

As Amended 21.06.2010

### Haringey's Proposed Submission Core Strategy Making a Representation: Response Format

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### Core Strategy - Making a Representation Response

Policy	Muswell Hill Area Assembly
Page /Paragraph	36 1.3.36
Intention Support/Object	Object
Soundness/Legality	Unsound and illegal by omission

**Comment: 1.3.36-** 'that the park be made 'available for the free use and recreation of the public forever' " isn't true and may well be an error. The most important part of the 1900 Alexandra Park and Palace Act, left expressly untouched in all amendments, is s17 and what it *actually* says is: **'the park and other lands shall be maintained as an open space and the park palace and other lands shall be available for the free use and recreation of the public for ever.'** It is important to quote in context what the Act actually says, so suggest the Core Strategy quotes what the Act actually said.

39/1/1.3  
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**Last line of 1.3.36**

'Alexandra Palace remains a significant leisure and recreation area for Haringey residents and visitors' – gives the impression that Haringey residents take priority but the Acts of Parliament state that its is the people of London who are beneficiaries of the Charitable trust, and the London Borough of Haringey is the trustee or nominal owner on behalf of the people of London, who are beneficiaries. It is also misleading to give the impression that leisure is the purpose of The Acts or indeed its main useage by its visitors, both untrue. It is important to the purpose of the Acts that they expressly use the word 'resort' and this gives the sense of escape, refuge, a primary reason of why the trust was set up. Suggested wording to replace: **"Alexandra Park and Palace remains a significant resort and recreation area for Londoners and the Palace is of national public importance housing the first television studios, and widely known as the birthplace of television."**

**Policy Haringey Spatial Strategy**

Page/Paragraph 54 2.1.2  
Intention Object

Soundness/Legality    unsound and unjustified

**1) Comment**

"The borough is expected to provide 11,195 homes between 2011 and 2026"  
The London Plan is under consultation until the Autumn and all local authorities have been asked to hold on and wait for the new housing policies and targets from the new coalition government.

There are far too many dwellings and these sort of figures are not sustainable, and land is limited. Intensive housing is desperate way to plant communities, this is an artificial and may well lead to disastrous effects with too many people in an area, this leads to tensions and crime.

39/2/2.1

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There simply isn't enough land nor infrastructure to handle this number of dwellings. Overcrowding brings its own problems. The Council should look at its own stock first Council housing first of over 21000 dwellings ie Albany Close N15 and Campsbourne Estates where enhancements in design and better use of land can be made to alleviate pressure on adjacent green belt or open space so they can be left to do the their primary role of providing resort, refuge, escape and recreation. There umpteen examples of low build problem design housing that can be made more efficient, and provide the residents a better space and standard of living without going to high rise. New River Village is not a good example because there appears little integration with the rest of Hornsey, planting 'communities' was not a good idea there, better to evolve where possible. Each estate there is isolated.

**2) Page/Paragraph    54    2.1.4**

Intention                    Object

Soundness/Legality    unsound and unjustified and unlawful and undeliverable.

**Comment**

'Haringey Heartlands and Tottenham Hale will be the key locations for the largest amount of Haringey's future growth. These areas are suitable for large scale redevelopment with significant increases in jobs and homes.'

The sites were chosen without direct consultation or engagement with the public, particularly how the sites have been chosen and for what use. Haringey Heartlands' major high intensity housing and mixed use is located along lengthways the sensitive OS6 ecologically valuable site, Borough Grade 1 importance and ecological Corridor OS6, Historical Park, and Conservation Area. Some of the high density development will be inside conservation area. Such high density in The Haringey Heartlands will emit pollution from population density, noise, heating lighting, and waste and will be detrimental to these areas where protected species of migrating birds, butterflies, slowworm and the rare stag beetle inhabit. Further it is wrong that to depend on Alexandra Park to support housing requirements for open space and children's facilities. The Alexandra Park and Palace Acts of 1900-1985 preclude such use and state that 'the park palace and other lands are open to the public forever for resort and recreation and for other public use'. Haringey Council is a trustee of the Alexandra Park and Palace ie to whom legal title to property is entrusted to use for another's benefit ie the people of London specifically for purposes of public use. All housing must provide their own open space. This plan is undeliverable.

