

Consultation Statement

On the draft Conservation Area Appraisals for Bruce Castle, Tottenham Cemetery, Tower Gardens and Peabody Cottages Conservation Areas.

July 2019

1. Consultation Overview

- 1.1 In 2018 the Council produced new Conservation Area Appraisal and Management Plans for four conservation areas in Tottenham: Bruce Castle, Tottenham Cemetery, Tower Gardens and Peabody Cottages. This work was part of our ongoing programme to renew Conservation Area Appraisals across the borough. The new documents, researched and written by heritage consultants, include a description of the character of the conservation area, detailed design guidelines, and a review of conservation area boundaries. Small changes were recommended to the boundaries of Bruce Castle CA and Tottenham Cemetery CA. In each case, a small area would be removed from the designation.
- 1.2 Cabinet approved a six-week consultation on the draft documents in November 2018, aimed at gauging public support for the adoption of the documents and giving residents the opportunity to comment in detail on the documents and make suggestions.
- 1.3 A total of 38 responses were received from 26 consultees. The majority were from local residents. We also received responses from local residents' groups, CAACs, Historic England and Natural England. The response was generally positive, while concerns over the condition and management of the areas were also expressed.
- 1.4 The consultation was carried out in line with relevant statutory requirements and the Council's statement of community involvement (SCI).

2. Methodology

- 2.1 The consultation took place between Monday January 14th 2019 and Monday February 25th 2019. Notifications letters were sent to all addresses within each conservation area explaining the purpose of the consultation and detailing how to take part. Additionally, notifications were sent to all consultees on the Planning Policy consultation database.
- 2.2 A notice was placed in the Ham & High on the 14th January stating the dates of the consultation, where to view the document and how to respond. Information about the consultation was published on the Council's website. The consultation documents were also available to download from the website. Paper copies of the document were made available to view at Coombe's Croft Library and River Park House.
- 2.3 Consultees were invited to submit comments either through an online questionnaire accessed from the council's website, through a written questionnaire submitted in person at one of the public meetings, or by writing or emailing the conservation team.
- 2.4 Section 71 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that proposals for the preservation and enhancement of Conservation Areas (such as the new Appraisals and Management Plans that were the subject of this consultation) are submitted for consideration to a public meeting in the area to which they relate. Two public drop-in meetings were held in the area: On 26th January at Bruce Castle Museum, and on 4th February at 639 Enterprise Centre (Tottenham High road). Council officers were available to discuss issues and answer questions.

3. Summary of responses

- 3.1 Following the consultation, all comments received were analysed. There were a total of 38 responses. 19 were submitted by email, 9 via the online survey, and 10 in writing at public meetings.

- 3.2 Many of the responses expressed support for the adoption of the new documents and for the preservation and enhancement of the conservation areas, and approved of the general approach and detailed work that has gone in to preparation of the documents. Concerns were expressed about the condition of the conservation areas, the lack of effective planning enforcement and management, and possible future threats including development pressure.
- 3.3 One respondent objected to the new documents citing the limitations placed on residents, and the cost of complying with guidelines. One respondent objected to the proposed boundary change to Bruce Castle Conservation Area, citing concern over the consequential weakening of heritage protections. There were no objections to the proposed change to the boundary of Peabody Cottages Conservation Area.
- 3.4 The table on the next page summarises the main issues arising from the consultation, and the Council's response to them. A full list of responses is included in Appendix 2.

