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Submitted to  
Highgate Neighbourhood Forum





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# HIGHGATE NEIGHBOURHOOD PLAN: STRATEGIC ENVIRONMENTAL ASSESSMENT

ENVIRONMENTAL REPORT

REGULATION 16 UPDATE

August 2016

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## **INTRODUCTION**

## 1 BACKGROUND

- 1.1.1 AECOM is commissioned to undertake a Strategic Environmental Assessment (SEA) in support of the emerging Highgate Neighbourhood Plan ('the Plan'). The Plan is being prepared by Highgate Neighbourhood Forum, which was established in May 2012 and recognised by Camden and Haringey Borough Councils in December 2012.<sup>1</sup>
- 1.1.2 The Plan, once adopted, will present planning policy and guidance for the neighbourhood area. Alongside the London Plan, the Camden Local Plan and the Haringey Local Plan, it will provide a framework for determining planning applications over the next 15 years.
- 1.1.3 SEA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of environmental (and wider sustainability) issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SEA of the Plan is a legal requirement.<sup>2</sup>

## 2 SEA EXPLAINED

- 2.1.1 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the SEA Directive (2001/42/EC).
- 2.1.2 In-line with the Regulations, a report (known as **the Environmental Report**) must be published for consultation alongside the draft plan that assesses the likely significant effects of implementing 'the plan, and reasonable alternatives'.<sup>3</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 More specifically, the report must answer the following **three primary questions**:
1. What has Plan-making / SA involved **up to this point**?
    - Including with regards to consideration of 'reasonable alternatives'.
  2. What are the SA findings **at this stage**?
    - i.e. in relation to the draft plan.
  3. What happens **next**?
    - What steps will be taken to finalise the plan?
    - What measures are proposed to monitor plan implementation?

<sup>1</sup> The Localism Act (2012) makes provisions for the formation of neighbourhood forums to "further the social, economic and environmental well-being of individuals in a neighbourhood area" and/or to "promote the carrying on of trades, professions or other businesses in an area".

<sup>2</sup> SEA is not an automatic requirement for Neighbourhood Plans. Rather, SEA is a requirement where an initial 'screening' assessment identifies the potential for significant environmental effects.

<sup>3</sup> Regulation 12(2)

2.2 This Environmental Report

- 2.2.1 The National Planning Practice Guidance (paragraph 41) sets out that "The environmental report will not necessarily have to be amended if the neighbourhood plan is modified following responses to consultation." Only where the plan is substantially altered might an update be required. In the case of Highgate, the Plan has not been substantially altered but nonetheless the Environmental Report has been updated to reflect comments received on the second Regulation 14 consultation and changes made to the Plan prior to submission to Haringey Council. Where updates have been made, they are highlighted as ~~strikethrough~~ for deletions and **blue highlights** for additions.
- 2.2.2 This document is the **updated (in response to consultation)** Environmental Report for the Highgate Neighbourhood Plan, and as such each of the three SEA questions is answered in turn below, with a 'part' of the report dedicated to each.
- 2.2.3 Before answering Question 1, however, there is a need to set the scene further by answering two initial questions set out in **Table 2.1** (i.e. 'What's the plan seeking to achieve?' and 'What's the scope of the SEA?').
- 2.2.4 **Table 2.1** explains more about the regulatory basis for answering certain questions ('initial' and 'primary') within the Environmental Report.

Table 2.1: Questions answered by this Environmental Report, in-line with Regulatory<sup>4</sup> requirements

INITIAL QUESTIONS ANSWERED		AS PER REGULATIONS... THE REPORT MUST INCLUDE...
What's the plan seeking to achieve?		<ul style="list-style-type: none"> <li>• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
What's the scope of the SEA?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>• Relevant environmental protection objectives, established at international or national level</li> <li>• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>• The environmental characteristics of areas likely to be significantly affected</li> <li>• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>

<sup>4</sup> Environmental Assessment of Plans and Programmes Regulations 2004

INITIAL QUESTIONS ANSWERED		AS PER REGULATIONS... THE REPORT MUST INCLUDE...
	What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>• Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
PRIMARY QUESTIONS ANSWERED		AS PER REGULATIONS... THE REPORT MUST INCLUDE...
	What has plan-making / SEA involved up to this point? [See <b>Part 1</b> , below]	<ul style="list-style-type: none"> <li>• Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>• The likely significant effects associated with <b>alternatives</b></li> <li>• Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
	What are the SEA findings at this current stage? [See <b>Part 2</b> , below]	<ul style="list-style-type: none"> <li>• The likely significant effects associated with <b>the draft plan</b></li> <li>• The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing <b>the draft plan</b></li> </ul>
	What happens next? [See <b>Part 3</b> , below]	<ul style="list-style-type: none"> <li>• A description of the monitoring measures envisaged</li> </ul>

N.B. The right-hand column of the table does not quote directly from the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report. Also, **Appendix II** presents supplementary information (in the form of a checklist) to further explain how/where regulatory requirements are met within this report.

### 3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

- 3.1.1 Over a fifteen year period the policies within the plan will be applied (alongside those of the London Plan, and the adopted Local Plans of Haringey and Camden Councils) when determining planning applications within the plan area (see Figure 3.1), with a view to achieving a vision for the area, the plan objectives and ultimately 'sustainable development'.
- 3.1.2 The intention is to present policy under the following headings:
- Social and community
  - Economic activity
  - Traffic and transport
  - Open spaces and public realm

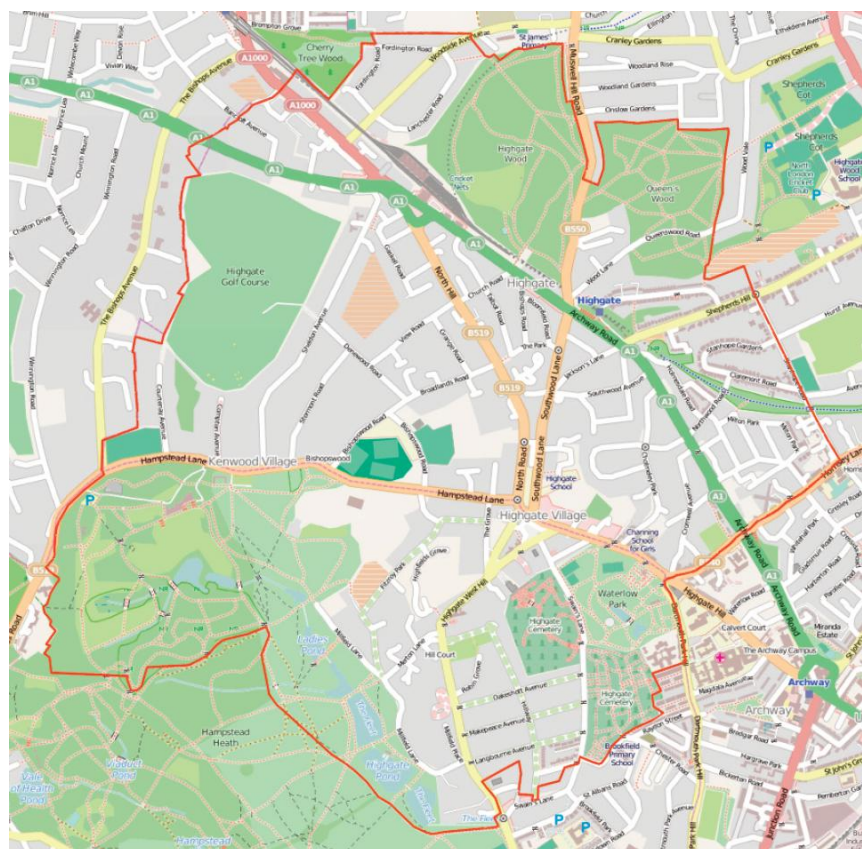


- Development and heritage.

3.1.3 Also, the plan will set policy to guide development at five established 'Key sites' (i.e. sites set for redevelopment over the plan period).

3.1.4 Finally, a Delivery and Monitoring section of the Plan will recommend how Community Infrastructure Levy (CIL) monies should be spent, recognising that once the Plan is adopted 25% of CIL monies raised through development within the Forum Area will be spent locally.

**Figure 3.1: The plan area**



**What's the plan not seeking to achieve?**

3.1.5 It is important to emphasise that the plan will be strategic in nature. Even site specific policy should be strategic, in that detail is omitted to enable flexibility at the planning application stage. The strategic nature of the plan is reflected in the scope of the SEA.

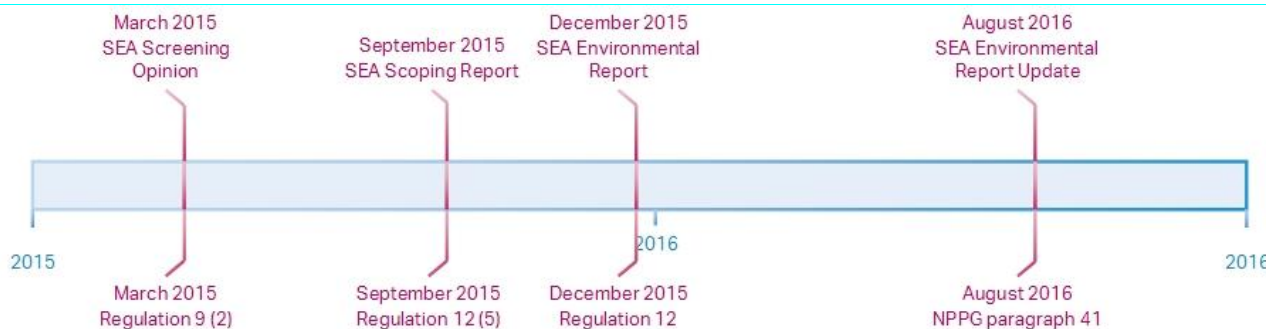
**Screening**

3.1.6 In the course of consultation, concerns were raised with regard to the evidence presented that the Forum had not gone about preparing their plan in line with EU obligations, notably compliance with the SEA Regulations:

*"There is no screening assessment along the lines required by Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004."*

*"We object to HNP's failure to undertake or provide a Sustainability Appraisal and an EIA/SEA screening assessment, which is a fundamental objection that probably requires work on the HNP to recommence from the start."*

3.1.7 AECOM have set out in **Figure 3.2** a clear timeline of the SEA and plan-making process. This, and **Appendix II: 'Regulatory requirements'** clearly establish that an SEA has been undertaken in line with the SEA Regulations.



**Figure 3.2: SEA and plan making timeline**

## 4 WHAT'S THE SCOPE OF THE SEA?

### 4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the issues / objectives that should be a focus of (and provide a broad methodological framework for) SEA. Further information on the SEA scope – i.e. a more detailed review of issues/objectives as highlighted through a review of the 'context' and 'baseline' - is presented in within **Appendix III**.

#### Consultation on the scope

4.1.2 The Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the [Environmental Report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans"*. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>5</sup> As such, a Scoping Report was published for consultation in 2015. All comments received on the SEA scope have been taken into account and are reflected in the current SEA scope.<sup>6</sup>

<sup>5</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

<sup>6</sup> The main substantive response was received from Natural England, highlighting biodiversity issues in relation to one of the redevelopment sites that is set to be assigned policy through the plan (Muswell Hill Road/Summersby Road).

**4.2 Key objectives**

4.2.1 Listed below under a series of broad topic<sup>7</sup> headings are the sustainability objectives established through scoping, i.e. in-light of context/baseline review and consultation. Taken together, this list of objectives provides a methodological ‘framework’ for SEA.

