

Hadley Wood Neighbourhood Planning Forum
Representation to Regulation 19 Enfield Local Plan

Attachment 3

Heritage Appraisal

Heritage Appraisal: Regulation 19 Consultation Land Between Camlet Way and Crescent West, Hadley Wood

May 2024

Project Number: 21.60 Land Between Camlet Way and Crescent West, Hadley Wood_Regulation 19 Consultation

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1.0 Introduction

- 1.1. This Heritage Appraisal has been prepared to inform ongoing representations to the Enfield Local Plan Representation on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum. It was originally prepared to support a response to the Regulation 18 'Enfield Local Plan: Main issues and preferred approaches' consultation in September 2021. The Council has recently published the Regulation 19 Local Plan documents for consultation and this appraisal has been updated accordingly.
- 1.2. The Regulation 19 submission maintains the proposed allocation of land between Camlet Way and Crescent West for residential development with a proposed capacity of 160 homes. The proposed site allocation reference has been updated to SA RUR.02. The allocation boundary is provided below (Fig. 1).



Fig. 1. Site location, extract from Appendix C 'Enfield Draft Local Plan Regulation 19' March 2024

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- 1.3. The site is located to the north of Camlet Way and Crescent West, immediately adjacent to the Monken Hadley Conservation Area (London Borough of Barnet) to the west and Hadley Wood Conservation Area to the east. Part of the site is within the Hadley Wood Conservation Area boundary. Other heritage assets are located within the wider area, including three listed buildings adjacent to the site on Camlet Way (Fig. 5).
- 1.4. The National Planning Policy Framework (NPPF) (2023) sets out clear guidance for plan-making with reference to the historic environment. Paragraph 196 guides, *inter alia*, that plans should set out a positive strategy for the conservation of the historic environment that should take account of the desirability of sustaining and enhancing the significance of heritage assets. The purpose of this report is to consider whether the allocation of this site is appropriate with reference to the built historic environment constraints in light of the national plan-making guidance in the NPPF.
- 1.5. This report has been prepared by JB Heritage Consulting Ltd. The author is a specialist heritage planning consultant with over ten years' professional experience in the heritage sector. She has been a full member

of the Institute of Historic Building Conservation (IHBC) since 2014 and is a chartered member of the Royal Town Planning Institute.

2.0 Methodology

- 2.1. The NPPF guides that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. This strategy should take into account: the desirability of sustaining and enhancing the significance of heritage assets; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place (paragraph 196).
- 2.2. To guide the process of allocating sites for development, Historic England has published a methodology as set out in Advice Note 3 'The Historic Environment and Site Allocations in Local Plans' (2015) (hereafter Advice Note 3). The site selection methodology sets out a five-step process as follows:
- STEP 1 Identify which heritage assets are affected by the potential site allocation
 - STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s)
 - STEP 3 Identify what impact the allocation might have on that significance
 - STEP 4 Consider maximising enhancements and avoiding harm
 - STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness
- 2.3. This appraisal will set out an assessment using this five-step process to test the appropriateness of the site for housing allocation.
- 2.4. The assessment of significance and the contribution made by the setting of heritage assets required under Step 2 is undertaken with reference to the guidance provided in Historic England's guidance 'Historic Environment Good Practice in Planning Note 3: The Setting of Heritage Assets' (Second Edition) (2017). It has been informed by desk-top research including a review of the historic map evidence, together with fieldwork undertaken in overcast conditions on 12 August 2021.

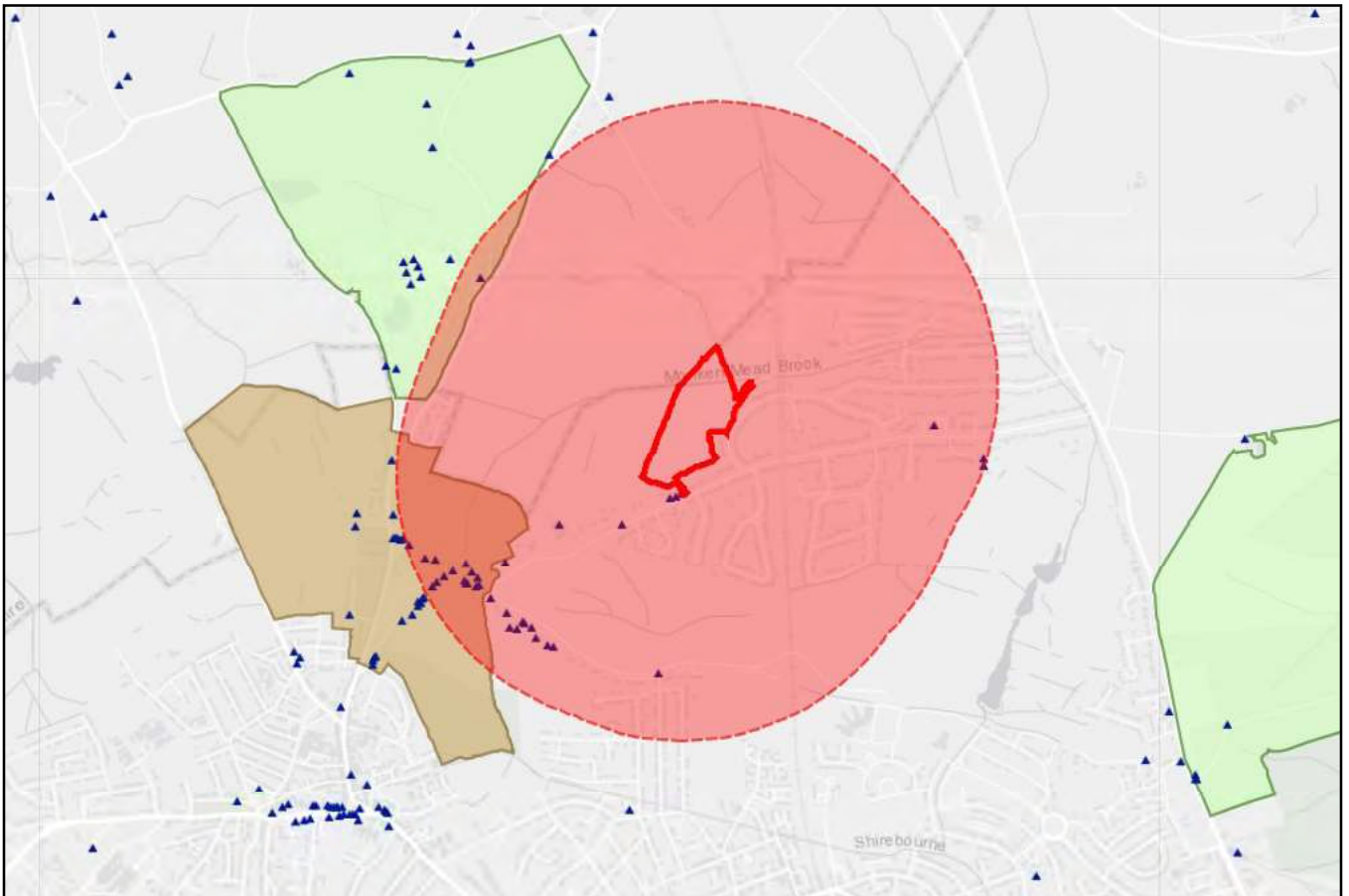


Fig. 2. NHLE entries within approximately 1km of the site, from 'Search the List- Map Search', Historic England website

