

APPENDIX 3 CONSERVATION OFFICER'S RESPONSE

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| 5 | <i>"The characteristic features, sensitivities and opportunities offered by the Conservation Area as well as the need to preserve its primacy and consistent legibility along the High Road have been <u>amply discussed at pre-application stage...</u>"</i> | This point is relevant to the viewpoints that were selected – none of the more exposed views from Tottenham Cemetery |
| 5 | <i>"While maximizing the opportunities for creating new access into the site through the Conservation Area frontage along White Hart Lane which will benefit from <u>high quality</u> new development to complement the surviving listed and locally listed buildings there located. At the outset, <u>the illustrative site plans</u> present to many extents a contextually coherent development proposal which is broadly supported from the conservation standpoint."</i> | Neither the quality of the development can be commented on, and nor do the illustrative plans ultimately form the basis for robust decision making, given their conflicts with the parameter plans, specifically in relation to the heritage assets. The assessment here is clearly on the basis of the illustrative scheme. |
| 5 | <i>"The proposed gradual increase in built scale and height from east to west is welcome and supported from conservation grounds as this strategic mass and height allocation is successfully designed to mitigate the potentially overwhelming jump in scale between the two-three storey Conservation Area and the new development with its large buildings and tall towers peripherally located by the western boundary of the development site."</i> | But the response ignores the "overwhelming jump in scale between the two-three storey Conservation Area" buildings on White Hart Lane and the towers of the proposal to the south of WHL. If this "overwhelming jump in scale" is harmful and important to avoid, then the Officer ignores that altogether. |
| 6 | <i>"The submitted townscape views further help to understand the specific proportional and <u>architectural relationship between each proposed blocks and neighbouring heritage buildings and related Conservation Area.</u>"</i> | The townscape views show maximum parameters and illustrative breakdowns. It is not possible to understand any architectural relationships from the max parameter plans. |
| 6 | <i>"Focusing on the immediate relationship between proposed new development Plots and surviving heritage assets, the proposed illustrative and maximum parameters outline the range of possible impacts of the proposed development on several heritage assets and ultimately provide <u>a useful indication of the most heritage-sensitive massing and height</u></i> | What is the basis for the assessment, the illustrative breakdowns or the maximum parameters. There is no such a thing as "illustrative parameters". |

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| | <i><u>options which are often achieved with the illustrative parameters in such a heritage-sensitive context."</u></i> | |
| 6 | <i>"It is <u>unclear at this outline planning stage</u> how the proposed Plots H and I immediately surrounding the listed building at the back and to the eastern flank off the grade I listed building will related to one another and to The Grange in architectural, landscape and spatial terms and it <u>is also unclear at this stage what type of improvements or alterations, if any, will benefit The Grange.</u> ... while these illustrative new Plots may constitute the maximum acceptable built quantum in such sensitive setting, <u>the implementation of the proposed maximum parameters would very likely raise concerns about the overwhelming impact that a coalescing group of bulkier, taller and more imposing new buildings would have on The Grange and on this stretch of the Conservation Area.</u>"</i> | <p>We have from this, in relation to The Grange and the CA:</p> <ol style="list-style-type: none"> 1. Lack of clarity about impacts. 2. Lack of clarity about the type of improvements – and indeed whether there would be any improvements. 3. Identification of an "overwhelming impact". <p>There is no conclusion here about benefits to The Grange, only harm.</p> |
| 6 | <i>"While the site layout and the potential landscape and architectural aspects of the development proposal surrounding The Grange is positive and welcome in principle, the national importance of the listed building would require a higher level of definition of the proposed developments at Plots H and I directly impacting on its immediate surrounding to achieve the most appropriate development response which can be certainly guided by this masterplan scheme, but is fundamentally deferred to a future detailed application where the optimal design response to The Grange and to this stretch of the Conservation Area will be sought."</i> | <p>Here we have as positive the</p> <ol style="list-style-type: none"> 1. site layout and 2. the potential landscape and architectural aspects <p>The rest is indeterminate at this stage.</p> |
| 6 & 7 | <i>At No 7 White Hart Lane "the potential for a maximum scale, massing and height of development which risk to overwhelm the small scale, two storey height of the listed house, whose street presence and townscape legibility are already impaired by the recessed building line. The listed building will be flanked by a new building that depending on the plan form,</i> | A harmful impact anticipated in relation to the maximum parameters. |

