

- *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;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *respond to local character and history, and reflect the identity of local surroundings and materials...;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *are visually attractive as a result of good architecture and appropriate landscaping.*

4.4.31 Turning to the impact of the proposed stadium development on the wider setting of designated heritage assets beyond the North Tottenham Conservation Area, as detailed in Section 4.3 above, it is considered that the proposals would generally have a neutral impact on the wider setting of the Tottenham Cemetery Conservation Area and from the southern end of the Bruce Castle Conservation Area, where the buildings would be largely screened by trees. The proposed development would have a positive impact on the view from, and therefore enhance the wider setting of, the Alexandra Palace and Tottenham Green Conservation Areas from which it would appear as a positive landmark.

4.4.32 As described above, in the case of views north along the High Road from the Scotland Green and Bruce Grove Conservation Areas, the residential towers would be prominent and viewed in isolation from the stadium and hotel. In these views, without the balancing positive impact of the stadium and hotel, the proposals would result in some 'less than substantial harm' to the wider setting of these conservation areas. This harm would, however, be mitigated by distance, the existing urban form, trees lining the High Road and by the proposed high-quality design of the development and the chamfered form of the towers.

4.4.33 Regarding the impact on Bruce Castle Conservation Area, as described in Section 4.3 above, it is considered that both the impact of the consented scheme and the impact of the proposed development would result in some 'less than substantial harm' to the wider setting of the Bruce Castle Conservation Area in views from the northern end of Bruce Castle Park. This harm would be partly mitigated in the summer months when the park trees are in leaf.

4.4.34 The Barnwell Manor and Forge Field judgements provided detailed consideration of the overarching statutory duty imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve listed buildings and their setting and to preserve or enhance the character or appearance of conservation areas. The harm to the North Tottenham Conservation Area resulting from the demolition of the three locally listed buildings, and the harm to the Bruce Castle, Scotland Green and Bruce Grove Conservation Areas resulting from the proposed buildings would engage the strong presumption against the grant of planning permission referred to by those judgements. Considerable importance and weight must be accorded to this harm. Paragraph 28 of the judgement of Sullivan LJ on the Barnwell Manor Decision stated the following with regard to the strength of the presumption against the grant of planning permission:

If the harm to the setting of a Grade I listed building would be less than substantial that will plainly lessen the strength of the presumption against the grant of planning permission (so that the grant of planning permission would no longer have to be 'wholly exceptional'), but it does not follow that the 'strong presumption' against the grant of planning permission has been entirely removed.

4.4.35 In the Forge Field case the judgement of Lindblom, J. stated of the presumption against the grant of planning permission imposed by the Act that:

It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike a balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

4.4.36 In this instance, it is considered that harm would be caused to the significance of the North Tottenham Conservation Area by the demolition of the three locally listed buildings at 746, 748 and 750 High Road, by the impact of the proposed residential towers on the wider setting of the Scotland Green and Bruce Grove Conservation Areas and by the impact of the proposed development on the wider setting of the Bruce Castle Conservation in the view from the northern end of Bruce Castle Park. While harm would be caused, it is considered that the strong presumption in favour of refusal is outweighed by the substantial public benefits of the proposals which are summarised above and set out in full in the Planning Statement by DP9.

4.4.37 The proposals would accord with the policy tests of the National Planning Policy Framework as the 'less than substantial harm' to the significance of the designated heritage assets resulting from the proposals would be outweighed by the numerous public benefits. Overall, the proposed scheme would enhance the character of the North Tottenham Conservation Area, and the setting of nearby designated heritage assets, meeting the tests for sustainable development set out in the NPPF.

4.4.38 Should it be considered that the proposals would result in substantial harm to the significance of the designated heritage assets listed above this would again, in line with the Planning (Listed Buildings and Conservation Areas) Act 1990, engage the strong presumption against the grant of planning permission as referred to in the Barnwell Manor and Forge Field judgements, and the guidance at paragraph 133 of the NPPF would apply. The latter states that:

Where a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits.

4.4.39 As explained in the Planning Statement and in the crowd flow matrix, the demolition of the locally listed buildings at 746-750 High Road would be 'necessary' to deliver the major crowd flow benefits of the proposed stadium development. It would also be necessary to allow the beneficial successful integration of Warmington House into the proposed stadium development and consequently provide the listed building with an optimum-viable use as part of the proposed museum. Therefore, should the loss of the locally listed buildings be considered to result in 'substantial harm' to the significance of the North Tottenham Conservation Area, it is considered that the proposals would comply with the policy test at paragraph 133 of the NPPF.

4.4.40 Even if the loss of the buildings is not considered necessary to achieve the substantial public benefits of the proposed scheme, the vital importance of the stadium development to the overall regeneration of Tottenham combined with the degree to which retaining the heritage assets would compromise the ability of the world-class stadium development to operate in an efficient, optimum-viable and logical way, would be sufficient material considerations to outweigh the legal presumption established by Barnwell Manor and Forge Field and the policy presumption of the NPPF. These arguments are set out in full in the Planning Statement by DP9.

4.4.41 Overall, the proposals would accord with Haringey Council's relevant local policies including Policy SP12 of Haringey's Local Plan: Strategic Policies which seeks to ensure the conservation of the historic significance of Haringey's heritage assets, their setting and the wider historic environment. In accordance with this policy, and with Policy CSV5 of the Unitary Development Plan (UDP), the proposals would enhance the North Tottenham Conservation Area, Warmington House and its setting, and would provide public access to the Grade-II listed Warmington House. The proposals for Warmington House would accord with policy CSV4 of the UDP by preserving the architectural and historical integrity of the listed building, including all of its remaining original features, and enhancing its setting.

4.4.42 Policy CSV7 of the UDP states that the council will refuse the demolition of buildings in conservation areas if this would have an adverse impact on the character and appearance of the conservation area, but may consider demolition acceptable in exceptional cases where there would be a substantial community benefit. As outlined above, while the demolition of 746, 748 and 750 High Road would result in 'less than substantial harm' to the significance of the North Tottenham Conservation Area, the proposed Tottenham Experience building would provide many substantial public benefits, while the overall benefits of the proposals would outweigh this harm.

4.4.43 The proposed demolition of the locally listed buildings would be contrary to the guidance in Sections 4 and 5 of Haringey's draft Supplementary Planning Guidance (SPG) 2, insofar as this relates to the impact of proposals on conservation areas and to the protection of historic buildings. However, for all of the reasons outlined above, it is considered that this demolition can be justified in heritage terms. The proposals for the restoration and re-use of Warmington House and the overall enhancement of the North Tottenham Conservation Area that the proposals would bring would accord with the draft SPG.

4.5 Conclusion

4.5.1 This report has set out the significance of the heritage affected by the proposals, explained the effect of the proposals on that heritage and made the arguments as to why it is considered that the proposals meet the criteria of the legislation and policy. It has looked at the current situation in the locality of the site and talked about the aspirations of the Tottenham Hotspur Football Club and how the scheme has developed since 2010 and in the light of the riots and the political response to them in the form of the acceptance of the need to positively respond to the social deprivation of the area by planning for regeneration.

4.5.2 Tottenham Hotspur Football Club is acknowledged as the single most significant asset that Tottenham has. It is more than just a sports club, it is an institution whose roots are deeply embedded in the community in N17 and has been for well over 100 years. It has the ability, and perhaps uniquely, to help lead the regeneration of the area. The currently consented proposals would ensure that THFC remain in their historic locality. They would result in major changes to the North Tottenham Conservation Area and the setting of heritage assets both close-by and further afield. But they were flawed, the retained heritage assets would cause crowd safety issues, as explained in the Planning Statement and in the crowd flow matrix, and would compromise the setting of the new stadium and vice-versa. The delays caused to the programme to implement the consented scheme has meant a better understanding of these safety issues and, furthermore, required the reconsideration of the ability of the project to add to the plans for wider regeneration.

4.5.3 These are the key issues that this report addresses and perhaps the key issues for all aspects of the planning deliberations related to this application and, in a way, they are the two elements of the proposals which need to be balanced - are the public benefits which will fall out of the implementation of the proposals sufficient to out-weigh the loss of the three unlisted heritage assets at 746, 748 and 750 High Road and some loss of setting to the nearby Scotland Green, Bruce Grove and Bruce Castle Conservation Areas?

4.5.4 Our answer to this question is that we firmly believe that the project would bring benefits that the consented scheme would not. The 2010 proposal did not have the social imperatives which are now, at least partly, driving the scheme. It was a scheme that did not address the townscape and the setting in the conservation area in a sensitive manner, and while it retained the three locally listed buildings they would have been unrelated to the remainder of the High Road and their rear parts would have been given undue prominence as part of a 'canyon' pedestrian bi-pass, and, indeed their viability was not guaranteed. The proposals offer the full restoration of Warmington House within a new street terrace defining the corridor nature of the High Road and as part of a public museum facility - the Tottenham Experience - its future and 'optimum-viable use' ensured as a key part of the stadium complex.

4.5.5 There are big issues and small issues surrounding the proposals and it is easy to lose sight of the wider picture. After the riots the London Mayor's report said:

The listed (sic, locally listed) buildings adjacent to the stadium need to be reconsidered in light of whether they will make a positive contribution to the area and its future. In our opinion they should be demolished if an appropriately designed new building can be shown to improve the setting of the stadium.

4.5.6 It is view of this report that the new proposals would do just that, with the scale of the High Road reflected in the development on the pavement line, including Warmington House, while the stadium and the residential buildings are set back behind the Hotel, which as a marker and a place making element full fills another role.

4.5.7 The proposals address the heritage and townscape issues but most importantly they also address the wider needs of the area. The stadium complex would (literally in views from Alexandra Palace) be a beacon of aspiration for the area, it would be the signal that society is prepared to invest in N17, its future and its community. While the project would bring investment itself, it would also stimulate further investment. North Tottenham Conservation Area is 'At Risk', its built fabric evidently lacking viability; the new complex would broaden the demographic of the area and lead to wider improvements of the sort set out in the conservation plan for the locality that was commissioned by THFC.

4.5.8 This is a series of proposals that start with new buildings designed to the very highest quality and which would lead to the enhancement of the conservation area. The proposals would help the wider regeneration of the area and along with this would bring further investment for the built heritage. It offers new cultural heritage resources - not just football - but a museum for the community's association with the area. It offers other tangible public benefits in the way of housing and social welfare. It is a very good proposal which, while resulting in the loss of three unlisted heritage assets, would lead to the positive transformation of not just the site but the wider Tottenham area. It is the view of this report that it should be consented.

The Red Line Site Boundary



Appendix II

Statutory Listing Descriptions for Warmington House and the Northern Terrace

No. 744 High Road, Warmington House

Grade II

House. 1828, extended to rear in C20. Stock brick with stucco dressings. Clay tile roof.

PLAN: 3 storeys high, 3 bays wide. Ground-floor is 2 rooms deep to either side of central hall and rear stair leading to first-floor. First and second floors rooms arranged around longitudinal landing. Secondary stair at N end of first-floor landing.

EXTERIOR: Symmetrical façade, partly obscured on N side by No. 744(A). Banded rusticated stucco ground-floor up to first-floor cill band, frieze; cornice band and parapet. Central 4-panel half-glazed door under rectangular fanlight. Sash windows with glazing bars (replaced) on ground and first floors and plain sash windows on second-floor. Moulded architrave to entrance (top section removed). Moulded architraves and unmoulded pediments to first-floor windows. Gauged brick arches to second-floor windows. Stair window on N side elevation; Diocletian window to attic on S side. Some original sashes to rear elevation, including tall round-headed stair window with margin lights. 6-panelled door, modern shallow brick porch (not of special interest). Pitched roof. Single-storey rear extensions are not of special interest.

INTERIOR: Interior retains original room plan form. Hall has cornice with paterae. Double-door openings between front and rear rooms in S ground and first-floor rooms. Stair with mahogany handrail and swept rail to inner string, stick balusters (balustrade currently boxed in); ground floor newel replaced. Round-headed stair window has margin lights, panelled reveals and shutters. Secondary stair also has mahogany handrail, square balusters (a number missing) and turned newels. Elliptical moulded arch across second-floor landing. Other features of interest include some cornices (those to ground-floor S rooms with elaborate mouldings), some simple chimneypieces and grates, ceiling roses (ground-floor). Most door and window architraves survive, vertical sliding shutters to N ground-floor rear room and original six-panelled door, some panelled doors (a number may survive beneath modern flush panels), moulded skirtings and dado rails.

HISTORY: Warmington House is recorded in the Poor Rate books for Tottenham as being built in 1828. Its name derives from James Warmington, farmer, coal merchant and skin salesman, who occupied the property from 1851-76. A later occupant of some note was John Alfred Prestwich, manufacturer of cine cameras, who lived there from 1888-98 and went on to invent the JAP motor cycle petrol engine and to found the JAP Engineering Company. The house was a restaurant from 1911-23. The building was most recently the supporters' club and offices to Tottenham Hotspur FC.

REASONS FOR DESIGNATION: Warmington House is designated at Grade II for the following principal reasons:

- * Of special architectural interest as a house of 1828 retaining its internal plan form, staircases, and a number of original features.
- * Of historic interest as an important survival of the once-numerous Georgian houses that lined Tottenham High Road, one of the principal historic corridors into the capital.

SOURCES Victoria County History, A History of the County of Middlesex, Vol 5, pp 315-324 English Heritage Historians' file HAR/17.

No 790 High Road, Dial House**Grade II***

Late C17 house of 3 storeys, 5 windows. High pitched hipped tiled roof with end chimneys built out from ridge. Sundial on the southern chimney above eaves level, with inscription not legible and date 1691. Coved stuccoed eaves cornice. Replaced plain sash windows in flush box frames under segmental brick arches. Dark red brick. Stuccoed 2nd and 1st floor bands, the latter stepped up over central doorcase of attached rusticated columns, with medallions and friezes above, and mutuled side cornices and open pediment. 2 side flights of 3 stone steps to door terrace with cast iron railing. Nos. 790 to 802 (even) and walls and railing to No 796 form a group.

No. 792 High Road**Grade II**

Early C19 front to probably older house. 3 storeys and basement, 5 windows. Stock brick with stone-coped parapet above stone cornice with brick dentils. Partly concealed high pitched hipped tiled roof. Gauged flat brick arches to replaced recessed sash windows. Door of 6 fielded panels with cornice head, patterned radial fanlight and flanking pilasters. Nos. 790 to 802 (even) and walls and railing to No 796 form a group.

No 794 High Road**Grade II**

Mid C18 house of 3 storeys and basement, 5 windows. Brown brick with red brick dressings including gauged flat window arches, 1st floor string and moulded parapet cornice. Recessed sash windows with glazing bars. Door of 6 fielded panels with rectangular fanlight. Tuscan doorcase with flat pilasters and pediment. Nos. 790 to 802 (even) and walls and railing to No 796 form a group.

No. 796 High Road, Percy House**Grade II***

Mid C18 house of 3 storeys and basement, 5 windows. Brown brick with red brick dressings, including gauged flat window arches, 1st floor string and moulded parapet cornice. Recessed replaced sash windows. Handsome Doric doorcase with frieze of triglyphs and metope, and mutuled cornice and pediment. Nos. 790 to 802 (even) and walls and railing to No 796 form a group.

