

4th March 2016

Haringey Council

Local Plan Team
Planning Policy
Level 6
River Park House
Wood Green
N22 8HQ

By Email: ldf@haringey.gov.uk

Dear Sirs,

**HARINGEY LOCAL PLAN PRE-SUBMISSION RESPONSE REGULATION 19
CONSULTATION – TOTTENHAM AREA ACTION PLAN**

In conjunction with the owners of the Regency Banqueting Suite, please find attached:

- a.) Our representation comments made via the Council's formal Regulation 19 Response form in regards to the emerging Tottenham Area Action Plan
- b.) Supporting Evidence – Statement of Significance by Fuller Long Planning Consultants – FL10611

Yours Faithfully,

Nick Charalambous
Director
For and on behalf of
Empyrean Developments Limited

Ref: <big>(for official use only)</big>	Local Plan Publication Stage Response Form	
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Name of the DPD to which this representation relates:

Tottenham Area Action Plan

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

1. Personal Details ¹	2. Agent's Details	
Title	Mr.	
First Name	Nicholas	
Last Name	Charalambous	
Job Title (where relevant)	Director	
Organisation (where relevant)	Empyrean Developments Limited & The Regency Banqueting Suite	
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¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<u>5.76</u>	Policy	<u>BG3</u>	Policies Map	

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes ✓ No

4.(2) Sound Yes No

4.(3) Complies with the Duty to co-operate Yes ✓ No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Empyrean Developments with the owners of the Regency Banqueting Suite, which is one of the subject properties under this Site Allocation, has commissioned a Heritage Statement of Significant by Fuller Long Planning Consultants. Please refer to the report for more detail.

Empyrean would contest the Heritage value of the subject building. The Local Authority has overstated the merit of the Banqueting Suite. The property's Heritage value cannot justify the constraint on development the Council would take if this policy is adopted.

The constraint imposed would contradict policies both within the London Plan and within numerous other Haringey adopted documents, promoting high density schemes in High PTAL locations.

Empyrean has commissioned various massing studies which support 1018 Hab Rooms/ Ha on BG3 but acknowledges that density in a High PTAL location must be a design lead matter.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

The following paragraph should be amended from:

"The public toilets, entrance to the former cinema, and the Banqueting Suite frontage are significant heritage assets, and will be retained and brought back into active use."

To

"The public toilets and entrance to the former cinema are significant heritage assets, and will be retained and brought back into active use."

AND from:

"A sensitive additional storey extension to the Banqueting Suite will be acceptable where it can be demonstrated that it enhances the setting and character of the building, and the wider conservation area."

To

"Whilst there is a presumption in retaining the Banqueting Suite, a high quality design lead approach will warrant the demolition of the Banqueting Suite where it can be demonstrated that it enhances the setting and character of the building, and the wider conservation area."

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

[Large empty rectangular box for writing.]

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature

 Date: **4/3/16**

Statement of Significance

**Regency Banqueting Suite
110-116 Bruce Grove
London N17 6UR**

FL10611

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1.0 INTRODUCTION

- 1.1 This statement has been produced as part of a representation to the London Borough of Haringey by the owners of the Regency Banqueting Suite located at nos. 110-116 Bruce Grove. The Council is undertaking consultation on the draft Tottenham Area Action Plan (AAP) Development Plan Document (DPD) (January 2016) which contains planning guidelines and policies for the area and which once adopted, will form part of the Council's Local Plan.
- 1.2 Section 5 of the AAP relates to Neighbourhood Areas and Opportunity Sites and contains an overview of aspirations for each site as well as broad guidance for new development. Site BG3 Bruce Grove Snooker Hall and Banqueting Suite includes nos. 110-116 Bruce Grove, now known as the Regency Banqueting Suite.
- 1.3 This document consists of a statement of significance for the existing building and appraises it using adopted Historic England guidance. At this stage in the process the report concentrates upon the relative value of the building and its limited contribution to the Bruce Castle Conservation Area. There is a brief commentary on the wording of policy BG3 at section 4 of this report but it does not seek to evaluate options for either the future reuse of the building or its wholesale redevelopment. It is acknowledged that any forthcoming planning application for the redevelopment of the site will be accompanied by a comprehensive Heritage Statement in line with paragraph 128 of the National Planning Policy Framework which requires applicants to define the significance of the affected heritage, including sufficient detail to understand the potential impact of the proposal on its significance.

