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Your ref: PP-11862535 & PP-11862547
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London Borough of Haringey
Planning Services
6th Floor, River Park House
225 High Road
Wood Green
N2 8HQ

By Planning Portal, Reference **PP-11862535 & PP-11862547**

Dear Officers,

Application for Advertisement and Listed Building Consent

744-748, 790-802 & 808-812 High Road, Tottenham N17

On behalf of 'Paxton 17 Ltd' I have submitted applications for advertisement and listed building consent (LBC) in respect of proposed commemorative heritage plaques on several buildings at the High Road, Tottenham (collectively referred to as "the Site").

Advertisement Consent is sought for the following:

"Express advertisement consent for 1 non-illuminated fascia signs to No. 808 High Road and 1 non-illuminated fascia sign to 810/812 High Road."

LBC is sought for the following:

"Listed Building Consent to install non-illuminated fascia plaques to Nos. 744, 746, 748, 790, 792, 794, 796, 798, 800, 802, 808 and 810/812 High Road, comprising a total of 17 No. plaques."

Planning permission is not sought for the proposed plaques as their scale is limited and they do not materially affect the associated buildings. As a consequence, they do not comprise "development" for which planning consent is required. Agreement on this position is sought from the local planning authority for the avoidance of any doubt.

The following information is provided in support of both applications:

- This Cover Letter, outlining the necessary planning and advertisement considerations;
- Application Forms, including requisite Certificates of Ownership;
- Application Drawings;
- Design & Access Statement;

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- Heritage Statement; and
- Drawing Schedule (V1)

The advertisement application fee is £462, being the applicable fee for “other advertisements”. There is no fee payable for applications for listed building consent. These fees are calculated in full accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2012 (as amended).

Relevant Background

The Site comprises of 13 buildings along High Road and are located at the north-west and south-west corners of the Tottenham Hotspur Stadium. Of relevance to the enclosed applications, one building is locally listed, eight are Grade II listed, and four are Grade II* listed.

There are two principal parts to the Site. The northern part of the Site (790-814 High Road) is within the North Tottenham Conservation Area and is collectively known as the ‘Northumberland Terrace’. The southern part of the Site comprises Nos. 744-748 High Road.

The Applicant has a strong track record of delivering projects in the locality that contribute to Haringey’s wider regeneration objectives, including the restoration of significant historical assets within the Site. This includes the restoration of the Grade II listed Percy House (796 High Road) to house the Tottenham Hotspur Foundation, and which provides an exemplar of heritage regeneration in this part of Tottenham, alongside the restoration of the Grade II listed Warmington House (744 High Road) which was removed from Historic England’s Heritage at Risk register following the Applicant’s interventions.

The Northumberland Terrace is also subject to phased regeneration to better reveal its heritage significance and deliver a new Cultural Quarter for this part of Tottenham.

The entirety of the Site falls within Site Allocation NT7 (Tottenham Hotspur Stadium), allocated for significant regeneration to include the new football stadium and significant residential, leisure, and commercial uses, amongst others.

Proposed Development

The proposals comprise a series of commemorative heritage plaques to be installed to several of the High Road properties. They comprise blue circular, bronze circular and bronze rectangular plaques which are to be fixed to the buildings and (in two cases) the external pavement and which have been designed in accordance with English Heritage guidelines.

The key principle underpinning the proposals is to generate a sense of pride and celebrate the cultural diversity and history of this part of Tottenham. Collectively, the plaques will form a bespoke heritage trail that will increase awareness of Tottenham’s rich cultural, historical and architectural past alongside the story of Tottenham Hotspur Football Club within this part of Haringey. The plaque installations will be supported by online digital content to supplement people’s walking of the trail.



The proposals are, therefore, an important part of the Applicant's ongoing heritage restoration within this part of Tottenham.

Appendix 1 summarises the commemorative plaques that are proposed to each individual property. This also identifies which consents are sought for which plaques, and in summary:

- With the exception of a proposed bronze rectangular plaque to 814 High Road which is not a statutorily listed building (it is locally listed only), LBC is sought for all plaque installations. In total, LBC is sought for 17 plaques comprising 5 blue circular, 2 bronze circular and 11 bronze rectangular plaques.
- The majority of the plaques benefit from deemed advertisement consent under Schedule 3, Part 1, Class 2A of the Town and Country Planning (Control of Advertisement) (England) Regulations 2007. There are two exceptions to this only by virtue of the height above ground of the installations, and express advertisement consent is therefore sought for 1 blue circular plaque to 808 High Road and 1 blue circular plaque to 810/812 High Road.

Appendix 1 confirms which plaques require advertisement and LBC consent.

The proposals are minimal additions to the buildings and do not materially affect the external appearance of the respective host buildings when read as a whole. As a consequence, they do not therefore comprise development for which planning permission is required. Agreement on this position is sought from the local planning authority as part of the application.

Planning Policy and Assessment

Advertisements

The National Planning Policy Framework (NPPF, July 2021) states that control over advertisements should be operated in an “*simple, efficient and effective*” way and that they should only be subject to control in the interests of amenity and public safety (Para. 136). This is to ensure a lighter touch regime than the system for obtaining planning permission¹.

“Amenity” is not explicitly defined by the Advertisement Regulations, although the Planning Practice Guidance (PPG) states that it includes the general characteristics of the locality including the presence of any feature of historic, architectural, cultural or similar interest. Advertisements should not adversely affect the visual amenity surrounding a site and should be in-keeping with the surrounding character.