39/3/2.1

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39/4/2.1

**3) Page/Paragraph    56    2.1.9**

Intention                    Object

Soundness/Legality    unqualified and unjustified

~~271~~

39/4/2.1

**Comment**

The paragraph makes assertions about the provision of mixed use buildings and benefits of developments. There is no evidence to support these assertions ie Heartlands New River Village development of Pumphouse and internal boarded up block. The recession has had an effect on retail led mixed use. So evidence is needed first.

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Page/Paragraph 56 2.1.10  
Intention Object  
Soundness/Legality unqualified and unjustified

There is no evidence that mixed use will provide any benefits as this cannot be planted there and is driven by local demand. Low quality commercial developments for retail led or office use have taken a tumble in the recession and are rife for dereliction and unsafe, times have changed since this policy was proposed. Betting shops and low quality retail are not useful in regeneration.

39/5/2.1

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The Council should provide evidence that mixed use schemes in Haringey provide meaningful improvements to the areas or accept that it should cease to promote it due to change of economic climate.

**Policy Managing Growth- Growth Areas Haringey heartlands**

Page/Paragraph 60 3.1.7  
Intention Object  
Soundness/Legality unsound and unjustified and undeliverable and unqualified

**Comment:**

'Haringey Heartlands development Framework was produced in 2005 and sets out the Council's overall vision for the area including promoting and expanding the Cultural Quarter, providing new homes and jobs and high quality open space.'

39/6/3.1

- 1) What is meant by 'high quality'- meaningless without qualifying this and expanding what is meant. Does it mean that open space will be provided with the development or existing open space accessed? If so which?
- 2) 2005 was 5 years ago when economic boom was in the horizon, even the Council must recognise that times have changed. The Cultural Quarter, if it is to thrive **must** have **fixed low rent** studios or **assisted rent** studios for start up artisans. The Chocolate Factory is one example which had good intentions but the outcome now is unaffordable with high rents.
- 3) 'Cultural Quarter' definition or supporting documentation re strategy not available.
- 4) Definition is too wide and could mean anything. Please provide a definition of what cultural activities are being envisaged.

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For instance:

Cinema, theatre, playhouse, concert hall, gallery, art studios, interactive libraries, adult college for arts and computing, seniors learning centre, childrens montessoris/creches, language centres, live music clubs, community spaces, dance centre or learning, wellbeing centres, boutique and artisan shops, menders, repairs,.... café and restaurants as ancillary to these.

Please define since the downside is it'll be the out of date vision of retail parks, betting shops and office space! Times have moved on.

**Policy Housing**

Page/Paragraph 79 SP2  
Intention Object  
Soundness/Legality unsound and unjustified and undeliverable and unqualified

**Comment:**

SP2 Number (1) states that 'new development meets the density levels set out by the London Plan (Table 3A.2 Density Matrix).'

The central urban and suburban areas of Haringey should be defined clearly on the map and no justification has been offered for this not being done, as the inspector at UDP 2006 public inquiry has said to be "identified in a reasoned justification and shown clearly on an accompanying map."

~~287~~  
39/7/13.2

**Policy Conservation**

Page/Paragraph 142 6.2.1 Haringey's Heritage  
Intention Support  
Soundness/Legality Justified

**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.

~~288~~  
39/8/16.2

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

**Policy Conservation**

Page/Paragraph 142 6.2.1 Haringey's Heritage  
Intention Qualified Support  
Soundness/Legality Justified

'Areas of Archaeological Importance' List is now called 'Archaeological Priority Areas'? this takes away from the meaning of 'importance', can we reinstate the old heading? No advantage for this change.

~~289~~  
39/7/16.2

**Policy Conservation**

Page/Paragraph 142 6.2.1 Haringey's Heritage  
Intention Qualified Support  
Soundness/Legality Justified

1) The Description under 'Designated Sites of Industrial Archaeology (GLIAS)' Table 11.1 of CSV8 must be reinstated:

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39/10/16.2

**Site: 'Alexandra Palace'**

Description: 'Alexandra Palace N22- Important 19<sup>th</sup> Century exhibition centre. TV Studios and mast (1936) of great historical interest. Victorian Theatre of 1873-5 with original stage machinery, brickwork from first palace of 1870, pioneering architectural use of iron and glass in roof of second Palace of 1875.'

