



FAO: Planning Department,
Haringey London Borough Council

Ref: HGY/2022/4381
Date: 24/02/2023

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: Alexandra Palace, Alexandra Palace Way, Wood Green, London, N22 7AY.

Built Heritage Advice pertaining to an application for: Advertisement Consent for installation of variable message signs and parking tariff information signs at Alexandra Park & Palace, as part of the introduction of a new parking management system.

The proposed development site (the Site) is within located within the Grade II listed Alexandra Palace Registered Park and Garden (List Entry Number: 1001253), within the curtilage of the Grade II listed Alexandra Palace Including Former Alexandra Palace Station to North (List Entry Number: 1268256), and within the Alexandra Palace and Park Conservation Area.

In statutory terms the significance of the heritage assets has been recognised by their designation as a Grade II listed building and a conservation area, which reflects their 'special interest'. The Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act 1990) states that Local Planning Authorities have a statutory duty to 'have special regard to the desirability of preserving the [listed] building or its setting or any features of special architectural or historic interest which it possesses' and to ensure that 'special attention shall be paid to desirability of preserving or enhancing the character or appearance of that [conservation] area.'

Furthermore, Paragraph 199 of the National Planning Policy Framework (NPPF) states:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Insufficient information has been provided regarding the contribution the Site makes to the conservation area and to the setting of the identified heritage assets, contrary to Paragraph 194 of the National Planning Policy Framework (NPPF). Any scheme which has the potential to affect the significance of a heritage asset should be informed by an adequate heritage baseline. This is a requirement of the NPPF and is also good practice to ensure a high-quality scheme is realised.



Paragraph 194 states that:

*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. **The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.** As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*

The following publications and advice notes from Historic England are useful guidance:

- Historic Environment Good Practice Advice in Planning 2: Managing Significance in Decision-Taking in the Historic Environment
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets – (Second Edition)
- Historic Environment Good Practice Advice in Planning 12: Statements of Heritage Significance

Crucially no existing plan has been provided showing what, if any, signage exists on the Site. As such, it is not possible to fully assess the impact of the proposals on the designated heritage assets or assess any potential cumulative impacts.

Furthermore, no information regarding the posts and bollards has been provided; details of the design, including finish colour, and materiality of the signposts should be provided. Should the signs be fixed to existing infrastructure, details of this should be provided. Additionally, details of the height of the signs are required to assess the impact on the views to and from the designated heritage assets.

Notwithstanding the above, and taking into account the requirement for managed car-parking, the quantity of proposed signs appears excessive; this would result in a visual clutter that would detract from the listed building and would have an adverse visual impact on the designated heritage assets. As such, the proposals are considered to constitute a scheme which would result in less than substantial harm to the listed building, making Paragraph 202 of the NPPF relevant. Furthermore, no clear and convincing justification for that harm has been provided, contrary to Paragraph 200 of the NPPF. Consequently, the proposals will fail to preserve or enhance the character and appearance of the Alexandra Palace and Park Conservation Area, contrary to Paragraph 206 of the NPPF.

The harm may be partially, though not wholly, mitigated by greatly reducing the quantity of signs and amalgamating clusters of signs.

It is not possible to support the proposals as they are in conflict with Paragraphs 194, 199, 200, 202, and 206 of the NPPF, and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Yours sincerely,

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Historic Environment Team
Place Services

Note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter