

Report for: Cabinet, 20th June 2017

Item number: 15

Title: Conservation Area Appraisals and Management Plans for North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters/Page Green and South Tottenham.

Report

authorised by : Lyn Garner, Strategic Director Regeneration, Planning and Development

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Ward(s) affected: Northumberland Park, Bruce Grove, Tottenham Hale, Tottenham Green, Seven Sisters

Report for Key/

Non Key Decision: Key



1 Describe the issue under consideration

- 1.1 This report seeks Cabinet's approval for the adoption of six Conservation Area appraisal and management plan documents (attached at Appendices 4-9) that make up the Tottenham High Road Historic Corridor - North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters/Page Green and South Tottenham.
- 1.2 Cabinet approved the draft documents for public consultation in November 2016, which took place between 10th November 2016 and 22nd December 2016. The appraisals and management plans have been revised and updated as a result of the comments received to consultation where appropriate. The response to the consultation is summarised in the Consultation Statement (Appendix 1). Individual responses are detailed in Appendix 2.
- 1.3 Comments were also received on the proposals to amend the boundaries of the Conservation Areas. The recommended boundary changes have been amended having regard to representations received at consultation. They are shown on maps in Appendix 3 and summarised in section 6 below

2 Cabinet Member Introduction

- 2.1 Haringey's Local Plan recognises the wealth of heritage assets present across the borough that we need to conserve and, where possible, enhance. Having up to date conservation area appraisals and management plans is critical to ensuring we have identified the key historic characteristics and elements that make these areas special and worthy of protection. They will be used by the Council to inform our decisions about how best to manage these areas, including enforcement action and as a basis for determining the acceptability of development proposals. We also hope they will be of assistance to property owners in the maintenance and management of their own buildings.

3 Recommendations

- 3.1 That Cabinet:
- A. Notes the comments received to the consultation, and how these have been taken in to account in finalising the draft documents, highlighted in paragraph 6.7-6.11 and set out in detail in appendices 1 and 2.
 - B. Approves the adoption and publication of the finalised Conservation Area Appraisal and Management Plans as attached at Appendices 4-9.
 - C. Authorises the various changes to Conservation Area boundaries detailed in Appendix 3, including the removal of the Conservation Area designation from South Tottenham.

4 Reasons for decision

- 4.1 The Council has a statutory duty to ensure that conservation areas are preserved or enhanced and publish policies for the implementation of the same.
- 4.2 The current appraisals for the Tottenham High Road conservation areas have not been updated since 2009. Up-to-date appraisals and management plans will provide a sound basis for development management decisions which are defensible on appeal. The documents will also serve as a useful guide for the Council as well as the property owners and those putting forward heritage projects and development proposals as to how best to preserve or enhance the area's character.
- 4.3 The Conservation Areas fall within the area covered by the emerging Tottenham Area Action Plan, which promotes development and change along certain parts of the High Road. It is therefore important that the Council adopt these documents in order to support the Council's local plan policies and ensure that, where development and change is proposed, this takes into account the

significance of the area and opportunities to preserve or enhance its historic character.

- 4.4 The appraisals include recommendations for revisions to the Conservation Area boundaries as per the statutory duty under Section 69 of Listed Buildings and Conservation Areas Act 1990). The Council must ensure that designated conservation areas are of sufficient special architectural or historic interest to warrant designation, in line with the National Planning Policy Framework (paragraph 127) and Historic England guidelines.

5 Alternative options considered

- 5.2 The existing conservation area appraisal for the Tottenham High Road Historic Corridor was updated in 2009. However, continuing to use this document is not considered advisable. The area has undergone significant change since the document was written and it is therefore out of date. The emerging Tottenham Area Action Plan (Policy AAP5: Conservation and Heritage) indicates the need for review of such documents.
- 5.3 The appraisals include recommendations for alterations to the boundaries of the conservation areas. The option of leaving the boundaries as they currently are is considered but this course is not recommended. Some areas have been altered to such an extent that they no longer warrant statutory designation. The National Planning Policy Framework (Paragraph 127) states that “When considering the designation of conservation areas, local planning authorities should ensure that the area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest”. In cases where there is no discernable special character, the designation is unwarranted.

