

Public Document Pack



PLANNING COMMITTEE

Tuesday, 4th January, 2022 at 7.30 pm
Council Chamber, Civic Centre, Silver Street,
Enfield, EN1 3XA

Contact: Metin Halil
Governance Officer
Direct : 020-8132-1211 / 1296
Tel: 020-8379-1000
Ext: 1211 / 1296

To view the livestream of the above meeting please click [HERE](#), or copy and paste the below link into your internet browse:

https://teams.microsoft.com/l/meetup-join/19%3ameeting_NWNiNGFhNDAtOTNIZi00ODc1LWE3ODgtMzFhNGRiMTNjYzlm%40thread.v2/0?context=%7b%22Tid%22%3a%222cc18b91d-1bb2-4d9b-ac76-7a4447488d49%22%2c%22Oid%22%3a%22de181320-9e9a-429c-a8db-b37ae5b5ded1%22%2c%22IsBroadcastMeeting%22%3atrue%7d&btype=a&role=a

E-mail: metin.halil@enfield.gov.uk
Council website: www.enfield.gov.uk

Attendees - Covid Guidance from the Council's Public Health Team -

- Do not attend if symptoms consistent with COVID-19 infection (e.g. current cough, fever, loss of sense of smell), irrespective of vaccine status or test result.
- Take a lateral flow test on the day of the meeting, and if positive, self-isolate and organise a PCR test as per UK Government guidance, irrespective of vaccination status.
- Do not attend if household contact of COVID-19 case in the last 10 days, irrespective of vaccination status (note this is above current UK Government guidance).
- Masks should always be worn and cover your face and mouth when inside the Civic centre (excluding those exempt).
- Sanitise or wash your hands with soap on arrival and leaving the Civic centre.

MEMBERS

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

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

To receive the covering report of the Head of Planning.

4. 21/031819/HOU - 11 CHASEVILLE PARK ROAD N21 1PH (Pages 3 - 16)

RECOMMENDATION: That planning permission be Granted subject to conditions.

WARD: Southgate

5. 21/03038/HOU - 20 CHAPEL STREET, ENFIELD, EN2 6QE (Pages 17 - 30)

RECOMMENDATION:

1. That the Head of Development Management be authorised to Grant planning permission subject to conditions.
2. That delegated authority be granted to the Head of Development Management to finalise the wording of the conditions

WARD: Town

6. 20/02858/FUL - 100 CHURCH STREET, ENFIELD, EN2 6BQ (Pages 31 - 96)

RECOMMENDATION:

1. That subject to the finalisation of a S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to Grant planning permission subject to conditions.
2. That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

WARD: Grange

7. 21/03448/FUL - COPPICE WOOD LODGE, 10 GROVE ROAD, SOUTHGATE, N11 1LX (Pages 97 - 152)

RECOMMENDATION:

1. That subject to the finalisation of a S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to Grant planning permission subject to conditions.
2. That the Head of Development Management/Planning Decisions Manager be

granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.
WARD: Southgate Green

8. 21/03765/RE4 - ACCESS ROAD TO THE REAR OF 158-188 GATWARD GREEN AND ADJACENT TO 156 CHURCH STREET, LONDON, N9 9AR (Pages 153 - 172)

RECOMMENDATION:

1. In accordance with Regulation 3 of the Town and Country Planning General Regulations 1992 ,the Head of Development Management / the Planning Decisions Manager be authorised, to Grant planning permission subject to conditions.
2. That delegated authority be granted to the Head of Development Management/Planning Decisions Manager to finalise the wording of the conditions.

WARD: Haselbury

9. FUTURE MEETING DATES

Future meetings of the Planning Committee will be:

- 18 January 22
- 3 February 2022 – Provisional
- 22 February 2022
- 8 March 2022 – Provisional
- 22 March 2022
- 5 April 2022 – Provisional
- 26 April 2022

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MUNICIPAL YEAR 2021/2022

COMMITTEE:
PLANNING COMMITTEE
 4.01.2022

REPORT OF:
 Head of Planning

Contact Officer:
 Planning Decisions Manager
 David Gittens Tel: 020 8379 8074
 Claire Williams Tel: 020 8379 4372
 Gideon Whittingham (Interim)
 Tel: 0208132 1623

AGENDA - PART 1	ITEM 3
SUBJECT - MISCELLANEOUS MATTERS	

4.1 APPLICATIONS DEALT WITH UNDER DELEGATED POWERS INF

4.1.1 In accordance with delegated powers, 185 applications were determined between 06/12/2021 and 16/12/2021, of which 150 were granted and 35 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 DEC

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.

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LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 4 January 2021

Report of
Head of Planning
- Vincent Lacovara

Contact Officer:
Andy Higham
Gideon Whittingham
Jennie Rebairo

Ward:
Southgate

Ref: 21/03819/HOU

Category: Householder Planning
Application

LOCATION: 11 Chaseville Park Road N21 1PH

PROPOSAL: Single storey rear extension

Applicant Name & Address:

c/o Agent

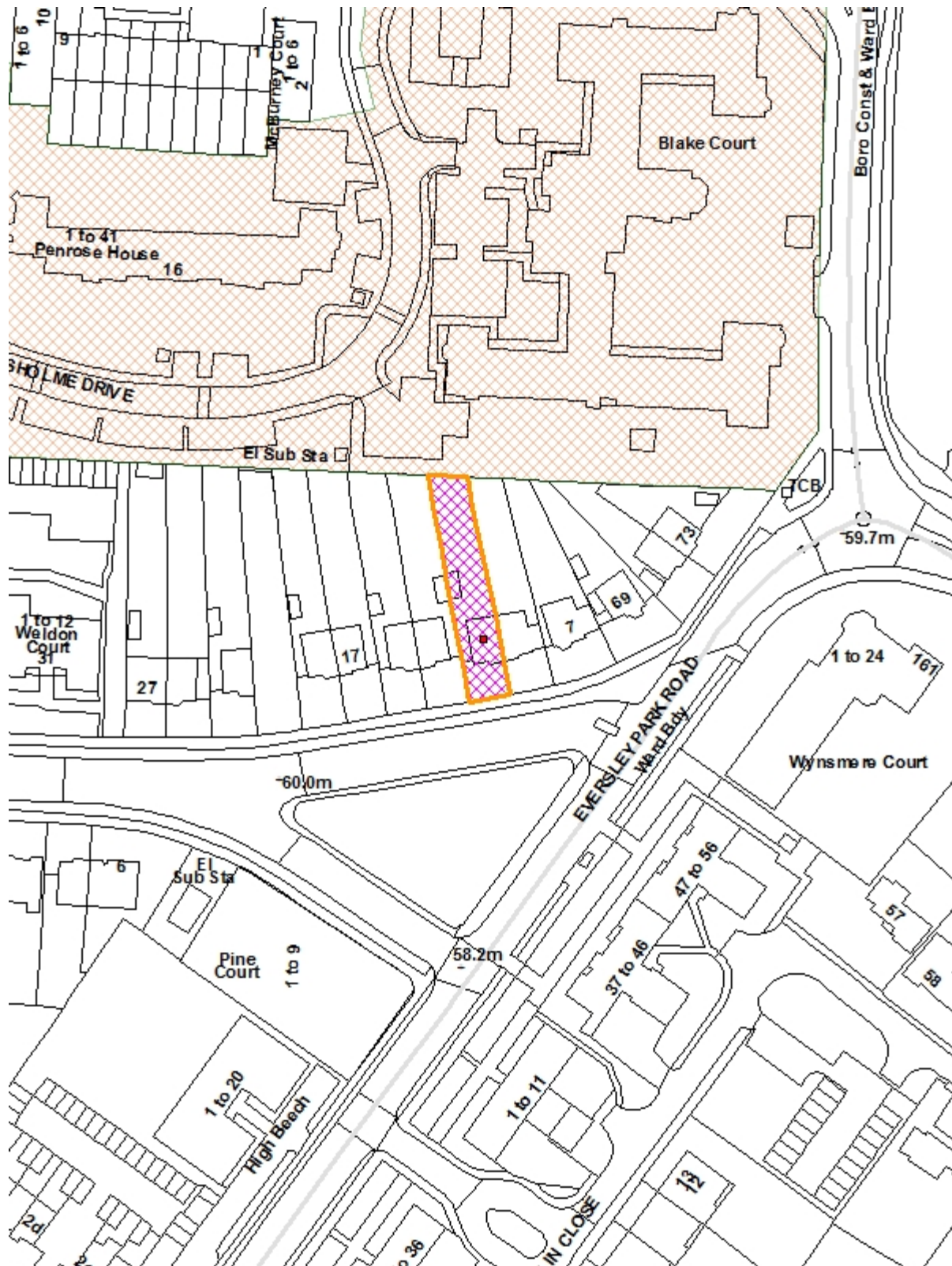
Agent Name & Address:

Mr Tony Martin
K-Side Designs

RECOMMENDATION:

That planning permission be **GRANTED** subject to conditions.

Ref: 21/03819/HOU LOCATION: 11 Chaseville Park Road, London, N21 1PH,



1. Note for Members:

- 1.1 Although a planning application of this nature could be determined under delegated authority, the application is reported to Planning Committee as the applicant is a Council employee. In accordance with the approved scheme of delegation, applications submitted by Council employees cannot be determined by Officers under delegated powers, but must be considered and determined by the Planning Committee

2. Recommendation

- 2.1 The Head of Development Management / the Planning Decisions Manager be authorised to GRANT planning permission subject to the following planning conditions:

1. Time Limited Permission: The development to which this permission relates must be begun no later than three years after the date of this decision notice.

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

2. Approved Plans: The development hereby permitted shall be carried out in accordance with the approved plans:

Site and Location plan – ksd/21/36/01
Existing and Proposed Side Elevations – ksd/21/36/01/1
Existing and Proposed Ground Floor – ksd/21/36/02
Existing and Proposed Rear Elevation – ksd/21/36/03
Existing and Proposed Side Elevations – ksd/21/36/04
Existing and Proposed Roof Plans – ksd/21/36/05
Existing and Proposed Section A-A – ksd/21/36/06

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

3. Materials: The external finishing materials shall match those used in the construction of the existing building and/or areas of hard surfacing.

Reason: To ensure a satisfactory appearance.

3 Executive Summary

- 3.1 This report outlines the material considerations in support of the recommendation to grant permission for the erection of a single storey rear extension.
- 3.2 The proposed development is considered subservient to the host dwelling and not considered to have an unacceptable impact on the character of the surrounding area, particularly in the presence of similar rear extensions.
- 3.3 The siting of the development, adjacent to the adjoining extensions is not considered to have an unacceptable impact on the neighbouring amenity.
- 3.4 It is considered that the proposal satisfies the relevant planning policies and is acceptable subject to the aforementioned conditions.

4 Site and Surroundings

- 4.1 The subject site contains a two-storey semi-detached dwelling, situated on Chaseville Park Road which is a predominantly residential area.
- 4.2 The surrounding area is made up of residential properties a number of which have been extended to the side, rear and within the roof space.
- 4.3 The site is not located within a conservation area, nor does it contain a listed building.

5 Proposal

- 5.1 The proposal seeks to construct a single storey rear extension together with demolition of existing garage in rear garden.

6 Relevant Planning History

- 6.1 **TP/84/0962** - Single storey extension, porch and extension – Refused
- 6.2 **TP/85/1008** - Single storey extension Granted with conditions
- 6.3 **TP/87/0821** - Erection of single storey side extension to dwelling house – Granted with conditions

7 Consultations

7.1 Internal

None

7.2 Public

Number notified	77
Consultation start date	21.10.2021
Consultation end date	14.11.2021
Representations made	0
Objections	0
Other/support comments	0

8. Relevant Policies

London Plan (2021)

- D3 Optimising Site Capacity Through the Design-led Approach
- D 4 Delivering Good Design

Core Strategy (2010)

- CP 30 Maintaining and Improving the Quality of the Built and Open Environment

Development Management Document (2014)

DMD8	General Standards on New development
DMD11	Rear Extensions
DMD37	Achieving High Quality and Design-Led Development

Other relevant documents

National Planning Policy Framework (2021)
National Planning Practice Guidance

9 Analysis

Design

- 9.1 The proposed extension is to the rear of the property, is of an appropriate design in materials to complement the existing dwelling and is in keeping with the character and appearance of the existing dwelling and the surrounding area where rear extensions are commonplace and complies with Core Strategy Policy CP30 and Development Management Document DMD37.

Neighbouring Amenity

- 9.2 Policy DMD11 of the DMD seeks to ensure that residential extensions do not prejudice the amenities enjoyed by occupiers of adjoining residential properties. These policies state that an extension to a terraced or semi-detached property should not normally exceed 3m in depth in order to minimise the impact in terms of loss of light and outlook and to prevent new developments becoming overly dominant. Extensions of a greater depth may be accepted depending on site circumstances.
- 9.3 The extension has a depth of 4.5 metres which exceeds DMD11. However, both adjoining properties have extended to the rear and the proposed would extend beyond those extensions by approximately 1.6 metres. Given both adjoining properties have extended, site circumstances allow for a larger rear extension which due to its limited depth beyond neighbouring extensions is not considered to appear overbearing or have an unacceptable impact on the amenities of adjoining properties through loss of light or outlook and works are considered acceptable.
- 9.4 It is also noted that the orientation of the property has a north facing rear outlook and as a result the proposed works would result in minimal overshadowing of adjoining properties.
- 9.5 Overall, it is considered that given the site orientation and existing structures at adjoining properties, the proposed extension would not appear overbearing or have an unacceptable impact on the amenities of the adjoining properties through loss of light or outlook and complies with DMD11.

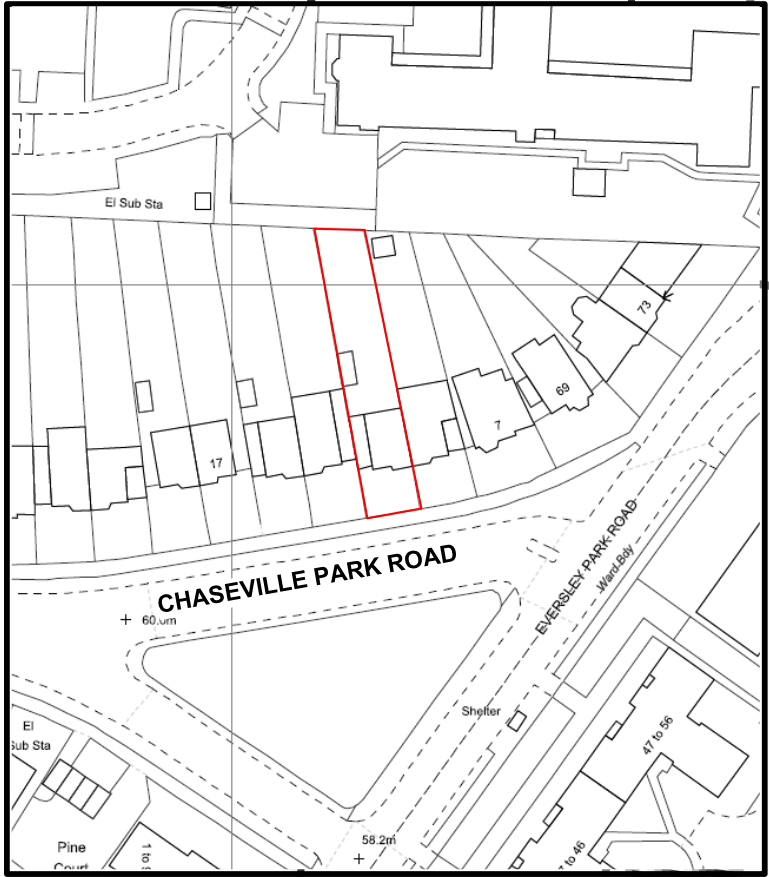
10 Public Sector Equalities Duty

- 10.1 Under the Public Sector Equalities Duty, an equalities impact assessment has been undertaken. It is considered the proposal would not disadvantage people

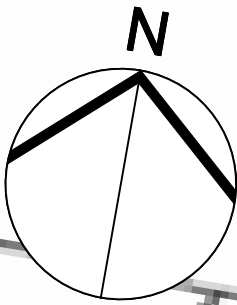
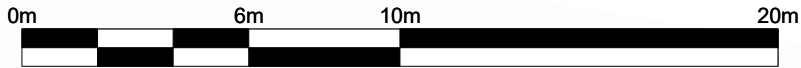
who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

11. Conclusion

- 11.1 Having regard to the above assessment, the proposed development will not have an unacceptable impact on the existing character of the area and the neighbouring amenity. The proposal therefore accords with London Plan (2021) policies D3 and D4, Core Policy 30 of the Council's Core Strategy (2010), and, policies DMD11 and DMD37 of the Council's Development Management Document (2014).

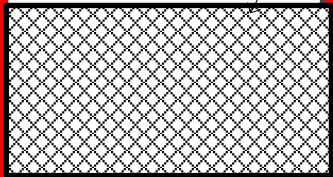


LOCATION PLAN 1/1250



Existing outbuilding
to be demolished

Proposed single
storey extension



CHASEVILLE PARK ROAD

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Rev	Description	Date
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K-Side Designs
Planning, Building and
Structural Consultants

84 Kenilworth Avenue,
London E17 4PE
Tel: 020 8527 2660
07920 745138

Project:
11 Chaseville Park Road
Winchmore Hill
Enfield N21 1PH

Title:
Site and Location Plan

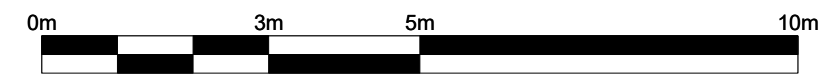
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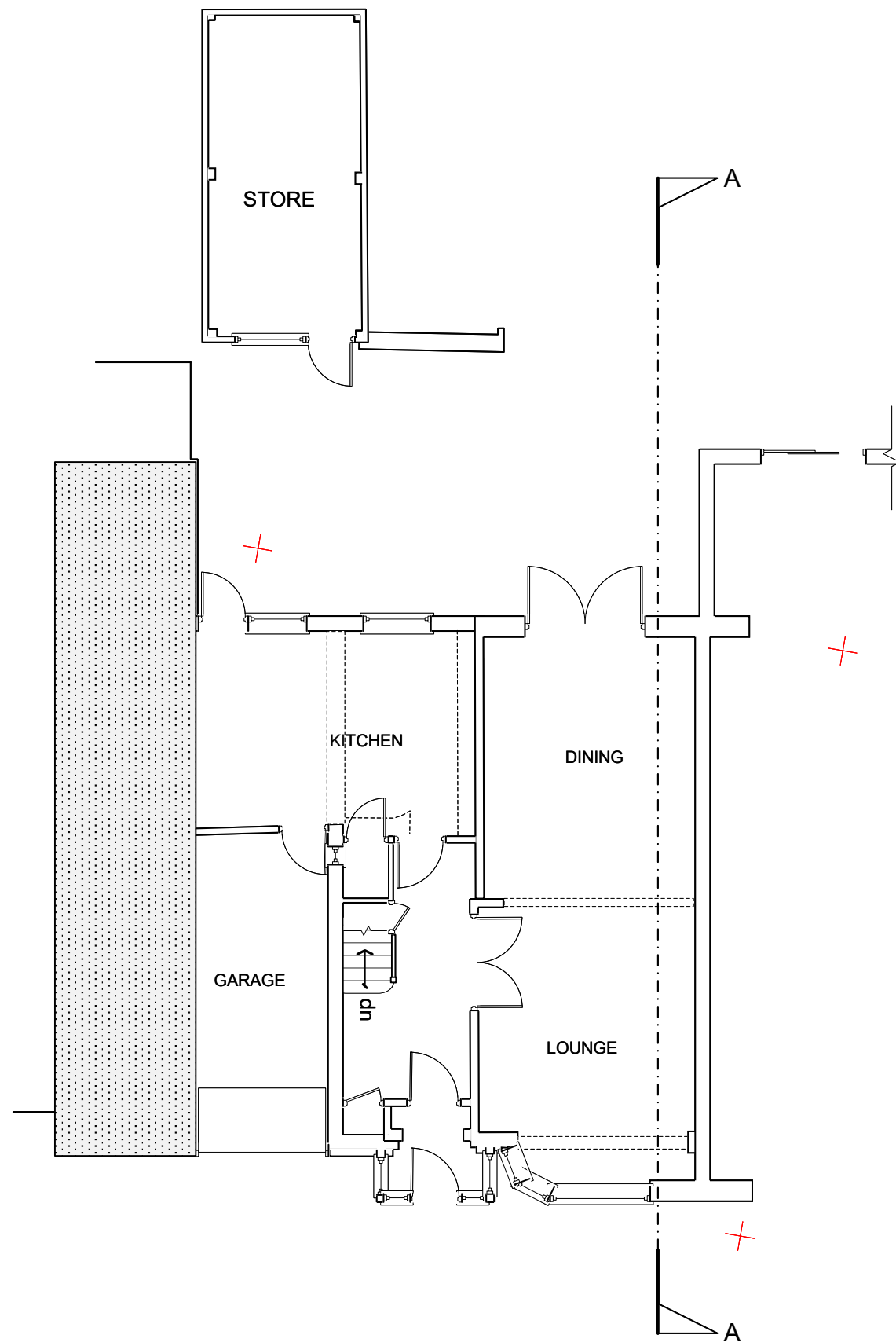
Date:
October 2021

Drawing No:
ksd/21/36/01

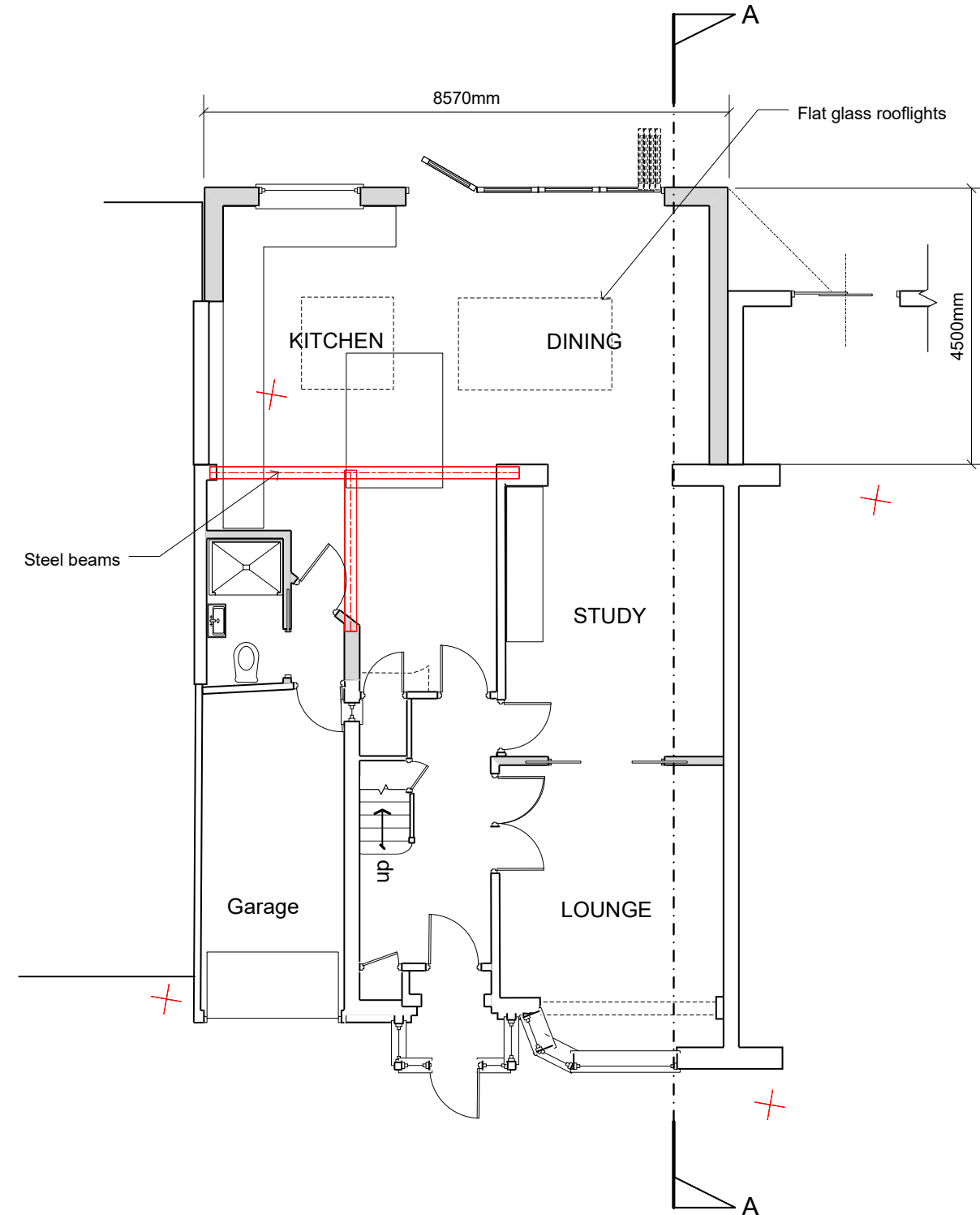
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EXISTING GROUND FLOOR



PROPOSED GROUND FLOOR

K-Side Designs
Planning, Building and
Structural Consultants

84 Kenilworth Avenue,
London E17 4PE

Tel: 020 8527 2660
07920 745138

Project:

11 Chaseville Park Road
Winchmore Hill
Enfield N21 1PH

Title:

Existing and Proposed
Ground Floor

Scale:
1:100 @ A3

Drawn:
ADM

Date:
October 2021

Drawing No:
ksd/21/36/02

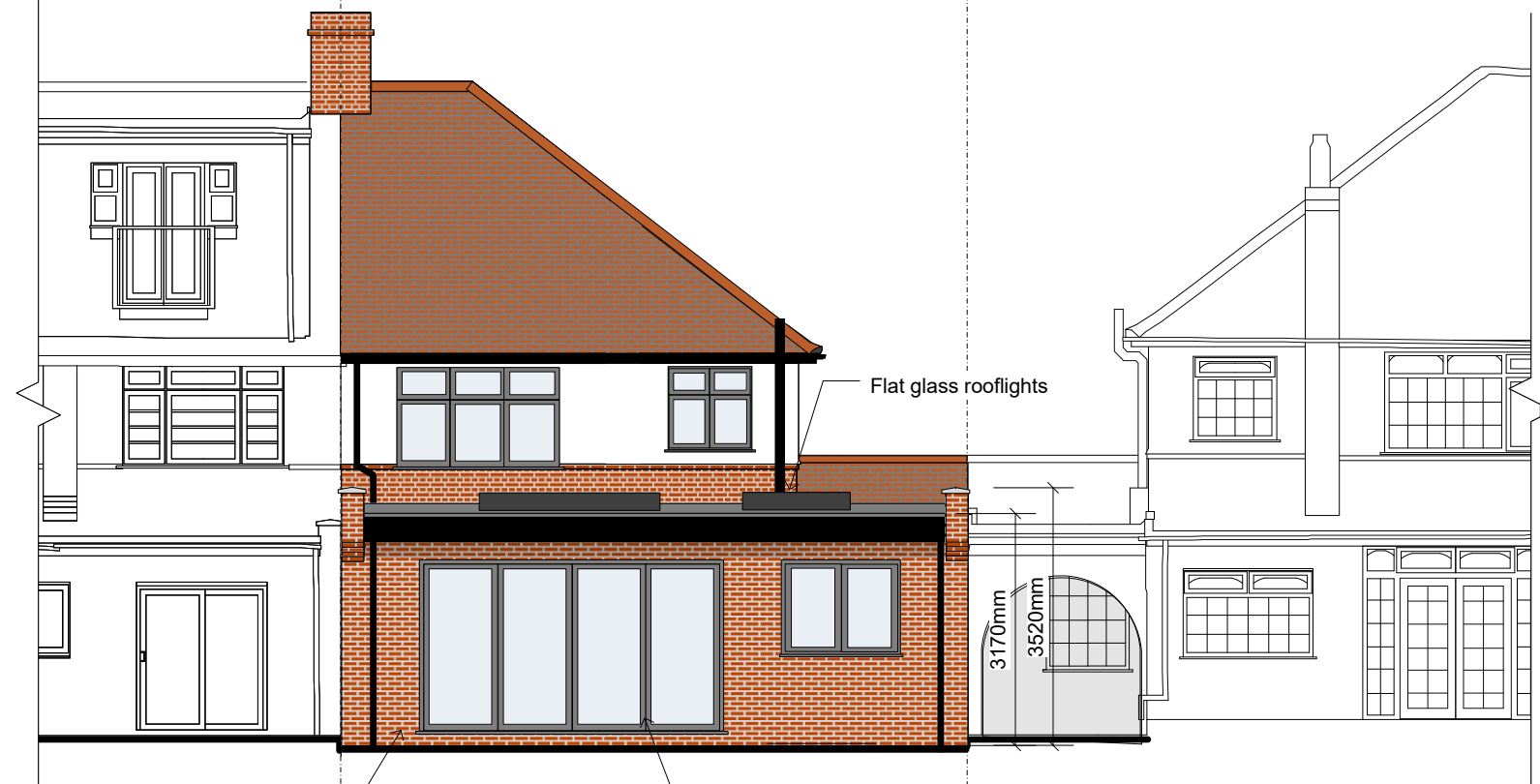
Revision:



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EXISTING REAR ELEVATION



Facing brick to match
existing

Aluminium windows and
doors to match existing

PROPOSED REAR ELEVATION

Rev	Description	Date
<div>K-Side Designs</div> <div>Planning, Building and Structural Consultants</div> <div>84 Kenilworth Avenue, London E17 4PE</div> <div>Tel: 020 8527 2660 07920 745138</div>		
<div>Project:</div> <div>11 Chaseville Park Road Winchmore Hill Enfield N21 1PH</div>		
<div>Title:</div> <div>Existing and Proposed Rear Elevation</div>		
<div>Scale:</div> <div>1:100 @ A3</div>		<div>Drawn:</div> <div>ADM</div>
<div>Date:</div> <div>October 2021</div>		
<div>Drawing No:</div> <div>ksd/21/36/03</div>		<div>Revision:</div>



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EXISTING SIDE ELEVATION

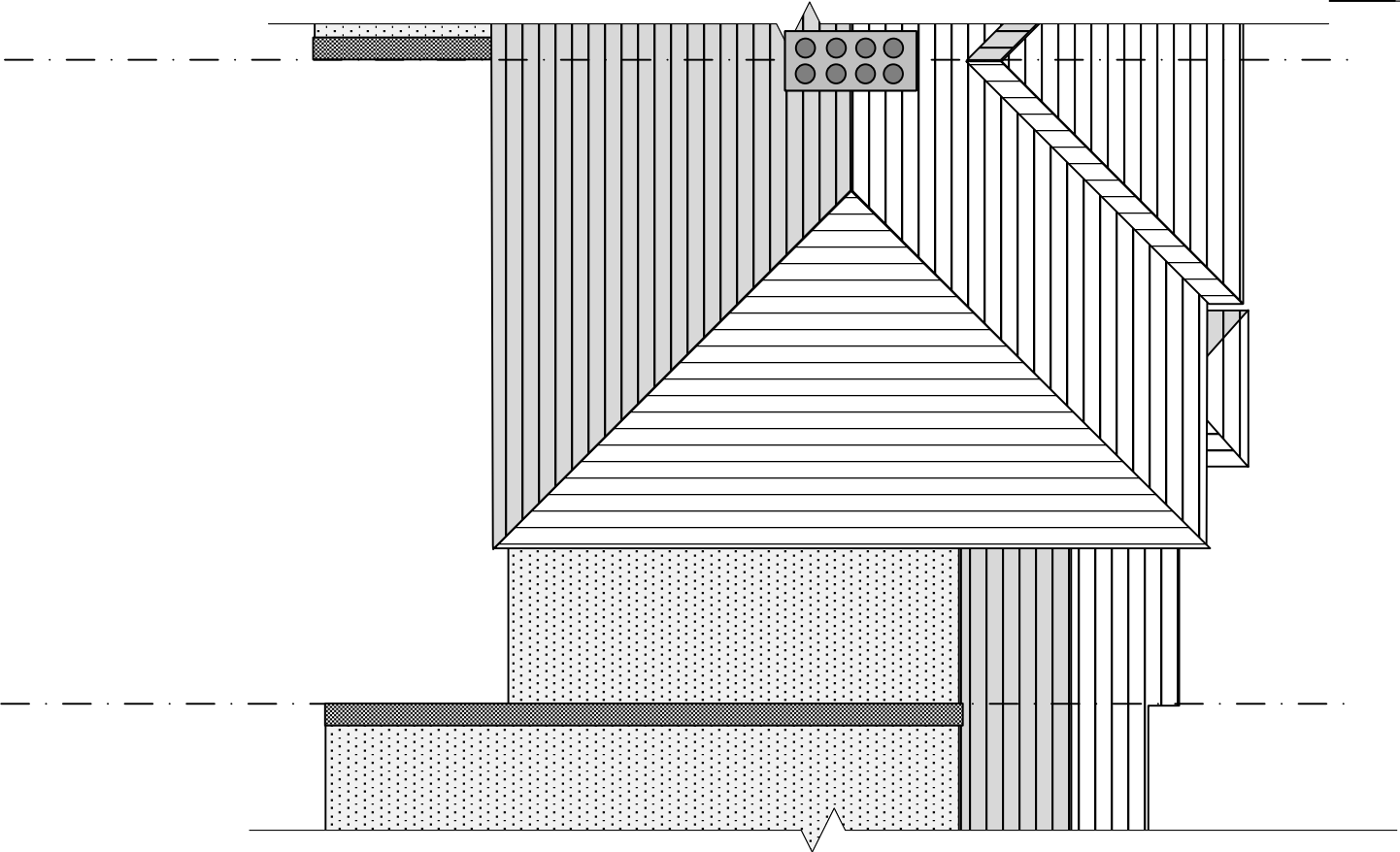


PROPOSED SIDE ELEVATION

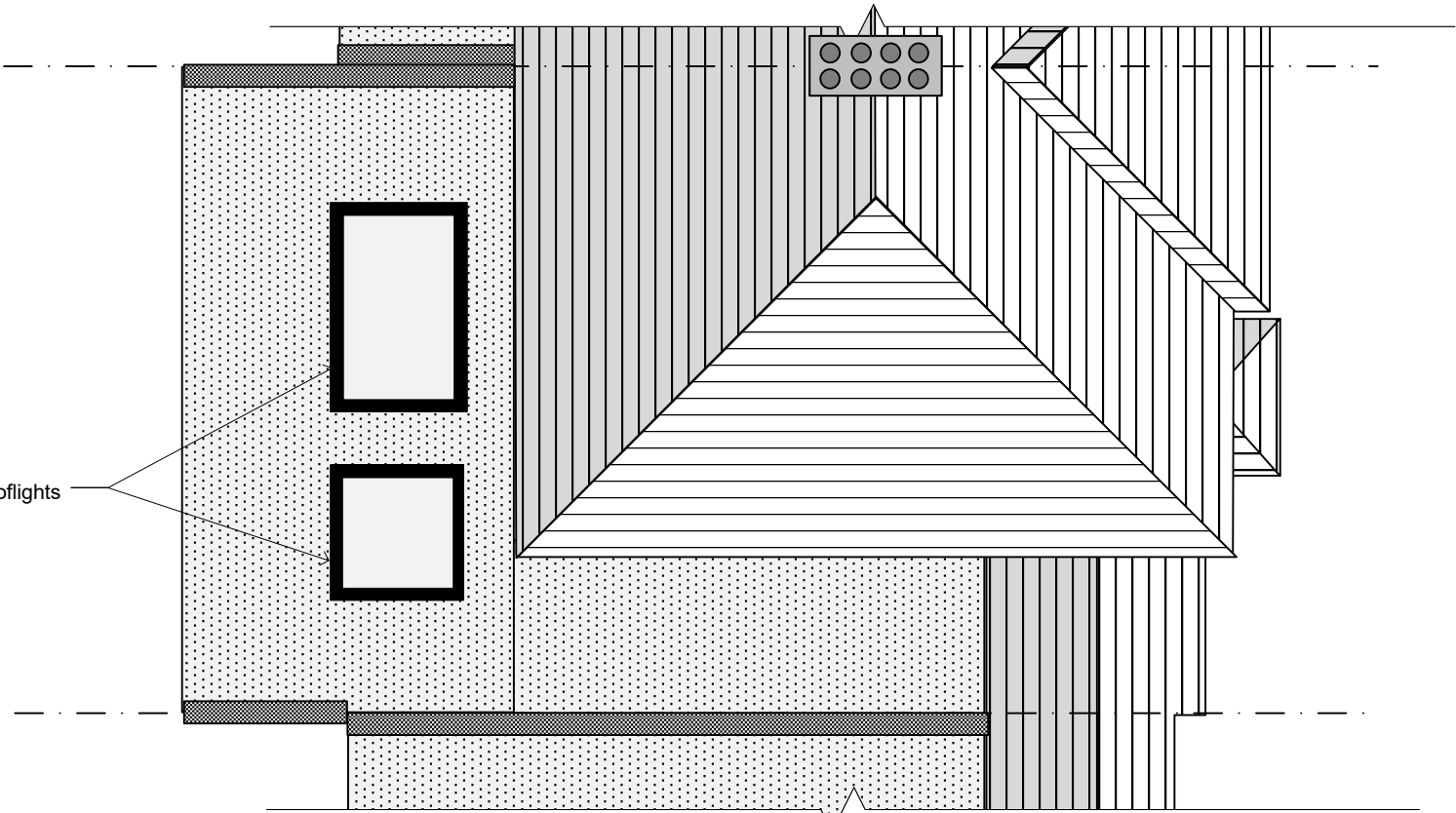
Rev	Description	Date
<div>K-Side Designs</div> <div>Planning, Building and Structural Consultants</div> <div>84 Kenilworth Avenue, London E17 4PE</div> <div>Tel: 020 8527 2660 07920 745138</div>		
Project: <div>11 Chaseville Park Road Winchmore Hill Enfield N21 1PH</div>		
Title: <div>Existing and Proposed Side Elevations</div>		
Scale: <div>1:100 @ A3</div>		Drawn: <div>ADM</div>
Date: <div>October 2021</div>		
Drawing No: <div>ksd/21/36/04</div>		Revision:



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EXISTING ROOF



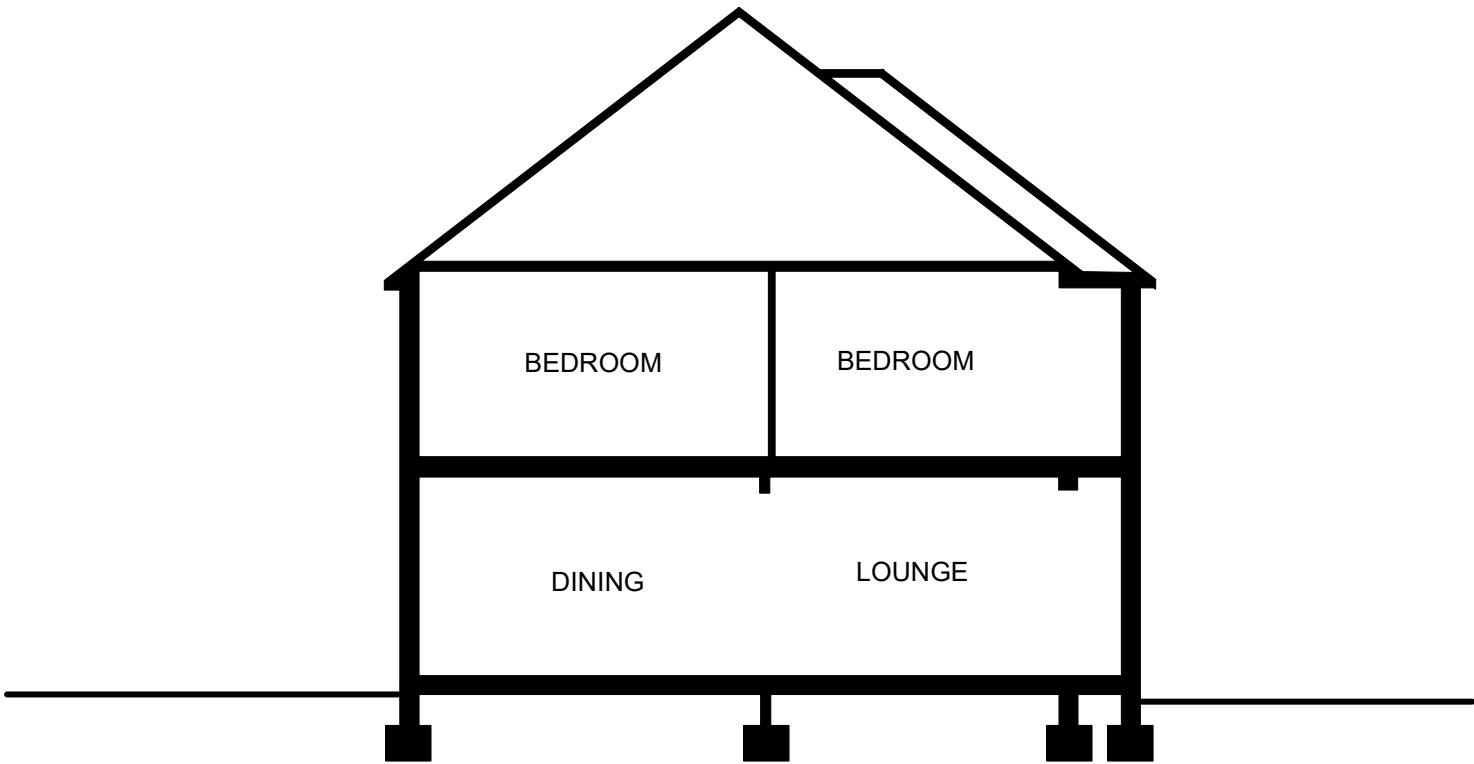
Flat glass rooflights

PROPOSED ROOF

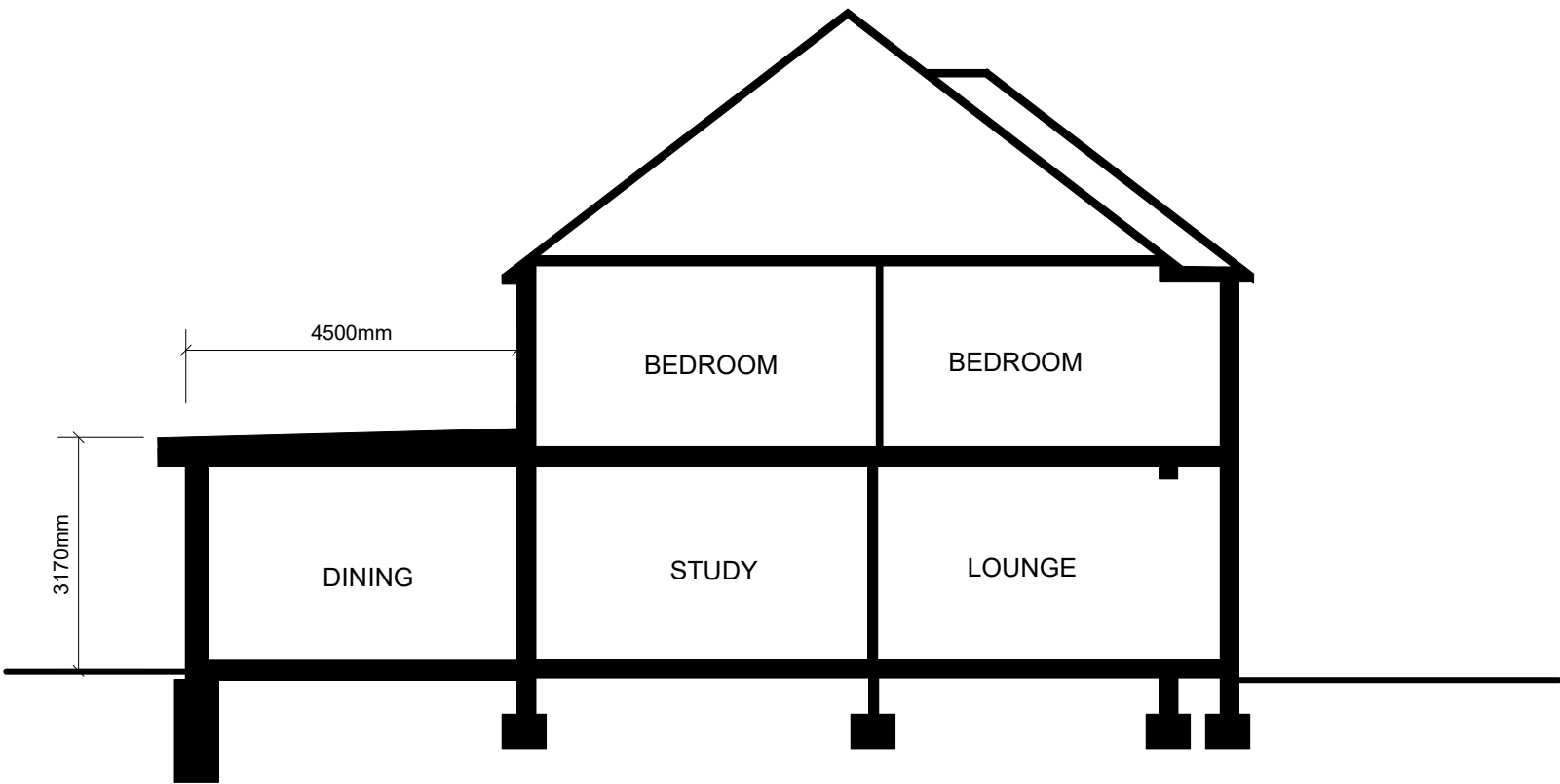
Rev	Description	Date
K-Side Designs Planning, Building and Structural Consultants 84 Kenilworth Avenue, London E17 4PE Tel: 020 8527 2660 07920 745138		
Project: 11 Chaseville Park Road Winchmore Hill Enfield N21 1PH		
Title: Existing and Proposed Roof Plans		
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Date: October 2021		
Drawing No: ksd/21/36/05	Revision:	



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EXISTING SECTION A-A

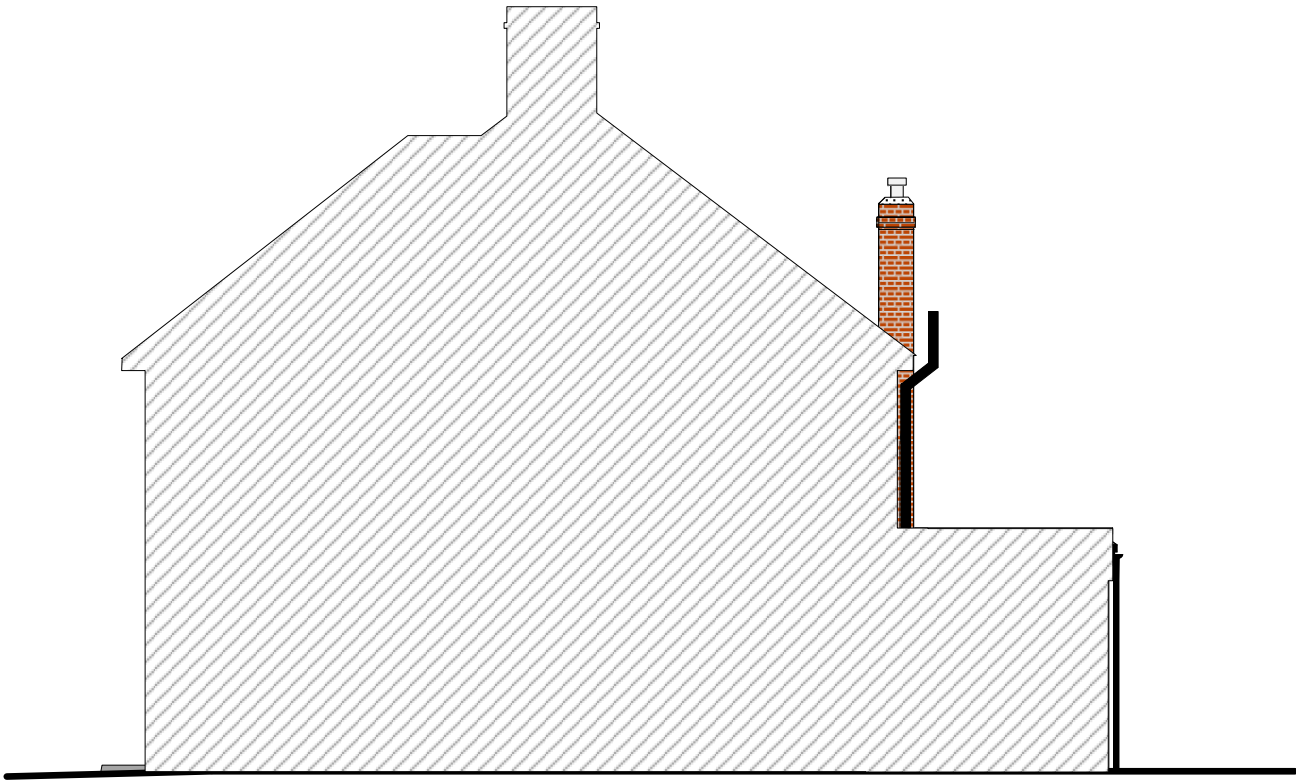


PROPOSED SECTION A-A

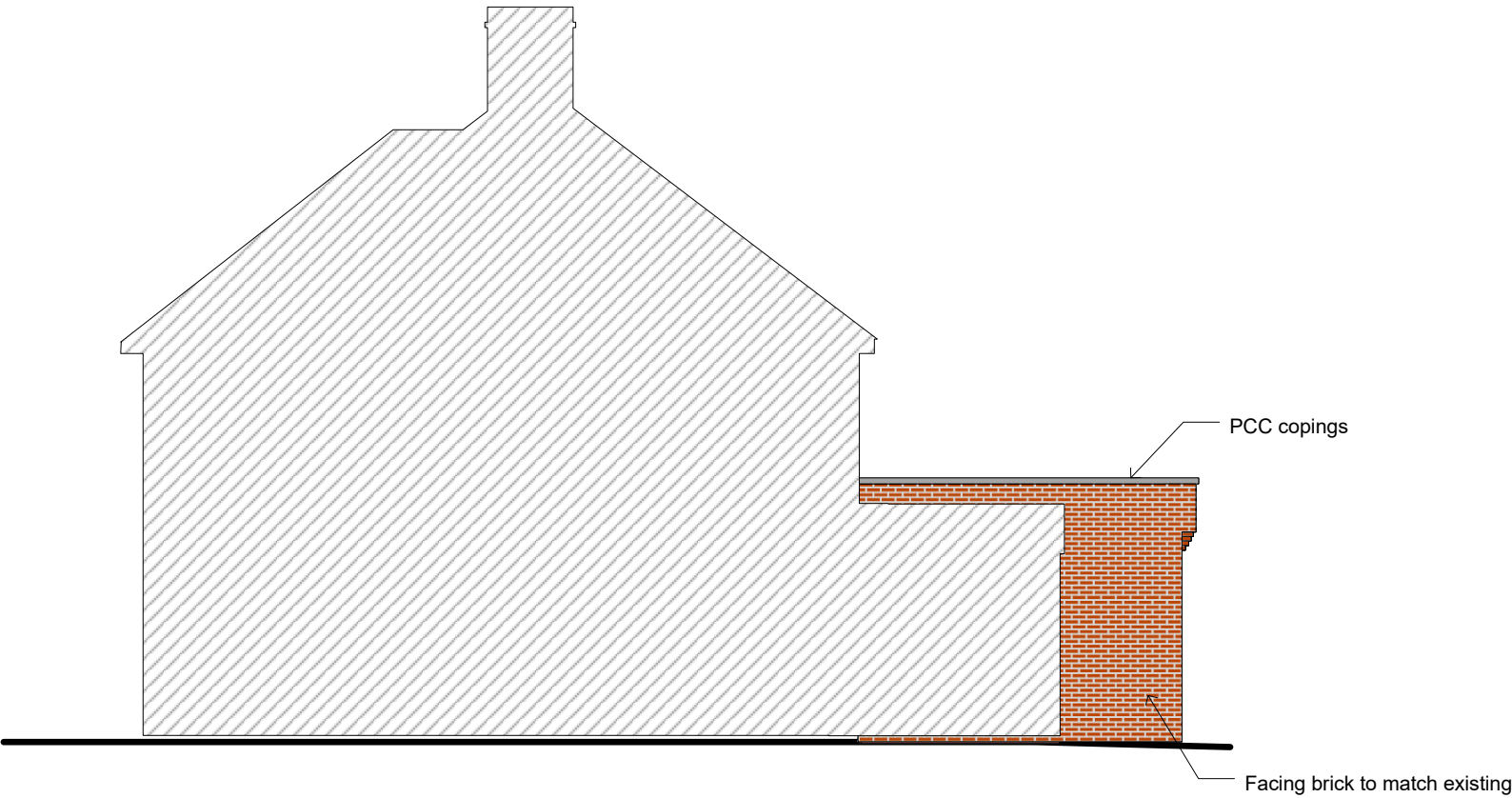
Rev	Description	Date
<div>K-Side Designs</div> <div>Planning, Building and Structural Consultants</div> <div>84 Kenilworth Avenue, London E17 4PE</div> <div>Tel: 020 8527 2660 07920 745138</div>		
<div>Project:</div> <div>11 Chaseville Park Road Winchmore Hill Enfield N21 1PH</div>		
<div>Title:</div> <div>Existing and Proposed Section A-A</div>		
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EXISTING SIDE ELEVATION



PROPOSED SIDE ELEVATION

Rev	Description	Date
<p>K-Side Designs Planning, Building and Structural Consultants</p> <p>84 Kenilworth Avenue, London E17 4PE</p> <p>Tel: 020 8527 2660 07920 745138</p>		
<p>Project:</p> <p>11 Chaseville Park Road Winchmore Hill Enfield N21 1PH</p>		
<p>Title:</p> <p>Existing and Proposed Side Elevations (as viewed from No 9)</p>		
<p>Scale:</p> <p>1:100 @ A3</p>		<p>Drawn:</p> <p>ADM</p>
<p>Date:</p> <p>October 2021</p>		
<p>Drawing No:</p> <p>ksd/21/36/04/1</p>		<p>Revision:</p>

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LONDON BOROUGH OF ENFIELD**PLANNING COMMITTEE****Date:** 4th January 2022**Report of**Head of Planning
- Vincent Lacovara**Contact Officer:**Andy Higham
David Gittens
Fidel Miller**Ward:**

Town

Ref: 21/03038/HOU**Category:** Householder**LOCATION:** 20 Chapel Street, Enfield, EN2 6QE


PROPOSAL: Demolition of lean-to extension and conservatory at rear and demolition of garage at front together with, single storey front extension with pitched roof, porthole window and front entrance porch, construction of flat roof on existing hipped roof at rear, replacement and increase in height of boundary wall with new timber gates at front, replacement of UPVC doors and windows throughout with crittall-style glazing.

