# **Public Document Pack**



# **PLANNING COMMITTEE**

Tuesday, 29th March, 2022 at 7.30 pm Conference Room, Civic Centre, Silver Street, Enfield, EN1 3XA Contact: Jane Creer / Metin Halil

Committee Administrator

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#### **MEMBERS**

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

N.B. Involved parties may request to make a deputation to the Committee by contacting <a href="mailto:Democracy@enfield.gov.uk">Democracy@enfield.gov.uk</a> 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. 20/03011/FUL - MOORFIELD FAMILY CENTRE, 2 MOORFIELD ROAD, ENFIELD EN3 5PS (Pages 3 - 96)

RECOMMENDATION: That planning permission be refused.

WARD: Southbury

5. 21/03370/FUL - BUSH HILL PARK BOWLS TENNIS AND SOCIAL CLUB, ABBEY ROAD, ENFIELD EN1 2QP (Pages 97 - 146)

RECOMMENDATION: That the Head of Development Management be authorised to grant planning permission subject to conditions.

WARD: Bush Hill Park

# 6. 21/04791/RM - EXETER ROAD ESTATE, EXETER ROAD, ENFIELD EN3 7TW (Pages 147 - 202)

# **RECOMMENDATION:**

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

WARD: Ponders End / Enfield Highway

# 7. 21/03458/FUL - NORTH MIDDLESEX HOSPITAL, STERLING WAY, EDMONTON N18 1QX (Pages 203 - 246)

#### **RECOMMENDATION:**

- 1. That subject to the completion of a Section 106 Agreement to secure the matters covered in the report, the Head of Development Management be authorised to grant planning permission subject to conditions.
- 2. That the Head of Development Management be granted delegated authority to agree the final wording of the conditions and the Section 106 Agreement to cover the matters in the Recommendation section of the report.

WARD: Upper Edmonton

# 8. FUTURE MEETING DATES

Future meetings of the Planning Committee will be:

- 5 April 2022 Provisional
- 26 April 2022

#### **MUNICIPAL YEAR 2021/2022**

COMMITTEE:

PLANNING COMMITTEE 29.03.2022

**REPORT OF:** 

Head of Planning

## **Contact Officer:**

Planning Decisions Manager

David Gittens Tel: 020 8379 8074 Claire Williams Tel: 020 8379 4372 Gideon Whittingham (Interim)

Tel: 0208132 1623

AGENDA - PART 1	ITEM	3
SUBJECT -		
MISCELLANEOUS MATT	ERS	

# 3.1 APPLICATIONS DEALT WITH UNDER DELEGATED POWERS

**INF** 

- 3.1.1 In accordance with delegated powers, tbc applications were determined between tbc/02/2022 and tbc/03/2022, of which tbc were granted and tbc refused.
- 3.1.2 A Schedule of Decisions is available in the Members' Library.

## **Background Papers**

To be found on files indicated in Schedule.

# 3.2 PLANNING APPLICATIONS AND APPLICATIONS TO DISPLAY ADVERTISEMENTS

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.



PLANNING COMMITTEE		<b>Date:</b> 11 March 2022	
Report of: Head of Planning	Contact Officer: Andy Higham David Gittens Fidel Miller		<b>Ward:</b> Southbury
Application Number: 20/03011/FUL		Category: Major dwellings	
LOCATION: Moorfield Fa	mily Centre 2 Moorfield Road	Enfield EN3 5PS	
LOCATION: Moorfield Fa  PROPOSAL: Demolition	mily Centre 2 Moorfield Road  n of the existing building and to the desired th	Enfield EN3 5PS	residential developmer
LOCATION: Moorfield Fa  PROPOSAL: Demolition (Class C3) with associate	mily Centre 2 Moorfield Road of the existing building and to discourage and to disco	Enfield EN3 5PS  ne erection of a new oft landscaping, can the Name & Address new Lloyd-Ruck	residential developments rand cycle parking an
PROPOSAL: Demolition (Class C3) with associate amenity space. (Revised Damplicant Name & Address	mily Centre 2 Moorfield Road of the existing building and to d works including hard and description)  ss: deld Road Limited Age	Enfield EN3 5PS  ne erection of a new oft landscaping, can the Name & Address new Lloyd-Ruck	residential developme r and cycle parking ar

#### 1. Note for Members

1.1 Although a planning application for this type of development would normally be determined under delegated authority where recommended for refusal, in the interests of transparency given the scale of development, the application is reported to the Planning Committee for determination.

#### 2. Recommendation

- 2.1 The Head of Development Management be authorised to REFUSE planning permission for the following reasons:
  - The development by virtue of its size, bulk, massing, proximity and siting to neighbouring occupiers would give rise to an unneighbourly loss of sunlight and daylight and unneighbourly sense of enclosure, as perceived from neighbouring properties including Nos.4 16 Moorfield Road, 1 to 43 Moorfield Road and 253 to 273 Hertford Road, causing harm to the occupiers residential amenity, which having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation, contrary to Policies D3 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010), DMD8, DMD10 and DMD11 of the Enfield Development Management Document (2014) and the policies of the National Planning Policy Framework 2021 taken as a whole.
  - 2. The proposed development, by virtue of its siting, bulk, mass, lack of defensible space, poor quality outlook and proximity to existing and proposed replacement trees represents an overdevelopment of the site and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, fails to satisfactorily integrate with its surroundings negatively impacting on the enjoyment, function and safety of surrounding spaces, detrimental to and out of keeping with the character and appearance of the surrounding area which would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation. would cumulatively result in substandard accommodation and be harmful to the amenities of future occupiers,

contrary to Policy D6 of the London Plan 2021, the Nationally Described Space Standards 2015, Policies CP4 and CP30 of the Enfield Core Strategy 2010, Policy DMD6, DMD8 and DMD37 of the Enfield Development Management Document 2014

- 3. The proposed development, in the absence of a legal agreement securing contributions to the extension of the controlled parking zone, would contribute unacceptably to parking congestion in the surrounding area which would give rise to conditions prejudicial to the free flow and safety of vehicular traffic and pedestrians, and promote the use of non-sustainable modes of transport, contrary to Policies T6 of the London Plan 2021, Policy CP25 of the Enfield Core Strategy 2010, Policies DMD45, DMD47 and DMD48 of the Enfield Development Management Document 2014
- 4. The proposed development, by reason of its impact upon the preserved trees and the loss of B category trees at southern end of the application site would result in harm to amenity which having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation contrary to Policies DMD37 and DMD80 of the Enfield Development Management Document (2014), CP30 of the Enfield Core Strategy (2010), G7 of the London Plan (2021), the National Planning Policy Framework 2021 as a whole and the British Standard for Trees in relation to design, demolition and construction (BS 5837:2012)

# 3. Site and Surroundings

- 3.1. The site occupies a prominent position at the junction with Hertford Road, Carterhatch Lane and Moorfield Road. The site comprises a two-storey rectangular building, set back from Hertford Road and Carterhatch Lane with a car park to the rear off Moorfield Road.
- 3.2. The existing site building is rectangular in form and utilitarian in appearance, with several recessed elements and a central lightwell.
- 3.3. The existing building is now vacant, having previously been occupied by the Barnet, Enfield and Haringey Mental Health Trust, a local authority children services team

- and a GP Practice, all likely within Use Class E(e) Commercial, Business and Service. The site has recently been sold by the NHS as surplus to requirements.
- 3.4. The site building is largely obscured from public view, given its siting set back from the road and the presence of trees, several of which are the subject of tree preservation orders (TPO), and vegetation located on boundary, particularly along Hertford Road and Carterhatch Lane. Vehicular access to the site is via Moorfield Road, whilst pedestrian access is primarily via Carterhatch Lane.
- 3.5. The site is poorly connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 2 (poor).
- 3.6. The building is located within a busy mixed-use area, north-west of the Enfield Local Highway Local Centre, on Hertford Road (A1010). This is a main thoroughfare running north to south, where local centres and concentrations of activity, including a range of social and community uses such as schools, GP surgeries, open space and small parades of shops are located surrounded by built up neighbourhoods.
- 3.7. To the north of the site are the neighbouring properties of Nos. 4 -16 Moorfield Road, a two storey row of dwellings, the rear elevations and gardens of which, face onto and are contiguous with the full extent of the site.
- 3.8. To the east of the site is Hertford Road, beyond which are Nos. 233 249 Hertford Road (set to the north of Carterhatch Lane) and 253 273 Hertford Road (set to the south of Carterhatch Lane), a variety of building typologies from single to four storeys in height, primarily consisting of commercial activities at ground floor level with residential activities at upper floor levels, except No.241 Hertford Road, a purpose built residential block on the corner with Cedar Avenue.
- 3.9. To the south of the site is Carterhatch Lane, beyond which is No.43 45 Carterhatch Lane, one of several four to five storey purpose built residential blocks, along with a greened apex, consisting of several trees, at the junction with Hertford Road Carterhatch Lane.
- 3.10. To the west of the site is Moorfield Road, beyond which is No.1 43 Moorfield Road, one of several four to five storey purpose built residential blocks. The site is neither

located in or adjacent to a conservation area. The site is neither statutorily nor locally listed.

- 3.11. The following policy designations / characteristics apply to the site/adjacent to the site:
  - Southbury Ward
  - Flood Defence 100 year 1000m
  - North East Enfield Area Action Plan
  - Tree Preservation Order (TPO) (ref:403/2018): There are five trees sited along the boundary with Moorfield Road and Hertford Road.
  - Enfield Highway Local Centre

## 4. Proposal

- 4.1. The proposal seeks the following:
  - The demolition of existing two storey centre for the provision of medical and/or health services (1300sqm).
  - The redevelopment of the site to form a 9-storey residential block (height 33m) consisting of 106 flats in the following arrangement:
    - o 41 x 1 Bedroom 2 Person (of which 6 would be WC)
    - o 16 x 2 Bedroom 3 Person
    - o 35 x 2 Bedroom 4 Person (of which 6 would be WC)
    - o 14 x 3 Bedroom 5 Person
- 4.2. The redevelopment would include:
  - 106 flats which would be 100% Affordable Housing at London Affordable rents
  - 9,587sqm of residential floorspace (GIA)
  - 77sqm for the internal refuse facility at ground floor level (20 x 1100 litre Eurobins)
  - 155 sqm for the internal plant/servicing facilities at ground floor level
  - 142 sqm for the internal cycle parking facilities at ground floor level (192 cycle spaces)
  - 5 external Sheffield stands to the east of the site (10 cycle spaces)

- 2 car parking areas to the west of the site, accessed via Moorfield Road provide space for 9 vehicles.
- The north and south roof rooftop (7<sup>th</sup> floor level) would provide 2 x separate communal amenity spaces of 565sqm
- Private amenity space of 749sqm is proposed across the scheme
- The main roof (9<sup>th</sup> floor level) building would be include a green 'sedum carpet' roofed with Photovoltaics (PVs) and plant.
- Access to the building would be via two entrances (north and south) on the east facing elevation, each set within canopies.

#### 4.3. The detailed scheme includes:

- The 9-storey building follows a mansion block design approach that is 'H' shaped in plan, with the long elevations fronting Hertford Road and Moorfield Road. The building would be clad in light brickwork up to 6<sup>th</sup> floor level, whilst the top two floors would be recessed from each elevation and clad in a pale Corium tile. The fenestration and projecting balconies would consist of dark Granite Grey aluminium, with light surrounds and copings of Glassfibre Reinforced Concrete (GRC).
- The site contains 23 trees in total (five of which are covered by a TPO (T1, T3, T14, T15 and T20 as referenced in the Arboriculture Report). The proposal would require the removal of 16 trees (including one grouping), with 7 trees requiring pruning, reducing and lifting crowns of trees including all trees covered by a TPO.

#### Post Submission Changes

- 4.4 The initially submitted scheme, validated on 24.09.2020, described the following works:
  - The demolition of existing two storey centre for the provision of medical and/or health services (GIA)
  - The redevelopment of the site to form a 9-storey residential block consisting of 101 flats (Build-to-Rent (BtR) scheme) in the following arrangement:
    - o 38 x 1 Bedroom
    - o 51 x 2 Bedroom
    - o 14 x 3 Bedroom

- The ground floor level would contain commercial uses in the following arrangement:
  - 153.5sqm (GIA) of Commercial Use Class E Commercial, Business and Service
  - 128.5sqm (GIA) of Community Use Class F Local Community and Learning
- 4.5 The redevelopment included:
  - 50% Affordable Housing via 'fast track' 50% Private
  - 9,312 sqm (GIA) of residential floorspace
  - 155sqm for the internal refuse facility at ground floor level
  - 172 sqm for the internal plant/servicing facilities at ground floor level
  - 155 sqm for the internal cycle parking facilities at ground floor level
  - Sheffield stands to the east of the site
  - 2 car parking areas to the west of the site, accessed via Moorfield Road provide space for 10 vehicles
  - The north and south roof rooftop (7<sup>th</sup> floor level) would provide two separate communal amenity spaces
  - Private amenity space for each unit
  - The main roof (9<sup>th</sup> floor level) building would be include a green 'sedum carpet' roofed with Photovoltaics (PVs) and plant.
  - Residential access to the building would be via a central entrance on the east facing elevation, each set within canopies
  - Commercial access to the building would on the east and south facing elevations
- 4.6 At the request of the applicant, the offer of 50% affordable housing was withdrawn soon after validation of the application. As a result, an independent Financial Viability Assessment by BNP Paribas was undertaken on a 0% affordable housing contribution. The scheme however continued to be a Build-to-Rent (BtR) scheme.
- 4.7 At the request of the applicant, a revised scheme was formally submitted on 04.07.2021 for which this assessment relates. In summary, the changes include:
  - Omission of commercial uses at ground floor
  - Omission of Build-to-Rent (BtR) scheme
  - Increase in total number of units from 101 to 106

- 100% Affordable Housing offer
- Central building form moved west
- Amend ground floor entrances, plant, refuse and cycling spaces
- Increase number of units with dual aspect

# 5. Relevant Planning History

- 5.1 TP/03/0128 Demolition of existing Health Centre and construction of Primary Care Resource Centre (Outline Application.) Granted with Conditions on 20.06.2003.
- 5.2 TP/94/0911 Alterations to ground floor envisaging infilling existing open ground floor space, to provide additional health centre facilities. Granted with Conditions on 20.12.1994.

# Pre-submission applicant-led engagement

- 5.3 The current scheme stems from several previous Pre-applications, including meetings and workshops with Council officers, independent design review by Enfield Design Review Panel and presentation to the Greater London Authority.
- 5.4 18/03534/PREAPP Demolition of existing two storey building and single storey outbuilding and the erection of part 2, part 4, part 6 storey building comprising 51 market residential units (16x1 bed, 21x2 bed and 14x3bed) with 39 parking spaces, communal amenity space, bike storey and refuse.
- 5.5 Council's conclusion (Summary):

At this stage, there is an in-principle concern given the loss of existing health facility in an area of identified need. Further information and justification are required to satisfy either part a. or part b of Policy DMD17 in particular.

Subject to justification regarding the loss of the D1 use (either through alternative provision elsewhere or market demand analysis), it is considered a residential led scheme is considered acceptable. As raised, consideration should be given to active uses at ground floor to assist in terms of public realm and enhancement of a local centre.

The proposal should adequately address Moorfield Road and consideration given. The inclusion of a mews or podium parking may assist in better addressing and reinforcing the built form to this street. Further details would also be required in relation to the elevation treatment (materials, window, balconies) although the principle of four storeys and 6 storeys are considered acceptable.

The quality of accommodation is of concern at this stage given the number of single aspect units and the lack of private amenity space and proximity of parking to ground floor units.

Considering the above comments it is recommend the applicant significantly reappraise the scheme.

- 5.6 19/02891/PREAPP Demolition of existing two storey building and single storey outbuilding for the erection of part 2, part 4, part 6 storey building of 56 residential units (41% Affordable) (18x1 bed, 21x2 bed and 17x3bed). Date opened 13.08.2019
- 5.7 Council's conclusion (Summary):

Evidence is required to demonstrate the provision elsewhere of services (GP and all services to have taken place on site eg Mental Health) satisfactorily meets the needs of the existing and future needs of the community (population/likely demographic shifts etc) and future plans or programmes of provision of public sector bodies. Evidence is required to demonstrate through a marketing exercise, an alternative D1 provider can be found. An acknowledged demand in the borough (GP services or any other similar health care facility), should be incorporated within this scheme.

As per the meeting and previous pre-app, an account should be provided as to the alternative layouts explored, eg. mews, or podium parking with maisonettes wrapping at ground and first floor (to ensure dual aspect). An active frontage along the east facing ground floor elevation is to be encouraged, be it retail/office/healthcare uses.

The open space which it faces could easily become undefined and may become underused and be perceived as unsafe. Active uses could assist in enlivening the street and space, whilst enhancing the role and function of the Enfield Highway Local Centre which we would welcome.

The necessity to get an RP on board is vital and should be incorporated at this stage to ensure a suitable offer for a guaranteed end user. This is vital to ensure a viable scheme. Offers of interest should be sought at this stage.

The TPO trees are a noted constraint and have informed the layout and form of the proposed buildings. As a result of the arrangement of the units however, some single aspect units (and units generally) would be screened by said trees, thereby significantly reducing their quality of accommodation.

The limited defensible space at ground floor level is a concern. Increased defensible measures or boundary treatment might harm the open and enlivened aspirations for the eastern elevation space. The outlook of the units at ground floor level is considered poor and this space lends itself far better to commercial uses. Thought should be given to active uses at the ground floor to give a degree of activity to these semi-private spaces.

Single aspect units should be replaced with dual aspect accommodation

The number of car parking spaces proposed has been reduced (based on the previous scheme) to just 27 spaces. This is a concern for us, as based on the previously agreed calculation of 0.5 spaces per 1 or 2 bed flat and 1.5 spaces for the larger 3-bed units, our calculations are that 45 car parking spaces that should be provided, which is well within the emerging London Plan standard for a development in outer London with a PTAL of 2, of a maximum of 1 space per dwelling.

As the number of car parking spaces is key to the acceptability of this scheme, and an increase in car parking numbers would clearly need a significant redesign of the scheme, we would need to resolve this issue at the earliest stage.

The cycle parking is now proposed in both the private and social housing cores; please ensure that the split of the facilities reflects the number of flats accessed from each core, and please note that these must be accessible from the main entrances

of the site, and not just from the rear car parking area, as they must be conveniently located to encourage use. Please also clarify the position of the proposed visitor cycle parking – this must be suitably located so that it is overlooked and therefore both accessible and secure.

The developers must submit a site specific FRA to ensure that the development is safe from flooding and will not increase flood risk elsewhere

Please note that a number of 'principle' matters such as land use and affordable housing require resolution and the above advice does not indicate the scheme as presented is acceptable. The above is an offer to continue dialogue with the understanding these key matters be overcome by the applicant prior to submission of a full planning application.

- 5.8 20/00620/PREAPP Proposed redevelopment of site and erection of 100 residential units with community space (3 x options).
- 5.9 Enfield Place and Design Quality Panel's conclusion (Summary):
  - The panel appreciates early engagement with the design team and client on this key project. At this stage there are many ways the project can evolve and the panel offers several options for consideration.
  - The scheme is too tall in relation to its surroundings. Apart from the nearby highrise block (which itself is at an inappropriate height) the proposed building would be substantially higher than its surroundings.
  - Moving to a "mansion block" approach rather than a single tall building is welcomed.
  - The internal layout of the building is compromised in part by only having one core, which creates long, dark internal corridors serving a significant number of flats, resulting in poor quality internal circulation space.
  - Additionally, there is a high number of single aspect units which, by virtue of the difficulty of achieving cross-ventilation, provide a poor quality of accommodation for residents.
  - The rooftops provide almost all the communal amenity space; but are exposed to sun and wind and are difficult to access from parts of the scheme. Consequently, there is a danger both that they could be underutilised, and the residents lack

adequate recreational facilities. There may be an opportunity for further external communal amenity space on the ground floor (perhaps on the site of the car parking) and this should be investigated.

- The retention of the trees on the Hertford Road boundary is welcomed as it enables the continuation of the existing north south green link. along the west side of the road.
- Overall, the scheme is struggling to optimise the site. It is overdeveloped to the detriment of the design. The panel encourage the design team to review the viability of different numbers of units and flat mix to explore ways to deliver a contextual but ambitious and good quality scheme. One option might be to reexamine the space proposed for commercial and community space on the ground floor; although the desirability of crating active frontage on this important corner is recognised.
- 5.10 20/01797/PREAPP The demolition of existing two storey health centre; Redevelopment of the site to form a 10 storey and 7 storey residential block consisting of 103 flats (33 x 1 Bedroom 2 person, 56 x 2 Bedroom and 14 x 3 Bedroom 5 person). Date opened 10.06.2020. The development would include:
  - 9,219sqm of residential floorspace
  - 144sqm of 'community' floorspace at ground floor level
  - 161sqm of 'commercial' floorspace at ground floor level
  - 240sqm of communal amenity space at upper floor level
  - 9 car parking spaces to the west of the site
  - 177 cycle parking spaces (short term external, long term internal) located at ground floor level
  - A refuse facility located within the building at ground floor level

### 5.11 Council's conclusion (Summary):

The principle of the demolition of all buildings on site for their replacement could be acceptable, however several key matters remain outstanding and the LPA would not therefore be in a position to offer support for the scheme as its stands.

Significant engagement by the applicant with the LPA is required at this stage prior to a formal application being submitted; where the following key matters remain an impediment to receiving LPA support:

- The lack of a replacement community facility a communal/commercial space as part of a shared living experience would not fulfil this requirement.
- o The proposed height of the buildings at 10 and 7 storeys, rather than 6 storeys
- o The limited offer of dual aspect accommodation (LPA to agree classification)
- o The limited outlook for accommodation in proximity to retained trees.
- o The functionality of the rooftop amenity space
- The absence of an implemented CPZ (and cycling improvements) to ensure an agreed car free scheme.
- The pruning pressure on TPOs near the proposed building for good quality accommodation.

# 5.12 Greater London Authority conclusion (Summary):

The site was formerly in use as a healthcare facility. The supporting text for Intend to Publish London Plan Policy S1 sets out that social infrastructure covers a range of facilities that meet local and strategic needs and contribute towards a good quality of life, including healthcare provision, and that redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered. This policy also states that where social infrastructure providers are undertaking an agreed service re-provision or reconfiguration, losses from redundant sites may be acceptable. The applicant should provide background on why NHS services have vacated this site and seek verification from the Council that the site is not required to meet any alternative local social infrastructure need.

The applicant is proposing a 10-storey building, which could reasonably be considered a tall building given the predominantly low-rise context. Intend to Publish London Plan Policy D9 indicates that the location of tall buildings should be plan-led, placing the onus on LPAs to identify appropriate locations for tall buildings in Development Plans. In this instance, the Enfield Local Plan does not give specific guidance on suitable locations for tall buildings within the borough; therefore, the proposal must be evaluated on its own merits. This is discussed further in the Urban Design section below.

The applicant is advised that Build to Rent schemes must be held as such under a covenant for at least 15 years, with affordable provision secured in perpetuity, and a

clawback mechanism in place within the S106 to ensure that there is no financial incentive to break the covenant. The units must furthermore be self-contained, let separately, and benefit from on-site management.

Fast Track schemes are not required to submit viability information for scrutiny by GLA officers. In this instance the 50% public land threshold applies. To follow the Fast Track Route, Build to Rent schemes must provide the threshold level of Discount Market Rent (DMR) homes with at least 30% of the first 35% provided at London Living Rent (LLR) levels. The remainder should be provided at a range of genuinely affordable discounts below market rent based on local need to be agreed upon with the Council and the Mayor.

The applicant should engage with the local authority to ensure that the proposed unit size mix responds to local need

Following several revisions based on feedback from the LPA and Design Review Panel the proposal comprises a 10-storey element towards the south of the site and a 7-storey element to the north. The proposed height strategy introduces height and density along the busier Hertford Road and Carterhatch Lane. This facilitates the optimisation of this brownfield Opportunity Area site and helps to moderate the difference between the low-rise surrounding context and the existing 13-storey residential tower southwest of the site. Accordingly, the proposed scale and massing is supported in principle, subject to addressing the associated issues discussed in this report, as well as the assessment criteria within London Plan Policy 7.7 and Intend to Publish London Plan Policy D9.

As discussed at the meeting, there is some concern that the 10-storey block may overshadow the west-facing lower level units, potentially compromising the residential quality of units that would already have a relatively poor outlook over the servicing entrance and car parking provision. However, it is understood that the applicant is working to refine the design to address these issues. The applicant should continue to test and develop designs based on the emerging lighting studies to address any problematic results and ensure optimal natural light into the scheme's units and surrounding properties).

The addition of a second core is supported, as it creates better internal layouts, improves the interior circulation spaces, and reduces the provision of single aspect units.

The applicant has indicated that the TPO trees will be retained, which is positive. The applicant should also consider retaining or planting additional trees along the northern boundary to enhance the view from and buffer between the proposed development and the residential properties to the north. Additionally, the proposed car park and public realm would benefit from further refinement in terms of layout, landscaping and design.

The proposals improve the existing boundary treatment to the south making the site much more accessible and presenting active frontages onto Carterhatch Lane and Hertford Road. The open and ground level access to community facilities here is supported

The applicant must ensure that the provision of single aspect units has been minimised, and that all such units will have adequate passive ventilation, daylight and privacy, and avoid overheating. The proposed residential layout is developing to a high standard, achieving a high percentage of dual aspect units and efficiently designed cores. The proposed central entrance offers east-west permeability and visibility through the lobby. This is supported. As mentioned above, the applicant is exploring design solutions to improve the residential quality in lower level units on the west side of the building. This is strongly encouraged.

The roof terrace design is developing positively with appropriate detailing, such as high parapets to accommodate safe play. Further assessments such as wind testing and investigation into appropriate substrate depth are required to ensure that the proposed landscaping can be delivered. It may be useful to revise views of the building as this design progresses, including how the roof and building will look from surrounding neighbourhoods and the local high street with heritage assets.

The design concept and emerging materials look positive with high quality brick illustrated in the visuals. The applicant is encouraged to continue collaborating with the LPA on the materials and details to ensure the development complements the local character and heritage. As much detail as possible should be captured in the planning submission to ensure that a high-quality overall appearance is achieved.

The proposed development is car-free except for ten disabled spaces, which equates to 10% of the total number of residential units and is strongly supported. All of these spaces should be equipped with electric vehicle charge points to meet Intend to Publish London Plan standards and measures preventing overspill car parking from the development onto adjacent streets, such as a Controlled Parking Zone, should be secured by planning condition and S106 as appropriate.

The applicant's commitment to provide a policy compliant quantum of cycle parking is welcomed and based on materials provided a minimum of 173 long stay and 4 short stay cycle parking spaces should be provided. Cycle parking facilities should be designed in accordance with London Cycling Design Standards (LCDS) with each cycle storage area comprising no more than 100 spaces, 5% of spaces designed to accommodate larger cycles such as cargo or adapted bikes (at minimum), and visitor cycle parking provided at surface level or on-street. Additionally, cycle parking access should be welcoming to people of all abilities, enabling and encouraging all people to cycle.

The optimisation this brownfield site by way of a residential-led mixed-use development including a 50% affordable housing offer is strongly supported in principle, subject to confirmation from the Council that the site is no longer required for social infrastructure use. Any future application should address matters raised in the urban design, housing and transport sections of this report. Sustainable development matters were not discussed at the meeting. Any future application is expected to comply with the policies and guidance referenced in the sustainable development section of this report and the applicant is encouraged to submit a draft energy strategy for comment by GLA officers.

#### 6 Public Consultation

6.1 In December 2020, the Council adopted a Statement of Community Involvement (SCI), which sets out policy for involving the community in the preparation, alteration and review of planning policy documents and in deciding planning applications.

- 6.2 Initial consultation on the application involved notification letters being sent to 692 neighbouring properties on 19.10.2020 (giving people 28-days to respond), a site notice was placed on site on 07.10.2020 (giving people 28-days to respond) and a press advert in the Enfield Independent on 14.10.2020 (giving people 14 days to respond).
- 6.3 Following receipt of revisions and supplementary information, all information was published on the Council's website on 04.07.2021.
- In respect of the initially submitted scheme, 7 representations were received from neighbours (Moorfield Road, Cedar Avenue, Lytchet Way and Old Road) in response to notification and publicity of the application regarding:
- 6.5 Objections Table: Summary of Reasons for Comment:

Close to adjoining properties	2
Development too high	6
General dislike of proposal	3
Inadequate parking provision	7
Increase in traffic	4
Increase of pollution	2
Loss of light	4
Loss of parking	7
Loss of privacy	2
Noise nuisance	3
Over development	3
Strain on existing community facilities	5
Inadequate public transport provisions	2
Out of keeping with character of area	2
Close to adjoining properties	1
Affect local ecology	1
Conflict with local plan	1
	•

6.6 In respect of the revised scheme, no representations have been received from neighbours in response to the publicity of the application. Any comment subsequently received shall be reported at committee.

# 7 Internal Consultation

7.1 A summary of internal consultation responses these have been summarised in the table below.

Internal consultation response	nses
Consultee	Comments
Section 106	No comment
Education	No comment
Economic Development	No comment
Transportation	No objection, subject to conditions and contributions
Housing Renewal	The Council as a Strategic Housing Authority
	supports this application as it secures the delivery
	of 100% affordable housing.
Regeneration, Leisure	No objection
And Culture	
SUDs highways	No objection subject to conditions requiring
	Sustainable Drainage Strategy (pre-commencement
	other than for Enabling
	Works) and Verification Report.
SUDs	Objection raised
Health	No comments
Commercial waste	No comments
services	
Environmental Health	No objection raised subject to conditions.
Team	
HASC	No comments

Planning Policy	The proposal is acceptable in principle, however,
	more family sized units are required and the loss of
	non-residential use at the site has not been
	adequately justified.
Heritage And Design	No comments
Team	
Urban Design Team	Objection raised
Trees	Objection raised – see section # of this report.
Highways Team	No objection subject to legal agreement
Environmental Health	Environmental Health does not object subject to
	conditions.
Waste Management	No comment.
Energetik	Discussions are ongoing between the applicant and
	the Council's District Heat Network (DHN) setup
	company 'Energetik' with the intention of confirming
	that the development will link up to the network (noting
	that the development has been designed to be able to
	do so). Should a connection to the DHN prove
	unfeasible and/or unviable the applicants will move to
	their reserve strategy (as outlined in the planning
	application) which assumes an Air Source Heat Pump
	based solution.

# 8. Statutory and Non-Statutory Consultees

8.1 The consultation responses have directed and facilitated the changes to the development. If the proposed development was acceptable in all other respects a condition would have been attached to secure policy compliant development. A summary of statutory and non-statutory consultation responses are outlined in the table below:

Consultee	Comments
Metropolitan Police	No objection – subject to conditions
Service Designing	
Out Crime Service	

London Fire &	Any comment received will be reported at the meeting
Emergency	
Planning	
Thames Water	Raised no objection
	- Waste Comments
	Thames Water would advise that with regard to
	SURFACE WATER network infrastructure capacity, we
	would not have any objection to the above planning
	application, based on the information provided.
	Thames Water would advise that with regard to FOUL
	WATER sewerage network infrastructure capacity, we
	would not have any objection to the above planning
	application, based on the information provided.
	There are public sewers crossing or close to your
	development. If you're planning significant work near our
	sewers, it's important that you minimize the risk of
	damage. We'll need to check that your development
	doesn't limit repair or maintenance activities, or inhibit the
	services we provide in any other way. The applicant is
	advised to read our guide working near or diverting our
	pipes. https://developers.thameswater.co.uk/Developing-
	a-large-site/Planning-your-development/Working-near-or-
	diverting-our-pipes.
	Thames Water would recommend that petrol / oil
	interceptors be fitted in all car parking/washing/repair
	facilities. Failure to enforce the effective use of petrol / oil
	interceptors could result in oil-polluted discharges
	entering local watercourses.
	Water Comments
	- There are water mains crossing or close to your
	development. Thames Water do NOT permit the building
	over or construction within 3m of water mains. If you're

planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-ordiverting-our-pipes

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to

	read the Environment Agency's approach to groundwater
	protection (available at
	https://www.gov.uk/government/publications/groundwater-
	protection-position-statements) and may wish to discuss
	the implication for their development with a suitably
	qualified environmental consultant.
Greater London	The loss of the existing use is acceptable in strategic
Authority	planning terms. However, there are matters that need to be
	addressed to ensure full compliance with the London Plan
	and the Mayor's Intend to Publish London Plan.
Transport for	The following matters should be resolved before the application
London	can be considered in line with the transport policies of the Intend
	to Publish London Plan;
	Undertake Stage 1 Road Safety Audit for all highway
	proposal;
	proposal,
	Undertake further work on the ATZ assessment in light of
	comments; and secure appropriate financial contribution
	toward local pedestrian, cycle and public realm
	improvements;
	3. Secure the provision of cycle parking and approval of
	details by condition;
	4. Secure the provision of all car parking (including ECVP)
	and Car Parking Management Plan;
	and carr arking Management Flan,
	5. Secure legal restrictions to exempt future residents'
	eligibility for local parking permits and expand CPZ if
	needed;
	6. Remove the proposed car club space from the proposal;
	7. Provide justification for not providing off-street service;
	8. Secure the DSP and CLP by conditions;

	9. Improve the Travel Plan ensuring it contribute positively	
	toward the Mayor's sustainable travel goal and secure	
	them by s106 agreement; and	
	Secure appropriate Mayor CIL payment from the proposal toward Crossrail.	
Enfield	No comments	
Disablement		
Association		

# 9. Relevant Planning Policies

- 9.1. 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.
- 9.2. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Enfield Core Strategy (2010); the Enfield Development Management Document; and the London Plan 2021, which was published and became part of the statutory development plan on 2 March 2021.

The London Plan 2021

- 9.3. The London Plan was adopted in March 2021 and sets out a s spatial strategy that plans for London's growth in a sustainable way through to 2041. The scheme has been assessed against the policies of this Plan.
- 9.4. The following London Plan policies are considered particularly relevant:
  - GG1 Building strong and inclusive communities
  - · GG2 Making the best use of land
  - GG3 Creating a Healthy City
  - 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
- H1 Increasing housing supply
- H4 Delivering Affordable Housing
- H6 Affordable housing tenure
- H10 Housing size mix
- G1 Green Infrastructure
- G5 Urban greening
- · G6 Biodiversity and access to nature
- G7 Trees and woodlands
- S4 Play and Informal Recreation
- SI 1 Improving air quality
- SI 2 Minimising greenhouse gas emissions
- SI3 Energy Infrastructure
- SI4 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

- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding Transport Infrastructure Through Planning
- DF1 Delivery of the Plan and Planning Obligations

## <u>Local Plan – Overview</u>

9.5. 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 (2021) and 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

- 9.6. 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.
- 9.7. The following local plan Core Strategy policies are considered particularly relevant:
  - CP 2 Housing Supply and Locations for New Homes
  - CP 3 Affordable Housing
  - CP 4 Housing Quality
  - CP 5 Housing Types
  - CP 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 32 Pollution
- CP 34 Parks, Playing Fields and Other Open Spaces
- CP 36 Biodiversity

#### Local Plan - Development Management Document

- 9.8. 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.
- 9.9. 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
  - DMD10 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 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 55 Use of Roof Space / Vertical Surfaces
- 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 77: Green Chains
- DMD 79: Ecological Enhancements
- DMD 80: Trees on Development Sites
- DMD 81: Landscaping

#### Enfield Draft New Local Plan

- 9.10 The Council consulted on Enfield Towards a New Local Plan 2036 "Issues and Options" (Regulation 18) (December 2018) in 2018/19.
- 9.11 A second Regulation 18 'Main Issues and Preferred Approaches' document was approved for consultation on 9 June 2021. Public consultation concluded on 13 September 2021. This document identifies a preferred level of growth and sets out a preferred spatial strategy and related policies for accommodating growth. However, given the stage in the process, the Regulation 18 documents are considered to have very little weight in determining planning applications.

## National Planning Policy Framework (July 2021)

- 9.12 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives. A 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 well-designed, beautiful and safe places, 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 9.13 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.
- 9.14 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;
- 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.
- 9.15 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.

## Presumption in Favour of Sustainable Development

- 9.16 The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:
  - "(c) approving development proposals that accord with an up-to date development plan without delay; or
  - (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (7), granting permission unless:
  - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (6); or
  - 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.
- 9.17 Footnote (8) referenced here advises "This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years."

- 9.18 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.
- 9.19 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.
- 9.20 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.
- 9.21 In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the "presumption in favour of sustainable development" category.
- 9.22 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.

# National Planning Practice Guidance (NPPG)

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

# Other Material Considerations and guidance

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

#### 10. Assessment

- 10.1 The main planning issues to consider are as follows:
  - Principle of development

- Land use
- Character, Design, Scale and Height Considerations
- Affordable housing
- Housing need mix and delivery
- Standard of accommodation
- Residential amenity
- Accessibility
- Neighbouring Amenity Considerations
- Transportation, parking and highways
- Waste storage
- Trees and Landscaping
- Flood risk and drainage
- Environmental considerations
- Education
- Sustainable design and construction
- Security
- Fire Safety
- Equalities duty and human rights
- CIL

#### 11. Principle of Development

- 11.1. The NPPF and London Plan advise that local authorities should seek to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 11.2. The Borough's current target for the plan period is for a minimum of 12,460 net housing completions between 2019/20 2028/29, as set out in the London Plan 2021. In the event that the proposed development was acceptable in all other respects, the proposed 106 new dwellings would make a positive contribution towards meeting the strategic housing needs of Greater London and increasing the housing stock of the Borough in accordance with the National Planning Policy Framework (NPPF) and the Policy CP5 of the Enfield Core Strategy (2010). In this context, it is acknowledged the redevelopment of the site could help delivery and contribute to the Council's substantial housing delivery targets which is welcome.

11.3. It is also recognised that the Council has failed the most recent Housing Delivery Test and is therefore, residential development is subject to the presumption in favour of sustainable development. The tilted balance therefore has to be applied in assessing and weighing up the benefits of the scheme and whether on balance the impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.

#### 12. Land Use:

- 12.1. Policy S1D of the London Plan indicates that "Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities." The proposal and the evidence submitted appears to meet the aims of making best use of land.
- 12.2. Policies (DMD17) seek to resist the loss of existing social infrastructure while DMD17 sets out the approach to protection of community facilities. Taking each part of DMD17 in turn, part (a) indicates that proposals involving the loss of community facilities will not be permitted unless "a suitable replacement facility is provided to cater for the local community that maintains the same level of public provision and accessibility".
- 12.3. The existing medical facility was closed in 2017 and the site sold for alternative development. This followed a decision by the local NHS on the future delivery of health care facilities in the Borough and the transfer of services to Riley House. However, while it is noted that the former practice boundary is not covered in its entirety by the practice boundary of the new facility at Riley House, given the wider evidence provided by the NHS with respect to the need for consolidation of buildings, the accessibility of the alternate facility to the local community and the surgery at Brick Lane having spare capacity for c. 1,200 additional patients, it is considered this alternative methodology is acceptable.
- 12.4. It is accepted the new facility appears to be served by the same bus links and officers are also satisfied that disabled car parking levels are as a minimum the same as provided at the former facility. Consequently, while there is a change in accessibility, and Part A of DMD17 is not fully met, with reference to housing need and the tilted

balance, it is considered this issue given the overall availability of health care services is not of sufficient concern to justify a ground for refusal.

- 12.5. Part B of DMD17 requires evidence to be submitted that demonstrates "there is no demand for the existing use or any alternative community use" if part A cannot be met. 3.1.1 sets out a range of alternative community facilities which could include:
  - Recreation, leisure, culture and arts facilities, including theatres;
  - Libraries; adequate justification
  - Outdoor and indoor sports facilities;
  - Schools and other educational and training institutions;
  - · Facilities for early years provision; -
  - · Health facilities;
  - Day centres vulnerable adults and carers;
  - Community halls and centres;
  - Places of Worship;
  - Emergency service and policing facilities, accessible to the public.
- 12.6. Part G of the London Plan also indicates that "Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2)."
- 12.7. The applicant suggests that the marketing through ePIMS to other public sector bodies demonstrates there is no demand for alternative community uses. However, some of the facilities listed above would not be exclusively provided by public sector landowners, (i.e. places of worship).
- 12.8. In this regard, the applicant has provided further evidence, in the form of a Social Infrastructure Needs Assessment which includes a letter from Allsop, to demonstrate it has been considered for use as other forms of social infrastructure. The alternative uses which have been considered are underlined above with comments on the assessment provided after each use. It should also be noted that the originally submitted scheme did include community space at ground floor but following negotiations as to review viability and maintain housing numbers, it was accepted that the ground floor community space could be removed from the scheme.

12.9. For the reasons considered above and applying weight to the fcat that the health facility was relocated in 2017 and in the context of the Council's most recent Housing Delivery Test results on balance proposed development would be acceptable. The proposed development would therefore be acceptable when balanced against Policies DMD17 of the development management document 2016 and S1 of the London Plan 2021.

### 13. Character, Design, Scale and Height Considerations

- 13.1. According to Section 12 of the NPPF (2021) the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. Paragraph 126 confirms that "The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve" and that "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities." Policy D3 of the London Plan (2021) expects "all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity".
- 13.2. 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. This is echoed in Policy DMD8 which seeks to ensure that development is high quality, sustainable and has regard for and enhances local character.

#### Character and Townscape

13.3. The application site is rectangular in shape and located to the north of the Enfield Highway Local Centre. It is evident there is a variety of buildings in age, design and materiality within the vicinity of the site. It is bounded by Carterhatch Lane, Hertford Road and Moorfields Road. The site is located on a prominent corner of a busy junction. The trees around the perimeter largely obscure views into the site. The site

itself is covered by a large rectangular two storey building and single storey ancillary structure. Although large, it has a relatively low-key appearance within the townscape. The Site also has specific constraints, most notably in terms of tree Root Protection Areas. This site-specific constraint has influenced the form of the development.

- 13.4. The Enfield Characterisation Study identifies that the buildings in linear centres also lack the cohesiveness of the more mannered 'Metroland centres'. Enfield Highway Local Centre has elements which were built as part of interwar redevelopment. It is evident the centre features a variety of building types and periods. This gives considerable variety in scale, materials and details, within proximity to the application site.
- 13.5. The existing buildings on the site are also considered post war and of little architectural merit. These buildings are not designated heritage assets (neither being listed). There is no objection to their demolition and replacement, subject to appropriate design.
- 13.6. The site contains 23 trees in total (five of which are covered by a TPO (T1, T3, T14, T15 and T20 as referenced in the Arboriculture Report). The proposal would require the removal of 16 trees (including one grouping), with 7 trees requiring pruning, reducing and lifting crowns of trees including all trees covered by a TPO.
- 13.7. The proposal would involve the redevelopment of the site involving the construction of 9-storey building. The building would follow a mansion block design approach that is 'C' shaped in plan, with the long elevations fronting Hertford Road and Moorfield Road. The building would be clad in light brickwork up to 7<sup>th</sup> floor level, whilst the top two floors would be recessed from each elevation and clad in a pale Corium tile. The fenestration and projecting balconies would consist of dark Granite Grey aluminium, with light surrounds and copings of Glass fibre Reinforced Concrete (GRC). There would be 2 x main residential entrances that front onto Hertford Road. The proposed through route to the lobby is welcome and the 2-core approach is also a welcome addition which allows for a lower number of homes per floor / core and a greater sense of security and ownership.
- 13.8. In terms of the wider site, the siting of the building has been adjusted to facilitate continuation of a green buffer along the road to minimise impact on the existing trees.

As a result, the building does not align with the existing street pattern and sits at an angle to the line of buildings along Hertford Road.

# Tall Buildings (scale, height and massing)



- 13.9 The NPPF at Para 119 states Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions ....., in a way that makes as much use as possible of previously-developed or 'brownfield' land. Para 124 of the NPPF also states that planning decisions should support development that makes efficient use of land, taking into account:
  - 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;
  - 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.
- 13.10. 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.

- 13.11. London Plan Policy D9 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. The current development plan for the Borough does not identify suitable locations for tall buildings pursuant to the requirements of London Plan Policy D9. It can be noted that the Council's draft Reg18 local plan does not identify this land as an appropriate location for tall buildings.
- 13.12. DMD 43 classifies a tall building as over 30m as does the London Plan. The proposed development would rise 9 storeys with a maximum height of 33m. DMD Policy 43 (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 unless it can be demonstrated how the proposal avoids the negative impacts associated with the sensitive classification.
- 13.13. Paragraph 130 of the NPPF states that "Planning policies and decisions should ensure that developments are, C) are sympathetic to local character and history, including the surrounding built environment and landscape setting...; and d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- 13.14. 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?
- 13.15 Acceptability of a taller building in a particular location will be dependent on the detailed local context including the design of the building, the relationship to neighbouring propoerties, 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.
- 13.15. In addition, recent caselaw indicates that notwithstanding the plan led approach of London Plan Policy D9, the land does not have had to be identified as appropriate for tall buildings as long as it is appropriate for its location in terms of its design.
- 13.16. While the site is not located in a town centre but of the edge of a local centre and has reasonable public transport accessibility, the location of a tall building has generated a range of views and from an urban design perspective and there are concerns about whether this location for a tall building is appropriate questioning the justification on the basis of townscape legibility and its role as a focal point for development at this junction. In this regard, the balance is whether the benefits of the proposal in terms of housing delivery and provision of affordable housing outweigh the visual concerns associated with the 9 storey height of the development as proposed and whether this would have a negative impact on the legibility of the locality, when experienced as part of the Borough's existing townscape.
- 13.17. It is acknowledged that predominantly, the surrounding context for height is 4 storeys However, Hastings House does form part of the visual context for development on this site and has been put forward as a local precedent. It is certainly a significant feature in the local environment although it must be noted that the 2012 Report on Tall Buildings (which forms the evidence base for DMD policy) assesses this building as "Inappropriate Location, Inappropriate Building" (No. 30 Existing Tall building assessment map, pp 11.). Nevertheless, there are no proposals for replacement and thus its presence is a material consideration.
- 13.18. The proposed development is clearly a tall building within the context of adopted policy and would represent a significant addition to the built environment. It is acknowledged there are concerns about the suitability of this site to accommodate such a tall building and this needs to be weighed against the benefits in terms housing delivery and 100% London Affordable rent
- 13.19 Giving weight to the aforementioned benefits of the proposal and the presumption in favour and tilted balance, it is considered a height at 9 storey could be accepted on

part of the site in terms of its presence in the street scene. However, the resultant bulk and massing of this development particularly to it northern end results in unacceptable impacts to the residential amenities of neighbouring propoerties. This is discussed later in the report.

### **Articulation and Materiality**

13.20. The quality of brickwork, balcony detailing windows and surrounding lintels appears to be of a high quality and carefully considered and work well with the surrounding context. In the event that the proposed development was acceptable in all other respects a condition would have been attached that requires materiality details to be submitted to the Council and approved in writing.

### Conclusion of Character / Tall Building

- 13.21. Whilst there is a need for more housing in Enfield, development should be designed to optimise sites rather than maximise them. This proposal seems to be a case of maximisation rather than optimisation and overall, it is considered the proposals represent an overdevelopment of the site.
- 13.22. This proposal represents a significant development on a prominent corner site. It is acknowledged that the surrounding area has a variety of building styles and as a result, whicle Polies D9 (London Plan and DMD 43 are noted, taking account of the benefits associated with this proposal, in principle, a development involving height up to 9 storey is on balance, considered acceptable and would not unduly harm the townscape chacter of the locality sufficient to outweigh the benefits of the proposal.

### 14. Siting, Trees and landscaping

- 14.1. Policy DMD 80 requires the retention and protection of trees of amenity and biodiversity value on a site and in adjacent sites that may be affected by proposals. Policy DMD 81 ensures development must provide high quality landscaping that enhances the local environment.
- 14.2. The submission indicates that all trees covered by a TPO will be retained and protected as a result of the development. However, concern remains as to the relationship such trees are to have with the resulting building and quality of

accommodation therein. The Council's tree officer is of the view that the spatial relationship that would exist between the proposed building and the trees on the eastern site boundary would for the most part be unsustainable. The visual impact upon the street scene of Hertford Road that would result from the loss of B category trees (T8 and T12) on the southern boundary at the junction Carterhatch Lane is also of great concern.

- 14.3. Trees to the east (T17 and T16 and T14) have growth potential and would be subject to constant pruning pressure (not only from construction by following occupation) in such proximity to the proposed building. The T14 (London plane), would restrict levels of daylight / morning sunlight to the lower floors, particularly in the summer months when it is in leaf and continues to grow. The tree has considerable future growth potential.
- 14.4. At present the footprint of the proposed development would encroach within the canopy of the T17 (ash) has not been amended from the former design; at present, the footprint encroaches within the canopy of this tree quite considerably, especially at the northern corner where there would be balconies. As with the adjacent trees T14 and T15, this tree also has considerable future growth potential. The arboricultural report states that the tree's western canopy spread would only need to be reduced by 3m to facilitate construction. However, the Council's Tree officer considers this to be a gross under-estimation/generalisation. It is estimated that the amount of the reduction required to be at least 4.5m directly to the west, as the western flank of the proposed building projects approximately 3.5m beyond the existing; this would increase to approximately 6.5m at the north eastern corner of the building where the balconies would be situated. In both orientations, 1m of additional pruning has been added to allow for scaffolding and clearance from the building post-construction.
- 14.5. Aside from the inappropriate, excessive pruning that would be necessary to accommodate the proposed building, repeated pruning would be necessary post-construction to maintain clearance from the building and balconies. Another case of foreseeable post-development pressure due to poor spatial relationship between trees and buildings. The trees future growth and likelihood of post-development pressure has not been considered within the arboricultural report.

- 14.6. Although not preserved the trees at the southern end of the site at the junction of Hertford Road and Carterhatch Lane do form a coherent group of high visual amenity, on account of their prominent location. The quality between them does vary, but there are certainly two that merit retention T8 (Norway maple) and T12 (ash) although they are not subject to a TPO
- 14.7. For the reasons considered above the proposal by reason of its impact upon the preserved trees and the loss of B category trees at southern end of the application site would harm the visual amenity of the area and not comply with the policies outlined above.

### 15. Housing Need & Delivery

- 15.1 The current London Plan sets a target for the provision of 52,287 new homes across London each year with Enfield identified as contributing a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the previous target of 798. Notwithstanding, only 51% of approvals in the Borough have been delivered over the previous 3-years meaning that unit approvals must exceed this figure considerably if the targets are to be met.
- 15.2 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 now adopted London Plan (2021) targets.
- 15.3 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.

- 15.5 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.
- 15.6 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).
- 15.7 As mentioned elsewhere in this report, Enfield is a celebrated green Borough, with close to 40% of our Borough currently designated Green Belt or Metropolitan Open Land, and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. The reality of these land designations means the call on optimisation of our brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to transform.
- 15.8 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.
- 15.9 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 such as this particularly those that are currently underused and not delivering any benefit to the wider area.

### 16. Affordable Housing

- 16.1 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The NPPF 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 Policy H4 sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable.
- 16.2 Enfield sets a Borough-wide affordable housing target of 40% in Core Policy 3 but acknowledges the appropriate figure will need to take into account 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.
- 16.3 DMD 1 supporting text notes that affordable housing comprises three tenures: social rent, affordable rent, and intermediate housing. Enfield's Development Management Document Policy DMD 1 (Affordable Housing) states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need.
- 16.4 Following discussions, the proposed development as revised, would now deliver 100% affordable housing with all the units available at London Affordable Rent in excess of policy requirements. This is achieved through the allocation of grant funding from the GLA.
- 16.5 Due to the 100% affordable offer, Policy H5 (Threshold approach to applications) identifies this as a fast track application. Fast tracked applications are not required to provide a viability assessment at application stage.
- 16.6 A qualifying criterion does require the local planning authority to be satisfied regarding the tenure mix with Policy H5 stating: Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the Borough or the Mayor where relevant.

- 16.7 Policy H6 of the London Plan (Affordable Housing Tenure) advises that the following split of affordable products should be applied to residential development:
  - a minimum of 30 per cent low-cost rented homes, as either London
     Affordable Rent or Social Rent, allocated according to need and for
     Londoners on low incomes
  - 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
  - 3) the remaining 40 per cent to be determined by the Borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- 16.8 The 2017 SHMA shows London's significant need for low-cost rental housing which is reflected in priorities for our own Borough; There is therefore presumption that the 40 per cent to be decided by the Borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.
- 16.9 In this instance the tenure mix of 100% London Affordable Rent is acceptable. The London Plan is committed to delivering genuinely affordable housing and within the broad definition of affordable housing, the Mayor's preferred affordable housing tenures includes London Affordable Rent.
- 16.10 London Affordable Rent is for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. Rents are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF.

## 17. Housing need mix and delivery

17.1 The proposed dwelling mix is set out in the bable below and it is recognised that number of family units (13%) family units falls significantly short in provision of Policy CP5.

Proposed Dwelling Size Mix					
Dwelling Size	Number of Homes	Percentage			
1B2P	41	38%			
2B4P	51	48%			
3B5P	14	13%			
Total	106	100%			

Adopted LBE Policy (Core Policy 5) criteria							
Market Housing Social Rented Housing							
1 and 2 bedroom flats	20%	20%					
2 bedroom houses	15%	20%					
3 bedroom houses	45%	30%					
4 bedroom houses	20%	30%					

- 17.2 Officers have assessed the scheme in accordance with London Plan (2021) policies as well as having regard to the Council's development plan policies and the Council's current and emerging evidence around housing need. It is acknowledged the proposed mix is significantly weighted towards the 1 & 2 bedroom units which is not immediately consistent with local need and as a result there would be a preference for more larger family accommodation.
- 17.3 The proposed mix has been the subject of discussion to maximise the number of family units and he final position does have to be viewed in the context of the housing delivery test and the presumption in favour of approving sustainable development.

  Moreover, the current offer of 100% affordable housing at London Affordable Rent is significant and can be attributed considerable weight in the assessment
- 17.4 Taking this into account, and the tilted balance in favour of approving schemes for residential development, it is considered the low percentage of family housing can be accepted but only in the context of the location and the 100% LAR affordable housing offer which would be secured through a legal agreement.

### 18. Standard of accommodation

- 18.1 The NPPF (Section.12) identifies good design as a key aspect of sustainable development, stating that 'the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'.
- 18.2 Policy D6 of the London Plan sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space.
- 18.3 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. Despite the adoption of the London Plan 2021, the Housing Supplementary Planning Guidance Document (2016) remains an adopted document and a material consideration in decision making. The DMD contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing).
- 18.4 The table below illustrates the residential (Houses and flats) compliance with national floorspace respective of the units sizes.

Unit Size	Floorspace provision range	Minimum floorspace expected	Accordance with criteria
1B2P	50m² – 57.1m²	50m²	Υ
2B3P	64m2 - 70.9m -	61m2	Y
2B4P	70m² – 92.1m²	70m²	Y
3B5P	88.7m² – 91.4m²	86m²	Υ

18.5 Dual aspect accommodation in the interests of outlook and ventilation should be sought for all accommodation as a minimum, and this scheme fails to provide it in this instance. Rather, the proposal would provide 'enhanced' single aspect accommodation by virtue of high level windows or an angled window onto the same aspect. This site is not constrained to the extent that this needs to occur and should therefore be reviewed accordingly.

- 18.6 A concern remains as to the outlook afforded to a number of flats facing onto trees. This needs further consideration as in many cases the outlook is considered to be poor, particular from single aspect units. Although the applicant has indicated the outlook would be 'green' and that the relevant sunlight and daylight—assessments are not required, the LPA recognise that this relationship would not be beneficial for functioning residential accommodation and would place future pressure on their retention.
- 18.7 Although the level of dual aspect accommodation is 62.2%, there is no minimum number specified in London Plan D6 which the policy requiring the provision of dual aspect homes should be maximised in developments (New London Plan D6A). Although it is considered more dual aspect accommodation could be provided, given the tilted balance that applies, it is considered the scheme is acceptable and no grounds to refuse planning permission could be sustained on this point alone
- 20.1. The table below shows the analysis of dual aspect through the scheme.

