

# Highgate Society Response to the Draft Haringey Local Plan

## January 2026

*Note to Haringey Council that text in red denotes suggested additional text.*

### **Part 1: Place Making for Haringey**

#### **Chapter 1**

*1.05 A New Local Plan is needed to ensure the Council has an ambitious, up-to-date and **sound robust** Local Plan that incorporates our communities' overall aspirations for the borough. The main reasons for developing the Local Plan now are to:*

*“Sound” is the more technical term.*

*Also economic growth and prosperity, particularly innovation and development, should be given strategic emphasis (and included in the list below 1.05).*

#### **Pg 8 Haringey Placemaking Framework Diagram**

*Surely a “thriving economy”. Or a “resilient economy” which is the wording used elsewhere in the Plan. Otherwise allow enough space on the diagram for “Resilient and Inclusive Economy”.*

#### **Chapter 5**

*5.75 To ensure placemaking responds to a changing environment, developers should seek feedback on how the operation and management of completed developments could be improved to maximise their positive contribution to the local area and address any adverse impacts.*

*This is positive does will the council monitor this otherwise it will not happen?*

#### **Figure 04 | Spatial Strategy Policy Map**

- The map itself is so faded it is difficult to work out the different areas of Haringey
- Are there any Placemaking Focus Areas?

#### **Chapter 6**

*6.19 & 6.20 have been repeated*

### **Part 2: Neighbourhood Policies**

#### **Chapter 16: Highgate Neighbourhood**

##### **Your Neighbourhood - Highgate**

The policy is underlined by the requirement to create 400 new homes. As Highgate is heavily developed, it is difficult to see how this can be achieved without loss of suitable employment or degrading the public realm.

Although the introduction to this section commits to improving walking and cycling facilities, there is nothing about improving the bus services. Particular problems the Society has identified are the provision of east west bus services between Hampstead and Highgate and between Highgate and east of the borough and the bus service on Archway Road which has deteriorated considerably since the recent changes made by

TfL. The Society believes that public transport should always take priority over cycling. 94% of the population use public transport over 4.5% cycling. Bus services are often the chosen method of transport due to mobility problems of users and cost. Whilst it is recognised that much of the provision for public transport is under TfL jurisdiction, Haringey should be strongly supporting its community by lobbying for better public transport services particularly if it is going to wean people off their cars.

## **Site Allocations**

### **HGSA01 Highgate Yards**

30 homes, 924sqm Class E (GIA)

The commitment to sensitive and limited development in the area, as well as the protection of the green Bowl area is welcomed and recognises the historical importance of this part of Highgate. However, what is missing is any indication of a masterplan for the area. This is pertinent bearing in mind the recent Townsend Yard Development, which was approved on a piece meal basis without any assessment of the impact on the designated heritage assets adjoining the site and the potential for development on adjoining sites, in particular Broadbent Yard.

With the undertaking to provide 30 new homes and 924sqm class E, it is difficult to see how this can be achieved. The commitment to employment use can only be achieved by radically raising the height of the development. The impact of anything much higher than the existing buildings will damage the setting of the numerous listed buildings surrounding the site and as such could be deemed a breach of the NPPF

This site is adjacent to site of considerable ecological significance and any future development has the potential to provide considerable ecological gains including a wildlife corridor link.

### **HGSA02 Highgate School**

This is currently an active planning application and therefore the Society will be commenting on the application rather than the plan.

### **HGSA3 460-470 Archway Road**

130 homes, 1,260sqm Class E (GIA)

This site is currently a builder's yard and was included in the last Local Plan. At that stage, two concerns about the feasibility of the development were raised. The first is poor accessibility to the site. The alternatives are off the merged traffic of the gyratory, the second being by the bridge on Woodside Avenue. Also it was understood that TfL were extremely concerned about the security of the underground system as there was a control centre on adjoining land. It is not known whether that is still the case.

It is assumed that, given the undertaking that there will be no compulsory purchase, this development is dependent on the owner's willingness to sell the site which has not been forthcoming at this stage.

Much of description of the development in the proposal is on the pedestrian experience on Archway Road. This site fronts the Wellington Gyratory, one of the busiest intersections in north London. There is no mention of what impact any development will have on traffic flow and TfL's approach to this junction. TfL currently appear to be resistant to any alterations due to potential impact on the already heavily congested stretch of road.

The PTAL for the site is 3 and a car free agreement is proposed. Bearing in mind the difficulties of accessing public transport from this site (lack of crossing and heavy traffic etc.), this could render the site unattractive for any developer.

Although the draft plan states that the “*development proposals should protect and enhance the nature conservation value of the site and should not encroach onto the adjacent MOL*” there is nothing specific about the views out of Highgate Woods. We feel this section of the plan needs strengthening with the inclusion of a statement that no buildings in this development should be higher than the tree canopy of Highgate Wood so that they will not be visible from the very special view from the Highgate Woods cricket pitch.

The draft plan mentions an active frontage onto Archway Road. It is assumed this will be retail units of some sort but it is difficult to see how this will be viable bearing in mind the problems sustained by shops at the northern end of Archway Road and Aylmer Parade. In addition there are houses on the opposite side of the road which currently have an open aspect across Archway Road. Any building on the back of the pavement line will create a canyon like effect on this narrow stretch of very busy road. This will substantially increase noise and air pollution which would result in a worsening of the living conditions for these residents.

Finally the builder’s yard provides valuable blue collar employment , but the nature of the activity is essentially low density. Although, the allocation gives an undertaking to create employment this is likely to be of a very different nature being an element of high density residential scheme.

#### **HGSA04 Wellington Roundabout**

Class E and 50 homes

The Society has been consistently opposed to the housing development on this site on the basis of impact on neighbours, poor amenity for residents (particularly with noise and air pollution) and lack of access across the busy road junction. It is disappointed by the recent decision by Haringey Council to award themselves planning approval.

The proposals also seem to indicate the loss of the service station. This is a well-used and vital facility, providing not just diesel and petrol but also fast charging for EV’s. There have been an enormous number of closures in North London recently, and apart from the small and limited service station in Highgate Village, there will be no petrol stations within the area. A recent survey related to the potential closure of a station in Finchley Road indicated that vehicles would need to travel many miles to fill up and the scheme was abandoned.

#### **HGSA05 Land adjacent to 27 Aylmer Road**

70 residential units

This appears to be a site which has potential for development and it was supported by the Society in the current Local and Neighbourhood Plans. It is understood that the land is owned by Thames Water and could be available for development,

The likely issues which will require consideration are:

- Impact on any wildlife and biodiversity on the site

- Flooding
- Objections from the adjacent Highgate Golf Course and allotments

### **HGSA06 Former Highgate Railway Station**

Education/Class E

The major issue is that the “red line” around the site needs corrected to show that the strip extending over Shepherd Hill refers to the tunnel and not to anything above ground level. This caused some alarm amongst the allotment holders.

Apart from this, the Society supports the usage proposed for this site but suggests the addition of community use. It is recognised that the challenge that any development will present is the funding of any works.

### **HGSA07 Gonnerman's Antiques, 408-410 Archway Road**

35 new homes, 300m2 class E

The Society does not support this scale of development in this location. 35 new homes will require a high density scheme built to the back of the pavement line which will destroy the existing mini park which does much to alleviate the hostile environment in this location, which together with the existing 4 storey houses opposite will create a canyon like effect exacerbating existing adverse conditions.

This site forms a corner of one of the most intensely used pedestrian hubs within the area forming a junction of 5 roads plus the access road to the underground. The pollution readings for this junction are the highest in the area (see Highgate Neighbourhood Plan) and to build further housing in this area is irresponsible for the future residents, the existing residents of both Goldsmith's Court and Archway Road opposite, and the large number of pedestrians circulating in this area.

In addition it is understood that the owner of the antique shop, Gonnerman's was not consulted about the inclusion of his property as a site allocation and is not prepared to sell his property.

This is an ideal site for Placemaking rather than for housing and Haringey should look at enhancing the area rather than cramming more units on an unsuitable site.

The Society would also like to support the comments made in a separate submission by the Archway Road Action Group (ARAG).

### **HGSA08 40 Muswell Hill Road**

45 homes, 784 sqm Class E (GIA)

As with HGSA03 this site provides valuable blue collar employment, and being a builder's yard is essentially low density. Although the allocation gives an undertaking to create employment, this is likely to be of a very different nature forming an element of high density residential scheme

This site is sandwiched between Highgate and Queens Woods which are of huge ecological significance and any future development has the potential to provide considerable ecological gains including a wildlife corridor link between the two woods.