Applicant Name & Address:Mr Timothy Leaver
20 Chapel Street
Enfield
EN2 6QE**Agent Name & Address:**Mr Robert Ware
Studio RW Architects
1 The Glass House
Royal Oak Yard
London
SE1 3GE**RECOMMENDATION:**

1. That the Head of Development Management be authorised to GRANT planning permission subject to conditions.
- 2, That delegated authority be granted to the Head of Development Management to finalise the wording of the conditions



North



1. Note for Members:

- 1.1. Although a planning application of this nature could be determined under delegated authority, the application is reported to Planning Committee as the applicant is a Councillor. In accordance with the approved scheme of delegation, applications submitted by Councillors or Officers cannot be determined by Officers under delegated powers, but must be considered and determined by the Planning Committee

2. Recommendation

- 2.1 The Head of Development Management / the Planning Decisions Manager be authorised to GRANT planning permission subject to the following conditions:

1. Time Limited Permission: The development to which this permission relates must be begun no later than three years after the date of this decision notice.

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

2. Approved Plans: The development hereby permitted shall be carried out in accordance with the approved plans: (E)001 Rev 00, (EX)001 Rev 00, (SITE)001 Rev 00, (P)001 Rev 02, (E)002 Rev 01, (S)001 Rev 01, Design Access and Heritage Statement

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

3. Materials: The external finishing materials shall match those used in the construction of the existing building and/or areas of hard surfacing.

Reason: To ensure a satisfactory appearance.

4. SUDS: The development above ground level shall not commence until information on Sustainable Drainage has been submitted to and approved in writing by the Local Planning Authority. The details shall be 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 include source control SuDS measures such as a green roof, rain gardens and permeable paving.
- b) The details submitted shall include levels, sizing, cross sections and specifications for all drainage features
- c) 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
- d) Clear ownership, management and maintenance arrangements must be established

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 Policy 61, and Policies SI 13 of the London Plan and the NPPF and to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value.

3 Executive Summary

- 3.1 This report outlines the material considerations in support of the recommendation to grant permission for the proposed development.
- 3.2 The proposed development due to its size, siting and design, is considered to relate well to the host property, street scene and wider conservation area. Further the proposal would not harm the residential amenity of neighbouring occupiers.
- 3.3 It is considered that the proposal meets the test for development within the setting of heritage assets and is acceptable subject to the aforementioned conditions.
- 3.4 The proposal is considered acceptable in relation to the following policies

4 Site and Surroundings

- 4.1. The application site is located on a corner plot bounded by Chapel Street to the north and west and comprises a detached single storey bungalow located to the north of 16 Chapel Street. To the rear, the application site shares a boundary with Clarendon Cottage which is a Grade II* listed building while to the north, the site is bounded by the rear garden of Eastbury which is a Grade II listed building.
- 4.2. The property features an outbuilding in the front garden which is set back behind front boundary walls approximately 1.8 metres in height. The character of Chapel Street is varied but consists of 5 detached bungalows. The subject property is not nationally or locally listed however it is located within the Enfield Town Conservation Area and is subject to an article 4 direction.



Application site outlined in red

5 Proposal

- 5.1 Permission is sought for the demolition of the lean-to extension and conservatory at rear of the property and the introduction of a flat roof with prism above the existing single rearward projection.
- 5.2 The proposal also involves the demolition of the detached garage in the forecourt and construction of a single storey front extension with a pitched roof and porthole window to align with the front building line of the demolished garage. This would incorporate an ensuite bedroom.
- 5.3 In addition, it is proposed to replace and increase the height of the front boundary wall to 1.8m with new timber gates at front together with replacement UPVC doors and windows with crittall-style glazing. The proposal would also involve the introduction of a bike store to the forecourt and landscaping to the front and rear.

6 Relevant Planning History

- TP/98/1404 - Replacement front gates - Granted with Conditions – 30/11/1998
- TP/98/1482 - Rear conservatory involving demolition of existing conservatory - Granted with Conditions – 04/01/1999

7 Consultations

7.1 Internal

Consultee	Date consulted	Summary of response
SUDS Highway Services	31.08.2021	No SuDS information has been submitted as part of this application. According to our DMD Policy, all minor developments must maximise the use of SuDS in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management Train. Source control SuDS measures (e.g. green roof, rain gardens and permeable paving) must be utilised for this development.

7.2 Public

Number notified	11
Consultation start date	02.09.2021
Consultation end date	26.09.2021
Representations made	2

Objections	1
Other/support comments	1
Summary of supporting comment	Generally, good design with strong case for rationalizing layout
Summary of objection	Loss of light

8 Relevant Policies

Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions of the development of the development plan so far as material to the application: and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.
National Planning Policy Framework (2021)

National Planning Policy Framework

London Plan (2021)

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 D3 - Optimising site capacity through the design-led approach
Policy D4 - Delivering Good Design
Policy HC1 - Heritage and Conservation
Policy SI 13 - Sustainable Drainage

Core Strategy (2010)

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.

- Policy CP 21 – Delivering sustainable water supply, drainage and sewerage Infrastructure
- Policy CP 30 - Maintaining and Improving the Quality of the Built and Open Environment
- Policy CP31 – Built and Landscape Heritage

Development Management Document (2014)

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.

The following local plan Development Management Document policies are considered particularly relevant:

- Policy DMD 11 – Rear Extensions
- Policy DMD 37 - Achieving High Quality and Design-Led Development
- Policy DMD 44 – Conserving and Enhancing Heritage Assets
- Policy DMD 61 – Managing Surface Water Runoff

Other relevant documents

- National Planning Practice Guidance (NPPG)
- Enfield Characterisation Study (2011)
- Enfield Town Conservation area character appraisal 2015

9 Analysis

9.1 The main planning issues raised by the proposed development are

- Heritage
- Visual Amenity
- Residential amenity
- Parking / Access
- Sustainable Urban Drainage

Effect on Conservation Area and Visual Amenity

- 9.2 Sections 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990; requires paying a special attention to the desirability of preserving or enhancing the character or appearance of conservation areas
- 9.3 Chapter 16 of the NPPF identifies the significance of heritage assets and places an importance on their conservation. Paragraph 199 states that when considering the impact of a proposed development 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Furthermore, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 9.4 These principles are incorporated into Policy HC1 of the London Plan and Policies CP31 and DMD 44 of the Core Strategy and Development Management Document respectively. In particular, DMD 44 states that applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused.
- 9.5 In addition, Policies D3 and D4 of the London Plan, policy CP30 of Enfield's Core Strategy and policies DMD6, DMD8, DMD37 and DMD 44 of the Council's Development Management Document all require proposals to be of high-quality design, having regard for their context and surroundings. Attention must be paid to the layout, orientation, scale, appearance and shape of the development, with

due regard to existing and emerging street hierarchy, building types, forms and proportions.

- 9.6 The application site is located within Enfield Town Conservation Area = with the Character Area placing the property in Character Area 3 (Chase Side, Chase Green and Gentleman's Row). It is identified as a negative building within the Conservation Area character appraisal.
- 9.7 In terms of the proposals, the demolition of the lean-to extension and conservatory at rear together with the introduction of a flat roof with prism above the existing single rearward projection is considered acceptable. These elements of the scheme would be confined to the rear of the property and would not have any impact on the street scene or conservation area. More importantly, it is considered that the form and appearance of these elements would not harm the setting of the adjoining listed buildings to the north and west of the application site.
- 9.8 The proposed demolition of the detached garage in the forecourt while it currently forms part of the street scene, would not adversely impact its character. The proposed forward projection of the replacement structure incorporating an ensuite with pitched roof and porthole window, would align with the front building line of the existing garage. The appearance of the porthole window within the street scene and wider conservation area would not be a significant detraction especially when it is noted there is a similar feature at no.12 Chapel Street.
- 9.9 In respect to its relationship to the established pattern of development, the property forms part of a group of 3 bungalows, sharing an alignment with the front building lines of Nos.16 and 14 to the south. While the proposed development would not be consistent with this alignment, weight can be given to the fact that the extension would be sited behind the front boundary wall, it is set back from the public footpath and the presence of the existing structure. AS a result, this difference is not considered material and the proposal following the revisions negotiated , is considered acceptable.
- 9.10 The proposed replacement and increased height of the front boundary wall to 1.8m with new timber gates at front gate would be acceptable. The proposed replacement of UPVC doors and windows with crittall-style glazing are considered to be acceptable. The proposed introduction of a bike store to the forecourt and landscaping to the front and rear are considered to be acceptable.
- 9.11 The proposals have been subject to revision to result in a form of development that is felt to more sympathetic to the form and appearance of the Conservation Area and the wider visual amenities of the area.
- 9.12 In this context, it is considered that the proposed development would not result in any harm to the setting and appearance of the identified heritage assets having regard to Policy HC1 of the London Plan, Policy CP31 of the Core Strategy and Policy DMD 44 of the Development Management Document

Neighbouring Amenity

- 9.13 Policy D3 of the London Plan asserts that decision makers should consider appropriate outlook, privacy and amenity (D3(d7)) with regard to development proposals. Furthermore, the Council's Development Management Document requires that proposed development causes no adverse impact on the

amenities of the original building and its neighbouring properties. In particular, Policies DMD8, DMD11 & DMD12 require new development and extensions to safeguard residential amenity having regard to daylight, sunlight, outlook, privacy, overlooking, noise and disturbance

- 9.14 The properties most impacted by the proposal are 16 Chapel Street, Eastbury and Clarendon Cottage.
- 9.15 The proposed forward projection would be located adjacent to the shared boundary treatment with no.16 to the south. The height of the existing boundary treatment is 2.15m and the height of the eaves of the proposed forward projection would be 2.3m which is comparable to the height of the existing outbuilding.
- 9.16 While it is acknowledged that no.16 features a window opening adjacent to the shared boundary it is considered there is minimal difference in height between existing and proposed which would not cause any significant loss of access to natural daylight and sunlight to the adjacent property. This is by virtue of the indiscernible difference in height above the boundary treatment in conjunction with the pitch of the gable ended roof. In addition, the newly created porthole window opening in the gable is not considered to cause any loss of privacy to any of the neighbouring occupiers.
- 9.17 The proposed works to the rear of the property would not have any adverse impact on the residential amenity of any of the neighbouring occupiers by virtue of its subordinate mass, siting and separation distance from the occupiers of the adjacent properties.
- 9.18 For the reasons considered above the proposal would not harm the residential amenity of neighbouring occupiers and would therefore be consistent with Policies DMD 11 of the Development management Document 2016 and D3 of the London Plan 2021.

Parking and Access

- 9.19 No objection is raised to the demolition of the existing garage given the availability of alternative parking space within the application site.

Sustainable Urban Drainage

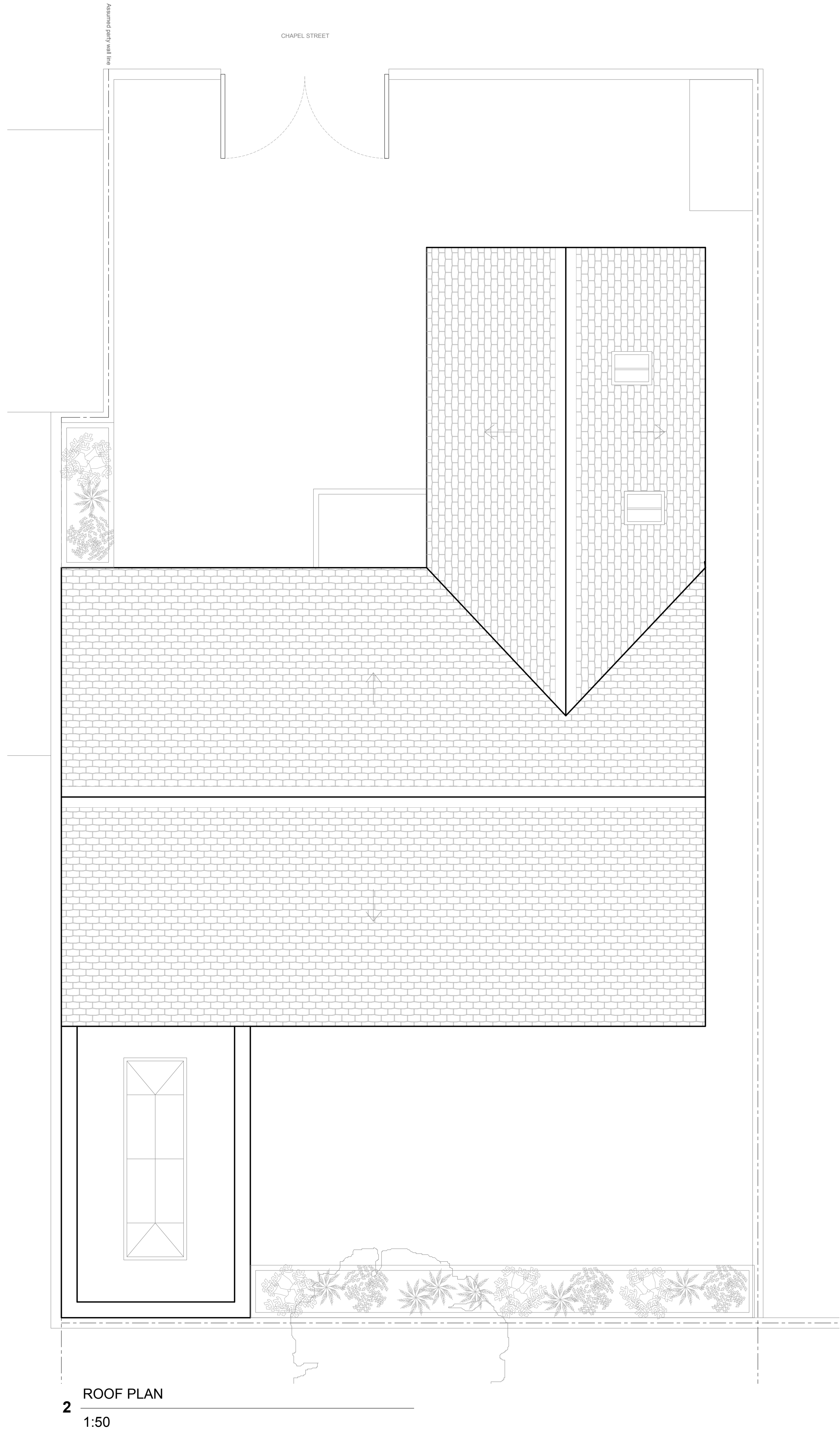
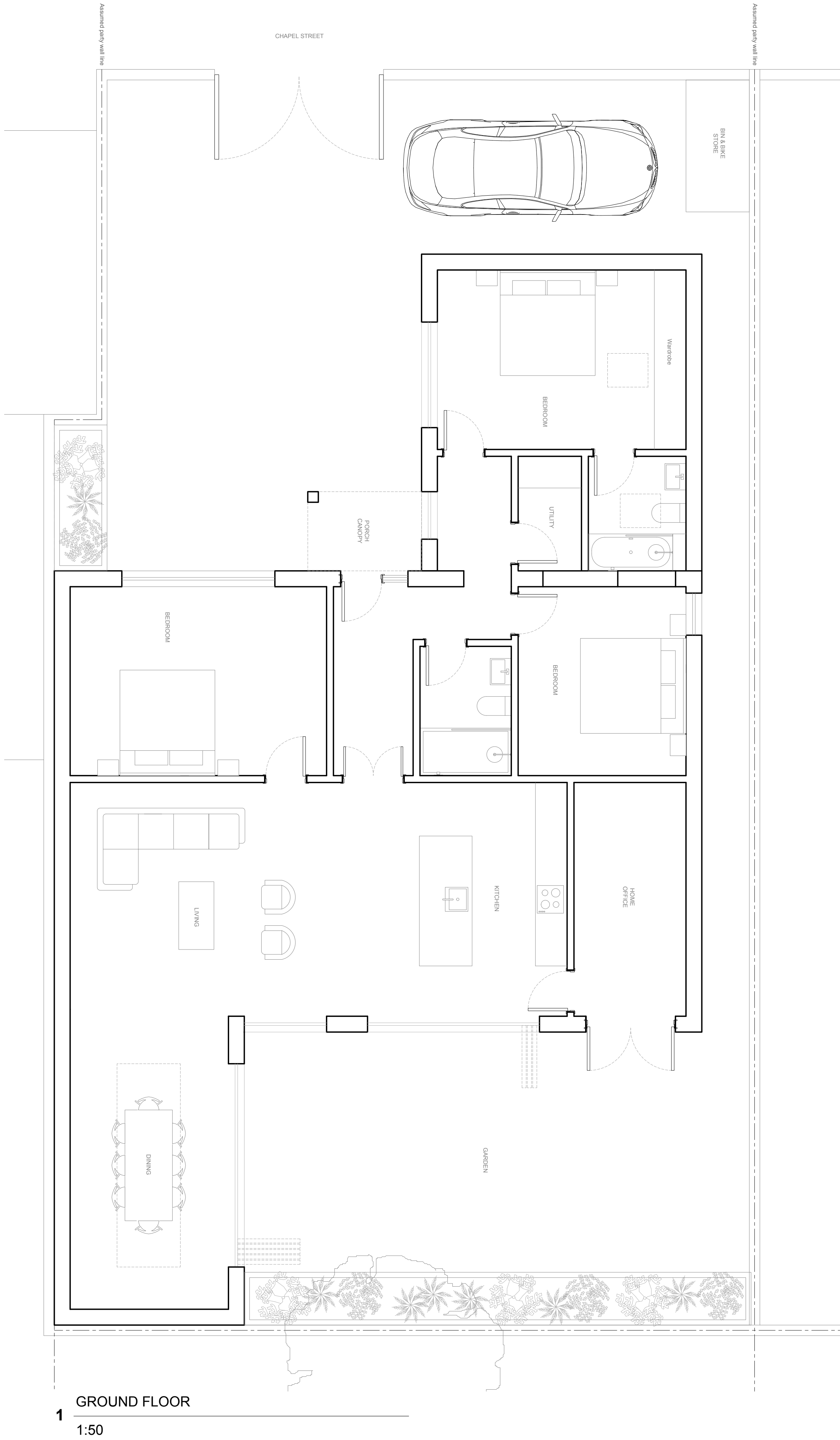
- 9.20 In accordance with the Council's DMD Policy, all minor developments must maximise the use of SuDS in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management Train. The Council's drainage officer recommends that source control SuDS measures (e.g. green roof, rain gardens and permeable paving) must be utilised in this instance.
- 9.21 A condition has been attached that requires these details to be submitted in support of the planning application. This will ensure compliance with policies DMD 61 of the Enfield Development Management Document (2014), CP21 of the Enfield Core Strategy (2010), the Enfield Strategic Flood Risk Assessment (2008), SI 13 of the London Plan (2021) and the National Planning Policy Framework (2021) as a whole

10.0 Public Sector Equalities Duty

- 10.1 Under the Public Sector Equalities Duty, an equalities impact assessment has been undertaken. It is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

11. Conclusion

- 11.1 Having regard to the above assessment, the proposed development will not have an unacceptable impact on the subject property or wider conservation area or the residential amenity of neighbouring occupiers. The proposal therefore accords with London Plan (2021) policies D3, D4, HC1 Core Policies 30 & 31 of the Council's Core Strategy (2010), and, Policies DMD6, DMD8, DMD37 and DMD 44 of the Council's Development Management Document (2014) and the NPPF taken as a whole.



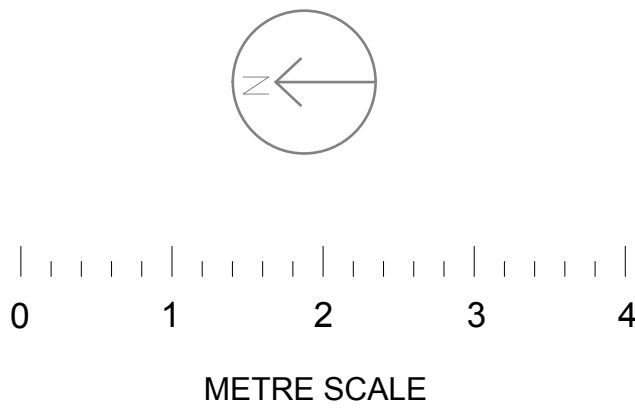
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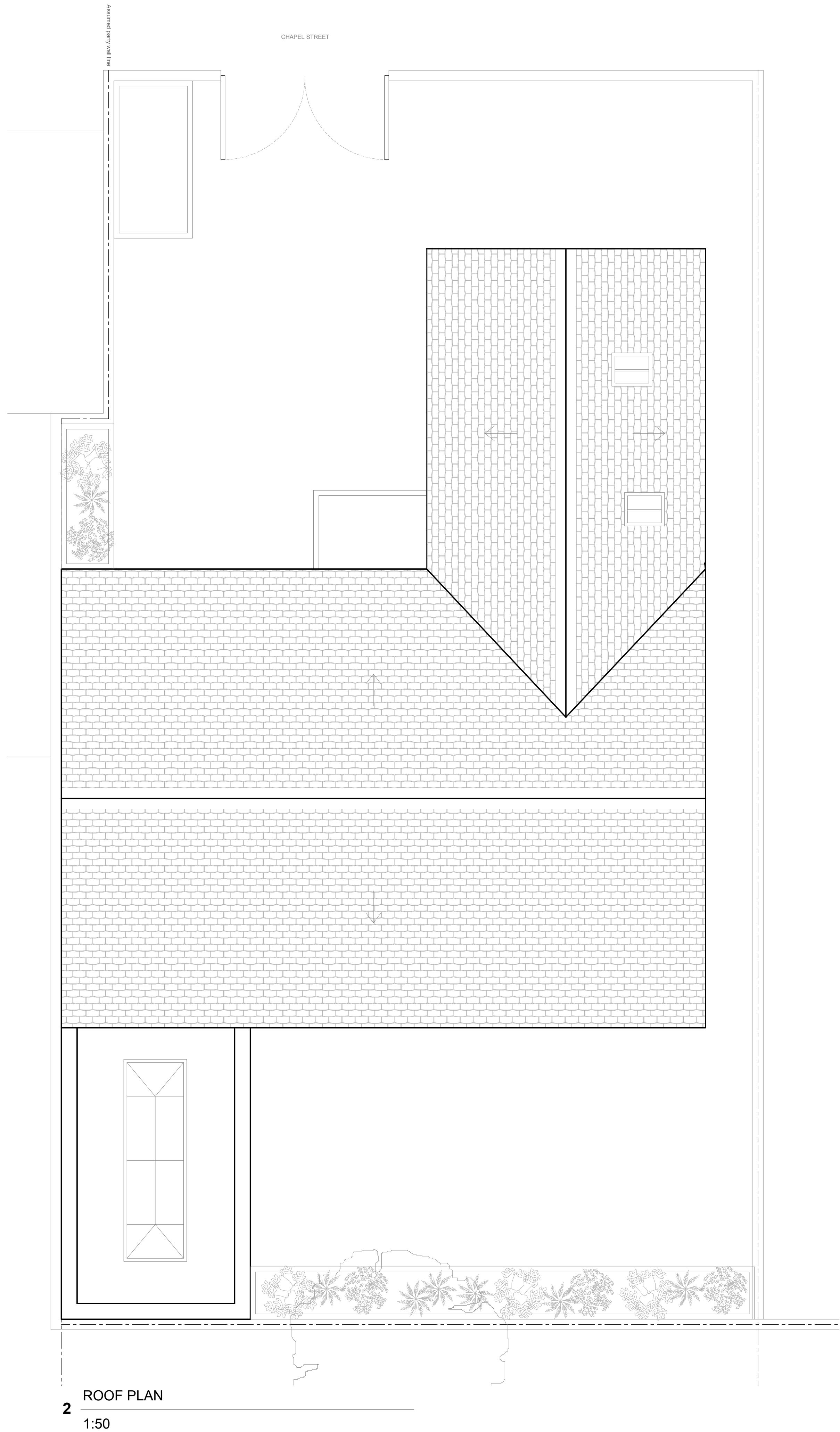
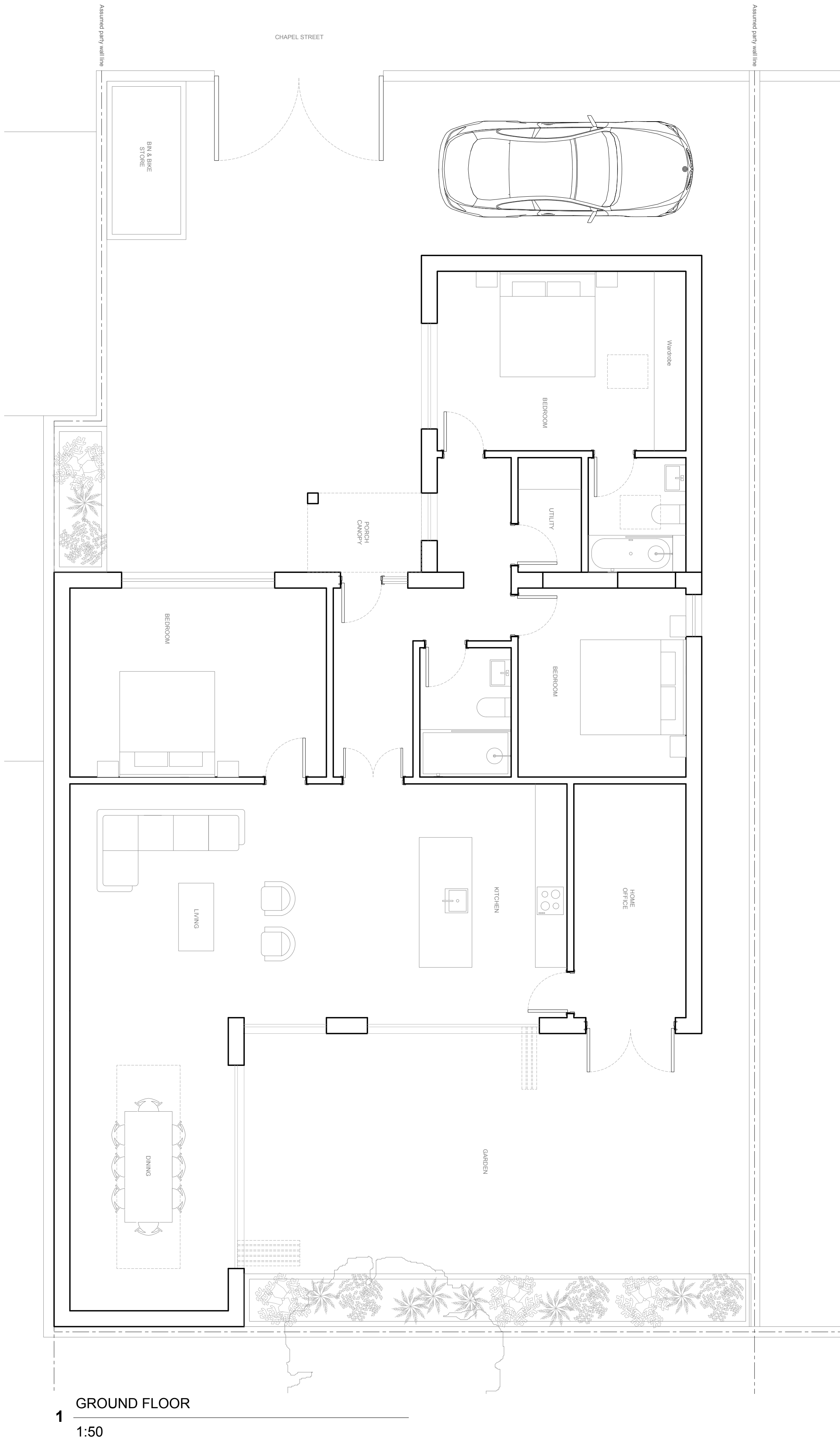
NOTES

****All structure shown on architects drawings is for reference only. Refer to structural engineer's drawings and calculations for all foundations and structural design.**

Drawing Name	
Proposed Plans	
Address	
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Client	
CAROLINE & TIM	
Job	Drawing Number
037	(P)001
Rev	Date of issue
02	12.10.21
Paper Size	Scale
A1 / A3	1:50 / 1:100

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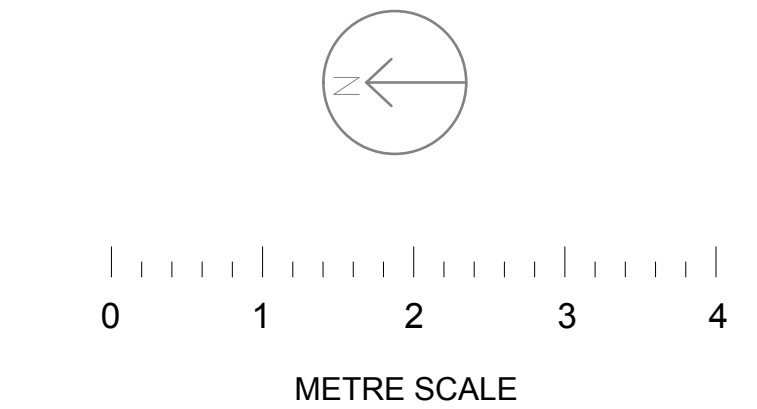
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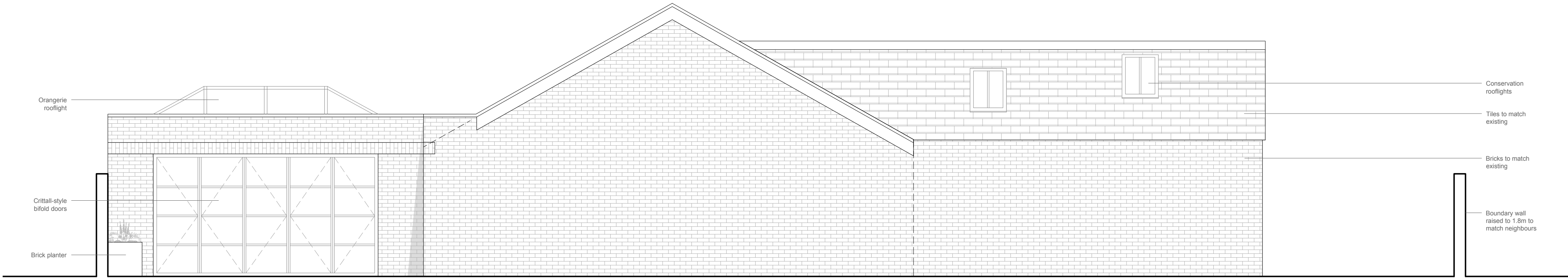
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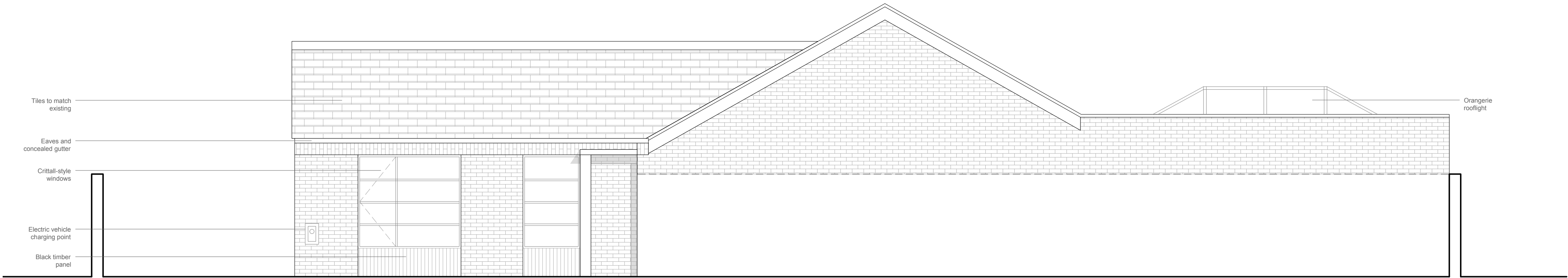
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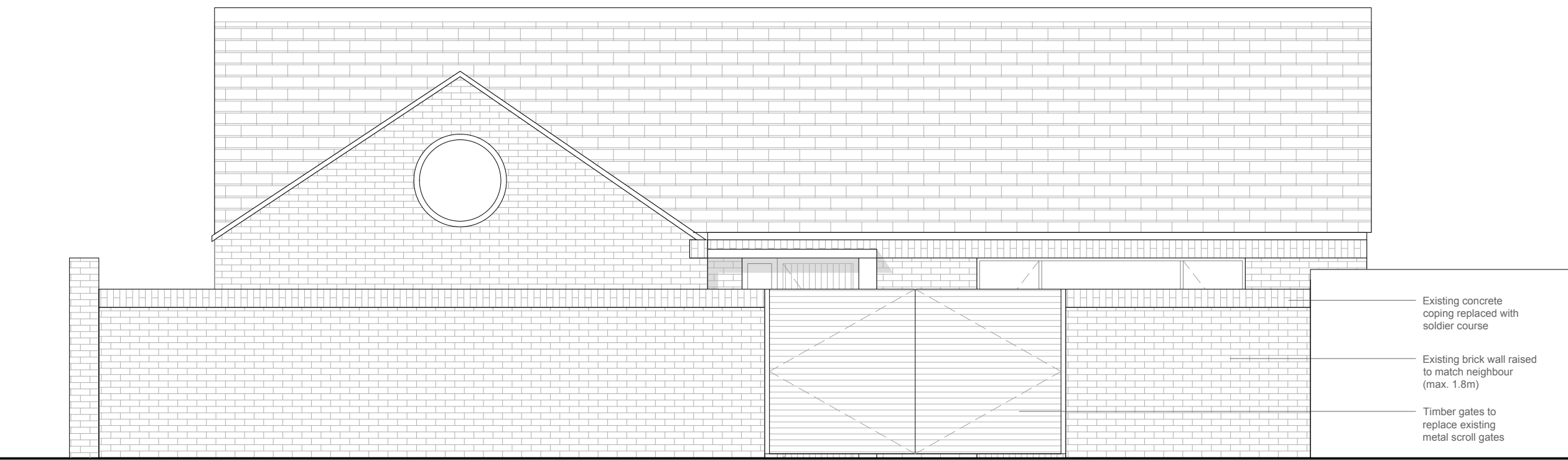
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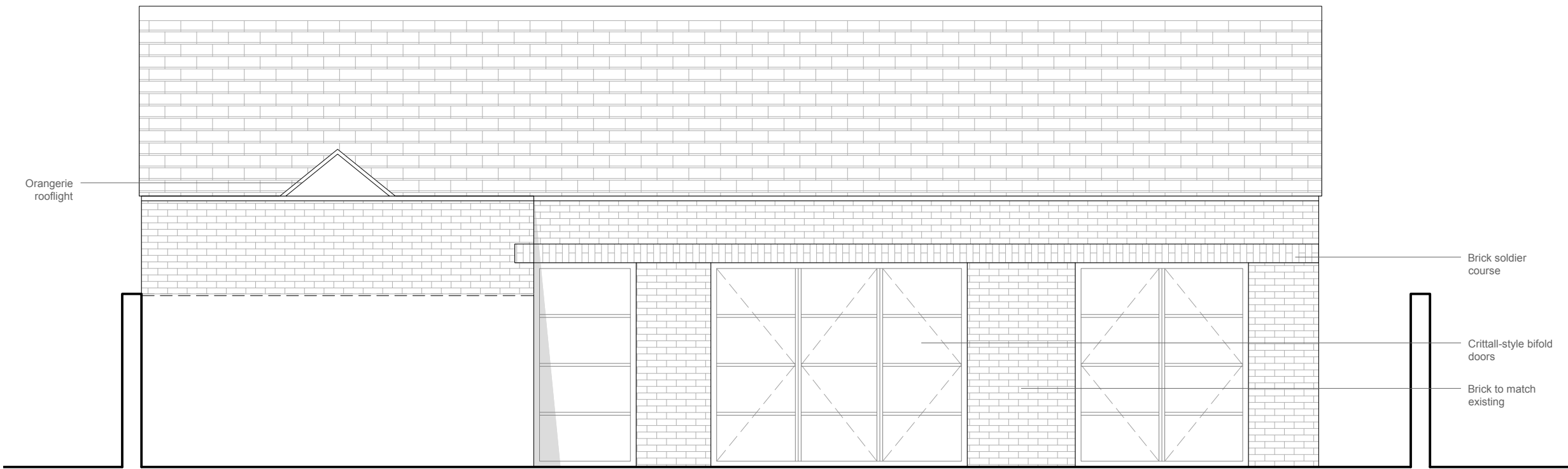
3 EAST ELEVATION

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5 EAST ELEVATION (FROM CHAPEL STREET)

1:50



4 WEST ELEVATION

1:50

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Drawing Name

Proposed Elevations

Address

20 CHAPEL STREET, EN2 6QE

Client

CAROLINE & TIM

Job

Drawing Number

037

(E)002

Rev

Date of issue

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Paper Size

Scale

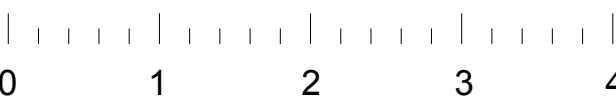
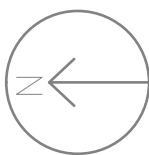
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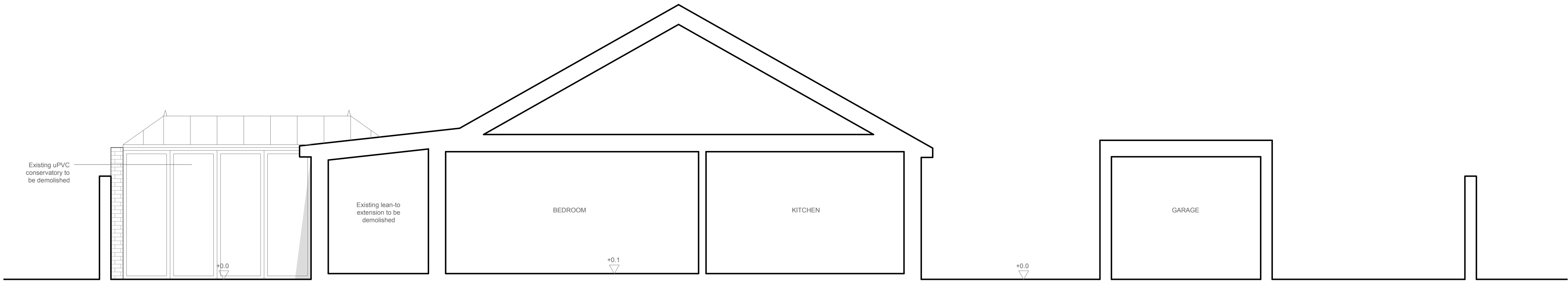
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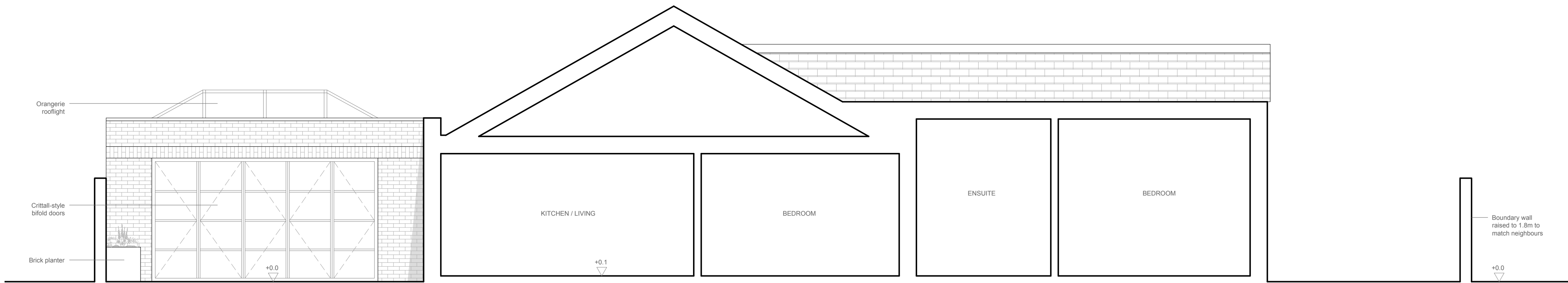
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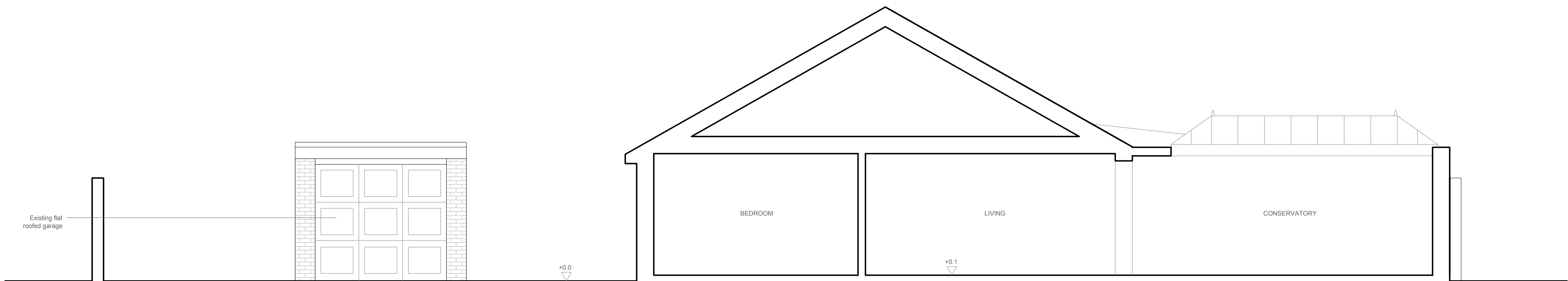
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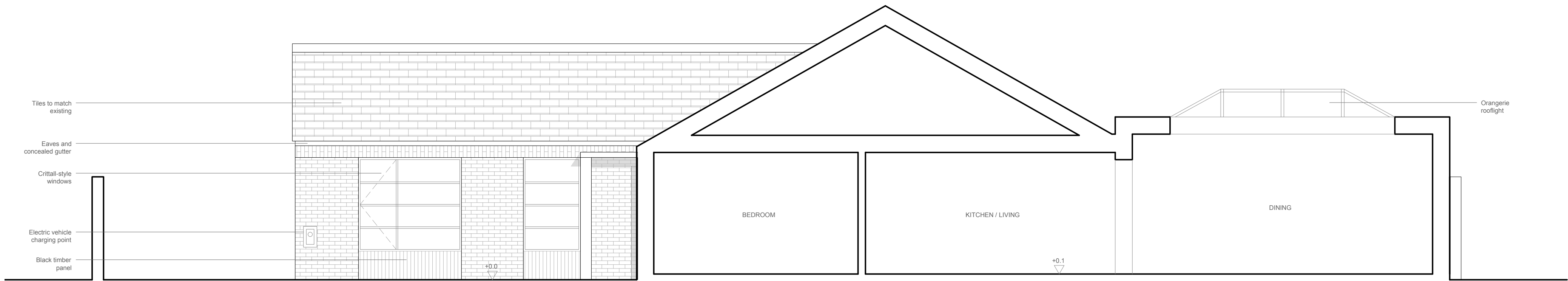
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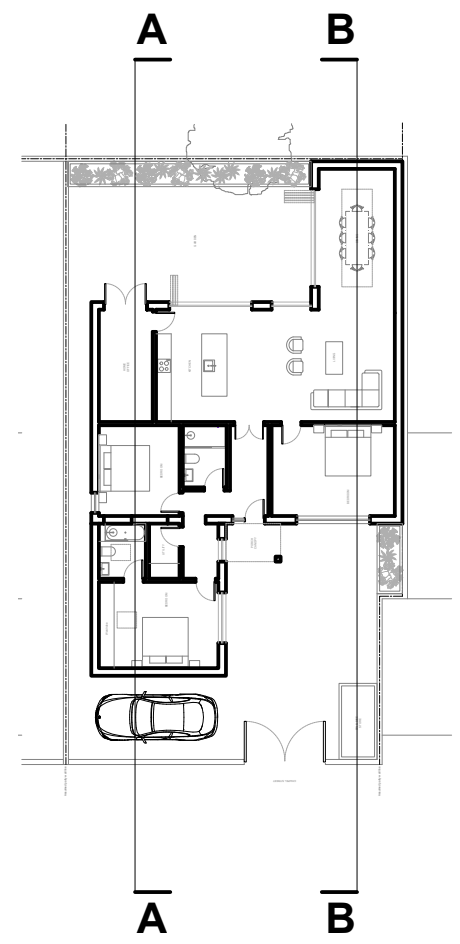
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3 SECTION B-B EXISTING
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4 SECTION B-B PROPOSED
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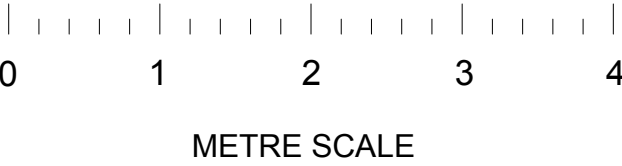
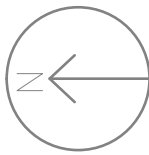
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LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 4th January 2022

Report of

Head of Planning
- Vincent Lacovara

Contact Officer:

Andy Higham
David Gittens
Kate Perry

Ward:

Grange

Ref: 20/02858/FUL

Category: Full Application

LOCATION: 100 Church Street, Enfield, EN2 6BQ

PROPOSAL: Redevelopment of site involving demolition of buildings and erection of residential units with associated car parking, cycle parking and landscaping (Revised Drawings received July 2021)

Applicant Name & Address:

HPJ 11 Developments Ltd
C/O Agent

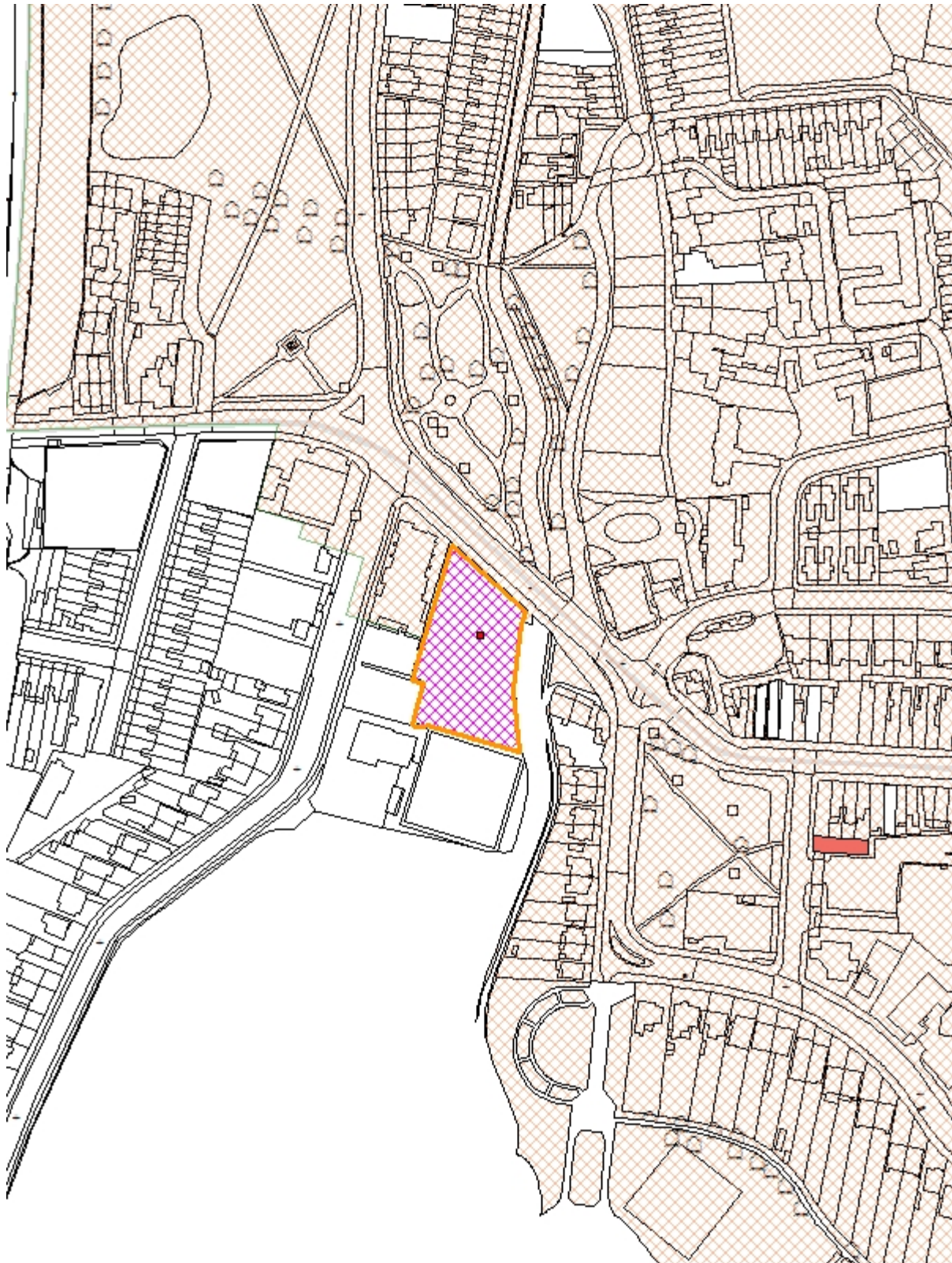
Agent Name & Address:

Mrs Mairead Flower
Iceni Projects
Da Vinci House
44 Saffron Hill
London
EC1N 8FH

RECOMMENDATION:

1. That subject to the finalisation of a S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions.
2. That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

Ref: 20/02858/FUL LOCATION: 100 Church Street, Enfield, EN2 6BQ,



1. Note for Members

- 1.1 At the meeting of Planning Committee on 26th October, members were minded to refuse planning permission but resolved to defer making a final decision to enable officers to prepare detailed reasons for refusal based on the concerns identified at the meeting. The reasons to be brought back to a future Planning Committee for consideration.
- 1.2 The resolution of Planning Committee identified three grounds of concern:
- i) the bulk, mass and height of the development relative to setting of heritage assets identifying the proximity to and effect on the setting of the New River, the Drill Hall on Old Park Ridings, the War Memorial on Chase Green and Genotin Terrace which did not outweigh the public benefits of the scheme.
 - ii) the residential mix and the number of 1 and 2-bedroom residential units as opposed to family units for which there is the greatest local need.
 - iii) the bulk, mass and height of the development relative to the impact on the character and appearance of the area.
- 1.3 Following the resolution of Planning Committee on 26th October 2021, the Applicant responded to the concerns identified by Members with the following offer to revise the current planning application:
- A 'without prejudice' offer of 2 x additional London Affordable Rent homes (1x2B3P and 1x2B4P) on ground and first floor in northern block, increasing the proposed level of affordable housing from 14.2% to 16.7% on a habitable room basis.
 - A commitment to a detailed planning condition and S106 planning obligation to secure appropriate treatment of the river frontage, in terms of landscape design, boundary treatment, and long-term maintenance.
- 1.4 A report was presented to Planning Committee on 23rd November when Members resolved in light of the additional information as set out in this report, to defer the application to enable the additional information to be assessed.
- 1.5 This report on the proposed development has been updated to reflect the assessment of the additional information and updates to be further assessed.
- 1.6 For clarification, this planning application is categorised as a "major" planning application and in accordance with the scheme of delegation, is required to be reported Planning Committee for determination.

