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HIGHGATE  
LONDON  
N6 6BS

Comments from the Highgate Society on the Draft New London Plan.  
March 2018.

The Highgate Society is one of the largest and most active amenity societies in London and the comments given below are from its various members and the Highgate CAAC. In addition to studying the Plan, many contributors have attended the various events providing more information and discussion on the Plan. The comments are supported by the Highgate Neighbourhood Forum.

Highgate is a hilltop area in north London, split mainly between two London Boroughs, Haringey and Camden with small slivers of Islington and Barnet. The boundary runs along the centre of Highgate High Street and the Highgate Neighbourhood Forum was set up to achieve coherent policy across both Boroughs. This resulted in the Highgate Neighbourhood Plan (HNP), adopted in July 2017, the first cross boundary Plan to be adopted in the country.

**Most of the area is covered by Camden and Haringey's Conservation Areas and there is a significant number of listed buildings, particularly in Highgate's historic village centre.** It is also a green area with many significant open spaces and ecological corridors.

The new draft plan is welcomed in principle but we feel it falls short in a number of areas. The first and most important is the continuing belief in growth. 130,000 EU nationals left the country last year and inward investment in property from the Far East and Russia has all but stopped. Whilst it is hoped that London will continue to grow sustainably, there appears to have been no analysis of the impact of Brexit on London and the possibility that the economy and population of London may remain static, if not shrink.

#### Comments, Objections and Support on specific policies

introduction	<p>Comment</p> <p><i>Other than a brief mention in 0.0.9 in the introduction, there is no mention of Neighbourhood Planning and the impact this will have on the planning system of which it is now a formal part, and of particular importance in achieving community engagement in the Planning of London's environment.</i></p>
<p>Chapter 1: Planning <b>London's Future</b> (Good Growth Policies)</p>	<p>Object</p> <p><b><i>This section rests on the assumption that London's recent economic growth will continue at its present level; however the impact of Brexit may well alter the picture, and the continuing impact of immigration must also be considered. Thus any long-term planning for growth must therefore be flexible to address possible changes from the current situation.</i></b></p>
Policy GG1	<p>GG1(D) - Comment:</p> <p><i>This Policy calls for the promotion of the role of town centres in improving the social, civic and economic lives of Londoners, both during the day and in the evening which is welcomed. What is not said is how this can be achieved. There are two major threats to sustainable communities in London – <b>the competition from "out of town" shopping centres</b> and the growth of internet shopping. <b>Even in London there is a dominance of "out of town" shopping centres with free parking, which suck business out of the town centres, where parking is often heavily restricted.</b> However the appearance in recent years of small branches of the major supermarkets shows that, given the choice, Londoners would</i></p>

	<p>willingly shop in their local high street.</p> <p>The second issue of internet shopping does not seem to have been addressed. Not only is it destructive of town centres but additionally creates additional traffic through deliveries, with added congestion and pollution GG1 (F) Support</p> <p>This is welcomed but is caveated by the response to GG2E below</p>
Policy GG2 Making good use of the land	<p>GG2 (E) – Object</p> <p>This issue ought to be much more nuanced. It is simplistic to conclude that transport by car is bad per se and should be reduced to 20% of all journeys. Walking, cycling and public transport at present levels is not always suitable for the elderly, those in poor health or disabled, for transporting goods or for heavily pregnant women. In addition in outer London and particularly for orbital travel, public transport is simply not available. In Highgate, we have excellent north south connectivity but are poorly connected east-west despite many years of lobbying TfL to address this. Access to Haringey Town Hall requires a journey into Kings Cross and out again on 3 very slow buses.</p> <p>It is conceivable that the development of electric or other non-petrol vehicles will lessen environmental problems associated with motorcars. If car dependency is to be discouraged in the short term the concept of public transport must be reconsidered. The main focus must be on the convenience of the public consumers of the service.</p> <p>Other than convenience, there is also the factor of cost. The cost of rail travel relative to income is greater than in other European countries. London cannot possibly house all those who work here, and no increase in housing stock is likely to solve this problem.</p> <p>Planning new developments to reduce car dependency is called for on health grounds. Even now many developments have very restricted car parking spaces. However this will improve the life of Londoners only if the available public transport is convenient and affordable.</p>
Policy GG4 Delivering the homes that Londoners need	<p>Support and Object</p> <p>The principle of this is agreed and welcomed.</p> <p>However, there is little to ensure that permission for residential use will be built for sale or rent on the open market at prices Londoners can afford. Too many luxury flats have been developed which remain empty and do not address the housing crisis in London.</p> <p>GG4 (B) Strongly Object</p> <p>The strategic target of 50% affordable housing is unrealistic without measures to ensure that this can be delivered. Currently there is a reliance on developers to deliver housing. Discussions the Society has had with those involved in the provision of housing have suggested that anything higher than 25% is not viable for developers and that they will simply not build. Affordable housing needs to be built by dedicated provider such as Councils, and properly funded.</p> <p>GG4 (E) Support and comment</p> <p>Too often, sites gain planning with high quality <b>design which are then “value engineered”</b> at construction stage to considerably reduce the design quality. Measures should be taken to ensure quality design obtained at planning is carried through to completion.</p>
Policy GG5	<p>GG5(D) Object</p> <p>As in the Society’s <b>response to GG2 above</b>, new housing has to include houses and flats at prices that Londoners can afford to buy or rent on the open market as well as a proportion of <b>“affordable”</b>. Too many developments are aimed at the luxury market but there is nothing in the Planning System to legislate for sale prices that ordinary Londoners can afford</p> <p>In addition, too many large schemes have been completed with inadequate infrastructure. Funding for this needs addressing.</p> <p>GG5(F) Support and comment</p> <p>The Society feels that Heritage Assets are inadequately protected in London. Statutory listing does offer protection, but <b>in Highgate’s case</b>, the Conservation Areas have been woefully degraded in recent years through local authority decisions, or Appeal decisions. Local Councils are remarkably resistant to the application of Article 4 directions, which would protect these, citing lack of resources.</p>
Chapter 2: Spatial Development Patterns	
Policy SD6 Town centres	<p>SD6(A2) Object</p> <p>This policy seeks to achieve its aim through <b>“high density renewal”</b>. <b>Whilst this does not apply to all of London’s town centres</b>, others such as Highgate, Hampstead or Barnet have a historic core and this has been part of their attraction, both in terms of a liveable</p>

	<p>environment and attracting people and businesses. <b>The Plan must make clear that “high density renewal” must take account of, and be sensitive to, London’s unique and irreplaceable heritage and Conservation Areas.</b></p> <p>The plan calls for tourist infrastructure, attractions and hotels in town centre locations, but clearly many town centres do not have land available for such uses.</p> <p>SD6(H) Comment</p> <p>This calls for the delivery of barrier-free and inclusive town centres, meeting the needs of all Londoners including the elderly, the disabled and families with young children.</p> <p>Interestingly, public toilets are suggested, as are (elsewhere in the plan) public benches and drinking fountains. The points about access, improved public transport and parking for cars (as mentioned above) could be applied here.</p> <p>Table A1.1 <b>The Plan’s Town Centre proposals</b></p> <p><b>An examination of the Plan’s town centre list shows a division into International town centres, Metropolitan town centres, Major Town Centres and District Town Centres, together with several smaller categories, 239 in all. Centre Index.</b></p> <p>The Society is concerned that Highgate High Street and Archway Road, both community-based shopping streets, are excluded from this list. Because the Plan sees the London Boroughs as the prime planners and movers in its implementation this puts Highgate in an unfortunate position, with no single borough having overall responsibility for Highgate as a whole. In this respect it is disadvantaged, in comparison with Muswell Hill, East Finchley, Archway, Kentish Town and many other similar areas which are designated coherent District Town Centres which will be monitored and represented by the boroughs in which they are located.</p> <p><b>Despite the fact that Highgate is divided between two boroughs, Highgate’s unique position and interests as a world class heritage site, with valuable green spaces and attraction to other Londoners and to tourists, makes it essential that it is regarded as a distinct area with distinct interests. The Highgate Neighbourhood Plan looks at Highgate holistically and so must the London Plan.</b></p>
<p>Policy SD9 Town centres: Local partnerships and implementation</p>	<p>SD9 (C) Support and comment:</p> <p>This is welcomed. The application of PD Rights from B1 to C3 has resulted in a large number of substandard and non compliant dwellings, whilst having a negative impact on employment and the viability of shopping centres. However, boroughs need the resources <b>to set up Article 4 Directives. In the Society’s experience, lack of resources is cited as a reason for not proceeding with Article 4 Directives.</b></p>
<p>Chapter 3 Design</p>	
<p>Policy D1 London’s form and character</p>	<p>Support and object</p> <p>The intentions are very good, but this policy is too general and seemingly not linked to any standards or actual size/detailing/process requirements. The below points require not only a good architect/planner, but also very capable people in the councils and clients that are ambitions on behalf of design. Since design is also a major concern for local communities, early pre-application consultation with communities is essential and must be required in the Plan. Very little of the below is measurable, and it will therefore be up to the developer and the case officer to determine what “good design” is since this is all too often a subjective decision, based more on resources and development profits than on appropriateness for the setting, this makes early community engagement all the more important.</p> <p>D1B(1) Object</p> <p>This policy directly contradicts D6 tall buildings. We cannot see how tall buildings can deliver building that are of scale. Too often these are placed in localities adjacent to rows of 2 and 3 storey housing or adjacent to open spaces. It is also difficult to see how a tall building can respond to street hierarchy</p> <p>D1B (2) Support and Comment</p> <p>This is supported but the problem which exists is how it will be achieved for the whole process. Hopefully D2H will resolve this</p> <p>D1B (4) Object</p> <p>The policy covering the <b>“respect, enhance and utilise” Heritage Assets needs strengthening to “preserve” heritage assets.</b></p>
<p>Policy D2 Delivering good design</p>	<p>D2 Support</p> <p>This policy is generally supported with the following caveats..</p> <p>The Boroughs are being asked to prepare new development plans according to the points set out in D1 to determine capacity for growth. It is also unclear who will prepare the masterplans and design codes bearing in mind the resources and skill shortages in</p>

