

Our ref: Q240790/JB
Your ref: PP-13592994 & PP-13593362
Email: james.beynon@quod.com
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Housing, Regeneration and Planning
Haringey Council
River Park House
225 High Road
London
N22 8HQ

Dear Sir/ Madam

APPLICATION FOR FULL PLANNING PERMISSION & LISTED BUILDING CONSENT 790-792 HIGH ROAD, TOTTENHAM, N17 0DH

On behalf of 'Paxton17 Ltd', please find enclosed applications for full planning permission and Listed Building Consent (LBC) at Dial House (790 High Road) and 792 High Road, Tottenham ("the Site"). Consent is sought for:

- Full planning permission at 790 High Road for a change of use from residential (C3) to office (Class E, g, i) and external alterations to the rear elevation (**PP-13592994**).
- Listed Building Consent for internal and external alterations to 790 High Road, alongside the installation of rooftop plant to 792 High Road (**PP-13593362**).

The following information has been submitted to the London Borough of Haringey (LBH) via the Planning Portal in support of both applications:

- This Cover Letter, outlining the relevant planning justification.
- Application Forms including requisite Certificates of Ownership.
- Design and Access Statement.
- Heritage Statement.
- Drawings and accompanying Drawing Schedule (V1), identifying those plans submitted for approval the planning and LBC applications.
- MEP details.
- Structural details.
- Condenser Unit details.

The requisite planning application fee of £578 has been paid via the Planning Portal, calculated in full accordance with the Town and Country Planning (Fees for Applications, Deemed Applications,



Requests and Site Visits) (England) Regulations 2012 (as amended). There is no fee payable for the enclosed Listed Building Consent (LBC) application.

Site Context and Background

The Site comprises Dial House (790 High Road) and the adjoining 792 High Road. Full Planning permission is sought in respect of 790 High Road only, with LBC sought for 790 High Road and the rooftop level of 792 High Road. For the avoidance of doubt, aside from roof level the remainder of 792 High Road is not subject to any proposed works.

The Site forms part of Northumberland Terrace, a historic terrace of listed buildings that extend from 790 to 814 High Road in a north-south direction. Northumberland Terrace is one of the most important heritage assets in the North Tottenham Conservation Area.

Dial House is a late 17th century Grade II* Listed Building located on the east side of High Road. The building consists of vacant residential accommodation and comprises 3 storeys, a high pitched hipped tiled roof with end chimneys built out from ridge.

Dial House was impacted by two major fires in 1976 and 1977 resulting in the substantial loss of historic fabric. Restoration works were carried out in 1984 which retained the external façades and return walls and reinstated the Georgian sash windows. An extension was added to the rear as part of the restoration works which had little regard to reinstating the former internal historic fabric of the property. These restoration works include internal floors reconstructed with concrete beam and block, internal walls built with engineering brick, additional staircases installed, and a replacement roof constructed of steel.

792 High Road adjoins the north of Dial House and is Grade II listed. This property was subject to modern rear extensions to replace an earlier extension damaged by the fires at Dial House in 1976 and 1977. Of relevance to the enclosed applications, the roof comprises a dual pitched hipped roof constructed from tiles, with a valley gutter above the spine wall. A parapet wall around the property conceals the majority of the roof from street level.

The enclosed Heritage Statement outlines the heritage significance of the Site and surrounding statutory heritage assets of relevance. Of relevance to Dial House, this notes that significance is largely drawn from the front façade facing onto High Road and the external northern and southern return elevations of the original building, but not including the more recent rear extension. The roof level of 792 High Road is of a modern fabric and of no/neutral heritage significance.

Relevant Planning Background

The Applicant is undertaking a phased redevelopment of the Northumberland Terrace land to the rear (east). A comprehensive approach has been adopted to the repair and restoration of the historic terrace, with the first phase (Paxton) now operational and providing the immediate interface between



the stadium and terrace itself. Alongside the four-storey, commercial “Paxton” building, Phase 1 has included new public realm within Paxton Square which extends to the rear of the Site.

