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PLANNING COMMITTEE

Tuesday, 24th November, 2020 at 7.30 pm

Contact: Jane Creer / Metin Halil

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PLEASE NOTE: VIRTUAL MEETING

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Council website: www.enfield.gov.uk

Please click <u>HERE</u> to view the meeting or copy and paste the link below into your web browser:

https://bit.ly/3lwPuyO

MEMBERS

Councillors: Maria Alexandrou, Kate Anolue, Mahym Bedekova (Vice-Chair), Sinan Boztas (Chair), Elif Erbil, Ahmet Hasan, Michael Rye OBE, Jim Steven, Hass Yusuf, Susan Erbil, Doug Taylor and Daniel Anderson

N.B. Involved parties may request to make a deputation to the Committee by contacting Democracy@enfield.gov.uk before 10am on the meeting date latest.

AGENDA - PART 1

- 1. WELCOME AND APOLOGIES FOR ABSENCE
- 2. DECLARATION OF INTEREST
- 3. MINUTES OF THE PLANNING COMMITTEE HELD ON TUESDAY 20 OCTOBER 2020, THURSDAY 29 OCTOBER 2020 & TUESDAY 3 NOVEMBER 2020

To receive the minutes of the planning committees held on Tuesday 20 October 2020, Thursday 29 October 2020 and Tuesday 3 November 2020.

(To Follow)

4. **REPORT OF THE HEAD OF PLANNING** (Pages 1 - 2)

To receive the covering report of the Head of Planning.

5. 20/00353/FUL - 397 COCKFOSTERS ROAD, BARNET, EN4 0JS (Pages 3 - 50)

RECOMMENDATION: To Grant planning permission subject to Section106 Agreement and Conditions

WARD: Cockfosters

6. 20/02299/RE4 - WINCHMORE SCHOOL, LABURNUM GROVE, LONDON, N21 3HS (Pages 51 - 66)

RECOMMENDATION: That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, planning permission be deemed to be Granted subject to conditions.

WARD: Winchmore Hill

7. 20/01049/FUL AND ASSOCIATED LISTED BUILDING CONSENT 20/01188/LBC - CAR PARK ADJACENT TO ARNOS GROVE STATION, BOWES ROAD, LONDON, N11 1AN (Pages 67 - 192)

RECOMMENDATION: That subject to the completion of a Section106 to secure the matters covered in this report, the Head of Planning or the Head of Development Management be authorised to GRANT planning permission and Listed Building consent subject to conditions.

WARD: Southgate Green

8. **20/02112/FUL - 39A CAMLET WAY, BARNET, EN4 0LJ** (Pages 193 - 230)

RECOMMENDATION: That the Head of Development Management/the Planning Decisions Manager be authorised to Grant Planning Permission subject to planning conditions.

WARD: Cockfosters

9. FUTURE MEETING DATES

The next meeting of the Planning Committee will be Tuesday 15 December 2020.

MUNICIPAL YEAR 2020/2021 - REPORT NO

COMMITTEE:

PLANNING COMMITTEE 24.11.2020

REPORT OF:

Head of Planning

Contact Officer:

Planning Decisions Manager

David Gittens Tel: 020 8379 8074 Claire Williams Tel: 020 8379 4372

AGENDA - PART 1	ITEM	4
SUBJECT -		
MISCELLANEOUS MATT	ERS	

4.1 APPLICATIONS DEALT WITH UNDER DELEGATED POWERS

INF

- 4.1.1 In accordance with delegated powers, 375 applications were determined between 10/10/2020 and 12/11/2020, of which 289 were granted and 86 refused.
- 4.1.2 A Schedule of Decisions is available in the Members' Library.

Background Papers

To be found on files indicated in Schedule.

4.2 PLANNING APPLICATIONS AND APPLICATIONS TO DISPLAY ADVERTISEMENTS

On the Schedules attached to this report I set out my recommendations in respect of planning applications and applications to display advertisements. I also set out in respect of each application a summary of any representations received and any later observations will be reported verbally at your meeting.

Background Papers

- (1) Section 70 of the Town and Country Planning Act 1990 states that the Local Planning Authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. Section 54A of that Act, as inserted by the Planning and Compensation Act 1991, states that where in making any determination under the Planning Acts, regard is to be had to the development, the determination shall be made in accordance with the plan unless the material considerations indicate otherwise. The development plan for the London Borough of Enfield is the London Plan (March 2015), the Core Strategy (2010) and the Development Management Document (2014) together with other supplementary documents identified in the individual reports.
- (2) Other background papers are those contained within the file, the reference number of which is given in the heading to each application.



LONDON BOROUGH OF ENFIELD				
PLANNING COMMITTEE		Date: 24.11.2020		
Report of:	Contact Offic	er:		Ward:
Head of Planning	Andy Higham David Gittens Kate Perry			Cockfosters
Application Number: 20/00353/FUL		Category: Major		
LOCATION: 397 Cockfosters Road, Barnet, EN4 0JS				
PROPOSAL: Redevelopment of site and erection of part 2, part 3 storey building with lower ground level (basement) to provide 11 self-contained flats with solar panels, terraces and balconies and associated landscaping and parking.				
Applicant Name & Address:		Agent Name & Address:		
Mr Georgiou		Peter Case		
397 Cockfosters Homes Ltd		GML Architects Unit 3 1-4 Christina Street London EC2A 4PA United Kingdom		

RECOMMENDATION: GRANT subject to S106 Agreement and Conditions

Ref: 20/00353/FUL LOCATION: 397 Cockfosters Road, Barnet, EN4 0JS, COCKFOSTERS ROAD Murano House Reproduced by permission of Ordnance Survey on behalf of HMSO. ©Crown Copyright and database right 2013. All Rights Reserved. Ordnance Survey License number 100019820 North Scale 1:1250 ENFIELD Council

1. Note for Members

- 1.1 At the meeting of the Planning Committee on 29th October, Members resolved to defer consideration of this planning application for the following reasons:
 - i) to review the contribution to off site affordable housing
 - ii) to review the standard of accommodation in the two additional units proposed in terms of daylight and sunlight;
 - iii) to review the level of amenity space for the two additional units proposed
 - iv) to review the number of replacement trees proposed
- 1.2 In response, the following revisions have been made:
 - Additional tree planting so 4 trees will be planted to replace the 4 to be removed. Three to the front and one to the rear (as existing arrangement). Previously 2;
 - ii) Additional high level side windows for lower ground floats to improve light;
 - iii) A revised sunlight/ daylight report submitted confirming it meets BRE standards:
 - iv) Further detail on amenity space to show terraces for lower ground and how these will have direct access to large are of communal amenity to the rear.
 - v) An increase in the off-site affordable housing contribution from £320,000 to £405, 705.
- 1.3 The report has been updated in light of these revisions / updated information

2. Recommendation / Conditions

- 2.1 That subject to the completion of a legal agreement, the Head of Development Management / Planning Decisions Manager, be authorised to GRANT planning permission subject to conditions:
 - 1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the decision notice.
 - Reason: To comply with the provisions of S.51 of the Planning & Compulsory Purchase Act 2004.
 - 2. Unless required by any other condition attached to this Decision, the development hereby permitted be carried out in accordance with the following approved plans and documents:

PA01 Existing Site Plan

PA02 Site Photographs

PA03 Site Survey

PA04 Existing Floor Plans
PA05 Existing Elevations
PA06 Existing Street Scene

PA09 Combined Proposed Plans

PA10A Proposed Lower Ground Floor Plan

PA11A Proposed Ground Floor Plan PA12 Proposed First Floor Plan PA13 Proposed Second Floor Plan

PA14 Roof Plan

PA20 Proposed Front Elevation (East)
PA21A Proposed Side Elevation (North)
PA22A Proposed Rear Elevation (West)
PA23A Proposed Side Elevation (South)

PA24 Proposed Detail (Front)
PA25 Proposed Detail (Rear)
PA30A Proposed Sections

PA40A Proposed Street Elevations and Precedents

Design and Access Statement

Daylight Report Ecology Report

Basement Impact Assessment

Construction Traffic Management Plan

Bat Survey

Demolition Statement

SUDs Strategy

Borehole Log report

Site Waste Management Plan

Arboricultural Impact Assessment

Arboricultural Method Statement

0987.001A Tree Planting Strategy

Planning Statement Energy Statement

Transport Statement and TRICs Data

Reason: In the interest of proper planning and for the avoidance of doubt.

3. The development hereby approved shall only be laid out as 11 flats (2 x 1-bed, 7x 2-bed and 2 x 3-bed) as shown on Drawing Nos. PA10, PA11, PA12 and PA13. There shall be no deviation from the number, size or mix of units from that approved unless written permission is otherwise granted by the Local Planning Authority.

Reason: Having regard to securing an appropriate mix in the number and size of units and having regard to securing an appropriate level of contribution(s), in accordance with adopted Policy.

4. No development above existing ground level shall commence until details of the external finishing materials to be used shall be approved in writing by the Local Planning Authority. A schedule of materials and their use in the approved scheme is required and samples made available on site. A

photograph showing all samples to be inspected must be submitted. The development shall be constructed in accordance with the approved details

Reason: To ensure a satisfactory external appearance.

5. Details of any external lighting to be provided including the design, height and siting shall be submitted to the Local Planning Authority prior to installation. In addition, details regarding how the external lighting scheme has been designed to minimise light spillage and its impact on wildlife shall be submitted to and approved in writing by the Local Planning Authority. The external lighting shall be provided prior to the occupation of the first residential unit and maintained at all times thereafter.

Reason: In the interests of visual amenity, safety, residential amenity and to ensure that light sensitive receptors are not unduly affected.

6. The development shall not commence until details of the surfacing materials to be used within the development including footpaths, access roads and parking areas and road markings have been submitted to and approved in writing by the Local Planning Authority. The surfacing shall be carried out in accordance with the approved detail before the development is occupied or use commences.

Reason: To ensure that the development does not prejudice highway safety and a satisfactory appearance.

7. The development shall not commence until plans detailing the existing and proposed ground levels including the levels of any proposed buildings, roads and/or hard surfaced areas have been submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason: To ensure that levels have regard to the level of surrounding development, gradients and surface water drainage.

8. The site shall be enclosed in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The means of enclosure shall be erected in accordance with the approved detail before the development is occupied.

Reason: To ensure satisfactory appearance and safeguard the privacy, amenity and safety of adjoining occupiers and the public and in the interests of highway safety.

9. No above ground works shall commence until the details and design of the secure and fully enclosed cycle parking identified on drawing PA11 has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details before it is occupied, and the facility retained for the life of the building.

Reason: To ensure the provision of cycle parking in line with the Council's adopted standards.

10. Prior to the occupation of the development the electric vehicle charging points identified on drawing PA11 shall be installed and thereafter permanently maintained for the lifetime of the development.

Reason: To ensure that the development complies with the sustainable development policy requirements of the London Plan.

11. No above ground works shall commence until details (inclusive of elevational treatment) of the refuse storage / recycling facilities shall be submitted to the Local Planning Authority for approval in writing. The facilities shall be constructed in accordance with the approved detail prior to first occupation.

Reason: In the interests of visual amenity

12. The development shall be carried out in accordance with the energy saving measures identified in the submitted energy statement (dated June 2018).

To ensure that the development meets or exceeds the energy efficiency and sustainable development policy requirements of the London Plan and the Core Strategy.

13. The development shall be carried out in accordance with the submitted Sustainable Drainage Strategy (revision C) dated July 2018

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the site and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy

14. Having regard to condition 13, prior to the commencement of development, detailed designs, including cross sections and specifications, of the proposed SUDs measures to be incorporated in the development as identified in the approved SUDs Strategy and which shall include source control SuDs measures used upstream of the detention basin shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the site and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy

15. No above ground works shall commence until details of the internal consumption of potable water have been submitted to and approved in writing by the Local Planning Authority. Submitted details will demonstrate reduced water consumption through the use of water efficient fittings, appliances and recycling systems to show consumption equal to or less than 105 litres per person per day, unless otherwise approved in writing.

The development shall be carried out strictly in accordance with the details so approved and maintained as such thereafter.

Reason: To promote water conservation and efficiency measures in all new developments in accordance with policy 5.15 of the London Plan, CP21 of the Core Strategy and DMD58 of the Development Management Document.

16. No works or development shall take place until full details of the landscape proposals (including the size and specification of a minimum of 2 new trees to be planted in the front garden area as indicated on drawing PA11) have been submitted to and approved by the Local Planning Authority.

Details shall include:

a. Planting plans;

Authority.

- b. Written specifications (including cultivation and other operations associated
- with plant and grass establishment);
- c. Schedules of plants and trees, to include native, wildlife friendly species and

large canopy trees in appropriate locations (noting species, planting sizes and proposed numbers / densities);

- d. Implementation timetables;
- e. Wildlife friendly plants and trees of local or national provenance; and
- f. How the Landscaping conforms with the Drainage Strategy.

 All landscaping in accordance with the approved scheme shall be completed / planted during the first planting season following practical completion of the development hereby approved. The landscaping and tree planting detail shall set out a plan for the continued management and maintenance of the site and any planting which dies, becomes severely damaged or diseased within five years of completion of the development shall be replaced with new planting in accordance with the approved details or an approved alternative and to the satisfaction of the Local Planning

Reason: To ensure that the ecological value of the site is enhanced post development in line with the Biodiversity Action Plan, CP36 of the Core Strategy and the London Plan. To minimise the impact of the development on the ecological value of the area, to ensure the development provides the maximum possible provision towards the creation of habitats and valuable areas for biodiversity and to preserve the character and appearance of the area in accordance with adopted Policy.

17. Prior to commencement of demolition works a method statement agreed between an appropriately qualified ecologist and demolition contractor must be submitted to and approved in writing by the Local Planning Authority. Demolition works shall be undertaken under the supervision of an appropriately qualified ecologist [full member of IEEM and or a Natural England Bat licence holder with experience of supervising demolitions where there is a risk of bats being present] following the approved method statement which is to include the careful removal of tiles by hand, and the procedure to follow should bats or signs of bats be found. If evidence of a bat roost is found works shall cease until a licence from the Statutory Nature Conservation Organisation for development works affecting bats has been obtained and a copy submitted to and approved in writing by the council.

Reason: To ensure that protected species are not adversely affected by the demolition in line with wildlife legislation.

18. Prior to the commencement of above ground works, details of the siting and number of bat bricks/tiles and bird bricks/tubes/boxes designed into and around the new building and trees, under the supervision of a suitably qualified ecologist, shall be submitted to the Local Planning Authority for approval in writing. Confirmation of installation, prior to first occupation, together with accompanying photographic evidence shall be submitted to the Local Planning Authority.

Reason: To enhance the site post development in line with Core Policy 36 by providing suitable nesting features for birds and bats.

19. All areas of trees, hedges, scrub or similar vegetation where birds may nest which are to be removed as part of the development, are to be cleared outside the bird-nesting season (March - August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably qualified ecologist will check the areas to be removed immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded, no vegetation clearance or other works that may disturb active nests shall proceed until all young have fledged the nest.

Reason: Nesting birds are protected under the Wildlife & Countryside Act, 1981 (as amended), this condition will ensure that wildlife is not adversely affected by the proposed development in line with CP36 of the Core Strategy

20. The development shall be carried out in accordance with the submitted Site Waste Management Plan (Ref: 19180BR/swmp-001/RS/WM) dated February 2020.

Reason: To maximise the amount of waste diverted from landfill consistent with the waste hierarchy and strategic targets set by Policies 5.17, 5.18, 5.19 of the London Plan.

21. Prior to the occupation of the development, details for the provision of a communal television system/satellite dish have been submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved detail.

Reason: To mitigate the possibility of numerous satellite dishes being installed on the building hereby approved, in the interests of the visual appearance of the development, in particular, and the locality in general.

22. Prior to the occupation of the development, and notwithstanding the privacy screen details indicated on the submitted plans, full details of the proposed privacy screens for all the flats shall be submitted to and approved in writing by the Local Planning Authority. For the ground floor terraces this shall include details of the height of the screens relative to neighbouring land levels and boundary treatments.

Reason: In the interests of residential and visual amenity

23. Prior to the occupation of the development, a communal garden management and maintenance plan shall be submitted to and approved in writing by the Local Planning Authority. The requirements of the management and maintenance plan shall be implemented following occupation of the development and shall continue to operate for the lifetime of the development.

Reason: To ensure the communal amenity space to the rear of the site is managed and maintained so as to encourage its use by future occupiers in line with policy DMD 9.

24. The glazing serving the flank elevations of the development hereby permitted shall be fixed shut and in obscured glass with an equivalent obscuration as level 3 on the Pilkington Obscuration Range unless 1.7m above internal floor level. The glazing shall not be altered without the approval in writing of the Local Planning Authority.

Reason: To safeguard the privacy of the occupiers of adjoining and neighbouring properties.

25. The area annotated as 'permeable paving – maintenance access only' on drawing PA11and PA22a shall only be used for the identified purpose and at no time shall it be used for general access or for amenity purposes.

Reason: In the interests of residential amenity

26. The parking area(s) forming part of the development shall only be used for the parking of private motor vehicles and shall not be used for any other purpose.

Reason: To ensure that the development complies with Development Plan Policies and to prevent the introduction of activity which would be detrimental to amenity.

27. The development hereby approved shall be carried out fully in accordance with the submitted Construction Traffic Management Plan.

Reason: In the interests of highway safety and residential amenity.

28. The development shall be constructed so as to provide sufficient air-borne and structure-borne sound insulation against externally generated noise and vibration. This sound insulation shall ensure that the level of noise generated from external sources shall be no higher than 35 dB(A) from 7am – 11pm in bedrooms, living rooms and dining rooms and 30 dB(A) in bedrooms from 11pm – 7am measured as a LAeq,T. The LAF Max shall not exceed 45dB in bedrooms 11pm – 7am more than 10 times during the night time period. Prior to the commencement of above ground works, a scheme for mitigation measures shall be submitted to and approved by the Local Planning Authority. The scheme of mitigation shall include mechanical ventilation where the internal noise levels exceed those stated in BS8233: 2014 with the windows open. The approved mitigation scheme shall be implemented in its entirety before any of the units are occupied/the use commences.

Reason: To prevent undue noise and disturbance to future residents.

29. No development shall take place until a Construction Management Plan, written in accordance with the Mayor of London's supplementary planning guidance 'The Control of Dust and Emissions During Construction and Demolition' detailing how dust and emissions will be managed during demolition and construction work shall be submitted to the local planning authority for approval. Once approved the Construction Management Plan shall be fully implemented for the duration of any demolition and construction works.

Reason: To protect the local amenity from demolition/construction dust

30. All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority.

The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/

Reason: To protect local amenity and air quality in accordance with London Plan policies 5.3 and 7.14

3.0 Executive summary

- 3.1 Planning permission is sought for a new residential development comprising the demolition of the existing detached dwelling house and the erection of 11 self-contained flats (2x 1-bed, 7 x 2-bed and 2 x 3-bed).
- 3.2 The proposal is a revision to planning permission approved last year (ref: 18/04386/FUL) which was for 9 residential units. The only difference with the current proposal is that a basement/ lower ground level is now proposed providing 2 additional flats. This will not materially change the appearance of the approved development in the street scene as the basement will only be visible at the rear.
- 3.3 The reasons for recommending approval are:
 - i) The proposed development will appear acceptable in the street scene and would be in keeping with recent planning permissions for similar developments in Cockfosters Road and the wider area:
 - ii) Surrounding residents would not suffer an unreasonable loss of amenity as a consequence of the proposed development;
 - iii) The proposal would contribute towards much needed housing within the borough, including additional family sized accommodation;
 - iv) The proposal would provide adequate car parking, access and servicing provision;
 - v) The proposal presents an opportunity to enhance biodiversity on the site;
 - vi) The proposal would incorporate key sustainability initiatives in ecology, waste management, water, health and wellbeing, materials, pollution and surface water management in the design of the proposed development.

4. Site and Surroundings

- 4.1 The site is located on the western side of Cockfosters Road on an irregular rectangular plot of land. It is a relatively expansive site approximately 25 metres wide and 100 metres deep and has a measured area of approximately 2500sqm or 0.25 hectares.
- 4.2 The property has a large front driveway and a large rear garden that stretches down towards the golf course that runs across at the bottom of the site. There is a significant fall in levels on the site from front to back of approximately 7 metres over the 100 metre depth of the site.
- 4.3 The surrounding area is predominantly residential in nature and is characterised by large family houses on large expansive plots. However, as can be seen in the planning history section of this report, there have been a significant number of approved developments in the road over recent years for block of flats. A number

of these have been constructed and now form part of the identified character of the area.

4.4 The site is not located in a Conservation Area and does not contain a Listed Building.

5.0 Proposal

- 5.1 The proposal is for the demolition of the existing dwelling and the construction of a 3-storey plus basement flat roofed building with parking to the front of the site.
- 5.2 The development would result in the creation of 11 flats 2 x 1-bed, 7 x 2-bed and 2 x 3 bed.
- 5.3 Surface car parking for 11 cars would be provided at the front of the site along with cycle and refuse storage.
- 5.4 The proposal would retain the existing vehicle crossover to the north of the site, with a separate pedestrian access to the side.

6.0 Relevant Planning Decisions

Application Site

6.1 18/04386/FUL

Redevelopment of site and erection of part 2 part 3 storey building to provide 9 self- contained flats comprising 1 x 1-bed, 6 x 2-bed and 2 x 3-bed with solar panels, raised terraces and balconies and associated landscaping and parking (Revised Plans).

Granted with conditions 25.7.2019

359 Cockfosters Road

6.2 P12-02220PLA

Demolition of existing dwellinghouse and garage, and erection of 8 x 3-bed flats within a 2-storey building incorporating accommodation within the roof space, front, side and rear dormer windows, front and rear roof terraces, basement parking, gated entrance and detached concierge building to front.

Granted with conditions 16.7.2013

379 Cockfosters Road

6.3 P12-01695PLA

Redevelopment of site to provide a part 2, part 3-storey block of 10 self-contained flats (9 x 3-bed and 1 x 2-bed) with rooms in roof with dormer windows to all elevations, basement parking and access ramp and access to Cockfosters road.

Granted with conditions 21.10.2013

381 Cockfosters Road

6.4 17/02323/FUL

Redevelopment of site and erection of 2 storey block of 9 self-contained flats comprising 8 x 2 bed and 1 x 3 bed with basement level, terraces and balconies, installation of lift and associated parking and landscaping.

Granted with conditions

383 Cockfosters Road

6.5 17/00459/FUL

Demolition of existing building and erection of a 2.5 storey block of 12 x 2-bed and 2x 1-bed self-contained flats with accommodation and car parking at basement level and associated works

Granted with conditions 7.9.2017

387 Cockfosters Road

6.6 P13-03013PLA

Demolition of existing dwellinghouse and erection of a 2-storey block of 6 x 2 bed self-contained flats, incorporating accommodation in basement and roof space, rear balconies and terraces, basement car parking, provision of associated surface car parking together with detached refuse building to front of site.

Granted with conditions 9.6.2014

389 Cockfosters Road

6.7 TP/09/1683

Redevelopment of site to provide a detached 2-storey block of 6 flats (comprising 5 x 2-bed and 1 x 3-bed) with rooms in basement and roof, basement parking and access ramp and rear terrace/ balcony to ground, first and second floor levels.

391 Cockfosters Road

6.8 19/04385/FUL

Redevelopment of site and erection of 2 storey building to provide 14 selfcontained flats with accommodation in roof space, basement level and associated parking and landscaping.

Pending consideration

7.0 Consultations

Statutory and Non-Statutory consultees

<u>Internal</u>

- 7.1 Traffic and Transportation No objections subject to conditions to secure cycle parking, electric vehicle parking and a Construction Management Plan.
- 7.2 SUDs No objections subject to conditions in relation to provision of crosssections of source control SuDS measures used upstream of the detention basin and SUDs verification.
- 7.3 Environmental Health No objections subject to conditions relating to sound insulation, construction management (in relation to dust) and details relating to the power of non-road mobile machinery.

External

7.4 None

8.0 Public

- 8.1 Seven neighbouring occupiers were notified. The consultation period ended 28.3.2020. 2 responses were received. The following comments were made (in summary):
 - Affect local ecology
 - Close to adjoining properties
 - Conflict with local plan
 - Development too high
 - General dislike of proposal
 - Inadequate parking provision
 - Increase danger of flooding
 - Increase in traffic
 - Increase of pollution
 - Loss of light
 - Loss of privacy
 - More open space needed on development
 - Noise nuisance
 - Out of keeping with character of area
 - Over development
 - Plot is too narrow for a basement. Other flatted developments in the road have wider plots and therefore basements don't come so near the boundaries with neighbouring properties.
 - The basement construction is too close to the boundaries and will damage neighbouring properties.
 - Will cause below groundwater to disperse to neighbouring sites

- The additional car parking has removed the greenery and open space to the front which will cause additional surface water problems.
- The parking spaces are too tight.
- The front and rear building lines are way beyond what has previously been granted and will lead to the building appearing overbearing.
- The 45- and 30-degree angle rules have not been considered.
- This is just greedy.
- Existing planning permission is inappropriate this is worse.
- The applicants should be satisfied with the planning permission they have already obtained.
- Over development.
- Overbearing
- Noise disturbance
- Unacceptable scale and massing
- Lack of parking, particularly visitor parking could lead to dangerous parking practices on the road and verge
- Potential for flooding
- Adverse impact on roe deers and badgers

9.0 Relevant Policy

9.1 <u>The London Plan (2016)</u>

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing
- 3.13 Affordable housing thresholds
- 3.14 Co-ordination of housing development and infrastructure
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.10 Urban greening
- 5.13 Sustainable drainage
- 5.14 Water quality and wastewater infrastructure
- 5.15 Water use and supplies
- 5.16 Water self-sufficiency
- 5.18 Construction, excavation and demolition waste
- 6.9 Cycling
- 6.13 Parking
- 7.1 Lifetime Neighbourhoods

- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 8.2 Planning Obligations
- 8.3 Community Infrastructure Levy

9.2 The London Plan – Intend to Publish

Following an Examination in Public into the submission version of the Plan and modifications, in December 2019 the Mayor published his Intend to Publish London Plan. On 13 March 2020, the Secretary of State issued Directions to change a number of proposed policies.

In line with paragraph 48 of the NPPF, the weight attached to this Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF.

Whilst the published London Plan (2016) remains part of Enfield's Development Plan, given the advanced stage that the Intend to Publish version has reached, significant weight can be attached to it in the determination of planning applications (although there is greater uncertainty about those draft policies that are subject to the Secretary of State's Direction). The following policies are considered particularly relevant:

D4: Delivering good design

D5: Inclusive design

D6: Housing Quality and Standards

D7: Accessible Housing

D12: Fire Safety

D14: Noise

H4: Delivering Affordable Housing

H10: Housing Size Mix

GG1: Building Strong and Inclusive Communities

GG2: Making the Best Use of Land

GG3: Creating a Healthy City

GG4: Delivering the Homes Londoners Need

G1: Green Infrastructure

G5: Urban Greening

G6: Biodiversity and access to nature

G7: Trees and woodlands

SI1: Improving air quality

SI2: Minimising Greenhouse Gas Emissions

SI3: Energy Infrastructure SI5: Water infrastructure

SI7: Reducing waste and supporting the circular economy

SI12: Flood risk management

SI13: Sustainable drainage

T2: Healthy Streets

T3: Transport capacity, connectivity and safeguarding

T5: Cycling T6: Car Parking

9.3 Core Strategy (2010)

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SO4	New	homes

- SO5 Education, health and wellbeing
- SO8 Transportation and accessibility
- SO10 Built environment
- 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
- CP30 Maintaining and improving the quality of the built and open environment
- CP32 Pollution
- CP46 Infrastructure contributions

9.4 Development Management Document (2014)

- DMD 2 Affordable Housing on Developments of less than 10 units.
- DMD 3 Providing a Mix of Different Sized Homes
- DMD 5 Residential Conversions
- DMD 6 Residential Character
- DMD 7 Development of Garden Land
- DMD 8 General Standards for New Residential Development
- DMD 9 Amenity Space
- DMD10 Distancing
- DMD37 Achieving High Quality and Design-Led Development
- DMD38 Design Process
- DMD45 Parking Standards and Layout
- DMD47 New Road, Access and Servicing
- DMD49 Sustainable Design and Construction Statements
- DMD50 Environmental Assessments Method
- DMD51 Energy Efficiency Standards
- DMD52 Decentralised Energy Networks
- DMD53 Low and Zero Carbon Technology
- DMD55 Use of Roofspace/ Vertical Surfaces
- DMD58 Water Efficiency
- DMD59 Avoiding and Reducing Flood Risk DMD64 Pollution Control and Assessment
- DMD65 Air Quality DMD68 Noise
- DMD69 Light Pollution
- DMD72 Open Space Provision
- DMD73 Children's Play Space

DMD79 Ecological Enhancements
DMD80 Trees on development sites

DMD81 Landscaping

9.5 Other Relevant Considerations

National Planning Practice Guidance
National Planning Policy Framework
National Design Guide
Enfield Characterisation Study
London Housing Supplementary Planning Guidance.
S106 SPD

10.0 Analysis

Planning Background

- 10.1 Planning permission was granted (subject to conditions) under planning reference 18/04386/FUL for the redevelopment of the site and the erection of a part-2 part-3 storey building to provide 9 self-contained flats comprising 1 x 1-bed, 6 x 2-bed and 2 x 3-bed with solar panels, raised terraces and balconies and associated landscaping and parking.
- 10.2 The current proposal represents a revision to the approved scheme whereby an additional lower ground/ basement level has been added to the development. The development above ground level will remain as previously approved although amendments have been made to the front driveway layout to accommodate additional parking and cycle parking. The lower ground / basement level will provide for 2 additional flats.
- 10.3 Overall, the principle issues for consideration are:
 - Principle of the Development
 - Density, Scale and Mix
 - Design and Impact on Character and Appearance
 - Impact on Residential Amenity
 - Standard of Accommodation
 - Amenity Space
 - Highways, Access, Car parking and Servicing
 - Sustainability
 - S106 and CIL

Principle of the Development

10.4 The principle of redeveloping this site for residential purposes has already been established through the grant of planning permission which must be given significant weight in the assessment of the current proposal.

10.5 The proposal would be compatible with Policies 3.3 and 7.5 of the London Plan, Policy GG4 of the Intend to Publish London Plan and Core Policy 2 of the Core Strategy insofar as it would provide a further addition to the Borough's housing stock which actively contributes towards both Borough specific and London-wide strategic housing targets. However, this position must be appraised in relation to other material considerations including ensuring the development in terms of form and design is acceptable, achieving an appropriate residential mix as well as adequate internal floor space and layout; servicing; parking provision and residential amenity.

Housing Mix

- 10.6 In terms of housing mix, the Council's Core Strategy seeks to ensure new developments offer a range of housing sizes to meet housing need. Policy CP5 sets out a preferred housing mix of 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses, (5-6 persons) and 20% 4+ bed houses (6+ persons) for market housing.
- 10.7 The current proposal would provide 2x1 bed, 7x2 bed (4 person) and 2x3 bed units. In percentage terms, this represents 18% 1 bed flats, 64% 2-bed (4 person) flats and 18% 3 bed flats: an increase of 1 x 1 bed and 1 x 2 bed units.
- 10.8 In relation to units suitable for family accommodation, given that 7 of the units proposed are larger 2 bed 4 person flats with dedicated amenity space and access to the larger communal amenity space, it is considered appropriate to consider their potential as contributing towards the provision of family units to meet a range of housing needs within the context of a flatted development. As a result, given the current proposal is an addition to the homes previously secured through the earlier consent, the mix is considered acceptable.

Scale / Density

- 10.9 The assessment of any development must acknowledge the NPPF and the London Plan, which encourage greater flexibility in the application of policies to promote higher densities. Policy 3.4 of the London Plan in particular encourages the development of land to optimise housing potential but recognises this must be appropriate for the location taking into account local context, character, design and public transport capacity. Furthermore, the Intend to Publish version of the London Plan which must be given significant weight in this regard, does not include a policy on density with the emphasis on the development being appropriate to the character and appearance of the area albeit, it is noted that the site falls within an area with a Public Transport Accessibility Level (PTAL) rating of 1a, which would suggest that a density of 150-200 habitable rooms per hectare (hrph) may be appropriate for this location.
- 10.10 Forty-four habitable rooms are now proposed on a site measuring approximately 0.25ha, equating to a density of approximately 176hrph. The scheme therefore sits within the density range. However, as identified above, adopted and emerging policy (intend to Publish London Plan D3) acknowledges a numerical assessment of density is but one factor to consider in assessing whether the site

is capable of accommodating the proposed development. Consideration must also be given to the design and quality of accommodation to be provided, the siting and scale of the development, its relationship to site boundaries and adjoining properties and the level and quality of amenity space to support the development. These factors are considered below.

Design

- 10.11 There is clear guidance on the approach to the matter of design including the published National Design Guide. The NPPF (section 12) confirms that the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. London Plan Policy 7.1 ("Lifetime neighbourhoods") advises that the design of new buildings and the spaces created by them should "help to reinforce or enhance the character, permeability, and accessibility of the neighbourhood" while policies 7.4, 7.5 and 7.6 confirm the requirement for achieving the highest architectural quality, taking into consideration the local context and its contribution to that context. This is reflected in the emerging London Plan in Policies D4,D5 and D6Design should contribute towards creating "a positive relationship between urban structure and natural landscape features..." Policy DMD 37 (Achieving High Quality and Design Led Development") confirms the criteria upon which application will be assessed. However, it also recognised there is a degree of subjectivity in the assessment of acceptable design.
- 10.12 Cockfosters Road traditionally comprised large 1930s era dwelling houses or mock Tudor dwellings, although in more recent years, neo-Georgian dwellings/blocks of flats have tended to dominate (see planning history section of this report). The current application proposes a more modern approach to design; a similar approach to that which was previously adopted and accepted at No. 383 Cockfosters Road and more recently, when granting planning permission at this application site in 2019. This decision must be which significant weight must be given. Mindful of the advice provided by the NPPF with regards to not imposing architectural styles or tastes, the more modern design, of which similar is already evident in the street scene, is considered acceptable.
- 10.13 From the front elevation, the building would be no greater in height than the existing house or that previously approved. It would have a flat roof which would not exceed the ridge height of the existing property and the top floor would be set in by 1.6m from the southern elevation and 1.4m from the northern elevation. The top of the first floor would relate to the eaves height of the existing property to the south and would provide a visual relationship with the neighbouring property despite being very different architecturally.
- 10.14 In terms of massing and proximity to boundaries, the proposed building would be sited a minimum of approximately 2.3m from its common boundary with No.395 Cockfosters Road. To the north, it is approximately 1.8m from the common boundary with No.399 Cockfosters Road. In relation to the rear (western) boundary, shared with the golf club, the level of distancing is approximately 46m, and is commensurate with more recent developments.

- 10.15 It is acknowledged that the building would appear larger in scale and massing than the building it would replace due to the flat top design and the depth of the building. However, it would be well set back from Cockfosters Road and, as the land falls away quite significantly from the road, it will not appear visually dominant or unduly imposing in the street scene.
- 10.16 In terms of the new basement, this would not be visible when viewed in the street scene. The proposal takes advantage of the natural drop in ground levels from the front to the back of the site and the basement level would only be visible from the rear. The development is therefore considered to have an acceptable overall appearance.
- 10.17 In relation to the palette of materials, it is proposed to construct the ground and first floors with London stock brick which will match the predominant building materials used in the area. The use of bricks in a diaper pattern on the flank elevations helps to break up a façade that would otherwise appear very bland. The second floor will be finished in stone cladding which will add further visual variation and interest to the elevations and help to minimise the perceived massing.
- 10.18 It is noted that the appearance of a flatted development in particular, can be blighted by the appearance of numerous satellite dishes and television antennae. To mitigate this, it considered appropriate to seek detail, via condition, of a communal satellite dish and television antenna.
- 10.19 Taking all the above into consideration, the extant planning permission previously granted and having regard to the concerns raised by neighbouring occupiers in respect of the design and appearance of the building, the proposal is considered acceptable.

Quality of Accommodation

- 10.20 To improve the quality of new housing, new development must meet with the minimum standards contained within the London Plan (Policy 3.5 Quality and design of housing developments), Policy H10 of the London Plan (Intend to Publish), and the Mayor's Housing SPG (because the Mayor considers the size of new housing to be a key strategic issue) and, the nationally described space standards (which is concerned with internal space standards only).
- 10.21 The respective size of the units is set out below:

Flat No.	Proposed Occupancy	Adopted Minimum Standard (sqm)	Proposed Floor Area (sqm)
1	1b2p	50	70
2	2b4p	70	104
3	3b5p	86	98
4	2b4p	70	83
5	2b4p	70	92

6	2b4p	70	97
7	3b5p	86	98
8	2b4p	70	92
9	2b4p	70	74
10	2b4p	70	72
11	1b2p	50	58

- 10.22 As the table demonstrates, all the flats the meet the minimum space requirements and in the majority, of cases, significantly exceed the minimum requirements. In terms of individual rooms, the minimum floor areas for single bedrooms and double / twin bedrooms is 7.5 sqm and 11.5sqm respectively. Rooms in each unit exceed the minimum standard. At ground, first and second floor, all habitable room have front or rear facing primary windows and access to natural light and ventilation.
- 10.23 Ideally, both the 3 bed units would be at ground floor level to provide maximum access and external amenity space. As proposed only one is (and the other at first floor) but given the lift access, this is considered acceptable and would enable reasonable access to the communal amenity areas.
- 10.24 The two basement flats would be single aspect and would have rear (west) facing windows. Concern has been raised regarding the adequacy of light available to these units and in response, additional high level windows have been added to the flank elevations of these units to improve light ingress. Furthermore, a sunlight and daylight analysis (dated November 2020) has been submitted which demonstrates the available internal light levels meets BRE sun lighting and daylighting requirements. The proposed basement units are therefore considered to provide an acceptable level of residential amenity for future occupiers.

Amenity Space

- 10.25 Policy DMD9 provides the standards for the level of private amenity space needed for each unit and is primarily based upon the number of rooms and occupancy level. The standards represent the minimum, although regard must also be given to the character of the area. In this case 5sqm is required for the 1 bed 2 person flats,7sqm is required for the 2 bed 4 person flats and 8 sqm is required for the 3 bed 5 person flats.
- 10.26 Proposed private amenity space (in the form of balconies/ terraces) has been provided for each flat. Private amenity space is defined as open space which is accessible only to and screened for the purposes of the resident/residents of the dwelling. It does not include space used for purposes such as access roads, driveways, garages/car ports/car parking spaces, outdoor storage areas; or landscaped areas which provide a setting for the development such as front gardens.
- 10.27 A minimum standard of provision is necessary to ensure that any amenity space provided is functional. It is acknowledged that providing private amenity space as part of a flatted development may present different challenges than housing

- schemes due to the higher numbers of units which are accommodated and distributed across different storeys on the site. However, both types of development still need to offer access to good quality amenity space. For flats, the functions of amenity space can be divided between separate private areas.
- 10.28 In this case, ten of the eleven flats have adequate private amenity space to the rear. At ground and lower ground floor, flats 1, 2 and 3, 4 and 5 all have rear facing terraces which exceed the required space standards and provide functional and useable amenity space. It is noted that the lower ground floor terraces will be overlooked by the terraces to the ground floor flats above. This is not considered an ideal relationship. However, on balance, is not considered unacceptable given the limited number of units affected and the fact that this relationship was previously accepted. The lower ground floor flats will have their own terraces as well as direct access to the large area of communal amenity space beyond as shown on additional drawing PA09.
- 10.29 The ground floor flats also have some additional space to the front. However, given its location this space is considered of limited quality and therefore it has not been included in the private amenity space calculation. However, the front spaces do provide a setting for the flats and a barrier to the car parking which is beneficial to the scheme overall.
- 10.30 At first floor the amenity space for all flats apart from flat 8 (2b4p) meet the required minimum standard. Flat 8 has a small shortfall of 1.5 sqm (5.5sqm is provided whereas the standard requires 7sqm). However, the external amenity space provided is west facing, regularly shaped and functional as well as being readily accessible to future occupants. Furthermore, the internal living space of this flat well exceeds the minimum space requirement for a unit of this size. The extent of private balcony has been constrained in order to minimise any perceived amenity impacts on the neighbouring property and therefore, on balance, the shortfall in not considered unacceptable in this case and the residential accommodation in its totality, will provide acceptable living standards for future occupiers.
- 10.31 Flat 11 (1b2p) on the second floor only has a forward-facing balcony. Given it is positioned well above the proposed parking area and the fact it would not be overlooked, means this is considered to provide a satisfactory level of amenity for future occupiers. The amenity area exceeds the space requirement for a flat of this size.
- 10.32 To emphasises, all the flats would have access to a large area of communal amenity space at the rear which backs on to Hadley Wood Golf Course and the Green Belt. The communal amenity space would be accessed via a pedestrian route along the northern boundary. It is recommended that a condition be attached to require a management and maintenance plan for the communal amenity space to the rear of the site because if the space is maintained to a high standard it is more likely to be used by residents. The availability of this communal is also a consideration when looking at the acceptability of the private amenity space available to individual flats.

Neighbouring Amenity

- 10.33 Policy DMD 8 and DMD11 seeks to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment. In addition, Policies 7.4 of the London Plan and CP30 of the Local Plan seek to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity.
- 10.34 In this case, the properties most affected by the proposed development would be the immediately neighbouring properties at Nos 395 and 399 Cockfosters Road. Objections have been raised by both these neighbouring occupiers (summarised in section 8.1 of this report).
- 10.35 In relation to No. 395 Cockfosters Road, this property is already positioned behind the front building line of 397 Cockfosters Road by approximately 9m and therefore the existing dwelling already breaches a 30 degree and 45 degree angle from the front windows of the neighbouring property. The current proposal would be positioned on the same footprint as the existing dwelling. However, the built form is different, and the key consideration is whether the design, scale and massing of the new building would have an unacceptably greater impact than the existing hipped crown roof dwelling in terms of access to light and outlook and whether it would appear unacceptably overly dominant.
- 10.36 The flat roof at first floor would measure 1m higher than the existing eaves height. The second floor would be set in a minimum of a further 0.5m and would extend vertically to the same height as the existing hipped crown roof. On balance, therefore this is considered to have no greater impact than the existing building in relation to number 395 Cockfosters Road. In particular, the relative orientation of the buildings is such that access to sunlight will not be unduly adversely affected. This relationship was previously accepted when granting planning permission for the redevelopment of this site
- 10.37 At the rear, the new building would not breach a 45 degree angle from number 395 Cockfosters Road at ground floor level. At first floor, the 30 degree angle will be intercepted slightly. However, given the separation (approximately 9m when measured along the angle line) the limited breach in the 30 degree angle is unlikely to have an unacceptable impact sufficient to warrant refusal of the planning application. This relationship was also previously accepted when granting planning permission for the redevelopment of this site.
- 10.38 It is noted that objections state that the building proposed is larger than the previously approved application and that it will extend further to the front and rear of the site. However, this is not the case above ground level. Above ground level the building will be the same as the previous approval and therefore is considered not to have a greater impact. The basement will be largely contained below the ground level of the neighbouring sites and will not have a greater impact on neighbours in terms of loss of light or outlook, and nor will it appear overly dominant.

- 10.39 With regard to privacy, there are no primary habitable room windows in the flank elevation towards 395. A condition is recommended to ensure that windows in the flank elevation are non-opening and obscure glazed unless 1.7m above internal floor level. The proposal will also involve the addition of terraces and balconies to the front and rear of the property. Concern has been raised that at the rear these will result in unacceptable overlooking of the neighbouring site and in particular their private amenity area. Having regard to this concern, the ground floor terraces step down to minimise any perceived overlooking impacts.
- 10:40 Along the boundary with No 395, it has been confirmed on drawings PA11and PA22a that this area will be for maintenance access only and will not be designated amenity space. It is recommended that this be secured by condition. Balconies at first and second floor are set in from the boundaries and are aligned with the flank elevations of the building to minimise overlooking. The proposed balcony at second floor to flat 9 is a Juliet balcony to reduce perceived impacts.
- 10.41 It is recognised that due to the number of prospective occupiers and the balconies proposed, a greater sense of overlooking could arise for the immediately neighbouring occupiers. However, this can be mitigated through the provision of privacy screens which will prevent direct views into the immediately neighbouring sites. It is recommended that screen details and their implementation and retention be secured by condition. It is noted, that notwithstanding the privacy screens identified on the submitted plans, in some cases greater screening may be required to the southern and partial western boundaries. These revised details can be agreed at the condition stage. Again, this relationship was previously accepted when granting planning permission for the redevelopment of this site.
- 10.42 In relation to the impact on No. 399 Cockfosters Road, this property is located to the north of the application site and contains a 2 storey detached dwelling with a linked single storey outbuilding in the rear garden. The building proposed at 397 Cockfosters Road has been designed so as not to breach a 45 degree angle from the nearest front or rear ground floor windows of this property. At first floor the 30 degree angle will be breached by the side wall of flat 6. However, this would be positioned at least 12.5m away when measured along the angle line and given the distance and limited nature of the breach is not considered unacceptable. This relationship was previously accepted when granting planning permission for the redevelopment of this site
- 10.43 In relation to privacy, a condition is recommended to ensure that any flank windows are obscure glazed and non-opening unless 1.7m above internal floor level. As with the relationship with No. 395 Cockfosters Road, revised details of privacy screens will be required by condition to ensure that there is no direct overlooking of primary amenity space and views are restricted to long views down the garden.
- 10.44 With regard to concerns raised about additional noise and disturbance, it is acknowledged that the proposed development will intensify the use of the site. However, given the spacing and separation to neighbouring properties and the overall size of the subject site, the quantum of development proposed is not

considered unacceptable in this context. Certainly, it is not considered the addition of 2 units would give rise to harm above that previously accepted. Furthermore, it will contribute to much need housing (including family accommodation) which will contribute to the strategic housing needs of the borough. A construction management plan has been provided which demonstrates how impacts will be minimised during the construction period. It is recommended that compliance with the submitted construction management plan be required by condition.

Highway Safety

10.45 Policy 6.3 of the London Plan and Policies T3 and T4 of the Intend to Publish London Plan requires that the impact of development proposals on transport capacity and the transport network are fully assessed. The proposal must comply with policies relating to better streets (Policy 6.7), cycling (Policy 6.9), walking (Policy 6.10), tackling congestion (Policy 6.11), road network capacity (6.12) and parking (Policy 6.13). Policies DMD45 & 47 provide the criteria upon which developments will be assessed with regard to parking standards / layout and access /servicing.

Parking / Traffic Generation

Number of beds	4 or more	3	1-2
Parking	Up to 2 per unit	Up to 1.5 per unit	Less than 1 per unit
spaces			

- 10.46 The maximum parking standards of the London Plan are set out above, although it is advised that all developments in areas with a good PTAL score should be aiming for significantly less than 1 space per unit. The site is located in an area with a poor PTAL score (1a) and therefore in applying the London Plan standards, it is considered the scheme should be providing parking at the upper level and a maximum of 11 parking spaces is identified as being appropriate.
- 10.47 Eleven surface car parking spaces are proposed on the site frontage which complies with the London Plan maximum standards. Furthermore, one of the parking spaces is designed for people with disabilities and the plans show Electric Vehicle charging in accordance with London Plan requirements 20% of the parking spaces have Electric Vehicle charging points with passive provision for future provision for a further 20%.
- 10.48 In relation to cycle parking, drawing number 4791/PA11 confirms that a total of 24 cycle parking spaces including 2 visitor spaces will be provided. This complies with London Plan requirements. It is recommended that further details in relation to the cycle storage (elevational treatment and security) be required by condition.
- 10.49 Having regard to trip generation, whilst the proposed redevelopment into flats may result in an increase in vehicular movements, given the limited additionality proposed in this proposal of two flats, the slight increase in residential vehicular movements will not have an unacceptable impact.

Access and Servicing

- 10.50 The site is currently served by one existing vehicle crossover towards the northern end of the site frontage. The current application proposes no changes to this existing arrangement. An automated gate is proposed which will be set back by 5m from the rear of the footway, which will allow for a car to wait off the highway while the gate is opening. A junction visibility assessment of the vehicle access shows 90m visibility in either direction which is acceptable.
- 10.51 In relation to pedestrian access, two separate pedestrian accesses are proposed. One of these would be stepped but the other along the northern boundary is step free and would provide pedestrian access for wheelchair users and buggies.
- 10.52 Storage for refuse and recycling is shown on the submitted plans. The storage would be located on the site frontage outside the vehicular access gate. Traffic and Transportation have advised that this is acceptable. It is recommended that elevational details be required by condition.

Climate Change - Sustainable Design and Construction

Biodiversity / Ecology

- 10.53 Policy 7.19 of the London Plan ("Biodiversity and access to nature") and Policy G6 of the London Plan (Intend to Publish) requires development proposals to make a positive contribution, where possible, to the protection, enhancement, creation and management of biodiversity. Core Policy 36 confirms that all developments should be seeking to protect, restore, and enhance sites while Policy DMD79 advises that on-site ecological enhancements should be made where a development proposes more than 100sqm of floor space, subject to viability and feasibility.
- 10.54 The proposal involves the demolition of an existing dwelling house. An ecological survey has been conducted whereby it has been concluded that the existing dwelling has a moderate potential for bats. As bats are a protected species by law a condition is recommended that prior to commencement of demolition works a method statement is submitted and approved by the Local Planning Authority in association with Natural England. If evidence of bat roosts are found a licence from the Statutory Nature Conservation Organisation for development works affecting bats must be obtained and a copy submitted to and approved in writing by the Council.
- 10.55 Consideration has also been given to the potential for the site to host other protected species. The submitted ecological report identifies that the site has low potential for reptiles and great crested newts and moderate potential for breeding birds and badgers. In order to ensure these species are protected it has been recommended that a precautionary approach to vegetation clearance be undertaken including that vegetation clearance be undertaken outside the bird nesting season (March- August inclusive). This can be secured by condition.

- 10.56 In terms of ecological enhancements, the submitted ecology report identifies that additional bird nesting and bat roosting provision could be incorporated into the design proposals these include the incorporation of bird boxes and bat boxes within the development. Bat roosting opportunities could be provided through tree mounted bat boxes and there are a range of bat boxes available which be selected to suit the development and bat species in the locality. Additionally, tree and shrub planting should be incorporated into the landscape proposals to compensate for any removal to facilitate the works. Planting will also include a high proportion of native species and be of local provenance where possible, carefully selected to ensure they contain species suitable for the area.
- 10.57 Having regard to the above, the proposed development will not detrimentally impact upon the existing ecological value of the site, and through measures proposed and to be secured by condition, will serve to enhance the value of the site in accordance with Policy 7.19 of the London Plan, CP36 of the Core Strategy and Policy DMD79 of the Development Management Document. This approach was previously accepted when granting planning permission for the redevelopment of this site.

