

# Public Document Pack



## PLANNING COMMITTEE

Tuesday, 8th March, 2022 at 7.30 pm  
Conference Room, Civic Centre, Silver  
Street, Enfield, EN1 3XA

Contact: Jane Creer / Metin Halil  
Committee Administrator  
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## MEMBERS

Councillors : Maria Alexandrou, Daniel Anderson, Kate Anolue, Mahym Bedekova (Vice-Chair), Sinan Boztas (Chair), Susan Erbil, Peter Fallart, 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](mailto: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. **21/01676/FUL - LAND TO THE REAR OF 18 WAGGON ROAD, HADLEY WOOD, BARNET, EN4 0HL** (Pages 3 - 56)

### RECOMMENDATION:

1. That the Head of Development Management be authorised to Grant planning permission subject to conditions.
2. That the Head of Development Management be authorised to make any alterations, additions or deletions to the recommended conditions as set out in this report.

WARD: Cockfosters

**5. 19/01988/FUL - ST MONICA'S HALL, 521 GREEN LANES, LONDON, N13 4DH (Pages 57 - 110)**

**RECOMMENDATION:**

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

WARD: Winchmore Hill

**6. 21/03694/FUL - WESTERN FIELDS, TOTTENHAM HOTSPUR TRAINING CENTRE, HOTSPUR WAY, ENFIELD, EN2 9AP (Pages 111 - 136)**

**RECOMMENDATION:**

1. That subject to the completion of a S106 to secure the matters covered in this report the Head of Development Management be authorised to grant planning permission subject to conditions.
2. That the Head of Development Management be granted delegated authority to agree / amend the final wording of the conditions to cover the matters in the Recommendation section of the report.

WARD: Chase

**7. 21/04271/RE4 - UPTON ROAD AND RAYNHAM ROAD, LONDON, N18 2LJ (Pages 137 - 202)**

**RECOMMENDATION:**

1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to no objections being received from the Environment Agency, the finalisation of a shadow S106 to secure the matters covered in the report and to be appended to the decision notice, the Head of Development Management be authorised to grant planning permission subject to conditions.
2. That the Head of Development Management be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of the report.

WARD: Upper Edmonton

**8. FUTURE MEETING DATES**

Future meetings of the Planning Committee will be:

- 22 March 2022
- 5 April 2022 – Provisional
- 26 April 2022



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**MUNICIPAL YEAR 2021/2022**

**COMMITTEE:**  
 PLANNING COMMITTEE  
 08.03.2022

AGENDA - PART 1	ITEM 3
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SUBJECT -
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MISCELLANEOUS MATTERS
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**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

### **3.1 APPLICATIONS DEALT WITH UNDER DELEGATED POWERS INF**

3.1.1 In accordance with delegated powers, 115 applications were determined between 14/02/2022 and 25/02/2022, of which 95 were granted and 20 refused.

3.1.2 A Schedule of Decisions is available in the Members' Library.

#### Background Papers

To be found on files indicated in Schedule.

### **3.2 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:** 22 February 2022**Report of Head  
of Planning -  
Vincent  
Lacovara****Contact Officer:**  
Andy Higham  
David Gittens  
Fidel Miller**Ward:**  
Cockfosters**Ref:** 21/01676/FUL**Category:** Full Planning Application**LOCATION:** Land to the rear of 18 Waggon Road, Hadley Wood, Barnet, EN4 0HL**PROPOSAL:** Erection of a detached 2-storey dwelling at rear incorporating accommodation in roof space together with new access road, associated parking and landscaping.**Applicant Name & Address:**Mr Mo Abbassi  
18 Waggon Road  
Barnet  
EN4 0HL**Agent Name & Address:**Mr Owen Argent  
Argent Architects  
Penally  
Tenby  
SA70 7PU**RECOMMENDATION:**

1. That the Head of Development Management be authorised to GRANT planning permission subject to conditions
2. That the Head of Development Management be authorised to make any alterations, additions or deletions to the recommended conditions as set out in this report

Ref: 21/01676/FUL    **LOCATION: Land To The Rear Of 18 Wagon Road, Hadley Wood, Barnet, EN4 0HL**





**1. Note for Members**

- 1.1 Although this application is categorised as a minor planning application and could be determined under delegated authority, it is reported to Planning Committee in light of the level of local interest and the fact that an application for similar development on this site was determined at Planning Committee in August 2021

**2. Recommendation:**

- 2.1 That the Head of Development Management be authorised to GRANT planning permission subject to the following planning conditions:

1. Time Limited Permission
2. Approved Plans
3. Obscure Glazing
4. Replacement Trees
5. Tree Protection
5. Materials
6. Hard Surfacing
7. Biodiversity and Landscaping
8. Energy Statement
9. Vehicle Charging
10. Cycle Parking
11. Refuse
12. Water
13. Energy Performance Certificate
14. Construction Management Plan
15. SuDS

Informatives

1. Refuse
2. Cycles
3. Thames Water

- 2.2 It is also requested that authority to finalise the wording of conditions under the above headings, is given to officers to ensure they reflect any issues raised by Planning Committee and / or any reported updates to the meeting.

**3.0 Executive Summary:**

- 3.1 The report provides an assessment against policy of the proposal comprising the erection of a new detached dwelling. The host property contains an existing dwelling with a large rear garden.

- 3.2 Surrounding development contains a diverse set of residential development in terms of design, scale, and age, but generally could be described as larger detached dwellings of a traditional style situated in generous residential plots.
- 3.3 As noted in the report below, a very similar development has been proposed previously and refused planning permission. The single reason for refusal related to sustainable drainage. The current proposal has responded to the previous reason for refusal, as well as feedback provided during the course of review of the subject application. The changes are primarily to access, servicing, and sustainable drainage.
- 3.4 The relevant planning history has been taken into consideration in the review of the current development proposal. It is considered that the full planning application satisfies overarching planning policy and is considered to be acceptable subject to pre-commencement and pre-occupation planning conditions applied to the site.

#### **4. Site and Surroundings**

- 3.1 The application site contains a two-storey detached dwelling on the south side of Waggon Road. The large rear garden abuts Monken Mead Brooke. The application site is not located within a conservation area nor does it contain a listed building. Designated Green Belt land is to the north of the site, across Waggon Road.
- 3.2 The surrounding area is predominantly residential with detached dwellings situated on large plots.
- 3.3 The site has a PTAL 1a designation, representing very poor access to public transportation services. There is existing vehicle access to Waggon Road.

#### **4. Proposal**

- 5.1 Permission is sought for the Erection of a detached 2-storey dwelling at rear incorporating accommodation in roof space together with new access road, associated parking and landscaping.
- 5.2 Planning permission has been previously refused under ref. 20/03673/FUL (see relevant history section below) for the following reason:

*01. The proposed development, in the absence of a flood risk assessment and sustainable drainage strategy, fails to demonstrate how proposed measures would manage the risk of flooding from surface water runoff and groundwater flooding, or follow the drainage hierarchy in the London Plan. As such, the proposal is contrary to Policies 5.3 and 5.13 of the London Plan (2016), Policy CP 28 of the Enfield Core Strategy (2010), and Policies DMD 59, DMD 60,*

*DMD 61, and DMD 62 of the Enfield Development Management Document (2014).*

- 5.3 The current proposal seeks to overcome the reason for refusal by supplying new information.

## **5. Relevant Planning History**

- 5.1 The following application references are considered relevant to the proposal (not a complete history).

Application Site – No. 18

- 5.2 18/01591/OUT – Granted with Conditions – 09/10/2019: Principle of sub-division of residential use on site; formation of vehicular access to the rear and landscaping (All other matters Reserved).
- 5.3 19/01147/HOU – Granted with Conditions – 09/01/2020: Part single, part 2-storey rear extension and two storey front extension, alterations to roof to provide habitable room with rear window and rooflights.
- 5.4 20/03271/VAR – Refused – 18/12/2020: Variation of Ref: 19/01147/HOU Condition number 2 to replace the timber cladding with full glazing wall in front and side elevations, alter the roof form of the two storey rear extension and two storey front extension, remove a chimney stack, introduce rooflights, introduce new windows in eastern and western side elevations, and allow alteration to fenestration and internal reconfiguration.
- 5.5 20/03673/FUL – Refused – 01/02/2021: Erection of a detached 2-storey dwelling at rear incorporating accommodation in roof space together with new access road, associated parking and landscaping.
- 5.6 21/00660/VAR – Granted with Conditions – 29/04/2021: Variation of Ref: 19/01147/HOU Condition number 2 to replace the timber cladding with glazing wall in front and side elevations, alter the roof form of the two storey rear extension and two storey front extension, remove a chimney stack, introduce rooflights, introduce new windows in western side elevation, and allow alteration to fenestration and internal reconfiguration.

Nos. 18 -22 Wagon Road

- 5.7 15/04916/FUL – Refused – 22/10/2020: Redevelopment of site and demolition of existing house to provide 4 x 6-bed detached single family dwelling houses with attached garages and rooms in roof, new access road from Waggon Road and associated landscaping. Amended drawings received April 2017

- 5.8 20/00112/REFUSE (APP/Q5300/W/20/3256487) – Appeal Dismissed – 30/03/2021: Appeal of ref 15/04916/FUL above.

No. 32 Waggon Road

- 5.9 18/00646/FUL – Refused – 23/10/2020: Sub-division of site, demolition of the existing property and erection of 3 x 5 bed and 1 x 6 bed detached dwelling houses, including landscaping, parking, new access from Waggon road and four (4) detached vehicle garages.
- 5.10 20/00206/REFUSE (APP/Q5300/W/20/3266015) – Appeal Dismissed – 07/06/2021: Appeal of ref 18/00646/FUL above.

**7. Consultations**

Internal

- 7.1 Crossover Teams: Noted there is an existing crossover and a tree near to it.
- 7.2 Education: No comments received. Any comment received will be reported at the meeting.
- 7.3 Environmental Health: No objections.
- 7.4 SuDS: Requested a SuDS-related condition be added to any grant of planning permission, which has been included below.
- 7.5 Transportation: Comments received regarded the crossover, access, car and cycle parking, and refuse collection. These matters are addressed in this report below.

External

- 7.6 Duchy of Lancaster: No response received. Any comment received will be reported at the meeting.
- 7.7 Thames Water: Provided standing comments and requested that an informative be added to any grant of planning permission, which have been included below.

Public

- 7.8 Notification was sent to 20 surrounding properties (21 days expired 23 May 2021). A total of 19 representations were received, some from the same individual(s).

7.9 The main issues of objection are summarised below, and only those material issues will be addressed in each respective section of this report as needed:

- Affect local ecology
- Close to adjoining properties
- Conflict with local plan
- Development too high
- General dislike of proposal
- Inadequate access
- Increase danger of flooding
- Increase in traffic
- Increase of pollution
- Loss of light
- Loss of privacy
- Loss of trees
- More open space needed on development
- Noise nuisance
- Out of keeping with character of area
- Over development
- Impact to wildlife
- Light pollution

7.10 Comments received that are material planning considerations have been considered and addressed in this report where needed.

## **8. Relevant Policies**

8.1 Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions 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.

### London Plan (2021)

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

GG2: Making the best use of land

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  
D12: Fire safety  
H1: Increasing housing supply  
H2: Small sites  
H10: Housing size mix  
G6: Biodiversity and access to nature  
G7: Trees and woodlands  
SI 2: Minimising greenhouse gas emissions  
SI 5: Water infrastructure  
SI 7: Reducing waste and supporting the circular economy  
SI 12: Flood risk management  
SI 13: Sustainable drainage  
T5: Cycling  
T6: Car parking  
T6.1: Residential parking  
T9: Funding transport infrastructure through planning

Core Strategy (2010)

- 8.3 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. The following is considered particularly relevant:

CP 4: Housing Quality  
CP 5: Housing Types  
CP 20: Sustainable Energy Use and Energy Infrastructure  
CP 21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure  
CP 22: Delivering Sustainable Waste Management  
CP 25: Pedestrians and cyclists  
CP 28: Managing Flood Risk Through Development  
CP 30: Maintaining and Improving the Quality of the Built and Open Environment

8.4 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:

DMD 3: Providing a Mix of Different Sized Homes  
DMD 6: Residential Character  
DMD 7: Development of Garden Land  
DMD 8: General Standards for New Residential Development  
DMD 9: Amenity Space  
DMD 10: Distancing  
DMD 37: Achieving High Quality and Design-Led Development  
DMD 38: Design Process  
DMD 45: Parking Standards and Layout  
DMD 46: Vehicle Crossovers and Dropped Kerbs  
DMD 47: Access, New Roads and Servicing  
DMD 49: Sustainable Design and Construction Statements  
DMD 51: Energy Efficiency Standards  
DMD 53: Low and Zero Carbon Technology  
DMD 56: Heating and Cooling  
DMD 57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement  
DMD 59: Avoiding and Reducing Flood Risk  
DMD 60: Assessing Flood Risk  
DMD 58: Water Efficiency  
DMD 61: Managing Surface Water  
DMD 68: Noise  
DMD 79: Ecological Enhancements  
DMD 80: Trees on Development Sites  
DMD 81: Landscaping  
DMD 83: Development Adjacent to the Green Belt

#### 8.5 Other relevant Policy/Guidance

National Planning Policy Framework (NPPF)  
National Planning Practice Guidance (NPPG)  
DCLG Technical Housing Standards – Nationally Described Space Standard (2015)  
London Housing SPG (2016)  
Enfield Revised Technical Standards for Footway Crossovers (2013)  
Enfield Waste and Recycling Storage Planning Guidance (2020)

#### Housing Delivery Test and 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 (7), 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 (6); 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 (7) 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 73); 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 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.
- 8.9 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 we 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 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) where there are no relevant development plan policies or the policies which are most important are deemed to be ‘out of date’, the presumption should be in favour of approving development. 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.

## **9. Analysis**

### Principle of Development

- 9.1 A proposal that delivers an increase in available residential properties albeit in this case a single unit, is welcome and would be consistent with the thrust of Government policy and the adopted development plan. All residential development has the potential to contribute towards London-wide and Borough strategic housing targets, which is an important consideration in light of the Housing delivery test and the current status of the Council having to apply the presumption in favour of approving sustainable development and the tilted balance. Nevertheless, it is important that the proposal provides quality accommodations and amenities and provide an appropriate mix of housing, while not adversely impacting neighbouring properties, the context and character of the wider area, infrastructure, services, and the environment.
- 9.2 Policy H1 of the London Plan promotes the optimisation of sites to deliver housing while Policy H10 of the London Plan encourages the Council to provide a range of housing choices in order to take account of the various groups who require different types of housing. The proposal would be compatible with these policies, as well as Policy CP 2 of the Core Strategy and Policy DMD 3 of the Development Management Document, insofar as it would add to the Borough’s housing stock.
- 9.3 Insofar, as the development would contribute to the delivery of a new home, the principle of development is accepted. However, it is important that consideration is given to the relevant policies within the Enfield Core Strategy and Development Management Document that seek to protect the residential amenities of the neighbouring and future occupants, ensure development is in keeping with the

character of the area, ensure adequate internal floorspace and external amenity space, and have suitable access. The acceptability of the proposal against these considerations is discussed in more detail below referencing the assessment of the previous proposal against these same issues.

#### Green Belt

- 9.4 The boundary with the green belt runs along the northern boundary of Waggon Road. Policy DMD 83; Development Adjacent to the Green Belt, states that proposed development located next to or within close proximity to the green belt will only be permitted if the development does not result in any adverse impact to the openness of the adjacent green belt land. The proposed development would not be visible from the green belt and therefore would have no impact on its openness.

#### Development on Garden Land

- 9.5 Policy DMD 7 states:

*The Council seeks to protect and enhance the positive contribution gardens make to the character of the Borough. Development on garden land will only be permitted if all of the following criteria are met:*

- a. The development does not harm the character of the area;*
- b. Increased density is appropriate, taking into account the site context in terms of its location, accessibility and the provision of local infrastructure;*
- c. The original plot is of a sufficient size to allow for additional dwellings which meet the standards in DMD 8 'General Standards for New Residential Development', (and other design policies);*
- d. The individual plot sizes, orientation and layout created are appropriate to, and would not adversely impact on the residential amenity within the development, or the existing pattern of development in that locality;*
- e. An adequate amount of garden space is retained within both of the individual plots in accordance with the minimum amenity space standards (DMD 9 'Amenity Space'), and the role of each space is enhanced to contribute towards other plan objectives such as biodiversity; green corridors and networks; flood risk; climate change; local context and character; and play space; and*
- f. The proposals would provide appropriate access to the public highway.*

- 9.6 The proposal is considered to demonstrate alignment with the above policy, much of its content is addressed by other policies discussed in this report.

#### Impact on the Character of the Surrounding Area

- 9.7 Policy CP 30 of the Core Strategy requires new development to be of a high-quality design and in keeping with the character of the surrounding area. Policy DMD 6 requires development to be appropriate for the existing pattern of development and setting.
- 9.8 Policy DMD 8 seeks to ensure that development is high quality, sustainable, has regard for and enhances the local character, can meet the existing and future needs of residents, and protects residential amenity for neighbouring residents.
- 9.9 Policy DMD 37 sets out criteria for achieving high quality and design led development, and resists development that is inappropriate to its context or fails to have appropriate regard to its surroundings.
- 9.10 No. 18 Waggon Road sits within a large plot which is typical of the spacious residential plots fronting the south side of Waggon Road. An established back land development has been built out across the rear of Nos. 8-16 Waggon Road and No. 1 Sandridge Close, which is accessed from Sandridge Close.
- 9.11 The surrounding development contains a diverse range of dwellinghouses in terms of design, scale, and age, with no predominant form, but the designs could generally be described as traditional and characterised by larger detached dwellings set back from the road. The proposed features, materials, and design would be more contemporary than surrounding development but complementary in terms of size and design. A condition has been included to require review of exterior finishing materials prior to construction commencing.
- 9.12 The two-storey height would be considered acceptable considering the surrounding development is two storeys. The roof slopes and height are similar to adjacent development on Warner Close. In terms of character, the proposed intensification of residential use on the site would be acceptable. This is due to the large size of the plot, the presence of the existing adjacent back land development, and the distance from the Green Belt boundary.
- 9.13 It is noted that character impact to the surrounding area did not form a previous reason for refusal.

#### Standard of Accommodation

- 9.14 Policy DMD 8 of the Development Management Document and Policy D6 of the London Plan set minimum internal space standards for residential development. The Nationally Described Space Standards applies to all residential developments within the Borough. The London Plan Housing SPG adopted in 2016 has been updated to reflect the Nationally Described Space Standards.

*Floor Area*

- 9.15 The housing and space standards provides internal floorspace expectations for new development illustrated in the table below. Additionally, it describes minimum space standards for bedrooms:
- b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
  - c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m<sup>2</sup> and is at least 2.15m wide
  - d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m<sup>2</sup>
- 9.16 The new 5-bed dwelling would be expected to accommodate up to 10 people and would need to meet the following minimum requirements: 5 x 11.5m<sup>2</sup> (double) bedroom and more than 134m<sup>2</sup> Gross Internal Area (GIA).
- 9.17 The proposed GIA is approximately 375m<sup>2</sup> and the proposed and expected bedroom floorspaces are shown in the table below. In accordance with these bedroom size standards and the plans submitted with this application, the new dwelling would meet the minimum area requirements.

<b>Bedroom</b>	<b>Expected</b>	<b>Proposed</b>
1	2p / 11.5m <sup>2</sup>	50.6m <sup>2</sup>
2	2p / 11.5m <sup>2</sup>	20.2m <sup>2</sup>
3	2p / 11.5m <sup>2</sup>	18.1m <sup>2</sup>
4	2p / 11.5m <sup>2</sup>	31.4m <sup>2</sup>
5	2p / 11.5m <sup>2</sup>	14.4m <sup>2</sup>

*Amenity Space Standards*

- 9.18 Policy DMD 9 and Policy D6 of the London Plan requires new development to provide good quality amenity space that is not significantly overlooked by surrounding uses. Private amenity space is defined as open space which is accessible to the resident(s) of the dwelling and does not include space used for purposes such as access roads, driveways, garages, car parking spaces, outdoor storage areas; or landscaped areas which provide a setting for the development such as front gardens.
- 9.19 DMD 9 does not specify a minimum size for outdoor amenity area for a 5-bedroom dwelling, but a 4-bedroom, 6-person dwelling would require at least 50m<sup>2</sup>. The proposal includes relatively large front and rear gardens, as well as a patio. As such, the provided amenity areas are acceptable.

- 9.20 It is noted that the standard of accommodation did not form a previous reason for refusal.

#### Impact on the Neighbouring Amenity

- 9.21 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 8 states that new developments should preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise, and disturbance.
- 9.22 As discussed above, the proposed development follows the pattern of adjacent residential development. Although there were objections to the amount of proposed glazing, it would not seem to result in projecting light onto neighbouring properties to a level resulting in harm to neighbouring amenities. A new residential unit could be expected to result in some degree of additional noise. However, the potential increase in noise would be acceptable given the residential nature of the area. Therefore, the proposed development would not unacceptably impact the residential amenities (privacy, outlook, daylight, and sunlight) appurtenant to the neighbouring properties.
- 9.23 Two windows within the first-floor flank elevation serve bathrooms and these would be expected to be obscure-glazed and non-opening below a certain height, and a condition can ensure this.
- 9.24 Therefore, as proposed and conditioned, it is considered that the development would not significantly impact the residential amenities (noise, privacy, outlook, daylight, and sunlight) appurtenant to the host site or neighbouring properties.
- 9.25 It is noted that amenity impacts did not form a reason for refusal in the previous application.

#### Vehicle Parking and Cycle Provisions

##### *Vehicle Parking and Access*

- 9.26 Policy DMD 8 requires new residential development to provide adequate parking while DMD 45 seeks to minimise car parking and to promote sustainable transport options. The Council recognises that a flexible and balanced approach

needs to be adopted to prevent excessive car parking provision while at the same time recognising that low on-site provision sometimes increases pressure on existing streets. Policy DMD 45 states:

Car parking proposals will be considered against the standards set out in the London Plan and:

- a. The scale and nature of the development
- b. The public transport accessibility (PTAL) of the site;
- c. Existing parking pressures in the locality;
- d. Accessibility to local amenities, and the needs of the future occupants of the developments.

9.27 Table 10.3 of the London Plan (2021) sets out parking standards for different land uses. The site has a Public Transport Accessibility Level (PTAL) of 1a which indicates that access to frequent public transport is very poor. The maximum parking limit would be 1.5 spaces, however, additional parking can be considered if it contributes towards the provision of larger family housing.

9.28 It is noted that transportation, access, and parking did not form a reason for refusal in the previous application.

9.29 The proposal involves the provision of 2 car parking spaces accessed from the existing crossover with a new access drive to the proposed dwelling. The hardstanding at the front of the existing house would be slightly widened, in order to provide better manoeuvrability for private and emergency vehicles.

9.30 Consultation comments received from the Council's Transportation team raised no objections to the level of parking provided or following clarification to the design and layout specification of the vehicle access.

9.31 Policy T6.1 of the London Plan requires that all residential parking spaces must provide at least 20% of the spaces with active vehicle charging facilities, with passive provisions for all other spaces. Rounded up, this would mean one parking space requires active charging facilities. A condition has been included to secure this.

#### Cycle Parking

9.32 A total of 2 long stay cycle parking spaces are required for the proposed development. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycle Design Standards (e.g. covered, secured, lit, etc.).

- 9.33 The applicant has provided plans that indicate a location for a cycle store, but no future details of the design were given. A condition has been included to ensure adequate cycle storage.

#### Refuse Storage

- 9.34 Policy DMD 47 specifies that new development will only be permitted where adequate, safe, and functional provision is made for refuse collection. Policy DMD 57 requires all new development to make appropriate provision for waste storage, sorting and recycling, and adequate access for waste collection. The Waste and Recycling Storage Planning Guidance from Enfield Council (EN20/V2) provides further specifications.
- 9.35 A location to store bins near the new house has been indicated on the plans, along with provision for bins towards the front of the property within serviceable distance of the road, but no further details have been given. However, compliance can be ensured by way of a condition.

#### Energy and Water Efficiency

- 9.36 Policy DMD 49 states all new development must achieve the highest sustainable design and construction standards and include measures capable of mitigating and adapting to climate change to meet future needs having regard to technical feasibility and economic viability. Policy DMD 51 states further energy efficiency standards and that all developments will be required to demonstrate how the proposal minimises energy related CO<sub>2</sub> emissions which must adhere to the principles of the energy hierarchy in the policy.
- 9.37 This follows Policy CP 20 of the Core Strategy which states that the Council will require all new developments, and where possible via retrofitting process in existing development to address the causes and impacts of climate change by: minimising energy use; supplying energy efficiently; and using energy generated from renewable sources in line with the London Plan and national policy. The adopted policies require that new developments achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability.
- 9.38 The applicant has not proposed any specific materials, appliances, or fixtures that would conserve energy. For minor developments, the greatest possible CO<sub>2</sub> savings above the Part L of Building Regulations (2010) must be achieved. Therefore, a condition has been added requiring a detailed Energy Statement. The Energy Statement should outline how the reductions are achieved via the use of fabric energy efficiency performance, energy efficient fittings, use of renewable technologies, etc. in line with DMD 49 and 51.

- 9.39 Water efficiency measures need to demonstrate reduced water consumption using water efficient fittings, appliances, and recycling systems to show consumption equal to or less than 105 litres per person per day in accordance with the standards of Policy DMD 58 and the London Plan. Compliance can be ensured by a condition.

Sustainable Drainage Systems (SuDS)

- 9.40 Policy DMD 61 states that a drainage strategy will be required for all development to demonstrate how proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan. The policy ensures a development such as the one proposed should seek to achieve greenfield run off rates and must maximise the use of SuDS by including at least one 'at source' SuDS measure resulting in a net improvement in water quality.
- 9.41 This was the identified concern when refusing planning permission previously. The provision and design of the SuDs mitigation schemes has been the subject of discussion with officers with more information requested by officers to inform the drainage strategy. AS a result of these discussions and additional information, the SuDs team have confirmed on the basis of the technical data, that the drainage and flood risk management is acceptable.
- 9.42 Drainage and flood risk formed the only previous reason for refusal, and with the reports provided along with the recommended condition, it is considered that this reason is now addressed. With conditions, it is considered that the proposed development complies with relevant policies addressing drainage and flooding.

Trees

- 9.43 Policy DMD 80 states development that involves the loss of or harm to trees protected by a TPO or trees of significant amenity or biodiversity value will be resisted. There are no TPO trees within or near the application site. A tree survey report has been submitted.
- 9.44 The proposal includes the felling of 5 trees, 3 are class B (T12, T13, 13A) and 2 are class A (T23, T24). Class A and B trees are generally worth conserving, however, if they are removed, DMD 80 requires adequate replacements to be provided.
- 9.45 Due to the layout of the site and location of the trees, it is considered the removal of the 5 trees is warranted. However, as required by policy, these trees must be replaced with suitable trees on the site. A condition will require a detailed plan for replacement of these trees.
- 9.46 Trees to be retained must also be protected from any works occurring on site. A condition can ensure that standardised tree protection practices are implemented



on site by requiring a Tree Protection Plan to be submitted prior to construction commencing.

- 9.47 It is noted that the previous appeal decision did not include loss of trees as a reason for dismissal.

#### Biodiversity

- 9.48 The London Plan and the adopted Core Strategy and DMD seek to protect and enhance biodiversity. Policy DMD 79 states that developments resulting in the creation of 100m<sup>2</sup> or more floorspace or the creation of a new dwelling should provide on-site ecological enhancements. Policy DMD 81 states that development must provide high quality landscaping that enhances the local environment. Most developments can provide ecological enhancements to improve the biodiversity offer on the site. Enhancements could range from anything such as bird boxes to wildlife friendly landscaping or green roofs, depending on the scale of development.
- 9.49 These policies apply to the proposal as it would result in the net gain of 1 dwelling unit and over 100m<sup>2</sup> of floor space. The plans for the development incorporate a landscaping scheme although at this stage, no specific plantings or species are identified. Furthermore, no specific ecological improvements are identified. As a result, it is recommended that conditions including a condition requiring a biodiversity / ecological strategy, are imposed to ensure compliance with policy.

#### Construction Management

- 9.50 The applicant has not submitted a Construction Management Plan. It would be expected for a CMP to be a reasonable condition, and should address delivery and storage of materials, hours of work, dust mitigation, road cleaning, construction vehicle wheel washing, etc. The Council needs to ensure that the development can be implemented without being detrimental to amenities or the safe and efficient operation of the highway network in the local area. CMP are used to demonstrate how development will minimise impacts from the movement of goods and materials during the construction process.
- 9.51 As such, a condition will ensure a CMP is submitted to the Council for review prior to construction commencing.

### **10. Community Infrastructure Levy (CIL)**

- 10.1 The London Borough of Enfield falls within Mayoral Community Infrastructure Levy Band 2 and therefore development will be liable to pay £60/sqm. The development site is also liable for the higher rate residential CIL payment of £120/sqm as per the adopted Community Infrastructure Levy Charging Schedule (2016). The

development is subject to both CIL rates above, which will be indexed pursuant to the applicable guidance.

## **11. Public Sector Equality Duty**

- 11.1 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.

## **12. Conclusion**

- 12.1 In the three years up to and including 2020 the London Borough of Enfield delivered 56% of its 2,328 homes target. This means that Enfield has failed to meet the Housing Delivery Test set out in the National Planning Policy Framework 2019, as set by central government. Per paragraph 11(d) of the NPPF, the relevant development plan policies should, therefore, be considered out of date and planning permission should be granted unless:
- I. the application of policies in [the NPPF] that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.
- 12.2 This assessment has been made first against the development plan policies and then against the NPPF, in line with s.70(2) of the Town and Country Planning Act 1990 (as amended) and s.38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which require that applications for planning permission are made in accordance with the provisions of the development plan unless material considerations indicate otherwise. Although not part of the development plan, the NPPF is a material consideration and sets out the presumption in favour of approving sustainable development and the tilted balance. Due to the Housing Delivery Test, significant weight needs to be given to the requirements of Para 11 of the NPPF.
- 12.3 Notwithstanding, there are policies in the development plan against which the proposal can be assessed to inform the judgement of acceptability. The above assessment against the development plan policies has produced the following conclusion:
- The proposal would provide 1 new family-sized dwelling with a good standard of living accommodation that would contribute to the housing stock in the borough.

- The proposed development is considered appropriate in form and design and would not result in detrimental harm to the character and appearance of the locality or the Green Belt.
  - The proposal would not cause any unacceptable harm upon highway safety or the flow of traffic in the locality.
  - The proposal, by virtue of their size, location and proximity would not harm the amenity of occupying and neighbouring residents.
  - The design and construction of the proposal would have appropriate regard to environmental sustainability issues including energy and water conservation, renewable energy generation, and efficient resource use, as ensured by the included conditions.
  - The proposal would retain and protect trees of amenity and biodiversity value, and replace 5 trees that are proposed to be removed.
  - The development would be appropriate and in accordance with relevant National and Regional Policy, Core Strategy and Development policies for the reasons noted above.
- 12.4 It must also be noted that the SuDs team have confirmed the acceptability of the sustainable drainage measures thereby addressing the previous reason for refusal.
- 12.5 Having regard also to the mitigation secured by the recommended conditions, it is considered the proposed development is acceptable when assessed against the suite of relevant planning policies. Moreover, in light of the tilted balance, it is considered there is no adverse effects that would outweigh the benefits of approving the development and that planning permission should be granted subject to conditions.



Page 24  
Planning and Transport  
PO Box 53, Civic Centre,  
Silver Street, Enfield,  
EN1 3XE  
TEL: 020 8379 1000  
FAX: 020 8379 3811  
Email: [development.control@enfield.gov.uk](mailto:development.control@enfield.gov.uk)

For office use only	
Applic. No.	<input type="text"/>
Date Received	<input type="text"/>
Fee	<input type="text"/>
Receipt No.	<input type="text"/>

## Application for Planning Permission, Town and Country Planning Act 1990

### Publication of applications on planning authority websites.

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

### 1. Site Address

Number	<input type="text"/>
Suffix	<input type="text"/>
Property name	<input type="text"/>
Address line 1	Land to the Rear of 18 Waggon Road
Address line 2	Hadley Wood
Address line 3	<input type="text"/>
Town/city	Barnet
Postcode	EN4 0HL

Description of site location must be completed if postcode is not known:

Easting (x)	527114
Northing (y)	198514

Description	<input type="text"/>
-------------	----------------------

### 2. Applicant Details

Title	Mr
First name	Mo
Surname	Abbassi
Company name	<input type="text"/>
Address line 1	18 Waggon Road
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Town/city	Barnet
Country	<input type="text"/>

## 2. Applicant Details

Postcode

Are you an agent acting on behalf of the applicant?  Yes  No

Primary number

Secondary number

Fax number

Email address

## 3. Agent Details

Title

First name

Surname

Company name

Address line 1

Address line 2

Address line 3

Town/city

Country

Postcode

Primary number

Secondary number

Fax number

Email

## 4. Site Area

What is the measurement of the site area? (numeric characters only)

Unit

## 5. Site Information

### Title number(s)

Please add the title number(s) for the existing building(s) on the site. If the site has no title numbers, please enter "Unregistered"

Title Number	MX197293
--------------	----------

### Energy Performance Certificate

Do any of the buildings on the application site have an Energy Performance Certificate (EPC)?  Yes  No

### Public/Private Ownership

What is the current ownership status of the site?

Public  Private  Mixed

6. Description of the Proposal

Please describe details of the proposed development or works including any change of use.

If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.

Construction of a new dwelling over 2 storeys plus roof, with associated access road and landscaping

Has the work or change of use already started?

Yes  No

7. Further information about the Proposed Development

Are the proposals eligible for the 'Fast Track Route' based on the affordable housing threshold and other criteria?

Yes  No

Do the proposals cover the whole existing building(s)?

Yes  No

Where proposals only affect part(s) of building(s), please provide details (e.g. 'Rear Ground Floor', 'Unit 1 - 1st-3rd Floor')

The proposals affect only the garden

Current lead Registered Social Landlord (RSL)

If the proposal includes affordable housing, has a Registered Social Landlord been confirmed? If the proposal does not include affordable housing, select 'No'.

Yes  No

Details of building(s)

Please add details for each new separate building(s) being proposed (all fields must be completed). Please only include existing building(s) if they are increasing in height as part of the proposal.

Building reference	New dwelling at rear
Maximum height (Metres)	8.7
Number of storeys	2

Loss of garden land

Will the proposal result in the loss of any residential garden land?

Yes  No

Projected cost of works

Please provide the estimated total cost of the proposal

Up to £2m

8. Vacant Building Credit

Does the proposed development qualify for the vacant building credit?

Yes  No

9. Superseded consents

Does this proposal supersede any existing consent(s)?

Yes  No

Please add details of any superseded consent(s)

LPA Application Number	Partial Supersedence	Unit Reference	Component Description
19/01147/HOU	Yes	Forecourt	Addition of vehicle access to rear plot

## 10. Development Dates

Please add the expected commencement and completion dates for all phases of the proposed development. If the entire development is to be completed in a single phase, state in the 'Phase Detail' that it covers the 'Entire Development'.

Phase Detail	Commencement Month	Commencement Year	Completion Month	Completion Year
1	March	2022	December	2022

## 11. Scheme and Developer Information

### Scheme Name

Does the scheme have a name?  Yes  No

### Developer Information

Has a lead developer been assigned?  Yes  No

## 12. Existing Use

Please describe the current use of the site

Residential garden

Is the site currently vacant?  Yes  No

**Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.**

Land which is known to be contaminated  Yes  No

Land where contamination is suspected for all or part of the site  Yes  No

A proposed use that would be particularly vulnerable to the presence of contamination  Yes  No

## 13. Existing and Proposed Uses

Please add details of the Gross Internal Area (GIA) for all current uses and how this will change based on the proposed development. Details of the floor area for any proposed new uses should also be added.

Following changes to Use Classes on 1 September 2020: The list includes the now revoked Use Classes A1-5, B1, and D1-2 that should not be used in most cases. Also, the list does not include the newly introduced Use Classes E and F1-2. To provide details in relation to these, select 'Other' and specify the use where prompted. View further information on Use Classes. Multiple 'Other' options can be added to cover each individual use. If the 'Other' option is not displayed, please contact our service desk to resolve this.

Use Class	Existing gross internal floor area (square metres)	Gross internal floor area lost (including by change of use) (square metres)	Gross internal floor area gained (including change of use) (square metres)
C3 - Dwellinghouses	400	0	348
Total	400	0	348

## 14. Materials

Does the proposed development require any materials to be used externally?  Yes  No

**Please provide a description of existing and proposed materials and finishes to be used externally (including type, colour and name for each material):**

Walls	
Description of existing materials and finishes (optional):	N/A

Description of proposed materials and finishes:	White rendered masonry
---	------------------------

Roof	
Description of existing materials and finishes (optional):	N/A
Description of proposed materials and finishes:	Clay tiles to match surrounding buildings

Windows	
Description of existing materials and finishes (optional):	N/A
Description of proposed materials and finishes:	Powder Coated Aluminium

Doors	
Description of existing materials and finishes (optional):	N/A
Description of proposed materials and finishes:	Powder Coated Aluminium

Are you supplying additional information on submitted plans, drawings or a design and access statement?  Yes  No

If Yes, please state references for the plans, drawings and/or design and access statement

LOCATION PLAN, 001 - PROPOSED BLOCK PLAN, E01 - EXISTING BLOCK PLAN, E02 - TREE CONSTRAINTS PLAN, 100 - GROUND FLOOR PLAN, 101 - FIRST FLOOR PLAN, 102 - SECOND FLOOR PLAN, 104 - FRONT AND REAR ELEVATIONS, 105 - PROPOSED SIDE ELEVATIONS, 106 - PROPOSED SECTIONS, 107 - TREE PROTECTION PLAN, 108 - EXISTING AND PROPOSED SITE SECTIONS, 109 - FRONT GARDEN PLAN, 110 - BUILD UP OF FORECOURT AREA, 111 - STREET SCENE DRAWING, 112 - SITE ENTRANCE, 18 WAGGON ROAD SUDS REPORT, 2020-11-10 Tree survey report, Tree Survey Schedule

**15. Pedestrian and Vehicle Access, Roads and Rights of Way**

Is a new or altered vehicular access proposed to or from the public highway?  Yes  No

Is a new or altered pedestrian access proposed to or from the public highway?  Yes  No

Are there any new public roads to be provided within the site?  Yes  No

Are there any new public rights of way to be provided within or adjacent to the site?  Yes  No

Do the proposals require any diversions/extinguishments and/or creation of rights of way?  Yes  No

**16. Vehicle Parking**

Does the site have any existing vehicle/cycle parking spaces or will the proposed development add/remove any parking spaces?  Yes  No

Please provide the number of existing and proposed parking spaces.  
Please note that car parking spaces and disabled persons parking spaces should be recorded separately unless its residential off-street parking which should include both.

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	2	4	2



## 17. Electric vehicle charging points

Do the proposals include electric vehicle charging points and/or hydrogen refuelling facilities?

Yes  No

Please add details of the charging points.

Active charging points: Fully installed and ready to use.

Passive charging points: Electrical infrastructure/capacity in place to allow charging points to be installed.

Charging points	Active	Passive
Rapid charging points (50+ kw)	1	1
Total charging points	1	1

## 18. Trees and Hedges

Are there trees or hedges on the proposed development site?

Yes  No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

Yes  No

**If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of your local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.**

## 19. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Check the location on the Government's Flood map for planning. You should also refer to national standing advice and your local planning authority requirements for information as necessary.)

Yes  No

**If Yes, you will need to submit a Flood Risk Assessment to consider the risk to the proposed site.**

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

Yes  No

Will the proposal increase the flood risk elsewhere?

Yes  No

**How will surface water be disposed of?**

Sustainable drainage system

Existing water course

Soakaway

Main sewer

Pond/lake

## 20. Biodiversity and Geological Conservation

**Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?**

**To assist in answering this question correctly, please refer to the help text which provides guidance on determining if any important biodiversity or geological conservation features may be present or nearby; and whether they are likely to be affected by the proposals.**

a) Protected and priority species:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

b) Designated sites, important habitats or other biodiversity features:

- Yes, on the development site  
 Yes, on land adjacent to or near the proposed development  
 No

c) Features of geological conservation importance:

- Yes, on the development site
- Yes, on land adjacent to or near the proposed development
- No

**21. Open and Protected Space**

Will the proposed development result in the loss, gain or change of use of any open space?  Yes  No

Will the proposed development result in the loss, gain or change of use of a site protected with a nature designation?  Yes  No

**22. Foul Sewage**

Please state how foul sewage is to be disposed of:

- Mains Sewer
- Septic Tank
- Package Treatment plant
- Cess Pit
- Other
- Unknown

Are you proposing to connect to the existing drainage system?  Yes  No  Unknown

If Yes, please include the details of the existing system on the application drawings. Please state the plan(s)/drawing(s) references.

001 Proposed Block Plan

**23. Water Management**

Please state the expected percentage reduction of surface water discharge (for a 1 in 100-year rainfall event) from the proposal

Are Green Sustainable Drainage Systems (SuDS) incorporated into the drainage design for the proposal?  Yes  No

Please state the expected internal residential water usage of the proposal (litres per person per day)

Does the proposal include the harvesting of rainfall?  Yes  No

Does the proposal include re-use of grey water?  Yes  No

**24. Trade Effluent**

Does the proposal involve the need to dispose of trade effluents or trade waste?  Yes  No

**25. Residential Units**

Does this proposal involve the loss or replacement of any self-contained residential units or student accommodation (including those being rebuilt)?  Yes  No

Does this proposal involve the addition of any self-contained residential units or student accommodation (including those being rebuilt)?  Yes  No

**Residential Units to be added**

Please provide details for each separate type and specification of residential unit being provided.

Units Gained											
Unit type	Units	Tenure	GIA	Habitable rooms	Bedrooms	M4(2)	M4(3)(2a)	M4(3)(2b)	Sheltered Accommodation	Older Persons Housing	Garden Land
Detached Home	1	Self-Build and Custom Build	348	8	5						Yes

Please add details for every unit of communal space to be added

Who will be the provider of the proposed unit(s)?	Private
Total number of residential units proposed	1
Total residential GIA (Gross Internal Floor Area) gained	348

**26. Non-Permanent Dwellings**

Please add details of any non-permanent dwellings (if used as main residence e.g. caravans, mobile homes, converted railway carriages, etc...), traveller pitches/plots or houseboat moorings that this proposal seeks to add or remove

**27. Other Residential Accommodation**

Please add details of any non self-contained accommodation, based on the categories in the drop down menu, that this proposal seeks to add, remove or rebuild.

Provision for older people  
Please specify the number of proposed rooms, of the types listed below, to be specifically provided for older people

Older persons care home accommodation - Residential care homes (Use Class C2)	0
Older persons supported and specialised accommodation - Hostel (Sui Generis Use)	0

**28. Waste and recycling provision**

Does every unit in this proposal (residential and non-residential) have dedicated internal and external storage space for dry recycling, food waste and residual waste?  Yes  No

**29. Utilities**

**Water and gas connections**

Number of new water connections required	1
Number of new gas connections required	1

**Fire safety**

Is a fire suppression system proposed?  Yes  No

**Internet connections**

Number of residential units to be served by full fibre internet connections	1
Number of non-residential units to be served by full fibre internet connections	0

**Mobile networks**

## 29. Utilities

Has consultation with mobile network operators been carried out?

Yes  No

## 30. Environmental Impacts

### Community energy

Will the proposal provide any on-site community-owned energy generation?

Yes  No

### Heat pumps

Will the proposal provide any heat pumps?

Yes  No

### Solar energy

Does the proposal include solar energy of any kind?

Yes  No

### Passive cooling units

Number of proposed residential units with passive cooling

0

### Emissions

NOx total annual emissions (Kilograms)

0.00

Particulate matter (PM) total annual emissions (Kilograms)

0.00

### Greenhouse gas emission reductions

Are the on-site Greenhouse gas emission reductions at least 35% above those set out in Part L of Building Regulations 2013?

Yes  No

### Green Roof

Proposed area of 'Green Roof' to be added (Square metres)

0.00

### Urban Greening Factor

Please enter the Urban Greening Factor score

0.50

### Residential units with electrical heating

Number of proposed residential units with electrical heating

0

### Reused/Recycled materials

Percentage of demolition/construction material to be reused/recycled

5

## 31. Employment

Are there any existing employees on the site or will the proposed development increase or decrease the number of employees?

Yes  No

## 32. Hours of Opening

Are Hours of Opening relevant to this proposal?

Yes  No

## 33. Industrial or Commercial Processes and Machinery

Does this proposal involve the carrying out of industrial or commercial activities and processes?

Yes  No

Is the proposal for a waste management development?

Yes  No

**If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make it clear what information it requires on its website**

### 34. Hazardous Substances

Does the proposal involve the use or storage of any hazardous substances?

Yes  No

### 35. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes  No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact?

- The agent
- The applicant
- Other person

### 36. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes  No

### 37. Authority Employee/Member

With respect to the Authority, is the applicant and/or agent one of the following:

- (a) a member of staff
- (b) an elected member
- (c) related to a member of staff
- (d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

Yes  No

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

### 38. Ownership Certificates and Agricultural Land Declaration

**CERTIFICATE OF OWNERSHIP - CERTIFICATE A - Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14**

I certify/The applicant certifies that on the day 21 days before the date of this application nobody except myself/the applicant was the owner\* of any part of the land or building to which the application relates, and that none of the land to which the application relates is, or is part of, an agricultural holding\*\*

\* 'owner' is a person with a freehold interest or leasehold interest with at least 7 years left to run. \*\* 'agricultural holding' has the meaning given by reference to the definition of 'agricultural tenant' in section 65(8) of the Act.

**NOTE: You should sign Certificate B, C or D, as appropriate, if you are the sole owner of the land or building to which the application relates but the land is, or is part of, an agricultural holding.**

Person role

- The applicant
- The agent

Title

First name

Surname

Declaration date (DD/MM/YYYY)

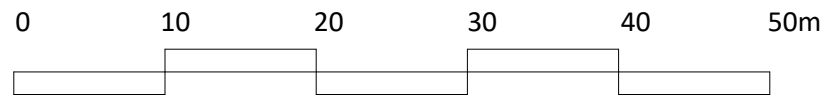
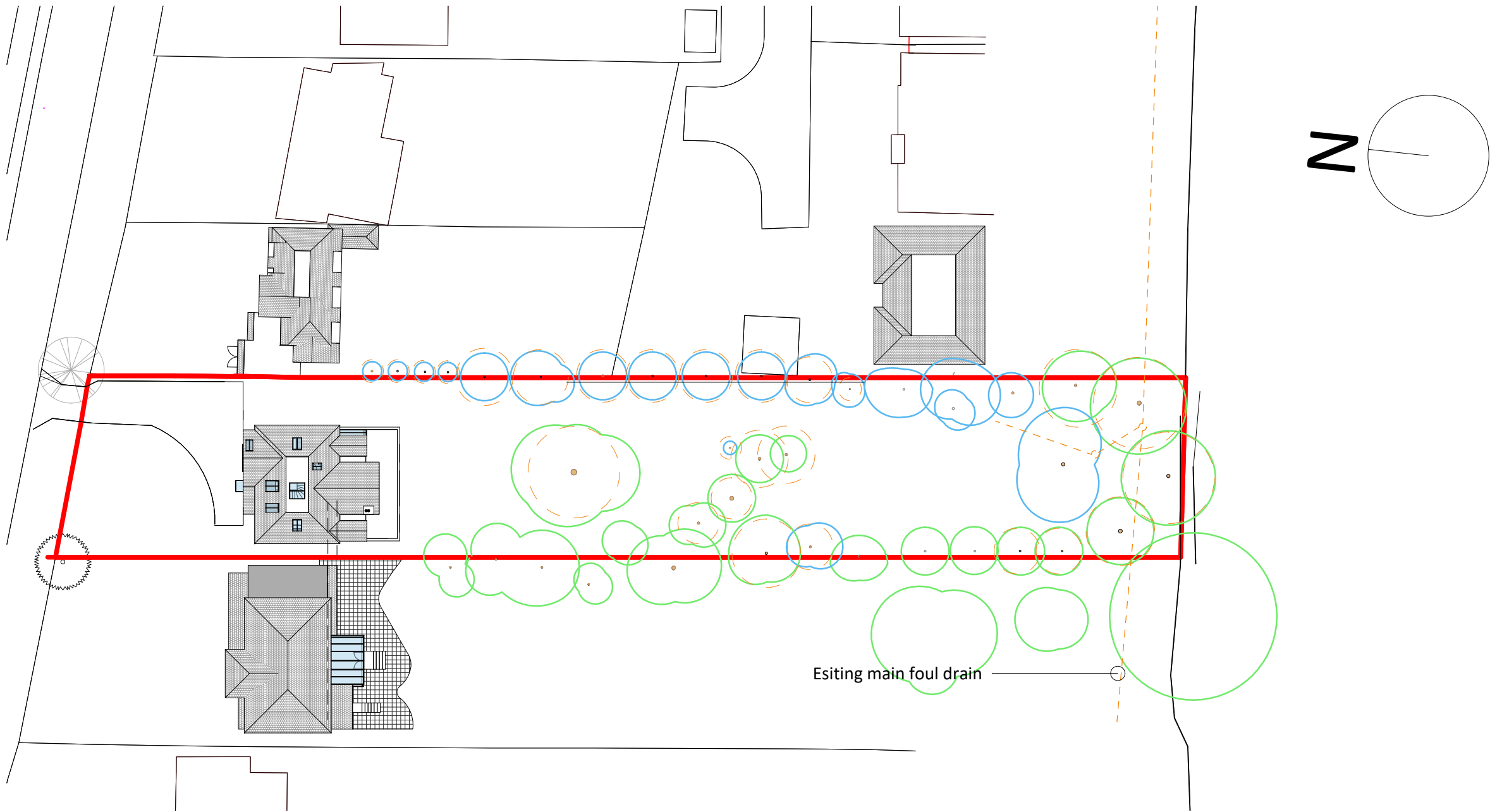
Declaration made

### 39. Declaration

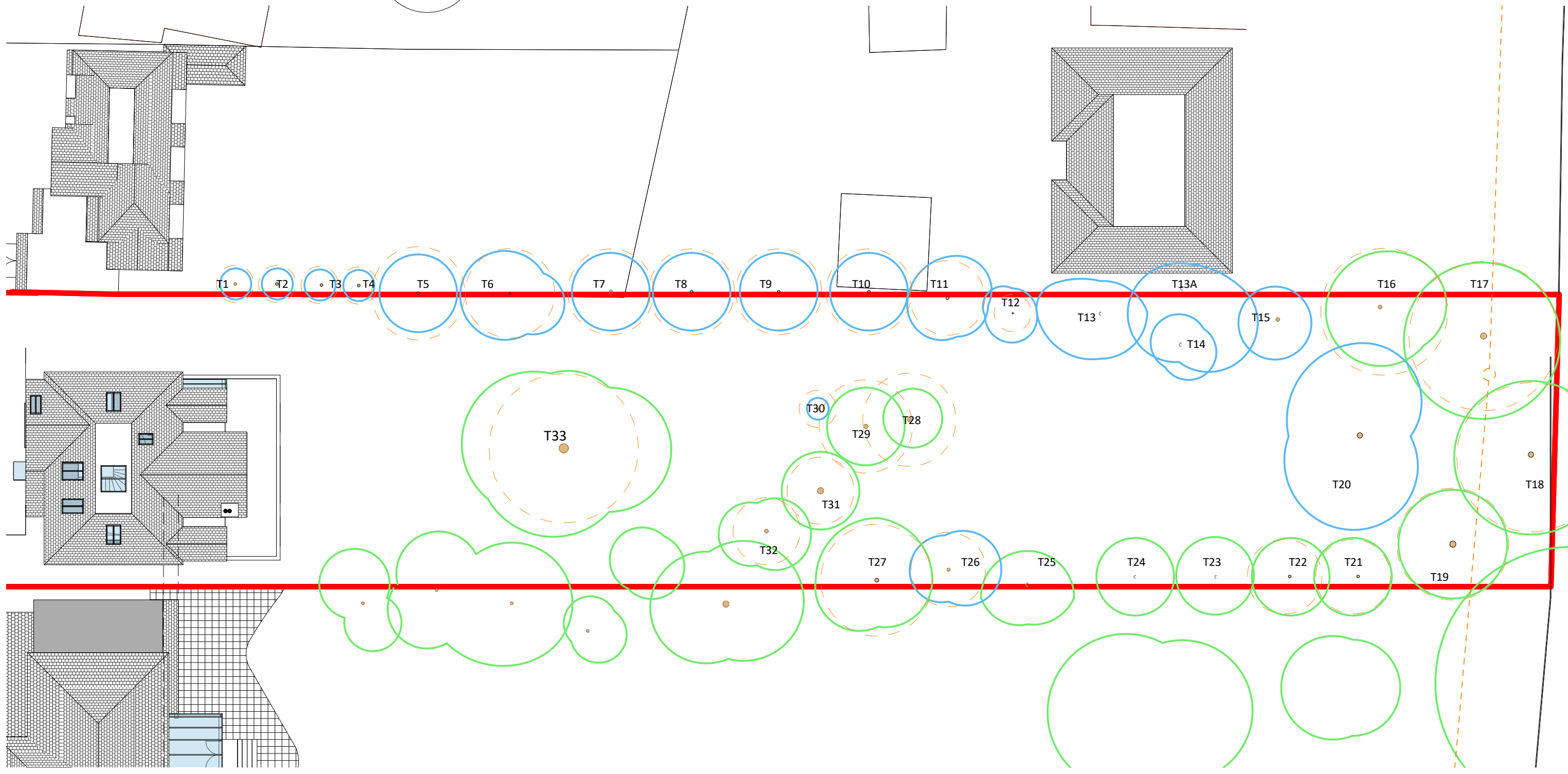
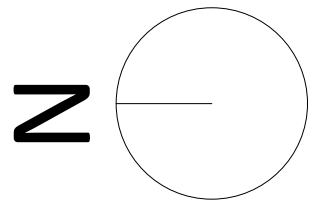
I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Date (cannot be pre-application)

29/04/2021



A3 @	03.08.2020	A3656 53 E01
18 WAGGON ROAD- REAR PLOT		
EXISTING: BLOCK PLAN		
www.argent-architects.co.uk	tel 01834 845440	
info@argent-architects.co.uk	fax 01834 845440	

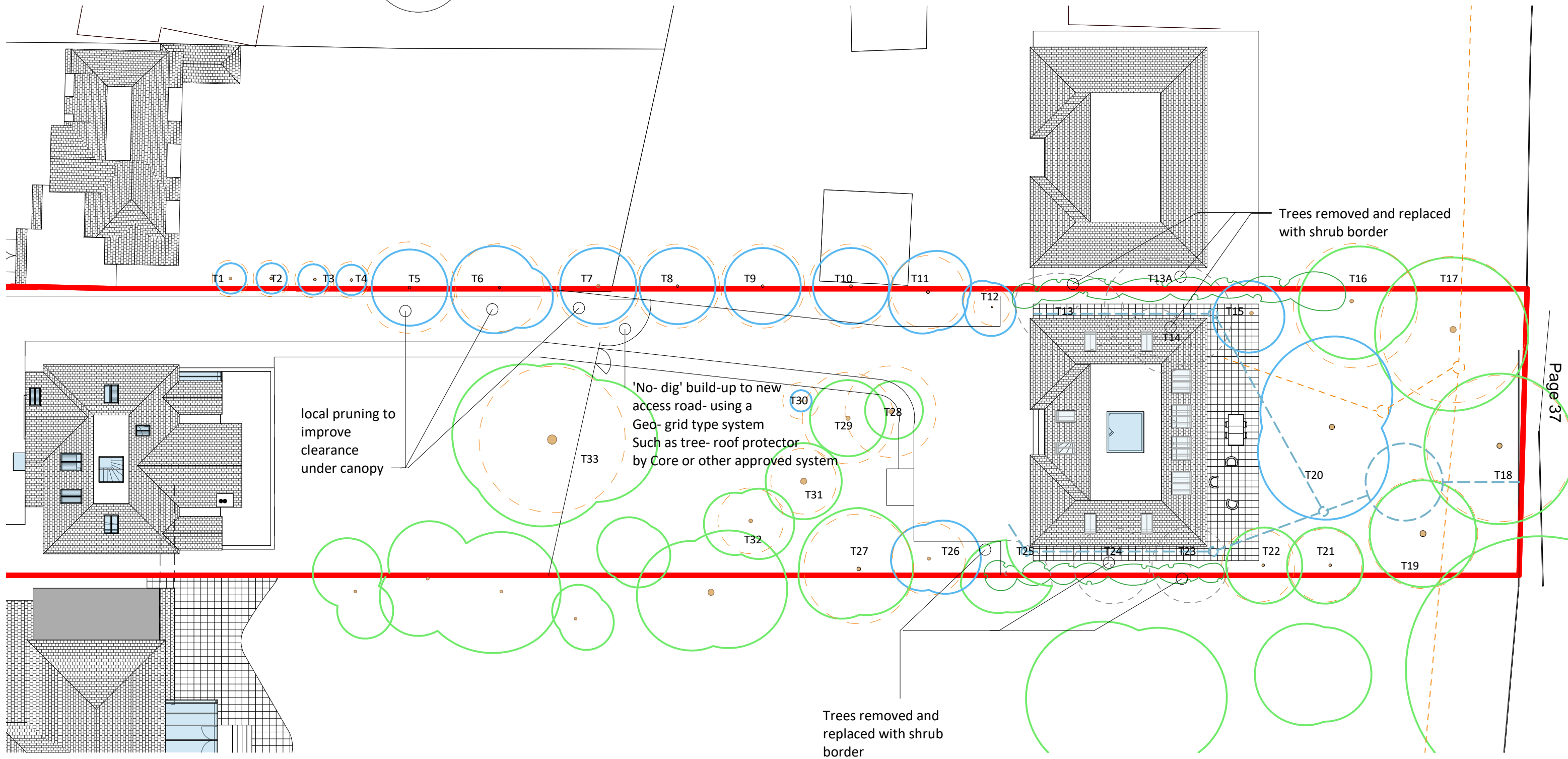
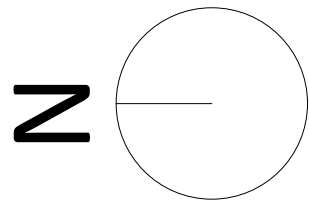


Page 36



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EXISTING: TREE CONSTRAINTS PLAN	www.argent-architects.co.uk tel 01834 845440		ARGENT ARCHITECTS	
	admin@argent-architects.co.uk			