Public safety includes all considerations which are relevant to the safe use and operation of any form of traffic or transport on land, including the safety of pedestrians. Advertisements at junctions,

¹ Confirmed by the Planning Practice Guidance (PPG), Paragraph: 001 Reference ID: 18b-001-20140306.



roundabouts and pedestrian crossings in-particular need to ensure that they would not have an unacceptable impact on public safety, although the PPG does recognise that there are less likely to be road safety problems if the advertisement is on a site within a commercial locality.

Within the adopted Development Plan, Policy DM3 of the Haringey Development Management DPD requires advertisements to be designed to a high standard and to be sensitive to a building's appearance, particularly listed buildings.

More generally, the London Plan (Policy D8) and Haringey Strategy Policies (Policy SP11) seek for well designed places that relate to the local and historic context. The Tottenham Area Action Plan seeks for improved public realm and enhanced linkages to existing and new walking routes within Site Allocation ST7 (which includes the Site).

In this case, advertisement consent is required for 2 blue circular plaques only. Both plaques are of a limited size and scale, and importantly are sensitively related to the host heritage buildings and the surrounding heritage context. They fully accord with the local characteristics and would have merit to the surrounding amenity, with no adverse amenity or public safety matters arising. They are, therefore, fully appropriate.

Heritage

The starting position for determining heritage applications is the statutory duty to preserving listed buildings and their setting (Section 66) and preserving or enhancing the character of appearance of Conservation Areas (Section 72) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The NPPF attaches great weight to the conservation of heritage assets, requiring applicants to describe the significance of such assets and to thereafter consider whether any harm would occur to this significance from a proposal. Where this harm is "less than substantial", it must be outweighed by the public benefits arising (Para. 202).

The effects on non-designated heritage assets should also be taken into account, balancing the scale of any harm to the significance of the asset (Para. 203). The PPG confirms that LBC is, however, only required for designated heritage assets, in this case being the statutorily listed buildings and not the locally listed 814 High Road.

Within the London Plan, Policy D3 encourages proposal to respect and enhance the heritage assets of a local area. Policy HC1 requires proposals concerning heritage assets to conserve the asset's significance.

At the local level, Strategy Policies SP11 and SP12 require proposals to respect local character and historic significance, conserve the borough's heritage assets and increase the accessibility of the historic environment.



The enclosed Heritage Statement considers the potential impact of the proposals, concluding:

- Neutral impact on Numbers 790, 792;
- No impact on Number 794;
- Minimal harm to buildings 796, 808, 810, 812; and
- No harm to buildings 798, 800 and 802.

As such, there is only a minimal level of harm arising to four of the listed buildings. This is at the very lower end of the “less than substantial” scale and is outweighed by the following public benefits in this instance:

- The proposals are sensitive, heritage-led installations which will allow a greater appreciation and understanding of the heritage significance of the area.
- The proposals will respect the heritage assets and provide complementary enhancements to these.
- Establishing a heritage trail will encourage walking and cultural interest in the local community.
- The heritage trail is integrally linked to the wider heritage-led regeneration of the area and is an important part of this wider strategy.

The proposals will preserve (and arguably enhance) both listed buildings and their setting, alongside the character and appearance of the North Tottenham Conservation Area. Any harm is clearly outweighed by the public benefits, and both the statutory duty and requirements of the NPPF are satisfied.

Indeed, the approach to enhancing the appreciation of heritage assets and increasing the accessibility of the historic environment aligns with objectives of the Development Plan policies at the London and local level.

I trust that the above is acceptable, and I look forward to receiving confirmation of validation in due course.

Yours sincerely

James Beynon
Associate Director

enc. As noted.
cc. Richard Serra – Tottenham Hotspur Football Club
Alan Carruthers – F3 Architects



Appendix 1



Appendix 1

No.	Property	Proposal	Size (mm)	Area (sqm)	Projection (mm)	Height Above Ground (mm)	Listed Building?	LBC Required?	Advertisement Consent Required? *
1	744 High Rd	Blue Circular	490 (diameter)	0.19	32	3,500	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
		Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,500	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
2	746 High Rd (external pavement)	Bronze Circular (Floor)	490 (diameter)	0.19	10	10	Y	Y (assumed within curtilage for the avoidance of any doubt)	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
3	748 High Rd (external pavement)	Bronze Circular (Floor)	490 (diameter)	0.19	10	10	Y		N - Deemed consent granted under Schedule 3, Part 1, Class 2A
4	790 High Rd	Blue Circular	490 (diameter)	0.19	32	2,800	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
		Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,300	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
5	792 High Rd	Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,430	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
6	794 High Rd	Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,600	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
7	796 High Rd	Blue Circular	490 (diameter)	0.19	32	2,700	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
		Bronze Rectangular	297 (w) x 210 (h)	0.06	10	2,070	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
8	798 High Rd	Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,300	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
9	800 High Rd	Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,300	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
10	802 High Rd	Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,300	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
11	808 High Rd	Blue Circular	490 (diameter)	0.19	32	5,440	Y	Y	Y – Express consent required
		Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,300	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
12	810/12 High Rd	Blue Circular	490 (diameter)	0.19	32	5,440	Y	Y	Y – Express consent required
		Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,300	Y	Y	N - Deemed consent granted under Schedule 3, Part 1, Class 2A
13	814 High Rd	Bronze Rectangular	297 (w) x 210 (h)	0.06	10	1,300	N (locally listed)	N	N - Deemed consent granted under Schedule 3, Part 1, Class 2A

* References to Schedule XX, Part XX, Class XX refer to the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.