

2nd September 2021

Strategic Planning and Design

Enfield Council

FREEPOST

NW5036

EN1 3BR

Dear Sirs

Local Plan - Site SA45 – Land between Camlet Way and Crescent West, Hadley Wood

I own 85 and 87 Camlet Way, which are both Grade II listed buildings in a single designation and directly back onto the land that is subject to the proposed housing allocation. I have lived in Hadley Wood for most of my life and my children all attended the pre-school and local primary school. I am astonished at the proposal to remove the land to rear of my properties from the green belt.

I have never previously objected to a planning application in the area, nor a draft Local Plan, but feel compelled to do so now, given the huge impact this development will have on my properties and the setting to these heritage assets.

I therefore wish to OBJECT to the proposed release of “Site SA45 – Land between Camlet Way and Crescent West, Hadley Wood” from the green belt and its proposed allocation for development into 160 residential units.

Historical Context

The land that forms part of the housing allocation have been owned by the Sovereign since 1399, and by Norman Barons and Saxon Lords of the Manor beforehand. The hedge along the north-west edge of the site marked the boundary between the Saxon Manors of Enfield and South Mimms and between the now ceremonial counties of Middlesex and Hertfordshire since the ninth century.

Before the Battle of Barnet in 1471, the Yorkist army marched through the field and tore down the palisade surrounding the deer park in Enfield Chase. Lancastrian cannonballs and arrows were fired in retaliation, and these will remain in the ground, which is why the land falls within an Area of Archaeological Importance.

By the Act of Disenchantment in 1777, George III divided his entitlement to Enfield Chase into plots for sale as agricultural leases. The outer parts of the Chase Estate were distributed to the surrounding parishes. In 1882 the Duchy of Lancaster, converted the agricultural leases around the new railway station, in what became Hadley Wood, into building leases, leading to the construction of the houses in the Conservation Area in characteristic styles. The land west of Crescent West, including the proposed allocated site, was retained within an agricultural lease. After the building leases expired, the land around the station that had not been built on was sold by the Duchy of Lancaster to Enfield Council in 1944, facilitated by the Green Belt Act of 1938. This became the Open Space, including Bartrams Lane field and the tennis courts which are occupied by the Hadley Wood Association.

The agricultural lease identified in allocation SA45 is the only open land in Hadley Wood that remains in the freehold interest of the Duchy of Lancaster and was historically left as rough pasture to provide a green setting to all the properties backing onto it.

Looking at historic OS maps it is very clear that the land forms a series of field parcels, that remain broadly consistent throughout the maps, providing evidence that the field boundaries surviving on the land today are a historic landscape feature.

Planning Context

The proposed site allocation is sited to the north of Camlet Way and Crescent West, immediately adjacent to the Monken Hadley Conservation Area (London Borough of Barnet) to the west and Hadley Wood Conservation Area to the east. Part of the site is within the Hadley Wood Conservation Area boundary. The properties at 83, 85 and 87 Camlet Way are all Grade II listed buildings and all back onto the site, whilst 83 and 85 will also immediately adjoin a proposed access point into the site.

The National Planning Policy Framework (NPPF 2021) sets out clear guidance for plan-making with reference to the historic environment. Paragraph 190 states that Local Plans should set out a positive strategy for the conservation of the historic environment that should take account of the desirability of sustaining and enhancing the significance of heritage assets,

Historic England's Advice Note 3 "The Historic Environment and Site Allocations in Local Plan" provides guidance of the process for allocating sites for development in Local Plans. This sets out a five-step process to follow:

STEP 1 Identify the heritage assets affected

STEP 2 Understand the contribution the site makes to the significance of the heritage assets.

