

Church Street, Edmonton
and
Fore Street Edmonton
Conservation Area
Enfield
Management Proposals



Reviewed and updated

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CHURCH STREET, EDMONTON AND FORE STREET, EDMONTON CONSERVATION AREA MANAGEMENT PROPOSALS

THE MANAGEMENT OF CONSERVATION AREAS IN ENFIELD

This document is based on the report prepared by Drury McPherson Partnership in 2013-14. The text was reviewed and revised by Enfield Council in 2015 and the conclusions and recommendations are those drawn up by the Council.

The Purpose of Conservation Area the Management Proposals

The management proposals set out a framework for managing change in, and the conservation and enhancement of, Enfield's conservation areas, to ensure that they retain the special qualities that led to their designation. It helps to fulfil the Council's duty under section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to prepare proposals for the preservation and enhancement of conservation areas. These proposals are particularly relevant where there is pressure for development and where cumulative minor changes may be affecting the character or appearance of the conservation area.

Historic England Guidance on Management Proposals

Historic England (formerly English Heritage) guidance on the management of conservation areas is contained in *Understanding Place: Designation, Appraisal and Management of Conservation Areas* (2011)¹. Although this predates the publication of the National Planning Policy Framework (2012), it is the most up-to-date guidance available. There is no reason to think that its advice on conservation area management (which is largely carried over from earlier guidance published in 2006²) is likely to change substantially.

The London Plan

The Mayor's London Plan (2011, amended 2013) Policy 7.8 seeks to protect the historic environment through the application of appropriate local development management policies which should identify heritage assets (including conservation areas) and ensure that development affecting them should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Enfield's Planning Policies

The key national and local planning and development management policies affecting conservation areas are set out in section 1.4 of the conservation area character appraisals. The conservation area appraisals and management proposals have been approved by Enfield Council. The appraisals form part of the

¹ Available from Historic England website, www.helm.org.uk

² English Heritage *Guidance on the management of conservation areas* (2006).

"evidence base" for the conservation policies in Enfield's Local Plan. They support the planning policy framework of the Core Strategy and the Development Management Document. The management proposals will be incorporated in the Enfield Design Guide Supplementary Planning Document (SPD) in due course and as such they will be given considerable weight in the determination of planning applications affecting the conservation areas.

Infrastructure Delivery Plan

The Infrastructure Delivery Plan (IDP) (2014) is a strategic document that identifies a number of infrastructure needs, including those affecting the historic environment. It amplifies guidance on delivery and funding and provides further detail for identified projects, some in conservation areas.

Planning policy delivery

Since the conservation area character appraisals were published in 2006, the Council's Core Strategy has been adopted (2010), which includes over-arching policies for the protection of the Borough's historic built environment (Core Policy 31). The Development Management Document, containing detailed policies for the determination of planning applications, was adopted in November 2014.

Annual monitoring of conservation areas has been undertaken by the Enfield Conservation Advisory Group and local societies and reported to the Council. The outcomes of this monitoring have been incorporated in the revised character appraisals and management proposals as appropriate.

Grants

Subject to available resources, the Council will work with partners to provide carefully targeted grant-aid to historic buildings and conservation areas, including, where appropriate, Historic England (formerly English Heritage) and Heritage Lottery Fund grants.

Design and other Guidance

The Council's forthcoming Enfield Design Guide will provide advice on alterations to residential properties, including extensions, roof alterations, architectural detailing and appropriate materials. The Design Guide will also include area-specific design advice and it will incorporate these conservation area management proposals. The Council will help owners and their agents to achieve acceptable proposals within conservation areas through the pre-application advice service³. In some cases, applicants for major developments will be required to support their applications with a master plan.

Planning Decisions

Planning applications affecting conservation areas will be determined with regard to the National Planning Policy Framework (NPPF) (2012), Enfield's Local Plan, the approved conservation area management proposals and the emerging Enfield Design Guide, and having regard to advice from the Council's Conservation Advisory Group. The NPPF is supported by the Government's Planning Practice Guidance: Conserving and enhancing the historic environment (2014).