2. Executive Summary

- 2.1 The application proposes a high-quality residential development on existing underutilised, highly sustainable brownfield land which is identified for re-development in the Enfield Town Masterplan (2018).
- 2.2 There is a pressing need for housing, including affordable housing, and Enfield has an extremely challenging 10-year housing delivery target. This application proposes

78 new homes including 9 units of affordable housing: an increase of two over the previous offer.

- 2.3 The proposal is located within Enfield Town Conservation Area and is in close proximity to other identified heritage assets, including Listed and Locally Listed buildings. The proposal is identified as causing 'less than substantial harm' on these assets. In accordance with the NPPF, where 'less than substantial harm' is identified the decision maker must weigh the identified harm against any public benefits of the proposal. In this instance, Officers consider that the public benefits of the proposal (primarily through the provision of housing) outweigh the 'less than substantial harm' identified.
- 2.4 As such, in accordance with the NPPF (paragraph 11d), the 'tilted balance' assessment is engaged where planning permission should be granted unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".
- 2.5 Officers acknowledge that due to the quantum of homes proposed, and the resultant extent of site coverage, there are shortcomings to this proposal. These are identified in the analysis section of this report. However, the development is considered to be high quality in terms of its design using a mansion block typology. The design also demonstrates high quality architectural detailing and materials resulting in an acceptable appearance. Having regard to the Borough's position in terms of housing delivery and the consequent presumption in favour of sustainable development, the deficiencies in the proposal both individually and cumulatively are not considered to significantly and demonstrably outweigh the benefits.
- 2.6 The primary public benefits of the scheme can be summarised as follows:
 - Optimising the site – making effective use of a highly sustainable highly accessible brownfield site;
 - Housing – making a significant contribution to the Borough's housing delivery, including affordable housing.
 - Social and economic benefits - providing jobs during construction and increasing footfall in the town centre
 - Landscape and biodiversity enhancements
 - Minimising Green House Gas Emissions and exceeding London Plan minimum energy reduction target baselines; and
 - An improvement in on-site sustainable urban drainage (water management).
- 2.7 Furthermore, it has been recognised that:
 - The development by virtue of its size, location and proximity would not unacceptably harm the amenity of occupying and neighbouring residents.
 - The proposals would not cause any unacceptable harm upon highway safety or the flow of traffic in the locality.
- 2.8 The development would be appropriate and broadly in accordance with relevant National and Regional Policy, Core Strategy and Development Management policies.

3. Recommendation / Conditions

3.1 That subject to the finalisation of a S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions to cover the following matters:

1. Time limit - Full
2. Development in accordance with approved drawings and documents
3. Housing mix
4. Accessible housing
5. Materials – including samples and 1-1 mock-ups on site
6. Surfacing materials – including samples
7. Detailed drawings of key thresholds, openings, parapets, typical bays etc
8. Details of all structures and plant on roofs – including detailed drawings and views
9. Details of all means of enclosure - site boundary and within site: terraces and balconies
10. Secure by Design
11. Acoustic report - plant
12. Contamination Report
13. Contamination remediation strategy
14. Unidentified contamination
15. Air quality mitigation
16. Non-road mobile machinery
17. Impact piling
18. Construction Dust Management Plan
19. Fire strategy
20. Detailed tree Protection scheme including auditable schedule of arboricultural supervision/ inspection
21. Detailed Landscaping proposals including UGF
22. Landscaping management plan
23. Details of external lighting
24. Vegetation clearance outside of Bird nesting season
25. Works to stop if evidence of bat identified
26. Ecological enhancements
27. Green roof - details
28. Energy – compliance with strategy
29. Energy performance certificates
30. Mechanical ventilation system details
31. Provision of blue badge parking and retention for use by private motor vehicles
32. EV charging – one space
33. Construction traffic logistics plan
34. Visitor cycle parking – 4 spaces
35. Cycle door widths – minimum 1.2m opening
36. Delivery and service plan
37. Obscure glazing – west elevation
38. SUDs - final strategy
39. SUDs - verification report
40. Water efficiency
41. Thames Water - construction within 5m of assets
42. Piling Method statement - in relation to sewerage infrastructure
43. Satellite Dish/ TV – communal antenna
44. Levels

Informatives

1. In aiming to satisfy condition 10 (SBD) the applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via *docomailbox.ne@met.police.uk* or 0208 217 3813.
2. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 3.2 That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

4. Site and Surroundings

- 4.1 The site is located on the southern side of Church Street. It is currently occupied by an (up to) four storey vacant office building fronting on to Church Street. The building was previously occupied by Metaswitch who have re-located to new offices situated within Enfield Town. The site is located adjacent to St Pauls Church and Community Centre and Nos 2-6 Old Park Avenue to the west and the New River to the east. To the south of the site is Enfield Town Conservative Club and bowls green. Car parking is available to the rear of the existing building which is accessed via Old Park Ridings.
- 4.2 The site is located within the Enfield Town Conservation Area and there are a number of other identified heritage assets within the immediate vicinity of the site including Listed and Locally Listed buildings.
- 4.3 The site is located between Enfield Town (classified as a Major Centre) and Enfield Chase (classified as a Local Centre). The site falls within the Enfield Town Masterplan area and is identified for re-development.
- 4.4 The New River runs alongside the site, bordering it to the east and continuing to the north. This is designated as a site of Local Importance for Nature Conservation, a wildlife corridor and also forms part of the Green Chain corridor.
- 4.5 The site is well connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 6a ('excellent'). The site is within walking distance of both Enfield Chase and Enfield Town railway stations and there are numerous bus routes along Church Street.

5.0 Proposal

- 5.1 The proposal is for the redevelopment of the site to provide 78 residential units (Class C3). The development would involve the demolition of the existing vacant office building and the erection of two residential blocks. The northern block, fronting Church Street, would comprise 30 units of accommodation over 5 storeys and would accommodate a mix of private and affordable housing. The southern block would comprise 48 private residential units over 6 storeys.

- 5.2 The architects have adopted what is described as a 'mansion block' typology with a focus on creating a high density, high quality flatted development. A feature of this typology is that they have central points of pedestrian access with internal corridors and circulation spaces leading to individual flats. Bay windows are employed to maintain a familiar sense of domesticity and character despite the overall scale and density of the buildings.
- 5.3 Three parking spaces for blue badge holders are proposed on site. 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 air quality and climate change by facilitating such measures as car free development where there is are excellent public transport links (in this case PTAL 6a, excellent).
- 5.4 140 long stay cycle parking spaces are proposed – 36 two-tier spaces are proposed at ground floor level in the southern block. In the northern block at basement level 96 two-tier spaces are proposed. At ground floor level in the northern block, 8 Sheffield stand spaces are proposed. Four short stay cycle parking spaces are proposed within the external parking/ courtyard (siting to be agreed by condition).
- 5.5 The revised scheme proposes the provision of 16.7% affordable housing (by habitable room): an increase from 14.2% over that previous proposed. All the affordable units will be provided as London Affordable Rent (LAR). The proposed housing mix is set out below:

Total by Units

Units	Number	% of total
3b4p	4	5.12%
2b4p	29	37.18%
2b3p	12	15.38%
1b2p	33	42.31 %
Total	78	

- 5.6 Broken down by tenure, the development will provide:

Private

Units	Number	% of total private
3b4p	0	0
2b4p	25	36.23
2b3p	11	15.9
1b2p	33	47.82

London Affordable Rent

Units	Number	% of total affordable
3b4p	4	44.44
2b4p	4	33.33
2b3p	1	11.11
2b3p	0	0
1b2p	0	0

- 5.7 Each residential unit will have access to a private balcony or terrace, in addition to 172sqm of dedicated play space for children with further opportunities for informal play around the wider site.
- 5.8 Residential quality is considered in the assessment section of the report below. The new homes are proposed to meet or exceed Nationally Described Space Standards and all new homes are proposed to meet building regulations Part M4(2) standards and the London Plan.
- 5.9 The application documents demonstrate how the scheme has evolved through the pre-application process, through to submission. The scheme was subject to pre-application discussion and engagement. Pre-application engagement included meetings and workshops with Council Officers, independent design review by Enfield Design Review Panel, 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. A Statement of Community Involvement (SCI) has been submitted as part of the application to demonstrate how the applicants have engaged with the local community.

6.0 Relevant Planning Decisions

- 6.1 The existing office building was granted under planning reference TP/87/1370 for the erection of a 4-storey office building with surface parking area for 70 cars (including 20 spaces for St Pauls Centre) involving vehicular access to Old Park Avenue. It was granted on 8.1.1988.
- 6.2 This building was most recently occupied by the company Metaswitch. However, in 2018 they gained planning permission under reference 18/03009/FUL to build a new office development on the former Genotin Road car park site in Enfield Town. This left the original Metaswitch building vacant.
- 6.3 The vacant site is identified for re-development within the Enfield Plan Masterplan 2018.

7.0 Consultation

- 7.1 In December 2020, 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.
- 7.2 The SCI recognises that the Council will aim 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 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.
- 7.3 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. As noted above, the applicant undertook pre-submission engagement with the local community.

Public Consultation

- 7.4 Initial consultation on the application involved notification letters being sent to 331 neighbouring properties on 2.10.2020 giving people 24 days to respond. A press notice was published in the Enfield Independent on 30.9.2020 and two site notices were also erected at the site on 29.9.2020. 20 objections were received.
- 7.5 As originally submitted, and the scheme which was the subject of this consultation, the application comprised two blocks of seven and five storeys and 91 residential units of residential accommodation as well as design differences when compared to the current proposal. The following objections (as summarised) were made in response to the application as originally submitted:
- Development too high
 - General Dislike of proposal
 - Inadequate parking provision
 - Increase in traffic
 - Increase of pollution
 - Loss of parking
 - Adverse heritage impacts
 - Affect local ecology
 - Inadequate public transport provision
 - Increase danger of flooding
 - Loss of light
 - Loss of privacy
 - More open space needed on development
 - Noise nuisance
 - Out of keeping with character of the area
 - Over development
 - Strain on existing community facilities
 - Loss of views
- 7.6 Objections were also received from local stakeholders as summarised below:

Enfield Town Residents Association

- The development is too high and too close to adjoining properties and will lead to loss of privacy for existing residents;
- There is inadequate parking provision for residents;
- Inadequate parking provision will lead to an increase in local traffic and additional parking along Old Park Avenue which will in turn increase congestion, hence creating worse air quality for residents on that road;
- This will additionally lead to significant loss of parking for existing residents on Old Park Avenue, hence loss of amenity;
- It is unclear whether there is sufficient hard standing to enable removals and/or deliveries to take place and, more importantly, to exit safely; and
- the design is inappropriate and out of keeping with the character of key conservation areas
- Furthermore, if as a result of these shortcomings the development proves difficult to sell as an 'upmarket' destination, then it may well end up being a destination for residents who have no other choice and complex support needs. This would subsequently put a strain on existing community facilities and – contrary to the developers' claim - fail to contribute to regeneration of the town.

Enfield Town Conservation Area Study Group

- Not entirely opposed to redevelopment of the site but they have some concerns about the proposal in its present form. They consider that it will cause harm to the significance of the Enfield Town Conservation Area, contrary to local and national policy and statute.
- The southern block is too close to the New River Path (long distance footpath) and will provide poor amenity for both walkers and residents of the new flats.
- The form of the upper floors to both blocks is harsh, with the upper storey(s) set too far forward and poorly detailed. The upper storey on northern block, and the upper two storeys on the southern block, should be set back further above the bays as well as between them on all facades. Greater setbacks would allow for larger terraces and more greenery on the upper floor, improving the appearance of the buildings, and helping the buildings to relate better to each other.
- The present large area of plain white masonry is overbearing, especially without an additional setback. The area above the upper floor windows should be better articulated and/or reduced in height. Areas seen from the west and south should also be better articulated. These buildings are seen in the round and should be treated as such. The detailing and massing on the southern block is particularly weak compared to the northern block.
- The west façade is bland
- The space between the building is inadequate
- Welcome this as a car free development, but to ensure that cumulative road impacts are kept to a minimum, parking restrictions should be strengthened nearby to ensure that residents do not simply try to park outside the CPZ or avoid its restrictions.

Detailed comments – Northern Block

- The upper floor should be set back above the bays as well as between them, and more greenery and terraces introduced on the upper floor.
- The upper part of the buildings is unattractive, harsh and undetailed when seen above the church hall from the CA and the Grade II listed war memorial. This area needs to be better articulated with setbacks and more detailing. This is an important view within the CA, and marks the entrance into it from the west.
- The relationship between the blocks is poor, with too stark a contrast between the heights in views from the east and west. This is largely an issue with the southern block, but consideration should also be given the form of the northern block in this respect
- Tree Screening should not be relied upon to mitigate impacts.

Detailed Comments – Southern Block

- Too large and less well articulated than the northern block. It will be overbearing and will have a harmful effect on the significance of the Conservation Area, contrary to local policy, the NPPF and s.72 of the 1990 Act.

- The east side of the southern block is much too close to the New River Path long-distance footpath and will not only harm the visual amenity of users of the footpath, but will also provide poor amenity for residents.
- The crude massing and detailing of the upper floor noted above in relation to the northern block is more apparent on the southern block as the block is larger. The upper storeys of the southern block should be stepped back on all sides and over more than one floor, including over the bays as well as between them, and more terraces and greenery introduced on the upper floors.
- More care should be taken of the relationship between the buildings around the entrance areas on both east and west.

St Paul's Community Centre

- Loss of natural light from the east windows to the Main Hall. The height of the proposed new building at 100 Church Street alongside St Paul's will increase from 3 storeys plus plant to 5 storeys plus plant. The proposed development is for 90 apartments and is roughly 4 times the size of the current building that was constructed in the 1980s.
- The car park that is within the ownership of St Paul's Centre is key to the ongoing operation of the community centre, and whilst there is an agreed right of access across our land to the 100 Church Street site, we have major concerns about the detrimental effect that such a large building development will have on the Centre's day to day use of the car park and centre and particularly the effect on the Centre's clients, many of whom rely upon the services that the Centre provides. This all begs questions as to the adequacy of access of the right-of-way across the Centre's car park, the need for detailed traffic management into and out of the site, should planning approval be given (we currently use an ANPR system to manage the use of the Car Park) and even whether or not the car park can be used at all by the Centre's visitors and tenants during construction.
- Concerns about how the centre will be impacted during the period of construction having regard to piling, heavy duty vehicles, machinery, deliveries etc.

7.7 In April 2021, revisions to the proposal were submitted to address concerns raised by Officers and in response to the objections received from neighbouring residents and other local stakeholders. In summary the following amendments were made:

- Reduction in total number of units to 78 units (previously 91 units).
- Southern block reduced by 1 storey to 6 storeys (previously 7 storeys).
- Western gable end condition of the southern block has been partially stepped back by circa 4m, to reduce the impacts on adjacent houses at 2 to 6 Old Park Avenue.
- Revisions to elevations to add quality and reduce overall height and scale, including lowered roof parapet, softening of top storey brickwork and introduction of detail above ground floor windows.
- An increase in the overall family housing provision within the proposed development. This includes the introduction of 4 x 3 bedroom homes within the London Affordable Rent component.
- The housing mix and affordable housing provision has been amended. The proposed development will now provide 16.75% affordable housing provision (by habitable room), which will all be provided all as London Affordable Rent.

- Ground floor areas of southern block have been adjusted, including moving the substation out into a separate building, to provide more cycle storage to southern block.

7.8 A 14 day neighbour re-consultation on these amendments took place commencing on 27.4.21. As previously, 331 neighbouring properties were notified by letter. 4 responses were received objecting to the revised proposal, 1 response was received neither objecting to or supporting the application and 1 response in support of the application was received. In summary the following comments were made:

Objections

- Close to adjoining properties
- Overdevelopment
- Development too high
- Inadequate car parking
- Out of keeping with the character of the area
- Adverse impact on views from Town Park
- Still too dense
- Adverse impact on heritage assets.

Neutral

- Aspects of the revised proposal welcomed; the reduction in the height of the southern block, introduction of a margin of distance between the southern block and the properties in Old Park Ridings, improved design of the west elevation and improvements to the detailed design of the elevations.
- Concerns remain in relation to the closeness of the Southern Block to the New River boundary and how this may result in unsightly shutters/ barriers to privatise this environment

Support

- It is good that they listened and made the effort to provide a better mix etc

Enfield Town Conservation Area Group

- The revised proposals are an improvement over the previous proposals, but the scheme is still too close to the river. The southern bay window is almost on top of the red line and the terrace of the flat just to its north actually encroaches over the red line into the public footpath. It is impossible to see how it will be possible to make these flats feel pleasant and safe, and not overlooked by passers by on the footpath without encroaching further onto the footpath or building a high fence or putting in large planting. It is also hard to see how tenants themselves will not simply take over public land for their own uses outside their flats.

7.9 Further amendments were made to the proposal in July 2021 following feedback from Officers. In summary the following amendments have been made:

- the western gable end has been fully set back across the entire elevation and the overall width of this element has been reduced in order to reduce impacts on numbers 2 to 6 Old Park Avenue.

- Due to this amendment to the built form, the internal configuration of the southern building has been altered which has in turn resulted in amendments to the proposed housing mix and affordable housing proportion.
- The proposed development will now provide 14.22% affordable housing provision, which will all be provided all as London Affordable Rent.

7.10 A final round of public consultation was carried out in response to these amendments. 331 neighbouring properties were notified on 12.8.2021 and they were given 14 days to respond. 2 objections were received. The following objections were made in summary:

- Close to adjoining properties
- Inadequate access
- Inadequate parking provision
- Over development
- Adverse impact on character of the area
- Too dense
- Still adverse impact on 2-6 Old park Avenue
- Issue of parking not addressed
- May make it difficult for hail and ride buses to stop safely

Statutory and non-statutory consultees

Environmental Health :

7.11 Environmental Health does not object to the application for planning permission as there is unlikely to be a negative environmental impact. Conditions in relation to provision of an acoustic report, air quality, contamination and non-road mobile machinery have been recommended.

SuDS :

7.12 No objection is raised subject to conditions relating to source control SuDS measures for the northern building, confirmation of the extent of the green roofs on the southern building and confirmation of the final sewer connections and RWP locations.

Traffic and Transportation:

7.13 No objections raised to the proposal and the car free nature of the proposed development.

7.14 A condition is recommended to ensure that the proposed door to the cycle parking meets with the Council's standard of having a 1.2m minimum opening width. There is an outstanding concern about the cycle parking provision and that the majority is provided in the basement of one building which would not be convenient for many users and would act as a barrier to cycling. It has been agreed this can be mitigated by a contribution towards some offsite public cycle parking provision. The amount to be agreed and secured through S106. It is also noted that the development would be unable to accommodate the additional 7% of disabled parking spaces, that should be available on site if required for disabled use in the future. While a further two disabled spaces would ideally be required on site in addition to the 3 proposed, it has been agreed that an acceptable compromise would be for the applicant to explore funding/ measures that could be introduced to improve public access for the disabled in the local area if there were additional demand in excess of the 3% DPBs

on site in the future. Discussions are ongoing with the applicant team and the agreed solution will be secured through S106.

Tree Officer:

- 7.15 No objections subject to condition regarding tree protection

Energetik:

- 7.16 Discussions will be held 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). This will form part of the S106 legal agreement

Designing Out Crime Officer:

- 7.17 No objections subject to condition

NHS North Central London Clinical Commissioning Group:

- 7.18 The development will have an impact on local healthcare services, particularly primary healthcare services and facilities. The submitted Health Impact Assessment (August 2020) correctly identifies the nearest GP practices and concludes that they have sufficient workforce capacity to accommodate the additional demand from the development. Whilst this is correct using a GP per patient ratio and benchmark figure, the ratio should be treated with caution as GP practices are moving towards a more flexible, multi-disciplinary workforce providing a wider range of services across a network of practices. In this case the nearest GP practice, the Town Surgery, is part of the West Enfield Collaborative Primary Care Network. There may be premises capacity and condition issues that need to be addressed but have not been identified in the applicant's assessment.
- 7.19 In this instance, there is no available evidence of a site-specific impact to justify a s106 contribution. However, the cumulative impact of development in the area may require future investment to increase capacity and it is noted that the development will be liable for a CIL payment to support local infrastructure.

Thames Water:

- 7.20 No objection subject to conditions.

Design Review Panel

- 7.21 The planning application has been considered by the Design Review Panel twice during its evolution.
- 7.22 At the first meeting on 28th November 2019, the Panel acknowledged the development potential of this sustainable but sensitive location for townscape and heritage reasons but considered the scheme maximised rather than optimised development with height up to 8 storeys considered too great. Breaking the building into two was welcomed but the Panel felt the scheme needed further work on the design and form with greater emphasis on horizontal rather than vertical detailing and the landscape strategy given the relationship to the New River. However there was support for care free development in this location and the number of dual aspect residential units was welcomed.

- 7.23 At the second meeting on 26th February 2020 the Design Review Panel reiterated the concern about the 8 storey height and the reversion to a single block. It felt the form needed to be broken up to assist in creating a background building to enhance the setting an appearance of nearby churches and the conservation area. Further design work on the mansion house typology was also requested to support whether this is an appropriate contextual addition to the conservation area. Improvements in sustainability and the move towards a net zero carbon building would also be welcome. Improved work on the landscape strategy and the materiality of the brick gave the Panel confidence this could be a successful brick building.
- 7.24 Following this meeting while the viability of the schemes has continued to be a consideration to optimise the delivery of housing including affordable housing, the development has been revised on through a number of iterations and the current schemes has sought to respond to the Panel comments by:
- breaking the single block into two distinct blocks
 - reducing the height of the building to 5 and 6 storeys
 - reducing the height of the front block to make it subservient to the adjacent Church
 - recessing the upper floors to reduce the perceived mass.
 - refining the mansion house typology but improving the detailing to provide a more horizontal than vertical approach
 - increasing the separation to neighbouring residential properties
 - improve detailing / materials

8. Relevant Policy

National Planning Policy Framework 2021

- 8.1 The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:
- “(c) approving development proposals that accord with an up-to date development plan without delay; or
- (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:
- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (7); or
- (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.2 Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”
- 8.3 The Council’s recent housing delivery has been below our increasing housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and more recently being placed in the “presumption in favour of

sustainable development category” by the Government through its Housing Delivery Test.

- 8.4 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.5 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.6 In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 Enfield met 77% of the 2,394 homes target for the three-year period delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target and we now fall into the “presumption in favour of sustainable development” category.
- 8.7 This is referred to as the “tilted balance” and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

The London Plan 2021

- 8.8 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:
 - GG1 – Building Strong and Inclusive Communities
 - GG2 – Making the Best Use of Land
 - GG3 – Creating a Healthy City
 - GG4 – Delivering the Homes Londoners Need
 - D3 – Optimising Site Capacity through the Design-Led Approach
 - D4 – Delivering Good Design
 - D5 – Inclusive Design
 - D6 – Housing Quality and Standards
 - D7 – Accessible Housing
 - D8 – Public Realm

- D11 – Safety, Security and Resilience to Emergency
- D12 – Fire Safety
- D14 – Noise
- H4 – Delivering Affordable Housing
- H5 – Threshold Approach to Applications
- H6 – Affordable Housing Tenure
- H10 – Housing Size Mix
- HC1 – Heritage Conservation and Growth
- S4 – Play and Informal Recreation
- E6 – Locally Significant Industrial Sites
- HC1 – Heritage Conservation and Growth
- G1 – Green Infrastructure
- G5 – Urban Greening
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions
- SI4 – Managing Heat Risk
- SI5 – Water 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
- T6.1 – Residential Parking
- T7 – Deliveries, Servicing and Construction
- T9 – Funding Transport Infrastructure through Planning

Local Plan - Overview

- 8.9 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 and the London Plan, 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.

Core Strategy

- 8.10 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.

- CP2: Housing supply and locations for new homes
- CP3: Affordable housing
- CP4: Housing quality

CP5:	Housing types
CP9:	Supporting community cohesion
CP13:	Promoting economic prosperity
CP16:	Taking part in economic success and improving skills
CP18:	Delivering shopping provision across Enfield
CP20:	Sustainable energy use and energy infrastructure
CP21:	Delivering sustainable water supply, drainage and sewerage infrastructure
CP22:	Delivering sustainable waste management
CP24:	The road network
CP25:	Pedestrians and cyclists
CP26:	Public transport
CP28:	Managing flood risk through development
CP30:	Maintaining and improving the quality of the built and open environment
CP31:	Built and landscape heritage
CP32:	Pollution
CP36:	Biodiversity
CP46:	Infrastructure contributions

Development Management Document

8.11 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.

8.12 The following local plan Development Management Document policies are considered particularly relevant:

DMD1	Affordable Housing on Sites Capable of Providing 10 Units or more
DMD3	Providing a Mix of Different Sized Homes
DMD4	Loss of Existing Residential Units
DMD6	Residential Character
DMD8	General Standards for New Residential Development
DMD9	Amenity Space
DMD10	Distancing
DMD22	Loss of Employment Outside of Designated Areas
DMD37	Achieving High Quality Design-Led Development
DMD38	Design Process
DMD44	Preserving and Enhancing Heritage Assets
DMD45	Parking Standards
DMD47	New Roads, Access and Servicing
DMD48	Transport Assessments
DMD49	Sustainable Design and Construction Statements
DMD50	Environmental Assessment Methods
DMD51	Energy Efficiency Standards
DMD53	Low and Zero Carbon Technology
DMD54	Allowable Solutions
DMD55	Use of Roof Space / Vertical Surfaces
DMD56	Heating and Cooling
DMD57	Responsible Sourcing of Materials
DMD58	Water Efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water

DMD65	Air Quality
DMD68	Noise
DMD69	Light Pollution
DMD70	Water Quality
DMD72	Open Space Provision
DMD73	Children's Play Space
DMD78	Nature Conservation
DMD79	Ecological Enhancements
DMD81	Landscaping

8.13 Other Material Considerations

National Planning Practice Guidance
 Mayoral Supplementary Planning Guidance
 LBE S106 SPD
 Enfield Strategic Housing Market Assessment
 Community Infrastructure Levy Regulations
 Enfield Town Conservation Area Character Appraisal (2015)

Enfield Town Framework Masterplan (2018)

8.14 Site 17 – Former Metaswitch Premises

Key principles and land uses

- Should this prominent site come forward, it is appropriate for a mix of use including residential, offices and potentially commercial leisure.
- Land to the south and fronting Old Park Avenue is most appropriate for residential uses.
- Redevelopment of the site should not result in any loss of jobs in Enfield.

Form of development

- The Metaswitch site falls within the Enfield Town Conservation Area although the building itself makes only a neutral contribution to the character of the conservation area.
- The existing Metaswitch office building does, however, contribute positively to an office campus character.
- New development fronting Church Street should respect the scale of and views to key landmark churches either side of the site. Views to these churches play an important role in establishing the character of the conservation area.
- The scale of development on the Old Park Avenue frontage should respect existing dwellings but there will be an opportunity for a taller form of development in the south east corner of the site.
- Buildings should address the river front in a positive manner.

Access and movement

- The site's principal vehicular access will continue to be taken from Old Park Avenue.
- Improvements arising from the development of this site to the riverside path through Town Park would be welcome.

Public realm

- The existing trees are a major environmental asset and should be retained in any redevelopment. A TPO is protecting a Sycamore tree on Old Park Avenue.

- Access to the New River path should be maintained and where possible improved

Enfield Local Plan (Reg 18) 2021

- 8.15 Enfield Local Plan - Reg 18 Preferred Approach was approved for consultation on 9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. It is Enfield's Emerging Local Plan.
- 8.16 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan, while noting that account needs to be taken of emerging policies and draft site proposals.
- 8.17 Key local emerging policies from the plan are listed below:
- | | |
|------------------------|--|
| Policy DM SE2 | – Sustainable design and construction |
| Policy DM SE4 | – Reducing energy demand |
| Policy DM SE5 | – Greenhouse gas emissions and low carbon energy supply |
| Policy DM SE7 | – Climate change adaptation and managing heat risk |
| Policy DM SE8 | – Managing flood risk |
| Policy DM SE10 | – Sustainable drainage systems |
| Strategic Policy SPBG3 | – Biodiversity net gain, rewilding and offsetting |
| Policy DM BG8 | – Urban greening and biophilic principles |
| Policy DM DE1 | – Delivering a well-designed, high-quality and resilient environment |
| Policy DM DE2 | – Design process and design review panel |
| Policy DM DE7 | – Creating liveable, inclusive and quality public realm |
| Policy DM DE10: | - Conserving and enhancing heritage assets |
| Policy DM DE11 | – Landscape design |
| Policy DM DE13 | – Housing standards and design |
| Policy DM H2 | – Affordable housing |
| Policy DM H3 | – Housing mix and type |
| Policy DM T2 | – Making active travel the natural choice |
| Strategic Policy SP D1 | – Securing contributions to mitigate the impact of development |

9. Analysis

- 9.1 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.
- 9.2 The main planning issues to consider are as follows:
- Principle of Development
 - Housing Provision and Mix
 - Heritage and Design Considerations
 - Residential Quality and Amenity
 - Neighbouring Amenity
 - Transport, Access and Parking
 - Landscape, Play, Biodiversity and Trees
 - Sustainability and Climate Change

- Flood Risk and Drainage
- Socio-economics and Health
- S106
- Community Infrastructure Levy

Principle of Development

- 9.3 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. Furthermore, paragraph 11 (c) of the National Planning Policy Framework (NPPF) goes on to state that development proposals that accord with the development plan should be approved without delay.
- 9.4 The Development Plan includes local policies (Core Strategy / Development Management Plan) as well as the London Plan (2021) and national guidance. The London Plan policies will have greater weight where there is inconsistent with local policy given its more recent adoption in March 2021.
- 9.5 Running alongside this is the aim that planning should facilitate sustainable development and this is at the heart of the NPPF which advocates a presumption in favour of sustainable development. The NPPF at paragraph 120 also advocates the promotion and support for 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.
- 9.6 Such an approach to maximise the efficient use of land, is consistent with the adopted London Plan which states at Para 1.2.2 of the London Plan
- “The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.”*
- 9.7 Para 1.1.4 of the London Plan also states:
- “Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspaces in accessible locations, built forms that work with local heritage and identity, and social, physical and environmental infrastructure that meets London’s diverse needs is essential if London is to maintain and develop strong and inclusive communities”.*
- 9.8 These strategic planning ambitions are captured in Policies GG1 (Building Strong & Inclusive Communities), GG2 (Making the best use of Land) , GG3 (Creating a Healthy City) and GG4 (Delivering the Homes Londoners Need) with the proposal needing to be viewed in this policy context.
- 9.9 Making the more efficient use of land is presently of significance due to the identified need for housing as a consequence of the Housing Delivery Test which has triggered the “tilted balance” and the presumption in favour (NPPF). For decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan.

- 9.10 Enfield Housing's Trajectory Report 2019 shows that during the preceding 7 years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more high-quality homes is a clear priority, with only 51% of approvals over the preceding 3-years actually being implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 9.11. The Council's Local Plan Issues & Options (Regulation 18) document (2021) acknowledges the sheer scale of the growth challenge for the Council and the focus for development in locations with good access to local infrastructure and public transport. The Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the Borough.
- 9.12. Enfield is a celebrated green borough with close to 40% of the land currently designated as 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. These land designations underpin the need to optimise development on brownfield land. Paragraph 1.2.5 of the London Plan notes that
- 'all 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'.*
- 9.13 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.
- 9.14 The application site constitutes brownfield land with a very good public transport accessibility level (PTAL) of 6a and therefore the principle of developing the site for housing to support the Borough's challenging housing delivery target is strongly supported in principle.

Redevelopment

- 9.15 The scheme proposes the redevelopment of the site, which currently comprises a vacant office building and car parking spaces. The existing building makes a neutral contribution to the character of the Enfield Town Conservation Area as identified in the Enfield Town Conservation Area Character Appraisal. There is therefore, no objection to its replacement.
- 9.16 The site is identified within the Enfield Town Framework Masterplan (2018) where it is recognised that the site is suitable for redevelopment. It states that the Metaswitch Site, subject to appropriate relocation of the office use elsewhere within the centre, presents an opportunity for high-density mixed-use development, taking advantage of proximity to Enfield Chase station.

Residential Use

- 9.17 It is noted that the current proposal is for a purely residential scheme (as opposed to mixed use as stated in the 2018 Framework Masterplan). Lengthy discussions were held with the applicant team about providing a commercial use at ground floor along the Church Street frontage in order to activate this section of the street. However, it was agreed that the priority is to provide additional homes and adding a commercial

element would further reduce the capacity of the site for residential development. Not only in terms of loss of floorspace for residential purposes but also in terms of additional servicing requirements. Given the site is located at the edge of the town centre, and subject to achieving an appropriate relationship with the street, a wholly residential scheme is considered appropriate in this instance.

Loss of Offices

- 9.18 Policy DMD 22 states that proposals that would result in the loss or reduction of office floorspace within Enfield Town will be resisted unless it can be demonstrated that the site is no longer suitable for office use.
- 9.19 In this instance the site was most recently occupied by Metaswitch. They have relocated to new larger offices granted planning permission under 18/03009/FUL on the Genotin Road car park site. This is also located within Enfield Town and is considered to compensate for the loss of office space at 100 Church Street.

Summary of Principle

- 9.20 Given the above considerations, the principle of development is considered to be acceptable in principle terms subject to other detailed considerations as discussed below.

Housing Need, Delivery and Mix

- 9.21 The current London Plan sets a target for the provision of 52,287 new homes each year. In addition, the London Plan 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. 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.
- 9.22 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.
- 9.23 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.
- 9.24 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.

- 9.25 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy GG1, GG2, GG3 & GG4 of the London Plan seeks to promote the provision of quality new homes and for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 9.26 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 evolve.
- 9.27 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. The former Metaswitch premises is such a site.

Housing and Tenure Mix

- 9.28 Core Policy 5 of the Core Strategy, supported by Policy DMD3, seeks to achieve a Boroughwide target over the whole plan period as outlined below:
- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses (5-6 persons), 20% 4 bed houses (6+ persons)
 - Social Rented Housing – 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons), 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons)
- 9.29 Core Policy 5 also outlines that the Council will seek a range of housing types in the intermediate sector, and that the mix of intermediate housing sizes will be determined on a site by site basis.
- 9.30 It should also be noted that the evidence base to support Core Policy 5 dates from 2008. The emerging draft Local Plan for Enfield uses a more up to date evidence base; the Local Housing Needs Assessment 2020. This has informed emerging Policy H3. The table below is an extract from Policy H3, which outlines priority types for different sized units across different tenure:

	Studio/bedsit	One-bedroom	Two-bedrooms	Three-bedrooms	Four-bedrooms or more
Social/affordable rented	Low priority	Medium priority	High priority	High priority	Low priority
Intermediate	Low priority	High priority	High priority	Medium priority	Low priority
Market	Low priority	Low priority	Medium priority	High priority	High priority

- 9.31 The Council's Local Housing Needs Assessment (LNHA) 2020, regarding affordable housing need, outlines that 41.1 per cent of new affordable homes should have three bedrooms. This is based on type and size requirements of affordable housings based on housing register evidence. It also outlines, as is reiterated within text supporting

emerging Policy H3, that the focus of affordable ownership provision (shared equity/intermediate products) should be on one and two-bedroom units, as the majority of households who live in intermediate (shared ownership) housing are households without children.

- 9.32 The Council's LHNA (2020) also outlines that 14.7% of those currently on the Council's waiting list need one-bed homes, 35.3% need two-bed homes, 42.3% need three-bed homes and 7.7% need four-bed homes.
- 9.33 It must also be recognised that the more recently adopted London Plan policy H6 (Affordable Housing Tenure) seeks a minimum of 30% low cost homes (either London Affordable Rent (LAR) or Social Rent), a minimum of 30% intermediate products, with the remaining 40% to be determined by the Borough based on identified need.
- 9.34 Core Policy 3 of the Core Strategy outlines that the Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision.
- 9.35 The proposed housing mix is set out below:

Units	Number	% of total
3b4p	4	5.12%
2b4p	29	37.18%
2b3p	12	15.38%
1b2p	33	42.31 %
Total	78	

- 9.36 It is recognised that, having regard to the policy context discussed above, there is a predominance of 1b2p and 2b4p flats proposed, notwithstanding there is significant need for properties with 3 bedrooms. However, weight in favour of the proposed mix is attributed because of the town centre location and on balance is considered acceptable.
- 9.37 Broken down by tenure, the development will provide:

Private

Units	Number	% of total private
3b4p	0	0
2b4p	25	36.23
2b3p	11	15.9
1b2p	33	47.82

London Affordable Rent

Units	Number	% of total affordable
3b4p	4	44.44
2b4p	4	33.33
2b3p	1	11.11
2b3p	0	0
1b2p	0	0

9.38 A total of 16.7% affordable homes (by habitable room) are proposed. This represents an increase of 2 residential units over that previously considered by Members and involves the additional provision of 1x2B3P and 1x2B4P units. This increases the number of affordable homes within the development to 9 units. All these 9 homes will be at the London Affordable Rent level, where rents are capped to levels prescribed by the Mayor of London. One of the two additional homes will also be of a size capable of accommodating a small family (2b4p) meaning that 8 out of the 9 LAR homes being appropriate for families

9.39 This level of provision while below policy targets has been subject to robust testing by an independent viability assessor retained by the Council. This viability review concludes that the level of provision is the maximum that can be reasonably sustained by the development. In such circumstances, the proposed development complies with the requirements of policy which acknowledges that not all schemes can sustain 35% affordable housing where this is demonstrated by viability review. This must carry significant weight in the planning balance and assessment of acceptability.

9.40 In arriving at this conclusion, the Council's independent viability consultants challenged a number of assumptions and inputs into the financial appraisal of the scheme. They also held discussions with the Applicant team testing differences in appraisal. Only following these discussions did the Council's independent viability consultants conclude, based on their assumptions (and not those of the applicant where differences were identified), that the scheme could not support more than 16.7% affordable housing on the basis of the tenure proposed. It should also be noted that the Applicant has stated “

“As we have previously set out, our viability assessments have demonstrated an overall deficit against the Benchmark Land Value and therefore the scheme is unable to support additional affordable housing above the London Affordable Rent units that are proposed. This position has been scrutinised by a 3rd party independent assessor and they have agreed with this position. Notwithstanding that, the Applicant would be willing to agree to a review mechanism which will be secured in the S106. This would allow the affordable housing to be increased if the viability of the scheme improves over time”.

9.41 It must be recognised that a significant factor in this level of provision, is the constraints placed on the acceptable development of this site primarily the need to reduce the size, bulk and quantum of development leading to a reduction in the number of residential units. In summary (and discussed in future sections of this report), the height of the development has been reduced due to the sensitive location of the site within Enfield Town Conservation Area and the scale of the building has also been reduced to minimise the impact on neighbouring residential occupiers. These necessary changes have had implications for viability and has led to a reciprocal reduction in the amount of affordable housing that can viably be provided on the site. Officers have accepted this compromise in order to ensure that the

integrity of the Conservation Area is not unacceptably impacted and any unacceptable impacts on neighbouring residential occupiers are minimised.

- 9.42 It is acknowledged that while the overall amount of affordable housing is constrained, the provision would all be London Affordable Rent (LAR) and would be focused on the larger units of accommodation (all the 3b4p are designated as LAR). This would contribute towards meeting local need where it is needed the most.

Housing and Tenure Mix Conclusions

- 9.43 As set out, Core Policy 5 should not be applied or relied on in isolation, being a Borough wide target over the plan period especially when there is more recent adopted policy in the form of the London Plan and there is a need to respond to the conclusions of the Housing Delivery test which results in the application of the tilted balance to the assessment of residential schemes and the presumptions in favour of approving such schemes which is considerable in the absence of matters which would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Whilst emerging policy holds limited weight, it is nevertheless based on the most up to date evidence base and represents the most recent local needs assessment regards housing mix and tenure.
- 9.44 Taking all matters into consideration, it is considered the scheme delivers the maximum reasonable amount of affordable housing, having given due consideration to the specific nature of the site and the independent viability review. The unit/tenure mixes will be secured through a s106 Agreement should planning permission be granted. A review mechanism (to be agreed with the Applicant in line with the Mayors Affordable Housing and Viability SPG 2017) will be incorporated to secure rights to any uplifts in value/future amendments, which may lead to a more profitable development being built at the site and to ensure the scheme maximises affordable housing delivery.

Heritage and Design

- 9.45 The development is located within the Enfield Town Conservation Area and this is the primary consideration. The nearest listed building is the Grade II War Memorial on The Green. There are also a number of non designated heritage assets in the vicinity including the Town Park .

Relevant Policy and Legislation

- 9.46 In respect of the conservation area, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 requires that LPAs pay special attention in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area. If harm is identified, it should be given considerable importance and weight in any planning balance in accordance with guidance in the National Planning Policy Framework.
- 9.47 In respect of listed building (i.e. the War Memorial), Section 66 of the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 states “In considering whether to grant planning permission for development which affects a Listed Building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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.

- 9.48 The 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.
- 9.49 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.
- 9.50 Chapter 16 of the NPPF states that 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. London Plan Policy 7.8 '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.
- 9.51 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.
- 9.52 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.
- 9.53 Paragraphs 190 of the NPPF provides that in determining planning applications, local planning authorities should take account of:
- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b. the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c. the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d. opportunities to draw on the contribution made by the historic environment to the character of a place.
- 9.54 Paragraph 200 states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. Substantial harm to or loss

of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'.

- 9.55 Paragraph 201 of the NPPF deals with substantial harm to or total loss of significance of a designated heritage asset. Paragraph 202 of the NPPF provides that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Paragraph 203 of the NPPF deals with non-designated heritage assets stating that the 'effect of an application on the significance of a non-designated heritage asset should be taken into account 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 or loss and the significance of the heritage asset'.
- 9.56 London Plan Policy HC1 'Heritage conservation and growth' states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. 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 while 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.

Heritage Context

- 9.57 100 Church Street comprises a late 20th century office building which is sited in Enfield Town Conservation Area (designated heritage asset). The building is noted as making a neutral contribution to the character and appearance of the area. The site is predominantly one of two contrasting faces fronting both a historic waterway corridor that is semi-rural in character and the urban streetscape of Church Street which marks the beginning of the commercial centre of Enfield. The site is surrounded by landmark buildings, including St Paul's Church, The Magistrates Court, Trinity Methodist & United Reformed Church, and New River House, Nos. 88-90, Church Street (locally listed). The site also lies within the setting of the Grade II listed War Memorial. A drill hall designed in a free Tudor-style circa 1901 (locally listed) is located directly opposite the site on Old Park Ridings, whilst the Town Park (locally listed) and bowling green bound the southern edge of the site.
- 9.58 The New River is in itself an important heritage asset (circa 1613) and one that Members have identified as a key to the overall acceptability of the development. It forms an important publicly accessible spine route of changing character through the Conservation Area that is connected to the wider area through a 28-mile long footpath which follows the course of the New River from its source in Hertfordshire to its original end in Islington, London. Key views are also afforded from Library Green (locally listed), across the Park from Gentleman's Row, along the New River from Church Street and from the site itself looking towards the Methodist Church. Longer

views are afforded from within the Town Park (locally listed) and from Chase Green Gardens (locally listed).

9.59 The current proposal has been subject to extensive discussion, involving the Council's Conservation and Urban Design teams. Amendments have been made to the proposal in order to address identified concerns whilst still recognising the need to optimise the development potential of the site and to create an economically viable scheme that is able to be implemented and deliver new homes. This requires finely balanced judgements and compromises have had to be made to ensure the optimal solution for the site.

9.60 The design of the proposal has evolved during this process in the following ways since the submission of the planning application (it is noted that other amendments were made prior to submission most notably the separation of the development into two blocks to reduce the overall scale and massing):

- Southern block reduced by 1 storey to 6 storeys (previously 7 storeys). Front block remains at 5 storeys as submitted.
- Western gable end condition of the southern block has been fully stepped back by circa 4m, to reduce the impacts on adjacent houses at 2 to 6 Old Park Avenue.
- Revisions to elevations to add quality and reduce overall height and scale, including lowered roof parapet, softening of top storey brickwork and introduction of detail above ground floor windows.
- Ground floor areas of southern block have been adjusted, including moving the substation out into a separate building, to provide more cycle storage to southern block.

9.61 Notwithstanding these amendments, the proposal still raises heritage and design issues. Most notably:

- Spacing: While the separation of the building is welcomed, it is considered in heritage terms that the distance between the blocks is not sufficient and results in a limited viewing corridor through the site. The concern is that the separation mitigates the overall scale and mass of the development and if is insufficient, the perceived scale and mass would remain. This would be particularly notable from the New River footpath to the east and Church Street when approaching from the south-east.
- Layout: The rear block and its proximity to the New River path is still identified as an area of concern. The projecting bay element would be sited close to the site boundary and would result in a closing of the views southwards along the New River. The option is that this would cause significant harm to the character and appearance of this part of the Conservation Area, irrevocably altering how the New River is experienced and interpreted. Harm would also be caused to New River House to the east.
- Height: The reduction in height of the rear block is welcomed albeit there remains concerns over the height of the blocks in terms of their relationship to the setting of the Conservation Area. From a heritage perspective, it is considered that the development would still be dominant in views from the New River path, thereby resulting in harm to the Conservation Area. In certain views, aspects of the proposal are visible at ridge level (in relation to St Paul's Church) and it is considered that this dilutes the pre-eminence of St Paul's church in the streetscape. Furthermore, the scheme does not respond to the

modest domestic scale of the Conservation Area in this locality or the historic hierarchy of the built environment conveyed through the scale, massing and height of buildings.

- Rooftop: Concern remains about the proposed plant/ lift overruns and other development on the roof. They add to the roofline and are prominent from certain perspectives from within the Conservation Area
- Landscaping: Landscaping remains unresolved and insufficient consideration had been given to the transition between public and private as well as between the contrasting characters of the New River and Church Street

Assessment of Harm

- 9.62 Having regard to the above, and specialist advice provided by the Council's Conservation and Urban Design teams, it is acknowledge there remain matters of design that cause concern and as such, cause harm to the special character and setting of the Enfield Town Conservation Area as a designated heritage asset as well as to the setting of the non designated heritage assets of New River House (LHL No.58); St Pauls Church; the New River; and, Chase Green (LHL No.41).
- 9.63 In particular, concerns exist with regard to the relationship of the proposed development to the setting of the New River
- 9.64 A key aspiration of the Applicant and Maccleanor Lavington's overall design approach has been to make the river a prominent feature of the proposed development and to positively respond to and enhance the river setting.
- 9.65 Between the proposed new buildings that front on to the river, the distances between the edge of the path itself and gardens are 3m at the southeast corner (narrowest point) and generally 7m to the northern block. On balance, while the harm to the setting of the non designated asset of the New River is acknowledged, on balance, it is considered the resultant spatial separation is acceptable. To achieve a greater separation would involve a reduction in the quantum of development and the corresponding decrease in the number of affordable homes that can be sustained by the development. In addition, if the proposed 3m garden depths (of the homes that front the river), the spatial relationship is further improved
- 9.66 It is accepted that the proposed buildings are close to the site boundary in a very limited area when considering the entire length of the site, and importantly, when compared to the existing building (which is one continuous mass and provides no through access) and the area covered by the hardstanding of the existing car park. Considerable effort has been made to set the majority of the new buildings back from the river, whilst still optimising the delivery of new homes on an allocated development site.



- 9.67 A further element in this relationship to the non designated heritage asset is the proposed landscape strategy. This seeks to deliver a high quality environment across the site and in particular make a positive contribution to the riverfront. The landscape proposals seek to provide enhancements to biodiversity and access to the New River corridor along the boundary of the site. Mown grass, which is “species-poor”, is proposed to be replaced with a transition of habitats including native species rich meadow, together with biodiverse and structural planting for shade. Additionally, the ground floor private amenity spaces have been designed to maximise opportunities for planting that can provide privacy, with woodland style planting and multi-stem shrubs, in addition to the evergreen hedgerow and railings proposed.
- 9.68 The boundary treatment to the New River frontage would comprise a low hedge to sit in front of a nominal 750mm high metal fence. These will demarcate the gardens (private amenity) behind.
- 9.69 It is acknowledged that the scheme relies on the external walls/ doors for creating the secure lines, but this is intentional. A key part of the design strategy is based on providing equitable, quality external spaces, especially facing the river. This is achieved by striking a balance between integrating carefully with the surrounding context rather than creating fenced, isolated communities - which is wholly accordance with policy at all levels.



- 9.70 Mindful of the above but specifically taking account of the tests set out in the National Planning Policy Framework (2021), it is considered by the Heritage officer that the level of harm to the Enfield Town Conservation Area as a designated heritage asset and the non designated heritage assets is considered to be 'less than substantial'. As such the local planning authority must weigh this harm against any public benefits of the proposal including, where appropriate, securing its optimum viable use (paragraph 202 of the NPPF). This is particularly important in terms of the current situation brought about by the Housing Delivery Test and the tilted balance in favour of approving sustainable residential development unless the matters of concern would significantly and demonstrably outweigh the benefits: in this case the delivery of 78 units of residential accommodation.
- 9.71 In identifying harm to the Enfield Town Conservation Area., Members also identified that the following asset would be particularly affected making their assessment of the harm to heritage assets, the Committee identified that the following assets would be specifically affected:
- i) Drill Hall, Old Park Ridings (Locally Listed / Non Designated Heritage Asset)
 - ii) War Memorial (Grade II Listed Building)
 - iii) Gentleman's Row
- 9.72 The Heritage Officer has reviewed his assessment of the development relative to specific heritage assets and has concluded given that the overall assessment of the harm arising from the development, was less than substantial, that there is insufficient harm to the Drill Hall, the setting of the War Memorial and Gentleman's Row to substantiate inclusion in a reason for refusal.
- 9.73 Policy HC1 of the London Plan states that "Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process". In addition, Policy DMD 44 states that Application for

development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused.

- 9.74 In addition, Objective 10 of the adopted Heritage strategy states “Continue to manage the Borough’s heritage and its setting as appropriate to its significance through regulatory and planning functions and develop the instrumental value of heritage in place-making
- 9.75 It is clear there is harm albeit less than substantial harm, to the Enfield Town Conservation Area and setting of the non designated heritage asset of the New River.
- 9.76 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. Paragraph 202 of the NPPF provides that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, which must be given considerable importance and weight, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Paragraph 203 of the NPPF deals with non-designated heritage assets stating that the ‘effect of an application on the significance of a non-designated heritage asset should be taken into account 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 or loss and the significance of the heritage asset’.
- 9.77 It is noted that whilst the overall scale of harm to the Conservation Area may be ‘less than substantial’ great weight should be given to the heritage asset’s conservation (NPPF Para.199) and clear and convincing justification provided for any level of harm (NPPF Para.200).The Local Planning Authority must also consider the impact upon the significance of the affected non-designated heritage assets as identified above. However, the local planning authority is able to take a balanced judgement, having regard to the scale of harm identified and the significance of the heritage assets affected (NPPF Para.203).
- 9.78 The less than substantial harm therefore is able to be balanced against the public benefits of the proposal, namely the 78 units of residential accommodation. With the tilted balance in effect, this carries significant weight in favour of the proposal.
- 9.79 Having regard to the ‘less than substantial’ harm identified, it is acknowledged that improvements have been made to the proposal during extensive pre-application discussions and during the assessment of the current planning application. This includes the reduction in the number of units from 91 to 78 which has enabled the heritage conclusions to be that the development would result in less than substantial harm. The outstanding heritage and design considerations therefore need to be balanced against the public benefits. These include
 - i) the need to optimise the use of an existing brownfield site in an area of very good public transport accessibility
 - ii). this is a sustainable location for a more intensive form of development delivering housing which would contribute towards the Borough’s challenging housing delivery targets.
- 9.80 In this context, on balance, and giving significant weight to the presumption in favour of approving sustainable development (Para 11 of the NPPF) it is considered that the high-quality architecturally designed development, as revised, is acceptable.