### **HGSA09 Former Mary Fielding Guild Care Home**

50 bed care home plus 9 residential units

The Society does not propose to comment on this as planning approval has been granted.

## **HGSA10 Hillcrest Estate**

35 new homes

The proposal is to provide new homes through “*appropriate infill development. Play and landscaping improvements should be delivered as part of proposals in consultation with the existing community*”.

Hillcrest is a well-regarded estate designed mid-20<sup>th</sup> Century by TP Bennet.

This is a scheme which has been previously proposed and the locations of the new development was on existing landscaped and play areas. As much of the perimeter of the site is classified as SiNC these are the only locations for infill and it is assumed any development will involve similar infill. This drew extensive opposition from the residents and the Society, and was therefore abandoned. It is regrettable that similar proposals are now being submitted again.

## **HGSA11 Former Newstead Nursing Home**

The Society does not propose to comment on this as planning approval based on the proposed development opportunities has been granted.

## **HG SA12 44-46 Hampstead Lane**

The Society does not propose to comment on this as planning approval based on the proposed development opportunities has been granted.

## **Part 3: Boroughwide Policies**

### **Chapter 18: Design**

#### **Introduction**

18.03 Good design requires a holistic approach that balances social, economic and environmental factors, including fostering nature recovery and taking a conservation-led approach to placemaking. It is a deliberate and iterative process that requires research, consultation, **including with the local community who, with their detailed local knowledge, can often be of material help in formulating proposals which will receive local support**, and creativity to identify and achieve the outcomes that best meet the needs of the community.

#### **Policy D1: Haringey Design Principles**

**A. All proposals must achieve good design and contribute to the distinctive character and amenity of the local area. The Council will support proposals developed through a design led approach which are consistent with the following design principles:**

Please add an additional point

**(9) can demonstrate compliance with the requirement in para. 137 of the National Planning Policy Framework that there has been meaningful consultation with the local community.**

#### **Policy D2: Design-led Approach and Delivering Design Quality**

**A. Proposals should provide a clear design vision and establish appropriate site-based design parameters to implement it, having regard to:**

**(5) feedback from residents and other stakeholders via engagement and consultation**

We strongly support this and suggest that it be made clear here that Haringey can provide contact details for relevant local groups.

**A. All new development must contribute positively to the distinctive existing and emerging character, context, and amenity of the local area. The Council will support proposals which respond positively to:**

**(2) The urban character of the site and its surrounds, having regard to:**

Please add

**(g) its relation to public realm** ~~Active, lively frontages to the public realm;~~

The current wording is imprecise, and not necessarily always appropriate

Please add an additional point H.

**H. Where it is clear that consultation with the local community has not resulted in their concerns being addressed, the Council will, where appropriate, initiate a Development Management Forum at which unresolved matters of fundamental importance can be discussed, and adjudicated by the Council.**

Furthermore, in relation to Policy D2 C Sections 2 (f) and 1 (g) which deal with landscaped boundaries and treatment. The Society would like to see this policy coordinated with the Site Allocations set down in Chapter 16, Highgate. Currently they appear to contradict one another. Within Highgate there are 3 sites allocated for housing, namely HG.SA03 460-470 Archway Road, HG.SA05 Land adjacent to 27 Aylmer Road and HG.SA07 Gonnerman's Antiques. All these proposals are for housing/mixed use facing directly onto the A1 major roadway with the boundary line carried to the back of pavement line with, in the case of SA03 and SA05 an active street frontage required, The number of housing units proposed suggest that these could be at least 3 storeys built to the back of pavement line. The Society has commented on this in their response to Chapter 16 as also has the Archway Road Action Group. These sites face onto existing 3 and 4 storey houses, flats and shops on the other side of the road which is quite narrow here. The Society's concern is that building in this form will create a canyon like effect on these narrow sections of the road causing unacceptable noise and air pollution not only for existing and proposed residents but also any pedestrians using this stretch of road. The junction adjacent to Gonnerman's antiques is at the junction of 5 roads and the access ramp to the underground and is thus is one of the most heavily used pedestrian areas in Highgate.

The Society would like to see the inclusion of at least a 3m wide landscaped buffer zone between the rear of pavement line and any buildings. This should consist of trees and other landscaping which will effectively screen noise pollution and absorb airborne pollutants, and should also be designed to be effective all year round. It should be noted In the case of the Gonnerman's Antiques site that the proposals involve the removal of an existing planted area facing onto the road and no indication of replacement.

*18.24 The starting point for a design-led approach is undertaking a thorough site appraisal (sometimes known as a site analysis) which surveys and evaluates the existing characteristics*

of a site/ building and its surroundings. Analysis should be undertaken having regard to planning policies, guidance and design guides and/or code. **Early consultation with the local community, preferably at the design stage, is strongly recommended. Consensus at this stage can speed the planning process significantly by enabling a proposal to go forward for approval without any opposition.**

18.29 Compliance with each component of the design-led approach should be set out in the Design & Access Statement. Design & Access Statements should be supported by clear drawings and images. 3D visualisations are encouraged for minor development proposals and are required for major development proposals. Drawings and images must include the immediate surrounding context so that proposals can be clearly understood in context. **The Design and Access Statement should also set out how, and whether, there has been community engagement in the formulation of the design, and the outcome of such engagement.**

Please add an additional point

**18.39. In the event that permission is granted, the applicant will be expected to take photographs of the immediate public realm (i.e. trees, paving stones, street furniture) before the commencement of works, and to make good, or pay for the making good of, any damage resulting from the works.**

This could also be included after the section on “Managing Impacts of Construction” (18.169), or within policy D.4 Public Realm and added as Point E.

### **Policy D3: Inclusive Design**

18.10 *The best way to achieve inclusive design is to involve as many people as possible in the design process. The Council expects applicants to demonstrate that they have taken a proactive and meaningful approach to engaging with potential users or user groups, existing residents, neighbourhood forums, adjacent landowners, community groups and other local stakeholders to ensure that proposals respond appropriately to local needs and are informed by lived experience so that proposals create places that are welcoming and inclusive for all. In particular, the Council expects applicants to demonstrate how they have proactively engaged with seldom heard groups, including women and girls and gender diverse people. The Council’s Statement of Community Involvement contains more detail on engagement expectations.*

We strongly support this. If para. 137 of the NPPF is retained in the revised version, it should be specifically referred to as a requirement. It should be emphasised, here or elsewhere where appropriate, that local community groups possess detailed knowledge of local character heritage, archaeology, and other aspects such as biodiversity and geology, and often include people with relevant professional skills. Timely engagement can therefore save the applicant significant time and expense.

### **Policy D5: Active Street Frontages and Shopfronts**

- A. Within designated centres in the Town Centres Network and on identified high streets, proposals must support a vibrant, visually engaging streetscape and public realm including:**

Clarity is needed on what is an identified high street. i.e. are Archway Road and Highgate High Street identified high streets.

#### **D. For Residential Streets**

Please add 3 additional points.

**(5) Materials for boundary treatments should reflect those already present nearby, if of heritage value;**

**(6) Boundary treatments which create a sense of exclusion or enclosure will not normally be permitted, especially where the main character is of open, green front gardens. Where security is a demonstrable issue, this should be addressed through measures within, or immediately around, the building itself.**

**(7) The replacement of soft landscaping in front gardens with hard standing will not normally be permitted. Where it is permitted, the surfacing must be of permeable materials, to prevent run-off and water deprivation of trees.**

**(8) original boundary treatments such as clinker walls should be maintained including those under 1m high**

#### **F. Shopfront signage should:**

Add an additional point.

**(7) Internally illuminated facias or signage will not be permitted in Conservation Areas**

18.93 Generally, shop fronts should *reflect the historic character of their setting be of a traditional design, unless it can be demonstrated that an innovative high-quality contemporary design will better contribute to the character of the streetscape.*

This would give more flexibility to allow a well-designed modern shopfront to add its own element to the parade where it is considered that this could be done without harm to its historic character.

#### **Policy D6: Artificial Lighting and Managing Noise Pollution**

**A. Development proposals must mitigate and manage light pollution by ensuring that lighting is designed to minimise and control the level of illumination, glare, angle and spillage of light, particularly to protect sensitive receptors such as homes properties and natural habitats. Areas which are naturally dark or unlit at night – particularly aggregate areas of back gardens valued by householders as “dark areas” – are valuable nocturnal wildlife habitats, as well as amenities for residents, and permanent lighting will not normally be permitted in these areas.**

Alternatively this could be added to 18.97

The Society would like to see this policy expanded to include air pollution, not just that arising from inside a development but dealing with that arising outside a development such as traffic generated air pollution. Many of the site allocations are adjacent to major roads where they present great challenges in dealing with poor air quality which will affect the health of the occupants. The design section of the Plan is entirely silent on air pollution except for one mention in connection with weathering of buildings.

Measures for dealing with air pollution, should be required in the same way as noise pollution. These are an essential part of the outline design stage and not a later add on and should treated as such. The configuration of the layout and the measures to combat air pollution should be submitted as part of any design stage and should be such that the occupants have access to clean air. Although filtering of particulates is possible, this does not deal with NO2 .

### **Supporting Text - Managing noise pollution**

We suggest that a clause be added specifying acceptable sound levels for installations in residential areas, back gardens, etc.

### **Policy D10: Tall and Mid-Rise Buildings**

The Society generally welcomes this policy particularly the protections of amenity and infrastructure associated with high rise building but the following concerns remain:

The first is the creation of a mid-rise category of buildings which covers buildings over 18m or 6 storeys, with high rise described as above 30m or 10 storeys. This splitting into mid and high rise also contradicts the London Plan which refers under Policy 7.7 as tall buildings being those generally substantially taller than their surroundings, and over 18m or 6 storeys. The draft Plan indicates the sites suitable for high rise which are generally in the east of the borough and therefore would not impact on the Highgate area. However, the draft Plan is silent on sites suitable for mid-rise and the concern is that future development in Highgate and elsewhere could be uncontrolled mid-rise with a damaging impact on its heritage and open spaces. This would be in breach of the London Plan and the Society would like to see policy D10 align with this.

In addition, the mid-rise term does not correspond with the Building Regulations description of a High Risk Building (HRB) which includes any building over 18m or 7 storeys. The design of HRB's is considerably more onerous than a lower building and will concern issues covered in planning such as number of staircase and lifts, layout and materiality. This has the potential to create a confusing situation where mid-range buildings are approved at planning stage only to prove unbuildable at building regulations stage. The Society would like to see Haringey align with the London Plan and the Building Regulations in its definition of what is a High Rise Building and raise awareness of the current requirements for HRB's.

A further concern is that even mid-rise buildings can have a considerable impact on open spaces including parks and woodland with resulting in a considerable loss of amenity due to the destruction of the unspoilt rural views. In the case of Highgate, the SA03 development has the potential to impinge on unspoilt views from the cricket ground of Highgate Wood by rising above the canopy line. It is felt that the inclusion of a specific clause protecting the outlook from within parks and open spaces should also be included to prevent the urbanising of these spaces and to preserve their amenity value in accordance with policies elsewhere in the Plan.

### **Policy D11: Quality Housing.**

We wish to observe that the use of the phrase 'High Quality Design' is, in the community's experience, a criterion on which the community itself is never consulted. Certainly, in 60 years' experience of engagement with the planning system, the Society has never encountered an application which does not consider its proposals of 'high quality' and has gathered 'evidence' from a plethora of 'experts', and examples often from well beyond the area, to substantiate this assertion. Yet the same experience has

repeatedly demonstrated that too much development which has been permitted has been of very low design quality, and that the views of Conservation Officers and Quality Review Panels routinely outweigh the considered comments of local groups without giving them any opportunity to defend their case.

It must be made clear to applicants that the community's views of Design in particular cases will be given material consideration, and that they will therefore be expected to engage in meaningful community consultation to achieve the best possible design outcomes. Communities do not object to development; they object to bad development.

#### **Policy D14: Basements**

Generally these policies are more detailed than DM18, which the Society welcomes.

##### **A: The Council will only grant permission for only support basement development where it is demonstrated that the proposal would not cause unacceptable harm to:**

The previous DM18A said: "*Householder extensions to existing basements, and the construction of new basements, including in existing dwellings will only be permitted where it can be demonstrated that the proposal.....:*"

To maintain the strength of the policy "*will only grant permission for*" wording must be kept.

##### **A(1): the stability or bearing capacity of the site and adjacent land, including buildings, infrastructure, and trees;**

The Society welcomes this.

##### **A(5): biodiversity values, taking account of the need to maintain adequate soil depth for preservation of landscaping consistent with neighbouring properties; or**

##### **A(6): the significance of heritage assets.**

The Society welcomes the extension of DM18 provisions relating to trees and soil depth to now cover any basement involving groundwater diversion - as this was only where basements extended beneath gardens in the previous policy

We are disappointed that the DH7 requirement for 1m depth of permeable soil above basements beneath gardens has not been included and urge the Council to include this.

##### **B. Basement development of existing homes and new builds must:**

- "New builds" MUST be included too - as discussed at the Highgate de briefing session with Helen Evans at Jacksons Lane on 15th December.
- Points (1) – (9) are a welcome improvement from the previous policy.
- B.(3), (5) and (6) – the Society believes that, to avoid adverse impact on open space, hydrology, ecology and residential amenity, the maximum area of garden taken up by a basement should be no more than 30%, not 50% as specified in the draft; and similarly with the amount of garden area of garden depth take up by a basement. To adhere to such a large limit will risk prejudicing the aspiration elsewhere in the draft of preventing the cumulative adverse impacts of basements.
- B (8) appears to contradict some of the previous sections allowing specific limited basement extension into garden space.
- The definition of a basement in paras 18.153 and 18.154 is welcome.

**C: In determining proposals for basement development, the Council will require applicants to demonstrate that proposals for basements:**

**Points (1) – (8)**

- The Society welcomes many of these points including Burland Scale 1 only damage to neighbours accepted
- The Society has previously recommended a requirement for a flood prevention device to avoid sewage backflow – we still believe this is necessary unless this is covered by C (2)
- Add **(9) will not cause harm to the ecology of the site or of the ecological corridor within which it is located.**
- A requirement to reduce the embodied carbon on basement developments needed.

**D. During the construction phase proposals must not place unreasonable inconvenience on the day-to-day life of those living or working nearby and construction impacts for the duration of the works should be minimised consistent with Policy D15 (managing impacts of construction).**

- We note that policy D15 goes further but is applicable to *all* construction projects, not just basements. Basements cause particular problems and so sometimes need specific requirements – see below.
- Policy D15C *will only permit* development complying with industry best practice, however there is no requirement to include methodology for temporary works, damage monitoring and construction, which are particularly relevant for managing impact of basement projects. This should be included in this policy.
- There should be a requirement for all basement excavations to be registered with the Considerate Constructors Scheme. Policy D15 D (1) requires this, but only for major developments. Major developments are usually undertaken by large professional firms well acquainted with considerate construction. Many single property projects are undertaken by less professional and well-resourced firms and so there can be a higher chance of problems for neighbours. All basement excavation projects should be required to register with the CCS.
- Policy D15 D (2) requires other local construction projects to be taken into account, but again only for major developments. Several small projects in close proximity can equally cause major problems, and so this should be a requirement for ***all basement*** developments.
- Para 18.170 says “*Further guidance on thresholds, scope and the level of detail expected in these plans will be set out in the Council’s validations checklist*”. - This may be a way to add this extra information, but separate basement guidance (as in Camden and RBKC) would be preferable.

