

CONSERVATION COMMENTS

Application Ref: HGY/2015/3000

Location: Tottenham Hotspur Football Club 748 High Road, Tottenham

Proposal: Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001). The proposal is EIA development. THIS IS A RECONSULTATION FOLLOWING THE SUBMISSION OF ADDITIONAL ENVIRONMENTAL INFORMATION.

Officer: Neil McClellan

Background:

Tottenham Hotspur Football ground partly falls within the North Tottenham Conservation Area and the Tottenham Historic Corridor. This section of the High Road is characterised by predominantly three-storey brick-built Victorian and Edwardian buildings that front directly onto the High Road.

The site also falls within the wider regeneration sites of Tottenham in the Tottenham Area Action Plan. The main areas of focus that could be influenced by the Stadium development are High Road West and Northumberland Park. No doubt, the stadium development could be a catalyst in the future regeneration of the area.

The applicants have received planning permission for a new stadium and associated works along with residential development, hotel, museum and associated public realm works as per HGY/2010/1000. Demolition of several buildings, including Fletcher House (listed at grade II) was given approval at this time in order to facilitate the stadium development. This also included a locally listed terrace- 766-754 High Road. A section 106 agreement was agreed to retain the locally and

listed buildings at the southern end- Nos 750, 748, 746 and 744 to be restored and refurbished for reuse.

This scheme has been partly implemented in that the ground works for the stadium and the demolition of the listed and locally listed buildings has been undertaken. The proposed Lilywhite Lounge has been completed along with raised ramp to access the building along Paxton Road and the new Sainsbury's super market fronting Northumberland Park.

The new scheme proposes to demolish further three locally listed buildings (out of the four agreed as part of the Section 106 to be retained), enclose the remaining listed building within a modern metal clad terrace, a new stadium of a different design, a hotel and associated public realm. It further seeks outline planning permission for an 'Extreme Sport' building and four residential towers.

Heritage Assessment:

In essence, the main heritage assets to consider are:

- Tottenham Historic Corridor
- North Tottenham Conservation Area, including the other listed and locally listed building beyond the immediate vicinity of the site
- No 744, Warmington House (listed grade II)
- Nos 746-750, locally listed, proposed to be demolished
- Nos 790-814 High Road on the north side, most of which are listed at grade II and II* (the northern terrace);
- No 707, High Road (listed grade II)
- No 705, High Road (locally listed)
- St Francis De Sales RC Junior School and Presbytery (Locally Listed)
- Nos 743-759 on the south side, locally listed
- Nos 793-829 on the south side, listed (grade II) and locally listed
- 2-4 Park Lane (Locally Listed)
- Bruce Castle Conservation Area
- Alexandra Palace and Park Conservation Area and Registered Historic Park
- Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield

The North Tottenham Conservation Area was originally designated in 1972, and is one of a sequence of six conservation areas, which form the Tottenham High Road Historic Corridor. The area runs from the northern boundary of the borough to south of the junction with Lordship Land / Lansdowne Road.

One of the most significant aspects of the conservation area is that it is part of a long established route. Tottenham High Road is now, and has been for many centuries, a main route into London from the north. The Roman road, known as Ermine Street followed parts of the High Road. In the Middle Ages, settlement was strung out along the road. During the 18th century, fashionable houses

were built along the High Road, and later, as mass transport developed in the form of railways and trams, the High Road became infilled with houses, shops, and grand civic and commercial buildings.

The junction at Northumberland Park and White Hart Lane forms a historic village core with an intense and highly significant cluster of Statutorily Listed buildings (mainly grouped on the east side of the High Road), and Locally Listed buildings. Paragraph 4.28 of the Tottenham Historic Corridor Appraisal (adopted 2009) states- 'This section of the eastern side of the High Road is fronted by some of the best preserved groups of the substantial Georgian properties that characterise much of the area'. Unfortunately, many of these buildings have been vacant and neglected for over 15 years and are included in Historic England's 'Heritage and risk' register.

