



PLANNING COMMITTEE

Tuesday, 7th December, 2021 at 7.30 pm
Conference Room, Civic Centre, Silver
Street, Enfield, EN1 3XA

Contact: Jane Creer / Metin Halil
Committee Administrator
Direct : 020-8132-1211 / 1296
Tel: 020-8379-1000
Ext: 1211 / 1296

NOTE: Planning Committee meetings are now being held physically and are no longer being filmed or broadcast live. Members of the Public who wish to hear/view the Committee meeting can attend in person.

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

MEMBERS

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

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

AGENDA – PART 1

1. **WELCOME AND APOLOGIES FOR ABSENCE**
2. **DECLARATION OF INTEREST**
3. **REPORT OF THE HEAD OF PLANNING** (Pages 1 - 2)

To receive the covering report of the Head of Planning.

4. **20/04193/FUL - GAS HOLDER SITE, PINKHAM WAY/STATION ROAD, LONDON, N11 1QJ** (Pages 3 - 80)

RECOMMENDATION:

1. That subject to the referral of the application to the Greater London Authority and the completion of matters covered in this report, the Head of Planning or the Head of Development Management be a planning permission subject to conditions.
2. That the Head of Development Management/ Planning Decisions Manager be granted delegated a heads of terms and agree the final wording of the conditions to cover the matters in the Recommend report.

WARD: Southgate

4.1 Corrected Front Page & Executive Summary - 20/04193/FUL - Gas Holder site, Pinkham Way/Station Road, London, N11 1QJ (Pages 81 - 82)

5. 21/02088/FUL - HOLLY HILL FARM, 305 THE RIDGEWAY, ENFIELD, EN2 8AN (Pages 83 - 100)

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

WARD: Chase

6. FUTURE MEETING DATES

Future meetings of the Planning Committee will be:

- 14 December 2021
- 4 January 2022 – Provisional
- 18 January 22
- 3 February 2022 – Provisional
- 22 February 2022
- 8 March 2022 – Provisional
- 22 March 2022
- 5 April 2022 – Provisional
- 26 April 2022

MUNICIPAL YEAR 2021/2022

COMMITTEE:
PLANNING COMMITTEE
 7.12.2021

REPORT OF:
 Head of Planning

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

AGENDA - PART 1	ITEM 3
SUBJECT - MISCELLANEOUS MATTERS	

4.1 APPLICATIONS DEALT WITH UNDER DELEGATED POWERS INF

4.1.1 In accordance with delegated powers, 168 applications were determined between 12/11/2021 and 26/11/2021, of which 138 were granted and 31 refused.

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

Background Papers

To be found on files indicated in Schedule.

4.2 PLANNING APPLICATIONS AND APPLICATIONS TO DISPLAY ADVERTISEMENTS DEC

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

Background Papers

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

This page is intentionally left blank

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 7 December 2021
Report of: Head of Planning	Contact Officer: Andy Higham Gideon Whittingham Eloise Kiernan	Ward: Southgate
Application Number: 20/04193/FUL		Category: Major
LOCATION: Gas Holder site, Pinkham Way/Station Road, London, N11 1QJ		
PROPOSAL: Redevelopment of the site to provide a mixed use development including the erection of two blocks 14 and 19 storeys in height, comprising of 182 residential units (Use Class C3), 371 sqm of commercial floor space (Use Class E), common amenity space, together with accessible car parking spaces, bike parking spaces for residents use, hard and soft landscaping and associated works.		
Applicant Name & Address: City and Suburban Homes C/o Savills		Agent Name & Address: Miss Molly Morris Savills 33 Margaret Street London W1G 0JD
RECOMMENDATION:		
<ol style="list-style-type: none"> 1. That subject to the referral of the application to the Greater London Authority and the completion of matters covered in this report, the Head of Planning or the Head of Development Management be a planning permission subject to conditions. 2. That the Head of Development Management/ Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommend report. 		

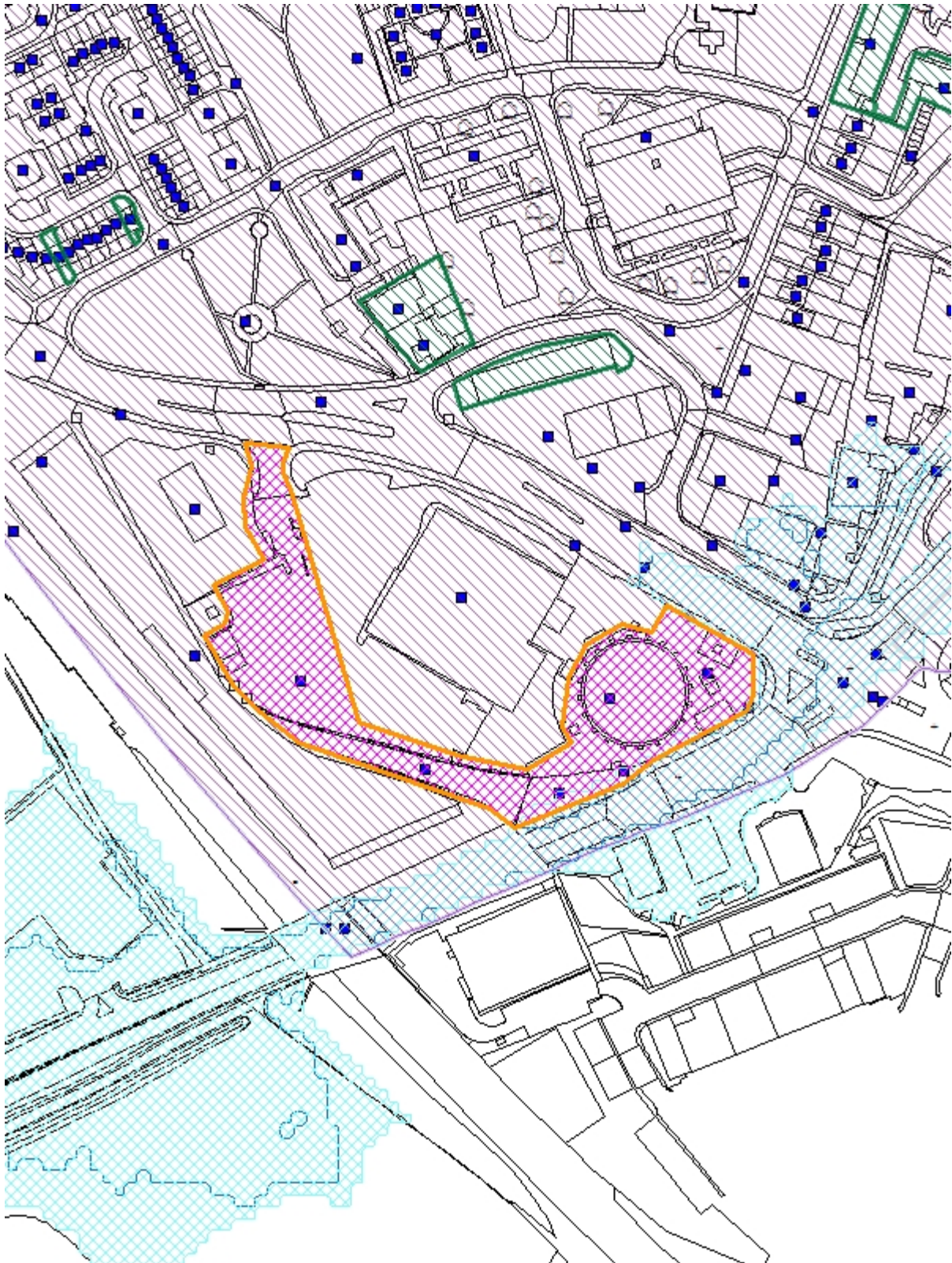
1. NOTE FOR MEMBERS

- 1.1 The application is reported to the Planning Committee for determination because it is categorised as a major development, involving more than 100 residential units in accordance with the scheme of delegation.

2.0 EXECUTIVE SUMMARY

- 2.1 The report seeks approval for the redevelopment of the site to provide a mixed use development including the erection of two blocks ranging between 14 and 19 storeys in height (not including the lower ground floor and roof level),

Ref: 20/04193/FUL **LOCATION: Gas Holder, Pinkham Way, London, N11 1QJ**



comprising of 182 residential units (Use Class C3), 371 sqm of commercial floorspace (Use Class E), communal amenity space, together with accessible car parking spaces, bike parking spaces for residents and for the commercial use, hard and soft landscaping and associated works.

- 2.2 The site is identified as an 'opportunity site' (No. 2/3) within the Council's adopted North Circular Area Action Plan (NCAAP 2014 - 'New Southgate Neighbourhood Place'). NCAAP Policy 12 (New Southgate) establishes the principle of redeveloping the Application Site for residential led mixed use development.
- 2.3 The delivery of housing on underutilised brownfield sites in sustainable locations (close proximity to overground/underground, bus station) and within close proximity to a designated local centre has strong planning policy support and should be afforded substantial weight in the determination of the application.
- 2.4 Developing existing brownfield land protects the Boroughs can help in safeguarding greenfield and greenbelt land, thus preserving this important characteristic of Enfield – and is supported at all planning policy levels, nationally, London-wide and within Enfield's adopted development plan policies.
- 2.5 The proposal would support London Plan policies, which seek to increase housing supply and optimise site capacity. The site is assessed to be a sustainable location suitable for delivery of new high-quality housing – which is supported in principle. The introduction of flexible commercial space, or residential amenity space is supported in strategic and placemaking terms.
- 2.6 The proposed development includes 182 new residential units with a breakdown of 71 (1b2p (39%)), 69 (2b4p (38%)) and 42 (3b5p (23%)). Additionally, the scheme would provide 30% affordable housing with a breakdown of 70% social rent and 30% intermediate rent. This would contribute high quality housing stock to the Borough to meet housing need – which continues to rise in the Borough. The scheme would also provide improved local commercial services and facilities.
- 2.7 There is a pressing need for housing, including affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. Past delivery against housing targets accentuates this need and taking account of the presumption in favour of approving sustainable development and the tilted balance which currently applies, it is considered that the proposed development would deliver a high quality residential-led development on existing brownfield land – in a sustainable location. The site has a PTAL of 4 (6b being the best).
- 2.8 Overall, the proposal would make a meaningful contribution towards Borough and wider London housing needs – helping Enfield to support its growing population.

3. RECOMMENDATION

- 3.1 That subject to the referral of the application to the Greater London Authority and the completion of a S106 to secure the matters covered in this report, the Head of Planning or the Head of Development Management be authorised to GRANT planning permission subject to conditions.
- 3.2 That the Head of Development Management/ Planning Decisions Manager be granted delegated authority to finalise the heads of terms and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

3.3 Conditions

1. Time limit – 3 years
2. Approved plans
3. Materials – drawings, samples and sample panels
4. Boundary Treatment/s
5. Playspace Design
6. Landscaping – details and management plan
7. Public realm strategy
8. Biodiversity enhancements
9. Details of green roof
10. Rainwater harvesting details
11. Secure by Design
12. Inclusive Design - M4(2) and M4(3) - include percentage 90% and 10%
13. Sustainable Drainage Strategy
14. Sustainable Drainage Strategy - Verification Report
15. Lighting Details / Plan (Building & Public Realm)
16. Site Waste Management Plan
17. Acoustic Report
18. Noise Mitigation Measures (future occupants)
19. Disabled Parking
20. Car Park Management Plan (Final)
21. Details of Cycle Parking
22. Delivery and Servicing Management Plan (operational)
23. Construction Logistics Management Plan (CLMP)
24. Construction Resource Management Plan (CRMP):
25. Arboricultural Method Statement with Tree Protection Plan (non-standard wording)
26. Habitat Survey (Phase 1)
27. Contaminated Land – Remediation
28. Contaminated Land – Verification
29. Energy Statement – management and maintenance
30. Thermal Comfort – further details of wind effects and related mitigation
31. Green Procurement Plan – details for how the procurement of materials for development will promote sustainability
32. Details of any Rooftop Plant, Extract Ducts and Fans incl. Plant Ac. Report
33. Details of any rooftop plant, extract ducts and fans (appearance)
34. Fire evacuation lift (details / management)
35. Electric vehicles
36. Taxi stand details
37. Heritage – Gas Holder history
38. Permitted development restrictions on use of flexible space
39. Opening hours for flexible uses
40. PD restriction on satellite equipment
41. No plant equipment to be fixed to external face of building
42. No roller shutters to be fixed to external face of buildings

4. SITE AND SURROUNDINGS

- 4.1 The application site is located at the junction on the northern side of the North Circular (A406)/Pinkham Way and south western side of Station Road. The site is irregular in shape and approximately 0.48 hectares in size.
- 4.2 To the south of the junction is Bounds Green Road (A119) with the Bounds Green Industrial Estate directly opposite the application site, across the North Circular (A406). To the west of the application site are two single-storey retail

units and associated car parking. Further to the west is an elevated railway line with a four-storey builders' depot running parallel to the tracks.

- 4.3 The site previously contained the 1912 '3 lift gas holder' which was the last remaining gas holder that formed part of New Southgate Gas Works. The gas holder was identified as a non-designated heritage asset, however, was removed under prior approval ref. 19/00547/PAMEDe and infilled under planning permission ref. 19/00617/FUL. The site is currently vacant and has been cleared and remediated. A telecommunications mast remains to the eastern boundary of the site, adjacent to Station Road.
- 4.4 The site is not statutorily or locally listed, nor located within the boundaries of a Conservation Area.
- 4.5 To the northern side of Station Road is the Ladderswood Estate and the New Southgate Millennium Green. Immediately to the north are the Homebase site and Topps Tiles site, which together with the application site form the Western Gateway.
- 4.6 The application site is identified within the North Circular Area Action Plan and the New Southgate Master Plan.
- 4.7 The application site falls within close proximity to the Boroughs boundaries with London Borough of Haringey to the south and London Borough of Barnet to the west.
- 4.8 The site is well connected in terms of public transport and has a good Public Transport Accessibility Level (PTAL) rating of 4. New Southgate overground is located approximately 500m to the north-west and Arnos Grove underground station (Piccadilly line) approximately 600m to the north east. The site is also adjacent to a proposed section of Crossrail 2.
- 4.9 The site is currently accessed to the north of the site, through the forecourt of the existing Homebase Store, which abuts the application site to the north west. The ground levels to the north are slightly elevated and increase further north towards New Southgate.
- 4.10 A series of mature trees line the southern boundary of the Site and the three lime trees are protected by a Preservation Order (TPO 411/2020).
- 4.11 The following policy designations / characteristics apply to the site:
 - Flood Risk: The Site is predominantly located within Flood Zones 1 and partly 3 to the southern boundary;
 - North Circular Area Action Plan Opportunity Site;
 - New Southgate Place Shaping Area;
 - Place Shaping Priority Area / Regeneration Priority Area / Area Action Plan;
 - Tree Preservation Order: There is a Tree Preservation Orders (TPOs) to the southern boundary adjacent to the North Circular (A406).

5. PROPOSAL

- 5.1 This is an application for the redevelopment of the site to provide a mixed use development including the erection of two blocks ranging between 14 and 19 storeys in height (not including the lower ground floor and roof level), comprising of 182 residential units (Use Class C3), 371 sqm of commercial floorspace (Use Class E), communal amenity space, together with accessible car parking spaces, bike parking spaces for residents and for the commercial use, hard and soft landscaping and associated works.
- 5.2 The building heights and unit numbers would be as follows:

- Tower A 19 storeys (110 units and 280 sq.m of commercial floorspace)
 - Tower B 14 storeys (72 units and 91 sq.m of commercial floorspace)
- 5.3 The breakdown of the 182 residential units would comprise 71 (1b2p 39%), 69 (2b4p (38%) and 42 (3b5p (23%). Additionally, a total of 59 units (32%) would be wheelchair adaptable with 33 in Tower A and 26 in Tower B.
- 5.4 The scheme would provide 30% viability tested affordable housing with a breakdown of 70% social rent and 30% intermediate rent.
- 5.5 The tallest of these buildings – Tower A would be located towards the north-eastern corner part of the site nearest to Station Road. Tower B would be located further south west fronting the North Circular/Pinkham Way (A406). Both buildings feature a glazed set back to ground floor, mid-level cut outs and expressed exoskeleton to the top of the tower. Additionally, Tower A also features a. cut out to the top of the tower to appear slender within long distance views.
- 5.6 Whilst the buildings match in regard to their footprint shape and size, they are distinguished from each other by virtue of their varied height, colour and orientation. There is a separation of 20 metres between the building to provide a public realm area at ground floor level. The winter garden private amenity is located on the corners of the platform to increase transparency to the edges of the form. The buildings are orientated so that the facades which face towards the North Circular have a continuous winter garden to act as a buffer to the noise and air quality of the road. Triple height cut-outs are made to the mid-levels of each building to provide a series of communal amenity space for the residents.
- 5.7 The emphasis of the proposed building façade is exoskeleton, formed with a white concrete to link in with the white painted steelwork of the former gasholder. The design of the scheme is the result of substantial pre-application engagement to produce high-quality buildings and public realm which incorporates and reflects the vernacular of the surrounding townscape. In addition, the articulation and materiality of the buildings have been carefully considered to provide a contemporary and landmark building at the Western Gateway.
- 5.8 The site access would be provided via the existing access from Station Road into the Homebase site, which would connect to the vehicular ramp at the south west corner of the application site. The main pedestrian access into the site would also be from Station Road through a publicly accessible square. This would be aligned with the emerging access route down Palmers Road through the Ladderswood Development from Arnos Grove station. Additionally, there are a number of proposed secondary pedestrian access points along the North Circular to improve permeability to the existing bus stop. In regard to commercial and residential entrances, these would be provided at both ground and upper ground floor levels.
- 5.9 Car parking for residents would be provided at the lower ground floor level and accessed by a designated ramped access to the west of the site. This equates to a total of 18 accessible car parking spaces (10% of all units). A total of 334 cycle spaces would be provided for residents. Each tower would feature an externally accessed secure cycle storage adjacent to each residential entrance at ground and upper ground levels, with further externally accessed secure stores provided at the upper ground level to Tower B and at a sunken ground floor level to Tower A with ramped access from Station Road and shower facilities. In regard to commercial cycle parking, a total of 11 spaces would be provided within the unit and the public realm.

- 5.10 All servicing would be provided at the lower ground floor level and accessed by a designated ramped access road to the west of the site. The lower ground floor would provide designated bin storage for both Tower A and Tower B as well as commercial storage. Additionally, a loading bay would be incorporated into the public highway at Station Road.
- 5.11 A total area of communal amenity space at ground floor level equates to 1,832 sq.m including a new publicly accessible square at the upper ground floor level to the north and a terraced and stepped landscape positioned between the two buildings to connect the upper and lower ground levels. There is also a well landscaped southern boundary to improve the relationship and environment with the North Circular (A406). In addition to the private amenity space at ground floor level, further amenity space provision would be incorporated into the design of the towers. Both Tower A and B would feature intermediary façade cut-out with balconies overlooking the base of each intermediary façade cut-out from the two storeys immediately above. Tower A would feature 3 cut outs at 5th, 11th and 17th floor levels. Tower B would feature 2 cut outs at 3rd and 8th floor levels. Roof terraces would also be provided with half of the roof area of each tower serving a common amenity while contributing to local play space provisions. Winter gardens would provide private amenity space to residential units.

Changes post submission:

- 5.12 Some revisions have been made to the scheme during the assessment of the application. These revisions are as follows:
- Revised landscaping scheme to reduce the number of proposed trees to provide a more balanced and sustainable planting
 - Further information to serve the Microclimate Report focussing on testing mitigation measures to the high level cut out communal open spaces and conclude that these areas would be adequately mitigated.
 - Updated viability information and affordable housing contributions
 - Updated layouts to show clear segregation storage for use and boilers
 - An updated schedule of accommodation to confirm internal space standards for each dwelling
 - A loading bay incorporated into the public highway at Station Road

6. RELEVANT PLANNING DECISIONS

- 6.1 19/02930/PREAPP - Proposed redevelopment of site to create a mixed-use development of commercial spaces and 180 residential units – pre application advice issued.
- 6.2 20/01104/PREAPP - Proposed redevelopment of site to create a mixed use development of commercial spaces and 180 residential units – pre application advice issued.
- 6.3 19/00547/PAMEDE - Demolition of gasholder and ancillary structures – No objections Prior Approval not required.
- 6.4 19/00617/FUL – Infilling of redundant gas holder base – granted with conditions.
- 6.5 20/00849/CND - Details pursuant to ref: 19/00617/FUL: Revised Construction Management Plan (3), for the infilling of redundant gasholder base – granted with conditions.
- 6.6 In October 2020 an EIA Screening Opinion request was made to the Council to establish whether the proposed works would constitute EIA development as

assessed against Regulation 6(1) of the EIA Regulations. The council agreed that the Development did not constitute EIA development. (Application reference 20/03239/SO).