18 WAGGON ROAD- REAR PLOT

PROPOSALS:  
TREE PROTECTION PLAN

A3 @

1 : 250

03.08.2020

A3656 53 107

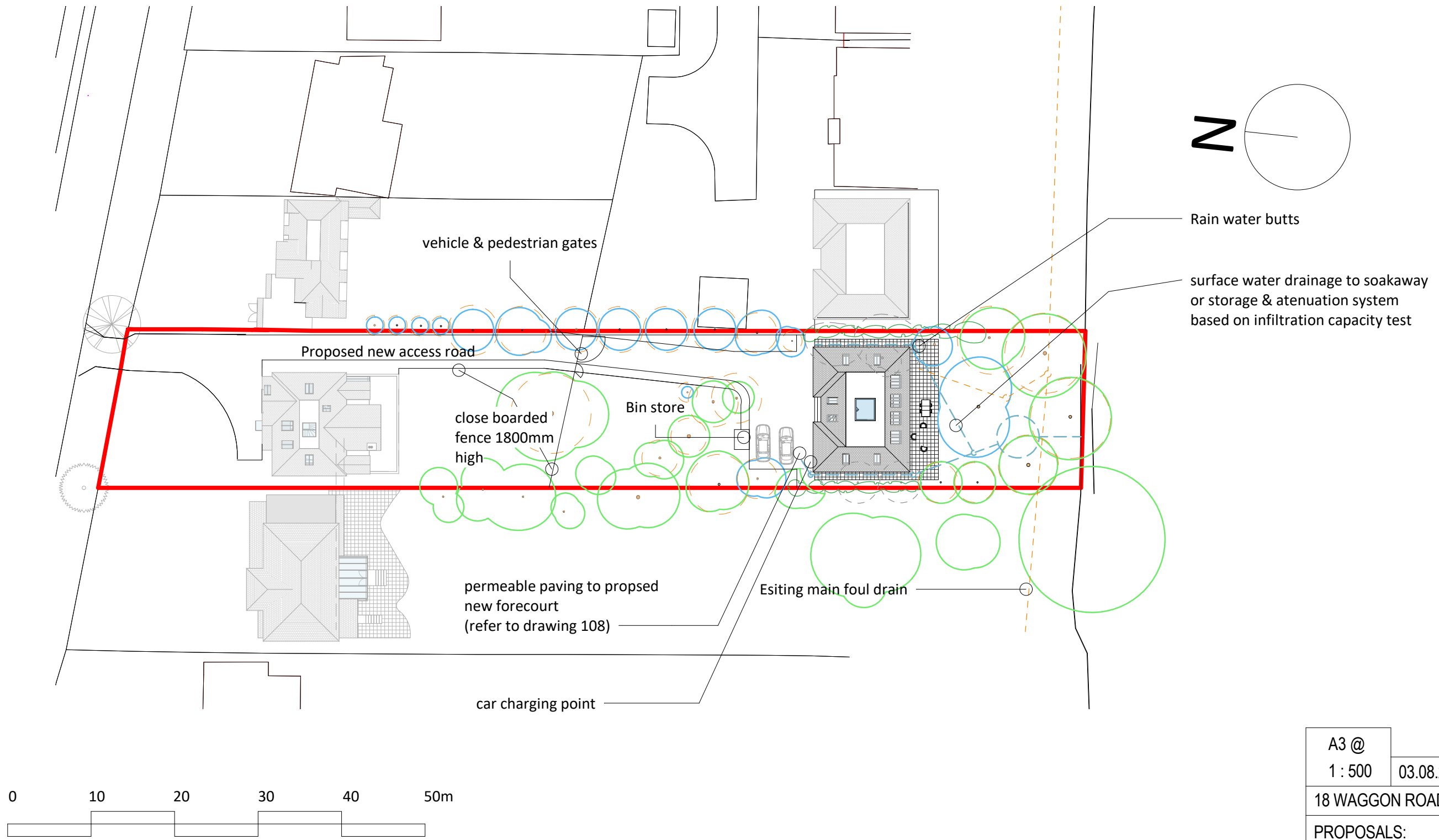
www.argent-architects.co.uk

tel 01834 845440

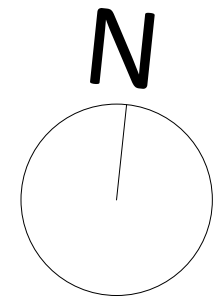
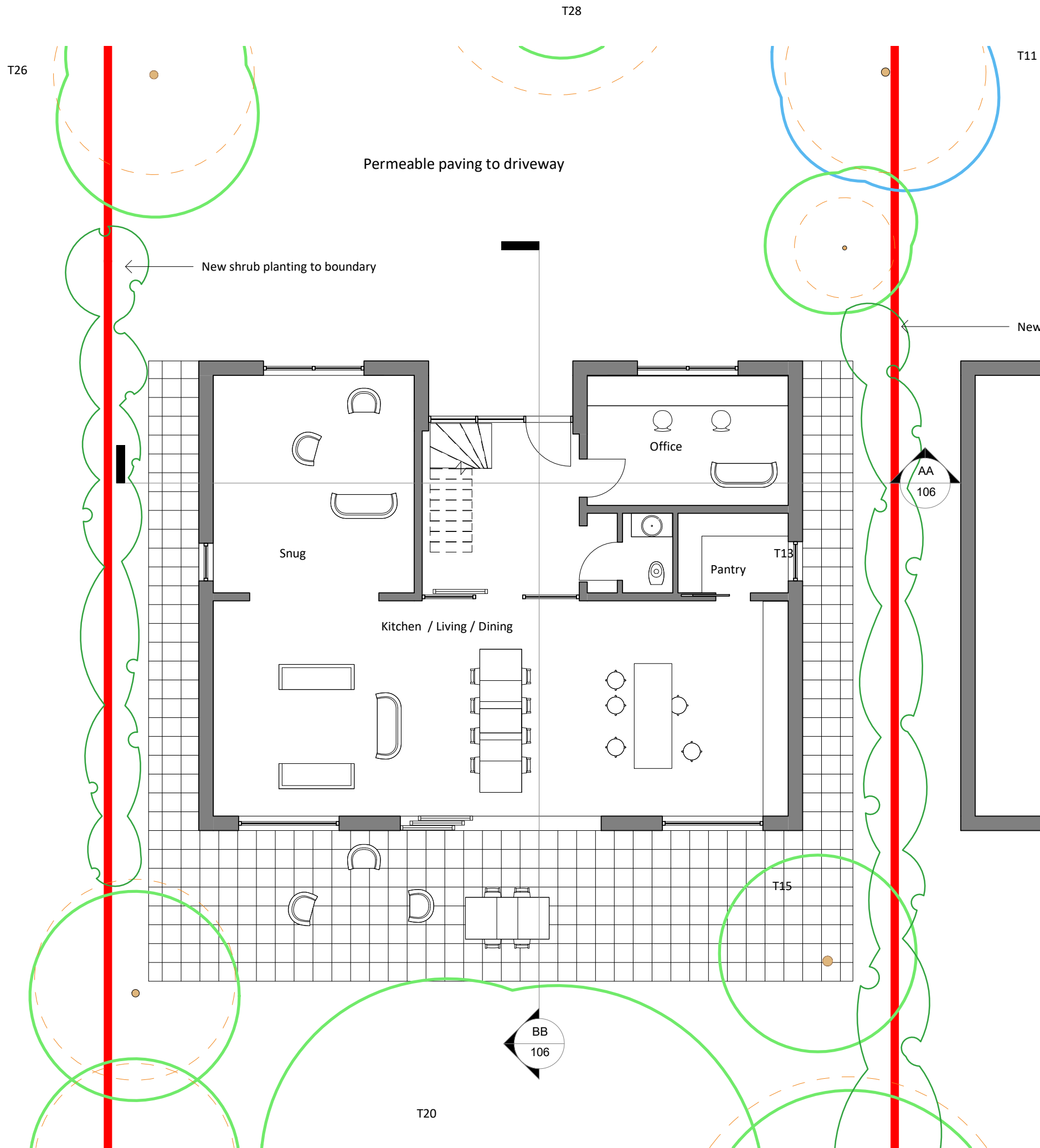
**ARGENT ARCHITECTS**

admin@argent-architects.co.uk

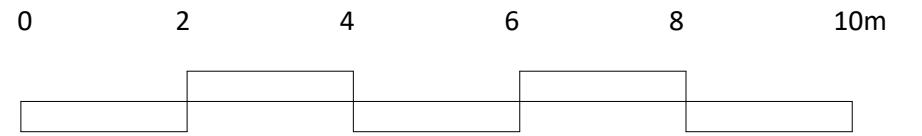
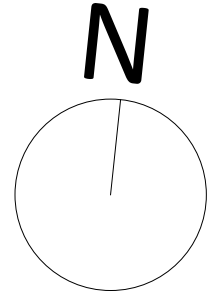
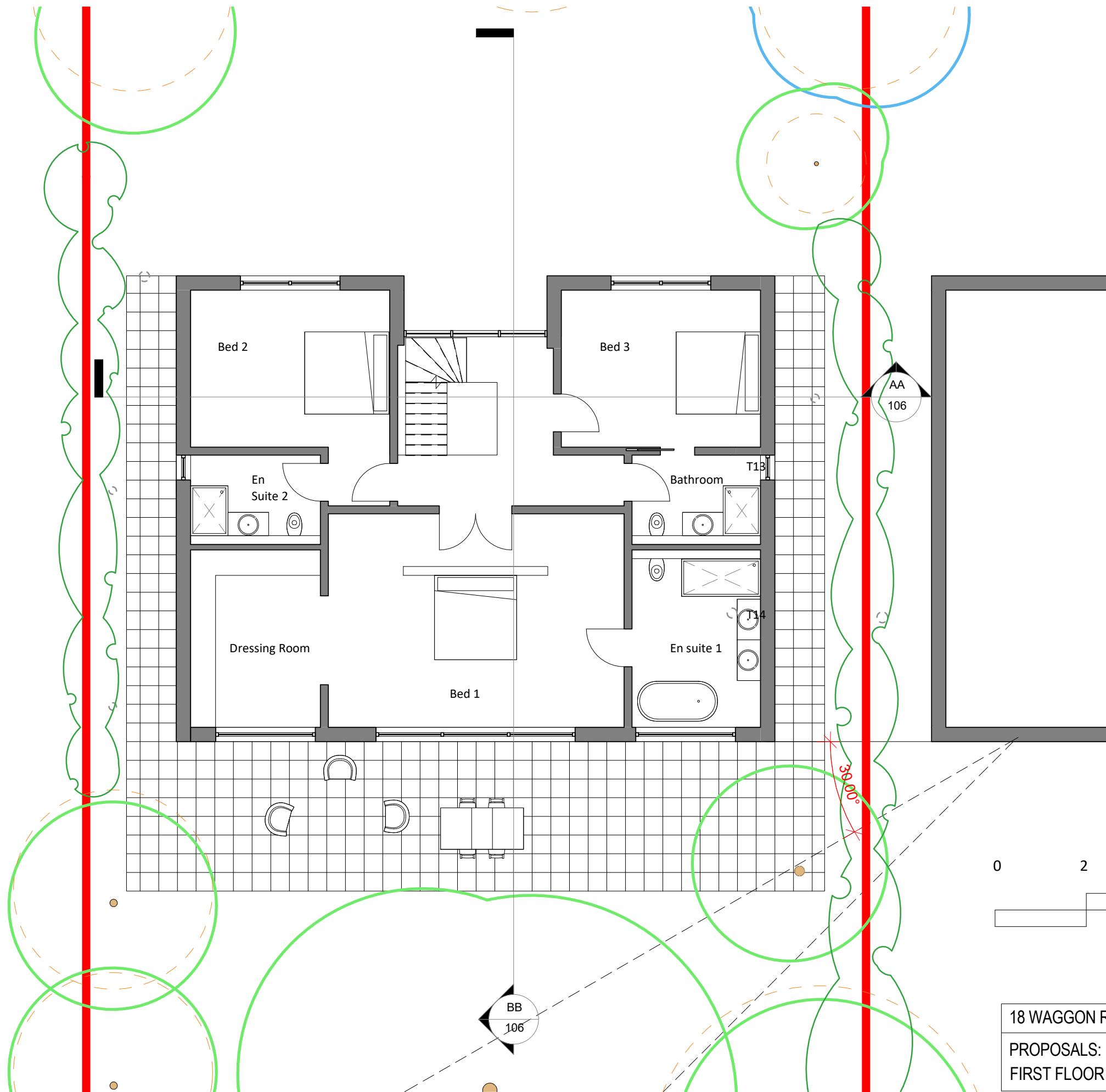




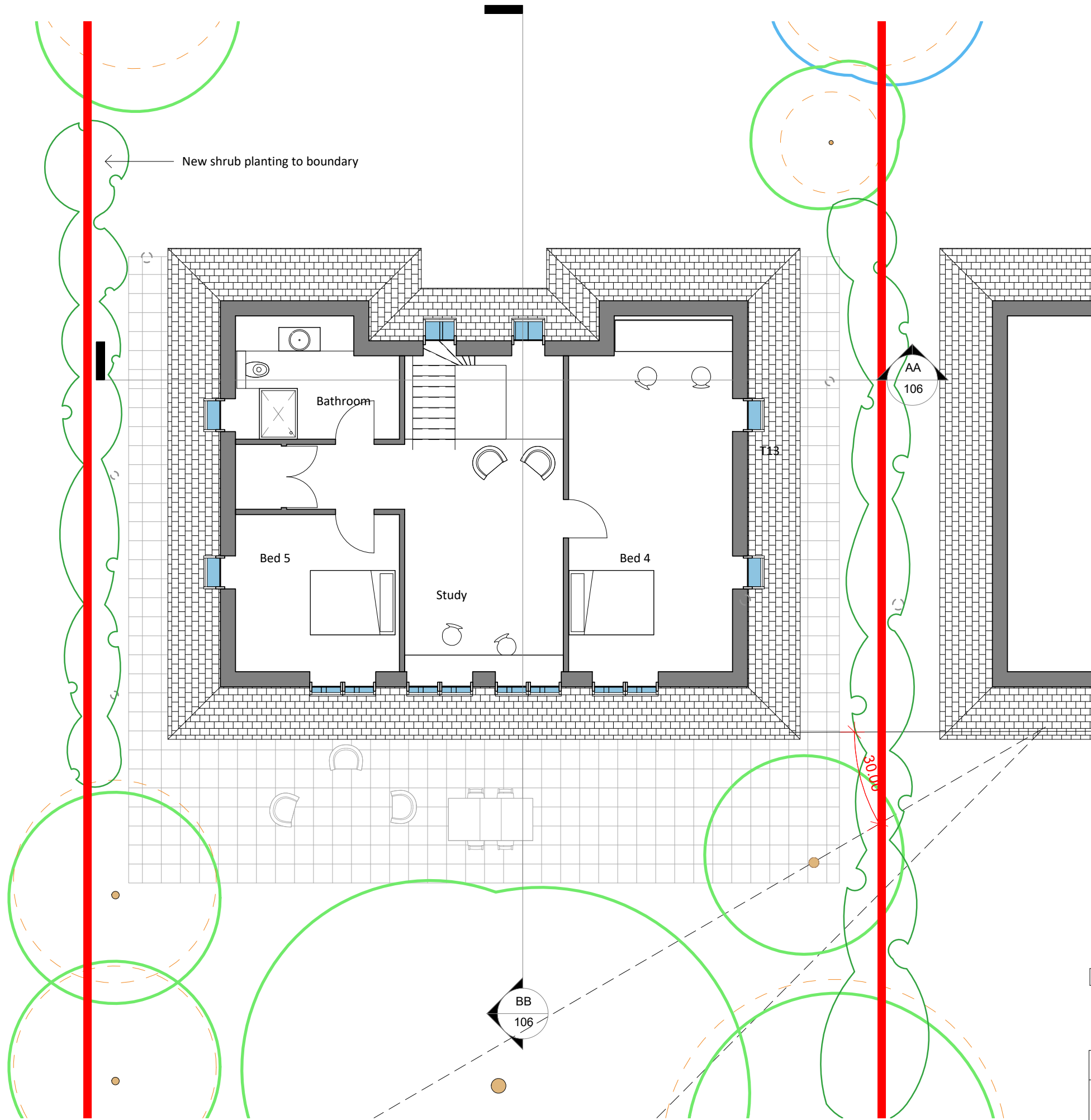
A3 @	03.08.2020	A3656 53 001
1 : 500		
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PROPOSALS: PROPOSED BLOCK PLAN		
www.argent-architects.co.uk	tel 01834 845440	
info@argent-architects.co.uk	fax 01834 845440	



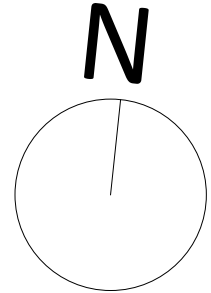
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	1 : 100		
PROPOSALS: GROUND FLOOR PLAN	www.argent-architects.co.uk	tel 01834 845440	
	admin@argent-architects.co.uk		



18 WAGGON ROAD- REAR PLOT PROPOSALS: FIRST FLOOR PLAN	A3 @ 1 : 100	03.08.2020	A3656 53 101
	www.argent-architects.co.uk tel 01834 845440 <b>ARGENT ARCHITECTS</b> admin@argent-architects.co.uk		



New shrub planting to boundary



18 WAGGON ROAD- REAR PLOT	A3 @ 1 : 100	03.08.2020	A3656 53 102
PROPOSALS: SECOND FLOOR PLAN	www.argent-architects.co.uk tel 01834 845440 <b>ARGENT ARCHITECTS</b> admin@argent-architects.co.uk		



SCHEDULE OF MATERIALS

ROOF: CLAY TILED TO MATCH EXISTING  
 WINDOWS & DOORS: ALUMINIUM POWDER COATED  
 TO RAL. 7016 DARK GREY

WALLS: WHITE RENDER

Front Elevation



Rear Elevation



18 WAGGON ROAD- REAR PLOT

PROPOSALS:  
 FRONT AND REAR ELEVATIONS

A3 @

1 : 100

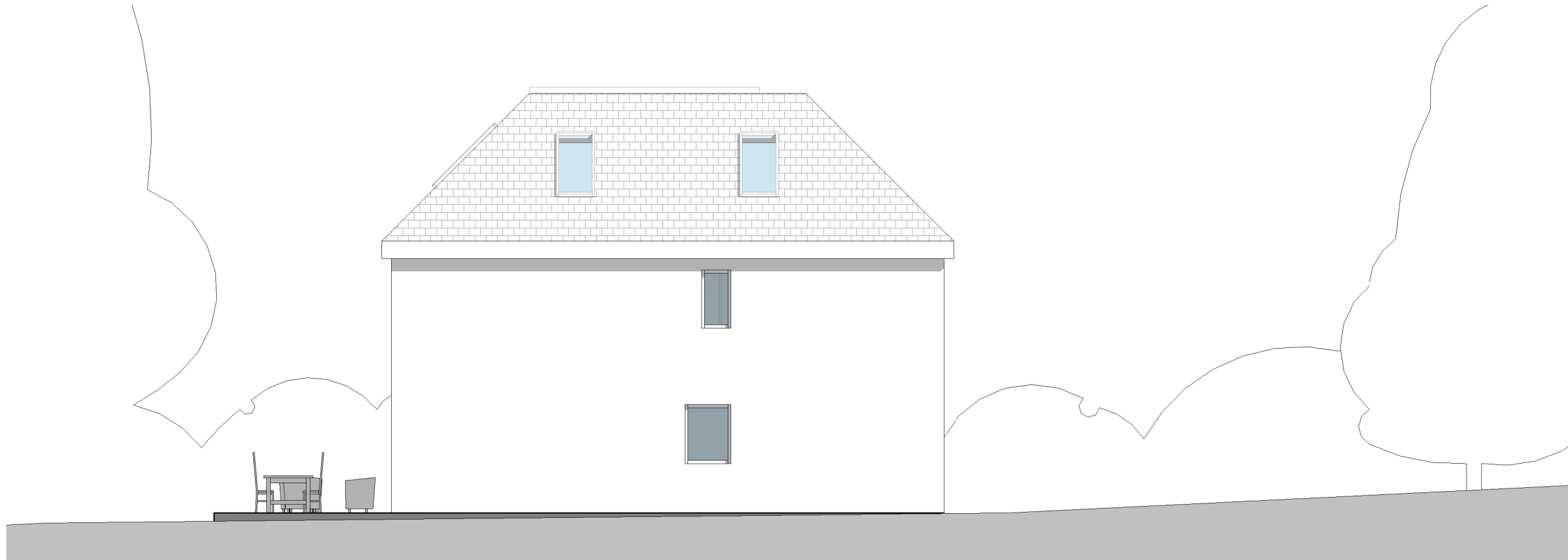
03.08.2020

A3656 53 104

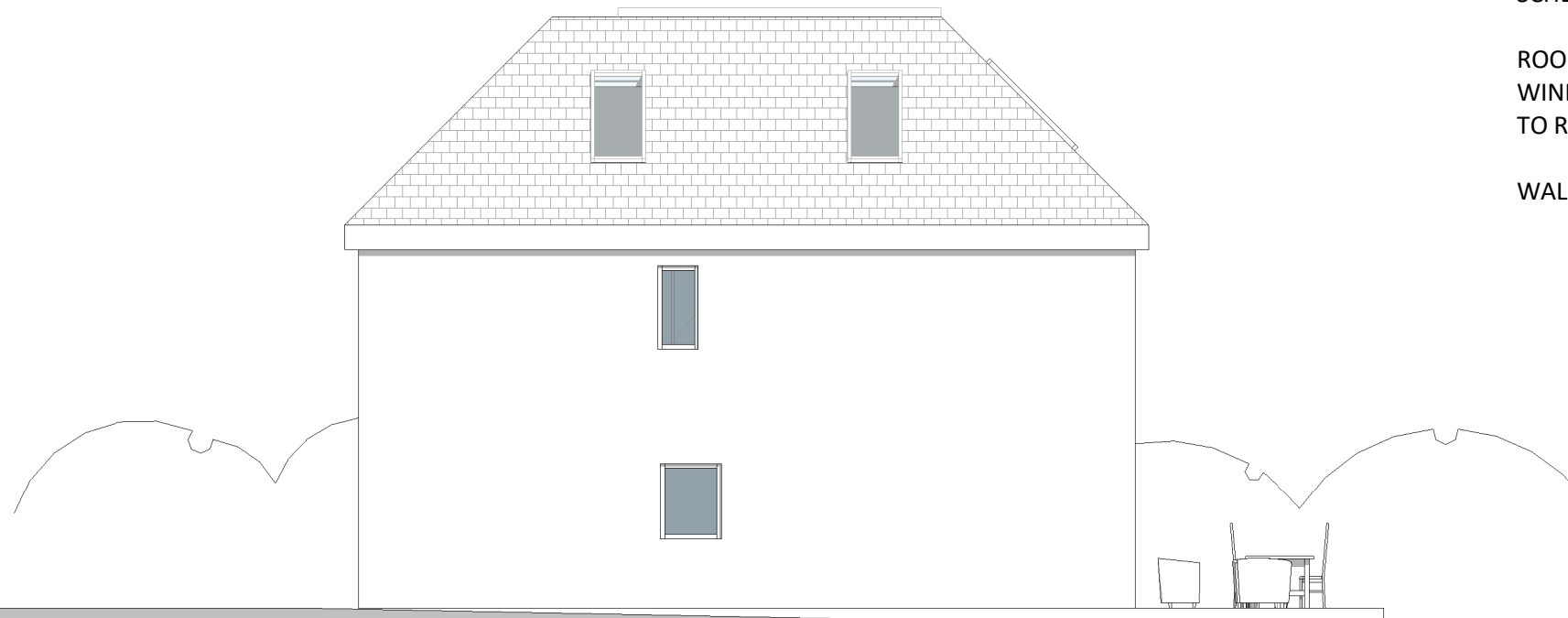
www.argent-architects.co.uk tel 01834 845440

ARGENT ARCHITECTS  
 admin@argent-architects.co.uk





East Elevation



West Elevation

SCHEDULE OF MATERIALS

ROOF: CLAY TILED TO MATCH EXISTING  
 WINDOWS & DOORS: ALUMINIUM POWDER COATED  
 TO RAL. 7016 DARK GREY

WALLS: WHITE RENDER



18 WAGGON ROAD- REAR PLOT

PROPOSALS:  
 SIDE ELEVATIONS

A3 @

1 : 100

03.08.2020

A3656 53 105

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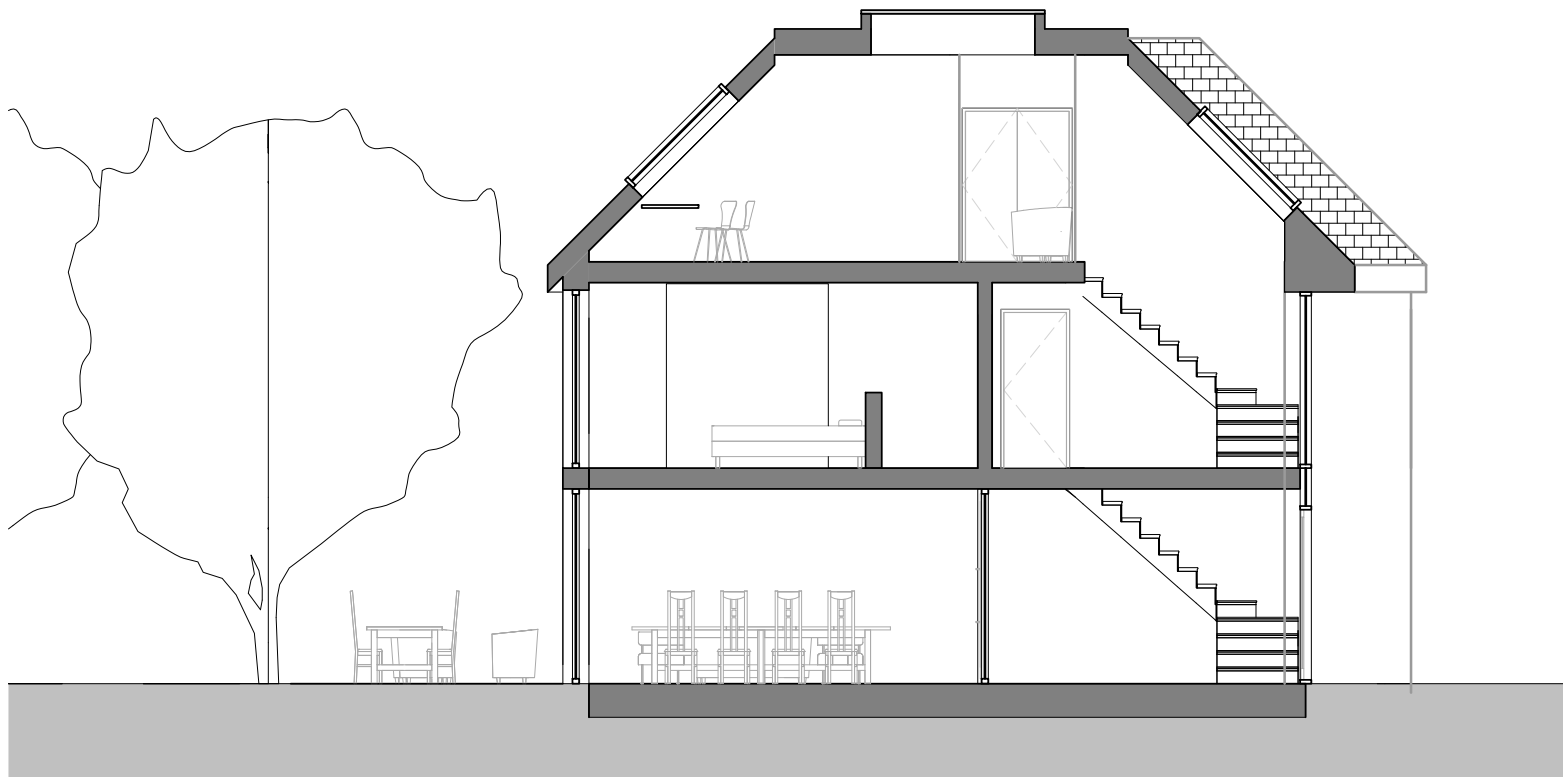
**ARGENT ARCHITECTS**

admin@argent-architects.co.uk

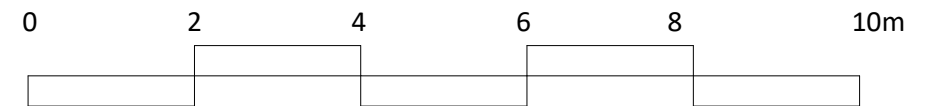




Section AA

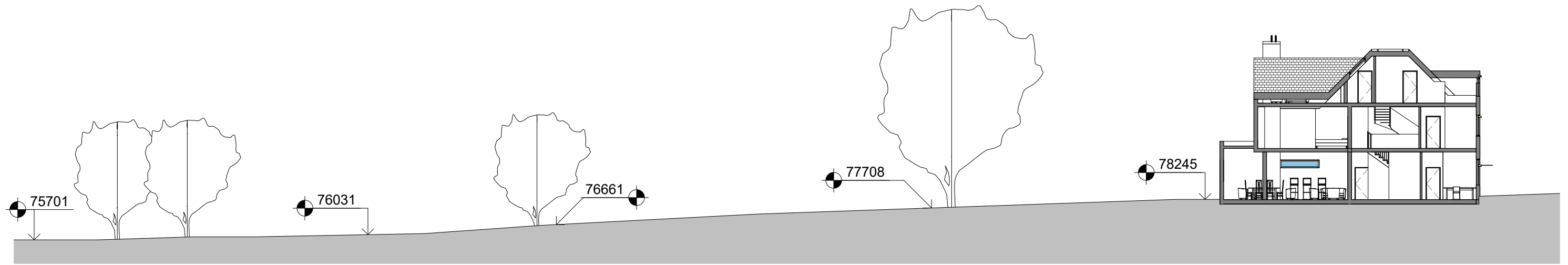


Section BB

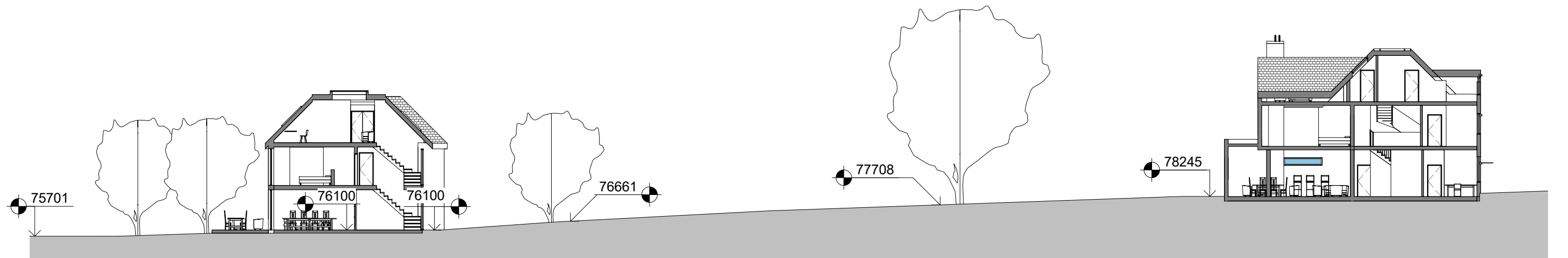


18 WAGGON ROAD- REAR PLOT	A3 @ 1 : 100	03.08.2020	A3656 53 106
PROPOSALS: SECTIONS	www.argent-architects.co.uk <b>ARGENT ARCHITECTS</b> admin@argent-architects.co.uk	tel 01834 845440	






Existing site section

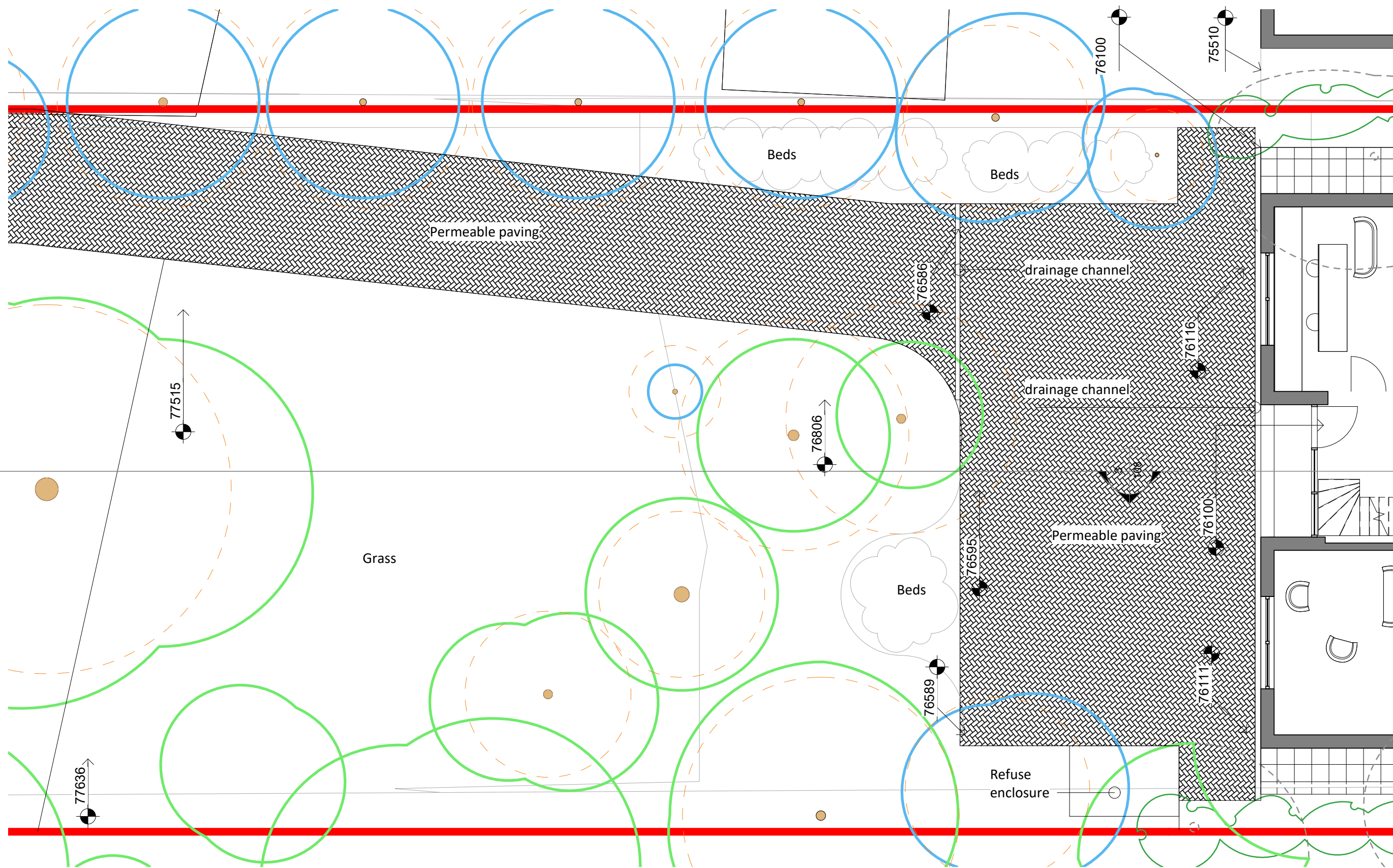



Proposed Site Section



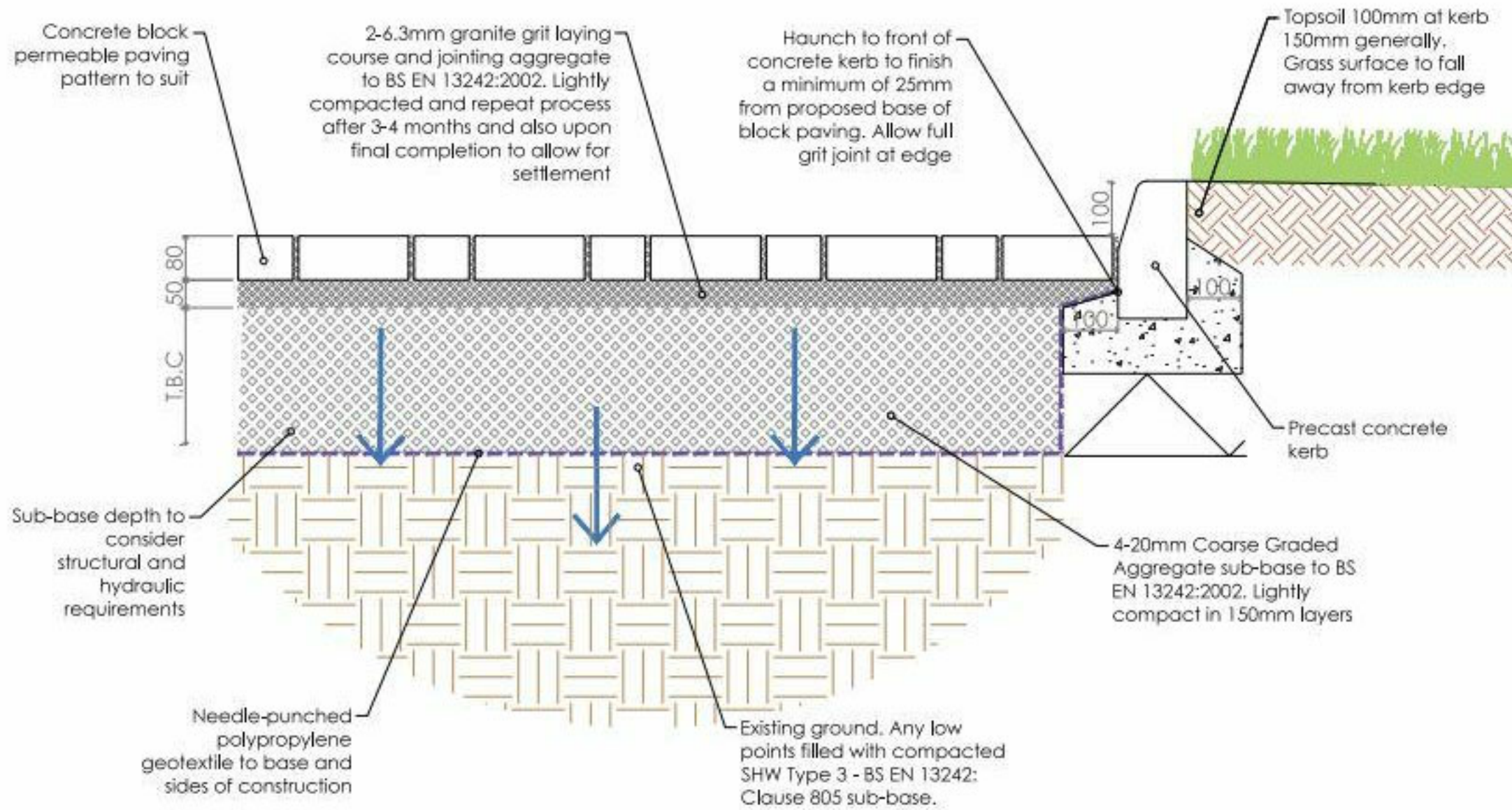
18 WAGGON ROAD- REAR PLOT  
 PROPOSALS:  
 EXISTING AND PROPOSED SITE  
 SECTIONS

A3 @	03.08.2020	A3656 53 108
1 : 250	www.argent-architects.co.uk	tel 01834 845440
ARGENT ARCHITECTS		
admin@argent-architects.co.uk		




18 WAGGON ROAD- REAR PLOT		A3 @	03.08.2020	A3656 53 109
PROPOSALS: FRONT GARDEN PLAN		1 : 100	www.argent-architects.co.uk	tel 01834 845440
		ARGENT ARCHITECTS		
		admin@argent-architects.co.uk		

**Detail 1 - Permeable Paving (System A) with Total Infiltration**

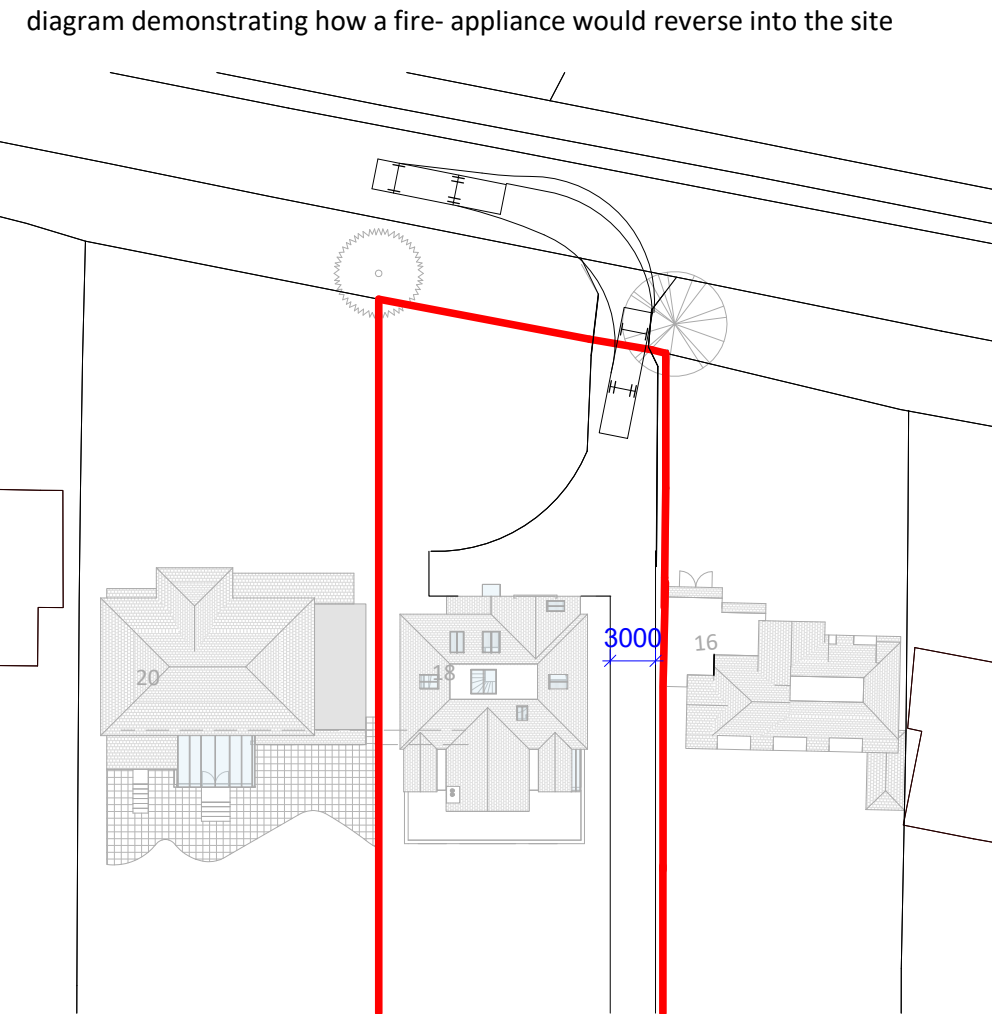
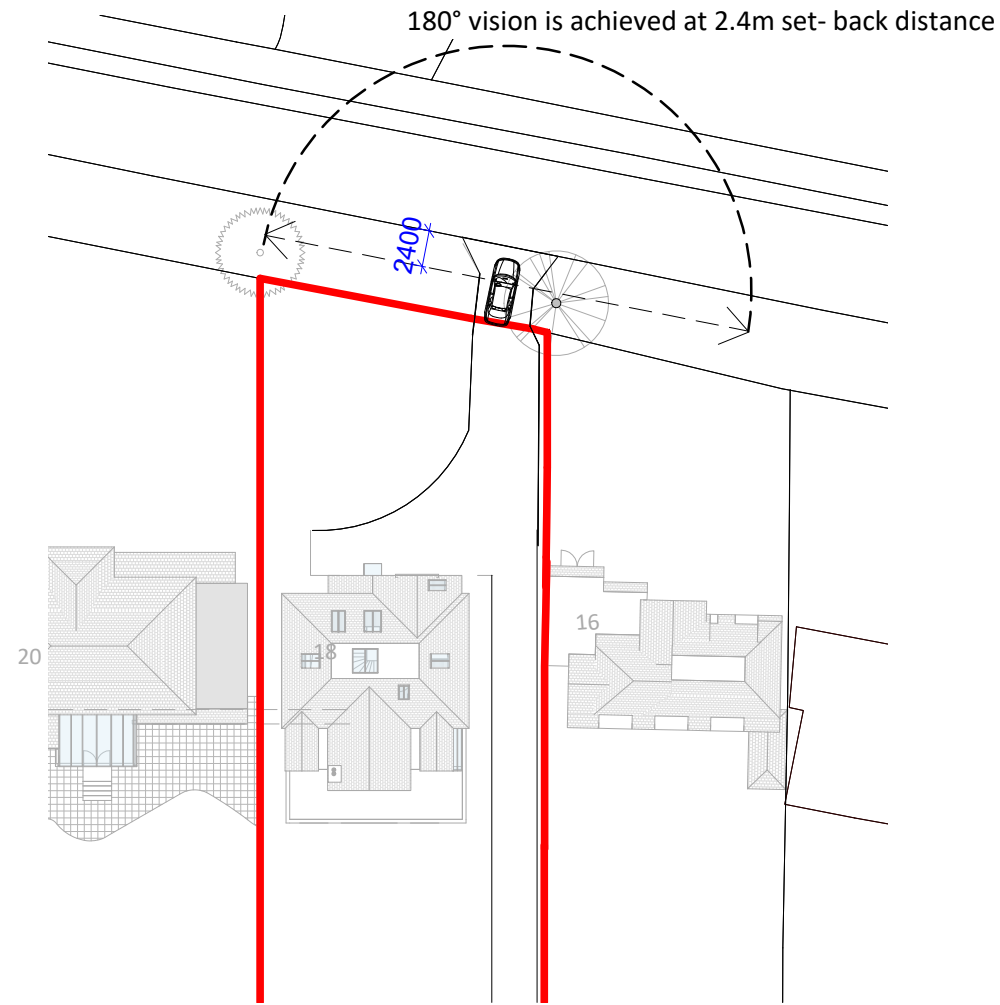


Subject to the results of a percolation test, an outlet to a storage system may be required


18 WAGGON ROAD- REAR PLOT	A3 @	03.08.2020	A3656 53 110
PROPOSALS: BUILD UP OF FORECOURT AREA	www.argent-architects.co.uk admin@argent-architects.co.uk	tel 01834 845440	

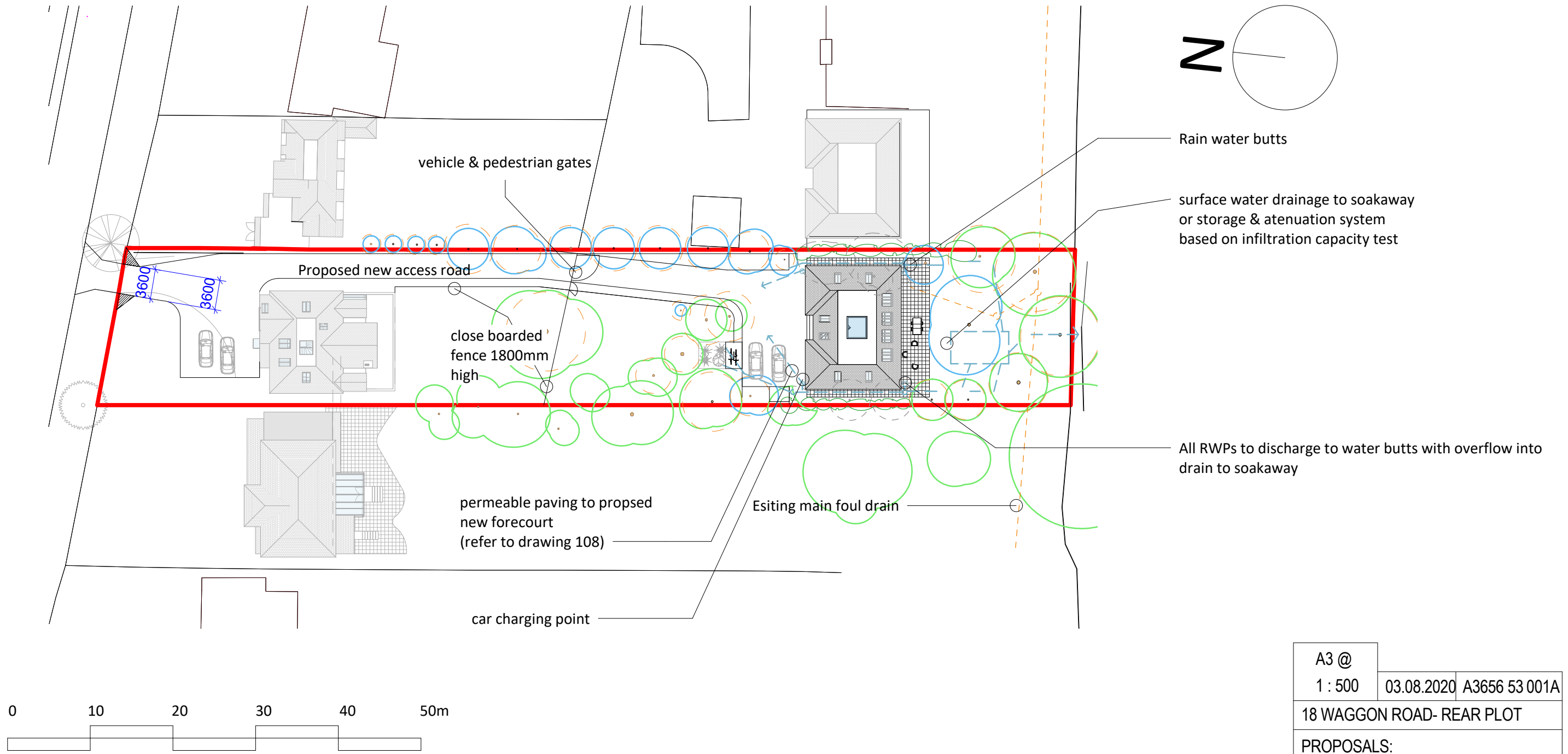



18 WAGGON ROAD- REAR PLOT	A3 @	1 : 200	03.08.2020	A3656 53 111
PROPOSALS: STREET SCENE DRAWING	www.argent-architects.co.uk		tel 01834 845440	
	ARGENT ARCHITECTS			
	admin@argent-architects.co.uk			

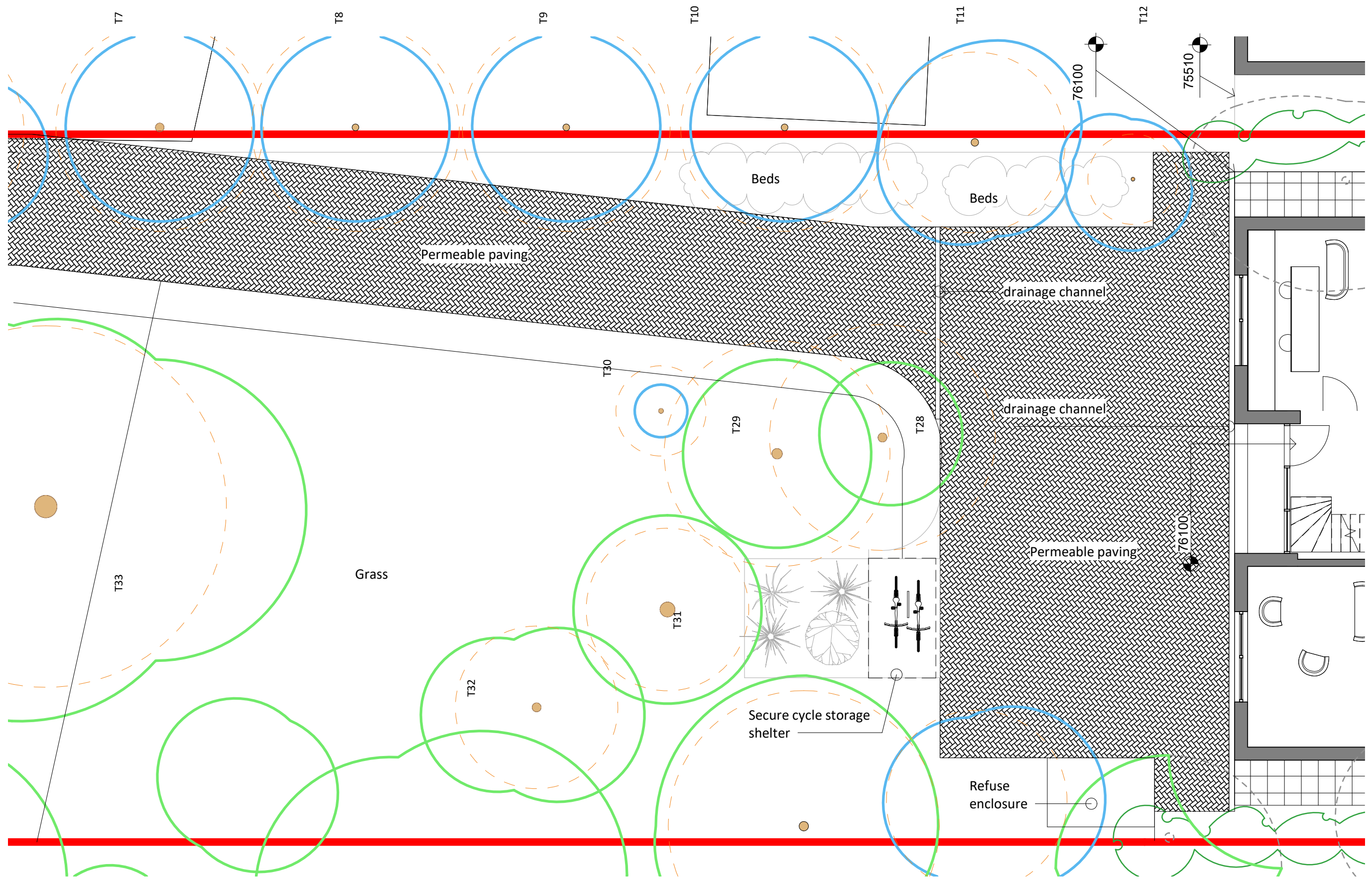



view of site entrance in existing condition

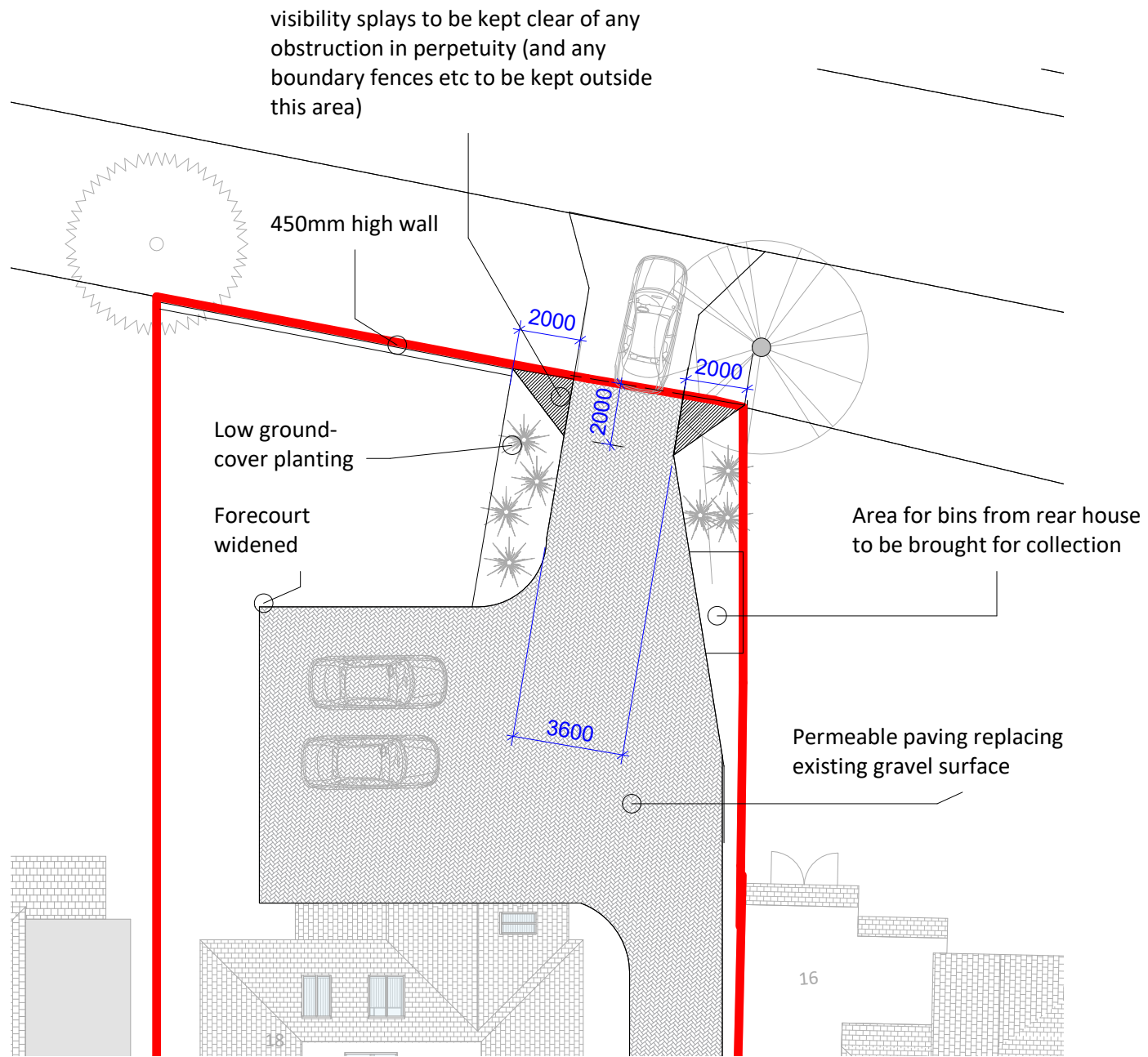
18 WAGGON ROAD- REAR PLOT	A3 @	1 : 500	03.08.2020	A3656 53 112
PROPOSALS: SITE ENTRANCE	www.argent-architects.co.uk tel 01834 845440		<b>ARGENT ARCHITECTS</b> admin@argent-architects.co.uk 	



A3 @	03.08.2020	A3656 53 001A
1 : 500		
18 WAGGON ROAD- REAR PLOT		
PROPOSALS: PROPOSED BLOCK PLAN		
www.argent-architects.co.uk	tel 01834 845440	
info@argent-architects.co.uk	fax 01834 845440	



T26	A3 @	1 : 100	03.08.2020	A3656 53 109A
18 WAGGON ROAD- REAR PLOT		www.argent-architects.co.uk tel 01834 845440		
PROPOSALS: FRONT GARDEN PLAN		<b>ARGENT ARCHITECTS</b> <small>admin@argent-architects.co.uk</small> 		

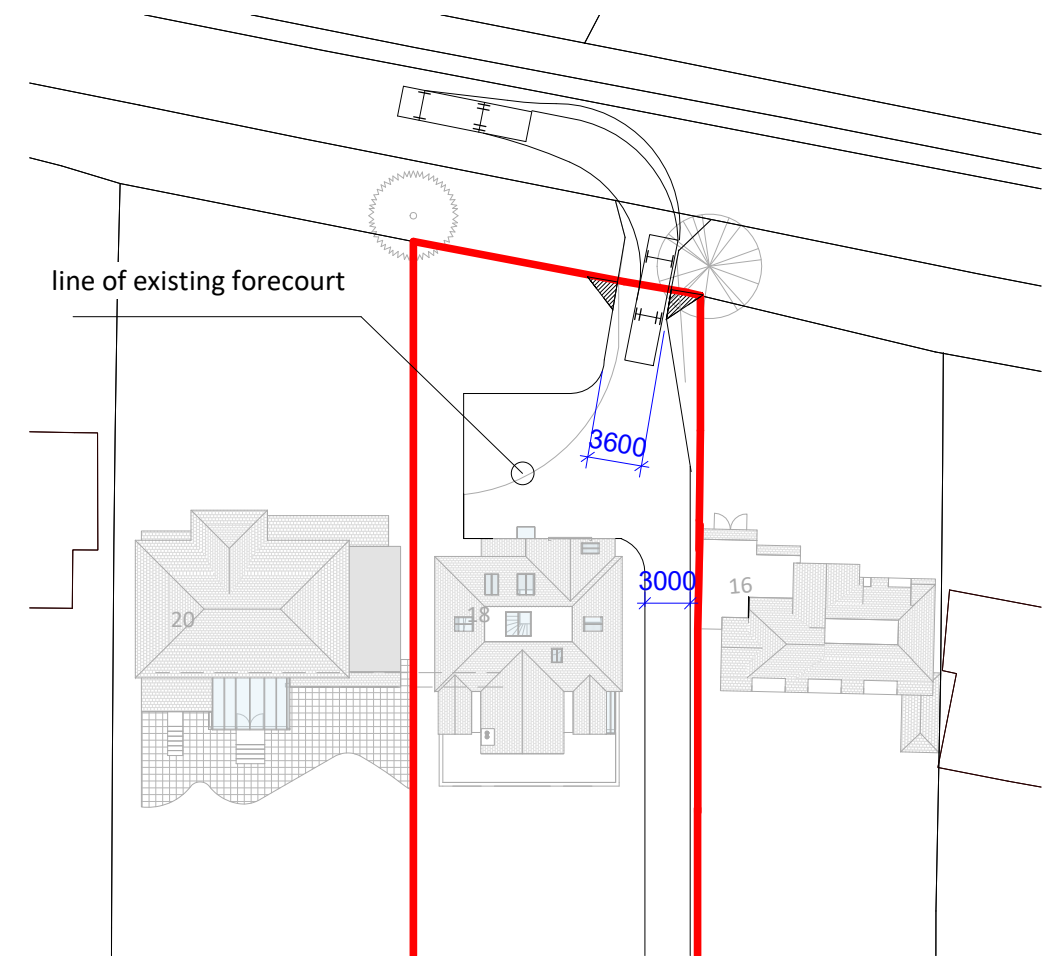


Forecourt layout with visibility splays, scale 1:200



view of site entrance in existing condition

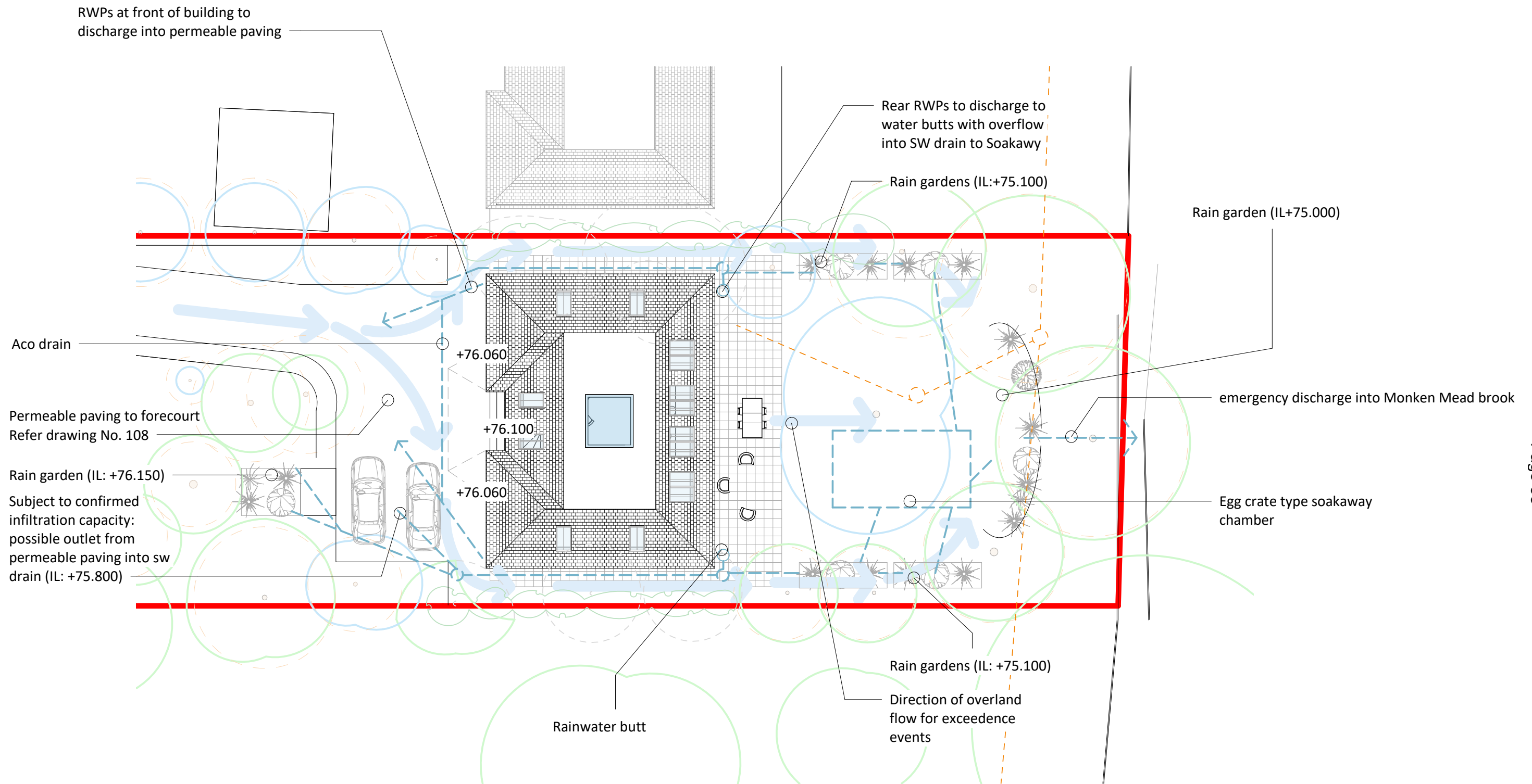
diagram demonstrating how a fire-appliance would reverse into the site