**Table 4.1: SEA Framework**

SEA topic	SEA objectives
<b>Air quality</b>	1. Promote measures to reduce air pollution. 2. Promote sustainable transport use and reduce the need to travel.
<b>Biodiversity</b>	3. Protect, and where possible enhance, all biodiversity and geological features.
<b>Climate change</b>	4. Promote climate change mitigation in Highgate. 5. Support the resilience of Highgate to the potential effects of climate change.
<b>Economy &amp; enterprise</b>	6. Support and maintain a strong and sustainable local economy
<b>Health &amp; well-being</b>	7. Promote the health and well-being amongst local residents.
<b>Historic environment &amp; landscape</b>	8. Protect, maintain and enhance Highgate’s cultural heritage resources, including its historic environment and archaeological assets. 9. Protect and enhance the character and quality of landscapes / townscapes.
<b>Population, housing &amp; community</b>	10. Provide a range of types of housing including affordable housing, and a mix of dwelling sizes, types and tenures. 11. Cater for existing and future residents’ needs as well as the needs of different groups in the community (e.g. younger persons).
<b>Transport</b>	12. Promote sustainable transport use and reduce the need to travel, especially using private cars.

<sup>7</sup> The topics were identified in-light of: 1) The ‘issues’ suggested by the SEA Regulations; 2) the objectives used by Camden and Haringey Councils as part of Sustainability Appraisal (SA) work; and 3) an understanding of the Highgate Neighbourhood Plan objectives (i.e. an understanding of the ‘plan scope’). Rather than focusing strictly on the environment, the topics cover all three ‘pillars’ of sustainable development, i.e. the environmental, social and economic pillars. This is appropriate given that sustainable development is a stated objective for Neighbourhood Development Plans. It is also appropriate in that the SEA Regulations refer to ‘sustainable development’ and imply that ‘the environment’ should be conceived of in a broad sense. Extending the scope of SEA to give equal prominence to issues across the three pillars of sustainable development is the approach taken for Local Plans.

**PART 1**

**WHAT HAS PLAN-MAKING / SEA INVOLVED UP TO THIS POINT?**

## 5 INTRODUCTION TO PART 1

5.1.1 The 'story' of plan-making / SEA up to this point is told within this part of the Environmental Report. In particular, the aim is to explain how preparation of the draft plan has been informed by assessment of **alternatives** in relation to the following two policy areas / issues:

1. **Economic activity**, and specifically the matter of allowing/preventing premises changing use class (e.g. A1 use class is retail; B1 use class is office space; C1 use class is residential) within Highgate Village Core, along Archway Road and at Aylmer Parade.
2. **Open space and public realm**, and specifically the policy approach to managing the existing open space at the Hillcrest Estate.

5.1.2 Note that subsequent to consultation on the draft Plan, no further alternatives were identified for these issues, nor were any further issues identified for which reasonable alternatives should be developed.

### Reasons for focusing on these particular policy issues

5.1.3 The SEA Regulations establish a need to take account the plan objectives/aim when determining what 'reasonably' must be the focus of alternatives assessment. The aim of the Highgate Neighbourhood Plan is to: A) Establish area-wide policy to address issues relating to 'social and community', economic activity, traffic and transport, open spaces / public realm and development and heritage; and B) Establish site specific policy at five key sites.

5.1.4 As such, initial consideration was given to the possibility of developing/assessing ten sets of alternatives (i.e. five relating to thematic policy areas/issues, and five relating to specific sites). However, after an initial review it was determined that a more proportionate approach would involve assessing two sets of alternatives, i.e. alternatives in relation to (1) and (2) above.

5.1.5 Policy issues (1) and (2) are very different in nature, in that (1) is an almost area-wide issue whilst (2) is site specific. Regardless, these are the two policy issues that it was determined should be the focus of alternatives assessment. In relation to both (1) and (2), depending on the approach taken, there is the potential for impacts to the sustainability baseline (positive and/or negative) and there is known to be considerable interest in these policy issues (hence there is merit to presenting information on alternatives). These are both policy areas that were a focus of the joint Camden/Haringey response to the January 2015 consultation on a draft Highgate Neighbourhood Plan.

5.1.6 For other issues (area-wide and site specific) set to be assigned policy, it was determined that there need not be formal assessment of alternatives. Rather, it was felt appropriate and proportionate for a preferred (draft plan) approach to be determined without formal SEA input (i.e. developed on the basis of technical evidence and evidence gathered through consultation), and then for the preferred approach to be assessed against the baseline (aka the 'do nothing option') as part of the assessment of the draft plan (see Part 2 of this Report). The policy approach to addressing other issues is relatively non-contentious at this stage in the plan process, with the emerging preferred approach having already been adjusted and refined to reflect the views of the two Councils and stakeholder organisations.

- 5.1.7 With regards to site specific policy, there is very little variation between what is being proposed through the emerging Neighbourhood Plan and what is being proposed through the Haringey's emerging Site Allocations Plan, hence it was deemed unnecessary to appraise alternatives for any site. It is also important to note that there are no other sites that are in contention for allocation/policy, but which are not set to be allocated (i.e. it cannot be said that plan-making has involved site selection). Other sites have been considered by the Forum, but were either ruled out on the basis of being too small to necessitate allocation, or were given planning permission ahead of the plan (notably the Magistrates Court site, the Richardsons site and the Winchester Pub site).

### Structure of this part of the Environmental Report

- 5.1.8 A chapter is assigned to (1) and (2), with each chapter answering the following questions:
- What are the reasonable alternatives?
  - What are alternatives assessment findings?
  - Why is the preferred approach supported (in light of alternatives assessment)?
- 5.1.9 These questions reflect the regulatory requirement to present an assessment of 'reasonable alternatives' as well as 'outline reasons for selecting the alternatives dealt with' within the Environmental Report.

## 6 ECONOMIC ACTIVITY

### 6.1 Introduction

6.1.1 As discussed above, a decision was taken to assess alternatives in relation to 'economic activity', and specifically the matter of allowing/preventing premises changing use class (e.g. A1 use class is retail; B1 use class is office space; C1 use class is residential) within Highgate Village Core, along Archway Road and at Aylmer Parade.

6.1.2 The aim of this chapter is to: 1) Explain reasons for having selected the alternatives dealt with; 2) Present alternatives assessment findings; and 3) Present the Forum's reasons for supporting the emerging preferred approach (in light of alternatives assessment).

### 6.2 What are the reasonable alternatives?

6.2.1 Through their joint response to the January 2015 consultation, Camden and Haringey Councils identified that the emerging preferred approach is not consistent with emerging borough wide policies on local centres (e.g. minimum thresholds for A1 uses), but did not object to the draft policy on the basis that: "... there is scope for a more locally specific policy on managing town centre uses in the Highgate area." The Councils went on to state that: "The policy will need to be supported by more detailed local evidence... [and the] Forum is encouraged by Haringey to establish a clear vision and objectives for the centre[s], which would help frame the planning policy..."

6.2.2 This statement by the Councils serves to highlight the importance of policy in respect of the centres, and therefore the merit in appraising alternatives. As for the alternatives that should 'reasonably' be appraised, it is clearly the case that there is merit in appraising the emerging preferred approach versus an approach that would involve relying instead on emerging borough-wide policy. The alternatives are suitably different, and testing these alternatives helpfully enables consideration of wide-ranging sustainability issues. It is recognised that 'relying on borough-wide policy' is arguably the baseline (or 'do nothing' option); however, it is nonetheless helpful to give explicit consideration to these alternatives.

6.2.3 In light of this discussion, the following alternatives were assessed:

**Option 1)** Establish policy specific to each of the three centres within Highgate

**Option 2)** Rely on Camden/Haringey Local Plan policy.

### 6.3 What are alternatives assessment findings?

6.3.1 The table below presents summary assessment findings. Detailed assessment findings can be found within **Appendix IV**. The methodology is explained in the appendix, but in summary: Within each row (i.e. for each SEA topic) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference.



*Summary assessment findings: Economic activity*

- (1) Establish policy specific to each of the three centres within Highgate**
- (2) Rely on Camden/Haringey Local Plan policy.**

Topic	Effect categorisation / Rank of preference	
	Option 1	Option 2
Air quality	★ 1	<b>2</b>
Climate change	★ 1	<b>2</b>
Economy and enterprise	★ 1	<b>2</b>
Health and wellbeing	★ 1	<b>2</b>
Historic environm't and landscape	★ 1	<b>2</b>
Population, housing & community	=	
Transport	★ 1	<b>2</b>

Summary

The policies seek to supplement emerging Haringey and Camden policy to a small but notable extent, such that there is additional policy support for maintaining a mix of town centre uses, i.e. supporting retail and employment and restricting residential. For Highgate Village Centre, the policy will also have the effect of tying together Camden and Haringey Policy, ensuring that planning decisions take into account the mix of uses within the centre as a whole (as opposed to the mix of uses within the Camden part or the Haringey part). There are wide ranging community and local economy benefits associated with policy that will maintain the function and vibrancy of centres in the long term, perhaps most notably from a 'health and wellbeing' perspective in that those who are less mobile rely on local centres in order to meet their needs. It is also the case that the centres - and most notably Highgate Village Centre - are heritage assets and their heritage significance is tied to their function. However, there is a tension in that from, a 'housing' perspective, it can be argued that a more permissive approach - i.e. one that allows for change of to residential, where it is demonstrated that retail/employment is non-viable - is appropriate.

N.B. Significant effects are not predicted, hence there is no **red** or **green** shading within the table above.

## 6.4 Why is the preferred approach supported (in light of alternatives assessment)?

### 6.4.1 The following text was prepared by the Neighbourhood Forum, in response to the alternatives assessment:

There are three shopping areas in the Neighbourhood, each with its own challenges.

Highgate High Street has suffered, in the past, from a non-collaborative approach between Camden and Haringey. Change of use planning applications have been decided without reference to the other side of the street (one side is in each Borough), the street furniture does not match and you can buy a parking permit for one side of the street which will get you a parking ticket on the other! Somehow many of the independent retailers have kept afloat, though some units change hands more frequently than others. However, there is a consensus that there are enough estate agents and coffee shops and that a line should be drawn. The purpose of the baseline assessment is to establish a mix which is viable and which works.

Until recently, Archway Road had been in decline for many years. Several shops were boarded up and had been un-let for years. Others were illicitly converted, behind shutters, into 'residential' units, though frequently no actual conversion had taken place, no planning permission sought or granted, and there had been no building control inspection. These very poor residential units and closed shops contributed to a very run-down feel.

In 2014 a mini Sainsburys opened in two vacant units, and over the last two years almost all other units have been let or converted back into retail. This most successful stretch of Archway Road is passed by hundreds of commuters each day on their way to and from Highgate Underground, and for the first time in 25 years it feels like a vibrant shopping street. Again, the baseline assessment is to record the current mix. The change since this was done a year ago is striking. The Forum believes that this is proof that Archway Road is a viable shopping street and provides much needed local shops which take cars off the road. It is hoped that if illicit conversions were to occur again Forum policies would give Haringey powers to enforce against them.

The mix at Aylmer Road is important as it provides both local shops and employment in small and medium enterprises (SMEs) in an area which is otherwise deficient in these things. There is a potential for redevelopment on the site and the Forum wishes to see the employment use protected in line with the London Plan.

## 7 OPEN SPACE AND PUBLIC REALM

### 7.1 Introduction

7.1.1 As discussed above, a decision was taken to assess alternatives in relation to 'open space and public realm', and specifically the policy approach to managing the existing open space at the Hillcrest Estate.

7.1.2 The aim of this chapter is to: 1) Explain reasons for having selected the alternatives dealt with; 2) Present alternatives assessment findings; and 3) Present the Forum's reasons for supporting the emerging preferred approach (in light of alternatives assessment).

### 7.2 What are the reasonable alternatives?

7.2.1 Through their joint response to the January 2015 consultation, Camden and Haringey Councils identified that the emerging approach of seeking to protect open land at Hillcrest Housing estate is not in conformity with Haringey's draft Site Allocation SA447. As such, there is clearly merit in appraising two alternative approaches - i.e. the emerging Highgate Neighbourhood Plan approach and the emerging Haringey Site Allocation Plan approach. It is recognised that 'relying on borough-wide policy' is arguably the baseline (or 'do nothing' option); however, it is nonetheless helpful to give explicit consideration to these alternatives.

