

Planning & Heritage Statement

Tottenham High Streets High Street Heritage Action Zone: St Mark's Methodist Church

April 2023



London



Harrogate



Bristol

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Report Reference:

21/6271HER

1. Introduction

- 1.1. This Planning & Heritage Statement has been prepared in conjunction with the London Borough of Haringey.
- 1.2. This project is part of a wider scheme within the Tottenham High Street Heritage Action Zone Programme (HSHAZ) following a grant from the Ministry of Housing, Communities and Local Government and the Department for Digital, Culture, Media, and Sport, which is administered by Historic England.
- 1.3. St Marks' Church is a locally listed building within the Bruce Grove Conservation Area, in which it is described as a key landmark in the area.
- 1.4. The project aim for St Mark's is to improve St Mark's, its facilities, and its architectural contribution as a landmark site within the area.
- 1.5. The proposed works are as follows:
 - Repair and refurbishment of the Art Deco façade;
 - Replacement of first floor fenestration;
 - Enhancements to ground floor shopfronts including new lighting and signage;
 - Enhancement to entrance canopy, entrance screen and uplighting;
 - Improvements to boundary treatment including new fencing, landscaping, and urban greening;
 - Improvements to the car park including new lighting and surfacing;
 - Installation of a SuDS Strategy for the site.
- 1.6. The team engaged with Council officers in pre-application discussions in March 2022 and following design evolution and agreement with key stakeholders, it is now possible to bring forward these exciting and much needed enhancements to this prominent site.
- 1.7. This report has been prepared to inform the full planning and advertisement consent applications and focusses on the significance of the heritage assets potentially affected by the proposals and the impact of the proposals upon that significance, as well as other planning policy considerations.

Bruce Grove Conservation Area Map



Source: London Borough of Haringey

Satellite View



Source: Google Earth

St Mark's Church (East Elevation)



Source: Historic England

St Mark's Methodist Church (Viewing North and East Elevations)



Source: Heritage Potential

2. Site Description & Background

- 2.1. St Mark’s Church is situated within the Bruce Grove Conservation Area and is identified as a locally listed building which is recognised as a key landmark in the area. The site is also within the Tottenham Area Action Plan and Tottenham High Road ‘Area of Change’.
- 2.2. St Mark’s occupies a busy commercial location with the main frontage facing onto the busy Tottenham High Road. Other commercial units align the High Road to the north, south and immediately opposite to the east. The area takes on a quieter, suburban residential character to the west, along Forster Road and St Loy’s Road.
- 2.3. It occupies a highly accessible location (PTAL 6a - high). There are bus services on the high road and the Bruce Grove Overground Station in close proximity to the north.
- 2.4. The site itself is split between different commercial and community uses. The ground floor of the Art Deco main frontage is occupied by 4 separate retail / E Class uses. The frontage also contains the main, central access to St Mark’s Methodist Church with nave and chancel running to its rear. The Morning Star Nursery occupies the western portion of the site.
- 2.5. The applications do not cover any internal alterations and do not propose any change of use that would alter this site make-up. They solely propose physical external upgrades across the site.

Planning History

- 2.6. The following applications are relevant to the site:

Reference	Description	Decision	and Date
HGY/2021/0151	Alterations to the entrance of the church including replacement of the existing front entrance doors and central dome light and adapting existing drainage to accommodate new foul services.	Unknown	
HGY/2011/0271	Alteration to main entrance doors to community hall including providing level access	Approve 05.04.2011	–
HGY/2003/0589	Erection of first floor extension to provide new creche and external play area and associated internal attractions	Approve 08.05.2003	–
HGY/1996/0191	Erection of internally illuminated fascia and projecting box signs.	Refuse 09.04.1996	–
HGY/1996/0064	Minor alterations to existing shopfront	Refuse 16.04.1996	–
HGY/1995/0307	Installation of projecting canopy, replacement of main entrance doors and glazed screen.	Approve 27.06.1995	–

Pre-Application Feedback

- 2.7. The design team engaged Haringey Council for pre-application discussions. A meeting was held with the planning and conservation officers on 28th April 2022. The following advice was received on the key technical areas.

Conservation and Design

- 2.8. The Council's conservation officer noted how the proposed building works will “*unveil the quality and landmark role of the building and have been soundly designed with a thorough understanding of the historic importance, architectural quality, special character and landmark role of the building and its site.*”
- 2.9. The proposed boundary improvements and branding exercise along Forster Road was also supported in principle with a strong encouragement to increase the visual permeability and landscaped quality of the new boundary enclosure as well as softening the carpark through increased landscaping provision.
- 2.10. The proposed use of architectural lighting to emphasize the architectural interest of the building and to provide more lighting along Forster Road was also considered another positive element of the proposals.
- 2.11. Officers also considered that the proposed refurbishment works would improve the existing shopfronts therefore, this element was also generally supported.

Drainage and Flooding

- 2.12. Comments were received by the Council’s drainage engineer in relation to the proposed SuDS strategy. They noted that any planning application would need to include details of the proposed surface water drainage scheme in accordance with the drainage hierarchy in order to comply with the requirements of policies 5.13 and SP5.
- 2.13. The full planning application is supported by a full Drainage Survey that demonstrates compliance with local policy requirements and a marked improvement from the existing position.

Highways & Transportation

- 2.14. The Council's highways engineer was also consulted on the proposals and did not envisage any adverse impacts or issues, subject to comment from TfL on the application submission.
- 2.15. The full planning application is supported by a Transport Technical Note. Upon review of final drawings it was concluded that there would be no transport or highway implications that should prevent planning permission from being granted.

Impact on Neighbouring Amenity

- 2.16. The pre-application feedback confirmed that there are no residential properties within close proximity to the site, therefore it is considered that there would be no impact in amenity terms.

Summary

- 2.17. The overall pre-application advice gave the proposals a RAG rating of green and would be acceptable to officers. It noted that the proposals for improvements to the existing façade, shopfronts, boundary, and car park of St Mark’s Methodist Church would be welcomed, subject to satisfactory details of the refurbishment.

- 2.18. It was agreed that any full planning application would be supported by application forms and fee, location plan, site plan, existing and proposed drawings. No energy statement would be required as no new buildings are proposed as part of the application.
- 2.19. In addition to the validation list provided at pre-application stage, this application is supported by a Planning & Heritage Statement, DAS, Drainage Survey and Transport Statement to offer satisfactory details of the refurbishment in line with pre-application feedback.

3. Legislation, Policy & Guidance

Heritage Legislation

- 3.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 is the primary legislation and foundation on which further policy, and guidance relating to the conservation of the historic environment is built.
- 3.2. Section 72 of the Act relates to the ‘general duty as respects conservation areas in exercise of planning functions’, with Section 72 (1) of the Act stating that in exercising planning functions, *“special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area”*.