2.0 SITE AND SURROUNDINGS

- 2.1 The Regency Banqueting Suite is located on Bruce Grove which forms part of the main arterial A10 route running due north from Whitechapel in East London.
- 2.2 The site is located in the Bruce Castle Conservation Area, which was originally designated on 26 March 1976 as two separate sections. The boundaries were extended on 13 July 1998 when the two original parts were consolidated by the inclusion of the SE side of Bruce Grove, including the site of the Regency Banqueting Suite. A significant part of the conservation area consists of Bruce Castle and its surrounding open space, located at the northern end of Bruce Grove. The remainder of the conservation area is largely a linear group of buildings lining Bruce Grove and a small concentration of buildings to the west of Bruce Grove Station. The Regency Banqueting Suite is identified in the Conservation Area Appraisal (2009) as making a positive contribution to the character and appearance of the Bruce Castle Conservation Area.
- 2.3 Located opposite the site at nos. 5-18 (consecutive) Bruce Grove are a series of Grade II listed villas dating from the 1820s. These are in a variety of residential, business and institutional uses. To the south of the site is the former Bruce Grove Cinema at nos. 117-118 and no.119, a two storey building with a curved façade, both of which were added to Haringey's Local List on 27 January 1997. Adjacent to this are Grade II listed public toilets dating from 1920, a rare surviving example of the type complete with original fittings, designated on 28 January 1997.
- 2.4 The 1913 Ordnance Survey map of the area shows an empty triangular site wedged between the railway line and Bruce Grove. The residential streets leading from Bruce Grove and to the west of the railway line are all shown as fully developed. The Bruce Grove Cinema, designed by local architect Charles E Blackbourn, opened on the site in 1921. The northern part of the site was developed by the same architect as a ballroom, with shops at ground floor level, and was completed in 1923. The ballroom continued in operation until 1974 when it was converted to a four screen cinema. The current landowner acquired the site in 1983 at which point it was comprehensively renovated and converted, opening as the Regency Banqueting Suite, a use that continues today.

3.0 STATEMENT OF SIGNIFICANCE

- 3.1 Policy BG3 of the draft Area Action Plan (AAP) outlines the Council's aspirations for the site at paragraph 5.75 of the document:

"Masterplanned redevelopment including the retention of existing Banqueting Suite building, entrance to the former cinema building, and former public toilets building, with redevelopment of the remainder of the former cinema, and land behind, for town centre uses at ground floor level (fronting Bruce Grove) with residential above and behind."

- 3.2 In its Site Requirements section, the policy is clear that:

"The public toilets, entrance to the former cinema, and the Banqueting Suite frontage are significant heritage assets, and will be retained and brought back into active use."

- 3.3 As a response to the proposed AAP policy, this document seeks to define the significance of the existing building and highlight its obvious shortcomings. Whilst it is fully acknowledged that any future development proposals for the site would require an assessment of the relative planning merits of the scheme, it is considered that as a strategic policy, BG3 overstates the significance of the Regency Banqueting Suite and its contribution to the streetscene and wider Bruce Castle Conservation Area.