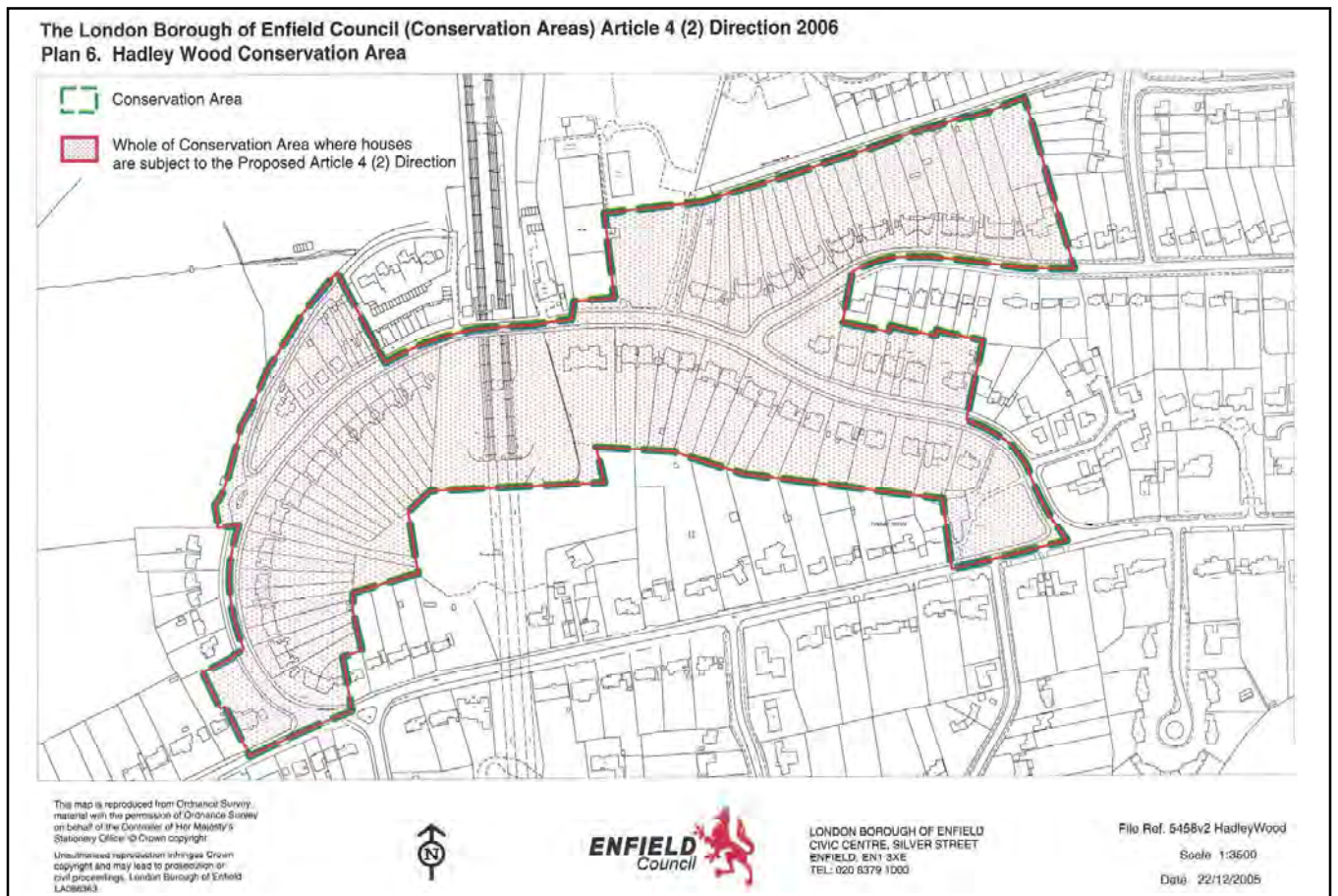


Fig. 3. Hadley Wood Conservation Area Boundary, London Borough of Enfield

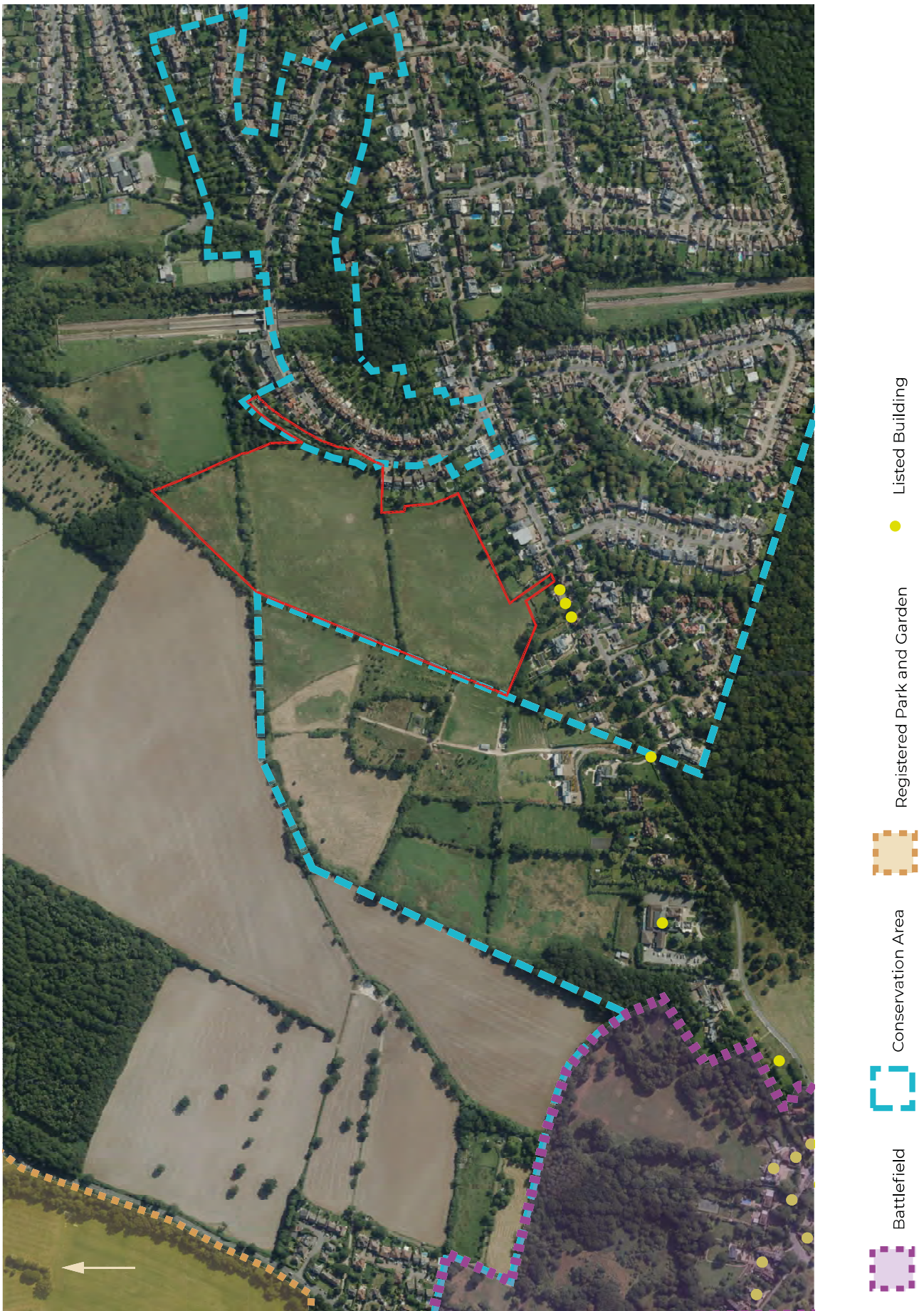


Fig. 5. Designated Heritage Assets, boundaries and locations approximated. Imagery (c) Getmapping plc (August 2019)

3.0 Step 1: Heritage Constraints

3.1. 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 decision, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

3.2. Heritage assets subject to this assessment include:

- Scheduled monuments
- Grade I, II* and II listed buildings
- World heritage sites
- Conservation areas
- Registered parks and gardens
- Battlefields
- Wreck sites
- Non-designated heritage assets

Designated heritage assets

3.3. Designated heritage assets as defined in Annex 2 of the NPPF include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields and conservation areas. Designated heritage assets within the study area have been identified using the online map function on the National Heritage List for England (NHLE) website and conservation area maps for the London Borough of Enfield and the London Borough of Barnet, the boundary of which is adjacent to the site.

3.4. Within c1km of the site are approximately 38 entries on the NHLE (excluding conservation areas and non-designated heritage assets). This includes three Grade II* listed buildings (Hadley Hurst, Parish Church of St Mary the Virgin and St Martha's Convent [the Mount House] with attached stable block), a Grade II Registered Park and Garden (Wrotham Park) and a Registered Battlefield (Battle of Barnet 1471) (Fig. 2).

