

# **APPENDIX 16 | APPEAL HERITAGE AND DESIGN STATEMENT**

**The Grove Lawn Tennis Club, Cascade Avenue, Haringey**

## **APPENDIX 16 - Heritage and Design Statement**

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on behalf of ROK One Enterprises Ltd

**Appeal Reference:** APP/Y5420/W/24/3356480

**February 2025**

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## **1.0 INTRODUCTION**

- 1.1 Citydesigner was appointed by ROK One Enterprises Ltd in 2021 to advise on design, and the heritage sensitivities arising from their development proposals for the former Grove Lawn Tennis Club, Cascade Avenue, Hornsey, London, N10 3PS. Our initial advice, based on a detailed study of the site, and the significance of the Rookfield Estate Conservation Area ('Rookfield CA or CA') in which the appeal site lies, prompted the appointment of Adam Architecture as architects for the scheme.
- 1.2 We worked with Nigel Anderson, Director of Adam Architecture, and his design team from the early stages of the project. We introduced him to the townscape and heritage sensitivities which needed to be taken into account in designing a development for the site. We also contributed to the planning application [Ref: HGY/2023/0733] through the production of the Heritage, Townscape and Visual Assessment (HTVA), dated February 2023.
- 1.4 This Heritage and Design Statement is an Appendix to the appellant's revised Statement of Case (SoC) and addresses the matters raised in reason for refusal 2 as set out in London Borough of Haringey's (LBH) Notice of Refusal Decision of May 2024. It enlarges upon the professional assessment of the scheme within the HTVA and subsequent note dated October 2023 ('Response to LBH Heritage Impact Assessment') which responds to the Heritage Impact Assessment prepared by Revive & Tailor on behalf of LBH dated 18 September 2023 ('LBH Heritage Impact Assessment').

## 2.0 LBH'S REASONS FOR REFUSAL

2.1 Reason for refusal '2', set out in LBH's decision notice states:

*"2. The proposed development by reason of its siting, scale and bulk would introduce a dominant and discordant form of development, detrimental to the verdant, open and spacious qualities of the site and its spatial relationship with surrounding buildings, overall street scene and the contribution the site makes to the special interest of the Rookfield Conservation Area, contrary to Policies D3 and HC1 of the London Plan 2021, Policy SP11 of Haringey's Local Plan Strategic Policies (2017) and Policies DM1 and DM7 of the Haringey Development Management DPD (2017)."*

2.2 Of the policies listed in this reason for refusal those relating to high quality design (policies D3, SP11 and DM1) and heritage (policy HC1) are relevant to this Statement.

2.3 Addressing the matters raised in the reason for refusal, it is evident that a detailed understanding of the quality of the design is a critical matter. The importance of design quality is supported by the current NPPF (paragraph 131) and Historic England (HE) guidance (paragraph 39 of Good Practice Advice Note 3).

2.4 In this case, LBH's failure to recognise the outstanding design quality of the appeal scheme, leads them to believe mistakenly that the siting, scale and bulk of the appeal scheme will result in a dominant and discordant form of development. Their own Heritage Impact Assessment contradicts this.

2.5 It is important to take a positive approach to new architecture and sensitive change in the townscape where new high quality buildings designed by skilled architects are to be seen and enjoyed as additions to the townscape. They aim to be the heritage of tomorrow, but this only arises through a rigorous approach to design quality.

- 2.6 Nigel Anderson, the lead designer of the appeal scheme at Adam Architecture, a practice of high repute in traditional architecture, has fully understood the context of the site in his architectural response. He recognised that the site had the potential to accommodate the proposals, that it needed to connect with its immediate surroundings, but that it also needed to respond to its urban environment. Mr Anderson's artistic and compositional process of design development is well illustrated in the Design and Access Statement (DAS) and planning drawings.

