

Local Plan Consultation  
Planning Policy  
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**4<sup>th</sup> March 2016**

Dear Sir/Madam,

**Alterations to the Strategic Policies, Development Management DPD, Site Allocations DPD and Tottenham Area Action Plan – Pre Submission January 2016**

Thank you for consulting Historic England on the pre-submission versions of the alterations to the Strategic Policies, Development Management DPD, Site Allocations DPD and Tottenham Area Action Plan.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the development plan process. Accordingly we welcome the opportunity to comment on the above consultation documents. It should be noted that our comments are provided in the context of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) and Historic England's Good Practice Advice (GPA) notes, specifically in relation to Local Plans (GPA1) and our guidance on Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (web link - <https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>).



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In addition our comments are provided in the context of the points previously raised on the above documents in our letters dated 9<sup>th</sup> March 2015 (Tottenham Area Action Plan only) 27<sup>th</sup> March 2015 (other DPDs).

Our headline comments on the consultation documents are set out below:

## **Supporting Evidence**

### **Housing**

It is noted that the evidence provided, to support the uplift in expected capacity, is the Mayor's Strategic Housing Land Availability Assessment 2013. This document summarises Haringey nominal capacity figures with that of the other Boroughs in London and does not provide site specific details, which can demonstrate robustly that the housing growth expected to be delivered in the life of the plan can be achieved. In particular it does not demonstrate the potential impact upon the historic environment as a result of the uplift in expected capacity. This is a point previously raised in our response to the 2015 version of the plan (letter dated 27<sup>th</sup> March 2015). We accept that there is increasing pressure to deliver more homes and growth, but our concern is the lack of evidence that provides assurances that the identification of additional capacity from sites will not cause unjustified harm to the significance of heritage assets (where there is potential impact). We would seek further clarification to ensure the principles of sustainable development including the delivery of net gain for all three dimensions (economic, social and environmental) are equally achieved (NPPF paragraph 152). In particular we are seeking to avoid significant adverse impacts on any of these dimensions including the historic environment as a result of the changes in the capacity figures.

### **Tall Buildings**

We note that the Council have developed supporting evidence entitled 'Potential Tall Buildings Locations Validations Study' (November 2015) which seeks to justify the location of tall buildings in the Borough. In general we welcome the Council's commitment to developing this evidence. However there are concerns with regards to how the historic environment is considered. In particular the document does not consider robustly the significance of heritage assets, but limits itself to baseline information from the Borough's characterisation study and conservation area appraisals. This approach therefore does not take account of the tests that will be used when considering potential harm to heritage assets when developments such as tall buildings are proposed.

In addition we would suggest that Historic England's Good Practice Advice Note (GPA3) on Setting of Heritage Assets dated March 2015 should be reviewed and used to inform the evidence presented. In particular as this GPA focuses on the setting of heritage assets and the contribution a surrounding contributes to the significance of heritage assets. This could include views, but not exclusively. In reviewing the evidence provided it is clear that specific views are considered, but not the setting of heritage assets, and the contribution they make to the significance of the heritage asset. This omission in the evidence is contrary to our revised Guidance on Tall Buildings, GPA3 and national policy. This deficiency is reflected in the principles identified (for place-making, character and views), and the details of the area specific Summary of Initial Findings.



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It is however noted that the significance of heritage assets and their settings is incorporated as a general design requirement for 'taller' and 'tall' building proposals in Policy DM6 Building Heights (point B. c and C). This is welcomed however it is not clear on whether the concept of significance and setting of heritage assets was considered in the identification of appropriate locations for 'tall' buildings. At present this appears not to be the case and as such the evidence is incomplete and not fully compliant with national policy, Guidance on Tall Buildings, and GPA3. This deficiency should be addressed.

