

Town And Country Planning Act 1990

Acquisition of Land Act 1981

Local Government (Miscellaneous Provisions) Act 1976

Inquiry into:

**THE LONDON BOROUGH OF HARINGEY
(HIGH ROAD WEST PHASE A) COMPULSORY PURCHASE ORDER 2023**

ADDENDUM TO

PROOF OF EVIDENCE

of

Michael Alan Dunn BA, MA, DipUD, IHBC

Director, The Townscape Consultancy

On behalf of the London Borough of Haringey

November 2023

1. **Introduction**

- 1.1 The purpose of this Addendum is to correct factual errors contained within my main proof of evidence ("**PoE**") [CD 9.15] and provide an assessment of the effect of the Development on the following locally listed buildings:

1.1.1 743 to 759 Tottenham High Road; and

1.1.2 Electricity Substation Adjoining the Library (also on Tottenham High Road) ("**Substation**").

2. **Clarification**

- 2.1 The second and third sentences of paragraph 10.2 of my PoE are factually inaccurate. The Development authorises the demolition of 8 to 18 and 24 to 30 White Hart Lane, but the buildings are not located within the Order Land.

3. **Additional Heritage Receptors**

- 3.1 The locally listed buildings at 743 to 759 Tottenham High Road and the Substation are located outside of the North Tottenham Conservation Area. They were erroneously not included in the assessment in my PoE.

3.2 743 to 759 Tottenham High Road is a terrace of late Victorian three storey commercial buildings with projecting shopfronts. The upper floors are built in stock brick with minimal decorative detailing, apart from a moulded cornice and vermiculated keystones above the windows of 743 to 757 Tottenham High Road. The former Whitehall Tavern, at 759 Tottenham High Road, forms the corner to Whitehall Street and is larger than the rest of the terrace, but is architecturally plain. I agree with the assessment by Montagu Evans in Section 9 of their HTVIA that the heritage value of these buildings is very low.

3.3 I also note that the buildings at 743 to 759 Tottenham High Road were previously within the North Tottenham Conservation Area, but this was de-designated by the Council in 2017 to facilitate the redevelopment of High Road West on the basis that "*the remaining buildings on the west side of the High Road, taken by themselves, are not considered of sufficient special interest to justify conservation area designation in accordance with NPPF*".

3.4 I agree with the Council's reasoning for de-designating this part of the North Tottenham Conservation Area in 2017.

3.5 The Substation is a small late Victorian stock brick building with a steeply pitched roof and plain elevations. I agree with the assessment by Montagu Evans in Section 9 of their HTVIA that the heritage value of this building is very low.

3.6 The plan at Appendix 1 of my PoE identified these assets as locally listed but did not refer to them within the key to the plan. I attach an updated plan at Appendix 1 of this Addendum.

4. **My Assessment**

4.1 Both locally listed buildings are proposed for demolition as part of the Development, and would be replaced by new buildings. The effect of demolition would be the total loss of significance of the locally listed buildings. As such, this will result in substantial harm to these buildings.

4.2 Paragraph 203 of the NPPF, states that when considering applications that directly or indirectly affect non-designated heritage assets a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

4.3 Given the very low significance of these buildings and their location outside of North Tottenham Conservation Area, the overall impact of their loss on nearby heritage assets would be neutral.

5. **Conclusion**

5.1 My PoE concluded that the Scheme would cause some less than substantial harm to the significance of heritage assets through the impact of the proposals upon their settings. I found that the level of harm ranged from very low to low on the scale of less than substantial harm. The heritage assets and level of harm that I attributed to them are summarised at paragraphs 10.23 and 10.24 of my PoE.

5.2 The effect of the demolition of the locally listed buildings at 743 to 759 Tottenham High Road and the Substation, as set out in this Addendum, does not change the conclusions reached in my PoE.

5.3 The locally listed buildings at 743 to 759 Tottenham High Road and the Substation, as well as possessing very low heritage value in their own right, do not contribute to the significance of nearby heritage assets by virtue of their settings. They are located outside of the North Tottenham Conservation Area, and do not form part of any group of other heritage assets. Their total loss as part of the Scheme does not affect my overall assessment of the impact on heritage assets in my PoE and set out above.

5.4 Finally, I note on the 10 October 2023 (and following submission of my PoE) the Judicial Review was heard in front of Mr Justice Saini.