6 Background information

- 6.1 There are 29 conservation areas in Haringey designated under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. These are defined as “an area of special architectural or historic interest the character and the appearance of which is desirable to preserve or enhance”. The Council has a statutory requirement to ‘...*formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas*’ under Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 6.2 The Council is undertaking a rolling programme of producing Conservation Area Appraisals and Management Plans, and reviewing those existing appraisals that

are outdated. The conservation areas of the Tottenham High Road Historic Corridor were originally designated between 1972 and 1998, and together form a continuous corridor covering the historic arterial route from the borough's boundary with Hackney in the South, to the boundary with Enfield in the North. These were prioritised because of development aspiration in Tottenham and the need to ensure this is sensitively undertaken to conserve or enhance the historic environment in Tottenham.

- 6.3 The Appraisals follow guidance published by Historic England and were undertaken by independent consultants. They clearly identify those elements that make the area special including an audit of buildings, and provide further guidance on what kinds of development is appropriate. The documents also include a review of conservation area boundaries – essential to ensure conservation area designations are warranted, meaningful, and in line with statutory and national policy requirements. When adopted, the documents have the status of evidence-base documents which aid the implementation of approved development plan policies for the preservation and enhancement of conservation areas and are a material consideration in the determination of planning applications. The documents have been screened and it was determined that a Strategic Environmental Assessment under the provisions of the SEA Directive (European Directive 2001/42/EC) is not appropriate in this case.
- 6.4 It is important to stress that a character appraisal or management plan ***cannot introduce new policy***. The purpose of the appraisal and management plan is to provide a clear indication of the Council's approach to the preservation and enhancement of the conservation areas, as well as supporting existing planning policy already set out in the Local Plan.
- 6.5 An adopted character appraisal provides a sound basis, defensible on appeal, to implement the Council's approved development plan policies and to inform development management decisions. The appraisal is for the use of local residents, community groups, businesses, property owners, architects and developers and is an aid to the formulation and design of development proposals and change in this particular area. The document will be used by the Council in the assessment of all development proposals and will be taken into account by the Planning Inspectorate when it considers and determines planning appeals.
- 6.5 The character appraisal is also helpful to those considering investing in the area, and can be used to guide the form and scale of new development proposals. When funding was sought for grant aid schemes, such as the Townscape Heritage Initiative at Bruce Grove, an adopted character appraisal was essential to demonstrate the value of the area.

Structure of the Conservation Area Appraisal and Management Plan Documents

- 6.6 The Conservation Area Appraisal and Management Plan documents have been written to reflect the framework set out in *Understanding Place: Conservation Area Designation, Appraisal and Management*, published by Historic England in March 2011. A brief structure of the documents is set out below:

Appraisal

- **The summary of special interest:** a succinct description of the overall character of the conservation area.
- **Comprehensive appraisal:** recording the special character of the area covering;
 - location and setting
 - historical development and archaeology
 - architectural quality
 - public realm
 - condition and development pressure.
- **Audit:** A record of all buildings in the area, indicating whether they are make a positive, negative and neutral contribution.

Management Plan

- **Principles for development management:** Setting out the Council's approach to managing new development, including when planning permission is required, expectations for applications, and relevant policies.
- **Boundary Review:** Recommendations for changes to the conservation area boundaries are shown in the maps provided in appendix 3.
- **Preserving and Enhancing the Conservation Area:** A comprehensive new set of accessible illustrated Design Guidelines detailing how the special character should be preserved or enhanced covering;
 - Shop front design
 - Making changes to listed buildings
 - Extensions
 - External Maintenance and facade restoration
 - Window and door replacements

Please see appendices 4 – 9 for the draft documents in full.

