



ENGLISH HERITAGE

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Date: 27th March 2015

Dear Sir/Madam

London Borough of Haringey

Haringey's Local Plan:

Alterations to Strategic Policies 2011-2026 (formerly the Core Strategy)- February 2015

Site Allocations DPD – Preferred Option – February 2015

Development Management Policies – Preferred Option – February 2015

Thank you for consulting English Heritage on the above Development Plan Documents.

As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Accordingly English Heritage welcomes the opportunity to comment upon the Haringey Local Plan have the following headlines comments to make.

Alterations to Strategic Policies

Managing Growth – Uplift in growth targets (housing numbers)

It is noted that there is expected to be a significant uplift in the delivery of new homes in the Borough's growth points, such as Upper Lea Valley and Tottenham Hale. However it is not clear what evidence has been used to support the expected uplift in new build within these areas. For example and as stated in our response letter (dated 9th March 2015) to the draft Tottenham Area Action Plan (AAP), the Tottenham area contains a rich historic environment with many designated assets. This includes nine conservation areas and numerous listed and locally listed buildings, plus a rich and interesting character which collectively should be used to inform the capacity of the area to accommodate the proposed quantum in development. By demonstrating that this approach has been undertaken, then clarity can be provided on the expected delivery of units in the growth points that reflect the principles of sustainable development as set out in the NPPF (paragraphs 7 to 10).

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Alt21 – Muswell Hill Area Neighbourhood (para 1.3.61)

We note that the proposed alteration suggest a reference to the provision of ‘modest growth’ on a ‘limited number of brownfield regeneration infill sites’. However it is not clear what evidence has been collected to support this change in policy. For example sites are being considered and what is meant by ‘modest’ growth?

Site Allocations

The following comments have been provided in the context of our previous letter (dated 7th March 2015) to the draft Site Allocation Development Plan Document (DPD). As previously expressed it would be helpful if the individual maps used in the DPD were supported by a ‘key’ to explain the various annotations, clearer street names and designated heritage assets annotations. It is noted that the maps provided this time around appear less clear in their orientation within the wider context. This information would then help us to assess the potential impacts of the site allocations. However it is clear that many of the points raised in our previous letter have not been addressed. For example our overarching comments relating to archaeology and the need to ensure that the potential archaeological interest of all sites is understood; and identifying heritage assets at risk, and referencing their future repair and re-use as part of a positive strategy for the historic environment, have not be taken on board in this latest version.

Before looking at the specific sites we would like to highlight that the prefixes and site names to each site allocation has been radically changed from the previous version. This is compounded by the change in the names of the broad areas. For example the Civic Centre has changed from WG1 to SA10, and no longer identified as being in the Haringey Heartland but within the Wood Green Metropolitan Town Centre. This change in the coding system and names hinders ours, and possibly others, ability to monitor the alterations made to the details of the site allocations following our previous comments. We would urge you to maintain a consistent approach throughout the development plan process in order to help consultees and interested parties engage effectively and efficiently with the Council. To do so will enable us and others to understand better the opportunities for development and policies on what will or will not be permitted and where (NPPF paragraph 154).

Within these constraints we would suggest that site allocations provide the opportunity to positively address heritage assets at risk, and help ensure that future planned developments respond to and reflect local character. This includes ensuring development proposals avoid causing unnecessary harm to the significance of heritage assets (including effects on their setting). For these benefits to be realised it is essential the evidence base for each site should include heritage assets where they may be affected, and analysis of any potential effects on their significance. In addition we would advise that the site allocations provide an opportunity to set out design parameters for new developments that respect the historic context of sites, including the significance of any heritage assets. Our previous letter provided detailed suggestions on this point and due to the changes of the coding of sites it difficult to ascertain whether these were integrated into this latest version. With this in mind we would wish to discuss further with you the details supporting the site allocations post the closing date of this consultation.

Development Management Policies

The following comments have been provided in the context of our previous response letter (dated 10th May 2013) on the Issues and Options for the Development Management DPD. The key headline comments on the current version are set out below:

- The DPD should be accompanied by clear maps that can help understand the application of key policies. For example policy *DM5 Siting and design of tall buildings* includes map (2.2) which seeks to illustrate the area considered by the Council as appropriate for tall buildings. The quality of the map provided in the web version of the DPD consultation document is poor and raises concerns that consultation on this issue is incomplete.
- Greater clarity on policy DM6 locally important views and vistas, in terms of the types of views identified by the Council in its evidence and their management.
- Further amendments need to be made to policy DM12 Management of the historic environment, so that it complies with the NPPF. Specific areas include issues relating to the potential harm, demolition and justifications for such actions based when balanced against public benefits of a scheme.

Further details are provided in the appendix to this letter.

We would like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where English Heritage consider it appropriate to do so.

In the meantime, once you have considered the details of our response, I would be happy to meet to discuss further on how this important document can be developed further. With this in mind please do not hesitate to contact me.