Fire tender access, scale 1:500

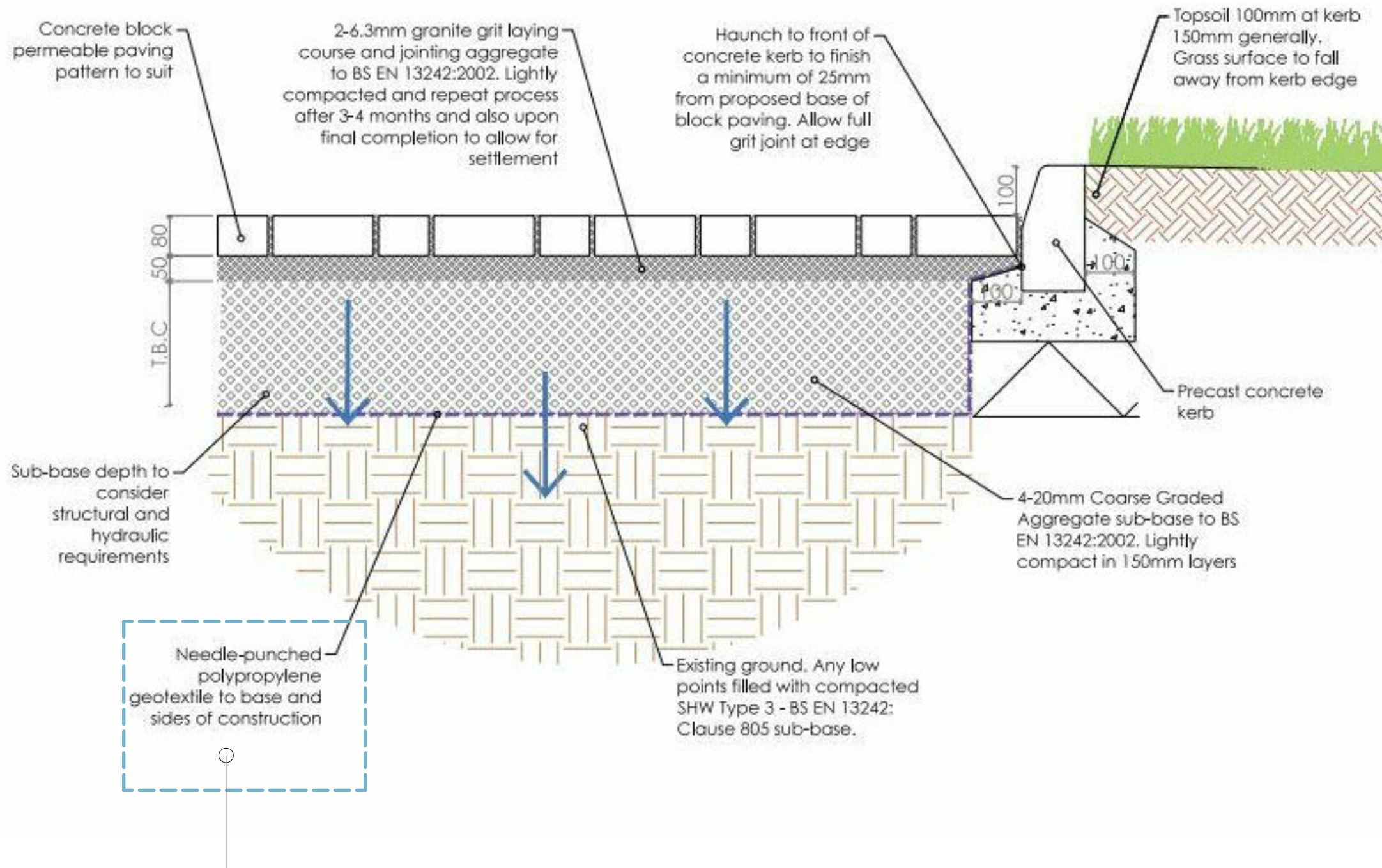
18 WAGGON ROAD- REAR PLOT		A3 @	As indicated	03.08.2020	A3656 53 112A
PROPOSALS: SITE ENTRANCE		www.argent-architects.co.uk tel 01834 845440			
		admin@argent-architects.co.uk			






18 WAGGON ROAD- REAR PLOT	A3 @	03.08.2020	A3656 53 113
	1 : 200		
PROPOSALS: DRAINAGE PLAN	www.argent-architects.co.uk tel 01834 845440		
		ARGENT ARCHITECTS	
		admin@argent-architects.co.uk	

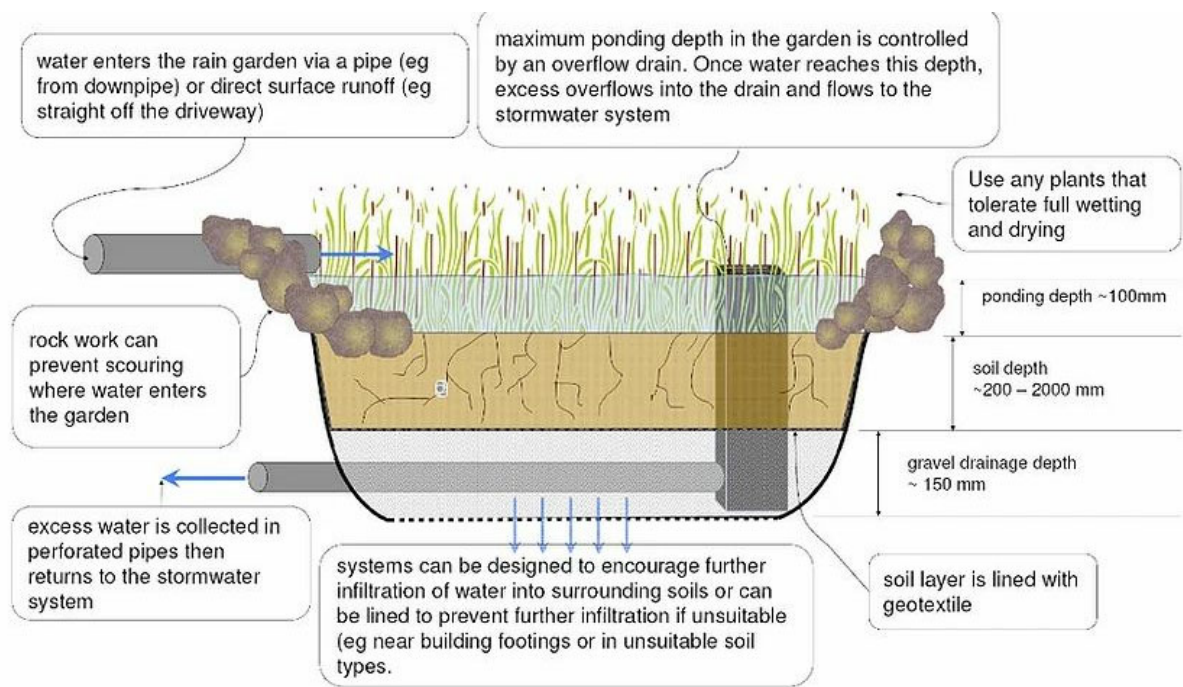
**Detail 1 - Permeable Paving (System A) with Total Infiltration**



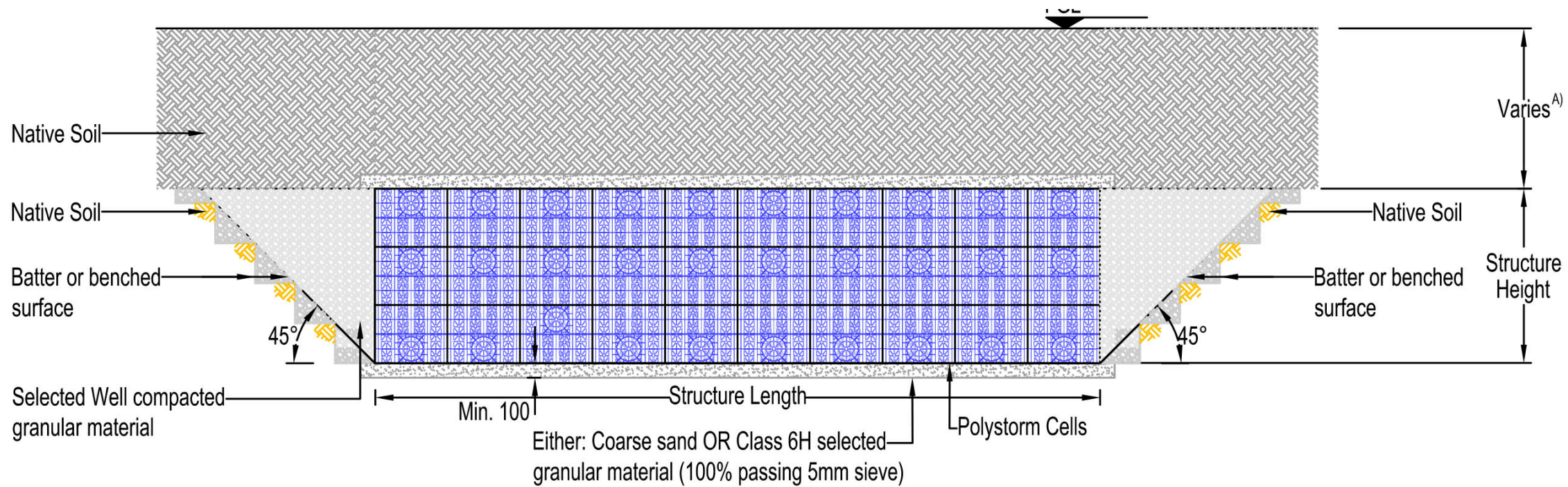
NB. Geotex membrane is needle punched to provide total infiltration\*

\*Subject to the results of a percolation test, an outlet to a storage system may be required


18 WAGGON ROAD- REAR PLOT	A3 @	03.08.2020	A3656 53 201
PROPOSALS: BUILD UP OF FORECOURT AREA	www.argent-architects.co.uk admin@argent-architects.co.uk	tel 01834 845440	



Rain garden cross section



Soakaway cross section

18 WAGGON ROAD- REAR PLOT	A3 @	03.08.2020	A3656 53 202
PROPOSALS: RAIN GARDEN & SOAKAWAY DETAILS	www.argent-architects.co.uk admin@argent-architects.co.uk	tel 01834 845440	

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## LONDON BOROUGH OF ENFIELD

### PLANNING COMMITTEE

**Date:** 18 January 2022

**Report of:**

Head of Planning  
Vincent Lacovara

**Contact Officers:**

Andy Higham  
Gideon Whittingham

**Ward:**

Winchmore Hill

**Application Number:** 19/01988/FUL

**Category:** Minor Dwellings

**LOCATION:** St Monica's Hall, 521 Green Lanes, London, N13 4DH

**PROPOSAL:** Redevelopment of site involving demolition of existing building and ancillary structures and erection of part 2, part 3 storey building with basement level to provide new church hall with parish community facilities and 6 x 2 bed self contained flats with associated landscaping.

**Applicant Name & Address:**

Fr. Mehall Lowry  
Diocese Palmers Green  
Presbytery  
1 Stonard Road  
Southgate  
N13 4DJ

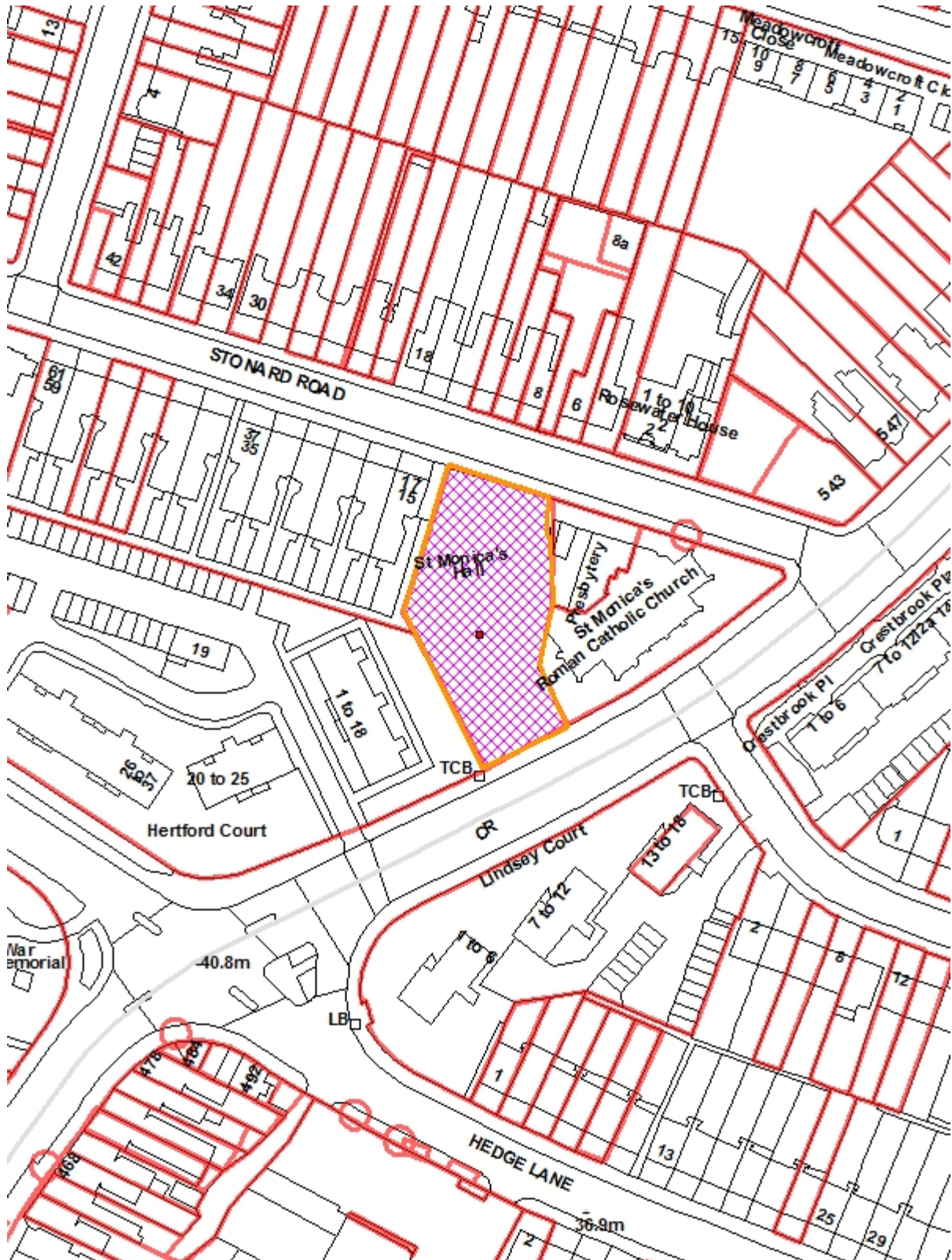
**Agent Name & Address:**

Mr Colin Smart  
Kyle Smart Associates  
The Barn  
Butchers Wick  
Sewell  
Nr. Dunstable  
LU6 1RP

**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 be authorised to GRANT planning permission subject to conditions.
2. That the Head of Development Management be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

Ref: 19/01988/FUL LOCATION: St Monicas Hall, 521 Green Lanes, London, N13 4DH



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Scale 1:1250

North



## 1. Note for Members

- 1.1 Although a planning application of this nature can be determined under delegated authority, due to the issues raised and the level of public interest, the application was initially reported to Planning Committee for determination on 3 November 2020 and subsequently on 18 January 2022.
- 1.2 At the Planning Committee meeting on 3 November 2020, Members resolved that subject to the completion of a Section 106 legal agreement, planning permission be granted subject to the conditions set out in the report and requested by members at the meeting.
- 1.3 Following this meeting, the application was made subject to a holding direction while the Secretary of State reviewed the application to determine whether it should be called in for their determination. Enfield Council, the Local Planning Authority received confirmation from the Secretary of State in April 2021 that the application could be determined by the Council.
- 1.4 Concurrently, the Theatres Trust (who are a statutory consultee in respect of development proposals affecting Theatres) raised concerns about the decision making process regarding the proposal to redevelop St Monica's Hall / Intimate Theatre and specifically information provided to Planning Committee in respect of the status of the building as an Asset of Community Value both as a community centre and theatre, clarity on the comments of the GLA's Culture at Risk team and the fact they were objecting to the proposal and the absence of clear and compelling reasons to support the decision given the adopted policy position and objections received. As a result, the Theatres Trust indicated their intention to challenge any formal decision of the local planning authority to grant planning permission by judicial review. The opportunity has therefore been taken to review the assessment process to minimise such risk.

Having taken legal advice on this matter, the application was referred back to Planning Committee on 18 January 2022 for a fresh determination, with officers reassessing the proposal in light of current policy and supporting evidence. This included clarification as regards the status of the building as an Asset of Community Value and the position of the GLA.

- 1.5 At the Planning Committee meeting on 18 January 2022, Members raised concern as to the lack of a demountable stage and associated lighting and deferral of the decision was agreed (following a motion which was seconded and voted on), to enable further information to be brought to committee as regards this identified issue as there was concern to understand whether continuation of theatre use could be secured within the replacement building.
- 1.6 Following the Planning Committee on 18 January 2022, in consultation with stage specialists CPS Manufacturing Co., the applicants provided technical and supporting information in respect of a demountable stage and associated lighting, demonstrating not only that a historic use be secured within the replacement building, but also the flexibility to serve other community groups and for cultural activities. The supporting information included:

- A revised Design and Access Statement – detailing the experience of CPS Manufacturing Co and examples of temporary staging.
  - Proposed staging layout – indicating a 156-seater space within the large hall, with a demountable stage/lighting (with ramp) and storage area for said stage.
  - Proposed Section AA / Staging Layout – indicating the stage/lighting and seating arrangement
  - Views of potential temporary performance staging in main hall – CGIs of the stage and seating arrangement
- 1.7 In all other respects the proposed development will be the same as the scheme previously considered.
- 1.8 The reasons for recommending approval are:
- The proposed development would be consistent with the objectives of national, regional and local planning policy in terms of supporting community uses, securing sustainable growth and delivery of new housing stock within the borough;
  - The loss of the non-designated heritage asset would be offset by the delivery of a modern facility for the local community.
  - The development actively contributes towards both Borough specific and London-wide strategic housing targets.
  - The proposed building would be of high-quality design and make a positive contribution to the character and appearance of the area
  - The development would offer a flexible modern floorspace that can be used by community groups and for cultural activities, including staged performances for seated audiences.
  - The proposal would not result in conditions prejudicial to the free flow and safety of traffic on the adjoining highway.

## **2. Executive Summary**

- 2.1 The report seeks approval for the redevelopment of the site to provide a part 2, part 3 storey building (with basement level) to provide a church hall with parish community facilities (Use Class F1 (f) / F2 (b)) and 6 x 2 bed self-contained flats (Use Class C3) with associated parking, hard and soft landscaping, refuse and cycle storage, all associated with the adjacent to St. Monica's Roman Catholic Church.
- 2.2 The redevelopment of the site requires the demolition of the existing building and ancillary structures, currently used for parish community facilities and theatre use (Use Class F2 (b)).



- 2.3 The proposal would result in the loss of the existing building identified as an Asset of Community Value, a non-designated heritage asset which is included on Enfield's Local Heritage Listed and a building included on the Theatre's Trust list of Theatres at Risk.
- 2.4 However, the harm from the loss of the existing building and associated uses is considered to be offset by the proposed development delivering a high standard of design that would respect local context and character, the meaningful contribution in meeting or exceeding requirements in respect of a modern facility for the local community and the contribution towards the Borough and wider London housing needs, helping Enfield to support its growing population.
- 2.5 The delivery of a flexible modern facility for the local community, capable of hosting staged theatre performances for seated audiences, is also supported in strategic and placemaking terms. The existing facility requires significant investment for prospective theatre productions; indeed, this has been indicated as a major factor for the relocation of previous productions to more modern facilities. The purpose built, modernised facility for the local community, that would be capable of hosting theatre performances amongst other art and cultural uses, would provide future occupiers with sufficient flexibility to ensure the long-term viability of the site, safeguarding an existing community use in the borough that meets more modern needs and should be afforded substantial weight in the determination of the application.
- 2.6 The delivery of housing is also supported at all planning policy levels, nationally, London-wide and within Enfield's adopted development plan policies and should be afforded substantial weight in the determination of the application.

### **3. Recommendation**

- 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 be authorised to GRANT planning permission subject to conditions to cover the following matters:
1. Time Limited Permission
  2. Development to be carried out in accordance with approved plans and documents.
  3. Details of External Materials
  4. Heritage – potential display of original buildings features
  5. Details/Specifications of Rooftop Equipment
  6. Details of Acoustic Assessment / sound insulation
  7. Details of Servicing and Waste Management
  8. Details of Cycle Parking
  9. Details of parking provision (vehicle and cycle), gate positioning, refuse and recycling
  10. Details of air quality assessment
  11. Details of Bat Survey
  12. Details of Biodiversity enhancements
  13. Details of SuDS Strategy
  14. SuDS Verification Report
  15. Details of Energy Statement
  16. Details of Potable Water

17. Details of extract duct/rooftop plant
18. Details of Contamination
19. Prior to above ground works – Hard and soft landscaping details
20. Commercial /Residential Use restriction
21. Tree protection of retained and adjacent trees
22. Service management plan
23. Car parking management plan
24. Construction management plan – including hours for delivery of materials
25. Control of Dust and Emissions During Construction and Demolition (NRMM)
26. No use of roof as a terrace / maintenance purpose only
27. Upper floor residential flank windows obscured
28. Compliance with Part M4 (2) Building Regulations
29. Details of availability of the hall to the wider community
30. Details of communal amenity space - including management details
31. Demolition Statement
32. Operational Management Plan - Hours of Opening for commercial element

- 3.2 That the Head of Development Management 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 comprises Saint Monica's Hall, located adjacent to Saint Monica's Church at the junction of Stonard Road and Green Lanes in Palmers Green. To the east of the site, the building shares an open border with Saint Monica's Church, whilst to the north west is the boundary of No. 15 Stonard Road, an end of terrace Edwardian dwellinghouse and the communal gardens of Hertford Court to the south west.
- 4.2 The main entrance is off Green Lanes via the shared carpark with the Saint Monica's Church, however informal off-street parking is also accessed via Stonard Road.
- 4.3 The site is irregular in shape and approximately 1,490 square metres in size.
- 4.4 The site is located in the Winchmore Hill Ward.
- 4.5 The following policy designations / characteristics apply to the site:
- Saint Monica's Hall was designated as an Asset of Community Value in 2018, following nomination by the 'Save the Intimate Theatre Group'.
  - Saint Monica's Hall has been included on Enfield's Local Heritage List as a non-designated heritage asset since 2018.
  - Saint Monica's Hall has been included on the Theatres at Risk Register since 2019 and remains on the newly published 2022 register.
  - Saint Monica's Hall has been added to the Mayor of London's "Culture at Risk" register.

- 4.6 The building is not located in a Conservation Area, nor it a Listed building. The adjacent Saint Monica's Church was built to the designs of Edward Goldie in 1914 and is a non-designated heritage asset (NDHA) of architectural, communal and historic value, albeit it has not been included in the published Enfield's Local Heritage List.

*Historical background of Saint Monica's Hall*

- 4.7 Built in 1930-31 and designed by the architect Charles E Hanscomb, Saint Monica's Church Hall replaced the original tin tabernacle church which had been erected in 1912. Opened, in 1931, the building was designed for a wide range of community uses ancillary to Saint Monica's Church, and featured a sprung dance floor, projection room, stage, billiard room, committee rooms and a smaller hall and a bar.
- 4.8 In 1935, the building was leased from the church authorities to the John Clements repertory theatre company and was renamed the Intimate Theatre. In 1936, a number of internal alterations were made which included installing fixed tip-up theatre seating in the gallery, stalls and possibly the installation of the proscenium arch. The repertory theatre flourished during the late 1930s and during the Second World War when it largely remained in operation. In 1941 the lease was taken over by Frederick Marlow's GM Productions and it continued in use as a professional repertory theatre.
- 4.9 In 1946, a production at the theatre of 'George and Margaret', a comedy by Gerald Savory, was the first complete play broadcast live on television by the BBC, and a world first.
- 4.10 Over the following two decades theatre hall attendances declined, largely due to competition from television, and by 1964 the Intimate Theatre was the only professional repertory theatre in London. Despite being taken on by a number of different production companies, and having local council support, in 1970 the operation of the building reverted back to a parish community hall. Local amateur drama groups maintained the limited use of the building as a theatre, with some professional productions such as the annual pantomime.
- 4.11 Following the grant of planning permission in 1988 (see relevant planning decisions), the building modified into a parish community hall, incorporating a smaller theatre whereby limited amateur productions have been performed and serve as facilities for arts and social centre activities.
- 4.12 A subsequent application was granted in 1991 (see relevant planning decisions), for the redevelopment of site by way of the demolition of the existing building and erection of single storey community centre. This permission has since expired unimplemented.
- 4.13 Based on the operation of the authorised use of the site in 1988, the site is understood as Use Class F2 (b).

## **5. Proposal**

- 5.1 This is an application for the redevelopment of the site requiring the demolition of the existing community building (Use Class F2 (b) - 750sqm) for the construction of a two storey (including basement) place of worship / parish community use building (Use Class F1 (f) / F2 (b) - 905sqm) fronting but recessed from Green Lanes, along with the construction of a three-storey residential building (Use Class C3), comprising 6 x 2 bedroom 3 person flats fronting Stonard Road.
- 5.2 The community use building, to be primarily accessed off Green Lanes, would serve as a parish centre with flexible spaces and dedicated kitchen facilities across the two upper floors. The basement would serve as an area for storage and plant. The ground floor would serve as a hall (240sqm) with a general capacity of 220 persons and a demountable staged performance capacity of 156 seated persons, with associated meeting rooms for up to 17 persons, café / bar, kitchen and bathroom facilities, accessed via the foyer off Green Lanes. The first floor would serve 3no. meeting rooms with a total capacity for 59 persons and associated office / tearoom / bathroom facilities. The roof would feature PV panels and rooflights with access afforded for maintenance only. Between Saint Monica's Church and the proposed building would be an outdoor amenity space associated with the parish community offer.
- 5.3 The residential building, to be accessed off Stonard Road, would be three storeys and contain 6 x 2-bedroom 3 person flats, two on each level.
- 5.4 A total of 12 off-street parking spaces would be provided (2 on Stonard Road, the remainder off Green Lanes including 2 disabled bays). Cycle parking (16no.) would be located across the site for the parish community and residential users.
- 5.5 Associated refuse and recycling storage are located off Green Lanes for the parish community use and Stonard Road for the residential users.
- 5.6 The building would feature a brick façade with decorative brick profiles to emphasise the window openings and the circulation space.

## **6. Relevant Planning Decisions**

- 6.1 TP/91/1061: Redevelopment of site by demolition of existing building and erection of single storey community centre. (outline) Granted with Conditions 21.09.1992. The Officer Report states:

*Planning permission was granted in 1988 for the change of use of the premises from a theatre to a parish community centre, incorporating a smaller theatre and facilities for arts, crafts, discussion groups and social centre activities.*

*The current application proposes the demolition of the existing building which is in a poor structural condition and the erection of a new single storey building to be used as a community centre. The application is submitted in outline with siting of the building and means of access only to be considered at this stage. An indication as to the massing of the building has been submitted for information purposes.*

*The proposed building would incorporate a hall with a seating capacity of 200 persons; a bar; a kitchen and coffee lounge; four committee rooms and a stage with changing rooms. The facilities would be available for arts and crafts; discussion groups and general social centre activities as well as some theatrical performances. It is estimated that the usage would be approximately 2/3 social and centre and 1/3 theatrical.*

*The proposals have been amended to reduce the bulk and site coverage of the proposed building and to improve car parking and circulation. Vehicular access is now proposed off Stonard Road with the provision of 34 parking spaces compared with the Council's standards, the Borough Engineer objection does not recommend that the proposal be refused on these grounds.*

*The proposals provide a satisfactory form of development which would have no unreasonable effect on adjoining properties and cater for worthwhile community service provision on the site with hall and stage facilities which may be used for theatrical performances.*

*The proposals are accordingly recommended for approval.*

- 6.2 TP/87/2047: Change of use of premises from theatre to parish community centre incorporating smaller theatre and facilities for arts crafts discussion groups and social centre activities. Granted with Conditions 08.11.1988
- 6.3 TP/68/0215: Erection of a garage. Granted with Conditions 08.04.1968
- 6.4 SOUTHGATE\_1901: New safety curtains. Grant 14.05.1956

## **7. Consultation**

### Public Consultation:

- 7.1 In accordance with the Enfield Statement of Community Involvement in Planning (2020), consultation on the application involved notification letters being sent to 101 neighbouring properties on 27.10.2020 (giving people 21-days to respond).

### *Objections*

- 7.2 A total of 50 letters and a petition comprising 4,513 signatures objecting to the development were received.

### *Support*

- 7.3 A total of 24 letters and a petition comprising 1,500 signatures supporting the development were received.

7.4 The matters of objection raised were as follows:

*Use / Designation*

- Importance of heritage value
- Loss of professional and local theatre performances
- Loss of income from shows including for charities
- Should not be demolished but rather improvements and renovations made to the building to serve both the parish, the community and still operate as a theatre.
- There will be no public access to the new building as the building is intended for the use of the church and congregation only

*Design*

- Out of keeping with character of the area
- Does not respect the character and appearance of the existing building
- Inappropriate design in terms of scale and use of materials

*Transport*

- Insufficient parking spaces. Strain on community facilities, increase in traffic

7.5 The matters of support raised were as follows:

*Use / Designation*

- The new hall will greatly increase the amount of usable floor area and sub dividable spaces to create a parish centre that is more efficient and accessible.
- The present building is not fit for purpose either as a church hall or a theatre.
- Provide a new modern, energy efficient and sustainable building for parishioners and the wider community.
- Improved facilities i.e. kitchen and toilets, meeting rooms, dedicated offices for parish members;
- Accessible - Step free access and lift;
- Flexible spaces within the building
- With the improved facilities at the Dugdale Centre and local Millfield Theatre, there are alternatives in place.

*Design*

- Good design

*Housing*

- Meeting community housing needs

*Sustainability*

- Building with a lower carbon footprint

*Safety*

- Potential areas of antisocial behaviour, such as alleyways and unilluminated spaces have been designed out

External Consultees\*:

- 7.6 **Culture at Risk Office, GLA** – The office sits within the Culture and Creative Industries Unit at the Greater London Authority, and provides focussed advice on culture and creative uses, cultural heritage and cultural infrastructure.

Objection raised. In summary, concerns raised related to the following:

*Safeguarding cultural infrastructure* – The building is a unique cultural asset that should be preserved, celebrated and made available for the continued use of local community groups. The London Plan Policy HC5 Supporting London's culture and creative industries calls for the protection of existing cultural venues, facilities and uses. It is their understanding that the proposals for a mixed-use flexible community space as a re-provision of this asset limits the potential for theatre production and does not match the same quality of dedicated theatre space that currently exists.

*Recovery Mission*

In response to the COVID-19 crisis, the Mayor is working with London councils and other key stakeholders to develop a series of Recovery Missions for London. The High Streets for All Recovery Mission is a commitment aimed at partnership working between public authorities, community groups and the private sector to safeguard and directly deliver a diverse, resilient and thriving mix of High street and town centre activity within easy reach of all Londoners. It is the view of the Culture at Risk Office that the retention of the historic Intimate Theatre presents a rare opportunity to respond to this timely mission by safeguarding a valuable and historic cultural asset for benefit of the local community.

- 7.7 **Theatres Trust** – The national advisory public body for theatres, a statutory consultee on theatres in the planning system, and operates as a charity.

Objection raised. In summary, concerns raised related to the following:

Proposal to result in the loss of theatre function without adequate demonstration or evidence it is no longer required and cannot be retained either within the existing building (preferred) or re-provided within the new development, and the loss of an undesignated (locally listed) heritage asset with great character, history and significance which has the potential to be retained.

- 7.8 **The Department for Levelling Up, Housing and Communities** (formerly the Ministry for Housing, Communities and Local Government).

9 December 2020 – the Secretary of State comments that 'In exercise of his powers under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Secretary of State hereby directs your Council not to grant permission on this application without specific authorisation'.

01 April 2021, the Secretary of State comments that ‘In deciding whether to call in this application, the Secretary of State has considered his policy on calling in planning applications. This policy gives examples of the types of issues which may lead him to conclude, in his opinion that the application should be called in. The Secretary of State has decided not to call in this application. He is content that it should be determined by the local planning authority’.

- 7.9 \*It should be noted that several communications took place with each consultee and the above is a summary overall.

Internal Consultees:

- 7.10 Transportation: No objection (within body of report)
- 7.11 SuDS: No objection (within body of report)
- 7.12 Environmental Health: No objection (within body of report)
- 7.13 Heritage / Conservation: Comment (within body of report)

**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.

8.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out national planning policy objectives. It introduces a presumption in favour of sustainable development, which is identified as having three dimensions - an economic role, a social role and an environmental role. Other key relevant policy objectives are referred to as appropriate in this report

The London Plan 2021

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

- GG1 Building Strong and Inclusive Communities
- GG2 Making the Best Use of Land
- GG3 Creating a Healthy City
- GG4 Delivering the Homes Londoners Need
- GG6 Increasing efficiency and resilience
- D1 London’s form, character and capacity for growth
- D2: Infrastructure Requirements for Sustainable Densities
- 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
- D10: Basement development
- D11 Safety, Security and Resilience to Emergency
- D12 Fire Safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing Housing Supply:
- H4 Delivering Affordable Housing
- H10 Housing Size Mix
- S1 Developing London's social infrastructure
- HC1 Heritage Conservation and Growth
- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy
- G1 Green Infrastructure
- G5 Urban Greening
- G6 Biodiversity and Access to Nature
- G7 Trees and Woodlands
- SI1 Improving Air Quality
- SI2 Minimising Greenhouse Gas Emissions
- SI3 Energy Infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI7 Reducing Waste and Supporting the Circular Economy
- SI 8 Waste capacity and net waste self-sufficiency
- 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
- T7 Deliveries, servicing and construction
- T9 Funding Transport Infrastructure Through Planning
- DF1 Delivery of the Plan and Planning Obligations

Local Plan – Core Strategy (2010)

- 8.3 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.
- 8.4 The following local plan Core Strategy policies are considered particularly relevant:
  - CP 2: Housing Supply and Locations for New Homes
  - CP 3: Affordable Housing
  - CP 4: Housing Quality
  - CP 5: Housing Types
  - CP 6: Housing Need
  - CP 9: Supporting Community Cohesion
  - CP 11: Recreation, Leisure, Culture and the Arts
  - CP 20: Sustainable Energy Use and Energy Infrastructure
  - CP 21: Delivering Sustainable Water Supply, Drainage Sewerage Infrastructure

CP 22:	Delivering Sustainable Waste Management
CP 24:	The Road Network
CP 25:	Pedestrians and Cyclists
CP 26:	Public Transport
CP 28:	Managing Flood Risk Through Development
CP 29:	Flood Management Infrastructure
CP 30:	Maintaining and Improving the Quality of the Built and Open Environment
CP 31:	Built and Landscape Heritage
CP 32:	Pollution
CP 36:	Biodiversity

Local Plan - Development Management Document (2014)

8.5 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:

DMD 3:	Providing a Mix of Different Sized Homes
DMD 6:	Residential Character
DMD 8:	General Standards for New Residential Development
DMD 9:	Amenity Space
DMD10:	Distancing
DMD 37:	Achieving High Quality and Design-Led Development
DMD 38:	Design Process
DMD 44:	Conserving and Enhancing Heritage Assets
DMD 45:	Parking Standards and Layout
DMD 47:	New Road, Access and Servicing
DMD 48:	Transport Assessments
DMD 49:	Sustainable Design and Construction Statements
DMD 50:	Environmental Assessments Method
DMD 51:	Energy Efficiency Standards
DMD 52:	Decentralized Energy Networks
DMD 53:	Low and Zero Carbon Technology
DMD 54:	Allowable Solutions
DMD 56:	Heating and Cooling
DMD 57:	Responsible Sourcing of Materials, Waste Minimisation
DMD 58:	Water Efficiency
DMD 59:	Avoiding and Reducing Flood Risk
DMD 60:	Assessing Flood Risk
DMD 61:	Managing surface water
DMD 62:	Flood Control and Mitigation Measures
DMD 64:	Pollution Control and Assessment
DMD 65:	Air Quality
DMD 68:	Noise
DMD 69:	Light Pollution
DMD 70:	Water Quality
DMD 79:	Ecological Enhancements
DMD 80:	Trees on Development Sites
DMD 81:	Landscaping

Enfield Draft New Local Plan

- 8.6 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.
- 8.7 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.
- 8.8 Key emerging policies from the plan are listed below:

DM SE2:	Sustainable design and construction
DM SE3:	Whole-life carbon and circular economy
DM SE4:	Reducing energy demand
DM SE5:	Greenhouse gas emissions and low carbon energy supply
DM SE6:	Renewable energy development
DM SE7:	Climate change adaptation and managing heat risk
DM SE8:	Managing flood risk
DM SE10:	Sustainable drainage systems
SP SC1:	Improving health and wellbeing of Enfield's diverse communities
SC2:	Protecting and enhancing social and community infrastructure
BG3:	Biodiversity net gain, rewilding and offsetting
DE1:	Delivering a well-designed, high quality and resilient environment
DM DE2:	Design process and Design Review Panel
DM DE3:	Inclusive design
DM DE4:	Putting heritage at the centre of place making
DM DE7:	Creating liveable, inclusive and quality public realm
DM DE8:	Design of premises
DM DE10:	Conserving and enhancing heritage assets
DM DE11:	Landscape design
DM DE13:	Housing standards and design
DM DE14:	External amenity standards
DM DE15:	Residential extensions
DM H3:	Housing mix and type
CL1:	Promoting culture and creativity

Other Material Considerations and guidance

- 8.9 The following guidance is also considered particularly relevant:
- Enfield Climate Action Plan (2020)
  - Enfield Housing and Growth Strategy (2020)
  - Enfield Intermediate Housing Policy (2020)
  - Enfield Biodiversity Action Plan
  - Enfield Local Heritage List (May 2018)
  - Enfield S106 SPD (2016)
  - Enfield Decentralised Energy Network Technical Specification SPD (2015)
  - Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
  - London Councils: Air Quality and Planning Guidance (2007)
  - TfL London Cycle Design Standards (2014)
  - GLA: The Control of Dust and Emissions during Construction and

Demolition SPG (2014)  
GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)  
GLA: Social Infrastructure SPG (2015)  
GLA: Housing SPG (2016)  
GLA: Cultural Infrastructure Plan: A Call to Action (2019)  
Healthy Streets for London (2017)  
Manual for Streets 1 & 2, Inclusive Mobility (2005)  
National Design Guide (2019)

## **9. Assessment**

- 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 Running alongside this is the presumption in favour of sustainable development that is the at the heart of the National Planning Policy Framework – NPPF (paragraph 11). The NPPF (paragraph 120) also advocates the promotion and support the development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 9.3 The main planning issues raised by the Proposed Development are:
- Principle of Development (Land Use / Heritage Considerations)
  - Housing Need and Delivery
  - Housing Mix
  - Residential Quality and Amenity
  - Design (impact upon adjacent NDHA)
  - Neighbouring Amenity
  - Transport
  - Trees and Landscaping
  - Water Resources, Flood Risk and Drainage
  - Environmental Considerations
  - Community Infrastructure Levy and S106

### **Principle of Development (Land Use / Heritage Considerations)**

#### *Demolition of Non-Designated Heritage Asset*

- 9.4 Paragraph 195 of the NPPF requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting its setting), taking account of the available evidence and any necessary expertise (i.e. statutory & non statutory consultees). Paragraph 189 of the NPPF states that Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. That assessment should then be taken into account when considering the impact of the proposal on the heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

- 9.5 Paragraph 197 of the NPPF provides that in determining planning applications affecting heritage assets, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 9.6 With regard to non-designated heritage assets, paragraph 203 of the NPPF advises 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 directly or indirectly affect 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. Local planning authorities (Paragraph 204) should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 9.7 Unlike paragraphs 195-197 and 200-202, paragraph 203 does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter. It requires a balanced judgement to be made by the decision maker, as set by Nathalie Lieven QC in the *Dorothy Bohm v SSCLG* ([2017] EWHC 3217 (Admin)) high court judgement.
- 9.8 London Plan Policy 2021 HC1 'Heritage conservation and growth' 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 London Plan outlines that heritage assets are valued components of the historic environment. They include buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of historic significance meriting consideration in planning decisions. They include both designated heritage assets and non-designated assets where these have been identified by the local authority (including local listing) during the process of decision-making or plan making.
- 9.9 Core Policy 31 (Built and Landscape Heritage) requires that special regard be had to the impacts of development on heritage assets and their settings, whilst Core Policy 30 supports high-quality and design-led public realm.
- 9.10 DMD 44 (Preserving and Enhancing Heritage Assets) requires that developments should conserve and enhance the special interest, significance or setting of a heritage asset.
- 9.11 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.

9.12 Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) outlines the positive approach to managing heritage.

9.13 Saint Monica's Hall has been included on Enfield's Local Heritage List as a non-designated heritage asset since 2018. The significance is stated as Rarity, Historic Association, Landmark Status, Social Value, Creative Association, whilst the description is as follows:

*The Intimate Theatre is the home of John Clements Theatre company, and the site of the first play ever to have been broadcast live on television. By the end of the 60s it had become the last repertory theatre surviving in London. The theatre still plays host to a range of dramatic and operatic societies, and local events. Many famous people appeared on stage here, including Richard Attenborough (who made his stage debut), Irene Handl, Anna Wing, Nicholas Parsons, Roger Moore, Arthur Lowe, Bill Owen, John Inman, Dad's Army writer Jimmy Perry and his wife Gilda, Tony Blackburn, Stephen Berkoff, Davy Graham, David Bowie, The Wurzels, Joe Brown, George Melly, Tommy Trinder, Hinge and Bracket, and, in panto Bill Pertwee, Ruth Madoc, and John Noakes. Stevie Smith attended regularly. John Clements was knighted for his contribution to film and stage - Bristol University holds an archive in his memory. One of the last local theatres left in London. Two storey frontage red brick with stone quoins and window surrounds.*

9.14 The Council's specialist Conservation Officer advises that the existing building is a rare survivor of a repertory theatre building of the inter-war period, in addition to being one of the last remaining local theatres in London. The theatre is a well-known landmark on Green Lanes and makes an important contribution to the local street scene and can be clearly viewed on the approach from both directions. Internally, a virtually unaltered plan survives with many intact original features and fittings, including a formal stage with ornamental proscenium arch featuring sunburst and flanked by plaster. The safety curtain (circa 1935) bears the masks of Comedy and Tragedy and figures from classical drama. There are limited flying facilities, original gas lit exit signs, dressing rooms, and rehearsal spaces. In the auditorium, the fixed seating in the stalls and orchestra pit were removed in 1989 and replaced with movable seating.

9.15 To inform this planning assessment, the applicant has submitted a Heritage Statement which sets out the rationale for the approach to the approved development. In particular, it contains an analysis of different options for refurbishment / redevelopment to support the approach advocated in this proposal and looks at the benefits of the proposed facility.

9.16 With reference to national planning advice and policies contained in the development plan, the Historic Assessment states that:

*St. Monica's Hall is not an overly elaborate or high-quality example of its type. The intrinsic design value of the building is limited as it is considered to be a modest and functional building that broadly reflects that of the neighbouring presbytery but is less refined. The overall composition of the building is poor with a lack of detailing and awkward juxtaposition of flat roofed wings with the pitched roof and gable ends of the main hall. The north elevation of the building, with blank frontages to Stonard Road and garage and refuse storage, is considered to detract from the appearance of the existing streetscape.*

*The building includes some notable internal fixtures and fittings such as a proscenium arch, gallery seating and gas lights installed when the building was in use as a theatre. These have survived since the building reverted back to its main original use as a parish community centre and are rudimentary features of some architectural value that reflect the historic use of the building as a theatre.*

*The historic use of the building as the Intimate Theatre contributes to the 'collective memory' of the Site and the historic use of the building as a professional and amateur theatre has communal and symbolic significance for the people who relate to that use and draw part of their identity from it. Although the building was not originally used as a theatre, has not been used as a professional theatre since 1969, has not hosted a professional pantomime since 1988 and the use of St. Monica's Hall for local theatre productions has been a relatively small proportion of the overall recent use of the building, the memory of the use of the building as a theatre still resonates with those that know of it and contributes to the communal value of the building.*

*The historic use of the building as the Intimate Theatre is of local historical value and this is reflected in the building being included on the latest version (May 2018) of the Council's Local Heritage List.*

*St. Monica's Hall was constructed for, and has always been in the ownership of, the church and the use of the building as a parish community centre is a key and ongoing facet of its local interest and communal value.*

- 9.17 A further consideration in connection with its historic significance is a request to Historic England in 2019 to add the Intimate Theatre / Saint Monica's Hall to the statutory list of designated heritage assets. After review, Historic England did not accept this request and commented that:

*There is clearly some historical interest to the building. As the venue for the first live television broadcast of a complete play in 1946 it is certainly of note. However, this has to be seen in the context of the development of television and cannot be regarded as having the same special interest as the first BBC television broadcast from Alexandra Palace in 1936. Similarly, although the Intimate Theatre can boast an impressive list of actors who have appeared on its stage (including a number of notable debuts including Sir Richard Attenborough and a mime performance by David Bowie), such is true of the vast majority of theatres and the Selection Guide specifically recognises that this constitutes lesser interest. As one of the last commercial repertory theatres in London the Intimate Theatre has clear local interest but is of limited significance in the history of theatre since repertory companies still exist today, albeit of much less importance that they were in their heyday between the 1930s and 1950s.*

*Overall, this is an interesting building with a varied history and has a great deal of local affection. However, although it survives well, architecturally it lacks the degree of special interest that would be expected from a cultural or entertainment building of this relatively late date. Externally it is competent but lacks a cohesive character, and internally, despite the survival of a number of interesting features, it is not innovative in terms of theatre development and lacks a clearly defined sense of space resulting from its multi-purpose origins. Historically, the building has a number of claims to interest but these are either*

*local in nature or not of such interest that they override the lack of architectural special interest.*

*After examining all the available records and other relevant information and having carefully considered the architectural and historic interest of this case, the criteria for listing are not fulfilled. St Monica's Church Hall is, however, of clear local interest as a long-standing theatrical venue with close ties to the local community and a proud theatrical history as well as for its community history as the hall for the local Catholic church.*

*They conclude that St Monica's Church, Hall, also previously known as the Intimate Theatre, 521 Green Lanes, Palmers Green, built as a church hall in 1930-31 to designs by Charles E Hanscomb, is not recommended for listing for the following principal reasons:*

*Degree of architectural interest:*

- a competent but undistinguished inter-war building by a local architect. Externally it lacks architectural cohesion and quality of detailing. Internally, although surviving well and with some interesting features, it is not noteworthy as a performance space;*
- it has no claims to innovation in terms of planning or theatrical development.*

*Degree of historical interest:*

- although it has an interesting history, this is not considered to provide special interest in a national context or to compensate for the overall lack of architectural interest.*

- 9.18 The scheme proposes the redevelopment of the site, including the demolition of the existing Saint Monica's Hall. It is uncontested that, by demolishing the entire building, any effect on the building's heritage significance would be total.
- 9.19 However, whilst the objectives of Core Policy 31 and DMD Policy 44 are acknowledged, weight is given to the fact that no national significance was identified and thus, the effect of the loss at a local level must and has been considered as part of this report. The main heritage policy considerations for this Site are the effect of the proposals on the locally listed Saint Monica's Hall.
- 9.20 It must be emphasised however that Local listing provides no additional planning controls and the total site could be demolished under permitted development rights including any internal features, but it is a material consideration when determining the outcome of a planning application.
- 9.21 In making this assessment, as previously mentioned, paragraph 203 of the NPPF calls for the consideration of the application with regard to the scale of any harm or loss and the significance of the heritage asset. It is reiterated that locally listed buildings (non-designated heritage assets) do not attract the same 'great weight' attributed to designated heritage assets (e.g. listed buildings).



- 9.22 A further consideration is the fact that building is on the Theatres Trust "Theatres at risk register. The Theatres Trust is a statutory consultee and a national advisory public body for theatres and were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre. Significant weight must be given to their comments as part of the overall assessment.
- 9.23 The Theatres Trust appreciates that although not directly a church use the site's theatre function is valued by local people as demonstrated by its designation as an Asset of Community Value and is a means of bringing the community, backed up by the 4,513 signature petition and 50 individual responses objecting to its loss, and additional revenue into the building. The Trust therefore advises that the current development proposals should represent an opportunity to make better use of the existing facility and in the absence of justification to support the scheme all options have been explored and they object to the development. Moreover, even if demolition is accepted, adequate re-provision should be secured.

*Conclusion*

- 9.24 Saint Monica's Hall is not an overly elaborate or high-quality example of its type. The intrinsic design value of the building is limited as it is considered to be a modest and functional building that broadly reflects that of the neighbouring presbytery but is less refined. The overall composition of the building is poor with a lack of detailing and awkward juxtaposition of flat roofed wings with the pitched roof and gable ends of the main hall. The north elevation of the building, with blank frontages to Stonard Road and garage and refuse storage, is considered to detract from the appearance of the existing streetscape.
- 9.25 The building includes some notable internal fixtures and fittings such as a proscenium arch, gallery seating and gas lights installed when the building was in use as a theatre. These have survived since the building reverted back to its main original use as a parish community centre and are rudimentary features of some architectural value that reflect the historic use of the building as a theatre.
- 9.26 Nonetheless the total and irrevocable loss of the existing locally listed building would result in harm, as per paragraph 9.18 of this report. That harm is considered to particularly relate to the loss of notable internal features of the building that reflect the historic use of the building as a theatre, the communal value associated with the historic theatre use and the original and existing use of the building as a parish community centre.
- 9.27 Saint Monica's Hall was constructed for, and has always been in the ownership of, the church and the use of the building as a parish community centre is a key and ongoing facet of its local interest and communal value.

- 9.28 Draft Policy HE3 (Locally listed and undesignated heritage assets and cultural practices) highlights that where the significance of a local heritage asset is linked to its use or original purpose, development proposals should take this into consideration.
- 9.29 The proposed development would re-provide the original and existing use of Saint Monica's Hall in a modern new parish community centre with better accessibility for parishioners, sufficient space for religious instruction and flexible modern floorspace that can be used by other community groups and for cultural activities, including a demountable staged theatre performance with a 156 seated audience. In addition, the proposals would provide new homes in the borough and optimise the development potential of this accessible brownfield site.

*Loss of Theatre*

- 9.30 Paragraph 93(c) of the NPPF (2021) sets out that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.
- 9.31 Policy HC5 of the London Plan (2021) relates to supporting London's culture and creative industries. The policy states that development plans and proposals should protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity. To support this, boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets and community spaces.
- 9.32 Policy S1 of the London Plan (2021) states where development proposals result in a loss of social infrastructure, there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.
- 9.33 Paragraph 7.5.6 of the London Plan (2021) states that the loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where possible, boroughs should protect such cultural facilities and uses, and support alternative cultural uses, particularly those with an evening or night-time use, and consider nominations to designate them as Assets of Community Value. Where a development proposal leads to the loss of a venue or facility, boroughs should consider requiring the replacement of that facility or use
- 9.34 Policy HC6 of the London Plan (2021) states that boroughs should protect and support evening and night time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.

- 9.35 In accordance with Policy CP11 of the Core Strategy, the Council will work with its partners to promote community cohesion. Policy CP11 of the Core Strategy, specially related to Recreation, Leisure, Culture and Arts, states the Council will seek to protect existing assets and provision, and promote and encourage the increased use of recreation, leisure, culture and arts facilities in the Borough by, amongst other objectives resisting the loss of existing recreation, leisure, heritage, culture and arts facilities, unless it can be demonstrated that they are no longer required or will be provided elsewhere;
- 9.36 Policy DMD 17 of the Development Management Document aims to protect existing community facilities in the borough. Proposals involving the loss of community facilities will not be permitted unless:
- A suitable replacement facility is provided to cater for the local community that maintains the same level of public provision and accessibility; or
  - Evidence is submitted to demonstrate that there is no demand for the existing use or any alternative community use.
- 9.37 In assessment of the proposed parish community use building, the plan depicted indicates a flexible 240sqm open plan space with no fixed seating or stage, capable of accommodating a seated audience of 220 people. The redevelopment of the site would result in the loss of the purpose-built building comprising fixed seating and a stage capable of accommodating a seated audience of 413 people.
- 9.38 The applicant, in support of policy DMD 17, indicates there is no longer a demand for the continued operation of the theatre facility in this location, citing the poor condition, accessibility of the existing building, particularly when compared to competitive venues of a modern standard in Enfield, along with declining occupancy/performance data.
- 9.39 In respect of the existing facility, the applicant indicates several shortcomings including (summary):
- The lack of flexibility: -*
- There are no meeting rooms nor teaching rooms – only the main hall and the small hall at first floor level
  - The main hall is too large for small group meetings / teaching
  - The building is dominated by a stage redundant for most of the year and used less and less by amateur dramatics
- Condition of the building and quality of accommodation:*
- The solid walls and the roofs lose heat and insulation values are below standard and causing great loss of energy
  - The emergency lights are gas fired and a fire and H&S risk requiring management attendance when occupied
  - The “small hall” is accessed from a precarious uncovered external staircase, perilous in winter and potentially a health hazard
  - The gallery alternative means of escape is via an external staircase
  - The toilets are insufficient for the number of people who potentially use the facilities
  - The kitchen does not serve the main hall

9.40 In respect of demand, the applicant indicates a decline in theatre productions.

Year	Usage	Theatre Productions (%)	Private Hire (%)	Parish (%)
2014		32	17	51
2015		24	23	53
2016		26	20	64
2017		18	32	50
2018		22	27	51

9.41 The applicant indicates the community hall is advertised through the St Monica's Church website, however no substantive information of marketing taking place outside of this format has been presented.

9.42 Options for extension/refurbishment of the building put forward by the wider public and the Intimate Theatre Group have been accounted by the applicant and discounted in some detail within the Design and Access Statement, not only on the grounds of cost, but also because the refurbished building would still be deficient for the following reasons (Summary):

- Fail to serve parish/community needs;
- Extensions fail to account for planning policy
- Internal layout fails to account for Building Regulations
- Internal layout fails to provide sufficient toilet facilities
- Internal layout fails to account for general accessibility
- Internal layout fails to account for residential and commercial /operational space standards
- Fail to account for space hierarchy
- Kitchen poorly located and underprovided
- The retained but upgraded building fabric would fail to be as energy efficient as a new build
- The building would have significant additional costs for on-going maintenance.

9.43 The applicant indicates that the proposal to replace the existing building represents the optimum solution in terms of providing a flexible community building which is accessible, energy efficient, and cost effective.

9.44 The Theatres Trust advise that theatres have evolved over time, with different internal layouts according to the types of productions presented there. Whilst many types of stage arrangements are purposed for large scale performances such as Proscenium stages, Thrust stages, Theatres in-the-round, Arena theatres, there are flexible performance spaces which when stripped to their basics involve a single room, with the floor of the stage at the same level as the first audience row. Usually these spaces allow for the temporary setup of seating in several different configurations to enable a wide variety of productions to be presented. Platform stages for example, consist of a raised rectangular platform at one end of a room. They can either have a level or raked sloping floor. The audience sit in rows facing the stage. Platform stages are often used in multi-purpose halls where theatre is only one of the space's uses. Where the stage is open and without curtains, they are sometimes known as end stages or open stages.

- 9.45 Recognising the advice of the Theatres Trust, the proposed parish community use building could be capable of performances in its presented format, indeed many of the associated facilities, including a foyer, café / bar, kitchen, multiple bathroom facilities and upper floor rooms would be beneficial. It must be stated for clarity however, that no purpose-built stage nor seating is proposed as part of the community use building. Therefore, whilst the proposal would result in the loss of a community centre containing a purpose-built theatre, this must be weighed against several key considerations including:
- the existing internal stage and seating arrangement could be removed without the need for planning consent
  - the use as a performance space would be continued as part of the proposed application, albeit as an evolved mixed use / theatre space.
- 9.46 In this context, the proposal would offer a more flexible and accessible space for the community that would continue to afford a space for performances of significant benefit, indeed the applicant has provided information demonstrating the building is capable of a demountable staged performance for a 156 seated audience, a consideration that would outweigh the loss of the existing performance arrangement and resulting reduction in capacity.
- 9.47 Taking specific account of DMD Policy 17, within Enfield, spaces that are capable of performance include:
- Millfield Theatre (capacity 362/ PTAL 3) in Edmonton
  - Aylward Theatre (capacity 300/ PTAL 3) in Edmonton
  - The Dugdale (capacity 139/ PTAL 5) in Enfield Town
  - The Chickenshed Theatre (capacity 292 / PTAL 2) in Cockfosters
- 9.48 The Theatres Trust has provided a suitability assessment of replacement facilities not only within Enfield, but within the north London area (6.7-mile radius from the site). The Theatres Trust states there to be few venues of comparable size and capacity to the Intimate, and where they exist most have constraints which make them unsuitable or unavailable for the Intimate's users. This is especially so for shows requiring use of the venue for a prolonged period.
- 9.49 It is noted that all the listed venues within Enfield currently have capacity for hire, are equal or of higher PTAL rating (transport accessibility), all have a relative, if not smaller capacity and all are within the same catchment, albeit except The Chickenshed Theatre which specialises in children and young people, it does adult shows and hires at periods however.

- 9.50 The Theatres Trust has also provided information in respect of the operation / need of the existing building for 'theatre use'. Officers have accounted for the context of the theatre being used as part of a wider community hall for parish use, in addition to the wider implications COVID has had on this industry, albeit figures only up to 2018 are provided here. Nevertheless, the information provided demonstrates the following:

<b>Usage in days for performances and other events/shows</b>
2014 – 65
2015 – 59
2016 – 52
2017 – 53
2018 – 50
<b>Usage in days for rehearsals</b>
2014 – 0
2015 – 0
2016 – 0
2017 – 29
2018 – 23
<b>Total usage in days for performances and rehearsals combined:</b>
2014 – 65
2015 – 59
2016 – 52
2017 – 82
2018 – 73

- 9.51 The Theatres Trust furthers this data noting that this is comparable with several regional venues. Whilst it is recognised that the existing building continues to serve a regular 'theatre use' and that relative demand continues, this would not outweigh a proposal that would not result in the loss of the facility, but furthers the value of a redeveloped space capable of the hosting the existing / continued uses.
- 9.52 It should be noted that where supporting paragraph 3.1.9 (of DMD 17) states:
- The loss of facilities will be allowed only in exceptional circumstances. Evidence will be required of marketing and consultation with the community to demonstrate that there is no demand for existing or alternative community uses.*
- 9.53 This has been considered alongside the wording of policy DMD 17, whereby dispensation of part a) OR part b) rather than part a) AND part b) is required. Therefore, part a) applicable schemes need not also apply the requirements of part b), namely marketing and consultation with the community to demonstrate that there is no demand for existing or alternative community uses.
- 9.54 Since the application was taken to Planning Committee in 2020 the Council has produced a Cultural Strategy for Enfield (2020 – 2025). It recognises that more can be done to develop and expand Enfield's cultural provision, especially within town centres. Culture can play a greater role in borough health and wellbeing, in economic development, to shape local pride and identity and to better reflect the diverse communities who live, work and play

in Enfield. Engagement in culture across the borough is relatively low and there are gaps in provision such as for visual arts and crafts, music at all scales, creative workspace including artist and maker studios.

- 9.55 The strategy sets out that cultural centres and theatres within the borough include the Dugdale centre, Millfield theatre and Chickenshed theatre. The strategy states that Enfield has successfully secured Department for Digital, Culture, Media and Sport (DCMS) funds totalling £672,295 to sustain amongst others Millfield Theatre and The Dugdale and enable the continued delivery of creative programmes including outreach activity, through Covid19. In addition, £200k National Heritage Lottery Funds have been secured to initiate cultural heritage activity and increase heritage capacity.
- 9.56 The Council's Cultural Strategy (2020-2025) recognises that Enfield's cultural venues including Millfield Theatre, The Dugdale and Forty Hall have active creative programmes and are much loved. The diversification of business income streams can be explored to improve long term sustainability, broaden audiences and bring more people together to enjoy what is on offer. As new development comes forward in Enfield, investment can be secured to expand and diversify the borough's cultural provision as part of social, cultural, community and employment infrastructure. This could include subsidised spaces for cultural occupiers, affordable creative workspace and artist studios, public art commissioning and cultural festival activity which enhances the life of Enfield. The proposed development could contribute to this approach to culture across the borough.
- 9.57 The Intimate Theatre has not been identified within the adopted Cultural Strategy as a cultural centre. It has been confirmed by the Property and Economy team that there are no plans to close either the Millfield or Dugdale theatres and the Council intend to invest in them in different ways to develop their programmes. It should be noted that the Chickenshed theatre is an independent theatre company that pioneers inclusive theatre, and many dance schools, choirs and orchestras.
- 9.58 Within this policy and officer assessment context, it is recognised that several suitable replacement facilities are provided to cater for the local community that maintains the same level of public provision and accessibility as per the requirement of DMD Policy 17 (a), contrary to the positions offered by the Theatres Trust and Culture at Risk Office stating that the built form value and history is key to the significance of the existing building and the availability / suitability of alternatives facilities falls short. Whilst some programming impacts presented by The Theatres Trust are acknowledged, the loss of the purpose-built existing building (and associated internal arrangement that could be removed without the need for planning consent), replaced by a flexible open plan space (capable of performance use) would continue to meet local community needs, facilitate social interaction, and promote inclusive communities, thereby meeting the policy objectives of the Local Plan as a whole.

- 9.59 There is a clear need to improve the cultural offer across the borough, there is not however, a specific policy led-cultural need for theatre. The proposals will retain community use of the site by providing a new building including a range of flexible spaces and enhanced facilities and access. Furthermore, the proposed church hall would provide flexible new spaces in which to cater for identified cultural need and could accommodate a variety of uses such as dance studios, craft groups and exhibition space in line with the Council's Cultural Strategy.
- 9.60 The proposal would comply with Paragraph 93 of the NPPF as it would enhance the sustainability of the community, take into account the local strategy for cultural well-being and re-provide for facilities to meet the identified community needs. The proposal would also comply with the objectives of Policy DMD17 and Policies HC5 and HC6 of the London Plan as it would provide a suitable replacement facility to cater for the local community and would enhance public cultural provision and accessibility.
- 9.61 The proposal would comply with the aims of the Council's Cultural Strategy, which does not raise any concerns with the level of theatre provision within the borough. Theatre use, particularly staged performances before a 156 seated audience within the new building would still be feasible, as would other cultural events.

