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PLANNING & HERITAGE
STATEMENT

Alteration and Extension to
Provide Additional
Apartment

200 Lancaster Road, Enfield
EN2 0JH

NHG Estates Ltd

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1 INTRODUCTION

- 1.1 The former Holly Bush Inn was converted to form a new Co-op convenience store which opened in December 2014. The accommodation at first floor level was subsequently converted to form two residential units as Permitted Development.
- 1.2 This statement has been prepared to accompany an application for the change of use of the remaining part of the building at second floor/attic level to form an additional residential unit with associated alterations to the building including the formation of a new staircase.
- 1.3 A design and access statement is no longer required for this type of application in accordance with The Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO), which came into force on 15th April 2015. Article 9(1) in Part 3 of the Order confirms that a design and access statement is only required for major development; or certain minor development in a Designated (conservation etc.) Area.
- 1.4 The purpose of this statement is to assess the proposed development in accordance with planning policies as well as with the statutory requirement contained in The Planning (Listed Buildings and Conservation Areas) Act 1990, which requires Local Planning Authorities to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.
- 1.5 200 Lancaster Road is not a Listed Building, nor situated in or near a conservation area. It does not appear in the Council's extensive 'Local List' of over 250 non-statutory heritage assets. The site is however close to the Grade II Listed Brigadier House, at Brigadier Hill, with the separately Listed Grade II garden walls and railings which lie just to the east of the site on the opposite side of Lancaster Road.
- 1.6 In this case there are two heritage assets to be considered, namely Brigadier House and its associated (separately listed) garden walls and railings. St Faith's Cottage, a Grade II Listed Building is located 150m to the north of the application site on Brigadier Hill. Given its location and the relationship of intervening buildings, it is not considered that the character or appearance of St Faith's Cottage will be materially affected by the proposed development.
- 1.7 The statement describes the significance of the heritage assets and the impact of the proposed development on their significance.

2 SITE DESCRIPTION

- 2.1 The former Holly Bush Inn at 200 Lancaster Road was a detached, two-storey public house dating from the early twentieth century. It replaced an earlier building on the site which is believed to have been much older but was demolished in 1927.
- 2.2 The new building replaced the original as part of the 'improved pub' movement that followed the First World War. This was an attempt to expand pubs' appeal beyond their usual male clientele and leave behind the image of drunkenness associated with Victorian and Edwardian pubs. Breweries created bigger, better pubs with restaurants, gardens and community meeting spaces. These would attract more respectable customers and appeal to families and particularly women.¹
- 2.3 The conversion of the ground floor to a convenience store and the first floor to residential, however, reflects structural changes in the licensed trade over recent years which have resulted in the loss of many pubs and clubs from villages, towns and cities. Factors have included smoking restrictions, alcohol off-sales encouraging drinkers to stay at home, and the greater popularity of larger town centre bars/restaurants.
- 2.4 The conversion maintained the overall appearance of the building, with its central porch altered to form a new front entrance to the store, and access to the first floor apartments from a side door on the Lancaster Road frontage. Existing window openings on the front elevation have been extended down to ground floor level and replaced with single panes in new aluminium frames. The single storey range to the west of the building has been retained and a small amenity area exists at the rear of the building.
- 2.5 The site forms part of a commercial centre on Lancaster Road spanning from Lavender Road in the east, to Chase Side in the west. The centre is characterised by small local shops, many with flats above, interspersed with dwellings. The site is located within 100m of bus routes on Chase Side and Lavender Hill which contribute to a medium Public Transport Accessibility Level (PTAL) of 3.
- 2.6 The building sits on the corner of Chase Side and is particularly prominent from the roundabout junction with Lancaster Road to the west. It is bounded by two-storey cottages to the south and more substantial two-storey houses, now retail at ground floor, to the east.
- 2.7 On the northern side of Lancaster Road, Brigadier House is a modest early-eighteenth century two-storey house set in its own grounds which are extensively landscaped with mature shrubs and trees. The house has been extended and is notable for its weatherboarded walls. The gates and railings surrounding the garden are intact on three sides although multiple repairs over time are readily apparent.

