

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 29th January 2013

Report of
Assistant Director, Planning &
Environmental Protection

Contact Officer:
Aled Richards Tel: 020 8379 3857
Andy Higham Tel: 020 8379 3848
Mrs S.L. Davidson Tel: 020 8379
3841

Ward: Ponders
End

Application Number : P12-02677PLA

Category: Dwellings

LOCATION: Former Middlesex university Campus, No's 188-230 (even) (excluding No.228), Ponders End High Street and Ponders End Library and associated parking area, College Court, Enfield EN3.

PROPOSAL: Demolition of existing buildings on site (excluding the Broadbent Building, Gymnasium, Caretakers Cottage, multi storey car park to the Queensway frontage and 198 High Street) and the redevelopment of the site to provide a mix of residential (Class C3), business (Class B1), retail (Classes A1-A4) and community uses (Class D1), hard and soft landscaping and open space, new connection (vehicle and pedestrian) to High Street via College Court, retention and alteration of existing accesses to Queensway, car and cycle parking (including alterations to car parking arrangements within College Court) and all necessary supporting works and facilities, including an energy centre; the retention, refurbishment and extension of the listed Broadbent building, retention and refurbishment of the associated caretakers cottage and gymnasium to provide up to 43 residential units, 2,141sq.m (GIA) of commercial/live work floor space (Class B1) and 427sqm (GIA) of community use (OUTLINE with some matters reserved - Access).

Applicant Name & Address:

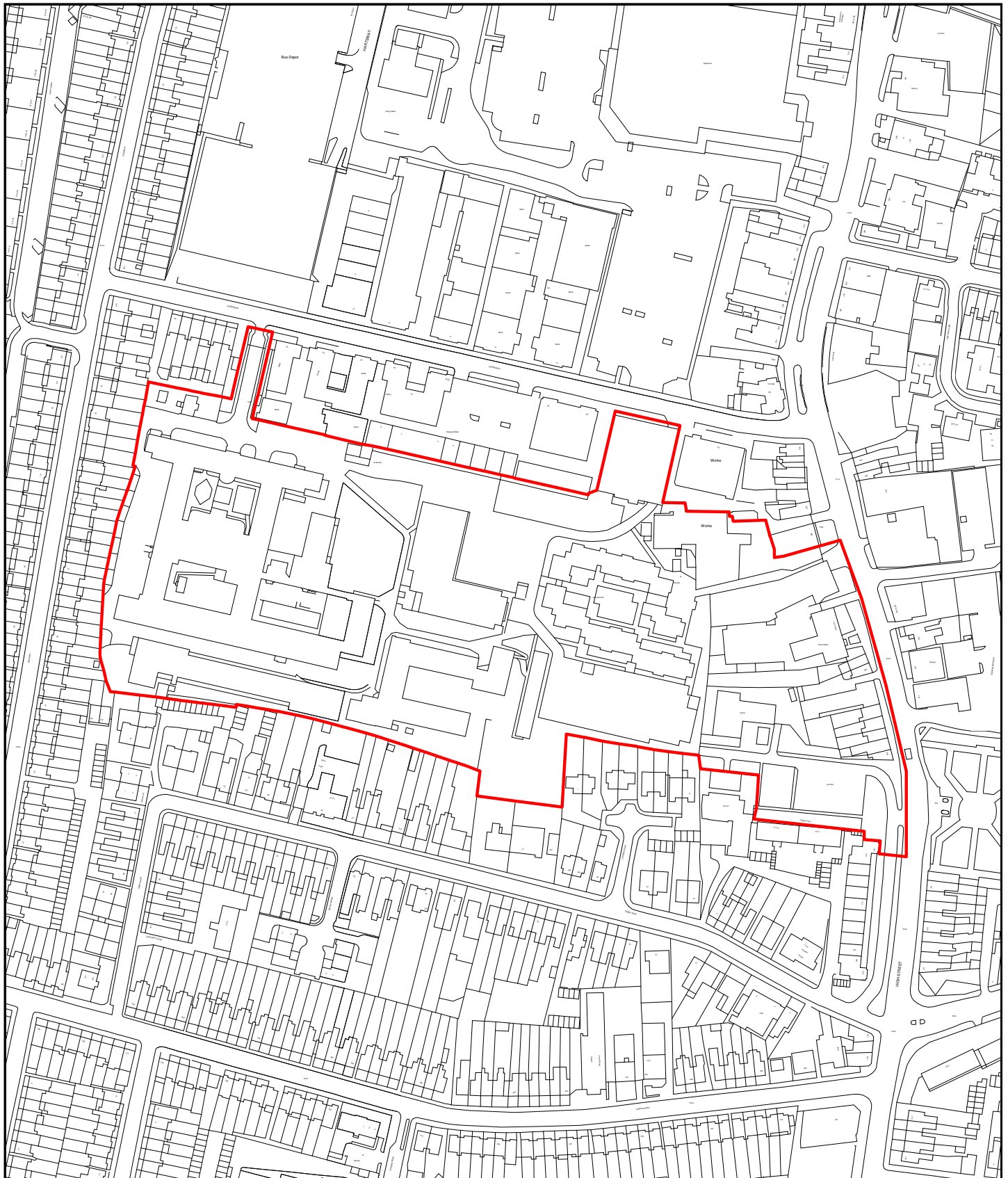
London Borough of Enfield
CIVIC CENTRE,
SILVER STREET,
ENFIELD,
EN1 3XA

Agent Name & Address:

Jennifer Ross,
Tibbalds Planning and Urban Design
19, Maltings Place
169, Tower Bridge Road
London
SE1 3JB

RECOMMENDATION:

That, subject to referral to the Great London Authority, planning permission to be **GRANTED** in accordance with Regulation 3/4 of the Town and Country Planning General Regulations 1992 subject to conditions.



Development Control



Scale - 1:2500
Time of plot: 10:59

Date of plot: 18/01/2013

1 Site and Surroundings

- 1.1 The application site comprises the former Middlesex University Campus, Ponders End, which extends to approximately 3.86ha, together with No's 188-230 (even) (excluding The Mosque at No.228), Ponders End High Street and Ponders End Library and associated parking area within College Court . The application site also includes the existing parking area to the rear of Enfield Enterprise, Queensway. The total site area extends to 5.21ha.
- 1.2 The University campus was vacated in 2008 following the rationalisation and relocation of the University facilities to other sites around London. The campus has remained vacant since this time. With the exception of the former Police Station, which is now vacant, and the site of No.216 High Street, which has been cleared, the remainder of the application site remains largely in occupation, with a variety of small businesses and the Library.
- 1.3 The University campus contains several existing buildings, including the Grade II Listed Broadbent Building, the adjoining Gymnasium and Caretaker's lodge (also covered by the Listing) and a range of more modern teaching blocks, the multi-storey car park to the Queensway frontage and the Ted Lewis Halls of Residence which comprised 347 en-suite student bedrooms arranged into 52 flats. The High Street frontage comprises the single storey retail units at Nos.188-196 High Street, Tara Kindergarten at No.198 High Street, a further pair of 2 storey retail units at Nos. 200/202 High Street, the former Police Station, the cleared site of the former Beef and Barrel Public House and the industrial unit at No.230 High Street, that sits back from the High Street frontage, behind the Mosque. The application site includes Ponders End Library, off College Court and the car parking area that functions as a parking area serving residents in College Court as well as the local shopping area and library.
- 1.4 The University campus benefits from two points of vehicle access to Queensway, one adjacent to No.50 Queensway and a second exit from the site through the multi-storey car park. An array of vehicular accesses exist to various business premises to the High Street frontage together with the access to College Court. In addition there is an existing pedestrian only entrance from the High Street into the University campus, adjacent to the now cleared site of the former Beef and Barrel Public House, 216 High Street.
- 1.5 The site is bounded to the south and west by existing residential development in Derby Road, Loraine Close, College Court and Kingsway. To the north of the site is the Queensway industrial estate, designated as a Locally Significant Industrial Site, a small terrace of residential properties, the Mosque and an industrial unit to the Queensway frontage which is partly vacant but with the upper floor occupied as a children's activity centre. To the east lies Ponders End High Street, with its mix of retail, community and associated facilities and Ponders End Park.

2 Proposal

- 2.1 This is an outline application submitted by the Council for the demolition of existing buildings on site (excluding the Broadbent Building, Gymnasium, Caretaker's Cottage, multi storey car park to the Queensway frontage and

198 High Street) and the redevelopment of the site to provide a mix of residential (Class C3), business (Class B1), retail (Classes A1-A4) and community uses (Class D1), hard and soft landscaping and open space, a new connection (vehicle and pedestrian) to High Street via College Court, retention and alteration of existing accesses to Queensway, car and cycle parking (including alterations to car parking arrangements within College Court) and all necessary supporting works and facilities, including an energy centre; the retention, refurbishment and extension of the listed Broadbent building, retention and refurbishment of the associated caretaker's cottage and gymnasium to provide up to 43 residential units, 2,141sq.m (GIA) of commercial/live work floor space (Class B1) and 427sqm (GIA) of community use.

2.2 The application is in outline form with all matters, except access, reserved for the majority of the site, but with no matters reserved with respect to the works proposed to the Listed Building. However, an illustrative layout has been submitted demonstrating what form the development may take on site. In addition the application is supported by a variety of documents in particular a Planning Statement, Design and Access Statement, Development Specification and Design Principles Statement, and a Parameters Plan that confirm in greater detail the form and mix of development proposed.

2.3 The applicant's Planning Statement and other supporting documents confirms that in terms of detail the application proposes:

- The demolition of approximately 150sqm of existing residential floorspace.
- The demolition of approximately 25,549sqm of existing non-residential floorspace
- The retention, refurbishment and conversion of Tara Kindergarten, 198 High Street to provide up to 491sqm of replacement library accommodation to replace the College Court Library lost as part of the development
- The retention, refurbishment and extension of the listed Broadbent building, caretaker's cottage and gym to provide up to 43 dwellings, 2141 sqm of commercial live/work floorspace (B1) and 427sqm of community use (D1)
- The retention and refurbishment of the existing multi-storey car park on Queensway to provide parking for up to 166 cars (including up to 47 replacement spaces for employees of Enfield Enterprise) and an energy centre
- The construction of up to 39,927 sqm of new residential floorspace, including 1,088sqm (GIA) as an extension to the listed Broadbent Building, to provide up to 377 new, mixed tenure dwellings (12 within the Broadbent building)
- The construction of up to 567sqm of new commercial B1 floorspace
- The construction of up to 776sqm of new mixed retail (A1-A4)
- The construction of up to 156sqm of new community D1 floorspace
- Surface car parking on street, within College Court car park and in structure parking within Plot A1 for up to 252 cars (212 residential, 10 commercial, 27 retail (College Court replacement) and 3 community)
- A new vehicle and pedestrian access connecting the site to the High Street, through College Court
- The retention of the existing points of vehicular access to Queensway

- The retention and enhancement of the existing pedestrian link to the High Street adjacent to the Mosque.
 - The introduction of new public open space and public realm and private amenity space.
- 2.4 The Parameters Plan submitted with the application sets out, as the name suggests, the parameters for the development proposed, setting out maximum building heights, distances between facing buildings, size of residential courtyards etc. The Development Specification and Design Principles document effectively provides the design code for the development which the subsequent detailed submissions will be required to adhere to. These documents confirm that the development to the High Street frontage would have a maximum height of 4/5 storeys. Development within the site would be a maximum of 6 storeys, but with this height of building being located either centrally within the site or towards the industrial units to the north. The development that would run parallel to the southern boundary would generally be 3 storeys in height, with a maximum of 4 storeys towards the eastern end. The documents confirm however, that whilst these are the maximum parameters, each reserved matters submission will need to demonstrate compliance with sunlight and daylight standards, distancing etc in order to ensure an appropriate relationship between buildings and with existing residential properties, particularly to the south.
- 2.5 In terms of the listed Building the application proposes the removal of the more modern additions to the buildings and the conversion and extension of the Broadbent building involving the erection of a new wing to the south of the building to the same height as the existing building to create 43 residential units, 2141sq.m of live/work units. The caretaker's cottage would be retained and refurbished for use as light industrial work space and the gymnasium retained and refurbished for use as community space.

3 Relevant Planning Decisions

- 3.1 A planning application submitted by the current owners of the former University Campus has recently been refused (P12-00732PLA). This application related to the campus site only and was a full planning application proposing the redevelopment of the site to provide a total of 471 residential units and 975 sq.m. of commercial B class floorspace in a 4-storey block to the Queensway frontage. The application proposed the conversion of the Listed Building into 128 units, with the erection of a three storey extension to its southern side, together with the construction of a 2nd floor above an existing central link and the conversion of the adjoining Listed Gymnasium to community facilities for future residents. All other remaining buildings on site would be demolished, including the caretaker's cottage. A total of 343 new residential units were proposed in the form of a 40 x 2-storey 4-bed houses to southern boundary, with accommodation in roof space and front dormer windows; the erection of 10 x 4-storey blocks comprising 295 units (134 x 1-bed, 82 x 2-bed, 79 x 3-bed) incorporating roof terraces; and the erection of 1 x 2-storey block of 8 x 1-bed units. Vehicle access to the site was to remain from Queensway, utilising the existing access adjacent to No.50 Queensway, with the construction of new reconfigured point of access where the multi-storey car park presently stands. A new internal road layout was to be provided within the development, along with the provision of 239 car parking

spaces, play space and landscaping. The existing pedestrian link adjacent to the High Street, adjoining No.216, was to be retained.

3.2 It has been resolved that the application be refused for the following reasons:

- 1 The proposal, by virtue of the density, mix and tenure of units proposed, the concentration on starter and one-bed units, the lack of family units and the failure to make any provision for affordable housing, would fail to create a balanced and sustainable community on this key strategic site within Ponders End and this would prejudice the regeneration of this area. In this respect the development would be contrary to London Plan policies 3.5, 3.8, 3.9, 3.11, 3.12, 3.13, 7.1 and 8.2, Core Policies 3, 5, 9, 40, 41 and 46 of the Enfield Plan Core Strategy and National Planning Policy Framework
- 2 The proposed development, and particularly the size, siting and design of blocks 5, 10 and 15 in relation to adjoining sites, would prejudice the development potential of those sites and particularly the size, siting and design of blocks 10 and 15 would fundamentally compromise the comprehensive redevelopment of the High Street frontage, as identified in the Ponders End Central Planning Brief, detrimental to the regeneration of this area. In this respect the development would be contrary to London Plan policy 7.1, Core Policies 40 and 41 of the Enfield Plan Core Strategy, Policy (II)H8 of the Unitary Development Plan, the Ponders End Central Planning Brief and the National Planning Policy Framework.
- 3 The proposed development, by virtue of its density, design, layout, massing and access would result in a poor quality and illegible environment that fails to satisfactorily integrate with its surroundings, fails to provide a safe and secure environment for future residents and which would fail to take the opportunities available for improving the character and quality of the area and the way it functions. In this respect the development would be contrary to London Plan policies 3.2, 3.5, 7.1, 7.3, 7.4 and 7.6 of the London Plan, Core Policies 4, 30 and 41 of the Enfield Plan Core Strategy, Policies (II)GD3, and (II)H8 of the Unitary Development Plan, the Ponders End Central Planning Brief and National Planning Policy Framework.
- 4 The proposal by reason of the works proposed to the fabric of the Broadbent Building, including the proposed extension to the auditorium, together with the demolition of the Caretaker's Cottage, would result in undue harm to the significance of the heritage asset, contrary to London Plan policies 7.8 and 7.9, Core Policy 31 of the Enfield Plan Core Strategy, Planning Policy Statement 5 Practice Guide and the National Planning Policy Framework.
- 5 The proposed development would result in the generation of additional traffic on the local and strategic road network, exacerbating existing capacity issues, without making provision for appropriate mitigation to improve accessibility to the site for non- car modes. In this respect the development would be contrary to London Plan policies 6.1, 6.2, 6.3, 6.9 and 6.10, Core Policies 24, 25 and 26 of the Enfield Plan Core Strategy and Policy (II)GD6 of the Unitary Development Plan
- 6 The applicant has failed to provide adequate information for the Local Planning Authority to determine the likely impact of the proposals on protected species (bats, reptiles and black redstarts), which are a material consideration. This is contrary to the Enfield Plan Core Strategy policy CP36, the London Plan Policy 7.19 and national planning policy in the

form of Government guidance on biodiversity in the planning system - Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (not revoked by the NPPF) and if the Local Planning Authority were to approve the application it could be found to have failed to comply with its duties under the 2010 Habitat Regulations.

- 7 The applicant has failed to demonstrate how opportunities have been taken to “protect or enhance the natural environment” and “improve biodiversity” which is contrary to the National Planning Policy Framework, the Enfield Plan Core Strategy Policy CP36 and the London Plan Policy 7.19.
- 8 Insufficient evidence has been submitted to demonstrate that the submitted energy strategy adheres to the principles of the energy hierarchy, represents the most efficient use of plant, delivers an adequately sized energy centre and aligns with the overall strategic objective to deliver a decentralised energy network to the North East Enfield and Ponders End strategic development area to accord with Strategic Objective 2 and Policies CP20 and CP40 of the Enfield Plan Core Strategy, emerging Policy DMD51 of the Development Management Document, the emerging North East Enfield AAP, Policies 5.2, 5.3, 5.5, 5.6 and 5.7 of the London Plan and the National Planning Policy Framework.

3.3 This decision has had to be referred to the GLA in accordance with their Stage 1 response and their confirmation that they agree with the Council’s decision is still awaited to enable the Decision Notice to be issued.

3.4 The concurrent Listed Building Consent application (P12-00733HER) for the works to the Listed Building, including the demolition of the caretaker’s cottage, was also refused for the following reason:

- 1 The proposal by reason of the works proposed to the fabric of the Broadbent Building, including the proposed extension to the auditorium, together with the demolition of the Caretaker’s Cottage, would result in undue harm to the significance of the heritage asset, contrary to London Plan policies 7.8 and 7.9, Core Policy 31 of the Enfield Plan Core Strategy, Planning Policy Statement 5 Practice Guide and the National Planning Policy Framework.

