

1. London Borough of Enfield
2. P. N. Riddington
3. First Statement
4. Exhibits "PNR 1" – "PNR 2"
5. Dated this 18th day of January 2006

IN THE LANDS TRIBUNAL

CLAIM NO. LP/37/2004

BETWEEN:

THE MAYOR AND BURGESSES OF
THE LONDON BOROUGH OF ENFIELD

Applicant

- and -

OBJECTORS TO MODIFICATION OF
BROOMFIELD PARK COVENANT

Objectors

WITNESS STATEMENT OF PETER NORMAN RIDDINGTON

I, Peter Norman Riddington BSc, BArch, RIBA of Donald Insall Associates Ltd, Architects and Historic Building Consultants, 19 West Eaton Place, London SW1X 8LT believe that the facts of this Witness Statement are true and understand that it may be placed before the Lands Tribunal.

Insofar as the content of this Witness Statement is within my personal knowledge, it is true and insofar as it is not within my personal knowledge, it is true to the best of my knowledge.

I WILL SAY AS FOLLOWS:

- 1.1 I am a Senior Associate of Donald Insall Associates Limited, Architects and Historic Building Consultants and I am authorised to make this witness statement on behalf of the London Borough of Enfield ("the Council"). My Curriculum Vitae is attached to this Statement and marked PNR1.

- 1.2 I am a qualified architect and Senior Associate in the firm of Donald Insall Associates Ltd with over 20 years' experience working with historic buildings including wide-ranging experience and knowledge of listing building issues.
- 1.3 I have been asked to provide any professional opinion on whether the proposals for the restoration and extension of Broomfield House are acceptable in terms of their historic setting, and as such the covenant should be modified to enable their proposed uses.
- 1.4 Based on my knowledge of the history of the house and park, it is my professional opinion, as the architect responsible for them, that the proposals are acceptable both in terms of their use and their form.
- 1.5 My proof of evidence sets out the status of the house and its setting and the history of the proposals for the building and park. It further examines Planning Policy Guidance Note 15 (Planning in the Historic Environment) 1994 (PPG 15) and describes how the proposals properly take into account the guidance in that document.
- 1.6 I make this witness statement from facts and matters within my knowledge, which are true. Where any fact or matter is not within my knowledge it is true to the best of my knowledge and belief.
- 1.7 This statement addresses the historic building and environment issues relating to the appropriateness of proposals to convert and extend Broomfield House, and adjacent out-buildings and stable yard to provide: a café; public meeting rooms; educational and display facilities; a conservatory and function room; and related car parking facilities. It is the appropriateness of the proposed commercial uses for the building which is at the heart of the case for the removal of the restrictive covenants.
- 1.8 I was the architect responsible for the preparation of the proposals to alter and extend Broomfield House and the Planning and Listed Building Consent applications which were made for these proposals in 2003. The brief for the proposals was to provide a design which would largely restore the house to provide community and refreshment facilities, and extend it to provide a room which might be employed for either functions or community uses. The proposals were prepared in the Spring of 2002.
- 1.9 In addition to this, I was the architect responsible for contract works undertaken following the last major fire at the House in 1994, and subsequently advised on three other proposals for the repair, restoration and extension of the building. These proposals included one to convert the House and Stable Yard to accommodate a restaurant for Whitbread Ltd in 1997, a scheme which was also granted listed building and planning consent.
- 1.10 Other information pertinent to the case is that: Donald Insall Associates Ltd (formerly Donald W Insall & Associates) have been involved with Broomfield

House since the original fire in 1984; I am a local resident having lived in Palmers Green since 1978 and was a frequent visitor to Broomfield House before the fire and remains a regular user of Broomfield Park.

2.0 BACKGROUND

2.1 Status of the Building Fabric and Park

- 2.1.1 Broomfield Park is included at Grade II on English Heritage's (non-statutory) list of Historic Park and Gardens. It is also Metropolitan Open Land. Broomfield House is statutorily listed Grade II* (in the top 6% of all such protected buildings) under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and is on English Heritage's Buildings at Risk register.
- 2.1.2 Interestingly, and perhaps rather uniquely, Broomfield House's listing was raised from Grade II to Grade II* after the fire of 1984, as the fire exposed the earliest 16th century elements of the house previously hidden by later fabric. The listing description is included in Appendix V.
- 2.1.3 The garden walls to the east of the Park (along Broomfield Lane) and those within the Park and the Stable Block are also included on the Statutory List at Grade II. Their listing description is also included in Appendix V. Although the Stable Block and Gazebo (or Garden House) are identified within the listings, the Greenhouse and Garden Stores buildings in the Stable Yard are not. However, as it falls within the curtilage of listed buildings, the works to the Garden Store were included within the application for Listed Building Consent, along with the works to Broomfield House and its adjacent garden walls.

2.2 The History of the Proposals for the Building and Park

- 2.2.1 Broomfield House suffered a major fire in May 1984. This in itself was a tragic enough event, but subsequent fires compounded the earlier damage and what had, at one time, seemed a fairly straightforward fire damage repair problem had, by mid 1994, become a question of survival for this important historic building and local landmark.
- 2.2.2 Following abortive attempts by the Local Authority to restore the house by introducing private developers to bring commercial uses in to the building, a Task Force of local people and politicians was set up to try to establish a way forward for the building to allow it to return to public use while ensuring its long-term viability and self-sufficiency.
- 2.2.3 The proposals were the results of that process. They were prepared with the aim to provide real community uses for the building and yet retain and restore what survived of the important historic fabric and give it long-term viability. Part of the proposals was provision for commercial uses which sought to provide viability for the building and, in effect, ensure that the non-commercial community uses were supported financially.

