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Submitted to
Highgate Neighbourhood Forum





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HIGHGATE NEIGHBOURHOOD PLAN: STRATEGIC ENVIRONMENTAL ASSESSMENT

ENVIRONMENTAL REPORT: NON-TECHNCIAL SUMMARY

REGULATION 16 UPDATE

August 2016

<i>Project Role</i>	<i>Name</i>	<i>Position</i>	<i>Actions Summary</i>	<i>Signature</i>	<i>Date</i>
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Project Coordinator	Ffion Batcup	Project Coordinator	Reviewed		24 August 2016

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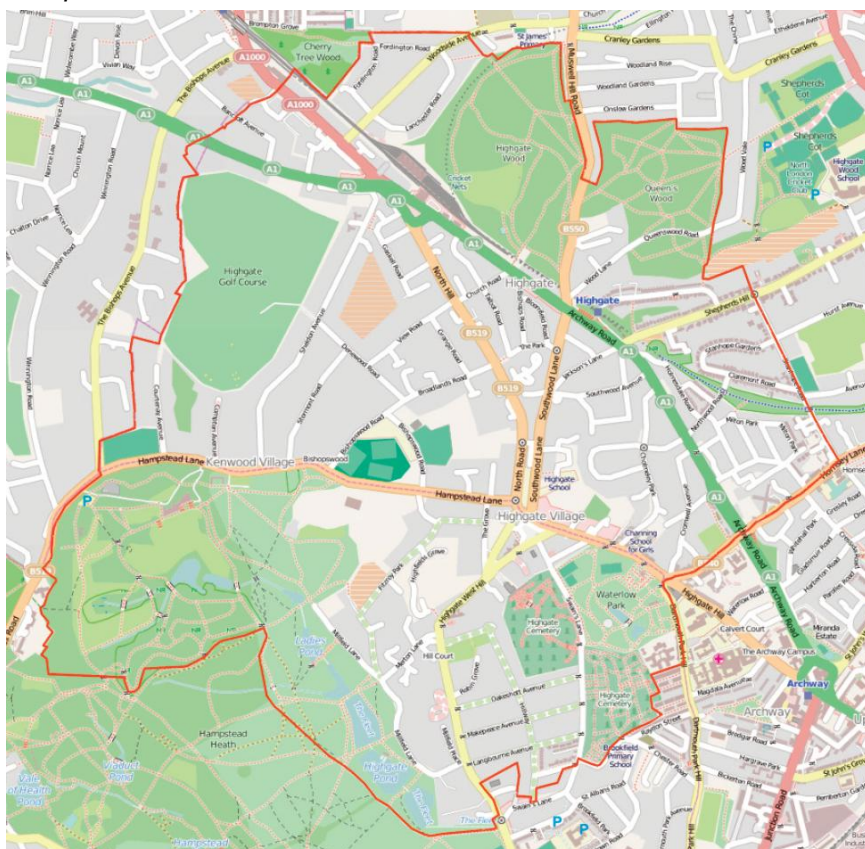
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INTRODUCTION

AECOM is commissioned to undertake a Strategic Environmental Assessment (SEA) in support of the emerging Highgate Neighbourhood Plan, which is being prepared by the Highgate Neighbourhood Forum.

The Plan, once adopted, will establish planning policy for Highgate. Alongside the London Plan and the Local Plans prepared by Camden and Haringey Councils (the Neighbourhood Forum’s area spans two boroughs) it will provide a framework for determining planning applications over the next fifteen years.

The plan area



SEA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives.

This is the **non-technical summary (NTS)** of the updated SEA Report (known as the ‘Environmental Report’) currently published alongside the ‘Pre-submission Draft’ version of the plan.

Structure of the Environmental Report / this NTS

The Environmental Report (and this NTS) essentially sets out to answer three questions:

1. What has plan-making / SEA involved up to this point?
 - In particular, how has assessment of ‘reasonable alternatives’ fed-in?
2. What are the assessment findings and recommendations at this current stage?
 - i.e. what would be the effect of the draft plan as published, were it to be implemented?

3. What are the next steps?

However, before question (1) can be answered, there is a need to 'set the scene' by answering the initial question: *What's the scope of the SEA?*

The National Planning Practice Guidance (paragraph 41) sets out that "*The environmental report will not necessarily have to be amended if the neighbourhood plan is modified following responses to consultation.*" Only where the plan is substantially altered might an update be required. In the case of Highgate, the Plan has not been substantially altered but nonetheless the Environmental Report has been updated to reflect comments received on the second Regulation 14 consultation and changes made to the Plan prior to submission to Haringey Council. Where updates have been made, they are highlighted as ~~strikethrough~~ for deletions and **blue highlights** for additions.