4 Consultation

4.1 Statutory and non statutory consultees

Greater London Authority

4.1.1 The GLA advise that “London Plan policies on mix of uses, employment , social infrastructure, housing, urban design, heritage, inclusive access, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- Mix of uses: The residential-led mixed use redevelopment of the site is strongly supported in accordance with London Plan policy 2.13

- Employment: The proposed loss of B1(c) local employment land/floorspace does not raise a strategic concern.
- Social Infrastructure: The Council should clarify how the development will make an appropriate re-provision of existing nursery facilities, to ensure accordance with London Plan Policy 3.16
- Housing: The proposed 30% provision of affordable housing is supported subject to verification that this represents the maximum reasonable amount in line with London Plan Policy 3.12. A review mechanism for reappraising later phases of the development is also sought. The proposed housing mix, tenure split, residential standards and play space provision is supported in accordance with London Plan Policies 3.5, 3.6, 3.8, 3.9 and 3.11. Clarification is sought with respect to density to ensure accordance with London Plan Policy 3.4 .
- Urban Design: The design of the outline master plan is strongly supported, however, further discussion is sought with respect to promoting future southern access to workspace in the Queensway Industrial Estate, and activating the north-south pedestrian route on the west side of the car park block, in accordance with the principles of London Plan policies 7.8 and 7.9
- Heritage: The commitment to refurbish and convert the former technical college and gymnasium, in order to help secure the long term future of these buildings, is supported in accordance with the principles of London Plan Policies 7.8 and 7.9.
- Inclusive access: The approach to access and inclusion is broadly supported, however, clarification is sought with respect to disabled parking provision and the proposed home zones/shared surfaces in accordance with London Plan Policy 7.2
- Sustainable Development: The proposed energy strategy is broadly supported, however, clarifications are sought with respect to energy efficiency, district heating, combined heat and power, renewable energy technologies and overall carbon dioxide savings in accordance with London Plan Policies 5.2, 5.6 and 5.7. The proposed climate change adaptation measures are broadly supported, however, further information is sought with respect to the tree strategy in line with London Plan policy 7.21
- Transport: Further information and commitments are sought with respect to: trip generation and highway impact, access and parking, public transport; walking; and travel planning to ensure accordance with London Plan Policies 6.3, 6.7, 6.9, 6.10, 6.13 and 6.14

4.1.2 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. However, the resolution of the above issues could lead to the application becoming compliant with the London Plan

4.1.3 The GLA have advised that if the Council resolve to make a draft decision on the application, it must consult the Mayor again and allow him 14 days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application, and any connected application.

Transport for London

4.1.4 Transport for London advise the following:

Trip Generation and Highway Impact

4.1.5 The sites selected for calculating the trip rates do not comply with TfL's best Practice Guidance. However, in this case they advise that they are acceptable as they produce the worst case scenario and therefore TfL is satisfied. TfL has requested that evidence be provided for the validation of the base traffic models to ensure they comply with TfL modelling guidance.

4.1.6 TfL express concern about the operation of the A1010 High Street/South Street/Derby Road junction, wish to ensure a 'nil detriment' impact from the proposed development in terms of capacity and would welcome further discussion with the Council in this respect. Possible mitigation could include the conversion of this junction to SCOOT control including review of timings although they have confirmed that this is not a requirement of the application.

4.1.7 Additional information has been provided and TfL have confirmed that they have no outstanding objection to the development.

Access and Parking

4.1.8 Although the access points to the development are acceptable, TfL recommends minor changes are made to allow better turning patterns. These could be included as part of the detailed design.

4.1.9 TfL agrees that the 341 proposed car parking spaces for the development in accordance with the London Plan policy 6.13. The 301 car parking spaces (including visitor spaces) allocated for the residential units equates to 0.6 spaces per unit and TfL is satisfied with this figure.

4.1.10 The proposed Electric Vehicle Charging Points making 20% active and 20% passive provision for residential parking as well as 20% active and 10% passive for all other parking is welcomed and in accordance with the London Plan policy 9.13. This should be secured by condition. The applicant proposes that 10% of the total parking will be designated Blue Badge holders, which is also in accordance with the London Plan and therefore welcomed by TfL.

4.1.11 TfL welcomes the proposed cycle parking for the residential, retail, employment and community development; the 656 proposed cycle parking spaces are in accordance with the London Plan policy 6.9. Secure storage should be provided for all cycle parking, additionally showers and changing facilities should be available on site for commuters to use.

Public Transport

4.1.12 No objection is raised in terms of bus capacity following the review of additional information provided.

Pedestrian

4.1.13 TfL welcomes the submission of a pedestrian (PERS) audit and expects the Council to agree to implement some of the improvements identified.

- 4.1.14 TfL suggests that the proposals refer to the planned Legible London signage in the immediate vicinity of the site. Legible London is a way finding initiative to encourage walking and cycling and it should be noted that the Queensway area (Ponders End- Southbury Road Station) is being included as part of the Ponders End improvements

Travel Planning

- 4.1.15 The Travel Plan failed the ATTrBUTE assessment as the baseline mode splits and information on securing the Travel Plan need to be included. However, TfL is content for the Travel Plan to be subject to planning condition.
- 4.1.16 TfL considers the Delivery and Servicing Plan and Construction Logistics Plan submitted with the application to be acceptable and should be secured by condition.
- 4.1.17 The Framework Parking Management Plan is welcomed though TfL would have expected a statement on how the residential visitor parking was going to be managed.

Environment Agency

- 4.1.18 The Environment Agency advise that following the submission of an amended Flood Risk Assessment (FRA) they raise no objection to the development subject to conditions to address surface water drainage.

UK Power Networks

- 4.1.19 UK Power Networks have advised that in order to protect the electricity equipment and rights on the development land, they object to the application unless suitable safeguards are put in place to maintain electricity supplies to the local area.
- 4.1.20 The applicant has confirmed that appropriate safeguards will be put in place and further discussions would take place with UK Power Networks to ensure this prior to the commencement of development on the site

English Heritage

- 4.1.21 English Heritage advises that they do not wish to offer any comments and that the application should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.

English Heritage (Archaeology)

- 4.1.22 English Heritage (Archaeology) advises that the application site lies within one of the Borough's Archaeological Priority Areas. Roman and prehistoric spotfinds have been made on Ponders End High Street and to the south and west.

- 4.1.23 They are unclear from the submitted Heritage Statement as to whether any consideration of the heritage value of the older buildings outside the campus has been made, such as 200-202 Ponders End High Street. Along with structures proposed for demolition such as the Metallurgy Building, there may be benefit in further assessment and recording in order to preserve heritage value.
- 4.1.24 It is unclear from the submitted archaeological material as to the extent of any modern below ground disturbance at the site. In view of the potential for important remains to be present, they advise that a condition be attached to any planning permission to secure archaeological field evaluation any appropriate mitigation works.

Twentieth Century Society

- 4.1.25 The Society advise "This is the second application to be submitted on this site for the conversion of the grade II listed Broadbent Buildings to residential use and the redevelopment of the wider site for residential-led mixed use. The Society raised objections to the previous listed building consent application (application ref: P12-00733) and full planning application which included the loss of the entire original Crittall window system, the demolition of the caretaker's cottage and the additional storey to the central link building.

" This outline application and listed building consent application addresses the Society's concerns regarding the windows by seeking to retain and repair the original glazing wherever possible, the retention and re-use of the caretaker's cottage and the omission of the infill storey. As such we welcome this heritage led approach to the Broadbent Buildings and do not wish to raise objections to the listed building consent application".

Thames Water

- 4.1.26 Thames Water raises no objections to the development in terms of sewerage or water infrastructure.

Traffic and Transportation

- 4.1.27 Traffic and Transportation note that this is an outline application with one of the matters-access- being reserved. The proposal is for:

- A maximum of 408 residential units
 - 2,141sqm of commercial/live work (B1)
 - 427sqm of community use (D1)
 - 761 sqm of retail (A1-A4)
-
- The application is accompanied by a Transport Assessment, Transport Assessment Review-Technical Response No1, Multi-storey Indicative layout 13 01 08_ KCA sketch, PERS Audit (Pedestrian Environment Review System), Stage 1 Safety Audit, Servicing Management Plan, Framework Parking Strategy Plan, Framework Travel Plan and a Construction Logistics Plan.
 - Comments outlined below are based on the following drawing 205_A_D_100_01 revision 06 "Illustrative Information", 30/10/2012 Plot B6 multi-storey car park, indicative sketch layout 13 01 08 KCA sketch.

- The site was formerly used as one of the campuses for Middlesex University.
- The PTAL of the site is 3 which is classified as being moderate and indicates a medium level of accessibility to access to the public transport facilities.
- Approximately 311 parking spaces will be provided for residential units, 27 for retail, 3 for community, 10 for employment and 47 parking spaces (however Transport Assessment (TA) quotes that only 30), will be re-provided for Enfield Enterprise.
- It is proposed to retain the existing multi-storey car park. The existing access from the north western end of the site will be retained and modified. A new vehicular link is also proposed from High Street via College Court.
- The new roads within the site will be constructed in form of shared surfaces and carriageways with separate footways. Whilst the internal roads will not be adopted the developer will still be required to enter into section 38 and 278 agreements in relation to the new access off High Street.

Public transport accessibility

4.1.28 The site has an estimated Public Transport Accessibility Level (PTAL) of 3 which equates to an average level of accessibility to public transport. It is within a short walking distance of 8 local bus services (nos 279, 349, 377, 491, 121, 191, 307 and 313) located on High Street (A1010) and Southbury Road linking the site with the wider area (i.e. Edmonton, Oakwood, Potters Bar, Enfield town centre, Waltham Cross, etc). The site is also within a walking distance of Southbury Rail Station, with three services per hour during the morning peak period towards Central London/Cheshunt. Although outside the PTAL walking distance, the site is also within 1.2km of Ponders End Rail Station, which is on a different line. It is therefore accepted that the site is well served by public transport and is accessible to a range of local amenities and facilities by modes other than the private car.

Pedestrian Access

4.1.29 The proposals show an overall improvement to the current pedestrian access arrangement which is acceptable and welcome as it forms a fundamental part of any new residential schemes seeking to secure pedestrian permeability into and through the site. The following pedestrian links are proposed:

a) An improved pedestrian access from Queensway to the west of the site, with footways on both sides measuring approximately 2.5m in width along the western and eastern boundary of the new access. Although the width seems to meet the minimum standards, at least one of the footways should be designed to a 3m width to reflect the large scale and nature of the proposals, but without compromising the width of the access road.

b) The design drawings show a new pedestrian link from the multi storey car park, which improves permeability through the site by lining the parking spaces located in the multi-storey car park with the residential properties within the site. It is unclear however if a through route for all pedestrians from Queensway is proposed or only those parking in the multi-storey. Nonetheless a careful approach is required in its design to make sure that pedestrians feel safe sharing it with motorised traffic. An adequate and detailed design will be secured by a planning condition.

c) An improved link to the south of the site from High Street along College Court with a raised table pedestrian crossing. The width varies between 3m and 6m which is considered acceptable. The exact design will be secured by a planning condition.

d) A new link to the east of the site between the mosque and the former pub (approximately 8m wide). This would need to be dedicated as a PROW (public right of way) to secure pedestrian permeability through the site.

e) A modified pedestrian crossing on High Street connecting the site with the recreation grounds on the opposite side of the highway. The crossing has been relocated further to the north which does not appear to be on the pedestrian desire line however the exact location, which caters for pedestrians and does not undermine highway safety, will be secured under s278 agreement.

f) There is an opportunity to open up a pedestrian route between the eastern side of the multi-storey car park and no 20 Queensway connecting the site with Queensway which will further improve permeability. The link however would need provision of adequate lighting and security by improving overlooking. The link would need to be dedicated as PROW (Public Right of Way). This will be secured by a planning condition.

4.1.29 Most of the footways within the site meet the standards set out within the Department for Transport Manual for Streets (MfS) document. . However to meet the standards of a homezone the speed levels within the development should be kept at 15mph. The details of design and construction of the new footways will be secured by planning conditions.

4.1.30 The proposed development will increase footfall on the existing footways of Queensway, High Street and Kingsway. There is however a concern that the scheme, by creation of a new lay-by bay on High Street, can negatively affect the width of the footway along this section of the highway. Therefore a condition requesting maintaining the footway along High Street at a minimum standard width of 3m around the loading bay to provide a comfortable and safe walking environment should be secured under S278 and S38 Agreements.

4.1.31 To assess the impact and identify any improvements needed to the local pedestrian environment the applicant carried out the audit of local footways between the site and local amenities. The following pedestrian links have been assessed: Southbury Road between Anglesey Road and High Street (S), Kingsway between Queensway and Lincoln Road, Lincoln Road between Derby Road and Concord Road, Queensway, Derby Road between Loraine Close and High Street, High Street between Derby Road and Nags Head Road. The findings revealed the following issues:

- No step free access available at Southbury railway station;
- Pedestrians afforded no priority at the island crossing outside Southbury railway station;
- No pedestrian green phase at South Street Junction;
- Vehicles parked on the pedestrian footway for the length of Lincoln Road obstruct pavement pedestrians despite signs prohibiting this;

- a lack of signage and information provision along all links assessed;
- Bus Stop A, located on Southbury Road to the north-west of Kingsway junction, does not provide a shelter and is lacking in detailed public transport information as well as local information;
- A lack of tactile paving at pedestrian crossing located at the entrance of the former university entrance with the surfacing being uneven and in poor condition representing potential trip hazards to pedestrians.

4.1.32 Whilst it would be unreasonable to expect the applicant to cover the costs of all identified pedestrian improvements needed in the area, due to the scale of the development some contributions to improve pedestrian facilities in the area will be required. The minimum contributions should cover the following:

- costs of introducing new pedestrian signage/legible London in the area covered by the audit
- costs of improving facilities at the Southbury Bus Stop A
- cost of works to university entrance
- footway improvements in Queensway

4.1.33 The works will be secured by condition and through a s278 Agreement as appropriate.

Vehicular Access

4.1.34 The proposals show an overall improvement to the current vehicular access arrangement and traffic connectivity, by means of introducing a home zone design, reducing traffic speeds by the way of traffic calming features, and designing the internal roads to adoptable standards, which is acceptable. As the access is one of the reserved matters, a Stage 1 Safety Audit (RSA) was requested as part of the submission.

4.1.35 The following vehicular access points are proposed:

a) An improved, 6.5m wide, two-way access, with pedestrian crossing, in form of a priority junction to the north-west of the site from Queensway. In general, the width of the access appears to meet the adopted standards for a two way traffic, however the design details, like appropriate radii, pedestrian crossing etc, will be secured by s278 agreement and planning conditions.

b) A realigned, two way priority junction of College Court with High Street, with pedestrian crossing, involving a raised table to signify the start of the homezone. This is regarded as a major change to the current arrangement with the likely impact being on the bus services and delays to traffic on the High Street corridor. The RSA identified the potential problems with the impaired visibility of approaching traffic and of traffic emerging from the nearby service road. To make sure that the design does not compromise road safety, stage 2 and 3 Road Safety audits will be secured by a planning condition and S278 Agreement.

c) A two way working access into/from the multi-storey car park from Queensway. A one way access through the car park will be available from the site towards Queensway. The principle is acceptable however the design details will be secured under a planning condition and The Road Safety audit

4.1.36 With all the proposed changes to vehicular accesses mentioned above, it is equally important to ensure that adequate pedestrian and carriageway visibility is secured. For that reason, it is necessary that a condition requiring that all access points meet the guidance contained in Manual for Streets is attached to the planning decision together with a requirement that the applicant fund any necessary junction protection markings through S278/S38 Agreements.

Internal road layout & servicing

4.1.37 The proposed internal road hierarchy does not, in general, prejudice the design of a layout that caters for vehicles and is permeable for pedestrians. The details will be secured by appropriately worded conditions and S278 & 38 Agreements.

4.1.38 In terms of servicing arrangements, two new loading bays, with one being located on College Court and one on the High Street, having the capacity to accommodate a 7.5 tonne box van are proposed for the retail units with the rest of the units having to be serviced on street. Whilst the lay-by bay on High Street could potentially impact on operation of the nearby bus stop, the exact design details can be agreed with the Highway Authority under s278 agreement.

4.1.39 Due to the uncertainty of the end user, it is impossible to identify what type of box vans are likely to service the retail units and whether the proposed size of the loading bays will be adequate. There is also a concern that the turning space for the bay located on the College Court access will encourage service vehicles to pass through the whole site if the turning space is obstructed. For that reason it is necessary that adequate signage and enforcement measures are introduced together with dedicating circa 100 m of the College Court access up to the first junction within the site as adopted highway. A condition requiring the submission of a full Servicing Management Plan should also be attached to the planning permission.

Access to buses

4.1.40 The traffic generation assessment reveals that 21% of all trips will be undertaken by bus therefore it is important that the surrounding bus stops are assessed in compliance with TfL accessibility standards (TfL 'Accessible Bus stop design guidance, 2006'). The applicant met that requirement as part of the PERS audit. It is assumed that TfL will provide further comments on the matter.

Cyclists

4.1.41 The current infrastructure for cyclists in the area is limited to the existing cycle paths on parts of Southbury Road, Nags Head Road and toucan crossing facilities on approach to the Hertford Road/Nags Head Road/High Street/Southbury Road. The Council is investing heavily to improve the environment for cyclists by works planned for the next few years, covering Derby Road to the east along Ponders End Recreation Grounds, South Street

4.1.42 No contributions towards improving the infrastructure for cyclists outside the site are proposed as part of this application. However, it is considered that the scheme, by designing the internal road network to homezone standards, maintaining the width of the roads to allow sharing with cyclists and opening up and connecting the University campus site to the High Street to the east, positively contributes towards improving safety of cyclists currently using Queensway and sections of the High Street, by facilitating access through the site.

Car Parking

4.1.43 a) Residential- The car parking provision for a residential element presented in the Transport Assessment is based on 391 units and the following mix:

Dwelling Type	Number of Units
1 bed	66
2 bed	100
3 bed	144
4+ bed	81
Total	391

Table 3.2: Dwelling Type (Illustrative Scheme)

4.1.44 When applied to the London Plan standards this would work out the following requirement:

66 x 1 – bed units: between 0 and 66
 100 and x 2 – bed units: between 0 and 100
 144 x 3 – bed units: between 144 and 216
 81 x 4 – bed units: between 122 and 162

4.1.45 The required provision would therefore vary between a minimum of 266 and a maximum of 544. Given that the accessibility of the site is rated as 3 (average), then the provision in addition to the minimum standard should be required. According to the additional information submitted (i.e. *Multi-storey Indicative layout 13 01 08_ KCA sketch*) 311 car parking spaces are proposed, of which 99 will be in the multi-storey car park, 45 within the structure of the building fronting onto High Street, and the remaining 167 spaces located on street, a ratio of 0.795. In addition to that, another 20 spaces are proposed for visitors (the TA fails however to mention where these spaces will be located) bringing the total residential provision to 331 car parking spaces.

4.1.46 It is noted that since the submission of the TA the maximum number of units has increased from 391 to 408. To reflect that, the applicant has provided further information in relation to the car ownership in Enfield by using the Census data from 2011 for the whole Borough (Table 1 below) to justify the proposed number of car parking spaces. Whilst this approach could be acceptable in principle, there is a concern that the data is not ward specific and does not accurately reflect the car ownership statistics in the Ponders End area. In comparison, the Ponders End 2001 car ownership statistics reveal a higher, 90%, car ownership.