Phase 2 restored the external envelope of 790-794 High Road, removing poor quality rear extensions to better reveal the significance of the buildings. Specific to the Site, LBC was granted on 25 March 2019 (ref: HGY/2019/0315, as amended) for proposed works of repair and minor alterations to Nos. 790, 792 and 794 High Road. The works carried out under this consent included the restoration of the frontages including railings, walls, entrances and landscaping. They also included works to the front and side elevations of the listed buildings including roofworks, parapets, cornices, brickwork, door surrounds and windows.

Listed Building Consent was granted on 7 September 2012 (ref: HGY/2012/0020) for the removal of defective brickwork to flank elevation and rebuild utilising existing foundation brick wall.

A change of use application for 792-794 High Road was approved on 4 November 2022 (ref: HGY/2022/1658) from residential (Class C3) to mixed use arts studios and exhibition space (Class E and F1b) in conjunction with alteration and replacement of doors, windows, shutters, external lighting and storage area and associated landscaping and works.

Pre-application advice was sought in 2019 (ref: PRE/2019/0212) relating to development of Phase 3 of the Northumberland Terrace regeneration, comprising Nos. 790-814 High Road and involving the extension of new buildings and rear extensions, the demolition of existing rear extensions, the change of use of several properties and new landscaping to the rear (east) to establish a new Cultural Quarter. In respect of the Site, this included the lateral connections of 790, 792 and 794 High Road internally; the installation of a glass lift to the rear of 790 High Road; and the formation of a new double entrance to the rear elevation of 790 High Road.

Whilst subsequent Phase 3 proposals were progressed and secured by the Applicant in respect of 798-814 High Road only¹ (i.e. excluding the Site), pre-application feedback received in respect of the Site is directly relevant to the enclosed submission. Notably, in their written response the Council confirmed that:

- Dial House has a great deal of architectural and historic merit, with the original fabric being of very high significance, whereas the 1980’s rear extension and related works detract from the building’s significance.
- A replacement rear extension inclusive of an external lift tower to Dial House was supported, with Officers noting that any works should be subservient to the original

¹ refs. HGY/2022/1642 and HGY/2020/1586.



building and this having the potential to make a positive contribution to the character and appearance of the building.

- The repurposing of 790-794 for alternative uses (including gallery, museum and café) was supported in principle, as was the internal lateral connections of these buildings.

In granting the Phase 3 consents, Officers considered that a “*positive impact*” on the heritage assets would occur and that the proposed mixed of uses would help “*make the site vibrant and active at times when the THFC stadium is not in use*”².

The enclosed applications comprise the next phase of the Northumberland Terrace regeneration.

Proposed Development

Full planning permission is sought for the following works:

- Change of use of 790 High Road from residential to office (Class E, g, i).
- External alterations to the rear (east) elevation of 790 High Road, comprising the removal of the central window at ground floor level and replacement with a new single entrance doorway.

Listed Building Consent is sought for the following works:

- External alterations to the rear (east) elevation of 790 High Road, as noted above.
- Internal alterations to 790 High Road to facilitate the repurposing for office use, including removal of unsympathetic divisions, stairwells, intrusions and poor-quality internal additions; restoring and reinstating historic joinery and architectural elements where they are incomplete and/or where they have been lost due to fire damage; and carrying out conservation repairs to floors, ceilings and joinery.
- Installation of 6 condensers to the roof of 792 High Road, positioned within the roof valley and below both the existing parapet and roof line.

The above changes should be read alongside the Design and Access Statement and Heritage Statement which provide further details of the specific alterations. To confirm, there is no change to the overall floorspace of the development.

The proposed roof condensers to 792 High Road will sit between the two dual pitched roofs within the central roof valley. Their maximum height will be sat below the prevailing height of the pitched roofs and parapet meaning that they will not be visible from any surrounding streets, properties or public

² Officer Report to HGY/2020/1584 & HGY/2020/1586, Paras. 6.5.34 & 6.16.1.



vantage points. As such, there would be no “material effect” on the external appearance of the building when read as a whole and the change would not be noticeable.

This position is reinforced by case law³ which has established that the degree of visibility is an important factor and that any change to the external appearance of a building must be visible from a number of normal vantage points.

On this basis, the works cannot be “development” for which planning permission is required consistent with Section 55 of the Town and Country Planning Act 1990. LBC is however sought given that the works are new additions to the roof of a listed building.

