



ENGLISH HERITAGE

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7 March 2014

Dear Sir/Madam

**London Borough of Haringey Local Plan:
Sustainability Appraisal Scoping Report for the Site Allocations DPD and
Tottenham Area Action Plans**

Thank you very much for your letter consulting English Heritage on the Sustainability Appraisal (SA) scoping reports for the Borough's Site Allocations Plan and the Tottenham Area Action Plans (AAPs).

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 scoping reports.

Our specific comments relating to the scoping for both the Site Allocations DPD and Area Action Plans are set out below.

Section 4 Links to Plans, Policies and Programmes

Question 1 Are there any Plans and Programmes that have not been included which are relevant to the SA?

We have no additional documents to recommend for inclusion in the Plans and Programmes set out in Appendix A1. However, certain documents have been updated and require amended references:

- As you will have noted, the Practice Guidance accompanying the National Planning Policy Framework was published on 6 March 2014, and so now



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forms the relevant supporting document. The reference on page A-8 of Appendix A1 should be amended.

- English Heritage's guidance on Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment was updated in July 2013, building on the earlier 2010 guidance. The references to this document on pages A-14 and A-17 of Appendix A1 should be amended.¹
- The Heritage at Risk Register for London is published annually, the last edition is dated 2013. The register refers to all types of designated heritage assets at risk – listed buildings, conservation areas, scheduled monument, registered historic parks and gardens. The reference and the text on page A-17 should be amended accordingly.
- The Urban Characterisation Study referred to on page A-32 as being published in 2014 will be highly relevant to how the strategic sites identified in the Site Allocations Plan should be considered, and to the Tottenham AAPs.

Section 5 Baseline Information

Question 2 Baseline information – Are there any sources that have been omitted?

The Borough's Conservation Area Appraisals and Management Plans should be referred to as highly relevant to both the consideration of Strategic Sites and proposals being brought forward in the AAPs. The Urban Characterisation Study (p11, and Appendix A1, pa-32) will also be relevant to both types of plan.

5.18 Cultural Heritage and Townscape

The summary of the Borough's heritage assets is appropriate and we welcome the inclusion of references to Conservation Area Appraisals, Heritage Assets at Risk, and the strategic views and the wider setting issues relevant to Haringey. The draft Site Allocations Document does not refer to Alexandra Palace as a heritage asset at risk, or the plans for its future as set out here. This is an omission which we hope can be rectified at the next stage of the plan.

Section 6 Sustainability Issues and Objectives

Question 3 Do any of the sustainability issues and objectives in section 6 need to be added to or amended?

6.1 Sustainability issues and objectives

Historic environment, p27 – this section refers to objectives. The issue of how to address heritage at risk as part of a positive strategy for the historic environment should be included here (NPPF, para 126)

6.2 Specific Site Issues

We refer you to our response to the Site Allocations Plan in which we comment on the heritage issues for certain of the sites listed on pages 28 and 29 of this scoping report. We would draw your attention to our comments on Site NT3 Tottenham High

¹ SEA/SA and the Historic Environment 2013 can be accessed on the Historic Environment Local Management website at: <http://www.helm.org.uk/guidance-library/strategic-environ-assessment-sustainability-appraisal-historic-environment/>



Road West, and our concern that an alternative that does not require the demolition of conservation area buildings on the High Road should be included among options considered.

6.3 Sustainability objectives

We welcome SO12 which broadly covers cultural heritage interests within the Borough. It should perhaps be expanded to cover potential impacts of development on heritage assets outside the Borough. For instance 'Protect and enhance the Borough's townscape and cultural heritage resources and the wider London townscape'

Section 7 Sustainability Appraisal Framework

Question 4 Are the objectives and indicators set out in the SA Framework appropriate?

The indicators for the historic environment are suitable, although 12.2 is the least effective since the area of these heritage designations is unlikely to change radically, or to be indicative of anything significant. We suggest you refer to English Heritage's guidance note² for another indicator to replace this.

Section 8 Sustainability Report Structure

Question 5 Is the proposed structure and methodology of the SA report suitable?

We have no points to raise here.

I hope these comments are useful to you. This letter should be read together with our responses to the Site Allocations DPD and the Tottenham AAPs dated 7 March and 7 February respectively, in which both general and specific issues relating to the historic environment of Haringey are raised. Should you wish to discuss any of the points raised please do not hesitate to contact me.

Yours faithfully

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² Ibid