Neighbouring sites - Ladderswood

- 6.7 P12-02202PLA - Phased redevelopment of site involving demolition of existing buildings, construction of new roads and erection of a total of 517 self-contained residential dwellings, incorporating 149 affordable dwellings, comprising (Block A) a 6-storey block of 23 flats (8 x 1-bed, 12 x 2-bed, 3 x 3-bed); (Block B) a part 3, part 4-storey block of 10 flats (6 x 1-bed, 4 x 2-bed); (Block C) a part 3, part 4-storey block of 10 flats (6 x 1-bed, 4 x 2-bed); (Block D) a part 2, part 3-storey block of 11 flats (9 x 1-bed, 2 x 2-bed); (Block F) a 6-storey block of 28 flats (3 x 1-bed, 25 x 2-bed); (Blocks G) a part 5, part 6-storey block of 27 flats (11 x 1-bed, 16 x 2-bed); (Block H) a part 5, part 6-storey block of 27 flats (11 x 1-bed, 16 x 2-bed); (Block J) a part 4, part 5-storey block of 28 flats (13 x 1-bed, 11 x 2-bed, 4 x 3-bed); (Block K) a part 4, part 5-storey block of 24 flats (10 x 1-bed, 11 x 2-bed, 3 x 3-bed); (Block L) a part 5, part 7-storey block of 26 flats (10 x 1-bed, 9 x 2-bed, 7 x 3-bed); (Block M) a part 6, part 8-storey block of 33 flats (18 x 1-bed, 15 x 2-bed); (Block N) a part 5, part 7-storey block of 31 flats (16 x 1-bed, 13 x 2-bed, 2 x 3-bed); (Block S & T) a part 3, part 6 storey block of 46 flats (18 x 1-bed, 25 x 2-bed, 2 x 3-bed); (Block X) a 6-storey block of 17 flats (5 x 1-bed, 12 x 2-bed); 81 x 3-storey terraced houses (66 x 3-bed, 15 x 4-bed); (Block P, Q & R) a part single, part 2, part 4, part 6, part 7, part 8-storey block comprising community centre and commercial use within classes B1(b)/B1(c) and 74 flats (36 x 1-bed, 25 x 2-bed, 12 x 3-bed, 1 x 4-bed) with basement parking; (Block V) a part 4, part 5, part 6-storey block comprising a 80-bed hotel and 21 flats (9 x 1-bed, 12 x 2-bed) with basement parking and commercial floorspace within classes B1(b)/B1(c); provision of energy centre below blocks A and X; installation of photovoltaic solar panels; construction of vehicular access to Palmers Road, Weld Place and Station Road; provision of associated car parking; construction of children's play area, provision of private and community amenity space, together with relocation of hornbeam tree from Upper Park Road, adjacent to Betspath House to south of the site within the communal amenity area at The Ladderswood Estate, Bounded by Station Road, Palmers Road and Upper Park Road, London N11 – Granted with conditions, February 2014.

7. CONSULTATIONS

Public Consultation

- 7.1 Initial consultation on the application involved notification letters being sent to 737 neighbouring properties on 28 January 2021 (giving people 28-days to respond) and a press advert in the Enfield Independent on 3 February 2021 (giving people 14 days to respond).
- 7.2 Additionally, site notices were also posted at the application site on 9 February and expired on 2 March 2021.

- 7.3 In respect of the number of representations received from neighbours, local groups etc. these were as follows:

Number of representations objecting received: 23

Number of representations received in support: 1

- 7.4 The matters raised were as follows:

- Affects local ecology
- Close to adjoining properties
- Development too high
- General dislike of proposal
- Inadequate parking provision
- Inadequate public transport provision
- Increase in traffic at an already busy junction
- Increase of pollution
- Loss of privacy
- More open space needed on development
- Noise nuisance
- Over development
- Strain on existing community facilities
- Loss of parking
- Overcrowding of the area
- Loss of light to balcony and living room of flats in nearby properties at Weavers Court, 13a Montmorency Gardens
- Out of keeping with character of the area-the height is far greater than anything within the area and should be no higher than Ladderswood Estate
- Increased green open space is required, not more poured concrete. I support the suggestion from Roland Hewes a member of the BHORA Committee, who has asked Councillors if they would be interested in getting behind a plan to use the entire footprint of the former gas holder to plant dense woodland. The area of the former Homebase and car park could then be used for housing although the ridge height of any development shouldn't be greater than Ladderswood opposite
- There is an amount of overdevelopment in this area which has led to an excessive demand on the infrastructure and services in this area. Overdevelopment can lead to insufficient amenity space and also impact on local amenity and character of the neighbourhood. A further increase in the local population will have a significant impact on public service provision, therefore there will be increased pressure on hospital and GP services as well as schools, transport and policing. Issues of density and overdevelopment causes loss of the open aspect of the neighbourhood.
- No consideration for the wellbeing of the residents in the neighbourhood. Never mind the noise and disturbance arising from the actual execution of all the works. We are also very concerned about the many environmental, health and local traffic congestion implications of overdevelopment by compounding the noise congestion and pollution in the local area. Studies have shown that poor air quality can cause shortness of breath, aggravate asthma and other respiratory conditions and also affect the heart and cardiovascular system.
- Serious effects of air pollution on the environment can lead to climate change.

- 7.5 Norton Rose Fulbright LLP submitted an objection on behalf of National Grid on the following grounds:

- The developer, the subject of the Application has no vehicular access and cannot be delivered.
- No substantive engagement has been undertaken with NSPL to agree terms to provide that vehicular access and should have been.
- NSPL is willing to negotiate terms to provide suitably accommodating vehicular access across the former Homebase site to access the gasholder site.
- A master planned / collaborative approach to the redevelopment of adjoining sites needs to be taken that:
 - Is open and fair
 - Takes account of permitted development on the former Homebase site
 - Takes account of future development constraints, such as Crossrail 2
 - Takes account of future development opportunities to maximise the development of previously developed land
- There is no justification for Enfield to consider the use of compulsory purchase powers to acquire a right of access across the former Homebase site to provide access to the gasholder site.
- Any access to the gasholder site across the former Homebase site needs to be flexible so that it can adapt to future development constraints / opportunities, and development phases

7.6 A summary of reasons stated by those supporting the scheme were:

- The gas holder frame is quite attractive; however, the site is an obvious location for brownfield redevelopment would bring benefits to the area such as useful amenities and a nicer local area.

Internal

- 7.7 Environmental Health - No objection subject to conditions
- 7.8 SuDS/Flooding/Drainage - No objection subject to conditions requiring Sustainable Drainage Strategy (pre-commencement other than for Enabling Works) and Verification Report.
- 7.9 Traffic and Transportation Team - No objections subject to conditions and S106 contributions.
- 7.10 Waste Management - No comment.
- 7.11 Energetik - No objections as the submitted planning documents confirm connection to the DEN whereby both the capacity and pipework are available at the eastern edge of Station Road ready to be extended to this development

Statutory and Non- Statutory Consultees

- 7.12 London Borough of Haringey – No objections
- 7.13 London Borough of Barnet – No comments received
- 7.14 London Fire Service - No objection.
- 7.15 Metropolitan Police Service (Designing Out Crime) - No objection subject to conditions.
- 7.16 Cadent (National Grid) – Objection

- 7.17 Thames Water - No objection.
- 7.18 Transport for London (Planning) - No objection subject to conditions and s106 obligations relating to:
1. Undertake Stage 1 Road Safety Audit for all highway proposal;
 2. Secure appropriate financial contribution toward local pedestrian, cycle, public realm improvements and highway safety
 3. The access route should be designed to avoid the Crossrail 2 Safeguard area;
 4. Secure the provision of cycle parking and approval of details by condition;
 5. Secure the provision of all car parking (including ECVP) and Car Parking Management Plan;
 6. Secure legal restrictions to exempt future residents' eligibility for local parking permits and expand CPZ if needed;
 7. Secure the DSP and CLP by conditions;
 8. Improve the Travel Plan ensuring it contribute positively toward the Mayor's sustainable travel goal and secure them by s106 agreement; and
 9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail.
- 7.19 Environment Agency - No objection following receipt of a revised FRA and consideration of climate change and naturalisation of the brook.
- 7.20 Historic England – No response, however, were broadly content with the emerging proposals at pre application stage, subject to addressing and considering issues with the Local Planning Authority.
- 7.21 GLA (Stage 1 response) (summarised):
- Land use principle: The principle of residential led mixed-use development of this redundant utility site within an Opportunity Area site is supported.
- Affordable housing: Initially raised concerns with the lack of affordable housing.
- Design and heritage: The location of tall buildings on this site is supported by Enfield Council's local planning policies. The overall approach to the building height, massing and elevation treatments are supported, and both the design and residential quality are of a high standard. The development will cause less than substantial harm to heritage assets and conservation areas, but the public benefits, including affordable housing, must be confirmed before assessment can be carried out.
- Issues also need to be resolved in relation to sustainable development and transport
- Officer response: Following negotiations affordable housing is now proposed on site at 30% viability tested affordable housing with a breakdown of 70% social rent and 30% intermediate rent. Additionally, further transport matters were resolved by the receipt of additional information to clarify electric charging points, allocation of cycle parking, loading bay and clearance height for access ramp. Further information was required by the Environment Agency and SuDs team regarding climate change in regard to fluvial and ground water flood risk.

The Environment Agency also raise the possibility of naturalising Bounds Green Brook in this location; however these objections have now been resolved.

7.22 Design Review Panel

The scheme was presented to Enfield's Design Review Panel twice with the latest two block scheme considered in October 2020. The DRP meetings followed from a series of pre-application meetings where the Council's design and planning officers discussed the overall bulk, scale and massing with the applicant, as well as principles for materiality and relationship with the surrounding built context. This scheme differed substantially from the current proposal as it provided three buildings of 8, 12 and 16 storeys. This initial approach to the site looked to enclose a central south facing public courtyard space with a mid to higher-rise form set back away from the road and wrapped around a taller tower element. The taller tower element was positioned on the corner of the site to mark its position as a gateway to the New Southgate area.

The key points from the Panel's response in October 2020 are summarised as follows:

- The Panel is pleased with direction of the scheme's development.
- Many of the fundamental problems from the previous scheme have been resolved by a two-block approach.
- We welcome the increase in public realm, clear locations and proposed rear access.
- We welcome the proposed massing and height. Notwithstanding this support, the scheme must continue to engage with discussions with neighbouring Local Authorities to assess the impact of harm done to heritage assets, as well as how the scheme is seen from long, mid and short views.
- The proposed cut-outs to the building as upper gardens across multiple floors are positive. There is potential to re-introduce the community rooms from the previous version of the scheme at these floors.
- The strategy to locate the winter gardens needs to be clearly thought through. The harsh context (proximity to North Circular, Station Road, railway track) would suggest that they need to be at multiple locations, not just one elevation, as there is a need throughout for protection to noise, air pollution and hostile outlook.
- The proposed façade design is going in a positive direction, however, there are too many elements currently being used. Careful façade detailing (1:20 scale) will clarify the required elements and protect the future development from 'value management' as it goes through the development process.
- The scheme needs to refine how it defines a sense of place, reflected both in its architectural and landscape design. Currently, the scheme has adopted a traditional approach to high-density development, without taking due regard to the harsh context it must contend with.
- The landscape proposal should be revised to provide more of a sense of enclosure at street level
- Justification to keep an open frontage to the North Circular based on a projected increase of electric car use is questionable, as the volume of traffic and presence of vehicles themselves, undermine a sense of residential place that the scheme should aim to achieve.
- This can be done by having some bunding along the perimeter of the scheme, such as the south border. There are other less attractive spaces along the North Circular which are actively occupied, and we would hope this would become a great place to be at.

- The flooding strategy needs to be clarified and to determine if the site will address wider flooding in the North Circular. This will inform the landscape approach.
- In terms of accessing the site, the large-scale basement cycle parking is problematic as it is not an attractive experience for users and has potential security issues.
- In terms of visitors / deliveries, the sequencing of arrival and delivery needs to be clarified, be safe and visible.
- The car parking needs to be visible and secure. How this is achieved needs to be confirmed.
- How the site is connected to wider strategic linkages needs to be clarified, such as the Estate in the north
- Tall buildings are designed to work at all distances (far, middle and close views). While the approach to massing and height are supported, the impact the proposed scale has on the liveability of residents and impact on wider setting needs to be considered.
- Welcome the fact that the scheme has two separate blocks. While they are taller than the local residential context, they have a positive relationship to each other and their siting.

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 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.

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
- D11 Safety, Security and Resilience to Emergency
- D12 Fire Safety
- D13 Agent of Change
- 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 (*)

H11	Build to Rent
HC1	Heritage Conservation and Growth
G1	Green Infrastructure
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodlands
S1	Developing London's Social Infrastructure
S4	Play and Informal Recreation
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI 4	Managing heat risk
SI5	Water infrastructure
SI6	Digital Connectivity 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 – Overview

- 8.3 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 (2021), it is noted that these documents do in places supersede the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan.

Local Plan – Core Strategy (2010)

- 8.4 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.
- 8.5 The following local plan Core Strategy policies are considered particularly relevant:

CP 1:	Strategic Growth Areas
CP 2:	Housing Supply and Locations for New Homes
CP 3:	Affordable Housing
CP 4:	Housing Quality
CP 5:	Housing Types
CP 9:	Supporting Community Cohesion
CP 17:	Town Centres
CP 20:	Sustainable Energy Use and Energy Infrastructure

CP 21:	Delivering Sustainable Water Supply, Drainage Sewerage Infrastructure
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 34:	Parks, Playing Fields and Other Open Spaces
CP 36:	Biodiversity
CP 44:	North Circular Area
CP 45:	New Southgate

Local Plan - Development Management Document (2014)

8.6 The Council's Development Management Document (DMD) provides further detail and standard based policies by which planning applications should be determined. Policies in the DMD support the delivery of the Core Strategy.

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

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

DMD 71:	Protection and Enhancement of Open Space
DMD 72:	Open Space Provision
DMD 73:	Child Play Space
DMD 76:	Wildlife Corridors
DMD 77:	Green Chains
DMD 78:	Nature Conservation
DMD 79:	Ecological Enhancements
DMD 80:	Trees on Development Sites
DMD 81:	Landscaping

North Circular Area Action Plan

- 8.8 The North Circular Area Action Plan (NCAAP) sets out a planning framework for the sets out a planning framework for the future of the North Circular corridor between the A109 at Bounds Green and the A10 Great Cambridge Road. The adopted NCAAP forms an integral part of the Local Plan, sitting alongside the adopted Core Strategy (2010), the adopted New Southgate Masterplan (2010), the adopted Development Management Document (DMD, (2014), and other area based plans being prepared for Enfield's strategic growth and regeneration areas. The NCAAP provides more detailed and area-specific policy and framework for this part of the borough. New development proposals coming forward within the area are expected to accord with the policies and proposals unless other material planning considerations indicate otherwise. Of particular relevance to this application are policies NC Policies 2,5, 6, 9, 10, 12 and 17 which are summarised as follows:
- 8.9 NC Policy 2 'New and Refurbished Homes' identifies 20 sites within the NCAAP area which have the potential to deliver approximately 1,400 new homes within the plan period up to 2026.
- 8.10 NC Policy 5 'Provision of Modern Healthcare Facilities' states that development of 10 residential units or more will be expected to contribute towards the provision of health facilities within the NCAAP area, and financial contributions will be calculated using the NHS Healthy Urban Development Unit Model.
- 8.11 NC Policy 6 'High Quality Design of New Development' states that new development within the NCAAP area will be high quality and design led...taking careful account of urban context and reinforcing local distinctiveness. Of particular importance is that new developments on sites along the North Circular Road must address the road directly with doors, windows and balconies and appropriate boundary treatment which responds positively to the route and treats it as a 'front'.
- 8.12 NC Policy 9 'Environmental Mitigation – Air Quality and Noise Pollution' notes that in relation to air quality the design of new developments and their associated landscaping proposals can significantly help in the mitigation of environmental problems such as air and noise pollution.
- 8.13 NC Policy 10: Open Spaces states that new development should make appropriate contributions to improving the quality of the existing open space network across the NCAAP area.
- 8.14 NC Policy 12: Sets key Principles to guide change in the New Southgate / Arnos Grove neighbourhood place include: 1. Development sites – including The Western Gateway sites; 2. Townscape – development heights and forms to respect local character and context; 3. Activities – development will generally be housing led; 6. Infrastructure – the significant planned residential grown must be supported by appropriate contributions.

- 8.15 NC Policy 14 (Western Gateway – Site Numbers 2, 3 and 4) sets out that the site has the potential to create a landmark development at this key gateway into the Borough. This would include the highest architectural quality on this most prominent site and a mixed-use redevelopment including housing, commercial space, community facilities, leisure and retail development. The gas holder site presents the opportunity for a taller building of up to 10 storeys. Station Road should be enhanced to provide an improved environment less dominated by cars and more conducive to a high-quality living environment. There is an opportunity to deliver a new neighbourhood square which could create a new focal point for the development with new and enhanced links to other public open spaces. The site has the capacity to deliver between 200 and 360 new dwellings of mixed tenure and size. Best located adjacent to the railway embankment, there is potential for approximately 3,500 sq.m of new commercial floorspace. Additionally, 500 sq.m of flexible space which could be occupied by small local shops to serve this new community.

Enfield Draft New Local Plan

- 8.16 Work on a New Enfield Local Plan has commenced so the Council can proactively plan for appropriate sustainable growth, in line with the Mayor of London's "good growth" agenda, up to 2041. The Enfield New Local Plan will establish the planning framework that can take the Council beyond projected levels of growth alongside key infrastructure investment.
- 8.17 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.
- 8.18 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.
- 8.19 Key emerging policies from the plan are listed below:
- Policy DM SE2 – Sustainable design and construction
 - Policy DM SE4 – Reducing energy demand
 - Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
 - Policy DM SE7 – Climate change adaptation and managing heat risk
 - Policy DM SE8 – Managing flood risk
 - Policy DM SE10 – Sustainable drainage systems
 - Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
 - Policy DM BG8 – Urban greening and biophilic principles
 - Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment

Policy DM DE2 – Design process and design review panel

Policy DM DE7 – Creating liveable, inclusive and quality public realm

Policy DM DE10: Conserving and enhancing heritage assets

Policy DM DE11 – Landscape design

Policy DM DE13 – Housing standards and design

Policy DM H2 – Affordable housing

Policy DM H3 – Housing mix and type

Policy DM T2 – Making active travel the natural choice

Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

National Planning Policy Framework (2021)

- 8.20 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.
- 8.21 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.
- 8.22 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.

- 8.23 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

National Planning Practice Guidance (NPPG)

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

Other Material Considerations and guidance

- 8.25 The following guidance is also considered particularly relevant:

Enfield Climate Action Plan (2020)
Enfield Housing and Growth Strategy (2020)
Enfield Intermediate Housing Policy (2020)
New Southgate Masterplan (2010)
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 Design Guide (2019)

Housing Delivery Test and Presumption in Favour of Sustainable Development

- 8.26 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.

- 8.27 Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.”8.28 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.
- 8.29 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.
- 8.30 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.
- 8.31 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.
- 8.32 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.

9 ANALYSIS

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

- Principle of Development (Land Use)
- Housing Need and Delivery
- Optimising site capacity
- Housing Mix
- Residential Quality and Amenity
- Design
- Heritage
- Neighbouring Amenity
- Transport
- Trees and Landscaping
- Water Resources, Flood Risk and Drainage
- Environmental Considerations
- Site Waste Management
- Contaminated Land
- Air Quality / Pollution
- Health
- Fire Safety
- Community Infrastructure Levy and S106

9.2 Principle of Development (Land Use)

- 9.2.1 In terms of the overarching principle of development 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.
- 9.2.2 Additionally, the aim is that planning should facilitate the delivery of sustainable development. This is achieved by ensuring that the right development is built on the right land; that development helps to support communities with sufficient homes, accessible services, and open spaces; and development protects and where appropriate, enhances the natural, built and historic environment.
- 9.2.3 Paragraph 8 of the NPPF sets out three overarching objectives, in order to achieve sustainable development. These objectives are interdependent and need to be pursued in mutually supportive ways and include the following (with detail provided on the most relevant objective to this section): a) an economic objective; b) a social objective; and, c) an environmental objective –to contribute to protecting and enhancing our natural, built and historic environment.
- 9.2.4 With regards to the existing land use, it is noted that the NPPF (Para. 120) advocates the promotion of and support for the development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.

- 9.2.5 Furthermore, Paragraph 1.2.5 of the London Plan states that ‘all options for using the city’s land more effectively will need to be explored as London’s growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London’. In particular, Policy GG2 requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield land and delivering additional homes.

Comprehensive Redevelopment

- 9.2.6 The scheme proposes the redevelopment of the site, which is currently vacant having previously housed the redundant gas holder, which was recently demolished. The site has been cleared and the land remediated. It currently serves no architectural interest to the area.
- 9.2.7 The site is situated within the New Southgate Place shaping area and is also within the North Circular Area Action Plan Area (2014) and New Southgate Masterplan (2010). The potential for development was set out in adopted Enfield development plan policy – specifically, within the North Circular Area Action Plan (2014). Additionally, the London Plan identifies the site as being located within the New Southgate Opportunity Area, which seeks the delivery of 2,500 new homes and 3,000 new jobs.
- 9.2.8 The site is identified as an ‘opportunity site’ within the North Circular Area Action Plan (NCAAP), within NC Policy 2 (Opportunity Site 2/3).
- 9.2.9 NC Policy 12 also sets out that the site has potential to be released for redevelopment. The principle of development on this site is therefore supported. NC Policy 12 Arnos Grove/New Southgate states that the Western Gateway development site has the potential to deliver a mix of uses including new high-quality housing, employment uses, community facilities and retail development. Furthermore, the Ladderswood and Western Gateway areas are considered appropriate for tall buildings with development heights and forms elsewhere needing to respect local character and context. NC Policy 14 also specifically refers to the aims and intentions of the redevelopment of the Western Gateway sites, this includes the Gas Holder, sites 2 and 3.
- 9.2.10 The policy provides indicative housing numbers and design options, which have been assessed in this report in the context of present-day considerations, adopted and emerging policies and other material considerations. The NCAAP targets of 200-360 new dwellings across the Western Gateway sites pre-dates the current adopted London Plan (2020) and subsequent housing targets.
- 9.2.11 This area is also identified as a place shaping priority area / regeneration priority area. Core Policy 44 ‘North Circular Area’, and Core Policy 45 ‘New Southgate’ are relevant policy considerations. Enfield adopted Core Strategy (2010) Core Policy 44 North Circular Area states that the Council will promote housing improvements and investments. It recognises that housing estimates may need to be revised following further detailed work as part of the AAP and New Southgate Masterplan. The NCAAP indicates new development will be expected to cross-fund environmental improvements in the area such as landscaping and tree planting. Core Policy 45 New Southgate sets out the objectives for this place shaping priority area. It indicates that a holistic integrated approach should be taken to development and that street based urban design solutions should be employed.
- 9.2.12 Objections have been raised stating that the proposals are in conflict with the local plan. However, Policies 12 and 14 of the NCAAP established that the site

has potential to be released for redevelopment. Furthermore, the adopted SPD “New Southgate Masterplan” identifies the aims and objectives for the Western Gateway to provide a landmark residential development of new apartment blocks and houses together with a new public square, a few small local shops, cafes/restaurants and light industrial units. In particular, the Masterplan identifies that approximately 112 new homes could be accommodated on the gasholder site with a high-quality landmark gateway to the Borough and small-scale retail (Class A1-A4) uses of around 500 sq. m could be located at ground level along Station Road. Retail development (Class A1 use) should be limited to around 500 sq. m across both the Gasholder and Homebase sites.

