



**Response by Highgate Society  
to  
Haringey's Draft Development Management Plan and Site Allocations Document  
(February 2015)**

**Generally**

The Society broadly welcomes the proposals set down below with the following caveats. It would also like to report that the maps produced to support some of the policies are of extremely poor quality rendering them virtually unreadable and, possibly, open to challenge by developers etc -, so assumptions have been made which may not be correct.

**DEVELOPMENT MANAGEMENT PLAN**

**DM1**

**Delivering High Quality Design**

This policy is welcomed but past experience has indicated that this is not always respected. There have been failures to implement findings of the Design Panel, concerns raised in local consultation have not always been addressed and there has been inadequate respect for the historic environment, in particular conservation areas and important open spaces, despite the existence of strong Conservation Area Appraisals. It is hoped that this policy will be fully implemented and enforced

**DM2 Design Standards and Quality of Life**

- DM2D – Secure by Design – unfortunately the rigid application of Secure by Design can lead to bland and forbidding schemes. Secure by Design should be used sensitively and should not override national and local conservation and design policies.
- DM2 E – What “Appropriate levels of daylight and sunlight” are should be expanded and explained
- Map 2.1 – The map is of poor quality and it is difficult to read in detail but this indicates that much of Highgate is urban in character. Whilst it is accepted that small areas ,mainly the lower parts of the Archway Road, are urban in character, most of the Highgate area is most decidedly not and the Society strongly objects to the designation of much of its area as urban. Large parts of Highgate, designated as urban, were built in the Edwardian and early 20<sup>th</sup> Century period, with wide frontage semi detached or linked semi detached houses and large gardens; the village itself retains a distinct and very definable country village character, and most of the remainder of the area is demonstrably suburban or even semi-rural. This definition should be altered to suburban to avoid applications for inappropriately high densities which would profoundly change the character of the area and cause demonstrable harm under the NPPF.

### **DM3**

#### **Privacy and protection from overlooking**

This is welcomed and the Society trusts it will be enforced

### **DM5**

#### **Siting and Design of Tall Buildings**

- Map 2.2 is difficult to read but appears to show two orange smudges in Highgate. The heights which these refer are illegible but these look to be referring to the area to the west of North Road and the Alymer Road shopping area. As these are adjoin listed buildings, are in conservation areas, or overlook historic parks, the Society believes this proposed designation to be inappropriate and potentially damaging, and that these two areas should be omitted from the map.

### **DM 6**

#### **Locally important views and vistas**

Map 2.3 is of poor quality and therefore not clearly comprehensible. However there appear to be few views indicated to or from Highgate, even though it is the highest point of the Borough. A number of important views have been identified in the Highgate Conservation Area Appraisal and these should be indicated in the map 2.3. In summary these include:

- the view from the top of Southwood Avenue looking east;
- the view from Townsend Yard looking east over the Bowl area;
- the view from Highgate High Street looking towards the city;
- the view from Southwood Lane looking over Kingsley Place south and the view from Archway Road into the city.
- The view from Cromwell Avenue towards Alexandra Palace

In addition there are a number of historic views into Highgate which need to be taken into consideration, including several views from Hampstead Heath towards St Michael's Church and towards St Joseph's Church and general views from Alexandra Palace towards Highgate. In addition, there is an important, of narrow, view from near the top of North Hill towards the Barnet/Totteridge Ridge.

### **DM10**

#### **Waste management**

Additional requirements need to be added here regarding refuse storage in conversions. Too often there is not enough space in the front amenity areas to accommodate the number of bins now specified by Haringey. When these are provided it is often at the loss of the front garden area or the outlook from ground floor and basement units. In these cases conversion should not be permitted.