*Asset of Community Value (ACV)*

- 9.62 Across the Borough there are buildings, land and amenities that communities may consider are an essential part of their community lifestyle. These facilities can be a shop, a pub a community centre or a library for instance and do not need to be in public ownership. The closure or sale of these places may be considered to create a potentially lasting detrimental effect to the local communities. Under the Localism Act 2011, eligible organisations, such as voluntary and community organisations with a local connection, can nominate an asset to be included on a list of 'assets of community value'.
- 9.63 A building or other land should be considered an asset of community value if:
- a) Its actual current use furthers the social wellbeing and interests of the local community, or a use in the recent past has done so; and
  - b) That use is not an ancillary one (that is it must be the primary use); and
  - c) For land in current community use it is realistic to think that there will continue to be a use which furthers social wellbeing and interests, or for land in community use in the recent past it is realistic to think that there will be community use within the next 5 years (in either case, whether or not that use is exactly the same as the present or past); and
  - d) It does not fall within one of the exemptions e.g. residential premises and land held with them.
- 9.64 The Department for Levelling Up, Housing and Communities (DLUHC) Guidance (Community Right to Bid: Non-statutory advice note for local authorities – Published by the Department for Communities and Local Government 2012), states such provisions do not restrict in any way who the owner of a listed asset can sell their property to, or at what price. They also do not confer a right of first refusal to community interest groups. The provisions do not place any restriction on what an owner can do with their property, once listed, so long as it remains in their ownership. This is because it is planning



policy that determines permitted uses for particular sites. However the fact that the site is listed may affect planning decisions - it is open to the Local Planning Authority to decide whether listing as an asset of community value is a material consideration if an application for change of use is submitted, considering all the circumstances of the case.

9.65 Saint Monica's Hall (Intimate Theatre) was designated as an Asset of Community Value in 2018 (Ref No ACV/SPS/0019), following nomination by the 'Save the Intimate Theatre Group' on the basis of its Borough wide renown (i.e. as a theatre), its integral role in the community and its role as a focal point for local engagement around arts and culture. It is also a locally listed heritage asset.

9.66 A supporting paragraph (7.5.6) to Policy HC5 of the London Plan (2021) states:

The loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where possible, boroughs should protect such cultural facilities and uses, and support alternative cultural uses, particularly those with an evening or night-time use, and consider nominations to designate them as Assets of Community Value. Where a development proposal leads to the loss of a venue or facility, boroughs should consider requiring the replacement of that facility or use.

9.67 On balance and considering the proposal as a whole in accordance with National, Regional and Local planning policy, it is considered the loss of the ACV would be offset by the public benefits associated with the provision of a modern community facility available to the local community. In addition, details demonstrating the availability of the hall to the wider community shall be secured by way of a condition.

### **Housing Need and Delivery**

9.68 The NPPF (Para. 125) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances...c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, 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 (as long as the resulting scheme would provide acceptable living standards). The current London Plan sets a target for the provision of 66,000 new homes across London each year. This target is set to increase in the London Plan with Policy H1 stating an overall target for the provision of 52,287 new homes each year. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.

9.69 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.

- 9.70 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.
- 9.71 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.
- 9.72 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.
- 9.73 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the London Plan seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 9.74 Enfield is a celebrated green borough, with close to 40% of our borough currently designated Green Belt or Metropolitan Open Land, and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. The reality of these land designations means the call on optimisation of our brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to transform.
- 9.75 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.

### **Housing Mix**

- 9.76 Policies CP5 of the Core Strategy and DMD3 of the Development Management Document refer to housing mix however, the Council's Strategic Housing Market Assessment (SHMA) which post-dates these policies illustrates an annualised requirement, between 2016-2041, for new homes to be 55% 1-bedroom, 16% 2-bedroom and 14% 3-bedroom. Officers have also considered the existing high proportion of existing 3+bed family houses in Winchmore Hill ward and GLA Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children.

- 9.77 At a regional level, Policy H10 of the London Plan states that schemes should generally consist of a range of unit sizes, having regard to various factors including local demand, the need to deliver a range of unit types at different price points across London, the mix of uses and the range of tenures, the nature and location of the site and the aim to optimise housing potential at the site.
- 9.78 The proposed residential mix would comprise 6 x 2 bedroom/3 person units. It is recognised that a mix of family units (3 and 4-bedroom+ units) within this development would not be offered, however given the floorplate of the residential portion of the building and the shortfall in private amenity space, the current offer of units represents a suitable offer in this instance.
- 9.79 In light of the above, the proposed housing mix is considered appropriate, having regard to policies CP5 of the Core Strategy, DMD3 of the Development Management Document and Policies H6 & H10 of the London Plan and the information contained within the Councils Strategic Housing Market Assessment.

#### **Residential Quality and Amenity**

- 9.80 Policy D6 of the London Plan (2021) outlines the importance of delivering high standards of internal accommodation that meet the needs of occupants and that these must be of the highest standard both internally and externally. The Core Strategy states within policy CP4 states that *'High quality design and sustainability will be required for all new homes. New housing developments should take account of the design and construction policies and sustainable design and construction guidance set out in the London Plan'*. The supporting London Plan Housing SPG provides detailed guidance on furniture arrangements, internal daylight/sunlight and circulation, amongst other considerations.
- 9.81 Each of the units would accord with the minimum floorspace standards for 2 bedroom/3 person units. Each unit would offer good functional, internal layout and can accommodate practical furniture layouts in accordance with the standards set out in the London Plan Housing SPG. All dwellings would enjoy dual aspect accommodation.
- 9.82 The level of amenity of the neighbouring properties is afforded greater weight in this instance, therefore, the scope or opportunity to provide external amenity space by way of an accessible roof for recreation or hanging balconies is significantly constrained. Therefore, the proposal would not provide the minimum of 5sqm of private outdoor space as per Policy DMD 9. Scope for communal space at ground floor level is again constrained, however given the above and the sites proximity to open spaces, the shortfall is acceptable.
- 9.83 The London Plan and Enfield Local Plan require all future development to meet the highest standards of accessibility and inclusion. A condition would be attached to any permission to ensure the scheme complies with the optional national technical standard M4(2).

**Design (impact upon adjacent NDHA)***Replacement building*

- 9.84 London Plan Policy D1 has regard to local character and states in its overall strategic aim that ‘development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings’.
- 9.85 Policy D8 of the London Plan outlines a similar aim and seeks for proposals in public places to be ‘Secure...easy to understand and maintain, relate to local context, and incorporate the highest quality design’.
- 9.86 In terms of design, Core Strategy Policy 30 requires all developments to be high quality and design led, having special regard to their context.
- 9.87 Meanwhile Policy DMD 37 seeks to achieve high quality design and requires development to be suitable designed for its intended function that is appropriate to its context and surroundings. The policy also notes that development should capitalise on opportunities to improve an area and sets out urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability, and diversity.
- 9.88 The scheme proposes a Hall building facing Green Lanes and flatted development facing Stonard Road. The hall building follows the siting of the existing Saint Monica’s Hall with a setback to all for car parking. The current stepped access is replaced by level access allowing free flow to the building by all members of the community.
- 9.89 The replacement building is of a contemporary nature, with a flat roof, curved walls and flat facades. Light brickwork in place of the traditional red brick building, stone mullioned windows, with stone corner details and horizontal banding under a part flat, part pitched roof is chosen to harmonise with the horizontal bands of church stone rather than duplicate the red brickwork of the presbytery.
- 9.90 Adjacent buildings in Stonard Road are two storeys, purpose built, Edwardian maisonettes in the form of a long terrace. The scale of the proposed building is considerably reduced when compared with the existing Hall, in keeping with the context of Stonard Road; the building sits on the same line as the adjacent terrace, whilst slightly deeper into the site than the Church allowing the eye to follow the straight line of the Stonard Road without any jarring elements. The proposed building would continue to sit below and behind the Church from the majority of views. As result of its form and detailed design, no significantly greater massing nor height would be introduced to the development site that would harm the degree of heritage significance meriting consideration of the adjacent Church.
- 9.91 Articulation is added to the flat fronted building through the introduction of a projecting two-storey entrance portal creating a double-height atrium. Opposing brick detail rises up to the lintel of the ground floor window, and across the entrance portal. Contrasting dark bricks form a feathered frame around the upper floor windows creating interest. The introduction of a dwarf wall with piers and railings sits on the boundary between the public highway

and the amenity space/soft landscaping provides separation and an element of privacy.

- 9.92 From the Stonard Road elevation, the building wraps around the contours of the site, retaining a physical separation from the Church to the east and the boundary wall of the maisonettes at Nos.15 and 17 Stonard Road to the west.
- 9.93 The majority of the proposed building footprint is taken up by the parish community hall with its main entrance located to the south of the car park. The two-storey, flat roofed building follows the same design principle as the flatted element, however at two storeys high, this part of the building is submissive, sitting below the eaves height of the existing building and below the ridge of the Church. The unimposing entrance incorporates floor to ceiling glazed doors and windows enclosed by a further projecting portal and incorporates the same horizontal brick detail rising from the ground floor as seen in the flatted development. A stained-glass panel adds interest and guides the visitor towards the entrance, whilst further landscaping enhancements to present a clear and visionary entry point shall be secured by way of condition.
- 9.94 Were the scheme to be presented with a more meaningful differentiation in terms of elevation, each building would sit as two separate entities, however the relative and modern approach taken in this instance results in a contemporary designed build, with a form and massing delivering a high-quality building in line with DMD37 for the scheme as a whole.
- 9.95 In summary, officers consider that the proposal has demonstrated a more modern approach accounting for a greater design led form, providing a much-improved site layout and thereby relationship with its context and affording greater separating distances with its most impacted neighbours. The principle of development is therefore supported in this instance.

### **Neighbouring Amenity**

- 9.96 London Plan Policy D6 states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Meanwhile, at a local level, Policy CP30 of the Core Strategy 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. Secondly, policies DMD6 and DMD8 of the Development Management Document 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

### *Noise and Disturbance*

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

- 9.98 Additionally, at a regional level, 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 and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses’, and ‘4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...’. At a local level policy DMD68 of the Development Management Document and CP32 of the Core Strategy are also relevant.
- 9.99 The proposal would result in a purpose-built community centre with a capacity of up to 220 people, this would be a reduction in numbers given the capacity for theatre productions based on the existing arrangement is approximately 350-405. In this respect, noise would still be generated but of no greater detriment than the existing arrangement.
- 9.100 In respect of the residential accommodation on Stonard Road, whilst there would be additional noise and general movement, generated by virtue of its nature, normal day to day activities associated with an additional six households living at the premises or utilising the open space to the front of the residential block is unlikely to result in unacceptable additional levels of noise and disturbance.
- 9.101 It is recognised that that there is the potential for some level of light pollution arising from the development, however given its scale and nature, would be of no greater detriment than the existing arrangement.

*Privacy, Overlooking and Outlook*

- 9.102 Policy D6 of the London Plan states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing.
- 9.103 The Mayor of London’s Housing SPG does not support adhering rigidly to visual separation measures as they can limit the variety of urban spaces and housing types in the city. Standard 28 of the Mayor of London’s Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 9.104 To the north west of the site is the boundary of No. 15 Stonard Road, an end of terrace Edwardian house that features flank and rear bay windows to the rear on its 2 storey rear extensions. At ground floor level the boundary wall is up to 2m in height, with a mix between a solid boundary and soft planting / hedging. At this level, the introduction of single window and doorway would not result in any detrimental harm. At first and second floor levels of the flatted development, an obscure west facing window serving a kitchen is proposed, whilst the community development features a west facing clerestory window serving the main hall. The kitchen windows provide secondary light to the open plan kitchen/lounge however these shall be conditioned to be finished in obscure glass, allowing light into the space whilst protecting neighbour’s

amenity. The clerestory window to the main hall by virtue of their nature and position from floor level would prevent overlooking.

- 9.105 To the south west are the communal gardens of Hertford Court, whereby doors would be placed at ground floor level and windows would be placed at ground and first floor level. Given the planting along this part of the boundary, the nature of sensitive areas these would afford and the distance to the main block of Hertford Court, it is considered no detrimental harm would result.
- 9.106 Access to the roof is for maintenance purposes and a condition shall prevent access from residents and visitors, consequently neighbour's amenity would be preserved.

#### *Air Quality*

- 9.107 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.

#### **Transport**

- 9.108 The London Plan Policy T1 and the Mayor's Transport Strategy sets out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 9.109 London Plan Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 9.110 Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced so as to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

### *Car Parking*

- 9.111 The proposed development would provide 12 car parking spaces which equates to 1 space per flat and 1 space per 300sqm of church hall floor space. Given the site is located in PTAL 2, which represents a low PTAL and Green Lanes has parking restrictions, in addition to the existing informal parking arrangement, this is considered acceptable. A S106 legal agreement will be secured to exclude residents from obtaining parking permits from any future CPZ given the low PTAL. Furthermore, appropriate conditions will be secured to encourage the use of more sustainable transport measures in the form of cycling.

### *Cycle Parking*

- 9.112 Cycle parking is shown on the plans to be sited across the site. However, a condition will be secured to ensure that cycle parking is provided in accordance with London Plan standards. Separate long stay, fully enclosed and secure cycle parking would be required for both the residential units and the staff at the parish hall. There must be a minimum of 2 spaces per 2-bed flat in a secure and fully enclosed cycle parking shed / locker close to the residential entrance, and for the staff parking, there should be a minimum of 1 space per 8 members of staff in another locker or shed, close to the entrance to the church hall. Short stay cycle parking for the parish hall can be provided as Sheffield stands, and this must be provided at a minimum ratio of 1 space per 100sqm gross floor area.

### *Access and Servicing*

- 9.113 Policy DMD47 states that new development will only be permitted if the access and road junction which serves the development is appropriately sited and is of an appropriate scale and configuration and there is no adverse impact on highway safety and the free flow of traffic.
- 9.114 Parking spaces shall be located on Green Lanes and Stonard Road via existing accesses.
- 9.115 Although the plans currently show gated access to the Green Lanes car park, it is considered appropriate for revised details of this arrangement to come forward through a condition to ensure that there is no impact on the free flow of traffic or the safety of highway users.
- 9.116 Further details of the parking layout and pedestrian access to the site will also be required to ensure there is clear and safe access for both pedestrians, cyclists and vehicles including servicing.

### **Trees and Landscaping**

- 9.117 Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.



- 9.118 At a local level. Policy DMD80 of the Development Management Document stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect. Additionally, Policy DMD81 of the Development Management Document refers to landscaping.
- 9.119 The supporting Arboricultural Impact Assessment (AIA) and Tree Survey indicates the site contains 5 trees (T2 – Category U, T3 – Category C, T4 – Category B, T5 – Category C, T6 – Category C) and 2 groups (G1 – Category C and H1 – Category C).
- 9.120 The AIA concludes that the proposed development would require the removal of three individual trees, one group of trees (G1) and a hedgerow (H1).
- 9.121 One of the individual trees identified for removal (T2 - Hawthorn) was considered to be unsuitable for long-term retention during the Arboricultural Survey of the site. The removal of this tree would be required irrespective of the proposed development due to its poor condition.
- 9.122 A further individual tree (T4 - Turkey Oak) shown to be removed has been assessed as having a moderate retention value. This tree has more potential to make a longer-term contribution to the landscape character of the site. However, as it of a relatively immature status, it is considered that any losses to visual amenity can be sufficiently compensated for in the short-term through replacement tree planting.
- 9.123 The remaining tree (T3 - Sycamore), group (G1 - Ash) and hedgerow (H1 - Mixed Species) being removed are all specimens considered to be of a low retention value in the Arboricultural Survey. It is not considered that the removal of these trees should be considered a constraint to the proposed development of the site as they are not in such a condition that they are likely to make a lasting contribution to the landscape character of the site. It is therefore considered that subject to appropriate conditions to demonstrate how the retained trees would be successfully protected throughout the site's development, a planting plan/schedule and a landscaping specification including a scheme of aftercare and maintenance, the details are considered acceptable in relation to trees and in line with relevant policies including Enfield Policies DMD80 and DMD81 of the Development Management Document and Policy G7 of the London Plan.

## **Water Resources, Flood Risk and Drainage**

### *Flooding and Drainage*

- 9.124 London Plan policies SI12 and SI13 require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 confirms the Council's approach to flood risk, inclusive of the requirement for SuDS in all developments. Policy DMD59 confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere and that planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in unacceptable levels of flood risk on site or increase the level of flood risk to

third parties. Policy DMD 61 requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.

- 9.125 The site is located within flood zone 1, as defined by the Environment Agency, and so is at a low risk of flooding. Furthermore, the risk of surface water flooding is deemed to be very low, and so the proposed use would be appropriate in this location, subject to the recommended conditions.

#### *Sustainable Drainage*

- 9.126 Policy DMD61 of the Enfield Development Management Document requires that all major developments must maximise the use of SuDS in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management Train. The proposed development will incorporate a number of SuDS measures such as green roofs, attenuation tank, permeable paving and rain gardens. A more robust SuDS Strategy shall be secured by an appropriate condition to ensure that the proposed measures manage surface water as close to its source as possible and follows the drainage hierarchy in line with the London Plan and a further condition for a requirement of a verification report once SuDS measures have been implemented. The SuDs officer has no objections subject to appropriate conditions, having regard to policies CP28 of the Core Strategy, DMD60 and DMD61 of the Development Management Document and SI12 and SI13 of the London Plan as well as the guidance contained within the NPPF.

#### **Environmental Considerations**

##### *Energy and Sustainability*

- 9.127 The NPPF (Para 157) requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping.
- 9.128 Policy SI2 of the London Plan sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development). Meanwhile Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 9.129 An energy statement in accordance with Policies DMD49 and 51 is required to demonstrate how the development has engaged with the energy hierarchy to maximise energy efficiency. This could be secured by appropriate conditions and is thus deemed acceptable.
- 9.130 The energy technologies to be implemented within the development include photovoltaic panels, which would reduce CO2 emissions and shall be secured by condition.

*Biodiversity*

- 9.131 The NPPF (Para.174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. At a regional level, policy GG2 of the London Plan requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. This is reaffirmed in the DMD policies 78 to 81.
- 9.132 A Preliminary Ecological Impact Assessment and Bat Survey Report has been submitted and concludes that the site is of low ecological value and that the proposed development would not result in the disturbance of any existing habitats.
- 9.133 It is therefore concluded that appropriate conditions could be attached to secure biodiversity enhancements at the site, having regard to the requirements outlined in the NPPF (Para 174), policies GG2 and G6 of the London Plan and policy CP36 of the Core Strategy.

**Equalities Impact**

- 9.134 In line with the Public Sector Equality Duty the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions including decision making on planning applications. These considerations include: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9.135 The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above. In making this recommendation, due regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, marriage / civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).
- 9.136 When determining the planning application (and thereby accounting for the representations resulting from public consultation), the Council has considered the potential effects of the proposed development on those with protected characteristics as defined under the Equality Act 2010. In doing this, the Council has had due regard to equality considerations and attribute appropriate weight to such considerations. In providing the recommendation to Members that planning consent should be granted, officers have considered equalities

impacts in the balance, alongside the benefits arising from the proposed development.

- 9.137 There are no statutory or regulatory requirements for the form or content of an equalities assessment. The scale and significance of such impacts cannot always be quantified, and it is common to address this through descriptive analysis of impacts and identifying whether such impacts are adverse or beneficial. The key elements of the Proposed Development which have an impact that could result in an equalities effect include the design and physical characteristics of the proposals subject to the planning application. Officers do not consider there would be a disproportionate equalities effect.
- 9.138 In line with the Human Rights Act 1998, it is unlawful for a public authority to act in a way which is incompatible with a Convention right, as per the European Convention on Human Rights. The human rights impact has been considered, with particular reference to Article 1 of the First Protocol (Protection of property), Article 8 (Right to respect for private and family life) and Article 14 (Prohibition of discrimination) of the Convention.
- 9.139 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest. The recommendation is considered appropriate in upholding the Council's adopted and emerging policies and is not outweighed by any engaged rights.

#### **Section 106 / Legal Agreement**

- 9.140 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.

##### Transport and Highways

- Future CPZ parking permits restricted
- 5% monitoring fee

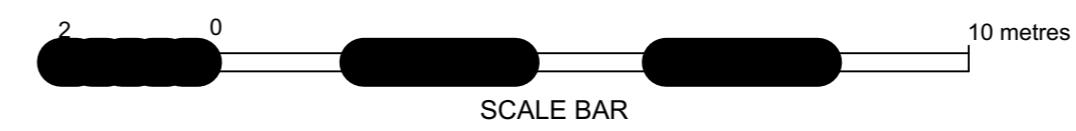
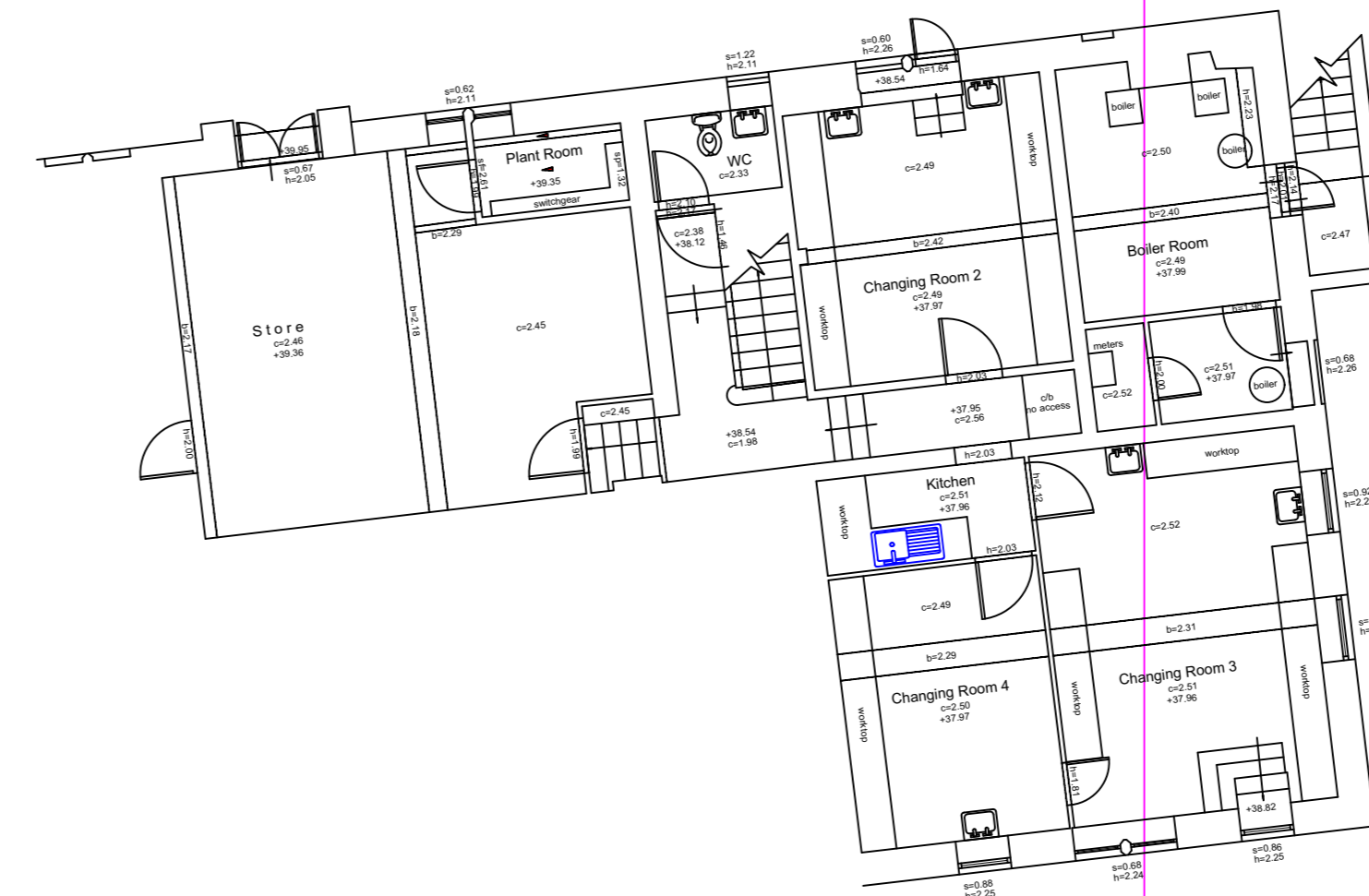
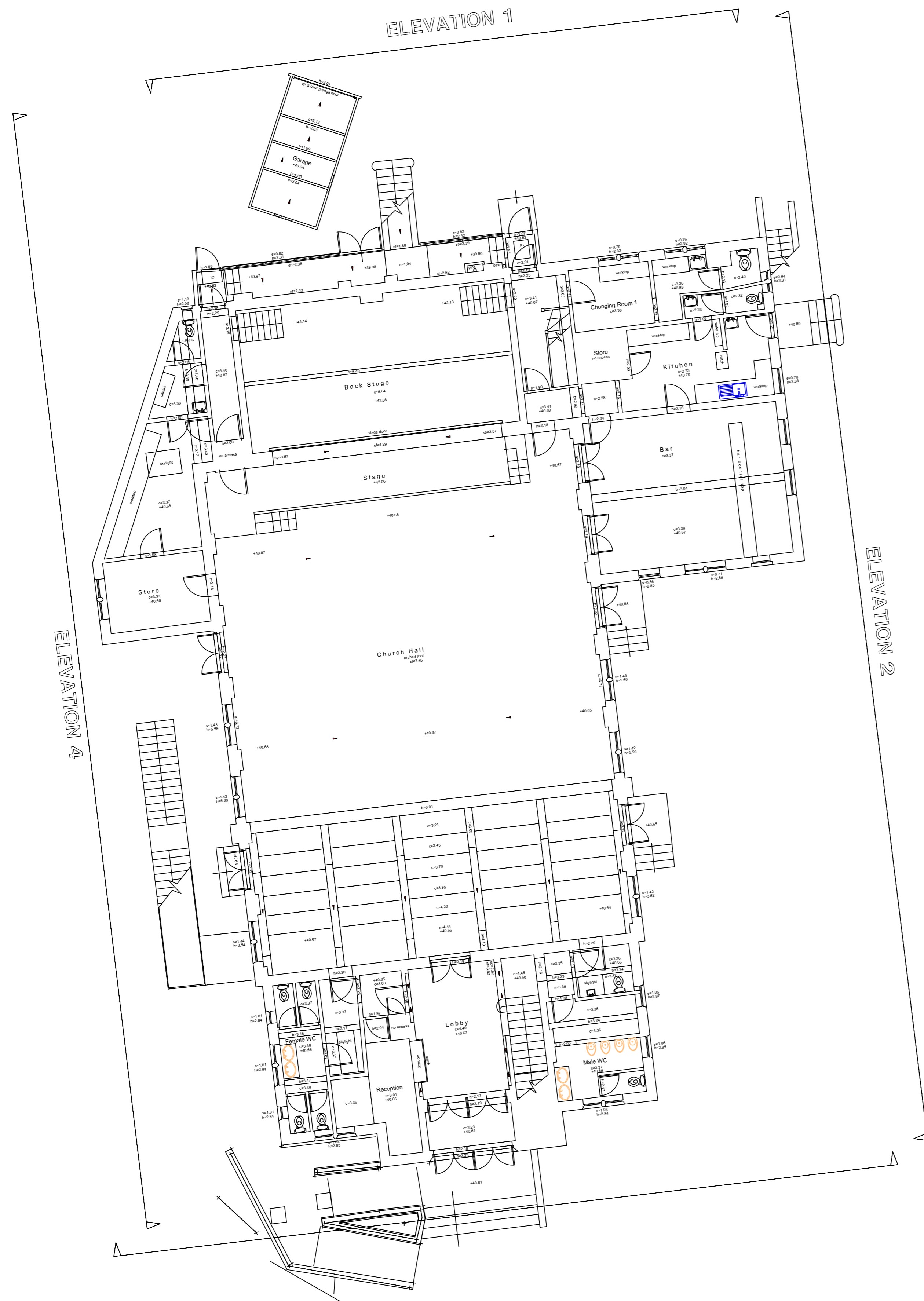
#### **Community Infrastructure Levy**

- 9.141 There will be a net increase in floor space and therefore schemes would typically be liable to the Enfield and Mayoral CIL. The applicant's supporting CIL liable planning application form however indicates a mandatory exemption for using this chargeable development wholly or mainly for charitable purposes.
- 9.142 The collecting authority shall however calculate the amount of CIL payable ("chargeable amount") in respect of a chargeable development in accordance with this regulation prior to commencement of the development.

### **10. Conclusion**

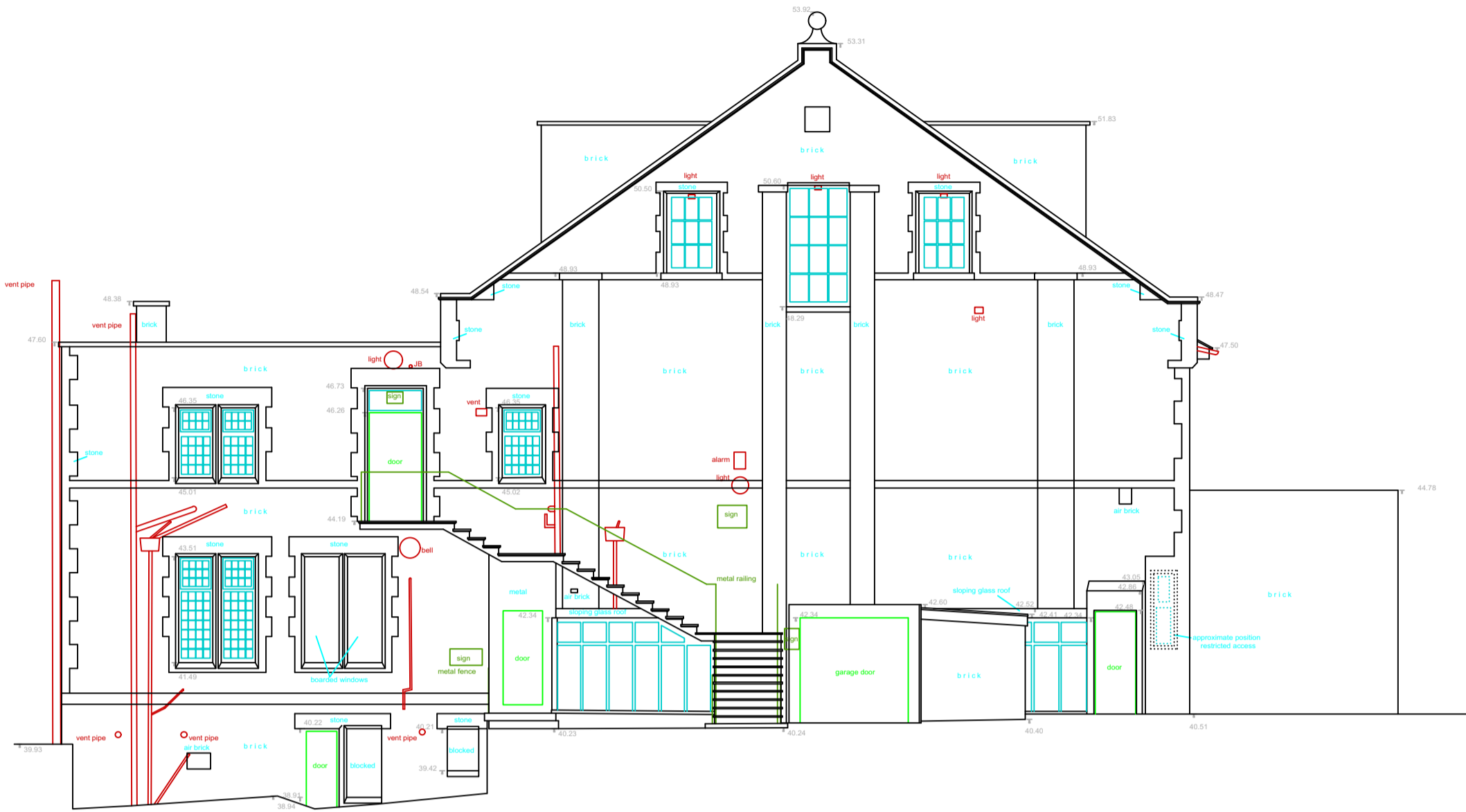
- 10.1 It is acknowledged that and as is recognised throughout this report, that consideration of this proposal has involved finely balanced judgements. Concessions have been made in the consideration of the proposal and designations of the site, in order to optimise the community led development potential of this site, in addition to contributing to the Borough's challenging housing targets.

- 10.2 The proposed development would be consistent with the objectives of the development plan policy in terms of supporting community uses, securing sustainable growth and delivery of new housing stock within the borough.
- 10.3 It is considered that where conflicts with Development Plan policies have been identified, these would not on their own or cumulatively significantly and demonstrably outweigh the benefits of the proposed development. In particular, the loss of the non designated heritage asset would be offset by the delivery of a modern facility for the local community. Opportunities to record the existing building and potentially display original features demonstrating its historic use as the Intimate Theatre would also be beneficia.
- 10.4 The proposed building would be of high quality design and make a positive contribution to the character and appearance of the area.
- 10.5 The proposal would not result in conditions prejudicial to the free flow and safety of traffic on the adjoining highway.
- 10.6 Officers acknowledge that due to site constraints, there are shortcomings to the proposal. However, it is also recognised that the purpose development would result in a well-designed modern community centre that would provide high quality modern flexible floorspace for parishioners and community groups, in addition, the delivery of new housing stock within the borough given the pressing need and extremely challenging 10-year housing delivery target weighs heavily in favour of the development.
- 10.7 Overall, it is concluded that the development for reasons set-out within this report, 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.



Project title		St Monica's Hall	
Drawing title		Existing ground and basement	
Drawing no.	14056(E)SU1.02	Rev	
Scale	1:100@A1	Date	Sep-18
Drawn by		Checked by	

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Elevation 1



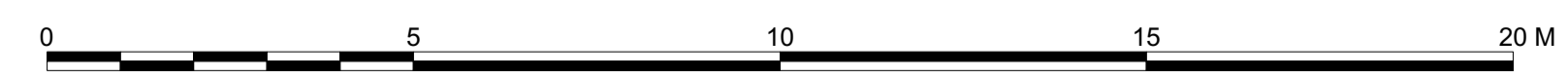
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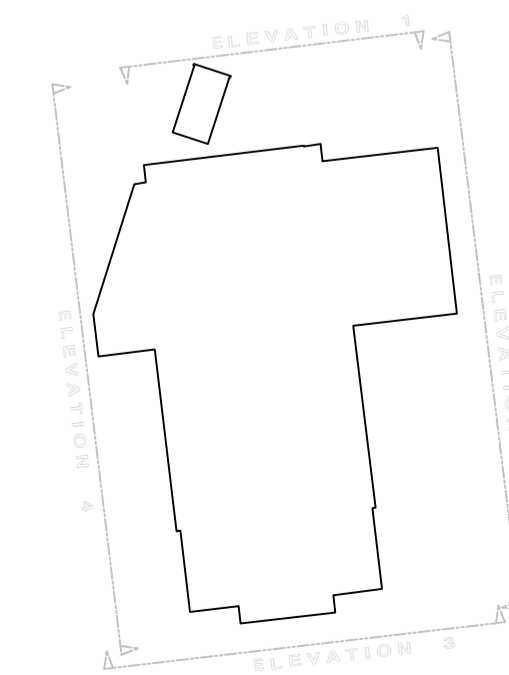
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Elevation 4

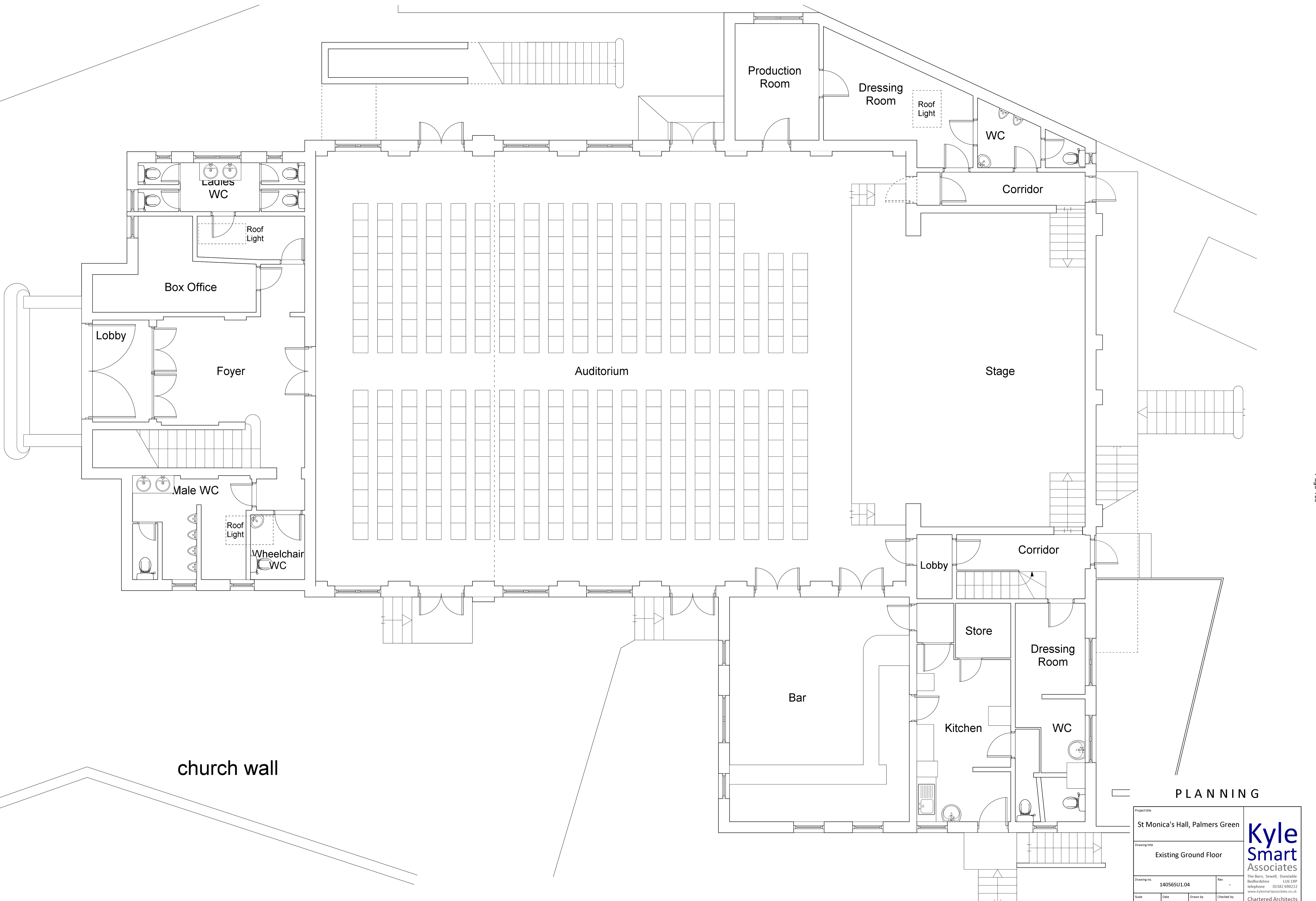


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PLANNING

Project title		St. Monica's Hall Palmers Green		<p>The Barn, Sewell, Dunstable Bedfordshire LU5 2JP telephone 01582 690222 www.kylesmartassociates.co.uk Chartered Architects</p>
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Drawn by	SG	Checked by	CS	

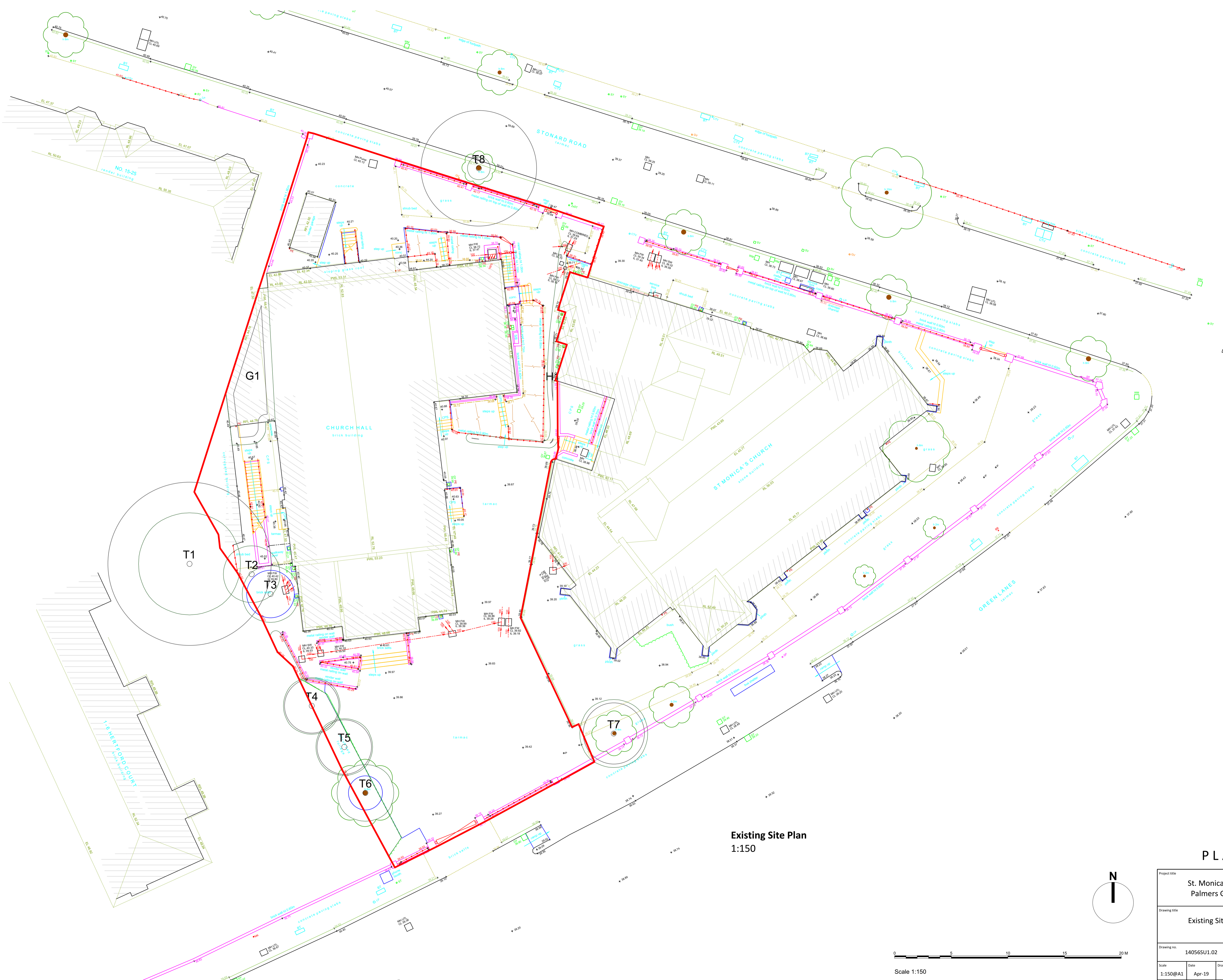


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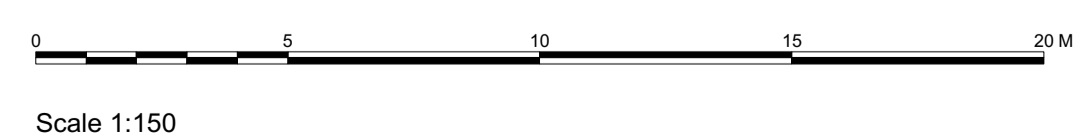
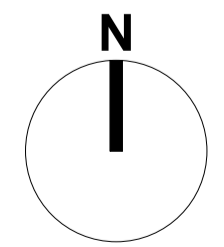
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Drawn by	SG	Checked by	CS

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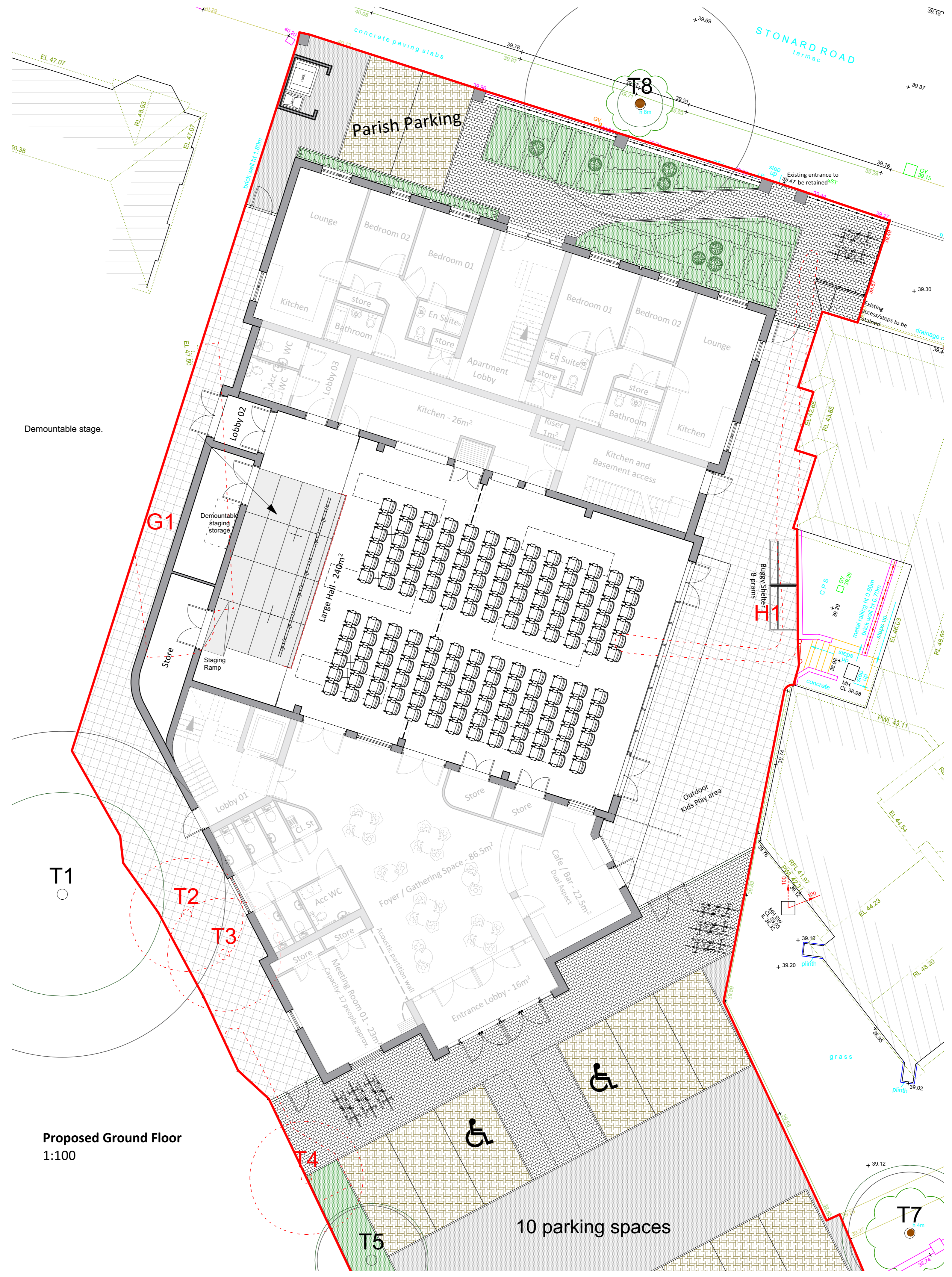


Existing Site Plan  
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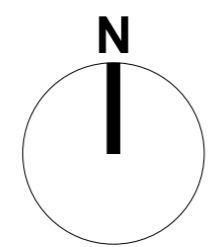
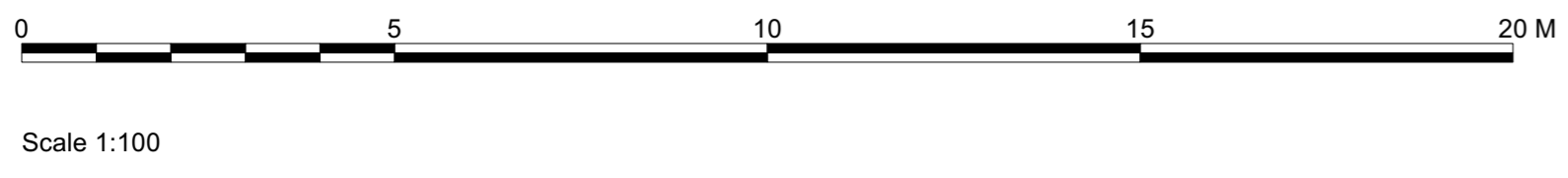


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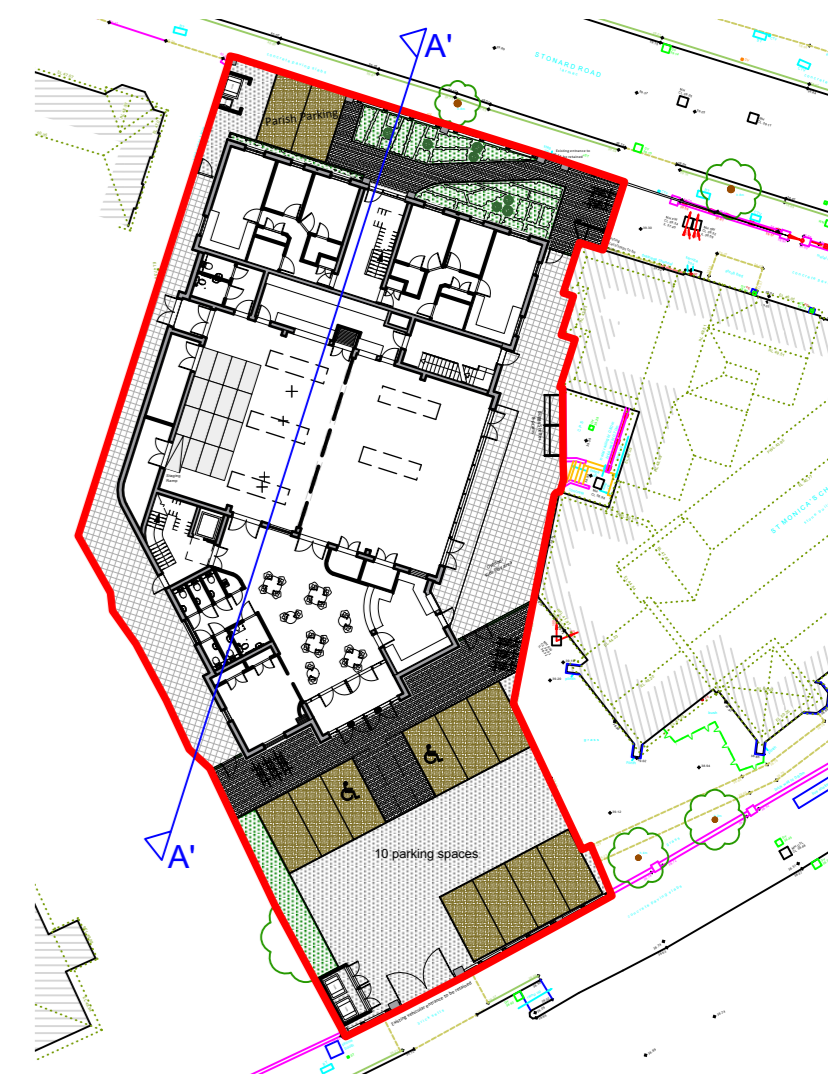


**Proposed Ground Floor**  
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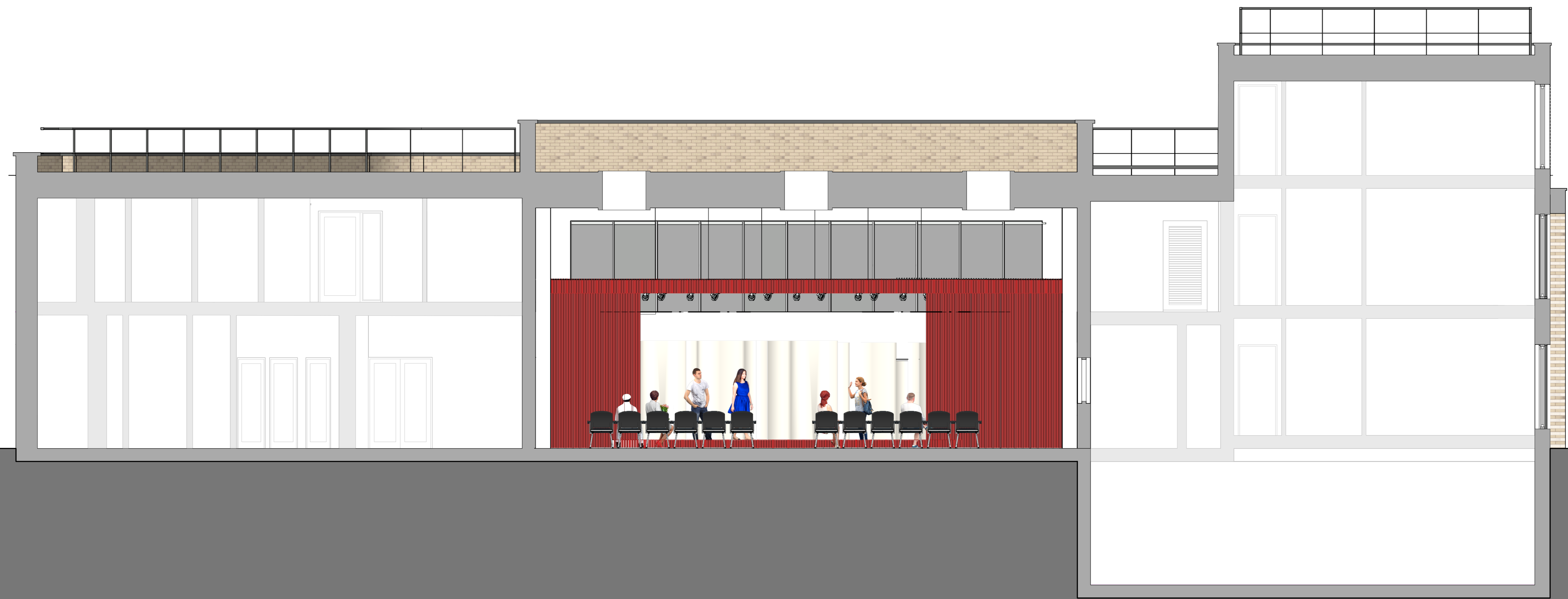


**PLANNING**

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Drawn by	MJK	Checked by	CS
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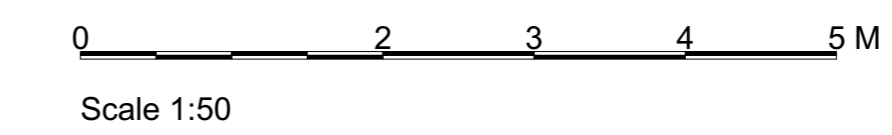


**Elevation Legend**  
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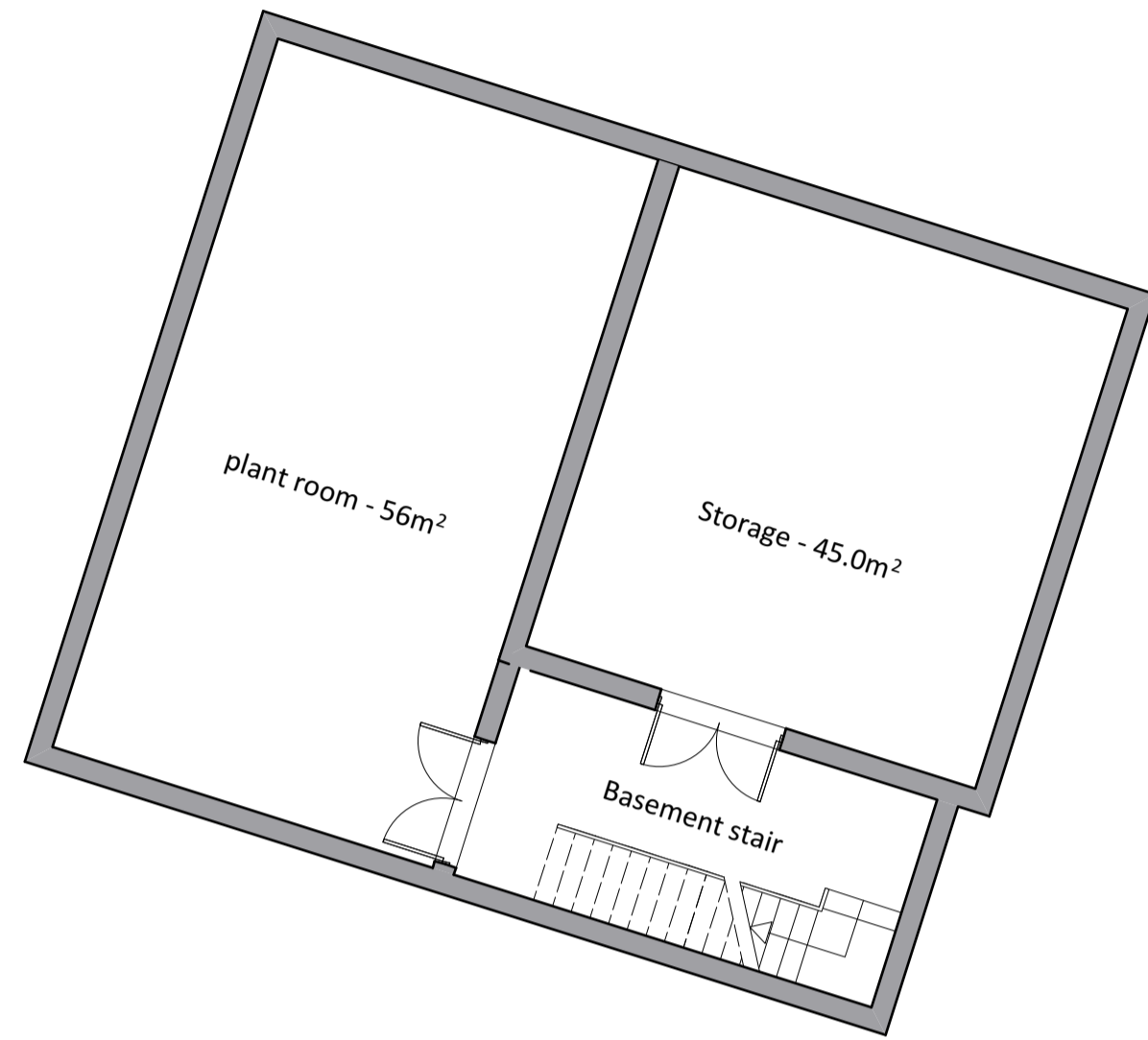
**Proposed Section AA/Staging layout**  
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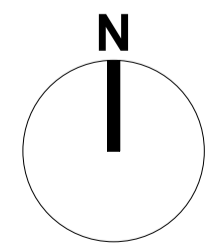
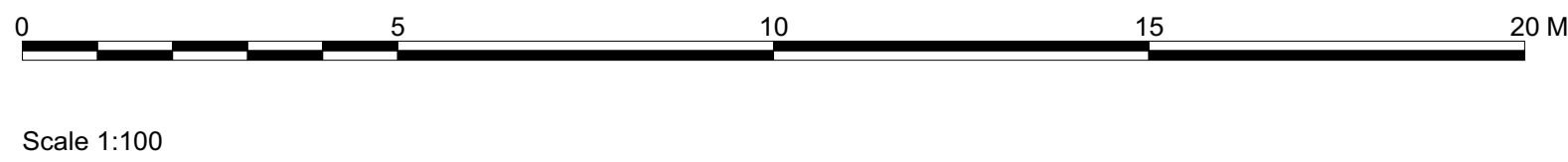
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Proposed Basement Level  
1:100



Proposed Ground Floor  
1:100



- B 06/06/2019 Ground Floor correctly labelled
- A 15/05/2019 Landscape amended and basement shown

**PLANNING**

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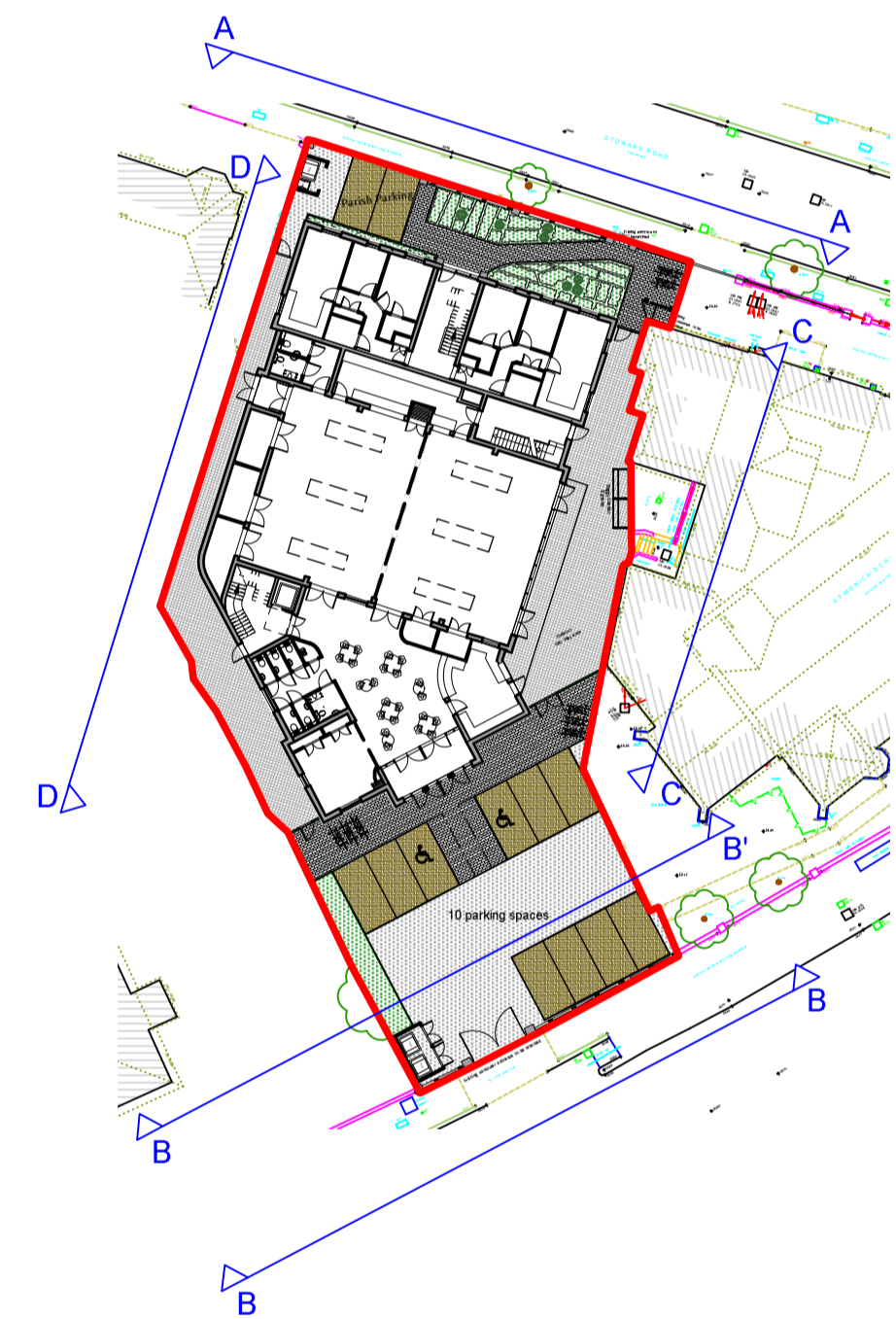
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Proposed Elevation AA - Stonard Street View  
1:100



Proposed Elevation AA - Enlarged  
1:50



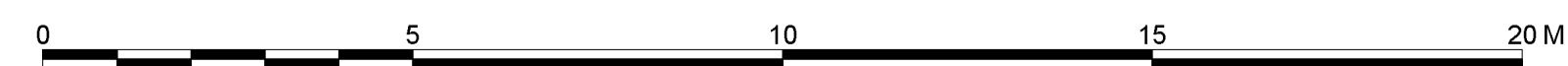
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A 15/05/2019 railings and minor additions of detail

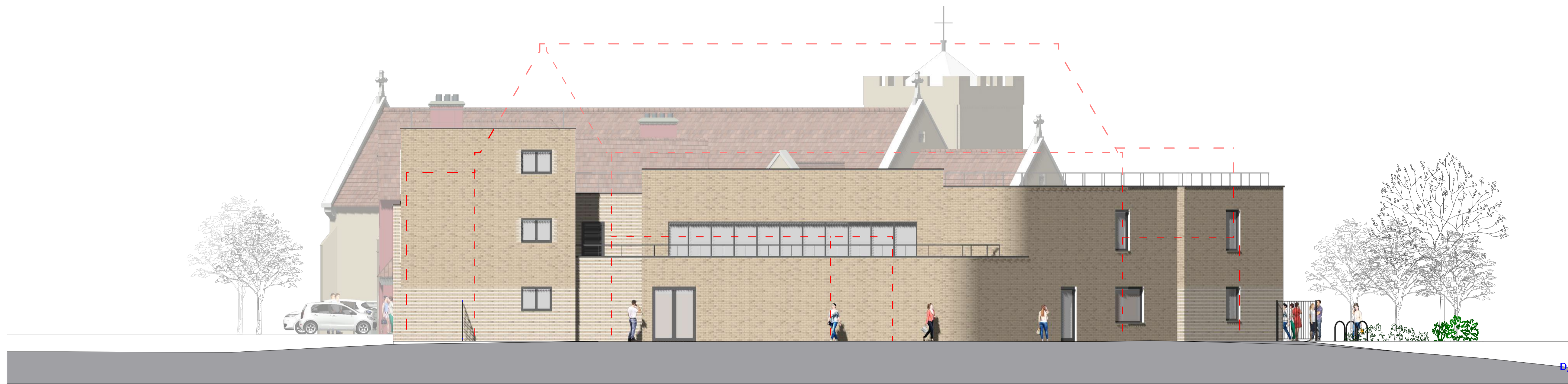
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Scale As Shown	Drawn by SG	Checked by CS

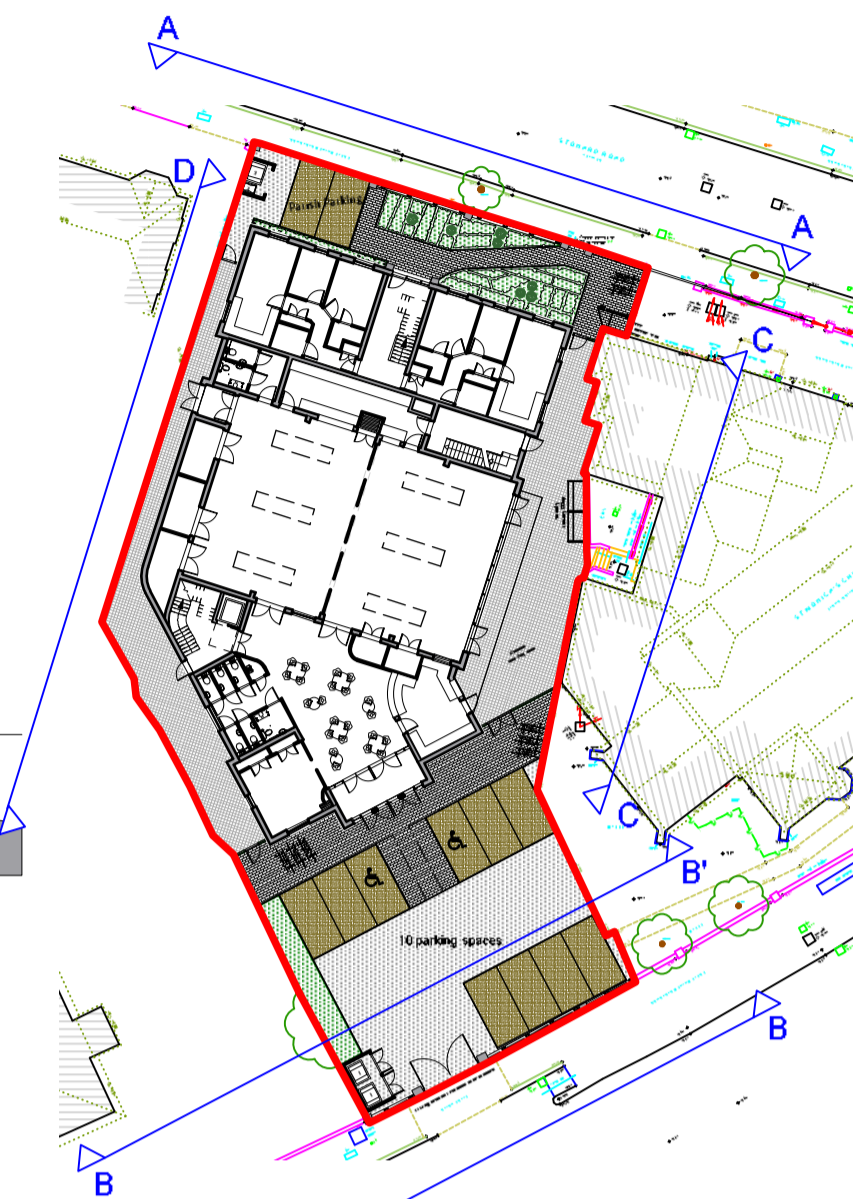
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Scale 1:100



Proposed Elevation DD  
1:100




Elevation Legend  
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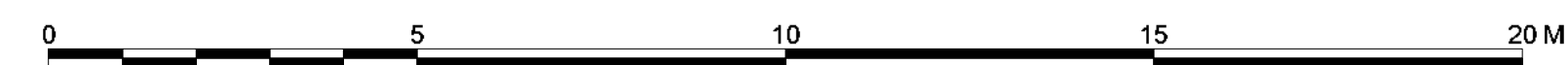


Proposed Elevation DD  
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A 15/05/2019 minor detail additions

**PLANNING**

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Drawing title		Proposed Elevations DD		
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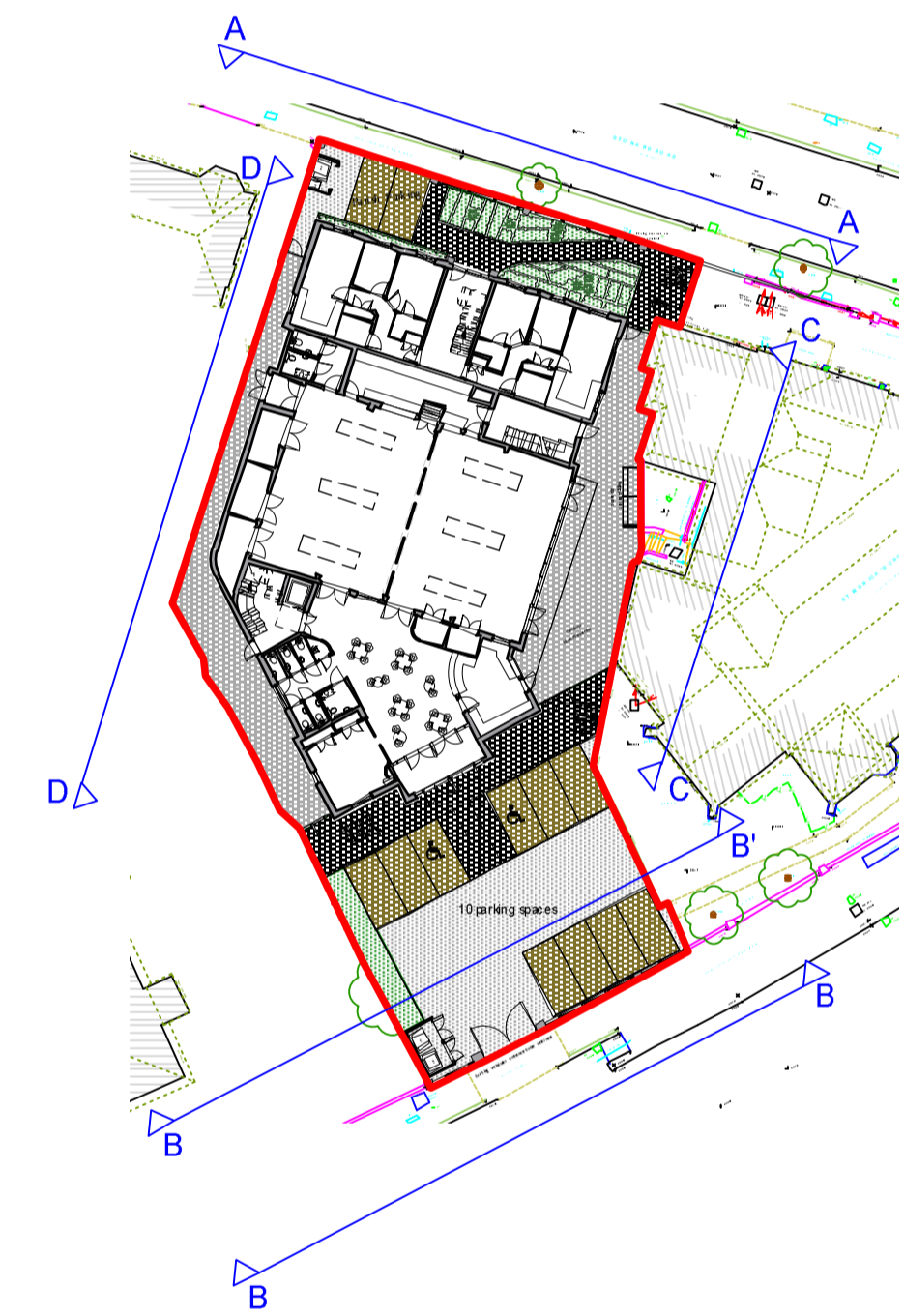
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Proposed Elevation BB - Green Lanes View  
1:100



Proposed Elevation BB' - Green Lanes View  
1:50

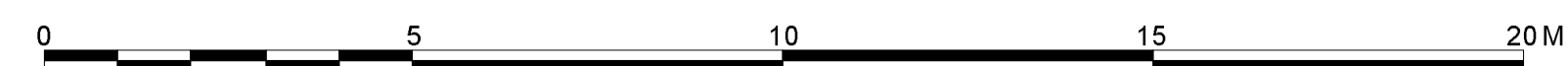


Elevation Legend  
1:500

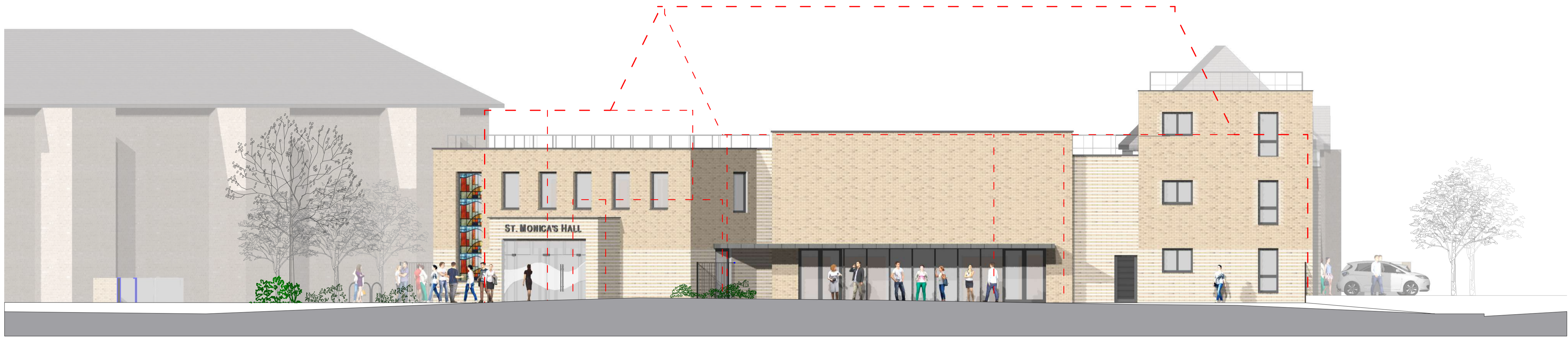
A 15/05/2019 railings added and minor changes

**PLANNING**

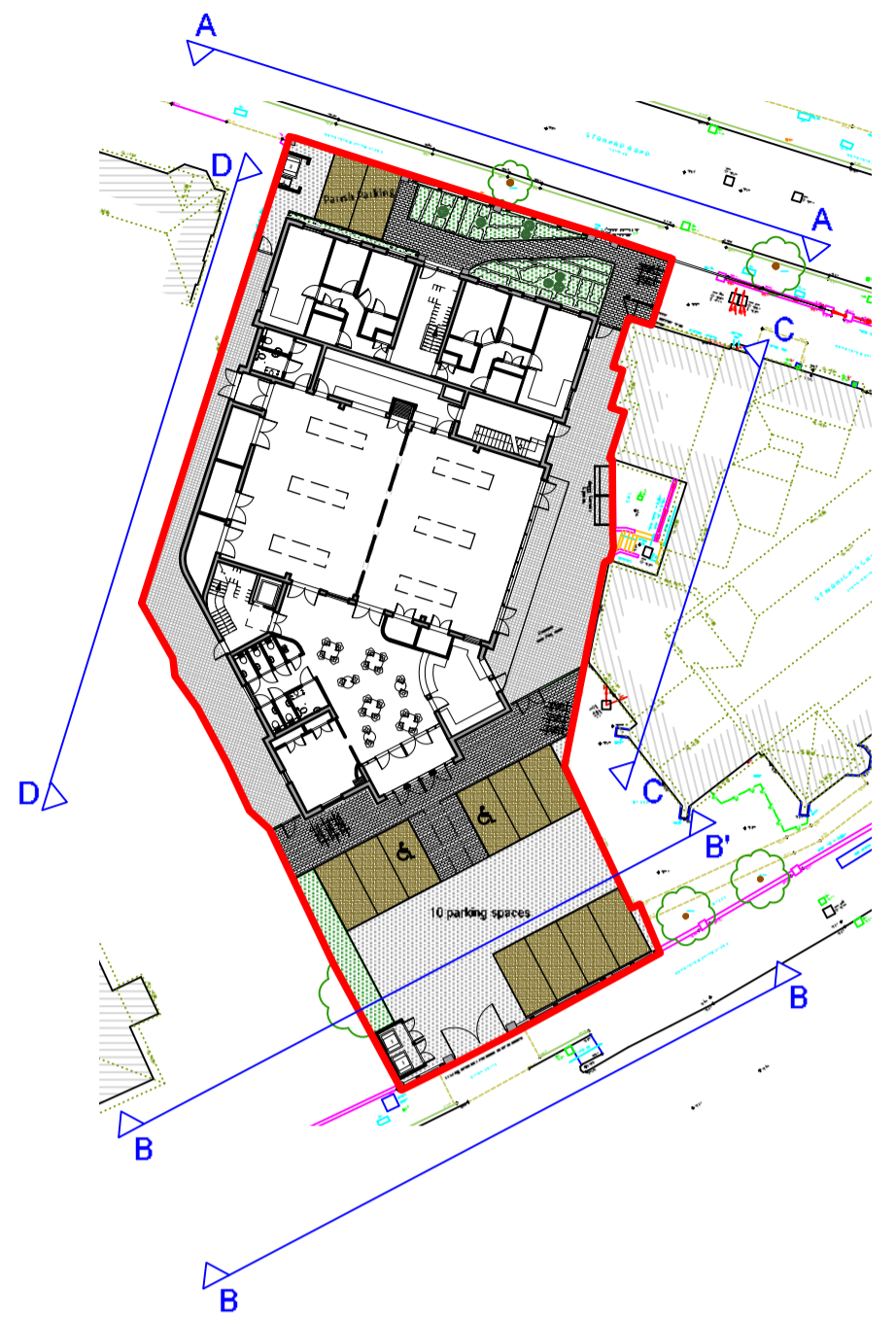
Project title		St. Monica's Hall Palmers Green		
Drawing title		Proposed Elevation BB Green Lanes		
Drawing no.	14056wd2.102	Rev	A	The Barn, Sewell, Dunstable Bedfordshire LU5 3AP Telephone 01582 690222 www.kylesmartassociates.co.uk Chartered Architects
Date	Apr-19	Drawn by	SG	
Scale	As Shown	Checked by	CS	



Scale 1:100



Proposed Elevation CC  
1:100



Elevation Legend  
1:500

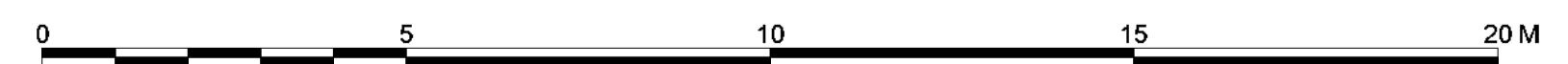


Proposed Elevation CC  
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A 15/05/2019 minor detail additions

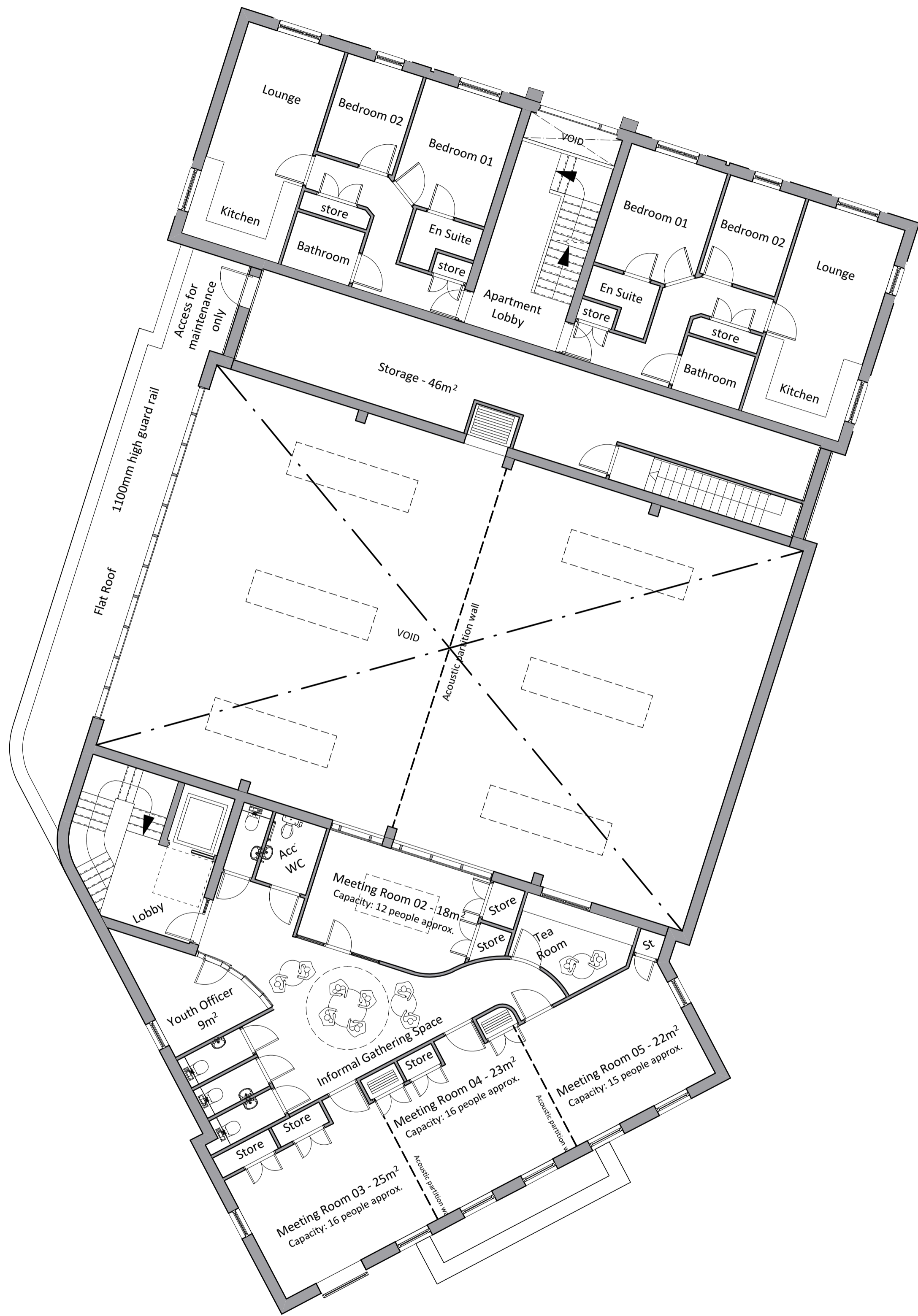
**PLANNING**

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Drawing title		Proposed Elevations CC		
Drawing no.	14056wd2.103	Rev	A	The Barn, Sewell, Dunstable Bedfordshire LU6 1JP telephone 01582 690222 www.kylesmartassociates.co.uk Chartered Architects
Scale	As Shown	Date	Apr-19	
Drawn by	SG	Checked by	CS	

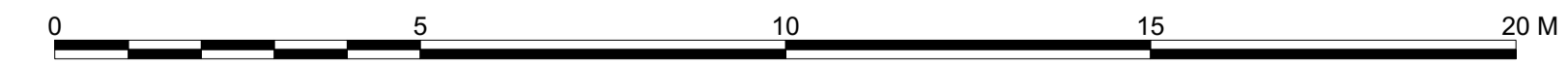
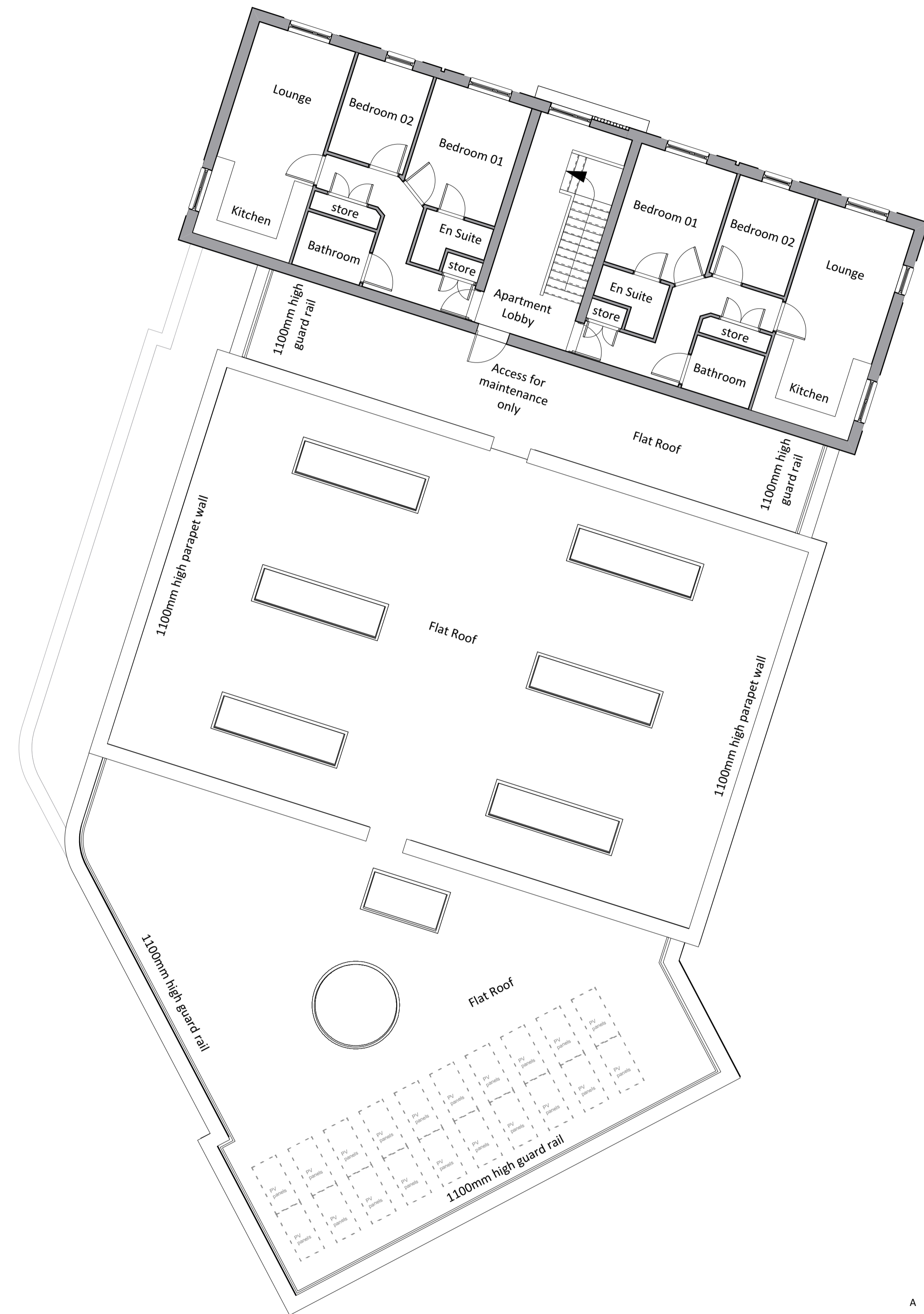


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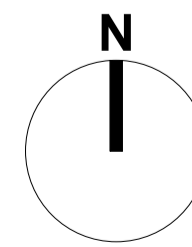




Proposed Second Floor  
1:100



Scale 1:100

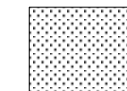
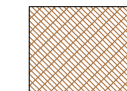
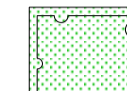



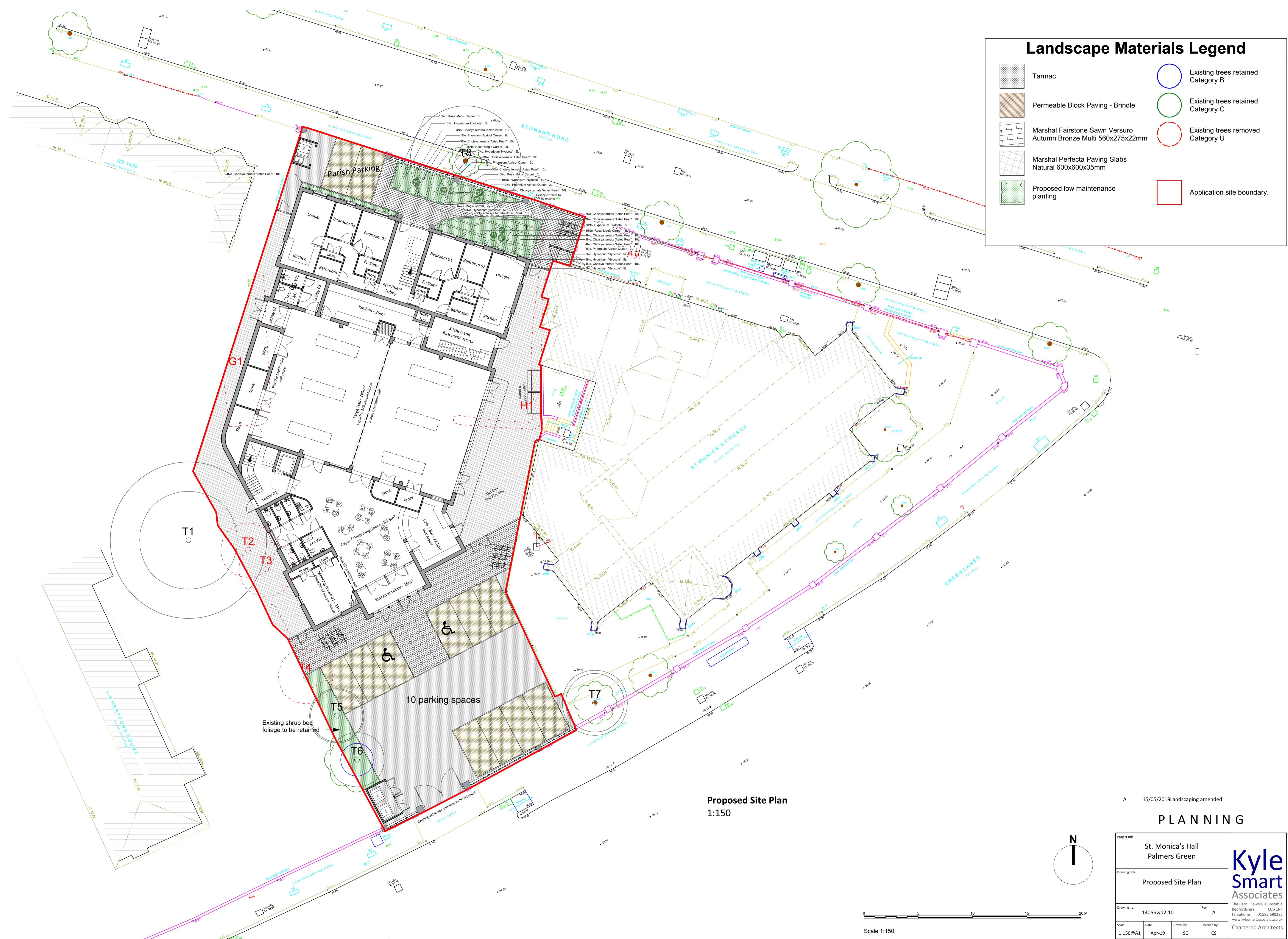
A 15/05/2019 minor internal amendments

PLANNING

Project title		St. Monica's Hall Palmers Green		
Drawing title		Proposed Plans 2 First and Second Floor		
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Scale	1:100@A1	Date	Apr-19	
Drawn by	SG	Checked by	CS	

# Landscape Materials Legend

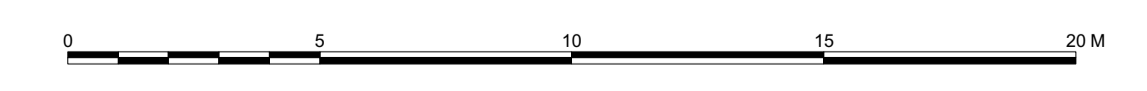
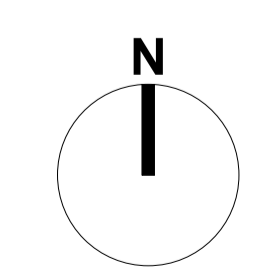
-  Tarmac
-  Permeable Block Paving - Brindle
-  Marshal Fairstone Sawn Versuro Autumn Bronze Multi 560x275x22mm
-  Marshal Perfecta Paving Slabs Natural 600x600x35mm
-  Proposed low maintenance planting
-  Existing trees retained Category B
-  Existing trees retained Category C
-  Existing trees removed Category U
-  Application site boundary.




**Proposed Site Plan**  
1:150

A 15/05/2019 Landscaping amended

## PLANNING



Scale 1:150

Project title		St. Monica's Hall Palmers Green		 The Barr, Sewell, Dunstable Bedfordshire LU5 2JP telephone 01582 690222 www.kylesmartassociates.co.uk Chartered Architects	
Drawing title		Proposed Site Plan			
Drawing no.	14056wd2.10	Rev	A		
Scale	1:150@A1	Date	Apr-19	Drawn by	SG
		Checked by	CS		

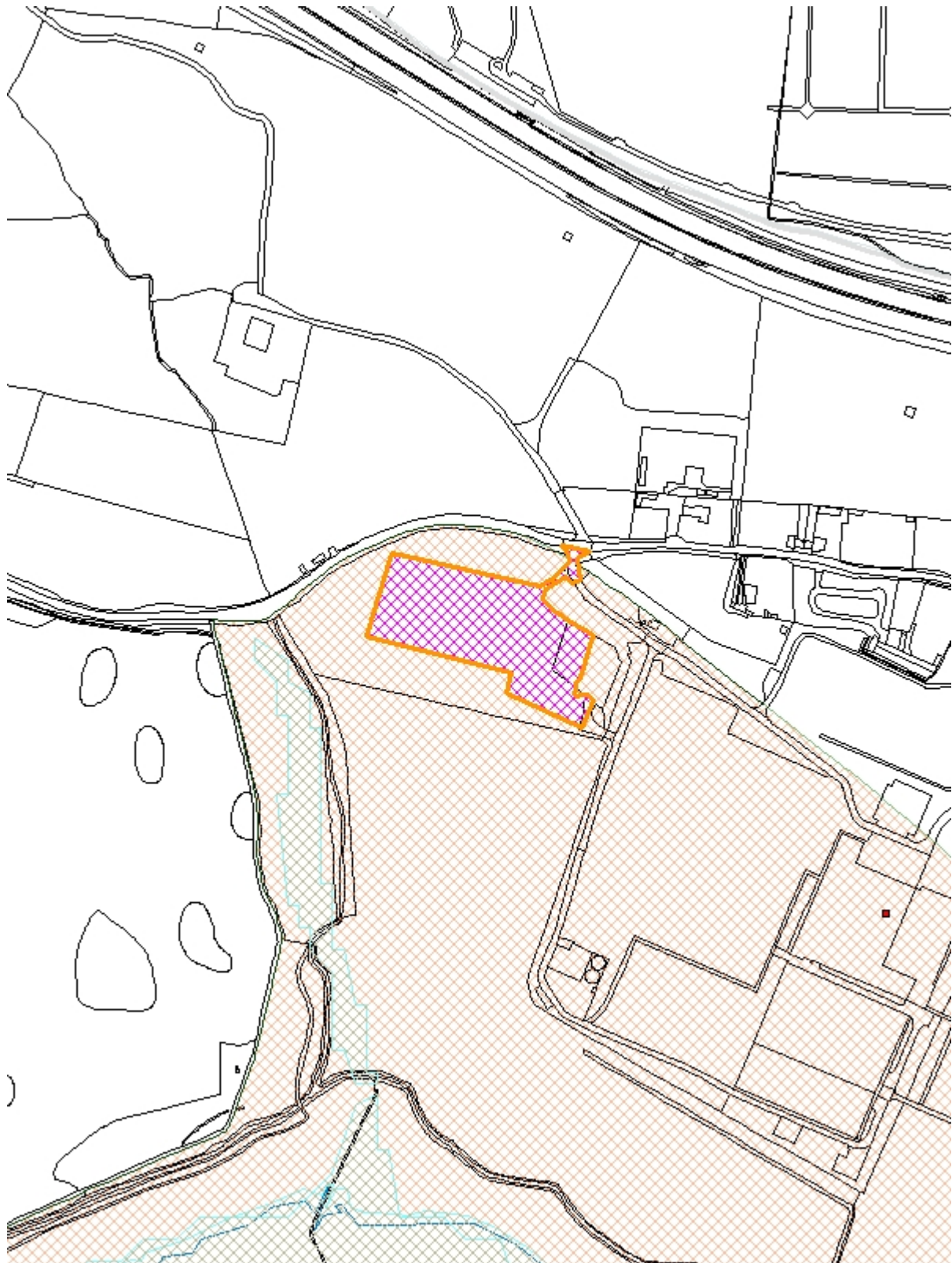
**LONDON BOROUGH OF ENFIELD****PLANNING COMMITTEE****Date:** 22<sup>nd</sup> of February 2022**Report of**Head of Planning  
- Vincent Lacovara**Contact Officer:**Andy Higham  
James Clark**Ward:**

Chase

**Ref:** 21/03694/FUL**Category:** Full Planning Application**LOCATION:** Western Fields, Tottenham Hotspur Training Centre, Hotspur Way, Enfield, EN2 9AP**PROPOSAL:** Part retrospective erection of a temporary building (Sui Generis) to provide training facilities; installation of a sports pitch; car parking; hard and soft landscaping; and associated works.(amended)**Applicant Name & Address:**Mr Richard Serra  
Tottenham Hotspur Academy  
C/o Lilywhite House  
782 High Road  
London  
N17 0BX**Agent Name & Address:**Mr James Beynon  
Quod  
Capital  
Bond Court  
Leeds  
LS1 5SP  
james.beynon@quod.com**RECOMMENDATION:**

1. That subject to the completion of a S106 to secure the matters covered in this report the Head of Development Management be authorised to GRANT planning permission subject to conditions.
2. That the Head of Development Management be granted delegated authority to agree / amend the final wording of the conditions to cover the matters in the recommendation section of this report.

Ref: 21/03694/FUL LOCATION: Tottenham Hotspur Training Centre, Hotspur Way, Enfield, EN2 9AP



## **1 Recommendation:**

1.1 That subject to the completion of a S106 agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions:

1. Temporary Time limit
2. Accordance with plans
3. External Appearance
4. Lighting Plan
5. Drainage Strategy
6. Low carbon technology
7. Energy certificate
8. Cycling storage
9. Electric charging points
10. Car Parking
11. Use of Sui generis
12. Visiting hours for Sui generis
13. No plant equipment to be fixed to external face of building

### Informative

- 1 Section 278 to be undertaken prior to development
- 2 Footway and the carriageway (Ridgeway)

1.2 That the Head of Development Management be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report

1.3 This planning application is brought to Planning Committee on account of the development categorised as a “major” development, meeting the exception criteria (6), “applications which are advertised as a departure from the DMD and which are recommended for approval”. In accordance with the scheme of delegation, is reported to Planning Committee for determination.

## **2 Executive Summary:**

2.1 The application seeks part retrospective planning permission for the erection of a temporary building (Sui Generis) to provide training facilities; installation of a sports pitch; car parking; hard and soft landscaping.

2.2 The proposals are a direct response to THFC’ s expanding operational needs as they seek to foster and sustain the growth of women in football and move towards the development of a dedicated women’s academy. The temporary building is proposed for a period of three (3) years to provide the THFC women and girls football team/academy with temporary facilities while a permanent training centre is identified and constructed.

2.3 The siting of temporary building is located in the Metropolitan Green Belt and the Forty Hill Conservation Area and falls within the boundary of the existing training centre. The planning submission follows an extant planning application on the same site approved in December 2018 permitting a “formation of outdoor educational

facility comprising ground works to form a nature reserve/ecological known as the western fields". Officers concluded that the facilities were "appropriate" development in the Green Belt and that no harm to the open character of the Green Belt would prevail. The consent was accompanied by a Section 106 (S106) Agreement which secured access to the education and sports facilities within both the nature reserve and proposed building for local schools, alongside the wider Club use. This included the allocation of a dedicated space (200sqm) within the proposed building for use by schools

- 2.4 The current planning application is separate from the extant planning permission but there are crossover elements, and the extant approval is a significant material factor in the support of the current planning application.
- 2.5 The planning application would be subject to a s106 legal agreement apportioning obligations under planning reference 17/01178/FUL for school and community groups visits to the site. the details of which are expanded in section 9 of the committee report.

### **3 Site and Surroundings:**

- 3.1 The application site lies directly to the west of the THFC Training Centre and occupies an area known as Western Field. The area contains hard standing in its eastern part which is used for the storage of horticultural machinery and the Club's green waste management activities. This aforementioned area only forms a modest part of the development site but leads off the internal road to/from the temporary training centre.
- 3.2 The eastern part is undeveloped and comprises elevated bunds to all sides with local depressions to allow access. These bunds raise the topography considerably and restrict views into and out of the Site from any surrounding public vantage points.
- 3.3 Immediately to the south lies an area of dense woodland known as Archers Wood. To the west, beyond the elevated bund, lies land known as Dickinson's Meadow: an existing woodland, does not form part of current development site. Whitewebbs Lane bounds the north of the Site.
- 3.4 The temporary Women's training building, pitch, car park and bund height changes have already been implemented. As a result, the proposal is substantively retrospective.
- 3.5 There is no access through the site, however there is a public path and bridleway along the eastern and western boundaries. A stream runs along the eastern boundary. The application site sits within the Forty Hill Conservation Area and the Metropolitan Green Belt. The site also forms part of a designated Area of Archaeological Importance. Dicken's Trough is a designated Site of Metropolitan Importance for ("SMINC").

### **4 Proposal:**

- 4.1 Planning permission is sought for the erection and operation of the temporary training building for a period of three (3) years, twenty-seven (27) car spaces (associated hardstanding), installation of training pitch and associated soft landscaping. The proposal has already been largely implemented and thus, part retrospective planning permission is being sought.

- 4.2 The temporary training building has a dual pitch roof with a maximum height of 6.25m and has a footprint area of approximately 515m<sup>2</sup>. The elevations comprise timber cladding with black PVC windows and a light grey aluminium roof. The temporary building is located to the south-east of the development site in close proximity to Archer's Wood forming the southern boundary of the site.
- 4.3 The training pitch is of high quality manicured turf reflecting its intended requirements and the parking is located to the east of the temporary training building.
- 4.4 The temporary building and associated facilities provide a dedicated on-site facility training centre for the women's team.

## **5 Relevant Planning History:**

- 5.1 Reference – 17/01178/FUL  
Development – Formation of outdoor educational facility comprising ground works to form a nature reserve/ecological enhanced area together with erection of a single storey detached building with basement for education, sports and leisure uses, a 4-pitch Multi Use Sports Pitch with spectator stands and floodlighting, associated car parking and ancillary works.  
Decision – Granted subject to a s106 legal agreement – 21/12/2018
- 5.2 Reference - 21/01648/FUL  
Development - Part single, part 2-storey extension to the existing Training Centre Building.  
Decision – Granted 19/07/2021
- 5.3 Reference - 21/01648/FUL  
Development - Erection of a single storey extension to existing Training Centre Building (Academy wing).  
Decision – Granted 14/07/2021
- 5.4 Reference - 20/02618/NMA  
Development - Non-material amendment to TP/07/1623 to allow installation of an outdoor teaching area/amphitheatre within the Clubs Training Centre estate.  
Decision – Granted 14/09/2020
- 5.5 Reference - TP/07/1623  
Development - Construction of a football training centre comprising a building incorporating training and associated facilities, ancillary buildings and plant, external pitches, access roads, parking, pathways, fences and external lighting.  
Decision – Granted subject to s106 legal agreement – 11/04/2008
- 5.6 Reference - TP/09/1658  
Development - Construction of a football training centre comprising a building incorporating training and associated facilities. (Amended design of approved scheme under Ref TP/07/1623)  
Decision – Granted subject to conditions 19/01/2010
- 5.7 Ref 21/00923/PREHER  
Pre-application advice was provided in September 2021 on similar scheme and was broadly positive to the proposed development on core material planning considerations but subject to the temporary nature and further information to be submitted.

## **6 Consultation:**

### Public Response

- 6.1 Two rounds of neighbouring consultation letters have been sent out during the period of the planning application. In each of the two rounds on 04/11/2021 and 31/01/2022, 18 neighbouring properties received letters.
- 6.2 The development was advertised in the Enfield Independent on the 24/11/2021 on the basis of a major planning application for wider consultation and departure from Policy in Green Belt.
- 6.3 At the time of writing the report the Council, had received 2 objections. Two objections were received in Round 1 and in Round 2, the same objections were received again. The concerns have been summarised below,
- Affect local ecology
  - Out of keeping with character of area
  - Overdevelopment

### Statutory and Non-Statutory Consultees

#### *Internal Consultees*

- 6.4 Transportation & Transport – comments are incorporated in the main body of the report (Paras. 8.32 -8.44)
- 6.5 Sustainable Drainage - A pre-commencement planning condition is applied to the development and further comments are incorporated in the main body of the report (Paras. 8.29 to 8.31)
- 6.6 Tree officer - No objection is raised to the scheme. Further comments are incorporated in the main body of the report (Para. 8.47)
- 6.7 Environmental Health - No objection subject to planning conditions (Para 8.43)

#### *External Consultees*

- 6.8 Thames Water – No objection to development subject to informatives.
- 6.9 Metropolitan Police (Secure by Design) – if minded to approve, secured by Design condition should be applied, we request the completion of the relevant Secured by Design application forms at the earliest opportunity.
- 6.10 Cadent Gas – The building is close to a gas asset however the tracking of the asset and the location to the building do not warrant an objection.
- 6.11 Historic England - the site is considered to have a low archaeological potential. The proposal is unlikely to have a significant effect on heritage assets of archaeological interest.
- 6.12 Forty Hill Study Group – object to the development on the following grounds #
- Inappropriate development in the Green Belt
  - Impact on the Conservation area
  - Impact on the local footpath network



- Impact on wildlife
- Sustainability of the building
- Transport concerns
- Legal framework

- 6.13 Friends of Forty Hill – Objection to development based on the following,
- Neither preserve nor enhance conservation area
  - Inappropriate Green Belt
  - design of building
  - Impact on ecology
  - Adverse impact on park users

Officer response to comments

- 6.14 *The material planning concerns within the objection letters have been considered by officers during the recommendation of the planning application. Officers visited the site several times to make assessment of the hi-lighted concerns. Green Belt and ecology objections have been raised via two local groups during the consultation period. The principle of the temporary training ground in these regards are discussed with the relevant sections of the report against adopted planning policy.*
- 6.15 *The development shall be subject to a range of planning conditions and a time limited temporary permission period.*

**7 Relevant Policies:**

- 7.1 Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions 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.
- 7.2 The “development plan “comprises the recently adopted London Plan 2021 and the Council’s own Core Strategy (2010) and Development Management Document (2014)
- 7.3 Key relevant policy objectives in NPPF (2021) to the site are referred to below,
- Section 12 – Achieving well-designed places, Para 126-136  
Section 13 – Protecting Green Belt Land Para 137-151  
Section 16 - Conserving and enhancing the historic environment Para 189-208
- 7.4 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,
- GG1: Building Strong and Inclusive Communities  
D3: Optimising site capacity through the design-led approach  
D4: Delivering good design  
D5: Inclusive design  
D14: Noise

S5: Sports and recreation facilities  
HC1: Heritage conservation and growth  
G1: Green Infrastructure  
G2: London's Green Belt  
G4: Open space  
G5: Urban Greening  
G6: Biodiversity and Access to Nature  
G7: Trees and Woodland  
SI13: Sustainable drainage  
SI5: Water Infrastructure  
SI7: Reducing Waste and Supporting the Circular Economy  
T1: Strategic approach to transport  
T3: Transport capacity, connectivity and safeguarding  
T4: Assessing and mitigating transport impacts  
T5: Cycling  
T6: Car Parking  
T7: Deliveries, Servicing and Construction  
T9: Funding transport infrastructure through planning

#### 7.5 Local Plan – Overview

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

#### 7.6 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. The following is considered particularly relevant

CP9: Supporting community cohesion  
CP20: Sustainable energy use and energy infrastructure  
CP21: Delivering sustainable water supply, drainage and sewerage infrastructure  
CP22: Delivering sustainable waste management  
CP25: Pedestrians and cyclists  
CP30: Maintaining and improving the quality of the built and open environment  
CP31: Built and Landscape Heritage  
CP32: Pollution  
CP33: Green Belt and Countryside  
CP36: Biodiversity  
CP46: Infrastructure contributions

## 7.7 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:

DMD37: Achieving High Quality Design-Led Development

DMD38: Design Process

DMD44: Conserving and Enhancing heritage Assets

DMD45: Parking Standards

DMD47: New Roads, Access and Servicing

DMD48: Transport Assessments

DMD51: Energy Efficiency Standards

DMD58: Water Efficiency

DMD61: Managing Surface Water

DMD68: Noise

DMD69: Light Pollution

DMD72: Open Space Provision

DMD79: Ecological Enhancements

DMD80: Trees on Development sites

DMD81: Landscaping

DMD82: Protecting the Green Belt

DMD Appendix 9 - Road classifications

### Other material Considerations

- 7.8 National Planning Practice Guidance  
Community Infrastructure Levy Regulations 2010  
LBE S106 SPD (Adopted 2016)

### Enfield Local Plan (Reg 18) 2021

- 7.9 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.
- 7.10 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. Little weight shall be afforded to the Draft Enfield Local plan (Reg 18), as per NPPF paragraph 48 however where applicable draft policies shall be addressed.

## **8 Analysis:**

### Background:

- 8.1 Tottenham Hotspur FC Training Centre was granted planning permission on 11 April 2008 (ref. TP/07/1623, as amended by TP/09/1658) and has been fully operational since 2012. The facility has been recognised as one of the finest facilities of its kind in the world, providing improved pathways for young footballers and attracting world class sport to Enfield. As well as the first team, the Training Centre provides first class facilities for its Academy and women's teams.

- 8.2 Since the first operational use of the training centre commenced, other piecemeal changes and extensions have been approved primarily in the form of minor additions and ancillary extensions to existing buildings / structures around the site but more recently including a two storey extension to the main building on the north elevation to provide on-site media facilities.
- 8.3 A further addition to the site complex on land known as “Western Fields”, located on the western side of the site and adjacent to Whitewebbs Lane, was approved to provide a multi-functional training and educational centre, alongside associated training pitches and parking. The development of the Western Fields included the creation of a Local nature reserve on the site of Dickens Trough Meadow. The related planning conditions for the Western Fields development (Ref 17/01178/FUL) were partially discharged in 2021 to enable development to commence while elements of this permission have commenced and completed.

Analysis:

- 8.4 This report sets out the analysis of the issues that arise from the proposed development assessed against National, Regional and adopted strategic and Local planning policies.
- 8.5 The main considerations of the development are the following,
- Principle of development in Green Belt
  - Impact on Heritage and Character
  - Design quality
  - Impact on neighbouring amenity
  - Sustainable drainage and water infrastructure
  - Highway and transport implications
  - Other Matters
  - Section 106 agreement and planning obligations
  - Community infrastructure Levy

Principle of Development in Green Belt:

- 8.6 Para 137 of the NPPF (2021) states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 8.7 Para 138 identifies that the Green Belt serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
  - b) to prevent neighbouring towns merging into one another;
  - c) to assist in safeguarding the countryside from encroachment;
  - d) to preserve the setting and special character of historic towns; and
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 8.8 Para 147 advises that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Para 148 builds on this definition stating that “when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential

harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

8.9 New buildings are generally considered as inappropriate in the Green Belt. However, there are exceptions to this and these are specified at Para 149 of the NPPF. These are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
  - not have a greater impact on the openness of the Green Belt than the existing development; or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

8.10 Policy G2 of the London Plan (2021) states, the Green Belt should be protected from inappropriate development. Development proposals that constitute inappropriate development and would harm the Green Belt should be refused except where very special circumstances exist.

8.11 In principle, and with reference to (b) above, open recreation and ancillary building and / or structures that support this open recreational use, can be supported. The proposed development does in principle, fall within the scope of this definition.

#### Temporary Training Building

8.12 The principle of a multi-functional training building on this site was established by the granting of planning permission under reference 17/01178/FUL. This involved the “development and formation of outdoor educational facility” and permitted a two storey (basement and ground floor) training and educational centre located approximately 25m from the position of the proposed temporary building.

8.13 This current application proposes a single storey building sited in the south-east corner of the site, extending to a maximum of height of 6.25m and providing 515sqm (GIA) of floorspace. The building would provide the necessary facilities to support and expand the women’s facilities including: improved changing and support facilities for players and staff; new treatment rooms; office and meeting space; gym; dining space; and storage and ancillary areas. As a result, it is considered an appropriate form of development in terms of the land’s green belt designation.

- 8.14 The principal difference between the proposed building (now built ) and the 2018 approval is the massing above ground floor level. The focus of the assessment of acceptability is therefore the effect on the character / openness of the Green Belt and Forty Hill Conservation Area.
- 8.15 The temporary building represents 25% less total cubic volume than the extant building. However, the volume is all above ground level and the more pertinent comparative to be addressed against Green Belt policy, is the massing above ground level and its effect on the character and openness of the area. The extant training/educational building is approximately 313m<sup>2</sup> at ground level versus 515m<sup>2</sup> for the existing/retrospective temporary building. In addition, the height differential is 6.5m versus the extant 4.5m height. The current proposal, therefore, represents a larger building above ground level.
- 8.16 The Committee report for the part extant approval (ref 17/01178/FUL) concluded in para 6.3.5,
- “The provision of the playing pitch is ancillary to the wider use of the site as a football training centre, an appropriate use within the Green Belt. *The proposed building, with its classrooms and changing rooms supports the function of the training centre, and due to its size (above ground) is also considered appropriate in Green Belt terms*”.
- 8.17 The Committee report continued to clarify the principle of the training centre against Green Belt policy under para. 6.3.7 stating “ the Training Centre would continue to operate effectively without the provision of this facility, however providing a dedicated teaching space adjacent to an existing SMINC which will be enhanced (in addition to the enhancements to the Western Field), *will result in a greater benefit to schools and the community than the existing offer*. This was a key justification underpinning the support for this proposal which does not apply to the current proposal.
- 8.18 The Applicant has indicated that it remains their intent to implement the combined training / education facility approved under 17/01178/FUL) and in this regard, has partially implemented the permission. Nevertheless, the current proposal needs to be assessed to establish its acceptability.
- 8.19 The overarching national planning policy and the development plan policies affecting Green Belt development since 2017 has not changed to any material extent such that the broad conclusions in the 2018 decision remain applicable.
- 8.20 The main differences are the visible mass and size of the structure and the absence in the current building of 200m<sup>2</sup> of dedicated classroom space/area for the teaching of local children subject to the agreed and signed s106 legal agreement.
- 8.21 As indicated above, the Applicant has confirmed their intention to bring forward the educational component but to support the ongoing development of the women’s teams, it was necessary to bring forward this temporary development.
- 8.22 The temporary nature of the building and restricted period of three (3) years, provides assurance which the Council can control through condition, that the building shall not be of permanence in its current form without further agreement. However given the temporary nature of the building, its location and appearance as well as the limited external visibility due to the existing bunds, despite the greater massing, it is

considered the building is visually acceptable and that for the limited period, the benefits of the building /development outweigh the greater visual presence.

8.23 The building is therefore considered to be “appropriate” Green Belt development on the grounds that it provides appropriate facilities for outdoor sport and recreation; it preserves the openness of the Green Belt; and it does not conflict with the purposes of including land within the Green Belt; for the following reasons:

- The building is deliberately positioned in the south-east corner of the Site to mitigate its visual impact. It would be well screened on all sides given the existing bunds and the presence of Archers Wood.
- The use of timber cladding would further blend the building into the natural landscape.
- The building is entirely temporary in its nature. This would avoid any permanent installation into the Green Belt in this location. It would temporarily operate before the permitted permanent building is delivered. The impact of the building in both a temporal and spatial sense will be no greater than the permitted building, which was considered appropriate development at the time of its determination.
- There would be no conflict with the five purposes of the Green Belt, as identified by Paragraph 134 of the NPPF, given:
  - i) There would be no sprawl of large built-up areas arising.
  - ii) No neighbouring towns would merge, nor are there any historic towns of relevance.
  - lii) The building is contained within established physical boundaries and to be installed for a temporary period only. This would avoid any permanent encroachment into the countryside.

#### *Education and Nature Reserve*

8.24 Of significant weight in the 2018 approval (Ref 17/01178/FUL), was the establishment of the nature reserve on the Dickens Meadow to the west of the site. At the time of writing the report, planning conditions pertaining to the SMINC were partially discharged but formal commencement had not occurred. It is noted that the Nature Reserve area to the west of the site does not form part of this development site scope, but was an exclusive part of the 17/01178/FUL approval. This supports the temporary basis of this proposal

#### Impact on Heritage and character:

8.25 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“Listed Buildings Act”) confirm that special attention shall be paid to the desirability of preserving a listed building or its setting (s.66) and preserving or enhancing the character or appearance of that area (s.72). As confirmed by the Court of Appeal (Civil Division), the decision in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137, it was concluded that where an authority finds that a development proposal would harm the setting of a listed building or the character and appearance of a conservation area, it must give that harm “*considerable importance and weight*”.

8.26 Section 16 of the National Planning Policy Framework (“NPPF”) (Conserving and enhancing the historic environment) advises LPAs in Para 197, “in determining 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 positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

8.27 Policy HC1 (Heritage conservation and growth), part C of the London Plan (2021) states, "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".

8.28 Policy DMD 44 (Conserving and enhancing Heritage Assets) applied in conjunction with Policy CP31 of the Core Strategy (2010) expects the following two points to be addressed when considering development to a listed building or in close proximity thereby affecting the setting of the listed building.

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

(2). The design, materials and detailing of development affecting heritage assets or their setting should preserve the asset in a manner appropriate to its significance.

8.29 The dimensions and appearance of the proposed building together with its location, would not it is considered, cause harm to the Conservation Area. Further considerations in this conclusion are the limited views of the structures from the surrounding area and the temporary period for which planning permission is sought. Regard has also been given to the external appearance of the building with the elevations comprising timber cladding with black PVC windows and a light grey aluminium roof. Overall, it is considered the building is of a high quality design that is sympathetic to the appearance of the Conservation Area and although it is larger, it does not result in harm.

8.30 This approach is consistent with the previous application and weight has been given to the extant planning permission when considering the acceptability of the temporary building on the Forty Hill Conservation Area and there has been no material change in the approach of heritage policy since that time which would affect the assessment.

8.31 As context, Para's 6.2.18, 6.2.19 and 6.2.20 of the Committee report (ref 17/01178/FUL) addressed the heritage assets in depth concluding,

*(6.2.18) "There are several heritage assets upon which the impact of the development was considered against, and these were identified within the supporting Heritage Statement. None of the listed buildings are considered to be harmed by the proposed development primarily due to distancing and intervening structures or landscape features such as hedges or road".*

*(6.2.19). With regard to the conservation area, the site does not fall within any of the identified character areas. Nevertheless, justification for the provision of the Training*



*Centre within the conservation area was rehearsed with the original planning application (ref: TP/07/1623), which in summary concluded that: the site is visually contained due to the presence of hedgerows and dense tree belts and woodland;*

- o the limited impact of the development site on surrounding historic landscape;*
- o the limited impact on character of the Forty Hill Conservation Area;*
- o the preservation of the immediate setting of Forty Hall park;*
- o the preservation and enhancement of the immediate setting of Myddelton House;*
- o and*
- o the enhancement of distant views from Forty Hall through the demolition of the*
- o former sports pavilions.*

*(6.2.20). Having regard to the above, the site will continue to be contained by hedgerows, tree belts and woodland and is located even further away from the important viewing corridors of Forty Hall and Myddelton House. The character, setting and special interest of the designated and undesignated heritage assets will not be harmed.*

8.32 The applicants have submitted a Heritage Statement which concludes:

*The proposals have no impact on the designated Listed buildings and their settings.*

*The proposals are not visible in conjunction with buildings or viewpoints identified in the Conservation Area Appraisal.*

*The proposed design and layout are well screened, and are visually unintrusive. It is concluded that no harm would arise to the designated heritage assets in this case.*

*In the unlikely event that any harm would be identified, the relevant Paragraph 202 of the NPPF directs that this is weighed against the public benefits of the proposal. The public benefits in this case clearly outweigh any harm arising. The benefits specifically arising from these temporary works are to enable women's football to access the high quality of the existing facilities within Enfield and to improve the promotion and the availability of future sport facilities and events.*

*As a result, the proposal complies with Local and National policies relating to Listed Buildings and the Conservation Area; and the statutory duty to preserve the special interest of the Heritage Assets will be fulfilled.*

8.33 The Council's heritage officer also raises no objection and comments that, "*having regard for the previous consent and the temporary nature of the scheme (three years), I do not object to permission being granted. Were this to be permission to be revisited again in future for a time extension, the effectiveness of landscape mitigation would need to be re-evaluated*".

8.34 Consideration has also been given to the objections from the Forty Hill Conservation Area Study Group and the Friends of Forty Hill Group on heritage grounds who opine that the character, appearance and special interest of the Conservation Area would be harmed. Officers acknowledge the concerns and recognise, as already mentioned, that the temporary building is taller and has a greater ground floor footprint than previously approved. Nevertheless, the temporary nature and divorced nature from the core heritage assets and proximity to Archer's Wood permits a strong element of screening. The site has existing elevated bund landforms located to all

sides of the perimeter with local depressions to allow access to and from the site. The presence of the bunds further reduces the local visibility of the training pitch and temporary building from views.

- 8.35 Officers consider the development proposals will not lead to any discernible harm to the designated or undesignated heritage assets having regard to Policy HC1 of the London Plan (2021), Core Policy 31, Policy DMD44 of the Enfield Development Management Document (2014), and with section 16 of the NPPF. The development proposals must therefore now be assessed against any other material considerations, in accordance with s.38(6) of the of the 2004 Act and s.70(2) of the T&CPA 1990. A condition is recommended limiting the permission and ensuring its removal should a more permanent solution come forward before the expiration of the three year period.

Design quality:

- 8.36 The existing temporary woman's training building has a pitched roof with a maximum height of 6.25m and covers an area of approximately 515m<sup>2</sup>. The elevations comprise timber cladding with black PVC windows and a light grey aluminium roof. The use of timber cladding is welcomed by officers and on balance, taking account of the building's temporary nature, the appearance of the building is considered acceptable. The applicants have been advised that a permanent building of this form and appearance would not be viewed positively within the respective Green Belt and Conservation Area setting.

Impact on neighbouring amenity:

- 8.37 Policy D6 of the London Plan (2021) 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.
- 8.38 The separation and divorced nature of temporary building from surrounding development means it would have no discernible impact on residential amenity.
- 8.39 Officers note the primary effects to surrounding residential and commercial uses would be related to trip generation arising from the increased activity associated with the use of the site. The transport and movement implications of the development are covered and assessed in the transport section of the committee report.
- 8.40 The impact of the siting, massing and design of the temporary training building would not result in any identified loss to neighbouring residential amenity levels.

Sustainable drainage and water infrastructure:

- 8.41 Policy SI 12 of the London Plan (2021) 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. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63.

- 8.42 The applicant has submitted a SuDS strategy to address the drainage implications of the development. Following a review by the Sustainable officer, no objections are raised subject to conditions regarding the implementation of sustainable drainage measures
- 8.43 In addition, Thames Water have no objection subject to following of the sequential test and confirmation is given the local subsurface sewerage infrastructure is sufficient for the proposed use.