Theme	Council response and amendments
General Themes	
<p>Concern about the general condition of the conservation area, and the lack of effective enforcement, including specific enforcement issues.</p>	<p>The new appraisals record the current condition of the conservation areas in some detail, including where unauthorised or inappropriate development has had a detrimental impact. The management plans include a commitment to enforce against inappropriate change in line with the Council's adopted development charter, and outlines specific enforcement priorities (section 2.4).</p> <p>The updated appraisals will be an important tool in ensuring effective enforcement going forward. They highlight key enforcement issues and provide a sound basis for enforcement action that is defensible on appeal.</p> <p>The appraisals include design guidelines clarifying what works are appropriate in the CA and when consent is required. It is hoped that this will help prevent inappropriate works being carried out without consent in the future.</p>
<p>Support for the adoption of appraisals, the general approach, methodology and level of detail. Support for the protection and preservation of the conservation areas in general.</p>	<p>Noted. No amendment</p>
<p>Concern about inappropriate works by the Council or management partners.</p>	<p>The new management plans include a commitment to ensure that all departments work co-operatively to ensure the preservation and enhancement of the CA (section 2.3).</p> <p>The finalised document will be shared with all relevant departments and other stakeholders, and should provide the basis for a consistent management approach across departments.</p> <p>Where necessary, the conservation team will liaise directly with other departments and partners to address management issues. Development carried out by the Council, Homes for Haringey, and other partners is subject to the same constraints and requirements as any other development, and proposals would be assessed and enforced against relevant planning policy and guidance in the usual way. The Council is keen for public landowners and property management organisations to be setting an exemplar for Conservation Areas.</p>
<p>Minor suggested amendments to clarify or correct small errors, or to add in useful information or additional detail</p>	<p>The documents have been amended where appropriate. A full list of amendments is contained in table 5 on page 8.</p>

Bruce Castle Conservation Area	
<p>Concern about the general condition of the conservation area, and the lack of effective enforcement.</p>	<p>Concerns are noted. The new appraisals record the current condition of the conservation areas in some detail, including highlighting where unauthorised or inappropriate development has had a detrimental impact. The management plans include a commitment to enforce against inappropriate change in line with the Council’s adopted development charter, and outline specific enforcement priorities (section 2.4).</p> <p>The updated appraisals will be an important tool in ensuring effective enforcement going forward. They highlight key enforcement issues and provide a sound basis for enforcement action that is defensible on appeal.</p> <p>The appraisals include design guidelines clarifying what works are appropriate in the CA and when consent is required. It is hoped that this will help prevent inappropriate works being carried out without consent in the future.</p>
<p>Objections to the proposed boundary change because of concerns that the area forms part of the setting of the historic park and the change represents an unnecessary weakening of conservation control.</p>	<p>There is a statutory duty to review conservation area designations from time to time (Planning, (Listed Buildings and Conservation Areas) Act 1990, 69) and the Council must ensure that designated conservation areas are of sufficient special architectural or historic interest, in line with the National Planning Policy Framework (paragraph 186) and Historic England guidelines. The area in question is not considered to have any special heritage interest warranting designation.</p> <p>Restrictions to certain permitted development rights would no longer apply to the area following the boundary change. However, any development likely to have a significant impact on the setting of the CA would still require planning consent. Relevant planning legislation and national and local planning policy require that any impact on the setting of heritage assets is taken in to account when assessing planning applications. The Council is required to give considerable importance and weight to any harm to the setting of a designated heritage asset.</p>
<p>Support for the adoption of appraisals, the general approach, methodology and level of detail. Support for the protection and preservation of the conservation areas in general.</p>	<p>Noted. No amendment</p>
<p>Concerns about proposals to use Bruce Castle Park for the NFL Tailgate event, and about the impact of associated changes to the park’s boundaries.</p>	<p>Concern is noted. Bruce Castle Park is considered to be part of the curtilage of Grade I Listed Bruce Castle. The entire park including its boundaries is also within the conservation area and makes an important contribution to its special interest. Any proposals for alterations to the park’s structures that require planning consent would be considered against relevant legislation and national and local planning policy relating to heritage. The</p>

