

#### Council Statement

##### Background

1. This statement addresses Matter 2 - Area Wide Issues for the Tottenham Area Action Plan (AAP), having particular regard to Question 3. It clarifies the Council's position on conservation and enhancement of the historic environment in the context of delivering an increase in housing and other development across the AAP area.
2. The statement has been prepared at the request of the Planning Inspector in the light of the Additional Statement submitted by Historic England (particularly paragraph 15). Historic England is seeking that the Council provides further evidence to demonstrate that the objectives for conservation and enhancement of the historic environment have been taken into account, particularly when assessing the development capacity of strategic sites allocated in the plan.
3. Paragraph 7 of the Additional Statement signposts strategic sites that fall within Tottenham's Historic Corridor, where Historic England has raised concerns with the Council's proposed indicative site development capacities. The following section of this statement sets out how the historic environment has been considered in policy preparation for these sites.
4. It is recognised that new development in the Tottenham Area will not be limited to those sites signposted by Historic England in its Additional Statement, and which are the key focus of this Council statement. It is noted that Policy AAP5 (Conservation and Heritage) includes a suite of criteria based policies against which the Council will assess planning applications, which it considers are consistent with the NPPF. As set out in AAP5, all proposals will need to have regard to relevant Conservation Area Appraisals and Management Plans.

##### Strategic sites

5. The following section discusses how objectives for conservation and enhancement of the historic environment have been considered in the assessment of site development capacities for selected site allocation policies.

Seven Sisters/West Green Road

6. **SS5 Wards Corner** - Site capacities reflect the granted planning permission for the site. Historic England objected to the scheme, arguing that substantial harm would be caused to the conservation area and that justification would be needed, having regard to NPPF paragraph 133. Haringey officers did not agree that the proposal would result in substantial harm, however determined that the public benefit of the scheme outweighed harm, thereby satisfying the tests of NPPF.
7. **SS6 Apex House** – Site capacities were derived by applying the standard methodology set out in the AAP, resulting in figures of 63 net residential units and 1,600m<sup>2</sup> of town centre floorspace. The site allocation boundary includes the neighbouring Seacole Court. The existing Apex House site is a 4-storey building comprising 3,487m<sup>2</sup> office floorspace and associated car parking to the rear. Subsequently planning permission has been granted for just the Apex House site for a 23-storey building, reducing in height to 6 and 4 storeys, adjacent to Seacole Court comprising 163

residential units and 875m<sup>2</sup> town centre floorspace. Historic England was consulted on the proposals and whilst raising no objection did set out concerns. HE comments did not categorise the harm as either substantial or less than substantial although reference in correspondence was made to 'public benefit'. Having reviewed the proposals, Council officers considered that the harm was less than substantial and accordingly, an assessment was made having regard to the public benefit, which was considered to outweigh the harm caused.

#### Tottenham Green

8. **TG2 Tottenham Chances** – Site capacities reflect the proposed site requirements which provide that development should be sensitively designed to include retention of the listed building, with extensions to rear and north considered acceptable in principle. The purpose of the allocation is to provide enabling development to retain the listed building in its existing use in accordance with NPPF and the advice received from Historic England on pre-application discussions regarding redevelopment of this site.
9. **TG3 Tottenham Police Station and Reynardson Court** – Site capacities reflect the proposed site requirement to retain the locally listed police station on Tottenham High Road. Along with retaining this building for economic use, the policy seeks to improve its setting through redevelopment of the 1980's extension to the building. New development is proposed mainly to the rear, where the Rycroft Way frontage comprises a number of single storey unattractive buildings and car parking. Planning permission has already been granted on part of the rear of the site (HGY/2013/0155) for a part 3-storey, part 4-storey building providing 64 rooms for student accommodation. Historic England did not comment on this planning application. Having regard to the acceptability of the granted scheme, a more comprehensive development of similar scale incorporating the rest of the Rycroft Road frontage, the ancillary buildings to the rear of the Police Station and the 1980's extension, would sufficiently accommodate the number of homes set out in the allocation.