2.2.4 The proposals were granted planning and listed building consent, subject to confirmation by the ODPM, in October 2003.

2.3 The Proposals

2.3.1 Proposals were produced by Donald Insall Associates in preliminary form in June 2002 and were subject to public display and informal local consultation in September 2002. As a consequence, the designs were refined.

2.3.2 The designs were completed in May 2003 and planning applications made for the restoration and conversion of Broomfield House and the various works associated with these proposals. The proposals included: the restoration of Broomfield House; the conversion of Broomfield House to provide a mixture of uses including a café, public meeting rooms, educational and display facilities, with their attendant WCs, kitchen etc; the extension of Broomfield House with a new function room building linked to the house by a conservatory, with attendant WC facilities; the conversion of a garden storage building into a new caterers kitchen facility; the re-modelling of the stable yard area as a car park, with an associated traffic management scheme; re-finishing and extending of footpaths and terraced areas to provide pedestrian access and areas for outdoor café uses.

2.4 PPG15

2.4.1 Proposals for development or re-development of listed buildings and/or works in scheduled parks and gardens are subject to the guidance of 'Planning and the Historic Environment' – Planning Policy Guidance Note (PPG) 15 (1994).

2.4.2 Paragraph 3.5 of PPG 15 lays out the four key considerations when considering any application for listed building consent:

“i) the importance of the building”
Broomfield House is listed Grade II* and therefore very important.

“ii) the particular features of the building that justify its inclusion on the list”
Although depleted by fires, the home has significant architectural features and murals surviving.

“iii) the buildings setting and its contribution to the local scene”
The building's relationship with its grounds and setting are of considerable value. The house has intrinsic value as a focus of the Registered Historic Park and landscape. The Broomfield House complex is one of only two listed buildings in Palmers Green and is its oldest building. As such it makes a particularly high contribution to the local scene.

“iv) the extent to which any proposed works would bring substantial benefits for the community”
This is not relevant to this case.

2.4.3 PPG15 accepts that one key criteria in ensuring the future of historic buildings is to secure their long term economic viability and it also accepts that, in order to achieve this, sensitive alteration of historic fabric may be necessary. However, it also argues, economic viability should be balanced against the effect of any such changes on what is truly significant and interesting about the listed building/site in question. Therefore, if it can be demonstrated that the long term future of a listed building can be assured by altering its less significant fabric and/or extending it to provide accommodation to help to financially support it, this may be acceptable if such changes do not adversely affect what is truly significant about the building/setting.

2.4.4 PPG 15 also advises on uses for buildings and advises that these should be those which are the 'optimum viable uses compatible with the fabric'.

2.4.5 In paragraphs 3.16 and 3.19 PPG 15 lays out clear guidance as to the circumstances that must obtain before a consent may be given for the demolition of a listed building. Paragraph 3.19 lists these as:

"i) the condition of the building, the cost of repairing and maintaining it in relation to its importance and to the value derived from its continued use."

Although the cost of repair and restoration of Broomfield House is likely to exceed £4 million, the project has the in principle support of both English Heritage and the Heritage Lottery Fund, the continued energetic support of the local community, and the reinvigorated support from the Council. The value and enjoyment that would be derived from its restoration would seem obvious.

"ii) the adequacy of efforts made to retain the building in use."

The guidance encourages all options to be considered before demolition will be considered. Where the original use is no longer viable, owners are directed to seek to find compatible alternative changes of use. As has been demonstrated, Listed Building Consent has already been given for an alternative use which, in the view of the Secretary of State, its advisor English Heritage and the Council was compatible with its status as a listed building. Interestingly, in recognition of the fact that a change of ownership often unlocks these difficulties, the clause goes on to encourage owners, unable to find such a compatible use, to consider selling the 'unrestricted freehold of the building on the open market'. It points out how the offer of a lease only or the imposition of restrictive covenants would normally reduce the chances of finding a new use for the building.

The Council as freeholder finds itself burdened with precisely such restrictive covenants and is seeking their modification in order to widen the range of compatible uses that are available to the building, to allow its restoration and secure its future. Indeed, the Council is only seeking the modification of the restrictive covenants to the extent that it will enable the restoration of both the fabric of the listed building and, importantly, its core function as a community asset.

“iii) the merits of alternative proposals for the site.”

2.4.6 PPG 15 emphasises in paragraph 3.17 that due regard must be given to the grade of a listed building. It states that ‘demolition of any Grade I or Grade II* building should be wholly exceptional and should require the strongest justification’.

2.4.7 The paragraph goes on to underline the points made above that the Secretary of State would not give consent for the demolition of any listed building without clear and convincing evidence that:

- All reasonable efforts have been made to sustain the existing uses or find viable new uses and these efforts have failed;
- that preservation in some form of charitable or community ownership is not possible or suitable;
- or that redevelopment would produce substantial benefits for the community that would decisively outweigh the loss resulting from demolition.

