



FAO: Planning Department,
Haringey London Borough Council

Ref: HGY/2023/0021
Date: 27/02/2023

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: 43 Beaconsfield Road, Tottenham, London, N15 4SH.

Built Heritage Advice pertaining to an application for: Single storey rear and side infill extensions at ground floor, loft conversion with rear dormers to main and outrigger roofs. Installation of solar panels to roofs.

The proposed development site (the Site) is located within Sub Area 3 (Clyde Circus and adjoining streets) of the Clyde Circus Conservation Area.

In statutory terms the significance of the heritage asset has been recognised by its designation as a conservation area, which reflects its 'special interest'. The Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act 1990) states that Local Planning Authorities have a statutory duty to ensure that 'special attention shall be paid to desirability of preserving or enhancing the character or appearance of that area.'

Furthermore, Paragraph 199 of the National Planning Policy Framework (NPPF) states:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Limited information has been provided regarding the contribution the Site makes to the special interest and significance of the Clyde Circus Conservation Area. Any scheme which has the potential to affect the significance of a heritage asset should be informed by an adequate heritage baseline. This is a requirement of the NPPF and is also good practice to ensure a high-quality scheme is realised.

Paragraph 194 of the NPPF 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

The following publications and advice notes from Historic England are useful guidance in producing Heritage Statements/Statements of Significance:

- Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management (Second Edition)
- Historic Environment Good Practice Advice in Planning 2: Managing Significance in Decision-Taking in the Historic Environment
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets – (Second Edition)
- Historic Environment Good Practice Advice in Planning 12: Statements of Heritage Significance

Notwithstanding the absence of an adequate heritage baseline, the Clyde Circus Conservation Area Appraisal (CAA) provides some commentary on this part of the conservation area and describes Beaconsfield Road as:

'a long straight road that links Clyde Road with West Green Road to the south. It is fronted by relatively consistent two storey terraces of Victorian dwellings and is lined intermittently with trees, which contribute to the streetscene. The majority of the front gardens are poorly maintained and many have lost their boundary walls and are used for car parking.

...Nos. 1 to 139 (odd), a long terrace which lines the entire eastern side of the road, are identical properties constructed of yellow London stock brick with slate roofs. They have ground floor canted bay windows and entrance surrounds that incorporate stucco detailing as well as first floor decorative stucco window lintels.'

It is not possible to support the proposals by reasons of design and scale.

There are concerns regarding the proposed rooflights and solar panels to the front, street-facing, roof slope; rooflights and solar panels are incongruous features within historic streetscapes and are not considered appropriate in conservation areas, particularly to the most prominent and visible elevations.

Whilst it is acknowledged that there is a precedent for street-facing rooflights within the environs of the Site, it is incumbent upon local planning authorities to ensure that negative or intrusive features within conservation areas do not become prevalent, thereby failing to preserve or enhance the character and appearance of the conservation area, contrary to Paragraph 206 of the NPPF.

Whilst sustainability and energy efficiency are legitimate issues, for traditional buildings (pre-1919), buildings in conservation areas, and buildings which form part of the setting of heritage assets, a balance must be achieved between generating its own energy and avoiding damage both to the

significance of the heritage asset, and the visual impact of the renewable installation on the character and appearance of the historic building or site.

When choosing a location for a proposed solar array it is considered best practice to appraise each option sequentially in the following order of preference:

- Ground-mounted
- To the roof of any outbuilding (such as garage or shed)
- To the roof of a later / modern extension
- To the rear, or least visible, roof slope of the host dwelling

It should be noted that demonstrating that a preferred alternative location is not viable, does not mitigate the potential harm caused by solar panels to roofs, and some heritage assets may not have the capacity for this change. There is no presumption for acceptability without carefully considered options.

Both the rooflights and solar panels to the front, street-facing roof slope would have an adverse visual impact, failing to preserve the character and appearance of the Clyde Circus Conservation Area, contrary to Paragraph 206 of the NPPF.

There are also concerns regarding the proposed dormers. The proposed rear dormer appears excessively large and visually overbearing relative to the Site and the wider host terrace, concealing the entirety of the rear roof slope. Taken together with the proposed dormer to the outrigger, it would obscure the architectural composition of the host dwelling and would dominate the rear elevation. As such, the proposals would fail to preserve or enhance the character and appearance of the Clyde Circus Conservation Area, contrary to Paragraph 206 of the NPPF. The proposed dormer, therefore, would lead to less than substantial harm to the designated heritage asset, making Paragraph 202 of the NPPF relevant. Furthermore, no clear and convincing justification for that harm has been provided, contrary to Paragraph 200 of the NPPF.

This harm may be mitigated by reducing the width of the proposed dormer and retaining a gap above and below the respective eaves and ridge heights of the main roof. The dormer should not read as a top-heavy and visually dominant addition which subsumes the original roof of the Site, as the proposed dormer would. Rather, it should be subordinate and subservient to the original roof so that the original intended form and architecture remains legible; this would, at a minimum, preserve the character and appearance of the Clyde Circus Conservation Area.

The existing outrigger, in terms of height, is subservient to the host dwelling, ensuring the original intended design and floorplan remains largely legible. In contrast, the addition of the proposed dormer to the existing outrigger would detract from the visual dominance and prominence of the host dwelling when viewed from the rear.

When considered individually, the proposed rear and side extensions may be acceptable, however in the context of the proposals would result in an adverse cumulative impact which would result in a near-complete obscuration of the original architectural composition of the rear elevation and an over-development of the Site.

Overall, it is considered that the proposals would fail to preserve the character and appearance of the Clyde Circus Conservation Area and would, consequently, constitute a scheme which would lead to less than substantial harm to the designated heritage asset, making Paragraph 202 of the

NPPF relevant. Furthermore, no clear and convincing justification for that harm has been provided contrary to Paragraph 200 of the NPPF.

In summary, it is not possible to support the proposals as they are in conflict with Paragraphs 194, 199, 200, 202, and 206 of the NPPF, and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Yours sincerely,

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Historic Environment Team
Place Services

Note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter