241 Green Street

Enfield

TOWNSCAPE, HERITAGE & VISUAL IMPACT ASSESSMENT | JUNE 2020

On behalf of Stonegate Homes





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Section 1 Introduction.

1 Introduction

- Assessment (THVIA) has been developed to inform the design development and to assess potential impacts on heritage and townscape upon to support the full planning application for the redevelopment of 241 Green Street (the Site'). Following advice received from the Council at the first pre-application the scheme has gone through review and has taken the comments provided from the initial meeting, independent design review by the Enfield Design Review Panel and the GLA. Further discussions with the Council at the second pre-application in January 2020, with further revisions made to the proposed design.
- 1.2 The proposed development comprises full demolition of the existing buildings and erection of a mixed-use development ranging from 2 storeys to 16 storeys comprising 154 residential units in three blocks, together with flexible commercial floorspace (classes A1, A2, A3, B1, B2, B8, D1 and D2) at part ground / first floor levels and ancillary car parking, cycle parking, amenity areas, landscaping and associated development.
- 1.3 Neither of the two warehouse structures located at 241 Green Street are designated heritage assets, nor are they recognised to be locally listed. The Site also does not sit within any designated Conservation Area.
- 1.4 This THVIA has been informed by the Baseline to assist with the development of a new scheme for the Site, providing a full and detailed assessment of the history and development of the Site and its surroundings. It provides a detailed analysis of the identified designated heritage assets, the significance of the Site and the existing townscape character in which the Site sits.
- 1.5 The THVIA will:
 - Set out the relevant legislative and policy framework within which to assess the Site's townscape and heritage impact
- Provide a proportionate and robust analysis of the Site and surrounding area's historic development
- Offer a full description of the Site and identify relevant designated heritage assets

- Assess the significance of the Site and its contribution to the nearby heritage assets;
- Provide an assessment of the townscape character of the immediate and surrounding area, including a viewpoint study.
- · Assessment of the proposed development; and
- An impact assessment of the proposed development on the identified heritage assets and existing townscape with the support of a concise and comprehensive visual impact assessment.
- The existing Site and surrounding area was appraised during a site visit (January 2020), and a desk-based study was also undertaken, and an Ordinance Survey map regression.
- .7 The report is produced by Iceni Projects. Specifically, it is authored by Ailish Killilea BA(Hons) MSc IHBC, Associate- Heritage and Lucy Williams BA (Hons) MSc, Heritage Assistant.



Figure 1.1 Aerial view of the site (outlined in red)
Source: Google Maps

Section 2

Methodology, Planning Legislation, Policy & Guidance.

Methodology

2.1 The following methodology has been developed by Iceni Built Heritage & Townscape to assess the likely effects of a new development at this location on the local and wider townscape, on the significance of identified heritage assets and on the visual amenity of the people experiencing it.

Planning Legislation, Policy & Guidance

- The planning legislation, policy and guidance detailed within the following section, in particular the NPPF and the PPG, is considered when undertaking the assessments set out in this report and detailed further in this section. But of particular relevance for the purposes and nature of the assessments the following key policy and guidance is referred to:
 - GLVIA, Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (2013);
 - GLA, London View Management Framework (2012);
 - MHCLG, National Design Guide (2019);
 - · LB Enfield, Core Strategy (2010);
 - LB Enfield, Development Management Plan (2014);
 - Historic England, The Setting of Heritage Assets: Good Practice Advice in Planning Note 3; and
 - Historic England, Tall Buildings: Good Practice Advice in Planning Note 4.

Process of Assessment

2.3 The Site is assessed in the consideration of the its existing condition and its wider surroundings and how the aforementioned policies and guidance should be applied. A process of interrogation and development of understanding is informed by survey of the site and wider context, desk-based analysis, contributing to the existing baseline. An understanding of the constraints and opportunities of the site aids the design evolution of the proposed development and is used to assess the proposed development's potential impact on the existing environment.

2.4 Additionally, our approach integrates an assessment of townscape, heritage and visual impact. Therefore, we seek to understand both the townscape character and heritage assets that sit within the vicinity of the Site. An understanding of the significance of the identified heritage assets is required, and what contribution their setting makes to their significance, in order to understand the impact of the proposals upon them. A study of map regression, listed buildings and conservation areas in the vicinity of the Site and understanding how the Site relates to them allows us to develop a heritage baseline, alongside, and integrated with, the townscape baseline.

Heritage Impact Assessment

- 2.5 Methodologically, our approach is informed by Guidance from the Landscape Institute and IEMA, through our use of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA 3), and Historic England guidance, notably GPA2 'Managing Significance in Decision-Taking in the Historic Environment '; GPA3 'The Setting of Heritage Assets'; and 'Advice Note 4: Tall Buildings'.
- 2.6 Historic England's 'Advice Note 4: Tall Buildings' is of particular relevance to this assessment. The 2015 updated previous guidance by English Heritage and CABE, produced in 2007, and now further revision is currently under consultation to align with the recent National Design Guide (2019) to provide advice on the sustainable delivery of taller buildings. It includes context criteria for assessing tall building proposals, which have been considered when formulating our methodological approach here.

Assessment of Heritage Significance

- 2.7 The assessment methodology used here for assessing the significance of the identified heritage assets and their settings is as set out in Annex 2 of the National Planning Policy Framework. This proposes the use of three heritage interests historical, archaeological and architectural, and artistic in assessing what makes a place and its wider context special.
- 2.8 These interests are also used in the November 2017 consultation draft of Historic England's best-practice guidance document Conservation Principles.

 They replace the heritage values evidential

- [now archaeological], historical, aesthetic [now architectural and artistic], and communal [now part of historical] set out in the previous, 2008 version.
- 2.9 The definitions for these interests are included in the online Planning Practice Guidance:
- 2.10 Archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- 2.11 Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- 2.12 Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

Viewpoint Assessment

- 2.13 The Site and its townscape surroundings and setting were surveyed (January 2020), studied and researched, as set out in Chapters 3.0, 4.0 and 5.0 of this report. The purpose of which was to understand the significance held by the Site and its role within the established townscape in relation to national, regional and local policy and guidance on development within historic environment.
- 2.14 Following detailed discussions with the London Borough of Enfield (LBE), a total of 12 townscape views were agreed and the scope of which these viewpoints would be developed and presented as part of this submission, which are all to be verified and presented in rendered or wireline form. They represent a general spread of views which illustrate the urban relationships likely to arise between the

- proposed development, its surroundings, listed buildings, conservation areas and townscape character. The view positions represent 'maximum exposure / maximum conjunction' of the proposed development seen in context. Accurate Visual Representations (AVRs) of the proposed development have been created by incorporating a computer model of it accurately into surveyed photographs of the chosen views by visualisation specialists RockHunter. Of these 12 viewpoints, all were produced as AVRs. The methodology statement for the production of AVRs and is included at Appendix III of this report.
- The AVRs, considered together with the architect's drawings and Design & Access Statement, allowed assessment of the effects of the proposed development on the surrounding townscape, including heritage assets and any significance derived from their setting. The outcome of this assessment is set out in Chapters 7.0 and 8.0 of this report. The same material also allowed the consultancy to consider the proposed development's compliance with national, regional and local policy, incorporated within these assessments.
- impact of the proposed development for each view is provided at Chapter 8.0 of this report. It is acknowledged that the viewers of the images may have different responses to the appearance of the building, depending on personal aesthetic preferences. In consideration of this, the following assessment aims to provide the reader with objective evidence of the physical scale of the development, its visibility and likely appearance from key viewpoints. Professional opinion, which may be considered to be more subjective, provides a second stage of the assessment which has been applied also.
- 2.17 The visual assessment has been carried out with the use of the following representations for each view:
 - (i) Verified Render: an "existing view" surveyed photograph and a verified photorealistic "rendered" montage;
 - (ii) Verified Wireline: an "existing view" surveyed photograph and a verified wireline outlining the proposed massing;

- 2.18 The assessment commentary includes:
 - (i) a description of the existing view ('Existing");
 - (ii) a description of how the development will change the view ("Proposed"); and
 - (iii) a description of the effect of the development on the view ("Effect").
- 2.19 The assessment commentary accompanying each AVR is intended to provide a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of heritage significance and the setting of assets affected, together with the effects of the development upon them' in accordance with Historic England's recommendations in Note 3: The Setting of Heritage Assets (2017). The commentary often uses words and phrases to qualify the degree and nature of change or effect on human perception. The intention has been to use these qualifiers consistently and in accordance with general English language; the reader is encouraged to read and understand them in the context of the wider narrative about each view and the AVR in each case.
- 2.20 It is important to note that the written assessments are not assessments of the photographs and photomontages in the document, but are assessments of the view as experienced from the actual viewpoint in a 'real-life' sense. The assessor has therefore visited each viewpoint. It is recommended that the reader of this document visits each viewpoint to fully understand how the development affects the setting and context of each respective view. Photographs are an inadequate means to replicate the sight of the human being. They are, however, our only means to illustrate the effect on paper and should only be used as a tool for assessment.
- 2.21 The principal role of this report is to provide a robust assessment on the existing townscape and heritage and the likely impact of the Proposed Development on the overall character and appearance of Brimsdown, focusing on the more sensitive elements of existing fabric and areas where the proposed development would be most visually exposed. We provide these assessments on townscape, heritage and visual aspects as an informed qualitative assessment which present results of the consultant's independent professional advice which has been provided throughout the design process.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 2.22 Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
- Primary legislation under Section 66 (1) of the Planning (Listed Buildings and Conservation Area) Act 1990 (PLBCAA 1990) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or Secretary of State, as relevant, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.

National Planning Policy Framework (July 2018, updated February 2019))

- 2.24 In July 2018, the government published the updated National Planning Policy Framework ("NPPF), with minor updates in February 2019. This maintains the focus on the 'golden thread' of sustainable development that was established as the core of the previous, 2012, NPPF.
- 2.25 This national policy framework encourages intelligent, imaginative and sustainable approaches to managing change. Historic England has defined this approach, which is reflected in the NPPF, as 'constructive conservation': defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment' (Constructive Conservation in Practice, Historic England, 2009).
- 2.26 Section 12, 'Achieving well-designed places', reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in paragraph 127, the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- 2.27 The guidance contained within Section 16, 'Conserving and enhancing the historic environment', relates to the historic environment, and developments which may have an effect upon it.
- 2.28 Heritage Assets are defined in Annex 2 of the NPPF as:
 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).' Listed buildings and Conservation Areas are both designated heritage assets
- 2.29 'Significance' is defined as 'The value of a heritage asset to this and future generations because of its

- heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.'
- The 'Setting of a heritage asset' is defined 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.'
- 2.31 Paragraph 187 requires local authorities to maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to assess the significance of heritage assets and the contribution they make to their environment.
- Paragraph 189 states that, when determining applications, local planning authorities should require applicants to describe the significance of the heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance. According to Paragraph 190, local planning authorities are also obliged to identify and assess the significance of any heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.
- Paragraph 192 emphasises that local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 2.34 Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great

weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and notes that this great weight should be given irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

- 2.35 Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 2.36 Paragraphs 195 and 196 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (as per Paragraph 195). Whereas, Paragraph 196 emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.
- 2.37 Paragraph 197 requires a balanced judgment for proposals that affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.38 Paragraph 200 encourages opportunities for new development within, and within the setting of, Conservation Areas and World Heritage Sites. Meanwhile, Paragraph 201 notes that not all elements of Conservation Areas and World Heritage Sites will contribute to their significance, but that, if harm to their significance is caused, decisions should follow the balancing exercise set out in paragraph 195 or 196, as appropriate.

Planning Practice Guidance ("PPG") (Ministry of Housing, Communities and Local Government, last updated July 2019)

- 2.39 The guidance on Conserving and enhancing the historic environment in the PPG supports the NPPF.
- 2.40 Paragraph 002 states that conservation is an active process of maintenance and managing change that requires a flexible and thoughtful approach, and that neglect and decay of heritage assets is best addressed through ensuring that they remain in active use that is consistent with their conservation.
- 2.41 Paragraph 006 sets out how heritage significance can be understood in the planning context as archaeological, architectural, artistic or historic, defined as follows:
 - archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
 - historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.
- 2.42 The PPG emphasises in paragraph 007 the importance of assessing the nature, extent and importance of a heritage asset in understanding the potential impact and acceptability of development proposals.

- Paragraph 018 explains that, where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. It goes on to state that whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.
- 2.44 Harm may arise from works to the heritage asset or from development within its setting. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- The PPG also provides clear guidance in paragraph 020 on the meaning of 'public benefits', particularly in relation to historic environment policy, including paragraphs 193 to 196 of the NPPF. The PPG makes clear that public benefits should be measured according to the delivery of the three key drivers of sustainable development: economic, social and environmental outcomes, all of which are reflected in the objectives of the planning system, as per Paragraph 8 of the NPPF. Public benefits include heritage benefits, and do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

National Design Guide, 2019

- 2.46 In September 2019, the Ministry of Housing,
 Communities and Local Government (MHCLG)
 produced a National Design Guide illustrating how
 well-designed places that are beautiful, enduring and
 successful can be achieved in practice. It forms part
 of the Government's collection of planning practice
 guidance, alongside the separate planning practice
 guidance on design process and tools.
- 2.47 The Guide recognises that well-designed places have individual characteristics which work together to create its physical Character. It introduces 10 specific characteristics that would need to be considered when considering new development. These are:
 - Context An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments.
 - Identity The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses.
 - Built form Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics.
 - Movement Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy. They also form a crucial component of urban character.
 - Nature Nature contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places.
 Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.

- Public spaces The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements.
- Uses Sustainable places include a mix of uses that support everyday activities, including to live, work and play. They need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities.
- Homes and buildings Well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences.
- Resources Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change. It identifies measures to achieve: mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and; adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.
- Lifespan Well-designed places sustain their beauty over the long term. They add to the quality of life of their users and as a result, people are more likely to care for them over their lifespan. They have an emphasis on quality and simplicity.
- 2.48 MHCLG further intend to publish a National Model Design Code, setting out detailed standards for key elements of successful design. This will intend to consider the findings of the Building Better, Building Beautiful Commission and recommendations to the Government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods.

- 2.49 The Guide acknowledges that quality design does not look the same across different areas of the country, for instance, that by definition local vernacular differs. MHCLG, therefore, expects that local planning authorities develop their own design codes or guides, taking into consideration the National Model Design Code. These would be expected to set clear parameters for what good quality design looks like in their area, following appropriate local consultation.
- In support of Paragraph 130 of the National Planning Policy Framework, which states requires local authorities to refuse "permission for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides"; MHCLG expects that in the absence of local design guidance, local planning authorities will defer to the illustrated National Design Guide and National Model Design Code.

The London Plan

Regional policy for the London area is defined by the London Plan. The Draft New London Plan has been out for consultation and is has undergone review in an Examination in Public by the Planning Inspectorate, the Mayor has now issued his intention to publish to the Secretary of State. The new London Plan deals with heritage issues in Chapter 7 Heritage and Culture, covering policies HC1 - HC7. The policies therein contained therein are of some, although minor, weight.

London Plan Consolidated with Amendments

- The current adopted London Plan (2016) incorporates the changes made in the Revised Early Minor Alterations to the London Plan (2013), Further Alterations to the London Plan (2014), and Minor Alterations to the London Plan (2015). The Revised Early Minor Alterations to the London Plan (REMA) set out minor alterations in relation to the London Plan and changes to UK legislation including the Localism Act (2011) and the NPPF. The revisions amend and split paragraph 7.31 supporting Policy 7.8 Heritage Assets and Archaeology with regard to developments affecting the setting of heritage assets, the need to weigh developments causing less that substantial harm on heritage assets against the public benefit and the reuse or refurbishment of heritage assets to secure sustainable development. The Glossary for the REMA also contains definitions for 'Heritage Assets' and 'Substantial Harm'. The Further Alterations to the London Plan (2014) updated policy in relation to World Heritage Sites in London and the assessment of their setting.
- 2.53 The current London Plan deals with heritage issues in Chapter 7, London's Living Spaces and Places – Historic environment and landscapes.
- 2.54 London Plan Policy 7.4 requires development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The design of buildings, streets and open spaces should provide a high-quality design response enhancing the character and function of an area.
- 2.55 London Plan Policy 7.6 notes that the architecture should "make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context".

- London Plan Policy 7.7 Location and design of tall and large buildings, states that tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations; and that tall and large buildings should not have an unacceptably harmful impact on their surroundings.
- In planning decisions, applications should include urban design justification, to demonstrate that the below criteria are met:
 - a generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport
 - b only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building
 - c relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - d individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London
 - e incorporate the highest standards of architecture and materials, including sustainable design and construction practices
 - f have ground floor activities that provide a positive relationship to the surrounding streets
 - g contribute to improving the permeability of the site and wider area, where possible
 - h incorporate publicly accessible areas on the upper floors, where appropriate
 - i make a significant contribution to local regeneration.
- 8 London Plan Policy 7.8 states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- Policy 7.8 'Heritage assets and archaeology' establishes the following clauses regarding heritage assets in London:

- Strategic: London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- 2.61 Planning Decisions: Development should identify value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- 2.62 Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

London Borough of Enfield

- 2.63 The current London Borough of Enfield Local Development Plan is formed of the Core Strategy (2010) and the Development Management Document (November 2014), as well as other supplementary documents. A new Enfield Local Plan (2018-2036) has been under consultation, further consultation is expected in early 2020.
- 2.64 With regard to Local Heritage, Townscape and Historic Environment Policies applicable to this Site, the following have been identified and are further copied in full (where applicable):

Core Strategy

- 2.65 Core Policy 30 Maintaining and improving the quality of the built and open environment is linked to DMD Policy 43 on Tall Buildings. The policy places emphasis on improving or reversing the decline of design throughout the borough and increasingly distinctiveness.
- 2.66 Core Policy 31 Built and Landscape Heritage. This policy sets out how LB Enfield intends to 'preserve and enhance' the Borough's Heritage Assets, working with national and regional partners and providing adequate justification for developments that impact heritage assets.
- 2.67 Core Policy 42 Enfield Town. This policy sets out how the Council will seek to retain the 'market town' character and protect the heritage assets, their setting and the historic environment whilst promoting development opportunities.