3.5. The site borders two conservation areas: the Hadley Wood Conservation Area in the London Borough of Enfield, and the Monken Hadley Conservation Area in the London Borough of Barnet (Figs. 3 and 4). Part of the site is located within the boundary of the Hadley Wood Conservation Area.

3.6. Immediately adjacent to the site on Camlet Way is a cluster of three listed buildings:

- Number 83 and attached wall, gatepier and gate (Grade II), NHLE 1079464
- Number 87 and attached wall, gatepier and gate (Grade II), NHLE 1241164
- Pegasus (Grade II) NHLE 1358748

3.7. These designated heritage assets have been plotted on a satellite view at Figure 5 which demonstrates that the site is immediately adjacent and sandwiched between two conservation areas, with a small part of the site physically located within the Hadley Wood Conservation Area, and with three listed buildings on Camlet Way adjacent to its southern boundary.

Non-designated heritage assets

3.8. Non-designated heritage assets are defined in paragraph 39 of the historic environment chapter of the Planning Practice Guidance (PPG, 2019) as:

buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions... Only a minority have enough heritage significance to merit identification as non-designated heritage assets.

3.9. There are no immediately adjacent locally listed assets within the London Borough of Enfield.

3.10. There are no immediately adjacent locally listed assets within the London Borough of Barnet.

3.11. The scope of this report does not include the below-ground archaeological potential of the site. For completeness, the site is located within Archaeological Priority Area APA2: Enfield Chase and Camlet Moat.

4.0 Step 2: Heritage Significance

Introduction

- 4.1. Determining significance is a professional judgement taking into account the designation status, desk-top research and fieldwork. The assessment should seek to understand the nature, extent and level of significance, and should be proportionate to the relative importance of the asset.¹ The significance of a heritage asset is the sum of its archaeological, architectural, artistic and historic interest as defined in Annex 2 of the NPPF. The Planning Policy Guidance (PPG) provides an interpretation for the heritage interests as follows (Historic Environment Chapter, paragraph 6):

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.

- 4.2. Significance derives not only from the heritage interests of the asset itself, but also from the contribution made by its setting. The setting of a heritage asset is defined in Annex 2 of the NPPF as:

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

- 4.3. The setting assessment has been informed by the assessment steps provided in Historic England's 'Good Practice Advice Note 3: The Setting of Heritage Assets' (Second Edition) (2017) (hereafter GPA3). This recommends a staged approach to taking decisions on setting as follows:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

¹ Historic England, 'Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2' (2015) p. 2.