- 9.81 In order to ensure a high standard of development and detailed design quality, it is recommended that an Architect Retention Clause is included in the S106 should planning permission be granted. Detailed conditions in relation to materials, architecture, landscape and public realm are also recommended and will help to address the identified concerns. This will include conditions requiring submission of detailed drawings of key thresholds, openings, parapets, typical bays etc as well as submission of material samples and some on-site 1:1 mock-ups of key elements of the external envelope.

Heritage Conclusions

- 9.82 It is acknowledged that the proposal represents a significant addition to the townscape form of the area and the Conservation Area introducing a range of heritage and design considerations. Extensive discussions and debate internally have resulted in amendments to the proposal which seek to strike a balance between minimising harm to the identified heritage assets, urban design and public realm considerations, whilst also seeking to optimise the development potential of the site having regard to the challenging housing targets set out in the London Plan and the Council's position in terms of the housing delivery test. Notwithstanding there remain concerns resulting in a conclusion that the proposed development would cause less than substantial harm to the character and appearance of the Conservation Area.
- 9.83 The provision of housing across all tenures, but particularly affordable family sized housing, is a priority for the Council and the overall delivery of new residential units is not only a public benefit, it must carry significant weight in the overall assessment in light of the "tilted balance". Due to planning constraints affecting the site, the amendments to the proposal have already resulted in a reduction in housing provision and a reciprocal decrease in affordable housing. Any further amendments to the scheme would further erode the level of housing provision including affordable housing. Whilst the outstanding impacts on the identified heritage assets are acknowledged it is considered that these can be minimised through the use of S106 and appropriately worded conditions to result in a development which will sit comfortably in this sensitive context and will provide much needed housing for the Borough.

Design – Character and Appearance

- 9.84 The development would involve the demolition of the existing vacant office building and the erection of two residential blocks. The northern block, fronting Church Street, would comprise 30 units of accommodation over 5 storeys and would accommodate a mix of private and affordable housing. The southern block would comprise 48 private residential units over 6 storeys.
- 9.85 The scene has evolved through discussions with officers the height of both blocks has been reduced to result in a more appropriate and sympathetic built form which can now be supported. This is further supported by high quality design of the development which utilises a mansion block typology. The design also demonstrates high quality architectural detailing and materials resulting in an acceptable appearance. As a result, it is considered the built form, height and design development would satisfactorily integrate into the street scene having regard to the requirements of adopted London Plan and DMD policy.
- 9.86 There are views of the development from Town Park which is designated Metropolitan Green Belt. London Plan Policy G3 (Metropolitan Open Land) confirms such land is to be afforded the same status as Green belt while DMD 83 (Development Adjacent to the Green belt) states that there should be no increase in

the visual dominance and intrusiveness of the built form by way of height, scale and massing when viewed from the adjacent land, there is a clear distinction with the Green Belt / MOL and any identified views or vistas are maintained.

- 9.87 The development replaces a large building but the proposal does represent an increase in the built form when compared with that existing. Nevertheless, the development is considered to be of high quality in terms of its design, architectural detailing and use of materials to and would not it is considered, adversely affect the open character of the MOL or users experience of the space. When set against housing need and the tilted balance, it is considered this is not sufficient to justify a reason for refusal.

Conclusion of Heritage and Design

- 9.88 On balance, and this is finely balanced given the issues raised, it is considered the proposed design to be acceptable. The conclusion that the proposed development would have less than substantial harm albeit at the upper end of that assessment, allows the consideration of the public benefits to be taken into account. The need for housing and provision of affordable housing (at LAR) at a maximum level the development can reasonable sustain having regard to the scheme's viability.
- 9.89 The Housing Delivery test has introduced the presumption in favour of approving sustainable residential development and this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. With this in mind, it is considered the negatives of this development do not outweigh the benefits and represent significant public benefits.

Residential Quality and Amenity

- 9.90 London Policy D6 sets out the London Plan criteria to ensure the delivery of new housing of an adequate standard. Despite the adoption of the London Plan 2021, the Housing Supplementary Planning Guidance Document (2016) remains an adopted document and a material consideration in decision making. The DMD contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing).

Internal Floorspace Standards

- 9.91 Policy D6 of the London Plan sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces. All of the proposed residential units will either meet or exceed the minimum required floorspace standards. In addition, all single and double bedrooms comply with the minimum required space standards (7.5 sqm for single bedrooms and 11.5 sqm for double bedrooms). Minimum floor to ceiling heights for all proposed homes will be 2.5m in compliance with the guidance.
- 9.92 London Plan Policy D7 requires at least 10% of new dwellings to constitute Building Regulations M4(3) wheelchair user dwellings. Of the proposed dwellings, 9 have been designed to meet this standard which equates to 14% of the new dwellings.

Daylight and Sunlight

- 9.93 London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability

of outside amenity space. It states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. North facing single aspect units should be avoided.

- 9.93 Buildings should be designed to maximise the number of dual-aspect dwellings but due to design / site optimisation, the current proposal contains a number of single aspect units (approximately 40% depending on definition). Bay windows have been employed, with varying degrees of success, to improve the quality of the internal environment where a flat has all windows in one elevation. While bay windows cannot be considered to result in true dual aspect accommodation, it is acknowledged that they can be used to significantly improve the internal environment in higher density developments. Nevertheless, there are 4 x 1-bedroom north facing flats between floors 1 and 5 in the southern block which face towards the rear of the front block.
- 9.94 In support of the development, the applicant has commissioned a daylight and sunlight assessment (dated 31st August 2020) to assess the quality of the internal residential environment for future occupiers. This has been carried out in accordance with the BRE guidelines and concludes that 86% of the proposed windows (across the development) will meet the minimum standard in terms of access to daylight. Where daylight is hindered it is normally bedrooms that are impacted which are considered less sensitive than primary living spaces. Furthermore, it is recognised that BRE guidance outlines that the numerical guidelines should be interpreted flexibly.
- 9.95 In the context of aiming to ensure developments make optimal use of the potential of a site, the NPPF also states (Paragraph 125) that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site. In addition, Policy D6 of the London Plan states that
- “ A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.*
- 9.96 With this in mind, it is considered that this approach has been design led and whilst not ideal, the development will deliver a satisfactory standard of proposed accommodation and when balanced against the other policy objectives, can be supported.

Overlooking

- 9.97 The relationship between the rear of the front block and the front of the rear block is also relevant in the consideration of potential for overlooking between the flats. In considering opposing habitable room windows there is approximately 8m between windows. This falls short of the distancing standards set out in DMD 10 (Table 2.2). However, it is acknowledged that in order to meet the acute housing needs of the Borough a greater flexibility in these standards will be required to optimise the potential of sites. Moreover, this is an internal relationship between new units rather than a relationship to an existing neighbouring property. It is also noted that, where possible, windows have been positioned at an angle or offset with each other to minimise issues of overlooking.

- 9.98 At ground floor level, the south western corner of the front block and the north western corner of the rear block contain provide bicycle and bin storage. This addresses any potential concerns regarding privacy in this location. The south eastern corner of the front block and the north eastern corner of the rear block each contain one 2-bed dual aspect flat. It is noted that landscaping is proposed in front of both these flats to minimise overlooking from the opposing flat and the public space between the buildings. Details of the landscaping will be secured by condition to ensure it is sufficient to minimise any privacy concerns pertaining to these units.

Internal communal space

- 9.99 The entrances to the two buildings would be level and the communal corridors would have a rational and efficient arrangement with the use of lifts and stair cores to service the flats.

Amenity Space Provision

- 9.100 Policy DMD9 provides the standards for the level of private amenity space provision for each unit and is primarily based upon the number of rooms and occupancy level. The standards represent the absolute minimum, although regard must also be given to the character of the area. All of the units will provide private amenity space in the form of terraces or balconies in compliance with policy DMD9.
- 9.101 It is noted that the ground floor terraces for the flats on the eastern elevation of both blocks will face towards the New River path. The change in levels between the terraces and the path will help maintain a sense of privacy. A low level hedge boundary and additional planting is also proposed. Further details on this would be required by condition. It is essential that the boundary treatments along this boundary remain at a low level to allow an appropriate transition between the development and the New River. High boundary fences or enclosure of any form in this location would not be considered appropriate and would have an adverse impact on the character of the area. The treatment of the rear block is particularly significant given its proximity to the site boundary.
- 9.102 Communal amenity space is also proposed in the form of landscaped areas for leisure and children's play including a communal roof terrace. This is discussed in detail later in this report.

Fire Safety

- 9.103 London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 9.104 This application was submitted prior to this London Plan requirement and no fire strategy is required to be submitted. However, it is agreed a detailed fire strategy will be secured by condition prior development commencing.

Secure by Design

- 9.105 The Designing Out Crime Officer has advised that they are supportive of the development in principle. A condition is to be imposed to ensure that the development complies with SBD principles.

Neighbour Amenity

- 9.106 London Plan Policy D6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. 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 and Sunlight

- 9.107 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. 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”. However, 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...”

- 9.108 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.
- 9.109 A ‘Daylight & Sunlight’ 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:
- 9 Old Park Avenue
 - 90 Church Street
 - 1-3 Cecil Road
 - 2-6 Old Park Avenue
- 9.110 The tests were undertaken in accordance with the BRE Report 209 ‘Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice’ (second edition, 2011). The report concludes that there is full adherence to the BRE guide for rooms within 9 Old Park Avenue, 1 Cecil Road and 3 Cecil Road. It identifies that isolated minor transgressions occur to 90 Church Street but where these do occur, these are to windows that serve rooms with multiple windows, the remaining windows meeting the BRE targets.
- 9.111 The report identifies that the most noticeable change in daylight and sunlight occurs to Nos 2-6 Old Park Avenue. However, it is noted that the report was produced prior to amendments to the scheme which reduced the height of the rear block by one

storey and moved the western elevation further from the boundary. Despite the assessment being made in relation to the original more harmful proposal the assessment concludes that “although more noticeable transgressions occur, the retained values will be commensurate for an urban environment”. Overall, it is considered that the proposal as revised will not have an unacceptably adverse impact on neighbouring residential occupiers in terms of loss of light or outlook.

Privacy, Overlooking and Outlook

- 9.112 It is considered that the existing residential properties most affected by the proposed development in term of privacy, overlooking and outlook are Nos 2-6 Old Park Avenue, 90 Church Street and Nos 1-3 Cecil Road. Number 90 Church Street and Nos 1-3 Cecil Road are located to the east and south east of the subject site and their siting and orientation is such that they do not have a direct window to window relationship with the proposed development. They are also separated from the proposed development by the New River. Having regard to this relationship, it is considered that the proposal would not have an unacceptable impact on these properties in terms of loss of privacy or overlooking. It is noted that the rear block would result in some overshadowing of the neighbouring properties, particularly No 90 Cecil Road in the late afternoon/ evening where there will be an impact on the rear garden space. However, this is not considered to be significant and having regard to the need to optimise brownfield sites within town centre locations and the tilted balance, the level of overshadowing is considered to be acceptable.
- 9.113 Officers consider the relationship of the proposed development (rear block) with Nos 2-6 Old Park Avenue to be the most sensitive, particularly in relation to the effect of the flank elevation on the outlook and sense of enclosure experienced by these properties. In this regard the proposal has been amended to reduce the impact on these properties. The rear block has been moved further from the common boundary such that there is now a separation in excess of 4m from the boundary above ground floor level and c. 18m to the rear elevation. This is recognised as significant improvement to the proposal and one which is now considered to result in an acceptable relationship with the neighbouring properties having regard to the planning balance and the need to optimise development on brownfield town centre sites.
- 9.114 In term of overlooking and privacy, a great deal of consideration has been given to the treatment of the west elevation of the proposed development. Windows are considered to provide an important role in breaking up the massing of the elevation and provide visual interest. However, they must not result in unacceptable overlooking of neighbouring residential sites. The windows in the west elevation have been minimised to prevent unacceptable overlooking of the neighbouring sites. Windows that are present in the elevation are either secondary windows or serve bathrooms and therefore will be obscure glazed. On balance, the position and number of windows in the western elevation are considered acceptable.

Noise and Disturbance

- 9.115 Guidance relevant for the assessment of noise affecting new developments is given in the National Planning Policy Framework (NPPF). Paragraph 185 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’.

- 9.116 Meanwhile Policy D14 of the London Plan 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 any 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, the London Plan 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.
- 9.117 The proposed residential development is consistent with the existing prevailing use in the area and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the proposal. Furthermore, in terms of general disturbance, the previous use of the site was as an office with car parking. The current proposal is for a purely residential development with very limited car parking. The pattern of people’s movements will perhaps change, with comings and goings likely to be more spread out throughout the day, but it is unlikely to generate more general disturbance than the office use. The removal of the majority of car parking from the site is likely to reduce general disturbance for nearby residential occupiers.

Light Pollution

- 9.118 It is recognised that that there is the potential for some level of light pollution arising from the development as the building is larger and taller than that previously on site. However, it is not considered light generating from the flats would be unreasonable given they are expected to be used in a normal residential fashion. A planning condition is recommended that details of any external lighting are provided by condition to ensure that this will be acceptable in relation to existing neighbouring residents and future occupiers of the development. As well as ensuring that there is not an unacceptable impact on the Enfield Town Conservation Area and other heritage assets.

Conclusion of Neighbouring Amenity Considerations

- 9.119 Having regard to the above, the proposed development is, on balance, considered acceptable in relation to the impact on neighbouring residential amenity in line with relevant policies DMD 8, 37 & 68, CS Policy 4 and London Plan Policies D4, D6 and D14. Conditions pertaining to obscure glazing and external lighting are recommended to ensure that an acceptable level of residential amenity is maintained.

Transport, Access and Parking

- 9.120 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards. Policies T6 and T6.1 to T6.5 set out car parking standards. Policy DMD 45 makes clear that the Council aims to minimise car parking and to promote sustainable transport options.

Car Parking

- 9.121 Apart from blue badge spaces (see below), the proposed development would be 'car free'. 'Car free housing development' is supported in London Plan policy and Enfield DMD Policy 45, subject to conditions and Section 106 obligations, where sites have good access to public transport services and are located within or near a designated town centre. The intention is to reduce reliance on the private car and to encourage sustainable transport choices (walking and cycling).
- 9.122 It is noted that a number of objections have been received in relation to this aspect of the proposal. However, the site has a PTAL of 6A and is located within a town centre, with frequent bus services, and in close proximity to both Enfield Town and Enfield Chase stations. The principle of a car free development in this location is therefore supported by Officers. Furthermore, future residents will be restricted from applying for parking permits within the CPZ and will therefore not be able to park locally. As such, the availability of parking for existing residents will not be impacted by the proposed development. This will be secured by a S106 Agreement. As part of this the applicant will be required to cover the cost of modifying the Traffic Order relating to the CPZ so that the site is properly exempted.
- 9.122 The existing car parking for St Paul's Centre will be maintained. In line with the current arrangement, 100 Church Street will retain right of access over the car park to serve the development. Representatives from St Pauls Centre have raised an objection in relation to the proposed impact of the development on their day to day use of the car park. However, the previous office use would have involved 40-50 car accessing the office car parking via the same access arrangement. The current proposal only proposes 3 blue badge parking spaces as well as access for deliveries and servicing. It is anticipated that this will have a lesser impact on the neighbouring use and car park than the previous office use and associated parking.

Blue Badge Parking Provision

- 9.123 Policy T6.1 (G1) of the London Plan requires that for major residential development parking is provided on site for disabled residents. 3% disabled parking provision is required. The proposal meets this policy requirement. In addition, development proposals should demonstrate where a further 7% of DPBs could be provided on site should the need for such provision arise in the future. This equates to 6 spaces and as submitted, no provision has been made for this within the development. The suggestion that this provision can be made on street is not considered acceptable policy. Whilst there is some flexibility and ideally at least two further disabled spaces should be capable of being accommodated in the future within the curtilage, the Applicants have advised that this is not achievable without reducing the built footprint and in turn the number of residential units proposed.
- 9.124 Having regard to the tilted balance and the need to optimise the delivery of new homes on this highly sustainable site, it is considered that it would be satisfactory to compensate for the failure to meet a policy requirement on site by providing an accessible transport contribution to support improvements in the nearby town centre, if there were additional demand in excess of the 3% DPBs on site, in the future. This approach is currently being explored and, once agreed, it would be secured through a S106 Agreement.

Electric Vehicle Parking

- 9.125 Plan Policy T6.1(C) requires that at least 20% of new parking spaces should have active charging facilities, with passive provision for all remaining spaces. In this instance 3 parking spaces are proposed. This equates to the need for 0.6 spaces (1 space) to have active charging facilities and passive provision should be made available for the 2 other spaces. This can be secured by condition.

Cycle Parking

- 9.126 Policy T5 of the London Plan sets out cycle parking requirements. The proposal would provide 140 long stay cycle parking spaces in accordance with the requirements. 36 of these would be provided in two-tier spaces at ground floor level in the southern block. 96 two-tier spaces are proposed in the basement of the northern block. At ground floor level in the northern block, 8 Sheffield stand spaces are proposed. Four short stay cycle parking spaces are also proposed within the external parking/ courtyard area (siting to be agreed by condition) as required by London Plan policy.
- 9.127 It is noted that while the cycle parking provision is acceptable in numerical terms, there are concerns about the location, particularly the 96 spaces which are proposed in the basement of the northern block. Policy requires that cycle parking provision must be easily accessible and convenient to encourage its use. The Transportation Officer has advised that, as proposed, the location of the cycle parking is likely to act as a barrier to cycling as the spaces are not easily accessible and it would be inconvenient for people who do not live in that building but may be expected to park there. In order to address this failure to meet a policy requirement, it has been agreed that a contribution could be made toward off-site public cycle parking provision. This is to be agreed and secured through a S106 Agreement.
- 9.128 A condition is also required to ensure that the doors to the cycle storage are a minimum of 1.2m in width to ensure they meet the minimum policy requirement.

Active Travel Zones and Healthy Streets

- 9.129 A framework Travel Plan has been submitted. This suggests that providing cycle parking and information on local walking and cycling routes for future residents of the development will result in a 5% and then 10% increase in active mode share at 2 and 10 years respectively. This is accepted as a draft approach. However, it will need to be supported by a Sustainable Transport Package that will be required via S106 Agreement. In line with the standard contributions calculator this will include:
- Car Club Membership
 - Oyster cards
 - Cycle Campaign Membership – c. £35,065
 - Healthy Street Contribution – c. £28,629
- 9.130 The final Travel Plan must also include a full Healthy Streets Transport Assessment and an Active Travel Zone Assessment. This will enable Officers to identify the way in which contributions around the site should be spent, and properly understand routes around the site for pedestrians and cyclists and how these will encourage active travel.

Construction Traffic

- 9.132 A Construction Management, Quality & Environmental Plan has been submitted with the application. Officers are in broad agreement with the information but will secure a final statement through an appropriate condition.

Refuse and Recycling

- 9.133 Secure, appropriately sized refuse and recycling stores are provided within each block, close to communal entrances. Each will have key fob-controlled access and will be monitored by the CCTV system. Refuse will be collected within the site with a refuse vehicle able to get within acceptable collection distances of all entrances. Vehicle tracking has been provided to ensure that a refuse vehicle can manoeuvre acceptably within the site.

Conclusion on Transport, Access and Parking

- 9.134 Overall the proposed approach to access, parking and servicing is acceptable. This is subject to the mitigation measures outlined, which will be secured within a S106 Agreement, and appropriate conditions being attached to the permission.

Landscape, Play, Biodiversity and Trees

- 9.135 Chapter 8 of the London Plan – Green Infrastructure and the Natural Environment, has a number of policies setting out the London Plan’s position on various matters ranging from the delivery of green infrastructure, to the requirements for new development, in their impacts to biodiversity, approach to drainage and open space and landscaping offer.
- 9.136 Policy G5 outlines that major development proposals should contribute to the greening of London by including urban greening by incorporating measures such as high-quality landscaping, green roofs, green walls and nature based sustainable drainage. Although of very limited weight, the draft Local Plan for Enfield Policy BG8 also outlines that new development will need to demonstrate how it will exceed the urban green factor targets set out in the London Plan. Policy G5 outlines that the Mayor recommends a target score of 0.4 for developments that are predominantly residential.
- 9.137 Policy G6 of the London Plan seeks to ensure development proposals manage impacts on biodiversity and aims to secure net biodiversity gain while Policy G7 outlines that wherever possible, existing trees of value are retained and where trees are proposed to be removed, there should be an adequate replacement. Furthermore, Policy S4, also of the London Plan, outlines that development proposals for schemes that are likely to be used by children and young people should, for residential development, incorporate good-quality accessible play provision for all ages. It outlines that at least 10sqm of play space should be provided per child. In addition, in 2019 the GLA introduced an updated play calculator against which applications should be assessed.
- 9.138 Core Strategy Policy 34 and 36 and Policies 71, 72, 73, 78, 79 and 80 of the Development Management Document sets out the Council’s positions regards the protection and enhancement of open space, children’s play space, ecological enhancements and the treatment of trees on development sites.

- 9.139 The Council has also adopted its Blue and Green Strategy (June 2021) which sets out how the Borough's open spaces, habitats, landscapes and water assets will be protected, maintained, enhanced and expanded over the next ten years.

Landscaping

- 9.140 An illustrative landscape masterplan has been submitted which sets out the site wide approach to soft and hard landscaping as well as identifies tree planting locations and where existing trees are to be removed or retained.
- 9.141 As outlined within the submitted Tree Survey and Impact Assessment, the proposal will involve the removal of a small number of trees across the site - 5 trees are identified for removal as well as stems from a group of sycamore trees, and a short row of western red cedar trees. The tree report notes that the majority of tree across the site are not of any particular merit and therefore their removal to facilitate the development is broadly accepted. However, in the north eastern corner of the site there are three large trees adjoining the river which are of more significant amenity value. The report states that the proposal will be able to proceed without having an unacceptable impact on two of these trees and they will be retained. The third tree, a lime, shows fruiting bodies of a decay fungus and needs to be removed. The Council's Tree Officer has not objected to the removal of this tree due to its poor health.
- 9.142 London Plan Policy G7 states that where development proposals result in the removal of trees, adequate replacement trees should be planted based on the existing value of the trees to be removed. The illustrative masterplan identifies that 13 semi mature trees are to be planted around the site 6 trees at ground level and 7 to the roof terrace. The tree planting has been carefully considered to avoid competition between new trees and the existing prominent trees along the river.
- 9.143 Other landscape features proposed include, biodiverse planting, private gardens with ornamental woodland style planting for shade and feature shrub planting, defensible hedgerow planting to the edge of private gardens, biodiverse planting for shade with multi stem shrub planting for privacy and native species rich meadow planting.
- 9.144 Full details on all the landscape features will be required by condition including in relation to size, height and proposed species. The treatment of the boundary between the development and the New River must be landscaped particularly sensitively to ensure a natural appearing transition between the private and public spaces.
- 9.145 Having regard to Urban Greening (Policy G5 of the London Plan), an urban greening factor score has not been submitted as this application was submitted prior to adoption of the new London Plan. However, it is considered that this can be included as part of the detailed landscaping strategy to ensure the landscaping proposals provide the required benefits. A score of 0.4 will normally be accepted for new residential developments.
- 9.146 It is noted that the landscape masterplan identifies 'potential future connection to the river side' acknowledging that part of the land required for this is outside of the subject site. This pedestrian connection to the New River path is regarded as an important aspect of the proposal, particularly for residents of the rear block. Securing this access will be a requirement of the S106.

Play Provision

- 9.147 London Plan Policy S4 requires that new residential development should deliver at least 10sqm of play space per child. Based on the GLA population yield calculator, the development should provide 222.2sqm of play space mainly focused at the lower age groups for children between 1 and 9. The application proposes 172 sqm of dedicated children's play space at roof level of the northern block with further opportunities for informal play around the wider site.
- 9.148 While the proposal does not fully meet the London Plan requirement, all the 3-bed units, which are most likely to have child occupants, will be located within the northern block and therefore will be well located to make use of the dedicated play space. There are also public open spaces within very close proximity of the site, notably Town Park which is within close walking distance.
- 9.149 On balance and having regard to the other benefits of the scheme, the proposal is considered acceptable in this regard. Conditions are recommended to require the submission of details of the type and arrangement of play equipment to be provided across the site.

Biodiversity

- 9.150 Policy G6 of the London Plan states that development proposals should support the protection and conservation of priority species and habitats and promote opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context. Core Policy 36 of the Core Strategy confirms that all developments should be seeking to protect, restore, and enhance sites. 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.
- 9.151 This application is supported by an Ecological Impact Assessment which has assessed the existing biodiversity value of the site, the potential impacts of the development on biodiversity, mitigation measures and recommended ecological enhancements.
- 9.152 In relation to ecology, the majority of the site is of low ecological value. It comprises of hardstanding and buildings, with some species poor amenity grassland in the eastern part of the site. The existing trees on-site and off-site (but close to the boundaries) provide a habitat of moderate ecological value, which has the potential for seasonal use by breeding birds and for use by roosting/foraging bats.

Bats

- 9.153 All species of bat and their habitats are fully protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside Rights of Way Act 2000), and by the Conservation of Habitats and Species Regulations 2010, which consolidates all the various amendments made to the Conservation (Natural Habitats, &c.) Regulations 1994 in respect of England and Wales.
- 9.154 The 1994 Regulations transposed Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into national law. The legislation makes it illegal under the Wildlife and Countryside Act 1981 (as amended) to:
- Intentionally or recklessly kill, injure or take a wild bat;

- Be in possession or control of any live or dead wild bat, or any part of, or anything derived from a wild bat;
- Intentionally or recklessly damage, destroy or obstruct access to any place that a wild bat uses for shelter or protection; and
- Intentionally or recklessly disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection.

9.155 Bats are also European Protected Species (EPS). As such under the Conservation of Habitats and Species Regulations 2010 it is an offence to:

- Deliberately capture, injure or kill any wild animal of a European Protected Species;
- Deliberately disturb wild animals of any such species. Disturbance of animals includes in particular any disturbance which is likely to:

i) impair their ability -

- to survive, to breed or reproduce, or to rear or nurture their young; or
- in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

ii) to affect significantly the local distribution or abundance of the species to which they belong;

- Deliberately take or destroy the eggs of such an animal; or
- Deliberately damage or destroy a breeding site or resting place of such an animal.

9.156 A Preliminary Ecological Assessment (PEA) was undertaken by a consultant ecologist in accordance with published guidelines. During the internal and external assessment of the commercial building there was no evidence of bats recorded and only low potential for bats was identified. However, as the site is located adjacent to a river corridor a single dusk emergence survey was also carried out. This identified intermittent common pipistrelle bat commuting/ foraging in association with the river corridor to the east of the site, along with occasional noctule bats recorded commuting/ foraging high over the river.

9.157 Since there was no evidence of bats recorded during the PEA survey, with no bats being recorded emerging from the building, it is considered that there is no significant risk of direct impacts to bats as a result of the proposed works.

9.158 In relation to the commuting/foraging bats recorded during the dusk emergence survey, in association with the river corridor to the east, it is noted that the proposed works could have an indirect impact on bats using this river corridor, if any new artificial lighting scheme illuminates this area, since bats are nocturnal animals that will generally avoid illumination. To avoid the risk of this occurring, precautionary mitigation measures are recommended.

9.159 Any new artificial lighting scheme will need to broadly comply with the principles of the Institute of Lighting Professional (ILP) and BCT published guidance note 08/186, primarily by avoiding illumination of the trees and adjacent river corridor, along with ensuring that all lighting is low-level, downwardly directional and controlled by motion sensors/timers (where practical). Details of the proposed external lighting scheme will be secured by condition. In addition, if at any time during the proposed works, it becomes apparent that bats are present and at risk of direct impacts, works will need to cease whilst an experienced ecologist is contacted and consulted about how to proceed without the risk of an offence being committed. This will also be secured by condition.

Breeding Birds

- 9.160 Breeding birds are protected under the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally or recklessly kill, injure or take any wild bird or take, damage or destroy its nest whilst it is in use or being built, or to take or destroy its eggs. In addition, some species of bird are listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), for which there are additional offences of disturbing these birds at their nests, or their dependent young.
- 9.161 There was no evidence for actively breeding birds recorded during the PEA survey, which was undertaken outside the breeding season (March-July/August), although it was identified that there are potentially suitable habitats present throughout the site, including larger shrubs/climbers within the miscellaneous planting and scattered trees, some of which will be removed/disturbed to facilitate the proposals. Therefore, breeding birds could be directly impacted by the proposed works, if undertaken during the breeding season (March-July/August). To avoid the seasonal risk of impacts to breeding birds, precautionary mitigation measures are recommended.
- 9.162 These include disturbance/removal of potentially suitable habitat to be undertaken outside of the breeding bird season. If it is necessary to conduct such work during the breeding season, this should be carried out under the supervision of an experienced ecologist, who will check for the presence/absence of any birds' nests. If any active nests are found, then works with the potential to impact on the nest must temporarily cease and an appropriate buffer zone should be established until the young have fledged and the nest is no longer in use. This will be secured by condition.

Ecological Enhancements

- 9.163 The NPPF at paragraph 174 states that *"the planning system should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"*. Therefore, the following measures are recommended to improve the biodiversity value of the site:
- The soft landscaping scheme should specify at least 70% native species of plant, or non-native species with a known benefit to wildlife. This should include a variety of small trees, large shrubs, herbaceous plants, climbers and bulbs, to provide a diversity of habitat type/structure and benefit local biodiversity;
 - Use of green/brown roofs/walls within the development will further benefit local biodiversity. It is noted that a green roof is included on the roof of the southern block – details of this to ensure it is providing maximum biodiversity value will be required; and
 - each new block should include 2 no. (i.e. 4 no. in total) small wall integrated bat boxes, along with 4 no. (i.e. 8 no. in total) wall-integrated bird boxes, suitable for house sparrow and swift. The bat boxes should be installed above 4-5 metres and not illuminated by artificial lighting and the bird boxes should be installed above 3-4 metres and above 7-8 metres for house sparrow/swifts respectively, but not on south-facing walls, to avoid the risk of overheating during summer.
- 9.164 The identified ecological enhancements will be secured by condition.
- 9.165 Having regard to the above, the proposed development will not unduly impact upon the existing ecological value of the site but through measures proposed and to be

secured by condition, will serve to enhance the value of the site in accordance with policy G6 of the London Plan, CP36 of the Core Strategy and policy DMD79 of the Development Management Document.

Sustainability and Climate Change

- 9.166 Paragraph 154 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. The London Plan and Enfield (Regulation 18) emerging Local 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.
- 9.167 London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan’s requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme’s performance.
- 9.168 London Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 9.169 London Plan Policy SI 4 outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy. 9.182. NPPF Paragraph 157 outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.

Minimising Greenhouse Gas Emissions

- 9.170 An Energy Assessment has been prepared which provides an overview of the energy and sustainability strategies for the proposed development. The document demonstrates how the proposal has sought to meet London Plan requirements inclusive of the energy hierarchy and relevant Council policies.
- 9.171 The report notes that the development aims to improve upon building regulation CO2 emission targets through fabric and building service efficiencies by 10% over Part L 2013 regulations. It shows that 18% is being achieved through the ‘BE LEAN’ stage of the project. The addition of heat pump technologies is expected to reduce the development’s CO2 emissions by a further 46%, to a total of 64% improvement, which meets the London Plan overall requirement of a 35% betterment over Part L 2013 regulations.

- 9.172 London Plan Policy SI 2 states that where a zero-carbon target cannot be fully achieved on site, a carbon off-set contribution is required. The remaining 36% of carbon emissions from the original Part L 2013 baseline shall be offset via the GLA's carbon offset payment. This will be secured through the S106 Agreement.

Overheating

- 9.173 As part of the energy assessment, dynamic thermal modelling of the overheating risk associated with the apartments has also been undertaken in accordance with CIBSE TM59 guidance. Supporting text to Policy SI 4 (paragraph 9.4.4) outlines that passive ventilation should be prioritised where appropriate and that where air conditioning systems, including active cooling systems are unavoidable, these should be designed to reuse the waste heat they produce.
- 9.174 Having tested fully passive ventilation, it is noted that some mechanical ventilation will be required for this proposal particularly during summertime in apartments where there is an acoustic risk from open windows.
- 9.175 The report recognises that a full air conditioning system for cooling purposes is energy intensive and therefore an alternative more energy efficient approach shall be taken to provide cooling. This shall be in the form of peak "lop" cooling utilising cooling of supply air into habitable spaces which shall be automatically controlled and switched on via space temperature sensors. This shall restrict the use of the tempered air cooling to time periods when they are required only.
- 9.176 Full details of the proposed mechanical ventilation system, its operation and extent shall be required by condition. This shall demonstrate that mechanical ventilation has been minimised throughout the development.

DEN (Decentralised Energy Network) Connection

- 9.177 At the time of submission, the applicant did not intend to connect to the Energetik Decentralised Energy Network (DEN) as, at the time, the DEN was not in close proximity to the site. However, the DEN is now expected to extend along Church Street. It is noted that the Energy Statement confirms that the proposal will be designed to be capable of connection to the DEN and this will be secured through the s106 agreement. If the development is able to make connection to the DEN it is possible that the carbon offset contribution required by S106 would be reduced.

Air Quality

- 9.178 London Plan Policy S1 1(B,2,c) (Improving Air Quality) outlines that major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements as set out within the policy.
- 9.179 An Air Quality Assessment has been prepared by Stroma. The assessment has considered: the construction phase impact (dust), the road traffic impact, and includes an air quality neutral assessment. Overall it shows that the development will be air quality neutral.
- 9.180 The construction phase will have the potential to create dust, and it is expected that any impacts will be medium to low. However, subject to appropriate mitigation measures this can be reduced to low to negligible. These Best Practice mitigation measures have been included within the report and adherence can be secured by condition.

- 9.181 The operational impacts of increased traffic emissions arising from the additional traffic on local roads, due to the development, have been assessed. In addition, the impacts of local road traffic on the air quality for future residents have been assessed within the new development itself.
- 9.182 The proposed development will only increase traffic volumes on local roads by a small amount. These changes will lead to an imperceptible increase in concentrations of nitrogen dioxide and PM2.5 at all existing receptors, and the impacts will all be negligible.
- 9.183 In terms of the development itself, the report shows there will be slight exceedances of the annual mean for nitrogen dioxide at two ground floor flats. The report does not make any mitigation recommendations for this, but the Environmental Health Officer has confirmed that this can be addressed by condition.

Contamination

- 9.184 A contamination report has been submitted. This states that a site investigation will be required. In accordance with the advice of the environmental health officer, details to deal with the contamination of the site to avoid risk to health and the environment will be required by condition.

Flood Risk and Drainage

- 9.185 London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield runoff rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.
- 9.186 Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for major development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage Strategies and maximising the use of Sustainable Urban Drainage Systems (SuDS).
- 9.187 A Groundwater Flood Risk Assessment (May 2021) and a SUDs strategy have been submitted with the application. The Council's SUDS Officer has confirmed that the Ground water Flood Risk Assessment is acceptable. The SUDs strategy has been reviewed and updated in consultation with the Council's SUDs Officer. The updated SUDs strategy is supported in principle. However, there are no source control SUDs measures for the northern building and the extent of green roofs on the southern building need to be confirmed. In addition, the developers need to confirm the final sewer connections and RWP locations. These elements can be addressed by condition.

10. Socio-economics and Health

Socio-Economics

- 10.1 London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end use phases.

- 10.2. Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 10.3 To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that s106 planning obligations secure the following:
- Local Labour (during demolition and construction phases):
 - Employment & Skills Strategy submitted and approved prior to commencement
 - All reasonable endeavours to secure 25% of workforce
 - Apprenticeships or trainees
 - Local goods and materials
 - Employment & training:
 - Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets.
 - Training opportunities
 - Partnership working with local providers/programmes

Health Impact Assessment

- 10.4 London Plan Policy GC3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to an outlined criterion.
- 10.5 This application is accompanied by a Health Impact Assessment. The assessment outlines health profile baselines which have informed impacts of the proposed development. Overall, the assessment concludes that the proposed development will generally have a positive impact on the health of the future and local residents.
- 10.6 The outcomes set out within the Health Impact Assessment aim to demonstrate that the proposed development has incorporated a number of measures into the design to ensure its impact on health is as positive as possible throughout both the construction and operational phases. Officers agree with the conclusions set out, and for reasons set out within this report, are of the view that the development takes steps to address Policy GC3's outlined criteria.

11. Section 106 / Legal Agreement

Having regard to the content above, it is recommended that should planning permission be granted, the following obligations / contributions should be sought and secured through a legal agreement.

Affordable Housing

- The securing of 9 units in total for on-site affordable housing provision: 4 x 3-bed 4 person, 4 x 2-bed 4 person and 1 x 2 bedroom 3 person - all provided as LAR.
- Provision to include a review mechanism (to be agreed with the Applicant in line with the Mayors Affordable Housing and Viability SPG 2017)

Transport and Highways

- Funding towards/ measures to provide off-site public cycle parking provision within Enfield Town (contribution/ measures to be identified and agreed)
- Funding towards/ measures to improve public access for the disabled within Enfield Town (contribution/ measures to be identified and agreed)
- CPZ parking permits restricted for future residents – including costs associated with modifying the Traffic Order
- Sustainable Transport Package:
 - Car club membership
 - Oyster cards
 - Cycle campaign membership c. £35,065
 - Healthy Streets contribution c. £28, 629
- Travel Plan

Climate Change, Flooding and the Environment

- Contribution (Carbon Offset Payment) towards the Carbon Offset Fund (utilised by LB Enfield towards the provision of measures for securing CO2 reduction in the vicinity of the Site). Amount to be finalised dependent on discussion with applicant regarding connecting to the DEN.

Business Employment and Skills

- Local Labour (during demolition and construction phases):
 - Employment & Skills Strategy submitted and approved prior to commencement
 - All reasonable endeavours to secure 25% of workforce
 - Apprenticeships or trainees
 - Local goods and materials
- Employment & training:
 - Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets.
 - Training opportunities
 - Partnership working with local providers/programmes

Design

- Architect retention - As per paragraph 9.81 supporting London Plan Policy D4, retention of Architects.
- Pedestrian connection to the New River Path

Monitoring

- 5% monitoring fee

12. Community Infrastructure Levy (CIL)

- 12.1 Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure. The CIL contribution will be reported at the meeting.
- 12.2 The development of social housing is exempt from MCIL under the Planning Act . A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

13. Conclusion

- 13.1 The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF, states that planning permission should be granted unless *“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”*. Designated heritage assets are listed as areas or assets of particular importance. Consequently, these policies must be applied to determine whether they provide a clear reason for refusing the development.
- 13.2 Having regard to the assessment in this report, the development would cause ‘less than substantial harm’ to identified heritage assets. This is not, in itself, a clear reason for refusal. Paragraph 199 of the NPPF sets out the balance to be taken to appraise whether this ‘less than substantial harm’ will provide a clear reason for refusal.
- 13.3 ‘Less than substantial harm’ to the significance of a designated heritage asset should be weighed against the public benefits of the proposal. In this case, the public benefits of the development include the social and economic benefits of the provision of market and affordable housing in the context of the sharp housing requirement in the Borough, as well as the other economic and social benefits of the increased use of local facilities and amenities, and employment during construction. It is considered that these public benefits outweigh the ‘less than substantial harm’ identified.
- 13.4 Consequently, the application of policies in the Framework which protect areas or assets of particular importance do not provide a clear reason for refusal. Limb ii. of paragraph 11(d) of the NPPF is therefore engaged, whereby planning permission should be granted unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”*. This is commonly referred to as the ‘tilted balance’.
- 13.5 It is acknowledged that and as is recognised throughout this report, that consideration of this proposal has involved finely balanced judgements. Compromises have been made in the consideration of the proposal in order to optimise the development potential of this highly sustainable brownfield site and thus contribute to the Borough’s challenging housing targets. It is recognised that sites such as this need to be optimised in order to minimise encroachment into the Borough’s Green Belt and protected SIL. It is considered that the social benefits of the proposal carry significant weight in favour of the proposed development. Further economic and social benefits include employment during construction, as well as the continued and improved use of local services and facilities.
- 13.6 It is considered that the conflicts identified with other Development Plan policies, as identified in the analysis section of this report, would not on their own or cumulatively significantly and demonstrably outweigh the benefits of the proposed development.

- 13.7 Overall therefore, it is considered the application proposes a high-quality residential development on existing underutilised, highly sustainable brownfield land which is identified for re-development in the Enfield Town Masterplan (2018). Officers acknowledge that due to the quantum of homes proposed and the resultant extent of site coverage there are shortcomings to the proposal as identified in the analysis section of this report. However, it is also recognised that there is a pressing need for housing, including affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. In this context the provision of 78 homes, including a policy compliant number of affordable homes, weighs heavily in favour of the development despite the acknowledged deficiencies with the proposal.
- 13.8 The applicant has engaged with the LPA in undertaking extensive pre-application advice inclusive of the development being presented to the Enfield Design Review Panel. The pre-application process involved the applicant considering design options to determine the most appropriate forms of development and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 13.9 Overall, and giving weight to the need for development which provide new homes, it is concluded that the development for reasons set-out within this report, to broadly accord with the adopted policy framework as well as relevant emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule, and within the Section 106 Agreement, the application is recommended for approval.



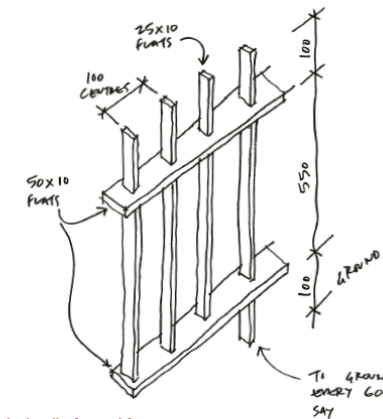
Southeast boundary



The boundary treatment to the southeast corner of the site is explained on the diagrams below, and the extended CGI on the next page.

The intention is for a low hedge to sit in front of a nominal 750mm high metal fence. These will demarcate the gardens (private amenity) behind.

It is acknowledged that the scheme relies on the external walls/doors for creating the secure lines, but this is intentional. A key part of the design strategy is based on providing equitable, quality external spaces, especially facing the river. This is achieved by striking a balance between integrating carefully with the surrounding context rather than creating fenced, isolated communities - which is wholly accordance with policy at all levels.



Sketch detail of metal fence

--- Proposed nominal 750mm high metal fence

■ Proposed hedge



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Kate Perry,
Planning Department,
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EN1 3XA

12 November 2021

MFNG/IM – 19/182
LPA Ref. 20/02858

Dear Kate,

100 CHURCH STREET, ENFIELD, EN2 6BQ
PLANNING APPLICATION REF. 20/02858

We write on behalf of our client, HPJ 11 Developments Ltd c/o Dominvs Group (the 'Applicant') with regards to planning application 20/02858 and the proposed development at 100 Church Street, Enfield, EN2 6BQ (the 'site').

The planning application was submitted to the Council on 1st September 2020 and comprised the following description of development:

"Redevelopment of site involving demolition of buildings and erection of residential units with associated car parking, cycle parking and landscaping."

Following ongoing discussions with Officers at the Council over the past 12 months, the Applicant has made a series of formal amendments to address a number of issues that have been raised by the Council and other stakeholders. This has involved a significant reduction in the overall quantum of development and included:

- Reducing the number of homes proposed from 91 to 78.
- Reducing the southern block from 7 to 6 storeys.
- Reducing the parapet height across both buildings to further reduce the visual impact.
- Reducing the footprint and setting back the southern building by 4m where it fronts Old Park Avenue.
- Increasing family housing by providing 3-bedroom homes in the London Affordable Rent component.
- And incorporating architectural details across the buildings to add visual interest.

Based on the amended proposed development, Officers recommended the application for approval at the Council's Planning Committee on 26th October 2021. However, Planning Committee Members voted that they were minded to refuse the application, subject to deferral to agree appropriate reasons for refusal.

From the discussions on the night, it is understood that Member's key concerns were broadly associated with the impact of the proposed development on the conservation area, which include the

relationship with the river, and how this impact is considered in the overall planning balance judgement. In addition, there were also concerns with the housing provision and addressing local housing need.

The Applicant has now had the opportunity to consider Member's comments. In the interest of continuing to work collaboratively with the Council to achieve a deliverable and much need residential development on the site, the Applicant is willing to put forward 'without prejudice' amendments and commitments to Member's for their further consideration in determining this important application.

a. Proposed Amendments and Commitments

To respond directly to Member's discussions at Planning committee, the Applicant is proposing the following:

- A 'without prejudice' offer of 2 x additional London Affordable Rent homes (1x2B3P and 1x2B4P) on ground and first floor in northern block, increasing the proposed level of affordable housing from 14.2% to 16.7% on a habitable room basis.
- A commitment to a detailed planning condition and S106 planning obligation to secure appropriate treatment of the river frontage, in terms of landscape design, boundary treatment, and long-term maintenance.

We have provided further commentary on each of these in turn below.

Increased Affordable Housing Provision

The 'without prejudice' proposed amendment to the overall level of affordable housing is an increase in on site affordable housing from 7 to 9 homes. This is an increase from 14.2% to 16.7% on a habitable room basis. The location of these homes are illustrated in the accompanying document prepared by MLA.

All these 9 homes will be at the London Affordable Rent level, where rents are capped to levels prescribed by the Mayor of London. One of the two additional homes will be a new family-sized home (2b4p).

The two additional London Affordable Rent homes will be high quality homes for local people, with an excellent outlook and both fronting on to the river.

This amendment specifically addresses an identified local need and will result in the provision of 8 out of the 9 LAR homes being appropriate for families.

Based upon this amendment, the overall housing mix would be as set out in the table below (NOTE: this amendment would not affect any of the submitted application drawings or the conclusions of supporting reports).

Unit Type	LAR	SO	PRIVATE
1 bed, 2 person	0	0	33
2 bed, 3 person	1	0	11
2 bed, 4 person	4	0	25
3 bed, 4 person	4	0	0
Total	9	0	69
OVERALL TOTAL	78		

As we have previously set out, our viability assessments have demonstrated an overall deficit against the Benchmark Land Value and therefore the scheme is unable to support additional affordable housing above the London Affordable Rent units that are proposed. This position has been scrutinised by a 3rd party independent assessor and they have agreed with this position. Notwithstanding that, the Applicant would be willing to agree to a review mechanism which will be secured in the S106. This would allow the affordable housing to be increased if the viability of the scheme improves over time.

Finally, for clarity, this proposed amendment is a 'without prejudice' offer to the Council. The Applicant is prepared to make this amendment to the proposed development in principle to justify a conclusion by the Council that the affordable housing and overall housing provision is necessary either to secure compliance with the development plan or to secure the provision of material considerations which indicate that permission should be granted notwithstanding any non-compliance with the development plan. It will be open to Officers to make the case for that conclusion in the report to Committee, and if Members agree, it would be open to them to resolve to grant planning permission subject to the completion of an appropriately worded S106 obligation.

However, should Members be minded to proceed with refusing the application, this offer would not form part of any future planning appeal.

River Setting

From the outset of the project, a key aspiration of the Applicant and Maccreanor Lavington's overall design approach has been to make the river a prominent feature of the proposed development and to positively respond to and enhance the river setting.

During discussions by Members at Planning Committee, some points of clarification and concerns were raised. To better assist the understanding of the proposed design approach, we have provided some further points of clarification below.

Between the proposed new buildings that front on to the river, distances between the edge of the path itself and gardens are 3m at the southeast corner (narrowest point) and generally 7m to the northern block. These distances are very reasonable considering the urban location of the site. Additionally, if you include the generous proposed 3m garden depths (of the homes that front the river), the buffer zones are even greater, and as such will provide an appropriate and overall enhancement to the river setting.

The proposed buildings are close to the site boundary in a very limited area when considering the entire length of the site, and importantly, when compared to the existing building (which is one continuous mass and provides no through access) and the area covered by the hardstanding of the existing car park.

Considerable effort has been made to set the majority of the new buildings back from the river, whilst still optimising the delivery of new homes on an allocated development site. These points are illustrated in the accompanying document prepared by MLA. This comprises information that has previously been issued to Officers during the course of the application.

Overall, the proposed landscaping strategy seeks to deliver a high quality environment across the site and in particular make a positive contribution to the riverfront. The landscape proposals seek to provide enhancements to biodiversity and access to the New River corridor along the boundary of the site. Mown grass, which is "species-poor", is proposed to be replaced with a transition of habitats including native species rich meadow, together with biodiverse and structural planting for shade. Additionally, the ground floor private amenity spaces have been designed to maximise opportunities for planting that can provide privacy, with woodland style planting and multi-stem shrubs, in addition to the evergreen hedgerow and railings proposed.

The Applicant is fully committed to delivering a high quality ground level environment across the site, and the river setting will play a major role in achieving this – both for the benefit of future residents, and members of the public that will use the newly created public routes through the site and river path. To provide a commitment and reassurance to Members that this is what will be delivered, the Applicant

can confirm that they are willing to agree to a detailed planning condition to secure the design details of the landscape and boundary treatments.

To further assist in this regard, we have provided below a suggested draft condition wording for Officers and Members consideration:

“Prior to the commencement of the relevant works, full details will be provided of the proposed landscaping works for the area fronting the river. This will include full details of all hard and soft landscaping, all planting and boundary treatments, together with a Landscape Management Plan to ensure the newly created public spaces are appropriately maintained. All the proposed works will be completed prior to the occupation of the proposed development.”

In addition to this planning condition, we propose that the Landscape Management Plan will also form part of the S106 obligations and will therefore be a legal requirement for the Applicant to fulfil over the lifetime of the development.

b. Summary

The Applicant would like to reiterate that they are fully committed to the delivery of new homes in Enfield. This is evident from their track record and continued commitment to try and work collaboratively with the Council to deliver an exemplar quality residential development at 100 Church Street.

Whilst the Applicant was disappointed with the outcome at Planning Committee on 26 October 2021, to respond directly to Member's concerns, the Applicant is proposing the following:

- A 'without prejudice' offer of 2 x additional London Affordable Rent homes (1x2B3P and 1x2B4P) on ground and first floor in northern block, increasing the proposed level of affordable housing from 14.2% to 16.7% on a habitable room basis.
- A commitment to a detailed planning condition and S106 planning obligation to secure appropriate treatment of the river frontage, in terms of landscape design, boundary treatment, and long-term maintenance.

To summarise, being allocated for residential development within the Enfield Town Masterplan, the site represents a significant and important part of the Council's strategic housing delivery strategy. The proposed development has a unique opportunity to deliver an exemplar quality scheme and a wide range of planning benefits of for the area and local community.

We trust that this letter is helpful and that it will be reported in full to the Planning Committee on 23 November 2021, but if you have any queries, or would like to discuss any aspect further, please do not hesitate to contact us.

Yours sincerely,



Nick Grant
DIRECTOR



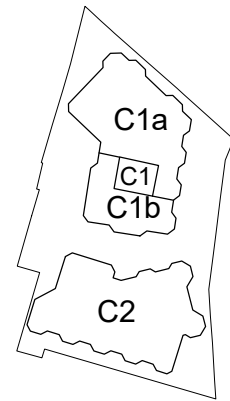
© Maccreanor Lavington Ltd.

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.