#### Bruce Grove

10. **BG2 Bruce Grove Station Court** – The site capacities reflect the development potential to the rear of the site only, providing for a modest 11 units adjacent to a London Overground station. The allocation would involve the redevelopment of a builder's yard which is considered to contribute little to the value of the conservation area. The site on Moorefield Road overlooks another builder's yard and the Post Office sorting centre, which again, are not considered to add to character and value of the conservation area and are therefore also proposed for redevelopment (BG4).
11. **BG3 Bruce Grove Snooker Hall and Banqueting Suite** - The site allocation aims to remove the existing blank facade, which is detrimental to the conservation area, and replace this with a new frontage which better complements the heritage assets to north, south and across the road. A requirement of the allocation to bring these heritage assets back into active use and to retain and restore the Grade II listed public toilet building. The capacities indicated are modest having regard to the site's location adjacent to Bruce Grove Station and within a District Town Centre. They reflect the heritage assets on site and within the surrounds, and the need for sensitive development to complement these (utilising upper floors for conversion and the large area to the rear of the building that adjoins the railway line).
12. **BG4 Tottenham Delivery Office** – As discussed above (BG2) the capacities are set having regard to the site's limited contribution to local and historic character, and opportunities for

redevelopment to enhance the setting of heritage assets along Bruce Grove, along with access improvements in a town centre location.

#### North Tottenham

13. **NT3 Northumberland Park** – Beyond the shopping parade on the High Street and the frontage along Northumberland Park, the site comprises mainly long linear blocks of 3-storey housing estate buildings, including at the top end of the High Road. These buildings are of little architectural or historic merit and detract from the conservation area. At almost 5 hectares, the site provides a significant opportunity to improve the residential amenity of the backland area behind the High Road, with mid-rise densities considered appropriate to ensure the new development does not compromise the visual setting of the historic environment when viewed from the High Road. The indicative site capacity, for an uplift of 472 units, is considered modest in the context of the site size and its accessibility, whilst also noting the requirement to replace the existing affordable housing on an equivalent floorspace basis.
  
14. **NT5 High Road West** – The site capacities reflect those which have been established through the detailed work undertaken in preparing the site-wide masterplan for the area. It should be noted that the figure of 1,200 units is lower than that derived using the conservative standard methodology applied throughout the Site Allocations DPD and TAAP (1,046 units + 222 units already delivered at Brook House = 1,268 units). It is also noted in the High Road West Masterplan that the heritage assets are limited to the buildings fronting the High Road and fronting the north side of White Hart Lane. It is therefore considered that the setting of the heritage assets is in respect of views from the High Street back towards the railway rather than from within the site. As with NT3, the site is significantly large at 11.8 hectares, and so provides ample development potential to the rear of the High Street, where there is already a context for the provision of taller and tall buildings. As set out in the NT5 site allocation requirements, development should accord with the principles set out in the HRW masterplan. Page 104, Section 3.4 of the HRW masterplan sets out the key heritage principles as follows:
  - Preserve and enhance the character of the Conservation Area as a whole (noting again that this extends only along the High Street and the frontages along White Hart Lane);
  - Demonstrate how heritage significance of the existing assets have been incorporated and reinforced including establishing their significance based on the key conservation principles by English Heritage – Evidential, Historic, Aesthetic and Communal value;
  - Promote the adaptable reuse of heritage assets with appropriate future uses identifying how various individual buildings will be used, what works they will require including restoration and refurbishment works to adapt to the proposed use;
  - Demolition can be considered (subject to a Conservation Appraisal\*) where the benefits of change and sympathetic new development can enhance the overall viability of wider development as well as, crucially, support the viability and attractiveness for investment into the future of other heritage buildings in the area;
  - The impact of the loss of heritage assets on the wider conservation area and the positive contribution to the appearance and setting of retained heritage assets should be demonstrated.

15. The Council considers that these principles, alongside the existing precedents of taller and tall buildings and the substantial site area, mean that the indicative capacity for an uplift of 1,200 net new homes is considered deliverable without detrimentally impacting upon the heritage values present.
16. **NT7 Tottenham Hotspur Stadium** – It is acknowledged that the stadium development would adversely impact on the heritage assets present on the site. However, in granting planning permission, the Council weighed such impacts against the wider public benefits of development and determined that the loss was justified in respect of the requirements in the NPPF. The indicative development capacity represents the previously granted planning permission for the site. The most recent permission granted in 2016 (HGY/2015/3000) makes provision for 585 residential units.

#### **Conservation Area Appraisals and Management Plans**

17. It should be noted that the Council has employed independent consultants to undertake updated conservation area appraisals and management plans for the six Tottenham High Street Conservation Areas. These are due to be reported to Cabinet in September 2016 for approval to publish for public consultation. In accordance with Policy AAP5, when considering the impact of proposals on the historic environment of the Tottenham High Street the Council will have regard to these updated Conservation Area Appraisals and Management Plans.