

Policy	Comment	Suggested Action
SA 47 Hillcrest		
General comments	<p>Site Allocation is not Supported by the Community</p> <p>The proposals for Hillcrest are not supported by the Hillcrest community or by the wider Highgate community. (See evidence - HRA survey – sent as hard copy to accompany these comments)</p>	<p>We suggest removing the site Allocation for Hilcrest (SA47) from the site allocation DPD.</p>
	<p>Site Allocation is not supported by the Highgate Neighbourhood Forum and the Neighbourhood Plan</p> <p>The NPPF requires that (155) <i>A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</i></p> <p>Hillcrest is within the area of the Highgate Neighbourhood Forum (HNF).</p> <p>HNF contributed significantly to the previous draft of the Site Allocations DPD through the 'Call for Sites' process.</p> <p>Hillcrest was not included as a site by HNF because Hillcrest is not believed, by the forum, or the Highgate Community, to be a suitable site for sustainable development.</p>	<p>We suggest removing the site allocation for Hillcrest and seeking a collective vision of development priorities for Highgate in consultation with HNF and the affected communities.</p>
	<p>Hillcrest's communal areas have been designated as a 'Local Green Space' in the Neighbourhood Plan (p53 – Open Land on Hillcrest housing Estate, p54 – Southwood Lane Wood).</p> <p>These designations have been made in line with the requirements of NPPF paragraph 77.</p> <p>The NPPF requires that: <i>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.</i></p> <p>Land protected in this way is exempt from the presumption in favour of sustainable development that underpins the NPPF.</p>	<p>We suggest removing the Site Allocation and supporting the allocation of this land as 'Local Green Space' in the Highgate Neighbourhood Plan.</p> <p>We question the council's decision not to allocate land as purely green space and question the deliverability of the 'green grid' approach, especially in the case of Hillcrest. We call for this evidence to be produced.</p> <p>We call for the council to include in the strategic policies document a policy which supports the rights of communities to designate local</p>

	<p>The Planning Advisory Service recommends that (to be NPPF compliant) Local Plans should include a policy which</p> <p><i>... Would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts</i></p> <p>Although Haringey's Local Plan seeks to protect open space through preventing its net loss, the Local Plan does not contain a policy that enables the designation of local green spaces, or offers their protection in line with the policy for green belt.</p> <p>Haringey's interim Sustainability Appraisal for the Sites Allocation DPD, recognises that Hillcrest fits the 'rules' for allocation as an 'Open Space' (it is within an area of deficiency). (SA table 10.1)</p> <p>The council's options appraisal concluded that the council would not allocate sites purely for Open Space. The options appraisal recognised that there were negative effects associated with this decision, and noted that there are 'theoretical opportunities to do more to reduce open space deficiencies'</p> <p>Allowing the allocation of Local Green Space would help the council reduce these deficiencies while retaining a commitment to the presumption in favour of sustainable development.</p> <p>The council have decided not to designate sites purely for open space, but must allow Neighbourhood Forums to designate land in this way.</p> <p>Hillcrest open land fits the criteria for designated open space both in the NPPF and in the council's own interim SA.</p>	<p>green space as laid out in the NPPF and the Localism Act.</p>
	<p>There is no evidence of the viability/deliverability of sustainable development on this site</p> <p>PRP architects for Haringey Council have conducted a raft of technical surveys on this site. These can be viewed at: http://www.haringey.gov.uk/housing-and-planning/housing/housing-consultations/hillcrest-estate</p> <p>These surveys have revealed the site to have a number of severe physical restrictions, which have led to the council to revise their projected units for this site downwards. (From an original ceiling of 90 units, to a ceiling of 40)</p>	<p>If this allocation is retained, we suggest that financial viability is presented as part of the evidence base prior to the site going forward for examination.</p> <p>This viability should include realistic assessments of the costs associated with retaining or replacing of parking, amenity space and the physical complexities of working within a contaminated site that is surrounded by protected woodland.</p>