Forecourt walls and railings to No 796 (Percy House) (Formerly listed as gateway and railings)**Grade II***

Early C18 or late C17 brown brick walls at either side of forecourt; and similar but lower walls in front supporting plain wrought iron railings. At outer angles tall brick piers. At centre a pair of taller rusticated stone piers with cornices and ball finials. Scrolled abutments to piers. Ornamental wrought iron gate with side panels and overthrow. Nos 790 to 802 (even) and walls and railing to No 796 form a group.

No. 798 to 802 (even) High Road**Grade II**

Mid C18 terrace of 3 storeys and basement. Each house 5 windows. Brown brick with red brick dressings including gauged flat window arches, 1st floor string and parapet cornice. The 2 left bays of No 798 have been rebuilt above carriageway and the 2 right bays of No 800 have lost cornice. Sash windows with glazing bars, some replaced. No 798 has door of 6 fielded panels, with plain rectangular fanlight, in modern Doric doorcase of flat pilasters and pediment. No 800 has modern door with entablature surround. No 802 has modern door in eared architrave under pedimented hood on brackets. Nos. 790 to 802 (even) and walls and railing to No 796 form a group.

Appendix III

Verified Views Assessment

Views Across the North Tottenham Conservation Area

View 15: Corner of Lordship Lane, looking northeast

This view is taken from the southern end of the North Tottenham Conservation Area. The view is framed by two prominent corner buildings: on the western corner of the High Road with Lordship Lane the Grade-II listed No. 639 High Road, now the 639 Enterprise Centre, is a neo-Jacobean style red-brick building with a corner octagonal turret with a copper dome and scrolled and shaped gables to the High Road. Built in 1901 as the offices of Tottenham and Edmonton Gas Company by John Sherwell Corder, No.639 was extended in 1914. On the east side of the High Road on the corner of Lansdowne Road is the prominent square corner tower of Nos. 636 & 638, a locally listed, three-storey, Art Deco style department store that was originally built in 1930 for the London Cooperative Society. This building was gutted by fire during the riots in 2011 and has since been fully restored. Beyond No. 639 High Road the western side of the High Road is concealed from view. The eastern side continues at the same scale with two late-20th-century buildings of no architectural merit. Beyond this two large trees frame the High Road as it continues northwards.

The curved form of the stadium would terminate the view north along the High Road. The slender hotel tower would rise behind the trees at the centre of the view but would be largely obscured during the summer months, while the angled form of the upper storeys of the Extreme Sports Centre would be entirely obscured during the summer months. To the east the tapered top storey of the tallest residential tower would be seen. Although the mass and scale of the proposals would have an impact on the view, the development would enhance the conservation area overall, with the stadium and hotel acting as a positive landmark at the centre of the view.

In summary, while changing the current situation dramatically, the proposals would be an enhancement of the currently consented scheme.

View 16: Junction between Northumberland Park and the High Road looking south

This view is located at the northern end of the North Tottenham Conservation Area. On the east side of the High Road in this view are the group of buildings at the north-western corner of the site that are collectively known as the 'Northern Terrace'. In the forefront of the view to the east is 814 High Road, a locally listed former bank constructed in 1905. Beyond this building the early-18th-century Grade II* listed buildings at 808-810 High Road are set back from the High Road behind railing enclosed front areas. The building line steps forward once more at 804-806 High Road, the blank flank wall of the unlisted late-19th-century terrace, creating a rather jarring effect to the continuity of the building line from this viewpoint, before stepping back once more to the Northumberland Terrace, a continuous row of early-18th-century listed buildings that terminates at the Grade II* Dial House. The development to the west side of the High Road in this view has a more continuous building line of two to three storey terraces, some of which are locally listed, with low-quality shop fronts.

The new stadium would rise behind the buildings to the east side of the High Road. There would clearly be a substantial contrast in scale between the stadium and the Northern Terrace but in the foreground of this view the height of the stadium would not exceed the height of the brick chimneys to the Grade II* listed 808-810 High Road leaving these in silhouette against the sky. The design and materials of the stadium, including its perforated metal-clad skin would be in stark contrast to the brick terraced buildings lining the High Road. The stadium would be a landmark building in this view, its simple materials and curved form adding a new dimension to the character of the conservation area and ensuring that, although clearly visible and large scale, the stadium would not detract from the strong rhythm of bays and roofline of the Northern Terrace. The high-quality design of the stadium would enhance the conservation area overall.

In this view the proposed residential towers and hotel building would be largely concealed with the very top of the hotel and the upper floors of the tallest tower only just visible above the stadium roofline. The grid-like form of the top of the residential tower would allow light through this structure giving it a lightweight appearance.

In summary, while changing the current situation dramatically, the proposals would be an enhancement of the currently consented scheme.

View 23: west side of the High Road, on the corner of Cedar Road

This view is taken from towards the southern end of the North Tottenham Conservation Area. This part of the High Road is characterised largely by mid-late-19th-century development. On the western side of the High Road are the locally listed Nos. 665-683 (odd) High Road which form a terrace of mid-late-19th-century red-brick buildings of four storeys with projecting single-storey shop units on the ground floor. On the east side of the High Road, partially visible in the immediate foreground, is the Grade-II listed gate building for the former Whitbread Brewery at 676 High Road. The development continuing northwards along the High Road beyond the Whitbread gates is characterised by 20th-century buildings with slightly larger plots interspersed with earlier 19th-century development, including Nos. 684, 684a & 684b and 686 to 690, all of which are locally listed.

The proposals would see the curved form of the stadium terminating the view north along the High Road, the arched southern 'home' end extending above the terraced buildings in the far distance. The slender form of the hotel would rise in front of the stadium, its lower floors and base concealed behind the terraced buildings on the east side of the High Road, and together the stadium and hotel would form a positive landmark development. The angled upper storeys of the Extreme Sports Centre would also be visible immediately to the east of the hotel but would not be prominent in this view. Further to the east the four residential towers would also be visible, the stepped height of the grouped towers combined with the form of the upper floors, comprising a chamfered grid left open to the sky, would allow visual permeability through the upper sections and reduce the overall mass and bulk of the towers in this view. Although the mass and scale of the proposals would have an impact on the view, the development would enhance the conservation area overall, with the stadium and hotel acting as a positive landmark at the centre of the view.

In summary while changing the current situation dramatically the proposals would be an enhancement of the currently consented scheme.

View 26: White Hart Lane

This view is situated close to White Hart Lane Station on White Hart Lane which forms the most westerly boundary of the North Tottenham Conservation Area. The majority of the view takes in the buildings of the Love Lane Estate. These comprise, to the immediate right of the view, Charles House, a late-20th-century ten-storey tower with a T-shaped plan. Adjoining this to the centre of the view (due to the curve of the road) there is more of the estate's residential housing of a smaller scale, rising to four storeys, and stretching to the south. These buildings are set back from White Hart Lane within grassed areas planted with trees, and enclosed by railings to the pavement. The foreground of the view comprises the road itself and the pavement either side, which is in poor condition. Immediately to the left of the view is one of the entrances to the Peacock Industrial Estate. Beyond, set back from White Hart Lane behind a low brick wall with railings and concealed from view, is the Grade-II listed building known as The Grange at 32, 34 and 34a White Hart Lane. The Grange is a mid-18th-century building with additions dating to the early-19th century.

The curved form of the stadium would be seen in much of this view, rising behind the four-storey residential development on the Love Lane Estate. Further to the south the edge of the hotel would just be visible adjoining Charles House and, from this angle, the 32-storey residential tower would appear to rise to the same height as the hotel. The lower towers of the southern residential development would only be partially visible above the roofline of the stadium and in the summer months the trees in the middle distance of this view, would conceal

all of the towers and much of the stadium. Overall the proposed development would have a positive impact on the character and appearance of the conservation area in this view. It would have no direct impact on the immediate setting of the listed buildings comprising The Grange (32-34a White Hart Lane) which are set back from the road within an enclosed forecourt.

In summary, again, while changing the current situation dramatically the proposals would be an enhancement of the currently consented scheme.

View 27: Junction between White Hart Lane and the High Road looking south

This view is located at the junction between the High Road and White Hart Lane at the northern end of the North Tottenham Conservation Area. This view is only a wireline but a rendered view from the same perspective showing night-time conditions has also been produced and provides additional detail. On the east side of the High Road in this view are Nos. 790-796 High Road, comprising the Grade-II* listed Percy House (796) and Dial House (790) and Grade-II listed 792 and 794 High Road. These buildings, forming part of the group of buildings at the north-western corner of the application site that are collectively known as the 'Northern Terrace', are set back from the High Road behind railing-enclosed front areas, the striking gate posts and boundary wall to Percy House being separately listed. At the centre of the view is Dial House which is the oldest building in the Northern Terrace, dating to the late-17th century and incorporating parts of an earlier 17th-century building. South of Dial House the stadium development site comprises a large gap in the street scene and this, together with the exposed northern return elevation of 750 High Road further south, detracts from the character and appearance of the conservation area.

Apart from the Northern Terrace, this view is dominated by the High Road itself which is almost always busy with traffic. The west side of the High Road is largely concealed in this view, characterised by a partly locally listed terrace of three-storey 19th-century buildings with commercial uses at ground floor level. Street furniture including traffic lights, safety bollards and a bus shelter clutter the view, while a couple of street trees provide some welcome greenery.

The new stadium would rise behind the Northern Terrace infilling the current gap in the building line on the east side of the High Road immediately south of Dial House. There would clearly be a substantial contrast in scale and materials between the stadium and the Northern Terrace, but the metal-clad stadium would be a landmark building in this view, its simple materials and curved form adding a new dimension to the character of the conservation area and ensuring that, although clearly visible and large scale, it would not detract from the strong rhythm of bays and roofline of the Northern Terrace.

As explained above, the proposed multiple entrances and areas of glazing at lower level on the western stadium elevation, including the glazed escalator enclosure, would create visual interaction between the stadium interior and the street and introduce an active street-level frontage. Dial House would adjoin the proposed media café, which would project forward from the stadium at ground-floor level and complement the scale and building line of the ground-floor level of the Northern terrace.

The proposed enhancements to the public realm along the High Road frontage, including the addition of street trees in front of the stadium, would also substantially enhance the streetscape in this view and, overall, it is considered that the proposals would enhance the character and appearance of the conservation area and the setting of the listed Northern Terrace.

In summary, again, while changing the current situation dramatically the proposals would be an enhancement of the currently consented scheme.

View 31: South side of Church Road, looking northeast

This view is taken from the western boundary of the North Tottenham Conservation Area adjoining the northern

boundary wall to Moselle House. Church Road is a secondary road adjoining the High Road at its southern end. The road is well screened by mature trees; to the north of the viewpoint is an open hard landscaped car park and school playground and further east, to the south of Church Road, an area of open green with trees with two early-19th-century buildings set back from the road. 707 High Road (Moselle House) is Grade-II listed and 705 High Road is a locally listed building. Views of these buildings are largely obscured from Church Road and the High Road by the trees and their set back position. Looking east, the existing stadium and the south stand are visible with the THFC merchandise shop in the foreground. To the northeast, between the trees, the front façade and the return blind façade of the former Tottenham and Edmonton Dispensary (746 High Road) can be seen, with the upper levels of the stadium rising behind.

The curved western façade of the stadium and its southern prow over the south podium, the main 'home-end' South Stand, would be prominent above the tree line in this view, with glimpsed views of the Tottenham Experience building possible between the trees. Adjoining the stadium in the middle of the view rises the western façade of the hotel which has been designed by Populous to complement the design and materials of the stadium, and also to follow the angle of the building line further south along the High Road so that in longer views it reinforces the directionality of the building line. The high-quality design of the proposed development in addition to the way in which it would reinforce the line of the High Road would ensure that it has a positive impact on the character of the conservation area in this view. The proposals would have a negligible impact on the immediate setting of the listed Moselle House and adjacent locally listed 705 High Road which is very clearly defined by the boundary wall to Church Road and the concealed green behind it.

In summary, again, while changing the current situation dramatically the proposals would be an enhancement of the currently consented scheme.

View 32: West side of the High Road, at the junction with Ruskin Road

This view is taken towards the southern end of the North Tottenham Conservation Area. On the western side of the High Road, in the immediate forefront of the view is the locally listed Nos. 685 – 689, three mid-late-19th-century red-brick buildings of four storeys with projecting single-storey ground floor shop units, which form part of the same development as Nos. 665-683 (odd), seen in View 23, and continue the same building line. Beyond this terrace, the Grade-II listed buildings at Nos.695-697 are set back from the High Road behind a courtyard enclosed by a boundary wall and railings and are therefore concealed from view. Nos. 695-697, comprise a large pair of three-storey early-19th-century villas that are now in office use. Beyond these buildings is the locally listed Baptist Hall and The Tottenham Baptist Chapel, a classical Grade-II listed building constructed in 1825. The Baptist Chapel is also set back from the High Road with railings to the street and some green planting in its forecourt, and as such is concealed from view, while the Baptist Hall is positioned away from the High Road to the rear of the Chapel. The large trees within the open green space fronting the sports centre form the terminus to the built form along the west side of the High Road in this view.

The buildings on the east side of the High Road in the forefront of the view are Nos. 686 to 690 (even), a terrace of three late-19th-century buildings with bay windows at first-floor level and later projecting shopfronts with modern signage. Nos. 694-692 adjacent to the north are also of three storeys and originally part of the same terrace, however the cornice and parapet to the buildings has been lost and the facades rendered. The terrace continues in the middle distance with the locally listed 700, 704 & 706 High Road, also 19th-century buildings with later projecting shopfronts, and beyond these are a cluster of street trees.

The proposals would see the curved form of the stadium terminating the view north along the High Road. The slender hotel tower would rise in front of the stadium, its lower floors and base concealed behind the terraced buildings on the east side of the High Road, and together the stadium and hotel would form a positive landmark development. The angled upper storeys of the Extreme Sports Centre would also be visible immediately to the east of the hotel but would not be prominent in this view. Further east, two of the four residential towers would rise above the roofline of the late-19th-century terrace on the east side of the High Road. The stepped height of

the towers combined with the form of the upper floors, comprising a chamfered grid left open to the sky, would allow visual permeability through the upper sections and reduce the overall mass and bulk of the towers in this view. Although the mass and scale of the proposals would have an impact on the view, the development would have a minor beneficial impact on the conservation area as a whole, with the stadium and hotel acting as a positive landmark at the centre of the view.

In summary while changing the current situation dramatically the proposals would be an enhancement of the currently consented scheme.

View 33: West side of the High Road opposite, and just north of junction with Bromley Road

This view is taken from the southern end of the North Tottenham Conservation Area looking north. The buildings on the west side of the High Road in this view are screened by an almost continuous row of trees. These trees and the open green area behind them add a welcome punctuation along an otherwise urban road. Hidden from view beyond the trees are 707 High Road, otherwise known as Moselle House, a Grade II listed building dating from the early 19th century, and 705 High Road, a locally listed building also dating from the early 19th century. To the south of these buildings is 701-703 High Road, a mid-20th century Community Sports Centre, also set back behind the open green.

