



24th March 2017

Local Plan Consultation
Planning Policy
Haringey Council
River Park House
225 High Road, Wood Green
London N22 8HQ

Wood Green Action Area Plan – WG SA 25: Hornsey Filter Beds

The starting point for our comments is the location of the Filter Beds both within and adjoining two conservation areas, i.e. the Hornsey Water Works & Filter Beds Conservation Area and the Alexandra Palace and Park Conservation Area. The site is also near to a number of listed buildings and structures. National legislation indicates that **special attention** (my emphasis) should be paid to the desirability of preserving or enhancing the character or appearance of the conservation areas and that there is a need to respect the setting of the listed buildings and structures. This duty to protect heritage assets is further set out in the National Planning Policy Framework issued in 2012 (Section 12). Local planning policies similarly seek to protect the character of conservation areas and to safeguard the settings of listed buildings. The judgement of the courts in the case of *Barnwell Manor Wind Energy Ltd.* makes clear the significance of these matters.

The Water Works & Filter Beds Conservation Area covers a wide area between Hornsey High Street and Alexandra Palace station. It has never to our knowledge been the subject of a Character Appraisal, but presumably the common feature of the land within it at the time of designation was the link with the New River and the associated water-related activities. However, the Conservation Area was fragmented by Haringey Council's decision in the 1990s to approve the construction of the New River Village on what was by then disused Thames Water land to the south of the Penstock Path. This now effectively separates the Filter Beds and reservoir at the northern end of the Conservation Area from the historic structures closer to the High Street. Within the area now proposed for development (at the northern end) are modern water works buildings of a high standard and disused filter beds of some historic interest.

It has long been our view that the part of the Conservation Area to the north of the Penstock Path should be added to the Alexandra Palace and Park Conservation Area and that the remainder, with the possible exclusion of the New River Village – which is arguably not worthy of conservation area status – should be added to the High Street Conservation Area. We believe that it would be sensible to do this in the near future. In our opinion the Filter Beds and reservoir are more closely related to the Palace and Park than to the New River Village. Indeed they share a long common boundary. The Council's stated aim of integrating the Filter Beds with the Palace also supports this view. For this reason we consider that the impact of the

proposal on the Alexandra Palace and Park Conservation Area is more significant than its impact on the section of the Filter Beds Conservation Area to the south of the Penstock Path. We trust the Council will pay attention to the views of the Conservation Area Advisory Committee for the Palace and the Friends of Alexandra Palace.

We have no objection in principle to erection of housing on the Filter Beds. However, it is clear that views from both the Park and the Palace itself must be protected in any development. Accordingly the height of any proposed housing is critical. We note that the Woodberry Down development in Hackney, to which the Council makes reference, contains buildings of a considerable height, and in our opinion the Council must make clear that such developments are not appropriate here.

We consider that a maximum of three storeys should not be exceeded, since the modern waterworks buildings on the site are not of a greater height. The Council's approval of the appalling Smithfield Square scheme, whose full extent is now evident when walking around the area, causes us great concern. A similar disaster should not be repeated at the Filter Beds. If the height of any new development on the Filter Beds is restricted to a maximum of three storeys, as we suggest, we consider that the impact on the extended High Street Conservation Area that we propose would not be significant.

A matter of potential concern to local residents must be access to the site. A development of 304 residential units, as suggested, would generate a considerable volume of traffic. It is not clear whether this traffic would travel through the New River Village to the traffic light-controlled junction with the High Street or emerge via Newland Road onto Nightingale Lane. The latter is already heavily used and contains a popular Primary School. It is also the eastern edge of the Campsbourne Cottage Estate Conservation Area.

No doubt the residents of the New River Village will have a view on additional traffic passing through their estate, given the known increase that will come from the Smithfield Square scheme. We note that when the modern buildings within the Filter Beds were constructed some years ago, a temporary road was constructed to minimise disturbance. Some clarification of the matter is urgently required before local residents can make an informed judgement on this point.

There are other issues which will need to be considered – not least the present designation of the site as Metropolitan Open Land and the impact of any development on nature conservation, but we rely on other parties to make representations on these matters.

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Secretary
Hornsey Conservation Areas Advisory Committee