COMMENTS ON HARINGEY'S DEVELOPMENT MANAGEMENT POLICIES PUBLISHED JANUARY 2016 FROM THE HIGHGATE SOCIETY

DM policy no. DM1 Delivering High Quality	Are the Local Plan documents sound?	Is the document justified?	Is it based on robust and credible evidence?	Is it the most appropriate strategy when considered against the alternatives?	Is the document effective?	Is it deliverable ?	Is it flexible?	Will it be able to be monitored?	Is it consistent with national policy?
Design									
A. a, b,	No	Yes	No	No	No			No	
B. a, b,	No	No	No	No	No			No	
D. b	No	No	No	No	No			No	
	The above policies are too loosely framed and not supplemented in subsequent policies to ensure the public will have confidence in planning decisions. DM3 (January 2014 version) should be reinstated to ensure confidence in decision-making which may otherwise prove inconsistent, undermining the credibility of the planning process.		We note that DM3 (Jan 2015 version) was dropped following responses from a small number of agents responding to the Jan 2015 consultation on behalf of their clients with vested interests in particular sites. We do not therefore consider the decision to drop DM3 was sound. Lack of response in support of DM3 should not lead to the assumption that it was generally regarded as unsound.				It is too flexible		
DM1 A & B	No		, ,						
	It should be made clear whether this policy								

	takes precedence over polices 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	We note that the earlier DM12 has been entirely re-written following comments from English Heritage and Highgate CAAC 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		No		
Para 2.26	Satellite dishes have an adverse effect on Conservation Areas where located in a position where they are visible from the CA.	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 disagree, or not, with that assessment	No		
Para 2.58	Last line: add 'Area' between 'Conservation' and 'Advisory'					
	The Highgate Society Sustainable Homes Group commends the policy put forward to Highgate Neighbourhood Forum		"The Forum encourages alterations to existing buildings to enhance energy efficiency, provided that the character of the building is not prejudiced and the risk of long-term			

DM11			deterioration of the building fabric or fittings is not increased. Where applicants intend to invoke the energy efficiency exemptions allowed in Part L1B for historic and traditional buildings, they must explain how they have followed the English Heritage guidance that the regulations say they 'should take into account'. eg https://www.historicengland.org.uk/images-books/publications/eehbinsulating-solid-walls/"				
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 London Plan, format for viability statements that are transparent, robust and reliable with Section 106 agreements to allow claw-back	No	No	No	

			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.	No			No		No	
DM18								
A. a - g	We suggest in 'b' that reference is made to DM24							
A. h - i	We suggest that issues of safety, nuisance, etc should be in a separate clause on CMPs		In 'h', we suggest adding after 'harm to' in first line: 'neighbours or people passing over their land; to'		No			
В	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			
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					

DM44	No equivalent policy at first consultation		and vitality of economic activity essential for growth. Using Section 106 monies for training loses the floor space altogether and therefore unacceptable.				
DIVI44	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. We assume non-retail uses would not include conversion of shops to residential in a Conservation Area	No		No	
Haringey's Policy Map	Highgate's Archaeology: We note the discrepancy between the DM policy Map and the Urban Characterisation Study Map		The Highgate Society commends archaeological areas of significance as shown on the Map referred to in Highgate Neighbourhood Forum's Policy DH12				
	SINC on SA41 (Hillcrest) not shown		Map needs amending				
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. Suggestions such as those for Highgate Golf Club and Hornsey Lane						

Reservoir could be presumed to indicate a		
presumption in favour of development.		
How do they relate to DM9?	While we welcome these	
	studies, we consider that it is	
The Highgate Society has many	regrettable that they appear to	
reservations about the content of the	have been have been	
document for the Highgate Conservation	produced without any	
Area but we mention here :	consultation with CAACs,	
	amenity societies or local	
From SWOT Analysis under 'BAD':	people. It is not clear on what	
Mono-culture and exclusive	basis they have been included	
Old people and ageing population – not	on the Council website or	
mixed	referenced in the Development	
[The latter statement is not factually	Management Policies. We	
correct]	presume as unadopted	
	documents they are for	
From SWOT Analysis under 'CONSTRAINTS'	information only. We consider	
	they should be given little or	
Resistance from public to growth,	no weight in decision-making	
development and change	and references to them should	
	be removed.	
From SWOT Analysis under		
'OPPORTUNITIES':	The Highgate Society has been	
Covered reservoir on Hornsey Lane – not	advised that Thames Water	
needed by Thames Water	does require the Hornsey Lane	
Persuade older residents to down size	Reservoir operationally.	
and free up family sized housing [This is	Clarification on this point is	
not achievable through Planning Policy]	urgently required.	
Highgate golf course – is it really the best		
use of land?	The Highgate Society requests	
	that the Urban	
Some of these SWOT Analysis statements	Characterisation Study for	
would surely not pass Scrutiny and	Highgate be withdrawn	
Equalities tests		