Development Management Document

- 2.68 DMD 37 Achieving High Quality and Designled Development. This policy highlights that development should seek to reinforce local character or/ and distinct patterns of historic development, which make a positive contribution.
- 2.69 DMD 43 Tall Buildings. This policy sets out Enfield's approach to tall building, including the acceptability in principle of tall buildings in certain locations, including near heritage assets.
- 2.70 DMD 44 Conserving and Enhancing Heritage Assets. This policy sets out that all applications affecting heritage assets or their setting (in this case the Enfield Town Conservation Area and nearby Assets

- to the Site) will require a Heritage Statement. Further, that development affecting heritage assets should conserve the asset in a manner appropriate to its significance.
- 2.71 In addition, the Enfield Town Conservation Area Character Appraisal (approved February 2015), the Enfield Town Conservation Area Management Proposal (approved February 2015) and the Enfield Local Heritage List (May 2018) are all of relevance to this Site

The policies quoted above are copied in full below:

CORE POLICY 30 Maintaining and Improving the quality of the built and open environment

- 2.72 All developments and interventions in the public realm must be high quality and design-led, having special regard to their context. They should help to deliver Core Policy 9 (Supporting Community Cohesion) by promoting attractive, safe, accessible, inclusive and sustainable neighbourhoods, connecting and supporting communities and reinforcing local distinctiveness.
- 2.73 The Council will:
- 2.74 Adopt Borough-wide standards and guidance relating to design quality, including: Maximising restoration of, access to and visibility of the blue ribbon network and the Borough's green assets; Addressing issues at the urban edge; and Reversing the decline in the loss of street greenery, architectural detailing, boundary treatments and addressing the impact of parking on front gardens.
- 2.75 Build on and extend the Enfield Characterisation Study to investigate wider urban design issues and identify:
- 2.76 Poor quality environments where improvements are needed; Opportunities for strategic design interventions that will significantly enhance people's experience of the Borough;
- 2.77 Areas of distinctive quality that warrant protection, but that do not meet the standards for conservation area designation; Areas appropriate, inappropriate and sensitive to tall buildings, including consideration of the strategic growth areas located in the Upper Lee Valley Opportunity Area. These areas will be

mapped and policies will be developed as part of the Development Management DPD; Important strategic and local views; and Opportunities for enhancing local distinctiveness, including that of the historic settlements which make up the Borough.

CORE POLICY 31 Built and Landscape Heritage

The Council will implement national and regional policies and work with partners (including land owners, agencies, public organisations and the community) to pro-actively preserve and enhance all of the Borough's heritage assets. Actions will include: Reviewing heritage designations and their boundaries where appropriate, and continuing to maintain non-statutory, local lists and designations based on formally adopted criteria; Ensuring that built development and interventions in the public realm that impact on heritage assets have regard to their special character and are based on an understanding of their context. Proposals within or affecting the setting of heritage assets will be required to include a thorough site analysis and character appraisal which explicitly demonstrates how the proposal will respect and enhance the asset; Identifying opportunities for the repair and restoration of heritage assets and working with owners of heritage assets on English Heritage's Heritage at Risk Register to find viable solutions to secure the asset's long-term future. Where necessary, the Council will make full use of its legislative powers to ensure their preservation; Ensuring developments in areas of archaeological importance take into account the potential for new finds by requiring consultation with English Heritage and on-site investigations, including the appropriate recording and dissemination of archaeological evidence; Supporting appropriate initiatives which increase access to historic assets, provide learning opportunities and maximise their potential as heritage attractions, particularly at Forty Hall and the Area of Special Character in the north west of the Borough; and Finding new ways to record and recognise Enfield's intangible heritage resources and, where possible, open up wider public access to them.

CORE POLICY 42 Enfield Town

The Council will seek to retain Enfield Town's market town character and protect its heritage assets, their setting and the historic environment, whilst maximising development opportunities to enhance

the retail function of the centre to better serve the retail and community needs of the Borough and beyond. The town centre has the potential to accommodate 500 new homes (see Core Policy 2) and meet a proportion of the Borough's projected retail growth (see Core Policy 18). The main focus for growth and new development in the town will be around Enfield Town station (see Core Policy 43 for Enfield Town Station below), with some additional development at key strategic points in the town in order to maintain vitality. These include at the former Rialto/Gala Bingo site, which will reinforce the historic focus of activity around Market Square and Church Street, and new leisure and civic uses around Little Park Gardens, which will create a new attraction in the west of the town and help to add vibrancy to the western end of Church Street. The town will continue to play a commercial role in the Borough - as such the loss of office uses will be resisted and new fit-for-purpose office uses within new development promoted. The Council supports the promotion of the town centre as a more attractive evening destination, with higher quality uses such as restaurants, bars and pubs and commercial leisure uses such as health and fitness will be encouraged. There will be a focus on the growth of jobs in the hospitality and retail sectors (see Core Policy 13 on Promoting Economic Prosperity). Enfield Town will continue to provide high quality social and community facilities, supporting existing and new populations in Enfield Town, as well as residents elsewhere in the Borough in line with its role as a Major Centre. The Council will work with the Primary Care Trust to accommodate a new Neighbourhood Centre health facility serving 50,000 patients in Enfield Town (see Core Policy 7). The town's successful schools will continue to provide the highest quality of education to Enfield's young people, with plans for improvements supported taking into consideration the inherent physical constraints of the town. Access to the high quality open spaces surrounding the town, such as Town Park, Library Green and Chase Side, will be improved. An Area Partnership will be bought forward to ensure the widest success

DMD 37 Achieving High Quality and Design-Led Development

1) Development that is not suitable for its intended function, that is inappropriate to its context, or which fails to have appropriate regard to its surroundings, will be refused. 2) Development should capitalise on the opportunities available for improving an area in accordance with the following objectives of urban design: Character: Locally distinctive or historic patterns of development, landscape and culture that make a positive contribution to quality of life and a place's identity should be reinforced; Continuity and Enclosure: Public and private spaces and buildings are clearly distinguished, safe and secure; Quality of the Public Realm: Safe, attractive, uncluttered and effective spaces and routes should be provided; Ease of Movement: Development should be inclusive, easy for all to get to and move around, connect well with other places, put people before private vehicles and integrate land uses with sustainable modes of transport; Legibility: Development should be easy to understand with recognisable and intuitive routes, intersections and landmarks; Adaptability and Durability: Development should be durable and flexible enough to respond to economic, social, environmental and technological change. Its design and materials should ensure long term resilience and minimise ongoing maintenance; Diversity: Where appropriate, development should provide variety and choice through the provision of a mix of compatible uses that work together to create viable places that respond to local needs. 3) All development should create safe and secure places and comply with the principles of Secured by Design

DMD 43 Tall Buildings

Tall Buildings

1. Tall buildings will not be acceptable in areas classified as inappropriate.

Areas inappropriate for tall buildings include those:

a. within and adjacent to the Green Belt;

b. within the boundary or in the immediate vicinity of, or along views to, or from:

- · Conservation areas;
- Nationally or locally listed buildings;
- Scheduled or locally listed ancient monuments;
- Nationally or locally registered historic parks and gardens.

2. There will be a presumption against tall buildings in sensitive areas, with the onus being on the developer to demonstrate how the proposal avoids the negative impacts associated with the sensitive classification.

Areas likely to be sensitive to tall buildings include:

- a. Locations where development would infringe upon or detract from important local views;
- b. Ridges or other areas of high ground where they would have a significant impact on the horizon;
- c. Locations where existing development is of good quality, and is relatively homogeneous in scale, grain and height, contributing to a strong sense of place (including the areas described as Residential Perimeter

Blocks in the Enfield Characterisation Study, 2011).

- 3. Applications for tall buildings in areas meeting the appropriate criteria may be acceptable in principle. The actual suitability of a proposal will always depend on the context of the site and details of the proposed building. Locations that may be appropriate for tall buildings are areas outside of those described above and which:
- a. Have good access to public transport, and/or,
- b. Contain existing and appropriate clusters of tall buildings, and/or;
- c. Are within designated town centres, activity hubs or regeneration areas. In the majority of cases more than one or all of the above criteria will need to be met, depending on the proposal.
- 4. Further and more detailed urban design analysis will need to be undertaken in all cases to examine the suitability of individual sites. In addition to the requirements set out in policy 7.7 of the London Plan (2011), proposals will only be permitted if all of the following criteria are met. Development must:
- a. Provide a landmark signifying a civic function or location/area of importance and interest and/or add to the legibility of the area;
- b. Provide adequate amenity space for all residential units;

- c. Not have a negative impact on existing important and highly visible structures (including other tall buildings);
- d. Take account of the cumulative impact of tall buildings (including consideration of extant permissions);
- e. Exhibit high standards of sustainable design and construction and architectural quality, the latter to include consideration of scale, form, massing, proportion and silhouette, facing materials, night-time appearance and relationship to other structures with particular attention to the design of the base and top of the building:
- f. Contribute to the physical and visual permeability of the site and wider area, aiding legibility and movement:
- g. Contribute positively to the public realm through the relationship to the surrounding environment and, where appropriate, through the provision of high quality public space;
- h. Not harm the amenity of properties in the vicinity through shadowing and overlooking.
- 5. There are a number of existing tall buildings that are inappropriate to their context. Any proposal for redevelopment of these sites must result in a significant reduction in the negative impact on the surrounding area and a net improvement to the quality of the development. Proposals for replacement tall buildings should seek to comply with the criteria set out in part 4 of this policy. A reduction in height must be achieved for any replacement buildings located in inappropriate locations.
- 6. The requirements of Policy 7.7 of the London Plan (2011) and those detailed in part 4 of this policy should be explicitly addressed in the applicant's Design and Access Statement, which should include
- a detailed urban design analysis of the proposal showing how it responds to, and impacts upon, its context. Applicants will be required to submit accurate visual representations of the proposal as seen from the surrounding area, including from agreed points within important local views. Visual representations will need to accurately display the appearance of the building in a number of conditions (e.g. daytime, night time

and in different seasons and atmospheric conditions). Visual representations should be prepared in line with the advice given in part 3 and Appendix C of the London View Management Framework SPG (Mayor of London, 2012).

This policy should be read in conjunction with Core Strategy policy 30

DMD 44 Conserving and Enhancing Heritage Assets

1. Applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused. 2. The design, materials and detailing of development affecting heritage assets or their setting should conserve the asset in a manner appropriate to its significance. 3. All applications affecting heritage assets or their setting should include a Heritage Statement. The applicant will also be required to record and disseminate detailed information about the asset gained from desk-based and on-site investigations. Information should be provided to the Local Planning Authority, Historic Environment Record and English Heritage. In some circumstances, a Written Scheme of Investigation will be required.

Relevant Guidance

Guidelines for Landscape and Visual Impact Assessment (2013)

- The Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA), published in April 2013, provides guidance on identifying and assessing the significance of, and the effects of, change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity. It builds upon and replaces two previous editions of these guidelines, published in 1995 and 2002 respectively. Whilst the guidance is better suited to assess landscape, the principles also broadly apply to townscape and provide a general guide to the method used for townscape and visual impact assessment. The GLVIA defines 'townscape' as "areas where the built environment is dominant". It further notes that: "townscape means the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces. There are important relationships with the historic dimensions of landscape and townscape, since evidence of the way that villages, towns and cities change and develop over time contributes to their current form and character."
- The GLVIA sets out fundamental principles and provides guidance on methods, procedures and technical issues in relation to TVIA. The guidance outlines that TVIA can be carried out either as part of a broader EIA, or as a standalone 'appraisal' of the likely landscape and visual effects of a proposed development. It explains that the overall principles and the core steps in the process are the same, and include: "specifying the nature of the proposed change or development; describing the existing landscape and the views and visual amenity in the area that may be affected; predicting the effects, although not likely their significance; and considering how those effects might be mitigated." The publication provides guidance on 'establishing the baseline', noting that the methods for baseline studies should be appropriate to the context in which the development proposal will be introduced. With regard to urban contexts, GLVIA provides guidance on the production of Townscape Character Assessments. It states that: "The nature of townscape requires

particular understanding of a range of different factors that together distinguish different parts of towns and cities, including:

- The context or setting of the urban area and its relationship to the wider landscape;
- The topography and its relationship to urban form;
- The grain of the built form and its relationship to historic patterns, for example of burgage plots;
- The layout and scale of the buildings, density of development and building types, including architectural qualities, period and materials;
- The patterns of land use, both past and present;
- The contribution of the landscape to water bodies, water courses and other water features;
- The types of open space and the character and qualities of the public realm;
- Access and connectivity, including streets and footways/pavements."
- 2.80 Chapter 6 of GLVIA describes the general approach and processes that apply when assessing visual effects. It states that: "An assessment of visual effects deals with the effects of change and development on the views available to people and their visual amenity." Chapter 6 outlines and offers advice on the process of the assessment of visual effects which involves: establishing the visual baseline—including mapping visibility, receptors of visual effects, and viewpoints and views; predicting and describing visual effects; assessing the significance of visual effects including evaluating the sensitivity of visual receptors and the magnitude of the visual effects; and judging the overall significance of visual effects.

The Setting of Heritage Assets - Historic England Advice Note 3 (2015)

2.81 The purpose of this Good Practice Advice note is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).

Historic England Guidance Note 4: Tall Buildings, consultation draft (2020)

- 2.82 This Historic England Advice Note updates previous advice produced in 2015, based on the English Heritage and CABE guidance from 2007. It seeks to guide people involved in planning for and designing tall buildings so that these may be delivered sustainably through the development plan and development management processes.
- 2.83 Tall Buildings and the Development Plan
- In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of policies in the development plan.
- 2.85 Tall buildings policies may form part of a wider urban design framework. A successful urban design framework will identify the various roles and characters of different areas, including their heritage interest, and thereby enable the conservation of heritage. An urban design framework can:
 - a) Identify those elements that create local character and other important features and constraints, including:
 - Natural topography
 - · Urban grain
 - Significant views of skylines
 - Scale and height
 - Streetscape and character assessment (including the history of the place which draws out the characteristics that are particularly significant to its identity)
 - Materials
 - Landmark and historic buildings and areas and their settings, including backdrops, and important local views

- b) Identify opportunities where prominent or tall buildings might be appropriate, for example by enhancing overall townscape legibility by drawing attention to important urban or transport nodes.
- c) Identify sites where the removal of past mistakes might also achieve an enhancement.
- In areas where significant regeneration is planned, a master-planning process can provide a more detailed urban design framework based on an assessment of options, reconciling various interests and providing clarity. While larger regeneration schemes are likely to have a major impact on their surrounding context, this still needs to be sympathetic to local character and history. Understanding the heritage significance of the area and its surroundings are an important step to take before establishing the overall aspirations of the area, as imposing precise targets on an area before considering its sensitivities can lead to unrealistic expectations.
- Modelling various heights and forms of development to assess their impact on heritage assets and the historic character of places that might be affected (including those beyond the plan boundary) at the plan-making stage can help identify the most appropriate approach to use land most efficiently. In many urban locations the use of 3D digital models can support this process by providing easily understandable images that illustrate likely impacts. Developed by planning authorities, universities, as proprietary software, or architects considering the context for their designs, 3D models are increasingly available for towns and cities across England. Such models are particularly efficient if the user can turn on different layers of data, such as heritage designations or views, and allow scenarios to be built and tested. 3D models can also facilitate the appreciation of dynamic experiences (using walkthrough video montages), and allow for the consideration of other environmental effects such as wind, daylight/sunlight or pollution.

Section 3

Historic Development of the Site and Surroundings.

3 | Historic Development of the Site and Surroundings

Enfield & Brimsdown

Early History

- 3.1 The earliest history of Enfield is of a clearing in woodland, from where the place gets its name. It is one of the oldest settlements in the wider North London area. Some of the woodland had already been enclosed as a park in the 11th century, later becoming known as Old Park. Other parts of the woodland became part of Enfield Chase in 1136, a hunting ground to the west of Enfield to which local people retained common rights. Enfield Chase was part of a larger forest which stretched from the City of London northwards for around 12 miles.
- 3.2 By the 14th century a market charter had been granted to Enfield Town. During the 16th century part of Enfield Chase, known as Little Park, became a popular location for royal hunting from Henry VIII's palace at Elsyng (now the location of Forty Hall).
- In the early 17th century, Enfield was changed by the building of the 'New River'. The New River company was established in 1606 and building began in 1609 taking only four years to complete the stretch of 38 miles from Amwell Springs in Hertfordshire to Islington, in order to deliver clean water to London's growing population. The Enfield 'loop' diverted off the main route but was later cut off to provide a more direct supply, with the New River at Enfield becoming a decorative rather than a functional waterway.
- 3.4 In the mid-17th century the total area of Enfield Chase was estimated at 7,904 acres, with the eastern boundary of the Chase ran from the western edge of Old Park up to the line of Gentleman's Row and Chase Side. It was also at this time that Enfield Town began to establish its current layout of roads, with the marketplace created around 1632.
- 3.5 Gentleman's Row became established as a lane with brick-built townhouses in the mid-eighteenth century. In 1777, an Act of Parliament allowed for the enclosure of Enfield Chase, the parish was further enclosed in 1803, with Chase Green retained as open common land.



