

Another year comes to an end, in which David Richmond's Planning Committee has looked at around 300 planning applications plus at least a couple of hundred applications for tree works. The community is fortunate to have a group with such a wide range of expertise in the full range of issues with which we have to contend, whether planning, law, architecture, heritage, traffic and transport, open space, ecology and all the other necessary skills. It would be invidious to mention individuals, when all have such valuable input into the committee's activities, but a special thanks should go to our secretary, Carolyn Purves, for her efficient production of our minutes, and to Ulysses for lightening the meetings he attends, insisting on a chair round the table, as can be seen in the photograph.

We hope that the very useful *Meeting we held in October* with Haringey's Head of Development Management, Dean Hermitage their Conservation Officer Elisabetta Tonazzi, and Ward Councillors Liz Morris and Bob Hare, will be the first of regular review meetings. We discussed a wide range of issues and concerns:

(1) We were concerned about what we felt was Haringey's incorrect interpretation of legislation regarding *Automatic approval of Certificates of Lawfulness after 4 years, even when use is contrary to planning or Conservation Area (CA) policy*. Official guidance is clear that even this automatic permission is subject to listed building and conservation area controls and building regulations; yet Haringey has been granting Certificates without applying conservation area principles and rules, which was seriously undermining the Conservation Area. Dean said that case law justified their approach, but reminded us that they can take enforcement action beyond the 4-year period, in the event of concealment. Claiming that a development had occurred over 4 years ago was a common ploy; Haringey are alert to this and demand evidence. Importantly, he added that, with current resources, they rely on members of the public notifying them of suspected breaches; 95% of their actions derive from public tip-offs, and it is essential for the Society and the Public to be alert and report any possible infringements. He promised to investigate two cases which particularly worried us.

(2) We also question the processes involved in assessing applications for *Certificates of Lawfulness for proposed works*, which were not put out for public consultation. Dean offered to raise our concerns when he met their Counsel, and invited us to attend.

(3) Another worry was the increase in *Applications for non-material amendments to Planning permissions*; we cited a recent case of a house built higher than permitted and subsequently approved as a non-material change – i.e. there was no need for it to be considered as a new application - despite it being appallingly-designed and clearly a substantial change in the original consent. The decision-making process was obscure, and we believed that there should be wider consultation on whether the change was material. Dena explained that the concept of a was introduced by the Government in 2013, to speed up planning. However, Haringey are alert to the practice of some developers of submitting a series of amendments which, though themselves non-material, would be a material amendment if all submitted at the same time, and this is taken into account. The legislation does not define an NMA and says that it for the Council to decide what is non-material. We cited an example in Shepherds Hill where this nevertheless happened.

Dean emphasised that, though there is no obligation to consult on NMAs, and they therefore have to put a zero consultation period, they appear in the planning lists and, if we react promptly, we can still make comments if we consider an amendment is, in our view, material.

We also cited cases where applications were made for a low number of flats to avoid Community Infrastructure Levy, followed by subsequent applications for more flats which would take incurred the charge if they had been made at the same time. In such cases, we are told, the planners can refuse such applications, particularly if the re was only a short interval between applications.

(4) We flagged up the wider national perception of *a lack of public trust in the pre-application discussion process*, making communities feel 'stitched up' by commitments made by planners prior to public consultation. We appreciate that some developers and architects approach us, saying that Haringey recommended them to do so; but they remain a minority. Dean said that confidentiality is maintained during early phases to *encourage* developers to come and talk to them, citing a local example where the initial proposals were terrible and rejected straight away; we never even see these. The reality was that pre-application discussions were essential because 80% of his department funding came from applicant fees.

(5) *Archaeological coverage of the area remains inadequate*, and in a recent High Street case, the case officer ignored Historic England's advice recommending excavations on a site in the Archaeological Priority Area. We had recently had lengthy correspondence with Haringey and Historic England

regarding developments in Courtenay Avenue, well outside the APA, but worryingly close to the known Mediaeval moated hunting lodge – almost palatial in size – of the Bishop of London’s Park on Highgate Golf Course. This would undoubtedly be surrounded by ancillary buildings and we consider archaeological assessment on these large high-value sites to be essential.