The 18th Century Georgian town houses on the eastern side of the High Road adjacent to the stadium are vital and distinctive elements of this part of Tottenham. There is a distinctive and idiosyncratic quality to this part of the conservation area, resulting from the 'interweaving' of several phases of developments of North Tottenham: the high quality Georgian buildings juxtaposed with the later mainly two to three storey Victorian and Edwardian buildings along with the Tottenham Hotspur Stadium and the latest Lilywhite Lounge rising above the Georgian terraces, as viewed from White Hart Lane. The High Road, however, appears distinctive with the general homogeneity in scale and massing of the various buildings, built up to the pavement.

The Tottenham Hotspur Football Club has great cultural significance not only within the local area but beyond London. On match days, the area transforms with football fans flocking into the stadium, with many businesses thriving on match day economy. The club's association with Tottenham High Road is over 130 years old. The club derives its name from the wife of the owner of Percy House, 796 High Road, who was the grand-daughter of the Earl of Northumberland and descendant of Hugh 'Hotspur' Percy (1364-1403) after whom Tottenham Hotspurs Football Club was named¹.

Notwithstanding the above, the current stadium's architectural contribution to the setting of the conservation area is negative and even though set back, its relationship with the High Road is poor. This section of the High Road originally contained a row of unlisted, locally listed buildings and one listed building behind which the Stadium almost existed unobtrusively. As already stated above, this group of buildings has been demolished as part of the part implementation of the previously granted scheme. Paragraph 4.36 of the adopted appraisal described these buildings as:

'The section of the High Road between Paxton Road and Bill Nicholson Way is primarily lined with three storey Victorian buildings that front directly onto the road. They have shops at ground floor level, with two floors of residential accommodation above. Nos. 754 to 766 (even) are local listed buildings, typical of the narrow fronted Victorian shop houses of approximately 6m wide, that are common along the High Road. Together with Nos. 752A to C this terrace is constructed of yellow London stock brick, Nos. 752A to C with red brick dressings. Unfortunately, Nos. 764 & 766, now have rendered facades, 'boarded up' windows and their poor condition diminishes their contribution to the streetscene'.

¹ Newell, C. 2015. *Heritage Statement for Percy House, 796 High Road, Tottenham*. [Online]. London. Corrie Newell Historic Buildings Consultancy. [October 2015]. Available from: <http://www.planningservices.haringey.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=282128>

The demolition has caused the uninspiring frontage of the existing stadium to be exposed detracting from the conservation area. The demolition has also resulted in a break in the High Road, thus causing harm to the significance of the conservation area and its setting.

A further three locally listed buildings are being proposed to be demolished. These are described in the appraisal as:

- a) **No. 750, the former White Hart public house** is a three storey local listed Victorian building that constructed of red brick, with stone mullioned casement windows and decorated moulded double gables on both street elevations. Its ground floor pilasters and cladding is in granite and it has a splayed corner with a distinctive arched entrance. Although the building has been detrimentally altered through the introduction of unsympathetic fascia signage, it is of architectural interest.
- b) **No. 748, The Red House**, is a grand three storey locally listed late Victorian building, which is constructed of red brick with a steeply pitched double gable ends to the High Road, slate roofs and tall red brick chimney stacks. The first and second floors are delineated by stucco stringcourses, and both the High Road and Bill Nicholson Way elevations have a first floor central white painted canted oriel window with a decorated parapet.
- c) **No. 746 (former Tottenham Dispensary)** is an attractive symmetrical three storey red brick Edwardian local listed building with a Portland stone ground floor façade and an arched central entrance flanked by stone columns with a semi-circular fanlight over the door. The stone entablature fascia is inscribed 'TOTTENHAM AND EDMONTON DISPENSARY'. It has a prominent projecting stone parapet cornice with dentils and panelled blocking course, and tall brick chimney stacks at each end.

No 744, Warmington House, is a Grade II listed early C19 three storey building set back from the High Road. The south flank elevation has a Diocletian window at attic level. Adjoining Warmington House to the south, were nos. 740 & 742 which were locally listed Victorian buildings that have been demolished as part of the part implementation of the previous consent.