2.4.8 Any application for listed building consent to demolish Broomfield House would be determined by the Secretary of State via the Government Office for London (GOL). The case for demolition would probably be heard at a public inquiry. When demolition was mooted previously it attracted substantial public opposition, followed by strong support for the restoration of the house. English Heritage have always stated that they would resist any proposal to demolish Broomfield House.

2.4.9 The planning and listed building issues relating to this case are set out in more detail in Graham Murdoch’s proof of evidence.

2.5 Significant Matters and Issues

2.5.1 Significant matters relating to the proposals were:

- Broomfield House is an important Grade II* listed building and the centrepiece of a Scheduled Grade II park, which is also Metropolitan Open Space and significant as an 18th century landscape.
- Broomfield House is significant nationally but, perhaps, more significant locally as it is part of the only group of historic buildings in Palmers Green, which otherwise has only one listed building.
- Broomfield House suffered a major fire in 1984 and subsequent fires and vandalism resulting, in 1994, in the removal of damaged fabric.
- Broomfield House was constructed over a period of centuries and contains fabric dating from 1550 onwards, the most significant of which includes: a mid 16th century core with idiosyncratic wooden framing;

interesting early 18th century panelled rooms and staircase with associated murals by Lanscroom; early 19th century rooms.

- The Park contains historic landscape and built features including 16th/17th century walls and early 18th century Stable Block and late 19th/early 20th century greenhouse.
- The Stable Yard is currently rather an eyesore and the buildings within it, particularly the Stable Block, are in poor/mediocre condition.
- Archaeological remains are expected to include the residual evidence of the 18th century garden layout believed to have included terraces and ponds.
- The house has remained burnt out, empty and unused as an eyesore in the centre of the historic park for over 20 years.

2.5.2 Key issues raised by the proposals were:

- Whether it is acceptable to construct on the lawn to the east of the house an extension to Broomfield House to help to support financially the other uses proposed in the building, which include a café to serve park users but which, otherwise, are largely community-based.
- Whether it is acceptable to construct within the Stable Yard a car park and a catering kitchen (within an existing building) to service the house.
- Whether the proposals for restoration of Broomfield House, which include a mixture of approaches, are acceptable.

3.0 THE SIGNIFICANT FABRIC AND THE EFFECT OF THE PROPOSALS ON IT

3.1 The Significance of the Fabric

3.1.1 A detailed description of Broomfield House and the other fabric affected by the proposals is included in Appendix III.

3.1.2 In summary, various studies and reports have concluded that the key significance of the Broomfield House lies in three particular areas:

- The 1726 stair hall with mural by Gerard Lanscroom, a pupil of Verrio, the mural being referred to by English Heritage as the “gem of the house”. The staircase balusters, handrail and most of the mural have survived the fire and remain in store with some conservation work having been undertaken on the mural in 1987.
- The mid 16th century timber framing and associated floor structure and brick chimney. The framing revealed has been identified as being

unusual in that its decorative form with square panels and decorative infill bracing is more characteristic of west midlands/north-west practice than London.

- The house forms the centrepiece of a Grade II public park identified by English Heritage and confirmed by archaeological excavation as incorporating surviving parts of a unique 18th century Baroque landscape - with its series of distinctive water features. These coupled with the surviving remains of garden walls, gateway, stables and garden house form the cohesive remains of a complete country house and its immediate setting.

3.1.3 It is also important to not overlook the local significance of the building and its site. As a collection of built elements, Broomfield House and Park is the last pre-suburban complex of buildings in Palmers Green. Outside of Broomfield Park, there is only one other listed building in the entire N13 postal code district. Its national significance is as in the top 6% of all historic buildings; locally its significance is much higher.

3.1.4 An English Heritage internal memorandum of March 1996 describes further the historical significance of the Park as an early 18th century water garden landscape now rather disguised by later re-modelling.

3.2 The Proposals

3.2.1 A detailed description of the proposals is included in Appendix IV. In summary, the proposals include the following uses in the extended house:

- Operation and management – within the existing envelope.
- Community rooms – within the existing envelope.
- Café – within the existing envelope but extending into a new conservatory which would be a non-dedicated space.
- Educational facilities – within the existing envelope.
- Function room – this would be a new building on the east lawn.
- Ancillary accommodation – within the existing envelope including WCs and plant space.

3.2.2 In summary, the proposals would result in the following restoration work:

- Complete restoration of the exterior of the house to its early 19th century appearance, with some limited alterations.
- Repair and restoration of the significant elements of the interior of the house.

3.2.3 In summary, the extensions of the house would lead to:

- The construction of a function room on the east lawn.
- The construction of a conservatory on the east elevation to link the house to the function room.

3.2.4 In summary, social factors addressed by the proposals are:

- The proposals aimed to provide a healthy and attractive environment.
- All rooms in the new extension would be accessible to all.
- Broomfield House would have its accessibility upgraded to allow access for all to the community rooms.
- The new café would have access to landscaped terraces and conservatory.

3.2.5 Within the park, the alterations would result in:

- The conversion of the Stable Yard to form a car park with a related traffic management plan to allow vehicular access through the existing 17th century arch to Broomfield Lane.
- Improved setting for the Stable Block and the unlisted greenhouse in the Stable Yard.
- Conversion of a Garden Store building, a curtilage structure, to provide a kitchen for catering use for functions.
- Landscaping around the house.
- Archaeological recording.

