

Heritage Statement

The Drapers Almshouse Charity

Edmansons Close
London

August 2022

SmithJenkins
PLANNING & HERITAGE



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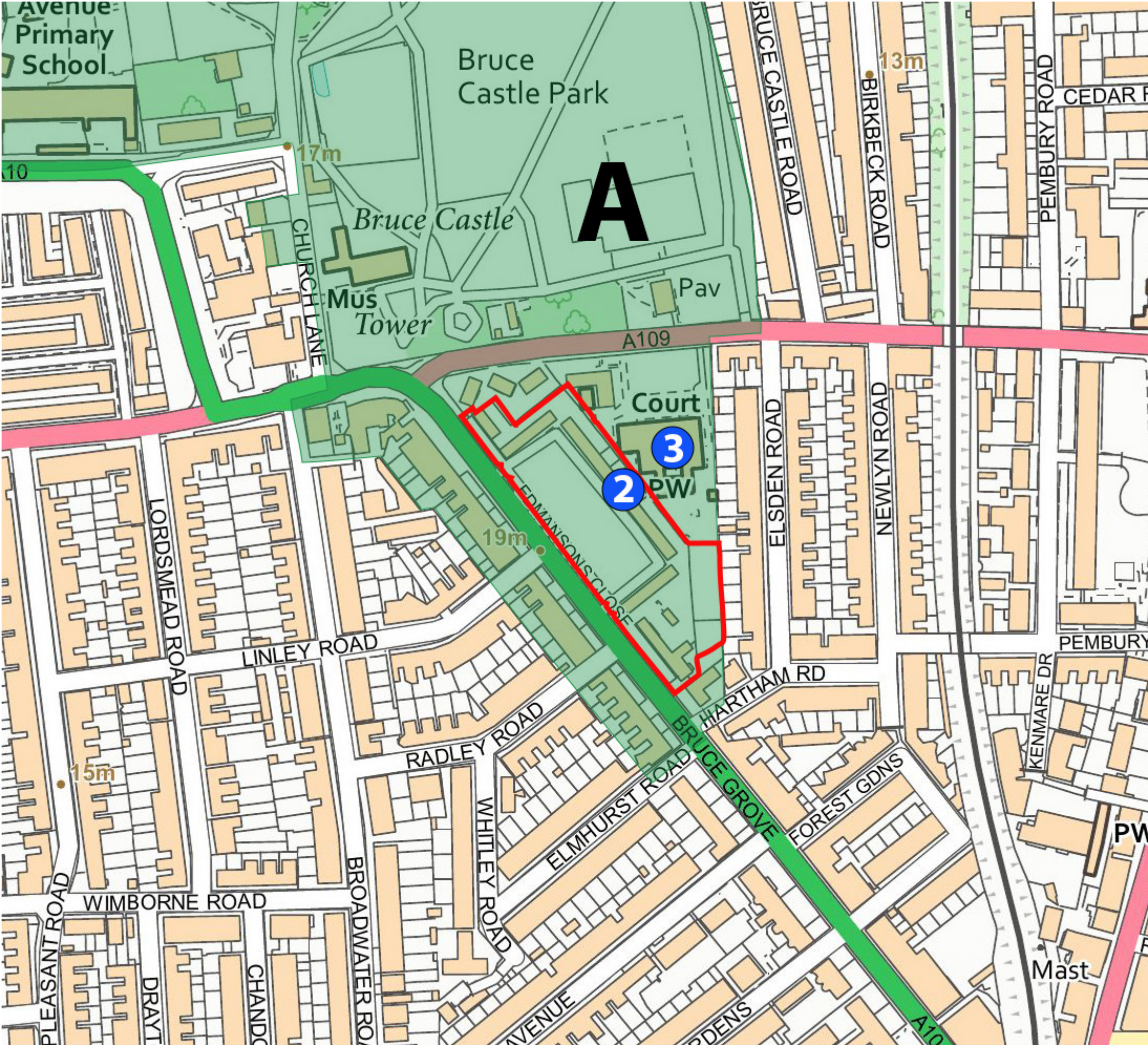
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1. Introduction

- 1.1 This Heritage Statement has been prepared by Smith Jenkins Heritage & Townscape on behalf of The Drapers' Almshouse Charity in support of the Proposals for Edmansons Close Almshouses, Tottenham, London.
- 1.2 The application site includes two listed building entries, comprising:
- the grade II listed Lodge/Gatehouse to the south east; and
 - the grade II Chapel and Drapers' Almshouses.
- 1.3 The site is also within the Bruce Castle Conservation Area and the Tottenham Magistrates Court, a separately grade II listed building, is to the east of the Site.
- 1.4 Paragraph 194 of the National Planning Policy Framework (NPPF) 2021 sets out the information requirements for determining applications and states that:
- 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.¹*
- 1.5 In response to the NPPF, section 2 of this report identifies the heritage assets which may be affected by the application proposals. Section 3 provides proportionate statements of significance for the heritage assets identified. These are relative to the scale, nature and effect of the proposals.
- 1.6 Section 4 provides an assessment of the application proposals on the significance of the identified heritage asset based on national, regional and local planning guidance. The Heritage Planning Policy context for the consideration of these proposals is set out in Appendix A. This includes the statutory duties (as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, regional and local planning policy.

¹ NPPF (2021)



Bruce Grove

Heritage Asset Plan

Key	Name	Grade
1	Lodge/Gatehouse to South East of Drapers' Almshouses	II
2	Chapel at Drapers' Almshouses, The Drapers' Almshouses	II
3	Tottenham Magistrates Court	II
A	Bruce Castle Conservation Area	N/A

Not to scale

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2. The Heritage Assets

2.1 A heritage asset is defined by the NPPF as:

*‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)’.*¹

Designated Heritage Assets

2.2 A Designated Heritage Asset is described by the NPPF (2021) as:

*‘A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation’.*²

2.3 Such assets are statutorily identified as having a level of heritage (architectural and/or historic) interest to justify designation. There are then particular procedures in planning decisions to ensure that their special interest is preserved or enhanced.

Listed Buildings

2.4 The application site includes two listed buildings entries, comprising:

- the grade II listed Lodge/Gatehouse to the south east; and
- the grade II Chapel and Drapers’ Almshouses.

Lodge/Gatehouse to South East of Drapers’ Almshouses (grade II)

2.5 The Lodge/Gatehouse to the south east of the Drapers’ Almshouses was added to the list of buildings of special architectural or historic interest on 24th May 1971. The list description for the building states:

“The Lodge; gabled, detached cottage similar in character to the almshouses”

Chapel at Draper’s Almshouses, The Drapers Almshouses (grade II)

2.6 The Chapel and the Drapers’ Almshouses were added to the list of buildings of special architectural and historic interest on 24th May 1971 at grade II. The listing not only covers the central Chapel but also the residential buildings which form part of an open quad. The

list description states:

“Circa 1870, formerly the Sailmaker's Almshouses. The buildings form 3 sides of a courtyard with detached wings. 2 storey cottages with 1 window each. Slate roofs with ornamental cresting. Yellow stock brick with stone dressings, red brick eaves cornice and band at 1st floor level. Square-headed, recessed sash windows with stone heads and recessed brick aprons. 1st floor gabled dormer windows with brick relieving arches over head. Moulded brick chimneys. Each pair of houses share a wooden porch with a hipped roof. Gauged flat brick arches to recessed doorways with panelled doors. In centre of east side, gabled Gothic chapel with pointed traceried windows and stone 3 bay portico with pierced parapet over. Wooden bell turret with slated roof at apex of gable. Ornamental cast iron rainwater heads. The Drapers Almshouses and lodge form a group.”

Tottenham Magistrates Court (grade II)

2.7 The Tottenham Magistrates Court was added to the list of buildings of special architectural and historic interest at grade II on 20th July 2014. The list description states:

“Police Court, now Magistrates’ Court. Opened 1937 with minor late-C20 alterations. W.T. Curtis, Middlesex County Council architect. Brown and blue brick with rubbed red brick and stone dressings. Hipped tiled roofs. Neo-Georgian style. PLAN: Wide and shallow 2-storey-plus-attic front range, with single storey flanking wings; tall single storey court rooms behind this, and 2-storey-plus-attic wide and shallow range to rear; narrow link to late-C20 addition at rear, not of special interest in 2004.

EXTERIOR: Front range of 9 window bays, with lower 2 window bay wings. Windows are multi-pane casements, those to ground floor with continuous rubbed brick band under stone plat band; those to first floor under rubbed red brick flat arches and sides, then stone band then brick band below stone cornice. 3 small hipped dormers in steeply pitched hipped roof. Stone band continues to lower flanking wings, and with 1 window to left blocked late-C20. Stone advanced entrance portio with segmental hood on columns, and plaque of MCC arms with scales; stone dressings continues to central first floor window with scrolled surround. Side elevations to central courts range have taller windows under similar arches. Rear range similarly detailed to windows and arches, and with tall chimney stacks.