In my view, whilst the demolition the buildings as part of the implemented works cause loss of significance to the linearity of the High Road, the three locally listed buildings along with Warmington House form an important group that to some extent reinforce the scale and building line of High Road at this end of the stadium. Additionally, whilst in a run-down neglected condition, the locally listed buildings are an attractive group with significant architectural detailing that contributes positively to the conservation area as well as the setting of the listed building.

The applicant as part of the application has submitted a detailed Heritage statement which includes an analysis of the historical development of the site, the wider area and an assessment of the buildings within the site proposed to be demolished and the listed building proposed to be retained. It further provides a Heritage Impact Assessment of the demolition of the three buildings and the impact of the proposal on the conservation area, the designated and non-designated heritage assets within it, and their setting.

I have reviewed applicant's heritage assessment and have given regard to the Council's adopted Tottenham Historic Corridor Conservation Area Appraisal (2009), to provide my views on the proposed development as discussed below.

Impact of demolition

The applicant's Heritage Statement is well detailed and researched which I acknowledge. I agree with its assessment in paragraph 1.2.2 that 'The recent consented demolition.....detracts from the conservation area and the setting of the listed buildings in the conservation area.' However, it fails to acknowledge that the demolition was part of the previous consent and should be assessed cumulatively with the additional demolitions proposed.

In my opinion, the cumulative impact of the already demolished buildings in addition to the further demolition proposed would invariably have an impact on the conservation area and the continuity of the High Road as is evident already. This cannot, therefore, be ignored in the overall heritage impact assessment of demolition.

As discussed earlier, the previous demolition has left this section of the High Road 'blank' and I see the current proposal as the continuation of the previous, causing further harm to the continuity of the conservation area and the historic corridor. At the time of the previous application, in order to facilitate the stadium development (prior to Barnwell Manor case law and the NPPF) demolition was agreed despite the substantial harm with the agreement to protect and preserve the three locally listed buildings (Nos 750, 748 and 746) and the listed building (Warmington House, No 744) at the southern end of the development. This was following several efforts and negotiations from Historic England, SAVE Britain's Heritage and Victorian Society along with Haringey's own Conservation Officer. On balance, the podium level interaction along the High Road and the retention of the remaining four buildings was seen to provide some continuity to the High Road.

The new scheme proposes further demolition of three locally listed buildings, leaving only the listed Warmington House on this stretch of the High Road. In my opinion, the proposed demolition, cumulative with the consented demolition would cause substantial and irreparable harm to the continuity of the historic corridor, the conservation area, the listed and locally listed buildings within it and their setting.

I now come to the impact of the loss of the individual buildings and their assessment and justification as provided by the applicant. The applicant has summarised the significance of these buildings in paragraphs 1.3.8 to 1.3.27 and discussed these in greater detail in section 2.3. The assessment in some ways is dismissive of the architectural contribution (albeit run down since no longer in use). In assessing their aesthetic and architectural significance, there appears to be the recurring theme 'loss of context due to the demolitions'. This does not just refer the demolitions that have already been undertaken in the recent past. There also appears to be an incremental loss of the setting and significance of these buildings as the stadium itself expanded. For example, in paragraph 2.3.8, the applicant describes 'the rear plot of Warmington House' was truncated during this period and has since been entirely subsumed into the football club parking area'. In paragraph 2.3.18, with regards to the Dispensary building, the applicant states 'In recent years the building has

been used by THFC but at present utilised simply for storage'. It then goes on to say its poor condition and describe the boarded windows and how the ancillary building within its setting has been since demolished and subsumed within the Club's car park.

The applicant, however, does highlight the historic and communal significance of the buildings. For example, in paragraph 1.3.15, the document (with regards to the Dispensary) states 'The historic significance of the building lies in its original use as Dispensary and its connection to an aspect of the early development of health care in England'. With regards to Red House, paragraph 1.3.20 states 'The Red House has historical significance for its origins as a coffee house and association with the late 19th Century temperance movement which sought to provide an alternative to the public house as a meeting point for the working classes'. Similarly, it also highlights the communal value of Red House 'in its later use as the office of the Tottenham Hotspur Manager Bill Nicholson' (paragraph 1.3.22).

