



Historic England

**LONDON BOROUGH OF HARINGEY LOCAL PLAN EXAMINATION**

**TOTTENHAM AREA ACTION PLAN**

**STATEMENT BY HISTORIC ENGLAND**

**MATTER 2: AREA WIDE ISSUES**

**Hearing Session – 6th September 2016**

**References:**

**Pre-Submission Version Tottenham Area Action Plan January 2016**

**Pre-Submission Version Alterations to Strategic Policies January 2016**

**Urban Character Study Haringey Council February 2015**

**High Road West Regeneration Proposals – Masterplan Information Pack – September 2014**

**The Historic Environment and Site Allocations in Local Plans – Historic England Advice  
Note 3**

**Historic England Heritage at Risk Register 2015**

## Introduction

1. Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). In carrying out our role in protecting and managing the historic environment, Historic England gives advice to local planning authorities on certain categories of applications (planning and listed building consent applications), appeals and other matters affecting the historic environment.
2. Historic England is consulted on Local Development Plans under the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012 and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice .
3. Historic England's representations in relation to the Pre-submission Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development and the specific policies relevant to the historic environment.
4. This statement addresses the Inspector's questions with regards to Matters 2 "Area Wide Issues". Specifically, it further clarifies Historic England's position with regards to the delivery of increased housing across the covered by the Tottenham Area Action Plan, and its potential impact upon the conservation of the historic environment in line with the Framework.

### Inspector's Question 3 – Matter 2 Issues:

**Whether it can be demonstrated that there is capacity for 10,000 new dwellings, including the necessary infrastructure to support the level of growth? Whether it can be demonstrated that a good quality environment, including local distinctiveness and protection of residents living conditions, can be maintained having regard to the propose level of growth?**

5. National policy recognises the dimensions of sustainable development, these being economic, social and environmental, with local plans expected to achieve net gains in all three (NPPF para 152). Significant adverse impacts on these dimensions should be avoided, with the conservation and enhancement of the historic environment being a core principle. This approach is supported by the National Planning Policy Guidance (NPPG) when undertaking housing land availability assessment, with Stage 2 of the "Methodology" advising that consideration should be given to potential impacts upon heritage conservation.

6. In support of national policy Historic England published *The Historic Environment and Site Allocations in Local Plans – Historic England Advice Note 3* (October 2015). The *Note* provides complementary advice on how understanding the historic environment, including the significance of heritage assets, can help achieve the successful delivery of sustainable development through Local Plan site allocations.
7. The Plan promotes through policy AAP3 the delivery of 10,000 new homes, in an area characterised by a rich heritage including numerous designated heritage assets including conservation areas, of which the majority reflect the historical development along the north-south arterial route of the Tottenham High Road, from South Tottenham in the south to White Hart Lane area in the north. This route is covered by the Tottenham High Road Historic Corridor which consists of a sequence of six conservation areas. Many of the sites identified in the AAP, which are expected to help achieve the 10,000 target of new homes, are located along this key arterial route. In particular the AAP identifies the following sites which fall within the Historic Corridor – working from the south northwards. It should be noted that the list below does not include other AAP sites which may depending on their scale and form could have an impact upon the significance of heritage assets.

Sub Area	Site Reference	Net Residential Units	Commercial/other developable space m <sup>2</sup>
Seven Sister/West Green Road	SS5	163	3,700
	SS6	63	1,600
Tottenham Green	TG2	34	2,400
	TG3	30	1,720
Bruce Grove	BG2	11	200
	BG3	49	900
	BG4	48	370
North Tottenham	NT3	472	680
	NT5	1,200	22,590
	NT7	285	37,330
total		2,456 (25% of total expected growth in net residential units)	71,490

*\*Capacity figures taken initially from table 4 of the AAP, where relevant. However it should be noted that the figures in table 4 do not always match those in the subsequent site allocation details. For example TG3 figures in table 4 match TG2 site allocation details, and BG3 has a mismatch in commercial space expected.*

8. The greatest pressure is expected to be in North Tottenham where the three sites listed propose to deliver 1,957 net residential units and 5,420 m<sup>2</sup> of commercial space. This does not include other sites such as NT4 and NT6 (collectively deliver 2,029 net residential units and 6,100 m<sup>2</sup> commercial space) which although they fall outside of the conservation area may have an impact upon the significance of designated heritage asset (including potentially other heritage assets) through effects to their setting. In addition the North Tottenham sub

area, in particular around the White Hart Lane area is identified as a Tall Buildings Growth Area, where high density development in the form of tall buildings is encouraged.