¹ Historic England "Best Inter-War Pubs Listed"
<https://historicengland.org.uk/whats-new/news/twenty-one-best-inter-war-pubs-listed/>

3 PROPOSED DEVELOPMENT

- 3.1 Following the completion of the Co-op store and the conversion of the first floor to form two apartments, a review of the remaining part of the building has taken place. The extensive attic area at second floor level remains unused and underutilised. Currently accessed via a lofthatch, it has a floor area of 190sqm (to eaves, at a height of 0.4m), although the southern part lies below a doubled-hipped roof with a valley between.
- 3.2 It is proposed to open up the attic area and replace the southern part of the roof with a single hip, and flat-roof dormer windows on the south and west elevations. This will result in a useable floor area of around 115sqm which can provide a sizeable living / dining / kitchen area and two double bedrooms with a bathroom & ensuite. The bedrooms/bathrooms would be lit and ventilated by rooflights on the north elevation of the existing roof.
- 3.3 Access to the new apartment would be from the existing residential access in the original ground floor lobby, via a new staircase structure built above, on the eastern flank of the building. This would allow an independent entrance door at second floor level.
- 3.4 The existing retail and residential uses at ground and first floor level would be unaffected by the proposed development and there is sufficient outdoor space to allow for bin storage at the side of the building.

4 PLANNING POLICY

- 4.1 Planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the Development Plan comprises the **Enfield Core Strategy** which was adopted in November 2010 and the **Development Management Document** adopted in November 2014. Issues and Options for a new **Local Plan for Enfield** to 2036 were published for public consultation at the end of 2018, and a Consultation Draft plan is expected to be published in 2020.
- 4.2 The **London Plan** was adopted in March 2016. A new draft London Plan was published for consultation in 2018 and subject to an Examination in 2019. A consolidated version of the Plan was issued in July and is currently being considered by the Panel. The final version of the Plan is anticipated for adoption in Winter 2019/2020. At present, policies in the Draft London Plan have limited weight.
- 4.3 A revised version of the **National Planning Policy Framework (NPPF)** was issued in July 2018 and updated in February 2019. It is a material consideration in the determination of planning applications, particularly where policies contained therein conflict with or supersede parts of the Development Plan

Local Planning Policy

Ealing Core Strategy (November 2010)

- 4.4 Core Policy 2 seeks to make provision for 3,950 new homes in the period to 2016/17 and to plan for growth in areas where physical and social infrastructure already exists or can be improved. (The emerging Enfield Local Plan proposes that this be increased to at least 1,876 homes per year in the plan period between 2018-2036).
- 4.5 Core Policy 3 expected a contribution towards affordable housing on all new housing sites, with developments of less than ten dwellings making a financial contribution towards affordable housing off-site. Since the adoption of the Core Strategy, the government have raised the affordable housing threshold to ten or more dwellings, to encourage building on small sites.
- 4.6 Core Policy CP30 requires all development to be of be high quality and design-led, having special regard to its context and should promote attractive, safe, accessible, inclusive and sustainable neighbourhoods. Core Policy CP31 relates to Built and Landscape Heritage and the Council will seek to pro-actively preserve and enhance all of the Borough's heritage assets. Developments that impact on heritage assets shall have regard to their special character and be based on an understanding of their context.

Development Management Document (November 2014)

- 4.7 The site is located within the defined local shopping centre on Lancaster Road on the proposals map and is not subject to any other site-specific land-use policies.
- 4.8 Policy DMD2 seeks a financial contribution to deliver off-site affordable housing on all developments of less than 10 units, but has similarly been superceded by the government's policy threshold.