Based on their own assessments as well as the Council's Appraisal, I consider the significance of these buildings to be high in terms of their architectural, historic and communal value. I agree that their interiors perhaps do not contribute to the conservation area, but it is evident that they have been neglected by the owners and have been left vacant for a long time. More importantly, interior alterations are expected of locally listed buildings as they are not governed by the same controls as a statutorily listed building. I would not consider that to be a reason for diminishing their local contribution to the conservation area.

I disagree with the applicant's assessment of the architectural and aesthetic significance of the building on the basis of their unkempt condition and 'loss of context'. I find this assessment flawed as it seems to have used the 'cause' of the demolition as the 'reason' for loss of significance of the buildings. It suggests that since previous demolitions have taken place, the existing buildings have lost their context, without acknowledging that the demolition was part of an agreed plan to facilitate the stadium's development with the agreement to retain these particular buildings. Additionally, the stadium's own expansion and neglect of the historic buildings it has owned has resulted in further incremental loss of 'context', significance and setting. The 'loss of context' is clearly 'caused' by the existing stadium and the proposed development and this part of the assessment is, in my opinion, flawed.

Based on their assessment, the applicant implies that the loss of the buildings would cause less than substantial harm, since they have already lost their context and that their unkempt and vacant condition has diminished their significance. As such their conclusion is, 'The proposals would require the loss of three locally listed buildings [...] would therefore result in some harm, to significance of this conservation area (paragraph 1.4.5). This conclusion is also detailed out in paragraph 4.4.10 of the Heritage Statement.

I disagree with this conclusion and attribute high significance to these buildings individually. I conclude that they contribute positively to the conservation area's architectural, historic and communal value. Their demolition would, therefore, cause substantial harm to the conservation area and its significance.

Additionally, their loss would also cause substantial harm to the setting of Warmington House, a statutorily listed building. The buildings together form a group and form part of the continuity of the High Road's bygone past and contribute to Warmington House's setting.

The impact of demolition on the setting of other listed buildings (the Northern Terrace) 707 High Road, and other locally listed buildings would be limited given their distance and proximity.

Justification of demolition

Paragraph 4.2.14 of the applicant's heritage statement states that 'The demolition of the three locally listed buildings is proposed in order to address two key issues: crowd flow safety and townscape'. Paragraphs 4.2.15 to 4.2.41 go into details of how the demolition would achieve safer pedestrian flow and that the proposed Tottenham experience building would enhance the townscape of the High Road.

In addition, the applicant has also submitted a separate optional appraisal of various solutions to overcome crowd safety issues. In paragraph 4.5.8 of this document, the applicant states that the minimum required width of the pavement to provide safe crowd flow is 6.8m. The effective width in front of 746 High Road is 3.8m; 748 High Road is 1.8m and 750 High Road is 2.2m, resulting in a pinch point of 1.8 outside No 748. It is this 'pinch point' and narrow pavement that is being used as an argument to demolish the three locally listed buildings, to effectively gain 5m excess pavement. The report has been further corroborated by an independent expert Dr Jamie Dickie in his report dated 9th October 2015.

The report further includes options such as stewarding and temporary closures and comes to the conclusion that the only way to achieve the safe footway of crowd safety would be to demolish these buildings. This argument has been used largely towards justifying the demolition of locally listed buildings. In my opinion, the proposal would cause total loss of significance of three non-designated heritage assets, and cause substantial harm to the continuity of the historic corridor, and the significance of the conservation area as well as the setting of the listed building (Warmington House).

In terms of townscape, the applicant's Heritage Statement argues that the replacement of the buildings 'would allow a more holistic approach to the design of the stadium development, transforming the way in which it will address and connect with the High Road and resulting in an overall enhancement of the character of the conservation area' (paragraph 4.2.18). It further states that 'The significance of the locally listed buildings would be partially retained by salvaging artefacts and elements of the building for relocation and/or reuse within the proposed Tottenham Experience Museum'. This includes: the shop front of the 'Tottenham and Edmonton Dispensary'; Bill Nicholson's panelled office in the Red House; and possibly elements of the façade such as the bay window (paragraph 4.2.23). It further states that the local historic significance of the buildings would be recorded in the form of virtual interactive exhibits in the proposed Museum.