	<p>planning departments. This task must not be taken over by private sector since it takes decisions out of local hands, and may well give rise to a conflict of interest since may private sector consultants may be handling other projects for the same applicants.</p> <p>D2A (7) Support As in the response to GG2 the Society feels that the heritage assets are inadequately protected in London. <b>There must be a policy to “protect” heritage assets..</b></p> <p>D2F and D2G Support and Comment The importance of design reviews is welcomed but this policy falls well short of ensuring it happens on any but the most extreme developments. Only projects referable to the Mayor and optimising density or falling into the category of tall buildings must undergo design scrutiny/design reviews. This excludes a whole raft of other development</p> <p>There should be a greater obligation to use design review panels written into the plan. The Design Review comments should be made public i.e. on the planning website, and in timely manner so that public and other interested parties such as the Victorian Society can comment if they so wish</p> <p>D2H Strongly support This is welcome. Too many schemes changes architect after planning is gained with a high <b>quality design architect being supplanted by the developer’s own production drawing firm,</b> with very often, heavy cost cutting as well a loss of detail. Some built schemes are unrecognisable from that which has gained planning approval.</p>
<p>Policy D4 Housing Quality and standards</p>	<p>Support and comment The attempt to add quantitative measures to ensure housing quality is supported as development cannot be judged holistically on “quality” alone. However, this policy seems to replicate the existing situation and including space standards as set down in table 3.1 and therefore the Society has no further comments on this except to question how the challenges will be met as under D1 and D2 . Even if the space standards and ceiling heights are met, many councils no longer have sufficient conservation and design resources to judge the design objectively.</p>
<p>Policy D6 Optimising Housing Density</p>	<p>Object and comment This section states that any development that does not optimise site density should be refused. In section D5, where the extremely small minimum space standards are set out, it says that developers will be encouraged to exceed these standards. This appears to be a contradiction. In addition, it is completely counter to Principles of Conservation Area protection and would fatally undermine the ability of a community to secure appropriate development in a Conservation Area. We suggest that it would raise issues of Human Rights to prevent someone who wanted to build a small unit on their land from doing so. Infrastructure capacity should be planned/amended to support proposed new densities. Infrastructure should include facilities such as nurseries, schools, medical centres, corner shops and rubbish bins as well as public transport and parks. If a minor developments will not have to undergo infrastructure assessments, is there a mechanism for assessment the cumulative impact? This section states that any development that does not optimise site density should be refused. In section D3, where the extremely small) minimum space standards are set out, it says that developers will be encouraged to exceed these standards. This appears to be a contradiction. Infrastructure capacity should be planned/amended to support proposed new densities. Infrastructure should include facilities such as nurseries, schools, medical centres, corner shops and rubbish bins as well as public transport and parks.. If a minor developments will not have to undergo infrastructure assessments, is there a mechanism for assessment the cumulative impact?</p> <p>D6D – Support An assessment of density based on habitable rooms, bedspaces and bedrooms is welcome. A unit based density calculation does not accurately give an assessment of the number of people living on the development. For instance a site with a majority of 1 and 2 bed units will have considerably fewer demands on infrastructure and amenity than of with a majority of 3 and 4 bedrooms.</p> <p>D6E Comment This policy requests various measures of density be provided but offer no prescriptive targets so it is not clear how this information will be assessed. It appears to be a data collection mechanism.</p>
<p>Policy D8 Tall Buildings</p>	<p>Strongly object</p>

	<p><i>The introduction claims that tall buildings are justified on the basis of accommodating expected growth and that they support legibility. The first of these comments is addressed elsewhere but the second statement is nonsense. Although the exceptional high building such as the Shard is a landmarks, the conglomerations of high buildings such as those at Nine Elms are just the opposite. There are a substantial numbers of Londoners who strongly oppose the construction of the 460 odd new towers either built or with permission and which they see as permanently damaging the unique character of London and to justify these eyesores on the basis of improved legibility is insulting to those people. This statement should be removed.</i></p> <p>D82 (B) Part support, part strongly object</p> <p><i>The Society recognises that there is a place for tall buildings in economic hobs such as Canary Wharf where the layout is carefully planned. What the Society does not agree with is that the provision of tall buildings helps to meet the housing requirements. There are two major problems with this approach. The first is that of the towers already built, the majority of these are luxury flats selling in the £500,000 - £1,000,000 bracket. These are simply out of the reach of the majority of Londoners seeking homes to buy, and due to the halting of overseas investment in these, a substantial number main empty or unsold. The second is <b>the suitability of tall buildings for new homes. In the 70's, the GLC and other London Boroughs abandoned their policy of building tall buildings to house families and social housing and it is shocking to see this policy again accepted, particularly after Grenfell Tower. There are many other forms of building which meets the needs of housing Londoners including mid rise and terraces. Exemplars such as the late Victorian mansion blocks and Camden's Alexandra Road show high density can be achieved without high rise.</b></i></p> <p>D8C Support and object</p> <p><i>Whilst the principle set down here are welcomed, there is currently a lack of a strategic approach on the impact of tall buildings on London and a failure to acknowledge the negative impact tall building can have not only on the immediate neighbourhood in which they are located, but also way beyond borough boundaries. Effective urban planning which looks at the impact of conglomerations of tower blocks needs to be addressed. Too often tower blocks are each approved on their individual basis without looking at the relationship with between each other and one just has to look at Stratford High Street between the Town Centre and Bow flyover and Canning Town to see a dystopian vision of the future.</i></p> <p>D8C (e) Object</p> <p><i>It is difficult to see how tall buildings in a World Heritage Site can preserve the Outstanding Universal Values. London should look at the example of Liverpool and ban them in proximity to these Sites.</i></p> <p>D8C (f) Comment</p> <p><i>The buildings on the Thames have already contributed to a canyon effect on the river and the majority of approval awaiting construction are in this location. Can the GLA prevent this?</i></p>
Policy D9 Basement Development	<p>D9(A) Support and object</p> <p><i>The policy on basement development focuses on large scale basement development (defined as multi-storey and /or those that extend significantly beyond the existing footprint of the building) rather than small scale basement development (not defined but presumably single storey and within existing footprint of a smaller building). Small scale basement development is what affects most adjoining property owners in London. It has caused major problems in Highgate, an area of complex geology and hydrography, and in an extreme case an adjoining house experienced major subsidence.</i></p> <p><i>This policy offers no further protection for small scale basement development whilst saying that these developments will be covered by the planning process but only within a Conservation Area or if an Article 4 direction has been made. Additionally it does not address the different types of housing stock in London from Victorian terraces and large stand alone mansions.</i></p> <p><i>Whilst the Society welcomes that basements in a Conservation Area/Article 4 Directive as exempt from PD rights, our experience, and that of communities across London, makes it clear that this exemption must apply to all basements.</i></p> <p><i>The Policy refers particularly to Inner London. However, experience make it abundantly clear that the impact of basements developments on neighbours is equally severe in all Boroughs. Differentiating on such an issue merely on grounds of whether it is in inner or outer London is illogical and there must be no differentiation.</i></p>

	<i>This policy could therefore be read as giving the go-ahead to small scale basement development in London.. As detailed above, this is completely unjustifiable. Basement development is not only a predominantly inner London problem, but a London-wide problem. The policy as currently proposed will not address, but will exacerbate, the situation. This would not be a good outcome.</i>
Chapter 4 Housing	
Policy H1– increasing housing supply	<p>Object</p> <p><i>There is undoubtedly a shortage of affordable housing, but the rush to build housing when there are 400,000 unimplemented planning applications in the country with over 250,000 of them in Greater London and 27,000 unsold flats in London suggests that the problem is significantly more complex than this Policy acknowledges. There is something broken in a system which cannot provide housing that is affordable to buy or rent for those who make London a vibrant city. The Society believes this relates to the method of procurement rather than to a shortage and that targets as set down in table 4.1 are crude, damaging to the environment and will prove impossible to implement</i></p> <p><i>Whilst the plan does refer to infrastructure in other sections it is not clear how this will be implemented. The general view is that much of this has been said before and if the Mayor does intend to address the housing problems, the plan needs a robust implementation of policy focused on affordability, including in the market sector, and supported by resources.</i></p>
Policy H2 - Small Sites	<p>Support and Object</p> <p><i>The principle of developing small sites is welcomed with reservations. However there are major problems in that current procurement procedures make it almost impossible for smaller developers to work in the public sector, because framework agreements and the pre qualification questionnaires have a default position which automatically cuts out the smaller suppliers. This will result in the same large scheme developers (eg.Carillion etc), delivering on small sites which will not result in the diversity as set down in Policy in H2A.2.</i></p>
Policy H5 – Delivering affordable housing	<p>H5A.5 - Object</p> <p><i>Strategic partners should deliver at least 60%affordable housing and more for the first 5 years. The number of affordable homes built each year reduced from 2010 at 36,700 to 1,102 in 2016/17. However, this will require public funding, as in our responses to Policy GG4 (B) above.</i></p>
Policy H7 – Affordable housing tenure	<p>Object</p> <p><b>An “affordable” rent in London is taken at 70-80% of market value. This is patently discriminatory against the majority of key workers Rents in high value areas like Highgate, and possibly over most of London, are still not “affordable” even with this reduced percentage.</b></p> <p><i>The balance/loss of rented accommodation through RTB over the years should be addressed.</i></p>
Policy H12	<p>H12 (B) - Object</p> <p><i>We strongly contest the argument that the largest category of homes needed are for one bedroom units, and consider that the proportion of these should be should be restricted to a max. of 40% . They are not sustainable and are discriminatory against even small family units.</i></p> <p>H12D - Object</p> <p><i>Size of units- The UK has had one of lowest space standards in Europe since Parker Morris Standards were abolished. New standards need to be establishes to get away from the grossly substandard units commonly being built They should have suggested layouts and allow growing families to adapt the space to their changing needs.</i></p>
Chapter 5 Social Infrastructure	
Policy S6 Public Toilets	<p>Support and comment</p> <p><i>We have reviewed this policy in relation to public toilets and would strongly support all of the points. We would particularly support the importance of good public toilet provision to allow shops and local businesses to be as accessible as possible.</i></p> <p><i>Over the last years the Highgate Society has worked closely with Camden Council to find a viable way for existing public toilet facilities in the Camden borough to be kept open. We would recommend that the aim of supporting London councils to retain existing public toilet facilities wherever possible is added to this policy</i></p>
Chapter 7 Heritage	Support and object