7.2.2 In light of this discussion, the following alternatives were assessed:

**Option 1)** Designate open land at Hillcrest Housing Estate as 'Local Green Space'

**Option 2)** Do not designate.

### 7.3 What are alternatives assessment findings?

7.3.1 The table below presents summary assessment findings. Detailed assessment findings can be found within **Appendix IV**. The methodology is explained in the appendix, but in summary: Within each row (i.e. for each SEA topic) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference.

*Summary assessment findings: Open space and public realm*

**(1) Designate open land at Hillcrest Housing Estate as 'Local Green Space'**  
**(2) Do not designate.**

Topic	Effect categorisation / Rank of preference	
	Option 1	Option 2
Biodiversity	★ 1	2
Health and wellbeing	★ 1	2
Historic environment and landscape	★ 1	2
Population, housing and community	=	

Summary

Protecting the existing open and green space in the long term could lead to wide ranging benefits. Most significant are benefits to existing residents of the estate (which comprises social housing), but there are also notable benefits from a heritage and biodiversity perspective. As such, a policy to designate Local Green Space (Option 1) is the preferred option when considered in terms of the majority of sustainability objectives. However, there is a draw-back to Option 1 in that it might act to preclude future intensification of the site, i.e. development of some land within the site for housing. Hillcrest is designated in the emerging Haringey' Site Allocations DPD as a site for new housing, to include 'affordable housing', with the designation covering the entire estate and not specifying areas within the estate for development. It may be that the Local Green Space designation could be implemented without conflicting with the Site Allocation (recognising that Haringey Development Management Policy aims to protect open/green space); however, this is unclear.

## 7.4 Why is the preferred approach supported (in light of alternatives assessment)?

### 7.4.1 The following text was prepared by the Neighbourhood Forum, in response to the alternatives assessment:

The Forum does not support any intensification on Hillcrest as it does not recognise any potential sites for development on the estate. Of the sites proposed by Homes for Haringey, two are SINCs, one provides parking for the estate and is already over subscribed, and the fourth is a local amenity/children's play area.

None of the residents at Hillcrest has private amenity space, so to take away the communal space is simply not acceptable. Hillcrest is not within 400m of any other amenity space.

Any new build on the car park would have to provide enough spaces to compensate the loss, plus extra to accommodate new dwellings. This would almost certainly require a double storey basement under any new building – an incredibly costly option.

Furthermore, it is not clear that any housing built would be affordable. The Forum recognizes the need for more affordable housing in Highgate, but until there is clarity on the government's Housing Bill it is uncertain how this will be achieved at Hillcrest. It would be ironic if the open space and amenity on a very well conceived social housing estate was compromised by private development. The Forum hopes that other new housing sites as listed in the key site areas will provide more affordable homes in Highgate.

On balance, the Forum is firmly of the opinion that the benefits of keeping the open space at Hillcrest outweigh the potential for housing.

The open spaces at Hillcrest are listed in the Highgate Neighbourhood Forum policy OS3. The Forum intends to extend protection for the spaces at Hillcrest (and others in the Forum area) by submitting them for designation as Local Green Spaces, with the support of the community, following our Neighbourhood Plan consultation.

## **PART 2**

### **WHAT ARE THE SEA FINDINGS AT THIS STAGE?**

## 8 INTRODUCTION TO PART 2

8.1.1 The aim of this part of the report is to present an assessment of the Draft ('pre-submission') Plan, and also to present 'conclusions at this current stage'.

## 9 ASSESSEMENT OF THE DRAFT PLAN

### 9.1 Methodology

9.1.1 The assessment is structured using the eight SEA topics established through scoping, i.e -

- Air quality
- Biodiversity
- Climate change
- Economy and enterprise
- Health and wellbeing
- Historic environment and landscape
- Population, housing and community
- Transport

9.1.2 For each topic a range of sustainability objectives (as identified through scoping) are listed. Taken together, the topics and objectives provide a methodological 'framework' for the assessment of likely significant effects on the baseline.

9.1.3 The assessment takes account of the criteria presented within Schedule 2 of the Regulations.<sup>8</sup> So, for example, account is taken of the potential for effect significance to be a factor of the timescale and reversibility of effects. Cumulative effects are also considered, i.e. the potential for the plan to impact the baseline in combination with other plans, or unplanned activity.

9.1.4 Every effort is made to identify and evaluate effects accurately; however, this is inherently challenging given uncertainty regarding the 'on the ground' implications of policy. The ability to predict effects accurately is also limited by understanding of the baseline. In many instances it is not possible to predict effects with any certainty (on the basis of reasonable assumptions), but it is possible to comment on the draft plan in more general terms.

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<sup>8</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 9.2 Air quality

### Discussion of relevant policies

9.2.1 Air quality is an issue across the whole plan area, and concentrations of air pollution will exist along busy roads, including the area's major arteries (The A1, Archway Road; and the B519 Highgate Hill through). These roads are similarly associated with noise pollution and safety issues.

9.2.2 Policy **DH910** (The environmental health of **existing and** future residents) specifies the transport corridors along which certain types of development will require air quality and noise assessments, with the aim of ensuring new residential development and other sensitive uses, are located and designed with air pollution (and wider environmental health) issues in mind.

9.2.3 Policy **EA2** (Archway Road) possibly leads to a slight tension with air quality objectives, in that it supports change of use to A1 or A3 uses, and as such will encourage pedestrians, and potentially restaurants/cafes with outside seating, along this busy road (with known air quality and pedestrian safety issues). However, this is not likely to be a major issue, including on the basis that cafes here are more likely to have outside seating at the rear than at the front.

9.2.4 A number of other policies are aimed at reducing traffic congestion, either through encouraging 'modal shift' away from car use and towards walking/cycling and use of public transport, or through supporting good flow of traffic. Notably -

- Policy **TR14** (Promoting Sustainable Movement) requires all new development to **promote sustainable travel** ~~contribute where appropriate to enhancing the connectivity of the Plan area through the provision of new and improved~~ **footways and cycleways** cycle links, bike parking facilities, footpaths **and** public transport stops ~~and new through routes~~. The policy seeks to respond to specific identified opportunities that are not covered by Camden/Haringey policy (given the relatively peripheral nature of Highgate).
- Policy **TR21** (Movement of Heavy Goods) seeks to ensure that development does not lead to on-site and off-site impacts, both during and after the period of development. The policy seeks to respond to a specific identified problem, stemming from Highgate's varied network of roads and 'tapestry' of buildings with diverse uses (e.g. with workshops and offices often next door to homes). Similarly, Policy **TR32** (Minimising the Impact of Traffic Arising from New Development) seeks to respond to problems that have been known to arise locally, as a result of development or change of use (e.g. expansion of educational and medical facilities contributing to the increase in traffic and congestion).
- Policy **TR43** (**Reducing the Negative Impact of Parking in Highgate** ~~Improving Parking in Highgate~~) seeks to address another identified issue locally, with implications for traffic congestion (and therefore air quality) and health/safety

NO<sub>2</sub> pollution (red/yellow) along transport corridors, with the two main corridors evident





more widely. Specifically, the policy seeks to ensure that new development provides for essential usage only, recognising that in some streets - typically densely packed Victorian terraced housing - the demand for residents' spaces alone outstrips kerb space. The policy reaffirms Camden/Haringey policy by specifying that, other than in exceptional circumstances, car-free development will be expected in Controlled Parking Zones (CPZs) and areas with good transport connections. Similarly, Policy **TR5** (Dropped kerbs and Cross-overs) seeks to limit the ability for private households to create off-street parking where it is to the detriment of general on-street provision.

9.2.5 Generally speaking, the direction of the plan to protect / add A1 uses may have a positive indirect effect, in-combination with TR policies, of providing greater opportunities to access the town centre via walking or cycling.

9.2.6 Finally, it is noted that site specific policies are set to be put in place to ensure that site layout and design measures reduce exposure to air pollution. Three of the five Key Sites - KS1, KS2 and KS5 - lie along Archway Road, highlighting the importance of ensuring appropriate measures are taken. Notably, **KS1** (460-470 Archway Road) is set to require: "The arrangement of the site ensures that the residential element is located and screened in such a way that it protects future residents from excessive levels of noise pollution from both surrounding uses and future uses on site.

#### Conclusions on the draft plan

9.2.7 The plan seeks to build on established Camden/Haringey policy, and respond to Highgate-specific issues and opportunities. The effect should be to ensure that planning decisions do not result in increased exposure to air pollution - i.e. a situation whereby sensitive uses are directed to areas of poor air quality, or traffic congestion worsens to the detriment of air quality - and that unavoidable negative effects (i.e. effects resulting from delivery of new housing along Archway Road) are fully mitigated. On the whole, the plan will lead to **positive effects**, although there is a slight tension in that the plan is set to support A1 (shops) and A3 (restaurants and cafes) uses along Archway Road.

### 9.3 Biodiversity

#### Discussion of relevant policies

9.3.1 There are considerable issues and opportunities locally, given that 44% of the plan area is green space, and a further 27% of it is garden land. However, the role of the planning system is limited (e.g. there is no potential to influence the management of open space).

- 9.3.2 An objective of the plan is 'To empower the whole community to protect, enhance and obtain the maximum benefits from Highgate's open space, where this does not harm the existing integrity or character of the open space, whether publicly-accessible or not'. empower the whole community to protect, enhance and obtain the maximum benefits from Highgate's open space' and Sub-objectives reference the need to link Highgate's public spaces to educational, cultural, ecological and recreational uses; protect and enhance the area's village character through conservation of its natural features, including trees, habitats and open spaces; and safeguard and enhance the biodiversity of the area's major Open Spaces by ensuring that development in the Plan Area does not adversely impact on those spaces, or on the ecologically important network of smaller green spaces. **CO4** also aims to "improve those areas of **SSSI**, **SINC** and **MOL**<sup>9</sup> which are currently in unfavourable or declining condition through complementary decision-making relating to the use of adjacent sites."
- 9.3.3 Policy **OS4** (Biodiversity and Ecological Corridors) seeks to build on Camden/Haringey policy by ensuring that consideration is given not just to impacts on important sites, but also to land that performs a supporting role as part of the local 'ecological network', with supporting text clarifying that 'ecological corridors' and 'stepping stones' between key sites (most notably Hampstead Heath **Woods SSSI** and Highgate Wood) are known to provide an important function locally. Land afforded a degree of protection through the policy will include the covered reservoirs, areas of road and railway embankment and public and private gardens.
- ~~9.3.4 Policy **OS1** (Fringes of Highgate's Open Space) recognises that these are sensitive areas, i.e. areas where planning decisions can have wide ranging and significant sustainability implications. In line with the policy, new development on the fringes of open spaces should ensure that it does not harm "the local network of ecological corridors and stepping stones" and that: "Trees, whether or not protected by tree preservation orders, will not be removed or harmed unless demonstrably necessary or otherwise in the public interest."~~
- 9.3.5 The other two OS policies - **OS3** (Local Green Space) and **OS2** (Protection of Trees and Mature Vegetation) - will lead to biodiversity benefits, albeit for **OS3** it is recognised that there is not an explicit focus on biodiversity (with policies instead geared towards supporting townscape, heritage and health/wellbeing objectives). Similarly, Policy **DH101** (**Garden land and Backland Development** ~~Backland Development~~) states that development in back gardens will not normally be permitted, and any schemes should retain existing mature trees and landscaping wherever possible; and Policy **DH78** (Basements) states that: "Any **basement development should normally be expected to allow for a minimum of one metre of permeable soil above any part of the basement beneath a garden to support biodiversity and larger trees/planting. This depth should be greater if necessary to preserve landscaping consistent with neighbouring properties.**~~Any basement development must allow for a minimum of one metre of permeable soil above any part of the basement beneath a garden to support biodiversity and larger trees/planting.~~" This is an important issue in parts of Highgate, where houses were historically built in large plots, with gardens incorporating trees from the landscaped parkland that preceded the housing.