We corrected Haringey’s impression that they could not impose conditions because of cost, which would be far less than they assumed. In any case, the fact that the site was in an APA should be a material factor; all the sites in Highgate Village were small, narrow mediaeval plots, and if this approach were to be taken, then there would be a total loss of all archaeology. What was necessary a limited ground investigation, which could be done quickly and at low cost; if archaeological deposits were identified, the work could be done to an agreed timescale and cost. Developers should be warned that, if no archaeology was planned something was found during construction, the cost implications for the developer could be far more substantial. We gave Haringey an updated map showing known archaeological sites in the area, which showed that the area had high potential. We were encouraged that Historic England agreed with us that archaeological coverage in Highgate, and the size of the Highgate APA, and would work with Haringey to increase both significantly. Dean liked our suggestion of an archaeological workshop for Case Officers, in which we would participate, and undertook to arrange one.

(6) We queried the two-year delay in updating the *List of Locally Important Buildings*, for which we did the work in 2017. We were promised that our proposals would be assessed soon and put out again for consultation, with the aim of having a new Local List in place by April 2020.

In the light of some unfortunate planning and appeal decisions, resulting in the destruction of important local buildings because they were not identified in the *Conservation Area Appraisal* as “positive contributors”, which developers were using as an excuse to demolish. We considered that it needed urgent updating, in the light of continuing development pressures, and offered to do preliminary work to help speed the process.

The other urgent need was for Article 4 Directions. These removed permitted development rights for small works which nevertheless caused cumulative damage to the Conservation Area. Important ones covered such matters as painting brickwork, window alterations and boundary treatments, and could be introduced easily. There was the additional problem that Camden had an A4D in place to prevent change of use from offices to residential on their side of the High Street, but Haringey had none; their side of the High Street needed to be brought into line with the Camden side urgently. DR said that Hampstead had a good Article 4 direction; he would circulate a copy.

(7) *Liaison with Camden*: Despite the presence of a Neighbourhood Plan, and a duty to co-operate, Camden and Haringey were not liaising on Highgate Planning and traffic. A notable example was Camden’s CPZ proposals; though there had been an early preliminary meeting, there had subsequently been no liaison with Haringey, or residents or businesses on the Haringey side who would be badly affected by the proposals.

(8) We raised the issue of an important *Listed Building at Risk in North Road*, which appeared to be falling into disrepair and was now officially designated “at risk”. While the legal position regarding owners’ and residents’ rights was immensely complex, the building now seemed structurally dangerous and Dean would ask their structural surveyors to investigate. Adjoining neighbours were very worried about the threat to their own properties. Haringey would try again to contact the owner.

(10) We raised several individual planning cases. One was the former *Newstead Nursing Home* in Denewood Road to which we had objected long ago but which was undetermined. Haringey explained that they had major concerns about both the inappropriate design of the block, and the number of flats, insisting on more than 9 units for a site of this size. It is hoped that a new, better design, with a larger number of flats, on the same footprint, will be going out to consultation.

We urged the need for much better attention to design in Highgate; the character of some streets in the Conservation Area had been changed out of all recognition by allowing buildings completely out of character with the area and at odds with local policy, particularly Compton & Courtenay Avenues, though other roads, particularly in the Bishops Sub-Area, had also been badly affected. Dean conceded that many should not have been permitted, but felt that there was still much to be saved and urged us to keep objecting to proposals which we consider are harmful to the Conservation Area. He added that one in Compton Avenue to which we had objected strongly, Guildens, had been refused.

We asked why enforcement action had not been taken over *9 Grange Road*, built considerably higher than its permission allowed. We cited a block of flats in Wigan, built 1.5m higher than permitted, which an Inspector ordered to be demolished, which had become a classic and well-known case. Dean said that the criterion had to be: “would it be noticed by a member of the public?”, and Haringey had felt that in this case it would not. However, we were not convinced; the criterion was a dangerous one, as most members of the public would simply assume that what was being built was being done according to the permission. Dean recommended us to keep pressing in such cases, and added that in a recent survey

of use of Enforcement Powers, Haringey had come 5th in London, while Camden were significantly. We also conceded that their enforcement workload in the east of the Borough was huge.

