

Consultation Statement

On the draft Conservation Area Appraisals for the Tottenham High Road Historic Corridor, including North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters and South Tottenham Conservation Areas.

January 2017

1. Consultation Overview

- 1.1** In 2016 the Council produced new Conservation Area Appraisal and Management Plans for the six Conservation Areas making up the Tottenham High Road Historic Corridor, as part of our ongoing programme to renew Conservation Area Appraisals across the borough. The new documents, researched and written by heritage consultants, include detailed design guidelines and a review of conservation area boundaries, recommending that Conservation Area designation is removed in certain areas.
- 1.2** The council approved a six-week consultation on the draft document in November 2016, aimed at gauging public support for the adoption of the documents and giving residents the opportunity to comment in detail on the documents and make suggestions.
- 1.3** A total of 63 responses were received – the majority from local resident but also including responses from Tottenham Conservation Area Advisory Committee, Page Green Residents Association, Historic England, and Tottenham Hotspur Football Club. Among those respondents who did not support the adoption of the documents, the overwhelming majority sighted concerns relating to the proposed boundary changes.
- 1.4** The consultation was carried out in line with relevant statutory requirements and the Council's statement of community involvement (SCI).

2. Methodology

- 2.1** The consultation took place between 10th November 2016 and 22nd December 2017. Letters were sent to all addresses on the Council's database within each conservation areas explaining the purpose of the consultation, the proposed boundary changes, summarising how the changes would affect residents, and detailing how to take part. The letters included a questionnaire to be returned to the Council as well as a colour map showing the proposed boundary changes for that Conservation Area.
- 2.2** A notice was placed in the Haringey Independent on the 11th November stating the dates of the consultation, where to view the document and how to respond. Relevant information was made available on the Council's website where the documents were available to download.

- 2.3** Paper copies of the document were made available to view at Coombe's Croft Library, Marcus Garvey Library, River Park House, and Haringey Civic Centre.
- 2.4** Consultees were invited to submit comments either through an online questionnaire accessed from the council's website, through a printed questionnaire submitted by post, by email, or in person at one of the public meetings.
- 2.5** Section 71 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that proposals for the preservation and enhancement of Conservation Areas (such as the new Appraisals and Management Plans that were the subject of this consultation) are submitted for consideration to a public meeting in the area to which they relate. Two public drop in meetings were held in the area: On 24th November at Tottenham's Living Room (639 Enterprise Centre) and on 8th December at N17 Design Studio. Council officers were available to discuss issues and answer questions. There were 18 attendees in total.

3. Summary of responses

- 3.1** Following the consultation, all comments received were analysed. There were a total of 63 responses. 29 were submitted by post, 5 by email, and 29 via the online survey.
- 3.2** 13 respondents supported the adoption of the draft documents in their current form; 44 respondents objected. The majority of this second group raised specific concerns related to some of the proposed boundary changes and their possible impact on the character of the area, including a strong response from members of the Page Green Residents Association objecting to some of the proposed boundary alterations to the Seven Sisters/Page Green Conservation Area. There were no objections to the proposed removal of Conservation Area designation from South Tottenham.
- 3.6** The table on the next page summarises the main issues arising from consultation responses, and the Council's response to them.

| Theme | Council response and amendments |
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| General | |
| A number of general statements of support for the conservation of historic buildings, and protection for local character and views. Comments to the affect that more should be done to protect the Conservation Area. | <p>It is hoped the new document will be a valuable tool in the proper management of the area, including the protection of significant buildings, enforcing against inappropriate changes, and ensuring that new development does not cause harm to the character of the area.</p> <p>Amendment to all townscape maps to indicate the positions of important views within each Conservation Area.</p> |
| Concerns related to enforcement, especially signage and shop fronts along the high road. Suggestions that council could/should do more to enforce planning rules. Suggestions that the new documents could be more explicit about what we will do in the future to enforce rules. Support for the new shop front guidelines. | <p>The new design guidelines contain very detailed guidance on shop fronts and signage, setting out exactly what will and will not be considered appropriate in the future.</p> <p>Amendment to 2.5.1 To clarify commitment to enforcement against unauthorised signage and shop front alterations, in line with our enforcement charter.</p> |