and Culture	<p><i>In general, the Society finds the policies in this section encouraging. There are some issues, which have been highlighted below, plus positive aspects that will be beneficial, as long as they are adhered to.</i></p> <p><i>However, one clear thing underlines this, which is that in several clauses, it is necessary to re-word the policies so that Conservation Areas are clearly included among, and also designated, as <b>'Heritage Assets'</b>. As a general point the assumption is made throughout the chapter that Heritage Assets are buildings of some kind. This assumption is incorrect. National legislation and guidance is very clear that Conservation Areas are Heritage Assets in themselves.</i></p>
Policy HC1 – Heritage conservation and growth:	<p>HC1(A) -Support <i>This is a good and strong statement with clear heritage-led objective.</i></p> <p>HC1(B.2) - Object <i>This is a clear directive, but the Society has seen little evidence that the two major boroughs with which it deals have dealt effectively with this, where the fundamental issue is one of implementation and enforcement. To strengthen this, it is suggested that the following is added <b>"The cumulative effect of incremental change from development on Heritage Assets, particularly Conservation Areas....."</b></i></p> <p>HC1(B.3)- Object <i>This Policy is somewhat contradictory and potentially allows for poor handling of <b>heritage/conservation areas under the aegis of "innovation" and "creativity."</b> In our view it would be better to delete and let HC1(C) stand alone, since it states the same aim and intention more unambiguously. However, if it determined to retain it, its sense could be <b>made clear by starting the paragraph: "Where regeneration or new development within Heritage Assets is necessary and appropriate, the purpose must be to integrate the conservation and enhancement..."</b></i></p> <p>HC1(A) -Support <i>This is a good and strong statement with clear heritage-led objective.</i></p> <p>HC1.B2 - Object <i>This is a clear directive, but the Society has seen little evidence that the two major boroughs have dealt effectively with this so the question is one of implementation and enforcement. To strengthen this, <b>it is suggested that the following is added . "The cumulative effect of incremental change from development on heritage assets , particularly conservation areas....."</b></i></p> <p>HC1(B.3)- Object <i>This Policy is somewhat contradictory and potentially allows for poor handling of <b>heritage/conservation areas under the aegis of "innovation" and "creativity."</b></i></p> <p>HC1 (C) Support <i>This is a good clear and unambiguous statement which identifies both the relevance of the heritage asset as important, and the importance of managing incremental or cumulative change. This is something which has proved a particular problem in the Bishops sub-area of Highgate, and we would expect to see Conservation Area policy specifically mentioned as covered by the remit of this policy..</i></p> <p>HC1(E) Support <i>This policy <b>addresses assets "at risk" and gives good, clear direction to Boroughs not to ignore.</b> This will be helpful where Conservation Areas, or any part of them, are identified as suffering from over-development or poor design</i> <b>Para C mentions 'developments affecting heritage assets; again, Conservation Areas need a specific reference. Therefore add "where "heritage assets including Conservation Areas have been identified etc..."</b></p>
Policy HC3 – Strategic and local views:	<p>Support and comment <i>This policy vests too much discretionary power with the Mayor alone, in identifying significant views. It will be better to state that this task must be done in collaboration with local authorities and relevant local groups including amenity societies, CAACs and Neighbourhood Forums. Apart from this, we support it as a strong, aspirational policy.</i></p> <p>Table 7.1 London Panoramas <b>In Highgate's case, being</b> a historic hilltop location, visible both from and to Central London, there are number of important additional views which should being added to this table. These include:</p> <ul style="list-style-type: none"> <li>• a view from the top of Waterlow Park overlooking London to the South (one of the few places from which St Pauls can be viewed without the intrusion of tall buildings)</li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Parliament Heath to the east towards the Highgate Ridge including the spires of <b>St Michael's Church and St Anne's' and St Joseph's dome Holly Lodge the Cemetery Athlone House and the whole west facing slope of the Ridge</b></i></li> <li>• <i>View down Archway Road , under Hornsey Lane Bridge to St. Pauls represents a true gateway to London from the north</i></li> <li>• <i>Upper junction of Southwood Lawn Road and Southwood Avenue giving extensive views over east London to Epping Forest</i></li> <li>• <i>We would also recommend that a number of important, but currently unprotected, views to the Hampstead-Highgate Ridge, which afford Londoners valuable views of a virtually uninterrupted skyline of predominantly trees and greenery, should be designated.</i></li> </ul>
Policy HC4 – London view management framework:	<p>Comment</p> <p><i>The London View Management Framework is good, building on the above policy, but the wording should enable “and require” inter-borough cooperation.</i></p>
Policy HC7 – Protecting public houses:	<p>HC7.B – Support and comment</p> <p><i>The presumption on loss of pubs should read that reasons for refusal should not comprise those where it can be proven that <b>they have “heritage, cultural, economic and social value.”</b> Indeed, all will have one or more of these attributes. Some boroughs, such as Islington, have stringent requirements in terms of proving inability to let, which should be adopted as a London wide policy.</i></p> <p>HC7.C</p> <p><b><i>Development that compromises the operation or viability of a pub “is not to be approved,” (not the weaker, “should be resisted”). The Highgate Society has experience of proposals aimed at securing closure of a pub to achieve more valuable “luxury” housing by reducing their size until they become unviable.</i></b></p>
Chapter 8 Green Infrastructure and Natural Environment	<p>Object</p> <p><i>There is nothing in these policies that mentions gardens or backlands development. This is something which is essential to retain in Conservation Areas, where the character of the area is determined not just by the individual buildings but also their setting. London has a uniquely landscaped setting which makes it attractive as a world city and this should be preserved..</i></p>
Policy G1 – Green infrastructure:	<p>G1.C - Comment</p> <p><i>The recommended Development Plans and Frameworks should be devised in consultation with relevant local bodies and groups, e.g. the owners of major public open spaces, the Hampstead Heath and Highgate Wood Consultative Committees, the Friends of London Parks and individual Park's friends groups.</i></p>
Policy G2 – London's Green Belt:	<p>G2A - Object</p> <p><b><i>While we strongly support the Mayor's commitment to support “the continued protection of London's Green Belt”, the wording should be strengthened and clarified, to state that the Green Belt should be protected “from development,” thus removing the word “inappropriate.” Leaving that word in allows for a lot of debate and subjectivity over what is or is not inappropriate, and inevitably will lead to loss of Green Belt.</i></b></p> <p>G2A.1 /G2A.2 - Comment</p> <p><i>These sub-points contradict on another by first stating that harmful development should be refused, while recommending “enhancement... to provide appropriate multi-functional uses.” Appropriate needs a closer definition to avoid unacceptable developments being approved through ambiguity and misunderstanding.</i></p>
Policy G3 – Metropolitan Open Land:	<p>G3A - Object</p> <p><b><i>As for G2, the two sub-points are contractory and lack definition. “Harmful development”, “range of uses” and “partners” need definition</i></b></p> <p>G3C – Object</p> <p><b><i>The words “Neighbourhood Plan process” should be added here. It is worrying that the Mayor is, apart from 0.0.9, silent on Neighbourhood Plans in this document.</i></b></p> <p><i>In addition, since Metropolitan Open Land is the urban equivalent of, and has the same status as, Green Belt, the same considerations should apply to MOL as to Green Belt. Any other approach will risk undermining the status of MOL and diminishing the ability of Local Authorities and communities to protect their MOL.</i></p>
Policy G4 – Local green and open space	<p>G4D - Object</p> <p><b><i>This should be stronger and not restricted to loss of green space in “areas of deficiency.”</i></b></p>

	<p>Loss of green space in other areas will obviously turn them into areas of deficiency. This would result in a weakening of the Ecological Green Corridors (identified in Policy G6B(1) as assets needing identification and protection) on which the viability of major and minor open spaces depend, so all loss should be resisted</p>
Policy G5 – Urban greening:	<p>G5A - Object The wording in this policy should be strengthened to state that major development proposals “<b>must</b>” contribute to the greening, not just “<b>should</b>”. The “<b>high quality landscaping</b>” mentioned should “<b>require</b>” tree planning, not just “<b>include</b>” it as an option. A developer’s responsibility should also extend to the areas adjacent to the large development ensuring that street trees are retained or replaced. . <b>And, once again, the definition of “high quality” must not be left to pre-application discussions between Planners and Developers; the views and expertise of affected local communities and Design Forums must also be required as a part of the planning process.</b></p> <p>G5B - Object The target UGF (Urban Greening Factor) for development seems too low mentioning only <b>grassy areas, green roof, permeable paving...</b> There are options to include drainage, flora, etc. and these should be the targets, so the aim is to perform at an optimal level, not the bare minimum. <b>It is also unclear what is meant by “tailored to local circumstances”. Does it mean that if there is a lot of open space in an area, then the developer must provide a commensurate amount of urban greening, or is less necessary than in an area of open space deficiency? Indeed, the differential for residential and commercial developments seems completely mistaken. Residential developments are required in any case to incorporate amenity open space and gardens, while commercial developments will endeavour to maximise economic aspects by minimising the amount of greening. In particular, the redevelopment of a fully-developed commercial estate should be used as the opportunity to introduce a higher Urban Greening Factor than existed previously.</b></p>
Policy G6 – Biodiveristy and access to nature:	<p>G6A - Object <b>Strengthen wording to insist SINC’s “must” be protected, and remove scaling of proposed protection so that all sites benefit, not just those deemed most significant.</b></p> <p>G6B .1 Comment On identifying SINC’s or Sites of Metropolitan Importance, Boroughs “<b>will be required to consult not just London Wildlife Sites Board, but also other relevant organisations, particularly those with local knowledge and experience</b>” and especially those responsible for the management of ecological spaces, such as the City of London, the Royal Parks, etc., as well as relevant community groups.</p> <p>G6C Comment Where harm is unavoidable to a SINC, the mitigating procedures that are outlined “<b>must</b>” apply, not just the vaguely aspirational “<b>should</b>” apply.</p> <p>G6C.1 Comment <b>“Avoid adverse impact ...” This is the first mitigating procedure where harm is unavoidable – if there is harm, there is adverse impact. This should be re-worded to say: “There should be no adverse impact...”</b></p> <p>G6E – Support and comment: This is for new proposed sites, and this should be encouraged. New green habitats should be approved by strict tests set by outside expert bodies, not just the council involved and certainly not solely on the word of the developer. <b>However, “should be considered positively” is, in effect, meaningless in a planning context and will be ignored. This should be replaces with “should be given preference, and adequate provision of such habitats should be required where they are not a part of a development proposal.”</b></p>
Policy G7 – Trees and woodlands:	<p>Support The Society strongly supports a robust tree policy but feels that the policy could be strengthened as below:</p> <p>.G7B - Comment <b>Strengthen wording so that Local Plans “must” protect trees and provide opportunities of planting. On the protection of veteran trees and ancient woodland, the Plan could be interpreted as contradicting itself by stating that this does not apply where these are already part of a protected site. As Highgate has regularly experienced, group protection of trees</b></p>