We raised a recent application on an important Listed Building in North Hill, which we had criticised in our objection as an example of a poor application. The Conservation Officer agreed that it was inadequate and was likely to be refused in its current form.

The usual case workload continues and we have sent a number of detailed objections:

We objected to an application at *10 Grange Road* for a "Certificate of lawfulness for existing use of rear garden building as a self-contained residential unit". Originally permitted as a small garden pavilion in 2006, it had by 2019 become a 2 bedroom dwelling occupying a significant portion of the garden at 10 Grange Road. We considered that inadequate evidence had been provided to show that it was substantially complete more than four years ago and that the residential use has been carried on continuously for the previous four years. There is inadequate access for occupants, refuse collection, deliveries or emergency services, since it can only be reached by a door at the side of the main house, giving access to a narrow side path.

Further, as observed at our meeting with Haringey, Lawful development certificates are not relevant where breaches of conservation area control may have occurred. The Neighbourhood Plan specifies that there will be a presumption against the loss of garden land, and Haringey's own Policy DH10 emphasises the importance of back gardens to the townscape and local ecology, the huge development pressure on them, and "a number of recent planning applications resulting in back gardens being threatened by inappropriate development. The Bishop's Area of Highgate has been identified as a particular problem." We therefore objected strongly, and we understand that the application has now been withdrawn.

We wrote to Islington objecting to a retrospective application for grossly insensitive alterations to *90 Highgate Hill*, formerly the Old Crown pub and now the so-named Tourian Lounge, a locally listed building in the Conservation area dating to 1898, a fine example of public house architecture, and (as stated in the application itself) part of a significant grouping of heritage buildings at a focal point up the Hill into Highgate Village....[and] ..."an irreplaceable resource which justifies conservation and enhancement in a manner appropriate to their significance." Yet the works included the obliteration of the original pub interior, which we considered an act of vandalism and asked that its reinstatement be required.

Astonishingly, despite the scale of the work, the application states: "None of the work follows instructions from the tenant on site". We noted that, despite the efforts of the previous tenants to run a successful traditional pub, they were unsuccessful, had welcomed a new tenant who would breathe life into the premises, restore the fabric, and felt that, if well run, it would be join Highgate's other successful pubs. Instead, a landmark building had been turned into an unsuccessful themed restaurant, its terrace covered with a ramshackle plastic-covered structure illuminated at night and dominating views up Highgate Hill, which the new application merely sought to make permanent, with a new illuminated sign and large garish gold letters fixed to the round tower which would cause substantial harm to it the building and to the gateway to the Conservation Area. Thankfully, Islington have refused it and will, we trust, take enforcement action.

A couple of issues back, we reported our complaint about the ghastly red plastic fascia and sign erected without permission by the new Shelter shop at **52 Highgate High Street**. Haringey very correctly ordered them to submit a formal application, and a revised design more in keeping with the Conservation Area, so we were dismayed when all Shelter did was to submit an application to regularise the work already done. We have objected strongly, citing the significant harm it causes and the disastrous precedent it would set if allowed, and copying it to Camden, whose side of the High Street would be equally badly affected. There are many examples of where multiple traders have modify their "house Style" to fit Conservation Areas – the McDonalds in Hampstead High Street is a notable local example – and await Haringey's decision.

We have been strongly critical of an application at **57 North Hill** to waterproof the cellar of this important Listed Building Consent for usable accommodation, which we believe should not have been validated. The heritage statement gives the building date as 1700, and then later as 1810. English Heritage's Listing description states that Nos. 47 to 57 form an early 18th century group and mentions the cellar. While we have no issue with the work in itself, which should not be unduly complicated, there is minimal information on how it is to be implemented. There are other concerns: trial pits may have been dug without the appropriate Listed Building consent; there is no section drawing, no plan showing how drainage is to be achieved or how the dividing walls will be dealt with; and no drawing showing the existing and proposed depth of the current and deepened cellars.