4.0 WHY THE PROPOSALS ARE JUSTIFIED

4.1 Introduction

Broomfield House, an important Grade II* building set in a Grade II park, has, for approaching 20 years, cast a deleterious shadow over Palmers Green. The most important building in the area which should be the heart of the local park/garden has stood burnt out, empty and vandalised, its repair and restoration delayed by lack of funds. The proposals set out to provide a viable future for the building and the full repair and restoration of its most important fabric. Clearly, however, there are implications for this in terms of the impact of the proposed extension and other alterations required to support this viability.

4.2 Viability, Significance and Balance

4.2.1 PPG15 allows for alterations and extensions to be considered for listed buildings in the light of economic viability arguments, but such arguments have to be balanced against what is truly interesting about the building.

4.2.2 There are perhaps, therefore, four key areas to be considered.

- Firstly, there is the consideration of what is the most significant fabric affected by the proposals. Clearly this must be the Tudor and other fabric dating from the 16th, 17th and early 18th centuries and including the Lanscroun murals.
- Secondly, there is the affect of the proposals on the Stable Yard.
- Thirdly, the Garden Store building.
- Finally the affect of the proposals on the remainder of the historic park and landscape – including the archaeology.

4.2.3 PPG15 expects that, in considering these issues, a balance of loss/gains has to be struck. It pre-supposes that if, overall, the preservation and long term future of the most significant fabric is secured, it is worth paying some cost and that is what this statement addresses in 4.3.1.

4.2.6 So what are the costs of securing the long term future of Broomfield House's most significant fabric:

- **Stable Yard:** the Stable Yard will lose a small length of its north wall at its entrance and its associated pier, which has been re-built previously and very badly. Also lost will be a part of what remains of an early 19th century (?) wall, although some of this will be retained as a memoir; and, finally, the Yard will be re-levelled.
- **The Garden Store Building:** this building, which appears to be a mixture of dates but, presumably, originally early 19th century, will be re-fitted and early 19th century partitions and floor (?) will be lost to allow it to be converted into a catering kitchen. A new opening will be formed in its north wall in part of the listed garden wall re-built in modern times.
- **The Historic Park and Gardens:** the extension will affect the archaeology to the east of the house and it will be new building in a listed park and Metropolitan Open Space.

4.2.7 It would seem that the gains for the most significant fabric outweigh the losses in this equation, but perhaps it is from the broader perspective that the proposals should be viewed. The proposals would:

- Restore an important Grade II* building with its range of periods of construction dating from the 16th century and the highly significant Lanscroom murals.
- Restore the centrepiece building to a Grade II scheduled park/garden in a style which reflects the early 18th century setting of the landscape.
- Restore to the people of this part of north London a significant community building.
- Provide a new facility which, while supporting financially the historic building, will provide a new resource for community use and a further benefit for Broomfield Park.
- Improve the setting of the Stable Yard and allow the buildings within it to be better appreciated and maintained.
- Provide the first and most important piece in a jigsaw which will see, in the longer term, the restoration of the Park itself and the other various buildings and important historic fabric with it.

4.3 Uses

4.3.1 However, key to the benefits are the uses, and that is what this statement addresses. The foregoing has explained that, in terms of the listed buildings and their setting in the listed park, the proposals are acceptable – this was confirmed by the listed building and planning consents for them. However, unless the uses prescribed for the buildings are allowed, then clearly the proposals could not be implemented.

4.3.2 That Broomfield House requires restoration is not at issue. The means by which it is restored and subsequently remains viable are. The proposals for the building would provide benign uses which are acceptable within the context of the historic building and environment, and which provide a balance of commercial uses, which would ensure viability, and community uses, which would allow its significant fabric is once more open for all to appreciate.

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2. P. N. Riddington
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CLAIM NO. LP/37/2004

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Applicant

- and -

OBJECTORS TO MODIFICATION
OF BROOMFIELD HOUSE COVENANT
Objectors

**WITNESS STATEMENT OF
PETER NORMAN RIDDINGTON**

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Appellant

- and -

OBJECTORS TO MODIFICATION OF
BROOMFIELD HOUSE COVENANT

Respondent

EXHIBIT

This is the Exhibit marked "PNR 1" referred to in the Statement of Peter Norman Riddington

I believe the facts stated in this Exhibit are true.

Signed:

Dated:

PNR 1

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CURRICULUM VITAE

PETER RIDDINGTON, *BSc (Hons), BArch (Hons), RIBA*

Architect, Senior Associate

Qualifications:

Member of the Royal Institute of British Architects
Bachelor of Science 1st Class Hons
Bachelor of Architecture Hons with Distinction

Nationality: British *Year of Birth:* 1952 *Education:* Hinckley Grammar School,
Leicestershire; University of Wales – The Welsh School of Architecture; University
Of Manchester – School of Urban Design

Joined Firm:

1990

RECENT RESPONSIBILITIES:

Royal Botanic Gardens, Kew:

Architect for the repair and restoration of Sir William Chambers' Grade I listed Pagoda.

Palace of Westminster:

Conservation Plan for the whole building complex and conservation advice on stone cleaning and repair.