NPPF: Heritage (July 2021)

- 3.3. The National Planning Policy Framework, with which all Local Development Plans must comply, constitutes the national level of planning policy and is a material consideration in planning decisions. The NPPF was originally introduced in March 2012 and was subsequently updated and published on 24 July 2018. The NPPF represents a continuation of the philosophy contained within Planning Policy Statement 5 (PPS5), introduced in 2010.
- 3.4. The NPPF was updated in 2018, broadly retaining the wording of the 2012 Chapter on Conserving and Enhancing the Historic Environment (Chapter 16). The NPPF was updated again (February 2019) in order to provide definitions for housing need.
- 3.5. The most recent update was published in July 2021. This did not result in any changes to national policy that would impact this proposal, although paragraph numbers have been updated.
- 3.6. The NPPF uses slightly different terminology to the Act and emphasises that authorities should take account of *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”*.
- 3.7. ‘Conservation’ is defined within the NPPF as *“the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance”*.
- 3.8. No definition of ‘preservation’ (or any variant) is contained within the document. However, Historic England advise that both ‘conservation’ and ‘preservation’ are concerned with the management of change which seeks to sustain the special interest or significance of heritage assets. ‘Conservation’ has the addition of taking opportunities to enhance significance where it is possible and considered to be appropriate. This is discussed in Historic England’s 2018 publication *Decisions: Legal Requirements for Listed Building and Other Consents*.
- 3.9. The NPPF also helps to define other key terms within heritage policy. These are provided within the table below.

Term	Definition
Heritage Assets	<i>“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).”</i> (p.67)

Significance	<i>“The value of a heritage asset to this and future generations because of its heritage interest, this interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”</i> (p.71)
Setting of a Heritage Asset	<i>“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”</i> (p.71)

- 3.10. Paragraph 194 stipulates that within applications, applicants are required to describe the significance of the heritage assets affected and the contribution made by their setting. Local authorities should also identify and assess the significance of the heritage assets affected by a proposal. This should be taken into account when assessing the impact of a proposals on a heritage asset (Paragraph 195). Paragraph 197 of the NPPF goes on to state that when determining applications, local planning authorities should take account of:

I. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

II. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

III. the desirability of new development making a positive contribution to local character and distinctiveness.
- 3.11. Paragraphs 199-208 of the document discuss how potential impacts to heritage assets should be considered with paragraph 199 stipulating a requirement for great weight to be given to an asset’s conservation when considering the impact of a proposed development on its significance. The weight given should reflect the importance of the asset.

NPPF Degrees of Harm

- 3.12. Where harm to the significance of a designated heritage asset is identified, the NPPF requires clear and convincing justification of the proposals. The document categorises levels of harm as: total loss; substantial harm; and less than substantial harm
- 3.13. Paragraph 201 states that, where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.

- 3.14. Paragraph 202 states that, where a development proposal will lead to 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, where appropriate, securing its optimum viable use.
- 3.15. Paragraph 203 requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining the application. In weighing applications that directly or indirectly affect 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.
- 3.16. In terms of general design, paragraph 130 requires planning policies and decisions to ensure developments:

a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) Are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 3.17. Paragraph 134 of the NPPF states that applications that are not well designed will be refused, especially where they fail to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.
- 3.18. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 3.19. Paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

The London Plan (March 2021)

- 3.20. Policy D3 ‘ Optimising Site Capacity Through a Design Led Approach’ expects proposals to:
- 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
 - be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through **appropriate construction methods and the use of attractive, robust materials which weather and mature well**
 - aim for high sustainability standards and take into account the principles of the circular economy
 - provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water
- 3.21. Policy D5 - Inclusive Design - Requires development proposals to achieve the highest standards of accessible and inclusive design, including: being designed to take into account London’s diverse population; provide high quality people focussed spaces that are designed to facilitate social interaction and inclusion and be convenient and welcoming with no disabling barriers.
- 3.22. Policy HC 1 - Heritage Conservation & Growth - Seeks for development proposals affecting heritage assets, and their settings, to 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.
- 3.23. Policy S1 12 (G) – Flood Risk Management – encourages natural floor management to be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.
- 3.24. Policy S1 13 – Sustainable Drainage – Part A states that Increases in surface water run-off in all areas need to be identified and addressed. Part B requires development proposals to aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features. Part C states that Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.
- 3.25. Policy T4 – Assessing and Mitigating Transport Impacts – states that, when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide, and strategic level, are fully assessed.

Local Policy

Haringey Development Management DPD (July 2017)

- 3.26. Policy DM1 ‘Delivering High Quality Design’ (A) states that the Council will support design-led development proposals which meet the following criteria:
- Relate positively to neighbouring structures, new or old, to create a harmonious whole;
 - Make a positive contribution to a place, improving the character and quality of an area;
 - Confidently address feedback from local consultation;
 - Demonstrate how the quality of the development will be secured when it is built; and
 - Are inclusive and incorporate sustainable design and construction principles
- 3.27. Part B requires development proposals to relate positively to their locality, having regard to:
- Building heights;
 - Form, scale & massing prevailing around the site;
 - Urban grain, and the framework of routes and spaces connecting locally and more widely;
 - Maintaining a sense of enclosure and, where appropriate, following existing building lines;
 - Rhythm of any neighbouring or local regular plot and building widths;
 - Active, lively frontages to the public realm; and
 - Distinctive local architectural styles, detailing and materials
- 3.28. The Council will expect development proposals to respond to Landscaped boundary and treatments.
- 3.29. Policy DM8 ‘Shopfronts, Signs & On Street Dining’ The Council will require shopfronts, including their signs, security shutters and canopies, to be designed to a high standard and contribute to a safe and attractive environment. In particular:
- The Council will seek the retention of traditional shopfronts of distinctive character contributing to the visual, architectural or historic quality of the local townscape;
 - Replacement shopfronts should conserve original materials as far as possible;
 - The alteration or replacement of an existing shopfront or a new shopfront must allow for easy access by all members of the community;
 - The Council will not support shopfront canopies fixed in the ‘down’ position. Retractable shopfront canopies may be acceptable where they are of an appropriate design and maintain sufficient clearance; and

- Security shutters should be open mesh and, wherever possible, be located internally.
- 3.30. Where required, the Council will grant consent for shopfront signage, including illuminated fascia signs and free-standing display panels, where they contribute to an attractive environment and do not:
- Cause a public safety hazard;
 - Contribute to clutter or a loss of amenity; or
 - Adversely impact the character or appearance of a conservation area.
- 3.31. Policy DM9 ‘Management of the Historic Environment’ will support development that conserves and enhances the significance of a heritage asset and its setting. Proposals affecting a designated or non-designated 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.
- 3.32. Policy DM24 ‘Managing and Reducing Flood Risk’ Seeks to ensure that the Council will ensure all proposals for new development avoid and reduce the risk of flooding to future occupants and do not increase the risk of flooding. Par D States that where SuDS cannot be implemented due to site constraints (such as land contamination or space limitations) robust justification must be provided along with proposed alternative sustainable approaches to surface water management.
- 3.33. Policy DM25 ‘Sustainable Drainage Systems’ asks all minor development to achieve a greenfield run-off rate and, at a minimum, achieve a 50 per cent reduction on existing site run-off rates. For all development where a greenfield runoff rate cannot be achieved justification must be provided to demonstrate that the run-off rate has been reduced as much as possible.
- 3.34. Policy DM31 ‘Sustainable Transport’ requires the submission of a Travel Plan and a Transport Assessment/ Statement in support of development proposals in accordance with the Transport for London thresholds.
- 3.35. Policy DM32 ‘Parking’ States that Development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan.