I have discussed the design of the proposed buildings and their townscape contribution separately in the relevant section, under the heading 'Tottenham Experience and Warmington House'. With

regards to the townscape, I consider that the High Road is a diverse mix of Georgian, Victorian and Edwardian buildings, mainly two to three storeys in red or yellow stock brick. Whilst there are inter-war and post war buildings interspersed, the general homogeneity of scale and massing prevails throughout, providing continuity along the High Road. This in essence, is the townscape of the area. The three buildings proposed to be demolished contribute positively to this townscape.

The applicant argues that the proposed terrace would 'allow for a more holistic approach to the design of the stadium development'. I agree with this argument to a degree in that the materials and, to an extent, the scale would form a transition between the stadium and the High Road. Whilst this may have some townscape benefits, the new terrace would not relate to the existing character of the High Road and would not outweigh the substantial harm caused by the loss of the locally listed buildings and the substantial harm caused to the setting of Warmington House.

The three pieces of artefacts and façades that would be 'saved' and placed within the interiors of the Tottenham Museum would be taken out of their original context and would not overcome the total loss of their significance. Whilst there could be an argument that part of their communal significance is being retained by way of interpretation, this would not outweigh the substantial harm.

Additionally, paragraphs 4.2.19 and 4.4.19 of the Heritage Statement discusses the options of retaining the three locally listed buildings and the impact it may have on the delivery of the project. It claims that the layout of the buildings is such that they cannot be incorporated within the new terrace. It also states that the condition of the building and spaces available could not be utilised fully in the manner that the current proposal does. It states that the Tottenham Experience as well as the Skywalk would then be relocated to the rear, taking away active frontage from the High Road. I disagree with this proposition as no such alternatives have been presented that would evidence this argument. The optional appraisal only talks about the related crowd flow safety issue but does not discuss issues around the functionality (or lack of) of the locally listed buildings. I, therefore, disagree with this justification.

Overall, I conclude that the substantial harm caused due to the demolition of the three locally listed buildings on Warmington House, the conservation area, and their setting is not justified. The crowd safety argument requires demolition of three locally listed buildings and would cause substantial harm to the conservation area, the listed building and their setting. Recreating a new terrace in modern material, whilst may respond to the Stadium's design, does not relate to the wider conservation area and does not overcome the substantial harm caused by the loss of three positively contributing buildings. The heritage benefit (community significance) in retaining the three pieces of the facades and artefacts is limited and as such does not overcome the substantial harm.

Proposed development and its impact on historic environment

Having assessed the impact of the demolition, I now come to the impact of the new scheme. The following sections discuss the impact of the new development in relation to the various parts of the proposal:

Stadium

The scheme proposes a new stadium with a capacity of 61,000 (increased from 56,250 of the previously consented scheme) with a retractable football pitch to allow for NFL games, concerts and a range of other activities whilst protecting the integrity of the playing surface. It will also introduce a unique 'sky walk' visitor attraction allowing people to climb the exterior of the building up to 40 meters high. Evidently, the new stadium would be a multi-functional destination and would be used more often than the current stadium.

In terms of design, the proposed structure is well considered with a prominent street presence and entrance to address the High Road. The Design Statement in section 7.1.1 describes the design as 'a sculpted appearance- wrapping and folding its way around the stadium before reaching the home end, where a glass façade arches upwards to reveal the magnificent single tier home stand'. Indeed, along the High Road, the structure wraps around elegantly gently cascading up to the arch to reveal the glass clad single tier home stand. At the home stand, the five storey atrium space becomes an architectural focal point with the arch of the metal cladding framing the entire elevation. The eastern elevation on Worcester Avenue is addressed elegantly with a similar cascade of glass and metal cladding.