### **DM 12**

#### **Management of the historic environment;**

The Society is concerned by the statement that heritage assets can be developed if *"The loss is essential to deliver significant heritage benefit ..... or public benefit such as affordable housing opportunities, which outweigh the significant loss.*

- Whilst the Society welcomes the provision of affordable housing, This contains wording which we feel is in contravention of the relevant clauses of the NPPF and which will lead to harm to heritage assets. It is not within the NPPF to suggest that affordable housing opportunities are of such significant public benefit that they can outweigh the loss of a

heritage asset. Indeed, the policy, as worded, clearly suggests that any and all heritage assets may be demolished if the objective is to provide affordable housing. Certainly it could be interpreted thus by a developer. The policy, as worded, is both damaging and contrary to national policy for the protection of the heritage. This cannot be its intention. This clause must therefore be amended, and strengthened, with the word “*substantially*” inserted before the word “*public benefit*” and the words “*such as affordable housing opportunity*” removed.

- We are, nevertheless, glad that Haringey is extending this test to ‘heritage assets’ in the broader sense (which may include locally listed buildings or those which positively contribute to CAs), but the strong presumption against harm/loss of designated assets, eg. listed buildings and conservation areas, needs emphasis here. The plan would benefit here from quoting para 132 of the NPPF (omitting references to wrecks, WHSs and battlefields as irrelevant here).
- The development on backlands section should be strengthened. The Society would ask that the following wording be inserted. “*In addition to above, applications for new development or alteration works affecting a heritage asset or its setting, including subdivision of plots, infill and backland development, would only be granted where they preserve or enhance the character, appearance and setting of the asset if it is within a Conservation Area.*”

#### **DM 14**

##### **Housing Supply**

The Society supports the Council’s commitment to resisting the loss of existing housing, but the exemption for equivalent floor space only does not take into account the loss of specific units, and if applied carelessly could lead to net losses of homes.

#### **DM 15**

##### **Housing Mix**

As highlighted in our comments on the Housing Strategy (1st February, 2015) we are concerned by the Council’s determination that all developments be fully mixed in terms of tenure, size, occupancy profile, etc. This policy ignores the natural choices people make to live in areas of a particular demographic or which provide particular services. We welcome the Council’s pledge to have regard for “individual site circumstances” (A.a), but urge that consideration of these circumstances be placed at the forefront of planning for a housing mix, and not be merely auxiliary to a programme of establishing preordained groupings.

We are equally sceptical of the intention to seek “robustly” to provide affordable housing in areas where it is under-represented: the paramount objective should be to provide that housing where it is needed and in demand. Affordable housing is currently managed by RSLs but the time may come when buy-to-let owners and or investors provide it. Otherwise, such ventures are likely to attract absentee landlords for buy-to-let purposes – experience of the Highgate market, in particular, leaves us in no doubt that this would be a major issue here - and therefore defeat the underlying principles at hand.

#### **DM 16**

##### **Housing Design and Quality**

- We of course support the drive for quality of design in all new housing developments and look forward to contributing along with other relevant community and amenity groups toward the dialogue that will inform such

projects. However, the definition of “high quality”, particularly in terms of exterior design, is highly subjective, requiring detailed knowledge of the character of an area. There should be a commitment to meaningful pre-application discussion with the local community on design issues.

- We are particularly supportive of the initiative to rigorously control the design of extensions, especially with regard to historic buildings and heritage environments, and trust that it will be implemented emphatically.
- We do not agree with the intention outlined in paragraph 3.11 to support generally the adaptation of homes by enlargement or extension to meet changing needs of the residents. Particularly in Highgate, such a programme will inevitably lead to the erosion of the supply of smaller family homes, and their replacement by increasingly larger ones, to the point that the standard property stock within a neighbourhood is permanently distorted beyond the requirements of new buyers or tenants. These larger houses will eventually then only be suitable or viable for conversion to HMOs or subdivision, which is contradictory to the Council’s stated aims in DM 20 (see below). The policy will also inevitably lead to the disappearance of garden land, contrary to national policy.

#### **DM 17 – Affordable Housing**

- The Society is uneasy about phrase “negotiating the level of affordable housing” in paragraph D as it implies the ability of large developments to avoid their obligations through clever manipulation of viability assessments and valuations.
- We are also not clear on why the decision has been taken to ignore the findings of the 2014 SHMA which identified the significant shortfall in Borough housing was of 1- and 2-bedroom dwellings. The Council’s apparent resolve not to provide quality developments of this type of housing in favour of much larger houses is bound to lead to sub-letting/subdividing of existing housing units or a rash of HMOs as the target group of residents is not being catered for by the Housing Strategy.