% of Car/Van Availability					
No Car or van	1 car or van	2 cars or vans	3 cars or vans	4 cars or vans	
32.5	43.3	18.3	4.4	1.5	100.0

Table 1: Car and van ownership in Enfield

4.1.47 As it was mentioned above the revised outline application is for 311 car parking spaces and a maximum of 408 units (parking ratio of 0.762). The applicant suggests that the proposed level of parking is compliant with the Planning Brief and Policy 6.13 of the London Plan, which “wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision”. However, the recent guidance in NPPF highlights that local authorities should not restrain car ownership. In addition, a review of Census 2001 data shows that for Ponders End Ward, the car ownership is an average 1 per household, which is high and means that the proposed parking provision might not meet the demand. It is also considered that without stringent control the lack of on site parking may impact on the surrounding streets. Therefore, should this application be approved, which shows a lower car parking provision than the one identified by the Census data, it is imperative that the improvements to the sustainable modes of transport as well as a requirement for consultation on and implementation of a Controlled Parking Zone are secured. In order to avoid parking overspill it is necessary to:

- cap the parking ratio at no less than 0.76 for residential element (excluding visitors spaces and parking for other uses on site);
- the multi storey car park only used by those flats which are the closest;
- 5 % of all residential units provide parking for motorcycles and 10% of all spaces are dedicated for disabled

4.1.48 b) Enfield Enterprise- The TA states that 30 car parking spaces will be maintained for Enfield Enterprise in the multi storey car park. However, it was confirmed with the Enfield Enterprise that in fact the current number of parking spaces is 47 with all the spaces being constantly in use. The access to these spaces is provided off Queensway between the two buildings. It is therefore necessary that minimum provision, their accessibility and size, are secured by planning condition.

4.1.49 c) Employment (2,782sqm) – The proposal includes 10 car parking spaces which is considered to be an under provision in the light of the moderate PTAL and the fact that Enfield is an outer London Borough. Whilst a robust Travel Plan could address some of the shortage by encouraging use by sustainable modes of transport, it is unrealistic to expect, particularly due to the site location that the demand will be similar to that of other Inner London Boroughs.

4.1.50 According to the London Plan B1 uses should provide 1 parking space for 100-600 sqm which leads to a requirement of between 28 and 5 parking spaces. The London Plan states that for the Outer London locations more generous standards should apply (see Policy 6.13). Whilst the Council’s standards contained the UDP have expired, a provision of 1 parking space

per 200 sq.m is considered appropriate . This lies mid range in the London Plan standards, reflecting the characteristics of the Borough. A requirement of circa 14 parking spaces would therefore need to be accommodated.

- 4.1.51 d) Retail (761 sqm, A1-A5) - No additional provision is proposed above the existing 27 current College Court car park spaces. The London Plan parking standards for sites located in PTAL 2-4 require a provision of between 1 space per 30 -50 sq.m, depending on the end user. The proposal appears to meet this criterion.
- 4.1.52 e) Community use (1,061sqm D1 use) - 3 parking spaces are proposed. The TA states that two of the spaces will be located near the Broadbent building, and one space located on street in proximity to the community use associated with the mosque. As there are no parking standards within the London Plan for this type of use it is difficult to assess at this stage if the proposed level of parking spaces will suffice. The number of parking spaces should however cater for any predicted demand. This can be achieved by incorporating into the design the Framework Parking Strategy Plan which will ensure that parking is adequately shared between all uses on site.
- 4.1.53 f) Car Club provision- As this is an outline application the details of the car club bays have not yet been finalised, i.e; exact location of the bays, number of bays. However initial talks with the car club provider in Enfield (Zip Car) require that as a minimum the applicant should dedicate at least 2 bays for the car club and cover 2 year's membership and driving credit for each of the residential units. This provision will be secured by way of condition and/or legal agreement.
- 4.1.54 g) Electric charging points will be provided on the basis of 20% active and a further 20% passive. This will be secured by condition.
- 4.1.55 g) Parking layout- The exact details relating to the parking layout (i.e. size of bays, location, turning space etc) are not subject of this outline application so cannot be assessed in greater detail. However, as the internal roads will not be adopted, there is a potential for informal parking to occur within the site which may result in double parking and service vehicles not being able to gain access. In order to address this issue a Full Parking Management Plan demonstrating preventive measures against illegal parking as well as explaining spaces assignment will need to be secured by condition.

Cycle Parking

- 4.1.56 The proposed cycle parking provision meets the requirements of the London Plan Early Minor Alterations, February 2012 and is acceptable:
- B1 use- at least one space per 150-250 sqm of employment floorspace, which based on the 2,141 sqm proposed will result in between 14 and 9 cycle parking spaces.
 - A1-4 use- at least one space per 100-300 sqm- between 7 and 3
 - D1 use- at least one space per 10 staff and 10 visitors
 - C3 use- one per 1 or 2 bedroom dwelling for residents and one per 40 units for visitors, one per 3+ bedroom dwelling for residents and one per 40 units for visitors

	Residential	Employment	Retail	Community
Cycle Parking Spaces	616 + 10 visitor spaces	19	6	5

Table 3.3: Proposed Cycle Parking

4.1.57 Whilst the application appears to meet the required criteria it is acknowledged that due to the outline nature of the proposals some of the details are not yet known, i.e. number of staff to D1 use, exact accommodation schedule, therefore it is recommended that the details of design of the storage facilities, number of spaces and their location are secured under a planning condition.

Trip generation

4.1.58 Apart from a gross impact of the proposals, no assessment of traffic impact was undertaken in the TA of the former site use. Whilst it is acknowledged that the previous use had the potential to generate a large number of trips and could be brought back into use at any time without a further planning consent required, it is the peak hours which will have the highest impact on the traffic in the area. Table 2, with the 'existing traffic' data derived from the Transport Assessment submitted with an earlier planning application for Middlesex University Campus site, compares the anticipated level of traffic generated by the proposed development and the previous educational use on the site:

	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Proposed	23	102	67	34
Existing	75	9	27	100
Net Change	-52	+93	+40	-66
% change	-70	+1033	+148	-66

Table 2

4.1.59 Although the impact of the development may be less over certain peak periods, at pm peak time there is up to a 148% increase in vehicles arriving at the site at the PM peak and 1033% leaving the site at AM peak. This would be expected partly because of the nature of the change of use; although the university could accommodate 1000 students, the direction of the traffic is likely to vary significantly from that of a residential scheme as students would have arrived in the morning and departed in the evening. There is no acknowledgement of this included in the TA.

4.1.60 The predictions for the proposed development are based on the TRAVL database with selected sites containing only private housing. The sites selected are shown below:

a) Residential

- 104 units in Barnet, parking: 120, PTAL 3
- 276 units in Sutton, parking: 321, PTAL 4
- 104 units in Brent, parking: 112, PTAL 2

4.1.61 There is no additional information provided on mix of these dwellings such as flats or houses, so it not possible to comment on the similarities between the sites chosen and the proposed development. It is noted however that there are the following similarities between the subject site and the sites from TRAVL, i.e. location in outer London, surveys only 10 years old, similar PTAL range, similar parking ratio, so it is therefore correct to assume that the trip generation characteristics will be similar. The combined trip rate for both the flats and the houses is calculated to be the following:

Mode	Am peak In	Am peak Out	Pm peak In	Pm peak Out
Car Driver	21	83	56	27
Car Passenger	3	19	11	7
Motorcycle	0	0	1	1
Pedestrians	14	34	25	9
Cyclists	0	3	3	0
Bus	21	51	37	14
Rail	12	30	22	8
Total people	71	220	153	65

Table 3 based on 408 units

6.1.62 The trip generation figures seem reasonable. The selected sites seem to reflect the level of car ownership that would be expected in the proposed development given that 311 parking spaces are being provided. It is therefore considered that the predicted traffic generation is robust.

b) Retail

4.1.64 No trip assessment has been undertaken for the proposed 761sqm GFA of retail as there is currently approximately 800sqm GFA of retail operational on High Street resulting in a net decrease of 39sqm GFA which is deemed acceptable.

c) Community use

4.1.65 For robustness purposes only nursery sites, which have the biggest traffic impact, were selected. It is however noted that due to the limitations of the TRAVL database no similar sites to the existing one were available with both car parking provision and a similar PTAL. The data appears to be robust.

Wolverton nursery, Enfield, 480 sqm, PTAL 1, Parking 20
 Bush Hill Park Day Nursery, Enfield, 546sqm, PTAL 3, Parking 0
 Fareacres Nursery, Redbridge, 302sqm, PTAL2, Parking 1

4.1.66 The traffic generation is presented in Table 4 below:

Mode	Am peak	Pm peak
Car Driver	24	29
Car Passenger	15	12
Pedestrians	2	1
Cyclists	1	0

Bus	2	2
Rail	1	0
Total people	45	44

Table 4

d) Employment

4.1.67 Again due to the limitations of the TRAVL database and unknown end user at this stage, a combination of B1 uses has been used to assess the trip generation for B1 (design studio and office space). For the B1 'Studio' category data from the following site was used:

Wimbledon Art studio, Merton, 7400 sqm, PTAL2, Parking 80

4.1.68 In addition to the above studio, 600sqm GFA of office space has been assumed:

Bed Zed, Sutton, 542sqm, PTAL 3, parking 0

4.1.69 The predicted number of trips contained in Table 5 below appears to be reasonable:

Mode	Am peak	Pm peak
Car Driver	14	19
Car Passenger	1	1
Pedestrians	2	3
Bus	2	3
Rail	2	1
Total people	21	27

Table 5

4.1.70 Total trips

Mode	Am peak	Pm peak	Total peak	Percentile %
Car Driver	143	131	274	43
Car Passenger	38	31	69	11
Pedestrians	51	37	88	14
Bus	76	56	132	21
Rail	45	30	75	11
Motorcycle	0	2	2	0
Total people	353	287	640	100%

Table 6

Travel Plan

4.1.71 The development has the potential to employ a significant number of staff and generate a substantial number of vehicle movements however the measures proposed in the Framework Travel Plan, submitted together with the application appear generalized and are lacking a clear and robust action plan

with their implementation. As a minimum the following matters should be secured under by condition and through the submission of a Travel Plan:

- costs of consultation on the CPZ
- a minimum of 2 car club bays available to the public at large and costs of at least 2 year membership for staff and residents of the development
- a full Travel Plan prepared in accordance with TfL guidance *Travel Planning for New Development in London, 2010 for residential*
- Measures should be delivered site-wide, responsibilities for the delivery and funding of these and targets with appropriate timescales. The targets outlined should be specific for years 1, 3 and 5.
- Percentage mode share targets should be provided for walking, cycling and public transport, as well as single occupancy vehicle use. These should be firmed up now and refined further on completion of the first travel survey, and agreed with Enfield Council's transport team.
- The specifics of the Travel Plan for non-residential units will be to be secured by condition.

Transport modelling

4.1.72 The traffic impact of the proposed development on the operation of the local road network was assessed using PICADY (priority junctions) and LinSig (signalised junctions) software. The extent of the network assessed included the following junctions:

- Southbury/Kingsway
- Kingsway/Queensway
- High Street/Queensway
- Kingsway/Lincoln Road
- College Court Access
- Queensway Access
- A110 Southbury Rd / A1010 High Street
- A1010 High Street / South Street / Derby Road

4.1.73 The above junctions have been modelled for a design year of 2015, both with and without the proposed development. It was agreed with TfL and the applicant that instead of applying the traffic growth factor, the better and more robust approach was to use the traffic data available for the committed developments in the area (i.e. Oasis Academy, Cuckoo Hall Primary School, Robbins Hall, Kier development, 173 South Street, 265 High Street and 229-245 High Street).

4.1.74 The TA was produced initially on the basis of 560 units reflecting the maximum number of units that the sites were identified as potentially accommodating in the Ponders End Central Planning Brief. However, the application has only ever proposed a total of 408 units and therefore additional modelling was submitted. The Transport Addendum does not however allow for a proper assessment and conclude the likely impact of the development. The original modal outputs are missing and no information was submitted in relation to the validation of the Nags Head/Southbury junction.

4.1.75 Nonetheless, the network appraisal appears to show that the strategic highway network including Southbury Road/A1010 High Street junction and A1010/South St/Derby Rd/Lincoln Rd junction surrounding the site is currently operating at or over capacity with a high degree of saturation and large

queues during the future year scenario without the proposed development. The addition of the development related traffic in 2015 and 2020 is shown to further exacerbate these problems; however the percentage change in traffic levels, the degree of saturation and queue lengths is relatively small. In the light of the information currently available, it is considered that as this scheme proposes significantly fewer dwellings than proposed in the earlier planning application submitted for this site, that whilst the development will have an impact on both signalised junctions, that this impact, as with that earlier scheme should not materially compromise operational effectiveness

- 4.1.76 The information contained in the Transport Addendum seems to indicate that there will be a 5% increase in traffic flows on the High Street arm (A1010) in traffic heading northbound into the junction of the A1010/A110 Southbury Rd with the most affected arm being Southbury Rd left/Ahead and High Street (S) Ahead/left during Pm Peak times. On the other arms of this junction the development generated flows amount to less than 2% of the flows but contribute towards materially compromising this junction.
- 4.1.77 The junction of A1010 High St/ South St/ Derby Rd sees development flows contribute 1% on all arms with the High St South arm experiencing a 6% increase. The most affected arms of the junction are High St (S) Left Ahead, Lincoln Road Ahead Right U-turn Left and South Street during PM peak times exceeding the capacity of the junction in 2020.
- 4.1.78 Whilst it might be argued that the impact of this development generated traffic is not significant enough on its own to warrant junction improvements as the Council is already aware of traffic capacity issues in this area and plans are being drafted to improve the situation along the A1010 corridor. Nonetheless, it is considered appropriate that a major redevelopment scheme such as this will require off-site improvements to help address/mitigate the impact and ensure sustainable modes of travel are supported and assist the integration of the site into the locality. These include measures to support walking, cycling and use of public transport. Through the Council's Regeneration and Transportation initiatives funding continues to be steered and sought for such purposes - e.g. South Street footway improvements, enhanced pedestrian/cycle access through Ponders End Park, bus stop accessibility, Greenway cycle routes, etc - and further funding has recently been committed by TfL to support major improvements to this locality in Ponders End. This funding will now be used, in part, to greatly improve Ponders End and support measures to facilitate this development.

Accident statistics

- 4.1.79 The submitted data included all the major junctions mentioned above and covered the period of the 1st March 2009 to the 29th February 2012
- 4.1.80 The analysis of one of the junctions (A1010 High Street j/w A110 Southbury Road) revealed that although slight in nature some four out of the five accidents involved pedestrians and cyclists and that the likely cause was poor visibility and incorrect judgement.
- 4.1.81 Whilst the frequency of accidents in five years is not untypical of junctions carrying the same type and similar volumes of traffic it is still considered that a significant development as this promoting use of more sustainable modes of

transport like walking and cycling should contribute towards improving pedestrian safety in the area.

Construction & Phasing

- 4.1.89 A draft Construction Logistics Plan (CLP) was submitted together with the application. The document was prepared in accordance with guidance provided by Transport for London (TfL) – *'Building a better future for freight: Construction Logistics Plans'* which is acceptable.
- 4.1.90 The report emphasizes that due to the early stages of the scheme a contractor is not yet appointed so the details of construction and phasing should be allowed flexibility, which is acceptable. The report however indicates that the development of the site will happen in two phases:
- 1st phase will involve the development of the plot fronting onto High Street. This is expected to be operational by 2015 with building work commencing circa 2014.
 - 2nd Phase 2 will involve developing of the remainder of the former campus land and is expected to be complete by 2020 with construction between 2015 and 2020.
- 4.1.91 The main access point for construction traffic is proposed via an existing priority junction off Queensway with A1010, which is acceptable as it would minimise the impact on residential properties along Kingsway. A turning movement out/in from A1010 at the junction with Queensway was confirmed by a swept path drawing showing a 20m long mobile crane.
- 4.1.92 The CLP admits that the existing gated access into the site from Queensway would need to be widened however no swept path drawings have been submitted to confirm whether the land necessary for access falls within the red line boundary. Furthermore, any construction works would also require a temporary traffic regulation order. The CLP has failed to submit the swept path drawings of the internal road network so was impossible to determine if sufficient space within the site exists for vehicular movement and turning in order to allow all construction traffic to access and exit the development site in a forward gear.
- 4.1.93 Although there are concerns with the lack of details for construction & phasing and its impact on the nearby highway network, it is typical for an outline application and it is believed that these can be satisfactorily secured under planning condition.

Education

- 4.1.94 The Director of Schools and Children's Services advises that based on the formula set out the S106 Supplementary Planning Guidance a development of 408 units as proposed, with the mix indicated within the supporting documents would generate a requirement for a contribution of £2,216,156.00 towards local education provision, including pre-school care.

Health Safety & Pollution Officer

- 4.1.95 The Health, Safety and Pollution Officer advises:

- 4.1.96 *Air Quality*- The air quality assessment submitted has adequately assessed the impacts of pollution sources upon the development in terms of traffic pollution and there are no issues in this regard.
- 4.1.97 During the demolition/construction phase of the development there is a risk of dust being generated and causing nuisance issues to surrounding business and residential premises. For this reason conditions requiring control of dust on site will reduce the risk of dust issues occurring.
- 4.1.98 *Noise* – The acoustic assessment is sufficient in detail and highlights that noise control measures will be required for properties on the eastern border with the A1010 Ponders End High Street. The noise during the night would put these properties in Category C/D under the former guidance within Planning Policy Guidance Note 24 and B/C during the daytime. Other properties along the northern boundary will fall into Category B. In order to protect future residents (in particular those at the eastern and northern boundaries) from undue disturbance from the local noise environment, the report's author recommends triple glazing with alternative ventilation methods. A condition is recommended to ensure details are submitted of the noise mitigation measures to be incorporated.
- 4.1.99 During the development process there is a likelihood of noise and disturbance to surrounding properties. Conditions are recommended to require the submission of a construction management plan to minimise the impact.
- 4.1.100 *Contaminated land* – The contaminated land report builds upon an earlier report and sufficiently explores the findings of the previous investigation. In particular the report highlights the presence of slightly elevated levels of heavy metal and hydrocarbons in the made ground spread across the site. The presence of the contaminants at elevated levels requires that some site remediation is undertaken. The majority of the site will be hard standing/built upon and therefore placing a physical barrier between the contamination and future site users. However, there will still be a risk from any areas of soft landscaping and gardens as they will present a pathway for the contamination to reach the site users. For this reason, any contamination within the soft landscaping and gardens will require remediation and conditions to cover this are recommended.

Urban Design Team

- 4.1.101 The Urban Design Team advise that the proposal represents a good use of the site, both in terms of densities, layout, quality of accommodation, and the response to the listed building. The inclusion of land to the High Street allows a comprehensive approach to the regeneration of the wider area to be adopted, with significant success.

Biodiversity officer

- 4.1.102 The Biodiversity Officer confirms that the applicant has provided sufficient information for the Council to determine that if appropriate mitigation is provided, the proposals are unlikely to have an adverse impact on protected species and have demonstrated that such mitigation even in a 'worse case' scenario can be provided within the context of this outline scheme. They

have also demonstrated how the proposed development complies with planning policy, wildlife legislation (in particular The Habitat Regulations) and recent case law in relation to European protected species. As such, subject to conditions requiring the submission of further details in the form of an ecological impact assessment, outline ecological mitigation and enhancement strategy, outline landscaping scheme and management plan, updated ecological assessments prior to each phase of development, there are no objections to the proposals.