Figure 3.1 County of Middlesex, John Roque, 1757



Figure 3.3 OS Mapping, 1896



Figure 3.2 OS Mapping, 1914 OS Mapping, 1866



Figure 3.4 OS Mapping, 1914

3 | Historic Development of the Site and Surroundings

19th, 20th and 21st Century

- 3.13 The 19th century saw further building expansion in Enfield, particularly following the arrival of the Railway, first at Enfield Town in 1849 and then the terminus of the Great Northern Railway branch line from Alexandra Palace and into Kings Cross, on Windmill Hill in 1871. The railways shaped Enfield into a medium sized town, with a number of later 19th and early 20th century civic and commercial buildings, reflecting its increasing population of new resident London commuters.
- 3.14 Within this development of Enfield, Brimsdown formed as an eastern neighbourhood on the west side of Lea Valley and is bounded by the eastern Lea Valley line.
- Brimsdown station, on the G.E.R. main line, was opened in 1884. There was a scattering of new houses in Green Street and the newly-laid-out Brimsdown Avenue, Osborne Road, and Mayfield Road by 1897, (fn. 100) although the roads were not completely built up until after the First World War.

The Site

- 3.6 OS mapping from 1866 shows that the Site and surrounding area was generally agricultural land, with the Lea Valley trainline running through it and some farm buildings. By 1896 Brimsdown Station was built and some clusters of terrace housing began to be developed to the east along Brimsdown Avenue and Osborne Road in addition to a nursery. To the east of the Station more industrial uses were beginning to be developed, including Imperial Lamp Works. This continued to expand into the early 20th century.
- 3.7 By 1937 there was a significant amount of development in the area, including semi detached housing wrapping along Green Street. The Site itself had not yet been developed on, however, appears to be in ownership of British Ideal Works. At this time, to the east of the Site were a group of large scale industrial buildings which were owned by British Ideal Works and Paragon Works (Toy & Letter Sign Writers). There is a clear division between the suburban development to the north or Green Street and the large scale industrial to the south. To the east of the railway industrial building were also continuing to develop.



Figure 3.7 The LNER line at the Brimsdown industrial estate and environs, Brimsdown, 1947



Figure 3.5 OS Mapping, 1936

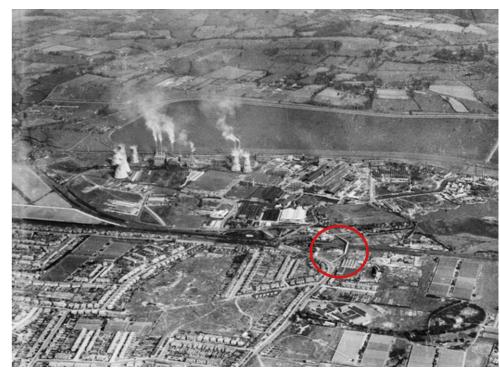


Figure 3.8 Brimsdown Industrial Estate, King George's Reservoir and environs, Brimsdown, from the west,



Figure 3.6 OS Mapping, 1966

3 | Historic Development of the Site and Surroundings

- 3.8 Between 1937 and 1939 residential development of Brimsdown continued-mainly made up of clusters of terrace housing- and an open pit was developed on the Site as part of the British Ideal Works. To the east of the railway tracks industrial uses were also expanding. The 1967 image of Brimsdown shows the substantial and large structures of the Brimsdown Power Station, but was decommissioned in 1976 and have since been demolished.
- OS mapping from 1966 shows that the Site was then divided boarded by a foot path to the south which led from Green Street over the railway tracks to Jute Lane. At this time the southern portion of the Site was still occupied by the open mine, though it is likely that the British Ideal works no longer occupied the Site. The northern portion of the Site consisted on a large scale rectangular warehouse building. Planning records show in that 1948 planning permission was granted for a single storey factory building which is likely to be this. The south of the Site was allotment gardens were developed and to the west the Paragon Works industrial buildings had significantly expanded to almost double the size.
- 3.10 During the mid to late 20th century, the Site and surrounding area developed along the same pattern: suburban residential development to the north west, mixed industrial and residential development to the south west and large-scale industrial to east. The industrial development around this area has not changed much over time as the image of the signal train crossing from the 1970s indicates.
- 3.11 By 1985 the open pit had been removed and left a vacant space on the southern portion of the Site. This remained until between 1990 and 1992 a small, garage building was constructed and behind the existing industrial building to the north of the Site two smaller buildings were constructed along the eastern border.
- 3.12 Sometime between 1995 and 2003 the small garage building on the southern portion of the Site was demolished and an additional large scale warehouse building was constructed, adjoining the existing large scale building by a narrow corridor. There is no record available on the Council's Planning Register to confirm the redevelopment of the site during this time. However, following survey of the buildings and supported by the change in footprint on historic map regression, it is likely that the existing warehouse buildings were built during this time.

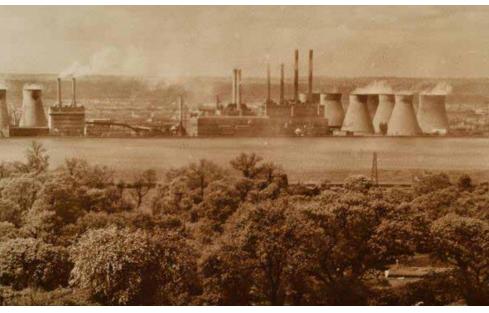


Figure 3.9 Brimsdown Power Station, 1967



Figure 3.10 Brimsdown Station signal crossing, 1970



Figure 3.11 OS Mapping, 2003

Section 4

Site Description and Identification of Assets.

4 | Site Description and Identification of Assets

The Site

- Located at the junction of Green Street and Enstone Road, the site is accessed off both routes by two individual gateways. The site is bounded by these routes to the west; Builder's Yard and 245 Green Street to the north; Brimsdown Station and railway tracks to the east; and Anemone Court to the south. to the west of the site is a bus lay-by which is accessed off Green Street.
- 4.2 241 Green Street consists of a pair of utilitarian warehouse and office buildings which stand at around two storeys, just south of Brimsdown Station, which provides trains direct to Liverpool Street Station, London. The building to the north is masonry and render with a flat roof and the building to the south is of corrugated steel and pitch roofed. There is no landscaping on the site and the boundary treatment is of partly red brick but mostly steel fencing.
- 4.3 Currently the site is unoccupied but was most recently operated by Ripmax, the signage on the north building remains, producing radio control model distributors.



Figure 4.1 The site along Green Street



Figure 4.3 Approaching the site along Enstone Road



Figure 4.2 Western elevations of both existing buildings and hard standing



Figure 4.4 The existing buildings from Platform 1 at Brimsdown Station

4 | Site Description & Identification of Assets



Figure 4.5 Heritage assets map, indicating the listed buildings and locally listed assets considered for assessment. The site is indicated in red.

Heritage Assets

- There are no immediate heritage assets located next to the site but there are a low number of heritage assets within the wider vicinity of the site. Those identified are considered for assessment in terms of the potential change to their setting owing to the proposed increase in massing. These are as follows and numbered on the above map:
 - 1. The White Horse Public House (Grade-II listed)
 - 2. 98 & 100, Green Street (Grade-II listed)
 - 3. Collection of buildings associated with King George's Pumping Station (Grade-II listed), including:
 - Weir with inlet pipes at King George Pumping Station
 - · Water town house at King George Pumping Station
 - Pump House King George Pumping Station
 - Retort House & King George Pumping Station
 - 4. Durants Park (Locally listed)



Figure 4.6 The White Horse Public House



Figure 4.7 98 & 100, Green Street

The White Horse Public House, 116 Green Street

List Entry Number: 1079538

Grade-II listed

- A.5 Today the White Horse Public House is known as Rafaella Court and has been converted to residential use. The former public house is a large timber framed building of 17th century or earlier and has been considerably altered over time. The building is of 2 storeys and dormered attic with 6 window bays. The high pitched hipped tiled roof has 3 gabled dormers. The external framing is exposed with plaster filling in the 1st floor centre with tile hung sides. The ground floor is rendered with modern plaster. The casement windows are mostly of 19th century and modern additions but one or 2 older ones remain. Two modern porches have been added on ground floor.
- The setting of the designated heritage asset has changed from the former historic rural landscape as the area has been developed. The former public house is experienced within the suburban residential development that surrounds it and the main access from Green Street with hard standing parking.

98-100 Green Street

Grade-II listed

List Entry Number: 1358707

- originally built as a single dwelling in the 17th century of timber frame structure is now 2 dwellings. The buildings are 2 storeys with 3 window bays s in all. The buildings have been re-roofed in machine tile and has a large ridge stack, now rough rendered. No 98 has roughcast at 1st floor and incised stuccoed on ground floor. No 100 is weather- boarded and painted white. The windows are modern casements, as well as the doors. Roof sweeps low behind. Inside, No 98 has some exposed beams and No 100 has 2 original doors of 6 equal-sized panels with heavy raised borders. These buildings have been graded somewhat for rarity value in this area in spite of alterations; and many of these are reversible.
- 4.8 The setting of the designated heritage assets has changed from the former historic rural landscape, which this dwelling would have been associated with as a likely farmstead, as the area has been developed. These dwellings are experienced within the suburban residential development that surrounds them.

4 | Site Description & Identification of Assets



Figure 4.8 King George V Pumping Station

- by narrow revealed bays with glazing-bar windows, set in rusticated stone semi-circular arched architrave above and square-headed architrave below.
- 4.10 The pumps, the invention of H A Humphrey, dispensed with the usual pistons, flywheels etc, and were provided with their momentum by the free movement or oscillation of water between pump and tower: they are the first example of their type in the world.
- The setting of the pumping station is made up of the William Girling Reservoir, grounds of the pumping station and associated structures.



Figure 4.9 Durants Park

- by green corrugated sheets but parts of the original structure are still visible. Had been used as office by the previous tenant of the Timber Yard.
- of estate land for a public park. The park remains open to the public and is used, although not always in high activity, by locals for recreation and sports activities.
- 4.14 The setting of this heritage asset is mostly made up of the surrounding residential development, which is varied in scale from lower lying estate housing to Higher tall buildings of the post-war era.

King George V Pumping Station

Grade-II listed

List Entry Number: 1079456

Opened in 1913, King George V Pumping Station was designed by William Booth Bryan for Metropolitan Water Board. The pumping station is constructed of English bond red brick with limestone dressings, set on blue brick plinth; hipped Welsh slate roof and is Edwardian Baroque style. The corner turrets have moulded stone cornices and diamond latticed windows with a stone cill band beneath the turret windows and continued as moulded stone string course beneath parapets of main elevations. The 9-bay side elevations have tall windows with glazing bars set in semi-circular arched architraves with moulded stone edge to each arch set on moulded imposts and divided by rusticated brick pilasters and cast-iron casements with glazing bars set in plinth beneath. Wide raised pilasters flank the narrow entrance bay which has a bracketed hipped gablet and diamond-latticed lights set above tall semicircular architrave with glazing bars to window set in rusticated stone surround above panelled door. There is a glazed clerestorey lights incorporated within the roof. The 3-bay end elevations have similar entrance bays with panelled double doors, flanked

Durants Park

Locally Listed

4.12 Durants Park is named after Durants, one of the eight submanors of the Enfield Estate, which date from the 13th century when William the Conqueror granted Enfield to Geoffrey de Mandeville. It was allegedly named after the family of an Adam Durant recorded here from 1244. In the early C15th the Durants estate was owned by the Wroth family who held land in Middlesex for a number of centuries, Sir Thomas Wroth and his son Sir Robert Wroth both holding important positions in Elizabethan times. James I was reputedly a frequent visitor. It was later owned by Sir Thomas Stringer, whose wife Lady Stringer lived here until 1727 and is buried at St Andrew's Church. Their son, William, married a daughter of the infamous Judge Jeffreys who was known to have visited Durants and fortifications could be seen on an outbuilding, reputedly erected for his protection. In 1910 this and the remains of the moated manor house, Durants Arbour, were demolished. The site of the moated manor house was south of the public park to the east of Ponders End High Street but The last parts of the manor house were demolished early 20th century and a housing estate now covers the area. Parts of Durants Arbour may have been incorporated into Kingswood Clay Hill. The lodge is now faced

Section 5 Assessment of Significance.

5 | Assessment of Significance

- The assessment methodology used here for assessing the significance of the identified heritage assets and their settings is as set out in Annex 2 of the National Planning Policy Framework. This proposes the use of three heritage interests historical, archaeological, and architectural and artistic in assessing what makes a place and its wider context special. The definitions for these interests are included in the online Planning Practice Guidance:
 - Archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
 - Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.
- These interests are also used in the November 2017 consultation draft of Historic England's best-practice guidance document Conservation Principles.

 They replace the heritage values evidential [now archaeological], historical, aesthetic [now architectural and artistic], and communal [now part of historical] set out in the previous, 2008 version.

The Site

- 5.3 The buildings located on the site are of modern construction and replaced former warehouse buildings and pit dating from the 1940s. Prior to this there was no development of the site and there have been no findings associating the site to the neighbouring historic estate of Durants, although potentially once fell within the lands of this. There is no remaining evidence of previous uses on the site and therefore is considered to be of no archaeological or historic interest.
- The existing buildings are clearly of no architectural or artistic interest and are also associated with a large quantity of poor-quality hard standing. The buildings are utilitarian in appearance and built with a low quality of materials. Over time and while the buildings have not been used there seems to have been deterioration, especially damage to fenestration.
- 5.5 Furthermore, owing to the poor quality buildings and industrial use that is at odds with the local residential area, the Site is considered to be a negative feature along Green Street.
- 5.6 Considering the lack of interest found in the site, it is judged to be of no heritage value.

Significance of Listed and Locally Listed Heritage Assets

The White Horse Public House, 116 Green Street

Grade II Listed

- The White Horse Public House is located on the western end of Green Street. The significance of former public house derives from its association to the early development of the town. The building is also a well kept example of a timber framed 17th century building. Its significance has been weakened by its later alterations and change of use.
- 5.8 Owing to the significant distance and bend in the road there is no current intervisibility between the Public House and the Site. The site is not experienced as part of the setting of this designated heritage asset and therefore does not contribute to the significance of the White Horse Public House.

98-100 Green Street

Grade II Listed

- The buildings at 98-100 Green Street are also located along the western end of Green Street. The significance of these residential buildings is derived from their historic value as a pair of the earliest buildings within the area, and are indicative of Brimsdown, Enfield's 17th century development which is a rarity in this area. The buildings have both undergone various alterations which weakens their aesthetic value.
- 5.10 Due to the significant distance and turn in the road at the eastern end of Green Street, there is currently no visibility between the Site and the asset therefore, it is clear that the Site does not form part of the setting and therefore makes no contribution to the significance of 98-100 Green Street.

King George V Pumping Station

Collection of buildings associated with King George's Pumping Station (Grade-II listed), including:

Weir with inlet pipes at King George Pumping Station

Water town house at King George Pumping Station

Pump House King George Pumping Station

Retort House & King George Pumping Station

Grade II Listed

- The significance of this Grade II Listed Pumping Station and associated assets is for its historical value as a symbol of Enfield's Edwardian industrial past. The pumps themselves were the first example of their type in the world. The building also has architectural value for its high quality and well kept Edwardian Baroque style. In addition, though the building is not in full service three gas and two electric pumps are still in use.
- 5.12 The Pumping Station is located approximately 1.5km from the Site, therefore owing to the distance, flat topography of the area and intercepting built form, there is clearly no intervisibility between the Site and this designated heritage asset.

Durants Park

Locally Listed

- 5.13 The primary significance of Durants Park is due to its historical importance to the town. It has historical connections to the early development of Enfield in the 13th century as the public park once formed part of Durants Estate, sub-manor of the Enfield Estate of which James I was a frequent visitor. All the structures and have since been demolished, including moated Manor House and from 1903 the grounds have become owned by Enfield UDC. The plain design of park itself has limited aesthetic interest.
- This asset is relatively close to the Site, located to the south-west and in its more modern form as a public open park. This local amenity is experienced quite separately from the Site and vice versa. The site is currently not visible or forms part of Durants Park and is therefore not considered to contribute to the significance of this non-designated heritage asset. The Site does not contribute to the historic significance of the asset.

Section 6

Townscape Character and Assesment.

6 | Townscape Character and Assessment

- The Site is located within the London Borough of Enfield. The development of the Site and surrounding area has largely been influenced by the industrial and manufacturing development of the town, led by its proximity of water, rail and power. This has driven the town to develop a varied townscape which is split along the eastern and western sides of the railway, between industrial land, suburban residential areas and open spaces.
- The Brimsdown locality was primarily an agricultural, rural context until the end of the Second World War. At the point, the land east of the railway became used for industrial purposes, developed mostly in the 1960s and 1970s.
- Today, the existing heights of buildings within Brimsdown are fairly low scale, between two and three storeys, with only some modern high rise apartment buildings punctuating the skyline, including the thirteen storey buildings along Exeter Road
- Despite clear differing typologies of buildings within Brimsdown, within the character areas depicted below, there is generally limited variation. There is a general impression of uncoordinated urban sprawl and piecemeal development, rather than a rationalised expansion of the town with some areas of focused activity.
- The green spaces around of Brimsdown are largely made up of large open spaces with not many smaller pocket parks between, with only some street being tree lined streets. In addition to wide roads and paved front gardens, this means that the townscape is feels relatively harsh with little interruption of vegetation to break up the unchanging landscape.