Trees/ Landscaping

- 10.58 Policy DMD 80 requires the retention and protection of trees of amenity and biodiversity value on a site and in adjacent sites that may be affected by proposals while Policy DMD 81 ensures development must provide high quality landscaping that enhances the local environment.
- 10.59 There are no trees on the site which are protected by way of a Tree Preservation Order. However, there is a minor net loss of soft landscaping/green infrastructure at the front of the property. This landscaped frontage has been reduced from the scheme previously approved due to the need to provide two additional parking spaces and other additional servicing requirements as a result of providing two additional flats. However, the reduction is relatively minor, and the tree planting and landscaping arrangements have been improved since it was deferred by Planning Committee. The landscaping will include the planting of four new trees (previously 2) to replace the 4 that need to be removed to allow the development. Of those 4 trees to be provided, 3 will be located to the front of the property and one to the rear as per the existing positioning of the trees to be removed. There is also additional soft landscaping toward the front of the site and the existing boundary hedge will be retained. This will soften the appearance of the development when viewed from the front. On balance, this change has to be seen in the context of the development providing two new units and the total landscaped d setting for this development. As a result, this is considered acceptable. It is recommended that the species and specification of the new trees and additional soft landscaping be agreed by condition.

Energy

- 10.60 Policy DMD 51 sets out the Councils energy efficiency standards. All developments will be required to demonstrate how the proposal minimises energy-related CO2 emissions in accordance with the following energy hierarchy:
 - a. Maximising fabric energy efficiency and the benefits of passive design;
 - b. Utilising the potential for connection to an existing or proposed decentralised energy network in accordance with DMD 52 'Decentralised Energy Networks';
 - Demonstrating the feasibility and use of low or zero carbon technology in accordance with DMD 53 'Low and Zero Carbon Technology'; and, where applicable,
 - d. Financial contributions
- 10.61 Paragraph 148 states that the planning system should support the transition to a low carbon future in a changing climate and help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 10.62 An Energy Statement has been submitted with this application which demonstrates that an energy saving of 37.3% over part L of building regulations (2013) can be achieved in excess of the 35% reduction required by Council policy. The use of photovoltaic panels on the roof of the development will contribute towards exceeding the energy saving requirement. It is recommended that a condition be attached to ensure that the development is carried out in accordance with the recommendations of the report.

Sustainable Urban Drainage (SUDs)

- 10.63 London Plan policies 5.12 and 5.13 and Policy SI13 of the London Plan (Intend to Publish) require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 ("Managing flood risk through development") confirms the Council's approach to flood risk, inclusive of the requirement for SuDS in all developments while Policies DMD59 ("Avoiding and reducing flood risk") confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere. Furthermore, it states that planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to or result in unacceptable levels of flood risk on site or increase the level of flood risk to third parties. DMD61 ("Managing surface water") also requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.
- 10.64 It has been confirmed that the submitted strategy is acceptable in principle. It has been recommended that further details, including cross-sections of the proposed SUDs features, are required by condition.

10.65 In relation to the proposed basement, borehole logs were submitted which confirm that the development site is unlined with clay so the risk of groundwater flooding to the basement is low.

Water Efficiency

10.66 Policy DMD58 requires all residential developments to achieve as a minimum, water use of no more than 105 litres per person per day. A condition is recommended to secure this.

Site Waste Management

- 10.67 Policy 5.16 of the London Plan has stated goals of working towards managing the equivalent of 100% of London's waste within London by 2026, creating benefits from waste processing and zero biodegradable or recyclable waste to landfill by 2026. This will be achieved in part through exceeding recycling and reuse levels in construction, excavation and demolition ("CE&D") waste of 95% by 2020.
- 10.68 In order to achieve the above, London Plan policy 5.18 and Policy S17 of the London Plan (Intend to Publish) confirms that through the Local Plan, developers should be required to produce site waste management plans to arrange for the efficient handling of CE&D. Core Policy 22 of the Core Strategy states that the Council will encourage on-site reuse and recycling of CE&D waste.
- 10.69 Details of a construction waste management plan can be secured through an appropriately worded condition

11.0 **S106 Contributions**

- 11.1 The current proposal will result in a net gain of 10 residential units and therefore is liable to contribute towards affordable housing in line with adopted policy and the Council's S106 SPD. Following the deferral of the application from the meeting on 29th October, further discussions have taken place consideration to be given to the affordable housing offer proposed. A contribution of £320,000 was previously offered. Further viability analysis has revealed this equates to approximately 71% of that which would fully meet Council policy. The applicant has therefore agreed to increase the affordable housing contribution to £405,705 (i.e. £ 320,000 x 100/71) so that it meets the 20% requirement set out in policy.
- 11.2 This will be secured via a S106 Agreement.

12.0 Community Infrastructure Levy (CIL)

- 12.1 Both Enfield CIL and the Mayor of London CIL would be payable on this scheme to support the development of appropriate infrastructure.
- 12.2 Enfield falls within Mayoral Community Infrastructure Levy Band 2 and therefore qualifying development will be liable to pay £60/sqm. For Enfield, the site lies within the area liable for the higher rate residential CIL payment of £120/sqm in

accordance with the adopted Community Infrastructure Levy Charging Schedule (2016).

13.0 Conclusion

- 13.1 Planning decisions on applications must be made in accordance with the provisions of the "development plan" having regard to any other material considerations. In this case, significant weight must also be given to the scheme which previously received planning permission under ref: 18/04386/FUL
- 13.2 The reasons for recommending approval of this application are:
 - The proposed development will appear acceptable in the street scene and would be in keeping with recent planning permissions for similar developments in Cockfosters Road and the wider area;
 - Surrounding residents would not suffer an unreasonable loss of amenity as a consequence of the proposed development;
 - The proposal would contribute towards much needed housing within the borough, including additional family sized accommodation;
 - The proposal would provide adequate car parking, access and servicing provision;
 - The proposal presents an opportunity to enhance biodiversity;
 - The proposal would incorporate key sustainability initiatives in ecology, waste management, water, health and wellbeing, materials, pollution and surface water management in the design of the proposed development.
- 13.3 Having regard to the above assessment it is recommended that planning permission be granted subject to conditions and a S106 Agreement.







Mature Conifers



Driveway from Cockfosters Road

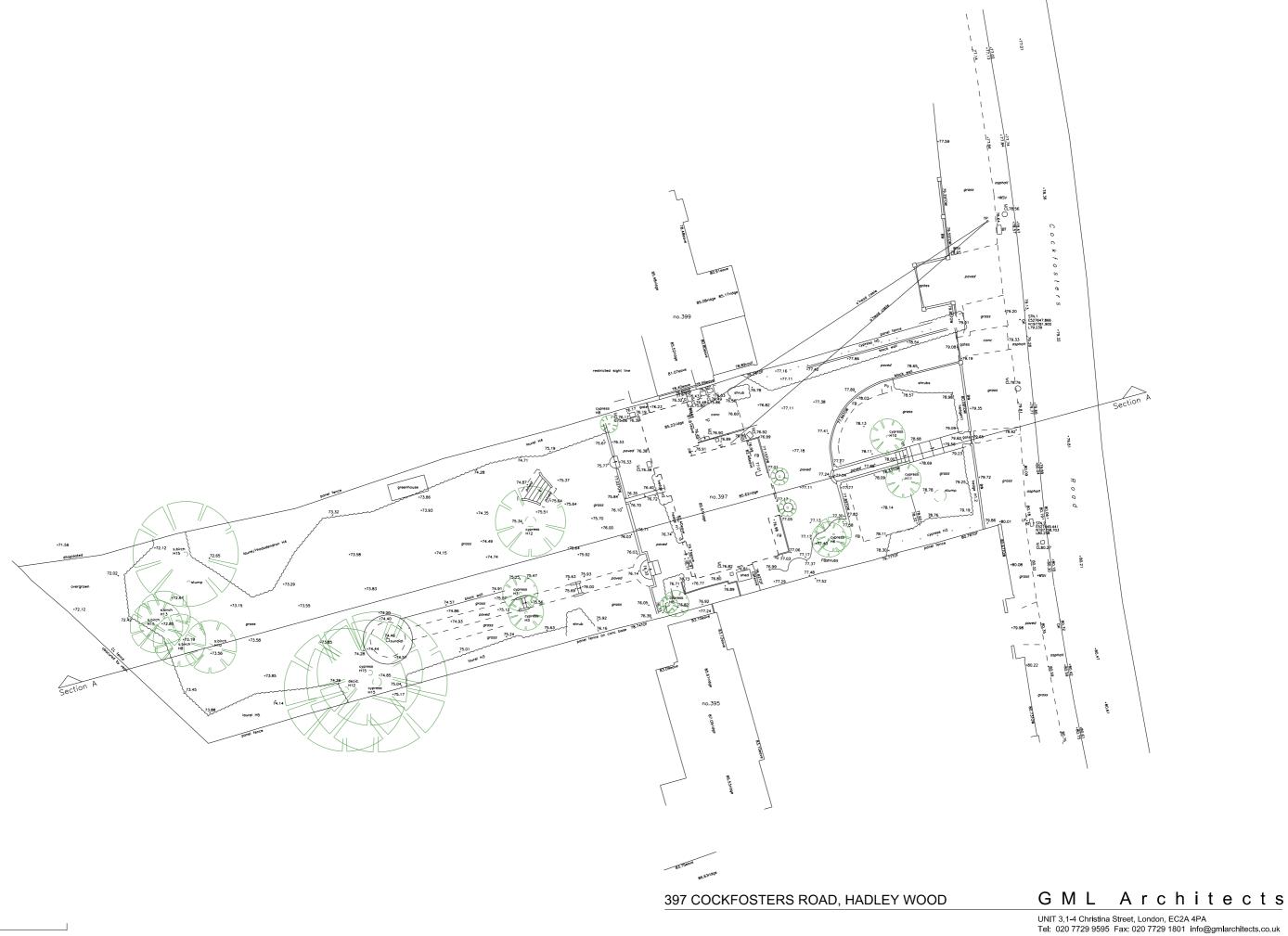


Rear Elevation



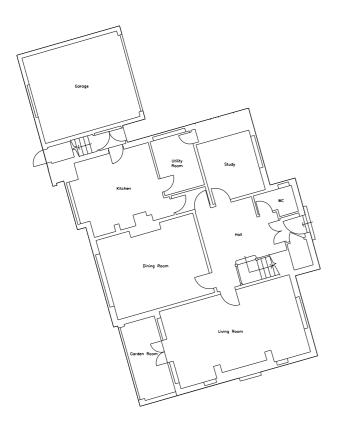
397 COCKFOSTERS ROAD, HADLEY WOOD

Site Photographs

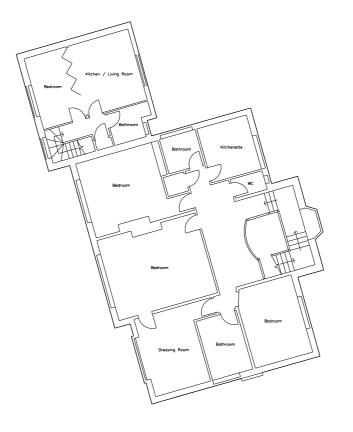


Site Survey Plans

UNIT 3,1-4 Christina Street, London, EC2A 4PA
Tel: 020 7729 9595 Fax: 020 7729 1801 info@gmlarchitects.co.uk
SCALE: 1:400@A3
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FIRST ISSUED: 27/04/2018 4791/PA03



Existing Ground Floor Plan



Existing First Floor Plan

397 COCKFOSTERS ROAD, HADLEY WOOD

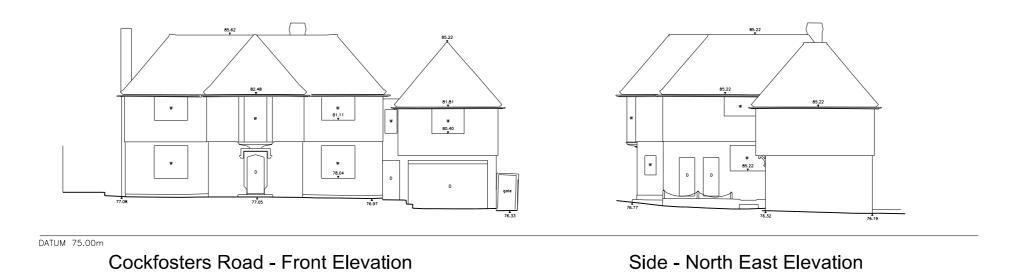
GML Architects

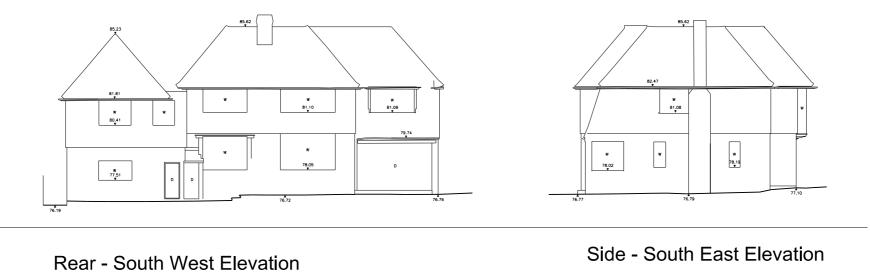
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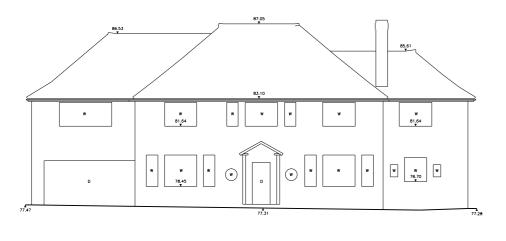
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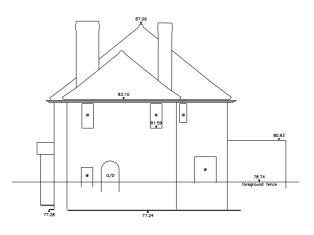


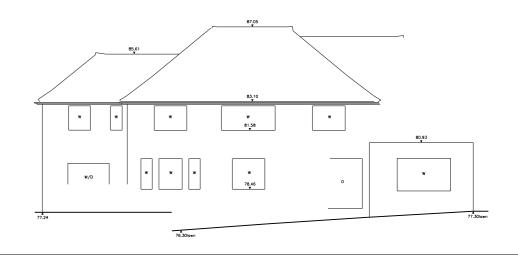


397 COCKFOSTERS ROAD, HADLEY WOOD

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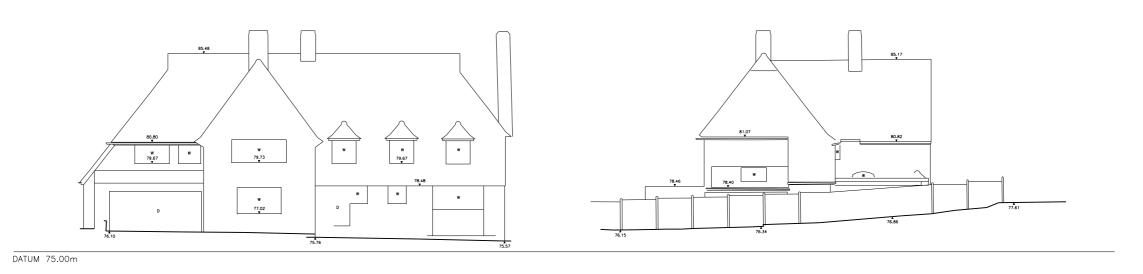






DATUM 75.00m

395 Cockfosters Road



399 Cockfosters Road

397 COCKFOSTERS ROAD, HADLEY WOOD

G M L A r c h i t e c t s

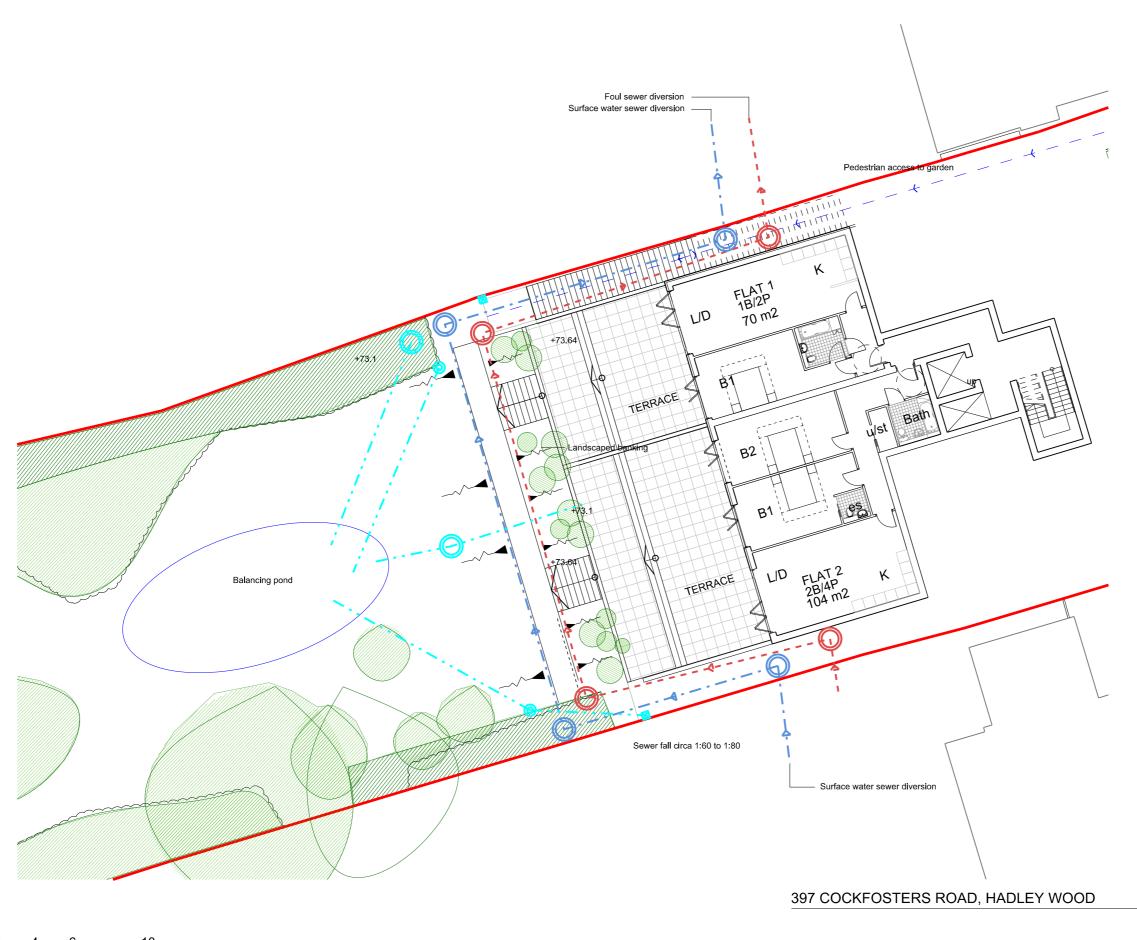
Adjoining Houses Existing Elevations UNIT 3,1-4 Christina Street, London, EC2A 4PA

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scale: 1:200@A3
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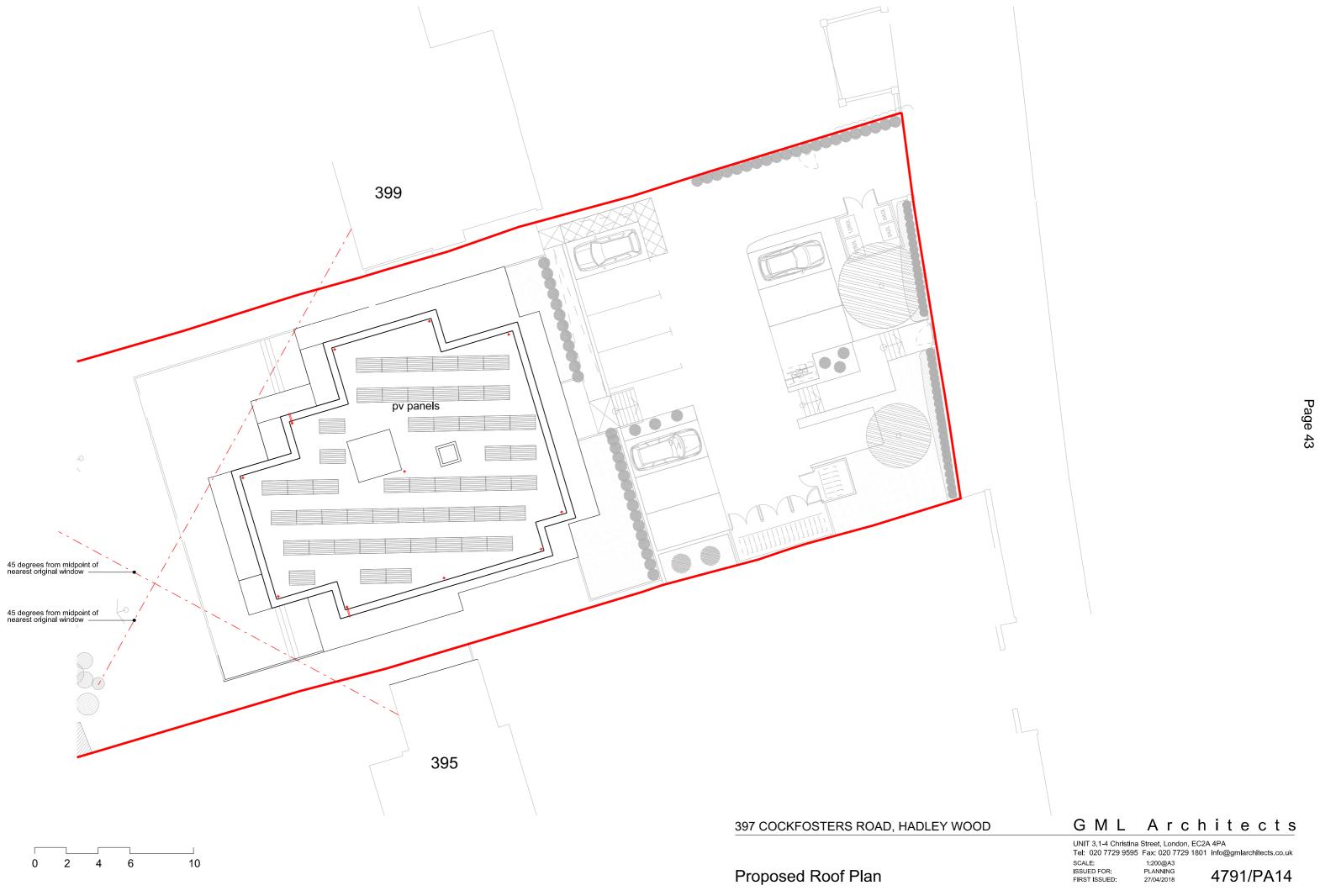
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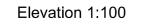
SCALE: ISSUED FOR: FIRST ISSUED: Proposed Lower Ground Floor Plan

1:200@A3 PLANNING 27/04/2018

4791/PA10

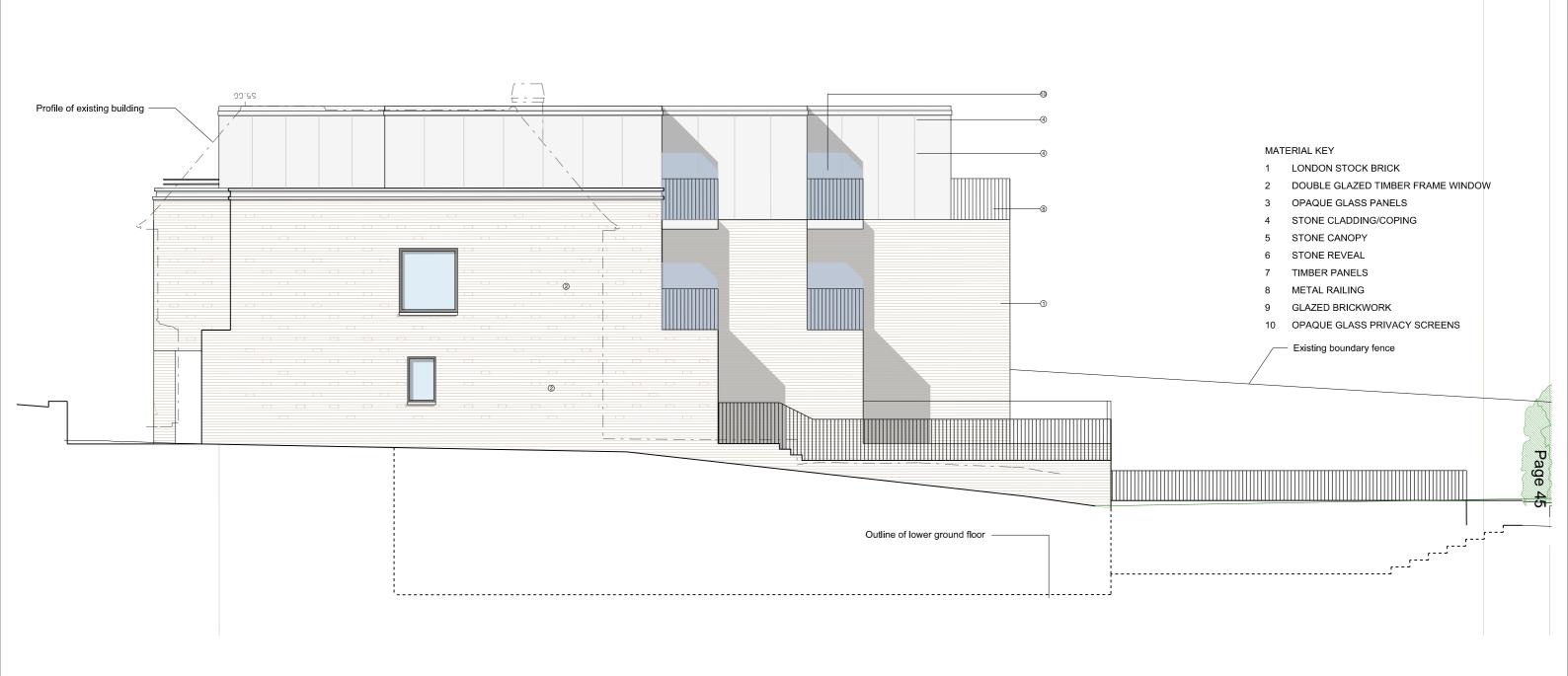






THE SITE

- 1 LONDON STOCK BRICK
- 2 DOUBLE GLAZED TIMBER FRAME WINDOW
- 3 OPAQUE GLASS PANELS
- 4 STONE CLADDING/COPING
- 5 STONE CANOPY
- 6 STONE REVEAL
- 7 TIMBER PANELS 8 METAL RAILING



397 COCKFOSTERS ROAD, HADLEY WOOD

Proposed Side Elevation (North)

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4791/PA21



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Proposed Rear Elevation (South)

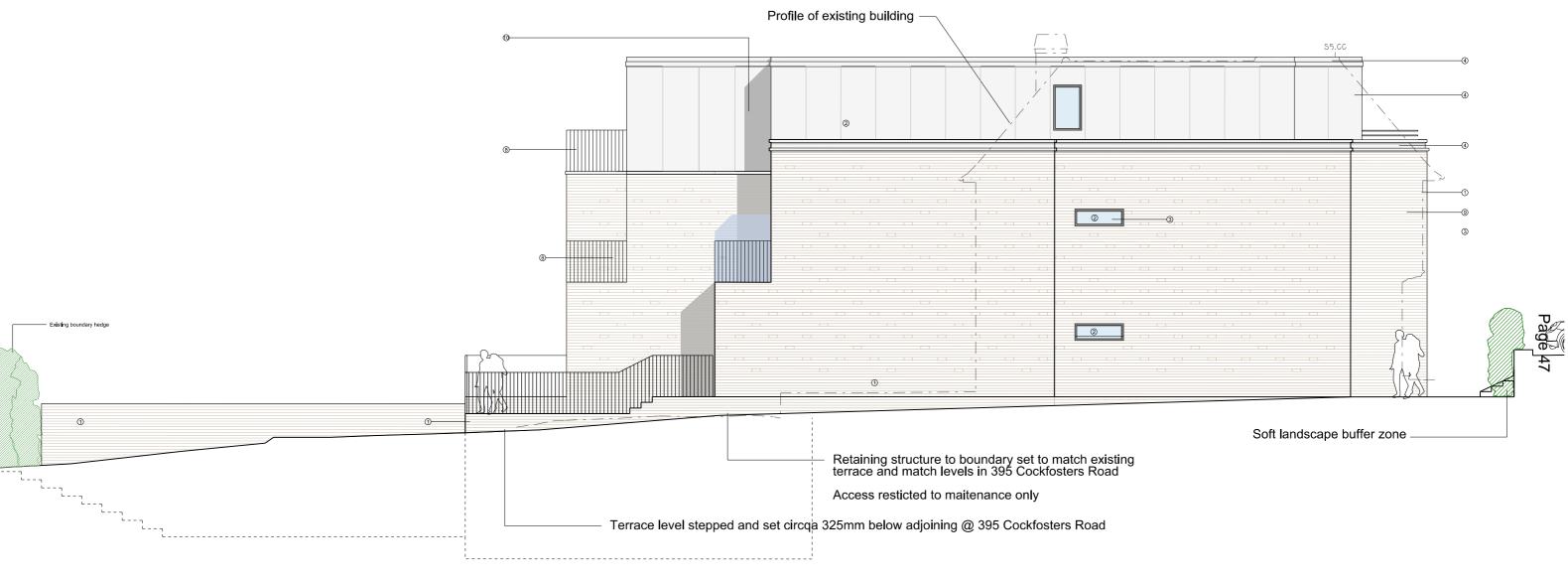
0 1 2 3 5

SCALE: 1:100@A3
ISSUED FOR: PLANNING
FIRST ISSUED: 27/04/2018

4791/PA22

MATERIAL KEY

- 1 LONDON STOCK BRICK
- 2 DOUBLE GLAZED TIMBER FRAME WINDOW
- 3 OPAQUE GLASS PANELS
- 4 STONE CLADDING/COPING
- 5 STONE CANOPY
- 6 STONE REVEAL
- 7 TIMBER PANELS
- METAL RAILING
- GLAZED BRICKWORK
- OPAQUE GLAZED PRIVACY SCREEN





397 COCKFOSTERS ROAD, HADLEY WOOD

Proposed Detail Front Elevation

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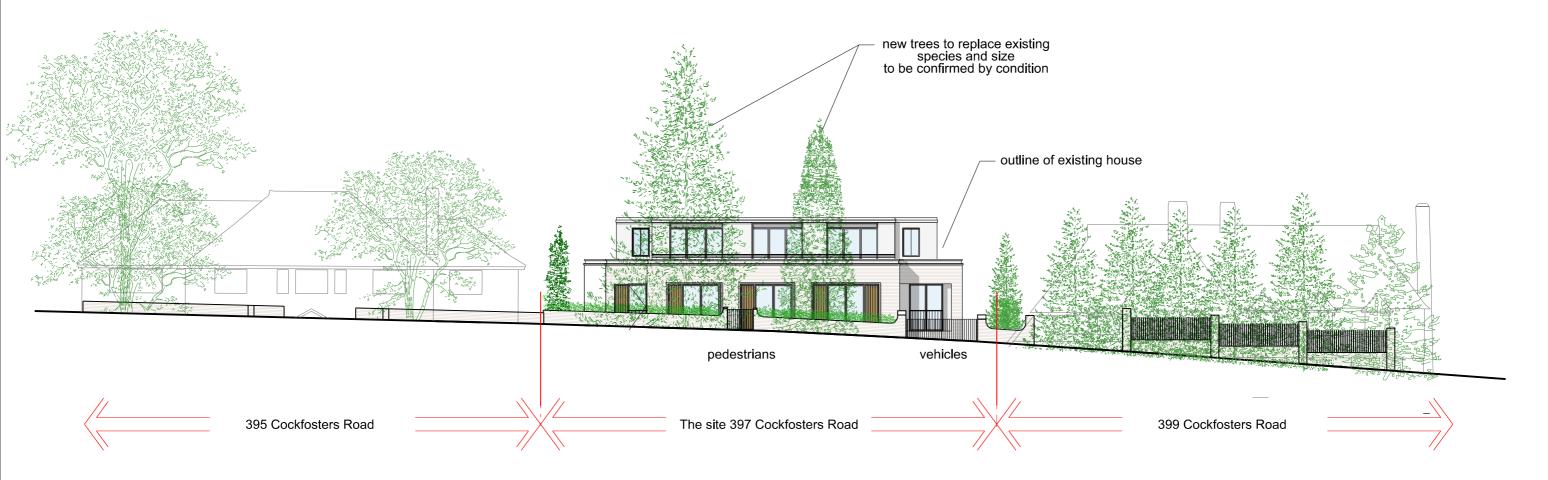
4791/PA24



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SCALE: ISSUED FOR: FIRST ISSUED: 1:50@A3 PLANNING 27/04/2018

4791/PA25



PRECEDENT



PRECEDENT



397 COCKFOSTERS ROAD, HADLEY WOOD

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SCALE: 1:200@A3
ISSUED FOR: PLANNING
FIRST ISSUED: 27/04/2018 4791/PA40

LONDON BOROUGH OF ENFIELD				
PLANNING COMMITTEE		Date: 24 November 2020		
Report of:	Contact Offic	er:		Ward:
Head of Planning	Alex Johnson		Winchmore Hill	
Application Number: 20/02299/RE4			Category: Major	
LOCATION: Winchmore School, Laburnum Grove, London, N21 3HS				
PROPOSAL: Replacement of existing roof and windows to the main building.				
Mr Allen GibbonsMr JarSchools Capital Delivery TeamStace		'3 High Street		

RECOMMENDATION:

EN1 3XA

That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, planning permission be deemed to be GRANTED subject to conditions.

Ref: 20/02299/RE4 LOCATION: Winchmore School, Laburnum Grove, London, N21 3HS HIGHFIE D ROAD NOW MINION El Sub Sta LA BURNUN GARDENS Winchmore School Reproduced by permission of Ordnance Survey on behalf of HMSO. ©Crown Copyright and database right 2013. All Rights Reserved. Ordnance Survey License number 100019820 Scale 1:1250 North

1. Note to Members

1.1 The applicant for this planning application is the Council in addition to which, the proposal is catagorised as a "major" development. In accordance with the scheme of delegation therefore, this application is reported to Planning Committee for determination

2. Recommendation

- 2.1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, planning permission be deemed to be GRANTED subject to conditions.:
 - 1. Time Limited Permission
 - 2. Development to be carried out in accordance with approved plans and documents.

3. Executive Summary

- 3.1 The application seeks approval for the replacement of the existing roof and windows of the north wing school building.
- 3.2 The reasons for recommending approval are:
 - i) The proposed development would be consistent with the objectives of national, regional and local planning policy in terms of providing improvements to existing education infrastructure.
 - ii) The proposed building would not detract form the visual amenities of the area.
 - iii) The development would not adversely affect residential amenity or lead to conditions prejudicial to the free flow and safety of traffic on the adjoining highways

4. Site and Surroundings

- 4.1 The site, measuring 5.9ha, comprises an existing school complex comprising of a number of buildings up to three storeys in height. The site also comprises existing soft and hard landscaping, car and cycle parking areas, playgrounds and sports pitches.
- 4.2 The proposal relates to the north wing of the main block located at the front of the site facing Laburnum Grove which comprises a 2-storey concrete frame building constructed dating from the 1950's and providing classroom and administration facilities. The existing windows are single glazed metal crittall fenestration with a masonry panel set at the bottom of the frame while the front entrance comprises full height single glazed metal crittall windows set within a timber sub frame. The main roof comprises a shallow pitch green coloured, metal sheeted, standing seam roof laid to a concrete deck. A felted flat roof is located in the centre well of the main roof and a felted felt flat roof is provided to the front entrance porch.

- 4.3 The area of green space to the south of the school site is designated as Local Open Space and Metropolitan Open Land. The site does not contain any listed buildings and does not lie within a Conservation Area. The site falls within Flood Zone 1 (low risk).
- 4.4 The immediate surrounding area is largely characterised by residential and properties in a variety of different architectural styles.



Image 1 Photo of Existing Roof



Image 2 Existing Elevation of North Wing

5. Proposal

- 5.1 Permission is sought for the construction of a replacement roof to serve the north wing school building, together with replacement windows.
- 5.2 The existing metal windows would be replaced with powder aluminium curtain walling. The existing metal standing seam roof would be replaced with a new insulated powder coated metal standing seam roof.

6. Relevant Planning History

6.1 20/01169/RE4 - Construction of a new stand alone two storey sixth form block with associated external landscaping works and formation of a new MUGA – Members resolved to grant planning permission subject to conditions at the 1st September 2020 Planning Committee.

7. Consultation

Public:

- 7.1 Consultation letters were sent to 25 neighbouring properties. A press advert was placed in the local newspaper and a site notice was placed near the application site.
- 7.2 One objection has been received relating to the following points:
 - Affect local ecology
 - General dislike of proposal
 - Inadequate parking provision

- Increase of pollution
- Loss of light
- Loss of privacy
- Noise nuisance

7.3 The Officer response to objection set out below:

- There is often an element of disruption during any construction works. Good site management should reduce any unreasonable nuisance and there is other legislation to protect those working and residing next to construction sites.
- The application seeks to replace existing windows and the roof of the building. Due to the nature of the proposal the scheme would not impact on local ecology, pollution, parking provision or loss of light.

8. Relevant Policies

8.1 <u>London Plan (2016)</u>

Policy 3.18 – Education Facilities

Policy 5.3 - Sustainable design and construction

Policy 7.4 - Local character

Policy 7.6 - Architecture

8.2 Intend to Publish London Plan

The Examination in Public of the draft London Plan took place in the Spring of 2019. The Panel of Inspectors' report and recommendations to the Mayor was issued in October 2019. The Mayor subsequently issued his Intend to Publish London Plan in December 2019.

In March 2020, the Secretary of State issued Directions to change a number of policies. Whilst the London Plan 2016 is still the adopted Development Plan for Enfield, the advanced stage that the Intend to Publish version has reached means that it is a material consideration in the determination of planning applications and will continue to gain more weight through the final stages of the examination process. The relevant, unchallenged policies of the Intend to Publish London Plan are as follows:

Policy GG2 - Making the Best Use of Land

Policy D1 — London's Form, Character and Capacity for Growth

Policy D4 – Delivering Good Design

Policy D5 – Inclusive Design

Policy S1 — Developing London's Social Infrastructure

8.3 <u>Core Strategy (2010)</u>

Policy CP8 - Education

Policy CP30 - Maintaining and Improving the Quality of the Built and Open

Environment

8.4 <u>Development Management Document (2014)</u>

Policy DMD10 - Distancing

Policy DMD37 - Achieving High Quality and Design-Led Development Policy DMD38 - Design Process

8.5 Other Material Considerations

- National Planning Policy Framework (NPPF) 2019 (revised)
- National Planning Practice Guidance (PPG)
- National Design Guide
- Enfield Characterisation Study

9. Analysis

- 9.1 The main issues arising from this proposal for Members to consider are:
 - 1. Principle;
 - 2. Design
 - 3. Impact upon Neighbouring Amenity

Principle of Development

- 9.2 The proposal is seeking to provide a new replacement roof and windows to serve the north wing building of Winchmore School.
- 9.3 The NPPF outlines within Paragraph 94 of the need to deliver school places on a national scale 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'. The London plan goes on to advise within Policy 3.18 'Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes', consistent with the objectives of Policy S1 of the Intend to Publish London Plan.
- 9.4 At a local plan level, the Council provides guidance within policy CP8 of the Enfield Core Strategy and states 'The Council will contribute to improving the health, lives and prospects of children and young people by supporting and encouraging provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. Facilities will also be provided for further and adult education to develop and improve the skills of the existing and future workforce'.
- 9.5 The proposal has been submitted to provide long needed improvements to the north wing of the existing school in terms of improving appearance, improving long term maintenance and improving energy efficiency, in the interests of providing better quality educational space. The supporting planning statement has also advised that the existing roof is in a poor state of condition and has been subject to numerous water leaks.
- 9.6 The provision of improved educational infrastructure is welcomed and consider the delivery of the works sought within this application to be compatible with the NPPF, London Plan Policy 3.18, Intend to Publish London Plan Policy S1, Core Strategy Policy CP8 and Development Management Document policy DMD16.

Design and Appearance

- 9.8 In terms of design, Core Strategy Policy 30 requires all developments to be high quality and design led, having special regard to their context. Meanwhile Policy DMD 37 seeks to achieve high quality design and requires development to be suitable designed for its intended function that is appropriate to its context and surroundings. The policy also notes that development should capitalise on opportunities to improve an area and sets out urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability, and diversity.
- 9.9 In addition, London Plan Policy 7.4 advises development should have regard to local character and states in its overall strategic aim that 'development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings'. Furthermore, Policy 7.5 of the London Plan outlines a similar aim and seeks for proposals in public places to be 'Secure...easy to understand and maintain, relate to local context, and incorporate the highest quality design' while Policy 7.6 of the London Plan sets out regional requirements in regards to architecture and states that development should 'incorporate the highest quality materials and design appropriate to its context'. The policy goes on to state that buildings and structures should 'comprise details and materials that complement...the local architectural character.'
- 9.10 The existing school comprises of a number of buildings with associated parking and landscaping. The existing buildings vary in height up to three storeys and vary in style though a feature is the regimented windows pattern and elevations broken up with defined blocks.
- 9.11 The proposal is seeking to replace the existing fenestration of metal windows with powder aluminium curtain walling. The curtain walling will enclose the existing exposed concrete columns thereby removing the current cold bridging issue. The pattern of the curtain walling will largely reflect the current fenestration pattern. The proposed windows are stated as being finished in an anthracite grey (RAL Colour 7016) with the proposed curtain walling in a goosewing grey.
- 9.12 It is considered the proposed replacement windows are acceptable and that the new windows would be in keeping with the main building as well as the established character of the Winchmore School complex as a whole. Furthermore, it is considered that the proposals utilise acceptable colours that integrate with the main building. In summary these elements are considered acceptable from a design perspective.
- 9.13 The proposal is also seeking to replace the existing roof serving the north wing. The proposal seeks to replace the existing metal standing seam roof with a new insulated powder coated metal standing seam roof with no alterations to the pitch. The proposal also seeks to remove the rooflights in the existing roof to save on maintenance costs. The existing roof is finished in a green colour and is proposed to be replaced with a goosewing grey colour which is considered to be more complimentary than the existing roof, which is also noted to be in a poor state of condition.

9.14 This element of the proposals is also considered to be acceptable.

Metropolitan Open Land

9.15 In terms of the relationship to the metropolitan open land (MOL) sited to the south of the application site, it is noted that the proposed works fall on the north wing building. This means that the proposed works are significantly shielded from the MOL. Furthermore, it is noted that the works do not propose any additional bulk or massing to the existing north wing building which would therefore not compromise the setting and openness of the MOL. The proposal is therefore acceptable in this regard.

Impact on Neighbouring Amenity

- 9.16 London Plan Policy 7.6 states that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Policies DMD 6 and 8 ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment and the principles contained in this policy have been applied in this case given the relationship to residential properties. Furthermore, Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. The Intend to Publish London Plan outlines in policies D1 and D3 of the importance of ensuring buildings are well designed to ensure against prejudicing neighbouring amenity.
- 9.17 The site is located within a residential area with residential properties to the north, east and west with designated open space to the south. The properties considered to be impacted mostly by the proposed development are located on Laburnum Gardens to the north-east, Laburnum Grove to the north, Carpenter Gardens and Reardon Court to the immediate west of the application site and Highfield Road to the north of the site.
- 9.18 Given the nature of the proposed works which do not propose any additional massing or bulk but simply seeks to replace existing windows and doors and install a replacement roof, it is considered that neighbouring residential properties on Carpenter Gardens, Highfield Road and Laburnum Grove given their positioning and orientation in relation to the proposed development would not be adversely affected through a loss of privacy, loss of light or outlook impacts.
- 9.19 It is acknowledged that there would be noise impacts upon properties in the locality during construction phases of the development, however these would be temporary in nature and do not present grounds to resist this proposed development.

Climate Change - Environmental Sustainability

9.20 All new development must achieve the highest sustainable design and construction standards and include measures capable of mitigating and adapting to climate change to meet future needs having regard to technical feasibility and economic viability. The proposed replacement roof and windows would help reduce carbon emissions from the building which would

be in accordance with adopted climate change planning policies commensurate with the nature of the proposed development.

13. Conclusion

- 13.1 The proposed development is welcomed, and the application has been considered with regard to the National Planning Policy Framework (NPPF) and its presumption in favour of sustainable development.
- 13.2 The proposals would result in improvements to the existing north wing building at Winchmore School which would provide improvements to the existing roof in preventing water leaks as well as improving energy efficiency. The proposed window replacements are considered to be of an acceptable appearance, colour and relationship to the main building.
- 13.3 This report shows that the benefits of the proposed development have been given due consideration. In this respect the benefits are summarised again as follows:
 - The development provides much needed improvements to existing educational infrastructure.
 - The proposed replacement windows and roof are considered acceptable from a design perspective and would not harm the setting and openness of MOL to the south of the application site.
 - The proposed development by reason of the nature of the works sought would not unacceptably impact on neighbouring amenity or the highway network.
- 13.4 It is therefore considered the proposed development is acceptable when assessed against the suite of relevant planning policies.







Existing elevation



Existing standing seam pitched roof (light green)

Existing pitched standing seam pitched roof (light green).



Front entrance glazing -Single glazed windows in metal framing, set in a timber sub-frame

> Powder coated double glazing aluminum windows and doors forming an entrance porch

Exposed painted concrete frame

Existing single glazed metal crittall bottom hung casement windows.



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For Informaiton



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Client

Enfield Borough Council

Project

Winchmore School

North Block

Drawing Title

Existing Front Elevation

Scale	Sheet Size
1:200	A3
Date	Drawn by
21/05/2020	JTL
Drawing No.	l Rev

2020/0888/P05







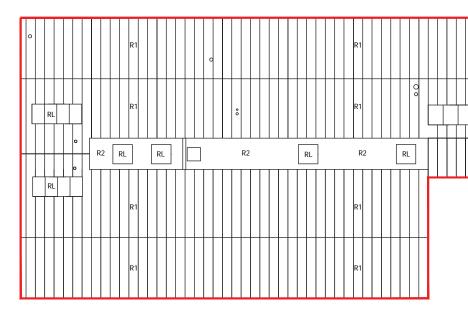


Existing R2



R3

Underside of R3



RL = Rooflights

Roof 1 - Pitched metal standing seam

Roof 2 - Flat felted

RL

15m

Scale Bar @ 1:200

Roof 3 - Flat felted



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Planning

Enfield Borough Council

Project

Winchmore School

North Block

Re-roof and Recladding

Drawing Title

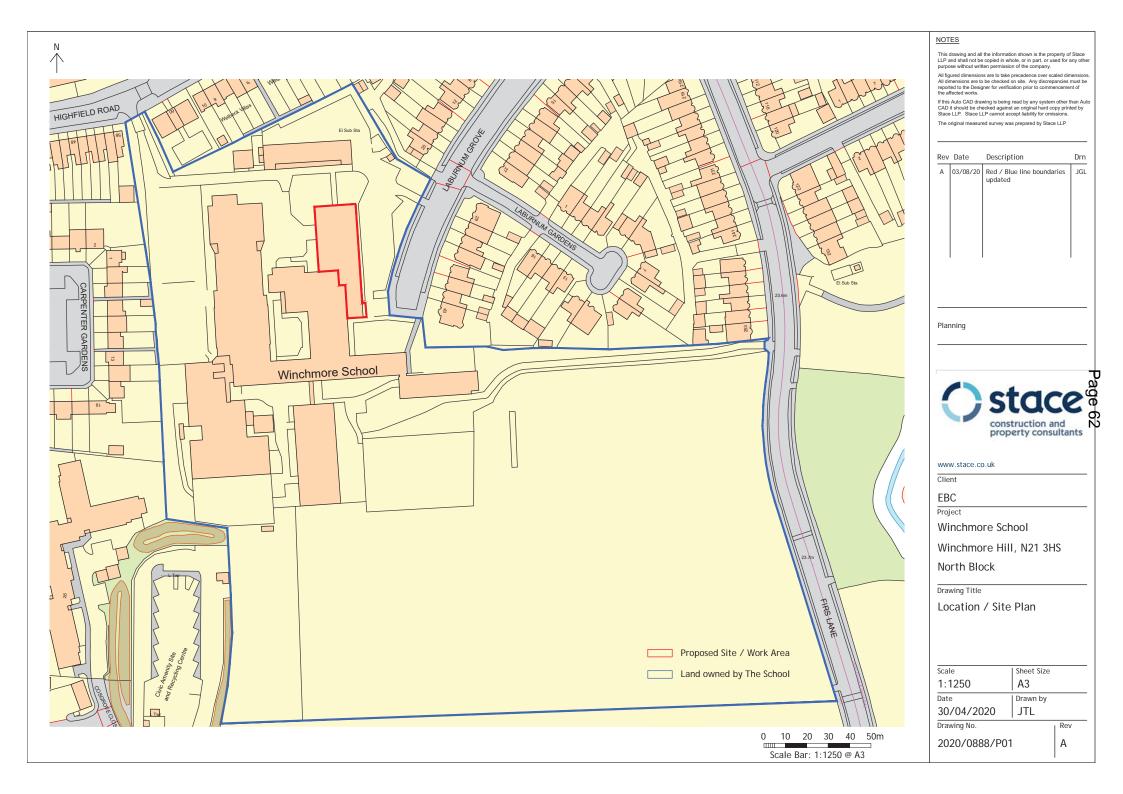
Roof Plan

Existing

Scale	Sheet Size
1:200	A3
Date	Drawn by
21/05/2020	JTL / JGL
Drawing No.	, Rev

Drawing No.

2020/0888/P02





Roof - Kinspan standing seam KS 500 / 1000 ZIP IP Curtain Walling - Kawneer

Proposed colours:

Roof - Goosewing Grey

Curtain Walling - Vertical Columns - Goosewing Grey

- Windows and framing Anthracite Grey (RAL 7016)
- Panels White



Scale Bar @ 1:200

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Enfield Borough Council

Project

Winchmore School

North Block

Drawing Title

Front Elevations & Roof

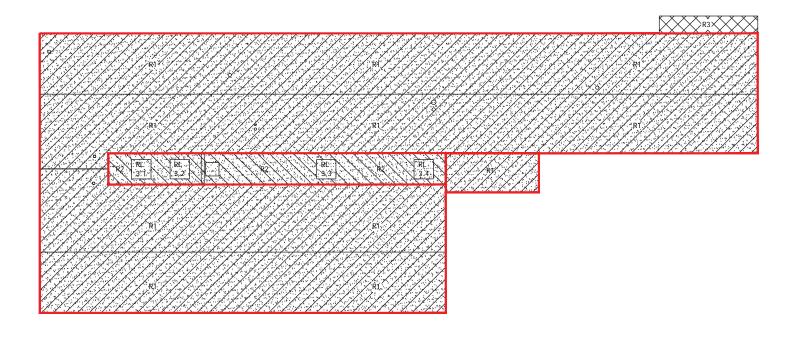
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Date	Drawn by
11/05/2020	JTL / JGL
Drawing No.	, Rev

Drawing No.