Historic Royal Palaces:

Various DDA and repair projects at Kensington Palace and Hampton Court as part of a framework agreement.

Eastgate, Leeds:

Preparation of a historic buildings/development study of a large area of central Leeds to advise Hammerson and their architects/planners Terry Farrell & Partners and Leslie Jones.

Regent Street, London:

Preparation of a Conservation Plan for Regent Street and adjacent areas, and other Historic Buildings advice for the Crown Estate on their major projects, including building studies on the Regent Palace Hotel, the Quadrant and other building blocks. These projects involve advising the client's own architects, including Allies & Morrison, Dixon Jones, Sheppard Robson and others.

London's Transport and Theatre Museums:

Preparation of a Conservation Plan for the former Covent Garden Flower Market Buildings, and re-modelling and refurbishment advice.

Hadlow Place, Kent:

Re-modelling of a 20th century extension to a Grade II* house.

Kensington Palace Chapel:

Restoration of the Chapel de-consecrated in 1901. This project was awarded the Painting and Decorating Association's highest award in 2003.

Stonewall Park, Kent:

Surveys, report and restoration/repair of a mid 19th century conservatory.

Windsor Castle, Berkshire:

Project architect for the restoration of the Kings Drawing Room, Kings

Closet and White Drawing Room and the restoration of Private Rooms.

<i>Royal Hospital, Chelsea:</i>	Surveys and preparation of a Conservation Plan, including all buildings and the grounds and, subsequently, the preparation of a 10-year Development Plan for the whole estate.
<i>Royal Hospital, Chelsea:</i>	Superintendent of Grounds New Accommodation Building: New accommodation and glass houses for the gardening staff.
<i>Royal Hospital, Chelsea:</i>	Various small projects including: the Restoration of Sir John Soane's garden pavilion and new Disabled Access Facilities.
<i>Royal Holloway College, Egham:</i>	Surveys, report and project architect for repairs to and cleaning of decorated plaster ceiling and walls of Grade I Chapel.
<i>6 Burlington Gardens, London:</i>	Conservation Plan and historic buildings advice to the Royal Academy of Arts and Michael Hopkins & Partners.
<i>Royal Academy of Arts, London:</i>	Surveys and preparation of a Conservation Plan for Burlington House, the Galleries and School and subsequently the Courtyard.
<i>Royal Academy of Arts, London:</i>	Advice on restoration proposals for Burlington House.
<i>Chelsea Physic Garden, London:</i>	Condition survey and maintenance plan for the historic garden and subsequently surveys and proposals for the restoration of the Cold Fernery.
<i>Broomfield House:</i>	London Borough of Enfield. Architect for restoration works to 16 th century and later house and 18 th century stable block.
<i>Sarsden House Conservatory:</i>	Project architect for the restoration of a derelict early 19 th century glass house.
<i>College of Arms:</i>	Advice on the refurbishment and re-decoration of the Earl Marshal's court.
<i>Historic Buildings Reports:</i>	Surveys and reports on different historic buildings for a range of clients including: Cadogan Estate; Crown Estate; Portman Estate; Grosvenor Estate; UGC Cinemas; West Midlands Fire Brigade; Calthorpe Estate (Birmingham); and other private clients.
<i>Condition Surveys and similar Inspections and Reports:</i>	Surveys and reports completed for Hampton Court Palace, DEFRA and Customs and Excise Estates historic estates under the OGC framework agreement. Also QI inspections for St Andrew Bobola (Hammersmith) and Our Most Holy Redeemer, Exmouth Market.

EXAMPLES OF PREVIOUS WORK:

Repairs, Improvements and Conversion of Historic Buildings:

<i>1900 House, London:</i>	Project architect for the restoration of a London terraced house for a TV company, shown on Channel 4.
<i>25 Queen Anne's Gate:</i>	Project architect for remodelling of Grade I early 18 th century town house.
<i>Glassenbury Park, Kent:</i>	Project architect for remodelling of Grade II* moated 17 th century and later house, estate buildings and park.
<i>Lincoln's Inn Chapel, London:</i>	Advice on repairs to plasterwork.
<i>Windsor Castle, Berkshire:</i>	Phase 4A: Project architect for the reinstatement of three major State rooms following the fire of 1992. Phase 3C: Project architect for the restoration of ancillary accommodation to State rooms.

The restoration has won to date ten design and building awards, including the Plaisterers Trophy and Europa Nostra Gold Medal.

<i>Chandos House, London:</i>	Phase 1A project architect for the repairs phase of the refurbishment works of Robert Adam town house.
<i>Seamore Project, London:</i>	Historic buildings study and report for major development in Mayfair.
<i>Green Park Station:</i>	Feasibility study for the re-design of the station entrances to the Royal Park.
<i>Royal Holloway College:</i>	Project architect for the restoration of the clock.
<i>College of Arms:</i>	Survey and report on the roofs and new lighting scheme for the Record Room.
<i>The Mansion House, City of London:</i>	Project architect for major refurbishment for the Corporation of London. (Europa Nostra Award Diploma 1993, City Heritage Award 1994, Guild of Architectural Ironmongers Award 1994, Decorating Contractors Award 1994).
	<i>New Buildings:</i>
<i>Day Centre for Sherborne House Trust:</i>	Design of a day centre for the Sherborne House Trust and Inner London Probation Service.

