

London Borough of Haringey Core Strategy

Statement of Un Common Ground (SoCG) position at 13 June 2011

Between

London Borough of Haringey (LBH)

And

Chris Chadwick (CC) and Friends of Priory Park (FoPP)

In respect of issue:

In respect of issue (document order)	Representation Ref. No.
SP1 Managing Growth Paragraph 3.1.8	9/3/3.1
SP13 Open Space ad Biodiversity, para 6.3.12	18/1/6.3
SP13 Open Space ad Biodiversity, para 6.3.12	18/2/6.3

Background

This Statement of Un Common Ground relates to one representation made by Christopher Chadwick and one made by Friends of Priory Park (also submitted by C Chadwick) to the Council's Proposed Submission Core Strategy (June 2010). At submission stage LBH submitted the Proposed Minor Changes addressing the above representations. However, CC and FoPP still have some concerns regarding the boundary of Haringey Heartlands Growth Area and the review of Metropolitan Open Land (MOL). The remaining outstanding points of difference are set out below.

Christopher Chadwick/Friends of Priory Park					
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9/3/3.1	3.1.8	Text refers to the development of areas in Haringey Heartlands that have already undergone development. Hornsey Waterworks should be removed from this paragraph.	<p>Factual corrections: Amend text to reflect that New River development is almost complete.</p> <p>Current position (June 2011): LBH agrees to remove reference to Hornsey Waterworks in paragraph 3.1.8 as the development is now complete.</p>	No comment	
9/3/3.1	3.1.8	Hornsey Central Depot should not be referred to in the context of Haringey Heartlands. This site should be treated sensitively with reference to its connection to Hornsey High Street Conservation Area and its proximity to the base of Alexandra Palace.	<p>Haringey Heartlands Development Framework (2005) comprises the whole of the western and eastern utilities lands, together with areas that provide vital links to Wood Green and Hornsey Centres. The western utilities lands include the former Hornsey Depot site and the former Waterworks site. Development is now complete at the Waterworks site. There are no proposals to remove the Hornsey Depot site from Haringey Heartlands.</p> <p>Current position (June 2011): No further change proposed.</p>	<p>The area of common / uncommon ground is around use of Haringey Heartlands Framework (April 2005) for development of Hornsey Depot Site.</p> <p>Whilst the Framework has positive aspects in terms of an integrated approach, the way the Hornsey Depot Site has been treated within this document is fundamentally flawed as <i>it is not founded on a robust and credible evidence base</i>. Because the document is in fact based on out of date evidence and assumptions the Council</p>	

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				<p>has taken an inconsistent (dual) approach when attempting to bring development for the Depot Site forward.</p> <p>My evidence for the above statement is:</p> <ul style="list-style-type: none"> • Planning permission granted on 8th June 2000 in respect of 1997 planning application (HGY 54087) • Haringey Heartlands Framework (April 2005) • The Hornsey Depot Site proposal booklet "Hornsey Works" produced by Inner Circle property developers in 2007 on behalf of the consortium including Haringey Council and Sainsbury Supermarkets. • Agenda 20 item at Haringey Cabinet 13 July 2010 – the Hornsey Central Depot report <p>The dual approach I have</p>

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				<p>identified comprises:</p> <p>(1) ignoring the aspirations of the framework for a pedestrian fronted High Street and to improve the pedestrian and cycle flow from Hornsey High Street through the Depot Site to Wood Green via the foot tunnel under the railway.</p> <p>but because it continues to push for the need of a mid sized supermarket as part of the “integrated” approach with a small parcel of Sainsbury owned land</p> <p>(2) it presses for taller buildings within the Depot site in order to meet housing density targets required due to the Area of Intensification designation.</p> <p>As a result of this it pays no</p>

Christopher Chadwick/Friends of Priory Park				
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				<p>need to protection of views from the High Street to Alexandra Palace over the Hornsey Washhouse and Baths Building and refuses to see value in the Baths Building. As part of Site Allocation DPD for Hornsey Depot I requested this view be mentioned under Local Views. This should be one of the “protected local views” that are proposed for the Conservation SPD</p> <p>The key error in the framework document that has led to this situation is at Fig 1 showing the area in question, which is an out of date map. This map still shows the Depot Site, adjoining Sainsbury owned land and the Water Works Site as available land. An inherent assumption carried forward from the original 1997 planning application (HGY 54087) / June 2000 planning permission, which envisaged a supermarket fronting the High</p>

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				<p>Street with a 230/210 space car park behind. The car park was to be accessed via an entrance at Cross Lane Well House, with a new access road cutting across the waterworks land. A similar route is indicated in figure 12 illustrative development concept, which shows the proposed main route into Hornsey Depot Site going through the New River Village area.</p> <p>In fact by the time of the April 2005 document (the original planning permission would have expired in June 2005), development of New River Village was already well underway. For what one can only assume to be poor planning control and a breakdown in relationship with St James / Berkeley Homes (NRV developers) the access route through the New River Village was lost / is now more problematic.</p>