	<p>appraisal document, if adopted, would be taken in to account when deciding any future planning applications affecting the park.</p>
<p>Suggested addition to the CA to the north boundary to include 126-136 Church Road and 83 Church Road, and the rear of the properties along Bruce Castle Road.</p>	<p>The Council's consultants have undertaken a comprehensive review of the conservation area boundaries as part of the appraisal. This included consideration of buildings adjacent to current boundary. The houses at 126-136 and 83 Church Rd were not considered to have sufficient heritage interest to warrant designation.</p> <p>The backs of houses on Bruce Castle Road form part of the setting of Bruce Castle Park, but do not have sufficient heritage interest in their own right to warrant inclusion in the CA. Alterations to these houses affecting the setting of the conservation area would be required to preserve or enhance its special interest in line with national and local policy and legislation.</p>
<p>Concerns about inappropriate works by the council</p>	<p>The new management plans include a commitment to ensure that all departments work co-operatively to ensure the preservation and enhancement of the CA (section 2.3).</p> <p>The finalised document will be shared with all relevant departments and other stakeholders, and should provide the basis for a consistent management approach across departments.</p> <p>Where necessary, the conservation team will liaise directly with other departments and partners to address management issues. Development carried out by the Council, Homes for Haringey, and other partners is subject to the same constraints and requirements as any other development, and proposals would be assessed and enforced against relevant planning policy and guidance in the usual way. The Council is keen for public landowners and property management organisations to be setting an exemplar for Conservation Areas.</p>

Peabody Cottages Conservation Area	
<p>Suggested amendment to the document text to note the possibility of pedestrian connections to the north.</p>	<p>Amendment to 1.6.2 (public realm)</p> <p>“Vehicular access and exit points are confined to Lordship Lane, and parking restrictions apply within the estate. This has meant relatively little signage clutter and limited opportunities for rat-running which contribute to the estate’s peaceful ambience. <u>However, the estate’s layout would allow for a pedestrian connection to the roundway on the north side that might improve accessibility. Streets are currently closed off with a high walls or fences at their north end.”</u></p>

Tottenham Cemetery Conservation Area	
Support for the adoption of appraisals, the general approach, methodology and level of detail. Support for the protection and preservation of the conservation areas in general.	Noted. No amendment
Concerns about the management of the conservation area by Dignity, including lack of investment/maintenance, inappropriate works, and lack of close working with the Council and residents.	<p>The new management plans include a commitment to ensure that all departments work co-operatively to ensure the preservation and enhancement of the CA (section 2.3).</p> <p>The finalised document will be shared with all relevant departments and other stakeholders, and should provide the basis for a consistent management approach across departments. Where necessary, the conservation team will liaise directly with other departments and partners to address management issues.</p> <p>The management plan specifically recommends close future liaison with Dignity, to include agreement on a consultation process for categories of work that don't come under the control of planning (such as landscaping and repairs).</p> <p>A number of issues raised during the consultation do not generally fall under planning control (such as gardening and landscaping, trees). Comments have been passed on to the Council's Nature Conservation officer for consideration, and will be taken in to account in development of the Council's forthcoming Parks and Open Spaces Strategy and Biodiversity Action Plan as well as other relevant projects.</p>
Specific enforcement complaints	Specific enforcement complaints raised during the consultation have been passed on to the Council's enforcement team who will determine what action is appropriate.

Tower Gardens Conservation Area	
Concern about the general condition of the conservation area, and the lack of effective enforcement.	<p>Concern is noted. The new appraisals record the current condition of the conservation areas in some detail, including where unauthorised or inappropriate development has had a detrimental impact. The management plans include a commitment to enforce against inappropriate change in line with the Council's adopted development charter, and outlines specific enforcement priorities (section 2.4).</p> <p>The updated appraisals will be an important tool in ensuring effective enforcement going forward. They will highlight key enforcement issues and provide a sound basis for enforcement action that is defensible on appeal.</p>

