

28 July 2016

Dear Ms Thorby

The enclosed photographs & statement support the need for revisions to the requirements and guidelines for the identified sites in order to protect the highly individual character of my neighbourhood. Aspects of Highgate preserve a really old suburban - almost rural – feel. This is being placed at ever-increasing risk by the Council. While I recognise the pressures on Haringey to bow to the demands of developers, they need to develop a better instinct for preservation of our valued heritage.

This statement includes my replies to the Council's recently published responses to my representation. And photographic simulations of how the character of the area is likely to evaporate in the ensuing "blandscaping".

- a) The Plan may aim to positively facilitate Borough-wide redevelopment but the generalised approach would lead to highly negative local outcomes including the loss of Conservation Area neighbourhood parks/gardens and views.
- b) The plan does not justify (because it does not even mention) the loss of certain local Highgate public green space and open MOL views. Responses so far suggest the Council does not think these aspects of the Conservation Area are worth protecting for future generations.
- c) Some simple and straightforward revisions are needed to produce a Plan which strikes a fair balance between the need for change and the need for preservation of our local area's best features.
- d) It has not been shown that the proposals identified presently accord with NPPF or London Plan Policies - see earlier representation and pages 11&12 below.

Yours sincerely

Tony Rybacki

Page 2 & 3 Re the Inspector's stated area of interest

Pages 3 – 11 Photos of Public Space & Views at risk

Pages 11&12..... Reply to the Council's latest responses

Pages 12-15.....Site Inventories – simulation

Q: "Whether the site requirements and development guidelines, in combination with the development management and strategic policies, would be sufficient to protect the character of the area?"

A: Unfortunately, the answer is "no".

What the documents fail to say. Locally-sensitive limits to new building heights have not been set. The existing use of land scheduled by the Plan for redevelopment is being ignored (as in SA39) or unfairly described (as in SA 44). If the facts are not accurately stated, how can sound conclusions be reached?

The lack of limits gives developers excessive leeway. The site guidelines are subjective and vague. Every architect can argue with complete sincerity that their new apartment block is an inherently beautiful, big object and makes a "positive contribution" and "enhances the appearance" of the area. But site context is crucially important and easily overlooked. The negative impacts of an oversized development cannot be designed away and result in the permanent loss of irreplaceable character and amenity.

Everyone wants to see good new housing on **genuinely redundant** Highgate sites, but with appropriate specific protection. A sound Local Plan cannot reasonably advocate the loss of existing public parks (eg SA39), open spaces (eg SA 44), or fail to protect green views that give the Conservation Area a unique visual appeal (SA38&43). It is wrong to draw up plans with avoidable negative impacts.

Another problem arises from the contradictions between the Strategic Policies (SP11) and the "Alterations" to Strategic Policies.

For example, the "Alterations" include the "*Highgate neighbourhood character summary*". This summary advocates many large-scale redevelopments that are in open conflict with existing Strategic Policies. It is clear from the extended list of candidate sites that Council is keen to see new tall buildings in the area.

In order to ensure an adequate level of future protection, the Local Plan should **positively rule out** the destruction and overbuilding of Coleridge Gardens and Hillcrest amenity space. Likewise the Plan needs **explicitly to protect** public views of Highgate Wood and Queens Wood. At other redevelopment sites, the plan should **specify neighbourly height limits**. These matters cannot just be treated as "detail" - to be sorted out later on; more clarity is needed now.

These are hardly unfair or unreasonable "asks" – they represent sensible and positive clarifications that will prevent a great deal of avoidable future conflict.

If local open spaces go unprotected, and if other appropriate site limits are not established within the Local Plan, the resulting redevelopment will damage the neighbourhood's look, feel and character forever. To introduce unambiguous specific local protections in the Site requirements and guidelines would make a vital difference in ensuring the eastern side of the Conservation Area retains its unique character.