The centre of the view is dominated by the High Road itself, with pavements either side. On the east side of the High Road to the far right of the view is Coombes House, a low quality post-war apartment block. North of this building the pavement widens and the terraced row of buildings immediately south of the site are set back from the High Road on a diagonal building line. These comprise a three-storey red-brick public house (formerly the Bell and Hare, now No.8) dating to the interwar period; a three-storey 20th-century building and, on the corner of Park Lane, a two-storey mid-19th-century building. On the opposite corner of Park Lane is a temporary Tottenham Hotspur ticket office and merchandise shop which detracts from the streetscape. Beyond this the Grade-II listed Warmington House is partially visible, its chimney stacks rising above a large tree located in the foreground and to the pavement. The adjoining Tottenham and Edmonton Dispensary is positioned much closer to the High Road so that in the middle distance of the view its blank return wall is prominent, with the eaves and front elevation of The Red House visible just beyond.

The hotel and stadium would be the most prominent elements in this view, with the dynamic prow containing the main 'home-end' south stand and heart of the proposed stadium development, extending over the southern podium, and the elegant hotel tower forming a striking focal point. The arched glass façade within the stadium south stand would allow a sense of the scale of the single-tier home stand as it is approached from the south and give views directly through the stadium bowl to the sky beyond. The hotel would tower above the three-storey buildings on the eastern side of the High Road but would have no impact on the immediate setting of those buildings set back behind trees on the western side of the road. Although the scale and design of the stadium and hotel would clearly differ from the retained surrounding buildings in this view, both would form a positive new landmark development adding a new dimension to the character and appearance of the conservation area.

At street level below, The Tottenham Experience building would reinforce the High Road building line in the form of a new two-storey terrace flanking the retained and fully restored Grade-II listed Warmington House. This new terrace, with glazed ground-floor shop fronts and cast-iron cladding to the upper levels, would match the scale and mass of the historic buildings flanking the High Road to the north and south and would also be in keeping with the locally listed Church of St Francis de Sale immediately opposite the site. The Tottenham Experience building would be a significant improvement on the arrangement of the buildings at 746-750 High Road which have lost their historic setting and have no coherent visual relationship with the High Road or each other. The proposed southern range of the Tottenham Experience building would be abutted by a fully-glazed entrance pavilion at the southern end that would also be prominent in this view. This would adjoin the southern steps to the podium, flanked on the opposite side by the landmark hotel building, providing a welcoming and obvious entrance to the Tottenham Experience building.

The proposed enhancements to the public realm along the High Road frontage, including the addition of street trees in front of the Tottenham Experience building, would substantially enhance the streetscape in this view.

Immediately east of the hotel the upper storeys of the western return elevation of the Extreme Sports Centre, articulated as a climbing wall, would be visible. This building would rise above the roofline of the public house on the east side of the High Road, and would be partially obscured by a large tree adjoining the pub. Its position, set back from the conservation area along Park Lane, and its subtle design would mean that it would have a neutral impact on the character of the conservation area overall, and in this view its height forms an appropriate step between the roofline of the stadium and that of the closest residential tower further east. The upper storeys of two of the four residential towers located further east along Park Lane would be visible in this view, the form of the upper floors, comprising a chamfered grid left open to the sky, allowing for visual permeability and reducing the mass and bulk of the towers.

Overall, the proposals would enhance the character and appearance of the conservation area in this view and would enhance the setting of the Grade-II listed Warmington House and the locally listed Church of St Francis de Sales opposite the site. The proposed development would have a negligible impact on the setting of the Grade-II listed Moselle House which is set back from the High Road within its own tree-lined area.

In summary, again, while changing the current situation dramatically the proposals would be an enhancement of the currently consented scheme.

View 34: West side of the High Road, just north of junction with Hampden lane

This view is taken from the southern end of the North Tottenham Conservation Area. On the western side of the High Road are the locally listed Nos. 641-663 (odd) High Road, a terrace of mid-late-19th-century red-brick buildings of four storeys with projecting single-storey shop units on the ground floor. On the east side of the High Road, in the foreground is a Georgian terrace set back from the High Road behind large and small street trees. This terrace includes the Grade-II listed No. 662 (at the far right of the view), which was gutted by fire during the 2011 riots and is undergoing renovation. Adjacent to the north are Nos. 664 & 666 (Moore House) also Grade-II listed and of three storeys with a semi-basement, round-headed doorcases, fanlights and panelled entrance doors approached by entrance steps. Adjoining Moore House to the north, but concealed from view by the large trees on the High Road, are Nos. 668 & 668A, which are also Grade-II listed and retain their original Regency blind boxes on the first floor windows. Partially visible in the middle distance is the stock brick front elevation and clock tower of the Grade-II listed gate building for the former Whitbread Brewery at 676 High Road. Beyond this the development along the east side of the High Road is characterised by larger 20th-century buildings interspersed with earlier 19th-century development that is all of a similar, approximately three-storey, height. Of these buildings Nos. 684, 684a & 684b and 686 to 690 are locally listed.

The proposals would see the curved form of the stadium terminating the view north along the High Road behind the slender hotel tower, which would rise above the roofline of the stadium in the centre of the view, its lower levels concealed by the terraced High Road buildings. Although clearly of a much larger scale, the stadium and hotel would form a positive landmark development in this view. The angled upper storeys of the Extreme Sports Centre would also be visible immediately to the east of the hotel; this would rise up above the top of the clock tower to the Grade-II listed Whitbread gate building and would therefore have a minor adverse impact on the setting of the building in this view. Further to the east the four residential towers would be concealed from view, behind the trees on the east side of the High Road in the summer months. They would be partially visible behind and to the west of the Georgian terrace in this view in the winter months but the trees would still form an effective visual buffer and this limited impact in one view of the listed terrace would not be harmful to the overall significance of the listed buildings.

Although the Extreme Sports Centre would have a minor adverse impact on the wider setting of the listed Whitbread gate building, the overall impact on the conservation area in this view would be minor beneficial as the stadium and hotel would act as a positive landmark at the centre of the view.

Views Affecting the Wider Setting of Designated Heritage Assets

Alexandra Park and Palace Conservation Area

View 1: Alexandra Palace and Park Conservation Area

This view is located within the Alexandra Palace and Park Conservation Area. The viewpoint looks east and is taken from an area of high ground in the park. The ground, which is turfed in the forefront of the view slopes down until it reaches a bank of trees in the middle distance. Beyond the bank of trees the urban development of North London spreads out to the horizon. A number of tall buildings are visible breaking the general building line and these add interest to the view.

The proposals would be visible close to the centre of the view. The development would be a new landmark for Tottenham defining its position in North London. The tallest residential tower would rise up behind the proposed hotel building at the centre of the cluster of proposed buildings south of the stadium. The stepped form of the proposed towers, including the hotel, would break up the overall mass of development. The lower lying stadium would sit adjacent to the proposed hotel, with the diagonal line of its home stand end rising up towards the southern development.

By introducing a landmark development of improved overall design, the proposals would be an enhancement of the consented scheme in this view.

Tottenham Cemetery Conservation Area

View 10: Tottenham Cemetery Conservation Area

This view is located within the Tottenham Cemetery Conservation Area and looks east. The cemetery is also designated as Metropolitan Open Land in Haringey's UDP and is a cemetery on the Council's Register of Public Parks, Gardens, Squares, Cemeteries and Churchyards of Local Historic Interest. The view is taken from in front of, and looking towards a Grade II listed War Memorial. The foreground of the view is characterised by a flagstone path leading to an area of gravestones and a bench which forms the memorial. The path is flanked by grass verges and manicured hedges that also enclose the area of gravestones. The middle ground of the view is entirely screened by a wall of large mature trees beyond which there are further trees, both within the area of the cemetery and along its eastern boundary.

This view shows that the proposed stadium, like the consented stadium, and proposed towers would not be visible in the summer months, being entirely concealed behind the wall of trees. In the winter months the development may be partially visible but would still be partly screened by the trees. The proposals would therefore have a neutral impact on the setting of the cemetery in this view.

Bruce Castle Conservation Area

View 11: Bruce Castle Conservation Area, north-western edge of Bruce Castle Park

This view is located within the Bruce Castle Conservation Area towards the north western edge of the park. Bruce Castle Park, in addition to Tottenham Cemetery, is also designated as Metropolitan Open Land in Haringey's UDP and is a park on the Council's Register of Public Parks, Gardens, Squares, Cemeteries and Churchyards of Local Historic Interest. The view looks northeast towards the largely two storey residential development to the edge of the park; further to the east is a school building with a clay-tile covered pitched roof. The foreground of the view is characterised by the flat lawns of the park.

The proposed stadium would rise behind the existing development stepping up to the residential towers to the south. There would be a marked increase in the scale of development visible from the park in this view that would contrast significantly with the open and green character of the park. This would therefore result in 'less than substantial harm' to the wider setting of the Bruce Castle Conservation Area, however, during the summer months this harm would be mitigated by the trees in the park which when in leaf would conceal much of the stadium.

Although the proposed hotel and residential development would result in a greater visual impact in this view than the consented scheme, the consented proposals would also introduce a large-scale development in this view and would therefore also result in some 'less than substantial harm' to the setting of the conservation area.

View 12: Bruce Castle Conservation Area, southern end of Bruce Castle Park

This view is also located within the Bruce Castle Conservation Area. The viewpoint is located adjacent to and in front of the Grade-I listed Bruce Castle and looks north east. The topography of the park is very flat and views across it are largely screened by large mature trees. The park comprises large grassed areas traversed by footpaths, with areas of planting and a railing-enclosed children's play area.

Like the consented scheme, the proposals would not be visible in this view, being concealed behind successive banks of trees, and would therefore have a neutral impact on the wider setting of the conservation area and Grade-I listed Bruce Castle in this view.

View 35: Bruce Castle Conservation Area, Bruce Grove adjoining Edmansons Close

This view is located in the Bruce Castle Conservation Area looking northeast over Edmansons Close. In the foreground of the view is Bruce Grove road. In the middle distance are railings, bushes and trees which screen an open area of lawn forming the setting to a group of terraced Grade-II listed almshouses. The Sailmaker's Almshouses date from circa 1870 and flank three sides of the enclosed lawn with detached wings at either end. The buildings, which in this view are almost entirely concealed by the vegetation lining Bruce Grove, are two storeys and constructed from yellow stock brick with stone dressings and red brick eaves cornices with bands at first floor level. Visible at the centre of the view is the spire of the central gabled Gothic chapel. There are additional tall trees behind the terrace that extend up above its roofline in this view.

The majority of the proposed development would sit below the roofline of the Grade-II listed almshouses in this view. The upper sections of the two tallest residential towers extend above the general roofline but the tallest tower would be concealed behind the gabled roof form of the central chapel, while the second tower would be concealed by trees.

Tottenham Green Conservation Area

View 13: Tottenham Green Conservation Area, at the junction with Monument Way

This view is taken from the Tottenham Green Conservation Area. On the west side of the High Road, partially visible in the immediate corner is the locally listed Nos. 389 & 391, the former Tottenham Library, built in 1896 and more recently converted to flats. Beyond this building, set back from the road, is the Grade-II listed No. 401 High Road, a three storey late 18th century pair of semi-detached houses that now form a single building. In the middle distance of the view is the locally listed No. 413 High Road, formerly the Felters Hall. Built in 1925, the hall has pitched roofs and mullion and transom fenestration. In the foreground of the view on the east side of the High Road is a disused single-storey public toilet, constructed in brick in a mock-Tudor style with pitched roofs that have deep eaves and mock strapwork, its windows are currently boarded. Adjacent to this further north along the High Road the buildings are set back from the road behind a large area of public realm planted with bushes, beyond which the low scale development of the High Road continues.

The slender southern elevation of the hotel tower would just be visible in this view, but would be partly obscured by mature trees along the High Road. The curved form of the stadium would also be partly visible at the centre of the view. The proposed development would act as a major landmark for Tottenham, with the hotel tower providing an important marker for North Tottenham and the stadium development in this longer view. The residential towers would not be visible in this view.

By introducing a landmark development of improved overall design, the proposals would be an enhancement of the consented scheme in this view.

Scotland Green Conservation Area

View 36: Scotland Green Conservation Area, west side of High Road opposite Aldi

This view is located with the Scotland Green Conservation Area. On the west side of the High Road in this view the buildings are set back from the pavement line behind front areas enclosed with boundary walls and railings. These buildings include Charlton Cottage, a late 18th century house of two storeys that is listed Grade II, and the Grade II* listed Nos. 583 and 585 High Road, a substantial early to mid-18th century house which now forms two dwellings. The second floor sash windows of this building can just be seen through the trees. The front railings to 583-585 High Road, set in a low brick wall and linked by brick pillars, are also listed Grade II. On the east side of the High Road there is an almost continuous terrace of three storey buildings with shopfronts at ground floor level. No. 596 in the foreground is a locally listed building of three storeys with single brick semi-circular brick arches supported by simple brick pilasters to the second floor sash windows. Beyond the terraced buildings on the east side of the High Road, the view is terminated by trees either side of the road that conceal views of the buildings further north.

The four residential towers would be seen from this position on the High Road rising above the tree line, but the stadium and hotel would be largely concealed to the west by the curve in the road. The towers would be prominent in the view along the High Road and would therefore result in some 'less than substantial harm' to the setting of the Scotland Green Conservation Area. This harm would be mitigated by the design of the towers, the upper storeys of which are chamfered and incorporate a grid left open to the sky, allowing for visual permeability and reducing their overall mass and bulk. The impact on the setting of the listed buildings on the eastern side of the High Road would be mitigated by the fact that these buildings are set back away from the High Road and the proposed development would have no impact on their immediate forecourt setting.

Bruce Grove Conservation Area

View 37: Bruce Grove Conservation Area, High Road, just north of junction with Bruce Grove

This view is located within the Bruce Grove Conservation Area. On the west side of the High Road, forming a terrace are the locally listed Nos. 513 to 525 (odd) and 527 to 543 (odd) High Road, with modern shopfronts at ground floor level. Visible in the distance on the west side of the High Road are the tall brick chimneys of No. 549. This is a substantial three storey mid-19th century locally listed bank building. On the east side of the High Road are Nos. 522 to 528 (even), a three storey locally listed building, with a curved corner to its façade, that incorporates bands of deep blue glazed brick and large timber casement windows with glazing bars on the upper floors divided by cast iron fluted Corinthian pilasters. It is a building of architectural merit which has poorly integrated supermarket retail units at ground floor level that detract. Adjacent is a modern red brick building on a single plot between Factory Lane to the south and Dowsett Road to the north, and beyond this the corner bay of Windsor Parade, Nos. 538 to 554 (even) High Road with its octagonal stucco turret supported on fan-shaped corbel vaults above a canted round headed recessed entrance porch. The elaborately detailed three storey terrace is locally listed and was constructed in 1907. The group of lower modern buildings further north are just visible beyond which the view is terminated by a number of mature trees.

Only the form of the residential towers would be seen from this position on the High Road rising above the tree line at the terminus to the view along the High Road. The towers would result in some 'less than substantial' harm to the wider setting of the Bruce Grove Conservation Area but this harm would be mitigated by the design of the towers, the upper storeys of which are chamfered and incorporate a grid left open to the sky, allowing for visual permeability and reducing their overall mass and bulk.