OTHER ACTIVITIES AND APPOINTMENTS:

Co-author of "The Greatest Glasshouse in the World", a book describing the history, the plants and the restoration of the Kew Palm House.
Contributions to various publications on the history of glass houses, restoration techniques for plasterwork and historic interiors.
Lectures on building conservation and restoration.

Member of the Society for the Protection of Ancient Buildings and Association for Studies on the Conservation of Historic Buildings.
Included on the London Diocesan Advisory Committee's list of approved architects.

PREVIOUS EMPLOYMENT:

1989-90 Rothermel Thomas (with Ashley Barker)
Designs for environmental improvement and extended shopping facilities at Watney Market, Commercial Road, London E1. Designs for refurbishment at 6 Lothbury, London EC2. Survey and report on iron work at Smithfield Market. Competition designs for new building for Dulwich Picture Gallery. Planning Studies for Salisbury Cathedral Close and Liverpool Street Conservation Area.

1980-89 Property Services Agency, Special Buildings Group, London Region (As Senior and later Principal Architect)
Project manager and/or architect for repair, refurbishment, conversion: Horse Guards, Whitehall; Natural History Museum, South Kensington; Apsley House, Piccadilly. Project manager/architect in Royal Botanic Gardens, Kew; Jodrell Laboratory extension; Herbarium extension; restoration of Palm House and new Marine Display area; restoration of the Temple of Bellona; conversion of Museum No.2 for School of Horticulture; feasibility studies for restoration of Aroid and Water Lily Houses and new Unified Science Building. Repairs to Kew Palace. Works in Kew Gardens Europa Nostra Award 1990.

1978-80 London Transport Executive

Designs and modernisation of Underground stations.

1975-77 Spelthorne District Council

New housing and refurbishment.

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EXHIBIT

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I believe the facts stated in this Exhibit are true.

Signed:

Dated:

SUMMARY OF THE HISTORY OF BROOMFIELD HOUSE

History

Broomfield House dates, in part at least from the 16th century and is noted particularly for its splendid 18th century stair murals by Gerard Lanscroun. By the 20th century, successive waves of additions and alterations fully enveloped and concealed its interesting original core, dating from the mid 16th century, fragments of which were only revealed by a major fire in 1984 and which were recorded by the Museum of London's Archaeological Survey of the building under taken on behalf of the Historic Buildings Division of the Greater London Council.

This fire was the first of many which affected the now empty building over the following ten years, during which time a number of proposals for repair and reuse were actively considered and developed.

Continuing fires and vandalism prompted English Heritage to undertake further research and interpretation study culminating in their 1994 report "Broomfield House, Enfield, The Structural Development of the House" and Steven Brindle's "Broomfield: An Illustrated History of the House and Garden" in 1994.

Because of further damage following another major fire and consequent destruction of some supporting structure, resulting in parts of the building becoming dangerous, English Heritage reluctantly agreed to some selective demolition and clearance in 1994, with movable joinery items being taken to a protective store.

This work enabled accumulated debris and dangerous fabric in the interior of the house to be cleared out and the structure to be propped and made safe. Subsequent deterioration of the surviving fabric has been limited to minor vandalism.

In summary, the chronology of the house with a note of surviving fabric is:

1550

A hall was built with a jettied cross wing in what is now the core of the house, large parts of which survive, including the wooden wall and floor framing and a decoratively painted lintol over a ground floor window.

1570

The original building was extended to the north and a floor and huge chimney stack inserted into the hall. Much of this fabric survives.

1600

Alterations were undertaken and extensions were added to the south and east. These barely survive.

1624

A wing was added to the north of the 1570 extension and the house was extended to the east. The north extension survives in part, but is so badly damaged to be largely beyond repair. The east extension survives in part.

1726

A major neo classical re-modelling of the house took place and included the installation of the Baroque staircase, Lanscroun murals and panelling to the ground floor entrance hall and other rooms. Much of this survives.

1820

The last of the radical changes was undertaken by the Cybbe Powys family. At this time, the house was changed from a many gabled house to its surviving form with a large extension to the north, infilling in the southeast corner and the portico added. The north range survives, as does the portico and the overall building form from this time.

Early 20th century changes in the Edwardian period and subsequently in the 1930s included the addition of bay windows and entrance porch to the rear of the house and the well known faux timbering to the outside.

1984

A major fire swept through the house, by then employed as a local history museum, and largely destroyed the roof structures.

1984-1994

Further fires and vandalism culminated in another major outbreak in 1994, when wall linings and other joinery stored in the house were set afire and heavily, but, thankfully, not terminally, damaged.

1. London Borough of Enfield
2. P. N. Riddington
3. First Statement
4. Exhibits "PNR 1" – "PNR 4"
5. Dated this day of January 2006

IN THE LANDS TRIBUNAL

CLAIM NO. LP/37/2004

BETWEEN:

THE MAYOR AND BURGESSES OF
THE LONDON BOROUGH OF ENFIELD

Appellant

- and -

OBJECTORS TO MODIFICATION OF
BROOMFIELD HOUSE COVENANT

Respondent

EXHIBIT

This is the Exhibit marked "PNR 3" referred to in the Statement of Peter Norman Riddington

I believe the facts stated in this Exhibit are true.