It states that the existing floor was replaced with a concrete slab, but does not explain whether this is known for a fact, or whether the previous floor was simply screeded over. If an original 18th

century (or earlier) floor still survives, the proposed works would cause unacceptable damage to the historic fabric, and there is no assessment of whether the lowering of the floor level would earlier surviving basement surfaces. Basically, there appear to be no drawings showing what is proposed: simply the five pages of site photographs with no apparent relevance to the works. We have also requested an archaeological condition to ensure the recording of any structural remains or archaeological deposits likely to be lost in the works. In summary, proper drawings and method statements must be provided before the application is considered further.

We have objected to a revised application for a two-storey extension at **98 Talbot Road**, following refusal of the previous one. The Design Statement asserts that “There appears to be no planning history”, which is rather surprising given that their previous application was refused only recently. Though smaller in scale, it remains a significant extension and will still cause light pollution to the houses it overlooks. There is also no Basement Impact Assessment. The proposed basement will split the garden into two small areas, and is contrary to the Neighbourhood Plan’s requirement for not building on gardens. It would adversely affect the flow of water to the garden and increase run-off down to adjacent properties. Yet the drawings lack any section showing the depth and extent of the basement.

The proposed extension would also increase the bulk of the building in comparison to other Edwardian houses in the street, thereby causing harm to the Conservation Area and setting an undesirable precedent for other residential properties in the area. The applicants’ statement that what is effectively a pastiche of the original style “will bring the appearance back to better resemble the original building and will improve the street scene” is clearly untenable and is in our view indicative of the careless manner in which the design and conservation area aspects have been addressed. We also take exception to the description of the area as “a disused parcel of brownfield land that can be redeveloped to the benefit of the neighbourhood and add value to the local character of the neighbourhood.” It is a garden space which has been allowed to deteriorate, and restoring it as a garden for the multiple units in the building will add more value to the neighbourhood and the character of the area. It would constitute Backland Development, contrary to policy. We also understand that the site is infested with Japanese Knotweed, a notifiable pest plant which can cause extensive structural damage; landowners are under a legal obligation to prevent its spread and are liable for damage caused if it does.

We also took issue with the applicants’ Heritage Statement. While conceding that it is within the Conservation Area, it seeks to justify the work by stating that “There are no buildings of great historic significance in the immediate area”. This is irrelevant; the Talbot Road area was included in the Conservation Area as part of Highgate’s Edwardian expansion, and contained many unspoilt buildings of that period which reinforce the architectural character of Highgate, and cramming more onto their sites, in pastiche period style, should be resisted. The application also includes the completely irrelevant information that that “There are no listed buildings in Talbot Road but there are many listed buildings along North Hill”, together with a detailed schedule of them. The two roads are completely different; North Hill is an ancient road with buildings illustrating 400 years of Highgate’s history. Talbot Road is part of Highgate’s Edwardian heritage.

We have supported the Conservation officer’s objections to proposals for **3 Shepherds Hill**, which ignores local policy that rear extensions must be subordinate to the main building, and proposes front lightwells and rooflights not in keeping with, or complementary to, the existing property, would fail to preserve or enhance the character and appearance of the Conservation Area and significantly alter the existing proportions and scale of the existing building and therefore should be refused.

We objected to proposals for a fourth floor extension to **4 North Grove**, part of a distinctive modern terrace of 3-storey houses. The existing symmetry of the terrace would be lost and it would set a dangerous precedent for all the houses in the terrace to build 4 disparate floors; Haringey agreed and have refused it.

We also objected to proposals for a large forward extension and new gated boundary treatment at **44 Bancroft Avenue**, well outside the Conservation Area but within the Neighbourhood Forum, which we believed would set an unacceptable and harmful precedent for the area. We also expressed the view that that the disclaimers as to accuracy of measurements stated on the application drawings were completely unacceptable; plans must surely be sufficiently accurate to enable the application to be properly assessed. While the extension was, unfortunately, permitted, the proposals for the revised boundary treatment were withdrawn, which must be counted a partial success.