- 9.2.13 While a comprehensive approach to the entire Western Gateway site, would be preferred, this scheme in isolation does not prevent further development coming forward nor does it prevent this scheme be amended prior to implementation if those discussions progress. In this instances, the development of this site in isolation is not considered. In this respect therefore, the principle of the redevelopment of the site is deemed acceptable, having regard to policies CP44 and CP45 of the Core Strategy and the aims and intentions outlined within the adopted North Circular Area Action Plan (2014) and the New Southgate Masterplan (December 2010).

Residential Use

- 9.2.14 The benefits of delivering housing on an underutilised brownfield site in a very accessible location (within close proximity to overground/underground stations, the North Circular Road (A406) and a bus stop to the front of the site), has strong planning policy support and should be afforded substantial weight in the determination of the application.
- 9.2.15 With specific regard to the residential element of the proposal, it was noted that the NPPF sets out the government’s objective to boost the supply of homes. The NPPF also states an intention to ensure that supply meets the needs of different groups in the community, including an affordable housing need. Policy GG4 of the London Plan supports this intention, stating that planning and development must ‘ensure that more homes are delivered’.
- 9.2.16 At a regional level, Policy H1 of the London Plan highlights the importance of encouraging residential development on appropriate windfall sites, especially where they have a high PTAL rating (ratings 3 to 6) or are located within 800m of a tube station. The Council’s Core Strategy (4.1 Spatial Strategy), identifies that sustainable locations for development would be concentrated in town centres, on previously developed land and that new homes will be planned through the intensification of land uses. It was noted, however, that this site is not in fact a windfall site as it has been identified for redevelopment within the Core Strategy and the adopted North Circular Area Action Plan (2014) and New Southgate Masterplan (December 2010), which together provide a stronger emphasis on its potential redevelopment.
- 9.2.17 Paragraphs 104 and 105 of the NPPF outlines the objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport, and requires development be focused on locations which are sustainable and can offer a range of transport modalities to help reduce congestion and emissions and improve air quality and public health. The development site is in a highly accessible and sustainable location, within close proximity to both overground and underground station with a bus interchange immediately at the front of the site.
- 9.2.18 The proposal is for 182-residential units on a site where the adopted development has identified potential to introduce new housing (NCAAP). The

Borough's housing delivery targets have been set by the GLA and the Draft London Plan states that Enfield is required to provide a minimum of 12,460 homes over the next 10 years (1,246 per annum), in comparison to the previous target of 7,976 for the period 2015-2025.

- 9.2.19 According to the Enfield Housing Trajectory Report (2019), during the previous 7-years the Borough has delivered a total of 3,710 homes which equates to around 530 homes per annum. Furthermore, given the new target of 1,246 per annum the borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs, which is the case for this particular site.
- 9.2.20 The Council is currently updating its Local Plan and through publishing the Issues & Options (Regulation 18) has been transparent about the sheer scale of the growth challenge for Enfield. The published Regulation 18 document was clear about the need to plan differently to attain a significant step change in delivery and secure investment in our borough. The Council needs to encourage a variety of housing development including market and affordable to meet varied local demand.
- 9.2.21 In regard to national policy, the provision of housing on underutilised brownfield sites in highly accessible locations is in line with the NPPF principles in respect of sustainable development (social, economic and environmental). This approach is also in line with the adopted London Plan which supports the optimisation of underutilised and highly accessible brownfield sites. It is also aligned with a plan-led approach to directing density and scale to sites where new resident populations can most sustainably be supported.
- 9.2.22 In relation to sustainable development the proposal is considered to respond to the objectives of the NPPF by redeveloping a brownfield site; by providing homes that are highly accessible (close proximity to overground/underground and bus services) and easily accessible to local amenities; by providing a range of housing to support a mixed and balanced community; and by having due regard to the local natural, built and historic environment. It is also considered that the proposed number of residential units on the site would contribute to providing housing to assist in meeting the borough's housing target and help bridge the shortfall that has been the case in previous years.
- 9.2.23 As previously stated, in terms of national policy the provision of housing on underutilised brownfield sites in highly accessible locations, and to increase densities, is a key driver within the NPPF particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively. This approach is also in line with the London Plan's objectives to optimise underutilised brownfield sites.
- 9.2.24 At a regional level, Policy H1 of The London Plan advocates for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL rating of 3-6), and mixed-use redevelopment of car parks and public sector owned sites. This approach is also supported in the council's Issues and Options document which identifies the need to intensify development areas around key overground and underground rail stations. The document further identifies redeveloping underutilised and low-density land such as surface car parks whilst also recognising the need to 'genuinely commit to deliver sufficient new housing to address our needs', for example related to size and tenure.
- 9.2.25 Running alongside this is the high quantum of our Borough (around 40%) that is designated Green Belt, which results in specific challenges in terms of the provision of substantial development, such as the proposal under consideration here. As Policy G2 of The London Plan restricts development in the Green Belt in accordance with the NPPF, opportunities for the provision of housing are

restricted which means the utilisation of inefficiently used brownfield sites becomes a priority.

- 9.2.26 The existing site offers no architectural merit and its redevelopment would allow the provision of a highly attractive and good quality residential and commercial development alongside environmental improvements. These include noise, air quality and high-quality landscaping to an otherwise urban environment alongside the North Circular (A406).
- 9.2.27 Given the site is considered to be underutilised in terms of use and is in a well-connected transport node, Officers are satisfied that the redevelopment of this brownfield site has been appropriately justified in land use planning policy terms and is in accordance with the appropriate policies at a national, regional and local level.

Commercial Floorspace Provision

- 9.2.28 The New Southgate Masterplan states that the Gas Holder site could accommodate small scale retail uses (A1-A4) of up to 500 sq.m at ground floor level. The proposal seeks to provide a total of 371 sq.m of commercial floorspace within Use Class E. This would feature two commercial units, one at ground floor level serving each block at 280 sq.m and 91 sq.m. These would improve shopping provision within the Borough and in particular for new residents within both the proposed development and the adjacent Ladderswood development, which would be connected to this development by appropriate and improved links at Station Road.
- 9.2.29 Given the above considerations, the principle of development is thus considered to be acceptable and in line with relevant policies, most notably London Plan Policies GG2, GG4, H1 and H11, Core Strategy Policy 4.1 and advice contained within the NPPF. As such the Development is supported in principle terms subject to other material planning considerations as outlined below.

9.3 Housing need and delivery

- 9.3.1 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 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.
- 9.3.2 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.
- 9.3.3 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out

the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious draft London Plan targets.

- 9.3.4 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.
- 9.3.5 The fourth and fifth ambitions of the strategy are in respect of inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.
- 9.3.6 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the London Plan seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 9.3.7 As previously stated, 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.
- 9.3.8 Taking into account both the housing need of the borough together with the track record of delivery against target, it is clear that the council must seek to optimise development on brownfield sites, particularly those that are currently not being optimised.

Affordable Housing

- 9.3.9 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)". London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable with each site providing a minimum of 35% to comply with the threshold level of affordable housing
- 9.3.10 Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on site capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances, and the mix of affordable housing should reflect the need for larger family units, in accordance with policy CP5 of the Core Strategy. The Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision.

9.3.11 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).

Greater weight however will be given to Policy H6 of the London Plan which stipulates 30% low cost homes, 30% intermediate homes and 40% to be determined at a local level as either low cost rented homes or intermediate products

9.3.12 The Council will agree an appropriate figure, taking into consideration site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.

9.3.13 Policy DMD1 of the Development Management Document refers to affordable housing comprising three tenures: social rent, affordable rent, and intermediate housing. It states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need. Less than 1% of housing in the local area (Southgate Green ward) is intermediate housing.

Affordable housing delivery in Enfield

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

Assessment: Maximising affordable housing

9.3.15 The Applicant has submitted a viability assessment which was scrutinised by the Council's independent viability consultants. The Council's independent viability consultants concluded the scheme cannot support more than 30% affordable housing with a policy compliant tenure mix of 70% social rent and 30% intermediate rent. This equates to 55 units with a split of 17 intermediate rent and 38 social rent. The remaining 127 units would serve market housing. The split of affordable housing across both blocks within the development is currently unclear, however this matter will be resolved with the applicant and further details reported verbally at Planning Committee and secured through a S106 legal agreement. However, affordable housing will be pepper potted across the development

9.3.16 The Council's independent viability consultants challenged a number of assumptions and inputs into the financial appraisal of the scheme and held discussions with the Applicant regarding differences in site value benchmark, sales values, construction costs and developer profit. Additionally, the Council proposed further clarification of a more realistic alternative use value. Following these discussions, the Council's independent viability consultants concluded

that the scheme could not support more than 30% affordable housing on the basis of a policy compliant tenure mix.

- 9.3.17 Officers therefore consider that the scheme delivers the maximum reasonable amount of affordable housing in accordance with London Plan Policies H4 and H5, Enfield Core Strategy Policy 3 and Development Management Document Policy DMD1 that consider the specific nature of the site, development viability, grant and the need to achieve more balanced housing supply.
- 9.3.18 Officers consider that the affordable housing offer, including overall % and tenure represents the maximum reasonable amount of affordable housing deliverable – considering the specific context and character of the site and details of the scheme. Negotiations have taken account of the site's individual circumstances, in accordance with adopted London Plan Policy H5 and Enfield policy DMD1 in respect of affordable housing negotiations. This has included consideration of the provision for re-appraising the viability of the scheme prior to implementation (early and late stage viability reviews agreed) and other scheme requirements.
- 9.3.19 The details of the Affordable Housing offer will be captured via way of planning obligations. The Section 106 agreement will also contain review mechanisms (early and late), which will enable the Council to capture any uplift in value afforded to the site after planning permission has been granted.

9.4 Efficient use of land and optimising site capacity

- 9.4.1 Objections have been received that the proposals would result in overdevelopment and excessive density within the locality. Officers have assessed density and site capacity – and consider the proposals are aligned with adopted local and regional (London) policies and guidance in respect of density.
- 9.4.2 Officers have assessed that the proposal is aligned with requirements of the National Planning Policy Framework – that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and that planning decisions should promote and support the development of under-utilised land, including through the more effective use of car parks.
- 9.4.3 This is in addition to the applicant following a design-led response, in accordance with the preferred and London Plan approach to optimising site capacity.
- 9.4.4 The revised NPPF introduced Section 11 (Making Effective Use of Land). Paragraph 120 sets out 5 points planning decisions should consider in promoting the effective use of land. It supports 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.
- 9.4.5 Paragraph 120 parts (c) and (d) are particularly relevant, stating that planning decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

- 9.4.6 Paragraph 123 encourages that local authorities take a positive approach to applications for alternative uses, where land is currently developed but not allocated. Paragraphs 124 and 125 set out provisions for achieving appropriate densities – providing clear support for avoiding low densities in areas where there is existing or anticipated shortage of land for meeting identified housing needs. Paragraph 125(c) of the revised NPPF is relevant and states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies of the NPPF.
- 9.4.7 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).
- 9.4.8 Paragraph 124 of the NPPF states that in respect of development density, consideration should be given to whether a place is well designed and ‘the desirability of maintaining an area’s prevailing character and setting...or of promoting regeneration and change’.
- 9.4.9 Policy H10 of the London Plan (2021) promotes higher density development in locations with a good PTAL score and in close proximity to a local centre in order to ensure the most efficient use of land and to optimise the provision of housing. The London Plan incorporates a different approach to assessing density – advocating a design-led approach. London Plan Policy D3 does not follow a matrix approach providing indicative densities. It instead advocates for the best use of land by following a design-led approach that optimises the capacity of sites. Policy D2 of the London Plan (2021) states that development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels and be proportionate to the site’s connectivity and accessibility by walking, cycling and public transport to jobs and services (including both PTAL and access to local services).
- 9.4.10 Additionally, Policy D3 refers to optimisation of site capacity to provide a development that is the most appropriate form and land use for the site. It also states that development proposals should respond to form and layout, experience, quality and character. Furthermore, the policy details that density measures related to the residential population will be relevant for infrastructure provision and measures of density related to the built form and massing will inform its integration with the surrounding context.
- 9.4.11 The site has a forecast PTAL of 4 having regard to its siting on a main arterial route and within close proximity to underground/overground and a bus interchange context, it is concluded that the site has an Urban Character.
- 9.4.12 Policies CP4 and CP30 of the Core Strategy stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Local Plan Policy DMD37 calls for a design-led approach to ‘capitalising’ on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity. Policy DMD8 requires proposals be in an appropriate location and of a suitable scale, bulk and massing.
- 9.4.13 Policy DMD6 of the Development Management Document promotes density appropriate to the locality – in line with the previously superseded London Plan Policy 3.4 density matrix. Policy DMD8 which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing. In this instance the Proposed Development is located in an accessible location with a PTAL rating of 4, within close proximity to both underground/overground stations, a main arterial route (North Circular (A406) and a bus interchange at the front of

the station. Enfield Issues and Options (Regulation 18) document (Para. 2.4.1), acknowledges the need to 'exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities with this aim being a 'first principle' of the document and is indicative of the direction of travel.

- 9.4.14 The density matrix however this was never the sole test of site compatibility, which also incorporated a visual assessment, having regard to local character and context. The requirements of the recently adopted London Plan (2021) are outlined above alongside the adopted Enfield Local Plan policies. It is therefore concluded that having regard to the site's urban location and good accessibility to public transport as well as its optimum potential to provide a landmark building alongside this key arterial route (North Circular A406), officers conclude that the proposals are acceptable in density terms, having regard to the design-led London Plan Policies D2 and D3.
- 9.4.15 Enfield's Design Review Panel concluded, in their last review of the two building proposals that the height and scale were supported and appropriate for the surrounding context as the tower would serve a new landmark previously provided by the demolished Gas Holder..
- 9.4.16 Additionally, the GLA concluded within their report that the location of tall buildings on this site is supported by Enfield Council's local planning policies. Furthermore, the overall approach to the building height, massing and elevation treatments are supported, and both the design and residential quality are of a high standard. The development will cause less than substantial harm to heritage assets and conservation areas, but the public benefits, including affordable housing, must be confirmed before assessment can be carried out. These public benefits have now been confirmed and thus it can therefore be concluded that the GLA also support the proposals for the redevelopment of this site.
- 9.4.17 Furthermore, the Council's Urban Design officer, concluded that the testing of height, footprint, quality of dwellings and open space provision, as well as connectivity of the site, infrastructure and development potential has been considered to determine the quantum of the scheme and thus concluded that the proposed quantum was considered acceptable
- 9.4.18 The scheme, when assessed against adopted density policy, would not result in overdevelopment or excessive density. The scheme would result in a high-quality design, and well considered architecture and approach to the public realm, providing 182 residential units across the site. When considering the proposed density in the round alongside the site's good PTAL rating, its acceptable impact on residential amenity and its sufficient social infrastructure, it is considered that the scheme results in an appropriate level of development for the site. Further, the quantum of units proposed is acceptable in its specific local setting, subject to all other material planning considerations being met. In density terms the proposed development is in line with adopted policy both at local and regional level.

9.5 Housing mix

- 9.5.1 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 Southgate Green ward and GLA Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children.

9.5.2 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.

- 9.5.3 The proposed breakdown of the 182 residential units would comprise 71(1b2p 39%), 69 (2b4p (38%) and 42 (3b5p (23%).

9.5.4 The scheme would provide 30% affordable housing with a breakdown of 70% social rent and 30% intermediate rent. At this stage, details of the breakdown within each tower in regard to mix and tenure are not clear, however this will be clarified with the applicant and verbally reported at Planning Committee. Policy H6 of the London Plan stipulates 30% low cost homes, 30% intermediate homes and 40% to be determined at a local level as either low cost rented homes or intermediate products

- 9.5.5 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..

9.6 Residential Quality and Amenity

- 9.6.1 The NPPF (Para.12) identifies good design as a key aspect of sustainable development, stating that 'the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve'. The guidance states that developments should seek to:

Function well and add to the overall quality of the area for the lifetime of the development;

Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

Be sympathetic to local character and history;

Establish a strong sense of place and welcoming and distinctive places; and

Optimise the potential of the site to provide an appropriate mix and amount of development, green and public space, local facilities and transport networks;

Create safe, inclusive and accessible spaces with a high standard of amenity and where crime or fear of crime does not undermine community cohesion or quality of life.

- 9.6.2 Policy D6 of the London Plan outlines housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space. The Policy notes that design must not be detrimental to the amenity of surrounding housing. Table 3.1 sets out the internal minimum space standards for new developments and Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments.

- 9.6.3 Alongside this, policies D5 and D7 of the London Plan set out that new developments are required to support mixed and inclusive communities, which includes provision for wheelchair accessible and wheelchair adaptable units, as well as an environment that is welcoming and accessible by all.

Accessible Housing

- 9.6.4 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. Policy D7 of the London Plan sets out that in order to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that: i) at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. 10% of units in the scheme will be reserved as dedicated accessible homes in accordance with the Building Regulation 2010 requirement M4(3): "Wheelchair user dwellings". All other units will be designed in accordance with Building Regulation Standards M4(2), "Accessible and adaptable dwellings" to provide for other types of access needs and potential future requirements. The submitted details specify that a total of 59 units (32%) would be wheelchair adaptable with 33 in Tower A and 26 in Tower B. On that basis, the submitted details are considered acceptable in policy terms, and an appropriate condition would be attached to secure compliance.
- 9.6.5 Additionally, the Urban Design officer is supportive of the proposals as Part M4(3) Category 3 dwellings have been designed, and following officers' comments, have a more efficient layout with adequate clearances

Housing quality

- 9.6.6 All of the units either meet or exceed internal floorspace standards required by policy D6, Table 3.1 of the London Plan and comply with the qualitative design aspects to be addressed in housing developments required by Table 3.2. The Planning Statement confirms that all 182 units would meet or exceed Nationally Described Space Standards and would include sufficient private outdoor amenity space. The community spaces also include a range of external amenity opportunities.
- 9.6.7 A total area of communal amenity space at ground floor level equates to 1,832 sq.m including a new publicly accessible square at the upper ground floor level to the north and a terraced and stepped landscape positioned between the two buildings to connect the upper and lower ground levels and a well landscaped southern boundary to improve the relationship and environment with the North Circular (A406). In addition to the private amenity space at ground floor level, further amenity space provision would be incorporated into the design of the towers. Both Tower A and B would feature intermediary façade cut-out with balconies overlooking the base of each intermediary façade cut-out from the two storeys immediately above. Tower A would feature 3 cut outs at 5th, 11th and 17th floor levels. Tower B would feature 2 cut outs at 3rd and 8th floor levels. Roof terraces would also be provided with half of the roof area of each tower serving a common amenity while contributing to local play space provisions. Winter gardens would provide private amenity space to residential units.
- 9.6.8 The layout of residential lobbies and communal use has been developed in conversation with officers. The addendum shows an interior image, displaying the multiple levels and sense of openness brought by the double height space.
- 9.6.9 The plan form, besides addressing scale, massing and elevation design, contributes to an efficient and varied plan. The centrally located core with two corridors serving three flats manages privacy of residents efficiently. The kite-shaped plan has private balconies on the corners, giving broad views to residents. For the southern elevation, winter gardens are proposed which run

the length of it. This covers L/K/D and bedrooms, further adding to the noise/pollution buffer of the winter gardens.

- 9.6.10 This planform has led to a 95% dual aspect provision; this equates to 173 units. The 5% single aspect dwellings have arisen from introducing flats following the loss of floorspace to the cut-outs. These dwellings are also located to the south and have a double height balcony area. Considering the benefit of the cut-out and how the design and location of the single aspect dwellings has been considered, this 5% is considered acceptable. Within the constraints of the site this is considered to represent a high-quality response.
- 9.6.11 In terms of environmental performance, ADF levels are acceptable and overheating levels have been addressed by design revisions to the glazing of affected elevations.
- 9.6.12 Updated layouts showing clear segregated storage for use and boilers have been requested. Current layouts show potential areas where this can be delivered so it is not of concern to officers and can be resolved, by revisions, or an appropriate condition, where necessary.

Daylight/sunlight future occupiers

- 9.6.13 The submitted Daylight/Sunlight Assessment (December 2020) includes an analysis of whether the Proposed Development would receive adequate daylight/sunlight in the units and in public and communal amenity areas. The guidance outline three detailed methods for calculating daylight: the Vertical Sky Component (VSC), the No-Sky Line (NSL) and the Average Daylight Factor (ADF).
- 9.6.14 The assessment of daylight within the proposed units has demonstrated that the vast majority of rooms receive good levels in excess of the relevant BRE targets. The ADF results have shown that 99% of the rooms meet the daylight criteria, which is very high for a scheme of this scale and context. Where the few deviations occur, they are driven by overhanging balconies which limit the daylight potential of the rooms, in order to provide private amenity space for the tenants.
- 9.6.15 In regard to the sunlight assessment, 47% of main living spaces achieve the recommended targets for sunlight. This compliance is to be expected for a scheme of this size and scale and most sunlight deviations sunlight stem from the requirement to provide external balconies and to place a small number of living rooms in the northern elevation. It should be noted that where living rooms occur on the northern elements of the Towers, these have been made to be dual aspect to ensure as much sunlight as possible is achieved.