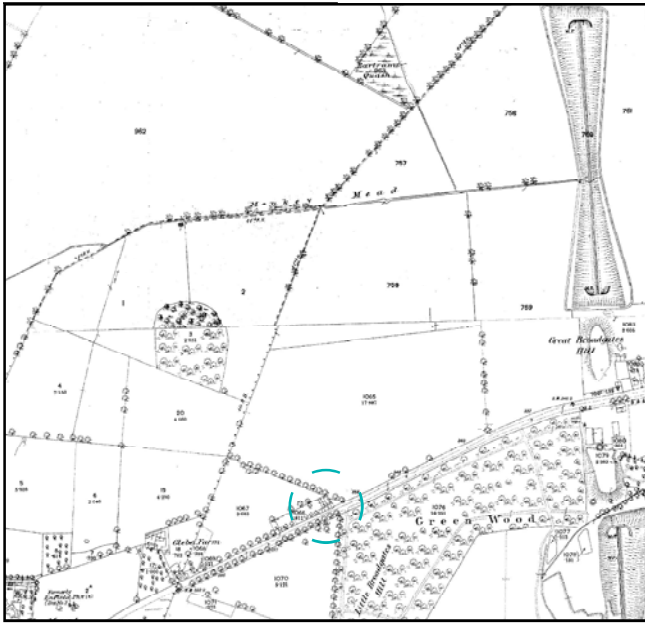


Fig. 6. 1866-78 Ordnance Survey

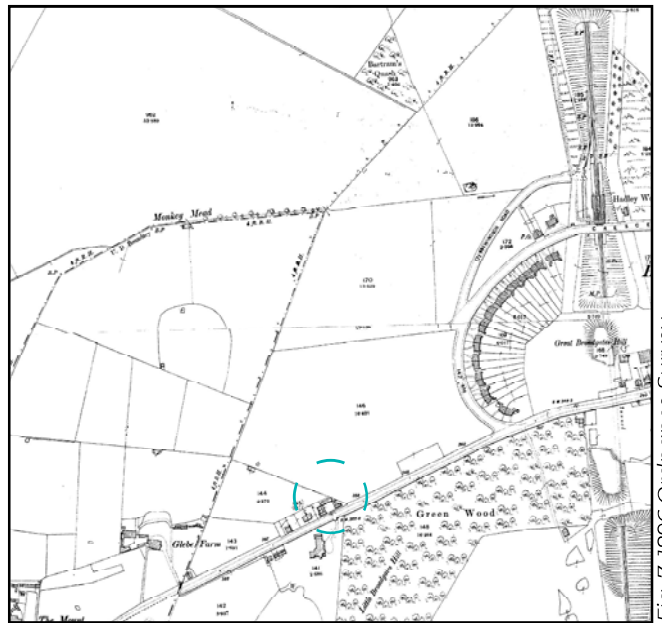


Fig. 7. 1896 Ordnance Survey



Fig. 8. 1898 Ordnance Survey

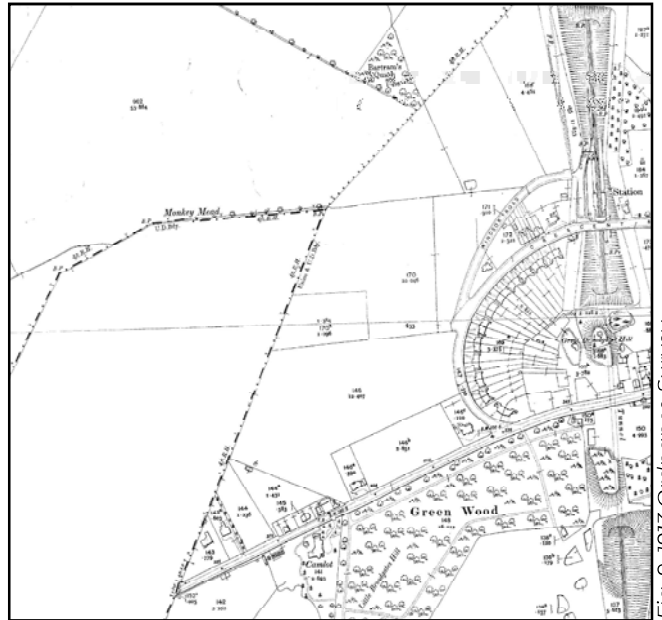


Fig. 9. 1913 Ordnance Survey



Fig. 10. 1935 Ordnance Survey



Fig. 11. 1966-71 Ordnance Survey

Step 5: Make and document the decision and monitor outcomes

Background: A Brief History of the Site and Surrounding Area

- 4.4. The three fields that form the site have been owned by the Sovereign since 1399, and by Norman Barons and Saxon Lords of the Manor before that. The hedge along the north-west edge of the site marked the boundary between the Saxon Manors of Enfield and South Mimms and between the now ceremonial counties of Middlesex and Hertfordshire since the 9th century.
- 4.5. The Battle of Barnet in 1471 took place in the nearby area; the registered battlefield is located to the west of the site but like many contemporary battles the exact location of the main action has not been accurately identified. Significant archaeological finds including lead roundshot have been recovered from the wider area.
- 4.6. By the Act of Disenchantment in 1777, George III divided his entitlement to Enfield Chase into plots for sale as agricultural leases. The parish of Monken Hadley resisted enclosure and has retained Monken Hadley Common as community space. In 1885, the Duchy converted the agricultural leases around the new railway station, in what became Hadley Wood, into building leases but retained these three fields as rough pasture, a peculiar relic of the historic chase.²
- 4.7. Prior to the 19th century, the north-western part of Enfield was thinly populated and predominantly rural.³ The Beech Hill Park estate had developed from the late 18th century to the east of what is now Hadley Wood, on land that was formerly part of the royal deer park at Enfield Chase.
- 4.8. Camlet Way was at this time mostly undeveloped, with the notable exception of a series of terraced cottages in the location of the listed cottages now numbered as Nos. 83, 87 and 89-91. As recorded on the 1866-78 Ordnance Survey (OS plan) (Fig. 6), these stood to the north of the road surrounded by open land to all aspects, with Glebe Farm to the west.
- 4.9. Since 1850, the 1866-78 OS plan shows that the railway line had tunnelled through Hadley Wood but had not catalysed development. Later in the 19th century, the then tenant of Beech Hill Park, a Mr Charles Jack, recognising the potential of the estate began negotiations with the Great Northern Railway to establish a station. This was constructed in 1885 and Jack was able to deliver his aspirations for an upmarket, prestigious new suburb. After his death in 1886, the development was continued under the management of a trust. This development was restricted to the immediate land around the station, reinforcing the exclusivity of the area and thereby attracting a more wealthy elite.⁴
- 4.10. The 1896 and 1898 OS plans (Figs. 7 and 8) show that by the end of the 19th century, much of the built form of Crescent West was in place. Camlet Way, however, remained undeveloped. This is with the notable exception of the cottages on the northern side of the road which were redeveloped in the intervening period between the survey of the 1866-78 OS plan and the 1896 OS plan. This aligns with the 1878 date given in the list entries.
- 4.11. Development continued over the first decades of the 20th century such that by the outbreak of the Second World War, Camlet Way was characterised by detached houses along its length

² Paragraph 4.4-4.6 provided by local historian.

³ A P Baggs, Diane K Bolton, Eileen P Scarff and G C Tyack, 'Enfield: Growth before 1850', in *A History of the County of Middlesex: Volume 5, Hendon, Kingsbury, Great Stanmore, Little Stanmore, Edmonton Enfield, Monken Hadley, South Mimms, Tottenham*, ed. T F T Baker and R B Pugh (London, 1976), pp. 212-218. British History Online <http://www.british-history.ac.uk/vch/middx/vol5/pp212-218> [accessed 27 August 2021].

⁴ Drury McPherson Partnership, 'Hadley Wood Conservation Area Character Appraisal' (2016), pp. 10-11.



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Fig.12. Townscape Analysis, Extract from CACA, Fig. 4, Drury McPherson Partnership on behalf of London Borough of Enfield



Fig. 13. Key view from Crescent West



Fig. 14. Key view as seen from top floor of No. 59 Crescent West

(Fig. 10). This was ribbon development, encroaching only marginally into the open field parcels that had survived along its northern side.

4.12. By the 1960s, some additional development had taken place on the western side of Crescent West, but leaving a gap in the built form between it and Bartrams Lane which survives today and creates a direct link from the conservation area to the rural setting beyond (Fig. 11).

4.13. The draft allocation site is recorded in these early OS plans as a series of field parcels. This

remains broadly consistent throughout the series of OS plans, providing evidence that the field boundaries surviving on the site today are a historic landscape feature.

Statement of Significance

Hadley Wood Conservation Area

4.14. Hadley Wood was designated as a conservation area in 1989. The most recent Conservation Area Character Appraisal (CACA) was approved in 2015 and amended in 2016.

4.15. The CACA summarises the special interest of the conservation area as follows (paragraph 3.1.1):

- *The historic significance of the area in the development of the Borough of Enfield* – Hadley Wood provides physical evidence of the transformation of Enfield from a largely rural area to a suburban one in the late 19th and early 20th centuries. It is also of interest in itself as an example of an exclusive, high-status development.
- *The original vision of Charles Jack* – Jack’s vision of a prestigious, leafy suburb, consisting of high-quality, well-built properties set around a new station, survives largely intact.
- *Street greenery* – The abundance of street trees and the well-planted front gardens of many properties give the area a pleasant, green and leafy atmosphere, which is enhanced by the informal treatment of boundaries.
- *The spacious feel of the area* – This is attributable to the wide roads with open sky above, a set-back building line and generous front gardens.
- *The discipline provided by the planned layout of the area* – Despite the significant amounts of greenery and informal architectural style of most of the buildings, a clearly conceived layout is evident in the regular building line and relatively consistent size and height of the houses, which provides the area with an overall sense of order and gentle discipline.
- *The architectural style of the buildings* – The consistent architectural style within each of the principal roads gives a strong sense of cohesion. At the same time, subtle variations in detailing and massing add visual interest to the area.
- *The design quality of the buildings* – The properties are generally carefully designed and well built, with interesting massing and handsome, well proportioned façades. Strong and lively rhythms are set up by the repetitive use of features such as bays and gables.
- *The quality of architectural detailing and materials* – Most of the properties, and particularly their joinery, are detailed to a very high standard, and they are built of good quality materials that significantly enhance their appearance.

4.16. The CACA makes specific reference to the relationship that the conservation area shares with its wider rural surroundings. For example, at paragraph 2.6.1, it describes the character as follows:

Initial impressions of the area are of spaciousness and informality, created by the gently winding roads, variety of house types and the ever-present greenery. This consists of a variety of mature street and garden trees and patches of open land punctuating the housing, with occasional views to the open countryside, giving the area a pleasant, leafy ambience. Generous roads and pavements complement the feeling of spaciousness and the lack of traffic and the small number of pedestrians lend the area a quiet, almost serene, atmosphere.

- 4.17. The relationship that Crescent West shares with the open land to the northwest of the conservation area (the site) is specifically mentioned at paragraph 2.5.2, which states:

The uniform nature of the streetscape is interrupted in three places. Most significant is the railway cutting and a parade of modern shops at the junction of Crescents East and West, which effectively divide the Conservation Area into two. More attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country with views out to the northwest of hills and woods, and at the junction of Crescent East with Camlet Way, where dwellings are replaced by the generous grounds and mature trees surrounding St Paul's Church. (emphasis added)

- 4.18. This is reflected further on the townscape analysis map which identifies the view from Crescent West looking northwest across to the site as a key view (Figs. 12-14).
- 4.19. The character of the site therefore as open countryside makes an important contribution to the significance of the conservation area by virtue of reinforcing the character of this planned development within a rural setting and contributing to its sense of green leafiness.

Monken Hadley Conservation Area

- 4.20. The Monken Hadley Conservation Area Character Appraisal Statement (CACAS) was adopted in January 2007 and sets out an appraisal of the special architectural and historic interest of the conservation area.
- 4.21. Section 4 sets out an appraisal of prevailing uses. It states that '*Monken Hadley is still very green and leafy in character and remains at a low built density. Its special character stems from development in the 18th and 19th centuries*' (page 12). It goes on to identify that '*Over half the Conservation Area is open fields and recreational land, which is also covered by the designation of Green Belt.*'
- 4.22. Section 5.1.6 appraises trees and woodland. It notes that: '*The whole Conservation Area was historically rural with built development being introduced mainly as residences for the Georgians and Victorians. Later Green Belt policy has also helped to preserve the agricultural landscapes.*'
- 4.23. Whilst the CACAS also makes reference to other attributes that contribute to the special architectural and historic interest of the conservation area, it is clear from this analysis that part of its significance is derived from the vestiges of open space and agricultural land.
- 4.24. The CACAS goes on to identify a series of character areas; the site abuts Area Six – Camlet Way. It describes the area immediately adjacent to the western boundary of the site as follows:

The land to the north of the properties in Camlet Way and area five is almost completely undeveloped agricultural land, included in the Green Belt. There are clear field boundaries seen in area six to the northern-most tip of the Conservation Area. Rectory Farm (which is to the rear of the Convent school) has become derelict and indeed at the time of writing contains a series of dilapidated sheds and out buildings. An assessment of the landscape around the farm has shown that this is historic, characterised by ponds and small fields. The field boundaries are long established, as evidenced by hedgerows and hedgerow oaks. It is likely that the field patterns reflect early enclosure which makes them of considerable historical significance. There are also extensive areas of Tree Preservation Orders around Rectory Farm.



