

Appendix 2.1- Comments on the Development section (DM1-DM13) of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

General Comments on the Development section of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
421	DM20	Historic England	Design	In the last sentence we would suggest the following amendment to reflect NPPF paragraph 58; <i>....and avoid harmful impacts, especially to amenity of neighbouring buildings, and local character and heritage assets.</i>	Agreed. Action: Amend text in introduction paragraphs with suggested wording.

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Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
608	DM21.	Home Builders Federation	Building standards	We should flag-up at this juncture that the Council should have regard to the Government's <i>Housing Standards Review</i> and the recently published accompanying Written Ministerial Statement (published 25 March 2015). If the Council is proposing to introduce standards that exceed the new national Building Regulations it will need to ensure that it has met the requirements set out in the <i>Housing Standards Review: Technical Consultation</i> , DCLG September 2014. Any other construction standards will not be permitted. The Council will be aware that the Mayor is also required to take the provisions of the Government's Housing Standards Review into account and he is preparing additional alterations to the London Plan to take this into account (see paragraph 0.16H of the London Plan). The Council should monitor these developments. It may need to re-test the applicability of these London Plan policies (i.e. the tests relating to the justification/viability/affordability for the optional water and space standards) in the context of Haringey and what effect the application of these London Plan policies may have for the delivery of housing.	The Council is not proposing to introduce local standards that exceed the national Building Regulations. The Council will continue to monitor alterations to the London Plan to take account of any changes and ensure conformity with it.
592	DM22.	John Crompton, Chair, Muswell Hill CAAC	Conservation	Does there need to be something to say that in the case of a building which makes a negative contribution to a CA (possibly because it is of a markedly different type of building) that the opportunity should be taken to rectify this?	DM12 covers management of the historic environment and seeks to ensure that new development conserves and enhances the significance of heritage assets and their setting. The policy will be amended as suggested. Action: Amend DM policies to clarify Council's support for redevelopment of buildings or sites where these detract from the character of conservation areas.
592	DM23.	John Crompton, Chair, Muswell Hill CAAC	Consultation on applications	Engagement should be commensurate –for an ordinary householder application it would be with neighbours rather than the community.	Noted. The Council's approach to consultation on planning applications is set out in Haringey's adopted Statement of Community Involvement.
421	DM24.	Historic England	Design	Amend the sub point a) to reflect NPPF paragraph 58 and supported by the Councils Urban Characterisation Study (UCS);	The term local character includes consideration for historic character. Further details in this regard are set out in Policy DM12,

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				<i>Make a positive contribution to a place, improving the local and historic character, and quality of an area</i>	which covers management of the historic environment.
409	DM25.	Metropolitan Police – Designing Out Crime Officer	Design & Layout	Ensure measures to "design out crime" are included in any major new projects across Haringey Borough and that the standards of the Secured by Design Scheme are also applied.	Compliance with Secured by Design principles is already set out in Policy DM2 and applies to all development.
409	DM26.	Metropolitan Police – Designing Out Crime Officer	Design & Layout	Early consultation with the Designing Out Crime Officers of the Metropolitan Police is beneficial to ensure that such measures are incorporated and our advice is free and impartial.	Noted.
264	DM27.	Gardens Residents' Association	Design principles	Clarity from the council on how these proposals are made and by whom. Is this carried out in-house or have design professionals been consulted? Many aspects of the 'Design Principles' are not suited to their proposed locations and do not take account of site specific issues.	Haringey's Development Charter consists of the principles set out in Policy DM1. The Council has invited representations on the Charter through the Regulation 18 consultation.
268	DM28.	Colin Kerr and Simon Fedida	Development charter	The policy mentions a 'Haringey Development Charter', against which all applications will be assessed. On the basis of this description, the Charter is clearly an important document and pivotal to the operation of the DMP-DPD policies and development in the Borough. The Charter appears not to exist at the time of this consultation. Where is this charter and when will it be consulted on? It is unfortunate that the Council has not seen fit to bring this important document forward for consultation at the same time as the DMP-DPD, to which it clearly relates. Arguably, the DMP-DPD cannot be properly assessed without this Charter to hand.	Haringey's Development Charter consists of the principles set out in Policy DM1. The Council has invited representations on the Charter through the Regulation 18 consultation.
268	DM29.	Colin Kerr and Simon Fedida	Development charter	Recommendation: The 'Haringey Development Charter' be produced and set out for consultation as soon as possible.	Haringey's Development Charter consists of the principles set out in Policy DM1. The Council has invited representations to the Charter through the Regulation 18 consultation.
410	DM30.	North London Waste Authority	High Quality Design	Broadly NLWA considers that this policy is sound. However, NLWA considers that the policy should recognise that design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development. For instance, industrial employment facilities set within designated employment and industrial areas, greater emphasis should be placed on supporting their potential to generate employment and ensuring that they do not give rise to adverse local environmental impacts. Good functional design will be appropriate in such locations and the policy should be applied flexibly and should not be used to impose onerous and costly requirements on such development.	The Council considers that all new development should positively respond to the principles of Haringey's Development Charter, irrespective of the proposed land use and location. The policy is sufficiently flexible to allow consideration of functional design requirements.
610	DM31.	Turley on behalf of St. William	Increased flexibility	We generally support and agree with the principles set out in draft Policy DM 1 on Delivering High Quality Design. However, we consider that Part C of the Policy which states ' <i>confidently address feedback from local consultation</i> ' be revised to include the phrase 'where feasible'. Although we acknowledge the importance of feedback from the local community, it may be unviable to incorporate suggested amendments into future proposals. The rewording of this policy will provide applicants with sufficient flexibility in their approach to future development proposals that may come forward at the site.	The Council considers the policy allows sufficient flexibility for development proposals to take account of consultation feedback. The policy seeks to ensure that applicants positively engage with the local community in delivering viable schemes that are policy compliant.

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730	DM32.	Parkside Malvern – Marcus Ballard	Open Space	Much higher priority must be given to the creation of high quality open space around buildings.	Provision of open space is addressed in draft Policy DM26. However the Council considers there is scope for further policy in regard of privately owned public space, including open space, to complement the draft policies.
659	DM33.	Haringey Federation of Residents Associations (HFRA)	Our Tottenham Charter	PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE: All planning policies must: safeguard and value heritage buildings, including those outside Conservation Areas; ensure that heritage-led regeneration benefits Tottenham residents in the short, medium and long term, and doesn't lead to the kind of gentrification which forces people out of Tottenham. We also need to identify and improve quality of design, amenity and sustainability standards for all new development.	Noted. DM12 covers management of the historic environment and seeks to ensure that new development conserves and enhances the significance of heritage assets and their setting.
372	DM34.	Highgate Society	Policy implementation	There have been failures to implement findings of the Design Panel, concerns raised in local consultation have not always been addressed and there has been inadequate respect for the historic environment, in particular conservation areas and important open spaces, despite the existence of strong Conservation Area Appraisals. It is hoped that policy will be fully implemented and enforced.	Noted. A new Quality Review Panel has been established to help ensure high quality design is delivered in the borough. Haringey's Development Charter will require proposals to confidently address feedback from public consultation and DM1, once adopted, will be a material consideration in planning decisions. The Council will monitor the implementation of the Local Plan through the Authority Monitoring Report process.
410	DM35.	North London Waste Authority	Safeguarding of industrial land	Given the increasing need for local employment in Haringey, in particular as the population of the area increases and given the pressures on employment land for other uses, the NLWA supports the Council's proposals to safeguard land for employment / business use but considers that the policies need to be strengthened and thereby increase the protection for employment land. In particular, the Authority considers that the policy should be clarified to ensure that DEA sites may, subject to local assessment of potential environmental and community impacts, be used for a full range of employment use, including industrial activities (B1c / B2 and equivalent sui generis uses).	The Council welcomes NLWA's support to safeguard land for employment. London Plan policy 2.17 and paragraph 2.79 specifies the broad industrial type activities suitable within SIL designations, whilst Strategic Policy SP8 clarifies the range of employment and other uses suitable for both Locally Significant Employment Sites and Local Employment Areas. The Council does not consider it necessary to reiterate or expand on these further in the Development Management policies.
372	DM36.	Highgate Society	Support	Policy supported.	The Council welcomes support for this policy.
410	DM37.	North London Waste Authority	Uses of employment land	The Authority wishes to emphasise the importance of clarifying the policy so that sui generis uses which are equivalent to B class uses are explicitly supported within employment areas.	London Plan policy 2.17 and paragraph 2.79 specifies the broad industrial type activities suitable within SIL designations, whilst Strategic Policy SP8 clarifies the range of employment and other uses suitable for both Locally Significant Employment Sites and Local Employment Areas. The Council does not consider it necessary to reiterate or expand on these further in the Development Management policies.

Comments on DM2 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
372	DM38.	Highgate Society	Amenity	"Appropriate levels of daylight and sunlight" should be expanded and explained	Agreed. Action: Amend supporting text to provide further guidance on requirements sunlight and daylight.
569	DM39.	Enid Hunt,	Backland development	There do not appear to be specific guidelines for backlands sites, to replace the excellent SPG 3c which was drafted but not adopted.	Noted. The NPPF and London Plan provide appropriate policies which enable boroughs to resist inappropriate development on