Signed:

Dated:

DESCRIPTION OF THE FABRIC

Broomfield House – Surviving Fabric and Features

The first major fire in 1984 attacked the core of the building, damaging the 17th century stair murals and its supporting woodwork as well as the rooms immediately adjoining and destroying the roof, it also revealed previously concealed 16th century timber framing. Following cocooning of the building and the removal for conservation of the stair mural in sections, successive fires affected the north-west corner and the south-east corner destroying stud partitions and first floor structure in these areas, but leaving intact the brick chimney stacks and the perimeter brick and studwork facades - though badly damaged and weakened in some sections. More seriously, stored panelling and doors was damaged and some lost.

The result of this process of attrition is that while large parts of the building have been destroyed, large areas have survived the ordeal in situ and these interestingly represent the main periods of building activity and include:

Parts of the **16th century timber framed gables** on the first floor.

The main Tudor chimney.

Fragments of the 16th century floors ie on the west side.

Painted 16th century decoration to a beam on the in the ground floor.

The plain **early 19th century brick elevations** to the north range.

Some sashes and shutters.

In addition to these are the mural and stair timbers stored off-site, together with simple attractive cast iron fireplace inserts, assorted sections of panelling, panelled doors and other joinery also now stored off-site.

The Garden Store Building

This building appears to have been originally constructed in the early to mid 19th century, but has been heavily re-built and re-finished in subsequent years and clearly had a major overhaul/re-build in the 1930s or 50s when the east wall was re-built and the roof structure was all but replaced, only one truss and a very occasional rafter of the original fabric surviving.

The Stable Yard

The Stable Yard is surrounded by a miscellany of buildings of different periods and types, the key ones of which are either listed buildings or make positive contribution to the setting of the listed fabric, which includes the surrounding walls to the east and north and the Stable Block. The Stable Block is in poor order, but is a significant early 18th century building and listed Grade II*.

The unlisted buildings include the Garden Store building, described above, and the rather good late 19th/early 20th century lean-to greenhouse which, presumably, supported the earlier growing ground. Other buildings are of less consequence, particularly the Park Lodge houses, which are a dreary mid 20th century terrace that does nothing to improve the setting, and the southern walls (and the back of the aviary) are modern construction.

The Walls South and East of Broomfield House

The 16th century walls survive to the east of the opening to the rear of the house adjacent to the Holm Oak tree. This opening and the adjacent wall to either side of it were completely re-built in the early 1980s after the original wall was undermined by the tree in this location. The reconstruction is really not of terribly good quality – the bricks are a poor match to the originals and the wall was built forward of the original wall line and the arch is a mediocre representation of what previously existed.

The walls further to the west of the opening and south of Broomfield House appear to be a mix of periods, but (apparently) largely 19th century.

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Signed:

Dated:

PNR 4

DESCRIPTION OF THE PROPOSALS

Broomfield House and Extension

Uses

The building will be converted and extended to accommodate the following uses:

Operation and Management

The building will be operated and managed by a Trust who will be responsible for all letting and franchise arrangements, but who will have within the building an office at first floor and the reception and shop at ground floor and various display areas around the building.

Community Rooms

These will be housed in seven different rooms divided between the ground and first floor and will be used for meetings and conferences as a community resource. The users of these rooms will have use of the pantry area at first floor level for the preparation of snacks and beverages.

Café

This will be located in the south and southeast corner of the original building and will spill onto terraces to the east and south and west of the building. The café will have a small dedicated kitchen which will be serviced, through the main body of the building, and a servery area. It is intended that the café will operate in a manner similar to that at Kenwood House with a self-service type arrangement.

Educational Facilities

It is a key element of the operation of the building to provide an educational resources room for schools and other institutions to use within the Park. This resource will help facilitate lifelong learning experiences and will additionally encourage learning about the Park, its ecology and history and, perhaps most pertinently, the House itself and its position in the history of Palmers Green. This room, and its associated office, are to be located at first floor level.

Functions

The proposed extension to the east of the house will include a room for dedicated functions. This room, which will accommodate up to 150 people sitting to eat, is intended to provide scope for a wide range of community activities which otherwise could not be accommodated within the original building and would provide a key element in the financial viability equation for the building. It is of a size which is rare in Palmers Green, outside of school halls, and it is expected it will provide a venue for activities such as: weddings; exercise classes; antique/collectors' fairs of different types etc, all of which would support the other community uses in the historic fabric. It is proposed to convert the former Garden Store building in the Stable Yard to accommodate a catering kitchen to service the Function Room for commercial hire – see below.

Non Dedicated Use Space

A new conservatory extension will act as a utility space linking the house to the Function Room, but also providing a dry sheltered area for community uses and café/park users in inclement weather.

Ancillary Accommodation

Naturally, sufficient WCs to support the various uses of the building will be provided, along with supporting mechanical and electrical plant rooms.

Outline Description of the Proposals

Externally

It is proposed to restore the house generally to its appearance following the early 19th century works, but retaining the early 20th century bays where these survive. This will mean that the roof will be finished in blue slates with lead dressings, the walls plain lime stucco finished and painted, and the window and door joinery painted wood and external metalwork painted. Access to the building will be provided: a new entrance to the Café to the south from the drive and new terrace with a new portico sympathetic to the proposed period of restoration; the pre-fire entrance to the House via the portico from the west; to the Function Room through the existing arch in the wall southeast of the original building; and, through an open courtyard; the arch will be fitted with a wrought iron gate.