Figure 6.1 Aerial map showing the character areas identified

- 6.6 The list of 5 character areas as identified on the accompanying map:
 - 1. Mixed Residential
 - 2. Industrial
 - 3. Brimsdown Station
 - 4. Post-war Residential
 - 5. Open Space

6 Townscape Character and Assessment

1. Mixed Residential

This Character Area is defined by mostly low scale post war housing which generally have a varied character due to the incremental nature of development of the area, though is largely made up of suburban, two storey semi-detached houses which initially developed as linear developments along main arterial roads like Green Street. The built environment is broken up by tree lined streets and, though most front gardens have been paved, the incidental elements of foliage within some of these tree lined streets



Figure 6.2 Green Street, junction with Brimsdown Avenue, looking west

2. Industrial

3. Brimsdown Station

This character is bounded by Brimsdown Railway line and the River Lee. The area is defined by low scale warehouse buildings which are accessed via a network of wide, harsh roads which lack any foliage. Buildings are broken up by large areas of paved open spaces and car parking. There is a lack of any green space with only some trees lining the road, acting as a buffer to this industrial zone.



Figure 6.3 Jute Lane, east of Brimsdown Station

The area is defined by Brimsdown Station which is at the centre and is transition zone which lacks a comprehensive identity. It has a mixed character which lacks cohesion, with no obvious direction that this is a station. Overall, it is of low townscape character and lacking in vitality and wayfinding on approach.

This character area contains a significant proportion of Brimsdown's small scale commercial buildings which are standard red brick two storey buildings. These are simple and of poor quality which fail to add much sense of place.

The Site sits within this character area.

4. Post-war Residential

5. Open Space

the area.

6.10 This character area has a significantly higher densification of housing which forms an anomaly among the surrounding area, yet it remains relevant to its overall character. The most imposing buildings within this character area is a cluster of tower blocks that rise to thirteen storeys which boarder Durants Park to the south and currently dominate the skyline amongst the lower scale surrounding development.



Figure 6.4 Post-war residential development at Exeter Road



Figure 6.6 Brimsdown Avenue, looking south

6.11 This character area is made up of informal open green space. There is little landscaping a formalised space outside of some footpaths which allow routes through. These open spaces provide some relief to the surrounding spread of estate development. Durants Parks makes up a large area of the available open space and is highly used by residents for

amenity and more pleasant pedestrian routes through



Figure 6.5 Durants Park from along Green Street

Section 7 Assessment of Impact.

Proposed Development

- 7.1 The development proposal involves the demolition of the existing one and two storey warehouse building on the Site and the construction of a new residential led, mixed use development, designed by Matthew Lloyd Architects (MLA). The design has been the work of a series of pre application discussions between the architects, L.B. Enfield and Iceni Projects, which has led to the refinement of the design on behalf of Stonegate Homes. Full detail is outlined and provided in the Design & Access Statement produced by MLA and should be read in conjunction with this report and assessment.
- 7.2 Overall the site is proposed as 3 main blocks at staggered heights, located around a central landscaped open square. Block A to the west of the site on Green Street, and an extension to Block C, are lower in scale allowing afternoon and evening light into this public space. Blocks B & C to the east, adjacent to the railway, are taller at 14 and 16 storeys, and assist in protecting the western part of the site from the noise of the railway.
- 7.3 The ground and first floors accommodate flexible commercial space suitable for offices, community or retail uses, cycle storage, car parking, as well as service and refuse functions, and the double height entrances to the residential accommodation above, 154 mixed tenure dwellings with 50 % affordable.
- 7.4 The landscaping around the development has been thoroughly considered alongside and as part of the design development by the landscape architects, Farrer Huxley (FH). There is a full tree planting and public realm strategy outlined in detail within the Landscape Report which should also be read in conjunction with the following assessment.

Tall Buildings Assessment

The following assessment of the proposed development considers the 10 characteristics set out within the National Design Guide (2019) for the justification of a taller building at this location. These characteristics have been regarded throughout the development of the design, interrogating the design rationale and informing the overall approach of the design team as well as consultation carried out with LBE and Design Review.

Context

- 7.6 Section 3.0 sets out the historic development of Brimsdown and the Site which has developed from an agricultural past which has developed into industrial use from the late 20th century, predominantly in the 1960s and 1970s. The local area to the west of the Site has developed into suburban housing, whilst the eastern area is made up of a cluster of industrial warehouses. The Site currently consists of a pair of one and two storey industrial buildings, which are set back from the road and surrounded by poor quality hard standing and car parking.
- It is important to consider the emerging context around Brimsdown Station and other sites along the Lea Valley. Sites around the station are generally considered suitable for redevelopment and there is potential for a masterplan to be brought forward in conjunction with LBE. Future development is likely to consist of high rise and more densified tall buildings, occurring on both the eastern and western sides of the railway station. There is potential to mark the station and local centre with more prominent taller buildings that would accommodate greater densification while also benefiting the wayfinding through the area.. The proposed development would be the first of these and the design has been considered in terms of how future development would establish here. Appendix 4 sets this emerging cumulative context out in greater detail.
- 7.8 The proposed design is able to sit well within both the existing and emerging context by becoming a visual cue and towards the station and contribute with greater influence on the townscape of Brimsdown and providing a sense of arrival into the town. The buildings are set back and scale down towards the suburban development to the west, whilst the railway lines act as a buffer to the less sensitive industrial area. The potential emerging context will create a cluster of higher density development within the area surrounding the Station. The subtle materials, use of brick and simplified style of the proposed design relate well to the existing context, whilst paying regards to the industrial past of the area.
- 7.9 In addition, the building's mixed uses at ground and first floor will link effectively to the existing commercial buildings along Green Street and next to Brimsdown Station. The development will positively enhance the local centre character, introduce a greater level of activity and better connect through to the station.



Figure 7.1 Proposed Design from Green Street, May 2020 Source: Matthew Lloyd Architects

Identity

- The Site itself sits on a plot of land close to Brimsdown Station which currently lacks any special character that would set it apart as a gateway into and out from the town. The proposed development seeks to introduce a more distinctive quality to the townscape at this location.
- 7.11 The identity of the station approach of Brimsdown will be enhanced through activation of the Site at ground and first floor levels by providing flexible commercial units. Currently the buildings on the Site are set back from the street, creating a negative and hostile environment which discourages vitality. This will be improved by bringing the plot lines forward to follow the pattern of the street and create a better relationship of the Site to with wider street level.
- 7.12 As a tall building within a context of relatively small scale development, this proposed design would help to characterise the identity of this part of Brimsdown. The area around the station currently lacks interest and distinction, therefore, the well considered design of this building in this location would have a positive impact on the identity on the town.
- 7.13 The proposed materials include a variation in brickwork within blocks B and C with different colours, patterns a textures breaking up the facade with steel detailing and fascia panels. Landscaping is also an important to establish identity through rich planting, characterful play spaces and seating areas, adding vitality at street level, with a wider vision to connect up the town as a whole.

Built form

- 7.14 The built form of the proposal has been slightly reduced from first pre-application in December 2019 and now proposed up to sixteen storeys at the highest. The bulk of the massing has been more significantly scaled back to create a narrower more rectangular form of the blocks. The top floors of the taller blocks, B and C, were slimmed and the higher of the blocks switched from C to B, which alleviates some impact of the height of the built form and also ensures that optimal aspect for daylight and sunlight can be achieved.
- 7.15 The building is significantly taller than the neighbouring development of the town at present, however, the architects have produced a design

- which is cohesive with the surrounding as a transition zone and gateway into central London and appropriately stands out within its otherwise weak townscape context. The built form staggers down from sixteen to fourteen storeys along the railway tracks, the least sensitive area of the Site and two and five storeys, closest to the existing residential development at the junction of Green Street and Enstone Road. The effect of this also creates some variety in the proposed built form and successfully breaks down the overall mass to avoid overdominance within the urban environment.
- 7.16 The impact of the height of the built form on the surrounding townscape will be further mitigated by the emerging context within the town which will see an general increase of building heights along the railway lines. This will help to contextualise this new higher density character forming within the area.

Movement

- 7.17 Movement through the Site has been carefully considered with a combined architectural and landscape approach. The Site currently restricts access through and lacks permeability due to bulky course grain buildings and a non joined up approach to development in this area. The proposed design will create a 'car free courtyard' which will encourage and allow greater pedestrian movement.
- 7.18 The architecture and landscaping design create visual cues to key nodes which help orientation and legibility of the Site within its surrounding context, particularly with reference to the Station. Due to the development's proximity to the station, movement around the Site should allow this to be easily accessible.
- 7.19 Existing routes and visual links will be maintained along key walking routes and some will be designed to allow for emergency fire vehicles access.
- 7.20 The development suggests the possibility of a 'green spine', linking the Lea Valley to Brimsdown and beyond, which has been identified to run along Green Street and Millmarsh Lane to the River Lea. This would amplify the walkability, air quality and overall quality of life in the area, as well as providing secondary connections to local parks and sports clubs. Brimsdown can set a precedent for the area's wider transformation.



Figure 7.2 Proposed Design, Ground Floor landscaping strategy, May 2020
Source: Farrer Huxley

Nature

- 7.21 Farrer Huxley's landscape strategy for the scheme aim to kick start a wider enhancement of the natural environment around Brimsdown, following on from the 'Green Link' principles indicated above. Currently the Site lacks any positive natural qualities and has a low ecological value, therefore the varied and softened landscaping which is proposed will have a positive impact on this aspect of the area.
- 7.22 At ground floor level, the landscaping is designed to have a relaxing yet functional use, which will change its character through the seasons. Native and nonnative trees will form an essential part of the design of the landscape and complement and extend the existing tree cover in the area. There will be a mix of flexible hard and soft landscape spaces with a variety of 'wildlife friendly planting', biodiverse green roofs and nesting/refuge aids such as 'insect hotels', nest boxes an bat boxes.

Public Spaces

- 7.23 The spaces around the Site are currently inaccessible and poor quality. Currently there is no integration of the Site to the adjoining street. The proposed development will significantly improve the pedestrian routes with strategic connections created though from the Site to the station, whilst also becoming accessible for pedestrians traveling north along Enstone Road to the station. Within the internal courtyard, between the blocks of the development, interactive elements such as the incidental play spaces and seating will create a higher quality and inviting public realm.
- 7.24 The public spaces will be utilised for a variety of dayto-day activities within the central courtyard, including
 formal and informal play and seating areas with a mix
 of permanent and flexible furniture. In addition, the
 new public facing entrance along Green Street will
 allow greater activity along this edge and improve
 the quality of public realm on this key route within the
 town, towards the station.

Uses

7.25 Through development of the Site, its use will be converted from industrial warehouses to mixed use residential and flexible commercial spaces. The positioning of the Site, at a transition zone between suburban residential and an industrial landscape,

provides the potential to bring in a use which would exemplify this as an entrance point and transition area into Brimsdown, and add vitality to the fairly inhospitable landscape at present.

Homes and Buildings

7.26 The residential uses which make up the development have been designed to provide a mix of one to three bed homes, with a balcony or terrace for all apartments that will add character to the fairly nondescript housing within the area.

Resources

- 7.27 Service and management of the site has been considered including refuse collection which is within residential cores and treated as a 'back of house' area which avoids taking refuse through main residential areas. The loading bay for refuse vehicles is provided within kerbside loading bays to each of the refuse stores of each block. This alleviates the need for the truck to obstruct any flow on Green Street and Enstone Road.
- 7.28 The proposed development also considers the potential effects on the environment and has incorporated energy saving measures include sustainable building and water efficiency measures, waste management, recycling, the use of materials with low embodied energy and substantial on site cycle parking. Its location further enhances this due to its proximity to local public transport routes.
- 7.29 Further detail on this can be found within the D&AS and the Sustainability Statement produced by XCO2 Energy Ltd.

Lifespan

7.30 The proposed development has been considered comprehensively with the Council with a series of revisions to the design to ensure that the future redevelopment of the site will be one of a durable scheme that can encourage and facilitate the existing and future residents to enjoy an improved living and working environment. The proposed materials in the built form and public realm have been selected to ensure a high-quality scheme is achieved but also for durability as a place that will be appreciated and grow for years to come.



Figure 7.3 Proposed Design, north-west elevation along Green Street, May 2020 Source: Farrer Huxley

Assessment of Impact on Heritage Assets

The White Horse Public House (Grade-II listed)

7.31 There is no direct impact to the significance of the listed Public House. The proposed development will be experienced as a very distant element to the east of this designated heritage asset and will therefore result in no impact to the setting and therefore have no impact on the significance of this designated heritage asset through change to its setting.

98 & 100, Green Street (Grade-II listed)

7.32 There is no direct impact to the significance of the listed buildings at 98-100 Green Street. The proposed development will be experienced as a very distant element to the east of this designated heritage asset and will therefore result in no impact to the setting and therefore have no impact on the significance of this designated heritage asset through change to its setting.

George's Pumping Station (Grade-II listed), including:

- Weir with inlet pipes at King George Pumping Station
- Water town house at King George Pumping Station
- Pump House King George Pumping Station
- Retort House & King George Pumping Station
- 7.33 There is a significant distance from this grouping of listed buildings to the site, approx. 1.30km, and many intercepting built elements such as King George's Reservoir that there is no intervisibility between these elements and the Site. There would be no impact to the significance of King George V Pumping Station and associated buildings through change to their setting.

Durants Park (Locally listed)

7.34 Durants Park is a vast informal public open space within an area of varied and informal development. The proposed development would be visible within the distance to the east of the Park but mostly only from the eastern area of the Park and would be experienced as a taller high quality element within an urbanised residential area. Owing to the high quality of architecture and well considered design the proposed development is considered to be introducing a positive element to an area lacking in any distinctiveness and overall improving the townscape character setting of the non-designated heritage asset.

Assessment of Impact on Townscape Character Areas

1. Mixed Residential

7.35 This is a wide ranging character which the Site abuts to the west. The proposed development will introduce a high level of change but through the replacement of the detracting and poor quality industrial buildings will introduce enhancement to the character area. Furthermore, the introduction of residential dwellings at this location will complement the existing use better while also introducing better quality services and public realm to connect existing residential areas through to the Station.

2. Industrial

7.36 The industrial Character Area is not sensitive and is considered to be of poor townscape quality. The Site does not directly impact on this area and is severely detached from this area owing to the railway lines that bisect. The proposed development would be experienced from the Industrial Character Area within the background to the west but owing to the high quality of architecture is considered to be a positive new element around Brimsdown Station.

3. Brimsdown Station

7.37 Currently Brimsdown Station lacks any indication of its presence within the existing urban area other than the signal crossing when approaching the Station access. The proposed development would introduce a greater level of built form which would pronounce this as a major transport node which links the area south into London and northwards to Cambridge, not to mention the future plans to broaden transport links through Crossrail 2. Furthermore the proposed development would introduce the opportunity for more permeable and high quality pedestrian links to and from the Station. Overall, the proposed development would introduce much needed improvements to the Character Area and beneficial connections to the wider local area.

4. Post-war Residential

7.38 The proposed development is located too far from the post-war blocks to the south of Durants Park to have a direct impact on this Character Area but would be experienced within the wider area. The proposed development would introduce a mirrored taller context to the north of Durants Park but would sit more comfortably within the existing residential estates and introduce a much higher quality of

architecture. Overall, there is no impact on the Postwar Character Area but when experienced more widely would be one of an enhancing impact.

5. Open Space

7.39 The Open Space Character Area is a vast space and has many different boundary settings across the highly residential area and variation in form. The proposed development would be experienced as a higher element within the northern area but would be a background element indicating Brimsdown Station and is considered to be a positive contributor owing to its wayfinding and high quality architecture

Section 8 Visual Impact Assessment.

8 | Visual Impact Assessment

- by Iceni Projects Ltd and is based on the survey of the Site and the surrounding area, January 2020. The the following selection of views has been discussed and agreed with the Council, including the specification required to adequately assess the visual impacts of the proposed development and the identified locations. A total of 12 viewpoint locations have been discussed and agreed with officers at Enfield Council and are set out in the following Section.
- 8.2 Each verified view has been accurately surveyed and photographed and developed as an Accurate Visual Representation (AVR) by visualisation specialists, RockHunter. The methodology for the production of AVRs can be found at Appendix 3 of this report. For each view assessed there is an existing image the baseline context and in all cases the proposed development will be indicated within the photograph as either a:
 - Verified Wireline surveyed data is collected in order to verify the position of the view and accurately place the proposed development within the existing image, a wireline will depict the proposed development; or
 - Verified Render surveyed data is collected in order to verify the position of the view and accurately place the proposed development within the existing image, the proposed development will be depicted in full detailed render.
- Furthermore, a cumulative study has been developed to investigate the potential cumulative context relating to the expected future masterplan development around Brimsdown Station, found at Appendix 4 of this report.



Figure 8.1 Aerial map showing the 9 close range preliminary viewpoints for assessment, the site is outlined in red.

- The complete list of the 12 agreed viewpoint locations and suggested specification, if these views are to be developed as fully rendered, are as follows:
 - View 1 Mollison Avenue (wireline)
 - View 2 South of McDonalds on Green Street (wireline)
 - View 3 Brimsdown Station Platform 1 (wireline)
 - View 4 Junction of Green Street & Brimsdown Avenue (render)
 - View 5 Brimsdown Avenue, intersection with Osborne Road (wireline)
 - View 6 Green Street intersection with Hunts Mead (wireline)
 - View 7 Brimsdown Primary School (render)
 - View 8 Enstone Road (render)
 - View 9 Braithwaite Road connecting to roundabout (wireline)
 - View 10 Lee Valley Bridge Road bridge over railway (wireline)
 - View 11 Alma Road (wireline)
 - View 12 Durants Park (wireline)



Figure 8.2 Aerial map showing the 3 long range preliminary viewpoints for assessment, the site is outlined in red.