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		local resident		In particular the guidelines in para 5 (Design Issues) do not appear to be covered.	residential gardens, where justified in light of local circumstances. Action: New policy on infill, backland and garden land development.
268	DM40.	Colin Kerr and Simon Fedida	Character of development	Character should be guided by HUCS. As discussed HUCS is inaccurate in at least one area (Station Road/Barratt Ave N22). Recommendations as per Alt56 comments. Review and amend HUCS.	Noted. This is UCS is a borough wide study. The data is generated via LIDAR which takes into account building height rather than the number of stories. It therefore may not necessarily account for certain building typologies such as Victorian terraces which may be taller than more modern three story buildings. When the council does allocate a site for development the heights are checked on site to ensure any proposed development is based on accurate data.
268	DM41.	Colin Kerr and Simon Fedida	Daylight	The policy states that 'proposals should ensure appropriate levels of daylight and sunlight...'. It would be helpful if the policy pointed at the daylight standards or policies that it has in mind as 'appropriate', for example, The London Plan Housing SPG, British Standards, or even, Haringey's own standards. Recommendation: The policy DM2-E should indicate which daylight and sunlight standards or planning policies will be relevant in the evaluation of the 'appropriate levels of daylight and sunlight' in the assessment of proposals.	Agreed. Action: Amend supporting text to provide further guidance on requirements for sunlight and daylight.
268	DM42.	Colin Kerr and Simon Fedida	Daylight	The policy states that 'For example, a kitchen does not need to (be) naturally daylit or naturally sunlit'. This is flatly contradicted by the London Mayor's Housing SPG, Good Practice Standard 5.5.2, page 72, and para 2.3.39, page 72, which states that: 'The Code for Sustainable Homes requires a minimum average daylight factor of 2% in kitchens and 1.5% in living rooms, dining rooms and bedrooms in order to achieve credits. These measures define a minimum acceptable level to make an interior feel day-lit, but they do not guarantee a comfortable level of light for a range of daily activities. Good practice standards 5.5.1 and 5.5.2 seek to achieve that higher level of comfort.' Recommendation: As the DM2 text para 2.17 currently stands it is against the London Plan and its SPGs. The text should be amended to bring it into concordance with the higher level plan.	Noted. Action: Amend supporting text to ensure it is consistent with the Mayor's Housing SPG and Good Practice Guide.
421	DM43.	Historic England	Design	Amend the sub point A. to include the following additional requirement to reflect NPPF paragraph 58 and supported by the Councils UCS; <i>contextual features and patterns of heritage interest</i>	DM12 covers management of the historic environment and seeks to ensure that new development conserves and enhances the significance of heritage assets and their setting. This policy will be considered in conjunction with DM2.
268	DM44.	Colin Kerr and Simon Fedida	Development charter	The policy mentions a 'Haringey Development Charter', against which all applications will be assessed. The Charter appears not to exist at the time of this consultation. Arguably, the DMP-DPD cannot be properly assessed without this Charter to hand. Recommendation: The 'Haringey Development Charter' be produced and set out for consultation as soon as possible	Haringey's Development Charter consists of the principles set out in Policy DM1. The Council has invited representations to the Charter through the Regulation 18 consultation.
258	DM45.	Ladder Community Safety Partnership	Development design	Proposed policies (p5-28) generally offer helpful detail and clarification of Saved UDP3, 7, 10, 11 regarding design, privacy, tall buildings etc. However, our confidence in these policies is undermined by statements like the following: ' <i>whilst not having a "level site" may seem to make it more difficult to build, changes in levels can be exploited to squeeze in more accommodation with less impact on neighbours ...</i> ' (2.10, p8). This sounds more like a sales pitch by an ambitious developer rather than the considered	The Council will seek to optimise the use of land to deliver the spatial strategy and meet identified needs, including for housing. Council agrees this objective was not appropriately represented in the supporting text. Action: Delete paragraph 2.10.

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				policy of a local authority. We do not believe that squeezing in accommodation should be a criterion put forward by a responsible Council as part of its planning policy and we are concerned that this frame of mind will undermine the need for a robust and objective examination of developers' proposals in the future.	
372	DM46.	Highgate Society	Document formatting	Map is of poor quality and it is difficult to read	Council recognises improvements could be made to map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future. Action: Amend map to improve image quality
740	DM47.	Hornsey Historical Society – David Frith	Height	It should be made clear that a building of 10 storeys high would not necessarily be acceptable anywhere in the Borough, as in many parts of Haringey 10 storeys would be well above the general height of surrounding area and such a building would conflict with policy in DM 2 A(a) which requires development proposals to be appropriate to their locality having regard to, inter alia, building heights.	The Council's definition of tall buildings is set out in the Strategic Policies Local Plan. It is recognised that tall buildings may only be appropriate in certain locations within the borough. Relevant proposals will be assessed against the policy on tall and taller buildings, which the Council considers does not conflict with DM2.
624	DM48.	Tottenham & Wood Green Friends of the Earth	Landscaping	Development proposals should demonstrate how the landscaping and planting of the development site responds to: a. Landform; b. levels, slopes and the fall of the ground; c. Trees on and close to the site; d. Landscaped boundary and treatments; and e. Any other significant biodiversity (including prioritising native over invasive species) on or close to the site.	The policy for protecting and making provision for new and enhanced biodiversity is set out in the adopted Policy SP13, which will need to be considered in conjunction with DM2.
372	DM49.	Highgate Society	Local character, character typologies	Map 2.1 - this indicates that much of Highgate is urban in character. Whilst it is accepted that small areas are urban in character, most of the Highgate area is most decidedly not and the Society strongly objects to designation of much of its area as urban. Large parts of Highgate, designated as urban, were built in the Edwardian and early 20 th Century period, with wide frontage semi detached or linked semi detached houses and large gardens; the village itself retains a distinct and very definable country village character, and most of the remainder of the area is demonstrably suburban or even semi-rural. This definition should be altered to suburban to avoid applications for inappropriately high densities which would profoundly change the character of the area and cause demonstrable harm under the NPPF.	The methodology used in the Urban Characterisation Study was applied consistently across the whole borough and as such the study determined much of Highgate to be urban in character. The study did recognise the parts of Highgate which characteristically are suburban. Character setting is only one consideration when determining an appropriate density for a development. Development densities in Highgate will also need to consider policies in the Development Management development plan document for example managing the historic environment, design standards and quality of life and delivering high quality design.
372	DM50.	Highgate Society	Secure by design standards	The rigid application of Secure by Design can lead to bland and forbidding schemes. Secure by Design should be used sensitively and should not override national and local conservation and design policies.	Noted. The requirements for Secure by Design should not be considered in isolation. All development will be required to positively contribute to local character. The Council considers the policy is consistent with the NPPF and in general conformity with the London Plan.

Comments on DM3 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
375	DM51.	Hillcrest Residents	Amenity	How would this policy influence privacy and overlooking requirements in an estate environment, where there is often no	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent

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		Association		defined 'front' and 'back'? it could be argued that overlooking windows on an estate face each other across a public space, however, this is not the same as facing across a street and the privacy requirements should still be applied.	overlooking. The policy sets requirements to ensure that new development is designed in a way that protects amenity, irrespective of the development typology.
375	DM52.	Hillcrest Residents Association	Amenity	Suggest rewriting the policy to clarify the definition of 'public space' and include a commitment to protecting rights of light and privacy on housing estates.	Rights to Light are covered by separate legislation and outside the scope of the Local Plan. However, the DM Policies set out the Council's approach to protect amenity.
375	DM53.	Hillcrest Residents Association	Amenity	In the case of infill development 'new' overlooking is of a different quality to planned overlooking in new build developments.	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. The policy sets requirements to ensure that new development is designed in a way that protects amenity, irrespective of the development typology.
375	DM54.	Hillcrest Residents Association	Amenity	Suggest additional policy offering consideration of overlooking in case of infill development.	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. The policy sets requirements to ensure that new development is designed in a way that protects amenity, irrespective of the development typology.
616	DM55.	CgMs on behalf of Parkstock Ltd	Facing habitable room separation	<p>Although we acknowledge the requirement to provide a 20m separation distance between facing 1st floor habitable room windows, we strongly question the requirements within supporting para. 2.20.</p> <p>Para. 2.20 requires an additional distance of 10m for each additional floor i.e. a minimum of 30m between facing 2nd floor habitable room windows etc. We are of the opinion that such additional requirements are both onerous and unnecessary to protect privacy and overlooking. Such distances will render a number of development sites within an urban context undeliverable and will also adversely impact on the delivery of appropriate high density schemes.</p> <p>A general rule of 18m – 20m between facing habitable rooms is appropriate to protect existing residents and overlooking and any other requirements are considered to be onerous and excessive.</p>	<p>The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach.</p> <p>Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.</p>
610	DM56.	Turley on behalf of St. William	Increased flexibility	<p>Whilst we agree with the principles set out in Policy DM 3 regarding privacy and protection from overlooking, we consider that this policy should be revised to provide a sufficient amount of flexibility. We find the detailing of the policy to be too prescriptive that will limit development opportunities on constrained sites which are often found in urban areas. Developments should be assessed on a site by site basis.</p> <p>One of the broader policies that this document seeks to address is '<i>ensuring that new developments have high-quality building design</i>'. This is reiterated in Policy DM 1 Part A which states that: '<i>the Council expects proposals to be design-led, and will support proposals for new development that: make a positive contribution to a place, improving the character and quality of an area</i>'. We consider the approach detailed in the supporting text for Policy DM 3 to be contrary to this and has the potential to compromise design quality and standards. Proposals should be considered on their own merits on a case by case basis. This will allow developers to demonstrate through design led solutions, that privacy and protection from overlooking are maximised on site.</p>	<p>The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach.</p> <p>Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.</p>

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592	DM57.	John Crompton, Chair, Muswell Hill CAAC	Noise/ odour	Suggest adding something about noise and smells.	This matter is addressed with the DM Policy on Environmental Protection.
694	DM58.	Iceniprojects on behalf of Berkeley Homes	NPPF consistency	<p>Policy DM3 is unsound as it is not justified or consistent with national policy.</p> <p>While it is agreed that dwellings should provide a reasonable amount of privacy to the residents and neighbouring properties, this needs to be considered in context and on a site by site basis Haringey is a London borough which has developed organically overtime. This has created a rich fabric of urban grain, plot widths and development pattern, where distance between facing habitable rooms can be a lot less than 20m. For example the width of a typical Victorian street (with front bedrooms facing each other) is typically 13m.</p> <p>An arbitrary rule of 20m is ineffective and is not justified by the evidence base. It does not take account of site characteristics, such as topography, orientation of buildings and design features, and would lead developers to building taller, where this might not be the most appropriate design-led solution for the site.</p> <p>Furthermore, the borough has an ambitious strategic housing target, which it rightly aims to meet and exceed. Applying rigid policies such as this, will inevitably hinder the Council's delivery of housing including affordable housing A proper application of Policy DM1 and DM2 would make this policy redundant. It should be deleted.</p>	<p>The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach.</p> <p>Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.</p>
260	DM59.	Catalyst Housing (CgMs Consulting)	Privacy	<p>Although we acknowledge the requirement to provide a 20m separation distance between facing 1st floor habitable room windows, we strongly question the requirements within supporting para. 2.20.</p> <p>Para. 2.20 requires an additional distance of 10m for each additional floor i.e. a minimum of 30m between facing 2nd floor habitable room windows etc. We are of the opinion that such additional requirements are both onerous and unnecessary to protect privacy and overlooking. Such distances will render a number of development sites within an urban context undeliverable and will also adversely impact on the delivery of appropriate high density schemes.</p> <p>A general rule of 18m – 20m between facing habitable rooms is appropriate to protect existing residents and overlooking and any other requirements are considered to be onerous and excessive.</p>	<p>The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach.</p> <p>Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.</p>
265	DM60.	NHS Property Services (Savills)	Privacy	<p>NPPF para 56, FALP 3.5 seek good quality design. Mayors housing design guide states that adhering rigidly to these measures can limit variety and sometimes unnecessarily restrict density. Whilst general support is given for draft Policy DM18 and the aspiration to deliver high quality residential accommodation that offers privacy for residents and neighbouring properties, these representations object to the setting of a minimum separation</p>	<p>The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach.</p> <p>Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good</p>