### **ASSESSMENT OF DESIGN QUALITY**

- 2.7 The design team has carefully tailored the designs of the proposals to sensitively fit in to the Rookfield Estate while optimising the development. Adam Architecture, as architects, are sympathetic to the Arts & Crafts movement in architecture and capable of producing a contemporary version in similar style.
- 2.8 The existing townscape grain surrounding the site has been followed. This consists of street frontages with small front gardens transforming the site from an unkempt green edge to a more domestic one retaining most of the trees. The siting and arrangement of the buildings are 'in the spirit of' the existing modestly expressed residential terraces in the Arts & Crafts style. It follows the existing form of development, scale which largely replicates the neighbouring dwellings, and bulk, which although different is not visible from the street.
- 2.9 The architects' design decisions lead to the likely effect of the proposals being an enhancement on the character and appearance of the conservation area, by infilling a derelict, vacant plot with an animated row of dwellings in keeping with their surroundings.
- 2.10 The illustrations in the DAS show that the proposed houses are not a dominant or discordant form of development nor that it is detrimental to the qualities of the character of its surroundings. It is demonstrably of the highest architectural design quality and has been so designed taking account the character and aesthetics of its surroundings; and would not cause harm to the

character and appearance of the Rookfield CA owing to the care which has been taken in its design. Indeed, for these reasons, it would enhance the character and appearance.

**London Plan policy on design quality:**

- 2.11 The proposals fulfil London Plan Policy D3 (A) and D3 (D.1) by: applying a design-led approach to determine the most appropriate form of development that responds to a site's context, fitting into an existing residential enclave; responding to the local distinctive characteristics of the surrounding built fabric following a similar layout, orientation, scale, appearance and shape to neighbouring properties; and maintaining the existing street hierarchy, building type, forms and proportions of the neighbouring residential properties.

**LBH Strategic and Development Plan policies on design quality:**

- 2.12 The proposals fulfil Policy SP11 by providing the highest standards of design that has carefully considered the distinctive character and aesthetic of its local context and of the wider urban grain.
- 2.13 The proposals are considered to fulfil policy DM1(A) by relating positively to the residential character and structure of neighbouring fabric; enhancing the quality of the area; and contributing to an harmonious whole.
- 2.14 The proposals fulfil LBH Policy DM1(B) by delivering high quality design that matches the distinctive local architectural style, detailing and materials; matches the surrounding urban grain by respecting the neighbouring properties' rhythm, building alignment and plot size; including similarly proportioned open space which enhances the sense of enclosure and providing privacy to neighbouring properties; providing the presence and activity of residential life matching that of its neighbours; reflecting the height, mass, scale and overall aesthetic of surrounding properties and of the wider urban grain; and contributing to the character of the place as an harmonious whole.

### 3.0 OFFICERS' REPORT TO COMMITTEE

- 3.1 The Officers' Report to Committee dated 31 May 2024 deals with 'Heritage Design and Character and Appearance' from paragraphs 5.20 to 5.39. At para. 5.36 it acknowledges that *"the architectural treatments" are "in keeping with prevailing character of the estate"*, but finds that *"the scale of the proposed buildings are incongruous, exacerbated by a proliferation of street facing dormer windows and roof lights. The Council's Heritage Expert considers that the proposed development would result in mid - high level of less than substantial harm to the special interest of the Rookfield Conservation Area. Officers agree with this assessment of harm"*. This does not, however, form a reason for refusal.
- 3.2 It is the appellant's case that:
- (i) the design of the proposals is appropriate as set out in the HTVA (p.13, paras 4.13 and 4.14) and in section 2 of this Statement; and
  - (ii) the effect of the proposals on the special interest of the CA would not amount to 'mid – high level of less than substantial harm' but would instead cause no harm to the character and appearance of the CA. Indeed, the appeal scheme enhances the character and appearance by replacing a poor quality, disused open space, with built form that is in harmony with the existing character and appearance of the CA, thereby extending its qualities. This is illustrated in pages 8, 11-12 and 14, 18 and 26-27 of the DAS (pp.8-27) and the planning drawings.
- 3.3 The Officer's Report (p.2) states at para 2.4 that in the CA and in the immediate context of the development site, *"properties are finished in red brick, with tiled roofs, modest front gardens enclosed by low level brick boundary treatments and deep rear gardens."* The proposals clearly reflect this characterisation of the properties within the CA by proposing similar materiality and layout. This is illustrated in the DAS (pp.13-14 and 18).
- 3.4 The Officer's Report (p.6) states at para 5.34 that *"The facade treatments are in keeping with the Free English Domestic Style of the rest of the estate but the four storey scale of the proposed new buildings is incongruous. The development would completely infill the site,*