INTERIOR: Entrance vestibule pair of heavy panelled front doors that open fully into the wall, with matching inner pair of doors. Paired stairs to front with metal handrails, leading to former witness and

waiting rooms at upper levels (not inspected). Central entrance hall with later-C20 counters and minimal Deco detail to top of piers, flanked by Court 1 and Court 2. These courts have original English Oak fittings with blue leather upholstery including judge's bench at higher level, witness boxes, clerk's and solicitor's benches, and public seating to rear behind fence and gate; dock to side wall with late-C20 screen; high level windows above chevron relief band; royal arms. Court 3 smaller but with tall exterior windows, also with similar with original oak fittings and dock. Commemorative plaque to inner hall, where steps down to cells (not inspected) providing discrete direct access to courts. Justices' retiring room to rear range with boxed-in radiators, dado, and caretaker's accommodation above (not inspected). ADDITIONAL FEATURES: Front boundary is marked by a low brick wall and metal railings.

HISTORY: Opened February 1937 by Lord Chief Justice Hewart as Tottenham Police Court and re-named Magistrate's court after 1949. Built on the site of 'Elmslea', a girls orphanage supported by the Draper's Company. The contractor was James Steward & Sons, Ltd., and the furnishings were provided by Maurice Adams, Ltd. SOURCES: The Architect and Building News, 19 November 1937.

Listed as a well surviving suburban police court (now magistrates court) of 1937 designed by the noted Middlesex County Council architect's department, this under W.T. Curtis and in a dignified Neo-Georgian style also retaining the original oak fittings in the court rooms. Curtis' Harrow Magistrate's Court of 1931 is also listed at Grade II.”

Conservation Area

2.8 The application site is within the Bruce Castle Conservation Area which was first designated by the London Borough of Haringey in March 1976 and subsequently extended in July 1998 by consolidating the adjoining south east part of BrUce Grove into the original designation.

2.9 At the outset, it must be noted that the setting of conservation areas is not statutorily recognised and it is only the contribution that the surrounding area makes to the character or appearance of an area that should be considered.

2.10 The Council have adopted a Conservation Area Character Appraisal in support of the designation. This was approved and adopted by the Council in March 2009 and is therefore a material consideration in the determination of applications. The Bruce Grove Castle and All Hallows Management Plan has also been prepared by the Council, which was approved in July 2019.

¹ NPPF (2021) Annex 2: Glossary (p.67)

² NPPF (2021) Annex 2: Glossary (p.66)

2.11 Non-Designated Heritage Assets

2.12 The NPPF identifies that heritage assets not only includes those which are designated (often with statutory protection) but also those assets identified by the local planning authority which could include local listing or buildings of townscape merit. Any such designations, for the purposes of the NPPF, are considered to constitute non-designated heritage assets.

2.13 The Council maintain a list of buildings which it considers to be of local interest, which includes a number of buildings within the surrounding of the site. These will not be affected by the application proposals and are not considered any further in this report.

Key Heritage Considerations

2.14 In summary, the key heritage considerations in the determination of this application will therefore comprise:

- Direct effect on the separately grade II listed Lodge and Chapel and Almshouses; and
- Direct effect on the character and appearance of the Bruce Castle Conservation Area.
- The indirect effects on the grade II listed Tottenham Magistrates Court.



3. Historic Development

- 3.1 Given the close proximity of the heritage assets, the following section provides an overview of the historical development of the site with specific reference, where necessary, to each heritage asset. This has been informed by the adopted Conservation Area Appraisal.
- 3.2 The original manor of Tottenham was owned by Waltheof, Earl of Huntingdon, who married William the Conqueror's niece, Judith, following the Normal Conquest. The Manor remained in the ownership of the Scottish Royal Family until the end of the C13th. The lands were sequestered by Edward I following the rebellion led by Robert the Bruce (which had resulted in him becoming the King of Scotland. Parts of Bruce Castle (to the north of the application site) are said to remain from building constructed in the C16th and it is thought that both Henry VIII and Elizabeth I stayed at the house later in the C16th. At this time, much of the area covered by the conservation area was in agricultural use.
- 3.3 During the early C19th, Prospect Place was laid out to the north of the junction of Church Lane and Church Road before Tottenham Cemetery was established to the north of the Churchyard. The population of the area grew in the first half of the C19th as transportation improved. At this time, a number of large villas were erected on the western side of the newly laid out Bruce Grove and were occupied by a number of wealthy Quaker families.

- 3.4 In 1866, a bequest of £36,000, was made to the Drapers' Company in the will of Thomas Corney to establish a school for female orphans of 'respectable females'. The Company purchased a large house, Elmslea, in Tottenham which included 5 acres of surrounding land. The site is first shown on an Ordnance Survey plan dating from 1863 (figure 3.1).
- 3.5 Having lost three sets of almshouses in the East End, it was agreed to join with the other trustees of the almshouses charities to build a new group of almshouses to replace those in Bow. £3,000 was added to the money received from the sale of the land in Bow with £21,000 available to construct the new almshouses close to the school. A third of the land at Elmslea was allocated to the school with the remainder being used for the construction of 44 almshouses, chapel and detached lodge for the warden. The almshouses were built from 1868-69 facing the south-west boundary. Soon after, Bruce Grove, a wide paved thoroughfare was constructed replacing the original footpath leading to Elmslea.
- 3.6 The almshouses were designed by the Drapers' Company architect Herbert Williams in 1868. Williams had recently completed the design for the new Drapers' Hall in the City. Tenders were obtained at the end of 1868 for between £14,000 and £16,000, and building work started immediately. By the end of 1869 the buildings were complete and the first occupants were living in the almshouses.

Reputedly there were unexpected difficulties in providing proper foundations for the houses, which caused added expense and the total cost (including architect's fee) eventually rose to £17,291.

- 3.7 The almshouses were, as typical for their type, grouped round three-sides of a rectangular grass forecourt (see Figure 3.2). Nos. 1-12 formed the northern L-shaped block, Nos. 13-32 with the chapel at the centre run parallel to Bruce Grove and the southern L-shaped block contained Nos. 33-44. As originally constructed, each almshouse was split over ground and first floor levels with a living room, a wash-house, W.C and store on the ground floor and a bedroom above, accessed by a staircase off the living room. All the houses had their own gardens enclosed by wooden fencing and each pair had a wooden porch in front. They were built in yellow brick with stone dressings and were designed in the quasi-Gothic manner which was fashionable at the time. The properties were built as accommodation for married couples.
- 3.8 Further land was added to the site in 1868 through the purchase of a strip of land along the whole length of the eastern boundary which was intended to protect the almshouses from development on surrounding land. Throughout the late 19th and early 20th centuries the almshouses provided adequate and homely accommodation in Bruce Grove to the elderly, including a number of former sail makers and men associated with maritime industries



Figure 3.1 1863 Ordnance Survey Plan of Tottenham. Source: National Library of Scotland.



Figure 3.2 Drapers' Almshouses c. 1936. © Drapers' Company Archives.

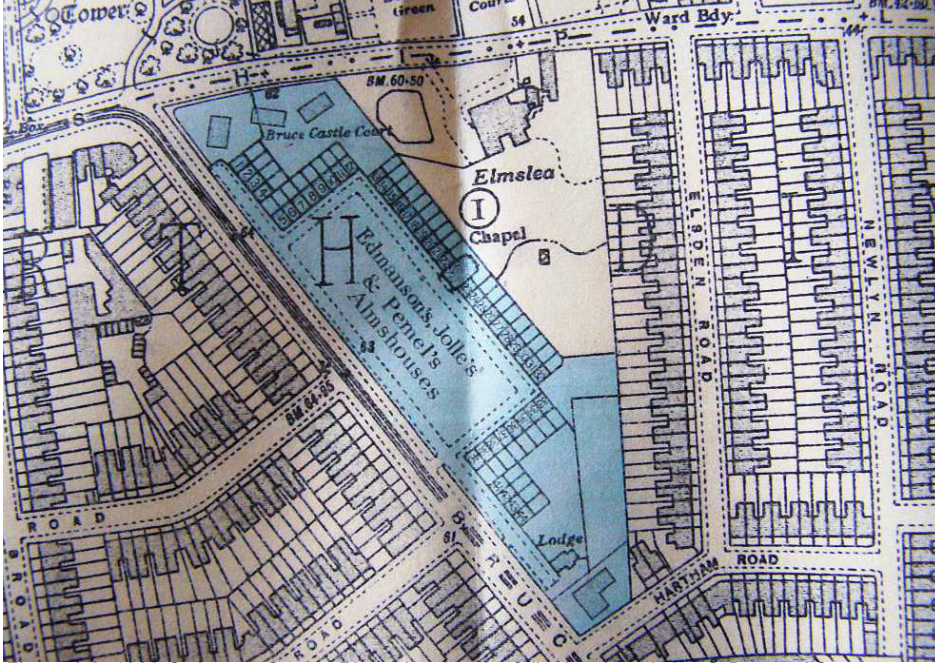


Figure 3.3 1939 Ordnance Survey Plan, showing the fully developed site. © Drapers' Company Archives.

and were sometimes known as the Sailmakers' Almshouses.