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18/1/6.3 & 18/2/6.3	6.3.12 Open Space and Biodiversity	<p>SP13 seems not to allow for the extension of Green Belt or Metropolitan Open Land and the protection of Green Belt seems stronger than the protection of MOL.</p> <p>We believe this change is important as it gives flexibility to the Core Strategy for opportunity to apply for upgrading of protection.</p> <p>Priory Park should be upgraded to MOL.</p> <p>This upgrade could be achieved either by a separate designation for Priory Park or adding it to number 5 on the Schedule 9 list of</p>	<p>The Council proposed a change to the first bullet point of SP13 to read:</p> <p>“All new development shall: Protect, enhance and, where applicable, extend the existing boundaries ...”</p> <p>The Council considers that the addition of “where applicable, extend” addresses this objection.</p> <p>Current position (June 2011): Policy SP13 has been written to be compliant with national guidance PPG17 (Planning for Open Space, Sport and Recreation), PPG2 (Green Belt) and PPG9 (Biodiversity and Geological Conservation). It also complies with the provision of regional policy in the form of the London Plan and its relevant policies. The Council considers that the Core Strategy affords equal protection to Green Belt and MOL. Paragraph 6.3.11 of the Core Strategy does state that MOL receives the same presumption against development as Green Belt land. No further change</p>	<p>I do not see how the Annual Monitoring report affords the opportunity for a review of MOL. I would concur with the statement by the HFRA who said in their official response, 25th June 2010: <i>‘We have not commented on the proposed changes to the UDP Map as it has not been submitted / revised as part of the three documents we have been asked to comment on. However, it should be amended to include any of the relevant points made in response to the draft CS [Core Strategy] or Sites or DMP eg about upgrading green spaces to higher status wherever possible.’</i></p>

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		Metropolitan Open Land. This currently consists of Highgate Wood, Queens Wood, Shepherds Hill Allotments and Crouch End Playing Fields.	<p>proposed.</p> <p>The Council did not undertake a review of its existing open space designations for the Core Strategy. The Council produces an Annual Monitoring Report every December which assesses the performance of its planning policies and other policy documents, including monitoring any net loss of designated open space. Through this process the Council will identify the need to reassess or review any policies or approaches. Reviewing open space designations maybe one of these approaches. No further change proposed.</p>	
18/2/6.3	6.3.12 Open Space and Biodiversity	Priory Park should be redesignated from Significant Local Open Land to MOL - Friends of Priory Park believe there is a strong case for the upgrading of our park from Significant Local Open Land to Metropolitan Open Land in accordance	<p>The Council do not consider that Priory Park fulfils the criteria for MOL as set out in the London Plan.</p> <p>Current position (June 2011): This remains the position of LBH.</p>	We consider that it does for the specific reasons given.

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		with the criteria for MOL stated below, and respectfully request that it is in fact upgraded.		
18/2/6.3	6.3.12 Open Space and Biodiversity	Priory Park is part of a green chain in that it links to Crouch End Open Spaces (designated MOL) via a "green link" of back gardens (between Park Avenue North and Barrington Road). It is similarly linked to Alexandra Palace Park via Priory Common and gardens.	Priory Park does not form a green chain in the way that other MOL designated land does. There is a very distinct urban separation between Priory Park and Alexandra Palace Park. If the Council were able to use back gardens and links within a chain, every open space in the borough would form part of a green chain.	<p>"A key objective of Green Chains is the establishment of extended publicly accessible routes (such as footpaths, cycle routes and bridle paths) which enhance the value of public and private open space within urban areas to local communities, and London as a whole.</p> <p>Within the last year the footpath to Park Avenue South at the Abbeville Road exit to Priory Park, Park Avenue South and Park Avenue North have been designated a "Greenways" route (part of link 4 Highgate to Wood Green). This provides a Green Chain (i.e. publicly accessible route) between the MOL of Alexandra Palace and Park and Priory Park. (Carrying on Park</p>

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				<p>Avenue South to the Park Road end brings you to the public footpath to Queens Wood across Crouch End Open Spaces which is also MOL). Priory Park can therefore be said to be part of a Green Chain”.</p> <p>The main link identified here is the one to Crouch End Open Spaces. The Alexandra Palace via Priory Common and gardens is also mentioned in support as Priory Park is part of a matrix of green space linking 2 separate MOL's with routes between for birds, bats and other wildlife.</p> <p>I will bring Google maps to the hearing to illustrate this point (a picture paints a thousand words)!</p>
18/2/6.3	6.3.12 Open Space and Biodiversity	<i>It contributes to physical structure by being clearly distinguishable from built up area</i>	The view from Priory Park to Alexandra Place can be more appropriately preserved by listing this view as one of the “protected local views” that are proposed for the Conservation SPD which is expected to be	We welcome the proposal for additional protection for the view via this route. However, the original point in terms of satisfying the MOL criteria