Community Involvement and Public Consultation

- 6.7 The Tottenham Conservation Area Advisory Committee were consulted during the production of the documents, and were given a chance to review the draft document and make comments before publication. Ward councillors for those wards affected were also given the opportunity to comment prior to publication.
- 6.8 A six week Public consultation of the draft documents was undertaken from the 10th November to the 22nd of December 2017 in line with the Council's Statement of Community Involvement (SCI). Two public meeting were held as part of the consultation process, in line with the requirements of Section 71 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Consultation responses were collated and analysed in the Consultation Statement included at Appendix 1. Respondents included residents and business owners, with detailed representations from Tottenham CAAC, Page Green Residents Association, and Tottenham Hotspur Football Club.
- 6.9 Comments from statutory consultees such as Historic England have also been received. These have been discussed in the specific sections of each of the conservation areas.
- 6.10 Consultation comments generally emphasised the need to protect the character of the Conservation area. Some expressed general concerns about the effect of future development, and the need for more effective enforcement against inappropriate changes. Among those who did not support the adoption of the document as published, the main concern was specific proposed boundary alterations which were felt to be inappropriate. These have been carefully considered, and in some cases the proposed new boundary has been altered to better reflect the views of the local community.
- 6.11 Based on the consultation comments, the final boundary alterations are as follows:

North Tottenham

- **Remove the Conservation Area designation from the area north of Brantwood Road:** There are no remaining buildings of architectural or historical interest in this section.
- **Redraw the boundary to exclude the new Sainsbury's development on Northumberland Park:** Historic buildings in this section have been demolished and replaced with the new Sainsbury's supermarket.
- **Remove the conservation area designation from the southern section of White Hart Lane:** In response to consultation comments, it is agreed that section between 7 White Hart Lane (listed grade II) and the White Hart Lane Station (locally listed) the boundary only includes a

modern wall and open space fronting the housing estate. This section is not considered to be of sufficient special interest to justify conservation area designation.

- **Remove the Conservation Area designation from the central section of the high road, from just north of Moselle Street to Brereton Road, and the east side of the High Road only between Brereton Road and Park Lane:** All of the buildings on the east side of the High Road have been demolished as part of the redevelopment of the Spurs football ground, with the exception of Warrington House (No. 744) which will be incorporated within a new facade. The overwhelming scale of the new development will dominate the street and have a major impact on the character of this part of the conservation area.

The remaining buildings on the west side of the High Road, taken by themselves, are not considered of sufficient special interest to justify conservation area designation in accordance with NPPF.

Historic England have objected to this proposal stating *“Whilst the section proposed for de-designation does not contain buildings of consistent quality as those to the north and south and is undergoing relatively seismic change in respect of redevelopment on the east side, we would not consider the removal of a connecting section of conservation area (noted for historic interest lying in the ribbon development of one of London’s principal historic thoroughfares) as good practice. A better approach would be to take a closer management of how change in the conservation area can ensure that this linear nature and the ability to understand the development of the different historic layers that comprise it can be reinforced through sensitive new development and the enhancement of those positive elements of the historic environment. Whilst the NPPF states that CA’s and areas within CA’s should demonstrate sufficient historic character to warrant designation that it is fundamental to the character that it is an “area” defined by a common set of heritage values. [...] In the instance of North Tottenham I would suggest that the boundary change would be best served by retaining the west side of the street within the CA and a set of positive strategies and guidance set out to manage change in a positive way.”*

The comments from Historic England have been considered carefully. Whilst their group value in maintaining the linearity and continuity of the High Road is acknowledged, their architectural quality and integrity has been compromised to such an extent that their inclusion will undermine the quality and integrity of the rest of the conservation area which is of much higher quality. This would be against NPPF paragraph 127 (see paragraph 5.3) and it is therefore proposed to remove this section of the High Road from the Conservation Area.

Following comments from the Tottenham CAAC, it is proposed to retain St Francis de Sales Church and grounds within the Conservation Area based on their special historic character.

The Inspector's report into the Tottenham Area Action Plan has been received since the consultation on the Conservation Area amendments. This set out the following amendments to the Tottenham High Road policy: 'AAP8 - Tottenham High Road. Tottenham High Road is an example of an area of very high heritage value where there are allocations for a significant amount of development to enable regeneration of the area. To ensure that the heritage of Tottenham High Road as a whole is protected modification **TAMM30** to policy AAP8 makes clear that regeneration of the high road should be heritage-led. Without this modification the policy would not be consistent with the Framework which seeks conservation and protection of the historic environment.' This change has been agreed and is being included in the modifications to the Area Action Plan which is proposed to be adopted at July full Council pending a recommendation from June Cabinet.

The above changes to the High Road Conservation Area have been considered in the light of this amendment and are still considered to be appropriate. Given the proximity of the areas that are being removed from the Conservation Area to the remaining Conservation Area and the resulting impact on the setting of the remaining Conservation Area from development in these areas development will still need to be Heritage led in these areas.