20/0888/P06





R1 - New Kingspan standing seam Insulated Panel Roof - KS 500 / 1000 ZIP IP (Goosewing Grey)

R2 - New Langley Paracoat Polyurea roofing system laid to insulation to fall

R3 - New Langley Paracoat polyurea roofing system laid to existing deck

RL - Rooflights



0 5 10 15m Scale Bar @ 1:200

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Client

Enfield Borough Council

Project

Winchmore School

North Block

Re-roof and Recladding

Drawing Title

Roof Plan

Proposed

Scale	Sheet Size
1:200	A3
Date	Drawn by
21/05/2020	JTL / JGL

Drawing No.

Rev

2020/0888/P03

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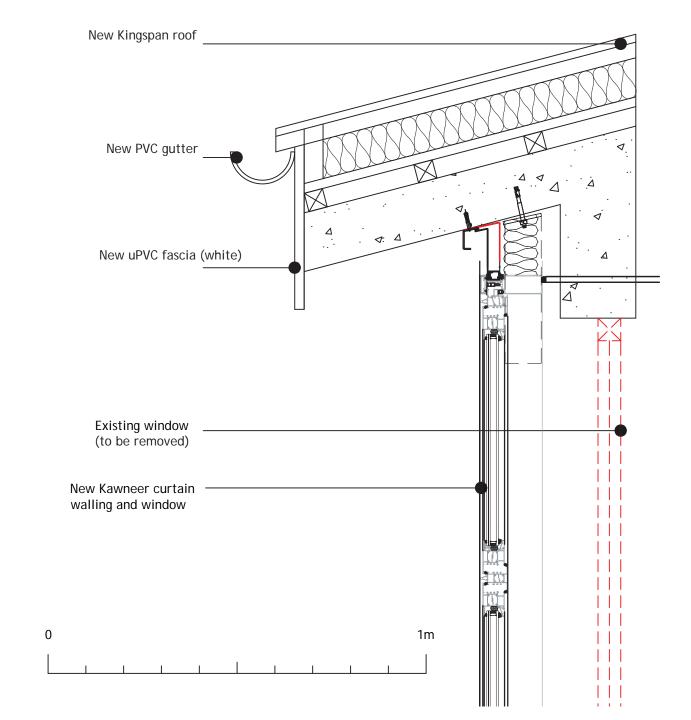
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	Data		_
Rev	Date	Description	Drn

EBC
Project Name
Winchmore Schoo
North Block

Client

	R1
ı	Roof & Curtain
	Walling Section

Drawing Title

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Rev



LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE Date: 24th November 2020

Report of:Contact Officer:Ward: SouthgateHead of PlanningAndy HighamGreen

Allison De Marco

Evie Learman Tel: 0208 132 0873

Application Number: 20/01049/FUL and **Category:** Major

associated Listed Building consent 20/01188/LBC

LOCATION: Car Park Adjacent to Arnos Grove Station, Bowes Road, London, N11 1AN

PROPOSAL:

20/01188/LBC

Alterations to curtilage listed walls to Grade II* Listed Amos Grove Underground Station involving partial demolition and rebuilding, retention and refurbishment of four existing listed lampposts two of which are relocated to accommodate a new public square.

20/01049/FUL

Erection of 4No buildings between one to seven storeys above ground level, with some elements at lower ground floor level comprising 162 residential units (Class C3) and flexible use ground floor unit (Class A1/A3/A4) together with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works.

Applicant Name & Address:

Connected Living London (Arnos Grove)

Ltd

Citygate

St James' Boulevard Newcastle Upon Tyne

NE1 4JE

Agent Name & Address:

Susie Byrne

Quod

7 Ingeni Building

Broadwick Street

London

W1F 0DE

RECOMMENDATION:

That subject to the completion of a S106 to secure the matters covered in this report, the Head of Planning or the Head of Development Management be authorised to GRANT planning permission and Listed Building consent subject to conditions.

Ref: 20/01049/FUL LOCATION: Car Park Adjacent To Arnos Grove Station, Bowes Road, London, N11 1AN Reproduced by permission of Ordnance Survey on behalf of HMSO. ©Crown Copyright and Scale 1:2500 North database right 2013. All Rights Reserved.
Ordnance Survey License number 100019820 ENFIELD Council

Drawing's / Application Documents:

Air Quality Assessment March 2020

Noise and Vibration Assessment Report March 2020

Sustainability Statement March 2020

Construction Resource Management Plan March 2020

Energy Statement March 2020

Ecological Technical Note March 2020

Biodiversity Net Gain Assessment March 2020

Arboricultural Impact Assessment March 2020

Fire Statement March 2020

MLUK-721-A-P-XX-1010 Proposed Site Plan rev 01: revised September 2020

MLUK-721-A-P-XX-1030 Proposed Site Elevations & Sections

MLUK-721-A-P-XX-1031 Proposed Site Elevations & Sections rev 01: revised September 2020

MLUK-721-A-P-XX-1032 Proposed Site Elevations & Sections

MLUK-721-A-P-A0-1200 Public Square - Level 00 Proposed GA Plan

MLUK-721-A-P-A1-1210 Bldg A01 - Level 00 Proposed GA Plan

MLUK-721-A-P-A1-1211 Bldg A01 - Level 01 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-A1-1212 Bldg A01 - Level 02 Proposed GA Plan

MLUK-721-A-P-A1-1213 Bldg A01 - Level 03 Proposed GA Plan

MLUK-721-A-P-A1-1214 Bldg A01 - Level 04 Proposed GA Plan

MLUK-721-A-P-A1-1215 Bldg A01 - Level 05 Proposed GA Plan

MLUK-721-A-P-A2-1219 Bldg A02 - Level B1 Proposed GA Plan

MLUK-721-A-P-A2-1220 Bldg A02 - Level 00 Proposed GA Plan

MLUK-721-A-P-A2-1221 Bldg A02 - Level 01 Proposed GA Plan

MLUK-721-A-P-A2-1222 Bldg A02 - Level 02 Proposed GA Plan

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MLUK-721-A-P-A2-1225 Bldg A02 - Level 05 Proposed GA Plan

MLUK-721-A-P-A2-1226 Bldg A02 - Level 06 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-A2-1227 Bldg A02 - Level 07 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-B1-1230 Bldg B01 - Level 00 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-B1-1231 Bldg B01 - Level 01 Proposed GA Plan

MLUK-721-A-P-B1-1232 Bldg B01 - Level 02 Proposed GA Plan

MLUK-721-A-P-B1-1233 Bldg B01 - Level 03 Proposed GA Plan

MLUK-721-A-P-B2-1239 Bldg B02 - Level B1 Proposed GA Plan

MLUK-721-A-P-B2-1240 Bldg B02 - Level 00 Proposed GA Plan

MLUK-721-A-P-B2-1241 Bldg B02 - Level 01 Proposed GA Plan

MLUK-721-A-P-B2-1242 Bldg B02 - Level 02 Proposed GA Plan

MLUK-721-A-P-B2-1243 Bldg B02 - Level 03 Proposed GA Plan MLUK-721-A-P-B2-1244 Bldg B02 - Level 04 Proposed GA Plan

MLUK-721-A-P-A2-1245 Bldg B02 - Level 05 Proposed GA Plan

MLUK-721-A-P-A2-1246 Bldg B02 - Level 06 Proposed GA Plan

MLUK-721-A-P-XX-2100 Bldg A01 & A02 Sections

MLUK-721-A-P-XX-2101 Bldg B01 Sections

MLUK-721-A-P-XX-2102 Bldg B02 Sections

MLUK-721-A-P-A0-3100 Public Square Elevation - South

MLUK-721-A-P-A0-3101 Public Square Elevation - East

MLUK-721-A-P-A1-3110 Bldg A01 Elevation - South

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MLUK-721-A-P-A1-3111 Bldg A01 Elevation - West
MLUK-721-A-P-A1-3112 Bldg A01 Elevation - North
MLUK-721-A-P-A1-3113 Bldg A01 Elevation - East rev 01: revised September 2020
MLUK-721-A-P-A2-3120 Bldg A02 Elevation - South
MLUK-721-A-P-A2-3121 Bldg A02 Elevation - West
MLUK-721-A-P-A2-3122 Bldg A02 Elevation - North
MLUK-721-A-P-A2-3123 Bldg A02 Elevation - East rev 01: revised September 2020
MLUK-721-A-P-B1-3130 Bldg B01 Elevation - South
MLUK-721-A-P-B1-3131 Bldg B01 Elevation - West
MLUK-721-A-P-B1-3132 Bldg B01 Elevation - North
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MLUK-721-A-P-B2-3141 Bldg B02 Elevation - West
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MLUK-721-A-P-XX-3200 Bay Study - Typical Projecting Balcony
MLUK-721-A-P-XX-3201 Bay Study - Typical Inset Balcony
MLUK-721-A-P-XX-3202 Bay Study - Deck Access Balcony
MLUK-721-A-P-XX-3203 Bay Study - Bldg A01 Cafe
MLUK-721-A-P-XX-3250 Bay Detail - Typical Window
MLUK-721-A-P-XX-3251 Bay Detail – Typical Balcony
MLUK-721-A-P-XX-3252 Bay Detail - Bldg B01
MLUK-721-A-P-XX-3253 Bay Detail - Bldg B01
MLUK-721-A-P-XX-3254 Bay Detail - Bldg B02
MLUK-721-A-P-XX-3255 Bay Detail - Bldg A01 Café
537-CTF-XX-00-DR-L-1000 Landscape General Arrangement Plan rev 01: revised
September 2020
537-CTF-XX-00-DR-L-1002 Landscape General Arrangement Plan - Bus
Interchange
537-CTF-XX-07-DR-L-1001 Green Roofs Plan
537-CTF-01-ZZ-DR-L-2000 Plot A Landscape Sections
537-CTF-01-ZZ-DR-L-2001 Plot A Landscape Sections
537-CTF-02-ZZ-DR-L-2002 Plot B Landscape Sections
537-CTF-XX-ZZ-DR-L-5000 Planting Plan
537-CTF-XX-XX-DR-L-7000 Tree Removal Plan
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1.0 EXECUTIVE SUMMARY

- 1.1 The application proposes a high quality residential led development on existing Brownfield land in a highly sustainable location. The Development will make a significant contribution towards the Borough's and wider London housing needs and will help Enfield to meet its growing population. Developing on Brownfield land also protects the Borough's greenfield and greenbelt land thus preserving this important characteristic of Enfield.
- 1.2 The benefits of delivering housing on an underutilised brownfield site in a highly accessible location (directly adjacent to a tube station), partially within and directly adjacent to a designated local centre (Arnos Grove Local Centre) has strong planning policy support and should be afforded substantial weight in the determination of the application. The site is situated directly adjacent to a tube station and bus interchange providing a robust case for a car-free development.
- 1.3 The Development will deliver 40% Affordable Housing (by habitable room), comprising 64 new high-quality affordable homes. The proposal is a Build-to-

- Rent scheme, providing on-site management and concierge as well as a residents' lounge and gym and high-quality public realm and amenity areas.
- 1.4 Housing need continues to rise in the Borough and the actual delivery of homes to meet the needs of residents has not kept a pace. Over the last 5-years, approximately 550 new residential units per year have been delivered significantly below the 798 units that are required by the adopted London Plan. Housing delivery continues to be a priority as well as a challenge.
- 1.5 The proposal to introduce residential use to this under-utilised site responds positively to London Plan and the Mayor's Intend to Publish London Plan policies to increase housing supply and optimise sites and is supported. The site has an excellent PTAL of 4 6a (6a being excellent), is adjacent to an underground station and a bus interchange. As such, this site is an optimal location for residential development and the proposed 162 new residential units are strongly supported in principle. The introduction of a small flexible commercial space or residential amenity space is supported in strategic terms.
- 1.6 The redevelopment of car parks and public sector owned sites for housing is supported by the London Plan (Intend to Publish). As such the Proposed Development aligns with emerging policy and can contribute towards the Borough's predicted housing needs. The site is identified as an 'opportunity site' within Enfield's adopted development plan (North Circular Area Action Plan at NC Policy 2: Opportunity Site 7). NC Policy 17 also sets out that the site has potential to be released for redevelopment. The principle of development is supported at this location (detailed assessment below).
- 1.7 The Development provides for new employment opportunities (at construction stage and post-build) and these are considered to support the objectives within the Corporate Plan, emerging new Local Plan and economic development strategy, contributing positively to local economic impact. Local labour and training obligations will also contribute positively to regeneration objectives.
- 1.8 The Development has been designed to be appropriately respectful of and responsive to context in terms of scale, massing and design. There are differing heights and massing across the development (assessed in detail below). Officers have assessed that the massing approach represents a sensitive and appropriate response at this location. The introduction of some scale and height at this location is supported.
- 1.9 The proposed mix and size of units is considered appropriate location. Given the overall good standard of accommodation and amenity space, which includes private amenity for 100% of the units as well as communal amenity space in excess of policy requirements.
- 1.10 Given the scale and proximity of the Development to neighbouring properties, it is acknowledged some impact on the residential amenity of neighbouring properties may ensue, however the scheme has evolved to minimise this potential harm and has been designed to pull away from the nearest residential properties. Impacts have been assessed in detail below.
- 1.11 The scheme would create a new public square fronting Bowes Road and the bus interchange, including areas of new planting and seating. A small

- commercial unit is also proposed with the potential for flexible use, according to local market need which would help to boost the local economy and introduce an active non-residential frontage towards Bowes Road.
- 1.12 The Site is currently used as a car park. The proposal will reduce the number of car parking spaces to restrict car usage from 313 to 21 which is expected to reduce the number of vehicles in the area overall. Surveys were taken on existing trip origin of existing car park users. The results are considered below, but they show: most car park users have the potential to change their travel behaviour; and less than half of the (46%) of existing car park user trips originate in Enfield.
- 1.13 The proposal would substantially reduce vehicle movements generated by the site's use as a car park, particularly during the week. This is expected to have the effect of encouraging sustainable modes of travel such as walking, cycling and public transport and improve air quality by reducing the number of vehicles on the road.
- 1.14 Of the 21-spaces proposed to remain 10 will re-provide LUL spaces and 6 will re-provide station blue badge spaces and 5 spaces will be blue badge spaces for the proposed residential development. There will also be 11 passive blue badge spaces for the proposed residential development and 288 new long and short stay (resident and visitor) cycle parking spaces. The current 22 station cycle spaces will be re-provided as part of the development. Traffic and transportation issues are discussed in further detail below.
- 1.15 The public benefits of the scheme can be summarised as follows:
 - Placemaking benefits, including a sympathetic heritage-led design response – Arnos Grove Station is a Grade II* listed building of unique importance to Enfield. It is one of the most highly regarded examples of Charles Holden's ground-breaking Modernist designs for the Piccadilly line extension. It is a key landmark for the local area. The proposed scheme is designed by RIBA Stirling award winning architects, Maccreanor Lavington. The design, scale and density of the scheme are assessed as have sympathetically responded to this important designated heritage asset positively preserving and enhancing it. The proposals would result in an improved setting, including through the introduction of a new public square to the west of the station building. The Enfield Society, Enfield Conservation Officers, the Conservation Advisory Committee and the Greater London Authority are supportive of the heritage merits and benefits of the scheme. Enfield's independent Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context.
 - Optimising the site capacity by introducing new high-quality housing making effective use of a highly accessible (directly adjacent to a tube station), low density brownfield site for 162 new high-quality rented homes (Build to Rent). All homes would meet, and in some cases exceed, draft London Plan (ItP) Policy requirements for Build to Rent, including minimum tenancies of up to 5 years to all tenants; rent and service charge certainty for the length of the tenancy; and secure on-site management. The proposal would support Ambitions 1, 3, 4 and 5 of Enfield's 'Housing and Growth Strategy' (2020).

- Socially sustainable and balanced housing market The Application Site is located within an area primarily characterised by owner occupied housing and other private tenures. The proposals would introduce affordable housing, supported by London Plan policy and guidance (adopted and draft), which would encourage socially sustainable, balanced housing market and address a lack of affordable homes in the local area enabling local people to access good quality housing.
- Affordable housing, including family housing for local people 40% affordable housing by habitable room, which would meet an identified local need for affordable Discounted Market Rent housing (with 30% at London Living Rent levels), supported by London Plan policy and guidance (adopted and draft). Approximately 56,000 Enfield households could be eligible to access the affordable element. These would be households unlikely to be eligible for council allocated housing but who are also unable to afford private sale housing. All family homes (3-bed) in the scheme are affordable. Viability reviews have been agreed –with potential to direct any surplus towards improving 3-bed / family housing affordability.
- Introducing a compatible land use The proposals would introduce compatible residential-led land use beneficially reducing privacy, noise, air quality, and disturbance issues arising from the current publicly accessible car parking to rear of homes along Brookdale, Walker Close and Arnos Road. The removal of the car parks would replace an existing arrangement of low townscape quality, which does not contribute towards, and potentially detracts from the listed building's significance.
- Apprenticeships, skills and training opportunities for local people Approximately 250 jobs would be created over the construction period.
- A net increase in trees and biodiversity net gain exceeding target –
 introducing 28 net additional trees and 30.80% biodiversity net gain
 (exceeding Environmental Bill / forthcoming Act requirements). The scheme
 increases greening on-site, in accordance with the relevant draft London Plan
 (ItP) Urban Greening Factor target.
- Targeting a carbon neutral borough by 2040 (Enfield Climate Action Plan 2020) Enfield envisages that by 2040, most journeys that originate in the borough will be made by methods that are either low carbon, or do not emit carbon. The proposal would positively contribute to this target and the Council's aim for Enfield to become carbon neutral by 2040.
- A healthy development and less road traffic the loss of car parking has generated significant objection (assessed in detail below). The loss of parking would also, however, result in benefits which would have associated pedestrian, cycle and road safety benefits. The whole borough is an Air Quality Management Area, by prioritising walking and cycling and low carbon transport, the proposals have potential to improve local air quality. This will also support Enfield in achieving the Mayor of London's target to increase active and sustainable modes across London to 80%.

 An improvement in on-site sustainable urban drainage (water management) – The proposals would replace two car parks characterised by impermeable hardstanding with 162 new homes incorporating 50% green roofs, rain gardens, swales and permeable paving - optimising sustainable urban drainage compared to existing.

2.0 Recommendation

- 2.1 That subject to referral to the Mayor of London for his consideration at Stage 2, the Committee resolve to GRANT planning permission and Listed Building Consent and that the Head of Planning or the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a section 106 Legal Agreement providing for the obligation set out in the Heads of Terms below.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 31/03/2021 or within such extended time as the Head of Development Management shall at their discretion, allow; and
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions below.
- 2.4 That delegated authority be granted to the Head of Planning or the Head of Development Management to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Planning Committee.

2.5 Conditions

Full Planning:

- 1. In Accordance with Approved Plans.
- 2. Development Begun no Later than Three Years.
- Materials:
- 4. Boundary Treatment/s:
- 5. Playspace Design:
- 6. Landscaping and Public Realm Implementation Plan:
- 7. Secure by Design:
- 8. Inclusive Design M4(2) and M4(3):
- 9. Sustainable Drainage Strategy including Rainwater Harvesting:
- 10. Sustainable Drainage Strategy Verification Report.
- 11. Lighting Details / Plan (Building & Public Realm):
- 12. Site Management Plan (operational) / Refuse & Recycling Strategy.
- 13. Noise Levels Construction:
- 14. Noise Mitigation Measures (future occupants):
- 15. Disabled Parking.
- 16. Car Park Management Plan (Final).
- 17. Details of Cycle Parking.
- 18. Delivery and Servicing Management Plan (operational).

- 19. Construction Logistics Management Plan (CLMP), produced in line with TfL's latest CLMP guidance.
- 20. Construction Resource Management Plan (CRMP):
- 21. Tree Protective Measures / Construction Works within Root Protection Area
- 22. Habitat Survey (Phase 1).
- 23. Contaminated Land Remediation.
- 24. Contaminated Land Verification.
- 25. Energy Statement.
- 26. Thermal Comfort:
- 27. Communal aerial:
- 28. Details of any Rooftop Plant, Extract Ducts and Fans including Plant Acoustic Report (technical):
- 29. Details of any rooftop plant, extract ducts and fans (appearance):
- 30. Thames Water.
- 31. Fire evacuation lift:
- 32. Electric vehicles:
- 33. Nesting Boxes.
- 34. Access demarcation.
- 35. Taxi stand details
- 36. Blue badge parking and survey

2.6 <u>Listed Building Consent</u>:

- 1. In Accordance with Approved Plans.
- Development Begun no Later than Three Years (LBC)
- 3. The development shall not begin until details of suitable precautionary measures to secure and protect the Grade II* listed station building against accidental loss or damage during the building work has been submitted to and approved in writing by the Local Planning Authority. No such elements may be disturbed or removed temporarily or permanently except as indicated on the approved drawings or without the prior approval in writing of the Local Planning Authority.
- 4. Samples of all the types of external materials and finishes to be used in the proposed development (including windows, doors, balconies, railings, surfacing materials, roof finish, architectural features, brick type, face bond, render, external cladding and paintwork), are to be erected on site and approved in writing by the Local Planning Authority prior to the commencement of the relevant parts of work. The development shall be completed in accordance with the approved details.
- 5. No above ground works shall commence until drawings, including sections, to a scale of 1:20 or larger, detailing all proposed external architectural features including windows (including cills, reveals, heads, window furniture) doors (including jambs, frame, door case, door furniture), roof (parapet detail), balconies, bin stores and all means of enclosure have been submitted to and approved in writing by the Local Planning Authority. The aforementioned features shall be installed in accordance with the approved details.
- 6. No works to any curtilage listed structures shall commence until a full method statement, detail drawings with sections at a scale of 1:20 or

larger, and a detailed schedule have been submitted to and agreed in writing by the Local Planning Authority pertaining to

- a) the proposals for the temporary removal, repair and relocation of the four curtilage listed lamp standards, and
- b) the proposals for the removal of the curtilage listed dwarf walls and railings on the north and south sides of the forecourt

The development shall only be carried out in accordance with the relevant detail drawings, method statement and schedule.

- 7. Any works of demolition shall be carried out by hand only.
- 8. Should any archaeological remains be discovered in the course of development the developer must contact Greater London Archaeology Advisory Service (GLAAS) so that an assessment can be made for the formulation of mitigating measures or the instigation of contingency procedures.
- 9. All new work and finishes and works of making good shall match original work in the existing original fabric in respect of using materials of a matching form, composition and consistency, detailed execution and finished appearance, except where indicated otherwise on the drawings hereby approved.
- 10. The four lamp standards, recovered bricks from the northern dwarf boundary wall and attached railings shall be removed under the supervision of a specialist contractor approved by the local planning authority and stored in a suitable place to be agreed in writing by the local planning authority. Suitable precautions must be taken to secure and protect architectural features against accidental loss or damage during the building work.

2.7 Informatives

- 1) Co-operation
- 2) CIL Liable
- 3) Hours of Construction
- 4) Party Wall Act
- 5) Street Numbering
- 6) Sprinklers
- 7) Surface Water Drainage
- 8) Water Pressure
- 9) Underground Water Supply/Drainage Assets
- 10) Fail Safe Use of Crane and Plant
- 11) Security of Mutual Boundary
- 12) Fencing
- 13) Demolition
- 14) Vibro-impact Machinery
- 15) Scaffolding
- 16) Abnormal Loads
- 17) Cranes
- 18) Encroachment
- 19) Trees, Shrubs and Landscaping
- 20) Access to Railway

21) Sustainable Infrastructure

Section 106 Heads of Terms

- 2.8 The NPPF requires that planning obligations must be:
 - (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and,
 - (c) Fairly and reasonably related in scale and kind to the development.
- 2.9 Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.
- 2.10 The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. The Council's Infrastructure Funding Statement (2019/2020) sets out planned expenditure over the current reporting period (2020/21).
- 2.11 These are the Heads of Terms proposed. Monetary contributions will be updated by way of update report:

1. Affordable housing:

- a. Minimum of 40% by habitable room (39.5% based on units);
 - a. Tenure mix 30% London Living Rent (LLR) and 70% Discounted Market Rent (DMR)
- b. Rents set up to 65-70% of open market rent rates subject to the GLA's household income cap in place at the time of letting;
- c. Marketing of Shared Ownership homes prioritising households that live or work in the Borough;
- d. All related communal open space and play space in a particular Block or Plot to be available to all residents (irrespective of tenure);
- e. Quality standards;
- f. Affordable housing secured in perpetuity.

2. Viability Review Mechanisms:

- a. Early Stage Review (if no "substantial commencement" within 24 months);
- b. Late Stage Review (prior to 75% of private residential units being sold or let); and
- c. Early and Late Stage Reviews capped at 40% Affordable Housing ((30% London Living Rent (LLR) and 70% Discounted Market Rent (DMR)).

3. Build to Rent requirements:

- a. 15-year minimum covenant;
- b. Clawback clause:
- c. Self-contained and let separately;
- d. Unified management and ownership;

- e. Tenancies of up to 5-years available to all;
- f. Rent and service charge certainty for the length of the tenancy;
- g. On-site management;
- h. Complaints service in place; and
- i. No up-front charges etc.

4. New homes Sustainable Transport Package:

- a. Car Club Membership for 3 years (driving credit to be agreed) and reasonable endeavours to secure a car club space and operator with the Council:
- b. Oyster Card (credit to be agreed); and
- c. London Cycling Campaign Membership for 1 year / household.

5. <u>Sustainable Transport Infrastructure (Healthy Streets and improvements)</u>

a. Local improvements in line with ATZ / Healthy Streets Assessment to improve local pedestrian, cycle and other transport related infrastructure (to be agreed).

6. Local Pedestrian Infrastructure Surveys:

- a. Applicant to agree to make funds available for surveys to assess the impact of the proposals (before and after occupation).
- b. Surveys to identify local improvements (related to the development), such as a pedestrian crossing along Bowes Road. Implementation of necessary improvements (related to the development) via Section 278 agreement (to be agreed).

7. <u>Drop off Surveys and Highway Alterations:</u>

- a. Drop off surveys and related highway alterations related to the closure of the station car park.
- b. Implementation of necessary improvements (related to the development) via Section 278 agreement.

8. <u>Local Car Parking Controls: Management and Monitoring:</u>

- a. A contribution towards monitoring and consultation on an extension to the CPZ near the development
- b. Local parking consultation and extension: If post occupancy surveys show impacts with the existing CPZ, then funds provided for consultation on potential extension (to be agreed).

9. New Resident Parking Exemption

- a. Resident car ownership would be managed by the developer, including a clause within resident contracts restricting them from applying for or being eligible for on-street parking permits within the relevant Controlled Parking Zone.
- The CPZ exemption will be secured via the S106 agreement using powers under S16 of the Greater London Council (General Powers) Act 1974

10. Station Access Road

- a. Improvements associated with the development of the site, within the red line boundary will be implemented through a Section 278.
- b. The proposed alterations to site accesses will require works to the site frontage along the highway which would be delivered by LBE through a Section 106 contributions

11. Travel Plan monitoring (£tbc)

- a. A Travel Plan will be prepared and implemented, managed by a Travel Plan Coordinator appointed by the Developer;
- b. Travel Plan Monitoring fee (to be agreed).and commitment to review;
- c. Appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives including TRICS compliant surveys.

12. Energy

- a. First priority DEN connection with cascade mechanism;
- b. Development to provide no less than a 35% improvement in total CO² emissions arising from the operation of the development and its services over Part L of Building Regs 2013.
- c. Non-domestic element to meet a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency.
- d. Revised Energy Statement to be submitted;
- e. Be Seen (Post construction monitoring). Post construction monitoring as per 'be seen' guidance.

13. Carbon Offsetting financial contribution:

- a. Payment of off-set contribution;
- b. Sign up to GLA energy monitoring platform.

14. Employment & Training:

- a. Local Labour (during construction phase); and
- b. Employment & Skills Strategy submitted and approved prior to commencement of Phase 1 and each Plot in Phase 2 using reasonable endeavours to secure: (i). 25% of local workforce, (ii). 1 x apprentice or trainee for every £Xm contract value (figure to be agreed once formula agreed) (financial contribution to be provided if not possible formula to be agreed), (iii). Quarterly apprenticeship reporting & targets, (iv). Local goods and materials, and (v). partnership working with local providers/ programmes).

15. Public Realm

- a. Public Realm Use and maintenance of the square to be delivered as a publicly accessible space and maintained by the developer
- b. Public access ensuring public access to proposed square (365 days, 24/7).

16. Play Space

a. Play space provided on site shall be accessible to all housing tenures.

17. Architect Retention Clause

a. Retention of architects

18. Other:

- a. Financial contributions to be index-linked;
- b. Considerate Constructors Scheme;
- c. Health care:
- d. LBE monitoring fee (max 5% of financial contributions);
- e. s278 agreement in line with specification to be agreed, subject to surveys.

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- 6.0 Consultations
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- 8.0 Material Planning Considerations
- 9.0 Equality Statement
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- 12.0 Community Infrastructure Levy
- 13.0 Conditions

3.0 Site and Surroundings

- 3.1 The site comprises two existing car parks at Arnos Grove underground station located in the South West of the borough in the Southgate Green Ward. The two surface level car parks are referred to in the application as Sites A and B with Site A to the west of the station building and Site B to the east. Arnos Grove Underground Station serves the Piccadilly line between Cockfosters station and Heathrow airport.
- 3.2 The site is well connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 4-6a with 4 being 'good' and 6a 'excellent'. As well as the underground station the site is well served by buses. A bus interchange is located directly to the front of the station on Bowes Road. Also, along Bowes Road lie a number of commercial and retail units with many of these containing residential accommodation above. The ground floor units contain a mixture of uses, including estate agents, convenience stores, cafes, food outlets and hairdressers. The Arnos Arms public house and car park is also located in close proximity to the station and residential properties lie slightly further along Bowes Road to the east. Other uses in close proximity include an indoor swimming pool, a library and an NHS medical clinic. Arnos Park and a number of places of worship and schools are also nearby.

Site A

- 3.3 Site A, the car park located to the west of the station and railway tracks, is approximately 0.68 ha in size, provides 180 spaces and six blue badge holder spaces. The Site contains structures listed by virtue of the curtilage of the Grade II* listed station. The car park is situated on a slightly raised plateau, with the land banking down to the east, west and north, resulting in approximately a one-storey level change across the Site. Site A generally falls towards to the north. The Site falls from approximately 45mAOD near Bowes Road to approximately 36mAOD in the north.
- 3.4 Within Brookdale, Nos 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31 would be in closest proximity to the Development. The rear of these properties would face the development and would typically accommodate bedrooms at first floor level and living and/or dining rooms at ground floor. On Bowes Road, Nos 348, 350, 352 and 354 would be in the closest proximity to the development. These properties are characterised by commercial uses on the ground floors and residential accommodation situated above.

An area of dense trees and shrubs designated as Metropolitan Open Land (MOL), lie to the north of Site A. In addition, the eastern edge of Site A is bound by dense trees and shrubs designated as a Site of Borough Importance for Nature Conservation (SINC), and Arnos Grove station. Beyond this lie the Piccadilly railway tracks which form part of a Wildlife Corridor designation. Site A is bound to the south by the A1110 Bowes Road, and to the west by the gardens of properties fronting Brookdale, a residential street of two-storey terraces and detached houses.

Site B

- 3.6 Site B, the car park located to the east of the station and railway tracks, is approximately 0.45 ha in size and provides 117 spaces, and 10 LUL staff spaces. This Site comprises hardstanding and adjoins a wall that forms part of the Grade II* listed station. To the east, Site B is bound by gardens of two-storey houses which form part of Arnos Road, and to the south by the A1110 Bowes Road. Within Arnos Road No's 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21 are in closest proximity to the development and within Bowes Road The Arnos Arms at No.338 Bowes Road is in closest proximity. Walker Close to the north of the Site is also in close proximity with Nos 1, 2, 3, 4, 5, 6 and 27 being the most relevant.
- 3.7 With regards to the Arnos Road properties, the rear of the properties face onto the Proposed Development, and the rooms typically located at the rear would comprise bedrooms at first floor level and lounge/kitchen/dining rooms at ground floor level. Whilst in Walker Close because of the orientation of these properties it is the southern side elevations of the properties that would face the Proposed Development.
- 3.8 A series of mature trees line the west boundary of the Site which also form part of the SINC designation. Beyond this, is the embankment and London Underground Piccadilly line tracks which are also within the Wildlife Corridor designation. The Arnos Arms pub is located east of the Site on Bowes Road, and is a non-designated heritage asset.

Sites A and B

3.9 To recap the above the properties in closest proximity to the Proposed Development are as follows:

Bowes Road – No's 348, 350, 352 and 354 Brookdale - No's 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31 Walker Close – No's 1, 2, 3, 4, 5, 6 and 27 Arnos Road – No's 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21 The Arnos Arms 338 Bowes Road

- 3.10 The following policy designations / characteristics apply to the site:
 - Flood Risk: The Site is located within Flood Zone 1 (classed as 'low risk').
 - Listed Building: The underground station and items within the curtilage
 - Local Centre: The frontage of Site A and the Underground Station are within Bowes Road Local Centre:

- Metropolitan Open Land (MOL): The area to the north of Site A, within the Site boundary is designated Metropolitan Open Land;
- North Circular Area Action Plan Opportunity Site (Site 7);
- New Southgate Place Shaping Area;
- Place Shaping Priority Area / Regeneration Priority Area / Area Action Plan;
- Site of Borough Importance for Nature Conservation (SINC): The site is adjacent to (but outside of) a SINC which runs along the railway track in the centre and to the north and also encompasses a Wildlife Corridor; and
- Tree Preservation Order: There is a cluster of Tree Preservation Orders (TPOs) to the north of Site B, adjoining the Site boundary.

4.0 Proposal

- 4.1 Changes to the Use Classes Order 1987 came in to force on the 1st September 2020. The Regulations that introduced the changes require Local Planning Authorities to determine applications that were submitted prior to this date in accordance with the previous use classes. This report therefore refers to the previous use classes throughout.
- 4.2 This is an application for the erection of four Built-to-Rent blocks comprising 162 residential units (Class C3) and a flexible use ground floor unit (A1/A3/A4) together with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works. An associated Listed Building Consent application also accompanies the application for partial demolition and rebuilding, retention and refurbishment of four existing listed lampposts two of which are relocated to accommodate a new public square.
- 4.3 The building heights and unit numbers would be as follows:
 - Block A01, Site A: part 1-storey, part 4-storeys (34-units)
 - Block A02, Site A: part 6, part 7-storeys, with elements at lower ground (66)
 - Block B01, Site B: 3-storeys (16-units)
 - Block B02, Site B: part 5 storeys, part 6-storeys (46-units)
- 4.4 The tallest of these buildings Block A02: will be located towards the northeastern corner part of the site nearest to Arnos Park at the rear, with the shortest building within the group of four (Block B01: 3-storeys being located at the front of the site, nearest to Bowes Road to the south-west. Block A01 includes a 1-storey element fronting the proposed square.
- 4.5 The emphasis of the proposed buildings' fenestration is on the horizontal to tie-in with Charles Holden's art-deco architecture of the station and also the art-deco reflected in the locality and surrounding townscape. The design of the scheme is the result of substantial pre-application engagement to produce high-quality building's and public realm which incorporates and reflects the vernacular of the surrounding townscape. In addition, the articulation and materiality of the buildings have been carefully considered to provide a contemporary and sympathetic interpretation of the Grade II* station and associated heritage assets.

- 4.6 Some level of parking for the proposed development will be retained in the form of blue badge spaces and also the re-provision of spaces for London Underground Ltd (LUL) staff. Otherwise the proposal will be car free in line with current and emerging Enfield and London Plan policy, as the Borough and city move closer to addressing climate change by facilitating such measures as car free development with good public transport links such as this.
- 4.7 The scheme proposes the provision of 40% affordable housing (by habitable rooms), with a breakdown of 30% London Living Rent and 70% Discounted Market Rent. The remainder of the units would be let at open market rent levels.
- 4.8 As is typical in Built-to-Rent developments a resident/tenants' lounge, concierge and gym will be available for everyone living at the development. The proposal also includes 158 sq.m of doorstep play, plus 150 sq.m of 'incidental' playspace for 0-5-year olds: this will be spread across both Sites A and B. In addition, a further 120 sq.m of play 'opportunity' for children aged 5+ is proposed within Site A, which also houses the affordable tenure units.
- 4.9 In terms of cycle parking the proposal will provide 282 long stay cycle parking spaces for residents which will be secured and covered within the buildings. Six external short stay visitor cycle parking spaces will also be provided. With regards to car parking, five blue badge spaces are proposed (3% of the total number of homes), with the landscape within the scheme being designed in such a way that a further six blue badge spaces (10% in total, or a further 7%), could become available should the demand arise.
- 4.10 All of the above matters are discussed further in the main body of the report below.

5.0 Relevant Planning Decisions

- 5.1 In October 2017 an application for the conversion of the first floor of the Arnos Arms, 338 Bowes Road, from public house accommodation to 4 x 1-bed self-contained flats involving new entrance at rear (application reference 17/01590/FUL) was granted planning permission.
- 5.2 Over the last 20-years there have been a number of listed building consent applications for minor alterations to the station building have been submitted. One of these was a 2004 Listed Building Consent application (application reference LBC/03/0020/2) for repair and refurbishment of historic features within the station. This was approved in 2005. Further applications have been made since then for works such as the installation of a ticket checking kiosk, replacement cabins on the platform and other repairs.
- 5.3 In September 2019 an EIA Screening Opinion request was made to the Council to establish whether the proposed works would constitute EIA development as assessed against Regulation 6(1) of the EIA Regulations. The council agreed that the Development did not constitute EIA development. (Application reference 19/03312/SO)

Pre-application and changes post submission

- 5.4 The scheme has been the subject of an extensive pre-application process in line with best practice and as recommended in the NPPF. This process included meetings and workshops with officers, independent design review by Enfield Design Review Panel, presentation to planning committee at pre-application stage (a Technical Briefing), stakeholder engagement and public consultation and engagement. The scheme proposals have evolved during the course of negotiations with the applicants (including during pre-application stages) in response to comments.
- 5.5 Some revisions have been made to the scheme during the assessment of the application. These revisions have comprised as follows:
 - Revised boundary treatments have been proposed on both Sites A and B however the final details of these (height and materials) are subject to a planning condition);
 - Changes to incorporate a balcony in Building A01 to one unit that previously did not have one. All units now have at least a 5 sq.m private balcony; and
 - Building B01 external amenity and defensible space: Changes have been made to alter external amenity space provided to the north and west of building B01 from communal to private resulting in a minor change to the communal amenity from 3,438sqm to 3,230sqm and an increase in the Urban Greening Factor score from 0.417 to 0.419. Additionally, a 700mm concrete spandrel panel has been added to the four eastern ground floor units to B01 to provide security and privacy to those units.
- 5.6 The indicative accommodation schedule (discussed later in this report) demonstrates that the proposals have been designed to offer a range of housing sizes appropriate for the location of the site. Policy standards contained within the London Plan, the Mayor's Housing SPG and Enfield's Development Management DPD, particularly DMD Policy 8 General Standards for new residential development seek to ensure residential developments are of the highest quality. In accordance with these policies the proposed housing units will meet or exceed the minimum space standards identified within Table 3.3 of the London Plan and respond to the design principles contained in the Mayor's Housing SPG 2012. Outdoor amenity space standards are also discussed later in this report.
- 5.7 The application documents demonstrate how the scheme has evolved through the pre-application process, and post submission, and that the proposals are of high quality, comply with the London Housing Design Guide and Lifetime Home Standards.

6.0 Consultations

- 6.1 In November 2015, the Council adopted a Statement of Community Involvement (SCI), which sets out policy for involving the community in the preparation, alteration and review of planning policy documents and in deciding planning applications.
- 6.2 Paragraph 3.1.1 of the adopted version sets out the expectation of the Council:

"The Council aims to involve the community as a whole: to extend an open invitation to participate but at the same time ensure that

consultation is representative of the population. To achieve this, a variety of community involvement methods will need to be used. Targeted consultation of stakeholders and interest groups, depending upon their expertise and interest and the nature and content of the Local Plan documents, or type of planning application, will be undertaken."

Paragraph 5.3.6 goes on to state:

"In the case of 'significant applications', additional consultation will be carried out depending upon the proposal and site circumstances:

Developers will be encouraged to provide the community with information and updates on large scale or phased developments using websites, public exhibitions and newsletters"

Applicant consultation

- 6.3 Communications company Concillio, on behalf of the applicant, have submitted a Statement of Community Involvement (SCI) as part of the application to demonstrate how they engaged with the local community. The SCI states that the programme of consultation ran from June 2019 to March 2020, with the digital element live from 7th November 2019 to 13th December 2019 and included seven meetings with political stakeholders; meetings with three key community groups; a 'Meet the Team' event; one public consultation over 2-days; and various electronic and non-electronic (leaflets and posters) communication.
- This demonstrates that the applicants have made significant efforts to engage with local residents, businesses and stakeholders to try and address questions, queries and concerns in relation to the proposal.

Technical briefing

6.5 A Technical Briefing with Planning Committee Members was held on 5th November 2019. The purpose of the Briefing was to provide an overview of the scheme to date however the Briefing was not a forum for discussion of the proposal. The briefing was well attended by Members.

Public

- 6.6 In total 1,349 neighbouring properties were consulted. The consultation period ran for 21-days from the 19 May 2020 to the 09 June 2020. In addition, site notices were displayed in close proximity to the site and a press advert was placed in the Enfield Independent on the 13 May 2020.
- 6.7 In addition to the initial consultation the application was subject to a second consultation to update and clarify the development description. The second consultation period ran for a further 21-days from the 23 October 2020 with further site notices displayed a further press advert placed on the 28 October 2020.
- 6.7 The number* of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

- 98 responses to the full planning application have been received
- 28 responses to the Listed Building Consent application have been received
- 2 petitions have been received with one listing 32-signatories (submitted by Cllr Daniel Anderson) and one listing 33-signatories (Bowes Road residents). It is noted that the 32-signatory petition pre-dates the submission of the application. Concerns raised are summarised below along with individual comments.
- Number of supports received: 3
- Number of neutral representations received: 1

*some people have submitted comments more than once and these have been counted separately

6.8 Material concerns are listed below with the relevant section of the report signposted in brackets:

6.8.1 Objections

- Too close to adjoining properties (Para. 8.9.1 onwards)
- Too high (Para. 8.7.1 onwards)
- Unpleasant environment for future occupiers in terms of noise generating from the station (Para. 8.6 onwards)
- Would ruin existing views (Para. 8.7.1 onwards)
- Overpopulated (density) (Para. 8.4.1 onwards)
- Increased traffic particularly along Bowes Road (Para. 8.10.1 onwards)
- Increased pressure and displacement of parking (Para. 8.2.1 and 8.10.1 onwards)
- Increased pressure on local facilities e.g. schools (Para. 8.17 onwards)
- Does not align with policy (Para. 8.2 onwards)
- Inadequate access (Para. 8.9.13 onwards)
- Inadequate parking provision (Para. 8.2 and 8.10 onwards)
- Affect local ecology (Para. 8.13 onwards)
- Out of keeping with the character of the area (Para. 8.6 onwards)
- Loss of privacy / overlooking (Para. 8.9 onwards)
- Loss of light (Para. 8.9 onwards)
- Light pollution (Para. 8.9 onwards)
- Noise pollution including from construction (Para. 8.9 onwards)
- Air pollution including from construction (Para. 8.16 onwards)
- Overshadowing (Para. 8.8.9 onwards)
- Close to adjoining properties ((Para. 8.8.9 onwards)
- Inappropriate height for a building in close proximity to Grade II* listed building (Para. 8.7 onwards)
- The retail unit will adversely impact retailers nearby (Para. 8.2 onwards)
- Lack of truly Affordable Housing / would not be affordable (Para. 8.2 onwards)
- Adversely impact health and wellbeing (Para. 8.17 onwards)
- Existing trees should remain (Para. 8.11 onwards)
- Increase risk of flooding (Para.8.12 onwards)
- Not enough publicity and consultation (Para. 6.0 onwards)
- Appropriate public cycle spaces need to be provided (Para. 8.10 onwards)

6.8.2 Support

- Removing the car park will encourage more sustainable travel patterns to the station.
- Alternatives exist for users of the station.
- These new homes with no car parking except for disabled residents, with plentiful bike parking and a great level of public transport access, will help support residents in the car-free lifestyle that we need to see increasing across Enfield with its growing population.
 - The development will provide a new public square, helping to improve the public realm in Arnos Grove to the benefit of other residents and visitors.
- This area is severely lacking low density, sympathetically designed affordable rent housing for key workers and others with a need to access to central London but unable to get on the housing ladder
- Pleased that the buildings will be for rent with a high proportion of affordable properties
- The designs are of a high quality and in keeping with the station
- Pleased that there will be shops/cafes in the development
- Pleased that the development will encourage the use of public transport and will eliminate all but essential disabled parking on the site
- It is a forward-looking proposal for Enfield
- 6.8.3 Consultation responses that fall outside of the remit of Planning (i.e. are non-material are given below:
 - Negative effect on prices of property
 - Negatively impact on ambience and the immediate neighbourhood
 - Impact on safety for people not able to use car park and having to walk further to where cars are parked in surrounding area and fear of safety around the new square at night
 - Fear that further defacing of the architectural distinction of the station buildings will occur
 - Concerns about the accuracy of the documents and images submitted (ie. 'artistic license')
 - Not appropriate to be assessing application in the wake of Covid-19
 - Need to increase public transport if there is a wish to stop people using cars
 - Tenancies are all short-term
 - Area has become over-developed
 - Development is 'profiteering'
- 6.9 The following local groups/societies made representations:
- 6.9.1 Bowes Road Residents Group (comments summarised):
 - The interests of the developers are being put before residents.
 - Recent major residential developments near the Homebase Depot site and on the A406 has already damaged the environment and quality of life for residents of Bowes Road. This development will add even more people to the population which means local infrastructure and services will be further over-stretched.
 - Traffic along Bowes Road is very heavy and fast moving outside rush hours between the station and the A406. Air pollution and noise have got substantially worse over recent years and pedestrian and cyclist safety is deteriorating significantly.

- The loss of the station car parks will increase car movements along Bowes Road as these displaced cars seek alternative parking and people drive to the station to drop off travellers.
- The problems along Bowes Road are recognised in the "Transport Assessment Final Document" drafted by Pell Frischmann, submitted with the application by Connected Living London.
- If these proposals are to be supported by the Council, it is imperative that a crossing at the library/clinic/swimming pool is provided on Bowes Road to mitigate residents' concerns about safety for pedestrians and cyclists. There is also a need to provide traffic calming to reduce the speed of vehicles. Crossing the road to these facilities is very dangerous at the moment and will get worse as a result of this application.

6.9.2 Conservation Advisory Group

The Group at their meeting on 10th March 2020 were supportive of the scheme, provided there was strict conditioning of materials.

6.9.3 The Enfield Society (comments summarised):

The Society accepts the need for additional affordable housing in the Borough and housing for rent. Our key consideration in looking at this application was the impact of the development on the adjacent Charles Holden designed Grade II Listed tube station. We consider that the scheme protects the views of this important landmark building and that the development will provide an improved setting compared to the existing car park arrangements. The Society supports the proposal. The Society is represented on the former Conservation Advisory Committee and note that that group was also broadly supportive of the scheme.

6.9.4 Enfield Transport User Group (ETUG) (comments summarised):

- Loss of parking will restrict access to the station for a very wide range of passengers, some of whose needs should be protected under the Equality Act
- Security and safety issues for people needing to park close to the station and who will now have to walk to their car
- Alternatives to driving are costly
- Increased waiting and travel time for residents as a result of needing to take taxis etc to station
- Loss of parking will impact on local residential streets (overspill into trying to find alternative places to park)
- Costs to widen CPZ may be passed onto residents
- The Piccadilly line will become inaccessible to many and likely to lead to a fall in commuter numbers on the line
- Insufficient parking is proposed for new tenants of the new housing.
- The lack of parking for residents in the proposed development at Arnos Grove is likely to create the same problems for residents in this proposed development. It is one thing to seek to discourage car use, quite another to seek to make life impossible for those who require cars for their everyday lives. People do not only travel to work and back or into town for social events and back; they travel across the UK. Many routes still remain difficult to traverse without a car. Orbital connections other than by car remain an enduring problem for those who live in outer London and the suburbs. The Mayor must stop treating residents as pariahs for

wishing to park at their homes. There needs to be proper provision made for car parking for residents before this proposal is approved.

- 6.9.5 Southgate Green Association On Behalf of Southgate Green Study Group (comments, including updated comments summarised):
 - Southgate Green Association are generally in agreement with the proposal with the following reservations as set out below:
 - The Bus interchange forms part of the planning application site, consideration should be given to improving the street scene in terms of planting, resurfacing materials, street furniture, street lighting including the replacement of the existing obtrusive cycle store with a unit more sympathetic to its surroundings. This could be accommodated by way of planning condition.
 - Provision should be made for a drop off point for cars and taxis delivering passengers for the bus and tube. The interchange should facilitate customers arriving by all means of transport.
 - The End flank wall to the residential block at the Eastern end of the site fronting onto Bowes Road projects too far forward of the general development line and is visually prominent. The design of this element requires further articulation and design merit to offer something of interest to the street frontage.
 - We suggest that the A3 unit use classification should be widened to accommodate nursery school and community uses.
 - The planning submission failed to take into consideration distant views from Arnos Grove and Arnos Park in terms of intrusive impact of the proposed building mass on the hillside and interruption of the treeline.
 - We would have expected provision of on-site parking for the family dwelling accommodation.
 - An opportunity exists to rectify the open party wall at the end of the retail terrace abutting the eastern end of the site this could be achieved by tree planting or a screen wall.

Update

- The bus interchange and bus stops should be included in any assessment, because the number of bus shelters and street furniture, pedestrian crossings etc all impacted on the significance of the listed station.
- Comments previously made in respect of drop-off for cars and taxis still stand. While restrictive aspirations of car ownership might apply to future occupiers of this site, transport hub users shouldn't be disenfranchised as a consequence.
- Block B01 remains dominant in the street scheme, and noticeable with the addition of gates.
- Suggest that the A3 unit classification should be widened to accommodate nursery school and community use. Question how existing mini-buses services for residents- will be accommodated (run by the Friern Barnet old Hospital site (Princess Manor).
- Comments in respect of views from Arnos Park and Pymmes Brook, near Waterfall Road still stand the building will dominate the skyline. The arches are locally listed, and no views have been submitted.
- Question lack of parking for family housing and staff parking, which was understood to be retained.

- Do not support the new high panel fence, which is not considered to be an improvement. Concerned that Holden's design will be diminished by the area of high fencing proposed.