	<p><i>within a whole area is not strong enough to prevent individual trees being felled, as planning officers <b>often don't consider such an action as having much of a negative effect.</b></i></p> <p>G7(B).1 - Object</p> <p><i>On the protection of veteran trees and ancient woodland the Plan does not apply where these are already part of a protected site. As Highgate has seen, over-arching protection of a whole area is not strong enough to prevent individual trees being felled, as planning officers <b>often don't consider such an action as having much of a negative effect.</b></i></p> <p>G7C – Support and Object</p> <p><i>We strongly support the statement that replacement trees should reflect the “existing value of the benefits of the trees removed.” This could help ensure that if a large oak were removed to facilitate a development, it would not be acceptable to claim the planting of a box hedge was suitable compensation. <b>Existing trees of “quality” is a dangerously vague phrase.</b> In our experience, arboricultural reports will frequently endeavour to justify the removal of trees or their severe pruning to facilitate development by denigrating them as of “low quality”, in the knowledge that planning officers rarely have the skills to confirm this. There should be a requirement for independent verification of this. In addition, a young tree, particularly if self-seeded, may well grow to be the “quality” tree of tomorrow. We strongly urge the deletion of the words “of quality.”</i></p>
Policy G8 – Food growing:	<p>Support and Comment</p> <p><i>We are pleased to see a commitment to protecting allotments and encouraging greater local food production, and suggest that a clause be added, either here or to the Policy on Green Belt, to the effect that the use of Green Belt Land for food production, of a type which does not adversely impact on its open and green character, will be actively encouraged.</i></p>
Chapter 9 Sustainable Infrastructure	
SI1 - Improving Air Quality	<p>SI 1 Support</p> <p><i>The principles of SI1 to ensure that new developments should not adversely affect air quality, either during construction, or for residents after they move in is supported. Additionally LETI requests the adoption of a kWh/m2 metric rather than a Part L comparison and requests the calculation of unregulated energy/CO2 as well as regulated. LETI also makes suggestions about Borough SPGs and GLA assistance on compilation. SI 1 A 4) Comment.</i></p> <p><i>During the construction phase there should be monitoring and spot inspections of the air quality at each construction site – independent, but paid for by the developer, with power to halt work when infringements are discovered to prevent localised exposure. SI 1 A 6) Comment.</i></p> <p><i>No statements that air quality cannot be achieved should be accepted until an air quality professional, independent but paid for by the developers has reported.</i></p>
SI2 Minimising greenhouse gas emissions.	<p>Comment</p> <p><i>We support the work conducted by the London Energy Transformation Initiative (LETI) that is based on the experience and knowledge of top building professionals from London and across the world, and included in our submission where indicated. The full recommendations are available from the LETI London Plan recommendation report <a href="https://docs.wixstatic.com/ugd/252d09_b693dc7f0eba49cda769ca6d0ab70df0.pdf">https://docs.wixstatic.com/ugd/252d09_b693dc7f0eba49cda769ca6d0ab70df0.pdf</a> and <b>noted by 'LETI' where their work is used. SI 2 general comment.</b> we urge the use of LETI wording for 9.2.9, 9.2.10 g, 9.2.10 h, 9.2.10 i and 9.2.10 k.</i></p> <p>SI 2A. Comment:</p> <p><i>We urge the use of LETI wording to bring forward zero carbon emissions to 2030 and to <b>add the requirement 'be seen' for post build monitoring and verification.</b></i></p> <p>SI 2B. Comment:</p> <p><i>We urge the use of LETI wording</i></p> <p>SI 2C. Comment:</p> <p><i>We urge the use of LETI wording</i></p> <p>SI 2E. Comment:</p> <p><i>We urge the use of LETI addition re a nationally recognised carbon lifecycle assessment. As well as the LETI recommendations we would want all proposals to demolish a building to include submitted calculations showing CO<sub>2</sub> emissions for one scenario for the new</i></p>

	<p>development, including the demolition of the existing building, and a second scenario for refurbishment of the building. It will be in terms of Global Warming Potential (as specified in <b>EN 15804</b>) i.e. in 'kg CO<sub>2</sub> equivalent.' Where kg CO<sub>2</sub> equivalent is significantly higher for the demolition scenario the application should be refused, unless there are more significant advantages.</p>																																
<p>SI 3 Energy Infrastructure</p>	<p>Comment: We urge the use of LETI wording for 1) a-d regarding Heat Network proposals and designs, and suggestions for SPGs on heat networks air quality and affordability aspects.</p>																																
<p>SI8 waste capacity and waste self sufficiency</p>	<p>Support and Comment, Especially the zero waste export from London by 2026. Additionally we would require that every Borough adopts consistent recycling requirements for residents to avoid low recycling <b>rates due to misunderstandings from London's frequently moving population.</b> SI 8 C. Where new waste facilities are in the process of approval or construction they should be considered in light of the targets at 9.7.3. eg 65% recycling composting by 2030 and construction, demolition, excavation 95% recycling by 2020. If a planned waste facility is not designed to maximise recycling eg plastic extraction and for clean energy from waste and anaerobic opportunities then it should be redesigned before proceeding. Green gas maximisation should be designed in before any new capacity is built. See <a href="https://alansenergyblog.files.wordpress.com/2016/07/final-the-green-gas-book_96pp_v5.pdf">https://alansenergyblog.files.wordpress.com/2016/07/final-the-green-gas-book_96pp_v5.pdf</a> for the way forward. SI8 D. Comment. This should also apply to upgrading existing sites. SI8 D3) Object The target for carbon intensity of electricity produced should be better than 400g of CO<sub>2</sub> carbon intensity floor, especially by removing plastic from the feedstock and being set up to <b>take all forms of suitable waste such as used frying oil, coffee, fatbergs etc.</b> See 'Carbon Intensity' - National Grid December 2017 <b>Table 1:</b> Carbon intensity factors for each fuel type and interconnector import [2][3].</p> <table border="1" data-bbox="488 1077 818 1525"> <thead> <tr> <th></th> <th style="text-align: right;">gCO<sub>2</sub>/kWh</th> </tr> <tr> <th style="text-align: center;">Fuel Type</th> <th style="text-align: center;">Carbon Intensity</th> </tr> </thead> <tbody> <tr><td>Biomass<sup>†</sup></td><td style="text-align: right;">120</td></tr> <tr><td>Coal</td><td style="text-align: right;">937</td></tr> <tr><td>Dutch Imports<sup>†</sup></td><td style="text-align: right;">474</td></tr> <tr><td>French Imports<sup>†</sup></td><td style="text-align: right;">53</td></tr> <tr><td>Gas (Combined Cycle)</td><td style="text-align: right;">394</td></tr> <tr><td>Gas (Open Cycle)</td><td style="text-align: right;">651</td></tr> <tr><td>Hydro</td><td style="text-align: right;">0</td></tr> <tr><td>Irish Imports<sup>†</sup></td><td style="text-align: right;">458</td></tr> <tr><td>Nuclear</td><td style="text-align: right;">0</td></tr> <tr><td>Oil</td><td style="text-align: right;">935</td></tr> <tr><td>Other</td><td style="text-align: right;">300</td></tr> <tr><td>Pumped Storage</td><td style="text-align: right;">0</td></tr> <tr><td>Solar</td><td style="text-align: right;">0</td></tr> <tr><td>Wind</td><td style="text-align: right;">0</td></tr> </tbody> </table> <p>SI 8 9.87. Comment To enable the regular reviews of capacity to be constructive new waste facilities should be based on a modular design, so that, as waste reduces, they are not oversized, risking incentive to reduce waste.</p>		gCO <sub>2</sub> /kWh	Fuel Type	Carbon Intensity	Biomass <sup>†</sup>	120	Coal	937	Dutch Imports <sup>†</sup>	474	French Imports <sup>†</sup>	53	Gas (Combined Cycle)	394	Gas (Open Cycle)	651	Hydro	0	Irish Imports <sup>†</sup>	458	Nuclear	0	Oil	935	Other	300	Pumped Storage	0	Solar	0	Wind	0
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<p>SI14 Waterways – strategic role</p>	<p><b>Comment</b>  A policy should be added to always consider unculverting Londons underground streams where appropriate. Upstream misconnections of sewage should not be used as a reason to leave these assets hidden. Where such culverts contain sewage enforcement should be firm and effective.</p>																																