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| <p>Generalised concern about the impact of recent and future development on the conservation area. Comments refer to tall buildings, height, density, and general loss of character. General concern that the new documents might be used as a tool to facilitate inappropriate development.</p> | <p>We believe that development in the Conservation Area, as well as development affecting its setting, must enhance the area through high quality appropriate design and a good understanding of local character. This has not always been the case in the past, but this document will be a valuable tool to achieve this going forward. Additionally, the council's emerging local plan policies DM9 (in the emerging Development Management DPD) and AAP5 (in the emerging Tottenham Area Action Plan) set out our approach to development proposals affecting heritage assets or their setting.</p> |
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| <p>A number of concerns about the removal of the conservation Area designation from the open space on Rangemoor Road. Comments included details of its value to the local community, and claims that it is a historic open space and therefore of special significance.</p> | <p>The Council recognises the importance of green space/open space. These spaces are protected and their importance recognised by local plan policies DM20 in the emerging Development Management DPD, and SP13 in the Strategic Policies,</p> <p>Rangemoor Road open space is not a historic open space. Historic maps (p12) and photographs (p13) show a terrace of houses on the site between 1894 and 1961. The space is not considered to be of historical significance and therefore should not be part of the conservation area.</p> |
| <p>A number of concerns about the removal of the conservation area designation from houses on Wakefield Road. Comments suggest; that the terrace contributes to views from Page Green Common; that the properties were previously included in the conservation area and it is not clear what has changed.</p> | <p>The Conservation Area boundary has been amended to include two terraces on Wakefield Road. This is in response to comments pointing out that these houses contribute to views from Broad lane and Page Green, and broad support among the local community for the inclusion of these buildings in the Conservation Area. A further site visit confirmed the contribution these buildings make to views from the green.</p> |
| <p>Concerns over the effect of proposed boundary alterations, especially that they might allow for redevelopment of the areas excluded from the Conservation Area, or cause other damage to character or the local community. Concerns over the rationale behind the proposed boundary alterations, especially that they may have been proposed to facilitate development proposals or plans for future development.</p> | <p>The Council has a statutory duty to review Conservation Area designations from time to time. Proposed boundary alterations are based solely on a thorough appraisal of the area's significance and an assessment of whether the designation accords with national legislation and policy requirements.</p> <p>These changes have not been made in response to development proposals and should not be taken as an indication that development proposals for these areas are likely to come forward. Any development adjacent to conservation areas also needs to satisfy NPPF requirement that development affecting the setting of heritage assets should enhance them.</p> |
| <p>Concerns that poor past enforcement of planning rules, and a lack of clear information about what is appropriate have lead to the current poor condition of some areas. Support for greater use of enforcement powers, rather than removal of Conservation Area Designation.</p> | <p>Amendment to all management plans (paragraph 2.5.1 or equivalent) to clarify commitment to enforcement in line with our enforcement charter.</p> <p>The new document includes detailed design guidelines aimed at clarifying what changes are considered appropriate, and communicating this in an accessible way.</p> |

North Tottenham Conservation Area Boundary Alterations

A number of different suggestions for various amendments to the proposed boundary alterations.

The proposed boundary has been amended in a number of places in response to consultation comments: To include St Francis de Sales Church and presbytery, based on its contribution to special historic character; to exclude the ramp leading to Lilywhite house; and to exclude forecourt areas on the south side of White Hart Lane.

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| <p>Concerns over the rationale behind the proposed North Tottenham boundary alterations, especially that they have proposed to facilitate development proposals or plans for future development. Concerns that the changes will lead to further loss of character/historic buildings in this area.</p> | <p>The Council has a statutory duty to review Conservation Area designations from time to time. Proposed boundary alterations are based solely on a thorough appraisal of the area's significance and an assessment of whether the designation accords with national legislation and policy requirements.</p> <p>In some cases the proposals reflect the fact that special character has been lost due to development which has already taken place. The changes have not been proposed in response to proposals for future development and should not be taken as an indication that development proposals for these areas are more likely to come forward.</p> |
| <p>Consultation Procedures</p> | |
| <p>Some concerns raised over how the consultation was organised. Suggestions that the Council's decision to organise drop-in meetings as part of the consultation did not comply with statutory requirements.</p> | <p>Section 71 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that proposals for the preservation and enhancement of Conservation Areas (such as the new Appraisals and Management Plans that were the subject of this consultation) are submitted for consideration to a public meeting in the area to which they relate. Two public drop in meetings were held in the area: On 24th November at Tottenham's Living Room (639 Enterprise Centre) and on 8th December at N17 Design Studio. Council officers were available to discuss issues and answer questions. Drop-in meetings are considered to be an inclusive approach to public engagement, as set out in the Council's Statement of Community Involvement.</p> <p>In addition to this statutory requirement, a number of approaches were used to publicise the consultation and facilitate engagement in line with the council's Statement of Community involvement.</p> |

4. Next steps

- 4.1** We have considered all comments and where appropriate, have suggested amendments to the document to reflect consultation comments (detailed in the table on page 7).
- 4.2** The consultation exercise is considered to be successful, demonstrating engagement from local community groups, support for the broad aims of the document and conservation aims in general, and providing useful input so that the final document and reviewed Conservation Area Boundaries will better reflect the needs and outlook of the local community.
- 4.3** The final amended Appraisal and Management Plans will be referred back to the cabinet for adoption in April 2017.

