

## Crouch Hill and Hornsey Rise Neighbourhood Area application – summary of consultation responses

Respondent no.	Name of organisation (if applicable)	Summary of comments	Islington Council response
1	Highways England	Highways England are concerned with proposals that have the potential to impact on the safe and efficient operation of the strategic road network (SRN) and, having examined the information available, do not have any comments at this time.	Noted.
2	Marine Management Organisation	No comments, not within MMO remit.	Noted.
3	Natural England	No specific comments on neighbourhood area application; general advice given re: preparation of neighbourhood development plan.	Noted. General advice may form part of any discussions on any future neighbourhood development plan.
4	Office of Rail and Road	No comments, ORR only needs to be consulted if strategic rail issues arise or if plans contain modifications to the rail network or to infrastructure which would directly impact on the rail network. Link to ORR localism guidance provided.	Noted. ORR localism guidance may form part of any discussions on any future neighbourhood development plan.
5	Sky Telecommunications Services Ltd	Confirmed not affected by proposal.	Noted.
6	Sport England	General guidance provided re: reflecting national policy for sport in neighbourhood plans.	Noted. Advice may form part of any discussions on any future neighbourhood development plan.
7	Transport for London	No objection to the establishment of the Neighbourhood Forum in this area. TfL has assets and operations within the area mainly being bus operations. TfL therefore encourages the organisation to contact TfL and the council through the development of their plan in order to assist in the development of policies.	Noted. TfL will be engaged at future stages of Neighbourhood Planning process, e.g. consultation on a Neighbourhood Forum application and any consultation on a draft Neighbourhood Plan.
8	Historic England	Area includes a relatively diverse built environment; north western part of the proposed boundary includes part of the Whitehall Park Conservation Area and appears to overlap with part of the proposed Archway neighbourhood Area. Historic England normally advocates ensuring that neighbourhood area boundaries follow conservation area boundary lines. As such we would recommend that the merits of the proposed boundary are discussed with Islington's Conservation Team.  Encourage future forum to develop clear and robust heritage policies in any neighbourhood plan. Advice given to help identify and describe local character and identify the value and significance of the historic elements of the plan area.	Noted.  Neighbourhood Planning legislation does not prevent conservation areas spanning multiple Neighbourhood Areas; but the council has considered the preferred best practice in discussion with Design and Conservation officers; officers do not have any concerns about the proposed boundary in terms of impacts on the conservation area.  Recommendations re: heritage policies; and general advice may form part of any discussions on any future neighbourhood development plan.
9	Resident	Supportive of proposed area. Area suffers from lack of local identity; respondent believes this proposal will go some way towards helping the area become more like a neighbourhood community.	Support noted.
10	Traders and businesses in proposed Crouch Hill and Hornsey Rise Neighbourhood Area	Support for proposed neighbourhood area. Support production of neighbourhood plan for the area to tackle various perceived issues. Response signed by number of local businesses; further businesses listed without signature.  Statement provided to clarify statutory purposes re: designation of neighbourhood areas. This statement summarises purportedly relevant case law; and highlights a number of reasons why the proposed area should be designated.  Request to be kept informed of progress of neighbourhood area application.	Support noted.  A neighbourhood forum must be designated for any neighbourhood area before a neighbourhood plan can be produced.  The council notes the statement provided to clarify statutory purposes re: designation of neighbourhood areas.  Any decision to designate the proposed Neighbourhood Area will be publicised as per the requirements of the Neighbourhood Planning (General) Regulations 2012 (as amended), section 7; and in line with the council's requirements to publicise decisions on the council website.
11	Resident	Objects to the area application. Considers that the area application cannot be deemed to have been submitted on behalf of the Crouch Hill and Hornsey Rise Neighbourhood Forum.  Consultation on the area application separately goes against accepted practice of consulting on area and forum applications together.  Area application doesn't include a description of the physical characteristics and public facilities within the proposed area; demonstrate a methodology used to determine the boundary; or mention designated open spaces which are in the area.	Objection noted.  The council's preference is for consultation on the Neighbourhood Forum and Area to take place at the same time, but the Neighbourhood Planning regulations simply require that a Neighbourhood Area application be publicised as soon as possible after receipt, regardless of whether a Neighbourhood Forum application has also been submitted.  The regulations for assessing Neighbourhood Area applications only require a statement explaining why this area is considered appropriate to be designated as a