8 | Visual Impact Assessment

View 1 - Mollison Avenue





Existing

Proposed

Existing

Walking south along the major motor route of Mollison Avenue (A1055) towards Brimsdown, there is not much built form to indicate the town centre. McDonalds restaurant and drive-through stands out against the hardened industrial environment along here. The pedestrian pavements are fully segregated from the heavy traffic routes by lengths of guard rails, which combined is experienced as quite a hostile and unwelcoming route to walk along. This is an area dominated by the cars routes rather than drawing any awareness to the location of Brimsdown Station here.

Proposed

The proposed development is indicated in an orange wireline and would appear within the background beyond the McDonalds 'golden arches' signage. The stepped form and profile would be appreciated from this location and establish a greater level of built form through the introduction of a higher and varied building.

Effect

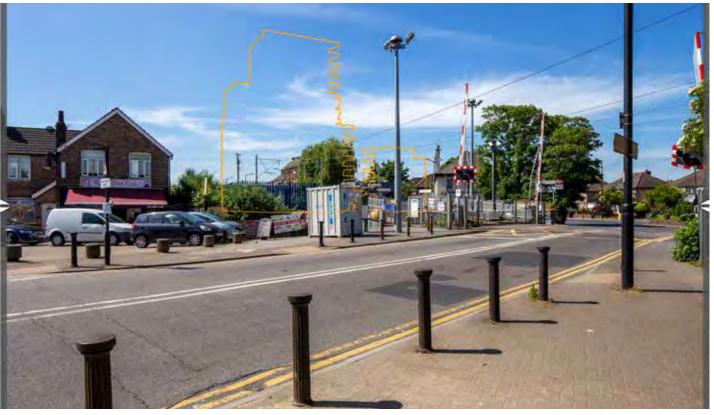
Although there would be change introduced through redevelopment of the Site this is considered to be contextual to the urban centre it would sit within. This is an area lacking in character and quality of a place that is lived in and used by the local community. The proposed development would introduce a much higher quality of residential development and introduce a level of densification warranted by the local centre and transport hub location, resulting in an enhancement of the built environment.





View 2 - South of McDonalds on Green Street





Existing

Proposed

Existing

This is an important junction in Brimsdown, where the Train Station is accessed and routes allow bridging across the railway lines. Signage at this point indicates the Station access but is not overly obvious that this is Brimdown Station. The crossing is signalled so will frequently cause some backup of cars until the train has passed through. Royal Star Cafe 2 to the left of this view serves commuters and residents before they embark their journey but otherwise there is limited neighbourhood activity evident at this location.

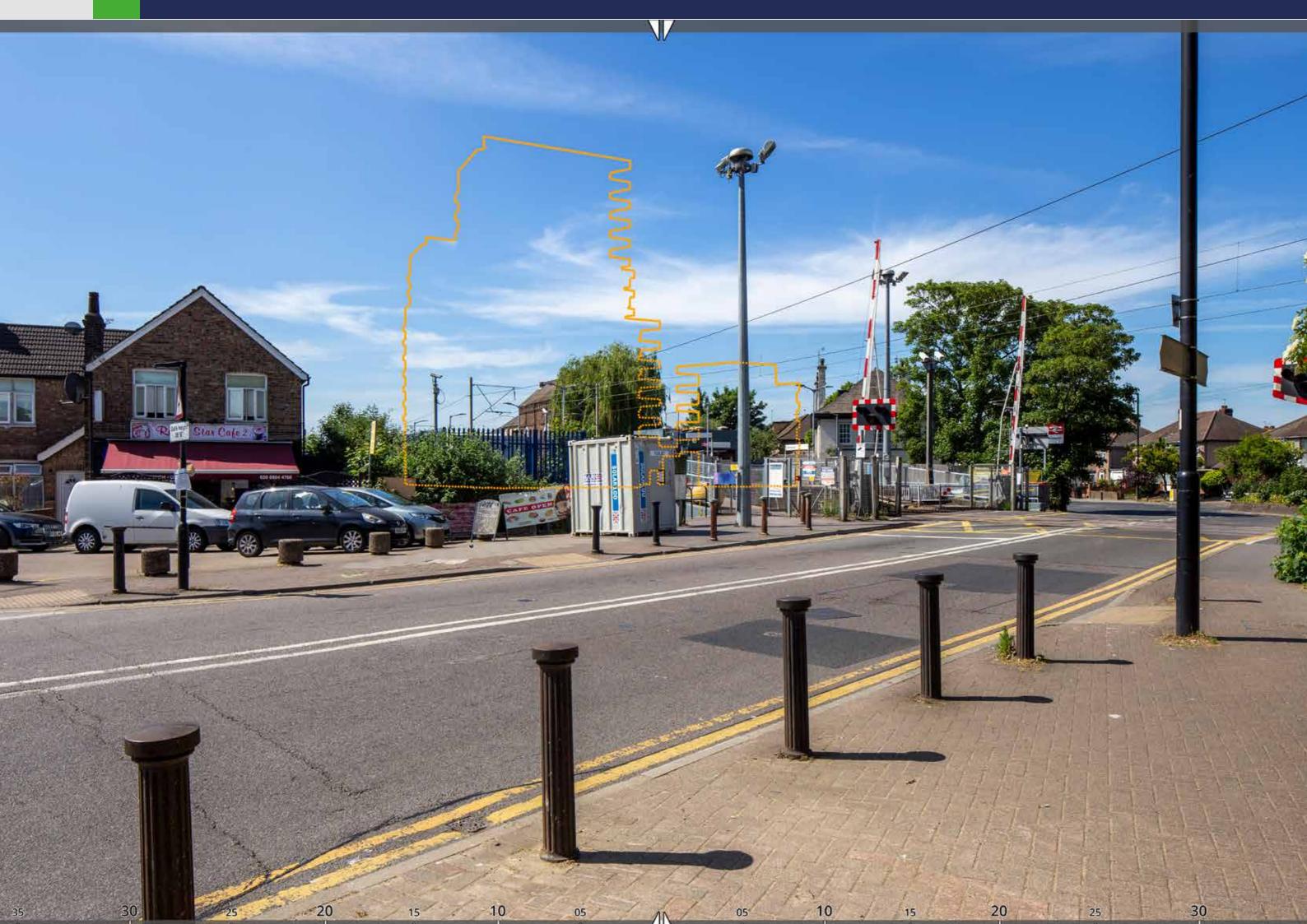
Proposed

At this closer location greater detail of the proposed development, indicated in an orange wireline, will be experienced but would successfully sit into the backdrop of this view, just behind the Station. The stepped form is very successful in grounding and integrating the proposed development into this central urban environment.

Effect

Greater indication of Brimsdown and the Station is considered to be a beneficial effect through redevelopment of the Site with a much taller and densified residential building. This route forms part of the wider 'Green Spine' landscaping strategy outlined by FH within the landscaping strategy which will link in with the proposed development and will result in an improved and welcoming awareness into this highly residential part of Brimsdown, combining in a beneficial effect overall through improved built form and public realm.





View 3 - Brimsdown Station Platform 1





Existing

Proposed

Existing

Brimsdown Station is an open platform accessed off the railway junction with Green Street. Platform 1 serves the route into London Liverpool Street Station and is highly used by local commuters travelling into and out of London. There is not much built form within this view other than the red and brown brick Station building which was previously used as the ticket office and some industrial warehouses off to the left of this frame.

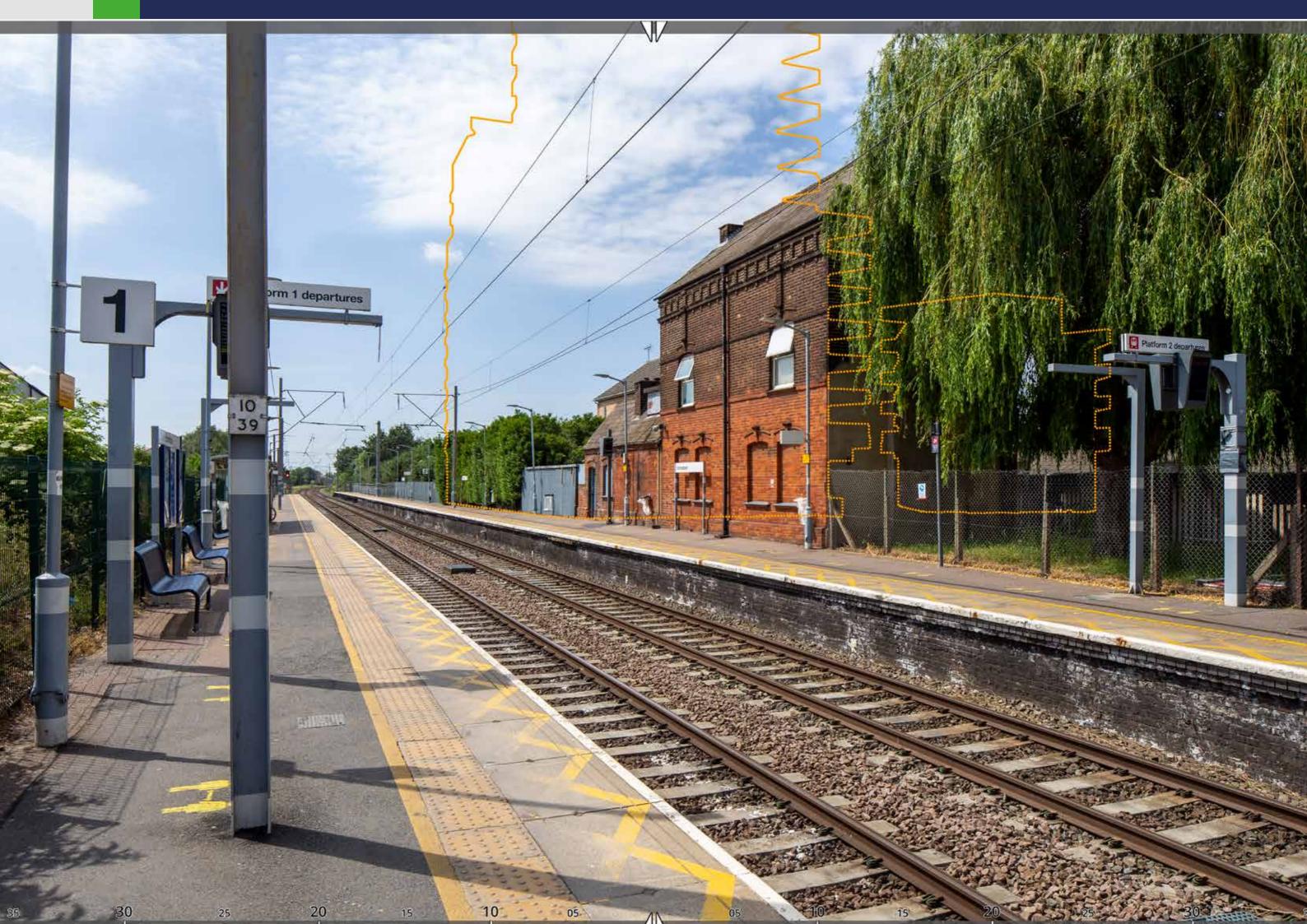
Proposed

The proposed development, indicated in a solid orange wireline where it would be visible and a dashed orange wireline where it would be occluded by the existing built form, would appear to the rear of the Station building and the existing planted boundary of the Site.

Effect

The higher level of development introduced by the proposed development will layer in a contextual manner to the rear of the Brimsdown Station ticket office building. The proposed external brick materiality relates to the existing built form and would complement the sparse local character that remains here. Through the introduction of greater built form the urban environment is strengthened and enhanced, better marking this central transport location.





View 4 - Junction of Green Street & Brimsdown Avenue





Existing

Proposed

Existing

At this corner junction of Green Street and Brimsdown Avenue there has been an attempt to create a public space with benches, block paving and boundary landscape but is underutilised and lacks integration or local activity. The irregular commercial units and residential dwellings along this point of Green Street are visible just beyond and Enstone Place residential development in the background.

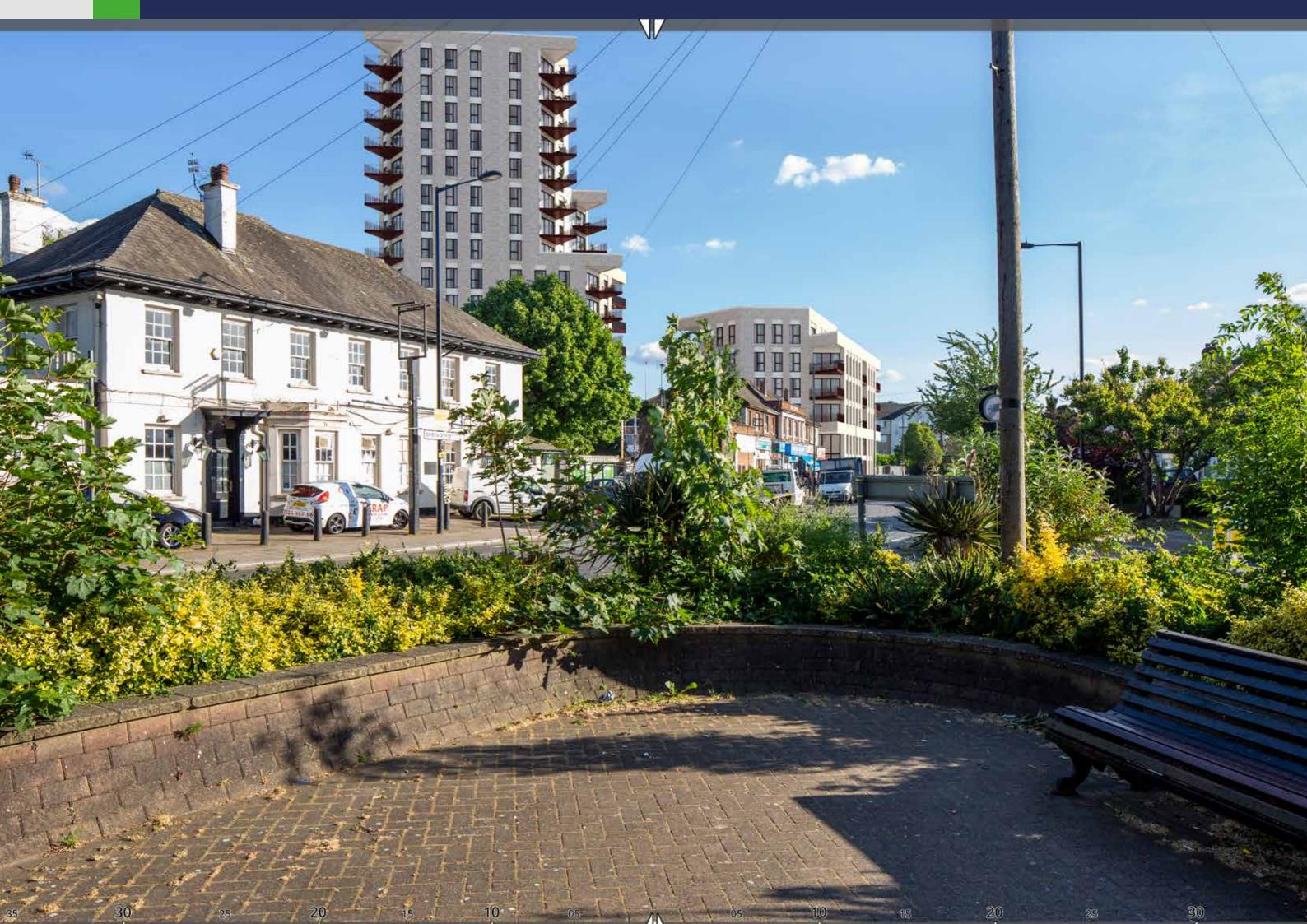
Proposed

The proposed development is included as a rendered visual in this view, allowing a greater understanding of the contextual brickwork materiality and the clever articulation and slimming of the taller Block B achieved through the arrangement of the projecting balconies. The new built form would appear to the rear of the existing built form located within the middle ground and would extend a more active frontage onto Green Street, appearing just to the left of the Enstone Place residential development.

Effect

The proposed development would have a transformative and beneficial effect on the local area. It would introduce a high level of change but would establish a higher quality of residential development, introduce commercial and community use and improved public routes and connections at this central location. The proposed design has been well considered and brings to the area a high quality modern development with contextual elements found in the materials incorporated. The proposed design has been kept simple, so as not to dominate the existing environment, but incorporates an adequate level of detail in the fenestration that helps introduce some vertical emphasis and overall enhances the elegance of the taller building.





View 5 - Brimsdown Avenue, intersection with Osborne Road





Existing

Proposed

Existing

Further north along Brimsdown Road from View 4, a greater understanding of the residential estate developments located just off the more main road of Green Street. Brimsdown Road has a high level of mature tree planting which is a positive characteristic in an area lacking in character but also doesn't allow much opportunity to examine the site until the viewer is beyond the tree covered canopy at this point on the route. A variation in residential developments is experienced here, to the right is the earlier estate development layout and to the left is the block architecture which started to establish here in the 90s, but there is no unity or interaction between these developments along Brimsdown Avenue.

