

**EWI Installation Works – 19 Leeds
Street, London N18 2AB**

Heritage Statement

Newlon Housing Trust

21/03/2024

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Prepared in support of planning application for:

Existing external wall makeup to receive new External Wall Insulation.

At:

19 Leeds Street, London, N18 2AB.

1. Introduction and Summary of Proposal



Figure 1: Existing Front Elevation Photograph of 19 Leeds Street

- 1.1 This heritage impact assessment has been prepared on behalf of Newlon Housing Trust by Stace LLP. It relates to a proposal for EWI installation works to the external walls of the property known as 19 Leeds Street, London, N18 2AB.
- 1.2 This statement is written in support of a Full Application for the proposed works to tackle Newlon Housings decarbonisation scheme which requires their existing properties EPC rating to be increased.
- 1.3 19 Leeds Street is not a listed building, nor within a conservation area. But resides nearby (50m) the conservation area 'Fore Street Edmonton'.
- 1.4 This statement should be read in conjunction with all Stace drawings submitted as part of the application.
- 2024_0794_LS01 – 19 Leeds Street – Site Location Plan
 - 2024_0794_LS02– 19 Leeds Street – Block Plan
 - 2024_0794_LS03 – 19 Leeds Street – Existing Elevation
 - 2024_0794_LS04 – 19 Leeds Street – Proposed Elevation

- 1.5 The proposed works are in direct relation to installing a 150mm thick External Wall Insulation system to mitigate any cold bridging within the property in an attempt to increase the EPC rating of the property. The proposed system is a silicone heck wall system with a silicone render finish, colour is to match the nearby existing properties.
- 1.6 With regard to less than substantial harm to a heritage asset, the NPPF states: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. We propose to carry out works which will not directly affect the street scene as multiple along the terraced row and adjacent properties have already received a render coating system.
- 1.7 These proposals are considered to constitute less than significant harm, which may be positively balanced against Public Benefit, in line with NPPF (2018).
- 1.8 We are duly proposing to enhance the asset, in that the durability and security of the property will be extensive installation works to the existing elevations and new decorative works. We believe the proposals will not cause harm or loss of the heritage asset; we further point out that the proposals achieve a public benefit to better suit the adjacent properties.

2. Site and Surroundings

2.1 The location of site is shown in Figure 2 below. The London Borough of Enfield are the determining authority.

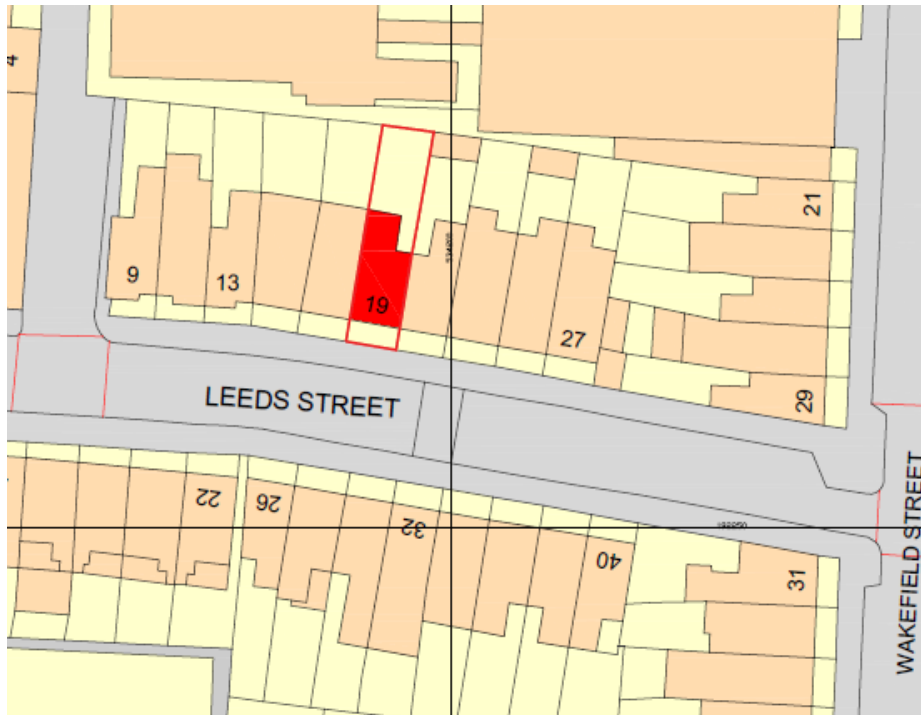


Figure 2: OS map sourced from Promaps website.