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		<p>Since 2012, when the proposed area boundaries were first discussed, the forum have undertaken further work and it has become apparent that local residents who continue to engage with the Forum no longer consider the boundaries of the area proposed in this application as being an area that they identify as being their local neighbourhood.</p> <p>Part of the justification of the area is that Whitehall Park Conservation Area should lie wholly within the adjacent Archway Neighbourhood Area. This is contradicted by the fact that the Conservation Area does span the two Forum areas. The proposed area includes a small part of the Conservation Area between Sunnyside Road and Hazelville Road.</p> <p>There are no details about who, and which groups, attended the first consultation meeting to discuss the boundaries. There is also no indication of the geographical spread of people across the Neighbourhood Area, or different sections of the local community, among the people who attended that meeting.</p> <p>Suggests that the point of contact and contact details named on the application are incorrect.</p>	<p>neighbourhood area. Therefore, the fact that the area application does not provide a description of the physical characteristics and public facilities within the proposed area; demonstrate a methodology used to determine the boundary; or mention designated open spaces which are in the area; is not considered to be contrary to the regulations. Officers do encourage provision of as much information as possible when feeding back on draft area and forum applications, but we cannot refuse to process applications if some of this information is not included.</p> <p>The national Planning Practice Guidance (PPG) sets out considerations to be taken into account when deciding the boundaries of a neighbourhood area and these do include infrastructure or physical features such as a major road or railway line or waterway; and the existence of formal or informal networks (plural) of community groups.</p> <p>The council can refuse to designate a proposed Neighbourhood Area where they consider that the specified area is not an appropriate area to be designated. Where a proposed neighbourhood area is refused, the council must exercise their power of designation so as to secure that some or all of the specified area forms part of one or more areas designated (or to be designated) as neighbourhood areas. In other words, the council can designate the area as proposed, or designate a reduced area.</p> <p>Respondent mentions further work on proposed boundaries, but no definitive alternatives are put forward. Through discussions with representatives from the emerging Neighbourhood Forum for this area, no alternative boundary to that proposed in February 2014 has been put forward to date (October 2015).</p> <p>The issue regarding the conservation area has been considered (see comments from Historic England and council's response to these comments).</p> <p>There is no requirement for the area application to provide full details of exactly who was involved in the determination of the boundary. The regulations require a statement that the organisation or body making the area application is a relevant body, i.e. an organisation or body which is, or is capable of being, designated as a neighbourhood forum. Such a statement has been provided.</p> <p>The application consulted on did not have any contact details; therefore the respondent may be referring to a different version of the application. It should be noted that, unlike neighbourhood forum applications, a named contact is not required for neighbourhood area applications.</p>
12	Resident	<p>Expresses opposition to Neighbourhood Area application for several reasons.</p> <p>Inadequate and weak justification for proposed boundary, with no evidence that residents perceive themselves as a neighbourhood; and no methodology for determining the area. Application also does not meet some of council's stipulated requirements, e.g. a description of the physical characteristics or public amenities of the area.</p> <p>Estates included in area between Hazelville Road and Hornsey Rise should be excluded from proposed area and included in a separate neighbourhood area with other estates to the west of Hazelville Road.</p> <p>Borough boundary is acceptable as northern boundary of area, but use of railway line as southern boundary does not make sense, as other side of railway does not seem like a different area; no evidence presented of residents living close to either side of this boundary line being consulted on their perceptions.</p>	<p>Objection noted.</p> <p>Regarding inadequate and weak justification, the council's response to respondent 11 above also applies here. The council has no explicit powers to require such information and can only encourage provision; the information provided meets the requirements of the Neighbourhood Planning regulations.</p> <p>It is not clear why the respondent thinks that housing estates should be excluded. It should be noted that the area to the west of Hazelville Road is covered by the emerging Archway Neighbourhood Area.</p> <p>As noted above in the council's response to respondent 11, no alternative boundary to that proposed in February 2014 has been put forward (to date) during discussions with representatives from the emerging Neighbourhood Forum for this area, . Whether infrastructure or physical features define a natural boundary is supported by the PPG as</p>