Conservation Officer

4.1.104 The Conservation Officer advises that the scheme responds to the significance of the building and works with its fabric and character. She recognises that some harm will occur but that that is justified in terms of finding a viable new use to ensure the building's future.

Conservation Advisory Group

4.1.105 The Group considered the application at their meeting of 28th November 2012 and support the proposals

4.2 Public Consultation

4.2.1 Public consultation on the redevelopment of this site has taken a number of forms:

- The site is included within the area of land the subject of the Ponders End Central Planning Brief, on which there has been extensive public consultation, which in itself has led out of the extensive consultation on the Ponders End Framework for Change.
- Pre-application consultation undertaken by the applicant, including the holding of two public exhibitions and the issuing of approximately 900 consultation letters
- In connection with this planning application over 900 individual letters have been issued to adjoining and nearby properties and local groups.
- Site notices have been displayed on the local roads surrounding the application site.
- A Planning Panel was held on 3rd December 2012.

Ponders End Central Planning Brief consultation

4.2.2 Between 21st July and 5th September 2010 the Council's Neighbourhood Regeneration team consulted on the draft Ponders End Central Planning Brief. This document focuses around the Middlesex University Campus site and identifies the opportunity for redevelopment of the site for residential and employment uses with up to 450 new homes. This was an intensive period of consultation work targeting the whole Ponders End community as stakeholders. The process involved extensive communication, consultation and in-depth engagement, and Special Interest Groups were identified to ensure that the response was representative of the community as a whole. Various methods were used, including delivery of materials, press and website materials, presence at community events, outdoor roving exhibitions,

public meetings, one-to-one interviews, meetings and focused workshops with particular groups.

Consultation on this application

4.2.3 As a result of public consultation on this planning application 5 letters of objection have been received. The objections raised can be summarised as:

- Exclusion of the Mosque - which is not purpose built and not large enough. A larger purpose built mosque could be provided. It would allow for a better overall design solution rather than having to work around a fixed constraint.
- Exclusion of properties in the area around the junction between High Street and Queensway (Nos 232-244 High Street) – these are located at an important intersection and would benefit from a well considered regeneration scheme.
- No justification why these properties not included. Represents a missed opportunity and therefore proposals cannot be considered to be genuinely comprehensive in nature.
- Part of Upper Lee Valley Opportunity Area therefore any redevelopment should be truly comprehensive in nature and should include the whole of the High Street. The development fails to accord with the emerging strategic policy by not being comprehensive.
- The former Post Office site, High Street – should be included to provide additional development flexibility by providing potential relocation accommodation for displaced businesses
- Extinguishment of a number of viable and long standing local businesses and provision needs to be made for relocation of these to other appropriate locations.
- The businesses along Queensway already have access problems and articulated lorries often have to make difficult turning manoeuvres in the road or park. The introduction of new housing will bring additional people and children which could lead to accidents.
- Insufficient provision being made for car parking which will lead to overspill into local roads to the detriment of residents and businesses
- Insufficient parking provision will mean residents won't want to buy the larger houses and take up the proposed work space. This will mean only those residents who can't choose where they live being placed here resulting in a ghetto style environment
- No account taken of the impact of the development on existing infrastructure
- Discussions should be undertaken with existing businesses in Queensway to allow the whole area to become residential rather than trying to integrate two different areas.

- Alternative route out of Queensway should be considered taking the traffic away from an already congested road. A road connecting Queensway with the access road adjacent to Tesco's could be considered.
- Position of blocks will result in overlooking and loss of privacy
- Proposed new access to High Street will expose rear gardens of Lorraine Close resulting in the loss of security and privacy.
- The proposals involve the loss of the existing car park serving the Enfield Enterprise premises in Queensway. The application advises that 30 replacement spaces would be provided within the multi-storey car park but no details of where these would be located within the car park or on what terms they would be offered. Enfield Enterprise would require at least 45 spaces and for these to be located on the ground floor with a head height to accommodate the vehicles which service their premises.
- The re-provision of car parking would not address the impact of the development on the Enfield Enterprise premises as provision also needs to be made for lorries to turn or reverse safely in order to leave the site, as the car parking area also acts as their servicing facility.
- Concerned about the proposals to turn the existing vehicle access to Enfield Enterprise, adjacent to the multi-storey car park into a pedestrian walkway with shared access. This is not wide enough for the public to share it with vans and lorries.
- Use of the access as a public walkway will impact on security of the industrial units especially at night.
- There is a risk that with the uncertainty over the future timing and implementation of the proposals that tenants on monthly licenses will decide to leave the industrial estate and this will impact on the sustainability of Enterprise Enfield who currently subsidise counselling and advice to unemployed and economically inactive people through the surpluses earned through the premises.
- Opportunity not taken to provide significant employment space in the proposed development. The primary business space proposed is within the listed building which will not be attractive to the local market which needs low value and flexible workspace. To have to apply for Listed Building Consent for any alterations will be a major deterrent to local businesses.
- The site used to provide extensive job opportunities for a wide range of employment types. Every effort should be made to re-provide a similar number of jobs within the development scheme.

Planning Panel

- 4.2.5 A Planning Panel was held on 3rd December 2012 to discuss this planning application. The minutes of that meeting are appended to this agenda.

5 Relevant Planning Policy

5.1 National Planning Policy Framework

5.1.1 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions – an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:

- approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or

Specific policies in the Framework indicate development should be restricted.

5.1.2 The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

5.1.3 The publication of the National Planning Policy Framework adopts transitional arrangements for Development Plan Policies stipulating that for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework. For the purposes of decision-taking, the policies in the Core Strategy, Unitary Development Plan (UDP) and London Plan should not be considered out-of-date simply because they were adopted before the publication of the NPPF. In accordance with paragraph 215 of the NPPF for Policies adopted prior to 2004, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

5.2 London Plan

Opportunity Areas

5.2.1 The site lies within the Upper Lee Valley which London Plan Policy 2.13, supported by London Plan Annex One, identifies as an opportunity area with the potential to accommodate a minimum of 9000 new homes and 15,000 new jobs. The draft Upper Lee Valley Opportunity Area Planning Framework (OAPF) provides strategic guidance for development within the Upper Lee Valley, with the emerging North East Enfield Area Action Plan (NEEAAP) intended to provide more detailed local guidance for Enfield Lock, Enfield Highway and Ponders End.

- 5.2.2 The former Middlesex University campus is identified as a key strategic site within the draft Upper Lee Valley OAPF.

Policies

- 2.13 Opportunity Areas and intensification areas
- 2.14 Areas for regeneration
- 3.2 Improving health and addressing health inequalities
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Children and young people's play and informal recreation
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 3.16 Protection and enhancement of social infrastructure
- 3.18 Education facilities
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 5.15 Water use and supplies
- 5.21 Contaminated land
- 6.3 Assessing the effects of development on transport capacity
- 6.5 Funding crossrail and other strategically important transport infrastructure
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.1 Building London's neighbourhoods and communities
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.8 Heritage assets and archaeology
- 7.9 Heritage-led regeneration
- 7.14 Improving air quality
- 7.15 Reducing noise and enhancing soundscapes
- 7.19 Biodiversity and access to nature
- 7.21 Trees and woodlands
- 8.2 Planning Obligations
- 8.3 Community Infrastructure Levy

5.3 Core Strategy

- CP1 Strategic Growth Areas

- CP2 Housing Supply and Locations for new homes
- CP3 Affordable housing
- CP4 Housing Quality
- CP5 Housing types
- CP9 Supporting community cohesion
- CP20 Sustainable Energy use and energy infrastructure
- CP21 Delivering sustainable water supply, drainage and sewerage infrastructure
- CP24 The Road Network
- CP25 Pedestrians and cyclists
- CP26 Public Transport
- CP28 Managing flood risk through development
- CP30 Maintaining and improving the quality of the built and open environment
- CP31 Built and landscape heritage
- CP32 Pollution
- CP36 Biodiversity
- CP40 North East Enfield
- CP41 Ponders End
- CP46 Infrastructure contributions

5.4 Unitary Development Plan

- 5.4.1 The Unitary Development Plan (UDP) was adopted in March 1994. Under Section 38 of the Planning and Compulsory Purchase Act, the Council's existing UDP policies were automatically saved for a three year period. This ended on 27th September 2007. However, as from that date, the Local Planning Authority has received a Direction from the Secretary of State confirming the policies that have been retained are not considered to be in conflict with any more subsequent planning policy or guidance. In this regard, the policies referred to below are covered by the Direction from the Secretary of State and remain part of the development plan for Enfield and remain material considerations to be taken into account when determining planning applications.

- (II)GD3 Design
- (II)GD6 Traffic implications
- (II)GD8 Access and servicing
- (II)H8 Distancing
- (II)H9 Amenity space

5.5 North East Enfield Area Action Plan

- 5.5.1 The North East Enfield Area Action Plan (NEEAAP) Issues and Options Report was issued in 2008. Following consultation, this led to the production of the Preferred Options Report in March 2009, when work was put on hold to focus on the progression and adoption of the Core Strategy. Since this time there has been significant change. The Council has now adopted the Core Strategy, which provides the strategic direction for North East Enfield. The Ponders End Framework for Change was published in 2009 and the Ponders End Central Planning Brief has been adopted by the Council. At the regional level, the Mayor of London published the new London Plan 2011 and consultation on the draft Opportunity Area Planning Framework (OAPF) for the Upper Lee Valley, November 2011. In the light of this, the Council has

now produced the North East Enfield Area Action Plan Interim Direction Document. This Document has been the subject of consultation and responses are presently being considered with a view to preparing the Proposed Submission AAP and consulting thereon in Summer 2013.

5.5.2 The policy approach set out in this document identifies the priorities for the Ponders End Central area, which includes the application site, as:

- comprehensive area based approach to enable transformation of the former Middlesex University and cluster of sites on the High Street as a focus of social life and activity, with new and improved shopping, civic and employment uses as well as providing a choice of new homes.
- A range of housing types and mix
- A vibrant High Street with a high quality public realm
- The Middlesex University site should be developed for a mix of uses, including new homes and community uses. The listed building at the heart of the site must be retained and enhanced through any redevelopment
- Any proposals for the former Middlesex University site should take a holistic approach to development, addressing the opportunities for improvements to the High Street and its facilities.
- As the Middlesex university site does not have a frontage to High Street, opportunities should be sought through land assembly to create a larger development site incorporating sites that face the main high street. Development should seek to create a more coherent active frontage onto Hertford Road, the High Street and Queensway that will overcome historic voids in the built form which detracts from the overall street scape of the Local Centre.
- New linkages from the heart of the university site to both Hertford Road and Queensway should be provided. New routes and connections will integrate this development opportunity with surrounding communities ensuring benefits are shared by all.

5.6 Ponders End Framework for Change

5.6.1 The Ponders End Framework for Change, developed with residents in 2009, sets out the overarching vision for Ponders End, connecting key community facilities and development sites through integrated public realm. The document also introduces the concept of three Planning Briefs for Ponders End Waterfront (southern Brimsdown and around); Ponders End South Street (Alma Estate and around); and Ponders End Central (High Street and former Middlesex University site).

5.7 Ponders End Central Planning Brief

5.7.1 The Ponders End Central Planning Brief was adopted in May 2011. This brings together all the ideas for Ponders End Central raised by many residents, community groups and businesses during consultation on the Framework for Change. The Brief also sets out guidance on development within the brief area and seeks:

- Residential led mixed use development of around 400-450 units on the University Campus site of predominantly family housing (3 bed plus) taking into account viability.

- Redevelopment of this section of High Street providing 90-110 new homes including those above new shops.
- 60% market and 40% affordable housing, and within that 40%, a 70% social rented and 30% intermediate housing split, subject to viability and wider place shaping aspirations.
- Public pedestrian, cycle and vehicular connections into the High Street, Queensway and Derby Road and towards Southbury Station.
- Sustainable design from the outset including an approach to integrated water management, quality materials, waste treatment, recycled materials, biodiversity and community growing space.
- Aim to achieve Sustainable Code Level 4 or BREEAM Excellent
- Predominantly dual aspect homes with generous internal spaces standards and 50% amenity space for houses and 50% amenity space for flats, with around 75% parking provision.
- 10% wheelchair accessible units, Lifetime Homes Standards and Secured by Design principles adhered to throughout.
- Employment uses (B1) to the north of the Queensway Campus site (near Queensway) and/or in the workshops located to the south of the listed building.
- Take-away uses to be resisted on the High Street.
- Listed building to be retained and enhanced and new buildings not to detract from primacy of listed building
- Accents of taller buildings across the north of the site and to aid legibility or denote civic function
- Accessible public amenity space and communal play space for all

5.8 Other relevant policy

London Plan Housing SPG, Interim Housing SPG
 Housing SPG (2012), draft Affordable Housing SPG
 London Housing Strategy, draft Revised Housing Strategy; draft Early Minor Alteration to the London Plan
 Enfield Market Housing Assessment
 Providing for Children and Young People's Play and Informal Recreation SPG and revised draft
 Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People; a good practice guide (ODPM)
 London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaption Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayors Water Strategy
 London Plan; the Mayor's Ambient Noise Strategy
 London Plan: the Mayor's Air Quality Strategy
 London Plan; the Mayor's Transport Strategy; Land for Transport Functions SPG
 London Plan; Mayoral Community Infrastructure Levy
 LBE S106 SPD
 LBE Draft Development Management Document
 PPS5 Planning for the Historic Environment Practice Guide
 Circ 06/05 Biodiversity and Geological Conservation- Statutory Obligations and Their Impact within the Planning System
 'The Broadbent building, Ponders End: Schedule of Repair'

6 Analysis

Principle

- 6.1 The Middlesex University site has stood vacant since 2008. There is no longer a need for the site to provide University accommodation and in reviewing its longer term future and redevelopment potential, through the various policy documents summarised above, the Council has identified the site should accommodate a residential-led mixed use development. The policy documents also identify the opportunity for a retail-led mixed use development to the High Street frontage. This application accords with these aspirations and the mix of uses proposed is acceptable in principle
- 6.2 The policy documents also encourage a comprehensive and holistic approach to the development of the High Street frontage and University site to create a new sequence of connected public streets and spaces and proper integration of the University Campus site with the High Street, to which access is presently confined to a narrow pedestrian link. This application promotes a comprehensive and holistic approach to the development of the University and High Street sites, providing for the necessary links to ensure that the new residential community to be created has safe and convenient access to the facilities along the High Street, public transport and the Park. This is particularly welcomed and meets a key aspiration for the regeneration of the area.
- 6.3 Concern has been expressed following public consultation that the application site does not extend far enough and should include the Mosque, property nos. 232-244 High Street, and in failing to extend to include additional site does not meet the strategic policy requirements for the area. This is not the case and the proposals do accord with the strategic aspirations for the area within the Upper Lee Valley OAPF, as confirmed by the GLA. Whilst the properties specifically referred to above are included within the boundary that defines the Ponders End Central Planning Brief area, unlike the sites included within the application site, they have not been identified as requiring redevelopment in order to achieve the regeneration aspirations set out in the brief. This is not to say that the sites should not be redeveloped and the development proposed does not prejudice their redevelopment at some point in the future. It is possible that additional sites beyond the application site will come forward for redevelopment as regeneration is kick started and the application under consideration does not prejudice this possibility.

Employment uses/social infrastructure

- 6.4 The application sites includes the site of No.230 High Street, Ponders End an existing light industrial unit with a floor area of approximately 950sq.m. This site does not fall within a strategic industrial location and lies outside the locally significant industrial land at Queensway Industrial Estate. Given this, and as the application makes provision for 2,708sq.m of new employment floor space within the scheme, the loss of this employment site does not raise a concern.
- 6.5 The Ponders End Central Planning brief encourages a mixed use development of the site and the provision of employment floor space. The brief does not quantify the amount of employment floor space to be provided.

Within the context of the scheme and the need to achieve a viable development, the level of space proposed is considered acceptable.

- 6.6 It is recognised that the Brief encourage the employment floor space to be located towards the Queensway frontage. This is on the basis that it was initially envisaged that the multi-storey car park would be demolished. The car park is to be retained as part of this application and therefore employment floor space has been accommodated elsewhere on the site, within the Listed Building, in the form of live/work units and new purpose built space towards the High Street frontage. The location of the units is acceptable and it is considered that the Listed Building could provide a unique form of workspace locally that could attract the creative industries that the Brief encourages.
- 6.7 The application site currently includes a library (481sq.m) and children's nursery (471sq.m), both of which would be displaced as a consequence of the development proposed. However, the application includes provision for a new library to the High Street frontage, a key aspiration of the Ponders End Central Planning Brief, incorporated within the No.198 High Street, the Tara Kindergarten building to be retained to the High Street frontage and within a new building adjacent. There would be no net loss of Library space. The application also makes provision for an additional 427sq.m of community space within the listed Gymnasium building, which could accommodate a nursery and 156 sq.m of new community space elsewhere on the site. There would therefore be no net loss of community space and indeed there would be a net increase.
- 6.8 It is noted that the GLA have advised that as the existing nursery has a floor area of 471 sq.m and the Gymnasium would only provide 427sq.m of space there would be a shortfall in nursery provision of 44sq.m and they have asked how this is to be addressed. Firstly, it is clear from the figures above that there is no net loss in social infrastructure as a consequence of the scheme. Moreover, whilst the existing Tara Kindergarten building extends to a total of 471sq.m, only 271sq.m of floor space is actually occupied by the nursery and therefore it is considered that a nursery use could be accommodated within the Gymnasium building and the building does benefit from external space that could provide outdoor play facilities.
- 6.9 A concern has been raised during public consultation that the proposals would result in the extinguishment of a number of viable and long standing businesses and therefore the application should make provision for their relocation. A planning application is but one part of the redevelopment process. If planning permission is granted then the applicant will need to secure all the interests in the land that constitutes the application site in order to enable implementation of the permission. This process of acquisition will require engagement with the local businesses and it is through this this process that the businesses needs for relocation and/or re-provision would be addressed.

Density

- 6.10 London Plan and Core Strategy policy seek to optimise the housing potential of sites whilst having regard to local context, good quality design and public transport accessibility. The site has a public transport accessibility level (PTAL) of 3 and for an area of sub-urban character, the London Plan density

matrix would suggest that a density range of 150-250 habitable rooms per hectare would be appropriate. However, it is recognised that the character of the area verges on urban having regard to the nature of surrounding development and the relationship of the site to the High Street with its mix of uses. Accordingly, some flexibility in the density range for the site is appropriate providing that the development provides high quality residential accommodation that is well designed and delivers an appropriate mix of units, sufficient play and amenity space and is well designed in its context.