Highway, Access and Parking

- 8.44 Chapter 9 (Promoting Sustainable Transport) of the NPPF (2021) (para 111) states “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.
- 8.45 London Plan (2021) 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 T6.4 sets out car parking standards.
- 8.46 The applicant has submitted Transport Statement prepared by Vectos (Dated August 2021 ref VN212047) to support the training facility and temporary building on transport grounds. The core argument of the transport statement is summarised under para 4.26 of the statement below,
- “the scheme will generate fewer trips than that approved on the same site in 2017, and this modest amount of traffic will not change the nature of highway operation and the junction will continue to operate safely and with minimal delay”.*
- 8.47 The submitted transport statement considers the use of the training pitch and temporary building dedicated to the THFC Women’s team academy and compares the extant educational/training centre’s use and the holding of academy matches occasionally on weekday evenings and Saturdays which could have added an extra 25 vehicle arrivals (a mix of cars, minibus and even a coach -confirmed by Para 1.1 of the submitted transport statement). In addition, the extant approval under reference 17/01178/FUL included a 500 seater stand. The stand is not being brought forward under tis permission and thus, it is considered the temporary woman’s training building will generate less traffic with a corresponding lessening of the impacts of the surrounding highway network.
- 8.48 Para 6.8 of the submitted Transport Statement concludes “the development will generate fewer trips than the 2017 application and this modest amount of traffic will not change the nature of highway operation and the junction should continue to operate safely and with minimal delay”.
- 8.49 Although the transport statement includes no predicted attendance numbers or TRICs data and is largely applying a rudimental assessment of the difference is number of attendees between the temporary facility and the educational and training accommodation approved under reference 17/01178/FUL, given the nature of the proposal, it is concluded on balance, the highway impacts would be comparable to the training accommodation approved under 17/01178/FUL. As such, based on the absence of any material increase and the extant permission, no objection on highway grounds is proposed.

### *Vehicle Parking*

- 8.50 The adopted London Plan (2021) does not provide defined parking requirements for the use proposed. Policy T6.4 (Hotel and leisure uses parking) offers the closest comparative parking requirements, set out below,

*“In locations of PTAL 0-3, schemes should be assessed on a case-by- case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels”.*

- 8.51 For clarification, the provision of parking has changed during the planning submission phase, providing twenty-seven (27) spaces (see plan entitled “temporary structure WFT-F3A-ZZ-RF-ST-A-0860 Rev S4.P2) instead of 14 spaces, inclusive of 4 accessible spaces.
- 8.52 Para 6.6.4 of the 2017 Committee report stated “the facility will be semi-private and secure, therefore all day to day access will be via the main Training Centre entrance security building, where personnel and goods for the Environmental Centre can be managed. It is anticipated that all users of the Environmental Centre will park in the designated site car and coach parking area and travel on foot to the facility along an identifiable footpath”.
- 8.53 The proposed provision of parking represents approximately 50% more than the 2018 approval permitted and is considered acceptable given the nature of use and low PTAL level of the site.

### *Cycle provision*

- 8.54 Policy T5 (Cycle Parking) of the London Plan (2021) expects and provides minimum cycle provision for developments. The on-site cycle provision of eight 8 covered cycle spaces provides adequate numbers for the sui generis use. It should be noted the Applicant operates a cycle to work scheme for staff.

### *Refuse/servicing*

- 8.55 The applicant has submitted a Waste Management Plan (WMP) in support of the retrospective planning application. Para 13.1 of the report provides an appropriate table to confirm operational servicing. References to demolition and construction waste with the report are not applicable on account of the retrospective nature of the submission. Officers however consider the details and proposals contained within the report to be sufficient for the use and building.

### *Vehicle Access*

- 8.56 Access to the site is from Whitewebbs Lane via the existing controlled access. This would remain unaltered as a result of this proposal

### Biodiversity & Ecology:

- 8.57 The development area is identified in submitted plan reference WFT-F3A-ZZ-XX-ST-A-0831 (S4.P9) and relates solely to the training pitch, temporary building, car park and vehicular access within the site from the main training centre and from Whitewebbs Lane to the north of the site.

- 8.58 The wider site including the bunds, are subject to details to be discharged by Conditions related to the extant planning permission under ref 17/01178/FUL and referred to in paragraph 5.2 of the Committee report. The conditions and their implementation are separate to the current planning application.
- 8.59 The red line boundary of the site involves no loss of or new of trees being planted. Due to site clearance and the retrospective nature of the building, training pitch and car parking any biodiversity or ecology present on site has been lost. However, the schemes largely follows that previously accepted
- 8.60 The applicant has submitted a Preliminary Ecological Appraisal to look at this application site. It concludes “ *Due to the temporary nature of the structure, the incorporation of ecological enhancement features (e.g. bird and bat boxes) is not considered necessary. Ecological enhancements will be delivered as part of the permanent development consented under planning reference 17/01178/FUL. In addition, it is not considered appropriate to undertake a biodiversity accounting assessment as any biodiversity net gains as measured by a metric will be incorporated into the permanent redevelopment*”
- 8.61 The lighting on the building and within the parking area is shown on plan reference external lighting (Ref WFT-F3A-ZZ-XX-GA-A-0875 Rev S4-P2) and is considered of limited glare and would not harm potential Bat and bird roosting in Archers Wood. A compliance planning condition has been applied to the recommendation to prevent glare.

#### Sustainable Construction & Energy

- 8.62 The applicant submitted an energy and sustainability report in support of the planning application. The report focuses on the building fabric optimisation and offers improvements over the building regulation requirements in all areas. Overall, and based on the submitted report the building performs very well in the Part L building assessment achieving a 50% reduction over 2013 regulations and gaining a grade “A” EPC classification.

#### Social economic

- 8.63 Enfield Council welcomes the facilities to support the growing demand for high quality woman’s football and move towards greater parity in opportunity and resource provision.
- 8.64 While the temporary building is not designed for use by schools and community groups compared to the extant planning permission Ref 17/01178/FUL, the facility nonetheless provides a high-quality environment for children and disadvantaged groups to use professional facilities of regionally important football club.
- 8.65 The temporary building provides opportunity for specialist coach training, albeit for a finite three (3) years of the building in situ.

### **9 Section 106 agreement:**

- 9.1 The planning application is subject to a s106 legal agreement.

- 9.2 The extant permission for the training and education centre under Ref 17/01178/FUL was subject to a s106 legal agreement dated 21<sup>st</sup> December 2018. As part of the agreement (schedule 2) the spurs environmental Centre (“SEC”) would be constructed and would facilitate a school visits programme inclusive of 200m<sup>2</sup> classroom space for use by qualifying schools. A fund of £312,000 was allocated based on £750 per school visit totalling 416 school visits. The programme was designed to last ten (10 years
- 9.3 During discussions with the agent for THFC, agreement has been reached whereby a proportionate three (3) years of the school programme shall be apportioned to the temporary Women’s and Ladies training building and a new s106 legal agreement signed with appropriate and policy compliant triggers to identify and account for use by local school
- 9.4 The s106 shall be subject to LBE Management monitoring fee for the apportioned three (3) year school programme.

## **10 Community Infrastructure Levy (CIL)**

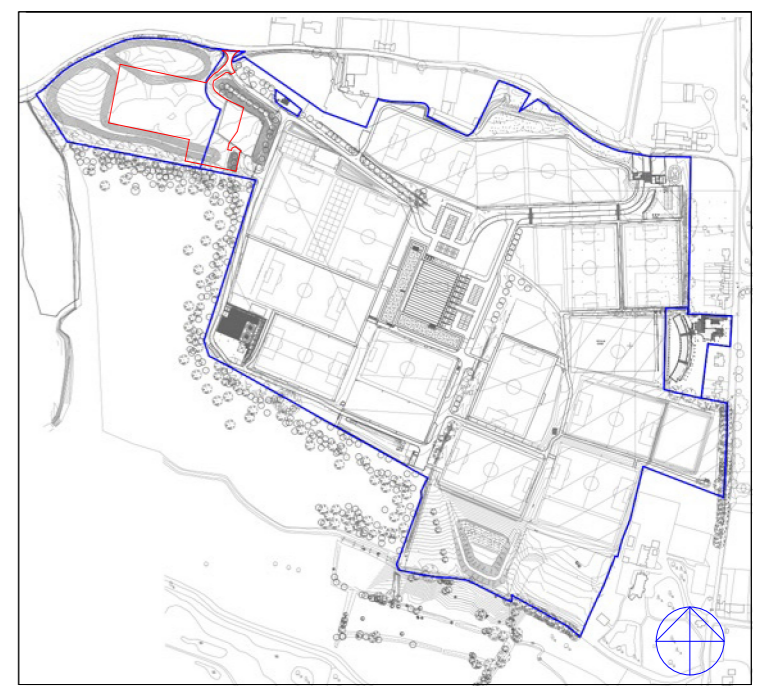
- 10.1 The Mayoral and Enfield CIL is not liable on the development due to the temporary nature of the planning application.

## **11. Public Sector Equality Duty**

- 11.1 In accordance with 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.

## **12. Conclusion:**

- 12.1 The building is considered to constitute an ancillary building in the context of green belt policy and thus is considered to represent appropriate and thereby, an acceptable form of development for the location.
- 12.2 It is recognised permission is sought for a temporary period of 3 years and taking this into account, the proposed design, massing and scale of the temporary building is considered acceptable in terms of its relationship to the green belt and the conservation, where it is concluded no harm arises.
- 12.3 The absence of any discernible increase to vehicles movements is noted as is the relationship of the development to issues of biodiversity, landscaping and sustainability. There are also no concerns in respect of sustainable drainage.
- 12.4 As a result overall, officers consider the planning application to be acceptable for the aforementioned reasons.



KEY PLAN

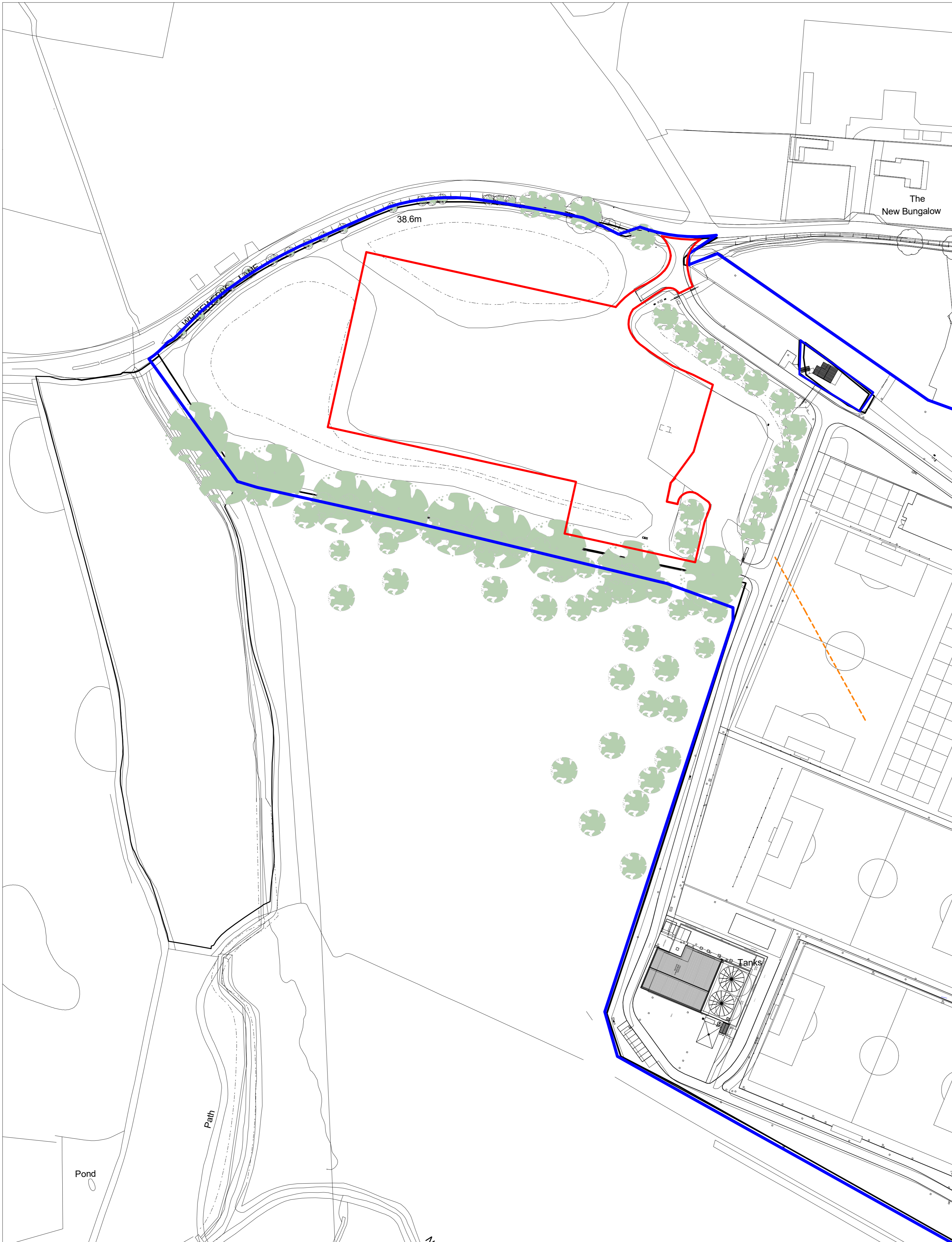
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1 EXISTING SITE LOCATION (OS BASED)  
 0836 SCALE 1: 1000

DATE	CHK	DESCRIPTION	STA NO.
18.01.22	CT	PLANNING	S4 IP3
10.12.21	CT	PLANNING	IP2
17.09.21	CT	PLANNING	IP1

REVISION HISTORY



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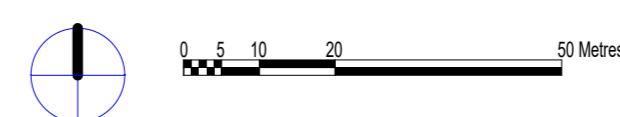
project  
**WESTERN FIELD TEMPORARY STRUCTURE**

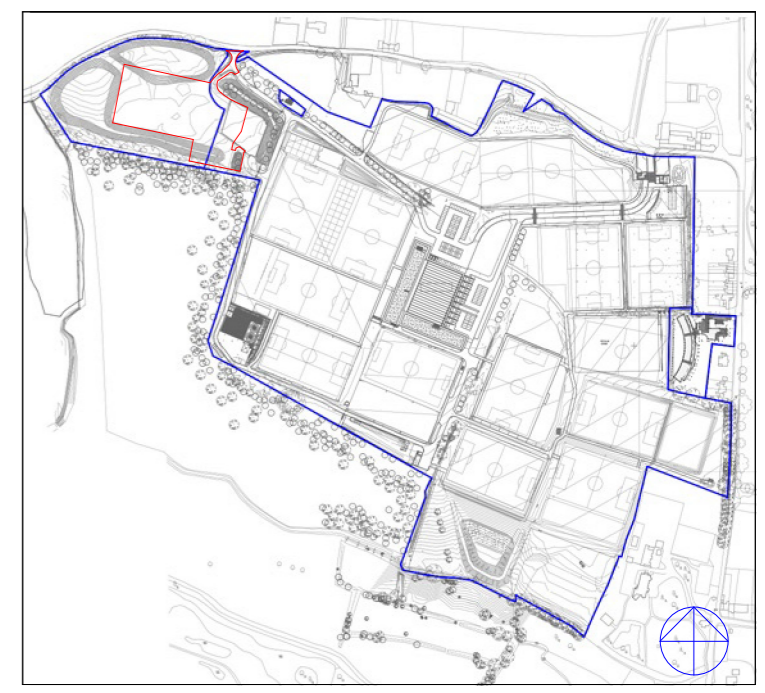
title  
**EXISTING SITE PLAN (OS BASED)**

drawn by	scale	paper	project no
KA	1: 1000	A1	210127

status	revision
S4 - Suitable for stage approval	S4.P3

drawing no  
**WFT-F3A-ZZ-XX-ST-A-0836**





KEY PLAN

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**KEY**

	CAR PARKING SPACES
	8NO. COVERED CYCLE PARKING SPACES

**KEY**

	APPLICATION SITE BOUNDARY
	ADJOINING SITE IN OWNERSHIP OF APPLICANT

DATE	CHK	DESCRIPTION	STA. NO.
19.01.22	CT	PLANNING	S4 P9
18.01.22	CT	PLANNING	S4 P8
10.12.21	CT	PLANNING	P7
17.09.21	CT	PLANNING	P6
13.09.21	CT	PLANNING	P5
11.08.21	CT	PLANNING	P4
06.08.21	KA	PLANNING	P3
04.08.21	KA	ISSUED FOR COORDINATION	P2
30.07.21	CT	PLANNING	P1

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project  
**WESTERN FIELD TEMPORARY STRUCTURE**

title  
**PROPOSED SITE PLAN**

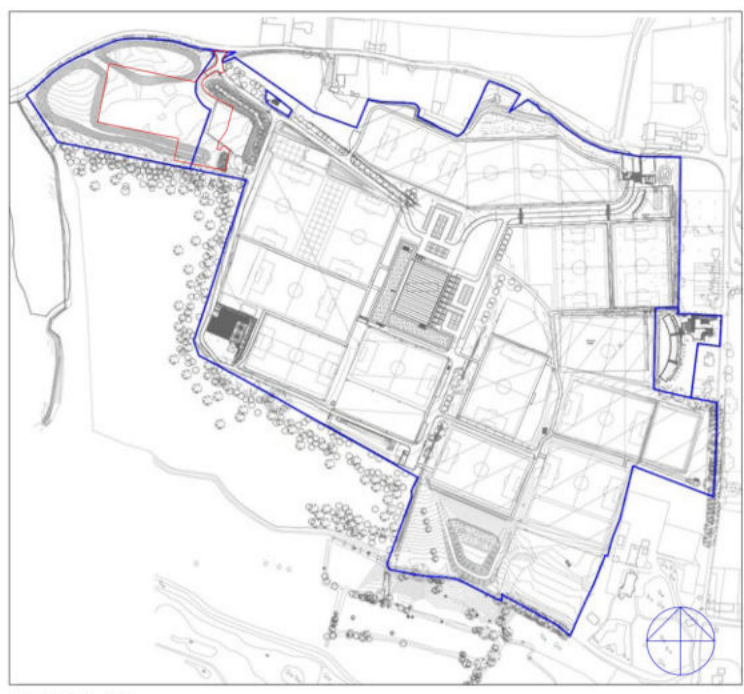
drawn by	scale	paper	project no
<b>KA</b>	<b>As indicated</b>	<b>A1</b>	<b>210127</b>

status	revision
<b>S4 - Suitable for stage approval</b>	<b>S4.P9</b>

drawing no  
**WFT-F3A-ZZ-XX-ST-A-0831**

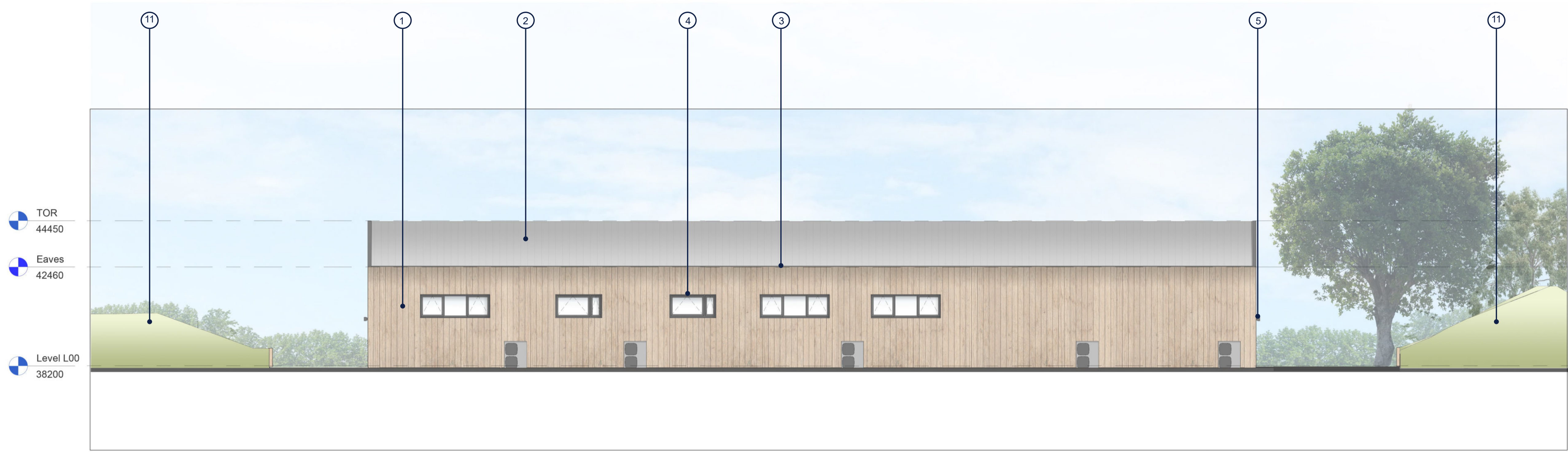






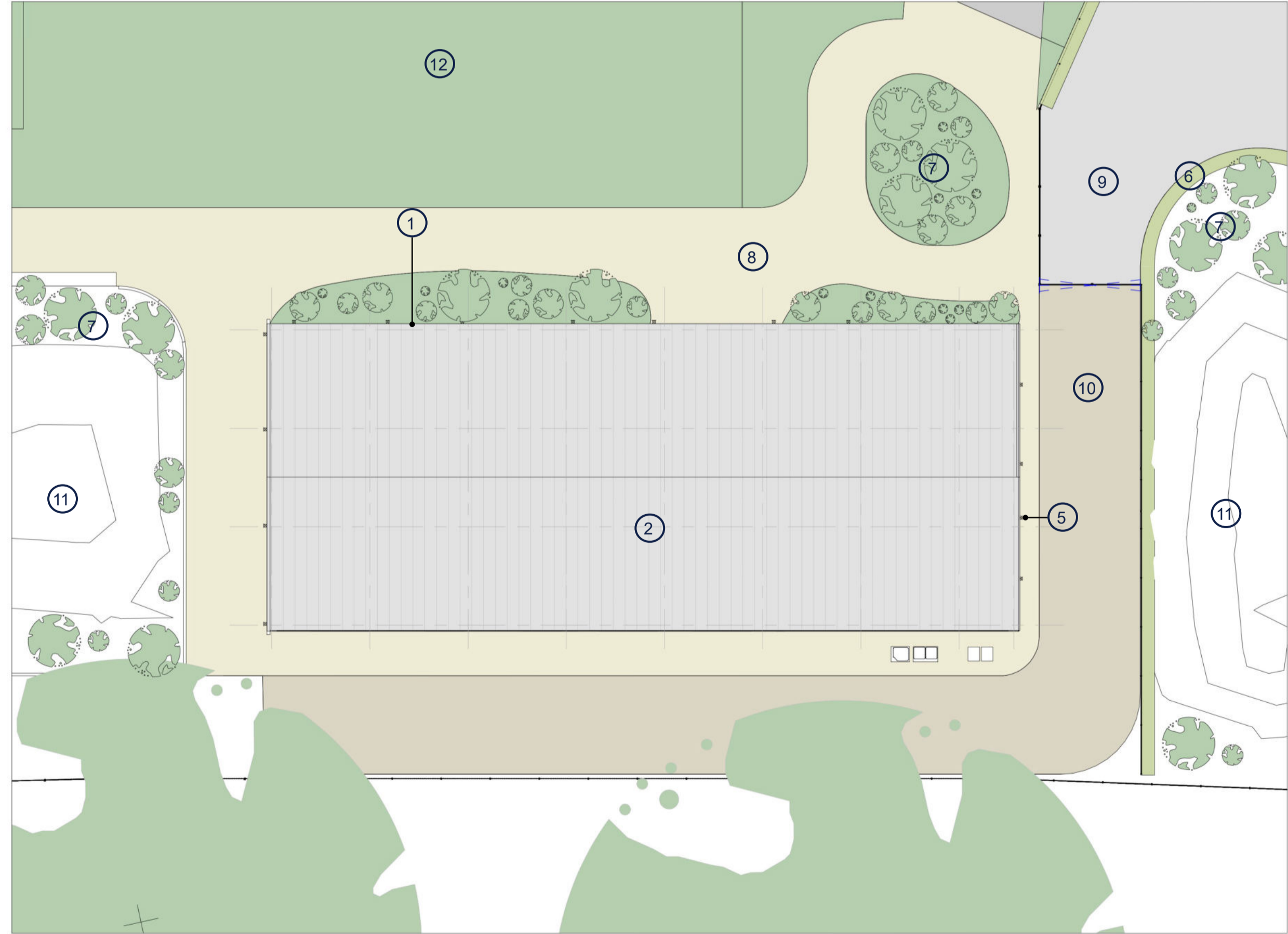
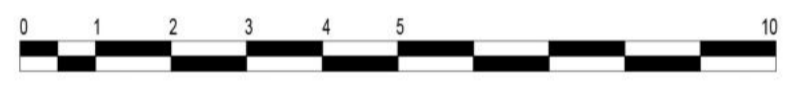
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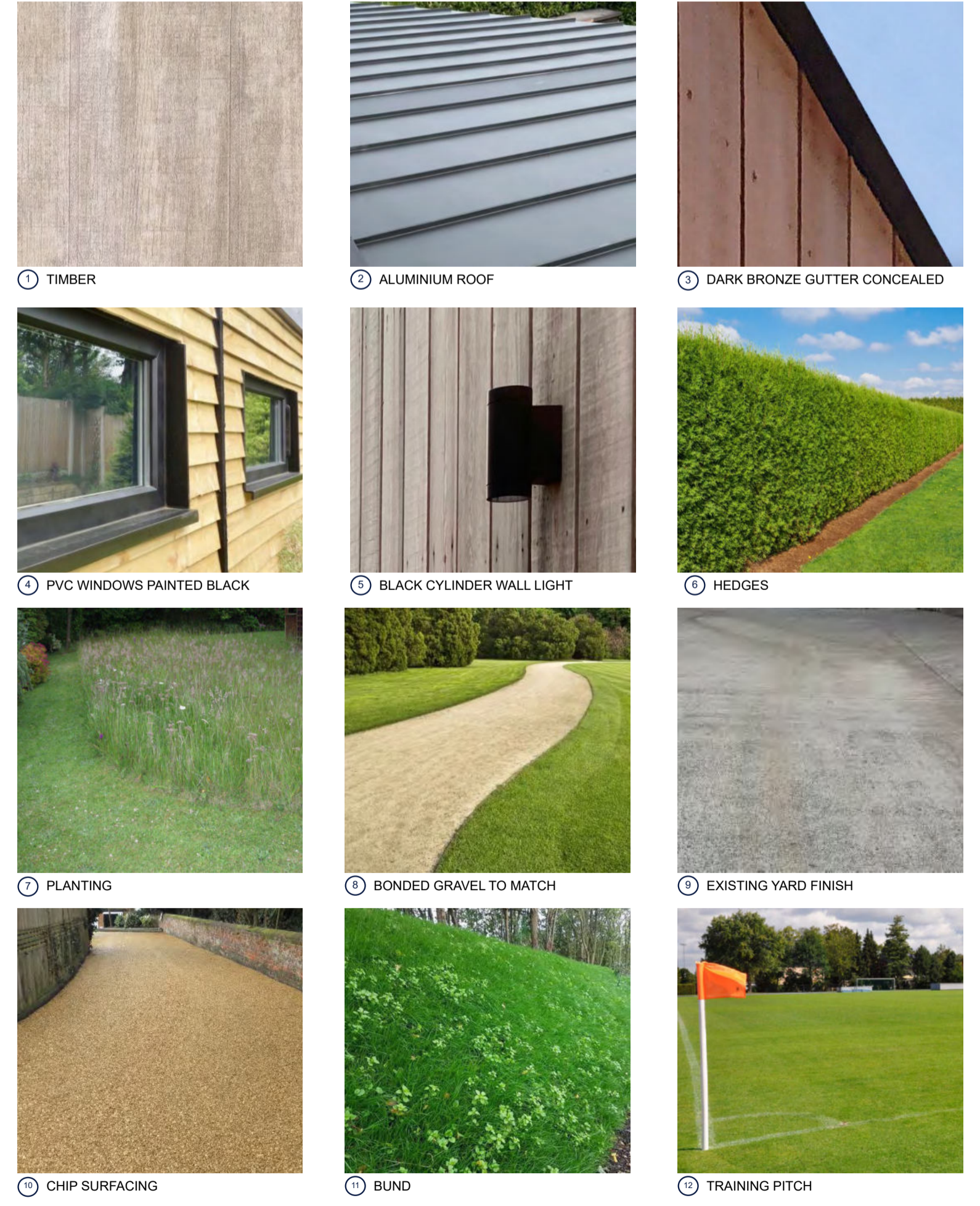


TOR  
44450  
 Eaves  
42460  
 Level L00  
38200

**1 MATERIAL STUDY - NORTH ELEVATION**  
 SCALE 1 : 100



**2 MATERIALS STUDY ROOF PLAN**  
 SCALE 1 : 200



- 1 FACADE FINISH - TIMBER
- 2 ROOF FINISH -ALUMINIUM
- 3 DARK BRONZE GUTTER CONCEALED
- 4 PVC WINDOWS PAINTED BLACK
- 5 BLACK CYLINDER WALL LIGHT
- 6 HEDGES
- 7 PLANTING
- 8 LANDSCAPING FINISH - BONDED GRAVEL TO MATCH SURROUNDING SURFACE FINISHING
- 9 LANDSCAPING FINISH - EXISTING CONCRETE YARD FINISH
- 10 LANDSCAPING FINISH - CHIP SURFACING
- 11 BUND
- 12 TRAINING PITCH

DATE	CHK	DESCRIPTION	STA NO.
17.09.21	CT	PLANNING	P4
18.09.21	CT	PLANNING	P5
19.09.21	CT	PLANNING	P2
30.07.21	CT	PLANNING	P1

**REVISION HISTORY**

**F3 ARCHITECTURE + INTERIORS**  
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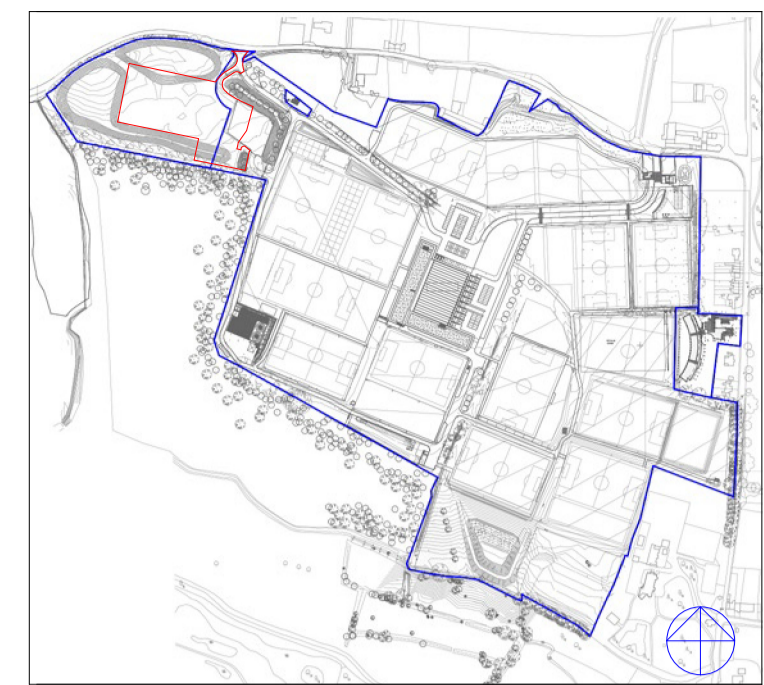
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project  
**WESTERN FIELD TEMPORARY STRUCTURE**

title  
**MATERIAL STUDY**

drawn by	scale	paper	project no
<b>KA</b>	<b>As indicated</b>	<b>A1</b>	<b>210127</b>
status			revision
<b>S4 - Suitable for stage approval</b>			<b>P4</b>
drawing no			
<b>WFT-F3A-ZZ-XX-EL-A-0872</b>			



**KEY PLAN**

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DATE	CHK	DESCRIPTION	STA NO.
19.01.22	CT	PLANNING	S4 P6
10.02.21	CT	PLANNING	P6
17.09.21	CT	PLANNING	P4
13.09.21	CT	PLANNING	P5
11.06.21	CT	PLANNING	P2
30.07.21	CT	PLANNING	P1

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project  
**WESTERN FIELD TEMPORARY STRUCTURE**

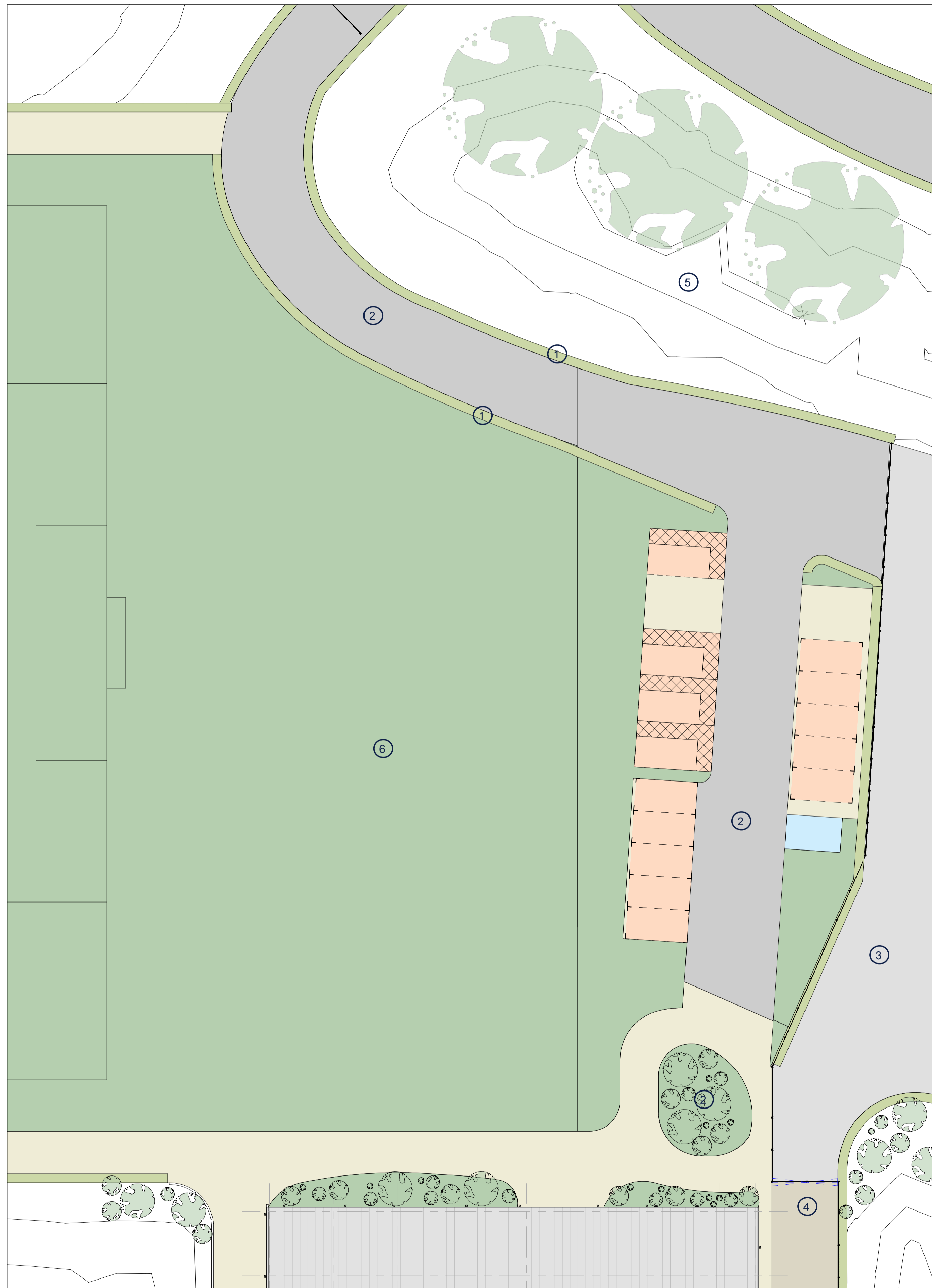
title  
**PROPOSED GA PLAN L00**

drawn by	scale	paper	project no
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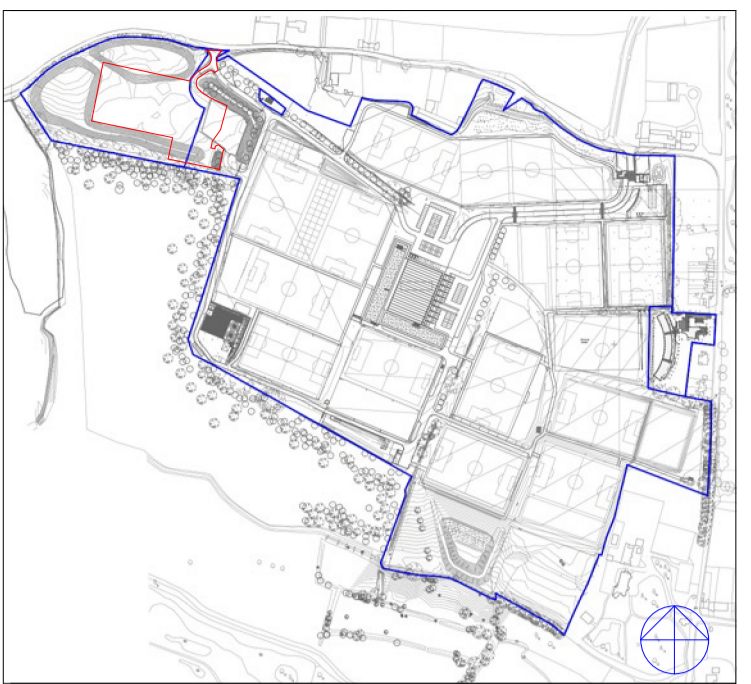
status	revision
S4 - Suitable for stage approval	S4.P6

drawing no  
**WFT-F3A-ZZ-00-GA-A-0801**





1 MATERIALS STUDY - CAR PARKING  
SCALE 1 : 200



KEY PLAN

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DATE	CHK	DESCRIPTION	PI	STA NO.
17.09.21	CT	PLANNING		
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project  
**WESTERN FIELD TEMPORARY STRUCTURE**

title  
**MATERIAL STUDY - CAR PARKING**

drawn by	scale	paper	project no
KA	1 : 200	A1	210127

status	revision
<b>S0 - Work in progress</b>	<b>P1</b>

drawing no  
**WFT-F3A-ZZ-RF-A-0873**



1 HEDGES



2 BONDED GRAVEL TO MATCH



3 EXISTING YARD FINISH



4 CHIP SURFACING



5 BUND

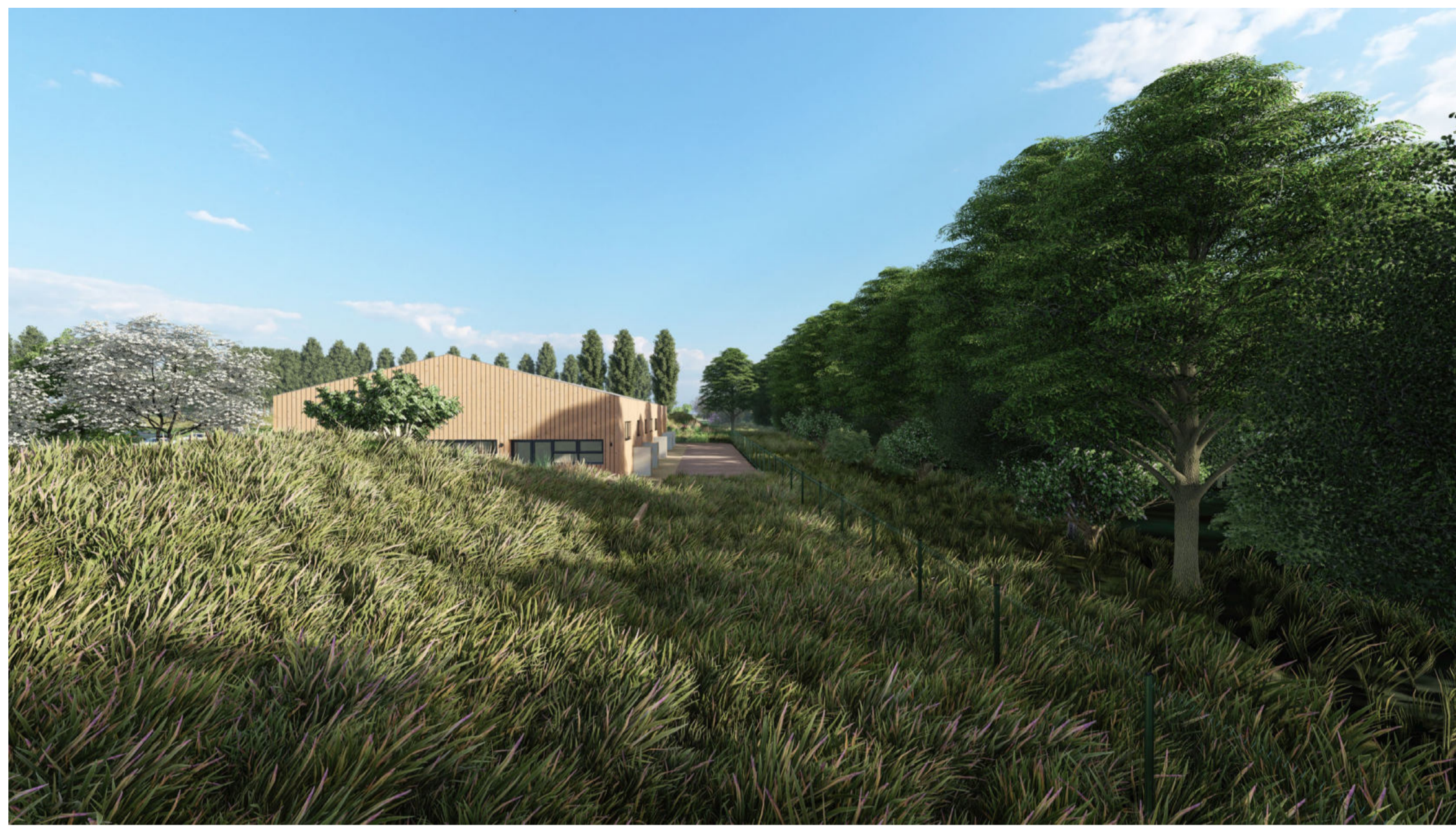


6 TRAINING PITCH

- 1 HEDGES
- 2 LANDSCAPING FINISH - BONDED GRAVEL TO MATCH SURROUNDING SURFACE FINISHING
- 3 LANDSCAPING FINISH - EXISTING CONCRETE YARD FINISH
- 4 LANDSCAPING FINISH - CHIP SURFACING
- 5 BUND
- 6 TRAINING PITCH



CGI 01 - VIEW SOUTH



CGI 04 - VIEW EAST



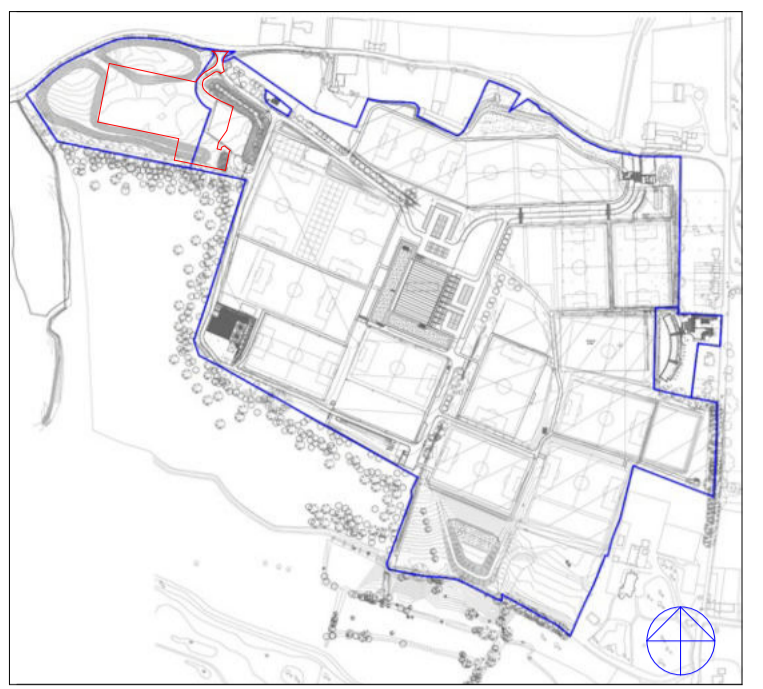
CGI 02 - VIEW EAST



CGI 05 - VIEW WEST



CGI 03 - VIEW SOUTH



KEY PLAN

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DATE	CHK	DESCRIPTION	STA NO.
24.01.22	CT	PLANNING	S4 P7
18.01.22	CT	PLANNING	S4 P6
10.12.21	CT	PLANNING	P5
17.09.21	CT	PLANNING	P4
13.09.21	CT	PLANNING	P3
11.08.21	CT	PLANNING	P2
30.07.21	CT	PLANNING	P1

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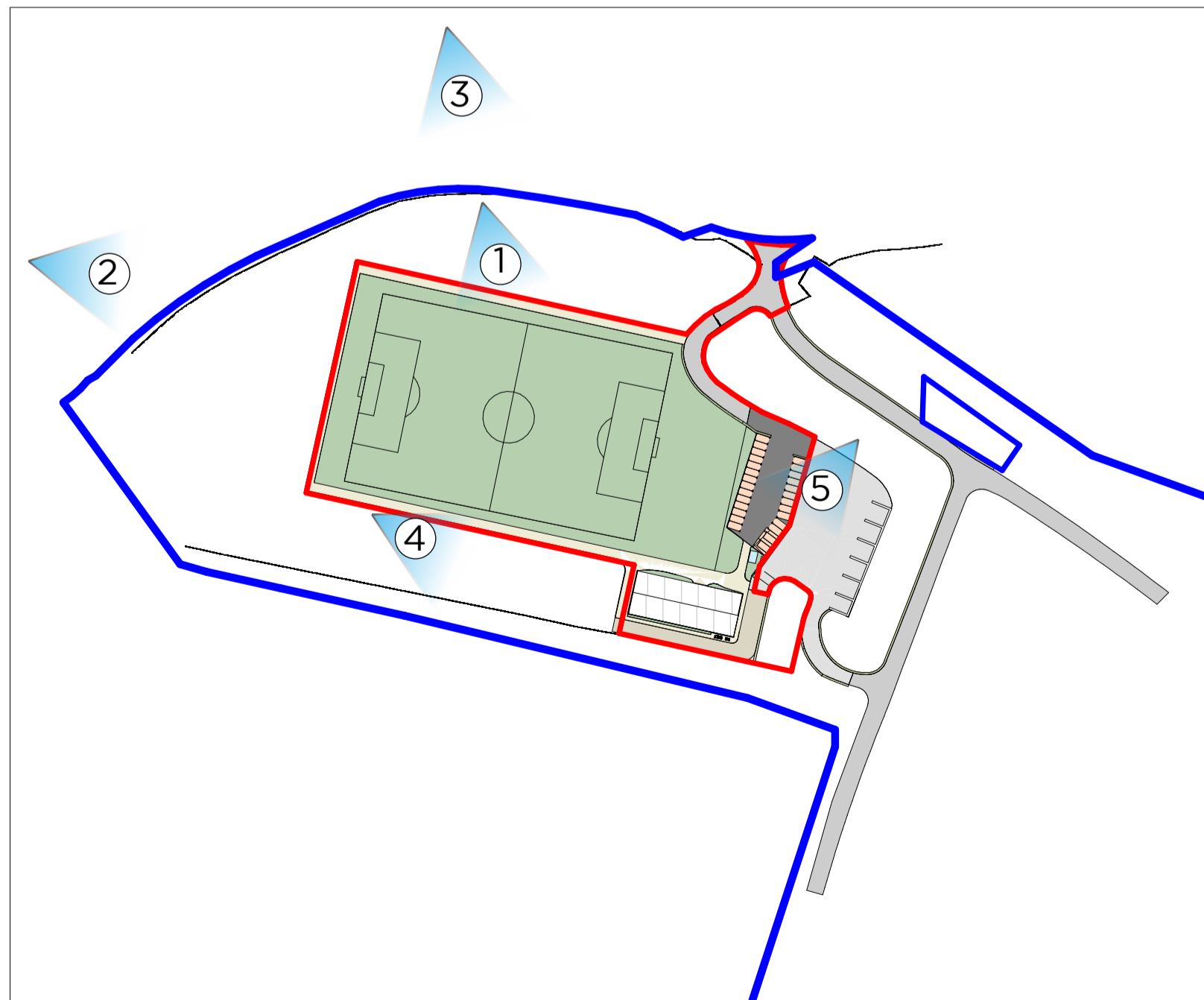
project  
**WESTERN FIELD TEMPORARY STRUCTURE**

title  
**PROPOSED VISUALISATIONS**

drawn by	scale	paper	project no
CT	1 : 2000	A1	210127

status	revision
S4 - Suitable for stage approval	S4.P7

drawing no  
**WFT-F3A-ZZ-XX-3D-A-0870**



1 PROPOSED SITE PLAN KEY CGI  
 0870 SCALE 1 : 2000

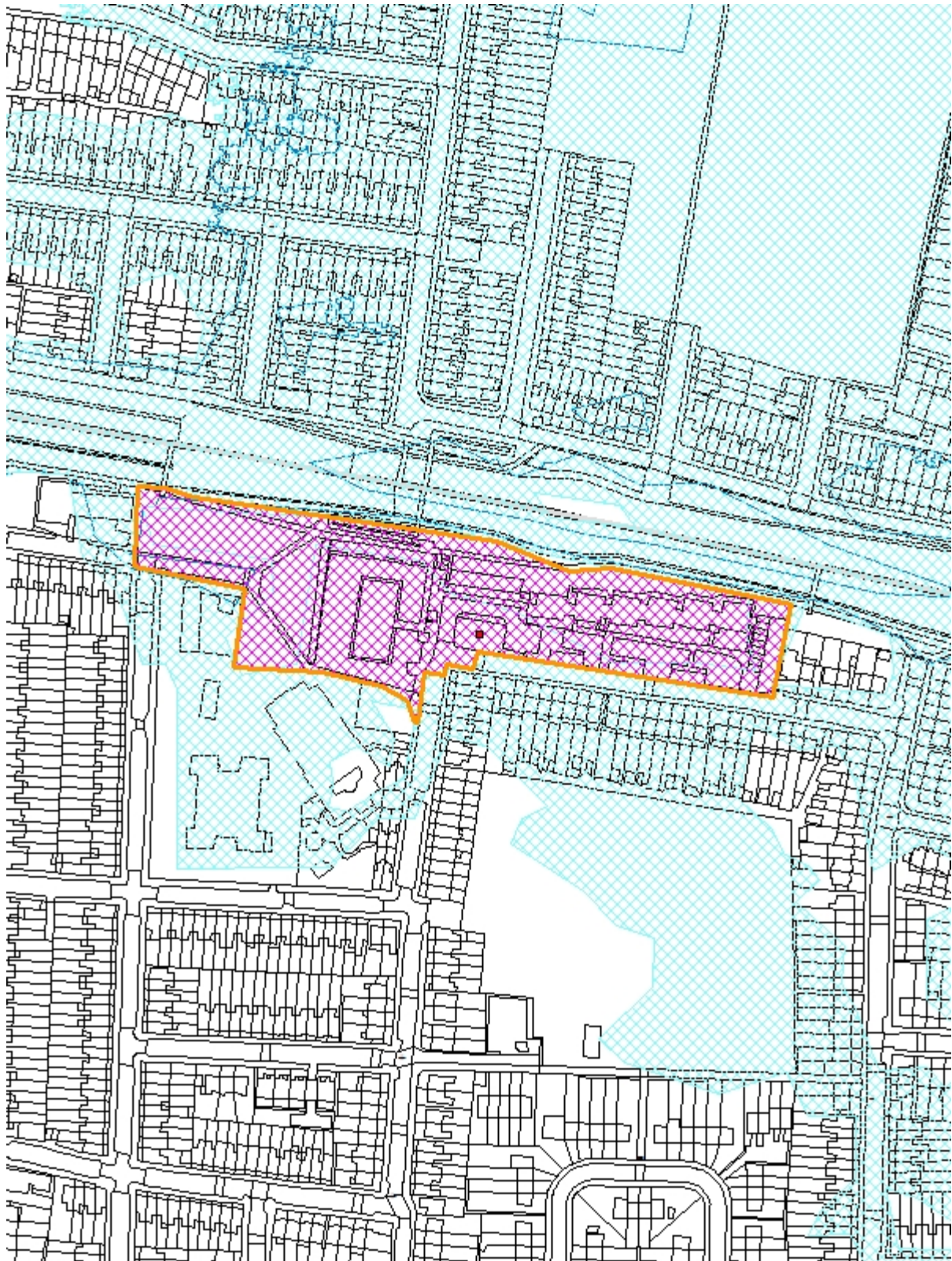
NOTE: RENDERERS ARE AN ILLUSTRATIVE VIEWS ONLY

<b>LONDON BOROUGH OF ENFIELD</b>		
<b>PLANNING COMMITTEE</b>		<b>Date:</b> 8 March 2022
<b>Report of</b> Head of Planning	<b>Contact Officer:</b> Andy Higham Sharon Davidson Karolina Grebowiec-Hall <a href="mailto:karolina.grebowiec-hall@enfield.gov.uk">karolina.grebowiec-hall@enfield.gov.uk</a>	<b>Ward:</b> Upper Edmonton
<b>Application Number:</b> 21/04271/RE4		<b>Category:</b> Major
<b>LOCATION:</b> Upton Road and Raynham Road London N18 2LJ		
<b>PROPOSAL:</b> Demolition of Beck House and garages on Upton Road and construction of 134 residential dwellings (Use Class C3) and up to 188sqm flexible commercial floorspace (Use Class E) comprising buildings up to 7 storeys in height, and the change of use of ancillary garages to part of lower ground floor of Scott House (Use Class C3) to provide up to 70sqm community hall (Use Class F2(b)), 45sqm ancillary management office (Use Class C3), podium deck, along with associated means of access and highways works; car and cycle parking; hard and soft landscaping; play space and public, communal, and private realm; refuse storage; ancillary plant and structures; and works to Scott House to create new access at lower ground and ground floor levels.		
<b>Applicant Name &amp; Address:</b> LBE Housing		<b>Agent Name &amp; Address:</b> HTA, 78 Chamber Street, London, E1 8BL
<b>RECOMMENDATION:</b>		
<p>1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to no objections being received from the Environment Agency, the finalisation of a shadow S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to <b>GRANT</b> planning permission subject to conditions.</p> <p>2 That the Head of Development Management be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.</p>		

## 1. Note for Members

- 1.1 This planning application is categorised as a 'major' planning application and the Council is the landowner and applicant. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

Ref: 21/04271/RE4 LOCATION: Upton Road And Raynham Road, London, N18 2LJ,



## 2. Recommendation

- 2.1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to no objections being received from the Environment Agency, the finalisation of a shadow S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions to cover matters set out below:
- 2.2. That delegated authority be granted to the Head of Development Management to finalise the wording of the shadow S106 obligations and the recommended conditions as set out in this report.
1. Compliance with shadow Section 106 Agreement
  2. Compliance with S106 Obligations
  3. Time limit
  4. Approved drawings (compliance)
  5. Maximum residential units/housing mix
  6. Maximum quantum of commercial floorspace
  7. Restriction on PD changes of use
  8. No fixing of plant and equipment to external facades other than in accordance with approved plans.
  9. Restriction on commercial operating hours
  10. Accessible housing/Wheelchair user dwellings (Minimum number of M4(3))
  11. Acoustic report for mechanical plant
  12. Compliance with Fire Strategy
  13. Tree Protection Plan
  14. Arboricultural Method Statement
  15. No works to trees and shrubs within bird nesting season
  16. Detailed drawings for landscaping, public realm, play equipment and highway works
  17. Landscape and public realm management plan
  18. Details of external materials/sample panels
  19. Living roofs and green wall
  20. Details of PV panels
  21. Lighting
  22. Cycle parking overall provision
  23. Accessible long stay cycle parking
  24. Commercial cycle parking
  25. Podium open space provision
  26. Electrical vehicle charging points
  27. Car parking management plan
  28. Restriction on podium car parking just by Scott House residents
  29. Delivery and servicing plan
  30. NRMM emissions compliance
  31. Secured by Design accreditation
  32. Secured by Design certification
  33. Secured by Design commercial certification
  34. SuDS details
  35. Flood Risk Technical Note
  36. SuDS verification
  37. Levels
  38. Construction Logistics Plan
  39. Construction Environmental Management Plan
  40. Demolition Method Statement

41. Site Waste Management Plan
42. Whole Life Carbon Assessment
43. Water efficiency
44. Energy strategy compliance
45. Energy technical note
46. Energy verification/performance certificates
47. Whole Life-cycle Carbon technical report
48. Circular Economy post completion report
49. Urban Greening Factor
50. Biodiversity enhancements
51. Contamination and remediation
52. Previously unidentified contamination
53. Archaeology
54. Restriction on construction within 5m of water main
55. Requirement for piling method statement
56. Acoustic screen
57. Gating of podium and communal squares
58. Hours for gating eastern courtyard
59. Dropped kerb and tactile paving improvements

### **3. Executive Summary**

- 3.1. The London Borough of Enfield (LBE) Housing Team is seeking to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This includes delivering several housing renewal and estate regeneration schemes across the Borough.
- 3.2. Upton and Raynham has been identified as a key site forming part of LBE's development programme, with a view to extend housing provision on the site to replace the existing Beck House, which is no longer fit for purpose with a greater number of high quality homes, including a significant uplift in affordable housing. Through extensive pre-application discussions with the Local Planning Authority (LPA), inclusive of a review of the development proposal at the Enfield Place and Design Quality Panel, the applicant has developed a comprehensive masterplan and vision for the entire site, which offers a unique opportunity to increase the number of affordable homes whilst better integrating the site into the surrounding community and improving the sense of neighbourhood safety.
- 3.3. The proposal seeks to extend the provision of housing by making more efficient use of land and providing a high quality of homes where the existing building no longer meets the standard of housing that Enfield strives to provide. The replacement of Beck House and development of several infill blocks will allow for the provision of 134 new homes and complete refurbishment of the landscaping and public realm to make better use of the site's open space assets. Enhancements to amenity and overall design will help to address issues of security on the site.
- 3.4. The development proposes that 69% of the gross number of new housing units will be affordable, split across London Affordable Rent and shared ownership tenures.



- 3.5. The applicant has set out in detail the impacts to neighbouring residential amenity and pre-application discussions have shaped the development to the extent that officers are satisfied the development will result in no unacceptable adverse impact to neighbouring residential amenity.
- 3.6. The primary public benefits of the scheme can be summarised as follows:
- Optimising the site – making effective use of a brownfield site
  - Making a significant contribution to the Borough’s housing target including the delivery of 53 family-sized homes
  - Delivery of 92 affordable homes, comprising 69% of the total gross housing offer
  - Inclusion of a community hall in the lower ground floor of Scott House
  - New, modern and well-located accommodation for commercial units
  - Complete overhaul of landscaping and public realm throughout the site to provide functional outdoor amenity space, private garden spaces and several play areas
  - Greener routes and strategic cycle and pedestrian connections
  - On-site biodiversity enhancements
  - More than a doubling of the numbers of trees that currently exist on the site
  - S106 contributions towards improvements to local area play provision
  - Rationalisation of the Scott House entrance with accessible and attractive access
  - Achieving net zero carbon emissions through connection to the Enfield District Heat Network and offset contributions, among other measures
  - Integration of on-site sustainable urban drainage measures

#### **4. Site and Surroundings**

- 4.1. The Site covers an area of 1.43 hectares and currently includes two buildings: Beck House to the east and Scott House located centrally within the Site.
- 4.2. Beck House was built in the 1965 and is a ‘brutalist’ building of between two and four storeys running parallel with Upton Road. The three-storey section to the west contains 12 vacant flats with an access balcony running the full length of the second and third floors. The central four-storey section consists of shops to the ground floor and vacant 1-bedroom flats to the second and third floors. The fourth floor is an open roof / terrace area. This section of Beck House is owned by the Council and is in a state of substantial disrepair, with the flats unoccupied and boarded up. The two ground floor retail units are currently in use as a convenience store and hot-food takeaway respectively. There is a large over-sailing canopy to the shops and garages, which makes up the main Upton Road frontage.
- 4.3. The eastern part of Beck House drops to two-storeys and is of a staggered form. Until recently, this part of the building was owned by Riverside Housing Association and provided 34 bedsit (studio) flats as supported housing for single or childless couples ages 18 to 64 with support issues or those at serious risk of becoming homeless. These flats were more recently used as temporary emergency accommodation for rough sleepers. However, the building is now vacant with this use being re-provided elsewhere in the Borough by the Council. There is an area of underutilised green space and car parking located between the eastern park of Beck House and Upton Road to the south.

- 4.4. Scott House, originally named Angel House and also built in 1965, is an 18-storey residential block comprised of 101 social rent flats owned by the Council. The land immediately around the base of the tower has been excavated to provide parking and garages approximately two metres below the main pedestrian access to the block via a raised walkway to the east at upper ground floor level. The garages are no longer used for parking by residents. To the west of Scott House, beyond the sunken car park, is an undeveloped area of grass with paths providing pedestrian access to Raynham Road. To the north of Scott House is a pedestrian ramp that is owned and operated by Transport for London (TfL), which provides pedestrian and cycle access over the North Circular Road to Kings /Aberdeen Road to the north.
- 4.5. Given its central location within the Site, Scott House divides the western and eastern halves, disrupting legibility to and around the Site. It has a dominating presence within the immediate townscape where buildings typically do not exceed four-storeys in height.
- 4.6. The buildings on-site are interspersed with areas of hard and soft landscape of varying quality including areas of underutilised grassland and scattered trees with shrub and tree planting along the Site boundary to the north adjacent to the North Circular Road. Large areas of the Site are currently given over to roadways, footpaths and vehicle parking.
- 4.7. The surrounding context to the south and east is predominantly low rise, early 20th century housing with a coherent street pattern in terraced rows or pairs. Raynham Primary School and Nursery, which incorporates a 3-storey Victorian school building, is located immediately to the south of the site. The western edge of the site along Raynham Road leads to Fore Street, the neighbourhood's main commercial and social artery and district centre. Directly to the west of the application boundary is the Angel Community Centre, a 1960s two storey building, situated opposite a terrace of two storey pitched roof early 20th century houses and adjacent to a public car parking area.

