



ENGLISH HERITAGE

London Office

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Your Ref:

Our Ref: HD/P5015/18

By email. ldf@haringey.gov.uk

Date: 9 March 2015

Dear Ms Oruwari

Tottenham Area Action Plans Regulation 18 Consultation Document

Thank you for inviting comments on the Tottenham Area Action Plan (AAP) Regulation 18 Consultation Document. As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and therefore welcomes the opportunity to comment on this planning document.

Introduction

Under consideration is the proposed production of an AAP for Tottenham, setting out policies, proposals and site allocations for future development within Tottenham, based around the four neighbourhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, and North Tottenham.

The AAP boundary includes nine conservation areas and numerous listed and locally listed buildings (designated and undesignated heritage assets). A significant number of designated heritage assets are identified on English Heritage's Heritage at Risk Register (compiled through information supplied by the council), including eight listed buildings, and four conservation areas at: Bruce Grove; Scotland Green; North Tottenham High Road; and Clyde Circus.

Addressing the condition of designated heritage assets and the longer term management of the historic environment in Tottenham is therefore a high priority for English Heritage. In line with the National Planning Policy Framework (NPPF) we would advise that the proposed AAP sets out a positive strategy which ensures the wider regeneration aims deliver jointly and simultaneously economic, social and



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environmental benefits (NPPF paragraph 8). This includes positive improvements in the quality of the historic environment (NPPF paragraph 9).

In September 2014 English Heritage's London Advisory Committee (LAC) visited Tottenham to provide advice in respect of how the Tottenham AAP could meet the growth and regeneration challenges faced by the area whilst developing a positive strategy for the historic environment. The recommendations of the Committee were sent to the Council in November 2014.

We have reviewed the consultation documents in light of the above concerns and the NPPF, which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (NPPF paragraph 126). Having reviewed the Draft AAP we would advise the following:

English Heritage Advice

Whilst English Heritage supports the need for policies to promote economic and residential growth, we consider that the AAP can be strengthened through more explicit acknowledgement of the role of Tottenham's rich historic environment in promoting a positive and attractive neighbourhood character, whilst helping to ensure growth creates a sense of place and community. The main issues we consider need to be addressed are set out below and our detailed comments in respect of the text are set out in Appendix 1.

- The Historic Environment is identified in the consultation outcomes and the Future Vision for Tottenham as a key driver for change and regeneration. This needs to be developed into an overarching, proactive approach to identify and seek opportunities for greater investment in the areas heritage assets. This aim should then be reflected in the strategic objectives and regeneration policies.
- The Urban Character Study 2015 provides a thorough assessment of local neighbourhoods and character areas at a relatively detailed level. This identifies a number of themes including the historic importance of the High Road, and identifies additional local heritage assets and features which contribute to a sense of character and place. These findings need to be integrated and used in the policies and actions of the AAP.
- The AAP needs to identify and reflect the distinctive smaller character based neighbourhoods, as set out in the Urban Character Study. As key evidence the Study should be used to develop a sensitive approach to local character, not fully evident in the AAP, supported by the Plans spatial strategies, and key neighbourhood area objectives. For example the AAP should introduce local, detailed strategies to co-ordinate regeneration so that it enhances local distinctiveness.
- The AAP identifies the need to improve the quality of existing housing stock. This relates principally to post-war redevelopment which severed permeable street patterns and provided low quality buildings which did not respond to the



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pervading urban grain. A key message of the LAC visit to Tottenham was the need for higher quality contextual design, as it was noted that recent new developments did not address existing issues of poor permeability or unattractive character. The AAP needs to set out how aspirations for a desirable and attractive built environment and “a different kind of housing market” will be achieved. The Spatial Strategy identifies the importance and need to enhance heritage assets at Tottenham Green and Bruce Grove. However the Strategy needs to recognise the wider distribution of heritage assets, the importance of the High Road, and in particularly important concentrations of assets in areas such as North Tottenham. Many of these areas require positive action to bring to beneficial use and address their “at risk” status, which the AAP could help deliver.

- English Heritage recognises the economic benefits of development of a district centre around Tottenham Hale. However, this currently offers a very different retail offer to the other centres and as such it will be important to ensure that the growth of a new district centre and mix of uses does not impact harmfully on the existing High Road commercial centres. In our view, the Council should seek to develop strategies which underpin the character and retail attractiveness of its existing historic retail centres and the importance of the High Road.