*creating a harmful sense of enclosure to the street and the dormer windows and rooflights accentuate the scale of the buildings. The discordant nature of the proposed dwellings is further emphasised by the lack of ability of the front and rear gardens to provide any meaningful soft landscaping. The proposed development is built form and hard surface dominated, conflicting with the garden suburb principles, on which the wider estate is founded.*" These points are addressed fully in our Response to LBH Heritage Impact Assessment but in summary: the dormer windows are a feature of the existing built form and; the appeal buildings are in fact of two storeys plus a roof storey as is the case with many neighbouring buildings. In many cases roof lights have been added in an ad hoc manner. The architects have been sensitive in making their roof lights integral to the design.

- 3.5 The Officer's Report (p.13) states at para 5.35: *"It is considered that the loss of the tennis courts and associated pavilion undermines the original intention of the estate to provide middle class housing, based on garden suburb principles including the provision of sports facilities for use by its residents."* While this is the case in principle, the later phases of the development sacrificed half of the intended area for sports in favour of providing more housing, moving from the original six tennis courts to only three, arguably starting the demise of the use, three being insufficient for their economic sustainability. Section 4 of the appellant's SoC (p.8) deals with the sustainability point in more detail.
- 3.6 The Officer's Report (p.14) states at para 5.39 *"Having carefully considered the less than substantial harm to the Rookfield Conservation Area and the public benefits of the proposed development, it is considered that the public benefits that the scheme delivers do not outweigh the less than substantial harm to Rookfield Conservation Area."* Public benefits are dealt with in section 4 of the main SoC (p.11).
- 3.7 The Officer's Report includes an extract from the LBH Heritage Impact Assessment at para.3.1, point 2, which reads: *"The Proposal does not accord with Haringey Development Management Plan Policy DM 9 which requires development to conserve and enhance the significance of*

*heritage assets. The proposal would cause harm to the character and appearance of the Conservation Area by harming its special interest, derived from the garden suburb inspired middle class housing built in early 20th Century. In NPPF terms, this harm would be at the mid to high level of less than substantial harm. As per the framework, this harm should be given great weight and should be assessed against any public benefits.”* There is no convincing evidence presented to explain the reasons for the finding of harm.

- 3.8 A comprehensive response was prepared by Citydesigner to address points raised in LBH's Heritage Impact Assessment. The 'less than substantial harm' argument put forward in LBH's Heritage Impact Assessment is not supported by their evidence. The design is in fact an enhancement to the character and appearance of the conservation area.
- 3.9 The finding of heritage 'harm' in LBH's Heritage Impact Assessment is only referenced in para 3.1 of the Officer's Report. This finding of 'harm' to the significance of the CA, and accordingly, references to Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 and policy DM9 of the Local Plan, are not included in the reason for refusal 2. However, for the purposes of this Hearing, the proposals are considered against policy DM9 below at paragraph 3.11.
- 3.10 Based on the assessments in the HTVA (p.13, para 4.14), it is considered that the appeal scheme both sustains and enhances the significance of the CA and its setting by: the change of use to residential being appropriate for the site, reflecting the domestic use and character of its surroundings; the interpretation of the prevailing architectural style carried out by Adam Architecture being fitting and enhancing the character and appearance of the CA. The appeal scheme is therefore compliant with Policy DM9 (A).
- 3.11 In accordance with Policy DM9 (B), the proposals are assessed against the significance of the asset, i.e. the CA and the impact of the proposals on that significance in chapter 4 of the HTVA.

3.12 The proposals take care in preserving the historic function and character of the surrounding estate, reflecting the form of the surrounding residential fabric, and is therefore compliant with Policy DM9 (C).

3.13 Based on the analysis set out above, it is considered that both the provision of housing and the high architectural quality and sensitive design of the proposals constitute public benefits which far outweigh any perceived harm caused by the loss of an historical use which, in character and appearance terms, does not contribute to the significance of the Rookfield CA.