6.10 Councillor Representations

- 6.10.1 Councillor Bambos Charalambous MP objection (comments summarised):
 - Would result in an overdevelopment within the Arnos Grove area, particularly bearing in mind the ongoing Ladderswood development of 517 new homes
 - Development would place huge pressures on the current local infrastructure which could not be met. I am particularly concerned about the inevitable pressure on school places and GP surgeries
 - The loss of parking at Arnos Grove station will impact hugely on nearby local roads as those who would use the car park are looking for parking elsewhere. There is a great concern of increased congestion in surrounding roads and increased difficulties for residents trying to park near their homes. This would inevitably impact on the quality of life for residents. Accessibility to the tube station for the disabled or those unable to access the station by other means of public transport would also be impacted.
- 6.10.2 Councillor Daniel Anderson objection (comments summarised):

The proposed housing would be unaffordable to most Enfield residents:

- The median household income in Enfield is just £34,000, whilst the average salaries of key workers in London is just £27,000.
- 85% of households in the Borough earn less than £60k and so would be unable to afford even the 'affordable' rents.
- To therefore claim that the Discounted Market Rate homes will be 'meaningfully affordable to local front-line key workers (e.g. teachers and nurses)' is, though technically feasible it is not however borne out by the facts.
- What this development will instead bring is approximately 400 more residents into the locality. The local community therefore cannot be expected to support any developments that simply offer opportunities for those currently living in zones 1 and 2 who would be attracted to cheaper accommodation in zone 4.

Displaced parking onto residential streets:

- There is every likelihood that a 24/7 Controlled Parking Zone (CPZ) would be necessitated across much of the surrounding area. TfL should pay for the costs of a potential 24/7 CPZ at least for the next 5 years.

Increased congestion on Bowes Road:

- Arnos Grove Station already has a significant problem as a commuter drop-off point.
- The provision of 288 residents cycle parking spaces along with 22 station and visitor cycle parking spaces will not address this underlying issue.
 Therefore, in addition therefore to the above concerns about commuter parking, commuter drop-off/pick-up is likely to increase and so lead to more congestion in the area.

Bad for the environment:

Many more residents. rather than pay for parking permits a 24/7 CPZ, will
instead concrete over their gardens to create driveways, which will lead to
further drainage problems, such as flash flooding, already identified as an
increased risk by the Environment Agency, thereby working against the
environment and worsening the effect of climate change.

Risk Arnos Grove Station's iconic status:

- Any development of the car parks will undermine Arnos Grove Station's iconic Grade II Star Listed status by ruining its spacious appearance with developments on either side.
- Consultation/Planning Application process, particularly during Pandemic

 Object to the progression of this controversial development during the height of a pandemic. Many of those car park users likely to be impacted by the development are presently, like many working from home, and will, therefore, be unaware of the planning application.

Online petition is referenced: https://www.change.org/p/sadiq-khan-let-s-stop-tfls-proposed-development-of-the-carparks-at-arnos-grove-station

6.11 Statutory and Non- Statutory Consultees

6.11.1 Better Streets for Enfield:

We support this development. We think that removing the car park will encourage more sustainable travel patterns to the station, and having seen the data, we are satisfied that those alternatives exist for users of the station. These new homes with no car parking except for disabled residents, with plentiful bike parking and a great level of public transport access, will help support residents in the car-free lifestyle that we need to see increasing across Enfield with its growing population.

The development will also provide a new public square, helping to improve the public realm in Arnos Grove to the benefit of other residents and visitors.

Please ensure that this sustainable development is approved (8.10).

- 6.11.2 *Economic Development:* No comment
- 6.11.3 *Environmental Health Team:* No objection raised. Conditions pertaining to contaminated land and air quality required. (8.15, 8.16)
- 6.11.4 *Education:* No objection raised however are seeking financial contribution within the scope of the s106 to mitigate the estimated impact arising from additional child places that will be needed (8.17)
- 6.11.5 Housing Renewal: No comment
- 6.11.6 Highways Team: No comment
- 6.11.7 Parks Team: No comment
- 6.11.8 Regeneration Team: No comment

- 6.11.9 SuDS/Flooding/Drainage: No objection subject to conditions requiring Sustainable Drainage Strategy (pre-commencement other than for Enabling Works) and Verification Report. (8.12)
- 6.11.10 Traffic and Transportation Team: No objection.
- 6.11.11 Waste Management: No comment. (8.14)
- 6.11.12 Energetik: Discussions are ongoing between the applicant and the Council's District Heat Network (DHN) setup company 'Energetik' with the intention of confirming that the development will link up to the network (noting that the development has been designed to be able to do so). Should a connection to the DHN prove unfeasible and/or unviable the applicants will move to their reserve strategy (as outlined in the planning application) which assumes an Air Source Heat Pump based solution. (8.13)
- 6.11.13Healthy Urban Development Unit / NHS (HUDU): Have identified that the development will have an impact on local healthcare services, particularly primary healthcare services and infrastructure and as such asked for a financial contribution of £70,595. The applicants have agreed to this payment which is secured in the s106 agreement.
- 6.11.14London Borough of Barnet (Objection):

The development would result in the removal of existing commuter car parks on the site and could, therefore, without mitigation result in an unacceptable impact on highway conditions within the London Borough of Barnet as a result of displaced commuter car parking. The proposal also fails to identify or propose any mitigation measures to account for the increased pressures, for example on school places, that would be likely to result on key infrastructure within the London Borough of Barnet.

- 6.11.15 London Fire Service: No objection. (8.19)
- 6.11.16*London Underground Infrastructure Protection:* No objection, subject to the applicant fulfilling their obligations in terms of legal requirements.
- 6.11.17 *Metropolitan Police Service (Designing Out Crime):* No objection subject to condition.
- 6.11.18 Thames Water: No objection raised.
- 6.11.19 Transport for London (Planning): No objection raised.
- 6.11.20 *Historic England:* No objection.
- 6.11.21 Greater London Archaeology Advisory Service (GLAAS): No objection.
- 6.11.22 Environment Agency: No objection.
- 6.11.23 Natural England: No objection.
- 6.11.24GLA (Stage 1 response) (summarised):

Principle of development: The proposal to introduce residential use to this underutilised site responds positively to London Plan and the Mayor's intend

to publish London Plan policies to increase housing supply and optimise sites, which is supported.

Housing: 40% affordable housing by habitable room and unit is proposed as affordable housing, split 30%/70% London Living Rent/Discount Market Rent exceeds the 35% threshold for the Fast Track Route and so is strongly supported. Grant funding must be investigated and further detail on the Discount Market Rent unit income thresholds should be provided before the proposal can be considered under the Fast Track Route. If eligible for the Fast Track Route, an early stage review must be secured. The unit sizes by affordable housing tenure should be provided, with a preference for larger units to be provided at LLR levels.

Urban design and heritage: The development would have a high quality of design and architecture. A fire evacuation lift should be provided within each building core. The proposal would enhance the setting and historic and architectural significance of the Grade II* listed Arnos Grove station; as such no harm is caused to the listed building.

Transport: Further information is required on electric vehicle charging points provision, a car parking management plan, cycle parking, pedestrian and public realm safety improvements, the demarcation of pedestrian routes and a detailed proposal for the public transport interchange. Relevant conditions and obligations should also be secured (paragraphs 56-73).

Energy, water and urban greening:

Carbon performance and offsetting: The applicant should revise their Be Lean strategy for non-domestic use as the target on-site carbon savings have not been met. The proposed Be Green strategy can be further improved in line with the London Plan. The revised carbon emissions spreadsheet should be submitted for all stages of the energy hierarchy.

For the non-domestic element of the proposed development, the applicant is expected to meet a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency. The applicant is required to consider additional energy efficiency measures to achieve greater carbon savings at the Be Lean stage.

Overheating/cooling strategy: The applicant should consider and provide a revised model representing a robust strategy that can reduce the need for active cooling and ensure that thermal comfort can be met in all units under realistic conditions. Before a discussion is held, the applicant should present a tailor made solution for the development. Further justification on an effective overheating/cooling strategy is required.

DEN connection: The discussions with the DHN operator and the applicant are still on-going. Connecting to the proposed Arnos Grove district heating network would provide 51 tonnes CO2 savings per annum, being the essential part of the energy strategy. Therefore, discussions with the operator should continue to demonstrate that the connection is being actively pursued. A condition on this should be applied.

Update

6.11.25A further updated response was received from the GLA in September 2020 confirming that outstanding matters had been resolved other than the provision of fire evacuation lifts in the buildings and further investigation into an effective overheating/cooling strategy (i.e. thermal comfort for future occupiers of the development); and for the non-domestic element of the proposal to meet a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency. (Conditions pertaining to these matters are recommended by Officer's).

6.11.26 Design Review Panel:

The scheme was presented to Enfield's Design Review Panel in September and December 2019. The DRP meetings followed from a series of preapplication meetings where the Council's design and planning officers discussed the overall bulk, scale and massing with the applicant, as well as principles for materiality and relationship with the surrounding built context.

The main points from the Panel's latter response is summarised as follows:

- Overall it was felt that the scheme had developed in the time between reviews and that the height and scale was appropriate for the surrounding context of low rise suburbia and shopping parade;
- Entrance frontages that were flanked or primarily fronted with refuse stores and bike sheds were not supported as these created blank or inactive frontages;
- The panel accepted that the constraints of the site meant the (previously proposed) gable end building along the street frontage was now absent from the scheme (since the last review) but accepted that the various requirements of the site meant it was difficult to deliver;
- Blocks B01 and B02 felt more unresolved and the panel were not convinced by the massing strategy on B01 as it could be blocking views of the station drum from the Eastern approach. It was suggested to pull it back from the street in order to allow a better view of the drum;
- The panel were not clear on the purpose of rear garden / entrance area of B02, i.e. private amenity or communal garden? There was also concern with the gating of the western street to enclose the TfL staff parking and the location of bike and refuse stores;
- The panel encouraged the design team and client to continue pushing to create a new access route to Walkers Close to allow access to Arnos Park and at least safeguard a route on site both for pedestrians and for trackside vehicle access;
- In relation to heritage overall the approach of consistent "background" buildings continued to be supported. The Panel also supported the principle of protecting the silhouette and shape of the drum by working to not place buildings behind it; and
- Lastly, in relation to heritage the approach to materials was considered interesting with the potential to develop a unique and positive interpretation of the local palette of materials, the Holden style and art deco references noted.
- 6.11.27 Planning Committee Pre-application / Technical Briefing: The proposal was presented to Planning Committee Members on the 5th November 2019. This was a technical briefing rather than a discussion forum and enabled Members to seek further information in relation to technical detail and/or clarification where needed.

7.0 POLICY

The London Plan – Existing and Intend to Publish

7.1 The scheme has been assessed against policies in both the existing and London Plan (Intend to Publish). As the London Plan (Intend to Publish) has been subject to a full examination and is close to adoption, it can be given substantial material weight however it is noted that in the London Plan, as with all policy, there are often tensions between individual and over-arching policies. This would be the case in relation to taller buildings and density for example; whereby policies may be simultaneously advising against height whilst also requiring density to be delivered, and not every site will be able to comply with these requirements. As such in these instances the Local Planning Authority seeks to weigh up the overall wider benefits of a scheme whilst determining the key requirement that the scheme should deliver. Whilst the consistent aim across policy is the requirement to deliver housing at the required level, the tension in policy terms often lies with how that is delivered.

The London Plan 2016

Policy 4.12: Policy 5.1:

Policy 5.2: Policy 5.3:

7.2 The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:

Policy 2.6:	Outer London: vision and strategy
Policy 2.7:	Outer London: economy
Policy 2.8:	Outer London: transport
Policy 2.14:	Areas for regeneration
Policy 3.1:	Ensuring equal life chances for all
Policy 3.2:	Improving health and addressing health inequalities
Policy 3.3:	Increasing housing supply
Policy 3.4:	Optimising housing potential
Policy 3.5:	Quality and design of housing developments
Policy 3.6:	Children and young people's play and informal recreation
	facilities
Policy 3.7:	Large residential developments
Policy 3.8:	Housing choice
Policy 3.9:	Mixed and balanced communities
Policy 3.10:	Definition of affordable housing
Policy 3.11:	Affordable housing targets
Policy 3.12:	Negotiating affordable housing on individual private residential
	and mixed use schemes
Policy 3.13:	Affordable housing thresholds.
Policy 3.14:	Existing housing
Policy 3.15:	Co-ordination of housing development and investment.
Policy 3.16:	Protection and enhancement of social infrastructure
Policy 3.17:	Health and social care facilities
Policy 3.18:	Education facilities
Policy 3.19:	Sports facilities
Policy 4.1:	Developing London's economy

Improving opportunities for all

Minimising carbon dioxide emissions

Sustainable design and construction

Climate change mitigation

Policy 5.5: Decentralised energy networks

Policy 5.6: Decentralised energy in development proposals

Policy 5.7: Renewable energy

Policy 5.9: Overheating and cooling

Policy 5.10: Urban greening

Policy 5.11: Green roofs and development site environs

Policy 5.12: Flood risk management Policy 5.13: Sustainable drainage Policy 5.15: Water use and supplies

Policy 5.18: Construction, excavation and demolition waste

Policy 5.21: Contaminated land

Policy 6.9: Cycling Policy 6.10: Walking

Policy 6.12: Road network capacity

Policy 6.13: Parking

Policy 7.1: Lifetime neighbourhoods
Policy 7.2: An inclusive environment
Policy 7.3: Designing out crime
Policy 7.4: Local character
Policy 7.5: Public realm
Policy 7.6: Architecture

Policy 7.14: Improving air quality

Policy 7.15: Reducing noise and enhancing soundscapes

Policy 7.18: Protecting local open space and addressing local deficiency

Policy 7.19: Biodiversity and access to nature

Policy 7.21: Trees and woodland

Intend to Publish London Plan 2020

- 7.3 The Examination in Public (EiP) on the new London Plan was held between 15th January and 22nd May 2019. On the 9th December 2019, the Mayor issued to the Secretary of State his intension to publish the London Plan. On 13 March 2020, the Secretary of State issued Directions to change a number of proposed policies as identified by (*) in the list below. In line with paragraph 48 of the NPPF, the weight attached to this Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF.
- 7.4 Whilst the London Plan (2016) remains, given the advanced stage that the Intend to Publish version of the London Plan has reached, the emerging document holds significant weight in the determination of planning applications (although there is greater uncertainty about those draft policies that are subject to the Secretary of State's Direction.
- 7.5 The following London Plan (Intend to Publish) policies are considered particularly relevant:

D2: Infrastructure Requirements for Sustainable Densities

D3: Optimising Site Capacity Through the Design-led Approach:

Optimising site capacity through the design-led approach – sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.

D4: Delivering Good Design

D5: Inclusive Design

D6: Housing Quality and Standards:

Introduces a stronger policy on housing standards including minimum space standards.

D7: Accessible Housing

D8: Public Realm

D9: Tall Buildings:

Sets out that boroughs should identify locations (including identifying where tall buildings may be an appropriate form of development subject to meeting other requirements of the plan); impacts (visual, functional, environmental and cumulative); and incorporate free to enter publicly-accessible areas.

D11: Safety, Security and Resilience to Emergency

D12: Fire Safety

D13: Agent of Change: Identifies that the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses sits with the proposed new noise-sensitive development, for example if a new residential development is proposed near to an existing noise generating use ten the onus lies with the proposed development to ensure noise mitigation measures are incorporated into the design rather than expecting the existing noise generating use to stop or reduce.

D14: Noise

E3: Affordable Workspace

E11: Skills and Opportunities for All

H1: Increasing Housing Supply (*):

Sets new ambitious targets for housing completions. Enfield's ten-year housing target will now be 18,760 (previous target 7,976 for the period 2015-2025).

H4: Delivering Affordable Housing

H10: Housing Size Mix (*)

H11: Build to Rent: Takes a positive approach to Build to Rent developments (which satisfy criteria) noting that Build to Rent can contribute to the delivery of new homes.

HC1: Heritage Conservation and Growth

GG1: Building Strong and Inclusive Communities

GG2: Making the Best Use of Land

GG3: Creating a Healthy City

GG4: Delivering the Homes Londoners Need

G1: Green Infrastructure

G5: Urban Greening

G6: Biodiversity and Access to Nature

G7: Trees and Woodlands

S4: Play and Informal Recreation

SI1: Improving Air Quality

SI2: Minimising Greenhouse Gas Emissions

SI3: Energy Infrastructure SI5: Water infrastructure

SI5: Water infrastructure

SI6: Digital Connectivity Infrastructure

SI7: Reducing Waste and Supporting the Circular Economy

SI12: Flood Risk Management

SI13: Sustainable Drainage

T1: Strategic Approach to Transport

T2: Healthy Streets

T3: Transport Capacity, Connectivity and Safeguarding

T4: Assessing and Mitigating Transport Impacts

T5: Cycling T6: Car Parking

T9: Funding Transport Infrastructure Through Planning

Local Plan - Overview

7.6 Enfield's Local Plan comprises the Core Strategy, Development Management Document, Policies Map and various Area Action Plans as well as other supporting policy documents. Together with the London Plan, it forms the statutory development policies for the borough and sets out planning policies to steer development according to the level it aligns with the NPPF. Whilst many of the policies do align with the NPPF, London Plan (2016) and London Plan (Intend to Publish), it is noted that these documents do in places supersede the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan.

Local Plan - Core Strategy

- 7.7 The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the borough is sustainable.
- 7.8 The following local plan Core Strategy policies are considered particularly relevant:

Core Policy 1: Strategic Growth Areas

Core Policy 2: Housing Supply and Locations for New Homes

Core Policy 3: Affordable Housing
Core Policy 4: Housing Quality
Core Policy 5: Housing Types

Core Policy 9: Supporting Community Cohesion

Core Policy 17: Town Centres

Core Policy 20: Sustainable Energy Use and Energy

Infrastructure

Core Policy 21: Delivering Sustainable Water Supply, Drainage

and Sewerage Infrastructure

Core Policy 24: The Road Network
Core Policy 25: Pedestrians and Cyclists

Core Policy 26: Public Transport

Core Policy 28: Managing Flood Risk Through Development

Core Policy 29: Flood Management Infrastructure

Core Policy 30: Maintaining and Improving the Quality of the

Built and Open Environment

Core Policy 31: Built and Landscape Heritage

Core Policy 32: Pollution

Core Policy 34: Parks, Playing Fields and Other Open Spaces

Core Policy 36: Biodiversity

Core Policy 44: North Circular Area Core Policy 45: New Southgate

<u>Local Plan - Development Management Document</u>

DMD 77:

DMD 78:

DMD 79:

DMD 80:

DMD 81:

Green Chains

Landscaping

Nature Conservation

Ecological Enhancements

Trees on Development Sites

- 7.9 The Council's Development Management Document (DMD) provides further detail and standard based policies by which planning applications should be determined. Policies in the DMD support the delivery of the Core Strategy.
- 7.10 The following local plan Development Management Document policies are considered particularly relevant:

dered particularly relevant:		
DMD 1:	Affordable Housing on Sites Capable of Providing 10 units or more	
DMD 3:	Providing a Mix of Different Sized Homes	
DMD 6:	Residential Character	
DMD 8:	General Standards for New Residential Development	
DMD 9:	Amenity Space	
DMD1 0:	Distancing	
DMD 28:	Large Local Centres, Small Local Centres and Local Parades	
DMD 37:	Achieving High Quality and Design-Led Development	
DMD 38:	Design Process	
DMD 43:	Tall Buildings	
DMD 44:	Conserving and Enhancing Heritage Assets	
DMD 45:	Parking Standards and Layout	
DMD 47:	New Road, Access and Servicing	
DMD 48:	Transport Assessments	
DMD 49:	Sustainable Design and Construction Statements	
DMD 50:	Environmental Assessments Method	
DMD 51:	Energy Efficiency Standards	
DMD 52:	Decentralized Energy Networks	
DMD 53:	Low and Zero Carbon Technology	
DMD 54:	Allowable Solutions	
DMD 56:	Heating and Cooling	
DMD 57:	Responsible Sourcing of Materials, Waste Minimisation and Green Procurement	
DMD 58:	Water Efficiency	
DMD 59:	Avoiding and Reducing Flood Risk	
DMD 60:	Assessing Flood Risk	
DMD 61:	Managing surface water	
DMD 62:	Flood Control and Mitigation Measures	
DMD 64:	Pollution Control and Assessment	
DMD 65:	Air Quality	
DMD 66:	Land Contamination and instability	
DMD 68:	Noise	
DMD 69:	Light Pollution	
DMD 70:	Water Quality	
DMD 71:	Protection and Enhancement of Open Space	
DMD 72:	Open Space Provision	
DMD 73:	Child Play Space	
DMD 76:	Wildlife Corridors	
	0 0''	

North Circular Area Action Plan

- 7.11 The North Circular Area Action Plan (NCAAP) sets out a planning framework for the sets out a planning framework for the future of the North Circular corridor between the A109 at Bounds Green and the A10 Great Cambridge Road. The adopted NCAAP forms an integral part of the Local Plan, sitting alongside the adopted Core Strategy (2010), the adopted New Southgate Masterplan (2010), the adopted Development Management Document (DMD, (2014), and other area based plans being prepared for Enfield's strategic growth and regeneration areas. The NCAAP provides more detailed and area-specific policy and framework for this part of the borough. New development proposals coming forward within the area are expected to accord with the policies and proposals unless other material planning considerations indicate otherwise. Of particular relevance to this application are policies NC Policies 2, 6, 8, 9 and 17 which are summarised as follows:
- 7.12 NC Policy 2 'New and Refurbished Homes' identifies 20 sites within the NCAAP area which have the potential to deliver approximately 1,400 new homes within the plan period up to 2026.
- 7.13 NC Policy 6 'High Quality Design of New Development' states that new development within the NCAAP area will be high quality and design led...taking careful account of urban context and reinforcing local distinctiveness. In relation to Arnos Grove station the policy states that the character of the area is suburban and generally low to medium density and new development will have a significant impact on townscape and as such should have a design-led approach.
- 7.14 NC Policy 8 'Transport and Movement' in the NCAAP Area notes that Arnos Grove station has commuter parking either side of the station building and these sites are identified for potential redevelopment. The policy further notes that the suitability of these sites for redevelopment will depend on their role in providing commuter parking in this location.
- 7.15 NC Policy 9 'Environmental Mitigation Air Quality and Noise Pollution' notes that in relation to air quality the design of new developments and their associated landscaping proposals can significantly help in the mitigation of environmental problems such as air and noise pollution.
- 7.16 NC Policy 17 sets out that the site has the potential to be released for redevelopment whilst also making clear that any new development would need to respect the setting of the listed building. The policy further notes that new development "should take account" of four criteria, including the site layout (Part 1) and the estimated site capacity (Part 4), but these are not absolute requirements.

Enfield Draft New Local Plan

- 7.17 Work on a New Enfield Local Plan has commenced so the Council can proactively plan for appropriate sustainable growth, in line with the Mayor of London's "good growth" agenda, up to 2041. The Enfield New Local Plan will establish the planning framework that can take the Council beyond projected levels of growth alongside key infrastructure investment.
- 7.18 The Council consulted on Enfield Towards a New Local Plan 2036 "Issues

and Options" (Regulation 18) (December 2018) in 2018/19. This document represented a direction of travel and the draft policies within it will be shaped through feedback from key stakeholders. As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough's needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.

National Planning Policy Framework (February 2019)

- 7.19 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:
 - a) an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 7.20 The NPPF recognizes 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.
- 7.21 In relation to achieving appropriate densities paragraph 122 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
 - a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;

- c) the availability and capacity of infrastructure and services both existing and proposed as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.
- 7.22 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

National Planning Practice Guidance (NPPG)

7.23 The Government published NPPG sets out further detailed guidance on the application of policies set out in the NPPF. NPPG guidance covers matters such as decision making, planning conditions and obligations, EIA, the historic and natural environment and design.

Other Material Considerations

- 7.24 The following guidance is also considered particularly relevant:
 - New Southgate Masterplan (2010)
 - Enfield Biodiversity Action Plan
 - Enfield Characterisation Study (2011)
 - Enfield S106 SPD (2016)
 - Enfield Decentralised Energy Network Technical Specification SPD (2015)
 - Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
 - The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)
 - London Councils: Air Quality and Planning Guidance (2007)
 - TfL London Cycle Design Standards (2014)
 - GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
 - GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
 - GLA: The Control of Dust and Emissions during Construction and
 - Demolition SPG (2014)
 - GLA: London Sustainable Design and Construction SPG (2014)
 - GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
 - GLA: Social Infrastructure SPG (2015)
 - GLA: Housing SPG (2016)
 - GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
 - Mayor's Transport Strategy (2018)
 - GLA Threshold Approach to Affordable Housing on Public Land (2018)
 - Healthy Streets for London (2017)
 - Manual for Streets 1 & 2, Inclusive Mobility (2005)
 - National Design Guide (2019)
 - Enfield Climate Action Plan (2020)
 - Enfield Housing and Growth Strategy (2020)

8.0 Material Planning Considerations

- 8.1 The main planning issues raised by the Proposed Development are:
 - 1. Principle of Development (Land Use) (Para. 8.2)
 - 2. Housing Need and Delivery (Para. 8.3)
 - 3. Density and Dwelling Mix (para. 8.4)
 - 4. Housing Mix (para. 8.5)
 - 5. Residential Quality and Amenity (para. 8.6)
 - 6. Design (Para. 8.7)
 - 7. Heritage (Para. 8.8)
 - 8. Neighbouring Amenity (Para. 8.9)
 - 9. Transport (Para. 8.10)
 - 10. Trees (Para. 8.11)
 - 11. Water Resources, Flood Risk and Drainage (Para. 8.12)
 - 12. Environmental Considerations (Para. 8.13)
 - 13. Waste Storage (Para. 8.14)
 - 14. Contaminated Land (Para. 8.15)
 - 15. Air Quality / Pollution (Para. 8.16)
 - 16. Socio-economics and Health (Para. 8.17)
 - 17. Education (Para. 8.18)
 - 18. Fire Safety (Para. 8.19)
 - 19. Equality (Para. 9.0)
 - 20. Community Infrastructure Levy (Para. 10.0)
 - 21. Conclusion (Para. 11.0)

8.2 Principle of Development (Land Use)

- 8.2.1 In terms of the overarching principle of development it is useful to note that the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.2.2 Running alongside this is the aim that planning should facilitate the delivery of sustainable development. This is achieved by ensuring that the right development is built on the right land; that development helps to support communities with sufficient homes, accessible services, and open spaces; and development protects and where appropriate, enhances the natural, built and historic environment.
- 8.2.3 With regards to the existing land use, it is noted that the NPPF (Para. 118) advocates the promotion and support the development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 8.2.4 Meanwhile paragraph 1.2.5 of the London Plan (Intend to Publish) notes that fall options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London'. Furthermore, Policy GG2 requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield land and delivering additional homes.

Comprehensive Redevelopment

- 8.2.5 The scheme proposes the redevelopment of the site, which comprises two existing car parks (Sites A and B). The existing car parks provide no architectural interest to the area nor do they contribute towards enhancing the Grade II* listed station and its setting.
- 8.2.6 The site is situated within the New Southgate Place shaping area and is also within the North Circular Area Action Plan Area (2014). The potential for development was set out in adopted Enfield development plan policy specifically, within the North Circular Area Action Plan (2014).
- 8.2.7 The site is identified as an 'opportunity site' within the North Circular Area Action Plan (NCAAP), within NC Policy 2 (Opportunity Site 7). NC Policy 17 also sets out that the site has potential to be released for redevelopment. The principle of development on this site is therefore supported. NC Policy 17 Arnos Grove Station states the site has potential to be released for redevelopment, and that new development would need to respect the setting of the Grade II listed station building, and that respecting the setting of the station could be achieved by setting the building line of new development back so that views from the local centre are not interrupted.
- 8.2.8 The policy provides indicative housing numbers and design options, which have been assessed in this report in the context of present-day considerations, adopted and emerging policies and other material considerations. The NCAAP pre-dates the current adopted London Plan (2016) and emerging London plan (ItP) housing targets.
- 8.2.9 This area is identified as a place shaping priority area / regeneration priority area. Core Policy 44 'North Circular Area', and Core Policy 45 'New Southgate' are relevant policy considerations. Enfield adopted Core Strategy (2010) Core Policy 44 North Circular Area states that the Council will promote housing improvements and investments. It recognises that housing estimates may need to be revised following further detailed work as part of the AAP and New Southgate Masterplan. It also indicates that new development will be expected to cross-fund environmental improvements in the area such as landscaping and tree planting. Core Policy 45 New Southgate sets out the objectives for this place shaping priority area. It indicates that a holistic integrated approach should be taken to development and that street based urban design solutions should be employed.
- 8.2.10 Whilst it is acknowledged there will be a loss of car parking the development will promote imminently important aims such as sustainable development and sustainable modes of transport, delivering housing in a location identified as an opportunity site in Enfield's adopted development plan. The potential for housing at this location has been indicated, as part of Enfield's currently adopted development plan.
- 8.2.11 The principle of the development is acceptable subject to further detailed assessment below an appropriate suite of conditions and planning obligations.
 - a) Residential Use

- 8.2.12 The benefits of delivering housing on an underutilised brownfield site in a highly accessible location (directly adjacent to a tube station), partially within and directly adjacent to a designated local centre (Arnos Grove Local Centre) has strong planning policy support and should be afforded substantial weight in the determination of the application. The site is uniquely situated directly adjacent to a tube station providing a very robust case for a car-free development.
- 8.2.13 With specific regard to the residential element of the proposal, it is noted that the NPPF sets out the government's objective to boost the supply of homes. The NPPF also states an intention to ensure that supply meets the needs of different groups in the community, including an affordable housing need. Policy GG4 of the draft London Plan supports this intention, stating that planning and development must 'ensure that more homes are delivered'.
- 8.2.14 Policy H1 of the draft London Plan (ItP) notes the importance of encouraging residential development on appropriate windfall sites, especially where they have a high PTAL rating (ratings 3 to 6) or are located within 800m of a tube station. The Council's Core Strategy (4.1 Spatial Strategy), identifies that sustainable locations for development would be concentrated in town centres, on previously developed land and that new homes will be planned through the intensification of land uses.
- 8.2.15 The Mayor's Affordable Housing and Viability SPG sets out the intention to bring forward more public land for affordable homes. Paragraph 4.4 of the SPG outlines the benefits of Build to Rent (BtR) developments noting these: attract investment into London's housing market that otherwise would not be there, particularly since Build to Rent is attractive to institutional investors seeking long-term, inflation-tracking returns; accelerate delivery on individual sites as they are less prone to 'absorption constraints' that affect the build-out rates for market sale properties; more easily deliver across the housing market cycle as they are less impacted by house price downturns; provide a more consistent and at-scale demand for off-site manufacture; offer longer-term tenancies and more certainty over long-term availability; ensure a commitment to, and investment in, place making through single ownership; and provide better management standards and higher quality homes than other parts of the private rented sector. Build to Rent is considered in greater detail below.
- 8.2.16 NPPF (Paragraphs 102 and 103) sets out objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport, and requires development be focused on locations which are sustainable and can offer a range of transport modalities to help reduce congestion and emissions and improve air quality and public health. The development site is in a highly accessible and sustainable location (directly adjacent to a tube station), immediately adjacent to an underground station with a bus interchange immediately at the front of the site.
- 8.2.17 The proposal is for 162-residential units on a site where the adopted development has identified potential to introduce new housing (NCAAP). The Boroughs housing delivery targets have been set by the GLA and the Draft London Plan states that Enfield is required to provide a minimum of 12,460 homes over the next 10 years (1,246 per annum), in comparison to the previous target of 7,976 for the period 2015-2025.

- 8.2.18 According to the Enfield Housing Trajectory Report (2019), during the previous 7-years the Borough has delivered a total of 3,710 homes which equates to around 530 homes per annum. Furthermore, given the new target of 1,246 per annum the borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs, as is the case here.
- 8.2.19 The Council is currently updating its Local Plan and through publishing the Issues & Options (Regulation 18) last year has been transparent about the sheer scale of the growth challenge for Enfield. The published Regulation 18 document was clear about the need to plan differently to attain a significant step change in delivery and secure investment in our borough. The council needs to encourage a variety of housing development including market, affordable and Build to Rent products, as is proposed here, in order to meet varied local demand.
- 8.2.20 In terms of national policy, the provision of housing on underutilised brownfield sites in highly accessible locations is in line with the NPPF principles in respect of sustainable development (social, economic and environmental). This approach is also in line with the adopted and draft London Plan's which supports the optimisation of underutilised and highly accessible brownfield sites. It is also aligned with a plan-led approach to directing density and scale to sites where new resident populations can most sustainably be supported.
- 8.2.21 In relation to sustainable development the proposal is considered to respond to the objectives of the NPPF by redeveloping a brownfield site; by providing homes that are highly accessible site (directly adjacent to a tube station) and easily accessible to local amenities; by providing a range of housing to support a mixed and balanced community; and by having due regard to the local natural, built and historic environment. It is also considered that the proposed number of residential units on the site would contribute to providing housing to assist in meeting the borough's housing target and help bridge the shortfall that has been the case in previous years.

Loss of Existing Car Park / introducing a Compatible Land Use

- 8.2.22 The loss of the existing car park (Sites A and B) is a key planning consideration in the assessment of the proposal. The proposed site adjoins a tube station and bus interchange and as such, as indicated above makes it a sustainable place to live. The applicants have carried out comprehensive surveys of the use of the existing car park and have concluded that a clear majority of drivers have alternative forms of public transport available to them. The applicants' surveys also indicate that most people live within walking distance of another London Underground station or National Rail station.
- 8.2.23 As mentioned above, in terms of national policy the provision of housing on underutilised brownfield sites in highly accessible locations and to increase densities, is a key driver within the NPPF particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively. This approach is also in line with the draft London Plan's direction of travel which is to optimise underutilised brownfield sites.

- 8.2.24 Policy H1 of The London Plan (Intend to Publish) advocates for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL rating of 3-6), and mixed-use redevelopment of car parks and public sector owned sites. This approach is also supported in the council's Issues and Options document which identifies the need to intensify development areas around key overground and underground rail stations. The document further identifies redeveloping underutilised and low-density land such as surface car parks whilst also recognising the need to 'genuinely commit to deliver sufficient new housing to address our needs', for example related to size and tenure.
- 8.2.25 Running alongside this is the high quantum of our Borough (around 40%) that is designated Green Belt, which results in specific challenges in terms of the provision of substantial development, such as the proposal under consideration here. As Policy G2 of The London Plan restricts development in the Green Belt in accordance with the NPPF, opportunities for the provision of housing are restricted which means the utilisation of inefficiently used brownfield sites becomes a priority.
- 8.2.26 The existing car parks give rise to a degree of existing amenity impacts on adjoining properties due to the incompatibility of car parking located to the rear of existing homes. These include noise, air quality and disturbance to the rear of existing homes. The proposals would introduce a compatible land use, residential, in this location beneficially reducing immediate noise, air quality and disturbance to rear of homes along Brookdale, Walker Close and Arnos Road.
- 8.2.27 Given the site is considered to be underutilised in terms of use and is in a well-connected transport node, Officers are satisfied that the loss of the existing car park has been appropriately justified in land use planning policy terms and is in accordance with the above policies.

Commercial Floorspace Provision

- 8.2.28 DMD Policy 28 notes that in relation to 'local centres' the Council will seek to protect and improve the provision of day-to-day goods and services to meet the local needs of residents in the local neighbourhood. The scheme seeks to provide an 89 sq.m commercial unit at the front of building A01, facing out onto the proposed new public square. The applicants are seeking to secure a multiple use permission for the unit in order to maximise the opportunity to find a suitable tenant. The proposed use is A1 (Shops) / A3 (Restaurants and cafes) / A4 (Drinking establishments) which is considered suitable for the site.
- 8.2.29 In consideration of the above, the loss of the existing car park is considered acceptable in this instance as the redevelopment of the Site to provide housing is aligned with existing and emerging policy and local, regional and national level. In addition, the development will provide policy compliant (40% based on habitable rooms) levels of affordable housing which will be secured by way of a Section 106 agreement. The provision of Affordable Housing is a key priority for the council and as identified elsewhere in this report, given the high levels of Green Belt in the Borough, brownfield sites such as this are needed to provide housing which the Borough is currently under-providing, particularly Affordable Housing.

Suitability of the site for Build to Rent housing

- 8.2.30 The Site is allocated as an area for regeneration and the delivery of housing in the Core Strategy and as part of the North Circular Area Action Plan. The site has potential to contribute towards the current shortfall in housing delivery within the Borough, particularly in relation to affordable housing.
- 8.2.31 The Affordable Housing and Viability SPG highlights that Build to Rent can be particularly suited to development in town centres or near transport nodes. The Application site is located at a highly accessible, and underutilised brownfield site on the edge of Arnos Grove local centre, and at a transport node.

Summary of Principle

8.2.32 Given the above considerations, the principle of development is considered to be acceptable and in line with relevant policies, most notably London Plan Policy G2, Intend to Publish Policies GG2, GG4, H1 and H11, Core Strategy Policy 4.1, DMD Policy 28, the Mayor's Affordable Housing & Viability SPG and Paragraphs 59, 102 and 105 of the NPPF. As such the Development is supported in principle terms subject to other detailed considerations as discussed below.

8.3 Housing Need and Delivery

- 8.3.1 The current London Plan sets a target for the provision of 49,000 new homes across London each year. This target is set to increase in the draft London Plan (Intend to Publish) with Policy H1 stating an overall target for the provision of 52,287 new homes each year. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.
- 8.3.2 The draft London Plan (ItP) identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the current target of 798.
- 8.3.3 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious draft London Plan targets.
- 8.3.4 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation with a significant 67% increase between 2012 and 2018.

- 8.3.5 The fourth and fifth ambitions of the strategy are in respect of Inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.
- 8.3.6 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the draft London Plan (ItP) seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 8.3.7 As mentioned elsewhere in this report, Enfield is a celebrated green borough, with close to 40% of our borough currently designated Green Belt or Metropolitan Open Land, and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. The reality of these land designations means the call on optimisation of our brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to transform.
- 8.3.8 Taking into account both the housing need of the borough together with the track record of delivery against target, it is clear that the council must seek to optimise development on brownfield sites, particularly those that are currently not being optimised.

Build to Rent

- 8.3.9 Build to Rent is supported in planning policy nationally, and regionally in London. Published London Plan (2016) Policy 3.8 provides support for Build to Rent. Draft London Plan (ItP) Policy H11 supports Build to Rent housing. The supporting text for the policy supports boroughs in taking a positive approach to Build to Rent so it can better contribute to the delivery of new affordable homes. Draft London Plan (ItP) Policy H11 sets several criteria for what can qualify as Build to Rent (see below). Policy H11 also states that affordable housing can be entirely Discounted Market Rent (DMR), where it fulfils the definition of Policy H11 (Part B). The Mayor of London's Housing and Viability SPG (2017) provides specific guidance in respect of Build to Rent, including on viability.
- 8.3.10 Adopted Enfield Local Plan policies (Core Strategy and Development Management Document) are silent on Built to Rent, which is a relatively new housing type. Key relevant strategic policies and guidance (LP 3.8, LP(ItP) H11 and Affordable Housing and Viability SPG) have been adopted, or emerged, following adoption of Enfield's Core Strategy (adopted in 2010) and the DMD (adopted in 2014).
- 8.3.11 The Council's New Local Plan Issues and Options consultation document (2019/2020) signals an intention to include a policy that support Build to Rent. While this document has limited weight Paragraph 5.6.5 of that consultation document states "The Council supports Build to Rent and will positively promote this housing product through policy making, to support the delivery of the high quality, secure homes that Enfield residents need, in accordance with the London Plan and Mayor's SPG on Affordable Housing and Viability."

Build to Rent criteria

8.3.12 All 162 of the proposed units (or 466 habitable rooms) are Build to Rent.

Table 1 below sets out the management and tenancy terms offered – against the criteria required by draft London Plan Policy H11 (ItP) – and how the proposed development would meet, and in some cases exceed, those criteria.

Table 1

Management and tenancy topic / criteria	Proposal	Commentary	Build to Rent LP (ItP) Policy H11 and AH and Viability SPG				
Management Body	Connected Living London	Homes will be held in unified ownership and will be professionally managed by CLL with daily on-site presence.	Complies with policy H11(B)(5) and H11(B)(8)				
Tenancy Type	1-5 Year AST	All tenants will be offered a tenancy of up to 5 years. This exceeds Draft London Plan requirements.	Complies and exceeds the requirements of policy H11(B)(6)				
Annual Rent Increases	Increases Formula Linked	Rent certainty will be provided to tenants for the period of their tenancy by clearly setting how annual rent increases will be calculated in the tenancy agreement.	Complies with policy H11(B)(7)				
Letting Fees	None	No upfront letting fees will be charged to tenants. Deposits will be held securely in an appropriate Deposit Protection Scheme.	Complies with policy H11(B)(10)				
Service Charges	None	All rents will be inclusive of service charges.	Complies with policy H11(B)(7) and DMR/LLR requirements				
Covenant Length	15 Years	The private homes will be required to be retained in rental use for 15 years. Affordable housing in perpetuity.	Complies with policies H11(A) and H11(B)(2)				
Covenant Clawback	Clawback Mechanism	A clawback mechanism will ensure there is no financial incentive to break the covenant. The mechanism will follow the Formula set out in the GLA's Affordable Housing SPG (2017).	Complies with policy H11(B)(3)				
Housing numbers and containment	162 self- contained homes	162 self-contained homes (466 rooms) with all units self-contained and let separately.	Complies with policy H11(B)(1) and H11(B)(4)				
Tenant Break	1 Months' Notice (After 6 Months)	A tenant only break will allow tenants to end the tenancy with a months' notice after 6 months.	Complies with SPG management standards (5)				

- 8.3.13 The proposal complies with draft London Plan (ItP) Policy H11(A) and the 11 parts of London Plan (ItP) Policy H11(B).
- 8.3.14 Housing quality is another important criterion in considering a Build to Rent scheme. The Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG sets out design quality criteria (Part 4) in respect of Build to Rent schemes (the SPG sets five key principles for assessing a Build to Rent scheme). The SPG highlights the importance of achieving good quality development to support high quality Build to Rent developments. A detailed assessment of the design element of the scheme is set out below.

Summary of Build to Rent

- 8.3.15 The proposed development would support Ambitions 1, 3, 4 and 5 of Enfield's 'Housing and Growth Strategy' (2020), endorsed by Council's cabinet (January 2020) and agreed at Enfield Council meeting (February 2020). The scheme is aligned with Ambition 3 of the strategy increasing the quality and affordability of private rented sector housing through development of a Build to Rent scheme with housing products offered at a range of rental levels. Build to Rent housing addresses an identified need for higher quality more secure private housing locally.
- 8.3.16 The housing will provide good quality housing and be available on long-term tenancies (up to five years proposed) increasing security and stability. Of the 162 units, 40% (64) will be Affordable Housing and the remaining units will be rented at competitive market rates. All of the proposed units would comply with relevant Build to Rent qualifying criteria which will be secured in the s106 legal agreement where necessary. Subject to conditions and s106 planning obligations, the proposal is considered to accord with draft London Plan (ItP) Policy H11 and Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG criteria and relevant guidance on Build to Rent schemes and would provide high-quality new homes.

Affordable Housing

- 8.3.17 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The Revised NPPF identifies Build to Rent as purpose-built housing that is typically 100% rented out. Annex 2 of the Revised NPPF (February 2019) defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision. London Plan Policy H5 (ItP) sets out a strategic target for 50% of all new homes delivered across London to be affordable.
- 8.3.18 Enfield sets a borough-wide affordable housing target of 40% (Council's Core Strategy Policy 3). The Council will agree an appropriate figure, taking into consideration site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.
- 8.3.19 Development Management Document Policy DMD 1 (Affordable Housing) is silent on Build to Rent schemes. DMD 1 supporting text notes that affordable

housing comprises three tenures: social rent, affordable rent, and intermediate housing. Enfield's Development Management Document Policy DMD 1 (Affordable Housing) states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need. Less than 1% of housing in the local area (Southgate Green ward) is intermediate housing.

8.3.20 In this context, London Plan Policy (adopted Policy 3.8 and emerging Policy H11) and the Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG (2017) have substantial weight in respect of the assessment of build to rent schemes, and assessment of discounted market rent products as affordable housing.

Affordable housing delivery in Enfield

8.3.21 In 2016/17, 30% of housing completions were affordable, whilst in 2017/18 this decreased to 7% of housing completions being affordable, amounting to 37 units in total being delivered. These figures show that the target 40% affordable housing delivery is not currently being met in the Borough. The Housing and Growth Strategy (2020) sets out an ambition to increase the target of 50% of new homes to be affordable housing in the next Local Plan. Enfield's Housing and Growth Strategy (2020) states the Borough's ambition to develop more homes that are genuinely affordable to local people, so more people can live in a home where they spend a more reasonable proportion of their household income on housing costs.

Assessment: Maximising affordable housing

- 8.3.22 The Applicant has submitted an 'open book' Viability Appraisal which was scrutinised by the Council's independent viability consultants. The Council's independent viability consultants concluded the scheme cannot support more than 40% affordable housing, based on the tenure mix agreed and the specific nature of the site. The Council's independent viability consultants concluded the scheme is unviable by £1.17m. The Mayor of London's Housing and Viability SPG (2017) provides specific guidance on viability issues associated with Build to Rent. It notes the specific development economics associated with this type of affordable housing.
- 8.3.23 The Site forms part of a portfolio of sites across London owned by TfL and brought forward by 'Connected Living London' to support the Mayor of London's ambition of increasing the proportion of affordable new homes in the capital. The portfolio seeks to deliver 50% Affordable Housing averaged across the whole portfolio city-wide (delivering aa minimum of 10,000 homes across London).
- 8.3.24 The Proposed Development under consideration here will provide 40% affordable housing based on habitable rooms. The 'portfolio' approach is accepted by Local Planning Authorities across London with the 50% strategic target achieved at a pan-London level in accordance with London Plan (ItP) Policy H5. Officers consider that, subject to early and late stage viability reviews, that the 40% Affordable Housing offer is in line with London Plan (ItP) requirements. Officers accept the Build to Rent 'portfolio agreement' justification in this case.

- 8.3.25 Scheme layout, scale and density have been informed by site-specific constraints and challenges of this site with viability implications. Arnos Grove Station is a Grade II* listed building of unique importance in Enfield. It is one of the most highly regarded examples of Charles Holden's designs. Scheme design has been heritage-led, informing building layout, envelop and height and scale. Officers have also assessed that the scheme does not exceed the 'yardstick' density matrix parameters for this type of site. The design and heritage aspects of the scheme have been assessed below but in summary Officers consider the scheme design, including its scale and density, represent a sympathetic response within the setting of an important designated heritage asset positively preserving and enhancing it. This has viability implications.
- 8.3.26` Officers have assessed the scheme delivers the maximum reasonable amount of affordable housing in accordance with London Plan (2016) Policy 3.12, London Plan Policy H5 (ItP). Affordable housing negotiations are in line with London Plan (2016) Policy 3.12 and H5 (ItP) Enfield Core Strategy Policy 3 and DMD1 requirements that negotiations consider the specific nature of the site, development viability and the need to achieve more balanced housing supply (see below).
 - Assessment: Tenure and identified housing need (Enfield and Southgate Green)
- 8.3.27 Locally within Southgate Ward, Office for National Statistics (ONS) data (household composition by tenure data current at October 2020) indicates the area surrounding the application site is primarily owner-occupied housing (private) or private rented housing. Less than 1% of housing in the local area is intermediate housing. Overall housing composition in the local area is 88% owner-occupied, private rented or living rent free. Approximately 12% of housing composition is social rented.
- 8.3.28 The data shows a lack of affordable housing tenures in Southgate Green ward. Housing mix is considered below, but in summary ONS data also shows the local area has a relatively high proportion of 3-Bed (or more) family houses, typically with a front door and garden showing a lack of smaller affordable homes to support housing choice and a socially sustainable and balanced housing supply.
- 8.3.29 In Enfield, approximately 56,000 local households do not qualify for social rent and are unable to afford to purchase a home privately relying on private rent housing. Build to Rent is more affordable and flexible than other private rented stock, providing quality and security. As many of these residents will not have priority for social housing and cannot afford to buy property, the provision of good quality, secure and affordable rental homes is necessary. Intermediate housing addresses this need.
- 8.3.30 Less than 1% of housing in Southgate Green ward is intermediate housing, and this percentage is also reflected across the Borough where intermediate housing stock represents a relatively low proportion also 1%.
- 8.3.31 The tenure mix within the affordable housing is in line with adopted and draft London Plan policy. Officers have assessed that the proposed affordable tenures will address a demonstrated local need for proposed affordable housing, which would address the need for an underrepresented affordable

housing product within the Southgate Green ward, and across Enfield. It would introduce an appropriate form of affordable housing, within the Southgate Green ward, supported in London Plan policy and guidance (adopted and draft) providing a more balanced housing supply – in an area characterised by a lack of affordable homes generally, including smaller affordable homes and intermediate affordable housing.

Assessment: Affordability

- 8.3.32 Objections have been received raising concerns that the affordable housing will not be affordable to Enfield households. These include concerns that 85% of households in the Borough earn less than £60,000 and so would be unable to afford the affordable rents. Objections also reference the unaffordability of the proposed affordable housing relative to 'median household income in Enfield of just £34,000, while the average salaries of key workers in London is just £27,000'.
- 8.3.33 The Applicant's offer and relevant policy and guidance are summarised below:
 - The costs for all intermediate rented products (including London Living Rent, Discounted Market Rent) should be affordable to households on incomes of £60,000 or less.
 - For dwellings to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of a household's net income.
 - London Living Rent should be genuinely affordable with rents no greater than 40% of net household income.
 - subject to the GLA's household income cap in place at the time of letting.
 - An Intermediate product should be no greater than 70%-80% of market rent and no greater than 40% of net household income.
- 8.3.34 Affordability relative to income: The Draft London Plan (ItP) states that all intermediate rent products should be affordable to households on incomes of up to £60,000. £60,000 household income is a cap, not an average or minimum. In comparison, Shared Ownership housing, has a higher cap of £90,000. Enfield Council supports Shared Ownership housing as an acceptable intermediate affordable housing product. When assessed relative to income Discounted Market Rent provides a more affordable and flexible housing product.
- 8.3.35 Within the immediate locality, data from Enfield Council's Knowledge and Insight Hub (2020) indicates Southgate Green ward has the 4th highest average (median) household income of the 21 wards in Enfield. Average household income in the ward is above the median level for the borough as a whole and higher than the London average. Based on this evidence, officers have assessed that the Discounted Market Rent homes would make a meaningful contribution towards the supply of affordable housing within Southgate Green ward, having regard to the relevant policy and guidance tests.