- 6.11. The application proposes a maximum of 408 residential units and the applicants Planning Statement confirms this would equate to a density of 280 habitable rooms per hectare. Given the overall quality of the design, the mix of units proposed and the level of play provision and quality of amenity space, this density is considered acceptable.
- 6.12 The GLA have asked that density figures be provided on net residential area, or master plan plot area. The applicant has confirmed that based on net residential area, a residential density of 240 habitable rooms per hectare is achieved.

Mix of accommodation/ Affordable Housing

- 6.13 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing. Recent guidance is also set out in the Housing SPG (2012). Also relevant is Policy 1.1, part C, of the London Housing Strategy which sets a target for 42% of social rented homes to have three or more bedrooms, and Policy 2.1, part C, of the draft Housing Strategy (2011) which states that 36% of funded affordable rent homes will be family sized.
- 6.14 Core Strategy Policy 5 also seeks to ensure new developments offer a range of housing sizes to meet housing need and in this respect the following Borough-wide mix is sought

<i>Market Housing</i>	<i>Social rented housing</i>
20% 1 & 2 bed flats	20% 1 & 2bed 3 person flats
15% 2 bed houses	20% 2 bed 4 person flats
45% 3 bed houses	30% 3 bed units
20% 4bed + houses	30% 4 bed + units

- 6.15 London Plan policy 3.12 seeks to secure the maximum reasonable amount of affordable housing on site. Core Strategy Policy 3 states that the Council will seek to achieve a borough-wide target of 40% affordable housing units in new developments. Both policies recognise the importance of viability assessments in determining the precise level of affordable housing to be delivered on any one site.
- 6.16 This application anticipates the following general mix of accommodation

66 x 1 bed	(17%)
100 x 2 bed	(26%)
144 x 3 bed	(37%)
81 x 4 bed	(21%)

6.17 The evidence base on which the Core Strategy Policy was based was undertaken in 2010, based on demographic data based on the 2001 Census and housing market data from 2009. The applicant in preparing to submit this application recognised that this data needed updating, particularly as the 2011 Census was available, which has informed a revision of household and associated housing projections. A bespoke assessment focussing specifically on Ponders End was therefore commissioned and this has been submitted as part of the documentation supporting this planning application. This advances a number of specific conclusions and recommendations in terms of an optimum housing mix:

“Mix by Tenure: Ponders End has a large stock of affordable housing and therefore, provision needs to have a more specific role, for example, to meet the requirements of families and to encourage older people to downsize. There is no evidence to suggest any necessary deviation from the Council’s Affordable Housing ‘Core Policy’ of requiring 40% affordable housing (70/30 social rented/intermediate):

“Mix by property type: The imperative at the Queensway Campus site is to improve the supply of family housing for which there is clear evidence of both need for affordable housing and demand for market housing. It is recommended that the development should ‘buck the trend’ and provide a high proportion of family housing and of houses of 2 beds or larger. The more detailed recommended mix by property type and bedsize is as follows:

- Four bed houses are larger: there is only limited evidence of a requirement for 4 bed or larger homes in the market sector locally, and these are likely to be less viable in such a low value location especially in initial phases. Need and demand are strong in the affordable sector but a more effective strategy to increase supply might be to provide aspirational options encouraging older people to downsize from larger social rented homes to 1 or 2 bed properties.
- 3 bed flats and houses: such housing meets the imperative to provide family housing though houses may have to be of high density to achieve the external space preferred.
- 2 bed flats and houses: housing of this size has a major contribution to make to meeting a range of priorities and requirements, including designated or extra care housing; encouraging older people to downsize and providing more financially accessible options in the market sector.
- 1 bed flats: whilst these still have a limited role, they will generate significant investor interest and, as a result, may be better suited to intermediate housing. One bed units would also be appropriate for designated or extra care housing

“Based on the research the HMA advances an optimum housing mix for the Queensway campus site of

Bedsizes	Proportion	Type	Proportion of total
1	10%	Apartments	10%
		Houses	0%
2	40%	Apartments	20%
		Houses	20%
3	40%	Apartments	10%
		Houses	30%
4	10%	Apartments	0%
		Houses	10%
Totals	100%		100%

- 6.18 Based on the above, the HMA concludes that a completely policy compliant mix may result in too great a supply of 4 bed units and too few 2 bed units. The applicant recognises that the HMA represents a moment in time and that demand for particular unit sizes may change over the life of the project. However, as this is an outline application and in order to retain some flexibility to vary the mix over time, the applicant is applying for a maximum of 408 units, to enable the conversion of some of the 4 bed units into 2 bed units should demand dictate. This would have the effect of reducing the total number of 4 bed units to 68, the 3 bed units to 128 and increasing the number of 1 bed units to 67 and 2 bed units to 145.
- 6.19 Whilst the mix of development outlined above in either the first or second scenario is still indicative and the final mix may differ as the scheme is progressed to detailed stage, the applicant has committed to the provision of a minimum of 50% of family units (3 bed +) . It is also recommended that conditions be attached to any permission requiring the remaining number of units to be mixed in terms of size. Overall and subject to conditions, the mix is considered acceptable and compatible with the Council’s aspirations to deliver a balanced and sustainable community.
- 6.20 Turning to the level of affordable housing to be provided, this needs to be assessed in the context of scheme viability. Financial viability evidence has been submitted by the applicant and this has been reviewed by an independent expert who has worked on a number of schemes in Enfield and specifically in Ponders End over the past 2 years. The key output is that the proposed scheme delivers a reasonable profit, whilst providing the following planning contributions:
- 30% affordable housing, with a tenure split of 58% affordable/social rented and 42% shared ownership housing.
 - 50% of the affordable/social rented units are family sized 3 and 4 bed homes, whilst 37% of the affordable housing content overall is family housing.

- The scheme would also deliver a 491 sqm GIA library to be completed to fit-out stage, with a total build cost of c.£1.5m.
- A further 583 sqm of community (D1) space, including the potential for a nursery, with a total build cost of c.£1.0m.
- Section 106 costs of £125,000. These are lower than otherwise would have been required by the Council due to the inclusion of the library and other community spaces.
- Mayoral CIL cost of £890,000.

6.21 He has confirmed that the the planning contributions offered represent the optimal mix and level of affordable housing that the scheme can viably support at the present time, whilst contributing to the regeneration of Ponders End.

6.22 As the level of provision of affordable housing is below the Policy aspiration of 40% provision and in line with the comments received from the GLA, an appropriate clawback mechanism will need to be put in place for additional on-site affordable housing and/or in-lieu payments to be introduced over time, subject to an improvement in the viability of the scheme during the course of the development. This will need to be addressed by way of condition.

Residential standards

6.23 Policy 3.5 of the London Plan seeks to ensure that housing developments are of the highest quality internally, externally and in relation to their context and to the wider environment. Table 3.3, which supports this policy, sets out minimum space standards for dwellings. The draft Housing SPG and London Housing Design Guide build on this approach and provide further detailed guidance on key residential design standards, including the need for developments to avoid single aspect dwellings that are north facing, where exposed to noise exposure categories C or D, or contain 3 or more bedrooms. Core Policy 4 reiterates the need for high quality design in all new homes, referencing back to the space standards and the above Design Guide.

6.24 Whilst this is an outline planning application, the application is supported by a series of documents, including a Design and Access Statement (SD4), Development Specification and Design Principles (SD1) and Parameters Plan (SD1) that confirm:

- All residential units, will be designed to meet the space standards set out in Table 3.3 of the London Plan;
- The majority of units will be dual aspect and there will be no single aspect, north facing units;
- All residential accommodation will be provided with private amenity space in accordance with the Mayor's Housing SPG;
- 10% of units will be capable of being adapted to wheelchair standards; and
- All units will be Lifetime Homes compliant.

6.25 Conditions are recommended to secure the above design standards are met.

Children's play space/Amenity space

- 6.26 London Plan policy 3.6 requires that development proposals that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Based on the illustrative residential mix presented and the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), the GLA has calculated an expected child population of 294 for the development. Based on this, the SPG indicates that the development would need to make provision for 2,943sq.m of children's play and informal recreation space. The Parameters Plan submitted as part of this outline application allows for the delivery of 3000 sq.m of children's play and informal recreation space on site. The proposed provision of soft landscaped communal play areas, semi-private amenity spaces (for flats) and private gardens (for houses) will ensure opportunities for doorstep play, whilst the nearby open space at Ponders End Park will provide informal recreation opportunities for older children. It is also noted that the proposals make provision for new and enhanced pedestrian links to the Park to facilitate safe and convenient access to the Park.
- 6.27 UDP policy (II)H9 seeks to ensure that amenity space is provided within the curtilage of all residential development, normally in accordance with the standards set out in Appendix A1.7. These standards seek to ensure that amenity space for individual houses equates in terms of area to 100% of the gross internal area of the dwelling, and in respect of flats, 75% of the gross internal area of the block. In the case of small flats in low cost schemes the provision of amenity space may be reduced to 50% of the Gross Internal Area. However, the Ponders End Central Planning Brief confirms that amenity space provision for new developments within the brief area should equal 50% of the gross internal area of either buildings or houses.
- 6.28 In addition to these standards, the London Housing Design Guide advises that a minimum of 5sq.m of private outdoor space should be provided for 1-2 person units and an extra 1sq.m for each additional occupant thereafter.
- 6.29 Amenity space provision across the site is provided in the form of courtyards, balconies and roof gardens for flats and private gardens for the houses. As this is an outline planning application the precise level of amenity space for each block/dwelling cannot be calculated. However, the Development Specification (Part 1 and Design Principles (Part 1) (SD1) document submitted with the planning application confirms that the residential accommodation will be provided with private amenity space in accordance with the London Design Guide. This level of provision would be below the present UDP standard and below the level of amenity space provision anticipated through the Ponders End Central Planning Brief. Nevertheless, the level of amenity space needs to be considered in the context of the quality of the scheme overall. The application confirms the provision of secure private courtyards for the flats blocks, private balconies/terraces for all units and private gardens for the houses to the southern boundary. The application also makes provision for children's play space and areas of public realm in addition to the private amenity space available to residential occupiers. Moreover, the application makes provision for enhanced and convenient pedestrian/cycle links to Ponders End Park. Taken together, it is considered that the benefits to be delivered by the scheme overall and the quality of the

overall design approach proposed are sufficient to justify a relaxation in the level of amenity space provision.

Design

Access, Egress and Movement:

- 6.31 The scheme has four access points. The primary vehicular access and egress points are in the northwest and southeast of the site. The primary route through the site is clearly indicated through a street hierarchy diagram, and the relative importance of routes is reinforced through their cross-section, the building heights either side, and the treatment of the public realm.
- 6.32 A clearer desire line through the site from the park/high street to the NW entrance and on to Southbury Rail station would have been supported. However, the applicant has explained that creating a more direct route would create blocks with difficult development shapes, reducing the total development floorspace. On such an economically marginal scheme, this would be likely to create viability problems. This argument is accepted, and it is noted that the layout and public realm treatment still provides a clear route through the site, with only a small increase in travel time for pedestrians.
- 6.33 There is good separation of the public and private realm and streets/routes are well-defined through the use of perimeter blocks, terraces and a gated mews. The latter of which is a typology typical of many London high streets and while the detailed design will need to be examined closely (to ensure security is maintained and that a successful relationship between building fronts and backs and the commercial properties of the high street is achieved), it is refreshing to see a scheme which proposes a mix of development forms which respond appropriately to their context and will help make the place memorable.
- 6.34 In a similar vein, while the pedestrian access adjacent to the mosque is fairly tight (8m at its narrowest) this is also typical of side streets in London. The route quickly widens to 12m, which will add interest to the route and provide a comfortable separation between buildings. In addition, the absence of vehicular movements means that 8m at the pinch-point will be adequate to achieve a high quality public realm, comfortable for a shared cycle and pedestrian route.
- 6.35 The 4th access point is via the retained multi-storey car park. The car park is accessed either from the interior of the site, or from Queensway, but the only egress is onto Queensway. Generally the use of multi-storey car parks is not supported because they are not convenient for residents, and can be unsafe and/or increase fear of crime. It is also unlikely that pedestrians will choose to use the car park as a means of access. Preferably, the car park would be removed, and a street introduced. However, the applicant has explained that reuse of the car park is key to the re-provision of parking for the adjacent industrial uses, and that demolition would not only be prohibitively expensive, but would mean that the public realm in the remainder of the site would become dominated by cars. A visual representation of this would have been helpful. On balance, and with appropriate management, facade treatment/wrapping, lighting and security/access control, the retention of the car park is considered acceptable.

- 6.36 Many of the streets in the illustrative plans are shown to include long, straight sections. This could encourage rat-running through the site and unacceptable speeds. However, the design principles clearly state that traffic speeds will be controlled through the positioning of trees and the narrowing of the carriageway. While supported, the implementation of this strategy will need close scrutiny as details are submitted.
- 6.37 The use of 1-way home zones in the tertiary streets is supported to allow more room for informal play and landscaping and to discourage through-traffic. The success of this is demonstrated in illustrative sketches.
- 6.38 The scheme identifies two additional pedestrian/cycle access points: one towards the south (towards Derby Road), and one in the north of the site (to the west of the multi-storey car park). Both would be of benefit to the scheme and to permeability in the wider area. The applicant is encouraged to progress these links but the scheme is not dependent on them. Separate planning applications would be required should discussions with relevant landowners/occupiers prove successful.
- 6.39 The layout is sympathetic of existing development and does not prejudice the delivery of adjoining sites in the future.

The Relationship of Buildings to the Street and Each Other:

- 6.40 Generally these relationships are good, with strong building lines and surveillance of the street and sufficient separation between buildings. There are a number of pinch points, for example to the northern end of plot B1. The design principles state that this will be dealt with using frosted glazing and oriel windows. It is accepted that limited use of this technique could be successful. Angled windows and facade projections could also be used to achieve required privacy and overlooking.
- 6.41 In addition, the listed gym (B5) is situated in close proximity to block B3. Perspective sketches demonstrate that this proximity can still allow for an acceptable setting for the listed building. However, the detail of the treatment of the public realm and the positioning of fenestration and parking etc will need close scrutiny in the assessment of reserved matters.
- 6.42 More could have been made to views to the listed building on the approach from the east/high street, in particular increasing views of the tower and the attractive eastern flank through staggered building lines. This was discussed with the applicant, who explained that the northern route was positioned to encourage the integration of the scheme with the development along Queensway, providing the opportunity for a future development frontage, or for the existing employment buildings to front onto the street in the near future. This is a valid argument, and therefore no objection is raised.
- 6.43 The retention of the caretaker's cottage is supported, creating a natural arrival space at the NW entrance and maintaining the historic relationship of the buildings.

Quality of Accommodation:

- 6.44 The proposals for conversion of the listed building represent a marked improvement on all previous proposals that have been assessed. The introduction of light-touch B1 and live/work units is strongly supported. A large proportion of the original layout is retained, and the arrangement of units/uses appears to largely address any overlooking issues, despite the close proximity of the new built element to the south.
- 6.45 Access to new residential blocks positively addresses the street and small cores avoid excessive numbers of units per core as well as completely avoiding north-facing single aspect units (in the new build), and maximising dual aspect accommodation. The interior layout of some units will need scrutiny when detailed plans are submitted to ensure acceptable light and outlook is achieved (e.g. at the corners of the courtyard blocks).
- 6.46 Location of bin and cycle stores seems sensible for the new build elements. However, there is a concern at the distance between some residential units and the bin stores within the converted listed building and this will need to be revisited when reserved matters and details are submitted.

Scale: Height and Massing:

- 6.47 The surrounding area has a mixed character, with a finer-grain in the Victorian terraces contrasting with the industrial buildings along Queensway and the Broadbent building. The scale of the proposed development responds well to its context, and is varied successfully to indicate the hierarchy of routes through the site. The development along the high street in particular is broken into distinct sections (also retaining the Tara Kindergarten building, which has architectural merit) reflective of the grain of the existing high street.
- 6.48 However, the five-storey limit to the library building may be unduly restrictive given its location opposite the park and the large adjacent open space to the south. Flexibility could also be given to introduce a slight projection to the south. Neither of these issues cause significant objection, but it is a shame that this flexibility has not been provided in the outline application.
- 6.49 The detailed design of buildings will need to reinforce the residential nature of the development through the final proposed massing, fenestration and architectural detailing.
- 6.50 The relationship between the retained Tara Kindergarten building and the new library building may need additional attention as details are submitted, both in terms of its massing and the roof profile.
- 6.51 The parameter plans indicate a potential height of five storeys adjacent to the listed building. The height immediately adjacent to the building (not necessarily across the entire block) should respect the roof line of the existing building, for example, by setting back the fifth storey in a similar manner to that shown in the illustrative sketches.

Landscape:

- 6.52 This is an outline application, and therefore the details of the landscaping elements are reserved. However, the number, size and location of open spaces seem appropriate for the proposed development. The illustrative

scheme includes a variety of open space types, which add variety and choice to residents.

- 6.53 The inclusion of landscaped home zones with shared surfaces offer additional opportunities for informal play, as well as an enhanced setting for residential units, and are therefore supported.
- 6.54 The detailed submission will need to pay particular attention to the landscaping treatment around the listed building (including external bin stores), gateways and also to landscaping/means of enclosure adjacent to exposed back gardens/service yards of surrounding development. In the case of the latter, the suggestion of green walls discussed in the Design and Access Statement is supported.
- 6.55 Regarding the illustrative scheme, the landscaping at gateways seems generally appropriate. The area to the southeast of the site (College Court) is particularly challenging, having to accommodate existing parking and development. The proposed arrangement is a vast improvement on the existing car park, access and landscaping arrangements.
- 6.56 There is some disagreement in the drawings over the treatment of the northwestern gateway due to ongoing discussions between the applicant and the Council. A revised sketch showing a space in front of the caretaker's cottage has been provided and is the preference. Bin stores etc in this area would be likely to significantly detract from the quality of the environment at this arrival point.
- 6.57 The proposal uses a perimeter block courtyard typology to provide a mixture of private amenity space at ground floor (immediately adjacent to residential units) surrounding a secure communal space. This is unusual for this area of the borough, but not elsewhere. It is also an efficient form of amenity provision, and provided that the private elements are large enough for outside seating, bbqs and entertaining guests etc, this should be acceptable. The transition between private and communal areas will need to be examined when details are submitted.

Density and Mix:

- 6.58 The mix and distribution of uses is appropriate.
- 6.59 The retail element will help to stitch the currently fragmented high street together and help the centre function as a focus of activity. The relocation of the library to this frontage, in the prominent position opposite the park will further help to reinvigorate this area, as well as improving prominence and psychological accessibility of this community resource. The detailed application should look to include some co-located facilities within the library, such as meeting rooms, based on any identified need within the area.
- 6.60 The retention of the multi-storey car park remains a concern, in terms of both security and convenience. However, as set out above, the arguments for retention are convincing and on balance, no principle objection is raised.
- 6.61 The inclusion of B1 and live/work units within the Broadbent building will not only add to the richness of the area and complement industrial uses along

Queensway, but is a sympathetic use of the listed building, appropriate to its historic function as a technical college.