Below: Photos of Public Space & Views at risk - SA 39, 44, 38 & Addendum re 43

SA 39 -Coleridge Gardens on Archway Road - calm and shade, as found on the hottest day, 2016 The Local Plan fails to mention its existence yet many locals have no garden



Revised Statement, Site Allocations DPD, MATTER 3 - SITE SPECIFIC ISSUES, Highgate
Neighbourhood/Character/Representor 22/ Mr Rybacki



The gardens provide a welcoming green space and open views of the wooded junction - a break from the road. The missing benches need to be replaced and the footway repaired. There is great scope here for creative further planting/ new beds & tree planting.

The public's use of the gardens goes back many decades (see old photo below). Very many local flat-dwellers don't have gardens.

This Garden should be expressly excluded from any adjacent redevelopments



SA 44 –Hillcrest Estate – the Local Plan sees “gaps” to be filled between the buildings; but residents & visitors see garden and valuable green amenity space



SA 38 Archway Road – historic woodland views over the builders’ yard save the area from dreary monotony. Views will be lost unless more actively protected than the present plan wording. Without the wooded backdrop, the distinctiveness of the location drains away.



SA 43 – addendum

A great deal of care was taken in the past by Haringey planners and architects to ensure that developments on and around this site are sensitive to the historic ancient woodland setting. The new Local Plan requirements and guidelines do not show an equal sensitivity or interest.

Haringey can not see what is worth conserving here, saying in response: “it is not considered that the views from Muswell Hill Rd, as they are at present across the site, are sufficiently valuable to protect”.

If no limits are set, the Plan will end up transferring the public benefit of the beautiful historic views (see photos below) to the developer/s of the new, larger and taller, apartment blocks that the Council wants to replace existing buildings.

SA 43- Beautiful existing views from Muswell Hill Road show the scale of the woods, the height of the location and are far-reaching particularly in Autumn and Winter



SA 43 - Valuable ancient green views will be lost unless development is better controlled than the current Plan provides







The present DPD offers no meaningful constraints to insensitive redevelopment of the conservation area site.

The Council' says that to use the height of existing sheds as a guide to the scale of new development is "onerous".

But adequate restriction is necessary to prevent the loss of public amenity.

SA 43– The historic open view of Queens Wood from Muswell Hill Road creates the neighbourhood’s special character. A new two storey terrace along the roadway would obliterate this view (the earlier DPD talked of “limiting” development to 4 storeys)



Reply to the Council's responses (to Site Allocations DPD representations)

(Refs to: http://www.haringey.gov.uk/sites/haringeygovuk/files/consultation_statement_-_pre_submission_of_site_allocations_dpd.pdf)

RSA 99 -Tall/taller/large/larger buildings

In RSA 99 (p223) the Council argues that any building less than 10 storeys is not "tall" and there will therefore be no "tall" buildings in Highgate. It says "taller" buildings will be allowed everywhere including conservation areas. "Large" buildings (defined as two storeys higher than the surroundings) will also be allowed (it is unclear where). This latter, "large" definition would lead to a progressive bidding-up of new building sizes – from three storeys to five; from five storeys to seven, and on to nine storeys. So what is a taller building? Is it anything below 10?

Common sense would judge a five, six or seven storey building *tall* in the context of a two/three storey neighbourhood. If the neighbourhood is a conservation area with views and a heritage to protect, a common sense approach is necessary. The Haringey definition also does not confirm to the definition of "tall" buildings in London Plan 7.25 ("Tall and large buildings are those that are substantially taller than their surroundings").

Historic England's representation also identifies other general concerns with the approach being taken so why not give more thought to the important questions raised?

(http://www.haringey.gov.uk/sites/haringeygovuk/files/27_historic_england_redacted.pdf)

RSA 100 & 101 (SA 38 & 43 - Openness of MOL – Highgate Woods and Queens Wood)

In RSA100, RSA 101 (pp 227- 229) Haringey says that public views of MOL at SA 38 & SA 43 are neither protected by any policies nor worthy of protection. They say:

"Neither the NPPF or Policy 7.17 address development adjacent to Green Belt/MOL nor a requirement therein to preserve its openness. By inference, such consideration is not consistent with the purpose of MOL."