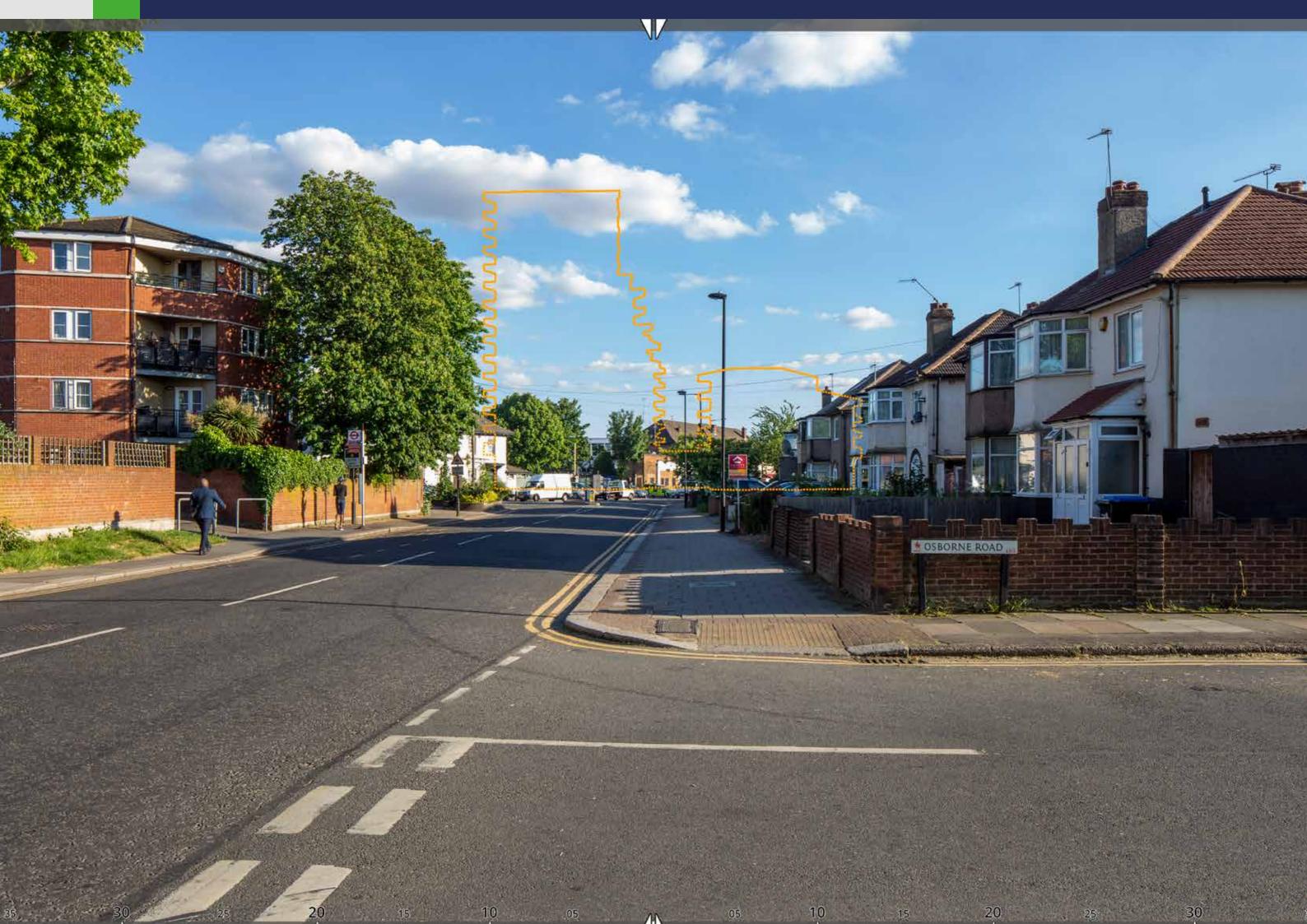
Proposed

The proposed development is indicated in an orange wireline and would appear within the background of this view. It would be the upper levels which would be taken in at this point and draw the viewer down Brimsdown Avenue towards the Station and renewed commercial offering here.

Effect

Through redevelopment of the Site a more complete and higher quality of residential architecture will be introduced to the Brimsdown area. The densification it would introduce is considered to be appropriate to its central location next to the Station but also contextual to the residential and commercial characteristics it is located next to. The overall effect is considered to be an improvement of the local area through strengthening of public routes and architecture of an elevated quality and consideration.





View 6 - Green Street intersection with Hunts Mead





Existing

Proposed

Existing

Approaching the Site from the west along Green Street a mixture of the 1960s and 70s development can be observed to the right adopted a residential block typology, whereas along the left-hand side is of a terraced estate typology. Again, the residential character of the area is one a detachment and lacks interaction with the streetscape or any connections between local neighbourhoods. Some tree planting introduces some form of relief to what is otherwise a residential area lacking in quality or sense of place.

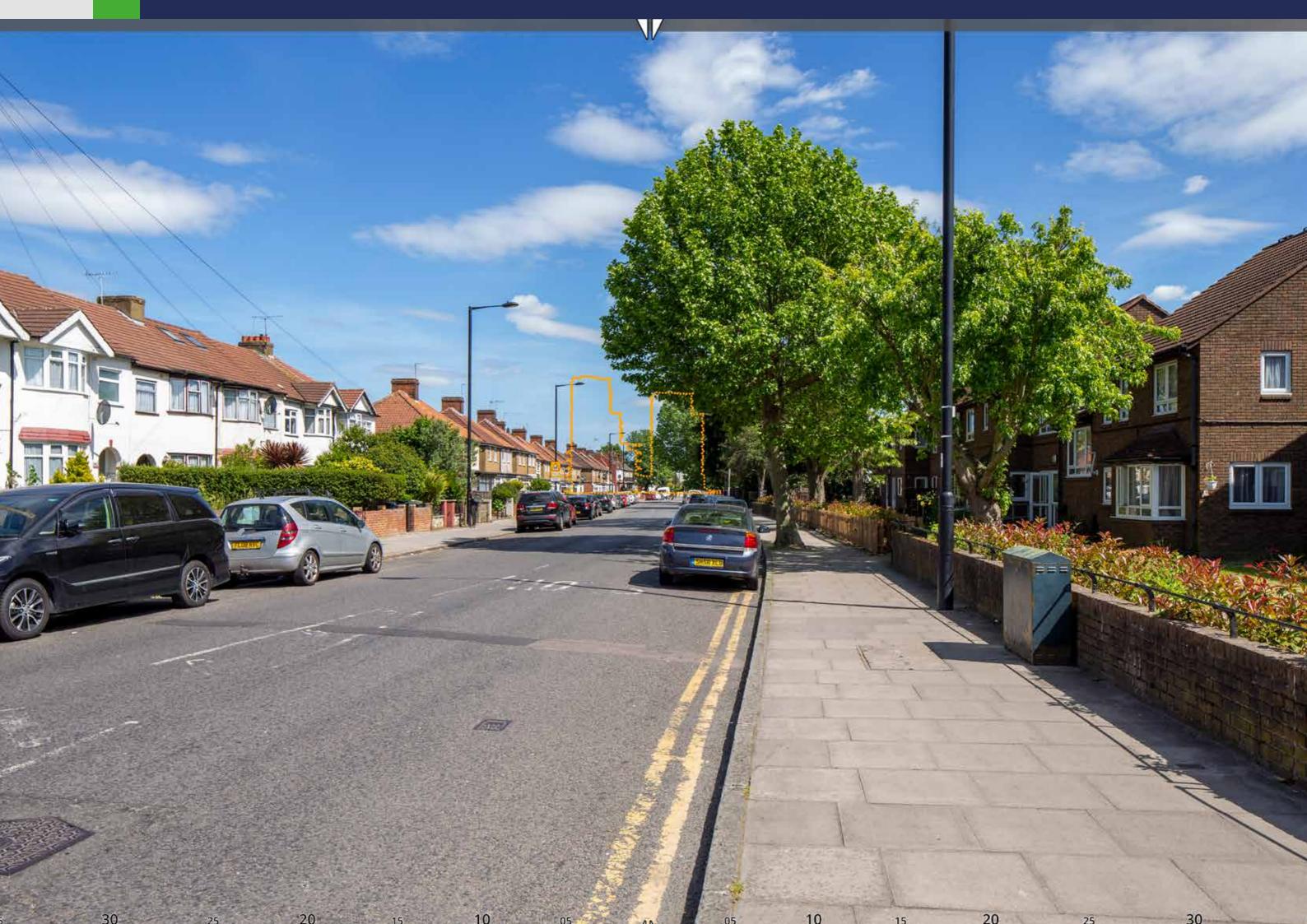
Proposed

The proposed taller form of the proposed development would appear in the distant background of this view. Where the proposed development would be occluded by the existing built form and landscaping is indicated with a dashed line and in this context would be much of the development. The upper levels of Block B and a small portion of Block C would be visible within the distant background of this view.

Effect

Appearing further along Green Street the proposed higher buildings would act as helpful markers of approaching Brimsdown Station, which there is no awareness of currently. The proposed architecture would be complementary and is considered to be a positive contributing element within an environment which lacks any distinctiveness or quality.





View 7 - Brimsdown Primary School





Existing

Proposed

Existing

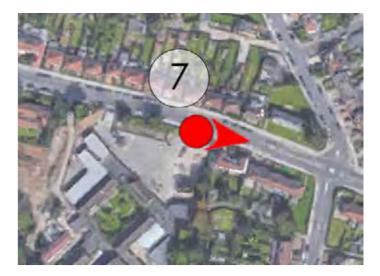
Approaching the Site more closely from the western approach the environment mostly remains residential with the exception of the Brimsdown Primary School, accessed just to the right of this view. The residential character at this point along Green Street is still mixed with no sense of uniformity other than the terraced estate typology. This is not a sensitive view.

Proposed

Within this rendered AVR the proposed development would be partly occluded and only the 14 storey Block C would be visible from along here. The rendered visual helps understand the detail of this taller building proposed and how the facade and balcony articulation brings to life the residential blocks being established in Brimsdown.

Effect

It's quite evident in this rendered AVR that the proposed development would be introducing a much higher quality and composition of development in this area. The proposed design and landscape strategy took great care and consideration of the local neighbourhood in how a varied massing form and generously planted development would effectively integrate a larger form at this location, which is evident from this perspective as the proposal sits quietly within the background, despite the larger massing. Not only would the proposed development mark more effectively the approach to Brimsdown but it would also introduce a much greater quality of architecture, considered to be of an enhancing effect.





View 8 - Enstone Road





Proposed

Existing

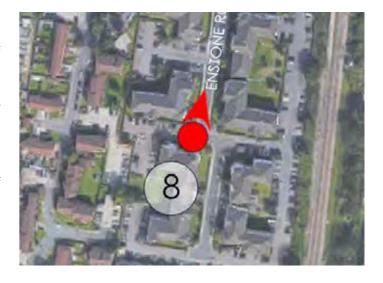
Located to the south of the Site is the 90s residential block estate that was laid out to replace an area that once was used by industrial buildings. The estate is an area of greater desification in Brimsdown. The architecture is not of particularly high quality but there is a more cohesive character of a residential community living here. The estate is laid out with quiet routes with cul-de-sacs and a decent level of greening on ground level. Although Enstone Road is not located too far from Brimsdown Station or centre there is no notable indication or awareness of this within this enclosed estate.

Proposed

The proposed development is indicated in rendered form and would appear to the rear of Anemone Court. and at the end of Enstone Road. The stepped massing between the proposed blocks effectively breaks down the proposed massing and would appear as a dynamic taller form within the background. There is an awareness of the new public route being introduced across the site at the end of Enstone Road and guided by Block A in how it curves into the Site. The lower levels of the proposed development and the lower massing of Block A is successful in transitioning the higher massing to the lower human scale.

Effect

The proposed contemporary architecture and massing is of a high quality and well-considered that it would appear quite contextually and also introduce a higher quality of design and public realm to the Brimsdown area. There would be a greater sense of place introduced through the improved public realm and routes through the Site. Futhermore, a strengthened streetscape through activation of frontage would be introduced resulting in an overall beneficial effect through the delivery of high quality development at this sustainable location.





View 9 - Braithwaite Road connecting to roundabout





Existing

Proposed

Existing

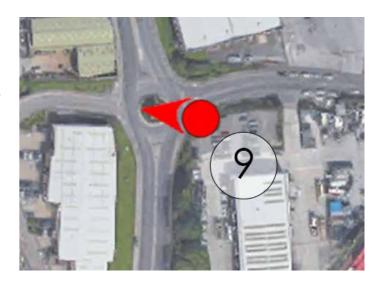
This is not a view of sensitivity but allows an understanding of how development such as the proposed development and the emerging masterplan schemes would be experienced from the high industrial area to the east of the train lines. Looking across the roundabout at Braithwaite Road towards the Site the area is dominated by transport routes and low rise storage facilities.

Proposed

The proposed development is indicated in an orange wireline and would appear within the background beyond the industrial development in the middle ground. The relationship and step down towards the south of Blocks B and C can be appreciated from this location. There would be a generous spacing between the blocks to allow a reading of the proposed group of buildings rather than one dominating mass.

Effect

Through redevelopment of the Site areas such as this, lacking in character relating to Brimsdown, would benefit from the proposed marker profile of the taller development next to Brimsdown Station. There would be a high level of change introduced but one of improvement and enhancing of the wider area.





View 10 - Lea Valley Bridge Road bridge over railway





Existing

Proposed

Existing

Further south along the railway line the bridge on Lea Valley Road allows an understand of those using the bridge crossing but also the potential effect for those approaching Brimsdown by train. Currently there is very limited built form visible between the very mature and generous wild planting either side of the railway lines.

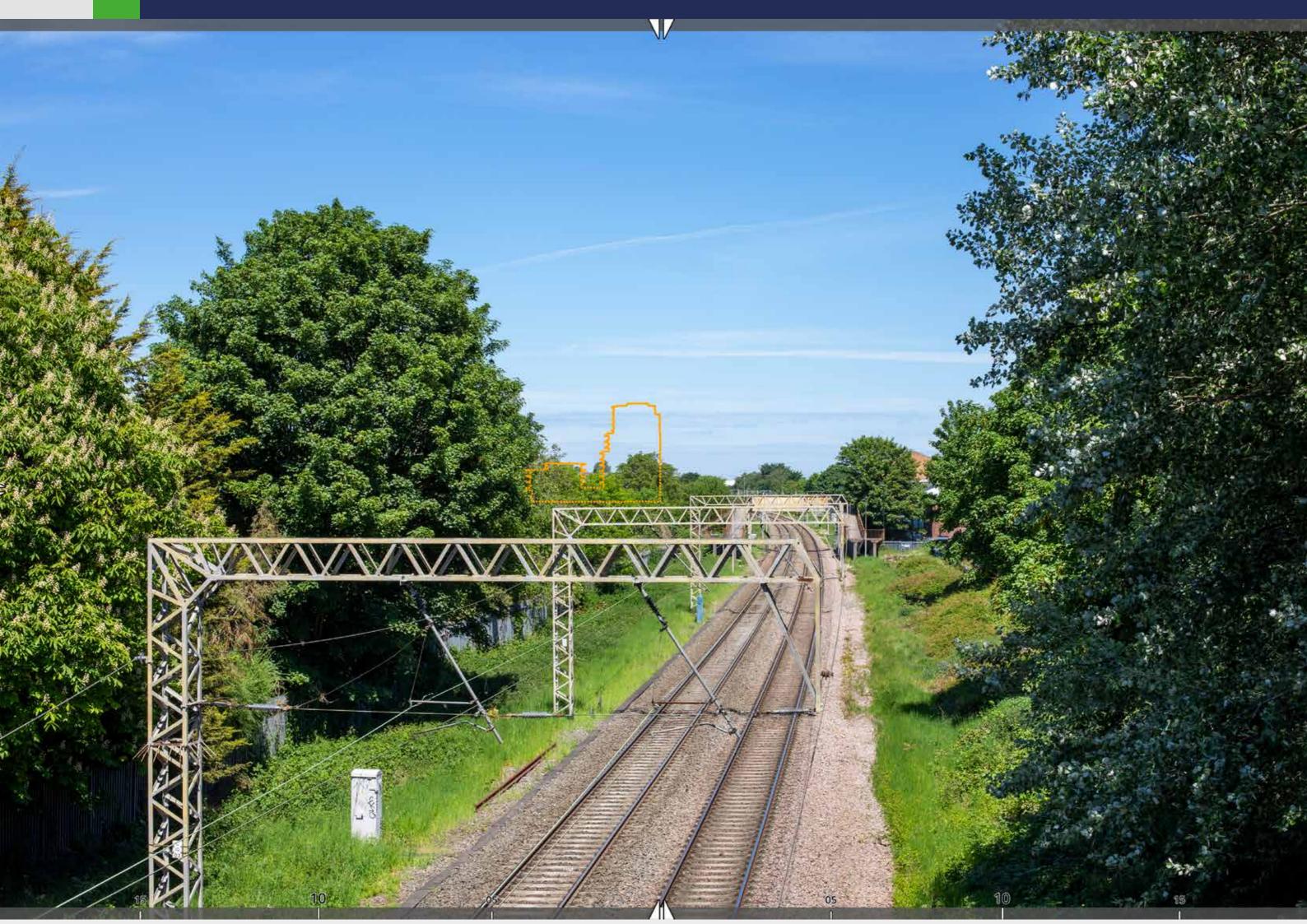
Proposed

The proposed development is indicated in an orange wireline and would appear within the background to the left. It would be mostly Block C and a portion of Block B above it that would be visible at this point. Block A would just about be perceived and would potentially be experienced in greater detail during winter months when foliage is lower. Unless the viewer was familiar with this area and route there would not be much in terms of distinctiveness to indicate that there is the town of Brimsdown up ahead.

Effect

The proposed development would announce the approach to Brimsdown through the visibility of the residential development. The proposed design and stepped form allows the proposed massing to sit into the landscape with some comfort and the high quality of architecture and contextual materials ensures that the change introduced is one of positive contribution.