Appendix IV

Legislative Provisions and Planning Policy

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

in considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Similarly, section 72(1) of the above Act states that:

... with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (2012). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

The NPPF has the following relevant policies for proposals such as this:

*14. At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

The NPPF sets out twelve **core planning principles** that should underpin decision making (paragraph 17). Amongst those are that planning should:

- *not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
- *proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing*

buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);

- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*

With regard to the **significance** of a heritage asset, the framework contains the following policies:

129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 131 of the NPPF identifies the following criteria in relation to this:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.*

With regard to potential '**harm**' to the significance designated heritage asset, in paragraph 132 the framework states the following:

...great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

With regard to '**substantial harm**' to the significance of a designated heritage asset, paragraph 133 of the NPPF states the following:

133. 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 loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

With regard to '**less than substantial harm**' to the significance of a designated heritage asset, paragraph 134 of the NPPF states the following:

134. 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 securing its optimum viable use.

In terms of the effect of an application on the significance of **non-designated heritage assets**, the NPPF states:

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

In relation to the consideration of applications for development affecting the **setting of a designated heritage asset**, paragraph 137 of the document states the following:

Local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance. 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.

With regards to the loss of a building (or other element) which makes a positive contribution to a **Conservation Area**, paragraph 138 states this should be treated:

...As substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area...as a whole.

National Planning Practice Guidance

The planning practice guidance was published on the 6th March 2014 to support the National Planning Policy Framework and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment. The relevant guidance is as follows:

Paragraph 3: What is meant by the conservation and enhancement of the historic environment?

The conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits.

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use to as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified, the aim then is to capture and record the evidence of the asset's significance which is to be lost, interpret its contribution to the understanding of our past, and make that publicly available.

Paragraph 7: This states the following with regard to sustainable development:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Paragraph 8: What is “significance”?

“Significance” in terms of heritage policy is defined in the Glossary of the National Planning Policy Framework.

In legislation and designation criteria, the terms ‘special architectural or historic interest’ of a listed building and the ‘national importance’ of a scheduled monument are used to describe all or part of the identified heritage asset's significance. Some of the more recent designation records are more helpful as they contain a fuller, although not exhaustive, explanation of the significance of the asset.

Paragraph 9: Why is ‘significance’ important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The “setting of a heritage asset” is defined in the Glossary of the National Planning Policy Framework.

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is a viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also the future conservation of the asset. It is obviously desirable to avoid successive harmful changes carried out in the interests of repeated speculative and failed uses.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.

The optimum viable use may not necessarily be the most profitable one. It might be the original use, but that may no longer be economically viable or even the most compatible with the long-term conservation of the asset. However, if from a conservation point of view there is no real difference between viable uses, then the choice of use is a decision for the owner.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused provided the harm is minimised. The policy in addressing substantial and less than substantial harm is set out in paragraphs 132 – 134 of the National Planning Policy Framework.

Paragraph 17: How to assess if there is substantial harm?

What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.

Policy on substantial harm to designated heritage assets is set out in paragraphs 132 and 133 to the National Planning Policy Framework.

Paragraph 20: What is meant by the term public benefits?

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset

Paragraph 39: What are non-designated heritage assets and how important are they?

Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'.

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process.

Paragraph 41: How are non-designated heritage assets identified?

When considering development proposals, local planning authorities should establish if any potential non-designated heritage asset meets the definition in the National Planning Policy Framework at an

early stage in the process. Ideally, in the case of buildings, their significance should be judged against published criteria, which may be generated as part of the process of producing a local list.

58. Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

- 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;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- are visually attractive as a result of good architecture and appropriate landscaping.

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

The purpose of the Good Practice Advice note is to provide information on good practice to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (NPPG).

Note 2 'Managing Significance in Decision-Taking'

This note provides information on:

assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

It states that:

The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.

In their general advice on decision-taking, this note advises 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 first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest.

Paragraph 6 highlights the NPPF and NPPG's promotion of early engagement and pre-application discussion, and the early consideration of significance of the heritage asset in order to ensure that any issues can be properly identified and addressed. Furthermore, the note advises that:

As part of this process, these discussions and subsequent applications usually benefit from a structured approach to the assembly and analysis of relevant information. The stages below indicate the order in which this process can be approached – it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate.

- 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;*
- 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 Assessment of Significance as part of the Application Process

Paragraph 7 emphasises the need to properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process, in order to form a successful development, and in order for the local planning authority to make decisions in line with legal objectives and the objectives of the development plan and the policy requirements of the NPPF.¹

8. Understanding the nature of the significance is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

9. Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

10. Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives.

11. To accord with the NPPF, an applicant will need to undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.

Conservation Principles and Assessment

Conservation Principles (2008) explores, on a more philosophical level, the reason why society places a value on heritage assets beyond their mere utility. It identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. These values can help shape the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.²

Opportunities to Enhance Assets, their Settings and Local Distinctiveness

52. Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will

have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.

Design and Local Distinctiveness

53. Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- The history of the place*
- The relationship of the proposal to its specific site*
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size*
- The size and density of the proposal related to that of the existing and neighbouring uses*
- Landmarks and other built or landscape features which are key to a sense of place*
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*
- The topography*
- Views into, through and from the site and its surroundings*
- Landscape design*
- The current and historic uses in the area and the urban grain*
- The quality of the materials*

Note 3 'The Setting of Heritage Assets'

This note provides guidance on the setting of heritage assets, which is separate to issues of curtilage, character or context.

The Extent of Setting

4. The setting of a heritage asset is 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.

The setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, or be quite distinct from it. Extensive heritage assets can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. I.e. A conservation area will include the settings of listed buildings and have its own setting.

Views and Setting

5. The contribution to the setting of a heritage asset can be expressed through a wide variety of views.

6. Views which contribute more to understanding the significance of the heritage asset include:

- those where relationships between the asset and other historic assets or places or natural features are particularly relevant;*
- those with historical associations, including viewing points and the topography of battlefields;*

- *those where the composition within the view was a fundamental aspect of the design or function of the heritage asset; and*
- *those between heritage assets and natural or topographic features, or phenomena such as solar and lunar events.*

Even if recent unsympathetic development has affected the setting or views of a heritage asset, consideration will still be given to whether developments would further detract or enhance the significance of the asset.

Setting and the Significance of Heritage Assets

9. Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset, which may vary from asset to asset.... Therefore, implications of development affecting the setting of heritage assets should be considered on a case-by-case basis.

Setting and urban design

The numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations, and often relate to townscape attributes such as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

Setting and economic and social viability

Sustainable development under the NPPF can have important positive impacts on heritage and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic and social viability of a heritage asset can be diminished if accessibility from or to its setting is reduced by badly designed or insensitively located development.

A staged approach to proportionate decision-taking

10. Protection of the setting of heritage assets need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development.

Local Policy

Haringey's development plan is made up of the London Plan 2011, the Local Plan: Strategic Policies 2013 and the Saved UDP Policies.

Haringey's Local Plan Strategic Policies 2013 - 2026 (March 2013)

Policy SP12 of the Local Plan Strategic Policies is of relevance to the proposals.

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.

Policy SP12 notes the following about the Tottenham High Road Historic Corridor:

The Tottenham High Road Historic Corridor covers an extensive area, stretching approximately 3.7km between Enfield to the north and Stamford Hill to the south. Accordingly, it is relatively diverse in character and appearance and is subdivided into six Conservation Areas, each with unifying characteristics such as scale, massing, use, architectural style and detailing and period of development. Tottenham High Road Historic Corridor is centred upon the High Road; a wide, busy road which is fronted almost continuously by terraces of three or four storeys, with commercial uses at ground floor. However, interspersed within the frontage are a number of larger civic, educational and religious buildings. There are also a number of open spaces along the length of the High Road, at Scotland Green, Tottenham Green and Seven Sisters/Page Green. The residential roads flanking the High Road are characterised by more finely grained terraces of two and, occasionally three storeys with a greater degree of uniformity in materials and architectural detailing. The character of the High Road and its restaurants, cafes, retailing and commercial outlets reflects its diverse ethnic mix. The eastern part of the borough is where most of Haringey's future growth will take place. Where this growth is adjacent to the Tottenham High Road Historic Corridor, the Council will seek to ensure that future development takes into account its sensitive context and maximises opportunities and benefits for the local area as a whole.

Haringey Unitary Development Plan (adopted July 2006) Saved Policies: March 2013

The following saved policies are of relevance to the proposals:

CSV4: ALTERATIONS AND EXTENSIONS TO LISTED BUILDINGS

The Council will require that alterations or extensions to listed buildings:

- a) are necessary and are not detrimental to the architectural and historical integrity and detailing of a listed building's interior and exterior;*
- b) relate sensitively to the original building; and*
- c) do not adversely affect the setting of a listed building.*

An important part of Haringey's history is written into the pattern of its development, and the image of Victorian and Edwardian terraces and neighbourhoods typifies the borough for many of its residents. Each historic property is an important part of a unified terrace or street. As such, alterations and extensions should have regard to the guidance set out in Conservation and Archaeology SPG2. It is important to preserve the original features such as windows, doors and doorways, garden walls, brickwork, mouldings, chimneys, railings, paths and roof tiles, as the loss of these features greatly affects the overall balance and elegance of whole terraces.

CSV5: ALTERATIONS AND EXTENSIONS IN CONSERVATION AREAS

The Council will require that alterations or extensions to buildings in Conservation Areas:

- a) preserve or enhance the character of the Conservation Area; and*
- b) retain or reinstate characteristic features such as doors, windows or materials of buildings.*

Alterations and extensions to buildings in Conservation Areas should have regard to the guidance set out in Conservation and Archaeology SPG2. If the Council feels that a Conservation Area is at risk from the loss of original features or from alterations such as, the demolition of original walls to form parking places in front gardens, the addition of storm porches, or the installation of Unplasticised Polyvinyl Chloride (UPVC) windows, it may issue an Article 4 Direction. This limits the changes a homeowner can make without the Council's permission. There are currently three Article 4 Direction Areas in Haringey, details of which are given in table 11.2. The areas concerned are: Noel Park, Tower Gardens and Rookfield.

CSV7: DEMOLITION IN CONSERVATION AREAS

The Council will seek to protect buildings within Conservation Areas, by refusing applications for their demolition or substantial demolition if it would have an adverse impact on the character and appearance of the Conservation Area.

In some exceptional cases, if substantial community benefit would result from total or substantial demolition of buildings in Conservation Areas the Council may consider this to be acceptable. Each case will be judged on its merits and weighed against arguments in favour of a building's preservation. Further information is available in the Conservation and Archaeology SPG2. Haringey's historic buildings and Conservation Areas are cherished landmarks that relate to the borough's history and give it a vital sense of place. Local people want these areas and landmark buildings to be protected.

Haringey's Supplementary Planning Guidance (SPG) 2: Conservation and Archaeology

This SPG, referred to in the relevant saved policies of the Unitary Development Plan, provides guidance with regard to the preservation and enhancement of conservation areas and the protection of historic buildings. Although in draft form (with reference to the superseded PPG15), the SPG carries material weight for the determination of planning applications. It contains the following relevant guidance:

4. PRESERVATION AND ENHANCEMENT OF CONSERVATION AREAS

4.1. The Council will seek to preserve and enhance the character and appearance of conservation areas and will promote proposals within, adjacent to, or affecting a conservation area that preserve or enhance the appearance, character or setting of the local area. The Conservation Area Appraisals contain special guidance identifying the local distinctiveness of individual conservation areas, the types of buildings within them that are to be preserve and/or enhanced, and the weight to be given to the preservation or enhancement of these characteristics and features as against other development needs. The Council will:

- 1. Protect from demolition buildings and structures which make a positive contribution to the character or appearance of the area and which define its identity.*
- 2. Ensure that all new build developments, and improvements to existing buildings and structures, are of high aesthetic design standards, and that they respect and are sympathetic to the particular local character or appearance of the conservation area involved. New developments should have regard to the contribution to local character provided by (i) existing historic property plot sizes, (ii) traditional uses or mixes of uses, (iii) characteristic materials scaling of contemporary buildings and detailing, (iv) local views, (v) the extent to which traffic intrudes or reduces the enjoyment of an area by pedestrians, (vi) the intensity of development in the locality.*
- 3. Protect trees that are of public amenity value and contribute to the character of the area.*
- 4. Insist that changes of use respect and enhance the local historic as well as visual character of the conservation area.*
- 5. Protect local views, landmarks and topographical features, either within or adjacent to the conservation area, particularly key vehicular or pedestrian approaches, having regard to the policies and local views identified in the local conservation area appraisal.*

4.2. The Council is required to have special regard to the desirability of preserving or enhancing the character and appearance of conservation areas (areas designated for their special architectural or historic importance). Schemes should avoid harming the character and appearance of a conservation area, and where possible, positively enhance it by appropriate standards of design, layout and arrangement. Preservation of character and appearance can be achieved by simply avoiding harm, or by taking appropriate steps to reinforce local character. In some cases upgrading buildings, carrying out repairs, or constructing new buildings of quality can enhance the quality of an area.

B. Demolition, Partial Demolition and Changes to the Appearance of Buildings in Conservation Areas

B.1. Applications to demolish whole or substantial parts of buildings or for planning permission to change the appearance of, or remove parts of buildings or other structures in conservation areas will be considered in relation to the criteria below. Applications for demolition will not be agreed where the building or part of the building positively contributes to the overall character or appearance of the building, its setting, or the wider conservation area or setting.

1. Applications will be assessed in relation to the contribution to local character made by the building, its features, its materials, or its architectural integrity and quality, having regard to local historical information and any local character assessment. A building of no great architectural quality may still importantly contribute to local character through its contribution to local historic plot layout, traditional or historic use or mix of uses of the area, characteristic local materials, locally appropriate scaling and detailing, or contribution to local vistas and townscape character.

2. Conservation area consent for full or substantial demolition will not be granted in advance of detailed acceptable proposals for the replacement development, for which full planning permission has been granted and consent will be conditioned, where appropriate, so as to tie demolition to implementation of a full scheme for development.

B.3. The contribution of an unlisted (or locally listed) building in a conservation area is assessed in this guidance broadly in relation to criteria proposed by PPG15. The minor architectural features referred to in this guidance may, where appropriate, include roof coverings, chimney stacks and pots, windows, doors, garden walls render, pointing, or other features.

D. Materials

D.1. New development, alterations or extensions to buildings in conservation areas will be expected to use traditional or other durable natural materials that preserve or enhance the character and appearance of the conservation area.

5. PROTECTION OF HISTORIC BUILDINGS

5.1. The Council will seek to protect the special interest of buildings of architectural or historic interest and in particular will:

2. Protect Historic Buildings from demolition or substantial demolition. Historic Buildings will also be protected from alterations detrimental to their special interest, where the Council has powers to do this. Removal of architectural features from unlisted buildings will require planning permission where the result would materially affect the external appearance of the building. Such changes will not be permitted if prejudicial to the building's special interest, appearance or character, or the local distinctiveness of the area.