In line with the NPPF and Enfield's Policy DMD 44 and supporting Appendix 6 applicants for development affecting a heritage asset or its setting should provide a Heritage Statement, describing the significance of any heritage assets affected by development proposals, and the contribution made by their setting, as part of any application affecting a property within a conservation area. The Council will not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents. The Heritage Statement should contain the information required to assess the impact of the proposals. Detailed requirements are set out in the Appendix on Heritage Statements. (DMD 6.5.7)

Enforcement

The Council will continue to ensure that the planning system is not abused. Planning enforcement by the Council's Planning Enforcement Team will prioritise unauthorised works to listed buildings, protected trees and within conservation areas. The Council will always seek to persuade owners to restore and put right any offending works, but will, where necessary, take enforcement action to achieve those aims. Where there is a demonstrable public interest in so doing, offenders may be subject to criminal prosecution.

Unauthorised works requiring planning permission undertaken four years or more before discovery by the authorities are deemed approved (there is no such limitation on unauthorised works requiring listed building consent or conservation area consent).

Dated photographic records of buildings within conservation areas will be used, where available, to provide evidence for enforcement action.

Where appropriate the Council will also use its powers under S215 of the Town & Country Planning Act 1990 to address properties that adversely affect the amenity of a neighbourhood.

Section 106 Agreements

The Council will continue to use Section 106 Agreements to assist in conserving and enhancing its conservation areas. These are agreements between the Council and a developer, whereby the developer undertakes works or makes a contribution (financial or in kind), to the Council to offset or mitigate any adverse

impact of the development on the surrounding social or physical infrastructure. Where a development has an impact on a conservation area, the Council will require the developer to enter into a s.106 Agreement where, on balance, adverse impacts cannot be completely mitigated through the development itself. Receipts from such agreements may be used, as appropriate, to help deliver the management proposals set down in this document

The Community Infrastructure Levy (CIL) is a system for securing developer contributions through the planning system. It allows local authorities (and the Mayor of London) to charge a levy on new development in their area. Funds raised from the Levy are used to provide essential infrastructure identified on the CIL Regulation 123 List. It is anticipated that an Enfield CIL will be in place in Spring 2016. A proportion of CIL monies collected can be spent on neighbourhoods, the Neighbourhood Proportion of the CIL has most potential to contribute to historic buildings or other heritage assets.

Highways and the Public Realm

The Council will respect the special character of conservation areas when undertaking environment improvements to highways and the public realm, including new facilities such as cycle paths, having regard to conservation area character appraisals and these management proposals. Excessive street furniture and standard traffic management features such as railings, coloured surfaces and carriageway markings can be particularly harmful in conservation areas. Wherever possible, the Council will remove unnecessary street clutter in conservation areas. Street patterns that contribute to the special character of conservation areas and historic street and footway surfacing will be retained where possible.

The Council will, wherever possible, use its planning powers and agreements with developers (such as s106, s207 and s.38 Agreements) to secure additional funding to ensure a high standard of works to the public realm within conservation areas. The Council has approved Streetscape Policy and Guidance⁴ for the management and maintenance of the public realm, including that within conservation areas. Street lighting throughout the Borough has been renewed since 2006 under a PFI contract. Where street lighting in a conservation area has been replaced to a non-standard specification, reflecting the special character or appearance of the area, this standard will be maintained in any future replacement scheme.

The Council will normally resist the conversion of front gardens to car parking, where the gardens contribute to the special character or appearance of a conservation area. The introduction of new footway cross-overs, the removal of boundary walls and paving will not normally be allowed, in line with Development Management Policy DMD 46 and Core Policy 30.

Satellite dishes

Planning permission is required for the installation of any satellite dish or communications antenna installed on a chimney, wall, or a roof slope, which faces onto, and is visible from, a road, within a conservation area. Such antennae will not normally be permitted. Further details are available from the Government's online Planning Portal⁵.

Archaeology

More than one-third of the area of the Borough is designated as an Area of Archaeological Importance⁶. Development proposals should take into account any potential impact they may have on archeological remains. Heritage Statements should include a desk-based assessment of the archaeological interest of the site. Expert assessment may be necessary depending on the significance of both the asset and the proposed works. Advice should be sought from the Council's heritage officers and/or Historic England regarding the extent of this work.

Open Spaces

In line with the Core Strategy, the Council will protect and enhance existing open spaces in the Borough. Open spaces play a key role in the character of many conservation areas and where they are heritage assets (such as many open spaces in conservation areas), they will be preserved and enhanced, in line with Core Policy 34 and Development Management Policy DMD 71.

Trees in Conservation Areas

The Council will continue to recognise the importance of and protect trees in conservation areas, whether in streets and parks, or on private land in line with Core Policy 30 and Development Management Policy DMD 80.

