

## Argles James

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**From:** Planning Support  
**Subject:** FW: LAC comments on pre-app referred to in HE response

HGY/2015/3000 & 3001

Mr Peter Riddington  
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London  
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Our ref: PA00381790

3 July 2015

Dear Mr Riddington

### **Request for Pre-application Advice**

#### **TOTTENHAM FOOTBALL CLUB STADIUM , HIGH ROAD, LONDON, N17**

Thank you for presenting the emerging proposals for the Tottenham Hotspur Football Ground to our London Advisory Committee. The Committee considered the issues in detail, and their views have informed this response. We noted in your presentation that the scheme is still under development and considerable further changes may be proposed, such as a large addition to the residential elements. You asked us to ignore those for the time being, so, to be clear, the following is only our advice in respect of the documents you provided to us prior to the meeting.

#### **Summary**

Historic England accepted the justification put forward for the consented redevelopment of the existing stadium and the consequent harm to the historic environment of North Tottenham because we acknowledge the benefits arising from retaining the football club in its historic location. We judged that this benefit, alongside others, could outweigh the harm and therefore supported the proposals consented in 2010 which delivered this aim. Revised proposals which involve additional harm to the historic environment will have to demonstrate that such harm is necessary in order to deliver further benefits that decisively outweigh that harm which are in addition to those delivered by the consented scheme.

The revised proposals involve the demolition of three locally listed buildings that make a positive contribution to the special character and appearance of the North Tottenham Conservation Area. In addition, whilst the grade II listed Warmington House is retained, development immediately adjacent and to its sides and rear will harm its setting and the contribution this makes to the significance of the building as a formerly detached villa. Separately and cumulatively these changes would, in our view, result in substantial harm both to the listed building and the conservation area. The current proposals also involve the provision of a hotel building 24 storeys high to the south of the stadium and positioned within the conservation area. The full impact of this part of the proposals has not yet been established, but from the information currently provided our view is that there is potential for further significant harm. This harm arises from the scale of the new development which both fails to respond appropriately to the existing grain and character of the conservation area and may potentially have significant impacts on the setting of other designated heritage assets.

On the basis of the information we have at present, Historic England is not persuaded that this additional and cumulative harm to the historic environment of Tottenham is necessary to achieve the public benefits currently identified. Furthermore, we are not persuaded that those benefits are of a scale that could be described to decisively outweigh this further harm. Our current view is that, given the nature and extent of the harm and the lack of convincing justification, the proposals are clearly contrary to Government objectives for the delivery of

sustainable development. Should an application be submitted in its current form we will give careful consideration to advising the Secretary of State to call-in the application for his own determination.

### **Historic England Advice**

Our statutory remit is the impact of the proposals on the historic environment. Our advice below is based on an understanding of the historic environment affected by the proposals, and an assessment within the context of national planning policy as to whether the proposals harm, retain or enhance this significance.

#### *Significance of the historic environment*

The special character of the North Tottenham Conservation Area is well understood. In summary, this character is derived from the ancient linear form of Tottenham High Road and the historic buildings that line it. The group of historic buildings at the south-west corner of the stadium site illustrate the historic development of this part of Tottenham from the late Georgian to the Edwardian periods, and are attractive and interesting historic buildings in their own right. Warmington House is grade II listed, and is a detached residential property, set back from the High Road as was typical of the period, dating from 1828. The other three buildings are locally listed from the late 19th and early 20th centuries. As a group, the buildings are significant and contribute strongly to the character of the conservation area.

#### *The proposals and their impact*

Based on the information we have seen, the current proposals are for the demolition of the existing stadium and its replacement with a larger stadium with a capacity similar to that of the consented scheme. The principal entrance to the new facility will be from the south, via a public space at podium level. The footprint of the new stadium is slightly larger than the consented scheme and more oblong in shape, which results in more of the stadium's western elevation being closer to the High Road. The previous podium concept and western drop off entrance broadly reflect the consented proposals.

Adjacent to this is a mixed use retail and museum building, which occupies the site where the three locally listed buildings are currently located. Warmington House will be retained and restored as part of the museum, its flank elevations abutting new buildings of the same height fronting Tottenham High Road. The rear elevation of the listed building will be encased within a new glass extension. As with the consented proposals, the development would also include private housing, which would be located in the south east corner of the site but has not yet been considered in any detail. A new element comprising a 24 storey hotel is intended to form a visible gateway into the site from the south.

