



Head Of Planning & Building
Planning Department
Harringay Council
Civic Centre
High Road
Wood Green
London N22 8LE

TP/LNE/2021-040

29th March 2023

Dear Sir/Madam,

Request for Prior Approval to material alteration to Alexandra Palace railway station (Access For All scheme)

Please find enclosed the necessary plans and specifications relating to the installation of lifts and new staircases and access ramps to provide step-free access at Alexandra Palace railway station.

This project is part of a programme developed by the Department for Transport (DfT), Mobility and Inclusion Unit. The work is being managed by Network Rail on behalf of the DfT, who provide the funding, have chosen the station and have defined the scope of the works.

The Department for Transport (DfT) has specified that the objective of the project is to achieve an unobstructed and obstacle free 'accessible route' from at least one of the station entrances to each platform and between platforms served by passenger trains.

The DfT measures an 'accessible route' as one sufficient for a manually self-propelled wheelchair user to negotiate. Where reasonably practicable, the works are designed to comply with the "Code of Practice for Train and Station services for disabled passengers" and all relevant safety and technical standards.

Because of its high level of patronage Alexandra Palace station has been identified as a station where the provision of lifts is justified.

The proposed works at Alexandra Palace Station have been designed to create an inclusive station for passengers by creating accessible step free access from the station entrance on Buckingham Road to the four platforms and between them.

The existing station runs South to North, with four platforms located in a cutting with the station building located at the top of the cutting to the east, connecting to Buckingham Road. The station building and cutting to the north of the existing bridge lie within the Wood Green Common Conservation Area. A public highway borders the site to the east and west with residential properties, commercial properties and parks on the opposite side of the roads. To the west of the station is Alexandra Park and Alexandra Palace, approximately 100m and 700m away respectively. To the east of the site Avenue Garden park is approximately 10m away. The outlook and relationship of each of these sites was carefully considered during the design of the layout, enhancing the relationship between them.

The proposal is to add three new 16 person through lifts to serve Platform 1, Platform 2 and Platform 3 & 4 (double facing island platform). The platform 1 lift will be served by a walkway 8 metres long (with motor room beyond as a separate structure) running north from the bridge over the existing switchroom; the lifts serving platforms 2, 3 & 4 are directly attached to the existing footbridge. The motor room to platform 2 will be detached and further up the platform; the motor room to platforms 3 and 4 will be under the landing.

It is proposed that the steel frame lift shafts are clad using a single skin brick, up to bridge deck level and Trespa cladding panels (or similar) on the remaining structure. The facing bricks are to match as close as reasonably possible the bonding, size, colour, texture and mortar of that of the existing buildings, though this can be the subject of a condition attached to the Prior Approval. The cladding panels on the upper sections of the lifts are to tie in with the proposed bridge to create a homogeneous design. All lift entrances are proposed to have a cantilevered lift canopy with clear, UV protected polycarbonate cladding, covering the lift landing area.

The lift machine rooms are proposed to have an insulated cavity wall clad with bricks which match as close as reasonably possible the bonding, size, colour, texture and mortar of that of the existing buildings.

The existing staircases on platform 1 & 2 are to remain and undergo modification and refurbishment works to make good. These works including stripping off the existing surfacing and treads and shot-blasting the remaining steel structure to enable repainting and re-treading. The existing staircase on platform 3 & 4 is to be removed and new steel staircase constructed.

To gain access to the footbridge from the station building, stepped and ramped access is proposed. The stepped access has two flights of stairs with a clear width of 1800mm and ramped access has 5 flights with a clear width of 1800mm.

Proposed passenger access route

To access the platforms from Buckingham Road the accessible route consists of the following:

Pass through the automatic sliding doors with a proposed opening of 1800mm to be confirmed at detailed design.

Travel up compliant ramp to concourse level with minimum clear width of 2000mm.

The ticketing facilities, station café and ticket barriers are located in the station concourse and located on the access route.

No modifications to the existing ticket barriers are proposed, maintaining the 3 barriers, 2 standard barriers and a barrier of increased width for persons of reduced mobility.

Once passengers pass through the ticket barriers, they exit the station building onto the step and ramp landing area. The automatic swing doors are proposed to have a clear width of 2000mm.

The bridge deck provides level access across the rail lines to lifts and staircases serving each platform. The bridge deck is proposed to have a clear width of 3685mm between handrails with 1.8m high parapets either side.

All lift to each platform is proposed to be a 16 person through lift and stairs are to be compliant to current standards. The stairs to platform 1, 2, 3 & 4 have a clear width of 2200mm, 1550mm and 1800mm respectfully.