**E: Impact of basement development on drainage, flooding, groundwater conditions and structural stability should be evidenced in the form of a Basement Impact Assessment and where appropriate a Basement Construction Plan. If it is identified that a Basement Construction Plan is required, then this will be secured via Section 106 or planning condition.**

- A requirement for a BIA is welcomed, but we consider that “*should*” should be replaced with “*must*” (in accordance with para 18.156 that says the Council will require a BIA).
- A basement Construction Management Plan must also form part of the main BIA to be submitted at the planning stage – without this information it is not possible to calculate whether the risk of damage can be limited to Burland Scale 1, as required by Policy C(1). Para 18.162 accepts that a construction methodology is required to calculate potential damage. It is surely not helpful to applicants to have an approved scheme potentially scuppered because the construction methodology provided by condition then results in Burland Scale damage assessments above level 1 and the project cannot progress. It must be better for all concerned for these calculations to take place at planning level. Per para 18.163, the information contained in the Basement Construction plan together with a condition for appropriate supervision is crucial in determining the risk of damage to neighbouring properties.
- Any amendments to a BIA or Basement Construction Plan will necessitate the risk of damage being recalculated. No work must be allowed to go ahead until the final plans comply with Policy C(1). This must be specified.
- Para 18.156 now requires a BIA to include geotechnical, structural engineering and hydrological investigations which is welcome.
- A suitable qualification requirement is welcome (para 18.156); however we strongly urge the council to specify that all professional consultants (eg structural engineers) who advise on basement excavations must be covered by professional indemnity insurance.
- Camden’s D6 F says the Council will “*expect developers to offer security for expenses for basement development to adjoining neighbours given the complex nature of basement development*”. The additional Camden Guidance (para 6.10) says that the Council encourages “a bond or insurances” to provide security in the event of a dispute, as part of a Party Wall award, but also when a party wall award is not required. This protection should also be added here.
- 
- Para 18.158 says an independent verification of the BIA will generally be expected, funded by the applicant which is welcome however as this increases the cost of the basement, this requirement should form part of the policy itself, rather than be hidden within supporting information where it can easily be missed.
- Para 18.159’s requirement for a non-technical summary is welcomed.
- The Society urges the council to include a requirement to provide for more specific site investigations as part of the BIA covering:
  - The minimum number of boreholes
  - An explanation for the location of the boreholes
  - Borehole readings for a whole year to cover seasonal groundwater variations.
Given the complex ground water conditions in areas of the borough like Highgate, the Society has been concerned to see applications for large and complex basements with wholly inadequate data to approve a basement which

could potentially damage neighbouring properties. This data must be provided at the planning application stage and must NOT be conditioned.

- **F: The Council will generally require a Construction Management Plan for basement developments.**

Policy D15 A says “*Development proposals that may cause adverse impacts during their construction must submit a Construction/ Demolition Management Plan setting out the anticipated impacts of development and how these are proposed to be mitigated.*” As all **basement** development can cause adverse impacts during construction, they should all be caught by this Policy. The wording of Policy D14 F is too weak – it should say that all basement developments **must** submit a C/DMP as part of a submitted BIA (as noted above).

*18.160 The cumulative effect of several underground developments in close proximity can be more significant than the impact of a single basement. The impacts include changes to ground water flow, land stability, surface water flow and flooding. Basement Impact Assessments must consider the potential wider impacts of basement schemes and the potential cumulative*

Add

*In the event that cumulative impact is considered likely to lead to adverse outcomes, the application will be refused.*

#### **Policy D15: Managing Impacts of Construction**

- E. During construction developers will be expected to explore the creative use of temporary measures to enhance the public realm.**

The Society would argue this *should* only apply to major projects.

## **Chapter 19: Heritage**

### **Introduction**

*19.02 ...Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.*

The Society strongly supports this statement and it is a cornerstone of the following statements of this response.

*19.04 We also recognise the need to contribute to a fairer and more sustainable and resilient borough by being proactive in both reducing inequities in access to the use and enjoyment of our historic environment and ensuring our heritage assets can sensitively respond to the climate emergency.*

Whilst accepting this statement, it must be remembered that with Historic Assets, particularly listed assets, there will be unavoidable restraints regarding climate change.

#### **Policy HE1: Built Heritage Conservation Charter**

##### **B Heritage Impact Statement**

**(3) have regard to the cumulative impact of incremental changes to those assets, including any contribution made by their setting**

Settings have not always been taken into account in recent planning approvals, and the Highgate society will be pleased to see a closer scrutiny of applications regarding this point.

**(4) where a proposal will lead to any harm to, or loss of the significance of a heritage asset, provide a clear and convincing planning justification for this**

To verify this point will, almost certainly, require a visit to the “site” from Haringey Planning. Inaccuracies on ordinance surveys can easily lead to misunderstandings and justifications can be vague.

19.08 ...*Haringey’s historic environment is in many cases valued and well maintained but is also threatened by development pressure, incremental and insensitive change, poorly considered alterations and poor workmanship.*

It is essential that these pressures are identified and dealt with at application stage

19.09 ...*The Council will support proposals which positively contribute to the preservation, restoration and enhancement of the borough’s heritage assets, in accordance with Historic England’s ‘Constructive Conservation’ principles”*

The Society applaud these principles.

19.10 To support delivery of the Conservation Charter, the Council will

- *take account of established best-practice guidance from Historic England, national amenity societies and other organisations when determining applications for the alteration of heritage assets and/or new development within a heritage setting;*
- *produce appraisals and design guidance documents with the input of local groups and other parties, to support Local Plan policies and to enable high quality development within the historic environment;*
- *continue the identification of local heritage assets with the input of local people, groups and national amenity societies to ensure recognition and protection of the quality of the built historic environment of the borough;*
- *continue to work in partnership with Historic England, neighbouring boroughs and other relevant groups on the protection and enhancement of the historic environment.*

The Society supports all these points.

19.11 ...*The Council is particularly keen that heritage assets can contribute to addressing the climate emergency and recognises that to make many heritage assets fit for contemporary use they may require changes to deliver energy efficiencies and greater resilience to climate change.*

It must be accepted that there will be limitations on achieving these efficiencies with regard to listed assets.

19.12 ...*Historic England’s published technical guidance. Both technical considerations and significance vary greatly from building to building therefore there is no one-size fits all approach to the retrofit of heritage assets.*

An important point, but need not require abandoning the building’s importance.

### **Heritage Impact Statements**

19.13 ...*The Heritage Impact Statement must describe the significance of any heritage assets affected, including any contribution made by their setting, and provide an assessment and justification of the impact of the proposal on the assets and their setting, explaining how complies with the policies set out in this chapter...*

This is an important and exacting necessity. Unfortunately, the standard of some Heritage and Impact statements have not met this criteria and Planners should be aware of what is required.

19.14 ...*The reinstatement of historic assets should be done using traditional, original, or historic materials, with the guidance of specialist advice and craftsmanship...*

The Society strongly supports this view.

#### **Policy HE2: Listed Buildings**

**A Development proposals affecting listed buildings and their contributing setting will be supported where they:**

**B: When considering the impact of proposals on listed buildings and their contributing setting, the Council will have regard to ...**

The Society supports all these policies.

#### **Supporting Text**

19.18 *The Council will support changes of use of listed buildings where this is causing the least harm to the significance of the building and its setting, and where the use will help secure the building's long-term viability. Restoration of the original use is encouraged where this would enhance the building's significance.*

This policy requires careful and knowledgeable considerations at planning level.

#### **Policy HE3: Registered Parks and Gardens**

**A. Development proposals affecting registered parks and gardens will be supported where they:**

**(1) respect preserve the special features of interest of those parks and gardens and their contributing setting from harm and conserve avoid any impact on their setting and historic significance;**

**(2) respect and enhance preserve or reinstate original or historic form, function, special features or character of those parks or gardens;**

However it's not clear how the council can "preserve and reinstate" anything in the park when the development is outside the park.

#### **Policy HE4: Conservation Areas**

**B: Proposals for the full or partial demolition of buildings and related structures within conservation areas must be robustly justified having regard to the significance of those buildings to the conservation area as a whole...**

The Society supports these views.

19.24 ...*The character and appearance of our conservation areas can be affected by development within them as well as development outside them where it is visible from them such as tall buildings...*

The Society refers Haringey to the proposed development at Archway Campus (Islington) which includes a 27-storey tower block which will be highly visible from Highgate Village Conservation Area. The Society would urge Haringey to add a line

about the need for Haringey to robustly defend potential damage to its Conservation Areas from development in neighbouring boroughs.

19.25 ...*detailed Conservation Area Appraisal and Management Plans (CAAMPs) in consultation with local residents and other stakeholders...*

The Society supports all consultations and Article 4 Directions

### **Demolition and balancing more recent challenges**

19.27 *All proposals for demolition should have regard to Policy CE2 and the Council's retrofit-first approach. Façade retention is not considered an appropriate justification for demolition in Conservation Areas as it results in the loss of the original design and wholeness of historic buildings and historic structures and generally will be resisted.*

The Society supports these views.

### **Heritage Impact Statements**

19.31 ...*Elements of built form and architectural interest such as the pattern of development, urban grain, siting, building line, rooflines, boundary treatment, the spaces between buildings, building height, massing, scale, proportion, rhythm, fenestration, and materials; Landscape, trees, and gardens (In conservation areas, trees that do not have a Tree Protection Order are also protected)...*

The Society supports these views.