5.2. Historic Buildings are buildings of historic or architectural interest, some of which are listed on the statutory national list and others on the Borough's own local list. Buildings on the statutory list are referred to as listed buildings and buildings on the Borough's own Local List are referred to as Locally Listed Buildings. Strategic Guidance draws attention to the intrinsic architectural diversity and quality of London's Historic Buildings. The Government's policies for buildings of architectural and historic interest are set out in PPG 15, and include a presumption against the demolition of locally listed buildings and unlisted buildings that make a contribution to the character or appearance of a conservation area.

5.3. Buildings will be added to the Council's local list as resources for survey work permit. Buildings and structures will be added for their architectural or historic interest, for the contribution to local townscape, for example, through their familiarity or role as landmarks. Locally Listed buildings are not protected from internal

change, but they are normally fully protected from partial demolition and in conservation areas from total or substantial demolition.

5.4. Buildings on the Borough's local list will be subject to the same conservation guidance and objectives in so far as planning control can achieve this. Buildings may be protected in legislation from demolition if they are houses within a conservation area, or if the demolition forms part of a development scheme.

A. Uses of Historic Buildings

1. Change of use of a Listed Building or building on the local list, will be decided having regard to paragraphs 3.8 - 3.11 of PPG15. The best use will very often be the use for which the building was originally designed, and the continuation or reinstatement of that use should certainly be the first option. The new or adapted use should minimise loss of character, fabric, interior or setting.

3. In determining applications for a change of use of historic buildings, the Council will seek to negotiate with the applicant before the change of use is granted in order to obtain a detailed scheme of refurbishment. Where appropriate, this scheme will be the subject of an agreement under section 106 of the 1990 Act.

A.1. PPG 15 says that "Judging the best use" for a listed building "is one of the most important and sensitive assessments that local planning authorities and other bodies involved in conservation can make". In principle the aim should be to identify the optimum viable use that is compatible with the fabric, interior and setting.

A.2. In order to facilitate the re-use of listed buildings, in accordance with Government advice, the Council will give weight to the architectural and historic value of buildings in considering uses which might not accord with other UDP policies but will look as favourably as possible on the opportunities of preservation and enhancement afforded by the proposed change of use.

B. Works to Historic Buildings Affecting their Special Interest

1. Wherever possible all existing fabric, detailing and the contemporary features of Historic Buildings should be preserved, repaired or if missing replaced. All works whether repairs or alterations must be carried out in a correct scholarly manner, under proper supervision by specialist labour where appropriate. Proposed works should not harm the structural stability of Historic Buildings.

2. Alterations or extensions to Historic Buildings and any works within the curtilage affecting their special interest will be permitted if they are shown to be necessary and in no way detrimental to the architectural or historical integrity and detailing of the exterior of the buildings, and to valuable interiors, or where they are they are in accord with the period style, detailing and material of the building. Original plan forms should be preserved and their integrity not compromised. Extensions will be permitted where they relate sensitively to the original building. Where an existing roof is of specific architectural or historic interest it should be preserved. Openings in the party wall between a historic building and another building will not be permitted.

3. The Council will encourage private, voluntary or public owners of listed buildings to make the best use of under-used Historic Buildings, to include sensitive maintenance, repair and improvement.

B.1. Alterations to listed buildings should be confined to the minimum and should protect their special interest. Principles of repair and alteration to listed buildings are included in Annexe C to PPG 15, and interpreting this policy, the Council will pay regard to this guidance, and to English Heritage advice and policy.

E. Character and Setting of Historic Buildings

E.1. The Council will resist development proposals and works that adversely affect the special architectural and historic interest and setting of Historic Buildings.

E.2. The Council wishes to protect the special interest and settings of Historic Buildings in the Borough from inappropriate development.

F. Locally listed buildings - Historic Buildings not on the Statutory List

2. Schemes requiring the demolition of buildings of local interest will not normally be permitted, and in Conservation areas applications for the demolition of locally listed buildings will normally be refused, in accordance with the UDP policy. In the case of Locally Listed Buildings and in other appropriate cases, the Council may seek Article 4 Directions to remove permitted development rights to demolish.

3. The Council will encourage the maintenance and restoration of buildings of local interest and seek to apply the standards for historic buildings above in so far as this is feasible. Development proposals affecting buildings on the Local List must not detract from the building's character or setting.

F.2. Buildings of local interest in Haringey (locally listed buildings) often play a crucial role in anchoring local visual and historic identity. Locally listed buildings may also act as a significant focus encouraging urban vitality, environmental quality and regeneration. The Council attaches special importance to their protection.

The London Plan Policies (Revised Early Minor Alterations 2013)

On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan. These are for consistency with the National Planning Policy Framework. The Revised Early Minor Alterations are operative as formal alterations to the London Plan. The London Plan contains policies that would both affect directly and indirectly the historic environment and development of locations such as this. It states:

Policy 7.8

Heritage assets and archaeology

Strategic

- A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.*
- B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.*

Planning decisions

- C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.*
- D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.*

Policy 7.9

Heritage-led regeneration

Strategic

- A Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.*

Planning decisions

- B The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.*

Appendix V

Key to the 1844 Tithe Map

Number	Name and Description	Land Owner	Occupiers
428	House, buildings & garden	Thomas Clarke Junior	Himself
429	Garden Etc.	Thomas Clarke Junior	Himself
430	House & buildings	Thomas White West	None
431	House, buildings & yard	Thomas White West	John Cock
432	Garden	Thomas White West	John Cock
433	House, buildings & yard	Thomas White West	Elizabeth Wigglesworth
434	Garden	Thomas White West	Elizabeth Wigglesworth
435	Garden	Thomas White West	Thomas Dawe
477	Orchard	Samuel Gittens	Moore
478	House & buildings	Samuel Gittens	Samuel Staples
479	House & buildings	Charles Ansell	Mary Addis
480	Garden	Charles Ansell	Mary Addis
481	House & buildings	Charles Ansell	Miss Pinkerton
482	Garden	Charles Ansell	Miss Pinkerton
483	Building & yards	Charles Ansell	Miss Pinkerton
484	Pleasure Garden	Charles Ansell	Emma Louisa Arnold
485	House & buildings	Charles Ansell	Emma Louisa Arnold
486	House & buildings	Charles Ansell	Himself
487	Two gardens	Charles Ansell	Himself
488	Two gardens	Charles Ansell	A H. Higgins
489	House & buildings	Charles Ansell	A H. Higgins

Appendix VI

Listed Buildings and Locally Listed Buildings in the North Tottenham Conservation Area

Listed Buildings

Grade II* Listed Buildings

East Side

790 High Road (Dial House)

796 High Road (Percy House)

Forecourt walls and railings to No.796 (Percy House)

808 - 810 High Road

Grade II Listed Buildings

East Side

No. 662

Nos. 664 & 666

Nos. 668 & 668A

No. 670

No. 676 (southern gate building at former Whitbread brewery including gate piers, gates and railings)

No. 744 (Warmington House) 792 High Road

794 High Road

798 - 802 High Road

816 - 818 High Road

820 High Road

822 High Road

West Side

No. 639 (including Lordship Lane & High Road boundary walls)

Nos. 695 & 697

Tottenham Baptist Church (including boundary gates & railings)

No. 699 (fronting onto Chapel Stones)

Wall on the south side of Chapel Stones (running west from No. 699 to James Place and south to the factory building)

No. 707 (fronting onto Church Road)

Nos. 797 & 799

Nos. 819 & 821

Nos. 867 & 869

Kings Road (north side)

No. 2 (including boundary walls)

Lansdowne Road (south side)

Church of St Mary

Lordship Lane (north side)

Nos. 8 to 18 (even)

White Hart Lane (south side)

No. 7

White Hart Lane (north side)

Nos. 32, 34 & 34A

Locally Listed Buildings

St Francis De Sales church and Primary School

Former Catholic Chapel and Pastor's House, Chapel Place

Tottenham Baptist Hall, Chapel Stones

No. 628 High Road

No. 634 High Road

Nos. 636 & 638 High Road

No. 676A (former Whitbread's Brewery Offices) High Road

Nos. 684, 684A & B High Road

Nos. 686 to 679 (even) High Road

Nos. 698 & 700 High Road

Nos. 704 & 706 High Road

No. 742 High Road

No. 746 (former Tottenham and Edmonton Dispensary) High Road

No. 748 (former Red House) High Road

No. 750 (former White Hart Public House) High Road

Nos. 754 to 766 (even) High Road

No. 814 (former Barclay's Bank) High Road

Nos. 840 to 850 (even) High Road

Nos. 860 & 862 (Coach & Horses Public House) High Road

Nos. 641 to 663 (odd) Criterion Buildings, High Road

Nos. 665 to 683 (odd) Criterion Buildings, High Road

Nos. 685 to 689 (odd) High Road

Tottenham Baptist Hall (fronting Chapel Stones)

No. 705 High Road

Wall to north of No. 707 High Road

No. 729 (St Francis de Sales Church) High Road

St Francis de Sales Church, High Road

Electricity Substation (adjoining Library) High Road

Nos. 743 to 757 (odd) High Road

Nos. 759 (The Whitehall Tavern Public House) High Road

Nos. 769, 771 & 771A High Road

Nos. 773 to 779 (odd) High Road

Nos. 793 & 795 (former Natwest Bank) High Road

Nos. 801 to 805 (odd) (The Bricklayer's Arms PH) High Road

Nos. 809 & 811 High Road

Nos. 813 to 817 (odd) High Road

Nos. 823 to 829 (odd) High Road

Nos. 841 & 843 (The Chequers Public House) High Road

Nos. 847 to 853 (odd) High Road

No. 865 High Road

Cattle Trough near Borough boundary, High Road

No. 1A (former JAP Motor Cycle & Racing Car Engineering Works) Lansdowne Road

Nos. 2 to 6 (even) Northumberland Park

Nos. 2 & 4 Park Lane

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Date: June 2009

Northumberland Development Project

Ecological Assessment

Prepared by
CSa Environmental Planning

On behalf of
Tottenham Hotspur Property Co.
Ltd.



6523

	Remarks	Date	Prepared by	Authorised by	File Ref
First Issue		03/12/08	LC	AM	1037_02
Second Issue		27/04/09	LC	AM	1037_02a
Third Issue		17/06/09	LC	AM	1037_02b

Report No. CSA/1037/02b

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1.0 Introduction

1.1 This report has been prepared by CSa Environmental Planning on behalf of Tottenham Hotspur Property Company Ltd. It sets out the results of an Ecological Assessment of land at Northumberland Park, Tottenham where a mixed commercial, residential and football stadium development is proposed. The site is heavily developed and includes White Hart Lane football stadium and numerous commercial and residential buildings. This report has been commissioned to explore the potential for any ecological issues arising from the proposed redevelopment of the site.

1.2 This Ecological Assessment aims to:

- Undertake a desktop search for relevant biological records and assess their significance;
- Review the site in relation to its wider ecological context;
- Describe and map the habitats present at the site;
- Identify any potential protected or notable species issues;
- Present the results of further bat activity survey work;
- Specify any more detailed survey work that may be required;
- Evaluate habitats and species in line with standard methodologies;
- Assess potential impacts; and
- Recommend appropriate mitigation or wildlife enhancement measures, where possible.

1.3 This report follows a standard format accepted by ecological consultees across the country, adopting best-practice procedures and methodologies.

2.0 Planning Policy and Legislation

Planning Policy

National Planning Policy

- 2.1 The Government sets out its objectives for conserving and enhancing biodiversity in Planning Policy Statement 9¹. This is the main source of Government guidance on nature conservation and considers the integration of nature conservation policies within land use planning.

The objectives of PPS9 are:

- *'To promote sustainable development by ensuring that biodiversity is conserved and enhanced as an integral part of social, economic and environmental development, so that policies and decisions about the development and use of land integrate biodiversity and geological diversity with other considerations;'*
- *'To conserve, enhance and restore the diversity of England's wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support;'*
- *'To contribute to rural renewal and urban renaissance by:
- enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognizing that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well-being; and
- ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment.'*

London Plan

- 2.2 The Mayor of London sets out principles for the protection and enhancement of biodiversity within the city through Policy 3D.14 of the London Plan, with the following statement of particular relevance:

- *'the planning of new development and regeneration should have regard to nature conservation and biodiversity, and opportunities should be taken to achieve positive gains for conservation through the form and design of development'.*

Haringey Unitary Development Plan 2006

- 2.3 The UDP aims to ensure that development protects and enhances the biodiversity of the Borough, through the following policy:

¹ Planning Policy Statement 9 (PPS9) (2005) Biodiversity and Geological Conservation.

OS11: BIODIVERSITY

All applications and development should respect the biodiversity of the borough, and ensure that the biodiversity is not diminished in any form, and that every opportunity is taken to enhance it. Such enhancements are particularly important in areas deficient in accessible natural green space.

The Council will resist development which would have a significant adverse impact on the population or conservation status of a protected species or species which have been identified as a priority in the UK, London or Draft Haringey Biodiversity Action Plan.

Where development is permitted which may cause significant harm to biodiversity, the Council will first seek to avoid or minimise the impact, then seek mitigation and finally invoke compensatory measures for any residual impacts.

- 2.4 To ensure that sustainability principles are incorporated into all development within Haringey the UDP contains a policy for the concerned with the environmental/natural resource aspects of sustainable development, of which the following section is relevant to this chapter:

UD2: SUSTAINABLE DESIGN AND CONSTRUCTION

"...the Council will seek that development schemes take into account, where feasible:

...m) biodiversity potential within, on and close to building structures, e.g. for bat roosting and feeding and/or other ecological benefits;

...Permission may be subject to conditions, e.g. to ensure that recycled materials are used or planning agreements, e.g. to secure the maintenance of new or existing ecological features."

Draft Supplementary Planning Guidance

- 2.5 Draft SPG 8d 'Biodiversity, Landscaping and Trees', provides guidance on biodiversity, tree protection, landscaping and green roofs. This includes the guidance that due regard must be had to the protected species and habitats as outlined in the Haringey Biodiversity Action Plan (BAP). Draft SPG 8g 'Ecological Impact Assessments' also states that the Council will have particular regard to the Haringey BAP in making an assessment on any application which could have ecological impacts. This SPG also provides examples of typical instances when ecological impact assessment is necessary.

Haringey Biodiversity Action Plan

- 2.6 The Biodiversity Action Plan (BAP) for the borough of Haringey provides a local programme of action to reflect the structures and priorities in the London BAP and the UK BAP. The Haringey BAP prioritises the conservation of those species threatened nationally or in London and species that are rare or of special interest locally. Key habitats and sites are also identified for protection and enhancement of biodiversity. The majority of actions for priority species are listed within the relevant habitat or site plans, with the exception of bat species which have a specific plan because these animals use several different habitats and a large number of species and individuals are found in the borough. Priority habitats and

species within the UK and London BAP that could be potentially relevant are considered even if they are not listed in the Haringey BAP.