We were, however, dismayed at the granting of permission to fill in the historic 18th century double-pile roof at **29 North Road**, one of a pair of unspoilt historic cottages, to provide a bathroom. While

appreciating the need for the facility, we believed the proposals were inappropriate and will be difficult to implement without damaging the building's historic integrity.

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With help from Councillor Morris, we have succeeded in persuading Haringey that the pavement outside Highpoint was not the best place for installing **Electric Vehicle Charging Points**. However, in their response they avoid the subject of where charging points are most needed in Highgate, and are somewhat inconsistent in saying that they thought the best position was outside Highpoint, while noting that the highest number of requests has been from the Cholmeley Park area - which we would support, as we would the provision of more electrical charging points to help address London's air quality crisis, in the right places.

They advise that they have signed contracts with various EV charging points providers, which will give a wider choice of designs, and are working with TfL to roll these out in the borough. As we requested, they are considering various types of charging points, such as lamp columns, rapid charging points etc. which will be operated by various EV point providers including BluePoint London/Source London, who have plans to expand their network in the borough and are looking at locations in Highgate area, based on requests. Char.gy Ltd are assessing which lamp columns would be suitable, as the system only works on certain types. TfL have plans to install 5 rapid-charging points in the borough this year.

In what we hope will become a regular initiative, we were visited by a class of students from **Channing School**, who came to find out what the Society did in terms of town planning and community initiatives. They found it very informative and we found the insight into younger people's interest in community action to be useful and encouraging.

Thanks to Camden and Thames Water for restoring the historic **Listed railings round the West Hill Reservoir**, which had suffered damage when a tree from The Grove fell on them earlier in the Year.

**The Boundary Commission** has recommended dividing Highgate and Dartmouth Park into separate wards. The downside is that we would be reduced to one Ward Councillor in the Highgate Camden Ward, which must have serious implications for local democracy. However, since the draconian new CPZ rules Camden have been proposing for Highgate Village were predicated on a vote mainly from the Dartmouth Park area, the reason for any changes, other than minor adjustments where needed, would become invalid. What do Society members think?

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A welcome item in the *Times* for September 28 -reported that a house owner at Sandbanks, Dorset, was fined £2,700 for cutting back two trees blocking sun light from his home without permission, plus £15,500 court costs and, under new legislation, and an additional £40,500 being the increased value of his house by his actions.

After long efforts, we succeeded in meeting with Thames Water's Ecologist at the **West Hill Reservoir** to discuss a more ecologically-sensitive ecological management scheme of the former Highgate Green area below the reservoir, to make it a more effective stepping-stone in the local ecological corridor between Hampstead Heath and Highgate and Queen's Woods. His reactions were enthusiastic, and for the first year it is proposed that the vegetation be allowed to grow so that the flora can be surveyed and understood, and mowed on a rotational basis to ensure that the site's insect fauna can flourish. A small number of native trees and shrubs will be planted to increase the biodiversity, but the aim will be to promote a meadow flora.

Haringey have announced that they will be cutting back on **Street Tree planting** except in open space and tree deprived areas in the east of the Borough, and that no replacement tree planting is envisaged in areas like Highgate. In some streets, households are already clubbing together to arrange planting of new trees, which they will pay the Harington Scheme to provide and plant, giving a double benefit. As this will unfortunately be the situation for the near future, please contact our Infrastructure Group if you are interested in setting up a scheme in your street.

**Don't pin or nail notices to trees!** We pointed this out politely to a local group, who responded, apologising and adding that they were unaware that it was damaging to the tree's health. They assured us that they will in future attach anything with string or sticky tape. Please make sure that you do likewise.

Our tree expert has looked at several hundred tree applications during the year. The task is made more difficult by the often abysmal standard of applications for permission to do tree works, with minimal

information, seemingly minimal understanding of trees, and hopelessly inadequate sketch maps which the proverbial five-year-old could undoubtedly do better. He have asked Haringey if they could consider asking applicants to submit proper scale drawings, showing the approximate true size of house and garden, location of tree and where the road is, and – particularly important - a photograph of the tree, so the appropriateness of the treatment can actually be assessed? It is often impossible to judge whether work proposed is appropriate, and whether the tree might deserve a TPO, particularly when the tree is in a back garden and not visible from the street.