Yours faithfully

Graham Saunders
Principal Adviser - Historic Environment Planning - LONDON

Appendix: Haringey's Local Plan:

Site Allocations

Development Management Policies

2 Development Design

Para 2.2	In the last sentence we would suggest the following amendment to reflect NPPF paragraph 58; <i>....and avoid harmful impacts, especially to amenity of neighbouring buildings, and local character and heritage assets.</i>
Policy DM1 – Delivering High Quality Design	Amend the sub point a) to reflect NPPF paragraph 58 and supported by the Councils Urban Characterisation Study (UCS); <i>Make a positive contribution to a place, improving the <u>local and historic</u> character, and quality of an area</i>
Policy DM2 – Design Standards and Quality of Life	Amend the sub point A. to include the following additional requirement to reflect NPPF paragraph 58 and supported by the Councils UCS ; <i>contextual features and patterns of heritage interest</i>
Policy DM5 – siting and design of tall buildings	Part A of the policy refers to Map 2.2 in which to identify appropriate locations for tall buildings. However the quality of the Map in the DPD and available on the Council's web is of very poor quality to the extent it is not possible to neither identify the extent of the designation nor read the key. This lack of clarity is contrary to NPPF paragraph 154. Further consultation on this issue should be undertaken supported by clear readable maps. Amend part B point b) to the following to reflect NPPF paragraph 154 and to aid in the operation of paragraph 128: <i>Responds to the local and historic environment <u>including significance of heritage assets</u></i> We would also raise concerns with the use of 'landmark' as a possible justification for tall buildings – point d. We would suggest, reflecting NPPF paragraph 152 and its reference to avoiding adverse impacts to the dimensions of sustainable development, that the policy highlights the need to seek alternative options which can eliminate adverse impacts.
Para 2.27	It is noted that the definition for tall buildings in the Borough is identified as anything above 11 storeys in height. We are assuming that the UCS has been used to inform the suggested height threshold for the definition. However we would suggest that the height should be expressed in metres AOD (e.g. 39 metres as detailed in the UCS). In addition it is not clear why this figure was decided to be the benchmark for tall buildings as the definition in the London Plan states that 'tall buildings are those that are

	<p>substantially taller than their surroundings'. As detailed in the UCS the vast majority of buildings are up to 6 storeys (21 metres) with buildings above this height beginning to have a visual impact. Which suggests the threshold proposed is possibly too great. It would therefore be useful is to get further clarification on the figure decided as a trigger for this policy.</p> <p>If the threshold is proposed to be reduced then Map 2.2 that informs policy DM5 would need to be reviewed.</p>
<p>Policy DM6 – locally important views and vistas</p>	<p>We welcome the inclusion of a policy that considers the management of key views within and across the Borough. However the wording of the policy does not sit comfortably with the details provided in the UCS. For example the UCS refers to three types of views which we can only assume are being collectively called 'Locally important views'. However when considering the supporting text to the policy reference is made to the Mayor's strategic views as well as the UCS views. We would therefore suggest that the policy decides which views it seeks to manage.</p> <p>The policy wording especially the 2nd sentence should be strengthened and clarified. For example what is meant by 'disturbance to the locally significance views should be minimised...'? How will the views be managed, what evidence has been captured that provides a benchmark in which to measure the qualities of the view and how they will be managed against proposals for change? We are happy to work with the Council on developing this policy further.</p>
<p>Policy DM7 - Shopfronts</p>	<p>In general we are supportive of this policy. However we would suggest that when advising on the heritage interest of shopfronts, that the significance of the interest is considered in line with the NPPF paragraph 128.</p>
<p>Policy DM12 – Management of the historic environment</p>	<p>Part A of the policy should be re-worded so that it is more aligned with the NPPF paragraph 131, and the need for local authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation. The current wording touches on some of these elements but not fully.</p> <p>Part B of the policy also need so be carefully reviewed so that it does not undermine the policy framework provided by NPPF paragraph 132. Principally the principle that great weight should be given to the assets conservation, and the more important the assets the greater the weight. This point is not reflected in the current wording. In addition reference needs to be made to the setting of assets in the context of harm to or loss of significance through alterations or demolition. The current wording does not make this connection. Finally the reasons for justification for harm to or loss of significance to be supported should be further realigned with the NPPF. For example the different tests used in relation to the grade of heritage assets are not expressed sufficiently in the policy, to the extent that it could undermine operation of this aspect of national policy.</p>

	<p>In addition the potential public benefits that may support the justification for substantial harm or loss, as expressed by the NPPF are not fully captured in the policy wording. It is accepted that reference is made to the relevant NPPF paragraphs in the supporting text of the policy, but there are concerns that the wording in the policy deviate from the tests in the NPPF.</p> <p>Part D – we would suggest that the modern contemporary designs are sympathetic to the significance of heritage assets, not just the appearance.</p> <p>Part E – we would suggest that at the start of this section reference to the significance of heritage assets should be included.</p>
Policy DM14 – Façade retention	It is important to ensure which circumstances this policy will be applied. For example we would seek to ensure that the policy wording and supporting text highlights the need to understand the significance of heritage assets before considering facadism. This could include the use of a building or its layout which may contribute to the significance of, say a conservation area.
Policy DM24 – Residential Basement Development and Light Wells	We would seek to ensure that the policy makes reference to the significance of heritage assets as part of the test criteria.