Chapter 10 Traffic and transport	<i>This chapter focuses on a number of policies which have established themselves as being politically correct and which would improve the lot of Londoners. However the challenge is other issues that are causing problems, often new ones, which the GLA has been slow to respond to. Some of these involve the internet or satellite navigation which have significant impact on traffic volumes, directions and speeds and have not been met in this document.</i>
KPI: Modal share	<p>Comment</p> <p><i>Definition of a trip needs clarification. Are walking to a neighbour or your car some distance away defined as trips? How many trips are involved in the various methods of transport i.e. a journey made up of walking, taking a bus and then a tube train.</i></p> <p><i>Increasing modal share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041 is an ideal, but it leaves 20% for other forms of transport, which may not be realistic in terms of older people, those with disabilities, pregnant women, poor health and carrying heavy loads as well as areas with poor public transport, particularly Outer London and orbital journeys (see below).</i></p>
Policy T1 Strategic approach to transport	<p>Comments</p> <p><i>Healthy streets should possibly be renamed 'Healthy and Safe Streets'</i></p> <p><i>The capacity for walking is mentioned in the supporting text but targets for increasing pavement capacity to meet targets are needed and careful consideration should be given to design and safety where cyclists and pedestrians are sharing space (expect pedestrians to be on their mobile phones searching for bus information).</i></p> <p><i>Is there any evidence for the number of accidents in 2017 and a target of at least 80% should be set.</i></p> <p><i>No consideration appears to have been given to the mobility needs of older people, those with health problems, pregnant women and those who are carrying heavy loads, who are not necessarily disabled but who on the other hand are not in a position to walk longer distances. In parts of Outer London, pavements are non-existent rendering walking along roads dangerous.</i></p> <p><i>Signage - Given the emphasis that is given to increase in walking it is disappointing that no mention is made of the use of pedestrian signage to encourage pedestrian routes (just as cycle routes) which would have the benefit of reducing the exposure of pedestrians to pollution from road traffic and providing a more pleasant ambience for walkers. For example suitable pedestrian routes could be shown on the TfL website.</i></p> <p><i>Topography as well as the listed Indicators such as ease of crossing roads, level of pollution and so on will have local impacts on suitability and delivery of Healthy Street.</i></p>
Policy T2 Healthy Streets	<p>Object</p> <p><i>Regrettably bus connectivity has been extremely adversely affected by the changes made <b>recently in London's traffic flows through the removal of gyratory systems</b> . In Highgate's case, this has been particularly noticeable at Archway, especially causing difficulties for people with protected characteristics. Lessons should be learnt, approaches revised and mistakes acknowledged and rectified in line with the Mayor's philosophy, especially as by 2041, <b>"London's transport networks will need to cater for over five million additional trips every day (10.3.2)"</b></i></p> <p><i>A very serious omission is the lack of any policy to protect the further decline in the average speed of buses. There are many policies to restrict car usage on public roads in order to benefit cyclists and pedestrians and our concerns at the Archway are indicative of the lack of attention paid to the interests of bus passengers. There was a time when their interest was reflected in the introduction of bus lanes. Why is there no mention of these or of bus only roads in the plan? We see no reason why we should not have dedicated bus routes just as we have dedicated cycle paths which would serve a much higher percentage of the population.</i></p>
Policy T3 Transport capacity, connectivity and safeguarding:	<p>Object</p> <p><i>As the North London Overground shows there is considerable demand for orbital public transport and in Highgate, we believe that routes 210 and 102 have seen faster growth of passengers than 43 and 134 which are radial. This was in a former plan if we recall correctly. If we are correct, this omission should be rectified. Other orbital routes in and around Highgate should be considered as these journeys are particularly difficult.</i></p>
Home and office deliveries :	<p>Comment</p> <p><i>Given their contribution to increases in traffic we find it disappointing that so little mention is given to policies which might address the increased traffic flow from internet shopping.</i></p>

	<i>Please note this increase has a parallel and negative impact on town centres as the Society's comments in Chapter 2.</i>
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# Highgate Society comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

I am chair of the Highgate Society's Planning Committee and have collated and submitted the Society's response to the New London Plan. The Highgate Society is one of London's most active amenity societies and the Society's response to the new Plan has been collated into a 14 page document but unfortunately, this is a stand alone document which has not been split into individual chapters. We have therefore emailed it directly to [LondonPlan@london.gov.uk](mailto:LondonPlan@london.gov.uk). If this would splitting this document would make the assessment task easier, we are happy to do this but could you let us know.

Thank you

Elsbeth Clements

for and on behalf of the Highgate Society

Page: [Introducing the Plan](#)

Section: [N/A](#)

Comment

*Other than a brief mention in 0.0.9 in the introduction, there is no mention of Neighbourhood Planning and the impact this will have on the planning system of which it is now a formal part, and of particular importance in achieving community engagement in the Planning of London's environment.*

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [N/A](#)

#### Object

*This section rests on the assumption that London's recent economic growth will continue at its present level; however the impact of Brexit may well alter the picture, and the continuing impact of immigration must also be considered. Thus any long-term planning for growth must therefore be flexible to address possible changes from the current situation.*

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [N/A](#)

The new draft plan is welcomed in principle but we feel it falls short in a number of areas. The first and most important is the continuing belief in growth. 130,000 EU nationals left the country last year and inward investment in property from the Far East and Russia has all but stopped. Whilst it is hoped that London will continue to grow sustainably, there appears to have been no analysis of the impact of Brexit on London and the possibility that the economy and population of London may remain static, if not shrink.

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

GG1(D) - Comment:

*This Policy calls for the promotion of the role of town centres in improving the social, civic and economic lives of Londoners, both during the day and in the evening which is welcomed. What is not said is how this can be achieved. There are two major threats to sustainable communities in London – the competition from “out of town” shopping centres and the growth of internet shopping. Even in London there is a dominance of “out of town” shopping centres with free parking, which suck business out of the town centres, where parking is often heavily restricted . However the appearance in recent years of small branches of the major supermarkets shows that, given the choice, Londoners would willingly shop in their local high street.*

*The second issue of internet shopping does not seem to have been addressed. Not only is it destructive of town centres but additionally creates additional traffic through deliveries.*

*with added congestion and pollution GG1 (F) Support*

*This is welcomed but is caveated by the response to GG2E below*

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

GG2 (E ) – Object

*This issue ought to be much more nuanced. It is simplistic to conclude that transport by car is bad per se and should be reduced to 20% of all journeys. Walking, cycling and public transport at present levels is not always suitable for the elderly, those in poor health or disabled, for transporting goods or for heavily pregnant women. In addition in outer London and particularly for orbital travel, public transport is simply not available. In Highgate, we have excellent north south connectivity but are poorly connected east-west despite many years of lobbying TfL to address this. Access to Haringey Town Hall requires a journey into Kings Cross and out again or 3 very slow buses.*

*It is conceivable that the development of electric or other non-petrol vehicles will lessen environmental problems associated with motorcars. If car dependency is to be discouraged in the short term the concept of public transport must be reconsidered. The main focus must be on the convenience of the public consumers of the service.*

*Other than convenience, there is also the factor of cost. The cost of rail travel relative to income is greater than in other European countries. London cannot possibly house all those who work here, and no increase in housing stock is likely to solve this problem.*

*Planning new developments to reduce car dependency is called for on health grounds. Even now many developments have very restricted car parking spaces. However this will improve the life of Londoners only if the available public transport is convenient and affordable.*

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [N/A](#)

#### Support and Object

*The principle of this is agreed and welcomed.*

*However, there is little to ensure that permission for residential use will be built for sale or rent on the open market at prices Londoners can afford. Too many luxury flats have been developed which remain empty and do not address the housing crisis in London.*

#### GG4 (B) Strongly Object

*The strategic target of 50% affordable housing is unrealistic without measures to ensure that this can be delivered. Currently there is a reliance on developers to deliver housing. Discussions the Society has had with those involved in the provision of housing have suggested that anything higher than 25% is not viable for developers and that they will simply not build. Affordable housing needs to be built by dedicated provider such as Councils, and properly funded.*

#### GG4 (E) Support and comment

*Too often, sites gain planning with high quality design which are then “value engineered” at construction stage to considerably reduce the design quality. Measures should be taken to ensure quality design obtained at planning is carried through to completion*

Page: [Policy GG5 Growing a good economy](#)

Section: [N/A](#)

#### GG5(D) Object

*As in the Society’s response to GG2 above, new housing has to include houses and flats at prices that Londoners can afford to buy or rent on the open market as well as a proportion of “affordable”. Too many developments are aimed at the luxury market but there is nothing in the Planning System to legislate for sale prices that ordinary Londoners can afford*

*In addition, too many large schemes have been completed with inadequate infrastructure. Funding for this needs addressing.*

#### GG5(F) Support and comment

*The Society feels that Heritage Assets are inadequately protected in London. Statutory listing does offer protection, but in Highgate's case, the Conservation Areas have been woefully degraded in recent years through local authority decisions, or Appeal decisions. Local Councils are remarkably resistant to the application of Article 4 directions, which would protect these, citing lack of resources*

Page: [Policy SD6 Town centres](#)

Section: [N/A](#)

### **SD6(A2) Object**

*This policy seeks to achieve its aim through "high density renewal". Whilst this does not apply to all of London's town centres, others such as Highgate, Hampstead or Barnet have a historic core and this has been part of their attraction, both in terms of a liveable environment and attracting people and businesses. The Plan must make clear that "high density renewal" must take account of, and be sensitive to, London's unique and irreplaceable heritage and Conservation Areas.*

*The plan calls for tourist infrastructure, attractions and hotels in town centre locations, but clearly many town centres do not have land available for such uses.*

### **SD6(H) Comment**

*This calls for the delivery of barrier-free and inclusive town centres, meeting the needs of all Londoners including the elderly, the disabled and families with young children. Interestingly, public toilets are suggested, as are (elsewhere in the plan) public benches and drinking fountains. The points about access, improved public transport and parking for cars (as mentioned above) could be applied here.*

Page: [Policy SD9 Town centres: Local partnerships and implementation](#)

Section: [N/A](#)

SD9 (C) Support and comment:

*This is welcomed. The application of PD Rights from B1 to C3 has resulted in a large number of substandard and non compliant dwellings, whilst having a negative impact on employment and the viability of shopping centres. However, boroughs need the resources to set up Article 4 Directives. In the Society's experience, lack of resources is cited as a reason for not proceeding with Article 4 Directives.*

Page: [Policy D1 London's form and characteristics](#)

Section: [N/A](#)

Support and object

*The intentions are very good, but this policy is too general and seemingly not linked to any standards or actual size/detailing/process requirements. The below points require not only a good architect/planner, but also very capable people in the councils and clients that are ambitions on behalf of design. Since design is also a major concern for local communities, early pre-application consultation with communities is essential and must be required in the Plan. Very little of the below is measurable, and it will therefore be up to the developer and the case officer to determine what "good design" is since this is all too often a subjective decision, based more on resources and development profits than on appropriateness for the setting, this makes early community engagement all the more important.*

D1B(1) Object

*This policy directly contradicts D6 tall buildings. We cannot see how tall buildings can deliver building that are of scale. Too often these are placed in localities adjacent to rows of 2 and 3 storey housing or adjacent to open spaces. It is also difficult to see how a tall building can respond to street hierarchy*

D1B (2) Support and Comment

*This is supported but the problem which exists is how it will be achieved for the whole process. Hopefully D2H will resolve this*

D1B (4) Object

*The policy covering the “respect, enhance and utilise” Heritage Assets needs strengthening to “preserve” heritage assets*

Page: [Policy D2 Delivering good design](#)

Section: [N/A](#)

D2 Support

*This policy is generally supported with the following caveats..*

*The Boroughs are being asked to prepare new development plans according to the points set out in D1 to determine capacity for growth. It is also unclear who will prepare the masterplans and design codes bearing in mind the resources and skill shortages in planning departments. This task must not be taken over by private sector since it takes decisions out of local hands, and may well give rise to a conflict of interest since may private sector consultants may be handling other projects for the same applicants.*

D2A (7) Support

*As in the response to GG2 the Society feels that the heritage assets are inadequately protected in London. There must be a policy to “protect” heritage assets..*