Description of the existing building

- 3.4 The Regency Banqueting Suite is a two storey building with a hipped roof, clad in modern profiled metal panels. The front façade is of multi stock brick with red brick dressings to the windows at 1st floor level. This elevation is a symmetrical composition of seven bays, each defined by a painted stucco pilaster rising to a decorative stepped cornice which runs the full length of the building. The central bay is distinguished by its Venetian window with stained glass at 1st floor level, whilst each of the adjacent bays has a pair of arched windows. These have modern replacement powder coated metal windows with double glazed sealed units and applied glazing bars. The main entrance is located in the central bay and has Tuscan columns flanking the door opening at ground floor level. At parapet level the central bay has a stepped pediment feature with the date '1923' and beneath this a stucco banner with

'The Regency' inscribed upon it. The remainder of the parapet has a painted cast iron railing in a simple geometric pattern which runs along the length of the roof.

- 3.5 At ground floor there are six retail units containing a variety of different uses. All of these have modern replacement shopfronts in either timber or aluminium, with projecting metal shutter boxes and a wide variety of modern internally illuminated projecting signs and fascias.



Fig 1 The front elevation of the building facing Bruce Grove.

- 3.6 The southern flank elevation of the building is visible from Bruce Grove and is of a lower quality brick than the front elevation, with a number of window openings now blocked up with Fletton bricks. Various items of servicing can also be seen from this public vantage point, including condenser units and a large flue located at the rear of the building.
- 3.7 The rear elevation consists of an unattractive collection of low quality original

brickwork and later 20th century extensions and modifications. A large blank metal clad box is located at 1st floor level and beneath this are an uncoordinated series of additions, constructed in Fletton brick and with a number of PVCu windows. At the southern end is a utilitarian fire escape running beneath the 1st floor projection which is supported on concrete columns. The refuse area and other back of house functions contribute to the utilitarian nature of the rear elevation.



Fig 2 The ground floor shopfronts.



Fig 3 Southern flank elevation.



Fig 4 The rear elevation of the building viewed from the carpark.

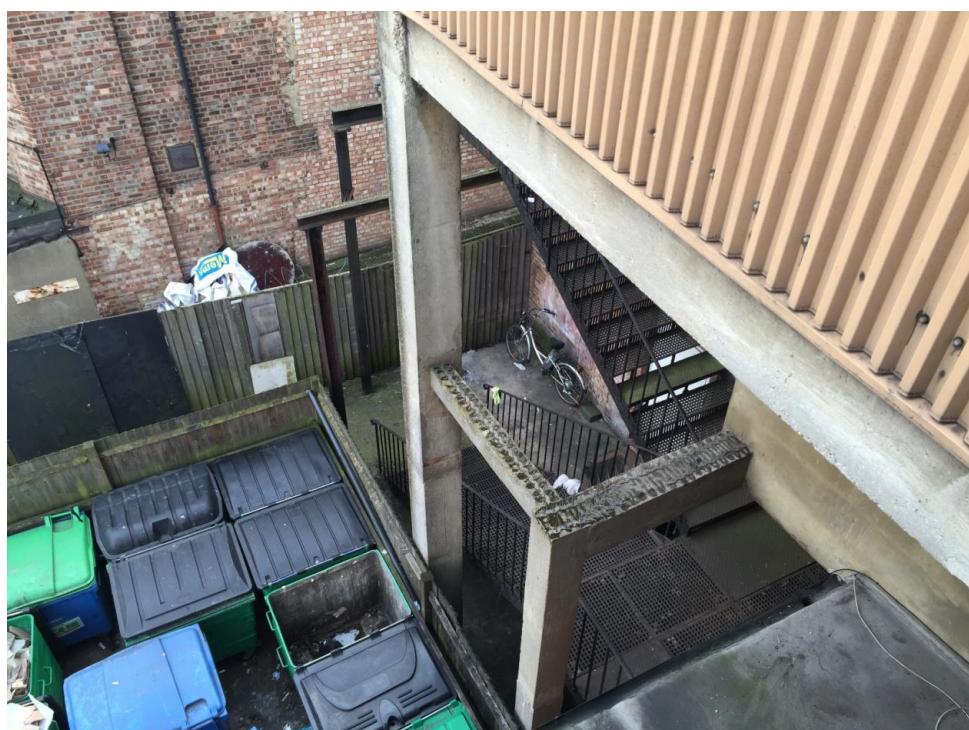


Fig 5 Fire escape and refuse area to the rear of the building.