- 4.9 Policy DMD5 relates specifically to the conversion of existing dwellings into self contained flats, but the supporting text recognises that conversions play an important role in increasing housing supply. In so far as it relates to the provision of new units, it requires all new development to provide a high quality form of accommodation which meets internal floor space standards in the London Plan.
- 4.10 Policy DMD6 requires that the scale and form of development is appropriate to the existing pattern of development or its setting and achieves a high quality of design and standard of accommodation. The density of development should take account of existing or planned transport capacity as well as the provision of local facilities such as shops, public and private open space, and community, leisure and play.
- 4.11 Policy DMD8 prescribes General Standards for New Residential Development which should be appropriately located; of an appropriate scale, bulk and massing; preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance; meet or exceed minimum space standards; have a well-designed, flexible and functional layout; meet Lifetime Homes Standards; provide high quality amenity space; have adequate access, parking and refuse storage; not dominate the appearance of the street frontages with hardstandings; and not dominate or cause harm to the character or appearance of the property or street through boundary treatment.
- 4.12 All new development should achieve Good Design which is appropriate to its context and has appropriate regard to its surroundings in accordance with Policy DMD37.
- 4.13 Policy DMD44 deals with conserving and enhancing Heritage Assets. Development which fails to conserve and enhance the special interest, significance or setting of a heritage asset will be refused. This should take account of the design, materials and detailing of the development which should be presented in a Heritage Statement.

The London Plan

- 4.14 The London Plan Spatial Development Strategy for Greater London (2016) is the overall strategic plan for greater London which sets out an integrated economic, environmental, social and transport framework for the development of London over the next 20-25 years.
- 4.15 The Mayor has identified through the London Plan and accompanying SPGs the acute need for more homes to be built in London. Recent census figures reveal that London has grown by 12% since 2001, with an increase of approximately one million people above that which was projected. The population is also expected to grow by a further one million people up to 2020.
- 4.16 The Mayor's plan recognises the need for housing on the limited stock of land, through especially recycling the Brownfield land currently in existing use and through the setting of minimum housing supply targets for each borough until 2026.
- 4.17 Policy 3.3 explains the need for each London Borough to increase their housing stock in order to meet future change in population and to provide Londoners with a proper choice of housing. The policy explains that the reuse of Brownfield sites, mixed-use schemes and the intensification of land should be encouraged.

4.18 The following other policies of the London Plan 2016 are relevant to this proposal:

- Policy 7.4: Local Character
- Policy 7.6: Architecture
- Policy 3.5 Quality and Design of Housing Developments
- Policy 4.7 Retail and Town Centre Development
- Policy 7.2: An Inclusive Environment

National Planning Policy Framework

- 4.19 Chapter 5 of the NPPF underlines the Government’s objective of boosting the supply of homes, encouraging land to be brought forward where it is needed, including an assessment of the size, type and tenure needed for different groups in the community.
- 4.20 The contribution from small and medium sized sites is recognised, and local authorities are encouraged to support the development of windfall sites. Para 118 states that local authorities should give substantial weight to the use of brownfield land for homes and support the development of under-utilised land and buildings.
- 4.21 Paragraph 124 explains that the Government attaches great importance to the design of the built environment, and further that good design is a key aspect of sustainable development. New development should function well and add to the overall quality of the area over its lifetime. Good architecture should be visually attractive, and development should be sympathetic to local character and history, whilst not preventing or discouraging innovation and change.
- 4.22 Chapter 16 addresses the need for conservation and enhancement of the historic environment. Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 4.23 Paragraph 190 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.
- 4.24 Paragraphs 195 & 196 deal with assessing the impact of a proposed development on the significance of a designated heritage asset. Where harm does occur, but this is “less than substantial”, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Alternatively, where a development leads to “substantial harm” or “total loss of significance”, LPAs should refuse consent unless substantial public benefits outweigh that harm or loss.