### **Policy HE5: Non-Designated Heritage Assets and Archaeology**

In general, the Society welcomes and supports this section. We have made a number of suggestions below which we hope will clarify some points and thereby strengthen the overall aim of ensuring the protection of Haringey's archaeological heritage, which is currently inadequately understood, although the evidence shows that there is significant potential for new discoveries across the Borough.

#### **Non-Designated Heritage Assets**

**A. Development proposals should seek to conserve and, where possible, enhance and reveal the significance of non-designated heritage assets and their settings including:**

**(6) other heritage assets identified through the planning application, **public consultation** and decision-making process.**

**B. In assessing the impact of a proposal on non-designated heritage asset and its setting, the Council will have regard to:**

**(1) its significance **in national and local heritage terms**,**

**(3) whether the public benefits of the proposal **outweigh any resultant harm to the asset**,**

#### **Archaeology**

**C. Development proposals must conserve heritage assets of archaeological interest and their setting by taking **acceptable appropriate** measures proportionate to their significance.**

**D. Applicants are required to submit an appropriate Archaeological Impact Assessment, and where necessary, a field evaluation where:**

**(1) initial assessments indicate the site includes or has the potential to include heritage assets with archaeological interest.**

**(2) the site is within an Archaeological Priority Area.**

In this connection, it should be borne in mind that the official Historic Monuments Record can be incomplete, and that local historical, archaeological and amenity groups within the community may have a significantly deeper knowledge and understanding of the archaeological potential of the area. It is therefore strongly recommended that Archaeological Impact Assessments should be compiled in liaison with such groups.

### **Supporting text**

#### **Non-designated heritage assets**

19.32 Non-designated heritage assets, *while not meeting the same criteria as designated heritage assets, will nevertheless have a degree of heritage significance which requires appropriate consideration in planning decisions, however, do.*

19.34 *This is not a definitive list of non-designated heritage assets. Positive contributing buildings within Conservation Area Appraisal Management Plans are an indicator of significance and potential identification as non-designated heritage. Heritage assets can also be identified through planning applications, for example, during archaeological investigations.*

*Neighbourhood chapters in the Local Plan also provide an indication of areas and buildings of historic character that should be considered as non-designated heritage assets through the planning application process. Previously unrecognised heritage assets may also be brought to the attention of the Borough and the applicants as a result of input from local heritage, archaeological or amenity groups in the course of the public consultation process, and will then be taken into consideration by the Borough.*

19.35 *The Council will continue to maintain its lists on an ongoing basis and expand them to include additional assets that contain sufficient heritage significance to be considered non-designated heritage assets*

19.36 *Alterations and extensions to locally listed buildings should retain and where possible restore historic features that contribute to their special interest. They should adopt a retain rather than replace approach and, where practical and appropriate, use traditional materials and methods that are in keeping with their special interest. Proposed alterations and extensions should be prioritised on less sensitive parts of the building.*

### **Archaeology**

19.37 *Haringey has a long and rich archaeological history, much of which remains undiscovered because of the lack of archaeological survey until the modern age, making careful survey an essential part of a development programme. A range of heritage assets of archaeological interest from all historical periods have been found across the borough, including prehistoric occupation from the palaeolithic period through to the Iron Age, and the Roman era, while many of the towns and villages now comprising the Borough have their origins in the Anglo-Saxon, Mediaeval and Tudor periods, and evidence of important structures and other survivals, giving new insights into the social, industrial and agricultural history of Haringey and its residents over the millennia.*

19.42 *Our archaeological heritage provides a key opportunity for placemaking and for giving residents of Haringey a shared sense of common heritage. The presence of archaeological remains generates significant public interest, and applicants are strongly recommended to*

*incorporate an interpretive element into their proposals to reveal, interpret and present archaeological heritage where this would not impact on its preservation or undermine its significance.*

## **Chapter 20: Culture**

### **Policy C2: Cultural Facilities**

**F. In accordance with London Plan Policy HC7, the Council supports the retention of pubs and will only accept the loss of a pub through redevelopment, conversion or demolition where**

The Society welcomes this new standalone policy to protect the borough's pubs.

## **Chapter 21: Climate Resilience and Adaptation**

The Society welcomes the robust SuDS guidance set down in supporting text to Policy 21, items 21.84 21.85 21.86 21.87 21.88. However, bearing in mind the specific circumstances of Highgate it would like to see this strengthened. In SuDS management, there are two main interconnected requirements. One is to avoid surcharging the existing drains which is historically a combined soil and surface water system. In these circumstances a storm surge can have disastrous consequences. The other is more long term which is to ensure existing ground water conditions are maintained.

Historically storm surges have been dealt with through a civil engineered approach through the construction of attenuation tanks or a blue roof. This delays the discharge of surface water run off displaced by new development from the ground into the underground drainage system . This is accepted as a necessary solution in urban locations where there is limited external open space.

However, many developments have sufficient open space to provide alternative rainwater harvesting systems but still rely on the easier civil engineered system of tanks or reservoirs to provide attenuation either above or below ground. In Highgate, there is a complex ground water system which includes a number of springs which in turn form the head waters of some of our major water courses including the Heath Ponds and the rivers Fleet and Moselle . It is essential that no development results in a diversion of ground water feeding these into the main drainage system by the introduction of attenuation tanks or reservoirs which effectively reduce the amount of surface water permeating into the ground . These, whether underground tanks or surface reservoirs, can also be damaging by causing a similar coffer dam effect to basements thus disrupting water flow across the contours and impacting ground water levels in adjoining properties with resultant damage to trees and vegetation. The Society would like to see the draft plan reflect this in the supporting text by limiting the use of attenuation tanks, blue roofs or reservoirs to sites where there is no opportunity to employ other rainwater permeating techniques to ensure the maintenance of pre development ground water levels.

## **Chapter 22: Building a Zero Carbon Haringey**

### **ZC4: Energy Efficiency**

#### **Supporting Text - Implementation**

22.57 *Where energy targets apply to a proposal, the Energy Statement should set out Energy Use Calculations using Passive House Planning Package or equivalent industry-recognised software.*

The policy should set fabric-first minimum thresholds (e.g. an airtightness target for each type of development) because otherwise applicants can improvements in energy use intensity through equipment and accounting rather than improving building performance (and therefore reducing actual energy use).

### **ZC5: Low and Zero Carbon Heating Infrastructure**

The Society suggests adding a clearer ‘no new fossil fuels’ presumption for major development.

The Society also recommends including the validation/submission requirements checklist or matrix inside Chapter 22 with very clear triggers on when policies apply, and what documents are required and when. This really should be part of this consultation.

## **Chapter 23: Sustainable Travel**

23.01 A definition of the term “wheeling” would be helpful as it is not in common non-technical use. We take it to mean the use of wheelchairs and pushchairs but not scooters. The definition included in 23.19 could usefully be referenced here.

23.02 We note that sustainability of transport is also a matter of technological change involving the increased use of electrical vehicles, which therefore permit increased use of sustainable energy sources such as solar and wind power. Improvements in sustainability can be expected to continue regardless of additional planning policies or initiatives. Sustainability of transport is complex and public transport is normally categorised as sustainable for the purposes of the London plan targets. It would be helpful to make this clear.

23.03 The wording wrongly suggests that only walking and cycling are sustainable. It would add clarity to separate the health aspects of travel, namely (i) “active travel” (which should be defined), and (ii) pollution effects from the subject of sustainability. Walking is the most widely used form of active travel.

Vehicles are a source of pollution, though as mentioned, have become and can be expected to continue to become less polluting.

Page 690 The map is extremely hard to follow and seems incomplete. It might be better covered in several maps each covering different aspects. Some specific comments are:

- The Parkland Walk is shown as a dotted green line, but not listed in the map key
- Crossrail 2 (brown colour in the key) doesn’t seem to appear on the map
- the use of a yellow line for the borough boundary means that the status of the roads that in some places form the boundary, particularly in Highgate, is not shown. For example, is Hampstead Lane a proposed cycle route? Is it a

- classified road? (Do the relevant boundary boroughs have the same understanding of the status of the roads?)
- the distinction between existing cycle routes and proposed cycle routes cannot be clearly seen because of the similarity of colours used.
- which colour is used for a road which is classified and also a cycle route?