Floor	Dual Aspect	Single Aspect	Total
GF	6 (75%)	2 (25%)	8
1F	9 (64.2%)	5 (35.7%)	14
2F	9 (64.2%)	5 (35.7%)	14
3F	9 (64.2%)	5 (35.7%)	14
4F	9 (64.2%)	5 (35.7%)	14
5F	9 (64.2%)	5 (35.7%)	14
6F	9 (64.2%)	5 (35.7%)	14
7F	3 (42.8%)	4 (57.1%)	7
8F	3 (42.8%)	4 (42.8%)	7
Total	66 (62.2%)	40 (37.7%)	106

### 21. Accessibility

- 21.1. 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. 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:
  - 1. At least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings',
  - 2. all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.'
- 21.2. Local Plan DMD Policy 8 has similar policy objectives.
- 21.3. It is noted that at least 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. In the event that the proposed development was acceptable in all other respects a condition would have been attached that requires the proposed development to comply with the above outlined standards.

## 19. Residential Amenity

#### Daylight/sunlight for Future Occupiers

22.1. The submitted Daylight/Sunlight assessment includes an analysis of whether the Proposed Development will receive adequate daylight/sunlight in the units and in public and communal amenity areas. In summary, the conclusions are:

## **Ground floor level:**

22.2. Concern as to lack of defensible space / the requirement for privacy screens (likely 1.8m) and obscure glazing, proximity to trees (existing and those as part of the planting strategy) compounds access to outlook and sunlight

# 1st to 6th Floor:

- 22.3. Concern as proximity to trees (existing and those as part of the planting strategy) compounds access to outlook and sunlight for east and north facing units (potentially west for new trees) See ADF also with ground floor next to trees and others that also share below criteria NSL (absence of corresponding daylight distribution)
- 22.4. Potential oblique mutual overlooking with neighbours to the north (12.2m to boundary
   18m to elevation) some screening by retained trees would mitigate this (would mainly be central area).

### 7th to 8<sup>th</sup> Floor:

22.5. There are primarily single aspect units at these levels with (E and W) window openings.

#### Annual probable sunlight hours

22.6. Annual probable sunlight hours (APSH) for the new units is BRE compliant – however this fails to account for likely screening of trees and privacy screens

Overshadowing - Public and Communal Amenity Areas (Sunlight on the ground)

22.7. The majority of garden space receives at least 68.89% of 2 hours of sun which would be acceptable.

### <u>ADF</u>

22.8. The table below indicates that there are window openings to habitable rooms throughout the proposed development that do not meet minimum BRE criteria.

Unit number	Floor	Room ID	Room Use	ADF Value	Meets BRE criteria
U1	First	R1	LKD	1.55	NO
U1	Second	R1	LKD	1.65	NO
U1	Second	R3	Bedroom	0.83	NO
U1	Third	R1	LKD	1.77	NO

U1	Third	R3	Bedroom	0.86	NO
U1	Fourth	R1	LKD	1.84	NO
U2	Seventh	R2	LKD	1.56	NO
U2	Eighth	R2	LKD	1.1	NO
U3	Seventh	R2	LKD	1.41	NO
U4	Seventh	R1	LKD	1.25	NO
U5	First	R2	LKD	1.42	NO
U5	Second	R2	LKD	1.45	NO
U5	Third	R2	LKD	1.47	NO
U5	Fourth	R2	LKD	1.48	NO
U5	Fifth	R1	LKD	1.48	NO
U5	Seventh	R1	LKD	1.54	NO
U6	First	R1	LKD	0.89	NO
U6	Second	R2	LKD	0.93	NO
U6	Third	R2	LKD	0.97	NO
U6	Fourth	R2	LKD	1.01	NO
U6	Fifth	R1	LKD	1.04	NO
U6	Sixth	R1	LKD	1.39	NO
U6	Sixth	R1	LKD	1.39	NO
U7	Second	R3	LKD	1.17	NO
U7	Third	R3	LKD	1.23	NO
U7	Fourth	R3	LKD	1.27	NO
U7	Fifth	R2	LKD	1.28	NO
U7	Sixth	R3	LKD	1.56	NO
U7	Seventh	R1	Kitchen	1.8	NO
U8	First	R1	LKD	1.00	NO
U8	Second	R1	LKD	1.12	NO
U8	Third	R1	LKD	1.17	NO
U8	Fourth	R1	LKD	1.22	NO
U8	Fifth	R1	LKD	1.25	NO
U8	Sixth	R1	LKD	1.64	NO
U11	First	R4	LKD	1.8	NO
U11	Second	R1	LKD	1.75	NO
U14	Ground	R2	Kitchen	1.3	NO
U14	First	R2	Kitchen	1.4	NO

U14	Second	R1	Kitchen	1.43	NO
U14	Third	R2	Kitchen	1.44	NO
U14	Fourth	R1	Kitchen	1.46	NO
U14	Fifth	R2	Kitchen	1.47	NO

### Internal Lighting conditions

22.9. Officers are unable to ascertain which rooms the ADF relates to based on the details submitted. This is because the unit numbers and room IDs do not correlate to any of the diagrams submitted. In the absence of these details and daylight distribution values with units, there remains a concern that the proposed development would not be would acceptable in this regard.

### Outlook

22.10. It is noted that poor levels of outlook would be experienced by ground, first and second floor flats due to the lack of defensible space at ground floor level and the encroachment of the trees to the west and north of the footprint of the proposed development. This element of the proposed development is considered to be unacceptable.

### Child Playspace and Recreation Space and Landscaping

- 19.1. The rooftop garden is potentially susceptible to high winds and an inclement microclimate. It must be demonstrated that this will be a functional and safe. Parking bays are not ideal and could be better used to provide amenity. On street parking, or a rearrangement of the pavement could be used to provide street-based parking and free up space on site for play and greening. In the event that the proposed development was acceptable in all other respects a condition would have been attached requiring details of hard and soft landscaping to be submitted to the Council and approved in writing.
- 22.11. Policy S4 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child, with

further detail provided in the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.

22.12. The applicant has calculated a playspace provision requirement of 404 sq.m. The development provides a total of 425sq.m of playspace aimed at children aged 0-4. Given the physical constraints of the site, the provision of offsite play space for older children is considered appropriate. It is noted that each play space is accessed by separate cores, in accordance with policy S4 London Plan, it must be demonstrated that playspace and equipment within the development is not segregated by tenure.

### **Amenity Space**

22.13. DMD 9 outlines minimum private outdoor amenity space provision standards. London plan policy D6 states that where there are no higher local standards a minimum of 5sqm should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. The London plan housing SPG indicates that where it is not possible be provide outdoor amenity providing in excess of the minimum space standard may be acceptable. The proposed development's compliance with these standards are outlined in the table below:

Unit Size		Floorspace provision range (sqm)	Standard (sqm)	Proposed (sqm)	Accordance with criteria
Ground floor	1B2P	50	5	11.19	Yes
	1B2P	57	5	4.43	Yes
	1B2P	53	5	5.4	Yes
	2B4P	76	7	7.7	Yes
	2B4P	71	7	6.67	Yes
	2B4P	70.5	7	6.74	Yes
	3B5P	70	8	8.33	Yes
	3B5P	71	8	8.47	Yes
				_	
	1B2P	51	5	5.69	Yes

Floors	1B2P	57	5	5.47	Yes
1 – 6	1B2P	50	5	5.5	Yes
	1B2P	51	5	5.38	Yes
	1B2P	53	5	5.4	Yes
	2B3P	71	6	7.67	Yes
	2B3P	71	6	7.39	Yes
	2B4P	70.63	7	6.53	Yes
	2B4P	71	7	6.65	Yes
	2B4P	92	7	6.85	Yes
	2B4P	76	7	9.69	Yes
	2B4P	76	7	7.95	Yes
	3B5P	89	8	8.58	Yes
	3B5P	92	8	8.7	Yes
Floors 7 – 8	1B2P	50	5	5.62	Yes
7 - 0	1B2P	51	5	5.38	Yes
	1B2P	51	5	5.47	Yes
	1B2P	57	5	5.42	Yes
	2B3P	64	6	10.21	Depth of majority of the balcony needs to be increased.
	2B3P	64	6	10.89	Depth of majority of the balcony needs to be increased.
	2B4P	76	7	9.7	Yes

22.14. For the reasons outlined above the proposed development would be satisfactory in respect to the level or residential amenity provided. Concern is raised over the narrow balconies and 7<sup>th</sup> and 8<sup>th</sup> floor levels, however, this shortfall is considered to be within an acceptable tolerance.

### Summary of Residential Quality and Amenity

22.15. Levels of access to natural daylight and sunlight/daylight distribution values have not been submitted. Therefore, officers are unable to ascertain whether the impact identified would be would be within an acceptable tolerance.

### 20. Neighbouring Residential Amenity

23.1. London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Lastly Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

BRE Guidance - Daylight and Sunlight:

- 23.2. 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.
- 23.3. BRE Guidelines paragraph 1.1 states: "People expect good natural lighting in their homes and in a wide range of non-habitable buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by". Paragraph 1.6 states: "The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...".

BRE Guidance - Daylight to Existing Surrounding Buildings:

- 23.4. The BRE Guidelines stipulate that... "the diffuse daylighting of the existing building may be adversely affected if either: the VSC [Vertical Sky Component] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value." (No Sky Line / Daylight Distribution).
- 23.5. At paragraph 2.2.7 of the BRE Guidelines it states: "If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the development in place is both less than 27% and less than 0.8 times is former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time."
- 23.6. The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.'
- 23.7. The applicant has suggested that the reduced measure of VSC of 18%, as opposed to 27% should be used the consider this scheme as they are of the opinion that the existing/proposed building relationships are more akin to urban configurations similar to mews type development.

BRE Guidance - Sunlight to Existing Buildings:

23.8. The BRE Guidelines (2011) state in relation to sunlight at paragraph 3.2.11: "If a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be

adversely affected. This will be the case if the centre of the window: Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and Receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours."

### BRE Guidance - Open Spaces

- 23.9. The Guidelines state that it is good practice to check the sunlighting of open spaces where it will be required and would normally include: 'gardens to existing buildings (usually the back garden of a house), parks and playing fields and children's playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between non-domestic buildings and in public squares, focal points for views such as a group of monuments or fountains'.
- 23.10. At paragraph 3.3.17 it states: "It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March."

### Daylight/Sunlight Analysis

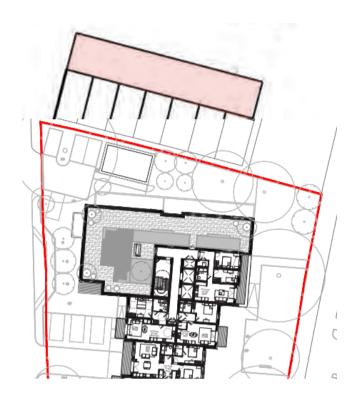
- 23.11. Concerns have been raised during the consultation process from neighbouring properties in respect of the impact of the proposed development on surrounding daylight and sunlight leading to an impact on residential amenity.
- 23.12. A 'Daylight & Sunlight Impacts to Neighbouring Properties' report has been submitted as part of the application and based on proximity to the Proposed Development, assessing Vertical Sky Component method (VSC), Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) and overshadowing and the following properties were identified as relevant for daylight and sunlight assessment:

- 4 16 Moorfield Road
- 253 275\* Hertford Road (\*potential error and shall be noted as 273)
- 233 249\* Hertford Road (\*potential error as No.251 Hertford Road aka 1 Carterhatch, an upper floor residential unit and Nos. 233 – 241 Hertford Road aka 2 Cedar Avenue (Narev Court) have been omitted)
- 43 56 Carterhatch Lane
- 1 43 Moorfield Road

# **Vertical Sky Component**

Nos. 4 - 16 Moorfield Road:

- 23.13. A row of two storey terraced houses located to the north of the development. The Proposed development (north facing elevation) would be located 14m from the rear boundary of No.4 Moorfield Road and 9.5m from the rear boundary of No.16 Moorfield Road.
- 23.14. The Proposed nine storey development (north facing elevation) would be 17.4m from the rear elevation of No.4 Moorfield Road and 22.8m from the rear elevation of No.16 Moorfield Road.
- 23.15. The existing residential windows surveyed to the rear of this row of houses are in excess of 32.42% (VSC), the highest being 36.27% (VSC). As a result of the Proposed Development, all windows would remain above 18% VSC (which might be considered appropriate in an older mews development setting), however a number of windows would result in significant reductions, the highest ratio reduction would be 0.59 (some 41% reduction of its former value), from 33.53% and 33.92% down to 20.69% and 19.92% respectively.
- 23.16. It is considered that this level of reduction, upon the light levels of these modest 2 storey houses is not acceptable.



Nos. 253 - 273 Hertford Road:

- 23.17. A row of buildings between two and three storeys in height, with commercial uses at ground floor level and residential uses above, located to the east of the development. The Proposed development (east facing elevation) would be 27m from the front elevation of No.253 Hertford Road and beyond 50m from the front elevation of No.273 Hertford Road.
- 23.18. The residential windows surveyed are in excess of 36.58% (VSC), the highest being 36.74% (VSC).
- 23.19. As a result of the Proposed Development, all windows would remain above 18% VSC, however a number of windows would result in significant reductions, the highest ratio reduction would be 0.58 (42% reduction of its former value), from 36.71 to 21.19. The percentage reduction in this particular context, across a London street, is so high whilst using the reduced 18% VSC target confirms the unacceptability of the bulk and mass of the scheme at this point.



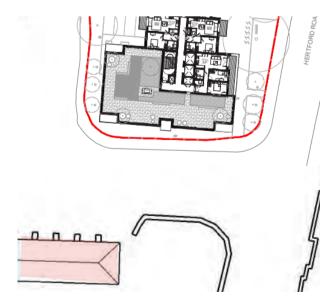
Nos. 233 - 249 Hertford Road:

- 23.20. A row of buildings between one, two and four storeys in height, with commercial uses at ground floor level and residential uses above, except No.241 Hertford Road (Narev Court), a purpose built residential block on the corner with Cedar Avenue, located to the east of the development. The Proposed development (east facing elevation) would be 25m from the front elevation of No.249 Hertford Road and beyond 30m from the front elevation of Nos. 233 241 Hertford Road aka 2 Cedar Avenue (Narev Court).
- 23.21. The residential windows surveyed are in excess of 36.63% (VSC), the highest being 36.95% (VSC). As a result of the Proposed Development, all windows would remain above 18% VSC, however a number of windows would result in significant reductions, the highest ratio reduction would be 0.56 (44% reduction of its former value), from 36.92 and 36.95 to 20.69 and 20.87 respectively.



Nos. 43 - 56 Carterhatch Lane:

- 23.22. A four to five storey purpose built residential block, located to the south of the development. The Proposed development (south facing elevation) would be more than 24m from the front elevation of this block.
- 23.23. The residential windows surveyed are in excess of 26.98% (VSC), the highest being 38.95% (VSC). As a result of the Proposed Development, all windows would remain above 18% VSC. The most significant reductions would be 0.74 (26% reduction of its former value), from 37.51 to 28.62.



Nos. 1 - 43 Moorfield Road

- 23.24. A four to five storey purpose built residential block, located to the west of the development. The Proposed development (west facing elevation) would be more than 20m (closest point) from the front elevation of this block.
- 23.25. The residential windows surveyed are in excess of 23.47 % (VSC), the highest being 38.18% (VSC). As a result of the Proposed Development, 13 of the 140 windows would fail to remain above 18% VSC reaching, 15.31, 12.27, 12.10, 13.45, 14.08, 5.72, 5.92, 5.05, 6.05, 7.88, 14.80, 16.22, 17.52. The most significant reductions would be 0.21 (79% reduction of its former value), from 23.71 to 5.05.



Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH)

23.26. Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) is a measure of sunlight that a given window may expect over a year period unobstructed to the ground. BRE guidance recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in the winter months between 21 September and 21 March. If the available sunlight hours are both less than the amounts above and less than 0.8 times their former value either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building will notice the

loss of sunlight; if the overall annual loss is greater than 4% of APSH, the room may appear colder and less cheerful and pleasant.

Nos. 4 - 16 Moorfield Road:

23.27. The residential windows surveyed to the rear are in excess of 74 (APSH) and 24 (WPSH). As a result of the Proposed Development, all windows would remain above 53 (APSH) and 8 (WPSH), however a number of windows would result in significant reductions, the highest ratio reduction would be 0.67 - 33% reduction of its former value (APSH) and 0.28 – 72% reduction of its former value (WPSH).

# **Conclusion of Daylight & Sunlight**

23.28. The loss of sunlight and daylight is considered to result in significant harm to the living conditions of occupiers of these existing residential properties. It is concluded that the Proposed Development would have a harmful effect on the living conditions of local residents through a harmful loss of sunlight and daylight to the occupiers contrary to the policies outlined above.

#### Overshadowing

- 23.29. In addition to the above daylight and sunlight assessment the applicants also undertook an overshadowing analysis of nearby relevant properties.
- 23.30. BRE guidance recommends that for it to appear adequately sunlit throughout the year, at least half (50%) of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above and the area which can receive 2 hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

### Nos. 1 - 43 Moorfield Road

23.31. The residential gardens surveyed to the front are in excess of 73%, the highest being 96.43%. As a result of the Proposed Development, 5 gardens would fail to remain above 50%, reaching, 40%, 36.67%, 42.31, 40% and 43.33%. The most significant reductions would be 0.45 (55% reduction of its former value), from 76.92% to 42.31%.

#### Nos. 4 - 16 Moorfield Road:

- 23.32. The residential gardens surveyed to the rear are in excess of 73.86%, the highest being 89.48%. As a result of the Proposed Development, 6 out of 7 gardens would fail to remain above 50% with No.4 (49%), No.6(20%), No.8(0%), No.0(0%), No.12(0%), No.14(16.25%), whilst No.16 would comply (81.27% possible error). The most significant reductions would be at Nos 8, 10 and 12 which would see losses of 100% of its former value.
- 23.33. Open areas to the south of Carterhatch Road, west of Moorfield Road and east of Nos. 4 16 Moorfield Road.
- 23.34. The proposal would not result in a significant reduction to these areas of public open spaces.

### Conclusion of Overshadowing

23.35. The increase in overshadowing is considered to result in significant harm to the living conditions of occupiers of these residential properties.

#### Conclusion of Privacy and Overlooking

- 23.36. Objections have been received in respect of privacy impacts. These include objections received from neighbouring properties along Moorfield Road. These objections raise concerns that privacy impacts will be exacerbated by the proximity of the Proposed Development.
- 23.37. London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing. Policy D6d states that the design of development 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.
- 23.38. 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.

23.39. Adopted Enfield Policies DMD 6 and 8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Adopted Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment. Adopted Enfield Policy DMD10 is silent on this type of relationship, but requiring that development not compromise adjoining sites.

Nos. 4 - 16 Moorfield Road:

23.40. The Proposed development (north facing elevation) would be 14m from the rear boundary of No.4 Moorfield Road and 9.5m from the rear boundary of No.16 Moorfield Road. The Proposed development (north facing elevation) would be 17.4m from the rear elevation of No.4 Moorfield Road and 22.8m from the rear elevation of No.16 Moorfield Road. Concern is raised over the fact that the proposed development would rise nine storeys in height (the top two being recessed from the north elevation) and would be 30m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms. From sixth floor level communal and private amenity spaces are sited.

Nos. 253 - 273 Hertford Road:

- 23.41. The Proposed development (east facing elevation) would be 27m from the front elevation of No.253 Hertford Road and beyond 50m from the front elevation of No.273 Hertford Road.
- 23.42. The Proposed development would rise nine storeys in height (the top two being recessed from the north elevation) and would be 57m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing

associated with windows serving primarily habitable rooms, along with private projecting balconies.

Nos. 233 - 249 Hertford Road:

- 23.43. The Proposed development (east facing elevation) would be 25m from the front elevation of No.249 Hertford Road and beyond 30m from the front elevation of Nos. 233 241 Hertford Road aka 2 Cedar Avenue (Narev Court).
- 23.44. The Proposed development would rise nine storeys in height (the top two being recessed from the north elevation) and would be 57m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms, along with private projecting balconies.

Nos. 43 - 56 Carterhatch Lane:

- 23.45. The Proposed development (south facing elevation) would be more than 24m from the front elevation of this block.
- 23.46. The Proposed development would rise nine storeys in height (the top two being recessed from the south elevation) and would be 30m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms, along with private projecting balconies.

Nos. 1 - 43 Moorfield Road

- 23.47. The Proposed development (west facing elevation) would be more than 20m (closest point) from the front elevation of this block.
- 23.48. The Proposed development would rise nine storeys in height (the top two being recessed from the west elevation) and would be 57m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms, along with private projecting balconies.

# Conclusion of Privacy and Overlooking

23.49. The loss of privacy, in particular as would be experienced in the rear amenity spaces of the existing houses at 4 to 16 Moorfield Road is considered to result in significant harm to the living conditions of occupiers of these residential properties as a result of the Proposed Development

#### Outlook

Nos. 4 - 16 Moorfield Road:

23.50. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 4 - 16 Moorfield Road rise 5.7m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

Nos. 253 - 273 Hertford Road:

23.51. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 253 - 273 Hertford Road rise 11.95m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

Nos. 233 - 249 Hertford Road:

23.52. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 233 - 249 Hertford Road rise 12.3m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

Nos. 43 - 56 Carterhatch Lane:

23.53. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 43 - 56 Carterhatch

Lane rise 12m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

#### Conclusion of Outlook

23.54. The loss of outlook is considered to result in significant harm to the living conditions of occupiers of these residential properties. It is concluded that the siting of the Proposed Development in relation to nearby occupiers would have a harmful effect on the living conditions of occupiers of the residents through a harmful loss of outlook to the occupiers. I also consider that the building would result in significant overbearing and a greater sense of enclosure to the occupiers of 4 to 16 Moorfield Road

# Noise and Disturbance

- 23.55. Guidance relevant for the assessment of noise affecting new developments is given in the National Planning Policy Framework (NPPF). Paragraph 185 sets out that that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to a) 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life'.
- 23.56. Meanwhile Policy D14 of the London Plan sets out that in order to reduce, manage and mitigate noise to improve health and quality of life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. Lastly, the London Plan introduces the concept of 'Agent of Change' which places the onus on the new development to ensure adequate noise mitigation measures are in place if their development will be close to a noise generating use.

- 23.57. The proposed residential development is consistent with the existing prevailing residential use in the area and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the residential element of the development.
- 23.58. With regards to noise impact to future occupiers of the Development, the submission documents include an Environmental Noise Assessment which recommends mitigation measures are implemented to address ground borne noise and vibration impact. These measures could include suitable glazing. In order for noise and vibration levels to remain at an acceptable level and in the event that the proposal was acceptable in all other respects a planning condition would have been recommended to secure this in line with relevant policy and guidance as outlined above.
- 23.59. With regards to occupier amenity it is recognised that most developments in urban areas will be subject to noise levels above the BS8233 recommended levels for balconies. However, it is reasonable to assume that future occupiers would prefer the option to have a noisier balcony as opposed to having no balcony at all.
- 23.60. Furthermore, it is acknowledged that there are no other noise mitigation measures available for balconies other than fully enclosing them (i.e. 'winter gardens'), which essentially changes the balconies into internal rooms. On this basis the development is considered acceptable in relation to noise levels in external to private amenity areas.

# Conclusion of Neighbouring Amenity Considerations

- 23.61. Objections have been raised by local residents in respect of loss of light arising from the development. Officers have carefully considered these objections (looking at impacts on the properties listed above) and consider that the impacts would result in unacceptable harm to the living standards of neighbouring properties.
- 23.62. Officers have assessed the impacts in light of NPPF Paragraph 125(c) which states that local planning 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). Taking into account existing levels of light to the properties and the urban context of the site, it is considered that the analysis satisfactorily demonstrates harm significant enough to render the scheme unacceptable.

- 23.63. With regards to potential noise and disturbance arising from the use/occupation of the development it is noted that there is some level of concern from neighbouring occupiers in relation to this, however the proposed new measures, would ensure that noise and vibration levels would remain at an acceptable level, despite the intensification of the use.
- 23.64. For the reasons considered above the proposed development is not considered to be acceptable in terms of amenity impact to neighbouring occupiers contrary to policies DMD 8, 37 & 68 of the development management document, CS Policy 4 of the Core Strategy and London Plan Policies D4, D6 and D14.

# 21. Transportation, parking and highways

- 24.1. London Plan 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.
- 24.2. London Plan Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 24.3. 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.

- 24.4. The site is located on the corner of Carterhatch Lane and Hertford Road, and was previously in use as a medical centre, but this has since closed. Vehicular access is currently and is proposed to remain from Moorfield Road, which is an adopted unclassified road accessed from Carterhatch Lane. Hertford Road and Carterhatch Lane are both classified roads with double yellow lines preventing parking at any time, and there is a zebra crossing to the immediate south of the site on Carterhatch Lane.
- 24.5. The site has a PTAL of 2, which is low. There are double yellow lines along much of Moorfield Road at the London Fire Brigade request, as there was already an issue with parked vehicles blocking access. This has further reduced the available on-street space for any off-site parking or servicing.
- 24.6. This proposal is for 106 residential units (comprising of 42 x 1-bed, 51 x 2-bed and 14 x 3-bed), as well as 10 car parking spaces (3 of which are disabled parking bays) and 192 cycle parking spaces. The 10 car parking spaces would mean that this development would be what we would term as car free.
- 24.7. Given the low PTAL of this site, a car-free development would only be suitable in this location if a Car Parking Zone (CPZ) was implemented, and occupants of the new development are exempted from being eligible for residential permits for that or any future CPZ. In order to establish the CPZ we would require £25,000 towards consultation and implementation of a CPZ. We note that the submitted TA refers to the CPZ, saying that the CPZ would be created and funded by the developer.
- 24.8. Due to the low PTAL there would also be an expectation that significant improvements to the cycling offer to the local community, further our Healthy Streets team stated that there is an ambition to improve the crossing opposite the site on Carterhatch Lane, as well as the cycle lane width on the northern side adjacent to the

development. Since the standard contributions expected from a scheme of this size towards Cycle Enfield would be in the region of £31,775 (based on our contributions calculator) this could take the form of a sliver of land on the Carterhatch Lane / Hertford Road frontages being contributed, and money towards the works required. The submitted documents however refer to the Hertford Road cycle lane works as being fully funded and as result, this needs further discussion as there is no agreement in place regarding contributions towards cycle Enfield and associated infrastructure. Without this and the required CPZ, then a car free development of this nature cannot be supported.

- 24.9. In addition, if the proposed development was acceptable in all other respects the Council would have requested general Sustainable Transport contributions in line with our contributions calculator. This would require a payment of £43,845 towards sustainable transport measures.
- 24.10. We note that the 10 car parking spaces have been designed so that they are accessible via two separate access points, which reduces reliance on Moorfield Road. The Transport Assessment refers to a Car Park Management Plan (CPMP) which considers how additional disabled parking bay (DPB) provision could be achieved in the future if demand increased (the London Plan requires that at the outset DPBs are provided for 3% of dwellings, which the proposed 3 DPBs achieves; however it also requires that the proposal demonstrates how up to 10% of dwellings could be provided with DPBs if required), however this CPMP did not appear to be included within the application documents, so we cannot properly assess how this would be achieved.
- 24.11. The London Plan also states that 20% of parking bays at residential development should include full electric charging capabilities, whilst the remaining bays must all have passive charging capabilities. While it is possible for this to be achieved, it is not confirmed. In the event that the proposed development was acceptable in all other respects 2 of the 10 parking spaces would need to have active EV charging and the remaining 8 to have passive provision. The TA refers to a car club bay being provided on site, and this is generally welcomed. However, it is not clear where this car club bay is located.

#### Cycle parking

24.12. The development requires a total of 192 long stay cycle parking spaces and 4 short stay spaces. There are 2 internal separate dedicated cycle parking stores at ground floor level and 2 short stay parking spaces to the east of the site. In the event that the proposal was acceptable in all other respects a condition would have been attached that requires the proposed cycle storage facilities to accord with the requirements of the London Cycling Design Standards, to ensure adequate dimensions for door and aisle widths.

## Delivery and servicing

- 24.13. With regards to servicing, we are concerned that the development places the burden of this onto Moorfield Road, by creating an on-street servicing layby on the public highway. Again, it is considered that in order to avoid disbenefit to the public, we would require that land to the front of the site on Carterhatch Lane / Hertford Road is passed to the Healthy Streets team to allow for further improvements to the highway and cycle infrastructure around the site.
- 24.14. If an on-street bay is created, it is important to maintain the footway around it, which does appear to encroach into the red line of the site. We would also need the applicants to fund the construction of the bay and the required orders etc for the double yellow line markings that would ensure the bay could only be used for loading and drop off / pick up.
- 24.15. A Delivery and Servicing Plan (DSP) has been submitted in the event that the proposed development was acceptable in all other respects the DSP would have been secured by way of condition. Concern is raised over the statement within the DSP that residential developments do not generate a high intensity of servicing. Given that this is a car free development for 106 residential units we would expect a higher number of delivery movements (online supermarkets, hyper online retailers etc) than we would for traditional car-owning occupants, but this does not appear to have been properly considered.
- 24.16. The DSP demonstrates that the refuse vehicle would reverse into the site from Moorfield Road and this would be within 10 metres of the bin store. Which would be acceptable.

Transport, parking and highways conclusion

24.17. The application site is located outside a controlled parking zone and in the absence of contributions towards the extension of the CPZ officers are unable to support a car free development in this location. For the reasons considered above officers are unable to support this element of the proposed development.

# 22. Waste Storage

- 25.1. London Plan policy SI 7 seeks to promote a more circular economy that improves resource efficiency, recycling and reductions in waste going for disposal. Referable applications should promote circular economy outcomes and aim to be net zerowaste. Core policy 22 of the Core Strategy states that the Council will:
  - encourage on-site reuse and recycled materials,
  - encourage on site reuse and recycling of construction, demolition and excavation waste;
  - require appropriate provision to be made for on site waste treatment, storage and collection throughout the life time of the development.
- 2.1 It is indicated in the plans submitted that the refuse and recycling are will be located at ground floor level. It appears as though adequate storage space for refuse bins would be available. If the proposed development was acceptable in all other respects a condition would have been attached requiring details of refuse storage to be submitted to the Council and approved in writing. The applicant would need to demonstrate that the capacity of the refuse bins to meets the requirements of ENV08/162.
- 25.2. The applicant has submitted a circular economy statement to demonstrate that the proposed development has applied circular economy principles in line with the above London Plan policy. Officers are satisfied with the findings of this report.
- 25.3. Policy DMD 57 requires developers to produce site waste management plans (SWMP) to arrange for the efficient handling of construction, excavation and demolition waste and materials. Moreover, a Green Procurement and construction plan has not been submitted. In the absence of these details officers are unable to ascertain whether the proposed development would be consistent with these policies. If the proposed development was acceptable in all other respects a

condition would have been attached requiring these details to be submitted.

# 23. Flood Risk and Drainage

- 26.1. Policy DMD59 states that new development must avoid and reduce the risk of flooding, and not increase the risk elsewhere. Policy DMD 61 states that a drainage strategy will be required for all development to demonstrate how proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan. The policy requires that a development such as the one proposed must achieve greenfield run off rates and must maximise the use of SuDS by including several treatment phases.
- 26.2. From our surface water flood risk assessment, we interpolate the flood level to be ~20mAOD. This means that the FFLs must be at least 20.10mAOD (not 20.0mAOD). Is this level reflected in the ground floor drawings?
- 26.3. Appendix E of the FRA and Drainage Strategy seems to be missing. We are therefore unable to determine if the proposed SuDS Strategy meets the requirements of DMD Policy 61.

# 26.4. For example:

### 1. Suitability

It is not clear if the London Plan Drainage Hierarchy has been followed; it is not clear why a Type C (no infiltration) system is proposed for the permeable paving, partial infiltration should be allowed to occur. While above ground storage features have been mentioned, below ground storage has also been mentioned, so it is not clear if above ground storage has been maximised; Has source control SuDS measures been utilised for all the hardstanding and roof runoff (see)?

### 2. Quantity

What is the proposed discharge rate; this should be greenfield runoff rate for the 1 in 1 year and 1 in 100 year (plus climate change) events, or Qbar if one discharge rate is utilised; It is not clear if the proposed storage enables greenfield runoff rates to be achieved and how attenuation is achieved

## 3. Quality

Source control SuDS measures must be used extensively for the hardstanding and roof areas. We must ensure that the majority of hardstanding and roof areas (with the target of 100%) are drained via source control SuDS measures. Green roofs, channels and rills, and swales were mentioned in the report, but it is not clear where these are located and what areas they are draining. RWPs must discharge on the surface of source control SuDS feature rather than into the sub-base, as this will cause siltation

## 4. Functionality

Cross sections, sizes and specifications of the proposed SuDS features must be provided. Overland flow routes for exceedance events including spot levels must be submitted. The Management Plan for future maintenance must be submitted

26.5. If the proposed development was acceptable in all other respects a condition would have been attached requiring these details to be submitted.

# 24. Ecology and biodiversity

- 27.1 The London Plan, the Core Strategy, and the DMD seek to protect and enhance biodiversity. Policy DMD 79 states that developments resulting in the creation of 100m² or more, or the creation of one or more net dwellings should provide on-site ecological enhancements and Policy DMD 81 states that development must provide high quality landscaping that enhances the local environment. Most developments can provide ecological enhancements to improve the biodiversity offer on that site. Enhancements could range from anything such as bird boxes to wildlife friendly landscaping or green roofs, but enhancements should be scaled to reflect the size and scale of the proposed development.
- 27.2 Policy DMD 55 requires all major developments to use as much roof space and vertical surfaces as technically and economically feasible for the installation of zero carbon technologies, green roofs, and living walls. Such measures will also contribute to flood risk management. Any proposal should also demonstrate how it conforms to the Drainage Strategy.

- 27.3 We would advise the inclusion of suitable enhancements such as, but not limited to, bird/bat boxes designed into the fabric of the building and in surrounding trees and the planting of appropriate native species.
- 27.4 The Proposed Development will not result in the disturbance of any existing habitats biodiversity gain. When measured against Natural England's Biodiversity Metric 2.0 Calculator, it was found the proposed development would result in a 30.80% biodiversity net gain which exceeds requirements of the forthcoming Bill by some margin.

# 25. <u>Sustainability, design and construction</u>

## Air Quality / Pollution

28.1. The air quality assessment demonstrates that the development type is suitable at this site. In the event that the proposed development was acceptable in all other respects the mitigation measures detailed within the report would have been conditioned.

## Carbon emissions

- 28.2. Policy DMD 49 states all new development must achieve the highest sustainable design and construction standards and include measures capable of mitigating and adapting to climate change to meet future needs having regard to technical feasibility and economic viability. Policy DMD51 states further energy efficiency standards and that all developments will be required to demonstrate how the proposal minimises energy- related CO2 emissions which must adhere to the principles of the energy hierarchy in the policy. This follows policy CP20 of the Core Strategy which states that the Council will require all new developments, and where possible via retrofitting process in existing development to address the causes and impacts of climate change by: minimising energy use; supplying energy efficiently; and using energy generated from renewable sources in line with the London Plan and national policy. The adopted policies require that new developments achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability. A 35% CO2 reduction is required for new residential units.
- 28.3. In light of the above an energy and sustainability statement has been supplied by the applicant. It is indicated in the submitted statement that the proposed development achieves an overall improvement in emissions over the Building Regulations Part L

standards for regulated emissions of minimum of 102.06% and 101.53%. In the event that the proposed development was acceptable in all other respects a condition would have been attached to the decision notice requiring the proposed development to be implemented in accordance with the submitted energy and sustainability statement.

# Water efficiency

28.4. Details of water efficiency measures would also need to be provided to demonstrate water consumption per person per day equal to or less than 105 litres. A condition requiring compliance with these details would have also been attached had the proposed development been acceptable in all other respects.

## Climate Change

28.5. The submitted and whole life carbon assessment demonstrates that the proposed development would be consistent with GLA standards.

# **Health**

- 28.6. The Proposed Development could be expected to result in the provision of housing, additional local spending by residents of the new development, and the provision of private amenity space. 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
- 26. <u>Environmental Considerations</u>
- 29.1 Environmental Health have reviewed the application and have no objections subject to conditions pertaining to noise from plant and piling, Non-Road Mobile Machinery (NRMM), contaminated land and air quality required.
- 29.2 To the application for planning permission as there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality or contaminated land.

The application contains an acoustic report which proposes suitable glazing for the development. The same document also proposes noise limits for plant, as the plant to be installed is not currently known it would be more appropriate to condition the

mechanical plant

# 27. Education

30.1 The scheme will be liable for education and childcare contributions for the net increase of units on site, in accordance with the adopted s106 SPD. In the event that the proposed development was acceptable in all other respects these contributions would have been secured via an s106 legal agreement.

# 28. Fire Safety

- 31.1. In accordance with Policy D12 'Fire safety' of the Mayor's London Plan, the applicant has submitted an outline fire statement, produced by a third party suitable qualified assessor. Information is provided on means of escape, features to reduce risk to life such as sprinklers and access for fire service personnel.
- 31.2. The building is served via two stairs that are non-accessible to each other on the upper floors. The upper floors consist solely of apartments and two rooftop terraces, one accessed via each stair, on the Seventh Floor. There are also apartments on Ground Floor along with non-residential areas (Bin Store, Cycle Store, Plant Areas) as well as an Entrance Lobby. The design of Moorfield Road residential development, with regard to fire safety, has been developed to ensure full compliance with both current Building Regulations and the Approved Documents and/or supporting British Standards (guidance).
- 31.3. The recent amendments to the Building Regulations restricting the use of combustible materials in residential buildings have been considered in this design, therefore all materials used in the construction of the external walls of both blocks will be of European Class A2-s1, d0 or better, other than permitted exceptions. Cavity barriers will be provided around all openings, and at the junction of every fire-resisting wall and floor with an external wall.
- 31.4. All apartments are to be provided with detection throughout all rooms in addition to the sprinkler protection required as part of the building exceeding 11m in height to the topmost habitable storey. The design of the system will be in full accordance with British Standards and will extend to all areas on the Ground Floor.

- 31.5. The scheme is provided with two firefighting stairs which are contained within 120-minute fire rated construction of the firefighting shafts. Ventilation will be provided in the stair lobbies/corridors to prevent smoke spread to enable safe escape and access by the fire service. The Community/Commercial Space is full separated from the residential areas via fire rated construction and will be treated as separate entities.
- 31.6. Fire Service access for the building is via a firefighting stair that serves every floor, both shafts are accessed via protected corridors from the external. Dry risers will be required in each firefighting stair and also serve every storey.

# 29. Security

32.1. The Metropolitan Police have reviewed the development and have raised concerns. The DOC officers were unable to support the development as it been presented as they had serious concerns that the design will contribute to and may increase the opportunity for crime and Anti-Social Behaviour at this location, putting the new and existing residents at risk. In order to manage this potential for increased crime and anti-social behaviour a prior to occupation condition was suggested that requires Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police. In the event that the proposed development was acceptable in all other respects a condition would have been attached requiring these details to be submitted.

# 30. Equality Duty and Human Rights

18.1. Section 149 of the Equalities Act 2010 places obligations on local authorities with regard to equalities in decision making. It is considered that this application does not raise any equality implications or conflict with development plan policies in this regard.

# 31. Community Infrastructure Levy (CIL)

CIL

33.1. As of the April 2010, legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to

apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development.

Mayoral CIL

33.2. The Mayor of London charges CIL in Enfield at the rate of £60 per sqm.

Enfield CIL

- 33.3. As of 1st April 2016 Enfield, has been charging CIL at the rate of £60 per sqm lower Rate Cil Zone).
- 33.4. In this instance the development would be *Mayoral and Enfield* CIL liable but as all the units proposed are social housing it would benefit from relief and no CIL would be payable.

#### 32. Conclusion

34.1. Presumption in Favour of Sustainable Development

In the three years up to and including 2020 the London Borough of Enfield delivered 56% of its 2,328 homes target. This means that Enfield has failed to meet the Housing Delivery Test set out in the National Planning Policy Framework 2021, as set by central government. Per paragraph 11(d) of the NPPF, the relevant development plan policies should, therefore, be considered out of date and planning permission should be granted unless:

- the application of policies in [the NPPF] that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.
- 34.2. This assessment has been made first against the development plan polices and then against the NPPF, in line with s.70(2) of the Town and Country planning Act 1990 (as amended) and s.38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which require that applications for planning permission are made in accordance with the provisions of the development plan unless material

considerations indicate otherwise. The NPPF is a material consideration, not a part of the statutory development plan. As there are policies in the development plan that would otherwise not be out of date were it not for the borough's failure to meet the Housing Delivery Test, any assessment of this type of application requires some assessment of the proposal against these development plan policies prior to the application of the presumption in favour of sustainable development.

- 34.3. The above assessment against the development plan policies has produced the following conclusion:
  - The proposed development would result in unacceptable harm to the residential amenity of neighbouring occupiers
  - The proposed development would result in the creation of a poor standard of accommodation for some future occupiers.
  - In the absence of contributions to the extension of controlling measures to the proposal would result in congestion on surrounding streets.
  - Sustainable transport
  - The proposed development would negatively impact the preserved trees and result in the unacceptable loss of B category trees harming the verdant appearance of the locality
- 32.1. For the reasons considered above the while the Council acknowledge the merits of the proposal these have been assessed against the policies of the development plan and other material planning considerations. Officers consider that on balance the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.



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5 - White/light soldier course brickwork with white/light mortar
6 - White/Light GRC frame

10 - Powder coated aluminium windows - dark grey/black
11 - Powder coated metal balustrade - dark grey/black
12 - Dark grey/black louvred doors

7 - White/Light GRC canopy at ground floor8 - White/Light Solider course window header9 - White/Light GRC coping

13 - Dark grey/black metal panel 14 - Back-painted glass

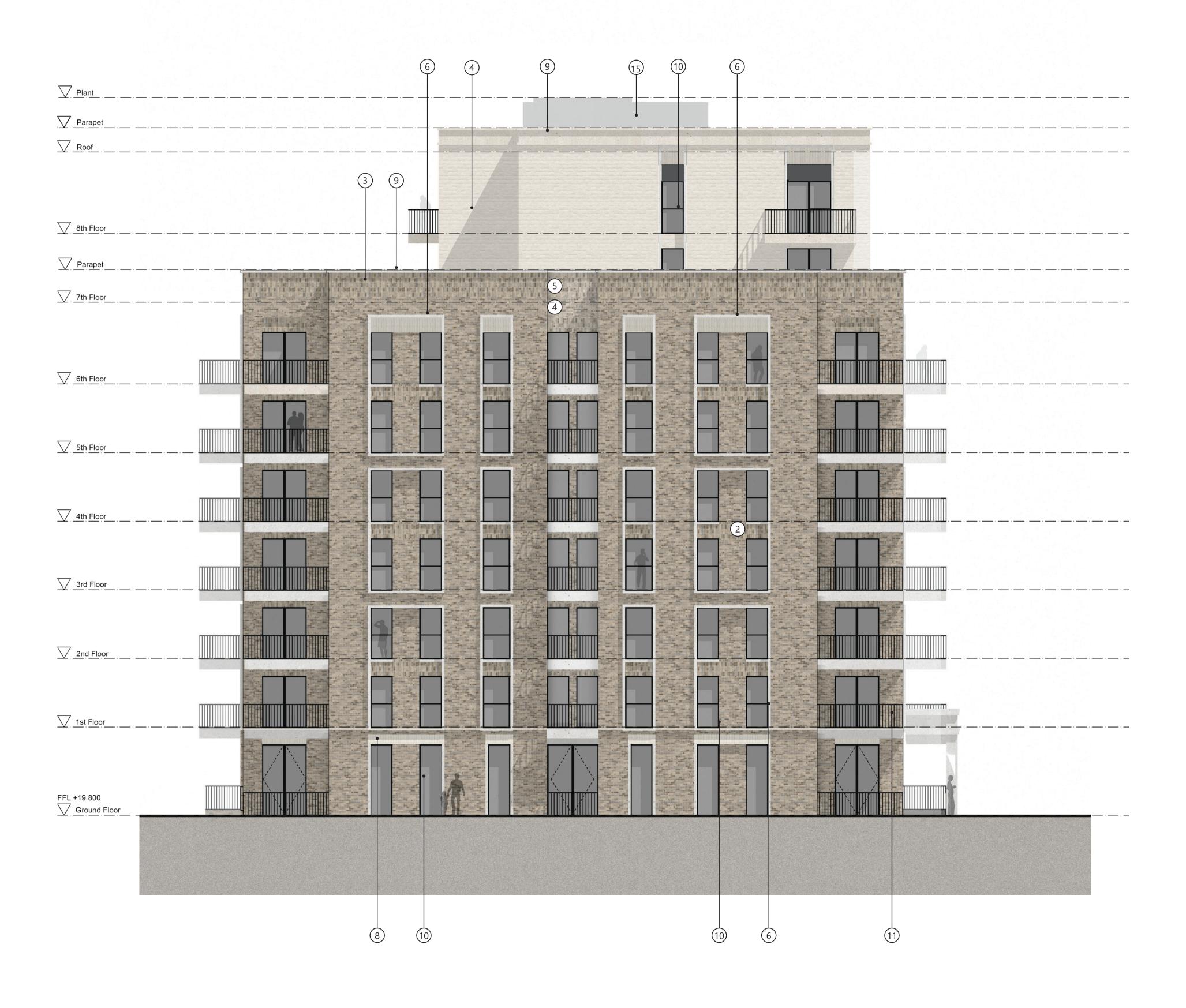
15 - Plant

East Elevation (AA) SOCIAL CAPITAL PARTNERS client / project MOORFIELD ROAD

AE250 Po1 drawing number SHP-MRE STM 1:100 scale @ A1

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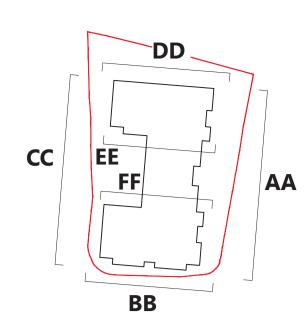
South drawing title	South Elevation (BB)	
client / project	SOCIAL CAPITAL PARTNERS MOORFIELD ROAD	

AE251 Po1 drawing number 1:100 scale @ A1 SHP-MRE STM

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13 - Dark grey/black metal panel 14 - Back-painted glass

15 - Plant

West Elevation (CC)	AE252	
SOCIAL CAPITAL PARTNERS MOORFIELD ROAD	1:100 scale @ A1	

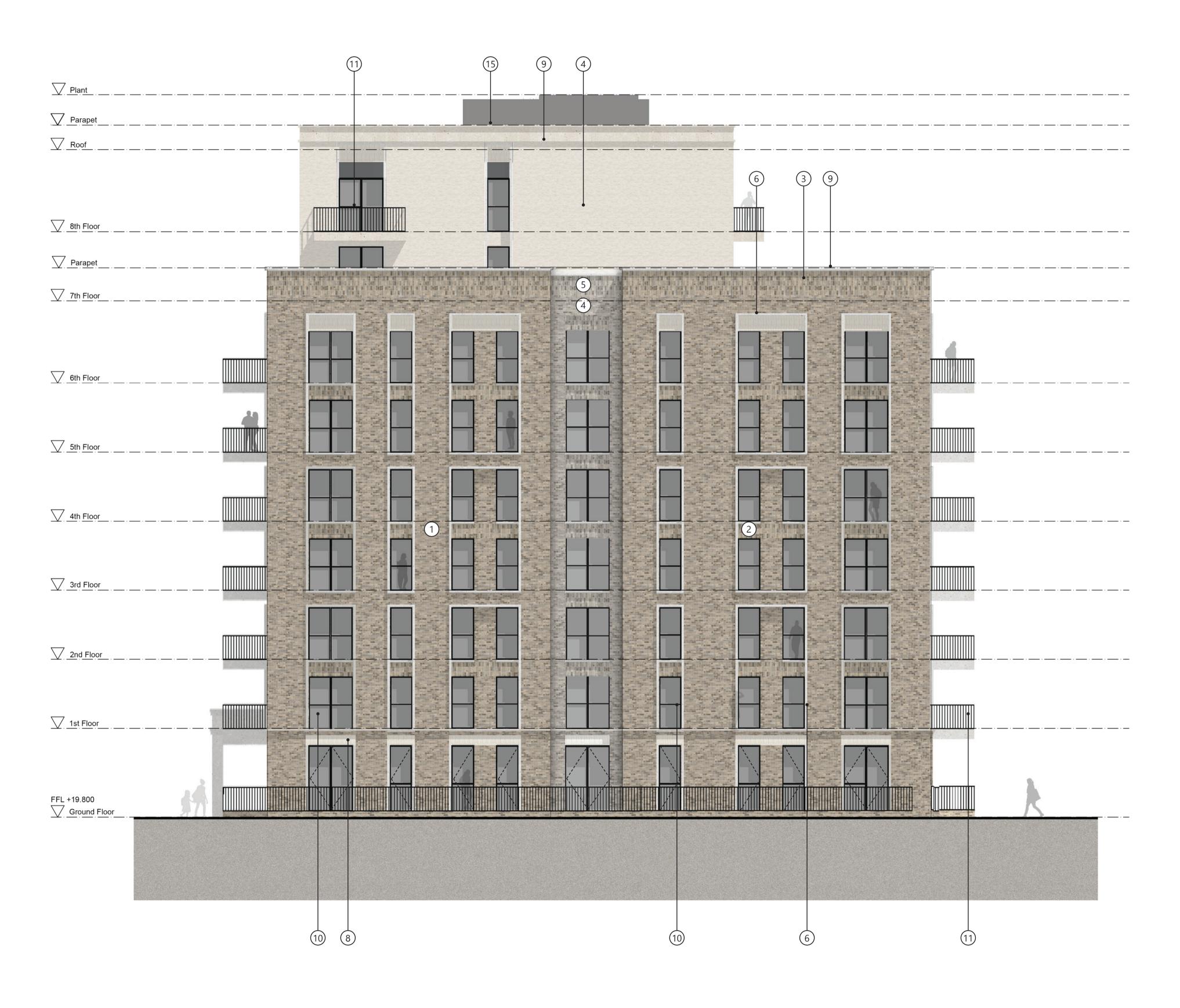
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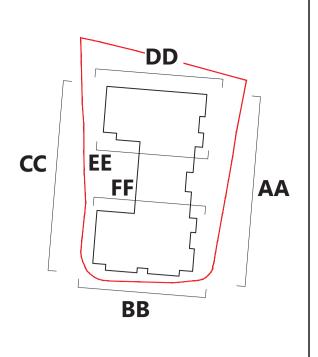
13 - Dark grey/black metal panel 14 - Back-painted glass 15 - Plant

North	Elevation (DD)	AE253	F	01
drawing title		drawing number		
client / project	SOCIAL CAPITAL PARTNERS MOORFIELD ROAD	1:100 scale @ A1	SHP-MRE project number	STM originated

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Courtyard South Elevation(EE) AE254
drawing title drawing number SOCIAL CAPITAL PARTNERS MOORFIELD ROAD 1:100 scale @ A1 SHP-MRE STM

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Courtyard North Elevation(FF) AE255
drawing title drawing number SOCIAL CAPITAL PARTNERS MOORFIELD ROAD 1:100 scale @ A1

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Proposed Long Elevations drawing title East & South	
SOCIAL CAPITAL PARTNERS  client / project MOORFIELD ROAD	1

AE256 Po1 drawing number 1:200 scale @ A1 SHP-MRE project number

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Proposed Long Elevations
drawing title West + North

SOCIAL CAPITAL PARTNERS
MOORFIELD ROAD

AE257
drawing number

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1:200
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PO1
SHP-MRE LSM originate project number

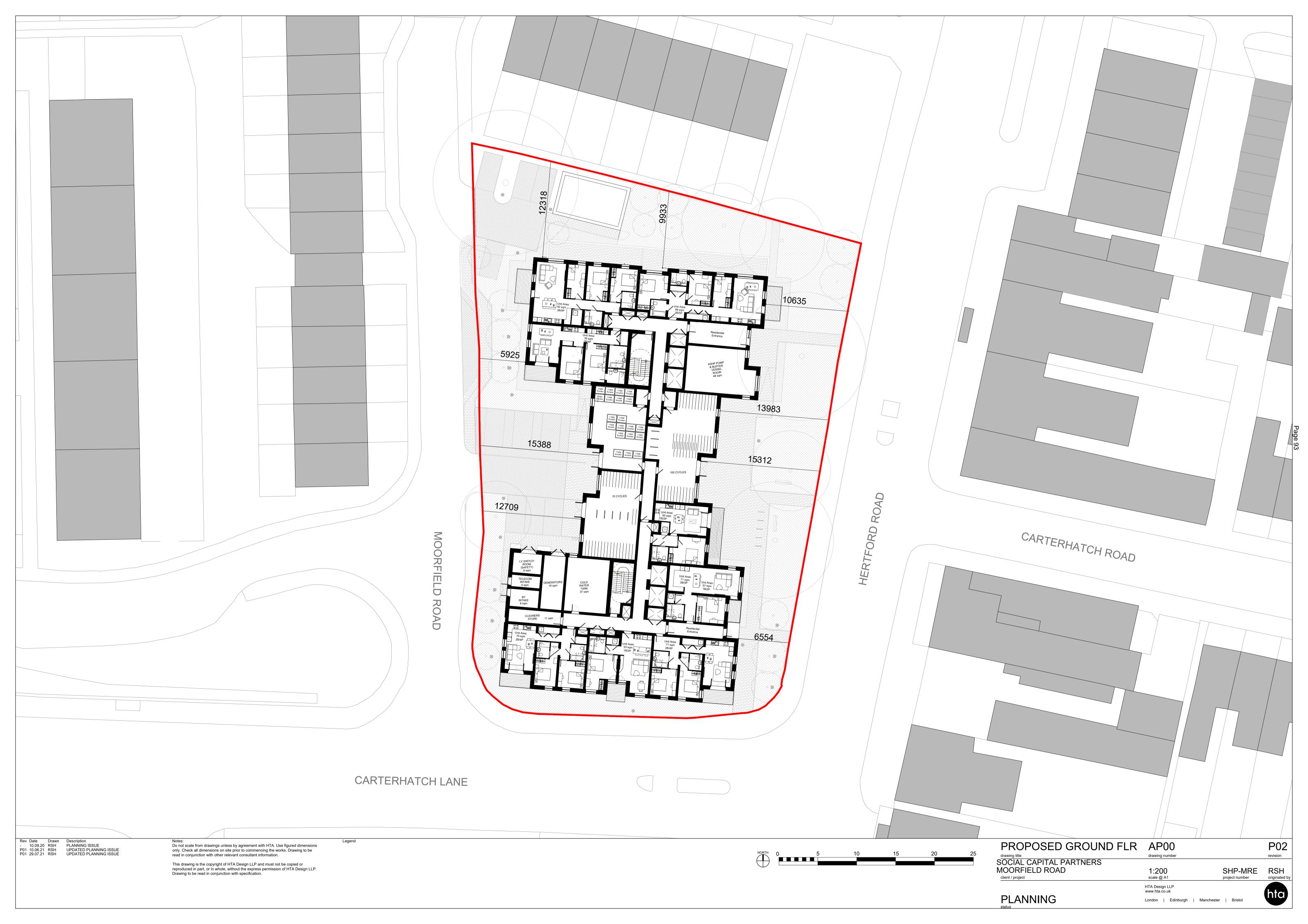
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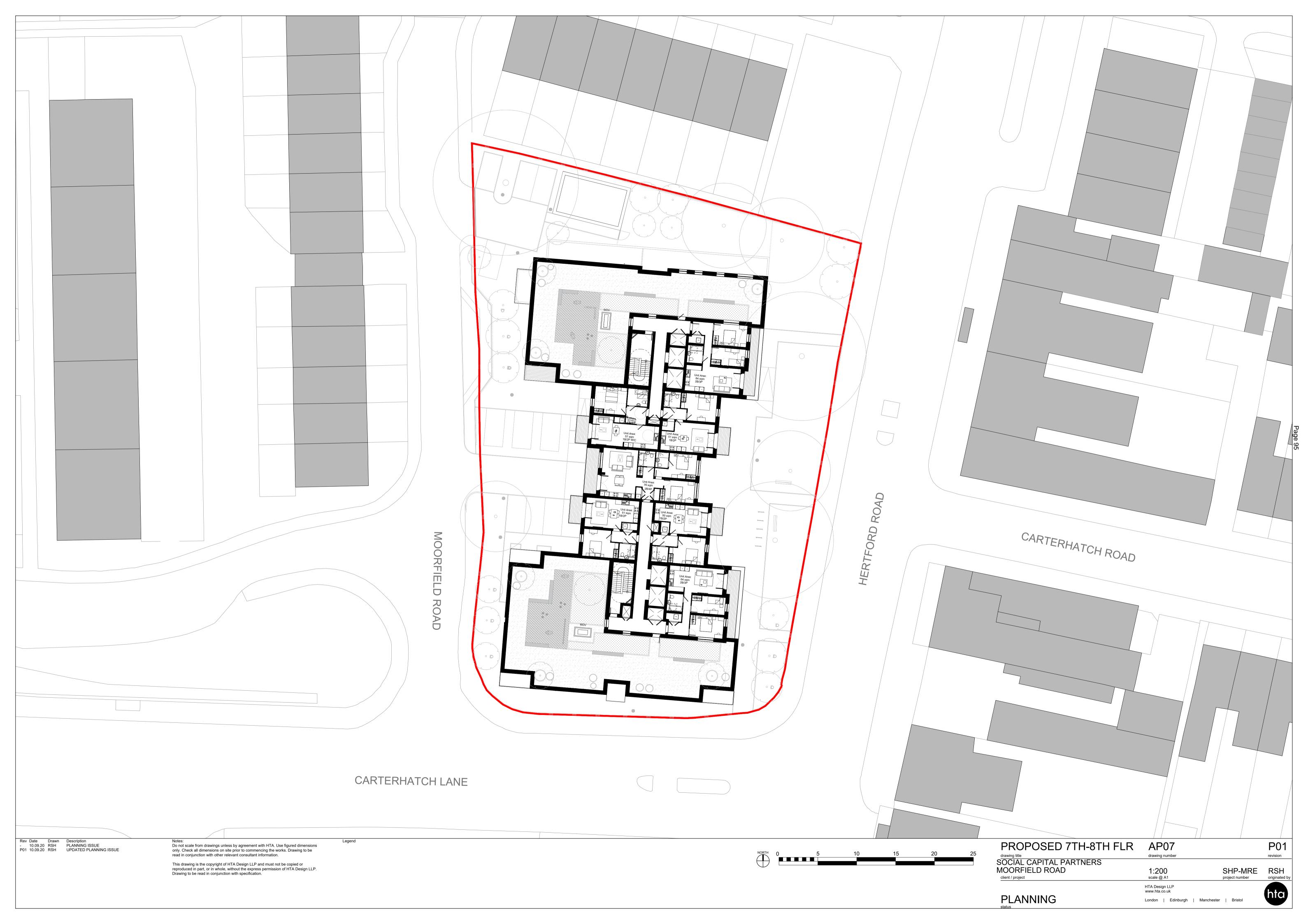
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LONDON BOROUGH OF ENFIELD				
PLANNING COMMITTEE			Date: 22 March 202	22
Report of: Head of Planning - Vincent Lacovara	Contact Officer: Eloise Kiernan Gideon Whittinghal Andy Higham	n		<b>Ward:</b> Bush Hill Park
Application Number: 21/03370/FUL			Category: Minor Dwellings	
LOCATION: Bush Hill Park Bowls Tennis and Social Club, Abbey Road, Enfield, EN1 2QP				
<b>PROPOSAL:</b> Redevelopment of site involving removal of 2 disused tennis courts and subdivision of site to provide 4 x single family dwellings together with refuse and bicycle storage.				
Mr Davidian 2DD Bush Hill Park Bowls Tennis And Social Club Abbey Road  Mr M MSK 230 H Barne		Agent Name & Address:  In Michael Koutra  ISK Design Ltd  30 High Street  Farnet  EN5 5TD		
RECOMMENDATION:  That the Head of Development Management be authorised to GRANT planning permission subject to conditions.				