Other Material Considerations

- A Strategy for Tottenham High Road (2019)
 - Bruce Grove Conservation Area Appraisal & Management Plan (2017)
 - Haringey Urban Characterisation Study (2015)
 - Sustainable Design & Construction SPD (February 2013)
- 3.36. The Site Allocations DPD and Highgate Neighbourhood Plan form part of the Local Development Framework but are deemed not to be relevant.
- 3.37. The Draft ‘New Local Plan’ is at Regulation 18 ‘First Steps Engagement’ Stage and currently not deemed to be a material consideration, although this will be reviewed throughout the project.

4. Significance of Bruce Grove Conservation Area

- 4.1. Bruce Grove Conservation Area was designated in 1991 and the boundary was extended in 1998.
- 4.2. Bruce Grove has a long history with a settlement first recorded in the doomsday survey of 1086 and a manor house existing on or near the site at Bruce Castle by 1254. The area began to expand further in the early post-medieval period, through an influx of city merchants who developed mansions along the High Road. The area's urbanisation from the 16th century onwards reflects its continued attraction to wealthy Londoners and is when the townscape of Bruce Grove and Tottenham High Road began to take shape.
- 4.3. Thomas Clay's map of Tottenham (1619) depicts the High Road with intermittent buildings along its frontage, others set back within enclosed grounds, and concentrations around High Cross and near the northern parish boundary. Farmland or private grounds bordered much of the road.

Thomas Clay's map of Tottenham 1619



Source: London Borough of Haringey

- 4.4. Late-18th and early-19th century building booms had considerable impact, with new villas and terraces which began to spread outward along existing and new side roads, including at Bruce Grove.

Wyburd's Parish Map 1798



Source: The London Borough of Haringey

- 4.5. The most uniform building took place in 1789 with the development of classical villas on the south west side of Bruce Grove (no's 5-16), associated with wealthy quaker families. No's 1-4 Bruce Grove followed a couple of decades later. This row now comprises 9 Grade II statutory listings.

Tottenham High Rd c.1910



Source: The London Borough of Haringey

- 4.6. The urbanisation of the High Road advanced rapidly from about 1872 onwards, following the opening of Bruce Grove station. The High Road's character was incrementally transformed as dwellings acquired ground-floor shops or were converted to other uses alongside purpose-built shopping parades.

- 4.7. By 1905, the semi-rural character of Bruce Grove was also transitioning, particularly with the construction of one such shopping parade (no's 68-109) to the north east of Bruce Grove, replacing a row of Elm trees that once lined the route, opposite the Georgian villas. These terraces of residential over commercial are largely unaltered above ground floor with many early features retained around the later shop fronts.

View Up Bruce Grove, North Eastern Side. Beech & Sons (bootmaker), G. Williams (confectioner), W. Faulstich (hairdresser), Suter's (Cycle Shop). (1911-12).



Source: The London Borough of Haringey

- 4.8. Commercial redevelopment resumed in the inter-war years with new high-street stores designed principally in the 'moderne' and Art Deco style, including the frontage of St Mark's Methodist Church, rebuilt in 1938 due to the structural instability of the original church of 1867. Its unifying frontage with central tower are noted as landmark features within a prominent part of the Conservation Area and contribute significantly to its character.

St Mark's Methodist Church Frontage 1938



Source: Heritage Potential Research

- 4.9. The Bruce Grove Cinema also opened by 1921, designed by the local architect Charles Blackburn. The interspersed inter and some post war development is significant in adding architectural variety to the predominantly Victorian and Edwardian building stock in the Conservation Area.

Bruce Grove (South) 1984



Source: Haringey Archive

Character

- 4.10. The Bruce Grove Conservation Area contains a mix of historic and modern buildings. The length of Tottenham High Road is notable as an example of a late-Victorian commercial townscape with range of active ground floor frontages. As referenced above, it is interspersed with a mixture of retail, leisure, and civic uses from the 19th and 20th century, adding a degree of positive architectural variety.
- 4.11. The historic transition to predominantly commercial usage at ground floor has resulted in a strong building line on Tottenham High Road with very few setbacks, which contributes to the enclosed street frontage and dense high street character.
- 4.12. The larger houses on the south side of Bruce Grove are indicative of the affluent Georgian character of the area and this is recognised in the high concentration of Grade II listed building in this row. The forecourts have been eroded by commercial extensions at no.1-4. They remain discernible at no's 5-16 Bruce Grove, albeit the majority have been resurfaced for car parking.
- 4.13. The Edwardian parade at 68-109 Bruce Grove and inter-war cinema on the north side contrast but, as a collection, the buildings on Bruce Grove are indicative of the key historical phases of the Conservation Area's development, which is significant.
- 4.14. Some of the essential character of Tottenham High Road and Bruce Grove has been eroded by insensitive 20th century development. In particular, changes in retail preferences and in shopping patterns, have resulted in a decline in quality of the street frontages. This includes through replacement or significant alteration to original windows, poor quality shopfronts and obtrusive signage that is not co-ordinated with the architecture of the host building – these detract from the quality of the Conservation Area.

Significance

- 4.15. It is clear that the Conservation Area is significant as an example of an essentially late Victorian and Edwardian commercial townscape, with notable remnants of the Georgian suburban character that preceded it.

Architectural Interest

- 4.16. The Conservation Area has architectural significance deriving from the form and features found within it, primarily, although by no means limited to, on front elevations. The historic phasing of the Conservation Area contributes positively to its architectural variety.
- 4.17. For example, 1-16 Bruce Grove have group value as well-ordered classical houses. The yellow stock brick facades across the row are complemented by stucco dressings, typical of this period.
- 4.18. 68-109 Bruce Grove reflect a typical Edwardian shopping parade, this is a typology that strongly defines the commercial character of the wider area but has been undermined by modern alterations to shopfronts.
- 4.19. St Mark's Church represents the best example of inter-war architectural taste and exhibits a distinctive Art Deco frontage and central tower on a prominent part of the High Road. It is a landmark architectural feature in the Conservation Area.

Historic Interest

- 4.20. The conservation area has historic significance deriving from its well-defined townscape evolution. This includes its early medieval origins, Georgian residential development and significant expansion through the 19th and 20th centuries.
- 4.21. This is expressed in built form through a mix of styles, materials, and typologies that illustrate the historical phasing. For example, classical villas of yellow stock brick are typical of late Georgian speculative development, seen across London.
- 4.22. Purpose built shopping parades, as on Bruce Grove, express the increasing commercialisation of ordinary life in the late Victorian and Edwardian era.
- 4.23. The imposing streamlined concrete frontage of St Marks' and the Tottenham Cinema are two stylistic and material markers of 20th design, encapsulating how such emerging architectural styles were being applied to civic and leisure buildings in the inter-war period. They represent buildings of unusual form, modern materials, and distinctive features (crittal windows, unifying fascia bands etc). that are not normally found on building's that pre-date them.