5.5 The Judgment was handed down on 18 October 2023 [**CD 5.17**] and confirmed that the claim had been dismissed.

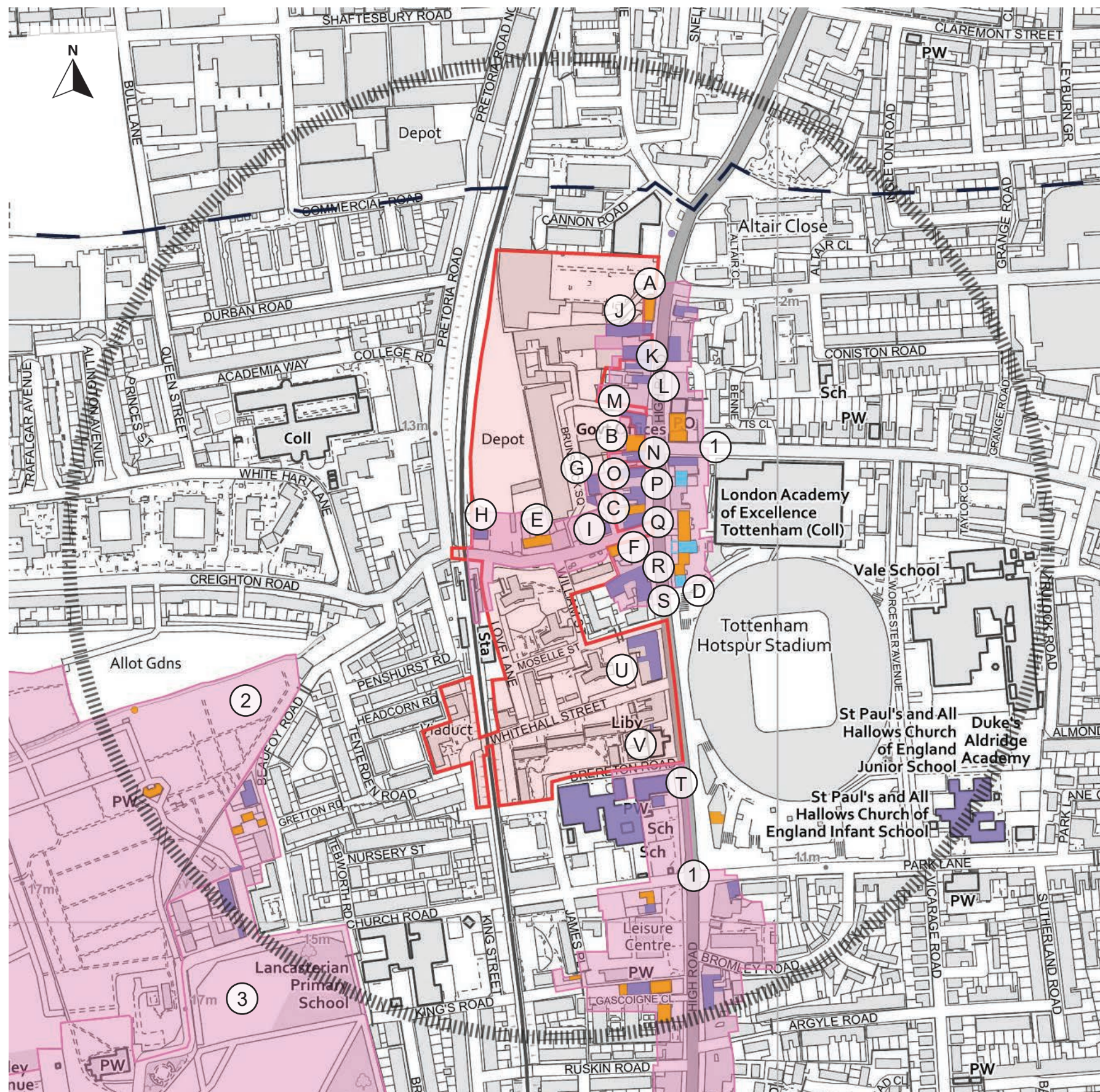
5.6 In the context of heritage, I note paragraph 26 of the Judgment which states:

"Heritage impacts were lawfully identified and were judged to be outweighed by the substantial public benefits which the scheme would deliver."

5.7 When considering whether relief would have been granted if he had found that the heritage impacts had not been lawfully identified, Mr Justice Saini went on to state at paragraph 28 that:

"Even if the level of heritage impacts were to be set out differently, it is in my judgment clear on the totality of the material before me that the public benefit balance of regenerating this area would have outweighed them (given the consistent planning judgments expressed to that effect)."

Appendix 1



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Approximate Site boundary marked in red for indicative purposes only. An approximate 500m radius is marked on the map. Heritage assets within this radius are identified.

Conservation areas are marked in pink and identified below.

Borough boundaries are marked with a blue dotted line.

Listed buildings:

- Grade I listed building
- Grade II* listed building
- Grade II listed building

Conservation areas:

- 1 North Tottenham Conservation Area
- 2 Tottenham Cemetery Conservation Area
- 3 Bruce Castle Conservation Area

Locally listed building

Listed buildings affected by the Development:

- A 867-869 Tottenham High Road
- B 819-821 Tottenham High Road
- C 797-799 Tottenham High Road
- D 790 Tottenham High Road
- E 34 White Hart Lane
- F 7 White Hart Lane

Locally listed buildings affected by the Development:

- | | |
|---|--|
| G Fromer Catholic Chapel and Pastor's House, Chapel Place | O 809-811 Tottenham High Road |
| H 52 White Hart Lane | P 801-805 Tottenham High Road |
| I 6A White Hart Lane | Q 793-795 Tottenham High Road |
| J 865 Tottenham High Road | R 773-779 Tottenham High Road |
| K 847-853 Tottenham High Road | S 769-771 and 771A Tottenham High Road |
| L 841-843 Tottenham High Road | T St. Francis de Sales Catholic Church |
| M 823-829 Tottenham High Road | U 743-759 Tottenham High Road |
| N 813-817 Tottenham High Road | V Substation |