Overshadowing – Public and Communal Amenity Areas

- 9.6.16 In relation to overshadowing of amenity space within the Site, both public and communal areas were tested, and it was found that all proposed areas exceed the suggested (BRE guideline) target on 21st March. This means that the public and communal amenity areas will experience very good/ excellent levels of sunlight.
- 9.6.17 Given the above, it is concluded that future occupants of the Development will experience very good/ excellent levels of sunlight from the open spaces proposed within the site.
- 9.6.18 Overall, the expected level of amenity for future occupiers of the Site, as outlined above, is considered acceptable to further emphasise the high-quality environment in regard to amenity space and standards of accommodation.

Child Playspace and Amenity Space

- 9.6.19 Policies D6 and S4 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation noting the provision of play space should integrate with the public realm without compromising the amenity needs/enjoyment of other residents and encourage children to play.
- 9.6.20 The Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG sets a benchmark of 10 sq.m. of useable children's playspace to be provided per child, with particular emphasis on playspace for children under five years old to be provided on-site. Additionally, Policy S4 of the London Plan also recommends that at least 10 sq.m of playspace per child should be provided. In comparison, at a local level Policy DMD73 of the Development Management Document does not specify a specific amount of space per child, it sets out that developments with an estimated child occupancy of ten or more children will be required to incorporate on-site play provision to meet the needs arising from the development. Also, Policy DMD9 of the Development Management Document solely refers to amenity space within new developments.
- 9.6.21 The submitted Landscaping Masterplan confirms that appropriate amenity space would be provided, a total of 2,380 sq.m across the site. This would be provided at:
- Lower Ground Floor Level - Pump Track and Incidental Play
Podium/Upper Ground Floor – Gas Holder Park
Terrace Cut Out – Incidental and dedicated play space for younger years
Roof Terraces – Dedicated play spaces for children
- 9.6.22 In regard to children's play space, a total of 470 sq.m would be required and an oversupply of 792 sq.m has been provided. For example, dedicated space of 52 sq.m and 63 sq.m have been provided within the roof terraces of the towers. This is considered acceptable having regard to policies D6 and S4 of the London Plan and DMD73 of the Development Management Document as well as the guidance contained within the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.
- 9.6.23 With regards to landscape provision on the site and residential amenity space, each unit will have a private balcony that meets required size standards as stated in the London Plan.
- 9.6.24 The proposed external amenity space would equate to 2,380 sq.m and will include areas accessible to the public including the public square and will also include private shared amenity providing spaces for occupiers of the development. The proposed areas would be in line with Healthy Street objectives which seek to prioritise people over vehicles as it would incorporate a pump track and pedestrian and cycle paths.
- 9.6.25 Taking all of the above into consideration the Proposed Development is considered acceptable in terms of playspace, amenity space and landscape provision, having regard to policies DMD8, DMD9 and DMD73 of the Development Management Document, D6 and S4 of the London Plan as well as the guidance outlined within the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.

9.7 Design

- 9.7.1 The National Design Guidance sets out that well-designed places have ten key characteristics which work together to create its physical character and help to nurture and sustain a sense of community. The Guidance further states that

these 10-characteristics contribute towards the cross-cutting themes for good design set out in the NPPF. The ten characteristics are as follows:

Context – enhances the surroundings;
 Identity – attractive and distinctive;
 Built form – a coherent pattern of development;
 Movement – accessible and easy to move around;
 Nature – enhanced and optimised;
 Public spaces – safe, social and inclusive;
 Uses – mixed and integrated;
 Homes and buildings – functional, healthy and sustainable;
 Resources – efficient and resilient; and
 Lifespan – made to last.

- 9.7.2 Additionally, at regional level policies D3, D4, D5, D6, D8, D9, D14, S4, S6, G4 and G5 are relevant alongside local level policies CP30 of the Core Strategy and DMD8, DMD37, DMD39 and DMD43 of the Development Management Document.
- 9.7.3 Policy DMD43 of the DMD relates to tall buildings. It states that tall buildings will not be appropriate in sensitive locations such as green belts or conservation area. The site is not located within a sensitive location and thus the following criteria must be met:
- a. Provide a landmark signifying a civic function or location/area of importance and interest and/or add to the legibility of the area;
 - b. Provide adequate amenity space for all residential units;
 - c. Not have a negative impact on existing important and highly visible structures (including other tall buildings);
 - d. Take account of the cumulative impact of tall buildings (including consideration of extant permissions);
 - e. Exhibit high standards of sustainable design and construction and architectural quality, the latter to include consideration of scale, form, massing, proportion and silhouette, facing materials, night-time appearance and relationship to other structures with particular attention to the design of the base and top of the building;
 - f. Contribute to the physical and visual permeability of the site and wider area, aiding legibility and movement;
 - g. Contribute positively to the public realm through the relationship to the surrounding environment and, where appropriate, through the provision of high quality public space;
 - h. Not harm the amenity of properties in the vicinity through shadowing and overlooking.
- 9.7.4 Heritage and character have been proactively considered and influenced the high-quality design and placemaking benefits of the proposal. The proposal has been subject to extensive pre-application engagement, two independent design review processes and public consultation.
- 9.7.5 Historic England and Enfield's Conservation Officers have raised no concerns about the proposed development. Enfield's Urban Design Officers and the Greater London Authority are supportive of the design merits of the scheme.
- 9.7.6 The scheme is a high-quality well considered architectural response on a challenging site. It proposes significant enhancements, which would benefit future and existing residents – including public realm enhancements.

Layout and introduction of non-residential uses and frontages

- 9.7.7 The scheme has undergone a very productive and collaborative preapplication process, including two Design Review Panels, that identified the constraints and opportunities of the site and its potential in unlocking the site for a gateway development.
- 9.7.8 In this process, defining the number of buildings and impact on layout were rigorously tested, leading to the current two-tower with podium option.
- 9.7.9 The siting of buildings has considered a clear separation between the harsh southern frontage of the North Circular and eastern Station Road, setting landscaping buffers. In between the buildings, a varied landscape with play areas, rises to a podium garden that is open to residents and visitors. This podium serves as the parking accessed below ground.
- 9.7.10 Cycle storage is located at convenient locations throughout the development for both visitors and residents. Cycle storage is not centralised but located in multiple floors, facilitating ease of access.
- 9.7.11 Scheme layout, uses and active frontages are considered to successfully respond to policy objectives set out at Enfield's Core Strategy (2010) Core Policy 45 (New Southgate) in respect of place shaping within this priority area. Taking a holistic and integrated approach to development, including street based urban design solutions such as the delivery of a new square. The location of lobby entrances and commercial space frontage has been arranged to set a clear public frontage to the North Circular and a more private areas to the rear, where residential lobbies at podium level are accessed. Further detail to them could be secured by an appropriate condition. Furthermore, how this podium is tied to the higher level to the rear of the site, and with the emerging masterplan to the north, has been considered and would inform future development. The commercial space at ground floor have been sited to present new frontages to the North Circular and Station Road, capitalising on new linkages to the site and activity within the development and the wider emerging masterplan. The quality of internal space, mezzanine areas and double height space will provide with a distinct frontage to the towers and offer varied occupancy potential for commercial users.
- 9.7.12 Additionally, the DRP welcomed the use of the NCAAP indicative masterplan to inform the siting of the scheme and conclude that the scheme links well to the street leading up to Arnos Grove Station, along the North Circular and Bounds Green. In terms of wider linages, the location of the stair/ramp access to the podium from Station Road coincides with Palmers Road which leads to Arnos Grove.
- 9.7.13 The applicant has engaged with Secure by Design officers and concerns have been addressed within the proposed scheme and an appropriate condition could be attached to secure implementation.

Scale, height and massing

- 9.7.14 The London Plan advises that while high density does not need to imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing necessary future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. It is also considered that tall buildings that are of exemplary architectural quality and in the right place, can make a positive contribution to London's cityscape. Many tall buildings have become a valued

part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor-quality design.

- 9.7.15 Additionally, the Report on Location of Tall Buildings and Important Local Views in Enfield (2012) prepared in support of the current Core Strategy states within the general considerations: 'As a general rule buildings significantly taller than their surroundings are unlikely to be appropriate within or in close proximity to conservation areas, historic parks and gardens, listed buildings and ancient monuments
- 9.7.16 Policy D9 of the London Plan states that boroughs should determine through their local plan if there are locations where tall buildings may be appropriate and proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Tall buildings should only be developed in locations that are identified as suitable in Development Plans.
- 9.7.17 The current development plan for the Borough does not identify suitable locations for tall buildings pursuant to the requirements of London Plan Policy D9. However, it can be noted that the Council's Southgate Masterplan and North Circular Area Action Plan are supportive of the redevelopment of the Western Gateway and identify that the site could accommodate 112 new homes and a taller landmark building of 10 storeys. This document has material weight; however it should also be noted that this was adopted in March 2011 and thus policy has evolved dramatically since this date, alongside a substantial increase to Enfield housing targets. As a result, greater flexibility needs to be given to emerging policies with a greater emphasis placed on increasing height at the correct location. The mass and height of buildings on the Montmorency Park development are also important in this context
- 9.7.18 At a local level, policy DMD43 (Tall Buildings) is a criteria-based policy for considering tall buildings, which justifying text (para. 6.4.1) defines as those "that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor." It states that tall buildings will not be acceptable in areas classified as inappropriate which includes sites in the immediate vicinity of conservation area unless it can be demonstrated how the proposal avoids the negative impacts associated with the sensitive classification
- 9.7.19 Both the London Plan and DMD tall building policies are relevant to the proposed development. The policies can be distilled into two questions:
 - i) is the proposal in the right location,
 - ii) is it of high quality?
- 9.7.20 Acceptability of a taller building in a particular location would be dependent on the detailed local context including the design of the building, the relationship to neighbouring properties, the relationship with any heritage assets and the impact on any views including those to and from historic buildings over a wide area. This requires careful consideration should be given to the potential negative impact that the introduction of a taller building might have. As always, it is necessary to assess and evaluate the merits of individual proposals and exceptionally it may be possible for an applicant to demonstrate that an exemplary designed taller building is acceptable within or close to nationally or locally designated heritage assets.

- 9.7.21 An extensive assessment of the impact of tall buildings and the suitability of their design, mindful of strategic development potential and impact on setting, listed assets and Conservation Areas in Enfield and adjacent boroughs, has been a key consideration of the design development.
- 9.7.22 Furthermore, a clear story difference between the two towers, as well as distance between the towers and rotation of the planform, were defined early in the design development to establish a clear gateway tower and a shorter building that, when seen in multiple vantage points, reduce coalescing and minimise impact on sensitive settings.
- 9.7.23 As a design innovation which arose from the site's constraints, quantum and open space requirement, cut-outs were introduced across the two towers at various points. These cut-outs further break the massing and add to the distinct silhouette of the two towers, enhancing their design quality. They provide a unique combination of distinction with generosity of open space with very high sustainable and architectural design quality.
- 9.7.24 The cut-out and high-level setbacks, coupled with the concrete exoskeleton and clay tiling, lessens the impact of the tall buildings on the sensitive setting of Friern Village Park and Broomfield Park through its design.
- 9.7.25 This approach to tall building design and open space provision is the most innovative contribution of the scheme. This elevates the scheme from being a conventional residential tall building development into a progressive and ground-breaking one befitting its gateway location and setting a high design bar for future development in the area.
- 9.7.26 Additionally, Enfield's Design Review Panel supported the massing and height and stated that the site can be described as being close to large chunks of city infrastructure, such as the railway, major road, overhead bridge, industrial sheds etc, all giving this place a capacity to accept big objects. The now demolished gas holder was a local landmark, which the Panel envisage the proposed two buildings can effectively replace as local landmarks and although they were taller than the local residential context, they had a positive relationship to each other.

Articulation and Materials

- 9.7.27 As well as the importance of height differentiations and carefully varied massing in the Development, high-quality architectural articulation, materiality and elevational treatment is essential. The architectural approach can help integrate a development into its context through careful use of articulation, proportions, materials and elevational treatment, helping to give a building an identity. As such, this element of the proposal has been the subject of significant discussion between the Council and the applicants during pre-application stage and during the live submission, resulting in refinements to the design.
- 9.7.28 The elevational design confidently presents an interplay of grids by the exoskeleton, glazing, balcony and winter gardens and the animation of these from the residents.
- 9.7.29 The building does not attempt to replicate a gas holder literally, instead, focuses in delivering high quality accommodation and an exemplar tall building design which introduces order and differentiation via its planform, silhouette and material variation. Perceived references to the gas holder in terms of scale, appearance and silhouette do not come at the expense of residential quality, but from a sensitive assessment of context and how tall buildings would densify it.

- 9.7.30 The proposed exoskeleton defines a strong presence which is seen from close, mid and long views. This grid is continuous at the cut-out, reinforcing the silhouette across multiple viewpoints. At roof level, the setback and extending exoskeleton result in a distinct crown feature that positively engages with sensitive settings.
- 9.7.31 The choice of clay tiling to complement the concrete exoskeleton introduces a textural variety which is perceived at close and mid view. Furthermore, the sheen of the glazing of the tile and the proposed zig-zag profile, will refract daylight, offering variety in multiple viewpoints. The kite-shaped planform further introduces a varied massing. The elevational design has focused in reducing any sense of monotony and overbearingness brought by the building's scale, which is further lessened by the massing approach.
- 9.7.32 The design and use of the private amenity space and resident's occupancy will further add to the variety in elevation with the sliding windows, drawn curtains and winter gardens. This will lead to a dynamic building befitting its gateway location.
- 9.7.33 The two towers have contrasting material which further establishes a distinction between each. The lighter tone is favoured for the tallest building which, for long views, reduces the impact of the building on sensitive settings.
- 9.7.34 It is therefore concluded that the requirements of policy DMD43 have been met in terms of high quality of architectural design. Indeed, this proposal is a confident display of tall building design and introduces singular innovations which are at the vanguard of sustainable and biophilic design.
- 9.7.35 The proposed development is thus considered to meet all of the characteristics set out above to a degree, and in doing so creates a unique and distinctive development which would integrate appropriately and provide a landmark element in accordance with adopted local level policies, including the aims and intentions outlined within the NCAAP. It achieves this by the use of thoughtfully designed and positioned buildings, well considered public realm and relevant and needed uses within the buildings. The overall design has been well conceived on the basis of a clear design vision and being mindful of local character, history and landscape. This results in a development which provides a visually interesting and well-considered built intervention to the local area, as well as providing a much-needed upgrade to the public realm at the North Circular including a public square.
- 9.7.36 Officers therefore conclude that the proposal would result in a high-quality scheme, which would enhance the public realm, whilst making a meaningful contribution towards the Borough's housing targets. The scheme is assessed to be a well-designed scheme which would be located in a sustainable location.

Landscaping and Microclimate

- 9.7.31 A Landscaping Masterplan and Sustainability Statement (December 2020) was submitted as part of the planning documents.
- 9.7.32 Officers consider that the landscape design has made a clear and refined reference to the gas holder by introducing markers in a radial arrangement.
- 9.7.33 The applicant, following discussions with officers, updated the location of the towers and rotation, to allow for the retention of existing mature trees to the south. This was essential due to the harsh setting of the North Circular and the need to establish a landscape buffer, which, besides amenity gain, also provides pollution and noise screening. This retention is complemented by new tree planting of approximately 50 trees.

- 9.7.34 The Sustainable Drainage (SuDS) techniques, podium gardens and ramp landscaping in between blocks, all provide varied landscape that provides amenity, place for dwelling, play spaces across ages. A bike pump track is located closer to the North Circular, however, protected by tree line and its layout.
- 9.7.35 The submitted Sustainability Statement also refers to microclimate and concludes that the results of the microclimate assessment demonstrate that no major adverse effects are anticipated in the proposed and cumulative scenarios for ground level receptors in close proximity and within the site. The vast majority of receptors on areas around and within the site at ground level demonstrate a beneficial or negligible impact upon the existing wind conditions when compared to their intended use.
- 9.7.36 Following discussions with the Councils Urban Design officer, it was considered that the microclimate results in terms of daylight/sunlight and wind comfort for areas on the ground floor are compliant to BRE, London Plan and DMD policies. Mitigation is provided by the tree and landscaping.
- 9.7.37 Additionally, for private communal amenity spaces at higher level, the cut-outs provide a variety of open space residents which are further protected from noise, pollution and offer closer to the doorstep amenity for residents. This provision allows the scheme to meet its open and play space requirements in line with London Plan policies.
- 9.7.38 This also increases surface area that maximises on potential for greening, resulting in an UGF of 0.442.
- 9.7.39 At rooftop level, further amenity is provided for residents and adequately protected by balustrade and landscaping design to give a protecting perimeter from the edge.
- 9.7.40 However, officers consider that microclimate results for open spaces at high-level confirm the need for mitigation. Further design modelling on this was requested as an Addendum to confirm the feasibility of mitigation to achieve adequate comfort levels at high-level. The information was reviewed by the Urban Design officer and considered to be acceptable.

9.8 Impact on Heritage Assets

- 9.8.1 There is a statutory duty on decision makers to ensure the special interest of a listed building is properly considered as a material consideration when determining an application affecting its special interest or setting. Several heritage assets (designated and non-designated) are located within the vicinity of the Application Site. These are the art deco Arnos Grove Underground Station (Grade II* listed) of 1932 by Sir Charles Holden and the 1935-39 near-contemporary Bowes Road Library and Arnos Pool (Grade II listed building); and further away from the site, the potential impacts on the 16th century Broomfield Park and Broomfield House (Grade II*) were also considered. The Park contained a house, now in a near-ruined state after fire damage (along with the east wall with attached garden house and stable block), and set among a group of other listed structures (most at Grade II) and within its historic garden and parkland, now a public park, registered at Grade II. Additionally, given the scale of the proposed development, regard was given to surrounding heritage assets in the neighbouring London Boroughs of Barnet and Haringey. Following appropriate consultations, no objections were received from the London Borough of Haringey, however no comments were received from the London Borough of Barnet.
- 9.8.2 In respect of listed buildings, the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 requires that all planning decisions 'should have

special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The Act places a statutory duty on decision makers to ensure the special interest of a listed building is properly taken into account as a material consideration when determining an application affecting its special interest or setting. If harm is identified, it should be given considerable importance and weight in any planning balance. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 9, refer to setting. Setting of a heritage asset is defined in the NPPF glossary as "*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*".

- 9.8.3 The NPPF (2021) states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Chapter 16 of the Revised NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. It also encourages LPAs to take account of a non-designated heritage asset in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm.
- 9.8.4 Paragraph 192 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. 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. The significance of Broomfield House and Park is set out in the adopted Broomfield House Conservation Management Plan (June 2016).
- 9.8.5 Paragraphs 195 to 197 of the NPPF provide that in determining planning applications, local planning authorities should take account of: a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b. the 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.
- 9.8.6 Paragraph 199 states that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.
- 9.8.7 Paragraph 200 states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

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

- 9.8.8 Paragraph 201 of the NPPF deals with substantial harm to or total loss of significance of a designated heritage asset. Paragraph 202 of the NPPF provides that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Paragraph 203 of the NPPF deals with non-designated heritage assets stating that the ‘effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.
- 9.8.9 Paragraph 206 of the Revised NPPF states that Local planning authorities should look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 9.8.10 London Plan Policy HC1 ‘Heritage conservation and growth’ state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Core Policy 31 (Built and Landscape Heritage) requires that special regard be had to the impacts of development on heritage assets and their settings, Enfield Core Policy 30 supports high-quality and design-led public realm. DMD 44 (Preserving and Enhancing Heritage Assets) requires that developments should conserve and enhance the special interest, significance or setting of a heritage asset. DMD 37 (Achieving High Quality and Design-Led Development) requires that Development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.
- 9.8.11 Historic Environment Good Practice Advice in Planning Note 3 provides information on good practice in relation to assessing impacts on the setting of heritage assets. Of note in the GPA is the inclusion of the consideration of views and whether there would be any impact to the significance of the views on the heritage asset as a result of the development. However, it is of note that a distinction is made between views that contribute to heritage significance and those valued for other reasons.
- 9.8.12 Historic England guidance entitled The Setting of Heritage Assets, 2015 states: “Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building’s original designed landscape or the removal of structures impairing views of a building.” [p.4].
- 9.8.13 Historic England stated that both proposed buildings would be visible in the view south down Palmers Road from within the vicinity of Arnos Grove Underground Station, but not in any views towards the station. The view makes little or no

direct contribution to the setting of the station. In any case, given the loss of the gasholder that historically focused the view down Palmers Road, and the view that would be available of the adjacent extant approval, the change constituted by the proposal would cause no harm to the setting of the station.

- 9.8.14 Additionally, it was concluded that, the proposed buildings would bring no meaningful change to the setting of Alexandra Palace (Grade II) or the surrounding registered Park, from where the view, due to the elevated position, would minimise the tower's prominence in the general townscape. In contrast, in views across the long Italianate frontage of the former Friern Hospital (Colney Hatch), an asylum of the 1850s notable for the evolution in treatment of mental disorders, which stands in London Borough of Barnet, the proposed 19-storey tower would be visible above the otherwise unbroken roofline. This would visually disrupt the balanced composition of pavilions and central dome set in a simple horizontal roofline. The effect would be to cause less than substantial harm to architectural interest by compromising its appreciation.
- 9.8.15 Historic England considered that the proposals would have a marginal presence in the setting of parkland element of the park, the former parkland grounds of Broomfield House. The submitted Heritage Statement and views showed the results of testing a variety of views around the park and garden, both views identified as significant in the current Conservation Management Plan for Broomfield Park and House (June 2016) and views orientated to illustrate maximum exposure to the proposed development. It was noted that the tower would be visible from various points in the parkland area, particularly its northern parts, but would be perceived alongside both the consented adjacent development and other, older nearby tall buildings, forming a sort of cluster. The most significant views from this area of the Park would be across suburban development towards Alexandra Palace and central London beyond, and in these views the proposed development would be in the western periphery, a landmark within a small cluster. The change they would bring to the Park's setting would not be harmful to the Park's significant qualities of character. In other views around the edge of the walled garden and from southern and eastern parts of the Park, views of the proposed development are likely to be screened by trees or other structures including the houses around the Park's edges and so would cause no notable change to the Park's setting.
- 9.8.16 Visibility of the proposed development would be limited from the vicinity of the house and its east wall and former stables - all Grade-II* listed - other associated structures listed at Grade II, and from the within the historic walled garden and ponds which provide the house with a distinctive setting within the Park. Other existing developments would already be visible beyond the nearby suburban development in these views, and though the proposed development would appear prominent among them, potential visibility from the northern area of the ponds and from the lawns west of the house looks likely to be limited by the screening of trees and other structures. In general, this larger-scale development in the background of the setting of the house does not visually compete with the house in close views that reveal its architectural interest nor confuse appreciation of its historic setting through undue prominence. The proposed development is unlikely to cause harm to the setting of the house and its close setting within the Park.
- 9.8.17 Historic England therefore concluded that the proposed development was unlikely to cause harm to the significance of the heritage assets of the highest grade of protection in the vicinity-namely, Arnos Grove Station and Broomfield House and Park. However, it is clear that the proposals will cause less than substantial harm to the significance of the Grade II listed former Friern Hospital, having regard to the guidance contained within the NPPF, the Planning Listed Buildings and Conservation Areas) Act (1990), the Historic Environment Good

Practice Advice in Planning Note 3-The Setting of Heritage Assets (2017) alongside policies HC1 of the London Plan, CP31 of the Core Strategy and DMD37 and DMD44 of the London Plan.

- 9.8.18 The Council's Conservation Officer considered a detailed Heritage Statement and additional views in regard to consider impact on a variety of Enfield's heritage assets referred to above, and it was concluded that no harm would be provided to heritage assets aside from that identified to the former Friern Hospital. It was also considered that the impact on Broomfield Park would be neutral and would cause less than substantial harm to the former Friern Barnet Asylum. As such, taking account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, paragraph 134 of the NPPF, the identified harm to heritage assets has been given significant weight and a balancing exercise against public benefit is required. The public benefits that the scheme would deliver include appropriate affordable housing and high quality residential and commercial development on a brownfield site, having regard to the guidance contained within the NPPF, the Planning (Listed Buildings and Conservation Areas) Act (1990), the Historic Environment Good Practice Advice in Planning Note 3-The Setting of Heritage Assets (2017) alongside policies HC1 of the London Plan, CP31 of the Core Strategy and DMD37 and DMD44 of the London Plan and the Council's Heritage Strategy 2019-2024 (July 2019).

9.9 Neighbouring Amenity Considerations

- 9.9.1 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.

BRE Guidance - Daylight and Sunlight to Existing Buildings:

- 9.9.2 In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.
- 9.9.3 BRE Guidelines paragraph 1.1 states: "People expect good natural lighting in their homes and in a wide range of non-habitable buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by". Paragraph 1.6 states: "The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design..."
- 9.9.4 The submitted Daylight/Sunlight Assessment (December 2020) includes an analysis of whether daylight/sunlight to neighbouring properties would be

impacted by the proposed development. The guidance outline three detailed methods for calculating daylight: the Vertical Sky Component (VSC), the No-Sky Line (NSL), the Average Daylight Factor (ADF) and the Annual Probable Sunlight Hours (APSH).

- 9.9.5 The submitted report states that it is important to reiterate that alterations in daylight and sunlight to adjoining properties are often inevitable when undertaking any meaningful development, especially in an urban environment. Therefore, the BRE guide is meant to be interpreted flexibly because natural lighting is only one of many factors in site layout design. Indeed, the guidelines suggest that different criteria may be used based upon the requirements for natural lighting in an area viewed against other constraints.
- 9.9.6 The results of these tests have demonstrated that, whilst there will be some deviations from the BRE recommendations, these primarily occur where balconies are creating lower daylight levels. The BRE recognises that balconies limit the daylight potential of the neighbouring properties and will be the driving force of the deviations where these occur. Where deviations do occur in windows and rooms which are not overhung, these are generally minor transgressions from the targets and the windows and rooms retain high levels of daylight for an urban context such as this.
- 9.9.7 In regard to sunlight, the assessment of sunlight to neighbouring rooms has shown high levels of overall compliance, and where there's deviations occur, again they are primarily driven by overhanging balconies which limit the sunlight potential of the rooms below and behind them.

Privacy, Overlooking and Outlook

- 9.9.8 Objections have been received in respect of privacy impacts. These include objections received from neighbouring properties within the Ladderswood development such as Monmorency Park, and Cross Road, Cline Road and Ashridge Gardens.
- 9.9.9 Policy D6 of the London Plan states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing.
- 9.9.10 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.
- 9.9.11 At a local level, Policies DMD6 and DMD8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Additionally, policies DMD6 and DMD8 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. Policy DMD10 of the DMD is silent on distancing standards for this type of relationship but requiring that development would not compromise adjoining sites.
- 9.9.12 The Site is adjacent to the North Circular (A406) and the recently redeveloped Ladderswood site within close proximity to a Local Centre and is considered urban in character. Whilst the development would be somewhat larger and taller

than the existing buildings, it would not be untypical of buildings located in urban locations within adjacent Boroughs.

- 9.9.13 The site is sandwiched by the intervening highways that serve both the North Circular (A406) and Station Road. Ground levels fall as you progress southwards from Station Road towards the North Circular and therefore, the application site is at a lower level than those located to the north. The railway line abuts the site to the west and immediately beyond this are commercial premises. This is also the case, directly south across the North Circular towards Bounds Green, with the Bounds Green Industrial Site immediately opposite the application site. The nearest residential properties are therefore North, North East and North West at Ladderswood (Montmorency Park) and Tewkesbury Terrace and beyond with distances of at least 50 metres separation. The Premier Inn Hotel demarcates the boundary of Ladderswood where Station Road meets the North Circular. This element is 8 storeys and the residential properties are all located beyond with the exception of the adjacent 6 storey flatted development, also fronting Station Road. A minimum distance of approximately 50 metres is maintained from the nearest point of the Tower A. The properties sited at Tewkesbury Terrace are sited approximately 75 metres given the generous frontage of the proposed development, the public highway and generous greensward.
- 9.9.14 Given the set back from the application boundary at this junction, it is considered that the proposed buildings are set away from existing housing so far as possible to minimise any potential for overlooking and/or overshadowing of neighbouring properties. In terms of specific distances, the Proposed buildings are approximately 75m away from Tewkesbury Terrace and 50 metres away from the Ladderswood development along Station Road and the proposed blocks are also located approximately 20 metres away from each other.
- 9.9.15 The proposed distances between existing and proposed homes are thus considered proportionate, within an urban setting. A change in the relationship between the existing homes would take place, which is typical of managed change in an urban location, and not considered significant enough for the development not to be supported particularly as the proposals exceed traditional and past planning guidance 'yardstick' for privacy of 18 – 21m (between habitable room and habitable room).
- 9.9.16 It is therefore concluded that subject to appropriate conditions, requiring full details of the proposed screening and boundary treatment throughout the Site, the Proposed Development is considered acceptable in terms of privacy, overlooking and/or outlook, having regard to policies DMD6, DMD8 and DMD10 of the Development Management Document, Policy D6 of the London Plan and The information contained within the Mayor of London's Housing SPG.

Noise and Disturbance

- 9.9.17 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'.
- 9.9.18 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.

- 9.9.19 The proposed residential development is consistent with the existing prevailing mix of uses in the area and it is therefore unlikely that any unacceptable levels of noise would be generated as result of the residential element of the development. The proposal also includes two commercial units at ground floor at 280 sq.m and 91 sq.m, which would be used either in a retail, restaurant, café, drinking establishment capacity, or office capacity. Both units would be located at ground floor level. In order to protect the amenity of existing nearby occupiers and future occupiers of the Development, a condition is recommended restricting opening and operational hours of the commercial unit. Subject to this condition the commercial unit would not be considered likely to give rise to any unacceptable adverse amenity impact in terms of noise and disturbance. In addition, the managed nature of the development would also provide extra measures to deal with any unexpected noise disturbance should they arise.
- 9.9.20 Moreover, a larger concern is regarding the siting adjacent to the busy North Circular Road (A406) and the overground line serving New Southgate. An Acoustic Report was submitted as part of the application package and the Environmental Health officer has assessed the submitted details and concluded that appropriate conditions could be attached to improve the residential environment and protect residential amenities from noise and disturbance.
- 9.9.21 Additionally, with regard to occupier amenity, it is recognised that most developments in urban areas will be subject to noise levels above the BS8233 recommended levels for balconies. However, it is reasonable to assume that future occupiers would prefer the option to have a noisier balcony as opposed to having no balcony at all. Furthermore, it is acknowledged that there are no other noise mitigation measures available for balconies other than fully enclosing them (i.e. 'winter gardens') which has been possible within some of the shared amenity space provision on site, and thus this would provide alternatives, where required.
- 9.9.22 It is therefore concluded that the proposed development is considered acceptable in relation to noise levels both internally, and externally in private amenity areas, having regard to policies DMD68 of the Development Management Document, CP32 of the Core Strategy and D14 of the London Plan as well as the guidance contained within the NPPF.

Light Pollution

- 9.9.23 It is recognised that that there is the potential for some level of light pollution arising from the development. Whilst it is acknowledged that a large development would likely generate significantly more light than the existing vacant site, or previous use, a planning condition could be attached requiring details of external light spill and light spill to internal communal areas to safeguard against adverse impact. In relation to individual residential units and glare to car users, having regard to policy CP32 of the Core Strategy.

9.10 Transport

- 9.10.1 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) Policy 6.13 does not resist the loss of park and ride. 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.

- 9.10.2 London Plan Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. LPItP Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. LPItP 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.
- 9.10.3 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 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.
- 9.10.4 The application site is located at the junction of the A406 North Circular, which forms part of the TLRN, and the A109 Station Road. It lies adjacent and immediately to the west of the former Homebase site, and to the north of the site, on the opposite side of Station Road, is the redeveloped Ladderswood Estate. The site forms part of the New Southgate Masterplan, which proposes the redevelopment of both sides of Station Road, however the former Homebase site immediately adjacent to the subject site is not included in this proposal and has recently been subject to an application for a "meanwhile use" as an Aldi store and B&M store.
- 9.10.5 The site has a PTAL of 4 which is good, being approximately 600m away from New Southgate rail station to the north west, and 650m from Arnos Grove underground station to the north east. The site is also well served by local bus routes on both the A406 and Station Road. Additionally, the proposals include new public routes through the site, and a new public square accessed off Station Road which aligns with the pedestrian route down Palmers Road from Arnos Grove, linking with the Ladderswood Estate site.
- 9.10.6 Vehicle access to the site will be via Station Road, at the existing access shared between the former Homebase site and the application site.

- 9.10.7 A Transport Statement (December 2020), prepared by TPP was submitted as part of the application package.

Car Parking

- 9.10.8 In accordance with London Plan policy T6, six blue badge car parking spaces would be provided within the basement of the proposed building from the outset, which would allow for 3% of the 182 residential units to have access to a disabled parking space, and it was noted that the development also makes provision for a scenario where this can be increased to 18 spaces if required, to allow for up to 10% of the residents to have access to DPBs, which is considered acceptable. However, as outlined within pre-application discussions, the Council are comfortable with the development being car-free if the site is included in a CPZ – the site is currently just outside the Arnos Grove CPZ. It was noted that section 4.3.7 of the Transport Assessment states, “it is proposed to fund the extension of the Arnos Grove CPZ” and confirms that the development would be permit-free. On that basis, this would need to be secured via a Unilateral Undertaking within the Section 106 agreement. Additionally, following further discussions with the applicant it was confirmed that electric vehicle charging points would be provided with 20% of the spaces having active facilities and the rest being subject to passive provision. This would be secured by an appropriate condition, alongside appropriate management.

Pedestrian Links

- 9.10.9 It is also noted that the site would be expected to link with the former Ladderswood Estate, now known as Montmorency Park, as well as other sites within the wider New Southgate Masterplan. Therefore, it is very important that good, safe links are established with these. It should be noted that the nearest primary school, Garfield Primary School, is accessible via the Montmorency Park development, and Broomfield Secondary School is also to the north east of the site, so a safe crossing facility on Station Road is a clear priority, as also identified in the Masterplan.
- 9.10.10 The submitted Transport Statement states that there are Zipcar car renting services on Warwick Road, within a 750m walk to the east of the site, as well as 3 car club bays being provided within the Montmorency Park development (this is further evidence of the need for a safe link between the two sites across Station Road). It is also noted that the site is located immediately north of the Zipcar flex zone, which allows for one-way trips to be made with Zipcar. This reiterates that coupled with a good Sustainable Transport Measures package which includes car club credits, this is a good location for car-free development, discouraging the need for private car ownership.
- 9.10.11 The site would create new pedestrian links from Station Road and the North Circular, and that on the Station Road frontage the building line is set back to increase footway width. As previously mentioned, a new public square is proposed at street level, accessed from Station Road, and this will align with the pedestrian route down Palmers Road from Arnos Grove Station, running through the redeveloped Ladderswood Estate/Montmorency Park development.
- 9.10.12 The documents state that in the proposed development, Tower A would have 103 units and Tower B would have 78 units. A total of 371m² GEA of flexible commercial space would be provided across 2 units on the ground / first floor levels.

Vehicular Access

- 9.10.13 As mentioned above, the vehicle access from the public highway would remain in the existing location on Station Road, which currently provides access to the entire site and is shared between the existing Homebase site and the subject site. The submitted Transport Statement states that the exact alignment of the internal access road is yet to be agreed with the adjacent owners. Further details would therefore be required to show the route and tracking of vehicles from the public highway to the basement, including the internal access road. This would be verbally reported to Planning Committee.
- 9.10.14 The ramp has headroom of 4m, and the submitted Transport Statement states and the tracking shows that it is sufficiently wide for two cars, or even a car and an LGV to pass on the ramp. The width of the ramp is 6m, which increases to 7m around the bend and where it meets the lower ground. Additionally, the gradient of the ramp is 1:10 with a shallower gradient of 1:20 for 5m at the top and bottom of the ramp. The Transport Statement claims that it is proposed for HGVs to have access via the ramp, but as the ramp could not accommodate any passing vehicles when the HGV is using it, the TA refers to using “traffic lights or sensor detectors” to control access and ensure no conflict occurs on the ramp. Please clarify which of these methods is proposed – again, this is something that we would need to establish the working of before the proposal could be recommended to Committee for approval.
- 9.10.15 It was noted that the Transport Statement confirms there are no plans for cyclists or pedestrians to use the vehicle access ramp, as there would be separate dedicated entrances, which are considered acceptable.

Delivery and Servicing Plan

- 9.10.16 Within the boundary of the development, vehicle access is in the form of a ramp leading to the lower ground floor; this is proposed to accommodate all delivery and servicing movements to the site, as set out within the Delivery and Servicing Plan. These details for a Delivery and Servicing Plan would therefore be secured within the s106 agreement.

Delivery and Servicing

- 9.10.17 It was noted that the Transport Statement specifies that the commercial units would have it written into their leases that there is a requirement to direct all their regular suppliers to the lower ground floor servicing area. However, following further discussions with the applicant and the Councils highway officer, it has been agreed that the best solution would be to accommodate a loading bay on Station Road to service the commercial units and residential cores on the east of the site with links to the public highway. The bay would be at least 12m long to allow for a 10m rigid vehicle to be accommodated or two vans simultaneously. A small dropped kerb would also be required to assist with movement of goods across the footway between the vehicles and the development. It is envisaged that loading within the loading bay would be limited to a period of time; this typically ranges from 20 – 30 minutes to discourage vehicles from staying longer than needed. Additionally, yellow line restrictions would be required on Station Road to remove the current ad-hoc parking and/or loading especially on the stretch of the road near the junction with the A406. The costs of this to include including lines, signs and any traffic orders and permits would thus be met by the applicant and secured by the S106.

Refuse

- 9.10.18 Refuse collection is also from the lower ground floor servicing area, and the submitted tracking provided complies with the size of refuse vehicles used by LBE. Although the proposed head height of 4m meets Council standards, there was some concern given that the ramp angle and sharp turn could cause an issue. However, further cross sections of the proposed ramp with clearance heights were provided, which were considered acceptable.

Cycle Parking

- 9.10.19 With regards to cycle parking, the TA states that this has been provided in accordance with London Plan standards, namely 1.5 long stay spaces per 1-bed unit, and 2 long stay spaces per 2-bed + unit. As there are 51 x 1-bed units and 59 x 2-bed + units in Tower A, and 20 x 1-bed units and 52 x 2-bed + units in Tower B, the minimum requirement is 195 long stay spaces to serve Tower A, and 134 spaces to serve Tower B, a total of 329 long stay cycle parking spaces.
- 9.10.20 Short stay cycle parking is also proposed for the residential units at the agreed rate of 1 space per 40 units; if there are 182 units then this makes a requirement for 5 short stay spaces.
- 9.10.21 Commercial cycle parking is also being provided, with one long stay space within the demise of each of the commercial units, and 9 further short stay spaces within the public realm.
- 9.10.22 However, the submitted plans are not clear given the various locations for cycle parking on site, therefore further discussions were undertaken with the applicant to confirm the allocation of the cycle parking for both residential and commercial units. The applicant confirmed that there would be flexibility by the site management and the exact arrangement thus depended on site ownership and demand across the development. On that basis, for example, the basement provision would therefore not be automatically allocated to the lower floors as the site management would take into account residents' preferences.

Trip Generation

- 9.10.23 In terms of Trip Generation, TRICS figures are supplied that show it is expected that the site would generate 108 total person trips in the AM and PM peak hours of 8am-9am, and 5pm-6pm. As the scheme is car-free, this would not have a significant impact on the local highway. In terms of servicing, TRICS estimates are that there would be 11 LGV or car arrivals, and 2 HGV arrivals per day (13 in total) for the residential element, which again, would not be significant, and would be accommodated within the lower ground servicing area.
- 9.10.24 With regards to commercial trip generation, it was noted that the TA states that as the commercial units are flexible, in order to make the most robust assessment they have assessed these as having B1 office use with a ratio of 1 employee per 11m²; this would generate 17 trips in the AM peak, and 25 trips in the PM peak, which again, due to the car free nature of the site would not put a lot of pressure on the highway network (assuming that the businesses are also exempt from business parking permits for the CPZ, which we would seek to secure via the UU in the S106).
- 9.10.25 It was noted that the Active Travel Zone assessment included with the TA supports the improvements as set out in the Southgate Masterplan, which are welcomed. The main identified areas of improvement are in improving the tunnel section of the North Circular; additional pedestrian routes away from high

traffic (these are being brought forward as part of Montmorency Park development and the wider Masterplan); the wide crossover with no pedestrian refuge on Station Road by the shared access with Homebase

S106 Highway Contributions

- 9.10.26 In terms of contributions that we would expect to see from this development, the funding of the pedestrian crossing across Station Road is absolutely key, as is the pedestrian refuge island at the intensified site access further along Station Road. As identified in our pre-app discussions, we would also need £35k towards reviewing the Arnos Grove CPZ so that it can include this site, and based on our standard contributions, we would expect the development to also provide £58,930 in Healthy Streets contributions and £107,158 towards a Sustainable Transport Package for each unit (to include car club membership for two years with £50 driving credit, an Oyster card per bedroom and two years of London Cycling Campaign membership per bedroom. Additionally, costs of securing the loading bay, including lines, signs and any traffic orders and permits, would be met by the applicant.
- 9.10.27 It is therefore considered that the proposed development is acceptable in terms of its impact on the local transport network, having regard to policies DMD45 and DMD47 of the DMD, CP24, CP25 and CP26 of the Core Strategy and policies T2, T6 & T9 of the London Plan.

9.11 Trees and Landscaping

- 9.11.1 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.
- 9.11.2 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.
- 9.11.3 The submitted Landscaping Plan has a proposed Masterplan which outlines various urban greening factors such as the introduction of 1052 sq.m of semi natural vegetation, tree planting of 76 trees, 166 sq.m of rain gardens and sustainable drainage elements, 446 sq.m of perennial planting, 82 l/m of hedges, 299 sq.m of amenity grassland and 2758 sq.m of permeable paving. However, following discussions with the applicant and the Councils tree officer, the proposed replanting of 76 semi mature species was reduced to around 50. This was to enable adequate space to achieve a successful landscaping scheme, having regard to policies DMD80 and DMD81 of the DMD.
- 9.11.4 A Tree Report and Arboricultural Impact Assessment (AIA), prepared by RPS, was submitted, which referred to the removal of a number of Category C and U trees on site. The Councils Tree Officer assessed the submitted details and confirmed that there are no objections to the removal of the Category C and U trees, however, a Preservation Order was recently placed on the Category B Lime trees and thus their removal was deemed unacceptable, and have now been retained and incorporated as part of the redevelopment of the site.

- 9.11.5 The Council's Tree Officer has requested that a further condition is attached to secure the submission of a detailed Arboricultural Method Statement (AMS) with Tree Protection Plan to demonstrate that trees would be successfully protected during the site's redevelopment. This would include arboricultural supervision of all sensitive works within the Root Protection Area of retained trees, including the installation of no-dig paths and changes to boundary treatments, and monitoring of the respective phases of the tree protection measures, as has been identified within the submitted AIA.
- 9.11.6 It is therefore 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. It is also noted that substantial amounts of landscaping are proposed as part of the development. As such there would be an improvement resulting from this and from the gain in trees in terms of visual amenity and biodiversity benefits.