Archaeological Interest

- 4.24. The site is not in an Archaeological Priority Area but has some potential for archaeological interest based on the evidence of settlement from at least the 13th century. This is beyond the scope of this report.

Artistic Interest

- 4.25. The Conservation Area has some contemporary artistic features, for example the Tottenham Shutter Gallery is a complementary form of public art.

5. Significance of Non-Designated Heritage Assets

- 5.1. St Mark's Methodist Church is a locally listed building and key local landmark (Non-Designated Heritage Asset) at 455 to 457 Tottenham High Road.

Wesleyan Church of 1867



Source: London Borough of Haringey Archives

- 5.2. The church stands on the site of a Gothic Revival church of 1867 (above) which had a tall eastern spire. Tottenham High Road had already formed its commercial / residential character by the time the first church was established. This advanced rapidly from about 1872 onwards, following the opening of Bruce Grove station on the Liverpool Street to Enfield line, which still runs to the west of the site.
- 5.3. The eastern end of the church facing the High Road was rebuilt in 1938 due to structural instability in the spire. Subsequent wartime land mine damage also compromised much of the nave and Sunday school that stood behind the church, which was also demolished.
- 5.4. The main church, including the nave to the rear of the main frontage, was largely rebuilt in brick in 1963 but retains elements of the original building including the lower masonry courses and the western apse and vestry.

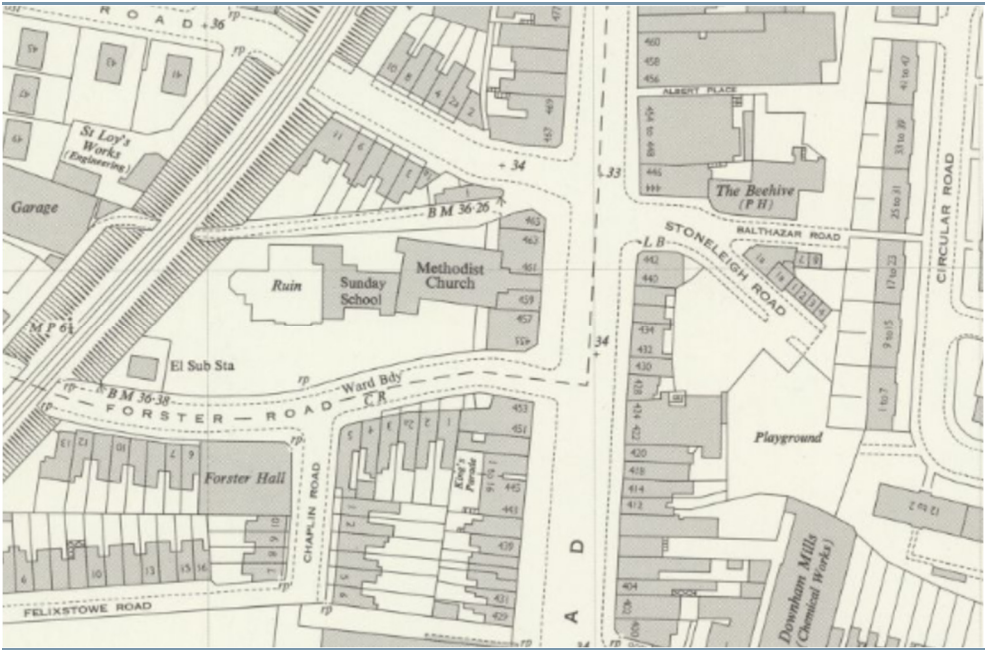
- 5.5. While the architectural cohesion of the original group has been lost and the site presents a mix of architectural styles, the Art Deco style frontage to the High Road is of architectural note in its own right, unifying the earlier church site and ancillary buildings behind an attractive main façade.

OS Map 1896 (depicts site with Gothic Spired Church)



Source: National Library of Scotland

OS Map 1955 (depicts site with Art Deco frontage including commercial units)



Source: National Library of Scotland

- 5.6. The Art Deco frontage is faced in pre-cast stone with a central stepped tower with vertical glazing incorporating a cross, and (mainly) original horizontal steel glazing divided by fluted panels.
- 5.7. The striking tower emphasises a strong vertical axis above the strong horizontal lines of the first floor, motifs typical in the Art Deco style. This façade incorporates commercial properties providing a unified façade for the entire block spanning from St. Loys Road to Forster Road.

Art Deco Church Front (demolished original nave visible to rear) 1939



Source: London Borough of Haringey Archives

- 5.8. The building has suffered from insensitive alterations and accretions over the years, and its overall condition is now worsening. The photographs from c.1939 (above) show that originally there was no canopy over the central entrance, indicating that it is a modern addition. The planning history indicates its installation in 1995 and it is in place by 2002 (below).

Art Deco Front 2002



Source: London Borough of Haringey Archives

- 5.9. More recent alterations include the installation of uPVC windows at first floor, creating an imbalance to the principal elevation and the compartmentalisation of the ground floor frontage into individual fascia bands that contain a mix of modern signage.
- 5.10. Furthermore and as noted at pre-application stage, the façade facing the High Road is showing signs of failure associated with corrosion of underlying steel elements, typical of buildings of the period.

Existing High Road Church Façade



Source: Roger Mears Architects

- 5.11. Elements of the wider site have also had piecemeal alterations that now detract from the overall composition. The boundary treatment on St Loy’s Road and Forster Road are of utilitarian design and unsightly, neither attempting to relate to the church buildings or the Art Deco frontage.
- 5.12. On the St Loy’s elevation, High fencing with ‘Vandgard’ anti-climb measures presents an unwelcoming feel to this side of the church, detracting from its setting. Similarly concrete panel fencing runs the Forster Road boundary are unsightly and out of keeping.

Forster Road Frontage



Source: Heritage Potential

St Loys Road Frontage



Source: Heritage Potential

- 5.13. The buildings on the south west corner of the site are simple and do not contribute positively to the quality of the site or conservation area. Areas of hardstanding in the car parking are surfaced in tarmac with white space markings which also contribute to a jarring immediate setting to the church.

Architectural Interest

- 5.14. The 1938 frontage is one of the finest examples of Art Deco architecture in the Conservation Area and is identified as a key landmark in the area. It has experienced some material deterioration and insensitive alterations to the main frontage. The current

boundary treatment is defensive and utilitarian which also weakens the site wide contribution to the conservation area.

- 5.15. Overall, St Mark’s Church represents the best example of inter-war architectural taste and exhibits a distinctive Art Deco Frontage on a prominent part of the High Road. It is a landmark architectural feature in the Conservation Area and contributes positively to its character (see assessment of Conservation Area above).