2) The Description under 'Designated Sites of Industrial Archaeology (GLIAS)' Table 11.1 of CSV8 must be reinstated:

**Site: 'Disused Railway Finsbury Park to Highgate and Alexandra Palace N22'**

Description: 1) Station Building at Alexandra Palace and 2) The Viaduct 3) 1940 interchange station at Highgate 4) Twin Tunnels 5) Transformer Station. Current Use as The Parkland Walk.

**Policy Open Space and Biodiversity**

Page/Paragraph 148 SP13  
Intention Support  
Soundness/Legality Justified

**Comment:**

Support point (1) and all the policy points re MOL, open space, green chains, allotments and other open spaces

39/11/6.

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**Policy Open Space and Biodiversity**

Page/Paragraph 150 6.3.3  
Intention Qualified Support  
Soundness/Legality Justified

**Comment:**

Support and welcome the last line.

2/12  
37/12/6.

**Policy Open Space and Biodiversity**

Page/Paragraph 158 6.3.21  
Intention Object, Soundness/Legality Unjustified, unsound and unlawful

**Comment:**

The need for open space for Haringey Heartlands. 'Part of Noel park ward is considered to be deficient in access to open space.' Untrue since its not just Noel park according to Figure 6.4 page 157, which clearly shows parts of Crouch End and large part of Fortis Green and west of Alexandra ward are more than 280m and 400m away from open space and show larger deficiency than Noel Park.

**Suggest wording:**

'Part of Noel park ward, is considered to be deficient in access to open space, but this should be considered in context with north-eastern part of Crouch End ward, substantial part of Fortis Green ward and western part of Alexandra ward, and western part of Highgate are considered to be deficient in access to open space.'

39/13/6.3

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**Policy Open Space and Biodiversity**

Page/Paragraph 158 6.3.21  
Intention Object  
Soundness/Legality Unjustified, unsound and unlawful

**Comment:**

'options for increasing access to Alexandra Palace Park from Haringey heartlands should be considered.'

This is unlawful and unrealistic to rely on the Alexandra Park and Palace for open space requirements to developments. Section 106 moneys is not the only criteria since the Alexandra Park and Palace Acts preclude the land's reservation to residential developments, and Alexandra Park and Palace is for Londoners to use for public purposes, Haringey is only trustee and therefore Alexandra Park and Palace is not a municipal park and

39/14/6.3

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should not be treated as such. Practically the topography rules out larger access. Provision of open space is needed for new developments.

**Please delete:** 'options for increasing access to Alexandra Palace Park from Haringey heartlands should be considered.'

**Policy Culture and Leisure**

Page/Paragraph 174 SP15  
Intention Object  
Soundness/Legality Unjustified, unsound, undeliverable and unlawful

**Comment:**

**'Re Wood Green/Haringey Heartlands/Alexandra Palace'**

It is arguably the most iconic building in North London, if not the most important.

It will be extremely difficult to have similar policies or even use the same developers for Alexandra Palace as for Haringey Heartlands and Wood Green. Legally, practically, and culturally they are at odds. APP is going through governance where this has not been mentioned and they are looking at other ways to preserve the history and ensure its public use as per the purposes of the Acts of Parliament. Alexandra Park and Palace has a unique history and culture and deserving of world protection status as a place from where the first TV signal was broadcast, the first TV Studios in the World, where the Open University started, A Victorian Theatre capable of 3000 seats as well as other firsts!

39/15/7.2  
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Not all lands or buildings are the same so 'Dual use' will not always be possible as in this case for APP, its too important a building and large scale, and historic to lump with anything else. It needs innovative direction and a driven and focused independent board of trustees . The charitable board of APP are entrusted to ensure its uses according to the ACTs of 1900 to 1985. The Park and Palace are linked by the Acts and one cannot contemplate one without the other.

