Alexandra Park and Palace Conservation Area Advisory Committee

Haringey Local Plan consultation March 2015

Submission from the APPCAAC – comments relating to the following:

Part 1 - Site Allocations

SA 48: Hornsey Water Treatment Works (Page 130)

1. This is s sensitive site within a conservation area, bordering onto Alexandra Park, MOL and the north-south ecological corridor formed by the New River/ railway embankment. While the site offers the potential for improved pedestrian access via the Penstock footpath to Alexandra Park, any opportunity for housing development on this site should be resisted. The site also borders to the south onto high density housing, which needs to retain open space provision and not to lose it.

2. The landowner's claim that the two filter beds are now surplus to requirements needs to be treated with caution. In the past Thames Water sold for development the land now occupied by New River Village because it was seen as surplus to their needs. When it became apparent that their needs changed, TW had to build its new water treatment plant on some of the filter beds adjoining the reservoir, and these buildings now degrade the view from Alexandra Park and Palace. Any further requirement for TW to modify its operations on this site could be compromised by any short term decision to dispose of these two filter beds.

3. The APPCAAC is opposed to housing or other building development on this site.

SA 55: Alexandra Palace (Page 144)

1. The site considered here comprises the whole of Alexandra Park, including the Palace – all of its 77.5 hectares. Ownership of the site is indicated as being "unified public ownership", just as if it is the same as any other council owned site. This is crassly misleading!

2. The whole of Alexandra Park and Palace (the site) is owned under trust law by the Alexandra Park and Palace Charitable Trust. What is permissible or not permissible by way of development within the site is determined by act of parliament, the Charity Commission and planning law, not by deliberation of the Haringey Local Plan.

3. Haringey Council may have been appointed in law as trustee for APP, but it does not own it. The council exercises its charitable responsibilities through a board of appointed trustees – the beneficiaries of the charity being the general public. The

board has not been consulted over the inclusion of Alexandra Palace in the Proposed Site Allocations document.

4. Although the text used to describe the site requirements and development guidelines is not objectionable, it has no validity. It looks as if the author of the document was either misinformed or ignorant of the actual ownership of the site and Haringey's degree of freedom for development of it. Alternatively, if it is kite-flying to introduce the idea that some form of development might be considered, then it is misconceived.

5. The site more than "lies within" the Conservation Area, it defines it, which restricts the scope of developments that might be considered. Similarly, it is remiss that there is no reference to both the Park and Palace being listed by English Heritage as Grade II, that part of the Park is designated as a Historic Garden and that the whole of the land is MOL – all of which is significant.

6. The APPCAAC objects to the inclusion of this site in the context of the Proposed Site Allocation document and we ask for it to be withdrawn.

Sites in Wood Green Metropolitan Town Centre - Tall building clusters (page 40)

1. The proposal here is for tall buildings that may reach up to 25 storeys. The proposed site for one of these is at the Penstock foot tunnel - on the eastern side, close to the railway line. The claim is that it would be "signalling the connection between Haringey Wood Green and Alexandra Palace Park".

2. The CAAC considers that any tall building on this site would be intrusive in the view from the Alexandra Park and Palace Conservation Area. It would be prominently in view from the lower flat field area of the Park, where it would compromise the horizon. We question the real need for tall buildings in Wood Green, but the one proposed for this location is objectionable. The idea that it would "signal the connection between Wood Green and AP" is illusory.

3. The APPCAAC objects to a tall building at the Penstock tunnel location.

(Part 2 on next page)

Part 2 – Development Management Policies

Policy DM6 Locally important views and vistas (Page 12)

1. The APPCAAC welcomes the recognition given to the significance of locally important views, and the Schedule (Appendix C) and Map (2.3) of proposed Locally Significant Views to be protected.

2. The CAAC has earlier made submissions on these aspects of the Local Plan as part of the development of Strategic Policies 2013 - 2026 (formerly the Core Strategy). Chapter 6 of that document includes a section SP12 on Conservation – this relates to "Strategic and Local Views". Paragraph 6.2.19 states:

   The Council will seek to protect locally important views that contribute to the interest and character of the borough. These may include:

   - ***Views of and from large parks and open spaces, such as Alexandra Palace and Finsbury Park and other public parks on the Local Register of Historic Parks and Gardens;***

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

   - ***Views of listed and landmark buildings and monuments.***

3. The APPCAAC would like to see this important strand of agreed Strategic Policy included in DM6. We recommend that Paragraph 6.2.19 be included in full. This should become a new paragraph to be inserted after 2.33 on page 13.

Appendix A: Schedule of Locally Significant Views (page 99)

1. The CAAC welcomes the inclusion of this schedule of locally significant views. We particularly welcome the listing of views of Alexandra Palace from various points within and outside Haringey. All of these views are derived from the "2014 Urban Characterisation Study", of which we have not previously been aware.

2. In addition to the ten linear views of AP that are listed in the draft, the CAAC proposes the following additions:

   - Ferme Park Road ---→ AP
   - Dukes Avenue ---→ AP
   - The Avenue (N10) ---→ AP
   - Muswell Hill Road -→ AP

(End of submission).

Colin Marr (Chairman APPCAAC) 26 March 2015