Legislation

2.7 This assessment has been prepared taking account of the following legislation relevant to nature conservation:

- Conservation (Natural Habitats &c) Regulations 1994 (as amended)
- The Wildlife and Countryside Act 1981 (as amended)
- The Countryside and Rights of Way Act 2000
- Natural Environment and Rural Communities Act 2006

3.0 Methodology

Desktop Biological Records Search

- 3.1 A biological records search has been conducted to provide information on designated wildlife sites from the Multi-Agency Geographic Information for the Countryside (MAGIC) database and Greenspace Information for Greater London (GiGL) as follows:
- European/ Internationally statutorily designated sites within 5km
 - Nationally statutorily designated sites within 2km
 - Non-statutorily designated sites within 1km
- 3.2 Records of protected and notable species have been obtained from GiGL from approximately 1km of the site boundary and a search for additional protected or notable species records for the 10km square containing the development site (TQ 39) was conducted on the NBN Gateway.
- 3.3 Relevant information received is included within the main text, with additional details included in Appendices A and B.

Field Survey

Site Survey Methodology

- 3.4 An extended Phase 1 survey was undertaken by Luke Casey AIEEM on 15 May 2008, which involved mapping and recording each habitat type and making notes on any evidence of, or potential for, the presence of protected or notable species. This is at a level intermediate between the Phase 1² survey (where standardised habitat mapping is undertaken together with making notes on dominant and notable species) and the more detailed (Phase 2) survey techniques that may be used to specifically record or survey particular habitats or species.
- 3.5 In this survey, plant species observed within each habitat are recorded and habitats are classified and mapped. Note is also taken of the more conspicuous fauna present during the survey, with particular attention paid to any evidence of, or potential for, the presence of protected or notable species.

Bat Survey Methodology

- 3.6 Four bat activity surveys were undertaken at the site, comprising two back-to-back dawn and dusk surveys on 26/27 June 2008 and 08/09 July 2008, which are all within the optimal survey period for bat activity. All surveys were undertaken by Aidan Marsh MIEEM, Kris Long MIEEM and Luke Casey AIEEM. The surveys aim to record and quantify levels of bat activity to assess the potential that roosts,

² Nature Conservancy Council (1990) Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC, Peterborough.

foraging areas or regular flight lines occur within the site boundaries or in the immediate vicinity.

- 3.7 On each survey the three surveyors walked designated transect routes, which encircled the site and also included a leg through the centre, along Paxton Road (see Bat Survey Transect Route Plan CSA/1037/101 in Appendix C). Dusk surveys were undertaken from approximately half an hour before sunset until two hours after sunset. Dawn surveys commenced around two hours before sunrise and ended at sunrise.
- 3.8 Bat activity was picked up using frequency division bat detectors (Batbox Duet and Anabat SD1) in combination with visual observations. Bat echolocations were recorded onto digital mini-disc recorders for subsequent computer analysis using the software 'BatSound V.3.31'. Data recorded with the Anabat remote recording unit was analysed using the computer software 'AnalookW V.3.3f'. Both software packages produce sonograms of bat echolocation calls from which features such as peak frequency and the duration of calls can usually be analysed and compared with known data to differentiate between species and confirm identifications made in the field.

Evaluation and Assessment

- 3.9 Ecological features are evaluated using the Guidelines for Ecological Impact Assessment 2006, produced by the Institute of Ecology and Environmental Management³. These guidelines promote a scientifically rigorous and transparent approach to the ecological assessment process. This methodology provides a standardised approach, formulated from the views of a wide spectrum of ecological professionals.
- 3.10 The process of valuing ecological features and resources is complex and subjective. The factors set out below need to be taken into account when applying professional judgement to value ecological features. Legal protection needs to be considered separately from value. Features that are important for social/community or economic reasons should be identified as part of the assessment and the impacts on these features should be assessed by the ecologist however the significance of the impacts will then be determined by the socio-economic/community specialist.

Geographic Frame of Reference

- 3.11 In assigning value to an ecological feature/resource the following geographic frame of reference should be used.
- International;
 - UK;
 - National (i.e. England/Northern Ireland/Scotland/Wales);

³ IEEM (Institute of Ecology and Environmental Management). (2006). Guidelines for Ecological Impact Assessment (EclIA) – June 2006.

- Regional;
 - County (or Metropolitan – e.g. in London);
 - District (or Unitary Authority, City, or Borough);
 - Local or Parish; and
 - Within zone of influence only (which might be the project site or a larger area).
- 3.12 The size, conservation status and the quality of features or species are all relevant in determining value. Furthermore the value of a species and/or habitat may vary depending on its geographical location.
- 3.13 Some sites have already been assigned a level of nature conservation value through designation. For example:
- *Internationally important sites:*
These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. Sites for which the process of designation has commenced (e.g. potential SPAs, Ramsar sites and candidate SACs) should be given the same consideration as designated sites.
 - *Nationally important sites:*
These are designated as Sites of Special Scientific Interest (SSSI) in England, Scotland and Wales and as ASSI in Northern Ireland.
 - *Sites of lower level importance e.g. Regional, county, district, parish:*
Local Authority and County Wildlife Trust Sites and other organisations have non-statutory designated sites that are of importance at other levels. Such as County Wildlife Sites, Sites of Importance to Nature Conservation, Special Wildlife Sites, etc.

Tree Preservation Orders (TPOs)

- 3.14 TPOs are designated by the Local Planning Authority and are based on amenity related criteria. While this designation does not have any implications to their ecological value they should be considered due to the legal protection they offer.

Hedgerows Regulations

- 3.15 The Hedgerows Regulations 1997⁴ provide for the protection of important hedgerows in England and Wales. To be 'important' a hedgerow must satisfy a number of specific criteria.

Biodiversity value

- 3.16 There are various characteristics that can be used to identify ecological resources or features likely to be important in terms of biodiversity. These include;
- Animal or plant species, subspecies or varieties that are rare or uncommon, either internationally, nationally or more locally;
 - Ecosystems and their component parts, which provide the habitats required by the above species populations and/or assemblages;
 - Endemic species or locally distinct sub-populations of a species;

- Habitat diversity, connectivity, and/or synergistic associations (e.g. networks of hedges and areas of species-poor pasture that might provide important feeding habitat for rare species such as greater horseshoe bat);
- Notably large populations of animals or concentrations of animals considered uncommon or threatened in a wider context;
- Plant communities (and their associated animals) that are considered to be typical of valued natural/semi-natural vegetation types – these will include examples of naturally species-poor communities;
- Species on the edge of their distribution, particularly where that distribution is changing as a result of global trends and climate change;
- Species-rich assemblages of plants or animals; and
- Typical faunal assemblages that are characteristic of homogenous habitats.

3.17 Several published approaches to the assessment of importance and value are available and have informed this approach. These include the Countryside Agency Quality (2001)⁵, Treweek (1999)⁶ and Collis and Tyldesley (1993)⁷.

Valuing habitats

3.18 The value of areas of habitat and plant communities should be measured against published selection criteria where available. For example, the Habitats Directive 1992 lists habitats and plant communities of European importance whose conservation requires the designation of SACs; Local Authorities and Wildlife Trusts have generally prepared criteria for the selection of SINC, and so forth. Where areas of a habitat or plant communities do not meet the necessary criteria for designation at a specific level, the local context may be considered if appropriate, and this should take into account potential value.

3.19 Habitat Action Plans (HAPs) should be considered, as their purpose is to guide conservation action for the habitats concerned.

3.20 Ancient woodlands may be designated at different levels and may be considered important even if not designated. Very mature habitats such as this cannot be readily restored or created.

Valuing species

3.21 The valuation of populations should make use of any relevant published evaluation criteria. For example, there are established criteria for defining nationally and internationally important populations of waterfowl.

3.22 Some species need to be assessed because they are of biodiversity value and/or because a proposal may lead to the contravention of the law. In assigning a level of value to a species, it is necessary to consider its distribution and status, including a consideration of trends based on available historical records.

⁴ HMSO (1997) *The Hedgerow Regulations 1997* – Statutory Instrument 1997 No. 1160.

⁵ Countryside Agency et al. (2001) Overview report – Quality of Life Capital. CAG and LUC, London

⁶ Treweek J (1999) *Ecological Impact Assessment*. Blackwell Science, Oxford

⁷ Collis and Tyldesley (1993) *Natural Assets: Non-statutory Sites of Importance for Nature Conservation*, The Local Government Nature Conservation Initiative

- 3.23 Rarity is an important consideration because of its relationship with threat and vulnerability. Some species are inherently rare, so it is necessary to look at rarity in the context of status. A species that is rare and declining should be assigned a higher level of importance than one that is rare but known to be stable. There are many species in decline throughout the UK, many of those for which the decline is more serious are the subjects of Species Action Plans (SAPs).
- 3.24 Other rarity-related evaluation criteria include the need to protect populations where the UK holds a large or significant proportion of an international species, e.g. a European population. Guidance is available for a number of species groups, which explain how to identify populations of a sufficient size for them to be of national or international importance e.g. dragonflies in the Guidelines for the selection of SSSIs. The need to protect populations where the UK holds a large or significant proportion of an international species is highly important and the evaluation of such populations should reflect this.
- 3.25 Species Action Plans (SAPs) should be considered as they are developed to guide conservation action for the species concerned.
- 3.26 Species and Habitats listed in UK BAPs have statutory protection through Section 74 of the Countryside and Rights of Way (CROW) Act 2000 in England and Wales. The Section 74 list of habitats and species are those the Secretary of State, following consultation with English Nature, considers are of principal importance for the conservation of biological diversity in England⁸, in accordance with the 1992 UN Convention on Biological Diversity⁹.
- 3.27 Some species must be controlled, mainly for public health and commercial reasons, and are legally identified as notifiable weeds under the Weeds Act 1959, or are controlled by the Wildlife and Countryside Act 1981. The Weeds Act 1959 and The Ragwort Control Act 2003 includes five weed species which may be injurious. Although the presence of such weeds may have various dis-benefits they may also have some ecological value. The legal consequences of their presence need to be considered and the ecological impacts assessed in this context.

Potential value

- 3.28 The Habitats Directive 1992 requires Member States to restore European designated sites where they are not of favourable conservation status. The value of such an area must be assessed in relation to the ecological feasibility of restoring it to favourable conservation status, or of enabling another area to be restored. This means that, even a habitat in poor condition may be considered to be of considerable importance, if there is a reasonable chance that it can be restored to a higher value in the future. It should also be noted that potential value is also addressed in some BAPs.

⁸ Section 74 List of habitats and species important to biodiversity in England. www.defra.gov.uk/wildlife-countryside/cl/habitats/minstatement.htm

⁹ Convention on Biological Diversity. www.biodiv.org/convention/articles.asp

Secondary or supporting value

- 3.29 Some features have no obvious value in themselves but perform an important ecological function e.g. acting as a buffer to important habitats. Therefore the importance of a feature may depend on its role within a wider system, as well as the extent to which this role may be assumed by another feature.

Social/community value

- 3.30 People derive benefits from biodiversity in various ways including recreational enjoyment and environmental education. Therefore the social value of the site/species should be considered.

Economic value

- 3.31 Impacts to certain ecological features and resources may have economic implications. Examples of such features/resources include populations of shellfish, fishing lakes and sites for rare breeding birds where tourism/recreation is important. Where such features/resources are to be affected, the likely ecological changes should be described and expert advice sought from an economist on the economic value.

Legal issues

- 3.32 It is important to identify ecological resources/features that are subject to specific legislation e.g. Statutory Wildlife Sites, protected species. In all cases legal and other guidance should be followed to determine whether a proposal will cause any contravention of legal status or protection, or have a significant effect on the integrity of a system, resource or feature.
- 3.33 The legal protection of some features/resources does not necessarily reflect their biodiversity value. For example, badgers under the Protection of Badgers Act 1992, trees protected under TPOs and species legally identified as notifiable weeds. Legal provisions/consequences need to be considered but the biodiversity value should be assessed as described previously.

Multi-functional features

- 3.34 Some features may have ecological, social and/or economic value and therefore the impact on all aspects should be assessed separately before an integrated appraisal is carried out.

Summary

- 3.35 The IEEM (2006) guidelines have been developed to promote a more scientifically thorough and clear approach to ecological evaluation and EcIA. The process of valuing ecological features and resources is complex and subjective and the approach set out above requires careful consideration of a range of factors and the use of professional judgement. Whilst values may still be summarised for convenience in terms of a geographical framework, e.g. county value, parish value etc, it is important that the rationale behind this final evaluation is carefully considered.

4.0 Ecological Context and Site Description

Designated Wildlife Sites

- 4.1 The results of the desktop biological records searches are provided within Appendices A and B. This includes plans highlighting statutorily and non-statutorily designated wildlife sites identified within the data search area, as well as records of protected species.

Statutorily Designated Sites

- 4.2 Two internationally important statutorily protected wildlife sites occur within 5km of the site, which are summarised below, including an approximate distance from the development.

- Walthamstow Reservoirs SSSI and Lee Valley SPA & Ramsar Site – 1.2km southeast

Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) contains a large concentration of breeding wildfowl and in winter attracts nationally significant populations of wildfowl and other wetland birds. The SSSI is a component unit of Lee Valley, designated as a Special Protection Area (SPA) and Ramsar wetland site, encompassing a series of wetlands and reservoirs along approximately 20km of the river valley. The site qualifies for SPA status by supporting populations of European importance of bittern *Botaurus stellaris*, Gadwall *Anas strepera* and shoveler *Anas clypeata*. The latter two of these populations also qualify the site as a Ramsar wetland of international importance. This site is of ecological value at the International level.

- Epping Forest SSSI and SAC – 4.6km east

Epping Forest is primarily designated as a Special Area of Conservation (SAC) because it contains Atlantic acidophilous beech forests, which are an important habitat type in need of conservation at a European level. A second primary reason for SAC designation is the significant number of stag beetle *Lucanus cervus*, with widespread and frequent records. The site also contains ecologically valuable wet and dry heathland habitats. The Forest is designated as a SSSI because it is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain with a range of high quality wildlife habitats. This site is of ecological value at the International level.

- 4.3 No additional nationally designated statutory wildlife sites occur within 2km of the development.

Non-statutorily Designated Sites

- 4.4 The desk-based information search provided by GIGL highlights the presence of several non-statutory Sites of Importance for Nature Conservation (SINCs) located within the data search area. These sites are identified by the Greater London Authority on account of their flora and fauna and are graded on the basis of their importance to a particular defined geographic area in the following order of importance:

Metropolitan → Borough Grade I → Borough Grade II → Local

- 4.5 The SINC's within 1km, as listed below, are considered to be of ecological value at the Local or Borough level as per their grading, which has been made in accordance with published evaluation criteria (see Appendix B):

- Tottenham Cemetery, All Hallows Churchyard and Bruce Castle Park – 0.37km west
This Borough Grade II site is an area of open parkland with veteran oak trees, also containing a pond and stream.
- Tottenham Hale to Northumberland Park Railsides – 0.75km east
A Borough Grade II site comprising linear vegetated habitat alongside the railway. Habitats are dominated by rough grassland and scrub with scattered trees, which may function as a valuable wildlife movement corridor.
- Marsh Lane Allotments – 0.88km east
A site of Local importance, comprising very well-used allotments with scattered fruit trees and climbers providing a resource for wildlife.
- Bruce Grove Wood – 0.91km south
A small site of Local importance with a range of habitats including overgrown allotments, secondary woodland and mature planted trees.
- Tottenham Marshes – 0.93km southeast
This Borough Grade I site consists of a large expanse of rough grassland with damp areas, a brook, and smaller areas of scrub and tall herbs supporting a diverse flora, of value for wildlife including birds and invertebrates.
- Pymmes Park – 0.98km north
A site of Local importance designated for its large lake which has a reasonable marginal flora and a good range of common breeding wildfowl.