Historic Interest

- 5.16. The site has been in ecclesiastical use since at least 1867 and its retained historic use is significant. The site exhibits layers of architectural styles that display the phasing of the site from the mid-19th century. The Art Deco Frontage is characteristic of high-quality commercial redevelopment in the inter-war period.

Archaeological Interest

- 5.17. The buildings are not in an Archaeological Priority Area and is not thought to have any particular archaeological interest.

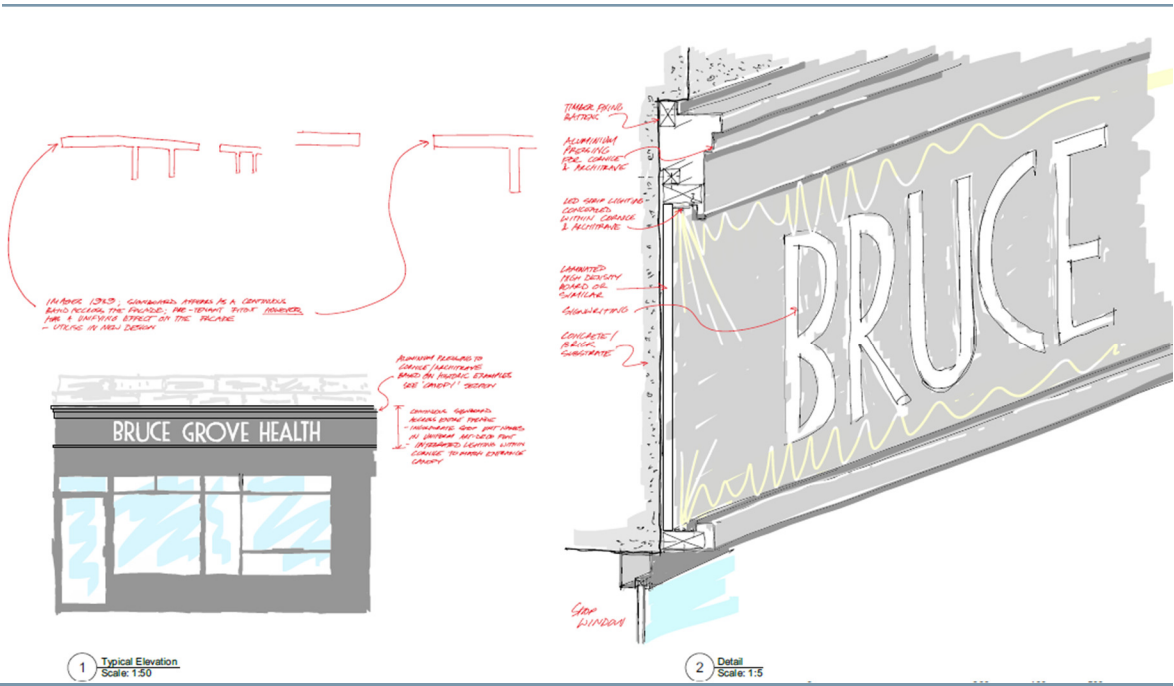
Artistic Interest

- 5.18. The glazed cross motif within the main tower has some artistic, as well as architectural interest.

6. Proposals

- 6.1. The works are part funded by Historic England under the High Street Heritage Action Zone (HSHAZ) in order improve St Mark's, its facilities, and its architectural contribution as a landmark site within the area.
- 6.2. The overall aim of the works is to carry out sympathetic repairs to the building fabric of its main frontage that can be incorporated as seamlessly as possible so as not to interrupt the clean lines and symmetrical composition that is an integral part of the Art Deco style.
- 6.3. Alongside this, the intention is to strip away unsympathetic alterations and accretions that have further compromised the original design intent and replace these with examples that are more in-keeping with the character of the building.
- 6.4. Upgrades to the boundary treatment will also help improve the site's interface with the surrounding area and enhance the immediate setting of the locally listed buildings.
- 6.5. The proposed works in relation to St Mark's Methodist Church (locally listed) are as follows:
 - Repair and refurbishment of the Art Deco façade;
 - Replacement of first floor fenestration;
 - Enhancements to ground floor shopfronts including new lighting and signage;
 - Enhancement to entrance canopy, entrance screen and uplighting;
 - Improvements to boundary treatment including new fencing, landscaping, and urban greening;
 - Improvements to the car park including new lighting and surfacing;
 - Installation of a SuDS Strategy for the site.
- 6.6. More information on the proposed works and the rationale behind each intervention is provided in the accompanying DAS by Roger Mears Architects.