Fig. 15. View northwest from 79 Camlet Way towards Monken Hadley Conservation Area boundary



Fig. 16. View southwest towards Monken Hadley from public footpath to west of railway line



Fig. 17. Nos. 83, 87 and Pegasus, Camlet Way

4.25. The proposed allocation site immediately adjoins the area of rural open land that forms part of the character of Area Six. The character of the site shares many of the same attributes as the land within the conservation area, with historic field boundaries and having the character of pastoral grazing land. Its undeveloped, rural character reinforces the rural character of the land within the conservation area, and can only be considered to be a positive element of the setting that contributes to an understanding and appreciation of Area Six of the Monken Hadley Conservation Area (Figs. 15-16).

- **Number 83 and attached wall, gatepier and gate (Grade II), NHLE 1079464**
- **Number 87 and attached wall, gatepier and gate (Grade II), NHLE 1241164**
- **Pegasus (Nos. 89 and 91) (Grade II) NHLE 1358748**

4.26. These are Grade II listed buildings and therefore in general terms are of national special architectural and historic interest (Fig. 17).

4.27. No. 83 and attached wall, gatepier and gate was listed in 1991. The list entry reads as follows:

Former estate cottage, with attached wall, gatepier and gate. Probably 1878, as Nos 89-91 (qv). Brownish brick in English bond; 1st floor tile-hung, with decorative bands of fishscale tile; decorative timber-framing with plastered infill to gables. Plain tile roof with crested ridge tiles and gable finials. Ribbed brick chimneys with deep, stepped caps. 2 storeys, 3 bays. In Vernacular Revival Style, having chamfered plinth; stepped, dentilled, 1st-floor band; board doors with small-pane glazing at top; small-pane wooden casement windows, those on ground floor with segmental brick arches and offset tile sills. Projecting, gabled, central bay,



Fig. 18. View from the rear of No. 85 Camlet Way adjacent to Nos. 83 and 87 across the proposed allocation site

corbelled on 1st floor, has steps up to off-centre internal porch which has 4-centred arch with stone imposts. Windows of 3,2,3 lights to ground floor; 2,3,1 lights above. External stack at left end; ridge stack between right hand bays. Wall attached to front left corner, approx 4.5 metres long and 2.5 metres high, has chamfered ashlar coping and terminates in octagonal pier which has moulded ashlar offsets and cap supporting decorative iron lantern; attached to pier is leaf of decorative iron gate. Left return of cottage: decorative ashlar plaque to stack which is flanked by 1- light windows. Interior not inspected. The cottage served the nearby Broadgates.

4.28. No. 87 and attached wall, gatepier and gate was listed in 1991. The list entry reads as follows:

Former estate cottage, with attached wall, gatepier and gate. Probably 1878, as Nos 89-91 (qv). Brownish brick in English bond; 1st floor tile hung, with elaborate bands of fishscale tile; decorative timber- framing with plastered infill to gables. Plain tile roof with crested ridge tiles and gable finials. Ribbed brick chimneys with deep stepped caps. 2 storeys, 3 bays. In Vernacular Revival Style, having chamfered plinth; stepped dentilled 1st floor band; board doors with small-pane glazing at top; small-pane wooden casement windows, those on ground floor with segmental brick arches and offset tile sills, projecting, gabled, central bay, corbelled on 1st floor, has steps up to off- centre internal porch, which has 4-centred each with stone imposts. Windows of 3,2,3 lights to ground floor; 1,3,2 lights above. External stack at right end; ridge stack between left-hand bays. Wall attached to front right corner, approx 4.5 metres long and 2.5 metres high, has chamfered ashlar coping and terminates in octagonal pier which has moulded ashlar offsets and cap supporting decorative iron lantern; attached

to pier is a leaf of decorative iron gate. Right return of cottage: decorative ashlar plaque to stack which is flanked by 1-light windows. Interior not inspected. The cottage served the nearby Broadgates.

4.29. Pegasus (Nos. 89 and 91) was listed in 1991. The list entry reads as follows:

Pair of former estate cottages. Dated 1878. Brownish brick in English bond; 1st floor tile hung with decorative bands of fishscale tile; decorative timber-framing with plastered infill to gables. Plain tile roof with crested ridge tiles. Ribbed brick chimneys with deep, stepped, caps. 2 storeys, No 89 with attic; 5 irregular bays. in Vernacular Revival Style, having chamfered plinth; stepped dentilled 1st-floor band; board doors; small-pane wooden casement windows of 2,3 or 4 lights, those on 1st floor' of recessed bays shorter. Bays 2 and 4 projecting and gabled, the former' with decorative timber-framing and datestone to 1st floor; the latter broader and with transomed attic window framed by gable. porch to right bay has mullioned window of 5 round-arched lights and entrance to right return (to No 89); C20 timber-framed 1st floor addition. 2-span roof with end stacks and 2 in line near centre. Left return: chimney on right has window in base and flanking 1-light windows on 1st floor. On left, segmental archway to internal porch with board door and 3-pane side-window. Interior of No 89: board doors; delft tiles and plain surrounded to living-room fireplace; quarry tile floor to kitchen. The cottages served the nearby Broadgates.

4.30. The significance of these listed buildings is derived principally from their architectural and historic interest as handsome examples of domestic architecture in the Vernacular Revival Style that was fashionable towards the end of the 19th century. This is augmented further by their historic interest as cottages serving 'Camlot' house on the southern side of Camlet Way, later renamed as 'Broadgates'.

4.31. These cottages form a clear group through their spatial arrangement as well as their shared architectural detailing. They were one of the first group of houses to be constructed on this section of Camlet Way, being originally surrounded by open land on all sides. Over the course of the 20th century, Camlet Way has become lined with detached houses which now creates a suburban character to this aspect of their setting.

4.32. To the rear, their historic setting survives. The properties give way to open land comprising the draft allocation site with further rolling countryside beyond. The open character of this land is a historic survival of their formerly rural location as is common of estate cottages and complements the Vernacular Revival architectural design, reinforcing their cottage-like character.

4.33. The rural attributes of the site therefore make a positive contribution to an understanding and appreciation of the significance of these heritage assets.

5.0 Step 3: Impact Assessment

- 5.1. This section sets out an assessment of the potential heritage impacts that would likely result from the development of the site for housing with a yield of 160 units.

Hadley Wood Conservation Area

- 5.2. The Council's own conservation area appraisal (2016) highlights the importance of the green, rural character of the site to the setting of the conservation area. The site is specifically referenced in the supporting text as well as the townscape analysis map which identifies the view outwards from the conservation area boundary from Crescent West across the site as a key view. It must therefore be considered to contribute positively to the setting of the conservation area.
- 5.3. The proposed development of the site for a quantum of development of the scale proposed would not sustain the rural character of the site, including the rural outlook identified to be of importance to the conservation area in the CACA. It would replace the grazing land character with one of suburban development, giving rise to a fundamental change in character of a substantial proportion of the last remaining area of open land immediately abutting the conservation area.
- 5.4. This change would neither sustain nor enhance the special interest of the Hadley Wood Conservation Area. It would erode the green outlook in these views outwards from Crescent West as well as the remaining evidence of the 19th century transformation of Hadley Wood from rural land to prestigious suburb.
- 5.5. A report was prepared in 2016 by Amec Foster Wheeler 'Land at Camlet Way, Hadley Wood: Further supporting information' which was submitted to support the inclusion of the site at various Call for Sites stages. Appendix A sets out a Heritage Assessment. At section 1.3, contrary to the Council's assessment in the CACA, it concludes that the site does not make a positive contribution to the significance of the conservation area, with potential to open up and enhance views into the site. In drawing this conclusion, the assessment does not appear to give weight to the importance of the rural, undeveloped character of the land, nor by extension the inherent impact of the appearance of built form on this rural character in any opened up views despite the recommended mitigation.
- 5.6. Contrary to the aforementioned report, rather than delivering an enhancement, the development of this site for housing would likely give rise to a considerable degree of harm to the special architectural and historic interest of the conservation area and its setting that would neither preserve nor enhance its character or appearance.

Monken Hadley Conservation Area

- 5.7. A significant proportion of the Monken Hadley Conservation Area is open, rural land and has been determined by the London Borough of Barnet to contribute to its special architectural and historic interest. The site shares these same attributes and contributes positively to an understanding and appreciation of the green, rural character of the land within Area Six. In its current form therefore, it must be considered a positive attribute of its setting.
- 5.8. The Council's initial assessment (set out at 5.17) does not acknowledge the site's adjacency to the Monken Hadley Conservation Area. Nor is this conservation area assessed in Appendix A of the Amec Foster Wheeler report. This is not in line with the established methodology at Step

1 of Advice Note 3. As a result, there is no evidence to demonstrate how the impact on this designated heritage asset has been taken into account.

