



ENGLISH HERITAGE

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BY E-MAIL: ldf@haringey.gov.uk

7 March 2014

Dear Sir/Madam

**London Borough of Haringey Local Plan:
Site Allocation Development Plan Document (DPD) Reg 18 consultation**

Thank you very much for your letter consulting English Heritage on the Borough's Site Allocations Plan.

As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Accordingly English Heritage welcomes the opportunity to comment upon the Site Allocations Development Plan Document.

We have reviewed the document against the *National Planning Policy Framework* (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

English Heritage welcomes the many references within the document to the rich heritage of the Borough and the consideration given to these assets within the site allocation proposals. There are several sites where it may be useful to have the opportunity to provide further comments following discussion with you prior to the next consultation stage. In considering the plan our response would have been assisted by the identification of designated heritage assets on the site allocation maps, and also by clearer street names on the individual maps to facilitate identification of impacts. We suggest that these matters are addressed in the next version of the plan.

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As part of the process of taking the Site Allocations DPD to the next stage, we would encourage you to ensure that the potential archaeological interest of all sites is understood. The Greater London Archaeological Service, which is co-located with English Heritage, should be contacted for further advice.

Lastly, as mentioned in our response to the proposed Tottenham Area Action Plans dated 7 February, we recommend that Local Plan documents should identify heritage assets at risk, and incorporate consideration of their future repair and re-use as part of a positive strategy for the historic environment. We recommend that where sites include, or could impact on heritage at risk, that this should be a key consideration, in accordance with para 126 of the NPPF.

Our specific comments are set out in the attached schedule. We would be pleased to discuss these with you at a convenient time.

Yours faithfully

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English Heritage's detailed response to the Site Allocations DPD

Tottenham Hale Growth Area, p11

Very significant changes are proposed here. The impact of tall buildings should be considered very carefully in terms of both local effects and the impact on the wider townscape further afield. We note that some references are included under each of the sites to the preferred location of tall buildings; it would be helpful to refer also to any background analysis that applicants should refer to relating to views and local character/amenity.

We note three sites are identified as having archaeological interest: *Sites TH3: Station Square West; TH7: Hale Wharf and TH8: South Tottenham Employment Area*. In these cases we would like the need for archaeological assessment and potential provision for preservation of remains to be referred to in the Implementation considerations.

TH8: South Tottenham

The setting of Markfield Pumping Station (listed grade II) should be a consideration here. This is an example where marking designated heritage assets on the map would help clarify the context within which a development needs to be assessed. This would assist both those commenting on the plan during preparation, and users of the plan post-adoption.

Harringey Heartlands, p33

HH2: Chocolate Factory

The proposed development site borders Wood Green Common Conservation Area to the north which extends to within the same street block with a varied cluster of buildings forming the southern tip of the conservation area. These include the civic building at 109 Maynes Road, and the late Victorian Board school buildings making up Alexandra school. The context is also formed by the two storey Victorian development extending along Maynes Road which has some quality and, together with the Chocolate Factory, could justify consideration as an extension to the conservation area.

We recommend that the conservation area is marked on the site map, together with the adjoining listed buildings, and that these are referred to in the existing designations section. The Chocolate Factory has merit as a local heritage asset and we consider that the text should be strengthened to stipulate its retention, rather than indicating its retention as a preference. The contribution of the varied heritage of this block to the vitality of the cultural quarter is one of its strong points that can assist in integrating new development while maintaining a unique character and sense of place.

The form and scale of new development should relate well to this context and we suggest should not be uniformly 8 storeys to maintain variety. The relationship of the development to the school should be carefully considered.



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HH3: Clarendon Square

We note that there is an extant planning permission for this site. Notwithstanding this, the merits of the gasholders as a local heritage asset might be referred to in the description of the site and surroundings.

Wood Green Area of Change, p48

WG1: Civic Centre

As noted in the text, this site lies within the Trinity Gardens Conservation Area. We recommend that this is shown on the site map, together with the other designated heritage assets adjoining the site, the Church of St Michael and All Angels, listed grade II, and the adjoining Trinity Primary School and school house, also listed grade II. Reference to these should be included in the existing designations section.

The Civic Centre building dates from the 1950s and is designed in the Festival of Britain style. The building is well composed and could be considered to make a positive contribution to the character of the conservation area. We are concerned that the emphasis in the text, and design principles, infers that redevelopment through demolition is likely to be agreed. The starting point should be that the building will be preserved and enhanced, in accordance with s72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, and guidance in the National Planning Policy Framework (NPPF). In our view the second sentence of the Design Principles should be much stronger, and assert that the Council will seek retention of the Civic Centre building unless a clear and convincing justification for demolition has been made.

In addition, we recommend that the text should clearly reference the need for any development to address the adjoining listed buildings. This is especially relevant in terms of how development addresses the listed Board school to the rear.

WG6: Bury Road Car Park

The existing building on this site is relatively tall and is located in close proximity to the Noel Park Conservation Area. The ambitions for this site seem modest, and principally address ground floor uses. We would encourage you to consider what more could be done to improve the appearance of the building and its impact on the conservation area.

In line with other comments, we recommend that the presence of the adjoining conservation area is included in the existing designations section and on the site map.