Proposed Shopfront



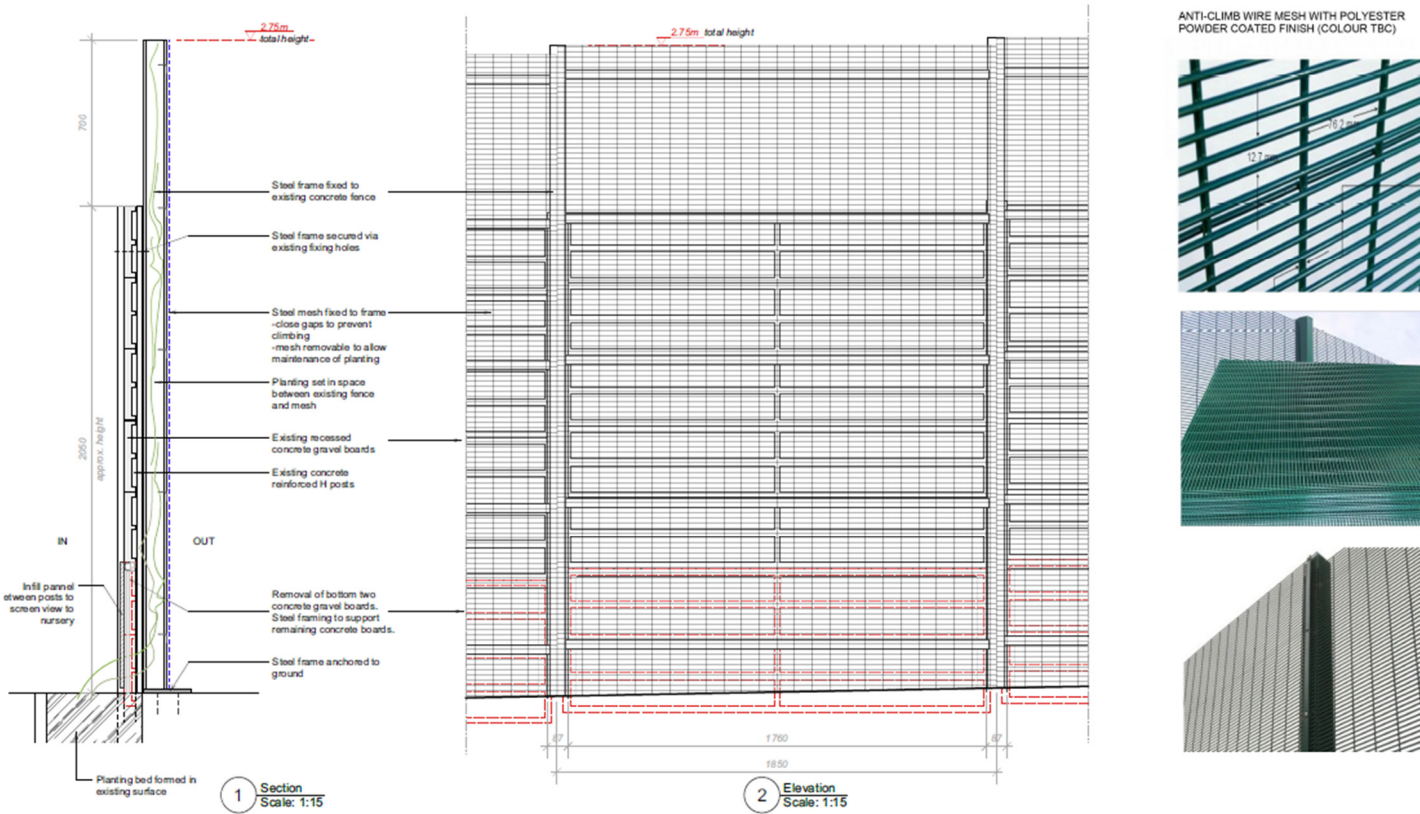
Source: Roger Mears Architects

Proposed Lighting



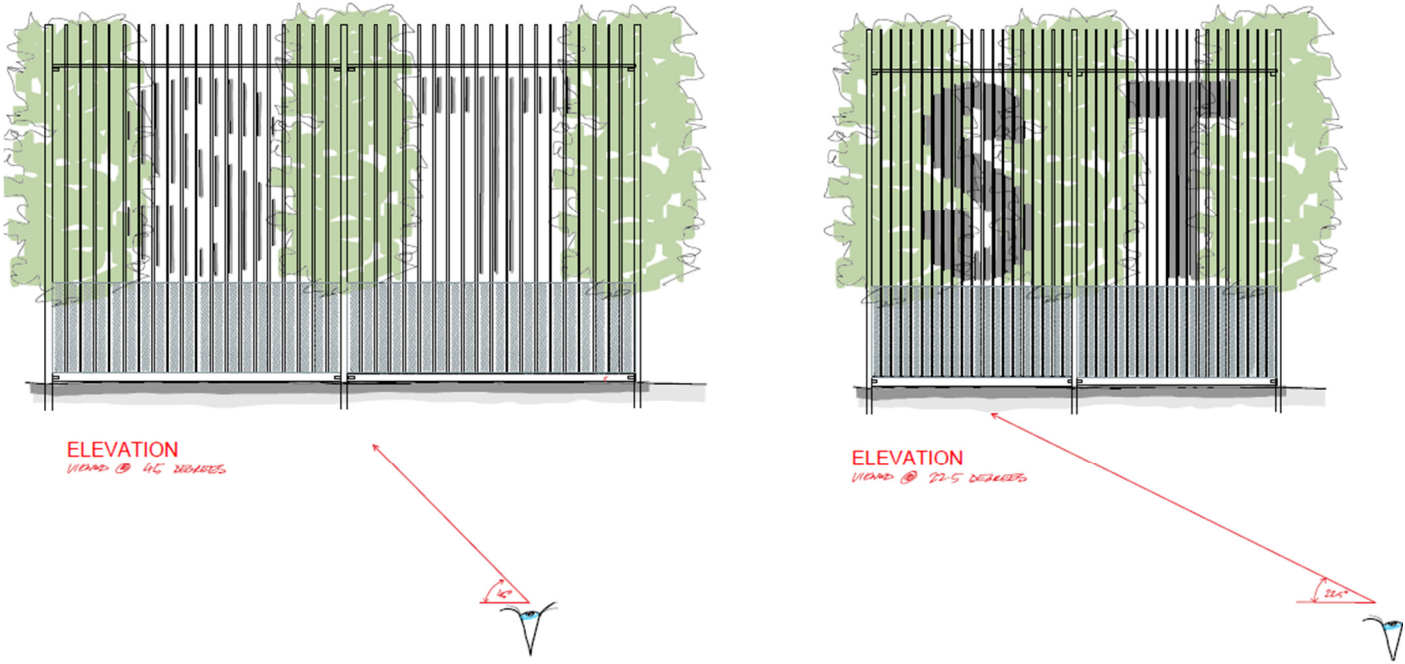
Source: Roger Mears Architects

Proposed North Boundary



Source: Roger Mears Architects

Proposed South Boundary



Source: Roger Mears Architects

7. Planning & Heritage Assessment

7.1. The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework is a material consideration in planning decisions. It also provides guidance on how to draw up Development Plans and policies.

National Planning Policy

- National Planning Policy Framework (NPPF) (July 2021); and
- National Planning Practice Guidance (NPPG).

Development Plan Policies

- 7.2. The application proposal is required to be assessed against the adopted Development Plan for Haringey Council, which comprises the following relevant documents:
- The London Plan (2021);
 - Haringey Strategic Policies (2013 with alterations 2017);
 - Haringey Development Management DPD (2017); and
 - Tottenham Area Action Plan (2021).

7.3. A summary of the relevant planning policies is contained in Section 3 of this Statement.

Main Considerations

- 7.4. The main consideration of this assessment is:
- Impact on the Significance of identified Heritage Assets;
 - Surface Water and Drainage; and
 - Transport.

Impact on the Significance of Heritage Assets

7.5. The two heritage assets considered relevant to this assessment are the Bruce Grove Conservation Area (Designated Heritage Asset) and St Mark’s Church (Non-Designated Heritage Asset).

Repair and refurbishment of the Art Deco façade

- 7.6. As noted in in Section 5, the façade facing the High Road is showing signs of failure associated with corrosion of underlying steel elements.
- 7.7. To gain a more in-depth picture of the extent of the issues, the façade was investigated via MEWP and using the scaffolding present to the tower at that time. The findings are contained within the DAS.
- 7.8. In summary, the investigations have revealed that the majority of repairs to the Art Deco frontage could be dealt with through a mix of low and medium-level intervention. The repairs are proposed to be like for like or a return to a more historically appropriate solution depending on the area of the building.

