



Historic England

Graham Harrington
Haringey London Borough Council
Housing, Regeneration and Planning
River Park House
225 High Road
N22 8HQ

Direct Dial: 020 7973 3091

Our ref: HGY/2020/1361

06 July 2020

Dear Graham Harrington

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

**807 HIGH ROAD, LONDON
Application No. HGY/2020/1361**

Thank you for your letter of 16 June 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. Due to current restrictions we have not been able to visit the site, but on the basis of the information provided we can offer the following definitive advice.

Historic England Advice

Significance

The site falls within the North Tottenham Conservation Area, which is one of the five conservation areas which make up the Tottenham High Road Historic Corridor. The High Road follows the former Ermine Street, a major Roman road and this stretch of the Conservation Area is characterised by good quality eighteenth and nineteenth century development.

The existing street fronting block has the appearance of a Victorian commercial building, though analysis of historic maps suggests that it was actually built in the mid-twentieth century. The elevation at first floor level features good quality English bond brickwork with flat-headed window arches, picking up the prevalent detailing of the surrounding historic buildings. That such great care was taken to assimilate the building with the historic townscape at the time that it was constructed may be considered to be of some interest in its own right. For these reasons we consider that the existing building does make a limited-positive contribution to the Conservation Area, though the ground floor shop front is much altered and of poor quality.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
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The site is directly opposite the pair of Queen Anne houses at nos.808-810, which reflect the early-eighteenth century development of the High Road and are Grade II* listed.

Impact

The proposals are for the demolition of all buildings on the site and construction of buildings of up to four storeys. The impact is on the Conservation Area and to a lesser degree, on the setting of the Grade II* listed buildings opposite.

Policy

Haringey Policy DM9 D, Conservation Areas, states 'Subject to (A-C) above the Council will give consideration to, and support where appropriate, proposals for the sensitive redevelopment of sites and buildings where these detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or complement the special characteristics and significance of the area.'

Policy D3 of the New London Plan (Intend to Publish December 2019) requires that development proposals should 'respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character'. Para 3.3.7 further states that 'Developments that show a clear understanding of, and relationship with, the distinctive features of a place are more likely to be successful. These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the special characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value...'

The NPPF places great weight on the desirability of sustaining and enhancing the significance of heritage assets, and of new development making a positive contribution to local character and distinctiveness. Paragraph 190 stresses that conflict between the asset's conservation and any aspect of the proposal should be avoided or minimised and Paragraph 194 states that any harm to a designated asset must be clearly and convincingly justified. Paragraph 200 states that local 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.

Position

We note that the building is considered by the Council to make a neutral contribution to the Conservation Area, and whilst we may disagree on this, we agree that it could be replaced subject to the design of the replacement. This is particularly important given that the existing building represents a highly contextual response to the historic



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townscape and contributes to local character, and so sets a high bar for any replacement building.

We do not consider that the proposals would meet the statutory test of preserving (or enhancing) the character and appearance of the Conservation Area; there would be some harm arising and this would be 'less than substantial' under the terms of the NPPF. The overall design may have beginnings of a sympathetic response, but we consider that it requires further refinement in order for the harm to be appropriately minimised. We recommend that a more thorough assessment of the visual impact of the proposals is undertaken, which should be informed by a detailed contextual analysis of their immediate built environment.

Our primary concerns lie in the detailed design and composition of the elevation. The junction with the neighbouring historic buildings requires careful consideration and the drawings do not suggest that this has been successfully resolved, particularly to the north. The submitted drawings also generally lack detail. We strongly recommend that detailed drawings should be required at the planning stage in order to be able to assess whether the new development would match up to the subtle qualities of the existing building, and not left to condition as the design quality should inform the decision. For example, it would be desirable to use an English or Flemish bond alongside flat headed arches with gauged brickwork, which are both positive elements of the existing building, and are commonplace throughout this part of the Conservation Area. Stretcher bond and soldier-course lintels are not felt to be an appropriate substitute. We also question whether a buff or pale brick is an appropriate choice given the prevalence of darker soot-stained brickwork, as a new brick will not darken in the same way.

With Paragraph 200 of the NPPF in mind, which encourages opportunities to be taken to enhance or better reveal the significance of conservation areas and the setting of listed buildings, the history of the site could further inform the design. The probable early-nineteenth century weather-boarded building, which existed on the site until the late-1930s, featured a carriage way leading to a yard known as Chapel Place. The submitted Archaeological Assessment supposes that the site was once that of a royal house, and later a coaching inn known as 'The Horns', a complex which was likely clustered around the yard. Since the carriageway and yard were historically of high importance, it could be worth exploring the possibility of subtly expressing their presence (or the historic urban grain) in the elevation design. This could enhance the understanding of, and better reveal, the significance of the Conservation Area. It could also give a certain logic to the street fronting block which would serve as the entry point to the development at the rear of the site.

Recommendation

Historic England has concerns regarding the application on heritage grounds.



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We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 193 and 194 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

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

Alexander Bowring

Inspector of Historic Buildings and Areas

E-mail: Alexander.Bowring@historicengland.org.uk

cc.

Elisabetta Tonazzi, Haringey Council