	<p>This calculation has not taken into account the financial restrictions and viability of building on such a complicated site, but are merely a reflection of units that would fit within the physical constraints.</p> <p>This allocation has been made with no evidence of the financial and physical viability of the proposals.</p> <p>Technical surveys have shown land contamination, difficult topography, footprints and building heights limited by physical constraints, the presence of protected species (bats), restrictions due to the conservation area and the proximity of heritage assets (listed buildings) as well as the need to replace lost parking and amenity space.</p> <p>From the surveys already conducted we are aware that any scheme here would be limited in scale and expensive to realise. It is far from certain that its benefits would override its costs.</p> <p>The allocation cannot be considered sound unless robust financial appraisals are produced prior to the allocation being put forward for inclusion in the plan.</p>	
PTAL rating	The official PTAL rating for the site is 1b, not 2 as stated in the allocation	Correct the PTAL rating to 1b
Comments on Site Requirements		
'The buildings will be placed in the gaps which 'exist between existing buildings on the site'	<p>This statement is inaccurate.</p> <p>The Council has proposed 3 development sites on the estate. (Fig 1). These are not gaps, but amenity spaces.</p> <p>The proposed Sites are the estate's main car park, an open space used as a recreation area (also part of the Southwood Lane Wood designated SINC), and a children's football pitch.</p>	Describing the proposed development areas as 'gaps' is misleading – we suggest that it is changed to include a description of the sites and a map.
	<p>Loss of green Space</p> <p>Policy DM26 of the Development Management Plan states <i>The council will not grant planning permission for proposals for development that would result in the net loss of open space, unless an assessment has been undertaken which shows the open space is surplus to all the functions that an open space can perform.</i></p> <p>The development proposals contained in this site allocation would result in a net loss of well-used and valuable open space (a football pitch and a recreation area that is part of the designated SINC). These areas are not</p>	<p>If the allocation is retained it should include an obligation to replace lost green space and amenity space with equivalent new spaces of equal size and fit for the same use.</p> <p>In particular, we would like to see a commitment to reprovide a football pitch on the estate and accompanying evidence to show how this would be achieved.</p> <p>Loss of space from the SINC area should be avoided.</p>

	<p>surplus and development would therefore run contrary to DM26.</p>	<p>Similarly we would look for a commitment to replacing lost car parking spaces and a physical and financial appraisal of how this could be achieved.</p>
	<p>Hillcrest is in an area of deficiency for small local parks and amenity green space. (Haringey Open Space Study 2014)</p> <p>Hillcrest is not within the catchment of any local parks or amenity green spaces. There are no other parks, open spaces or amenity spaces of any classification within reach of Hillcrest.</p> <p>Hillcrest is surrounded on all sides by major roads and there are no parks or open spaces outside of the estate that can be reached without crossing major roads.</p> <p>Highgate Wood is not accessible to primary school age children without an accompanying adult.</p> <p>Highgate Wood is at the bottom of an extremely steep hill and is not served by public transport from the estate. Highgate Wood is not accessible to people with mobility difficulties.</p> <p>Removal of green spaces would produce a negative impact on health and community cohesion for residents on the estate. Children and people with physical disabilities may be more severely disadvantaged.</p>	<p>Overall this site allocation should seek for a net improvement of the living environment for Hillcrest residents.</p> <p>Negative impacts of the health of residents and particularly children should be avoided.</p> <p>Evidence to demonstrate this should be provided.</p>
	<p>Hillcrest already suffers from overcrowding and lack of amenity space, relative to the rest of the area</p> <p>Hillcrest falls within the most deprived 20% in the country on the 'Index of Multiple Deprivation – Living Environment Indicator' (the same category as most of Wood Green and Tottenham)</p> <p>Hillcrest falls within the most deprived 25% in the country for access to private gardens (Open Space Study, Fig 4.16)(Hillcrest has not private gardens) yet it is adjacent to an area where 75% of households have private gardens).</p> <p>Proposals that seek to increase the density of the estate and decrease its 'greenness', access to nature and amenity space will lead to a further 'gap' between the least and most deprived in this area. And. As identified in the 'Marmot Review' – these environmental equalities are a major predictor of health inequalities.</p>	<p>Proposed development presents a risk of deepening environmental inequalities in this ward.</p> <p>We have qualitative evidence of the importance of the amenity spaces and SINC to the health of residents and of the inaccessibility of the nearest 'off site' open spaces to our most vulnerable residents. We call for evidence that shows this could be offset to produce an improvement in living environment for existing residents.</p>

	<p>Hillcrest was identified in Atkins 2008 as being in an area of deficiency for access to sports pitches.</p> <p>Children on Hillcrest have no access to kickabout areas, sports pitches or MUGAs within 400m of the estate.</p> <p>The availability of sports pitches, kickabouts and MUGAs compares unfavourably with the East of the Borough.</p> <p>The amenity spaces on Hillcrest have been described as 'poor quality', by contractors for the council, but they are not felt by residents to be so. (see accompanying residents' survey)</p> <p>The amenity areas are multi-functional and flexible to the needs of the individual using them. They offer doorstep play for the very youngest and kick about for older children as well as providing access to nature and recreation/social and dog walking space for adult residents.</p> <p>Hillcrest residents believe that any enhancement of amenity spaces should be community-led and not part of a 'redevelopment scheme'</p>	<p>The Atkins study has not had a detailed update. We would like to see the latest information on availability of sports facilities for our ward.</p> <p>We would like to see a policy that seeks to address the inequality in provision of council-run, publically available sports pitches between the East and the West of the Borough.</p>
<p>'Height will be limited to 7 storeys on the site'.</p>	<p>Rights of Light/Privacy and Overlooking</p> <p>In December 2014, Haringey Council and PRP architects produced a constraints map of the proposed development site. They concluded that rights to light for existing residents and the neighbouring properties would restrict development to 3.5 storeys on the estate.</p> <p>Gillian Horn of HRA has also produced a constraints drawing which illustrates the maximum compliant height for buildings on 3 sites on the estate (attached)</p>	<p>The allocation should be revised to take into account the evidence from the restraints drawing, with the number of storeys revised downwards and the number of units revised accordingly.</p> <p>This allocation should include a commitment to respect privacy/overlooking and rights of light as laid out the management policies. In addition, evidence should be provided to show the impact (on the rights of light) of existing hillcrest flats and on neighbouring properties on the The Park, St George's Terrace and Southwood Lane.</p>
<p>'A new pedestrian exit from the site onto Southwood Lane should be considered'</p>	<p>New Exit</p> <p>There is already an exit from the South of the site onto Southwood Lane.</p> <p>The council has shown us proposals for a new pedestrian exit behind Wavell House (to the North of the site), although the latest versions of the plans did not include this option.</p> <p>Restrictions to the creation of this exit</p>	<p>The inclusion of this idea in the allocation should be backed up with evidence of the likely impact on the SINC area, the bats, light and noise pollution on the estate and the impact on the conservation area setting.</p> <p>A cost appraisal for the new exit should also be presented as part of the deliverability/viability</p>