Finally the literature review considers an old version of the CABE/Historic England (formerly English Heritage Guidance on Tall Buildings. The version considered is 2007, which has now been superseded by a revised publication dated December 2015 – link below:

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

### **Alterations to the Strategic Policies**

On a general point it is essential that there is consistency in the treatment of local charter and historic context when considering the delivery of growth in defined areas. The three areas identified of Area of Change, Growth Areas and other areas (i.e. Areas of Limited Change) have different approaches in how they consider the integration and consideration of existing contextual qualities of a place. This includes respecting the historic context.

The reference below helps illustrate this point further.

#### *Alt 30 3.1 Policy SP1: Managing Growth*

We note that the Council will expect development in the Growth Areas to maximise site opportunities, for areas such as North Tottenham and Tottenham Hale. Our concern is that the use of 'maximise' in this context could be contrary to the delivery of balanced sustainable developments in line with national policy (NPPF) e.g. consideration of environmental characteristics such as the heritage interests that should influence the development of sites. As an alternative, and to reflect both the NPPF and London Plan, the wording should be amended so that it focuses on *optimising* site potential rather than maximise. This approach would reflect the wording used in the later part of the policy when an explicit reference is made to change respecting the character of its surroundings.

It is noted that the Council are bring forward a programme to improve and renew its own housing estates, in order to improving their quality and numbers of homes. Priority is given to estates that are within wider regeneration proposals (Policy SP2 Housing, and paragraph 3.2.29). We would seek assurances that as part of the process of designing and implementing change, that the potential heritage interest of each estate is fully identified, understood, and used (where recognised) in line with the principles of sustainable development. As an aid to ensuring the process of renewal is delivered effectively we would encourage the Council to work collaboratively with Historic England in identifying any potential heritage interest.



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## **Development Management DPD**

### *Policy DM6: Building Heights*

We welcome the inclusion of the significance of heritage assets and their settings as a design requirement when assessing proposals for both ‘taller’ and ‘tall’ buildings. However it is important to ensure consistency in the evidence used to support both forms of tall buildings. For example paragraph 2.42 states that Council’s approach to Tall buildings has been informed by their own Urban Characterisation Study and the Tall Buildings Location Validation Study. This implies that there is no evidence to support the concept and potential location of ‘taller’ buildings. This raises concerns on the robustness of this aspect of the policy and its deliverability without causing potential harm to heritage interests. Further clarification is needed on this important aspect.

### *Policy DM5: Locally Significant Views and Vistas*

Paragraph 2.35 should be amended to include both Conservation Area Management Plans and Appraisals, as a source of views that proposals need to be considered.

### *Policy DM9: Management of the Historic Environment*

In general the policy provides a useful framework in which to manage Haringey’s historic environment. However, in its current form insufficient guidance is given on how to treat issues around potential harm to the significance of heritage assets. In particular it does not consider the level of harm that could be caused, its relationship with the significance of the heritage asset (as potentially expressed in its grade and type) and the reason when harm may be justified. It is noted with interest that this issue has been addressed in the Tottenham AAP (policy AAP5) but not carried forward in this borough wide policy. This aspect is a key requirement of the NPPF (e.g. as expressed in paragraphs 132-135), which needs to be recognised in the context of the whole Local Plan not in specific parts (as currently presented).

In addition the policy does not consider open spaces that have heritage interest. In particular registered parks and gardens (e.g. four designated RP&G in the borough), and other open spaces that may have been identified by the London Parks and Gardens Trust (link below) and the issues that need to be considered to ensure their significance is appropriately conserved and enhanced.

(web link to the LP&GT - <http://www.londongardensonline.org.uk/select-borough-results.asp?Borough=Haringey&Submit=Go>)

Under part I (archaeology) we would seek to ensure all assessments are published, therefore enabling dissemination of findings to all. In addition it should be noted that with the support of the Mayor, the Greater London Archaeological Advisory Service is conducting a review of all the London Borough's Archaeological Priority Areas to ensure that they provide a consistent and up to date evidence base for Local Plans. Haringey's APAs have not been reviewed for many years so may no longer be a reliable indication of archaeological significance and potential. The review of Haringey's APAs is currently timetabled for 2022 although we would welcome funded arrangements for accelerating the service.