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		<p>Concern about consultation and engagement undertaken by the group which took place around the time the proposed area was being developed.</p> <p>Respondent claims that application was submitted without agreement of the forum.</p> <p>No accompanying Neighbourhood Forum application submitted.</p>	<p>being a consideration in deciding the boundaries.</p> <p>The comment re: concern about consultation and engagement refers to consultation undertaken by the group, which the council had no involvement in. With regard to the consultation undertaken by the council, residents in the area had the opportunity to comment for a 6 week period, during which time various measures were taken to publicise the application, such as site notices placed around the area to inform residents of the consultation, including on the northern side of the railway bridge on Crouch Hill</p> <p>Re: the concern highlighted about the application being submitted without the agreement of the emerging forum, officers are satisfied that at the time of submission, it was done on behalf of the emerging forum; and with the knowledge of the then-designated chair of the group. Officers are aware of complex group dynamics and disputes between different individuals who have had involvement in the emerging forum. However, it is not the role of the council to mediate disagreements within the group; the council must assess the area application purely in line with regulations.</p> <p>The council's preference is for consultation on the Neighbourhood Forum and Area to take place at the same time, but the Neighbourhood Planning regulations simply require that a Neighbourhood Area application be publicised as soon as possible after receipt, regardless of whether a Neighbourhood Forum application has also been submitted.</p>
13	Environment Agency	Confirmed that there are no environmental constraints under our remit (such as fluvial flood risk, watercourses) that affect the proposed designated area. Link to guidance on neighbourhood planning provided.	Noted. Guidance may be provided to future designated forums and may form part of any discussions on any future neighbourhood development plan.
14	Resident	Application considered out of date and does not represent the subsequent decisions made by the group. It should be summarily rejected.	<p>Objection noted.</p> <p>The council has to determine the application which has been made to it. It should also be noted that through discussions with representatives from the emerging Neighbourhood Forum for this area, no alternative boundary to that proposed in February 2014 has been put forward to date.</p> <p>S61G(5) of the Town and Country Planning Act 1990 provides that if the council refuse to designate the area as proposed, they must exercise their power of designation so as to secure that some or all of the specified area forms part of one or more areas designated (or to be designated) as neighbourhood areas.</p>
15	New Orleans Tenants and Residents Association	<p>Support for proposed neighbourhood area.</p> <p>Support production of neighbourhood plan for the area to tackle various perceived issues.</p> <p>Request to be kept informed of progress of neighbourhood area application.</p>	<p>Support noted.</p> <p>A neighbourhood forum must be designated for any neighbourhood area before a neighbourhood plan can be produced.</p> <p>Any decision to designate the proposed Neighbourhood Area will be publicised as per the requirements of the Neighbourhood Planning (General) Regulations 2012 (as amended), section 7; and in line with the council's requirements to publicise decisions on the council website.</p>
16	Resident	<p>Objects to neighbourhood area for several reasons.</p> <p>Application lacks detail on people who discussed and decided boundaries. No methodology highlighting why area is appropriate.</p> <p>No neighbourhood forum application has been made.</p> <p>Area includes several SINCs but application doesn't mention these; or other important buildings, roads, or facilities, such as schools, public transport, health care.</p>	<p>Objection noted.</p> <p>Regarding the lack of detail on how boundaries were decided and a lack of a methodology, the council's response to respondent 11 above also applies here. The information provided within the area application meets the requirements of the Neighbourhood Planning regulations.</p> <p>The council's preference is for consultation on the Neighbourhood Forum and Area to take place at the same time, but the Neighbourhood Planning regulations simply require</p>