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				distance of 20m. In line with the guidance within the Mayor's Housing Design Guide the setting of minimum separation distances can unduly restrict developed. In urban locations, such as London, there are a host of design measures that can be incorporated into schemes to ensure good quality residential amenity at separation distances of significantly lower than 20m, including opaque glazing and angled window openings.	practice guidance.
265	DM61.	NHS Property Services (Savills)	Proposed wording change	All dwellings should provide a reasonable amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development, including a distance of no less than 20m between facing 1st floor habitable room windows of neighbouring homes.	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach. Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.
628	DM62.	DP9 on behalf of Tottenham Hotspur Football Club	Separation distances	20m between facing 1 st floor habitable room windows is too onerous in high density locations. 16-20m recommended.	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach. Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.
629	DM63.	DP9 on behalf of undisclosed	Separation distances	20m between facing 1 st floor habitable room windows is too onerous in high density locations. 16-20m recommended.	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach. Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.
698	DM64.	Savills on behalf of the London Diocesan Fund	Separation distances	20m separation between facing windows too restrictive	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach. Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.
610	DM65.	Turley on behalf of St. William	Separation distance	Specifically, paragraphs 2.20 to 2.24 require minimum distances of 20 metres between habitable rooms facing each other where they are at the first floor level and 30 metres at the second floor level (with an additional 10 metres distance for each additional floor). We consider that this approach will fail to optimise the development potential of sites in Haringey and is too restrictive and prescriptive. Residential development of 5-8 storeys is common in Haringey and we do not consider that such developments would need to be 50-80 metres apart from existing residential buildings, where 20-30 metres are more than adequate, even for tall buildings, where they are carefully designed. Therefore, we consider that the policy should be amended to allow sufficient flexibility for applicants.	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach. Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.
372	DM66.	Highgate Society	Support	Policy is welcomed.	Support for policy is welcomed.

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584	DM67.	Rapleys on behalf of Lasalle Investment Management , long leaseholders	Unnecessary	We consider that it is unnecessary to prescribe a privacy distance and design to make the policy effective as currently worded in Policy DM3 and supporting paragraphs 2.20-2.23. As there is detailed design guidance on housing contained within the Mayor's Housing SPD, and the DMP Policy DM18 (A) seeks to protect the privacy and amenity of neighbouring uses, we consider that Policy DM3 is unnecessary.	The policy is intended to protect amenity, ensuring adequate separation distances between neighbouring properties to prevent overlooking. However it is recognised that policy objectives can be achieved with a less prescriptive approach. Action: Amend policy to allow greater flexibility for design considerations on a case by case basis, having regard to good practice guidance.
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Comments on DM4 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
584	DM68.	Rapleys on behalf of Lasalle Investment Management , long leaseholders	Not NPPG compliant	We object to the policy requiring major development proposals to consider how the scheme can contribute to public art. The online national planning practice guidance advises that public art is not necessary to make a development acceptable in planning terms. Whilst opportunities for public art may be considered as part of the public realm, where appropriate and viable, it should not be expressed as a policy requirement for major development proposals to consider " <i>how they contribute to public art</i> ". We therefore request that this policy is deleted.	The policy does not require major development proposals to contribute to public art in order to make a development acceptable in planning terms. The policy is seeking to ensure applicants consider how proposals can contribute to provision of public art to enhance local distinctiveness and legibility of the development.
608	DM69.	Home Builders Federation	Object	To reflect the advice in the PPG the Council should not seek contributions to public art (ID: 23b-004).	The policy does not require major development proposals to contribute to public art in order to make a development acceptable in planning terms. The policy is seeking to ensure applicants consider how proposals can contribute to provision of public art to enhance local distinctiveness and legibility of the development.

Comments on DM5 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
610	DM70.	Turley on behalf of St. William	Additional tall buildings	In addition, we consider that a further point is incorporated into the Policy to include that the Council will consider proposals for tall buildings that are not within the identified areas shown on Map 2.2 where they can demonstrate that it will not have a harmful impact on their surroundings and that the highest architectural quality is upheld. We find Map 2.2 to be too restrictive and limits the potential for tall buildings in the borough. Furthermore, it does not provide the council or developers with sufficient flexibility in their approach to the siting of tall buildings.	The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy. Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings.
632	DM71.	The Friends of Down Lane Park	Against tall buildings	The proposed tower blocks on the Ashley Road sites (TH2 and TH3) would similarly have a detrimental impact on the park and its positioning in the park. The same is true of the site along Hale Road the current petrol station (TH1), while a ten storey tower block on the Welbourne site next to a park is a mistaken judgement that stands out as starkly as such a building would. The fantasy of twenty storey towers on Watermead Way is an alarming prospect	The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. The policy will be revised to set out further design requirements having regard to the clustering of tall buildings.

				<p>for those who would have to look at them, and a likely nightmare existence for any residents. You don't have to make a lengthy case against tower blocks that are surrounded by other tower blocks, the railway line with tower blocks the other side, and a busy road with tower blocks the other side to begin to recognise what an appalling development that would be.</p> <p>Living in Tottenham Hale, in zone 3 of the transport network, and the Lea Valley in close proximity then residents would expect to see the sky above. Yet, the planned forest of tower blocks will substantially ruin the skyline. The area has the advantage of being open and with a rural landscape context. Yet, the plans to create a Manhattan-esque new entity threatens that and represents an architectural abuse of the area. Seeing the sky is important to human life. There are psychological benefits to feeling the warmth of the sun, as sunshine improves the mind and gives us health benefits. Living and working in the shade of the proposed tower blocks is not healthy or desirable.</p>	<p>Action: Amend policy to include additional criteria on clustering of buildings.</p>
633	DM72.	Anne Gray, Local Resident	Against taller buildings	<p>Such high targets and their concentration in specific areas indicate a dependence on very high-rise building which is quite out of tune with the existing way of life of Londoners. Whilst tower blocks have always been unpopular with families in most parts of England and many of those built in the 1960s-80s have recently been demolished, what is the sense in reverting to this type of development ?</p>	<p>The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. The policy will be revised to set out further design requirements having regard to the clustering of tall buildings.</p> <p>Action: Amend policy to include additional criteria on clustering of buildings.</p>
628	DM73.	DP9 on behalf of Tottenham Hotspur Football Club	Boundary amendment	<p>Generally supports the thrust of the policy, but Map 2.2 should be amended to be less prescriptive along the lines of the currently consented schemes, and allow new development to be taller than that currently permitted.</p>	<p>Council welcomes support for the policy. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy.</p> <p>Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings.</p>
367	DM74.	Patricia Prichard	Building height	<p>Object to proposals to build high rise developments anywhere in Haringey and especially in Highgate, where I feel they damage setting and environment.</p>	<p>The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation. The approach is considered appropriate to deliver the spatial strategy.</p>
367	DM75.	Patricia Prichard	Building height	<p>Lessons can be learned from past disasters in the 1960s based on the illusion that high rises are a solution = they almost never are and they always cause too much wind pollution wherever they exist.</p>	<p>The approach is considered appropriate to deliver the spatial strategy. Microclimate is identified in the policy as a requirement for consideration.</p>
592	DM76.	John Crompton, Chair, Muswell Hill CAAC	Conservation	<p>Tall buildings –must not have adverse impact on CAs. Para 2.27. There needs to be some clarification that buildings which fall outside of the definition of tall here but are taller than those in the vicinity will not be acceptable through default.</p>	<p>The definition of tall buildings is set out in the Strategic Policies Local Plan. The policy requires consideration of local character. All proposals will also be considered against the DM Policies on the historic environment.</p>
372	DM77.	Highgate Society	Document formatting	<p>Map 2.2 is difficult to read.</p>	<p>Council recognises improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and</p>

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					consistent in the future. Amend map 2.2 to improve image quality.
610	DM78.	Turley on behalf of St. William	Greater flexibility	Whilst it is important to protect the existing built environment from harmful and inappropriate developments, we consider that the Council should retain some flexibility to negotiate the delivery of tall buildings in the borough. Part A of the Policy states that ' <i>tall buildings will only be acceptable in areas identified on Map 2.2 as being suitable for tall buildings</i> '. We recommend the rewording of this policy to replace 'will only be acceptable' to ' <i>are accepted and encouraged</i> ' and that tall buildings outside of these areas should be acceptable if the applicant can provide sufficient justification.	The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy. Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings.
584	DM79.	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Height	We object to Criterion A which states that tall buildings will only be acceptable in areas identified on Map 2.2. As stated in our representations on the Site Allocations SA23 and SA26, we are concerned that in Haringey Heartland, tall buildings are only acceptable along the railway line (where there is limited development opportunity) and Cobourg Road.	The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. The Council considers the approach is appropriate to deliver the spatial strategy.
740	DM80.	Hornsey Historical Society – David Frith	Height	Consider that the definition of a high building as: "substantially taller than their neighbours, have a significant impact of the skyline and are of 11 storeys and over" needs further consideration. it could be read as permitting buildings of 10 storeys regardless of their surroundings. It should be made clear that a building of 10 storeys high would not necessarily be acceptable anywhere in the Borough. Such a building would conflict with policy in DM 2 A(a) which requires development proposals to be appropriate to their locality having regard to, inter alia, building heights.	The definition of tall buildings is set out in the Strategic Policies Local Plan.
616	DM81.	CgMs on behalf of Parkstock Ltd	Height (support)	We are supportive of the building height ranges proposed for Finsbury Park Bowling Alley and note that the above ranges are reflective of the heights proposed within the Site Allocations Development Plan Document Preferred Options Consultation Document. However, para. 2.29 notes that that only places suitable for tall buildings in the Borough are Haringey Heartlands / Wood Green and Tottenham Hale. This statement is therefore at odds with Map 2.2 (and the Site Allocations Development Plan Document Preferred Options Consultation Document) and should be amended to accurately reflect Map 2.2.	Support is noted. The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy. Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings, informed by additional new evidence on tall buildings.
634	DM82.	Alan Stanton, local resident	Height/ character of the area	The entire thrust of these plans is to create a forest of tower blocks which will impact on our local physical environment; our park; and on local families who need proper affordable homes. Little account is taken of these matters in these proposals which give a green light to developers to build over 15 stories and with high densities. I oppose this approach since it will change the character of the area, pays no regard to the quality of life of existing residents and has	The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. The policy will be revised to set out further design requirements having regard to the clustering of tall buildings.