The Planning (Listed Buildings and Conservation Areas) Act 1990 requires owners to give six weeks notification of any intended works to trees on private land within conservation areas. This is to allow councils to make an assessment of whether the tree in question has sufficient amenity value to be worthy of protection through the serving of a Tree Preservation Order. The Council will ensure that all such trees reported will be carefully assessed and any that are deemed worthy will be so protected.

The Council will ensure that any future necessary replanting will be with species that accord with the prevailing character of the street or area. The Council will continue to manage the growth potential of certain pollarded species.

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In conservation areas, trees will be replaced on a like-for-like basis wherever possible, particularly where the replacement is one of a group or avenue of identical species. If possible, modern improved varieties of the species will be chosen where that will reduce the risk to adjacent properties. However, where replanting with the same species is impractical for sound arboricultural reasons, appropriate alternative species will be chosen.

The Council has adopted a Corporate Tree Management Strategy, which provide the basis for works to trees in streets, public parks and elsewhere in the public realm, including those within conservation areas.⁷

Monitoring Change

The Council will monitor change in the Borough's conservation areas, with reference to the conservation area character appraisals and management proposals and in partnership with the Conservation Advisory Group

Monitoring the Effectiveness of this Document

The Council will aim to ensure that the management proposals are kept up-to-date and relevant through five-yearly reviews of the conservation area character appraisals and management proposals.

CHURCH ST./FORE ST. CONSERVATION AREA MANAGEMENT PROPOSALS

Summary of special interest

The key factors that give the Church Street, Edmonton and Fore Street, Edmonton Conservation Areas their special interest are summarised in **Section 3 of the Character Appraisal**. These are the things that make up the character and appearance of the area which it is desirable to "preserve or enhance" through management action.

Conservation Area boundaries

The 2006 CAMP recommended that the boundary of Fore Street Conservation Area should be extended to encompass a single, linear designation. The historic character of most areas then proposed for inclusion no longer justifies designation. The architectural character of more marginal inclusions has been eroded. NPPF policy 127 sets out that conservation area designation should only include those areas that merit it. In this context, it is proposed that Fore Street Conservation Area boundaries be revised to exclude a section of the Conservation Area to the south west of the North Circular (A406) between numbers 151 and 179. A further section to the east side between numbers 120-150 is also of insufficient quality to support continued inclusion. This will enable focus upon

those groups of buildings most worthy of designation. The current (revised 2009) boundaries of Church Street Conservation Area are confirmed.

Summary of issues

In 2006, Fore Street conservation area was considered of marginal quality, although sufficient to merit designation, but it was believed that a successful management strategy could recover some of what had been lost and secure its future. The situation, however has not improved. The strategies proposed to address the problems in 2006 - above all, the extensions to Fore Street Conservation Area to encompass the whole of the historic neighbourhood - have not been adopted and owing to alterations and loss of historic fabric in the areas identified, they are no longer viable. Breaches of control have proved difficult to enforce against. The special character and appearance of the designated areas and their settings has been significantly eroded since 2006, While no significant buildings have been completely lost, the issues identified in 2006 remain of serious concern. To the south of the North Circular, the variable and fragmented quality of the buildings and the current eroded condition means that sections are now proposed for de-designation, although with a recommendation that the former Burton's building (nos.169-171), nos. 134, 172, 196 and the former bank at no. 198 are considered for addition to the local and/or statutory lists. Attention will be re-focused upon conserving and enhancing the small groups of buildings along both Fore St. and Church St. rather than attempting to impose a linear designation.

Unlike Fore Street, Church Street Conservation Area retains more of its underlying heritage merit in a continuous street frontage. It has also been seriously compromised, but it retains spatial coherence and historic integrity. In this context, for both conservation areas, a clear commitment by the Council to conservation as a central consideration in determining planning applications, and a rigorous planning enforcement policy could, over time, ameliorate much of the damage. Focusing resources on Church Street and a redrawn Fore St. would have a greater chance of success than sustaining a fragmented conservation area that is difficult to enforce.