#### 1. Note to Members

1.1 The application is being considered by committee as the previous application ref. 20/01895/FUL was refused by Planning Committee on 3 August 2021. Additionally, the proposal has been called in by Councillor De Silva.

# 2. Executive Summary

- 2.1 The report seeks approval to a scheme involving the subdivision of the application site to provide x4 residential units of accommodation. The proposal would result in the loss of two of the existing tennis courts currently on site. In addition the proposal also seeks to provide associated amenity space, cycle parking, landscaping and refuse storage.
- 2.2 The reasons for recommending approval are:
  - The proposed development would be consistent with the objectives of national, regional and local planning policy in terms of supporting and securing sustainable growth and delivery of new housing stock within the borough;
  - ii) The development would provide make efficient use of a small site in delivering additional family housing
  - iii) The proposal has on balance provided justification for the loss of the existing tennis courts that are proposed to be developed on.
  - iv) The development would not harm the character and appearance of the Bush Hill Park Conservation Area
  - v) The proposal offers a policy compliant standard of accommodation for future occupants
  - vi) The development would not result in any harmful impacts upon neighbouring amenity
  - vii) The proposal would not give rise to any significantly harmful transportation impacts in the locality

### 3.0 Recommendation

- 3.1 That, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions:
  - 1. Time Limited Permission
  - 2. Development to be carried out in accordance with approved plans and documents.
  - 3. Construction Management Plan
  - 4. Details of Materials Brickwork, Windows and Doors and all other external materials

- 5. All new brickwork shall be constructed in Flemish bond with queen closers and permanently maintained as such
- 6. All new tiles shall be clay plain tiles and thereafter permanently maintained as such
- 7. All external joinery, windows and doors shall be of painted timber and thereafter so maintained
- 8. Additional drawings that show details of proposed new windows, doors, brick detailing and external joinery, by section and elevation at a scales of 1:20, 1:10, 1:5 and 1:1
- At the time of works, the new casement windows shall be in painted timber, flush meeting within the frames, with matching joinery for opening and fixed casements, and without trickle vents or surface mounted glazing bars
- 10. No electricity, internet, gas or water meter boxes shall be fixed to the external fabric of the building.
- 11. All service intakes including but not limited to electrical, telephone, internet to dwellings, apart from gas, shall be run internally and not visible on the exterior.
- 12. Details of soft landscaping
- 13. Energy Performance Certificate to be submitted
- 14. Full Details of Waste and Recycling Storage
- 15. Full Details of Cycle Parking
- 16. Details of Ecological Enhancements
- 17. Details of Suds Strategy
- 18. Details of Potable Water
- 19. Non Mobile Road Machinery
- 20. Stage 1 Written Scheme of Archaeological Investigation
- 21. Boundary Treatments
- 22. External Lighting
- 23. Details of Surfacing Materials
- 24. Details of amenity space
- 25. Obscure glaze and tope level opening only for side windows

# 4. Site and Surroundings

4.1 The site, measuring 0.108ha, is located between 23 and 35 Abbey Road, and currently contains a pair of disused tennis courts and backs onto additional tennis courts (see Para 9.9) and the Bush Hill Park Bowls and Tennis Club. A

- wire fence separates the tennis courts and street, with access via a lockable gate.
- 4.2 The site is enclosed by a two-storey rear wall on the boundary of the east elevation, a part single, part two-storey flank wall and single storey boundary wall on the north elevation and a single storey boundary wall on the west elevation. The site shares a party wall with the adjoining property, 5 Parker Street, on the southern elevation. The southern elevation also has a two-storey flank wall which extends past the rear building line of 5 Parker Street.
- 4.3 The street is predominantly made up of detached and semi-detached dwellings of various historical styles including Tudor or mock-Tudor, Arts & Crafts, Edwardian, Victorian and post-war housing. At the junction with Longleat Road there are more recent additions including Azalea Court Care Home and a three-storey block of flats.
- 4.4 The application site is located within the Bush Hill Park Conservation Area, the character appraisal for the area identifies the site as open space, adjacent dwellings either side are recognised as making a positive contribution to the conservation area.
- 4.5 The application site is designated as an archaeological priority area and also as local open space.

# 5. Proposal

- 5.1 The proposal is for the sub-division of the application site to remove two disused tennis courts and provide two buildings consisting of 4 residential units. The key aspects are as follows:
  - Removal of existing tennis courts.
  - Construction of two pairs of semi-detached dwellings to provide 4 x 4b7p units
  - Associated soft landscaping and amenity space.
  - Provision of cycle parking spaces and waste storage.
- 5.2 The proposal is not seeking any works to the remainder of the adjacent site comprising the Bush Hill Park Tennis and Social Club and would continue to run in a similar fashion as to its existing services that the club provides.
- 5.3 The proposal was previously submitted as two blocks comprising of 8 flatted units. The proposal also sought to provide off street parking and the building was positioned forward of the front building line of adjacent dwellings. The proposal has been revised as follows:
  - Re-positioning of the front building line to be in line with adjacent properties.
  - Creation of single family dwellinghouses comprising 4 x 4b7p

### 6. Relevant Planning History

6.1 20/01895/FUL - Redevelopment of the site including removal of existing tennis courts, sub-division of site and erection of two new buildings comprising of 4 self-contained flats in each building, together with parking,

- refuse storage and associated works refused by Planning Committee for the following reasons and currently under consideration at appeal:
- 1. The proposed development, due to the loss of sports pitches without clarity on the purpose for which funds would be obtained to support the improvements to all remaining eight pitches on the site would fail to provide a good quality supply of sports and recreational facilities and fail to facilitate health, wellbeing and social cohesion. This would fail to accord with the National Planning Policy Framework (2021), Policy S5 of the London Plan (2021), Policy CP34 of the Core Strategy (2010), Policy DMD74 of the Development Management Document (2014) and the Enfield Playing Pitch Strategy (April 2018 March 2023).
- 2. The proposed development, by virtue of its scale and massing through the provision of accommodation over three floors would result in a scale and form of development that is incongruous and detrimental to the character and appearance of the Bush Hill Park Conservation Area. This would be contrary to the National Planning Policy Framework (2021), Policies D4 and HC1 of the London Plan (2021), Policy CP30 of the Core Strategy (2010), Policies DMD37 and DMD44 of the Development Management Document (2014) and the Bush Hill Park Conservation Area Character Appraisal (2015).
- 6.2 **17/04595/CND** Details submitted pursuant to Ref:15/04629/FUL comprising materials (2 A, B, C), in respect of single storey extension to provide entrance, access ramp and canopy involving demolition of existing entrance porch Refused
- 6.3 **17/05438/CND** Details submitted pursuant to planning application ref: 15/04629/FUL comprising of materials (2) in respect of single storey extension to provide entrance, access ramp and canopy involving demolition of existing entrance porch— Granted
- 6.4 **16/00276/TCA** Works to Oak Tree in Bush Hill Park Conservation Area. Crown reduction by one quarter— Granted
- 6.5 **15/04629/FUL** Single storey extension to provide entrance, access ramp and canopy involving demolition of existing entrance porch.— Granted with conditions

# 7. Consultation

### Public Response:

- 7.1 Consultation letters were sent to 70 neighbouring properties and a press advert was placed in the local newspaper. Site notices were also placed near the application site. A total of 25 comments in objection was received which raised the following matters:
  - Inadequate parking provision
  - Increase in traffic in an already saturated area
  - Strain on existing community facilities
  - The proposed 5m gap between houses would look odd in the street scene
  - Affect local ecology

- Close to adjoining properties
- Conflict with Local Plan
- Development too high
- Increase of pollution
- Information missing from plans
- Not enough information given on application
- Loss of light
- Loss of parking
- Loss of privacy
- · Out of keeping with character of area
- Over development
- Major access road created to the club from Abbey Road. This is unnecessary and is it for future development?
- Increased danger of flooding
- More open space needed on site
- Inadequate amenity space
- The proposals will dominate no's 23 and 35 blocking light and overlooking the properties and gardens having a depth so much greater than the existing houses.
- There is no off-street parking proposed for the new development and the on-street parking is usually at full capacity during the restricted hours between 13:00 and 14:00. The parking survey was carried out in the middle of the night, during Covid, when no visitors were allowed. This is grossly misleading
- The introduction of such a wide 'Access Road' to Bush Hill Park Bowls and Tennis Club - this only needs to be wide enough for a small piece of equipment to maintain the tennis courts. It is now 5m, previously 3 metres.
- Gross over-development of the site which, in our opinion, is suitable for 2 pairs of smaller semi-detached houses with a similar footprint to the neighbouring houses with off-street parking/garages
- The size of the footprint of the development as currently the tennis courts are shale which is a porous surface, these houses would obviously have a negative impact on the environment. The garden areas proposed for these properties is far too small for such large houses and are not shown to be grassed, this means they could be either paved or surfaced with artificial grass, neither of which are environmentally friendly
- Whilst the latest idea to build four, single dwelling, family houses, is better than eight flats, the mass and dimensions of the two blocks of dwellings are exactly the same as the plans which were overwhelmingly rejected by Enfield Planning Committee members in August
- The proposed spacing does not conform with the spacing and rhythm along Abbey Road. The central gap between the two blocks of semi-detached houses measures 5.3m, more than double the spacing allowed between the new houses and adjoining properties at 23 and 35 Abbey Rd. The gap between the new buildings and the perimeter fence of the two neighbouring properties is just 1m. The total width of the gap between the new buildings and both of the adjacent properties is just over 2 metres
- Scale, massing and space does not relate to the Conservation Area and fails to address previous reason for refusal

- The rear wall extends an additional 25% beyond the existing rear building walls at Abbey Road. This should be amended to realign with no. 23 and 35 Abbey Road.
- The proposed development, due to the loss of sports pitches without clarity on the purpose for which funds would be obtained to support the improvements to all remaining eight pitches on the site would fail to provide a good quality supply of sports and recreational facilities and fail to facilitate health, wellbeing and social cohesion

Additionally, one letter of support was received.

Objection received from Cllr Clare De Silva – Whilst keen to see the tennis and bowls club thrive, and supportive of developing the courts in principle, there are concerns about the current proposals. There are still issues with the proposals which need to be addressed before planning permission is granted. The overall footprint of the buildings is still far too large for the area, particularly at the rear where nearby properties would be affected by potential loss of light. There are also still significant questions around the look and feel of the houses at the front in terms of how they would fit with the heritage of the conservation area. There is still insufficient parking allocated on the plans for these kind of family homes. Whilst there is support for a smaller development of semi-detached houses, this specific proposal does not seem to have taken forward many of the planning committee comments and concerns from the previous application.

# **External Consultees:**

# 7.3 Sport England:

Concerned that the development would result in the loss of two tennis courts, especially since the Council's Playing Pitch Strategy (PPS) seeks for these courts to be improved/resurfaced, however it does understand that the funds from the sale would be used to improve the other facilities at the site, as indicated by the Lawn Tennis Association (LTA). These improvements appear to align with some recommendations of the PPS. It is also noted that the LTA do not object to the loss of the tennis courts. In light of this, Sport England considers that the loss of the tennis courts would not meet Sport England's 'Protect' planning objective however the reinvestment of the funds to improve the rest of the site aligns with the spirit of Sport England's 'Enhance' planning objective, this is on the basis that any potential adverse noise implications are mitigated.

# 7.4 Historic England (GLAAS):

Requested a desktop archaeological assessment, following submission of this no objection was raised subject to a condition for a written scheme of investigation prior to the commencement of works.

#### Internal Consultees:

- 7.5 *Transportation:* No objections subject to conditions
- 7.6 Environmental Health: No objections advised that dust emissions will need to be controlled through a condition for a construction management plan in accordance with The London Plan 'The Control of Dust and Emissions

During Construction and Demolition' SPG.

Advised that although there is a tennis club behind it is not considered that playing tennis is a hugely noisy activity and will not negatively impact on the amenity of the residential properties internally.

- 7.8 Heritage Officer: No objection subject to conditions for material samples, brick bond used to be Flemish, tiles used to be clay, all external fenestrations to be painted timber, details of landscaping, boundary treatments and external lighting to be submitted prior to above ground works. Also advised conditions needed to prevent external meter boxes and servicing intakes to be run internally to preserve and enhance the character and appearance of the Bush Hill Park Conservation Area.
- 7.9 Planning Policy: Following submission of evidence to demonstrate need to release tennis courts for development, advised that on balance this was acceptable, and no objection was raised.

#### 8. Relevant Policies

# 8.1 <u>London Plan (2021)</u>

Policy GG1 – Building Strong and Inclusive Communities

Policy GG2 - Making the Best Use of Land

Policy GG3 – Creating a Healthy City

Policy GG4 – Delivering the Homes Londoners Need

Policy H1 – Increasing Housing Supply

Policy H2 – Small Sites

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

Policy D2 – Infrastructure Requirements for Sustainable Densities

Policy D4 – Delivering Good Design

Policy D5 – Inclusive Design

Policy D6 – Housing Quality and Standards

Policy D8 – Public Realm

Policy D11 – Safety, Security and Resilience to Emergency

Policy D12 – Fire Safety

Policy D14 - Noise

Policy HC1 – Heritage Conservation and Growth

Policy S5 – Sports and Recreation Facilities

Policy G4 - Open Space

Policy G5 - Urban Greening

Policy G6 – Biodiversity and Access to Nature

Policy SI1 – Improving Air Quality

Policy SI2 - Minimising Greenhouse Emissions

Policy SI4 – Managing Heat Risk

Policy SI12 – Flood Risk Management

Policy SI13 – Sustainable Drainage

Policy T1 – Strategic Approach to Transport

Policy T4 – Assessing and Mitigating Transport Impacts

Policy T5 – Cycling

Policy T6 – Car Parking

Policy T7 – Deliveries, Servicing and Construction

# 8.2 <u>Core Strategy (2010)</u>

CP2	Housing Supply and Locations for New Homes
CP3	Affordable Housing
CP4	Housing Quality
CP5	Housing Types
CP9	Supporting community cohesion
CP11	Recreation, Leisure, Culture and Arts
CP21	Delivering Sustainable Water Supply, Drainage And Sewerage Infrastructure
CP22	Delivering Sustainable Waste Management
CP24	The Road Network
CP25	Pedestrians And Cyclists
CP28	Managing Flood Risk Through Development
CP30	Maintaining and improving the quality of the built and open environment
CP31	Built Landscape and Heritage
CP32	Pollution
CP34	Parks, Playing Fields and Other Open Spaces
CP36	Biodiversity

# 8.3 <u>Development Management Document (2014)</u>

DMD3

DMD6	Residential Character
DMD8	General Standards for New Residential Development
DMD9	Amenity Space
DMD10	Distancing
DMD 37	Achieving high quality and design-led development
DMD44	Conserving and Enhancing Heritage Assets
DMD 45	Parking standards and layout
DMD 46	Vehicle crossovers and dropped kerbs
DMD 47	Access, new roads and servicing
DMD 48	Transport assessments
DMD 57	Responsible sourcing of materials, waste minimisation and
	green procurement
DMD 58	Water efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD 65	Air quality
DMD 66	Land contamination and instability
DMD 68	Noise
DMD70	Water Quality
DMD71	Open Space
DMD74	Playing Pitches
DMD81	Landscaping

Providing a Mix of Different Sized Homes

# 8.4 <u>Enfield Draft New Local Plan</u>

- 8.4.1 Enfield Local Plan Reg 18 Preferred Approach was approved for consultation on 9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. It is Enfield's Emerging Local Plan.
- 8.4.2 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should

continue to be determined in accordance with the Local Plan. Little weight shall be afforded to the Draft Enfield Local plan (Reg 18), while noting that account needs to be taken of emerging policies and draft site proposals in accordance with paragraph 48 of the NPPF.

- 8.4.3 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.
- 8.5 Other relevant policy and guidance
  - National Planning Policy Framework (NPPF) 2021
  - National Planning Practice Guidance (NPPG) 2019
  - Enfield Characterisation Study
  - Refuse and Recycle Storage Guide Enfield (ENV 08/162)
  - London Plan The Control of Dust and Emissions During Construction and Demolition SPG
  - Bush Hill Park Conservation Area Character Appraisal
  - Bush Hill Park Conservation Area Management Proposals
  - Enfield Climate Action Plan (2020)
  - Enfield Intermediate Housing Policy (2020)
  - (2012) GLA: Shaping Neighbourhoods: Character and Context SPG
  - (2014) GLA: London Sustainable Design and Construction SPG (2014)
  - GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
  - GLA: Housing SPG (2016)
  - Healthy Streets for London (2017)
  - Manual for Streets 1 & 2, Inclusive Mobility (2005)
  - National Design Guide (2019)
  - Enfield Playing Pitch Strategy (April 2018 March 2023)

### Other Material Considerations

Housing Delivery Test and Presumption in Favour of Sustainable Development

- 8.6.1 The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means: "( c) approving development proposals that accord with an up-to date development plan without delay; or
  - (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:
  - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (7); or (ii)any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.6.2 Footnote (8) referenced here advises "This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites ( with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery

- Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years."
- 8.6.3 The Council's recent housing delivery has been below our increasing housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and placed in the "presumption in favour of sustainable development category" by the Government through its Housing Delivery Test. This continuation of this designation was recently confirmed in January 2022
- 8.6.4 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.6.5 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of "presumption in favour of sustainable development.
- 8.6.6 In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 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 while in 2021 we delivered 67%. As a result, we remain in the "presumption in favour of sustainable development" category.
- 8.6.7 This is referred to as the "tilted balance" and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) in accordance with Para 11 (d) of the NPPF. 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 Assessment

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

- 4. Unit Mix:
- 5. Quality of Accommodation
- 6. Transport
- 7. Refuse, Waste and Recycling;
- 8. SuDS;
- 9. Archaeology and;
- 10. Community Infrastructure Levy.

## Principle of Development

## Loss of Existing Tennis Courts

9.2 The proposal would result in the loss of two existing tennis courts currently used by the Bush Hill Park Tennis and Social Club to accommodate the proposed sub-division and development of the application site to provide 8 residential units of accommodation. Planning Committee refused the previous application ref. 20/01895/FUL for the following reason:

The proposed development, due to the loss of sports pitches without clarity on the purpose for which funds would be obtained to support the improvements to all remaining eight pitches on the site would fail to provide a good quality supply of sports and recreational facilities and fail to facilitate health, wellbeing and social cohesion. This would fail to accord with the National Planning Policy Framework (2021), Policy S5 of the London Plan (2021), Policy CP34 of the Core Strategy (2010), Policy DMD74 of the Development Management Document (2014) and the Enfield Playing Pitch Strategy (April 2018 - March 2023).

- 9.3 With regard to the loss of sporting infrastructure Policy S5 of the London Plan provides guidance and advises when sport facilities are lost and states:
- 9.4 Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:
  - 1) an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or 2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - 3) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 9.5 In addition policy CP11 of the Council's Core Strategy advises in relation to the loss of leisure facilities that the Council resists 'The loss of existing recreation, leisure, heritage, culture and arts facilities, unless it can be demonstrated that they are no longer required or will be provided elsewhere'. Additionally, policy DMD71 (Open Space) is considered to be of relevance given that the application site is designated as local open space and advises of the following.
- 9.6 'Development involving the loss of other open space will be resisted unless:

- a. Replacement open space can be re-provided in the same locality and of better quality to support the delivery of the Council's adopted Parks and Open Spaces Strategy; or
- b. It has been demonstrated through the submission of an assessment that the open space in question is surplus to requirements.
- 9.7 Policy DMD74 (Sports Pitches) is also considered to be of relevance which seeks to retain existing sports pitches and courts and does not support the loss of sports pitches in the borough.
- 9.8 The Council's Playing Pitch Strategy recognises the importance of good quality tennis facilities which are generally found in clubs and the importance of maintaining tennis facilities across the borough. The Council's Playing Pitch Strategy (PPS) indicates that the two tennis courts should be converted to a porous tarmacadam surface which suggests that the courts are currently of limited benefit to the tennis club and tennis in the locality due to the condition of the surface. It also stresses that the other courts at the tennis club should also be resurfaced or rebuilt.
- 9.9 In support of the proposal the application has been accompanied by a statement, the statement outlines that 5 of the 10 courts on both the application site and the adjacent site are disused at present, 2 of which are proposed to be lost as a result of this proposal. The statement also advises that the 5 courts still in use are proposed to be upgraded. It is also stated that the two courts proposed to be developed on have been used sporadically over the past 5 years, are only able to be used 6 months of the year and require constant maintenance and watering.
- 9.10 With regard to membership the statement outlines that since 2016 numbers of membership have generally been declining with last year being somewhat of an anomaly which is largely credited with people taking up recreational sport due to the COVID19 pandemic. The club has seen interest from players of a competitive nature, mainly due to the proposed plans for infrastructure improvements to other courts that will remain. The statement goes onto advise that without the release of the land for development these improvements to remaining courts will not be able to take place.
- 9.11 Given the previous reason for refusal, the applicant has also submitted a further document to provide clarity on the financial gain from the development of the site at Bush Hill Park Club and the use of funds to invest back into the club. The document states that the sale of the land would enable the club to obtain sufficient funds to carry out immediate remedial works to the club. modernise existing facilities, erect additional facilities for accessible use, reinstate the disused courts and enable the club to generate continuous additional revenue, through rent obtained from the dwelling they will obtain as part of the development. The proposed sale of the land would generate an additional 750k, which would be reinvested back into the club and the proposed unit would generate an additional income to support club facilities and upkeep. The proposed remedial works to the club are calculated at approximately £644, 500.00 (the breakdown was provided within the submitted document), however this figure may further increase due to current inflation and increasing associated labour costs. A potential surplus of approximately £105,500.000 would therefore be retained by the club for future maintenance and contingency and future reinstatement of the disused courts in Area B following an increase in demand for membership. It is anticipated

that once the clubs facilities are renewed, membership levels would increase over the next 2-5 years to a point where revenue could support ongoing upkeep of the club facilities, and allow for expansion through the reinstatement of the tennis courts within Area B. It is therefore considered that suitable evidence has been submitted to substantiate the origins of the appropriate funding and address the previous reason for refusal.

- 9.11 Notwithstanding the above, officers have also considered the comments of Sport England in consultation and note that whilst it is not ideal for the loss of the two existing tennis courts it is noted that the Lawn Tennis Association (LTA) have not objected and note that the improvements to the remaining facilities would meet Sport England's enhance principles. The LTA have advised that the two courts that would be lost cannot be used in winter due to their condition and that they are generally not heavily used by the club. They have also indicated that the club are seeking to use the funds generated from the sale of the two tennis courts to resurface the tarmac tennis courts. Sport England is aware that the LTA have liaised with the club to discuss other potential funding options to change the surface of the two courts but due to other priorities, including installing new sports lighting, the conclusion was that the club could not afford to take up a LTA loan and the only solution to them was to dispose some land.
- 9.12 Officers also note that the planning policy officer considered on balance the loss of the tennis courts to be acceptable following the submission of robust evidence.
- 9.13 In light of the above, officers on balance consider that sufficient evidence has been submitted to justify the loss of the two courts and furthermore it is noted that given improvements will be undertaken to the remaining infrastructure on the adjacent site, officers therefore consider that the proposal is acceptable in this regard.

## Proposed Residential Development

- 9.14 As previously stated the proposal is seeking to provide two pairs of semidetached dwellings to accommodate four residential units on site. Other than the Bush Hill Park Tennis and Social Club the surrounding area is predominantly residential in character.
- 9.15 In terms of land use, London Plan Policy H1 recognises the pressing need for new homes in London and to provide a real choice of affordable housing for Londoners. At a local level policy CP2 of the Enfield Core Strategy outlines the need to deliver additional housing stock for Enfield residents to meet housing demand. The proposal would contribute to delivering housing in the borough for which there is an identified need.
- 9.16 With regard to the amount of units on site, officers note paragraph 97 of the NPPF, which advises 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'. Officers have thus carefully considered the amount of units proposed relative to the site and its surrounding context and subject to other material planning considerations being considered acceptable maintain that the proposal would make an efficient use of the application site as well as providing further family accommodation within the Borough. Due regard has

also been given to policy H2 of the London Plan which recognises the role of small sites in delivering housing across London. It is therefore considered that the principle of residential development is considered acceptable.

# **Design and Heritage Considerations**

- 9.18 In terms of design, Core Strategy Policy 30 requires all developments to be high quality and design led, having special regard to their context. Meanwhile Policy DMD 37 seeks to achieve high quality design and requires development to be suitable designed for its intended function that is appropriate to its context and surroundings. The policy also notes that development should capitalise on opportunities to improve an area and sets out urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability, and diversity.
- 9.19 London plan policy London Plan Policy D1 has regard to local character and states in its overall strategic aim that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Policy D8 of the London plan outlines a similar aim and seeks for proposals in public places to be secure and easy to understand and maintain. Policy D4 of the London Plan sets out regional requirements in regard to architecture and states that development should incorporate the highest quality materials and design appropriate to its context.
- 9.20 With regard to heritage assets (in this case conservation areas) policy CP31 of the Core Strategy and policy DMD44 of the Development Management Document recognise the importance of preserving and enhancing heritage assets in the borough. Policy HC1 of the London plan advises 'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process'.

## Legibility / Character

- 9.21 The existing site is referred to in the Bush Hill Park Conservation Area Character Appraisal as originally being part of a golf club 'The Bush Hill Park Golf Club was started in 1895 and had its first club house in Queen Anne's Gardens, roughly on the site of no 12. No house of any kind then stood between the clubhouse and Bury Street to the south. The clubhouse was eventually moved to the west to become the pavilion of the tennis club that is now called Enfield Chase, close to St Stephen's Church'.
- 9.22 The appraisal goes onto advise that 'Within the core, there are two large areas of open green space, Enfield cricket ground and the Bush Hill Park Bowls, Tennis and Social Club. The cricket club, which was established in c 1856, is situated at the extreme north of the area, beyond a large block of modern flats, which acts as a visual stop to the view north along Wellington Road. The presence of the cricket ground, nevertheless helps to create a sense of spaciousness when approaching the Conservation Area from the

north, along Lincoln Road. The bowls and tennis club is tucked away in a central triangle of land behind Longleat, Wellington and Abbey Roads. Although largely hidden by houses, the club has had a significant impact on the on the atmosphere of the area for nearly a century. Other than the floodlighting equipment, it still retains an Edwardian ambience that influences the properties bounding the site. The clubhouse itself has been little altered over the years and is well maintained'.

- 9.23 The properties on the street comprise of established semi-detached two storey pairs of dwellings with a regular pattern and rhythm, a key characteristic of the properties on the street are front gardens typically comprising of privet hedging.
- 9.24 The scheme has been guided by the urban design and conservation officer and in the early stages there were concerns regarding the architectural approach, front gardens being dominated by car parking and waste storage, the positioning of the development in relation to adjoining properties and detailing and the design of the roof extensions which were previously flat roof dormers. However, the scheme has now evolved to rectify any initial concerns and thus the urban design officer and conservation officer raised no objections subject to appropriate conditions being attached to any permission. This was the case with the previous refused scheme ref. 20/01895/FUL, which is currently being considered at appeal.
- 9.25 Planning application ref. 20/01895/FUL was refused at Planning Committee on 3<sup>rd</sup> August 2021 for the following design related reason:
  - The proposed development, by virtue of its scale and massing through the provision of accommodation over three floors would result in a scale and form of development that is incongruous and detrimental to the character and appearance of the Bush Hill Park Conservation Area. This would be contrary to the National Planning Policy Framework (2021), Policies D4 and HC1 of the London Plan (2021), Policy CP30 of the Core Strategy (2010), Policies DMD37 and DMD44 of the Development Management Document (2014) and the Bush Hill Park Conservation Area Character Appraisal (2015)
- 9.25 However, the proposed development would serve as 4 x 4b7p dwelling houses thereby reading from the street scene and public realm as family dwellings to maintain the spatial pattern of the dwellings within the street scene. Additionally, suitable soft landscaping would be provided to serve the front garden which would be in keeping with the established pattern of development in the conservation area which features well vegetated frontages and generous street planting This is an important characteristic of the Bush Hill Park Conservation Area and the proposal would thereby seek to maintain these aspirations as outlined within the Character Appraisal and Management Proposals.
- 9.26 The dwellings immediately either site of the application site are designated in the Character Appraisal as making a positive contribution to the Conservation Area. It is therefore considered that the overall design following input from both the conservation officer and urban design officer would replicate the architectural detailing of these properties to complement the character and appearance of the locality.

- 9.28 The proposed development comprises of two pairs of semi-detached dwellings, which are two storey with a roof level that contains habitable floorspace. The development sits comfortably with adjacent dwellings on the street in terms of their height and building lines and would offer an acceptable height and alignment and would therefore be in keeping with the local character. The proposal seeks to provide gable end roof forms that read consistently along the street scene.
- 9.29 In order to accommodate accommodation in the loft level the proposal is seeking to provide rear dormer windows. The proposed dormer windows are hipped in nature and due to their set-in distances from the roof ridges, eaves and edges, achieve a suitable degree of subservience to the main roof face. Subject to a condition ensuring the dormer windows utilise matching materials to the main units this element of the proposal is considered acceptable from a design perspective.

# Appearance

# Dormer windows against DMD13

- 9.30 The proposed building is proposed to be a predominantly brick built development. The quality of the materials would be secured through an above ground works condition to ensure that the proposed brickwork to be used are of a suitable robustness and variation in tone and texture. Officers consider it necessary to also impose a condition requiring the brick bond to be Flemish in order to preserve and enhance the character and appearance of the Bush Hill Park Conservation Area.
- 9.31 The building would also be installing new proposed windows and balconies that are considered to be of an acceptable appearance in relation to the new buildings and the surrounding locality. To ensure that the proposed balconies and windows are of an acceptable design officers consider it necessary to impose prior to above ground works conditions requiring submission of specifications of balconies, windows and window reveals to ensure a satisfactory standard of external appearance is delivered. A condition is suggested to ensure that details of all of the external materials are submitted to and approved in writing by the Council.
- 9.32 Additionally, the development has been designed to provide refuse and recycling storage as well as cycle parking away from the front of the development to prevent external meter boxes and servicing intakes to be run internally to ensure that the development has a clean appearance without any external clutter to the proposed development thus ensuring no erosion to the character and appearance of the conservation area. Officers also consider it necessary to impose a condition requiring windows to be painted timber and for details of doors and windows to ensure a satisfactory standard of external appearance that would preserve and enhance the Bush Hill Park Conservation Area.

## Summary of Design and Appearance

9.33 Officers consider that the proposal has been carefully designed to be sympathetic to the character and appearance of the Bus Hill Park Conservation Area.

9.34 In light of this context, it is therefore considered that the proposed development would result in less than substantial harm to the character and appearance of the Bush Hill Park Conservation Area. Overall, the proposal is considered to be a well-designed development that represents a marked improvement on the existing tennis courts and would be in keeping with the character and appearance of the surrounding area, having regard to policies DMD6, DMD8, DMD37 and DMD44 of the DMD, CP30 and CP31 of the Core Strategy, D4, D8 and HC1 of the London Plan as well as the aims and intentions outlined within the Bush Hill Park Conservation Area Character Appraisal.

## Impact on Neighbouring Amenity

- 9.35 Policies DMD6 and 8 ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment and the principles contained in this policy have been applied in this case given the relationship to residential properties. Furthermore, Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity.
- 9.36 The site is located in an area that is predominantly residential in nature and thus it is considered that residential development of four additional dwelling houses would be in keeping within the locality given the siting of the application site within an established residential street and setting.

## Overlooking / Privacy

- 9.37 Officers have therefore carefully considered the impacts of the increased built form and nature of the development upon neighbouring properties, particularly adjacent to the application site of which the properties are residential in nature.
- 9.38 The proposal has been amended since initially submitted to sit more in line with adjoining properties particularly at the upper floor levels. The proposal seeks to provide flank windows, however it is noted that the adjoining properties on either side would not be subject to harmful overlooking as the adjoining properties do not comprise of side windows at present and as these flank windows serve secondary or non-habitable accommodation, an appropriate condition could be attached to obscured glazing and ensure that openable elements at set at more than 1.7 metres above the floor levels of the rooms the side windows at upper floor levels, having regard to policy DMD8 of the DMD.
- 9.39 To the rear of the application site are tennis courts that would be retained by the club and as such there are not considered to be any harmful privacy impacts as a result of the proposed development, having regard to policy DMD8 and DMD10 of the DMD.

#### Noise

9.40 It is noted that the proposed development of four dwelling houses would create an increase in noise when considered against the existing site context.

Sport England's comments are noted in terms of ensuring that the developer mitigates any potential unacceptable noise that might be experienced by the residents within the proposed flats. Due regard has been given to the fact that the site is located in an established residential setting for which the proposed development would be commensurate with. It is also pertinent to note that no objections in relation to noise has been raised by the Council's Environmental Health officer. Due regard has been had to the impact of the adjacent tennis courts upon future occupants, the environmental health officer has advised that tennis is a low intensity noise activity and unlikely to result in any marked harm upon neighbouring residential amenity, having regard to policies DMD68 of the DMD, CP32 of the Core Strategy and D14 of the London Plan.

9.41 It is acknowledged that there would be noise impacts upon properties in the locality during demolition and construction phases of the development, however these would be temporary in nature. To prevent any harmful noise and pollution impacts it is considered necessary to impose a condition requiring the submission and approval of a demolition and construction management plan to prevent any harmful impacts during these phases of the development. Subject to this condition the proposal is considered acceptable in relation to its noise impacts associated with the proposal.

# Daylight/Sunlight Impacts

- 9.42 Officers have had due regard upon the potential daylight and sunlight impacts arising from the proposal. It is noted that the proposed development sits in line with the front building lines of adjacent properties and as such it is maintained that no harmful daylight impacts would arise from this element of the proposal.
- 9.43 The proposed development would protrude approximately 3m beyond the rear elevation of adjoining dwellings at ground floor level, officers have carefully considered these impacts. It is noted that the proposed blocks are detached and set away from adjoining properties on each side by around 2.1m which provides mitigation upon these neighbours. There would be no intrusion into a 45-degree line when taken from the neighbouring properties. There would also be no intrusion into the 30 degree line when taken at the first floor level from both of the adjacent properties and thus the proposals would not be detrimental to residential amenities in regard to sunlight/daylight and outlook, having regard to policies DMD8 and DMD11 of the DMD.

# Summary

9.44 Officers note that the proposal would result in an increase in the number of units in the locality, however it is considered that the proposed development has been carefully designed to offset unacceptable amenity impacts on surrounding neighbouring residential amenity. In light of the above the proposal is considered acceptable in terms of residential amenity as stated.

## Quality of Accommodation

9.45 The London plan outlines the importance of delivering high standards of internal accommodation that meet the needs of occupants within policy D6 and that these must be of the highest standard both internally and externally. At a national level the DCLG space standards outline minimum internal floorspace standards that all new residential dwellings must accord with. The

Core Strategy states within policy CP4 states that 'High quality design and sustainability will be required for all new homes. New housing developments should take account of the design and construction policies and sustainable design and construction guidance set out in the London Plan'. The supporting London Plan Housing SPG provides detailed guidance on furniture arrangements, internal daylight/sunlight and circulation, amongst other considerations.

- 9.46 A 4b7p (three storey) dwelling should have a floorspace of 121 sq. m and 3 sq.m of built in storage. The submitted plans confirm that each unit exceeds the minimum floorspace standards at 233 sq.m. Furthermore, it is noted that each of the units would offer a good functional, internal layout with habitable rooms at ground floor level being dual aspect that can accommodate practical furniture layouts in line with standard 25 of the London Plan Housing SPG.
- 9.47 In relation to private amenity space standards, officers have carefully considered the requirements of policy DMD9 and standards 26 and 27 of the London Plan Housing SPG. Policy DMD9 of the DMD states that a 4b6p dwelling should have average amenity space of 50 sq.m across the site and a minimum of 35 sq.m. The submitted plans indicate that each dwelling would feature a private rear amenity space of 77 sq.m, which meets the standards alongside a small landscaping strip to the front garden area to provide an appropriate setting. It is therefore concluded that suitable amenity space has been provided across the site in accordance with policy DMD9 of the DMD.
- 9.48 The proposed plans also demonstrate that the units can accommodate practical furniture and storage layouts.
- 9.49 For the reasons stated above the proposed units are considered to offer an acceptable standard of accommodation that accords with the relevant development plan policy guidance.

## **Unit Mix**

- 9.50 In relation to delivering a balanced mix of housing policy H10 of the London Plan seeks to provide a balanced mix of housing types that meet the needs of Londoners today. Policy DMD3 of the Development Management Document re-iterates a similar objective and seeks for Enfield to have a mix of homes that meet needs of the Strategic Housing Market Assessment 2015 which seeks for a balance between smaller unit types and family sized dwellings.
- 9.51 The proposed mix comprises of the following dwelling types
  - x4b7p dwellings
- 9.52 Officers consider that the proposal given its quantum, location and character of the locality officers a policy compliant unit mix that would contribute to the Council's Strategic Housing Market Assessment (SHMA) and in particular the addition of family housing stock and thus is considered acceptable.

## <u>Transportation Impacts</u>

9.53 Policy DMD45 relates to car parking, cycle provision and parking design. Policy DMD 47 states that new development proposals will need to demonstrate that enough space for servicing, circulation and access to, from

and through the site is provided. All developments must be fully accessible to pedestrians and cyclists and assist with general permeability within an area. London Plan policy T6, DMD policy 45 (Parking Standards and Layout) and 47 (Access, New Roads and Servicing) states that operational parking for maintenance, servicing and deliveries is required to enable a development to function.

9.54 The Public Transport Accessibility Level (PTAL) of the site is 1b which indicates that there is poor access to frequent public transport services. The proposal does not seek to provide any off-street parking for cars and seeks to utilise on street parking.

#### Car Parking

- 9.56 Following comments from the council that the original approach proposed for off street parking was unacceptable due to the extent of originally proposed hardstanding in design and heritage terms, the application has now been revised and provides a parking survey which has been accompanied by the agent acting on behalf of the applicant. The survey which was undertaken between the hours of 0030-0530 is required on two separate weekday nights in line with the Lambeth Methodology for parking surveys.
- 9.57 The survey finds that the stress for parking in the vicinity is at a highest level of 24% which demonstrates that parking availability is adequate when considered against the guidance outlined in the Lambeth Methodology which advises that 80% indicates a stress on parking availability. In light of this when considered against the low PTAL of the application site and comments from the Council's transportation officer who raised no objection to a car free proposal in this location. Officers maintain that the approach to utilise on street parking is in this instance considered acceptable.

#### Cycle Parking

9.58 In terms of cycle parking, the proposal seeks to provide 2 cycle parking spaces in each of the private gardens. This is deemed acceptable in regard to number, and further details pertaining to size, type and design could be secured by an appropriate condition, should the scheme be granted.

#### Refuse, Waste and Recycling

- 9.59 Policy SI7 of the London Plan requires suitable waste and recycling storage facilities in all new developments whilst Core Policy 22 supports the provision of a sufficient, well-located waste management facility and requires all new developments to provide on-site waste treatment, storage and collection throughout the lifetime of the development.
- 9.60 Additionally, Policy DMD 57 notes that all new developments should make provision for waste storage, sorting and recycling, and adequate access for waste collection.
- 9.61 With regards to the new development, the waste management arrangements would involve collection from the proposed front gardens, however further details pertaining to number, design and size of the facilities would be secured by an appropriate condition, should the scheme be granted.

9.62 Given the above the application is considered acceptable in terms of refuse, waste and recycling.

## Sustainable Drainage

- 9.63 London Plan policies SI12 and SI13 require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 ("Managing flood risk through development") confirms the Council's approach to flood risk, inclusive of the requirement for SuDS in all developments. Policy DMD59 ("Avoiding and reducing flood risk") confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere and that planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in unacceptable levels of flood risk on site or increase the level of flood risk to third parties.
- 9.64 DMD61 ("Managing surface water") requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.
- 9.65 The site is not located in a flood risk area. However, a sustainable drainage strategy is required for the scheme and this will be secured through a precommencement condition.

## Biodiversity and Landscaping

- 9.66 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 the DMD policies 78 to 81. London Plan Policy GG2, G6 and G14 require development to protect and enhance designated nature conservation sites and local spaces, secure net biodiversity gains where possible and incorporate urban greening. Developments resulting in the creation of 100m2 of floorspace or one net dwelling or more should provide on-site ecological enhancements having regard to feasibility and viability. Policy DMD79 seeks the provision of on-site ecological enhancements.
- 9.67 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 179 (d) of the NPPF also states that opportunities to incorporate biodiversity in and around developments should therefore be encouraged.
- 9.68 The application site is situated on shale tennis courts, though it is noted that the site is located near green space. As a result, the site has little biodiversity or ecological value at present.
- 9.69 It is considered there would be a biodiversity enhancement as part of an overall landscaping scheme which is recommended to be conditioned. The proposal allows for landscaping works on site. Subject to a condition requiring biodiversity enhancements on site the proposal is considered acceptable.

- 9.70 London Plan Policy 5.10 promotes urban greening and multifunctional green infrastructure to help reduce effects of climate change and Policy 7.21 seeks to protect important trees and secure additional planting. London Plan Policy G5 supports urban greening and introduces the concept of an Urban Greening Factor and Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement.DMD81 sets out that developments must provide high quality landscaping that enhances the local environment and should add to the local character, benefit biodiversity, help mitigate the impacts of climate change and reduce water run-off.
- 9.71 The proposed development will include areas of landscaping to the front of the site, gardens to the rear and a green roof to the flat roof of the ground floor projection.
- 9.72 Several conditions would be attached to any grant of planning permission to ensure that the local environment is enhanced through appropriate landscaping.

# **Archaeology**

9.73 The application site is located within an area of archaeological interest. Following initial comments from GLAAS the applicant has provided a desktop based initial archaeological assessment. This has been reviewed subsequently by GLAAS who have raised no objections subject to a condition for the submission of a written scheme of investigation.

## 10. CIL

10.1 CIL would be calculated in accordance with the Mayor's adopted Community Infrastructure Levy Charging Schedule 2012 and Enfield's adopted Community Infrastructure Levy Charging Schedule 2016. The payments would be chargeable on implementation of the development. Using the Council's CIL calculator a breakdown in shown below:

Enfield CIL: £129,648.00 Mayoral CIL: £53,037.82 **Total CIL: £182,685.82** 

## 11. Public Sector Equality Duty

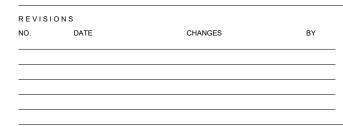
11.1 Under the Public Sector Equalities Duty, an equalities impact assessment has been undertaken. It is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

#### 12. Conclusion

12.1 The proposed redevelopment of the application site is welcomed in principle, and the application has been considered with regard to the National Planning Policy Framework (NPPF) and its presumption in favour of sustainable development.

- 12.2 The proposed redevelopment is considered to make efficient use of a small site to make a contribution to overall family housing stock in Enfield. The proposal has provided adequate information to on balance justify the loss of the existing tennis courts that will be developed on.
- 12.3 The proposal is considered acceptable in terms of land use, when considered against the surrounding context and location. The proposal is also considered acceptable in terms of design and heritage, neighbour amenity impact, transport impact, biodiversity and ecological enhancements. This is subject to conditions.
- 12.4 This report shows that the benefits of the proposed development have been given due consideration and are sufficient enough to outweigh any perceived harm. In this respect the benefits are summarised again as follows:
  - The proposed development would be consistent with the objectives of national, regional and local planning policy in terms of supporting and securing sustainable growth and delivery of new housing stock within the borough;
  - The development would provide make efficient use of a small site in delivering additional family housing within the Borough
  - The proposal has on balance provided justification for the loss of the existing tennis courts that are proposed to be developed on.
  - The development would not harm the character and appearance of the Bush Hill Park Conservation Area
  - The proposal offers a policy compliant standard of accommodation for future occupants
  - The development would not result in any harmful impacts upon neighbouring amenity
  - The proposal would not give rise to any significantly harmful transportation impacts in the locality.
- 12.5 Having regard also to the mitigation secured by the recommended conditions, it is considered the proposed development is acceptable when assessed against the suite of relevant planning policies and that planning permission should be granted subject to conditions.

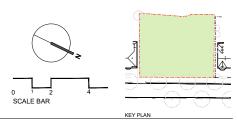




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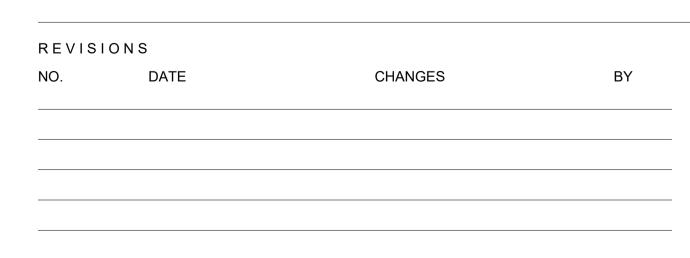
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PROJECT	Bush Hill Park Tennis Club, Abbey Road	PROJECT REF
CLIENT	DDDDDD Ltd	<del></del>
		REV.
DRAWING TITLE	Aerial View Across Site	
DATE		DWG. NO.
SCALE@A1	DRAWN BY AR	$\overline{}$
SCALE@A3	CHECKED BY MK	<u> </u>



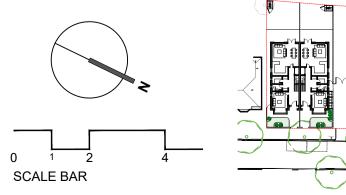


SCALE@A1 1:100 SCALE@A3 1:200

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# KEY PLAN

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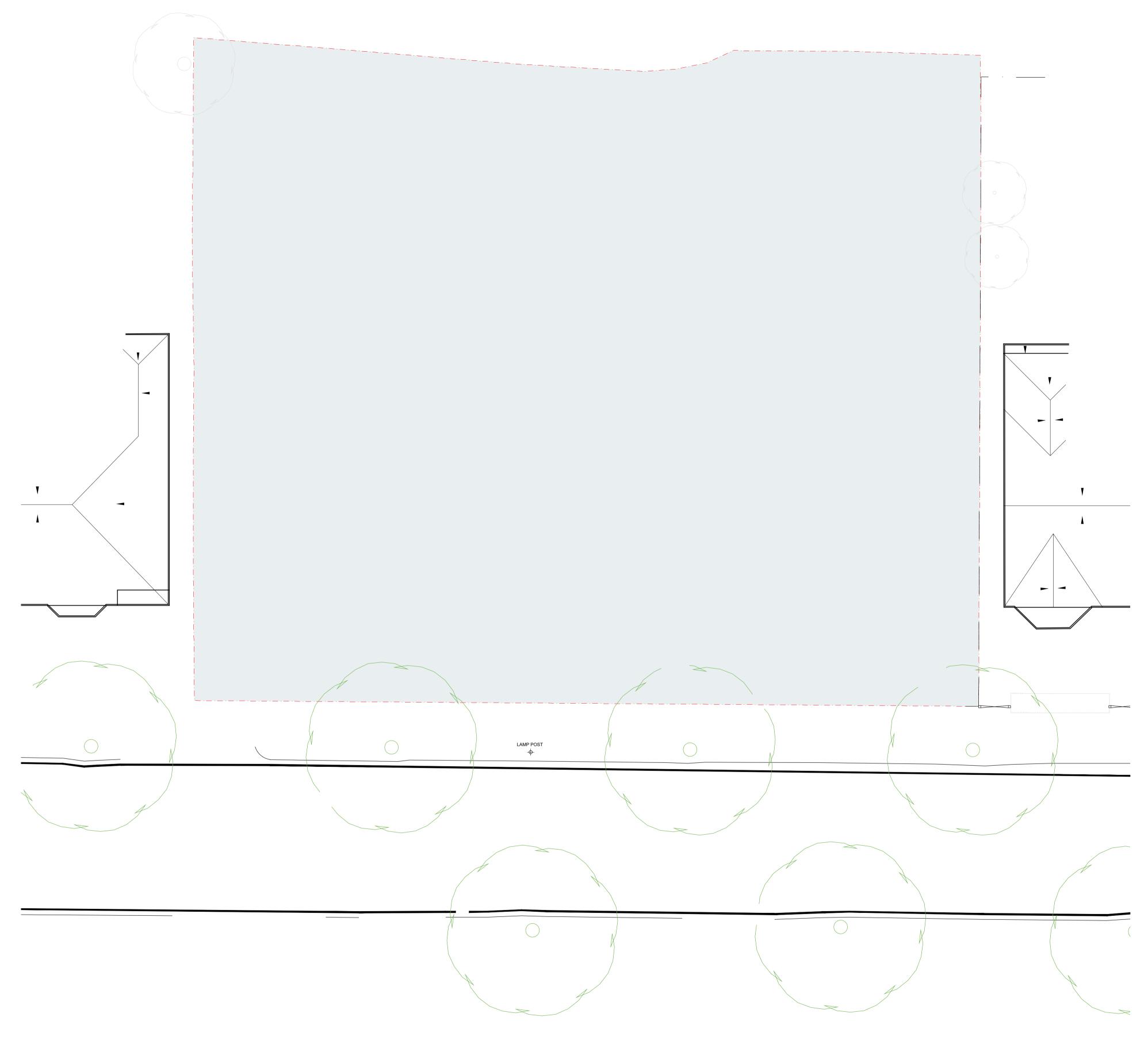
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	PROJECT	Bush Hill Park Tennis	Club, Abbe	y Road
	CLIENT	DDDDDD Ltd		
		Planning		
		Existing and Propose	ed	
	DRAWING TITLE	Street Elevations		
	DATE	04.08.2021		
	SCALE@A1	1:100	DRAWN BY	MK
/	SCALE@A3	1:200	CHECKED BY	

PROJECT REF
REV.
DWG. NO.
 PL-006
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EXISTING
SITE PLAN

PL-000 SCALE@A1 1:100 SCALE@A3 1:200

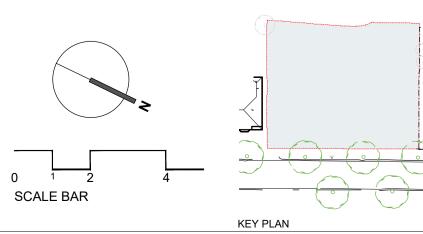
REVISIONS
NO. DATE CHANGES BY

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PROJECT	Bush Hill Park Ten	nis Club, Abbey Road
CLIENT	DDDDDD Ltd	
	Planning	
	Existing	
DRAWING TITLE	Site Plan	
DATE		
SCALE@A1	1:100	DRAWN BY AR
SCALE@A3	1:200	CHECKED BY MK

PROJECT REF

REV.

- PL-000



# The financial reinvestment proposed through the sale of 2 tennis courts at The Bush Hill Park Club

Application site: Bush Hill Park Bowls Tennis And Social Club, Abbey

Road, Enfield, EN1 2QP

Proposed development:

Redevelopment of site including the removal of 2 disused tennis courts, subdivision of site and the erection of 2no blocks comprising 2 self-contained dwellings each, together with refuse and bicycle

storage.

This document has been generated to provide clarity on the financial gain from the development of the site at The Bush Hill Park Club, and the use of funds to invest back into the club.

Please note that that this is an enabling development to secure the future operation of the club, as the club has no other means to generate the required funds. This is detailed further in the letter issued by the club secretary Adrian Shaw to Enfield Councils planning department in July 2021 (as part of the last planning submission). Adrian's letter expands upon this development and financial matters and should be read alongside this document.

## What is being proposed

The development involves the sale of 2 out of 5 disused tennis courts. The location of the courts to be sold as part of this development are outlined in the aerial photo on the next page as follows:

- Area A 2 disused tennis courts that are to be sold as part of this development
- 2. **Area B** 3 disused tennis courts that are to be developed for future membership demands at the club.

The club currently operates with 5 disused courts surplus to requirement. The loss of two tennis courts therefore will not impact the operation of the club, as there are three other disused courts that are to be modernised and re-instated for increased membership demands in the future.

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Bush Hill Park Club Financial reinvestment

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# How this development will enable re-investment back into the club

The sale of the land (area A) is to enable the club to obtain sufficient funds to:

- 1. Carry out immediate remedial works to the club
- 2. Modernise existing facilities
- 3. Erect additional facilities for accessible use
- 4. Reinstate the disused courts
- 5. Enable the club to generate continuous additional revenue, through rent obtained from the flat that they will obtain as part of this development. (note, the flat will fall under the ownership of the club, as a club asset).