				very scant provision for social housing.	Action: Amend policy to include additional criteria on clustering of buildings.
632	DM83.	The Friends of Down Lane Park	Impact of tall buildings on the PArk	<p>The park is threatened with being encircled by high tower blocks and new buildings installed as part of the Harris Federation school. If realised the proposals would result in building blocks on the north edge of the park along the recycle centre and council depot. Then there will tall buildings on the Ashley Road sites that will tower over the tennis courts to children's playground area. In addition, the south edge of the park will face on to tower blocks on Hale Road and the Welbourne site. This enclosure of tower blocks will be overbearing on a community park, as well as the terraced housing on Park View Road. It is a park for people, not a patch of green between tall buildings.</p> <p>A community park should not become a grassed area between tower blocks. Parks are there to replicate being in the countryside and provide an outlet for the human desire to be detach at times from the bustle of the urban world. They are great places because they are not surrounded by a screen of concrete and glass slabs. A bank of tall towers will cast long shadows over the park. It is important to remember that psychologically parks play a vital function in our lives. They provide tranquility and enable us to get away from stressful living because they are secluded or have secluded sections.</p>	The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. Any future planning application for tall and taller buildings will need to demonstrate compliance with this policy, along with other DM Policies, including DM1 and DM2 and policies regarding open space.
372	DM84.	Highgate Society	Locations suitable for tall buildings	Map 2.2 appears to show two orange smudges in Highgate. The heights which these refer are illegible but these look to be referring to the area to the west of North Road and the Alymer Road shopping area. As these adjoin listed buildings, are in conservation areas, or overlook historic parks, the Society believes this proposed designation to be inappropriate and potentially damaging, and that these two areas should be omitted from the map.	Noted. There are two areas of mid-high rise height recommendations in the UCS. It is not considered that these are tall buildings as defined by the Local Plan. The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. All proposals will also be considered against the DM Policies on the historic environment.
629	DM85.	DP9 on behalf of undisclosed	Map 2.2	Map 2.2 should be made more vague to provide flexibility to enable the exact location of taller buildings to be defined through site analysis and careful design.	<p>The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy.</p> <p>Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings.</p>
616	DM86.	CgMs on behalf of Parkstock Ltd	Mapping quality	<p>As a general point, we would suggest that Map 2.2 is provided at a better quality to ensure the key and precise location of tall buildings is clear and accurate.</p> <p>In relation to Finsbury Park Bowling Alley (site SA 40 in the Site Allocations Development Plan Document Preferred Options Consultation Document), we note that this is shown partially red (approximately 11 plus storeys) and partially orange (approximately</p>	<p>Council recognises improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future.</p> <p>Action: Amend map 2.2 to improve image quality</p>

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				6 to 11 storeys). Although this is quite blurry on Map 2.2 we have confirmed this with the policy officers.	
694	DM87.	Iceniprojects on behalf of Berkeley Homes	NPPF consistency	<p>The Policy is unsound as it is not consistent with national or regional policy.</p> <p>This Policy should not put a ceiling on the appropriate height of buildings in the borough nor should it be setting out a 'blanket approach' towards heights. The Council's evidence base is noted and is a helpful baseline consideration for understanding the nature of building heights across the borough. However, proposals for tall buildings should be considered on their individual merits and emerging context and the Council should not rely on an arbitrary figure.</p> <p>The policy should be amended so that building heights are not applied rigidly to each site within each area.</p> <p>Again, the borough has an ambitious strategic housing target, which it rightly aims to meet and exceed. Applying onerous policies such as this, will inevitably hinder the Council's delivery of housing.</p>	<p>The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy.</p> <p>Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings.</p>
373	DM88.	Highgate CAAC	Object to location suitable for tall buildings	<p>The Wellington site is not suitable for anything over three storeys taking into account the context, the views up the wooded slope of Highgate Hill and across to Highgate Woods.</p>	<p>The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. Any future planning application for tall and taller buildings will need to demonstrate compliance with this policy, along with other DM Policies, including DM1 and DM2 and policies regarding open space and identified locally significant views.</p>
373	DM89.	Highgate CAAC	Object to location suitable for tall buildings	<p>The North Hill site is unclear; is Highpoint intended. If this is so this is a grade 1 listed building and no alterations can be contemplated.</p>	<p>The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. Any future planning application for tall and taller buildings will need to demonstrate compliance with this policy, along with other DM Policies, including DM1 and DM2 and policies regarding the historic environment.</p>
373	DM90.	Highgate CAAC	Object to locations suitable for tall buildings	<p>It seems that 2 locations in Highgate are deemed suitable for tall buildings. These seem to be a location at the Wellington roundabout and another on North Hill. It is our considered opinion that NO site in Highgate is suitable for tall buildings.</p>	<p>The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character.</p>
630	DM91.	Lilian Kaluma, local resident	Object to tall buildings	<p>The general understanding from local residents is that we strongly object to the draft Local Plan and the Tottenham Area Action plan proposals for the development of tower blocks in our local community, and especially around and adjacent to Down Lane Park. This is a vital local amenity and surrounding it with extremely tall buildings will destroy this. The proposals for tower blocks will cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local</p>	<p>The DM Policies do not propose tower blocks but set requirements to manage the development of tall and taller buildings. The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy.</p>

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				facilities.	
631	DM92.	Martin Ball, local resident	Object to tall buildings	I object strongly to the draft Haringey Local Plan and the Tottenham Area Action plan proposals for the development of tower block in the Tottenham Hale community, and especially around and adjacent to Down Lane Park. This is a vital local amenity and surrounding it with extremely tall buildings will destroy this.	The DM Policies do not propose tower blocks, but set requirements to manage the development of tall and taller buildings. The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy.
626	DM93.	Helen Steel, local resident	Objection	<p>I object to the proposals for tall buildings (up to 25 storeys high) in Wood Green, Turnpike Lane area and Tottenham. All the proposals will have a dramatic impact on neighbouring streets, blocking direct sunlight and views of the skyline and contributing to an increased sense of enclosure which is detrimental to mental well-being.</p> <p>High density housing leads to a more stressed environment for everyone, especially families where children are frequently under the feet of their parents. There is an increased risk of social problems and the Council does not appear to be learning lessons of past high density development. The Council should be planning to develop social housing with gardens to house people who are on the waiting list, rather than encouraging developers to build huge blocks which will be unaffordable to the majority of local people in need but which will blight our neighbourhoods.</p> <p>Tall buildings create a wind tunnel effect around them and this could lead to serious dangers to cyclists, especially at busy road junctions such as Turnpike Lane, if they or vehicles around them are buffeted by high winds and blown into the path of cars. On several occasions while cycling past Kenley tower block on Broadwater Farm Estate I have been blown off course or forced to a stop by the strength of the wind there. Fortunately Adams Road is fairly quiet, however Turnpike Lane is a very busy junction so risks will be much greater. (See for example this report regarding a Leeds tower block http://www.bbc.co.uk/news/uk-england-leeds-16986600)</p> <p>I regularly visit the Turnpike Lane / Wood Green area and in relation to the proposals there, the pavements on Wood Green High Road are already frequently extremely busy, the impact of such a huge increase in residential units in the area will lead to more overcrowding and increased stress levels for people trying to get home or to the shops.</p> <p>The proposals for buildings up to 25 storeys high should be withdrawn from the DPD.</p>	The policy is informed by an analysis of urban form as set out in baseline evidence, including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy. All proposals for tall and taller buildings will need to be of a scale consistent with the site's surroundings and have regard to local character. The policy includes considerations for site microclimate.
566	DM94.	Capita on behalf of Capital & Regional plc, partial landowner	Policy conflict	The policy does identify an inconsistency with the approach adopted in respect of Policy SA16 in the emerging Site Allocations document, which prescribes specific locations and maximum building heights. If DM5 is to be effective, the suitability of a tall building must be considered against the criteria set out in part B of DM5. The location and height of a proposed building would then be	The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed

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				<p>arrived at by way of detailed design considerations.</p> <p>The current approach set out in Policy SA16 appears to have been arrived at in isolation and effectively presupposes the outcome of criteria based assessment. There is an internal conflict between DM5 and the Site Specific Allocations document.</p>	<p>from the policy.</p> <p>Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings.</p>
566	DM95.	Capita on behalf of Capital & Regional plc, partial landowner	Quality of Map	<p>Map 2.2, which accompanies the policy, identifies the broad locations where taller buildings may be acceptable, subject to the criteria set out in part B of the policy. However, the scale and quality of the map render it almost impossible to read.</p>	<p>Council recognises improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future.</p> <p>Action: Amend map 2.2 to improve image quality</p>
631	DM96.	Martin Ball, local resident	Social impact of tall buildings	<p>The proposals for tower blocks will cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. It breaches a whole range of planning policies which should protect our community</p>	<p>The DM Policies do not propose tower blocks, but set requirements to manage the development of tall and taller buildings. The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. The approach is considered appropriate to deliver the spatial strategy.</p>
572	DM97.	Beatrice Murray, resident	Suitable location	<p>There is always a danger that very tall residential buildings (10–15+ storeys) can result in social problems and feelings of detachment from local society. They are only really appropriate in a central city setting of a type where they are the norm, not in predominantly residential areas (including ones with shopping centres).</p>	<p>Concern is noted. The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. The Local Plan policies broadly seek to ensure that new development positively contributes to the local area including by promoting accessible and inclusive environments.</p>
572	DM98.	Beatrice Murray, resident	Supports tall buildings	<p>If there are to be such buildings, believes the three sites along Wood Green High Rd are the most suitable for taller buildings.</p>	<p>The Council welcomes support of this policy.</p>
373	DM99.	Highgate CAAC	Tall buildings	<p>The idea of landmark buildings is not acceptable.</p>	<p>Noted. The Council considers that landmark buildings can positively contribute to placemaking, provided they meet the requirements set out in the Local Plan.</p>
414	DM100.	GLA	Tall Buildings	<p>It suggested that part B of Policy DM5 includes a more comprehensive list of criteria for assessing tall building proposal that accords with London Plan Policy 7.7 C.</p>	<p>Noted.</p> <p>Action: Amend policy to set more detailed requirements for assessing tall buildings, consistent with the London Plan.</p>
415	DM101.	Transport for London	Tall Buildings	<p>The identified locations for tall buildings around future Crossrail 2 stations is welcomed.</p>	<p>Council welcomes support for this policy.</p>
421	DM102.	Historic England	Tall Buildings	<p>It is noted that the definition for tall buildings in the Borough is identified as anything above 11 storeys in height. We are assuming that the UCS has been used to inform the suggested height threshold for the definition. However we would suggest that the height should be expressed in metres AOD (e.g. 39 metres as detailed in the UCS). In addition it is not clear why this figure was decided to be the benchmark for tall buildings as the definition in the London Plan states that 'tall buildings are those that are substantially taller than their surroundings'. As detailed in the UCS the vast majority of buildings are up to 6 storeys (21 metres) with buildings above this height beginning to have a visual impact. Which suggests the threshold proposed is possibly too great. It</p>	<p>Noted. The UCS has used storeys, and Map 2.2 differentiates between "mid-high" rise buildings (8-11 storeys), and 11+ storey potential locations. The UCS itself offers more detail on where 1-3 and 3-6 storey developments are recommended to go.</p> <p>The definition of a tall building is set out in the Strategic Policies Local Plan, which is in conformity with the London Plan definition. To allow for a more flexible approach on individual proposals, having regard to local character, specific height requirements will be removed from the policy.</p> <p>Action: Remove height requirements and amend policy to set</p>

				would therefore be useful is to get further clarification on the figure decided as a trigger for this policy. If the threshold is proposed to be reduced then Map 2.2 that informs policy DM5 would need to be reviewed.	additional design criteria on tall and taller buildings.
421	DM103.	Historic England	Tall Buildings	Part A of the policy refers to Map 2.2 in which to identify appropriate locations for tall buildings. However the quality of the Map in the DPD and available on the Council's web is of very poor quality to the extent it is not possible to neither identify the extent of the designation nor read the key. This lack of clarity is contrary to NPPF paragraph 154. Further consultation on this issue should be undertaken supported by clear readable maps. Amend part B point b) to the following to reflect NPPF paragraph 154 and to aid in the operation of paragraph 128: <i>Responds to the local and historic environment including significance of heritage assets</i>	Council recognises improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future. The policy provides that building heights will need to be of a scale consistent with the site's surroundings. The policy will need to be considered in conjunction with DM policies on the historic environment and. Action: Amend map 2.2 to improve image quality. Include addition criterion for buildings to have regard to historic environment.
421	DM104.	Historic England	Tall Buildings	We would also raise concerns with the use of 'landmark' as a possible justification for tall buildings – point d. We would suggest, reflecting NPPF paragraph 152 and its reference to avoiding adverse impacts to the dimensions of sustainable development, that the policy highlights the need to seek alternative options which can eliminate adverse impacts.	Noted. The Council considers that landmark buildings can positively contribute to placemaking, provided they meet the requirements set out in the Local Plan.
584	DM105.	Rapleys on behalf of Lasalle Investment Management , long leaseholders	UCS	It is noted that Haringey's Urban Character Study (2015) ('UCS') identifies that there is an opportunity to substantially increase the general building height in Haringey Heartland, as part of intensification and regeneration plans. However, it recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the eastern area of the railway line when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. The USC's recommendation, which is reflected in Map 2.2, will significantly constrain the redevelopment opportunity of the area, particularly the strategic objective to intensify and to increase the development capacity for growth.	The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy. Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings, informed by additional evidence on tall buildings.
610	DM106.	Turley on behalf of St. William	Wood Green	Wood Green is identified as the largest and busiest town centre in the Borough and is designated as one of the twelve Metropolitan Centres across London. The area has been identified in Haringey's Site Allocations Development Plan Document (DPD) and the supporting text of the Policy as being a suitable location for taller buildings. Furthermore, Haringey's Urban Character Study (2015) notes that Wood Green is an area that currently comprises mid to high rise buildings and can further accommodate tall buildings. This however, is not fully reflected in Map 2.2 as a suitable location for tall buildings. On this basis, we consider that Map 2.2 should be updated to identify the northern and western parts of Clendon Square as being suitable for tall buildings. The housing target for Haringey, in particular the Haringey Heartlands/Wood Green intensification area has increased within the Local Plan and The London Plan and currently has an indicative figure to provide 3,000 new homes (as stated in the Site	The Council considers that tall buildings will only be appropriate in certain locations, consistent with the London Plan approach. The Local Plan identifies locations where tall buildings may be suitable, as informed by baseline evidence including the Urban Characterisation Study. To allow for a more flexible approach on individual proposals, specific height requirements will be removed from the policy. Action: Remove height requirements and amend policy to set additional design criteria on tall and taller buildings, informed by additional evidence on tall buildings.

				Allocations DPD). With a finite source of land in Haringey and a rising housing target, we consider that a more flexible approach should be adopted in the Council's approach to tall buildings as this can significantly support the delivery of housing and aid in the regeneration and economic goals for both Haringey and London in accordance with the targets set out within the London Plan.	
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Comments on DM6 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
372	DM107.	Highgate Society	Document formatting	Map 2.3 is of poor quality and therefore not comprehensible.	Council recognises improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future. Action: Amend map 2.2 to improve image quality.
372	DM108.	Highgate Society	Views and vistas	On Map 2.3, there appear to be few views indicated to or from Highgate, even though it is the highest point of the Borough. A number of important views have been identified in the Highgate Conservation Area Appraisal and these should be indicated in the map 2.3. In summary these include: the view from the top of Southwood Avenue looking east; the view from Townsend Yard looking east over the Bowl area; the view from Highgate High Street looking towards the city; the view from Southwood Lane looking over Kingsley Place south and the view from Archway Road into the city; The view from Cromwell Avenue towards Alexandra Palace.	Noted.
372	DM109.	Highgate Society	View and vistas	There are a number of historic views into Highgate which need to be taken into consideration, including views from Hampstead Heath towards St Michael's Church and towards St Joseph's Church and general views from Alexandra Palace towards Highgate. In addition, there is an important, if narrow, view from near the top of North Hill towards the Barnet/Totteridge Ridge.	Noted.
373	DM110.	Highgate CAAC	Views and vistas, local evidence	Views are included in the Conservation Area management Plan, which should be consulted.	Noted. Views in CAMP will be signposted in the supporting text. Action: Signpost CAMP views in supporting text.
373	DM111.	Highgate CAAC	Views and vistas	Since Highgate is the highest point in the borough it is clearly an important 'viewpoint'.	Noted.
373	DM112.	Highgate CAAC	Views and vistas	Suggest that the view of the Highgate Ridge from Alexandra palace, the view down the High Street to the City, the view from Kingsley Place over east London are noteworthy.	Noted.
373	DM113.	Highgate CAAC	Views and vistas	The map is inadequate but appears there are no views out from or into Highgate included on it.	Council recognises improvements could be made to our map and image resolutions, and we will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future. Action: Amend map 2.2 to improve image quality.
414	DM114.	GLA	Correction	The reference to the 'Further Alterations adopted November 2014' in paragraph 2.31 should be corrected to London Plan 2015	Noted. The London Plan will be appropriately referenced in the next published version of the Plan. Amend para 2.31 as suggested

421	DM115.	Historic England	Views	<p>We welcome the inclusion of a policy that considers the management of key views within and across the Borough. However the wording of the policy does not sit comfortably with the details provided in the UCS. For example the UCS refers to three types of views which we can only assume are being collectively called 'Locally important views'. However when considering the supporting text to the policy reference is made to the Mayor's strategic views as well as the UCS views. We would therefore suggest that the policy decides which views it seeks to manage. The policy wording especially the 2nd sentence should be strengthened and clarified. For example what is meant by 'disturbance to the locally significance views should be minimised...'? How will the views be managed, what evidence has been captured that provides a benchmark in which to measure the qualities of the view and how they will be managed against proposals for change? We are happy to work with the Council on developing this policy further.</p>	<p>The Council welcomes support for this policy. For each identified view, the UCS sets a view typology (panoramic, linear, or townscape) which is then classified either as strategic or locally significant view. The policy only refers and seeks to manage locally significant views. The supporting text includes information on London Plan strategic views to provide context. The Council acknowledges that the supporting text could be amended to provide clarity.</p> <p>Action: Amend policy to set clearer criteria / supporting text for considering impacts on views.</p>
592	DM116.	John Crompton, Chair, Muswell Hill CAAC	New local view proposed	<p>Local views – welcome – see App A Page 99 – Add: Dukes Avenue ----→ Alexandra Palace.</p>	<p>Council welcomes support for this policy.</p>
615	DM117.	Colin Marr on behalf of the Alexandra Park And Palace Conservation Area Advisory Committee	Additional local views	<p>In addition to the ten linear views of AP that are listed in the draft, the CAAC proposes the following additions:</p> <ul style="list-style-type: none"> • Ferme Park Road ---→ AP • Dukes Avenue ---→ AP • The Avenue (N10) ---→ AP • Muswell Hill Road -→ AP 	<p>Noted.</p>
615	DM118.	Colin Marr on behalf of the Alexandra Park And Palace Conservation Area Advisory Committee	Additional wording	<p>The APPCAAC would like to see this important strand of agreed Strategic Policy included in DM6. We recommend that Paragraph 6.2.19 (below) be included in full. This should become a new paragraph to be inserted after 2.33 on page 13.</p> <p><i>The Council will seek to protect locally important views that contribute to the interest and character of the borough. These may include:</i></p> <ul style="list-style-type: none"> • <i>Views of and from large parks and open spaces, such as Alexandra Palace and Finsbury Park and other public parks on the Local Register of Historic Parks and Gardens;</i> • <i>Views into, within and from Conservation Areas; and</i> • <i>Views of listed and landmark buildings and monuments.</i> 	<p>Noted.</p>