View 11 - Alma Road





Existing

Proposed

Existing

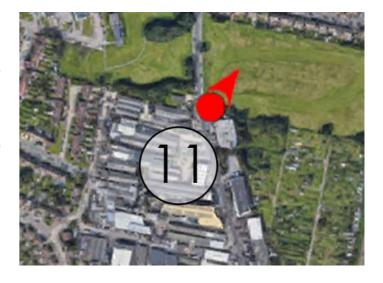
Looking towards the Site across the running playing fields and the rear of the Avondale Crescent semi detached estate development this is quite an open distant view which gives an appreciation of the quite sparse and disjointed nature of Brimsdown development that has been added over time. There is no relationship between the residential properties and the open amenity space but similarly there is not a sufficient distinction made between the private dwelling space and the informal public park.

Proposed

The proposed development is indicated in an orange wireline and would partly appear above the roofline of the Avondale Crescent estate dwellings. Block A and much of Block C would be occluded by the existing built form, indicated by the dashed orange wireline. The upper levels of the 16 storey Block B would be experienced stepping down to the 14 storeys of Block C which would ease the proposed higher building into the lower rise residential estate whilst also indicating the location of Brimsdown Station, which is currently lacking.

Effect

From this more distant location only a portion of the proposed development would be visible and would satisfactorily step up towards the Station, marking Brimsdown centre and the Station itself. The proposed architecture would be well layered owing to the variation in block form and the sculpted facade and angled elevations introduce a greater level of interest to this view, not to mention a higher quality of materials and detail, which would result in an overall improved built environment.





View 12 - Durants Park





Existing

Proposed

Existing

Looking across the vast open space of Durants Park towards the Site there is only limited built form visible at the edge boundary to the left of this view which contrasts significantly to the taller building of Tiverton House, just visible to the right and part of the 4 post-war residential development of up to 14 storeys. The main focus of the view is the amenity space and mature boundary planting of Durants Park with some built form patches intercepting.

Proposed

The proposed development is indicated in an orange wireline and would appear within the distant background above the mature trees in the background of Durants Park. Only the upper levels of Block B and Block C would be visible from here and the rest occluded by intercepting landscape or built form, indicated by the dashed wireline.

Effect

The proposed development would appear contextually as a built element appearing on the further outskirts of the Park but would introduce a much better quality of architecture and mark the central area around the Station that it would act as a positive wayfinding element for residents and visitors in the wider area. The proposed stepped form can also be appreciated from this location in how it helps integrate the proposed form with greater ease. Overall, the contribution made by the proposed development would be of a positive contribution.





Section 9 Conclusion.

9 Conclusion

- This THVIA report has assessed the historic development of the Site, its current appearance and contribution to the surrounding area, relationship to the emerging character of the area and described and assessed the significance of heritage assets whose settings may be affected by the proposed redevelopment of the site. The detailed assessment considers the potential impact on the existing built environment through redevelopment of the Site and introducing a development of up to 16 storeys at the location of 241 Green Street, Enfield, and therefore fulfils requirements set out in paragraph 189 of the NPPF.
- The existing buildings are considered to be of no heritage significance and do not contribute to the urban townscape, if anything it is a detracting element. The replacement of the existing buildings would result in a greater level of active frontage along Green Street, improved public realm through the site, significantly enhance the landscaping and greening of the Site and introduce a greater level of architectural interest through the variation of massing, simple yet elegant elevation treatment and high-quality materials.
- In heritage terms, the Site is not heritage sensitive nor the immediate townscape environment in which it is located. Heritage assets closest to the Site have been identified and assessed but the proposed development is considered to have no impact on the designated heritage assets through change to their setting and mostly down to the considerable distance these are from the Site. The only non-designated heritage asset identified for assessment was the vast Durants Park which, owing to its size, would be somewhat experienced in conjunction with the Site at certain parts more east of the park but would be a distant element which would be considered a positive element indicating Brimsdown Station and therefore of an enhancing quality.

The overall impact of the proposed development is considered a positive contribution to the local and wider townscape and having no adverse impact on the existing local and wider character. The proposed development promotes high quality design and sustainable development at this location, finding the optimal viable use for the Site, will improve the townscape environment along Green Street, as well as the wider area of Brimsdown Station and should be considered appropriate for development at this location. The proposed development is judged to comply with planning policy and guidance and is considered wholly acceptable for the reasons outlined within this assessment.

Appendix 1 References.

Appendix 1 References

A History of the County of Middlesex: Volume 5, Hendon, Kingsbury, Great Stanmore, Little Stanmore, Edmonton

Enfield, Monken Hadley, South Mimms, Tottenham. Originally published by Victoria County History, London, 1976.

Enfield Heritage Strategy 2019 - 2024, SPD, July 2019

Enfield Characterisation Study, Final Report | February 2011, Urban Practitioners

A new Local Plan for Enfield 2018 - 2036 November 2015

Appendix 2 Statutory List Entries.

Appendix 2 | Statutory List Entries

98 AND 100, GREEN STREET

Heritage Category: Listed Building

Grade: II

List Entry Number: 1358707

Date first listed: 31-Jan-1974

County: Greater London Authority

District: Enfield (London Borough)

National Grid Reference: TQ 35464 97150

Description

2. Probably C17 timber framed house now as 2 dwellings. 2 storeys, 3 windows in all. Roof, re-newed in machine tile, has massive ridge stack now rough rendered. No 98 has roughcast 1st floor, incised stuccoed ground floor, No 100 is weather-boarded. Modern casements and doors. Roof sweeps low behind. Inside, No 98 has some exposed beams and No 100 has 2 original doors of 6 equal-sized panels with heavy raised borders. Inglenooks boarded up. Graded somewhat for rarity value in this area in spite of alterations; and many of these are reversible.

Listing NGR: TQ3546497150

THE WHITE HORSE PUBLIC HOUSE

Heritage Category: Listed Building

Grade: II

List Entry Number: 1079538

Date first listed: 31-Jan-1974

County: Greater London Authority

District: Enfield (London Borough)

National Grid Reference: TQ 35549 97129

Description

1. 4411 GREEN STREET (North Side) The White Horse Public House TQ 3597 6/192

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2. Large timber framed building of C17 or earlier, considerably altered. 2 storeys and attic, 6 windows. High pitched hipped tiled roof with 3 gabled dormers. Exposed framing with plaster filling in 1st floor centre, tile hung sides. Modern plastered ground floor. Casements mostly C19 and modern, but one or 2 old ones remain. 2 modern porches on ground floor.

Listing NGR: TQ3554997129

WEIR WITH INLET PIPES AT KING GEORGE PUMPING STATION AND ADJACENT TO KING GEORGE RESERVOIR

Heritage Category: Listed Building

Grade: II

List Entry Number: 1358747

Date first listed: 14-Jan-1991

County: Greater London Authority

District: Enfield (London Borough)

National Grid Reference: TQ 37276 97851

Description

The following building shall be added:-

Swan and Pike Lane TO 39 NE (east side) 21/290 Weir with inlet pipes at King George Pumping Station and adjacent to King George Reservoir.

II GV

Weir with inlet pipes. Opened 1913. Designed by William Booth Bryan for Metropolitan Water Board. Italianate granite balustrade, set on English bond brick wall, is placed above 4 cast-iron-outlet pipes with upturned ends. Pipes emptied water into a brick chamber with a chamfered granite sill, over which the water flowed down a cascade into the reservoir. Weir is flanked by stepped brick walls with granite coping. (The Engineer, March 21, 1913, p.297).

Listing NGR: TQ3727697851

WATER TOWER HOUSE AT KING GEORGE PUMPING STATION

Heritage Category: Listed Building

Grade: II

List Entry Number: 1080991

Date first listed: 06-Nov-1974

County: Greater London Authority

District: Enfield (London Borough)

National Grid Reference: TQ 37281 97873

Description

In the entry for:-

Swan and Pike Lane TQ 39 NE (east side) 21/288 Water Tower House at King George Pumping Station

II GV

The description shall be amended to read:-

Water Tower House. Open 1913. Designed by William Booth Bryan for Metropolitan Water Board. English bond brick with limestone ashlar dressings: Edwardian Baroque style. Canted ends, each of 3 bays, have rusticated brick pilasters flanking full-height semicircular arched entry flanked by similar window openings: each end is framed by Tuscan columns supporting entablature with plain ashlar parapet. Entablature is continued across long side walls, which have similar window to centre of north elevation, and commemorative plaque set in similar architrave to south, framed by Tuscan columns supporting entablature. Interior: 4 cast-iron water towers with steel-plate tops. (The Engineer, March 14, 1913, pp.269-275).

SWAN AND PIKE LANE TQ 39 NE (east side) 21/288 Water Tower House at King George Pumping Station

II GV

Water Tower House. Opened 1913. Designed by William Booth Bryan for Metropolitan Water Board. English bond brick with limestone ashlar dressings: Edwardian Baroque style. Canted ends, each of 3 bays, have rusticated brick pilasters flanking full-height semi-circular arched entry flanked by similar window openings: each end is framed by Tuscan columns supporting entablature with plain ashlar parapet. Entablature is continued across long side walls, which have similar window to centre of north elevation, and commemorative plaque set in similar architrave to south, framed by Tuscan columns supporting entablature. Interior: 5 cast-iron water towers with steel-plate tops. (The Engineer, March 14, 1913, pp.269-275).

Listing NGR: TQ3728197873

Appendix 2 | Statutory List Entries

PUMP HOUSE AT KING GEORGE PUMPING STATION

Heritage Category: Listed Building

Grade: II

List Entry Number: 1079456
Date first listed: 25-Sep-1989
County: Greater London Authority
District: Enfield (London Borough)
National Grid Reference: TQ 37286 97892

Description

The following building shallo be added:

SWAN AND PIKE LANE TQ 39 NE (east side) 21/287 Pump House at King George Pumping Station II GV Pump House. Opened 1913. Designed by William Booth Bryan for Metropolitan Water Board. English bond red brick with limestone dressings, set on blue brick plinth; hipped Welsh slate roof Edwardian Baroque style. 9 x 3 bay elevations. Corner turrets with moulded stone cornices and diamond latticed windows; stone cill band beneath turret windows continued as moulded stone string course beneath parapets of main elevations. 9-bay side elevations have tall windows with glazing bars set in semi-circular arched architraves, with moulded stone edge to each arch set on moulded imposts, divided by rusticated brick pilasters; cast-iron casements with glazing bars set in plinth beneath; wide raised pilasters flank narrow entrance bay, which has bracketed hipped gablet and diamond-latticed lights set above tall semi-circular architrave with glazing bars to window set in rusticated stone surround above panelled door. Glazed clerestorey lights to roof. 3-bay end eleva-tions have similar entrance bay with panelled double doors, flanked by narrow revealed bays with glazing-bar windows, set in rusticated stone semi-circular arched architrave above and square-headed architrave below. Interior: glazed white brick walls, with dado and cornice of green brick; large cast-iron gantry moves along top of cornices; cast-iron roof trusses. Gas bags, housed in 5 circular cast-iron casings, supplied gas to 5 'Humphrey' gas pumps, housed in deep brick-lined pits, of which two remain 'in situ'. Each cast-iron pump, built by Siemens Brothers Limited, acted through internal combustion to raise 40 million gallons of water from the Lea Navigation into the King George Reservoir each day. Each pit has 4 water admission valves, arranged in a ring casing around base of combustion chamber, the water then being compressed into a cast-iron play pipe via the Water Tower House (q.v.) and Inlet Pipes and Weir (g.v.) into the reservoir. The pumps, the invention of H A Humphrey, dispensed with the usual pistons, flywheels etc, and were provided with their momentum by the free movement or oscillation of water between pump and tower: they are the first example of their type in the world. (The Engineer, March 14, 1913, pp.269-275).

Listing NGR: TQ3728697892

RETORT HOUSE AND KING GEORGE PUMPING STATION

Heritage Category: Listed Building

Grade: II

List Entry Number: 1079455
Date first listed: 25-Sep-1989
County: Greater London Authority
District: Enfield (London Borough)
National Grid Reference: TQ 37301 97931

Description

The following buildings shall be added:

SWAN AND PIKE LANE TQ 39 NE (east side) 21/286 Retort House and King George Pumping Station

II GV

Retort House. Opened 1913. Designed by William Booth Bryan for Metropolitan Water Board. English bond red brick with limestone ashlar dressings, set on plinth of blue brick; gabled corrugated asbestos roof. 4 x 2 bays. 4-bay side elevation. Raised stone impost bank links 3 semi-circular arched niches set between tall semicircular arched architraves with keystones, to double doors in outer bays and two central windows with glazing bars and some later brick infill. Moulded stone cornice is continued as band across corner turrets and as string course across gable ends. Each gable end has 3 graduated semi-circular arched windows with galzing bars, above stone impost band linking central semi-circular arched niche flanked by semi-circular arched windows with glazing bars. Interior: cast-iron roof trusses. The retort house stored gas, which was made from anthracite in Dowson producers, before it was passed through a scrubber into the gas bags of the Pump House (q.v.). Included for group value. (The Engineer, March 14, 1913, pp.269-275).

Listing NGR: TQ3730197931

Appendix 3 Visualisation Methodology Statement.

1768 - 241 GREEN STREET | TVIA REPORT 12.06.20

Method Statement

1 STANDARDS

- 1.1 The AVR images contained in this document have been produced in accordance with the best practices and advice taken from the following documents:
 - a) Revised Supplementary Planning Guidance, London View Management Framework, March 2012, henceforth LVMF
 - b) 2015 Erratum to the LVMF 2012 SPG
 - c) Landscape Institute: "Visual Representation of Development Proposals, Technical Guidance Note 06/19", henceforth TGN06/19
 - d) Landscape Institute/IEMA: Guidelines for Landscape and Visual Impact Assessment (GLVIA3)", henceforth GLVIA3.
 - e) Scottish Natural Heritage: "Visual Representation of
 - f) Wind Farms v2.2 February 2017", henceforth SNH 2017

2 SCOPE OF WORK

2.1 Rock Hunter Ltd. were appointed as imaging consultant, producers of AVRs and computer generated view study images by Iceni Projects on behalf of Stonegate Homes Limited. The architects are Matthew Lloyd Architects. Rock Hunter Ltd. is an architectural visualisation company with 18 years of experience in creation of 3D computer models, rendering and digital imaging.

3 AFFILIATION AND PLACE OF WORK

3.1 Rock Hunter Ltd. is not affiliated with any party involved in the planning, consultation or design of the 241 Green Street London project and is acting as an independent consultant on the project. All processing of data, documentation and production of this document has been carried out in Rock Hunter's offices at: 5a Priory Grove, London, SW8 2PD.

4 COMPUTER MODEL

4.1 Rock Hunter received a 3d computer model of the proposed development from Architects as well as selected architectural drawings and a site survey. The computer model was adapted to work with Rock Hunter's 3d modelling software and design changes where undertaken on instruction from Matthew Lloyd Architects on the basis of supplied architectural drawings to reflect the latest design. All AVRs in this document are based on this computer model.

5 PHOTOGRAPHY

5.1 Rock Hunter produced all photography used in these images. A digital 35mm format DSLR, mounted on a tripod, was used throughout the project. The details of each photo (Camera, Lens, Date, Time, as well the position are listed in the **Technical Methodology**). Unless otherwise specified, the camera is positioned 1.6m above ground level, and the positions permanently marked on the ground. Alternatively, where marking of the ground is impractical or not permanent, an existing, distinct feature on the ground was chosen, or the point marked with temporary markings and surveyed within a few days of the photograph taken.

6 SURVEY

6.1 A professional surveyor was commissioned to survey the marked camera location and a set of camera control points for each viewpoint. This is used to determine the location of the camera position and for camera control points, a set of survey points within each photograph that are used to demonstrate the accuracy of the camera match. The survey is carried out using a mix of GNSS, laser and optical theodolite systems and are tied into OS coordinates.

7 TYPE OF AVR SHOWN

7.1 Based on the above mentioned information and our computer model, Rock Hunter then generated a set of AVRs for each viewpoint. The set includes the baseline photograph, one montage showing baseline + proposed development, and a "baseline + proposed development + cumulative schemes". Depending on what type of visualisation has been agreed with the local authority, the proposed development will be shown as AVR1 or AVR3 (LVMF) / Visualisation Types 3 or 4 (TGN 06/19).

8 VERIFICATION

8.1 Rock Hunter publishes in this document in the **Technical Methodology** all relevant details of the recorded photographs and the source information of all computer models as well as the working methods used in the creation of the AVRs to which will allow independent verification of the AVRs.

9 METHOD STATEMENT

9.1 This document was created by Rock Hunter Ltd., and shows visual representations of the proposed development in accordance with LVMF "Accurate Visual Representation" standards and TGN06/19 "Survey-verified" standards.



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- a) The LVMF defines an AVR as: "An AVR is a static or moving image which shows the location of a proposed development as accurately as possible; it may also illustrate the degree to which the development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure so that it can be relied upon by assessors to represent fairly the selected visual properties of a proposed development. AVRs are produced by accurately combining images of the proposed building (typically created from a three-dimensional computer model) with a representation of its context; this usually being a photograph, a video sequence, or an image created from a second computer model built from survey data. AVRs can be presented in a number of different ways, as either still or moving images, in a variety of digital or printed formats."
- b) The TGN06/19 defines Survey-verified as: "Survey-verified photography involves using a surveyor, or survey equipment, to capture camera locations and relevant target points within the scene, which are then recreated in the 3D-model and used to match the camera image with a high degree of precision. Surveying equipment allows the camera location and fixed target points in the view to be calculated down to centimetre accuracy. Highly accurate visualisations may be produced by correctly matching the 3D model camera position and geometry of the view to the original photograph, using pixel level data, resulting in a survey-verified photomontage."