39/16/7.2

Recommend to omit **Alexandra Palace** from **Wood Green/Haringey Heartlands**

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**Policy Culture and Leisure**

Page/Paragraph 177 7.2.8  
Intention Object  
Soundness/Legality Unjustified, unsound, undeliverable and unlawful

**Comment:**

**'Culture is defined as 'an engine for communities through recreation, celebration, and stimulation, as well as the social glue which can bring people together....'**

This definition is woolly and meaningless even taking the lowest common denominator. Please change to: 'The state of being cultivated; result of cultivation; physical improvement; enlightenment and discipline acquired by mental and moral training; civilization; refinement in manners and taste.'

Oxford Dictionary- noun 1) **the arts, humanities and other manifestations of human intellectual achievement regarded collectively.**

**Policy Culture and Leisure**

Page/Paragraph 177 7.2.10

Intention Object

Soundness/Legality Unjustified, unsound, undeliverable and unlawful

**Comment:**

39/17/12.2

**'The Cultural Area of Wood Green is dominated by the Chocolate Factory'**

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Not strictly true since rents for artists studios have increased driving out small artisans. These are due to go up further against market trend in this recession over next 2 years. This statement was true before the recession and the new landlord and managing agents took control. The landlord is a commercial landlord where he is increasing rents yearly. Not justified.

Secondly the Chocolate factory is one building and the area around is largely scary and derelict.

Thirdly for this to work affordable workspaces with guaranteed low rental have to be a requirement.

Finally, '**Wood Green Action Plan**' is mentioned. This is not included in the CS Document

**For the reasons above Alexandra Palace should be looked at individually and not lumped with anything else, to separate AP from the Cultural Area**

**Development Management Plan  
Making a Representation: Response Format**

Contact Details:

**Policy DMP25 Haringey's Heritage**

Page 77

Intention Object

Soundness/Legality Unjustified, unsound and unlawful

**Comment:**

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

8.25 refers to SPG2 Conservation and Archaeology document is referred to and provides detailed information about Alexandra Park and Palace.

Reason: 'However, because of the importance of Alexandra Park and Palace to the borough, a section on it appears in the MOL section of the Plan as well as further detailed information in **SPG2 Conservation and Archaeology.**'

**Policy DMP26 Alexandra Park and Palace**

Page 81  
Intention Object  
Soundness/Legality Unjustified, unsound and unlawful

**Comment:**

- 1) Word 'Park' is missing from the title of DMP26 the title should read '**Alexandra Park and Palace**'
- 2) First line of OS4 is missing, to reinstate '**Alexandra Park and Palace represents MOL of a unique character, which will be safeguarded in accordance with the above policy on MOL**'
- 3) OS4 (d) is missing, to reinstate '**enhance outdoor recreational, leisure and sports opportunities within the Park, having regards to the needs of a wide range of users including the need for passive recreation**'
- 4) reinstate word 'Park' into '**a) not result in any greater impact on the purposes of including Alexandra Park and Palace within MOL.**'
- 5) I and others would 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.'  
Residential and business use are not in accordance with the purposes of the Parliamentary Acts as amended for which Haringey Council is a Trustee. Unnecessary to include this, as it envisages uses that are contrary to the Acts and therefore unlawful. Quote from 1900 APP ACT several references as '*a place of public resort and recreation and for other public purposes.*'

**Policy DMP28 Ecologically Valuable Sites and Their Corridors**

Page 84  
Intention Object  
Soundness/Legality Unjustified, and unsound

**Comment:**

- 1) OS6 clause 8.20 - SPG8g '**Ecological Impact Assessment**' document to refer to is missing from DMP28 where it gives instances when Council would request an EIA. Would also suggest to add 'where developments over 99 dwellings are being planned, for the Council to carry out its own independent EIA and other environmental impact assessments as is necessary.' in addition to developer.



2) OS6 clause 8.22 – line is missing and important 'These sites are identified on the proposals map and listed in Schedule 11: Ecologically Valuable Sites.' Can this be reinstated and APP included in this as before?