3.9 In 1872, the Great Eastern railway arrived within the area and Tottenham's population grew to 100,000 by 1891. There was a direct link to Liverpool Street with a station at Bruce Grove, providing easy access to the City. The introduction of affordable early morning tickets encouraged workers to commute into the City which led to the growth of the area with terraced housing to accommodate the lower middle classes and skilled workers.

3.10 Elmslea School was closed in 1932 and the property was sold to Middlesex County Council for conversion into a Metropolitan Police Court. In 1935 the Trustees of Tottenham District Nursing Association offered to purchase the southern corner plot on which they wished to build a Nurses' Home and in 1938 a local builder - Henry Smith – with agreement from the Drapers' Company constructed three small blocks of flats (later called Bruce Castle Court) to the north of the almshouses. The results of this change are shown on the 1939 Ordnance Survey Plan (figure 3.3). Major improvements were undertaken to the almshouses in the 1930s with much of the stonework replaced and brickwork repointed and chimney stacks rebuilt. All gutters were also replaced. Internally, the scullery floors were reconditioned. At the same time, electric lights were installed.

3.11 During the Second World War the almshouses were damaged several times by enemy action, but repairs were carried out where necessary and the residents stayed in their homes. The garden area in front of the almshouses was requisitioned by the Local Authority at this time with an air raid wardens post and shelters constructed. Part of the land was also used as allotments which remained until 1951.

3.12 In 1961, the Drapers' Company received an offer of £50,000 for the site for redevelopment. Whilst the offer was refused, as the almshouses by this time were considered to be old fashioned and causing the Drapers' Company a number of problems, this instigated the possible redevelopment of the site within the rationalisation of the almshouses onto a much smaller site.

3.13 Berry Webber & Partners were appointed by the Drapers' Company to prepare a scheme that would not only improve access for the inhabitants but also provide extra 'subsidised dwellings', which the Drapers' Company had already undertaken at Greenwich. Berry Webber had undertaken similar work for the Drapers' Company at Brandon Street in Southwark and also on the South Coast at Worthing. The proposal for Bruce Grove was to add an additional 80 units at a cost of £600,000 (£480,000 building costs and £120,000 for architect and quantity surveyors fees).

3.14 It was also intended to demolish the 1869 almshouses and rebuild them on the site. A planning application was made in 1971 to provide 122 flats, a garage and parking for 94 cars, a chapel and a matron's lodge. Whilst many local residents supported demolition, citing that the houses were outdated, the local press, the proposals were featured on the front page of the Enfield Weekly Herald, proclaiming that 'Charity wants to knock down historic Almshouses'. As a result of the threat to demolition, the Almshouses were grade II listed in June 1971.

3.15 The Drapers' Company decided appeal against the decision and at the planning appeal held in 1972, the Senior Surveyor to the Drapers' Company, Mr William Nevill stated that the:

'44 units, together with the Chapel and Matron's Lodge form 'The Bruce Grove Almshouses' have been for many years a source of considerable expense to the Company'.

3.16 He stated that the average sum spent during the years 1962/3 to 1970/71 on repairs and improvements was £2,910 per annum, while the annual income to the Trust that administered the almshouses was only £2,896. In effect the Drapers' Company was subsidising the almshouses. There were also problems with heating – gas fires had been installed earlier in the 20th century, but by 1970 the almshouses were heated by electricity apart from in the kitchens where paraffin was used. Nevill concluded that the houses caused continual trouble but admitted that he could not say that the houses were structurally unsound. He concluded that the almshouses 'apart from having no artistic merit, are thoroughly outdated'

3.17 After 1973 the Drapers' Company abandoned any further action on the redevelopment of the Bruce Grove Almshouses and the site. By 1977 plans for a major refurbishment of the properties was underway. By the end of 1975 plans for one and two person flats had been drawn up by Berry Webber & Partners, Architects to add extra accommodation in the vacant ground between the Matron's Lodge and the existing almshouses (see figure 3.2) Between 1978 and 1981 the Victorian almshouses were modernised and additional accommodation provided in these new infill units (figures 3.4 & 3.5). In March 1982 the Almshouses were blessed and re-opened in a grand ceremony (figure 3.4).

3.18 Since the 1980s the Bruce Grove Almshouses (by then known as Edmansons Close) have been further modernised and repaired on a number of occasions, including having a Warden Call System introduced. During the 1990s, in an attempt to resolve some of the inherent problems of the almshouses, there were many failed attempts of redevelopment and extension although none came to fruition.



Figure 3.4 New infill between the Matron's Lodge and main Almshouse blocks designed by Berry Webber & Partners, architects and built 1978-1981. © Drapers' Company Archives.

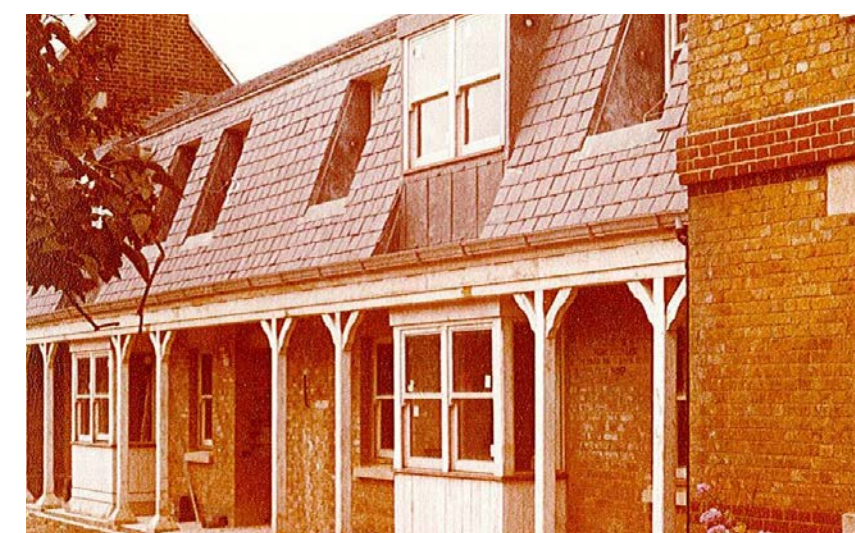


Figure 3.5 New infill between the Matron's Lodge and main Almshouse blocks designed by Berry Webber & Partners, architects and built 1978-1981. © Drapers' Company Archives.

4. Significance

- 4.1 The significance of a heritage asset is defined within the glossary to the NPPF as:

‘The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’

- 4.2 Listed buildings are a statutorily designated and, for the purposes of the NPPF, are designated heritage assets. Recognising this statutory designation, buildings hold special architectural or historic interest. The Department for Culture, Media and Sport publish the ‘Principles of Selection for Listed Buildings (2010)’ which is supported by thematic papers, ‘Listing Selection Guides’, based on building type, which give more detailed guidance.

- 4.3 Conservation Areas are identified if they are of special architectural or historic interest, the character or appearance of which should be preserved or enhanced. Historic England has published guidance on the designation of Conservation Areas which provides a framework for identification of those features that form the character and appearance.

- 4.4 Historic England has published ‘Conservation Principles, Policies and Guidance’ (2008) which identifies four types of heritage value that a heritage asset (whether it be designated or non-designated) may hold – aesthetic, communal, evidential or historic interest. Historic England has also published a Good Practice Advice Note on the ‘Setting of Heritage Assets’ (2015) which is used to understand the surroundings of a heritage asset which may contribute to the significance of a heritage asset.

Assessment

- 4.5 The following statements of significance provide an overview of the identified designated and non-designated heritage assets set out in section 2 which may be affected by the application proposals. These are proportionate to the importance of the asset and also the likely impacts of the proposals.

Listed Buildings

- 4.6 The Drapers’ Almshouses, as a group, are described by Pevsner in his Buildings of England series (London North, p. 588) as:

“...a combination of three City foundations moved out to the countryside. 1868-9 by the company’s architect, Herbert Williams. Spaciously laid out on three sides of a garden, with a central chapel with plate tracery window and angled fleche. Two storey cottages in minimal Gothic, with red and black brick window arches, gabled dormers and pretty pairs of wooden porches.”

Lodge to South East of Drapers' Almshouses (grade II)

4.7 The grade II listed Lodge to the south east of the Drapers Almshouses comprises a two storey gabled detached cottage which was originally used by the warden of almshouses. As originally constructed, the building was detached (figure 3.3) but a new building was constructed between 1978 and 1981 which filled in the gap between the lodge and the almshouses to the extent that it now reads as the bookend to the almshouses.