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| | <p><i>mass and height configuration could constitute a relatively gentle, heritage-sensitive and acceptable transition in scale as per illustrative parameters, but greater heights and masses may prove harmful and will have to be carefully considered and assessed at detailed application stage ... The national importance of this listed building requires a much greater level of design definition of the proposed development to fully appreciate its relationship with the heritage asset, but this outline proposal seems already to confirm that building according to the proposed maximum parameters for Plot G is potentially harmful to the character and significance of the listed house and its Conservation Area."</i></p> | |
| 7 | <p><i>"The Code and suggested architectural approach are inconsistent with the current maximum parameters and risk to be ineffective as no architectural treatment and finishes can successfully mitigate the impact of excessively tall new blocks in the immediate vicinity of heritage assets."</i></p> | <p>Identification of harm in relation to the parameters, which is what the Council needs to assess, and conflict between the Design Code and the parameter plans.</p> |
| 8 | <p><i>"the proposed replacement of the locally listed and neighbouring Victorian terraces comprised between Moselle Place and Brereton Road with Plots E and C should still be considered as an opportunity to reconnect the broken historic frontage of the Conservation Area and to raise the quality of its setting through high quality, context sensitive new development and a higher degree of definition of the proposed Plot E is necessary to ensure its proportions and design quality outweigh the loss of the local heritage terrace part of the original street frontage"</i></p> | <p>Harm due to the loss of the locally listed buildings. Not enough definition of Block E to outweigh that harm at this stage.</p> |
| 8 | <p><i>"Looking at the proposed development scheme in its complexity and richness"</i></p> | <p>There is no basis on which to make an assessment of "richness". Only the maximum parameters.</p> |
| 8 | <p><i>"elements of various heights which will intrude to various degree in the background of established views from and towards Conservation Areas and heritage assets, the potential new development configured"</i></p> | <p>The parameters, which the Council is assessing here, would "appear in most instances as coalescing and <u>overwhelming</u> for the historic built environment in several views into and across the impacted"</p> |

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| | <p><i>according to the proposed maximum parameters would instead appear in most instances as coalescing and overwhelming for the historic built environment in several views into and across the impacted Conservation Areas. This seems one more reason to carefully refine the parameter plans and Design Codes for the proposed development refining the design guidance in relation to heritage assets"</i></p> | <p>Conservation Areas". This cannot be construed as anything other than harmful.</p> |
| 8 | <p><i>"26 accurate visual representations whose viewpoints have been agreed during the preapplication process"</i></p> | <p>Why then, for a smaller scheme on a significantly smaller site, were 29 views required for the Goods Yard + Depot Scheme? This is an inconsistent approach.</p> |
| 9 | <p><i>"The following views show the overwhelming effect of the proposed development on the character and experience of the Conservation Areas and heritage buildings ..."</i></p> | <p>Wholly inconsistent approach. No discussion of the Bruce Castle or Tottenham Cemetery CAs. Extracts below from the response to the Goods Yard + Depot Scheme, none of which made it into the response to the LL scheme:</p> <p><i>"Bruce Castle and All Hallows Conservation Area has considerable historic and architectural significance and includes three important historic buildings – Bruce Castel (Listed Grade I), All Hallows Church (Listed Grade II*) and The Priory (Listed Grade II*). The applicant's assessment suggests that the existing Rivers Apartments tower located to the north-west of the development site and outside the Conservation Area, is already seen from the park and that the proposed scheme would not bring about a particularly noticeable change to the perception of the urban setting of the park. This position ignores that the proposed towers, especially the Goods Yard towers would very uncharacteristically stand out and be prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. It is our opinion that the proposed development would dominate the surrounding of the Conservation Area and would negatively impact on its experience.</i></p> <p><i>Tottenham Cemetery Conservation Area is similarly impacted by the tallest elements of the new development since the proposed towers, especially those standing n the Goods yard site, would</i></p> |