A breakdown of the financial investment required is provided on the next page. In summary:

- 1. The club is to receive the following from the sale of the land:
  - a. £750k for reinvestment
  - A residential flat to generate an additional income to support club facilities and upkeep
- The remedial works to the club are calculated to cost £644,500.00. We have been advised that this figure is likely to increase, due to the increase in cost and demand for materials due to the Covid lockdown
- 3. A potential surplus of £105,500.00 for the club to maintain for:
  - a. future maintenance and contingency
  - b. future reinstatement of the disused courts in Area B (page 2) following an increase in demand for membership

It is anticipated that once the clubs facilities are renewed, membership levels will increase over the next 2-5 years to a point where revenue can support the ongoing upkeep of the club facilities, and allow for expansion through the reinstatement of the tennis courts within Area B.

For the avoidance of any doubt, we would like to confirm that the funds gained by the sale of the two tennis courts is to be re-invested back into the club, which includes the reinstating the disused tennis courts.

The reinstatement of the disused tennis courts are to be programmed alongside the increase in demand and membership levels at the club, to ensure sustainable reinvestment back into the club against current demands, as these courts will need to generate sufficient membership levels to generate revenue for maintenance.

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# **BUSH HILL PARK CLUB - BREAKDOWN OF WORKS REQUIRED**

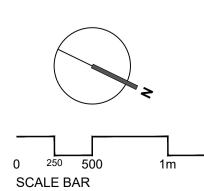
	AREA		COST
	External		
1	Resurface to 3 tennis courts	£	75,000.00
2	Provision of accessible toilet by tennis courts	£	45,000.00
3	Resurface to access road and both car parks. No surface water drainage adjacent to access		
	road need to look at pervious finishes.	£	55,000.00
4	Footpath to tennis courts needs to be levelled out and resurfaced.	£	15,000.00
5	Perimeter fences that belong to the club to be renewed.	£	16,500.00
6	Overhaul clubhouse roof replacing tiles, rotten rafters, battans, installing insulation etc plus		
	works to turret making roof completly watertight for 20 years . This includes gutters,		
	drainpipes and flashings and roof to covered way. Including the cost of scaffold with tin roof.	£	98,500.00
7	Pointing all external brickwork except the new extension.	£	7,500.00
8	Replace timber windows where required due to rotten timbers and external redecoration		
	throughout.	£	40,000.00
	Internal		
9	Back inlet gully required where open grating is for kitchen waste.	£	3,500.00
10	Heating - design consultant required to design a scheme for zoning the building and air		
	conditioning in bar area. New boiler will be required.	£	24,500.00
11	Enlarge opening between bar and hall and add sliding folding doors so that hall and bar can		
	be opened out as one area.	£	11,000.00
12	Toilets, showers and changing rooms to be completely refurbished/redesigned.	£	67,500.00
13	Works to bar area and cellar - upgrade. Including new carpet to lounge area etc.	£	55,000.00
	Improvements		
14	Changing the existing staircase with access up from the existing corridor. Subsequently redesign the first floor door entrances etc.	£	16,500.00
15	Petanque court	£	17,000.00
16	Pergola between tennis and bowls	£	32,000.00
17	Potential development of areas to north of courts 4&5 to provide additional sports facilities such as mini tennis	£	65,000.00
	TOTAL	E	644,500.00

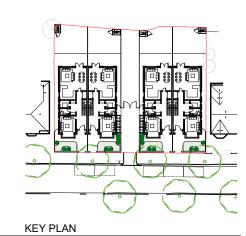


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PROJECT	Bush Hill Park Tennis	Club, Abbe	y Road
CLIENT	DDDDDD Ltd		
	Planning Proposed D	etailing	
	Front Elevation		
DRAWING TITLE	Addressing Gaps Bet	ween Struct	ures 2
DRAWING TITLE DATE	Addressing Gaps Bet 16.07.2021	ween Struct	ures 2
	<u> </u>	ween Struct	ures 2 MK
DATE	16.07.2021		

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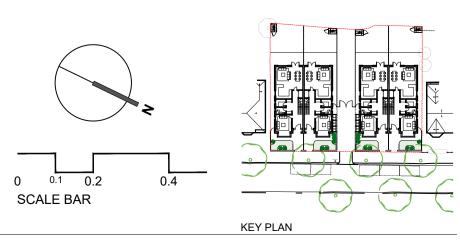


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Registered company number: 6044594



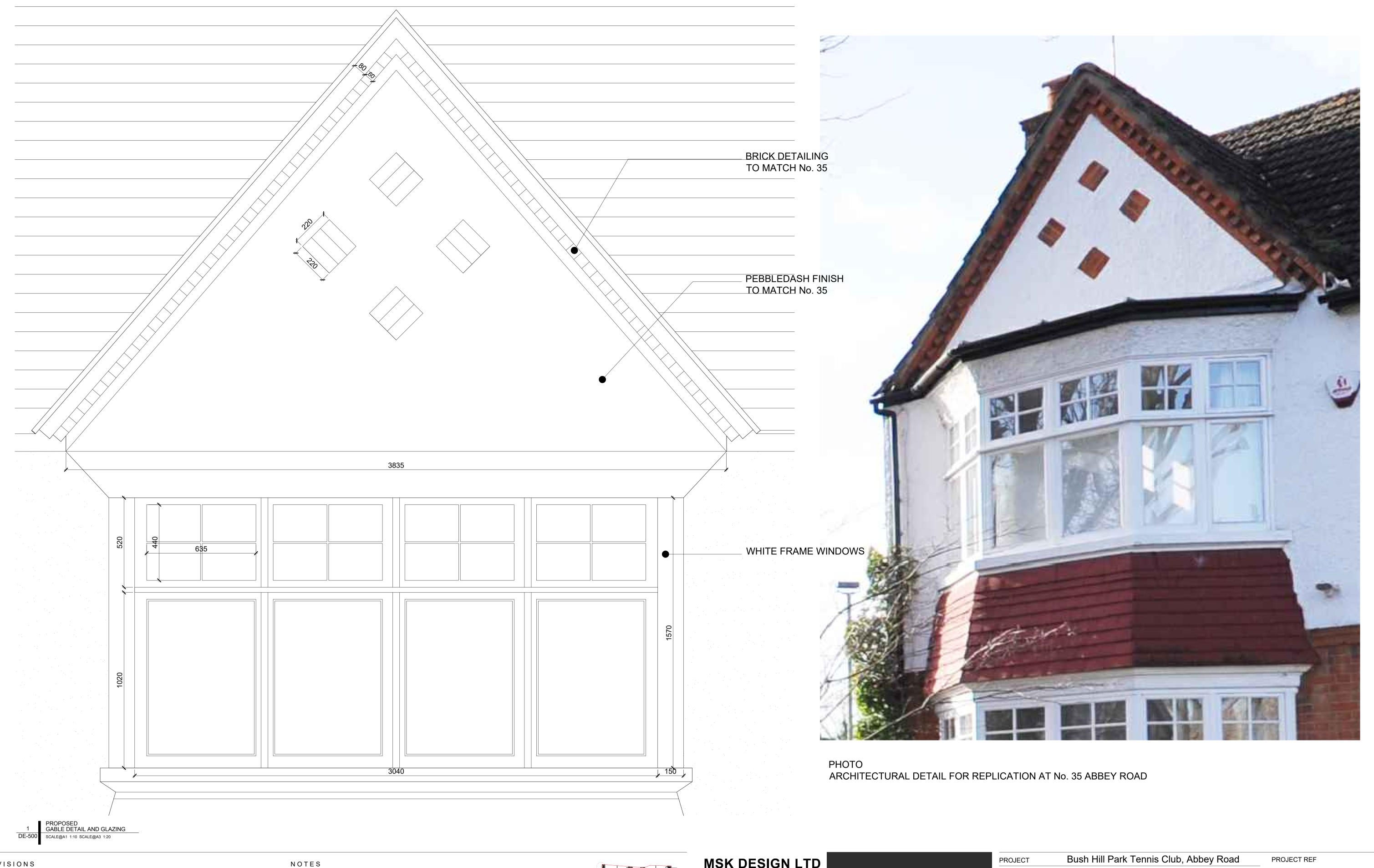
PROJECT	Bush Hill Park Tennis	Club, Abbe	y Road
CLIENT	DDDDDD Ltd		
	Planning		
	Proposed Detailing		
DRAWING TITLE	Front Elevation - Bay	window and	d Porch
DATE	16.07.2021		
SCALE@A1	1:10	DRAWN BY	MK
SCALE@A3	1:20	CHECKED BY	

PROJECT REF

REV.

DWG. NO.

DE-501

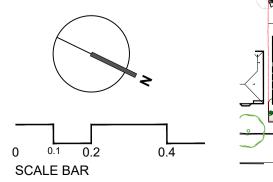


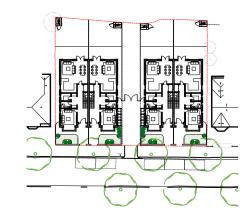
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KEY PLAN

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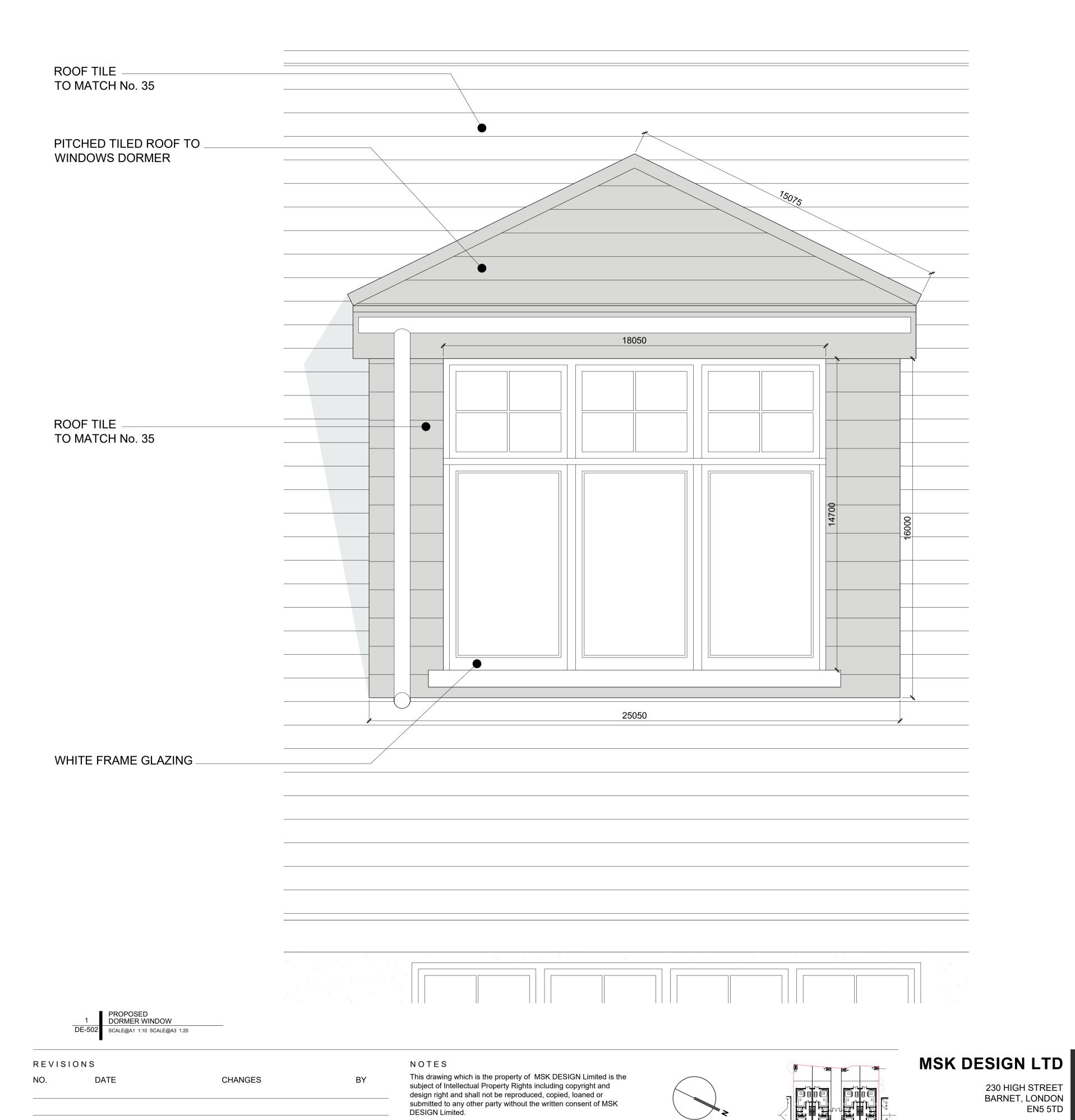
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Registered company number: 6044594



PROJECT	Bush Hill Park Tennis	Club, Abbe	y Road
CLIENT	DDDDDD Ltd		
	Planning		
	Proposed Detailing		
DRAWING TITLE	Front elevation - Gab	le and Glazi	ng
DATE	16.07.2021		
SCALE@A1	1:10	DRAWN BY	MK
SCALE@A3	1:20	CHECKED BY	

REV.



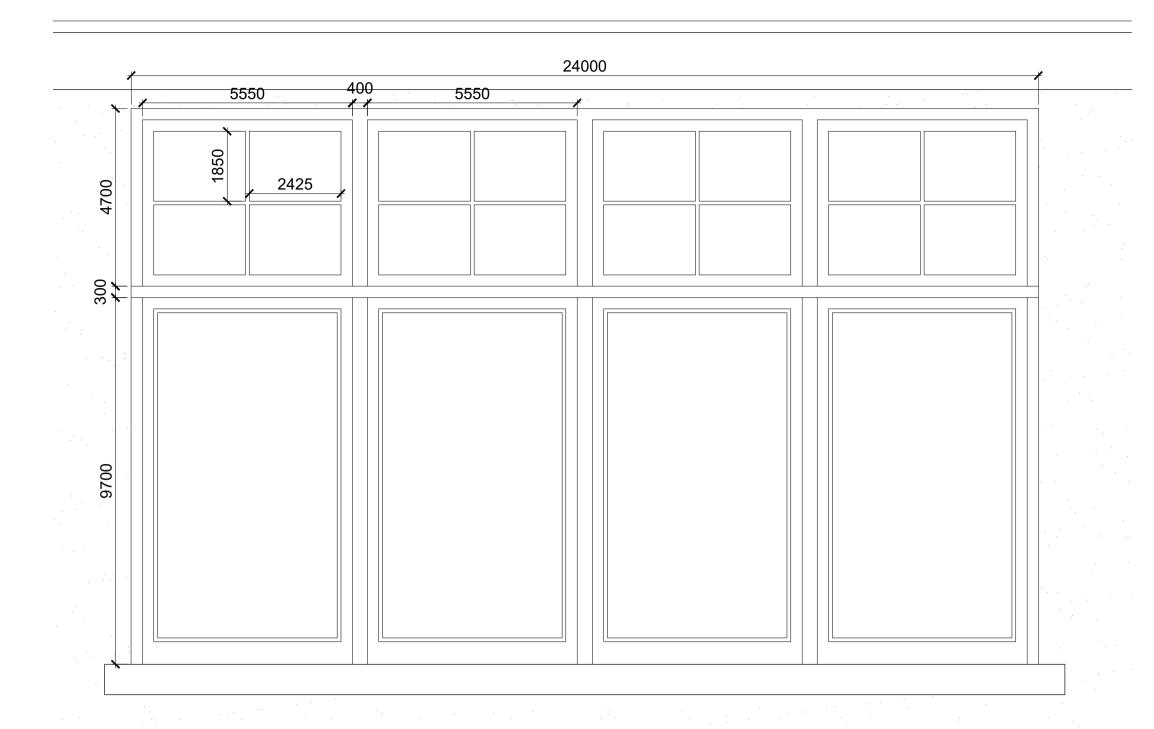
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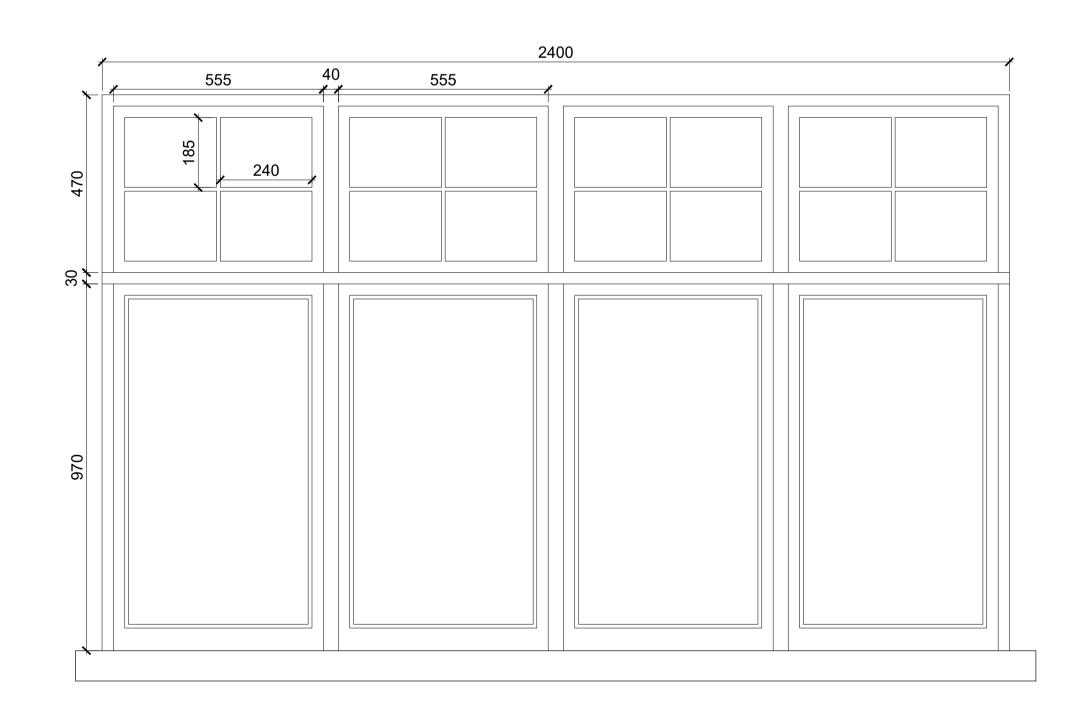
KEY PLAN

SCALE BAR



PROPOSED
TYPICAL WINDOW AT FIRST FLOOR LEVEL (FRONT)

DE-502 SCALE@A1 1:10 SCALE@A3 1:20



PROPOSED
TYPICAL WINDOW AT GROUND FLOOR LEVEL (FRONT)

DE-502 SCALE@A1 1:10 SCALE@A3 1:20

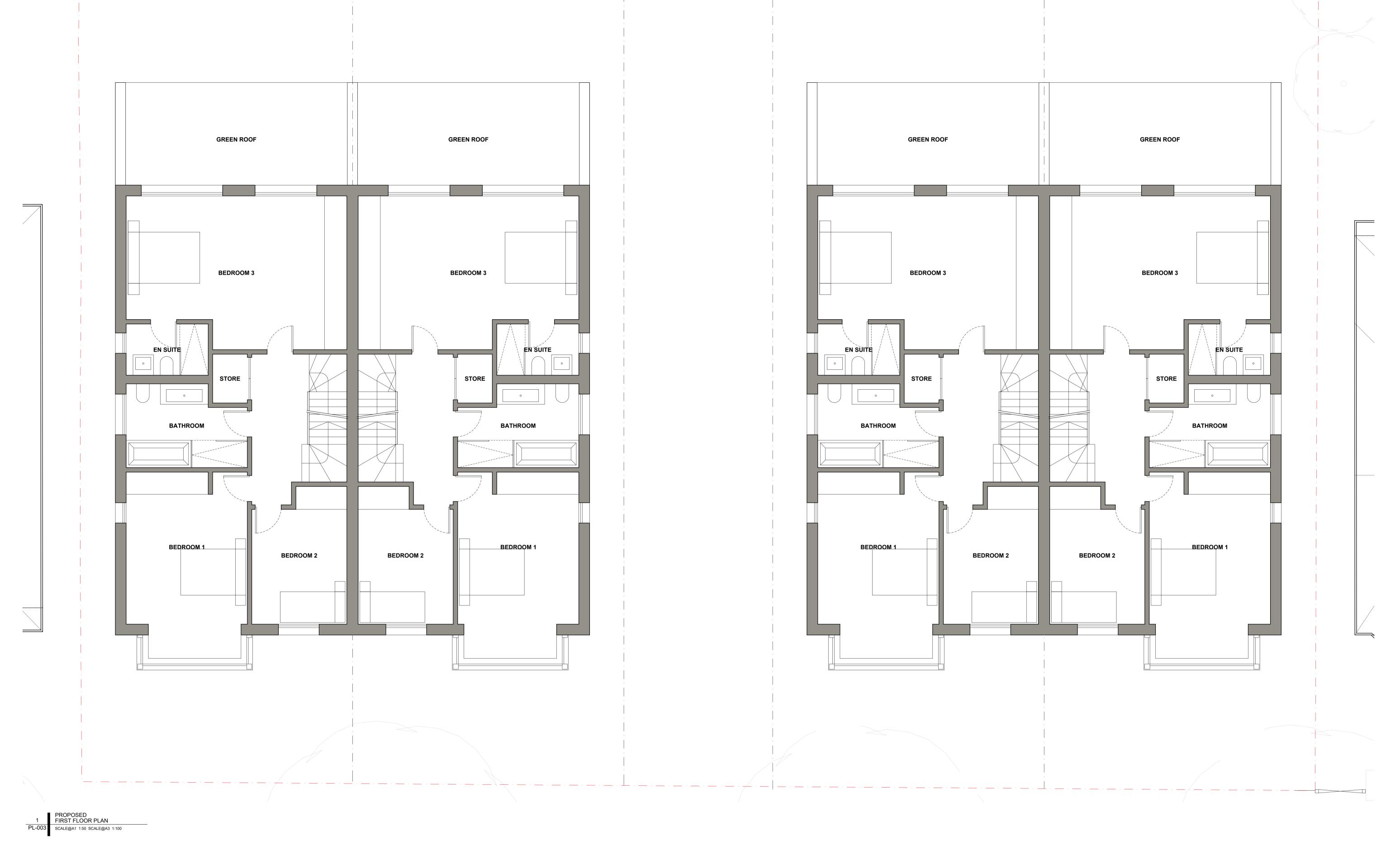


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PROJECT	Bush Hill Park Tennis C	lub, Abbe	y Road	PROJECT REF
CLIENT	DDDDDD Ltd			_
	Planning			_
	Proposed Detailing			REV.
DRAWING TITLE	Dormr Window, and Window,	ndows to t	he Front E	evation
DATE	16.07.2021			DWG. NO.
SCALE@A1	1:10	RAWN BY	MK	
SCALE@A3	1:20	CHECKED BY		DE-302

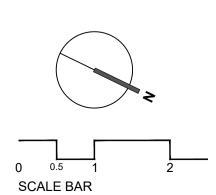


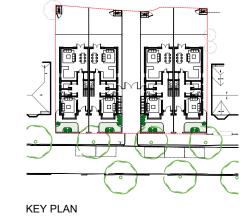
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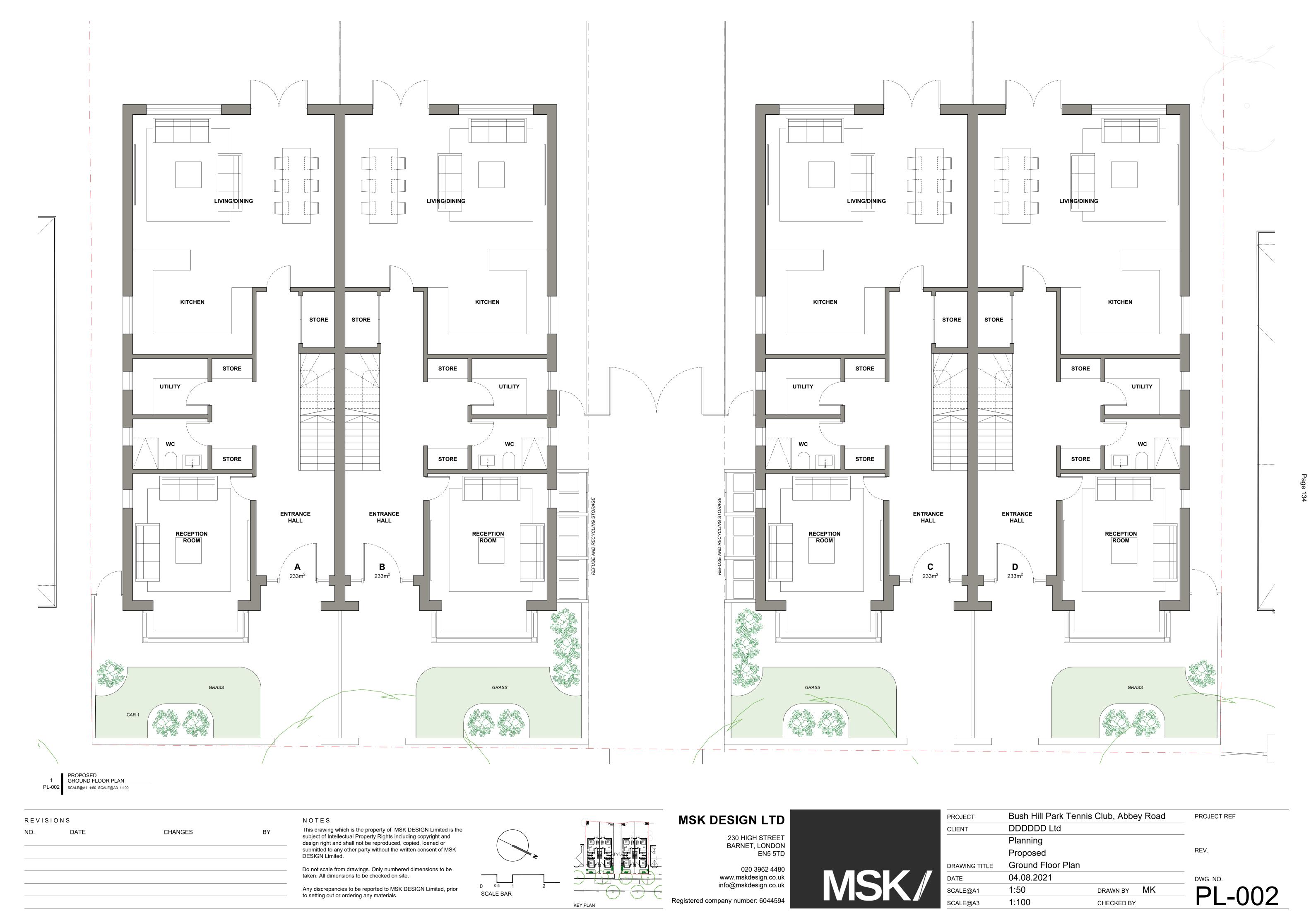
PROJECT	Bush Hill Park Tennis Club, Abbey Road		
CLIENT	DDDDDD Ltd		
	Planning		
	Proposed		
DRAWING TITLE	First Floor Plan		
DATE	04.08.2021		
SCALE@A1	1:50	DRAWN BY MK	
SCALE@A3	1:100	CHECKED BY	

PROJECT REF

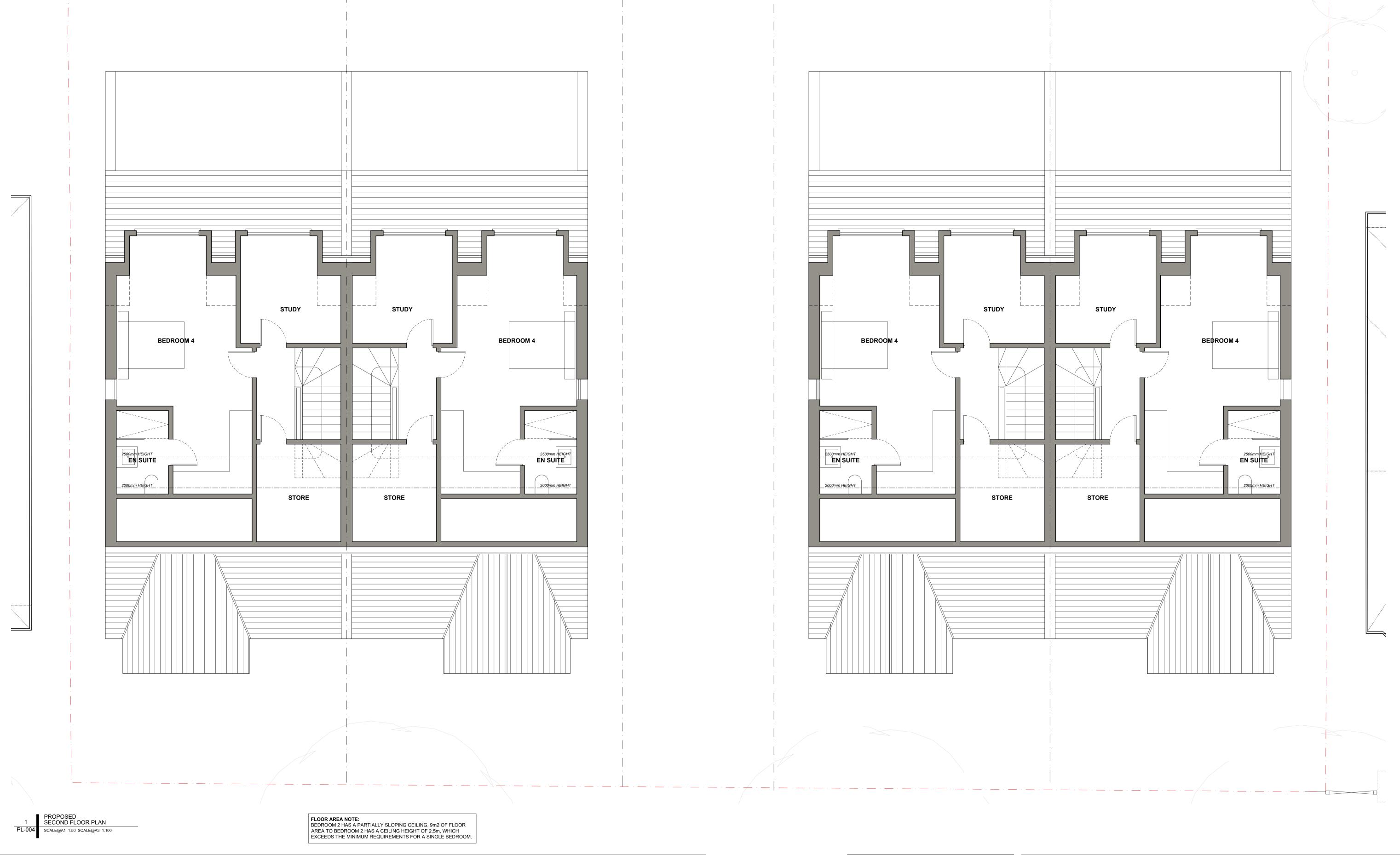
REV.

DWG. NO.
PI -003









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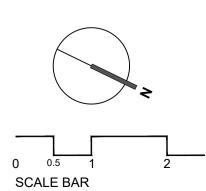
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NO. DATE CHANGES BY

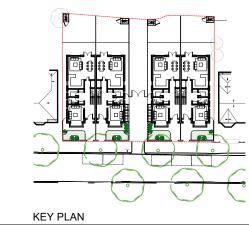
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	PROJECT	Bush Hill Park Tennis Club, Abbey Road		
	CLIENT	DDDDDD Ltd		
		Planning		
		Proposed		
	DRAWING TITLE	Second Floor Plan		
	DATE	04.08.2021		
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REV.

PROJECT REF

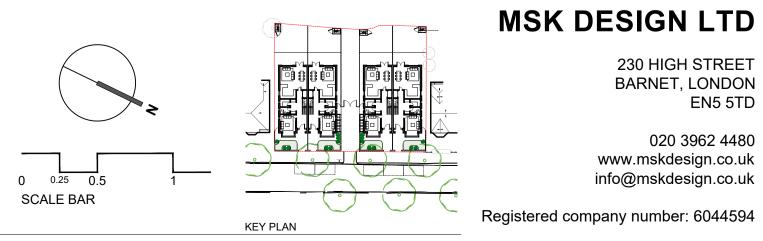
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	PROJECT	Bush Hill Park Tennis Club, Abbey Road		
	CLIENT	DDDDDD Ltd		
		Planning		
		Proposed		
	DRAWING TITLE	Section		
	DATE	04.08.2021		
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	SCALE@A3	1:50	CHECKED BY	MK

PROJECT REF REV.



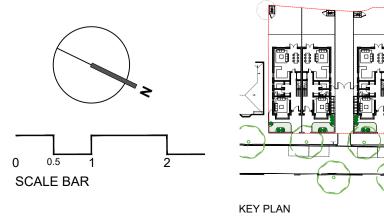
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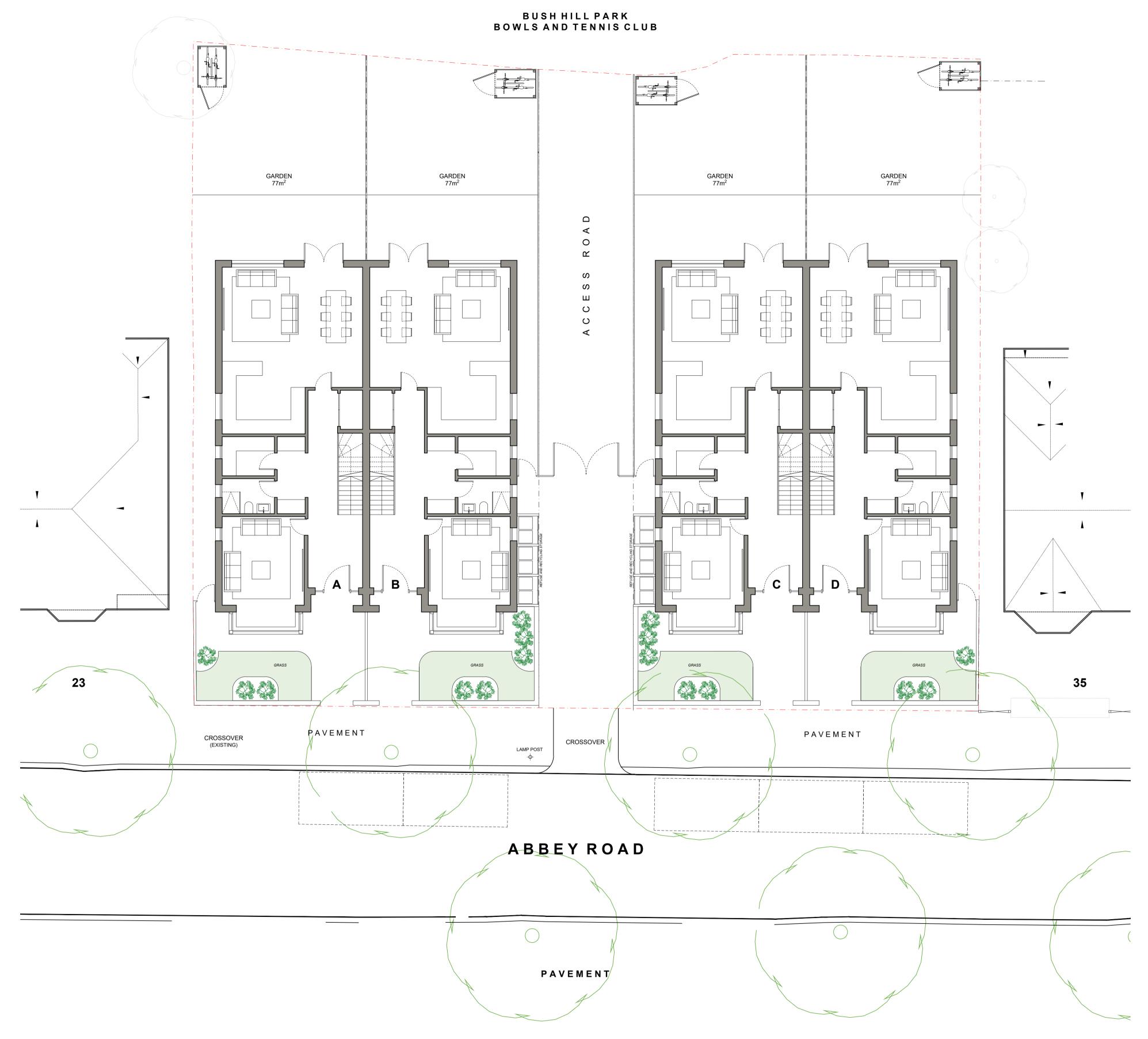
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	PROJECT	Bush Hill Park Tennis Club, Abbey Road		
	CLIENT	DDDDDD Ltd		
		Planning		
		Proposed		
	DRAWING TITLE	Elevations		
	DATE	04.08.2021		
	SCALE@A1	1:50	DRAWN BY	MK
	SCALE@A3	1:100	CHECKED BY	

oad	PROJECT REF
	REV.
(	PL-008



PROPOSED
SITE PLAN
PL-001 SCALE@A1 1:100 SCALE@A3 1:200

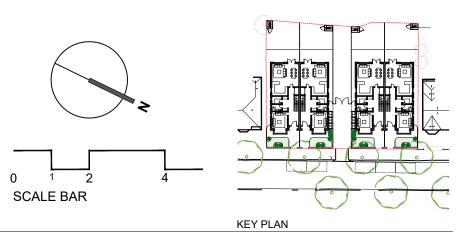
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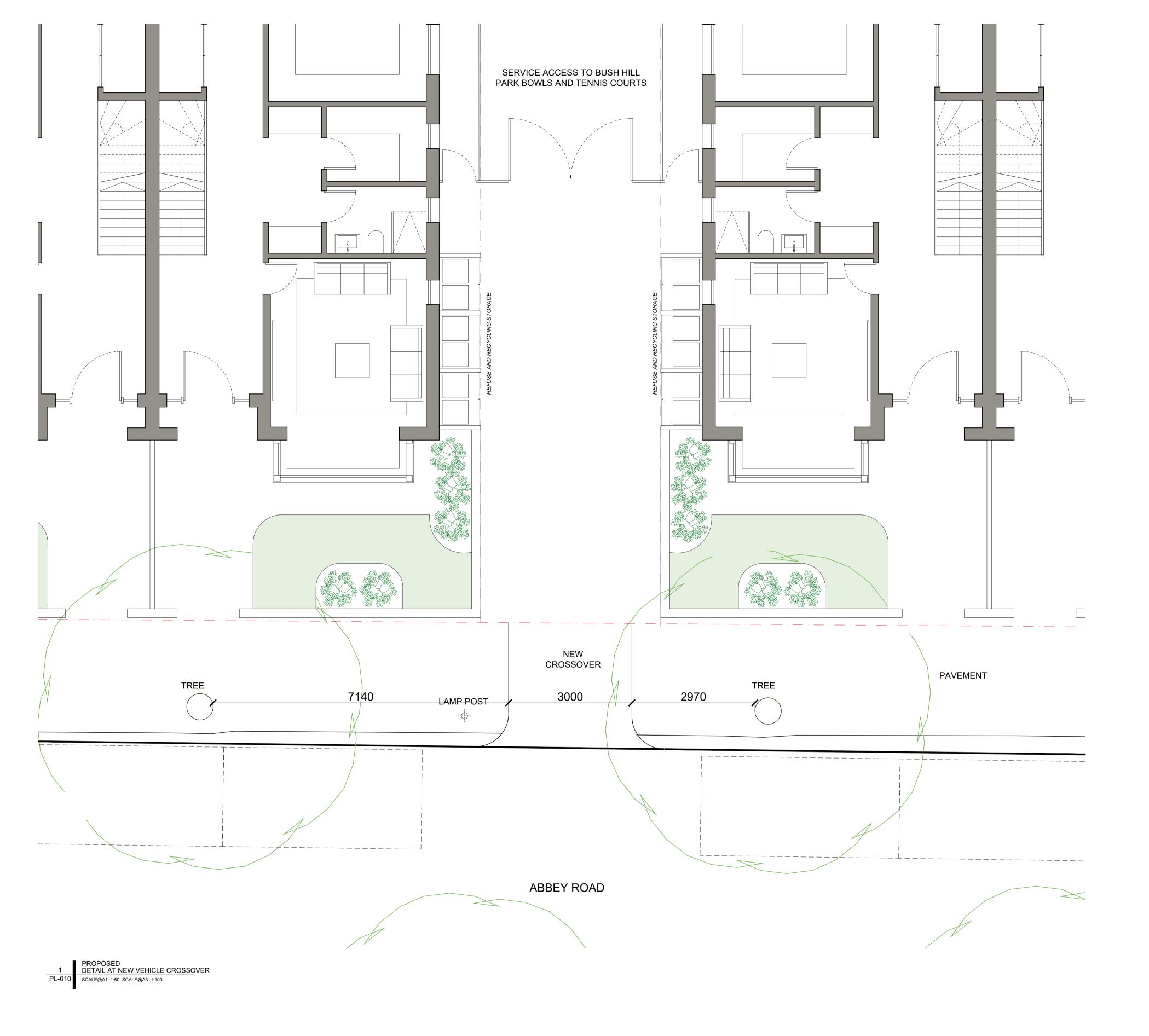
PROJECT	Bush Hill Park Ten	Bush Hill Park Tennis Club, Abbey Road		
CLIENT	DDDDDD Ltd			
	Planning			
	Proposed			
DRAWING TITLE	Site Plan			
DATE	04.08.2021			
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SCALE@A3	1:200	CHECKED BY		

PROJECT REF

REV.

DWG. NO.

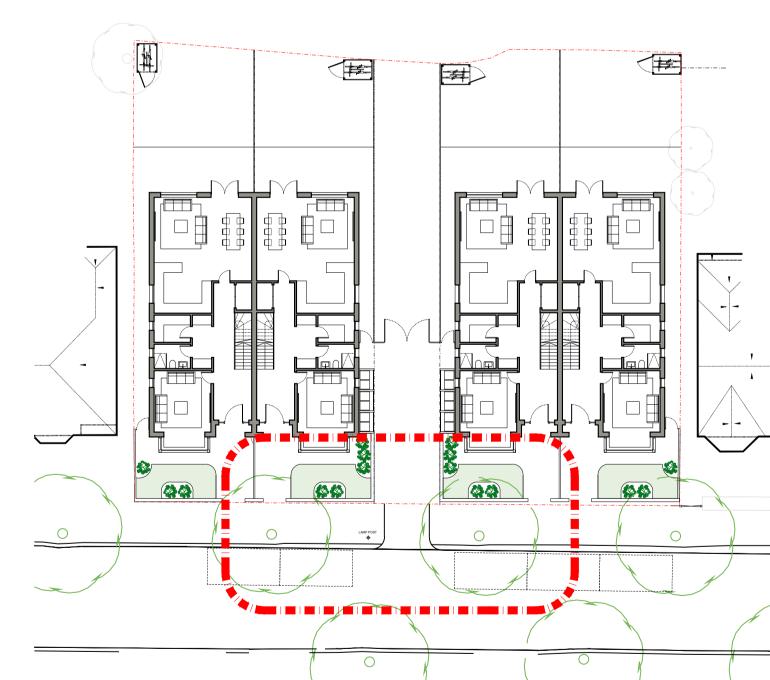
\_ DWG. NO. \_ PL-001



# THE PROPOSED CROSSOVER AND STREET TREES

THE PROPOSED CROSSOVER FOR THE NEW SERVICE ACCESS TO THE BUSH HILL PARK TENNIS CLUB WILL BE INSTALLED IN ACCORDANCE WITH THE HIGHWAYS REGULATIONS, WHICH ADDRESS CONSIDERATIONS FOR CARS IN THE PUBLIC HIGHWAY, PEDESTRIANS AND TREES.

THE PROPOSED CROSSOVER IS LOCATED 2970mm TO THE NEAREST TREE, THIS IS UNDERSTOOD TO BE SIGNIFICANTLY IN EXCESS OF THE HIGHWAYS MINIMUM DISTANCE REQUIREMENTS TO PROTECT TREES.



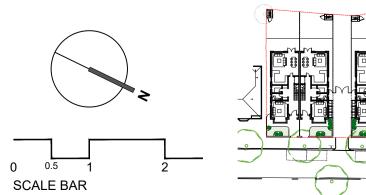
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	PROJECT	Bush Hill Park Tennis Club, Abbey Road		
	CLIENT	DDDDDD Ltd		
		Planning		
		Proposed		
	DRAWING TITLE	Vehicle Crossover		
	DATE	29.03.2021		
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	SCALE@A3	1:100	CHECKED BY	

PROJECT REF REV.

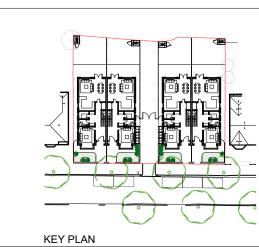


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	PROJECT	Bush Hill Park Tennis	Club, Abbe	y Road
	CLIENT	DDDDDD Ltd		
		Planning		
		Proposed visual		
	DRAWING TITLE	Front Elevation 1		
	DATE	04.08.2021		
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	SCALE@A3		CHECKED BY	

PROJECT REF

REV.

DWG. NO.

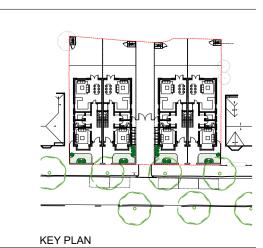


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	PROJECT	Bush Hill Park Tennis	Club, Abbe	y Road
	CLIENT	DDDDDD Ltd		
		Planning		
		Proposed visual		
	DRAWING TITLE	Front Overview		
	DATE	04.08.2021		
	SCALE@A1		DRAWN BY	MK
	SCALE@A3		CHECKED BY	

PROJECT REF

REV.

CGI -



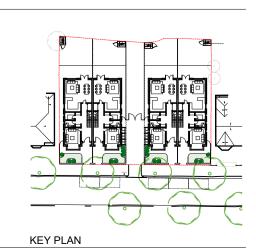
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PROJECT Bush Hill Park Tennis Club, Abbe	y Road
CLIENT DDDDDD Ltd	
Planning	
Proposed visual	
DRAWING TITLE Front Elevation 2	
DATE 04.08.2021	
SCALE@A1 DRAWN BY	MK
SCALE@A3 CHECKED BY	

PROJECT REF

REV.

CGI - 2

PROPOSED ROOF PLAN

PL-005 SCALE@A1 1:50 SCALE@A3 1:100

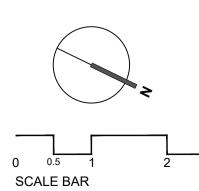
REVISIONS			
NO.	DATE	CHANGES	ВҮ

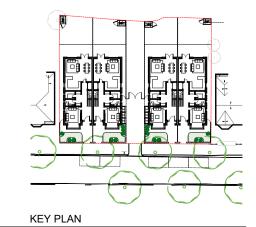
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PROJECT	Bush Hill Park Tennis Club, Abbey Road	
CLIENT	DDDDDD Ltd	
	Planning	
	Proposed	
DRAWING TITLE	Roof Plan	
DATE	04.08.2021	
SCALE@A1	1:50	DRAWN BY MK

PROJECT REF

REV.

PL-005



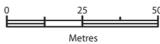






Bush Hill Park Bowls Tennis And Social Club, Abbey Road, Enfield

Scale 1:1250



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The representation of features as lines is no evidence of a property boundary.

Date Of Issue: 22 July 2020 Supplied By: Getmapping Supplier Plan Id: 240580\_1250 OS License Number: 100030848 Applicant: Michael Koutra Application Reference: Bush Hill Park Tennis Courts



LONDON BOROUGH OF ENFIELD			
PLANNING COMMITTEE		<b>Date:</b> 22 March 2022	
Report of Head of Planning - Vincent Lacovara	Contact Officer: Andy Higham Joseph McKee joseph.mckee@ent	field.gov.uk	<b>Ward:</b> Ponders End/Enfield Highway
Application Number: 21/04791/RM		Category: Major	

**PROPOSAL:** Details of reserved matters (appearance and landscape) for phases 2 and 3 of the Exeter Road Estate development, pursuant to Condition 3 of outline planning permission 21/02076/OUT, comprising the refurbishment and extension of Crediton House and Ashburton House and construction of two development blocks along Exeter Road comprising 83 residential dwellings (Use Class C3) with associated means of access, car and cycle parking, hard and soft landscaping, play, public, communal and

private realm, highways works, and other associated works and improvements, including works to existing parking podiums and landscape enhancement works to Durants Park.

LOCATION: Exeter Road Estate, Exeter Road, Enfield, EN3 7TW

Applicant Name & Address:
LBE Housing

Agent Name & Address:
HTA, 78 Chamber Street, London, E1 8BL

#### **RECOMMENDATION:**

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

#### 1. Note for Members

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

#### 2. Recommendation

- 2.1. That the Head of Development Management be authorised to **GRANT** planning permission subject to conditions; and
- 2.2. That delegated authority be granted to the Head of Development Management to finalise the wording of the of the recommended conditions as set out in this report:
  - 1. Approved drawings
  - 2. Wheelchair user dwellings
  - 3. Landscaping
  - 4. External materials
  - 5. Full podiums elevational detail
  - 6. Information parking bay buffers along Exeter Road
  - 7. Compliance with fire strategy
  - 8. Energy strategy compliance and verification

# 3. Executive Summary

- 3.1. Members resolved to grant planning permission through a hybrid planning application (ref. 21/02076/OUT) comprising 129 new homes and associated works at 31st August 2021 Planning Committee. The planning permission was issued on 22nd December 2021 following finalisation of the Shadow S106 Agreement. Full planning permission was granted for Phase 1, comprising 46 new homes, and outline planning permission granted for the remaining 83 within Phases 2&3 with matters of appearance and landscaping being reserved.
- 3.2. The approved development safeguards all existing 230 existing homes on the estate, it maximises the use of underutilised brownfield land and addresses the existing inefficiencies across the estate to improve access to and from the site as well as the surrounding greenfield land at Durants Park. The approved scheme secures 100 per cent affordable housing split across a policy complaint tenure mix and delivers 59no. 3-bedroom plus new homes.
- 3.3. This is a reserved matters application submitted pursuant to the outline permission and provides further detail on the appearance blocks within Phases 2 and 3 and the landscaping for these phases. The proposals follow on from the principles established through the outline scheme, the approved design code, parameter plans and various site-wide approved strategies, including highways and SuDS.
- 3.4. The proposals will deliver high quality new homes, in buildings that will contribute to the character of the area and which will sit within a repurposed, well landscaped setting that provides good quality amenity for both existing and new residents.

#### 4. Site and Surroundings

- 4.1. The Exeter Road Estate is a mid-century residential estate comprising 230 dwellings located within both the Ponders End and Enfield Highway Wards; with the ward boundary being located along Exeter Road itself (east-west).
- 4.2. The estate currently comprises two pairs of fourteen storey residential towers (four in total), each containing 50 homes; Tiverton House, Ashcombe House, Honiton House and Newton House (from west to east). Each respective pair of towers benefits from a central two-level parking podium (two in total) which are at present underutilised. In addition, Crediton House, located centrally within the estate, and Ashburton House, the building furthest to the east, are each existing double stacked maisonette blocks of four storeys containing 16 and 14 homes respectively.
- 4.3. The existing buildings on the estate are mostly surrounded by a public realm and street environment that is quite inactive, with grassed areas often quite inaccessible, due to low set railings in parts of the site. The general public realm offers limited usability for the existing estate occupiers.
- 4.4. Exeter Road runs east-west through the estate, with smaller perimeter estate roads running off from this. South of the site are Exeter Road and Arbour Road, which link onto the east-west part of Exeter Road. Brookfields, a cul-de-sac, with no direct access through to Exeter Road, is located south of the site. North of Brookfields, within the boundary of the site is a vacant piece of overgrown brownfield land which previously accommodated the Wessex Hall Community Centre. However, this was demolished approximately 10 years ago.
- 4.5. Exeter Road, Arbour Road and Brookfields link the site with The Ride and are residential in nature comprising low-rise primarily terraced dwellings of a suburban character. Alexandra Road is located south-east of the site which has a pedestrian link through to Durants Park. Alexandra Road, closest to the site, comprises uses of an industrial nature within the Alma Industrial Estate which is designated a Locally Significant Industrial Site.
- 4.6. The site is bounded to the west, north and east by Durants Park which constitutes Metropolitan Open Land (MOL). Durants Park is also a non-designated heritage asset as it has Local Listing status due to its archaeological interest. However, neither the estate nor Durants Park are designated as Archaeological Priority Areas (APA). APAs close to the site are both the Durrants Road and Green Street APAs.
- 4.7. St James' Church, located approximately 640m northwest of the estate is a Grade II Listed Building and is located north of the Hertford Road Cemetery, which has Local Listing status, fronting Hertford Road. Green Street, located approximately 350m north of the application site, benefits from several listed buildings, with no.98 and 100 and the White Horse Public House being Grade II Listed.
- 4.8. The site is identified within the adopted North-East Enfield Area Action Plan as within the Ponders End Regeneration/Place Shaping Priority Area and lies within the wider North East Enfield Strategic Growth Area.

4.9. The centre of the site has a PTAL rating of 2 indicating that it has a relatively poor level of connectivity to public transport. The closest bus stops to the site are on Alexandra Road and Green Street, both of which are located approximately 580m from the estate. Bus stops on Nags Head Road are approximately 635m from the estate and bus stops on Hertford Road are approximately 765m from the estate. Brimsdown Train Station is the closest train station to the estate and is located approximately 930m north-east of the estate. Southbury London Overground Station is located approximately 1.3km south-west of the site.

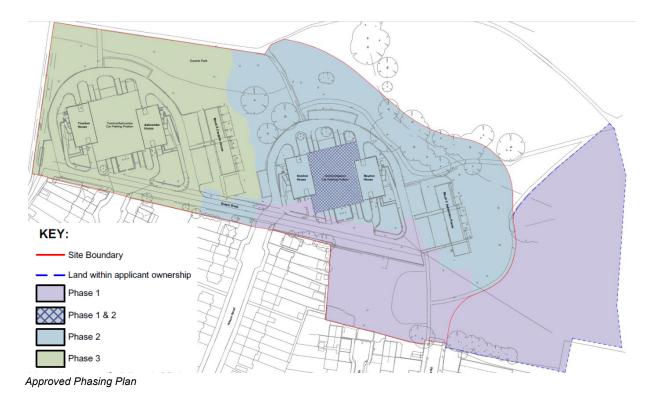
# 5. Proposal

5.1. Planning permission was granted on 22.12.22 for:

Detailed planning application for the construction of two buildings comprising 46 residential dwellings (Use Class C3) along with associated road layout, means of access and highways works; car and cycle parking; hard and soft landscaping; play; public, communal and private realm; ancillary plant and structures; and other works and improvements including works to the existing parking podium located between Honiton House and Newton House (Phase 1); and

Outline planning application (with matters relating to appearance and landscaping reserved) for the refurbishment and extension of Crediton House and Ashburton House and construction of two development blocks along Exeter Road comprising up to 83 residential dwellings (Use Class C3) with associated means of access; car and cycle parking; hard and soft landscaping; play; public, communal and private realm; highways works; and other associated works and improvements, including works to existing parking podiums and landscape enhancement works to Durants Park (Phases 2 & 3).

5.2. The hybrid approach to the planning application reflects the phased nature of the development proposed. See below an exert illustrating the approach to site-wide phasing:



5.3. The below image shows the approved Masterplan layout. Blocks A&B are new buildings within Phase 1 and have been granted full planning permission through the hybrid application. Blocks C&E are part-new build, part extension and refurbishment of the existing Crediton (Block E) and Ashburton Houses (Block C). Blocks D&F are new buildings south of the respective existing podium structures, located north of Exeter Road. The outline permission has already approved the layout and scale of these blocks/extensions and what is under consideration through this application is the appearance of these buildings, together with details of the internal floor layouts to demonstrate compliance with residential quality standards:



Masterplan Layout inclusive of Block Numbers

- 5.4. The hybrid application approved a Design Code which sets out design principles and associated guidance on both site-wide design principles, but also detailed requirements surrounding layout, access, landscaping, technical strategies and design principles on specific blocks within phases 2 and 3. The Design Code acts as the mechanism to bring about site-wide design cohesion, noting Phase 1 was granted full planning permission, and is a document against which this application must be assessed.
- 5.5. The hybrid application also approved a set of parameter plans, which set parameters required to be adhered to, including building footprint and heights, as well as spatially setting out the approach to site-wide open space and landscaping.
- 5.6. Below is a summary of the content of development within Phases 2&3 cumulatively:

Phase	Summary
Phase 2&3 (Cumulatively)	Number of new homes – 83
	Unit mix proposed (Phase 2) (44 units):  • 1b/2p – 12  • 2b/3p - 6  • 2b/4p – 6
	<ul><li>3b/5p – 14</li><li>4b/7p - 6</li></ul>
	Unit mix proposed (Phase 3) (39 units):
	• 1b/2p – 8
	• 2b/4p − 8

- 3b/5p 13
- 3p/6p − 1
- 4b/7p 9

# Building height (Phase 2):

- Ashburton House Part 8 part 6 part 9 storeys (29.85 at highest point maximum parameter)
- Podium dwellings 3 storeys (9.82m)

# Building height (Phase 3):

- Crediton House Part 7 part 6 part 9 storeys (29.85m at highest point maximum parameter)
- Podium dwellings 3 storeys
   (9.82m below parapet)

External upgrades to Ashburton and Crediton House involving new windows and creation of formal garden spaces for some ground floor maisonettes.