Site Description

Habitats/Flora

- 4.6 The majority of land within the survey area is dense urban development comprising numerous buildings surrounded by hardstanding. To the south of Paxton Road, which bisects the site, are the existing football stadium and a range of commercial and residential properties. To the north of Paxton Road are a range of light industrial buildings within the Wingate, Gibson Place and Northumberland Park trading estates, and additional residential and commercial properties. There is very little vegetation at the site, limited to areas of grassland within small gardens, very small areas of tall ruderals and a few scattered mature trees. Habitats are described below and illustrated on the Habitats Plan (CSA/1037/100) included in Appendix D.

Buildings and hardstanding

- 4.7 The vast majority of the site comprises buildings and hardstanding. The southern area of the site is dominated by the football stadium and associated car park. The central area of the site, immediately to the north of Paxton Road comprises a large hard-surfaced car park. Large buildings in light industrial use dominate approximately the northern half of the site. A range of buildings occur along Tottenham High Road in the west of the site, including shops, pubs, offices and dwellings. In the northeast of the site is a terrace of red brick houses along Worcester Avenue.

Amenity grassland

- 4.8 Gardens containing amenity grassland lawns occur to the rear of several properties that have frontages along Tottenham High Road and Worcester Avenue. Whilst individual gardens were not accessed, views from adjacent land indicate that the majority are closely mown and have the appearance of typical seed sown lawns. None of the grassland is of natural or semi-natural origin and no neglected areas with rank grassland were observed.

Tall ruderal and colonising vegetation

- 4.9 A few small patches of tall ruderal dominated vegetation occur at the site, generally dominated by common nettle *Urtica dioica*, or Japanese knotweed *Fallopia japonica*. A range of additional tall ruderals and other plant species are sparsely distributed across the site, typically growing at the edges of hardstanding areas. Species recorded in such locations include broadleaved dock *Rumex obtusifolius*, ragwort *Senecio* sp., creeping thistle, prickly lettuce *Lactuca serriola*, ivy-leaved toadflax *Cymbalaria muralis*, annual meadow-grass *Poa annua*, wall barley and barren brome *Anisantha sterilis*.

Trees

- 4.10 A small number of scattered mature trees occur across the site. To the north of Paxton Road trees include several false-acacia *Robinia pseudoacacia* and beech *Fagus sylvatica* associated with Northumberland Park in the northeast of the site and a horse chestnut *Aesculus hippocastanum* within Gibson Place in the northwest. To the south of Paxton Road are several pavement trees along the western, southern and eastern boundaries, including London Plane *Platanus x hispanica*, cherry *Prunus* sp., sycamore *Acer pseudoplatanus* and horse chestnut.

Fauna

Bats

- 4.11 Several local bat records collated by the London Bat Group have been provided by GiGL for the data search area (see Appendix B). These include a single record of a roost, of pipistrelle *Pipistrellus* sp. bats, from 442m west of the centre of the development site. Sightings of pipistrelle are recorded from 313m west, 1059m northeast and 1422m southeast of the site. The latter of these locations to the southeast also has records of serotine *Eptesicus serotinus* and noctule *Nyctalus noctula* bats, and it is assumed that this corresponds with habitat along the River Lee corridor, which is likely to be valuable for bat foraging.

- 4.12 The site contains very little vegetation and opportunities for bat foraging are considered to be very low. Whilst this reduces the likelihood that bats roost at the site, it is possible for bats to roost some distance from their foraging habitat. A brief assessment of the potential for the buildings at the site to support bat roosts was undertaken alongside the Phase 1 survey. The buildings that were considered to offer significant potential for bat roosting are shown on the Bat Survey Transect Route Plan (CSA/1037/101) within Appendix C. These largely correspond with the older brick built buildings at the site, particularly those which appear to contain roof voids. Many of the buildings considered to have no significant bat roosting potential are the industrial structures.
- 4.13 All of the mature trees at the site are along or adjacent to roads/pavements, or within carparks, and as a result they are managed closely, with little deadwood. There are a few exceptions such as two false-acacia in the northeast of the site that exhibit some cracks and splits that could potentially be exploited by roosting bats.
- 4.14 In order to explore the potential for bat roosts to occur at the site several bat activity surveys were undertaken during the optimal bat survey period (May-August). Surveyors walked transects around the boundaries of the site, which largely coincide with those buildings and trees considered to have greatest bat potential. The survey aimed to identify levels and patterns of bat activity around the site in order to assess the likelihood that bat roosts may occur. The results of the bat activity surveys are provided within Appendix E and are summarised below.
- 4.15 The bat activity surveys recorded very low levels of bat activity at the site. The first dusk survey on 26 June 2008 recorded a single noctule bat, commuting past the north of the site. On the following dawn survey foraging by common pipistrelle bats was recorded, with three encounters with bats foraging mainly over off-site trees and gardens adjacent to the southeast corner of the site. Three noctule bats were seen between 04.14 - 04.18, which appeared to be commuting from the east of the site to a location to the northwest.
- 4.16 The level of bat activity was higher on the surveys on 08/09 July 2008, although still considered low. Several noctule bats were detected during both surveys, several of which were seen flying high near the northern site boundary. These bats were probably flying from roosts to the north or west of the site to foraging areas to the south or east. A single noctule was sighted on the dusk survey commuting south along the eastern edge of the stadium. On the dawn survey two noctule flew south past the western edge of the stadium and two were recorded flying back in the opposite direction 15 minutes later, which would be consistent with a roost occurring somewhere to the north or west of the site. There were no extended contacts with noctule, suggesting that the site is not of foraging value for this species. Common pipistrelle bats were also encountered on both surveys. The majority of contacts with this species were brief, although a bat foraged for

around 5 minutes over habitats immediately to the southeast of the site from 21.49-21.54 on the dusk survey.

- 4.17 Overall, the survey work recorded very low levels of bat activity at the site, limited to a small number of passes by noctule bats. Several additional noctule passes and very low levels of common pipistrelle foraging were detected from land adjacent to the site boundary. At no point during any of the four surveys was any behaviour observed to suggest that bats roost at the site or use it for any significant foraging.

Other notable mammals

- 4.18 The UK and London BAP Priority species of hedgehog *Erinaceus europaeus* has been recorded locally, with the closest record originating from 512m southwest of the centre of the site. The very small areas of garden present at the site are unlikely to be of any significant value to this species. The NBN Gateway search returned records of badger *Meles meles*, otter *Lutra lutra* and water vole *Arvicola terrestris* from the 10km grid square that contains the site. No opportunities for these protected mammal species are considered to occur at the site.

Birds

- 4.19 GiGL have provided a number of records of protected and notable bird species for the data search area. These include species specially protected under Schedule 1 of the Wildlife and Countryside Act 1981 such as hobby *Falco subbuteo*, kingfisher *Alcedo atthis*, black redstart *Phoenicurus ochruros*, fieldfare *Turdus pilaris* and redwing *Turdus iliacus*.
- 4.20 The highly urbanised nature of the site reduces its value to bird species, and no habitats are present that would typically support any of the Schedule 1 species listed above. Black redstart are known to breed within the Lee Valley around 1.2km southeast of the site but GiGL have confirmed that that the development site does not fall within a 'known key area' for this species. Black redstart is typically associated with sparsely vegetated brownfield land with areas of stony ground, often close to water. Such habitats do not occur on the site so opportunities for this species are considered to be negligible.
- 4.21 The small proportion of the site comprising trees and residential gardens is likely to be used by bird species commonly associated with urban gardens. These may include house sparrow *Passer domesticus* and starling *Sturnus vulgaris*, which are both listed within the London and UK BAP due to recent dramatic population declines. Several of the buildings at the site could be used for nesting by these species and a range of other common birds. This includes kestrel *Falco tinnunculus*, for which there are anecdotal reports of nesting from within the football stadium.

Reptiles

- 4.22 The NBN Gateway search returned records of the four widespread British reptile species (slow-worm *Anguis fragilis*, common lizard *Lacerta vivipara*, grass snake *Natrix natrix* and adder *Vipera berus*) from the 10km grid square that contains the

site. The habitats present within the site are not considered to be suitable for reptile species.

Amphibians

- 4.23 A record of common toad *Bufo bufo*, a UK and London BAP Priority species, have been provided by GiGL for a location 1327m northwest of the centre of the site. Records of common frog *Rana temporaria* and smooth newt *Triturus vulgaris* also occur within the data search area, all from over 500m from the site centre. The NBN Gateway search returned records great crested newt *Triturus cristatus* from the 10km grid square that contains the site. No waterbodies or suitable terrestrial habitats that could potentially support populations of amphibians occur at the site.

Invertebrates

- 4.24 Several records of two London and National BAP moth species; blood-vein *Timandra comae* and cinnabar *Tyria jacobaeae*, originate from 1282m southeast of the centre of the site. The larval foodplants of these species, such as docks and ragwort do not occur at the site in any significant quantity and opportunities for notable invertebrate species are considered to be negligible.

Evaluation of Ecological Features

- 4.25 With reference to the evaluation criteria set out in the methodology, a range of factors has to be considered when evaluating a site's features. A checklist of potentially relevant factors, as set out in the IEEM evaluation guidelines, is shown in Table 1. The features of this site are considered against each of these factors.

Factors	Status	Notes
Designated Sites and Features	Absent	No internationally important sites cover the proposed development site. Lee Valley SPA & Epping Forest SAC occur within 5km.
• Internationally important sites		
• Nationally important sites	Absent	No statutory sites cover the proposed development site. Walthamstow Reservoirs SSSI occurs at 1.2km.
• Sites of lower level importance	Absent	No non-statutory wildlife sites cover the site. Six SINC's occur within 1km.
Tree Preservation Orders	Present	Several of the mature trees within the north of the site are understood to be covered by TPOs.
Hedgerow Regulations	Absent	-
Biodiversity Value		-
• Habitat designations	Absent	
• Non designated habitats of value or potential value	Absent	
• HAPs	Present	There is a HAP for Built Structures within the London BAP and a HAP for Private Gardens within the London and Haringey BAPs.
• Ancient Woodland	Absent	-
• Protected species	Potentially present	Nesting birds are likely to occur at the site.

• Rare species	Absent	-
• Species records	Absent	None for the site, although a range of records have been provided from within 1.5km.
• SAP species	Potentially present	The UK and London BAP has SAPs for house sparrow, starling and song thrush.
Large populations/important assemblages of species	Absent	-
Injurious and legally controlled weeds	Present	Japanese knotweed has been identified at the site
Potential Value	Absent	-
Secondary or supporting value	Absent	-
Social/community value	Absent	-
Economic value	Absent	-
Legal issues	Present	Protected species issues are discussed herein.
Multi-functional features	Absent	-

4.26 The scale of value of the several potential ecological features at the site has been considered to determine their significance, as follows. Any ecological feature of value at the Local scale or above is considered to be a Valued Ecological Receptor (VER).

- *Bats* - At no point during any of the four surveys was any behaviour observed to suggest that bats roost at the site, use it for significant foraging or rely upon any specific feature as a flight line. Bats are not therefore considered to represent a VER.
- *Nesting birds* - The highly urbanised nature of the site reduces its value to bird species, and no habitats are identified that would typically support any notable species. Trees and buildings at the site are likely to be used for nesting by common bird species, including kestrel that is reported to nest within the stadium. Nesting by common bird species is considered to be of ecological value at the site/ immediate zone of influence level only.
- *Mature trees* - A small number of scattered mature trees occur across the site. The majority of these are non-native street trees planted in disturbed locations along roads. Whilst they offer some opportunities for wildlife at the site and within the immediate zone of influence, these trees are not considered to be of significant ecological value at any greater level.
- *Wildlife sites* - All statutory and non-statutory wildlife sites are notified for ecological value at the Local level or above. All of the wildlife sites discussed in sections 4.1 - 4.5 qualify as VERs, with the scale of value ranging from Local - International according to the site designations, which follow published evaluation criteria.

5.0 Discussion and Recommendations

Potential Impacts and Mitigation

Impacts on wildlife sites

- 5.1 Walthamstow Reservoirs is the only unit of Lee Valley SPA within 10km, at approximately 1.2km. Consultation with Natural England confirms that the SSSI is only notified for one of the bird species that the SPA is designated for, namely a nationally significant number of overwintering shoveler. Several additional wetland bird species also occur at nationally significant numbers, and gadwall occur in smaller numbers. Given the distance from the development, no construction effects are predicted to the SPA/SSSI and no significant operational effects are predicted, as discussed below.
- 5.2 The reservoirs within the SSSI are owned and managed by Thames Water with public access by permit only. The wetland bird populations using the site are not particularly vulnerable to disturbance from the current use of the site by anglers and birdwatchers. Any increase in visitor numbers from new residents of the development is predicted to be minor and unlikely to have a significant effect on shoveler, gadwall or any other wildfowl species at the SPA/SSSI.
- 5.3 The Lee Valley forms a wetland corridor through the densely urbanised northern areas of Greater London, which has a roughly north-south orientation and is likely to provide a topographical feature for bird migration. Shoveler, gadwall and other wildfowl migrate to Walthamstow Reservoirs SSSI from summer breeding grounds in northern and eastern Europe. The development site occurs over 1km to the northwest of the SSSI and river corridor in a densely developed area. It is considered highly unlikely that the construction of tall buildings and the use of artificial light sources at the development site would have any significant effect on the migratory routes of bird species using the SPA. In summary, no effects to the integrity of the SPA/SSSI are predicted as a result of this development.
- 5.4 Epping Forest SAC/SSSI is primarily notified for its woodland habitat types and population of stag beetle, although it also contains smaller areas of internationally important heathland habitats. The SAC/SSSI is approximately 4.6km from the proposed development at its closest point, and is a large linear site extending over 12km in length. At this distance, no construction impacts are predicted and the increase in visitor numbers to the SAC/SSSI contributed by residents of the new development is considered to be negligible. No significant effects to the habitats or species that the SAC/SSSI is designated for are predicted as a result of this development.

Non-statutorily Designated Sites

- 5.5 No non-statutory wildlife sites cover the development site or occur on adjacent land and no impacts from the construction phase are predicted.
- 5.6 The development is likely to increase visitor numbers to the closest SINC of Tottenham Cemetery, All Hallows Churchyard and Bruce Castle Park. This site

comprises open parkland that is reportedly visited by over 100,000 people per year. With this number of visitors the SINC is not considered to contain any wildlife habitats or species that are particularly sensitive to disturbance and the potential minor increase in recreational use from the new development is considered to have a negligible effect on the ecological value of the site.

- 5.7 Tottenham Marshes SINC and Pymmes Park SINC are also accessible to the public. Both sites occur over 0.9km from the development site and have existing management to provide access for significant numbers of visitors. No effects to the ecological value of these SINC are predicted from the development.
- 5.8 There is no public access to the Tottenham Hale to Northumberland Park Railsides SINC, Marsh Lane Allotments SINC and Bruce Grove Wood SINC and no effects from the development are likely.