Scotland Green

- **Modify the boundary to exclude the flats on the east side of Kenmare Drive, and the infill housing development on the east side of the High Road behind the frontage buildings:** Neither of these housing developments are of special interest. It is recommended that the boundary is redrawn at the rear of the frontage buildings. The Friends Burial Ground should remain a part of the conservation area.

Bruce Grove

- **Modify the western boundary of the conservation area to exclude parts of St Loy's Road, Forster Road and Felixtowe Road:** The terraced houses in these streets are of modest architectural quality which has been undermined by piecemeal alterations and loss of features. As a group, they have little or no visual relationship with the high road.
- **Extend the southern boundary to include part of the current Tottenham Green Conservation Area:** These buildings form part of the townscape of Bruce Grove.
- **Extend the western boundary to include part of Bruce Grove which currently sits within the Bruce Castle Conservation Area:** This

section is historically connected with the development of the high road and properly belongs within the Bruce Grove Conservation Area.

Tottenham Green

- **Modify the north-western boundary to exclude Eleanor Close and Library Court:** This land has been redeveloped with new housing that makes no contribution to the special character of the area.
- **Modify the western boundary to exclude the north side of Philip Lane and the forecourt of the Tottenham Green Centre:** The terraces on Philip Lane are of very modest architectural quality and have been badly compromised by alterations. The forecourt and parking area of the Tottenham Green Centre is considered a detracting feature and does not contribute to the conservation area.
- **Modify the western Boundary to exclude the redeveloped Clyde Road Depot site:** The character of this area has been radically altered and it no longer makes a positive contribution to special architectural or historic character.

Seven Sisters

- **Modify the eastern boundary to exclude the large Tesco site (No. 230):** The large scale and visual impact of this building detracts from the quality of the townscape.
- **Modify the eastern boundary to exclude the open space and Priscilla Wakefield House on Rangemoor Road.** This is not a historic open space and has little or no visual relationship with Page Green Common. The building makes no contribution to character.
- **Modify the southern boundary to include the Dutch House public house and the area in front of South Tottenham Station which is currently part of the South Tottenham Conservation Area:** It is recommended that the South Tottenham Conservation Area is dedesignated, however the Dutch house and South Tottenham Station area are of sufficient special interest to warrant Conservation Area designation and can be best managed as part of the Seven Sisters Conservation Area.

South Tottenham

It is recommended that the conservation area is dedesignated: The special interest of the area is affected by the very modest architectural merit of the surviving Victorian/Edwardian built fabric, the level of alteration that has taken place, and the significant number of buildings fronting the High Road that detract from or contribute little to the streetscape. It is not considered to be of

sufficient special interest to warrant conservation area designation. Those buildings which retain some significance should be protected through statutory listing (St Ignatius Church) or local listing. It is also recommended that the Dutch House public house is incorporated within the Seven Sisters conservation area to the north.

In their comments, Historic England have agreed with this approach stating- *“In respect of South Tottenham, the arguments set out in the consultants appraisal are clear and I would agree that the townscape is in general of a relatively fragmentary significance and quality than the earlier and older corridor to the north. The statutory and local protection identified, and migration of the north east corner of the CA into the Seven Sisters CA, would offset some of the potential loss of the broader positive strategy that conservation area might provide. [...] In the instance of South Tottenham I am therefore relatively happy that the changes can be considered justified when considered against evidential, historic and aesthetic and communal values, and when set against the NPPF requirements”*.

Historic England have also suggested that further local guidance on character and distinctiveness could help to define how local landmarks and views might be enhanced whilst acknowledging that the area does not possess the cohesive historic character and appearance sufficient to warrant CA status. The Council has already undertaken the Urban Characterisation Study that identifies certain views and local landmarks within the area. This document has informed current DMDPD policies as well Tottenham Area Action Plan that incorporates recognition of views and landmarks.

Next Steps

- 6.12 If Cabinet agrees with the Appraisals and the recommendations within the Management Plans, All residents would be sent a letter through post notifying them of the outcome of the consultation and the decision of the cabinet. A press release would be issued in Haringey Independent and in London Gazette as per statutory requirements of Section 70(8) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Those residents that are affected by the boundary alterations would also be notified and Local Land Charges would be updated to reflect these alterations. Additionally, Local Plan documents, Proposals Map and other databases would also need to be updated to reflect the boundary alterations.

7 Contribution to strategic outcomes

- 7.1 The Appraisal and Management Plan documents support the Council's strategic objective 3 (A clean and well maintained and safe borough where people are proud to live and work) by providing a document that highlights the architectural and historical significance of the area. It also gives guidance on how the area can be maintained and enhanced in the future for our future generations to enjoy.

8 Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Assistant Director of Corporate Governance and legal implications

- 8.1 As noted in the report there is a duty under section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) ("the Act") for a local planning authority ("LPA") from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and shall designate those areas as conservation areas. Under section 69(2) of the Act from time to time the LPA shall review the past exercise of the functions noted above. The appraisals are part of this review process.
- 8.2 The designation of a conservation area will have several planning consequences. These include (and are not limited to):
- Restrictions (and potential criminal offence) concerning demolition in a conservation area without express planning permission.
 - The statutory duty under section 72 of the Act will be engaged, when determining planning applications in a conservation area to pay special attention to the desirability of preserving or enhancing the conservation area.
 - The statutory duty noted in the report under section 71 of the Act from time to time to formulate, publish proposals and hold a public meeting about them, for the preservation and enhancement of the conservation area. As the report notes the appraisals will assist in the formulation of these proposals in the development plan policies.
 - In determining planning applications, these policies regarding conservation areas will then become engaged. Part 12 of the government's National Planning Policy Framework will also apply.
 - Restrictions on cutting down, topping, lopping, or uprooting trees in a conservation area.
 - Greater restrictions for certain otherwise permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the GPDO").

- Restricts the power of the secretary of state to cancel or modify an immediate article 4 direction (restricting permitted development rights) under the GPDO for certain classes of development.
- Greater controls to display certain types of advertisement under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

8.3 No formal consultation requirements are imposed by the Act, however as the report states there has been public consultation lasting 6 weeks. A public meeting was arranged, and all the consultation responses have been considered.

Equality

8.4 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- tackle discrimination, harassment and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

8.5 This report does not introduce any new policy. The guidance in the document clarifies how the Council's existing planning policy will be implemented, and relates mainly to the architectural character of buildings in the area. It will apply equally across the area.

8.6 The community was consulted on the draft conservation appraisals and management plans, in accordance with the Council's Statement of Community Involvement. Input from the community has informed the finalised documents. No concerns from particular communities or groups of residents, relating to either our statutory equality duties or our commitment to a fair and equal borough, arose from this consultation.

8.7 The outcome of the consultation and decision, including a Consultation statement summarising comments received and the Council's response, will be publicised in accordance with the Council's Statement of Community Involvement. Documents relating to the Consultation, and information about how residents with questions about the outcome can get in touch, will be available on the Council's Website.

Finance and Procurement

- 8.8 Any costs associated with publication of the adopted character appraisal will be contained within existing approved budgets for Planning Policy & Design.

9 Use of Appendices

Appendix 1: Consultation Report

Appendix 2: Responses received at consultation

Appendix 3: Maps showing proposed boundary alterations, revised having regard to representations received

Appendix 4: North Tottenham Conservation Area Character Appraisal and Management Plan

Appendix 5: Scotland Green Conservation Area Character Appraisal and Management Plan

Appendix 6: Bruce Grove Conservation Area Character Appraisal and Management Plan

Appendix 7: Tottenham Green Conservation Area Character Appraisal and Management Plan

Appendix 8: Seven Sisters/Page Green Conservation Area Appraisal and Management Plan

Appendix 9: South Tottenham Conservation Area Appraisal and Management Plan

10 Local Government (Access to Information) Act 1985

- a) Cabinet Member Report dated 1st November 2016: Conservation Area Appraisals and Management Plans for North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters/Page Green and South Tottenham.
<http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=435&MIId=8049> (Item 5)
- b) Planning (Listed Buildings and Conservation Areas) Act 1990
- c) National Planning Policy Framework (NPPF), March, 2012;
- d) Historic England Advice Note 1, Conservation Area Designation, Appraisal and Management, February 2016
- e) Understanding Place: Conservation Area Designation, Appraisal and Management, Historic England, March 2011