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Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
592	DM119.	John Crompton, Chair, Muswell Hill CAAC	Conservation	Suggest deleting the reference to Listed Buildings –shopfronts in CAs can have important characteristic which make a positive contribution to the CA. Suggest also having something about taking the opportunity to carry out more general repairs to the front of the property –particularly to ensure its safety to passers- by.	Agreed. The council has removed reference to listed buildings. The supporting text will be amended to reflect that development should have regard to significance of a heritage asset and its setting, in line with DM Policies on historic environment. Action: Amend paragraph 2.37 to delete reference to listed buildings and revise supporting text to align with DM Policies on historic environment.
431	DM120.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Corporate signage	Finally in this paragraph, why should the council ask for ‘corporate’ signage to be changed, unless this is required in the interests of amenity? If this is what the council consider necessary, the text should make it clear. But, in all, we consider paragraph 2.44 is so excessive and unenforceable that it should be entirely deleted.	Agree. Action: Revise supporting text to be less prescriptive, ensuring sufficient flexibility for consideration on a case by case basis.
431	DM121.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Deletion	This paragraph is meaningless and only repeats 2.42. It should be deleted.	Disagree. This is text which provides further information to the policy objectives.
268	DM122.	Colin Kerr and Simon Fedida	Design	The policy states that ‘the imitation of historical styles is never appropriate and should not be attempted’. This sounds like a fatwa. The opposite proposition concerning the success of crude ‘contemporary’ design has many counter examples, unfortunately. Designs should be assessed on their merits. The proposed stricture is unnecessary. Recommendation: The ban on the imitation of historical styles should be struck out. The first sentence of para 2.38 should be deleted.	Agreed. Action: Delete text as suggested.
431	DM123.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Illuminated fascias	Third bullet point. There is no justification for the proposed ban on internally illuminated “box” fascia signs. Modern “box” fascia signs are now commonly slimline (little more than 100mm deep); they may be recessed into the fascia; and they are often designed so that only the lettering illuminates on an otherwise unlit backing panel. Similarly, “halo” illumination (which still requires a “box” sign of sorts) is often commonly acceptable even in the most sensitive areas. We would suggest that this bullet point ought to be amenity based and suggest “Bulky, fully internally illuminated box fascia signs are unlikely to be acceptable”	Agree. Action: Revise supporting text to be less prescriptive, ensuring sufficient flexibility for consideration on a case by case basis.
431	DM124.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	National policy	Paragraph 4 of the PPG ‘Advertisements’ makes clear that should local policies be considered necessary for the control of advertisements they should be evidence based.	The Council considers that the policy is sound and supported by technical evidence.
431	DM125.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Opposition to supporting text	DM7 F is totally appropriate and adequate for the control of advertisement display on shopfronts. We support this policy. However, the supporting text goes far beyond the considerations in the policy and are excessively and disproportionately prescriptive. It is most certainly not ‘evidence based’. It is full of prejudices and assumptions.	Council welcomes support for this policy. Action: Revise supporting text to be less prescriptive, ensuring sufficient flexibility for consideration on a case by case basis.
431	DM126.	Chris Thomas Ltd on behalf of	Previous consultation	Commented on first draft and disappointed comments have not been heeded and the draft DPD still exceeds by far the criteria permitted in the TCP (Control of Advertisements)(England) Regulations 2007 and	Disagree. The Council considers that the policy is within the scope of powers that may be exercised by the local planning authority in the interests of amenity and public safety.

		British Sign and Graphics Association		the advice in National Planning Policy and Practice Guidance.	
562	DM127.	Cllr John Bevan	Shop shutters	Solid shutters used both external and internal on shop fronts and indeed any other buildings should not be permitted. All shutters should be internal and of a trellised like design for internal use . A preference should be stated for internal use and if practical external shutters of any kind should not be permitted	Noted. The policy provides that solid external security shutters should be avoided. Where it can exercise control, the planning authority will seek to manage the design and use of shutters in line with the policy requirements.
421	DM128.	Historic England	Shopfronts	In general we are supportive of this policy. However we would suggest that when advising on the heritage interest of shopfronts, that the significance of the interest is considered in line with the NPPF paragraph 128.	Council welcomes the support. The policy will be considered alongside DM Policies on the historic environment and reflect consideration for the significance of heritage assets and setting. Further information will be set out in supporting text. Action: Amend supporting text to signpost consideration for the significance of heritage assets and their setting.
431	DM129.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Sign design	Second bullet point. Sign written lettering is now so rare and expensive that it is not practical choice. There are not enough signwriters left in the UK to fulfil this policy in Haringey alone, yet alone all the rest of the UK. The sentence "individual cut letters, stating the name and trade of the premises and the shop number" is wholly beyond the powers of the Council. Why should letters be individually cut? There are all sorts of designs for lettering which will be acceptable. Any attempt to dictate the content of a sign is beyond the Council's legal power – see regulation 3(4) of the 2007 regulations. We would suggest this bullet point be reduced to simply "Lettering/logos should be in proportion to the size of the fascia and the shopfront as a whole".	Agree. Action: Revise supporting text to be less prescriptive, ensuring sufficient flexibility for consideration on a case by case basis.
431	DM130.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Sign design	First two sentences. This is ridiculous. In general, the determining factor as to what form of fascia sign is appropriate will be the design of the shopfront and the building as a whole. For example, a timber panel would look wholly out of place above a modern, fully glazed, aluminium-framed shopfront. We suggest that these two sentences be deleted and replaced with "greater care is required where the premises are a Listed building or in a Conservation Area".	Agree. Action: Revise supporting text to be less prescriptive, ensuring sufficient flexibility for consideration on a case by case basis. Revise supporting text to align with DM Policies on historic environment.
431	DM131.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Sign design	Why should materials and colours be "of a limited range"? And what does this mean? Do you really expect a busy, thriving shopping area to be limited in the range of colours and materials? Acrylic-type materials (mosaic is so rare as to not be worth mentioning) are commonly used in shopfront signage throughout the UK. They are hard-wearing, requiring little maintenance and versatile. Why should they be unacceptable in Haringey? Can the Council point to a single example of "unfinished" metal? For its own protection, metal is invariably "finished", either by painting, powder-coating or some other method. Why should "bright" colours be avoided? It would be a dull shopping centre indeed without bright colours. As to window stickers and posters within shop windows, these forms of advertisement are excepted from the Council's control or have deemed consent under Class 1 in Schedule1 or Class 12 in Schedule 3 to the regulations. They are effectively beyond the council's control.	Agree. Action: Revise supporting text to be less prescriptive, ensuring sufficient flexibility for consideration on a case by case basis.
431	DM132.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Sign requirements	Fourth bullet point. [See third bullet point comments for content of the sign]. The words "describing the name or trade of the shop" should be deleted. We would also suggest that the exceptions could also include single very large (Department-type) stores in a single building where the length of the frontage could accommodate more than one projecting sign without harm to amenity.	Agree. Action: Revise supporting text to be less prescriptive, ensuring sufficient flexibility for consideration on a case by case basis.

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592	DM133.	John Crompton, Chair, Muswell Hill CAAC	Suggested additions	Two things need to be added: fascias cannot be used to advertise products sold in the store and the use of gimmicky graphics e.g. of an apple is to be avoided/not allowed?	The policy will ensure signage is of the highest possible standards and contributes to a safe and attractive environment. This policy is intended to be applied on a case by case basis.
592	DM134.	John Crompton, Chair, Muswell Hill CAAC	Support with clarification	Is it "of" rather than "or" in B. E –the CAAC strongly supports the statement about solid shutters not being acceptable.	Council welcomes the support for E and has amended B accordingly. Action: Amend policy text as suggested.

Comments on DM8 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
415	DM135.	Transport for London	Advertisements	Welcome the reference in paragraph 2.55 – although the text should be corrected to "Transport for London Road Network". TfL has a set criteria of requirements that it imposes on advertisement boards on the Transport for London Road Network (TLRN), particularly illuminated/electronic signs. This requires a number of conditions to be imposed in order to mitigate any impact on safety/driver distraction, details of these can be provided if required.	Council welcomes the support and has amended the policy accordingly. Amend supporting text to state: Any proposals for advertisements in or adjacent to the Transport for London Road Network will require a view from Transport for London with reference to the impact of the advert on the safe operation of the highway network.
431	DM136.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Correction	How many times must we tell you that the correct title is the Town and Country Planning (Control of Advertisements)(England) Regulations 2007?	Noted. Paragraph 2.54 will be updated accordingly. Action: Amend supporting text to refer: The Town and Country Planning (Control of Advertisements) (England) Regulations 2007
431	DM137.	Chris Thomas Ltd on behalf of British Sign and Graphics Association	Council policy	We consider that the Council's overall approach to advertisement control is entirely negative. Advertisements are an integral part of the urban environment, just as much as buildings, trees and traffic. The only policy which is really required is that well-designed and sited advertisements enhance the urban environment and are to be welcomed.	The Council acknowledges that advertisements form part of the public realm and has therefore included policies to ensure that they positively contribute to local areas. The suggested policy wording is not considered to provide a sufficient basis to appropriately manage this type of development, particularly in having regard to local circumstances.
562	DM138.	Cllr John Bevan	Telephone kiosks	Advertisements on any telephone kiosks should not be permitted, as is already applied at Westminster Council	The draft policy is considered to provide a sufficient basis to ensure advertisements do not adversely impact on local character.