10 CHOICE OF VIEWS

10.1 Rock Hunter was provided with location maps for photography for each view by Iceni. Where no exact location was provided, Rock Hunter took candidate photography and alternative candidate photography based on aesthetic considerations. From these candidate views Iceni selected the final short list of camera locations.

11 FIELD OF VIEW

- 11.1 The TGN06/19 (p5, para 2.2) states that "Baseline Photography should:
 - · include the extend of the site and sufficient context;"

and that (p21, para 4.5.3) "Baseline photography should be carried out with a Full Frame Sensor (FFS) camera and 50mm Focal Length prime lens, unless there are exceptional conditions where wider-angle lenses are required to fully capture the scene (e.g. tall tower blocks - see below). In such cases, any departures from FFS +50mm FL should be explained and agreed with the competent authority.",

and that (p.28, para 1.1.7) "If a 50mm FL lens cannot capture the view in landscape or portrait orientation (for example, if the high-

est point of the development is approaching 18° above horizontal) the use of wider-angled prime lenses should be considered, working through the following sequence of fixed lenses in this order: 35mm FL > 24mm FL > 24mm FL Tilt-Shift."

and that (p.35, para 4.1.5) "Views should include the full extend of the site / development and show the effect of the it has upon the receptor location. Additional photographs may illustrate relevant characteristics, such as the degree and nature of intervening cover along a highway or footpath, without showing the site / proposal."

and that (p.36, para 4.2.1.) "The proposal under consideration and its relevant landscape context will determine the FoV (horizontal and vertical) required for photography and photomontage from any given viewpoint.",

and that (p.54, para 13.1.1) "The 24mm tilt shift is typically used for visualisation work where viewpoints are located close to a development and the normal range of prime lenses will not capture the proposed site"

11.2 The preference for a 50mm prime lens, or to use a prime lens in portrait mode often does not satisfy the para 1.17, para 4.1.5 or para 4.21 for confined urban contexts, and as such a compromise has to be found that produces a wide enough HFoV, as well as including the full height of the proposed development. The reason for each choice of lens that deviates from the "FFS +50mm FL" approach has been noted in **Table "Viewpoint figure notes"**.

12 SCALE VERIFIABLE

12.1 The images are show 325mm wide if the document is printed at it's correct size of A3. Using the viewing distance reference (TGN06/19 p.14 para 3.8.4 of 542mm) this results in a viewing scale of 89% for 50mm FL landscape views, and 50% for 24mm FL landscape views.

To view them between 100-150% as per TGN06/19, prints of 50mm FL views can either be viewed at a slightly reduced viewing distance, or if printed at A2 at 125%, in the middle of the recommended range.

24mm FL views have to be printed at A1 for a 100% scale representation.

12.2 To allow views to be assessed when viewed on screens, which can have a wide variety of sizes and thus unpredictable scale, a graticule overlay has been created for each view. This shows an angle grid for the HfoV and acts as a comparative ruler for the image assessors. The graticule also shows the centre of the view on the top and bottom bars, as well as an indicator for the calculated horizon level on the left and right bars. This helps to assess the amount of vertical shift that used in a photograph that was captured with a Tilt and Shift Lens.

13 EYE LEVEL, SHIFT, ROLL

- 13.1 The camera was mounted on a tripod, centred over the surveyed camera locations, so that the camera is vertically positioned 1.6m above ground level (measured to the centre of the lens). This can reasonably be considered eye level, and is an accepted common practice for creating AVRs.
- 13.2 Virtual cameras in 3D computer programs can currently not accurately simulate shift used on Tilt and Shift lenses. For the purpose of camera matching photographs with perspective control, the image canvas is enlarged vertically so that the horizon comes to rest again in the centre of the image and a standard camera simulation is used in the 3D software package.
- 13.3The camera is levelled horizontally with the aid of spirit levels or internal electronic level sensors. The resulting level is typically less than 0.5° in any direction, so that images can have both tilt (looking up or down) and roll (rotation of the horizon). Where possible, horizon control points where surveyed and allow the camera rotations to be determined from overlaying the horizon control points and photograph directly. If horizon control points are not available, the camera control points are used to derive a camera match, and in this process a good match can only be achieved when rotational parameters of the virtual camera correspond to the actual levelling errors of photograph.

14 CAMERA MATCH

- 14.1 Camera Control Points provided by the surveyor are used to establish a camera match. They are survey points of are easily identifiable, static objects in the view such as corners of windows, roofs, bases of street lights, chimney tops or road-markings. When camera matching only a virtual camera that has the same optical parameters and relationship to the 3D model, as the real camera's optical parameters and relationship to the real site will produce an accurate overlay of the Camera Control Points onto their corresponding features in the photographs.
- 14.2 For distances of more than 1000m we generally use a combined formula for compensating the curvature of the earth and atmospheric refraction to produce the correct Z offset for camera survey points. The formula is taken from the 2015 Erratum to the LVMF 2012 SPG, p. 282.

15 FRAMING VIEWS/ PANORAMAS

15.1 No photographs were cropped in this document. Where indicated for aesthetic reasons, a photograph was vertically extended by adding an additional photograph taken with a different amount of perspective control on the lens from the same location as the base photograph. This does not affect the quality of the camera match, as the full base photograph was used for camera matching.

12.06.20

15.2 The TGN06/19 makes a case for panoramas (p.36, para 4.2.1-4.2.5) for a variety of reasons. In Appendix 8 (pp.45-47)(para 8.4.1) it confirms the SNH 2017 approach to re-projecting rectangular projections from panoramas. (p.25, para 113). For panoramic views we capture a full 360° panorama. Camera matching, and the montage of the Proposed and Proposed + Cumulative versions are completed as 360° panoramas, before individual rectangular projection images are re-projected back for presentation, at the size and HfoV as required for each view.

16 COMPOSITING

- 16.1 Compositing aims to blend the computer generated content with the source photograph into a consistent montage. The proposed scheme will often be partially occluded by urban context. In long and medium distance views this will typically be buildings and terrain topography, for close views it may also include street lighting, signs, vegetation and movable objects like vehicles. The visualiser will determine the degree to which the proposed development will be visible by identifying its urban context in the photograph from site visits and notes as well as combining information from maps, camera survey data, a 3D context model, aerial and ground level photographs of the site and its surroundings. For close distance views the visualiser will determine the local context from general observations.
- 16.2 The proposed scheme may in places reveal context in the photograph that is hidden from the "existing" view when the existing buildings have a different massing to the proposed building. Where necessary, the revealed context was visually reconstructed from additional photography.

17 LIGHT AND MATERIALS

- 17.1 For fully rendered views the 3D software package uses a simulation of the sun which is set to the same date, time and geographic coordinates as the photograph. With these settings the software simulates angle and lighting of the sun and the 3D model is rendered in a virtual environment that presents a close match to the conditions in the photograph. Some differences may remain, due to haze, clouds and other atmospheric conditions at the time of the photograph, which the visualisation artist will correct using his/her experience and observations from the photograph.
- 17.2 The computer model itself is augmented with simulations of materials as specified by the architect. Using his/her experience and libraries of materials the visualiser will closely match these virtual materials to colour, reflectivity, refraction and light behaviour to their real-world behaviour. Such approximations are generally satisfactory in their appearance, however where directed by the design team or based on the visualiser's experience and judgement the appearance of materials may be adjusted when the AVR montage is assembled. Such alterations are generally holistic across the material and can include addition of environmental

reflections. The final appearance of materials will be adjusted as directed and is at the discretion of the architect.

18 COMPUTER MODEL

18.1 Rock Hunter combined the computer model as well as the camera survey data and maps into a common, unified coordinate system. This unified system allows schemes and cameras to appear correctly in relation to each other and is based on OS mapping information with datum point defined near the proposed site. Choosing a local datum alleviates inherent numerical tolerances that occur in 3D software packages.

19 CUMULATIVE SCHEMES

- 19.1 Computer models for cumulative schemes where produced by Rock Hunter Ltd. based on electronic or paper planning application drawings publicly available from respective local authorities, come from a our library of 3D models, or where provided by the project architect. Table List of cumulative schemes lists the sources for each scheme. The computer models were placed in the unified coordinate system, using any information contained in the original planning application documents. Some planning documents contain obvious errors or no relevant OS map information. In these cases the respective architects were contacted for more information (and where made available, used) or models were placed using a "best fit" by cross referencing information from other documents, maps and available sources.
- 19.2 Cumulative schemes are shown using a constant thickness wire outline. The line is generated from computer renderings of each scheme and represents an "inside stroke". This means that the outer edge of the line touches the massing of cumulative schemes from the inside.
- 19.3 Where schemes are not directly visible in a view, the outline is represented with a dotted line that also uses the "inside stroke" principle. Visibility of a development is determined by permanent visual boundaries such as a buildings, infrastructure, terrain and street furniture that obscure the development and by temporary visual borders such as vegetation, people, vehicles or temporary hoardings. We treat the visibility of the proposed development based on a best judgement. A single tree in leaf does not obstruct the development as seasonal or maintenance measures affect the opacity over time, a number of trees behind each other can obscure a development even without leaves. Where the visibility changes across a small section of image, we aim for clarity of the diagram.

20 LIMITATIONS

20.1Rock Hunter strives to work accurately and fairly throughout the creation of AVR images and employs a selection of advanced software packages and working methods. Despite all advances in computer simulations, rendering techniques and care taken in the process, no simulation is currently able to take into account all physical properties of camera equipment and all lighting effects inside the software package. The purpose of these AVRs is to allow a fair representation of the proposed scheme in it's photographic context as described in the LVMF and LI documents. Adjustments to the proposed scheme's appearance are done to the judgement and experience of the visualisation artist to allow for lighting and atmospheric conditions of the photograph, they are not however a scientific simulation.

21 OS INFORMATION AND LIMITING FACTORS

21.1 The basis of the 3D computer model and survey information are Ordnance Survey Sitemap® digital maps, at a 1:1250 survey scale. OS define their tolerances as follows:

Survey	Absolute accuracy com-	Absolute	Relative accuracy Dis-	Relative	
Scale	pared with the National	accuracy 99%	tance between points	accuracy 99%	
	Grid. Absolute error – root	confidence level	taken from the map.	confidence	
	mean square error (RMSE)		Relative error	level	
1:1250	0.5 metres	<0.9 metres	+/- 0.5 metres (60	<+/- 1.1 metres	
(urban)			metres)	(60 metres)	

Source: Ordnance Survey "os-sitemap-user-guide.pdf"

21.2 Camera locations which are positioned on bridges are typically subject to greater tolerances than camera locations which are positioned on stable ground. Bridges are flexible structures and can be subject to movement caused by vibration, loading and wind. This is especially noticeable on suspension bridges.



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Technical Methodology

22 TABLE OF CAMERA LOCATIONS

Job ID	Description	Date/Time	Easting/ Northing	Height AOD	Bearing	Distance	Camera	Lens	HFov
VP01	Mollison Ave looking South	2020-05-20 10:35:30.098	536397.824, 197187.033	17.11 m	209.748°	276 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VP02	South of MacDonalds on Green Street	2020-05-20 09:52:13.27	536343.166, 197096.525	17.37 m	210.937°	171 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VP03	Brimsdown Station Platform 1	2020-05-27 10:12:41.078	536319.708, 197033.847	18.44 m	205.556°	104 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VP04	Junction of Green Street and Brimsdown	2020-05-19 17:20:31.29	536283.197, 197074.876	16.93 m	191.672°	137 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VP05	Brimsdown Avenue	2020-05-19 17:34:56.003	536283.197, 197130.053	16.99 m	181.833°	192 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VP06	Green Street Intersection with Hunts Mead	2020-05-19 13:56:38.084	535841.583, 197010.345	17.91 m	100.83°	444 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VP07	Brimsdown Primary School	2020-05-19 14:35:17.072	535988.244, 196974.836	17.43 m	98.0753°	294 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VPO8	Enstone Road	2020-05-19 16:17:37.3	536213.162, 196805.942	17.53 m	11.694°	148 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VPO9	Braithwaite Road connecting to roundabout	2020-05-20 09:19:41.5	536483.980, 196866.243	18.67 m	293.59°	216 m	Canon EOS 6D	TS-E 24mm f3.5L II	72.9 °
VP10	Lee Valley Road birdge over railway	2020-05-19 11:54:21.078	536154.125, 195888.236	22.49 m	7.6161°	1057 m	Canon EOS 6D	EF50mm f/1.4 USM	38.4°
VP11	Alma Road	2020-05-19 12:43:26.082	536031.551, 196486.723	17.11 m	26.0372°	515 m	Canon EOS 6D	EF50mm f/1.4 USM	38.4°
VP12	Durants Park	2020-05-19 13:20:25.039	535567.067, 196632.413	17.91 m	66.7845°	776 m	Canon EOS 6D	EF50mm f/1.4 USM	38.4°

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23 CAMERA LOCATIONS

23.1 Top row: VP01 Tripod Location

VP02 Tripod Location VP03 Tripod Location

23.2 Second row:

VP04 Tripod Location

VP05 Tripod Location

VP06 Tripod Location

23.3 Third row:

VP07 Tripod Location

VP08 Tripod Location

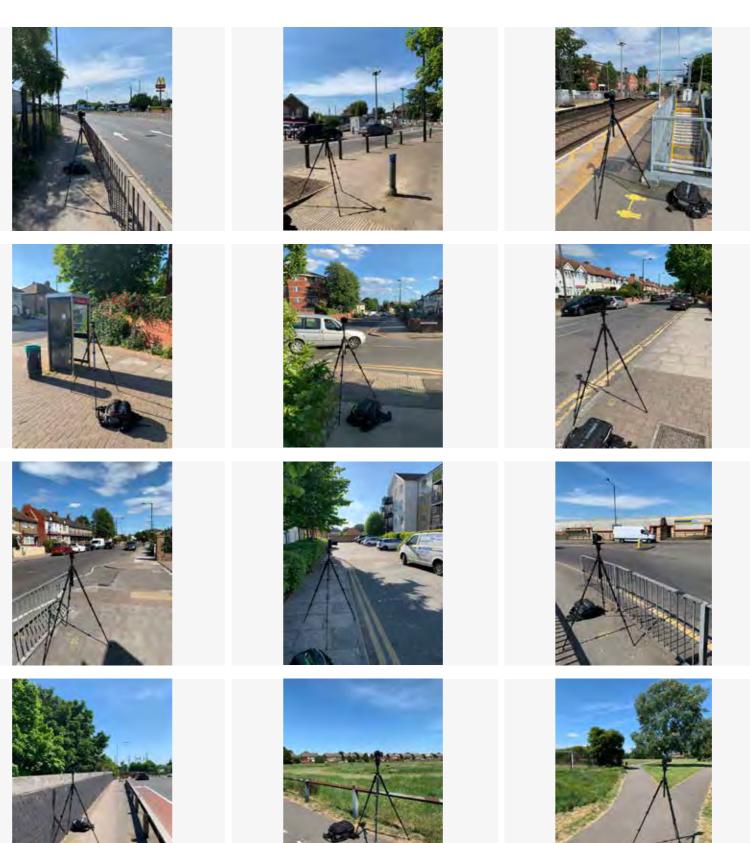
VP09 Tripod Location

23.4 Fourth row:

VP10 Tripod Location

VP11 Tripod Location

VP12 Tripod Location



The following illustrative study investigates the potential cumulative context relating to the emerging masterplan for the area next to Brimsdown Station, which the site is located within. The 12 views have been testing using Vu.City 3D modelling showing the proposed massing within the existing environment and the anticipated emerging cumulative context. The views tested are indicated on the accompanying maps. Vu.City modelling presents the proposed development within the existing context to an accuracy of within 15cm. Each view shows the existing context (photograph and model image), the proposed development and the proposed development within the illustrative emerging context which has been indicated by Enfield Council and mocked up by MLA.

It is clear from the illustrative cumulative study that the proposed development would sit contextually to the south-west of the masterplan area and step up towards the central area and transport node of Brimsdown Station. The overall impact is considered to be beneficial and would introduce a high level of improvement to the area of Brimsdown.





View 1





Existing





Proposed

Cumulative

View 2





Existing



Proposed

Cumulative

View 3





Existing



Proposed

Cumulative

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View 4





Existing





Proposed

Cumulative

View 5





Existing





Proposed

Cumulative

View 6





Existing





Proposed





Existing





Proposed

Cumulative

View8





Existing



Proposed

Cumulative

View 9





Existing





Proposed

Cumulative

View 10





Existing



Propose



Cumulativ

View 11





Existing



Proposed

Cumulative

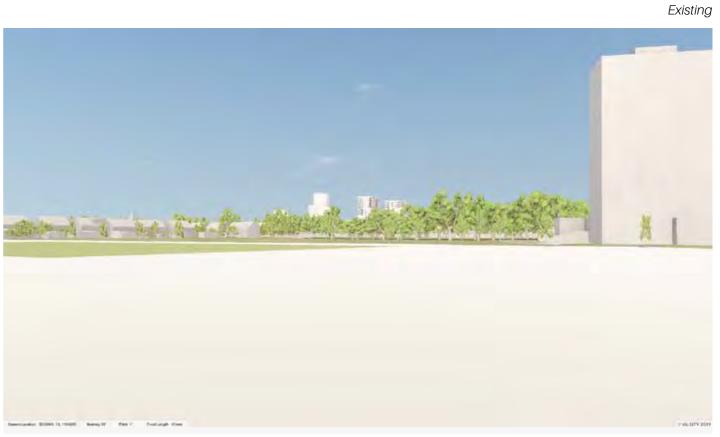
View 12











Proposed



Delivery | Design | Engagement | Heritage | Impact Management | Planning Sustainable Development | Townscape | Transport

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Glasgow: 177 West George Street | Glasgow | G2 2LB

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