<sup>9</sup> Site of Special Scientific Interest (SSSI), Site of Importance for Nature Conservation (SINC) and Metropolitan Open Land (MOL).

- 9.3.6 Finally, it is noted that each of the Key Site Policies references site specific biodiversity constraints and/or opportunities that should be taken into account when developing and judging proposals. Natural England - the Government's advisor on biodiversity matters - has highlighted the importance of **KS4** (40 Muswell Hill Road) given adjacent Queens Wood Site of Importance for Nature Conservation (SINC). The policy requires "careful consideration [of] any removal of trees" and encourages specific green infrastructure measures; however, it stops short of requiring a 'buffer', and it might also be the case that the requirement to ensure 'no net loss of employment' leads to a tension with biodiversity objectives.

#### Conclusions on the draft plan

- 9.3.7 The plan seeks to build on established Camden/Haringey policy, and respond to Highgate-specific issues and opportunities. The effect should be to ensure that planning decisions do not impact on important habitats and species locally. Minimal conflicts/tensions have been identified (e.g. it is not the case that 'Economic activity' policies have the potential to negatively impact biodiversity, given the focus on existing centres), with only one instance highlighted of a policy (KS4: 40 Muswell Hill Road) that might 'go further' in order to protect biodiversity. Biodiversity issues locally are of 'larger than local' (and potentially London-wide) importance, and it may be possible to assume that the baseline trend is for gradual erosion of the biodiversity baseline, including as a result of planning decisions. The plan will therefore have **positive effects**; however, it is not clear that 'significant' effects will result, given the other factors that come into play.

## 9.4 Climate change

### Discussion of relevant policies

- 9.4.1 The likely positive implications of the plan in terms of encouraging 'modal shift' away from car use and towards walking/cycling and use of public transport are discussed under 'Air quality' (above) and 'Transport' (below). These positive implications will translate into reduced per capita carbon emissions, and therefore a positive climate change mitigation effect. Reduced greenhouse gas emissions from transport will be the primary means by which the Neighbourhood Plan can support climate change mitigation.
- 9.4.2 With regards to reduced emissions from the built environment, opportunities for supporting renewable and low carbon energy technologies and decentralised energy and heating are limited, given that Highgate is an area where development will be relatively restricted. The plan might potentially support energy efficiency / low carbon design approaches (e.g. passive solar design), but in the absence of local evidence of opportunity Camden/Haringey policy may be the best forum for considering such matters. Policies **DH1** (Demolition in Highgate's Conservation Areas), **DH2** (Development Proposals in Highgate's Conservation Areas) and **DH5** (Roofs and Roofscape) could potentially lead to a tension, as low carbon design is not referenced; however, there is little to suggest that delivery of well-located and designed measures will be hindered.

- 9.4.3 With regards to climate change adaptation, a key issue relates to flood risk. In this respect, the plan seeks to build on Camden/Haringey policy through Policy **DH78** (Basements), which establishes 'Enhanced Impact Assessment requirements' ~~Enhanced Basement Impact Assessment (BIA) requirements~~, and specifies that ~~BIA~~ applications should give consideration to drainage and flooding. This is an important issue, as basements can damage the local water regime both in terms of ground water diversion and surface water flooding, and the possibility of impacts to Highgate and Hampstead ponds has been identified (given understanding of the local geology). Also, with regards to flood risk, Policy **TR5** (Dropped kerbs and Cross-overs) establishes that off-street parking accessible by dropped kerbs will only be supported where it can be demonstrated that an appropriate scheme of on-site drainage can be provided to mitigate against off-site flooding caused by run-off from any newly created areas of parking; and reference to site specific flood risk is made within Key Site Policies **KS2** and **KS5**.

#### Conclusions on the draft plan

- 9.4.4 In terms of climate change mitigation, there will clearly be secondary benefits resulting from the policy focus on reducing car travel / traffic congestion, and therefore **positive effects**; however, effects will not be significant. It is also noted that there is a tension between the plan's focus on planning in-line with townscape and heritage constraints, and a desire to minimise carbon emissions from the built environment (e.g. through low carbon design measures); however, there is little to suggest that policy will result in well located and designed measures being precluded or overly restricted.
- 9.4.5 In terms of climate change adaptation, there is a considerable focus on ensuring that basement developments do not lead to long term sustainability problems, as a result of unforeseen impacts to the water regime (recognising that the regime will be altered in the future as a result of climate change). There is much uncertainty, but it could be that the baseline situation is one whereby 'unchecked' basement development directly leads to surface water flooding and/or impacts to water levels at Highgate and Hampstead ponds. On this basis, **significant positive effects** are predicted.

## 9.5 Economy and enterprise

### Discussion of relevant policies

- 9.5.1 A plan objective is to 'maintain the vitality and viability of the area's commercial cores so they continue to meet the day-to-day needs of the community and enrich and enliven the public realm', with sub-objectives referring to 'a new vision for the High Street, Aylmer Parade and the business premises in the Archway Road that is forward-looking, entrepreneurial, sustainable and attractive' and the need to 'attract, maintain and enhance employment'.
- 9.5.2 Maintaining employment uses is perhaps the key issue, from an 'economy and employment' perspective. As stated within the supporting text to the plan:

*"The London Plan anticipates a significant level of employment growth in the Plan area during the period until 2026 (a 29.6% increase 'Full Time Equivalent' jobs) requiring a high level of additional employment land. In which case, the retention of existing units, such as those around Aylmer Parade, Archway Road and Highgate Village, will prove vital in ensuring that a sufficient supply of workshops and small business units remain available to meet this rising need over the Plan period."*

- 9.5.3 The three area-specific policies - **EA1** (Highgate Village Core), EA2 (Archway Road) and EA3 (Aylmer Parade) - all seek to specify a mix of uses that should be maintained over time, and in this way should help to ensure that the centres continue to function as 'hubs' for local business. Policy **EA3** (Aylmer Parade) includes a particular focus on maintaining employment uses, as there is a concentration of small workshops and business units that support small/medium enterprises (SMEs), and provision of new units is also encouraged. There is also a reference to employment uses within **EA1**; however, **EA2** does not reference employment uses. This is perhaps surprising, given that there are employment uses along Archway Road; however, it is understood that the main centre is at the Richardson Site, where planning permission was recently granted for a redevelopment that will maintain the site's employment function.
- 9.5.4 One other matter relates to the policy focus restricting movement of heavy goods, through Policy **TR2** (Movement of Heavy Goods)<sup>1</sup>. There is possibly a slight tension with 'economy and enterprise' objectives; however, this is not likely to be severe.

#### Conclusions on the draft plan

- 9.5.5 The plan will ensure that the three centres - Highgate Village Core, Archway Road and Aylmer Parade - continue to function over time in the way that they do currently, and hence will likely have **positive effects** on the baseline (i.e. a scenario whereby there is pressure for change of use away from retail and employment uses to residential). To a large extent, positive effects will result from the protection of employment uses (offices and workshops, including those suited to SMEs) although the question has been raised whether the plan might go slightly further in this respect (given ambitious London Plan employment growth targets). It is also noted that measures outside the influence of the plan will have a considerable bearing on the mix of uses within the centres, notably Article 4 Directions prepared in conjunction with the Camden and Haringey Councils<sup>10</sup>. On this basis, significant effects are not predicted.

## 9.6 Health and wellbeing

### Discussion of relevant policies

- 9.6.1 A plan objective is to 'enhance accessibility to local services and support the community's health, social and cultural wellbeing', with sub-objectives highlighting that the intention is to achieve this through primarily through addressing traffic congestion and supporting 'sustainable modes of transport'. These matters are considered in more detail below, under the 'Population' and 'Transport' headings, with discussion referencing the following policies (amongst others) as having positive implications: **TR32** (Minimising the Impact of Traffic Arising from New Development); **TR14** (Promoting Sustainable Movement).

<sup>10</sup> Article 4 Directions remove permitted development rights in a specific geographical area, such that planning permission is required for all new development and any renovations to existing buildings.

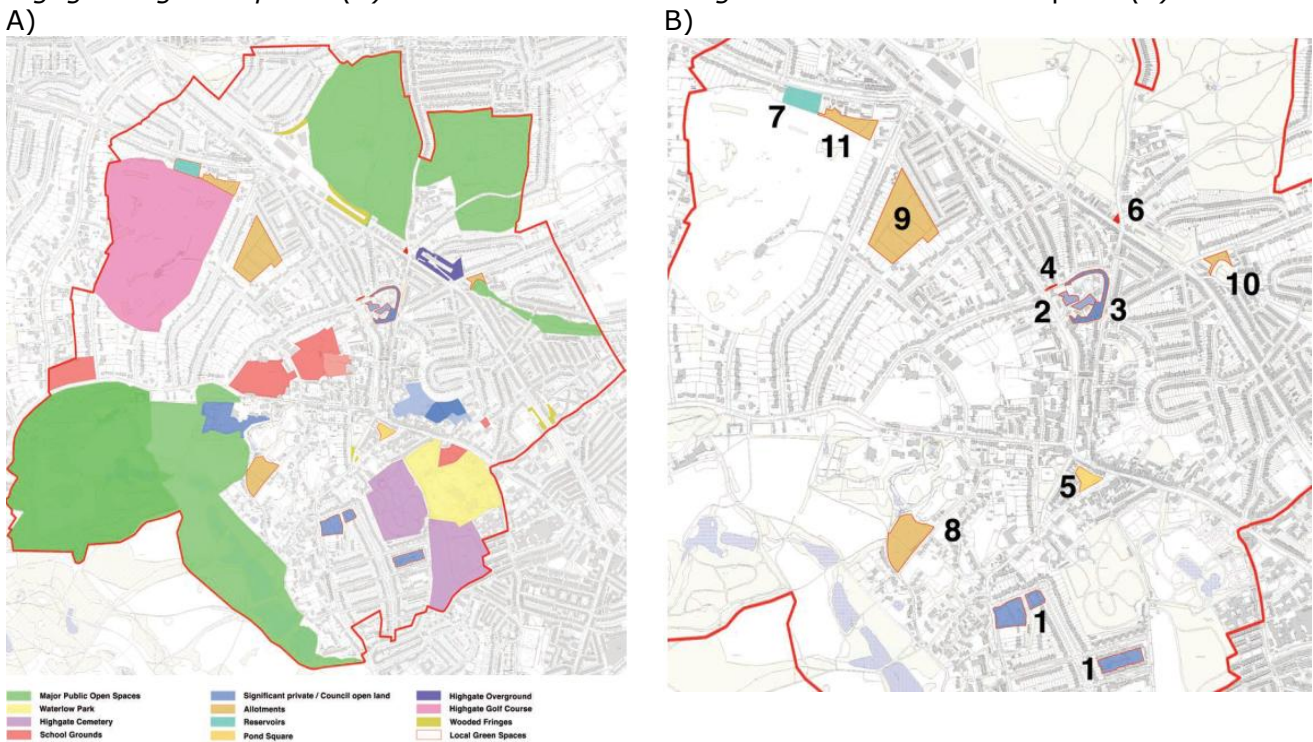
9.6.2 Another plan objective is to 'To empower the whole community to protect, enhance and obtain the maximum benefits from Highgate's open space, where this does not harm the existing integrity or character of the open space, whether publicly-accessible or not. empower the whole community to protect, enhance and obtain the maximum benefits from Highgate's open space', Sub-objectives refer to the need to link Highgate's public spaces to educational, cultural and recreational uses and maximise public access. In-line with this objective, Policy **OS3** (Local Green Space) designates 12<sup>1</sup> areas as local greenspace, recognising that Highgate has a relative deficiency of small local parks and open spaces, and this problem is compounded by Highgate's steep hills (which make its major open spaces difficult to access for those with limited mobility).