- 8.3.36 Affordability relative to market rent. When considered in respect of Enfieldwide affordability the supporting text to Enfield's adopted DMD 1 policy is relevant. While the policy is silent on Build to Rent and Discounted Market Rent, supporting text comments on rent affordability are relevant (para 2.1.4). It states 'Evidence shows that larger units at rent levels of 80% of market rent will be unaffordable to most families. For residents earning the median borough income, 78% of market rent for 2 bed units, 60% of market rent for 3 bed units and 49% of market rent for 4+ bed units would be affordable'.
- 8.3.38 70% of the affordable homes at Arnos Grove are proposed as Discounted Market Rent (1- and 2-bedroom homes set at 70% of market rent). The 2-bed units discount of 70% represents a larger discount (more affordable) than the 78% of market rent for 2 bed units described as affordable in the DMD to 'residents earning the median borough income'. In respect of the 3- bedroom Discounted Market Rent homes, these are offered at a discount of 65% of market rent. While this is 5% above 60% of rent for 3-bed units described in the DMD Officers have balanced this against the benefit of the greater discount offered for 2-bed units, including larger 2-bed units. Officers have also agreed early and late stage reviews, that have potential to direct any surplus to further improve the level of discount for 3-bed DMR units or increase the % of DMR LLR 3-bed units.
- 8.3.39 London Living Rent is the Mayor of London's preferred Discounted Market Rent and is set by the GLA, on a ward by ward basis. 30% of the affordable homes at Arnos Grove are proposed at rent levels equivalent to London Living Rent for the Southgate Green ward where the site is located. Officers are satisfied these units represent genuinely affordable rent units particularly in respect of Southgate Green ward.

Summary of Affordable Housing

8.3.40 The proposed Affordable Housing offer of 40% is based on habitable rooms which equates to approximately 39.5% of overall units. In terms of unit numbers this results in 64 of the proposed 162 units being Affordable. Tenure mix is set out below.

Tenure	1b2p	2b3p	2b4p	3b5p	
Market Rent	44	3	51	0	98
Discounted Market Rent	28	3	4	10	45
DRM at LLR Levels	12	2	1	4	19
Subtotals	84	8	56	14	162

- 8.3.41 Officers have assessed the scheme in accordance with London Plan (2016) Policies 3.10, 3.11 and 3.12, London Plan Policies (ItP) H5 and H11. Affordable housing negotiations are in line with London Plan (2016) Policy 3.12 and H5 (ItP) Enfield Core Strategy Policy 3 and DMD1 requirements that negotiations take into account the specific nature of the site, development viability and the need to achieve more balanced housing supply (see above and below).
- 8.3.42 The scheme is a Build to Rent scheme. London Plan (ItP) Policy H11 states that where housing is accepted by a Local Planning Authority as Build to Rent

(see assessment above) – affordable housing can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably at London Living Rent level. Enfield's adopted policies, including Development Management Document Policy DMD 1 (Affordable Housing) are silent on Build to Rent schemes. DMD 1 is also silent on preferred Discounted Market Rent levels and London Living Rent as preferred affordable housing products for Build to Rent schemes.

- 8.3.43 Officers have assessed that the affordable housing offer, including overall % and tenure represents the maximum reasonable amount of affordable housing deliverable considering the specific context and character of the site and details of the scheme. Negotiations have taken account of the site's individual circumstances, in accordance with adopted London Plan Policy 3.12(B), emerging London Plan Policy H5 (ItP) and Enfield DMD1 policy in respect of affordable housing negotiations. This has included consideration of the provision for re-appraising the viability of the scheme prior to implementation (early and late stage viability reviews agreed) and other scheme requirements.
- 8.3.44 One of the key specific considerations (site and scheme) has been the critical need to preserve the setting of the Grade II* listed Arnos Grove station and ensure any scheme represents a proportionate and sympathetic response in the context of designated heritage asset / listed building and other non-designated heritage assets in the locality.
- 8.3.45 The details of the Affordable Housing offer will be captured via way of planning obligations. The Section 106 agreement will also contain review mechanisms (early and late), which will enable the Council to capture any uplift in value afforded to the site after planning permission has been granted.

8.4 Density

- 8.4.1 Objections have been received that the proposals would result in overdevelopment and excessive density within the Arnos Grove area. Officers have assessed the density of the scheme and concluded that it is in line with adopted local and regional (London) density guidance. This is in addition to the applicant following a design-led response, in accordance with the preferred and emerging London Plan (ItP) approach to optimising site capacity.
- 8.4.2 NPPF paragraph 122 states that in respect of development density, consideration should be given to whether a place is well designed and 'the desirability of maintaining an area's prevailing character and setting...or of promoting regeneration and change'. Adopted London Plan Policy 3.4 requires development 'optimise' housing output taking account of public transport accessibility, local context and character and design principles. It includes Table 3.2 Sustainable residential quality (SRQ) matrix providing an indication of appropriate densities in an urban location. Policy 3.4 makes clear that the matrix should not be applied mechanistically. The site has a forecast PTAL of 4/6. Taking account of the Local Centre designation of part of the site, Arnos Grove underground station and bus interchange context the site has an Urban Character. For such sites, the current density matrix provides an indicative density of 200-700 habitable rooms per hectare (hr/ha) or 70 to 260 units per hectare (u/ha), for schemes with 2.7-3.0hr/unit.

- 8.4.3 Policy H10 of the London Plan (ItP) promotes higher density development in locations with a good PTAL score and in close proximity to a local centre in order to ensure the most efficient use of land and to optimise the provision of housing. The London Plan (ItP) incorporates a different approach to assessing density advocating a design-led approach. London Plan policy D3 (ItP) does not follow a matrix approach providing indicative densities. It instead advocates for the best use of land by following a design-led approach that optimises the capacity of sites. This determines the most appropriate form of development, responding to a site's context and capacity for growth and existing and planned supporting infrastructure capacity (as set out in Policy D2).
- 8.4.4 Local Plan Core Policies 4 and 30 stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Local Plan Policy DMD 37 calls for a design-led approach to 'capitalising' on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity. Policy DMD8 requires proposals be in an appropriate location and of a suitable scale, bulk and massing.
- 8.4.5 Enfield Policy DMD6 promotes density appropriate to the locality in line with the Published London Plan Policy 3.4 density matrix. Policy DMD8 which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing. In this instance the Proposed Development is located in a highly accessible location with a PTAL rating of 4 to 6a, at Arnos Grove underground station and a bus interchange at the front of the station. Enfield Issues and Options (Regulation 18) document (Para. 2.4.1), acknowledges the need to 'exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities with this aim being a 'first principle' of the document.
- 8.4.6 Published London Plan Policy 3.4 (Table 3.2) ((Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)) of the current London Plan sets out guidance for appropriate density in an urban location. The guidance suggests that 70-260u/ha is appropriate in areas with a good PTAL and with an average of 2.7-3.0hr/unit. The proposed density of 143.3u/ha is in line with the density matrix and therefore the density expectations of adopted Enfield DMD Policy 6. While Officers do not consider the site should be assessed as 'suburban' or solely in respect of the density matrix, the proposed hr density (368.1 hr/ha) would also fall within the range for a PTAL 4-6 suburban site.
- 8.4.7 In summary, the scheme does not exceed Enfield adopted DMD Policy 6 expectations in respect of scheme density (u/ha for an urban or suburban site). Officers note, that Enfield DMD Policies on density reference adopted London Plan policies which would be replaced by the new draft London Plan (ItP) approach which removes the density matrix in preference of a design-led approach.
- 8.4.8 Officers have assessed that the proposed scheme is aligned with the density expectations for the site, under both sets of London Plan policies the matrix-based Published London Plan Policy 3.4 and design-led London Plan (ItP) Policies D2 and D3. The scheme does not exceed 350u/ha, which is the definition of 'higher density' development in the London Plan (ItP). This

- means it falls below the density threshold set for increased scrutiny of design quality set in London Plan (ItP) Policy D4 (Part D and E).
- 8.4.9 The applicant has nevertheless still pursued a process of extensive design scrutiny, including two Independent design review panel meetings. Enfield's Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context. The scheme is a high-quality well considered architectural response on a complex and challenging site. It proposes significant enhancements, which will benefit future and existing residents including public realm enhancements.
- 8.4.10 The scheme, when assessed against adopted and emerging density policy, would not result in overdevelopment or excessive density. The scheme would result in a high-quality design, and well considered architecture and approach to the public realm, providing 162 residential units across the site. When considering the proposed density in the round alongside the site's good PTAL rating, its acceptable impact on residential amenity and its sufficient social infrastructure, it is considered that the scheme results in an appropriate level of development for the site. Further, the quantum of units proposed is acceptable in its specific local setting, subject to all other material planning considerations being met. In density terms the proposed development is in line with existing and emerging policy both at local and regional level.

8.5 Housing mix

- 8.5.1 Officers have sought to maximise affordable family housing in the scheme. All family housing (3-bed/5-person) within the scheme (21.88% of the affordable homes) are offered as affordable (4 x LLR and 10 x DMR of 65%). Officers have secured early and late stage viability reviews, with any surplus recommended to be directed towards improving the affordability of family housing, through lower % DMR for 3-beds; increased numbers of DMR at LLR level 3-beds. There are no private 3-bed/5-person homes proposed in the scheme, all family homes are affordable.
- 8.5.2 The remainder of the scheme responds to local demand for 1 and 2-bed units in line with predicted smaller household sizes and to provide a wider mix of unit sizes than is currently evident in the Ward.
- 8.5.3 The units will be located within the blocks as follows:

Table 4: Buildings and Tenures

Building and	Unit Size														
Tenure	1B2P		1B2P (WC)		2B3P		2B3P (WC)		2B4P		2B4P (WC)		3B5P		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%		%	
A01 Private	17	22%	3	50%	0	0%	0	0%	11	21%	3	100%		0%	34
A02 Affordable	38	49%	2	33%	0	0%	5	63%	5	9%	0	0%	14	100%	64
A02 Private	0	0%		0%	0	0%	0	0%	2	4%	0	0%		0%	2
B01 Private	4	5%	1	17%	0	0%	1	13%	10	19%	0	0%		0%	16
B02 Private	19	24%		0%	0	0%	2	25%	25	47%	0	0%		0%	46
Total	78		6		0		8		53		3		14		

- 8.5.4 The Affordable Housing and Viability SPG highlights that in respect of Build to Rent schemes that local policies requiring a range of unit sizes should be applied flexibly to Build to Rent schemes in preferable Build to Rent locations to reflect demand for new rental stock, which is much greater for one and two beds than in owner-occupied or social/ affordable rented sector. The SPG notes that Build to Rent can be particularly suited to development on the edge of town centres or near transport nodes. In addition, LPAs should take account of the distinct economics of Build to Rent, where potential yields and investment risk can be affected by increases in the number of large units within a scheme.
- 8.5.5 The Council's Core Strategy Policy 5 and Development Management Document Policy DMD 3 set out housing mix need however, the Council's Strategic Housing Market Assessment (SHMA) which post-dates these policies illustrates an annualised requirement, between 2016-2041, for new homes to be 55% 1-bedroom, 16% 2-bedroom and 14% 3-bedroom. Officers have also considered the existing high proportion of existing 3+bed family houses in Southgate Green ward and GLA Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children.
- 8.5.6 The proposed homes would provide greater choice for people wishing to live in the area who are not part of a larger household. Developments in highly public transport accessible locations and close to facilities are also more suitable for smaller units where car ownership and use is lower which in turn supports the car-free approach proposed for the scheme. All of the units in the development, including larger size units have appropriate private amenity spaces.
- 8.5.7 In light of the above, the proposed housing mix it is considered appropriate, having regard to the Build to Rent typology and specific site characteristics and location. London Plan (ItP) Policy H10 notes that well-designed one- and two- bedroom units in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.

8.6 Residential Quality and Amenity

- 8.6.1 The NPPF (Para.12) identifies good design as a key aspect of sustainable development, stating that 'the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve'. The guidance states that developments should seek to:
 - Function well and add to the overall quality of the area for the lifetime of the development;
 - Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Be sympathetic to local character and history:
 - Establish a strong sense of place and welcoming and distinctive places;
 and
 - Optimise the potential of the site to provide an appropriate mix and amount of development, green and public space, local facilities and transport networks;

- Create safe, inclusive and accessible spaces with a high standard of amenity and where crime or fear of crime does not undermine community cohesion or quality of life.
- 8.6.2 Meanwhile Policy D6 of the London Plan (Intend to Publish), sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space. The Policy notes that design must not be detrimental to the amenity of surrounding housing. Table 3.1 sets out the internal minimum space standards for new developments and Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments.
- 8.6.3 Policies D5 and D7 of the London Plan (Intend to Publish) set out that new developments are required to support mixed and inclusive communities, which includes provision for wheelchair accessible and wheelchair adaptable units, as well as an environment that is welcoming and accessible by all.

Accessible Housing

8.6.4 Policy D7 of the London Plan (Intend to Publish) sets out that in order to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that: i) at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The Proposed Development meets relevant criteria in relation to accessible housing and is considered acceptable in this respect.

Housing quality

- 8.6.5 The Site has specific constraints in terms of access (including the bus interchange at the front), topography (including significant level drops) and tree Root Protection Areas. These site-specific constraints have influenced the percentage of dual aspect units, particularly when compared to the buildings on Site B. The housing proposed within Site A is characterised by other amenity benefits, including well-proportioned and sized family 3-bed homes. Site A is also closest to proposed on-site doorstep provision as well as other play spaces within the local area. Site A housing blocks also include internal communal amenity and concierge. All units in the development, across Sites A and B, meet London Plan (ItP) requirement levels of allocated private amenity space.
- 8.6.5 All of the units either meet or exceed internal floorspace standards required by Table 3.1 of the London Plan (ItP) and comply with the qualitative design aspects to be addressed in housing developments required by Table 3.2 (ItP). All units would meet residential space standards and would include sufficient private outdoor amenity space. The community spaces also include a range of external amenity opportunities. All ground floor units have defensible space at the front where they front onto more public areas.
- 8.6.6 The Proposed Development would comprise 74% of dual aspect units, with no north facing single aspect units. Within the constraints of the site this is considered to represent a high-quality response. Significantly, all proposed

- family housing (offered as affordable homes) will be dual aspect, as will all 2bed homes.
- 8.6.7 Some floors within Site A buildings have up to 10-units per core, which is above the 8-units per core set out in Policy D6 of the London Plan (ItP). The Mayor of London's Affordable Housing and Viability SPG notes that when assessing Build to Rent schemes in respect of design that LPAs are encouraged to take into account the value of on-site management and purpose-built design in dealing with some of the challenges that would otherwise arise were it a build for sale scheme. For example, this may allow flexibility such as on the number of homes per core per floor, and number of single-aspect homes. The core would have good natural light penetration in the lift area and Officers have assessed that the scheme provides a good response, within the constraints of the site.

Daylight/sunlight future occupiers

- 8.6.8 The submitted Daylight/Sunlight assessment includes an analysis of whether the Proposed Development will receive adequate daylight/sunlight in the units and in public and communal amenity areas.
- 8.6.9 The assessment of proposed habitable rooms for Average Daylight Factor (ADF), No-Sky Line (NSL) and Room Depth Criterion (RDC) indicate that overall, 94% and 95% of all proposed rooms meet or exceed the suggested minimum levels for ADF and NSL respectively. In addition, all rooms have been designed to meet the RDC where this applies, i.e. in rooms with a single aspect. Officers have assessed this also represents a very good performance in respect of daylight particularly within the constraints of the site and scheme characteristics.
- 8.6.10 In relation to sunlight, BRE's guidelines state that sunlight is mostly required in living spaces with the greatest expectation of sunlight within south facing rooms. Living areas with a window facing within 90 degrees of due south were assessed for sunlight availability both annually (Annual Probable Sunlight Hours (APSH) and in winter (Winter Probable Sunlight Hours (WPSH). The assessment showed that overall, 89% of the assessed living spaces are expected to meet or exceed the recommendation annually (APSH) with 94% doing so during the winter months (WPSH). Officers have assessed this also represents a good level of performance for a scheme, with limited opportunities for units to be directly orientated south, due to the site's geometry.
- 8.6.11 The daylight and sunlight results are discussed in more detail, per building as below:

Building A01

- 8.6.12 The technical assessments undertaken for Building A01 indicate there will be excellent levels of daylight and sunlight, with all 82 rooms meeting or exceeding the recommended levels of ADF and all assessed living spaces receiving levels of sunlight in line with BRE's recommendations both annually and during the winter months.
- 8.6.13 With regard to sky visibility, all but eight rooms fall short of the recommended level of NSL. The eight rooms that do not meet the recommended level of

NSL are bedrooms. However, these rooms will still receive levels of ADF well above guidance recommendations and as such will be adequately daylit.

Building A02

- 8.6.14 The technical assessments undertaken for Building A02 indicate there will be excellent levels of indoor daylight, with all 172 rooms meeting or exceeding the recommendations for ADF. With regards to NSL three bedrooms will not meet the recommended level of NSL however these bedrooms will exceed the suggested level of ADF and will therefore be expected to will receive adequate indoor daylight.
- 8.6.15 With regards to sunlight, the assessment showed that 41 of the 48 living spaces would either meet or exceed the recommended levels of sunlight both annually and during winter. The seven living spaces that would not meet the recommended level of sunlight would have balconies acting as shading devices i.e. intercepting the sun rays before they reach the fenestration. However, this is not an uncommon scenario and notwithstanding future occupants would still be able to enjoy sunlight from their balconies.

Building B01

- 8.6.16 The assessments undertaken for Building B01 indicate that good levels of daylight overall would be expected. Thirty-seven (73%) of the fifty-one rooms tested would either meet or exceed the recommended level of ADF and all but one would meet NSL requirements.
- 8.6.17 Fourteen rooms would not meet recommended guidelines for ADF, and these are as follows:
 - 9 are open-plan Living/Kitchen/Diners which see lower daylight levels than that recommended for rooms including a kitchen
 - 4 of these would have double-aspect long layouts in which the kitchen would be located at one end of the room and the living room in the other less obstructed end with considerably bigger window sizes
 - These areas would still meet the ADF criteria for living rooms, and future occupants would be expected to receive good levels of daylight from within the living space of the room
 - 5 remaining areas kitchen/dining areas with an adjoining living room would be very well daylit, and future occupants would be expected to receive very good levels of daylight
 - 5 remaining rooms are all secondary bedrooms and would be expected to receive good levels of daylight
- 8.6.18 With regards to sunlight, all assessed living areas in building B01 would be expected to meet BRE's recommendations both annually and during the winter months resulting in excellent levels of sunlight.

Building B02

8.6.19 The technical assessments undertaken for Building B02 indicate that 112 (92%) out of 122 habitable rooms would be expected to meet or exceed BRE's recommended ADF levels, and 111 rooms (91%) would be expected to meet requirements for NSL.

- 8.6.20 Ten rooms would not meet recommended ADF levels. Out of these ten rooms, five would be generously sized Living/Kitchen/Diners. One Living/Kitchen/Diner would meet the recommended level for living areas and as such would be considered adequately daylit.
- 8.6.21 The remaining four Living/Kitchen/Diners would be expected to achieve levels of ADF of 1-1.1% owing to the presence of the balcony in front of the window. As mentioned for Building A02, this is not an uncommon scenario in urban environments and is considered acceptable in this context.
- 8.6.22 Five remaining rooms which would not meet recommended ADF levels are secondary bedrooms located in the inner corners of the scheme, where the daylight is generally lower in any event.
- 8.6.23 With regard to sunlight, seven living areas do not meet BRE's recommendations both annually and during the winter months. However, the seven failing rooms meet the recommended target during the winter months, when the sun is lower in the sky and the sun rays are not intercepted by the balconies. Furthermore, for this building future occupants will receive sunlight from their balconies especially during the summer months. Given the urban context of the location, this digression is considered acceptable in this particular instance.

Overshadowing - Public and Communal Amenity Areas

- 8.6.24 In relation to overshadowing of communal amenity areas within the Site, both public and communal areas were tested, and it was found that all proposed areas exceed the suggested (BRE guideline) target on 21st March. This means that the public and communal amenity areas will experience very good/ excellent levels of sunlight.
- 8.6.25 Furthermore, a sunlight exposure analysis of these areas indicates that during the summer months, when the areas are more likely to be utilised for open air activities, the majority of the space receives in excess of six hours of direct sunlight.
- 8.6.26 Given the above the assessment concludes that future occupants of the Development will experience very good/ excellent levels of sunlight from the open spaces proposed within the site.
- 8.6.27 Overall, the expected level of amenity for future occupiers of the Site, as outlined above, is considered acceptable.

Child Playspace and Recreation Space

- 8.6.28 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation noting the provision of play space should integrate with the public realm without compromising the amenity needs/enjoyment of other residents and encourage children to play.
- 8.6.29 The Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG sets a benchmark of 10 sq.m. of useable children's playspace to be provided per child, with particular emphasis on playspace for children under five years old to be provided on-site. Meanwhile London Plan (Intend to Publish) Policy

S4 also recommends that at least 10 sq.m of playspace per child should be provided. In comparison Council Policy DMD 73 does not specify a specific amount of space per child, it sets out that developments with an estimated child occupancy of ten or more children will be required to incorporate on-site play provision to meet the needs arising from the development.

8.6.30 The GLA population yield calculator has been used to estimate the possible number of children that could live at the Proposed Development as around No.26. In terms of ages these are expected to be as follows:

Under 5's: 14.4 Age 5-11: 9.4 Age 12+: 2.9

In terms of playspace provision, the following is required and proposed:

Under 5's:

Required: 10 sq.m per child (144 sq.m in total)

Proposed: 158 sq.m of doorstep play + 150 sq.m of incidental play

Age 5-11:

Required: 10 sq.m per child (94 sq.m in total)

Proposed: 120 sq.m

Age 12+:

Required: 10 sq.m per child (29 sq.m in total)

Proposed: No on-site play. Playspace will be provided at Arnos Park

which is within the 800m distance permitted for playspace

located outside of the site.

- 8.6.31 The above figures show that playspace provision will exceed GLA requirements. In addition, given the close proximity of Arnos Park and the existing good quality of the space at the Park, this is considered an acceptable off-site location to provide playspace for the estimated 2.9 children aged 12+ who may live at the future Development.
- 8.6.32 Playspace for children aged 5+ will be concentrated around Block A02 which also houses the larger family size units whilst doorstop and incidental playspace will be spread across Sites A and B.

Landscape and Amenity Space

- 8.6.33 With regards to landscape provision on the site and residential amenity space, each unit will have a private balcony that meets required size standards as stated in the London Plan (Intend to Publish).
- 8.6.34 The proposed external amenity space will total 3,230 sq.m and will include areas accessible to the public including the public square and will also include private shared amenity providing spaces for occupiers of the development. The private areas will be in line with Healthy Street objectives which seek to prioritise people over vehicles. This will be provided by enclosed by vegetation and planting which will be selected to increase the ecological connectivity with the adjoining SINC and Wildlife Corridor.

8.6.35 The above assessment shows that there will be an over provision of playspace for children up to the age of 12 and close proximity of a good quality public park for children aged over-12. Furthermore, the application demonstrates that there will be generous landscape and amenity space. The amenity space will include both private amenity space to each unit and shared, private amenity space for use by residents. The external amenity space will also include areas accessible to the public including the public square. Taking all of the above into consideration the Proposed Development is considered acceptable in terms of playspace, amenity space and landscape provision.

Summary of Residential Quality and Amenity

- 8.6.36 The National Design Guide (Para. 63) sets out that 'Compact forms of development bring people together to support local public transport, facilities and local services.' Para. 64 further notes that 'Well-designed new development makes efficient use of land with an amount and mix of development and open space that optimises density', further noting that (it) also 'relates well to and enhances the existing character and context.' The National Design Guide further notes that groupings of buildings, spaces, uses or activities create a sense of place, promoting inclusion and cohesion.
- 8.6.37 The layout and massing of the Development has evolved in order to optimise the site's capacity, as in required in policy terms for brownfield land sites in highly sustainable locations. All proposed units will either meet or exceed internal space standards and each unit will have private external amenity space with a minimum of 5 sq.m for 1-2 person dwellings with an additional 1 sq.m per additional occupant. The development has been designed to be tenure blind, with no distinction in terms of quality between private and affordable units.
- 8.6.38 Whilst some levels of buildings on Site A exceed the recommended number of units per core of 8 (London Housing SPG), the nature of a Build to Rent development means it will be highly managed and have an active concierge, controlled access, two lifts per core and with natural ventilation and daylight within the corridors.
- 8.6.39 The proposed units have been designed in accordance with required policy standards including Enfield Policy DMD 8, London Plan Policy 3.5 and emerging London Plan (Intend to Publish) Policy D6, and represent a good quality development, with good levels of residential amenity. Whilst there are some exceptions to the compliance of the proposals, such as some single aspect units, Officers consider these are outweighed by the overall quality of the accommodation, including high levels of good quality outdoor amenity space, as well as the benefits delivered in terms of housing delivery and other benefits of the scheme.

8.7 Design

8.7.1 Heritage and character have been proactively considered and influenced the high-quality design and placemaking benefits of the proposal. The proposal has been subject to extensive pre-application engagement, an independent design review process and public consultation.

- 8.7.2 Historic England have raised no concerns about the Proposed Development. The Enfield Society, Enfield Conservation Officers, the Conservation Advisory Committee and the Greater London Authority are supportive of the heritage merits of the scheme. Enfield's Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context.
- 8.7.3 The scheme is a high-quality well considered architectural response on a complex and challenging site. It proposes significant enhancements, which will benefit future and existing residents including public realm enhancements.
 - Layout and introduction of non-residential uses and frontages
- 8.7.4 Scheme layout has been informed by key considerations, including the critical need to preserve the setting of the Grade II* listed Arnos Grove station, and minimise mature tree loss. The layout has considered constraints including the locally listed Arnos Park, which also lies within Metropolitan Open Land and the Grade II* listed station and associated assets such as the car park wall and lampposts.
- 8.7.5 The proposal incorporates new public realm at the front of the site which is a scheme benefit, improving the setting of the listed Arnos Grove station building. Officers consider this represents an improvement over the existing situation.
- 8.7.6 Representations have been received raising concerns about security, including concerns from those who currently drive and park near the station because they may feel vulnerable walking on the streets rather than driving to the station. One of the primary aims of the Mayor of London (Mayor's Transport Strategy) approach, reducing car-reliance and encouraging non-car travel, is to promote feelings of safety and security increasing activity, including pedestrian footfall.
- 8.7.7 Scheme layout, uses and active frontages are considered to successfully respond to policy objectives set out at Enfield's Core Strategy (2010) Core Policy 45 (New Southgate) in respect of place shaping within this priority area. Taking a holistic and integrated approach to development, including street based urban design solutions such as the delivery of a new square.
- 8.7.8 The proposal would introduce an active frontage, including a non-residential unit / frontage within the ground floor of Building A01 fronting onto the new square. A concierge / resident's lounge / gym area are also proposed along this frontage. These uses would also and as such will be expected to have a higher level of activity than the other buildings. Officers have assessed that the introduction of permanent active uses, including the non-residential unit, concierge / resident's lounge / gym area.
- 8.7.9 Site constraints such as substantial ground level changes, locally listed park (Arnos Grove), proximity to railway and Site of Importance for Nature Conservation (SINC) as well as proximity to neighbouring properties, were identified and understood and directly influenced the layout of the proposed development. The resulting layout seeks to minimise overlooking and preserve the amenity of local residents to an acceptable degree, given the constraints of the site.

8.7.10 Scheme layout (together with scale and massing) is assessed to be in accordance with Enfield's adopted NCAAP policy (NC Policy 17 Arnos Grove Station) which states that respecting the setting of the station could be achieved by setting the building line of new development back so that views from the local centre are not interrupted.

Scale, height and massing

- 8.7.11 While the proposed height and scale of the buildings is a change compared with the site's current condition (a brownfield site with a single small kiosk structure, lamp posts and parking barriers), officers consider it to be well handled, and sympathetic to the designated heritage asset / listed building, the preservation of which is important (see below).
- 8.7.12 The principle of introducing height and massing at transport nodes is supported by planning policy. As assessed above, the site is identified as an 'opportunity site' within Enfield's adopted development North Circular Area Action Plan at NC Policy 2 (Opportunity Site 7). With NC Policy 17 noting the site has potential to be released for redevelopment. A magnitude of change at this site is therefore considered acceptable, subject to detailed assessment of the scheme.
- 8.7.13 Scheme massing has evolved as a sophisticated response to the site's constraints. Proposing varied heights across the site which respond to complex site-specific considerations including topography, maximising mature tree retention and the listed building. The massing strategy for the scheme was informed by analysis of impacts, including consideration and assessment of the scheme's potential impacts on neighbouring properties this is aligned with London Plan Policy D3 (ItP) which requires that developments optimise capacity through a design-led approach, by responding to a site's context, capacity for growth and supporting infrastructure capacity.
- 8.7.14 Blocks A01 and B01 (which flank the listed building to the east and west) present as modest human-scaled elements onto Bowes Road, importantly preserving views towards the station. Taller buildings take advantage of the significant site slope to reduce perceived height.
- 8.7.15 The scheme underwent several iterations throughout the pre-application process and a further revision during consideration of the scheme in response to Officer comments. The scheme was revised in September 2020, with revisions including separate private external amenity space; redivision of communal and private amenity space to ensure amenity space throughout the site was allocated for optimum use; and revisions to the materiality of the boundary area between the Proposed Development and existing neighbouring properties.
- 8.7.16 Overall, the proposed massing, scale and siting of the proposed buildings is considered to ensure a positive sense of hierarchy is maintained across the site, and that the listed building is not dominated by the proposal and importantly that its setting is preserved and enhanced.
- 8.7.17 Scale and massing (together with layout) were explored throughout a lengthy pre-application process, including discussion with Historic England and the

Council. This included reductions in height to Block A02 to minimise its visibility in the setting of the listed Underground station. Scale and massing are assessed to be in accordance with Enfield's adopted NCAAP policy (NC Policy 17 Arnos Grove Station) which states that new development would need to respect the setting of the Grade II listed station building. In respect of DMD Policy 43 the scheme is not considered to fall within the criteria for assessment.

- 8.7.18 The proposals comprise 4 blocks (A01, A02, B01 and B02). Half of the blocks are four storeys or less. The tallest blocks, to the north of the site are substantially lower than several taller buildings within proximity of the site, which form part of the existing townscape (with heights of up to thirteen storeys). Fronting onto Bowes Road, the proposal has a prevailing height of between 1, 3 and 4 storeys, introducing modest and human-scaled elements compatible with, and in some cases lower than surrounding buildings. Buildings up to six-storeys along main thoroughfares such as Bowes Road already exist to the west of the site. The proposal has not been referred to (or accepted by) the Mayor of London based on height it is referable based on unit numbers.
- 8.7.19 The overall scale and massing of the scheme is considered to accord with London Plan Policy GG2 (ItP) which encouraged that new buildings and spaces respond to form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment. The varied and stepped height approach is supported by National Design Guidance which notes this can create a varied roof line, so that a development can sit sensitively in the wider (historical) context.

Character and townscape, including views

- 8.7.20 NPPF, London Plan and Enfield Policies are supportive of optimising sites provided that developments are of a high-quality design that are sympathetic to the surrounding area. Adopted London Plan Policies 7.1 and 7.4 and London Plan Policies D1 and D2 (ItP) seek to ensure that new developments are well-designed and fit into the local character of an area. Adopted London Plan policies require developments to optimise housing output, taking into account local context and character. Policy 3.5 of the current London Plan seeks to enhance the quality of local places taking into account local character and density. Core Strategy Policy 30 states that all developments and interventions in the public realm must be high quality and design-led. Development Management Document policy DMD 37 notes that development should be suitable for its intended function, appropriate to its context and regard to its surroundings.
- 8.7.21 Enfield Characterisation Study indicates the site is located in a Mixed Urban Areas Centre Metroland Centres typology. The Study states that with regards to 'Metrolands' these centres tend to be 'contemporary with their local area' as opposed to a centre that has evolved historically over time.
- 8.7.22 The applicant has submitted a Townscape Visual Impact Assessment (TVIA). The TVIA includes 11 verified views, agreed with Officers. Views A, B and C use a fully-rendered model of the proposed buildings and landscaping, while the remaining eight views illustrate the location of the proposed buildings with a green 'wireline', which is solid where the building outline will be visible and

- dashed where the building outline will not be visible. The TVIA assess the effects of the proposed development on these 11 views, identifying the nature of potential effects, their magnitude and their nature. It then goes on to consider cumulative effects.
- 8.7.23 The report concludes that 'the beneficial effects on townscape and views of the station resulting from the construction of the proposed buildings are considered to outweigh any adverse effects it will have on the three key views of the Grade II* listed Underground station from Bowes Road (Views A, B and C as illustrated below). The design has been led from the earliest stages by an understanding and response to the listed station and surrounding interwar townscape, and this is reflected in the final design, materiality, height, massing and scale of the new buildings'. The TVIA concludes that 'overall, the proposed development will have a beneficial townscape and visual impacts within the study areas and will preserve the significance and setting of Arnos Grove Underground Station'.



Fig. 1: View A - Proposed view from Palmers Road/Bowes Road



Fig. 2: View B - Proposed view from Railway Bridge



Fig. 3: View C - Proposed view from Bowes Road (opposite Arnos Road)

- 8.7.24 An objection has been received in respect of views from Arnos Park stating that the building will dominate the skyline. Officers have assessed proposed view G from Arnos Park (western section) together with the Design and Access Statement and Heritage Statement in detail which all consider the impact on views from Arnos Park in detail (see also heritage assessment below). The proposal will result in some impact on the park, introducing a new urban development as a permanent part of this view with a minor detrimental effect (more pronounced in winter). This effect is mitigated through modulation of the scheme's scale and massing reducing its visual impact.
- 8.7.25 An objection has also been received in respect of the views from Pymmes Brook, near Waterfall Road - noting that no view has been submitted showing the railway arches, which are locally listed. Views were agreed through discussion with the applicant and included consideration of the likely nature and magnitude of any effects. While no view has been submitted, the railway arches are considered within the context of the scheme's development as part of the site's opportunities and constraints as demonstrated by the submitted Design and Access Statement which includes photos of the railway arches (although these do not include the proposed scheme). Officers have visited the site, and considered the potential impact, this has included in reference to view G (Arnos Park - western section). View G is taken at a point closer to the proposed scheme, and further east giving direct views towards the scheme. Officers have assessed that views of the scheme from Pymmes Brook, near Waterfall Road would have no greater visual impact than the one seen from View G. The scheme would have a lesser and limited impact. The railway arches would continue to dominate the view.
- 8.7.26 Officers are satisfied the 11 selected viewpoints assessed in the TVIA have provided a robust framework for assessing the impacts of the scheme on heritage assets, townscape and landscape character. TVIA views were agreed at pre-application stage with LB Enfield and Historic England.
- 8.7.27 Officers have assessed there will be an impact in terms of views arising from the development, the three key views illustrated above will be changed with a moderate scale of effect and aspects of this impact will be adverse. These are balanced with other aspects of the development which will have a beneficial impact of views of the station. The proposal is assessed as truncating some more distant views of the station from further east along Bowes Road and generally affect the sense of isolation around the main station building. Other aspects of the development will have a beneficial impact on views of the station. For example, where views of the ticket hall drum's roofline will be maintained in shorter views from Bowes Road, illustrated in Views A and B maintaining the station's prominence in the townscape.
- 8.7.28 The approach to form, height, scale and massing would also introduce a stronger sense of place and would also introduce a well-designed, contemporary development that would have a stronger and more positive presence compared to the existing situation. On balance, Officers agree with the conclusions of the TVIA and consider the scheme would generally have a positive effect on townscape. The scheme would not affect any strategic views identified in the London Plan. The Proposed Development is considered to represent a high-quality design, which will help create a distinctive sense of place and will make a positive contribution to the wider townscape. The layout and scale of the scheme was amended during pre-

application in line with adopted Enfield North Circular Action Plan NC Policy 17 Arnos Grove Station – to ensure that it respect the setting of the station, setting the building line of new development back so that views from the local centre are not interrupted.

Articulation and Materials

- 8.7.29 As well as the importance of height differentiations and carefully varied massing in the Development, high-quality architectural articulation, materiality and elevational treatment is essential. The architectural approach can help integrate a development into its context through careful use of articulation, proportions, materials and elevational treatment, helping to give a building an identity. As such, this element of the proposal has been the subject of significant discussion between the Council and the applicants during preapplication stage and during the live submission, resulting in refinements to the design.
- 8.7.30 The proposal has gone through several iterations to test a variety of design responses in relation to architectural approach and the elevational treatment. The current proposal seeks to provide a robust, simple symmetry that achieves visual interest without becoming overly complicated or busy and aligns with the simplified forms of the modernist movement. The resulting design is considered to respect the rounded modernist 1930s design of the London Underground station. The submission documents refer to the integration of projecting banding to "group windows together and provide an overarching horizontal order" and this approach is supported by Officer's.
- 8.7.31 Likewise, the use of projecting balconies with high quality railing (noting that a planning condition requiring details of balcony materials is recommended); and the close attention paid to the articulation of windows throughout the Development, is supported by Officers. The resulting variation across the site ensures the buildings do not dominate the Station but instead add variety and visual interest to complement the listed building. This approach is considered a substantial improvement on the existing situation. Planning conditions pertaining to materiality are recommended to ensure the areas of proposed public realm are of a high quality and the built form is exemplary in terms of materiality.
- 8.7.32 There has been substantial discussion on articulation and materiality in respect of the scheme, including the gable end of 348 Bowes Road, facade treatment of Block A01 (to be more symmetrical) and materiality. Officers have weighed these with the scheme's merits. These are summarised at Sections 1 and 11 and include the improved setting to the listed building and careful consideration of the three key factors LPAs are required to consider in determining proposals that affect heritage assets (NPPF paragraph 189). Taken on balance and considering the scheme benefits the proposed articulation and elevational treatment is considered to be of a very high standard and, will help create a distinctive sense of place in and around the Station, resulting in the Development making a positive contribution to the area.

Conclusion of Design

8.7.33 The National Design Guidance sets out that well-designed places have ten key characteristics which work together to create its physical character and

help to nurture and sustain a sense of community. The Guidance further states that these 10-characteristics contribute towards the cross-cutting themes for good design set out in the NPPF. The ten characteristics are as follows:

- 1. Context enhances the surroundings:
- 2. Identity attractive and distinctive;
- 3. Built form a coherent pattern of development;
- 4. Movement accessible and easy to move around;
- 5. Nature enhanced and optimised;
- 6. Public spaces safe, social and inclusive;
- 7. Uses mixed and integrated;
- 8. Homes and buildings functional, healthy and sustainable;
- 9. Resources efficient and resilient; and
- 10. Lifespan made to last.
- 8.7.34 The application has been subject to significant pre-application and postsubmission discussion with urban design officers. While not all amendments
 were secured in response to comments from the urban design team, they
 have concluded that they are largely supportive of the application, concluding
 that planning gains outweigh other matters. Officers have considered these
 comments in detail, including supportive comments made in respect of: the
 new square; overall scale and massing (seen as appropriate for both the
 context of the station and the surrounding context); design approach; creation
 of an active frontage to the square; tree retention; bronze balcony detailing;
 the car free nature of the scheme; and high level of cycle parking. The design
 has evolved in the context of a clear understanding of the site's opportunities
 and constraints, and the capacity of the site has been optimised to deliver as
 many units as possible, whilst respecting and responding positively to the
 local character, designations, natural and built infrastructure and heritage
 assets.
- 8.7.35 The Proposed Development is considered to meet all of the characteristics set out above to a degree, and in doing so creates a unique and distinctive development which does not seek to compete with the existing townscape or Station, but rather seeks to contrast and complement it. It achieves this by the use of thoughtfully designed and positioned buildings, well considered public realm and relevant and needed uses within the buildings. The Proposed Development has been well conceived on the basis of a clear design vision and being mindful of local character, history and landscape. This results in a development which provides a visually interesting and well-considered built intervention to the local area, as well as providing a much-needed upgrade to the public realm at the Station including a public square.
- 8.7.36 Objections have been received on the issue of the Proposed Development not being in keeping with the surrounding area, and as such will affect the visual appearance of the area and also how the height may affect neighbouring amenity. However, whilst these concerns are acknowledged there are also other matters to consider:
 - The site is within close proximity to a station (in this instance Arnos Grove underground station) which is considered a priority location for intensification and potentially suitable for buildings taller than the existing prevailing townscape;

- The site is brownfield land and as such is well suited to be more intensively developed including being able to absorb more density; and
- The Proposed Development is significant in size and in very close proximity to the listed Station however has been sensitively designed to ensure the Development does not dominate or overwhelm the listed building to an extent resulting in an adverse impact on the listed asset.
- 8.7.37 On the basis of the above the Proposed Development is considered to result in a high-quality scheme that will represent a vast improvement in public realm provision for the locality, whilst delivering a significant number of homes in well-designed buildings in a sustainable location. The Proposed Development is therefore considered to comply with relevant policies in relation to design and has been developed with cognisance of the relevant characteristics of the site and local area, particularly in relation to heritage. Planning conditions to secure quality materials and robust detailing is recommended to ensure the development is delivered to an appropriately high level of materiality and design detail.

8.8 Heritage Impact

8.8.1 Arnos Grove Station is a Grade II* listed building of unique importance to Enfield. It is one of the most highly regarded examples of Charles Holden's ground-breaking Modernist designs for the Piccadilly line extension. It is a key landmark for the local area. There is a statutory duty on decision makers to ensure the special interest of a listed building is properly considered as a material consideration when determining an application affecting its special interest or setting.

Relevant Policy and Legislation

- 8.8.2 In respect of listed buildings, the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 require that all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The Act places a statutory duty on decision makers to ensure the special interest of a listed building is properly taken into account as a material consideration when determining an application affecting its special interest or setting. If harm is identified, it should be given considerable importance and weight in any planning balance. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 9, refer to setting.
- 8.8.3 The Revised NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Chapter 16 of the Revised NPPF states that local planning authorities should require an applicant to describe the significance of

- any heritage assets affected, including any contribution made by their setting. It also encourages LPAs to take account of a non-designated heritage asset in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm.
- 8.8.4 Paragraph 200 of the Revised NPPF states that Local planning authorities should look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 8.8.5 Adopted London Plan Policy 7.8 and Draft London Plan (ItP) Policy HC1 'Heritage conservation and growth' state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Adopted Enfield Core Policy 31 (Built and Landscape Heritage) requires that special regard be had to the impacts of development on heritage assets and their settings, Enfield Core Policy 30 supports high-quality and design-led public realm. DMD 44 (Preserving and Enhancing Heritage Assets) requires that developments should conserve and enhance the special interest, significance or setting of a heritage asset. DMD 37 (Achieving High Quality and Design-Led Development) requires that Development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.
- 8.8.6 Historic Environment Good Practice Advice in Planning Note 3 provides information on good practice in relation to assessing impacts on the setting of heritage assets. Of note in the GPA is the inclusion of the consideration of views and whether there would be any impact to the significance of the views on the heritage asset as a result of the development. However, it is of note that a distinction is made between views that contribute to heritage significance and those valued for other reasons.
- 8.8.7 Historic England guidance entitled *The Setting of Heritage Assets, 2015* states: "Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing views of a building." [p.4]
 - Site and Immediate Setting Heritage context
- 8.8.8 The application site surrounds the Grade II* listed Arnos Grove underground station. Arnos Grove Underground Station and the station and its platforms are Grade II* listed. Grade II* buildings account for 5.5% of all listed buildings included on the National Heritage List and are deemed to have more than special architectural and historic interest. Structurally the building consists of a reinforced-concrete loadbearing frame with brick infill. The frame is clad in Buckinghamshire red and Staffordshire brindled blue brick with flat concrete slab roofs with dentiled soffits over.

- 8.8.9 The station is a landmark in the area and features an impressive interior space. Several walls extending either side of the main station (and lampposts) also form part of the listed curtilage designation. The Historic England listing description refers to the building's architectural and historic interest and intactness. The Station was opened on 19 September 1932 as part of the northern extension of the Piccadilly Line from Finsbury Park. Since then, it has become a key landmark for the local area. The station was originally granted Grade II listed status in 1971 which was upgraded to Grade II* in 2011 to reflect the building's status as an icon of British Modernist architecture.
- 8.8.9 The description states the following principle reasons for its designation:
 - architectural interest: a striking design with a prominent circular booking hall providing both an effective landmark and hugely impressive interior space. Its large panels of glazing making it particularly evocative when lit at night);
 - historic interest: probably the most highly regarded example of Charles Holden's ground-breaking Modernist designs for the Piccadilly Line extensions of the early 1930s. These were of great importance for introducing rational modern design based on continental models to a wider public and for imposing a brand image to buildings and design when this was still novel. They were widely praised in the architectural press at the time and remain influential today;
 - **intactness**: the station is largely unaltered and retains notable features such as the passimeter and telephone kiosks in the booking hall and platform structures.
- 8.8.10 The Applicant has submitted a Heritage Assessment in accordance with NPPF and adopted policy requirements DMD 44, which sets out a clear understanding of the historic environment and background to the heritage-led design development. Substantial pre-application discussion was undertaken in the assessment of the scheme, to ensure that the special interest of the listed building and setting were carefully considered. This included reduced the height of the two blocks closest to the station during the pre-application process so as not to detract from the prominence of the station building. Key design principles were set early in the design process to maintain and enhance the station's significance. This heritage-led design approach is in accordance with best practice, policy and guidance.
- 8.8.11 Layout, height and massing: The Heritage Statement submitted in support of the application notes that while alternative schemes to increase the height both in concentrated locations and more generally across the Sites were tested these were discarded as inappropriate due to the adverse impact that taller buildings would have on sensitive views of the Arnos Grove Station Building ticket hall drum approaching from both directions along Bowes Road. Consequently, the height of the proposed buildings has been kept relatively low across the site, while the massing has been varied to prevent the impression of the creation of a wall of development behind the station. A pergola structure which was also proposed during pre-application, but which was not supported by Enfield's independent Design Review Panel due to its

- potential impact on the setting of the listed building was also removed. A detailed assessment of layout, height, scale and massing is set out above.
- 8.8.12 Officers consider the proposal successfully enhances the setting of the listed station. The Officer assessment is supported by the views submitted by the Enfield Society, who consider the scheme protects the views of this important landmark building and that the development will provide an improved setting compared to the existing car park arrangements. The Enfield Society supports the proposal. The Society is represented on the former Conservation Advisory Committee and have noted that that group was also broadly supportive of the scheme (provided there was strict conditioning of materials). Historic England have not raised any objection. The Greater London Authority have concluded that the setting, historic and architectural significance of the listed building would also be preserved and enhanced by the development. Therefore, no harm is caused to the significance of the Grade II* listed Arnos Grove station.
- 8.8.13 The proposal is considered to preserve the setting of the listed building and in the wider townscape context would enhance its setting through sensitive architecture and design. The resultant development would also provide a new public square to the west of the building that would improve access to and the public experience of the building and thereby enhance its historic significance. The development is also largely deferential to the station, which remains the focal point in the local townscape, thereby preserving its architectural significance and its intactness.
- 8.8.14 The Design Review Panel noted in its final review that it supported the principle of protecting the silhouette and shape of the drum by working to not place buildings behind it. The proposals would result in an improved setting, including through the introduction of a new public square to the west of the station building. The design of the scheme is assessed as having sympathetically responded to this important designated heritage asset positively preserving and enhancing it.
- 8.8.15 In respect of the impact of the scale and massing on the booking hall large panels of glazing (and internal daylight of the booking hall) Officers have reviewed submitted material and are satisfied the scheme would not result in a detrimental impact on the light coming into the station and important element of the station's *architectural* interest. The proposals would not alter internal station features so would have no impact on the internal 'intactness' of the building.
- 8.8.16 Given the above, it is considered that no harm is caused to the significance of the Grade II* listed Arnos Grove station as a result of the Proposed Development. The proposal is assessed as enhancing the setting of the listed station.
 - Wider Setting Heritage Context
- 8.8.17 As noted above TVIA views were agreed at pre-application stage with LB Enfield and Historic England. Enfield's Conservation Officers have assessed that no adverse impact is found on surrounding heritage assets from the proposed development, in terms of scale and massing (see above).

- 8..8.18 Enfield's Conservation Officers have concluded that the proposed heights and siting of buildings ensure that a sense of hierarchy is maintained across the site, that the listed building is not dominated by any new development and that its setting is preserved. The transition in scale to address the change in heights between both the proposed scheme and Arnos Arms (non-designated heritage asset), and the Grade II* listed station building are well conceived.
- 8.8.19 Arnos Park is a local listed heritage asset, the significance of which is derived from its age, rarity, historic association, landmark status, designed landscape, social value and aesthetic merit (Enfield Local Heritage List, 2018). The submitted Heritage Statement states that 'the proposed development will be visible above the tree canopy in views south from within the central open area of the park, where no urban development is currently visible. This lack of development above the canopy contributes to the designed nature and aesthetic merit of the park, so the visibility of the proposed development will cause some harm to the park's significance'. The statement goes on to note that 'many elements of the park's character are derived from its proximity to urban development. During the winter, the surrounding residential streets are clearly visible beyond the boundary of the park'. As noted above, Officers have undertaken careful assessment, including site visits to consider potential impacts across the area, including Arnos Park. Officers agree with the conclusions of the Heritage Statement that the degree of harm, with mitigation, would be less than substantial by virtue of the park's existing character - which is already established as a designed landscape (Enfield Local Heritage List, 2018) bordered by existing development.

Public Realm Improvements/ Enhancements to Setting of Grade II* Listed Building

- 8.8.20 The existing car parks at Arnos Grove Underground Station are not part of the station's designed setting. The existing arrangement are of low townscape quality. The create a cap in the streetscape and along the high street. The car parks are assessed as not contributing towards to station's significant and can be considered to detract from its station's significance.
- 8.8.21 The proposal includes the formation of a public space/square, affording a degree of breathing space and an enhanced setting to the Grade II* listed station, and Officers are in support of this.
- 8.8.22 Attempts to enclose the blue badge parking area are welcomed. It is acknowledged that above and below ground site constraints will prohibit any potential improvements to the gable end wall of 348 Bowes Road. Whilst the details submitted for approval do not cover the bus stop area, it is understood this element of the scheme has been included within the red line boundary to allow for works to be undertaken via a Section 278 (Highways) agreement.
- 8.8.23 The Proposal includes part demolition of the listed car park wall which is supported in principle, subject to the submission of further details to be submitted via planning condition. Likewise details of other proposed associated works including the relocation and restoration of four lampposts; works to the walls and railings on the north and south sides of the forecourt; and works to the wall on the west side of the forecourt will be required via planning condition.

Design and Materials

8.8.24 The proposed brickwork will provide a simplistic, classical appearance which will not compete with the station and horizontal breaks created by concrete banding and the sculptural use of curved balconies are considered sufficient in this instance to break up façade. Bronze is proposed in balcony details, windows and railings and take cues from the characteristic bronze detailing found in Holden's station and these elements are supported. Details of all materials are required to be submitted via planning condition to ensure the proposed high-quality design is delivered on site.

Archaeology

8.8.25 No archaeological finds or features are recorded in the Greater London Sites and Monuments Record from this area, nor is the area designated as an area of archaeological interest. While the site has a long occupation history, it is unlikely that any remains of archaeological significance have survived the intensive redevelopment of the area in the later 19th and 20th centuries. However, a suitably worded archaeological condition is proposed, to ensure any buried remains are protected.