Fig 6 View over the asphalt roofs of the rear additions to the building.

- 3.8 Located to the rear of the building is a large carpark covering the remainder of the site. This is an unattractive asphalt paved space which detracts from the setting of the building, albeit that the rear elevation is also extremely poor. To the south of the site are the side and rear elevations of the former Bruce Grove cinema. It is acknowledged that these reflect the original functionality of the building however the blank brick facades are of no architectural or aesthetic merit and combine with the low quality rear elevation of the Regency Banqueting Suite to create a negative feature that detracts from the character and appearance of the conservation area.
- 3.9 Internally the building has been wholly altered and refurbished. The original large open space at 1st floor level has been comprehensively altered, with new period decorative features such as cornices, pilasters and dado panelling. Whilst these are well executed and create an attractive space they do not relate to the age or character of the original 1920s building. The ground floor entrance to the 1st floor

former ballroom retains small amounts of original cornicing but has also been fully overhauled and altered.



Fig 7 The rear of the building and the adjacent blank facades of the former cinema.

Significance of the existing building

3.10 Historic England's (formerly English Heritage) document 'Conservation Principles – Policies and Guidance for the sustainable management of the historic environment' (2008) identifies a series of values that can be attributed to a heritage asset and which help to appraise and define its significance. Paragraph 3.3 of the document outlines that:

"In order to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:

- *who values the place, and why they do so*
- *how those values relate to its fabric*
- *their relative importance*

- *whether associated objects contribute to them*
- *the contribution made by the setting and context of the place*
- *how the place compares with others sharing similar values.”*

3.11 In order to assess the significance of the existing building we must consider the values identified by Historic England – evidential, historical, aesthetic and communal.

3.12 Evidential value

This value is derived from the potential of a place to yield evidence about past human activity (para 35) and is generally closely associated with archaeological sites and remains, with age being a strong indicator of evidential value.

3.13 In this case the building provides us with little unique evidence about past human experience. The building dates from 1923 and is from an era that is well documented in a myriad of ways through written account, photography and film. Given the modest nature of the front façade, the unattractive side and rear portions of the building and the almost wholly contemporary interior, the building is not considered to provide any notable evidential value.

3.14 Historical value

Paragraph 39 of the document outlines that “*Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.*”

3.15 It is acknowledged that the existing building does give some reminder of patterns of entertainment during the second and third quarters of the 20th century. Its construction as a purpose built ballroom, with retail units below, are resonant of a period when cinema going and communal activities such as dancing were at their peak. However, the building is no longer in the same use and is a private hire venue, staging weddings, gala dinners and other similar events. Indeed the building does not survive in anything approaching its original internal layout or condition and there are no original internal features such as a stage which might contribute to its historic interest. Indeed, there are significantly better examples of suburban dance halls, for example the Grade II listed Rivoli Ballroom in Crofton Park, south east London which has a complete 1950s interior.