STEP 3 Identify the impact the allocation may have on that significance

STEP 4 Look to maximise enhancements to avoid harm

STEP 5 Determine whether the proposed site allocation is appropriate

Historic England's Advice Note 3

STEP 1 Identify the heritage assets affected

The site borders two conservation areas: the Hadley Wood Conservation Area in the London Borough of Enfield, and the Monken Hadley Conservation Area in the London Borough of Barnet. The Council did not identify the Monken Hadley Conservation Area, when undertaking this Step 1, which is a major error. The Council only looked at heritage assets within the borough boundary and ignored an important heritage asset directly adjacent to the site, because it was in a different London borough. Therefore, if Step 1 is not applied correctly, Steps 2 to 5 will be incorrectly applied as they would have been based on the wrong information to start with.

There is a cluster of three listed buildings:

- Number 83 and attached wall, gatepier and gate (Grade II), NHLE 1079464 9
- Number 85 Camlet Way Pegasus (Grade II) NHLE 1358748 (my property)
- Number 87 and attached wall, gatepier and gate (Grade II), NHLE 1241164 (my property)

STEP 2 Understand the contribution the site makes to the significance of the heritage assets.

The significance of a heritage asset is the sum of its archaeological, architectural, artistic and historic interest. Significance derives not only from the heritage interests of the asset itself, but also from the contribution made by its setting. The setting of a heritage asset is defined in the NPPF as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

Hadley Wood was designated as a conservation area in 1989, with the Conservation Area Character Appraisal being approved in 2015 and amended in 2016. The appraisal summarises the special interest of the conservation area as:

- The historic significance of the area in the development of the Borough of Enfield – Hadley Wood provides physical evidence of the transformation of Enfield from a largely rural area to a suburban one in the late 19th and early 20th centuries. It is also of interest in itself as an example of an exclusive, high-status development.
- The original vision of Charles Jack – Jack’s vision of a prestigious, leafy suburb, consisting of high-quality, well-built properties set around a new station, survives largely intact.
- Street greenery – The abundance of street trees and the well-planted front gardens of many properties give the area a pleasant, green and leafy atmosphere, which is enhanced by the informal treatment of boundaries.
- The spacious feel of the area – This is attributable to the wide roads with open sky above, a set-back building line and generous front gardens.

- The discipline provided by the planned layout of the area – Despite the significant amounts of greenery and informal architectural style of most of the buildings, a clearly conceived layout is evident in the regular building line and relatively consistent size and height of the houses, which provides the area with an overall sense of order and gentle discipline.
- The architectural style of the buildings – The consistent architectural style within each of the principal roads gives a strong sense of cohesion. At the same time, subtle variations in detailing and massing add visual interest to the area.
- The design quality of the buildings – The properties are generally carefully designed and well built, with interesting massing and handsome, well-proportioned façades. Strong and lively rhythms are set up by the repetitive use of features such as bays and gables.
- The quality of architectural detailing and materials – Most of the properties, and particularly their joinery, are detailed to a very high standard, and they are built of good quality materials that significantly enhance their appearance.

The Appraisal makes specific reference to the relationship that the conservation area shares with its wider rural surroundings where it states *“Initial impressions of the area are of spaciousness and informality, created by the gently winding roads, variety of house types and the ever-present greenery. This consists of a variety of mature street and garden trees and patches of open land punctuating the housing with occasional views to the open countryside, giving the area a pleasant, leafy ambience. Generous roads and pavements complement the feeling of spaciousness and the lack of traffic, and the small number of pedestrians lend the area a quiet, almost serene, atmosphere.”*

The character of the site therefore as open countryside makes an important contribution to the significance of the conservation area by reinforcing the character of having housing within a rural setting and contributing to its sense of greenery.

The Monken Hadley Conservation Area Character Appraisal Statement was adopted in January 2007. It states that

“Monken Hadley is still very green and leafy in character and remains at a low built density. Its special character stems from development in the 18th and 19th centuries”.

“Over half the Conservation Area is open fields and recreational land, which is also covered by the designation of Green Belt.”

“The whole Conservation Area was historically rural with built development being introduced mainly as residences for the Georgians and Victorians. Later Green Belt policy has also helped to preserve the agricultural landscapes.”

Therefore, it is clear from reading the Appraisal Statement that part of its significance is derived from the vestiges of open space and agricultural land.