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*Managing Haringey's Heritage Assets - Archaeology* paragraph 2.75 line 8 - the word 'assessment' should be replaced with 'evaluation', and line 15-need to substituted 'archiving' with 'publication and deposition in an appropriate designated museum'.

*Paragraph 2.76* clarification: the Greater London Archaeological Advisory Service is part of Historic England, so 'and where appropriate' could be deleted.

*Policy DM45: Maximising the use of town centre land and floorspace*

We would strongly suggest that this policy should seek to optimise land in town centres as oppose to maximise. By optimising you are recognising that there are other factors to consider which will influence the degree and form of the change being encouraged. In particular the capacity of heritage assets to accommodate change without causing harm to their significance. This is a challenge which is likely to occur in the Borough's town centres, where there is a greater likelihood of heritage assets being present. This balanced approach reflects the NPPF's principles of delivering sustainable development.

*Policy DM48: Use of Planning Obligations*

As part of the Council's commitment and strategy for the historic environment in Haringey, we would strongly suggest that heritage assets are identified as a potential beneficiary from s106. This could include infrastructure structures and buildings that contain heritage interest or are covered by heritage designation.

*Policy DM50: Public houses*

It should be noted that many public houses are of heritage interest and may be recognised as heritage assets. In these circumstances we would seek to ensure the test for redevelopment of changes of use will take into account the potential impacts upon the significance of the heritage asset. This is point is not recognised in the policy or supporting text.

*Policy DM52: Burial Space*

As with the policy DM52, it should be noted that many burial spaces are of heritage interest and may be recognised as heritage assets. In these circumstances we would seek to ensure the test for re use will take into account the potential impacts upon the significance of the heritage asset (including archaeological interest). This is point is not recognised in the policy or supporting text.

*Policy DM55: Regeneration/masterplanning*

We support the inclusion of a policy that encourages the preparation of masterplans for site allocations and beyond. In the details of the policy or supporting text we would urge you to ensure that the accompanying masterplans include a thorough understanding of the historic environment, heritage assets, and their significance including setting. This baseline information of values and understanding should then be used to inform the principles of development articulated in the final masterplan. By including this aspect in the Council's expectations of masterplanning, would help align the policy with the NPPF and in particular paragraphs 58-61, and its reference to responding to local character and history, reinforcing local distinctiveness, and addressing integration of new developments with the historic environment.



## Site Allocations DPD

*Wood Green Tall building clusters* – It is noted that throughout the document ‘*tall building clusters*’ are identified. We would suggest that the title of these sections should be amended to ‘*potential tall building clusters*’ as the supporting policy DM6 and the supporting text in the site allocations clearly outline that these locations may be appropriate for tall buildings subject to further considerations. Further clarification could be provided through site allocations that fall within the ‘*cluster*’ areas, as the details provided do not specify limitations on height levels or bulk.

*SA9: Mecca Bingo & SA12: The Mall*– the Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Noel Park conservation area and its significance.

*SA11: Wood Green Library* – for consistency purpose the same details should be provided on this site as expressed for SA10, with regards to the setting of the Gaumont Cinema

*SA19: Wood Green Cultural Quarter (south)* - the Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Wood Green Common conservation area and its significance.

*SA28: St Ann’s Hospital Site* – we note that the Site Requirements advise that developments should preserve or enhance the appearance of the St Ann’s conservation area ‘as per statutory requirements’. We would suggest that this should be rephrased to ensuring developments conserve and enhance the significance of the conservation area and its setting. This approach reflects closely the NPPF and places a requirement upon understand the significance of the conservation area as part of the development process whether this is expressed in the conservation area appraisal and guided by an up to date management plan, or in a supporting planning application document . This approach should be applied to all other site allocations where there are heritage assets that could be affected by development e.g. sites that fall within or setting of heritage assets such as Highgate conservation area.