4.8 Figure 3.7 is a photograph of the Lodge as found today, showing the late C20th addition to the left hand side of the photograph. The architectural interest of the Lodge is derived from its appearance, which has group value with the wider Almshouses with which it forms a coherent group of inter-related buildings which show a similarity of style and appearance, being designed by the same architect and using the same materials.

4.9 To Bruce Grove, there is a gable ended with two bays at ground and first floor with the original sash windows replaced. There are red brick string courses at ground and first floor levels which continue around the building and are visible on all sides. There is a polychromatic window arch above the first floor windows with brick infill.

4.10 To the right hand side of the building (when viewing from Bruce Grove), there is a small one and a half storey extension (which houses the ground to first floor stair) with the entrance door (the timber door is later) set within a small porch and at a 45 degree angle. This is set behind a small column with a Corinthian capital which mirrors that on the front portico of the Almshouse Chapel. Above this there is a lamp bracket which has lost its lamp, although a gas supply line still runs to it. There is a small lean to extension of limited interest to the rear.

4.11 Internally, the Lodge has been subject to significant change through ongoing periods of refurbishment and, as such, whilst the plan form of the building remains the interior only makes a limited contribution to its significance instead relying on its external appearance and the associative attributes with the other listed buildings with which it forms a group.

4.12 The design of the 1970s' extension to the north west of the Lodge is influenced by the lodge and the surrounding almshouses and it sits comfortably alongside the listed building. It does, however, affect the ability to appreciate the listed building and, importantly, changes the character of the Lodge from a stand alone building to one that appears to form the 'bookend' to a long terraced building, affecting the way that the building is experienced. The Lodge is located at the southern entrance to the Almshouses and is experienced as part of an urban townscape set behind a small

area of hard surface with a mature planted boundary limiting views from the public highway.

4.13 In summary, the significance of the Lodge is derived from its associations with Herbert Williams, the architect to the Drapers Company who designed it along with the wider Almshouse grouping with which it has strong group value. The setting of the listed building has been subject to alteration through the construction of the link building between the lodge and the almshouse which has changed the experience of the asset from a detached dwelling to the 'bookend' to the wider terrace. Internally, the original plan form of the building remains discernible albeit that it has been subject to subsequent periods of refurbishment to the extent that the interior makes a limited contribution to the significance of the listed building.



Figure 4.1. The Lodge at the entrance to the site.

Chapel at Draper's Almshouses, The Drapers Almshouses (grade II)

- 4.14 The Chapel of the Drapers' Almshouse forms the central element in the wider grouping, with the listing covering the two wings to the north and south of the chapel but also the terrace of properties which enclose the gardens to the north and south as well as the smaller wings fronting onto Bruce Grove. These are a coherent group of related buildings which have strong associative attributes and, through shared materials and appearance, have a strong group value.
- 4.15 The Chapel to the Drapers' Almshouses forms the focus of the open quad arrangement of buildings with a gable end fronting onto the gardens with two large windows allowing light into the small nave. Facing onto the gardens, the Chapel has a small stone portico with a single arch on the end elevations and three arches facing the garden, with small Corinthian capitals (similar to that on the Lodge building to the South). The roof is surmounted by an angled fleche. The roof has been replaced, albeit using slates which are likely to be of a similar appearance to those removed.
- 4.16 Internally, the Chapel is a single double height open space albeit that a mezzanine floor has been inserted with a screen for use independent of the chapel itself. A folding screen has also been inserted underneath the mezzanine floor to allow the further subdivision of the space. These features detract from the open nature of the nave, but are fully reversible. The eastern wall of the Chapel features a large high level stained glass with four relief panels underneath. The chairs and other fittings are wholly modern. It is also worth noting that the addition of the rear extensions to the Chapel are modern and are of a poor quality and out of character with the rest of the site.
- 4.17 The terraced properties which extend to the north and south of the Chapel and which form the other sides to the open quad arrangement share a consistency of materials and appearance with their homogeneity and consistency making a significant contribution to shared value.
- 4.18 The architectural interest of the terraced houses is derived from this external appearance and the consistency of appearance and materials. Each property is two bays wide with, at ground floor, a doorway (with modern timber door) located alongside the neighbouring properties so that there is a shared wooden and slate porch. These are accessed from the side with a small area of garden in front of each house. At first floor, there is a single window directly above that at ground floor with a small gable with stone band and polychromatic brickwork band above. A chimney identifies the location of the party wall. The front elevation is constructed in London stock brick.

- 4.19 Through successive periods of refurbishment, the exterior of the buildings have been subject to change with wholesale replacement of the roof, rainwater goods and front doors of each property. Notwithstanding this, the original character and design intent of the buildings remain evident and the repeating external appearance is of strong group value.
- 4.20 To the rear, there is a single storey extension but it is of a more utilitarian appearance, being constructed in brown brick, in stark contrast to the distinctive London stock brick of the front elevation.
- 4.21 Internally, the terraced properties were originally designed as small houses, with living accommodation (kitchen, toilet and living room) at ground floor with a single bedroom at first floor. The properties have been subject to successive periods of refurbishment and are currently laid as primarily studio flats and some two bed flats set over a single floor, with central staircases to allow access to the flats at first floor. As a result of these changes, the interior of the terraced houses make a limited contribution to significance and bear little, if any resemblance to the original design intent.
- 4.22 The immediate setting of the chapel and almshouses consists of a central landscaped area, comprising a manicured lawn with a number of established trees arranged in a regular pattern of rows. Of particular note are the two rows that sit either side of the chapel's entrance, and serve to frame the chapel when looking from the road. This can be seen in the photograph of figure 3.6 and 3.9. This corridor of trees emphasise the chapel's role as the central feature of Bruce Grove. The large front lawn also features a number of benches which contribute to the close's sense of community, with smaller lawns located to the rear of the northern and southern almshouse terraces also containing benches (see figure 3.6) which affirm the intent of the development.
- 4.23 The trees and benches within the landscaped spaces were not parts of the initial development, as they are not seen in photographs of the early-mid-20th century (figure 3.2). However, these features were certainly in place by the 1980s reopening of the Drapers' Almshouses, where photographs (figure 3.6) and these certainly contribute to the significance of the heritage assets that reside within Bruce Grove.
- 4.24 The heritage asset is experienced as part of a wider townscape, with the gardens providing a large open space in an otherwise busy built environment. The almshouses now form part of a mixed townscape with the construction of Bruce Castle House and Tottenham Magistrates Court immediately surrounding the site.
- 4.25 In summary, the significance of the listed building (comprising



Figure 4.2. View of the Chapel and residential terraces.



Figure 4.3. View of almshouses fronting onto gardens.



Figure 4.4. Rear elevation of almshouses.

the Chapel and the almshouses) is derived from not only their association with the Drapers' Company Architect, Herbert Williams, but also in their strong associative attributes with a consistency and homogeneity of appearance through materials. Whilst successive periods of refurbishment have replaced the roof and rainwater goods, the original design intent remains discernible. The interior of the listed buildings does not, in the case of the terraced properties, contribute to special interest as a result of significant change. The interior of the Chapel retains some of its original appearance and makes a limited contribution to significance.



Figure 4.5. Looking through the corridor of trees towards the Chapel from the road.

Tottenham Magistrates Court (grade II)

4.26 The significance of the Tottenham Magistrates Court is summarised in the list description as:

“Listed as a well surviving suburban police court (now magistrates court) of 1937 designed by the noted Middlesex County Council architect’s department, this under W.T. Curtis and in a dignified Neo-Georgian style also retaining the original oak fittings in the court rooms. Curtis’ Harrow Magistrate’s Court of 1931 is also listed at Grade II.”



Figure 4.6. Tottenham Magistrates Court.

Bruce Castle Conservation Area

4.27 In support of the designation of the conservation area, the Council have prepared a Character Appraisal which sets out the historic development and the character and appearance of the area. The following assessment is taken from that document. The character appraisal identifies a number of sub-areas within the conservation area with the application site falling within sub-area 4 (Lordship Lane and Bruce Grove) which identifies the key characteristics as follows:

- Relatively varied in character and larger than the other sub-areas;
- Centres on Bruce Grove, part of the busy A10 trunk road which follows the route of a former avenue leading to Bruce Castle from Tottenham High Road, and includes part of Lordship Lane;
- The northern section of Bruce Grove is lined with residential dwellings of varying origin and appearance. Further south, towards the High Road, Bruce Grove is fronted by large villas which include ground floor commercial units of varied appearance;
- Northern section of Bruce Grove is lined with Edwardian terraces on the west side and the Drapers’ Almshouses on the east. The green space in front of the almshouses provides the northern section of the street with a sense of spaciousness;
- The southern end of the street, in contrast, has a more diverse urban character with increasing commercial activity and the elevated railway line having a significant influence on the area;
- Of the surrounding properties, the Nurses Home at no. 68E Bruce Grove, is considered to have a detrimental impact on the streetscene, whilst properties on the west side (including nos. 38 to 41, 46 to 54 and 57 to 67) are locally listed buildings of merit;
- Bruce Castle Court, to the north of the site, have also been identified as buildings of local interest.



