



Historic England

Mr Samuel Uff
London Borough of Haringey
Level 6 River Park House
225 High Road
Wood Green
London
N22 8HQ

Direct Dial: 020 7973 3765

Our ref: P01564854

7 September 2023

Dear Mr Uff

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**TOTTENHAM HOTSPUR STADIUM, 748 HIGH ROAD, TOTTENHAM, LONDON N17
0AL
Application No. HGY/2023/2137**

Thank you for your letter of 18 August 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England maintained a strong objection to the consented 2015 scheme for the redevelopment of the stadium site to which amendments are now proposed. Aspects of the scheme, including the radically altered setting of a Grade II listed building and demolition of several locally listed buildings within the conservation area, have now been implemented despite our view that this would cause substantial harm.

The proposal seeks to increase the height of the hotel tower by 6 storeys (27m) from 23 to 29 storeys (127.2m AOD). Whilst there is an existing planning consent and we acknowledge the recent appeal decision on a neighbouring site for towers of 32, 29 and 27 storeys, we remain of the view that harm arises from the scale of the new development which fails to respond appropriately to the existing grain and character of the local conservation areas.

In determining this application for a minor material amendment to the approved scheme, we remind you of your duties under the 1990 Act to give 'special regard' to the setting of listed buildings and conservation areas and that 'great weight' be given to the conservation of heritage assets in accordance with the NPPF. You must also be satisfied that the public benefits, including heritage benefits, are real and cannot be delivered by any other means.



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Historic England Advice

Our statutory remit is the impact of the proposals on the historic environment. Our advice below is based on an understanding of the historic environment affected by the proposals, and an assessment within the context of national planning policy as to whether the proposals harm, retain or enhance this significance.

Planning history of the site

In 2010, Historic England accepted the justification put forward for the redevelopment of the existing stadium and the consequent harm to the historic environment of North Tottenham as we acknowledged the benefits arising from retaining the football club in its historic location. We judged that this benefit, alongside others, could outweigh the harm and therefore supported the proposals which delivered this aim. This scheme was consented by LB Haringey.

In 2015, we considered further proposals for the redevelopment of the existing stadium and provided detailed comments both at pre-application and application stage following the presentation of the scheme by the applicants to our London Advisory Committee in June of that year. We raised a number of concerns including:

- the demolition of three locally listed buildings that made a positive contribution to the special character and appearance of the North Tottenham Conservation Area
- development immediately adjacent and to the sides and rear of Grade II listed Warmington House would harm its setting and the contribution this makes to the significance of the building as a formerly detached villa
- impacts on the settings of the North Tottenham Conservation Area and the Bruce Castle Conservation Area, where the proposed hotel (23 storeys) and residential buildings (between 16 and 32 storeys) would dominate a skyline in areas characterised by a traditional building scale.

We maintained that the alteration to the setting of the Grade II listed building and the demolition of locally listed buildings would result in substantial harm both to the listed building and the conservation areas. We also considered that the scale of the new hotel and residential towers would cause harm as they failed to respond appropriately to the existing grain and character of the local conservation areas.

Historic England was unconvinced that the proposed scheme would deliver additional public benefits over and above those of the 2010 consented scheme or that the substantial harm to the historic environment caused by the proposals was clearly justified as required in the NPPF. Historic England has accordingly raised strong objections to the proposals and urged your council to refuse them. However, permission was granted by LB Haringey on 15th April 2016.



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This consent has been partially implemented and the new stadium constructed. The unlisted buildings have been lost and the setting of the Grade II building significantly altered.

In November 2022, planning consent for residential towers of 32, 29 and 27 storeys was granted on appeal on a neighbouring allocated site to the north-west of the football stadium. Known as the Goods Yard and Depot, this site also belongs to the football club. I note that the original decision to refuse the scheme was against the advice of officers.

Significance of the historic environment

Our previous letters of 3 July and 20 November 2015 detail the significance of the area.

In summary, North Tottenham's character is derived from the ancient linear form of Tottenham High Road and the historic buildings that line it. Most of the High Road is lined with commercial premises and is therefore, characterised by intensively developed, high density urban environments but there are examples of larger institutional buildings. There are good surviving examples of buildings dating from the 18th and 19th centuries including Georgian houses and Victorian shopping parades. Roads flanking the High Road are mostly residential characterised by a more finely grained, domestic scale and greater uniformity.

Bruce Grove is essentially a late-Victorian townscape prompted by the arrival of the railway in 1872. There is an emphasis on commercial uses, such as shopping parades, and it is low in height and scale with many of its buildings relatively uniform at three-storeys.

Proposed amendments and their impact

The current scheme seeks an increase in height of the hotel building (plot 3) on the stadium site from 23 to 29 storeys, an increase of 27m to 127.2 AOD. The new tower will provide 27,378 sqm floorspace for hotel and residential use, an increase from the approved 19,835 sqm.

The design of the tower has also been modified with changes to the building form and layout. The hotel building will stand to the south of the stadium and is positioned within the conservation area as per the original 2015 application.

The building will be greatly out of scale with the much lower heights of historic buildings within the North Tottenham and Bruce Grove Conservation Areas and which contribute positively to the significance of the conservation area. This extreme contrast





in height would be very noticeable in views within and beyond the conservation area boundaries, resulting in the new tower visually dominating the traditional built form that contributes to the character of the conservation area.

Relevant National and Regional Planning Policy

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2021 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.195). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.199). Clear and convincing justification should be provided for any harm caused (para.200), and any harm should be weighed against the public benefits of the scheme (para.202).

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets.

The Tottenham Area Action Plan (TAAP) establishes the local spatial planning framework for the area and details the growth objectives for the area. The site is within the Tottenham Hotspur Stadium site allocation (NT7) for which the TAPP provides the indicative development capacity for 285 net new homes and 18,830sqm of hotel floorspace. Policies DM12 and DM13 of the Local Plan seek to protect the historic environment including the setting of designated heritage assets.

Historic England's position

Historic England remains deeply concerned about the harm to the historic environment resulting from the impacts of the redevelopment of Tottenham Football Stadium.

We acknowledge that the consented scheme has been partially implemented and that this is a material consideration. We also note the recent planning appeal decision on the Goods Yard and the Depot site.

However, we remain of the view that the hotel tower will cause harm, which we



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identified in our response to the original consultation. It will dominate a skyline currently characterised by a traditional building scale and cause visual harm in some views from within the North Tottenham Conservation Area and the Bruce Castle Conservation Area. The proposed additional height will exacerbate this harm.

We, therefore, remind you of your statutory duties under the 1990 Act and in applying the NPPF policies as set out above. We draw your attention to the need to have 'special regard' for the historic environment in determining this application and of the impact of the additional height, scale and mass of the proposals. We also draw your attention to additional public benefits that are derived from this scheme should be assessed to ensure that they are real and cannot be delivered by other means.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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Inspector of Historic Buildings and Areas

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