On September 11 we attended a very successful reception hosted by the Heath and Hampstead Society on the Parliament Hill Cricket Ground to celebrate the 30th anniversary of the City of London's custodianship of the Heath. The opportunity was also taken to pay tribute to the Heath rangers, ecologists, constabulary, lifeguards, and other dedicated staff who keep the Heath a special place, come rain or shine; some have been there for over 30 years. Society Chair Marc Hutchinson highlighted the close cooperation between the City, the Society and the Consultative Committee (on which the Highgate Society sits) over the last 30 years,

He highlighted three major incidents in recent years: First, working with Camden and the Highgate and Heath and Hampstead Societies, the City managed, in a fight which lasted *18 years*, to save Athlone House from demolition, and how gratifying it has been to see its current restoration.

Second, in 1993 with the Vale of Health Society, they persuaded the City effectively to assert their rights to the Heath's common land under the Commons Registration Act to prevent the construction of a new road across part of the Heath to a property at the Vale of Health, whose claimed a personal right-of-way across the Heath after 20 years of use. The Greater London Council, the previous owner of the Heath, consistently failed to assert those rights during the owner's claimed 20 years; the City did so and, prevented the building of the road.

Third, they worked with the City to bring sheep back onto the Heath this year after an absence of sixty years to demonstrate, among other things, the ecological benefits of grazing on the Heath. It created an extraordinary level of media and public interest and will hopefully be repeated next year.

The joint endeavours extend to the *fringes* of the Heath. The City and the Society are, in some cases with the Highgate Society and the Vale of Health Society, working together to prevent inappropriate development on five sites on the Heath fringes. London is fortunate to have the City as the Heath's guardian.

The Chair of the Management Committee, Karina Dostalova, praised the Heath's staff and the huge amount of skilled work which goes into keeping it, as originally intended, in its wild and natural condition, and keep the Heath the best green space in the country.

English Heritage have confirmed that they will not proceed with proposals for a **Humanitarian Workers Monument** on the Stable Field at Kenwood, against which we and the rest of the Consultative Committee had objected, and were considering alternative sites within the estate.

**Irresponsible dog owners on the Heath** have resulted in the death of at least one cygnet.

The job of new **head gardener at Kenwood** has been offered to a candidate. English Heritage's resources, however, are much less than the City's, and their team of 4 faced a challenge in maintaining the estate., perhaps one of the largest attached to an English Heritage property.

An appeal against refusal to allow an illegally-built cottage to remain on the **Vale of Health land South Fairground** was fought successfully by the City and the Heath and Hampstead Society. A further similar appeal on the **North Fairground** is yet to be heard.

**Robberies on the Heath** RV said he was shocked that a friend of his visiting had been attacked by eight The **Sheep Grazing Trial** on the Tumulus was a huge success, with up to 2,000 visitors. 95% of public reactions were strongly positive; they felt that it creates a wild and rural feel in London; was therapeutic and calming; was good for biodiversity; was educational, especially for urban children; and was a good alternative to machine mowing. The few negative responses were about closing off parts of "our Heath", reducing the freedom to walk dogs off leads (though other dog-walkers had no problem), over-grazing by sheep, implicitly advocating killing and eating animals by showcasing livestock, and turning the Heath into a "theme park". Most hoped that it would be repeated, and even extended.

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**Thames Water** warn that, after almost three years of dry autumn and winters, groundwater levels have now reached drought zone 3 in its central region, and that, though rainfall in August was below the long-term average at 77% and was slightly above average in July, at 104%, a couple of months of good rain in the summer months, is not enough to compensate. Sustained above-average rainfall is needed during the autumn and winter to recover, and if rainfall remains below average, they will consider restrictions on water use in spring 2020. If the low rainfall trend continues and more reservoirs are not built, there might even have to be phasing of new development in London, and extracting water coming into London in the canal system from areas with higher rainfall.