Internally

It is proposed to repair and restore the interior of the House where this is practical. Areas to the southeast at ground and first floor levels which are beyond repair/restoration will be re-built.

Alterations to the pre-fire layouts include: re-building of the northwest corner to incorporate a lift and new service staircase and a lowered ground floor level locally; the re-modelling of the southeast corner to include a secondary service staircase; the creation of a structural glass roofed two storey area to the east of the re-built 16th century gable to allow this to be viewed from both ground and first floor levels.

The Roof

The roof will be restored to its pre-fire appearance using modern construction techniques. To allow for plant to be accommodated, the central section of the roof over the north range will be reconstructed as a flat roof.

The Basement

Minimal repair works are intended in the basement other than the installation of boilers and other plant in the area below G3. This will involve the lowering of the basement floor level in this area and demolishing the existing basement steps and extending the area, installing new access steps and re-locating the door opening.

The New Extensions

These are proposed to be contemporary buildings which will provide a clear distinction between modern and original fabric.

The Function Room envelope is conceived as an extension to the 16th century walls, upon which is superimposed an umbrella pyramid roof suspended above clerestory glazing. The clerestory glazing, which links to the other elements of the extensions, will sit immediately above the top of the existing walls and will provide a fascia depth behind which the glass roof of the conservatory and the more traditional construction of the other roofs will be hidden. It is intended by this device to emphasise the original, while expressing the modern in a contrasting idiom. Low level windows in the Function Room will be designed as sliding doors on tracks to allow the room to relate to the Park more closely in better weather.

The conservatory is designed to have a minimal structure with structural glass roofing on lightweight columns etc. The glazing to the north wall is conceived as sliding folding doors which will allow the entire wall to be opened in better weather.

The materials of the new buildings will contrast with the original House, but the brick walls to the Function Room will match as closely as possible the original garden walls with black/red/purple stocks in English Garden Wall band. Otherwise, the roof of the Function Room will be clay tiled with a structural glass lantern and the conservatory and other glazing will be large paned glass in aluminium frames with polished stainless steel fittings. Internally the finishes will also be modern, the Function Room having wooden boarded roof soffits and exposed laminated beams with steel fittings and steel and wood structural frames. The walls here will be exposed 16th century brickwork and new matching bricks and a light polished wood floor.

The conservatory will have a flagged floor with painted stucco finished walls.

The Approach to Restoration

The approach to restoration will be on the basis of:

- **Equivalent Restoration** of the areas of the house where sufficient original material remains to act as a basis for restoration.
- **Re-building Utilising Existing Materials** in areas of the house where limited original material remains either as in situ structural elements or salvaged joinery but where some physical alteration is required.

Although the roof will be reconstructed with a new roof structure and finish certain pieces of the pre-fire cupola will be inserted into this re-built feature.

The external walls of the building will reincorporate all sound structural elements in the reconstruction and the pre-fire fenestration pattern will generally be reproduced utilising original window joinery where it survives and with new matching the pre-fire designs.

- **Reconstruction of the southeast areas.**
- **The Lanscroom Murals** - it is proposed that the reconstruction of the staircase well will be carried out to allow the Lanscroom Murals to be restored in the building in their original positions. The work will require a new support structure to be erected in the stairwell to which the panels of original lath and plaster will be re-fixed.

The Park

The Stable Yard

It is intended that this area will be used as a car park to service the uses in the restored and extended Broomfield House. This will involve removing all of the low quality and temporarily built fabric in the Stable Yard. In association with this proposal, it is intended to introduce a traffic management scheme which would allow access into the new car park from Broomfield Lane through the existing arched opening.

The construction of the car park will require the re-levelling of the area and paving with a sub-base and a sealed gravel asphalt finish, with the bays marked out in brick pavings. It will also require the reconstruction of the east entrance pier and its re-location to the east.

The car park will be landscaped with trees and shrubs.

The Greenhouse and Stable Block

Although not part of this project, these two buildings will be affected by them. The proposals allow for both buildings to be retained and in a manner, with good managed access, which will both allow their viable use and mean they will be less liable to vandalism. The removal of the shanty town of temporary and low quality buildings and re-surfacing and landscaping will also improve their setting.

The Garden Store Building

This building will be converted into a new catering kitchen to service Broomfield House and its new extension. It is proposed that the internal partitions in the building will, in large part, be removed, but the masonry partition will be removed at low level and the upper part retained supported on a beam. The remaining wooden floor will be replaced with concrete and the internal walls and ceiling will be lined out in modern materials in a manner that will be reversible.

On the north wall of the building the intention is to form a new opening directly onto a new path to link to the drive and provide convenient access to Broomfield House. This opening will be in an area of brickwork re-built in the 20th century.

Landscaping around the House

New paths and terraces around the house will be finished in asphalt with a sealed gravel finish. New steps to the east will be in York stone with a wrought iron handrail and the new retaining

wall adjacent will be finished in brickwork to match the garden walls and the new extension, but will be capped with a York stone coping.

Archaeological Recording

It is proposed that the archaeological recording, both below ground and of the standing building, will be undertaken to an agreed programme to a brief agreed with English Heritage.