St Mark’s Tower



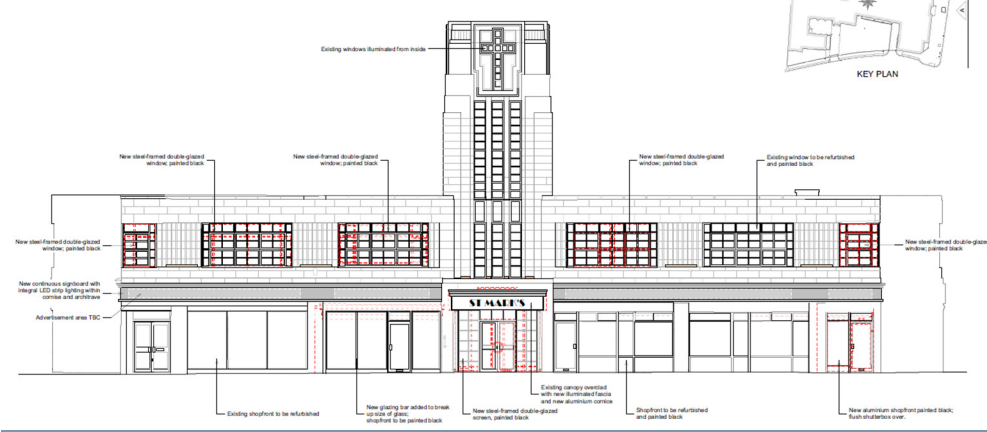
Source: Roger Mears

7.9. Both approaches can only be considered as positive works to the building, both in securing its long-term structural integrity and returning its historic architectural composition where possible. This fully aligns with Local Policy DM9’s objective of preserving and enhancing the significance of the conservation area and locally listed building.

Replacement of first floor fenestration

7.10. The upper floor façade of the Art Deco frontage retains original Crittall style steel windows within the main tower and northern wing. Where these features remain in good condition (tower and north window of health centre), they will be refurbished and repainted as features that contribute positively to the locally listed building.

Proposed East Elevation



Source: Roger Mears Architects

7.11. Other original first floor windows have been assessed and are now at the end of their useful life. They will be replaced with new steel framed double glazed windows (Crittall style MW40) to the same design as the north window of the health centre and painted black. The style and materiality of these replacements are heritage led and appropriate. While not all original windows can be retained because of their present condition, the

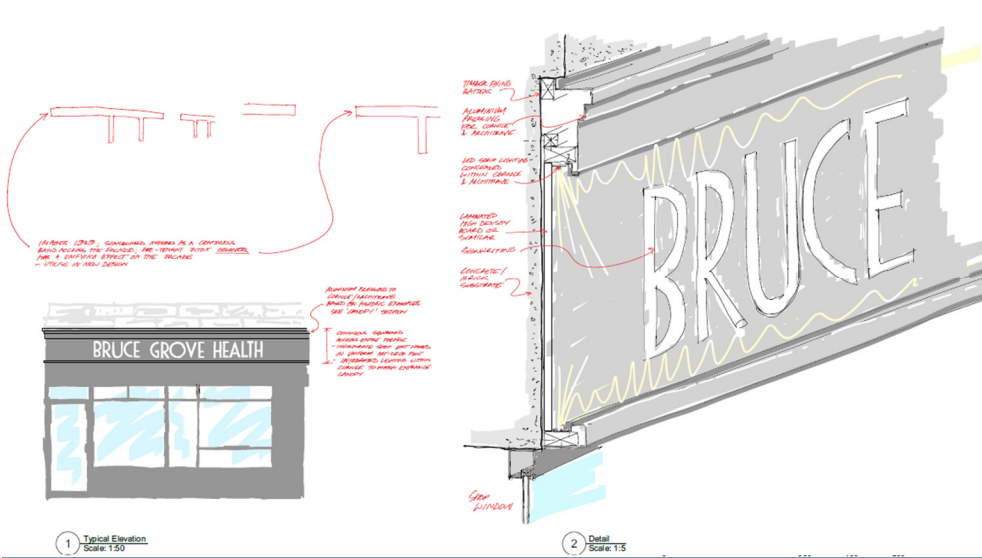
improved functionality and insulation of the new models offer notable spin off benefits and preserve the identified architectural interest of the frontage.

- 7.12. Furthermore, the replacement of modern windows of distinct style on the south wing, that now serve to imbalance the main frontage, with new steel framed double glazed windows (Crittall style MW40), offer a significant heritage benefit and rectification of an insensitive modern intervention. This will help reinforce the symmetry and unity of the wider frontage.
- 7.13. To this end, the balance of architectural and practical improvements at first floor preserve and enhance the contribution of the prominent frontage to the Conservation Area.

Enhancements to ground floor shopfronts including new lighting and signage

7.14. The only shopfront that is thought to be original is the southernmost unit, currently operated by the funeral directors. This is assessed to be in good condition and will be retained. Two other shopfronts (Crazy Cuts and Health Centre), while modern, do not infringe overtly on the quality of the Art Deco frontage and will be retained.

Proposed Shopfront Design



Source: Roger Mears Architects

- 7.15. However, the ‘Pharmacare’ shopfront is modern, bulky, and more harmful to the overall composition. This will be replaced with a new aluminium type shopfront painted black, with an integrated shutter flush to the building frontage to the same design as the health centre next door, resulting in a more balanced visual arrangement. The various alterations at shopfront level are therefore light touch and align with the aspirations of the emerging Design Guide, ensuring proportions, materials and details maintain and reflect local variations.
- 7.16. The advertisement strategy seeks to address the visual disunity of the current frontage, which has been broken down into individual fascia bands per unit. This detracts from the original frontage which was historically unified by a continuous fascia band. To address this, it is proposed to install a new continuous signage ‘band’ across the entire façade to a uniform height and design, with integrated lighting to provide a more sympathetic ‘streamlined’ design. This will be better suited to the Art Deco character of the building, in which the fascia band is an integral part.
- 7.17. Due to the application of a new fascia band and removal of individual bands, these changes require advertisement consent. Furthermore, the approval of an advertisement

Advertisement Details Plan



Enhancement to entrance canopy, entrance screen and uplighting

7.21. Para 2.51 of the local plan states: *“fully internal illuminated box fascias and intrusive signage add to visual clutter and detract from the appearance of the streetscape”*, however, it is contested that when applied to this central entrance canopy position, within a symmetrical frontage, the risk of adding visual clutter is significantly reduced and it is demonstrated that such lighting can actually improve the appearance of the streetscape, rather than detract, when applied to a landmark and distinct Art Deco frontage. To this end, the internal illumination of the entrance canopy is compliant with Local Policy DM1 and DM8 of the Local Plan in this case.

Proposed Entrance Screen



7.22. It is proposed to replace the modern screen with a Crittall style steel framed glazing system, as commonly found on buildings of the period, to improve the overall appearance and function of the entrance. This would represent an enhancement compared to the existing modern entrance screen.

Proposed Entrance Canopy



7.24. This is considered proportionate to draw out architectural features and re-assert the building within the community, without cluttering the frontage **or** obscuring architectural features or proportions. This element of the proposals is also fully compliant Local Policy DM1 and DM8 of the Local Plan, the emerging Design Guide and would enhance the building's contribution to the Conservation Area.

Improvements to boundary treatment including new fencing, landscaping, and urban greening

7.25. The existing boundary treatment to both Forster Rd and St Loy's Road is poor quality and ad-hoc, offering a piecemeal character to the site from the two other principal frontages.

Proposed Southern Boundary (Forster Road)



7.26. Proposals replace the existing solid panel concrete fence onto Forster Road with new steel railings, incorporating public-facing artwork featuring the St Mark's name, reinforces the church's identity and establishes permeability through the site, which is beneficial to its setting. Behind the railings planting creates a green edge and gentle lighting is to be introduced, softening the edge, and promoting its 'setting' in hours of darkness, as well as creating natural surveillance.