5 Schedule of Amendments

| | Amendment | Rational |
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| 2.5.1 in the North Tottenham Management plan and equivalent paragraph in the other four management plans. | <p>The Council has an adopted Planning Enforcement Charter and will investigate and, where necessary, take enforcement action against unauthorised works in the Conservation Area.</p> <p>Advertisement and signs: The Council is committed to taking enforcement action against inappropriate signage and advertising. Where this is not historic, appropriate notices are being served and actions have been taken. The Council will continue to do so in the future.</p> <p>Section 215 Notices: These have been served on properties that 'adversely affect the amenity of the area'. The Council will continue to serve such notices where deemed appropriate in a case by case basis and in line with the provisions of the legislation.</p> | Additional text to clarify commitment to enforcement |
| Section 2.8 in the North Tottenham document. Paragraph 2.7.8 | <p>However, the NPPF states in Paragraph 127 that "When considering the designation of Conservation Areas, local planning authorities should ensure that an 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 this case it is doubtful whether the buildings on the west side of the High Road would, on their own, be considered of sufficient special interest to justify continued Conservation Area designation. Therefore the second option, which is recommended here, is to remove the Conservation Area designation from this subsection (sub-area C) consolidating the Conservation Area into two sections consisting of sub-areas A and B, and sub-areas D and E. Sub-area C would still form part of the setting of the Conservation Area and, in considering proposals within sub-area C, the Council would consider possible impacts on the character and appearance of the Conservation Area. Proposals would be expected have regard to the linearity the High Road which is an important aspect of its character.</p> | Text to clarify the management of the central section of N Tottenham Conservation Area following boundary alterations, in response to consultation comments. |
| Section 2.8 in the North Tottenham document. Paragraph 2.8.9 | <p>The possibility of including St Francis de Sales Church (on west side of the road) as part of sub-area D and therefore allowing it remain a part of the conservation area was considered. However the church (and adjacent presbytery) is separated from the frontage to the south by a large open playground which does not make a positive contribution to character, and does not properly form part subsection D, therefore this option is not recommended.</p> <p>It is recommended that St Francis de Sales Church and adjacent Presbeterly (on the west side of the road) are included in the Conservation Area as part of sub-area D.</p> | Alteration to proposed Conservation Area boundary in response to consultation comments |

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| | The position of the Conservation Area boundary on the south side of White hart Lane has been adjusted to exclude forecourt areas, as these do not contain any buildings and make no contribution to architectural or historic interest. | |
| Map 16. In the North Tottenham document | Map altered to reflect the changes detailed above. | |
| Map 16. In the North Tottenham document | <p>The following minor mapping errors are corrected:</p> <ul style="list-style-type: none"> - A number of Statutory listed buildings were not indicated as such on Map 16. This has been corrected. - The ramp leading to Lilywhite house was mistakenly included in sub-area A. The boundary has been amended to include it in sub-area C, which will be removed from the Conservation Area. | Correction of minor errors pointed out at consultation |
| Section 2.8 in the Seven Sisters/Page Green document | <p>B Modification of the eastern boundary to exclude part of Wakefield Road, Rangemoor Road and Harold Road The terraced houses in these streets follow a typical pattern seen in the wider area, and their modest architectural quality has been significantly undermined by piecemeal alterations and loss of original features. As a group they also have little or no visual relationship with Page Green Common.</p> <p>B Modification of the eastern boundary to exclude Priscilla Wakefield House and the open space on Rangemoor Road The Rangemoor Road open space is not a historic open space and has little or no visual relationship with Page Green Common. Priscilla Wakefield House does not make a contribution to arechitectural or historic interest.</p> | Alteration to proposed Conservation Area boundary so that the houses on Wakefield Road are not excluded, in response to consultation comments. |
| Map 12. in the Seven Sisters/Page Green document | Map altered to reflect the changes detailed above. | |
| All Townscape maps for North Tottenham, Scotland green, Bruce Grove, Tottenham Green and Seven Sisters/Page Gren | All maps altered to show important views within each conservation area. | Alteration in response to comments emphasising the need to protect views within the conservation area. |