5.9. This conservation area lies outside of the London Borough of Enfield's administrative area, being designated by and located within the London Borough of Barnet. It is nevertheless a designated heritage asset protected in statute by the Planning (Listed Buildings and Conservation Areas) Act 1990 and local and national planning policy. The potential impact of development on this site on the significance of this heritage asset is therefore material at the plan-making and decision-making stage and should not be overlooked on the basis of its location in a neighbouring borough.

5.10. The erosion of its rural character in place of one of built form would neither sustain nor enhance a positive attribute of the setting of the conservation area, but would result in a degree of harm that must be taken into account in the interests of sound plan-making.

- **Number 83 and attached wall, gatepier and gate (Grade II), NHLE 1079464**
- **Number 87 and attached wall, gatepier and gate (Grade II), NHLE 1241164**
- **Pegasus (Nos. 89 and 91) (Grade II) NHLE 1358748**

5.11. The 2016 report by Amec Foster Wheeler considers the setting of the listed buildings at Section 1.2 of Appendix A. It identifies that the:

majority [of the] site is not visible from the public realm in a way which adds to the significance of the listed buildings. It is also apparent that the listed buildings sit on the ridge line, and the proposal site [to] the rear drops away so it is not visible from the public realm. Therefore the site, in its present form, does not contribute to the significance of the listed buildings.

5.12. For the avoidance of doubt, the guidance note on setting published by Historic England, 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets' Second Edition (2017) makes clear that the availability of accessible views does not depend on there being public access (page 2):

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

5.13. The fact therefore that the site can only be glimpsed from Camlet Way in conjunction with the listed buildings is not a determinant in whether or not it contributes to their significance.

5.14. Moreover, the assessment of impact at Section 1.3 suggests mitigation measures to reduce the impact of the proposed development, including additional planting along their rear boundaries and lower densities in the southern part of the site. Such measures would only be necessary if the introduction of built form would be harmful, inferring by extension that the current, undeveloped nature of the site does in fact make some contribution to an experience of these assets.

5.15. The assessment also finds that the spur of land immediately to the east of the listed buildings adjoining Camlet Way makes a negative contribution to their setting. This is disputed, the undeveloped nature of this tract of land acts as a buffer between the listed group and the later neighbouring development to the east. At Section 1.3 it goes on to state that the management and maintenance of this access for walking and cycling will deliver improvements to the setting. This is also disputed given that this is likely to erode the green, undeveloped character

of the site in favour of a more suburban appearance.

- 5.16. It is concluded here that, with respect, the Amec Wheeler Foster report does not make a consistent or convincing case that development on this site would sustain the significance of these listed buildings. It is instead concluded that the open character of the site is a vestige of their once rural setting which contributes positively to their significance as estate cottages in the Vernacular Revival style. The introduction of built form of this scale would result in a degree of harm by virtue of the erosion of the rural character of the site and its replacement with one of suburban development.

London Borough of Enfield Regulation 18 stage Assessment

- 5.17. At the Regulation 18 stage, the Council undertook an initial assessment as set out at page 364 of the 'Enfield Local Plan: Main issues and preferred approaches' (June 2021) of Site SA45: Land Between Camlet Way and Crescent Way. This assessment identified the following heritage considerations:

Immediately adjacent to Hadley Wood CA. Within immediate setting of Grade II Listed Buildings. Within wider setting of numerous other heritage assets including, but not limited to: Wrotham Park Registered Park and Garden and the Battle of Barnet Registered Battlefield and non-designated heritage assets.

Amber – heritage constraints; potential to develop; usual methodology for assigning indicative density will not apply; heritage impact assessment required; mitigation required

- 5.18. As noted above, this assessment failed to identify the adjacency to the Monken Hadley Conservation Area and, by extension, to demonstrate how it has assessed the potential impact on this designated asset. The assessment does, however, nevertheless identify that the site is constrained by designated heritage assets.

- 5.19. This is supported by the assessment undertaken by LUC on behalf of the London Borough of Enfield as set out in the report 'Interim IIA findings', dated June 2021. This report is an 'Integrated Impact Assessment' (IIA) of Enfield's Regulation 18 Draft Local Plan, including a sustainability appraisal and strategic environmental assessment. The appraisal matrices for the site options are provided in Appendix B. The appraisal for Land Between Camlet Way and Crescent Way makes the following assessment with regards to the potential historic environment impact:

Site overlaps Hadley Wood Conservation Area and is within 500m of a Grade II listed building (St Martha's Convent (the Mount House) with attached Stable Block) and three Grade II listed buildings (Number 83 and attached wall, gate pier and gate, Number 87 and attached wall, gate pier and gate, and Pegasus). The site is located on the edge of Hadley Wood and its large-scale development could adversely affect the setting of these heritage assets*

London Borough of Enfield Regulation 19 stage Assessment

- 5.20. The London Borough of Enfield has published as part of the Regulation 19 consultation documents the site allocation proformas at Appendix C. Site A RUR.02: Land between Camlet Way and Crescent Way is considered at pages 511-512. This includes an accompanying concept plan showing how development might take place (Fig. 19) along with a table setting out site considerations.

- 5.21. The text flags relevant heritage constraints on page 511. This correctly states that the site is



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Fig. 19. Extract from Appendix C,
Enfield Draft Local Plan Regulation
19, March 2024

immediately adjacent to Hadley Wood Conservation Area, but fails to acknowledge that part of the site is *within its boundary*. It also fails to acknowledge that the site is located immediately adjacent to the Monkden Hadley Conservation Area.

5.22. The proforma correctly acknowledges that the site lies within the immediate setting of Grade II listed buildings, with further designated and non-designated heritage assets within the wider area. For this reason it has been rated amber.

5.23. The proforma goes on to set out a set of Design Principles but these fail to demonstrate how the heritage impacts can be adequately mitigated. The Council's own conservation area appraisal identifies a key view across the site at the point now indicatively proposed to serve as the main access (Fig. 12). This view is described in the conservation area appraisal as follows:

More attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods, (paragraph 2.5.2)

5.24. The Design Principles make no reference to this key view or how its contribution to the significance of the conservation area could be sustained through development. Indeed, the proposal to locate the principal access with active frontages along this viewing corridor would inevitably erode the special qualities of the view highlighted in the extract from the appraisal above. This would lead to direct heritage harm.

5.25. Furthermore, neither the concept plan nor the Design Principles make any provision for mitigation measures that would sustain the setting of the immediately adjacent listed

buildings; there is no mention of these listed buildings in the Design Principles. It has not been demonstrated therefore that development on this site could adequately mitigate the likely adverse impacts on the significance of these assets.

- 5.26. Whilst the Design Principles make reference to a need to consider carefully the impact on the Monken Hadley Conservation Area, there are no suggested mitigation measures that would demonstrate how any adverse impacts could be adequately ameliorated or avoided.
- 5.27. The Council's own proforma therefore fails to adequately demonstrate how the significance of immediately adjacent heritage assets can be protected were development to come forward on this site.
- 5.28. The Local Plan evidence base includes the Housing and Economic Land Availability Assessment (HELAA) (April 2023). The site is considered as COC8 Land between Camlet Way and Crescent West, Hadley, with the conclusion it is potentially deliverable. The methodology for identifying the constraints is considered to be flawed with the omission of listed buildings, conservation areas, and other designated and non-designated heritage assets from the list of constraints.