5. Assessment of Application Proposals

5.1 The application proposals comprise:

“Demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing Gatehouse to provide 1 x 2 bed unit; construction of 1 x new build 3 bed almshouse to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units ; construction of 4 x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscaping; improvements to access; car parking; and ancillary development thereto.”

Assessment of Proposals

5.2 The proposals consist of a number of different components, firstly the works to the listed buildings themselves which involves works to the interior of the properties as well as extensions to some of the listed buildings to the rear.

5.3 Secondly, there are the new building elements, comprising the corner pavilions, the residential block on the site of the existing laundry building and the replacement almshouse style building in place of the addition between the almshouses and the grade II listed lodge.

Principle of Development

5.4 At the outset, it must be noted that the proposals are promoted by the Drapers Almshouse Charity, a charity that seeks to reinvest the profits made from its property portfolio into the company with a strong charitable ethos. In this case, new accommodation will be provided on the Edmansons Close site to maintain the existing community on the site, providing facilities which meet 21st century standards but also deliver further housing. In respect of the listed buildings, similar works were proposed and approved by the local planning authority in October 2016 which sought to amalgamate units as well as the comprehensive refurbishment to provide improved accommodation which is fit for modern living standards as the existing properties are generally sub standard and do not meet modern day residential living standards, irrespective of the listed status of the buildings.

Extent of demolition proposed

5.5 The proposals include the demolition of the existing residential link block between the almshouses and the grade II listed buildings to the south west of the site. These were developed in the 1970s and whilst they may share a broad sense commonality of materials

and broad appearance with the heritage elements of the site, they are later elements and are not included within the listing of the buildings within the wider close. The 1970s extension block is in a poor structural condition having suffered ground movement with inadequate foundations.

5.6 Subject to the detailed design of the application proposals, there is no reason why these buildings cannot be removed and replaced with a high-quality designed scheme that responds to the surrounding context which includes listed buildings and the Bruce Castle Conservation Area. Importantly, there is also an option to reinstate the important gap between the almshouses and the lodge

and also reveal the gable end of the listed almshouses, restoring the same condition as can be found on the opposite side of the square.

5.7 The extent of demolition must therefore be accepted and consideration must pass to the design of the individual elements which is formed of three parts, firstly the extensions to the existing listed buildings, secondly, the new build to the south of the listed buildings and, thirdly, the infill elements on the corners of the listed buildings. We deal with these in turn.



Figure 5.7 View along the rear of the almshouses showing the paired two storey extensions and the changes to the rear.



Figure 5.2. View from Bruce Grove looking into the site.

In this view, the application proposals involve the demolition of the existing 1970s modern almshouse and allows for the uncovering of the end gable of the listed almshouse to the left hand side. This restores the original condition of the listed buildings and reflects the layout on the opposite side of the landscaped space. This better reveals the significance of the listed buildings. The new almshouse will be seen, and its design is clearly informed by the listed building, albeit being in a modern interpretation.

The design of the new almshouse uses materials which are sympathetic to the listed building, being a stock brick to match the existing almshouses with a string course above ground and first floor which reflects the red brick course on the almshouses. During design development, a number of different tones of brick were considered for this string course, and it was felt that a darker tone to the stock brick ensured that the building read as a coherent whole and did not over dominate the listed buildings.

By turning the new almshouse round by 90 degrees, there is a clear view to the new apartment building beyond, with a view towards the front door to ensure a legible pattern of movement around the site.

The works to the listed buildings

- 5.8 The works to the listed buildings comprise a number of different elements – a limited number being extended to the rear, some internal alterations as well as their general refurbishment to enhance their appearance.

The extensions

- 5.9 The design of the extensions has been informed by the host building, utilising a similar palette of materials to the existing buildings. These discrete alterations to the building, which would be invisible from within the landscaped space to the front of the buildings would allow the upgrading of the existing residential accommodation and also add to the residential mix of the proposals, allowing the listed buildings to be put into a beneficial use. The extension maintains a rear garden to the buildings, maintaining the sense of openness to the rear of the properties.
- 5.10 Only those residential properties either side of the chapel will be extended with a small extension to provide a much improved living space to meet modern space requirements. These extensions will be two storey and will be constructed in brick to match the existing listed building. The height of the extension will be kept below the ridge height of the listed building to ensure that they are not visible from within the landscaped area at the front of the property. With a pitched roof, the extensions will be seen as a harmonious addition to the listed building which will sympathetic to the significance of the buildings.
- 5.11 The changes to the rear of the properties is shown in figure 5.1 on the previous page, a view of the rear of the properties, looking towards the chapel. The positive refurbishment works are shown which help to reveal the significance of the listed buildings and show that the two storey extensions have been designed as an integral part of the listed buildings, which when compared to the other buildings will clearly be seen as modern additions. Here, it is also possible to see the changes to the rear landscaping which provide individual private gardens in place of the overgrown areas that exist today.
- 5.12 Part of the existing single storey extensions will be maintained, which will allow the original layout of the listed buildings to be appreciated. The design of the new windows/doors to the rear will respond to those on the host building.
- 5.13 It is therefore considered that the proposals for the extension of the properties to the rear will preserve the significance of the listed building and through the beneficial re-use of the existing buildings,

has the opportunity to better reveal, and therefore enhance the significance of the listed building through beneficial re-use which will ensure that the buildings will continue in a use that maintains its interest.

Internal works

- 5.14 The proposed internal works are consistent with those approved in October 2016, comprising the removal of a stair and the amalgamation of units to create 2/3 bedroom units. This will be achieved through the amalgamation of units to create larger units.
- 5.15 As set out in the assessment of significance, the interior of the almshouses is of limited value and has been accepted by the Council, through previous discussions, to make a limited contribution to the significance of the listed building. The removal of these interiors will preserve the significance of the listed buildings and there is an opportunity for the better revealing of significance through an appropriate refurbishment strategy which draws out those elements that make the most contribution to significance.

General refurbishment

- 5.16 The listed buildings require refurbishment as part of the investment into the site, addressing the current condition as well as seeking to reinstate the historic appearance. The approach to the site has always been to better reveal significance to make best use of the important heritage assets within the site. Elements such as the original timber sash windows will be repaired and repainted in a heritage colour, with secondary glazing installed behind to improve the environmental performance of the buildings.
- 5.17 In respect of environmental performance, during pre-application discussions, it was suggested that insulation should be installed to the interior of the properties to improve their thermal efficiency. Such an approach was tested but ultimately rejected as it would cover up historic detailing and harm the significance of the listed building.

The Chapel and Lodge

- 5.18 The Chapel and Lodge will be similarly refurbished following the approach taken to the other listed buildings.

Summary on listed buildings

- 5.19 The proposals have been informed by a detailed understanding of the listed buildings on the site and seek to better reveal significance through careful refurbishment. As a result of this approach, the proposals will, as a minimum, preserve the significance of the listed

buildings and have the opportunity to better reveal significance through a carefully managed series of works which enhance significance.

The new build elements***The new build to the south***

- 5.20 The demolition of the infill elements to the south of the listed buildings is accepted in principle and consideration must pass to the design of the replacement building and how this responds to the underlying characteristics of the listed building and the conservation area.
- 5.21 The design of the new build elements to the rear have been informed by the appearance and design of the surrounding listed buildings. Facing Bruce Grove, the proposed development will create a brick wall with landscaping behind, allowing the listed buildings to stand in isolation more, restoring some of its original setting. This important gap between the almshouse and the lodge was filled in as part of the 1970s works, and the loss of the existing building will reinstate the historic appearance of the almshouse, where the gable ends form a stop to built development. Reinstating this gable end will better reveal and enhance significance. There will be a need for some refurbishment of this end elevation following demolition, and those precise works will be determined when the condition of the end wall has been revealed.
- 5.22 The replacement building, angled to create a key route to the rear of the site is a modern interpretation of the historic appearance of an almshouse. The principles of width and height is determined by following the broad appearance of the listed buildings, with the ridge height being consistent with those surrounding. The modern approach to the almshouse.
- 5.23 The accurate visual representation in figure 5.2 shows the view from Bruce Grove into the site, albeit with the boundary vegetation removed to help understand the proposals. This shows the change that will take place with the removal of the modern almshouse and how this allows for the better revealing of significance through the opening up of the gable end wall of the listed almshouse. By rotating the new almshouse by 90 degrees, this allows the key view to the entrance of the apartment to be opened up.
- 5.24 In this view, the new almshouse is clearly a modern addition to the site, the design of which has been informed by the appearance of the listed building. As a result, the new intervention is a carefully crafted piece of design which reinforces the heritage values of the site and better reveals significance.



