

HERITAGE IMPACT ASSESSMENT (ADDENDUM)

HIGH ROAD WEST [REF: HGY/ HGY/2021/3175

LONDON BOROUGH OF HARINGEY

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1. **ADDENDUM [FOLLOWING COMMENTS RECEIVED FROM TOTTENHAM HOTSPURS]**

- 1.1 This is an addendum to respond to a number of points raised the Tottenham Hotspur Football Club (THFC) in their letter dated 20th July 2022. The following paragraphs deal solely with the heritage issues and does not comment on any other matters raised by the Club. I will address these in the sequence they have followed.
- 1.2 In paragraph 3.2 of their letter, the Club have requested a clarification on my role and the Council Officer's role. In response, I would highlight the 'brief' provided to me by the Council before my appointment.
- 1.3 Firstly, the Council approached me to comment given my past experience within the Borough, as the Principal Conservation Officer between 2013 and 2018. During this time, we worked comprehensively towards seeking a strong policy framework, including the Tottenham Area Action Plan (AAP), setting out the manner in which regeneration of Tottenham could be delivered within the very sensitive context of Tottenham.
- 1.4 Following the submission of the Lendlease Masterplan, I was asked to undertake an independent assessment of the ES Chapter on Built Heritage Townscape Visual Impact Assessment already submitted as part of the application, and supplement it if necessary, so the Council could comfortably assess the application, having regard to their statutory duty.
- 1.5 The scope of my involvement is explained in paragraphs 1.5 and 1.6.
- 1.6 Paragraph 3.4 of their letter questions my decision to consider the extant permissions as a baseline and not including them in my assessment.
- 1.7 Both these applications have already been considered by the Council. In the case of Goods Yard, which was an outline application, the putative reasons for refusal no 4, stated that:
- 1.8 "In absence of a planning obligations agreement, the planning balance between harm to heritage assets and public benefits is not able to be determined and the less than substantial harm to heritage assets has been given appropriate weight..."
- 1.9 The Inspector, however, in his decision to allow the scheme, stated (para 50):

“I conclude that the less than substantial harm to the significance and setting of the Conservation Area and to listed and locally listed buildings within the area by reason of the bulk, scale and massing of the towers and other buildings within the appeal development would here be outweighed by the above public benefits of the development.”

- 1.10 Similarly, in respect of the Depot Scheme, the Council’s planning committee, on recommendation from Officers, granted permission for an outline application for the redevelopment of the Site as well as a detailed Listed Building Consent for Nos 867-869 High Road.
- 1.11 Bearing in mind the above decisions, I am not in a position to infer or comment further on any heritage harm, which have clearly been considered as part of the relevant permissions.
- 1.12 In paragraph 3.7 the Club have questioned the methodology applied for the assessment in this instance. As explained in Chapter 2 of the document, the methodology was applied in order to assess the levels of less than substantial harm in order to provide clarity.
- 1.13 Members should note that Heritage Impact Assessments undertaken for outline applications, often form part of

Environmental Impact Assessments (EIA) or simply referred to in the Environmental Statement (ES). They are also undertaken for Site Allocations as part of Local Plan process. For example, I have undertaken similar assessments on behalf of Northampton Council, looking at four key sites. Equally, I have undertaken Impact Assessments for Taylor Wimpey on one of their larger sites near Milton Keynes.

- 1.14 Neither the NPPF nor Historic England have an adopted methodology for EIAs, particularly when it comes to outline applications with parameters plans. However, over the years, various guidance and frameworks have provided a rough methodology, and my assessment was rooted in the same. This includes:
 - The Landscape Institute and Institute of Environmental Management and Assessment, Guidance for Landscape and Visual Impact Assessment (GLVIA) Third Edition, 2013;
 - National Planning Policy Framework, 2021;
 - National Planning Practice Guidance;
 - Historic England, Conservation Principles Policies and

Guidance, 2008;