	<p>include:</p> <ul style="list-style-type: none"> - The topography of The Bank – it is very steep. New access would have to be stepped access and it would be impossible to create a disabled route via a direct pathway, the winding pathway required to mitigate the slope would be extremely destructive to the SINC protected woodland. - The sense of enclosure of the site. Hillcrest is a unique estate in that it is encircled by mature woodland providing screening from neighbouring properties and from Archway Road. Opening up the site would have a detrimental effect on the appearance, character and feel of the estate and on its conservation area setting - Trees and wildlife. Creation of a new path would lead to loss of trees from this significant and protected woodland, it would also change levels of light and noise within the woodland and would impact on its wildlife and overall ecology. - Bats have been recorded foraging in the woodland. Any tree work or changes to lighting would have to include an investigation into the impact on the bats. 	calculations.
Comments on Development Guidelines		
'The SINC around the edge of the site should be enhanced through any development'	The SINC area extends into the estate and all of the SINC should be enhanced by any development. It was recognized in the 'Natural Solutions' report that public access to natural sites can provide a focus for community interaction. we support the protection of the Woodland strip but also seek to protect and enhance the SINC area within the estate which has potential to allow access to nature and a community interaction point for our community.	We welcome the commitment to enhancement of the SINC (Southwood Lane Wood) and ask that the guideline is extended to include the SINC areas that lie within the estate.
'Particular Sensitivity should be assigned to how the SINC creates a pleasant rural feel along Southwood Lane'	The SINC also contributes to a pleasant rural feel along The Park and the edge of Park Walk.	We welcome the acknowledgement of Southwood Lane Wood's importance to the estate's neighbours and the neighbourhood setting.
'Any entrance to the North should carefully consider the impact on the designated SINC that surrounds the	The impact on the SINC should also be considered when siting buildings close to its boundaries.	Include a commitment to protect and enhance the SINC during any construction and to avoid building within the root zones of the SINC trees or building in areas where tree canopies

edge of the site.'		would have to be reduced.
The block in the North West corner should be of reduced height...5 storeys will be suitable here.	<p>As mentioned above the restraints drawings indicate that buildings of more than 3.5 storeys will fall outside privacy and overlooking envelopes. At our last meeting with the council, the maximum height of any new block was given as 3.5 storeys.</p> <p>This 'North West' site is currently the estate's football pitch, which, as discussed above, cannot be lost without provision of an equivalent area on site.</p>	<p>We welcome the preservation of the views of Highpoint, but ask that the height of any block is reduced to a maximum of 3.5 storeys in line with the privacy and overlooking evidence.</p> <p>Include a commitment to re-provide a games and kick about area within the estate</p>
Additional Guidelines	<p>Parking – one of the council's proposed sites is the estate's main car park. The council have conducted a transport assessment which we have not been able to see but expect it to show that the estate already has a small deficit in available parking by the standards of the London Plan, this deficit would be significantly worsened by proposals that add dwellings and remove parking spaces. Hillcrest has a low PTAL and so could not support car free development. In addition Hillcrest is surrounded on all 4 sides by roads that are covered by Highgate CPZ and so it helps to alleviate pressure on parking in the village core, the Archway road and around the schools, churches and synagogues. It is also a well-known parking spot for tradespeople working in the area. Increased parking stress on Hillcrest would have a knock-on effect on the whole area and this would have to be very carefully assessed.</p> <p>Trees – Hillcrest includes many mature specimens within the estate grounds. Loss of trees, building in tree root zones or tree canopy reduction should be avoided</p>	<p>A guideline should be included to deal with parking.</p> <p>Existing parking spaces to be replaced at the same levels and additional parking spaces provided in line with the London Plan. Schemes to control parking on Hillcrest would have to be carefully assessed within the context of the wider area.</p> <p>A guideline should be included laying out the approach to the trees on the estate.</p>