Figure 5.3. View across the landscaped space to the front of the almshouses looking towards the location of the apartment building.

This is a key view looking across one of the key elements of the immediate setting of the listed buildings, forming part of how the heritage assets are experienced. As the wireline shows (with the trees removed to show maximum visibility) the apartment building would be wholly obscured from view and would not break the ridge line of the almshouse which would remain intact. The corner pavilions will be glimpsed in the view and would be subservient to the listed buildings.



Figure 5.4. View of the rear of the almshouses and the relation to the new apartment building.

This key view shows the relationship of the apartment building to the rear of the almshouses. The approach to integrating new buildings on the site continues, ensuring that the modern elements can be easily appreciated. The design influences are appreciable, being the brick colour as well as string courses.

The new residential building

- 5.25 The application proposals introduce new buildings on the site of the existing laundry (a modern single storey building of limited significance). The layout of the proposed apartment building has been informed by the surrounding trees and the structured layout of the rest of the site, being an organised and rigid layout. The height of the proposals has been fixed to ensure that the apartment building will not be visible above the ridge line of the almshouses when viewed from the opposite side of the landscaped space in front of the almshouses. This is confirmed in figure 5.3 which provides an accurate visual representation of the proposals where the development is indicated in a wireline. This shows that the proposals will be wholly obscured from view.
- 5.26 Through the removal of the modern 1970s almshouses and their replacement with an almshouse set at a right angle, allows a key view and access opened up to the land to the rear which will allow the new apartment building to be properly incorporated into the site. This area has always appeared somewhat as a left over space, being a irregular shaped space with a rigid layout of buildings imposed on it. This approach allows for the site to be better used whilst maintaining and enhancing the fundamental heritage significance of the site.



Figure 5.5. View from the roadway looking along the Almshouse towards the corner pavilions.

The corner pavilions will be seen from a very small part of the landscaped space at the front of the almshouses. The proposal pavilions are intended to be subsidiary to the almshouses albeit clearly being informed by the surrounding listed buildings. The pavilions follow the overall approach to the site where there is a commonality of architectural language across the new build elements which ensures that they can be seen as modern additions to the site.

Whilst the corner pavilions would be visible, this will only be to ensure that the site remains legible and there is clear wayfinding to the corner blocks.

- 5.27 The modern buildings will include high quality materials which have been outlined in the Architect's Initial Design Proposals and which will ensure that the new elements remain in deference to the listed buildings but are also high quality interventions into the conservation area. Figure 5.4 shows the apartment building in the context of the rear of the almshouses to the south of the site. In the view, the positive change that takes place to the rear of the almshouses is visible, and the design of the apartment building can be appreciated. In such views, there is a clear intent to be informed by the listed buildings, with the string course above ground, first and second floor, as well as the openings, the proportions of which have been informed by the listed buildings. The apartment building will be a high quality addition to the site and would preserve the significance of the listed buildings and the character and appearance of the conservation area.

The corner pavilions

- 5.28 The corner pavilions are the final element of the proposed development. These continue with the subtle response to the underlying heritage values of the site, using the listed buildings to inform appearance, but doing so in a modern manner. As figure 5.5 shows, the corner pavilions will not be visible from large parts of the landscaped area in front of the listed building, and will only be

glimpsed in views. Where they are seen, they will be seen in the context of the listed buildings, being in a similar brick whilst also using strong courses to ensure that the design is informed by the listed buildings. The height of the pavilions has been kept below the height of the almshouses, which will remain as the dominant elements in views from the surrounding area.

- 5.29 As such, the proposals will preserve the significance of the listed building and the character and appearance of the conservation area.

Considerations against Legislation and Policy

Statutory Duties

- 5.30 The Planning (Listed Buildings and Conservation Areas) Act 1990 places duty upon the decision maker in determining applications for planning permission to have special regard to the desirability of preserving the character and appearance of conservation areas.
- 5.31 This statement has identified the significance of the designated heritage assets which could be affected by the application proposals and concludes that the proposals will preserve the significance of the listed buildings and the conservation area and there is an opportunity for the better revealing of significance through a carefully designed scheme that builds upon the heritage significance of the site. The proposals are therefore wholly in accordance with the statutory duty.

NPPF (2021)

- 5.32 The significance of the heritage assets (both designated and non-designated), as required by paragraph 194 of the NPPF, has been set out in Section 3 of this report. In accordance with paragraph 197 of the NPPF, the application proposals will conserve the significance of the listed buildings and the conservation area.
- 5.33 The conservation of heritage assets has, in line with paragraph 199 of the NPPF, been given great weight and provides an opportunity for new development to better reveal the significance of the surrounding heritage assets (paragraph 206). According, the application proposals are in accordance with the NPPF.

London Plan (2021)

- 5.34 This report has demonstrated that the application proposals have sought to optimise the site capacity through a design-led approach, based on a comprehensive understanding of the surrounding heritage and townscape sensitivities. It has also assessed the visual impacts of the proposed development on these identified

heritage and townscape receptors, taking account of and avoiding any harm to the significance of the identified heritage assets and their settings. The proposals will conserve the significance of the identified heritage asset and are therefore in full accordance with the heritage policies of the newly adopted London Plan 2021.

Local Policy

- 5.35 As demonstrated in this Statement, the proposals will, as a minimum preserve the significance of the listed building and the character and appearance of the conservation area. The proposals are therefore wholly in accordance with the heritage policies of the Local Plan.

6. Conclusions

- 6.1 The application proposals involve direct change to the listed buildings within the site, comprising the separately listed grade II Lodge/Gatehouse and the grade II listed Chapel and Almshouses. These proposals have been developed over a number of years, dating back to the October 2016 approval which allowed for the substantial alteration of the interiors of the Almshouses to provide improved residential accommodation. These latest proposals are a further refinement of those earlier proposals and have been subject to pre-application discussion for a number of years. This has included presentations to the Council's Quality Review Panel on several occasions.
- 6.2 The proposals have been informed by a detailed understanding of the significance of the heritage assets that have the potential to be affected by the proposals. This is limited to the listed buildings (two listed building entries) within the site and the Bruce Grove Conservation Area within which the site is located.
- 6.3 The proposals involve the refurbishment of the listed buildings which includes rear extensions and internal alterations to provide enhanced residential development for the site. The important element here is that the greatest degree of change, being the extensions to the rear, would not effect the key element of significance of the almshouses, being their appearance from the landscaped area in front of the almshouses. It is this that makes the greatest contribution to significance, being the consistent appearance and use of materials. To these front elevations, the proposals involve the refurbishment of the listed buildings which will improve and better reveal their significance.
- 6.4 The modern additions to the site include the corner pavilions, apartment block and new almshouse (in place of the 1970s modern almshouse). These additions have all been designed to be clearly read as new additions to the site, with a commonality of appearance and materials, informed by the historic significance of the site.
- 6.5 The corner pavilions have been designed as discrete elements which would only be glimpsed from the landscaped area in front of the site. These would build upon the historic significance of the site whilst also adding to the residential mix of the site.
- 6.6 The new almshouse replaces an early 1970s almshouse (which was added with limited respect for the significance of the site). The new building is rotated through 90 degrees to improve the legibility of the new apartment building behind. This new apartment building would be obscured from view from the landscaped space in front of the almshouses and would therefore not affect the significance of this area.
- 6.7 Overall, the proposals offer an opportunity to better reveal the significance of the listed buildings through a careful package of works which will restore and refurbish key elements of interest, particularly when viewed from the landscaped space to the front. The new additions to the site have been carefully considered and have a commonality of architectural languages which has been informed by the significance of the site.
- 6.8 The proposals are therefore considered to be in accordance with heritage planning policy, comprising the NPPF and the development plan.

Appendix A: Heritage Planning Policy Context

Legislation

Planning (Listed Building and Conservation Areas) Act 1990

Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from Section 16 of the 1990 Act which states that in considering applications for listed building consent, the local planning authority shall have special regard to the desirability of preserving the Listed Building or its setting or any features of special architectural or historic interest which it possesses.

Section 66 further states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

According to Section 69 of the Act a Conservation Area is an “area of special architectural or historic interest the character and the appearance of which is desirable to preserve or enhance”. It is the duty of Local Authorities to designate such areas and to use their legal powers to safeguard and enhance the special qualities of these areas within the framework of controlled and positive management of change.

Section 69 further states that it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly. Adding, The Secretary of State may from time to time determine that any part of a local planning authority's area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

Further to this Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard to the desirability of preserving or enhancing the character and appearance of Conservation Areas. Further provisions are detailed in Section 74 of the Act.