Vehicular parking – 53

Cycle parking – 234 spaces inclusive of 9 larger spaces for disabled cycle parking

Upgrades to both podium car parks including new rooftop green roofs. Upgrades to podium vehicular access arrangements from Exeter Road to both upper and lower level.

Public Realm – 13,238sqm of new public realm

New play space – 1907sqm

Site wide landscaping enhancements including new footpaths, trees and soft/hard landscaping

5.7 Ashburton House (Block C) and Crediton House (Block E) include the retention of the existing buildings with lateral and horizontal extensions to the northern and southern edges. The approved Design Code sets out that both buildings mush share the same architectural language, scale, mass and appearance. Both blocks use the same palette of materials including a light and a dark brick, metal cladding and ventilations panels, and balconies with railings.

- 5.8 The design of the new 'ends' take Exeter Road as the defining line between the more suburban character to the south and the taller housing to the north. The park façade of the northern extension echoes the elevational approach of the existing tower blocks and will feature the typical consistent balcony and window arrangements.
- 5.9 Two types of balconies are included in the proposal: solid brick parapet balconies at the lower levels to increase privacy and partially open balconies above using a combination of metal balusters and perforated panels to increase views and natural lighting. The proposed extensions are also characterised by large vertical windows with metal ventilation panels. All windows to existing dwellings will be replaced to match the proposed windows, whilst the window size will remain the same as existing.
- 5.10 The new maisonette rooftop extensions on the existing buildings will be metal clad in a colour complementary to the brick and metal details in the design. The maisonettes are supported on brick columns which will follow the party wall lines of the existing building.
- 5.11 The three storey terraced houses proposed for Block D and Block F along Exeter Road will mirror the suburban housing beyond the southern boundary of the Site. The houses will use the same light brick as on Ashburton House and Crediton House and will feature metal fenestration and ventilation panels. The windows are stacked, and the ventilation panels create a cohesive and geometric elevation. The front doors facing Exeter Road will be in a complementary colour and will be confirmed at a later stage.
- 5.12 The existing homes in Ashburton House and Crediton House will be improved by replacing the windows, doors and cladding to improve insulation which will benefit the energy efficiency of the existing flats. In addition, private front gardens are proposed for the existing lower-level maisonettes. The existing main entrances in both blocks will also be upgraded with new fob-accessed main entrance doors and brick walls protruding the existing structure.
- 5.13 With respect to landscaping, the proposals comprise extensive new planting along the northern boundary including 11 large canopy trees to create long term improvements to the park boundary condition. New planting and soft landscaping is also proposed between the existing and proposed blocks. Further, the landscape strategy includes the provision 57 trees in Phase 1 and 99 trees in Phases 2 and 3 totalling 156 trees across all Phases.
- 5.14 The proposals include a reduction in the number of large formal paths through the site to increase privacy to ground floor unis and a network of additional secondary and tertiary paths will be introduced to connect the play areas as a play trail throughout the site, and to integrate nature play around the parkland edge. New streetlighting will be provided across the site and the parkland edge to increase safety.
- 5.15 The Proposed Development will provide 1,907sqm of play areas across the Phase 2 and 3 Site. The proposed play areas have been laid out as a continuous play trail along the northern edge of Durants Park. Play targeted for ages 0-11 will be located in the eastern and western edges of the play trail. Additional play equipment for children up to 15 years of age will be positioned throughout the landscape corridor, which will also include some skate park elements following feedback received during public consultation with residents on the type of play spaces to be included in the detailed design for Phases 2 and 3.

5.16 The initial proposals for the existing podium roofs between Tiverton House and Ashcombe House and Honiton House and Newton House to provide communal amenity and play space, as set out in the Design Code, have been omitted following feedback from residents during consultation and for reasons concerning accessibility. The amenity uses previously proposed on the podiums will be re-provided at grade to be more accessible to residents along with additional picnic benches added to the park edge areas, to create resting opportunities as well as overlooking for the play areas for parents to use. These changes are reflected in a revised Design Code and Parameter Plan (3665A-LB-OO-DR-A-206-Site Wide Open Space Parameter Plan), which has been the subject of a separate Non-Material Amendment (NMA) application.

# 6. Relevant Planning Decisions

- 6.1. 21/04792/NMA Non-material minor amendment application (Section 96a) to planning permission 21/02076/OUT to amend conditions F05 and O04 (Compliance with Plans), O06 (Compliance with Design Code), O07 (Target Dwelling Mix) and O43 (Final Sustainable Drainage Strategy), to remove conditions 010 (Delivery of Podium Level Amenity Space), F38 and O33 (Podium Use) in order to relocate roof-level communal amenity space on existing podium structures, omit relocation of ground floor unit entrances affecting existing ground floor units of Ashburton and Crediton Houses (Blocks C&E), omit second floor balconies affecting existing units of Crediton and Ashburton Houses (Blocks C&E), amend target unit mix owing to tenure changes / unit sizes to 2no. units, construct ground-level plant structures and update the drawing schedule which included incorrect drawing references Granted
- 6.2. 21/02076/OUT Hybrid planning application (part detailed /part outline) for the comprehensive redevelopment of the Exeter Road Estate for up to 129 additional residential dwellings (Use Class C3) and associated works comprising:

Detailed planning application for the construction of two buildings comprising 46 residential dwellings (Use Class C3) along with associated road layout, means of access and highways works; car and cycle parking; hard and soft landscaping; play; public, communal and private realm; ancillary plant and structures; and other works and improvements including works to the existing parking podium located between Honiton House and Newton House (Phase 1) and

Outline planning application (with matters relating to appearance and landscaping reserved) for the refurbishment and extension of Crediton House and Ashburton House and construction of two development blocks along Exeter Road comprising up to 83 residential dwellings (Use Class C3) with associated means of access; car and cycle parking; hard and soft landscaping; play; public, communal and private realm; highways works; and other associated works and improvements, including works to existing parking podiums and landscape enhancement works to Durants Park (Phases 2 & 3) – Granted 22.12.2021

6.3. See below additional specific information approved through application 21/02076/OUT across both the Detailed (Phase 1) and Outline (Phases 2&3) applications:

Phase	Application	Summary
Phase 1	Detailed	Number of new homes – 46
Phase 1	Detailed	Number of new homes – 46  Unit mix proposed:  • 1b/2p – 23  • 2b/4p – 7  • 3b/5p – 16  Building heights (at highest point):  • Block A – Part 3 part 4 storeys (13.2m)  • Block B – Part 5 part 7 storeys (22.9m)  Vehicular parking – 179  Cycle parking – 87 spaces inclusive of 4 larger spaces for disabled cycle parking  Upgrades to the upper level of the eastern podium
		cark park (between Honiton and Newton House) inclusive of new vehicular access  Public realm – 3,514sqm of new public realm  New play space – 572sqm  Landscape enhancements to Durants Park including new footpaths, trees and soft landscaping inclusive of the delivery of the new wetlands scheme.
Phase 2 and 3	Outline	Number of new homes – 83  Unit mix proposed (Phase 2):  • 1b/2p – 12  • 2b/3p – 6  • 2b/4p – 6  • 3b/5p – 14  • 4b/7p - 6  Unit mix proposed (Phase 3):  • 1b/2p – 8  • 2b/4p – 8  • 3b/5p – 13  • 4b/7p - 10  Building height (Phase 2):  • Ashburton House – Part 8 part 6 part 9 storeys (29.85 at highest point maximum parameter)  • Podium dwellings – 3 storeys (9.82m)

Building height (Phase 3):

- Crediton House Part 7 part 6 part 9 storeys (29.85m at highest point maximum parameter)
- Podium dwellings 3 storeys (9.82m below parapet)

Vehicular parking – 53

Cycle parking – 234 spaces inclusive of 9 larger spaces for disabled cycle parking

Upgrades to both podium car parks including new green roofs. Upgrades to podium access arrangements from Exeter Road to both upper and lower level.

Public Realm – 13,238sqm of new public realm

New play space – 1300sqm (Phase 2), 584sqm (Phase 3)

Site wide landscaping enhancements including new footpaths, trees and soft landscaping

6.4. 20/03211/RE4 - Durants Park flood alleviation scheme involving diversion of water flow from existing surface water sewer to new wetland area in south-eastern corner of the park; excavation works to create wetland basins, retention of resultant spoil on site to create raised wildflower meadows to north of the wetlands together with provision of footpath and amenity area – Granted 24.02.2021

### 7. Consultations

#### 7.1. Pre-Application Consultation

7.2. The below table is an exert from the Statement of Community Involvement submitted in support of this application (HTA, dated December 2021). The table sets out the timeline of the community consultation exercises in advance of the submission of this application.

Project Timeline	
Month	Activities
October 2021	Newsletter, questionnaire, and feedback form sent to residents on the estate and the surrounding area
	Online Public Exhibition (Ashburton and Crediton Houses) (20.10.21)
	Online Public Exhibition (Honiton, Newton, Ashcombe, and Tiverton Houses) (21.10.21)
November 2021	Newsletter and feedback form sent to residents on the estate and the surrounding area for 04.11.21 event
	Public Notice Board Exhibition (04.11.21)
	Newsletter and feedback form sent to residents on the estate and the surrounding area for 02.12.21 event.
December 2021	Public Notice Board Exhibition (02.12.21)
	Submission of planning application

- 7.3. Regards the 2no. online public exhibition events, cumulatively 2no. residents attended. 19no. residents attended the 2no. in person public consultation event and 13no. written letters of feedback were received.
- 7.4. The applicant has set out that in general, there was a significant level of support for the proposals as a whole, and for the information presented on the appearance and landscape of the Phases 2 and 3 blocks. A number of comments were made reiterating the need for renewal of the wider area and the estate, the principle for which was established through the hybrid planning permission along with the parameters and design code principles for Phases 2 and 3.
- 7.5. The following commentary provides a high-level summary of the feedback from public consultation.
  - Residents were strongly supportive of the landscape strategy, including the new play space (more so once the spaces were moved further away from homes in Crediton House), greening, potential for greater biodiversity, and the principle of having more useable open space for residents. Amongst this, a few residents reiterated the need for a robust management strategy for these spaces and facilities. The use of the podia as a green roof instead of amenity space was supported by residents within Honiton, Newton, Ashcombe and Tiverton Houses. It was mentioned repeatedly that they wanted to live amongst a more green and biodiverse environment without the potential for impacts on residential amenity if the spaces were accessible (i.e. from noise or lights, despite assurances that the spaces could be designed in such a way, and managed by the Council, to minimise such impacts).
  - There was support for the appearance of the buildings, with the general consensus being that they responded well to the existing blocks in design terms, and were subservient to them. Responses also included questions and

concerns about car parking, construction impacts, anti-social behaviour, impacts on views, and impacts on residential amenity (including overlooking, loss of light, and noise).

# Enfield Place and Design Quality Panel (DRP):

7.6. The proposed development was brought before the Enfield Place and Design Quality Panel (hereby referred to as DRP) twice at different points within preapplication discussions in advance of the submission of the hybrid application. The majority of points raised at both sittings relating to high-level design principles, which were relevant to the hybrid application. Nonetheless, on the basis that matters of appearance and landscaping were reserved; and more detail has come forward in support of this application for reserved matters, officers felt it useful to reiterate the small number of relevant points raised, and provide an update, as the detailed design development has come forward.

# 26.03.20 DRP sitting:

- 7.7. "The boundary with Durants Park on to which the site fronts is undefined and underutilised. Proposals should be developed on the park-facing aspects of the site on its northern boundary with housing and public realm that activate the ground floor and connect the new residential district with the park".
- 7.8. Officer comment: The officer report supporting the hybrid application set out that earlier, pre-application iterations of the site-wide development involved new housing north of the existing podium structures however this has not come forward due to viability reasons. The officer report also set out that the Site Wide Illustrative Landscaping Plan, set-out high-level landscaping detail in the north part of the site; contributing to activating the north of the site. Landscaping was a matter reserved and the detailed approach to landscaping (inclusive of planting schedules and species), the design and layout of play, forms part of this reserved matters application and is assessed in the body of this report. Officers are satisfied that the applicant has satisfactorily addressed this comment, particularly through intensifying the provision of formal play to the northern part of the site.

# 14.01.21 DRP sitting:

- 7.9. "A degree of simplification and consistency across the proposals could assist in improving the quality of the built project".
- 7.10. Officers are satisfied that the scheme proposed under this application has strong design cohesion with Phase 1 of the development; which was granted full planning permission through the hybrid permission. This consistency has been achieved by agreeing design principles in the approved design code and other relevant plans approved through the hybrid scheme. Relevant conditions are attached to the hybrid scheme, and will be attached to this reserved matters application, to best safeguard the design, through to delivery.
- 7.11. "The landscape principles are also supported (improved Exeter Road, new square and Green links) but these aspirations are not yet being realised in the detailed proposals".

- 7.12. Sections 2 (Layout) and 4 (Landscaping) of the approved Design Code, set out design principles to be adhered to in the detailed design of Phases 2&3 regards character areas throughout the site, planting and street design. To reiterate, an Illustrative Landscaping Masterplan was also submitted in support of the hybrid application. Noting landscaping was a reserved matter, it would be expected that the majority of relevant detail would come forward within this reserved matters application; which it has. Section 7 of the submitted Design and Access Statement (DAS) in support of this reserved matters application sets out the detailed landscaping approach across Phases 2&3. The DAS sets out the detailed design approach to each "character area" of the site, as identified within section 4.01 of the approved Design Code. Within the DAS, the applicant highlights through precedent images, 3D imagery as well as sections, the landscaping approach to each character area inclusive of SuDS features where relevant.
- 7.13. This application is also supported by detailed plans covering the entirety of Phases 2&3. These set-out in detail, the planting species schedules, details around hard landscaping materials in all public areas of the site including areas of play, as well as details of the 2no. podium roof level green roofs.
- 7.14. "Further clarity is needed on boundary treatments, bike storage and providing greater emphasis on the entrances to residential blocks at street level would help deliver greater clarity to the layout".
- 7.15. In support of this reserved matters application, the applicant has submitted Landscaping Typical Details plans which specifically relate to boundary treatments on all buildings typologies across Phases 2&3. Section 4.11 of the approved Design Code also sets out the design principles to be adhered to regards boundary treatments/methods of enclosure.

# 7.16. Public consultation

- 7.17. Public consultation as a result of this planning application involved notification letters being sent to 693 neighbouring properties (both within the estate and homes adjoining) on 14<sup>th</sup> January 2022, a press advert in the Enfield Independent was published 19<sup>th</sup> January 2022 and 5no. site notices were erected 20<sup>th</sup> January 2022.
- 7.18. As a result of public consultation, <u>two</u> objections were received, and a summary of reasons for comment is below:
  - General dislike of proposal;
  - Increase of pollution;
  - Removal of greenery to area, of which is already lacking;
  - Adverse impacts to sunlight conditions by reason of construction of buildings in the east-part of estate;
  - Increase in noise;
  - Design, related to massing of the proposed southern elevation of the new southern addition to Crediton House;

- Increase in different modes of traffic on the east-west Exeter Road estate road, and implications thereby on highways safety; and
- Adverse impact of introduction of car-parking on the south-side of Exeter Road inclusive of concern regards damage to neighbouring private fences south of.
- 7.19. Officer Response
- 7.20. "Increase of pollution"
- 7.21. The principle of this form, quantum and scale of development has been approved through the hybrid application. This was supported by an Air Quality Assessment and conditions of the planning permission (F37 and O45) require the applicant to demonstrate that each phase meets the requirements of relevant policy.
- 7.22. "Removal of greenery to area, of which is already lacking"
- 7.23. The principle of this form, quantum and scale of development has been approved through the hybrid application This was accompanied by a landscape strategy document setting the approach to the repurposing of open space and public realm in the context of the new development, together with the approach to landscaping. This application sets out the detailed design proposals around Open Space, Landscape, Play, Biodiversity and Trees across phases 2&3 and are discussed further within the body of this report.
- 7.24. "Adverse impacts to sunlight conditions by reason of construction of buildings in the east-part of estate"
- 7.25. The principle of this form, quantum and scale of development has been approved through the hybrid application. This was accompanied by a Daylight & Sunlight (Neighbouring) Study for both the Outline and Full elements of the development; site-wide across all phases. Testing undertaken included the maximum height and massing of all development within Phases 2&3 Thus the impact of all development to which this reserved matters application relates on all relevant affected neighbouring residential units, both within the existing estate and south of it, has already been assessed and considered acceptable and hence planning permission was granted. The scope of daylight/sunlight testing in the context of this application for reserved maters, relates solely to the testing of the performance of the new dwellings, for which detailed design is submitted, this being Blocks, C, D, E & F.
- 7.26. "Increase in noise"
- 7.27. The planning permission granted secures through conditions, the requirement for the applicant to submit Acoustic Reports related to all combined mechanical plant for all phases (conditions F7 and O30), Construction Management Plans (conditions F25 and O26) and a Construction Logistics Plans (conditions F26 and O27).
- 7.28. Design, related to massing of the proposed southern elevation of the new southern addition to Crediton House"

- 7.29. The height, massing and footprint of the proposed south extension to Crediton House has been approved through the hybrid application. This application is considering only the appearance of this building. The design rationale and officer assessment of design is set out within the body of this report.
- 7.30. "Increase in different modes of traffic on the east-west Exeter Road estate road, and implications thereby on highways safety"
- 7.31. The principle of this form, quantum and scale of development has been approved through the hybrid application and the traffic impact of this quantum found to be acceptable
- 7.32. "Adverse impact of introduction of car-parking on the south-side of Exeter Road inclusive of concern regards damage to neighbouring private fences south of"
- 7.33. The layout of the development and the quantum and location of car parking has been approved through the hybrid application and found to be acceptable.
- 7.34. Statutory and Non-Statutory Consultees
- 7.35. <u>Environmental Health:</u> State no objection as there is unlikely to be a negative environmental impact; subject to appropriate conditions.
- 7.36. Officer comment: On further engagement with the Council Environmental Protection Officer, officers are satisfied that the extant condition schedule secured through the hybrid permission, captures all conditions the Officer requests.
- 7.37. <u>Transportation:</u> Stated no additional comment noting comments made in regards to the hybrid application and the secured extant condition schedule(s)
- 7.38. <u>SuDS Highways:</u> Stated no additional comment noting comments made in regards to the hybrid application and the secured extant condition schedule(s)
- 7.39. <u>Planning Policy:</u> It is not considered that there are any planning policy concerns in relation to the proposed scheme. The planning policy team is fully supportive of the reserved matters application.
- 7.40. <u>Thames Water:</u> Stated no additional comment noting comments made in regards to hybrid application and the t secured extant condition schedule(s)
- 7.41. <u>Natural England:</u> State no objection on basis of mitigation secured through hybrid permission.
- 7.42. Officer comment: Natural England stated that all (relevant) applications, in line with interim Natural England Guidance, should be accompanied by an appropriate assessment. A full Habitats Regulations Assessment (HRA), was submitted with the approved hybrid application within which, it set-out forms of mitigation that are secured through the hybrid permission. At the request of Natural England, during the course of this reserved matters application, the applicant submitted an update

note setting out, that all mitigation agreed, is secured through the extant hybrid permission. Natural England state no objection to this application

7.43. MPS Designing Out Crime: Stated no additional comment noting comments made in regards to the hybrid application and the secured extant condition schedule(s)

# 8. Relevant Policy

- 8.1. National Planning Policy Framework 2021
- 8.2. The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:
  - "(c) approving development proposals that accord with an up-to date development plan without delay; or
  - (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (7), granting permission unless:
  - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (6); or
  - 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.
- 8.3. Footnote (8) referenced here advises "This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites ( with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years."
- 8.4. 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.
- 8.5. 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.
- 8.6. 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.

- 8.7. In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the "presumption in favour of sustainable development" category.
- 8.8. This is referred to as the "tilted balance" and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

# 8.9. The London Plan 2021

GG1 - Building Strong and Inclusive Communities

GG2 - Making the Best Use of Land

GG3 - Creating a Healthy City

GG4 – Delivering the Homes Londoners Need

D3 – Optimising Site Capacity through the Design-Led Approach

D4 – Delivering Good Design

D5 – Inclusive Design

D6 - Housing Quality and Standards

D7 - Accessible Housing

D8 - Public Realm

D11 – Safety, Security and Resilience to Emergency

D12 - Fire Safety

D14 - Noise

S4 – Play and Informal Recreation

HC1 – Heritage Conservation and Growth

G1 – Green Infrastructure

G3 – Metropolitan Open Land

G4 - Open Space

G5 - Urban Greening

G6 - Biodiversity and Access to Nature

G7 – Trees and Woodland

SI2 – Minimising Greenhouse Gas Emissions

SI4 – Managing Heat Risk

SI7 – Reducing Waste and Supporting the Circular Economy

T1 – Strategic Approach to Transport

T2 – Healthy Streets

T5 – Cycling

T6 – Car Parking

T6.1 - Residential Parking

# 8.10. <u>Mayoral Supplementary Guidance</u>

### 8.11. Play and Informal Recreation (September 2012)

Provides guidance to Local Authorities and Developers to estimate the potential child yield from a development, and the resulting requirements for play space provision.

# 8.12. Sustainable Design and Construction (April 2014)

The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.

# 8.13. Accessible London: Achieving an Inclusive Environment (October 2014) The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.

# 8.14. Housing (March 2016)

The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.

# 8.15. Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration

Sets out the Mayor's policies for Estate Regeneration.

# 8.16. Local Plan – Core Strategy

Core Policy 4 – Housing quality

Core Policy 9 – Supporting Community Cohesion

Core Policy 20 – Sustainable Energy use and energy infrastructure

Core Policy 25 – Pedestrians and cyclists

Core Policy 30 – Maintaining and improving the quality of the built and open environment

Core Policy 31 – Built and landscape heritage

Core Policy 40 - North East Enfield

#### <u>Local Plan – Development Management Document</u>

DMD6 – Residential Character

DMD8 – General Standards for New Residential Development

DMD9 - Amenity Space

DMD10 – Distancing

DMD 37 – Achieving High Quality and Design-Led Development

DMD 38 - Design Process

DMD44 – Conserving and Enhancing Heritage Assets

DMD45 - Parking Standards and Layout

DMD47 - New Road, Access and Servicing

DMD49 – Sustainable Design and Construction Statements

DMD51 - Energy Efficiency Standards

DMD53 – Flow and Zero Carbon Technology

DMD55 - Use of Roofspace/ Vertical Surfaces

DMD56 – Heating and Cooling

DMD69 – Light Pollution

DMD 73 - Child Play Space

DMD 78 – Nature conservation

DMD79 - Ecological Enhancements

DMD80 – Trees on development sites

DMD81 – Landscaping

#### Other Material Considerations

National Planning Practice Guidance S106 SPD (2016) Enfield Characterisation Study (2011) Manual for Streets 1 & 2, Inclusive Mobility 2005 (DfT) Enfield Blue and Green Strategy (2021 -2031) Natural England Interim Guidance (2019)

# 8.17. Enfield Local Plan (Reg 18) 2021

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

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

Strategic Policy SPBG3 - Biodiversity net gain, rewilding and offsetting

Strategic Policy SP BG4 - Green belt and metropolitan open land

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 DE11 - Landscape design

Policy DM DE13 - Housing standards and design

# 9. Analysis

9.1. Outline planning permission has been granted for the development of this stie to provide 129no. units and associated works. The outline permission has established a number of key principles for the site with regards to housing quantum, unit mix and tenure and the scale and footprint of buildings and general masterplan layout. This is a reserved matters application pursuant to the outline permission and relates only to the appearance of Blocks C, D, E & F, the existing podium structures and the detailing on the landscaping and public realm proposals around these blocks, set

within the context of the agreed principles. The main issues to consider are as follows

- Design
- Residential Design Standards
- Impact to Residential Amenity
- Open Space, Landscape, Play, Biodiversity and Trees
- Sustainability and Climate Change
- Flood Risk and Drainage
- Contamination
- Impact on Heritage Assets

## Design

- 9.2. London Plan Policy D3 outlines all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged.
- 9.3. London Plan Policy D9 requires the architectural quality and materials of tall buildings to be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan
- 9.4. Core Policy 30 requires all developments and interventions in the public realm to be high-quality and design-led. The DMD contains a number of specific policies seeking to influence design quality in terms of density, amenity space provision, distancing standards, daylight and sunlight and appropriate access to parking and refuse facilities.

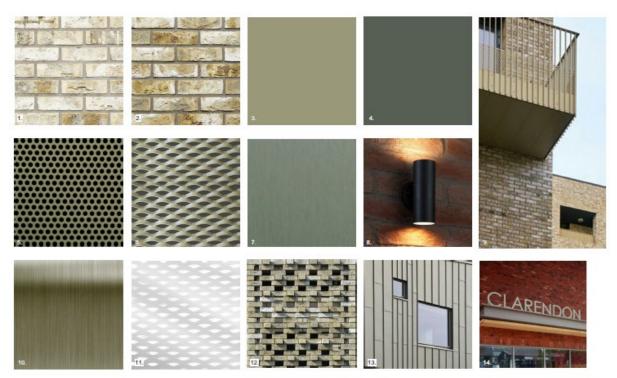
#### Height and Massing

9.5. The maximum acceptable height parameters throughout Phases 2&3 were established through the outline permission. All new-build elements covered by this application fall within these maximum height parameters.

#### Architecture and Materials

- 9.6. The outline application secured a Design Code, to be adhered to when developing the detailed designs coming forward within this reserved matters application. Section 2.13 of the Code sets out design principles and guidance related to materials. Section 2.11 sets out principles around active frontages. Dedicated sections within the Code relate to development affecting Crediton and Ashburton Houses (Blocks C&E) as well as the new-build "podium dwellings" (Blocks D&F). These sections set-out principles ranging from architectural language, design cohesion across phases and detailed design matters such as the elevation composition promoting different elements across their "base", "mid-sections" and "tops".
- 9.7. Section 6 (Appearance) of the Design and Access Statement (DAS) supporting this application compliments the approved Design Code and sets out in detail, the architectural approach to the detailed design of Phases 2&3 inclusive of façade strategies, material treatments and architectural detailing.

9.8. Along with detailed elevation plans, this application is supported by a Phase 2&3 Materials Palette Plan (dwg. no. 3665D-LB-ZZ-DO-A-419000 Rev. P1 (see below exert) which would form an approved drawing. This provides primarily precedent photographs of materials proposed to be utilised and includes a detailed materials schedule, the applicant has submitted a series of illustrative views in support of this application.



Materials Palette Plan exert



Illustrative view looking west with Block C (Ashburton) and Block B (with Phase 1)



Illustrative view looking east on Exeter Road with Blocks F& E (foreground), and D&C (background)

9.9. The scheme responds positively to its context through a primarily brick elevational approach, fine detailing and simple metalwork. The buildings sit comfortably alongside the existing estate and Phase 1 of the development; as granted Full Planning Permission through application 21/02076/OUT. The scheme is in compliance with the approved Design Code. However, conditions are recommended requiring further details for example of brick reveal depths, together with sample materials and brick panels being made available on-site and agreed prior to any super-structure works commencing to ensure the same detail and quality is secured across Phases 2 and 3, as per Phase 1.

# Podium Elevational Design and Access

- 9.10. As existing, the podium structures have vehicular access from the north and south elevations (4no. accesses in total as existing). Vehicular access to the upper-deck of the eastern podium was approved through the hybrid application with high-level detail for the remaining three decks submitted with this application; reflecting that as approved under the hybrid scheme.
- 9.11. The proposed approach to façade remediation following the relocation of the existing vehicular entrances will result in more open north-south facades on both structures, in comparison to the existing situation with much of the existing brick façade being replaced with metal railings and perforated panelling. The approach to materials, particularly the use of metal panelling (RAL colour shown on plans), matches closely architectural detailing on Blocks C&E. The proposed façade approach promotes a sense of cohesion across the entire estate and is supported by officers. Nonetheless, officers recommend a condition requiring full north-south elevation plans to ensure the design vision and rationale is secured..

## Inclusive Design

9.12. Policy D5 (Inclusive Design) of the London Plan outlines that development proposals should achieve the highest standards of accessible and inclusive design outlining a set criterion for adherence to.

- 9.13. London Plan Policy D7 (Accessible Housing) requires 90% of units to meet M4 (2) (accessible and adaptable) and 10% to meet M4 (3) wheelchair standards.
- 9.14. This application is supported by an Access and Inclusivity Statement. The statement confirms compliance with the relevant policy framework by reason of the proposed housing and tenure mix, how the landscape design approach is influenced by promoting people focused spaces and how the development overall is designed in a way to maximise the principles of barrier-free development.
- 9.15. However, officers did identify potential access constraints within the existing buildings from the existing residential lift cores along an internal corridor leading to the podium car parks where there exist pinch-points (800mm) within the existing corridor. This limits usability of the corridor and thus access to the podium car parks. The preference would be for a change to be made to the building to accommodate a more generous corridor (1200mm wide). However, it is appreciated that this is an existing situation and the applicant has advised through undertaking some investigative works, that it is not possible for financial viability reasons and given the complexity of the existing building structures. Given this, no accessible parking bays are to be accommodated within the podium decks and instead these will be provided on-street.
- 9.16. All new dwellings and external access footpaths are designed to meet Building Regulations M4(2) requirements with level access provided either by street-level or by an 8 or 13 person lift. There are 8no. units classified M4(3). These are all located within the southern extension to Block C (Ashburton); with 1no. per floor from ground floor to level 7.
- 9.17. The application is accompanied by an appropriate Fire Statement which is assessed within the relevant section of this report.

# Wind Assessment

9.18. The hybrid application approved a Pedestrian Level Wind Desk-Based Assessment which tested wind conditions based on the proposed site-wide design parameters, across all phases. The results demonstrated, east of Ashburton and Crediton Houses (Blocks C&E), that within summer months the space around the base of these buildings would only be suitable for "standing" purposes. It should be noted that the applicant proposes formalising these spaces at these locations as gardens for existing ground floor maisonettes; with detail coming forward as part of this reserved matters application. The applicant has confirmed that these spaces were not tested with any means of enclosure in place, which would reduce and mitigate any wind impacts. Officers are satisfied that this form of mitigation is appropriate and will improve the microclimate around the base of these buildings.

# Fire Safety

9.19. London Plan Policy D 12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.

- 9.20. This application is submitted with a Fire Safety Statement. Section 3 of the statement sets out in detail, matters around means of escape inclusive of those with reduced mobility. Section 4 of the report, outlines means of warning and section 5 outlines details surrounding fire spread control. Access facilities for the fire service and fire safety management and maintenance details are also outlined in detail.
- 9.21. The London Fire Brigade were consulted on this application and have stated no comment.
- 9.22. It is recommended a condition be attached to the planning permission requiring compliance with the submitted Fire Strategy, in accordance with London Plan Policy D12.

#### Secure by Design

- 9.23. The scheme has utilised both active and passive measures to "design out crime" across the masterplan. Principles of best practise of secure by design are evident within the proposed scheme, by way of the better activation of Exeter Road and activity at a ground floor level across the development. Landscaping design is to include a level and style of planting to promote good visibility. The design of communal spaces such as cycle and refuse stores have been designed appropriately to promote good visibility when entering/exiting. Further, the applicant outlines that lighting has been considered with secure by design principles in mind. The use of CCTV is proposed in key locations including car parks and fobbed entrances to cores is proposed.
- 9.24. The applicant has engaged with the Metropolitan Police Designing Out Crime Team and they were consulted and commented on this planning application. Officers have outlined that they fully support the scheme. The Outline Planning Permission condition O38 requires prior to the first occupation of each building within Phases 2 & 3, the applicant must submit details to the LPA demonstrating "Secured by Design" certification has been obtained for each building or part of each building across each phase.

#### Cycle Parking/Refuse Storage Updates

#### Cycle Parking

- 9.25. The approved outline application secured the site-wide cycle parking quantum and spatial distribution. Floorplans submitted for all blocks within Phases 2&3, to be approved under this application for reserved matters, follow the same strategy and achieve the agreed quantum regards cycle parking.
- 9.26. Refuse Facilities
- 9.27. Similarly to the above, floorplans submitted in pursuance of this reserved matters application function effectively with the site-wide refuse strategy agreed with the outline application.
- 9.28. The Council Commercial Waste Team were consulted and stated no comment.

## Residential Design Standards

- 9.29. London Plan Policy D6 sets out criteria for achieving good quality residential development. Minimum space standards are identified in Table 3.1 of the London Plan and detailed design guidance and principles are set out in the Mayor's Housing SPG (2016). Enfield's Development Management Document Policy 8 (General Standards for New Residential Development) seeks to ensure that residential developments are of the highest quality and relate well to their setting.
- 9.30. The DMD contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing).

### Space Standards

9.31. All housing units will meet or exceed the minimum internal space standards identified in the London Plan and respond to the design principles set out in the Mayor's Housing SPG (2016). All new residential units will have access to private balconies or terraces which meet or exceed the Mayor's housing space standards contained in the Housing SPG (2016) as well as communal amenity spaces and public realm.

#### Aspect

9.32. All new units across Phases 2&3 are at least dual aspect; with quite a few examples of triple aspect and even units with aspect on four sides; units with outlook on all four elevations being the east-most pair on each Blocks D & F fronting Exeter Road.

# Impact to Residential Amenity

- 9.33. The outline application approved a series of parameter plans which set design parameters across Phases 2&3. "Development Plot" parameter plans formed part of the approved drawings secured through the Outline Permission and set out maximum parameters for building footprints and heights across all new build blocks within Phases 2&3. The outline submission was also accompanied by illustrative floorplans across the majority of Phases 2&3 and the floorplans included in this submission reflect these. The detailed floorplans for Phase 1 approved under the hybrid, in tandem with illustrative floorplans for Phases 2 and 3 allowed a robust sitewide assessment of any overlooking to be undertaken at outline stage. It has been accepted through the granting of the outline planning permission that the relationship of the development to neighbouring properties is acceptable in this regard.
- 9.34. The hybrid application was also accompanied by a Daylight & Sunlight (Neighbouring) Study for both the Outline and Full elements of the development; sitewide across all phases. Testing undertaken included the maximum height and massing of all development within Phases 2&3, thus, the impact of all development to which this reserved matters application relates on all relevant affected neighbouring residential units; both within the existing estate and south of it, was understood and concluded acceptable in the assessment of the outline application. The scope of daylight/sunlight testing in the context of this application for reserved maters, relates solely to the testing of the performance of the new dwellings, for which detailed design is submitted, this being Blocks, C, D, E & F.

# <u>Overlooking</u>

9.35. The detailed floorplans submitted in support of this application affecting Phases 2&3, do not represent any significant departure from illustrative floorplans which supported

the outline application. Regards Block E, the layouts of units fronting Exeter Road were designed carefully to ensure no unacceptable overlooking impact south, toward Arbour Road. Balconies serving these units are orientated primarily off east and west elevations and living spaces are primarily focused with outlook toward these private amenity spaces. Officers conclude that the proposed development affords an acceptable level of privacy to future occupiers of the proposed units whilst adequately safeguarding the amenity of residents of neighbouring dwellings inclusive of existing residents on the site.

# Daylight and Sunlight

- 9.36. This application is accompanied by a Daylight and Sunlight Report . The applicant has tested all new units through the methodology of *Sunlight to Windows/Rooms* and *Sunlight to Amenities* and the *Average Daylight Factor (ADF)* test. Regards ADF testing, based on the room use, British Standard BS8206 gives the following recommendations:
  - Bedrooms 1% ADF;
  - Living Rooms 1.5% ADF; and
  - Kitchens 2% ADF.
- 9.37. Across all blocks (C, D, E & F), against the ADF testing, the development performs quite well. Across all blocks, 288no. of the 322no. rooms surpass the BRE recognised ADF targets. The majority of rooms that fall short of the relevant target for that room type, are kitchen/dining combination rooms. The majority of instances where the relevant target is not met, are very close to the relevant target.
- 9.38. As per sunlight to windows/rooms testing, of qualifying rooms across the 4no. blocks, 17no. of the 53no. total rooms fall short of recommended target values. However, some of these do meet the target for ADF. The results presented overall present a generally good situation for all units taking both testing results into consideration.
- 9.39. As stated, the testing across all 4no. blocks demonstrates that all units will have a generally good standard of daylight/sunlight. Results should also be read in the context of the quality of accommodation overall, which across the scheme is high given all units are at least dual aspect.
- 9.40. BRE guidance recognise that the numerical guidelines should be interpreted flexibly, in the context of aiming to ensure developments make optimal use of the site. The NPPF also states (Paragraph 125) that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.
- 9.41. On review of the results, and when balanced against the other policy objectives, the development will deliver a good standard of accommodation and is supported.

#### Open Space, Landscape, Play, Biodiversity and Trees

9.42. Chapter 8 of the London Plan – Green Infrastructure and the Natural Environment, has a number of policies setting out the London Plan's position on various matters ranging from the delivery of green infrastructure, to the requirements for new development, in their impacts to biodiversity, approach to drainage and open space and landscaping offer.

- 9.43. Policy G4 outlines that development proposals should where possible, create areas of publicly accessible open space, particularly in areas of deficiency.
- 9.44. Policy G5 outlines that major development proposals should contribute to the greening of London by including urban greening by incorporating measures such as high-quality landscaping, green roofs, green walls and nature based sustainable drainage. Emerging New Enfield Local Plan Policy BG8 outlines that new development will need to demonstrate how it will exceed the urban green factor targets set out in the London Plan. Policy G5 outlines that the Mayor recommends a target score of 0.4 for developments that are predominantly residential.
- 9.45. Policy G6 seeks to ensure development proposals manage impacts on biodiversity and aims to secure net biodiversity gain.
- 9.46. Policy G7 outlines that wherever possible, existing trees of value are retained and where trees are proposed to be removed, there should be an adequate replacement.
- 9.47. Policy S4, also of the London Plan, outlines that development proposals for schemes that are likely to be used by children and young people should, for residential development, incorporate good-quality accessible play provision for all ages. It outlines that at least 10sqm of play space should be provided per child. In addition, in 2019 the GLA introduced an updated play calculator against which applications should be assessed.
- 9.48. Core Strategy Policy 34 and 36 and Policies 71, 72, 73, 78, 79 and 80 of the Development Management Document sets out the Council's positions regards the protection and enhancement of open space, children's play space, ecological enhancements and the treatment of trees on development sites.

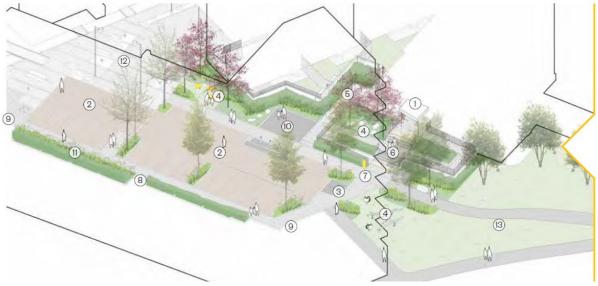
# Open Space and Landscaping

- 9.49. The hybrid application (21/02076/OUT) approved a Site Wide Open Space Parameter Plan (ref. 3665A-LB-MP-00-DR-A 206 Rev P1) which was subsequently updated by the S96a application (ref. 3665A-LB-MP-00-DR-A 206 Rev. P2). The amended parameter plan changed the location of formal play within Phases 2&3, with this being removed from the roof-levels of existing podium structures and relocated to ground level. The parameter plan highlights site-wide areas of play and parkland edge and the location of the landscape corridor. Sections 2 (Layout) and 4 (Landscaping) of the approved Design Code, set out design principles to be adhered to in the detailed design of Phases 2&3 regards character areas throughout the site, planting and street design.
- 9.50. Whilst not an approved plan, but rather submitted for illustrative purposes, an Illustrative Landscaping Masterplan was also submitted in support of the hybrid application. This plan primarily set out areas of planting and the schedule of hard-landscaping materials. A revised Illustrative Landscaping Masterplan (ref. 3665D-LB-MP-00-DR-L-200000 Rev. P1) is submitted with this reserved matters application, updated as a result of the site-wide re-distribution of play as approved by the S96a application (21/04792/NMA).
- 9.51. In support of this reserved matters application, the submitted Design and Access Statement (DAS) sets out the detailed landscaping approach across Phases 2&3; to which this reserved matters application relates. The DAS sets out the detailed design approach to each "character area" of the site, as identified within section 4.01 of the

approved Design Code. Within the DAS, the applicant highlights through precedent images, 3D imagery as well as sections, the landscaping approach to each character area inclusive of SuDS features where relevant. See below.



Landscape Courtyard (Crediton Courtyard) (Block E)



Landscape Courtyard (Ashburton Courtyard) (Block C)



Parkland Edge and Landscape Corridor



Exeter Road Character Area

Further to the above, this application is also supported by detailed planting plans covering the entirety of Phases 2&3. Plans submitted set-out in detail, the planting species schedules, details around hard landscaping materials in all public areas of the site including areas of play, as well as details of the 2no. podium roof level green roof. Landscaping Typical Details plans which set-out across all Blocks within Phases 2&3 are also submitted with this application; primarily details of enclosure and hard landscaping. In addition, Typical Details plans show detail of tree-pits for street trees.

- 9.53. The approved S96a application, as outlined, updated the approved Site Wide Open Space Parameter Plan to account for the post-determination requirement for the placement of 2no. plant-room outbuildings within Phases 2&3 of the development within landscaped areas. To ensure quality, officers recommend that a condition be secured to this reserved matters permission, to require the applicant to provide elevational detail of these 2no. outbuildings
- 9.54. Overall, it is positive to see a landscape led approach to identifying character areas, as it is the space between buildings which defines a place rather than just the facades. In general, the landscape proposals are of high quality and will do a good job of integrating the estate with Durants Park, by softening the edges of the park, increasing biodiversity and upgrading the routes into the park to make it easier for pedestrian and bike access. Downgrading of the existing service roads and removing car parking on the edge of the park is a positive move and is supported. This will activate this space as part of the park and provide more public amenity than is currently provided. The proposals will see extensive new tree planting thoughout,, which will enhance the estate for the benefit of existing and new residents.

# Play Provision

- 9.55. The approved hybrid Application secured a total provision play space being delivered on site through the development across all phases as 2456sqm which is split, with 572sqm being delivered within Phase 1 (London Plan requires at least 335sqm for Phase 1), 1300sqm in Phase 2 and the remaining 584sqm within Phase 3 (cumulative 1884sqm Phases 2&3).
- 9.56. The approved S96a application referenced above (21/04792/NMA) approved the relocation of play from podium roof-level to ground level. This increases the quantum play space overall from 1884sqm to 1907sqm.
- 9.57. Noting the good level of detail, inclusive of hard-surfacing detail, officers are satisfied with the quality and quantum of the play which the development secures.

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

9.58. As part of the hybrid application, the applicant submitted a full Habitats Regulations Assessment (HRA). Natural England confirmed that they agreed with the assessment conclusions, providing all mitigation measures outlined within the HRA were secured. The extant condition schedule and shadow S106 Agreement secure all agreed forms of mitigation as set out within the HRA and given this Natural England raise no objection.

#### Open Space, Landscape, Play, Biodiversity and Trees Conclusions

9.59. The submission reflects a robust and detailed approach to open space and landscaping, including play and tree planting which reflects closely, the requirements of the approved design code and the high-level information submitted in support of the outline application. The landscape strategy includes the provision of 57 new trees in Phase 1 and 99 new trees in Phases 2 and 3, totallin 156 trees across all phases. Planting plans submitted set-out clearly the location of planting across the whole site area (Phases 2&3) and the various landscaping plans provide detailed insight as to the detailed design approach to landscaping across all character areas; inclusive of details of hard landscaping which are also in accordance with the approved Design

Code. The conditions already secured through the Outline permission related to lighting and landscaping management remain extant and officers are supportive of the approach to landscaping overall.

# Sustainability and Climate Change

- 9.60. Paragraph 154 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. The London Plan and Enfield (Regulation 18) emerging Local Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.
- 9.61. London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan's requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme's performance.
- 9.62. London Plan Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 9.63. London Plan Policy SI 4 outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy.
- 9.64. NPPF Paragraph 157 outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable

#### Minimising Greenhouse Gas Emissions

- 9.65. An Energy and Overheating Assessment has been prepared which provides an overview of the energy and sustainability strategies for the proposed development. The document demonstrates how the proposal has sought to meet London Plan requirements inclusive of the energy hierarchy and relevant Council policies.
- 9.66. The assessment outlines that the development proposed has been designed to employ robust and high-performance passive design measures, utilises a highly insulting building fabric and a high-performance airtightness envelope, along with employing energy efficient infrastructure such as ventilation systems with heat recovery. The development utilises low-carbon heat pumps as a heat source along with integrating roof-level photovoltaic panels.

9.67. Appendix D of the Strategy outlines the regulated carbon dioxide savings across Phases 2&3 of the development and demonstrates target emission reduction from the baseline (Part L 2013) can be exceeded through the proposed energy efficiency measures and can achieve the 10% (be lean) and exceeds the 35% (be green) target, achieving 72% across both phases cumulatively. The approach to minimising greenhouse gas emissions reflects closely, the approach taken on Phase 1 of the development; secured through the Energy and Overheating Assessment approved by the Hybrid Application. To be consistent with actions taken on Phase 1 of the development, and to ensure the assessment's outlined reduction target are met, officers recommend a condition be attached to this Reserved Matters application requiring compliance with the Energy and Overheating Assessment, and prior to the occupation of Phases 2 & 3 of the development, evidence, inclusive of EPC certificates, to demonstrate compliance.

#### Overheating and Cooling Strategy

- 9.68. Supporting text to Policy SI 4 (paragraph 9.4.4) outlines that passive ventilation should be prioritised where appropriate and that where air conditioning systems including active cooling systems are unavoidable, these should be designed to reuse the waste heat they produce.
- 9.69. The energy and overheating strategy outlines that mechanical ventilation is to be utilised which incorporates air handling units with heat recovery. The approach involves a "boost" button which will provide occupants with the ability to ramp up the ventilation rates within their flat to increase ventilation.
- 9.70. It is also proposed that active cooling is integrated which is delivered through the proposed ASHP system. The primary justification for the use of active cooling relates to the applicant requiring the provision of window restrictors for safety reasons. The applicant has informed that all windows are to be restricted to 100mm max opening. This is also applicable to ground floor windows for the reason of security.
- 9.71. The applicant has tested a fully passive approach. However, has due to elevational design constraints and the requirement for window restrictors this could not be achieved. The overheating and cooling strategy closely reflects that as proposed to be utilised on Phase 1; as per the Energy and Overheating Assessment approved by the Hybrid Application (Max Fordham, dated 24.05.21). The justification is acknowledged and the approach proposed is accepted.

#### Flood Risk and drainage

9.72. The hybrid scheme approved a Flood Risk Assessment and Preliminary Drainage Strategy and the requirement for the submission of a final sustainable drainage strategy and separate verification reports were secured through conditions on both the full and outline condition schedules. The subsequent S96a application affecting the site updated condition O43 (Final Sustainable Drainage Strategy) in light of the 96a application approving changes to the site-wide distribution of green roofs. The hybrid permission secured detail which set out how the proposed development is to be served by a network of different SuDS elements as set out within the approved Flood Risk Assessment and Surface Water Drainage Strategy, Design Code and the Design and Access Statement supporting the hybrid scheme.

9.73. Further to the above, in support of this reserved matters application, the applicant has submitted an addendum to the Drainage Strategy (Conisbee, dated 08.12.21). The addendum provides additional insight as to SuDS features to be integrated into the landscaping strategy. Officers are satisfied that the relevant conditions secured through the outline permission require the applicant to provide this detail in full, in tandem with the required final sustainable drainage strategy.

#### Contamination

- 9.74. The outline condition schedule attached to the hybrid permission captured relevant details regards latter phases to come forward within the reserved matters application. Condition O16 (Contamination Investigation Report) part (a) requires any subsequent application to be accompanied by a Desk Study & Ground Investigation Report for each phase.
- 9.75. This application is supported by a Desk Study Report (GEA, December 2021). The study concluded that there is a low risk of any significant contaminant linkage at this site which would require any major remediation work. Section 5 of the report outlines that a separate Ground Investigation Report was being completed at the time of this application's submission. This was subsequently submitted to the LPA and the Council Environmental Protection Officer was re-consulted. The report concludes minor contamination presence on site. Part (b) of condition O16, to reiterate, already secured through the hybrid permission, requires prior to the occupation of Phases 2&3, the applicant submits a verification report demonstrating the completion of works (as required) and the effectiveness of remediation. Officers are satisfied that the extant condition schedule secures adequately, the mechanism to ensure the applicant demonstrate adequate remediation has taken place, through requiring the submission of a verification report.

#### **Impact on Heritage Assets**

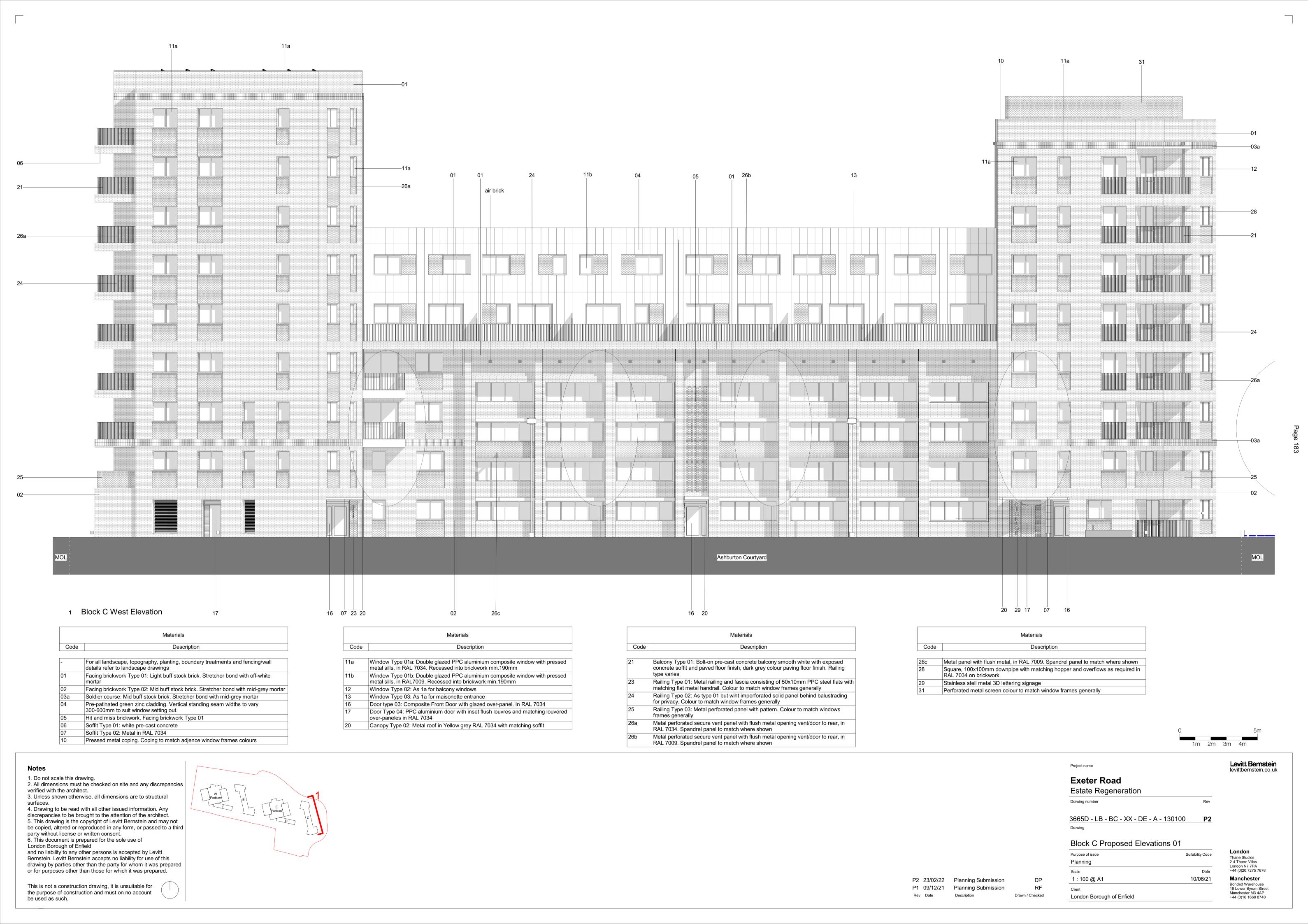
- 9.76. Policy HC1 of the London Plan outlines that development proposals affecting heritage assets and their settings, should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Regards archaeology, the policy outlines that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 9.77. Policy CP31 outlines that the Council will ensure that built development and interventions in the public realm that impact on heritage assets have regard to their special character and are based on an understanding of their context.
- 9.78. Policy DMD44 outlines that applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused.
- 9.79. Paragraphs 201 and 202 of the NPPF outline the required approach to assessment regards development which affects designated heritage assets, depending on whether harm is concluded to be substantial or less than substantial. Paragraph 203 of the NPPF outlines that the effect of an application on the significance of a non-designated heritage assets should be taken into account in the determination

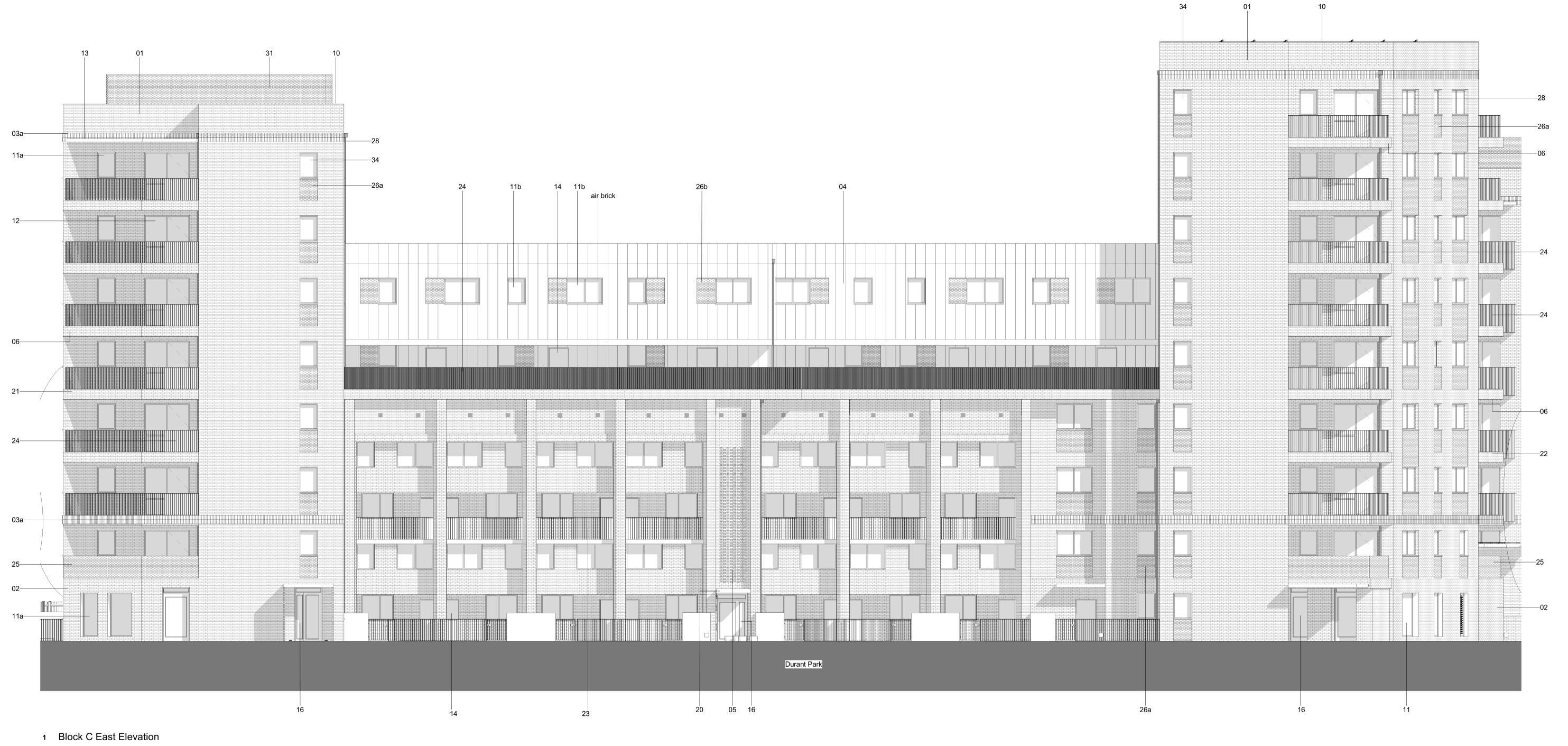
- process and that in weighing applications that directly or indirectly affect nondesignated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 9.80. In support of the hybrid application, the applicant submitted a Heritage Statement and an Archaeology Assessment. The heritage statement concluded that the proposed development would have a positive impact on the site and the surrounding area, inclusive of the locally listed Durants Park on the basis of additional planting more clearly defining the boundary of the estate
- 9.81. This conclusion was not fully supported with Officers considering that the proposed development may result in some harm to the non-designated heritage asset; Durants Park. This was namely from views from the north through the site by way of the intensification of the site and the harm was noted as cumulative to that caused by the existing buildings of the estate. However, in taking a balanced judgement, as required by Paragraph 202 of the NPPF, it was concluded that additional landscaping along the northern edge of the estate would be proportionate and suitable mitigation. This submission provides the detail of that landscaping to this northern edge. The landscaping scheme proposed is supported and therefore the development's impact on the non -designated heritage asset will be appropriately mitigated.
- 9.82. Historic England GLAAS were consulted on the hybrid application and advised thay that there is low potential for archaeological remains on site and that no further assessment or conditions were necessary.

