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ALEXANDRA PARK AND PALACE CONSERVATION AREA ADVISORY COMMITTEE

Please reply to:

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Ciara Whelehan
Team Leader Planning Policy
London Borough of Haringey, Planning and Regeneration
639 High Road, Tottenham
N17 8BD

Dear Ciara,

Local Development Framework – Core Strategy

In response to your email of 10 May, I am pleased to send you the following pages that include the APPCAAC's comments on the Core Strategy.

We have limited our comments to those parts of the Core Strategy that have a bearing on Alexandra Park and Palace. We have commented on the Development Management Policies in so far as only those that are referred to in Appendix I of the Core Strategy.

We understand that the DMP volume and the Site Allocations document will be developed further and be the subjects of later and more formal consultation - we will comment more fully on these at that time.

Yours sincerely,

Colin Marr (Chairman APPCAAC)

HARINGEY CORE STRATEGY, May 2010

Comments on the Council's Proposed Submission

From the Alexandra Park and Palace Conservation Area Advisory Committee

The following points are given in the order of the Core Strategy:

APPCAAC POINT 1

Section/ chapter/ policy	Introduction/ 1.3/ Muswell Hill Area Assembly
Page/ paragraph	36/ 1.3.36
Intention: support/ object	Object
Soundness/ legality	Unsound

Comment:

Paragraph 1.3.36 correctly describes Alexandra Palace as an important historical and iconic building and we welcome that. The second sentence includes a clause in quotation marks which purports to be a quotation from Section 17 of the 1900 Act of Parliament related to Alexandra Palace. However, the quotation given is incorrect.

We ask that the correct phrase be substituted, which is: "the park *palace and other lands* shall be available for the free use and recreation of the public for ever".

APPCAAC POINT 2

Section/ chapter/ policy	Introduction/ 1.3/ Muswell Hill Area Assembly
Page/ paragraph	38 after 1.3.38
Intention: support/ object	Object
Soundness/ legality	Not justified

Comment:

Under the heading 'Opportunities', the third bullet point refers to an "Opportunity to create a Cultural Area at Alexandra Palace".

There appears to be no basis for this claim and the "Cultural Area" idea is barely developed further in the Core Strategy (SP15). It was not referred to in the Preferred Options consultation in 2009.

The Palace and Park are not places where the cultural areas need be "created": since 1873 under the Alexandra Palace Acts 1900-86 they have always been and remain places of "resort and recreation", where music, drama, television and other arts have been practised and made available to the public.

We suggest:

The reference to Alexandra Palace is unnecessary and should be deleted.

Also, see APPCAAC Point 13 on page 7, which comments in more detail on the above point in the context of SP15.

APPCAAC POINT 3

Section/ chapter/ policy	Managing Growth/ Chapter 3/ SP1
Page/ paragraph	60/ 3.1.7 and 3.1.9 Heartlands
Intention: support/ object	Qualified support
Soundness/ legality	Is sound

Comment:

(3.1.8)
In para 3.1.7, we support that part of the Heartlands vision "providing jobs and high quality open space". Both are crucially important aspects of a scheme that risks being characterised as almost wholly residential and high density.

In para 3.1.9, we support in principle the statement: "There is significant scope for the enhancement of these areas building on the areas' industrial heritage", but note that the term "building on" is ambiguous. We suggest alternative wording for this sentence, to be:

There is significant scope for the enhancement of these areas while respecting their industrial heritage.

11/3/21
~~22/8~~

~~22/9~~

11/4/21

APPCAAC POINT 4

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP11
Page/ paragraph	141, / 6.1.17 Tall buildings
Intention: support/ object	Object
Soundness/ legality	Not justified

Comment:

We object to the first and second sentences in para 6.1.17 that includes the adopted definition of tall buildings. We see no reason to depart from the CABE/English heritage Guidance on Tall Buildings. Our concerns here are that any tall buildings in Haringey Heartlands could have a negative impact on the adjoining Alexandra Park and Palace Conservation Area. We suggest alternative wording for these sentences, to be:

The Council has adopted the definition of tall buildings as those that are substantially taller than their surroundings. Such buildings will only be permitted in the two areas, Haringey Heartlands/Wood Green and Tottenham Hale, where the expected limit is 10 storeys.

In addition, we note that UDP 2006 Policy UD9, which is to be superseded by SP11 had two clauses in it that we think should be retained in SP11 – these are (d) wind turbulence and overshadowing - and (e) impact on historic environment, Green Belt and MOL.

