

Local Plan Consultation
Planning Policy
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10th January 2017

Dear Sir/Madam,

**Schedule of Main Modifications to
Alterations to the Strategic Policies, Development Management DPD, Site Allocations
DPD and Tottenham Area Action Plan – November 2016**

Thank you for consulting Historic England on the schedule of main modifications to 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. On viewing the main modifications following the recently held Examination in Public, we have the following comments to make:

Alterations to the Strategic Policies

In general we have no further comments to make, except the following:

ALtsMod17

We would suggest that the proposed text be amended so not placing an obligation on Historic England to assist, as the local authority should utilise its own heritage specialists first and seek advice as and when necessary from Historic England.



The consideration of potential redevelopment options, for individual renewal estates, should have regard to the potential heritage interest of the estate (Historic England can assist with identify this) and to existing social and community facilities that support the existing community.

Development Management DPD

We support the proposed changes and have no further comments to make.

Site Allocations DPD

We support the proposed changes and have no further comments to make.

Tottenham Area Action Plan

In general we have no further comments to make except in relation to the proposed changes to policy AAP5 Conservation and Heritage (AAPMod20 to AAPMod25).

First concerns the introduction of a new Part A, which appears to be in addition to the existing Part A (as presented in the pre-submission version). The wording appears not to flow and appears to partially duplicate Part A b of the existing draft policy, in terms of its relationship to regeneration and local communities/neighbourhoods. To help address this potential overlap we would suggest the following amendments. In addition the inclusion of Conservation Area Appraisals as part of the new combined Part A includes the opportunity to review boundaries. Whilst amendments to Part A a are to provide clarity on the range of appraisals and management plans to consider:

A. The Council will seek to deliver growth and regeneration in Tottenham through well-managed and balanced change, ~~This means balancing continuity and the preservation conservation of local distinctiveness and character~~ whilst ensuring historic environments continues to contribute to the remain functional places and spaces that respond to the needs and identity of local communities.

A-The To achieve this aim the Council will seek to strengthen the historic and local character and local identity of Tottenham by conserving sustaining and enhancing heritage assets, their setting and the wider historic environment. This includes reviewing Conservation Area Appraisals and Management Plans where appropriate, ~~including reviewing existing boundaries~~. Proposals for new development will be required to:

a Reflect, where available and relevant character and heritage appraisals, statements and management plans for the area and/or heritage asset area;

b Identify and positively respond to the distinctive character and significance of heritage assets and their settings, whilst balancing the need to sensitively facilitate neighbourhood regeneration and renewal;

c Maximise opportunities for integrating heritage assets within new development and enhance connectivity between them;



d Put heritage assets to viable uses consistent with their conservation, including through the adaptive re-use of vacant historic buildings, reinstating street frontages and historic street patterns, wherever possible; and

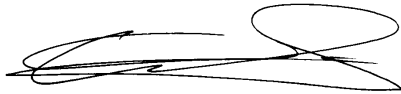
e ~~Reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries.~~

The second concern relates to the deletion of Parts B, C and D of the pre-submission version of AAP5. These sections sought to provide clarity on the tests of harm and justification to support such harm. These are key points to consider at the local level and in the context of substantial change proposed in Haringey their deletion raises concerns of how issues of harm will be treated in line with national policy. At present the supporting text (para 4.23) provide a broad test, but not sufficient in detail to reflect the nuances of the tests clearly set out in national policy (NPPF para 133-135).

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.

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,



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