- Historic England, Historic Environment Good Practice Advice in Planning, Note 3: The Setting of Heritage Assets, 2017 (2nd Ed);
- Historic England, Historic Environment Good Practice Advice in Planning, Note 4: Tall Buildings 2015;
- The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015); and
- ICOMOS Guidance on Heritage Impact Assessments of Cultural World Heritage Site.¹

1.15 Given the scale and outline nature of the development this methodology is appropriate. Indeed, a similar approach was included in the Heritage Assessment chapter of the EIA for the extant Goods Yard extant scheme. There are other methods that may be equally appropriate. Paragraph 1 of the Guidance Note on Settings of Heritage Assets by Historic England (GPA

3) suggests:

“This good practice advice acknowledges the primacy of the NPPF and PPG, supporting the implementation of national policy, but does not constitute a statement of Government policy itself, nor does it seek to prescribe a single methodology or particular data sources. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.”

1.16 Most importantly, the purpose of the Heritage Impact Assessments is to understand where there would be likely impacts to heritage assets and what site-specific policies and/or design codes could be applied to ensure that harm is avoided all together or minimised. The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015) supports this (para 3.3) “Design principles (and design codes) are a helpful way of making development more sustainable and acceptable. These can be set out in a site specific policy or appropriate equivalent and will guide future

¹ Whilst it is acknowledged that there are no World Heritage Site, the ICOMOS guidance includes example tables in the appendices which are useful tools and have been used regularly as good practice guide.

masterplans and planning applications.”

- 1.17 Indeed, this was the observation made by the Inspector as part of their decision for the Goods Yard extant permission (para 47):

“Parts of the lower buildings on the appeal site could also appear above the rooflines of the frontage listed and other buildings in some views from outside the Conservation Area including in views across White Hart Lane from Love Lane and William Street. They would be much closer to the buildings in the Conservation Area, but their lower height would result in a less dramatic contrast than would the towers. What effect these may have would depend on their final design, but they are also likely to result in some less than substantial harm to heritage significance by reason of their different bulk, scale and massing when compared to the modestly proportioned historic buildings on the frontage.”

- 1.18 Additionally, all applications that impact on heritage assets, at Reserved Matter Stage would require a detailed Heritage Statement as per statutory and policy requirements. Here the detailed designs, architecture and true impact of the proposal, harmful or beneficial, would be assessed against the adopted local and National policies. For example, Policy 5 of the AAP,

deals specifically with the heritage assets and requires to a “well-managed” and “balanced” approach to the historic environment. It further states that “the Council will seek to strengthen the historic and local character of Tottenham by conserving and enhancing heritage assets, and their setting.”

POLICY AAP5: CONSERVATION AND HERITAGE

A The Council will seek to deliver growth and regeneration in Tottenham through well-managed and balanced change whilst ensuring historic environments continue to contribute to the needs of local communities. To achieve this aim the Council will seek to strengthen the historic and local character of Tottenham by conserving and enhancing heritage assets, their setting, and the wider historic environment. This includes reviewing Conservation Area Appraisals and Management Plans where appropriate. Proposals for new development will be required to:

- a Reflect, where available and relevant, character and heritage appraisals, statements and management plans for the area and/or heritage assets;
- b Identify and positively respond to the distinctive character and significance of heritage assets and their settings, whilst balancing the need to sensitively facilitate neighbourhood regeneration and renewal;
- c Maximise opportunities for integrating heritage assets within new development and enhance connectivity between them;
- d Put heritage assets to viable uses consistent with their conservation, including through the adaptive re-use of vacant historic buildings, reinstating street frontages and historic street patterns, wherever possible.

1.19 The AAP is part of the Council's Local Plan Framework which also includes strong overarching policies regarding Design and Heritage in SP 11 and 12 and DMDDP policies DM1, DM6 and DM9. In addition to these policies, the National Planning Policy Framework (NPPF) and the statutory duties placed under the Planning (Listed Buildings and Conservation Areas) Act, 1990 (as amended) places even greater emphasis on the historic environment. Any future development and detailed proposals must adhere to these statutory and policy framework.