Works are proposed to the station building on Buckingham Road to provide compliant access into the station concourse area and onto the footbridge. These works include removing the existing bin store and cycle rack and constructing an internal access ramp. These works include constructing a new entrance by removing the two existing access doors and installing automatic sliding doors to maximise passenger flows through the existing building.

The café in the station concourse area is to remain with no alterations required. However, to provide ramped access from Buckingham Road into the station concourse and to provide compliant access from Bedford Road into the station building it is proposed that the existing cycle racks, bin stores and ticket machines are removed and relocated, and an internal ramp constructed from pavement level on Buckingham Road to an internal surface level within the station concourse area, removing the existing stepped access arrangements.

Two flights of ramps are proposed with a clear width of 2000mm between handrails with firm, slip-resistant surfacing. The ramp is to have a guardrail at station concourse level.

The existing two entrance doors are proposed to be removed along with intermediate supporting column and replaced with automatic sliding doors with an 1800mm opening. A beam is proposed to support the retained arches. The taxi booking window present within the building is to be filled in so as to not impede the flow of passengers entering and exiting the station.

A localised rear platform extension is required on platform one to accommodate the re-located waiting shelter. The extension will tie into the existing suspended platform structure with matching rear of platform fencing to suit.

The cycle rack and bin stores proposed to be removed from the station building are to be relocated as shown indicatively on drawing 200011.

Please find enclosed the following plans:

167190-NRD-ECM1-AAP-DRG-ECV-200003 Existing pedestrian route from Buckingham Road

167190-NRD-ECM1-AAP-DRG-ECV-200004 Existing pedestrian route from Bedford Road

167190-NRD-ECM1-AAP-DRG-ECV-200007 Existing Elevations

167190-NRD-ECM1-AAP-DRG-ECV-200008 Existing Sections

167190-NRD-ECM1-AAP-DRG-ECV-200011 Proposed General Arrangement

167190-NRD-ECM1-AAP-DRG-ECV-200012 Proposed General Arrangement to station building

167190-NRD-ECM1-AAP-DRG-ECV-200013 Proposed West Footbridge Extension (partial)

167190-NRD-ECM1-AAP-DRG-ECV-200014 Proposed Lift & Landing Structure Plat 1

167190-NRD-ECM1-AAP-DRG-ECV-200015 Proposed Lift & Landing Structure Plat 2

167190-NRD-ECM1-AAP-DRG-ECV-200016 Proposed Lift & Landing Structure 3 & 4

167190-NRD-ECM1-AAP-DRG-ECV-200017 Proposed Staircase Replacement 3 & 4

167190-NRD-ECM1-AAP-DRG-ECV-200018 Lift & Motor Room Elevations I
167190-NRD-ECM1-AAP-DRG-ECV-200019 Lift & Motor Room Elevations II

Location Plan (1:1250)
Extract from 1845 Railway Clauses Consolidation Act
Arboricultural Impact Assessment

Planning consent for the structure has already been given by virtue of Part 18a to Schedule 2 of the Town & Country Planning (General Permitted Development) Order 2015, subject to certain conditions.

I would draw your attention to the provisions of Part 18a which states that permitted development applies when it is “authorised by (a) a local or private Act of Parliament (i.e. the original Act of Parliament that allowed the construction of the railway).....which designates specifically the nature of the development and the land upon which it may be carried out.” Development is not permitted (for specific items identified, such as buildings or bridges) ...”unless the Prior Approval of the appropriate authority to the detailed plans and specifications is first obtained”. However the Prior Approval is...”not to be refused...nor are conditions to be imposed unless they are reasonably satisfied that - (a) the development....ought to be and could reasonably be carried out elsewhere on the land; or (b) the design or external appearance of any.....bridge or building....would injure the amenity *of the neighbourhood and is reasonably capable of modification to avoid such injury.*”

The original Act specifying this stretch of railway states that the railway undertaker can, from time to time, alter, repair, or discontinue the before mentioned works or any of them and substitute others in their stead, and do all other acts necessary for making, maintaining altering, repairing or using the railway. This “general power” is provided for in Section 16 of the 1845 Railway Clauses Consolidation Act, and it is this Act which is incorporated in all railway Acts since 1845. Acts before 1845 have the equivalent wording embodied within the sections of the Act as appropriate.

The decision of the Court Of Appeal in *Emsley v North Eastern Railway Company* (1896) 1 Ch 418 confirmed that these powers are not restricted to the period of construction but can be invoked from “time to time”. The use of the original Act of Parliament as a means of using permitted development rights has also been upheld in a 2000 English Ministerial appeal decision, the reference number being APP/X/98/X5210/003059.