- 6.62 The inclusion of a nursery occupying part of the listed gymnasium is a good use of this pavilion building, and of the adjacent open space.
- 6.63 The proportion of family units is high, and while falling slightly short of the Core Strategy requirement is considered appropriate taking into account the high street location and the conversion of a listed building.
- 6.64 The distribution of tenure across the site is good, with all streets containing a mix of tenure types. However, most courtyards contain a mix of tenures in the surrounding residences, which while a positive move for integration, may cause issues with the quality of landscaping that can be afforded and/or management.
- 6.65 The proposed density is relatively high. However, despite the GLA's assessment of the site as suburban, I would argue that the site and the immediate context could be judged as urban. In addition, the design, layout and typologies used sit comfortably within the site and do not appear to be over-development.

Appearance: Details and Materials:

- 6.66 Special attention will need to be paid to the treatment of corner and gateway buildings, especially where these are highly visible or where the architecture needs to help indicate the route hierarchy through the site.
- 6.67 Likewise, the close proximity of development to the listed building, and in particular the gym building, requires that close attention is paid to the materials and detailing of these elements to ensure they do not detract from the listed building.
- 6.68 In general, the proposal should reference, but not copy the materials and architecture of the listed Broadbent building and surrounding development.
- 6.69 The materials and detailing within the home zones will also need close attention to ensure that engineering, aesthetic and play functions are all successfully accommodated.
- 6.70 As this is an outline proposal, it is not appropriate to comment further on materials and detailing at this stage.

Conclusion:

- 6.71 The proposal represents a good use of the site, both in terms of densities, layout, quality of accommodation, and the response to the listed building. The inclusion of land adjoining the high street allows a comprehensive approach to the regeneration of the wider area to be adopted, with significant success.
- 6.72 The illustrative scheme successfully demonstrates that the principles and development parameters set out in this outline application can be implemented in detail to produce an attractive and functional development.

- 6.73 The variety in street types, open spaces and built form, and the detailed ideas for landscaping and architectural detailing, promise to produce a rich, functional, attractive and highly legible environment.

Impact on Heritage Asset

Significance

- 6.74 The Broadbent building is Grade II-listed in recognition of its special architectural and historic importance. Designed by Curtis and Burchett of the Middlesex County Architects Department as a technical college it had, until it became redundant a few years ago, been in educational use since its construction. Since there has been no real need for extensive alteration, large portions of the building survive extensively intact.
- 6.75 Until the 1930s educational institutions built by local authorities followed in the architectural tradition established in the 1870s by the School Boards. They were of traditional construction and were generally brick-built with Queen Anne-style timber windows. The need for a cheaper means of building led Curtis and Burchett to look to the continent for a radically different style and way of building. Willem Dudok, the City Architect of Hilversum in the Netherlands provided the inspiration for their new, modernist style. Characterised by concrete and steel construction, dramatic, large, linear blocks with seemingly vast expanses of metal windows, brick cladding and decorative tiles. Curtis and Burchett adopted and modified Scandinavian Modernism for their own range of institutional buildings. Despite the stylistic departure the Broadbent building continues many of the traditional principles of educational buildings in this country with large, flexible internal spaces, large windows and ventilation across corridor-plan blocks.
- 6.76 Included in the listing as curtilage structures are the Caretaker's Cottage and the gymnasium, both designed using the same construction principles and materials. The gym is more Modernist in style, where the house is more conventional in form with its hipped, pan-tiled roof.
- 6.77 The Broadbent building was designed on a symmetrical plan with a principal elevation that centres on an entrance tower with two wings on either side, these return to enclose two courtyards, with a lower two-storey wing dividing them that accommodated an auditorium. The simplicity of the design in both plan form and in the hard-wearing quality of the materials adds the architectural success of the Broadbent, making it not only functional and easily navigable but an aesthetic achievement too.

Previous Harm

- 6.78 There are a number of later additions to the Broadbent building, the southern courtyard has been largely filled in by extensions. The space between the Broadbent and the gym also has numerous accretions that are of minimal value. Internally, a couple of the original corridor walls have been removed and either a central corridor inserted or the wing has been left open-plan. The auditorium has a later mezzanine and lift shaft which date from its use as a library. These compromise the appreciation of the double-height space, though the coved ceiling, stage and proscenium arch appear all intact. The setting has also been compromised, partly by numerous new buildings and

the hard standing which surrounds them, but also from a recent lack of maintenance of the site.

English Heritage's Advice

- 6.79 English Heritage did not provide comments to this application. Their views on the significance of the building were explained in comments they provided as part of a pre-application consultation to a previous listed building consent application affecting the Broadbent building and its surrounding site. The previous application was also for its residential conversion and English Heritage expressed concern that the significance would be harmed by the proposals.
- 6.80 The significance of the Broadbent building was identified by English Heritage as relating primarily to the Scandinavian Modernist aesthetic employed for the buildings and additionally to the historic and communal values associated with its initial use as a technical college. The interiors, other than more important spaces like the entrance hall and auditorium were assessed as being of moderate aesthetic value. English Heritage concluded that harm would be caused by the proposals but this would be less than substantial harm and that the Council should assess the proposals with reference to the relevant policies (at the time this was PPS5).
- 6.81 English Heritage have sent a further letter in response to these planning and listed building consent applications stating that the decision should be taken by the authority but without any further advice from them

Principle of Conversion

- 6.82 Since there is no foreseeable chance of educational use returning to the site, conversion is necessary for the building to have a viable future. The impact of residential conversion obviously can vary hugely depending on the number of units and the level of change proposed to the fabric of the building. However the corridor layout of much of the Broadbent building, the flexible nature of the spaces and the scale of it make subdivision into residential units a potentially appropriate one.
- 6.83 The subdivision into units will inevitably mean the loss of some of the internal character. The current character of the interior of the building is of a mixture of classroom sizes, the spaces are generally airy and the large expanses of window increase this impression of generous spaces. The scheme proposes fairly intensive subdivision on the first floor in order to accommodate bedrooms and bathrooms but much larger, flexible spaces are provided on the ground floor. The second floor, although divided into units is not so intensively subdivided since these are living areas for the 2-floor units. The scheme has responded to the constraints of the building rather than imposing a scheme that is at odds with its character. The larger spaces on the ground floor, the office use for the auditorium and the winter gardens on the first floors are all good examples of this.

Generally

- 6.84 The proposals will restore the general form and footprint of the listed structures. The major changes proposed to the plan are the demolition of the workshops and the former kitchen. Both these spaces do not hold much

interest architecturally. The loss of the kitchen will allow the north courtyard to be opened up as a useful communal area.

- 6.85 The internal finishes are proposed, wherever possible, to be repaired and restored and the windows on the north elevation will be repaired. Much of the rest of the glazing will be replaced with double-glazed W20 steel windows which provide a close match to the originals but provide better thermal insulation. The repair and replacement of the windows is informed by a technical report that assessed what could feasibly be conserved and provides justification for the loss of original fabric.
- 6.86 The grouping of the gymnasium, Caretaker's Cottage and Broadbent building are retained.
- 6.87 On balance the scheme represents a viable future for the listed buildings. Some loss of fabric and institutional character will be sustained but also the repair of the fabric and much of the floor plan and finishes will be ensured making the application on balance beneficial.

Internal Finishes

- 6.88 The internal finishes are simple but in evidence throughout much of the building and are in variable condition. The corridors and classrooms have parquet floors and the stairways terrazzo. The original radiators are still in evidence throughout too. These are high quality materials and in keeping with the aesthetic of simple, functional elegance which is an important characteristic of the building.
- 6.89 The heritage report explains that the internal finishes will be repaired where needed and restored where lost. In principle this is welcomed but the method of repair and replacement materials used will have to be dealt with by condition.

The Caretaker's Cottage

- 6.90 The Caretaker's Cottage is being retained and re-used though little further detail is given. The proposals suggest that it is used either as a new facility for business or community use. The proposals effectively show that the internal partitions will be removed though this is not discussed in the heritage report. The significance of the cottage is essentially as part of this contemporary grouping as a relatively intact example of well-designed educational buildings of the period. In this sense the loss of internal walls is not particularly damaging to the listed group. The repair of the windows and external fabric will have to be dealt with by condition.

Plan Form

- 6.91 The plans indicate that many of the internal corridors will be removed, even where the proposal intends to retain the original corridor position. The east corridor of the ground floor in the north block is the only area shown that will retain the original corridor walls. The original walls have clerestory windows which allows light and air movement across the wings and is a traditional characteristic of historic institutional building. They also make for a more pleasant internal environment. The removal of these walls therefore will cause

some harm even though they are generally being replaced by walls in the same position. It is not clear whether the clerestory windows would be replicated in the new walls but these may well be unfeasible where the corridors are communal. There may well be good justification for the removal but this is not put forward in the application. If the reason for removal of the walls was the clerestory windows and the problems of sound travelling and thermal insulation, there is no apparent reason why they could not be retained on the second floor where the corridor areas are proposed to be winter gardens with the flats and are therefore integral to the units.

- 6.92 Having said that, a number of the corridors through the building have been removed previously and will be reinstated, in their original positions throughout the building. This represents a considerable improvement to the significance of the plan form, restoring an important aspect of its internal arrangement. The partitions of the units on the ground floor take their lead from the original plans which show many spaces that constitute three of the windows bays. This allows the qualities of the original spaces to remain in evidence on the whole of the ground floor, maintaining and restoring another important characteristic of the interior that has been eroded.
- 6.93 Larger live-work units are proposed for the north block which means a range of spaces of different sizes will be created. This reflects the original plan and intention for flexibility that included larger, classroom spaces.
- 6.94 The inclusion of the second floor corridors as winter gardens is an imaginative use of the reinstated plan form.
- 6.95 The variation in the size of internal spaces proposed and the restoration of the position of the corridors makes the overall impact on the floor plan not harmful to the significance of the building. Some harm will be caused from the removal of walls and the subdivision of the spaces on the upper floors but the amount of restoration proposed will go a considerable way to negate this.

Windows

- 6.96 As summarised in the 'Significance' section the windows are integral to the character of the building. The emphasis of this unadorned style of architecture comes from the expanses of solid wall and glass. The pattern of fenestration and the slim profiles of the glazing are part of the rhythm of the elevations and even a slight change in detail would result in a different appearance.
- 6.97 The building has been empty for a number of years and the windows have therefore not been maintained and many are in poor condition. As part of a recent application for the building a firm called West Leigh who specialise in steel windows was commissioned to carry out a report on their condition and the most sensitive and practical options for repair and/or reinstatement. The report concluded that the deterioration of the windows had occurred very much on an elevation by elevation basis rather than window by window. Replacing windows on a more ad hoc basis would also result in a discordant appearance since there would be very subtle differences in the glazing. The north elevation was in the best condition and was the best candidate for repair. The report explains the need for enough steel to be salvaged from other windows for the repair and the insufficient amount of steel in good condition remaining on the windows of the east, west and south elevations for

them to be repaired. The report is clear about which windows could feasibly be repaired and which are important to retain for aesthetic reasons (e.g. The staircase windows). The report is based on the physical evidence of the building's condition and offers a practical solution that takes into account the visual importance of the windows to its significance. The option proposed allows the retention of the windows of the north elevation which is arguably the most important as well as those for the staircases. This allows the main elevation to survive intact and the rest to be replaced with the closest visual product on the market.

- 6.98 The application proposes to follow the recommendations of the report which is an acceptable and justified approach.

Auditorium

- 6.99 The auditorium space is significant for its role in the Broadbent's history as a communal focus for the college. Various insensitive alterations have taken place including the insertion of a first floor and lift shaft in the centre of the space.
- 6.100 The proposals include the replacement of the first floor with a free-standing mezzanine that does not touch the walls or windows of the space. This will go some way to restoring the auditorium as a single, double-height space. The room is large and realistically has to be put to some profitable use and office use allows the space to remain open. Although the complete restoration of the space would be the ideal solution, some compromise in order to allow the scheme to be economically viable has to be made. The removal of the lift is also proposed which is welcomed.

Loss of the Workshops

- 6.101 The workshops do not display the same innovative characteristics as the other listed buildings. They are a fairly regular and traditional form of building that do not have the same aesthetic quality of design externally. They have also been altered in the 1990s. The listing states that they are not of integral significance to the site. Their height limits the number of units that can be inserted and in order for the scheme to be viable their loss has been accepted.

The New Residential Block

- 6.102 The new residential block replaces the workshops. The design will be contemporary but will respond to the Broadbent building elevations. It will restore the internal southern elevation of the south courtyard and be the same height as the existing east and west wings of the Broadbent building.
- 6.103 This aspect of the development is also required to make the restoration of the listed buildings viable. It is restricted to the least innovative and significant elements of the listed structures and will restore the form and footprint of the courtyard.

Conclusion

- 6.104 The scheme responds to the significance of the building and works with its fabric and character. Some harm will occur but this is justified in interests of finding a viable new use to ensure the building's future.
- 6.105 An associated Listed Building Consent application has been submitted in conjunction with this application dealing specifically with the works to the Listed Building. As outlined above, the works proposed to the Listed Building are overall considered acceptable. Sufficient information has been submitted with this application to enable the conclusion to be reached that the proposed extension to the Listed Building is acceptable in terms of its size, siting, scale and general pattern of fenestration and that subject to conditions, planning permission could be granted. However, a Listed Building Consent application requires a much greater level of detail. This information has been requested but is not yet available and therefore the Listed Building Consent application has not been included on this agenda. Notwithstanding, as the Council is the applicant for this Listed Building Consent application, the legislation presently requires that the application be determined by the Secretary of State, through the Department for Communities and Local Government. Accordingly, Members should note that the Listed Building Consent application will not be coming before them for consideration and will be referred to the Department once additional information has been submitted.

Inclusive access

- 6.106 The application confirms that all proposed dwellings would meet the Lifetimes Homes standard and 10% of dwellings would be accessible/adaptable for wheelchair use in line with both London Plan and Core Strategy policy
- 6.107 The applicant has confirmed that one dedicated parking bay would be provided per wheelchair accessible/adaptable dwelling.

Sustainable Development

- 6.108 In line with London Plan Policy 5.2, the application includes an energy strategy for the development setting out how carbon dioxide emissions will be reduced in accordance with the London Plan energy hierarchy. The components of the energy strategy are set out below:

Energy Efficiency

- 6.109 A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by Building Regulations. Other features include mechanical ventilation with heat recovery and high efficiency lighting. The demand for cooling will be minimised through passive shading. These measures are supported in accordance with London Plan Policy 5.3
- 6.110 Through the first stage of the London Plan energy hierarchy the development is estimated to achieve a reduction of 200 tonnes per annum (12%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development. Whilst the level of estimated savings is supported, the results of the energy modelling to verify these projected carbon dioxide reductions will be required and this will be addressed by condition.

District Heating

- 6.111 The applicant has provided a commitment to ensure that the development is designed to allow for future connection to a district heating network, should one become available.
- 6.112 The proposal to install a site heat network is supported. The GLA requested that the applicant confirm that all apartments and non-domestic uses will be connected to the network and provide a drawing showing the route of the heat network linking all buildings on the site. This has now been provided and a condition is recommended to secure compliance.
- 6.113 The site heat network will be supplied from a single energy centre of 180sq.m, located within the multi-storey car park.

Combined Heat and Power

- 6.114 The application make provision to install a gas fired combined heat and power system (CHP) as the lead source for the site heat network. The CHP is intended to be sized so as to provide the domestic hot water load, as well as a proportion of the space heating. This is supported and a reduction in regulated carbon dioxide emissions of 120 tonnes per annum (13%) is expected to be achieved through this second stage of the London Plan energy hierarchy. The GLA have asked that the applicant provide details of CHP sizing and heat load profiles so that the calculation of savings in regulated carbon dioxide emissions may be verified. As this is an outline application the energy profiling would be limited in accuracy. Accordingly, a condition is recommended requiring the submission of an energy assessment report containing detailed specifications relating to CHP sizing and heat load profiles.
- 6.115 The submitted energy strategy states that an interim heat supply will be provided (using gas-fired boilers) until the phased development is sufficiently built out so as to provide a base heat load for the CHP. Once this point has been reached the CHP will be installed as the lead heat source, and the gas boilers will be utilised for peak loads only. This approach is supported as a pragmatic response to delivering carbon dioxide savings over the phasing of the development. The GLA have advised that the threshold for the provision of CHP should be 60% with respect to the build out of residential units. This is to be addressed through a condition.

Renewable energy technologies

- 6.116 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 1,050sq.m of solar photovoltaic panels (PV). The GLA have asked that the location of these should be identified in the outline scheme. This is shown within the Design and Access Statement. However, as the siting and design of buildings is not for determination under this application this may vary as further details come forward that therefore it is considered appropriate to impose a condition requiring the submission of details of the strategy for the provision and phasing of the PV Panels across the development.

- 6.117 A reduction in regulated carbon dioxide emissions of 61 tonnes per annum (4%) will be achieved through this third stage of the energy hierarchy.

Overall carbon dioxide savings

- 6.118 As requested by the GLA, the applicant has confirmed that all carbon dioxide emissions quoted (including the baseline) are regulated figures only. The applicant has advised that the Energy Strategy report submitted with the application uses whole energy figures. These are used in order to quote percentage reductions for CHP and PV against these whole energy figures. With respect to London Plan Policy 5.2 requirements for emissions reductions, they acknowledge that this needs to be reported against regulated figures. However, they re-affirm that a minimum 25% saving will be achieved against regulated energy demands for the development. They also highlight that a code level 4 standard is to be applied to 76% of the development area, as referred to in the sustainability statement and energy reports and that this reinforces the submission commitment to meet the requirements of London Plan policy 5.2. Conditions are recommended to require compliance with Code level 4 and BREEAM 'Very Good'.

- 6.119 Based on the information provided, a reduction of 451 tonnes of carbon dioxide per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected. This is equivalent to an overall saving of 27%, which would exceed the current (2010-2013) target within London Plan Policy 5.2, and is supported.

Climate change adaptation

- 6.120 The application confirms that approximately 50% of the roof area of the development would include a green or brown roof, and that this, coupled with the proposed soft landscaping areas and permeable surface treatments will promote the use of sustainable urban drainage systems at the site. The applicant is also exploring the opportunity to incorporate a living wall as part of the refurbishment of the multi-storey car park. These measures are strongly supported in accordance with London Plan policies 5.10, 5.11 and 5.13.
- 6.121 The application indicates that it will be necessary to remove and replace a number of trees at the site to facilitate the redevelopment. The recommendation within the application is that all the trees removed as part of the development are replaced with semi-mature native specimens where possible and this is supported in principle. The GLA have advised that it not clear from the documents submitted what the expected numbers of trees to be retained, lost and replaced would be. This information is in fact contained within the Ecological and Arboricultural Assessment submitted as part of the application. This confirms that whilst the scheme does require the removal of a number of trees, these are primarily poor quality specimens and of limited amenity value, although it is acknowledged and as set out below in the 'Trees' section that a number of Category A tree would also need to be removed. Notwithstanding, the scheme overall will allow for a net increase in trees across the site and this is supported. Conditions are recommended requiring the submission of a comprehensive landscaping strategy for the site to ensure that there is no net loss of trees across the site.