## 5. Proposal

- 5.1. The application is for the demolition of Beck House and garages on Upton Road and construction of 134 residential dwellings (Use Class C3) and up to 188 sqm flexible commercial floorspace (Use Class E) comprising buildings up to 7 storeys in height, and the change of use of ancillary garages to part of the lower ground floor of Scott House (Use Class C3) to provide up to 70 sqm community hall (Use Class F2(b)), 45 sqm ancillary management office (Use Class C3), podium deck, along with associated means of access and highways works; car and cycle parking; hard and soft landscaping; play space and public, communal, and private realm; refuse storage; ancillary plant and structures; and works to Scott House to create new access at lower ground and ground floor levels.
- 5.2. As stated above, the subject proposal includes the demolition of Beck House, however, due to ongoing issues of anti-social behaviour and related concerns raised by neighbours, the applicant has taken steps to separately and concurrently pursue an application for prior approval for the demolition of Beck House under Schedule 2, part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015. It has been determined that a prior approval is not required and Beck House could be demolished under permitted development rights. As represented in the description of development, this application presently includes the demolition of Beck House as part of the

proposal. The applicant could implement the demolition pursuant to the determination of prior approval or this full planning application, if approved.

- 5.3. It should be noted also that the unused garages to the east of Beck House were demolished by the Council during the course of this planning application.
- 5.4. New residential blocks are proposed to form a courtyard arrangement on the location of the existing Beck House, surface parking and grass areas in the eastern portion of the site. Additional blocks will infill the northern boundary of the site parallel to the North Circular Road, and an additional t-shaped building will be constructed on an existing grassed area to the west of Scott House. In total, the application proposes 134 new homes and increases density from 102.8 dwellings per hectare (dph) to 164.3 dph. Scott House, the existing 18-story residential building in the centre of the Application Site is retained.
- 5.5. The proposal includes the provision of 134 new homes at the Application Site. Of the 134 units, 92 homes, or 69% of units, are proposed to be affordable and delivered on-site. This comprises 27 shared ownership homes and 65 London Affordable Rent homes. 40% of new homes are proposed to be family-sized, 3- and 4-bedroom units.
- 5.6. The existing 168 sqm of commercial floorspace comprising two units on the ground floor of Beck House will be reprovided with 188sqm of Use Class E commercial floorspace in blocks E1 and E2 to look onto the new public square on the eastern side of Scott House.
- 5.7. The existing lower ground floor of Scott House, which contains unused parking, will be converted to up to 70sqm of community hall space (Use Class F2(b)) and 45sqm for an ancillary management office (Use Class C3). The principal entrance to Scott House will be relocated from the ramped entrance on the upper ground floor to an entrance on the lower ground floor, accessible by a sculptural set of stairs, integrating landscaping and play features.
- 5.8. The proposed blocks predominantly range in height between two and five storeys, with one block E1 up to six storeys and G1 up to seven storeys, both along the North Circular Road and nearest the 18-storey Scott House. Heights are arranged to step down from the centre of the site to the east and west, and to the south, in reflection of adjacent heights.
- 5.9. The development will deliver 7,450 sqm of open space to include 1,139 sqm of play space. The existing open space amenity is improved with new trees, soft planting, furniture, play features, suitable surfacing in to the open spaces, paths and areas of public realm. The application includes biodiversity enhancements and urban drainage measures that are integrated into the landscaping.
- 5.10. Poor existing pedestrian conditions are to be improved by regularising the path through the site to one, more legible route that will serve as pedestrian, bicycle and controlled service access. The scheme proposals to incorporate an east-west green link through the site, connecting Upton Road and Raynham Road, and contributing to a strategic cycle connection between Silver Street and Meridian Water rail stations. Cycle parking will be provided in line with regulations.
- 5.11. The new housing is proposed to be car-free, which will be reinforced by a S106 contribution towards consultation for a Controlled Parking Zone. Vehicular

access to the site is not proposed to be altered significantly from the current condition. No vehicular through-access is permitted, except for service vehicles, and driving up to the site is possible via Raynham Road, Upton Road and Woolmer Road.

- 5.12. The site is proposed to minimise of greenhouse gas emissions through several measures, including connection to Enfield's District Heat Network.

## 6. Relevant Planning Decisions

Application Description	Reference	Status
<i>Scott House</i>		
Installation of 10 x bin enclosures (metroSTOR) over the existing concrete slab to lower ground parking level.	21/00385/RE4	Approved 27.07.21
Installation of external cladding, insulation and rendered finish to all elevations.	P12-03169PLA	Approved 13.03.13
Replacement windows to elevations of block.	P12-02505PLA	Approved 11.03.13
Non material amendment to approval under ref:P12-02505PLA to allow replacement windows to elevations of block at Scott House, Woolmer Road N18 2JH.	P13-00628NMA	Approved 22.05.13
<i>Beck House</i>		
Installation of a 5G telecom's H3G Phase 8, 20m high monopole with cabinets at base and associated works.	21/02954/PAT	Refused 22.09.21
Replacement windows to block.	P12-02506PLA	Approved 11.03.13
Change of use of ground floor to hot food takeaway (A3).	TP/00/1620	Approved 12.01.01
Replacement of all windows.	LDC/00/0218	Approved 07.09.00
<i>North Circular Road</i>		
Internally illuminated poster panel.	AD/01/0115	Refused upon Appeal 15.10.01

Prior approval for demolition of Beck House 22/00320/PADE Prior approval not required 24.02.22

## 7. Consultations

### *Pre-Application Consultation*

- 7.1. The pre-application consultation was carried out in September and October 2021, before the application was submitted in November 2021. The consultation comprised two consultation events at the Angel Community Centre on the 16<sup>th</sup> and 17<sup>th</sup> September, an online public exhibition on the 20<sup>th</sup> September and an online engagement that ran from 17<sup>th</sup> September to 12<sup>th</sup> October. 280 newsletters and feedback forms were distributed to local residents and the wider community in September 2021. The applicant team also met with REACT on 26 October.
- 7.2. The in-person consultation events generated 21 responses and the online survey resulted in 607 people who voted, 3670 questions answered, 137 unique feedback emails received and 220 pieces of written feedback. The submitted Statement of Community Involvement describes the response as conveying significant level of support for the proposal, in particular for the demolition of Beck House which people see as attracting much of the antisocial behaviour and crime in the area. Respondents also highlighted support for renewal of the wider area, affordable housing and the newly landscaped spaces. Concerns were raised about infrastructure impact of the new homes, parking, construction, air quality, and anti-social behaviour.

*Enfield Place and Design Quality Panel (DRP):*

7.3. The proposed development was brought to the Enfield Place and Design Quality Panel (hereby referred to as DRP) 10 June 2021. A summary of the conclusions made, along with officer comment as to the degree to which the applicant has addressed DRP conclusions is outlined below:

- “The panel commends the integration of the landscape and architectural teams which appears to be creating a more cohesive proposal.”
- “Landscape proposals successfully pick up on the strategic connectivity and green / blue infrastructure objectives in the wider area. However, there is a lack of detail in how these are translated into the detailed proposals throughout the site.”

Officer comment: The applicant has developed a comprehensive and detailed blue and green landscape strategy. The landscape approach is underpinned by a strategic connection between Raynham Road from the west and Upton Road and Woolmer Road to the east and south. The strengthening of this route through the site better integrates it into the surrounding street network and reinforces connections east to Meridian Water and west to Fore Street – integrating the emerging ambition for a sustainable Green Loop through the site. The route is only for pedestrians and cyclists. The Landscape Plan and Planting Plan demonstrate a connection that is planted with trees and soft planting, as well as drainage features incorporated into the landscaping, such as rain gardens and bioswales. The site plan includes several areas of purposeful open space and play space. Officers are satisfied that the proposal addresses the strategic objectives in the detailed design of the site.

- “The sunken landscaped square at Scott House is a positive feature”
- “Generally, the architectural and landscape proposals to the north circular are underdeveloped. The panel encourage the design team to explore landscape and built solutions which avoid this being a monolithic development that turns away from the north circular.”

Officer comment: A great deal of attention has been paid by design officers and the applicant’s design team to animating the elevations fronting the North Circular Road to ensure that the buildings are perceived as a high quality and dynamic element along this major road. Roofs have been angled and varied in height, facades have been set back and articulated, windows have been designed with sufficient reveal depths and a language of brick detailing is used to add texture to planes. Through the combined use of all of these methods, officers are satisfied that the feeling of a ‘monolithic’ front along the North Circular is avoided.

- “The scheme is proposing a large number of dual aspect through units which is supported by the panel. The dual aspect single bedroom flats overlooking the eastern courtyard are working well.”
- “The eight storey block across from Scott House and fronting the square seems underdeveloped compared to the other parts of the site. This proposal is creating overshadowing issues to the corner flats adjacent to it in northern block.

Officer comment: The building facing Scott House has been reduced in height from eight storeys to five storeys and distributed the massing to address overshadowing.

- “More work is needed on the western courtyard blocks. There are issues with privacy, access, the relationship to the school and an underused strip of land which has not been allocated to public or private use.”

Officer comment: The massing has been revised to correspond more effectively to the school, reducing it in height from 4 to 3 storeys at the boundary. The buffer strip has been removed from the scheme. This has been replaced with split level homes on the ground floor which have access to the new landscaped podium. The block has been redesigned to include more flatted homes (instead of three-storey homes as presented a DRP). This has resulted in fewer homes at ground floor and has rationalised access via a central core and decks.

- “The access to the eastern courtyard should not be mediated solely using fencing and gates. The panel ask the design team to explore options where arches or other architectural features integral to the building are used as the security line. There is a concern that the development could be perceived as a gated community.”

Officer comment: The design of the entrances to the eastern courtyard does include arches through each of the access points. The gate line has been recessed into the courtyard so the gates do not dominate the entrance points on Upton Road and are more subtle. As is further explained in sections below, it is proposed that the gates will be open during daytime hours and closed at night.

### *Public Consultation*

- 7.4. Public consultation as a result of this planning application involved notification letters being sent to 462 neighbouring properties (both within the estate and homes adjoining) 14 December 2021, a press advert in the Enfield Independent was published 22 December 2021 and 5 site notices were erected 15 December 2021.
- 7.5. As a result of public consultation, one representation was received, and a summary of reasons for comment is below:
- General dislike of proposal
  - Concern about the ability of the Scott House structure to withstand works to lower floors.
- 7.6. Officer response: The above concern is a Building Control matter rather than a matter subject to review as part of the current planning application. It is worth noting, however, that technical surveys of Scott House will be required to be carried out prior to works. The structural works at Scott House that are required to effectuate this proposal are limited to small changes to localised door openings. No major structural work at Scott House is necessary.

### *Statutory and Non-Statutory Consultees*

- 7.7. Education: No comment notwithstanding the applicant and the LBE Education have agreed, as outlined, that the applicant will make a financial contribution (of

the amount of £339,690) toward education to be secured within the shadow S106 Agreement.

- 7.8. Environmental Health: Environmental Health does not object to the application for planning permission and finds there is no significant adverse impact that cannot be addressed through mitigation measures that have been conditioned.

Construction dust is likely to be an issue for existing residents and the air quality assessment puts forward suitable measures to control dust; these measures must be implemented to control dust during construction and demolition.

A series of conditions related to emission standards for all Non-Road Mobile Machinery (NRMM), contamination and acoustics associated with the mechanical plant are recommended and these are included in the list of conditions set out above.

- 7.9. Traffic and Transportation: Overall, the proposed approach to traffic and transportation matters is acceptable, particularly the range of mitigation measures proposed, and meets relevant policy requirements. A series of conditions is recommended to address management of access through Raynham Road by Traffic Management Order, lighting, secure cycle storage and a Construction Logistics Plan. All matters will be addressed either through the conditions listed above or within the Shadow S106 Agreement.

- 7.10. Transport for London: TfL is generally supportive of the proposal with the inclusion of conditions that address long-stay cycle storage, the requirement for a detailed Construction Logistics Plan, full cycle parking, a detailed Travel Plan and an Arboricultural Method Statement as trees are proposed on TfL land. All matters raised will be addressed through the conditions listed above or within the shadow S106 Agreement.

- 7.11. SuDS Highways: The officers raised fundamental questions with respect to the Flood Risk Assessment and flood model used and, during the course of application review, have been given sufficient clarification to support the flood mitigation with condition. Officers are generally supportive of the SuDS approach but there are residual matters that can be addressed through conditions, which are included in the list set out above. The full position is set out within the relevant section of this report.

- 7.12. Environment Agency: Following initial consultation, the Environment Agency raised an objection to the application because, according to the EA's records, this application may involve works within 8 metres of a culverted watercourse. The applicant has since submitted evidence in the form of sewer records indicating that the development is outside of the 8-metre range and the EA have confirmed they have withdrawn this element of their objection. The EA additionally requested to review the applicant's flood model to assess flooding risk. The applicant provided the information and received acknowledgement from the EA that the flood model used is the most recent model recognised by the EA. Notwithstanding this, the EA has not yet formally responded to the subsequent submission of information and has not removed this objection. A response is expected imminently and Members will be updated at the meeting. This report resolves to grant approval, subject to no objection from the EA.

- 7.13. Health authority: the NHS London Healthy Urban Development Unit does not object to the proposal subject to a financial contribution (of the amount of £74,920) toward primary healthcare to be secured within the S106 Agreement.
- 7.14. Historic England (GLAAS): Advise that the site lies in an area of archaeological interest and that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. Accordingly, A two-stage condition is advised, firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
- 7.15. Natural England: On receipt of a Habitats Regulations Assessment, to understand the development's impacts on the Epping Forest Special Area of Conservation (SAC), Natural England have confirmed no objection to the development concluding the identified impacts on SAC and Lee Valley SPA and Ramsar can be appropriately mitigated with measures secured via planning obligation. The shadow S106 will secure these measures.
- 7.16. Metropolitan Police (Secured by Design): The Metropolitan Police Service Designing out Crime Unit supports the proposal subject to appropriate conditions and informatives. Conditions are included in the list above.
- 7.17. Thames Water: On the basis of information provided, Thames Water would advise that with regard to surface water network infrastructure capacity/foul water sewerage network infrastructure capacity, they would not have any objection to the planning application subject to a series of appropriate conditions/informatives. Conditions as recommended are included in the list above.

## **8. Relevant Policy**

### *National Planning Policy Framework 2021*

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



- 8.2. 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.
- 8.3. 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.
- 8.4. 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.
- 8.5. 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); 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.
- 8.6. 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 73); 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.”
- 8.7. 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.

- 8.8. 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.
- 8.9. 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.
- 8.10. In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the “presumption in favour of sustainable development” category.
- 8.11. 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.
- 8.12. The London Plan 2021
- |     |  |
|-----|--|
| GG1 | Building Strong and Inclusive Communities                |
| GG2 | Making the Best Use of Land                              |
| GG3 | Creating a Healthy City                                  |
| GG4 | Delivering the Homes Londoners Need                      |
| GG6 | Increasing efficiency and resilience                     |
| SD1 | Opportunity Areas  |
| D1  | London’s form, character and capacity for growth         |
| D2  | Infrastructure Requirements for Sustainable Densities    |
| 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
D9	Tall Buildings
D11	Safety, Security and Resilience to Emergency
D12	Fire Safety
D14	Noise
E11	Skills and Opportunities for All
H1	Increasing Housing Supply (*):
H4	Delivering Affordable Housing
H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H10	Housing Size Mix
S1	Developing London's social infrastructure
S3	Education and childcare facilities
S4	Play and Informal Recreation
HC1	Heritage Conservation and Growth
G1	Green Infrastructure
G4	Open Space
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodland
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI4	Managing Heat Risk
SI5	Water Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy
SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
SI17	Protecting and enhancing London's waterways
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
DF1	Delivery of the Plan and Planning Obligations

### 8.13. Mayoral Supplementary Guidance

- 8.14. Play and Informal Recreation (September 2012)  
Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.
- 8.15. Sustainable Design and Construction (April 2014)  
The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.
- 8.16. The Control of Dust and Emissions during Construction and Demolition (July 2014) The aim of this supplementary planning guidance (SPG) is to reduce

emissions of dust, PM10 and PM2.5 from construction and demolition activities in London.

- 8.17. Accessible London: Achieving an Inclusive Environment (October 2014)  
The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.
- 8.18. Housing (March 2016)  
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.
- 8.19. Affordable Housing and Viability (August 2017)  
Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.
- 8.20. Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration  
Sets out the Mayor's policies for Estate Regeneration.

8.21. Local Plan – Core Strategy

Core Policy 3	Affordable Housing
Core Policy 4	Housing quality
Core Policy 5	Housing types
Core Policy 9	Supporting Community Cohesion
Core Policy16	Taking part in economic success and improving skills
Core Policy 20	Sustainable Energy use and energy infrastructure
Core Policy 21	Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 22	Delivering sustainable waste management
Core Policy 24	The road network
Core Policy 25	Pedestrians and cyclists
Core Policy 26	Public Transport
Core Policy 28	Managing flood risk through development
Core Policy 29	Flood Management Infrastructure
Core Policy 30	Maintaining and improving the quality of the built and open environment
Core Policy 31	Built and landscape heritage
Core Policy 32	Pollution
Core Policy 34	Parks, Playing Fields and Other Open Spaces
Core Policy 36	Biodiversity
Core Policy 39	Edmonton

8.22. Local Plan – Development Management Document

- DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More
- DMD3: Providing a Mix of Different Sized Homes
- DMD6: Residential Character
- DMD8: General Standards for New Residential Development
- DMD9: Amenity Space
- DMD10: Distancing
- DMD37: Achieving High Quality and Design-Led Development
- DMD38: Design Process
- DMD43: Tall Buildings
- DMD44: Conserving and Enhancing Heritage Assets

DMD45: Parking Standards and Layout  
 DMD47: New Road, Access and Servicing  
 DMD48: Transport Assessments  
 DMD49: Sustainable Design and Construction Statements  
 DMD50: Environmental Assessments Method  
 DMD51: Energy Efficiency Standards  
 DMD52: Decentralized energy networks  
 DMD53: Low and Zero Carbon Technology  
 DMD55: Use of Roofspace/ Vertical Surfaces  
 DMD56: Heating and Cooling  
 DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement  
 DMD58: Water Efficiency  
 DMD59: Avoiding and Reducing Flood Risk  
 DND60: Assessing Flood Risk  
 DMD61: Managing surface water  
 DMD62: Flood Control and Mitigation Measures  
 DMD64: Pollution Control and Assessment  
 DMD65: Air Quality  
 DMD68: Noise  
 DMD69: Light Pollution  
 DMD70: Water Quality  
 DMD71: Protection and Enhancement of Open Space  
 DMD72: Open Space Provision  
 DMD73: Child Play Space  
 DMD78: Nature conservation  
 DMD79: Ecological Enhancements  
 DMD80: Trees on development sites  
 DMD81: Landscaping

### 8.23. Other Material Considerations

Enfield Climate Action Plan (2020)  
 Enfield Housing and Growth Strategy (2020)  
 Enfield Intermediate Housing Policy (2020)  
 Enfield Biodiversity Action Plan  
 Enfield Characterisation Study (2011)  
 Enfield Local Heritage List (May 2018)  
 Enfield S106 SPD (2016)  
 Enfield Decentralised Energy Network Technical Specification SPD (2015)  
 Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)  
 The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)  
 London Councils: Air Quality and Planning Guidance (2007)  
 TfL London Cycle Design Standards (2014)  
 GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)  
 GLA: Shaping Neighbourhoods: Character and Context SPG (2014)  
 GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)  
 GLA: London Sustainable Design and Construction SPG (2014)  
 GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)  
 GLA: Social Infrastructure SPG (2015)  
 GLA: Housing SPG (2016)  
 GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)  
 Mayor's Transport Strategy (2018)

GLA Threshold Approach to Affordable Housing on Public Land (2018)  
Healthy Streets for London (2017)  
Manual for Streets 1 & 2, Inclusive Mobility (2005)  
National Planning Practice Guidance  
National Design Guide (2019)

8.24. Enfield Draft New Local Plan and Draft Proposals Map

8.25. The Council consulted on Enfield Towards a New Local Plan 2036 “Issues and Options” (Regulation 18) (December 2018) in 2018/19. This document represented a direction of travel and the draft policies within it will be shaped through feedback from key stakeholders. As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough’s needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.

8.26. As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight, but at this stage it has relatively little weight in the decision-making process.

8.27. 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 DE6 – Tall buildings  
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

## ANALYSIS

### 9. Main Planning Issues

9.1. The main planning issues raised by the Proposed Development are:

- Principle of Development
- Housing Need and Delivery
- Design
- Residential Quality and Amenity
- Open Space, Play Space, Landscaping and Trees
- Biodiversity and Ecology
- Heritage and Archaeology
- Transport, Access and Parking
- Sustainability and Climate Change
- Environmental Health
- Flood Risk and Drainage
- Community Infrastructure Levy and S106

### 10. Principle of Development

- 10.1. 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 affordable 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)<sup>2</sup> 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.
- 10.2. The Council's Local Plan Issues & Options (Regulation 18) document (2021) acknowledges the sheer scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough.
- 10.3. 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. London Plan Policy H1 highlights the urgency to optimise housing provision on brownfield sites, specifically identifying opportunity for housing intensification and development on publicly owned sites. The Application Site constitutes previously developed land and therefore the principle of developing the site for housing to support the Borough's housing delivery target is supported.
- 10.4. The proposal accords with London Plan Policy GG2, which advocates making the best use of land and building to suitable densities on well-connected sites. The proposal seeks to extend the provision of housing by making more efficient use of land and providing a high quality of homes where the existing building no longer presents an optimal housing offer. In this respect, the aim to strengthen the provision of housing on a site that is already residential, and is within a residential setting, is justified.

- 10.5. The emerging Local Plan includes the Application Site within the Angel Edmonton Urban Placemaking Area, led by draft Strategic Policy SP PL4: Angel Edmonton, which sets out the aspirations for the area, including an offer of a range of housing typologies and the potential for denser forms of residential growth. Additional objectives include improved connectivity, drainage enhancements and a more suitable environment along the North Circular Road. The Application Site forms the majority of draft Site Allocation 17 in the draft Policies Map, which is in consultation alongside the draft Local Plan. The draft Site Allocation estimates a housing capacity of 198 homes for the entire Site Allocation; the timeframe for delivery is in five to ten years. Although limited in weight, the draft allocation supports the principle of increased residential provision at this site – and the 134 units proposed as part of this application appear proportionate to the area of the Site Allocation that the Application Site comprises.
- 10.6. The Core Strategy (Core Policy 3) and DMD (Policy DMD1) seek a borough-wide target of 40% affordable housing in new developments, applicable on sites capable of accommodating ten or more dwellings.
- 10.7. London Plan Policy H4 outlines the strategic target of 50% of all new homes delivered across London to be genuinely affordable and outlines specific measures to aid achieving this aim. Policy H2 of the New Enfield Local Plan, whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on development sites and that the Council will set a strategic target of 50% of new housing to be affordable.
- 10.8. The proposed development will provide 134 new homes. Of these, 92 are proposed to be affordable, representing 69% of all new housing units, exceeding the London Plan 50% target. As part of the affordable housing offer, 65 (71%) homes are proposed to be London Affordable Rent and 27 (29%) are proposed as shared ownership. 42 homes will be private sale. The proposed development therefore supports LBE's ambition to build a range of affordable homes to support Enfield residents currently in need as well as those seeking access to the property market.

#### *Commercial floorspace*

- 10.9. The application additionally proposes commercial and community facility floorspace.
- 10.10. Policy DMD 25 sets out the policy requirements for locations for new retail leisure and office developments. The policy directs development of shopping facilities to local centres and parades as designed within the Policies Map. Shops outside these centres should be within 300 metres from a primary shopping area only where no appropriate sites are available in the centre.
- 10.11. There are presently two commercial units within the Application Site totalling 168 sqm: a convenience shop and hot food take-away, both on the ground floor of Beck House.
- 10.12. The application proposes three Use Class E spaces fronting the new central square, totalling 188 sqm. The total amount of commercial floorspace on the site is proposed to increase by 20 sqm – relative to the increase in residential floorspace, this uplift is modest. In essence, the proposal reinstates the existing



commercial provision, which has a particular and established function on the Application Site. Given the commercial units are within 300 metres of Fore Street, the proposal for commercial floorspace is supported.

- 10.13. It should be highlighted that the permission will enable Use Class E uses, which include shops, food and drink establishments (excluding hot food takeaway), services, indoor sports, medical services, creche or nursery and offices. These uses, although within the same use group, vary in nature and character. Certain uses, such as cafes or restaurants, may result in impacts to adjacent residents. For this reason, conditions are recommended that no external equipment may be affixed to the building without consent and commercial hours are limited to between 8:00 am and 11:00 pm. A condition should also restrict the conversion of Class E to residential use.
- 10.14. The application does not make clear what sub-uses within Use Class E are intended for the commercial spaces. As in the transportation section of this report, a condition is recommended to secure a detailed Delivery and Servicing Plan that will include the specific use(s) of the commercial space.

#### *Community floorspace*

- 10.15. The application proposes to convert the existing lower ground floor of Scott House, which presently houses unused parking garages, to a 70sqm community hall (Use Class F2(b)). Policy DMD 16 sets out criteria in relation to the provision of community spaces: demonstration of community need, making effective use of the space with flexibility and opportunity for multiple users, easily accessible, including for physically impaired users, does not impact amenity and does not have traffic impacts. The applicant has addressed concern with respect to sufficient amenity for the space by including a bathroom. The provision of a community hall at this location is accepted.

#### *Principle of development conclusions*

- 10.16. The development has no land-use implications. It proposes an intensification of the established residential (Use Class C3) use on previously developed land that has been identified for additional housing growth. It exceeds LBE's adopted affordable housing target of 40% and the London Plan's target of 50% with an offer of 69% affordable units. Accordingly, the principle of additional housing development on this site is supported.

## **11. Housing Need and Delivery**

### *Housing Need*

- 11.1. The NPPF (Para. 125) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances: .c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF. The London Plan sets a target for the provision of 66,000 new homes across London each year. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.

- 11.2. The London Plan 2021 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 previous target of 798.
- 11.3. The Strategy sets five ambitions, the first of which is 'More genuinely affordable homes for local people'. The ambition sets a priority to maximise housing delivery and use council assets to achieve this. 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.
- 11.4. The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the London Plan seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 11.5. Taking into account the housing needs of Enfield's population, nationally- and regionally-set housing delivery targets and shortfalls in meeting targets, it is evident that this proposal to make more effective use of Council land to provide a greater number of homes, at a high-quality and with a range of housing types is wholly supported by policy.

#### *Affordable Housing*

- 11.6. The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Annex 2 of the Revised NPPF (2021) defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)".
- 11.7. London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable with threshold level of affordable housing on gross residential development at 50% on public sector land where there is no portfolio agreement with the Mayor.
- 11.8. Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on sites capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances. In reflection of London Plan targets and the evidence demonstrating the crucial need for affordable housing, emerging Local Plan Policy H2 aims to secure 50% of all new homes in Enfield as affordable.
- 11.9. According to the Enfield Local Housing Needs Assessment 2020, only households with acute housing need are on the Council's housing register, that is, eligible to be given Council housing. The vast majority of those on the register, or waiting list, live in temporary accommodation. Households who are

not homeless or living in temporary accommodation rely on housing through the private sector and are typically supported by housing benefit. As of 2020, there were 12,300 households supported by housing benefit in the private rented sector within Enfield. The Assessment concluded that there is an annual net shortfall of 711 affordable rented homes. As the Assessment notes, this shortfall underrepresents the numbers of residents who are not in acute housing need but would still qualify housing benefit to afford accommodation.

- 11.10. The proposal includes the provision of 134 new homes at the Application Site. Of the 134 units, 92 homes, or 69% of units, are proposed to be affordable and delivered on-site. This comprises 27 shared ownership homes and 65 London Affordable Rent homes. The London Plan requires that the percentage of affordable housing on a scheme is calculated in habitable rooms to ensure that a range of unit sizes is provided. The proportion of affordable housing in this proposal in habitable rooms also equates to 69%. The delivery of 69% affordable homes, whether measured in units or habitable rooms, across the total housing offer accords with existing and emerging policy and makes the best use of Council land to extend affordable housing provision in Enfield.

#### *Replacement of Affordable Housing*

- 11.11. The proposal includes the demolition of two- to four-storey Beck House. As noted, a separate application for prior approval to demolish Beck House has been submitted by the applicant in order to address urgent safety concerns. It was determined that prior approval is not required and Beck House can be demolished under permitted development rights. Notwithstanding this, the provision of residential accommodation at Beck House is included here for completeness. Beck House was constructed in 1965 as one of two buildings (the other being Scott House) constructed on the then Angel Estate. It was built as council housing and has since functioned as a residential building. In recent years, Beck House has been impacted by recurrent instances of anti-social behaviour and crime. Sections of the building, particularly the western section, are in a state of substantial disrepair. The decision was taken by the Council to replace the building with a greater number of new, well-designed and well-built homes while also making more efficient use of the site in its entirety.
- 11.12. Policy H8 of the London Plan expects that the loss of existing housing is replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Any demolition of affordable housing must be replaced by an equivalent amount of affordable floorspace. Where there is a loss of vacant social rent housing, it may be provided as either social rent or London Affordable Rent. The affordable units must also be integrated into the development and among other tenures.
- 11.13. Similarly, Enfield Policy DMD 4 prohibits the loss of any housing that can still be used unless there is a net increase in residential floorspace as part of the development. Affordable housing loss is only acceptable where it is part of managed replacement of housing and the development achieves a more appropriate mix of housing types and tenures and/or there is no net loss of habitable rooms. In all cases, the resulting development must be of a higher quality and design standard, and improve the wider environment.
- 11.14. The recent residential history of Beck House is described in two parts: the eastern section of the building and the western section of the building.

Eastern Beck House

- 11.15. The eastern part of Beck House comprises 34 bedsit (studio) flats totalling approximately 1,088sqm. (or 1,250 sqm?)
- 11.16. This section was owned and operated by Riverside Housing Association (RHA) as supported housing for single or childless couples ages 18 to 64 with support issues or those at serious risk of becoming homeless. This use ceased in 2016 following the withdrawal of Government funding for the support services.
- 11.17. RHA then operated the 34 units as temporary accommodation on behalf of the Council. The temporary accommodation served as emergency housing for vulnerable individuals/couples and those who were at risk of becoming homeless. This use was in place between September 2016 and October 2021. In that period, RHA rehoused approximately half of the residents among its own properties and the remaining residents sourced their own accommodation.
- 11.18. In the spring of 2020, the Government's 'Everyone In' programme led to the re-use of this part of the building for rough sleepers who needed emergency accommodation. During this time, only four households remained from the period of RHA's management, the remaining 30 units were occupied by rough sleepers.
- 11.19. Over 2021, residents were re-housed elsewhere in Enfield through a GLA-funded programme to deliver 73 bedspaces for move-on accommodation for homeless people in the Borough. By October 2021, Beck House was vacant as the last households, including the four households who required supportive housing, had been successfully relocated.
- 11.20. Policy DMD15 sets out the criteria which must be met in order for a loss of specialist housing to be permitted – the floorspace should either be provided elsewhere or it should be demonstrated there is no longer a need for both the use and the tenure.
- 11.21. The temporary housing that was previously provided at Beck House has been newly provided at another location within Enfield and residents who occupied the Beck House temporary housing were rehoused in the new accommodation constructed as part of the GLA-funded initiative. On this basis, it is not considered that there has been a loss of temporary housing as a result of the vacancy and demolition of the eastern section of Beck House to enable the proposed development.

Western Beck House

- 11.22. The western section of Beck House has been Council owned and operated. 12 units are contained in this segment of the building: three leasehold units and nine social rent homes.

**Western Beck House**

	<b>1-beds</b>	<b>2-beds</b>	<b>Floorspace</b>	<b>Hab rooms</b>
<b>Leasehold</b>	2	1	203.2 sqm	8
<b>Social rent</b>	8	1	463.6 sqm	20

- 11.23. The units were vacated between October 2014 and March 2018 as the Council negotiated with leaseholders to buy back their properties and to secure homes for the nine council tenants. The decision was made not to re-let any units until the

future of the building was determined. The three leaseholders, after selling their properties back to the Council, independently relocated. The remaining nine social rent households comprised of secure tenants who had been re-housed in other Council properties also under secure tenancies.

- 11.24. While the nine social rent households were provided housing in other Council accommodation, London Plan Policy H8 and Enfield Policy DMD 4 prohibit the loss of affordable housing floorspace unless it is replaced at existing or higher densities, there is a more appropriate mix of housing types and tenures and the new housing is of a high quality. Nine social rent units are lost at Beck House as part of its demolition, but the replacement development proposes 134 units, 27 of which are shared ownership and 65 are London Affordable Rent. Accounting for the demolition of units, there is a 125-unit overall net increase of homes at the site, and included in this, a net increase of 83 affordable homes. The proportion of affordable units to the overall housing offer is 62%, still above targets of 50%. The London Plan requires that the provision of affordable housing is calculated in habitable rooms. Deducting for the loss of 20 social rent habitable rooms at Beck House, the proposal still yields an affordable proportion of 65% of all habitable rooms.
- 11.25. In sum, although there is a loss of social rent units resulting from the demolition of Beck House, the replacement and uplift of affordable homes is policy compliant and acceptable in planning terms.

#### *Housing Tenures*

- 11.26. London Plan Policy H6 sets out the split of affordable tenures that should be applied in residential development:
- a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
  - a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
  - the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- 11.27. Enfield Core Policy 3 and DMD Policy 1 stipulate a borough-wide affordable housing ratio of 70% social rented and 30% intermediate provision.
- 11.28. The development proposes the following affordable tenure split:

<b>London Affordable Rent</b>	<b>Shared Ownership</b>
65 homes	27 homes
71% of total affordable	29% of total affordable

- 11.29. The application proposal meets tenure requirements, as above. Priority is given to low-cost rented homes to address the acute needs of the Council's housing waiting list. The affordable housing offer, in terms of tenure split, is acceptable.

#### *Dwelling Mix*

- 11.30. London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and that this should have regard to a number of criteria including robust local evidence, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site, amongst other considerations.
- 11.31. Core Policy 5 of the Core Strategy seeks to provide the following borough -wide mix of housing:
- 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).
  - The mix of intermediate housing sizes will be determined on a site by site basis and the appropriate mix must take into account a range of factors, including development viability and the affordability of potential users.
- 11.32. The evidence base to support the unit mix set out in Core Policy 5 dates from 2008. More recently, the Local Housing Needs Assessment 2020 was prepared to support the emerging Local Plan and is the most up-to-date source of evidence. Draft Local Plan Policy H3, outlines priority types for different sized units across different tenures:

	<b>Studio/bedsit</b>	<b>One-bedroom</b>	<b>Two-bedrooms</b>	<b>Three-bedrooms</b>	<b>Four-bedrooms or more</b>
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

- 11.33. The Council's Local Housing Needs Assessment 2020 outlines that 41.1% of new affordable homes should have three bedrooms. This is based on housing register evidence. It also outlines 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.

- 11.34. The applicant proposes the following dwelling mix across the entire housing offer:

	<b>1 bedroom</b>		<b>2 bedroom</b>		<b>3 bedroom</b>		<b>4 bedroom</b>	
Market	14	33%	15	36%	13	31%	0	0
Shared ownership	16	59%	11	41%	0	0	0	0
London Affordable Rent	16	25%	9	14%	32	49%	8	12%
<b>Total</b>	<b>46</b>	<b>34%</b>	<b>35</b>	<b>26%</b>	<b>45</b>	<b>34%</b>	<b>8</b>	<b>6%</b>

- 11.35. Taken as a whole, the proposed dwelling size mix deviates from the adopted policy (Core Policy 5) and the borough-wide evidence of need, providing a larger

proportion of one-bedroom units and fewer 3- and 4-bedroom than the evidence indicates needs to be provided.

- 11.36. Looking at the individual tenures, the market housing component would have to provide a greater number of 3- and 4-bedroom homes, and fewer 1-bedroom and 2-bedroom homes to comply with policy and need.
- 11.37. The London Affordable Rent proposal successfully and beneficially meets the crucially needed 3- and 4-bedroom family-sized homes. The breakdown does skew towards including more 1-bedroom and fewer 2-bedroom homes than needed, although the overall proportion of London Affordable Rent units against the total number of homes is high at 49% of all homes. In assessing the comparable deficit of 2-bedroom units, it should be taken into account that the overall scheme delivers a high proportion of London Affordable Rent housing.
- 11.38. The intermediate shared ownership tenure includes 59% 1-bedroom and 41% 2-bedroom homes. London Plan policy directs the Council to consider the dwelling size mix of intermediate tenures based on market evidence. In this regard, the proposal is appropriate and the balance of unit sizes in the intermediate tenure is accepted.
- 11.39. The London Plan makes allowance for site- and location-specific considerations to allow flexibility in applying housing mix standards, as well as enabling a design-led approach to be taken in the optimisation of a site's capacity.
- 11.40. The Government prescribes a "tilted balance" in favour of housing delivery to the Council's planning decision-making as a result of Enfield's shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. Development on Council land presents a significant opportunity to provide needed housing. Although not in line with recently demonstrated need, the proposed dwelling mix with an increase in one-bedroom homes and a relative gap in 3- and 4-bedroom homes means that more homes are provided overall. Crucially, the delivery of family sized homes that are proposed in this application has been focused in the London Affordable Rent tenure to offer homes to families with the greatest need. 61% of London Affordable Rent homes are 3- and 4-bedroom units. It should be noted again that the emerging Site Allocation 17 in the new Local Plan indicates capacity for 198 homes across the site allocation site. The 134 proposed homes correspond to the segment of the allocation site that the Application Site comprises.
- 11.41. As has been stated, the London Plan promotes the best use of land and intensification of sites, especially where they are well connected by transport infrastructure. The Application Site is 500 metres from the Silver Street Overground station and 300 metres from Fore Street, the Angel Edmonton town centre. The site has a PTAL rating of 5. Given the site's strong connectivity, there is a valid planning rationale for increasing the density of the site and providing a higher level of smaller (one-bedroom) units that can benefit from the convenient location and suitable local amenity. Rearranging the residential floorspace would involve a large loss of one-bedroom units to provide a relatively small number of additional 3- or 4-bedroom units, and overall harmful impacts to the layouts of other homes.

- 11.42. The configuration, shape and boundaries of the site present challenges to designing a site plan that achieves a high level of amenity for residents. The proposal has mitigated the noise and outlook impacts arising from its long northern border with the North Circular Road by ensuring units are dual aspect and private rooms face south. The long and narrow shape of the site creates challenges for arranging homes efficiently and providing the open space and amenity needed particularly by family households. The provision of family homes has been maximised through the use of terraces, maisonettes and homes with ground floor access – the inclusion of more family-sized units would mean a compromise to the amenity of these units, as well as impacts on the quality and configuration of smaller homes.
- 11.43. Given the evidenced need for new housing, the high proportion of family-sized units proposed within the London Affordable Rent offer, the accessible location of the site and the efficiency of site layout, it is considered that the collective benefits of the proposal outweigh the divergence of the dwelling size mix from policy.

## 12. Design

### *High-quality design*

- 12.1. Paragraph 126 of the NPPF underscores the central value of good design to sustainable development. The Framework expects the planning process to facilitate “high quality, beautiful and sustainable buildings and places”. As in Paragraph 130, the assessment of a scheme should take into account the endurance of the design, visual appeal, sensitivity to local context, sense of place, optimisation of the site and contribution to health and wellbeing.
- 12.2. London Plan Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged.
- 12.3. Enfield Policy DMD 37 sets out objectives for achieving good urban design: character; continuity and enclosure; quality of public realm; ease of movement; legibility; adaptability and durability; and diversity.
- 12.4. The overall design approach to making better use of the Application Site has been well rationalised and is generally supported. Scott House remains the central and most dominant element of the site plan. The reorganisation of the site takes advantage of the opportunity to improve Scott House’s access, emphasise the point of intersection on the eastern side of Scott House to provide a central square and improve connectivity, position buildings effectively along the length of the North Circular Road and Upton Road, repurpose the existing blank areas of turf with suitably massed buildings and functional landscaping, and graduate heights away from Scott House towards the existing low-rise residential stock and Raynham Primary School. The site plan provides good amenity to existing and new residents, both within and adjacent to the Application Site.
- 12.5. Aspects of the design proposal are further assessed below. The title block site plan with building names is provided for ease of reference.





### *Density*

- 12.6. The 2021 London Plan has amended the policy approach to assessing density. Whereas previous policy set out ranges of appropriate density based on location and site access, the current Policy D3 emphasises the importance of a design-led approach to optimise site capacity, including site allocations. This removes the standardisation of density calculations with a more site-specific evaluation.
- 12.7. Adopted Core Policy 5 states that density should balance the need to make the most efficient use of land, account for accessibility to transport and respect existing character. DMD Policy 6 is also guided by the London Plan density matrix (which has now been superseded by current London Plan Policy D3, as above), wanting to ensure scale and form are appropriate, the development is of a high quality and regard is given to housing mix targets.
- 12.8. The impact of density is closely tied to user amenity – especially, in this application, the quality of residential accommodation. Quality and amenity are discussed in following sections.
- 12.9. The application proposes an overall increase in density from 102.8 (Scott House plus existing Beck House) dwellings per hectare (dph) to 164.3 dph. In light of the Application Site's strong PTAL rating of 5, convenient proximity to Fore Street and Silver Street Overground station, the proposed scale and heights of new buildings having regard to neighbouring buildings, and support from policy to maximise delivery of housing in Enfield, the proposed resulting density is appropriate at this location.

### *Massing and height*

- 12.10. London Plan Policy D9 outlines that Development Plans should define what is considered a tall building for specific localities, the height of which will vary but should not be less than 6 storeys (or 18 metres).
- 12.11. Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of "tall buildings" are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria). Although not adopted as policy and having limited weight, the Application Site is identified within Figure 7.4, further indicating that the subject stretch of the North Circular Road is appropriate for tall buildings up to 33 metres in height.

- 12.12. The site plan arranges height relative to Scott House and existing buildings that comprise the site's context. In general, the buildings nearest Scott House and the North Circular Road are the tallest and then step down to the east, west and south, with the lowest-rise buildings along the Upton Road frontage. Increasing the scale of development around Scott House frames this central and 'marker' building. Block E2, nearest Scott House and the central square of the site plan, rises to 37.84 metres (7 storeys) in height. Adjacent Block G1 to the east steps down to 31.87 metres, and G2 rises to 30.5 metres (both 4-5 storeys). On the western side of Scott House, along the North Circular Road, Block A2 is 35.07 metres (6 storeys) at its tallest point. Block A1 is 30.91 metres tall (4-5 storeys) and Block D, nearest the primary school, is 30.9 metres (3-5 storeys) high.
- 12.13. The general composition of height is justified. The context of the North Circular Road presents an opportunity for taller buildings because of the larger distances between buildings, longer sightlines of the site. The scale and height of buildings lowers towards the lower rise context to the south and does not overshadow as it is sited to the north. Block D benefits from stepped massing and setbacks from the boundary giving sufficient distance to the school and caretaker's house. The terraced homes on Upton Road are of a human scale and mediate between the new phases, existing towers and the street.

#### *Architecture and materials*

- 12.14. The overall architecture of the proposal presents a restrained contextual approach with considered brick work, careful articulation and fine detailing. The delivery of the detail will enhance the urban form of Edmonton and provide an appropriate transition between the North Circular Road and adjacent terraced and semi-detached housing.
- 12.15. The architecture of the buildings relies on the rhythm of fenestration, brick detailing, quality and colour to provide variety. This simplicity is a strength but without the right selection of final materials and high-quality execution, the elegant character of the design will be lost and the simplicity is at risk of becoming bland. On this basis, officers recommend a condition requiring the submission of all external materials for review.
- 12.16. The angled form of the roofs and articulation of buildings helps to create a characterful and distinct form. The set-backs and undulation in plan and section help to reduce the perception of a "wall" being created, particularly along the North Circular Road. The detailing and variety in the building form as captured in the application drawings help to mitigate the "monolithic" effect.
- 12.17. Overall the window opening details appear to be of an appropriate quality with sufficient reveal depths shown (approx. one standard brick) to provide depth and variety in the elevations. The concrete lintels and banding successfully add variety to the North Circular elevation.
- 12.18. The numerous brick details (sawtooth, ribbed/corduoy) are vital in successfully breaking up the elevations and providing visual interest and perception of scale. These features also help to define the buildings (the energy centre, maisonettes) and simultaneously unify the composition of buildings as one coherent development.

- 12.19. To ensure buildings are constructed in accordance with the details set out in the planning submission, the applicant has included plans, sections, elevations and detail drawings to ensure these elements are captured in the planning decision. A condition is included to comply with the approved drawings.
- 12.20. As per London Plan Policy D4, officers recommend a S106 Clause ensuring continuous involvement by a high-quality architect, in this instance, the scheme architects, Levitt Bernstein.

### **13. Residential quality and amenity**

- 13.1. London Plan Policy D6 sets out numerous standards and parameters to ensure housing is of the highest quality. The policy stipulates room sizes, aspects, daylight and sunlight standards and outdoor amenity space as well as other criteria. Similarly, Enfield Policy DMD 8 includes criteria that new residential development must meet.

#### *Aspects*

- 13.2. Policy D6 of the London Plan gives strong precedence to the development of dual aspect dwellings; single aspect dwellings are only acceptable where it is a better design solution to optimise site capacity, and will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 13.3. For the purposes of dwelling orientation, ventilation, daylight and outlook, the site location and configuration present several impediments, including a long, north-facing frontage along the North Circular Road, which raises noise, air and outlook challenges. The site is narrow, therefore, the location of windows needs to factor privacy, distance and overlooking.
- 13.4. In sum, 85% of the 134 new homes are dual or triple aspect. A further 12 units, or 9% of total homes, have been classified by urban design officers as being “enhanced single aspect”, meaning, they are dual aspect but of a lesser quality with fewer passive benefits than most dual aspect homes. The remaining 6%, or 8 units, are all 1-bedroom/2-person dwellings with one aspect.
- 13.5. Where the development proposes single aspect units and there is no alternative design solution to improve them to two aspects, the Housing SPG provides a set of criteria the single-aspect dwellings must meet, including natural ventilation, privacy, daylight and a shallow plan. A close review of each of the single aspect homes reveals that these requirements are generally met. The three units in the northeast corner of Block I, overlooking the North Circular Road, present the greatest challenge in overcoming the constraints of being single aspect. Following consultation with the applicant and architects, it is understood and accepted that a lack of passive ventilation and poor outlook is being mitigated through Mechanical Ventilation and Heat Recovery and an east-facing winter garden. For all other units, the proposed aspects are acceptable.

#### *Space Standards*

- 13.6. All units either meet or exceed internal floorspace standards required by London Plan Policy D6, Table 3.1. The Planning Statement confirms that all 134 units would meet Nationally Described Space Standards and private amenity space will be provided to all units in the form of balconies and/or private gardens.

*Daylight and sunlight*

- 13.7. The Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice (2011)' sets out the tests used to assess daylight and sunlight impacts of development on neighbours, future occupiers of the development and adjacent open spaces. The applicant submitted a Daylight & Sunlight Report (2021) with the results of each of the relevant assessment methods.

Neighbouring properties

- 13.8. The analysis of daylight/sunlight impacts to neighbouring properties has performed using Vertical Sky Component which measures the amount of visible sky available from a point on a vertical plane. The impact is 'adverse' if the resulting value is both less than 27% and less than 0.8 times its former value.
- 13.9. There are several existing properties along Upton Road (including nos. 2, 8, 12, 14, 22, 24, 28, 38 and 42) each with one window to either a front room or bedroom that will experience a reduction in VSC of between 0.4 and 0.7 times its former value. A reduction of less than 0.8 is considered adverse. In almost all instances, the windows are one oblique facet of a five-faced bay window, and in all instances, already have VSCs well below 27%, so an additional loss of sky is likely to present as being proportionally high. However, as these are multi-faceted bay windows, light is entering rooms from more than one direction. In these instances, the impact to VSC is accepted as the actual impact is minor and unlikely to be significantly perceived. 18 Woolmer Road includes one small flank window that will experience a 0.57 loss, resulting in a VSC of 17.7; this affected space is likely to be a hallway. 58 Raynham Road appears to be a residential property on the Raynham Primary School site and experiences an impact to six windows facing the development, retaining 0.58 to 0.68 of original VSC. However, the resulting VSCs are between 21.3 and 26.2, which is acceptable at an urban location.
- 13.10. Windows on the lowest three floors of the north façade of Scott House will be impacted with reductions generally between 0.4 and 0.65 of existing VSC. The resulting VSCs are not significantly below 27% and, as such, are acceptable.

Future occupiers

- 13.11. Average Daylight Factor (ADF) is a measure of the light within a room – specifically the average indoor illuminance (from daylight) on the working plane within a room. ADF has been used to assess the level of light in the new development. Recommendations are ADF of no less than 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. The Daylight & Sunlight Report demonstrates that the ADF measures are very good; in the large majority of instances, ADF levels exceed standards. In a few instances where ADF levels are slightly below standards, the level of light may be impacted by the inclusion of a balcony, which is a beneficial amenity and in itself affords access to light. In the assessment of Annual Probable Sunlight Hours of living rooms, results indicate all living rooms will achieve acceptable sunlight levels.

Overshadowing

- 13.12. A review of the development's impact to sunlight on adjacent open spaces, both existing and proposed, indicates that most open spaces will generally receive an acceptable amount of sunlight, measured as a minimum of two hours on 21 March.

The greatest deficiency is in the southern half of the eastern courtyard surrounded by Blocks E, G, H and I. The length of the southern half of the courtyard as well as the north facing small rear gardens of properties on Block H will not achieve this minimum. These houses have been provided with terrace space at a higher level that receives a good amount of sunlight. Given the large size of this courtyard space, and that the design has been sensitive to locating low-rise buildings along the southern border on Upton Road, on balance, this amount of overshadowing is accepted.

### *Inclusive Design*

- 13.13. Policy D7 of the London Plan states that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 of the Development Management Document has similar policy objectives.
- 13.14. The proposal achieves requirement that 10% (or 14 of 134 units) meet requirement M4(3) as 'wheelchair user dwellings.' 107 of the 134 units (or 80%) meet M4(2) 'accessible and adaptable dwelling' requirements. M4(2) requirements enable most people to access the dwelling and includes features that make it suitable for a range of potential occupants, including older people, individuals with reduced mobility and some wheelchair users. The remaining 13 units meet M4(1) 'visitable dwellings' requirements, which means the dwelling makes reasonable provision for most people, including wheelchair users, to access and enter the dwelling, and access habitable rooms and sanitary facilities on the entrance level. While the London Plan seeks to ensure that all new units that do not meet M4(3) requirements, meet M4(2) requirements, there are design and flood mitigation constraints that impact several units. 10 of the M4(1) units are within Blocks A1, A2 and G1 parallel to the North Circular Road. Main entrances to these homes is on the southern side of the buildings – due to level changes and raised first finished floor levels to mitigate flood risk, these main entrances are accessed by a step. Each dwelling does have a step-free secondary entrance from the North Circular side. In these instances, given there are two points of access, M4(2) requirements are partially met, but the units are classified M4(1).
- 13.15. Although it is expected that all occupants and visitors share equal provision of access across the development, conflicting requirements and site conditions prevent the M4(1) units from fully complying with M4(2) standards. In view of the partial compliance afforded by a step-free entrance from the North Circular and the need to meet other safety requirements, it is accepted that the 13 units will meet M4(1) requirements, and that the housing is found to be satisfactorily accessible.

### *Fire Safety*

- 13.16. London Plan Policy D 12 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.

- 13.17. This application is submitted with a Fire Safety Statement (November 2021) and RIBA Stage 3 Fire Strategy (November 2021).
- 13.18. Section 3 of the strategy details means of escape inclusive of those with reduced mobility. Section 4 of the strategy outlines means of warning and section 5 outlines details surrounding fire spread control. Access facilities for the fire service and fire safety management and maintenance details are outlined.
- 13.19. The London Fire Brigade were consulted on this application however did not comment. The London Fire Brigade is a non-statutory consultee. The Fire Safety Statement and Fire Strategy were reviewed by Enfield's Building Control officer and specific consideration was given to fire access considerations accounting for locations of dry risers, parking for fire tenders and hose reel distances. Based on standard calculations, officers are satisfied that the fire access requirements will be met. Further required calculations will be completed at detailed design stage and will be subject to scrutiny through the Building Control process and therefore are outside of immediate planning considerations.
- 13.20. It is recommended that planning conditions require compliance with the submitted Fire Strategy in accordance with London Plan Policy D12.

*Secured by Design*

- 13.21. London Plan Policy D11 and Core Policy 9 promote the integration of design measures that create safe and secure environments for the community. This is seen as integral to good design.
- 13.22. The applicant engaged with the Designing Out Crime Office of the Metropolitan Police during the design phase, and Enfield consulted the Met during this application review. The Designing Out Crime Officer provided comments.
- 13.23. The Met highlighted concerns around the particularly high levels of criminal activity in the area and presently on the Application Site. The officer points to Beck House, given its vacant state and construction with open stair core, as attracting unlawful behaviour. The condition requiring Secured by Design Accreditation prior to commencement of above-ground works and certification prior to occupation is recommended; the two-step condition will ensure continued engagement with Designing Out Crime officers through detailed design and construction.
- 13.24. The applicant has already advised general compliance with numerous measures to increase site security, including a compliant public realm lighting plan, secure car park entrances, access control entrances and internal circulation and public realm with clear sight lines.
- 13.25. The applicant incorporated gates into the design of three of the communal private open spaces on the Application Site. Early in the design, the Designing Out Crime Officer identified the elevated podium space to the west of Scott House and the courtyard open space flanked by Block D in the southwestern corner of the site as needing this additional element of security. The configurations and locations of these private open spaces are especially sensitive as there is more limited natural surveillance and greater direct proximity to residential windows than other open spaces within the site plan. Although London Plan Policy D5 supports design that is inclusive with as few separating barriers as possible, it is deemed that these two spaces have limiting circumstances that require gates to

ensure a suitable level of protection and therefore gating in these locations is supported.

- 13.26. The eastern courtyard surrounded by blocks E, G, H, I is a larger open space than the two above-mentioned spaces. In addition to being an outdoor amenity for residents of these blocks, it also provides access to main entrances to blocks fronting the North Circular Road. It has been the design intention to leave access to the courtyard from Upton Road and the central square open, and to encourage a perception of openness. It is acknowledged, however, that the courtyard is a private space and does not provide any beneficial through-route for non-residents. The Designing Out Crime Officer did have reservations about leaving this space completely open. It is therefore recommended that gates be installed and a condition is included that requires closure of the gates during night hours, between 7pm and 6am. This will retain ease of access for residents of blocks overlooking the courtyard while providing an additional level of protection at night.

#### **14. Open Space, Play Space, Landscaping and Trees**

##### *Open Space and landscaping*

- 14.1. London Plan Policy D6 sets out standards for housing quality and requires a provision of private open space to meet the needs of the new and existing occupants of the site and Policy G4 encourages development to provide new areas of open space where possible. The London Play and Informal Recreation SPG sets standards of quantity and quality in the provision of new play spaces. Enfield Policy DMD 71 guards against the loss of open space resulting from development unless the loss can be re-provided or mitigated. Policy DMD 73 further sets out the Council's expectations around the delivery of play spaces. The emerging Local Plan identifies the value of informal, doorstep and play-on-the-way spaces that are integrated into landscape design.
- 14.2. According to the applicant's calculations as presented in the application, 7,450 sqm of open space is proposed as part of the application and there is presently 4,652 sqm of open space on the site. In response to a request for clarification, the applicant corrected this information to share that the existing amount of open space is 8,316 sqm. While the revised amount of existing open space seems more accurate as it is expected the amount of open space would decrease post-development, the approach that has been taken to accounting for open space is not entirely in line with the policy definition. The applicant has included almost all of the space within the site boundary that is not occupied by building footprint, including proposed parking spaces and the ramp entrance to parking beneath the podium. While open space is, as by the adopted definition, "All areas free of development", the definition cites "public landscaped areas, playing fields, parks and play areas, and also including areas of water..." Although a landscape approach is being applied to the entire area in the red line, not all of the area is provided to function as open space, so it is noted that both the existing and proposed areas of open space are over-calculated, but it stands to reason that the total amount of open space is proposed to decrease as a result of more of the site being developed.
- 14.3. As has been discussed, planning policy across all levels supports the central objective of this application to better utilise this Council site for more housing and provide better quality accommodation and amenity all-around. By its nature, the development requires an intensification of the site, which entails a reorganisation of the site plan and infill of underutilised areas. Currently, the Application Site is

underutilised both in its built areas (Beck House and garages) and in its landscape conditions, with large areas of grass, mounds and hardscape for parking, that provide visual relief, but no functional open space or integral landscaping. It should also be noted that the majority of open space on the site is private in that it is not designated open space for general public recreation. Therefore, construction over the open areas does not constitute a loss of designated public open space. Still, policy supports a replacement of lost open space and delivery of play areas.

- 14.4. The application proposes extensive landscape works to improve the green amenity at the site and comprehensively integrate trees, soft planting, furniture, play features, suitable surfacing in to the open spaces, paths and areas of public realm.
- 14.5. Through the process of site planning, five areas of open space have been identified: the green buffer running the length of the border with the North Circular Road, local 'green link' into the site from Rayham Road at the west, the central square fronting Scott House in the middle of the site, the elevated podium space on the western side of Scott House, and the two courtyard areas wrapped by new buildings at the eastern end of the site and south-western corner.
- 14.6. The application includes a Landscape Plan, a Planting Plan and a Landscape Strategy to provide detail on the assortment of furniture, materials, paving, plants and trees proposed. A condition is recommended that the landscaping, public realm and highways improvements should be built out in accordance with the Landscape Plan and Planting Plan, and that finer details of the hard and soft landscaping, alongside details of enclosure, lighting and furniture/play equipment are submitted for review. The condition should clarify that the Landscape Strategy is indicative and officers may advise alternate, comparable solutions to the ranges set out in the strategy when details are reviewed.
- 14.7. In general, the landscape approach is of a high-quality and well-considered. The landscape plan appropriately identifies different areas of function and character.
- 14.8. The green link directs pedestrians and cyclists through the site from Raynham Road, to the north of Scott House, through the central square and onto Upton Road; the planting and paving features provide a good level of visual interest and practical durability to this path.
- 14.9. The central square complements the improved access to Scott House and better utilises the space in front of Scott House to integrate the existing building into the site plan. Stairs down to the Scott House lower ground floor are planted and include play features to maximise utility; areas in front of commercial units are planted rain gardens as both SuDS mitigation and softening of the hardstanding.
- 14.10. The podium space on the west side of Scott House is an effective solution to making better use of the space occupied by the car park below. Residents of Scott House will also have direct access to the podium space at podium level. Suitable buffer areas have been designed into separate common podium space from first floor flats in Scott House and Block D that face the podium. It will be accessible only to residents of these two buildings and gating and fencing will be provided for security. A condition is recommended requiring that this podium be provided in accordance with the approved plans before occupation of new development.



- 14.11. The green buffer fronting the North Circular Road plays a vital part in adding green relief to this major vehicular road, softening the line of building facades and offering privacy to new residents. This area also provides a cycle path and pedestrian access along the North Circular and to the bridge across the North Circular – it is vital that the landscaping strikes a balance to meet all of these functions. The selection of planting and trees in the Landscape Strategy is generally appropriate and it is, again, recommended that a condition is included to agree the final set of plantings in this area and any form of enclosure that may be needed to define what is private and what is public space, without compromising the open character that all are keen to create.
- 14.12. The two courtyard spaces are each uniquely positioned and arranged. The eastern courtyard bounded by blocks E, G, H, I is long and narrow, and some of the space is dedicated to circulation between buildings as well as private gardens to individual units. The general arrangement is supported, with appropriate design mechanisms used to allow privacy to lower-level homes, while also creating an optimally green space with varieties of plants and doorstep play features, as well as swales. The smaller courtyard wrapped by Block D is more secluded with landscaping to support this quieter use. As before, a condition to require further detail will help to further define the final selection of planting and materials.
- 14.13. In sum, the landscaping approach is supported as it makes the most of the open space on the site in a thoughtful and deliberate way. Although the development inevitably involves a net loss of open space, the re organisation and form of the open space provided is well designed, supports Scott House and the new development and maximises the benefits of open space for all residents' use. Good maintenance will be key to the success of the open space, a condition is recommended to ensure the spaces are suitably looked after.

#### *Play space*

- 14.14. The London Plan, the London Play and Informal Recreation SPG and Policy DMD 73 all recognise that new development generates a need for suitable play space based on estimates of children that will occupy the site. It is generally expected that play provision is delivered on site – where this is not possible, there are means to meet needs off-site, most often through a planning obligation.
- 14.15. The London Play and Informal Recreation SPG provides a comprehensive set of guidance on the amount of play space need a development generates per age group and advises what form the play space should take to satisfy the needs. The table summarises the amount of play space expected of the proposed development and how much is provided on site as part of the application. The needs of the existing Scott House are included.

#### **Play space requirement per London Play and Informal Recreation SPG**

	<b>Required</b>	<b>Provided on site (shortfall)</b>
Age 0-4	781 sqm	821 sqm (0 sqm)
Age 5-11	639 sqm	318 sqm (-321 sqm)
Age 12+	530 sqm	0 sqm (-530 sqm)
<b>Total</b>	<b>1,950 sqm</b>	<b>1,139 sqm (-811 sqm)</b>

- 14.16. The application proposes several areas of play space throughout the Application Site; together, the play areas as identified by the applicant, total 1,139 sqm. Provision required for 0-4 year olds is met, however, there is a shortage of on-site provision for the 5-11-year old group, and age 12+ group. Policy DMD 36 and Enfield's S106 SPD require that open space need that is unmet on site should be mitigated through improvements within a stipulated distance. Improvements are secured through contributions through the S106 agreement. It is intended that the contribution will fund improvements to access to nearby open space – notably Florence Green Park, an engagement process with age 12+ local residents to inform the most suitable open space provision for this age group, and the delivery of new or improved open space amenity to mitigate the deficiency.
- 14.17. In addition to quanta, the London Play and Informal Recreation SPG further sets out what form play space should take relative to the size and nature of the development. This proposal generates a requirement for on-site local or neighbourhood playable space. Local playable space is generally suitable for children up to age 11 and should have natural landscaping, integrated play equipment for swinging, sliding and climbing, space for ball play and seating for supervision. A neighbourhood playable space is larger and allows for biking, skateboarding, basketball and lots of active play.
- 14.18. There are seven principal areas of play proposed on the site, ranging from doorstep play with small climbing features along the green link to more formalised play equipment on the podium space. In sum, the landscape design has taken several opportunities to incorporate play elements into the broader open space plan, using discreet spaces that would otherwise be reduced to circulation, to allow children to engage. The stairs down to Scott House on the central square, for example, include climbing and sliding; the eastern courtyard features bioswales that perform SuDS mitigation and introduce water play. The naturalistic, cohesive and incidental nature of the play features is a strength and complies with the direction of play design promoted by the London Plan, adopted guidance and increasingly Enfield emerging policy. The application includes an Open Space and Play Space Strategy with layouts of individual play areas and indicative ranges of play equipment and materials.
- 14.19. The proposed play provision is well designed and thought-out and, with contribution towards play improvements to mitigate the shortfall of provision on site, the overall strategy is supported. It is acknowledged that the play spaces on site, as shown in the landscape plan and Open Space and Play Space Strategy, does not fully meet the London SPG guidance for local playable space. The Application Site presents several constraining factors and, in a central location, the chief objective is to maximise the provision of housing and deliver suitable amenity alongside it. The proposed play elements are generally appropriate to the site. A condition is recommended to further refine the play features so they can maximise play opportunity per the London Play and Informal Recreation SPG and they are of a quality that will be durable and enhance the overall quality of the site's landscaping. A contribution to off site play and open space enhancements to address the deficiencies for the older age ranges will be secured through the shadow S106 Agreement.

