

Hillcrest Residents' Association – Comments on amended The Amended Draft to Haringey's Local Plan
 –Alterations to Strategic Policies and Development Management Priorities

Policy	Comment	Suggested Action
Alterations to Strategic Policies 2011-2026		
Alt 21 1.3 Para 1.3.61	<p>The Council had originally identified the west of the borough to be unsuitable for major development. This amended draft describes the 'suburban brownfield' development opportunities that have now come forward.</p> <p>The policy does not make it clear which of the new sites are included in this policy description, but we contend that Hillcrest (HA47) does not fit the description of a brownfield site and that its development as an infill site would mean loss of green space and amenity space that is currently a community asset and could also have a negative impact on the appearance of the estate and its positive contribution to the Highgate conservation area.</p>	<p>It is not clear which sites are included in this policy.</p> <p>Hillcrest is not a brownfield site and is not viable for infill without damage to the conservation area and net loss of green space.</p>
Alt 45 3.2 Para 3.2.1	Sustainability of development is a key requirement of the NPFF and an aspiration for new development. This requirement should not be removed from new developments.	The sentence 'and are sustainable for current and future generations' should be reinstated.
Alt 47 3.2 policy SP2 Housing	These revised targets are unrealistic and likely to lead to poor quality development if pursued.	
Alt 49 3.2 Policy SP2 Housing	<p>The reduction of the affordable housing target to 40% of habitable rooms will have a negative impact on the council's stated aims to provide affordable housing and provide mixed and balanced communities.</p> <p>On Hillcrest the 60/40 ratio would tip the balance on the estate towards market value holdings (at present there is a ratio of 40% leasehold and 60% tenanted properties). In effect this would force social tenants into a minority and could also have an inflationary effect on property values on the estate (by making it more 'private' and therefore more 'desirable') thereby moving affordable ownership further out of sight.</p>	Maintain the target at 50% affordable housing and continue to negotiate viability across individual schemes.
Alt 51 3.2 Policy SP2 Housing	We support the retention of policy SP2 (7)	Retain SP2 (7)
Alt 53 3.2 Policy SP2 Housing	<p>The inclusion of Hillcrest in this list is unjustified. Hillcrest is not a regeneration site and does not meet the criteria of being in a wider regeneration area or of being 'most at need'.</p> <p>Hillcrest is not a regeneration Site</p> <p>In Haringey's Housing Investment and Estate Renewal Strategy, (November 2013) Hillcrest is listed in Appendix B as a 'Medium Sized Site for Consultation'. Section 3.3 of the strategy goes on to recommend that.. "<i>consultation is started with the affected residents, including their involvement in the selection of masterplanners and/or architects to identify the best solutions for renewal/regeneration.</i>"</p> <p>However, this recommendation was not followed. Haringey Council had already appointed architects,</p>	Remove Hillcrest from this list.

carried out a feasibility study and commenced technical surveys before they began a programme of meetings with Hillcrest Residents in June 2014. At this time it was the council's intention to treat Hillcrest as an 'infill site' requiring statutory consultation only. Hillcrest residents challenged this apparent failure to follow the process laid out in the Housing Investment and Estate Renewal report and in an email to Hillcrest Residents (19th November 2014) LBH's Michael Kelleher (Head of Sites and Investment) confirmed that Hillcrest was not a regeneration site.

Email from Mr Kelleher, dated Nov 19th 2014 (my underlining)

"...With regard to the Cabinet decision in November 2013, as you rightly quote, Cabinet agreed to include "residents...in the selection of masterplanners and/or architects to identify the best solutions for renewal/regeneration." With regard to infill sites the report sets out the council's intention to proceed to planning, consulting with residents as part of a statutory planning process only. It is important to note that Hillcrest is NOT a site subject to renewal or regeneration, and is in fact an infill site offering the opportunity to build new housing in order to meet much needed homes for local people. It is my understanding that Hillcrest was added to the 'medium' sites list merely because of the size and potential capacity of the site and in recognition that residents would be best involved earlier on in the process that that applying for other infill sites. This appears to be where confusion has arisen in the treatment of the initial studies carried out in this area."

The justification given in Policy SP2 of the Local Plan for including an allocation for Hillcrest is therefore false. Hillcrest is not a regeneration site and its inclusion as a site allocation cannot be justified by policy SP2 *The Regeneration of Haringey' Council Estates.*

Hillcrest is not 'most in need' (of renewal, regeneration or improvement)

In February 2014, Hillcrest Residents' Association carried out a survey of the occupants of the 116 flats on the estate. Tenants and Leaseholders were asked if they supported the redevelopment of the estate and what, if any, improvements they would like to see. Responses to the surveys showed a general satisfaction with the estate and some desire for upgrade of communal areas (which is being addressed by The Decent Homes programme).

There is room for improvement of Hillcrest's communal outside spaces, but the active residents and residents' association on the estate are keen to tackle this with appropriate fundraising and community effort.

The respondents to the survey showed general satisfaction with the estate, commenting on its peacefulness, its pleasant aspect and its trees and wildlife. The most frequently suggested improvements were to the standards of maintenance and cleaning rather than to the estate itself. I have sent these survey responses (with personal data removed) to you as hard

	<p>copy. Please consider them as responses from Hillcrest Residents to the principle of development on the Hillcrest Estate.</p> <p>The estate is currently undergoing major works under the Decent Homes programme which will address many of the issues and desires for improvement raised in the survey.</p> <p>Hillcrest is a well-designed estate that has a mixed and balanced community of tenants and leaseholders and low levels of anti social behaviour. It is not 'in need' of regeneration, renewal or improvement and its inclusion as a site allocation cannot be justified on these terms.</p>	
Alt 62 3.2 Para 3.2.23	The target should be maintained at 50% and the requirement for schemes of fewer than 10 units to provide 20% affordable housing should be reinstated.	
Alt 64 3.2 3.2.29	Regeneration should not be used as a justification for demolition, intensification and private sale of Haringey's council stock. The council must explore creative, community-led options for estate improvements and upkeep and seek to support and maintain existing social housing communities.	This policy which supports the blanket intensification of social housing estates in the name of 'regeneration' should not form part of the strategic policies – Estate regeneration should be assessed on a community-led, case by case basis and should not be included as part of a wider housing strategy.
Development Management Policies		
Policy DM3 2.21	How would this policy influence privacy and overlooking requirements in an estate environment, where there is often no defined 'front' and 'back'? it could be argued that overlooking windows on an estate face each other across a public space, however, this is not the same as facing across a street and the privacy requirements should still be applied.	Suggest rewriting the policy to clarify the definition of 'public space' and include a commitment to protecting rights of light and privacy on housing estates.
Policy DM3 2.21	In the case of infill development 'new' overlooking is of a different quality to planned overlooking in new build developments.	would like to see a policy offering additional consideration of overlooking in the case of infill development.