Conclusion of Heritage Impact

- 8.8.26 The Proposed Development has evolved to take account of its heritage setting and the applicants have tailored the design to specifically use a sensitive style of architecture that includes strong modernist and art deco elements in reference to the station. Enfield's Conservation Officers have concluded that the listed building is not dominated by the proposal and that its setting is preserved and enhanced, overall.
- 8.8.27 The proposal has been carefully assessed against the requirements of Section 66(1) of Planning (Listed Buildings and Conservation Areas) Act 1990, London Plan Policy (2016) 7.8, Enfield adopted Core Policy 30 and 31 and DMD 37 and 44 and the NPPF, including giving careful consideration to the three key factors LPAs are required to consider in determining proposals that affect heritage assets (NPPF paragraph 189 the desirability of sustaining and enhancing the significance of Heritage Assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of Heritage Assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness) and Historic England guidance 'The Setting of Heritage Assets [2015]'.

8.9 Neighbouring Amenity Considerations

8.9.1 London Plan Policy 7.6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Emerging London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Meanwhile Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Lastly

Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

Daylight/Sunlight

BRE Guidance - Daylight and Sunlight:

- 8.9.2 In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.
- 8.9.3 BRE Guidelines paragraph 1.1 states: "People expect good natural lighting in their homes and in a wide range of non-habitable buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by". Paragraph 1.6 states: "The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...".

BRE Guidance - Daylight to Existing Buildings:

- 8.9.4 The BRE Guidelines stipulate that... "the diffuse daylighting of the existing building may be adversely affected if either:
 - the VSC [Vertical Sky Component] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value." (No Sky Line / Daylight Distribution).
- 8.9.5 At paragraph 2.2.7 of the BRE Guidelines it states: "If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the development in place is both less than 27% and less than 0.8 times is former value, occupants of the existing building will notice the reduction in the amount of skylight. The area of lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time."
- 8.9.6 The BRE Guidelines state (paragraph 2.1.4) that the maximum VSC value is almost 40% for a completely unobstructed vertical wall.
- 8.9.7 At paragraph 2.2.8 the BRE Guidelines state: "Where room layouts are known, the impact on the daylighting distribution in the existing building can be found by plotting the 'no sky line' in each of the main rooms. For houses this would include living rooms, dining rooms and kitchens. Bedrooms should also be analysed although they are less important... The no sky line divides points on the working plane which can and cannot see the sky... Areas beyond the no sky line, since they receive no direct daylight, usually look dark and gloomy compared with the rest of the room, however bright it is outside".

- 8.9.8 Paragraph 2.2.11 states: Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative impact on the VSC, and on the area receiving direct skylight." The paragraph goes on to recommend the testing of VSC with and without the balconies in place to test if it the development or the balcony itself causing the most significant impact.
- 8.9.9 The BRE Guidelines at its Appendix F gives provisions to set alternative target values for access to skylight and sunlight. It sets out that the numerical targets widely given are purely advisory and different targets may be used based on the special requirements of the proposed development or its location. An example given is "in a mews development within a historic city centre where a typical obstruction angle from ground floor window level might be close to 40 degree. This would correspond to a VSC of 18% which could be used as a target value for development in that street if new development is to match the existing layout"
- 8.9.10 Paragraph 1.3.45-46 of the Mayor of London's Housing SPD states that:

'Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.

8.9.11 The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.'

BRE Guidance - Sunlight to Existing Buildings:

- 8.9.12 The BRE Guidelines (2011) state in relation to sunlight at paragraph 3.2.11: "If a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window:
 - Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and

- Receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours."
- 8.9.13 The BRE Guidelines state at paragraph 3.16 in relation to orientation: "A south-facing window will, receive most sunlight, while a north-facing one will only receive it on a handful of occasions (early morning and late evening in summer). East and west-facing windows will receive sunlight only at certain times of the day. A dwelling with no main window wall within 90 degrees of due south is likely to be perceived as insufficiently sunlit."
- 8.9.14 They go on to state (paragraph 3.2.3): "... it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun.
 - BRE Guidance Open Spaces:
- 8.9.15 The Guidelines state that it is good practice to check the sunlighting of open spaces where it will be required and would normally include: 'gardens to existing buildings (usually the back garden of a house), parks and playing fields and children's playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between non-domestic buildings and in public squares, focal points for views such as a group of monuments or fountains'.
- 8.9.16 At paragraph 3.3.17 it states: "It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March."
- 8.9.17 Whilst the BRE guidelines are not mandatory, the suitability of a proposed scheme for a site within the context of BRE guidance is largely the accepted approach. When reviewing the findings of a daylight/sunlight assessment, consideration will be given to the urban context within which a scheme is located, and daylight/sunlight will be one of a number of planning considerations which is considered.

Daylight/Sunlight Analysis

- 8.9.18 Some concerns have been raised during the consultation process from neighbouring properties in respect of the impact of the proposed development on surrounding daylight and sunlight leading to an impact on residential amenity.
- 8.9.19 A 'Daylight & Sunlight Impacts to Neighbouring Properties' report has been submitted as part of the application and based on proximity to the Proposed Development, the following properties were identified as relevant for daylight and sunlight assessment (also shown in Fig. 4 below):

Bowes Road – No's 348, 350, 352 and 354 Brookdale - No's 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31 Walker Close – No's 1, 2, 3, 4, 5, 6 and 27 Arnos Road – No's 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21 The Arnos Arms 338 Bowes Road



Fig. 4: Properties identified for analysis (Plan view) – note the numbers do not indicate individual property numbers and are shown for analysis purposes



Fig. 5: showing relationship of surrounding properties in relation to the proposed development

- 8.9.20 On Site A, nearest to Brookdale the proposed buildings are at least 33.5m away from the rear façade of existing properties. On Site B, nearest to Arnos Road the proposed buildings are at least 34.5m distance from the rear façade of existing properties. On Brookdale and Arnos Road, the rear of the properties typically accommodate lounge/kitchen/diners at ground floor and bedrooms at first floor. Desktop research indicates that existing properties in Brookdale and Arnos Road are dual aspect and would therefore have more than one good light source throughout the course of the day. However the distances between existing properties and the proposed buildings exceed the minimum required distance of 30m set out by DMD10 and far exceeds the minimum recommended distance of 18-21m between facing homes (habitable room to habitable room) set out in the Housing SPG.
- 8.9.21 The following properties were found to comply with relevant BRE Guidelines and as such were not assessed further:

Bowes Road – No's 348, 350, 352 and 354 Brookdale - No's 1, 3, 7, 9, 25, 27, 29 and 31 Walker Close – No 27 Arnos Road – No's 3, 5, and 21 The Arnos Arms (338 Bowes Road) 8.9.22 Of the remaining properties (than those listed in Para. 8.8.21 above) 20 will experience reductions in daylight and/ or sunlight, as follows:

Brookdale - 5, 11, 13, 15, 17, 19, 21 and 23 Walker Close - 1, 2, 3, 4, 5 and 6 Arnos Road - 7, 9, 11, 13, 15, 17 and 19

8.9.23 Further assessment of these properties found that whilst they would experience reductions in daylight and/ or sunlight they would still exceed the numerical targets set out in the BRE Guidelines. Across these properties 95 rooms and 119 windows were assessed for changes in daylight (VSC and NSL) and 33 rooms with 37 windows were assessed for changes in sunlight (APSH). A short summary is given below for each property where a reduction in daylight and/ or sunlight is predicted. For the purposes of the assessment only habitable, (or rooms believed to be habitable from desktop research findings) were assessed. Habitable rooms do not include rooms such as bathrooms, cloakrooms, hallways or utility rooms etc.

Conclusion of Daylight & Sunlight

- 8.9.24 The deeper assessment concluded that 68.9% of the windows assessed meet the BRE standards and a majority of the remaining windows that do not meet the guidelines are only marginally affected by the proposals, and either continue to achieve a level (20% or more) that GLA guidance considers to be reasonably good and appropriate in an urban environment or do not currently meet the minimum standard (without the development in place).
- 8.9.25 The assessment found that of the 95 rooms 76.9% fully comply with the criteria set out in the BRE Guidelines. The remaining rooms are predominantly bedrooms where this measure is less relevant as bedrooms are mainly used for sleeping and continue to have a good view of the sky.
- 8.9.26 The APSH assessment conclude that 83.3% of those windows assessed fully comply with the BRE criteria and the remainder would not be impacted disproportionately when assessed in the context of the urban environment.
- 8.9.27 It is recognised that some reductions are attributable to the design of particular buildings, and whilst there is a breach of the BRE Guidelines in relation to the daylight levels, the retained levels within the property are considered to be appropriate given that the low existing values are causing disproportionate percentage alterations and given the urban grain of the location.
- 8.9.28 In relation to sunlight, as noted above the majority of the properties assessed remain fully compliant with BRE Guidelines (compliance at 89.8% of the rooms assessed). Where there are derogations from guidance are noted, these are relatively minor in nature and there are mitigating reasons for them such as the orientation of the windows and/or property. Notwithstanding, overall the sunlight levels will remain adequate as a result of the implementation of the Proposed Development.
- 8.9.29 Also as noted above some departures to the BRE Guidance occur. However, the deviations are considered to be acceptable when viewed in relation to the location of the site, the quantum of development being proposed and the

- unique existing scenario of the undeveloped car parks which would by default have little or no impact. As such, any modest size development would have some level of impact.
- 8.9.30 The marginal transgressions when assessed against the BRE guidance are experienced by properties surrounding the site, however still meet the standards set out by the GLA when taking the local urban typology into consideration. The proposed buildings have been located away from the boundaries of the site, which minimises the impacts on neighbouring properties. Furthermore, despite some properties experiencing some transgressions of daylight and sunlight against the BRE standards, this is considered acceptable in the urban environment of Arnos Grove and accords with the standards accepted by the Housing SPG. In accordance with this criteria, the neighbouring properties are considered to achieve suitable levels of residential amenity with the Development in place.
- 8.9.31 In conclusion the impacts of the Proposed Development in relation to daylight and sunlight are considered to be limited given the scale of the development and the urban nature of the local area, with levels of daylight and sunlight in most of the neighbouring residential properties remaining largely unaffected by the proposals.

Overshadowing

- 8.9.32 In addition to the above daylight and sunlight assessment the applicants also undertook an overshadowing analysis of nearby properties. Thirty-three (33) properties in the immediate vicinity of the site with identified external amenity space were assessed for impact as follows:
 - Rear gardens of 1-31 (odd) Brookdale;
 - Rear Gardens of 1-6 Walker Close: and
 - Rear Gardens of 1-21 Arnos Road
- 8.9.33 The overshadowing assessment found as follows:

Rear gardens of 1-31 (odd) Brookdale:

- The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted;
- The rear gardens all see a minimal reduction ranging from 0.01%-4.33% of the area receiving direct sunlight for at least two hours on the equinox; and
- All gardens have at least 88%-100% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

Rear gardens of 1-6 Walker Close:

- The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted;
- The rear gardens all see a minimal reduction ranging from 0.00%-0.04% of the area receiving direct sunlight for at least two hours on the equinox; and
- All gardens have at least 99%-100% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

- Rear gardens of 1-21 Arnos Road:
- The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted;
- The rear gardens all see a minimal reduction ranging from 0.04%-6.65% of the area receiving direct sunlight for at least two hours on the equinox; and
- All gardens have at least 83%-99% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

Conclusion of Overshadowing

- 8.9.34 The BRE Guidelines suggests that 'Sun Hours On Ground' assessments should be undertaken on the Spring Equinox (21st March). With regards to overshadowing of amenity spaces BRE Guidelines states that "for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of direct sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above guidance, and the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable".
- 8.9.35 An assessment of neighbouring rear gardens shows they would not be materially impacted by the proposals, and minor overshadowing impacts will not be perceptible. With the development in place, all neighbouring gardens continue to receive sunlight within at least 83% of their area for at least two hours on the equinox with the development in place. This exceeds the minimum of 50%, with many receiving it across 100% of their area. Therefore, given these results it is considered that the overshadowing impacts to each garden is acceptable.

Privacy, Overlooking and Outlook

- 8.9.36 Draft London Plan (ItP) Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing. Adopted London Plan (2016) Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. It notes the need for an appropriate degree of flexibility when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to town centres and accessible locations, where BRE advice suggests considering the use of alternative targets taking into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.
- 8.9.37 The Mayor of London's Housing SPG does not support adhering rigidly to visual separation measures as they can limit the variety of urban spaces and housing types in the city. Standard 28 of the Mayor of London's Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.

- 8.9.38 Adopted Enfield Policies DMD 6 and 8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Adopted Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment. Adopted Enfield Policy DMD10 is silent on this type of relationship, but requiring that development not compromise adjoining sites.
- 8.9.39 The Site is adjacent to Arnos Grove Underground Station partially within a Local Centre and is Urban in character. Whilst the development will be somewhat larger and taller than the existing buildings, it will not be untypical of buildings located in urban locations.
- 8.9.40 The positioning and massing of the buildings has sought to keep taller elements to the north of the site, away from the station and the frontage, as well as away from the neighbouring properties. The topography of the site means that it drops steeply to the north, on both Site A and Site B, reducing perceived height by utilising the downward slope.
- 8.9.41 The Proposed buildings are set away from existing housing so far as possible to minimise any potential for overlooking and/or overshadowing of neighbouring properties. In terms of specific distances, the Proposed buildings are approximately 33.5m away from the rear façade of existing properties on Site A and approximately 34.5m distance on Site B. Communal gardens and access routes have been located to the east and west boundaries consistent with residential fronts and backs.
- 8.9.42 The distances between existing and proposed homes are considered proportionate, within an urban setting. Moreover, currently this is a public car park allowing people to stand directly to the rear of private gardens of existing homes along Brookdale, Walker Close and Arnos Road. The existing situation results in members of the public having direct views into the rear gardens and in some cases, into the living spaces of existing homes.
- 8.9.43 The proposals include densely planted boundary and fencing to provide security and privacy to adjacent gardens at ground. This proposed arrangement is considered to echo traditional back-to-back gardens, introducing a garden-to-communal green relationship and would reduce direct overlooking into rear gardens at ground level.
- 8.9.44 At upper levels, in addition to the separation distances set out above an 800mm raised sill to windows is used throughout the scheme for bedrooms and secondary windows to living spaces. This provides both greater privacy for future occupiers of the Development and mitigates overlooking of neighbouring gardens. Tightly spaced stanchions are proposed to the lower portion of balconies to mitigate overlooking.

Summary of Privacy, Overlooking and Outlook

- 8.9.45 The siting of the Proposed buildings in relation to nearby occupiers are of enough distance to protect amenity of existing neighbouring occupiers as well as future occupiers of the Development. Communal gardens and access routes have been located to the east and west boundaries of the proposed buildings to echo the traditional fronts and backs pattern found in nearby residential properties. In addition, screening will be provided in the way of planting and fencing to provide further privacy. Screening, fencing and boundary treatments will be subject to approval of details via a planning condition.
- 8.9.46 The proposals include set-backs and buffers in line with Standard 28 of the Mayor of London's Housing SPG and would not cause unacceptable harm to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing.
- 8.9.47 A change in the relationship between the existing homes will take place, which is typical of managed change in an urban location, and not considered significant enough for the development not to be supported particularly as the proposals exceed traditional and past planning guidance 'yardstick' for privacy of 18 21m (between habitable room and habitable room).
- 8.9.48 Subject to conditions, requiring full details of the proposed screening and boundary treatment throughout the Site, the Proposed Development is considered acceptable in terms of privacy, overlooking and/or outlook.

Noise and Disturbance

- 8.9.48 Guidance relevant for the assessment of noise affecting new developments is given in the February 2019 National Planning Policy Framework (NPPF). Paragraph 180 sets out that that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to a) 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life'.
- 8.9.49 Meanwhile Policy D14 of the London Plan (Intend to Publish) sets out that in order to reduce, manage and mitigate noise to improve health and quality of life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. Lastly, London Plan (Intend to Publish) introduces the concept of 'Agent of Change' which places the onus on the new development to ensure adequate noise mitigation measures are in place if their development will be close to a noise generating use (in this instance the Arnos Arms is in close proximity and the proposed commercial unit at the front of building A01 has the potential to generate some level of noise).

- 8.9.50 The proposed residential development is consistent with the existing prevailing residential use in the area and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the residential element of the development. The proposal also includes an 89sq.m commercial unit which will be used either in a retail, restaurant, café or drinking establishment capacity. The unit will be located at ground floor level in building A01, overlooking the proposed square. In order to protect the amenity of existing nearby occupiers and future occupiers of the Development, a condition is recommended restricting opening and operational hours of the commercial unit. Subject to this condition the commercial unit would not be considered likely to give rise to any unacceptable adverse amenity impact in terms of noise and disturbance. In addition, the managed nature of the development will also provide extra measures to deal with any unexpected noise disturbance should they arise.
- 8.9.51 With regards to noise impact to future occupiers of the Development as a result of proximity to the railway lines, the submission documents include a Noise and Vibration Assessment which recommends mitigation measures are implemented to address groundborne noise and vibration impact. These measures could include suitable glazing and ventilation and vibration isolation intervention above the foundations of the four buildings. In order for noise and vibration levels to remain at an acceptable level a planning condition is recommended to secure this in line with relevant policy and guidance as outlined above.
- 8.9.52 With regards to occupier amenity it is recognised that most developments in urban areas will be subject to noise levels above the BS8233 recommended levels for balconies. However, it is reasonable to assume that future occupiers would prefer the option to have a noisier balcony as opposed to having no balcony at all.
- 8.9.53 Furthermore, it is acknowledged that there are no other noise mitigation measures available for balconies other than fully enclosing them (i.e. 'winter gardens'), which essentially changes the balconies into internal rooms. On this basis the development is considered acceptable in relation to noise levels in external to private amenity areas.

Light Pollution

8.9.54 It is recognised that that there is the potential for some level of light pollution arising from the development. Whilst it is acknowledged that a large development will likely generate significantly more light than the existing car parks, a planning condition is recommended requiring details of external light spill and light spill to internal communal areas to safeguard against adverse impact. In relation to individual residential units, it is not considered light generating from the flats would be unreasonable given they are expected to be used in a normal residential fashion.

Conclusion of Neighbouring Amenity Considerations

8.9.55 Whilst concern has been raised by local residents in relation to loss of daylight/sunlight arising from the development the proposal is not considered to result in sufficient harm to render the scheme unacceptable. It is also noted that concern has been raised from people living a sufficient enough distance from the development that they have not been included in the analysis. As

such, taking into account existing levels of light to the properties and the urban context of the site, it is considered that the analysis satisfactorily demonstrates that whilst there are some deviations, these are not significant enough to warrant the scheme unacceptable, particularly in the context of the urban setting of the development, whereby some impact is expected to occur. This approach is in line with BRE guidance and policy and the Proposed Development is therefore considered acceptable in terms of daylight and sunlight impact to neighbouring occupiers.

- 8.9.56 In terms of outlook, privacy and overlooking as outlined above in the siting of the proposed buildings in relation to nearby occupiers are of sufficient distance to protect amenity of existing neighbouring occupiers as well as future occupiers of the Development.
- 8.9.57 With regards to potential noise and disturbance arising from the use/occupation of the development it is noted that there is some level of concern from neighbouring occupiers in relation to this. It is also noted that there is concern that existing noise and disturbance could become worse however as a result of new measures in terms of vehicle movements and drops-offs, and improved building fabric and internal noise mitigation measures, it is considered that the opposite will likely occur. That is, the proposed new measures, will result in a quieter facility, despite the intensification of the use.
- 8.9.58 Notwithstanding the above, subject to conditions pertaining to noise levels and light spill, the Proposed Development is considered acceptable in terms of amenity impact to neighbouring occupiers and is in line with relevant policies DMD 8, 37 & 68, CS Policy 4, London Plan (Intend to Publish) Policies D4, D6 and D14 and existing London Plan Policies 3.5 & 7.15.

8.10 Transport Considerations

- 8.10.1 Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced so as to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling.
- 8.10.2 Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.
- 8.10.3 London Plan (2016) Policy 6.1 encourages partnership working in terms of transport and development that reduce the need to travel, especially by car whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy also supports measures that encourage shifts to more sustainable modes of transport.

- 8.10.4 London Plan (Intend to Publish) Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes that is by foot, cycle or public transport by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 8.10.5 London Plan (Intend to Publish) Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Meanwhile intend to publish London Plan Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Lastly intend to publish Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 8.10.6 Parking, highway and pedestrian conflict and increased traffic levels has been cited as a concern from neighbouring properties. To that end the Council's Transportation Team has advised that the Transport Assessment and assorted appendices submitted have considered the transportation aspects, impacts and appropriate mitigation for the Proposed Development.
- 8.10.7 The Proposal is considered to be very well placed for access to public transport services and is located in an area of formal parking control (Arnos Grove CPZ 11am to 12noon). However, there is potential for a number of potential impacts to arise and as such suitable mitigation will be necessary to manage these to make the development acceptable in transportation terms.

Assessment

- 8.10.8 Existing conditions: The site is directly adjacent to the London Underground Station and has a PTAL rating of 4 to 6a (with 6a being excellent) with access to the Piccadilly line and good bus connections including a bus interchange at the front of the Site.
- 8.10.8 There are four bus stops in the area: stops U, T, A and B, which serves routes 34, 184, 232, 251, 298, 382 and N91 which provide connections to destinations including Palmers Green, Walthamstow Central, Barnet, Turnpike Lane Station, Potters Bar, Edgeware Road, and Southgate. A wide catchment area is served by the bus routes. The bus interchange is currently used for through routes and terminating routes. There are local cycle routes along the northern side of the A406 and through Arnos Park (connecting to Ashridge Gardens). Minor improvements will be made to the bus interchange in the way of the relocation on one bus stop to allow for associated works to the public realm and pedestrian and cycle infrastructure.
- 8.10.9 The site's PTAL rating of excellent (6a), and the range of public transport services to the station and from the station provide a variety of travel destinations via both the London Underground and the bus networks.
- 8.10.10 The availability of the existing car parking is encouraging some people to drive to the station rather than use the public transport that is available.

8.10.10A taxi facility, which can accommodate two taxis, has been shown within the bus interchange design.

Existing Public Transport Capacity

- 10.10.11 Preliminary transport surveys undertaken by the developers identified that the existing car park may encourage journeys by private car and the trip origin of up to 99% of car park users is within walking distance of an underground station, railway station or bus stop, whilst the remaining 1% have a station or bus stop closer to their trip origin than Arnos Grove Station.
- 10.10.12 The applicants transport survey suggests that removing the car park would discourage unsustainable patterns of travel behaviour currently experienced at Arnos Grove encouraging users to consider sustainable travel alternatives.
- 10.12.13 In terms of existing public transport capacity, the submitted Transport Assessment has identified a potential average increase of 2 to 3 people on each bus service during the morning and evening peak, which is considered to have a negligible impact on public transport capacity.

Parking assessment

10.12.14 There are two aspects to the parking assessment: There is the loss of the station parking; and the 'car-free' approach in respect of the residential development (apart from the blue badge spaces). The existing and proposed car parking provision is as follows:

Table 5: Existing and proposed car parking provision

	Station Parking (general)	Station Parking (Blue Badge)	LUL	Blue Badge (residential)	Total
Existing	297	6	10	0	313
Proposed	0	6	10	5 (+11	21
				passive)	

Loss of existing car parking and dispersion

- 10.12.15 Significant objection has been raised from the consultation process in relation to the potential for displacement of car parking resulting from the loss of the existing car park. The potential impact of losing the 292 spaces is that users of the station will either: find alternative ways to get to work and travel to other destinations; relocate to other stations; or park outside the existing Controlled Parking Zone already in place.
- 10.12.16 In terms of impact on commuters who drive to the station the applicant has submitted supporting information and evidence in respect of the likely impacts of the removal of the proposed station car park. To understand the estimated outcome current use of the car parks was considered through parking surveys (2019). Surveys were taken on car occupancy and trip origin. The results are contained in the Transport Assessment (TA) submitted in support of the planning application

- 10.12.16 The results show almost all car park users have the potential to choose alternative sustainable routes to work. They also show less than half of the (46%) of car park users originate in Enfield. A more detailed breakdown is as follows (these add up to more than 100% as some users have multiple alternative options):
 - 33% and 50% of users live within walking distance of tube or rail and would have the opportunity to switch travel mode. This is a long-term ongoing ambition of Enfield and is being supported with additional infrastructure through a range of initiatives, including Healthy Streets work, of which this development will be expected to contribute towards;
 - 68% live within walking distance of a bus serving Arnos Grove and will still be able to access the station via bus or potentially cycle;
 - 5% of trips originate outside the M25.
- 10.12.17 Officers have assessed the loss of the car parks will result in varying degrees of impact. Some of these impacts would be adverse. Officers have assessed that these impacts are, on balance, acceptable subject to appropriate mitigation, based on:
 - the benefits of the scheme: these are set out and summarised at Section 1
 of this report and assessed in detail throughout. Officers consider that these
 outweigh the impacts on the proportion of private car users who would lose
 access to the two existing car parks;
 - Housing, and affordable housing priorities balanced against parking:
 Housing, including affordable housing need is an Enfield and London-wide
 issue. Parking availability does not impact all Enfield households. Census
 data shows that 33% of households in Enfield have no access to a car or van
 – meaning their existing travel behaviours are already likely to be sustainable
 as that they tend to use public transport, walk or cycle.
 - Policy priorities and weight: Enfield adopted policies are clear in emphasising the priority placed on delivering high-quality housing, including affordable housing. The same policy weight and protection does not exist in respect of parking. Adopted London Plan and emerging London Plan (ItP) policies give weight to the use of underutilised sites, such as car parks, for new housing.
 - Enfield's current corporate and statutory commitments towards the Mayor of London's Transport Strategy targets: Encouraging sustainable travel options supports Enfield in achieving the Mayor of London's target to increase active and sustainable modes across London to 80%. Enfield receives annual funding from Transport for London to deliver the Mayor's Transport Strategy outcomes within Enfield through a funding and programme process known as a Local Implementation Plan. The LIP is a statutory document arising from the GLA Act 1999. Each borough's LIP covers proposals to implement the Transport Strategy of the Mayor of London (MTS), locally within the area of each borough.
 - The Climate Emergency and Enfield's Climate Action Plan 2020: Enfield Council's Cabinet declared a state of climate emergency in July 2019. Emissions from transport in Enfield account for an estimated 39% of the borough's total emissions. Shifting movement to low carbon transport,

- prioritising walking and cycling, will achieve the Mayor of London's target to increase active and sustainable mode share across London to 80%. It is also an important part of delivering the UK's commitment to have net zero emissions by 2050.
- 10.12.18 It is concluded that whist the loss of station parking will have some impact on residents, and a minority from outside of the M25, the submitted surveys suggest that most users have the potential to use alternative transport modes to either get to the station, or to alternative stations. Given any impact is a direct consequence of the development, a suitable Section 106 package towards local improvements should be secured to support the modal shift. Officers have recommended that a suitable s106 package be secured. Officers have also secured mechanisms with the Section 106 legal agreement to monitor this and if necessary, seek mitigation from the developers in order to address any unanticipated impact.

The impact of the loss of parking on local residential streets

- 10.12.19 Objections have been received that the loss of parking would result in commuters seeking car parking spaces in the roads immediately adjacent to the existing CPZ boundaries. If they chose this option, then residents in those areas where this additional parking occurs are likely to campaign for extensions of the CPZ.
- 10.12.20 It can be assumed that the development will lead to an increase in pedestrian / bus/ cycle trips to the station. Further, it is more likely that trips will fall, with some commuters using alternative routes to work as it becomes too inconvenient to park close to the site due to the existing CPZ. There is therefore a level of confidence in assuming commuters will not park and walk through the existing CPZ based on the travel distances involved. The Controlled Parking Zone already would mean walking distances that are unlikely to be desirable and would be less preferable to alternative options. It should be noted that whilst 500m is the "desirable" distance to walk from outside a CPZ to a place of interest (Providing for Journeys on Foot, Institute of Highways and Transport, 2000), the actual distance on foot to walk from the 500m radius from the site is likely to be above 500m due to the indirect routes.
- 10.12.21 In addition, there is a lack of parking outside of the CPZ and many roads have footway crossovers, and parking is limited. There are also barriers such as the A406, making navigation difficult. Officers consider the existing combination of wider site characteristics mean displaced parking is unlikely.
- 10.12.22 Nevertheless, survey measures will be secured enable the Council to monitor the situation. These surveys will include data showing the baseline level of parking currently taking place outside of the CPZ; these results can then be compared with further surveys undertaken once the car park is lost. Officers have secured mechanisms with the Section 106 legal agreement to monitor this and if necessary, seek mitigation from the developers in order to address any unanticipated impact. These mechanisms include reviewing and monitoring car parking in the local area to identify if the development is resulting in car parking displacement to neighbouring streets. Should this be found to be the case, a financial contribution will be sought from the developers to facilitate corrective action, including changes to the existing Controlled Parking Zone.

Car-free residential scheme

- 10.12.23 The site is situated directly adjacent to a tube station and bus interchange providing a very robust case for a car-free development. This is a unique site, where the walking distances involved in accessing a tube station would be equivalent to accessing any resident car parking, were it proposed within the scheme. The site is also located within/adjoining a local centre, with existing amenities which would provide convenience retail directly adjoining the site.
- 10.12.24 The proposed car-free aspect of the residential development is considered acceptable, given the location of the site, directly adjacent a tube station and bus interchange with bus routes serving a wide catchment area and the site's location in an existing CPZ area and near shops.
- 10.12.25 A restriction of parking permits will also be secured in the Section 106 legal agreement meaning that future occupiers of the development would not be issued parking permits for parking within the existing Controlled Parking Zone. The developers have confirmed that this would be further reinforced through tenancy contracts.
- 10.12.26 On site provision will be made for Blue Badge residents car parking and to replace the existing provision. The eleven disabled parking bays all meet the minimum dimensions and can be accessed and egressed in a forward gear. Electric car charging points will also be available within the blue badge holder spaces.
- 10.12.27 Officers are therefore confident robust package of disincentives and incentives would be in place / secured through s106 to ensure car-free approach is supportable. The disincentives for residents to own a car or choose car travel include: the existing CPZ (distance required to park outside); s106 obligations with potential to secure potential CPZ extension; restrictions on parking permits. Incentives to choose sustainable options include the sustainable location of the proposals (adjoining station and interchange with very good services); the site's location near shops (facilities); and the s106 package negotiated to incentivise residents to use sustainable travel options.

Existing pedestrian and cyclist safety

- 10.12.27 Representations have been received raising concerns about security, including concerns from those who currently drive and park near the station because they may feel vulnerable walking on the streets rather than driving to the station. One of the aims of the Mayor of London (Mayor's Transport Strategy) approach, reducing car-reliance and encouraging non-car travel, is to promote feelings of safety and security increasing activity, including pedestrian footfall.
- 10.12.28 The proposal will introduce a permanent population to the site, with increased footfall between the proposal and surrounding areas.

Existing highway safety

- 10.12.29 Representations have been received raising concerns in respect of road accidents within the vicinity of the site, including requests for traffic calming along Bowles Road to reduce road accidents.
- 10.12.30 The Applicant has submitted a review of the Transport for London collision data for the area within their submitted Transport Assessment (for the five-year period available up to 31 December 2018). The details show that out of 65 collisions within the study area, that 64 of these collisions are considered resultant of driver error 27 accident being due to drivers failing to look properly, 19 accidents being due to drivers being careless / reckless / in a hurry. One collision was identified as being potentially influenced by the highway layout. This collision was not within the site frontage, occurring on Oakleigh Road South junction with Friern Barnet Road.
- 10.12.31 The Mayor of London's Vision Zero Action Plan focuses upon reducing road danger, including deaths and injuries, on London's roads and streets. This aims to make London a safer and healthier place that promotes Active Travel. The site is currently a car park with high vehicle flows in, out and within the area, and therefore people walking may feel unsafe and worry they could be involved in a collision with a motor vehicle.
- 10.12.32 The Applicant undertook a car park survey in 2019 which indicated that 834 two-way vehicle movements occurred on an average weekday, with a corresponding peak utilisation of 75%. Removing the car parks at Arnos Grove would result in a reduction of approximately 725 journeys within this vicinity.
- 10.12.33 A user survey was undertaken at Arnos Grove car park and this showed that 68% of the car park users lived with walking distance of a bus route that serves Arnos Grove Station. Therefore potentially 68% of the 834 two-way daily movements could have been undertaken by bus, which equates to 567 daily bus trips.

Active Travel Zones and Healthy Streets

- 10.12.34 A Healthy Streets Design Check is a requirement of the London Plan (Intend to Publish) Policy T2. This requires developments to reduce the dominance of vehicles and deliver improvements that support the ten Healthy Streets Indicators.
- 10.12.35 The submission documents confirm that a Healthy Streets Design Check has been undertaken as required by London Plan and found that the Proposed Development result in a 24% increase in the Healthy Streets score from an average of 53% to 77%. Key improvements result from the provision of a new public square including benches and green space, providing opportunities for social integration and recreation and improvements to the streetscape. Indicators with the highest improvement score include shade and shelter, and places to rest.

Vehicular Access

10.12.36 Access is provided from two revised access points: one on the east and one on the west. The access points have regard for visibility splays from the 'Manual for Streets' standards which require a 43m visibility splay either side

of the access, from 2.40m behind the access. These are shown on the plan AG-102384-T-102 of the submitted drawings. These access points are considered acceptable in principle.

Servicing and Delivery

- 10.12.37 The submission documents include a Delivery and Service Plan (DSP) which contains relevant detail in relation to how the site will be serviced via service roads for refuse & deliveries etc. Both sides of the Site will be serviced by the access roads running through the Proposed Development. The DSP shows the tracking diagrams for deliveries from a transit van, which can enter the site from Bowes Road and turn and exit in a forward gear. The tracking also includes a fire tender, which is the largest vehicle likely to require access, and therefore confirms that future large refuse vehicles can also access and egress the site.
- 10.12.38 As the site is car free, deliveries are likely to be required more frequently than for sites where parking is provided. The Transport Assessment includes delivery estimates based on a similar type of development in the applicant's portfolio elsewhere. The delivery estimates are as follows:

Table 6: Delivery trip estimates

Trip Generation						
Time Period	ln	Out	Total			
08:00 - 09:00	1	2	3			
17:00 – 18:00	2	2	4			
Daily	11	12	23			

- 10.12.39 Based on these figure deliveries are not expected to be significantly high, and it is noted that the site makes an allowance for delivery vehicles to access and turn within the site. This consideration is welcomed as the site is based on a busy classified road and forcing delivery vehicles to park on the highway would not be acceptable.
- 10.12.40 Whilst the figures are noted as being quite low in absolute terms, it is considered the layout of the site could accommodate occasional increases in the number of predicted deliveries if required.
- 10.12.41 The front of the site outside the station will remain functioning as a bus interchange. There are some alterations proposed, which have been reviewed and agreed by TFL and satisfies the Council's Traffic & Transportation team. It is noted the changes are to relocate the bus stop and taxi bays, and to shorten the length of the existing stopping area to facilitate more public space.
- 10.12.42 Some level of concern is noted in relation to vehicles still attempting to park at the station for drop offs. Whilst this will need to be controlled within the bus interchange by enforcement measures, there may be a wider impact of vehicles dropping off elsewhere but close to the station. This impact will be monitored post implementation and this monitoring will be secured within the Section 106 legal agreement.

Car Club

10.12.43 Other measures that will be secured by the Council through the Section 106 legal agreement will be a financial contribution towards the provision of a car club to provide access to shared mobility options. The provision would be dealt with through a fund provided by the applicants and comprise a fund of up to £15k being made available by the applicant to fund car club membership fees for residents during the first 3 years following first occupation.

Cycle Parking Provision

- 10.12.44 The Development will provide 288 residents cycle parking spaces and 22 station and visitor cycle parking spaces within the Site in locations which are secure and accessible.
- 10.12.45 The station already has a provision for 22 spaces, and the submission documents note that recently a further 16 spaces have recently been provided in a cycle hub outside the site. As part of the station development, a commercial unit will be provided. It is expected that some linked trips may exist between the station and the commercial unit, however London Plan requirement is 6 spaces (short stay) and 1 space (long stay) for the retail, and 3 spaces (short stay), and 1 space (long stay). In total, there will be 46 stands (2 spaces per stand) provided in the new square close to the station.
- 10.12.46 The Transport Assessment states that when broken down, this leaves 6 spaces for the commercial unit, and 40 spaces for the station (Paragraphs 3.30, 3,31). This is acceptable in principle however it is noted that the long stay cycle storage is for staff, and as such will be subject to a planning condition requiring further detail including detail of how the spaces will be secure and reserved for staff.

Summary of Transport Considerations

- 10.12.47 The application proposes to replace the existing car parks on Sites A and B with a good quality car-free residential development in a highly sustainable location. The proposed car-free development on a Brownfield site in a highly sustainable location aligns with the aspirations of adopted and emerging planning policy, as well as to the Borough's commitment to becoming a carbon neutral borough by 2040.
- 10.12.48 The removal of car parking, and provision of infrastructure on site to support sustainable travel modes, such as walking, cycling and electric car charging will encourage a positive change to patterns of travel behaviour towards low and zero carbon modes, in line with current and emerging policy requirements.
- 10.12.49 In light of the above assessment it is considered that whilst there would be some level of impact during a transition from the existing car dominant situation towards a proposed more sustainable situation, this impact is not sufficient to render the proposal unacceptable.
- 10.12.50 Officers have scrutinised the submission documents and are satisfied that the proposed development is acceptable in terms of its impact on the local transport network, meeting policy requirements including Enfield DMD 45 and Core Policies 24, 25 and 26; current London Plan Policy 6.1; and emerging

London Plan Policies (Intend to Publish) T2, T6 & T9 and, where necessary, providing appropriate mitigations. As also mentioned above the Section 106 agreement will include clauses for surveys to ensure any post-construction impacts are reviewed and mitigated where necessary. The development does not raise any issues which would be significantly prejudicial to highway safety or the free flow of traffic on the public highway and according to trip rate forecasts, will have a positive impact on the number of vehicle trips. The detailed Section 106 requirements are listed towards the end of this report.

8.11 Trees and Metropolitan Open Land

- 8.11.1 Policy G7 of the London Plan (Intend to Publish) requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals.
- 8.11.2 Meanwhile Enfield Policy DMD80 stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect.
- 8.11.3 The Proposed Development will involve the removal of 45 trees. Of these, none are Category A and two are Category B. As 73 new trees will be planted, the Development will result in a net gain of 28 trees, which will mean an overall increase in tree canopy cover on the site in comparison to the existing situation.
- 8.11.4 The submission documents state that proposed below ground utilities and drainage infrastructure have been designed to avoid Root Protection Areas (RPAs) in order to protect the integrity of retained trees. Detailed protection measures have been provided in the submitted Arboricultural Method Statement. A condition is recommended ensuring the methods outlined in the submitted documents are adhered to on site, to ensure trees will be appropriately protected at all stages of development.

Conclusion of Trees

8.11.5 On the basis of an Arboricultural Method Statement being submitted the Proposal is considered to be acceptable in relation to trees and in line with relevant policies including Enfield Policy DMD80 and Policy G7 of the London Plan (Intend to Publish). It is also noted that substantial amounts of landscaping is proposed as part of the development. As such there will be an improvement resulting from this and from the gain in trees in terms of visual amenity and biodiversity benefits.

Metropolitan Open Land

8.11.6 A small area of land in the northern most part of Site A includes dense trees and shrubs and forms part of Metropolitan Open Land (MOL). The London Plan affords MOL the same status and protection as Green Belt and in alignment with this approach, Enfield Policies do not permit inappropriate development in MOL.

- 8.11.7 The Proposed Development does not include the construction of any buildings within the MOL designation however, there will be improved access to the area of MOL via an informal footpath with incidental play opportunity for children aged 5+.
- 8.11.8 As Paragraph 141 of the NPPF requires LPAs to plan positively to enhance the beneficial use of Green Belt (such as looking for opportunities to provide access to and recreation within them), this is considered acceptable in this instance.

8.12 Water Resources, Flood Risk and Drainage

- 8.12.1 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal erosion. Whilst the Environment Agency is responsible for developing a new national flood and coastal risk management strategy Lead Local Flood Authorities (LLFA), such as the London Borough of Enfield will have overall responsibility for development of a Local Flood Risk Management Strategy for their area and for co-ordinating relevant bodies to manage local flood risks.
- 8.12.2 London Plan (Intend to Publish) Policy SI 12 requires developments to ensure flood risk is minimised and mitigated and that residual risk is addressed. As the site is located within Flood Zone 1 the sequential test does not apply to the development.
- 8.12.3 The Proposed Development would result in a change of use to a 'More Vulnerable' use class (Flood Risk Table 2). This is considered acceptable in Flood Zone 1, without the requirement for the Exception Test to be passed, in accordance with Flood Risk Table 3 (vulnerability and flood zone 'compatibility') set out in the Planning Practice Guidance.
- 8.12.4 Meanwhile London Plan Policy 5.13 and London Plan (Intend to Publish)
 Policy SI13 relate to sustainable drainage whereby the preference is to
 reduce surface water discharge from the site to greenfield run off rates.
- 8.12.5 The Council's draft Local Plan sets out the Borough's ambitions in relation to growth until 2036. Policy SUS5: Surface Water Management notes the following overarching aims in relation to drainage and flood risk:
 - All major developments to implement Sustainable Drainage Systems (SuDS) to enable a reduction in peak run-off to greenfield run-off rates for the 1 in 1 year and the 1 in 100-year event (plus climate change allowance);
 - All major developments to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated to reduce peak flow volumes and rates in line with the requirements of this draft policy approach;
 - All other developments to maximize attenuation levels and achieve greenfield runoff rates where possible or increase the site's impermeable area;
 - Development to be designed to minimise flood risk and include surface water drainage measures to be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality, and safe environments for pedestrian and cyclists;

- All new outdoor car parking areas and other hard standing surfaces be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so;
- Living roofs to be incorporated into new development, to help contribute to reducing surface water run-off; and
- Where installed, SuDS measures be retained and maintained for the lifetime of the development and details of their planned maintenance provided to the Council.
- 8.12.6 Supporting these principles is Development Management Document Policy DMD 61 which requires a drainage strategy to be produced that demonstrates the use of SuDS in line with the London Plan discharge hierarchy. The policy requires the use of SuDS to be maximised with consideration given to their suitability, achieving greenfield run off rates, the SuDS management train and to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value.
- 8.12.7 As well as the above policy the Council sets out further advice in its Flood Risk guidance which outline strategies for the mitigation of flood risk, management of surface water including the implementation of Sustainable Urban Drainage Systems (SuDS) on new developments, with allowances for the impact of climate change. The guidance recommends that the relevant documents are i) Preliminary Flood Risk Assessment, ii) Surface Water Management Plan, iii) Strategic Flood Risk Assessment (Levels 1 & 2), iv) Local Flood Risk Management Strategy, and v) Sustainable Drainage Design and Evaluation Guide.
- 8.12.8 Lastly the CIRIA C753 'The SuDS Manual' 2015 includes up-to-date research, industry practice and guidance in relation to delivering appropriate SuDS interventions including information on measures to deliver cost-effective multiple benefits relating to technical design, construction and maintenance of SuDS systems.

Assessment

- 8.12.9 The submission documents include a Flood Risk Assessment (produced by Aecom, dated March 2020) assessing all possible sources of flood risk in relation to London Plan Policy 5.12 and London Plan (Intend to Publish) Policy SI12. This assessment states that the site is at a low risk of flooding from all sources. A Surface Water Drainage Strategy and Foul Drainage Strategy have also been included within the accompanying Drainage Strategy.
- 8.12.10 Whilst it is noted that the applicants support surface water pumps as the preferred discharge option, the application submission does not currently provide sufficient information to demonstrate that a gravity sewer connection has been sufficiently explored. In addition, robust reasons for not discharging to a gravity sewer have not yet been provided to the satisfaction of the Council. As a gravity sewer connection is the most long-term sustainable solution, a planning condition is recommended requiring robust investigation into the potential for this to be explored and for details of this to be submitted to the Council.
- 8.12.11In addition to the above the proposal will necessitate the removal of a large proportion of the existing car park hardstanding, which will result in the

- impermeable area within the Site decreasing. In order to try and offset this the development proposes to incorporate areas of green roof, soft landscaping and permeable paving which is welcomed.
- 8.12.12 The application includes a Landscape Strategy (revised September 2020) which details proposed Sustainable Drainage Systems (SuDS) interventions such as 50% green roofs, rain gardens, swales and permeable paving which is welcomed by Officers. A planning condition requiring further investigation into SuDS measures including the feasibility of a gravity sewer connection and the feasibility of rainwater harvesting on site, is recommended.

Summary of Water Resources, Flood Risk and Drainage

8.12.13 Notwithstanding the above, and subject to planning condition/s pertaining to the submission of a Sustainable Drainage Strategy to include details of the sustainable management of waste; minimisation of flood risk; minimisation of discharge of surface water outside of the curtilage of the property; and to ensure that the drainage system will remain functional throughout the lifetime of the development, the proposal is considered to be in accordance with Policy CP28 of the Core Strategy, DMD Policy 61, and Policies 5.12 & 5.13 of the London Plan and the NPPF.

8.13 Environmental Considerations / Climate Change

- 8.13.1 The NPPF maintains the presumption in favour of sustainable development, including environmental sustainability, and requires planning to support the transition to a low carbon future in a changing climate (Para.148). This entails assisting in reducing greenhouse gas emissions, minimising vulnerability, encouraging the reuse of existing resources and supporting renewable and low carbon energy infrastructure.
- 8.13.2 Meanwhile London Plan (Intend to Publish) Policy G1 acknowledges the importance of London's network of green features in the built environment and advocates for them to be protected and enhanced. The Policy notes that green infrastructure 'should be planned, designed and managed in an integrated way to achieve multiple benefits'. Also of relevance is Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.
- 8.13.3 Paragraph 150 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. Meanwhile the London Plan (Intend to Publish) and Enfield Issues and Options Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

Energy and Sustainability

- 8.13.4 Currently, all residential schemes are required to achieve net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The same target will be applied to nondomestic developments when the new London Plan is adopted.
- 8.13.5 The NPPF (Para.153) requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping.
- 8.13.6 Policy SI2 of the London Plan (Intend to Publish) sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development). Meanwhile Policy DMD55 and paragraph 9.2.3 of the London Plan (Intend to Publish) advocates that all available roof space should be used for solar photovoltaics.

Assessment

- 8.13.7 An Energy Statement and a Sustainability Statement have been prepared by Aecom which provide an overview of the energy and sustainability strategies for the Proposed Development. The documents demonstrate how the proposal has sought to meet London Plan requirements and relevant Council policies.
- 8.13.8 In order to reduce the energy consumption of the development and to assist in achieving a compliant scheme, the Energy Statement states that measures pertaining to energy efficiency; overheating and cooling; decentralised energy; and renewable energy need to be incorporated into the detailed design.
- 8.13.9 The Proposed Development has sought to follow the London Plan (Regulated Carbon Emissions Reduction Priority) hierarchy. To that end passive efficiency measures have been introduced in the proposals through a high standard of fabric (including highly insulated walls, floor and roofs, efficient glazing and high levels of air tightness) and energy efficiency specified to reduce energy demand, CO2 emissions as well as reduce running costs for future occupiers.
- 8.13.10The Carbon Emission Reduction Model demonstrates that target emission reduction from the baseline (Part L 2013) can be exceeded through the proposed energy efficiency measures and can achieve the 10% / 15% carbon reduction targets as required by London Plan (Intend to Publish) Policy SI2.
- 8.13.11The applicants are currently liaising with Energetik with the intention of connecting to the District Energy Network (DEN). At the time of writing this report correspondence between the parties is ongoing and an agreement to connect to the DEN is being actively pursued. The Arnos Grove Heat Network is currently served by an energy centre that generates heat using Gas Combined Heat and Power and boilers. The network connection is proposed in accordance with the requirements of Policy S13 of the London Plan (Intend to Publish) and Council policy DMD52 which require major development to connect to existing heat networks unless there are feasibility or viability

- reasons not to. The expected carbon emission reduction from connection to the DEN is 26% which is considered a substantial efficiency.
- 8.13.13It is recommended that s106 planning obligations be secured in line with adopted Enfield DMD Policy 52 and the requirements of Enfield's adopted Decentralised Energy Network Technical Specification SPD. The Applicant is actively considering and pursuing connection to the planned Energetik District Heat Network (DHN). An alternative fall-back strategy, based on Air Source Heat Pumps (ASHP), is also being considered. A carbon off-set contribution is recommended to be secured by way of s106 of between £139,847 £194,731.
- 8.13.14The submitted Energy Strategy sets out that CO2 emission reduction would also be achieved though the installation of photovoltaic panels (PV) on 130 sq.m of roof area across the development. The submitted information details that 69% of the flat roof area across the Proposed Development will not be suitable for PV installation due to the need for setbacks, plant, machinery and other roof equipment, and shaded areas. Notwithstanding the combined energy efficiency measures are expected to achieve a reduction of 42% in regulated CO2 emissions which exceeds the minimum London Plan (Intend to Publish) target of 35% and meets Enfield policy requirements.
- 8.13.15During the course of the application (pre and post-submission) the applicant has continued to work with the GLA's Energy Team to respond to GLA comments on the proposal in Energy terms. The proposal is considered acceptable in terms of energy and sustainability.

Ecology and Biodiversity

- 8.13.16The NPPF (Para.170) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. Meanwhile London Plan (Intend to Publish) Policy GG2 requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan (Intend to Publish) Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. Enfield Core Policy 36 requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy GI4 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough.
- 8.13.17Within a more strategic context the Environment Bill, published by the UK Government in October 2019 includes proposals to make biodiversity net gain (BNG) a mandatory requirement within the planning system in England. Should the Environment Bill be passed in a form similar to that introduced in October 2019, developments such as this will be required to achieve a 10% gain in biodiversity units relative to the development site's baseline biodiversity.
- 8.13.18The Site is adjacent to a Site of Borough Importance for Nature Conservation (SINC), within which sits a Wildlife Corridor along the Piccadilly Railway Line tracks. Currently the existing site is considered of low biodiversity and

- ecological value, with the exception of vegetation to the periphery of the site, and an area of woodland to the north of Site A.
- 8.13.19The Proposed Development will not result in the disturbance of any existing habitats. In addition, the scheme has been designed with the protection and enhancement of the habitat and biodiversity within and adjacent to the site, in mind. To that end planting has been selected to maximise biodiversity value and features native or near native species which will help to reinforce the established nature of the adjoining SINC.
- 8.13.20When measured against Natural England's Biodiversity Metric 2.0 Calculator, it was found the proposed development would result in a 30.80% biodiversity net gain which exceeds requirements of the forthcoming Bill by some margin. Furthermore, this demonstrates compliance with the requirements of the NPPF (Para 170) and London Plan (Intend to Publish Policy G6) in relation to development delivering biodiversity net-gain.