The Appraisal Statement also describes the area immediately adjacent to the western boundary of the allocation site as *“The land to the north of the properties in Camlet Way and area five is almost completely undeveloped agricultural land, included in the Green Belt. There are clear field boundaries seen in area six to the northern-most tip of the Conservation Area. Rectory Farm (which is to the rear of the Convent school) has become derelict and indeed at the time of writing contains a series of dilapidated sheds and outbuildings. An assessment of the landscape around the farm has shown that*

this is historic, characterised by ponds and small fields. The field boundaries are long established, as evidenced by hedgerows and hedgerow oaks. It is likely that the field patterns reflect early enclosure which makes them of considerable historical significance. There are also extensive areas of Tree Preservation Orders around Rectory Farm."

The character of the allocation site shares many of the same attributes as the land within the conservation area, with historic field boundaries and having the character of pastoral grazing land. Its undeveloped, rural character reinforces the rural character of the land within the conservation area and can only be considered to be a positive element of the setting that contributes to an understanding and appreciation of Area Six of the Monken Hadley Conservation Area.

My properties are Grade II listed buildings and therefore are of national special architectural and historic interest. The listing detail for the property "No. 87 and attached wall, gate pier and gate" (listed in 1991) reads as follows:

"Former estate cottage, with attached wall, gate pier and gate. Probably 1878, as Nos 89-91 (qv). Brownish brick in English bond; 1st floor tile hung, with elaborate bands of fish scale tile; decorative timber-framing with plastered infill to gables. Plain tile roof with crested ridge tiles and gable finials. Ribbed brick chimneys with deep stepped caps. 2 storeys, 3 bays. In Vernacular Revival Style, having chamfered plinth; stepped dentilled 1st floor band; board doors with small-pane glazing at top; small-pane wooden casement windows, those on ground floor with segmental brick arches and offset tile sills, projecting, gabled, central bay, corbelled on 1st floor, has steps up to off-centre internal porch, which has 4-centred each with stone imposts. Windows of 3,2,3 lights to ground floor; 1,3,2 lights above. External stack at right end; ridge stack between left-hand bays. Wall attached to front right corner, approx 4.5 metres long and 2.5 metres high, has chamfered ashlar coping and terminates in octagonal pier which has moulded ashlar offsets and cap supporting decorative iron lantern; attached to pier is a leaf of decorative iron gate. Right return of cottage: decorative ashlar plaque to stack which is flanked by 1-light windows. Interior not inspected. The cottage served the nearby Broadgates."

The significance of my listed building is derived principally from its architectural and historic interest as an example of domestic architecture in the Vernacular Revival Style which was fashionable towards the end of the 19th century. This is augmented further by their historic interest as cottages serving one of the nearby estates, providing evidence for the growth of Hadley Wood as a prestigious suburb.

My property with the adjacent listed buildings forms a clear group through their spatial arrangement as well as their shared architectural detailing. They were one of the first group of houses to be constructed on this section of Camlet Way, being originally surrounded by open land on all sides. Over the course of the 20th century, Camlet Way has become lined with detached houses which now creates a suburban character to this aspect of their setting. To the rear, their historic setting survives. The properties give way to open land comprising the draft allocation site with further rolling countryside beyond. The open character of this land is a historic survival of their formerly rural location and aids an understanding of the development of this area in the Georgian and Victorian periods as a prestigious and high-status suburb on the periphery of London. The rural character also complements the Vernacular Revival architectural design, reinforcing and making sense of their cottage-like character. The attributes of the site therefore make a positive contribution to an understanding and appreciation of the significance of the heritage assets.

STEP 3 Identify the impact the allocation may have on that significance

I have reviewed the Council's own conservation area appraisal, which highlights the importance of the green, rural character of the site to the setting of the conservation area. The site is specifically referenced in the supporting text as well as the townscape analysis map which identifies the view outwards from the conservation area boundary from Crescent West across the site as a key view. It must therefore be considered to contribute positively to the setting of the conservation area.