Application boundary

- Notes:
1. These drawings are issued for planning approval only - detailed coordination with technical consultant including structural, services and fire engineers is ongoing
 2. All areas stated are NIA/NSA unless noted otherwise and are for planning purposes only - they are approximate and may change during later design stages
 3. All heights stated are for planning purposes only - they may change during later design stages and material amendments will be notified as necessary
 4. Landscaping is shown indicatively only - for details of proposed public realm and landscaping refer to landscape architect's drawings
 5. Surrounding context in plan is based on OS map data dated 7/1/20



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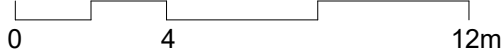
Proj. No.	Project	Client
508	100 Church street	HPJ 11 Developments Ltd
Sheet Name	Status	Planning
GA plan - Level 00		
CDE ID	Scale	Size
ENFL-MLA-CS-00-DR-A-00-11000	1:200	A1
Rev	Note	Rev.
PL3	Revised planning	PL3
PL2	Revised planning	
PL1		

EDK	TW	16/07/2021
EDK	TW	06/04/2021
EDK	TW	28/08/2020
Drwn	Chkd	Date

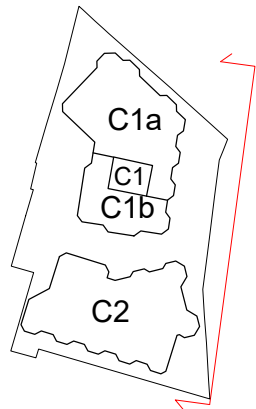


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- Notes:
1. These drawings are issued for planning approval only - detailed coordination with technical consultant including structural, services and fire engineers is ongoing
 2. All areas stated are NIA/NSA unless noted otherwise and are for planning purposes only - they are approximate and may change during later design stages
 3. All heights stated are for planning purposes only - they may change during later design stages and material amendments will be notified as necessary
 4. Landscaping is shown indicatively only - for details of proposed public realm and landscaping refer to landscape architect's drawings
 5. Surrounding context in plan is based on OS map data dated 7/1/20



Elevation key

1. Brickwork Type 1 – Light mix of 'Vandersanden Sevan' and 'Vandersanden Garda' brick with light coloured mortar
2. Brickwork Type 2 – White brick stripes
3. Brickwork Type 3 – Dark 'Hagemeister Liverpool' brick with dark coloured mortar
4. Concrete clis / copings / entrance canopies – architectural quality concrete with white / portland finish
5. Windows – PPC aluminium / colour light bronze
6. Balustrades – PPC steel / colour light bronze
7. Bespoke patterned grilles / screen - PPC aluminium or steel / colour light bronze
8. Pergola / roof structure - PPC steel / colour light bronze

PL2 Revised planning
PL1

EDK TW 06/04/2021
EDK TW 28/08/2020

Drwn Chkd Date

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Proj. No. 508 Project 100 Church street Client HPJ 11 Developments Ltd

Sheet Name CS GA elevation - East Status Planning

CDE ID ENFL-MLA-CS-00-DR-A-00-12001 Scale 1:200 Size A1 Rev. PL2



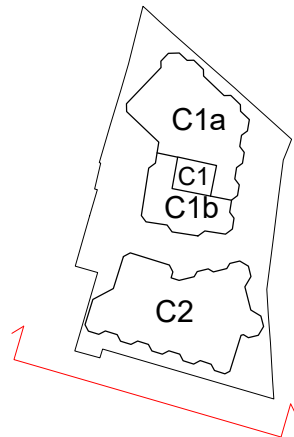
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PL2 Revised planning
PL1

EDK TW 06/04/2021
EDK TW 28/08/2020

Drwn Chkd Date

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Proj. No. 508 Project 100 Church street Client HPJ 11 Developments Ltd

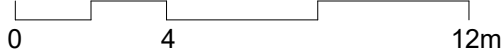
Sheet Name CS GA elevation - South Status Planning

CDE ID ENFL-MLA-CS-00-DR-A-00-12002 Scale 1:200 Size A1 Rev. PL2



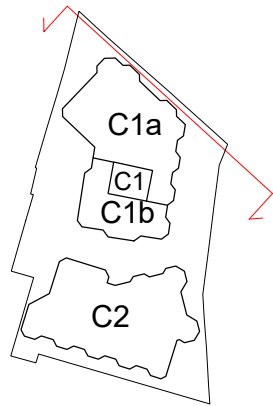
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PL2 Revised planning
PL1

EDK TW 06/04/2021
EDK TW 28/08/2020

Drwn Chkd Date

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Proj. No. 508 Project 100 Church street Client HPJ 11 Developments Ltd

Sheet Name CS GA elevation - North Status Planning

CDE ID ENFL-MLA-CS-00-DR-A-00-12000 Scale 1:200 Size A1 Rev. PL2

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 4 January 2022

Report of

Head of Planning
- Vincent Lacovara

Contact Officer:

Andy Higham
Gideon Whittingham
Allison Russell

Ward:

Southgate Green

Ref: 20/03448/FUL

Category: Full Application

LOCATION: Coppice Wood Lodge, 10 Grove Road, Southgate, N11 1LX

PROPOSAL: Redevelopment of site involving demolition of existing buildings to provide 45 residential units together with associated parking and landscaping.

Applicant Name & Address:

Newlon Housing Trust

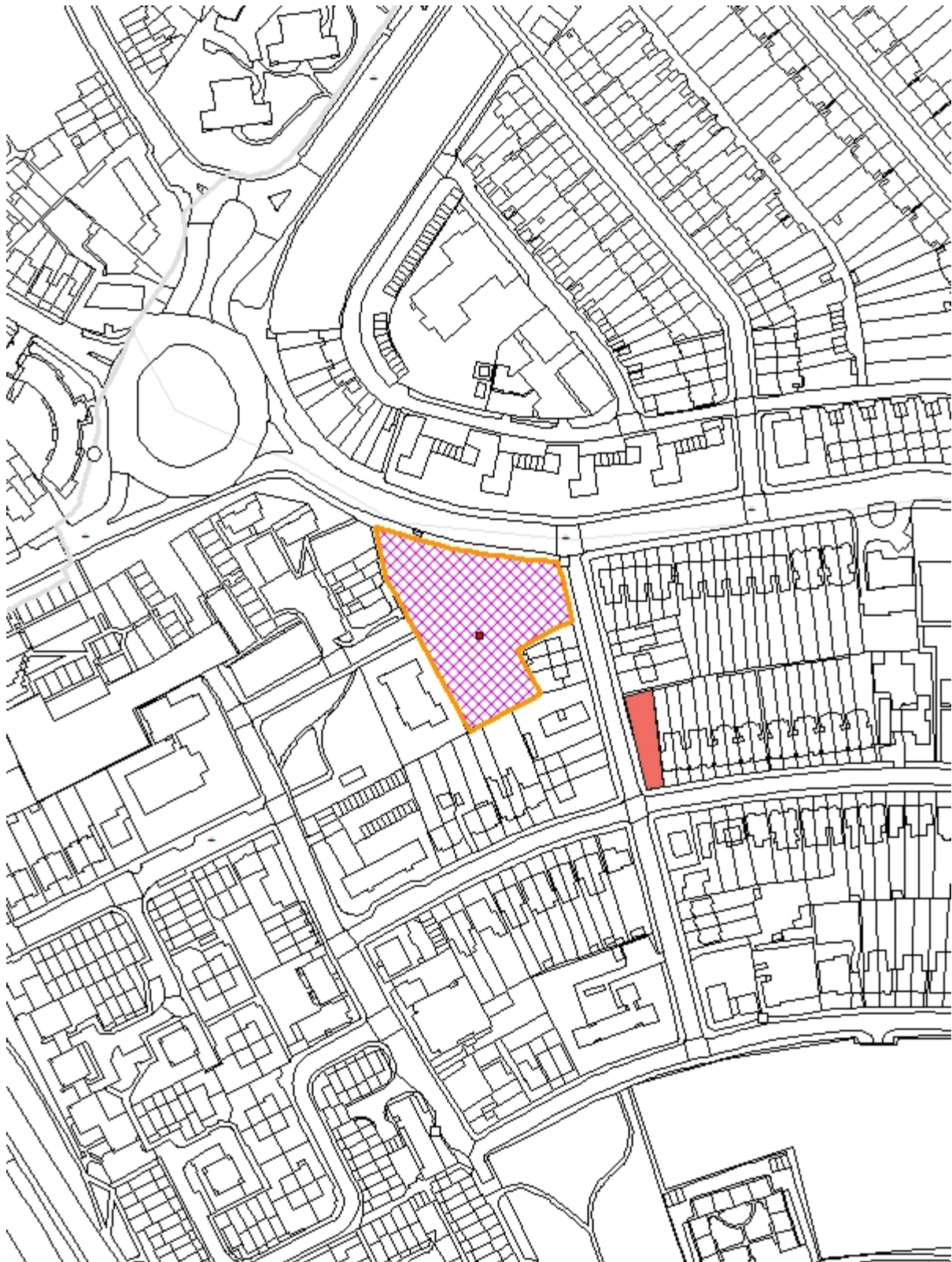
Agent Name & Address:

Mr James Leuenberger
Montagu Evans LLP
70 St Mary Axe
London
EC3A 8BE

RECOMMENDATION:

1. That subject to the finalisation of a S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions.
2. That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

Ref: 20/03448/FUL LOCATION: Coppice Wood Lodge , 10 Grove Road, Southgate, N11 1LX



1. Note for Members

- 1.1 This planning application is categorised as a “major” planning application and in accordance with the scheme of delegation, is reported to Planning Committee for determination.

2. Executive Summary

- 2.1 The application proposes a high-quality part four/part five storey residential development on existing underutilised, highly sustainable brownfield land which sits within a long-established predominantly, residential area.
- 2.2 There is a pressing need for housing, including affordable housing, and Enfield has a challenging 10-year housing delivery target. The Applicant Newlon Housing Trust, is a dedicated social housing provider who are seeking to bring forward a proposal for 40 affordable units to be constructed and managed by them. In total, 45 residential units are proposed resulting in a residential development delivering 89% affordable housing. Of the 40 affordable units, 12 would be affordable rent (30% of the affordable housing provision)) and 28 would be shared ownership (70% of the affordable housing provision). The remaining five units would be 3b5p townhouses and proposed for market sale, to support the viability of the scheme
- 2.3 The proposed development is considered to be a well-designed scheme which is sympathetic to the character and appearance of the area as well as the amenities of neighbouring properties. This is supported by a detailed landscaping schemes including the re-provision of trees where appropriate. In addition, the Arnos Grove Heat Network is located some 250 metres from the site and would provide a sustainable solution to providing heat and energy on the site, thus contributing to the Council’s targets for carbon reduction.
- 2.4 The primary public benefits of the scheme can be summarised as follows:
- Optimising the site – making effective use of a highly sustainable, highly accessible, brownfield site;
 - Housing – making a significant contribution to the Borough’s housing delivery, Including a level of affordable housing significantly in excess of the policy requirement.
 - Social and economic benefits - providing jobs during construction and increasing footfall to the local shopping centres to the three local centres within the close proximity to the site.
 - Landscape and biodiversity enhancements – including preservation of healthy protected trees and introduction of suitable replacement trees.
 - Minimising Green House Gas Emissions and exceeding London Plan minimum energy reduction target baselines; and
 - An improvement in on-site sustainable urban drainage (water management).
- 2.5 Furthermore, it has been recognised that:
- The development by virtue of its size, location and proximity would not unacceptably harm the amenity of occupying and neighbouring residents.
 - The proposals would not cause any unacceptable harm to highway safety or the flow of traffic in the locality.

- The development would add vitality and vibrancy to the site by virtue of the re-introduction of residents living life on the site and bringing activity to this presently, dormant, prominent site.

2.6 The development would be appropriate and broadly in accordance with the Development Plan (Adopted London Plan 2021, Core Strategy and Development Management policies) and relevant the National Planning Policy Framework (NPPF) policies.

3. Recommendation / Conditions

3.1 That subject to the finalisation of a S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions:

1. Time limit - Full
2. Development in accordance with approved drawings and documents
3. Housing mix
4. Accessible housing
5. Materials – including samples and 1-1 mock-ups on site
6. Surfacing materials – including samples
7. Details of all structures and plant on roofs – including detailed drawings and views
- 8 Details of all means of enclosure - site boundary and within site: terraces and balconies
9. Secured by Design
10. Removal of householder permitted development
11. Removal of permitted development for additional floors
12. Contamination Report
13. Contamination remediation strategy
14. Unidentified contamination
16. Non-road mobile machinery
18. Construction Management Plan
19. Fire strategy
20. Detailed tree Protection scheme including auditable schedule of Arboricultural supervision/ inspection
21. Detailed Landscaping proposals including UGF
22. Landscaping management plan
23. Trees and utility plan
24. Replacement tree planting
23. Play areas not to be removed without written approval
23. Details of external lighting
24. Vegetation clearance outside of Bird nesting season
25. Works to stop if evidence of bat identified
26. Ecological enhancements
27. Green roof – details
28. Energy – compliance with strategy
29. Energy performance certificates?
30. Mechanical ventilation system details
31. Provision of blue badge parking and retention for use by private motor vehicles
32. EV charging – one space
33. Construction traffic logistics plan
34. Noise – development to be built in accordance with mitigation in noise report

- 35. Visitor cycle parking – 4 spaces
- 36. Cycle door widths – minimum 1.2m opening
- 37. Delivery and service plan
- 38. SUDs - strategy
- 39. SUDs - verification report
- 40. Water efficiency
- 41. Thames Water - construction within 5m of assets
- 42. Piling Method statement - in relation to sewerage infrastructure
- 43. Levels

Informatives

- 1. In aiming to satisfy Secured By Design the applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.
- 2. Thames Water has advised of underground assets within 15 metres of the site
- 3.2 That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the S106 obligations and the recommended conditions as set out in this report.

4. Site and Surroundings

- 4.1 The site is located within Southgate Green Ward on the western edge of the Borough close its boundary with the London Borough of Barnet.
- 4.2 This part of the Borough is predominately residential in character, consisting of both flatted and terraced units. Properties adjacent to the site consist of a mixture of period and modern buildings. Further, there are a variety of building types in the immediate surroundings. Old Church Court is located to the west of the site and is a former church which has been converted to residential units. Two storey housing is located adjacent on Cross Road whilst the residential development on the opposite side of Bowes Road is predominantly four storeys. In terms of architecture, a range of styles and ages of buildings can be found with most buildings containing brick and / or render facade
- 4.3 The site is an irregularly shaped parcel of land which extends to approximately 0.38Ha with direct access from Grove Road, and located to the south of Bowes Road and the east of Cross Road.
- 4.4 Coppice Wood Lodge Care Home formerly provided residential care on the site. It was built and operated by the Council. In 2016, the site was sold to Newlon Housing Trust. The buildings were deemed to be in a poor condition, requiring substantial refurbishment, thus making them redundant. As a result, the former care home comprises a redundant four storey brick unit to the centre, south and east of the site, and a single storey unit to the north with an associated hard surface car park to the east.
- 4.5 There are no heritage assets on or adjacent to the site. It is not within a conservation area and there are no listed buildings on or within the immediate vicinity of the site. However, along the north and north east boundaries of the site, as well as on the south eastern part of the site, there are trees protected by tree preservation orders.

- 4.6 The site is well connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 6a ('excellent'). The site is within walking distance of Arnos Grove Underground station and New Southgate railway stations. Several bus routes operate along Bowes Road (A1110), providing travel into Hertfordshire and Central London.

5.0 Proposal

- 5.1 The proposal is for the redevelopment of site involving demolition of existing buildings to provide 45 residential units arranged over four and five storeys. Included in the proposal is associated parking, children's play area/community space and landscaping.
- 5.2 The proposed development represents an attractive medium sized residential scheme comprising a mix of tenures including affordable homes for rent, shared ownership and five market sale townhouses. Affordable housing would equate to 89% of the total by unit. This equates to 40 affordable units of which 12 would be affordable rent (30% of the affordable housing provision and 27% of the total number of units) and 28 would be shared ownership (70% of the affordable housing provision and 62% of the total number of units).
- 5.3 There are 13 parking spaces proposed. Five spaces would be allocated for disabled users, 5 spaces would be allocated to the family townhouse and 3 spaces would be available for the remainder. In addition, Newlon Housing has agreed to a car club, this and the allocation of the three bays for occupants, would be secured via a Section 106 agreement.
- 5.4 Cycle parking is proposed in the form of 84 spaces for long stay (secure and covered double stacker system) and 2no spaces for short stay in the form of Sheffield stands. What is proposed exceeds the 74 spaces required for a development of this size.
- 5.5 Arnos Grove Heat Network is located close to the site and it will be able to provide the development's energy needs in a sustainable way. Connection is to be secured via a Section 106 agreement.
- 5.6 Newlon Housing Trust sought to be respectful of the tree coverage on site, recognising both the aesthetic appeal and environmental contribution trees make, Consequently, the design has taken account of existing trees especially those protected by a tree preservation order. Not all the trees are healthy and where this is confirmed, they will be removed and replaced by healthy specimens (see paragraphs 9.157-165).

5.7 Proposed Housing Mix

Unit Type	Affordable Rent	Shared Ownership	Private	Total Units	Total Habitable Rooms
1 bed 2 person	4	14	0	18	36
2 bed 3 person	2	7	0	9	27
2 bed 4 person	0	7	0	7	21
3 bed 5 person	6	0	5	11	55
Total	12	28	5	45	139

- 5.8 Broken down by tenure, the development would provide:

Unit Type	Affordable Rent (Habitable Rooms)	Shared Ownership (Habitable Rooms)	Total (Habitable Rooms)	% of Family Units
1 bed 2 person	8	10	18	26
2 bed 3 person	6	0	6	9
2 bed 4 person	0	15	15	22
3 bed 5 person	30	0	30	43
Total (Habitable Rooms)	44	25	69	
Proposed Tenure Split (%)	64	36	100	

- 5.9 Five of the proposed flatted development units would be wheelchair accessible/adaptable. All five wheelchair units would be located on ground floor. Four of these units would be allocated for affordable rent and one for shared ownership. Two of the units would be three bedroom, two would be 2 bedroom and one would be a single bedroom flat. The range of unit sizes is welcomed as it offers options for a wide spectrum of residents from single persons to families.
- 5.10 All units have been designed to comply with Approved Document Part M4(2) & M4(3).
- 5.11 Each residential unit will have access to a private balcony or terrace. Dedicated amenity space of 155 sqm would be immediately adjacent to the residential block. This would comprise of dedicated play space for children and a community zone. Informal amenity space would be situated on the edge of the proposed development to the rear. Taking into account all amenity space, the proposal would provide playable space of some 455sqm.
- 5.12 The new homes are proposed to meet or exceed Nationally Described Space Standards and all new homes are proposed to meet building regulations Part M4(2) standards and the London Plan.
- 5.13 The scheme was subject to pre-application discussion and engagement. Pre-application engagement included meetings with Council Officers, stakeholder engagement and public consultation. The proposals have evolved during the course of these discussions and negotiations with the applicants in response to officer comments. A Statement of Community Involvement (SCI) has been submitted as part of the application to demonstrate how the applicants have engaged with the local community.

6.0 Relevant Planning Decisions

- 6.1 19/02650/SO: Environmental Impact Assessment Screening Opinion Request under Part 2, Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to demolition of the existing buildings on the site, cessation of its specialised housing use and the redevelopment of the site for a residential-led scheme. Environmental Impact Assessment Not Required. Date of decision 13.08.2019.
- 6.2 19/03406/FUL: Redevelopment of site involving demolition of existing buildings to provide 54 Residential units comprising 49 self-contained flats (20 x 1 bed, 22 x 2 bed and 7x 3 bed within part2-part 7 storey block with balconies and 5 x 3 bed single family dwellings with associated parking and landscaping. Withdrawn 25.02.2020
- 6.3 Three pre-applications, over the past four to five years, have been undertaken for the redevelopment of the site for residential use. The principle has always been accepted

and the proposal under consideration has evolved as result of those discussions and pre application engagement with Newlon Housing Trust

Neighbouring Site

6.4 21/03150/FUL: Church Hall Grove Road London N11 1LX

Redevelopment of site involving demolition of church hall and construction of a part 5 and part 6 storey apartment building to provide 28 self-contained units with associated external works. Under consideration.

7.0. Consultation

Pre Application Engagement

7.1 Newlon Housing Trust held a public consultation event on the evening of 22 May 2019, which was prior to the submission of the initial application (ref: 19/03406/FUL) that was subsequently withdrawn. The event was held in Coppice Wood Lodge. Representatives from Newlon Housing Trust, planning consultants Montagu Evans and MEPK Architects were in attendance. Presentation boards were displayed, and attendees were invited to leave comments on the forms or via the email address provided.

7.2 At the event 16 persons confirmed their attendance by entering their names and addresses on a register. It is estimated that another 10 persons attended but did not write in the register.

7.3 Following comments received at the public consultation event, the following revisions were incorporated into the proposed development:

- To preserve privacy to No.6 Cross Road windows have been omitted from the adjacent elevation.
- Security of neighbouring properties improved by specification of high boundary fences.

Public Consultation

7.4 Initial consultation on the application involved notification letters being sent to 331 neighbouring properties on 08.12.2020 providing people with 24 days to respond. A press notice was published in the Enfield Independent on 16.12.2020 and three site notices were also erected at the site on 16.12.2020. Three representations were received.

7.5 All three representations raised concerns to the proposal. The following objections (as summarised) were made in response to the application:

- Development too high
- Inadequate parking provision
- Increase in traffic
- Loss of parking
- Inadequate public transport provision
- Increase danger of flooding
- Close to neighbouring properties
- Cumulative impact on existing residents and infrastructure in general
- Conflict with local plan

- Loss of light
- Loss of privacy
- More open space needed on development
- Noise nuisance
- Out of keeping with character of the area
- Over development
- Strain on existing community facilities
- Loss of views
- Significant short-term disruption and impact on the quality of life for local

Statutory and non-statutory consultees

Environmental Health:

- 7.6 Environmental Health does not object to the application for planning permission as there is unlikely to be a negative environmental impact. Conditions in relation to provision of a construction management plan, contamination and non-road mobile machinery have been recommended.

SuDS:

- 7.7 No objection is raised subject to conditions relating the submission of a Sustainable Drainage Strategy and subsequent Verification Report demonstrating that the approved drainage / SuDS measures have been fully implemented

Traffic and Transportation:

- 7.8 No objection is raised in principle and the proposed development makes appropriate provision for access and parking having regard to Policies DMD 8, DMD 45 and DMD 47 of the Development Management Plan 2014 and London Plan 2021 Policy T6 . However, conditions are necessary for drainage and electric charging. In addition, the site is in a CPZ and it is expected the developer will enter a S106 to prevent permit ownership by residents.
- 7.9 It is noted that the developer is committed to either providing a car club bay or providing membership to an existing local one. The details of this proposal should be secured in the S106. If no new bay is considered feasible by the car club operators, membership for use of an existing local bay will be required
- 7.9 A car management plan to control allocation of vehicle car parking spaces would be required via a S106. Based on the Traffic & Transportation Sustainable Transport Calculator, the total required from this site is £50k.

Tree Officer:

- 7.10 Given the importance of trees on this site, the Tree Officer has been actively involved in this application. Following site visits, meetings with Newlon's tree specialist and revisions to the proposal to safeguard trees, there is no objection to the proposal subject to the submission of a utility plan and details of replacement species.

Energetik:

- 7.11 Discussions have been held between the applicant and the Council's District Heat Network (DHN) setup company 'Energetik'. Agreement has been reached, which would ensure that the proposal would connect to Arnos Grove Heat Network. Arnos

Grove Heat Network will be supplied with waste heat from 2026 at a near zero carbon content. This would form part of the S106 legal agreement

Designing Out Crime Officer:

- 7.12 No objection subject to the development obtaining a Secured By Design compliance certificate.

Thames Water:

- 7.13 No objection subject to informative requesting the developer to engage with Thames Water in order to protect their assets.

8. Relevant Policy

- 8.1 Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions of the development of the development plan so far as material to the application: and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.

National Planning Policy Framework 2021

- 8.2 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.

- 8.3 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.

- 8.4 In relation to achieving appropriate densities paragraph 124 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.

- 8.5 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.

Housing Delivery Test / Presumption in Favour of Sustainable Development:

- 8.6 The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:
- “(c) approving development proposals that accord with an up-to date development plan without delay; or
 - (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:
 - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (7); or
 - (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.7 Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”
- 8.8 The Council's recent housing delivery has been below our housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and more recently being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.
- 8.9 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.10 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan

period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.”

- 8.11 In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 Enfield met 77% of the 2,394 homes target for the three-year period delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target and we now fall into the “presumption in favour of sustainable development” category.
- 8.12 This is referred to as the “tilted balance” and the National Planning Policy Framework (NPPF) states (see paragraph 8.6 above) that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

The London Plan 2021

- 8.13 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:

- GG1 – Building Strong and Inclusive Communities
- GG2 – Making the Best Use of Land
- GG3 – Creating a Healthy City
- GG4 – Delivering the Homes Londoners Need
- D3 – Optimising Site Capacity through the Design-Led Approach
- D4 – Delivering Good Design
- D5 – Inclusive Design
- D6 – Housing Quality and Standards
- D7 – Accessible Housing
- D8 – Public Realm
- D11 – Safety, Security and Resilience to Emergency
- D12 – Fire Safety
- D14 – Noise
- H4 – Delivering Affordable Housing
- H5 – Threshold Approach to Applications
- H6 – Affordable Housing Tenure
- H10 – Housing Size Mix
- HC1 – Heritage Conservation and Growth
- S4 – Play and Informal Recreation
- E6 – Locally Significant Industrial Sites
- HC1 – Heritage Conservation and Growth
- G1 – Green Infrastructure

- G5 – Urban Greening
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- S2 – Health and social care facilities
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions
- SI4 – Managing Heat Risk
- SI5 – Water 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
- T6.1 – Residential Parking
- T7 – Deliveries, Servicing and Construction
- T9 – Funding Transport Infrastructure through Planning

Local Plan - Overview

- 8.14 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, they form the statutory development plan for the Borough. Enfield's Local Plan sets out planning policies to steer development where they align with the NPPF and the London Plan 2021. Whilst many of the policies do align with the NPPF and the London Plan, 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.

Core Strategy

- 8.15 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.

- CP2: Housing supply and locations for new homes
- CP3: Affordable housing
- CP4: Housing quality
- CP5: Housing types
- CP7: Health and Social Care Facilities and the Wider Determinants of Health
- CP9: Supporting community cohesion
- CP13: Promoting economic prosperity
- CP16: Taking part in economic success and improving skills
- CP18: Delivering shopping provision across Enfield
- CP20: Sustainable energy use and energy infrastructure
- CP21: Delivering sustainable water supply, drainage and sewerage infrastructure
- CP22: Delivering sustainable waste management

CP24:	The road network
CP25:	Pedestrians and cyclists
CP26:	Public transport
CP28:	Managing flood risk through development
CP30:	Maintaining and improving the quality of the built and open environment
CP31:	Built and landscape heritage
CP32:	Pollution
CP36:	Biodiversity
CP45:	New Southgate
CP46:	Infrastructure contributions

Development Management Document

8.16 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.

8.17 The following local plan Development Management Document policies are considered particularly relevant:

DMD1	Affordable Housing on Sites Capable of Providing 10 Units or more
DMD3	Providing a Mix of Different Sized Homes
DMD4	Loss of Existing Residential Units
DMD6	Residential Character
DMD8	General Standards for New Residential Development
DMD9	Amenity Space
DMD10	Distancing
DMD17	Protection of Community Facilities
DMD22	Loss of Employment Outside of Designated Areas
DMD37	Achieving High Quality Design-Led Development
DMD38	Design Process
DMD45	Parking Standards
DMD47	New Roads, Access and Servicing
DMD48	Transport Assessments
DMD49	Sustainable Design and Construction Statements
DMD50	Environmental Assessment Methods
DMD51	Energy Efficiency Standards
DMD53	Low and Zero Carbon Technology
DMD54	Allowable Solutions
DMD55	Use of Roof Space / Vertical Surfaces
DMD56	Heating and Cooling
DMD57	Responsible Sourcing of Materials
DMD58	Water Efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD65	Air Quality
DMD68	Noise
DMD69	Light Pollution
DMD70	Water Quality
DMD72	Open Space Provision
DMD73	Children's Play Space
DMD78	Nature Conservation
DMD79	Ecological Enhancements

DMD81 Landscaping

8.18 Other Material Considerations

National Planning Practice Guidance
 Mayoral Supplementary Planning Guidance
 LBE S106 SPD
 Local Housing Needs Assessment 2020
 Community Infrastructure Levy Regulations
 Technical housing standards – nationally described space standard 2015
 Blue and Green Strategy June 2021
 New Southgate Masterplan 2011

Enfield Local Plan (Reg 18) 2021

- 8.19 Enfield Local Plan - Reg 18 Preferred Approach was approved for consultation on 9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. It is Enfield's Emerging Local Plan.
- 8.20 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan, while noting that account needs to be taken of emerging policies and draft site proposals.
- 8.21 Key local emerging policies from the plan are listed below:

Policy DM SE2 – Sustainable design and construction
 Policy DM SE4 – Reducing energy demand
 Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
 Policy DM SE7 – Climate change adaptation and managing heat risk
 Policy DM SE8 – Managing flood risk
 Policy DM SE10 – Sustainable drainage systems
 Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
 Policy DM BG8 – Urban greening and biophilic principles
 Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
 Policy DM DE2 – Design process and design review panel
 Policy DM DE7 – Creating liveable, inclusive and quality public realm
 Policy DM DE10: Conserving and enhancing heritage assets
 Policy DM DE11 – Landscape design
 Policy DM DE13 – Housing standards and design
 Policy DM H2 – Affordable housing
 Policy DM H3 – Housing mix and type
 Policy DM T2 – Making active travel the natural choice
 Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

9. **Analysis**

- 9.1 The main planning issues to consider are as follows:

- Principle of Development
- Housing Provision and Mix
- Residential Quality and Amenity

- Neighbouring Amenity
- Transport, Access and Parking
- Landscape, Play, Biodiversity and Trees
- Sustainability and Climate Change
- Flood Risk and Drainage
- Socio-economics and Health
- S106
- Community Infrastructure Levy

Principle of Development

- 9.2 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. Furthermore, paragraph 11 (c) of the National Planning Policy Framework (NPPF) goes on to state that development proposals that accord with the development plan should be approved without delay.
- 9.3 The Development Plan includes local policies (Core Strategy / Development Management Plan) as well as the London Plan (2021). The London Plan policies will have greater weight where there is inconsistency with local policy given its more recent adoption in March 2021. The NPPF is an important and weighty material consideration.
- 9.4 Running alongside this is the aim that planning decisions should facilitate sustainable development, and this is at the heart of the NPPF which advocates a presumption in favour of sustainable development. The NPPF at paragraph 120 also advocates the promotion and support for 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.
- 9.5 Such an approach to maximise the efficient use of land, is consistent with the adopted London Plan which states at Para 1.2.2 of the London Plan
- “The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.”*
- 9.6 Para 1.1.4 of the London Plan also states:
- “Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspaces in accessible locations, built forms that work with local heritage and identity, and social, physical and environmental infrastructure that meets London’s diverse needs is essential if London is to maintain and develop strong and inclusive communities”.*
- 9.7 These strategic planning ambitions are captured in Policies GG1 (Building Strong & Inclusive Communities), GG2 (Making the best use of Land) , GG3 (Creating a Healthy City) and GG4 (Delivering the Homes Londoners Need) with the proposal needing to be viewed in this policy context.

- 9.8 Making the more efficient use of land is presently of significance due to the identified need for housing as a consequence of the Housing Delivery Test which has triggered the “tilted balance” and the presumption in favour (NPPF). For decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan.
- 9.9 Enfield Housing’s Trajectory Report 2019 shows that during the preceding 7 years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield’s 2019 Housing Action Plan recognises that the construction of more high-quality homes is a clear priority, with only 51% of approvals over the preceding 3-years actually being implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government’s standard methodology.
- 9.10. The Council’s Local Plan Issues & Options (Regulation 18) document (2021) acknowledges the sheer scale of the growth challenge for the Council and the focus for development in locations with good access to local infrastructure and public transport. The Council’s Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the Borough.
- 9.11. Enfield is a celebrated green borough with close to 40% of the land currently designated as 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. These land designations underpin the need to optimise development on brownfield land. Paragraph 1.2.5 of the London Plan notes that
‘all 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’.
- 9.12 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.
- 9.13 The application site constitutes brownfield land with a very good public transport accessibility level (PTAL) of 6a and therefore the principle of developing the site for housing to support the Borough’s challenging housing delivery target is strongly supported in principle.

Redevelopment

- 9.14 The scheme proposes the redevelopment of the site, which currently comprises a vacant, purpose built former local authority care home together with car parking spaces. Newlon Housing Trust acquired the site from the Council in 2016 following the care home being deemed unfit for the intended use. The existing buildings are circa 1960/70s and whilst they are of their time, their contribution to the built environment is considered to be neutral. There is, therefore, no objection to its replacement.
- 9.15 The site is identified within the New Southgate Masterplan 2010 as being a “poor quality building” The purpose of the New Southgate Masterplan 2010 is to improve the lives of residents, including creating better places for our residents to live. One of

the objectives of the New Southgate Masterplan 2010 is to provide better housing, which this proposal seeks to do.

Residential Use

- 9.16 Given the site is located at the within a long-established residential area with good public transport links, access to local amenities, recreation and leisure uses, it is considered that a wholly residential scheme is considered appropriate in this instance.

Loss of Community Facility

- 9.17 Policy DMD 17 states that the Council will protect existing community facilities in the borough.

Proposals involving the loss of community facilities will not be permitted unless:

- a. A suitable replacement facility is provided to cater for the local community that maintains the same level of public provision and accessibility; or
 - b. Evidence is submitted to demonstrate that there is no demand for the existing use or any alternative community use.
- 9.18 In this instance, it has been confirmed that the care of patients with dementia which the Coppice Wood Lodge facility catered for, was re-provided in more suitable accommodation across the Borough at the time the property was declared as surplus to requirements and sold to the applicant.

Summary of Principle

- 9.19 Given the above considerations, the principle of development is considered to be acceptable in principle terms subject to other detailed considerations as discussed below.

Housing Need, Delivery and Mix

- 9.20 The current London Plan sets a target for the provision of 52,287 new homes each year. In addition, the London Plan 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. 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.
- 9.21 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 ambitious adopted London Plan targets.
- 9.22 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, the rise in private sector rents in proportion to the average salary and the significant rise in homelessness was highlighted. Enfield had one of the highest numbers of homeless households in the country often due to the insecurity and unaffordability of private sector housing which 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.

- 9.23 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 in February 2020 and its evidence, data and metrics are considered relevant material considerations.
- 9.24 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy GG1, GG2, GG3 & GG4 of the London Plan seeks to promote the provision of quality new homes and for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 9.25 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 evolve.
- 9.26 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. Coppice Wood Lodge is an example of such a site.

Housing and Tenure Mix

- 9.27 Core Policy 5 of the Core Strategy, supported by Policy DMD3, seeks to achieve a Boroughwide target over the whole plan period as outlined below:
- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses (5-6 persons), 20% 4 bed houses (6+ persons)
 - Social Rented Housing – 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons), 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons)
- 9.28 Core Policy 5 also outlines that the Council will seek a range of housing types in the intermediate sector, and that the mix of intermediate housing sizes will be determined on a site by site basis.
- 9.29 It should also be noted that the evidence base to support Core Policy 5 dates from 2008. The emerging draft Local Plan for Enfield uses a more up to date evidence base; the Local Housing Needs Assessment 2020. This has informed emerging Policy H3. The table below is an extract from Policy H3, which outlines priority types for different sized units across different tenure:

	Studio/bedsit	One-bedroom	Two-bedrooms	Three-bedrooms	Four-bedrooms or more
Social/affordable rented	Low priority	Medium priority	High priority	High priority	Low priority
Intermediate	Low priority	High priority	High priority	Medium priority	Low priority
Market	Low priority	Low priority	Medium priority	High priority	High priority

- 9.30 The Council's Local Housing Needs Assessment (LNHA) 2020, regarding affordable housing need, outlines that 41.1 per cent of new affordable homes should have three bedrooms. This is based on type and size requirements of affordable housings linked to housing register evidence. It also outlines, as is reiterated within text supporting emerging Policy H3, that the focus of affordable ownership provision (shared equity/intermediate products) should be on one and two-bedroom units, as the majority of households who live in intermediate (shared ownership) housing are households without children.
- 9.31 The Council's LHNA (2020) also outlines that 14.7% of those currently on the Council's waiting list need one-bed homes, 35.3% need two-bed homes, 42.3% need three-bed homes and 7.7% need four-bed homes.
- 9.32 It must also be recognised that the more recently adopted London Plan Policy H6 (Affordable Housing Tenure) seeks a minimum of 30% low cost homes (either London Affordable Rent (LAR) or Social Rent), a minimum of 30% intermediate products, with the remaining 40% to be determined by the Borough based on identified need. Core Policy 3 of the Core Strategy outlines that the Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision but needs to be viewed in the context of London Plan Policy H6.
- 9.33 In this particular case, the applicant is a registered Housing Trust, proposing 40 affordable units out of a total of 45, equating to 89% of all units. Completing the proposal would be five family sized homes. Of the 40 affordable units of which 12 would be affordable rent (30% of the affordable housing provision) and 28 would be shared ownership (70% of the affordable housing provision).
- 9.34 Newlon Housing Trust works closely with the Council's Housing Development Team. The proposed development has been discussed with the Housing Development Team and considered to be acceptable. The additional 18 shared ownership units is welcomed by the Council's Housing Development Team.
- 9.35 With this affordable housing provision, 24% of units are proposed to be large family units (3 bed 5 person) on a per unit basis, and on a habitable room basis, this equates to 40% of units. For completeness, the affordable housing offer is 82% on a habitable room basis. The unit split, as submitted in the Application, is shown in **Table 1** below:

Table 1: Proposed Housing Mix (as submitted)

Unit Type	Affordable Rent	Shared Ownership	Private	Total Units	Total Habitable Rooms
1 bed 2 person	4	14	0	18	36
2 bed 3 person	2	7	0	9	27
2 bed 4 person	0	7	0	7	21
3 bed 5 person	6	0	5	11	55
Total	12	28	5	45	139

- 9.36 The proposed affordable housing offer of 89% per unit / 82% by habitable room, does mean compromise in the split between social rent and intermediate. However, it should be borne in mind that 27% of the total number of units are social rent and 62% Intermediate. Alternative scenarios have been considered and if the total number of affordable units was reduced the housing tenure could be 64% affordable rent and 36% shared ownership. However, the overall number of affordable units would fall to 50% with an increase in properties for market sale.
- 9.37 While this mix would be more broadly compliant with the Council's Interim Affordable Housing Policy which seeks an affordable housing mix of a 70/30 split in favour of rented accommodation, and in accordance with the London Plan 2021, weight has been to prioritise the quantum of affordable housing responding to the need for homes across all tenures.
- 9.38 In assessing 50% of the 89% affordable housing proposed Newlon Housing has demonstrated that the tenure split of the affordable housing offer is acceptable. It should also be noted that the affordable rent product is London Affordable Rent (LAR) in accordance with the Council's preferences in this regard and should therefore be viewed favourably and weighed in the planning balance.
- 9.39 When viewed in the round with the additional units that bring the total affordable housing offer to 89% affordable housing by unit, or 82% by habitable room, the Proposed Development not only aligns with the policy requirements for 50% of the provision, but then it could be argued provides further affordable housing in addition to the policy requirements. In effect the Proposed Development as submitted provides an additional 18 shared ownership units above the policy requirement to bring the overall offer to a level which should be given substantive weight.
- 9.40 In terms of housing mix, 68% of the affordable rented dwellings are provided as 3 bed homes which is 8% in excess of Core Policy 5 when combining 3 and 4 bed requirements but also accords with local need as recognised by the Council's Strategic Housing Market Assessment for this location. In particular the provision of 38% of total units as family sized units significantly exceeds the 14% recommended by the SHMA. Therefore, the proposed development would deliver much needed affordable accommodation to meet need, but the additional shared ownership and market units would help younger people move into the area and establish a firm footing on the housing ladder and the scheme delivers a mix of unit sizes across all tenure types but particularly family sized affordable rented homes which should weigh heavily in the planning balance.

Housing and Tenure Mix Conclusions

- 9.41 As set out, Core Policy 5 should not be applied or relied on in isolation, being a Borough wide target over the plan period especially when there is more recent adopted policy in the form of the London Plan and there is a need to respond to the

conclusions of the Housing Delivery test which results in the application of the tilted balance to the assessment of residential schemes and the presumptions in favour of approving such schemes which is considerable in the absence of matters which would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Whilst emerging policy holds limited weight, it is nevertheless based on the most up to date evidence base and represents the most recent local needs assessment regards housing mix and tenure.

- 9.42 Taking all matters into consideration, it is considered the scheme, offering 89% affordable housing at this location, is of significant benefit to the Borough.
- 9.43 Newlon Housing is a development partner of the Council's dedicated to providing people in housing need with decent and affordable homes. Actively operating in North and East London Newlon, has a wealth of experience in identifying and meeting local housing needs.
- 9.44 It is considered that the proposed housing mix and tenure is acceptable and will greatly assist a range of residents find much needed homes. The proposed development would provide a balanced mix of housing to ensure the site is being optimised whilst delivering high quality homes to meet identified local housing needs.
- 9.45 The unit/tenure mixes would be secured through a s106 Agreement should planning permission be granted.

Design

- 9.46 The proposed development site is does not contain any listed buildings or structures nor is it is adjacent to any listed buildings or structures. Similarly, the site is not within or adjacent to any of the borough's conservation areas. As such, there are no issues to consider in respect of heritage assets.

Design – Character and Appearance

- 9.47 The development would involve the demolition of the existing care home complex and erection of a high quality, contemporary part 4/part five storey residential block wrapping around Bowes Road and Cross Road.
- 9.48 The proposal has evolved through discussions with officers and as a consequence of site constraints, the proposed height was reduced resulting in a loss of units. This was regrettable in terms of housing numbers; however, it was necessary to ensure a scheme that was appropriate for this site and demonstrates Newlon Housing Trust's commitment to delivery good quality developments.
- 9.49 From Bowes Road the site is defined by a substantial screen of trees. This proposal preserves this frontage. Additional new trees are incorporated throughout the site with areas landscaped to enhance the public realm. The proposal includes a central communal green space.
- 9.50 The massing of the flatted building block would be between 4 and 5 storeys in height. Building heights have largely been dictated by the proposed layout of the and also through consideration of the surrounding context and neighbouring buildings. The taller elements of the scheme would be located towards the north, at the corner position of Bowes Road and Cross Road. It is considered that this location would have the least amount of impact on the surrounding and proposed buildings. A benefit of this approach is that the development would enjoy a prominent position

and revitalise this redundant site. The flatted block would house all of the proposed flats.

- 9.51 The proposed flatted block would maximise south, east and west facing balconies. This has been achieved through the varied orientation of the blocks. There would not be any solely north facing balconies or external spaces nor would there are any single aspect dwellings.
- 9.52 The proposed flatted block is of a simple yet attractive design with flat roof design, partial set back upper floor and features such as vertical, portrait shaped windows and recessed layers of brickwork. Two double height entrances on the Bowes Road (principal elevation) would introduce activity along this frontage, as well as presenting a grand entrance to the flatted block. Proportionally, the flatted block is well designed and would sit comfortably within this corner site.
- 9.53 With regards to materiality, the development would be finished predominately in brick work. To add interest, different styles and colours of brick would be used in the construction. The five townhouses would be finished in brickwork at ground level with standing seam zinc cladding to the upper storeys and roof.
- 9.54 Completing and complementing the proposed development is the proposed erection of five, three storey, terraced houses on the lower lying south eastern area of the site. Each townhouse would be set in its own private garden ground with one off-street car parking space.
- 9.55 Cycle parking and bin storage would be internally situated at the rear of the ground floor
- 9.56 The design also demonstrates high quality architectural detailing and materials resulting in an acceptable appearance. The proposal responds to the topography of the site and its constraints. As a result, it is considered the built form, height and design development would satisfactorily integrate into the street scene having regard to the requirements of the London Plan and DMD policy.

Conclusion of Heritage and Design

- 9.57 There are no heritage implications for the proposed development. The proposed development is considered to be of high quality in terms of its, bulk, massing, design, architectural detailing and use of materials.

Residential Quality and Amenity

- 9.58 London Policy D6 sets out the London Plan criteria to ensure the delivery of new housing of an adequate standard. Although the adopted London Plan 2021 will take precedence where there is a conflict, the Housing Supplementary Planning Guidance Document (2016) remains an adopted document and a material consideration in decision making. The DMD contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing).

Internal Floorspace Standards

- 9.59 Policy D6 of the London Plan sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces. All of the proposed residential units will either meet or exceed the minimum required floorspace standards. In addition, all single and double bedrooms

comply with the minimum required space standards (7.5 sqm for single bedrooms and 11.5 sqm for double bedrooms). Minimum floor to ceiling heights for all proposed homes will be 2.5m in compliance with the guidance.

- 9.60 London Plan Policy D7 requires at least 10% of new dwellings to constitute Building Regulations M4(3) wheelchair user dwellings. Of the proposed dwellings five have been designed to meet this standard which equates to 11% of the new dwellings.

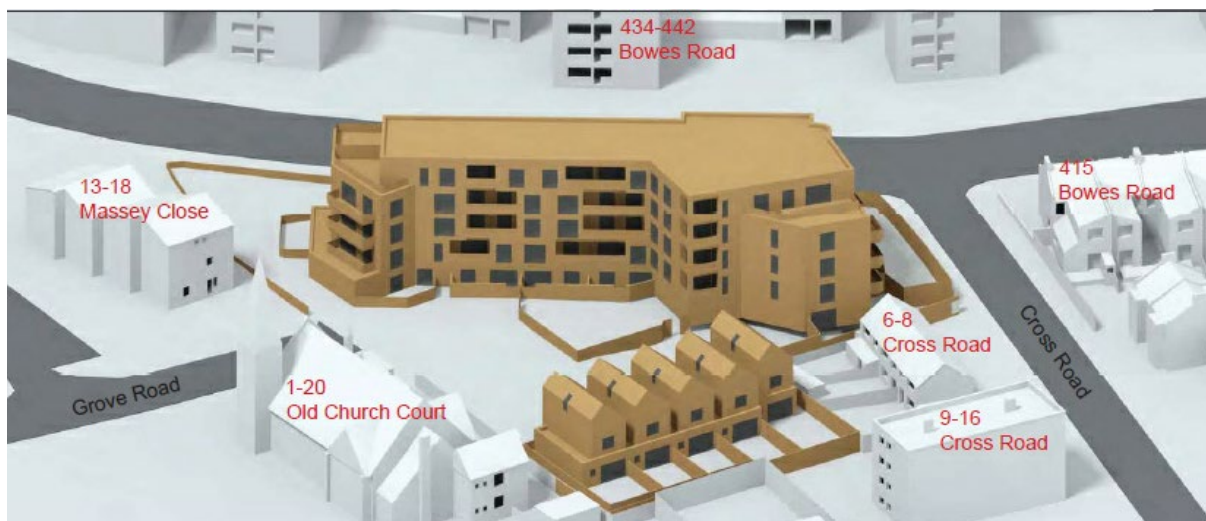
Daylight and Sunlight

- 9.61 London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. It states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. North facing single aspect units should be avoided.
- 9.62 Buildings should be designed to maximise the number of dual-aspect dwellings and in this case, all proposed units are dual aspect.
- 9.63 In support of the development, the applicant has commissioned a daylight and sunlight assessment (dated 15 October) report upon the daylight and sunlight aspects of this Planning Application in relation to the neighbouring residential properties and the proposed accommodation.
- 9.64 The daylight and sunlight assessment confirmed that daylight to the neighbouring buildings would satisfy BRE's criteria to all but one room. In addition, sunlight to neighbouring buildings would fully satisfy BRE's criteria.
- 9.65 The daylight within the proposed townhouses would fully satisfy BRE's criteria and the daylight within the apartment block would broadly satisfy BRE's criteria with an overall pass rate of 94%. Sunlight availability would vary in response to aspect; however, the proposed layouts satisfy London Plan 2021.
- 9.66 Overshadowing to the neighbouring gardens would remain BRE compliant. Many of the proposed amenity areas would pass on 21st March and all of these areas would pass on 21st June amounting to a good outcome. Therefore, the level of amenity for neighbouring residents and the minimal adverse impact of the development in terms sunlight and daylight is considered to be satisfactory and in accordance with the development plan.

Overlooking

- 9.67 Located within an established residential area, the site is bounded on all boundaries by flatted residential blocks, a converted church and two storey housing. Massey Court is located to the west of the proposed flatted block with gardens abutting the application site. Along the mutual boundary between the two sites are large mature trees, which are to be retained.
- 9.68 To reduce any impact on Massey Court, the proposed flatted block has been designed to be four storeys. A roof terrace is proposed on the set back fifth floor, which would align with the edge of the lower floor.
- 9.69 Massey Court rear garden area is not particularly deep at 5 metres at its closest point to the application site. Having regard for the quality of amenity for all our residents, it is important to consider how the proposed building would relate to Massey Court. It

is proposed that windows and balconies on the western side would be orientated in such a way to minimise overlooking, as can be seen in the image below. A crude outline of the proposed balcony area is annotated on the image, which shows the balcony facing towards Grove Road. Trees would provide a natural visual barrier between both residential blocks.



- 9.70 Representations from two residents on Cross Road, to the east of the site, raised concerns relating to overlooking. A terraced residential block is located to the south east of the proposed flatted block and it is understandable that concerns have been raised due to the proposed proximity of the flatted block. This has however been

considered and the south east wall closest to the terraced block would contain one window with the balconies moved to the east elevation.

- 9.71 Clearly the proposal would result in a significant change to the site, including the presence of a larger building form, however, the proposed building has been designed to maximise potential whilst respecting those currently residing around it. The relationships are considered to be acceptable in terms of safeguarding residential amenity

Internal communal space

- 9.72 The entrances to the buildings would be level and the communal corridors would have a rational and efficient arrangement with the use of an elevator and stair cores to service the flats.

Amenity Space Provision

- 9.73 Policy D6 of the London Plan and Policy DMD9 provide the standards for the level of private amenity space provision for each unit and is primarily based upon the number of rooms and occupancy level. The standards represent the absolute minimum, although regard must also be given to the character of the area. All of the units will provide private amenity space in the form of terraces or balconies in compliance with policy DMD9.
- 9.74 Play facilities are fully integrated into the design of the Communal Zones, and are classified as Doorstep Playable Space (space where children can run or play informally) within GLA guidelines. They offer simple space for play as well as some items of equipment aimed at 0-4 year olds. Communal amenity space is also proposed in the form of landscaped areas for leisure and children's play including a communal roof terrace.
- 9.75 The proposed playable area meets the projected need for 232sqm based on 23 children. Total playable area identified 455sqm – of which 95sqm is 'formal' (i.e. safety surface, equipment and seating) and a further 60sqm has playable features. A landscaped space including engaging play features for young children, and places for carers to sit and talk.
- 9.76 Views into rear areas where the children's play area would be located together with amenity spaces, would be overlooked by the properties within the development which would provide passive surveillance and create a feeling of security.
- 9.77 Uplighting of trees and street furniture and lighting key pedestrian routes would provide an attractive and safe night-time environment
- 9.78 On balance and having regard to the other benefits of the scheme, the proposal is considered acceptable in this regard. Conditions are recommended to require the submission of details of the type and arrangement of play equipment to be provided across the site

Fire Safety

- 9.79 London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire

Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.

- 9.80 This application was submitted prior to this London Plan requirement and no fire strategy is required to be submitted. has been agreed, however, that the assessment of the Fire Statement can be included as pre-commencement condition.

Secure by Design

- 9.81 The Designing Out Crime Officer has advised that they are supportive of the development in principle. A condition is to be imposed to ensure that the development complies with SBD principles.

Neighbour Amenity

- 9.82 London Plan Policy D6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. 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 and Sunlight

- 9.83 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.

- 9.84 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". However, 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..."