#### *Policy Context*

Both Section 16 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings. It states that the determining authority, 'shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the obligation on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas and to preserving the settings of listed buildings.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development', where conserving heritage assets in a manner appropriate to their significance is one of the 12 core principles. NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter (paragraph 7) including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Section 12 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear at paragraph 132 that when considering the impact of a proposed development on a heritage asset (which includes its setting), 'great weight' should be given to preserving its significance. Any harm or loss should require a 'clear and convincing justification' (emphasis added).

Section 7 sets out policies requiring good design, and states in paragraph 58 that local authority policies should ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials.

Both the Mayor's Plan and Haringey's local plan include policies that seek to safeguard the significance of listed buildings and preserve or enhance the character or appearance of conservation areas.

#### *Historic England position*

The proposals will radically alter the setting of the grade II listed Warmington House. This 1828 detached villa is set back from the High Road, reflecting the pre-Victorian development pattern of the area. The current proposals to construct new structures hard against its flank elevations remove all sense of the house's original character as a detached villa. The spaces either side contribute to the understanding of the significance of the villa building type, and the recent removal of the ad hoc terrace enhanced the setting of the listed building. The rear garden will be encased in a glass box structure with a glazed roof at the same height as the parapet, with the rear elevation forming part of a new atrium. Whilst the front and rear elevations and interiors will be repaired and restored, the new development on either side will result in the listed building enveloped within a much larger modern development, and appearing as an illegible remnant of the historic High Road development. In our view, these proposals cause substantial harm to the grade II listed building by radically altering its setting (NPPF paragraph 132).

We are also concerned about the demolition of the locally listed buildings north of Warmington House, which are attractive in their own right and contribute positively to the listed building and the wider conservation area. Together the buildings (Nos. 746, 748 750) form a visually pleasing and architecturally varied group of buildings dating from the late 19th and early 20th centuries. Together with Warmington House they illustrate the High Road's historic development and form a notable group of historic buildings adjacent to the current stadium. Historic England believe that the buildings are integral to the significance of the conservation area and their demolition would result in substantial harm to the conservation area as the designated heritage asset.

The proposed tall building at the south east corner of the site has the potential to cause further serious harm to the conservation area and the setting of nearby listed buildings. Although no visual impact assessments have been carried out in detail at this stage, it is clear that this building, at 24 stories (92.5m AOD) is greatly out of scale with the much lower heights of historic buildings that are its immediate neighbours and which contribute positively to the significance of the conservation area. This extreme contrast in height would be very noticeable in views within and beyond the conservation area, resulting in the new tower visually dominating the traditional built form that contributes to the character of the conservation area and should be preserved or enhanced.

The NPPF requires that harm to the historic environment on the scale set out above requires clear and convincing justification and is necessary to achieve substantial public benefits that outweigh the harm. We accept that the stadium proposals will deliver a range of public benefits, but we note that many of these would be achieved with the previous consented proposals. Further harm cannot be justified on these grounds alone, unless there is something demonstrably unviable or now non-compliant about the previous proposals.

Other benefits being put forward to justify the harm are, in our view questionable. Securing the restoration and re-use of other listed buildings in the ownership of the club could be readily delivered without causing further harm elsewhere. The harm being caused is not necessary to deliver this benefit. Introducing a stronger linear development is not a public benefit that helps justify the harm to the historic environment. Whilst emphasising the linear pattern of development along the High Road may make sense in general urban design terms, the existing historic buildings on this site currently fulfil this role, albeit as four detached buildings with varying setbacks. Historically, there was never an unbroken line of development along a common set back here. In our view, the consented stadium, set slightly further back and curving away from the High Road, with the historic buildings retained at the southern end, causes less harm to the conservation area and settings of listed buildings than the proposed stadium development.

The retention of the historic buildings to the south west of the stadium does not appear to preclude the redevelopment of the site or the provision of safe movement in and out of it. We understand that the consented proposals are 'compliant' in terms of crowd safety management. Whilst the amended proposals may further ease

the movement of crowds through the provision of a wider pavement, on the basis of the information submitted thus far we are not convinced that this issue clearly justifies the further harm caused by demolition in that it is necessary as required by paragraph 133 of the NPPF.

### **Recommendation**

In summary, no clear and convincing case has yet been made to demonstrate that the substantial harm to the significance of Warmington House and to that of the conservation area is necessary to deliver any 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, and are therefore on current information and understanding contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England therefore raises strong objection to these pre-application proposals based on the current information. If the proposals become the subject for applications for listed building consent and planning permission, we will strongly advise that the applications are refused. If Haringey Council or the Mayor of London were 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 current lack of any policy support for the harm done.

Yours sincerely

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**Michael Dunn**

Principal Inspector of Historic Buildings and Areas

cc: Stephen Kelly, LB Haringey; Stewart Murray, GLA