## 4.0 THIRD PARTY OBJECTIONS

- 4.1 This section considers the Heritage Assessment prepared by the Built Heritage Consultancy on behalf of Cascade Avenue Association CCARA ('Objectors' report'). This document has not been referred to in the Officer's Report, however the main points are addressed below.
- 4.2 Many of the research facts in this document are accurate, in particular the fact that six tennis courts existed by 1912 as shown in the Hornsey & Finsbury Park Journal (fig.15 p.16). However, it is not agreed that the tennis club makes a significant contribution to the CA in terms of its architectural/town planning contribution, historical importance or its effect on the character and appearance as a whole.
- 4.3 At p.21 of the Objectors' report states that: *"The 25 year lease on the tennis club ran out in 2011 and the then landowner of the freehold on which the tennis club stands (a direct descendant of the Collins family) declined to grant a new lease to the residents or to allow residents access to the facilities. The freehold of the land on which the club stands was then offered for sale on the open market."*
- 4.4 At p.25 of the Objectors' report makes reference to a draft Conservation Area Appraisal document 2020. The status of the draft CA Appraisal of 2020 is unclear as it is not referred to in LBH's Heritage Impact Assessment or the Officer's report, and is not currently available on LBH's website. It is believed to have been 'informally consulted on' as claimed in the Objector's report (p.10). This is followed by an extract of the draft CA Appraisal which goes into some detail on the architectural and urbanistic characteristics of the estate but makes no reference to the tennis courts. It instead describes The Court and Rookfield Close as the only *"principal open spaces"* and as positive contributors to the CA. The tennis use and tennis court arrangement are not considered to be important contributors to the significance of the CA.
- 4.5 The Objectors' report at p.25 states that *"While the text in the draft Conservation Area Appraisal document recognises the diversity of the houses and the completeness of survival of the estate and the contribution both make to the character and appearance of the conservation area, it*

*does not set out the importance of the open spaces to the conservation area*". This is incorrect – the extract from the draft CA Appraisal that is referred to states that *"The two principal open spaces, The Court and Rookfield Close, each have a different character and add positively to the setting of the surrounding houses."*

4.6 At p.26 the Objectors' report states: *"It is not only the buildings and tennis courts themselves that are important in the conservation area, but also their relationship with the open spaces. For a garden village in particular, these spaces are a key feature of the overall design and work together with the buildings to create a balanced whole. There are well planted public areas in the Rookfield Garden Village such as Rookfield Close and The Court, but also the tennis club, which are not only important for their contribution to the landscaping, creating air and space, but also as communal open spaces for community events"*. The extract they refer to from the draft CA Appraisal, however, does not mention the tennis courts as an important open space in fact does not mention tennis courts at all.

4.7 At p.27 the Objectors' report states *"As the tennis club has been assessed above as making a significant contribution to the conservation area, both in terms of its architectural/town planning contribution and its historical importance in any decision the impact of its loss of the designated heritage asset of the conservation area must be taken into account, as paragraphs 199-202 set out. In particular when the loss of a key element of a heritage asset is being considered paragraph 201 sets out criteria that should be met to justify it."* It is not considered that the tennis courts are a key element of the conservation area. They do not make a significant contribution to its character and appearance. It can be noted, however, that the club pavilion will be retained as a memory of the once open tennis club.

4.8 At p.31 the Objectors' report concludes that *"Were [The Grove Lawn Tennis Club] to be lost through the proposed development with housing, it is our opinion that this would cause substantial harm to the significance of the Rookfield Conservation Area, as it would remove an open space that was fundamental to the ideals of this garden suburb and to the concept of the*

*original development by the Collins family*". This is a harsh allegation of harm to the character and appearance of the CA and is not part of LBH's reasons for refusal. If LBH believed there was such a level of harm, this would have been clearly identified in the reason for refusal. It is the appellant's view that the tennis courts were not fundamental to the ideals of this estate. Were it to be so, the landscape element would have been better handled and the Collins family would not have reduced it by half.