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		One of the best views in the area of Alexandra Palace obtained from the centre of Priory Park. A sense of continuing open landscape to the Palace is obtained as a result of community trees (gardens and tree lined streets) between the park and the base of Alexandra Palace Park (designated MOL).	produced some time in the medium term. However the Council intend to produce a preliminary List of Significant Local Views for public consultation in the shorter term and will include this in the potential views to be considered. The intention to produce a Conservation SPD and before that a preliminary List of Significant Local Views will be referenced in the forthcoming DM DPD.	remains. A key element of this view and sense of continuity is the hedgerow which runs between the bowling green and tennis courts. The Council recently proposed to remove this as part of tennis court development which shows the need for stronger protection than SLOL. Evidence: February 2011 Friends of Priory Park Response to London Borough of Haringey Consultation Documents: Priory Park Tennis Briefing 24 December 2010; Prior Park Tennis Briefing 27 January 2011
18/2/6.3	6.3.12 Open Space and Biodiversity	<i>it is land which includes open-air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or</i>	The importance of both the Crouch End Fun Run (and the Festival that runs alongside it) and Carters Steam Fair are acknowledged. While both events draw an audience that goes way beyond the borough, the Council does not accept that this is sufficient grounds for designating the Park as MOL. In the instance of the Fun Run/Festival, local press (Hornsey	We have clearly demonstrated recreation (Carters steam fair), sporting (10k & fun run) and cultural (Festival & Carnival) activity that serve significant parts of London (& beyond) so find the LBH response rather mean spirited.

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		<p><i>significant parts of London.</i></p> <p>It holds important community events during the year including for the last 20 years the Crouch End 10k and fun run which attracts thousands of entries (including many from outside the borough) and which is one of the largest community events in North London.</p> <p>Priory Park is second only to Finsbury Park (designated MOL) in the borough in terms of number of visits despite being only a fraction of the size.</p>	<p>YMCA webpage at http://www.ymcahornsey.org/modules/funrun/) acknowledges that 1000 runners took part and that the Festival is part of the "local calendar". Any running event that fields a prize is likely to have attendance that exceeds local participation and extends to club runners within the capital and even beyond. Most 10km races, including the Crouch End Fun Run are detailed in dedicated running magazines and elite runners travel the country to participate in these events. Attendance at the Fun Run however confirms that the majority of runners are local families (adults and children).</p>	<p>As additional evidence I am submitting a breakdown of entrants to the 10k & Fun Run by postcode and borough.</p>
18/2/6.3	6.3.12 Open Space and Biodiversity	<p>The annual visit of the popular Carters Steam Fair in the park is timed to coincide and anchor</p>	<p>Carters Steam Fair travels up and down the country and always locates on local open space. Again, this does not provide strong grounds or criteria for including Priory Park in the capital's list of MOL.</p>	<p>Whilst the fair may not provide strong grounds for MOL in itself we are looking at a cumulative effect of grounds. (see above)</p>

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		the important community centred Hornsey Carnival which draws entries from across London and beyond.			
18/2/6.3	6.3.12	<p><i>It is land which contains features or landscape of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level</i></p> <p>The park has origins as Victorian Pleasure Grounds, being laid out by Hornsey Urban District Council in 1894. The original eastern section of the park preserves much of its 19th and 20th century landscaping</p>	<p>The park is not included in English Heritage's schedule of listed buildings. The Historic Parks and Gardens Trust has an inventory of historic green spaces. In Haringey, only Finsbury Park and Alexandra Palace Park are recognised as historic parks. While the Council accepts that the park may have origins as a Victorian Pleasure Ground and contains historic fountains, the Historic Parks and Gardens Trust did not consider that the Park was worthy of inclusion in the inventory of historic green spaces.</p>	<p>We are not applying for inclusion in the inventory of historic green spaces or schedule of listed buildings. We are simply pointing out that the park DOES have origins as Victorian Pleasure Grounds and has historic fountains. The fact is that the Grade 2 listed former St Paul's Cathedral Churchyard fountain clearly is a feature of value at metropolitan level. (see below)</p>	

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		to this day with well maintained bedding displays, serpentine walks, perimeter shrub beds, mature silver birches, plane trees and an attractive area of mixed tree planting.			
18/2/6.3	6.3.12	The Park contains two Grade II listed fountains of historic interest. One is a 50 ton speckled grey Cornish Lamorna granite display fountain. This was moved from St. Paul's Cathedral Churchyard in 1909 and located on what was the Central flowerbed of the Pleasure Gardens. It was a gift from the Corporation of London and has a two foot carved City		The Grade 2 listed former St Pauls Cathedral Churchyard fountain clearly is a feature of value at metropolitan level. (see above)	

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		of London coat of arms. The other fountain is the Metcalfe Memorial drinking fountain which was originally located in the centre of Crouch End being moved to the Pleasure Grounds in 1895.			