

Argles James

From: Planning Support
Subject: FW: HE Response to HGY/2015/3000 and HGY/2015/3001.

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Mr Neil McClellan
London Borough of Haringey
Planning, Regeneration and Economy
Level 6 River Park House, 225 High Road
Wood Green
London
N22 8HQ

Our ref: P00479068

20 November 2015

Dear Mr McClellan

TOTTENHAM HOTSPUR FOOTBALL CLUB, 748 HIGH ROAD , LONDON, N17 0AP

Thank you for formally consulting us on the submitted proposals. Historic England considered the proposals in detail at pre-application stage, and we provided detailed comments following the presentation of the scheme by the applicants to our London Advisory Committee in June.

The submitted proposals are broadly similar to the proposals we considered and commented on at pre-application stage, so I have enclosed our pre-application advice letter from 3 July. The issues raised in that letter remain valid for the current submitted application, and therefore the advice set out here should be considered in conjunction with the 3 July letter.

However, information contained within the supporting documentation submitted with the current application confirms further areas of harm that we did not comment upon previously. You will be aware that we are of the view that the demolition of the unlisted buildings of merit in the conservation area causes substantial harm to its significance. We note that the GLA shares this assessment. The further supporting documentation submitted with the application demonstrates additional impact on the settings of the North Tottenham Conservation Area and the Bruce Castle Conservation Area, where the proposed tall hotel and residential buildings would dominate a skyline currently characterised by a traditional building scale and cause serious visual harm in a number of views from within the conservation areas.

In addition, we acknowledge that some aspects of the proposed design of the 'Tottenham Experience' range have been improved. However, our view remains that the design approach to encase the grade II listed Warmington House on three sides within a much larger modern development would cause substantial harm to the setting of that grade II listed building for the reasons we set out in detail in our letter dated 3 July, 2015.

Finally, we accept and support the obvious need for any new stadium development to conform to current crowd safety standards. However, we are not convinced that the demolition of the three unlisted buildings of merit is the only way to ensure a crowd safety compliant design. We have seen no hard evidence to demonstrate that employing stewarding and crowd management to ensure crowd flows through the 'canyon' in the consented proposals would be effective. We therefore do not believe that it has been demonstrated that the substantial harm to the conservation area caused by the demolition is necessary as required by paragraph 133 of the NPPF.

In summary, Historic England remains unconvinced that the substantial harm to the historic environment caused by the proposals has been clearly justified as required in the NPPF. In our view, the proposed scheme would not deliver additional public benefits over and above those which the consented scheme would deliver. The proposals fail to

preserve the setting of a listed building, and neither preserve nor enhance the character or appearance of the conservation area. They are therefore contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England accordingly raises strong objections to the proposals, and urges your council to refuse them. Should your council or the Mayor of London be minded to approve the applications, we will give careful consideration to whether the Secretary of State should be advised to call in the proposals for his own determination given the severity of the impact and the lack of policy support for the harm done.

Yours sincerely

Michael Dunn

Principal Inspector of Historic Buildings and Areas