9.6.3 Finally, it is important to note that **various other policies** - indeed policies under all five of the thematic headings covered by the plan - will lead to secondary benefits in terms of health and wellbeing. Policies aimed at addressing air quality and other aspects of environmental health are perhaps most notable, but it is also important to consider policies aimed at supporting access to housing, amenity / public realm and functioning local centres.

Conclusions on the draft plan

9.6.4 Numerous aspects of the plan are geared towards preventing a situation whereby high land values result in 'over development' and therefore, in the long term, a situation whereby some local residents (e.g. the young and elderly) are faced with barriers to good health and wellbeing. Perhaps most notable is the policy intention to designate 11<sup>2</sup> areas of local greenspace, some of which might otherwise be at risk of development for housing. It is recognised that 'determinants' of health and wellbeing are numerous; however, on the basis that the baseline situation is one whereby barriers to health and wellbeing worsen through loss of open space, **significant positive effects** are predicted.

Highgate's green spaces (A) and those set to be designated as 'Local Green Space' (B)



## 9.7 Historic environment and landscape

### Discussion of relevant policies

- 9.7.1 The plan vision reflects an intention to maintain the situation whereby “Highgate is a distinctive London village with a rich cultural and architectural heritage spanning hundreds of years. It is almost entirely surrounded by green open spaces which clearly define the neighbourhood and give Highgate its unique village feel” and matters are also prominent in the plan objectives, which reference matters including ‘design and form of both new development and of alterations to existing buildings and boundaries’.
- 9.7.2 The overall number of listed buildings in the Plan area is considerable, and most of the area is also covered by three conservation areas which lend further protection to non-listed buildings and the general character of the area. Local character is a constraint to growth, and is the primary reason why the plan area is set to be assigned relatively little growth through the emerging Haringey and Camden Local Plans. The emerging Neighbourhood Plan equally recognises that local character is a constraint to growth.
- 9.7.3 Even with the area set to receive low growth, the character of the area remains under threat from ‘creeping development’. This includes low-quality and often unsuitable basement conversions (which can have notable above ground impacts, during the construction phase and also as a result of loss of mature trees) and the redevelopment and extension of existing properties incorporating insensitive forms of design – usually on a significantly larger scale (while providing no extra housing units), with high security gates which damage the character of Highgate as a living community.
- 9.7.4 The majority of the 12 Development and Heritage (**DH**) policies will lead to notable benefits, in that they will ensure particular local issues are given due consideration when development proposals are being prepared and when planning decisions are being taken. For example, Policy **DH6** (Front boundaries) seeks to respond to a particular issue arising locally, namely the increasing prevalence of new boundary walls (which will sometimes require planning permission), and gated developments.
- 9.7.5 Numerous **other policies** are geared towards supporting historic environment and landscape/townscape objectives. For example, Policy **TR43** (**Reducing the Negative Impact of Parking in Highgate** ~~Improving Parking in Highgate~~) seeks to ensure that the provision of any new off-street parking is well integrated with the character of its locality; and Policy **OS2** (Protection of Trees and Mature Vegetation) seeks to protect ‘veteran’ trees as heritage assets, recognising that loss of trees can result from proposals for extensions and basement developments.

### Conclusions on the draft plan

- 9.7.6 Policies seek to respond to numerous locally specific issues that have arisen and will continue to arise as a result of ‘creeping’ development activity. Policies are detailed, and the effect should ensure that the distinctive ‘village’ (or, alternatively, ‘leafy inner suburb’) character of Highgate is maintained in the long-term. **Significant positive effects** are predicted.

## 9.8 Population, housing and community

### Discussion of relevant policies

- 9.8.1 A plan objective is to 'help Highgate develop and maintain a strong and sustainable community, which works to minimise social deprivation and exclusion', with sub-objectives referencing the importance of a mix of housing and 'access for all to well-maintained community facilities'. A number of plan policies are set to be put in place to achieve this objective. Furthermore it is the case that other plan objectives, and policies 'hung' from them, will lead to benefits in terms of 'population, housing and community'. This is a highly 'cross-cutting' matter, with plan effects discussed under numerous topic headings within this assessment.
- 9.8.2 Under this current heading, it is appropriate to focus on the matter of 'housing'. There is a high level of social diversity amongst those who live in the neighbourhood, with residential properties ranging from large mansions in the west to houses in multiple occupancy (HMOs) in the east, mainly around the Archway Road. House prices have risen dramatically over the past 10 years, and whilst the plan area is affluent on average, it is also home to a notable number of households who are reliant on affordable or council-owned accommodation (over 650 as of mid-2013).
- 9.8.3 Plan policies set out to encourage developments which enable (through affordable housing, for instance) a broad social mix, and resist those who would wish to capitalise on high land values by maximising market housing (and large market housing). Policy **SC1** (Highgate's Housing Needs) aims to supplement the existing and future housing strategies of both Haringey and Camden and pave the way for the delivery of 'at the very least, the level of older person and first time buyer housing required by the London Plan'.
- 9.8.4 The next thing to consider is whether plan policies in combination lead to a tension with housing objectives, in that their application will hinder housing delivery (market and/or affordable). The majority of plan policies are essentially 'environmental', and hence inherently have some potential to restrict residential development (albeit such developments will often be extensions to provide additional space for existing households); however, on closer inspection it is clear that the various 'environmental' policies are positively worded such that developers should be confident in the ability to gain permission once criteria are met, and high land values will help to ensure that developers are not discouraged. Perhaps most notably, Policy **OS1** (**Vistas from and to Highgate's Major Open Spaces Fringes of Highgate's Open Space**) seeks to take into account the height, scale, massing and use of materials or function of new development ~~restrict the height of buildings~~; and this is also an aim of several Key Site (**KS**) Policies, albeit they stop short of specifying maximum heights. It is also the case that the three 'economic activity' policies lead to a tension in that they are specifically aimed at preventing conversion of retail, employment and community premises to residential; however, this is clearly justified on the basis that increased residential within these areas would hinder their ability to function as economic and community hubs.



## Conclusions on the draft plan

- 9.8.5 Most, if not all, proposed policies will result in 'population and community' benefits, with positive effects discussed under several other headings (e.g. 'Air quality' above, and 'Transport' below) translating into 'population, housing and community' benefits. There is no need to repeat discussions under this heading, but rather it is appropriate to focus on the performance of the plan in terms of 'housing' objectives. A policy is dedicated to reinforcing the national, regional and local desire to achieve mixed communities - i.e. communities comprising different types of market housing, and also a good proportion of affordable housing - and this is 'a positive', recognising that high land values in the plan area might otherwise act against mixed communities. However, it is also necessary to point out that there are notable tensions between housing objectives and the numerous environmental policies within the plan, which in combination may act to restrain housing delivery (e.g. through restricting building heights).

## 9.9 Transport

- 9.9.1 A plan objective is to 'enhance accessibility to local services and support the community's health, social and cultural wellbeing', with sub-objectives referring to the need to minimise the impact of new traffic arising as a result of development, leave unaffected – or improve – the parking provision for Highgate and promote sustainable modes of transport.
- 9.9.2 A starting point is also an understanding that the nature of Highgate means that the solutions to the problems might be different from the policies adopted across the boroughs as a whole. The Plan area is physically different, being hilly and benefitting from many large open spaces. It also has a different demographic and (as a whole), a lower density of housing and a wide range of street and property types. Other issues stem from poor east to west links, with many survey respondents noting difficulties accessing areas such as Muswell Hill, Crouch End and Hampstead, and Haringey's offices.
- 9.9.3 The difficulty of getting around Highgate was one of the key issues identified during consultation. Driving is often impractical due to parking pressures and cycling and walking unappealing due to various factors, including traffic congestion. Accordingly, new development must successfully link in with, and where possible enhance, the existing local transport infrastructure and not hinder movement across the Plan area.
- 9.9.4 Most notably, Policy **TR14** (Promoting Sustainable Movement) requires all new development to **convenient, safe and well-signed routes, including footways and cycleways designed to appropriate** ~~contribute where appropriate to enhancing the connectivity of the Plan area through the provision of new and improved cycle links, bike parking facilities, footpaths, public transport stops and new through routes. The~~ **widths. The** policy seeks to respond to specific identified opportunities that are not covered by Camden/Haringey policy (given the relatively peripheral nature of Highgate). Also, Policies **TR21** (Movement of Heavy Goods) and **TR32** (**Minimising the Impact of Traffic Arising from New Development** ~~Minimising the Impact of Traffic Arising from New Development~~) are geared towards minimising traffic congestion, and hence in turn should support walking/cycling and use of public transport.

- 9.9.5 Also, 'permeability' is a focus of emerging Key Site Policy, with Policy **KS3** (Highgate Bowl) in particular aiming to enhance the permeability of Highgate for pedestrians, making it easier for people to follow desire lines even across previously privately owned land, for example providing an element of pedestrian access to or across the "Bowl" area in the event that it is redeveloped. However, it is noted that area-wide policy does not include an explicit focus on enhancing green infrastructure such that opportunities for walking/cycling are enhanced.

#### Conclusions on the draft plan

- 9.9.6 The plan is set to have positive effects in terms of encouraging 'sustainable transport', albeit these predicted effects are minor, and the possibility to potentially 'go further' through open space policies has been highlighted. It is noted that an aspiration of the Neighbourhood Forum is to use CIL monies to fund a new orbital bus route that links education and health sites, and so it may be that a future review of the plan can put in place policy that helps to capitalise on the potential benefits (e.g. by supporting new housing along the route).

### 9.10 Overall conclusions on the draft plan

- 9.10.1 The assessment above has highlighted the likelihood of the plan resulting in 'significant positive effects' in terms of climate change adaptation, health and well-being and historic environment / townscape objectives, and notably positive effects are also likely in terms of most other topics. No significant negative effects are predicted, although the assessment has highlighted a number of tensions and/or instances where additional policy might result in more positive effects in terms of specific objectives. Such tensions are inevitable in plan-making, and it will be the role of the Forum to give consideration to 'striking the best balance' when finalising the plan for submission. Perhaps most notably, the Forum should give further consideration to addressing the tension / striking a balance between the objective to maintain local character, and the objective to support the housing delivery that will be necessary to ensure a mixed and balanced community in the long term.

## **PART 3**

### **WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?**

## 10 INTRODUCTION TO PART 3

- 10.1.1 This Part of the report explains next steps (i.e. steps subsequent to ~~consultation on the Pre-submission~~ **submission of the** Plan in-line with Regulation 154 of the Neighbourhood Planning Regulations) that will be taken as part of plan-making / SEA.

## 11 PLAN FINALISATION AND ADOPTION

- ~~11.1.1 **Regulation 15**, of the Neighbourhood Planning Regulations, requires that the Forum submit (to the Local Authority) the 'Proposed' Plan and a 'Consultation Statement'. The Consultation Statement must describe issues or concerns raised through the current consultation and how these were addressed when preparing the 'Proposed Plan' for submission.~~

- 11.1.2 **Regulation 16** then requires that the Local Authority 'publicises' the Proposed Plan so that stakeholders can make representations that may then be considered at Examination. It will be appropriate for the Local Authority to also publicise an updated version of the Environmental Report, with a view to informing representations.

- 11.1.3 **Regulation 17** requires that the Local Authority submits (to the person appointed to carry out the Examination) the Proposed Plan and a copy of any representations which have been made in accordance with Regulation 16. It may be appropriate for the Local Authority to also submit the updated Environmental Report, with a view to informing the Examination.

- 11.1.4 **Regulations 18 and 19** require that, subsequent to the Examination, the Local Authority publishes the Examiner's Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

- 11.1.5 **Regulation 20** states what the Local Authority must do when the plan is 'made' (i.e. adopted). The SEA Statement must be published alongside the made Plan, with a view to providing:

- information on the decision, i.e. an explanation of why the final plan approach was decided-upon in light of SEA and consultation; and
- measures decided concerning monitoring.