Therefore, the two tests to be applied are the siting of the structure and its design in terms of its impact on the amenity of the area.

In relation to the first test, this is axiomatic as the lifts can reasonably only be attached to the existing bridge structure, as to create a totally new footbridge would be prohibitively expensive requiring alternative access arrangements and significant removal of vegetation.

It then turns on whether the proffered design has any adverse impact on the amenity of the neighbourhood.

The bulk of the existing station and footbridge station is located outwith the Wood Green Common Conservation Area, although it is recognised the eastern end of the bridge and station building do lie within its boundaries. The Conservation Area appraisal mentions that:

“The strip of land to the north of the station, between the railway cutting to the west and Buckingham Road to the east, forms a green buffer zone between the busy main line railway tracks and the rest of the conservation area and continues the impression of an open space corridor from Alexandra Park through to Wood Green Common and Avenue Gardens by preserving views into and out of them. The mature trees and shrubs make a significant contribution to the setting of this part of the conservation area. At its northern end Buckingham Road turns westwards and crosses the railway line, whilst semi-detached dwellings define most of the opposite side of the road. Alexandra Palace railway station was built in the 19870s as an auxiliary station to serve the, then newly constructed, Alexandra Palace to the west. It is an attractive building of Gault brick with red brick banding, complementary in materials to the Palace that makes a positive contribution to the setting of the conservation area and to its character and appearance of low intensity of development.” (paragraph 4.4, page 10 of the Wood Green Common Conservation Appraisal, Harringay Council 2008)

The design has been chosen as adjuncts to the existing footbridge so as to maintain harmony with the overall appearance of the station and surrounding areas. The new lift towers will be visible from both Bedford Road and Buckingham Road, but as it is already an existing railway, it is quite properly viewed in the context of the existing station and is merely a further development of the latter. The impact on the conservation area is minimal, as the proposed works will result in only a minor effect to the outlook from the residential properties on Buckingham Road. Where the new ramp entrance to the station building is proposed, it will require works to remove some vegetation on the cutting slopes to accommodate the new structures. This impact will be reduced by planting appropriate replacement trees and shrubs where they have been disturbed or removed to accommodate the ramp. This small loss of tree cover has to be balanced against the benefits of a fully accessible station, as well as noting that the vast majority of the trees and existing iron railings would be retained, maintaining their contribution

to the character of this part of the conservation area. The lift shafts themselves would be designed to complement the existing station building

As planning consent has already been given there are no policy considerations to take into account; nevertheless, it is noted that the proposal would be entirely consistent with Policy SP7 of the Haringay Local Plan Strategic Policies DPD in delivering access improvements at the station (Alexandra Palace being specifically mentioned in the policy).

It is therefore considered that the material alteration to the station would not by reason of design be detrimental to surrounding amenity.

There are no other matters of acknowledged importance that should preclude the grant of Prior Approval. The Prior Approval process under Part 18a is a rare and unusual piece of legislation and is not to be confused with the prior approval process for agricultural buildings or telecommunications equipment (for example, there are no prescribed forms for a Part 18 Prior Approval); however, it remains the case that the applicant can appeal against non-determination if no decision has been made within 8 weeks of submission.

The Authority is aware of the Prior Approval process, as it was used to secure approval for the new platform 5 at Alexandra Palace in 2011 (see attached).

For the purposes of Part 18a the enabling Act in this instance is the ***Great Northern Railway Act 1914***, which incorporates the Railway Clauses Consolidation Act 1845. Section 16 of the 1845 RCC Act is enclosed for reference.

It should be noted that the scheme was the subject of pre-application advice (reference PRE/2019/0217) from planning officer Conor Guilfoyle along with a number of other Council representatives. However this was based on the original scheme which advocated a separate pedestrian footbridge between Bedford and Buckingham Roads; as much of the discussion surrounded concerns the Authority had over the new footbridge, these are no longer relevant given the second bridge has been removed from the proposals (again this is on grounds of cost to the taxpayer, as a scheme to retain the current arrangement has been deemed by the funder (DfT) to be more cost efficient whilst still maintaining the existing pedestrian access across the railway).

We therefore request the formal Prior Approval to the plans and specifications enclosed with respect to the provision of lifts and staircase alterations at Alexandra Palace station, in accordance with the provisions of Part 18a to Schedule 2 of the Town & Country Planning (General Permitted Development) Order 2015.

Please note no fee is prescribed in cases of Prior Approval under Part 18 of the Order.

Please let me know if you require any further information.

Yours faithfully

Tony Rivero
Town Planning Manager EM & LNE
Network Rail