Specifically, we ask that the following paragraph from UD9 be inserted between existing 6.1.16 and 17:

Tall buildings which would be conspicuous from the historic environment, Green Belt or MOL locations should not injure the visual amenities of those locations by reason of the siting, materials or design of the tall buildings proposed.

~~232~~
11/6/11

~~232~~

11/6/11

APPCAAC POINT 5

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP12 Conservation
Page/ paragraph	142/ SP12 Conservation Policy Statement
Intention: support/ object	Qualified support
Soundness/ legality	Justified

~~2/7~~
11/7/16.2

Comment:

In the first two bullet points we note the inclusion of the term “and their settings” – we welcome and support this.

The final statement of policy is expressed in terms of: “The Council will support developments that do not have a negative impact on the setting of CAs.” As it stands, this doesn’t mean very much. We would like this to be strengthened by inclusion of the word “only” after Council, so that it would read:

The Council will only support developments.... that do not have a negative impact on the settings of CAs, etc.

Alternatively, this could be reworded along the lines:

The Council will not support developments that have a negative impact on...

APPCAAC POINT 6

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP12 Conservation
Page/ paragraph	142/ 6.2.1 Haringey's heritage
Intention: support/ object	Qualified support
Soundness/ legality	Justified

~~2/6~~
11/2/16.2

Comment:

The paragraph refers to the “Historic Environment Record” and itemises: Locally Listed Buildings and Historic Green spaces, Designated Sites of Industrial Heritage and Archaeological Priority Areas. We welcome and support this, but would like to see more prominence given to these records elsewhere in the Core Strategy.

We request that the lists of Industrial Heritage which include the detailed description of the importance of Alexandra Palace be reinstated. (See the APPCAAC's comments later on DMP25)

APPCAAC POINT 7

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP12 Conservation
Page/ paragraph	146/ 6.2.16,17 and 18 Strategic and Local Views
Intention: support/ object	Qualified support
Soundness/ legality	Justified

Comment:

We strongly support the recognition given to the need to protect strategic and local views.

We support the three bullet points in 6.2.17. But we would also like to see reference to the views within conservation areas. We suggest the second bullet point should be reworded:

- **Views into, within and from Conservation Areas...**

We note that 6.2.18 states that Local Views will be identified in a forthcoming Conservation SPD. We support and welcome the production of such a list and offer our help in its compilation.

APPCAAC POINT 8

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP12 Conservation
Page/ paragraph	147/ Indicators to monitor delivery
Intention: support/ object	Qualified support
Soundness/ legality	Justified

Comment:

11/9/16.2
2/5/9

11/10/16.2

2/1/17

11/2/16.3

The seventh bullet point here is to do with Conservation Area appraisals. We support and welcome such appraisals. These are important documents and the Council needs to devote more resources for their production.

APPCAAC POINT 9

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP13 Open Space
Page/ paragraph	149/ SP13 Policy Statement
Intention: support/ object	Support
Soundness/ legality	Justified

~~2/5~~

1/12/6.3

Comment:

We support and welcome all the policy statements and particularly the first bullet point with its references to MOL, designated Open Spaces and Green Chains.

APPCAAC POINT 10

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP13 Open Space
Page/ paragraph	150/ 6.3.3
Intention: support/ object	Support
Soundness/ legality	Justified

~~2/7~~

1/13/6.3

Comment:

We support and welcome the final sentence of 6.3.3, which limits development on sites adjacent to open spaces.

APPCAAC POINT 11

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP13 Open Space
Page/ paragraph	153/ 6.3.8
Intention: support/ object	Support
Soundness/ legality	Justified

209
1/14/16.3

Comment:

We support and welcome the inclusion in 6.3.8 the reference to the New River as an equally important green/river corridor. The New River/ green corridor is on the eastern boundary of Alexandra Park and the MOL – it deserves greater recognition and protection than hitherto.

APPCAAC POINT 12

Section/ chapter/ policy	Safer for all/ Chapter 6/ SP13 Open Space
Page/ paragraph	158/ 6.3.21 Open space deficiency
Intention: support/ object	Object
Soundness/ legality	Not justified and not effective

274
1/15/16.3

Comment:

Open space provision will be an important consideration in the development of Haringey Heartlands and could be a limiting factor on the scale and density of the residential development there.