2.2 The below satellite images depicts the property.

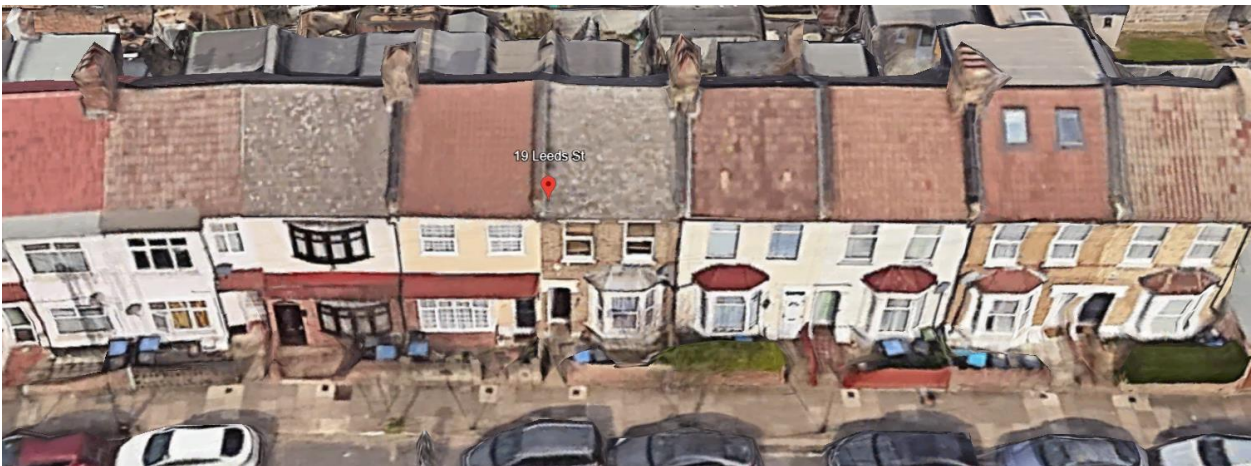


Figure 3: Satellite images sourced from google maps 3D viewer.

3. Relevant Planning History

3.1.1 There are no previous successful planning permission for the property known as 19 Leeds Street. Please find the previous applications listed as below;

Case Number	Address and details	Decision Date
19/01852/FUL	25 Leeds Street, London, N18 2AB Change of use from single family dwelling (Class C3) to house in multiple occupation (HMO) accommodating up to 6 people (Class C4).	17-05-2019
18/04043/CEA	25 Leeds Street, London, N18 2AB Rear dormers with front rooflights together with single storey rear extension.	19-11-2018

4. Legislative and Historical Background

4.1 Planning (Listed Building & Conservation Areas) Act 1990

4.1.1 The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 require the decision maker to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.

4.1.2 There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.

4.2 National Planning Policy Framework (NPPF)

4.2.1 For the purposes of this statement, preservation equates to an absence of harm. Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.

4.2.2 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

4.2.3 The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either "substantial harm" or "less than substantial harm" as described within paragraphs 195 and 196 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in

terms of an effect that would vitiate or drain away much of the significance of a heritage asset. The Scale of Harm is tabulated in Figure 3.

4.2.4 The NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

Heritage Collective, 2019

Figure 3: Scale of Harm Table – Heritage Collective, 2019

4.2.5 Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

4.2.6 With regard to **less than substantial harm** to a heritage asset, the NPPF states: Where a development proposal will lead to less than substantial harm to the significance of a designated

heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

4.2.7 Further commentary on scale of harm is discussed in Section 5.3.2 below.

4.3 Relevant Policies

4.3.1 Local Plan Policy LP33

4.3.1.1 The Local Plan Policy LP33 has due regard for a Structural Impact Assessment, where affecting the heritage elements of an asset.