Recent case law¹ has confirmed that Parliament’s intention in enacting Section 66 (1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means “to do no harm”. This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against

¹ Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) Historic England (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014

public benefits as required by national planning policy. This can also logically be applied to the statutory tests in respect of conservation areas. Similarly, it has also been proven that weight must also be given to heritage benefits.

National Planning Policy

National Planning Policy Framework (NPPF) July 2021

The National Planning Policy Framework (NPPF) was published on 20th of July 2021 and sets out the Government’s planning policies for England and how these are expected to be applied. It has purposefully been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.

When determining Planning Applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the ‘golden thread’ which is expected to run through the plan-making and decision-taking activities. It should be noted however, that this is expected to apply except where this conflicts with other policies combined within the NPPF, inclusive of those covering the protection of designated heritage assets , as set out in paragraph 11 of the NPPF.

Within section 12 of the NPPF, ‘Achieving well-designed places’, Paragraphs 126 to 136, reinforce the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high-quality places. This section of the NPPF affirms the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, reflecting the built identity of the surrounding area.

Section 16, ‘Conserving and Enhancing the Historic Environment’, Paragraphs 189-208, relate to developments that have an effect upon the historic environment. These paragraphs provide the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their Local Plans. This should be a positive strategy for the conservation and enjoyment of the historic environment and should include heritage assets which are most at risk through neglect, decay or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance .

The NPPF advises local authorities to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment. These considerations should be taken into account when determining planning applications:

- The desirability of sustaining and enhancing the significance of

heritage assets and preserving them in a viable use consistent with their conservation;

- The wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;
- The desirability of new development in making a positive contribution to local character and distinctiveness;
- Opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 191 of the NPPF states 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 order to determine applications for development, Paragraph 194 of the NPPF states that LPAs should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting . Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.

According to Paragraph 195, LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

Paragraph 196 adds that where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.

Paragraphs 199 to 204 consider the impact of a proposed development upon the significance of a heritage asset . Paragraph 199 emphasises that when a new development is proposed, great weight should be given to the asset’s conservation and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.

Paragraph 202 advises that where a development will cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Paragraph 203 notes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. Adding, that in weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 204 stipulates that local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

In addition, Paragraph 206 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Adding, proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

Paragraph 207 importantly clarifies that not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Adding, loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The NPPF therefore continues the philosophy of that upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative and sustainable approaches to managing change. English Heritage (now Historic England) defined this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment.' (Constructive Conservation in Practice, English Heritage, 2009).

National Guidance

Planning Practice Guidance (NPPG) 2019

Planning Practice Guidance (PPG) was introduced by the Government as a web-based resource on 6th March 2014 and is updated regularly, with the most recent update on 23rd July 2019. The PPG is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.

It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also states, conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.

Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available.

Key elements of the guidance relate to assessing harm. It states, an important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Adding, it is the degree of harm, rather than the scale of development that is to be assessed. The level of 'substantial harm' is stated to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF.

Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

The PPG makes clear that the delivery of development within the setting of heritage assets has the potential to make a positive contribution to, or better reveal, the significance of that asset.

Finally, the PPG provides in depth guidance on the importance of World Heritage Sites, why they are importance and the contribution setting makes to their Outstanding Universal Value. The PPG also provides guidance on the approaches that should be taken to assess the impact of development on the Outstanding Universal Value of World Heritage Sites.

Historic England Guidance - Overview

On the 25th March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide. This document has been replaced with three Good Practice Advice in Planning Notes (GPAs), 'GPA1: Local Plan Making' (Published 25th March 2015), 'GPA2: Managing significance in Decision-Taking in the historic Environment' (Published 27th March 2015) and 'GPA3: The Setting of Heritage Assets (December 2017).

The GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on the how good practice can be achieved through the principles included within national policy and guidance. As such, the

GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

In addition to these documents, Historic England has published several core Advice Notes (HEAs) which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; 'HEAN1: Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)', 'HEAN2: Making Changes to Heritage Assets' (25th February 2016) and 'HEAN3: The Historic Environment and Site Allocations in Local Plans' (30th October 2015). In addition to these 'HEAN4: Tall Buildings' (December 2015), 'HEA:#N7: Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021), 'HEAN10: Listed Buildings and Curtilage' (21st February 2018) and, 'HEAN12: Statements of Heritage Significance' (October 2019). Collectively, these Advice Notes provide further information and guidance in respect of managing the historic environment and development within it.

Historic England Good Practice Advice Note 1 (GPA1): The Historic Environment in Local Plans (March 2015)

This document stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence in relation to the economic, social and environmental characteristics and prospects of an area, including the historic environment, as set out by the NPPF. The document provides advice on how information in respect of the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance). This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

Furthermore, the Local Plan can assist in ensuring that site allocations avoid harming the significance of heritage assets and their settings, whilst providing the opportunity to 'inform the nature of allocations so development responds and reflects local character'.

Further information is given relating to cumulative impact, 106 agreements, stating 'to support the delivery of the Plan's heritage strategy it may be considered appropriate to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk.' It also advises on how the heritage policies within Local Plans should identify areas that are appropriate for development as well as defining specific Development Management Policies for the historic environment. It also suggests that a heritage Supplementary Planning Document (SPD) can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.

Historic England Good Practice Advice Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-taking in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that ‘development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.’

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of development proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary. This document also

provides guidance in respect of neglect and unauthorised works.

Historic England Good Practice Advice Note (GPA3): The Setting of Heritage Assets (December 2017)

This is used to understand the surroundings of a heritage asset which may contribute to its significance. It aids practitioners with the implementation of national policies and guidance relating to the historic environment found within the NPPF and PPG, once again advocating a stepped approach to assessment.

It amalgamates ‘Seeing the History in the View’ (2011) and ‘Setting of Heritage Assets’ (2015) forming one succinct document which focuses on the management of change within the setting of heritage assets.

The guidance is largely a continuation of the philosophy and approach of the previous documents, albeit now with a greater emphasis on the contribution that views to and from heritage assets make to their significance. It reaffirms that setting should be understood as the way in which an asset is experienced.

The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors including noise, vibration and odour, while setting may also incorporate perceptual and associational attributes pertaining to the asset’s surroundings.

This document provides guidance on practical and proportionate decision making with regards to the management of proposed development and the setting of heritage assets. It identifies that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, as well as further weighing up the potential public benefits associated with the proposals. It clarifies that changes within the setting of a heritage asset may have positive or neutral effects.

It highlights that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting and that different heritage assets may have different abilities to accommodate change within their settings without harming the significance of the asset and therefore setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, noting that any approach should be demonstrably compliant with legislation, national policies and objectives, Historic England recommend using a ‘5-step process’ in order to assess the potential impact of a proposed development on the setting and significance of a heritage asset, with this 5-step process similar

to that utilised in earlier guidance:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Historic England Advice Note 1 (HEAN1): Conservation Area Appraisal, Designation and Management (Second Edition, February 2019)

First published by English Heritage March 2011 as: Understanding Place: Conservation Area Designation, Appraisal and Management and republished as Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1 2016, Historic England Advice Note 1 (HEA): Conservation Area Appraisal, Designation and Management (Second Edition, February 2019) continues to support the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management.

This second edition updates the advice in light of the publication of the 2018 National Planning Policy Framework and gives more information on the relationship with local and neighbourhood plans and policies. It is also re-ordered, to underline the staged approach to the appraisal, designation and management of conservation areas, while continuing to offer advice on managing conservation areas so that the potential of historic areas worthy of protection is fully realised. It has also been updated to give more information on innovative ways of handling conservation appraisals, particularly community involvement beyond consultation, character assessment and digital presentation.

This document identifies different types of special architectural and historic interest which contribute to the significance and character of a conservation area, leading to its designation. These include:

- Areas with a high number of nationally designated heritage assets and a variety of architectural styles and historic associations;
- Those linked to a particular industry or individual with a particular local interest;
- Where an earlier, historically significant, layout is visible in the modern street pattern; Where a particular style of architecture or traditional building materials predominate; and

- Areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of parks and gardens of special historic interest.

Change is inevitable, and often beneficial, and this document provides guidance in respect of managing change in a way that conserves and enhances conservation areas. It also identifies ways in which suitable areas can be identified for designation as new conservation areas or extensions to conservation areas through historic characterisation studies, production of neighbourhood plans, confirmation of special interest and setting out of recommendations.

Historic England Advice Note 2 (HEAN2): Making Changes to Heritage Assets (February 2016)

The purpose of this document is to provide information in respect of the repair, restoration and alterations to heritage assets. It promotes guidance for both LPAs, consultants, owners, applicants and other interested parties in order to promote well-informed and collaborative conservation.