- 3.16 As far as there is any evidence at this stage, there is no association with any particular person, event or movement which would provide specific associative value to the existing building.
- 3.17 **Aesthetic value**
- Aesthetic value is defined as “*....the ways in which people draw sensory and intellectual stimulation from a place.*”
- 3.18 It is acknowledged that the front of the building has a handsome symmetrical and rhythmic facade at 1st floor level and that there are some attractive details reminiscent of the 1920s, notably the railings at parapet level and the lettering in the central bay. The latter are detracted from to a degree by the expanse of modern profiled metal roof cladding that is visible behind the parapet and pediment. Whilst the overall design does have some period character, it is neither distinguished nor innovative in terms of its overall architectural quality. The materials on the front facade are unremarkable and easily sourced, and the detailing is not noteworthy in any way. Indeed, the building is a simple, modest addition to a suburban high street.
- 3.19 What little value there is to the front facade is also highly compromised by the appearance of the ground floor. The retail units present a chaotic and uncoordinated frontage, with a myriad of modern shopfronts and visually dominant internally illuminated fascias, projecting signs and metal shutter boxes. When combined with the range of intrusive colours and logos and the cluttered window displays the effect is one of poor quality.
- 3.20 The Bruce Castle Conservation Area Appraisal identifies the shopfront at no.114 as one of ‘merit’ at page 42 of the document. This is clearly an error as the existing shopfront is a modern powder coated metal replacement with a dominant shutter box and fascia above. The Appraisal does however correctly conclude that “*Unfortunately, the ground floor shopfronts and fascia signage have been unsympathetically altered and detract from the Bruce Grove streetscene.*”
- 3.21 In views northwards along Bruce Grove the southern flank of the existing building is visible from the street. This facade is undermined by the series of former window openings, which would once have provided some visual interest, but have now been unsympathetically blocked up with pink Fletton bricks.

- 3.22 The existing building visually forms part of a group with the adjacent former Bruce Grove Cinema. A large section of the front elevation of this building has been unsympathetically modified and is now neglected, creating an eyesore in this prominent position. As the historic photograph at fig 8 shows, the front elevation of the former cinema was once a far more attractive and ordered composition with a series of bays defined by contrasting brick pilasters and a unifying cornice and continuous canopy at ground floor level. The appearance of the former cinema would have created visual continuity with the Regency Banqueting Suite, each building enhancing one another's setting.



Fig 8 Historic photograph looking north along Bruce Grove with the former cinema in the foreground and the Regency Banqueting suite beyond. Courtesy of Cinema Treasures.

- 3.23 Given the denuded and dilapidated condition of the facade to the former cinema, some of the significance and group value of the buildings, designed by the same architect in the early 1920s and clearly intended to visually complement each other, has been lost. The draft AAP is clear when discussing the former cinema building that "*The aim on this site allocation is to remove the existing blank facade, which is of detriment to the area, and replace it with a new frontage which complements assets to the north, south and across the road.*" If this aspiration is achieved then the

significance of the Regency Banqueting Suite will be further eroded, with the loss of its original context and setting.

3.24 Communal value

This value is derived from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience of memory. In this case, any communal value would be ‘social’, defined at paragraph 56 as “*.....places that people perceive as a source of identity, distinctiveness, social interaction and coherence.*”

- 3.25** As outlined above at paragraph 3.16 there is no immediate evidence of this building’s relationship with any significant past events or movements that would give it cultural value or significance to the local community. It is likely that individuals will have memories of using the building in its former incarnation as a ballroom and then a cinema and this will have created some limited personal attachment to the building. However, there is no easily available or accessible evidence of this, particularly as the building has now been in use as a private entertainment venue for over 30 years. It has to be concluded that the communal value of the existing building is limited and of no discernible significance.

Contribution of the building to the wider context

- 3.26** The building is located in the Bruce Castle Conservation Area and is identified as making a positive contribution to its character and appearance. Historic England has recently adopted new conservation area guidance which supersedes their 2011 document. ‘Conservation Area Designation, Appraisal and Management – Historic England Advice Note 1’ (February 2016) contains advice at paragraph 61 with regard to defining positive contributors:

“Most of the buildings in a conservation area will help to shape its character. The extent to which their contribution is considered as positive depends not just on their street elevations but also on their integrity as historic structures and the impact they have in three dimensions, perhaps in an interesting roofscape or skyline. Back elevations can be important, as can side views from alleys and yards. It will be helpful to identify those key unlisted buildings that make an important contribution to the character of the conservation area, as well as those which clearly detract from it and could be replaced. A checklist of questions to help with this process can be found in

Table 1. A positive response to one or more of the following may indicate that a particular element within a conservation area makes a positive contribution, provided that its historic form and value have not been eroded."