## 12 MONITORING

- 12.1.1 At the current stage – i.e. in the Environmental Report - there is a need to present 'a description of the measures envisaged concerning monitoring'. In light of the assessment findings presented in Part 2 of this report, it is suggested that monitoring might focus on -

- Housing mix;
- Basement developments; and
- Employment uses within the three centres.

## APPENDIX I - REGULATORY REQUIREMENTS (1)

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness' of the approach)	i.e. answer - <i>What has Plan-making / SEA involved up to this point?</i> [Part 1 of the Report]
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The likely significant effects associated with the draft plan	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

## APPENDIX II - REGULATORY REQUIREMENTS (2)

Appendix I signposts to broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met.

Regulatory requirement	Discussion of how requirement has been met
<b>Schedule 2 of the regulations lists the information to be provided within the Environmental Report</b>	
<b>“An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes”</b>	Chapter 3 (‘What’s the plan seeking to achieve’) presents this information.
<b>“The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”</b>	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an ‘SA framework’, and this is presented within Chapter 4 (‘What’s the scope of the SA’). Also, more detailed messages from the Scoping Report - i.e. messages established through baseline review - are presented within Appendix III.
<b>“The environmental characteristics of areas likely to be significantly affected”</b>	
<b>“Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC”</b>	
<b>“The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation”</b>	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘SA framework’. The SA framework is presented within Chapter 4 (‘What’s the scope of the SA’). Also, messages from the context review are presented within Appendix III.</p> <p>With regards to explaining ‘how... considerations have been taken into account’, the aim of ‘Part 1’ of the report is to explain how SA - and thus sustainability considerations - has fed-in ‘up to this point’.</p>
<b>“The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)”</b>	<ul style="list-style-type: none"> <li>• Chapter 6 and 7 present alternatives assessment findings (in relation to each of the plan issues that reasonable need to be a focus of alternatives assessment at the current time).</li> <li>• Chapter 9 presents the draft plan assessment.</li> </ul> <p>As explained within the various methodology sections, as part of assessment work consideration has been given to the SA scope, and the need to consider the potential to various effect characteristics/ dimensions.</p>

Regulatory requirement	Discussion of how requirement has been met
<p><b>“The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”</b></p>	<p>Chapter 9 uses <u>underlined text</u> to highlight ‘tensions’ and instances where policy might ‘go further’ in order to better address specific sustainability objectives. The Forum should respond explicitly in each instance, and ultimately be in a position to explain why the preferred approach is justified.</p>
<p><b>“An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”</b></p>	<p>Chapters 5 - 7 deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapters 6 and 7 explain the Council’s ‘reasons for selecting/developing the preferred approach’ in light of alternatives assessment.</p> <p>Methodology is discussed at various places, ahead of presenting assessment findings, and limitations are also discussed as part of assessment narratives.</p>
<p><b>“description of measures envisaged concerning monitoring in accordance with Art. 10”</b></p>	<p>Chapter 12 presents information on monitoring.</p>
<p><b>“a non-technical summary of the information provided under the above headings”</b></p>	<p>The NTS is a separate document.</p>
<p><b>The Environmental Report must be published alongside the draft plan</b></p>	
<p><b>“[A]uthorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.”</b></p>	<p>At the current time, the Environmental Report is published alongside the pre-submission plan, under Regulation 14 of the Neighbourhood Planning Regulations, so that responses might be received and taken into account by the Forum when finalising the plan for submission.</p>
<p><b>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</b></p>	
<p><b>“The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.”</b></p>	<p>The Forum will take assessment findings presented within this report, and consultation responses received on the draft plan (as informed by this report) when finalising the plan for submission.</p>

## APPENDIX III - CONTEXT AND BASELINE REVIEW

As discussed in Chapter 4 ('What's the scope of the SEA?') the SEA scope is primarily reflected in a list of key issues and objectives ('the SEA framework'), which was established subsequent to a review of the 'context' and 'baseline' and also subsequent to consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SEA framework, i.e. serve to identify specific issues that should be a focus of assessment under the framework.

### Air Quality

The National Planning Practice Framework (NPPF) states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in AQMAs is consistent with the local air quality action plan. At the local level both the London Borough of Camden (LBC) and London Borough of Haringey (LBH) are required to monitor air quality, report regularly to Defra and take action where nationally set levels are likely to be exceeded.

The NP area is located within AQMAs for both Nitrogen Dioxide (NO<sub>2</sub>) and particulate matter with a diameter of 10 micrometres (PM<sub>10</sub>) and monitoring<sup>11</sup> has shown that in some areas of the NP boundary levels of NO<sub>2</sub> can be double the legal limit set to protect human health. Therefore, it is important for the NP to address the following key points:

- Reducing the need to travel by motorised modes of transport through sustainable patterns of land use and development;
- Incorporating the requirement for sustainable building design into policies;
- Alleviating traffic congestion; and
- Considering the location of sensitive receptors, such as children in schools or the elderly in care homes, and their proximity to busy road junctions.

### Biodiversity

The EU Biodiversity Strategy<sup>12</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'. This drive is supported by the NPPF which outlines the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible. Additionally, The Natural Environment White Paper (NEWP)<sup>13</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. At the local and regional (London) level, there are policies and commitments outlined within the LBC's Core

<sup>11</sup> Camden Green Party (2013) 'Citizen Science' Air Pollution Monitoring in Highgate Ward [online] <https://camden.greenparty.org.uk/campaigns/air-pollution.html> [accessed September 2015].

<sup>12</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: [http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1\\_EN\\_ACT\\_part1\\_v7%5b1%5d.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf)

<sup>13</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>



Strategy<sup>14</sup>, the LBH's Local Plan<sup>15</sup> and the London Plan<sup>16</sup> to protect, enhance and create biodiversity.

The NP area contains several Sites of Importance for Nature Conservation (SINC), including Highgate Cemetery; Highgate Golf Course; and Parkland Walk, Queen's Wood and Highgate Wood. Ken Wood, Highgate Wood and Queen's Wood are all classified as areas of Ancient and Semi-Natural Woodland within the NP area. Further to this, there are a range of classified habitats within the NP area, as demonstrated in

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<sup>14</sup> London Borough of Camden (2010) Core Strategy 2010-2025

<sup>15</sup> London Borough of Haringey (2013) Local Plan: Strategic Policies

<sup>16</sup> Mayor of London (2015) The London Plan: The Spatial Development Strategy for London Consolidated with Alterations Since 2011

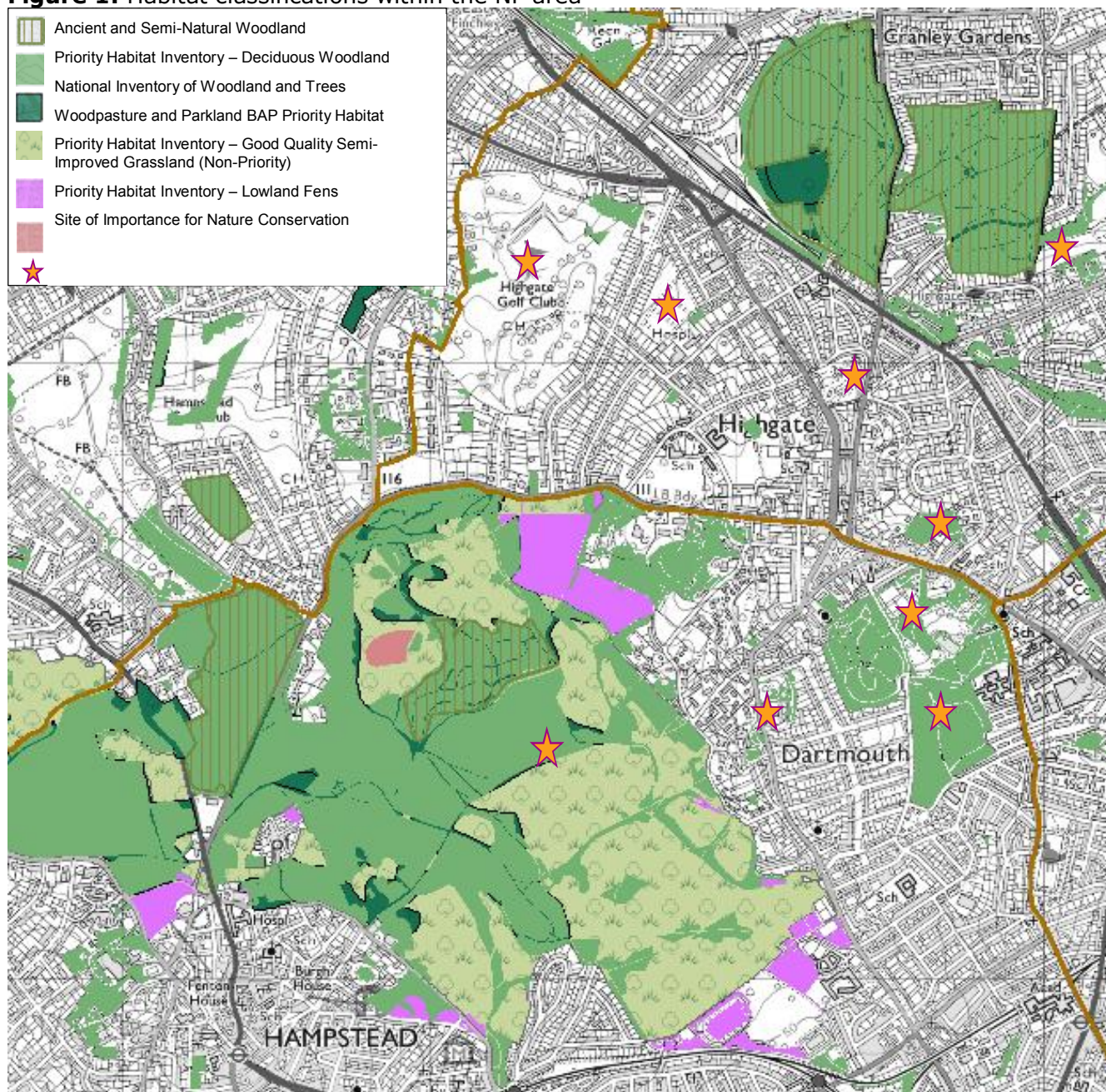
Figure 1.

Sites of biodiversity importance have the potential to come under increasing pressures from an increase in both the NP area and London's population and associated development. However, as shown in

Figure 1, there are extensive areas of biological importance within the NP area which will be protected and where possible enhanced, in line with national and local policy. Therefore, to support this, the NP should consider the following points:

- The protection and enhancement of the SINC;
- The protection and enhancement of areas of open space; and
- The protection and enhancement of semi-natural habitats and priority habitats.

**Figure 1: Habitat classifications within the NP area<sup>17</sup>**



### Climate Change

Tackling the issues presented by climate change and mitigating its effects is a key consideration within the EU and wider international community. The National Planning Policy Framework (NPPF) promotes a move towards a low carbon future, by reducing the level of greenhouse gas emissions and notes that development should take place away from flood risk zones. This is also supported by the Climate Change Act (2008) which sets a target for the UK to achieve a 50% reduction in Carbon Dioxide (CO<sub>2</sub>) emissions from a 1990 baseline by 2050. These national objectives are supported by policies set out at the local and regional level.

<sup>17</sup> Department for Environment Food and Rural Affairs (Defra) (2015) Magic Map [online] <http://www.magic.gov.uk/> [accessed November 2015]

Housing development will have a long term minor negative impact on flood risk zones; however, this can be mitigated by use of SuDS and well planned green infrastructure, which is to be encouraged, given that the parish has experienced significant flood events in the past, and due to the proximity of the parish to various water sources.