	<p>The appraisals include design guidelines about what works are appropriate in the CA and when consent is required, communicated in an accessible way. It is hoped that this will help prevent inappropriate works being carried out without consent in the future.</p>
<p>Concerns about inappropriate works by the Council and Homes for Haringey</p>	<p>This issue is noted in some detail in the new appraisal (section 1.6). The new management plans include a commitment to ensure that all departments work co-operatively to ensure the preservation and enhancement of the CA (section 2.3). The finalised document will be shared with all relevant departments and other stakeholders, and should provide the basis for a consistent management approach across departments going forward.</p> <p>Where necessary, the conservation team will liaise directly with other departments and partners to address management issues. Development carried out by the Council, Homes for Haringey, and other partners is subject to the same constraints and requirements as any other development, and proposals would be assessed and enforced against relevant planning policy and guidance in the usual way. The Council is keen for public landowners and property management organisations to be setting an exemplar for Conservation Areas.</p> <p>A number of issues raised during the consultation do not generally fall under planning control, but are recognised as making an important contribution to the special character of the estate, such as front garden landscaping and hedges. Comments have been passed on to the Council's Nature Conservation officer for consideration, and will be taken in to account in development of the Council's forthcoming Parks and Open Spaces Strategy and Biodiversity Action Plan as well as other relevant projects.</p>
<p>Comments noting that the Article 4 direction that restricts permitted development rights on the estate needs to be updated and extended to cover the whole CA. Suggestions that further clarification is needed on the Article 4 Direction and planned changes to it.</p>	<p>The management plan includes recommendations to update the existing Article 4 Direction and extend it to include the whole of the conservation area. It is the Council's intention to bring this forward as a priority, but the changes would not come in to effect upon adoption of this appraisal. Changes to the Article 4 Direction would be consulted on separately in line with the statutory process, and further detailed information would be provided to residents at that time.</p> <p>Amendment to include a map included at section 1.3 (Location and setting) showing the current boundary of the Article 4 Direction as well as the conservation area boundary.</p>

<p>Concern about the condition of bushes, hedges, green space and front garden landscaping (including loss of boundary hedges), noting that maintenance requirements can be onerous and that many residents need support maintain these spaces appropriately.</p>	<p>The appraisal notes the important contribution that landscaping, planting and green space makes to the special character of the area in section 1.2 Summary of special interest, 1.3 Location and setting. Section 1.6 Condition and development pressure notes the poor condition of some hedges and gardens, as well as the detrimental impact where hedges have been replaced.</p> <p>Design guidance contained in the management plan states that loss of front gardens and boundary treatments for the creation of parking spaces will not be considered acceptable. It is also note that the retention and maintenance of hedges is encouraged. However, works to hedges (as well as other gardening and planting works) do not fall under planning control. Comments on this issue have been passed on to the Council’s Nature Conservation officer for consideration, and will be taken in to account in development of the Council’s forthcoming Parks and Open Spaces Strategy and Biodiversity Action Plan as well as other relevant projects.</p>
<p>Support for the adoption of appraisals, the general approach, methodology and level of detail. Support for the protection and preservation of the conservation areas in general.</p>	<p>Noted. No amendment</p>
<p>Specific enforcement complaints</p>	<p>Specific enforcement complaints raised during the consultation have been passed on to the Council’s enforcement team who will determine what action is appropriate.</p>
<p>Need to raise awareness of heritage issues among local residents and new home owners. Suggestion to provide new residents with a copy of the appraisal document.</p>	<p>It is hope that the new document will provide a clear and accessible explanation of the area’s special heritage interest, as well as the guidelines for appropriate maintenance and restrictions on development. It is not practicable to provide a copy of the document (which is quite large) to every resident. However, if the new appraisal is adopted, a short colour leaflet highlighting the special interest of the CA and design guidelines will be mailed to residents alongside notification of the adoption.</p> <p>New residents looking to buy a house in the area would be made aware of the conservation area designation and Article 4 as these would be revealed in a standard land charges search.</p>
<p>Objection to the designation and the content of the document because of unfair restrictions to homeowners, and the cost of complying with requirements (1 comment).</p>	<p>The conservation area designation has been in place since 1978. There are no proposals to change this, and removal of the conservation area designation was not considered as part of this consultation. The Council has a statutory duty to identify and designate areas of special historic and architectural interest Planning (Listed Buildings and Conservation Areas) Act 1990</p>