Climate Change

- 8.13.21Recent data from the Met Office indicates key climate projections for the UK are summers becoming hotter and drier; winters becoming milder and wetter; soils on average becoming drier; snowfall and the number of very cold days decreasing; rising sea levels; and storms, heavy and extreme rainfall, and extreme winds becoming more frequent.
- 8.13.22As mentioned above Paragraph 150 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. Also as mentioned above, in July 2019 a state of climate emergency was declared by the Council's Cabinet which committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan focus on energy, regeneration, economy, environment, waste and health.
- 8.13.23Meanwhile, the London Plan (Intend to Publish) and Enfield Issues and Options Plan both make reference to the need for development to limit its impact on climate change while adapting to the consequences of environmental changes. The London Plan's ambitions look to lead the way in robustly addressing climate change by moving towards a zero-carbon city by 2050.

Assessment

- 8.13.24The Proposed Development incorporates a number of measures and philosophies which align with a larger and wider drive to address climate change. These include as follows:
 - removing the opportunity for and subsequently reducing the reliance on private motor vehicles, and as such easing traffic and congestion; and
 - demonstrating via a high score against 'Healthy Street' indicators that the
 Development would provide an overall improvement in the local environment

 this will have the knock-on effect of encouraging and assisting Londoners to
 use cars less and walk, cycle and use public transport more.
- 8.13.25The above measures would as a result reduce the use of cars or polluting

- vehicles and emission of greenhouse gases (i.e. carbon dioxide, methane and nitrous oxides) which contribute to climate change.
- 8.13.26In addition, by contributing to local green infrastructure through new planting, green roofs and a net gain in tree coverage which all support biodiversity and reduce the urban heat island effect. These green networks will connect to existing ecological corridors and open spaces, particularly along the Piccadilly Line railway tracks.
- 8.13.27As well as these measures the layout of the Development includes passive design strategies to reduce energy consumption and proposes the use of efficient processes and appliances, energy efficient fabric, insulation and glazing, as well as efficient lights, hot water storage and mechanical ventilation with heat recovery. A connection to the District Energy Network and the addition of 130 sq.m of PV roof panels will further reduce energy consumption and raise the eco credentials of the Development and wider Site.

Conclusion of Environmental Considerations

- 8.13.28The Proposed Development is considered to meet national, London and local policy requirements which seek to ensure developments protect and enhance the natural environment. As well as the measures outlined above, as noted elsewhere in this report the development will be car free which would mark a significant milestone towards addressing climate change by removing the opportunity for and subsequently reducing the reliance on private motor vehicles.
- 8.13.29The proposal supports London and local action plans to mitigate climate change, minimising its impacts and ensuring development is resilient to its effects. It employs strategies such as promoting sustainable travel, removing cars from the road, proposing efficient systems and energy consumption reduction measures as well as enhancing and expanding the green infrastructure network.
- 8.13.30Whilst the Development seeks to account for the likely future extreme weather events such as higher temperatures and more rainfall, the Council are seeking further measures in the way of drainage and SuDS intervention as outlined earlier in the report. With the above taken into consideration, the proposal is considered to be acceptable in terms of environmental considerations and in line with relevant policies including DMD51, 52, 53, 54, 56, 78, 79; CS Policies 20, 32 & 36; existing London Plan Policies 5.1, 5.2, 5.5, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12 & 5.13; and London Plan (Intend to Publish) Policies G6 & S12.

8.14 Waste Storage

- 8.14.1 The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. Policy SI7 of the London Plan (Intend to Publish) encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste.
- 8.14.2 Meanwhile Enfield Core Policy 22 (Delivering Sustainable Waste

Management) sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.

Construction Waste

8.14.3 The Proposed Development will not involve the demolition of any buildings and generated construction waste will amount to the surfacing of the car park and other minor detritus. The submission documents state that waste management during construction will be in line with the waste hierarchy in order to minimise do far as possible, the amount of waste being sent to landfill or similar disposal routes.

Operational Waste

8.14.4 Paragraph 5.2.7 of the submitted Design and Access Statement outlines proposed refuse and recycling arrangements for the development as follows:

Residential:

- Bin stores have been designed as secure rooms located at ground floor, with external street access and have been located close to residential entrances or set deep into the plan;
- Block A02 and B02 have lobbied pedestrian entrances for refuse drop off.
 Bins are taken out via a separate louvred door, orientated away from residential entrances; and
- Collection will take place from within the development with refuse vehicle turning heads located to the south of A02 and B02. All collection points are within 10m of bin stores.

Commercial Unit:

 A small refuse and recycling store facility is located to the east of A01 and will be served via kerb side commercial collection with future tenants of the commercial unit overseeing their own collection arrangements.

LUL Bins:

- Arnos Grove station is the terminus for some trains. Six no. Euro bins are currently located on site B and are required to be reprovided. Bins are located to the western side of B01 and accessed via a service entrance from the public realm to the south.
- 8.14.5 In order to ensure that operational waste requirements, including access arrangements for waste vehicles and base calculations of bin numbers for waste storage and dedicated recycling bins required for the dwellings are met, a planning condition requiring a Waste Strategy to be submitted to the Council for approval is recommended.

Conclusion

8.14.6 On the basis that the Development will seek to minimise waste generation as much as is feasible during both the construction and operational phase and use sustainable construction and waste disposal methods as much as possible in accordance with the Development Plan, it is considered that no significant adverse effects in respect to waste management would arise as a

result of the Proposal, and the Proposal would be in line with relevant Policies including DMD 49 & 57; CS 22; existing London Plan Policy 5.18; and London Plan (Intend to Publish) Policy S17. This is also subject to a planning condition requiring a Waste Strategy which should include details of the frequency of collections, to be agreed by the LPA prior to the development becoming operational.

8.15 Contaminated Land

- 8.15.1 The current carpark setting matches the latest map of the area with approximately 90% of the Site covered with asphalt, with the remaining 10% occupied by grass and mature trees. The submitted Contamination Report identifies no significant potential sources of contamination.
- 8.15.2 The Site remained undeveloped until 1932 when Arnos Grove Station was built. Historical OS map from 1936 identifies the construction of Arnos Grove Station and railway lines passing between the two parts of the Site (i.e. today western and eastern carparks). The carpark development is shown in 1950-1951 with it occupying the present territory from 1971.
- 8.15.3 The geology of the area just outside the north site comprises River Terrace Deposits overlying London Clay Formation. Lambeth Group, Thanet Sands and White Chalk are expected to be present below London Clay and there is also likely to be Made Ground. The nearest watercourse is Pymme's Brook river situated 220 m from the site.
- 8.15.4 The site is directly underlain by a significant thickness of low permeability London Clay (construction is expected to terminate within this stratum) which is classified by the Environment Agency as Unproductive Strata. Given the absence of a classified aquifer directly beneath the site, groundwater is considered to be a low sensitivity receptor. Mapping produced by the EA and supplied with the Envirocheck report shows that the site does not lie within a Source Protection Zone and therefore the risk to groundwater as a resource from potential contaminating activities is reduced.

Conclusion of Contaminated Land

8.15.5 Subject to appropriate condition/s being attached requiring both compliance with submitted proposed measures and further details to be submitted in the way of a Remediation Strategy and a Verification Report, the Development is considered acceptable in terms of contaminated land and in line with relevant guidance including Paragraph 170 of the NPPF.

8.16 Air Quality / Pollution

- 8.16.1 London Plan Policies 3.2, 5.3 and 7.14 and London Plan Policy (Intend to Publish) SI1 set out requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 8.16.2 Meanwhile the NPPF (Para.103) recognises that development proposals which directly address transport issues and promote sustainable means of

- travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 8.16.3 Lastly Enfield Policy DMD 65 requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 8.16.4 Given the reduction in car traffic, proposed Energy Strategy and inclusion of electric car charging points the Proposed Development is considered unlikely to result in a negative environmental impact, including in terms of air quality and/or noise (Noise is also discussed elsewhere in this report).
- 8.16.5 The submission documents include an Air Quality Assessment considering the construction phase of the Proposed Development. The results of the assessment show that the modelled pollutant concentrations at all proposed receptors are below all relevant UK National Air Quality Strategy objective values and therefore the assessment concludes that the Site is considered suitable for the intended use.
- 8.16.6 The assessment further states that there are also no off-site impacts and therefore no contravention of planning policy. The assessment found there to be a medium to high risk of dust impacts during demolition and construction. Suitable mitigation measures have been recommended in this report to be included in a Construction Method Statement.
- 8.16.7 On the basis of the above and subject to recommended planning condition/s as outlined, the Proposed Development is considered to align with relevant Policy including Enfield Policy DMD 65; London Plan Policies 3.2, 5.3 and 7.14; and London Plan Policy (Intend to Publish) SI1, and as such is considered acceptable in terms of Air Quality/Pollution.

8.17 Socio-economics and Health

- 8.17.1 Based on the 2011 Census, the ward population for Southgate Green within the London Borough of Enfield Authority, was recorded as 13,787 with the number of households 5,154. Within that ward population the economically active (age 16-64 in full time work, part time work, self-employed, full time students or unemployed) is 73.4%, which is slightly lower than the England and Wales average of 76.8%.
- 8.17.2 The Proposed Development will result in the provision of housing, additional local spending by residents of the new development, and the provision of public and private amenity space and open space.
- 8.17.3 As the Development will provide good quality housing, a small level of employment opportunities by way of the round floor commercial unit in building A01 and access to amenity areas, potential positive effects on health are anticipated in regard to access to open space, crime reduction and community safety. Taking the above into consideration, overall it is considered that some positive environmental effects on socio-economics would arise as a result of the development. Furthermore, it is not considered there would be any significant effects on health occurring as a result of the development.

8.18 Education

- 8.18.1 Policy S3 of the London Plan (Intend to Publish) seeks to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and notes that needs should be assessed locally and sub-regionally.
- 8.18.2 Meanwhile Enfield Local Plan Core Policy 8 sets out that the Council will contribute to improving the health, lives and prospects of children and young people by supporting and encouraging provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough.
- 8.18.3 The Council's Section 106 Supplementary Planning Document (SPD) sets out that LBE will seek financial contributions for education at a rate of £2,535 per dwelling regardless of unit size. However, in the context of education contributions, the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, education obligations are not justified in terms of tests set by Regulation 122.

Child yield

- 8.18.4 The total population and number of children expected to live in the Proposed Development has been calculated using the GLA Population Yield Calculator (v3.2 October 2019). For the purposes of the application the applicants have manually adjusted the age brackets to align with primary and secondary educational years.
- 8.18.5 For the Proposed Development a PTAL rating of 5-6 is assumed (the Site is located within PTAL 6a) and classified as 'London' (normally this location would be considered to be 'Outer London' however due to the small sample size of outer London developments that are in PTAL 5-6, this option is excluded from the model).
- 8.18.6 The projected gross child yield is set out in the Table below. Table 7: Projected child yield arising from the Development

	Projected number of people
Total population yield	305
Total child yield (up to 16 years)	26
Children under 4	14
Children of primary school age (age 4-10)	9
Children of Secondary school age (age 11-15)	2
Children of sixth form age (16-17)	1

^{*} Figures do not sum due to rounding.

- 8.18.7 The submitted information indicates the Development Child Yield will be 9 primary school age children, 2 secondary school age children, and 4 further/sixth form age children.
- 8.18.8 Using the GLA Population Yield Calculator (with the applicant adjustments as mentioned above), the estimated population number generated by the Proposed Development is 305. Of this number, it is expected that there will be 26 children under 16 years of age made up of nine children of primary school

- age (4-10), two children of secondary school age (11-15) and 14 children under the age 4 of which a proportion may need local childcare.
- 8.18.9 It is noted that these projections are gross population yields and that some families may already live in the area and may already have a place at a local school. Additionally, not all children under 4 would be expected to need a place in an early years setting, and it would also be expected that most children who do, will take a part-time place. Based on the assumption that of those places that are part time, only part of the week or part of each day which will be utilised, it is assumed that one physical place in an early years setting can provide a part time place for more than one child.

Primary School

- 8.18.10 Officers have undertaken a detailed assessment of the potential child population, primary and secondary school surplus, latest forecasting information on school places in the context of Regulation 122 (Community Infrastructure Levy Regulations) tests. Regulation 122 sets out limitations on the use of planning obligations with which the planning authority must comply. It states: (1) This regulation applies where a relevant determination is made which results in planning permission being granted for development; (2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- 8.18.11The scheme is estimated to house an estimated 9 primary school age children. There is evidence, in respect of this specific site and the appropriate catchment, of sufficient primary places (the current combined surplus capacity at the primary schools within 1km of the Site is approximately 10%). Whilst it is standard practice to maintain a surplus capacity of 5% in schools to accommodate mid-year admissions and facilitate parental choice, an estimated 10% surplus indicates that there is likely to be capacity within local primary schools
- 8.18.12In the context of education contributions, this means that the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, this means that education obligations would not be justified under the terms of Regulation 122.
- 8.18.13The Infrastructure Planning team has confirmed that the evidence presented, including the modest child population likely, that it would not be proportionate, reasonable or necessary to request an education contribution in this specific case, on this specific site.

Secondary School

8.18.14With regards to secondary school places it is noted that when recent secondary school projections were published there was some level of uncertainty about the opening time of the Wren Academy at Chase Farm. However, as the school is now open, it there is no further deficit in school

places, as evidenced and assessed at this time. As such, it is expected that any secondary demand will be met by this school and the opening of the One Degree Academy (Secondary part) which is currently planned for September 2023.

8.18.15On the basis of the above information, and in the context of Regulation 122 the proposal is considered to align with relevant policy guidance including Enfield Local Plan Core Policy 8; and Policy S3 of the London Plan (ItP) and would not be considered give rise to an unmanageable or unacceptable scenario in terms of education provision to existing or future residents.

8.19 Fire Safety

- 8.19.1 In terms of fire safety, London Plan Policy D12 (Intend to Publish) requires developments to be designed to incorporate appropriate features to reduce the risk to life and Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users. A fire statement produced by a third party suitably qualified assessor, has been submitted as part of the application which satisfies London Plan Policy D12 (Intend to Publish). London Fire Service have confirmed that details provided in relation to Fire Brigade Access and the Council's Building Control Team are also satisfied with the proposals. Notwithstanding a condition is recommended
- 8.19.2 The applicant has stated that it is not possible to provide fire evacuation lifts within each building core because there is no on-site management and that it is safer for a disabled person to wait in the stair core. However, in residential developments where evacuation lifts are present the fire and rescue service will have safe provisions to facilitate a co-ordinated evacuation in line with the building's evacuation strategy and as such on-site management is not necessarily required. As such, a condition is recommended requiring a fire evacuation lift to be provided within each building core for the evacuation of wheelchair users and other less mobile occupants in line with the Policy D5 of the London Plan (Intend to Publish).

9.0 Equality Statement

9.1 London Plan Policy 3.1 and Policy GG1 of the Mayor's Intend to Publish London Plan highlight the diverse nature of London's population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies. including the Council, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

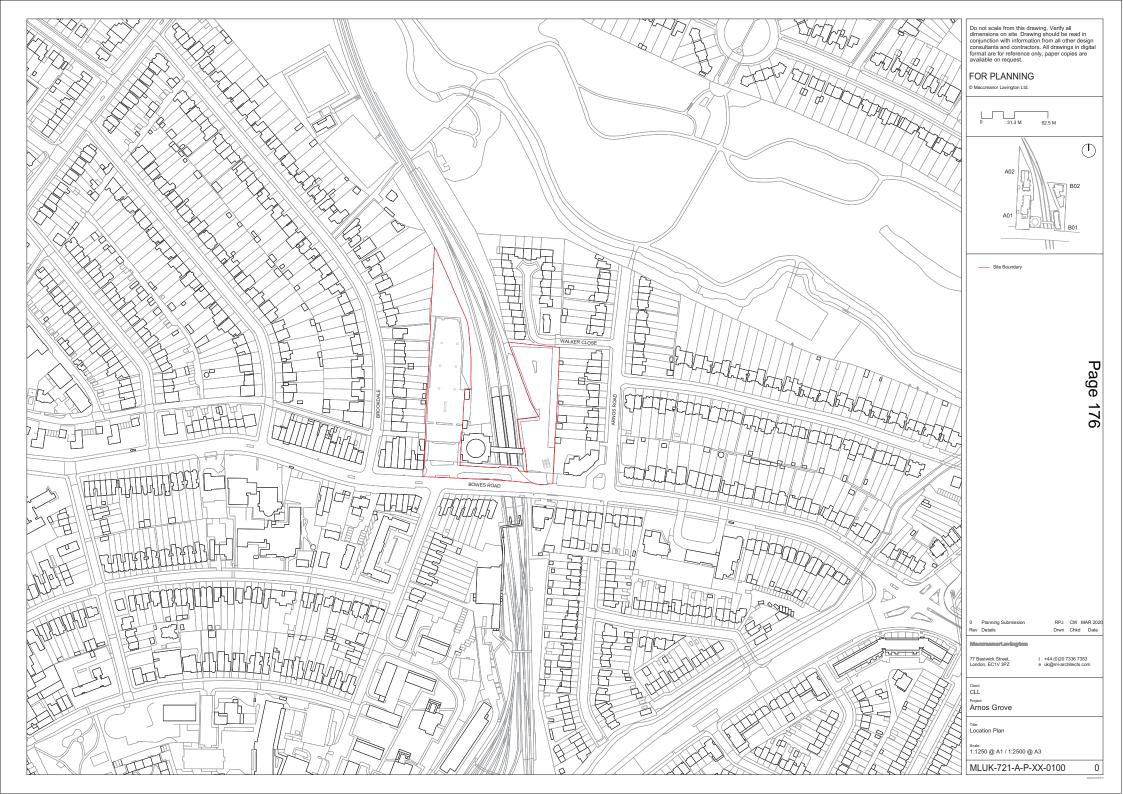
10.0 Community Infrastructure Levy

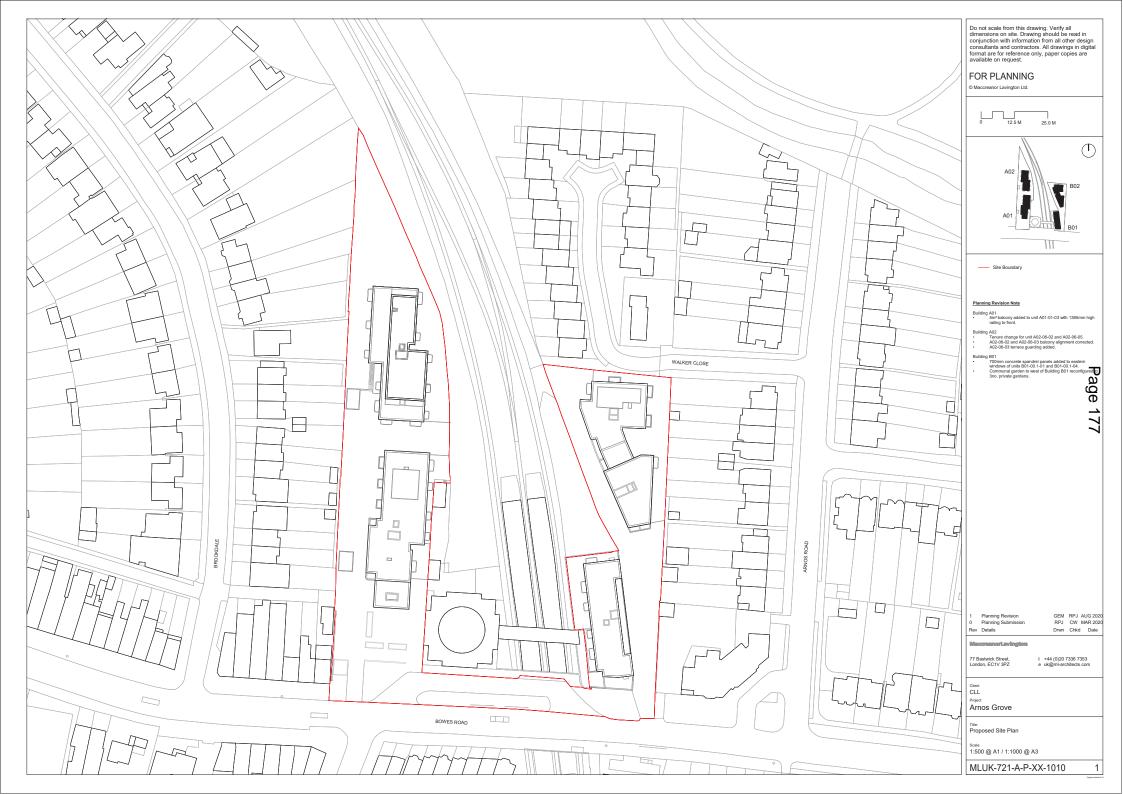
10.1 Both Enfield CIL and the Mayor of London CIL2 would be payable on this scheme to support the development of appropriate infrastructure. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved. Based on the Mayor and Council's Charging Schedules, the total level of CIL is expected to be in the order of £1,765,181 (based on current details, certain scheme assumptions, indexation assumptions and inclusion of relief).

11. Conclusion

- 11.1 The proposed redevelopment of the car parks at Arnos Grove Underground Station has been developed in the context of the relevant local, London and national planning policy. The proposed Site is a brownfield site in a highly sustainable location at Arnos Grove Underground Station. As a previously developed site which is currently underutilised, the Proposed Development for housing is fully supported by policies for boosting the supply of homes (NPPF para 59, London Plan Intend to Adopt Policy GG2 and H1).
- 11.2 The Site has a PTAL rating of 4 (good) to 6a (excellent), being at Arnos Grove underground station which provides access to the Piccadilly Line, linking the site to most areas within the City and with a bus interchange at the front of the station. The well-connected Site aligns with Mayoral and emerging local ambitions of moving towards providing exemplary designed high density residential led developments in sustainable locations.
- 11.3 The delivery of 162 new homes will optimise the use of a sustainably located brownfield site and make an important contribution towards meeting both the Council's and the Mayor's annualised housing targets. The provision of 40% affordable housing (by habitable room) will meaningfully contribute towards local and strategic housing need and targets.
- 11.4 The Proposed Development is a design-led scheme which optimises development on the site, has been informed by the site's constraints and local character, and designed to respond positively to and minimise and mitigate impact on the Grade II* listed Underground Station. Whilst there is some level of impact resulting from the Development this is not considered sufficient to outweigh the public benefits of the scheme. The car free development, and provision of a new public square, will vastly improve permeability throughout the site, in stark contrast to the existing situation. It will also result in a shift away from the private car and encourage active travel and the use of public transport in line with the Mayor's Transport Strategy for Healthy Streets. The proposed buildings and public realm will have a positive impact on the immediate locality and introduce a contemporary style of architecture to the area that also responds positively to and complements the existing vernacular.
- 11.5 Optimisation of development on the site has also considered the requirements for residential space standards, private external amenity, play space and creating mixed and inclusive communities through the provision of wheelchair accessible and adaptable units, public transport accessibility and

- movement, impact on residential amenity, townscape and character and the adequacy of existing social infrastructure.
- 11.6 As a result of the above characteristics the proposal is considered to accord with the development plan as a whole, and as such it benefits from the statutory presumption in favour of the development plan as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004. This policy support for the proposal is further reinforced by its compliance with important other material planning considerations, such as the NPPF and the London Plan (Intend to Publish) to which, for reasons explained elsewhere in this report, significant weight has been attached. On the basis of the above, it is considered therefore, the Proposed Development aligns with relevant local, regional and national policy and as such is recommended for approval.





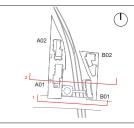


Strategic layout & Landscaped Buffers

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— Site Boundary

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0 Planning Submission Rev Details

RPJ CW MAR 2020

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Client

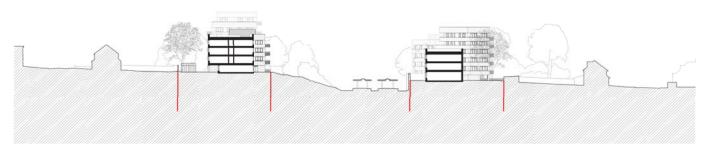
Project Arnos Grove

Proposed Site Elevations & Sections

Scale: 1:500 @ A1 / 1:1000 @ A3

MLUK-721-A-P-XX-1030

Proposed Site Elevation 1 - South



Proposed Site Section 2 - South

MLUK-721-A-P-A0-3100





0 Planning Submission Rev Details

RPJ CW MAR 2020 Drwn Chkd Date

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Client

Project Arnos Grove

Title: Bldg B01 Elevation - South

Scale: 1:100 @ A1

MLUK-721-A-P-B1-3130

0

Level 03 - B01 52650 AOD Level 02 - B01 49050 AOD Level 01 - B01 45900 AOD Level 00.1 - B01 42600 AOD Level 00.3 - B01 42000 AOD

Do not scale from this drawing. Verify all dimensions on site. Drawing should be read in conjunction with information from all other design consultants and contractors. All drawings in digital format are for reference only, paper copies are available on request.

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Planning Revision Note

Building A01

5m² balcony added to unit A01-01-03 with 1385mm high railing to front.

Building A02
Tenure change for unit A02-06-02 and A02-06-05.
A02-06-02 and A02-06-03 balcony alignment corrected.
A02-06-03 terrace guarding added.

Building B01

- Video of the Control of the Control

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Planning Revision
 Planning Submission

GEM RPJ AUG 2020 RPJ CW MAR 2020

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Client

Project Arnos Grove

Bldg B01 Elevation - East

Scale: 1:100 @ A1

MLUK-721-A-P-B1-3133



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MLUK-721-A-P-A2-3121

Client
CLL
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Arnos Grove
Tife:
Bidg A02 Elevation - West
Scale:
1:100 @ A1

Design and Access Statement: Extract (View north towards A02)

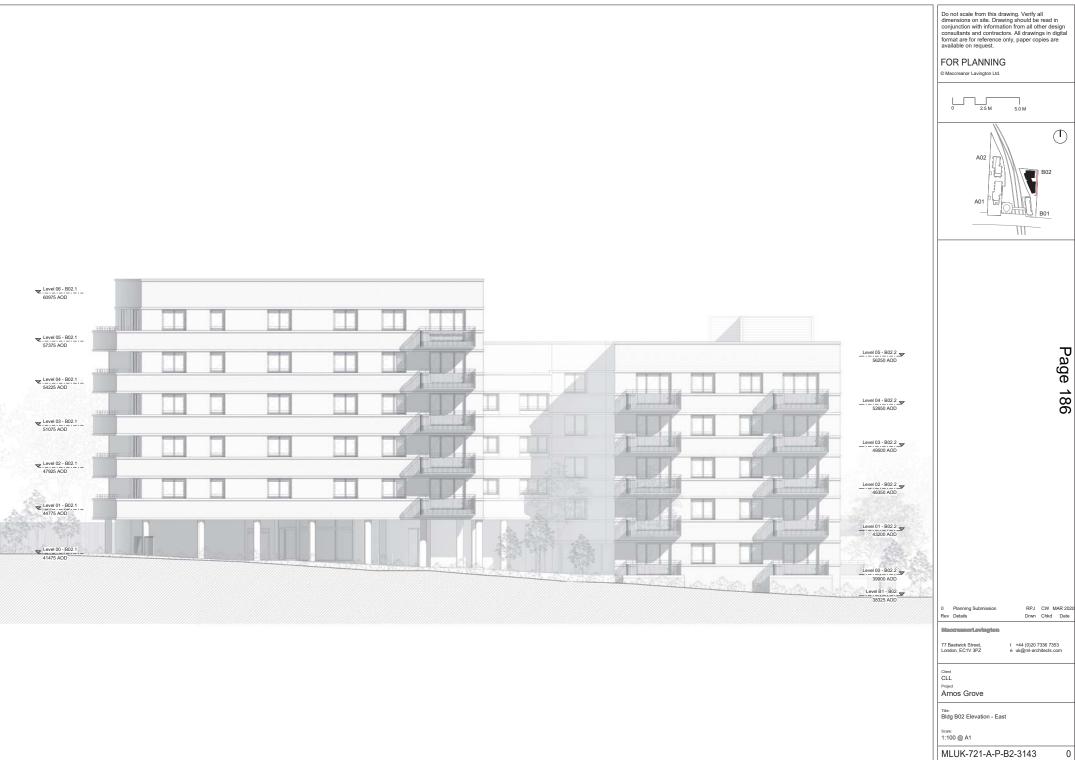


Site A 'Homezone' - View north to A02

Design and Access Statement: Extract (Materials and Details)



	Rem	Element Material
A	Principal Brickwork 01	Red / Orange handmade variegated clamp-fired stock facing brick, natural grey mortar.
1	Principal Brickwork 02	White/buff testured handmade waterstruck brick, flush white mortar
c	White Glazed Brickwork Blend	White / off white blend, white mortar tho
D	Pleth Brick	Staffordshire brindled blue brick, dark grey mortar
t	Precast bending - Sills, Lintels & Copings	Architectural precast - White grey, buff agrregate tbc
8.	Windows	PPC aluminium windows, RAL 7006 tbc
6	Entrance doors	PPC aluminium, dark bronze tbc
н	Refuse, Cycle store and Plantroom doors	PPC Steel louvred door, hot zinc dipped, dark bronze tho
1	Balcony and Balastrade Steel railings	PPC hat zinc dipped, dark brorze tbc
111	Glazed tile	Outsigood blend or Navy blend the





Proposed Site Elevation 3 - West



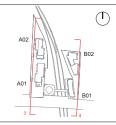
Proposed Site Elevation 4 - East

Do not scale from this drawing. Verify all dimensions on site. Drawing should be read in conjunction with information from all other design consultants and contractors. All drawings in digital format are for reference only, paper copies are available on request.

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— Site Boundary

Planning Revision Note

Building A01

Sm² balcony added to unit A01-01-03 with 1385mm high railing to front.

Building A02
Tenure change for unit A02-06-02 and A02-06-05.
A02-06-02 and A02-06-03 balcony alignment corrected.
A02-06-03 terrace guarding added.

Building B01

Töllerin concrete spandret panels added to eastern
windows of units B01-00.1-01 and B01-00.1-04.

Communit guerten to west of Building B01 reconfigured by
Sinc private guerdens.

1 Planning Revision 0 Planning Submission

GEM RPJ AUG 2020 RPJ CW MAR 2020

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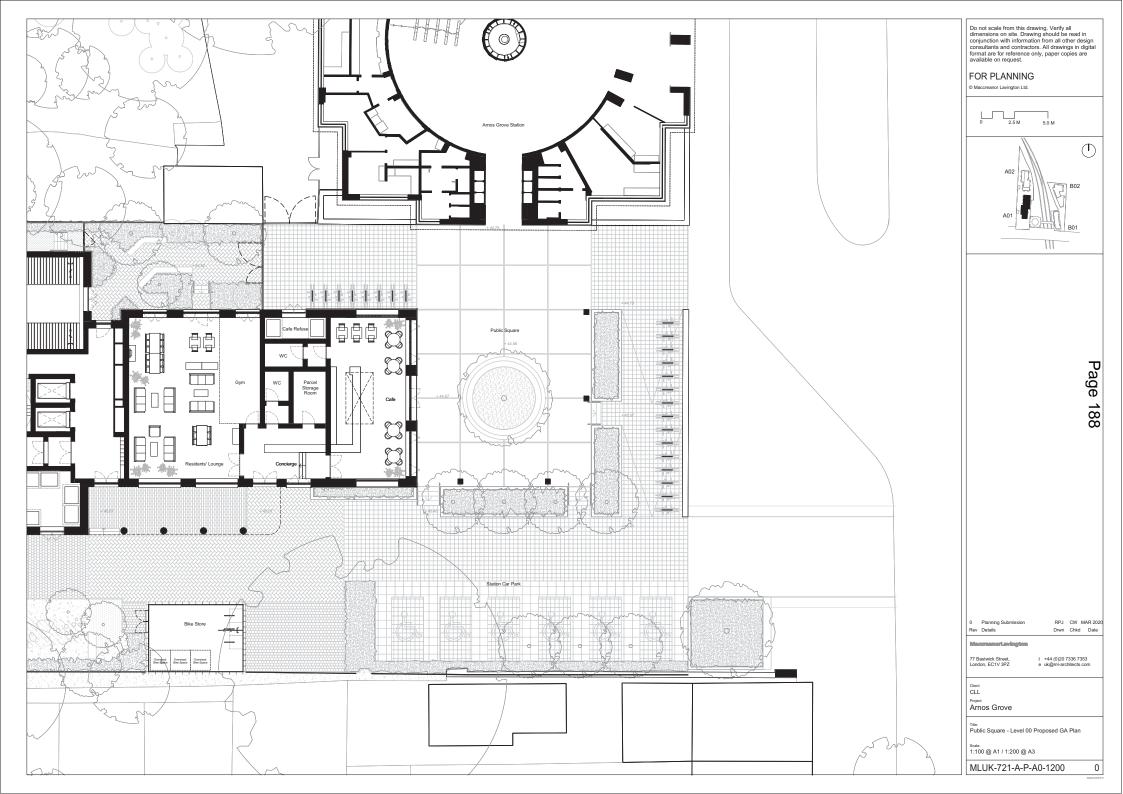
Client

Arnos Grove

Proposed Site Elevations & Sections

Scale: 1:500 @ A1 / 1:1000 @ A3

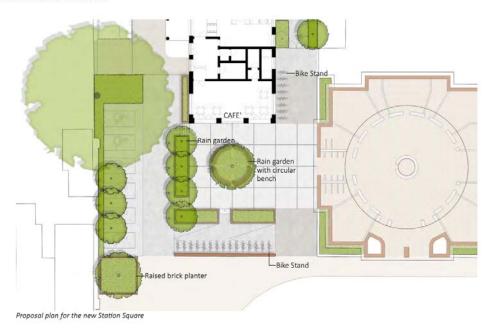
MLUK-721-A-P-XX-1031



Public Square

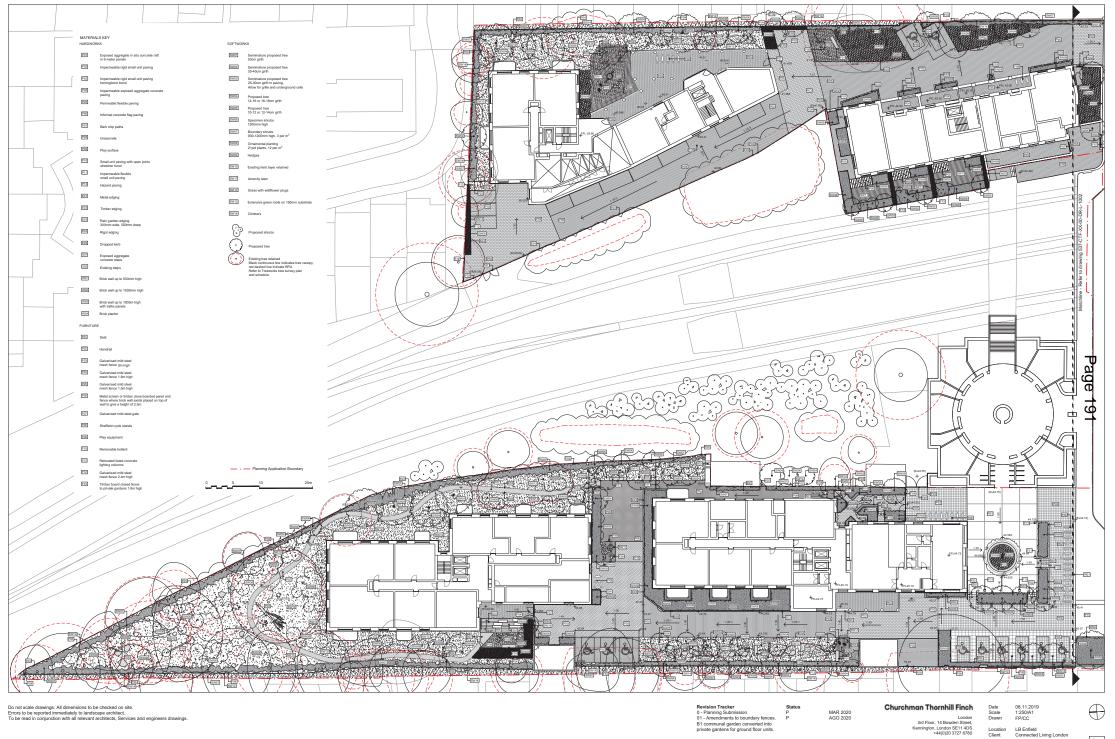


The new Station Square and access to residential blocks A01 and A02









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537-CTF-XX-00-DR-L-1000

Arnos Grove Landscape General Arrangment Plan

Revision 01

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LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 24 November 2020

Report of:

Head of Planning

Contact Officer:

Andy Higham David Gittens

Lap Pan Chong 020 8132 1920

Ward:

Cockfosters

Application Number: 20/02112/FUL

Category: Minor Dwellings.

LOCATION: 39A Camlet Way, Barnet, EN4 0LJ

PROPOSAL: Redevelopment of site and erection of 4 x single family dwellings with basement level accommodation together associated parking and refuse and recycling.

Applicant Name & Address:

Hero Camlet Villa Developments LLP 166 College Way HA11RA

Agent Name & Address:

Mr Alan Cox Alan Cox Associates 224a High Street Barnet EN5 5SZ United Kingdom

RECOMMENDATION: That the Head of Development Management/the Planning Decisions Manager be authorised to **GRANT PLANNING PERMISSION** subject to planning conditions.



1. Note for Members

1.1 Although a planning application of this scale would normally be determined by officers under delegated authority, the application is been reported to the Planning Committee for determination at the request of Councillor Alessandro Georgiou.

2. Recommendation

2.1. That the Head of Development Management/the Planning Decisions Manager be authorised to GRANT PLANNING PERMISSION subject to the following planning conditions:

1. Time limit

The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the decision notice.

Reason: To comply with the provisions of S.51 of the Planning & Compulsory Purchase Act 2004.

2. Accordance with plans

Unless required by any other condition attached to this Decision, the development hereby permitted shall be carried out in accordance with the following approved plans:

479318-10 479318-11 479318-12 Rev A 479318-13 Rev A 479318-14 Rev B

479318-15 Rev A

479318-16 Rev A

479318-17

Planning / Design and Access/ Sustainability Statement dated 07/20 Daylight and sunlight assessment (P115035-1001 Issue:1 dated 23 June 2020)

Energy Statement dated 14/07/2019

Bat Emergence and Re-entry Surveys dated 07/08/19

Sustainable Drainage Strategy (REF:19064/SUDs_R01/RS REV P2 2020.07.08)

Tree survey schedule

Phase II Arboricultural Impact Assessment (Ref: 101 131 Updated 17/09/2019 and received on 10/12/2020)

Tree Protection Plan dated 10/12/2020

Tree Constraints Plan dated 7/3/2018

GUA-Dr-L-001 Revision P03

Supplementary information – Mock-up view from first floor window of Plot 2

Indicative details of bricks

Reason: For the avoidance of doubt and in the interests of proper planning.

3. Windows

The glazing to be installed in the first-floor eastern, southern and western elevations (except the recessed window to master bedroom in the western elevation) of the new building of Plot 1, the first-floor northern elevation of new building of Plot 2, and first-floor eastern elevations of new buildings of Plots 3 and 4 shall be obscured to level 3 or above of the Pilkington Obscuration Scale and fixed shut to a height of 1.7m above the floor level of the room to which they relate. The glazing shall not be altered without the approval in writing of the Local Planning Authority.

Reason: To safeguard the privacy of the occupiers of adjoining properties.

4. No additional fenestration

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015, or any amending Order, no external windows or doors other than those indicated on the approved drawings shall be installed in the development hereby approved without the approval in writing of the Local Planning Authority.

Reason: To safeguard the privacy of the occupiers of adjoining properties.

5. Details of all materials

Prior to the commencement of development, details of all materials to be used on all external finishes, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason: To ensure a satisfactory external appearance.

6. Roof Not be Used as Balcony/Terrace

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015, or any amending Order, no balustrades or other means of enclosure shall be erected on the roof of the extension(s). No roof of any part of the extension(s) shall be used for any recreational purpose and access shall only be for the purposes of the maintenance of the property or means of emergency escape.

Reason: To safeguard the privacy of the occupiers of adjoining properties.

7. Tree protection

The development shall be carried out in accordance with the approved Tree Protection Plan dated 10/12/2020 and method statement contained within the submitted Phase II Arboricultural Impact Assessment (Ref: 101 131 Updated 17/09/2019 and received on 10/12/2020)

Reason: To protect the retained trees on site in accordance with DMD80

8. Landscaping

The site shall be landscaped in accordance with the approved landscaping drawing (ref: GUA-Dr-L-001 Revision P03) including the provision of at least 5 new trees on site in the first planting season after completion or occupation of the development whichever is the sooner.

The landscaping and tree planting shall be carried out and maintained in accordance with the approved Phase II Arboricultural Impact Assessment (Ref: 101 131 Updated 17/09/2019 and received on 10/12/2020)

Any trees or shrubs which die, becomes severely damaged or diseased within five years of planting shall be replaced with new planting in accordance with the approved details.

Reason: In the interests of visual amenity and to enhance the ecological value of the site in accordance with DMD79 and 80.

9. Green roof

- a) Details of the proposed green roofs shall be provided to the Local Planning Authority for approval in writing have been provided to the Local Planning Authority for approval in writing demonstrating the feasibility or otherwise of providing a biodiverse green roof. The submitted detail shall include location, design, substrate (extensive substrate base with a minimum depth 80- 150mm), vegetation mix and density, and a cross-section of all the proposed roofs. The green roofs shall not be used for any recreational purpose and access shall only be for the purposes of the maintenance and repair or means of emergency escape.
- b) The biodiverse green roofs shall be implemented in accordance with the approved details prior to first occupation and maintained as such thereafter. Photographic evidence of installation is to be submitted to the Council.

Reason: To assist in flood attenuation and to ensure the development provides the maximum possible provision towards the creation of habitats and valuable areas for biodiversity in accordance with adopted Policy.

10. Method of enclosure

Prior to the commencement of above ground works, details of the means of enclosure shall be submitted to and approved in writing by the Local Planning Authority. The means of enclosure shall be erected in accordance with the approved detail before the development is occupied and shall be retained thereafter.

Reason: To ensure satisfactory appearance and safeguard the privacy, amenity and safety of adjoining occupiers and the public and in the interests of highway safety

11. Refuse storage

Prior to the commencement of above ground works, details of the siting and design of refuse storage facilities including facilities for the recycling of waste to be provided within the development, in accordance with the London Borough of Enfield - Waste and Recycling Planning Storage Guidance ENV 08/162, have been submitted to and approved in writing by the Local Planning Authority. The facilities shall be provided in accordance with the approved details before the development is occupied.

The facilities shall thereafter be retained within the approved areas except on collection day.

Reason: In the interests of amenity and the recycling of waste materials in support of the Boroughs waste reduction targets.

12. Cycle Parking

No above ground works shall commence until the details and design of secure and fully enclosed cycle parking has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details before it is occupied, and the facility retained for the life of the buildings.

Reason: To ensure the provision of cycle parking in accordance with Policies 6.9 and 6.13 of the London Plan (2016) and the Council's adopted standards.

13. Revised Sustainable Drainage Strategy

The development shall not commence until a Revised Sustainable Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The details shall be based on the disposal of surface water by means of a sustainable drainage system in accordance with the principles as set out in the Technical Guidance to the National Planning Policy Framework and should be in line with our DMD Policy SuDS Requirements:

- a) Shall be designed to a 1 in 1 and 1 in 100 year storm event with the allowance for climate change
- b) Follow the SuDS management train and London Plan Drainage Hierarchy by providing a number of treatment phases corresponding to their pollution potential
- c) Should maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value
- d) The system must be designed to allow for flows that exceed the design capacity to be stored on site or conveyed off-site with minimum impact
- e) Clear ownership, management and maintenance arrangements must be established
- f) The details submitted shall include levels, sizing, cross sections and specifications for all drainage features

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policies 5.12 & 5.13 of the London Plan (2016), Policy CP28 of the Core Strategy (2010), DMD Policy 61 (2014), and the NPPF (2019) and to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value.

14. Groundwater Flood Risk Assessment

Prior to the commencement of any construction work, details of the groundwater level shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:

- a) Photos and a level to the depth of the groundwater table
- b) Measurement from the invert of proposed basement to the water table

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional

throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy, DMD 61, and Policies 5.12 & 5.13 of the London Plan and the NPPF

15. SUDs Verification report

Prior to occupation of the development, a Verification Report demonstrating that the approved drainage / SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include: As built drawings of the sustainable drainage systems including level information (if appropriate) Photographs of the completed sustainable drainage systems Any relevant certificates from manufacturers/ suppliers of any drainage features A confirmation statement of the above signed by a chartered engineer (or similar)

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policies 5.12 & 5.13 of the London Plan (2016), Policy CP28 of the Core Strategy (2010), DMD 61 (2014) and the NPPF (2019).

16. Biodiversity enhancement

- a) Prior to commencement of above ground works, details of the number, siting and specification of bat bricks/tiles designed into and around each new buildings and trees under the supervision of a suitably qualified ecologist shall be submitted to the Local Planning Authority for approval in writing.
- b) Confirmation of installation, prior to first occupation, together with accompanying photographic evidence shall be submitted to the Local Planning Authority. The installation shall be retained for the life of the buildings.

Reason: To enhance the site post development in line with Core Policy 36 by providing suitable nesting features for birds and bats.

17. Carbon emission targets and water efficiency

The development hereby permitted shall be carried out strictly in accordance with the energy saving and water efficiency measures identified in the submitted Energy Statement dated 14/07/2019. The energy saving and water efficiency measures shall be maintained for the life of the buildings.

Reason: In the interest of sustainable development and to ensure that the Local Planning Authority may be satisfied that CO2 emission reduction targets are met in accordance with Policies 5.2 and 5.15 of the London Plan (2016), Policies CP20 and CP21 of the Core Strategy (2010) and DMD 51 of the Enfield Development Management Document (2014).

18. Energy Certificates

Following the practical completion of works a final Energy Performance Certificate with associated Building Regulations Compliance Report shall be submitted to an approved in writing by the Local Planning Authority. Where applicable, a Display Energy Certificate shall be submitted within 18 months following first occupation.

Reason: In the interest of sustainable development and to ensure that the Local Planning Authority may be satisfied that CO2 emission reduction targets are met in accordance with Policy 5.2 the London Plan (2016), CP 20 of the Enfield Core Strategy and DMD 51 of the Enfield Development Management Document (2014).

19. Considerate Constructors

The development shall not commence until an undertaking to meet with best practice under the Considerate Constructors Scheme and achieve formal certification has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the implementation of the development does not adversely impact on the surrounding area and to minimise disruption to neighbouring properties.

20. Construction Management Plan (CMP)

The development shall not commence until a construction management plan has been submitted to and approved by the Local Planning Authority. The construction management plan shall be written in accordance with London Best Practice Guidance and contain:

- a. A photographic condition survey of the public roads, footways and verges leading to the site.
- b. Details of construction access and associated traffic management.
- c. Arrangements for the loading, unloading and turning of delivery, construction and service vehicles.
- d. Arrangements for the parking of contractors' vehicles.
- e. Arrangements for wheel cleaning.
- f. Arrangements for the storage of materials.
- g. Hours of work.
- h. The storage and removal of excavation material.
- i. Measures to reduce danger to cyclists.
- j. Dust mitigation measures.
- k. Membership of the Considerate Contractors Scheme

The development shall be carried out in accordance with the approved construction management plan unless otherwise agreed by the Local Planning Authority.

Reason: To ensure construction does not lead to damage of the nearby public road network and to minimise disruption to the neighbouring properties.

21. Site Waste Management Plan

Notwithstanding the approved documents, the development shall not commence until a revised Site Waste Management Plan has been submitted to and approved in writing by the Local Planning Authority. The plan should include as a minimum:

a) Target benchmarks for resource efficiency set in accordance with best practice

- b) Procedures and commitments to minimize non-hazardous construction waste at design stage. Specify waste minimisation actions relating to at least 3 waste groups and support them by appropriate monitoring of waste.
- c) Procedures for minimising hazardous waste
- d) Monitoring, measuring and reporting of hazardous and non-hazardous site waste production according to the defined waste groups (according to the waste streams generated by the scope of the works)
- e) Procedures and commitments to sort and divert waste from landfill in accordance with the waste hierarchy (reduce; reuse; recycle; recover) according to the defined waste groups

In addition, no less than 85% by weight or by volume of non-hazardous construction, excavation and demolition waste generated by the development has been diverted from landfill

Reason: To maximise the amount of waste diverted from landfill consistent with the waste hierarchy and strategic targets set by Policy DMD57 of the Development Management Document and Policies 5.17, 5.18, 5.19, 5.20 of the London Plan.

22. Clearance of vegetation during bird nesting

All areas of trees, hedges, scrub or similar vegetation where birds may nest which are to be removed as part of the development, are to be cleared outside the bird-nesting season (March - August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably qualified ecologist will check the areas to be removed immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded, no vegetation clearance or other works that may disturb active nests shall proceed until all young have fledged the nest.

Reason: Nesting birds are protected under the Wildlife & Countryside Act, 1981 (as amended), this condition will ensure that wildlife is not adversely affected by the proposed development in line with CP36 of the Core Strategy

23. Vehicular Parking Compliance

The parking area forming part of the development shall only be used for the parking of private motor vehicles and shall not be used for any other purpose.

Reason: To ensure that the development complies with Development Plan Policies and to prevent the introduction of activity which would be detrimental to amenity.

24. Removal of Permitted Development Rights

Notwithstanding the provisions of classes A, B and E of the Town and Country Planning (General Permitted Development) Order 2015 (or any amending Order), no buildings or extensions to the existing and new buildings hereby approved shall be erected without the prior approval in writing of the Local Planning Authority.

Reason: In the interests of residential amenity and to prevent the overdevelopment of the site.

3. Executive Summary

- Planning permission (ref: 19/02830/FUL) was granted by the Planning Committee for demolition of existing 1no. 4-bedroom dwelling (C3) and erection of 4no. 4-bedroom (8 person) houses with basement level accommodation and associated works on 18 October 2019. On this basis, the principle of redevelopment of the subject site into 4 new dwellings has been established. The current application involves the following major changes from the original permission (ref: 19/02830/FUL).
 - Increased the scale of the proposed dwellings of Plots 1 and 2 at ground floor and first floor levels and omitted the proposed basements.
 - The traditional design with pitched roof gables has been replaced with a more contemporary design with flat roofs.
 - Increased the extent of green roof from 270sqm to 438sqm
 - Introduced new fenestration
 - Introduced covered car ports for each house
 - Increased the number of replacement trees while maintaining the number of existing trees to be removed
- 3.2 With reference to these changes, and having regard to the extant planning permission granted and adopted / emerging development plan it is considered the proposed development would remain acceptable

4. Site and Surroundings

- 4.1 The application site is an irregular shaped site fronting the northern side of Camlet Way. The site is accessed from Camlet Way by a single-lane existing private laneway (32.4m in length) located between 39 and 41 Camlet Way. The site has quite heavy foliage throughout however the site is not subject to any Tree Preservation Orders.
- 4.2 The site as existing, hosts a two-storey (4-bed) dwelling within the central northern part of the site, which is proposed to be demolished. There are limited public views into the site as it is set-back from Camlet Way and the northern part of the site is located behind the existing neighbouring dwellings fronting the northern side of Camlet Way.
- 4.3 The area is an established suburban residential area. The surrounding built context is varied in its age, scale and appearance. The northern site boundary is 45.6m south of the southern boundary of the Hadley Wood designated Conservation Area. The proposed development would not affect any statutory listed buildings.
- 4.4 To the north, Nos. 9 and 10 Alderwood Mews are two-storey detached properties which are sited at a lower ground level.
- 4.5 To the south and south-west, Nos 37 and 39, and Nos 41 and 43 Camlet Way are two pairs of two storey semi-detached properties. No. 35 Camlet Way hosts a re-developed flatted development, granted planning permission in 2015, which is currently under construction.
- 4.6 The application site abuts the rear gardens of 31 Camlet Way and 45 to the east and the west respectively.