D2F and D2G Support and Comment

*The importance of design reviews is welcomed but this policy falls well short of ensuring it happens on any but the most extreme developments. Only projects referable to the Mayor and optimising density or falling into the category of tall buildings must undergo design scrutiny/design reviews. This excludes a whole raft of other development*

*There should be a greater obligation to use design review panels written into the plan. The Design Review comments should be made public i.e. on the planning website, and in timely manner so that public and other interested parties such as the Victorian Society can comment if they so wish*

D2H Strongly support

*This is welcome. Too many schemes change architect after planning is gained with a high quality design architect being supplanted by the developer’s own production drawing firm, with very often, heavy cost cutting as well a loss of detail. Some built schemes are unrecognisable from that which has gained planning approval.*

Page: [Policy D4 Housing quality and standards](#)

Section: [N/A](#)

Support and comment

*The attempt to add quantitative measures to ensure housing quality is supported as development cannot be judged holistically on "quality" alone. However, this policy seems to replicate the existing situation and including space standards as set down in table 3.1 and therefore the Society has no further comments on this except to question how*

*the challenges will be met as under D1 and D2 . Even if the space standards and ceiling heights are met, many councils no longer have sufficient conservation and design resources to judge the design objectively.*

Page: [Policy D6 Optimising housing density](#)

Section: [N/A](#)

#### Object and comment

*This section states that any development that does not optimise site density should be refused. In section D5, where the extremely small minimum space standards are set out, it says that developers will be encouraged to exceed these standards. This appears to be a contradiction. In addition, it is completely counter to Principles of Conservation Area protection and would fatally undermine the ability of a community to secure appropriate development in a Conservation Area. We suggest that it would raise issues of Human Rights to prevent someone who wanted to build a small unit on their land from doing so.*

*Infrastructure capacity should be planned/amended to support proposed new densities. Infrastructure should include facilities such as nurseries, schools, medical centres, corner shops and rubbish bins as well as public transport and parks.*

*If a minor developments will not have to undergo infrastructure assessments, is there a mechanism for assessment the cumulative impact?*

*This section states that any development that does not optimise site density should be refused. In section D3, where the extremely small) minimum space standards are set out, it says that developers will be encouraged to exceed these standards. This appears to be a contradiction.*

*Infrastructure capacity should be planned/amended to support proposed new densities. Infrastructure should include facilities such as nurseries, schools, medical centres, corner shops and rubbish bins as well as public transport and parks..*

*If a minor developments will not have to undergo infrastructure assessments, is there a mechanism for assessment the cumulative impact?*

D6D – Support

*An assessment of density based on habitable rooms, bedspaces and bedrooms is welcome. A unit based density calculation does not accurately give an assessment of the number of people living on the development. For instance a site with a majority of 1 and 2 bed units will have considerably fewer demands on infrastructure and amenity than of with a majority of 3 and 4 bedrooms.*

D6E Comment

*This policy requests various measures of density be provided but offer no prescriptive targets so it is not clear how this information will be assessed. It appears to be a data collection mechanism.*

Page: [Policy D8 Tall buildings](#)

Section: [N/A](#)

Strongly object

*The introduction claims that tall buildings are justified on the basis of accommodating expected growth and that they support legibility. The first of these comments is addressed elsewhere but the second statement is nonsense. Although the exceptional high building such as the Shard is a landmark, the conglomerations of high buildings such as those at Nine Elms are just the opposite. There are a substantial numbers of Londoners who strongly oppose the construction of the 460 odd new towers either built or with permission and which they see as permanently damaging the unique character of London and to justify these eyesores on the basis of improved legibility is insulting to those people. This statement should be removed.*

D82 (B) Part support, part strongly object

*The Society recognises that there is a place for tall buildings in economic hubs such as Canary Wharf where the layout is carefully planned. What the Society does not agree with is that the provision of tall buildings helps to meet the housing requirements. There are two major problems with this approach. The first is that of the towers already built, the majority of these are luxury flats selling in the £500,000 - £1,000,000 bracket. These are simply out of the reach of the majority of Londoners seeking homes to buy, and due to the halting of overseas investment in these, a substantial number remain empty or unsold. The second is the suitability of tall buildings for new homes. In the 70's, the GLC and other London Boroughs abandoned their policy of building tall buildings to house families and social housing and it is shocking to see this policy again accepted, particularly after Grenfell Tower. There are many other forms of building which meets the needs of housing Londoners including mid rise and terraces. Exemplars such as the late Victorian mansion blocks and Camden's Alexandra Road show high density can be achieved without high rise.*

D8C Support and object

*Whilst the principle set down here are welcomed, there is currently a lack of a strategic approach on the impact of tall buildings on London and a failure to acknowledge the negative impact tall building can have not only on the immediate neighbourhood in which they are located, but also way beyond borough boundaries. Effective urban planning which looks at the impact of conglomerations of tower blocks needs to be addressed. Too often tower blocks are each approved on their individual basis without looking at the relationship with between each other and one just has to look at Stratford High Street between the Town Centre and Bow flyover and Canning Town to see a dystopian vision of the future.*

D8C (e) Object

*It is difficult to see how tall buildings in a World Heritage Site can preserve the Outstanding Universal Values. London should look at the example of Liverpool and ban them in proximity to these Sites.*

D8C (f) Comment

*The buildings on the Thames have already contributed to a canyon effect on the river and the majority of approval awaiting construction are in this location. Can the GLA prevent this?*

Page: [Policy D9 Basement development](#)

Section: [N/A](#)

D9(A) Support and object

*The policy on basement development focuses on large scale basement development (defined as multi-storey and /or those that extend significantly beyond the existing footprint of the building) rather than small scale basement development (not defined but presumably single storey and within existing footprint of a smaller building). Small scale basement development is what affects most adjoining property owners in London. It has caused major problems in Highgate, an area of complex geology and hydrography, and in an extreme case an adjoining house experienced major subsidence.*

*This policy offers no further protection for small scale basement development whilst saying that these developments will be covered by the planning process but only within a Conservation Area or if an Article 4 direction has been made. Additionally it does not address the different types of housing stock in London from Victorian terraces and large stand alone mansions.*

*Whilst the Society welcomes that basements in a Conservation Area/Article 4 Directive as exempt from PD rights, our experience, and that of communities across London, makes it clear that this exemption must apply to all basements.*

*The Policy refers particularly to Inner London. However, experience make it abundantly clear that the impact of basements developments on neighbours is equally severe in all Boroughs. Differentiating on such an issue merely on grounds of whether it is in inner or outer London is illogical and there must be no differentiation.*

*This policy could therefore be read as giving the go-ahead to small scale basement development in London.. As detailed above, this is completely unjustifiable. Basement development is not only a predominantly inner London problem, but a London-wide problem. The policy as currently proposed will not address, but will exacerbate, the situation. This would not be a good outcome*

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

#### Object

*There is undoubtedly a shortage of affordable housing, but the rush to build housing when there are 400,000 unimplemented planning applications in the country with over 250,000 of them in Greater London and 27,000 unsold flats in London suggests that the problem is significantly more complex than this Policy acknowledges. There is something broken in a system which cannot provide housing that is affordable to buy or rent for those who make London a vibrant city. The Society believes this relates to the method of procurement rather than to a shortage and that targets as set down in table 4.1 are crude, damaging to the environment and will prove impossible to implement*

*Whilst the plan does refer to infrastructure in other sections it is not clear*

*how this will be implemented. The general view is that much of this has been said before and if the Mayor does intend to address the housing problems, the plan needs a robust implementation of policy focused on affordability, including in the market sector, and supported by resources*

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

#### Support and Object

*The principle of developing small sites is welcomed with reservations. However there are major problems in that current procurement procedures make it almost impossible for smaller developers to work in the public sector, because framework agreements and the pre qualification questionnaires have a default position which automatically cuts out the smaller suppliers. This will result in the same large scheme developers (eg. Carillion etc), delivering on small sites which will not result in the diversity as set down in Policy in H2A.2*

Page: [Policy H5 Delivering affordable housing](#)

Section: [N/A](#)

#### H5A.5 - Object

*Strategic partners should deliver at least 60% affordable housing and more for the first 5 years. The number of affordable homes built each year reduced from 2010 at 36,700 to 1,102 in 2016/17. However, this will require public funding, as in our responses to Policy GG4 (B) above.*

Page: [Policy H7 Affordable housing tenure](#)

Section: [N/A](#)

#### Object

*An “affordable” rent in London is taken at 70-80% of market value. This is patently discriminatory against the majority of key workers Rents in high value areas like Highgate, and possibly over most of London, are still not “affordable” even with this reduced percentage.*

*The balance/loss of rented accommodation through RTB over the years should be addressed.*

Page: [Policy H12 Housing size mix](#)

Section: [N/A](#)

#### H12 (B) - Object

*We strongly contest the argument that the largest category of homes needed are for one bedroom units, and consider that the proportion of these should be should be restricted to a max. of 40% . They are not sustainable and are discriminatory against even small family units.*

#### H12D - Object

*Size of units- The UK has had one of lowest space standards in Europe since Parker Morris Standards were abolished. New standards need to be establishes to get away from the grossly substandard units commonly being built They should have suggested layouts and allow growing families to adapt the space to their changing needs.*

Page: [Policy S6 Public toilets](#)

Section: [N/A](#)

Support and comment

*We have reviewed this policy in relation to public toilets and would strongly support all of the points. We would particularly support the importance of good public toilet provision to allow shops and local businesses to be as accessible as possible.*

*Over the last years the Highgate Society has worked closely with Camden Council to find a viable way for existing public toilet facilities in the Camden borough to be kept open. We would recommend that the aim of supporting London councils to retain existing public toilet facilities wherever possible is added to this policy*

Page: [Chapter 7 Heritage and Culture](#)

Section: [N/A](#)

*In general, the Society finds the policies in this section encouraging. There are some issues, which have been highlighted below, plus positive aspects that will be beneficial, as long as they are adhered to.*

*However, one clear thing underlines this, which is that in several clauses, it is necessary to re-word the policies so that Conservation Areas are clearly included among, and also designated, as 'Heritage Assets'. As a general point the assumption is made throughout the chapter that Heritage Assets are buildings of some kind. This assumption is incorrect. National legislation and guidance is very clear that Conservation Areas are Heritage Assets in themselves*