4.3.1.2 The policy calls for contributions towards the conservation, restoration, and enhancement of the historic environment.

4.3.1.3 In our case, although the property is not considered a heritage asset, it resides nearby to a conservation area. The installation of the EWI system is considered an enhancement to the property and mutually beneficial. The proposed makeup is a silicone render heck wall system, with the colour proposed to suit the existing street scene.

4.3.2 The London Plan

4.3.2.1 The London Plan Policy explains:

‘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.’

4.3.2.2 In compliance with the London plan, we have stayed true to a sympathetic design, in regard to scale, materials and architectural detail.

5. Statement of Significance

5.1 Listing Description and Details

5.1.1 The property known as 19 Leeds Street is not listed, and therefore does not have a listed building entry number.

5.2 Conservation Areas

5.2.1 The property known as 19 Leeds Street does not reside within any conservation areas, although it is located nearby the Fore Street Edmonton Conservation area.

5.2.2 The location of the conservation area is southeast of the Enfield County borough, a mere 2 and a half miles from Enfield Town. Fore Street runs north-south approximately parallel to and about 1 and a quarter mile west of the River Lea.

5.3 Proposals and Potential Impact

5.3.1 Proposals

- 5.3.1.1 The proposals set out in the application concern the external façades. Proposed works are the installation of a coloured Silicone EWI render system.
- 5.3.1.2 The Proposal include for the installation of External Wall Insulation (EWI) enhancing both tenant comfort and thermal efficiency in line with Building Regulations Approved Document L, as well as protecting and improving the general condition of the building's fabric. The proposed EWI system is 150mm deep with abutments nearby window openings and door openings. Colours for the proposed system are vast, and therefore proposed on a property specific colour to mitigate a dramatic change to the existing street scene.

5.3.2 Potential Impact and Scale of Harm

- 5.3.2.1 The application proposals will change the external appearance of 19 Leeds Street. These proposed replacement changes will not cause heritage harm to its overall heritage significance for the following reasons:
- 5.3.2.2 Regarding less than substantial harm to a heritage asset, the NPPF states: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 5.3.2.3 The proposal will have limited negative impact on the building's setting, as the elevations will receive a facelift whilst mutually benefiting the tenant and landlord.
- 5.3.2.4 The Proposal include for the installation of External Wall Insulation (EWI) enhancing both tenant comfort and thermal efficiency in line with Building Regulations Approved Document L, as well as protecting and improving the general condition of the building's fabric. The proposed EWI system is 150mm deep with abutments nearby window openings and door openings. Colours for the proposed system are vast, and therefore proposed on a property specific colour to mitigate a dramatic change to the existing street scene.

6. Age & Condition

- 6.1.1.1 The windows set out in the application for the property are believed to have been installed retrospectively. The windows are expected to be approximately 5-10 years old, the windows are double glazed uPVC and are in fair condition with no cracked frames or glazing.

7. Considered Repairs & Material Selection

- 7.1.1.1 We have considered the nature of the property and if the repairs proposed are suitable. Largely the brickwork is in fair condition, but with signs of wear and tear, with chalk markings and potential rising damp at low level, the proposed works are to mitigate these issues by rectifying the visible salts and damp by covering the external elevations, colours of the silicone render finish is to be suitable to the locality of the property.

8. Conclusion

8.1.1 Closing Comments

- 8.1.1.1 The proposed works are largely beneficial to the property, the works directly affect the EPC rating of the property and once installed the efficiency of the building should be influenced for the betterment of both landlord and tenant. With this future maintenance issues will be limited and therefore issues with lack of residential maintenance through a suitable planned maintenance schedule will not present as a further issue to consider.
- 8.1.1.2 Overall, the minor harm is outweighed by the potential benefit.

9. Photos



Photo 01 – Existing Front Elevation



Photo 02 – Existing Rear Elevation



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