## **5.0 HERITAGE ASSETS, THEIR SETTING AND SIGNIFICANCE**

- 5.1 Understanding the context of a site is essential in producing a design appropriate for its place in the immediate surroundings and in relation to the wider townscape. In this case a comprehensive study of the context was carried out to inform the design team of heritage considerations. This is set out in Citydesigner's HTVA dated 8 February 2023.
- 5.2 Paragraph 202 of the NPPF 2024 notes that heritage assets are "an irreplaceable resource" and that they "should be conserved in a manner appropriate to their significance". In this case, that the character and appearance of the designated asset, i.e., the Rookfield Conservation Area is enhanced and no harm occurs to any heritage assets.
- 5.3 In the HTVA the significance of the heritage assets potentially affected by the appeal scheme is analysed. A heritage assets map is presented at page 12 of the HTVA. For the purposes of this Hearing, the analysis in the HTVA is further expanded below.
- 5.4 There is a 'layering of heritage status' within the CA, with the listed buildings within it forming the foremost layer; the locally listed buildings a secondary layer; and the remaining built fabric and open spaces included within the boundary of the CA, i.e. positive contributors to the CA, forming the lower layer in this hierarchy. Other than the tennis pavilion which would be retained in the proposals, the tennis courts have no qualities of historic fabric for them to fall into any of the hierarchies.
- 5.5 The listed buildings comprising Nos.5-7 and No.9 Muswell Hill are located in the north east corner of the CA and their significance lies in their historical and architectural interest as surviving early to mid-19<sup>th</sup> century fabric, predating the Rookfield Estate. The setting of these separately designated assets would not be affected by the proposals, due to distance and topography.
- 5.6 Locally listed buildings within the CA (from the LBH undated Register of Local Listed Buildings of Merit) include on St James's Lane: Nos.101 & 103 (Willow Cottage); Nos.105 & 107;

Nos.108 & 110 and No.112 (Manor Farm Cottages); and on Muswell Hill Nos.1&3 and Grove Lodge. Nos.1&3 Muswell Hill and Grove Lodge, Muswell Hill would not be affected by the proposals, due to distance and topography.

- 5.7 The closest locally listed buildings to the appeal site comprising Nos.108 to 112 St James's Lane and Nos.101 to 107 St James's Lane are located in the western corner of the CA, a little way north west of the development site. Their interest lies in their age, predating the Rookfield Estate; or on local significance as fabric associated to the area's rural past. Their significance is not directly derived from the historical or architectural value of the Rookfield Estate, being of an earlier date and not reflecting the architectural ambition and style(s) of the estate. These heritage assets would not be affected by the proposals due to separation distance, meaning the proposals would not be significantly visible within their setting.
- 5.8 It is therefore established that there is only one designated asset that would be affected by the proposals and that is the Rookfield Estate Conservation Area (CA). No listed or locally listed properties in the CA are affected.
- 5.9 LBH has produced a draft Conservation Area Character Appraisal in 2020 which was 'informally consulted' on but has not yet been adopted. Its status is unclear as set out in paragraph 4.4 of this Statement. The only access to it is by virtue of an extract of the draft Appraisal, included in the CCRA's Objectors' report at p.12). It states that "*The Rookfield Estate is of special interest partly due to its topography and that it was developed by a single family of builders over a considerable length of time that is reflected in the use of changing architectural styles over the period of its building.*" It adds that "*The variety of character within the estate derives from the fact that it was built by the Collins family over a relatively long period between 1901 and 1934. This led to the estate having a less homogeneous appearance and with a greater variety of architectural styles than if it had been built as a single development*" and that it "*has matured into a residential environment of considerable charm and architectural interest.*" It is important to note that the tennis courts and pavilion are not mentioned in this extract of the draft CA Appraisal and that, instead, it describes The Court and Rookfield Close as "*principal open spaces*" which "*add positively to the setting of the surrounding houses.*"

- 5.10 In the HTVA, the assessments include the consideration of a ‘third layer of assets’ i.e. built fabric within the CA and established various groups of architecturally linked terraces or dwellings. The assessment of the significance of the CA and its components, and the contribution of the tennis courts to the CA’s significance, are set out in paragraphs 4.7 to 4.12 of the HTVA.
- 5.11 With regards to the contribution the tennis courts make to the CA, there is no doubt that the estate’s authors, the Collins family, were tennis enthusiasts or that they included tennis courts within other developments they built but, in the case of the Rookfield Estate, the addition of the original six courts by 1912 would not have been of fundamental significance to the overall design of the estate. It was in fact the same Collins family that truncated the original six court layout by removing half for the construction of Etheldene Avenue in the 1930s. This pragmatic decision is similar to that being made now by the current owner.
- 5.12 It is also worth noting that in 1965 the three courts were all in line, more ordered and related geometrically with the residential elements. Now, the courts do not hold that order having been re-planned in the interim. Their asymmetrical form no longer relates as the original layout intended. This is shown in figs 2.4, 2.5 and 2.8 of the HTVA.