4.7 Two existing vehicle garages are located outside of the application site outlined in red which can only be accessed by the lane which serves the site. These garages are understood to be owned by the owners of existing dwellings fronting Camlet Way, south of the application site. These garages are to be retained and would not be affected by the development.

5. Proposal

- 5.1 The development proposes 4no. dwellings of a contemporary appearance over 2-storeys (Plots 1 and 2) and three storeys (Plots 3 and 4) integrating basement, ground and first floor level accommodation.
- 5.2 The following are the main changes from the previously approved scheme (ref: 19/02830/FUL):
 - An increase in the scale of the proposed main buildings of Plots 1 and 2 at ground floor and first floor levels and the omission of the proposed basements.

Plot	Level	Approved scheme		Proposed scheme	
		Width	Depth	Width	Depth
1	Ground floor	9.6m-11.85m	10.8m	12-14m	13.3m
	First floor	9.7m	4.6m	13.2m	8.6m
2	Ground floor	6.7m-10.9m	9.2m-10.6m	12-15m	10.9m
	First floor	4.9	8.2m	10.5m- 11.5m	10.7m

- The traditional design with pitched gables has been replaced with a more contemporary design with flat roofs.
- The extent of green roofs has been increased from 270sqm to 438sqm
- New fenestration introduced
- Covered car ports with green roofs for each house introduced
- An increase in the number of replacement trees (there is no change in the number of trees to be removed)
- 5.3 During the course of this application, the applicant has also submitted the following clarification and revised the scheme to address the issues raised by officers and in response to the representations received.
 - Preliminary details of mortar
 - Landscape masterplan
 - Mock-up view towards Alderwood 9 and 10 from the first floor east-facing bedroom window of Plot 2
 - Added brick details to the ground floor areas and the entrance areas.
 - Revised design of the main entrance doors
 - Detailed drawings showing the proposed window reveal depths
 - Increased the number of replacement trees
- 5.4 With regards to plot 3 and 4, the proposals are mostly unchanged from the previously approved scheme other than the change of the roof of the first floor element to a flat roof, and the introduction of a green deck/canopy to cover the car parking spaces.

6. Relevant Planning History

Application site

Reference - 19/02830/FUL

Demolition of existing 1no. 4-bedroom dwelling (C3) and erection of 4no. 4-bedroom (8 person) houses with basement level accommodation and associated works

Decision Level - Planning Committee

Decision Type - Granted with Conditions

Decision Date - 18.10.2019

Reference - 18/03224/PREAPP

Development Description – Proposed redevelopment of site and erection of 4 x residential units.

Decision Type - Officer Level Advice Provided

Reference - 17/04406/FUL

Development Description – Redevelopment of site and erection of 2 \times 3 bed single family dwellings and a block of 4 self contained flats comprising 4 \times 3 bed with associated parking and landscaping.

Decision Level - Delegated

Decision Type – Refused

Decision Date - 18.12.2017

Reference - 16/00877/FUL

Development Description - Redevelopment of site and erection of 2 detached 5 bed single family dwellings together with garage and raised terraces.

Decision Level - Delegated

Decision Type - Refused

Decision Date - 19.05.2016

31 Camlet Way

Reference - 17/02071/FUL

Development Description – Redevelopment of site by the erection of a detached 2-storey, 6-bed dwelling house including rooms in roof, basement level with incorporating swimming pool, garage at front and associated landscaping.

Decision Level - Delegated

Decision Date - 10.07.2017

35 Camlet Way

Reference - 16/05740/FUL

Development Description – Minor material amendment to 14/02622/FUL to allow increase in building height by 700mm, increase of parking spaces, alterations to size of ground floor apartments, elevations to include feature windows, brick quoin and stone copping details, glazed balconies, removal of railings to side elevation, rooflights to replace dormer windows to side together with alterations to fenestration and other associated works.

Decision Level – Delegated

Decision Type - Granted

Decision Date - 07.02.2017

Reference - 16/00201/FUL

Development Description – Minor Material amendment to 14/02622/FUL to allow increase in building height by 700mm, increase in parking spaces and loss of residential floor space on basement level, amendments to size of ground floor apartments, alterations to elevations to include additional feature windows on gables, brick Quoin and stone coping details, railing on balconies replaced with glazing, brick/stone detailing on entrance to replace railings, splayed window detailing, railings removed on side elevation, insertion of 4 windows to side elevation, rooflights to replace dormer windows on side elevation, glass lantern added on roof to hide lift overhang, amended dormer detail, window proportions, front door detail to include double doors and chimney design.

Decision Level – Delegated Decision Type – Granted Decision Date – 13.04.2016

Reference - 14/02622/FUL

Development Description – Redevelopment of the site to provide 8 residential apartments (Class C3)

Decision Level - Granted

Decision Type – Delegated

Decision Date - 27.03.2015

7. Consultation

Public

- 7.1 Consultation letters have been sent to 24 neighbouring and nearby residential propoerties(consultation period ended 13.09.2019). At the time of writing the report, five objections were received from residents. A summary of the comments made within representations received is below:
 - Inadequate access arrangement;
 - Increase in traffic;
 - Insufficient vehicular parking;
 - Refuse collection;
 - Out of character with surrounding dwellings;
 - Overdevelopment of site:
 - Topography of site;
 - Excessive scale/massing
 - More open space needed on development
 - Loss of privacy;
 - Lack of tree screening between shared boundary; 39A and 31 Camlet Way:
 - Proximity to northern boundary; shared with no's. 9 and 10 Alterwood Mews;
 - Increase in flood risk:
 - Creation of car ports;
 - Noise impact of intensified use;
 - Request for fence-topper (0.75-1m) on the dividing wall between Alderwood and the subject site
 - Impact to trees

Statutory and Non-Statutory Consultees:

- 7.2 Transportation: No objection. Comments integrated into body of report.
- 7.3 SUDS No objection subject to appropriate conditioning requiring ground water flood risk assessment.

8. Relevant Policies

- 8.1 <u>Draft New London Plan (2019)</u>
- 8.2 A new draft London Plan was published 29 November 2017 for consultation purposes with consultation ending 2 March 2018. The current 2016 consolidated London Plan is still the adopted Development Plan for Greater London, but the Draft New London Plan is now a material consideration in planning decisions. The significance given to it is a matter for the decision makers, but it gains more weight as it moves through the process. It was anticipated that the adoption/publication of the final London Plan would have been in March 2020, and as such its weight, as a material consideration, is increasing.

In the circumstances, it is only those policies of the Intention to Publish version of the London Plan, that remain unchallenged to which weight can be attributed.

Policy GG1 – Building Strong and Inclusive Communities

Policy GG2 – Making the Best Use of Land

Policy GG3 – Creating a Healthy City

Policy D1 – London's Form, Character and Capacity for Growth

Policy D4 – Delivering Good Design

Policy D5 – Inclusive Design

Policy D12 - Fire Safety

Policy D14 - Noise

Policy G6 – Biodiversity and Access to Nature

Policy SI1 – Improving Air Quality

Policy SI2 - Minimising Greenhouse Emissions

Policy SI4 – Managing Heat Risk

Policy SI12 - Flood Risk Management

Policy SI13 – Sustainable Drainage

Policy T4 – Assessing and Mitigating Transport Impacts

Policy T5 - Cycling

Policy T6 – Car Parking

Policy T7 – Deliveries, Servicing and Construction

Policy DF1 – Delivery of the Plan and Planning Obligations

8.3 <u>London Plan (2016)</u>

Policy 3.3 - Increasing housing supply

Policy 3.4 - Optimising housing potential

Policy 3.5 - Quality and design of housing developments

Policy 3.8 - Housing choice

Policy 3.9 - Mixed and balanced communities

Policy 3.14 - Existing Housing Stock

Policy 5.1 - Climate change mitigation

Policy 5.2 - Minimising carbon dioxide emissions

Policy 5.3 - Sustainable design and construction

Policy 5.13 - Sustainable drainage

Policy 5.14 - Water quality and wastewater infrastructure

Policy 5.15 – Water Use and Supplies

Policy 6.3 - Assessing the effects of development on transport capacity

Policy 6.9 - Cycling

Policy 6.12 - Road network capacity

Policy 6.13 – Parking

Policy 7.1 – Lifetime neighbourhoods

Policy 7.3 – Designing out crime

Policy 7.4 - Local Character

Policy 7.5 - Public Realm

Policy 7.6 - Architecture

Policy 7.19 - Biodiversity and access to nature

Policy 7.21 - Trees and woodland

Policy 8.3 - Community infrastructure levy

8.4 Core Strategy

CP2 - Housing supply and locations for new homes

CP4 - Housing quality

CP5 - Housing types

CP20 - Sustainable energy use and energy infrastructure

CP21 - Delivering sustainable water supply, drainage and sewerage infrastructure

CP22 - Delivering sustainable waste management

CP25 - Pedestrians and cyclists

CP28 - Managing flood risk through development

CP30 - Maintaining and improving the quality of the built and open environment

CP32 - Pollution

CP36 - Biodiversity

8.5 Development Management Document

DMD3 - Providing a Mix of Different Sized Homes

DMD6 - Residential Character

DMD7 - Development of Garden Land

DMD8 – General Standards for New Residential Development

DMD9 - Amenity Space

DMD10 - Distancing

DMD 37 -Achieving high quality and design-led development

DMD38 - Design Process

DMD45 - Parking Standards and Layout

DMD49 – Sustainable Design and Construction Statements

DMD50 – Environmental Assessment Methods

DMD51 - Energy Efficiency Standards

DMD53 - Low and Zero Carbon Technology

DMD55 - Use of Roof Space/Vertical Surfaces

DMD58 – Water Efficiency

DMD59 - Avoiding and Reducing Flood Risk

DMD61 – Managing Surface Water

DMD81 – Landscaping

8.6 Other Material Considerations

- National Planning Policy Framework (NPPF) 2019
- National Planning Practice Guidelines (NPPG)
- Strategic Housing Market Assessment (2015)
- Enfield Characterisation Study 2011
- Technical Housing Standards
- Nationally Described Space Standards
- London Housing SPG
- Strategic Housing Market Assessment (SHMA) (2015)
- Enfield's Characterisation Study
- Intend to Publish London Plan 2019

9. Assessment

- 9.1 The impacts of the redevelopment of the subject site into four dwellings have been established to be acceptable in the previously approved scheme (ref: 19/02830/FUL). With regard to the changes, the main issues associated with the revised proposal in this application are the following:
 - Character and Appearance of the Area
 - Residential Amenity
 - Quality of Accommodation
 - Sustainable Drainage
 - Trees and Landscaping
 - Sustainable Design and Construction

Principle of Development

9.2 The previous planning permission (ref: 19/02830/FUL) has already established the principle of redevelopment of the subject site to provide four individual houses.

Dwelling Mix

9.3 The development defines minor development and proposes to replace 1no. existing family sized dwelling (defined as 3+ bedrooms) with 4no. 4-bedroom (8-person) dwellings. The dwelling mix is considered acceptable and adequately compliant with the spirit of relevant London and Local Plan policy objectives.

Character and Appearance of Surrounding Area

- 9.4 Many of the representations received objected to the design of the development on the following grounds:
 - Out of character with surrounding dwellings;
 - Overdevelopment of site; and
 - Excessive scale/massing.
- 9.5 The application proposes the demolition of the existing dwelling and construction of 3no. buildings 2no. detached dwellings (Plots 1 and 2) and 1no. semi-detached pair (Plot 3 and 4); 4no dwellings in total.
- 9.6 Whilst the surrounding area is suburban and residential in its character, no prevailing characteristics in terms of design or scale, particularly when

- considering the approved more contemporary development at both 31 and 35 Camlet Way in close vicinity. Generally, development is linear i.e. fronting Camlet Way. However, this pattern is not regimented given the existing garden land development on site.
- 9.7 Despite the increase in scale of the proposed buildings on Plots 1 and 2 at both ground and first floor levels, given the proposed layout and staggered form, it is considered there would be sufficient spacing at first floor levels between the houses on the site, to the site boundaries and to the houses surrounding the site. The proposed development therefore would not appear y cramped on the application site.
- 9.8 The low-rise nature of the proposed development is sensitive to the topography of site and the surrounding area (impact to neighbouring residential amenity assessed within relevant section of report). Also public views of the site are very limited, noting the long access lane separating the site from Camlet Way.
- 9.9 The proposed flat roof design across the whole scheme would form a coherent design response and officers including urban design, are supportive of the contemporary and simplistic approach to design. The proposed covered car ports will be single storey and feature green roofs.
- 9.10 With regards to materials, a natural palette is proposed with white/grey brick on all elevations, which would be sympathetic to the white painted bricks of the house at No.41 adjacent to the front access to the subject site. Green roofs are proposed on all of the flat, first floor roofs and on the roofs of the car ports. During the course of this application, the applicant has also added brick details to the ground floor areas and the entrance areas, and revised design of the main entrance doors.
- 9.11 The current scheme is also materially different and has a smaller scale than the previously refused applications.
- 9.12 The refused application 16/00877/FUL proposed 2no. large detached dwellings of a maximum height of approximately 9.3m to be located within the central part of the site; with *plot 2* being close to the northern boundary of the application site. The refused dwellings, by reason of their scaling and massing were concluded to result in demonstrable harm to the open, spacious and suburban character and appearance of the site and area.
- 9.13 The refused application 17/04406/FUL proposed the erection of 3no. buildings comprising 2no. detached dwellings and a building accommodating 4no. (3-bedroom) flats. The siting and overall scale and bulk are materially different from the current scheme.
- 9.14 For reasons outlined, development is not considered to be at odds with the character of the surrounding area complaint with the outlined relevant policy framework. The proposed scale and design of development are considered acceptable and would integrate acceptably into the surrounding locality and comply with policies DMD6, 8 and 37, CP30 of the Core Strategy and London Plan policies 7.4 and 7.6.

Residential Amenity

- 9.15 Representations received which objected on the basis of development's impacts to residential amenity on the following grounds:
 - Topography of site;
 - Overlooking impact;
 - Loss of privacy;
 - Lack of tree screening between shared boundary; 39A and 31 Camlet Way;
 - Proximity to northern boundary; shared with No's. 9 and 10 Alderwood Mews;
 - Noise impact of intensified use;
- 9.16 Policy 7.6 of the London Plan states that developments should have appropriate regard to their surroundings, and that they improve the environment in terms of residential amenity. Policy CP30 of the Enfield Core Strategy seeks to ensure that new developments are high quality and designled, having regards to their context. They should help to deliver Core Strategy policy CP9 in supporting community cohesion by promoting attractive, safe, accessible and inclusive neighbourhoods. Policy DMD8 states that new developments should preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance.
- 9.17 Policy DMD10 of the Development Management Document outlines that new development is required to maintain minimum distances between buildings; in order to avoid unacceptable adverse impacts to daylight, sunlight and overlooking. The policy outlines a minimum of 22 metres between rear facing windows and recommends the avoiding of side windows unless it can be demonstrated that overlooking and loss of privacy would be insignificant.

Outlook, daylight and sunlight

- 9.18 In respect to the increase in scale of the new houses from the approved development (ref: 19/02830/FUL), the applicant provided an updated daylight and sunlight assessment (dated 23 June 2020) which suggests that the most affected neighbouring property is the house at no.9 Alderwood Mews to the north-east of the application site. The daylight and sunlight consultant has undertaken the Vertical Sky Component (VSC) test. BRE Guidelines indicate that for a development to pass the test, an impacted window, with the development in place, should maintain at least 80% of the daylight levels experienced pre-development. All windows on the south-east (rear) elevation of No. 9 Alderwood Mews were tested. It was confirmed that all windows exceed the test by a significant amount; with only windows A -E (ground floor) and window L - N (first floor), experiencing any reduction in daylight as a result of the proposed development. This reduction is calculated at a 0.1% reduction and therefore would be negligible. Impacts of the proposed development to sunlight levels received by windows in the rear elevation of No.9 were also tested. Results show that the proposed development would result in a maximum of 0.06 ratio reduction to sunlight access the most affected windows. This impact is considered less than negligible and compliant with BRE Guidelines.
- 9.19 The daylight/sunlight assessment tested windows within both the south-west (rear) and south east (side) elevation of No.10 Alderwood Mews. All results

- demonstrate that the impact of the development upon these windows would be minimal.
- 9.20 With regards to the outlook, despite the increase in scale of the proposed houses of Plots 1 and 2, the first-floor elements will still be sited sufficiently distant away from Nos. 39 and 41's respective rear elevations at 25.3m and 38.7m respectively. 10 Alderwood's rear elevation will face the new house of Plot 2 at a distance of 11.7m with an oblique view.
- 9.21 The scale and siting of the first-floor elements of the new houses of Plots 3 and 4 have not changed. Although the rear elevation to No.35 would directly face the proposed new house of Plot 3 at a distance of 13.6m, the proposed change from a pitched roof to a flat roof with a reduction in the maximum height would not result in any loss of outlook from no 35 that would be materially different from the approved scheme. The proposed new house of Plot 4 will still be sited behind the rear elevation of 9 Alderwood at first floor level.
- 9.22 It is therefore considered the impacts on the outlook from adjoining properties would not be unreasonable even when considering the difference in ground level.

Overlooking

Nos 31 and 35 Camlet Way, and 9 Alderwood

- 9.23 The overall footprint of the main houses of Plots 3 and 4 has not changed and the size and position of windows would broadly commensurate the approved scheme (ref: 19/02830/FUL). It is noted that two new windows to en-suite will be introduced within the rear elevation of Plots 3 and 4. Given the non-habitable nature, the proposed obscured glazing, the sufficient distance from the shared boundary with 35 Camlet Way (27.7m), and the oblique view towards Nos. 31 and 35 Camlet Way and 9 Alderwood, these two rear windows at first floor level would not result in any unreasonable overlooking to these adjoining properties to the west, east and south of the proposed new houses at Plots 3 and 4.
- 9.24 The views from the ground floor windows in the northern elevations of Plot 4 to 9 Alderwood would be obscured by an existing boundary wall of at least 1.7m. In the circumstances it is not considered that there would be any levels of overlooking that would harm local residential amenity subject to a condition to request for further details of the means of enclosure.

No.39 Camlet Way

9.25 The position and size of the ground floor window of Plot 1 would broadly commensurate the approved scheme (19/02830/FUL). It is proposed to introduce a new window to the master bedroom within the southern elevation at first floor level. Given the proposed obscured glazing, sufficient separation distance from the rear elevation of No.39 to the south (28.3m) and from the shared boundary (9.4m) and the existing vegetation screening including the retained mature tree (T22) and a new replacement tree on the south-east boundary of Plot 1. It is therefore considered this new first floor window in the southern elevation would not result in any unreasonable level of overlooking to the main house and immediate private amenity space of No. 39.

- 9.26 To the south of Plot 2, No.41 has been extended by a single storey rear extension. And there are two detached rear garages between No.41's rear garden and the subject site, which would buffer any overlooking from the ground floor windows of Plot 2. The dense vegetation (T1-T5) along the southern shared boundary with Nos.41 and 43 would be retained. The proposed three windows to the bedrooms at first floor level in the southern elevation will be sited at least 9.8m from the southern shared boundary and 38.7m from No.41's extended rear elevation. Given the sufficient separation distance from Nos.41 and 43's main houses and immediate private amenity space, and the retained vegetation screening, the proposed first floor windows in the southern elevation of Plot 2 would not result in any unreasonable overlooking to Nos 41 and 43.
- 9.27 The first-floor window in the front elevation of Plot 1 will mainly face Plot 2' private amenity space (See 'Quality of Accommodation Overlooking' section below). These windows will serve en-suites and be obscured glazed. Any views towards Nos.41 and 43 Camlet Way will be oblique and only directed at the garage of No.41 and the end the rear garden of No.43.

10 Alderwood

9.28 The ground floor windows in the northern elevation of plot 2 will face the existing 3.5m boundary wall, which would prevent overlooking from these ground floor window to 10 Alderwood. The first-floor window to the landing area would be non-openable and obscured glazed. It is noted that the window to bedroom at first floor level in the eastern front elevation will be sited approximately 7.7m and 13.1m away from the shared boundary with 10 Alderwood and the rear elevation of No.10's main house respectively. However, the proposed windows will have an 200mm in-set and the applicant has demonstrated that the views from the proposed in-set windows towards 10 Alderwood would be oblique. The retained mature trees (T30, T28, T27) and the replacement trees along the northern side boundary would also help screen the view from this first-floor front window of Plot 2. It is therefore considered that the proposed windows in the eastern elevation would not result in any unreasonable level of overlooking to 10 Alderwood.

Nosie and disturbance

- 9.29 The resultant noise and disturbance from the new dwellings has been established to be acceptable under planning permission (ref: 19/02830/FUL) and this application does not increase the number of units or the level of occupancy.
- 9.30 In summary, the proposed development would not cause harm to the residential character or amenity of its surroundings and is consistent with Policies 7.4 and 7.6 of the London Plan (2016), Policy CP30 of the Core Strategy (2010) and DMD11 and DMD14 of the Development Management Document (2014).
- 9.31 For reasons outlined, development complies with the objectives of the NPPF, (2019), policy 7.6 of the London Plan (2016) and Policy CP30 of the Enfield Core Strategy (2010)

Quality of accommodation

Unit and Bedroom Size, Storage and Floor to Ceiling Heights

- 9.32 The DCLG Technical Housing Standards (2015) defines the Gross Internal Area of a dwelling as the total floor space m-z) assured between the internal faces of perimeter walls that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. Any external private or communal amenity space is not included within the calculation of a gross internal area. The above table outlines the gross internal area of the flatted development on site and compares them with London Plan outlined minimum floorspace standards.
- 9.33 The DCLG Technical Guidance also outlines minimum standards for bedroom sizes stating a single bedroom should have a floor area of at least 7.5m² for single occupants and 11.5m² for a double room.

Plot No	Bed/Person	Proposed Floor Area (m²)	Minimum Floor Area Required (m²)
Plot 1	4-bed/8-person	264	124
Plot 2	4-bed/8-person	246	124
Plot 3	4-bed/8-person	238	130
Plot 4	4-bed/8-person	238	130

- 9.34 As shown in the above table, all the new dwellings would meet the minimum total gross internal floor space for a 4b8p unit. All the bedrooms would also meet the minimum bedroom and built-in storage standard.
- 9.35 The submitted drawings demonstrate that at least 75% of the total gross floor internal area of the proposed new dwellings will have a minimum floor to ceiling height of 2.5m in accordance with Policy 3.5 of London Plan (2016).

Light, Outlook and Layout

9.36 All the proposed dwellings will be dual aspect. The updated daylight and sunlight assessment (dated 23 June 2020) confirms that all the proposed basement bedrooms at Plot 3 and 4 would receive the amount of daylight both in winter and summer recommended by the British Standard Code of Practice for daylighting, BS8206 Part 2. It is therefore considered the proposal would provide a satisfactory level of outlook and natural light for all dwellings.

Overlooking

9.37 It is noted that the front windows of the proposed house of Plot 2 and those of the semi-detached houses of Plots 3 and 4 will directly face each other. However, the distance between the front windows of Plot 2 and the semi-detached houses (Plots 3 and 4) will be approximately 11.2m at both ground and first floor level. It is noted that the distance between these windows will be less than the 22m stated in the DMD Policy 10. However, given the constraints in the site and the avoidance of overlooking to the surrounding properties and the importance of these windows to provide outlook and natural light, it is considered the distance between the windows would be acceptable in this particular instance.

9.38 It is also noted that two first floor front windows of Plot 1 would face Plot 2's private amenity space at a distance of 3.5m. However, given the benefits of these windows to the appearance of the buildings, the non-habitable nature of these windows, and the relatively deep side garden of Plot 2 (approximately 13.3m), the resultant level of overlooking would not be detrimental subject to a condition to ensure these windows would be obscured glazed and non-openable.

Amenity Space

9.39 DMD 9 requires new development to provide good quality private amenity space that is not significantly overlooked by surrounding development and meets or exceeds the minimum area standard.

Plot No	Bed/Person	Proposed Floor Area (m²)	Minimum Floor Area Required for 4b6p (m²)
Plot 1	4-bed/8-person	204	50
Plot 2	4-bed/8-person	167	50
Plot 3	4-bed/8-person	223	50
Plot 4	4-bed/8-person	198	50

- 9.40 As shown from the above table, adequate private amenity spaces will be provided for each dwelling. A condition would be attached to request the details of boundary treatments including the shared boundary between Plot 3 and 4 to safeguard the privacy of the future occupiers. As mentioned in the above section about overlooking, the quality of private amenity space of Plot 2 would not be detrimentally compromised by the first-floor front windows of Plot 1 subject to an instructive condition of obscure glazed and high-opening windows. The provision of amenity space is therefore considered acceptable.
- 9.41 The overall residential offer from a quality of accommodation perspective is acceptable and complies with Policy 3.5 of the London Plan (2016), the London Housing SPG (2016), the DCLG's Technical Standards (2015) and Policies DMD 8 and DMD 9 of the Enfield Development Management Plan (2014)

Trees and Landscaping

- 9.42 The site neither lies within any conservation area nor is the site affected by any trees with Tree Preservation Orders (TPOs).
- 9.43 The applicant has submitted an Arboricultural Impact Assessment (dated 05.10.17 and updated 09.07.20). The document outlines the development proposal would require the removal of eleven trees (pg. 12 of document outlines tree numbers). Four of these trees have already been removed. The submitted document also includes a Tree Protection Plan which outlines root protection areas, and temporary protection measures are to be integrated. Five (5) extra heavy standard replacement trees (14-16cm girth) are proposed along the site boundary to provide a natural screening and enhance the local biodiversity. The number of replacement trees will be greater than the previously approved scheme where three (3) replacement trees were proposed.

9.44 The Council's Tree Officer has confirmed that in view of the extant consent for the previous scheme, the current proposal would not result in any greater impact upon the trees at the site than has already been identified. Conditions are therefore proposed to ensure the implementation of the tree protection scheme detailed within the arboricultural report and the landscaping proposal.

Transportation, Access and Parking

- 9.45 Representations received objected on highways matters/refuse implications, on the following grounds:
 - Inadequate access arrangement;
 - Increase in traffic;
 - Insufficient vehicular parking;
 - Refuse collection;
- 9.46 The open car parking spaces for all the new dwellings in the approved scheme (19/02830/FUL) will change to covered car ports in the current proposal. The car parking space provision and access will remain the same as in the previously approved scheme which is considered to have no detrimental highways implications in terms of vehicular parking, bicycle parking, access and refuse collection.
- 9.47 Concerns about the access was raised during public consultation again in this application. The subject site is accessed from the north side of Camlet way along an existing lane; between 39 and 41 Camlet Way. The existing access measures 3.86 metres in its width and 32 metres in its length (measured from GIS). Whilst relevant guidance encourages two-way vehicle movement (which would not be possible along the lane), the Local Highways Authority state noting the low volume of traffic (both pedestrian and cars), the continued use of the access is acceptable. It should be noted the lane would also continue to serve the 2no. existing vehicular garages outside of the red line of the site, in the same ownership of existing dwellings fronting Camlet Way.
- 9.48 With regard to the safety of the access, the Council's Building Control Officers stated that the previously approved scheme (ref: 19/02830/FUL) met the requirements of the Building Regulations. There are no significant changes in relation to the proposed access, number of units and the level of occupancy, for the current scheme.
- 9.49 In view of the fact that the lane is existing, and the small scale of development proposed, the access arrangements are considered to be acceptable and there is no evidence to suggest that the access arrangements would compromise the safety of any future occupiers.

Sustainable Drainage

9.50 London Plan policies 5.12 and 5.13 require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 (Managing flood risk through development) confirms the Council's approach to flood risk, inclusive of the requirement for SuDS in all developments Policy DMD 61 (Managing Surface Water) expects a Drainage Strategy will be required for all developments to demonstrate how proposed measures manage surface water as close to its source as possible and follow

the drainage hierarchy in the London Plan. All developments must maximise the use of and, where possible, retrofit Sustainable Drainage Systems (SuDS) which meet policy requirements.

9.51 applicant has submitted а Sustainable Drainage (19064/SUDs_R01/RS REV P2 2020.07.08) with the application. The document outlines the approach to integrating mitigation measures to aid drainage of the site. The document outlines that the development results in a reduction to the amount of the site covered with impermeable surfacing. As existing, 900sqm of the site is covered by impermeable hard surfacing. The proposed development would reduce it to 847sqm including 438sqm of green roofs across the site. All first-floor level flat roof areas are to be green sedum roofs. The Council's Sustainable Drainage Officer has no objection to the proposal subject to condition for a revised drainage strategy and a ground water flood risk assessment.

Ecology

- 9.52 It has been established in the previously approved scheme (ref: 19/02830/FUL) that the proposal would not result in any detrimental impact on the ecology. It is proposed to install appropriate bat boxes into all of the proposed buildings. The submitted information is adequate and the mitigation measure suggested would be appropriate.
- 9.53 A compliance type condition would be applied to the decision notice should planning permission be granted to ensure the applicant integrate ecological enhancement measures into the redevelopment of the site inclusive of the integration of bird and bat boxes in compliance with Policy DMD79; Ecological Enhancements, of the Development Management Document (2014).

Sustainable Design and Construction

Energy

- 9.54 Policy 5.2 of the London Plan (2016) expects development proposals to make the fullest contribution to minimising carbon dioxide emission and Enfield Core Strategy Policy CP4 sets a strategic objective to achieve the highest standard of sustainable design and construction throughout the Borough. Policy DMD 50 (Environmental Assessment Methods) required the proposed Development to achieve Code Level 4 (or equivalent rating if this scheme is updated) where it is technically feasible and economically viable to do so. The adopted policies require that new developments achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability. A 35% CO2 reduction over Part L of Building Regulations (2013) is required.
- 9.55 The applicant has submitted an Energy Statement (prepared by Energy Test Ltd. Dated 14/07/2019) which outlines the development will exceed Part L of Building Regulations (2013) and achieve a 35% CO2 reduction. Should the development be granted planning permission, the LPA would require a condition which shows at the stage of practical completion, this reduction has been at least achieved or exceeded.

Water Consumption

- 9.56 Policy DMD 58 (water Efficiency) expects new residential development, including new build and conversions, will be required to achieve a water use of no more than 105 litres per person per day.
- 9.57 The applicant has submitted an Energy Statement (prepared by Energy Test Ltd. Dated 14/07/2019) which outlines that the 105 litre per person per day level will not be exceeded. This is acceptable and should the development be granted planning permission, a compliance condition would be recommended to ensure the development does not exceed the level outlined.

Construction waste

- 9.58 Policy 5.16 of the London Plan has stated goals of working towards managing the equivalent of 100% of London's waste within London by 2031, creating benefits from waste processing and zero biodegradable or recyclable waste to landfill by 2031. This will be achieved in part through exceeding recycling and reuse levels in construction, excavation, and demolition (CE&D) waste of 95% by 2020.
- 9.59 In order to achieve the above, London Plan policy 5.18 confirms that through the Local Plan, developers should be required to produce site waste management plans (SWMP) to arrange for the efficient handling of construction, excavation and demolition waste and materials. Core Policy 22 of the Core Strategy states that the Council will encourage on-site reuse and recycling of CE&D waste. A condition has been attached to request for a site waste management plans (SWMP).

10. Planning Obligations

10.1 Due to the small size of the development, and the fact that all relevant matters can be dealt with by planning condition, no S106 agreement is considered necessary in this instance.

11. Community Infrastructure Levy

11.1 The development shall pay the following CIL contributions upon commencement of development. The size of the proposed development would be liable to a Community Infrastructure Levy contribution as the size exceeds 100 sqm. The calculation is based on a new residential floor area of 569sqm.

Mayoral CIL

11.2 The Mayoral CIL is collected by the Council on behalf of the Mayor of London. The amount that is sought is for the scheme is calculated on the net increase of gross internal floor area multiplied by the Outer London weight of £60 together with a monthly indexation figure. It is noted as of the 1st of April 2019 Mayoral CIL has increased to £60/m². The sum required for this proposal would be £31,870.57 based on the BCIS/Index linked formula.

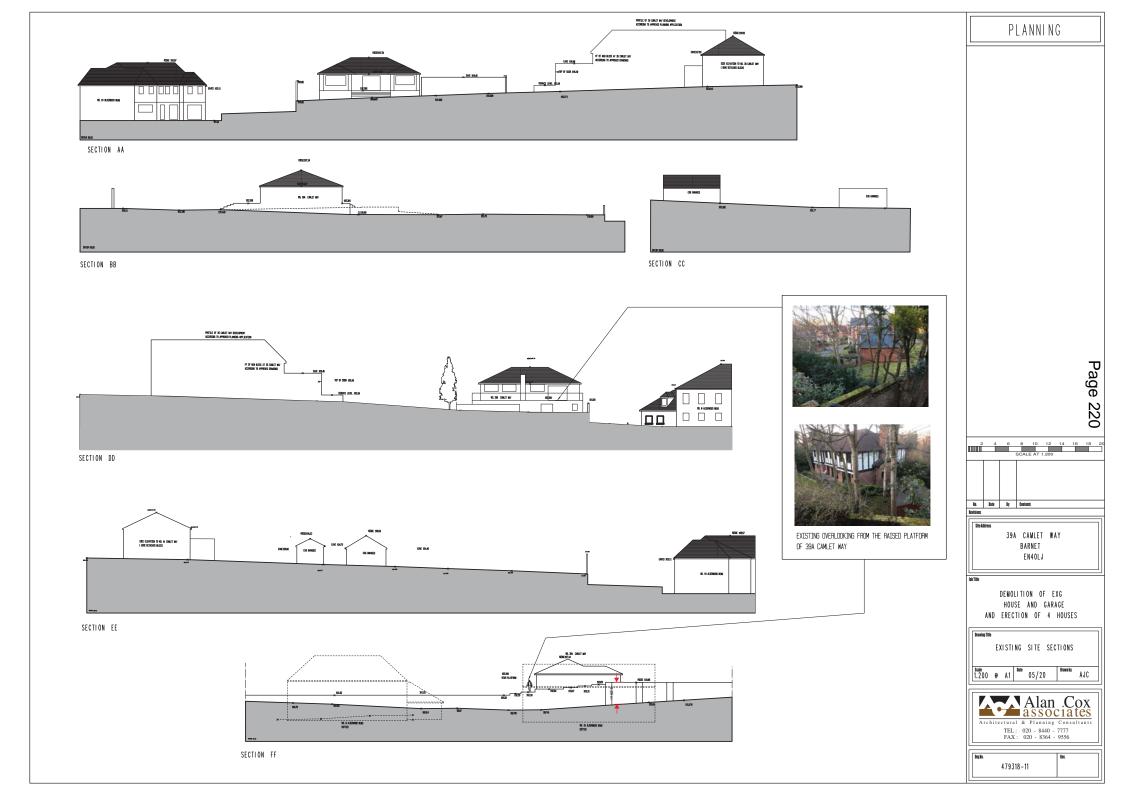
Local CIL

11.3 On April 2016, the Council introduced its own CIL. The site is located within the Borough higher CIL Charging Zone (£120/sqm). The sum required for this proposal would be £78,164.32.

12. Conclusion

12.1 The impact of the previous scheme on the locality was considered to be acceptable and warranted the granted of planning permission. The current scheme would have no greater local impact than the previously approved scheme and would result in a net gain of three family houses in a manner that would satisfy the development plan policies. It is therefore recommended that planning permission be granted.





43 CAMLET WAY

41 CAMLET WAY

39 CAMLET WAY

45 CAMLET WAY

ALDERWOOD MEWS

HOUSES

4

Pedestrian footpath Cobble setts with single string course edge. Natural stone. Colour: beige and

unve
Red shingle with brick edging to be
retained and to be extended on new
section. To be laid in soldier course along
properties boundary and in single string
against proposed parking bays. Colour: red
to match existing

Proposed boundary wall to Architect's specification

Cycle shed Timber. Colour: dark grey or other colour to

Raised planter for vegetable garden Corten or dark grey painted galvanised steel to match architectural features and

Green roof

Ornamental planting beds

Shrubs, grasses and herbaceous perennials. 3, 5 & 10L shrubs, perennials planted as 101

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Existing lawn & additional turf where

Spring bulbs planted at edge of proposed hedge and under proposed trees

Bp Betula pendula

Ls Liquidambar styraciflua

AgRH Amelanchier x grandiflora 'Robin Hill'

Extra heavy standard trees, 14-16cm girth

double staked

Illustrative indication of existing trees and hedges to be retained. Blue lines indicate Root Protection Areas . Refer to 101 363 Arbol EuroConsulting Tree Protection Plan and tree report for information about existing trees and root protection

Note this plan is for planning purposes only

P02 12/10/20 Amended existing tree layout IN CV

Staplefords Farm, Alphamstone, Bures, Essex. CO8 SDT The Record Hall, 16-16A Baldwin's Farden, Hatton +44 (01) 206 638085 · www

Sai Taurah

39A Camlet Way, Barnet

Illustrative Landscape Masterplan

1:200 @ A1 Preliminary 1919 GUA-DR-L-001 P03 Drawn MC CX May 2019

1 GREEN ROOF (FIRST FLOOR)

Green roofs are proposed to provide some insulation, drainage and are low maintenance. The roofs will be extensively planted which will provide a low but dense planting cover to be seen from the first floor windows. This will significantly increase the interest of the roofs as landscaped areas and they are known to contribute to well-being.





Main Entrance

VEGETABLE GARDEN (GROUND FLOOR)

The vegetable garden will be simple and sophisticated with composite decking with a colour which will fit with the surrounding light beige brick walls. For ease of use, the vegetable patches will be installed in raised planters at 400mm to 600mm height. The planters are proposed to be constructed in metal, either corten to match the façade panelling or painted galvanised steel to match the doors and







3 PLANTED STEPS

Planters and steps to be silver grey natural stone to provide continuity with basement level patio and terrace (see below). The stairs are generous which allows for planting alongside it. Lush ornamental planting will soften the lightwell walls and will drive the residents look towards the garden







TERRACE AND BASEMENT PATIO

Patios located at basement floor (down lightwell) and terraces on the ground floor (in garden) will allow for living/dining room spill out. The material used will continue the open plan living surfacing in natural silver grey stone to link the building with the garden. The paving will also harmonise with the colour of the building walls.





PEDESTRIAN FOOTPATH

A change in surfacing will delineate paths from the communal drive. They will be a brown/beige colour mix, acting as a transition between the drive, which will be a red block and the facade, which is a light beige.



laid in random stretcher bond



24 CAMLET WAY

PLANTING PALETTE

Cornus Midwinter Fire', Choisya × dewitteana 'Aztec Pearl', Hebe rakaensis, Hedera helix 'Green Ripple', Hydrangea paniculata 'Limelight', Mahonia 'Soft Caress', Perovskia 'Blue Spire', Pittosporum 'Golf Ball', Phlomis fruitcosa, Euphorbia wulfii Sarcococca hookeriana 'Purple Stem'

Herbaceous Perennials (2 & 31)

Anemone x hybrida 'Honerine Jobert', Bergenia 'Bressingham Ruby' Epimedium x versicolor 'Sulphureum', Geranium x contabrigiense St Olar, Helebeous x hybrida 'Harvington Shades of the Night', Liriope muscari' Royal Pupile;

Knipholia Tawny King', Nepela 'Six Hills Glant', Rudbekia 'Goldstum', Sisytichium stiratum, Salvia' Caradonna'

Grasses & Ferns (3 & 5L)

Anemanthele lessoniana, Blechnum spicant, Calamagrostis brachytricha, Carex morrowii 'Ice Dance, Geum 'Totally Tangerine', Lizula nivea, Miscanthus sinensis 'Kleine Fontāne', Sesieria autumnalis, Stipa gigantea 'Golden Fontaine',

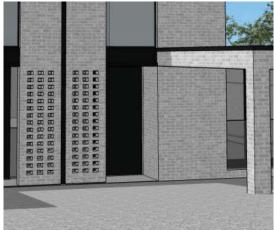
Anemone blanda 'Alba', Narcissus 'February Gold', Tulipa clusiana Chrysantha

Materials - 39a Camlet Way

Brick

This brick will be a white / grey brick which matches the aesthetic of the painted brick to the cottages at the front the mortar will be recessed by 10mm to create contrast.





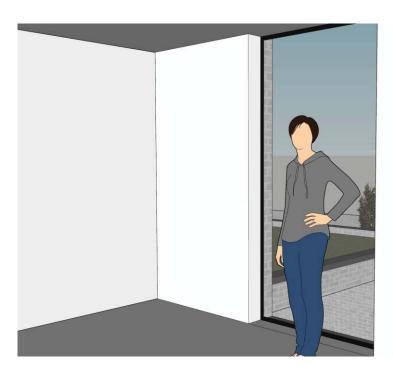
There will also be brick feature textures to the front of the properties.

Windows and trim

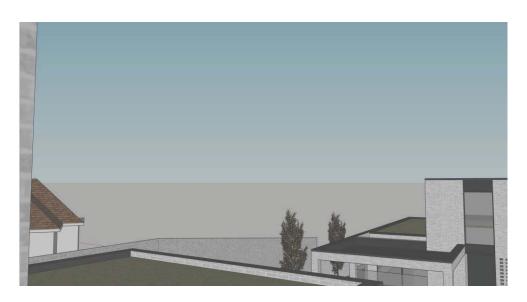
The windows and surrounded trim will be black powder coated aluminium . this will contrast with the white brick and break up the facades. It will create a very contemporary look.



Plot 2 – south first floor bedroom window views



From bedroom



View from window with face pressed up against window.

Note: no trees shown which block the views

Note: 10 Alderwood Mews can barely be seen.

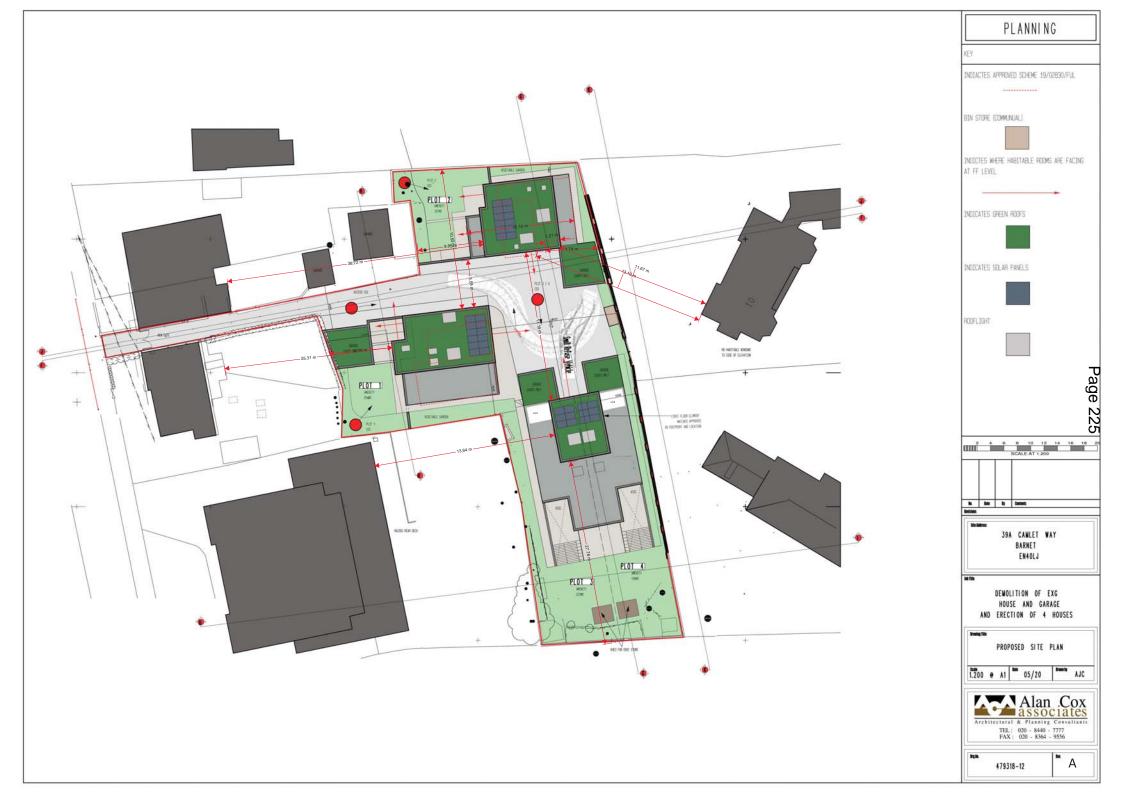
Note: nobody stands at a window with their face pressed dup against it. So image below is more

realistic



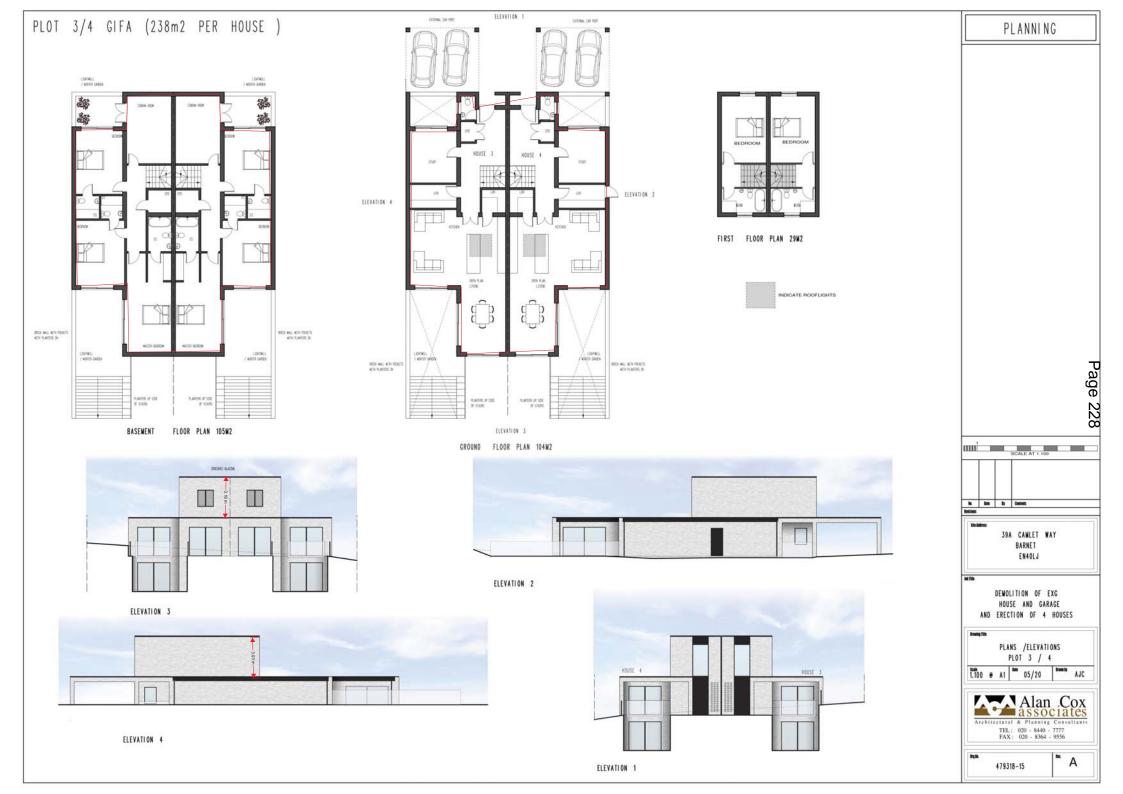
Realistic view standing at window

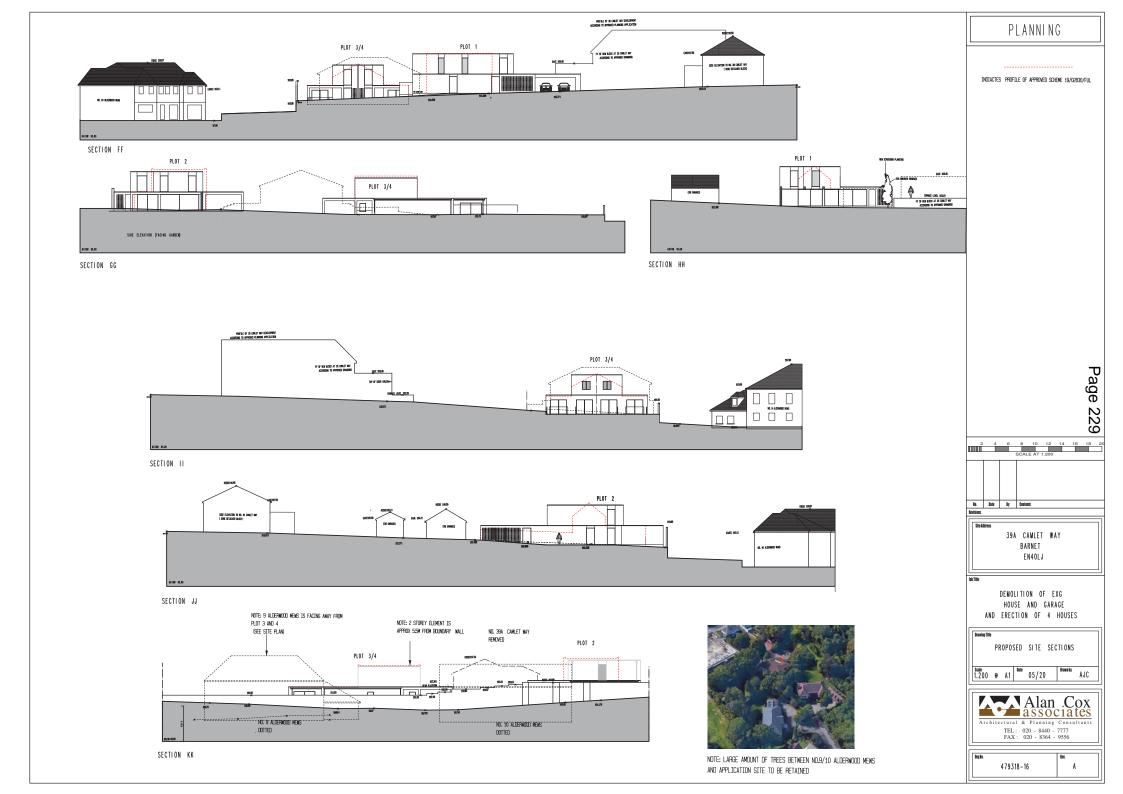
Note: - 10 Alderwood Mews cannot be seen.











PLANNING



PLOT 1 CGI



PLOT 2 CGI







PLOT 3/4 CGI

ACCESS CGI

479318-17