9.12 Water Resources, Flood Risk and Drainage

- 9.12.1 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal erosion. Whilst the Environment Agency is responsible for developing a new national flood and coastal risk management strategy Lead Local Flood Authorities (LLFA), such as the London Borough of Enfield will have overall responsibility for development of a Local Flood Risk Management Strategy for their area and for co-ordinating relevant bodies to manage local flood risks.
- 9.12.2 Policy SI12 of the London Plan requires developments to ensure flood risk is minimised and mitigated and that residual risk is addressed. The site is partly located within Flood Zones 2 and 3.
- 9.12.3 Additionally, London Plan Policy SI13 relate to sustainable drainage whereby the preference is to reduce surface water discharge from the site to greenfield run off rates.
- 9.12.4 The Council's draft Local Plan sets out the Borough's ambitions in relation to growth until 2036. Policy SUS5: Surface Water Management notes the following overarching aims in relation to drainage and flood risk: All major developments to implement Sustainable Drainage Systems (SuDS) to enable a reduction in peak run-off to greenfield run-off rates for the 1 in 1 year and the 1 in 100-year event (plus climate change allowance); All major developments to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated to reduce peak flow volumes and rates in line with the requirements of this draft policy approach; All other developments to maximize attenuation levels and achieve greenfield runoff rates where possible or increase the site's impermeable area; Development to be designed to minimise flood risk and include surface water drainage measures to be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality, and safe environments for pedestrian and cyclists; All new outdoor car parking areas and other hard standing surfaces be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so; Living roofs to be incorporated into new development, to help contribute to reducing surface water run-off; and Where installed, SuDS

measures be retained and maintained for the lifetime of the development and details of their planned maintenance provided to the Council.

- 9.12.5 Supporting these principles is Development Management Document Policy DMD 61 which requires a drainage strategy to be produced that demonstrates the use of SuDS in line with the London Plan discharge hierarchy. The policy requires the use of SuDS to be maximised with consideration given to their suitability, achieving greenfield run off rates, the SuDS management train and to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value.
- 9.12.6 Alongside the above policy, the Council sets out further advice in its Flood Risk guidance which outline strategies for the mitigation of flood risk, management of surface water including the implementation of Sustainable Urban Drainage Systems (SuDS) on new developments, with allowances for the impact of climate change. The guidance recommends that the relevant documents are i) Preliminary Flood Risk Assessment, ii) Surface Water Management Plan, iii) Strategic Flood Risk Assessment (Levels 1 & 2), iv) Local Flood Risk Management Strategy, and v) Sustainable Drainage Design and Evaluation Guide.
- 9.12.7 Finally, the CIRIA C753 'The SuDS Manual' 2015 includes up-to-date research, industry practice and guidance in relation to delivering appropriate SuDS interventions including information on measures to deliver cost-effective multiple benefits relating to technical design, construction and maintenance of SuDS systems.
- 9.12.8 The proposed development would remove existing landscaping and urbanise a currently vacant site, however Sustainable Drainage measures (SuDS) including green roofs, rain gardens and permeable paving would be incorporated within the design. This is strongly supported by Officers and is considered to be a scheme benefit alongside the urban greening measures proposed at ground floor level including appropriate planting, rain gardens and permeable paving. On that basis, an appropriate condition could be attached to secure a detailed SuDs Strategy in accordance with the measures outlined above, having regard to policies DMd61 of the DMD. Additionally, a further condition could be attached to secure details of a green roof. The SuDs officer has no objections to this element of the proposal.
- 9.12.9 However, in regard to flood risk, the applicant has submitted a Flood Risk Assessment which assessed possible sources of flood risk in respect of London Plan Policy SI12 and SI13. The site is located within flood zones 2 and 3 and both the Environment Agency and the Councils SuDS officer has objected due to insufficient information. In particular, further information was required regarding climate change in regard to fluvial and ground water flood risk. Additionally, the Environment Agency also raised the possibility of naturalising Bounds Green Brook in this location, which required further consideration.
- 9.12.10 In addition to the above, further information was also required in regard to the following:
 - A 1 in 100 year +35%CC flood map of the existing and proposed site with spot levels would be helpful in determining the flood compensation required for the site
 - Level for level flood compensation must be provided for the site for this event i.e. this will need to be provided in an above ground feature
 - The FFLs must be at least 300mm above the 1 in 100 year +35%CC flood level. If the FFLs are proposed to be lower than this, we must understand
 - a) The difference in the flood level for the 1 in 100 year +35%CC and 70%CC

- b) The reasoning why the FFLs cannot be 300mm above the 1 in 100 year +35%CC flood level
- Further information must be provided on how the fluvial flood waters will not enter the basement. This may include the entrances and exits of the basement will be set higher than the flood level
- Further information must be provided regarding the Flood Management Plan, such as emergency evacuation routes.

9.12.11 However, an updated Flood Risk Assessment and further information were submitted to the Council and the Environment Agency has now removed their original objection. Additionally, 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.

9.13 Environmental Considerations / Climate Change

9.13.1 The NPPF maintains the presumption in favour of sustainable development, including environmental sustainability, and requires planning to support the transition to a low carbon future in a changing climate (Para.152). This entails assisting in reducing greenhouse gas emissions, minimising vulnerability, encouraging the reuse of existing resources and supporting renewable and low carbon energy infrastructure.

9.13.2 At a Regional level, Policy G1 of the London Plan acknowledges the importance of London's network of green features in the built environment and advocates for them to be protected and enhanced. The Policy notes that green infrastructure 'should be planned, designed and managed in an integrated way to achieve multiple benefits'. Also of relevance is Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.

9.13.3 Paragraph 154 of the NPPF requires new developments to be planned for in ways that 'avoid increased vulnerability to the range of impacts arising from climate change...' and 'can help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. Meanwhile the London Plan and Enfield Issues and Options Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

Energy and Sustainability

9.13.4 Currently, all residential schemes are required to achieve net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The same target will be applied to nondomestic developments when the new London Plan is adopted.

9.13.5 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.

9.13.6 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.

9.13.7 A Sustainability Statement, (dated December 2020), prepared by XC02 was submitted as part of the application package. This provides an overview of the sustainability strategies for the proposed development. The documents demonstrate how the proposal has sought to meet London Plan requirements and relevant Council policies.

9.13.8 The document concludes that the proposed development is targeting the achievement of BREEAM 'Excellent' and is expected to reduce on-site regulated carbon emissions by 37.8% against a Part L 2013 compliance scheme with SAP2012 emissions factors. This could be secured by an appropriate condition and is thus deemed acceptable.

9.13.9 The document also identifies a number of key sustainability measures as follows:

- The re-use of previously developed land with an effective layout and scale;
- A fabric first approach through the specification of high-performance fabric and glazing to minimise heat losses;
- Efficient design of the proposed massing openings and internal layouts so that habitable and commercial spaces across the site benefit from adequate daylight and sunlight levels;
- Connecting to the local district heating network for efficient supply of energy to the development, having regard to policy DMD52 of the DMD;
- Incorporating of renewable technologies for further CO₂ savings, having regard to policy DMD53 of the DMD;
- Specification of water saving fixtures and fittings to improve water efficiency, having regard to policy DMD58 of the DMD;
- Mitigation of overheating risks through adequate glazing and ventilation strategy, insulation of heat sources and pipe work and the specification of efficient lighting to reduce heat gains internally;
- Provision of landscaped areas, planted balconies and green roof terraces to enhance the biodiversity at the site, having regard to policies DMD81 of the DMD and CP36 of the Core Strategy
- Site-specific SuDS including green roofs, permeable paving system and below ground geocellular attenuation storage volume will be incorporated to reduce surface water run-off and mitigate flood risk, in line with Core Policy 28;
- To minimise the environmental impact of the procurement process for the scheme, a Green Procurement and Construction Plan, having regard to policy DMD57 of the DMD;
- A site waste management plan would be in place to effectively handle the demolition, excavation and construction waste, having regard to policy DMD57 of the DMD;
- Re use and recycling of demolition, excavation and construction waste will be carried out where possible;
- Operational waste will be managed through provision of waste storage, separation of recyclable, general and organic waste;
- Air pollution risks from construction and demolition on site will be minimised, having regard to policies CP32 of the Core Strategy and DMD64 and DMD65 of the DMD;
- Adequate noise attenuation measures will be incorporated to ensure noise levels are within acceptable limits, having regard to policies CP32 of the Core Strategy and DMD68 of the DMD; and

- The external lighting strategy shall ensure minimal disturbance to wildlife, having regard to policies CP32 of the Core Strategy and DMD68 of the DMD.
- 9.13.10 In regard to sustainability, it is considered that appropriate conditions could be attached to secure matters raised within the submitted report such as BREAAAM, water consumption and site waste management plan.
- 9.13.11 The submitted Energy Statement (dated December 2020), prepared by XC02 concludes that the estimated regulated C02 Savings on site are 37.7% for the domestic element and 40.4% for the non-domestic part of the development against a Part L 2013 compliant scheme with SAP 2012 carbon facts and thus seeks to comply with the 35% reduction stipulated in the London Plan.
- 9.13.12 The document outlines that the C02 emission reduction would be achieved by implementing a three step Energy Hierarchy with savings from heat network/CHP, renewable energy, cumulative on-site savings, energy demand reduction and cumulative for offset payments. With the Sap 2012 carbon factors, to achieve 'zero carbon' for the residential portion of the scheme, 127.3 tonnes per annum of regulated CO₂, equivalent to 3,820 tonnes over 30 years, from the new-build domestic portion should be offset offsite. To achieve 'zero carbon' for the non-residential portion of the scheme, 6.4 tonnes per annum of regulated CO₂, equivalent to 191 tonnes over 30 years, should be offset offsite. Any carbon offset contributions would be subject to viability discussions and detailed design stage calculations.
- 9.13.13 The energy technologies to be implemented within the development include photovoltaic panels and air source heat pumps, which would reduce CO₂ emissions. Other technologies, such as wind turbines, ground source heat pumps, solar thermal and biomass heating were discounted, as outlined within the submitted Energy Statement.
- 9.13.14 The submitted Energy Statement also outlines that the application site is located within an area with district heating, managed by the council-owned company Energetik, with the development expected to connect to the District Energy Network (DEN). This has been encouraged and strongly supported by officers and Energetik. The district heating network is expected to provide heating and hot water to all uses on site. The network connection is proposed in accordance with the requirements of Policy SI3 of the London Plan and policy DMD52 of the Development Management Document alongside Enfield's adopted Decentralised Energy Network Technical Specification SPD, which require major development to connect to existing heat networks unless there are feasibility or viability reasons not to. Further S106 planning obligations could be secured in line with the Council's adopted policies and by appropriate conditions.

Ecology and Biodiversity

- 9.14.1 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.

- 9.14.2 Within a more strategic context the Environment Bill, published by the UK Government in October 2019 includes proposals to make biodiversity net gain (BNG) a mandatory requirement within the planning system in England. Should the Environment Bill be passed in a form similar to that introduced in October 2019, developments such as this will be required to achieve a 10% gain in biodiversity units relative to the development site's baseline biodiversity.
- 9.14.3 The site is adjacent to the North Circular (A406) and currently considered of low biodiversity and ecological value, with the exception of vegetation to the periphery of the site, and the trees protected by a Preservation Order.
- 9.14.4 The submitted Preliminary Ecological Appraisal (dated December 2020), prepared by XC02 concludes that wildlife planting, a green roof, protection to retained trees and provision of bird and bat boxes would contribute to improved biodiversity at the site. Additionally, it refers to various mitigation measures to protect existing habitats, birds and bats and concludes that the existing trees and buildings on site were deemed to provide low potential to support roosting bats. The proposed development would not result in the disturbance of any existing habitats. In addition, the scheme has been designed with the protection and enhancement of the habitat and biodiversity within and adjacent to the site, in mind. To that end planting has been selected to maximise biodiversity value and features native or near native species which will help to reinforce the established nature of the adjoining Sites of Importance for Nature Conservation (SINC).
- 9.14.5 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.

9.15 Site Waste Management

- 9.15.1 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.
- 9.15.2 A Site Waste Management Plan (dated, December 2020), prepared by XC02 was submitted as part of the application. It refers to Demolition Waste, Excavation Waste and Construction Waste.

Demolition Waste

- 9.15.3 The main structures that were present at the site, including the gasholder and ancillary structures, have been demolished, with their demolition having been subjected to a Prior Notification of Proposed Demolition Ref 19/00547/PAMEDE in April 2019. The demolition waste associated with this element of the works is not accounted for within this Site Waste Management Plan. It is estimated that approximately 337 tonnes of waste will be generated as a result of the demolition of the existing substation building on site

Excavation Waste

- 9.15.4 The calculation of the quantity of excavation waste was based on approximate estimates of the foundation and subsurface elements provided by pH+ Architects. Based on the site geology and the estimates of the excavation depth provided by pH+ Architects, approximately 16,960 tonnes of waste are estimated to be generated from the excavation works

Construction Waste

- 9.15.5 The quantities of construction waste estimated for the proposed development were based upon benchmark waste quantities per unit of the Gross External Area by land use type (BRE's Reduction, Re-Use and Recycling of Construction Waste), or project specific targeted waste quantities per unit of Gross Internal Floor Area based on BREEAM requirements. The quantities of construction waste for the development was estimated from the targeted BREEAM benchmark of 6.5 tonnes per 100m² of Gross Internal Floor area. It is anticipated that approximately 1,099 tonnes of waste will be generated during the construction process of the scheme
- 9.15.6 The document also outlines General Site Waste Management Measures, Hazardous Waste Management Plan and Waste Prevention Actions.
- 9.15.7 Given that the proposed development seeks to minimise waste generation as much as is feasible during the demolition, excavation and construction phases, it is considered that no significant adverse effects in respect to waste management would arise as a result of the development, having regard to Policies DMD49 and DMD57 of the Development Management Document, CP22 of the Core Strategy, and S17 of the London Plan. This could be secured by an appropriate condition to ensure appropriate implementation.

9.16 Contaminated Land

- 9.16.1 The site is currently vacant, however having previously served a gas holder there are matters regarding the potential pollution of the site, which is a site constraint.
- 9.16.2 The Councils Environmental Officer has considered the submitted Contamination Report (December 2020) and states that further investigative work is required at the site in regard to vapours and ground water. It is therefore considered necessary to attach further conditions in regard to Remediations Strategy and a Verification Report, having regard to relevant guidance in the NPPF.

9.17 Air Quality / Pollution

- 9.17.1 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.
- 9.17.2 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.
- 9.17.3 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.

- 9.17.4 Given the proposed Energy Strategy and inclusion of electric car charging points the proposed development is considered unlikely to result in a negative environmental impact, including in terms of air quality/pollution and/or noise.
- 9.17.5 Additionally, the Councils Environmental Health Officer has considered the submitted Air Quality Assessment (December 2020) and requested appropriate conditions pertaining to non-road mobile machinery, acoustic report and construction management plan in the interests of good air quality and noise and disturbance to neighbouring occupiers, having regard to policies DMD65 and DMD68 of the DMD, CP32 of the Core Strategy and SI1 of the London Plan.

9.18 Health

- 9.18.1 The NCAAP (2014) states that NC Policy 5 'Provision of Modern Healthcare Facilities' states that development of 10 residential units or more will be expected to contribute towards the provision of health facilities within the NCAAP area, and financial contributions will be calculated using the NHS Healthy Urban Development Unit Model.
- 9.18.2 Having regard to the 2011 Census, the ward population for Southgate Green within the London Borough of Enfield Authority, was recorded as 13,787 with the number of households 5,154. Within that ward population the economically active (age 16-64 in full time work, part time work, self-employed, full time students or unemployed) is 73.4%, which is slightly lower than the England and Wales average of 76.8%.
- 9.18.3 The applicant has submitted a Health Impact Assessment, dated December 2020, which includes a desktop survey. This assesses the extent to which the proposals address four health related themes of healthy housing, active travel, healthy environment, and vibrant neighbourhoods. This assessment concludes that the proposed development achieves key policy requirements and standards, delivering a scheme which is considered a 'healthy' development that can positively influence health and wellbeing
- 9.18.4 Officers consider that the proposed development would result in the provision of good quality housing, commercial space, additional local spending by residents of the new development, and the provision of public and private amenity space and open space. As the proposals would provide good quality housing, a small level of employment opportunities by way of the ground floor commercial units and access to amenity areas, potential positive effects on health are anticipated in regard to access to open space, crime reduction and community safety. Taking the above into consideration, overall, it is considered that some positive environmental effects on socio-economics would arise as a result of the development. Furthermore, it is not considered there would be any significant effects on health occurring as a result of the development.

9.19 Fire Strategy

- 9.19.1 Policy D12 of the requires developments to be designed to incorporate appropriate features to reduce the risk to life and Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users. A fire statement produced by a third party suitably qualified assessor, has been submitted as part of the application which satisfies London Plan Policy D12. London Fire Service have confirmed that details provided in relation to Fire Brigade Access are satisfied with the proposals. In particular, the submitted document confirms that the proposed floors for commercial areas, as well as residential amenity and ancillary areas, which do not include level access to the outside would be provided with a disabled refuge area within the protected lobby to the stairs, achieving 1,400mm x 900mm and provided with an emergency

voice communication system in accordance with BS 5839-9. A condition would therefore be required to secure a management strategy to include information on staff training and details of how occupants with a disability would be evacuated in the event of a fire and identify key roles in ensuring that they are assisted in a fire situation.

10.0 Section 106 and Community Infrastructure Levy

- 10.1 Both Enfield CIL and the Mayor of London CIL² would be payable on this scheme to support the development of appropriate infrastructure. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved. Based on the Mayor and Council's Charging Schedules, the total level of CIL is expected to be in the order of £1,765,181 (based on current details of 17,275 sq.m floorspace, certain scheme assumptions, indexation assumptions and inclusion of relief).

Section 106 Heads of Terms

- 10.2 The NPPF requires that planning obligations must be:
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and,
 - (c) Fairly and reasonably related in scale and kind to the development.
- 10.3 Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.
- 10.4 Core Policy 46 seeks to ensure that development proposals make adequate provision for both infrastructure and community facilities that directly relate to the development. Developers will be expected to meet the full costs of facilities required as a consequence of development and to contribute to resolving deficiencies where there would be made worse by the development. The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. Additionally, Policy S1 of the London Plan refers to social infrastructure and seeks to ensure that the diverse needs of London's communities are met, including health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities.
- 10.5 A Section 106 would be required for the scheme and will comprise the following Heads of Terms:
- Affordable Housing
Provision of no less than 30% affordable housing. Tenure mix secured.
A means to control and monitor the delivery and management of affordable housing
Viability review – future review of scheme viability to assess potential for uplift in affordable housing provision
 - Education
Contribution of £2,535 per dwelling regardless of unit size
 - Highways
Contribution towards sustainable transport measures
Implementation of loading bay
Travel Plan

Exempt future resident's eligibility for local parking permits, and expand CPZ if needed

Loading bay-costs for any works such as lines, signs and any traffic orders and permits

- Employment and Skills Strategy
- DEN connection
- Carbon Neutral Offset
- Heritage-Friends of Millennial Green - refer to the Gas Holder site history
- Management Fees

11. Conclusion

11.1 The proposed site is a brownfield site in a sustainable location within the Western Gateway, as outlined within the adopted North Circular Area Action Plan New Southgate Masterplan. As a previously developed site which is currently underutilised, the proposed development for housing is fully supported by policies for boosting the supply of homes (NPPF, London Plan GG2 and H1 as well as the aims and intentions outlined with the New Southgate Masterplan).

11.2 The Site has a PTAL rating of 4 (good) given its siting within close proximity to underground and overground links, and with a bus stop to the front of the site. The well-connected site aligns with Mayoral and emerging local ambitions of moving towards providing exemplary designed high density residential led developments in sustainable locations.

11.3 The delivery of 182 new homes will optimise the use of a sustainably located brownfield site and make an important contribution towards meeting both the Council's and the Mayor's annualised housing targets. The provision of 30% affordable housing would meaningfully contribute towards local and strategic housing need and targets. Additionally, the site would provide new commercial opportunities to support the residential land use and immediate surrounding area.

11.4 Optimisation of development on the site has also considered the requirements for residential space standards, private external amenity, play space and creating mixed and inclusive communities through the provision of wheelchair accessible and adaptable units, public transport accessibility and movement, impact on residential amenity, townscape and character and the adequacy of existing social infrastructure.

11.5 As a result of the above characteristics the proposal is considered to accord with the development plan, as a whole, and as such it benefits from the statutory presumption in favour of the development plan as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004. This policy support for the proposal is further reinforced by its compliance with important other material planning considerations, such as the NPPF and the London Plan 2021 to which, for reasons explained elsewhere in this report, significant weight has been attached. On the basis of the above, it is considered that, on balance, the proposed development would align with relevant local, regional and national policy and as such is recommended for approval.



Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions			
P1	20.12.18	Issued for Planning	



Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Site Plan

Status	Scale
PLANNING	A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0101	- GA -	P1



Note: Indicative Masterplan to wider site shown for context

Copyright pH+.

No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions

P1	20.12.18	Issued for Planning
P2	20.12.21	Re-issued for Planning



Page 66

pH+

Puncher Hamilton Plus Ltd

Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title

Gas Holder Site

Project Address

Station Road, N11

Drawing Name

Proposed Elevation B-B

Status

PLANNING

Scale

A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0401	- GA -	P2



Note: Indicative Masterplan to wider site shown for context

15m 5m 0m

Copyright pH+.

