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29 March 2017

Dear Planning Policy Team

Wood Green Area Action Plan Preferred Option Report (Regulation 18) Consultation

Thank you for the opportunity to comment on the Wood Green Area Action Plan Preferred Option Consultation Report.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process. Accordingly Historic England welcomes the opportunity to comment on the Report.

We have reviewed the document against the *National Planning Policy Framework* (NPPF) and its core planning principle 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. The historic environment is a relevant matter contributing to sustainable development, as identified in paragraph 7 of the NPPF. National policy requires local plans to set out an active, positive approach to the historic environment (paras 126 and 157). The following comments are made in the context of the principles contained in the NPPF and the accompanying Planning Practice Guide (PPG).

Summary of main considerations

Historic England responded to the Issues and Options Reg 18 Report on 17 March 2016. In our letter we recognised the desirability of developing an Area Action Plan (AAP) to provide a coordinated framework for sustainable growth and considered the character assessments, identification of heritage assets, and issues faced to be accurate. However, we made a number of recommendations to strengthen the AAP as a positive strategy for the conservation and enjoyment of the historic environment (NPPF Policy 126).

Overall the proposed Preferred Option AAP is well detailed and comprehensive. We are pleased to note the *Portrait of the Area*; the inclusion of policies WG5 :Urban Design Framework; and WG7: Heritage; and that the contribution made by the heritage assets to

local character and a presumption for refurbishment and re-use is a theme that runs through the main document.

We also welcome the requirement for master-planning sensitive sites . We consider the Site Allocation descriptions to be well detailed and their co-location within the proposed AAP (which identifies heritage assets etc.) to be helpful. This largely addresses the concern that heritage assets should identified within the Site Allocations (Katherine Fletchers Letter of 7 March 2014 in respect of Site Allocations).

We do consider however that there are a number of issues which would benefit from further consideration. These are set out below with further observations set out in the general comments which follow.

The proposed SPD identifies numerous locations for tall/taller buildings and landmark buildings. The document proposes that tall buildings are to be delivered in accordance with the emerging "Tall Buildings SPD". Tall/Taller Buildings can have wide reaching impacts and there is a need for these to be assessed accumulatively, and in relation to the significance of heritage assets. Therefore we remain concerned that the proposed AAP does not provide sufficient mitigation for harmful impacts. This is potentially exacerbated as it does not appear to identify maximum heights or clear parameters, it is therefore unclear how the emerging "Tall Buildings SPD" will address this issue and we would welcome clarification in this respect.

Site allocation WG SA1 LBH Civic Centre is potentially non-compliant with the NPPF and needs to better reflect the requirement for heritage assets to be conserved in accordance with their significance (this is explained more fully in my general comments below).

General Comments

Tall buildings

In our previous letters, in respect of the Alterations to Strategic Policies we suggested that the Council review Historic England's Good Practice Advice Note (GPA3) on the Setting of Heritage Assets (March 2015) to inform the options and the location of tall buildings, and new development. The reason for this was the "Potential Tall Buildings Locations Validations Study" which seeks to justify tall buildings in various locations did not consider robustly the significance of heritage assets. This study raises the issue of sensitivity to negative impacts but does not provide detailed analysis. We must therefore reiterate that it will be important to ensure that the significance of heritage assets and their settings is considered within the SEA of the Sustainability Appraisal.

Archaeology

Part of the Plan area is designated as the Wood Green Village Archaeological Priority Area and this should be considered in developing the guidance. The historic summary (3.1) starts in the middle ages with the first records of Wood Green. It does not seem to have examined archaeological information as part of its baseline data collection.

Predating the middle ages are a number of palaeolithic tool finds located to Wood Green, and the area's situation on the banks of the Moselle Brook adds to its potential for early prehistoric archaeology. Environmental evidence from channels of the Moselle has potential to tell us a great deal about former land use and the patterns of human

occupation. Development may affect deposits containing this evidence. It would therefore be helpful to identify this potential.

Section 3.15 could usefully detail some of the undesignated heritage assets in Wood Green. These include the sites of medieval buildings where archaeological remains can be expected such as the Westbeech Road moated site and along Lordship Lane and Station Road.

Remains of industrial archaeological and heritage significance connected with nineteenth century transport and energy infrastructure may also be present.

Redevelopment of many of the strategic allocation sites has potential to affect the remains summarised above. Policy WG7 could be usefully revised to reflect the above and we would recommend an additional NPPF compliant sentence in paragraph 1 along the lines of:

“The preservation and improved public understanding of significant archaeological remains affected by development will be required”.

Comments on text.

WG5 page 31. 1 & B iv We would suggest a minor amendment to read “positive characteristics” and “establish podiums which respect and reflect the positive aspects of the character area”. Reason: neighbouring sites may not contribute positively to character.

WG5 .4 It may be helpful to promote future development to look for opportunities to reinstate streets where these have been severed by large impermeable developments

7.48 page 87. We welcome the inclusion of Policy WG5 but consider that it would be beneficial to expand the explanation of the term “Landmark”. Where a strong historic context exist proposals for new buildings these will need to demonstrate how they strengthen local character and enhance the setting of heritage assets. This could be better resolved by making clear that new “landmarks” should demonstrate understanding and an exceptional response to their local and historic context . The Council may therefore wish to consider the use of design codes for character areas in order to promote high quality design. This might better ensure that sites which reflect the character of the High Rd or Heartlands share characteristics which reflect these areas.

WG6 – see main considerations

Site Allocations

WG SA1 page 107. LBH Civic Centre. The Site Commentary should reflect the NPPF. The Civic Centre is identified as a locally listed building and as making a positive contribution to the character of the conservation area. The statement that any comprehensive redevelopment requiring demolition would need to justify that the replacement building would make a significant contribution to the Trinity Gardens CA is potentially non-compliant as it does not reflect the requirement to conserve heritage assets in accordance with their significance and the need for harm to be justified against the policies set out in the NPPF(133, 134). We would recommended that this section is reworded to state that demolition can only be considered if the wider public benefits demonstrably outweigh the significance of the heritage asset and is subject to the tests set out in the NPPF.

WG SA 14 & 15 The potential inclusion of Landmark/Tall buildings on both these sites with no apparent height parameters and close proximity to designated heritage assets will create a challenging design environment. We would urge the Council to more clearly define an appropriate scale for development.

WG SA20 Wood Green Cultural Quarter

The site allocation includes the handsome Cambridge House , 189 Mays Rd, which is identified as a locally listed building in Figure 3.7. It would therefore be helpful to indicate that only the Job Centre and Guillemot Place are identified for potential redevelopment – not Cambridge House (which we assume to be the case).

Conclusion

We must stress that we recognise the potential benefits of the proposed document and are keen to work with the Council and other strategic partners in the development of this document. Therefore, please do not hesitate to contact me if you have any questions regarding these comments.

Finally I must note that this opinion is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the AAP, have adverse effects on the environment.

Yours sincerely

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