Whilst a substantial structure, the elevation treatment is such that it breaks up the overall mass of the structure with 'a palette of different surfaces and textures such as a veil of perforated metal panels, glazing, pre-cast concrete cladding and solid profiled metal cladding' (Section 7.6, Design Statement). Furthermore, the perforated metal panels act as the screen over the external plant areas that negate the need for louvers on principle elevations. Section 7.7.1 describes the external appearance and states 'This skin wraps around the whole stadium and helps to unify the external façade – creating a dynamic and flowing form that expresses the importance of both the main west entrance and, most importantly the south stand'. In my opinion, this is one of the most fascinating and interesting features of the new stadium design.

On the High Road, a diagonal glass box addresses the street frontage. The box allows views of the escalator behind taking spectators to their relevant tiers. Visually, this creates an interactive frontage that allows views into the stadium's activities on both match and non-match days. The box also creates visual transition within the scale of the stadium and the High Road.

For the reasons above, I am convinced that the new stadium is of an exceptionally high quality and the design team must be congratulated for the same. The proportions, design and appearance of the new stadium would be a landmark achievement on its own and would be an exemplar once constructed.

However, I must assess this in respect of the heritage context in which it sits. The scale, height and massing of the structure, whilst established by the previously consented scheme, remains alien to its High Road context. Arguably, it is this High Road context that makes the proposals more unique as well as challenging, being perhaps the only stadium in the middle of a historic High Road. By virtue of its scale and height, the new stadium would not preserve the setting of the High Road, the wider conservation area and other designated and non-designated assets, especially the listed buildings along the North terrace. However, this harm would be considered less than substantial as there is

already a stadium on the existing site, albeit set back from the road; and that the harm (of the stadium only) would be no greater than the consented scheme. The stadium would also have an impact on the setting of the other listed and locally listed buildings along the west of the High Road. This again, would be no greater than the consented scheme and would be less than substantial. I have given great regard to the less than substantial harm in assessing whether the new stadium enhances the significance and setting of the heritage assets.

Due to its high quality design, I consider that the new stadium would provide a greater degree of enhancement than the existing stadium or the consented scheme, providing considerable heritage benefit. I consider, therefore, that the heritage benefit to replace the negatively contributing existing stadium by a higher quality structure would overcome the less than substantial harm to the setting of the conservation area, the listed buildings (the Northern Terrace and 707 High Road) and the locally listed buildings on west side caused by its scale. However, it does not, in my opinion, outweigh the substantial harm caused by the demolitions and the break in the continuity of the High Road, as discussed before.

Tottenham experience and treatment of Warmington House

As discussed before, the scheme proposes to demolish the three locally listed buildings, retaining the grade II listed Warmington House and creating a new terrace of three storey buildings called 'The Tottenham Experience'. The terrace would incorporate the listed building, restore it and convert it as part of the Tottenham Museum.

The Heritage statement, paragraph 4.2.26, states 'The proposed Tottenham Experience building would form a vital part of this southern gateway'. The statement goes on to argue that this solution would be better than the consented scheme which gave undue prominence to the plain southern return elevation of the Warmington House. Paragraph 4.2.27 states that 'The Tottenham Experience building, together with the proposed stadium, would reinforce the High Road building line in the form of a new two storey terrace flanking the retained and fully restored grade II listed Warmington House.'

In addition, paragraph 4.2.29 explains how the terrace should be shaped and angled to give variety to the building line and roofscape currently provided by the three locally listed buildings while creating a stronger building line overall. Although, seemingly one, the elevation would be divided into two principal sections by a staircase providing access to the south podium. At the southern edge of the terrace, a sleek full height glass entrance would provide a focal point and obvious entrance to it.

This terrace would be on either side of Warmington House, visually enclosing it on three of the four elevations. With higher floor to ceiling heights this 'two storey' structure would be the same height as the listed building itself. To the rear, there would be an atrium connecting the rear of the building to the public square. The works would restore the listed building, including repair works to all the facades and careful conversion of the interiors to allow for it to be used as the Tottenham Experience Museum. It is claimed that this part of the museum would encapsulate not only the history of the football club but also reflect the history and cultural heritage of Tottenham as a place.