No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions

P1	20.12.18	Issued for Planning
P2	20.12.21	Re-issued for Planning



Page 67

pH+

Puncher Hamilton Plus Ltd

Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title

Gas Holder Site

Project Address

Station Road, N11

Drawing Name

Proposed Elevation A-A

Status

PLANNING

Scale

A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0400	- GA -	P2



Note: Indicative Masterplan to wider site shown for context

Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions		
P1	20.12.21	Issued for Planning



pH+

Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Elevation C-C

Status	Scale
PLANNING	A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0402	- GA -	P1



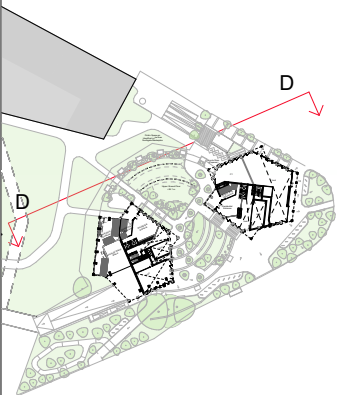
Note: Indicative Masterplan to wider site shown for context

Copyright pH+.

No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions

P1	20.12.21	Issued for Planning
----	----------	---------------------



pH+

Puncher Hamilton Plus Ltd

Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title

Gas Holder Site

Project Address

Station Road, N11

Drawing Name

Proposed Elevation D-D

Status

PLANNING

Scale

A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0403	- GA -	P1



Note: Indicative Masterplan to wider site shown for context

Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions		
P1	20.12.21	Issued for Planning



Page 70

pH+

Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Elevation E-E

Status	Scale
PLANNING	A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0404	- GA -	P1



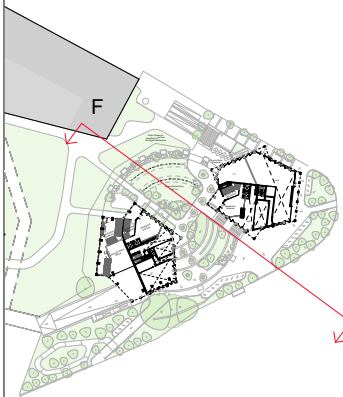
Note: Indicative Masterplan to wider site shown for context

Copyright pH+.

No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions

P1	20.12.21	Issued for Planning
----	----------	---------------------



pH+

Puncher Hamilton Plus Ltd

Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title

Gas Holder Site

Project Address

Station Road, N11

Drawing Name

Proposed Elevation F-F

Status

PLANNING

Scale

A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0405	- GA -	P1



Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions			
P1	20.12.18	Issued for Planning	



Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed First Floor

Status	Scale
PLANNING	A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X	- 0201	- GA	- P1



Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions		
P1	20.12.18	Issued for Planning



Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Fourteenth Floor

Status	Scale
PLANNING	A3 1:500
Proj. No.	Area
0877 - X - 0214 - GA - P1	



NOTE: Builder's Depot Building on old railway viaduct on higher level above Gateway site

Copyright pH+.

No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions

P1 20.12.18 Issued for Planning

pH+

Puncher Hamilton Plus Ltd

Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title

Gas Holder Site

Project Address

Station Road, N11

Drawing Name

Proposed Ground Floor

Status

PLANNING

Scale

A3 1:500

Proj. No. Area Dwg. No. Type Rev

0877 - X - 0200 - GA - P1



Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions		
P1	20.12.18	Issued for Planning



Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Nineteenth Floor

Status	Scale
PLANNING	A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0219	- GA -	P1



Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions			
P1	20.12.18	Issued for Planning	

pH+

Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Roof Plan

Status	Scale
PLANNING	A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X -	0220	- GA -	P1



Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

P1	Issued for Planning	20.12.18
----	---------------------	----------

Page 77

pH+

Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Second Floor

Status PLANNING	Scale A3 1:500
----------------------------------	--------------------------

Proj. No. 0877	Area - X -	Dwg. No. 0202	Type - GA -	Rev P1
---------------------------------	-----------------------------	--------------------------------	------------------------------	-------------------------



Copyright pH+.
No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions			
P1	20.12.18	Issued for Planning	

pH+

Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

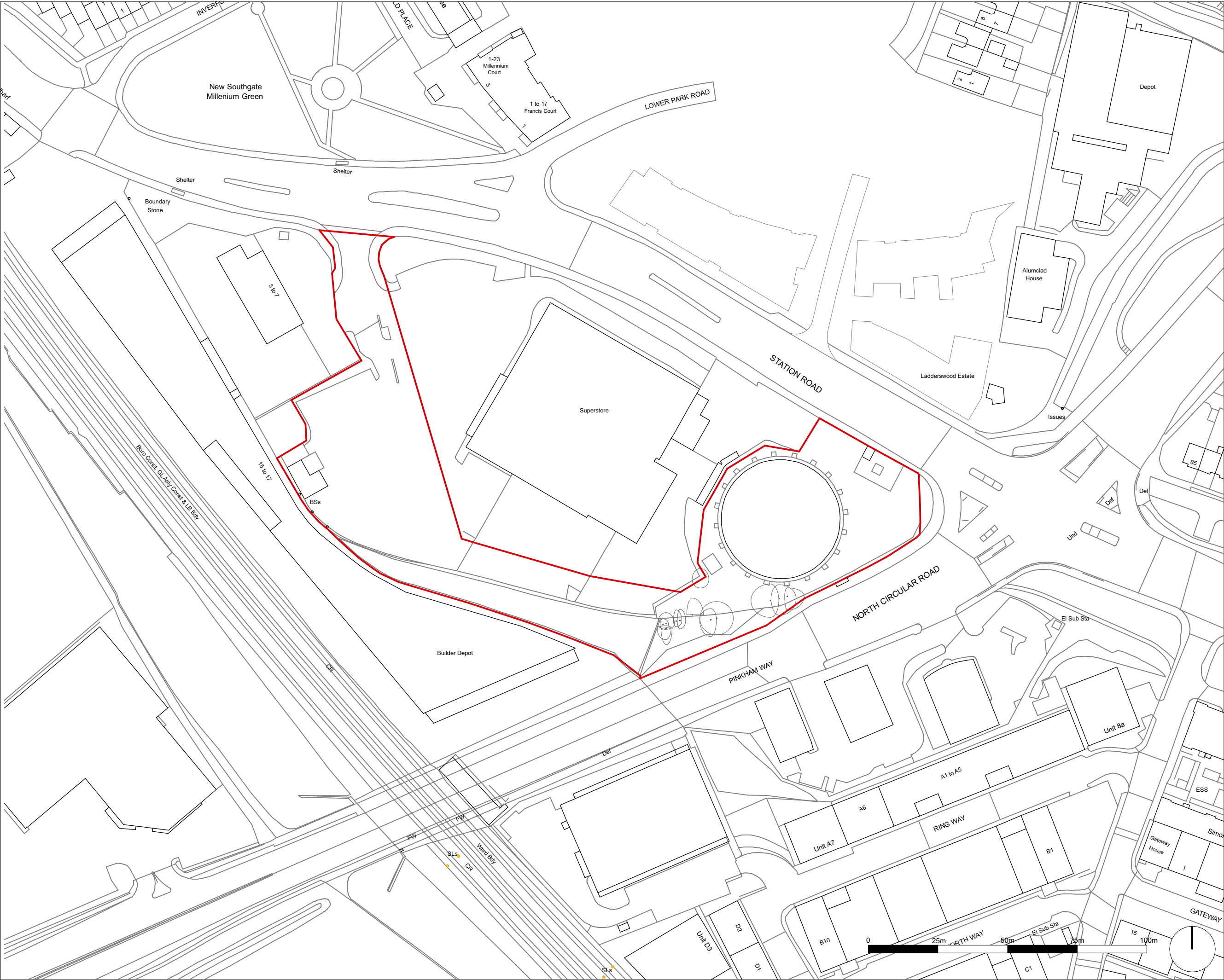
t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site
Project Address
Station Road, N11

Drawing Name
Proposed Upper Ground Floor

Status	Scale
PLANNING	A3 1:500

Proj. No.	Area	Dwg. No.	Type	Rev
0877	- X	- 0200.5	- GA	- P1



Copyright pH+.

No implied licence exists. This drawing should not be used to calculate areas for the purpose of valuation. Do not scale this drawing. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility. All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Revisions

P1	20.12.18	Issued for Planning
----	----------	---------------------

pH+

Puncher Hamilton Plus Ltd
Albion Mills
18 East Tenter Street
London, E1 8DN

t +44 (0)20 7613 1965
e mail@phplusarchitects.com
w www.phplusarchitects.com

Project Title
Gas Holder Site

Project Address
Station Road, N11

Drawing Name
Site Location Plan

Status PLANNING	Scale A3 1:1250
----------------------------------	---------------------------

Proj. No. 0877 - X - 0000 - GA - P1	Area	Dwg. No.	Type	Rev
--	-------------	-----------------	-------------	------------

This page is intentionally left blank

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 7th December 2021

Report of

Head of Planning
- Vincent Lacovara

Contact Officer:

Eloise Kiernan
Gideon Whittingahm

Ward:

New Southgate

Ref: 20/04193

Category: Full Application

LOCATION: Gas Holder site, Pinkham Way/Station Road, London, N11 1QJ

PROPOSAL: Redevelopment of the site to provide a mixed use development including the erection of two blocks ranging between 14 and 19 storey's in height, comprising of 182 residential units (Use Class C3), 371 sqm of commercial floorspace (Use Class E), common amenity space, together with accessible car parking spaces, bike parking spaces for residents and for the commercial use, hard and soft landscaping and associated works

Applicant Name & Address:

City and Suburban Homes
C/o Savills

Agent Name & Address:

Savills
33 Margaret Street
London
W1G 0JD

RECOMMENDATION:

1. That subject to the referral of the application to the Greater London Authority and the completion of a S106 to secure the matters covered in this report, the Head of Planning or the Head of Development Management be authorised to GRANT planning permission subject to conditions.
2. That the Head of Development Management/ Planning Decisions Manager be granted delegated authority to finalise the heads of terms and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

1. NOTE FOR MEMBERS

- 1.1 The application is reported to the Planning Committee for determination because it is categorised as a major development, involving more than 10 residential units in accordance with the scheme of delegation.

2.0 EXECUTIVE SUMMARY

- 2.1 The report seeks approval for the redevelopment of the site to provide a mixed use development including the erection of two blocks ranging between 14 and 19 storeys in height (not including the lower ground floor and roof level), comprising of 182 residential units (Use Class C3), 371 sqm of commercial floorspace (Use Class E), communal amenity space, together with accessible car parking spaces, bike parking spaces for residents and for the commercial use, hard and soft landscaping and associated works.
- 2.2 The site is identified as an 'opportunity site' (No. 2/3) within the Council's adopted North Circular Area Action Plan (NCAAP 2014 - 'New Southgate Neighbourhood Place'). NCAAP Policy 12 (New Southgate) establishes the principle of redeveloping the Application Site for residential led mixed use development.
- 2.3 The delivery of housing on underutilised brownfield sites in sustainable locations (close proximity to overground/underground, bus station) and within close proximity to a designated local centre has strong planning policy support and should be afforded substantial weight in the determination of the application.
- 2.4 Developing existing brownfield land protects the Boroughs can help in safeguarding greenfield and greenbelt land, thus preserving this important characteristic of Enfield – and is supported at all planning policy levels, nationally, London-wide and within Enfield's adopted development plan policies.
- 2.5 The proposal would support London Plan policies, which seek to increase housing supply and optimise site capacity. The site is assessed to be a sustainable location suitable for delivery of new high-quality housing – which is supported in principle. The introduction of flexible commercial space, or residential amenity space is supported in strategic and placemaking terms.
- 2.6 The proposed development includes 182 new residential units with a breakdown of 71 (1b2p (39%)), 69 (2b4p (38%)) and 42 (3b5p (23%)). Additionally, the scheme would provide 30% affordable housing with a breakdown of 70% social rent and 30% intermediate rent. This would contribute high quality housing stock to the Borough to meet housing need – which continues to rise in the Borough. The scheme would also provide improved local commercial services and facilities.
- 2.7 There is a pressing need for housing, including affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. Past delivery against housing targets accentuates this need and taking account of the presumption in favour of approving sustainable development and the tilted balance which currently applies, it is considered that the proposed development would deliver a high quality residential-led development on existing brownfield land – in a sustainable location. The site has a PTAL of 4 (6b being the best).
- 2.8 Overall, the proposal would make a meaningful contribution towards Borough and wider London housing needs – helping Enfield to support its growing population.

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 07 December 2021
Report of: Head of Planning Vincent Lacovara	Contact Officer: Andy Higham Dino Ustic David Gittens	Ward: Chase
Application Number: 21/02088/FUL		Category: Major
LOCATION: Holly Hill Farm, 305 The Ridgeway, Enfield, EN2 8AN		
PROPOSAL: Extension to existing scheme for land re-profiling for agricultural land restoration.		
Applicant Name & Address: Ms Avril Nevin Golf Environmental (UK) Ltd Stockley Park Golf Club Uxbridge UB11 1AQ Middx		Agent Name & Address: Mrs Suzi Coyne Suzi Coyne Planning 60 Blenheim Drive OXFORD OX2 8DQ United Kingdom
RECOMMENDATION: That the Head of Development Management / the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions.		

Ref: 21/02088/FUL **LOCATION:** Holly Hill Farm , 305 The Ridgeway, Enfield, EN2 8AN



1. Note for Members

- 1.1 The application has been brought to Planning Committee because the application is categorised as a major scheme and the fact the Council is land owner.

2. Recommendation

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

1. Approved Plans and documents
2. Detail of drainage features
3. Written Scheme of Investigation – post investigation assessment and subsequent analysis
4. Vehicles in excess of 7.5 tonnes delivery times
06:00 to 07:30 Monday to Friday, 09:00 to 18:30 Monday to Friday,
06:30 to 13:30 Saturday (excluding school holidays)
5. Maximum of 30 construction vehicle movements per hour at all times
6. Banksman on site at all times to manage HGVs entering and exiting the site
7. No traffic southbound towards Enfield
8. Material to be in accordance with an approved Environmental Permit
9. Verification report to be submitted on the suitability of the soil
10. In accordance with submitted transport statement
11. Landscape Strategy / Replacement Planting / Tree Protection
12. Tree Protection in accordance with Arboricultural Report
13. Temporary access road and access from the Ridgeway to be removed once the construction works on site ceases
14. Temporary diversion of public footpath to be maintained during construction and removed once the construction works cease
15. Development in accordance with the Ecology Impact Assessment
16. Agricultural Use Only

- 1.2 That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

2. Executive Summary

- 2.1 This report seeks approval for an extension to an existing scheme (approved under ref: 19/02850/FUL) for land re-profiling for agricultural land restoration. and improved visual and acoustic screening to the M25 and construction of an irrigation lagoon at Holly Hill Farm. This was granted planning permission by Planning Committee on 29.11.2019 and followed the principles established by an earlier permission granted in 2017. There have been no material change in circumstances in the interim with the adoption of the London Plan (2021) and revisions to the NPPF (2021) which do not alter the strategic policy framework in relation to this proposed development.
- 2.2 The reasons for recommending approval are:
- i) In the absence of any material change in circumstances, the principle of the development has already been established by the planning permissions granted under ref: 17/00477/FUL and 19/02850/FUL.
 - ii) The proposal will increase the productivity of agricultural land and overcome long standing drainage and soil quality issues on the site consistent with Policy DMD85.
 - iii) The scheme would be an appropriate form of development within the Green Belt that would not impact on the sites open and rural character having regard to Policy G2 of the London Plan, Policy CP33 of the Core Strategy and Policy DMD82 as well as the NPPF.
 - iv) The scheme would provide a visual and acoustic screen from the M25, and there would be no impact on the adjacent M25 with regard to structural stability or drainage matters consistent with Policies CP30 and 32 of the Core Strategy and Policy DMD 68
 - v) The soft landscaping and biodiversity will be greatly enhanced across the site having regard to Policies G6 and G7 of the London Plan, Policy 36 of the Core Strategy and Policies DMD78 and DMD79.
 - vi) The development would not impact on neighbouring residential amenity, the highway network or the safety of highway users having regard to Policy D1 of the London Plan, Policy CP30 of the Core Strategy and Policy DMD 48

3. Site and Surroundings

- 3.1 The application site comprises part of an agricultural holding located on the northern side of The Ridgeway known as Holly Hill Farm. There is an existing bund, approximately 3 – 5 metres above the height of the field, along the northern boundary with the M25 covered by a mixture of grasses. The site slopes steeply down from the south to the north of the site. There are a number of large veteran trees and hedgerows across the site. A public right of way runs along the eastern part of the site and there is an existing access track that runs north to south on the western side of the site. The site has been used for arable crop production.
- 3.2 The site is bounded by the M25 to the north while to the south of the site is St John's Senior School and North Lodge Farm. The site lies within the Metropolitan Green Belt, and Flood Zone 1 and within an area designated as an Area of Special Character and a site of archaeological interest.

- 3.3 Works have commenced on site in connection with the construction of a bund that was granted planning permission under reference 17/00477/FUL and more recently, application ref 19/02850/FUL. A temporary access and access road with spur roads and soil management area (SMA) were granted under the original permission on a temporary basis to enable the bund to be constructed: these works have been implemented and material imported around the site.
- 3.4 The application boundary has been amended from that of planning permission ref: 19/02850/FUL to include the area to the south of the approved scheme. This application is therefore being made to regularise the current position given the variations to the previous application and for the land reprofiling to be extended to the additional field.

4. Proposal

- 4.1 The proposal seeks to extend the existing permitted scheme (19/02850/FUL) for land re-profiling for agricultural land restoration at Holly Hill Farm.
- 4.2 The application site area is 4.12 ha and includes 0.38 ha of land within the area already permitted by the planning permission granted under ref:19/02850/FUL. This overlap between the two applications relates to the existing access road that has been constructed to facilitate the project. The re-profiling of the additional field would involve approximately 59,000 cubic metres of material.
- 4.3 Land levels will increase in height by between approx. 1 to 8 metres across the site with the largest increase in levels being from the north of the site to the southern boundary. The increase in the ground levels would not exceed the existing highest point on the site. The works will generally be set back away to the west elevation of the proposed irrigation lagoon by approximately 30 metres. New trees, hedgerows, wet grassland and wildflower areas would be planted. New culverts and swales are also proposed as part of the scheme.
- 4.4 The purpose of the scheme differs from that approved under reference no. 19/02850/FUL in that it comprises ground modelling for agricultural restoration purposes to improve the quality of the land. It should also be noted that the technical design of the scheme differs from ref 17/00477/FUL to ensure the ground modelling works addressed Highways England concerns the concerns about the structural integrity of the M25, where not repeated.
- 4.5 The scheme also captures works that have already taken place on site and which differ from the original permission: namely, the siting, length, width, bunding and height of the temporary access road and the size and bunding of the temporary Soil Management Area (SMA). Although these were not built in accordance with the approved plans, the current arrangements are acceptable.

5. Relevant Planning History

- 5.1 There is an extensive planning history on the site but the most relevant applications are as follows:

- 5.2 20/00763/CND - Details submitted pursuant to reference 19/02850/FUL: drainage (2) in respect of land reprofiling for agricultural land restoration and improved visual and acoustic screening to the M25 and construction of an irrigation lagoon. Granted on 21.08.2020.
- 5.3 19/02850/FUL - Land reprofiling for agricultural land restoration and improved visual and acoustic screening to the M25 and construction of an irrigation lagoon. Granted with conditions on 29.11.2019. Works commenced on site.
- 5.4 17/00477/FUL - Construction of soil bund screen to motorway boundary together with creation of irrigation storage lagoon and attenuation basin. – Granted subject to conditions on 04.12.2017. Works commenced on site.
- 5.5 17/00769/SO - Environmental Impact Assessment Screening Opinion Request under part 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011, as amended 2015 in relation to Construction of soil bund screen to motorway boundary together with creation of irrigation storage lagoon. Screening Opinion – EIA not required - Decision issued 7 March 2017

6. Consultation

Public Response:

- 6.1 Consultation letters were sent to 16 neighbouring properties. In addition, a press notice was published in the local newspaper and a site notice displayed at the site. No responses were received.

External Consultees:

- 6.2 *Environment Agency (EA)*: Although no objection was raised in connection with the previous application, the EA have advised in connection with this application that the consultation falls outside their remit and they will not be providing any comment.
- 6.3 *Highways England*: No objection subject to conditions relating to building in accordance with the approved plans and the submitted M25 bund monitoring strategy.
- 6.4 *Historic England*: Following revisions to the originally submitted Written Scheme of Investigation (WSI) to ensure it accords with relevant standards and guidance, no objection is raised.

Internal Consultees:

- 6.5 *Traffic & Transportation*: No objection subject to conditions relating to parking, access and deliveries.
- 6.6 *Tree Officer*: No objection subject to the tree protection being undertaken in accordance with the submitted details.
- 6.7 *SuDS Officer*: No objection subject to a condition requiring detailed design of all drainage features.

- 6.8 *Environmental Health Officer*: No objection subject to a verification report condition to demonstrate that the soil imported is suitable for use on agricultural land.

7. Relevant Policies

7.1 London Plan (2021)

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

Policy SI 2 Minimising greenhouse gas emissions
Policy SI 5 Water infrastructure
Policy SI 7 Reducing waste and supporting the circular economy
Policy SI 8 Waste capacity and new waste self-sufficiency
Policy SI 13 Sustainable drainage
Policy D1 London's form, character and capacity for growth
Policy D14 Noise
Policy HC1 Heritage conservation and growth
Policy G2 London's Green Belt
Policy G4 Open Space
Policy G6 Biodiversity and access to nature
Policy G7 Trees and woodland

7.2 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.

7.3 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.