Comments on DM9 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
420	DM139.	Mobile Operators Association	Telecommunications	We would consider it appropriate to introduce the policy and we would suggest the following: "Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to	The Council considers that the suggested principles for siting and design of mobile communications are reflected in the proposed policy. However it is agreed that the Local Plan could set a more positive framework for supporting telecommunications and policy wording has been revised to this effect.

				facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.”	Action: Amend policy to reflect role of mobile communications in supporting business and the economy.
420	DM140.	Mobile Operators Association	Telecommunications	<p>While we support the inclusion of Policy DM 9 Telecommunications within the emerging Development Management Policies (DPD), we have the following concerns about the wording of the policy:</p> <p>Criterion A(c) of Policy DM9 states that telecommunications equipment will be permitted where it can be demonstrated that;</p> <p><i>‘The size of the any equipment visible from the street should be should be minimised (including satellite dishes, other domestic equipments and any supporting structures);’</i></p> <p>We consider the wording of Criterion A(c) to be ambiguous and potentially overly restrictive in relation to telecommunication development. The operators are committed to ensuring that the amount and dimensions of all newly proposed apparatus be limited to a minimum operational requirement so as to minimise potential impact. We would therefore suggest that this wording is removed from Policy DM9.</p>	<p>Agreed. In order to set clearer expectations for development proposals, the policy will be amended to require that equipment is limited to the minimum operational requirement.</p> <p>Action: Amend policy to state that new proposed apparatus must be limited to minimum operational requirement.</p>
420	DM141.	Mobile Operators Association	Telecommunications	<p>Criterion A(e) of Policy DM9 states that telecommunications equipment will be permitted where it can be demonstrated that;</p> <p><i>‘They are appropriately designed, coloured and landscaped to take account of their setting. For dishes, this may include installing a mesh or transparent structure;’</i></p> <p>We consider the wording of Criterion A(e) to be overly restrictive. The operators are committed to employing means of disguising their apparatus when seeking to address coverage requirements in sensitive locations however due to the siting and design of some telecommunications structures such as a streetworks style pole, it is not always possible to provide landscaping or camouflaging for the installation.</p> <p>We suggest that Criterion A(e) is amended to the following:</p> <p><i>‘the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area’</i></p>	The Council considers that policy requirement is consistent with NPPF paragraph 43.
420	DM142.	Mobile Operators Association	Telecommunications	<p>Criterion A(f) of Policy DM9 states that telecommunications equipment will be permitted where it can be demonstrated that;</p> <p><i>‘There is no significant adverse impact on the visual amenities of neighbouring occupiers.’</i></p> <p>While it is recognised that operators should exercise great care if locating equipment within areas of high visibility or overlooked by housing, paragraph 44 of NPPF states that;</p> <p><i>“Local Planning Authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development.”</i></p> <p>In accordance with NPPF, the Mobile Network Operators aim to keep the environmental impact of all communications infrastructure to a minimum. We would therefore suggest that Criterion A(f) is removed from Policy DM9.</p> <p>If it would be considered useful in creating a concise and flexible telecommunications policy, we would suggest the following wording:</p>	The Council considers that the policy is consistent with the NPPF and provides sufficient flexibility to support telecommunications equipment across the borough.

				<p><i>“Proposals for telecommunications development will be permitted provided that the following criteria are met: -</i></p> <p><i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i></p> <p><i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i></p> <p><i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i></p> <p><i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</i></p> <p><i>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”</i></p>	
592	DM143.	John Crompton, Chair, Muswell Hill CAAC	Suggested additions	Add a new criteria which stipulates that the applicant undertakes to remove equipment when it is no longer in use, including cabinets	<p>Under permitted development rights telecommunications apparatus should be removed from the land as soon as reasonably practicable after it is no longer required for telecommunications purposes. Therefore Council believes it is appropriate that this could be included as a condition for planning permission. The policy has been amended accordingly.</p> <p>Action: Amend policy to require that all telecommunications equipment should be removed from the land, building or structure on which it is situated as soon as reasonably practicable after it is no longer required for electronic communications purposes.</p>

Comments on DM10 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
372	DM144.	Highgate Society	Refuse storage, amenity	Suggest additional requirements for refuse storage in conversions. Too often there is not enough space in the front amenity areas to accommodate the bins now specified by Haringey. When these are provided it is often at the loss of the front garden area or the outlook from ground floor and basement units. In these cases conversion should not be permitted.	The policy requires that all proposals for new development demonstrate adequate arrangements for waste management facilities. The Council does not consider it is necessary to provide further criteria for conversions.
410	DM145.	North London Waste Authority	Waste Management	NLWA supports this policy, particularly because too often designs for development fail to accommodate sufficient space to allow residents to easily separate their water into recyclable and non-recyclable fractions to maximum effect. However, the key challenge is to ensure that the planning policy on waste management provision is implemented. The London Waste and Recycling Board (LWARB) and London Environment	Support for the policy is welcomed. The Council has reviewed the model policy and considers that its key principles are covered by the proposed policy DM10. A separate policy for flatted development is considered unnecessary but the limited criteria relevant only to flatted development could be contained in a part B to Policy DM10. Additions to this effect have therefore been added.

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				Director's Network (LEDNET) have commissioned waste management planning advice for flatted schemes that includes model policy, template waste management strategy for developers for pre-application, and case studies. NLWA recommends that LB Haringey considers incorporating the findings of the advice into its own development management policies as appropriate.	Action: Include additional part B to policy with requirements for flatted development.
410	DM146.	North London Waste Authority	Waste Management	The priority for NLWA as the waste disposal authority is to achieve the goal of recycling 50% of waste from households (and similar wastes). However, the achievement of targets may require flexibility in waste collection arrangements over time. We would therefore recommend that the final version of DM10 needs to recognise the need for sufficient flexibility to enable the waste collection authority to amend collection arrangements over time.	The Council does not consider that the proposed policy would restrict the NLWA from amending its collection arrangements.
417	DM147.	Haringey Waste Management Service	Waste Management	The waste management service / Neighbourhood Action Team support this policy. In our experience of commenting on applications it is too common for designs for development to fail to accommodate sufficient and appropriately accessible space to allow residents to easily separate their waste into recyclable and non-recyclable fractions to maximum effect. The implementation of waste legislation to ensure that local authorities collect recyclable materials separately unless it can be shown that this is not Technically Economically and Environmentally Practicable (TEEP) is assisted by robust policies for ensuring the separation of recyclable material or the collection of mixed recyclable materials separately from residual wastes in developments. However, the key challenge is to ensure that the planning policy on waste management provision is implemented.	The Council welcomes support for this policy.
417	DM148.	Haringey Waste Management Service	Waste Management	In this regard we would want to understand how greater consideration and weight can be given to the sufficiency of waste management and recycling arrangements e.g. such that applications for housing may not be submitted without answering yes to the standard application questions at section 7 (requesting consideration of waste requirements) and providing associated detail. This will improve the quality of designs and avoid problems that can occur once a dwelling is occupied, which can cause ongoing nuisance to residents and operational difficulties, at a cost to the council and/or residents (e.g. through additional management charges for containers to be brought to an appropriate collection point on day of collection). The failure to maximise the separation of recyclables will also increase the costs to the council/council tax payers in terms of disposal costs.	All development proposals must demonstrate how they will meet the relevant policy requirements. Policy DM1 sets out the Council's expectations for delivering high quality design and that proposals engage with the key principles of Haringey's Development Charter.
417	DM149.	Haringey Waste Management Service	Waste Management	The London Waste and Recycling Board (LWARB) and the London Environment Directors' Network (LEDNET) have recently commissioned a consultancy partnership formed by BPP Consulting LLP and SOENECS Ltd (SOENECS & BPP) to develop waste management planning advice for flatted properties. The overall requirement was to prepare a template policy or policies on planning for waste and recycling storage and collection in new build flatted properties, with the ultimate aim of encouraging the design of waste management systems that will help London achieve its recycling targets. The conclusions of this work are available in the project report and include: 1.A template waste management strategy for developers to complete at pre-application stage – with the aim that they have considered how	Support for the policy is welcomed. The Council has reviewed the model policy and considers that its key principles are covered by the proposed policy DM10. A separate policy for flatted development is considered unnecessary but the limited criteria relevant only to flatted development could be contained in a part B to Policy DM10. Additions to this effect have therefore been added. Action: Include additional part B to policy with requirements for flatted development.

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				<p>waste and recycling is managed from within the resident's home to disposal. This will assist developers/applicants ensure appropriate and sufficient arrangements easier.</p> <p>2. A template waste management policy – to be adopted by all London boroughs. This would provide clarity and consistency across the capital.</p> <p>3. Case studies UK and International examples of waste management in high rise buildings</p> <p>These documents were launched at workshops on 3 and 18/03/15 and are freely downloadable from the following link: http://www.lwarb.gov.uk/page/?identity=research-fund</p> <p>The service recommends that Planning refers to the LWARB/LEDNET documents within its own Development Management Policies.</p>	
417	DM150.	Haringey Waste Management Service	Waste Management	<p>Achieving the goal of recycling 50% of waste from households (and similar wastes) as set out in the European Waste Framework Directive and other documents may require changes to Haringey's current waste collection arrangements, which should be borne in mind. Choices about the frequency of collections will have an impact on the storage requirements in homes and business premises. It will therefore be helpful to link the policy to Haringey's waste collection arrangements as prevailing or planned at the time of any future development, rather than locking the DMP into current arrangements.</p>	The Council does not consider that the policy would restrict the waste authority from amending its collection arrangements.

Comments on DM11 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
410	DM151.	North London Waste Authority	Waste Management	NLWA supports the inclusion of this new policy within the DMDPD and welcomes the recognition that the DM policies will not repeat policies that will be contained within the upcoming North London Waste Plan, which will identify sites and areas suitable for waste management facilities as well as include policies on the design and impact of new facilities.	The Council welcomes support for this policy.