#### **Assessment against London Plan policy HC1**

- 5.13 In accordance with London Plan Policy HC1A, LBH has identified the Rookfield Estate as a heritage asset and designated it as a conservation area. LBH produced a draft Conservation Area Character Appraisal in 2020 but its status is unclear and it has not been adopted. The significance of the CA and the effects of the proposals on this significance are covered in detail in chapter 4 of the HTVA (pp.13-17).
- 5.14 In accordance with London Plan Policy HC1B, LBH’s Development Plan’s Policy DM9 states that *“development that sustains and enhances the significance of a heritage asset and its*

*setting will be supported.*” The assessments in the HTVA and this Statement show that the proposals both sustains and enhances the significance of the Rookfield Estate Conservation Area. Policy DM9 is not included in Reason for refusal 2, however, it is mentioned in the Officer’s Report as a relevant policy. Policy DM9 has been considered in paragraphs 3.10 – 3.12 of this Statement.

- 5.15 In regard to London Local Plan (2021) Policy HC1, I believe the proposals fulfil this policy by: the applicant having understood the significance of the context of the site; applying heritage considerations early on in the design process; reflecting its architectural style and aesthetic; and providing effective integration sympathetic to its context and to the Rookfield Estate Conservation Area’s significance as a residential estate built over successive phases of development.
- 5.16 Based on the evidence provided in the application documents, and the appellant’s SoC, it is concluded that the proposals both sustains and enhances the significance of the CA and its setting by: the change of use to residential found for the site being appropriate, reflecting the domestic use and character of its surroundings; the interpretation of the prevailing architectural style carried out by Adam Architecture being fitting and enhancing the character and appearance of the CA.
- 5.17 There are clearly flaws in the evidence presented on behalf of LBH. These should lead to the upholding of this appeal.

## **6.0 SUMMARY**

- 6.1 The Reason for refusal 2 is not sound as justification for the design, including its scale, mass, and height; and high architectural quality, is fully presented in the application documents. The proposal's impact is considered to be consistently beneficial within its townscape and heritage context. The obvious future use for the site is housing - as modern sports facilities tend to be floodlit, surrounded by unsightly fencing and noisy, spoiling the ambiance of this residential enclave and thus both the character and appearance of the CA.
- 6.2 Adam Architecture has been carefully selected as sympathetic to the style of the surrounding estate and capable of producing a contemporary version of similar charm and quality.
- 6.3 The proposed type of residential development and the skill of the architects have led to the likely effect of the proposals on the character and appearance of the conservation area to be an enhancement, by adding a well-designed row of dwellings in keeping with their surroundings.
- 6.4 As set out in this Statement, it is important to understand the scheme as a whole, including the overall composition, its form, architectural expression and materials, all of which are derived from the existing context. The principle of high quality design is an important consideration here, as perceived harm can be mitigated by high quality design such as that exhibited in the appeal scheme. It should be noted that in Historic England's Good Practice Advice Note 3, paragraph 39, this approach is fully endorsed.
- 6.5 Having addressed the points raised in the Reason for refusal 2, the Officer's Report, LBH's Heritage Impact Assessment and the principal third party objector's Heritage Assessment report, it is concluded that the appeal scheme does not cause any harm to the character and appearance of the Rookfield Estate CA.

- 6.6 Even if the potential for harm were realised, the level of residual harm, taking into account the qualities of the design, could only be of the very lowest degree of 'less than substantial harm' and more than balanced by the public benefits provided by the scheme.
- 6.7 The appeal scheme is compliant with policy and guidance, in terms of heritage conservation and design when assessed against local policies DM1, DM7, DM9 of LBH Development Management DPD (2017); policy SP11 of LBH Local Plan Strategic Policies (2017); policies D3 and HC1 of the London Plan 2021, and in the context of the national heritage policies from chapter 16 of the NPPF 2024. Other policies and guidance relevant to the scheme are dealt with in the appellant's main Statement of Case.