Transport

- 6.122 It is recognised that the development will have an impact on the local highway network in terms of traffic generation. As set out in the Traffic and Transportation observations above, the strategic highway network surrounding the site is currently operating at over capacity during parts of the morning and evening peak. The additional traffic generated by the development would further exacerbate these problems. It is considered essential therefore that any redevelopment of this site seeks to mitigate this impact by improving accessibility and linkages between the site and key local amenities, through measures to reduce reliance on the car. Such measures would include improvements to cycle access, improvements to the pedestrian environment and control of spillage of parking beyond the application site, which could further impact on traffic movements, through the introduction of a controlled parking zone.
- 6.123 This application proposes the introduction of a number of improvements to pedestrian and cycle access, providing for improved access to the High Street to deliver enhanced accessibility through the site, including the provision of a new pedestrian crossing to the High Street, providing a link to the Park and beyond and a condition is recommended requiring the submission of a programme for the delivery of the off-site works that are identified within the various reports supporting this planning application and are summarised in the Traffic and Transportation observations above to address improvements to the pedestrian environment identified within the PERS audit, to commit to consultation on and implementation of a Controlled Parking Zone, and to the provision of a car club. Given this, it is considered that the application seeks to provide appropriate mitigation for the traffic generated by the development and minimise car use and in the balance, the impact of the development on the local highway network is acceptable.

Trees

- 6.124 Considering the size of the site there is relatively little tree cover. In addition the tree cover generally in existence on the University Campus site is of relatively poor quality with many trees in poor locations to ensure sufficient protection during development.
- 6.125 The most significant areas of trees on the Campus site are those that line the boundary with the residential properties in Derby Road and to the east of the 'gymnasium'. However, as reflected in the submitted tree survey, the overwhelming majority of these trees are of relatively poor quality and life expectancy.
- 6.126 The Arboricultural Report submitted with the application confirms that of the 128 categorised trees on the University Campus site, 19 are Category B (trees of moderate quality and amenity value) and 105 are Category C (trees of low quality or small specimens with a relatively low amenity value). On the High Street/College Court section of the site there are overall fewer trees, but 6 of these are Category A trees (trees of high quality and amenity value). It is proposed to remove 12 trees within the High Street/College Court section of the site, including 4 Category A trees. It is always regrettable to remove such quality trees. However, it is recognised that to achieve a comprehensive

redevelopment of the site this cannot be avoided given their siting where it is anticipated that roads and buildings will need to be located.

- 6.127 The Arboricultural Report confirms that all trees removed will be replaced where possible with semi-mature native trees. It is considered therefore that overall there will be no net loss in tree cover and indeed there is likely to be a net increase. When balanced against the regeneration benefits of the scheme the proposals to remove trees on site are considered acceptable.

Biodiversity

- 6.128 The applicant has submitted an ecological appraisal of the proposed development based on surveys undertaken from outside of the Middlesex University Campus boundary and ecological reports submitted in support of an earlier planning application for redevelopment of the previous Middlesex University Campus site considered under reference P12-00732PLA. The report concludes that the Tara Kindergarten building hosts a small pipistrelle bat roost and the remainder of the site contains habitats suitable for use by roosting bats, black redstarts and common reptile species. The report states that further surveys would need to be undertaken to determine whether or not these species are present, and if so to inform a mitigation and enhancement strategy. However since they did not have easy access to the main Middlesex University campus part of the site they have not undertaken the detailed surveys.
- 6.129 In light of this a comprehensive suite of worse case mitigation measures in relation to each of the protected species that could be present has been provided. These demonstrate that should they be present the favourable conservation status of each of the species should be maintained post development and that adequate mitigation/ compensation could be provided within the parameters of this hybrid and outline scheme. In summary the mitigation strategy is as follows:
1. Bats – the provision of replacement roosts for crevice dwelling species of bats (such as pipistrelle), a roof void for brown long eared bats and a densely planted area for a stand alone hibernation roost.
 2. Reptiles – translocation to a retained 'biodiversity area' and potentially off site to a suitable receptor site
 3. Black redstart - site proposals include features such as brown roofs and ledges that would provide habitat for this species

Planning policy

- 6.130 Paragraph 99 of the government guidance on biodiversity in the planning system (Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System, not revoked by the NPPF) states that:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left

to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a licence under the procedure set out in section C below.”

- 6.131 Natural England’s Standing Advice replaces the individual comments that Natural England used to provide to local authorities on applications that affect protected species. In relation to the exceptional circumstance test their advice states that:

“There are some occasions when it is appropriate to condition surveys, usually where additional surveys are likely to be required but only if the full impacts of the proposal are understood at the planning application stage. Further survey work may be required for instance to inform the detailed mitigation, or where there may be a time lag between granting of permission and the development commencing. In these cases, a condition could be used to secure additional/updated ecological surveys to ensure that the mitigation is still appropriate for the current situation. This is particularly important for outline applications or multi-phased developments.”

- 6.132 The applicant has set out the ‘exceptional circumstances’ which they consider should be applied to this planning application with the result that additional surveys are carried out after planning permission has been granted. These are as follows:

- Ownership - the western section of the application site (University Campus) is in the ownership of InPath who have submitted their own planning application for the site (now refused planning permission) and was therefore, not accessible to the applicant’s surveyors.
- Timescales - the programme currently envisages a start date on site of mid 2014 at the earliest and different phases may take much longer to be implemented
- The nature and scope of the application – the application is a hybrid application i.e. detailed in respect of the Broadbent building and an outline application reserving all matters apart from access with reserved matters applications determining the precise layout of the scheme, its scale, its appearance and its landscaping. The applicant has demonstrated how appropriate mitigation could be accommodated within the scheme .
- Worse case scenario mitigation – - the applicant has submitted details of the “worse case scenario” mitigation described above which could be provided within the parameters of this hybrid and outline scheme and would ensure the provision of adequate and appropriate mitigation and would not impact upon the financial viability of the scheme.

Legislation

- 6.133 All bats are protected under the 1981 Wildlife and Countryside Act as amended and the European Habitats and Species Directive (92/43/C) enacted in the UK through the Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations). Bats and their shelters (roosts) are protected under this legislation and it is illegal to disturb roosting bats without first obtaining the relevant licence from the Statutory Nature Conservation Organisation (Natural England).
- 6.134 When dealing with cases where a European protected species may be affected, a planning authority is a competent authority within the meaning of The Habitat Regulations, and therefore has a statutory duty to have regard to the requirements of the Habitats Directive in the exercise of its functions.
- 6.135 Recent case law in relation to bats and development sites (Morge vs Hampshire County Council) suggest that the council will need to be satisfied that any necessary licence for development works affecting bats is likely to be granted by Natural England before granting planning permission. In order to be satisfied that this is the case the council needs to determine whether the proposed development meets the tests of The Habitat Regulations. The applicant has set out how the proposed development would meet the three tests of the habitat regulation in respect of the application site. These are as follows:
- 6.136 Test 1: The purpose of the actions authorised must be for “preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”
- 6.137 In this case the applicant considers that the proposals advance a comprehensive and holistic strategy for the future regeneration of the site which is in line with local, regional and national planning policy.
- 6.138 Test 2: There must be “no satisfactory alternative” to the actions authorised
- 6.139 The applicant has demonstrated that the favourable conservation status of bats will be maintained post development (see Test 3 below). The development seeks to provide much needed regeneration of this site in a comprehensive manner, consistent with the various policy documents referred to in this report and is in compliance with the Ponders End Central Planning Brief which has been subject to significant public consultation (including the consideration of alternative options for the site). It is therefore considered that there is no satisfactory alternative to development of this site as without this the aforementioned regeneration objectives will not be met and the aspiration of the Ponders End Central Planning Brief would not be delivered
- 6.140 Test 3: The actions authorised “will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range”.
- 6.141 The Design and Access Statement, Ecological Report, and the Illustrative Bat Mitigation Measures Strategy drawing dated 17th December 2012).

These documents demonstrate how the proposed development would be unlikely to be detrimental to the maintenance of the favourable conservation status of bats in their natural range.

Summary

- 6.142 The applicant has provided the council with sufficient information for the council to determine that with appropriate mitigation provided, the proposals are unlikely to have an adverse impact on protected species and have demonstrated that such mitigation even in a 'worse case' scenario can be provided within the context of this hybrid and outline scheme. They have also demonstrated how the proposed development complies with planning policy, wildlife legislation (in particular The Habitat Regulations) and recent case law in relation to European protected species. As such, subject to conditions there should be no objections to the proposals

Noise

- 6.143 The Noise Assessment submitted with the application concludes that appropriate mitigation measures can be put in place to ensure that acceptable noise levels within the proposed dwellings can be achieved and this can be secured by condition.
- 6.144 Some noise and disturbance to existing adjoining residents is inevitable during the construction phase. A condition is recommended to secure the submission of adherence to a construction management plan to minimise this.

Air Quality

- 6.145 The site is located within an air quality management area and the applicant has submitted an air quality statement which seeks to address the air quality issues associated with the proposed development. The key influences on air quality within the development are vehicular emissions and the combined heat and power plant supporting the on-site heating network.
- 6.146 The Air Quality Assessment submitted with the application concludes that "the impacts of increased emissions arising from traffic generated by the proposed development are predicted to be imperceptible and air quality within the development site is predicted to be acceptable. Overall air quality impacts are considered insignificant". The conclusions of this report are not disputed
- 6.147 During the demolition/construction phase of the development there is a risk of dust being generated and causing nuisance issues to surrounding business and residential premises. For this reason a condition covering measures to control dust through the submission of a construction management plan on site will reduce the risk of dust issues occurring.

Impact of the development on adjacent site and occupiers

- 6.148 To the north the application site adjoins the existing industrial units fronting Queensway and a small terrace of residential properties.
- 6.149 The application confirms the retention of the Caretaker's Cottage, immediately to the rear of the terrace of houses and therefore the

development would have no greater impact on light and outlook for these properties than presently exists. It is proposed to use the Caretaker's Cottage for light industrial purposes. Light industrial uses by definition are uses that are compatible with adjacent residential uses and subject to conditions controlling hours of operation should not give rise to undue noise or disturbance detrimental to the adjoining residential occupiers.

- 6.150 This is an outline application and therefore the precise location of buildings on the site is not fixed. Nevertheless, the indicative illustrative layout submitted demonstrates that the residential blocks can be sited so as to ensure there is no undue impact on the operation of the industrial units to the north.
- 6.151 The application site does extend to include the surface car park to the rear of the Enfield Enterprise Agency (EEA), thus removing the parking facilities that support these businesses. However, the application confirms that the 47 spaces taken can and will be replaced within the application site, primarily within the multi-storey car park to the Queensway frontage that is to be retained. A condition is recommended to secure this so as to ensure the development does not prejudice the continued use of this building for industrial purposes.
- 6.152 Tracking drawings have also been submitted to demonstrate that the removal of the car parking area to the rear would not prejudice the ability of servicing vehicles to enter the site and turn so as to be able exit in a forward gear.
- 6.153 The EEA have raised concerns, amongst other things, about the indicative pedestrian route that is shown to the west of the multi-storey car park on the strip of land that forms their access to the site. Whilst it is acknowledged that the GLA are keen to promote this as a pedestrian access into the site, the proposals are only indicative, are not included within the application under consideration and will therefore require a separate planning application if they are to be pursued. As required by the GLA, the applicant has sought to demonstrate that the application under consideration does not prejudice the delivery of this link at some point in the future should discussions with the EEA prove successful.
- 6.154 Other issues raised by the EEA in terms of the ownership status of the existing car park and terms for provision of alternative parking spaces are beyond the remit of the planning application and fall for consideration in any negotiation process between the applicant and the EEA in terms of site acquisition.
- 6.155 To the east the bulk of the site fronts the High Street and therefore whilst the application proposes an increase in the height and scale of buildings to this frontage, given the nearest properties are on the other side of the High Street, there would be no undue adverse impact in terms of light, outlook or privacy.
- 6.156 The application site also bounds the Mosque to the north/east. The application provides for the creation of a widened pedestrian route through into the site from the High Street at this point, enhancing the setting of the Mosque and providing an area for congregation. The illustrative layout demonstrates that there is opportunity to extend on from the rear of the Mosque to provide scope for expansion if required or community or light industrial space, with residential accommodation over. This would require

more detailed assessment once reserved matters come forward but the proposals in their present form are not considered to prejudice the existing Mosque.

- 6.157 To the west the site adjoins Kingsway and the terraced properties that characterise this road. The building nearest this boundary is the Listed Broadbent building. There is already a certain level of overlooking from this building to these residential properties, although clearly given the former educational use, the building would not have been in occupation consistently over a 24 hour period. The introduction of residential units does bring with it a change in the nature of activity on the site and residential units would normally be occupied in the evenings and over weekends. The Listed building is generally located in excess of 13m from the site boundary, and minimum window to window facing distances are exceeded. However, there would be 2 units within the listed building, to the first and second floor, in the north west corner of the building, which given the proximity of the building to the site boundary (approximately 4m), and the limited size of the rear gardens of the adjoining Kingsway properties that would directly overlook these existing residential properties. This has not been satisfactorily addressed within the application at this stage, and consideration would need to be given to obscuring the glazing to the west facing elevation of the building at this point, whilst having regard to its listed status. It is recognised that there is a solution to this issue and a condition is recommended to address this matter.
- 6.158 To the south the site adjoins Derby Road, Loraine Close and College Court. The illustrative layout provides for the erection of a terrace of houses running broadly parallel with the southern boundary where it backs onto Derby Road, consistent with the aspirations of the Ponders End Central Planning Brief. The Parameters Plan that forms part of the application indicates that these dwellings would be generally a maximum of 3 storeys in height, increasing to 4 storeys for part of the length of the terrace. The Council's distancing standards, as set out above would normally look for a minimum of 11m to a site boundary. In addition, the distancing standards look to ensure that the minimum window to window distance between facing windows is 25m, to safeguard the privacy of existing and future residents. Whilst the minimum 11m distance to the site boundary, is not always achieved, a minimum 25m facing distance is and is generally well exceeded ensuring there should be no loss of privacy within the dwellings. However, there is some concern about the extent of the 4 storey part of the building and this needs further consideration at detailed design stage to ensure there is no undue overlooking of the garden areas and that the buildings do not dominate the outlook to the rear of these existing properties. This is recognised within the Parameters Plan and can be assessed and considered in greater detail at reserved matters stage.
- 6.159 Concerns have been raised by residents of Loraine Close to the south about overlooking and also security of their rear gardens, given the proposals would provide for the opening up of the area to the rear of their properties with the provision of the new vehicle connection. The application is in outline form and therefore the detailed design of and configuration of buildings to rear of Loraine Close is not yet fixed. However, it is accepted that the development can be accommodated whilst safeguarding the privacy of the occupiers of these properties. It is also accepted that with the provision of appropriate

boundary treatments and landscaping the security of these properties would not be unduly compromised.

- 6.160 The application includes the existing car parking area in front of the residential properties in College Court. However, it is not proposed to build on this area, but to redesign the parking area and provide an improved public realm. The new buildings to the High Street frontage, which would return to face the residential blocks in College Court would be located over 40m away and therefore would not give rise to any loss of light, outlook or privacy.

Infrastructure contributions

- 6.161 The Director of School's and Children's Services has requested a contribution of £2,216,156.00 towards local education provision arising from the number of residential units proposed.
- 6.162 Core Policy 46 identifies affordable housing provision and public transport improvements as the highest priority when considering the financial and in kind contributions that any development scheme is to make, although it is noted that the more recent S106 SPD identifies 'learning and skills' as of highest priority also .
- 6.163 The scheme proposes the provision for 30% affordable housing on site. In addition and integral to the scheme is the reprovision of the library and additional community space and the creation of the new links to the High Street, all of which are regeneration aspirations for this site. The viability assessment submitted with the application has been reviewed independently and the consultant has confirmed that at the present time this is the optimum level of contributions that can be secured from the scheme. Accordingly, at the present time the scheme is not able to make the education contribution referred to above and remain viable. A small amount of surplus (circa £125,000) has been identified for off-site works but this will not meet the education requirement and it is considered more appropriate to allocate this contribution to address the mitigation measures needed to minimise car access to the site and the spillage of parking beyond the site, in the form of car club provision, consultation on and implementation of a Controlled Parking Zone, bus stop improvements etc.
- 6.164 Nevertheless, as this is an outline application and involves a development that will take place over several phases and over several years it is considered necessary that a review mechanism is secured to ensure that viability across the development is reviewed over the phases to identify if any additional contributions can be secured as development progresses. This is something the GLA have requested to establish if the development is able to accommodate additional affordable housing and therefore the mechanism could also be used to establish if additional contributions could be delivered that could make at least a proportional contribution towards education provision. As this planning application cannot be the subject of a traditional S106 Agreement a mechanism needs to be secured to achieve this.

Mayors CIL

- 6.165 The Mayoral CIL came into force on 1st April 2012 and for Enfield this imposes a charge of £20 per sq.m (GIA) of new development.

- 6.166 The viability assessment that accompanies the planning application estimates an initial CIL charge in the order of £0.9m for the proposed scheme. Given the phased nature of the development and the intention to discharge reserved matters on a phase by phase basis, CIL will be calculated and paid on a phase by phase basis.

Equalities Impact Assessment

- 6.167 An Equalities Impact Assessment has been submitted with the application and this gives due regard to the impact of the development on the relevant groups within the protected characteristics schedule of the Equalities Act 2010. The scheme would make provision for 10% wheelchair accessible units and with the exception of the proposed residential units within the Listed Broadbent building, which imposes unusual constraints, would comply with the Lifetime Homes Standards and conditions are recommended to secure this. Conditions are also recommended to require the submission of reserved matters for the detailed design and layout of the scheme, therefore further consideration will be given at this stage to ensure safe and convenient access for all. In summary and subject to the conditions recommended, the scheme proposed would not have any undue adverse impact on the relevant groups.