- 9.85 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.
- 9.86 A 'Daylight & Sunlight' 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:

- 434-442 Bowes Road
- 415 Bowes Road

- 6-8 Cross Road
- 9-16 Cross Road
- 1-20 Old Church Court
- 13-18 Massey Close
- Proposed development (internal)

- 9.87 The submitted report has been drafted by daylight/sunlight specialists with reference to the Building Research Establishment (BRE) publication (2011), "Site Layout Planning for Daylight and Sunlight. A Guide to Good Practice" and local planning policy.
- 9.88 According to the report, the study confirmed that daylight to the neighbouring buildings would satisfy BRE's criteria to all but one room. In addition, sunlight to neighbouring buildings would fully satisfy BRE's criteria.
- 9.89 The daylight within the proposed Town Houses would fully satisfy BRE's criteria and the daylight within the apartment block would broadly satisfy BRE's criteria with an overall pass rate of 94%. Sunlight availability would vary in response to aspect, but the proposed layouts satisfy The London Plan recommendations.
- 9.90 Overshadowing to the neighbouring gardens would remain BRE compliant. Many of the proposed amenity areas would pass on 21st March and all of these areas would pass on 21st June amounting to a good outcome.
- 9.91 Overall, it is considered that the proposed scheme has been designed to respond to BRE's criteria, the relevant policy within Enfield's Local Plan and The London Plan and would not have an unacceptably adverse impact on neighbouring residential occupiers in terms of loss of light or outlook.

Noise and Disturbance

- 9.92 Guidance relevant for the assessment of noise affecting new developments is given in the National Planning Policy Framework (NPPF). Paragraph 185 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'.
- 9.93 Meanwhile Policy D14 of the London Plan 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 any 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, the London Plan 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.

- 9.94 An acoustic report was submitted following communication with the Council's Environmental Health Department. The report records the results of the noise survey, conducted to establish the exposure of the site to environmental noise, and guidance on the sound insulation requirements of the building envelope. Bowes Road traffic was identified as main source of noise.
- 9.95 Design performance standards for envelope elements have been recommended to ensure the building envelope can control external noise levels to the recommended internal criteria. External noise levels to the rear of the site will be within recommended BS 8233:2014 guidelines for gardens/amenity spaces.
- 9.96 Provided these mitigation measures are incorporated into the design of the development, the application complies with Local and National planning policy with regards to noise. These mitigation measures can be secured via planning condition.
- 9.97 The proposed residential development is consistent with the existing prevailing use in the area and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the proposal. Furthermore, in terms of general disturbance, the previous use of the site was as a care home with car parking and this forms a base line. The current proposal is for a purely residential development with very limited car parking. The pattern of people's movements will perhaps change, with comings and goings likely to be more spread out throughout the day, but it is unlikely to generate more general disturbance than the former care home use. The removal of the majority of car parking from the site is likely to reduce general disturbance for nearby residential occupiers.

Light Pollution

- 9.98 It is recognised that that there is the potential for some level of light pollution arising from the development as the building is larger and taller than that previously on site. However, it is not considered light generating from the flats would be unreasonable given they are expected to be used in a normal residential fashion. A planning condition is recommended that details of any external lighting are provided by condition to ensure that this will be acceptable in relation to existing neighbouring residents and future occupiers of the development.

Conclusion of Neighbouring Amenity Considerations

- 9.99 Having regard to the above, the proposed development is, on balance, considered acceptable in relation to the impact on neighbouring residential amenity in line with relevant policies DMD 8, 37 & 68, CS Policy 4 and London Plan Policies D4, D6 and D14. It recommended that a condition be attached pertaining to external lighting is attached to ensure that an acceptable level of residential amenity is maintained.

Transport, Access and Parking

- 9.100 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards. Policies T6 and T6.1 to T6.5 set out car parking standards. Policy DMD 45 makes clear that the Council aims to minimise car parking and to promote sustainable transport options.

Vehicle Parking

London Plan 2021 Standards

NEW PLAN							
		PTAL DEPENDENT		Requirement			
Unit type	No.	Lower Max	Upper Max	Lower Max	Upper Max	Provision	Ratio
1xbed	18	0	13.5	11	33.75	13	0.29
2xbed	16	0	12				
3xbed	11	11	8.25				
4xbed	0	0	0				
TOTAL	45	11	33.75				

- 9.101 The provision of 13xspaces is two above the lower limit of 11
- 9.102 The excellent PTAL of 6 means the lower limit is applicable in this case, and provision of 13 spaces is acceptable.
- 9.103 The site is in a CPZ and it is expected the developer will enter a S106 to prevent permit owners
- 9.104 The Transport Assessment also refers to the how spaces will be allocated, which will only be to properties with occupants who own a vehicle. This arrangement should be formalised and included in the S106, via a "Car Park Management Plan membership by residents

Vehicle Parking Layout

- 9.105 The layout is acceptable and swept path is included for the refuse access.
- 9.106 All the bays meet the required minimum dimensions, including disabled bays which have the 0.60m width to the side.

Electric Vehicle Parking

- 9.107 Plan Policy T6.1(C) requires that at least 20% of new parking spaces should have active charging facilities, with passive provision for all remaining spaces.
- 9.108 In this instance, three of the bays would be active electric and the remainder passive electric. This is acceptable, however, the detail should still be secured with a condition

Vehicular Access

- 9.109 Access is existing and remains acceptable.

Pedestrian Access

- 9.110 New pedestrian accesses are provided through the site linking through to Bowes Road, improving the permeability through the site.

Servicing

- 9.111 The site can be serviced from the proposed car park. Refuse vehicle tracking is providing and confirms vehicles can access and turn.
- 9.112 Delivery and service vehicles can access and egress in the same way.

Cycle Parking

- 9.113 Policy T5 of the London Plan sets out cycle parking requirements.
- 9.114 Cycle parking requirements for the site is shown below:

18x1-bed – 18xspaces
 16x2-bed – 32xspaces
 11x3-bed – 22xspaces
 TOTAL = 72xspaces long stay, + 2xspaces short stay

- 9.115 The proposals show 84xspaces for long stay (secure and covered double stacker system) and 2xspaces for short stay in the form of Sheffield stands. This is an acceptable provision and should be secured with the suggested condition to ensure it is implemented as proposed.

9.116 Traffic Generation

Traffic generation from vehicles will be controlled by the CPZ. Whilst the site will have a trip demand, which is included in the TA, the CPZ will self-enforce against trips as occupants and visitors will not be able to park in the local area or impact on local junctions.

Pedestrian and cycle trips will increase however, and these should be suitably mitigated (see below).

Sustainable Transport

- 9.117 Based on the Traffic and Transportation Sustainable Transport Calculator, the total required from this site is £50k. This will be a contribution to mitigate against car trips and promote sustainable transportation trips to and from the site. It is based on the scale of the development and the considered impact of the increase in the cycle and ped trips resulting from the site. Areas of expenditure will include:

- Car club membership and Oyster card provision
- Cycle lane infrastructure
- SUDS
- Controlled & uncontrolled crossings informal crossings
- Pedestrian dropped kerbs
- Planters
- Traffic orders, waiting restrictions, signage
- Street trees, School Streets
- CPZ Exclusion
- Travel Plan surveys
- Parking Management Plan

Construction Traffic

- 9.118 As with all new developments of the size and scale, a Construction Management, Quality & Environmental Plan will be required and can be secured by an appropriate condition.

Refuse and Recycling

- 9.119 Two secure, appropriately sized internal refuse and recycling stores are to be provided within the flatted block, close to communal entrances at the rear. In curtilage refuse and recycling would be the method for the townhouses.
- 9.120 Refuse will be collected within the site with a refuse vehicle able to get within acceptable collection distances of all entrances. Vehicle tracking has been provided to ensure that a refuse vehicle can manoeuvre acceptably within the site.

Conclusion on Transport, Access and Parking

- 9.121 Overall the proposed approach to access, parking and servicing is acceptable. This is subject to the mitigation measures outlined, which will be secured within a S106 Agreement, and appropriate conditions being attached to the permission.

Play, Landscape, Biodiversity and Trees

- 9.122 Chapter 8 of the London Plan – Green Infrastructure and the Natural Environment, has a number of policies setting out the London Plan's position on various matters ranging from the delivery of green infrastructure to the requirements for new development, in their impacts to biodiversity, approach to drainage and open space and landscaping offer.
- 9.123 Policy G5 outlines that major development proposals should contribute to the greening of London by including urban greening by incorporating measures such as high-quality landscaping, green roofs, green walls and nature based sustainable drainage. Although of very limited weight, the draft Local Plan for Enfield Policy BG8 also outlines that new development will need to demonstrate how it will exceed the urban green factor targets set out in the London Plan. Policy G5 outlines that the Mayor recommends a target score of 0.4 for developments that are predominantly residential.
- 9.124 Policy G6 of the London Plan seeks to ensure development proposals manage impacts on biodiversity and aims to secure net biodiversity gain while Policy G7 outlines that wherever possible, existing trees of value are retained and where trees are proposed to be removed, there should be an adequate replacement. Furthermore, Policy S4, also of the London Plan, outlines that development proposals for schemes that are likely to be used by children and young people should, for residential development, incorporate good-quality accessible play provision for all ages. It outlines that at least 10sqm of play space should be provided per child. In addition, in 2019 the GLA introduced an updated play calculator against which applications should be assessed.
- 9.125 Core Strategy Policy 34 and 36 and Policies 71, 72, 73, 78, 79 and 80 of the Development Management Document sets out the Council's positions regarding the protection and enhancement of open space, children's play space, ecological enhancements and the treatment of trees on development sites.

- 9.126 The Council has also adopted its Blue and Green Strategy (June 2021), which sets out how the Borough's open spaces, habitats, landscapes and water assets will be protected, maintained, enhanced and expanded over the next ten years.

Play

- 9.127 As outlined under 'Amenity Space Provision' above, the proposed development includes a variety of well-considered outdoor amenity space that would include a children's play area, community space for residents to sit outdoors and play space around the perimeter of the site.

Regard has been had to equipment, materials, layout and lighting to create pleasant outdoor space for residents to enjoy recreational and social space.

Landscaping

- 9.128 An illustrative landscape masterplan has been submitted which sets out the site wide approach to soft and hard landscaping as well as identifies tree planting locations and where existing trees are to be removed or retained.
- 9.129 The proposed built forms wrap around and generate a central focus for the development. This houses a communal green space and children's play area and benefits from its sunny, south-facing aspect. The proposed town houses would be provided with private south-facing gardens
- 9.130 Landscape proposals are themed around 'coppice woodland' - the ancient form of woodland management from which Coppice Wood Lodge takes its name. New planting will include characteristic multi-stemmed trees, such as native cherry, and birch trees supplemented with an attractive informal 'woodland' ground flora of bluebells, primroses, campions, ferns and grasses.
- 9.131 The planting design would establish interest with positive benefits to local wildlife and biodiversity. The play area is marked by strong shapes with play features targeting preschool- age children. These would also incorporate a wooden theme with stepping posts and mounds set within a circular social seating area for residents to sit and children to play. The location is over-looked and all landscape designs would be audited to ensure safety and security within an accessible environment for people of all ages and abilities.
- 9.132 The tree and shrub planting strategy would create a series of sheltered and welcoming spaces. Environmental benefits of trees and groundcover planting include shade and shelter for people and habitat to encourage wildlife.
- 9.133 The front (northern boundary) is generally planted with shade tolerant species to offer a planted threshold and privacy to the ground floor units. Gentle undulations of lawn would provide open aspect for informal residential play.
- 9.134 The Community Zone would include tall shrub planting and multi-stemmed trees to provide structure and enclosure to the play area. The planting character is described as 'woodland floor' with plants selected for dappled shade and robust visual interest throughout the year. Bulbs that create an interest during spring, ferns and other shade loving plants. Planting becomes more intimate and lower, with large areas of lawn where several activities can take place.

- 9.135 The sunnier seated areas on the southern side of the communal zone are given emphasis by the introduction of flowering and aromatic planting – with emphasis on year-round succession of colour, fragrances, and nectar sources for insects
- 9.136 Having regard to Urban Greening (Policy G5 of the London Plan), it is considered that this can be included as part of the detailed landscaping strategy to ensure the landscaping proposals provide the required benefits. A score of 0.4 will normally be accepted for new residential developments.

Biodiversity

- 9.137 Policy G6 of the London Plan states that development proposals should support the protection and conservation of priority species and habitats and promote opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context. Core Policy 36 of the Core Strategy confirms that all developments should be seeking to protect, restore, and enhance sites. 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.
- 9.138 This application is supported by an Ecological Impact Assessment which has assessed the existing biodiversity value of the site, the potential impacts of the development on biodiversity, mitigation measures and recommended ecological enhancements.
- 9.139 In relation to ecology, the majority of the site is of low ecological value. It comprises of hardstanding and buildings, with some species poor amenity grassland in the eastern part of the site. The existing trees on-site and off-site (but close to the boundaries) provide a habitat of moderate ecological value, which has the potential for seasonal use by breeding birds and for use by roosting/foraging bats.

Bats

- 9.140 All species of bat and their habitats are fully protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside Rights of Way Act 2000), and by the Conservation of Habitats and Species Regulations 2010, which consolidates all the various amendments made to the Conservation (Natural Habitats, &c.) Regulations 1994 in respect of England and Wales.
- 9.141 The 1994 Regulations transposed Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into national law. The legislation makes it illegal under the Wildlife and Countryside Act 1981 (as amended) to:
- Intentionally or recklessly kill, injure or take a wild bat;
 - Be in possession or control of any live or dead wild bat, or any part of, or anything derived from a wild bat;
 - Intentionally or recklessly damage, destroy or obstruct access to any place that a wild bat uses for shelter or protection; and
 - Intentionally or recklessly disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection.
- 9.142 Bats are also European Protected Species (EPS). As such under the Conservation of Habitats and Species Regulations 2010 it is an offence to:
- Deliberately capture, injure or kill any wild animal of a European Protected Species;

- Deliberately disturb wild animals of any such species. Disturbance of animals includes in particular any disturbance which is likely to:

- i) impair their ability -

- to survive, to breed or reproduce, or to rear or nurture their young; or
- in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

- ii) to affect significantly the local distribution or abundance of the species to which they belong;

- Deliberately take or destroy the eggs of such an animal; or
- Deliberately damage or destroy a breeding site or resting place of such an animal.

9.143 Greengage Environmental Ltd was commissioned by Newlon Housing Trust to undertake a Bat Survey of a site known as Coppice Wood Lodge, New Southgate in the London Borough of Enfield. The survey was undertaken to determine the presence or likely absence of roosting bat, and to assess levels of bat foraging or commuting activity across the wider site.

9.144 A Preliminary Ecological Appraisal (PEA) undertaken by Greengage in 2017 identified the building as having 'low' potential to support roosting bats and accordingly a further survey was recommended.

9.145 Following ambiguous behaviour by a noctule, a precautionary soft strip of a small area of tiles on the building was recommended under the supervision of a licenced ecologist. During the first survey at noctule was observed close to the building and shortly after sunset. However due to the complex structure of the building it could not be confirmed as having emerged. Therefore, an additional dawn survey was undertaken as re-entry behaviour is more obvious to detect. No re-entry was observed during the dawn survey. Therefore, roosting bats were determined as likely-absent. As a precaution, it is recommended that a soft strip under an ecological watching brief is undertaken for the tiles where ambiguous behaviour was detected.

9.146 Moderate levels of commuting and foraging behaviour by common bat species were recorded at the site during the surveys. Activity of at least three species were observed.

9.147 With roosting bats confirmed as likely-absent, the development is predicted to have a negligible impact upon roosting bats. Any potential impacts upon foraging and commuting bats can be fully mitigated through implementation of the following recommendations:

- Bat-sensitive lighting incorporated into the scheme to minimise any potential impacts of increased lighting levels on foraging and commuting bats;
- Retention of trees, vegetation and habitats of value to local bat populations, where possible;

9.148 Enhancement measures could include wildlife-friendly landscaping to enhance the site as a foraging and commuting resource and inclusion of bat boxes on mature trees and/or bricks or 'habitats' integrated within the newly constructed building to provide bat roosting opportunities at the site.

9.149 Subject to the above recommendations being implemented, the development would result in an increase in biodiversity.

Breeding Birds

- 9.150 Breeding birds are protected under the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally or recklessly kill, injure or take any wild bird or take, damage or destroy its nest whilst it is in use or being built, or to take or destroy its eggs. In addition, some species of bird are listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), for which there are additional offences of disturbing these birds at their nests, or their dependent young.
- 9.151 Greengage was instructed to undertake an updated site walkover in July 2020 to reappraise conditions at site in relation to previous ecological surveys undertaken in 2017 and 2019. The walkover survey concluded that moderate value for nesting birds remains in the trees and shrubs across site. No nesting was observed on the building.
- 9.152 It has been recommended that clearance of vegetation and demolition is undertaken outside of breeding bird season (March-August inclusive) unless nesting/breeding birds are confirmed absent by a suitably qualified ecologist within 48 hours of scheduled works. Any active nests should be protected accordingly.
- 9.153 Proposals should provide compensatory bird nesting habitat through landscaping, alongside providing integrated nesting space for key species such as London Biodiversity Action Plan (BAP) species swift and house sparrow within buildings at site. Measures relating to habitat protection and creation could be described within an Ecological Management Plan (EMP) secured through planning condition.

Ecological Enhancements

- 9.154 The NPPF at paragraph 174 states that *“the planning system should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”*. Therefore, the following measures are recommended to improve the biodiversity value of the site:
- Living roofs – specifically to take the form of substrate-based biodiverse roofs seeded and plug planted with wildflower species on any suitable flat-roofed buildings. The incorporation of green roofs is encouraged by the London Plan and is in line with Enfield’s Development Management Document 11, which encourages green roofs to be installed where it is economically and physically feasible. The living roof should be supplemented with invertebrate enhancements such as log piles, sand piles, water trays, rope coils and stone piles;
 - Wildlife-friendly planting schemes, to include native berry-bearing species such as hawthorn, blackthorn (*Prunus spinosa*) and ivy (*Hedera helix*), to encourage invertebrates to the site. Berry-bearing ornamental species such as cherry (*Prunus* sp.) and apple (*Malus* sp.) will encourage breeding and over-wintering birds;
 - Provision of bird and bat boxes, inbuilt into the fabric of new buildings;

- In order to benefit stag beetles, the stumps of any felled trees should be left in place, where possible. The logs should be piled and partially buried among the remaining trees as stag beetle loggeries; and
- Gaps to be created in any fences to prevent habitat fragmentation for hedgehogs. Care should also be taken during vegetation clearance to ensure that hedgehogs are not impacted; if any are found these should be safely moved to an area where they will not be harmed.

Assuming any associated mitigation actions identified by the phase 2 bat surveys alongside the other recommendations listed above are followed, these enhancements would stand to result in net gains for biodiversity at a site level.

- 9.155 The identified ecological enhancements will be secured by condition.
- 9.156 Having regard to the above, the proposed development will not unduly impact upon the existing ecological value of the site but through measures proposed and to be secured by condition, will serve to enhance the value of the site in accordance with policy G6 of the London Plan, CP36 of the Core Strategy and policy DMD79 of the Development Management Document.

Trees

- 9.157 London Plan Policy G7 states that where development proposals result in the removal of trees, adequate replacement trees should be planted based on the existing value of the trees to be removed.
- 9.158 Clarification and discussions relating to trees have contributed to the delay in the processing of this application. However, the importance of the trees and the willingness of Newlon to ensure the best outcome justifies the delay.
- 9.159 Coppice Wood is recognisable thanks to the swathe of the trees edging the site boundary at Bowes Road. These trees are protected by a tree preservation and make a valuable contribution to the streetscape and environment. That said, not all of the trees are in prime condition and subsequently, some, regardless of this proposed development need to be removed.
- 9.160 A tree survey and Arboricultural impact assessments (AIA) have been prepared and reviewed by our own Tree Officer. We have now reached a position where our Tree Officer accepts all proposals subject to a condition. Our Tree Officer has advised that the utility layout appears acceptable on the provision that the existing connections are re-used and no new ones would be necessary. While this is sufficient to demonstrate feasibility at this stage, we will need assurance from the various statutory undertakers that this will be practically possible. This could form a pre-commencement condition.
- 9.161 In terms of the impact on the trees, a total of 54 individual trees and 1 hedge were identified as the subject of the AIA report. These comprise 12 'B' category individual trees, 38 'C' category individual trees, 3 'U' category individual trees and 1 'C' category hedge and were identified in accordance with section 4.5 and table 1 of BS3837:2012 'Trees in relation to design, demolition and construction – Recommendations' (see Appendix 1 of the report dated 11 August 2021).
- 9.162 Due to the presence of a protected tree in the south east corner, adjacent to the proposed location of the townhouses, the end terrace house to the east was shuffled forward.

- 9.163 Sixteen trees require to be removed and this has been accepted by our Tree Officer. Our Tree Officer was explicit at a meeting that 1 for 1 replacements would not be appropriate on this site. Instead, fewer and larger specimens would be more suited to the site. Species and location have not been agreed; therefore, it is imperative that a condition is attached. Newlon Housing is aware of this requirement and are supportive of this approach.
- 9.164 Protective barrier fencing will be required to protect all trees identified for retention in accordance with BS 5837:2012.
- 9.165 Provided precautions to protect the identified trees are specified and implemented through the measures included in this report, the development proposal will have negligible impact on the retained trees or their wider contribution to amenity and character.

Conclusion on Play, Landscape, Biodiversity and Trees

- 9.166 Access to nature and biodiversity contributes to mental health and wellbeing. With new development comes opportunity to enhance ecological value and create new habitats. The development site has been previously used for development and is predominantly covered in hard standing and is therefore considered brownfield.
- 9.167 The proposed development would introduce soft landscaping, suitable replacement trees and private amenity spaces which would provide opportunity for small scale planting. As such it is anticipated that the development will provide a benefit to ecological value and biodiversity.
- 9.168 Outdoor space for the development would help improve mental and physical well-being. Over and above the formal amenity spaces, there are areas within the site, which could be used for informal play and/or food growing for residents.

Sustainability and Climate Change

- 9.169 Paragraph 154 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. The London Plan and Enfield (Regulation 18) emerging Local 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.
- 9.170 London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan's requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme's performance.
- 9.171 London Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.

9.172 London Plan Policy SI 4 outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy. 9.182. NPPF Paragraph 157 outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.

9.173 An Energy Statement was provided at the time of submission. During the course of the assessment of the proposal, agreement was reached between Newlon Housing Trust and Energetik to connect to the Arnos Grove Heat Network. A revised Energy statement was submitted which:

1 – sets out the annualised baseline energy demand (kWhr) and CO2 levels (KgCO2) of the development built to 2013 Building Regulations.

2 - sets out the design measures and features that reduce the baseline emissions relative to the London Plan Hierarchy (be lean, be clean, be green)

3 - provides the impacts of the measures and features from [2] on the baseline energy demand and emissions [1]

4 - provides full details, including (but not limited to), of types of lighting, boiler specifications, Combined Heat and Power networks and plant technology, zero carbon technology including roof plans and PV specifications.

5 – outlines the methods to monitor and maintain the development to ensure the targets are achieved and met consistently Thereafter, the development shall be carried out and completed in accordance with the approved assessment.

9.174 The energy strategy for the proposed development scheme has been assessed using the Energy Hierarchy to demonstrate compliance with the London Borough of Enfield requirements for 100% CO2 reduction beyond Building Regulations Part L 2013.

9.175 An energy efficient scheme has been proposed that has reduced the CO2 emissions through passive design measures, increasing insulation in the building fabric to reduce heat loss, improved heating and lighting systems and controls. These measures have resulted in predicted CO2 emissions that are achieving Part L 2013 baseline requirement.

DEN (Decentralised Energy Network) Connection

9.176 In the London Plan Policy SI 2 Minimising greenhouse gas emissions, the Mayor states that major development should be net zero-carbon. If London is to achieve its objective of becoming a zero-carbon city by 2050, new development needs to meet the requirements of this policy. Development involving major refurbishment should also aim to meet this policy.

9.177 Policy SI 3 Energy infrastructure states that developments should connect to existing heat networks wherever feasible. This is a viable option for the proposal and connection to the Arnos Grove Heat Network is welcomed.

9.178 The units have all been based on the current building regulations, the process carried out was to take a sample house, then a flat on each floor, we then upgraded the

fabric first to improved U values and finally added solar PV to achieve the 66% reduction required.

9.179 To meet the 66% reduction in CO₂ emissions over the baseline a connection to the Amos Grove Heat Network has been proposed. Newlon Housing has agreed to connect to the Energetik Decentralised Energy Network (DEN) at Arnos Grove Heat Network, which is in close proximity to the site and would provide hot water and heating to the properties. Connection to the DENS can be secured by S106.

9.180 There is a shortfall of 18261kg of carbon. Over the 30 years would be:

$30 \times 18.261 = 547.83$ tonnes

$547.83 \times £95.00 = £52043.85$ (carbon offset payment)

Conclusion on Sustainability and Climate Change

9.181 The proposal has been designed to reduce CO₂ emissions via the design of the building fabric and services to maximise the energy efficiency and minimise the energy requirements.

Contamination

9.182 A contamination report has been submitted. This states that a site investigation will be required. In accordance with the advice of the environmental health officer, details to deal with the contamination of the site to avoid risk to health and the environment will be required by condition.

Flood Risk and Drainage

9.183 London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield runoff rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.

9.184 Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for major development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage Strategies and maximising the use of Sustainable Urban Drainage Systems (SuDS).

9.185 Flooding is not a known risk on this site. Classed as Flood Risk 1, the site is at low risk of flooding.

9.186 A preliminary SuDS strategy have been submitted with the application. The Council's SUDS Officer has agreed to condition the submission of a SuDS strategy to ensure that the proposed development is fully compliant with the Council's policy requirements. In this case, there is no objection to the imposition of a condition for a SuDS Strategy.

10. Socio-economics and Health

Socio-Economics

10.1 London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should

support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end use phases.

10.2. Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.

10.3 To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that s106 planning obligations secure the following:

- Local Labour (during demolition and construction phases):
 - Employment & Skills Strategy submitted and approved prior to commencement
 - All reasonable endeavours to secure 25% of workforce
 - Apprenticeships or trainees
 - Local goods and materials
- Employment & training:
 - Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets.
 - Training opportunities
 - Partnership working with local providers/programmes

10.4 Health

10.5 Policy GG3 Creating a healthy city of the London Plan seeks to improve Londoners' health and reduce health inequalities. Accompanying the application is a Health Impact Assessment (HIA) which considers the four themes of:

- > Theme 1: Healthy Housing – Includes an assessment of housing design, accessible housing, healthy living, and housing mix and type.
- > Theme 2: Active Travel – Includes an assessment of measures to promote walking and cycling, safety, connectivity, and minimising car use.
- > Theme 3: Healthy Environment – Includes an assessment of construction, air quality, noise, contaminated land, open space, play space, biodiversity, local food growing, flood risk and overheating.
- > Theme 4: Vibrant Neighbourhoods – Includes an assessment of healthcare services, education, access to social infrastructure, local employment and healthy workplaces, access to local food shops and public buildings and spaces.

10.6 As outlined under the various sections above, it is considered by officers that the proposed development at Coppice Wood Lodge would benefit from features in its design, and its location within Arnos Grove, that will be positive towards the health of the occupants as well as to local residents.

11. **Section 106 / Legal Agreement**

- 11.1 Having regard to the content above, it is recommended that should planning permission be granted, the following obligations / contributions should be sought and secured through a legal agreement.

Affordable Housing

- The securing of 40 units in total for on-site affordable housing provision with 4no x 1bed, 2no x 2bed and 6 x 3bed all provided as LAR; 14no x 1bed and 14no x 2bed provided as shared ownership

Transport and Highways

- A sustainable transport contribution (index linked) of £50,0000 (fifty thousand pounds) £50k. This will be a contribution to mitigate against car trips and promote sustainable transportation trips to and from the site.
- CPZ parking permits restricted for future residents
- Commitment to either providing a car club bay or providing membership to an existing local one. If no new bay is considered feasible by the car club operators, membership for use of an existing local bay will be required.
- Sustainable Transport Package:

Climate Change, Flooding and the Environment

- Connection to Arnos Grove Heat Network
- Carbon Offset Payment of £52,043.85.

Business Employment and Skills

- Local Labour (during demolition and construction phases):
 - Employment & Skills Strategy submitted and approved prior to commencement
 - All reasonable endeavours to secure 25% of workforce
 - Apprenticeships or trainees
 - Local goods and materials
- Employment & training:
 - Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets.
 - Training opportunities
 - Partnership working with local providers/programmes

Monitoring

- 5% monitoring fee

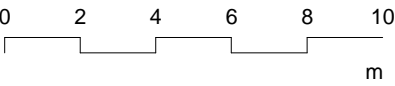
12. Community Infrastructure Levy (CIL)

- 12.1 Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure. The CIL contribution will be reported at the meeting.
- 12.2 The development of social housing is exempt from MCIL under the Planning Act. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

13. Conclusion

- 13.1 The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF, states that planning permission should be granted unless *“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”*.
- 13.2 Members will be aware of the need to deliver more housing including affordable housing in order to meet housing delivery targets. This proposed development would deliver a total of 45 homes including 40 affordable homes. Not only are these houses much needed, they would be of a high quality, set in pleasant surroundings and would provide a variety of housing options and importantly , 89% of the units would be classed as affordable. it is also recognised that there is a pressing need for housing, including affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. In this context the provision of 45 homes, including a policy compliant number of affordable homes, weighs heavily in favour of the development despite the acknowledged deficiencies with the proposal.
- 13.3 It is considered the application proposes a high-quality residential development on existing underutilised, highly sustainable brownfield land consistent with the objectives of adopted planning policy
- 13.4 In addition, as well as being energy efficient and sustainable, care has been given to ensure that the proposal would not harm the trees, which define this site. The site would be enhanced with suitable replacement trees, not only bringing visual benefits, but also helping us to improve our natural environment.
- 13.5 Well designed and spacious outdoor spaces would encourage social interaction amongst residents and stimulate child's play. These areas would benefit from natural surveillance from the flatted block and townhouses. Outdoor space is widely recognised for its many mental and physical health benefits.
- 13.6 With new development comes change and some disruption. Every care has been taken to minimise the impact on the surrounding properties. Whilst there will be change, it is considered that the proposal would not be detrimental to the amenity of neighbouring residents.
- 13.7 The applicant has engaged with the LPA in undertaking extensive pre-application advice The pre-application process involved the applicant considering design options to determine the most appropriate forms of development and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.

- 13.8 Overall and given weight to the need for development which provide new homes, it is concluded that the development for reasons set-out within this report, to broadly accord with the policies of the Development plan where they are material to the development and other relevant material planning considerations including emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule, and within the Section 106 Agreement, the application is recommended for approval.



Contextual north elevations
1 : 200



Contextual east elevation
1 : 200

D	25-03-21	Front elev. revised to reflect planning comments	LB	SC
C	22-03-21	Front elev. revised to reflect planning comments	LB	SC
B	05-10-20	Some openings adjusted to improve internal daylight / sunlight levels	LB	SC
A	25-09-20	Revised in response to comments received during planning app. consultation period	LB	SC

Issue	Date	Description	Drawn	Checked
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Planning
Coppice Wood Lodge, N11
Proposed contextual apartment elevations
North & east

Drawing number	Issue	Scale @ A1	Date	Drawn	Checked
1702 P-13	D	1 : 200	25.09.20	LB	SC

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North elevation
1 : 100

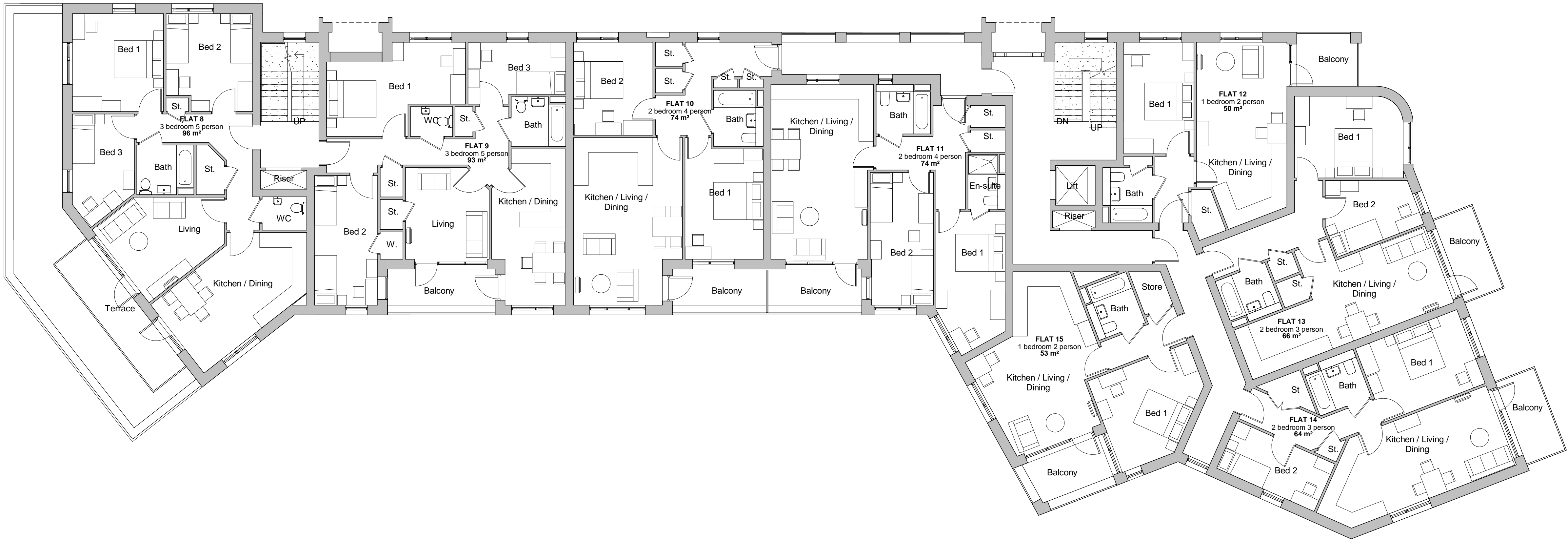
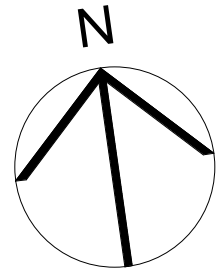
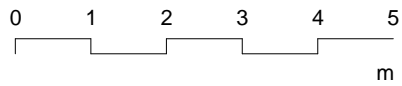


East elevation
1 : 100

Materials Schedule	
External walls	
•	Combination of chalky / buff multi stock brick & red / brown multi stock brick
•	Precast white stone to entrance frames (Bowes Road)
•	Dark grey aluminium glazed screen to entrances (Bowes Road)
Roofs	
•	Low pitched roof system
•	Green / sedum roofs where on plans
•	Concrete pavers to terraces
•	Dark grey aluminium downpipes
Windows and doors	
•	Dark grey composite aluminium windows and patio/ garden doors
•	Composite, PAS 24 security standard entrance doors
Balconies / Private Terraces	
•	Profile white stone facing to balcony deck
•	Dark grey powder coated aluminium balustrading
•	Structural glazed balustrading to upper floor set backs
•	Obscured glaze privacy screens between adjoining balconies

D	25-03-21	Front elev. revised to reflect planning comments	LB	SC
C	22-03-21	Front elev. revised to reflect planning comments	LB	SC
B	09-10-20	Some openings adjusted to improve internal daylight / sunlight levels	LB	SC
A	25-09-20	Revised in response to comments received during planning app. consultation period	LB	SC

rev	date	description	drawn	checked
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First floor
1 : 100

D	25-03-21	Front elev. revised to reflect planning comments	LB	SC
C	22-03-21	Front elev. revised to reflect planning comments	LB	SC
B	05-10-20	Some openings adjusted to improve internal daylight / sunlight levels	LB	SC
A	25-09-20	Revised in response to comments received during planning app. consultation period	LB	SC

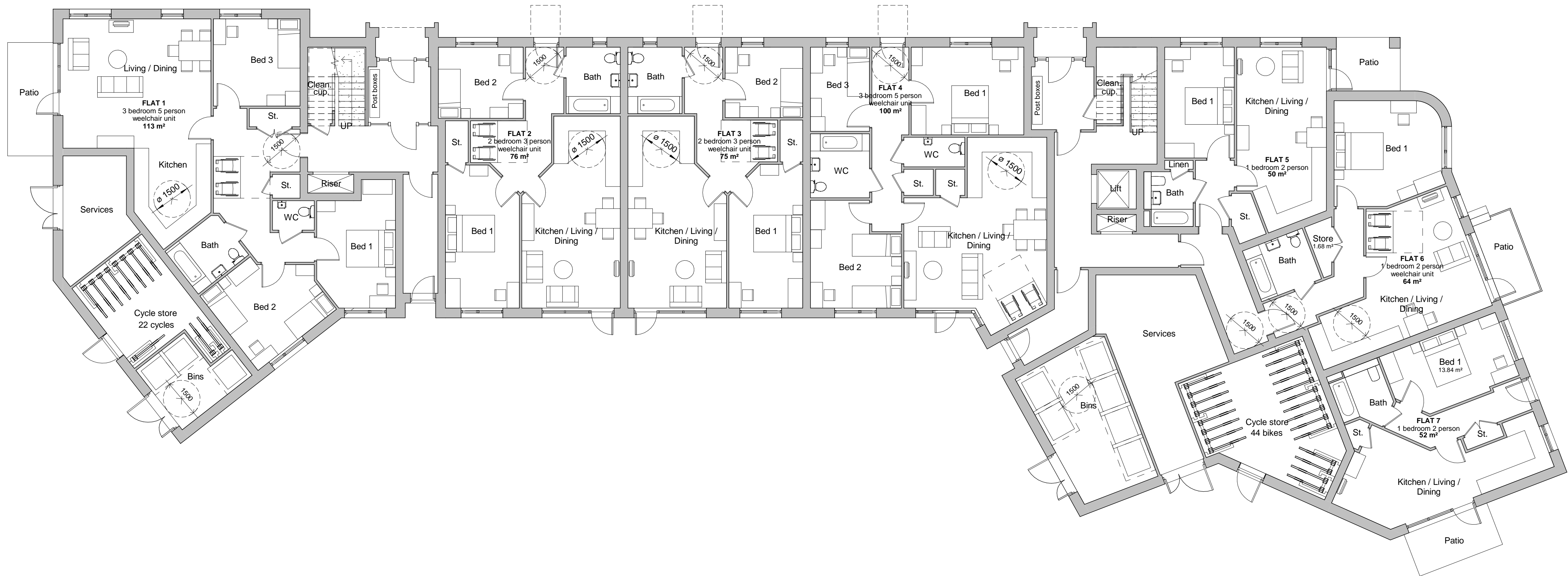
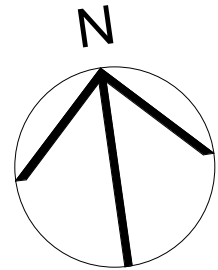
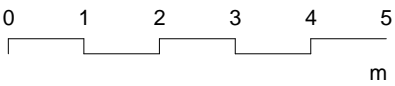
Issue	Date	Description	Drawn	Checked
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Preliminary for comment
Coppice Wood Lodge, N11
Apartment block
Proposed first floor plan

Drawing number	Issue	Scale @ A1	Date	Drawn	Checked
1702 P-03	D	1 : 100	29.07.19	JS	SC

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Ground floor plan

1 : 100

F	25-03-21	Front elev. revised to reflect planning comments	LB	SC
E	22-03-21	Front elev. revised to reflect planning comments	LB	SC
D	09-10-20	Additional cycle spaces provided to apartments	LB	SC
C	05-10-20	Some openings adjusted to improve internal daylight / sunlight levels	LB	SC
B	25-09-20	Revised in response to comments received during planning app. consultation period	LB	SC
A	16-08-19	Amendments from final client comments	JS	SC
Issue Date Description			Drawn	Checked

Preliminary for comment

Coppice Wood Lodge, N11

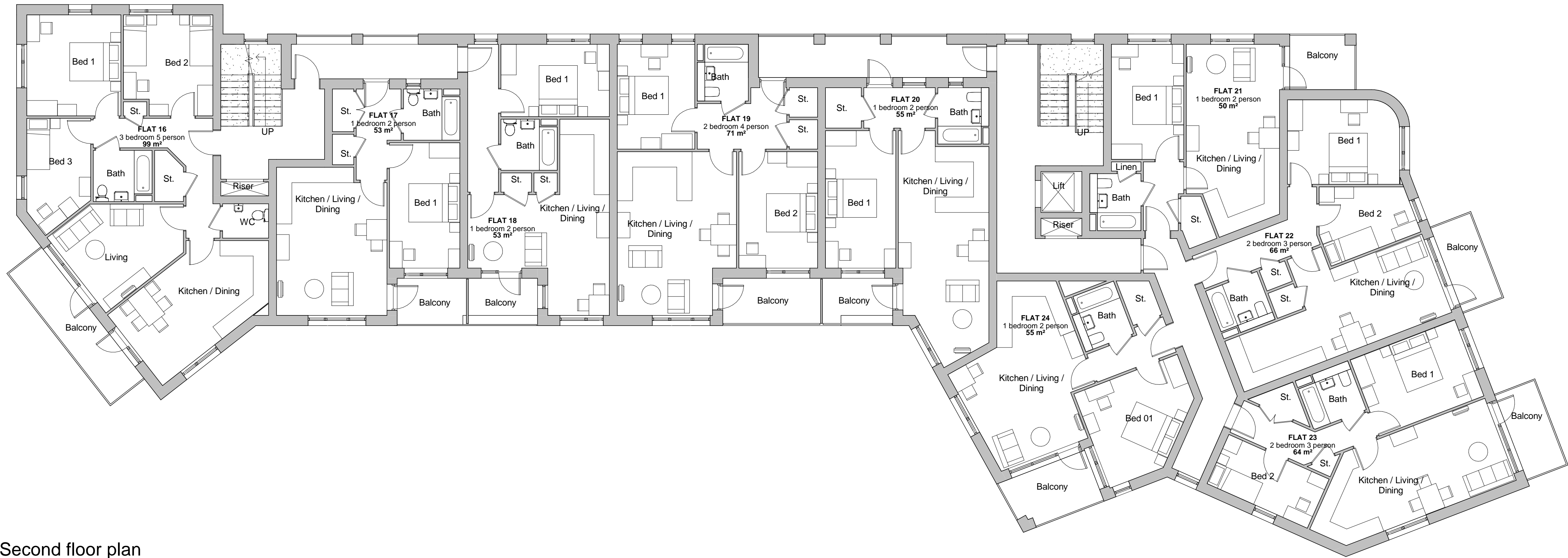
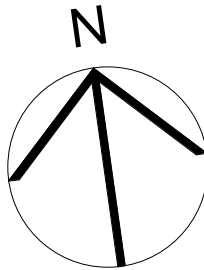
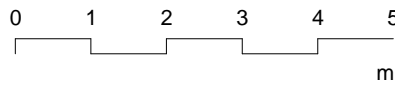
Apartment block

Proposed ground floor plan

Drawing number	Issue	Scale @ A1	Date	Drawn	Checked
1702 P-02	F	1 : 100	29.07.19	JS	SC

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MEPK architects



Second floor plan
1 : 100

D	25-03-21	Front elev. revised to reflect planning comments	LB	SC
C	22-03-21	Front elev. revised to reflect planning comments	LB	SC
B	05-10-20	Some openings adjusted to improve internal daylight / sunlight levels	LB	SC
A	25-09-20	Revised in response to comments received during planning app. consultation period	LB	SC

Issue	Date	Description	Drawn	Checked
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Preliminary for comment

Coppice Wood Lodge, N11

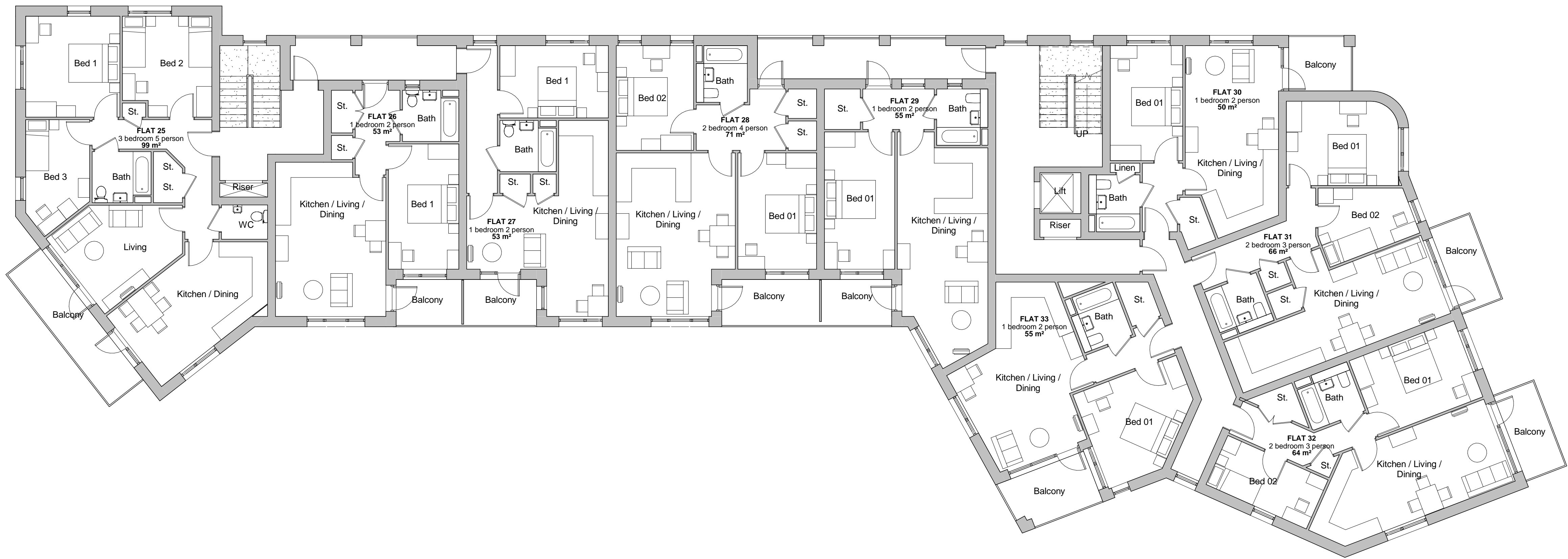
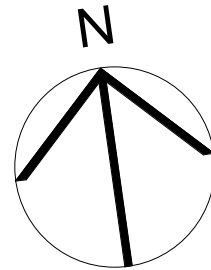
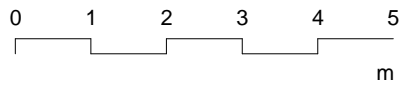
Apartment block

Proposed second floor plan

Drawing number	Issue	Scale @ A1	Date	Drawn	Checked
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Third floor plan
1 : 100

D	25-03-21	Front elev. revised to reflect planning comments	LB	SC
C	22-03-21	Front elev. revised to reflect planning comments	LB	SC
B	05-10-20	Some openings adjusted to improve internal daylight / sunlight levels	LB	SC
A	25-09-20	Revised in response to comments received during planning app. consultation period	LB	SC

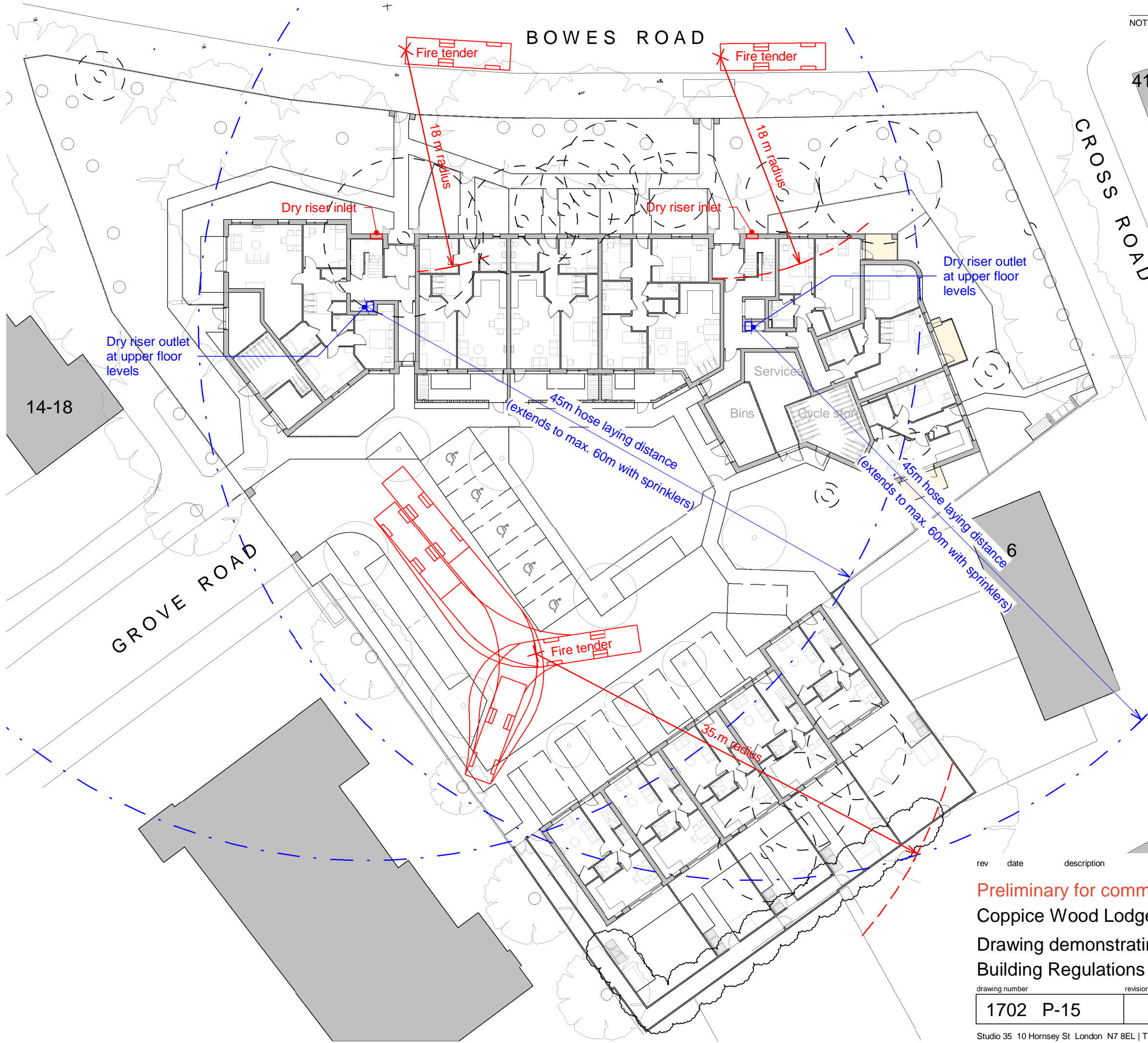
Issue	Date	Description	Drawn	Checked
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Preliminary for comment
Coppice Wood Lodge, N11
Apartment block
Proposed third floor plan

Drawing number	Issue	Scale @ A1	Date	Drawn	Checked
1702 P-05	D	1 : 100	29.07.19	JS	SC

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NOTES		ORIGINAL A3
Clause(s)	Summary	Comment
13.1	Access for appliance <45m from all points within dwellign houses	See adjacent drawing
13.2a	Access for appliance <45m from all points within flats	See adjacent drawing
13.2b	Fire main provision	Will be provided in accordance with paras 13.5 and 13.6 to serve upper floors. Inlet position to be determined as part of detailed Fire Strategy
13.3	Access route and hardstanding as Table 13.1	See adjacent drawing
13.4	Turning for dead-end access route>20m; to comply with Table 13.	See adjacent drawing
13.5, 14.7	Dry fire main; access within 18m of inlet valve on the face of the building	See adjacent drawing
13.6, 14.6	Wet fire main requirements	Not applicable
14.1	Fire main types	Dry is proposed
14.2	Fire main Firefighting shaft	Not applicable
14.3, 14.4	Fire main and outlets in protected stair	See adjacent drawing
14.5	Fire main to BS9990	Noted, will be incorporated into detailed fire strategy and subcontractor design
14.8, 14.9, 14.10, 14.11	Additional fire hydrants	All compartments in the building will be <280sq m The building will be <100m from existing hydrants in Grove Road and Bowes Road (see Thames Water and Topo excerpts below) Detailed Fire Strategy to examine feasibility of retaining private fire main
15.1	Additional fire hydrants	Low rise without a deep basement; Section 13 and Means of Escape provisions apply
15.2-15.11	Firefighting shafts; roller shutters	Not applicable.

