

Alexandra Park and Palace Conservation Area Advisory Committee

Wood Green Area Action Plan - Consultation March 2017

Submission from the APPCAAC

The APPCAAC welcomes the opportunity to comment on the Wood Green Area Action Plan (Preferred Option) Consultation published in February 2017. The CAAC has considered the proposals contained within the draft plan and submits the following comments.

General

1. The APPCAAC's remit is the designated conservation area, defined by the boundaries of Alexandra Park. The CAAC's primary concern is to protect or enhance the character, appearance and heritage significance of both Alexandra Park (a grade II registered park) and the Palace (a grade II listed building). The Wood Green area forms the eastern boundary of the Conservation Area. Clearly, whatever developments are planned for the area to the east of the Park will be of interest to the CAAC and our concern is to minimise any negative impacts.
2. In addition to Conservation Area status, the area is also classified as Metropolitan Open Land (MOL) and this classification covers Alexandra Park as well as the area between the Park and Wood Green, including the Filter Beds. MOL status confers an equivalent level of protection as if it were Green Belt land.
3. We endorse the views already submitted by the Hornsey CAAC, which has drawn attention to requirements of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, requiring that special regard should be paid to the desirability of preserving the setting of listed buildings and preserving or enhancing the character or appearance of conservation areas. We also draw attention to the need to respect the setting of heritage assets, including Conservation Areas and listed buildings and structures set out within chapter 12 of the NPPF. The legal judgement in the case of *Barnwell Manor Wind Energy Ltd.* makes clear it is the duty of local planning authorities to protect the character of conservation areas and to safeguard the settings of listed buildings.
4. The CAAC is concerned that some aspects of the AAP do not pay sufficient regard to the above considerations and our concerns about this give rise to the following objections.

Spatial Vision

5. Chapter 5 of the AAP is concerned with Spatial Vision. Figure 5.1 on page 55 shows a map to indicate a "New Primary Route" running east-west across the

borough. This map is repeated in Chapter 7 where it is described as a key route connecting Wood Green High Road with Alexandra Palace.

6. While the CAAC welcomes the idea of strengthening access and links with Alexandra Park and Palace, we believe the reality of this east-west route has been overstated. Crucially, this link depends on access via the Penstock Tunnel under the East Coast Mainline Railway and this will only ever be for use by pedestrians and cyclists. The tunnel may be amenable to improvements from better lighting and cosmetic treatment, but it is unrealistic to think that it could be widened or enhanced to make it a “New Primary Route” and it is disingenuous to present it in this way.
7. Chapter 7, Policy WG6 is to do with Tall Buildings and Local Views. The CAAC welcomes the parts of the policy that underline the importance of the views of Alexandra Palace from various points in Wood Green, particularly from high viewing points and other public spaces at ground level, e.g. the Town Square. We believe these visual links are important, but it is regrettable that in the recent past their significance has been ignored. Evidence for this can be seen in recent approvals for schemes at Smithfield Square, Hampden Road and the outline plan for Haringey Heartlands, where views of Alexandra Palace from public realm viewpoints have been obscured.

SA 25 Filter Beds

8. The Filter Beds and the adjacent reservoir are on the western side of the railway line on land designated as MOL, which is the urban equivalent of green belt. This is the first time that this site has been proposed for development and the CAAC objects strongly to its inclusion now. We regard it as entirely improper for the AAP to anticipate de-designation of MOL status and we argue for a more imaginative use of this land that respects its environmental significance.
9. It is perhaps significant that the site wasn't included in the most recent phase of Haringey's Local Plan, where the Sites Allocation DPD, which was validated as recently as August 2016, makes no reference to it. Its inclusion now in the AAP suggests it was a last minute and perhaps ill considered addition.
10. It is salutary to look back at the outline planning application for Haringey Heartlands; a scheme that is embraced by the current AAP. When the Heartlands plan was approved for 1080 units in 2012 it was acknowledged there was a serious shortfall in open space provision. The Haringey Open Space & Recreational Standards SPD called for 33,000 square metres, whereas the plan provided for only 12,900 square metres – about 1/3 of what it should have been. To compensate for this shortfall there was to be a S106 (now CIL) charge for improvements to the Penstock Tunnel for easier access to the open space of Alexandra Park. At the time of approval, this was seen to be a woefully inadequate measure to compensate for a serious shortcoming of the scheme.

11. The AAP now envisages 3512 units from the Heartlands sub-area, which is three times the original Heartlands scheme and at the same time exacerbates the open space problem by proposing to build on the Filter Beds, which is currently open space land! This is not only compounding the problem, it is putting Alexandra Park open space even further beyond reach.

12. If the Filter Beds are no longer required for operational reasons, rather than build on them, it would make more sense to develop this site as recreational open space with relatively easy access via the Penstock Tunnel. This would go some way to compensate for lack of open space provision in the core of the sub-area development itself. A further attractive consideration here would be to theme the space as recreational wetlands alongside the reservoir, which would also work well with the ecological north-south corridor following the New River and railway embankment.

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29 March 2017