#### 10. Conclusions

- 10.1. The principle of this estate regeneration scheme has been accepted through the hybrid application (21/02076/OUT), as amended by the subsequent approved S96a application (21/04792/NMA). The scheme included a Design Code and a set of parameter plans, as well as details surrounding housing/tenure mix and the site-wide approach to highways amongst other things.
- 10.2. This application for reserved matters provides details of appearance and landscaping for Phases 2 and 3, pursuant to the outline permission. Officers are satisfied that the details submitted will deliver a scheme of high quality design providing good quality accommodation for future residents and a well-considered landscaping and public realm within which the buildings will sit. The development as proposed is in compliance overall with the development plan and approval is therefore recommended







	Materials
Code	Description
01	Facing brickwork Type 01: Light buff stock brick. Stretcher bond with off-white mortar
02	Facing brickwork Type 02: Mid buff stock brick. Stretcher bond with mid-grey mortar
03a	Soldier course: Mid buff stock brick. Stretcher bond with mid-grey mortar
04	Pre-patinated green zinc cladding. Vertical standing seam widths to vary 300-600mm to suit window setting out.
05	Hit and miss brickwork. Facing brickwork Type 01
06	Soffit Type 01: white pre-cast concrete
10	Pressed metal coping. Coping to match adjence window frames colours
4.4	

	Materials
Code	Description
11a	Window Type 01a: Double glazed PPC aluminium composite window with pressed metal sills, in RAL 7034. Recessed into brickwork min.190mm
11b	Window Type 01b: Double glazed PPC aluminium composite window with pressed metal sills, in RAL7009. Recessed into brickwork min.190mm
12	Window Type 02: As 1a for balcony windows
13	Window Type 03: As 1a for maisonette entrance
14	Door Type 01: Flush door and metal frame panel PPC finished, in RAL 7034
16	Door type 03: Composite Front Door with glazed over-panel. In RAL 7034
20	Canopy Type 02: Metal roof in Yellow grey RAL 7034 with matching soffit
	·

Code	Description
21	Balcony Type 01: Bolt-on pre-cast concrete balcony smooth white with exposed concrete soffit and paved floor finish, dark grey colour paving floor finish. Railing type varies
22	Balcony Type 02: As type 1, but inset balcony
23	Railing Type 01: Metal railing and fascia consisting of 50x10mm PPC steel flats with matching flat metal handrail. Colour to match window frames generally
24	Railing Type 02: As type 01 but wiht imperforated solid panel behind balustrading for privacy. Colour to match window frames generally
25	Railing Type 03: Metal perforated panel with pattern. Colour to match windows frames generally
26a	Metal perforated secure vent panel with flush metal opening vent/door to rear, in RAL 7034. Spandrel panel to match where shown

Materials

	Materials	
Code	Description	
26b	Metal perforated secure vent panel with flush metal opening vent/door to rear, in RAL 7009. Spandrel panel to match where shown	
28	Square, 100x100mm downpipe with matching hopper and overflows as required in RAL 7034 on brickwork	
31	Perforated metal screen colour to match window frames generally	
34	AOV to specialist design and specification. Frame in Ral 7034	



Notes
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hecked on site and any discrepancies

3. Unless shown otherwise, all dimensions are to structural surfaces.

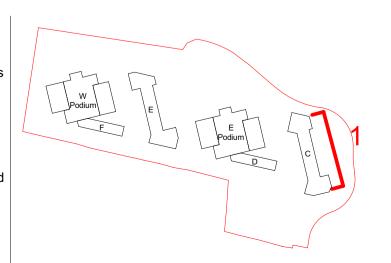
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P3	04/03/22	Planning Update	D
P2	23/02/22	Planning Submission	D
P1	09/12/21	Planning Submission	F
Rev	/ Date	Description	Drawn / Chec

**Levitt Bernstein** levittbernstein.co.uk Project name **Exeter Road** Estate Regeneration Drawing number 3665D - LB - BC - XX - DE - A - 130101 **P3** London Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676

Block C Proposed Elevation	ons 02	
Purpose of issue	Suitability Code	London Thane Studios
Planning		2-4 Thane Villas London N7 7PA
Scale	Date	+44 (0)20 7275 7676
1 : 100 @ A1	10/06/21	Manchester
Client		Bonded Warehouse 18 Lower Byrom Street
London Borough of Enfield		Manchester M3 4AP +44 (0)16 1669 8740



1 Block C North Elevation



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> P2 23/02/22 Planning Submission P1 09/12/21 Planning Submission

RF Drawn / Checked

3665D - LB - BC - XX - DE - A - 130102 **P2** Block C Proposed Elevations 03 Purpose of issue Suitability Code Planning Date 10/06/21 1 : 100 @ A1 London Borough of Enfield

**Exeter Road** 

Drawing number

Estate Regeneration

Materials

Description

Facing brickwork Type 01: Light buff stock brick. Stretcher bond with off-white

Facing brickwork Type 02: Mid buff stock brick. Stretcher bond with mid-grey

Soldier course: Mid buff stock brick. Stretcher bond with mid-grey mortar

Pressed metal coping. Coping to match adjence window frames colours Window Type 01a: Double glazed PPC aluminium composite window with pressed metal sills, in RAL 7034. Recessed into brickwork min.190mm

Door Type 04: PPC aluminium door with inset flush louvres and matching

Railing Type 02: As type 01 but wiht imperforated solid panel behind balustrading for privacy. Colour to match window frames generally

Balcony Type 01: Bolt-on pre-cast concrete balcony smooth white with exposed concrete soffit and paved floor finish, dark grey colour paving floor finish. Railing

Railing Type 03: Metal perforated panel with pattern. Colour to match windows

Metal perforated secure vent panel with flush metal opening vent/door to rear, in

Square, 100x100mm downpipe with matching hopper and overflows as required

PV Panels. Max height of panels should be no higher than the parapet height

Soffit Type 01: white pre-cast concrete

louvered over-paneles in RAL 7034

type varies

frames generally

in RAL 7034 on brickwork

Window Type 02: As 1a for balcony windows

RAL 7034. Spandrel panel to match where shown

(not visible in elevation) Flush mounted if on standing seam AOV to specialist design and specification. Frame in Ral 7034

Code

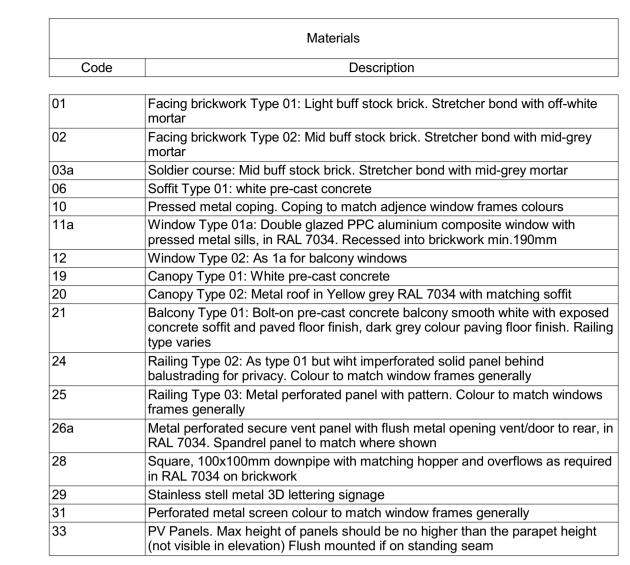
06

London Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676 Manchester Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP +44 (0)16 1669 8740

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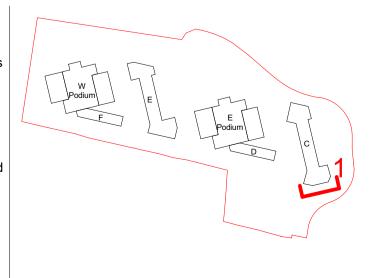
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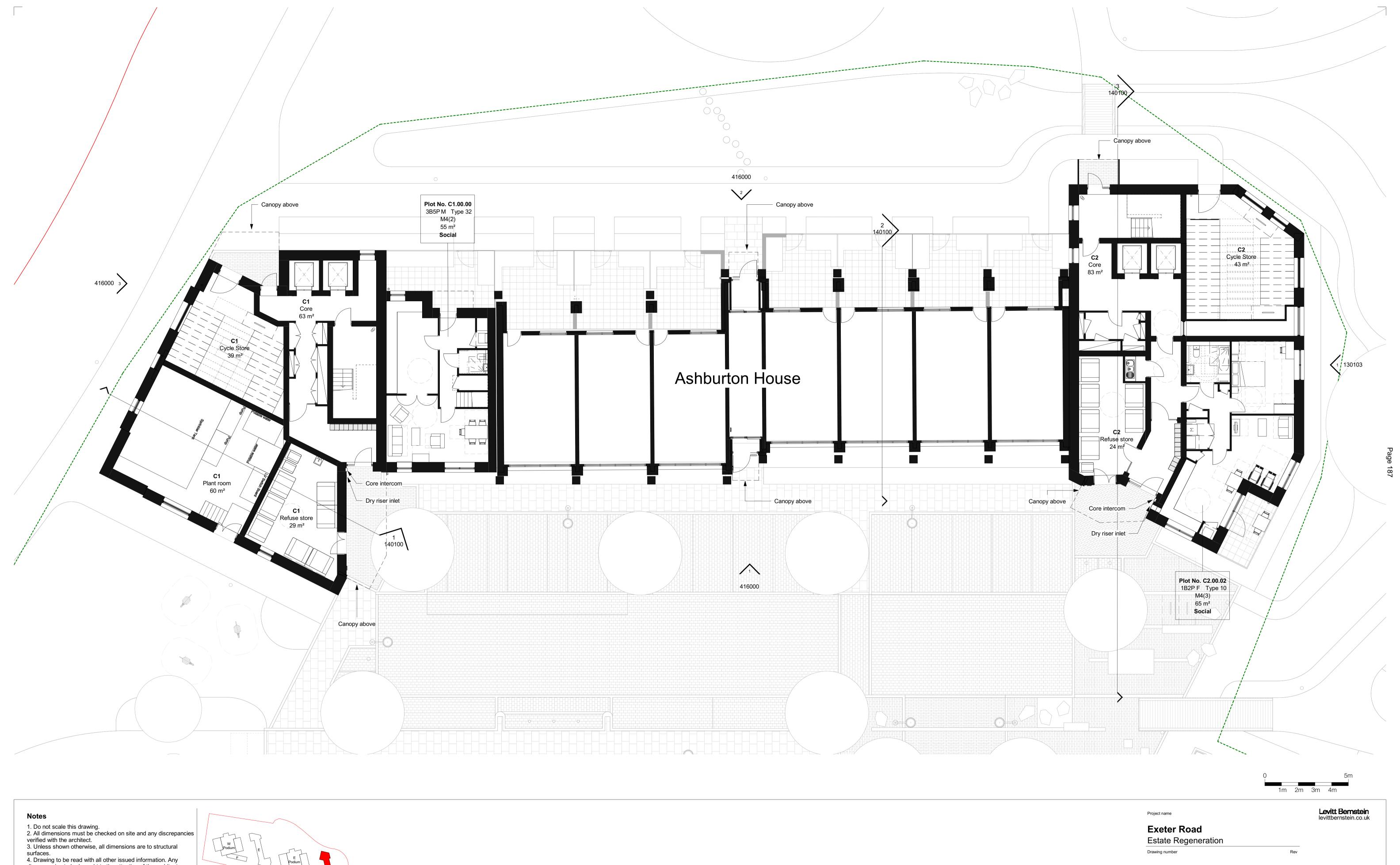
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P2	23/02/22	Planning Submission	
P1	09/12/21	Planning Submission	
Rev	Date	Description	Drawn /

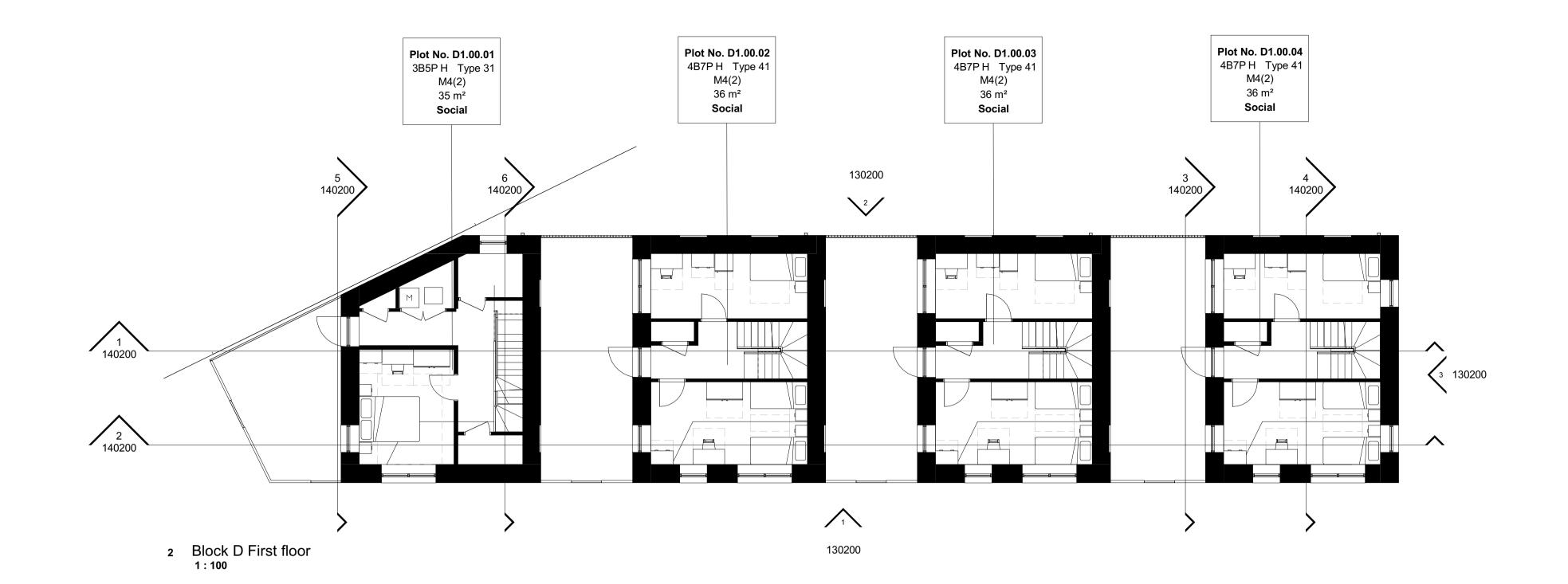
Exeter Road Estate Regeneration		
Drawing number	Rev	
3665D - LB - BC - XX - DE - A - 13010	3 <b>P2</b>	
Drawing		
Block C Proposed Elevations 04		
9	Suitability Code	London Those Studies
Block C Proposed Elevations 04	Suitability Code	Thane Studios 2-4 Thane Villas
Block C Proposed Elevations 04 Purpose of issue	Suitability Code	Thane Studios
Block C Proposed Elevations 04  Purpose of issue Planning	, 	Thane Studios 2-4 Thane Villas London N7 7PA
Block C Proposed Elevations 04  Purpose of issue Planning  Scale	Date	Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676

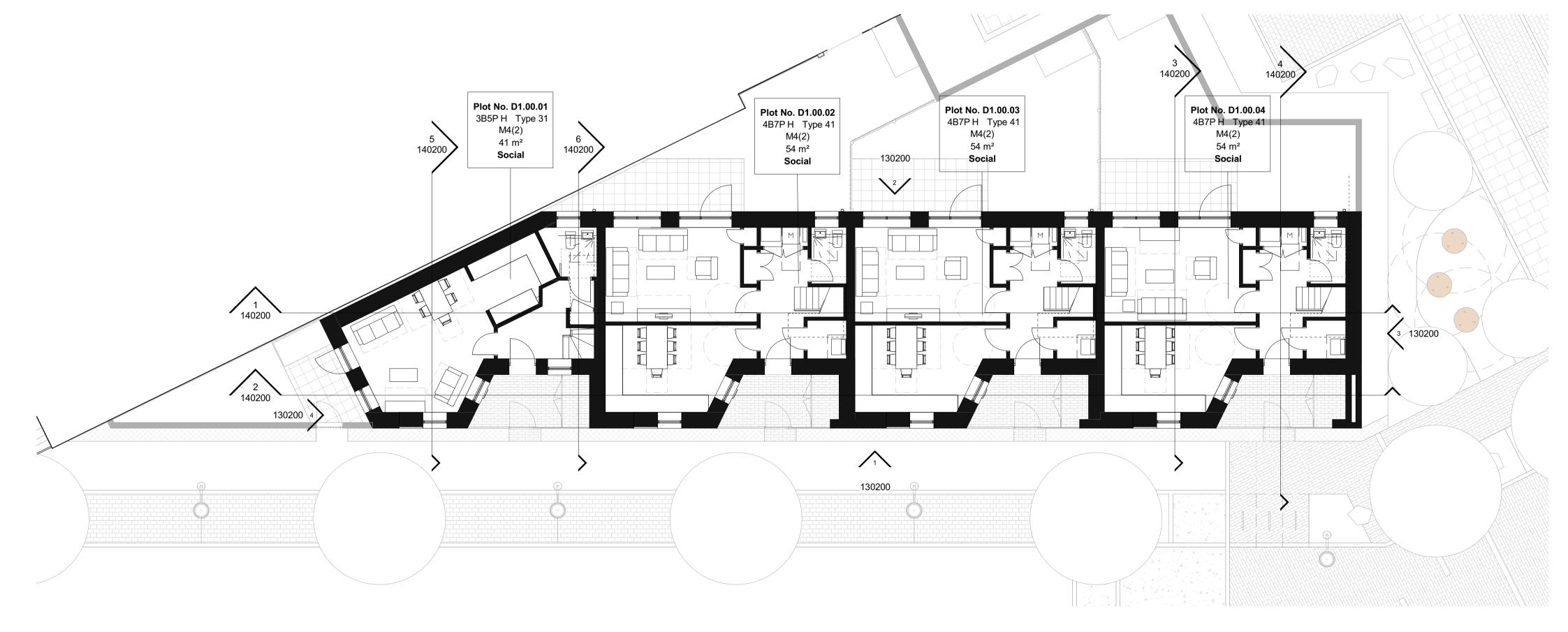
Project name





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1 Block D Ground Floor 1:100



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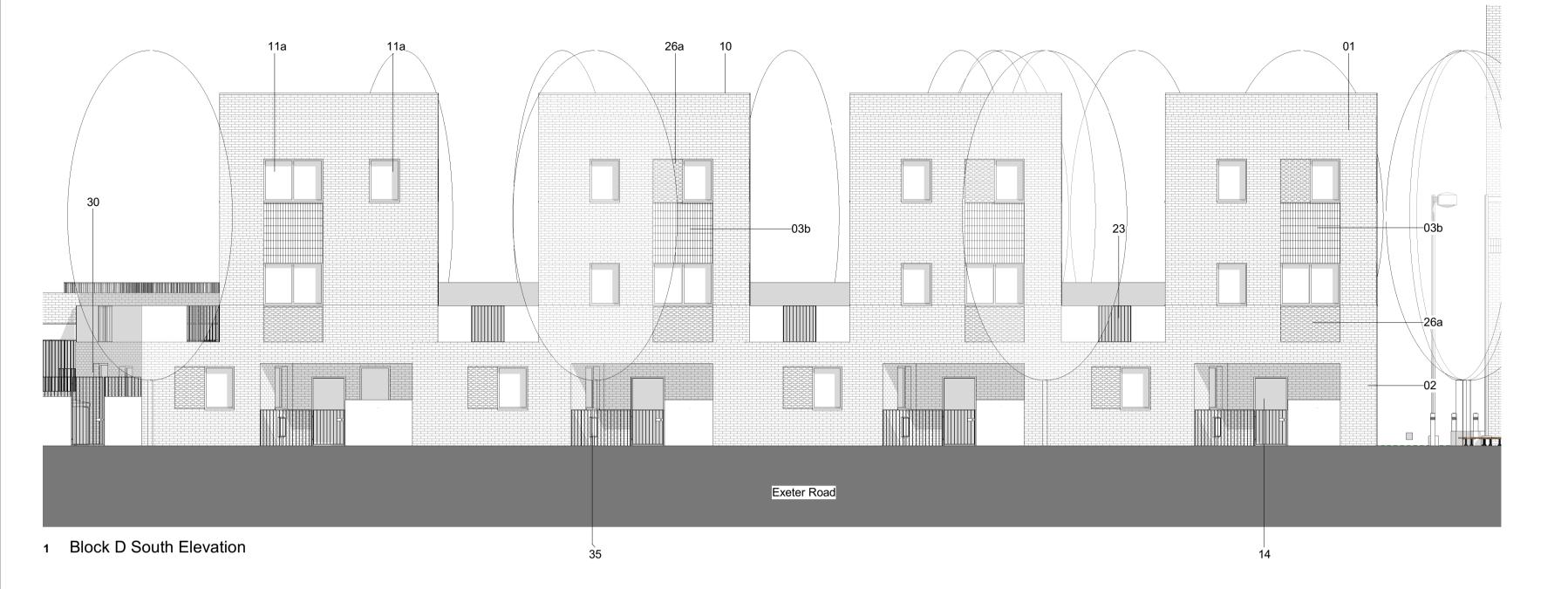
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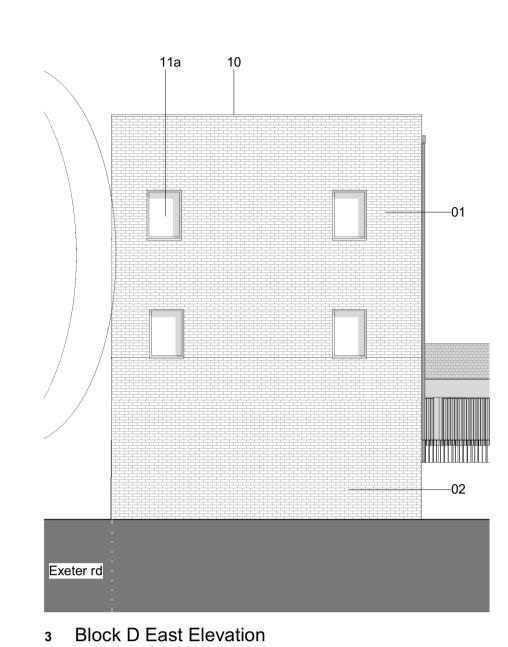
M= Maisonette H= House

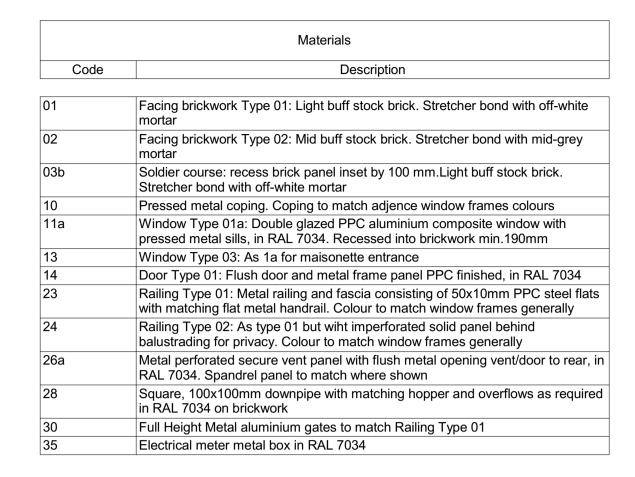
P1 09/12/21 Planning Submission

Drawn / Checked

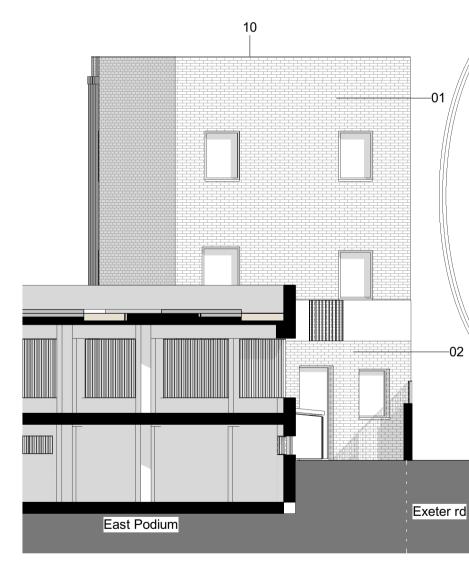
	1m 2m	3m 4m
Project name		<b>Levitt Berns</b> levittbernstein.
Exeter Road		
Estate Regeneration		
Drawing number	Rev	
Block D Proposed Ground and Floor - Level 00-01	First	
Purpose of issue	Suitability Code	London Thane Studios
Planning		2-4 Thane Villas London N7 7PA
Scale	Date	+44 (0)20 7275 7676
1 : 100 @ A1	27/07/21	Manchester Bonded Warehouse
Client		18 Lower Byrom Stree
		Manchester M3 4AP



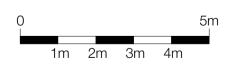








4 Block D West Elevation



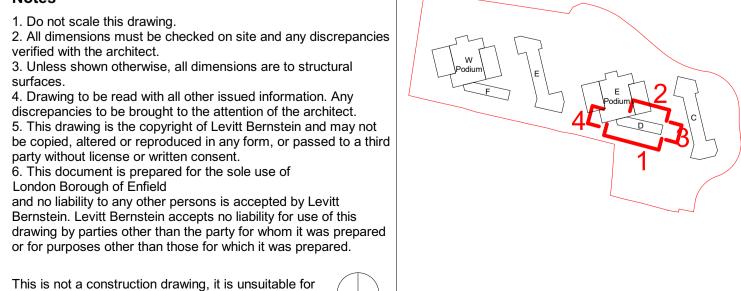
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18 Lower Byrom Street

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P3 09/03/22 Planning Update P2 24/02/22 Planning Submission P1 09/12/21 Planning Submission Drawn / Checked Block D Proposed Elevations London Purpose of issue Suitability Code Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676 Planning 10/11/21 Manchester 1 : 100 @ A1 Bonded Warehouse Manchester M3 4AP +44 (0)16 1669 8740 London Borough of Enfield

3665D - LB - BD - XX - DE - A - 130200

Project name

Drawing number

**Exeter Road** 

Estate Regeneration



Key Raised PCC Kerb 125mm upstand, Marshalls Conservation X Or similar Approved, Colour: Silver Grey Flush PCC Kerb, Marshalls Conservation X Or similar Approved, Colour: Silver Grey Hit and Miss Granite Kerb 125mm upstand, Marshalls Conservation X Or similar Approved,100mm Spacing, Colour: Dark Grey Flush Steel Edge Galvansied, By Kinley or Similar Approved Steel Railing - 1100mm High To Match Architectural Railing PROPOSED TREE PLANTING Brick Garden Wall - 1462mm High To Match Building Brick Work TREE TO BE REMOVED B03 Steel Gate - 1100mm High To Match Architectural Railing Refer to Arboricultural Report TREE TO BE RETAINED Brick Garden Wall - 2100mm High To Match Building Brick Work Timber Closed Board Fence - 1800mm High Refer to Planting Plan FSC Certified Timber Steel Raised Planter with House No. - 1100mm High Colour: RAL To Match Architectural Railing Adopted Asphalt Surface Adopted Permeable PCC Block Paving 240x160mm, Stretcher Bond, Colour: Grey Mix - 50% Pennant Grey/50% Charcaol P03 Steel Gate - 2100mm High To Match Architectural Railing Adopted Permeable PCC Block Paving 240x160mm, Stretcher Bond, Colour: Burnt Ochre Brick Retaining Wall to match adjacent building, with Railing to meet requirements of Part K Adoptable PCC Flag Pavers 600x450mm, Staggered Bond, Colour: Charcoal Brick Boundary Wall 1500mm High with Steel Railing above PCC Pavers 400x400mm, Stacked Bond, Colour: Charcoal to total 2100mm High, To Match Architectural Railing Tarmac Colourchip with Stone Aggregate Colour: Silver Grey Brick Retaining Wall with 150mm upstand and 1100mm Steel Railing above. To Match Architectural Railing PCC Pavers - Natural Stone Wearing Course 300x100mm, Stretcher Bond, Colour: Mid Grey Granite -Steel Railing to Play Area - 600mm High To Match Architectural Railing PCC Pavers - Natural Stone Wearing Course 300x100mm, Stretcher Bond, Colour: Anthracite Granite - Textured Concrete Bench with Timbertop Seat,By Furnitubes or Stepping Rocks - Play Feature Surface to be free of jagged/sharp edges PCC Paving Band - Natural Stone Wearing Course 300x200mm, Colour: Light Granite - Textured Timber Decking - Accoya 145x22, FSC Certified Timber with Anti-slip Grip Stepping Logs - Hardwood Timber Post, Ping Pong Table, By Ping Out or Equivalent Approved, RAL 3032 to match other metal furniture Asphalt Paths Colour: Black, To Match Existing Steel Exercise Equipment - Kebne Outdoor Gym by Nola or Equivalent Approved, RAL 3032 to match other metal furniture Compacted Self-Binding Gravel Path Breedon or Equivalent Approved Reclaimed Timber Log Retained from Trees Felled on Site Where Possible Bench Seat To Enfield Parks Specification Sheffield Steel Cycle Stand, By Furnitubes or Equivalent Approved RAL 3032 to match other metal furniture Wetpour Safety Surface Colour: Air Blue RAL 240 85 10 Bin Store with Green Roof, Approx. 2m(L) x 1m(W) x 1.4m(H), Steel frame with timber panels, RAL colour to match building Cycle Store with Green Roof, Approx. 2m(L) x 1m(W) x 1.4m(H), Suitable for 2x Bicycle or 1x Adapted Cycle Rubber Mulch Safety Surface Coloured Concrete Skate Features Colour: Flame Red, RAL 020 50 50 900mm High x 100mm Ø, RAL 3032 to match other metal furniture Concrete Steps Bollard - Dropped Contrasting Visibility Strips, Colour : Silver Grey 900mm High x 100mm Ø, RAL 3032 to match other metal furniture Motorcycle Ground Anchor Colour: Black Adopted Street Light, Column Colour: Black and RAL 3032 to match other metal furniture in Exeter Road Square, To Engineer's Detail and Specificaiton L02
Column Light - Wild Life Sensitive, To Engineer's Detail and Specificaiton Picnic bench - By Furnitubes or Equivalent Approved **L03**Tree Uplighter, To Engineer's Detail and Specificaiton HABITAT FEATURE Recessed Bird and Bat Box Installed on Building Facade (as per Ecologist Recommendation) and Log Pile/Insect Hotels within Planting Beds (Where Indicated) NOTE:

- All materials within highway boundary
subject to local highways authority approval

- All service and manhole covers to be recessed to allow paved surfaces to be inlaid
- All service and manhole covers to be located in hardstanding when possible

> P1 08/12/21 Planning Issue Project name

**Exeter Road Masterplan Estate Regeneration** 

Drawing number

3665D - LB - XX - 00 - DR - L - 200003

Notes

surfaces.

architect.

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Landscape GA - Phase 2&3 - Block E

Purpose of issue Tender

As indicated @ A1

London Borough of Enfield

Levitt Bernstein

Drawn / Checked

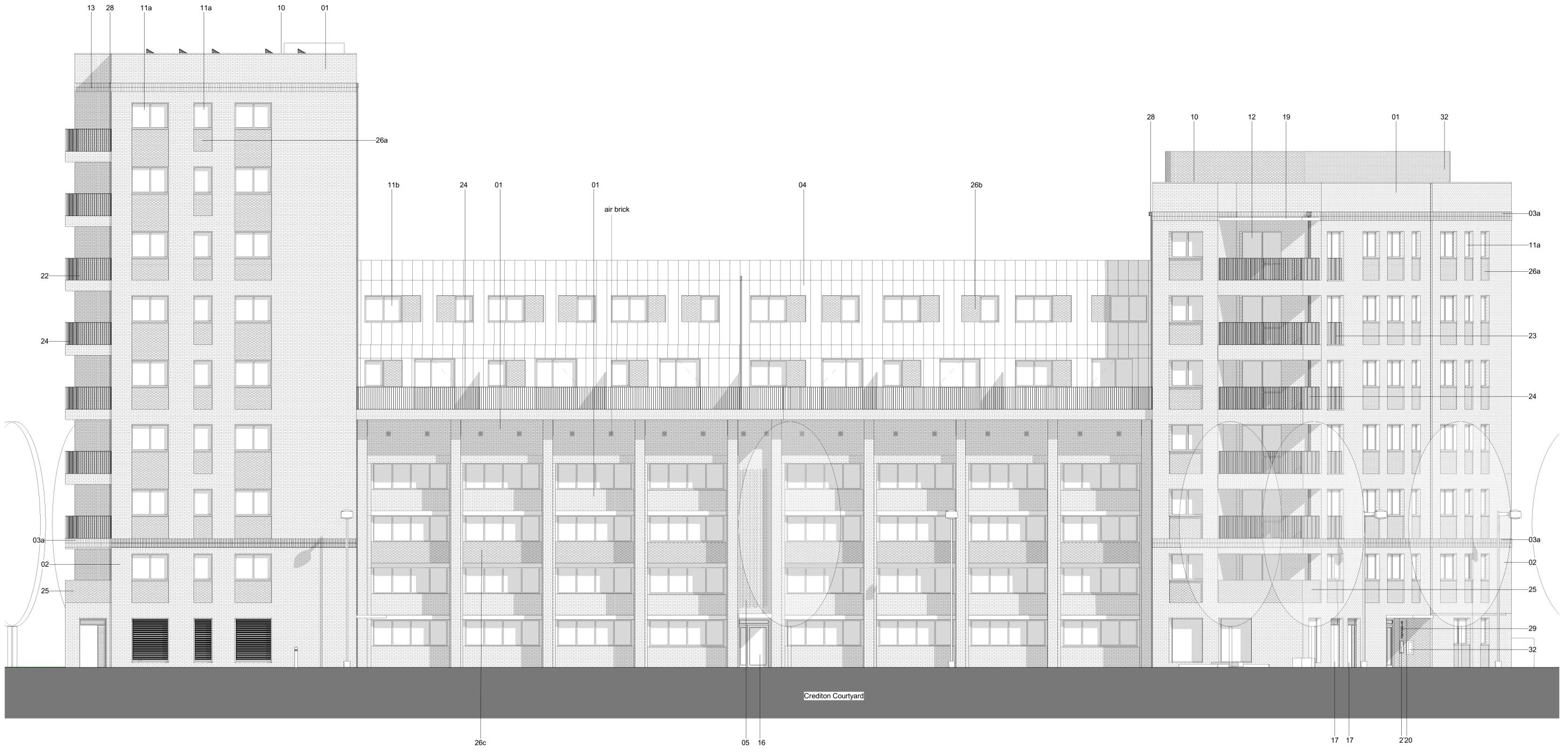
15/10/21

London
Thane Studios
2-4 Thane Villas

London N7 7PA +44 (0)20 7275 7676 Manchester

Bonded Warehouse 18 Lower Byrom Street

Manchester M3 4AP +44 (0)161 669 8740



## 1 Block E Elevation 1

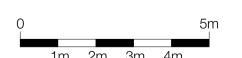
	Materials			
Code	Description			
01	Facing brickwork Type 01: Light buff stock brick. Stretcher bond with off-white mortar			
02	Facing brickwork Type 02: Mid buff stock brick. Stretcher bond with mid-grey mortar			
03a	Soldier course: Mid buff stock brick. Stretcher bond with mid-grey mortar			
04	Pre-patinated green zinc cladding. Vertical standing seam widths to vary 300-600mm to suit window setting out.			
05	Hit and miss brickwork. Facing brickwork Type 01			
10	Pressed metal coping. Coping to match adjence window frames colours			
11a	Window Type 01a: Double glazed PPC aluminium composite window with pressed metal sills, in RAL 7034. Recessed into brickwork min.190mm			

Code 11b	Description
11b	
	Window Type 01b: Double glazed PPC aluminium composite window with pressed metal sills, in RAL7009. Recessed into brickwork min.190mm
12	Window Type 02: As 1a for balcony windows
13	Window Type 03: As 1a for maisonette entrance
16	Door type 03: Composite Front Door with glazed over-panel. In RAL 7034
17	Door Type 04: PPC aluminium door with inset flush louvres and matching louvered over-paneles in RAL 7034
19	Canopy Type 01: White pre-cast concrete
20	Canopy Type 02: Metal roof in Yellow grey RAL 7034 with matching soffit

Balcony Type 02: As type 1, but inset balcony

Materials			
Code	Description		
23	Railing Type 01: Metal railing and fascia consisting of 50x10mm PPC steel flats with matching flat metal handrail. Colour to match window frames generally		
24	Railing Type 02: As type 01 but wiht imperforated solid panel behind balustrading for privacy. Colour to match window frames generally		
25	Railing Type 03: Metal perforated panel with pattern. Colour to match windows frames generally		
26a	Metal perforated secure vent panel with flush metal opening vent/door to rear, in RAL 7034. Spandrel panel to match where shown		

Materials			
Code	Description		
26b	Metal perforated secure vent panel with flush metal opening vent/door to rear, in RAL 7009. Spandrel panel to match where shown		
26c	Metal panel with flush metal, in RAL 7009. Spandrel panel to match where shown		
27	Stainless stell doorbell/intercom system		
28	Square, 100x100mm downpipe with matching hopper and overflows as required in RAL 7034 on brickwork		
29	Stainless stell metal 3D lettering signage		
32	Dry riser inlet panel. Stainless steel finish		



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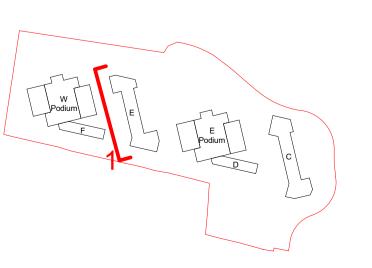
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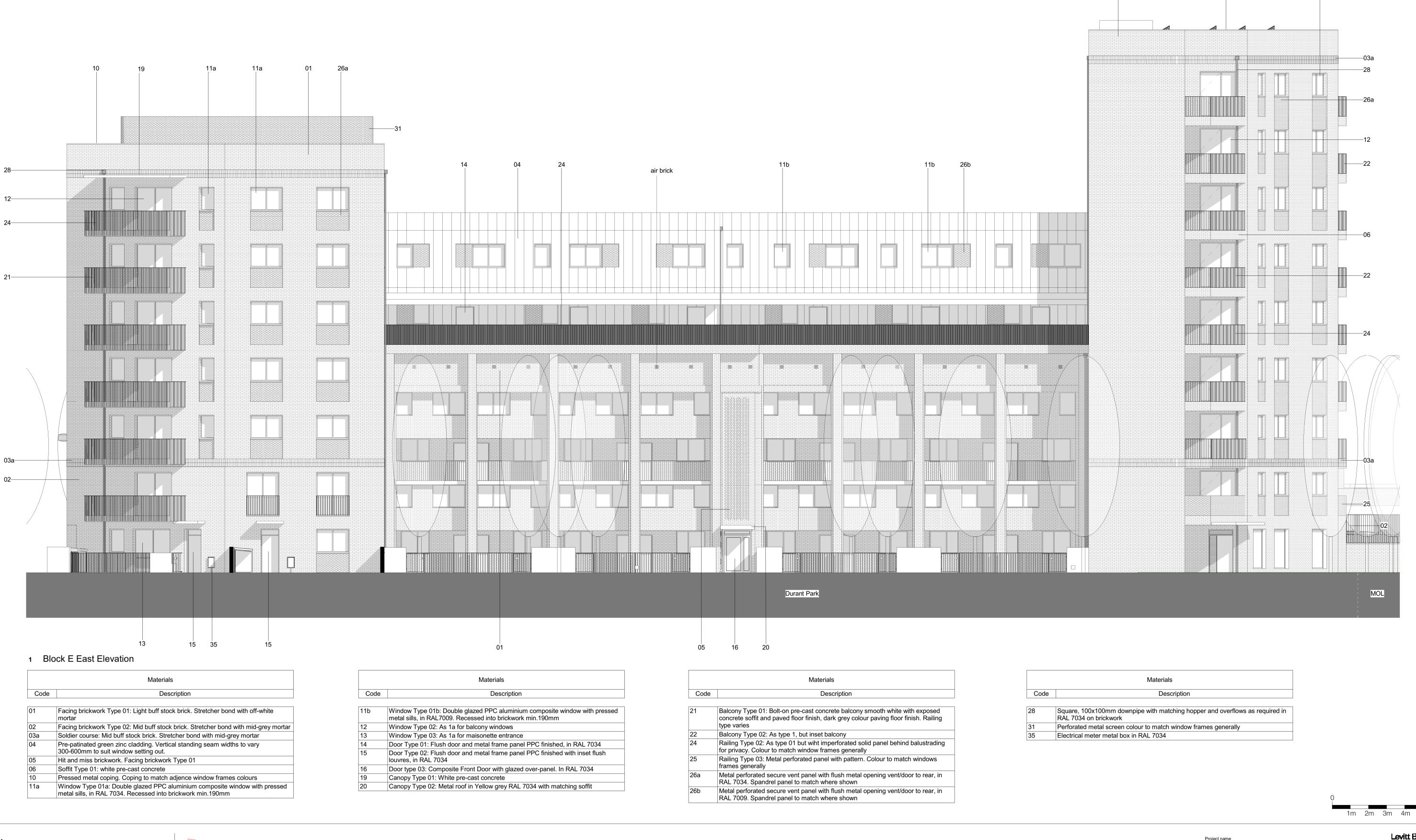


**Exeter Road Estate Regeneration** Drawing number 3665D - LB - BE - XX - DE - A - 130300 **P2** Purpose of issue Planning

Project name

P2 23/02/22	Planning Submission	DP
P1 09/12/21	Planning Submission	RF
Rev Date	Description	Drawn / Checked

Block E Proposed Elevation 01 Suitability Code Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676 Date 11/15/21 Manchester 1 : 100 @ A1 Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP +44 (0)16 1669 8740 London Borough of Enfield





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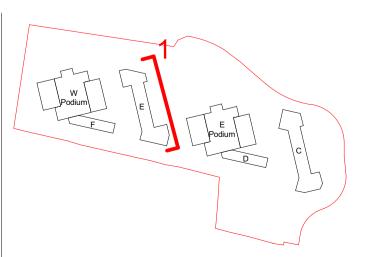
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P2 23/02/22 Planning Submission DP
P1 09/12/21 Planning Submission RF
Rev Date Description Drawn / Checked

Project name

Exeter Road

Estate Regeneration

Drawing number

Rev

3665D - LB - BE - XX - DE - A - 130301

Pawing

Prawing

Block E Proposed Elevation 02

Purpose of issue Suitability Code
Planning

Scale Date
1:100@A1 11/15/21

Client
London Borough of Enfield

London
Thane Studios
2-4 Thane Villas
London N7 7PA
+44 (0)20 7275 7676

Manchester
Bonded Warehouse
18 Lower Byrom Street
Manchester M3 4AP
+44 (0)16 1669 8740



## 1 Block E South Elevation

Materials				
Code	Description			
01	Facing brickwork Type 01: Light buff stock brick. Stretcher bond with off-white mortar			
02	Facing brickwork Type 02: Mid buff stock brick. Stretcher bond with mid-grey mortar			
03a	Soldier course: Mid buff stock brick. Stretcher bond with mid-grey mortar			
05	Hit and miss brickwork. Facing brickwork Type 01			
06	Soffit Type 01: white pre-cast concrete			
07	Soffit Type 02: Metal in RAL 7034			
10	Pressed metal coping. Coping to match adjence window frames colours			
11a	Window Type 01a: Double glazed PPC aluminium composite window with pressed metal sills, in RAL 7034. Recessed into brickwork min.190mm			
14	Door Type 01: Flush door and metal frame panel PPC finished, in RAL 7034			
16	Door type 03: Composite Front Door with glazed over-panel. In RAL 7034			

	Materials		
Code	Description		
17	Door Type 04: PPC aluminium door with inset flush louvres and matching louvered over-paneles in RAL 7034		
18	Door type 05: PPC aluminium door with louvered over-paneles in RAL 7034		
19	Canopy Type 01: White pre-cast concrete		
20	Canopy Type 02: Metal roof in Yellow grey RAL 7034 with matching soffit		
21	Balcony Type 01: Bolt-on pre-cast concrete balcony smooth white with exposed concrete soffit and paved floor finish, dark grey colour paving floor finish. Railing type varies		
22	Balcony Type 02: As type 1, but inset balcony		
23	Railing Type 01: Metal railing and fascia consisting of 50x10mm PPC steel flats with matching flat metal handrail. Colour to match window frames generally		

Code	Description		
24	Railing Type 02: As type 01 but wiht imperforated solid panel behind balustrading for privacy. Colour to match window frames generally		
25	Railing Type 03: Metal perforated panel with pattern. Colour to match windows frames generally		
26a	Metal perforated secure vent panel with flush metal opening vent/door to rear, in RAL 7034. Spandrel panel to match where shown		
26b	Metal perforated secure vent panel with flush metal opening vent/door to rear, in RAL 7009. Spandrel panel to match where shown		
27	Stainless stell doorbell/intercom system		

Materials

Materials  Code Description			
29	Stainless stell metal 3D lettering signage		
31	Perforated metal screen colour to match window frames generally		
32	Dry riser inlet panel. Stainless steel finish		
33	PV Panels. Max height of panels should be no higher than the parapet height (not visible in elevation) Flush mounted if on standing seam		



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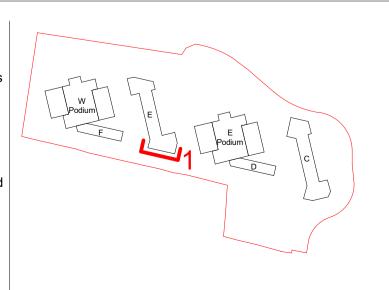
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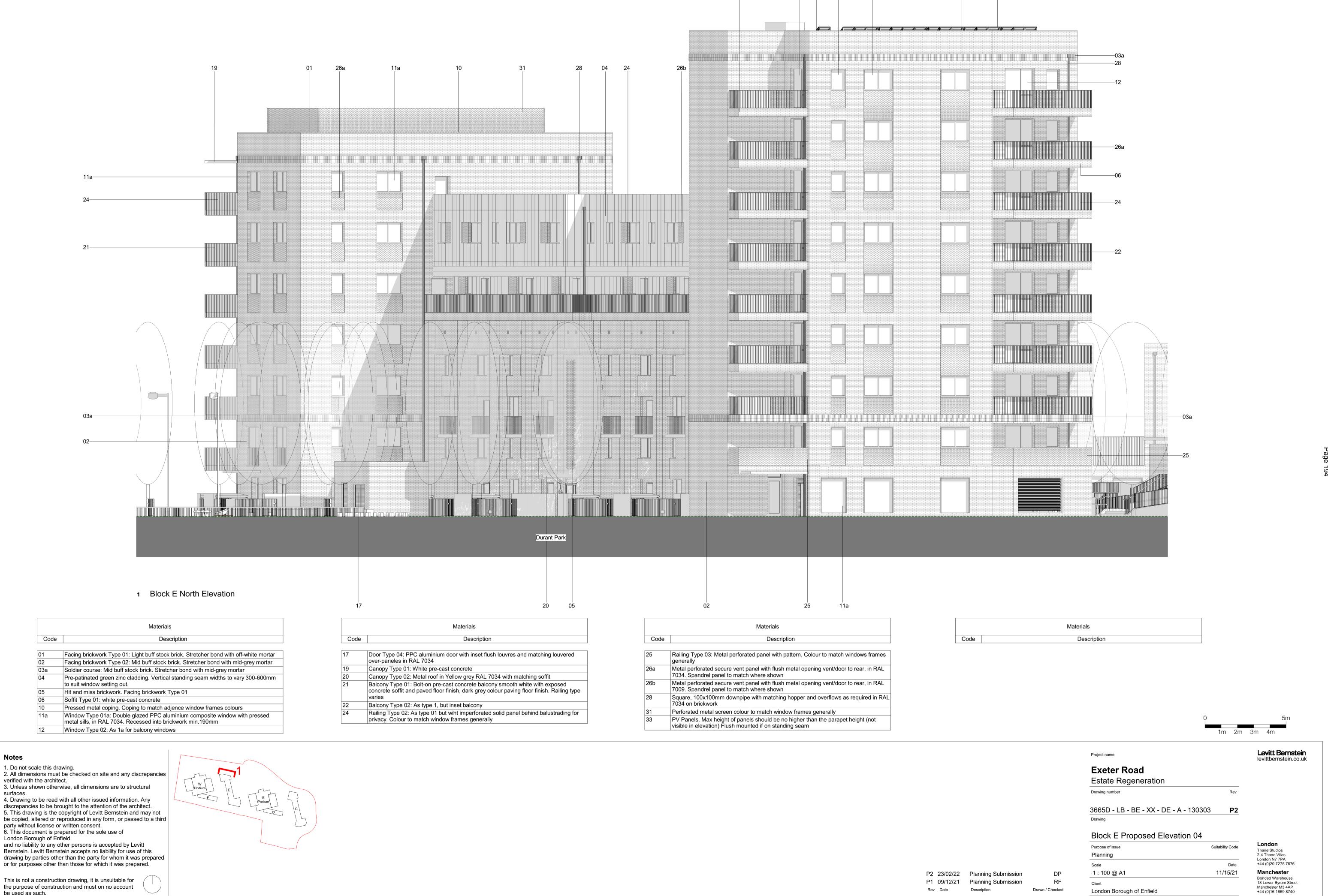
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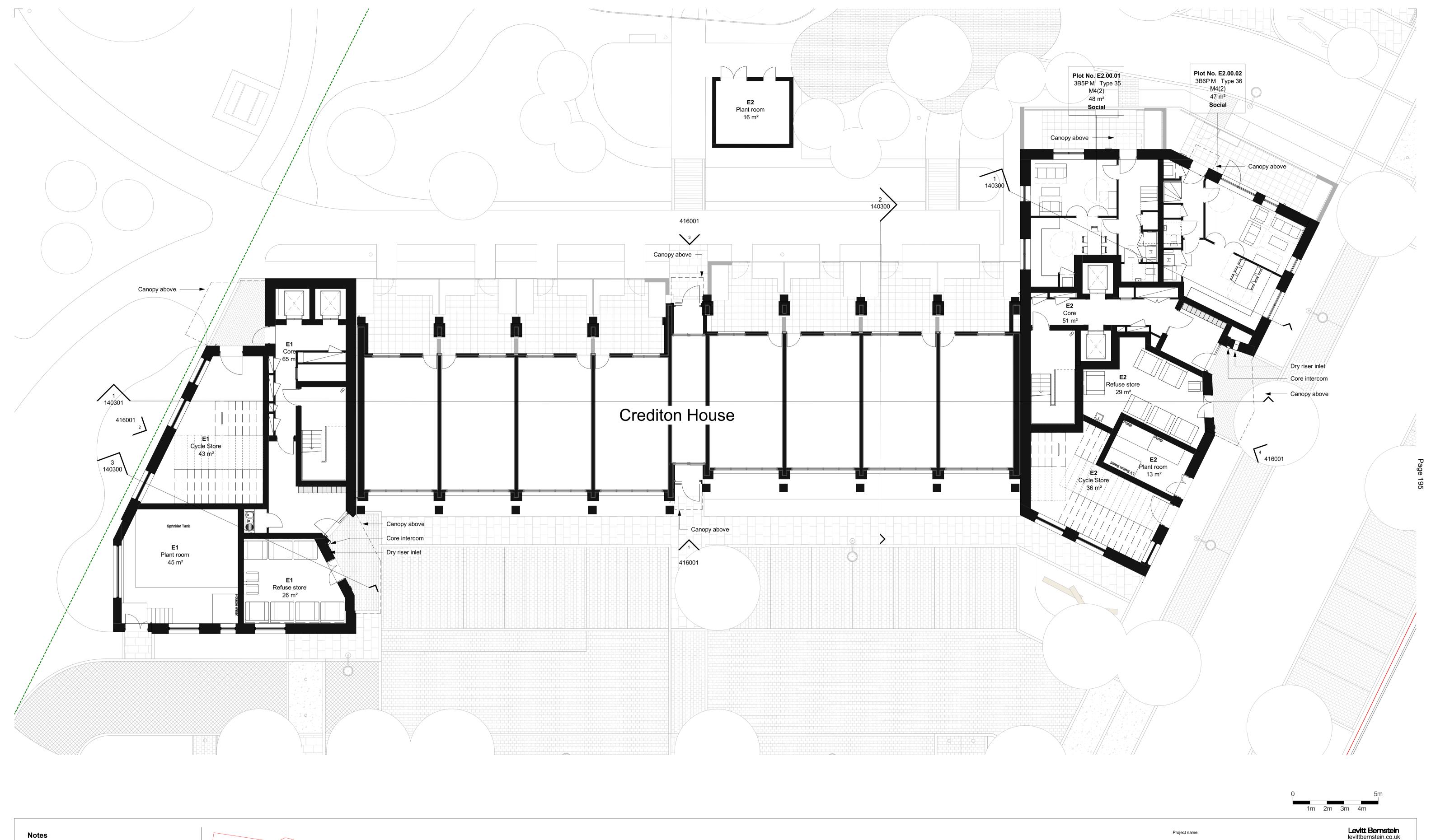


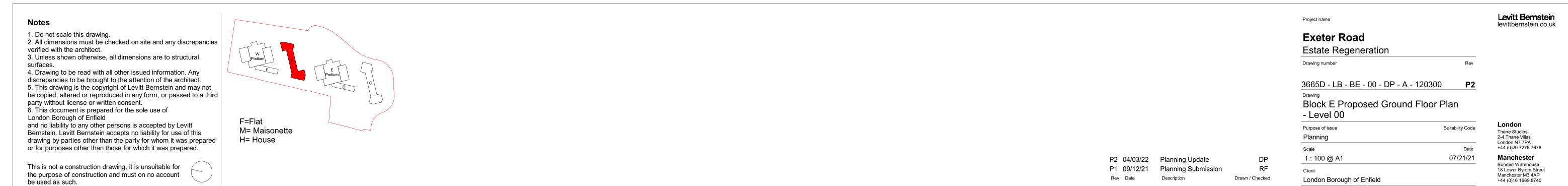
P2 23/02/22 P1 09/12/21	Planning Submission Planning Submission	DP RF

		levittbernstein.d
Exeter Road		
Estate Regeneration		
Drawing number	Rev	
3665D - LB - BE - XX - DE -	A - 130302 <b>P2</b>	
2002D - FD - DF - VV - DF -	A 100002 1 Z	
Drawing	71-100002 12	
Drawing		
		Landon
Drawing		<b>London</b> Thane Studios
Block E Proposed Eleva	ation 03	Thane Studios 2-4 Thane Villas
Drawing  Block E Proposed Eleva  Purpose of issue	ation 03	Thane Studios
Block E Proposed Eleva Purpose of issue Planning	ation 03 Suitability Code	Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676 <b>Manchester</b>
Drawing  Block E Proposed Eleva  Purpose of issue  Planning  Scale	Suitability Code	Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676