	<p>69(1). This comprehensive appraisal confirms that the area has considerable heritage interest warranting designation.</p> <p>There is an existing requirement to preserve and enhance the special interest of the conservation area in line with legislation and national and local adopted planning policy. That requirement is outside the scope of this consultation. The guidelines contained in this document provide clarity on the best way to achieve this, and are not considered particularly onerous or expensive. Using inappropriate materials and techniques when doing work to historic buildings can damage the structure or introduce a maintenance burden. Following the design guidelines can help to avoid that situation and save money in the longer term.</p>
<p>Suggestion to extend the conservation area boundary to include the area to the north between Risley Avenue and the Roundway, and/or to include the green corridor that runs along the roundway to the east of the CA.</p>	<p>Concerns about the area to the north of the CA are noted. The area between Risley Avenue and the Roundway was developed after the war and did not form part of the original phase of development. It was designed along very different lines to the older part of the estate, and notably lacks the Arts and Crafts influenced architectural character and quality of the earlier phase. A comprehensive review of the boundaries of the conservation area has been undertaken in preparation of the document, and it is not considered that this area has sufficient heritage interest to warrant designation.</p> <p>The green corridor forms part of the setting of the estate but is not considered to have any particular heritage interest in its own right. It is not considered appropriate to include this within the designation.</p>

4. Next steps

- 4.1 We have considered all comments and where appropriate, have suggested amendments to the document to reflect consultation comments (detailed in the table on page 11).
- 4.2 The consultation exercise is considered to be successful, demonstrating engagement from local community groups, support for the broad aims of the document and conservation aims in general, and providing useful input so that the final document and will better reflect the needs and outlook of the local community.
- 4.3 The final amended Appraisal and Management Plans will be referred back to the cabinet for adoption in June 2019.

5. Schedule of Amendments

Paragraph	Amendment	Rational
<p>PB1</p> <p>Peabody Cottages Appraisal 1.6.2 (Public Realm)</p>	<p>Text amendment: “Vehicular access and exit points are confined to Lordship Lane, and parking restrictions apply within the estate. This has meant relatively little signage clutter and limited opportunities for rat-running which contribute to the estate’s peaceful ambience. <u>However, the estate’s layout would allow for a pedestrian connection to the roundway on the north side that might improve accessibility. Streets are currently closed off with a high walls or fences at their north end.</u>”</p>	<p>To more thoroughly describe the current public realm and access arrangements, in response to comments submitted.</p>
<p>TG1</p> <p>Tower Gardens Appraisal Section 1.3 (Location and setting)</p>	<p>Amendment to include a map showing the current boundary of the Article 4 Direction as well as the conservation area boundary.</p>	<p>To clarify the extent of the Article 4 direction</p>
<p>TG2</p> <p>Tower Gardens Appraisal Section 1.6 Public Realm</p>	<p>Text Amendment: “The principal public open space of Tower Gardens itself is largely concealed from the surrounding streets, but clearly noticeable from the tall trees visible above the roofline of the two storey houses. The street grid therefore forms the main aspect of the public realm within the conservation area and a consistent feature is the survival of the privet hedges fronting the property boundaries. <u>Signs in the estate include the words ‘Tower Gardens Conservation Area’ underneath the street name. While not an original feature, these are attractively designed and help to highlight the area’s special interest. The street names themselves are unusual. A number are thought to be named after former Lords of the Manor of Tottenham.</u>”</p>	<p>To more thoroughly describe the conservation area and the contribution made by street furniture and street naming, in response to comments submitted.</p>
<p>TG3</p> <p>Tower Gardens Appraisal Section 1.3 Setting</p>	<p>Text Amendment: “The Southern boundary is formed by Lordship Lane which is lined with mainly Edwardian terraces and is not within a conservation area. <u>The street itself and buildings to its south are not included in a conservation area.</u>”</p>	<p>Clarification in response to comments received.</p>
<p>TG4</p> <p>Tower Gardens appraisal section 1.4 Historical development</p>	<p>Text amendment: “When construction ceased in spring 1915, 963 homes had been built on about 40 acres of land. Risley Avenue School to the north east of the estate <u>and the Church of St Benet Fink (Listed Grade II)</u> had opened to serve the expanding population. <u>The latter, by J S Alder, featured an organ brought from the church of St Peter-le-Poer in the City of London, and was built with money from the demolition of St Peter-le-Poer in 1908.</u></p>	<p>To more thoroughly describe the history and evolution of the area, in response to comments submitted.</p>