9. The North Tottenham conservation area, which contains 30 listed buildings, has been identified on the Historic England Heritage at Risk Register (inclusion on the list since 2009) as a conservation area at risk, on the grounds of its very poor condition and vulnerability to potential inappropriate development pressure.
10. In general our concern is that the key policy drivers of increased high density development throughout Tottenham could have localised impacts upon the significance of heritage assets, unless robust evidence is provided that demonstrates heritage issues are appropriately factored into potential capacity figures and development parameters. This is of greatest concern where there is a concentration of high density development in the Historic Corridor, in particular in the northern section around White Hart Lane. It is noted that Site Requirements for NT5 state that the development should accord with the principles set out in the most up-to-date Council –approved Masterplan. We assume this refers to the West High Road Masterplan approved by the council in December 2014. In our consultation response to this document (dated 31<sup>st</sup> October 2014) we raised concerns to the consideration of the historic environment in that it did not constitute a positive strategy for the conservation of heritage assets or the contribution they can make to local distinctiveness and new development. In particular we considered that a number of the main heritage principles and approaches within the draft document would fail to deliver sustainable change consistent with policies set out in the NPPF, London Plan and Haringey’s own Local Plan. It appears that the Masterplan was not been substantial amended to reflect our concerns.
11. With the above in mind it is our view that the evidence does not show sufficiently that the capacity expected from sites listed in the table above (and outside of the Historic Corridor) are deliverable without conflicting with national policy e.g. avoid the need for harm and conserve and enhance the significance of heritage assets. This view is highlighted further by the requirement of the Development Guidelines (site NT5) to undertaken detailed assessment of the significance of heritage assets where they are likely to be impacted by new developments, which suggests that the quantum of capacity expected has not been fully tested to ensure it does not cause unnecessary harm to the significance of heritage assets as required by national policy (NPPF 129, 152 and 154).
12. Historic England is not against the principle of delivering growth and introducing increased capacity. In line with the principle of delivering sustainable development as set out by national policy, proposals should be delivered where they optimise the potential of a site and its surroundings. This can be achieved by understanding the significance of heritage assets that may be impacted. This includes heritage assets both within the boundary and setting of sites allocated for development and in particular sites identified for increased capacity.

13. As raised in our response to the Submission version of the AAP policy AAP5 this includes understanding the archaeological interest of a place (in particular where developments are proposed in Archaeological Priority Areas), which is currently absent from the policy and therefore not in compliance with national policy (NPPF para 128). In addition the current wording of AAP5 expects proposals to be review Conservation Area Management Plans (CAMP), where appropriate. This is contrary to the legal requirement of local planning authorities as well as could potentially prejudice the findings of the CAMP review in favour of inappropriate development contrary to national policy.
14. Having a clear robust understanding of the significance of heritage assets, as a baseline, and then assessment of the effects of developments should then help avoid the causing of unjustified harm to the significance of heritage assets (NPPF para 129), deliver the opportunity to enhance the conservation of the historic environment (NPPF para 126), and inform the delivery of quality new build that integrates with the historic environment (NPPF para 61) as well as make a positive contribution to the local character (NPPF para's 58 & 126).

### **Recommendation**

15. In accordance with national policy and guidance, Historic England would seek to ensure further evidence is provided that demonstrates the conservation and enhancement of the historic environment has been taken into consideration when assessing the capacity of sites as part of the Council's approach of delivering both new homes and developable space in Tottenham. In particular evidence that shows how the significance of heritage assets have been assessed and considered in the calculation of site capacities. We would suggest that evidence gathered by the Council such as the *Urban Character Study* (Haringey Council - February 2015), and relevant heritage appraisal and management plans (e.g. conservation area appraisals and management plans) are used to inform this assessment of capacity. This should then be used to inform the expected scale and form of development considered appropriate for each site, that will comply with the principles of sustainable development including the conservation and enhancement of the historic environment and its heritage assets.