6.3.21 suggests that increased access to Alexandra Park could be counted as open space provision for Heartlands. This is unrealistic – the only practical access between the two is via a pedestrian tunnel and a long footpath detour. While we emphasise the APPCAAC would welcome increased use of the Park (and the Palace) by Heartlands residents, this is not a realistic substitute for open space provision close to residential development.

We suggest deletion of the sentence: Options for increasing access to Alexandra Park from Heartlands should be considered.

APPCAAC POINT 13

Section/ chapter/ policy	Culture and Leisure/ Chapter 7/ SP15
Page/ paragraph	175 and 7/ SP15 Policy Statement and 7.210
Intention: support/ object	Object
Soundness/ legality	Not justified and not effective

1/16/17.2

Comment:

The SP15 policy statement indicates the development of “cultural areas” and in the fourth bullet point includes Alexandra Palace linked with Wood Green/ Haringey Heartlands. Similarly, Alexandra Palace is referred to in the heading above 7.2.10.

While Alexandra Palace is an important Grade II listed building of enormous cultural significance in its own right, it is relatively remote from the Wood Green Cultural Quarter, and qualitatively and conceptually different to it.

The future development of Alexandra Palace in its correct historical and cultural context is something that the APPCAAC would support, particularly in relation to the TV Studios and the Victorian Theatre. But it is entirely inappropriate to lump it in with the Wood Green/Heartlands concept. There was nothing in the Preferred Options Consultation (2009) to suggest that this idea might be part of the Core Strategy.

We suggest: References to Alexandra Palace be deleted from the fourth bullet point of SP15, deleted from the heading above 7.2.10 and from the first bullet point of the Indicators on page 182.

Similarly, Alexandra Palace should be deleted from Map 06 and its associated document, “Proposed changes to the 2006 UDP Proposals Map”.

APPCAAC POINT 14

Section/ chapter/ policy	Appendix 1 UDP Saved Policies
Page/ paragraph	205/ Metropolitan Open Land
Intention: support/ object	Qualified support
Soundness/ legality	Possibly unsound

Comment:

The Core Strategy proposal is that UDP Policy OS2 Metropolitan Open Land (MOL), be superseded and subsumed into SP13. This would mean reducing OS2, which runs to about seven paragraphs to one single paragraph, 6.3.11. While we support 6.3.11 in principle, this suggests a diminution of the importance attached to MOL at a time when we consider its actual importance to be on the increase

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We suggest, the whole of OS2 be retained as an ancillary reference to SP13.

1/17/19

APPCAAC POINT 15

Developers & Management - Points 15-18

Section/ chapter/ policy	Appendix 1 UDP Saved Policies
Page/ paragraph	205/ Alexandra Park and Palace
Intention: support/ object	Objection
Soundness/ legality	Unlawful/ unsound

Comment:

The Core Strategy proposal is that UDP Policy OS4 Alexandra Park and Palace should be superseded by DMP26 and subsumed into SP13. While this looks to be a simple transfer from one format to another, there are some differences and some objections, including:

1. In DMP26 the word "Park" has been dropped from its heading – it should read Alexandra Park and Palace.
2. Similarly, the reference to Park has been lost at two places in the opening statement..
3. The first clause (a) in OS4 was "conserve and enhance the habitat and ecological value of the Park". This clause needs to be retained.

We suggest that the whole of OS4 be incorporated into DSP26 with one exception, see below.

The original OS4 had as the last part of clause (e) the following sentence: "*Within the existing curtilage of the Palace some ancillary use for food and drink (use class A3), Business (Use Class B1), residential, hotel and conference purposes may be acceptable as part of a mixed-use scheme.*" It is our contention that the inclusion of the words "Business (se Class B1) and residential" was an error on OS4 that was not detected at the time of drafting.

We object to any business use other than that which is ancillary to hotel and conference use, and also object to any residential use other than might be associated with hotel use. Our objection is based on the various Acts of Parliament which define and limit the lawful uses that can be made of Alexandra Park and Palace.

We ask that clause (e) should be rewritten:

Within the existing curtilage of the Palace some ancillary use for food and drink (use class A3), hotel and conference purposes may be acceptable as part of a mixed-use scheme.

We will give further and more detailed consideration of DMP26 when all the DMPs are presented for formal consultation

APPCAAC POINT 16

Section/ chapter/ policy	Appendix 1 UDP Saved Policies
Page/ paragraph	205/Development Adjacent to Open Space
Intention: support/ object	Qualified support
Soundness/ legality	Possible unsound

Comment:

The Core Strategy proposal is that UDP Policy OS5 Development Adjacent to Open Space and Palace should be superseded by DMP27.