Paragraph 4.2.42 to 4.2.45 go on to justify that since Warmington House was always part of a terrace and having lost its 'context' with the further proposed demolition of the three locally listed building, the proposal would enhance its original setting, albeit in a contemporary manner.

I welcome the retention of the listed building as well as its restoration, and the treatment to the front façade with the steps reintroduced to provide some defensible space and would consider this as heritage benefit. I also agree that whilst rather simple, the new terrace reflects the scale and massing of the listed building and the High Road and would be of a high quality and contemporary design that responds to the character of the new stadium. However, the new terrace would 'enclose' the listed building entirely leaving it subservient to the rest of the terrace. In addition, the rear atrium would only provide glimpses of the listed building to the passing crowd without any real interaction with it. The proposal would cover it entirely on three elevations, and in my opinion, would not provide an appropriate context to the listed building causing substantial harm it. Whilst the glass insertions on either side do help to break the elevation to provide a distinction with the listed building, it does not successfully overcome the substantial harm to the listed building and its setting. The heritage benefit of restoring and converting the building may offset some of the harm, but still does not successfully overcome the substantial harm to the building's setting, to which I must give great weight and consideration.

In terms of the new terrace and its impact on the conservation area and the setting of the locally listed building immediately west and south of it, I would give some townscape merit to its design as it does respond to the High Road in terms of scale and design of the new stadium. Arguably, it provides some degree of enhancement to the setting of the High Road by providing a continuous elevation, as the locally listed buildings currently provide. However, this does not reflect the character of the High Road itself. As such, the limited level of townscape enhancement provided by the high quality design of the new terrace does not overcome the substantial harm caused by the demolition of the locally listed buildings or the impact on the conservation area or to its setting.

Public realm

The proposed public realm, beyond the Tottenham Experience, is at nearly three storeys height accessed from street level. This would leave what appears to be a wide pavement branded in the alterative grey and white stripes along the High Road itself. Whilst the public square itself may be bigger than the area of Trafalgar Square with many facilities, this does not interact or contribute to the conservation area, the listed and locally listed buildings within it, or its historic context. Most of it is along the southern edge of the Stadium, along Park Lane, again at three storeys. As such the proposed 'pavement widening' would neither preserve nor enhance the High Road and by virtue of its apparent height and finishing would cause some harm to the conservation area, its setting and the listed and locally listed buildings within it. There are no heritage benefits presented by the public realm that could outweigh the less than substantial harm, to which I must give great regard and consideration.

Hotel

The scheme further proposes a 22 storey hotel at the south western corner of the stadium. Described as 'blade shaped' in the Planning Statement (5.17) and 'Shard like' in the Design Statement, the building does provide a 'sharp' edge at the southern end of the stadium. Paragraph 4.2.46 of the applicant's Heritage Statement states that 'In views north along the High Road its narrow southern end would form an elegant marker, forming a pleasing contrast between its vertical line and the horizontal emphasis of the proposed stadium'.

Whilst I agree that the views of the sharp edge of the hotel would be elegant when viewing from the south of High Road, the structure would introduce a scale and form that is unprecedented in this part of the conservation area. As such the structure would have an impact on the setting of the conservation area and the setting of the designated and non-designated assets within it such as the locally listed buildings on Park Lane. Additionally, the wider elevation of the Hotel would, along the High Road, create a slab like structure rising behind Warmington House and the new terrace proposed. Whilst the height of the stadium is offset from the immediate vicinity of the listed building, the height and width of the Hotel would have a direct impact on the setting of the listed building and contribute to its diminishing prominence on the High Road. As such, it would not preserve or enhance the setting of the listed building and would cause substantial harm to it. Additionally, it would cause some harm to the setting of the conservation area. By virtue of its height, the hotel would also be visible from the Alexandra Palace Park and may also be visible from Bruce Castle Park and would cause some harm to their setting, but only with respect to views.

I, therefore, disagree with Paragraph 4.2.48 of the Heritage Statement which concludes that the Hotel would not have a negative impact on the significance of the listed buildings within its immediate vicinity. I further disagree with paragraph 4.2.49 states that the hotel would not harm the significance of Warmington House as its setting has been entirely lost; and that the Tottenham Experience terrace would in fact enhance its setting and visually integrate it with the larger scale Stadium and Hotel.