The issues affecting the Conservation Areas, which need to be addressed if their continued designation is to be justified, are summarised in **Section 4 of the Character Appraisal**, as follows:

- *Incomplete delivery of the management objectives adopted in 2009*
- *The loss of the urban structure and enclosure of Fore Street north of the North Circular Road*
- *A traffic-blighted, generally poor quality, public realm*
- *The poor quality of many new buildings and their lack of positive relationship to context*
- *The need to achieve a higher standard of new-build contextual design in infilling gap sites and in redevelopment*

- *The need to ensure that investment in commercial enterprises results in good standards of building design*
- *Ongoing erosion of the details and so quality of, particularly, unlisted historic buildings*
- *The poor state of repair of many historic buildings*
- *The poor quality of many shop frontages*
- *The proliferation of advertisement boardings*

Priorities for action

Based on the detailed assessment provided by the Church Street, Edmonton and Fore Street, Edmonton Conservation Areas Conservation Area Character Appraisal and the problems and pressures identified by it, the following management actions are proposed over the next 5 years in the Conservation Area in order to preserve and/or enhance its special interest:

Buildings at Risk

The Historic England (formerly English Heritage) 2015 Register of Heritage at Risk (HAR) in London includes both Church Street and Fore Street conservation areas in their entirety. The following measures will be taken: Fore Street should have its boundaries redrawn to concentrate attention upon groups of buildings rather than a single, linear conservation area and a strategy based on the proposals set out below will be focused on this and Church Street.

The following individual buildings (all in Church Street) are included on the Register of Heritage at Risk: All Saints Church (condition “poor”), New Covenant Church (former Charles Lamb Halls; condition "poor"), and the former Edmonton Girls Charity School and adjoining cottage (condition “poor”). Works to the church tower were completed with a HLF grant in 2015. HLF-funded repairs to the New Covenant Church were due to start on site in the summer of 2015, with further works needed in a subsequent phase. A condition survey and options appraisal have been completed for the school and cottage. When funding has been secured (and viable new uses identified as appropriate) the buildings will be repaired as a high priority.

Building repair and maintenance

Many of the buildings are in poor condition, including some previously repaired with public funding. This suggests that property owners see little benefit in building repair to conservation standards. A key to positive change would be to encourage community engagement, education and design guidance, to recognise the historic character of the area as a valuable part of its identity and as a potential economic asset, rather than a liability. If grant aid for building repair is available (other than for the buildings "at risk" noted above) it should be targeted on a defined and coherent area, or building group, rather than on isolated individual buildings, and closely monitored, and supported by enforcement post-award.

Development pressures/opportunities

Part of the conservation area is also within the area covered by the draft Edmonton Masterplan and there are proposals for intensified development to the eastern end of Church St and along Fore St. These will be progressed with a view to maintaining the special interest of the conservation area. Furthermore, a larger-than-usual number of buildings contribute negatively to the character of the areas and as such, these have potential for redevelopment. Several sites forming the setting of the conservation areas, most notably the post-war public housing estates and Edmonton Green shopping centre, could be subject to major redevelopment, which could have a substantial impact on the adjoining areas. Conversely, sensitive restoration of these buildings could help to enhance them. Of the post-war public housing, the Fore St/Beaconsfield Estate is of particularly high quality.

Design of new buildings

The poor quality of new building design has been a major factor in the erosion of the character of the areas. New buildings within and forming the setting of the conservation areas should only be allowed if they are carefully designed to reflect the historic character, use, scale, grain and appearance of the conservation areas.

Setting of the conservation area

For both Church St and Fore St conservation areas, the effect of new development on their setting needs to be a prime consideration. Consistent with the NPPF, the Council will expect proposals to address guidance in Historic England's publication Historic Environment Note 3: The Setting of Historic Assets and to preserve and enhance the special architectural and historic interest of the conservation areas. Applications which fail to do so sufficiently will be resisted.

Architectural detail

A substantial number of buildings including some identified as landmarks, and/or making a positive contribution to the character of the area have been harmed by alterations. They include the former bank at 198 Fore Street and historic pubs in Church Street and Fore Street. Material change to the external appearance of most buildings in the conservation areas is subject to planning control and permission will not be granted for inappropriate alterations. Unauthorised works will be subject to enforcement and a concentrated programme has begun to pursue enforcement action within the conservation area. Development affecting listed and locally listed buildings and buildings identified as making a positive contribution to the character of the area, and buildings affecting their setting, should normally use appropriate traditional historic materials and detailing. Mass-produced modern materials, such as uPVC and concrete roof tiles, will not normally be appropriate within the conservation area.

Street furniture, signage and advertising

Throughout the area, but especially in Fore Street, excessive street clutter and uncontrolled advertising signage dominate the public realm. Internally illuminated

hoardings are inappropriate in the conservation areas, and will be discouraged wherever possible through planning controls. Public services and utility signage will be minimised in line with the Council's streetscape design guidance.