<p>TG5</p> <p>Tower Gardens appraisal section 1.4 Historical development</p>	<p>Text amendment: “The estate is now roughly 50% owner occupier and 50% Council Owned, the latter managed by social landlords, principally Homes for Haringey <u>split between Council ownership and private ownership, and there is a mix of tenures including owner-occupation, private tenancies, and properties managed by social landlords (including Homes for Haringey).</u>”</p>	<p>Clarification in response to comments received. The exact tenure mix is not known.</p>
<p>TG6</p> <p>Tower Gardens Appraisal section 1.3 Trees and Open Space</p>	<p>Text amendment: “The principal public open space in the conservation area is Tower Gardens Recreation ground (<u>now known as Tower Gardens Park</u>). It is enclosed by houses on four sides providing a secluded and tranquil character. The main entrance in Risley Avenue has brick gatepiers with stone ball finials and iron gates with a roundel pattern. There is a similar smaller entrance to the south east in Tower Gardens Road; a third to the south west has been blocked. The gardens are <u>park is</u> enclosed by grey brick walls with red brick copings, which also form the rear garden walls of the surrounding houses.”</p> <p>“Tower Gardens <u>Park</u> is designated by Haringey as Significant Local Open Land (SLOL)”</p>	<p>Amendment for clarity and to better reflect the commonly used terminology, in response to comments received.</p>
<p>TG7</p> <p>Tower Gardens Appraisal section 1.3 Views</p>	<p>Text amendment: “The pre-war section of the conservation area is enclosed by terraces and views are largely contained within the grid of streets, with longer views through the conservation area confined to roads that cross the main grid (Waltheof Avenue, Kevelioc Road and Awlfield Avenue), and along Risley Avenue and Tower Gardens Road. <u>Views along Waltheof Avenue looking south frame the entrance gates to Lordship Recreation Ground to the south and provide an important visual connection to that open space. The view looking east along Mortayne Road is terminated to good effect by a carefully positioned pedimented gable on the Awlfield Avenue terrace opposite.</u></p>	<p>Amendment to more thoroughly describe important views within the CA, in response to comments received.</p>
<p>BC1</p> <p>Bruce Castle appraisal Introduction (p4)</p>	<p>Additional text to the end of 4th paragraph: <u>“The name of the conservation area was changed in 2019 to Bruce Castle and All Hallows Conservation Area to better reflect the historic importance of All Hallows Church.”</u></p>	<p>Amendment for clarity following recommended name change</p>
<p>BC2</p> <p>Bruce Castle Appraisal paragraph 1.3.8 Views</p>	<p>Text Amendment: “An unexpected long view is gained looking west along Lordship Lane directly towards Alexandra Palace. <u>This view of Alexandra Palace is identified as a locally significant view in Haringey’s Local Plan.</u>”</p>	<p>Additional information added in response to comments received.</p>