5 PLANNING ISSUES

Residential Use

- 5.1 The location is highly accessible and new residential development in this location will contribute to an attractive, safe, accessible, inclusive and sustainable neighbourhood in accordance with Core Strategy Policy CP30 and the aims of the London Plan.
- 5.2 The proposed apartment exceeds minimum space requirements and provides a high quality, spacious form of accommodation which can accommodate a family or two people/couples sharing. It will accord with Development Management Policies DMD5 and DMD6 at a density which reflects the site's location, close to local services and facilities.
- 5.3 The use of the first floor as residential is compatible with the use and character of the rest of the building and with the surrounding area, and would make a modest contribution to meeting the need for new housing in the district. Modern forms of noise insulation would ensure that there was no breakthrough to/from the existing residential and retail uses such that there would be an adverse effect on the amenity of existing or new residents.
- 5.4 The proposal reflects the requirements of Policy DMD8 in terms of its design, amenity and relationship with surrounding properties. Although there is no private outdoor space proposed, the apartment would have its own access and provision for sitting-out at the rear of the building if required. Wheeled refuse bins and cycles can be accommodated beside the building at ground floor level.
- 5.5 For these reasons, it is considered that the proposed development accords with existing Core Strategy and Development Management policies and contributes to sustainable development in accordance with the provisions of the London Plan and the NPPF.

Design & Appearance

- 5.6 The external alterations required to accommodate the new apartment are relatively limited in the overall context of the building, which is a substantial two-storey property with high eaves and a tall pitched roof.
- 5.7 Dormer windows have been selected on the rear/side of the building, in less prominent locations, and are characteristic of similarly extended properties in the local area, including at No. 196 Lancaster Road, No. 237 Chase Side, and at properties on Batley Road, all of which back onto the the same area at the rear of the application property. At the front of the building, less-imposing rooflights are proposed, reflecting the absence of dormer windows fronting onto Lancaster Road elsewhere in the near vicinity.
- 5.8 The staircase addition on the eastern flank wall is not in a prominent location, and is largely concealed by the host building and the adjoining property at 198 Lancaster Road. It simply extends the existing ground floor lobby up to second floor level on almost the same footprint and has been designed with a small roof structure incorporating a pitch and materials to match the existing building.
- 5.9 In this way the development accords with Development Management Policies DMD5 & DMD6.

6 HERITAGE ASSESSMENT

- 6.1 The relevant tests set out in Statute, the Development Plan and Planning Policy all point in the direction of the preservation of Listed Buildings, their setting or any features of special architectural or historic interest.
- 6.2 In assessing the impact of the proposal, it will be necessary to establish what, if any, harm to the heritage assets will occur as a result of the proposed development; and whether, or to what degree, this can be considered “substantial”.
- 6.3 If substantial harm is found, then it will be necessary to determine whether there are exceptional circumstances or substantial public benefits which outweigh that harm.

The Listed Buildings

- 6.4 Brigadier House stands as a modest yet attractive private house in what has now become the built up part of northern Enfield.
- 6.5 Built in the early eighteenth century at the junction of Chase Side (forming the eastern boundary of Enfield Chase, a former royal hunting ground) with New Lane (later Lancaster Road) it added to a cluster of buildings dating from the late seventeenth century. It probably pre-dated the original Holly Tree Inn, built around 1750. The walls and railings are believed to be contemporaneous and are separately listed.
- 6.6 Set at the rear of an amply-sized and well-planted plot, the house is not conspicuous in the streetscene, which is otherwise characterised by densely developed nineteenth century housing to the east and twentieth century development to the west. An attractive landscaped area occupies the wide pavement in front of the railings on Brigadier Hill containing a trough inscribed “BE KIND AND MERCIFUL TO ALL ANIMALS”, of a type commonly found in public locations and unlikely to be original to this location.
- 6.7 The value and special interest of the Listed assets seems to be predominantly in their historic, rather than their architectural, interest, as the house is of only limited design interest and the boundary wall is no longer in a fine original condition, having been repaired in a number of areas and buttressed towards its eastern end.
- 6.8 The proposed development will have no direct impact on the listed buildings their historic interest or their continued preservation.