*SA37: 18-20 Stroud Green* - the Development Guidelines and Site Requirements should reference the need to contribute positively to the adjoining Stroud Green conservation area and its significance.

*SA38 460-470 Archway Road & other sites in the Highgate conservation area* – it is important to ensure consistency in the guidance provided. For example the details provided on the Highgate conservation area and the need for development to respond to its significance is not expressed consistently between SA38 & SA39 e.g. Site Requirement for SA38 makes no reference to the conservation area, yet SA39 does. SA38 considers these issues in the Development Guidelines only.

*SA41 Highgate School* – it is important that where there are any listed buildings whether locally or statutorily defined details of their significance and capability to accommodate change should be described. This is relevant for this site, where there is a mixture of listed



buildings and other site allocations e.g. SA42, SA44, etc... In addition it should be noted that the site falls within an area that possibly be a medieval settlement and recorded pre-school chapel. We would therefore suggest that the Site Requirements highlight the potential for significant archaeology.

*SA46: Hornsey Depot* – the Development Guidelines and Site Requirements should reference the need to contribute positively to the Hornsey conservation area and its significance.

*SA48: Hornsey Town Hall* – the wording of the Site Requirements need to be amended in the context of enabling development. The significance of the Town Hall should be the primary consideration when assessing the appropriateness of new development in its setting, thus reflecting the NPPF.

*SA50: St Luke's Hospital* – the Development Guidelines and Site Requirements should reference the need to contribute positively to the Muswell Hill conservation area and its significance. In addition the setting of the statutorily and locally listed building, and their significance should be highlighted as a development consideration.

*SA53: Alexandra Palace* – the Development Guidelines should be expanded in relation to any proposed works to the listed building. Currently the wording focuses on not harming the historic fabric of the building and the need to be sensitive to it. This should be expanded to include the need to avoid harm to the significance of the listed building, thus taking into account other heritage interests associated with the Palace and which supports its designation as a grade I listed building. In addition it would be useful to link the guidelines to any supporting documentation that describes the significance of the Palace and the surrounding gardens.

*SA 64 The Roundway* – it is noted that the site allocation is located opposite Bruce Castle Museum and within the historic medieval core We therefore would suggest that the site requirements are amended to include a reference to the potential for significant archaeology.

### **Tottenham Area Action Plan**

*Policy AAP5 A.* This policy appears to state that ‘*proposals for new development will be required to review ... Conservation Area Management Plans where appropriate, including reviewing existing boundaries*’. This implies that new development will engage in the process of reviewing conservation management plans and boundaries. The responsibility for conservation area designation and management lies with the local planning authority as set out in the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990. The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed.

In addition it should be noted that the AAP and several of the site allocations identified overlap with the Tottenham High Road APA's and the Lea Valley APA. It is with concern that Policy AAP5 does not include a reference to archaeology or Archaeological Priority Areas. This needs to be addressed so that the policy considers expected development



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issues. For example paragraphs referring to archaeology and Archaeological Priority Areas and Policy DM9 Management of the Historic Environment and the process of consultation, submission of Desk-based Assessments and the preference for the preservation and management of archaeological heritage assets in-situ should be added to policy AAP5 and reflected in the site allocations where there are overlaps with APAs.

*Policy AAP8: Development Along Tottenham High Road* - part F of the policy states that ‘Opportunities to create new space for enterprise and commercial uses to the rear properties fronting the High Road will be permitted’. This policy appears ill defined. There are a significant number of designated heritage assets which front the High Road. The consideration of alterations to boundaries and curtilage structures would require consideration against policies for designated heritage assets and their settings. In addition employment uses may be incompatible with the current use of the frontage building. The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed or revised.

*Site Allocation NT5 High Road* - the Site Requirement appears to give statutory weight to the West High Road Masterplan Framework, which is a non-statutory document. The Site Requirements state that “The regeneration of heritage assets should be considered where the benefits of change and sympathetic development can enhance the overall feasibility and benefit of future investment into the future of heritage buildings in the area”. This does not comply with the NPPF paragraphs 132 to 135 in respect of harm to designated and undesignated heritage assets and does not constitute a positive strategy as set out in paragraph 126 of the NPPF. The inclusion of the above policy is in conflict with national policy and would make the plan unsound. It should therefore be removed.