6.0 Step 4: Maximising Enhancements and Minimising Harm

- 6.1. The impact of the development of the site for 160 houses would result in the loss of the existing green, open character in favour of one of suburban built form. It is not clear from the concept plan provided in the Appendix C proforma document or the Design Principles how this suburban form would relate positively to the characteristics of the setting of the Hadley Wood Conservation Area, one of which is its peripheral location with a direct connection to the landscape beyond, or the setting of the Monken Hadley Conservation Area and listed buildings on Camlet Way.
- 6.2. Ultimately, whilst mitigation measures could potentially be incorporated into the detailed design to lessen the severity of the impact, the delivery of 160 units is likely to have a significant adverse residual impact by virtue of the fundamental loss of the undeveloped character of this part of their setting.
- 6.3. This potential impact is identified in the updated Enfield Local Plan Integrated Impact Assessment prepared by LUC for the Regulation 19 consultation (March 2024). This sustains the conclusion drawn at the Regulation 18 stage that *'large scale development could adversely affect the setting of these heritage assets'* (Appendix G, G-126). The justification states that the Council has stated that a Heritage Impact Assessment should be undertaken and mitigation provided. No such Heritage Impact Assessment has been prepared for consultation, and the mitigation measures listed in the site proforma are inadequate for the reasons as set out above.
- 6.4. Indeed it is notable that there appears to be no historic environment assessment undertaken as part of the Local Plan evidence base. The evidence base has not therefore adequately addressed statutory and non-statutory designations.

7.0 Step 5: Conclusions

7.1. Step 5 of the methodology is to test the site against the NPPF's tests for soundness. The NPPF guides that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. This strategy should take into account: the desirability of sustaining and enhancing the significance of heritage assets; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place (paragraph 196).

7.2. This is reinforced at a Greater London and local level. The London Plan (2021) sets out the spatial development strategy for Greater London. 'Policy HC1 Heritage conservation and growth' provides guidance on managing the conservation of the historic environment and growth. Criterion B guides:

Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

1) setting out a clear vision that recognises and embeds the role of heritage in place-making

2) utilising the heritage significance of a site or area in the planning and design process

3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place

4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

7.3. At the local level, Enfield Council has prepared and adopted a heritage strategy for the positive ongoing management of the historic environment within the borough: 'Making Enfield: Enfield Heritage Strategy 2019-2024'. This was adopted in 2019 and is therefore a material consideration in decision-making. It establishes a series of objectives and aims, including O10 which states:

Continue to manage the Borough's heritage and its setting as appropriate to its significance through regulatory and planning functions and develop the instrumental value of heritage in place-making.

The 'task' to achieve the objective makes clear that this includes decision-making at the strategic planning stages:

Encourage sustainable and creative decision-making to conserve and enhance historic assets and their settings through strategic planning, Development Management and regulatory services.

The output makes clear the weight to be given to heritage assets at the strategic planning stages:

Ensure that substantial weight is given to heritage assets and their settings in decision-making and strategic planning and through creative approaches to growth.

- 7.4. The Council has identified in its own assessments at the Regulation 18 and 19 stages the potential for an adverse impact on designated heritage assets, rating the site 'amber'. This is reinforced by the findings of potential harm in the assessment by LUC undertaken on behalf of the Council at both the Regulation 18 and 19 stages. In line with the Council's own adopted heritage strategy, substantial weight must be given to heritage assets and their settings at the strategic planning stage. As made clear in London Plan Policy HC1, it is important that the strategy is informed by an understanding of the heritage significance of those assets potentially affected and their settings.
- 7.5. The assessment undertaken in this report has identified the potential for an adverse impact that is unlikely to be capable of being mitigated to a degree such that it would avoid harm. On this basis, the appraisal set out above has demonstrated that the proposed development of this site would not contribute to a positive strategy for the conservation and enhancement of the historic environment. It would fail to sustain or enhance the significance of heritage assets, most likely giving rise to a series of harms impacting, at a minimum, two conservation areas and three listed buildings.
- 7.6. For the purposes of national planning policy, these are designated heritage assets. In decision-taking, the NPPF makes clear that great weight must be given to their conservation, irrespective of whether any potential harm amounts to substantial harm or less than substantial harm (paragraph 205).
- 7.7. The allocation of this site is not therefore considered to meet the NPPF's tests for soundness on historic environment grounds.

APPENDIX 1



NUMBER 83 AND ATTACHED WALL, GATEPIER AND GATE

Overview

Heritage Category:
Listed Building

Grade:
II

List Entry Number:
1079464

Date first listed:
01-Aug-1991

Statutory Address:
NUMBER 83 AND ATTACHED WALL, GATEPIER AND GATE, 83, CAMLET WAY

Map



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(https://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/362400/HLE_A4L_Grade|HLE_A3L_Grade.p

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Location

Statutory Address:

NUMBER 83 AND ATTACHED WALL, GATEPIER AND GATE, 83, CAMLET WAY

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Enfield (London Borough)

Parish:
Non Civil Parish

National Grid Reference:
TQ 25836 97772

Details

The following building shall be added:-

CAMLET WAY TQ 29 NE (North Side), Hadley Wood 19/1004 No 83 and attached wall, gatepier and gate

GV II

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

Listing NGR: TQ2583697772

Legacy

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Legacy System number:
200851

Legacy System:
LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

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NUMBER 87 AND ATTACHED WALL, GATE PIER, AND GATE

Overview

Heritage Category:
Listed Building

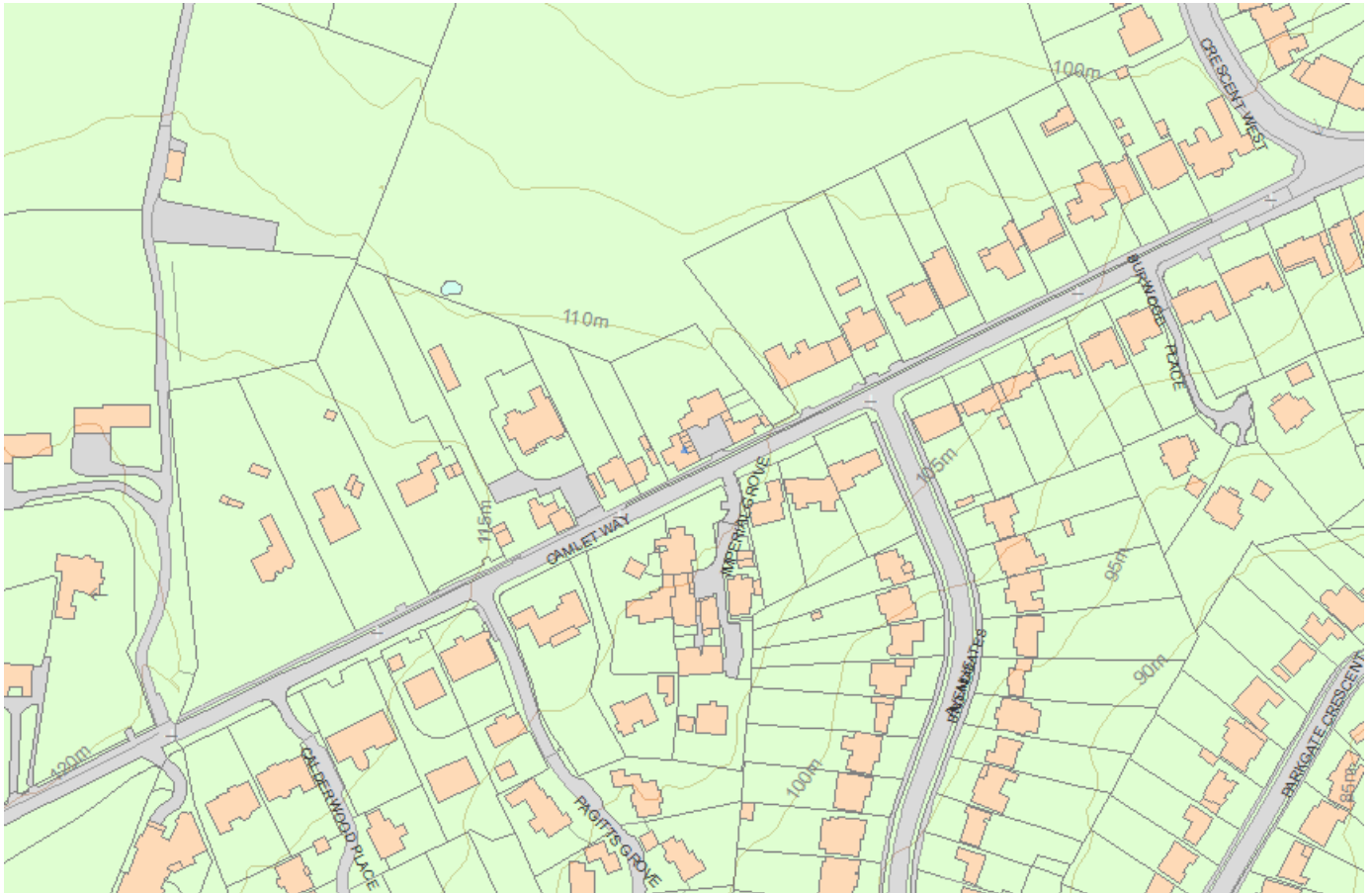
Grade:
II

List Entry Number:
1241164

Date first listed:
01-Aug-1991

Statutory Address:
NUMBER 87 AND ATTACHED WALL, GATE PIER, AND GATE, 87, CAMLET WAY