### **Policy T1: Achieving Sustainable Travel**

**A Development should take a vision-led approach to transport planning. As part of this, all proposals must:**

**(4)** Strictly this should, we assume, be worded as giving priority of **highway** space, as we assume there is no intention to give priority of **road** space to pedestrians. It is not clear what “*vehicle sharing networks*” are. Road space is a valuable but scarce resource because there is no general policy to build additional roads, which we agree with. Hence setting priorities for road space use without regard to the amount of usage of each type, risks unintended consequences. For example, how many cyclists are required in order for a dedicated cycle lane to be required?

**(5)** The use of “and/or” wording is confusing. Possibly the intended wording would be: *“ensure that significant impacts on the operation, safety and sustainability of the borough’s transport system and on traffic conditions and road safety, are avoided or mitigated”*

**B Applications should be supported by a Transport Assessment, Transport Statement in line with Transport for London published guidance. Evidence submitted should demonstrate that, where necessary, identified transport impacts will be appropriately mitigated.**

Use of the word “mitigated” suggests that the transport impact of a development will always be negative, but this might not always be the case, for example where a new development supports the demand for a new station.

23.10 The need to reduce carbon emissions is agreed, but with only “nearly one fifth of Haringey’s carbon emissions” coming from transport, and likely to be falling anyway due to the move to electric vehicles, more context would be helpful to understand why moving to sustainable transport modes is the **best** way to address the sustainability issue.

23.14 We welcome the recognition that there are those who are unable to use active travel or public transport. We also highlight that there are some journeys for which active travel or public transport are not feasible; this may not require vehicle ownership but could involve car sharing or similar.

### **Policy T2: Walking**

The Society fully supports this. However, we note that at present pavements are not as pleasant as they should be for walking due to (i) sometimes poor quality maintenance, which may be partly due to the original choice of surface materials; (ii) abandoned hire bikes; and (iii) other street clutter such as sign boards. Unauthorised use of pavements for cycling is also a problem, and if possible designs should seek to minimise the attractiveness of pavements for cycling. Designs which involve shared use by

pedestrians and cyclists should in our view be avoided because of the significantly different speeds of cyclists and pedestrians. In particular, E-bikes which generally travel faster, and are heavier, are a risk for pedestrians and can discourage walking.

### **Policy T3: Cycling**

The Society supports this. However, it may be sensible to caveat some of the requirements. For example the minimums listed may not be appropriate for disabled accommodation, or retirement homes. The comments above relating to walking should be considered, and it would be helpful to add text about the need to avoid conflict of cycling routes with pedestrians. While there are ambitions to increase the amount of travel done by cycle, TfL data shows cyclists in 2023 comprised a 4.5% mode share, while walking is 25.8%. (Bus is 12.9%, Overground and National Rail is 10.1% and Underground is 9.8%).

### **Policy T4: Public Transport**

Supported.

### **Policy T5: Car Parking**

The policy is detailed and designed to limit the amount of parking for new developments. The link with PTAL reflects our own observation that car ownership is typically lower near locations with good public transport. However, other aspects of the policy appear inflexible, as car ownership is not the same as car use. We do not support the provision of unlimited parking, but believe a policy with greater flexibility is required.

The policy is stated as being to reduce car use and promote more active travel but seems poorly targeted and risks unintended consequences. Reducing car parking does not necessarily reduce car use. A car which is in use does not require parking, and two heavily used cars could even share one space, while one little used car would need its own permanent space. While we agree with the objective of reducing use of cars for travel and encouraging other ways of travelling, we would prefer other more direct ways of achieving this.

The parking needs of disabled residents are recognised but in a formulaic approach which risks providing too many disabled parking spaces when a development has few disabled residents, but too few when a resident's health changes and through life changes they may become disabled.

There is also a risk of limiting employment opportunities for residents who may not be able to take up jobs which require parking for commuting or use of a vehicle for work. References to car clubs may need reconsideration in light of Zipcar's intention to cease business in London.

### **Policy T6: Vehicle Crossovers**

Agreed. We do not support the conversion of front gardens into parking space. For that reason we support the proposed policy which imposes strict conditions on cases where new crossovers will be allowed. High quality trees should be a reason for refusal but this should be extended to express a presumption in favour of retaining the biodiversity that a garden can involve.

## Policy T7: Freight, deliveries and servicing

No comments.

## **Chapter 24: Blue and Green Infrastructure**

### **Introduction**

The Society welcomes the prominence given to green and blue infrastructure within the Draft Local Plan and strongly supports the recognition of biodiversity loss, climate adaptation, ecosystem services and environmental net gain set out in paragraphs 24.01–24.11. We particularly welcome the acknowledgement at paras 24.08–24.09 of the statutory duty on local authorities to conserve biodiversity and the urgent need for nature recovery at local level.

However, throughout Chapter 24 there is a recurring weakness in relation to **delivery, long-term management, monitoring and enforcement**, particularly where policies rely on 30-year maintenance periods, private management arrangements, or future landownership. Our detailed comments below focus on strengthening these aspects to ensure that biodiversity benefits are real, measurable and lasting.

*24.02 Haringey is home to a wealth of green and blue infrastructure. The east of the borough contains part of the unique Lee Valley Regional Park, the borough has large public parks at Alexandra Palace and Finsbury Park as well as a network of smaller, local parks across the borough, and the Moselle Brook originates in Muswell Hill and Highgate flowing onwards through Tottenham and towards the Lea Valley.*

Add **Such features as railway lines and private gardens form an integral element of the local ecosystem and their protection and enhancement will be an essential element of protecting the biodiversity of the Borough.**

### **Policy G1: Green and Blue Infrastructure (including paras 24.12–24.18)**

The Society supports Policy G1 and its holistic approach to green and blue infrastructure, including biodiversity, trees, food growing and watercourses. The Green & Blue Infrastructure Principles (Policy G1B) are sound and align well with national and London Plan policy.

#### **Key concerns and suggested improvements:**

- **Monitoring and management (Policy G1C):**
  - o Policy G1C requires Green & Blue Infrastructure Plans to set out how infrastructure will be managed, maintained and monitored “for an appropriate period”, but this is vague.
  - o We recommend specifying **minimum monitoring periods**, aligned with biodiversity net gain requirements (i.e. 30 years), and requiring:
    - Named responsible parties
    - Monitoring frequency (e.g. years 1, 3, 5, then 5-yearly)
    - Clear success criteria and remedial triggers
- **Council resourcing:**
  - o The policy should clarify how monitoring will be resourced, including the use of **developer-funded monitoring contributions** and whether these will be secured via planning obligations.
- **Change of ownership:**

- We recommend explicit wording to require that long-term management obligations are secured **in perpetuity through legal mechanisms** that bind successors in title.

24.13 *The starting point for achieving the aspirations of the Local Plan is to protect existing green and blue infrastructure in the borough. This is made up of a mosaic of different assets ranging from Local Nature Reserves, Sites of Importance for Nature Conservation and the Lee Valley Regional Park which contains European designated sites and is a Site of Special Scientific Interest (SSSI). Private gardens are also an integral element of the ecological corridor. Fully delivering on the Council's aspirations will require significant enhancement of existing green and blue infrastructure as well as provision of new infrastructure. New development provides a key opportunity to help facilitate and deliver this.*

24.21 *Ecosystem services are the benefits society gets from the natural environment. These include the food we grow, the shade trees provide, the clean air we breathe, the water we drink, soils we grow food in, the educational value of enhanced public knowledge of the natural environment, and the positive effect nature has on our mental and physical health.*

24.27 *In places like Haringey where there is a scarcity of land it is particularly important to ensure that our green and blue infrastructure is helped works hard to deliver a range of functions and benefits for people and the environment.*

### **Policy G2: Green Belt and Metropolitan Open Land** (including paras 24.31–24.32)

The Society supports the strong protection afforded to Green Belt and Metropolitan Open Land (MOL), particularly given their biodiversity, cooling and flood mitigation functions. The reference to MOL's strategic role within London's green infrastructure network is welcomed.

#### **Suggested enhancement:**

- We recommend adding explicit reference to **nature recovery and biodiversity enhancement** within MOL, not solely protection from development, including support for habitat restoration, improved management of existing habitats, and ecological connectivity.

### **Policy G3: Open Space and Recreation** (including paras 24.33–24.44)

**The Society** supports the protection of designated open space and the emphasis on quality, accessibility and addressing deficiencies. Paragraphs 24.43–24.44 rightly highlight the importance of open space for biodiversity, air quality and climate resilience.