We support the overall policy statement of DMP27 and paragraphs 6.67 and 6.68, but we have an objection to 6.69 – this refers to the “operational needs of utility companies” and how in particular cases new infrastructure needs may override protection of the visual character of the land. We argue that this favouring of utilities is a legacy of the time when they were public service community owned companies that had prior claim over privately owned plcs. This is no longer the case and utility companies are in the main commercially driven enterprises that do not deserve favoured treatment.

We suggest the second sentence of 6.69 be deleted and the first sentence rewritten as:

When assessing development proposals on land adjacent to Green Belt, MOL or SOL, the operational needs of the utility companies should be taken into account, but they should not override other considerations.

We will give further and more detailed consideration of DMP27 when all the DMPs are presented for formal consultation

APPCAAC POINT 17

Section/ chapter/ policy	Appendix 1 UDP Saved Policies
Page/ paragraph	205/ Historic Parks...Heritage Land
Intention: support/ object	Qualified Support
Soundness/ legality	Possibly unsound

Comment:

The Core Strategy proposal is that UDP Policies OS7 Historic Parks... and OS8 Heritage Land, should be superseded by DMP25

We support and welcome the bringing together of these two previously separate policies into one DMP, but we do have concerns about the apparent diminution of importance of some aspects of historic parks and gardens.

OS7's paragraph 8.24 included references to specific parks including Alexandra Park, which is identified by English Heritage in a Register of Parks and Gardens of Special Historic Interest in England as historic parks and gardens. The paragraph goes on to say: "Following collaborative research with the London Historic Parks and Garden Trust, the Council has identified a number of parks, gardens, cemeteries and churchyards of local historic interest, which are listed in Schedule 13" and ends with the statement "Historic parks and gardens are identified on the Proposals Map". We would welcome such a schedule and such identification on the map.

OS7's paragraph 8.25 includes a reference to SPG 2 (Conservation and Archaeology). There are elements of SPG 2 that we would like to retain in DMP25.

We suggest:

The whole of paragraph 8.24 and 8.25 of OS7 should be incorporated into DMP25.

We will give further and more detailed consideration of DMP25 when all the DMPs are presented for formal consultation.

APPCAAC POINT 18

Section/ chapter/ policy	Appendix 1 UDP Saved Policies
Page/ paragraph	206/ Development in Conservation Areas, Listed Buildings, Alterations and Extensions..., Demolition...Archaeology / CSV1 to CSV8
Intention: support/ object	Qualified Support
Soundness/ legality	Possibly unsound

Comment:

The Core Strategy proposal is that UDP policies, CSV1 and CSV2 are superseded by Core Strategy SP12 and then taken as part of DMP25, and that CSV1 to CSV8 are superseded by DMP25.

While there is some merit in bringing together these related stands of policy we have doubts about the losses of some of the statements that were contained in the CSVs, while we support some of the new elements.

Examples of things that we support include:

1. In CSV1, 11.5 there is a reference to the role of CAACs and we would like this to be retained. Similarly, in CSV2 we support the unambiguous introductory statement: "There is a presumption in favour of the preservation of listed buildings".
2. Other parts of DMP25 are welcomed and we support, e.g. in the overall statement of policy on Conservation Areas (page 85/ 86), clause (b) states: "The Council will (b) retain or reinstate characteristic features such as doors, windows or materials."

Examples of things that we object to the loss of include:

1. CSV3 included a commitment from the Council to maintain a list of locally listed buildings – we would like this to be reinstated.
2. CSV4 relates to alterations to listed buildings – this too we would like to be part of DMP25.
3. CSV5 relates to alterations or extensions to buildings in Conservation Areas – there are elements of this that we would like to retain in DMP25.
4. CSV6 and CSV7 relate to demolition – again we have concerns that some of these elements should be retained in DMP25.

5. CSV8 relates to archaeology – it includes Tables 11.1, 11.2 and 11.3, which give details of significant sites. Although the proposed DMP25 includes in Table 1 (page 90) a list of Areas of Archaeological Importance, this does not correlate with what is in CSV8 and there are serious omissions. We would like to see all the valid elements in CSV8 taken into DMP25.

Our overall view of DMP25 is that while there are some things in it that we support, there is a need for further development of it before it is acceptable. We will submit further comments when DMP25 is up for formal consultation.

18 June 2010