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Additional general observations

Evidence Base:

We strongly advise that the evidence base identified for the AAP needs to be strengthened in line with paragraph 169 of the NPPF. A number of the documents require updating and we have raised concerns in respect of the guidance set out in the High Road West Masterplan, potentially conflicting with the NPPF in respect of harm to heritage assets. We were not consulted on a number of the other strategies and cannot therefore comment at this stage on their approach to the historic environment. The Council’s Conservation Area Appraisals are omitted and would benefit from inclusion. Although these would benefit from updating their omission from the Evidence Base Studies is of concern as these provide detailed advice which is supplemented by the Haringey Urban Characterisation Study. We would also recommend reference to the Heritage at Risk Register 2014.

Sustainability Appraisal:

The Interim Sustainability Appraisal (SA) which has been published alongside the AAP sets out two strategic options for growth. Section 17.13 of the Sustainability Appraisal (SA) for the Draft AAP states that the proposed policies are likely to have a relatively small impact on townscape and cultural heritage issues (consummate with a “no plan” baseline impact). Therefore reliance is placed upon existing Development Management policies to manage change. We would advise that this approach does not reflect the need in the NPPF to set out a positive strategy for the conservation and enjoyment of the historic environment. In our view failure to appropriately identify and plan for the conservation and enhancement of the historic environment within the AAP may result in development which does not address all 12 principles for sustainable development. The SA in weighing both options considers similar unclear outcomes for both options and does not appear to be based on accurate information,



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identifying only North Tottenham as “at risk” on English Heritage’s Register of Heritage Assets at Risk, and referring rather opaquely to “several” high quality listed and local buildings.

The AAP is also an important opportunity to protect conservation-led regeneration that has already been carried out in the area, and to help encourage the momentum of investment into the area’s historic environment, alongside the broader aims for economic and housing regeneration. We would therefore urge the Council to better integrate this aim into the AAP.

In addition, we are aware that consultations in respect of a co-ordinated super cycle highway from North Tottenham to the City are under discussion which may provide opportunities for associated public realm works (potentially including integration with the High Road West Masterplan). This does not appear to be identified in the AAP.

English Heritage would strongly advise that the Borough’s own conservation staff are closely involved throughout the preparation and implementation of the Area Action Plans, as they are often best placed to advise on local historic environment issues and priorities, sources of data and consideration of options relating to the historic environment.

We would be keen to continue working constructively with the Council to achieve these aims and would welcome the opportunity to discuss the above suggestions and how the AAP can better achieve its future vision for Tottenham.

We look forward to hearing from you in the near future, in the meantime if you need any further clarification on the points raised then please do get back to me.

Yours sincerely

Richard Parish
Historic Places Advisor - LONDON



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Appendix 1: Tottenham Area Action Plans Regulation 18 Consultation Document

Page 11. Previous consultation outcomes. Para. 1.17 In respect of the statement “A desire to see distinctiveness existing character of neighbourhoods retained and preserved, including local heritage”, we would suggest that the term “designated and undesignated local heritage assets” is used in order (to more closely tie this to the policies set out the NPPF).

Page 11. Para 1.19 We responded in detail to the High Road West Consultation (this was submitted after the consultation date at the Council’s agreement as we were not initially consulted). Our letter of 31 October 2014 to Sarah Lovell sets out our concerns and observations.

Page 15. Tottenham Today. Para 2.2. The AAP area encompasses significant development from the early 18th Century and many of the most important heritage assets date from that period. We would recommend this paragraph is edited to reflect the wider historic and architectural significance of heritage assets within the plan area, to better reflect Tottenham’s rich historic built legacy. It may also be worth acknowledging the harm to character and amenity caused by much of the planned post war development which was poorly designed and severed local through road connections. An issue which the council wishes to address, particularly at Northumberland Park and High Road West (alternatively this could be identified at para. 2.25.).

Page 15. Para 2.6. We would recommend referring to the Historic Tottenham Town Hall “complex” to encompass the important civic group which includes the listed former fire station and public baths buildings.

Page 18. Economy Para 2.16. We would suggest referring to Bruce Grove as the historic centre for retail, reflecting its former prominence, its retail designation, and the neighbourhood characteristics identifies in the site allocations section.

Page 21. Heritage and cultural assets. Para 2.35. We are pleased to note the acknowledgement of the importance of heritage and cultural assets. We would suggest that the AAP needs to ensure heritage assets are appropriately identified and that new development should seek opportunities to enhance both heritage assets and their setting, whilst putting them to viable uses consistent with their conservation (as set out in NPPF Para. 131). The area includes numerous heritage assets “at risk” from neglect and poor condition which would benefit from a positive, proactive approach, beyond “integration” into new developments. This could include repair, adaptation and, where appropriate reuse to secure the best long term viable use. Some of these assets are identified in the site allocations, however the proposed AAP would benefit from an overarching commitment to a positive strategy to address the condition of the historic environment through working with partners, including developers, English Heritage, the GLA, HLF, Charities and Trusts.