#### **Key concerns and suggested improvements:**

- **Biodiversity safeguards:**
  - Policy G3 focuses primarily on recreational function. We recommend stronger safeguards to ensure that recreational enhancements do not lead to **biodiversity degradation**, for example through over-intensive use or inappropriate landscaping.
- **Replacement open space:**
  - Where replacement open space is permitted, policy should require **equivalent or greater biodiversity value**, not just equivalent size or accessibility.

- **Monitoring:**

- Enhancements proposed under G3 should be subject to post-implementation monitoring to ensure biodiversity outcomes are delivered.

Also A. – D. appear to relate only to Designated Open Spaces. A further specific policy on the value of undesignated open spaces and the importance of protecting them as a part of the ecological corridor system is needed. (policy G.5.A only briefly mentions undesignated open spaces).

24.33 Access to *high quality open spaces and opportunities for sport and recreation and ecological education* are highlighted as an important aspect of healthy communities in the NPPF, and development should deliver a high standard of amenity for existing and future users.

#### **Policy G4: Urban Greening** (including paras 24.45–24.56)

The Society strongly welcomes the Urban Greening Factor (UGF) requirements, the clear preference for biodiverse living roofs, and the rejection of sedum blanket roofs due to limited biodiversity value.

##### **Key concerns and suggested improvements:**

- **Long-term performance:**

- Policy G4E requires management to be secured for the life of the development but does not specify **how compliance will be checked**.
  - We recommend:
    - Mandatory post-completion inspections
    - Periodic reporting on condition and functionality

- **Off-site contributions (para 24.56):**

- While off-site contributions may be necessary, these should be tightly controlled to avoid undermining on-site nature recovery.
  - We recommend requiring **transparent reporting** on where off-site greening is delivered and how biodiversity outcomes are measured over time.

- **Maintenance failure:**

- The policy should clarify consequences if greening elements are not installed or fall into disrepair, including enforcement action or financial penalties.

#### **Policy G5: Biodiversity and Biodiversity Net Gain** (including para 24.58–24.66)

The Society strongly supports the ambition of Policy G5, including the prioritisation of on-site BNG, alignment with the London Local Nature Recovery Strategy, and the requirement for Habitat Management and Monitoring Plans but are concerned about deliverability.

##### **Key concerns and suggested improvements:**

- **30-year management and monitoring (Policy G5J):**

- While monitoring contributions are welcomed, the policy lacks detail on:
    - Monitoring frequency
    - Who undertakes monitoring
    - How failures are identified and addressed

- **Council capacity:**
  - o The Plan should clarify whether the Council has (or will have) sufficient ecological expertise and staffing to oversee long-term BNG delivery.
- **Enforcement and remediation:**

We recommend explicit wording to require:

  - Remedial action where habitats fail
  - Financial bonds or contingency funds to ensure replacement or repair
- **Change of land ownership:**
  - o As with G1, obligations must be legally binding on future landowners.

*24.60 Epping Forest is a designated Site of Special Scientific Interest, and a portion is designated as a Special Area of Conservation (SAC). The Epping Forest SAC lies within Epping Forest District Council, the London Borough of Waltham Forest and the London Borough of Redbridge administrative areas. SACs internationally important areas given special protection under the EU's Habitats Directive (92/43/EEC) which is transposed into UK law by the Conservation and Habitats of Species Regulations 2017 as amended (known as the Habitats Regulations). New residential developments can result in an increase in the number of visitors to Epping Forest impacting upon the SAC. New residential developments within a 6.2km recreational 'Zone of Influence' may therefore be required to contribute financial planning obligations for Strategic Access Management Measures (SAMMs) and Suitable Alternative Natural Greenspaces (SANGs) to mitigate the harmful impacts by visitors to Epping Forest SAC. While describing the importance of Epping Forest as a site of national importance outside the Borough but impacting on its ecology, the council have omitted to mention another, much closer, site of national importance, which actually abuts the borough - Hampstead Heath and Kenwood. Developments in the west of the Borough must take account of this, and similar references should be made to this.*

#### **Policy G6: Trees (including paras 24.68–24.72)**

The Society strongly supports the protection of trees, the 30% canopy cover target, and the use of CAVAT where loss is unavoidable. The emphasis on early design integration is particularly welcomed.

#### **Suggested enhancement:**

- We recommend explicit requirements for **post-planting survival monitoring** (e.g. 5–10 years), with replacement planting where failure occurs.

#### **Policy G7: Food Growing (Paras 24.73–24.75)**

The Society supports the encouragement of food growing and recognises its biodiversity and community benefits.

#### **Suggested enhancement:**

- We recommend clearer guidance on how food growing spaces can be designed to **maximise biodiversity**, for example through pollinator-friendly planting, soil health and avoidance of pesticides.

*24.73 Community food growing sites deliver multiple physical and mental wellbeing benefits to residents including the production of healthy, fresh food, greater exposure to natural environments and wildlife physical activity and social connections. **In this connection, new trees should, where possible, be of species which reflect and reinforce the local ecosystem.***

## **Policy G8: Watercourses (Paras 24.77–24.80)**

The Society welcomes the strong emphasis on restoring watercourses, buffer zones, de-culverting and ecological enhancement. The reference to achieving ‘good’ ecological status is particularly important.

### **Key concerns and suggested improvements:**

#### **1. Lifetime functionality (Policy G8A(9)):**

- The requirement to demonstrate functionality for the lifetime of development should be supported by **mandatory monitoring and maintenance schedules**.

#### **2. Enforcement:**

- The policy should clarify consequences if watercourse enhancements fail or are not maintained.

**A. Proposals adjacent to watercourses or over culverted watercourses must contribute to the restoration and enhancement of the borough’s Blue Ribbon Network, including Pymmes Brook, Moselle Brook, Stonebridge Brook, the River Lee and its tributaries. To achieve this, development will be required to Add (11) demonstrate that developments, and particularly those involving basements, will not adversely affect the flow of the many underground streams which cross the area, and which in many instances will feed into known above-ground watercourses.**

### **Concluding Remarks**

The Society strongly supports the ambition of Chapter 24 and its recognition of biodiversity as fundamental to climate resilience, public health and quality of life. The emerging London Local Nature Recovery Strategy reinforces the need for local plans to move beyond aspiration and ensure that biodiversity delivery is strategic, accountable and long-term.

Without clearer mechanisms for **monitoring, enforcement, resourcing and long-term accountability**, there is a significant risk that many of the proposed biodiversity gains will not be realised in practice. We therefore urge the Council to strengthen Chapter 24 accordingly, particularly in relation to biodiversity net gain, urban greening and green infrastructure management, and to explicitly align policy wording with the London Local Nature Recovery Strategy as it is finalised.

## **Chapter 25: Housing**

The introduction in this section sets the following broad strategies:

- Delivering 15,920 new homes by 2036.
- Requiring 40–50% of new homes to be genuinely affordable, with a focus on social rent.
- Ensuring a mix of home sizes, including family-sized and accessible homes.
- Supporting community-led housing, Build to Rent, and specialist housing for older and vulnerable residents.
- Safeguarding existing homes and resisting conversions that reduce family housing.

- Protecting and enhancing social infrastructure, including schools, health centres, libraries, and youth hubs.
- Requiring play space and public toilets in new developments.
- Promoting co-location of services and shared use of facilities.
- Securing contributions from new development to meet local infrastructure needs.

The Society welcomes these aims in principle but is concerned that some of these may not be practicable or achievable. The Society has lengthy experience of housing and whilst housing delivery is developer led, it feels it is unlikely that all these aims will be achieved. Further detailed responses on each policy within this section are given below although the issues relating to infrastructure are covered elsewhere.

### **Policy H1: Meeting housing needs**

- Delivering 15,920 new homes by 2036

As further detailed in the supporting text, this is a top down figure delivered at national level (1.5 million new homes by 2030) and then distributed at regional and then local level. It is basically quantitative rather than qualitative and takes little account of the ability of respective communities and the infra structure to absorb these new homes.

Additionally, as the target is assessed by the number of units to be provided, councils could, to meet their targets, favour the provision of a higher number of smaller units over larger much needed family units. To establish the number of people being housed and to relate to the housing list, targets need to be refined to provide numbers and breakdown of bed spaces rather than units.

The policy makes the assumption that the construction industry has the capacity to deliver this number of units. Currently the indicators suggest it is not. There is a perfect storm building of skill shortages, inflated building costs, delays in the legislation processing and a collapse in the market. The DCMS seems to indicate that relaxing the NPPF will drive further home delivery. However, whilst this is being promoted with one hand, the regulatory burden is being increased with in other areas, particularly with High Risk Buildings and the Safe Buildings Register.