rev

date

description

drawn

checked

Preliminary for comment

Coppice Wood Lodge, N11

Drawing demonstrating compliance with Building Regulations Part B5

drawing number

revision

scale @ A3

date

drawn

checked

1702 P-15

1 : 300

24/03/21

LB

SC

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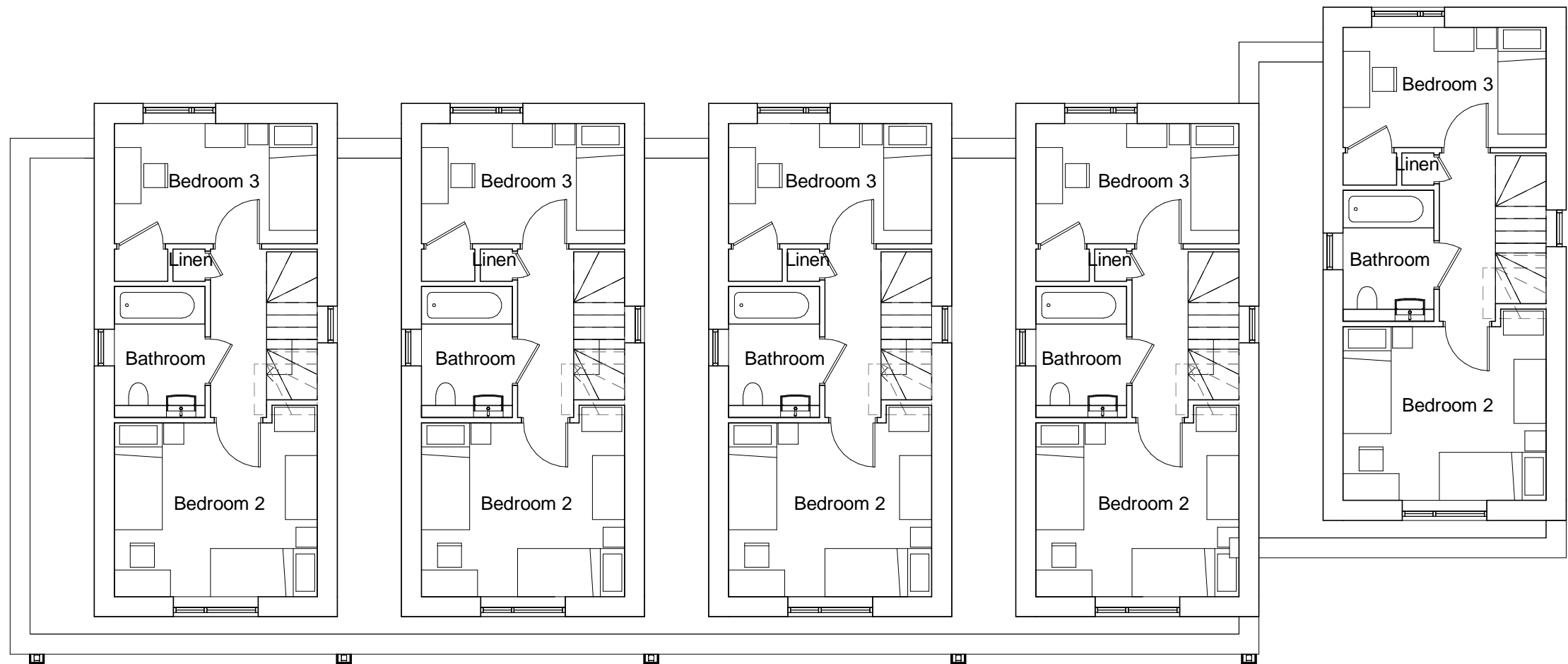
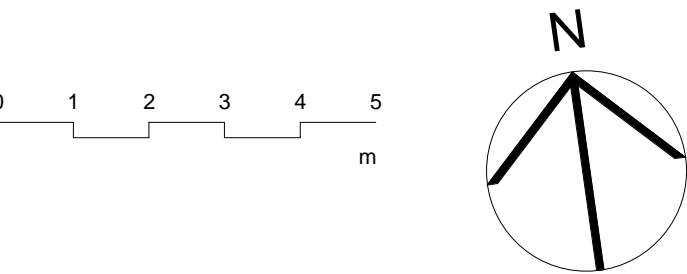
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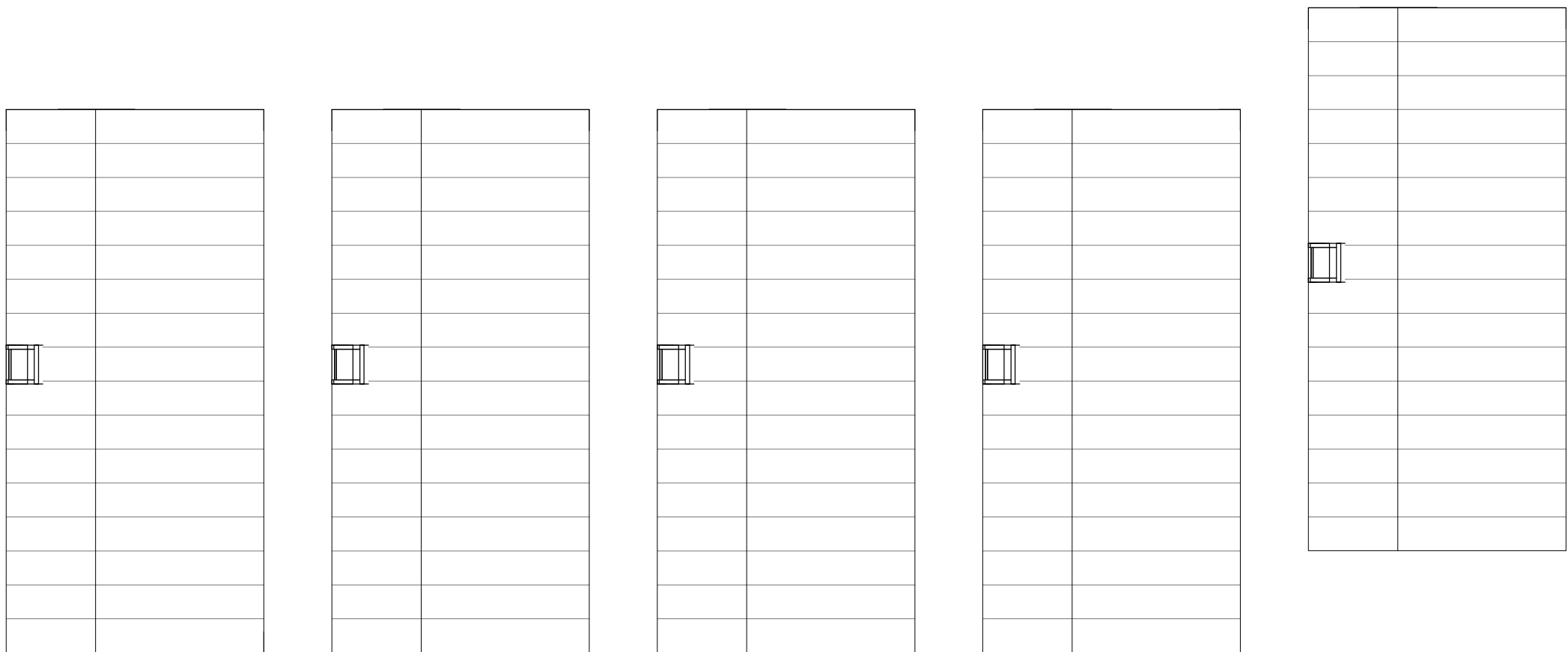
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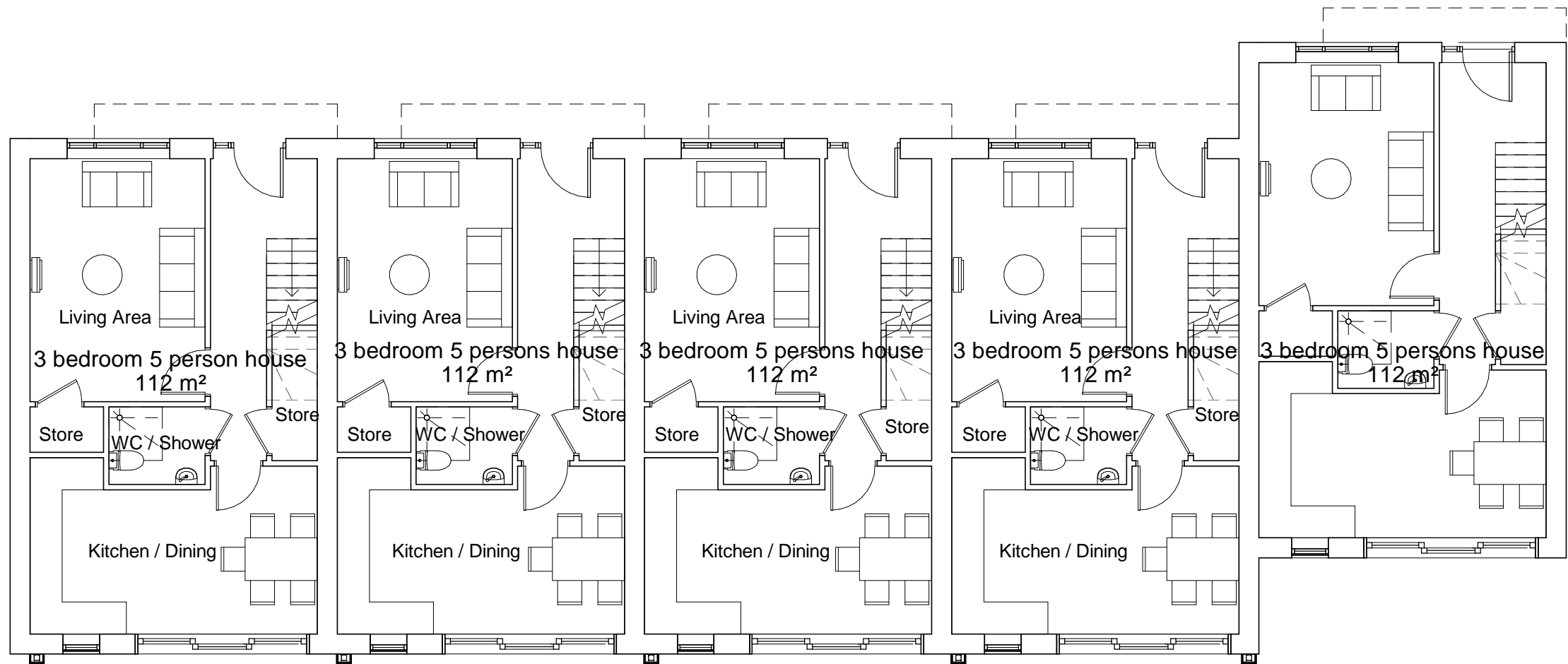
architects



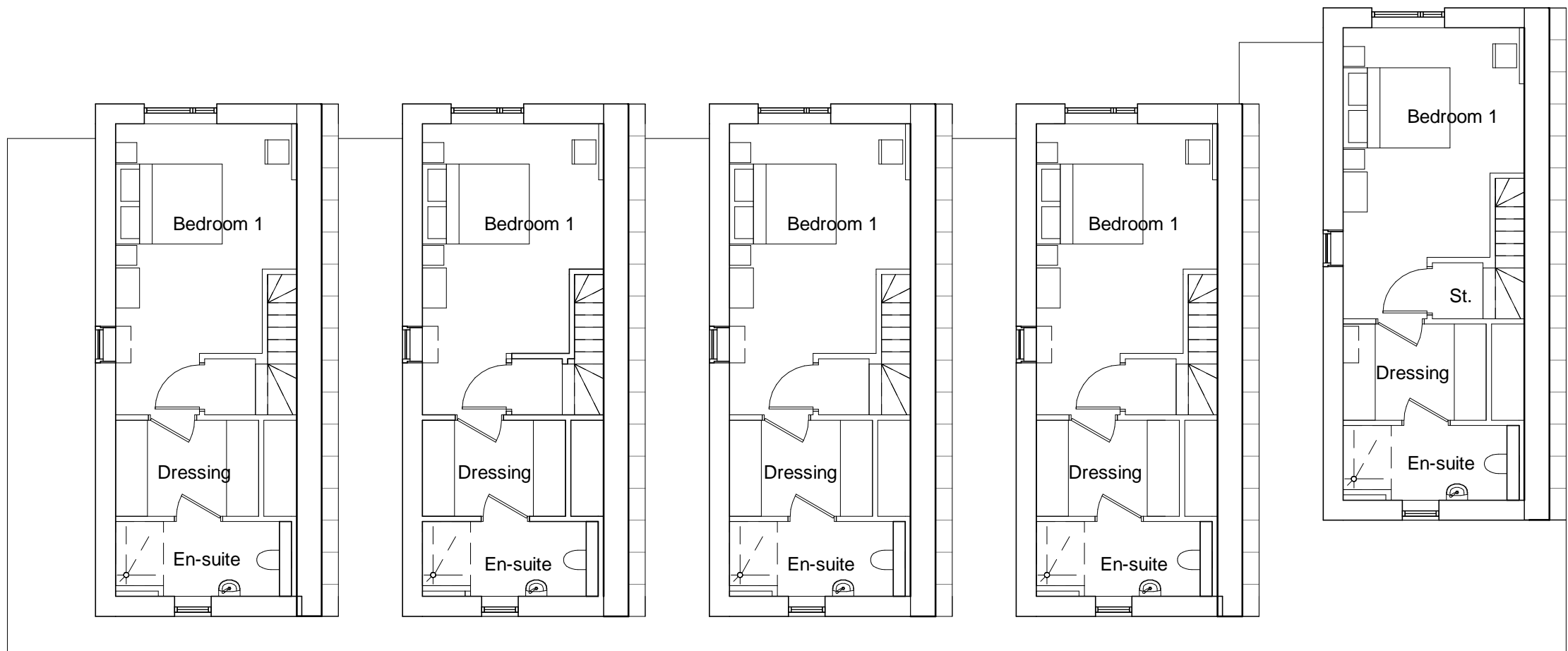
First Floor



Roof Plan



Ground Floor



Second Floor

A	25-09-20	Revised in response to comments received during planning app. consultation	LB	SC
Issue	Date	Description	Drawn	Checked

Planning

Coppice Wood Lodge

Houses Floor and Roof Plans

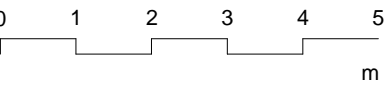
Floor & Roof Plans

Drawing number	Issue	Scale @ A1	Date	Drawn	Checked
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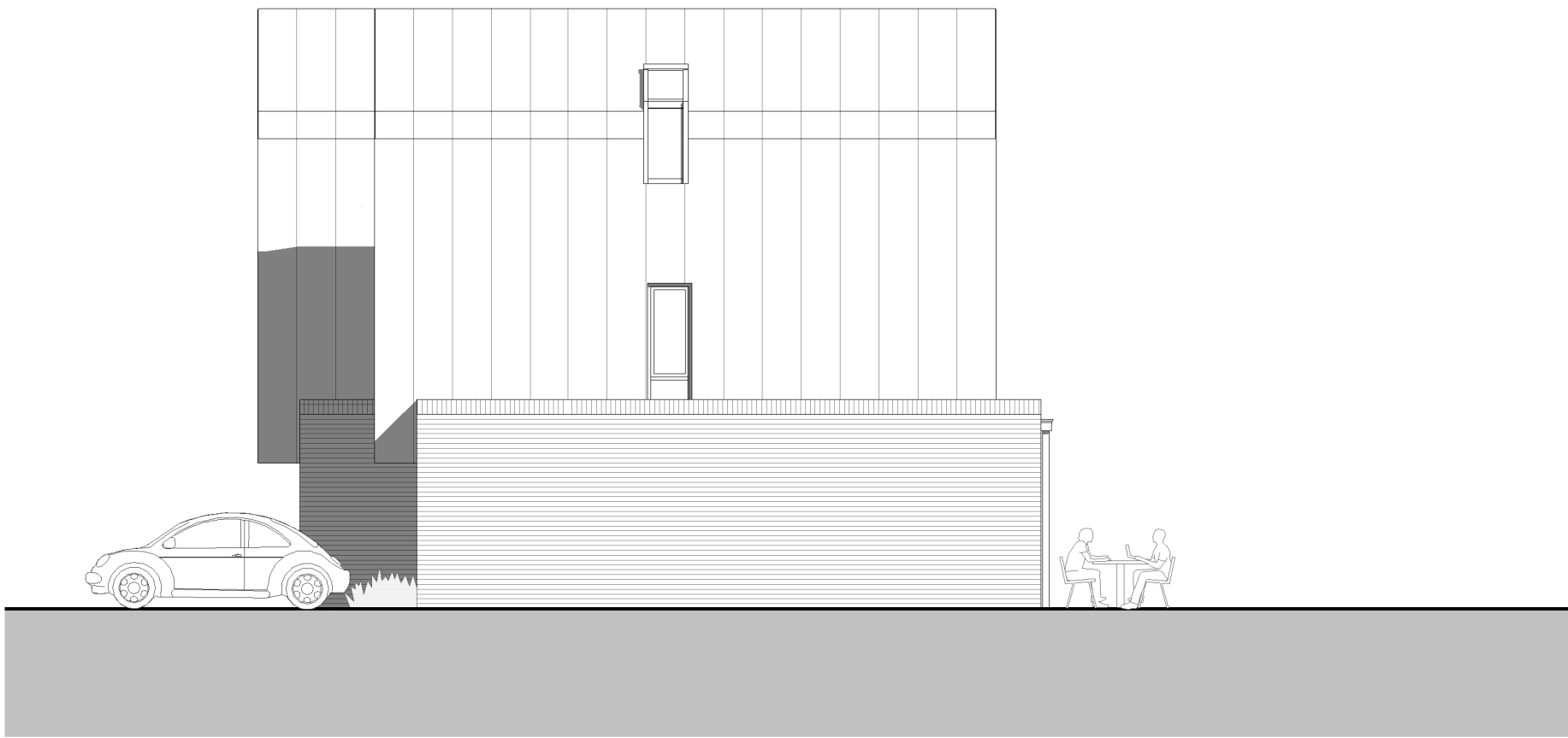
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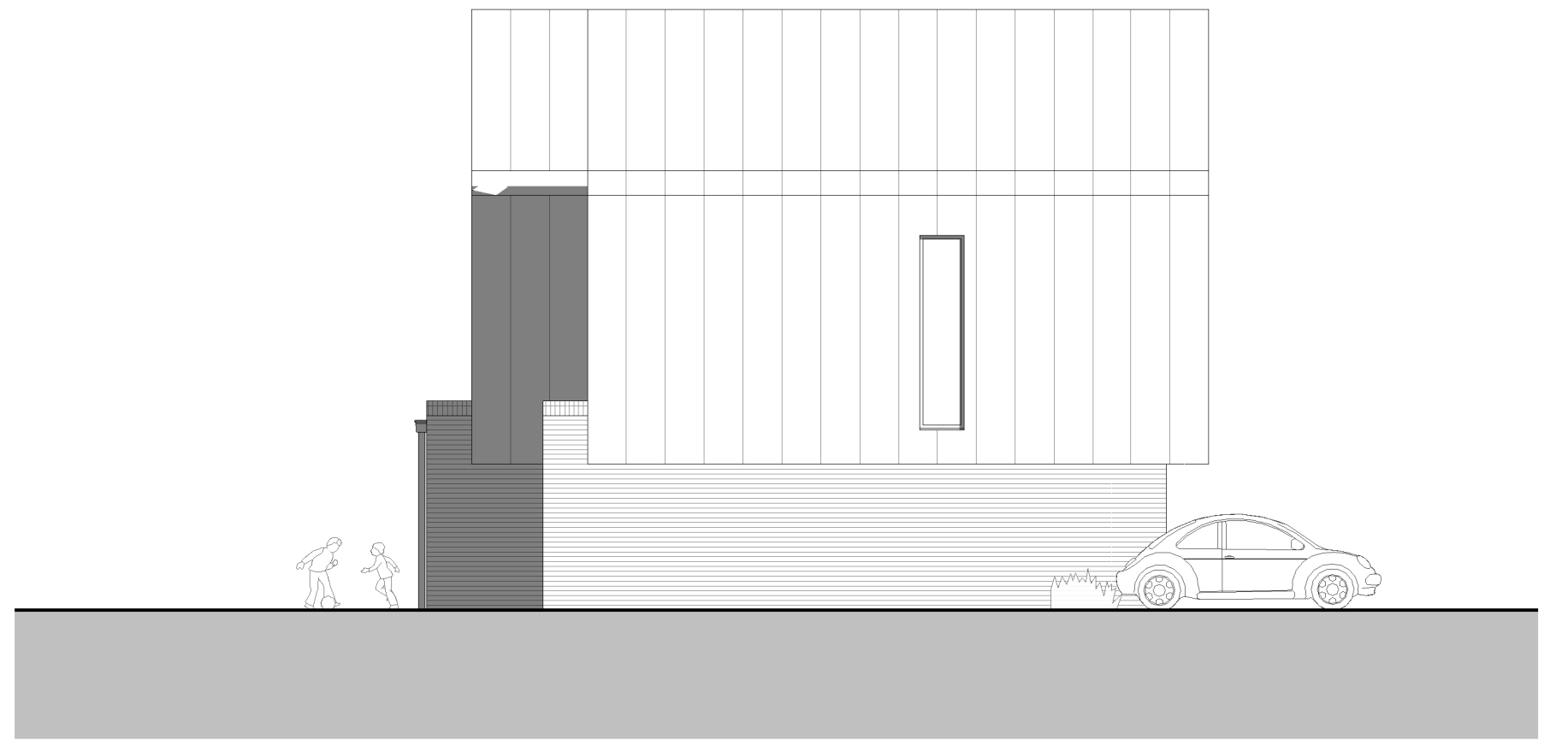
North West Elevation



South West Elevation



South East Elevation



North East Elevation

- Materials schedule**
- External walls:
- Chalky/ buff multi stock brick
 - Standing seam zinc to upper levels
- Roofs
- Standing seam zinc
 - Low pitch roof behind parapets
 - Dark grey/ black aluminium downpipes
- Windows and doors
- Dark grey/ black composite aluminium windows and patio/ garden doors
 - Composite, PAS 24 security standard entrance door

A	25-09-20	Revised in response to comments received during planning app. consultation	LB	SC
Issue	Date	Description	Drawn	Checked

Planning
Coppice Wood Lodge
Houses Elevations

Drawing number	Issue	Scale @ A1	Date	Drawn	Checked
1702 P-22	A	1 : 100	29.07.19	RA	SC

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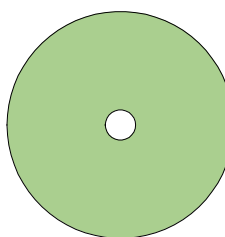
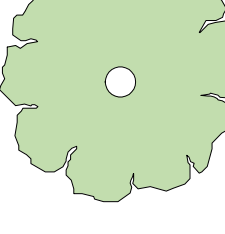
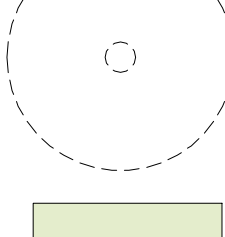
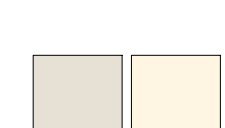
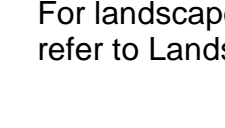




Accommodation schedule

Affordable rent				
•	2B / 3P	w/ch adapt	75m ²	2no
•	3B / 5P	w/ch adapt	99-113m ²	2no
•	3B / 5P	flat	92-96m ²	4no
•	1B / 2P	flat	53m ²	4no
Total				12no
Sale/Shared ownership				
•	1B / 2P	w/ch adapt	64m ²	1no
•	1B / 2P	flat	50-54m ²	13no
•	2B / 3P	flat	64-66m ²	7no
•	2B / 4P	flat	71-80m ²	7no
Total				28no
Sale				
•	3B houses with master bedroom/en'suite in loft		110m ²	5no
Grand total				45no

Key

-  New tree proposed
-  Existing tree retained
-  Existing tree removed
-  Soft landscape
-  Hard landscape

For landscape details and outline specification refer to Landscape Architect's (HED) information

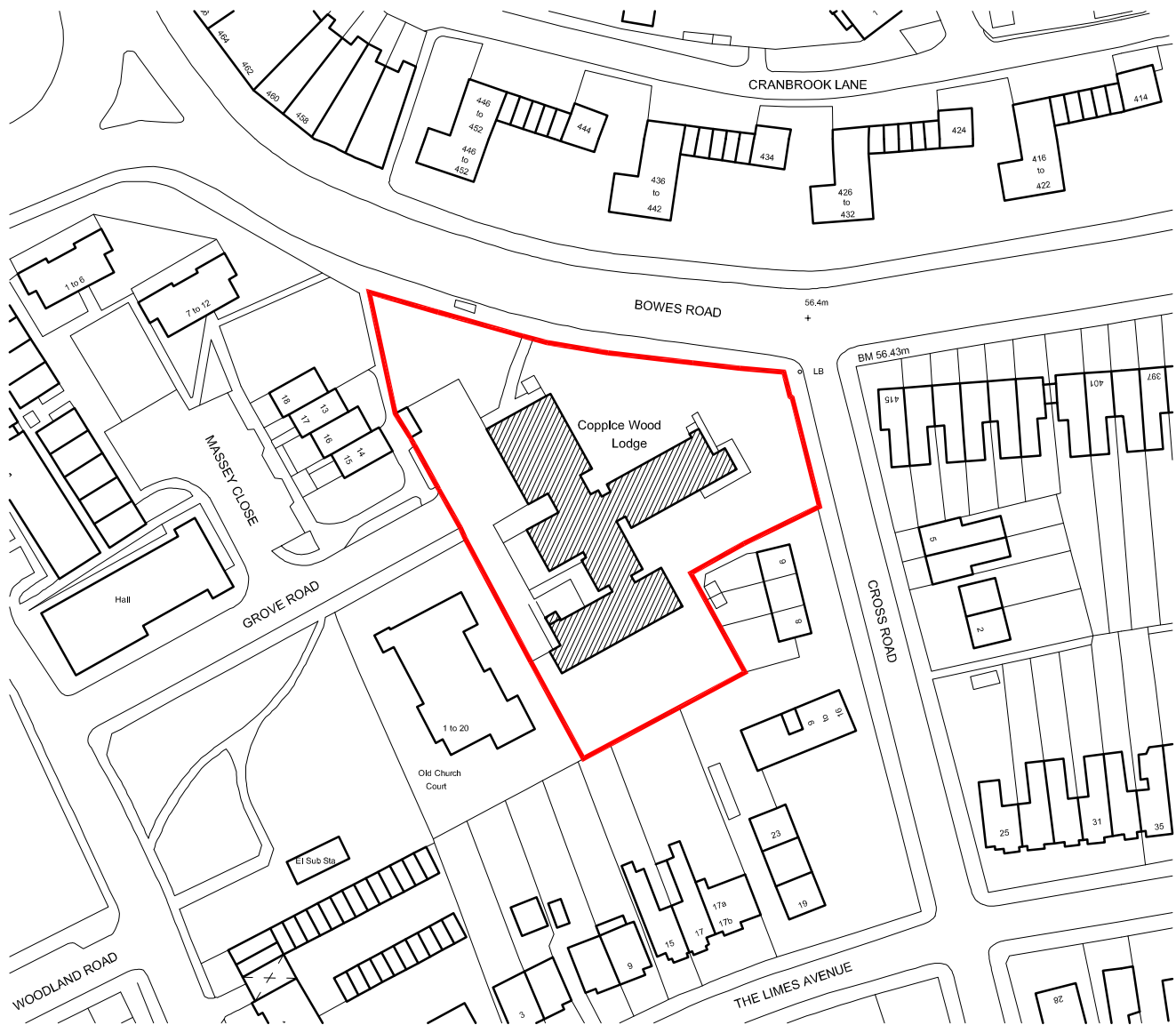
E	25-03-21	Front elev. revised to reflect planning comments	LB	SC
D	22-03-21	Front elev. revised to reflect planning comments	LB	SC
C	12-10-20	Cycle storage added for Flats 2, 3, 4 & 7	LB	SC
B	09-10-20	Additional cycle spaces provided to apartments	LB	SC
A	25-09-20	Revised in response to comments received during planning app. consultation period	LB	SC
rev	date	description	drawn	checked

Preliminary for comment
Coppice Wood Lodge, N11
Proposed plans
Site & Ground floor

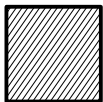
drawing number	revision	scale @ A3	date	drawn	checked
1702 P-01	E	1 : 100	25.06.20	LB	SC

Studio 35, 10 Hoxsey St, London, N7 8EL | T: 020 7700 2706 | london@mepk.co.uk | www.mepk.co.uk





KEY



Building(s) for demolition

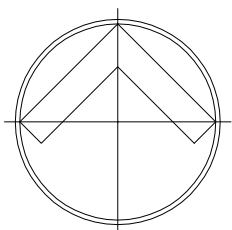


Scale @ 1:1250

Planning

Coppice Wood Lodge

Demolition Plan



drawing number	revision	scale @ A4	date	drawn	checked
1702 P-00	-	1:1250	11/09/2019	JS	SC

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MEPK
architects

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LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 4 January 2022

Report of
Head of Planning
- Vincent Lacovara

Contact Officer:
Andy Higham
Sharon Davidson
Jacob Ripper

Ward:
Haselbury

Ref: 21/03765/RE4

Category: Full Planning Application

LOCATION: Access road to the rear of 158-188 Gatward Green and Adjacent to 156 Church Street, London, N9 9AR

PROPOSAL: Construction of a new heavy duty vehicle crossover to connect Church Street to existing Access Road together with resurfacing and strengthening of the road.

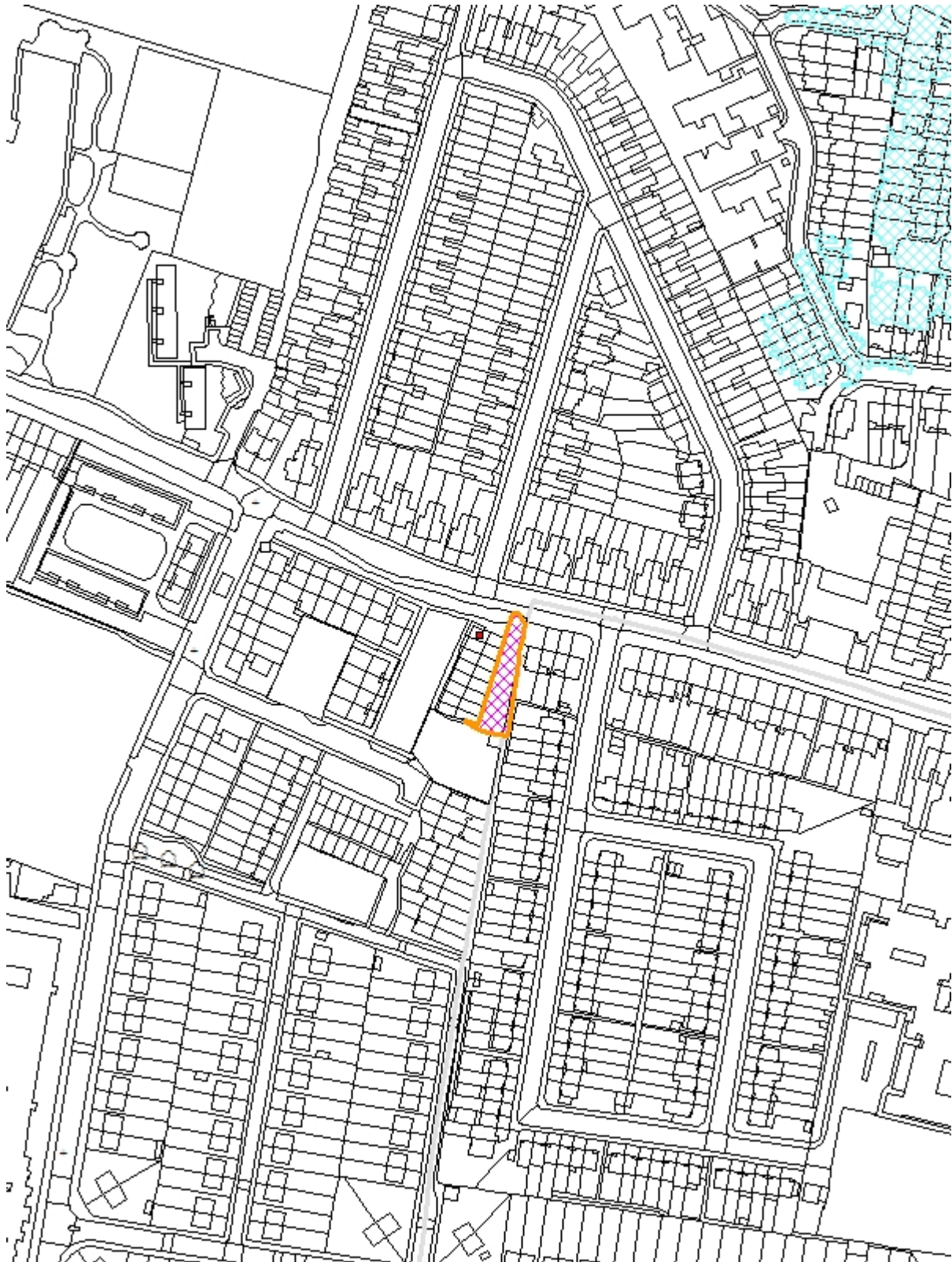
Applicant Name & Address:
Ronke Akingbade
London Borough of Enfield
Civic Centre
Silver Street
Enfield4EN1 3XA

Agent Name & Address:
Amy O'Shaughnessy
London Borough of Enfield
Civic Centre
Silver Street
Enfield4EN1 3XA

RECOMMENDATION:

1. In accordance with Regulation 3 of the Town and Country Planning General Regulations 1992 ,the Head of Development Management / the Planning Decisions Manager be authorised, to **GRANT** planning permission subject to conditions.
2. That delegated authority be granted to the Head of Development Management/Planning Decisions Manager to finalise the wording of the conditions.

Ref: 21/03765/RE4 LOCATION: Access Road Rear Of 158-188 Gatward Green And Adjacent To156 Church Street, London, N9 9AR,



1. Note for Members

- 1.1 The application is reported to the Planning Committee because the applicant for the development is the Council and in accordance with the scheme of delegation, is reported to the Planning Committee for determination.

2. Recommendation:

- 2.1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, the Head of Development Management / the Planning Decisions Manager be authorised to grant planning permission subject to the following planning conditions.

1. Limited Time Period Permission

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. Approved Plans

The development hereby permitted shall be carried out in accordance with the approved plans as set out in the attached schedule which forms part of this notice.

GAT_E_00: Location Plan

GAT_E_01 Rev 2: Existing Plan

GAT_P_01 Rev 2 (27.11.21): Proposed Plan

GAT_P_01 Rev 1 (30.09.21): Proposed Plan with Swept Path (duplicate drawing number)

SP-A-1001 Rev C1: Housing Site 2

16138.OS.102.01: Swept Path 26t

16138.OS.102.02: Swept Path 26t

16138.OS.102.05: Swept Path 3.5t panel van

Design & Access Statement

Photo of Gate

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

3. Gated Access

Prior to first use of the new vehicular access, details of the secured gated entrance and how authorised persons are granted access shall be submitted to and approved in writing by the Local Planning Authority. The gates shall be installed in accordance with the approved plans and thereafter maintained

Reason: In the interests of protecting neighbouring occupier's safety and amenity.

- 2.2 That delegated authority be granted to the Head of Development Management/Planning Decisions Manager to finalise the wording of the conditions.

3. Executive Summary:

- 3.1. The application site is Council-owned land and sits to the east of rear gardens at Nos. 158-188 Gatward Green, to the west side of No. 56 Church Street, and to the west of rear gardens at Nos. 1 and 3 Hydeside Gardens. It is to the north of Site 2, as identified in the planning permission that was granted under ref 16/04185/RE4 for the redevelopment of three sites involving demolition of existing garages and erection of two and three storey terraced dwellings to provide 12 residential units.



- 3.2. The application seeks planning permission to increase the width of an approved vehicle access road associated with the redevelopment of three sites. The proposal includes resurfacing and provision of a new heavy-duty crossover with access from Church Street. The access will provide infrequent vehicular access by UKPN to service an existing substation.
- 3.3. The primary reasons for recommending approval are:
- The development would provide needed access by UKPN to the existing substation.
 - The applicant has proposed a secure gate to limit access to only those with authorisation.
 - There is no negative impact to residential amenities.
 - The new crossover and access are designed in a way to eliminate unauthorised access and parking.

4. Site and Surroundings:

- 4.1. The subject site is owned by the London Borough of Enfield and is located northeast of Gatward Green and south of Church Street. It contains an existing substation and an approved vehicle access route to the substation (ref 16/04185/RE4). The surrounding area is primarily residential.
- 4.2. The subject site is not within a conservation area and contains no listed buildings. Church Street to the north is a Classified Road. The site is at low risk from both fluvial and surface water flooding.

5. Proposal

- 5.1. The proposal includes the construction of a new heavy duty vehicle crossover to connect Church Street to an approved access road together with resurfacing and strengthening of the road, and removal of a short portion of hedging.
- 5.2. The access road was approved by a previous planning permission (ref 16/04185/RE4) noted below, that provides access to the existing substation. It was reliant on an access point that would not be suitable for heavy duty vehicles, hence the subject application proposing a new crossover.
- 5.3. As such, the review of this planning application takes consideration of the previous grant of planning permission, limited to this access point, and the extent of possible impacts from the new proposed development.

6. Relevant Planning History:

- 6.1. 16/04185/RE4 – Granted with Conditions – 09/12/2016: Redevelopment of 3 sites involving demolition of existing garages and erection of two and three storey terraced dwellings to provide 12 residential units comprising of (5 x 3-bed)- Site 2

and (7 x 2-bed)- Site 3, with associated landscaping, cycle parking, refuse storage and off street parking - Site 1.

6. Consultation:

Public Response

- 6.1. Consultation letters were sent to 37 neighbouring properties (21 days expired 5 December 2021).
- 6.2. In response to the publicity two representations were received, objecting to the proposal. The comments are summarised below:
- Close to adjoining properties
 - Development too high
 - Increase in traffic
 - Increase of pollution
 - Inadequate access
 - Information missing from plans
 - Loss of privacy
 - Noise nuisance
 - Not enough info given on application
 - Over development

There were also concerns raised about the loss of trees associated with the wider redevelopment, burglaries, car break-ins, fly-tipping, and general quality of life.

Officer's comments: The objections raised are addressed in this report, where further discussion is required. Both objectors were provided with the submitted drawings as it seemed they were having difficulties finding them online.

It is noted that since, one objector has confirmed they are satisfied with the documents provided by the Planning Officer in regards to the subject application, but still had concerns regarding vegetation removal. The area subject to vegetation allegedly removed is outside of the redline of the application and does not form part of this application but is addressed further in the report below.

Overall, it is considered that the comments made have been sufficiently addressed below and do not outweigh the justification for recommending approval.

Statutory and Non-Statutory Consultees:

- 6.3. Highway Services – Excavations:

No objections.

- 6.4. Highway Services – Street Trees:

No objections.

6.5. Transportation:

There was no objection to the new access to a classified road due to the low number of infrequent vehicle trips. Requested additional details of the proposed crossover, location of bollards and gates, etc. which were provided by the applicant. Upon review of the revisions, no objections were raised.

7. Relevant Policies

7.1. London Plan (2021)

GG2: Making the best use of land
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
SI 1: Improving air quality
T7: Deliveries, servicing and construction

7.2. Core Strategy (2010)

CP 24: The Road Network
CP 30: Maintaining and Improving the Quality of the Built and Open Environment

7.3. Development Management Document (2014)

DMD 37: Achieving High Quality and Design-Led Development
DMD 45: Parking Standards and Layout
DMD 46: Vehicle Crossovers and Dropped Kerbs
DMD 47: Access, New Roads and Servicing
DMD 80: Trees on Development Sites
DMD 81: Landscaping

7.4. Other relevant Policy/Guidance

National Planning Policy Framework (NPPF)
National Planning Practice Guidance (NPPG)
Enfield Revised Technical Standards for Footway Crossovers (2013)

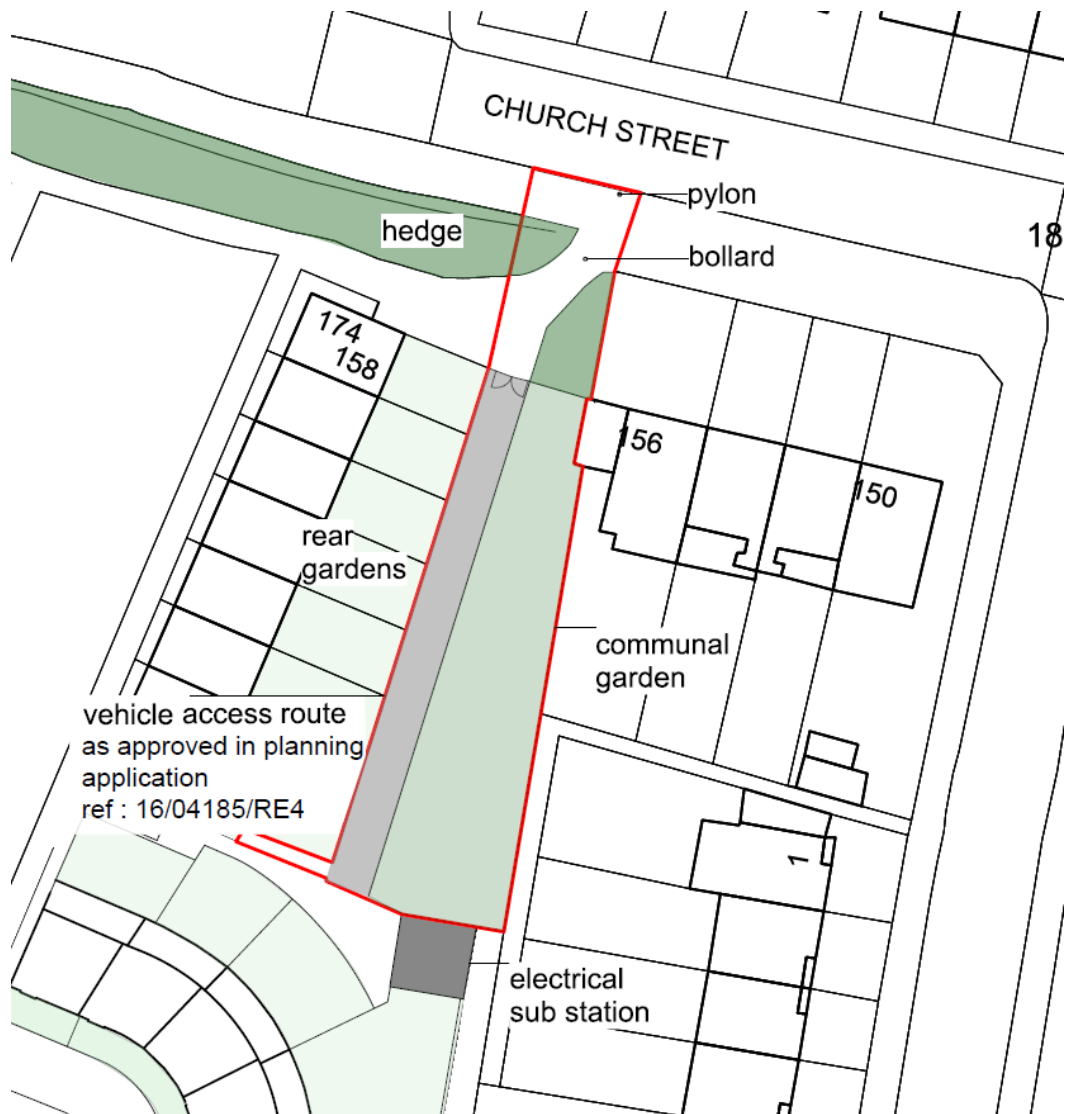
8. Analysis

8.1. The main planning considerations of the development are the following:

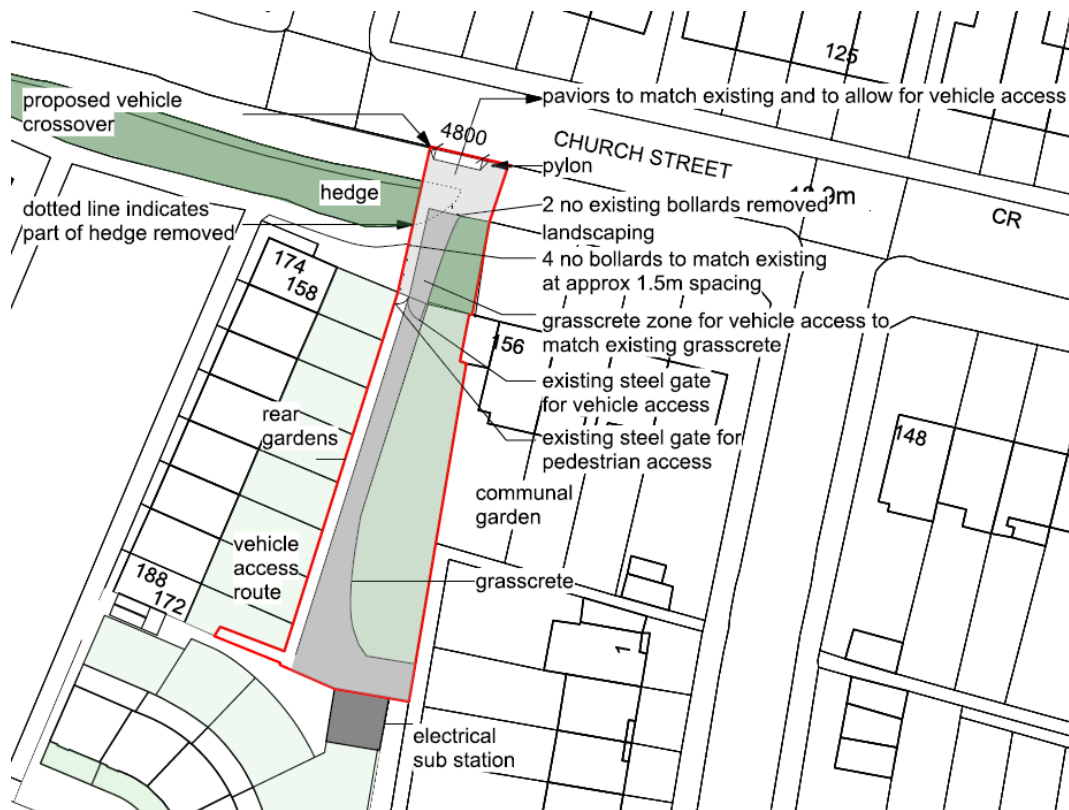
- Principle of the development.
- Impact on the neighbouring amenity.
- Trees and landscaping.
- Transportation and impacts to highway safety.

8.2. Principle of Development

- 8.2.1. A vehicle access route on the site was approved by ref 16/04185/RE4, which granted planning permission for the redevelopment of three sites within the area to provide 12 new dwellings, parking, and associated development. The approved route is identified below.



- 8.2.2. The current proposal seeks to add a heavy-duty crossover to Church Street, increase the depth of the of the grasscrete paving by 9.2m, and include an area for manoeuvring vehicles. The proposed site layout is copied below.



8.2.3. The proposed changes do not seek to alter the land use; therefore, the principal of the approved development remains the same and no objections are raised. Further details are discussed below in this report.

8.3. Impact on the Neighbouring Amenity

8.3.1. The National Planning Policy Framework identifies as a core planning principle that planning should always seek a high quality of design and a good standard of amenity for all existing and future occupants of land and buildings. Policy D3 of the London Plan states that developments should have appropriate regard to their surroundings and enhance the local context. Policy CP 30 of the Core Strategy seeks to ensure that new developments are high quality and design-led, having regards to their context. Policy DMD 37 states that development that is not suitable for its intended function, that is inappropriate to its context, or which fails to have appropriate regard to its surroundings should be refused.

8.3.2. Objections were received that raised concerns regarding pollution, increase in traffic, and noise disturbance.

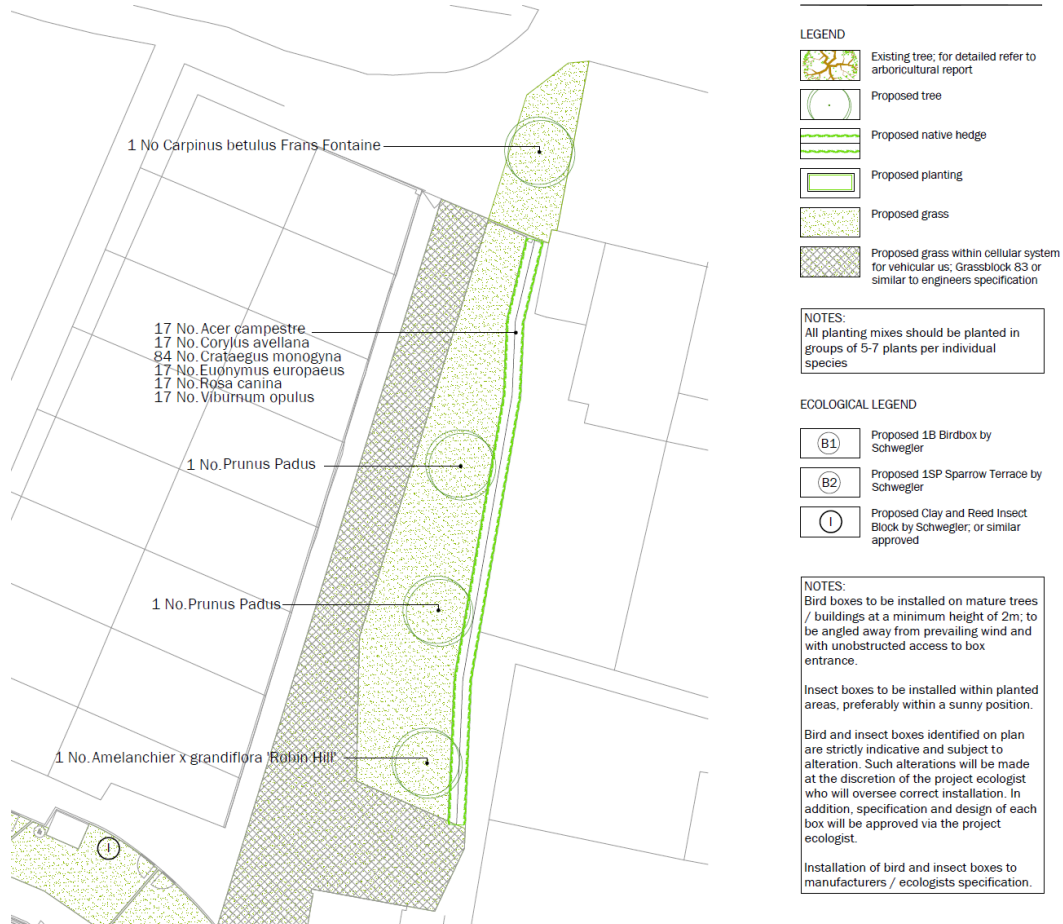
8.3.3. The new access point will only be used for infrequent service vehicles from UKPN to the existing sub station, and occasional emergency vehicles. As these trips would be extremely limited, and restricted to infrequent emergency or maintenance service, no impact to residential amenities are anticipated, and would not result in significant levels of pollution, traffic, or other disturbances. The access would be

gated and therefore could not be used by other vehicles, details of which have been included as a condition.

- 8.3.4. Other concerns raised in objections included crime, burglaries, and fly tipping. As the access would be gated and locked, it is considered unlikely that these activities or other anti-social behaviour would occur. If individuals were to gain unauthorised access, this would be considered trespassing, as with any other secured and private development. The applicant has provided an example of the gates to be used and it is considered an acceptable method of security whilst providing visual permeability to deter and such unauthorised access or otherwise illegal activities. Further details have been included as a condition.

8.4. Trees and Landscaping

- 8.4.1. Policy DMD 80 states that development involving the loss or harm to trees covered by Tree Preservation Orders or other trees of significant biodiversity or amenity value should be refused.
- 8.4.2. The proposed scheme involves no loss of trees, and therefore complies with relevant policy.
- 8.4.3. However, one objection has been received about the loss of trees. The applicant has provided the Arboricultural report and planting proposals for the wider redevelopment scheme for reference purposes. No trees have been removed from the site beyond what was approved under application reference 16/04185/RE4, but some hedging and vegetation were removed adjacent to the site to install fencing as part of the previously approved plans.
- 8.4.4. It is advised that any hedge or shrub removal referenced in objections or in this report is not related or linked to the current application. The area of vegetation removal is outside of the redline of the application site. The Housing Team are aware of the residents concerns regarding the shrub removal and are in contact to resolve neighbourly issues, by means of providing additional plantings for screening.
- 8.4.5. The previous application (reference 16/04185/RE4) also included the replanting of hedges along with the introduction of four trees within the open space adjacent to the access and drive. Again, it is noted that this is outside of the redline of the current application but has been included for background and context.