#### **DM 18 – Self-build and Custom Build Housing**

We strongly urge the Council to adopt and enforce a strict definition of “self-build” housing, such that it does not include large scale demolition and rebuilding projects for private ownership. These are highly detrimental to the infrastructure, the streetscape integrity and the local amenity of nearby residents, and they bear no relation to the type of schemes originally envisaged by those authorities seeking to offer alternative routes to affordable home ownership. The term “self-build” and all of its attendant subsidies and support systems should only apply to the construction of entirely new housing stock on agreed sites, and realised by the owner/occupier. Our comments above on design and on national and local conservation policies are particularly applicable here.

#### **DM 19**

##### **Specialist Housing**

- It is unclear from this policy how an “established need” for new special needs housing will be identified, as the term implies the pre-existence of such housing, and therefore allows little manoeuvring room for provision of new projects in new areas.

- Regarding provision of Secured Accommodation, we would highlight the fact that stated pledges to safeguard neighbourhoods from consequent adverse impacts on local amenities, etc., can in fact only be ensured through the Social Services, parole organisations, the Judiciary, police, etc., all of which bodies are all well outside the control and management of the planning department.
- Moreover, it is difficult to see how the supply of these types of specialist housing can be market led, as they are generally not perceived by developers as a profit-making enterprises.

## **DM 20**

### **Residential Conversions**

- We wish to reiterate our point that the Council's resistance to permitting residential conversions is not in keeping with its policies of a) allowing continued extension and enlargement of smaller family homes and b) opposition to the building or development of 1 and 2 bedroom dwellings. These two latter policies will inevitably lead to a diminishing of smaller dwellings with a resultant increase in exactly the type of property that is most likely to be sub-divided and converted.
- We are not at all clear on how the existing garden of a converted property can be available to all residents, as the Council ideal is to have it completely parcelled out, which ultimately would degrade it as a green or open space.

## **DM 21**

### **Houses in Multiple Occupation**

While the Council clearly recognises the potential of HMOs to lead to a deterioration of amenity and local character, we come back to our point made above and previously that it is better *not* to allow the overdevelopment of sites in the way of enlargement and extension, which could easily lead to a growth of large properties, ill-suited to their neighbourhoods, and consequently only fit for subdivision

## **DM 22**

### **Residential Basement Development and Light Wells**

The Society enthusiastically welcomes the nascent attempt to draft and implement a Borough-wide basements policy and we would like to be involved at all stages of its development in order to present our findings where relevant, and our experiences where beneficial. We are, however, at a loss to see how a basement could safeguard the structural stability of the property, and therefore be permitted, as outlined in paragraph A.a. Furthermore, no basement construction can be carried out *without* flood risk, adverse impact on amenity of neighbours, damage to townscape trees and significant increase in traffic congestion during construction. Therefore, we can only presume that these parameters are fully flexible, and urge the Council to lay down specific and unfringeable restrictions on basement excavations.

Camden Council (within whose area part of Highgate falls) is currently in the process of accepting strong basement rules modelled on those now in force in Kensington and Chelsea, and we would strongly urge that Haringey adopt a policy modelled on that.

## **SITE ALLOCATIONS DPD**

### **Sites SA 42-47**

The Society fully supports the comments submitted by the Highgate Neighbourhood Forum concerning the Site Allocations SA42-47. It would particularly like to

underline SA45 and the response from the Highgate Bowl Action Group and would like to request that the points raised in their response are fully taken into consideration. In particular it asks that the green dotted line is extended to include the Harington Scheme. Our major concern is that although this is currently zoned as agricultural land, it is not included within this line, leaving it open for housing or other development which, whilst resulting in short term gain, would fundamentally threaten the existence of the scheme and thus deprive not only the Haringey but wider areas of a necessary and useful facility.