When English Heritage’s London Advisory Committee visited Tottenham in September 2014 they set out a number of recommendations. These included.



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1. The need to reflect the smaller character based neighbourhoods and develop local level strategies;
2. Develop clear vision and prioritised aims for local neighbourhoods ;
The need to pro-actively seek out opportunities to reinforce local identity
3. Set clear policies for strengthening the High Road as the centre of activity through a better contextual design approach, with investment in design skills at officer and member level.
4. Develop new approaches to build understanding and interest in local character with local communities.

Page 23. A Future Vision for Tottenham. We support the aspiration for “Tottenham to be a unique place of beauty and interest as its historic character and natural environment is enhanced through investment and high quality and low-carbon building and space design”. However this will only be achieved if the poor condition of the environment and quality of new design is addressed.

Page 26. Objective Great Places. Para 3.7. The Council needs to develop the objective of recognising and enhancing the historic environment into policy and through seeking to address “at risk” status and ensuring that new investment addresses existing issues of neglect and disrepair.

Page 29. Para 3.17 Bruce Grove has been the subject of on-going conservation-led regeneration for many years but remains at risk, following damage during the riots and a number of designated heritage assets at risk. Co-ordinated public realm works, high quality design, enforcement and strategic improvement of targeted buildings are required to help address this. We would encourage the Council to work with partners to set out how this can be achieved, setting out specific goals to address the issues identified..

Page 29. Para 3.18. The public realm works at Tottenham Green need to co-ordinate with the proposed Cycle Super-Highway.

Page 36 and Page 37 Tottenham Hale Business District . The Council’s Urban Characterization Study 2015 identifies potential local heritage assets which should be formerly identified. The Council should seek to identify opportunities to better reveal their significance and their contribution to local character and distinctiveness. In addition we would recommend that new developments should ensure that they avoid a wall of development blocking views into the Lee Valley and seek opportunities to expand visual permeability and access to one of Tottenham’s great assets, the Lee Valley Park.

Page 41 Section 5 Neighbourhood Areas and Opportunity Sites.

We recognise this section largely sets out the site allocations but identifies large neighbourhoods which encompass varied local character. As such the neighbourhood analysis would benefit from greater detail informed by the Urban Character Study. It would be useful to clarify the split with the Site Allocations document.

Para 5.8 We would recommend alteration of the final sentence along the following lines “Any new development must seek opportunities and demonstrate how it enhances the historic character and setting of the area”.



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Para 5.8 We would recommend the final sentence states. The area is significantly enriched by a number of prominent listed buildings and includes the Tottenham Green, Seven Sisters, and Clyde Circus conservation areas.

Page 50 and page 54. Site requirements para 50 and SS5. Re. the requirement to preserve or enhance, we would suggest deleting “as per the statutory requirements”. This implies a minimum standard of design in this context. It would be helpful to identify any design guidance or proposed strategy which will ensure high design quality in this location.

Page 64 Given the production separate Masterplans for Northumberland Park and High Road West we would question whether the section for High Road West would be better located at page 73 next to its site allocation. The section does not adequately define the different character areas with the relationship to the High Road with its extensive conservation area and historic building concentrations (some at risk) in the west and the different character areas towards the Lee Valley. There are significant opportunities for the enhancement of designated and undesignated heritage assets across the neighbourhoods, with the need to develop an up to date evidence base informed by the Urban Characterization Study 2015.

Page 65. 5.12.8. The existing football stadium is set back from the High Road and conservation area. It is considered to detract from the character and appearance of the conservation area although historically and culturally it is an important part of the character of the area. The “match day economy” does effect the area and the Club holds a significant number of buildings including designated heritage assets which are in need of repair and reuse. The impact on the area will change significantly with the construction of the new stadium. The wider regeneration and redevelopment project should seek opportunities to address the disuse of properties owned by the club and seek wider opportunities to enhance the character of the conservation area and the aspiration for a major new cultural destination. We would consider a key objective for this neighbourhood area should be to address the at risk status of designated heritage assets and enhance the historic character of the area. Reference to the proposed HLF scheme for north Tottenham would help to demonstrate the council is taking a proactive approach in this respect, and could be developed to set out a positive complimentary conservation-led regeneration approach alongside new development.

Page 72 Site Requirements. It may be helpful to refer to the Northumberland Park Masterplan in this section.

Page 72. Development Guidelines - We would suggest that a guideline that new development should contribute to greater permeability and legible streets should be included.

Page 74. NT3. Site Requirements. In our response to the Masterplan framework for High Road West we raised concerns in respect of potential conflict with the NPPF and the principles for demolition of heritage assets, and its failure to promote a positive strategy for the historic environment. The AAP is an opportunity to set out a more positive vision which supports all aspects of sustainability. The aspirations also



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need to be balanced with the economic viability of the High Road retail offer and the provision of a coherent and attractive new communities and retail opportunities.