Planning Policy and Assessment

Within the Council’s adopted Development Plan, the Site is subject to the following relevant designations:

- Within Site Allocation NT7 (Tottenham Hotspur Stadium).
- Within the North Tottenham Conservation Area and an Archaeological Priority Area.
- Within a Critical Drainage Area.
- Within the Northumberland Park Growth Area.
- Statutorily listed buildings at 790 High Road (Grade II*) and 792 High Road (Grade II).

The Site falls within Flood Zone 1 which means it is within an area with the lowest probability of flooding.

Principle of Development

The surrounding area is subject to significant ongoing change. The Tottenham Area Action Plan (TAAP) sets out an indicative development capacity and a range of uses for Site Allocation NT7 including a new stadium, 285 net residential units, 4,000sqm of commercial uses and 122,045sqm of leisure uses amongst others.

Within the TAAP, Site Allocation NT7 sets out a series of site requirements, including:

- Delivering high quality design that responds positively to the heritage context and provides active frontages to the High Road. This includes following the principles of the ‘Management of Heritage Assets’ section of the TAAP.
- Ensuring that retail/commercial uses are complementary and do not compete with the uses proposed on the expanded Local Centre to the western side of High Road.

³ Burroughs Day vs Bristol Council [1996].



- Adopting a comprehensive approach to delivering physical improvements to the Northern Terrace, including the identification of viable, long term uses for vacant buildings.

Within this context, the Applicant has already adopted a comprehensive approach to the repair and restoration of the Northumberland Terrace, with the enclosed proposed being the next phase of this regeneration.

There is wider support for the principle of the development outlined within the NPPF. Section 6 supports the growth of a strong and competitive economy, placing significant weight on the need to support economic growth and productivity, including the taking into account of both local business needs and wider opportunities for development. Alongside this, Paragraph 123 promotes the effective use of land in meeting the need for homes and other uses, encouraging as much use as possible of previously developed or brownfield land.

The principle of providing office development at the Site is therefore supported by policy and in accordance with the requirements for Site Allocation NT7 and national policy objectives.

Loss of Residential Use

Development Management DPD Policy DM10 states that the Council will resist the loss of all existing housing unless the housing is replaced with at least equivalent new residential floorspace. The Site has been vacant for a considerable period of time but is believed to have been last occupied for residential use (10 flats) totalling 434sqm GIA.

In this instance, the residential floorspace would be replaced by the intended office use. There are, however, clear material considerations which justify this approach in respect of Policy DM10:

- Site Allocation NT7 supports commercial, and business uses at the Site.
- New and replacement residential development is allocated through the wider Site Allocation NT7, stating a new capacity of 285 homes.
- The NT7 capacity would be significantly exceeded. The Stadium planning permission⁴ consents 585 residential homes (49,000sqm GIA) within Site Allocation NT7, meaning that there are an additional 300 homes forecast for delivery within NT7.

The replacement of 10 units (434sqm GIA) at the Site is therefore not material in this context, being clearly outweighed by both the significant increase in proposed residential development and recognising the planning merit that the proposal affords.

Indeed, this position has previously been recognised and accepted by the Council in granting planning permission for the new Cultural Quarter (Phase 3) at Northumberland Terrace, concluding that the

⁴ HGY/2023/2137.



loss of residential use in that case would be outweighed by the “*substantial increase*” in expected housing across the allocation.

Policy DM10 is therefore satisfied and the loss of residential use within the Site is acceptable.

Heritage and Design

The Planning (Listed Buildings and Conservation Areas) (Act 1990 (Section 66 & Section 72) imposes a statutory duty to pay special regard to the desirability of preserving listed buildings and their setting and preserving or enhancing the character or appearance of a Conservation Area.

Section 16 of the National Planning Policy Framework (NPPF) 2023 sets out conserving and enhancing the historic environment and gives “*great weight*” to the conservation of heritage assets (Para 205) and requires applications concerning designated heritage assets to describe their significance and consider impact of a proposal upon this significance (Para 200).