Comments on DM12 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
740	DM152.	Hornsey Historical Society – David Frith	Garden walls; conservation	Mention should be made of the desirability of preserving garden walls as far as possible with particular reference to Conservation Areas. This issue should also be dealt with in DM 12.	Noted. The policy is intended to cover the significance of all heritage assets and their setting. The policy will establish key principles for managing the historic environment and it is therefore not necessary to list all types of heritage assets.
268	DM153.	Colin Kerr and Simon Fedida	Heritage	DM12Ba envisages the destruction of heritage assets in pursuit of public benefits, when such benefit is considered to exceed the disbenefit of the loss. This policy is extremely far reaching in its effects. Potentially all the heritage assets of the Borough are under threat without limit. It is not clear how the heritage value of a park, building or listed filter bed is to be compared with a unit of housing. The policy is	<p>Noted. The policy will be amended to ensure it is consistent with the key tests set out in the NPPF.</p> <p>Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.</p>

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				unwise. Some ground rules for objectively and systematically evaluating the benefits and losses are urgently needed if much that is of value is not to be irretrievably lost. The danger is that those hot issues at the top of the political agenda override the more subtle benefits offered by heritage assets. Precisely this has happened many times in the history of planning.	
268	DM154.	Colin Kerr and Simon Fedida	Heritage	Recommendation: This policy should only be adopted if accompanied by a framework that enables disparate benefits and losses to be adequately and objectively compared. Without such a framework a wholesale destruction of the heritage fabric of the Borough may result.	Noted. The policy will be amended to ensure it is consistent with the key tests set out in the NPPF. Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.
421	DM155.	Historic England	Heritage	Part A of the policy should be re-worded so that it is more aligned with the NPPF paragraph 131, and the need for local authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation. The current wording touches on some of these elements but not fully.	Noted. The policy will be amended to ensure it is consistent with the NPPF. Action: Amend policy to ensure consistency with the NPPF.
421	DM156.	Historic England	Heritage	Part B of the policy also need to be carefully reviewed so that it does not undermine the policy framework provided by NPPF paragraph 132. Principally the principle that great weight should be given to the assets conservation, and the more important the assets the greater the weight. This point is not reflected in the current wording. In addition reference needs to be made to the setting of assets in the context of harm to or loss of significance through alterations of demolition. The current wording does not make this connection. Finally the reasons for justification for harm to or loss of significance to be supported should be further realigned with the NPPF. For example the different tests used in relation to the grade of heritage assets are not expressed sufficiently in the policy, to the extent that it could undermine operation of this aspect of national policy.	Noted. The policy will be amended to ensure it is consistent the NPPF. Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.
421	DM157.	Historic England	Heritage	In addition the potential public benefits that may support the justification for substantial harm or loss, as expressed by the NPPF are not fully captured in the policy wording. It is accepted that reference is made to the relevant NPPF paragraphs in the supporting text of the policy, but there are concerns that the wording it the policy deviate from the tests in the NPPF.	Noted. The policy will be amended to ensure it is consistent the NPPF. Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.
421	DM158.	Historic England	Heritage	Part D – we would suggest that the modern contemporary designs are sympathetic to the significance of heritage assets, not just the appearance.	Noted.
421	DM159.	Historic England	Heritage	Part E – we would suggest that at the start of this section reference to the significance of heritage assets should be included.	Agreed. The policy will be amended to ensure it is consistent the NPPF. Action: Amend policy to ensure consistency with NPPF, including reference to the significance of heritage assets and their setting.
373	DM160.	Highgate CAAC	Historic environment	Support much of the rest of DM12 and the explanations given in 2.74-2.94.	Support for policy is welcomed.
373	DM161.	Highgate CAAC	Historic environment – adaptive re-use	The idea that the issue of options for adaptive reuse being unachievable can be a matter of merely producing documents during the validation process is far too vague and ill-defined. It is an invitation to would-be demolishers of heritage assets to produce such evidence with no element of consultation or control.	Noted. The policy will be amended to ensure it is consistent with the NPPF in terms of proposals for enabling development. Action: Amend policy to ensure consistency with NPPF on the matter of enabling development.

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373	DM162.	Highgate CAAC	Historic environment – subdivision, infill and backland development	It is hard to see how the ‘subdivision of plots, infill and backland development’ can ever preserve or enhance the significance etc. of a heritage asset. The curtilage of a listed building is as protected as the building itself and the preservation of the setting of heritage assets has been a major concern in recent decisions in the courts.	Agreed. The policy will be amended to ensure it is better highlights the significance of heritage assets and their setting. Action: Amend policy to ensure consistency with NPPF, including reference to the significance of heritage assets and their setting. Update supporting text to provide further detail on this matter.
372	DM163.	Highgate Society	Historic environment, NPPF consistency	Society is concerned by the statement that heritage assets can be developed if “The loss is essential to deliver significant heritage benefit ...or public benefit such as affordable housing opportunities, which outweigh the significant loss”. Whilst the Society welcomes the provision of affordable housing, This contains wording which we feel is in contravention of the relevant clauses of the NPPF and which will lead to harm to heritage assets. It is not within the NPPF to suggest that affordable housing opportunities are of such significant public benefit that they can outweigh the loss of a heritage asset. Indeed, the policy, as worded, clearly suggests that any and all heritage assets may be demolished if the objective is to provide affordable housing. Certainly it could be interpreted thus by a developer.	Noted. The policy will be amended to ensure it is consistent with the key tests set out in the NPPF. Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.
372	DM164.	Highgate Society	Historic environment, NPPF consistency	The policy, as worded, is both damaging and contrary to national policy for the protection of the heritage. This cannot be its intention. This clause must therefore be amended, and strengthened, with the word “substantially” inserted before the word “public benefit” and the words “such as affordable housing opportunity” removed	Noted. The policy will be amended to ensure it is consistent with the key tests set out in the NPPF. Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.
372	DM165.	Highgate Society	Historic environment, NPPF consistency	Glad that Haringey is extending this test to ‘heritage assets’ in the broader sense (which may include locally listed buildings or those which positively contribute to CAs) but the strong presumption against harm/loss of designated assets, eg. listed buildings and conservation areas, needs emphasis here. The plan would benefit here from quoting para 132 of the NPPF.	Noted. The policy will be amended to ensure it is consistent with the NPPF. Action: Amend policy to ensure consistency with the NPPF.
372	DM166.	Highgate Society	Historic environment, NPPF consistency	The development on backlands section should be strengthened. Suggests following wording be inserted. <i>“In addition to above, applications for new development or alteration works affecting a heritage asset or its setting, including subdivision of plots, infill and backland development, would only be granted where they preserve or enhance the character, appearance and setting of the asset if it is within a Conservation Area.”</i>	Noted. The policy is intended to cover the significance of all heritage assets and their setting. The policy will be clarified to make this clear, along with revised supporting text. A new policy on backland, infill and garden land development will also be prepared to provide further considerations in this respect. Action: Amend policy and supporting text to make clear the policy covers heritage assets and their setting. Addition of new policy on backland, infill and garden land development.
373	DM167.	Highgate CAAC	Historic environment, NPPF consistency	Paragraph B(a) page 22 contains wording which is in contravention of the relevant clauses of the NPPF and which will lead to harm to heritage assets. It is not within the NPPF to suggest that affordable housing opportunities are of such significant public benefit that they can outweigh loss of a heritage asset.	Noted. The policy will be amended to ensure it is consistent with the key tests set out in the NPPF. Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.
659	DM168.	Haringey Federation of Residents Associations (HFRA)	Our Tottenham Charter	PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE: - Protect Tottenham’s listed buildings, conservation areas and general positive architectural characteristics, and ensure any new development is of good quality - All planning policies must: safeguard and value heritage buildings, including those outside Conservation Areas; ensure that heritage-led regeneration benefits Tottenham residents in the short, medium and long term, and doesn’t lead to the kind of gentrification	Noted.

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				which forces people out of Tottenham. We also need to identify and improve quality of design, amenity and sustainability standards for all new development.	
628	DM169.	DP9 on behalf of Tottenham Hotspur Football Club	Proliferation of benefits	Requested that the policy be amended to highlight that affordable housing is only one public benefit that may be taken into account, with other uses also able to be weighed up.	Noted. The policy will be updated so that potential public benefits are not listed, with reference to the relevant key tests set out in the NPPF. Action: Amend policy to ensure consistency with NPPF, including key tests for development affecting the significance of heritage assets and their setting.
592	DM170.	John Crompton, Chair, Muswell Hill CAAC	Rewording	@ Para 2.94: Delete at risk Yes, end that sentence at Conservation Area @ Point E Add "regardless of whether these features can be viewed from the public domain" ? after windows add "both the material used for the frames and the glazing bar pattern"	Noted. The policy will be amended to ensure it is better highlights the significance of heritage assets and their setting. Action: Amend policy to ensure consistency with NPPF, including reference to the significance of heritage assets and their setting.
607	DM171.	Muswell Hill & Fortis Green Association	Text change	The Association is concerned to ensure that the cumulative loss of architectural features is limited and preferably stopped altogether in all areas in the Borough. It is, however, recognised that this is particularly important in Conservation Areas and consequently wish to see the all the words after " Conservation Area" to be deleted	Noted. The Council shares the concern with loss, individually or cumulatively, of heritage assets. The policy seeks to preserve and enhance the significance of heritage assets and their setting, in line with the NPPF and Strategic Policy SP12. The policy will be revised to set out further requirements for Conservation Areas. Action: Action: Amend policy to ensure consistency with NPPF, including reference to the significance of heritage assets and their setting. Further details on conservation areas.
607	DM172.	Muswell Hill & Fortis Green Association	Visibility from public domain	RE Point E. d: The Association is aware of applications for consent where the proposal materially detracts from the character of a building and / or neighbourhood but is not visible from the public domain. We would therefore add the following to the end of the paragraph: ".....regardless of whether these features can be viewed from the public domain."	Noted. The policy will be amended to ensure it is better highlights the significance of heritage assets and their setting. Action: Amend policy to ensure consistency with NPPF, including reference to the significance of heritage assets and their setting.

Comments on DM13 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
592	DM173.	John Crompton, Chair, Muswell Hill CAAC	Rewording	Suggest changing "initiatives" (final word) to "context" or "environment".	Noted.
628	DM174.	DP9 on behalf of Tottenham Hotspur Football Club	Supports	Supports potential for heritage assets to be used as a catalyst for wider regeneration.	Council welcomes support for this policy.

Comments on DM14 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
421	DM175.	Historic England	Facade	It is important to ensure which circumstances this policy will be applied. For example we would seek to ensure that the policy wording and supporting text highlights the need to understand the significance of heritage assets before considering facadism. This could include the use of a building or its layout which may contribute to the significance of, say a conservation area.	The policy will be amended to clarify the circumstances in which it applies. Action: Amend policy to reflect that it applies to buildings that contribute to the significance of heritage assets and their setting.
694	DM176.	Iceniprojects on behalf of Berkeley Homes	NPPF consistency	This policy is unsound as it is not justified and is not consistent with national policy. This policy appears to relate to all buildings, regardless of whether they are heritage assets (and designated or non-designated). It is surprising that this is the Council's intention, it is assumed that this policy was meant to be applied to listed buildings, locally listed buildings and buildings of merit in a conservation area. A balanced judgement on façade retention of a heritage asset should be based on an understanding of the asset's significance. The policy does not convey this. This being the case, the judgement to whether the façade or side facades of a building can be adequately taken in accordance with either Paragraph 133-135 of the NPPF. Draft Policy DM14 should be deleted.	Noted. The proposed policy is intended to refer to listed buildings and other buildings which contribute to the significance of heritage assets and their setting. The policy will be amended to reflect this and ensure consistency with the NPPF. Action: Amend policy to reflect that it applies to buildings that contribute to the significance of heritage assets and their setting.

Comments on DM15 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

No comments