Whilst it may be an attractive addition from the southern end to the skyline and may provide some level of enhancement to the setting of the conservation area, it does not overcome the less than substantial harm to its setting or the substantial harm to the listed building and its setting. There are no demonstrable heritage benefits of the Hotel that could outweigh the respective degree of harm caused due to its scale and visual impact on the listed building, the conservation area and their setting.

Reserved matters: Extreme Sports Centre and residential towers

The scheme further seeks outline permission for a cluster of residential towers on the southern edge of the stadium. These would include two 16 storey, one 24 storey and one 32 storey towers sitting above the three storey podium, resulting in effectively 19, 27 and 35 storey towers. Whilst materials are subject to reserved matters, the towers are likely to be clad in masonry materials such as brick, terracotta or concrete. In terms of their design, appearance and materiality, the towers would form a coherent group.

Additionally, the scheme proposes an Extreme Sports Centre over 51 m tall (17 storeys) with a dynamic form to accommodate both outdoor and indoor facilities that would create a 'unique destination to bring sports enthusiasts and activate the precinct on non-match day' (10.1.1, Design Statement).

From a conservation point of view, the proposed towers together with the Hotel, would form a cluster of tall buildings and would introduce a scale and form unprecedented within the setting of the conservation area. Residential towers were consented as part of the previous scheme but these were up to 20 storeys with top floors receding in a manner that the tallest elements were closest to the stadium. As such the new scheme introduces a higher and, therefore, more intrusive set of towers that would neither preserve nor enhance the significance of the conservation areas, the listed and locally listed buildings or their setting, causing harm. Given the context of the stadium and the previous consent, I consider the harm to be less than substantial.

With respect to justification, there appears to be no heritage or townscape based evidence that justifies the positioning, location or the height of the proposed towers. Whilst there is merit in the design of these towers, this would not outweigh the less than substantial harm.

Additionally, whilst the visibility of the proposed cluster of towers from Bruce Castle is limited there would be an impact on the Conservation Area albeit less than substantial. This harm, however, would not be offset by any heritage benefits.

The visibility of the towers would be more extensive from Alexandra Palace Park, given the topography and the cluster would have an impact on the Alexandra Palace Park Conservation Area and the Historic Park. However, it would still be less than substantial and given their distance, context of the stadium and beyond, would be overcome by design and townscape (mainly skyline) benefits.

Outside the borough boundary, the proposed cluster of towers would also have an impact on the Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield. Whilst this should be assessed by Enfield Council separately, in my assessment I consider that given the distance and the alignment of the street, the cluster would have minimal impact on the conservation areas. If at all visible, the existing towers such as Brooke House would mitigate the potential impact of the new towers as they would form a backdrop to already existing higher blocks in the vicinity. I therefore, conclude that with regards to the two nearest conservation areas in Enfield, the impact of the towers would be negligible.

Conclusion

The stadium development is undoubtedly one of the largest development schemes on the High Road which has the potential to provide wider regeneration benefits and attract many investments and visitors to the area. In my opinion, I would describe it as 'football led' regeneration, with other leisure facilities to compliment it.

The new scheme has merits in several ways, high quality design being one of them. However, in my opinion, the scheme proposes a much greater degree of intervention than the previously consented

scheme. This includes further loss of historic buildings (in addition to the demolished buildings as part of the previous consent- part implemented) and impact on the listed, locally listed buildings and the conservation area and their setting. The introduction of the cluster of towers would also cause further harm introducing an urban form and scale unprecedented in the area. I conclude that overall, the proposal would lead to loss of significance of heritage assets and their setting, causing substantial harm to them and would not provide any heritage benefits that would outweigh this harm.

In making the above assessment, I have given great weight to the preservation or enhancement of the heritage assets as per the Council's statutory requirement. I consider the scheme unacceptable from a conservation point of view.

Nairita Chakraborty

Principal Conservation Officer

25th November 2015