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		<p>Application doesn't seem to make reference to any other residents or local groups who may be active in this area, who could have been consulted on the process of developing a boundary.</p>	<p>that a Neighbourhood Area application be publicised as soon as possible after receipt, regardless of whether a Neighbourhood Forum application has also been submitted.</p> <p>The respondent raises a similar point to respondent 11. The regulations for accepting Neighbourhood Area applications simply require a statement explaining why this area is considered appropriate to be designated as a neighbourhood area. Therefore, the fact that the area application does mention SINC's or other important buildings, roads, or facilities, such as schools, public transport, health care, is not considered to be contrary to the regulations. Officers do encourage provision of as much information as possible when feeding back on draft area and forum applications, but we cannot refuse to process applications if some of this information is not included.</p> <p>The PPG identifies potential considerations which could be taken into account when deciding boundaries (see above). These considerations include infrastructure or physical features such as a major road or railway line or waterway; and the existence of formal or informal networks (plural) of community groups. Such factors may be taken into account in assessing whether the area is appropriate</p> <p>There is no specific required level of engagement which must take place with residents and local groups; the only requirement is for a statement that the organisation or body making the area application is a relevant body. The engagement which has taken place is the responsibility of the group; the council have no involvement in this.</p>
17	Resident	<p>Expresses opposition to Neighbourhood Area application for several reasons. The outlined area does not function as one neighbourhood and there could be a variation of the area.</p> <p>Area changed from 2012 letter of intent to 2014 application, to allow Whitehall Park Conservation Area to be wholly within emerging Archway Neighbourhood Area; however, a small part of the conservation area remains within the proposed Neighbourhood Area.</p> <p>Discussions on what constituted a neighbourhood, held in March 2012, came from a wider geographical spread (including parts of the London Borough of Haringey) than the area subsequently "agreed by consensus" (as stated in the application form). Thus, by definition, views were not fully representative of people living and working in the chosen area. The removal of the Elthorne Estate from the then emerging boundary in 2013 also meant that the views expressed in March 2012 were no longer fully representative. The justification provided in the area application therefore could not give an accurate portrayal of the specific social, economic and environmental needs of the area proposed given the changes that have taken place since March 2012. This is the major methodological flaw of the Forum application, as views from a different geographical and socio-economic area were included.</p> <p>Original letter of intent<sup>1</sup> identified that the neighbourhood related to two main areas – Crouch Hill and Hornsey Rise - did not reflect actual make-up of people and areas from discussions. Letter of intent was rushed through for reasons unknown.</p> <p>Residents from Holly Park, to the east of Crouch Hill, signed the original letter of intent primarily to help resolve an issue re: threats to community facilities; these residents played little part in the forum once this issue is resolved, with only 3 of the 50 total forum residents residing in Holly Park.</p> <p>The area application gives little detail on the area beyond a list of estates contained within</p>	<p>Opposition noted.</p> <p>The respondent mentions a potential variation of the area, and specifically mentions the part of the boundary east of Crouch Hill. However, an explicit alternative boundary is not provided.</p> <p>The respondent takes issue with the inclusion of Holly Park, i.e. the area east of Crouch Hill, within the proposed boundary. The respondent notes that there is no ongoing engagement from Holly Park residents; however, in the council's recent dealings with the emerging Neighbourhood Forum, it has been clear that this area still has some representation. There is no regulatory requirement for a proposed area to be broken down into sub-areas with a requirement for proportionate representation for each. There are other areas within the proposed boundary with less representation than the 3 individuals noted by the respondent; no suggestion is put forward to remove these areas.</p> <p>The only part of the proposed Neighbourhood Area boundary that has changed since the 2012 letter of intent is an amendment to the south-west part of the boundary, which is now along Hazelville Road/Courtauld Road/Fairbridge Estate; this change was primarily to reflect the proposed Neighbourhood Area being developed by the emerging Neighbourhood Forum for Archway.</p> <p>The issue regarding the conservation area has been considered (see comments from Historic England and council's response to these comments).</p> <p>Regarding the lack of detail on how proposed boundaries were decided and a lack of a methodology, the council's response to respondent 11 above also applies here. Officers do encourage provision of as much information as possible when feeding back on draft area and forum applications, but we cannot refuse to process applications if</p>

<sup>1</sup> This letter was submitted by the group to the council early in the process; it subsequently did not form part of the area application.

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		<p>the area. There is no description of the physical characteristics of the proposed area such as the hilly terrain, the types of buildings, the major roads, or of the functioning of different facilities such as schools, health centre, public transport etc.</p> <p>The statement that “Crouch Hill and Hornsey Rise Neighbourhood Forum... is the relevant body capable of being designated as a neighbourhood forum” (under 1. Name) asserts this without any explanation, simply quoting the relevant legislation and accompanying regulations.</p> <p>Work undertaken subsequent to the 2014 area application reinforces the view that those to the east of Crouch Hill relate to a different area with different transport and shopping links (running down to Stroud Green and Finsbury Park). This demonstrates that a potential group exists to take on neighbourhood planning work for local improvement in Hornsey Rise but not across the whole area outlined in this application.</p> <p>Notes that this opposition may cause confusion but believes that active involvement of many residents in an extremely diverse neighbourhood should be the deciding factor for designation, rather than technical planning arguments. Requests that area application is rejected or amended based on changes described.</p> <p>Respondent accepts that refusal will risk further confusion among the residents, workers and businesses of Hornsey Rise and around, but states that the jargon of “planning expertise” cannot substitute for the active involvement of many residents in an extremely diverse neighbourhood. Hopes that boundary can be changed if not rejected outright.</p>	<p>some of this information is not included.</p> <p>Re: the ‘relevant body’ statement, the regulations for assessing Neighbourhood Area applications only require a statement explaining why this area is considered appropriate to be designated as a neighbourhood area. Such a statement has been provided.</p> <p>The council must assess the application which has been made and decide whether the boundary is appropriate. S61G(5) of the Town and Country Planning Act 1990 does not allow the council to reject the application outright. If the council are minded to refuse to designate the area as proposed, they must exercise their power of designation so as to secure that some or all of the specified area forms part of one or more areas designated (or to be designated) as neighbourhood areas. The respondent offers no detailed proposals for an amended boundary for the Neighbourhood Area.</p>