3.27 The checklist referred to above includes a number of categories which help to assess the nature and degree of contribution that a building makes to the character and appearance of a conservation area. These have been assessed in turn below:

- Is it the work of a particular architect or designer of regional or local note?

Response: The building was designed by Charles E Blackbourn, a local architect. The London Gazette of 1910 gives his address as 355 High Road, South Tottenham. However, there is little evidence of any other local or regional buildings that he was responsible for, and nothing of any particular note or influence.

- Does it have landmark quality?

Response: The building has a modest front façade that is aligned conventionally with the street. The building is not located at a prominent junction nor positioned or designed in such a way that would give it landmark quality within the wider townscape.

- Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?

Response: The building dates from 1923 and with the adjacent former cinema filled one of the last small pockets of undeveloped land in the immediate area. The vast majority of surrounding buildings within the conservation area are older. Notably, the Grade II listed buildings opposite the site on the west side of Bruce Grove date from the 1820s and are typical yellow stock brick semi-detached villas of the period. Further to the north Bruce Grove is lined with Victorian and Edwardian terraced houses and original shops with flats above. Indeed, the 1920s houses at 22-26 Bruce Grove have been explicitly omitted from the conservation area.

Although there is clearly no requirement for conservation areas to be homogenous in terms of the age, form and style of their buildings, in this case the existing building is

quite pronouncedly different from the remainder of the built context at the southern end of Bruce Grove, particularly in terms of its height, use and overall aesthetic.

- Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?

Response: The building does have a visual and historic relationship with the adjacent former cinema which is included on Haringey's Local List, although this is not a statutory designation. The redevelopment of the majority of the former cinema site is an aspiration of the draft AAP, an outcome which would sever this relationship. As outlined above the building was constructed approximately 100 years after the group of Grade II listed early 19th century villas on the west side of Bruce Grove and does not relate to these heritage assets in any historically significant or aesthetic manner. Whilst the building is of a similar period to the listed public toilets, they do not share any similarities in terms of materials, function or architectural style.

- Does it contribute positively to the setting of adjacent designated heritage assets?

Response: The former ballroom does currently contribute positively to the setting of the adjacent former cinema. However, the draft AAP identifies only the retention of the entrance to this building which is located some distance further south and would presumably be separated by a modern redevelopment of the site if the aspirations of the draft AAP are realised. The building is not considered to form a conscious part of the setting to the listed early 19th century villas and appears simply as part of the overall background townscape of the street in views north and south along Bruce Grove. Given the small scale of the Grade II listed public toilets and its distance from the site, the existing building is not considered to contribute positively to its setting.

- Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?

Response: No, the site does not form part of a complex of public buildings in an institutional or civic sense. The former ballroom and adjacent cinema were buildings that were open to the general public however the Regency Banqueting suite is

aligned with the street in a conventional manner and has underwhelming and unattractive side and rear facades.

- Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?

Response: No

- Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?

Response: Any building will by definition illustrate the development of the settlement in which it stands, albeit to only a small degree. The building does form part of a group with the adjacent former cinema and there is some limited interest as a result.

- Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park or a landscape feature?

Response: No, this triangular site along with the adjacent former Bruce Grove cinema were the last piece of undeveloped land in the area by the early 1920s and represent a final piece of infill development.

- Does it have historic associations with local people or past events?

Response: No, there is no evidence of any specific historic association.

- Does it reflect the traditional functional character or former uses in the area?

Response: The building is unusual in terms of its original use at 1st floor level – the current use has some similarities with this. The ground floor remains in retail use and in this respect does reflect the traditional functional character of the area.

- Does its use contribute to the character or appearance of the area?

Response: The ground floor retail uses are consistent with the overall character of Bruce Grove and the historic pattern of development. The 1st floor entertainment

venue has little external expression with only modest signage grouped around the main entrance in the centre of the building. In a heterogeneous suburban high street such as this, most uses are likely to make a limited contribution to the unique character and appearance of an area without being of specific value in their own right.