7 Conclusion

- 7.1 This former University campus is a key site within Ponders End and is important to the delivery of the Council's regeneration aspirations. The High Street frontage is similarly important to these regeneration aspirations and it is considered important that the two sections need to work together and therefore be considered holistically and comprehensively to ensure that the Campus site is appropriately integrated with the High Street and key facilities along it and beyond and that this integration takes place commensurate with the provision of a new residential community on the campus site. This development deals with the two sections in such a comprehensive manner, delivers a number of key aspirations for the site - a new Library to the High Street frontage and key pedestrian links to ensure the new residential community to be created is properly integrated, and in providing 30% affordable housing and a minimum of 50% family sized units proposes a sustainable and balanced community that will benefit the wider area. In addition, the proposals make provision for the refurbishment and re-use of the Listed Building, Gymnasium and Caretaker's Cottage and the provision of an acceptable level of employment space across the site. Whilst this is an outline planning application, the documents submitted in support of the application demonstrate that the level of development proposed can be accommodated within a good quality development meeting the relevant design standards. Overall therefore, and whilst recognising that the not all of the infrastructure contributions can be made, at least at this stage, it is considered that the development overall proposes the optimal mix of benefits for the site and it is therefore recommended that planning permission be granted.
- 7.2 However, as this is an application made by the Council, it is not possible to enter a conventional S106 to secure some of the benefits proposed within the scheme. Accordingly, a range of special conditions will need to be drafted to address this fact, to set down certain minimum parameters for development bearing in mind the outline nature of the application and to require the

submission of further details of the development proposed. As this is a particularly large and complex scheme, the wording of these conditions has not yet been fixed although the issues to be addressed by condition and or legal agreement have been highlighted throughout this report and are summarised below. Members are being asked in considering the officer recommendation to grant planning permission, to also grant delegated powers to officers to agree the final wording for these conditions and mechanisms to secure the delivery of those aspects of the scheme that cannot be dealt with through condition.

8 Recommendation;

1 That, subject to referral to the Great London Authority, planning permission be to be granted in accordance with Regulation 3/4 of the Town and Country Planning General Regulations 1992 subject to conditions to address the following issues: (see schedule below) for the following reasons:

i) The application proposes a comprehensive approach to the development of the site, providing for its proper integration into the existing community and its facilities and would deliver a balance and mix of residential accommodation, including the provision of affordable housing, to facilitate the delivery of sustainable new community on the site consistent with the regeneration aspirations for area. In this respect the development complies with London Plan policies 2.13, 2.14, 3.3, 3.4, 3.5, 3.8, 3.9, 3.16 and Core Policies 2, 3, 4, 5, 9, 40 and 41 of the Core Strategy, the emerging North East Enfield Area Action Plan , Ponders End Central Planning Brief and National Planning Policy Framework

ii) The application, whilst in outline form, provides sufficient information and commitment through the Design and Access Statement, Parameters Plan and Development Specification and Design Principles Reports to confirm that the development will provide for a quality residential led development that will provide a safe and good quality environment for future residents, making appropriate provision for play, connectivity to existing facilities and will provide good quality homes in accordance with the relevant guidance. In this respect the development complies with London Plan policies 3.5, 3.6, 5.2, 5.3, 5.7, 5.10, 5.11, 5.13, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and Core Policies 4, 9, 20, 21, 30, 40 and 41 of the Core Strategy, the emerging North East Enfield Area Action Plan, Ponders End Central Planning Brief and the National Planning Policy Framework.

iii) The application makes appropriate provision for retail, employment and community space, to ensure there is no net loss of existing provision, and for the provision of a replacement library to the High Street frontage to strengthen the existing offer to the High Street. In this respect the development complies with London Plan policies 3.16 and 7.1 and Core Policies 9, 40 and 41 of the Core Strategy, emerging North East Enfield Area Action Plan and Ponders End Central Planning Brief.

iv) Whilst recognising the redevelopment as proposed will have an impact on the local highway network, the development seeks to make appropriate provision to minimise the generation of car borne trips through improving the connectivity of the site to existing facilities and through commitment to a suite

of off-site highway works. In this respect the development complies with London Plan policies 6.3, 6.9, 6.10 and 6.13, Core Policies 24,25 and 26 and Policy (II)GD6 of the Unitary Development Plan and the National Planning Policy Framework.

v) The development provides for the retention and appropriate conversion of the Listed Buildings on site and their integration into the proposed new community. In this respect the development complies with London Plan policies 7.8 and 7.9, Core Policy 31 of the Core Strategy, the Ponders End Central Planning Brief and National Planning Policy Framework

- 2 That officers be granted delegated authority to finalise the precise wording of the conditions to cover the issues identified within the report and summarised below.**
- 3 That the associated Listed Building Consent application be referred to the Department for Communities and Local Government once additional information has been received.**

Conditions in summary

- 1 Compliance with approved plans
- 2 The site to be in one ownership prior to implementation of any part of the development (excluding demolition of Police Station)
- 3 Prior to submission of first reserved matter, the submissions of a detailed phasing plan to show:

phasing of build across the site

demolition plan

phasing of provision of access - pedestrian, vehicle and cycle and the trigger points for provision

Phasing of infrastructure provision and trigger points

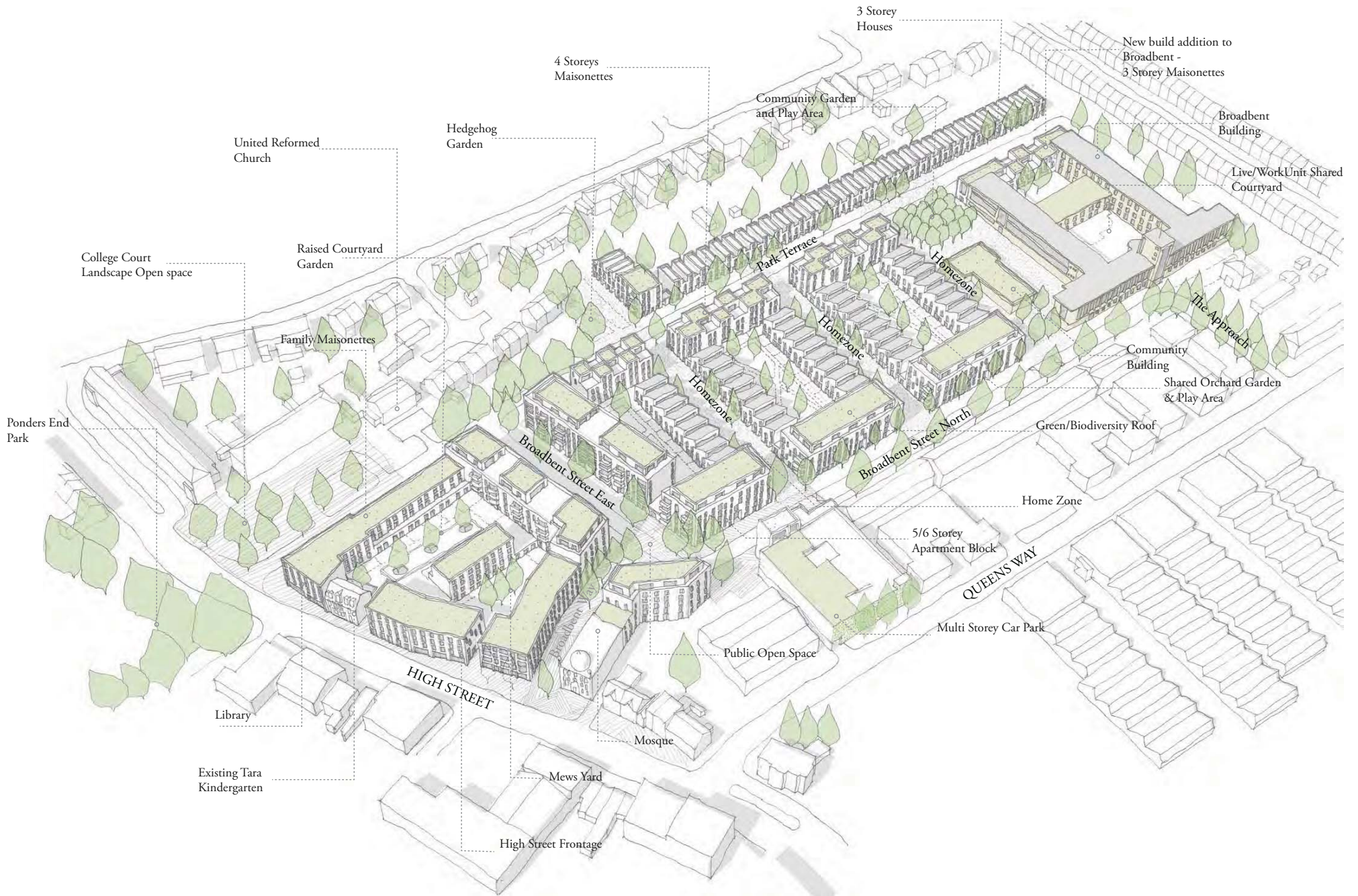
The submission of reserved matters to then reflect the phases set out pursuant to the approved phasing plan, unless an alternative phasing plan is first submitted and approved .

- 4 Reserved matters – siting/layout
- 5 Reserved matters – external appearance
- 6 Reserved matters – design
- 7 Reserved matters – landscaping, This to require initially a landscaping strategy for the whole site and then detailed landscaping/planting plans per phase
- 8 Reserved matters submissions to meet comply with the Design and Access Statement, Parameters Plan and Development Specification and Design Principles
- 9 Each relevant application for reserved matters to include a daylight and sunlight report
- 10 Details of external materials prior to erection of superstructure of each building
- 11 Prior to commencement of each phase details full details of ground surface materials, fences, gates and other boundary treatments

- 12 A minimum of 30% affordable housing across the site and a mix of tenures per phase and a minimum of 30% intermediate housing.
- 13 A minimum of 50% 3 bed+ units across the site.
- 14 A minimum mix of units across the private and social rented sector.
- 15 Details of a mechanism to review viability of the scheme as development progresses with a view to increasing affordable housing and off site contributions.
- 16 The library shall not be demolished until provision is made for temporary facilities
- 17 No net loss of parking provision for Enfield Enterprise Agency or for College Court throughout the development and a minimum provision for Enfield Enterprise Agency and College Court at the end of the development.
- 18 That the car parking area to the rear of Enfield Enterprise Agency shall not be the subject of development or incorporated into the site until parking, servicing/access arrangements have been agreed in accordance with a strategy
- 19 Construction management plan to include measures to address temporary relocation of facilities as development progresses across the site
- 20 Max number of 408 residential units
- 21 Minimum/maximum level of B1 space
- 22 Minimum/maximum level of community space & library space
- 23 Maximum size of retail units and no merging of units to create larger retail space unless agreed.
- 24 Footway width to the High Street to be minimum of 3m, clear of loading bays
- 25 No A3/4 uses in those unit that have a rear elevation opening up on to a residential courtyard/mews
- 26 Details of extract ventilation/flues for A3/4 uses
- 27 Details of shopfront design
- 28 Max opening hours for the range of uses proposed
- 29 All residential units to meet minimum London Housing design guide standards in terms of floor areas, room sizes and amenity space
- 30 Minimum size of communal courtyards as set out in parameters plan
- 31 Minimum 10% wheelchair accessible/adaptable units
- 32 Compliance with lifetime homes standards
- 33 Minimum/max number/ratio of cp spaces min ratio 0.76 spaces per unit for residential (net of visitors, car club, College Court and EEA spaces), a minimum commercial ratio, a minimum number of spaces for community use, a standard of 5% of residential units for P2W parking, 2 spaces to be dedicated for exclusive car club use, a level of visitor car parking
- 34 Provision of car park management plan – interim arrangements and final arrangements as necessary
- 35 Details of form and construction of the access roads and junctions, to make provision for turning for 10.3m refuse freighter and to meet maximum reversing distances for fire appliances
- 36 Details of works to multi-storey car park, layout, vehicle and ped access (including pedestrian access to west of multi-storey car park), external treatment and lighting, to meet 'ParkMark' standards and investigation of use of living wall
- 37 Servicing Management Plan
- 38 Compliance with construction logistics plan
- 39 Travel plan for all uses
- 40 Mechanism to secure delivery of a car club for the benefit of new residents and the wider public
- 41 Provision of electric charging points
- 42 Provision of cycle parking ratio

- 43 Provision of disabled car parking – dedicated space per unit & additional % provision
- 44 Provision of showers/changing facilities within B1 space
- 45 Environment Agency conditions
- 46 English Heritage Archaeology conditions
- 47 Minimum level of playspace, 3000sqm
- 48 Noise mitigation measures to be introduced to residential
- 49 Remediation strategy for contamination
- 50 Treatment/remediation of any unexpected contamination
- 51 No development hereby until an ecological impact assessment of the proposals has been submitted to and approved in writing by the council.
- 52 No development until an outline ecological mitigation and enhancement strategy has been submitted to and approved.
- 53 No development hereby permitted shall commence until an outline landscaping scheme and management plan has been submitted to and approved
- 54 No phase of any development permitted shall commence until an up to date and detailed ecological impact assessment and an ecological mitigation, enhancement and management strategy (to be informed by up to date ecological surveys if required) of that phase, in line with the outline ecological mitigation and enhancement strategy.
- 55 Details of energy modelling to verify projected carbon dioxide reductions
- 56 All apartments and non-domestic uses to have potential to be connected to the site heat network
- 57 Prior to commencement details of sizing of CHP and heat load profiles
- 58 Threshold for trigger of CHP 60% of build out of residential units
- 59 Minimum code 4 CSH for new build residential
- 60 Minimum BREEAM very good all non residential uses, accepting some flexibility for full compliance on the Listed Buildings.
- 61 Details of green/brown roofs and dispersal around site minimum 50%
- 62 Submission of a strategy for provision of PV across the development and compliance therewith
- 63 Tree protection and arboricultural method statement where trees identified in phasing plan for retention
- 64 No gating of main pedestrian or vehicle access routes into the development
- 65 Details of play space/equipment to be provided
- 66 Listed buildings to be maintained in a wind/water/weather tight condition until works thereon commence
- 67 No plant equipment to be provided on roofs unless first agreed
- 68 Before occupation of commercial units, CCTV traffic enforcement camera control of the new adopted access off High Street/High Street loading bays to be installed and operational
- 69 Refuse/recycling storage –details per block
- 70 The submission of a programme for the delivery of the off site highway works identified in the report and for the delivery of a Controlled Parking Zone.
- 71 The proposed commercial units shall not be occupied until the new loading bays are provided on High Street & revised waiting/loading restrictions thereon are in force
- 72 Details of the design/construction of vehicle access to College Court and Stage 2 and 3 Safety Audits
- 73 Details of design/construction/lighting of pedestrian access to High Street
- 74 Pedestrian Link to the High Street to be a minimum of 8m
- 75 Detailed design of homezones and traffic calming measures to be provided
- 76 Submission of a sustainable drainage strategy
- 77 Landscape and public realm management strategy

- 78 Lighting scheme per phase to meet lighting standard S2 under BS5489
- 79 Details of areas of public highway to be stopped up and areas to be adopted to be identified
- 80 Time limit – phasing plan and reserved matters for first phase – 5 years, last reserved matters 10 years. First phase to begin not later than 2 years from the date of approval of first phase, and last phase to commence with 2 years of approval of last phase



Axonometric sketch of The Electric Quarter

4.5 Illustrative Plans



1:1250

Ground floor plan

- KEY
- B1 units
 - Community use
 - Retail
 - Apartments
 - Townhouses
 - Maisonettes

4.9 Character & Materiality

Material Palette

Materials are selected for their durability, sustainability and beauty. The whole landscape will have a cohesive approach to the material palette, so that while buildings may be varied in form and specification, the landscape will provide a strong and consistent sense of place.

In the 'High Street Loop' area we propose granite paving as well as wide granite kerbs. Granite kerbs also extend along the Broadbent Street bend, and expand into special granite pieces, chunky pieces of stones that can accommodate the geometry of raised crossings, and raise up to be benches or low tables. These extra generous pieces will sit well alongside a

calmer blacktop for the northern footways and parking spaces along the industrial units.

The homezones and the communal spaces within the homezones have a softer materiality and tone, with different variations of clay and sand: Light bricks for the shared foot and carriage ways, Breendon gravel for tree pits, car parking and as a self-draining and malleable play surface, and sand for the play areas. Different species of mainly native trees give additional definition to the individual streets.

The architecture within the proposed masterplan is united by a commonality that is achieved through the use of brick as a single material for all buildings. The buildings appear as solid objects with punched windows rather than a clad lightweight frame. Combined with consistently deep reveals, one brick depth, this creates an impression of robustness and durability, referencing the historic stock of buildings in the area (Swan Annexe, Broadbent Building, industrial warehouses).

Architectural diversity is simultaneously offered within the development by varying of massing and typologies of buildings and the type of brick used, which ranges within a pale-buff to red-brown spectrum of colours.



Elevation A - Broadbent Street North



Elevation B - Park Terrace

Copper clad top floors with setbacks



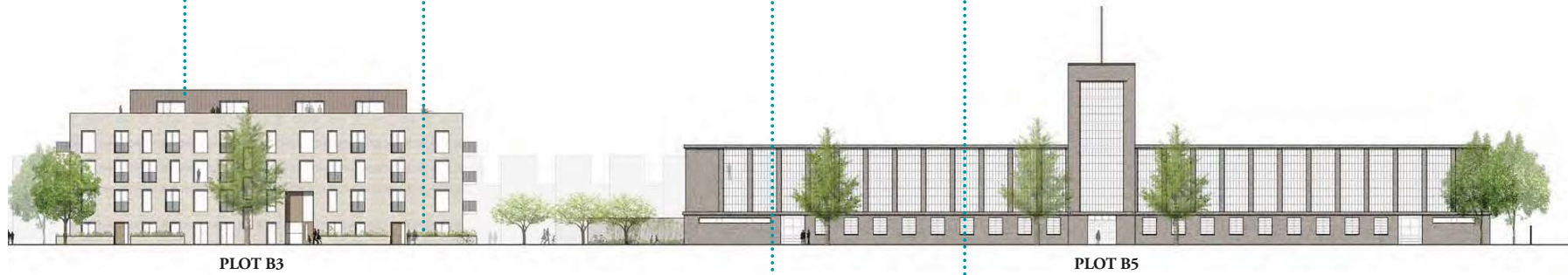
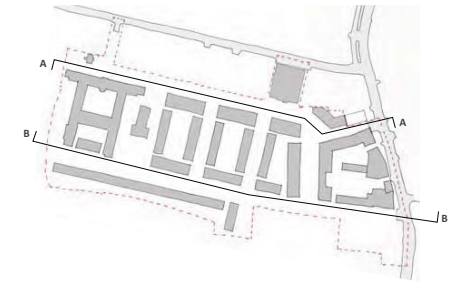
Front doors and defensible zones



Metal projecting balconies



Pale-buff brick



Character and Materiality

Hard surfaced space with trees



Reused library signage



Shopfronts in one storey retail plinth



High quality paving



Inset wintergarden balconies



Elevation C - High Street

PLOT A1

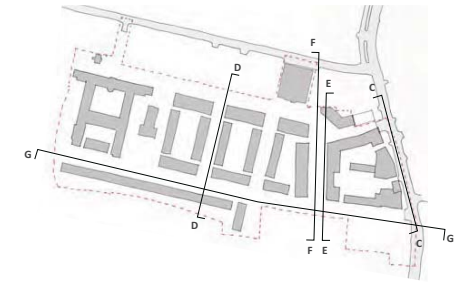
MOSQUE



Elevation D - Homezone Street

PLOT B2

PLOT B4



PLOT A1

Elevation E - Broadbent Street East



PLOT B1

CAR PARK

Elevation F - Broadbent Street East



PLOT B4

Elevation G - Park Terrace