Habitats/Flora

- 5.9 The Phase 1 survey has revealed that the vast majority of the site comprises buildings and hardstanding, with very limited areas of habitat present. Habitats include short mown lawns, garden shrubs and small patches of tall ruderal, none of which have significant ecological value.
- 5.10 The scattered mature trees at the site do not qualify as a VER, however, they do provide opportunities for local wildlife and they represent a declining resource that cannot be readily replaced. It is therefore recommended that mature trees be retained alongside the new development wherever possible. Retained trees and their root systems should be protected from damage throughout the development in accordance with guidance provided by British Standard 5837:2005 'Trees in Relation to Construction'. If felling of mature trees is necessary to facilitate development it is recommended that a greater number of native trees be incorporated within the new scheme as a compensatory measure.

Bats

- 5.11 The site contains numerous buildings, the majority of which are large industrial units that are not considered to have significant potential for bats. There are several buildings and a small number of trees with physical features that exhibit some potential to support bat roosts. However, the heavily urbanised nature of the site results in a lack of suitable foraging habitat and high light levels, which significantly reduces the likelihood that a roost occurs.
- 5.12 The bat activity survey work utilised transects around the boundary, and through the centre of the site, in order to "box in" the site and allow bat movements in or out of the site to be picked up. No evidence was seen to suggest that any roosts occur and activity levels recorded were so low that the entire site appears to be of negligible interest to bats. Surveyors did not continually watch individual buildings or trees for emerging or returning bats, however it is considered that the findings of the activity surveys are sufficient to conclude that a bat roost is unlikely to occur at the site. No further bat survey work is therefore considered to be necessary.

- 5.13 Noctule bats were recorded commuting past the site, generally flying in the open, high above buildings. From the general direction that bats were seen flying there is likely to be a roost to the north or west of the site, which could potentially be several kilometres away. The noctule bats observed did not appear to be following regular flight lines across the site, although the single noctule sighted flying along the edge of the stadium may have been exploiting the relatively dark conditions in this location. The replacement of the current stadium and associated development could result in increased artificial light levels at the site. This may alter the routes that individual bats adopt, particularly when the stadium is in use. However, the effect on the noctule population is not considered to be significant as these bats are adaptable in their choice of commuting route and are clearly tolerant of the significant artificial light levels that occur throughout the urban areas surrounding the site.

Nesting birds

- 5.14 Buildings and vegetation at the site are used for nesting by bird species, including kestrels within the stadium itself. All wild birds, their nests and eggs are protected under subsection 1(1) of the Wildlife and Countryside Act 1981. It is an offence to kill or injure any wild bird, to take or destroy their eggs, or to take, damage or destroy their nests while in use or being built.
- 5.15 The existing stadium is scheduled for demolition between May-August 2012, at the end of the football season, but during a period when birds may be nesting within the stadium. It is recommended that measures be taken to minimise the potential for active birds nests to be present at this time, to be informed by bird survey work to be undertaken in March – June 2011.
- 5.16 Bird survey work would record the location/s within the stadium used by kestrel for nesting and also locations used for breeding by other bird species. At the end of the breeding season in 2011, once all of the nestlings have fledged, the nest locations and any other obvious nesting opportunities would be made unsuitable for use the following year. This would be achieved through the implementation of various bird proofing measures as appropriate, such as netting over features to prevent access and the use of non-harmful spikes to deter perching and nesting.
- 5.17 It is recommended that several kestrel nest boxes be erected at the site, if possible within the stands of the new stadium prior to demolition of the old stadium, to provide continuous opportunities for kestrel to nest at the site.

Non-native invasive species

- 5.18 A small quantity of Japanese knotweed occurs in the northwest of the site, which is an invasive non-native plant, capable of growing through hard surfaces such as tarmac and concrete. The species is listed on Schedule 9 and subject to section 14 of the Wildlife and Countryside Act 1981, which makes it an offence to plant, or cause this species to grow, in the wild. Failure to address this issue could result in spreading the plant both throughout the site during construction and off-site within contaminated material, which could cause significant future structural damage and would represent an offence under the Act.

- 5.19 It is recommended that the small patch of Japanese knotweed be cleared prior to demolition of buildings or any other development works within the Gibson Place industrial area of the site. A specialist contractor should be commissioned to eradicate the plant and dispose of any contaminated material by an appropriate method to ensure that legal obligations are met and that no fragments of material remain to allow the plant to regenerate.

Ecological Enhancement

- 5.20 The provision of new habitats and/or features for wildlife could provide biodiversity gains, in line with guidance within PPS9, London Plan Policy 3D.14, Haringey UDP policies OS11 and UD2, and draft SPG 8d.
- 5.21 The residential and hotel development in the south of the site will create numerous roof and terrace areas that will contain a mosaic of different green/brown roof types to offer a significant biodiversity enhancement, as shown on the South Building Green Roof Plan (Drawing No. L1011). This includes significant areas of extensive biodiverse/brown roof comprising varying depths of a range of substrates, such as shingle, crushed aggregate, soils and sandy gravel. The majority of these areas will be allowed to colonise naturally from local seed sources. Extensive green roofs will also be provided on areas that are overlooked by new residents. These will have a substrate base and will be planted with sedums and a range of native wildflower plugs. A range of public and semi-public terraces and roof gardens will also be created with small multi-stemmed trees and raised planters to include native species.
- 5.22 An extensive green screen will be constructed to screen the western end of the commercial development in the north of the site. This will be planted with a number of different climbing plant species, including some native species (e.g. ivy) and other flowering species. As these plants develop and cover the screen they will provide new habitat for invertebrates, and therefore also provide a potential feeding resource for local birds and possibly bats. A total of ten bird boxes will be associated with the green screen, targeting a range of small common bird species such as house sparrow and tit species.
- 5.23 New tree and shrub planting will be included within the landscape scheme for the site. The nature of this development mean that high levels of pedestrian traffic and the demands of CCTV coverage impose constraints on the extent and type of planting that can be provided. However, the planting of native species of local provenance and other shrub species of known benefit to wildlife will be provided where possible. These could include nectar-rich species to attract invertebrates and fruit bearing species to provide food for birds.
- 5.24 There are reports of kestrel using the existing stadium at the site, and replacement nesting opportunities will be provided. Two new kestrel nest boxes will be provided in appropriate locations on new buildings at the site, to be informed by the bird survey work to be undertaken in spring 2011. If possible these should be provided within the stands of the new stadium in sheltered

locations similar to the existing nest sites. Additional bird boxes could also be provided to offer new potential nesting sites, with a wide range of suitable products available for buildings such as sparrow terraces and swift boxes. The final selection of boxes should take into account the species recorded from the proposed nesting bird survey.

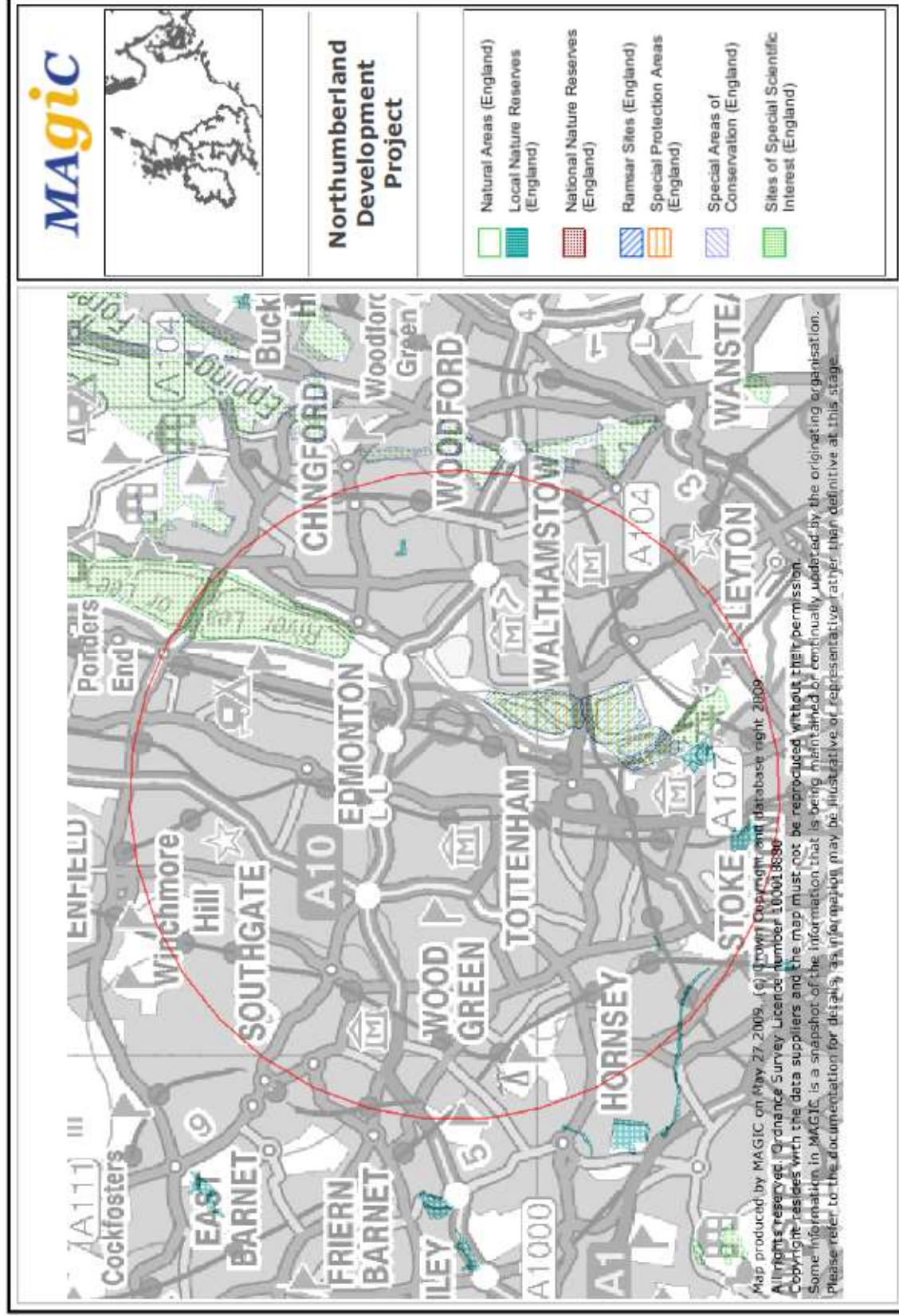
- 5.25 The results of the bat surveys suggest that the site is of no real significance to bats, and siting bat boxes across the majority of the new development is unlikely to be successful at attracting bats. However, sporadic common pipistrelle foraging was recorded around trees in the southeast corner of the site. New tree planting is proposed for this area and so bat boxes located in this corner may have the greatest chance of being occupied. Therefore, four bat boxes will be fixed in appropriate locations along the eastern wall of the residential block close to the junction of Worcester Avenue and Park Lane.

6.0 Conclusion

- 6.1 The majority of this site comprises buildings and hardstanding of no significant ecological value. No species or habitats of significant ecological value are considered to be present at the site. The potential for impacts to local wildlife sites, including Lee Valley SPA, have been considered and no potentially significant effects are predicted from the development. Legal issues concerning nesting birds and Japanese knotweed have been identified and appropriate recommendations made. Potential ecological enhancement measures have also been discussed.
- 6.2 It is anticipated that the redevelopment of this site may proceed without any significant adverse ecological impacts.

APPENDIX A

MAGIC Database Site Check Report and Plan



Site Check Report

Report generated on May 27 2009.

You clicked on the point:
 Grid Ref: **TQ 340 912**
 Full Grid Ref: **534014 , 191277**

The following features have been found within 5,000 metres of your search point:

Counties, Metropolitan Districts and Unitary Authorities (GB)

Geographic Level	Name
GREATER LONDON AUTHORITY	GREATER LONDON

NUTS1 - Government Office Regions (GB)

Hotlink	Name	Reference
http://www.statistics.gov.uk/geography/nuts_1on.asp	LONDON	UK1

Natural Areas (England)

Hotlink	Name	Reference
http://www.naturalareas.naturalengland.org.uk/science/natural/na_details.asp?na_id=66&s=&r=6	LONDON BASIN	66

Local Nature Reserves (England)

Name	Reference
PARKLAND WALK	1009064
SPRINGFIELD PARK	1009350
AINSLIE WOOD	1009359
ABNEY PARK CEMETERY	1008740
RAILWAY FIELDS	1009092

National Nature Reserves (England)

There are no features within your search area.

Ramsar Sites (England)

Name	Reference
LEE VALLEY	UK11034

Special Protection Areas (England)

Name	Reference
LEE VALLEY	UK0012111

Special Areas of Conservation (England)

Name	Reference
EPPING FOREST	UK0012720

Sites of Special Scientific Interest (England)

Citation	Name	Reference
1004304	WALTHAMSTOW RESERVOIRS	1000135
1001814	EPPING FOREST	1001669
1001912	CHINGFORD RESERVOIRS	1000382

[1003054](#) WALTHAMSTOW MARSHES 1000343

To save the report, select "Save" or "Save As" from the File menu. You should save the file with a .html extension and give it a name of your choice.

You can then open your report using your web browser software.

[Print Report](#) | [Close Window](#)

APPENDIX B

Biological Data Search Responses from
Greenspace Information for Greater London (GiGL)



Greenspace Information for Greater London
the open space and biodiversity records centre

An Ecological Data Search for Haringey, North London

Produced by
Lauren Alexander
Senior Information Officer

Greenspace Information for Greater London
(GiGL)

01 May 08

On behalf of
CSa Environmental Planning

Report reference 08/176

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1.0 Introduction

An ecological data search for Haringey, North London and surrounding land on behalf of CSa Environmental Planning.

The following report was compiled by Greenspace Information for Greater London (GiGL) on behalf of CSa Environmental Planning, to provide ecological information for the above site for a planning application. This report may include information on statutory sites, non-statutory sites, species records, habitat or open space information held by GiGL, as requested for the above search area. The boundaries of this search area are defined in the maps in Annex A and lie within the London Borough(s) of Enfield, Haringey and Waltham Forest.

2.0 Non-Statutory Sites

A desk-based search shows that there are 9 SINCs and no LWT reserves within the search area.

2.1 Sites of Importance for Nature Conservation

Introduction

Sites of Importance for Nature Conservation (SINCs) are non-statutory and are identified by the Greater London Authority on account of their flora and fauna. They are of Greater London or regional importance. For further explanations of the designations and a list of the documents that most recently define the sites please see the "Supporting Information" annex.

The Sites of Importance for Nature Conservation have been identified since 1986 using procedures that have now been adopted by the Mayor of London. They are recommended for protection in planning. The boundaries and site grades reflect the most recent consideration of each site, details of which are available from the Greater London Authority. Note that boundaries and grades may change as new information becomes available.

Citations

Citations currently available for SINCs within the search area can be seen on the following pages.

Please note that the content of SINC citations is reviewed periodically and that species referred to in the citations may not be present on site today. Citations may have been written based on data not held by GiGL.