HC1(A) -Support

*This is a good and strong statement with clear heritage-led objective.*

HC1(B.2) - Object

*This is a clear directive, but the Society has seen little evidence that the two major boroughs with which it deals have dealt effectively with this, where the fundamental issue is one of implementation and enforcement. To strengthen this, it is suggested that the following is added “The cumulative effect of incremental change from development on Heritage Assets, particularly Conservation Areas.....”*

HC1(B.3)- Object

*This Policy is somewhat contradictory and potentially allows for poor handling of heritage/conservation areas under the aegis of “innovation” and “creativity.”. In our view it would be better to delete and let HC1(C) stand alone, since it states the same aim and intention more unambiguously. However, if it determined to retain it, its sense could be made clear by starting the paragraph: “Where regeneration or new development within Heritage Assets is necessary and appropriate, the purpose must be to integrate the conservation and enhancement...”*

HC1(A) -Support

*This is a good and strong statement with clear heritage-led objective.*

HC1.B2 - Object

*This is a clear directive, but the Society has seen little evidence that the two major boroughs have dealt effectively with this so the question is one of implementation and enforcement. To strengthen this, it is suggested that the following is added . “The cumulative effect of incremental change from development on heritage assets , particularly conservation areas.....”*

HC1(B.3)- Object

*This Policy is somewhat contradictory and potentially allows for poor handling of heritage/conservation areas under the aegis of “innovation” and “creativity.”*

HC1 (C) Support

*This is a good clear and unambiguous statement which identifies both the relevance of the heritage asset as important, and the importance of managing incremental or cumulative change. This is something which has proved a particular problem in the Bishops sub-area of Highgate, and we would expect to see Conservation Area policy specifically mentioned as covered by the remit of this policy..*

HC1(E) Support

*This policy addresses assets “at risk” and gives good, clear direction to Boroughs not to ignore. This will be helpful where Conservation Areas, or any part of them, are identified as suffering from over-development or poor design*

*Para C mentions ‘developments affecting heritage assets; again, Conservation Areas need a specific reference. Therefore add “where “heritage assets including Conservation Areas have been identified etc...”*

Page: [Policy HC3 Strategic and Local Views](#)

Section: [N/A](#)

Support and comment

*This policy vests too much discretionary power with the Mayor alone, in identifying significant views. It will be better to state that this task must be done in collaboration with local authorities and relevant local groups including amenity societies, CAACs and Neighbourhood Forums. Apart from this, we support it as a strong, aspirational policy.*

Page: [Policy HC3 Strategic and Local Views](#)

Section: [Table 7.1](#)

#### Table 7.1 London Panoramas

*In Highgate's case, being a historic hilltop location, visible both from and to Central London, there are number of important additional views which should being added to this table. These include:*

- a view from the top of Waterlow Park overlooking London to the South (one of the few places from which St Pauls can be viewed without the intrusion of tall buildings)*
- Parliament Heath to the east towards the Highgate Ridge including the spires of St Michael's Church and St Anne's' and St Joseph's dome Holly Lodge the Cemetery Athlone House and the whole west facing slope of the Ridge*
- View down Archway Road , under Hornsey Lane Bridge to St. Pauls represents a true gateway to London from the north*
- Upper junction of Southwood Lawn Road and Southwood Avenue giving extensive views over east London to Epping Forest*

*We would also recommend that a number of important, but currently unprotected, views to the Hampstead-Highgate Ridge, which afford Londoners valuable views of a virtually uninterrupted skyline of predominantly trees and greenery, should be designated*

Page: [Policy HC4 London View Management Framework](#)

Section: [N/A](#)

Comment

*The London View Management Framework is good, building on the above policy, but the wording should enable “and require” inter-borough cooperation*

Page: [Policy HC7 Protecting public houses](#)

Section: [N/A](#)

HC7.B – Support and comment

*The presumption on loss of pubs should read that reasons for refusal should not comprise those where it can be proven that they have “heritage, cultural, economic and social value.” Indeed, all will have one or more of these attributes. Some boroughs, such as Islington, have stringent requirements in terms of proving inability to let, which should be adopted as a London wide policy.*

HC7.C

*Development that compromises the operation or viability of a pub “is not to be approved,” (not the weaker, “should be resisted”). The Highgate Society has experience of proposals aimed at securing closure of a pub to achieve more valuable “luxury” housing by reducing their size until they become unviable*

Page: [Chapter 8 Green Infrastructure and Natural Environment](#)

Section: [N/A](#)

Object

*There is nothing in these policies that mentions gardens or backlands development. This is something which is essential to retain in Conservation Areas, where the character of the area is determined not just by the individual buildings but also their setting. London has a uniquely landscaped setting which makes it attractive as a world city and this should be preserved..*

Page: [Policy G1 Green infrastructure](#)

Section: [N/A](#)

G1.C - Comment

*The recommended Development Plans and Frameworks should be devised in consultation with relevant local bodies and groups, e.g. the owners of major public open spaces, the Hampstead Heath and Highgate Wood Consultative Committees, the Friends of London Parks and individual Park's friends groups.*

Page: [Policy G2 London's Green Belt](#)

Section: [N/A](#)

#### G2A - Object

*While we strongly support the Mayor's commitment to support "the continued protection of London's Green Belt", the wording should be strengthened and clarified, to state that the Green Belt should be protected "from development," thus removing the word "inappropriate." Leaving that word in allows for a lot of debate and subjectivity over what is or is not inappropriate, and inevitably will lead to loss of Green Belt.*

#### G2A.1 /G2A.2 - Comment

*These sub-points contradict on another by first stating that harmful development should be refused, while recommending "enhancement... to provide appropriate multi-functional uses." Appropriate needs a closer definition to avoid unacceptable developments being approved through ambiguity and misunderstanding*

Page: [Policy G3 Metropolitan Open Land](#)

Section: [N/A](#)

#### G3A - Object

*As for G2, the two sub-points are contractory and lack definition. "Harmful development", "range of uses" and "partners" need definition*

#### G3C – Object

*The words “Neighbourhood Plan process” should be added here. It is worrying that the Mayor is, apart from 0.0.9, silent on Neighbourhood Plans in this document.*

*In addition, since Metropolitan Open Land is the urban equivalent of, and has the same status as, Green Belt, the same considerations should apply to MOL as to Green Belt. Any other approach will risk undermining the status of MOL and diminishing the ability of Local Authorities and communities to protect their MOL.*

Page: [Policy G4 Local green and open space](#)

Section: [N/A](#)

G4D - Object

*This should be stronger and not restricted to loss of green space in “areas of deficiency.” Loss of green space in other areas will obviously turn them into areas of deficiency. This would result in a weakening of the Ecological Green Corridors (identified in Policy G6B(1) as assets needing identification and protection) on which the viability of major and minor open spaces depend, so all loss should be resisted*

Page: [Policy G5 Urban greening](#)

Section: [N/A](#)

G5A - Object

*The wording in this policy should be strengthened to state that major development proposals “must” contribute to the greening, not just “should. The “high quality landscaping” mentioned should “require” tree planning, not just “include” it as an option. A developer’s responsibility should also extend to the areas adjacent to the large development ensuring that street trees are retained or replaced. . And, once again, the definition of “high quality” must not be left to pre-application discussions between Planners and Developers; the views and expertise of affected local communities and Design Forums must also be required as a part of the planning process.*

#### G5B - Object

*The target UGF (Urban Greening Factor) for development seems too low mentioning only grassy areas, green roof, permeable paving... There are options to include drainage, flora, etc. and these should be the targets, so the aim is to perform at an optimal level, not the bare minimum.*

*It is also unclear what is meant by “tailored to local circumstances”. Does it mean that if there is a lot of open space in an area, then the developer must provide a commensurate amount of urban greening, or is less necessary than in an area of open space deficiency?*

*Indeed, the differential for residential and commercial developments seems completely mistaken. Residential developments are required in any case to incorporate amenity open space and gardens, while commercial developments will endeavour to maximise economic aspects by minimising the amount of greening. In particular, the redevelopment of a fully-developed commercial estate should be used as the opportunity to introduce a higher Urban Greening Factor than existed previously.*

Page: [Policy G6 Biodiversity and access to nature](#)

Section: [N/A](#)

#### G6A - Object

*Strengthen wording to insist SINC's "must" be protected, and remove scaling of proposed protection so that all sites benefit, not just those deemed most significant.*

#### G6B .1 Comment

*On identifying SINC's or Sites of Metropolitan Importance, Boroughs "will be required to consult not just London Wildlife Sites Board, but also other relevant organisations, particularly those with local knowledge and experience" and especially those responsible for the management of ecological spaces, such as the City of London, the Royal Parks, etc., as well as relevant community groups.*

#### G6C Comment

*Where harm is unavoidable to a SINC, the mitigating procedures that are outlined "must" apply, not just the vaguely aspirational "should" apply*

#### G6C.1 Comment

*"Avoid adverse impact ..."* This is the first mitigating procedure where harm is unavoidable – if there is harm, there is adverse impact. This should be re-worded to say: *"There should be no adverse impact..."*

#### G6E – Support and comment:

*This is for new proposed sites, and this should be encouraged. New green habitats should be approved by strict tests set by outside expert bodies, not just the council involved and certainly not solely on the word of the developer.*

*However, "should be considered positively" is, in effect, meaningless in a planning context and will be ignored. This should be replaced with "should be given preference, and adequate provision of such habitats should be required where they are not a part of a development proposal."*

## Support

*The Society strongly supports a robust tree policy but feels that the policy could be strengthened as below:*

### .G7B - Comment

*Strengthen wording so that Local Plans “must” protect trees and provide opportunities of planting. On the protection of veteran trees and ancient woodland, the Plan could be interpreted as contradicting itself by stating that this does not apply where these are already part of a protected site. As Highgate has regularly experienced, group protection of trees within a whole area is not strong enough to prevent individual trees being felled, as planning officers often don’t consider such an action as having much of a negative effect.*

### G7(B).1 - Object

*On the protection of veteran trees and ancient woodland the Plan does not apply where these are already part of a protected site. As Highgate has seen, over-arching protection of a whole area is not strong enough to prevent individual trees being felled, as planning officers often don’t consider such an action as having much of a negative effect.*

### G7C – Support and Object

*We strongly support the statement that replacement trees should reflect the “existing value of the benefits of the trees removed.” This could help ensure that if a large oak were removed to facilitate a development, it would not be acceptable to claim the planting of a box hedge was suitable compensation. Existing trees of “quality” is a dangerously vague phrase. In our experience, arboricultural reports will frequently endeavour to justify the removal of trees or their severe pruning to facilitate development by denigrating them as of “low quality”, in the knowledge that planning officers rarely have the skills to confirm this. There should be a requirement for independent verification of this. In addition, a young tree, particularly if self-seeded, may well grow to be the “quality” tree of tomorrow. We strongly urge the deletion of the words “of quality.”*

Page: [Policy G8 Food growing](#)

Section: [N/A](#)

#### Support and Comment

*We are pleased to see a commitment to protecting allotments and encouraging greater local food production, and suggest that a clause be added, either here or to the Policy on Green Belt, to the effect that the use of Green Belt Land for food production, of a type which does not adversely impact on its open and green character, will be actively encouraged.*

Page: [Policy SI1 Improving air quality](#)

Section: [N/A](#)

#### SI 1 Support

*The principles of SI1 to ensure that new developments should not adversely affect air quality, either during construction, or for residents after they move in is supported. Additionally LETI requests the adoption of a kWh/m<sup>2</sup> metric rather than a Part L comparison and requests the calculation of unregulated energy/CO<sub>2</sub> as well as regulated.*

*LETI also makes suggestions about Borough SPGs and GLA assistance on compilation.*

#### *SI 1 A 4) Comment.*

*During the construction phase there should be monitoring and spot inspections of the air quality at each construction site – independent, but paid for by the developer, with power to halt work when infringements are discovered to prevent localised exposure.*

SI 1 A 6) Comment.