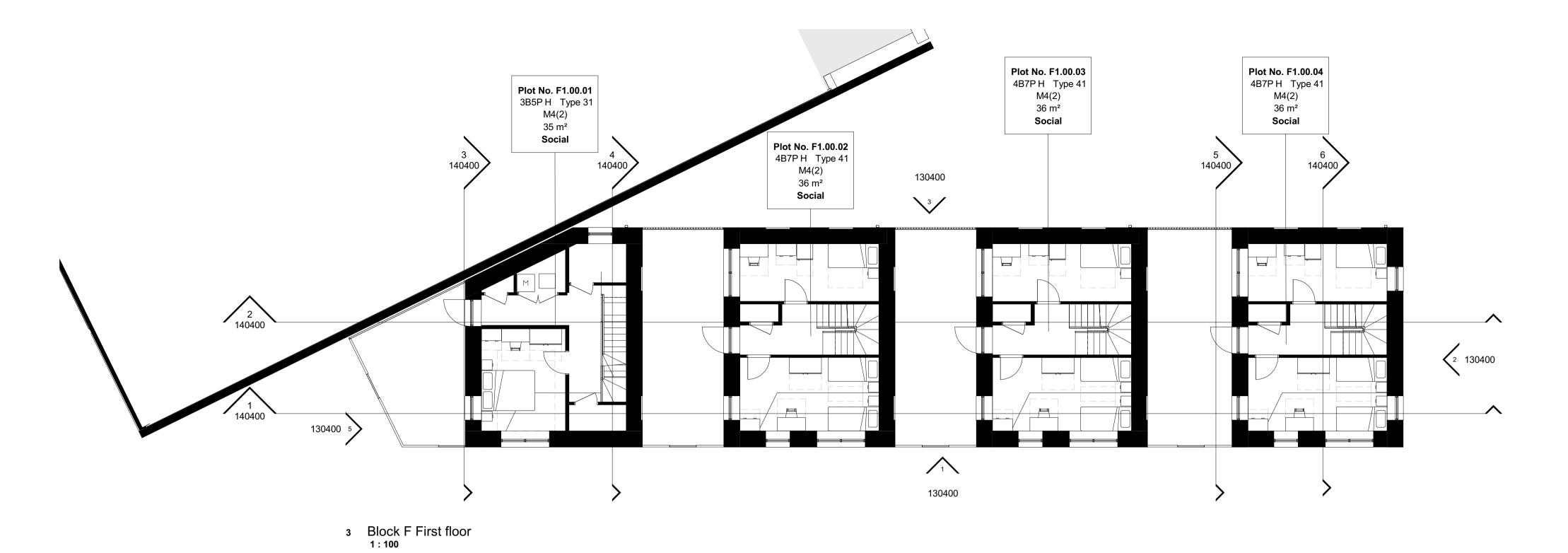


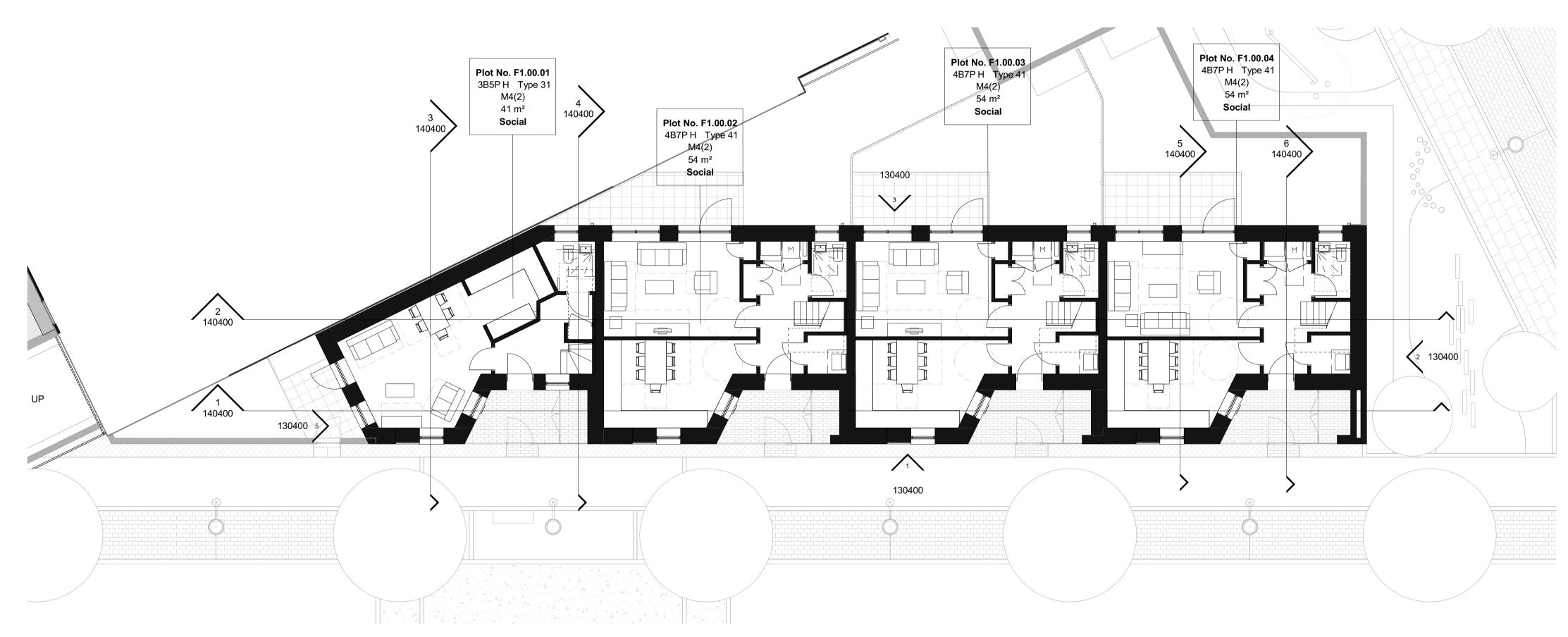
Notes



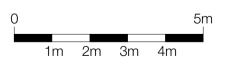








1 Block F Ground floor 1:100



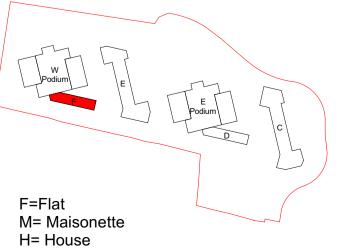
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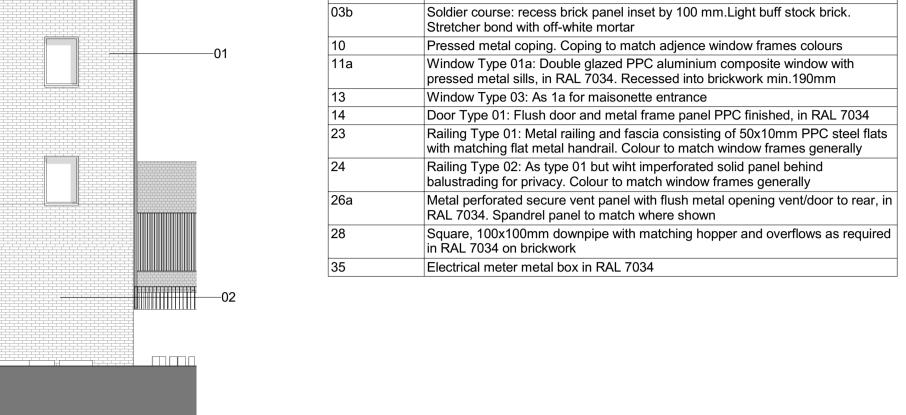
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P1 09/12/21 Planning Submission RF
Rev Date Description Drawn / Checked

Project name		<b>Levitt Berns</b> levittbernstein.
Exeter Road		
Estate Regeneration		
Drawing number	Rev	
Block F Proposed Ground and   Floor - Level 00-01	First	
Durage of icour	Suitability Code	London
Purpose of issue	Outlability Code	
Information Only		Thane Studios 2-4 Thane Villas
•	Date	Thane Studios



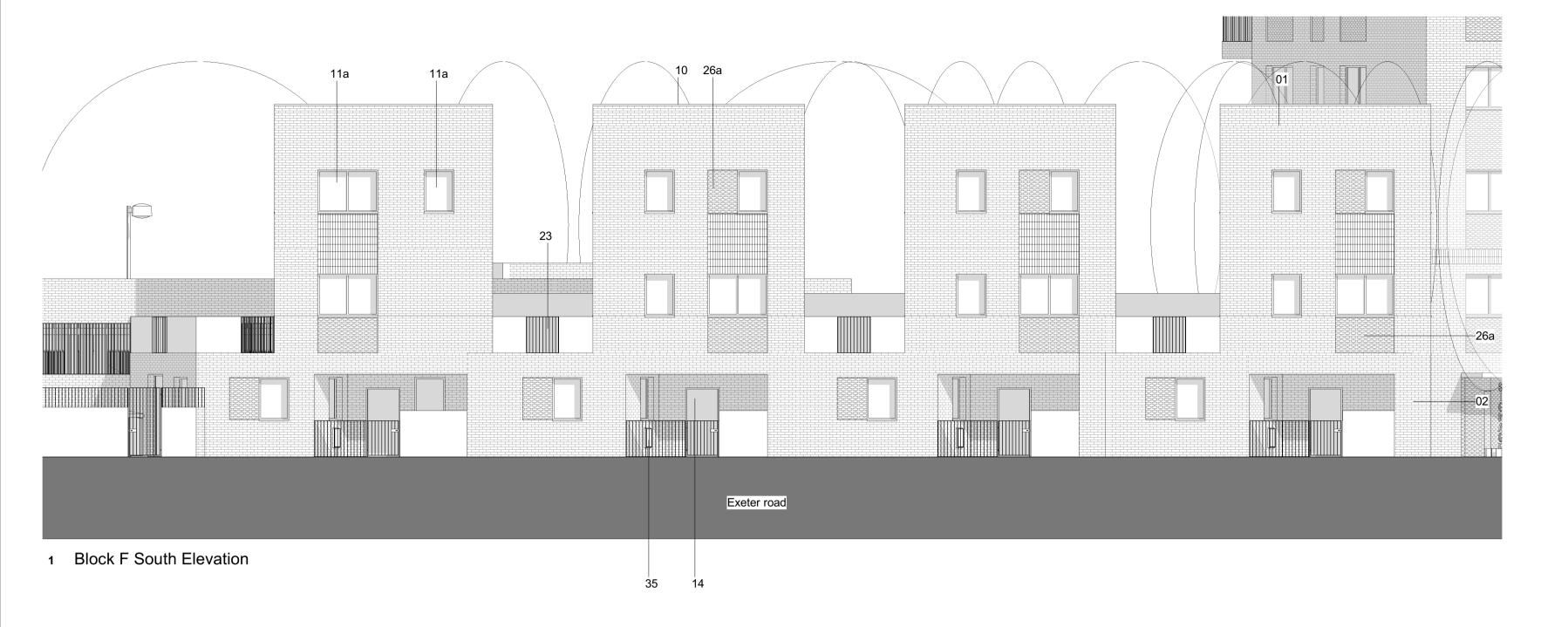
Code

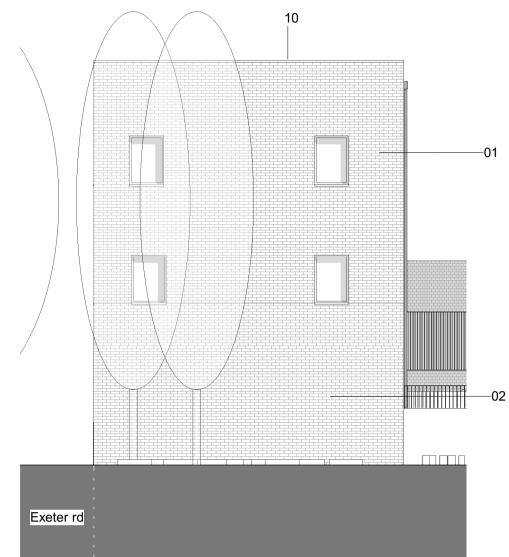
Materials

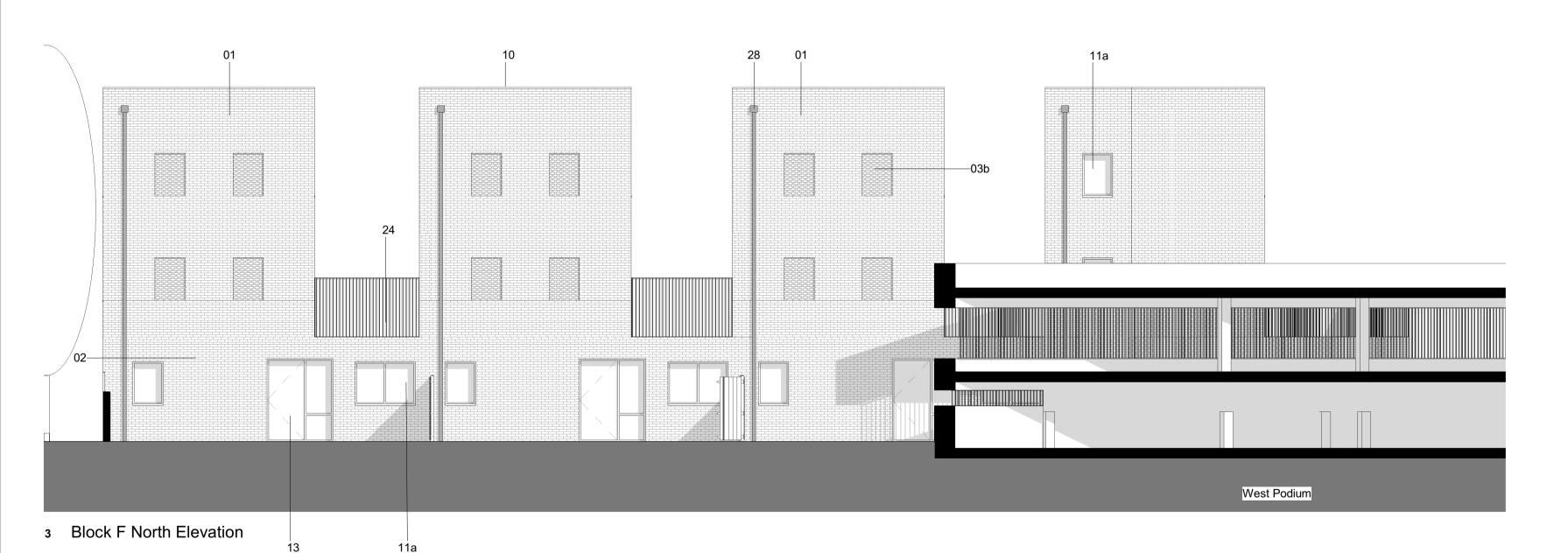
Description

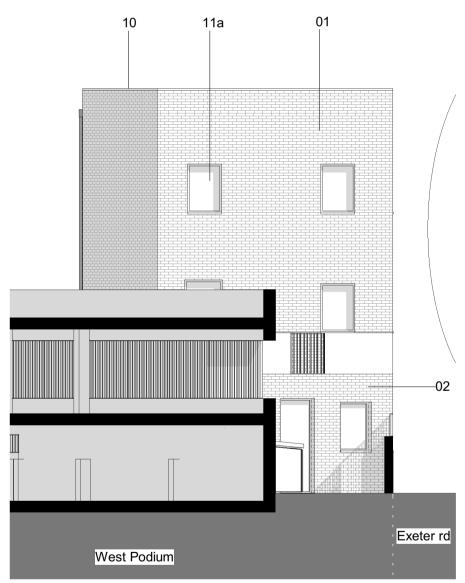
Facing brickwork Type 01: Light buff stock brick. Stretcher bond with off-white

Facing brickwork Type 02: Mid buff stock brick. Stretcher bond with mid-grey









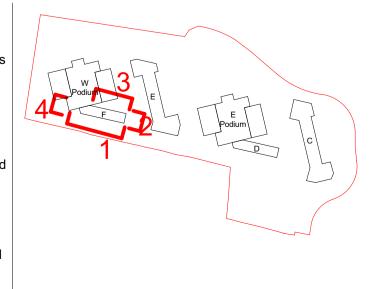
5 Block F West Elevation

2 Block F East Elevation



Levitt Bernstein

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Р3	09/03/22	Planning Update	
P2	24/02/22	Planning Submission	
P1	09/12/21	Planning Submission	

Drawing		
Block F Proposed Ele	vations	
Purpose of issue	Suitability Code	London Thane Studios
Planning		2-4 Thane Villas London N7 7PA
Scale	Date	+44 (0)20 7275 7676
1:100@A1	10/12/21	Manchester
Client		Bonded Warehouse 18 Lower Byrom Street
London Borough of Enfield		Manchester M3 4AP +44 (0)16 1669 8740

Project name

Drawing number

**Exeter Road** 

Estate Regeneration



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P2 04/03/22 Planning Update P1 08/12/21 Planning Issue

MS

Drawn / Checked

25/05/21

London
Thane Studios
2-4 Thane Villas
London N7 7PA
+44 (0)20 7275 7676

Manchester

Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP +44 (0)161 669 8740

## **Exeter Road Masterplan**

Estate Regeneration

3665D - LB - MP - 00 - DR - L - 200000 **P2** 

## Illustrative Landscape Masterplan

London Borough of Enfield

Levitt Bernstein

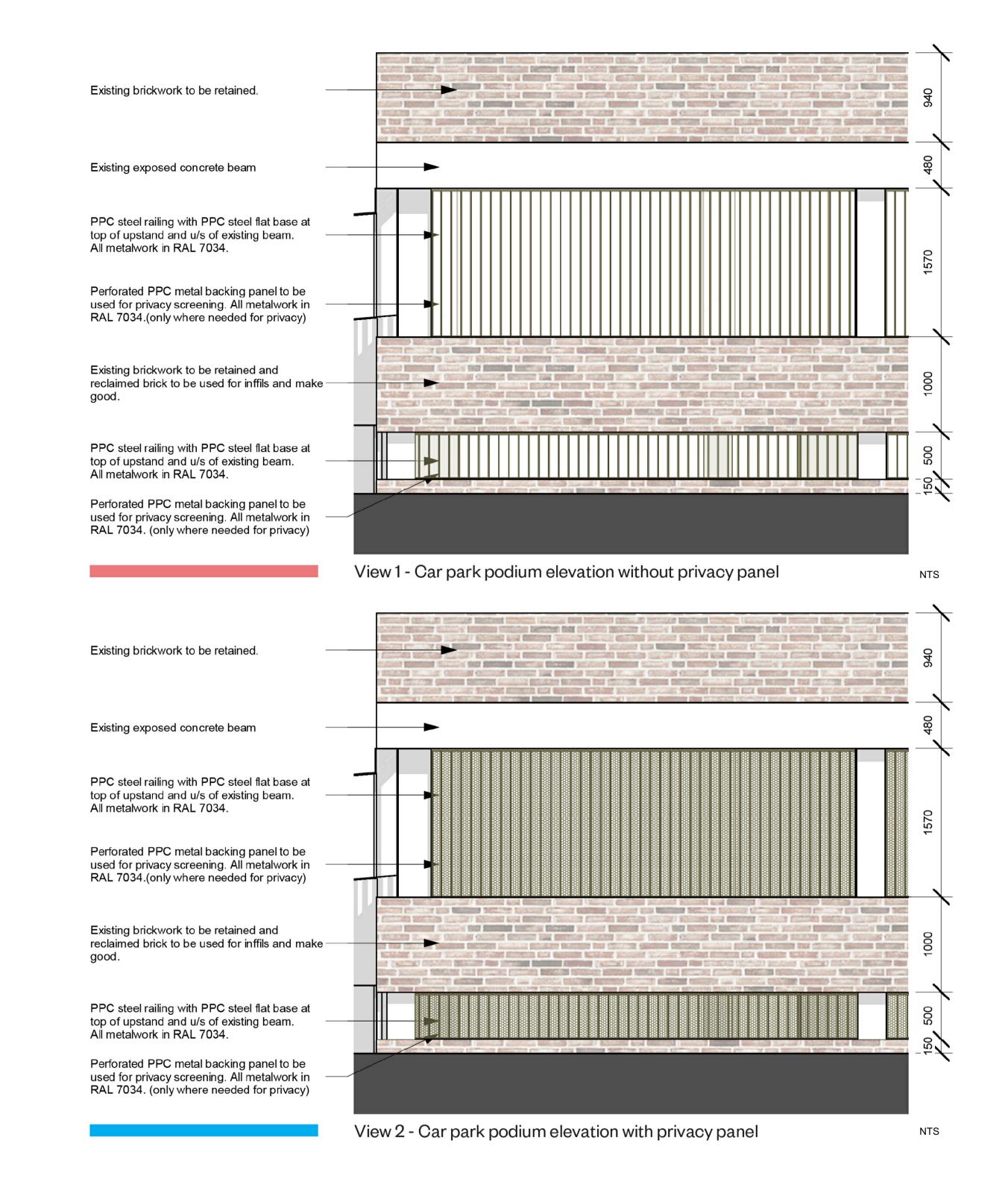
The car park will be opened up for use by residents. The façades will be more transparent to increase natural air flow and perceived security of these spaces.

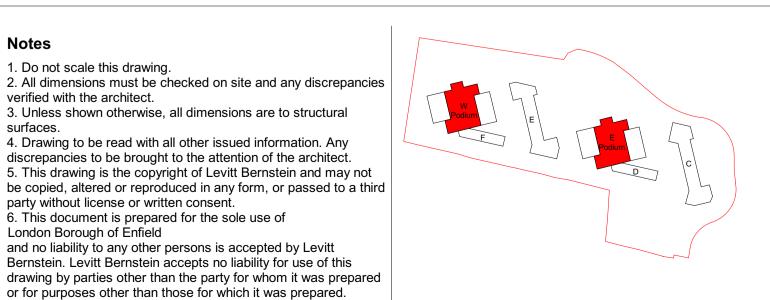
The existing brick infill panels will be replaced with railings, which will be backed with a perforated metal panel in areas where privacy would be compromised.

The existing ramped entrances will be bricked up to match the rest of the elevations, with railings above.

The gated entrance/exit will match the appearance of the rest of the elevation







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P1 04/03/22 Planning Update

Rev Date Description

DP
Drawn / Checked

Project name

**Exeter Road** 

Estate Regeneration

Drawing number Rev

3665D - LB - ZZ - XX - DD - A - 710100 P1

Drawing
East and West Car Park Podium
Typical Elevations

Purpose of issue Suitability Code
Planning

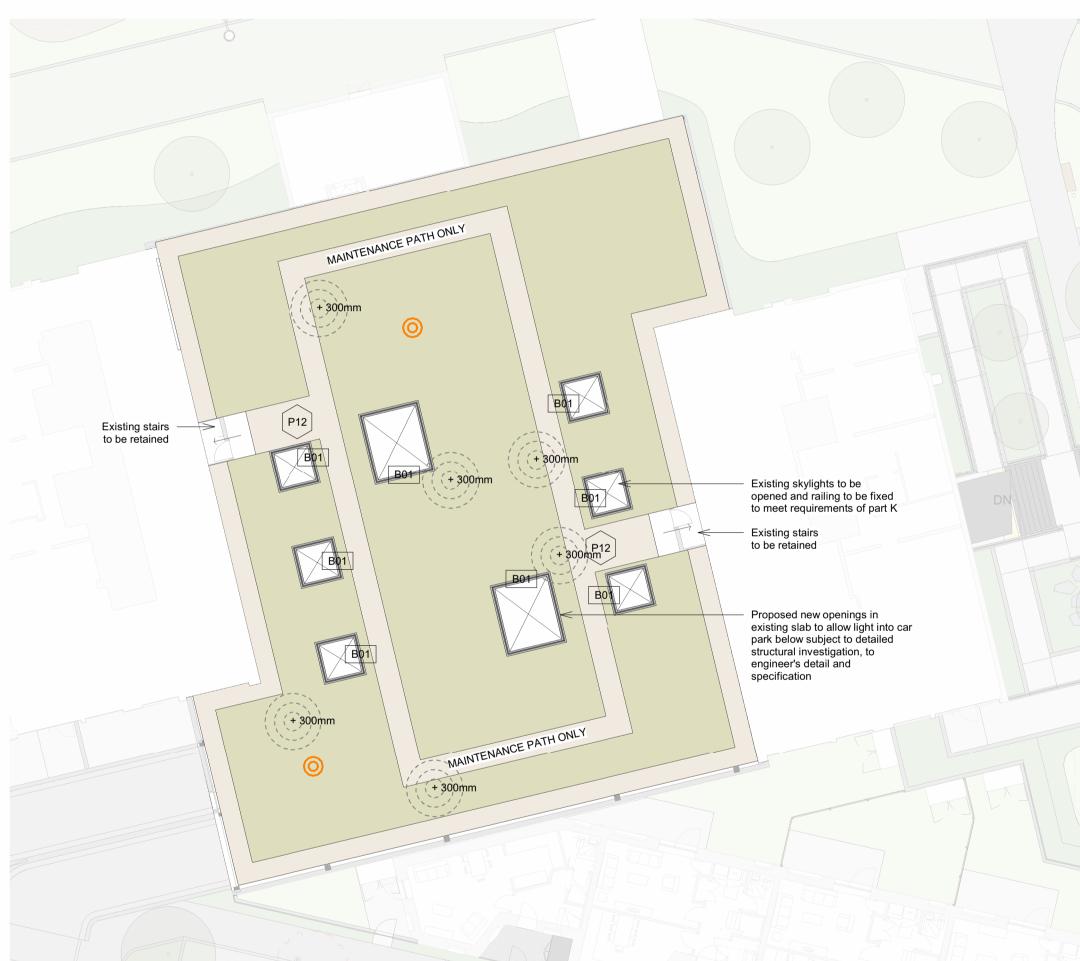
Scale Date
@ A1 03/04/22

Client
London Borough of Enfield

London
Thane Studios
2-4 Thane Villas
London N7 7PA
+44 (0)20 7275 7676

Manchester
Bonded Warehouse
18 Lower Byrom Street
Manchester M3 4AP
+44 (0)16 1669 8740

Levitt Bernstein



1 | Landscape GA - Phase 2 - Podium West 1:200



2 | Landscape GA - Phase 2 - Podium East

Key MOL Boundary + (0.000) Existing Level PROPOSED TREE PLANTING TREE TO BE REMOVED TREE TO BE RETAINED PLANTING
Refer to Planting Plan L-200104 **PLANTING**Biodiverse Green Roof Compacted Self-Binding Gravel Path Breedon or Similar Approved Steel Railing - 1100mm High To Match Architectural Railing HABITAT FEATURE Recessed Bird and Bat Box Installed on Building Facade (as per Ecologist Recommendation) and Log Pile/Insect Hotels within Planting Beds (Where Indicated) NOTE:
- All materials within highway boundary subject to local highways authority approval
- All service and manhole covers to be recessed to allow paved surfaces to be inlaid
- All service and manhole covers to be located in hardstanding when possible
- Roof build-up subject to specialist subcontractor design and detail
- Plans show design intent only, final designs to be subject to detailed structural investigation and detailed engineering advice

discrepancies verified with the architect. 3. Unless shown otherwise, all dimensions are to structural surfaces. 4. Drawing to be read with all other issued information. Any discrepancies to be brought to the attention of the architect. 5. This drawing is the copyright of Levitt Bernstein and may not be copied, altered or reproduced in any form, or passed to a third party without license or written consent. 6. This document is prepared for the sole use of London Borough of Enfield and no liability to any other persons is accepted by Levitt Bernstein. Levitt Bernstein accepts no liability for use of this drawing by parties other than the party for whom it was prepared or for purposes other than those for which it

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Project name **Exeter Road Masterplan** Estate Regeneration Drawing number 3665D - LB - XX - 01 - DR - L - 200005 **P1** Landscape GA - Phase 2&3 -Podiums East and West Purpose of issue Tender

Drawn / Checked

15/10/21

London
Thane Studios
2-4 Thane Villas
London N7 7PA
+44 (0)20 7275 7676

Manchester
Bonded Warehouse
18 Lower Byrom Street
Manchester M3 4AP
+44 (0)161 669 8740

P1 08/12/21 Planning Issue

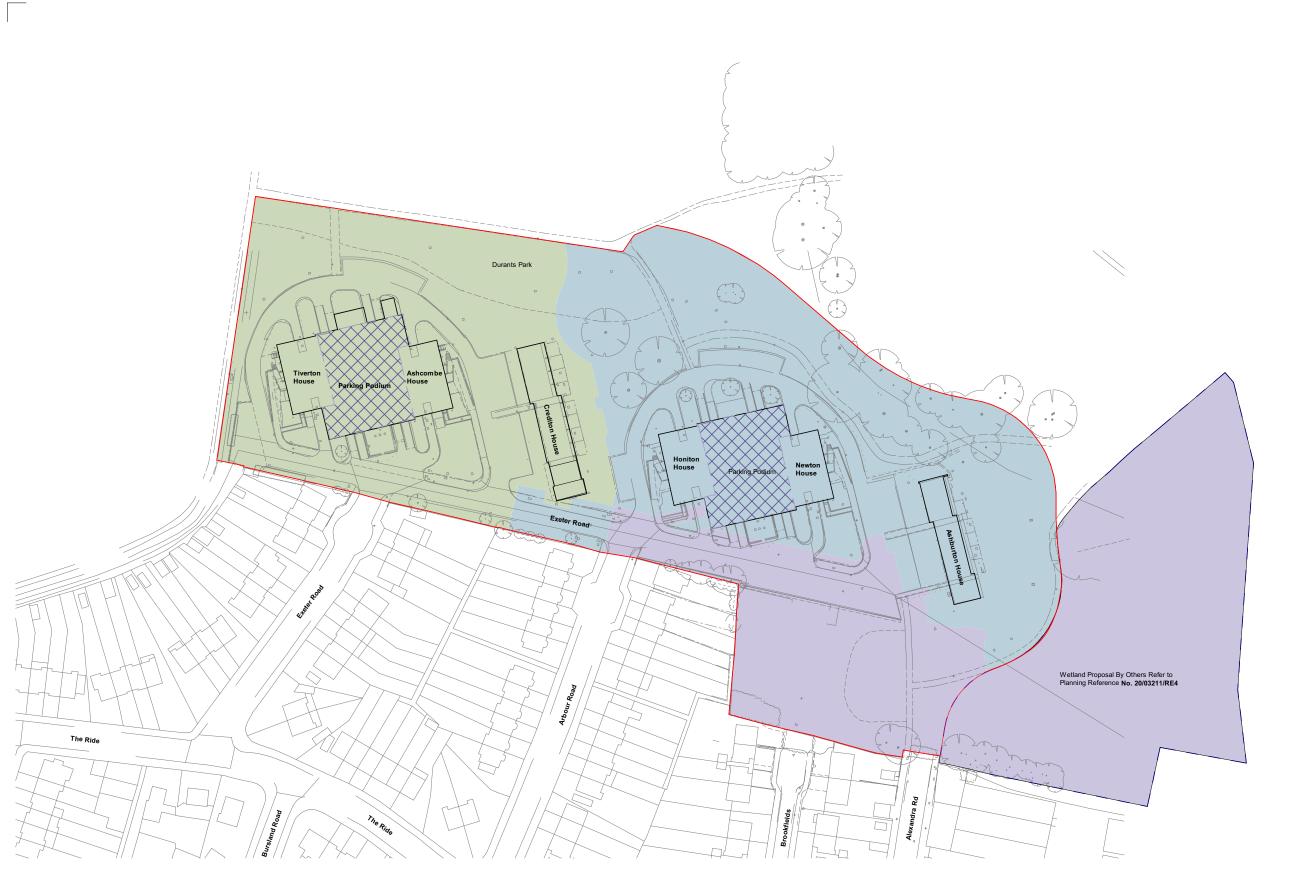
Rev Date

As indicated @ A1

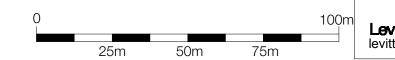
Levitt Bernstein

London Borough of Enfield

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 Site Location Plan 1:1250



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#### KEY:

Site Boundary

– Land within applicant ownership

Phase 1 Detailed Application Area (planning application granted)

Phase 2 Detailed Application Area

Phase 3 Detailed Application Area

Page 202

RF

P1 09/12/21 Planning Submission

Drawn / Checked

Project name

### **Exeter Road**

#### Estate Regeneration

Drawing number

P1

3665D - LB - ZZ - 00 - DP - A - 101000

Drawing

#### Site Location Plan

Purpose of issue

1:1250 @ A3

Client

London Borough of Enfield

# London Thane Studios 2-4 Thane Villas London N7 7PA +44 (0)20 7275 7676

25/05/21

Manchester

Bonded Warehouse 18 Lower Byrom Street Manchester M3 4AP +44 (0)161 669 8740 Levitt Bernstein levittbernstein.co.uk

#### LONDON BOROUGH OF ENFIELD

## PLANNING COMMITTEE

Date: 22<sup>nd</sup> March 2022

Report of: Contact Officers: Ward:

Head of Planning Andy Higham Upper Edmonton Vincent Lacovara Gideon Whittingham

Maria Demetri

**LOCATION:** North Middlesex Hospital, Sterling Way, Edmonton, N18 1QX

**PROPOSAL:** Construction of a 4 level multi storey car park (MSCP) to the north of the site on an existing surface car park comprising up to 452 car parking spaces, to include reconfigured road layout, access, landscaping, disabled parking and electric car charging points.

#### **Applicant Name & Address:**

North Middlesex University Hospital NHS Trust c/o Savills (UK) Limited London United Kingdom

#### Agent Name & Address:

Miss Tara Kemmitt Savills 33 Margaret Street London W1G 0JD

#### **RECOMMENDATION:**

W1G 0JD

- 1. That subject to the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions.
- 2. That the Head of Development Management be granted delegated authority to agree the final wording of the conditions and the Section 106 Agreement to cover the matters in the Recommendation section of this report.

#### 1. Note for Members

1.1 This application is a non-residential development in excess of 1,000 m2. As such, it constitutes a "major" planning application. Under the scheme of delegation for planning applications, detailed applications for the erection of non-residential development (excluding extensions to existing buildings), in excess of 1,000 sq. metres (gross) cannot be determined under delegated authority but are required to be reported to Planning Committee.

#### 2. Executive Summary

- 2.1 This report seeks approval for the construction of a 4 level multi storey car park (MSCP) adjacent to the northern boundary with the A406 North Circular Road] of the North Middlesex Hospital site. It would be sited on an existing surface car park and comprise up to 452 car parking spaces. The proposal also includes reconfigured road layout, access, landscaping, disabled parking and electric car charging points.
- 2.2 The scheme has been subject to extensive discussions and negotiations with the agent and the North Middlesex University Hospital NHS Trust, here on in known as the Trust. Revised plans as detailed in the report were received on the 4<sup>th</sup> February 2022. Additional information has also been submitted. After assessment, on balance, the proposal is considered to be acceptable.
- 2.3 The MSCP facilitates a more efficient use of the site and enables development of land in the south east corner of the site for residential housing. Whilst the residential housing element does not form part of this application, an indicative master plan has been submitted as part of this application providing Members with an understanding of how this application is key to the wider development objectives of the site.
- 2.4 The principle of development has been found to be acceptable. The revised design is deemed to be on balance, acceptable. Traffic and Transport implications have been found to be on balance acceptable, subject to conditions. All other matters have either been resolved or been found to be acceptable subject to the imposition of conditions and the completion of a Section 106 Agreement. Overall, the scheme has therefore been recommended for approval subject to conditions and completion of a Section 106 Agreement.

#### 3. Recommendation

- 3.1 That subject to the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions to cover the following matters:
  - 1. Time Limited Permission

- 2. Development to be carried out in accordance with approved plans and documents.
- 3. Piling method statement (at the request of Thames Water)
- 4. Ground Contamination (at the request of Environmental Health)
- 5. Construction Logistics Plan (at the request of TfL, T&T and Environmental Health)
- 6. Renewable energy details
- 7. SuDS
- 8. Landscaping (soft and hard)
- 9. Access arrangements design
- 10. Cycle parking
- 11. Car parking management plan (update to existing Trust Car Parking policy)
- 12. Disabled parking
- 13. Electric vehicle charging (covers last minute changes)
- 14. Travel Plan (update to existing as required in previous planning consents)
- 15. Details of the zone for public art
- 16. Materials including a sample board
- 3.2 That the Head of Development Management be granted delegated authority to agree the final wording of the conditions and the Section 106 Agreement to cover the matters in the Recommendation section of this report.

#### 4. Site and Surroundings

- 4.1 The site lies within the demise of the North Middlesex University Hospital. The surrounding area is mixed-use comprising primarily residential use to the east and an industrial area / units to the south.
- 4.2 The actual application site comprises an existing surface car park to the north east of the hospital, adjacent to the boundary with the A406. The site also includes a section of parking which sits to the east of the existing maternity building. The existing car park is accessed from the A406 via an established vehicle and pedestrian access into the site.
- 4.3 The site has the following designations / constraints:
  - North Circular Road Opportunity Site
  - Area Action Plan (North Circular Road)
  - Trunk Road Consultation Boundary

#### 5. Proposal

5.1 This is an application for the construction of a 4 level multi storey car park (MSCP) to the north of the site adjacent to the northern boundary of the hospital with the North Circular Road. It would be sited on an existing surface car park and would provide up to 452 car parking spaces. The proposal also includes reconfigured road layout, access, landscaping, disabled parking, and electric car charging points.

#### 6. Relevant Planning Decisions

6.1 <u>21/03593/FUL</u>

Demolition of three buildings to the south of the site to create a temporary surface car park comprising up to 300 parking spaces (150 replaced spaces and existing 150 surface spaces to be retained) and associated access.

This application is to be determined under delegated authority once a decision has been made on the application currently being presented to Members.

#### 6.2 <u>P12-00940PLA</u>

Demolition of redundant hospital buildings and erection of 3-storey building providing accommodation for women's outpatient services, consultant and midwife led birthing units, obstetrics theatres and neonatal units linked to existing building by first floor covered walkway, with associated car parking, landscaping, plant compounds and buildings, and emergency vehicle access via Sterling Way slip road and north eastern site access.

Granted subject to conditions on 20th August 2012

#### 7. Consultation

#### Public Consultation

- 7.1 In accordance with the Enfield Statement of Community Involvement in Planning (2020), consultation on the application involved notification letters being sent to 194 neighbouring properties on 4<sup>th</sup> November 2021, giving them until the 28<sup>th</sup> November 2021 to respond. Further, a site notice was erected, which allowed until the 1<sup>st</sup> December 2021 to respond to. Furthermore, a press notice was advertised, which allowed until the 24<sup>th</sup> November 2021 to respond to.
- 7.2 In total 1 letter of support has been received. The letter of support related to the provision of parking at the North Middlesex Hospital.

#### **External Consultees**

- 7.3 *Thames Water* No objection subject to a condition regarding piling near a strategic sewer and standard informatives.
- 7.4 GLA The application was referred to the GLA. They have advised that the application is not referable and will take no further action on the application. This is because Category 3F of The Town and Country Planning (Mayor of London) Order 2008 still applies. This category relates to "Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use." The GLAs interpretation of this is that it is any development associated with the car park that is referable rather than the car park itself. As the car park in this case is not connected to any other new development serving the hospital, it would not be referable under Category 3F or any other category. The GLA has also advised that TfL will provide separate comments to the LPA.
- 7.5 Natural England No comment to make on this application and has directed the LPA to its standing advice.
- 7.6 *TFL* Reiterate that the safe and free flow of pedestrian, vehicle, including public transport and associated bus stops, and cycle movement on the highway

and off the A406 cannot be impacted by the proposed development in terms of construction. They also reiterate that the proposal and its construction cannot impact Cycle Superhighway 1. They have requested a Construction Logistic Plan be secured via condition that is in line with TfL's best practice guidance.

- 7.6.1 Concern is raised with regards to the number of electric charging points and cycle spaces provided, as well as insufficient information regarding the lighting of the MSCP. Concern is also raised regarding the lack of sustainable travel to the hospital by staff and have requested a staff travel plan to be secured by way of condition.
- 7.6.2 TfL welcome the number of blue badge parking spaces as well as the mode share of staff spaces.
- 7.7 *GLAAS* On the basis of the information provided, they do not consider that it is necessary for this application to be notified to Historic England's Greater London Archaeological Advisory Service under their consultation criteria.

#### Internal Consultees

- 7.8 *Traffic and Transportation* Subject to negotiations and additional information, no objection is raised subject to the imposition of conditions and a Section 106 contribution.
- 7.9 *Environment and Operational Services* The submitted details are lacking regarding SuDS.
- 7.10 Environmental Health No objection subject to the imposition of conditions.
- 7.11 Climate and Sustainability Lead Officer The applicant has not demonstrated that relevant policies have been met to deliver a net-zero building, therefore further review and information is required.
- 7.14 Highway Services The existing footway within the extent of the proposed site plan will need to be assessed for damage during construction and after construction by Highway services and a fee must be taken purely as damage deposit.

#### 8. Relevant Policies

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

#### National Planning Policy Framework

8.1 The National Planning Policy Framework 2021 (NPPF) sets out national planning policy objectives. It introduces a presumption in favour of sustainable development, which is identified as having three dimensions - an economic role, a social role and an environmental role. Other key relevant policy objectives are referred to as appropriate in this report

#### The London Plan 2021

- 8.2 The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:
  - GG1 Building Strong and Inclusive Communities
  - GG2 Making the Best Use of Land
  - GG3 Creating a Healthy City
  - GG6 Increasing efficiency and resilience
  - D1 London's form, character and capacity for growth
  - D4 Delivering Good Design
  - D5 Inclusive Design
  - 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
  - HC1 Heritage Conservation and Growth
  - G5 Urban Greening
  - G6 Biodiversity and Access to Nature
  - G7 Trees and Woodlands
  - SI1 Improving Air Quality
  - SI2 Minimising Greenhouse Gas Emissions
  - SI3 Energy Infrastructure
  - SI4 Managing heat risk
  - SI5 Water infrastructure
  - SI7 Reducing Waste and Supporting the Circular Economy
  - SI 8 Waste capacity and net waste self-sufficiency
  - SI12 Flood Risk Management
  - SI13 Sustainable Drainage
  - T1 Strategic Approach to Transport
  - T2 Healthy Streets
  - T3 Transport Capacity, Connectivity and Safeguarding
  - T4 Assessing and Mitigating Transport Impacts
  - T5 Cycling
  - T6 Car Parking
  - T7 Deliveries, servicing and construction
  - T9 Funding Transport Infrastructure Through Planning
  - DF1 Delivery of the Plan and Planning Obligations

#### <u>Local Plan – Core Strategy (2010</u>

- 8.3 The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the borough is sustainable.
- 8.4 The following local plan Core Strategy policies are considered particularly relevant:
  - CP10 Emergency and Essential Services
  - CP20 Sustainable Energy Use and Energy Infrastructure

CP21	Delivering Sustainable Water Supply, Drainage and Sewerage
	Infrastructure
CP24	The Road Network
CP25	Pedestrians and Cyclists
CP26	Public Transport
CP28	Managing Flood Risk Through Development
CP30	Maintaining and improving the quality of the built and open
	environment
CP32	Pollution
CP46	Infrastructure contributions

#### Local Plan - Development Management Document (2014)

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

DMD 49 Sustainable Design and Construction Statements DMD 50 Environment Assessment Methods DMD 51 Energy Efficiency Standards DMD 52 Decentralised Energy Networks DMD 53 Low and Zero Carbon Technology DMD 56 Heating and Cooling 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 63 Protection and Improvement of Watercourses and Flood Defences
DMD 64 Pollution Control and Assessment
DMD 65 Air Quality DMD 66 Land Contamination and Instability
DMD 66 Land Contamination and Instability DMD 68 Noise
DMD 69 Light Pollution
DMD 70 Water Quality
DMD 79 Ecological Enhancements
DMD 80 Trees on Development Sites
DMD 81 Landscaping

#### **Enfield Draft New Local Plan**

8.6 Enfield Local Plan - Reg 18 Preferred Approach was approved for consultation on 9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. It is Enfield's Emerging Local Plan.

- 8.7 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan, while noting that account needs to be taken of emerging policies and draft site proposals.
- 8.8 Key emerging policies from the plan are listed below:

DM SE2: Sustainable design and construction DM SE3: Whole-life carbon and circular economy

DM SE4: Reducing energy demand

DM SE5: Greenhouse gas emissions and low carbon energy supply

DM SE6: Renewable energy development

DM SE7: Climate change adaptation and managing heat risk

DM SE8: Managing flood risk

DM SE10: Sustainable drainage systems

DM BG3: Biodiversity net gain, rewilding and offsetting

DM DE1: Delivering a well-designed, high quality and resilient

environment

DM DE2: Design process and Design Review Panel

DM DE3: Inclusive design

DM DE4: Putting heritage at the centre of place making DM DE7: Creating liveable, inclusive and quality public realm

DM DE8: Design of premises

DM DE10: Conserving and enhancing heritage assets

DM DE11: Landscape design

#### Other Material Considerations and guidance

8.9 The following guidance is also considered particularly relevant:

North Circular Area Action Plan (2014)

Enfield Climate Action Plan (2020)

Enfield Biodiversity Action Plan

Enfield Local Heritage List (May 2018)

Enfield S106 SPD (2016)

Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)

London Councils: Air Quality and Planning Guidance (2007)

TfL London Cycle Design Standards (2014)

GLA: The Control of Dust and Emissions during Construction and

Demolition SPG (2014)

GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)

Healthy Streets for London (2017)

Manual for Streets 1 & 2, Inclusive Mobility (2005)

National Design Guide (2019)

#### 9. Assessment

- 9.1 The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise.
- 9.2 Running alongside this is the presumption in favour of sustainable development that is at the heart of the National Planning Policy Framework NPPF (paragraph 11). The NPPF (paragraph 120) also advocates the promotion and support of development of under-utilised land and buildings, particularly where

this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.

- 9.3 The main planning issues raised by the proposed development are:
  - Principle of Development
  - Design, local character and heritage
  - Neighbouring Amenity including noise, air and dust
  - Traffic, Highways and Transportation
  - Trees and Landscaping
  - Water Resources, Flood Risk and Drainage
  - Environmental Considerations
  - S106
  - CIL
  - Equalities Impact

#### **Principle of Development**

9.4 The principle of development involving a more intensive parking solution to release other land for development is considered to be acceptable. This is because the existing land is in use as a car park and the proposal seeks to introduce a multi-storey car park. Whilst the principle is accepted, the overall acceptability is dependent on a number of issues pertaining to design, heritage implications, traffic and transport implications and other such issues discussed and addressed within the Committee Report.

#### Design, Local Character and Heritage

#### Policy

9.5 London Plan Policy D1 has regard to local character and states in its overall strategic aim that 'development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings'. Policy D8 of the London Plan outlines a similar aim and seeks for proposals in public places to be 'Secure...easy to understand and maintain, relate to local context, and incorporate the highest quality design'. In terms of design, Core Strategy Policy 30 requires all developments to be high quality and design led, having special regard to their context. Meanwhile Policy DMD 37 seeks to achieve high quality design and requires development to be suitably designed for its intended function that is appropriate to its context and surroundings. The policy also notes that development should capitalise on opportunities to improve an area and sets out urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability, and diversity.

#### Design

9.6 The site is located at a key entrance to the Hospital where pedestrians arrive from Silver Street station and an underpass that allows for pedestrian access from the north under the North Circular Road. This is a busy pedestrian route and therefore an important arrival point for the Hospital. The current entrance arrangement is unattractive with poor quality public realm due to it being adjacent to the North Circular Road, a dominant amount of surface car parks and an indirect route to the entrance of the hospital. This creates an unpleasant and confusing pedestrian experience. The proposals would address this and the new street layout is supported. It clearly follows pedestrian desire lines

allowing a clear route to the entrance of the hospital without crossing main vehicle routes (apart from the shared surface street) going towards the car park. It is understood that the shared surface route is only to be used by emergency vehicles and therefore will be less heavily trafficked than the entrances to the MSCP. The new car park entrance arrangement is supported, with a vehicle entrance located at both the east and west sides of the building. This allows more space for public realm to the east and makes efficient use of the service road running along the north of the site. Fundamentally the location of the car park within the hospital site is appropriate given the excellent access to the North Circular and the reduction in traffic on back streets roads that the relocation will allow.

- 9.7 At the request of Officers, an active frontage to the east side of the car park was explored. Options explored included, a managers office, a shop or a café but these were not supported by the Trust. However, it has been agreed that a zone for public art would be an appropriate approach to this elevation. This zone for public art has now been incorporated into the revised submission and is welcomed by the local planning authority.
- 9.8 The frontage along the North Circular Road and adjacent to other taller buildings on site allows scope for the car park to have height. The current 4 storey height, scale and massing is thus supported particularly as the MSCP is lower than the tower block on the site. The MSCP is proposed primarily to provide staff car parking and visitor parking for the maternity ward which is adjacent. With this in mind, any substantial advertising on the MSCP has been avoided to ensure that it is clear that the MSCP is not the main entrance into the hospital.
- 9.9 The darker green shown in the updated drawings is a marked improvement from the original proposals. The idea to create a backdrop to the greenery in Pymmes park is welcome as is the idea of introducing colour to an otherwise overwhelmingly grey environment. The colour changes to the cores to a subtler "oyster grey" is also welcome. The use of the proposed Kalzip product is also an improvement. This perforated metal panel system appears to create a coloured but transparent effect although the final choice of perforation must allow visual permeance and not create a flat façade. Final choice of materials will be secured by condition.
- 9.10 It is considered that the use of "oyster grey" picks up on some of the surrounding buildings in terms of colour palette and the perforated mesh will remain a darker green. The design rational is for the MSCP to blend in with the existing (and future proposed) buildings of the hospital and also the surrounding SuD's landscaping and the green of Pymmes Park. The green colour has also been chosen as a restful and quiet colour, which symbolises nature when viewed from the maternity ward, with the aim of diffusing anxiety and helping new parents and NHS workers stay calm and refreshed. The strategically placed planting to the front and side elevation will introduce a further green / brown natural palate to ensure that the dark green is assimilated into the environment it is situated in.
- 9.11 The submission has been subject to extensive discussions and whilst there could be further improvements made in terms of the finer details, it is considered that on balance, there is no objection to the design approach to the scheme.

#### Heritage and policy background

- 9.12 Paragraph 195 of the NPPF requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting its setting), taking account of the available evidence and any necessary expertise (i.e. statutory and non statutory consultees). Paragraph 189 of the NPPF states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. That assessment should then be taken into account when considering the impact of the proposal on the heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 9.13 Paragraph 194 to 197 of the NPPF provides that in determining planning applications affecting heritage assets, local planning authorities should take account of:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 9.14 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'.
- 9.15 With regard to non-designated heritage assets, paragraph 203 of the NPPF advises that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Unlike paragraphs 195-197 and 2001-202, paragraph 203 does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter. It requires a balanced judgement to be made by the decision maker, as set by Nathalie Lieven QC in the Dorothy Bohm v SSCLG ([2017] EWHC 3217 (Admin)).
- 9.16 London Plan Policy HC1 'Heritage conservation and growth' states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The London Plan outlines that heritage assets are valued components of the historic environment. They include buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of historic significance meriting consideration in

planning decisions. They include both designated heritage assets and nondesignated assets where these have been identified by the local authority (including local listing) during the process of decision-making or plan making.

9.17 Core Policy 31 (Built and Landscape Heritage) requires that special regard be had to the impacts of development on heritage assets and their settings, whilst Core Policy 30 supports high-quality and design-led public realm. DMD 44 (Preserving and Enhancing Heritage Assets) requires that developments should conserve and enhance the special interest, significance or setting of a heritage asset. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) outlines the positive approach to managing heritage.

Listed Wall and Non Designated Heritage Asset

9.18 Pymmes Park on Victoria Road, has been included on Enfield's Local Heritage List as a non-designated heritage asset since 2018. The significance is stated as Age, Historic Association, Designed Landscape and Social Value. The description is as follows:

Pymmes takes its name from a 14th century land owner, William Pymme. The Cecil family were owners in the 16th and 17th century. Robert Cecil is believed to have spent his honeymoon there in 1589. The house was rebuilt in the 18th century and let out to tenants through the 19th. Edmonton Council acquired a short lease on the park and opened the first section to the public in 1897. They later negotiated the purchase of both house and park and officially opened the park in June 1906. The house burned down in 1940. Pymmes Brook runs through the park and the lake is an enlargement of the 19th century original. An "old English garden" was created out of the walled kitchen garden. The walls are Grade II listed. Lottery funding in 1996 enable restoration of the gardens and other improvements. A drinking fountain, originally located in Angel Road, was removed to Pymmes Park in the 1920s and was restored in 1993.

- 9.19 The Former Garden Walls in Pymmes Park on Silver Street have been Grade II Listed since the mid 1970s (entry number 1079502). English Heritage official list of entry describe the walls as "Late C17 or early C18 tall red brick walls with convex top slope to flat coping. They run round 3 sides of a garden and are all that remain of the original house and outbuildings in the park".
- 9.20 Pymmes Park is situated to the north east of the site, on the opposite side of the North Circular Road (A406): a main arterial route. Nevertheless, it means the proposed MSCP would be within the setting of the Listed Wall and the non-designated heritage asset. The Heritage Officer has advised that it is unclear how the Wall or the Park influenced the design of the MSCP and there have been no verified views provided from the park to demonstrate the visual prominence of the proposed car park in winter, in summer and at night making it difficult to assess in detail whether the development would harm the Grade II Listed Wall or the park as a non designated heritage asset.
- 9.21 It is prudent to note that the MSCP sits to the front of the tower block which is the most visible building from the wider area and in particular, when viewed from Pymmes Park. In addition, to the front of the site is Sterling Way, between the site and the heritage assets is the A406 and Silver Street. The MSCP would introduce a 4 storey structure to the front of the site, which would not only break up the tower block elevation but also add a green screen as a buffer. The green screen would not only come from strategically placed trees and landscaping,

but also the colour of the multi storey car park. Originally as submitted the green colour appeared too unnatural. The shade of green was revised to be darker thus giving it a more natural shade of green akin to the greening in Pymmes Park. This has been reflected in updated CGI's and it is thus considered that the MSCP would have a neutral impact to the setting of the Listed Wall and Non-Designated Heritage Asset not only due to the context it is situated in but also because the design approach has been well thought out. In this regard, it is considered that the harm to the heritage assets is less than substantial and outweighed by the public benefits of this investment in the hospital and the release of land for new housing including affordable housing, in the south east corner of the site.

#### Other

9.22 It should also be noted that the alteration of the former Infirmary of the Edmonton Union Workhouse is to occur under the accompanying application to be determined under delegated authority (ref: 21/03593/FUL). Although not listed or officially identified as a non designated heritage asset, it has been assessed as such. An assessment undertaken in connection with the proposal to demolish three existing buildings on site (ref: ref: 21/03593/FUL) raises no objection to the alteration of this building as part of these works to accommodate a temporary car park necessary to facilitate the implementation of this development.

# **Neighbouring Amenity**

9.23 London Plan Policy D6 states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Meanwhile, at a local level, Policy CP30 of the Core Strategy seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Secondly, policies DMD6 and DMD8 of the Development Management Document seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

#### Noise and Disturbance

- 9.24 Guidance relevant for the assessment of noise affecting new developments is given in the National Planning Policy Framework (NPPF). This sets out 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'.
- 9.25 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,... 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 and seek to ensure developments appropriately deal with the issue of noise and any noise mitigation.