WG7: Turnpike Lane Station

We strongly agree that the redevelopment of the existing listed station would not be acceptable. It would be appropriate to identify the listed building in the existing designations section and on the site map.



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North Tottenham/Northumberland Park, p64

NT2: Tottenham Hotspur Stadium

We note the existing approval for this site. There are significant heritage assets affected by the proposals and we look forward to further discussion regarding their conservation. We recommend that these assets should be referred to in the existing designations section. A reference to archaeological assessment may be suitable in the implementation section.

We note that the implementation considerations include a reference to the High Road West masterplan being incorporated into any future amendments. English Heritage has concerns regarding the heritage impacts of proposals for this site, as discussed below.

NT3: High Road West

Many of the buildings on the west side of Tottenham High Road date from C18 and C19 and are within the North Tottenham High Road Conservation Area. There should be a reference to these buildings making a positive contribution to the character and appearance of the conservation area and a presumption that they would be retained and enhanced as part of a larger scheme for the site. The Design Principles and Implementation considerations should address the heritage assets as one of the key elements that can integrate new development into the area and maintain local distinctiveness.

We note that the text refers to masterplan options being developed, and that all three options in the document *High Road Plan West* (available on the Borough's website) include the demolition of nos.731 to 759 High Road. The justification for the loss of these frontage buildings in the conservation area is not evident, and we would value the opportunity to discuss this proposal with you.

Tottenham High Road Area of Change, p75

THR1: The Roundway at Bruce Castle

The site is in close proximity to the Grade I listed Bruce Castle. We welcome the references to the castle and other heritage assets surrounding the proposed allocation. In view of the high significance of Bruce Castle it would be appropriate to expand the Design principles in terms of the supporting analysis of impact on the setting of the castle and its associated grounds.

THR3: Bruce Grove Snooker Hall

We note that the former public toilets are mentioned in the Design Principles section in relation to their re-use. It would be appropriate also to refer to their being identified as a listed building at risk, and to state in the Design Principles that new development should take account of their setting.

THR4: Tottenham Green Bus Garage

The bus garage is located in a highly sensitive position with some very significant heritage assets in close proximity, all of which have a strong townscape presence in the conservation area. The site lies partially within the conservation area. It would be helpful to show the designated heritage assets on the site plan, including the



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boundary of the conservation area. We recommend that these assets should also be listed in the existing designations section.

We welcome the references to the heritage assets in the description of the surroundings and in the Design Principles, although we recommend that the first sentence of the section should be more robust in terms of safeguarding and enhancing the setting of the conservation area and the Church of Holy Trinity (grade II listed).

Notwithstanding the consideration given to heritage assets in the text, we are concerned regarding the potential impact on these assets of road re-alignment through diversion of Philip Lane. This could result in an opening up of the existing spaces, the loss of conservation area buildings and an impact on the setting of Tottenham High Cross (listed grade II). We would welcome the opportunity for discussion on these proposals.

Muswell Hill, Highgate, Crouch End & Hornsey, p95

HG2: Highgate Magistrate's Court

The Design Principles should refer to the need to conserve the setting of the listed cattle trough and the conservation area. We recommend these are shown on the site map and included in the existing designations section. The Area of Archaeological Importance should also be referred to the designations and implementation sections.

HG4: Highgate Bowl

We would like to see a reference to the setting of the adjacent listed buildings on Highgate High Street and the Highgate Conservation Area. The views of Highgate village should be a consideration in the design principles. It would be helpful to include the designated heritage assets on the site map.

MH1: St Luke's Hospital Site

We welcome the statement that the statutorily listed building and the locally listed building will be retained. The buildings make a positive contribution to the surrounding conservation area and the design principles should reflect the need for any development proposals to preserve or enhance the conservation area.

MH2: 56 Muswell Hill

We welcome the reference to the retention of the public house. The setting of the Baptist church (grade II listed) should be mentioned, and the designated heritage assets identified on the site map.

HO1: Hornsey Depot

The Design Principles should refer to the fact that part of the conservation area is within the site, including the C19 pumping station, a building which clearly makes a positive contribution to the character and appearance of the conservation area.

HO3: Hornsey Town Hall

English Heritage has responded to recent proposals for this site. It would be appropriate to identify the Town Hall (listed grade II*) as a listed building 'at risk'. The repair and re-use of heritage assets at risk is encouraged as part of a positive



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strategy for the historic environment in local plans (NPPF, para 126). We recommend that the Crouch End Conservation Area and the three listed buildings within, and adjoining, the site (Broadway House, the Library and Town Hall) are identified on the site map, and in the existing designations section.

AP1: Alexandra Palace Station

We note that additional details will become available in relation to future Crossrail developments. We recommend that the heritage assets within, and adjoining, this area should be identified on the site map and in the existing designations section.

South of the Borough, p120

S1: St Ann's Hospital

The site area includes part of the St Ann's Conservation Area and a number of buildings and structures that make a positive contribution to the conservation area. These should be identified in the text and a reference made to the need to take account of their setting.

S5: Finsbury Park Bowling Alley

The Bowling Alley at Finsbury Park is of some architectural merit, with its Edwardian frontage, and may be a candidate for local listing. The designation of Finsbury Park as a registered historic park should be identified on the site map.



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