**Subject:** Comments

I have not been directly involved in developing the Highgate Neighbourhood Plan, although I have contributed comments on a couple of issues.

I commend all that is contained within the Plan. It creates a vision of enhanced community cohesion across the range of issues that contribute to the overall living environment and are of interest to those of us living in Highgate.

The preservation of the intrinsic nature of the village and other parts of Highgate, and resistance to developments which would negatively change the nature of Highgate are paramount.

Of particular concern are the appearance of further empty shops in Highgate Village due to unaffordable rents. We are fortunate to retain the greengrocer, the butcher, the old Post Office, the book shop, The Gatehouse and other local shops and pub/restaurants. It is good to be able to shop locally for at least some everyday foods. We do not need more estate agents.

Yolanda Corden

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4 November 2016

London Borough of Camden  
<mailto:planning.policy@camden.gov.uk>

London Borough of Haringey  
[localplan@haringey.gov.uk](mailto:localplan@haringey.gov.uk)

**By e-mail only**

Dear Sir/Madam,

#### **HIGHGATE NEIGHBOURHOOD FORUM PLAN**

The Highgate Society has the following comments on Traffic and Transport aspects in the HNF Plan:

1. We support the Core Objectives : SO3.1, SO3.2, SO3.3 & SO3.4
2. We support Policies TR1, TR2 & TR3
3. Supporting evidence for the above proposals is provided in Appendix 1 and Appendix 2. The four parking surveys in Appendix 1, carried out by volunteers for the Forum, have been superseded by parking beat surveys carried out by Camden and Haringey Councils in the summer of this year and we request that that data should be used in place of the data provided in Appendix 1. Unfortunately Highgate Hill was not including in these parking beat surveys by either Camden or Islington but this will be rectified shortly so when this additional data is available we would wish to be assured that that data too would be taken into account in the HNF Plan. Further, Islington Council has provided us with parking data for Islington's Zone K which we request should also form part of the formal data to the Plan.
4. We wish it to be noted that the Evidence for parking data for Highgate Hill and the Cromwells goes well beyond providing evidence. It proposes 24 hour, seven days a week CPZ controls in these streets. From clause 3.3.4 it is not clear how the community will be consulted on non-statutory actions within the Plan. We presume that non-statutory actions do not form part of this consultation process.
5. Parking in connection with Whittington Hospital (staff and patients) was the driver for the increased controls due to come into effect shortly in Islington's Zone K which cover Waterlow Road, Despard Road, Lidyard Road and that part of Highgate Hill within Islington. Zone K has 228 parking spaces and, at worst, is at 92% capacity with the existing

controlled hours 8.30am - 7pm weekdays. The proposed change will reduced the parking spaces used to 75% with around 70 vehicles displaced elsewhere. Both Islington and Haringey Councils are looking to find additional on-street parking spaces, including in Cromwell Avenue. We will be discussing with the Hospital and Islington how best to use the expected considerable spare capacity in Zone K for the Hospital.

6. We are having regular meetings with Whittington Hospital. Their own car parks are not fully utilised, particularly at night, though take up in advance of the introduction of the changed hours in Zone K is increasing. We are pressing them to update their Travel Plan 2011 which saw an increase in car usage over their 2003 Travel Plan. Recruitment and retention of staff is key to the delivery of the Hospital's aims and parking availability is seen as being important to achieving it.
7. The northern part of the main Whittington Hospital site was adopted for Housing subject to the needs of the Hospital in Islington's Local Plan adopted in June 2013 Site Allocation ARCH 2. We will be pressing for no reduction in on site parking for staff (particularly needed at night) and car-free housing development. This development forms part of the Hospital's Estates Strategy which is currently moving forward.
8. We are concerned for areas beyond Cromwell Avenue if the parking pressure from within and without Haringey and Camden pushes it into adjacent areas of Highgate as happened when the Highgate CPZ was introduced. We will be seeking to achieve a measured and appropriate response which will not cause inconvenience to residents.
9. The Highgate Society and Better Archway Forum have been in discussion with TfL for about 15 years about extending bus routes which currently terminate at Archway to instead terminate at Whittington Hospital and Upper Holloway Station. In recent weeks these discussions have been very positive. Whittington Hospital is very keen to allow buses to turn in their main entrance, improving patient and staff access to the Hospital. This would also enhance their Travel Plan and reduce pressure on local kerbside parking.

It can therefore be seen that much which may affect residents' ability to park is imminently changing but that we are being pro-active in trying to ensure that a reasonable balance is achieved and that opportunities for improvement are not missed.

We attach the parking beat surveys recently carried out by Haringey and Camden and the Islington survey of February 2015.

Yours faithfully,



Gail Waldman  
Chair, Traffic & Transport Group of The Highgate Society

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