The Application is supported by a Heritage Statement which considers the heritage significance of the Site both internally and externally, noting that the majority of internal significance within Dial House was lost due to historic fires and the subsequent restoration that took place, and the majority of the Site’s significance is therefore drawn from its external frontages. In summary, the Heritage Statement concludes that:

- No historic fabric is harmed within 790 High Road.
- Within 790 High Road, the symmetry and simplicity of the historic layout is enhanced by removing more recent (post-1984) subdivisions, bathrooms and kitchens. The proposals will reinstate a number of missing elements, alongside undertaking localised enhancements and repairs.
- Specific to 790 High Road, there is a very small degree of harm arising to the significance overall, with this being at the “*lowest level*” of less than substantial harm.
- There is no harm arising to the historic fabric, setting or significance of 792 High Road with a neutral impact occurring overall.
- There are no wider statutory heritage assets that would be adversely affected by the proposals, including the North Tottenham Conservation Area and/ or surrounding listed buildings, with no harm arising to these assets.

The NPPF (Para 208) requires the low level of “less than substantial harm” arising to 790 High Road in this case to be outweighed by the public benefits arising, including securing the optimum viable use of the property.



The PPG defines public benefits from development to be anything that delivers economic, social or environmental **objectives**⁵. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. The proposals provide a series of benefits, including:

- Repurposing a previously developed, vacant building and ensuring its meaningful use in the long-term.
- In addition to short term construction jobs, the new office use will create c. 50 new jobs.
- The Site is sustainably located, being close to existing public transport networks and amenities.
- Economic benefits, including but not limited to, increased business rates, increased Gross Value Added (GVA) and increased consumer spending in the local area due to additional employees to the site.
- Improvement to the historic layout and interiors of the heritage asset by reinstating the former historic fabric of the property that previously has been unsympathetically altered or covered
- Improved accessibility to Dial House, including wheelchair accessibility.

NPPF Paragraph 208 is therefore satisfied, with the very low level of less than substantial harm clearly outweighed by the public benefits arising in this case.

As well as satisfying the NPPF, the proposals further accord with Local Plan Policy SP11 which requires new development to be of the highest standard of design that respects its local context and character and historic significance, and Policy SP12 which ensures the conservation of the historic significance of Haringey's heritage assets, their settings and the wider environment.

More generally, the external alterations to 790 High Road will replace an existing window with a new entrance, improving accessibility to the recently delivered Paxton public realm and providing a new active frontage directly into this space. The works are a minimal intervention in the context of the overall building and use materials that are consistent with the existing historic fabric of the Site.

The proposals satisfy Local Plan Policies SP11 and DM1 and achieve a high standard of design that contributes to the character of the local area. NPPF paragraphs 131 and 137 state high-quality, sustainable, good design which has materialised from effective engagement with the Local Authority should be achieved. Therefore, the requirements in relation to good design are achieved through the proposals.

⁵ Paragraph: 020, Reference ID: 18a-020-20190723.



Summary

Full planning permission and LBC is sought to repurpose 790 High Road (Dial House) for office use alongside associated works to both 790 and 792 High Road. External works are limited to the rear façade with the majority of alterations being internal to areas of no/low historic value. In summary:

- The principle of development is appropriate and supported by policy at the national and local levels.
- The loss of vacant housing within the Site is minimal and outweighed by the significant uplift being achieved across Site Allocation NT7.
- Less than substantial heritage harm arises to 790 High Road only, with this being at the very lower end of its spectrum. This is clearly outweighed by the public benefits arising and both national and local policy on heritage matters are addressed, as are the statutory tests to preserve listed buildings and their setting and preserve or enhance the character or appearance of the North Tottenham Conservation Area.
- The design of external alterations is consistent with the established character of the property and appropriate to its setting.

A high level of detail is included as part of the application, including internal detailed elevations and both MEP and structural details. The Applicant wishes to front-load the applications to avoid conditions requiring further information wherever possible, and to assist the quick delivery of the new use.

I trust that the above is acceptable and I look forward to receiving confirmation of formal validation in due course. Please do not hesitate to contact me should you require any further information.

Yours sincerely

James Beynon
Director

cc. Richard Serra – Tottenham Hotspur Football & Athletic Co. Ltd
Alan Carruthers, Akshata Hatle – F3