What's the scope of the SEA?

An important first step in the SEA process involves establishing the 'scope', i.e. those issues/objectives that should be a focus of the SEA, and those that should not. For the Highgate Neighbourhood Plan, subsequent to scoping work (including consultation), it was established that the SEA scope is essentially reflected in a list of 12 sustainability objectives, grouped under 8 'topic' headings. Taken together, these sustainability topics and objectives indicate the parameters of SEA, and provide a methodological 'framework' for assessment.

Sustainability topics and objectives (the 'SEA framework')

SEA topic	SEA objectives
Air quality	<ol style="list-style-type: none"> Promote measures to reduce air pollution. Promote sustainable transport use and reduce the need to travel.
Biodiversity	<ol style="list-style-type: none"> Protect, and where possible enhance, all biodiversity and geological features.
Climate change	<ol style="list-style-type: none"> Promote climate change mitigation in Highgate. Support the resilience of Highgate to the potential effects of climate change.
Economy & enterprise	<ol style="list-style-type: none"> Support and maintain a strong and sustainable local economy
Health and well-being	<ol style="list-style-type: none"> Promote the health and well-being amongst local residents.
Historic environment and landscape	<ol style="list-style-type: none"> Protect, maintain and enhance Highgate's cultural heritage resources, including its historic environment and archaeological assets. Protect and enhance the character and quality of landscapes / townscapes.
Population, housing and community	<ol style="list-style-type: none"> Provide a range of types of housing including affordable housing, and a mix of dwelling sizes, types and tenures. Cater for existing and future residents' needs as well as the needs of different groups in the community (e.g. younger persons).

SEA topic	SEA objectives
Transport	12. Promote sustainable transport use and reduce the need to travel, especially using private cars.

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

The Environmental Report explains how reasonable **alternatives** were assessed in relation to two 'headline' plan issues, namely: 1) Economic activity, and specifically the matter of allowing/preventing premises changing use class (e.g. A1 use class is retail; B1 use class is office space; C1 use class is residential) within Highgate Village Core, along Archway Road and at Aylmer Parade; and 2) Open space and public realm, and specifically the policy approach to managing the existing open space at the Hillcrest Estate.

Summary alternatives assessment findings are presented within the two tables below (note that SEA topics not included in the table have been 'scoped out' of the assessment). Within each row of the table - i.e. for each of the relevant SEA topics - the performance of each option is categorised in terms of 'significant effects (using red / green shading) and also ranked in order of preference. Also, at the end of each table is the response of Highgate Neighbourhood Forum to the assessment findings.

Assessment of 'Economic activity' alternatives

Assessment findings

Topic	Option 1: Establish policy specific to each of the three centres	Option 2: Rely on Camden/Haringey Local Plan policy
Air quality	★ 1	2
Climate change	★ 1	2
Economy and enterprise	★ 1	2
Health and wellbeing	★ 1	2
Historic environment and landscape	★ 1	2
Population, housing and community	=	
Transport	★ 1	2

The policies seek to supplement emerging Haringey and Camden policy to a small but notable extent, such that there is additional policy support for maintaining a mix of town centre uses, i.e. supporting retail and employment and restricting residential. For Highgate Village Centre, the policy will also have the effect of tying together Camden and Haringey Policy, ensuring that planning decisions take into account the mix of uses within the centre as a whole (as opposed to the mix of uses within the Camden part or the Haringey part). There are wide ranging community and local economy benefits associated with policy that will maintain the function and vibrancy of centres in the long term, perhaps most notably from a 'health and wellbeing'

Topic	Option 1: Establish policy specific to each of the three centres	Option 2: Rely on Camden/Haringey Local Plan policy
<p>perspective in that those who are less mobile rely on local centres in order to meet their needs. It is also the case that the centres - and most notably Highgate Village Centre - are heritage assets and their heritage significance is tied to their function. However, there is a tension in that from, a 'housing' perspective, it can be argued that a more permissive approach - i.e. one that allows for change of to residential, where it is demonstrated that retail/employment is non-viable - is appropriate.</p> <p>N.B. Significant effects are not predicted, hence there is no red or green shading within the table above.</p>		

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

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

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

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

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

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

Assessment of ‘Open space and public realm’ alternatives

Assessment findings

Topic	Option 1: Designate open land at Hillcrest Housing Estate as Local Green Space	Option 2: Do not designate
Biodiversity	★ 1	2
Health and wellbeing	★ 1	2
Historic environment and landscape	★ 1	2
Population, housing and community	=	

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

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

The Forum does not support any intensification on Hillcrest as it does not recognise any potential sites for development on the estate. Of the sites proposed by Homes for Haringey, two are Sites of Importance for Nature Conservation (SINCs), one provides parking for the estate and is already oversubscribed, and the fourth is a local amenity/children’s play area.