The issue of **Business Rates** remains contentious. One London organisation wrote to its members: “[You] may recall that in October 2016, [we] received an almost 400% increase in [our] rateable value, to be phased in over five years... We are currently appealing, *but the delay in announcing the appeals mechanism and the backlog of appeals from the last re-rating in 2010* suggest that any appeal may not be settled for five years or more”. [my italics]. How can businesses plan on this basis? It is an indictment of the business rates system, and surely a major systemic failure and brake on business.

We await the next phase of the Government’s assault on our planning system with the anticipated **Accelerated Planning Paper**. The focus will be on planning departments’ capacity and the “success” of measures already taken. There are concerns that there will be a requirement to cut planning conditions by 30%. The aim is to give developers “certainty”, and resources may be directed to providing more design staff. There does, however, seem to be a vague interest at some levels in Heritage, and Historic England are emphasising the links between conservation and good design and training planning officers, since Planning education currently marginalises Conservation and Heritage.

The new Heritage Minister [at the time of writing!]. Robert Jenrick, has at least shown interest in heritage, and wants to understand how the widening of Permitted Development can damage heritage, and where it is not working. He is also interested in improving the Listing system. He has also shown interest in the issue of Embodied Energy in demolished building. This is something which we and others have urged for a long time to be a factor in assessing applications for demolition of perfectly usable buildings, and the environmental disadvantages of demolition rather than refurbishment, but Government find it too complicated to consider.

Government are persisting with their idea to allow people to **Build Upwards without planning permission**. Conservation Areas will be exempt, but other areas will be hit hard by thoughtless and, all too often, “cowboy” development on buildings not intended to take more superstructure. Homeowners will be able to add two floors to their home, and if the building meets building regulations, neighbours will have no right to object. While purportedly to increase the housing supply, it relates only to existing houses and will simply result in an increase in larger, more expensive houses, rather than the new affordable housing needed; critics say 3 million social homes are needed in the next 20 years. Councils will still have powers to limit building on criteria including how they fit into the local aesthetic, but the exact ability is as yet unclear. The Housing Secretary calls the plans “bold changes to the planning process” which “will make a real difference to people up and down the nation.” It certainly will, especially to neighbours. He continued: “All too often the planning system proves complicated, outdated and bureaucratic and is too complex and costly for people and small businesses to navigate” – not surprising, considering that the current planning system has been reduced to chaos by incoherent government meddling with it. His confidence that it will “speed up and simplify the process, while ensuring that communities still retain a say over their future” does not convince many, and it remains unclear how weakening legislation on detached homes will help tackle the housing crisis.

The rather toe-curlingly-named ‘**Building Better, Building Beautiful**’ initiative will not solve the problem of bad development, as long as the communities affected continue to be denied a say in what is built where. If a developer ticks all the Design Guidance boxes, but doesn’t meet local need, fitness for purpose, or being in the right place, there will still be a presumption that his development should be allowed. It is also unfortunate that the guidance regards Heritage simply as old buildings because “they have gothic trefoils and old capitals” (sic). It looks only at “beauty”, and fails to see Heritage for its wider value in regeneration, its historic value, etc. It doesn’t even define ‘beauty’ and actually says “Beauty is like love”...

**The Chartered Institute for Archaeologists** have published a report showing how recent planning changes have affected archaeology, particularly permitted development. They found that, in 50% of cases where redevelopment occurred on sites where nothing was previously known about the archaeology, something was found. This is particularly alarming in the light of our vain efforts to persuade our local authorities to place archaeological conditions on developments where we feel certain that there would be remains present.

Much has been made of the Government's initiatives to encourage the recovery of declining **High Streets**. I raised with Historic England my concern that it is all rather pointless in the face of widening permitted development which removes the ability of local authorities and communities to control what happens in High Streets; they responded that they had made this very point to Government.

At a recent meeting I attended, someone asked what the **London National Park City** designation actually meant. No-one seemed to know.