CP24: The road network
CP30:
CP31: Built and landscape heritage
CP32: Pollution
CP33: Green Belt and countryside
CP36: Biodiversity

7.4 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:

DMD44 Preserving and Enhancing Heritage Assets
DMD47 New Roads, Access and Servicing
DMD 48 Transport Implications of New Development
DMD59 Avoiding and Reducing Flood Risk
DMD60 Assessing Flood Risk
DMD61 Managing Surface Water
DMD68 Noise
DMD78 Nature conservation
DMD79 Ecological enhancements
DMD81 Landscaping
DMD82 Protecting the Green Belt
DMD84 Areas of Special Character
DMD85 Land for Food and Other Agricultural Uses

7.5 Other Material Considerations

- National Planning Policy Framework (NPPF) 2019
- National Planning Practice Guidelines (NPPG)
- Enfield Characterisation Study (2011)

8. **Assessment**

8.1 The main issues arising from this proposal for Members to consider are:

1. Principle of Development
2. Green Belt
3. Impact on Adjoining Occupiers
4. Impact on Character
5. Contamination
6. Highway Issues
7. Impact on M25
8. Drainage
9. Trees, Landscape and Biodiversity
10. Environmental Issues

Principle of Development

8.2 The principle of the providing a bund was established through the original planning permission ref. no. 17/00477/FUL. This was on the basis that the proposal improved drainage across the site, created a natural barrier to the M25 thus reducing noise and created a visual improvement through the introduction of landscaping on the site. The proposal also sought to increase the yield of the farm, reduced overheads and enhanced the businesses viability of its operation – this remains applicable to the current proposal. It is worth noting that more recently the principle was reaffirmed under ref. no.

19/02850/FUL. This current planning application is for an extension to existing scheme for land re-profiling for agricultural land restoration and it is noted that there notwithstanding the adoption of the London Plan (2021) and revisions to the NPPF since that decision, there is no material change in policy that would affect the assessment of the proposal and its acceptability.

- 8.3 The new proposal will result in the re-profiling of the land to provide additional level areas that are more beneficial for farming practices. The new application site is smaller than the previously approved scheme and the proposal will involve the re-profiling of the land across the site rather than building a bund to the extent previously approved. An Agricultural Improvement Report was submitted with the application. The report sets out that significant gradients in areas can inhibit certain arable agricultural practices due to the practicalities of machinery moving across the terrain. This matter is dependable on the machinery employed to work the land and the cropping choice. However, the scheme would reduce these limitations with the improvements to the grading of the land across the site.
- 8.4 The site is currently affected by waterlogging and flooding which is due to the existing bund formation constructed during the M25 widening scheme. This impacts on the ability to manage the land and to grow crops. As a result, the productive agricultural use of the site has been limited. The development seeks to protect and improve the long-term quality of the farmland as the proposal has been designed to manage surface water runoff and improve drainage on the site. The changes to the land would also reduce the visual and acoustic pollution from the M25. The planning statement sets out that the proposal would increase the yield of the farm, reduce overheads and enhance the businesses viability. The construction of a water storage lagoon will give the farmer security and flexibility in the irrigation of crops. Being able to store water in the winter months when it is plentiful and using it during the summer months. Improvements to the drainage characteristics of the farmland will improve the growing conditions, lengthen the growing season and protect the soil resource for the future.

Green Belt

- 8.5 The site is located within the Metropolitan Green Belt. The National Planning Policy Framework (NPPF) (paragraph 79) states that 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. The NPPF confirms that inappropriate development is harmful to the Green Belt and should only be approved in very special circumstances and substantial weight must be 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 its inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 8.6 It also confirms that certain forms of development, such as engineering operations, are not inappropriate in the Green Belt providing that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The NPPF also confirms that in order to promote a strong rural economy, local plans should, amongst other considerations, “promote the development and diversification of agriculture and other land-based rural businesses”. It is considered that the proposed

works would be classed as engineering operations and thus, it is considered the proposal would present appropriate development.

8.7 The principles set out in the NPPF are reflected in Policy G2 of The London Plan (2021) and Policy DMD82 of the Development Management Document. Policy G2 of The London Plan (2021) states that the strongest protection should be given to London's Green Belt, in accordance with national guidance.

8.8 The issues to be considered are therefore:

1. Whether the proposal will assist in keeping the land open.
2. Should it be considered that it does not assist in keeping the land permanently open, whether very special circumstances exist to outweigh any identified harm.

8.9 It is recognised that there is an existing bund on the site. Due to the nature and scale of the proposal it is considered that the final scheme would keep the land open but at a higher level across the site. The SMA and the access road impact on the openness of the Green Belt, however the temporary nature of these features is acknowledged. They will not prejudice the continued use of the land for an appropriate Green Belt use once the works are completed as they will be removed. In this regard therefore, the development is considered acceptable in terms of its effect on the green belt.

Impact on Character

8.10 Policy CP30 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 DMD37 sets out criteria for achieving high quality and design led development.

8.11 Although areas of the site would increase in height by up to 8 metres the ground levels will not exceed the existing highest point on the site. The greatest increase in heights would be due to the infilling of existing valleys. Proposed trees and plants are proposed to be sited across the site. It is considered that the open and rural character of the area would remain.

8.12 The site falls within the farmland ridge and valleys landscape character – Turkey Brook Valley which has characteristics such as mature, well managed hedgerows with intermittent mature hedgerow trees and undulating landscapes. Visual impact assessments from a range of locations across the site have been provided to help understand the impact of the proposal. With the proposed land levels and the soft landscaping proposed across the site, in line with Policy DMD37, it is not considered that the proposed development would be inappropriate to its context or fail to have appropriate regard to its surroundings or the character of the surrounding area.

Impact on Adjoining Occupiers

8.13 The construction of the proposal could result in disruption to neighbouring sites. Given the nature of the proposal and its siting adjacent to the neighbouring sites to the south west– St John's Senior School and North Lodge, Farm it is

not considered that the proposed development would result in any demonstrable amenity harm to these properties or their occupants.

Contamination

- 8.14 The material to be brought in and used to implement the scheme must be suitable for use on agricultural land. Under the previously approved scheme ref no. 19/02850/FUL the spur roads from the main access road had been constructed at a raised height to prevent contamination.
- 8.15 The existing scheme is subject to compliance with the Earthworks Specification dated August 2019 which ensures that all material used for implementing the development is suitable for use on agricultural land. Further, the permission is subject to a condition requiring submission of a verification report to demonstrate the material's suitability. Reprofiting of the proposed extension area would be implemented fully in accordance with the existing approved Earthworks Specification and the submission of the required verification report would include the new extension area.
- 8.16 As such, the application proposal would comply with ELP Policy CP32, DMD Policies 64 and 65, and NPPF paragraphs 170 and 178 which aim to ensure that potential polluting emissions from development proposals are suitably controlled.
- 8.17 Environmental Health do not object to the application as there is unlikely to be any negative environmental impact. In particular there are no concerns regarding air quality or noise.
- 8.18 The Environment Agency (EA) have advised that the application falls out of the scope of the EA however previously suggested an informative condition would be necessary as any development using waste or other material for engineering works may require an Environmental Permit, unless it is exempt from the need for a permit. Waste transported to and from the development must only be carried by a registered waste carrier. The suggested condition and informative will ensure that the scheme does not lead to contamination.

Highway Issues

- 8.19 The main highway issues for this scheme relate to the transfer of ground material onto the Ridgeway, the safety of traffic using the Ridgeway during construction works and the safety of pedestrians and cyclists using the public footpaths. A Transport Statement and Construction Management Plan is submitted with the application.
- 8.20 A temporary access road is required to ensure the safety of the users of the nearby public right of way. Following the implementation of the scheme the access road will be removed. There is a car park to the front of the site to accommodate staff and visitors, and there is a wheel washing system in place that vehicles go through upon exiting the site. Deliveries from the site will take place from the west of the site, from the M25. The site will be open from 6:00 and 18:30 however a condition would be attached restricting the delivery times of HGVs. To ensure there is no significant impact on the highway network and highway users several conditions will be attached to any decision.

- 8.21 Transportation have confirmed that they do not have any concerns with the scheme subject to conditions. Subsequently, the proposal will not impact on highway safety or the operation of the local road network.

Impact on the M25

- 8.22 Highways England is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.
- 8.23 Highways England (HE) have been consulted on the scheme due to the potential impact that the development might have on the M25. HE raise no objection to the scheme on the basis that the proposal will not materially affect the safety, reliability and/or operation of the Strategic Road Network (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF 2021, particularly paragraphs 108 and 109) in this location and its vicinity.

Trees, Landscape and Biodiversity

- 8.24 Policy DMD80 of the DMD states that all development including subsidiary or enabling works that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value will be refused.
- 8.25 Policy DMD81 states that development must provide high quality landscaping that enhances the local environment. The National Planning Policy Framework has been updated to include policies surrounding veteran trees so that they are now recognised as hugely valuable to heritage, culture and ecosystem service provision. The relevant part of the NPPF is paragraph 175, these trees are considered sacrosanct and all development should be refused except for nationally important projects. Veteran trees are trees that are of exceptional interest biologically, aesthetically or culturally because of its age, size or condition. They are irreplaceable and are of exceptional ecological value.
- 8.26 An Arboricultural Impact Assessment and Method Statement have been submitted with the application. The report states that there are 18 individual trees across the site and 5 tree groups of these 17 are B grade trees of moderate quality, 4 are C grade trees of low quality and value and 1 U grade tree (located offsite) which are trees usually for removal (unless otherwise stated), with a life expectancy of less than 10 years. The findings of the report set out that there are no A grade trees. A Grade trees are of high quality and value with a life expectancy of more than 40 years.
- 8.27 It is however noted that there are oak trees with a life expectancy listed within the report that have a life expectancy of more than 40 years, some of which are veteran trees. However, the report states that some of the trees have significant deadwood throughout the crown and leaves have been stripped by the Oak Processionary Moth. It is proposed to remove and replace three B grade trees (Hornbeam and 2x Common Oak), part of mixed species native hedge (to be replaced) and 1 tree (Common Ash) both under grade C. No veteran trees are proposed to be removed.

- 8.28 There are no incursions into the RPAs of the retained trees. Veteran trees have been afforded a 15m exclusion zone where tree protective fencing has been linked between trees to improve the tree protection in these areas. The report states that the proposed drainage outlets and changes in soil levels will be outside of the RPAs of retained trees. All works will be carried out in accordance with BS 3998:2010 'Recommendations for Tree Work' (as amended) and to current arboricultural best practice. Tree protective fencing in accordance with BS5837:2012 will be required to ensure that the RPAs of the retained trees are safeguarded.
- 8.29 Although trees will be lost, new trees, hedgerows, wet grassland and wildflower areas will be planted. This will include ten heavy standard common oak trees with a 14 – 16cm girth to the north east of the site and along two hedgerows. The Tree Officer was consulted on the proposal and has raised no objection on the basis that the loss of trees is acceptable given the proposed mitigation of new soft landscaping.
- 8.30 Through Policy 36 of the Core Strategy the Council commits to 'protect, enhance, restore or add to biodiversity interests within the Borough'. This is reaffirmed in Policies DMD78 to DMD81. The National Planning Policy Framework (NPPF) recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including the establishing of coherent ecological networks that are more resilient to current and future pressures. Paragraph 175 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should therefore be encouraged.
- 8.31 Biodiversity improvements will be achieved through the planting of trees and hedgerows across the site. Significant soft landscaping is proposed across the site and it is considered that a high-quality landscaping scheme will enhance the local environment and character of the site.

Drainage

- 8.32 The NPPF requires site specific Flood Risk Assessments (FRAs) be carried out for developments proposed in flood risk areas. The site is located within an area of low risk of flooding, flood zone 1. The risk of surface water flooding across the site is low but is higher along the site's drainage features. Currently surface water is managed naturally via infiltration and/or overland flow into a network of drains/ditches that leads to culverts to convey water towards and across the M25 ultimately reaching the Turkey Brook, a tributary of the River Lee located along the northern edge of the M25. However, the existing drainage design, due to the bund and low soil permeability, has led to poor land drainage at the bottom of the hill between the existing bund and the fields ultimately leading to waterlogged soils and a reduction in available space for growing crops.
- 8.33 The scheme would incorporate ditches/swales and culverts to ensure appropriate and sustainable drainage of the land, as well as providing for attenuation areas to allow for climate change increases in rainfall. It has been explained that the lagoon would store water and give the farmer security and flexibility in crop irrigation by being able to store water in the winter months and

used in the drier summer months. The proposal would improve the drainage characteristics of the land, thereby enhancing growing conditions and lengthening the growing season. The scheme would increase the farm's productivity and decrease overheads by reducing the reliance on chemicals to promote yields and from the farm having its own irrigation water supply. The development would therefore help retain the land in agricultural use and secure the long term of viability of the farm business.

Archaeology

- 8.34 Historic England have reviewed the submission. Under the 17/00477/FUL and 19/02850/FUL planning permissions a condition was attached requiring the development to be undertaken in accordance with the approved written scheme of investigation and the programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material was required to be submitted on completion for review and sign off by the LPA – this will be applicable to the revised scheme.

Ecology

- 8.35 Policy DMD 85 Land for food and Other Agricultural Uses is a pertinent policy to consider with regard to the submission. The use of land for growing food, including commercial and community food growing, will be supported throughout the borough. Development on agricultural land will be permitted if the all of the following criteria are met:

- a. The proposal delivers diverse and sustainable farming enterprises without harming the quality or character of the countryside;
- b. The proposal, when implemented, ensures good environmental practice, including long term biodiversity benefits;
- c. The proposal safeguards high quality agricultural land from irreversible development;
- d. Proposals in relation to renewable energy sources do not over-farm the land to the detriment of the local character and ecology; and
- e. The type and volume of traffic generated would not result in danger or inconvenience on the public highway or harm the rural character of local roads.

- 8.36 An Ecology Impact Assessment has been submitted with the application. The proposal would not be contrary to parts a-e of Policy DMD 85 and the site would not have any impact to habitats and species of wildlife to warrant protection measures. The LPA consider a condition to be appropriate requiring the development to be undertaken in accordance with the approved Ecology Impact Assessment.

9.0 CIL

- 9.1 The development would not be CIL liable as there is no increase in floor space.

10.0 Public Sector Equalities Duty

- 10.1 In this instance it is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by

the Equality Act 2010 compared to those who do not have those characteristics.

11.0 Conclusion

- 11.1 The proposed development would help overcome existing drainage issues on the site thereby improving the overall agricultural quality of the land . This would be consistent with the objectives of the NPPF (2021) and Policies CP30 and 32 and Policy DMD 68. The proposal would also generate additional income for the farm while also enhancing the ecological and biodiversity of the land. Subject to further information and details that can be secured through conditions, the proposed development is considered to be an appropriate form of development within the Green Belt and would not result in any demonstrable harm to the open and rural character of the site, the highway network or the wider area.
- 11.2 The proposal is therefore considered acceptable for the following reasons:
- i) In the absence of any material change in circumstances or policy taking into account the adoption of the London Plan (2021) and revisions to the NPPF (2021), the principle of the development has already been established by the planning permissions granted under ref: 17/00477/FUL and 19/02850/FUL.
 - ii) The proposal will increase the productivity of agricultural land and overcome long standing drainage and soil quality issues on the site consistent with Policy DMD85.
 - iii) The scheme would be an appropriate form of development within the Green Belt that would not impact on the sites open and rural character having regard to Policy G2 of the London Plan, Policy CP33 of the Core Strategy and DMD82 as well as the NPPF.
 - iv) The scheme would provide a visual and acoustic screen from the M25, and there would be no impact on the adjacent M25 with regard to structural stability or drainage matters consistent with Policies CP30 and 32 and Policy DMD 68
 - v) The soft landscaping and biodiversity will be greatly enhanced across the site having regard to Policies G6 and G7 of the London Plan, Policy 36 of the Core Strategy and Policies DMD78 and DMD79.
 - vi) The development would not impact on neighbouring residential amenity, the highway network or the safety of highway users having regard to Policy D1 of the London Plan, Policy CP30 of the Core Strategy and Policy DMD 48



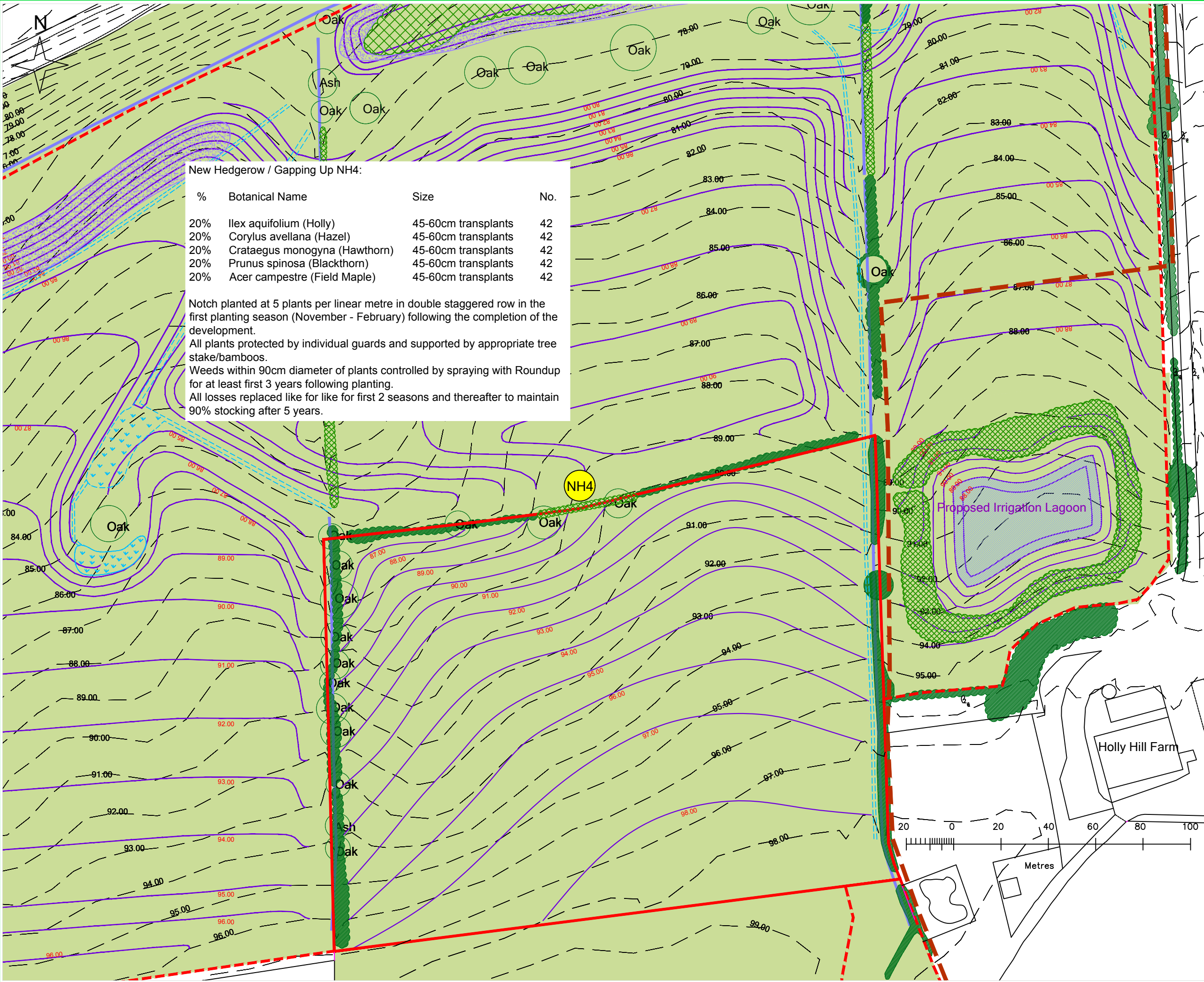
- LEGEND**
- Application site
 - Permission 19/02850/FUL area
 - Existing contours
 - Footpath diversion
 - Ditch/drain
 - Trees/hedgerow

Rev	Description	Date
© Crown copyright. All rights reserved. Licence number AL100036712.		
Client: Golf Environmental (UK) Ltd		
Project: Extension to Agricultural Restoration Scheme, Holly Hill Farm, Enfield		
Title: Existing Site + Enabling Works		
Drawn By:	Suzi Coyne	
Date:	May 2021	
Scale:	1:1500 @ A3	
Drawing No.:	297NFHH/2	

Suzi Coyne Planning

60 Blenheim Drive
Oxford, OX2 8DQ
Tel.: 01865 453747
Mob: 07779 099560

email: suzi.coyne@ntlworld.com



New Hedgerow / Gapping Up NH4:

%	Botanical Name	Size	No.
20%	Ilex aquifolium (Holly)	45-60cm transplants	42
20%	Corylus avellana (Hazel)	45-60cm transplants	42
20%	Crataegus monogyna (Hawthorn)	45-60cm transplants	42
20%	Prunus spinosa (Blackthorn)	45-60cm transplants	42
20%	Acer campestre (Field Maple)	45-60cm transplants	42

Notch planted at 5 plants per linear metre in double staggered row in the first planting season (November - February) following the completion of the development.
All plants protected by individual guards and supported by appropriate tree stake/bamboos.
Weeds within 90cm diameter of plants controlled by spraying with Roundup for at least first 3 years following planting.
All losses replaced like for like for first 2 seasons and thereafter to maintain 90% stocking after 5 years.

LEGEND

- Application site
- Permission 19/02850/FUL area
- Existing contours
- Proposed contours
- Existing ditch/proposed culvert
- Trees/hedgerow retained
- Proposed swale
- Proposed planting
- Footpath

Rev	Description	Date
© Crown copyright. All rights reserved. Licence number AL100036712.		
Client: Golf Environmental (UK) Ltd		
Project: Extension to Agricultural Restoration Scheme, Holly Hill Farm, Enfield		
Title: Proposed Landform		
Drawn By:	Suzi Coyne	
Date:	May 2021	
Scale:	1:1500 @ A3	
Drawing No.:	297NFHH/3	

Suzi Coyne Planning

60 Blenheim Drive
Oxford, OX2 8DQ
Tel.: 01865 453747
Mob: 07779 099560

email: suzi.coyne@ntlworld.com