We also note that no mention appears to be made of the Archaeological Priority Areas within the proposed AAP area. As the need to address archaeological issues arising in these areas is likely to be a consideration for future development proposals we would recommend that a reference to the Local Authorities borough wide-policy for archaeology is included.

#### *Additional General observations*

*Heritage and cultural assets paragraph 2.50* - we would suggest that it would be helpful to state the area contains a ‘large’ number of listed buildings. This would be consistent with 2.51 which states ‘there remains a large number of heritage assets across the AAP area on the Heritage at Risk Register’.

*Heritage at Risk paragraph 2.55* - in identifying that Historic England ‘has included several of the listed buildings in the Heritage at Risk Register’ it would be appropriate to clarify that this is compiled on information provided by the local authority. This statement reoccurs at a number of locations within the text.

*Objective 8: Enhancement of heritage assets paragraph 3.18* - we would suggest ‘wear and tear’ is replaced by ‘are in very bad and vulnerable condition, underused and in many case face an uncertain future’. This better reflects the reasons for inclusion on the register.



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*Policy AAP6 Urban Design Character Including Tall Buildings* - part A of the policy states that “Tottenham’s Growth Areas provide the opportunity to establish a new urban character in these areas”. We would therefore recommend that this is amended to read ‘*The significant change planned for Tottenham’s Growth Areas provides the opportunities to establish a new and contextual urban character for these areas*’. The reason for this is that the Growth Areas as identified in Figure 3.1 (page 33) encompass areas of conservation area, designated heritage assets, and areas of local character and identity. This change will better reflect Policy AAP5 that proposals for new development will be required to: a. ‘*reflect relevant character appraisals and management plans for the area*’; and b: the need to respond ‘*sensitively to the distinctive character and significance of heritage assets*’.

In addition Policy AAP6 refers to ‘*Taller*’ buildings (2 to 3 storeys taller than existing context) rather than ‘*Tall*’ buildings (10+ storeys), the definition of which is set out in the Local Plan Development Management Policies (DM6). It would be helpful to clarify the differentiation within this document.

#### *Neighbourhood Areas and Opportunity Sites –*

As general rule it is noted that in this section identifies and discusses wider heritage, townscape and character issues but does not mention archaeology and Archaeological Priority Areas. Due to the archaeological sensitivities this heritage issues should be referenced and highlighted in the text. For example paragraphs referring to archaeology and Archaeological Priority Areas and Policy DM9 Management of the Historic Environment and the process of consultation, submission of Desk-based Assessments and the preference for the preservation and management of archaeological heritage assets in-situ should be added to each of the areas within the Tottenham AAP have allocated sites which overlap with the current Archaeological Priority Areas.

*Bruce Grove Sub Area* - the text in paragraphs 5.56 and 5.66 appear to contradict each other through referring ‘*to buildings of varying scale, origin and design and the High Road is primarily fronted by three and four storey Victorian buildings*’. This should be clarified.

*Improvement Sites Paragraph 5.67* - in addition to the reference to locally listed buildings there are a significant number of buildings making a positive contribution to the conservation area and a number of grade II listed buildings requiring repair, and the viable reuse.

*North Tottenham Neighbourhood Area Urban Realm Improvements paragraph 5.94* – the reference to “safety” in the final paragraph is unclear. This needs to be clarified.

We would like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where Historic England consider it appropriate to do so.



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In the meantime, once you have considered the details of our response, I would be happy to meet to discuss further on how this important documents can be amended to reflect our comments and subsequently be implemented. With this in mind please do not hesitate to contact me.

Yours faithfully,



**Graham Saunders**  
**Principal Adviser - Historic Environment Planning - London**



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