Therefore, in light of the challenge posed by climate change, the priorities of the NPPF, and other regional and local planning documents and policies, the NP should seek to:

- Limit the increase in the carbon footprint of the NP area as a result of population growth;
- Support reduced car dependency and increased walking, cycling and public transport use;
- Improve green infrastructure networks in the NP area to support adaptation to the potential effects of climate change; and
- Ensure that the risk of flooding is not increased (either within the NP area or downstream) and where possible reduce flood risk.

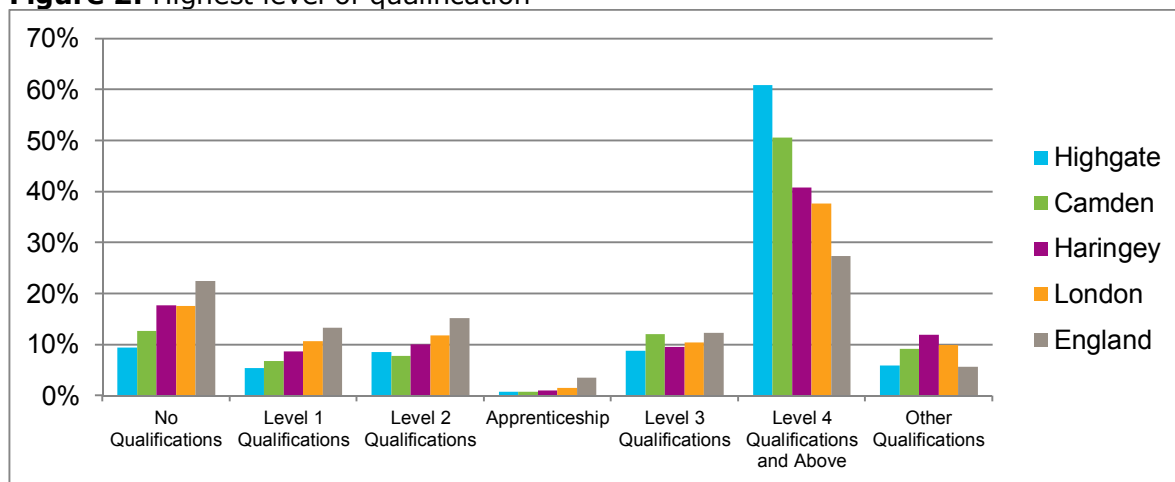
### Economy and Enterprise

The NPPF states that the planning system can make a contribution to building a strong, responsive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure. At the local level, both the LBC and LBH seek to promote business opportunities for sustainable employment and enterprise and to extend training so that people can improve their skills.

The level of economically active residents in Highgate (75.5%) is significantly higher than the LBH (71.6%), LBC (68.9%), London (71.7%) and national (69.9%) averages<sup>18</sup>. Likewise, Highgate has significantly lower proportions of economically inactive residents.

Highgate has a significantly higher percentage of residents aged 16 and over that have attained Level 4 Qualifications and above (61%) than LBC (50.6%), LBH (40.8%), London (37.7%) and national (27.4%) averages, as shown in Figure 2.

**Figure 2:** Highest level of qualification<sup>19</sup>



Despite the strengths of the proportion of those economically active in Highgate, and their level of qualification, it is worth noting that from April 2004 to the end of October 2013 (i.e. before the change to the permitted development right) over 600,000 ft<sup>2</sup> of office space was

<sup>18</sup> ONS (2011) Census 2011, Economic Activity (QS601EW)

<sup>19</sup> ONS (2011) Census 2011, Highest Level of Qualification (QS501EW)

lost within Camden Borough, though this was in a managed manner. Any further loss, especially where it is not accompanied by any strategic gains, could seriously undermine the long term attractiveness of the area as a location for business. Since the change to development rights, a further 257,000 ft<sup>2</sup> of B1aa office space has been lost in less than 12 months. Using an industry standard multiplier of one person to every 100 ft<sup>2</sup> this equates to some 2,570 jobs.<sup>20</sup>

Therefore, considering the above points shows that there are opportunities to capitalise on the existing economic strengths of the local area, and also to address some of the issues that exist (e.g. in relation to the role of centres as hubs of economic activity), the NP should seek to support the economy and provide access to employment opportunities.

**Health and Wellbeing**

A core planning principle outlined within the NPPF is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’. The Department of Health Guidance on ‘Health in SEA’ suggests the use of a broad definition of ‘health,’ taking into account social determinants. This implies that plans and programmes may be able to influence health in many ways, both directly and indirectly, and will often be synergistic, with different factors combining to bring benefits or adverse impacts.

As highlighted in Table , general health across the Highgate Wards’ and Camden is broadly favourable compared to the LBH, London and England averages.

**Table 1: General Health<sup>21</sup>**

Health	Highgate	Camden	Haringey	London	England
Very Good	55.0%	53.4%	49.6%	50.5%	47.2%
Good	31.0%	30.6%	33.6%	33.3%	34.2%
Fair	9.4%	10.4%	11.2%	11.2%	13.1%
Bad	3.5%	4.2%	4.2%	3.7%	4.2%
Very Bad	1.1%	1.4%	1.5%	1.2%	1.2%

No census data exists for the NP area for life expectancy and health indicators; however at the borough level the 2015 Health Profile shows that life expectancy is 81.1 years for men and 86.0 years for women in the LBC and 80.1 years for men and 84.7 for women in the LBH; above the national average of 79.4 years and 83.1 years, respectively.<sup>22</sup>

In common with many other areas, the NP area will experience an ageing population, which will have implications for health service provision and the provision of other services, facilities and amenities.

Therefore, it is important for the NP to consider these key points:

- Promote accessibility to a range of leisure, health and community facilities, for all age groups; and
- Provide and enhance the provision of community access to green infrastructure, including opportunities for active recreation (e.g. walking and cycling).

<sup>20</sup> LB Camden (2014) Office to Residential Permitted Development Rights Impact Study [online] available at: [http://www.camdentownunlimited.com/sites/default/files/office\\_to\\_residential\\_impact\\_final\\_report.pdf](http://www.camdentownunlimited.com/sites/default/files/office_to_residential_impact_final_report.pdf)

<sup>21</sup> ONS (2011) Census 2011 General Health, 2011 (QS302EW)

<sup>22</sup> Public Health England (2015) Health Profile 2015 [online] [http://www.apho.org.uk/resource/view.aspx?QN=HP\\_REGION\\_H](http://www.apho.org.uk/resource/view.aspx?QN=HP_REGION_H) [accessed August 2015]

## Historic Environment and Landscape

Within the NPPF it is stated that heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a manner appropriate to their significance, taking account of the wider social, cultural, economic and environmental benefits of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness. This is supported at the local and regional level, with commitments to preserve, and where possible, enhance the state and setting of heritage assets and landscapes.

The layout of Highgate largely retains its 17<sup>th</sup> and 18<sup>th</sup> century layout and design, with the majority of the village centre built on a domestic scale of two and three storey Georgian and early Victorian homes.

A key aspiration of the NP is to encourage development that seeks to preserve and wherever possible enhance the unique and historic character of Highgate.<sup>23</sup> There are 231 heritage assets in the NP area, of which 230 are listed buildings (four Grade I, 14 Grade II\*, and 212 Grade II), and the Highgate Cemetery and Waterlow Park are Registered Parks and Gardens). However, it is worth noting that four heritage assets within the NP area are listed on Historic England's Heritage at Risk Register<sup>24</sup>.

New development areas in the NP area have the potential to impact on the fabric and setting of cultural heritage assets. This includes through inappropriate design and layout. It should be noted however, that existing historic environment designations and local plan policies will offer a degree of protection to cultural heritage assets and their settings.

As a result of the heritage assets present within the NP area, there is a need to:

- Preserve and enhance the setting and integrity of cultural heritage assets;
- Support access to the historic environment; and
- Protect and enhance landscape and townscape features.

## Population, Housing and Community

The NPPF states that to 'boost significantly the supply of housing' local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.

The Select Committee on Public Service and Demographic Change report '*Ready for Ageing?*'<sup>25</sup> warns that society is underprepared for the ageing population. The report says that '*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises*'. The report says that the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.

<sup>23</sup> Highgate Neighbourhood Forum (2015) A Plan for Highgate, Draft Highgate Neighbourhood Plan.

<sup>24</sup> Historic England (2014) Heritage at Risk Register [online] available at: <http://risk.historicengland.org.uk/register.aspx?st=a> (accessed August 2015)

<sup>25</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

The LBH Local Plan identifies that the need for affordable housing in the borough currently outstrips supply, with a shortfall in provision of 4,865 units a year, or 52 homes per 1,000 head of population. This rate is higher than the shortfall of Inner London (32 units per 1,000 head of population).<sup>26</sup>

According to the most recent census data available, in 2011 the total population of the combined Highgate Wards was 22,587<sup>27</sup>. This was an increase of 1,785 from the 2001 census, or an 8.9% population growth<sup>28</sup>. The rate of growth in Highgate's population is below the population growth for the LBC and the LBH, as well as London, but is slightly above the national comparator.

Highgate's age structure is broadly in line with the LBC average for the proportion of those within the 0-15 age group, but this is below the average for the LBH, London and England. Highgate also has a lower proportion in the 16-24 age range than any of the comparators, with a higher proportion of those aged 60+ when compared to the LBC, LBH and Greater London.

In light of this information, it is important to consider the following key points:

- Promote the development of a range of high quality, accessible community, cultural and leisure facilities
- Provide an adequate supply of affordable housing
- Support the provision of a range of house types and sizes.

## Transport

Within the NPPF it is stated that in order to minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for 'a balance of land uses'. Wherever practical, key facilities should be located within walking distance of most properties. It is also stated that the transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport), giving people a real choice about how they travel. These approaches are supported both at the local and regional level.

The 2011 Camden Transport Strategy notes whilst the Borough is well served by public transport, the borough faces many transport challenges. In particular there will be a need to support the areas growing population, with this increase expected to place significant extra pressure on the transport network in the borough and surrounding areas.<sup>29</sup>

Whilst residual effects as a result of new development are likely to be mitigated in part by measures outlined in the Borough Local Plans, it is important that new development is situated in accessible locations which limit the need to travel by private car and also address issues of on-street parking causing unnecessary congestion.

It is therefore necessary for due consideration to be given to land use and location of developments to minimise distances travelled and promote the use of sustainable forms of transport.

<sup>26</sup> LBH(2013) Haringey Local Plan: Strategic Policies

<sup>27</sup> Office for National Statistics (2011) Neighbourhood Statistics [online] available at: <http://www.neighbourhood.statistics.gov.uk/dissemination/>

<sup>28</sup> ONS (2011) Census 2011, Population Density, 2001 (UV02)

<sup>29</sup> LB Camden (2011) Camden Transport Strategy and Local Implementation Plan [online] available at: <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/camdens-local-implementation-plan.en> (accessed 03/2014)



## APPENDIX IV - ECONOMIC ACTIVITY ALTERNATIVES

This appendix presents detailed assessment findings in relation to the 'economic activity' alternatives that are a focus of discussion in Part 1 of this report. Specifically, assessment findings are presented in relation to the following alternatives:

**Option 1)** Establish policy specific to each of the three centres within Highgate

**Option 2)** Rely Camden/Haringey Local Plan policy.

### Assessment methodology

For each of the options, the assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives / issues identified through scoping (see Chapter 4) as a methodological framework. **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects.

The assessment takes account of the criteria presented within Schedule 2 of the Regulations.<sup>30</sup> So, for example, account is taken of the potential for effect significance to be a factor of the timescale and reversibility of effects. Cumulative effects are also considered, i.e. the potential for the plan to impact the baseline in combination with other plans, or unplanned activity.

Every effort is made to identify and evaluate effects accurately; however, this is inherently challenging given uncertainty regarding the 'on the ground' implications of policy. The ability to predict effects accurately is also limited by understanding of the baseline.