Setting of the Listed Buildings

- 6.9 The proposed development involves the provision of one additional apartment in a building which is already occupied by two dwellings and a retail unit and located in a mixed residential/commercial area. It is not considered that the use of the existing second floor attic area, or any comings and goings associated with it, will have any material impact on the setting of the listed buildings.
- 6.10 Externally, the proposed alterations are limited to two dormer windows, the replacement of a valley in a double hipped roof, four rooflights and a staircase structure at first/second floor level.

- 6.11 The dormer windows are of a scale and proportion which is not uncommon in the area, and which will not be overbearing in the context of the existing building. One of the dormer windows, on the west side of the roof structure, will be visible in some longer views of the listed buildings from Lavender Hill and Chase Side to the west of the application site, although it is set back from the Lancaster Road frontage behind an existing hipped roof. From this direction, views of the listed buildings are dominated in any case by the flat-roofed dormer windows on the rear elevations of houses in Radcliffe Avenue.
- 6.12 The replacement of the double-hipped roof at the rear of the property is not visible from any publicly accessible locations. Even in glimpsed views between buildings from Laurel Bank Road, the rear part of the application site is largely obscured by mature garden trees.
- 6.13 The proposed rooflights on the front roof plane of the building facing Lancaster Road are also characteristic of other examples in the nearby area, including at 196 Lancaster Road and 190 Lancaster Road. They are set high-up on the roof plane and in line with the sash windows at first floor, below. They are not prominent features in views of the application site, and will be barely noticeable in views to or from the listed buildings.
- 6.14 The staircase extension is located on a tertiary elevation, largely obscured by the existing building and the adjacent building at 198 Lancaster Road. It will not be visible at all in views to/from the east and west on Lancaster Road. The only location from which it will be seen is in views of the site from the north in Brigadier Hill, including oblique views of the listed wall and railings. From this direction the staircase will appear as a minor addition to the host building, simply reflecting the subordinate, single-storey elements which already exist to the east and west at ground floor level.
- 6.15 For the reasons set out above, it is not considered that the proposed development will materially affect the preservation of either of the Listed Buildings, their setting or any features of special architectural or historic interest to the extent that they would cause anything other than “less than substantial” harm.
- 6.16 The proposal therefore accords with Development Management Policy DMD44 and the NPPF.

7 CONCLUSIONS

- 7.1 This statement has been prepared to accompany an application for Planning Permission for a new dwelling unit in the loft/attic space at 200 Lancaster Road, following its conversion from a public house to a Co-op convenience store with two apartments above.
- 7.2 The application site is not statutorily or locally listed and is not in a conservation area, but is located close to Grade II listed buildings comprising Brigadier House and the walls/railings surrounding its garden. This part of Enfield is otherwise characterised by nineteenth and twentieth century houses and shops on Lancaster Road.
- 7.3 The conversion of the second floor to an apartment involves minor alterations to the building comprising the infilling of a section of roof, provision of dormer windows and rooflights, and the construction of a staircase element on the eastern flank wall.
- 7.4 The new apartment is an appropriate use in this accessible location, which is close to public transport, shops, services and facilities. It will provide a good standard of accommodation, in excess of minimum space standards and the external alterations proposed are in character with the existing building and its surroundings.
- 7.5 The impact of the proposals have been examined against the relevant statutory, local and national tests, the crux of which is whether the proposals serve to preserve nearby Listed Buildings, their setting or any features of special architectural or historic interest. Where there is an impact on one of the designated heritage assets, it is determined whether harm is caused, and if so, whether this can be considered “less than substantial”.
- 7.6 Very little or no impact is anticipated in relation to the listed buildings. The use of the property and alterations to it are not prominent, nor do they impinge on the listed buildings’ setting. It is apparent that the proposal meets the statutory tests and accords with the development plan and the NPPF, which is an important material consideration.
- 7.7 In the circumstances, it is considered that planning permission should be granted without delay.