- 3.28 The Historic England advice indicates that a positive response to one or more of the checklist “*may indicate that a particular element within a conservation area makes a positive contribution*”. This is provided that its historic form and value have not been eroded. However, when assessing the checklist it would be difficult to find any building within a given conservation area that does not in some way satisfy at least one of these criteria. Moreover, the responses to the checklist must be considered in qualitative terms, acknowledging that there is a sliding scale of merit and degree to which a building makes a positive contribution. In this case, given the appearance of the rear and flank elevations, the remodeled interior and the negative feature of the ground floor shopfronts, the building is considered to make only a marginal positive contribution to the character and appearance of the Bruce Castle Conservation Area.

- 3.29 It is also worth noting that the Historic England guidance refers to the importance of considering a building ‘in the round’, outlining that:

“The extent to which their contribution is considered as positive depends not just on their street elevations but also on their integrity as historic structures and the impact they have in three dimensions, perhaps in an interesting roofscape or skyline. Back elevations can be important, as can side views from alleys and yards.”

- 3.30 Given the poor quality of the flank and particularly the rear sections of the building, which have no architectural or aesthetic merit whatsoever, the overall contribution of the building must consequently be reduced.

4.0 COMMENTARY ON PROPOSED POLICY BG3

- 4.1 The Site Requirements section of policy BG3 of the draft AAP states that:

"The public toilets, entrance to the former cinema, and the Banqueting Suite frontage are significant heritage assets, and will be retained and brought back into active use."

The use of 'significant heritage assets' fails to differentiate between the various buildings that characterise the southern end of Bruce Grove. The public toilets are Grade II listed and benefit from statutory protection. The adjacent former cinema is a locally listed building, in recognition of its historic and architectural value. The Regency Banqueting Suite Grade has no formal designation, beyond its inclusion in the Bruce Grove Conservation Area. This statement has addressed the significance of the existing building in detail, appraising it against adopted Historic England guidance and has concluded that its contribution and significance are limited.

- 4.2 The bullet points in the Site Requirements section refer to the following:

"The site lies within the Bruce Grove Conservation Area and development should positively enhance its character and setting along with the setting of the listed buildings opposite."

"A sensitive additional storey extension to the Banqueting Suite will be acceptable where it can be demonstrated that it enhances the setting and character of the building, and the wider conservation area."

- 4.3 The National Planning Policy Guidance (NPPF) is clear that when considering planning applications local authorities should take account of the desirability of sustaining and enhancing heritage assets. However, the statutory tests at s.16 and s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 refer only to the requirement to 'preserve' in the case of the former, and 'preserve or enhance' in the case of the latter test. Thus, whilst acknowledging the aspirations of the Council for development to be of the highest quality and to enhance where possible, the wording of policy BG3 exceeds the requirements of the statutory tests.

5.0 CONCLUSION

- 5.1 This statement has sought to define the significance of the Regency Banqueting Suite building and assess its value and contribution to the wider townscape.
- 5.2 Whilst the building has some attractive characteristics these are restricted to the front facade at 1st floor and the overall architectural composition and quality of the building are unremarkable. The building and adjacent former cinema were some of the last to be built within the immediate area and share little in the way of age, form, materials or style with the majority of buildings within the Bruce Grove Conservation Area. The building has some limited historic interest in terms of its use and its relationship with the former Bruce Grove cinema, however this relationship would be fractured by the implementation of a scheme that accords with the aspirations of the draft AAP.
- 5.3 In summary, the existing building is considered to make a limited and marginal contribution to the character and appearance of the Bruce Grove Conservation Area.

Sources

'Conservation Area Designation, Appraisal and Management. Historic England Advice Note 1'
(February 2016)

London Borough of Haringey Conservation Area No.6 Bruce Castle, Conservation Area Appraisal
(2009)

English Heritage 'Conservation Principles' (2008)

<https://londonpostcodewalks.wordpress.com/2015/12/14/n17-spurred-into-action/>

<http://cinematreasures.org/theaters/15233>