*No statements that air quality cannot be achieved should be accepted until an air quality professional, independent but paid for by the developers has reported*

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [N/A](#)

Comment

*We support the work conducted by the London Energy Transformation Initiative (LETI) that is based on the experience and knowledge of top building professionals from London and across the world, and included in our submission where indicated. The full recommendations are available from the LETI London Plan recommendation report*

*[https://docs.wixstatic.com/ugd/252d09\\_b693dc7f0eba49cda769ca6d0ab70df0.pdf](https://docs.wixstatic.com/ugd/252d09_b693dc7f0eba49cda769ca6d0ab70df0.pdf) and noted by 'LETI' where their work is used. SI 2 general comment. we urge the use of LETI wording for 9.2.9, 9.2.10 g, 9.2.10 h, 9.2.10 l and 9.2.10 k.*

SI 2A. Comment:

*We urge the use of LETI wording to bring forward zero carbon emissions to 2030 and to add the requirement 'be seen' for post build monitoring and verification.*

SI 2B. Comment:

*We urge the use of LETI wording*

SI 2C. Comment:

*We urge the use of LETI wording*

SI 2E. Comment:

*We urge the use of LETI addition re a nationally recognised carbon lifecycle assessment. As well as the LETI recommendations we would want all proposals to demolish a building to include submitted calculations showing CO<sub>2</sub> emissions for one scenario for the new development, including the demolition of the existing building, and a second scenario for refurbishment of the building. It will be in terms of Global Warming Potential (as specified in EN 15804) i.e. in 'kg CO<sub>2</sub> equivalent.' Where kg CO<sub>2</sub> equivalent is significantly higher for the demolition scenario the application should be refused, unless there are more significant advantages*

Page: [Policy SI3 Energy Infrastructure](#)

Section: [N/A](#)

Comment:

*We urge the use of LETI wording for 1) a-d regarding Heat Network proposals and designs, and suggestions for SPGs on heat networks air quality and affordability aspects.*

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [N/A](#)

Support and Comment,

*Especially the zero waste export from London by 2026. Additionally we would require that every Borough adopts consistent recycling requirements for residents to avoid low recycling rates due to misunderstandings from London's frequently moving population.*

*SI 8 C. Where new waste facilities are in the process of approval or construction they should be considered in light of the targets at 9.7.3. eg 65% recycling composting by 2030 and construction, demolition, excavation 95% recycling by 2020. If a planned waste facility is not designed to maximise recycling eg plastic extraction and for clean energy from waste and anaerobic opportunities then it should be redesigned before proceeding. Green gas maximisation should be designed in before any new capacity is built. See [https://alansenergyblog.files.wordpress.com/2016/07/final-the-green-gas-book\\_96pp\\_v5.pdf](https://alansenergyblog.files.wordpress.com/2016/07/final-the-green-gas-book_96pp_v5.pdf) for the way forward.*

SI8 D. Comment.

*This should also apply to upgrading existing sites.*

SI8 D3) Object

*The target for carbon intensity of electricity produced should be better than 400g of CO<sub>2</sub> carbon intensity floor, especially by removing plastic from the feedstock and being set up to take all forms of suitable waste such as used frying oil, coffee, fatbergs etc. See 'Carbon Intensity' - National Grid December 2017*

Table 1: Carbon intensity factors for each fuel type and interconnector import

Fuel Type	gCO <sub>2</sub> /kWh Carbon Intensity
Biomass	120
Coal	937
Dutch Imports	474
French Imports	53
Gas (Combined Cycle)	394
Gas (Open Cycle)	651
Hydro	0
Irish Imports	458
Nuclear	0
Oil	935
Other	300
Pumped Storage	0
Solar	0
Wind	0

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [9.8.7](#)

SI 8 9.87. Comment

*To enable the regular reviews of capacity to be constructive new waste facilities should be based on a modular design, so that, as waste reduces, they are not oversized, risking incentive to reduce waste.*

Page: [Policy SI14 Waterways - strategic role](#)

Section: [N/A](#)

Comment

A policy should be added to always consider unculverting Londons underground streams where appropriate. Upstream misconnections of sewage should not be used as a reason to leave these assets hidden. Where such culverts contain sewage enforcement should be firm and effective.

Page: [Chapter 10 Transport](#)

Section: [N/A](#)

*This chapter focuses on a number of policies which have established themselves as being politically correct and which would improve the lot of Londoners. However the challenge is other issues that are causing problems, often new ones, which the GLA has been slow to respond to. Some of these involve the internet or satellite navigation which have significant impact on traffic volumes, directions and speeds and have not been met in this document.*

KPI: Modal share

Comment

*Definition of a trip needs clarification. Are walking to a neighbour or your car some distance away defined as trips? How many trips are involved in the various methods of transport i.e. a journey made up of walking, taking a bus and then a tube train.*

*Increasing modal share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041 is an ideal, but it leaves 20% for other forms of transport, which may not be realistic in terms of older people, those with disabilities, pregnant women, poor health and carrying heavy loads as well as areas with poor public transport, particularly Outer London and orbital journeys (see below).*

Page: [Chapter 10 Transport](#)

Section: [N/A](#)

**Home and office deliveries :**

Comment

*Given their contribution to increases in traffic we find it disappointing that so little mention is given to policies which might address the increased traffic flow from internet shopping. Please note this increase has a parallel and negative impact on town centres as the Society's comments in Chapter 2*

Page: [Policy T1 Strategic approach to transport](#)

Section: [N/A](#)

## Comments

*Healthy streets should possibly be renamed 'Healthy and Safe Streets'*

*The capacity for walking is mentioned in the supporting text but targets for increasing pavement capacity to meet targets are needed and careful consideration should be given to design and safety where cyclists and pedestrians are sharing space (expect pedestrians to be on their mobile phones searching for bus information).*

*Is there any evidence for the number of accidents in 2017 and a target of at least 80% should be set.*

*No consideration appears to have been given to the mobility needs of older people, those with health problems, pregnant women and those who are carrying heavy loads, who are not necessarily disabled but who on the other hand are not in a position to walk longer distances. In*

*parts of Outer London, pavements are non-existent rendering walking along roads dangerous.*

*Signage - Given the emphasis that is given to increase in walking it is disappointing that no mention is made of the use of pedestrian signage to encourage pedestrian routes (just as cycle routes) which would have the benefit of reducing the exposure of pedestrians to pollution from road traffic and providing a more pleasant ambience for walkers. For example suitable pedestrian routes could be shown on the TfL website.*

*Topography as well as the listed Indicators such as ease of crossing roads, level of pollution and so on will have local impacts on suitability and delivery of Healthy Street.*

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

## Object

*Regrettably bus connectivity has been extremely adversely affected by the changes made recently in London's traffic flows through the removal of gyratory systems . In Highgate's case, this has been particularly noticeable at Archway, especially causing difficulties for people with protected characteristics. Lessons should be learnt, approaches revised and mistakes acknowledged and rectified in line with the Mayor's philosophy, especially as by 2041, "London's transport networks will need to cater for over five million additional trips every day (10.3.2)"*

*A very serious omission is the lack of any policy to protect the further decline in the average speed of buses. There are many policies to restrict car usage on public roads in order to benefit cyclists and pedestrians and our concerns at the Archway are indicative of the lack of attention paid to the interests of bus passengers. There was a time when their interest was reflected in the introduction of bus lanes. Why is there no mention of these or of bus only roads in the plan? We see no reason why we should not have dedicated bus routes just as we have dedicated cycle paths which would serve a much higher percentage of the population.*

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [N/A](#)

## Object

*As the North London Overground shows there is considerable demand for orbital public transport and in Highgate, we believe that routes 210 and 102 have seen faster growth of passengers than 43 and 134 which are radial. This was in a former plan if we recall correctly. If we are correct, this omission should be rectified. Other orbital routes in and around Highgate should be considered as these journeys are particularly difficult.*

Page: [Annex One Town Centre Network](#)

Section: [Table A1.1](#)

## Table A1.1 *The Plan's Town Centre proposals*

*An examination of the Plan's town centre list shows a division into International town centres, Metropolitan town centres, Major Town Centres and District Town Centres, together with several smaller categories, 239 in all. Centre Index.*

*The Society is concerned that Highgate High Street and Archway Road, both community-based shopping streets, are excluded from this list. Because the Plan sees the London Boroughs as the prime planners and movers in its implementation this puts Highgate in an unfortunate position, with no single borough having overall responsibility for Highgate as a whole. In this respect it is disadvantaged, in comparison with Muswell Hill, East Finchley, Archway, Kentish Town and many other similar areas which are designated coherent District Town Centres which will be monitored and represented by the boroughs in which they are located.*

*Despite the fact that Highgate is divided between two boroughs, Highgate's unique position and interests as a world class heritage site, with valuable green spaces and attraction to other Londoners and to tourists, makes it essential that it is regarded as a distinct area with distinct interests. The Highgate Neighbourhood Plan looks at Highgate holistically and so must the London Plan*

Page: [Multi-policy response](#)

Section: [N/A](#)

Full comments - see attachment