7.27. The widening of the vehicular entrance and insertion of a new sliding gate is sympathetic with the railings and includes the rebuilding of a pier improve the balance of the entrance.

Proposed Northern Boundary (St Loy's Road)



7.28. The concept of the green edge is continued on to the north boundary, bringing much needed amenity value to the pedestrianised public space. The existing concrete fence currently detracts from the church's setting and conservation area but is of such a condition where it offers a secure boundary treatment.

7.29. As such, a balance has been struck in retaining this fence and over cladding it with a new steel frame supporting a 'green fence' solution. This allows the existing fence to remain in-situ, minimising cost and disruption while providing a basis to overclad with a more sympathetic public facing solution which helps to improve the interface with the public sphere.

7.30. Both alterations to the respective boundaries are sensitive in heritage and design terms, also offering spin off benefits in terms of security and surveillance. This fully aligns with Local Policy DM9's objective of preserving and enhancing the significance of the conservation area and locally listed building.

Improvements to the car park including new lighting and surfacing

- 7.31. Resurfacing is proposed to provide a new permeable bound gravel surface with soft parking demarcations. This will enhance the amenity value of the space and immediate setting of the buildings, whilst providing a suitable surface for vehicular traffic.
- 7.32. Main pathways between the entrance gates and the building entrances are also to be provided in bound gravel with a provision of soft landscaping. This is another significant improvement in terms of setting and contribution to the conservation area, when compared to the existing position.

Summary of Impacts

- 7.33. Overall, the site wide works have sought to repair a historic understanding of the site, including through sensitive alterations to the main Art Deco frontage and its shopfronts, as well as upgrades to its immediate setting.
- 7.34. Although the site has moved on more notably to other frontages and in the car park, functional improvements and urban greening can also help to contribute positively and reinvigorate the site. All aspects of the proposals are demonstrably heritage-led and well considered in light of the age, style and condition of the current site. This has helped to minimise any potential impacts on either identified heritage asset.
- 7.35. It is concluded that the approach taken represents considerable betterment from the existing position in heritage terms and certainly avoids harm to the locally listed building and character of the Conservation Area. Paragraphs 201 and 202 of the NPPF would not be engaged by the proposed works. Paragraph 203 of the NPPF would be complied with.
- 7.36. Notwithstanding the position in policy, it is worth noting the genuine public benefits at a key communal building that is recognised as a landmark in the conservation area. This is recognised as relevant to the overall balance, as outlined by paragraph 202 and 203 of the NPPF. These include:
 - Heritage informed investment and refurbishment in a prominent locally listed landmark on Tottenham High Road, including building repairs;
 - Considered advertisement strategy for the main frontage, ensuring greater consistency in the future, to the betterment of the building and conservation area;
 - Improvement to the setting of locally listed buildings and the conservation area through enhanced surfacing, boundary treatment and lighting;
 - Reduction in the surface water run-off rate as far as possible in accordance with local drainage policy (noted later);
 - Improved car parking and vehicular access arrangement that fully accords with local transport policy and guidance;
 - Improved security and contribution to public realm through design features that increase surveillance and the experience within and around the site.
- 7.37. The proposals therefore comply with local and national policy, as well as heritage legislation listed in Section 3 of this Statement. There should be no conservation grounds to refuse the applications.

Surface Water and Drainage

- 7.38. Policy DM25 'Sustainable Drainage Systems' asks all minor development to achieve a greenfield run-off rate and, at a minimum, achieve a 50 per cent reduction on existing site run-off rates. Where this is not possible, it asks for development proposals to demonstrate that the run-off rate can be reduced as much as possible.
- 7.39. A Drainage Strategy has been prepared for the wider project. The strategy assesses the surface water run-off and potential betterment from the implementation of these works. It confirms that the proposed and improved drainage systems at St Mark's would create a 97.8% betterment in surface water discharge rate for the 1 in 100-year event + 40% climate change. This fully complies with local Policy DM25 on minor development and is a significant public benefit to factor into the overall balance.

Transport

- 7.40. Pre-application advice received from the Council's highways engineer stated that the applicant will need to provide full dimensional and geometric details including visibility splays, potentially swept path plots, and follow Haringey's crossover guidance as appropriate.
- 7.41. The application is supported by a highways technical note prepared by RPA that has sought to address the pre-application requirements. The note establishes the following findings:
 1. The proposed car park entrance dimensions would offer an improvement over the existing dimensions and the layout would ensure pedestrians are better segregated from vehicles within the site.
 2. The proposed car park entrance would continue to facilitate safe access and egress as confirmed by swept path testing.
 3. The proposed boundary treatment would facilitate improved visibility splays for vehicles and pedestrians.
 4. There would be an overall improvement in the site access with regards to site users, as well as pedestrians and vehicles using the public highway.
- 7.42. Therefore, the technical assessment concludes that there are no transport or highway implications that should prevent planning permission from being granted. The proposals therefore align with Local Policy DM31.

8. Summary

- 8.1. Overall, it is considered that the works are required in order to significantly improve the character and appearance of St Mark's Church and its contribution to the Bruce Grove Conservation Area. The works have been carefully informed by the identified significance and historic development of the area, as well as guidance received from pre-application feedback.
- 8.2. The site wide works have sought to repair a historic understanding of the site, including through sensitive alterations to the main Art Deco frontage and its shopfronts, as well as upgrades to its immediate setting. Although the site has moved on more notably to other frontages and in the car park, functional improvements and urban greening can also help to contribute positively and reinvigorate the site.
- 8.3. All aspects of the proposals are demonstrably heritage-led and well considered in light of the age, style, and condition of the current site. This has helped to minimise any potential impacts on either identified heritage asset.
- 8.4. It is concluded that the approach taken represents considerable betterment from the existing position in heritage terms and certainly avoids harm to the locally listed building and character of the Conservation Area. Paragraphs 201 and 202 of the NPPF would not be engaged by the proposed works. Paragraph 203 of the NPPF would be complied with.
- 8.5. Notwithstanding the position in policy, it is worth noting the genuine public benefits at a key communal building that is recognised as a landmark in the conservation area. These include:
 - Heritage informed investment and refurbishment in a prominent locally listed landmark on Tottenham High Road, including building repairs;
 - Considered advertisement strategy for the main frontage, ensuring greater consistency in the future, to the betterment of the building and conservation area;
 - Improvement to the setting of locally listed buildings and the conservation area through enhanced surfacing, boundary treatment and lighting;
 - Reduction in the surface water run-off rate as far as possible in accordance with local drainage policy;
 - Improved car parking and vehicular access arrangement that fully accords with local transport policy and guidance;
 - Improved security and contribution to public realm through design features that increase surveillance and the experience within and around the site.
- 8.6. The proposals therefore comply with local and national policy, as well as heritage legislation listed in Section 3 of this Statement.
- 8.7. It is respectfully asked that the exciting proposals are approved accordingly.