The best way to conserve a building is to keep it in use, or to find an appropriate new use. This document states that ‘an unreasonable, inflexible approach will prevent action that could give a building new life...A reasonable proportionate approach to owners’ needs is therefore essential’. Whilst this is the case, the limits imposed by the significance of individual elements are an important consideration, especially when considering an asset’s compatibility with Building Regulations and the Equality Act. As such, it is good practice for LPAs to consider imaginative ways of avoiding such conflict.

This document provides information relating to proposed change to a heritage asset, which are characterised as:

- Repair;
- Restoration;
- Addition and alteration, either singly or in combination; and
- Works for research alone.

Historic England Advice Note 12 (HEA12): Statements of Heritage Significance (October 2019)

HEA12: Statements of Heritage Significance covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets.

The document states that understanding the significance of heritage assets, in

advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions. It explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

Conservation Principles, Policies and Guidance (English Heritage, 2008)

Conservation Principles outlines English Heritage’s approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in English Heritage’s own advice and guidance through the planning process, the document is commended to local authorities to ensure that all decisions about change affecting the historic environment are informed and sustainable.

This document was published in line with the philosophy of PPS5 and is currently in the process of being updated. Nevertheless, it remains relevant to the current policy regime in that emphasis is placed upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main ‘heritage values’ being: evidential, historical, aesthetic and communal. The Principles emphasise that ‘considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment’ (paragraph 25).

Strategic Policy

The London Plan 2021

The new London Plan was adopted in March 2021. The Plan forms part of the strategic Development Plan and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It replaces all previous versions of the London Plan.

The concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, underpins the new London Plan 2021, ensuring that it is focused on ‘sustainable development’ for future generations.

Policy D1 ‘London’s form, character and capacity for growth’ places a duty on the London Boroughs to define an area’s character at a local level in order to understand its capacity for growth. Policy D1 states that a Borough’s area assessment should cover the urban form and structure the area (for example the existing townscape qualities including building height and density), as well as the historical evolution and the identification of heritage assets, including an assessment of their significance and contribution to local character. Assessments should also identify important views and landmarks.

Policy D3 ‘Optimising site capacity through the design-led approach’ seeks every new development to make the most efficient use of land by optimising its

capacity, through a ‘design-led approach’. A design-led approach to optimising site capacity should be based on an evaluation of the site’s attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that specific site. Good design and good planning are intrinsically linked, with the form and character of London’s buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs of Londoners, be inclusive and make the best use of the finite supply of land. Development should be designed to respond to the special characteristics of its locality, which could include a predominant architectural styles/building material; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value. In specific regard to heritage, Policy D3 states development should ‘respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character’.

Chapter 7 of the Plan sets out the relevant policies concerning development within the historic environment, stating that the built environment, combined with its historic landscapes, provides a unique sense of place within the city, whilst layers of architectural history provide an environment that is of local, national and international value. The Plan seeks to identify and promote sensitive management of London’s heritage assets, in tandem with the promotion of the highest standards of architecture, maintaining the blend of old and new that contributes to the city’s unique character. Policy HC1: ‘Heritage conservation and growth’ states:

- A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:
 1. setting out a clear vision that recognises and embeds the role of heritage in place-making
 2. utilising the heritage significance of a site or area in the planning and design process
 3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place

4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
- C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Policy HC3 'Strategic and Local Views' concerns the protection of viewpoints within the city, recognising the significant contribution views make to the image and character of London at the strategic level, with the Mayor seeking to protect the composition and character of these views. Policy HC3 specifically states:

- A. Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.
- B. Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.
- C. The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important

Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.

- D. The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.
- E. The Mayor has prepared Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.
- F. Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.
- G. Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

Essentially the London Plan 2021 seeks to celebrate London's rich history, ensuring the character of an area underpins how it will grow and develop in the future. The Plan encourages the enhancement of the historic environment and looks favourably upon proposals which seek to maintain the significance and setting of the city's heritage assets.

Local Planning Policy

Haringey's Local Plan: Tottenham Area Action Plan (2017)

Objective 7: Enhancement of heritage assets

Tottenham has a number of significant heritage assets which are facing pressures from development, some of which are in poor and vulnerable condition, underused and facing an uncertain future. Heritage buildings, and the conservation area which lines the high street, are important markers of the past and are assets which add value to the character of the high street. Therefore, we will promote the enhancement of heritage assets through appropriate heritage led redevelopments as part of the overall regeneration of Tottenham to ensure these buildings are enhanced through new development. Conservation Areas will be actively managed, and regularly reviewed as regeneration progresses to ensure resources are effectively targeted in this area.

Policy AAP5: Conservation and Heritage

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:

- Reflect, where available and relevant, character and heritage appraisals, statements and management plans for the area and/or heritage assets;
- 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;
- Maximise opportunities for integrating heritage assets within new development and enhance connectivity between them;
- 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.

All development proposals should demonstrate an understanding of the local historic environment and clearly consider the proposal's physical and functional impact on this environment, as well as the wider area. The Council will seek to ensure that all proposals consider opportunities for adaptive re-use of existing assets, where viable, as well as the sensitive integration of new development within the existing urban and historic fabric.

In Tottenham, the historic environment forms an important part of the area's character and contributes to residents' sense of place and local identity. Continued economic deprivation of the area has led to some loss of architectural features and detailing that has compromised the significance of some assets. The above policy seeks to positively maximise the investment and regeneration opportunities in managing historic environment with particular emphasis on integrating assets with development schemes and bringing redundant buildings back into use. The policy recognises the need to balance continuity and the preservation of local distinctiveness and character with historic environments as active living spaces that respond to the needs of local communities.

All development proposals should demonstrate an understanding of the local historic environment and clearly consider the proposal's physical and functional impact on this environment, as well as the wider area. The requirements of AAP5 will be considered alongside Policy DM9.

Haringey Local Plan: Spatial Strategy (2013)

SP12: Conservation

- The Council shall ensure the conservation of the historic significance of Haringey's heritage assets, their setting, and the wider historic environment. The borough's heritage assets include Statutory Listed Buildings, Conservation Areas, Registered Parks and Gardens, Archaeological Priority Areas, and other locally important heritage assets such as Locally Listed Buildings, Local Historic Green Spaces and Sites of Industrial Heritage Interest. Where archaeological excavation is required, findings should be published, disseminated, and used as the basis for archaeological interpretation on site.
- The Historic Environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change. Where possible, development should help increase accessibility to the historic environment. All development shall protect the Strategic view from Alexandra Palace to St Paul's Cathedral as protected in the London Mayoral "London View Management Framework" Revised SPG, July 2010, and key local views.

Haringey Local Plan: Development Management DPD

Policy DM9: Management of the Historic Environment

Haringey's Heritage Assets

- Development that conserves and enhances the significance of a heritage asset and its setting will be supported.
- Proposals affecting a designated or nondesignated heritage asset and its setting will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance. Applicants are required to submit with their planning application a statement describing the significance of the heritage asset(s) concerned, including any contribution made by its setting, along with an assessment and justification of the impact of the new development on the asset and its setting.
- When considering the impact of proposals on the historic environment, the Council will have regard to:
 - o The priority given to sustaining and enhancing the significance of a heritage asset and its setting;
 - o Character appraisals and management plans or other guidance, where they are available;
 - o The preservation or reinstatement of original or historic form, fabric, function or character of the asset and its setting;
 - o The relationship with adjoining and neighbouring uses, particularly where

these are heritage assets of significance in their own right;

- o The desirability of securing a viable use for a heritage asset consistent with its conservation;
- o An understanding of and respect for significance of heritage assets as parts of measures to mitigate and adapt to climate change; and
- o The contribution that the sensitive utilisation of heritage assets can make to sustainable regeneration.

Conservation Areas

- Subject to (A-C) above the Council will give consideration to, and support where appropriate, proposals for the sensitive redevelopment of sites and buildings where these detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or complement the special characteristics and significance of the area.
- Proposals for alterations and extensions to existing buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive.

Listed and Locally Listed Buildings

- In addition to (A-C) above, the Council will seek opportunities to secure the future of listed buildings particularly those on the 'Heritage at Risk' register, provided they:
 - o Do not lead to substantial harm or total loss of their significance;
 - o Retain and repair existing features and fabric, or, if missing, replace them in a sympathetic manner;
 - o Do not harm the structural integrity or stability of the building or that of adjoining buildings or structures; and
 - o Extensions are restricted to less significant parts of the building, relate sensitively to the original building and do not adversely affect the internal or external appearance or character of the listed building, curtilage or its setting.
- Subject to (A-C) above, the Council will seek to protect the local distinctiveness of the Borough by sustaining and enhancing the significance of locally listed buildings.

3rd Floor
News Building
3 London Bridge Street
London
SE1 9SG

1st Floor
1 Canon Harnett Court
Wolverton Mill
Milton Keynes
MK12 5NF

www.smithjenkins.co.uk

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