8.4.6. A short length of hedging to the site frontage would be removed (approximately 2m-3m), to accommodate the new dropped kerb whilst avoiding existing street furniture. New paving would match the existing paving along the footway and crossover, and the resurfaced access way will be “grasscrete” – a type of highly permeable cellular paving that allows for vegetation to grow within and through it.

8.4.7. Based on the minimal removal of hedging for the proposed crossover, the extent of permeable paving being proposed, and the absence of trees being removed, it is considered that the proposal complies with Policy DMD 80.

8.5. Transportation and Impact to Highways

8.5.1. Policy DMD 46 outlines when vehicle crossovers and dropped kerbs to facilitate off-street parking would be permitted and notes that new access onto “A” roads and other busy classified roads will not normally be permitted. The Council’s Revised Technical Standards for Footway Crossovers (2013) provides safety and dimensional standards for new dropped kerbs and vehicle access, including minimum and maximum widths in the interests of pedestrian and highway safety.

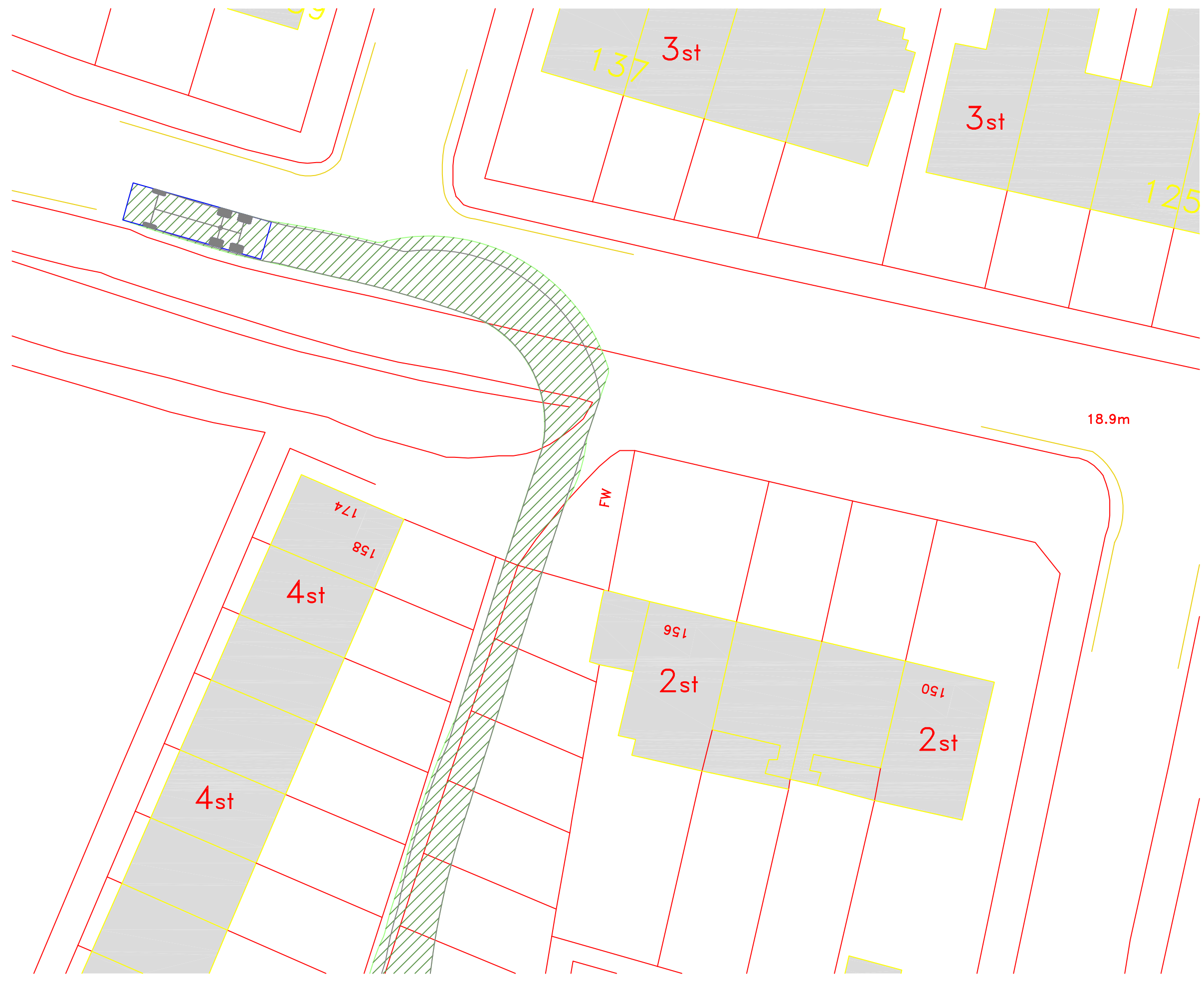
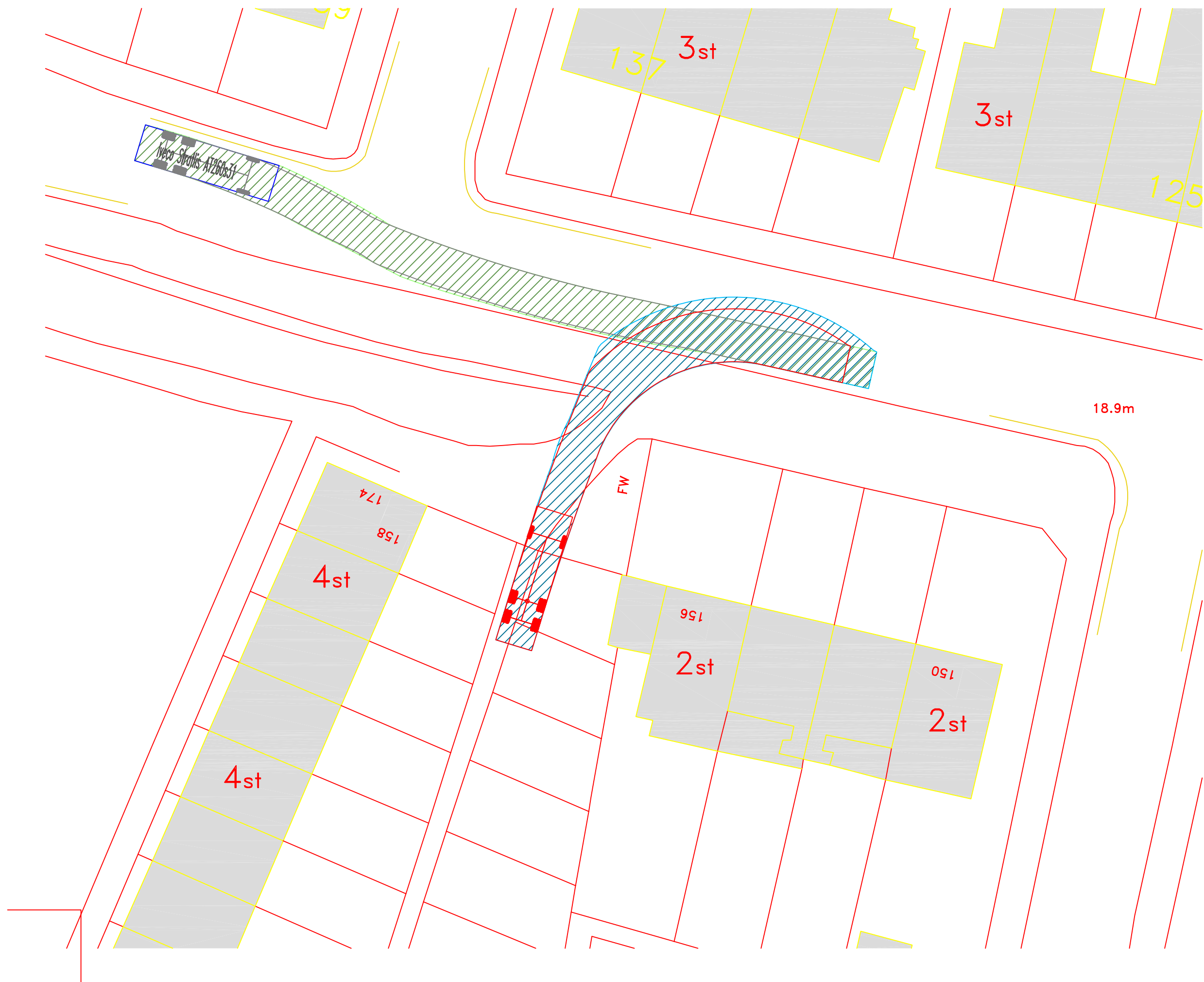
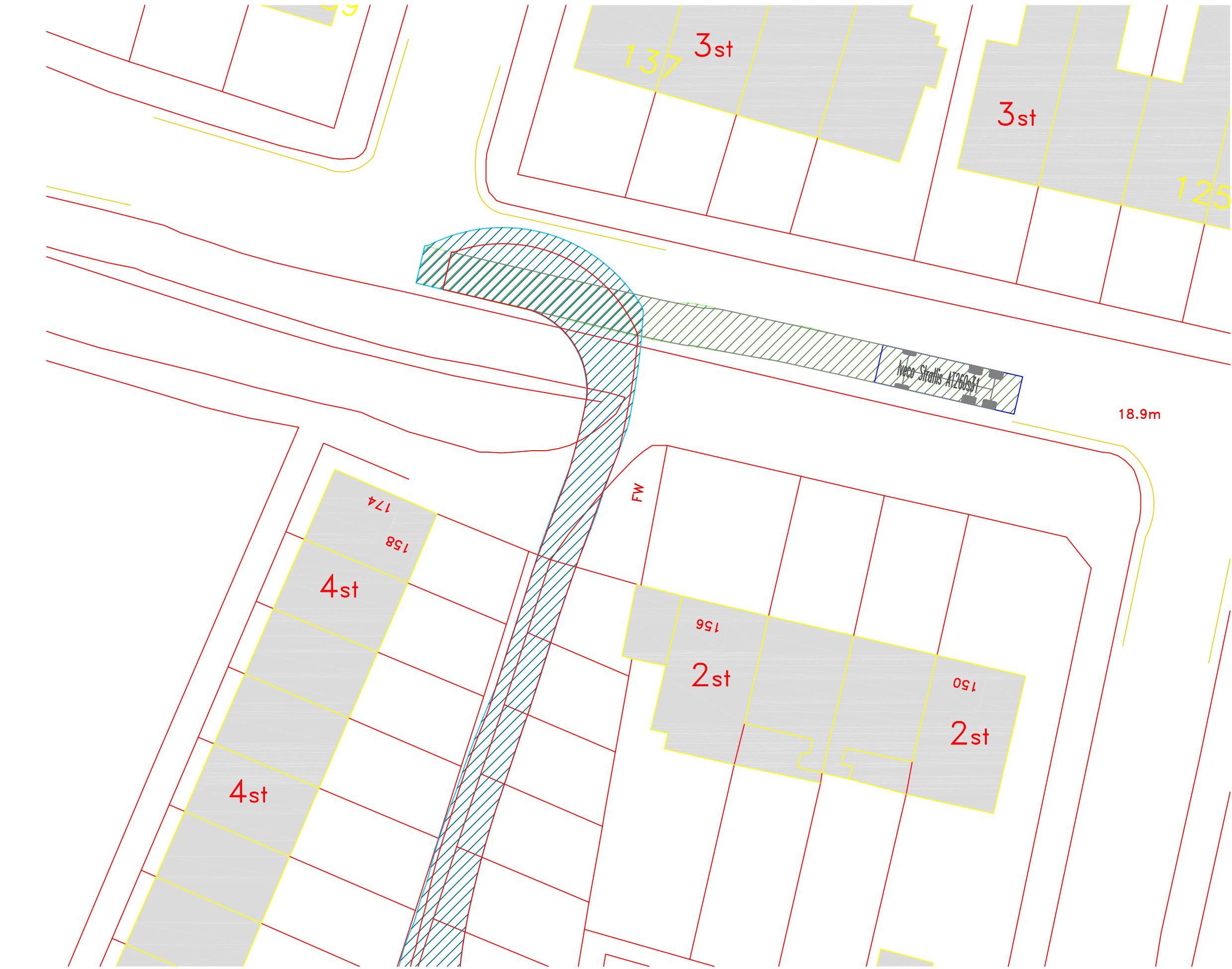
8.5.2. Access is proposed to Church Street, which is a classified road, and new access would not normally be permitted. However, consultation comments from

Transportation and Highways supported the proposal as the nature of the use would be very infrequent and limited, as opposed to a residential or commercial use. Furthermore, the gated access is recessed into the site, away from the footway and road, so that when a vehicle enters and exits they would not impede the free flow of traffic on Church Street. As such, no objections are raised in regard to a new access point.

- 8.5.3. The width of the crossover is 4.8m, which would meet the Council's technical standards. In order to facilitate this, the applicant has proposed to remove a short length of hedge along Church Street, with the minimum amount removed to support the new crossover.
- 8.5.4. The applicant has also proposed four bollards along the western point of the access, before the locked gate, to discourage unauthorised access and/or illegal parking on the existing hardstanding. These would mitigate the removal of two existing bollards at the back of the footway that currently prevent this. Authorised vehicles would park near the substation to the south while providing services, and the applicant has submitted several swept path diagrams showing that the access is of adequate width and that vehicles can enter and exit the site adequately.
- 8.5.5. Given the above, it is considered the new access would not cause harm to traffic or congestion in area, and that there would be no impact to parking availability.

9. **Conclusion**

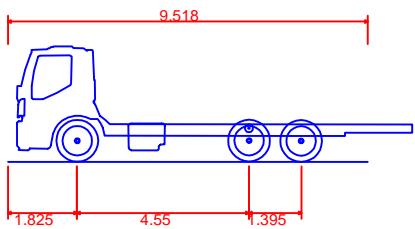
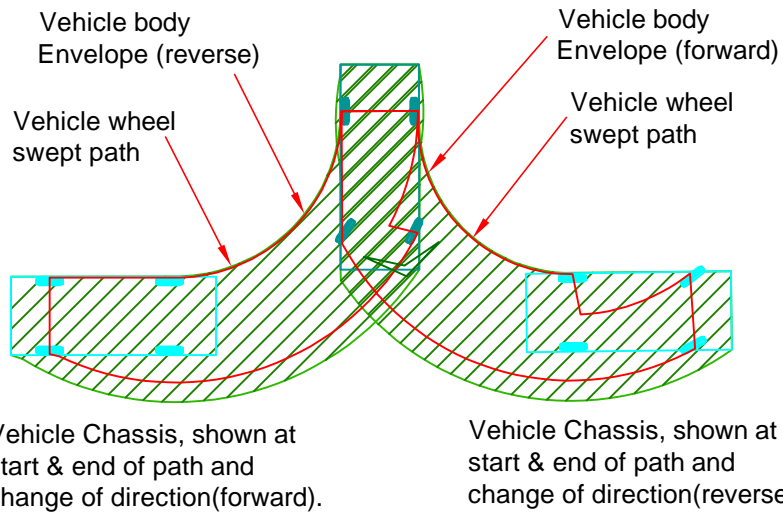
- 9.1. The merits have been assessed and the proposal is considered to be acceptable having regard to relevant policies within the local, regional, and national policies, guidelines, and framework but particularly DMD 37, DMD 45, DMD 46 and DMD 47. The proposal is therefore recommended for approval subject to the recommended planning conditions.



GENERAL NOTES

1. This drawing to be read in conjunction with all relevant civil engineering drawings.

LEGEND



Iveco Stralis AT260s31
Overall Length 9.518m
Overall Width 2.550m
Overall Body Height 2.995m
Min Body Ground Clearance 1.488m
Track Width 2.550m
Lock to Lock Time 2.00s
Wall to Wall Turning Radius 9.240m

NOT FOR CONSTRUCTION

Rev	Date	Description	Drawn	Check
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5A Andrews Buildings
Penarth, CF64 2AA
Tel 029 2070 0924
mail@limetransport.com
www.limetransport.com

Drawing Status

PRELIMINARY

Project

Gatward Green, Enfield

Project No

16138

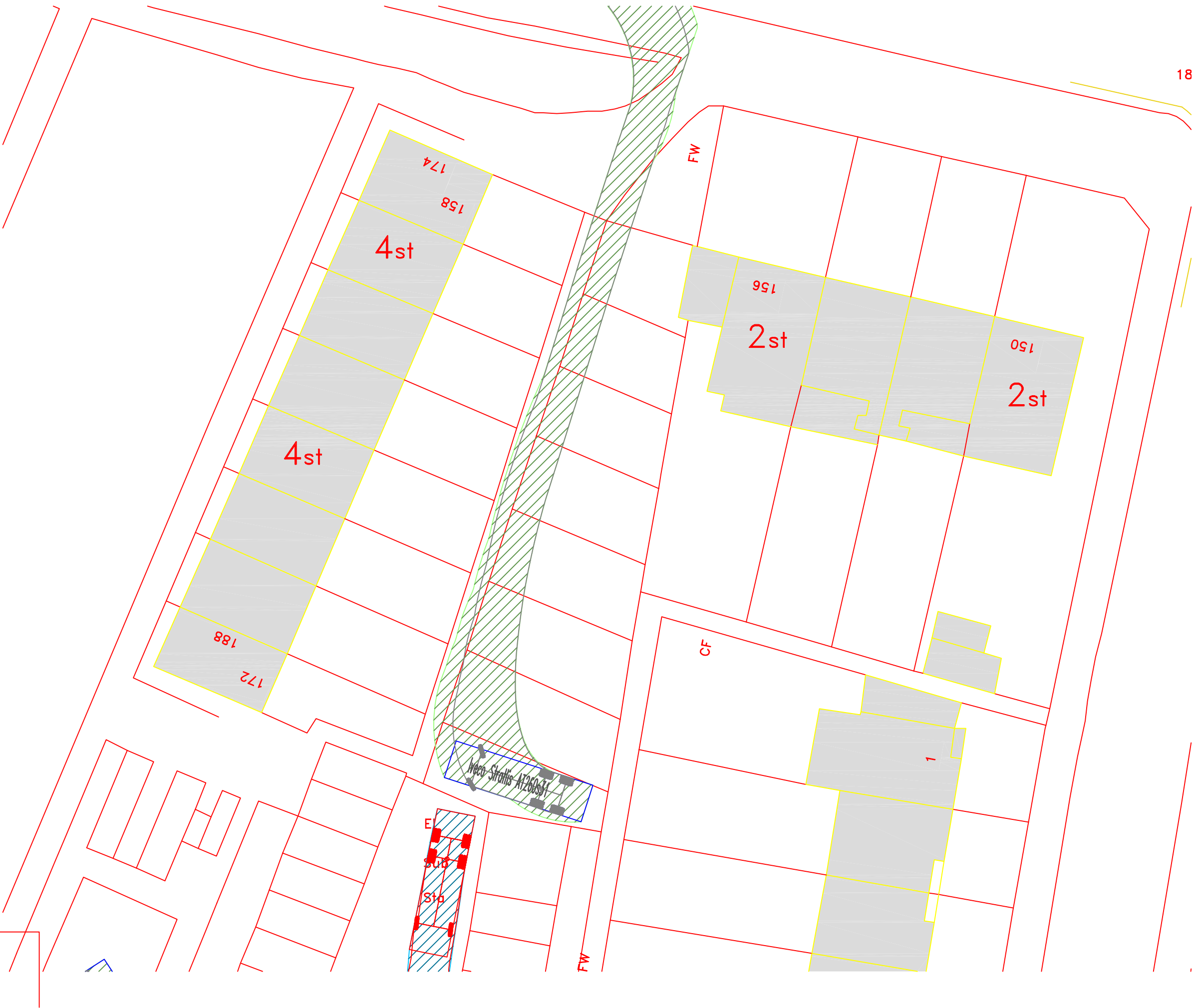
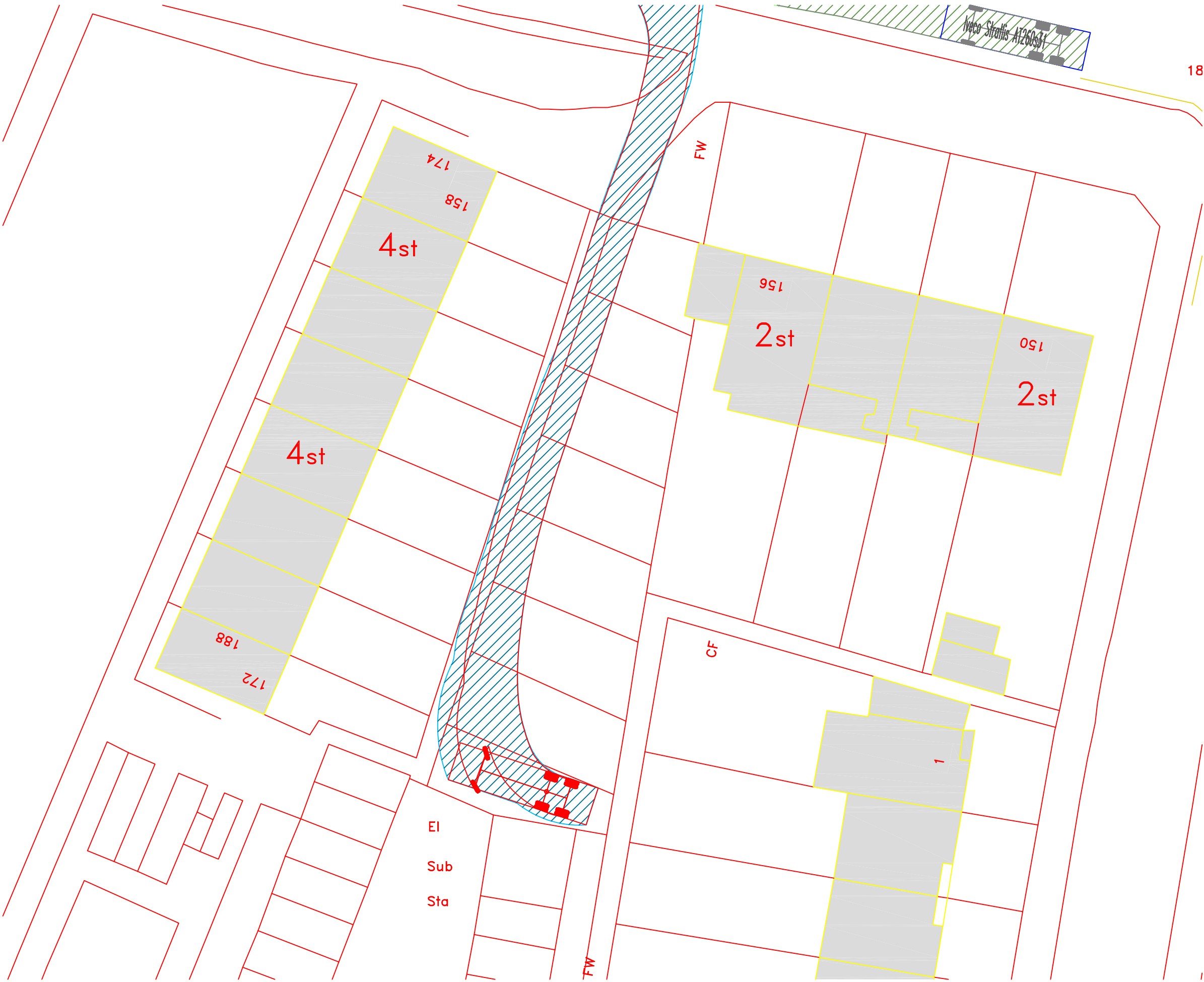
Client Project No

Revision

Vehicle swept-path analysis
access to electricity sub-station
- Iveco Stralis 26tonne

Drawing No

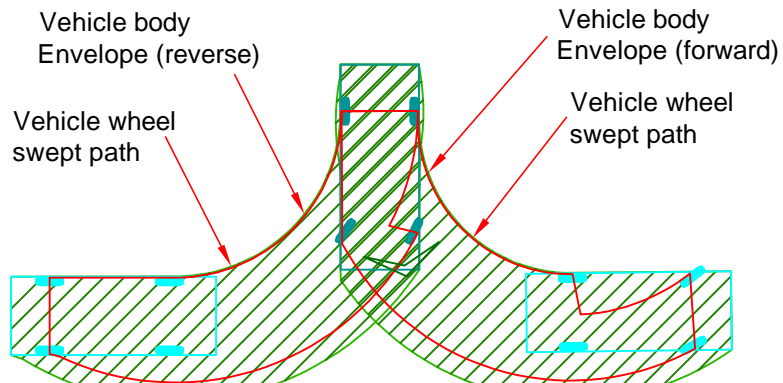
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GENERAL NOTES

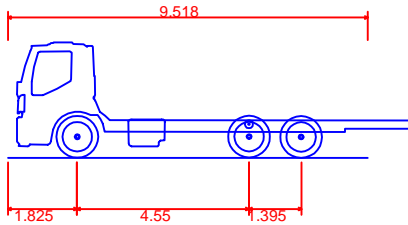
1. This drawing to be read in conjunction with all relevant civil engineering drawings.

LEGEND



Vehicle Chassis, shown at start & end of path and change of direction(forward).

Vehicle Chassis, shown at start & end of path and change of direction(reverse).



Iveco Stralis AT260s31
Overall Length 9.518m
Overall Width 2.550m
Overall Body Height 2.995m
Min Body Ground Clearance 1.488m
Track Width 2.550m
Lock to Lock Time 2.00s
Wall to Wall Turning Radius 9.240m

NOT FOR CONSTRUCTION

Rev	Date	Description	Drawn	Check
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Drawing Status Date August 2016

PRELIMINARY Scale 1:250 @ A1

Project Drawn ABR

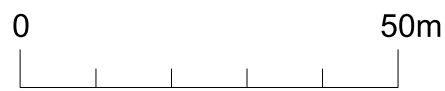
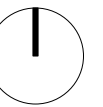
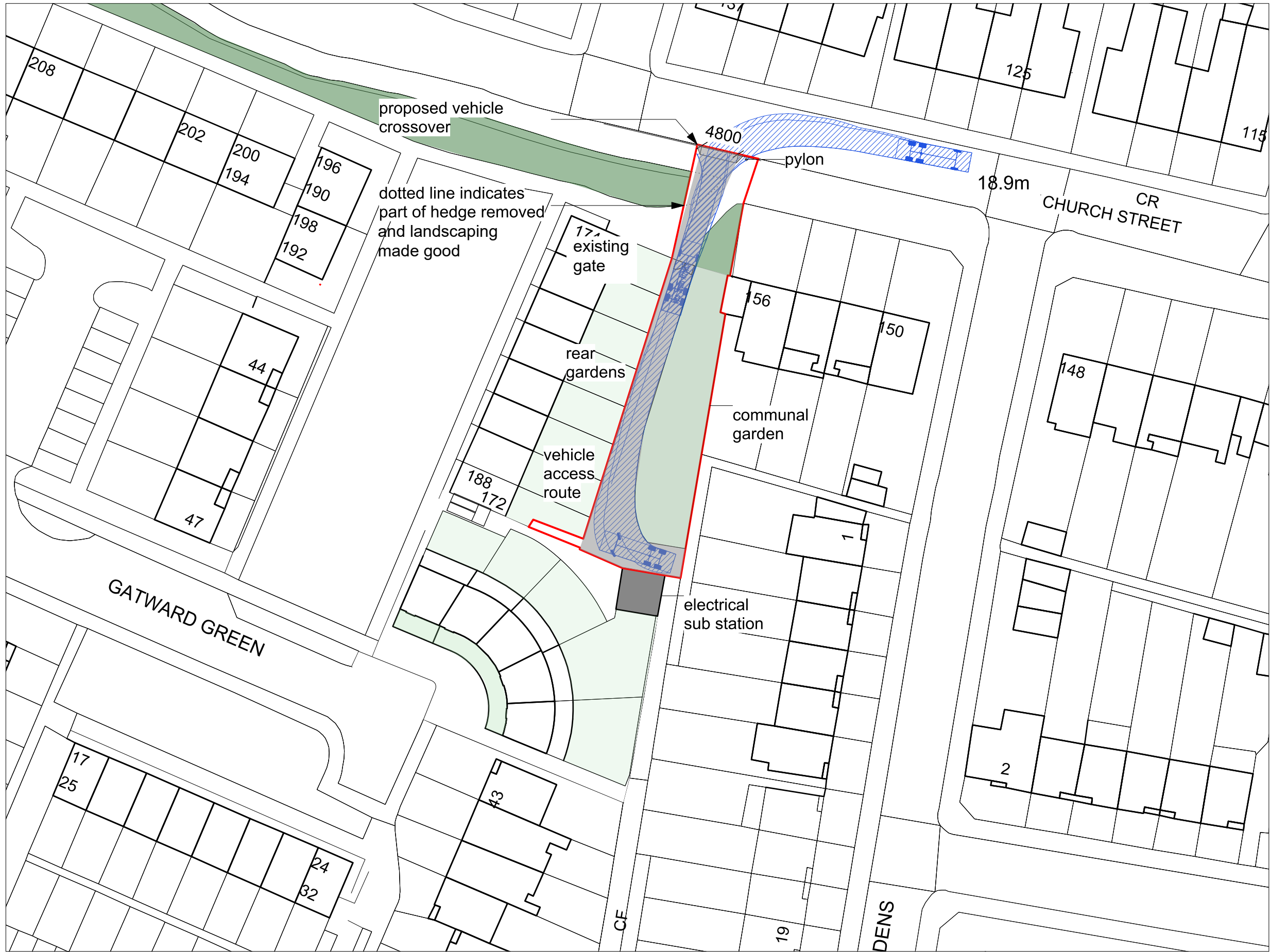
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Project No 16138

Title Client Project No

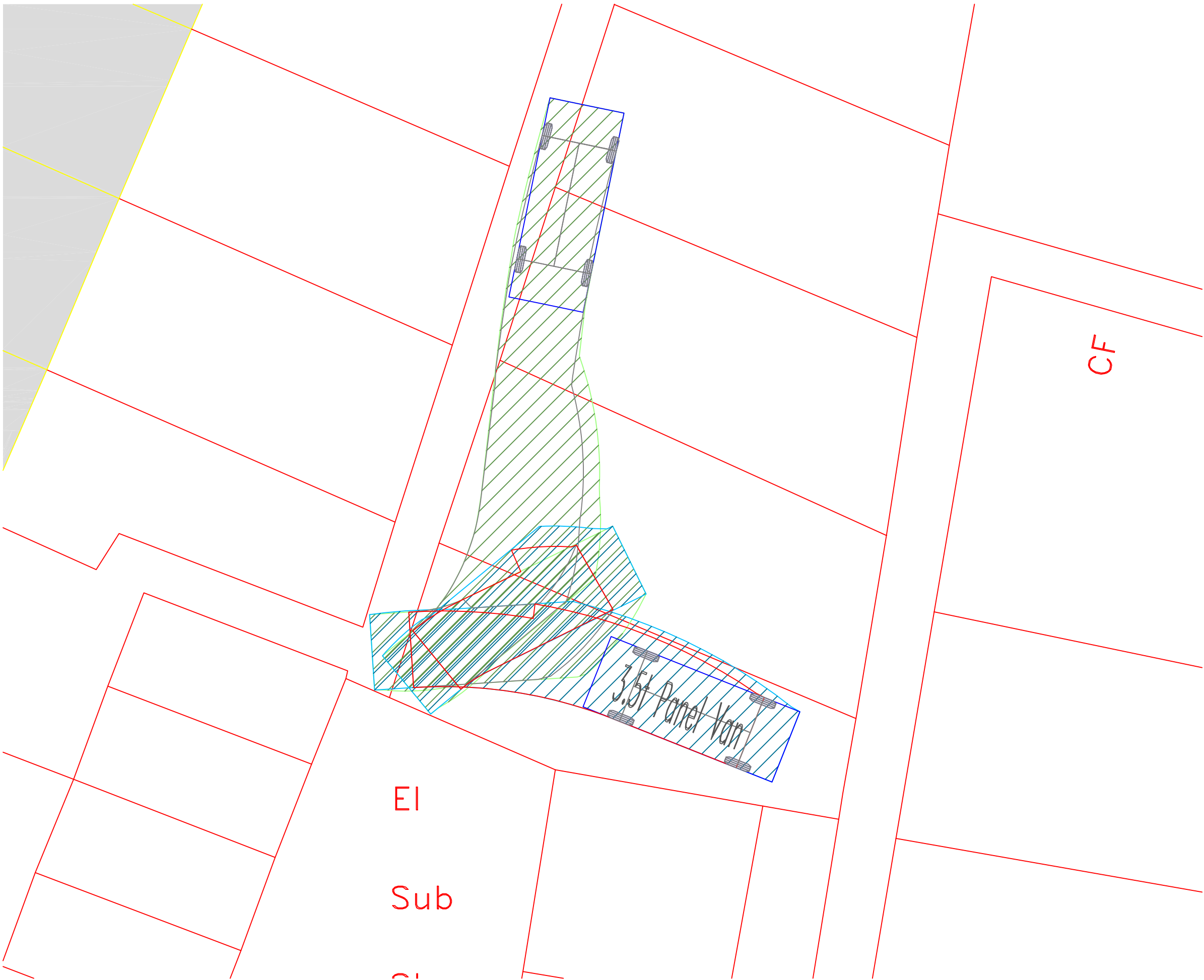
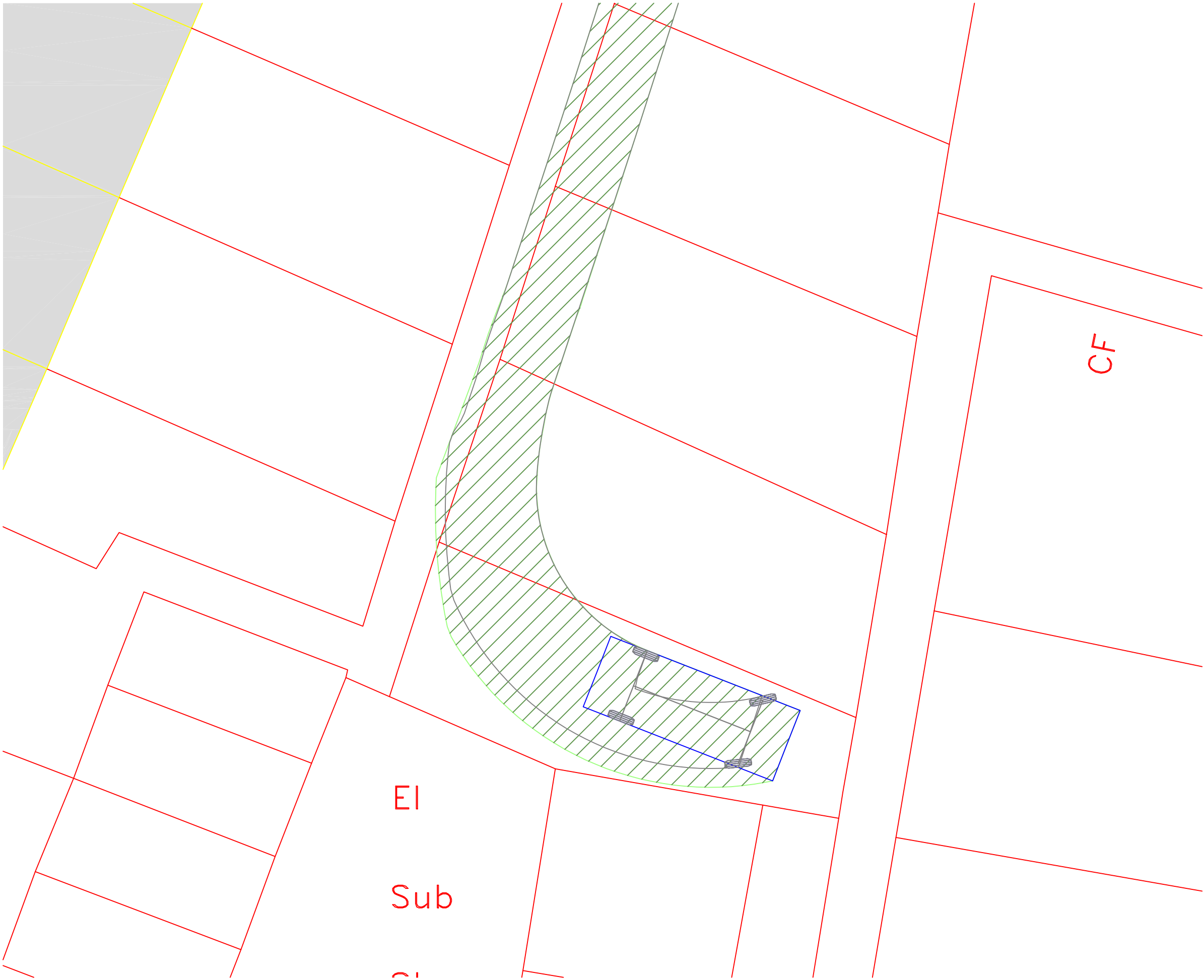
Vehicle swept-path analysis
access to electricity sub-station
- Iveco Stralis 26tonne

Drawing No 16138.OS.102.02



01	30.09.21			
Revision	Date	Status	Drawn by	Checked by

Client LBE Housing	
Project Name New vehicle crossover on Church Street	
Drawing Name Proposed Plan - swept path analysis	
Drawing Status PLANNING	
Scale 1:500 @ A3	Revision
Drawing Number GAT_P_01	



GENERAL NOTES

1. This drawing to be read in conjunction with all relevant civil engineering drawings.

LEGEND

Vehicle body Envelope (reverse)

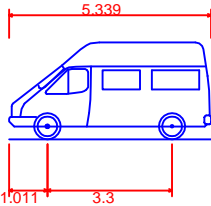
Vehicle wheel swept path

Vehicle body Envelope (forward)

Vehicle wheel swept path

Vehicle Chassis, shown at start & end of path and change of direction(forward).

Vehicle Chassis, shown at start & end of path and change of direction(reverse).



3.5t Panel Van

Overall Length

Overall Width

Overall Body Height

Min Body Ground Clearance

Track Width

Lock to Lock Time

Kerb to Kerb Turning Radius

5.339m

1.986m

2.565m

0.338m

1.986m

4.00s

6.400m

NOT FOR CONSTRUCTION

Rev	Date	Description	Drawn	Check
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5A Andrews Buildings

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Tel 029 2070 0924

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Drawing Status

PRELIMINARY

Project

Gatward Green, Enfield

Drawing No

16138.OS.102.05

Date

August 2016

Scale

1:100 @ A1

Drawn

ABR

Engineer

HLJ

Project No

16138

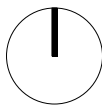
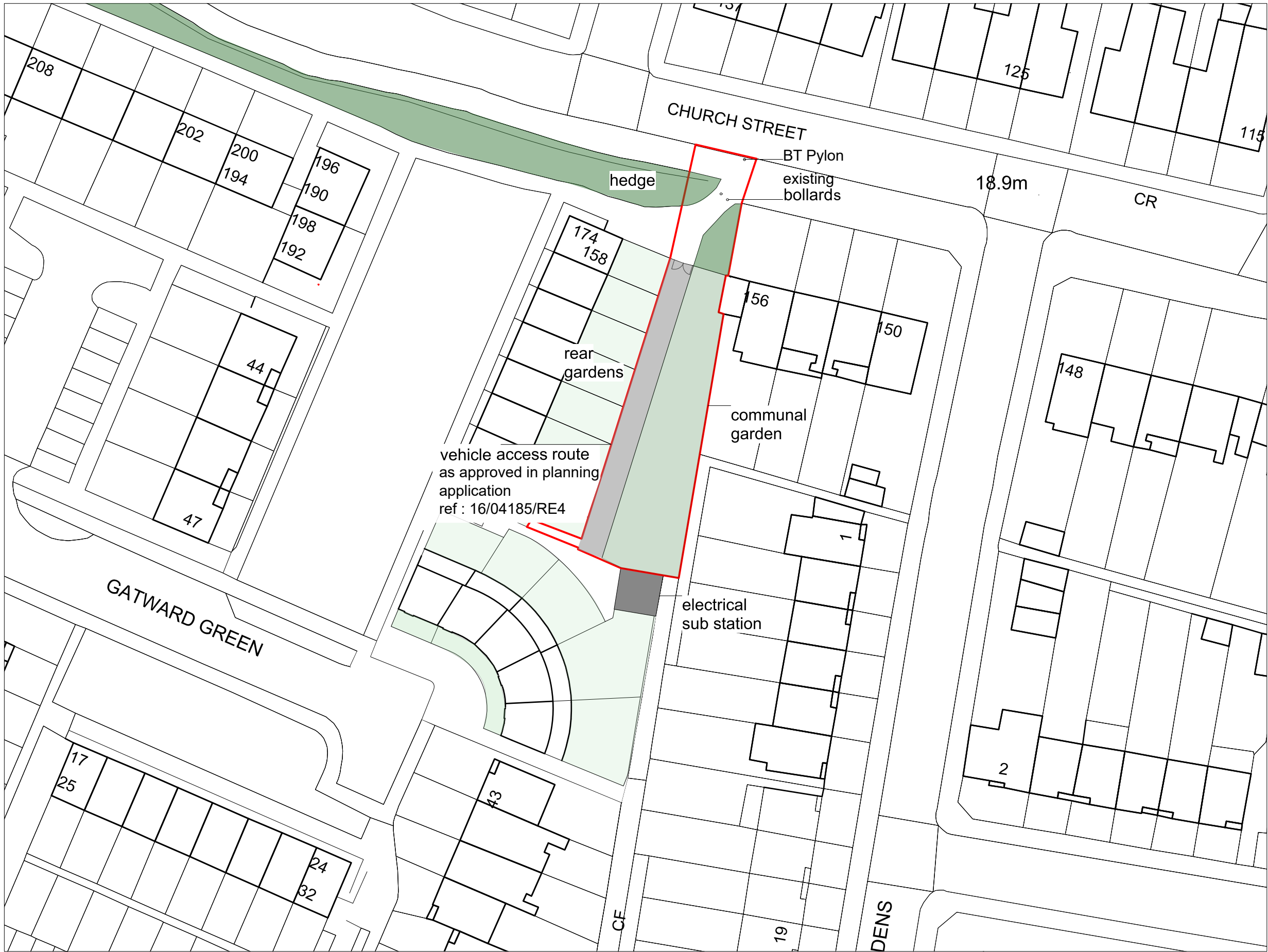
Client Project No

Revision

Vehicle swept-path analysis

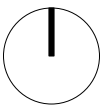
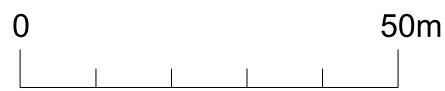
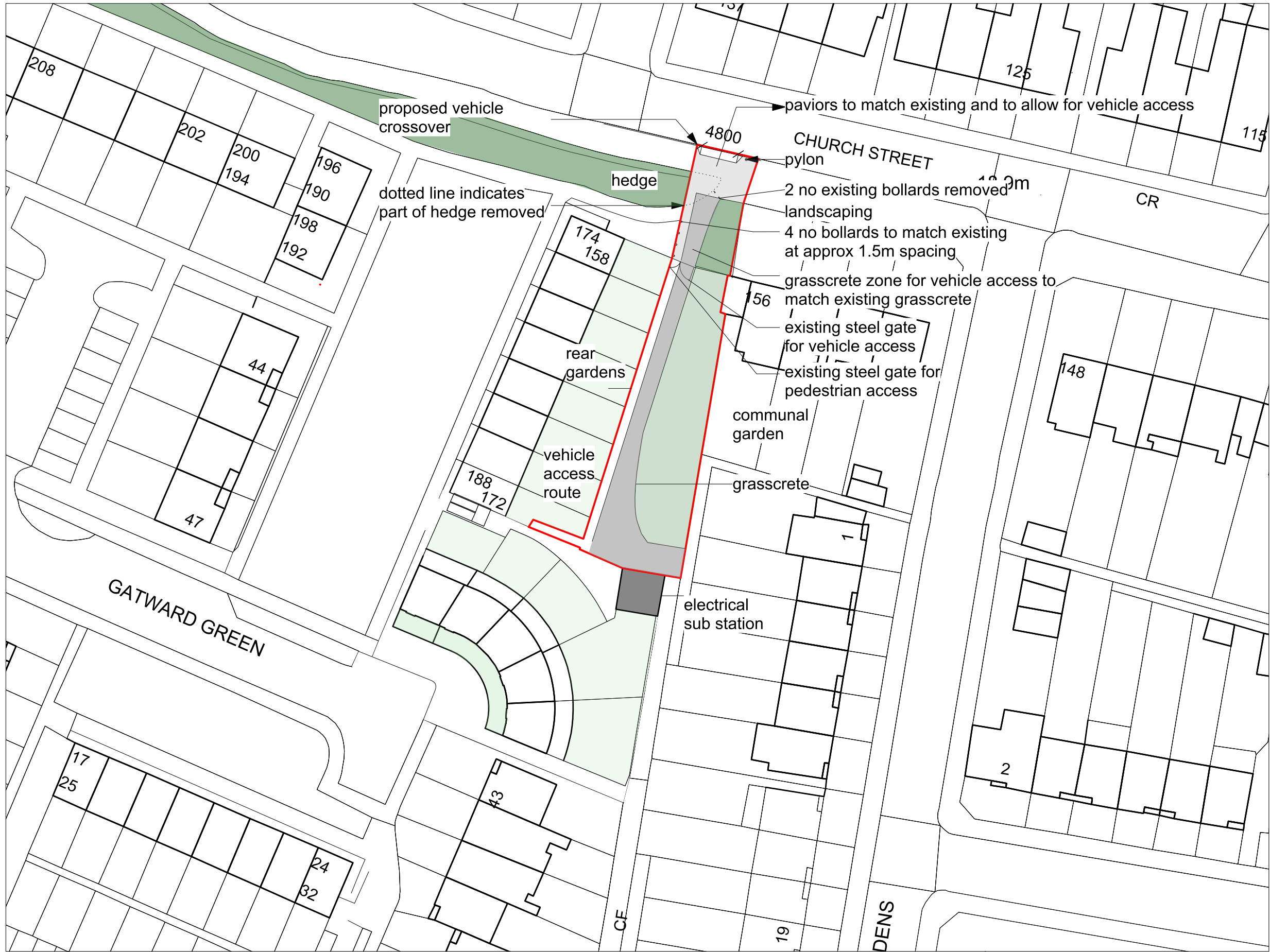
access to electricity sub-station

- 3.5tonne panel van



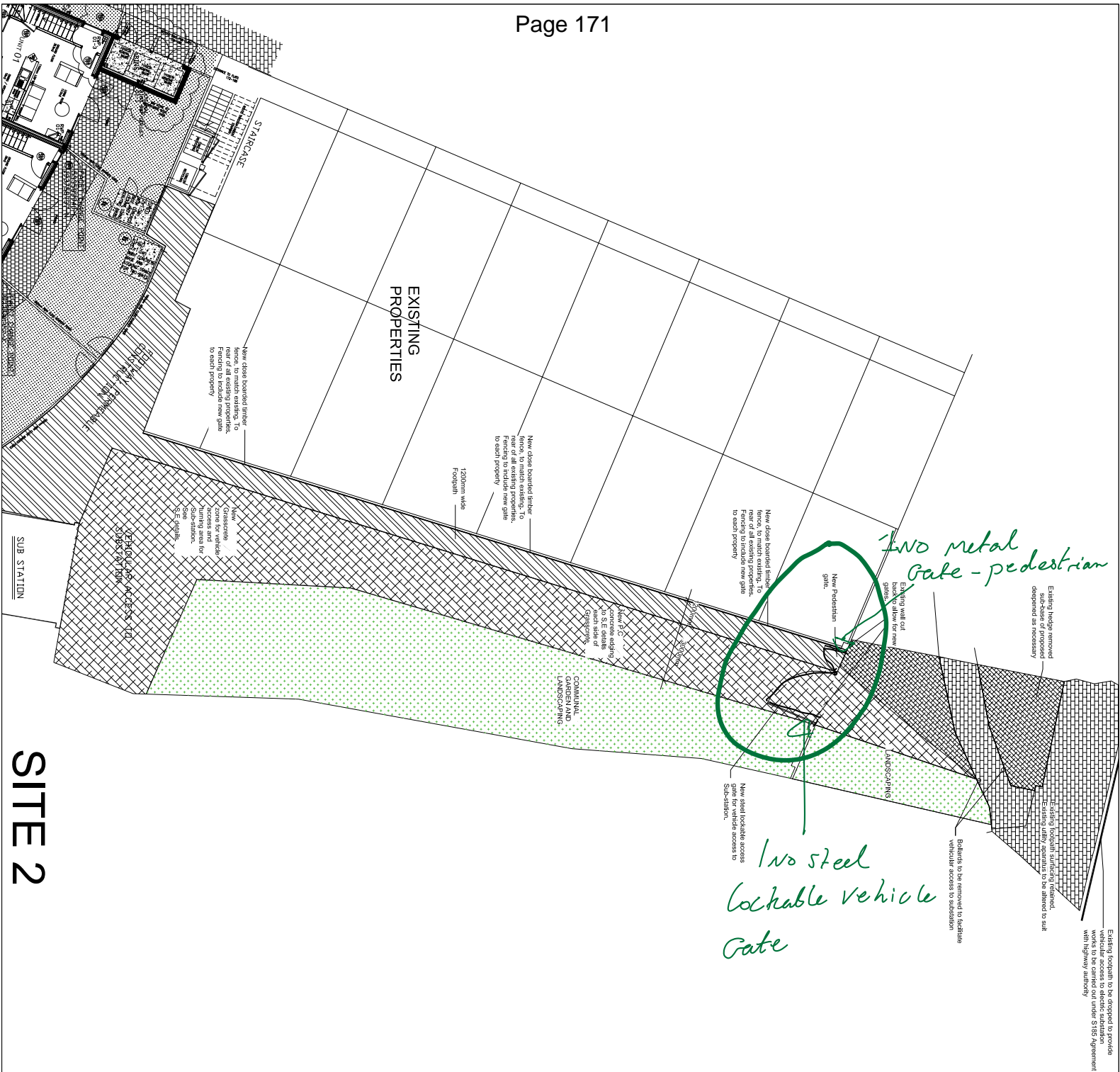
02	22.10.21			
Revision	Date	Status	Drawn by	Checked by

Client LBE Housing	
Project Name New vehicle crossover on Church Street	
Drawing Name Existing Plan	
Drawing Status PLANNING	
Scale 1.500 @ A3	Revision
Drawing Number GAT_E_01	



02	27.11.21			
Revision	Date	Status	Drawn by	Checked by

Client LBE Housing	
Project Name Gatward Green Vehicle Crossover	
Drawing Name Proposed Plan	
Drawing Status PLANNING	
Scale 1:500 @ A3	Revision
Drawing Number GAT_P_01	



SITE 2

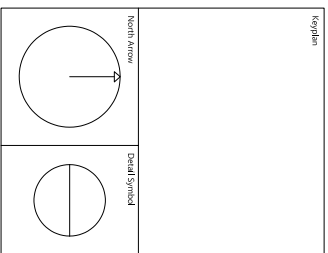
TO BE READ IN CONJUNCTION
WITH INGLETON WOOD EXTERNAL
WORKS AND LANDSCAPE DESIGN
DRAWINGS.
FOR CONTINUATION OF SITE PLAN
AND SETTING OUT RELATING TO
SITE 2 PROPERTIES REFER TO
NORR DRG SP-A-1000

DATE	REVISION	REV	DRN	CHK
15-02-21	Initial Issue	PA		DR

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An Ingenium International Company
Templeton House
156-165 Great Portland Street
London W1W 6PA
England, UK

Drawn	Date
PA	15-02-21
Checked	Date
PA	15-02-21
Scale 1:100 @ A1	

ARK BUILD

GATWARD GREEN HOUSING
SITE 2

Drawing Title

SITE 2 - PROPOSED SITE PLAN
SHEET 2

Drawing Title

CONSTRUCTION

Project No. **IAI-N 20001100**

SP-A-1001	C1
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