

DM1 A & B	No								
	It should be made clear whether this policy takes precedence over policies relating to conservation areas								
DM7	This policy is welcomed with reservations		Building heights should be subordinate to surrounding properties.						
DM9	No		No						
As a whole	It is not clear how DM9 relates to DM1								
As a whole	We note that the earlier DM12 has been entirely re-written following comments from English Heritage, Highgate CAAC and others regarding inconsistencies with NPPF and other matters.		This policy, having been entirely rewritten, is being consulted upon for the first time. We trust the Examiner will consider what has been dropped (including the earlier DM33) to ensure our heritage assets will be sufficiently protected						
D : Conservation Areas	The words 'do not' appear to be missing before 'detract' in line 3	No	Correction		No				
Para 2.26	Satellite dishes have an adverse effect on Conservation Areas where located in a position where they are visible from CAs.	No	Para 2.26 suggests that policy is flexible on this point which would be unacceptable		No				
Para 2.58	The word 'agreed' in line 5 is inappropriate	No	The function of a Heritage Statement is a means for the Applicant to suggest to LBH what the significance of the Asset is. On receipt of that document, LBH may agree, or not, with that assessment		No				
Para 2.58	Last line: add 'Area' between 'Conservation' and 'Advisory'		Correction						
Para 2.59	'Highest, moderate and low significance'		Cite source of these criteria						
DM11									
Para 3.3, 3rd bullet	'... strategic Borough target of 40%'	No because it conflicts with para 3.8 below	Evidence base may suggest this is the case now but it would be regrettable to give a firm target with the result that advantage cannot be taken of fluctuations in the economy and land values. This policy should be framed in the same way as the Carbon reduction one : Haringey will achieve targets in line the national and London Plan policy and/or:		No	No	No		
Para 3.8	'robustly seek... affordable housing'	No	Adopt a Haringey or, if it comes forward, a		No	No	No		

			London Plan, format for viability statements that are transparent, robust and reliable with Section 106 agreements to allow claw-back of profits in excess of those anticipated to be returned to LBH, ring-fenced for social or affordable housing.						
DM12	No								
	Para 3.15 states full width extensions would not normally be acceptable. Guidance on when full width extensions would be acceptable would be helpful and aid sound and consistent decision-making in Conservation Areas and elsewhere	No	Clarification recommended		No			No	
DM18	No				No				
Additional clause recommended	The residential basement policy needs strengthening. We suggest that the following clauses be added to the policy for residential properties: a) basement development does not involve the excavation of more than one storey below the lowest original floor level (except in the case of swimming pools) and should be within the existing footprint of the property b) natural ventilation and daylighting should be used where habitable accommodation is being provided and ventilation and lighting should be energy efficient c) Given the significant disruption of basement construction on adjoining neighbours, a construction management plan which demonstrates that the applicant will comply with the relevant parts of the Council's Code of Construction Practice and be aware of the need to comply with other public and private law		These policies are adopted by other Councils in London- look at Westminster Council and Camden Council Recent basement applications in Haringey involved inappropriate proposals that could have been dealt with if these clauses had been in effect						

<p>requirements governing development of this kind</p> <p>d) a basement extension will not be permitted where the purpose is to create a new dwelling house in the residential property or for the purpose of further subdividing the existing residential property</p> <p>e) where a basement extension is to a terraced property, the impact on the terrace as a whole (not just the adjoining property) needs to be considered to ensure it is stable, particularly if the terrace is on a slope</p> <p>f) the cumulative impact of a number of basement developments in the same terrace needs to be carefully considered.</p> <p>g) provide a satisfactory landscaping scheme, incorporating soft landscaping, planting and permeable surfacing as appropriate;</p> <p>h) not result in the loss of trees of townscape, ecological or amenity value and, where trees are affected, provide an arboricultural report setting out in particular the steps to be taken to protect existing trees; there should not be a net loss of trees. New replacement trees should be at least semi-mature and of indigenous species</p> <p>i) incorporate sustainable urban drainage measures to reduce peak rate of run-off or any other mitigation measures recommended in the structural statement or flood risk assessment;</p> <p>j) protect the character and appearance of the existing building, garden setting or the surrounding area, ensuring lightwells,</p>										
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	plant, vents, skylights and means of escape are sensitively designed and discreetly located; k) protect heritage assets, safeguarding significant archaeological deposits and in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where this contributes to significance;								
A. a - g	We suggest in 'b' that reference is made to DM24								
A. h - i	We suggest that issues of safety, nuisance, etc during construction should be in a separate clause on Construction Management Plans which should be based on HSE Guidelines		In 'h', we suggest adding after 'harm to' in first line : 'neighbours or people passing over their land; to'		No				
B	We suggest reference should be made to DM24 including to the supporting documents (see our comments on DM24)	No			No				
DM20	The London Plan Green Grid is broad-brush. We regret the loss of detailed Green Corridors set out in the earlier (Jan 2015) DM27 and the map attached thereto	No			No				
DM24	Flood risk arising from breach of Reservoirs not adequately covered	No	It should be made clear which, or both, of these documents are provided in evidence: Haringey's Strategic Flood Risk Assessment 2103 and JBA's Flood Risk Assessment 2015. Both documents state that bedrooms should not be located in basements within areas indicated in NRIM. It is not clear from policy if these recommendations apply.		No			No	
DM33	This policy is welcomed								
DM34	This policy is welcomed								
DM35	This policy is welcomed								
DM40	No			No					
B.	Loss of employment floorspace. The policy as written is unsound.		Where a development involves demolition of a building containing employment floorspace, the same area of floorspace must be provided						

			in the proposed building. Replacing lost floor space elsewhere will reduce flexibility and vitality of economic activity essential for growth. Using Section 106 monies for training loses the floor space altogether and would therefore be unacceptable.						
DM44	No equivalent policy at first consultation stage. Map required								
A.	'a window display or other appropriate town centre frontage'	No	Ye Olde Sweete Shoppe in Quernmore Road N4 has received much local opprobrium and mockery. It is doubtful that BRE Daylight and Sunlight standards have been reached in the dwelling which has replaced the shop. The Design Quality and Quality of Life (Jan 2015 DM2) of the dwelling is compromised. However it is noted that Quernmore Road is shown as a Local Shopping Centre on the Policy Map. We assume non-retail uses would not include conversion of shops to residential within a Conservation Area or elsewhere	No					No
Urban Characterisation Studies	Unsound because not adopted and not evidence-based. There are many typographical errors throughout the documents and road names are wrong. We suggest these documents are not fit for purpose. The area on the Stroud Green Map does not follow the outline of the Conservation Area. We do not know what the outline represents.	No	While we welcome these studies, we consider that it is regrettable that they appear to have been produced without any consultation with CAACs, amenity societies or local people. It is not clear on what basis they have been included on the Council website or referenced in the Development Management Policies. We consider they should be given little or no weight in decision-making and references to them should be removed.						
			There is no mention of the Conservation Area						
			How does it relate to DM1 and DM9?						
			SGCAAC considers this document should be withdrawn						