#### *Trees*

- 14.20. Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially

those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.

- 14.21. At a local level. Policy DMD80 of the Development Management Document stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect. Additionally, Policy DMD 81 of the Development Management Document refers to landscaping.
- 14.22. The application includes a Tree Survey and Arboricultural Impact Assessment. The survey found that one Cockspur Thorn on the site requires felling as it in poor condition. The remainder of the trees proposed to be removed require felling because they are in the area of proposed building. The survey identifies 16 individual trees and tree groups that are proposed to be removed; these are deemed British Standards Condition B and C. Three trees are on TfL land adjacent to the North Circular, although still within the application boundary. The Assessment concluded that these trees provide “moderate” visual amenity. In addition to the comprehensive landscaping of the site, the application proposes the planting of 116 trees across the Application Site, including along the North Circular Road, within the proposed courtyard spaces and the central square, as well as the approaches from Raynham and Upton roads.
- 14.23. It is considered that, subject to appropriate conditions for an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) to demonstrate how the trees would be successfully protected throughout the site’s development, a planting plan/schedule and a landscaping specification including a scheme of aftercare and maintenance, the details are considered acceptable in relation to trees and in line with relevant policies including Enfield Policies DMD80 and DMD81 of the Development Management Document and Policy G7 of the London Plan.
- 14.24. While it is regrettable that so many existing mature trees are proposed to be removed to make room for the development, on balance the benefits associated with the proposal outweigh this loss of existing trees. The proposal includes 116 new trees amongst substantial amounts of landscaping, which will introduce a host of open space benefits that are, as a whole, supported.

*Impact to Epping Forest Special Area of Conservation (SAC)*

- 14.25. Natural England wrote to relevant Councils on 20<sup>th</sup> September 2018, in relation to the establishment of the Epping Forest Special Area of Conservation (SAC) Strategic Mitigation Strategy. Natural England have established a recreational ‘Zone of Influence’. Any residential development (proposing 100 plus units) within 6.2km of the SAC is required to deliver a package of avoidance and mitigation measures as well as make a financial contribution to strategic measures as set out within the costed Strategic Access Management Measures. This is to adequately mitigate, on a site by site basis, any recreational impact on the SAC that is located within the Zone of Influence.
- 14.26. Natural England were consulted on this application and outlined the applicant should undertake a Habitats Regulations Assessment (HRA) as well as provide

additional detail as to the avoidance and mitigation measures of the development. This work was undertaken by the applicant and submitted to Natural England.

14.27. The submitted HRA outlines the proposed measures delivered by this scheme to mitigate recreational pressure on the SAC, as summarised below:

- Well-designed open space/green infrastructure within the development
- Improvements to footpath networks
- Improved access and information to residents on locally available recreational spaces, including the 'Green Loop', Florence Green Park, Craig Park, and Pymme's Park
- Significant greening and landscape enhancements to the A406 and footbridge entrance
- Additional green areas between buildings and pedestrian routes
- An agreed SAMM payment (to be secured within the shadow S106 Agreement).

14.28. On receipt of the requested information, Natural England confirmed that they agree with the assessment conclusions and providing all mitigation measures outlined within the HRA are secured, Natural England has no objection and considers any impacts on the Epping Forest SAC or Lee Valley SPA and Ramsar can be appropriately mitigated.

#### *Urban Greening Factor (UGF)*

14.29. The planning statement states that the baseline Urban Greening Factor for the Site is calculated to be 0.26. The UGF Assessment for the Proposed Development provides a score of 0.43, which exceeds the London Plan target for residential development. This is considered acceptable.

### **15. Biodiversity and Ecology**

15.1. The NPPF (Para.174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. At a regional level, policy GG2 of the London Plan requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy GI4 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough. The emerging Local Plan, although of lesser policy weight, includes Policy BG3 which refers to a minimum of 10% net gain.

15.2. The provided DEFRA 3 Metric Biodiversity Impact Assessment Calculation reports a 10.21% increase in biodiversity units, which complies with biodiversity policy.

15.3. The buildings and trees have been assessed for their suitability for use by roosting bats and the development has been assessed in terms of its suitability

for protected species. The report concludes that the proposals are highly unlikely to affect protected species, including bats, reptiles and amphibians.

- 15.4. A few conditions are recommended to ensure that benefits to biodiversity and animal species are maximised:
- Hard and soft landscape is carried out in accordance with approved details and replaced within the first five year if plantings fail for any reason.
  - Full details of biodiversity enhancements should be provided.
  - A construction environmental management plan must be provided.
  - Full details of the green roof and vertical green wall including planting plans and maintenance schedules shall be submitted and approved in writing by the council.

## **16. Heritage and Archaeology**

### *Heritage*

- 16.1. NPPF paragraph 197 states that in determining 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 positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - (c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 16.2. Several heritage assets (designated and non-designated) are located on and near the Application Site. A designated asset is one which is on the Secretary of State's list of heritage assets and therefore of national importance. A non-designated asset is defined as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets. (Para 30 NPPF). For example, one that is on the Council's own local list or even of some local interest but not on the local list.
- 16.3. The Application Site includes two non-designated heritage assets: the centrally-located 18-storey Scott House and two- to four-storey Beck House in the eastern section of the site. The Application Site also affects the setting of two designated assets. The Application Site is approximately 200 metres east of the Fore Street Conservation Area and Angel Place, a Grade II listed terrace is approximately 300 metres north and west of the Application Site. The application also affects the setting of a non-designated heritage asset, Raynham Primary School, located on the southern boundary of the Application Site
- 16.4. The planning application has been informed by a Heritage Assessment, in line with paragraph 194 of the NPPF.

#### Beck and Scott House (non-designated heritage assets)

- 16.5. The two buildings were designed by T. A. Wilkinson for Enfield Borough Council and constructed in 1965 on the Angel Estate, previously the site of terraced homes characteristic of adjoining streets. The buildings are non-designated

heritage assets and were identified for their heritage significance in 2017 through a report commissioned by Enfield Council on post-war public housing in the borough.

- 16.6. Scott House was a prototype building constructed by the Edmonton Direct Labour Organisation with the vertical battery casting system evolved by Edmonton Council with the Building Research Establishment. Refurbishment of the building was completed in 2014 with over-cladding of the original red-coloured cladding.
- 16.7. Beck House is constructed of yellow brick and concrete, designed in the Brutalist style with distinctive access balconies running the length of the second and third floors, and a flat roof. The two buildings together are considered to hold group value having been designed and constructed at the same time.
- 16.8. The proposal includes the demolition of Beck House to make more efficient use of the site, provide an uplift of better-quality homes, replacement commercial space, functional open space and improved amenity. Works to Scott House will enable community space in the ground floor, rationalised building access and entry to a podium open area.
- 16.9. Paragraph 203 of the NPPF states:

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 directly or indirectly affect 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.
- 16.10. Demolition of a non-designated heritage asset such as Beck House is necessarily the highest end of harm to that significance. The significance that is harmed is that of a non-designated heritage asset(s).
- 16.11. The demolition of Beck House and rupture of the Scott House/Beck House group is proposed to enable a more efficient use of the Application Site, with a rationalised site plan that includes a considerable uplift in the number of much-needed homes, higher-quality and more liveable housing than exists at Beck House presently, contemporary accommodation of commercial tenants, purposeful and well-designed landscaping and recreational area, improved connectivity to surrounding streets and a design that promotes safety. The development introduces a high level of public benefit to the residents of the Application Site as well as the Angel Edmonton community.
- 16.12. Paragraph 205 of the NPPF states that local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. A Building Recording was undertaken and added to the Greater London Historic Environment Record in order to document the significance of this heritage asset.
- 16.13. In accordance with NPPF paragraphs 201 and 203, the many benefits, including public benefits, of the development are recognised. It is considered that these benefits outweigh the loss of Beck House, especially as it is a non-designated heritage asset and has relatively low heritage value. The benefits also outweigh

any harm to Scott House and Beck House as a group. It is considered that there will be no harm to the significance of Scott House by the design, scale, and layout of the new development. Whilst it will be in close proximity and will surround the non-designated heritage asset to the west, south and east, Scott House will remain the taller and more dominant element.

Fore Street Conservation Area (designated heritage asset)

- 16.14. The Application Site is approximately 200 metres east of the Fore Street Conservation Area. The significance of Fore Street Conservation is derived from its evolution throughout the 18th, 19th and 20th centuries. It is a main road leading north from London which originally attracted investment by prosperous residents in the 17th and 18th centuries. Over the 19th and 20th centuries development diminished in quality and the street transformed into a principle shopping street. Fore Street retains a number of good quality buildings which represent a diverse range of architectural styles and typologies, and signify the evolution of the street.
- 16.15. Section 72 of the P(LB&CA) A 90 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 16.16. Paragraph 199 of the NPPF 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’. Less than substantial’ harm does not mean a ‘less than substantial objection
- 16.17. For designated assets any harm identified should be assessed in terms of NPPF paras 199-202. Harm to a heritage asset is measured on a sliding scale with substantial harm being the highest. This is usually complete or almost complete loss of the asset. Everything else is described as less than substantial harm and proposals are assessed as being at the high, moderate, low or lower end of less than substantial harm or of having no harm.
- 16.18. The Site makes no contribution to the setting and significance of the Conservation Area. Whilst there will be an increase in inter-visibility, this will not have a detrimental impact. Given that Fore Street’s heritage significance is rooted in its architectural and historic interest as a commercial high street, it is not considered that the proposed development will affect this understanding and therefore cause no harm.

Angel Place (Designated heritage asset)

- 16.19. Angel Place is a terrace of mid eighteenth-century properties built as a series of three interconnected principal blocks. As a Grade II Listed Building, Angel Place is a building of national importance. Angel Place is approximately 300 metres north and west of the Application Site, across both Fore Street and the North Circular Road.
- 16.20. Section 66 of the P(LB&CA) A1990 requires us to ‘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’.

- 16.21. Paragraph 199 of the NPPF 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’. Less than substantial’ harm does not mean a ‘less than substantial objection
- 16.22. Given the intervening distance between the Application Site and the designated heritage asset, the Application Site makes no direct contribution to setting and significance of the group of terraces. whilst there will be a slight increase in inter-visibility from the south, this will not have a detrimental impact. It is considered that the development will cause no harm to the significance of Angel Place.

Raynham School (non-designated heritage asset)

- 16.23. Raynham Primary School, located on the southern boundary of the Application Site is a representative example of the way in which late 19th century schools were constructed in Enfield and how they have been adapted to educational needs up to the present day. Whilst there will be a change within the setting of the school, this will not harm the significance of the non-designated heritage asset. This is because residential development is appropriate in the setting of a school and the design of the scheme has mitigated any potential harm, for example the layout of the proposal has resulted in lower heights closest to the school

Summary of heritage

- 16.24. The proposals are considered to preserve the character and appearance of the Conservation Area, in line with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. With regards to the National Planning Policy Framework (2021), there is no harm caused to any designated heritage asset.
- 16.25. The highest degree of harm caused by the proposed development is the demolition of Beck House (a non-designated heritage asset). This will result in the total loss of significance together with harm to Scott House which would lose an important part of its setting. In weighing the application a balanced judgement will be required having regard to the scale of harm and the relative significance of the heritage asset. The significance that is harmed is that of a non-designated heritage asset(s).
- 16.26. There would also be low to medium levels of harm to the significance of Scott House, due to the group value held by the two buildings. The significance that is harmed is that of a non-designated heritage asset(s).
- 16.27. As set out by Paragraph 203 of the NPPF: 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, a balanced judgement will be required having regard to the scale of any harm or loss (in this case high harm to Beck House and low to medium harm to Scott House) and the significance of the heritage asset (in this case non-designated heritage asset). A designated asset will have more heritage significance than a non-designated asset.



- 16.28. The demolition of Beck House and rupture of the Scott House/Beck House group is proposed to enable a more efficient use of the Application Site, with a rationalised site plan that includes a considerable uplift in the number of much-needed homes, higher-quality and more liveable housing than exists at Beck House presently, contemporary accommodation of commercial tenants, purposeful and well-designed landscaping and recreational area, improved connectivity to surrounding streets, a design that promotes safety and several S106 contributions. The development introduces a high level of public benefit to the residents of the Application Site as well as the Angel Edmonton community. In the exercise of balance, and in line with NPPF paragraphs 201 and 203, greater weight is given to the substantial benefits afforded by the development.

### *Archaeology*

- 16.29. London Plan HC1 indicates that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 16.30. An Archaeological Desk-based Assessment was submitted in support of this application. Historic England GLAAS were consulted on the application and advised that although little archaeology has been found in the area of the site, this may be because little archaeological work has been carried out. It is recommended that an archaeological evaluation should be carried out to fully assess the archaeological potential of the site. A condition is recommended to require, first, an evaluation to clarify the nature and extent of surviving remains, and then, if necessary, a full investigation.

## **17. Transport, Access and Parking**

- 17.1. London Plan (2021) Policy 6.1 encourages partnership working in terms of transport and development that reduces the need to travel, especially by car whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy supports measures that encourage shifts to more sustainable modes of transport. London Plan (2021) The London Plan 2021 Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 17.2. Other key relevant London Plan policies include:
- Policy T2 – sets out a 'healthy streets' approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
  - Policy T3 – requires new development to safeguard sufficient and suitable located land for public and active transport;
  - Policy T4 – calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and

- Policy T5 – promotes the provision of an accessible and safe bicycle network with cycle routes and sufficient cycle parking;
- Policy T6 – indicates that car-free development should be the starting point for all locations that are well-connected by public transport and requires parking bays for disabled persons.
- Policy T7 – makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.

17.3. Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

#### *Pedestrian connectivity*

- 17.4. There is presently pedestrian and bicycle linking access to and through the Application Site that links into the street network. Approaching east from Raynham Road, the path into the site forks to the north and south of Scott House; the north leading to access to the North Circular Road, and the south leading to Woolmer and Upton roads. The legibility through the site and pedestrian experience is relatively poor in that sight lines are disrupted by Scott House and there is little active surveillance or animation through some sections of the routes. The application proposes to improve this condition by regularising the path through the site to one, more legible route that will serve as pedestrian, bicycle and controlled service access. Improvements to landscaping, new play features, arrangements of buildings, flow to and through the central square with commercial spaces and attractive paving will enhance the feeling of safety and create a more pleasant experience.
- 17.5. North-south connectivity is challenged by the North Circular, aided by the existing step-free footbridge with long ramps on both sides. On the southern side, within the Application Site, the condition of the footbridge will be improved with refreshed landscaping and additional greening.
- 17.6. There are pedestrian and cycle paths the length of the site along the southern side of the North Circular Road. In order to enable improvements to this stretch of public realm, these segments of paths are included in the Application Site. The proposal includes a planting strategy to 'buffer' the frontages of buildings from the North Circular Road with greenery and trees. The pedestrian path will also benefit from improved landscaping, lighting and street furniture. The applicant did address concerns with respect to sufficient surveillance of the North Circular Road path, particularly in front of the footbridge – this was improved with the addition of a window on the north side of Block E1.

- 17.7. In general, the application improves the pedestrian conditions through and around the Application Site.

*Cycle access and parking*

- 17.8. The site occupies an important location along an east-west cycling route between the Meridian Water and Silver Street rail stations. There are existing proposals for a greenway through the Upton Raynham area which will provide an alternative route to the existing cycle path along the North Circular. The scheme proposals to incorporate an east-west green link through the site, connecting Upton Road and Raynham Road will complement this aspiration and is welcomed.
- 17.9. In line with London Plan T5, the following cycle parking quantum is required as a minimum:
- Residential (134 units): 245 x long-stay, 4 x short-stay
  - Commercial (188sqm): 2 x long-stay, 5 x short-stay
  - Community (70sqm): 1 x long-stay (assuming max. 8 FTE staff), 1 x short-stay
- 17.10. The proposals include 248 long-stay spaces for residents, in secured cycle stores. While TfL advises that 20% of long-stay cycle parking be in the form of Sheffield Stands, the applicant proposes to provide 5%. Given space limitations, the inclusion of more Sheffield Stands could imply a reduction in cycle parking overall. A condition is recommended requiring the applicant to demonstrate how Sheffield Stands will be prioritised for use by those needing easier access, including children, older and disabled residents.
- 17.11. Short-stay cycle parking for all uses is provided, located at convenient points for all uses. A total of 24 spaces (12 Sheffield stands) are proposed. The good level of short-stay provision is welcomed. Along the North Circular, the easternmost section of the bicycle path will be diverted south slightly to allow a bank of planting and trees between vehicular lanes and the cycle path. Although short, this segment of protected lane is supported.
- 17.12. Long-stay parking to serve the commercial and community uses is required to have secure access control. The long-stay requirement equates to one space per commercial / community unit. A condition is recommended to require additional details to meet long-stay requirements for commercial cycle parking.
- 17.13. It is recommended that the final parking provision is secured by condition, with detailed drawings clearly stating the types of parking provision and dimensions for all cycle parking, in line with Chapter 8 of the London Cycling Design Standards.

*Public transport*

- 17.14. The Application Site is 500 metres from the Silver Street Overground station and 300 metres from Fore Street, the Angel Edmonton town centre. There is a bus stop on the North Circular just east of the footbridge that services the no. 33 and no. 444 bus routes. The majority of the Application Site has a PTAL rating of 5. PTAL is a rating by Transport of London of locations by distance from frequent public transport services. PTAL ratings range from 0 (the worst connectivity) to 6a/6b (the best connectivity). A rating of 5 indicates a very good level of connection to transport services.

- 17.15. While it is expected that the largest proportion of trips generated by the residential population on the site will rely on public transport, the transport modelling provided in the Transport Study indicates that the net increase in passengers during peak hours generated by the development will be modest and no impact is expected to public transport services.

#### *Vehicular Access and Parking*

- 17.16. Just as in the current condition, there is no proposed provision for general vehicular traffic through the site. Controlled service access is provided from Raynham Road, north of Scott House, through the central square and onto Woolmer Road or Upton Road. The only other vehicle access onto the site is from the junction of Woolmer Road and Upton Road onto the ramp to the under-podium parking west of Scott House. This arrangement, which gives precedence to pedestrian and cycle access through the site is supported.

- 17.17. The new development is proposed to be car-free. There is no provision of new parking for occupants of the new housing, commercial or community facility floorspace. The parking within the site boundary is proposed to be re-provided as follows:

#### **Reprovision of parking**

	<b>Existing</b>	<b>Proposed</b>	<b>Difference</b>
Scott House	32*	23	-9
Upton Road north	37	23	-14
Upton Road south	19	18	-1
	<b>88*</b>	<b>64</b>	<b>-24*</b>

\* While there are garages with 32 spaces presently beneath Scott House, they were deemed not to comply with current garage size standards and have been inaccessible for a number of years.

- 17.18. As the above table indicates, there is proposed a rearrangement of existing parking to construct new parking facility beneath the podium west of Scott House and re-organise parking bays along the north and south sides of Upton Road. The 18 proposed spaces on the south side of Upton Road include four Blue Badge bays for disabled users. While the table reflects a net loss of 24 parking spaces within the Application Site boundary, it should be understood that 32 of the spaces in the undercroft of Scott House have been inaccessible and unused for a number of years due to not meeting current standards. Therefore, the construction of 23 spaces beneath the podium implies a de facto gain of eight usable spaces on the site, and no practical loss of spaces resulting from the development. A condition is recommended to restrict the use of under-podium parking to just Scott House residents as access from the parking facility will be via Scott House stair cores.

- 17.19. Notwithstanding the favourable approach to not introducing new parking on the site for new development occupants, an assessment of parking stress levels in the area reveals that, with the proposed development and changes to parking provision, the level of parking stress is at 85%, the highest acceptable level. To address this, the application includes the following mitigation measures:

- High quality cycle parking
- Improved public realm and permeability
- No parking permits issued to future residents

- Funding towards a CPZ (Controlled Parking Zone)

17.20. These forms of mitigation are welcomed. The applicant proposed a contribution to a CPZ on the condition that a post-6-month-occupancy parking survey indicated that the level of parking stress rose above 85%. Given the amount of floorspace proposed and that the stress level is already at 85%, it is therefore recommended to secure by S106 a two-part contribution to the CPZ:

- Contribution towards CPZ consultation at commencement
- Contribution towards design and implementation at conclusion of consultation, if successful

17.21. With this form of CPZ obligation, the parking proposal is acceptable.

#### *Electrical Vehicle Charging*

17.22. Active charging spaces are proposed for five spaces in Scott House, and four on Upton Road. This total of 9 Electrical Vehicle Charging points exceeds the 20% requirement for active charging which is supported. The remainder of new spaces are passive to allow for future provision of EVC points if necessary. A condition is recommended to secure EVC provision.

#### *Delivery and Servicing*

17.23. As described above, the link between Upton Road and Raynham Road is proposed to be controlled as a Pedestrian Priority Route, closed to general traffic but providing a one-way route for refuse, fire and emergency vehicles only. These vehicles would access the site from Raynham Road and travel eastbound. Bollards are proposed at the eastern end of the route, on Upton Road and within public highway. Control will still be needed at the western entrance from Raynham Road. It is recommended that an obligation is secured via S106 for the consultation and implementation of Traffic Management Orders with access restrictions and ANPR from Raynham Road into site.

17.24. A delivery and drop-off bay is provided at the western end and north side of Upton Road. It will service residential and commercial deliveries. An Outline Delivery and Servicing Plan has been included within the TA. It finds that the proposed bay on Upton Road will provide enough capacity to accommodate the expected residential servicing demand. A condition to secure a detailed Delivery and Servicing Plan is advised.

#### *Healthy Streets and Active Travel Zone Assessment*

17.25. The application includes a Healthy Streets Transport Assessment and table 3.3 of the assessment sets out the development's position against the ten Healthy Streets Indicators. The assessment provided indicates that the proposed improvements onsite will improve upon the current arrangements.

17.26. Looking at wider connectivity by walking and cycling, the Active Travel Zone assessment considers access to key destinations at the neighbourhood scale. A common improvement recommended across all routes is the promotion of sustainable travel to reduce traffic. There are additional suggestions for tree planting along the route to Fore Street. In sum, offers are satisfied that the application proposes a car-free development with public realm and key route

improvements, cycle parking and enhanced landscaping. These measures contribute to improving cycling and walking conditions, and addressing many of the recommendations in the assessment. In all, officers are satisfied that the development positively supports Healthy Streets aims.

#### *Travel Plan*

- 17.27. A Travel Plan will be secured via an appropriate planning obligation within the shadow S106 Agreement inclusive of an agreed contribution of £5,000 which should form part of planning obligations within the S106 Agreement.

#### *Construction Logistics Plan*

- 17.28. An Outline Construction Logistics Plan has been included within the TA and is acceptable in principle. Due to the proximity of the school, deliveries should be prohibited activities. It is recommended that a detailed CLP is secured by condition to ensure deliveries are restricted during school pick-up and drop-off times, and that the applicant engage with the Edmonton Islamic Centre before submission.

### **18. Sustainability and Climate Change**

- 18.1. 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.
- 18.2. 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.
- 18.3. London Plan 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.
- 18.4. 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.
- 18.5. 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*

- 18.6. An Energy Assessment (November 2021) 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.
- 18.7. The assessment outlines that the development will achieve a reduction in energy demand through several efficiency measures that include insulated building fabric with low permeability; glazing with suitable U-value, g-value and daylight transmittance; mechanical ventilation with heat recovery and low energy lighting. These measures will achieve an overall improvement of 12% over Part L 2013, exceeding the London Plan target of 10%.
- 18.8. To address cooling and overheating, the assessment sets out a strategy to meet the cooling hierarchy and mitigate overheating risk using:
- Passivhaus principles with high levels of insulation
  - Glazing with low g-value
  - External shading using canopies and grating
  - Minimising heat generation with LED lighting, insulated pipework, location of utility cupboards
  - Increased ceiling heights and thermal mass
  - Passive ventilation
  - Mechanical Ventilation with Heat Recovery (MVHR) will be provided to all dwellings
- There are rooms that have been identified as at a risk of overheating; these are single aspect north facing bedrooms and kitchen/dining rooms and corner flats that have no southern facing elevations and, as such, cannot rely on openable windows for purge ventilation. These rooms and flats will be equipped with mechanical cooling to comply with criteria.
- 18.9. The development proposes to connect to the Enfield District Heat Network operated by Energetik. The assessment indicates that the connection to the DEN achieves a further 72% reduction in site total CO<sub>2</sub> emissions.
- 18.10. The proposed development will maximise the amount of PV located on roof spaces of the residential elements.
- 18.11. The proposed development achieves a 92.6% improvement in CO<sub>2</sub> emissions over Part L 2013 through onsite measures and would meet the GLA planning policy target for reduction in regulated CO<sub>2</sub> emissions. London Plan Policy SI 2 stipulates that where a zero-carbon target cannot be fully achieved on site, a carbon off-set contribution is required. A carbon off-set contribution has been agreed on the proposed development and is secured through the shadow S106 Agreement.
- 18.12. In order to ensure that the development is net zero-carbon and built in accordance with the submitted energy strategy, conditions are recommended that

the development is constructed in accordance with Energy Statement (November 2021) and that prior to the commencement of development, a technical note is submitted confirming how this development will meet the zero-carbon policy requirement in line with the Energy Statement, and prior to occupation, an Energy verification report confirming that the development has been built in accordance with the details submitted.

- 18.13. The application additionally includes a Whole Life-cycle Carbon Assessment. London Plan Policy SI2 encourages non-referable applications to prepare an assessment and demonstrate how the development will reduce life-cycle emissions. As many measures rely on detailed design, the submitted assessment sets out principles and assumptions for limiting the development's full carbon impact. A condition is recommended that, prior to commencement of development, a technical note is provided that includes detailed targets, measures and evidences how targets will be achieved.

### *Circular Economy*

London Plan Policy SI 7 promotes circular economy outcomes and net zero-waste in new development. Applications should demonstrate how they will:

- re-use or recycle materials from demolition and remediation works
- reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- provide opportunities for managing as much waste as possible on site
- support recycling and re-use
- accord with the waste hierarchy
- monitor and report performance

The application includes a Circular Economy Statement (October 2021). The statement sets out circular economy goals and a strategic approach to achieving them on site. A condition is recommended that prior to occupation, the applicant shall provide a post-completion report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement.

### *Site Waste Management Plan*

The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. Policy SI7 of the London Plan encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste. At a local level, policy CP22 (Delivering Sustainable Waste Management) of the Core Strategy sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.

A Preconstruction Site Waste Management Plan (November 2021) was submitted as part of the application. The scope of this plan concerns construction, excavation and demolition materials. Matters relating to operational waste and waste servicing are not considered within the scope of the plan. The report includes estimates of waste arising from construction of buildings. It is understood that these calculations are approximations based on available information. The application also includes a Pre-demolition Site Waste Management Plan that details the amount of waste resulting



from demolition of existing structures to enable development; this is based on structural audit and sets out targets for waste that will be retained and re-used on site and waste that will be recycled. Given that further information related to construction waste will emerge as details of the proposal are development, a condition is recommended for a Site Waste Management Plan to monitor targets and set out a strategy for operational and servicing waste management.

## **19. Environmental health**

### *Air quality and pollution*

- 19.1. Policy SI1 of the London Plan set out the requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 19.2. At a national level, the NPPF recognises that development proposals which directly address transport issues and promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 19.3. Finally, at a local level, policy DMD65 of the Development Management Document requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 19.4. Enfield's environmental health officer has reviewed the submitted Air Quality Assessment. The Assessment considers the location of the proposal on the North Circular Road and examines any risk to occupiers associated with air quality conditions at the location. The officer accepts the result of the Assessment that in the anticipated year of occupation, end of 2024, the levels of measured pollutants (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) are well below the baseline thresholds and air quality at the location will be acceptable.
- 19.5. The Air Quality Assessment puts forward suitable measures to control construction dust. These measures must be implemented to effectively control dust. Further, a condition is needed to that all non-road mobile machinery (NRMM) complies with emission standards.
- 19.6. Further, a condition is recommended requiring that an investigation and assessment of the extent of contamination is submitted to officers for consideration.

### *Noise*

- 19.7. The acoustic assessment proposes suitable glazing for the facades of the development. The report also discusses ventilation for overheating and as the development is in an area of high ambient sound the facades identified in the acoustic report as being anticipated to be exposed to sound levels above 48dB LAeq, 8hr at night must be provided with mechanical ventilation to allow sufficient cooling of their dwellings without having to open windows. Windows must still be openable to allow purge ventilation.

- 19.8. A condition is recommended to ensure that noise from mechanical plant does not cause an unacceptable loss of amenity to residents.
- 19.9. In terms of outdoor acoustic conditions, the Noise Assessment finds the level of noise are acceptable throughout the site with the exception of two points of access onto the Application Site nearest the North Circular Road. The entrance to the east of Block E1 onto the public square and the entrance further west to the east of Block A both measured levels of noise that exceed comfortable use. Mitigation has been designed into the plan. In the western area, a wall and climbable berm that is part of a small play space helps to block excessive noise. Adjacent to Block E1, the entrance will include a screening structure that will also mitigate noise – this structure is yet to be fully designed and as such, a condition is proposed that this screening is designed with further advice from officers.

### *Wind*

- 19.10. The submitted Pedestrian Level Wind Desk-Based Assessment finds that during the windy season, the vast majority of the site is comfortable for sitting and standing. A band that wraps the west and south side of Scott House is comfortable for strolling. Overall, this level of wind is deemed to be acceptable.

## **20. Flood Risk and Drainage**

- 20.1. 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 run-off 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.
- 20.2. 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).
- 20.3. The Site falls mostly within Flood Zone 1, where there is a low risk of flooding from ground water, sewers and overland flows, however there are areas to the centre and west which fall within Flood Zone 2, and smaller areas which are within Flood Zone 3 where the risk of flooding is higher.
- 20.4. The proposed development overhauls the existing site plan and landscape arrangement. SuDS measures including rain gardens, swales, detention basins and blue/green roofs are proposed to be incorporated within the design. Whilst this is strongly supported by officers, there is still extensive use of below ground attenuation. The design approach should utilise above ground storage for primary attenuation, with below ground storage only for supplementary attenuation if required. On that basis, an appropriate condition should be attached to secure a detailed SuDs Strategy to allow for further consideration of above-ground attenuation. With the proposed condition, the SuDs officer has no objections to this element of the proposal.
- 20.5. With respect to flood risk, the applicant has submitted a Flood Risk Assessment (FRA) which assessed possible sources of flood risk in respect of London Plan

Policy SI12 and SI13. Originally, both the Environment Agency and the Council's SuDS officers issued objections due to 1) concern that the proposal is within 8 metres of a culverted watercourse, the Pymmes Brook and 2) insufficient information, and specifically, questions around the appropriateness of the flood model used to carry out the FRA. Following the submission of additional information, the EA advised that the objection due to the location of the development can be removed. The EA is conducting further assessment of the model to make a final determination on flood risk. SuDS officers have reviewed details of applicable flood models and advise:

- The model takes into account a retaining wall surrounding the Angel Community Centre, which is demonstrated to have flood risk benefits to the site. Detailed information regarding the wall has not been provided. A condition is recommended (as below) requiring further details of the wall to fully understand the flood risk benefit. Further, if the wall provides essential flood risk benefit, then a S106 obligation would be required to ensure its retention and future maintenance, or equivalent reinstatement.
- Buildings at the westernmost end of the site, including Block A1, have been designed with Finished Floor Level below predicted flood levels as these units are to be fully accessible and step free. There is a similar condition at Scott House, although it is an existing building. SuDS officers accept this condition on the basis that the flooding likelihood of the 1 in 100 year plus climate change flood event is rare and that a condition is included requiring further assessment of whether flood resilient or resistant measures should be included here and if a flood evacuation plan is required.

20.6. SuDS officers further recommend the following conditions to render the proposal acceptable:

- Prior to commencement, details of the Sustainable Drainage Strategy
- Prior to commencement, a Flood Risk Technical Note with details of the retaining wall and finished floor levels
- Prior to occupation, a Verification Report demonstrating that the approved flood risk management and SuDS measures for that phase have been fully implemented

## **21. Socio-economics and Health**

### *Socio-economics*

21.1. 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.

21.2. 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.

- 21.3. To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that the Shadow S106 agreement secures employment and skills obligations in accordance with the S106 SPD.

#### *Health Impact Assessment*

- 21.4. 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 criteria.
- 21.5. 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.
- 21.6. 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. As recommended by policy, the Healthy Streets approach has been utilised to inform the Transport Assessment and shape the manner in which the design development of the scheme has come forward. Landscaping and public realm improvements that this scheme will deliver, as well as the promotion of more sustainable forms of transport through the introduction of cycle parking to the site, cumulatively, in officers' view, result in benefits to both existing residents of the estate, and future occupiers of homes proposed.

## **22. Shadow S106 Heads of Terms**

- 22.1. In setting out financial contributions to be secured through a S106 Agreement, the applicant has prioritised the delivery of affordable housing across the proposed development. As a consequence, it is stated that without compromising the viability of the applicant being in a position to bring forward the proposed development, the applicant is not in a position to address all identified requirements of the adopted Enfield S106 Supplementary Planning Document (SPD). The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within a S106 Agreement:

Heads of Terms	Description	Sum
Affordable Housing	Accommodation Schedule confirming the number, mix and tenure of affordable homes.	£0
Design	Retention of project architect.	£0
	Design monitoring costs.	£0
Education	Contribution towards improved education provision.	£339,690
Employment & Skills	Employment and Skills Strategy.	£0
Energy	Carbon Offset Payment towards the Carbon Offset Fund	£32,077
	Connection to Energetik district heat network.	£0
	Monitoring ('Be Seen' – GLA Energy Monitoring Portal).	£0
Epping Forest SAC	SAMMS contribution	£1,876
	Additional mitigation measures.	£4,500
Health Services	Contributions towards health facilities and services.	£74,920

Open Space	Contribution towards provision of play space off-site.	£200,000
Public Realm	Maintenance Plan	£0
Flooding	Retention and maintenance of flood wall; equivalent reinstatement	£0
Transport	Travel Plan.	£0
	Travel Plan monitoring.	£5,250
	CPZ consultation contribution at commencement.	£10,000
	CPZ TMO and implementation contribution at conclusion of consultation.	£23,000
	Raynham Road TMO consultation and implementation	£0
	Highway works, including dropped kerb and tactile surface provision at four locations	£0
	<b>Total</b>	<b>£691,313</b>

### 23. Community Infrastructure Levy (CIL)

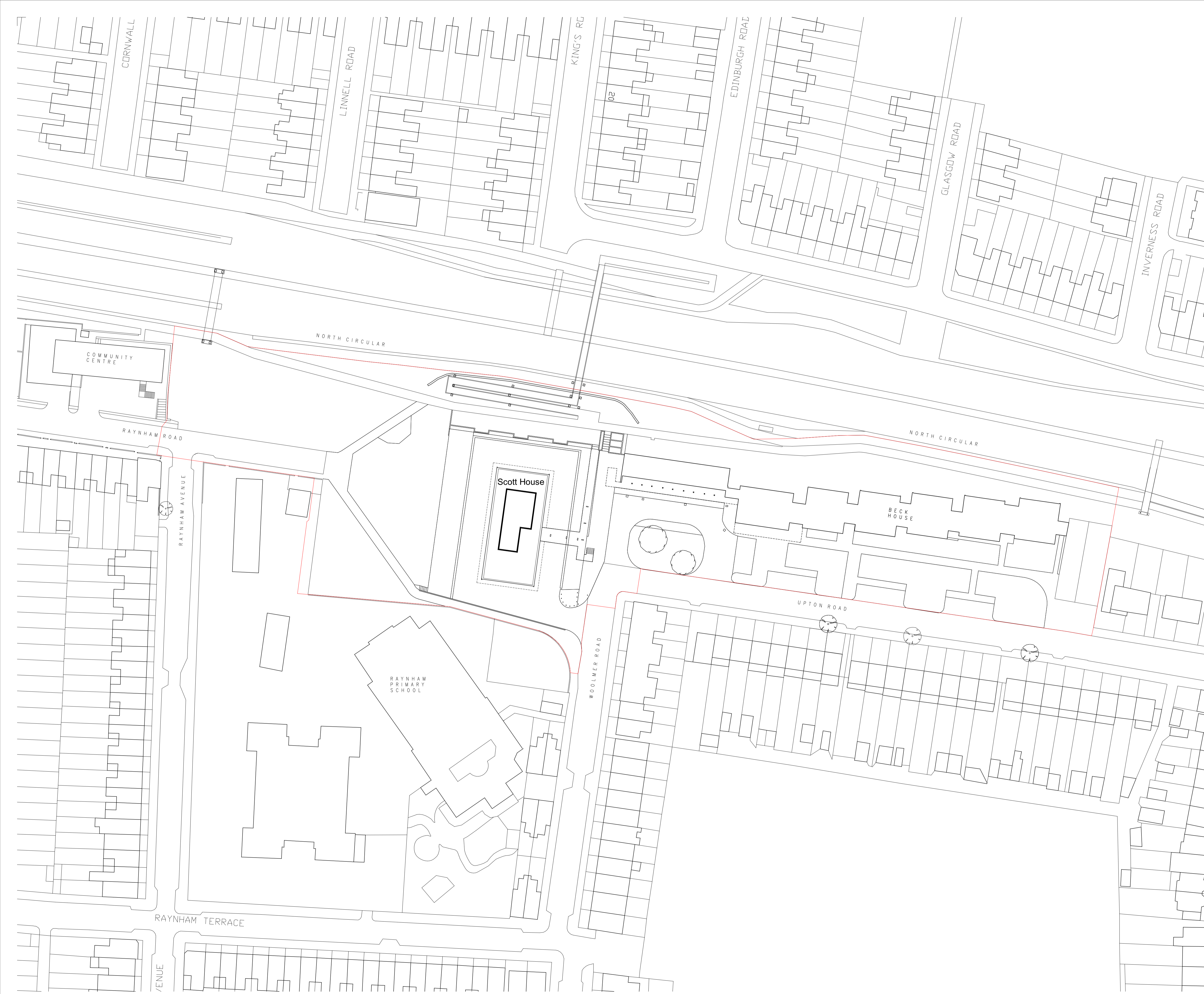
- 23.1. Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 23.2. In line with the applicant's CIL liability form, the amount of MCIL owed is £672,312. The amount of Enfield CIL owed is £448,608. This calculation factors the deduction of Beck House floorspace as the description of development includes the demolition of Beck House. Should Beck House be demolished pursuant to the determination of prior approval, the CIL liability would be revised. The development of social housing is exempt from MCIL under the 2008 Act. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

### 24. Conclusion

- 24.1. The application proposes an intensification of the established residential use on previously developed land that has been identified for additional housing growth. The proposal exceeds LBE's adopted affordable housing target of 40% and the London Plan's target of 50% with an offer of 69% affordable units.
- 24.2. There is a pressing need for housing, including affordable housing, and Enfield has a challenging 10-year housing delivery target. This application proposes 134 new, high-quality homes. The scheme will deliver 53 family-sized homes.
- 24.3. The applicant has engaged with the LPA in undertaking extensive pre-application advice inclusive of the development being presented to the Enfield Place and Design Quality 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.
- 24.4. The scheme delivers substantial benefits on site for both existing and new site residents, as well as surrounding Edmonton communities. Landscaping and public realm are enhanced to create safer, greener and more pleasant connections with local streets. The development results in the introduction on site of cycle parking, play space and communal amenity space, as well as contributions towards improvements to nearby parks. The entrance to Scott House is arranged to be more accessible and creates a feature of the centre of

the site. New commercial units and a community hall will better serve local residents.

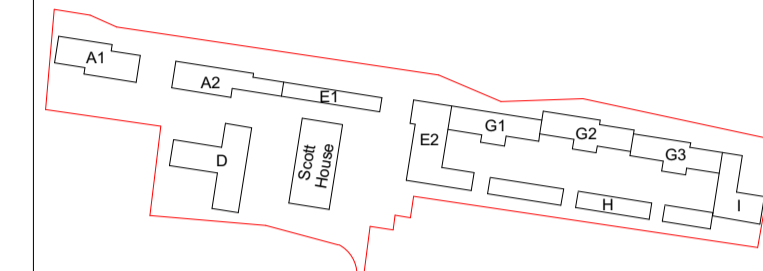
- 24.5. The development is concluded by officers, for reasons set-out within this report, to broadly accord with the adopted policy framework as well as relevant emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedules, and within the shadow Section 106 Agreement, the application is recommended for approval.



**Notes**

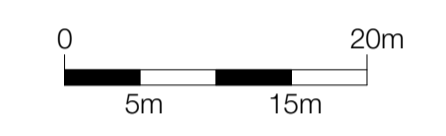
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**KEY**

■ ■ ■ ■ Site boundary



P1 09/11/2021 Planning Submission RF  
 Rev Date Description Drawn / Checked

Project name

**Upton and Raynham  
Enfield**

Drawing number Rev

**3736 - LB - 00 - XX - DR - A - 102000** **P1**

Drawing

**Existing Site Plan**

Purpose of issue  
 Planning

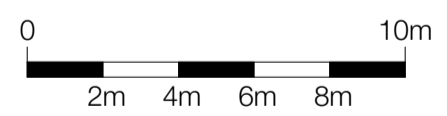
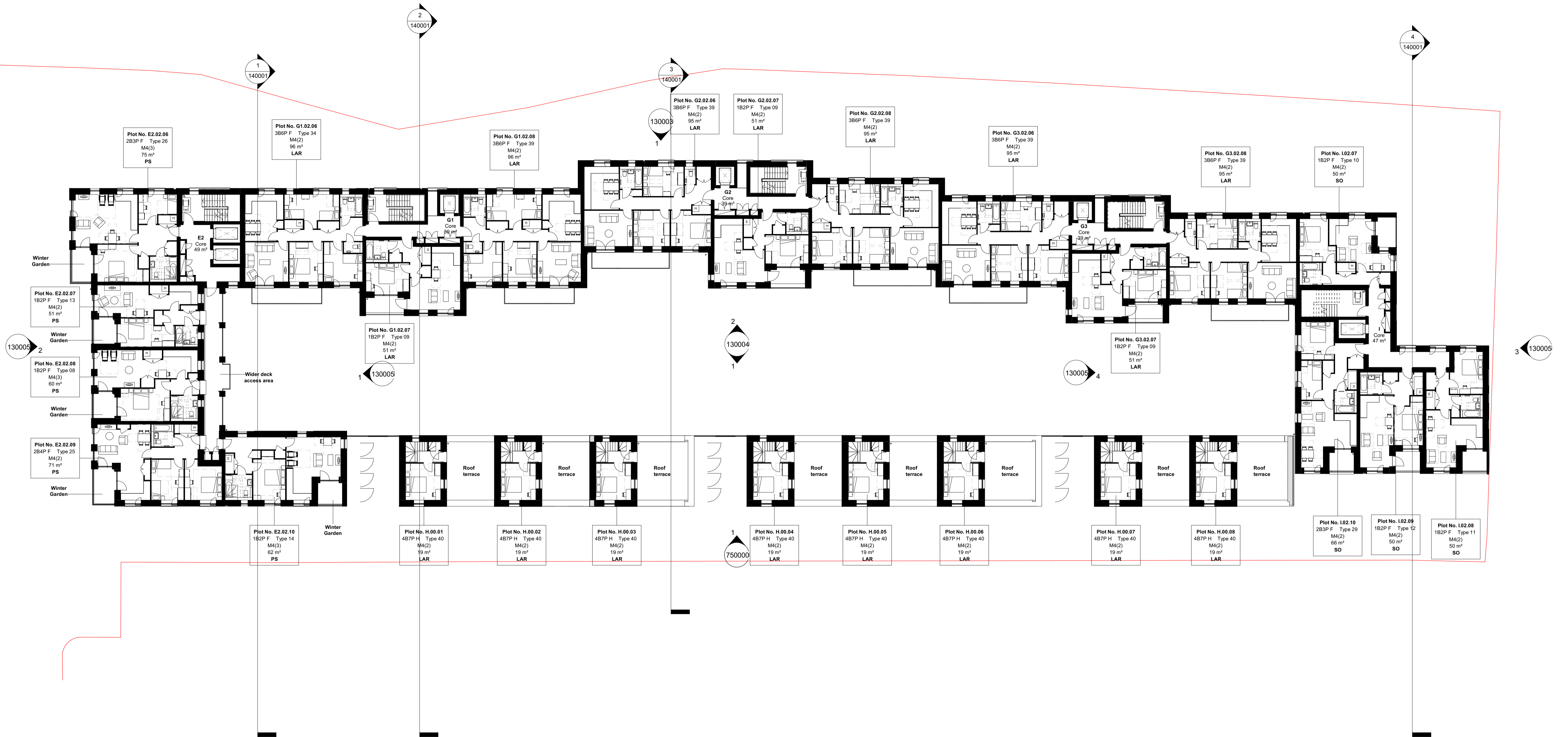
Scale Date  
 1 : 500 @ A1 02/11/21

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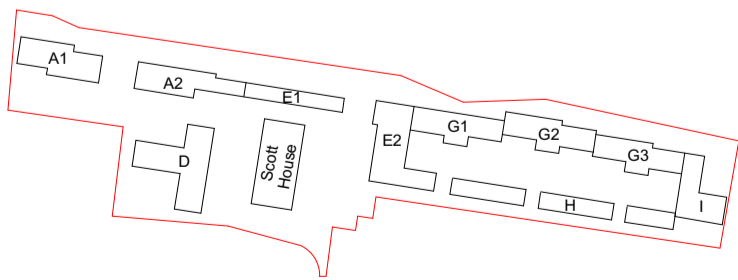
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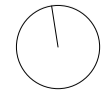
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M= Maisonette  
H= House

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<b>Enfield</b>			
Drawing number		Rev	
<b>3736 - LB - 00 - 02 - DP - A - 120006</b>		<b>P3</b>	
Drawing <b>Proposed Second Floor Plan - Level 02 (1 of 2)</b>			
Purpose of issue		Subsidiary Code	
<b>Planning</b>			
Scale		Date	
<b>1 : 200 @ A1</b>		<b>02/11/21</b>	
Client			
<b>LB of Enfield</b>			

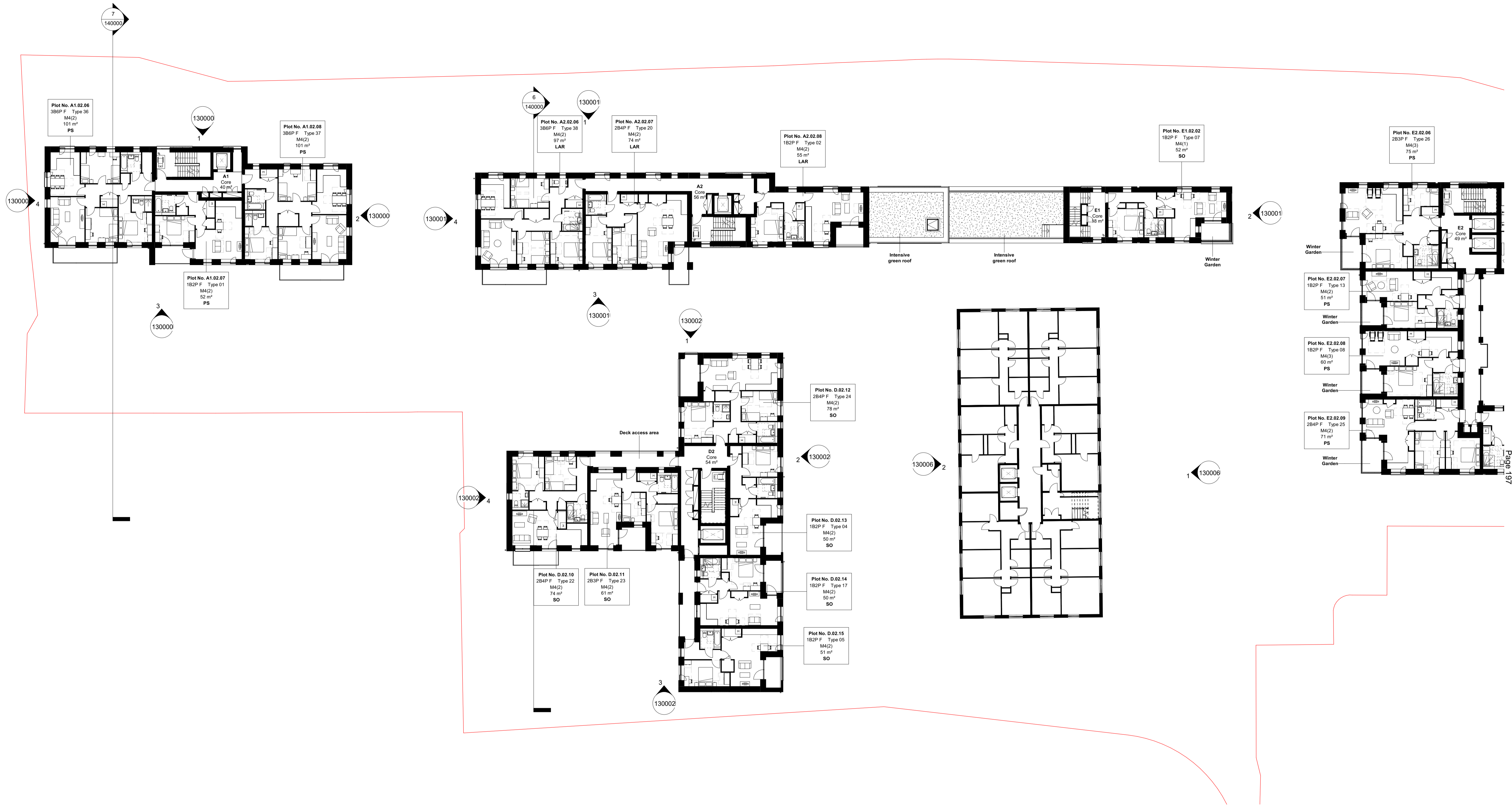
  

P3	28/01/2022	Houses levels updated to reflect terrace buildup	GC
P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF
Rev	Date	Description	Drawn / Checked

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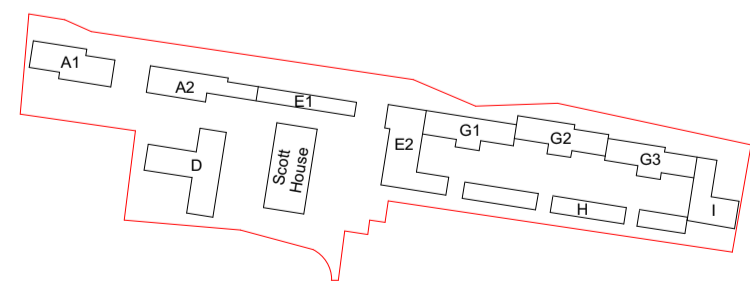




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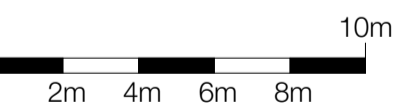
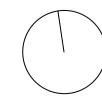
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Project name	Upton and Raynham		
Drawing number	Enfield		
Rev			
Drawing	3736 - LB - 00 - 02 - DP - A - 120007	P2	
Purpose of issue	Proposed Second Floor Plan - Level 02 (2 of 2)		
Scale	1 : 200 @ A1	Date	02/11/21
Client	LB of Enfield		
Rev	Date	Description	Drawn / Checked
P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF

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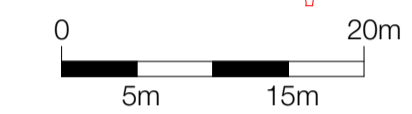
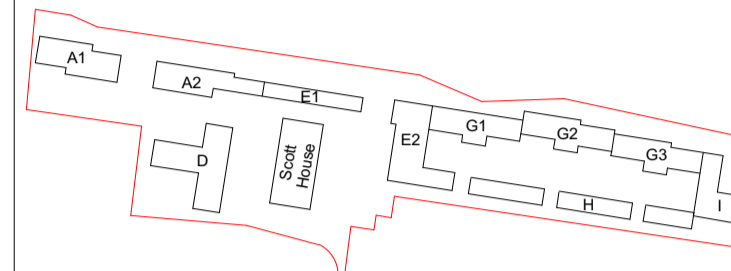
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Indicative gateway wall, refer to design code

P3	28/01/2022	Cycle store doors widened, gates added to eastern courtyard	GC
P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF
Rev	Date	Description	Drawn / Checked

Project name

**Upton and Raynham  
Enfield**

Drawing number **3736 - LB - 00 - GF - DR - A - 110001** Rev **P3**

**Proposed Site Plan**

Purpose of issue **Planning**

Scale **1 : 500 @ A1** Date **02/11/21**

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1 Sitewide section AA  
1 : 500



2 Sitewide section BB  
1 : 500

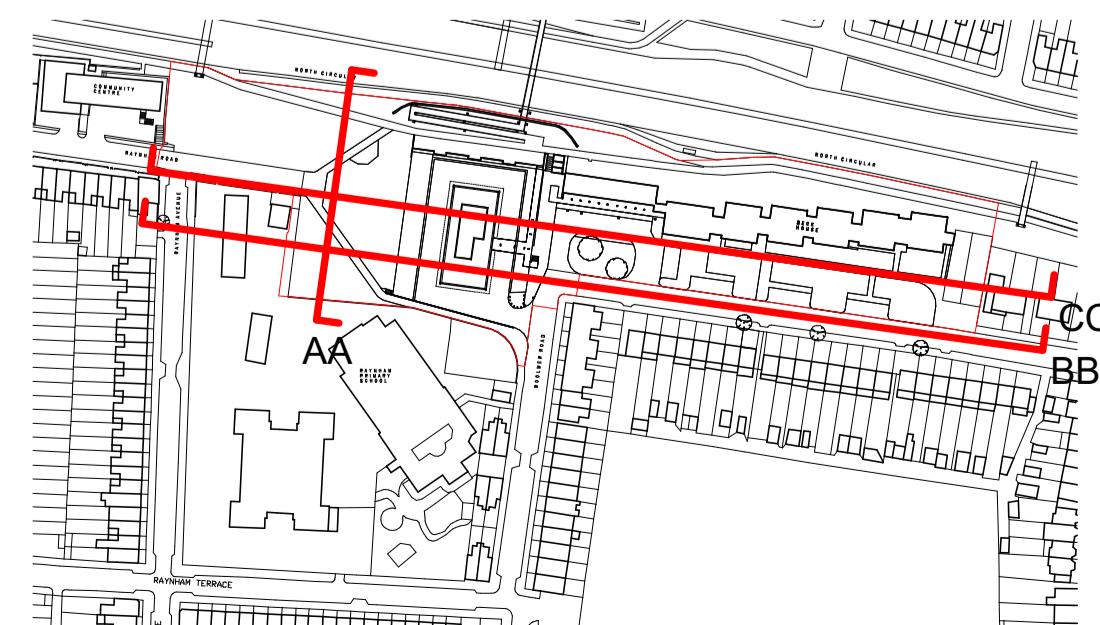


3 Sitewide section CC  
1 : 500

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Project name

**Upton and Raynham  
Enfield**

Drawing number Rev

3736 - LB - 00 - XX - DE - A - 115000 P3

Drawing  
**Proposed Site Wide Elevations /  
Sections**

Purpose of issue Suitability Code

Planning

Scale Date

As indicated @ A1 02/11/21

Client Drawn / Checked

LB of Enfield

P3 28/01/2022 Texture and colour added to elevations GC

P2 19/11/2021 Planning Submission RF

P1 09/11/2021 Planning Submission RF

Rev Date Description

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1 Sitewide Section DD  
1 : 500



2 Sitewide Section EE  
1 : 500



3 Sitewide section FF  
1 : 500

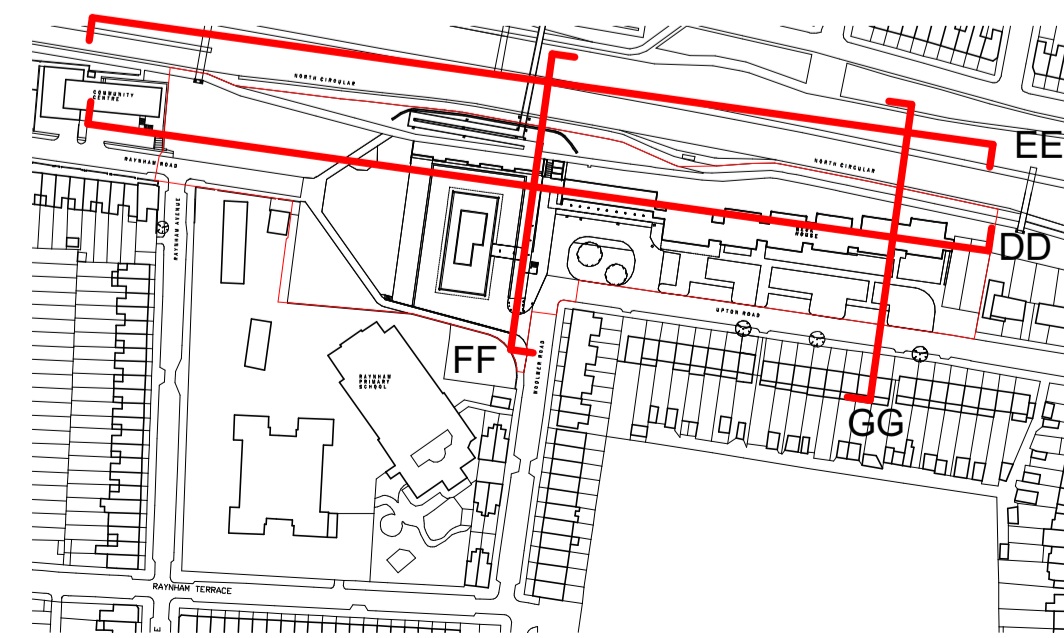
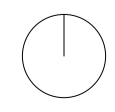


4 Sitewide section GG  
1 : 500

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Project name

**Upton and Raynham  
Enfield**

Drawing number Rev

3736 - LB - 00 - XX - DE - A - 115001 **P3**

Drawing  
**Proposed Site Wide Elevations /  
Sections 2**

Purpose of issue Suitability Code

Planning

Scale Date

As indicated @ A1 11/05/21

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Rev	Date	Description	Drawn / Checked
P3	28/01/2022	Texture and colour added to elevations, window added to Unit 1	GC
P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF



**GENERAL**

- Red line boundary
- Indicative route for emergency vehicles
- Existing level
- Proposed level
- 1:3 slope banks

Acoustic screen to be located within the gap to the north of the new Aquatic Centre, design and material treatment to be developed in consultation with local residents and to be subject to further design.

**MATERIALITY**

- Permeable flow reinforced artificial stone paving base 800x700mm and 800x600mm colour and finish to match existing standards
- Asphalt (cycle path) colour to match existing
- Permeable self-binding gravel
- Wash coat
- Flushed concrete path light grey colour
- Pre-cast concrete slabs on grass dimensions to later detail, light grey colour
- Permeable pre-cast concrete pavers 300x100mm and 100x100mm, warm grey/wood colour, staggered alternating pattern
- Permeable pre-cast concrete pavers (parking bay) natural colour
- Asphalt driveway colour to match existing
- Tarmac with cobble aggregate
- Permeable pre-cast concrete wet joints at square
- 30x30x45, 3 colour grey mix (light mid dark), herringbone bond pattern
- Reinforced concrete colour to later detail
- Granite slab blocks light grey colour
- Granite slab gable dimensions to later detail, light grey colour
- Granite slab base with boulders dimensions and colour to later detail

**PLANTING**

- Existing planting
- Planting, refer to Planting Plan
- Planting in raised planter, refer to Planting Plan
- Linear dry swale, refer to Planting Plan
- Existing tree to be retained
- Existing tree to be removed
- Proposed tree planting medium size, refer to Planting Plan
- Proposed tree planting small size, refer to Planting Plan
- Proposed multi-stem bush, refer to Planting Plan

**FURNITURE**

- Standard bench, refer to DAS
- Bespoke seating strip, refer to DAS
- Concrete bench family, refer to DAS
- Shielded cycle stand, refer to DAS
- Steel planter edge, refer to DAS
- Steel planter box, refer to DAS
- Steel raised planter with integrated seating edge, refer to DAS
- Traffic dropped bollard, refer to DAS
- Electric vehicle street charging post
- Dry rear inlet, refer to Architectural drawings
- Communal bike storage with secure roof, refer to DAS
- Cycle store with secure roof, refer to DAS
- Bin store with secure roof, refer to DAS

**BOUNDARY TREATMENTS**

- Steel gate, refer to DAS height 2100mm
- Steel fence, refer to DAS height 1100 to 2100mm
- Steel fence, refer to DAS height 400mm
- Steel fence located on top of steel raised planter, refer to DAS height 400mm
- Brick wall with fence steel top, refer to DAS total height 2100mm

**LIGHTING**

Location of lighting fixtures to be coordinated later with the electrical layout.

- Light pole with top lantern, refer to DAS
- Light pole with multiple spotlights, refer to DAS
- Bollard, refer to DAS
- In-ground luminaires, refer to DAS

**PLAY EQUIPMENT**

- Slipping top, FSC certified timber
- Climbing net, FSC certified timber and rope
- Pump bridges with integrated sea saw, FSC certified timber and rubber
- Log with balancing ropes, FSC certified timber
- Slide stainless steel
- Rockboulders
- Slipping stones, concrete
- Reclaimed timber log
- Slipping stones, steel
- Slipping rubber element, to later detail
- Slipping rubber multi surface with steel inserts, to later detail

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Projectname		UPTON AND RAYNHAM	
Client		LEVITT BERNSTEIN	
Scale	1:250	Format	A0
Sheet/Sheets		Phase	Planning Version
Projectnumber	21-067	Drawn by	Status
Filename	21-067_Raynham Rd Landscape Plan-220128.dwg		
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