Map



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Location

Statutory Address:

NUMBER 87 AND ATTACHED WALL, GATE PIER, AND GATE, 87, CAMLET WAY

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Enfield (London Borough)

Parish:

Non Civil Parish

National Grid Reference:

TQ 25814 97763

Details

The following building shall be added:-

CAMLET WAY TQ 29 SE (North Side) Hadley Wood 19/1005 No 87 and attached wall, gatepier, and gate GV II Former estate cottage, with attached wall, gatepier and gate. Probably 1878, as Nos 89-91 (qv). Brownish brick in English bond; 1st floor tile hung, with elaborate bands of fishscale tile; decorative timber- framing with plastered infill to gables. Plain tile roof with crested ridge tiles and gable finials. Ribbed brick chimneys with deep stepped caps. 2 storeys, 3 bays. In Vernacular Revival Style, having chamfered plinth; stepped dentilled 1st floor band; board doors with small-pane glazing at top; small-pane wooden casement windows, those on ground floor with segmental brick arches and offset tile sills, projecting, gabled, central bay, corbelled on 1st floor, has steps up to off- centre internal porch, which has 4-centred each with stone imposts. Windows of 3,2,3 lights to ground floor; 1,3,2 lights above. External stack at right end; ridge stack between left-hand bays. Wall attached to front right corner, approx 4.5 metres long and. 2.5 metres high, has chamfered ashlar coping and terminates in octagonal pier which has moulded ashlar offsets and cap supporting decorative iron lantern; attached to pier is a leaf of decorative iron gate. Right return of cottage: decorative ashlar plaque to stack which is flanked by 1-light windows. Interior not inspected. The cottage served the nearby Broadgates.

Listing NGR: TQ2581497763

Legacy

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Legacy System number:

200852

Legacy System:

LBS

Legal

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End of official listing

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PEGASUS

Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1358748

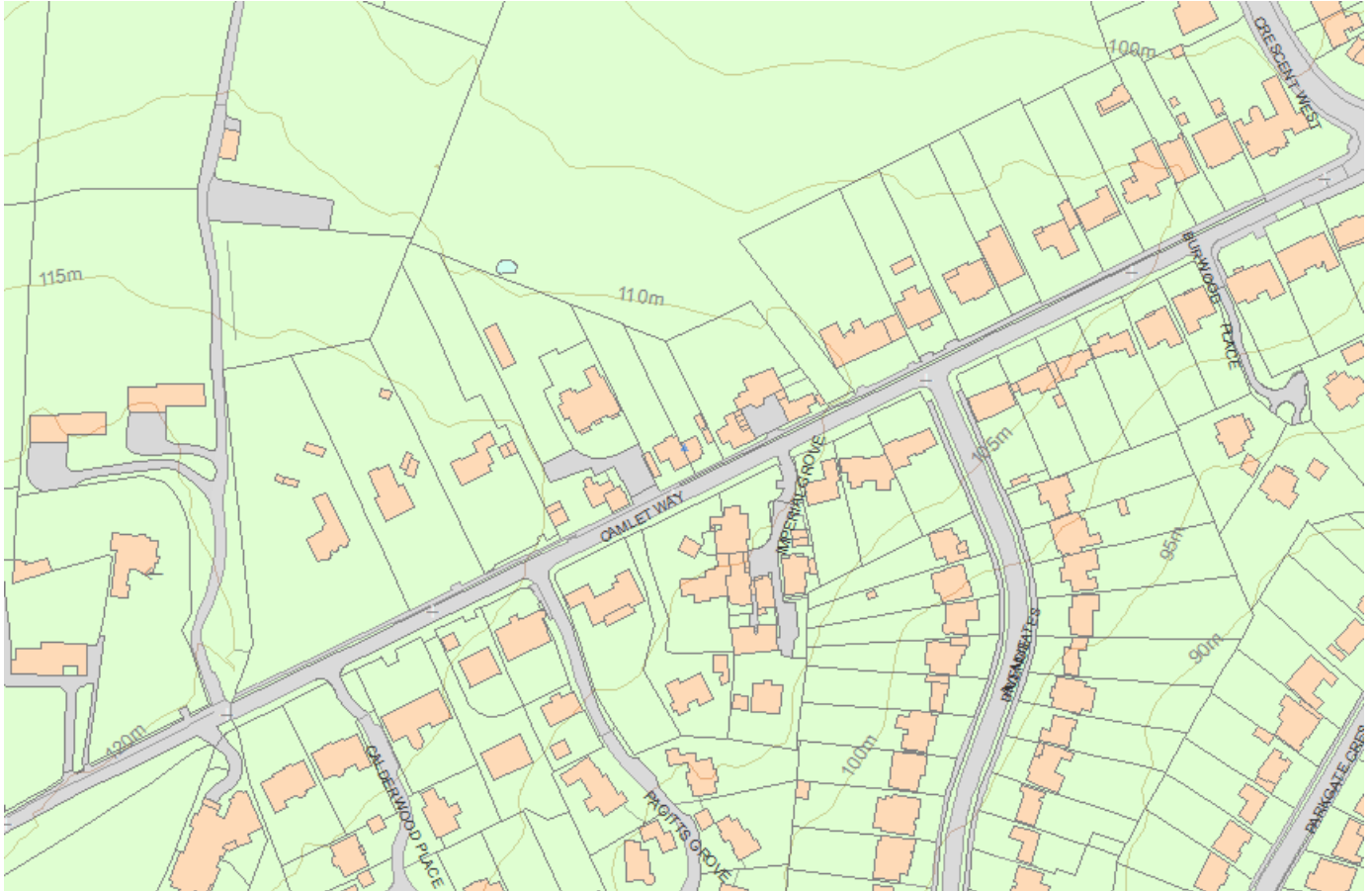
Date first listed:

01-Aug-1991

Statutory Address:

PEGASUS, 89 AND 91, CAMLET WAY

Map



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Location

Statutory Address:

PEGASUS, 89 AND 91, CAMLET WAY

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Enfield (London Borough)

Parish:
Non Civil Parish

National Grid Reference:
TQ 25791 97755

Details

The following building shall be added:-

CAMLET WAY TQ 29 NE (North Side), Hadley Wood 19/1006 Nos 89 and 91 (Pegasus)

GV II

Pair of former estate cottages. Dated 1878. Brownish brick in English bond; 1st floor tile hung with decorative bands of fishscale tile; decorative timber-framing with plastered infill to gables. Plain tile roof with crested ridge tiles. Ribbed brick chimneys with deep, stepped, caps. 2 storeys, No 89 with attic; 5 irregular bays. in Vernacular Revival Style, having chamfered plinth; stepped dentilled 1st-floor band; board doors; small-pane wooden casement windows of 2,3 or 4 lights, those on 1st floor' of recessed bays shorter. Bays 2 and 4 projecting and gabled, the former'with decorative timber-framing and datestone to 1st floor; the latter broader and with transomed attic window framed by gable. porch to right bay has mullioned window of 5 round-arched lights and entrance to right return (to No 89); C20 timber-framed 1st floor addition. 2-span roof with end stacks and 2 in line near centre. Left return: chimney on right has window in base and flanking 1-light windows on 1st floor. On left, segmental archway to internal porch with board door and 3-pane side-window. Interior of No 89: board doors; delft tiles and plain surrounded to living-room fireplace; quarry tile floor to kitchen. The cottages served the nearby Broadgates.

Listing NGR: TQ2579197755

Legacy

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Legacy System number:
200853

Legacy System:
LBS

Legal

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