3) DMP28 states for further guidance to refer to **Haringey's Biodiversity Action Plan 2009** (not in this document and should be included as part of next consultation)

**Policy DMP and SITE ALLOCATIONS DOCUMENTS**

Page	84
Intention	Object
Soundness/Legality	Unjustified, unsound and unlawful

**Comment:**

**DMP Document is unsound because its badly worded, has no paragraph numbers, parts missing, is very hard to follow and again is not consulted upon, The Planning Portal website for all 3 documents cuts off and is unwieldy.**

**Recommend having a public forum to explain site and DMPs**

**UDP 2006 MAP amended**

Soundness/Legality Unjustified, unsound and unlawful

**Comment:**

We were told at a meeting in May that The UDP 2006 has been amended to include Alexandra Park and Palace into the Cultural Quarter. This has not been consulted upon and is being done before the adoption of the Core Strategy. Alexandra Park and Palace is a historic Grade 2 listed and parts of AP Theatre is Grade 2\*. These have a unique history and culture of their own and the governance is being reviewed currently, Their needs to be one strategy for Alexandra Park and Palace as it distinct and totally different in character and quality to Wood Green High Rd or Clarendon Road or Heartlands which are brown field sites. There is no merit in lumping them together, and the governance issues and the Trust still prevail with APP. This policy is at odds with itself, Alexandra Palace is not a municipal building and this may well restrict development.

**Site Allocation Document**

1) Page 55 Cramwood Home for The elderly and also St Lukes Hospital sites  
Coppetts Rd N10

## OBJECTION

The conversion of these sites are unsound, unjustified and need further consultation.

The information is scant, more information information on current use and ownership information is needed.

Believe the care home is active with 36 beds, much needed (see local press Thursday 17<sup>th</sup> June).

Not enough information, or any consultation has been offered or done. There is a pressing need for elderly residential homes and mental care homes with our aging population. Badly required in Muswell Hill.

Proof needed that the local infrastructure can support further housing. Also transport links are very poor in this location and the car will be relied upon to commute, close to the North Circular.

So ideal for the current use of mental care and elderly care homes.

2) The Town Hall Crouch End N8

The car park should be upgraded to open space due to open space deprivation as shown by map figure 6.4 page 157 clearly shows even before the development, in line with Core Strategy policy of upgrading or providing open space in areas of deprivation.

Underground parking should be provided due to poor access via congested small roads and buses only, if this cultural project is to be given a chance to work.

Locals have asked for a cinema.

Haringey Council should reduce building dwellings in low rise and not build inside the deco block.

If the Council were to take risk of selling or renting the flats, it would have been better. To do the plans (which the Council has done already) and get them built and pay the developer with a number of flats. The buildings can be done in stages, block by block to mitigate risk. This would reduce the number of flats by a third at least. There is risk any way, and selling land at a low rate is a poor use of public assets.

**END**

Please make this response an addendum to My Response to Core Strategy 'as amended 21.06.2010'.

## **Haringey's Proposed Submission Core Strategy Making a Representation: Response Format**

Contact Details:

First name: NAME

Core Strategy SP13 supported by DMP26 and 28  
Clause 6.3.23

The Park, of Alexandra Park and Palace should be upgraded from Borough Grade 1 Ecological Valuable Site to Metropolitan Importance and Nature Reserve in parts. There is now evidence of BAP species of conservation concern and rare species of invertebrates, bats, birds and flora and fauna under The Wildlife and Conservation Act 1981 and in line with National Planning Policy- PPS9 Biodiversity and Geological Conservation and the Mayor's Biodiversity Strategy GLA 2002

Evidence: 1) Rural Arisings report on habitat phase 1  
2) BBC Springwatch Scientist discovery unidentified variety of rare fungi and proof of protected Lucanus Cervus stag beetle and Amphotis Marginata Beetle

In addition:

5 species of bats within 1km BAP protected  
Slow worm *Anguis fragilis* protected as a reptile  
White-letter hairstreak butterfly *Satyrrium w-album* (for which Alexandra Park is noted for its population)

**From APOG (Alexandra Park Ornithological Group) website:**

'There are over 100 bird species amongst them warblers (including Garden and Lesser Whitethroat), chats (Whinchat and Northern

Wheatear are regular) and other migrants. Rare Birds spotted and recorded, notably The Yellow-browed Warbler in October 2005. Other interesting species recorded in recent years include Brent Goose, Barn Owl, Black Redstart and Ring Ouzel (protected birds under Wildlife and Countryside ACT 1981)