In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

### Detailed assessment findings

(1) Establish policy specific to each of the three centres within Highgate			
(2) Rely on Camden/Haringey Local Plan policy.			
Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
Air quality	Heavy traffic means that Archway Road is an air pollution hotspot. The draft policy (EA2) would put in place a 'presumption... to retain A1 (shops) and A3 uses (restaurants / cafes)', whereas the emerging Haringey policy (Policy DM53 Development within town centres) aims to ensure that along Archway Rd (which is classed as a Local Centre) no more than 50% of shopfronts are lost to non A1 uses. As such, Option 1 would support A uses, whilst a higher proportion of residential might be expected under Option 2. Residential	★ 1	2

<sup>30</sup> Environmental Assessment of Plans and Programmes Regulations 2004

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
	uses are likely to be most sensitive to air pollution, and as such Option 1 is preferred.		
Biodiversity	No implications.	N/a	
Climate change	All three centres (Highgate Village and Archway Rd in particular) have an extensive residential hinterland, and as long as the vibrancy of these centres is maintained then there will be good potential for residents to walk/cycle to the centres. As discussed above, Option 1 should support a diversity of retail uses in the long term, and as such is the preferred option.	★ 1	2
Economy and enterprise	Emerging Policy EA3 includes a particular focus on maintaining employment uses, as there is a concentration of small workshops and business units that support small/medium enterprises (SMEs), and provision of new units is also encouraged. Also, emerging Policy EA1 states that a change of use away from employment should only be allowed only after having given strategic consideration to impacts on employment opportunities as a whole. The emerging policy approach is therefore welcomed, from and 'economy and enterprise' perspective, and it should supplement the emerging Haringey/Camden policy, which is primarily concerned with considering sites in isolation, and ensuring that a (robust) marketing campaign has demonstrated employment use to be non-viable before a change of use is allowed (see emerging Haringey Policy DM52: Loss of employment land and floorspace).	★ 1	2
Health and wellbeing	Maintaining a diversity of uses within the centres will help to ensure their continued vibrancy and ensure that residents are able to access shops and community facilities. The importance of being able to meet various needs within a single centre is particularly important for the less mobile, including the elderly and those with young children. Furthermore, vibrant centres will act to support a sense of community and support social inclusion.	★ 1	2
Historic environment and landscape	Highgate Village in particular is an important heritage asset, and its continued relevance to a large extent relies on the ability to maintain its historic function as a retail and community centre. On this basis, Option 1 is preferred.	★ 1	2
Population, housing & community	As discussed under 'Health and wellbeing' above, there are wide ranging benefits associated with maintaining the function and vibrancy of the centres. However, another consideration relates to housing needs, and in this sense it can be argued that a more permissive approach - i.e. one that allows for change of use to residential, where it is	=	

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
	demonstrated that retail/employment is non-viable - is appropriate. Taking this into account, it is appropriate to conclude that the alternatives perform on a par.		
Transport	See discussion under 'Climate change', above.		<b>2</b>

Summary

The policies seek to supplement emerging Haringey and Camden policy to a small but notable extent, such that there is additional policy support for maintaining a mix of town centre uses, i.e. supporting retail and employment and restricting residential. For Highgate Village Centre, the policy will also have the effect of tying together Camden and Haringey Policy, ensuring that planning decisions take into account the mix of uses within the centre as a whole (as opposed to the mix of uses within the Camden part or the Haringey part). There are wide ranging community and local economy benefits associated with policy that will maintain the function and vibrancy of centres in the long term, perhaps most notably from a 'health and wellbeing' perspective in that those who are less mobile rely on local centres in order to meet their needs. It is also the case that the centres - and most notably Highgate Village Centre - are heritage assets and their heritage significance is tied to their function. However, there is a tension in that from, a 'housing' perspective, it can be argued that a more permissive approach - i.e. one that allows for change of to residential, where it is demonstrated that retail/employment is non-viable - is appropriate.

N.B. Significant effects are not predicted, hence there is no **red** or **green** shading within the table above.

## APPENDIX V - OPEN SPACE AND PUBLIC REALM ALTERNATIVES

This appendix presents detailed assessment findings in relation to the 'open space and public realm' alternatives that are a focus of discussion in Part 1 of this report. Specifically, assessment findings are presented in relation to the following alternatives:

**Option 1)** Designate open land at Hillcrest Housing Estate as 'Local Green Space'

**Option 2)** Do not designate.

### Assessment methodology

See Appendix IV, above.

### Detailed assessment findings

(1) Designate open land at Hillcrest Housing Estate as 'Local Green Space'			
(2) Do not designate.			
Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
Air quality	No implications.	N/a	
Biodiversity	A Site of Importance for Nature Conservation (SINC) lies along the site boundary, although emerging Haringey Site Allocation Policy for Hillcrest states that any development should 'enhance' the SINC (in-line with emerging DM Policy). As such, direct impacts to the SINC seem unlikely. However, another consideration relates to the possibility that mature trees could be lost that play a role within the local ecological network. Some trees on site may be remnants of the original plantings within the grounds of the early 19 <sup>th</sup> C mansion (Park House) that occupied the site.  In conclusion, designation as Local Green Space (Option 1) is to be supported; however, it is not clear that intensification of the site would necessarily lead to significant negative effects.	★ 1	2
Climate change	No notable implications. Green space is important from a surface water flood risk and therefore climate change adaptation perspective, but there is nothing to indicate that green space here plays a notable role in this respect.	N/a	
Economy and enterprise	No notable implications.	N/a	
Health and	Hillcrest is in an area of deficiency for some types of open space, particularly amenity and play space for the under 5s.	★ 1	2

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
wellbeing	In addition, it is within, or on the boundary of, the deficiency area for sports field provision (Haringey open space and biodiversity Study). The communal gardens of Hillcrest Housing Estate, including an area informally used for ball sports, are used by the residents of Hillcrest’s 116 flats and the wider community. Furthermore, estate residents care for flower borders etc on a volunteer basis and have been the recipients of several grants to make improvements in and around the estate; and there is a regular litter-picking group. On the basis of the discussion above, it is possible to conclude that the existing open space will contribute significantly to the health and wellbeing of local residents (albeit it is recognised that access to open space is only one of very many determinants of health); and a policy that seeks to maintain the open space in the long term will lead to significant positive effects on the baseline. In reaching this conclusion, it is noted that emerging Haringey Site Allocation Policy SA47 states that: <i>“Development will need to ensure that existing play areas are reprovided where this is lost to development.”</i> Also, the emerging Haringey policy states that, as part of any development scheme: <i>“Landscape/open space will need to be improved and subject to improved management.”</i>		
Historic environment and landscape	Hillcrest is part of the Highgate Conservation area, and indeed is within Sub-area 1 ‘Village Core’. The Conservation Area Appraisal <sup>31</sup> notes that the seven housing blocks sit within ‘generous’ and ‘well landscaped grounds’. There are also listed buildings in the vicinity, most notably the ‘internationally celebrated’ Grade 1 listed Highpoint block of flats on the opposite side of the road (North Hill). <sup>32</sup> Emerging Haringey Site Allocation Policy SA47 states that any intensification/development scheme should: preserve or enhance the appearance of the Conservation Area; consider long distance views of the Highpoint building; and facilitate landscape improvements. Nonetheless, it seems that a preferable approach would be to maintain the current configuration of buildings and open space. Careful consideration was given to the design and layout of the estate in 1945, <sup>33</sup> possibly in recognition of proximity to the somewhat ground-breaking Highpoint flats, and as such there is likely to be heritage value in the site layout as it stands.	★ 1	2
Population	As discussed above, under ‘Health and wellbeing’, the	=	

<sup>31</sup> See Sub-area 1 (Parts 2 and 3) at: [www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/design-and-conservation/conservation-areas/character-appraisals/highgate-conservation-area](http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/design-and-conservation/conservation-areas/character-appraisals/highgate-conservation-area) (accessed 12/15)

<sup>32</sup> See [www.haringey.gov.uk/sites/haringeygovuk/files/heritage\\_assets-hillcrest.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/heritage_assets-hillcrest.pdf) (accessed 12/15)

<sup>33</sup> See [www.haringey.gov.uk/sites/haringeygovuk/files/history\\_and\\_creation\\_of\\_hillcrest-hillcrest.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/history_and_creation_of_hillcrest-hillcrest.pdf) (accessed 12/15)

Topic	Discussion of significant effects (and relative merits in more general terms)	Effect categorisation / Rank of preference	
		Option 1	Option 2
, housing & community	<p>existing open and green space is an important community resource. However, another consideration is the acute need for housing and affordable housing. Designating the land as Local Green Space would likely preclude work to explore how the site might be 'intensified' in such a way that much needed housing is delivered. With regards to the tenure mix of any additional housing (in the long term), there is currently some uncertainty. It is noted that the March 2013 version of the Haringey Site Allocation Policy for Hillcrest stated that a requirement would be the delivery of 'new social housing', whilst the latest draft version of the policy refers to 'new affordable housing'.</p> <p>In light of this discussion, it is appropriate to conclude that the alternatives perform roughly on a par.</p>		
Transport	No notable implications.	N/a	

### Summary

Protecting the existing open and green space in the long term could lead to wide ranging benefits. Most significant are benefits to existing residents of the estate (which comprises social housing), but there are also notable benefits from a heritage and biodiversity perspective. As such, a policy to designate Local Green Space (Option 1) is the preferred option when considered in terms of the majority of sustainability objectives. However, there is a draw-back to Option 1 in that it might act to preclude future intensification of the site, i.e. development of some land within the site for housing. Hillcrest is designated in the emerging Haringey' Site Allocations DPD as a site for new housing, to include 'affordable housing', with the designation covering the entire estate and not specifying areas within the estate for development. It may be that the Local Green Space designation could be implemented without conflicting with the Site Allocation (recognising that Haringey Development Management Policy aims to protect open/green space); however, this is unclear.

**APPENDIX VI: RESPONSES TO REGULATION 14 CONSULTATION**

<b>Organisation</b>	<b>Issue</b>	<b>Response</b>
Natural England	<p>there needs to be mention made of the site [Hampstead Heath Woods Site if Special Scientific Interest] as it will form one of the main plan constraints to take into consideration.</p> <p>within Sub-objective 4.4 and 4.5 it is generally stated that biodiversity will be conserved this should be more specific about protecting the SSSI which is within one of the "major public open spaces"</p>	See paragraphs 9.3.2 and 9.3.3.
Unknown (from HNP Consultation Statement)	<ul style="list-style-type: none"> <li>• HNP's failure to undertake or provide a Sustainability Appraisal and an EIA/SEA screening assessment.</li> <li>• The failure to provide a SA/SEA Screening for the Plan (Omved).</li> </ul>	See paragraphs 3.1.6 – 3.1.7 and Figure 4.2
Michael Boroughs	<p>There is no evidence that HNP has been assessed to determine whether it is likely to have significant environmental effects. There is no screening assessment along the lines required by Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. This is important because, if likely significant environmental effects are identified, an environmental report must be prepared in accordance with paragraphs (2) and (3) of Regulation 12. Obviously this should be undertaken early in the plan-making process so that the results can be incorporated in the Plan – retrospective consideration would simply be a cosmetic exercise.</p> <p>21. We object to HNP's failure to undertake or</p>	



	provide a Sustainability Appraisal and an EIA/SEA screening assessment, which is a fundamental objection that probably requires work on the HNP to recommence from the start.	
Camden	The protection / addition of A uses is likely to offer positive effects with regard to Air Quality as people will have greater opportunities to access the town centre by walking / cycling	See paragraph 9.2.5.
Haringey	It would be helpful if the SA [sic] clarified in the options analysis whether the baseline alternative of Haringey Local Plan policy includes adopted Local Plan policy, emerging Local Plan policy, or both	The baseline, for the purposes of development plan policy, has referred to the adopted plans for London, Camden and Haringey.
	The Pre-submission version of the Site Allocations DPD identified Hillcrest as SA44	Amended

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