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| | | <p><i>uncharacteristically dominate in the views across the Conservation Area, especially those views taken from the northern section of the Tottenham Cemetery which is characterised by open spaces, landscaping in the park and small-scale development in long views. It's therefore felt that the proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.</i></p> <p>...</p> <p><i>As part of the current development proposal both council officers and applicants have visited and analysed in depth the characteristic features and experiential quality of these Conservation Areas and have been able to appreciate how especially the Bruce Castle Park and the northern section the Tottenham Cemetery are large, landscaped areas with a high level of public fruition and with a good degree of visual connection with the surrounding mainly low rise, traditional built environment that significantly constitutes the visual background of views across the Conservation Areas and therefore significantly contributes to the peaceful, open and landscaped character of the Conservation Areas.</i></p> <p><i>Current view 16 clearly shows the imposing of the proposed towers in views across the Bruce Castle Conservation Area where the trees and nature in general is the domineering, tallest element that blends in with the sky above. Existing buildings appear in the view as subordinate to the landscape, are not imposing architectural gestures such as the tall towers, and in the light of these considerations it is very difficult to accept the position of the applicant's heritage statement that this view across the Conservation Area are not significant just because these are not marked up in the adopted Conservation Area Appraisal, as this would totally ignore that the whole experience of the Conservation Area is a dynamic one and depends on what we see and perceive when we move throughout the area, and view 16 is taken from a junction of paths which lead from the park playground to the northern access to the park, so it's not a secondary or negligible viewpoint in the experience of the park and Conservation Area.</i></p> |

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| | | <p><i>Submitted views 18, 19, 20 respectively show how the new development will be uncharacteristically and prominently visible across the northern section of the Tottenham Cemetery, a place of prayer and peace, but also a public space for families and children where the current views are those of the graveyards, rich vegetation, trees and the sky. It is again difficult to accept the applicant's position that the development retains the character and appearance of the Conservation Area and has no or minor effect as suggested in the submitted reports."</i></p> <p>None of this was noted in relation to the LL scheme. The Conservation Officer's response does not even mention Tottenham Cemetery CA, aside from noting how the ES assessed it. It simply cannot be said that the two applications have been treated in a consistent way, especially when considering the fact that no open views from Tottenham Cemetery were required of LL, and the views of the LL scheme from Bruce Castle are significantly more impactful for the LL scheme (as would be Tottenham Cemetery).</p> |
| 9 | Omission of Grade II* Dial House | <p>No impact identified arising from LL, even though this scheme would demolish part of the <i>"well-preserved urban scale and architectural quality of its immediately surrounding stretch of High Road"</i> (see below). No views were produced to show the impact of the scheme from the south of this listed building. In relation to the Goods Yard + Depot Scheme, this is how the Officer commented:</p> <p><i>"Grade II* Dial House, located at 790 High Road is the bookend house to the highly significant Northumberland Terrace, as a prominent and valuable corner building in the Conservation Area <u>it benefits even more than others from the well-preserved urban scale and architectural quality of its immediately surrounding stretch of High Road</u> and the proposed Goods Yard towers would definitely dominate in those views of the historic frontage of North Tottenham Conservation Area taken from Dial House, submitted northwards looking views of the High Road show how the proposed towers, especially those on the Goods yard site, would <u>partially obscure the legibility and primacy of the continuous historic roofscape along the west side of the High Road</u> [the LL scheme would physically destroy some of this] and would loom above the</i></p> |

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| | | <p><i>historic buildings views from Dial House, thus adversely affecting the contributing setting of this important building."</i></p> <p>This shows a wholly inconsistent approach to assessment and harm, which is incompatible with an even-handed approach.</p> |
| 9 | <p>Conclusions <i>"This development will significantly change and improve the urban environment of North Tottenham but will also change the immediate surrounding where we experience heritage assets and their views. <u>Even in their illustrative, most heritage-sympathetic configuration</u> the tallest elements of the new development dominate to various degrees in the background of currently undeveloped, or modestly developed, uncluttered open views towards the development site as experienced from various standpoints including Bruce Castle Park, from White Hart Lane, from Northumberland Park and along the High Road. This would lead to a level of harm at the mid-range of 'less than substantial' affecting several designated and undesignated heritage assets and the tests set at paragraphs 196 and 203 of the NPPF will apply."</i></p> | <p>The overall conclusion of <i>"the mid-range of 'less than substantial'"</i> harm is clearly based on the <i>"illustrative, most heritage-sympathetic configuration"</i>. It is clear that no overall conclusion has been made in respect of the maximum authorised parameters.</p> |