<p>BC3</p> <p>Bruce Castle Appraisal Section 3 Preserving and enhancing the conservation area</p>	<p>New text added:</p> <p><u>“3.9. Development affecting the setting of the conservation area</u></p> <p><u>Proposals that would affect the setting of the conservation area or the settings of Listed and locally listed buildings within the conservation area, will also be assessed against heritage policies, and are required to preserve or enhance the significance of the affected heritage assets.</u></p> <p><u>The open character of Bruce Castle Park allows for long views, so that large-scale development or tall buildings on nearby sites may be visible and could affect the character of the conservation area. The impact of any such proposals on views from the park should be assessed as part of an accompanying Townscape and Visual Impact Assessment.</u></p> <p><u>More detailed guidance on assessing impacts on the setting of heritage assets is contained in <i>Historic England Good Practice Advice Note 3: The Setting of Heritage Assets.</i>”</u></p>	<p>Guidance added in response to comments received from Historic England</p>
<p>BC4</p> <p>Bruce Castle Appraisal section 4.3 Appendix C – Planning Policy and Guidance Links</p>	<p>Text added:</p> <p><u>“Historic England Good Practice Advice Note 3: The Setting of Heritage Assets (2017) https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/”</u></p>	<p>Link added to the guidance document referred to in 3.9</p>
<p>BC5</p> <p>Bruce Castle Appraisal section 1.5 p.38 Bruce Castle Townscape Map</p>	<p>Amendment to map so that the Elmhurst Public House is shown as an ‘important frontage’. It was shown as a statutory Listed Building in the consultation draft, but is not statutory Listed.</p>	<p>Error correction and clarification in response to comments from Historic England.</p>
<p>BC6</p> <p>Bruce Castle Appraisal section 2.6 Recommended steps: Heritage Lottery Funding</p>	<p>Text Amendment:</p> <p>“Heritage Lottery Funding <u>Funding opportunities and heritage-led regeneration</u></p> <p>2.6.4 As a Grade I listed building which houses the Borough Museum and archives service and a public park, Bruce Castle and Park potentially meet the eligibility criteria for Heritage Lottery funding on several counts. For larger projects, project management costs can also be included. <u>is likely to meet the eligibility criteria for the National Lottery Grants for Heritage as well as grant funding from Historic England and other grants programmes and funding streams related to heritage. This could cover a range of costs including capital works and project</u></p>	

	<p><u>and delivery costs. Opportunities to obtain funding for repair and enhancement of the assets and their setting through Section 106 planning obligations and CIL should also be explored.</u></p> <p>2.6.5. Churchyards too are eligible for Heritage Lottery funding, and future consideration should be given to the repair and enhancement of All Hallows churchyard is an important historic space and local amenity, <u>and consideration should be given to opportunities for grant funding to support repair and enhancement.</u></p> <p>2.6.6. The two assets, Bruce Castle and All Hallows Church are important buildings within Tottenham. Given the wider regeneration aspirations for the area, joint efforts <u>co-ordinated working</u> should be sought to ensure that these heritage assets are integrated in <u>integral to</u> current and future area improvement <u>regeneration</u> plans, <u>and to ensure that the historic environment is used as a basis for heritage-led regeneration and positive change (in line with Haringey’s Local Plan policy SP12).</u>”</p>	
<p>TC1</p> <p>Tottenham Cemetery Appraisal Section 3 Preserving and enhancing the conservation area</p>	<p>New text added:</p> <p><u>“3.9. Development affecting the setting of the conservation area</u></p> <p><u>Proposals that would affect the setting of the conservation area or the settings of Listed and locally listed buildings within the conservation area, will also be assessed against heritage policies, and are required to preserve or enhance the significance of the affected heritage assets.</u></p> <p><u>The open character of the cemetery allows for long views, so that large-scale development or tall buildings on nearby sites may be visible and could affect the character of the conservation area. The impact of any such proposals on views from the cemetery should be assessed as part of an accompanying Townscape and Visual Impact Assessment.</u></p> <p><u>More detailed guidance on assessing impacts on the setting of heritage assets is contained in <i>Historic England Good Practice Advice Note 3: The Setting of Heritage Assets.</i>”</u></p>	<p>Guidance added in response to comments received from Historic England</p>
<p>TC2</p> <p>Tottenham Cemetery Appraisal section 4.3 Appendix C – Planning Policy and Guidance Links</p>	<p>Text added:</p> <p><u>“Historic England Good Practice Advice Note 3: The Setting of Heritage Assets (2017) https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ “</u></p>	<p>Link added to the guidance document referred to in 3.9</p>