The requirement to “regenerate heritage assets where the benefits of change and development can enhance overall viability for future investment of heritage benefits” does not make sense and appears restrictive. The NPPF does not include policies which make a presumption against investment in the historic environment on the basis of future investment opportunities. This needs clarification and should not prevent opportunities to address long term neglect or “at risk” status of heritage assets.

Page 75. The height of new development on the High Road should enhance the character of the conservation area, and the setting of designated heritage assets. Whilst new development potentially needs to respond positively to the new environment created by the proposed new stadium, this is not yet built. In addition its scale and harmful impact on heritage assets, was justified by the promised, exceptional, wider public benefits and design mitigation. Other proposals for the High Road therefore need to be considered in respect of their own merits and should be subject to rigorous design review and clear guidance to ensure that they strengthen local character and enhance the conservation area. This will require proactive involvement of the council and its partners to help coordinate development in a positive manner.

Page 79. NT5 Future Planning Requirements. We would recommend a positive strategy for restoring and enhancing heritage assets and addressing the economic uncertainty that has blighted the area. (rather than the un-proactive phrasing in respect of simply “addressing a statutory presumption in favour of retaining heritage assets unless justifiable”). A number of heritage assets, including the conservation area itself are at risk. As such there should be a presumption for restoring and bringing these heritage assets into viable use.

Page 81 Bruce Grove, Para 5.23. We would welcome inclusion of an objective to address the “at risk” status of a number of designated heritage assets within the neighbourhood, including the conservation area itself. Much has been achieved in respect of conservation-led regeneration but the area would benefit from an identification of target objectives to resolve the issues which undermine the wider positive work undertaken. We note that the site allocations do seek to address some of these issues – particularly through requirements for BG1 & BG2).

Page 85 BG2. No 5 Bruce Grove is also a Grade II building (as one of a pair of early C19th semi-detached properties with No.6) and as such this should be identified in the description. We would recommend that the Council should expect new development to respond positively to its historic character and preserve *and* enhance (rather than “or”) the significance of heritage assets in this location. The general condition of the built environment and opportunities to address poor condition, setting, and secure viable future uses are widespread.

Page 88 BG3. We would recommend inclusion of a requirement to preserve and to seek opportunities to enhance the setting and character of heritage assets. We would suggest a commitment to high quality natural materials for public realm works and



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reviewing positive examples of schemes such as the new Overground Stations at Haggerston and Hoxton.

Page 90. BG4. Having reviewed our records it is unclear which designated heritage assets/listed structures are directly adjacent to this site allocation. It would therefore be helpful to clarify this.

Page 93 Tottenham Hale. The area is likely to experience the greatest transformation in respect of new development as set out in the objectives. If Masterplans are to deliver the quality of development sought the council needs to develop mechanisms for securing a high quality of design within a challenging fragmented area. As such we would welcome the inclusion of requirements which help drive a higher quality of development than previously experienced, avoiding blocking views and access to the Lee Valley and improves pedestrian and cycle access, whilst mitigating the impact of the gyratory system.

Whilst comparatively low in designated heritage assets (with the exception of 62 Monument Way, a grade II building at risk) the Urban Characterization Study has identified significant local heritage assets which should be integrated into aspirations for the area. Heritage assets can be preserved and enhanced to provide a much needed sense of place within what was once an important historic neighbourhood. Identified heritage assets include high quality industrial buildings (particularly within TH3) and surviving pre-post war residential streets.

It would be helpful to identify archaeological priority areas within site allocations as these will impact on the planning requirements for potential developers.

Page 101 TH3. Ashley Road contains a number of fine undesigned industrial heritage assets. We would suggest that the council consider including requirements which seek to integrate these buildings within new development. Such buildings can provide useful and attractive opportunities for creative industries (as acknowledged in the GLA's draft City Fringe OAPF). They can also help define local character and act as an inspiration for high quality contextual design.

Page 111 TH7. New development should preserve and/or enhance the setting of the adjacent grade II listed Ferry Boat Inn.

Appendix B Page 127. Although in need of updating the Council possesses adopted conservation area appraisals for all conservation areas and as such we would recommend reference to these.

Page 128. In English Heritage's view a number of the Strategy documents (where we have been consulted) do not present a positive strategy for the historic environment. The AAP therefore presents an opportunity to ensure that the Council's strategic vision addresses all aspects of sustainability as set out in the NPPF.

We also note inclusion of the Transforming Tottenham Hale Urban Centre SPD. This is now in need of updating as infrastructure programmes such as Crossrail have developed and are likely to influence opportunities significantly.



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