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

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

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

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

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

WHAT ARE THE ASSESSMENT FINDINGS AT THIS CURRENT STAGE?

Under this heading the Environmental Report presents an assessment of the draft plan (under the SEA framework established through scoping). Summary assessment findings are presented here.

Air quality

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

Biodiversity

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

Climate change

In terms of climate change mitigation, there will clearly be secondary benefits resulting from the policy focus on reducing car travel / traffic congestion, and therefore **positive effects**; however, effects will not be significant. It is also noted that there is a tension between the plan's focus on planning in-line with townscape and heritage constraints, and a desire to minimise carbon emissions from the built environment (e.g. through low carbon design measures); however, there is little to suggest that policy will result in well located and designed measures being precluded or overly restricted.

In terms of climate change adaptation, there is a considerable focus on ensuring that basement developments do not lead to long term sustainability problems, as a result of unforeseen impacts to the water regime (recognising that the regime will be altered in the future as a result of climate change). There is much uncertainty, but it could be that the baseline situation is one whereby 'unchecked' basement development directly leads to surface water flooding and/or impacts to water levels at Highgate and Hampstead ponds. On this basis, **significant positive effects** are predicted.

Economy and enterprise

The plan will ensure that the three centres - Highgate Village Core, Archway Road and Aylmer Parade - continue to function over time in the way that they do currently, and hence will likely have **positive effects** on the baseline (i.e. a scenario whereby there is pressure for change of use away from retail and employment uses to residential). To a large extent, beneficial effects will result from the protection of employment uses (offices and workshops, including those suited to SMEs) although the question has been raised whether the plan might go slightly further in this respect (given ambitious London Plan employment growth targets). It is also noted that measures outside the influence of the plan will have a considerable bearing on the mix of uses within the centres, notably Article 4 Directions¹ prepared in conjunction with the Camden and Haringey Councils. On this basis, significant effects are not predicted.

Health and wellbeing

Numerous aspects of the plan are geared towards preventing a situation whereby high land values result in 'over development' and therefore, in the long term, a situation whereby some local residents (e.g. the young and elderly) are faced with barriers to good health and wellbeing. Perhaps most notable is the policy intention to designate 112 areas of local greenspace, some of which might otherwise be at risk of development for housing. It is recognised that 'determinants' of health and wellbeing are numerous; however, on the basis that the baseline situation is one whereby barriers to health and wellbeing worsen through loss of open space, **significant positive effects** are predicted.

Historic environment and landscape

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

Population, housing and community

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

¹ Article 4 Directions remove permitted development rights in a specific geographical area, such that planning permission is required for all new development and any renovations to existing buildings.

Transport

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

Overall conclusions on the Draft Plan

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

WHAT ARE THE NEXT STEPS?

~~Subsequent to the current consultation, which is being undertaken in line with Regulation 14 of the Neighbourhood Planning Regulations, the~~ The Neighbourhood Forum ~~will~~ has finalised the plan and ~~then~~ submitted it to the Borough Councils (in-line with Regulation 15 of the Neighbourhood Planning Regulations). A Consultation Statement will be submitted alongside that describes issues or concerns raised through the current consultation and how these were addressed when finalising the plan for submission.

Subsequently - Regulation 16 requires that the Local Authority 'publicises' the plan so that stakeholders can make representations that may then be considered at Examination; Regulation 17 requires that the Local Authority submits, to the person appointed to carry out the Examination, the plan and a copy of any representations received; Regulations 18 and 19 require that, subsequent to the Examination, the Local Authority publishes the Examiner's Report and a Decision Statement setting out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan.

If the Local Authority is prepared to make the plan, then a referendum can be held; and Regulation 20 states what the Local Authority must do when the plan is 'made', i.e. adopted.

The SEA Statement must be published alongside the adopted plan, with a view to providing certain information, including 'measures decided concerning monitoring'. At the current stage - i.e. in the Environmental Report - there is a need to present 'measures envisaged concerning monitoring'. In light of the assessment findings presented in Part 2 of this Environmental Report ~~report~~, it is suggested that monitoring might focus on - Housing mix; Basement developments; and Employment uses within the three centres.

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