The proposed development of the SA45 site, from a quantum and scale of development being proposed would ruin the rural character of the site, including the rural outlook identified to be of importance to the conservation area in the Appraisal. It would replace the grazing land character with one of dense housing development, giving rise to a major fundamental change in the character of a substantial proportion of the last remaining area of open land immediately abutting the conservation area. This major change would neither sustain nor enhance the special interest of the Hadley Wood Conservation Area. In fact, it would erode the green outlook in these views' outwards from Crescent West as well as the remaining evidence of the 19th century transformation of Hadley Wood from rural land to prestigious suburb.

I can therefore only conclude that the development of this proposed allocated site for housing would in my opinion cause substantial harm to the special architectural and historic interest of my properties and the conservation area that would neither preserve nor enhance its character or appearance.

A significant proportion of the Monken Hadley Conservation Area is open, rural and has been determined by the London Borough of Barnet to contribute to its special architectural and historic interest. The allocated site shares these same attributes and contributes positively to an understanding and appreciation of the green, rural character of the land. Therefore, in its current form it must be considered a positive attribute of its setting. Enfield Council have not taken this into account as they forgot to include the Monken Hadley Conservation Area in any assessment. The erosion of its rural character in place of concreting over the fields would neither sustain nor enhance a positive attribute of the setting of this conservation area, but instead, in my opinion would result in substantial harm.

Whilst there are no views of the allocated site through the listed buildings, the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. The fact therefore that the site cannot be seen through the listed buildings is not considered a determinant in whether or not it contributes to their significance.

There is no convincing case that development on the allocated site would sustain the significance of my listed building. I believe the open character of the site is a vestige of their once rural setting which contributes positively to their significance as estate cottages in the Vernacular Revival style. The introduction of built form of this scale would likely result in substantial harm by virtue of the erosion of the rural character of the site and its replacement with a concrete housing estate.

STEP 4 Look to maximise enhancements to avoid harm

The impact of the development of the site for a housing estate would result in the loss of the existing green and open character of the land. Whilst developers may propose mitigation measures to lessen the severity of the impact, the delivery of 160 units will have a significant adverse impact by virtue of the fundamental loss of its undeveloped character.

STEP 5 Determine whether the proposed site allocation is appropriate

The NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This strategy should consider: the desirability of sustaining and enhancing the significance of heritage assets; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place. This is reinforced in the London Plan.

Enfield Council has prepared and adopted a heritage strategy for the positive ongoing management of the historic environment within the borough: *"Making Enfield: Enfield Heritage Strategy 2019-2024"*. This was adopted in 2019 and is therefore a material consideration in decision-making. It establishes a series of objectives and aims, including

- Continue to manage the Borough's heritage and its setting as appropriate to its significance through regulatory and planning functions and develop the instrumental value of heritage in place-making.
- The 'task' to achieve the objective makes clear that this includes decision-making at the strategic planning stages:
- Encourage sustainable and creative decision-making to conserve and enhance historic assets and their settings through strategic planning, Development Management and regulatory services.

The output makes clear the weight to be given to heritage assets at the strategic planning stages: *"Ensure that substantial weight is given to heritage assets and their settings in decision-making and strategic planning and through creative approaches to growth."*

The Council has identified in its own assessment the potential for an adverse impact, rating the site 'amber' in the initial assessment. In line with the Council's own adopted heritage strategy, substantial weight must therefore be given to heritage assets and their settings at the strategic planning stage.

I have also read the Cabinet report presented to the Councils' Cabinet in June, where the summary table for proposed allocated Site SA45 stated that the site overlaps the Conservation Area and that large-scale development could adversely affect the setting of these heritage assets.

The Council is only partly correct, in that the development of the proposed site for large scale housing development (160 units) would adversely affect the setting of these heritage assets, but the Council must recognise that the resulting harm from turning this green historic grazing site into a housing estate would be Substantial and not capable of mitigation.

I would therefore strongly urge the Council to retain the green belt in this location and remove the site allocation on heritage grounds.

Yours faithfully