However, this is hardly the case since London Plan Policy 7.17 expressly says:

*"The Mayor strongly supports the current extent of Metropolitan Open Land (MOL)... **and its protection from development having an adverse impact on the openness of MOL.**"* (my emphasis).

The Council's response says:

"It is not considered that the views, as they are at present across the site, are sufficiently valuable to protect, and indeed that redevelopment on this site could be of benefit to the character of the area."

My representation was not against redevelopment - it only asked for guidelines and clear requirements to ensure the openness of the MOL at SA38 & 43 is not adversely impacted/harmed by redevelopment. This seems all the more necessary since the Council's response makes it plain that they don't value the existing open views either at SA38 or SA43.

NPPF 132 plainly states that conservation should be accorded "great weight" and stresses that development within the setting of a heritage asset (such as a Conservation Area) can cause loss or harm to its significance. Despite this, no protection is on offer in the Plan for public views at either SA38 or SA43. Why is no basic revision possible?

RSA102 (SA 44 – Hillcrest Estate Garden Land)

The Council's response (p234&5) is self contradictory, saying that:

"The issue of this site being publically owned is considered mute." (sic)

If so, why is the Council using the land's ownership as the primary rationale for its redevelopment? EG:

"The allocation seeks to make the best use of this publically-owned housing site"

RSA 103 (SA 39 – Gonnerman & Goldsmiths Court)

The Council's response acknowledges (p236) that this site allocation encompasses a public park whose existence was previously ignored in the DPD. Yet the park "Coleridge Gardens " is around four times the area of the "Gonnerman" building, and occupies an area almost equal to "Goldsmith's Court". Why was it omitted from the Local Plan?

Despite its public use and prominence, the Park is being treated by Haringey as a subservient piece of land, ready to be quietly sacrificed to accommodate the taller (or "large"?) building an adjacent freeholder wants.

The Council now cites DM20 as potential "protection" for the Park, rather than agreeing, as requested by the representation, simply to redraw the SA39 Site plan red line in the DPD in order to exclude the park from destruction. Perhaps the Council intends to offer pre-existing railway backland as a "fair exchange" for the future loss of Coleridge Gardens to development? However, that would be a very bad deal because the park is exactly what (and where) a park is needed to be of tangible benefit to the local community living around and near a busy A-road.

Coleridge Gardens must be unequivocally excluded from the SA39 site allocation for the reasons given before and above.

Site Inventories

The site inventories reflect the potential impact of redevelopment in the absence of tighter site-specific guidelines and requirements. They focus attention on the benefits that the current level of Conservation continues to provide to the neighbourhood.

The photo-compositions simulate visually the impact of changes and consider what could be lost without further specific controls. They are illustrative only and no critique of building design is intended: modern architecture can be beautiful. The main issue for Highgate in the plan lies with the negative consequences to existing character from inappropriate building placing and scale.

Potential impact - SA43, Muswell Hill Road

Illustrative depiction
using design approved
elsewhere



What would be lost to the community here –

Existing open MOLviews/ essential local character

Long range views

Visual connection between the two separate tracts of woodland/ unity of place

Sun and daylight (overshadowing)

Sense of an ancient open space

The quietness of the location outside rush hours



Existing site view shown above

Potential impact – SA 39, Coleridge Gardens



What would be lost to the community here -

The Public Park and its wide, fronting pavement open space – a still calm space on a busy road

Sun and daylight on the crossings (overshadowing)

A decent wide, open public space at a busy junction/pedestrian crossing

The sense of pedestrian safety

Visibility of traffic conditions both ways across the Shepherds Hill/Archway corner

The quietness/stillness of the junction outside rush hours (increases in noise/pollution due to “canyoning” impact)



Existing garden view shown above

Potential impact – SA 38, Archway Road



Illustrative depiction using design approved elsewhere

What would be lost to the community here

Existing MOL and open sky views

Visual connection between this area and the green spaces of the woods beyond

Sun and daylight in the public realm

The quietness of the location outside rush hours (increases in noise/pollution due to “canyoning” effects)



Existing view shown above