Traffic management

The conservation areas accommodate heavy traffic, but, where possible, measures should be taken to reduce it. Where this cannot be achieved, the impact of traffic should be mitigated through the design of the public realm; including measures to give priority to pedestrians, planting, surface treatments, removal of redundant signage and unnecessary railings, in line with the Council's streetscape design guidance. Cycle Enfield and other highways schemes should be consistent with the character of the Conservation Area and could offer an opportunity to enhance the public realm through appropriate materials and detailing.

Shopfronts

There is considerable demand for retail space, both in existing buildings and at Edmonton Green shopping centre. There are numerous thriving small shops in both areas, almost without exception having standard modern frontages. The few surviving old shop-fronts are in poor condition and in the absence of rigorous enforcement, they are at high risk. There is pressure to combine existing shops to form larger units, at the expense of their old shop-fronts. Several old pub-frontages have, similarly, been lost or damaged since 2006. Replacement shop-fronts are subject to planning control and should only normally be allowed if they are in keeping with the age, scale, architectural character and appearance of the building of which they form a part. Advice on shopfront design is available on the Council website.

Boundary treatments

There are relatively few historic boundaries (hedges, railings etc.) within the area, but where they survive (e.g. All Saints' churchyard, Angel Place) they are an important aspect of the streetscape and should be retained. Boundaries should follow, and where appropriate, reinforce, historic building lines, property divisions and enclosures such as forecourts and gardens.

Parking

Conversion of gardens and enclosed forecourts to parking areas will normally be resisted. Design guidance on improvement to existing parking provision will be included in the Enfield Design Guide

Open spaces

Open spaces (within and adjacent to the Conservation Areas) including public parks, open space within social housing developments, private gardens, All Saints' Churchyard and Edmonton Green are of great importance in the townscape. They mitigate the impact of traffic, provide social and amenity spaces and the setting to buildings. They have significant potential for enhancement. The open space on the west side of Fore Street, north of Bridge Road, the area on the

corner of Church Street and Victoria Road, and Pymmes Brook (currently confined in an ugly concrete channel) are priorities for action.

Trees and planting

Trees planted in Fore Street have helped to recover the loss of enclosure that followed post-war redevelopment and mitigate the impact of traffic. Such initiatives will be encouraged in the Conservation Areas.

Proposals for listing/local listing

196 and 198 Fore Street are landmark buildings and should be considered for inclusion in the local list. The Phoenix PH and 134 are also of sufficient quality to merit consideration. Other buildings now proposed for exclusion from the Conservation Area and which form part of its setting may be worthy of inclusion and further investigation to ensure that they have the appropriate level of recognition. These include nos. 169-171, 134 and 170-2 Fore St.

Article 4 Direction

As stated in 2009: "There are only a few single family dwelling houses in the area - nos. 26, 28, 39-45 Church Street, plus a small number of modern buildings whose contribution to the character or appearance of the Conservation Area is neutral, or negative. The withdrawal of permitted development rights in respect of the six houses which make a positive contribution by means of an Article 4 Direction could only realistically be justified in the context of enforcement of a policy to control changes to commercial property and grant aid to reverse many of the existing harmful changes, as set out above. For that reason, it would be premature to make any specific recommendations for the making of an Article 4 Direction at this stage. Nevertheless, should future monitoring reveal that it would be beneficial to make such a Direction the Council will take the necessary steps." The situation has not changed.

Monitoring change

The 2009 CAMP emphasised that the essential complement to the designation was "diligent monitoring and, if necessary, planning enforcement action", particularly with regards to "incremental changes" including "satellite dishes... uPVC windows... poor quality... shop-fronts... and overly large internally illuminated signage.". There is opportunity to improve and do this more rigorously. However, before introducing a rigorous enforcement regime, it is vital that a programme of community engagement be undertaken in the area, and an area-specific local consultative group established. This would play a key part in monitoring change and articulating the community's priorities for the historic built environment. The local group would:

- Survey, review and monitor works and development, with regard to the heritage significance of the area as set out in the appraisal (a programme for undertaking these tasks will be agreed annually with the Council's Heritage Officer.)
- Review and monitor the design quality of proposals for which planning permission is sought

- Review appeal decisions
- Review the maintenance and safeguarding of highways, trees and greenery

It is recognised, however, that establishing such a group may take time. As an interim measure, the Borough's Conservation Advisory Group could monitor both enforcement initiatives and all planning applications/decisions affecting the conservation area.