What would be useful is for the Plan to caveat this undertaking and also look at ways to encourage building.

The policy also seeks to safeguard existing homes and resist conversions that reduce family housing. At one level the policy is against the loss of family housing by subdivision for flats and at the other is against the return of converted housing to single family accommodation. This does not reflect differing personal circumstances and cases where subdivision or deconversion could be appropriate and allow people to stay in their homes as their family structure evolves. The Society would like to see a degree of flexibility introduced here rather than a blanket refusal to countenance any change.

In terms of the loss of affordable housing, particularly social rent, the Right to Buy legislation needs overhauling. The greatest loss of social rented accommodations has been through this and it would be useful to see something in the Local Plan recognising this and looking at ways to preserve its existing bank of social rented accommodation.

## **Policy H2: Genuinely Affordable Housing**

- Requiring 40–50% of new homes to be genuinely affordable, with a focus on social rent.

The Housing Strategy identifies a critical need for a diverse mix of homes, including genuinely affordable homes, with a strong preference for social rent and London Living Rent. The Society welcomes this.

However, currently, any scheme where the requirement for affordable is deemed unacceptable by the developer will undergo a rigorous viability study which usually involves a substantial reduction on stated policy, often to around 20% or even less. This process is lengthy and can add over a year to the planning process. This is recognised by the Mayor in his current emergency measures which set the figures at 20%. It could be argued that a requirement for 40-50% affordable homes will act as a detractor for potential developers thus undermining the target for new homes.

There is then the issue of what is affordable. The majority of affordable housing will be intermediate rental with a small proportion of shared ownership and genuinely affordable social rent. Haringey is an expensive area and for most of the population. The reduced figure for affordable rent is likely to be 80% or so of market rent. 80% of unaffordable remains unaffordable

## **Policy H3: Housing mix**

- Ensuring a mix of home sizes, including family-sized and accessible homes

The figure of 30% 3 bed (excluding shared ownership) and no studios is welcomed by the Society and will help to address an identified need.

Much of this housing currently being provided is in high rise blocks which are inherently unsuitable for families and social rent as demonstrated by the moratorium put on this form of development for families and “council housing” by the GLC and other London Boroughs in the 70’s. One wonders what has changed.

However, the Society’s experience is that there is little adherence to housing mix in developments, with a majority of housing units being small 1 or 2 bed units, or if student housing is provided on site, considerably less. The Society has recently objected to a major development in an adjoining borough with student housing where the mix for the overall site development was an eye watering 76% studios and one bed roomed flats.

Haringey also needs to be aware that, as required housing provision is proscribed by number of units, it could be argued that there would be a temptation to approve a scheme of predominantly small flats to push up the unit numbers. Although this method of meeting targets is government led, it is hoped that the Plan will identify a mechanism for dealing with this, possibly identifying bedspaces instead of units.

## **Policy H4: Build to rent**

- Supporting community-led housing, Build to Rent, and specialist housing for older and vulnerable residents

This is supported by the Society, particularly the requirement to conform to the London Plan and to provide a proportion of affordable housing. However, as for Intermediate Rent elsewhere in this document, it should be noted that the figures for affordable housing are a percentage of market rent which does not significantly reduce the cost.

**Policy H5: Small sites and smaller housing developments:**

This is welcome and aligns with policy H2 of the London Plan.

**Policy H6: Self-build, Custom-build and Community-led Housing**

The Society welcomes this policy.

**Policy H7: Housing Older People and Vulnerable People**

- Supporting community-led housing, Build to Rent, and specialist housing for older and vulnerable residents

In Highgate we have recently seen a proliferation of high end specialist housing for older residents with 3 luxury developments approved in the past year. It is common for these forms of developments to be located in areas of high property value and they are often being provided on large sites displacing existing care homes or the potential for much needed housing, including the affordable element. The Society would request inclusion within the Local Plan of a requirement to make an assessment for the provision of these developments.

**Policy H8: Large scale purpose built shared living**

This alternative method of accommodation is welcome in principle as long as it does not become, like student housing, a lucrative tool for developers to circumvent their obligations to conform to the London Plan and the need to provide affordable housing.

**H9: Purpose built student accommodation**

25.94 identifies that there is no current need for additional purpose-build student accommodation in the borough. The provision of student accommodation is very popular amongst developers as witnessed by the high number of large student schemes nearing completion or in the pipeline all over London. Student Housing is a highly profitable form of development with tax breaks and it provides methods of avoiding the more onerous requirements for housing standards as set down in the London Plan and most notably, the provision of affordable housing. The situation between regional and local government is also unclear. Whilst Boroughs have policies in place to prioritise family housing and thus refuse these schemes, many are called in by the GLA and subsequently approved.

There is also a concern that in the future, surplus student housing could be converted, possibly under PD Rights into traditional housing and resulting in substandard accommodation.

The Society would like to see this clause considerably strengthened to state that unless there is an identifiable need for student housing, with a higher education body prepared to take it on, this will not be permitted.

#### **Policy H10: Gypsy and Traveller Accommodation**

The policy in Part a. to protect the existing 2 pitches is welcome. However, the provision of 33 new pitches is likely to create a tension between the need to optimise site development to provide much needed family accommodation and the need to provide low density gypsy and traveller accommodation.

#### **Policy H11: Loss of Existing Housing**

This policy is generally welcomed by the Society except for the requirement in A for the new floor space to be less than 125 m<sup>2</sup>. It is felt this is much too prescriptive and does not recognise the differing typographies of the various house forms.

In B. there should be added that any demolition and rebuilding of an existing estate should provide a substantial uplift in the number of affordable housing units. In other boroughs the Society is seeing large scale developments which triple the number of units on the site but with no or only marginal uplift in the number of affordable housing units provided. This has understandably led to considerable opposition from the current residents who see their community being torn apart, a loss of amenity and green spaces and increased pressure on the infrastructure, in order to provide housing which does little or nothing to address housing need.

#### **Policy H12: Residential Conversions, Houses in Multiple Occupation, and Hostels**

This policy is welcome except for the requirement for a maximum of 1 no. single bed unit in each conversion. House conversion is a complex task and the floor plate may require more than 1 no, single bed unit to optimise development. The Council should ensure this element of the plan allows more flexibility.

### **Chapter 26: Social Infrastructure**

#### **Policy S3: Play Space**

The Society has seen applications where the proposed play space(s) may meet the required space of 10sqm per child but shape of the space itself is not suitable for a play area e.g. a long, thin play space which is much less inviting and suitable for play. Our suggested addition to the policy ...**The play space must be of sufficient size, appropriate configuration and demonstrable functionality for the intended age group.**

### **Chapter 27: Employment and Industry**

No comment.

### **Chapter 28: Town Centres and High Streets**

This section is disappointing as although High Streets are mentioned in the title the policy deals almost exclusively with Town Centres. The fabric of Haringey is made up of

a rich tapestry of differing scales of uses which are vital to the continuing function of the borough. All scales of shopping streets should be included

The Society had understood from a previous consultation with Haringey that Archway Road was to be designated a District Centre but figure 212 indicates that this is not the case and it is only designated a Local Centre. This is extremely disappointing as it is felt that categorising the parades as a district centre is justifiable for the following reasons:

- Archway Road is an important and vibrant economic area with a variety of businesses
- Many businesses are incubator units able to exist due to relatively cheap rents and can be a catalyst for economic growth
- The shopping area suffers from being on the major trunk route, the A1 and as such the designation as a district centre could bring additional support
- The future viability of the street is under attack due to the change of use from Class E to C3 through Permitted Development rights. It should be noted that Haringey, in spite of numerous requests from the community over the years, are not at this stage prepared to provide Article 4 protection against PD change of use which many other London councils have done.

Highgate High Street is the other shopping street located in the Village and presents a very different profile being a historic village centre. A high proportion of its trade is from the two major schools located in the area and tourism, both of which can be affected by seasonal variations in trade. It also suffers from high rents and from being split between Camden and Haringey. The Society feels that better communication between Camden and Haringey would be of enormous benefit and the anomalous situation resolved whereby the Camden side of the High Street is protected against PD rights for change of use through an Article 4 agreement whereas the Haringey side is not, although it is accepted that many of the Haringey side buildings are listed and thus PD rights would not apply.