9.26 The proposal would result in a MSCP to replace the existing surface level car parking. In this respect, noise would still be generated but of no greater detriment than the existing arrangement. In addition, it is recognised that there is the potential for some level of light pollution arising from the development, however, given its siting on the site, and against the back drop of the wider hospital site, it is unlikely to be detrimental to existing residents to the east. Further, it is considered the temporary effects of construction dust and noise can be appropriately managed by the imposition of a condition.

Privacy, Overlooking and Outlook

9.27 Given the siting of the proposal and relationship to neighbouring residential properties, it is considered unlikely to cause harm to residential amenity in terms of sunlight, daylight, outlook and privacy.

# **Traffic, Highways and Transportation**

**Policy** 

- 9.28 The London Plan Policy T1 and the Mayor's Transport Strategy sets out an ambition for 80% of journeys to be made by sustainable transport modes that is by foot, cycle or public transport by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 9.29 London Plan Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 9.30 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.

## Staff Travel Arrangements Survey

- 9.31 A survey was undertaken to understand current and pre-pandemic staff travel patterns with 500 staff responding with a summary of the results below:
  - 69% work set hours.
  - 70% work during "core hours" of 08:00 to 18:00.
  - 39% of staff pre-pandemic were a car driver as their main mode of transport.
  - 62% park on the hospital site.
  - Previous research also indicated that a high proportion of staff arrive in the AM peak.
- 9.32 Overall around 3,600 staff work on the site with 46% living in easy walking and cycling distance (less than 5km), which roughly corresponds with the percentage of staff using active and sustainable modes (47%). The Transport Assessment does highlight that only 400 car parking spaces are available so the remaining 3,200 must be using other modes. However, this does not take into account shift workers (21% of staff) or the high proportion who are car drivers but do not park onsite (38%). It also identifies opportunities to increase the use of active and sustainable travel, which is welcome and aligns with the Trust Green Travel Plan.
- 9.33 It is noted that the hospital administration have to balance factors such as staff recruitment and retention, alongside the health impacts of vehicle based travel and the disruptive nature of overspill parking. Given that there will be further reviews of hospital operations and staffing, including increasing numbers alongside moving to a wider community provision offer, it is assumed that staff numbers will be broadly similar in future years. There is reference in the Trust Car Parking Policy to the over-allocation of car parking permits for staff and the high demand, although there does not appear to be any information in the Transport Assessment as to the current level of over-allocation or the number of staff on a parking waiting list.

# Parking Utilisation

9.34 Data has been provided that looks at peak utilisation of the car parking areas. However, it appears that the information relates to the average number of visits per day rather than the average utilisation of spaces. The data included in Appendix C of the submitted Transport Assessment was provided by the Trust's car parking management company and relates to the use of the visitor's car park only. The ANPR system was introduced during the Covid pandemic. Enquiries were made as to the availability of more detailed information related to staff use, however, this information cannot be ascertained.

## Quantum of Car Parking

9.35 Currently the wider site provides parking for 787 vehicles. Around 5.7% of spaces are allocated for disabled bays and 43% for visitors, which means over 50% are used by staff. The breakdown of these parking spaces are demonstrated below:

Zone	Car Park Use	Staff	Blue Badge	Visitor	Total
CP1	Maternity staff	113	6	0	119
CP2	Maternity staff/visitor	51	8	50	109
CP3	Administration staff	47	0	0	47
CP4	Administration staff	65	4	0	69
CP5	Visitor	0	0	40	40
CP6	Mortuary staff	65	3	0	68
CP7	Main hospital entrance visitor	0	21	248	269
CP8	Energy centre staff	63	3	0	66
Total		404	45	338	787

- 9.36 The proposal is for the existing level of parking to be re-provided via the existing visitor car parks (335 spaces) and the new MSCP (452 spaces). Given the London Plan and Mayor's Transport Strategy are clear about the need for an increase in the use of active and sustainable travel, such an approach needs to be supported by mitigation measures which over time reduce private vehicle trips as a proportion of all trips.
- 9.37 The Transport Assessment does set out a case for re-provision based on current over-utilisation. The agent has advised that the proposal is to reprovide the current level of parking via the existing visitor car parks and the new MSCP. Travel Plan measures will be introduced to encourage an increase in the use of active and sustainable travel in line with the London Plan and Mayor's Transport Strategy which over time will reduce private vehicle trips as a proportion of all trips.
- 9.38 Some spaces within the MSCP will be allocated for Visitor use. These will be controlled using the ANPR system that differentiates staff and visitors. It should be appreciated that this would be primarily to replace current visitor spaces on the east side of the campus that would be lost, namely CP2 which is the maternity unit car park that is only for the use of maternity unit service users and CP5 which is the anti-coagulant blood tests clinic car park which only has a few short stay parking spaces and is for clinic users only and for drop off. It is important to note that the MSCP will not be signposted for general public use. CP7, on the west side of the campus and access from Bull Lane, is the main car park for A&E, outpatients and all services except maternity unit services. This will remain the position after the development.
- 9.39 TfL has advised that they have concerns that the re-provision of the full 452 car parking spaces, with a current staff travel mode shift of 43% using cars, is not in line with the Mayors Transport Strategy and undermines it. However, the Councils Transport Officer advises that the proposal provides no more car parking than currently exists, thus the mode share of 11-12% will be unchanged. The Trust has managed active travel and encouraged more sustainable patterns of travel and will continue to do this into the future through Travel Plan initiatives, for example a new bus route past the hospital has been introduced and promoted by the Trust.
- 9.40 The Design and Access statement also sets out proposed levels of disabled parking provision which is not only welcomed by the Transport Officer but also

TFL. The Council's Transport Officer has advised that this should be reviewed regularly and as part of the wider Car Parking Management Plan. It is also noted that a Trust Car Parking Policy has been appended to the Transport Assessment. The Transport Assessment section 2.7.3 notes that the "car parking management plan will be extended to include the temporary car park and the subsequent multi storey car park". This will need to be amended to take into account any changes arising from the changes to the configuration of car parking onsite. This can be secured by way of a condition.

# Quantum of Cycle Parking

9.41 There is a dedicated sheltered space for parking bicycles located at the front of the hospital with some 20 stands. Additionally, there are a few spaces at the entrance to the Tower Block. These will remain unchanged as they are not related to the MSCP. TfL have requested the provision of 180 cycle spaces. The Transport Assessment notes that 12 cycle stands for 24 cycles will be provided in the MSCP (at ground floor level according to the Design and Access statement) mainly to facilitate car share and mixed mode travel. The provision of 24 cycle spaces appears to be a reasonable number of spaces given that there is no new hospital development and there are no formal or informal cycle parking stands in the existing car parks being removed. In essence therefore, there is no new development creating a demand for additional cycle parking nor is there a need to re-provide. Taking account of the Trusts on going initiatives to promote sustainable transport modes and the fact that the Trust through existing Travel Plan initiatives is working closely with the Council to provide more cycle parking spaces on campus, it is considered the proposed level of cycle parking is acceptable.

# Electric Vehicle Charging

9.42 The applicant has stated that electric charging infrastructure would be provided for 20% of parking spaces which would be phased with 10% initial provision and the remainder at an agreed trigger level. TFL have advised that whilst they acknowledge there is no specific requirement regarding EVCs at hospitals, they would like to see a higher percentage. The agent and the Council's Transport Officer have advised that the London Plan Policy does not have a relevant policy to the employment use of the hospital. Consequently, a pragmatic approach has been taken by the Council and it is considered that the proposed provision is acceptable. It should also be noted, that the submitted Transport Assessment advises that the Trust will undertake a review in 3 years to assess the use and demand with the aim of increasing the number of charging points accordingly.

## Impact of lighting to the A406

9.43 The Hospital is already externally lit for safety and wayfinding. Externally the MSCP scheme will continue the existing lighting strategy that exists upon campus. This includes lighting columns on pavements and road edges as appropriate. Internally the MSCP will be lit by suspended lighting gantries in the main body of the car park, the core and within the lifts. These lights will be level controlled and have movement sensors. Additionally, the MSCP is naturally ventilated so there will be a level of internal lighting during daylight hours.

#### Overall

9.44 Whilst TFLs comments are noted, it is considered that the traffic and transport implications raised by this scheme are, on balance, acceptable. A pragmatic approach has been taken by the LPA with the main material consideration, being that the MSCP is a re-provision of existing car parking spaces to enable the residential development to the south of the site. This is subject to conditions. Whilst it would have been preferable to have a reduced number of car parking spaces across the site, there is scope for the reduction of staff parking spaces and their replacement with cycle spaces over time, with updated Travel Plans and the Trusts own Trusts Car Parking Policy. In this regard, no objection is raised.

# Trees and Landscaping

- 9.45 Policy G7 of the London Plan 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. At a local level, 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.
- 9.46 Trees are being strategically planted to the front and side of the MSCP facing the A406. The trees aid in assimilating the building and in creating a backdrop to the greenery in Pymmes park in a location otherwise devoid of landscaping. The landscaping details have not been developed and would need to be secured by condition. Details would also need to include a planting plan / schedule and a landscaping specification including a scheme of aftercare and maintenance. The proposal is considered to be acceptable in line with relevant policies including Enfield Policies DMD80 and DMD81 of the Development Management Document and Policy G7 of the London Plan.

# Flooding and Drainage

9.47 London Plan Policies SI12 and SI13 require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 confirms the Council's approach to flood risk, inclusive of the requirement for SuDS in all developments. Policy DMD59 confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere and that planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in unacceptable levels of flood risk on site or increase the level of flood risk to third parties. Policy DMD 61 requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates. Policy DMD61 of the Enfield Development Management Document requires that all major developments must maximise the use of SuDS in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management Train.

9.48 The submission includes a Drainage Strategy. The Drainage consultant and the Council's Engineering team have been discussing the submission. The Engineering Officers latest comments advise that the shortfalls of the submission relate to missing or insufficient information. These outstanding matters can be secured by way of a condition and thus no objection is raised to this element of the scheme 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.

## **Energy and Sustainability**

- 9.49 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.
- 9.50 Policy SI2 of the London Plan sets a target for all development to achieve net zero carbon following the energy hierarchy, minimising both regulated and unregulated carbon and maximising opportunities for renewable energy. The Councils Climate Action and Sustainability Lead Officer has revised the submitted Energy Statement by ARUP (dated October 2021) and has advised that the submission has not demonstrated that relevant policies have been met to deliver a net-zero building. The Councils Climate Action and Sustainability Lead Officer advises that the applicant has discounted the provision of any on site solar PV. The applicant has advised that the use of solar PV is not suitable however no evidence has been submitted to demonstrate whether solar PV is technically feasible or economically viable.
- 9.51 The applicant has acknowledged that the MSCP roof would be an appropriate location for the provision of PV's and has confirmed that it is the Trusts intention to provide PV's in this location at a later date. The roof structure and load bearing facility are capable of supporting PV's in the future and the MSCP has been designed to incorporate this infrastructure. However the provision of PV's at the current time is limited by the budget that is available to the Trust to build the MSCP in order to enable the residential development to the south of the site.
- 9.52 In addition to the above, it should also be noted that the Trust has a sustainability budget but this has already been allocated and/or spent for this year. However, they have stated that some/all of this could be allocated to PVs for a particular future year as required.
- 9.53 Given the budget constraints of the proposal and the fact that this site is enabling development elsewhere on the site, it is considered that on balance, the proposed approach to energy on the site is acceptable. The agents have advised that there is an opportunity to impose a time trigger condition for the delivery of PVs and ensure that the opportunity for renewable energy production at the MSCP has been maximised. This condition has been imposed.

Fire Strategy

9.54 A plan indicating the access routes for fire appliances has been provided and demonstrates the development will provide suitable access for fire appliances and incorporate appropriate fire control measures.

## **Section 106 (S106)**

- 9.55 The NPPF (para.57) states that planning obligations must only be sought where they meet all of the following tests:
  - 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.
- 9.56 Traffic and Transportation have requested a sum of £30,000 to be secured through a Section 106 Agreement to be applied towards works in the vicinity of the site which would support active and sustainable transport. However, the Trust has advised that there is no budget for the £30,000 request. In addition to the funding, the agents have also advised that as the MSCP does not propose new development, it would not have an impact to the surrounding area that would require the funding for mitigation.
- 9.57 The MSCP is re-providing the existing car parking that is already on site in one location, rather than having it spread out. Whilst the building itself is 'new' the level of car parking proposed remains the same and the agent does not consider there are any identified impacts of development that need to be mitigated against. The LPA does not accept this argument as the MSCP reconfigures the primary access point to the north of the site, which will exacerbate an already very poor quality user experience for staff and members of the community walking or cycling to the hospital. However, in the interest of the Council's commitment to delivering sustainable transport enhancements, which in turn will support the Trust to deliver against its own sustainable travel plan targets, a contribution of £15,000 has been requested. Officers have also requested an Employment Skills Strategy to be submitted and secured by way of a Section 106 Agreement. The agent has confirmed its commitment to contribute £15,000 and provide an Employment Skills Strategy for the construction of the MSCP which is to be secured by way of a Section 106 Agreement.

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

9.58 There will be a net increase in floor space and therefore such schemes would typically be liable to the both Enfield and Mayoral CIL. The applicant considers the development is not CIL liable given the nature of development however while there would be no charge for Enfield CIL, it is considered there would be a Mayoral CIL charge calculated at £60 per sqm. This remains under discussion

## **Equalities Impact**

9.59 In line with the Public Sector Equality Duty the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when

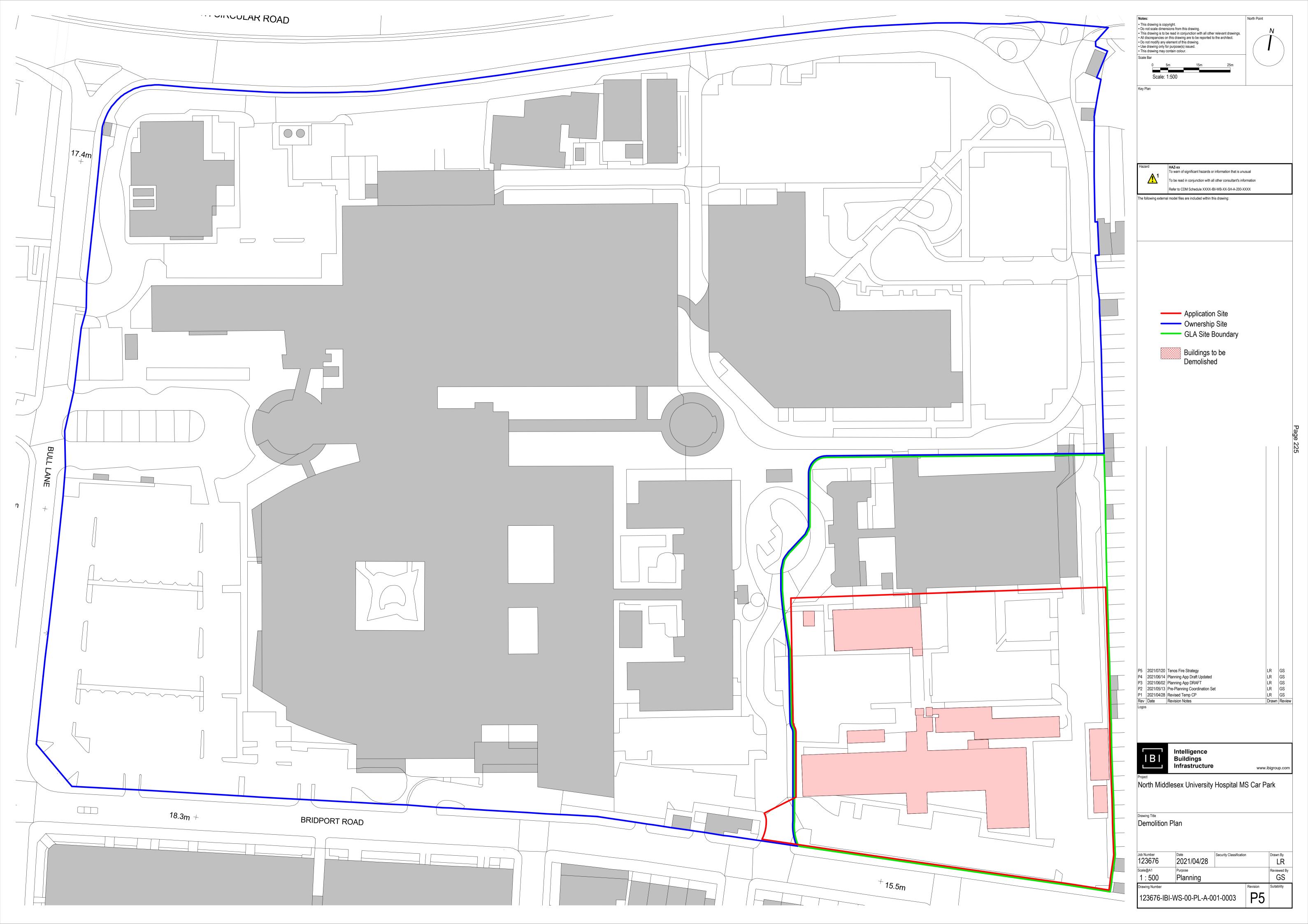
exercising their functions including decision making on planning applications. These considerations include: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

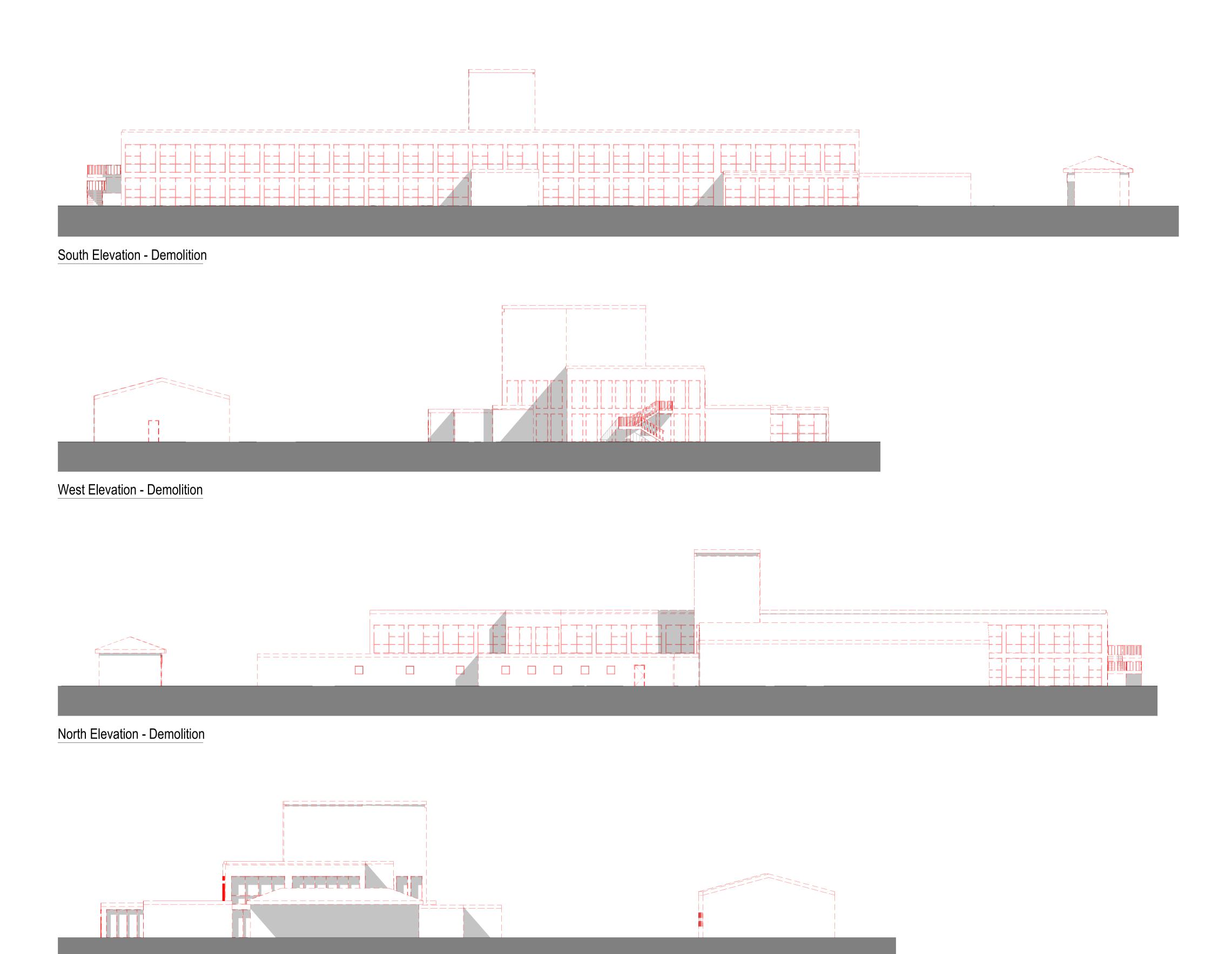
- 9.60 The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above. In making this recommendation, due regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, marriage / civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).
- 9.61 When determining the planning application (and thereby accounting for the representations resulting from public consultation), the Council has considered the potential effects of the proposed development on those with protected characteristics as defined under the Equality Act 2010. In doing this, the Council has had due regard to equality considerations and attribute appropriate weight to such considerations. In providing the recommendation to Members that planning consent should be granted, officers have considered equalities impacts in the balance, alongside the benefits arising from the proposed development. The Council has also considered appropriate mitigation to minimise the potential effects of the proposed development on those with protected characteristics.
- 9.62 There are no statutory or regulatory requirements for the form or content of an equalities assessment. The scale and significance of such impacts cannot always be quantified, and it is common to address this through descriptive analysis of impacts and identifying whether such impacts are adverse or beneficial. The key elements of the Proposed Development which have an impact that could result in an equalities effect include the design and physical characteristics of the proposals subject to the planning application. Officers do not consider there would be a disproportionate equalities effect.

## 10. Conclusion

10.1 It is acknowledged and recognised throughout this report, that consideration of this proposal has involved balanced judgements. Concessions have been made in the consideration of the proposal, in order to enable the residential development of the south of the site, which will lead to a considerable addition to contributing to the Borough's challenging housing delivery targets. Overall, it is concluded that the development for reasons set-out within this report broadly accords with the adopted policy framework as well as relevant emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule and the conclusion of a Section 106 Agreement to secure the matters referred to in this report, the application is recommended for approval.







East Elevation - Demolition

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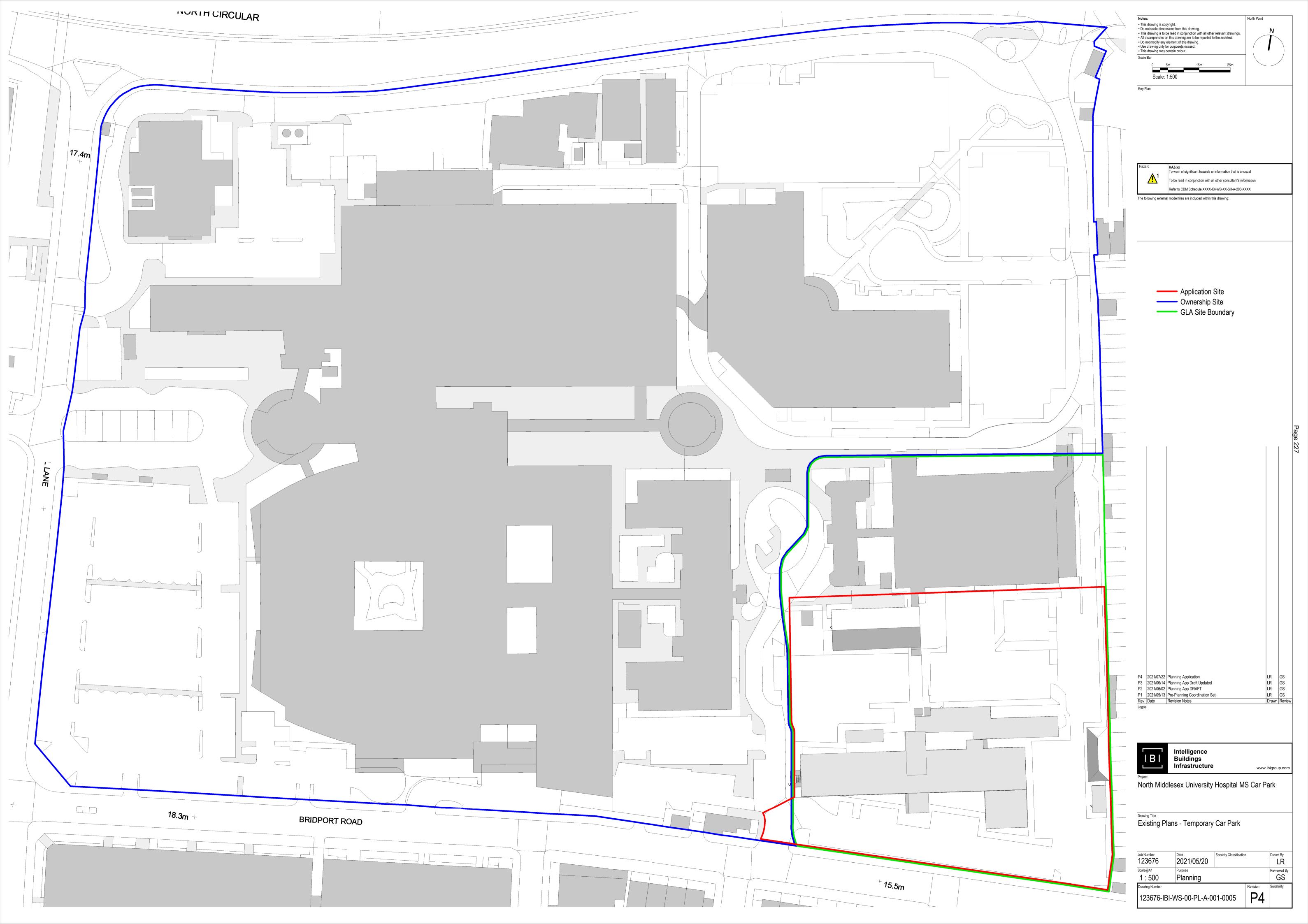
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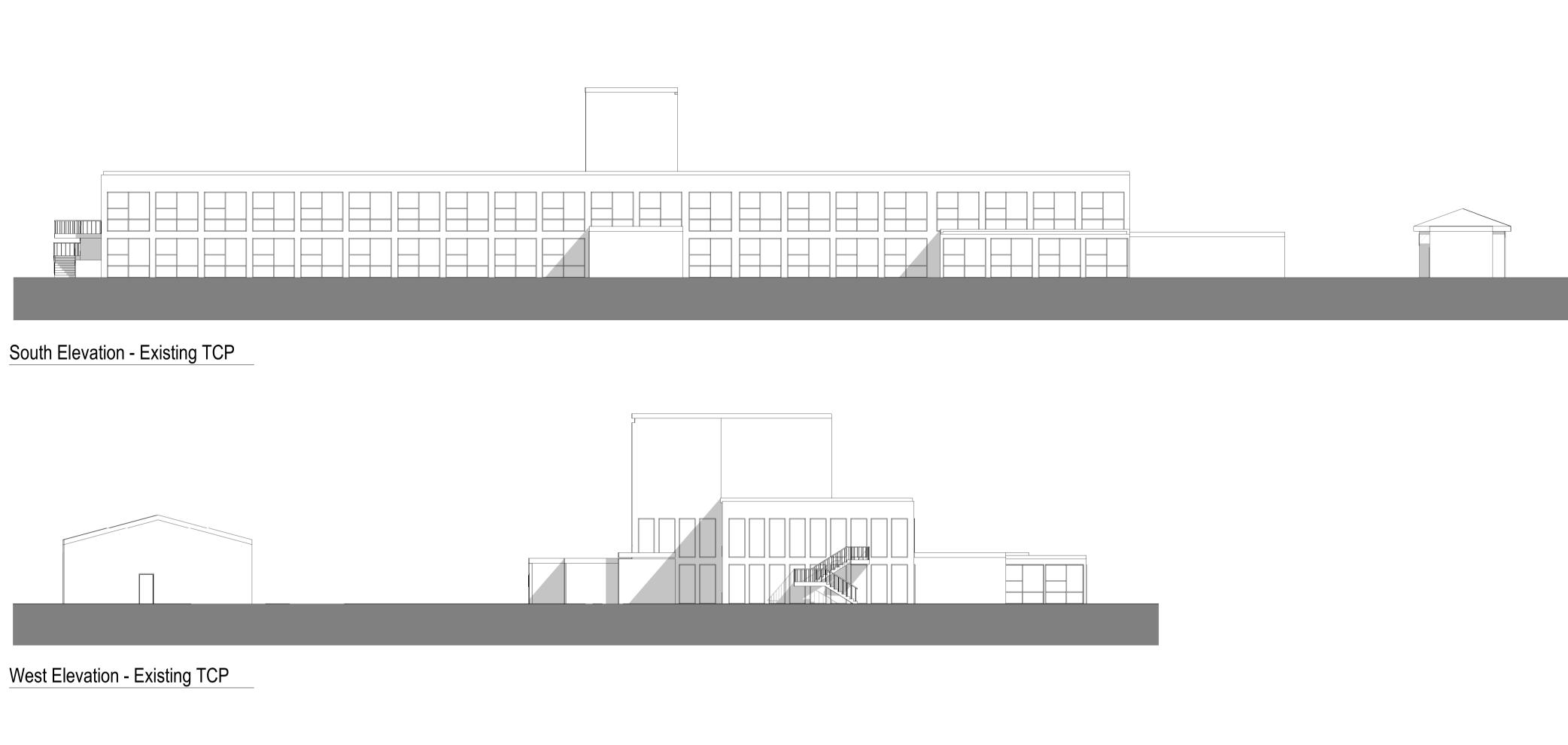
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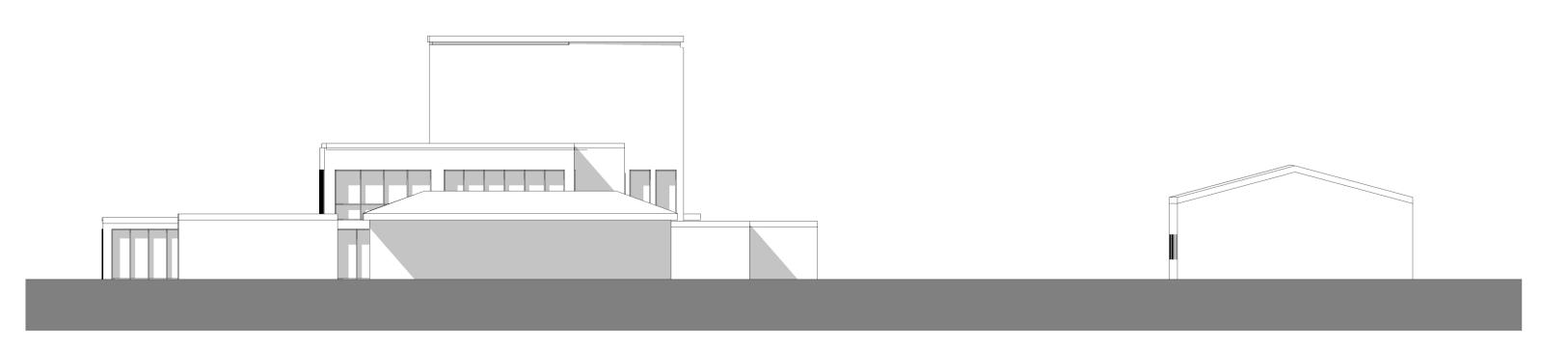
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To warn of significant hazards or information that is unusual To be read in conjunction with all other consultant's information Refer to CDM Schedule XXXX-IBI-WB-XX-SH-A-200-XXXX The following external model files are included within this drawing: P4 2021/07/22 Planning Application
P2 2021/06/02 Planning App Draft Updated
P3 2021/06/02 Planning App DRAFT LR GS
LR GS
LR GS
LR GS
Drawn Review P1 2021/04/28 Revised Temp CP
Rev Date Revision Notes Intelligence Buildings Infrastructure www.ibigroup.com North Middlesex University Hospital MS Car Park Drawing Title
Demolition Elevations Drawn By Job Number 123676 Date 2021/05/07 Reviewed By 1:200 Planning 123676-IBI-WS-00-PL-A-001-0004



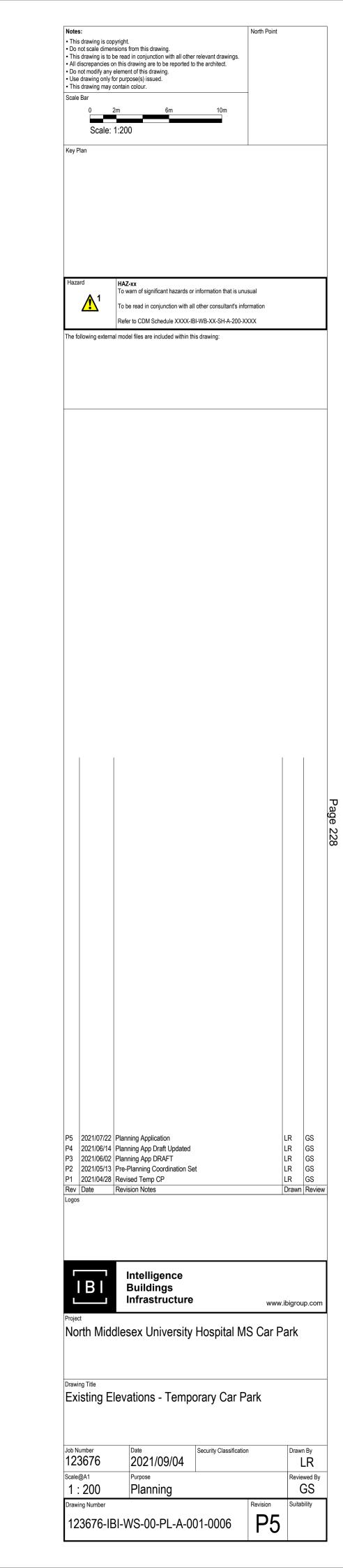


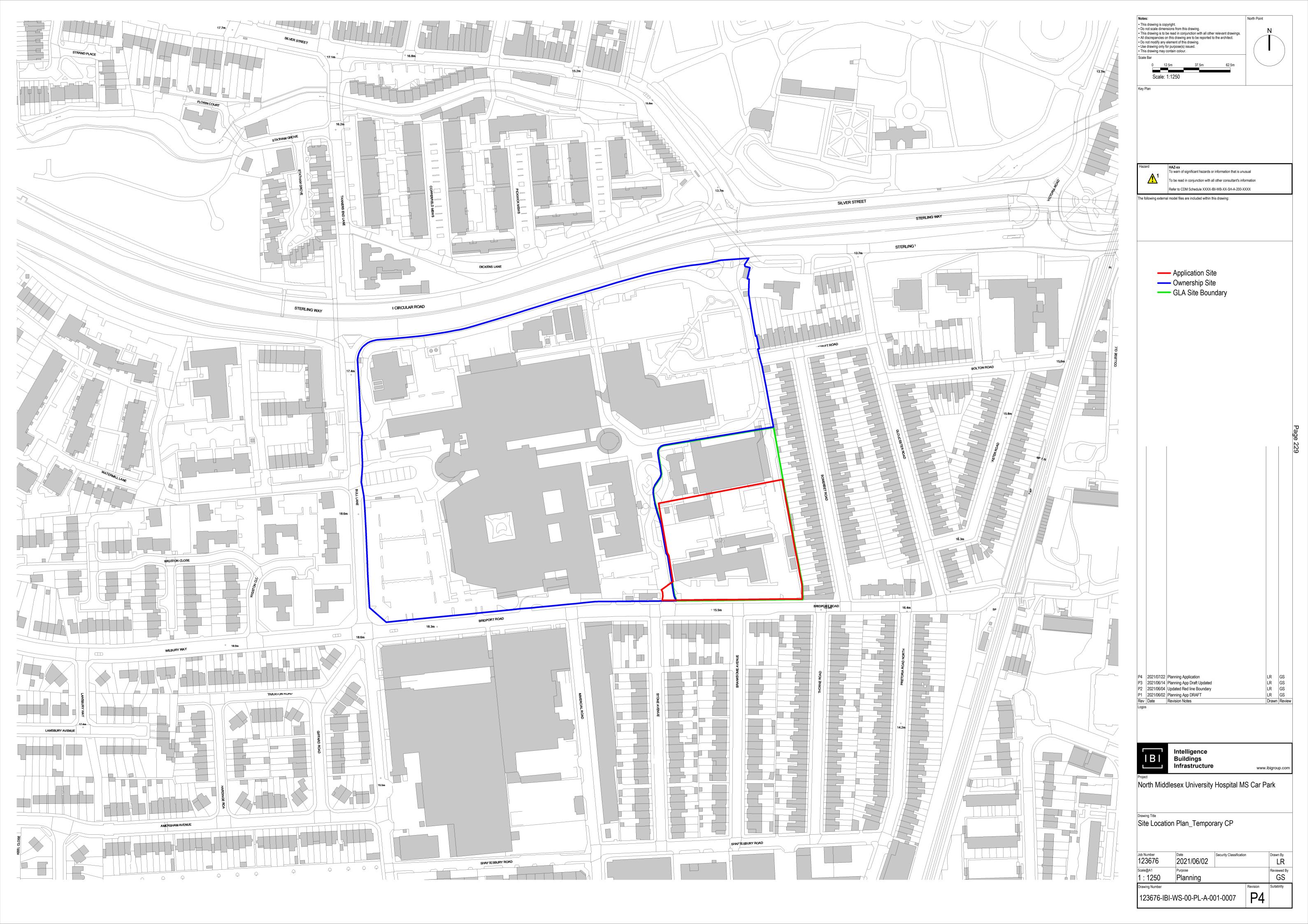


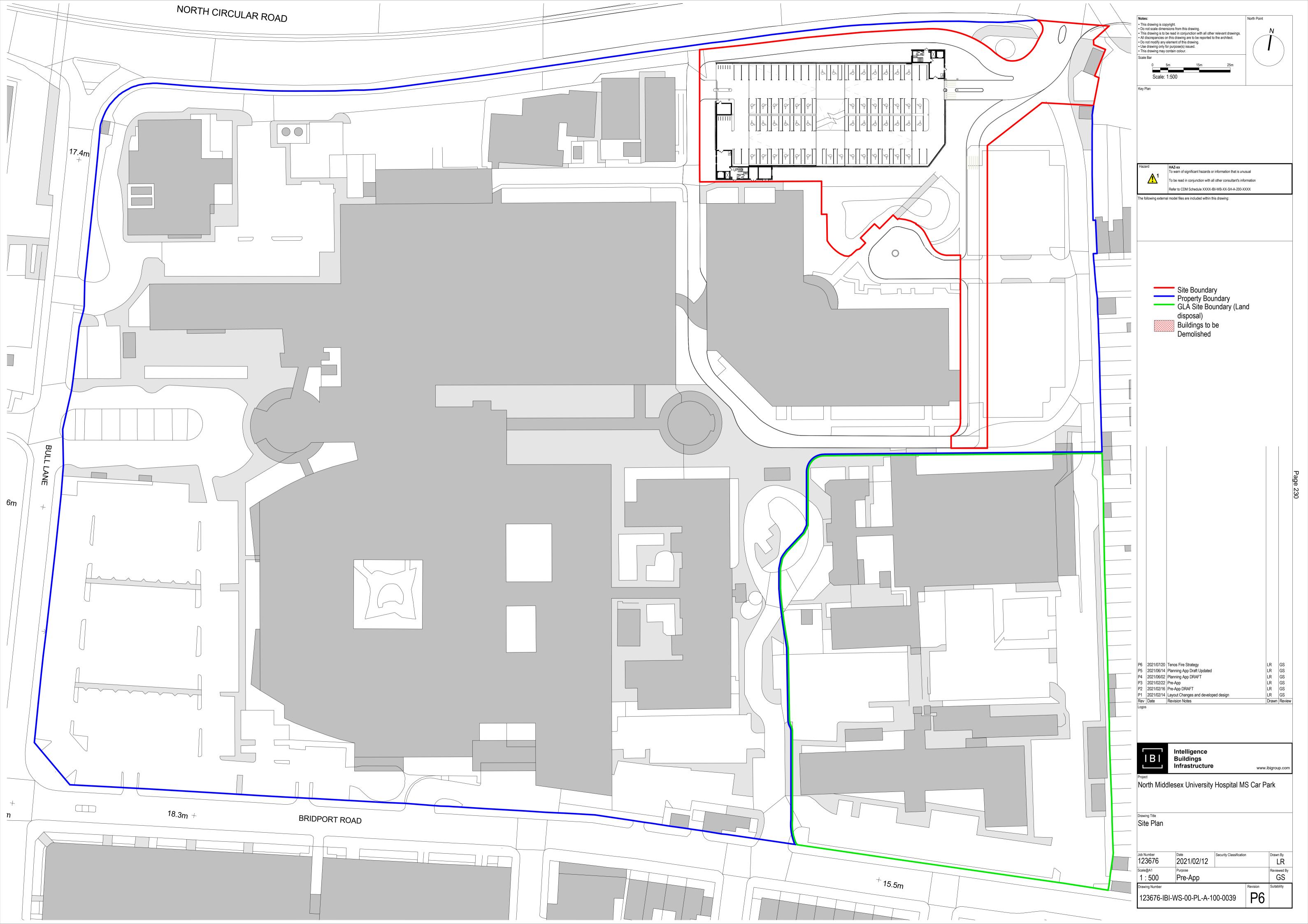
North Elevation - Existing TCP

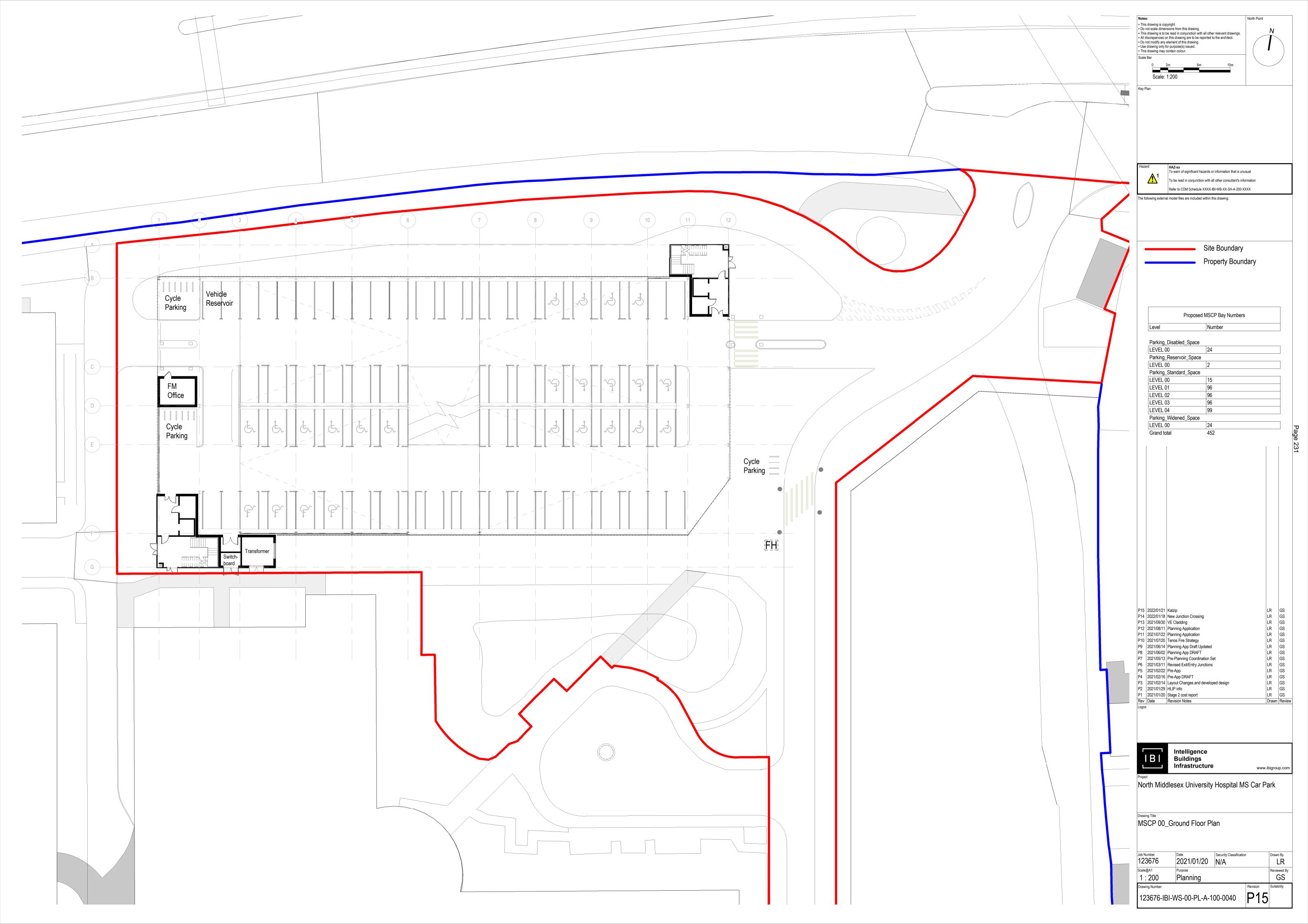


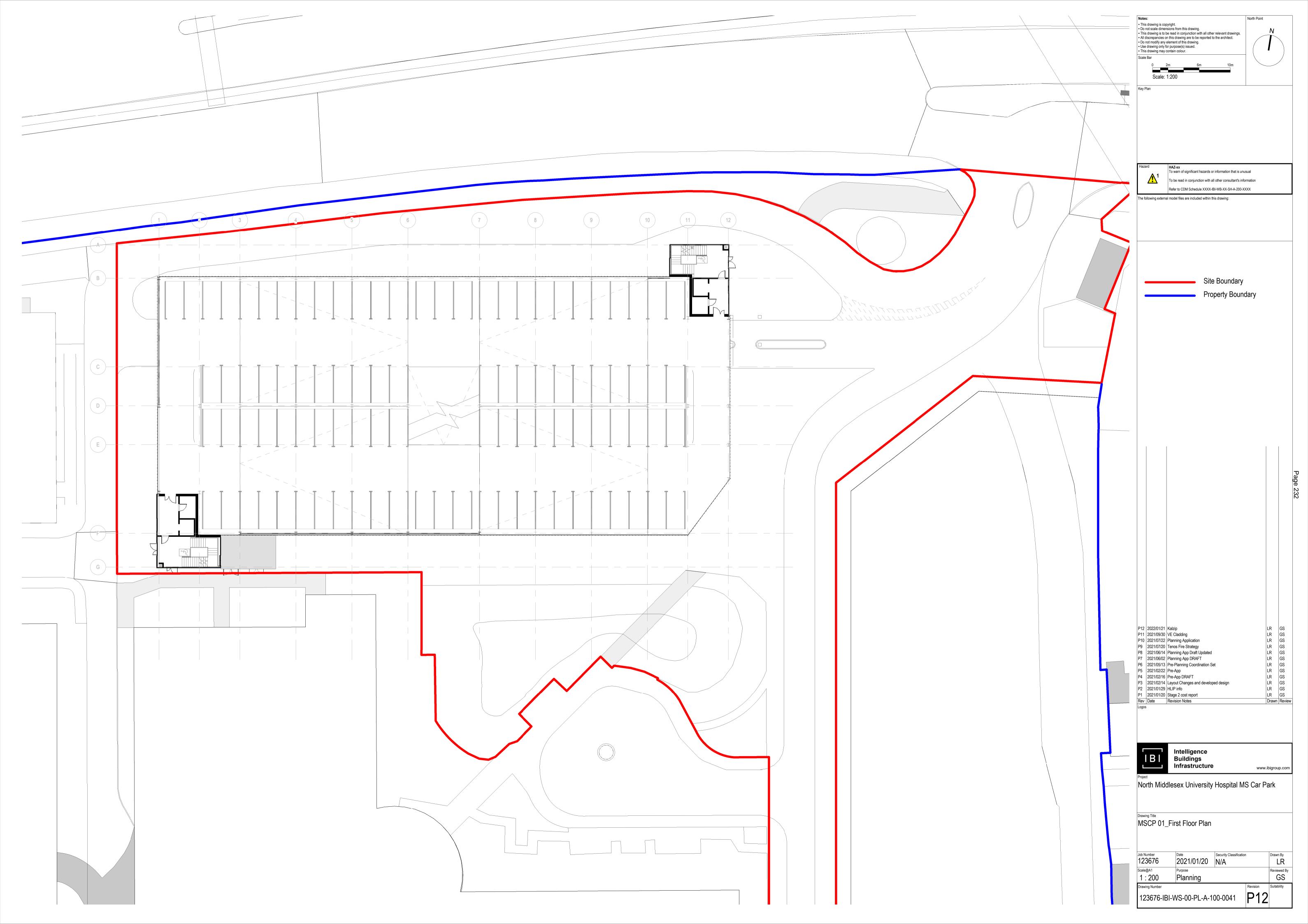
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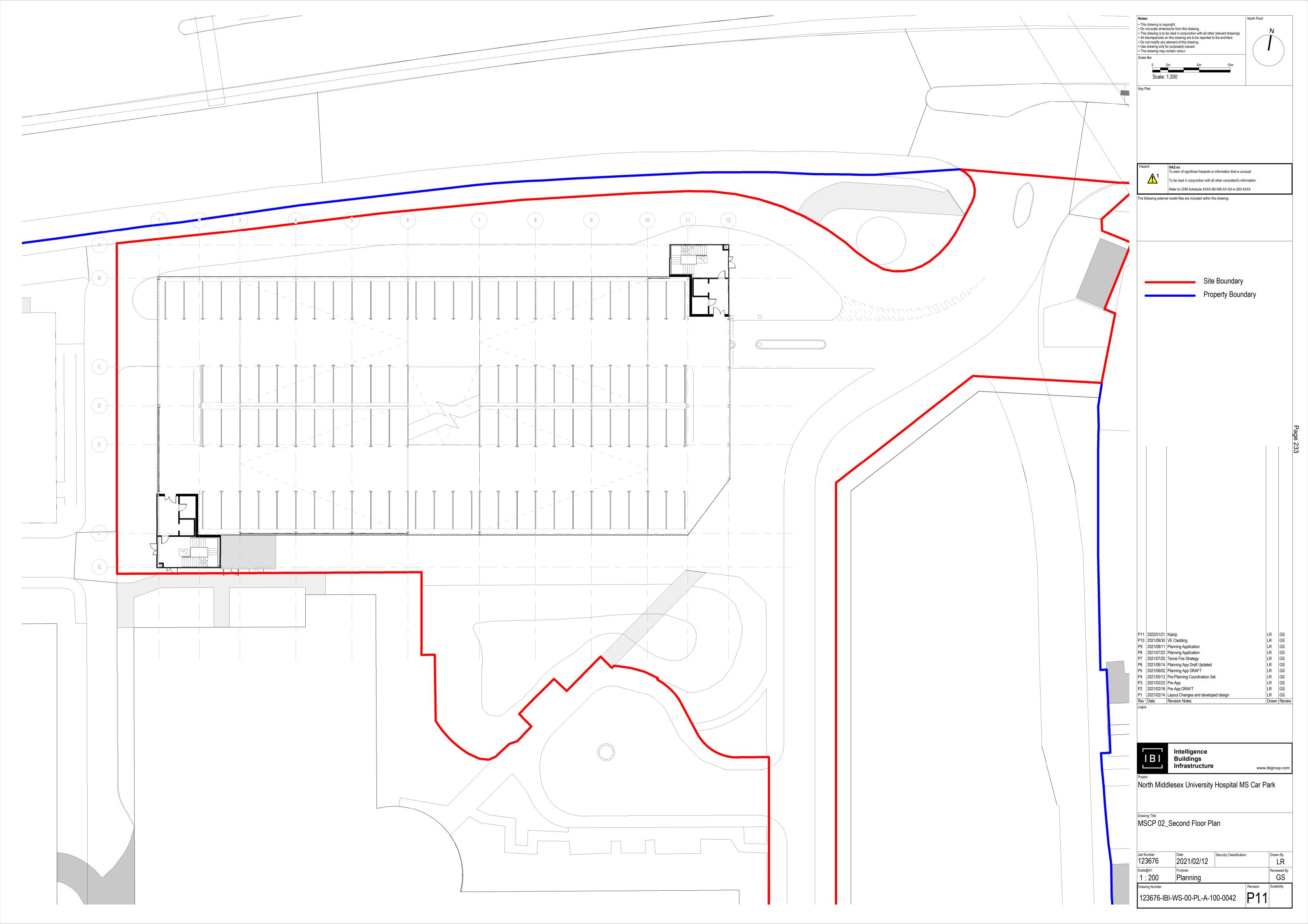


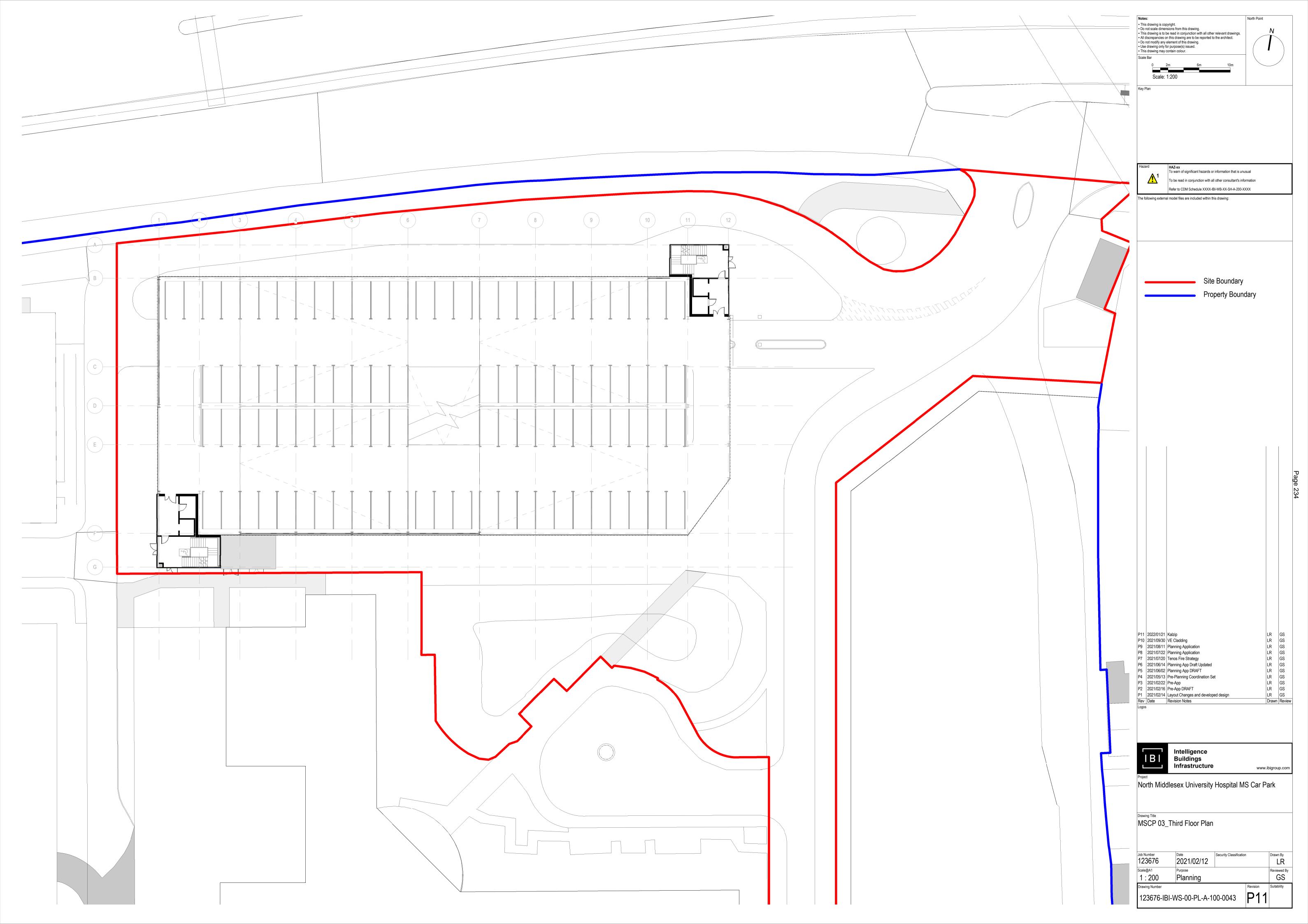


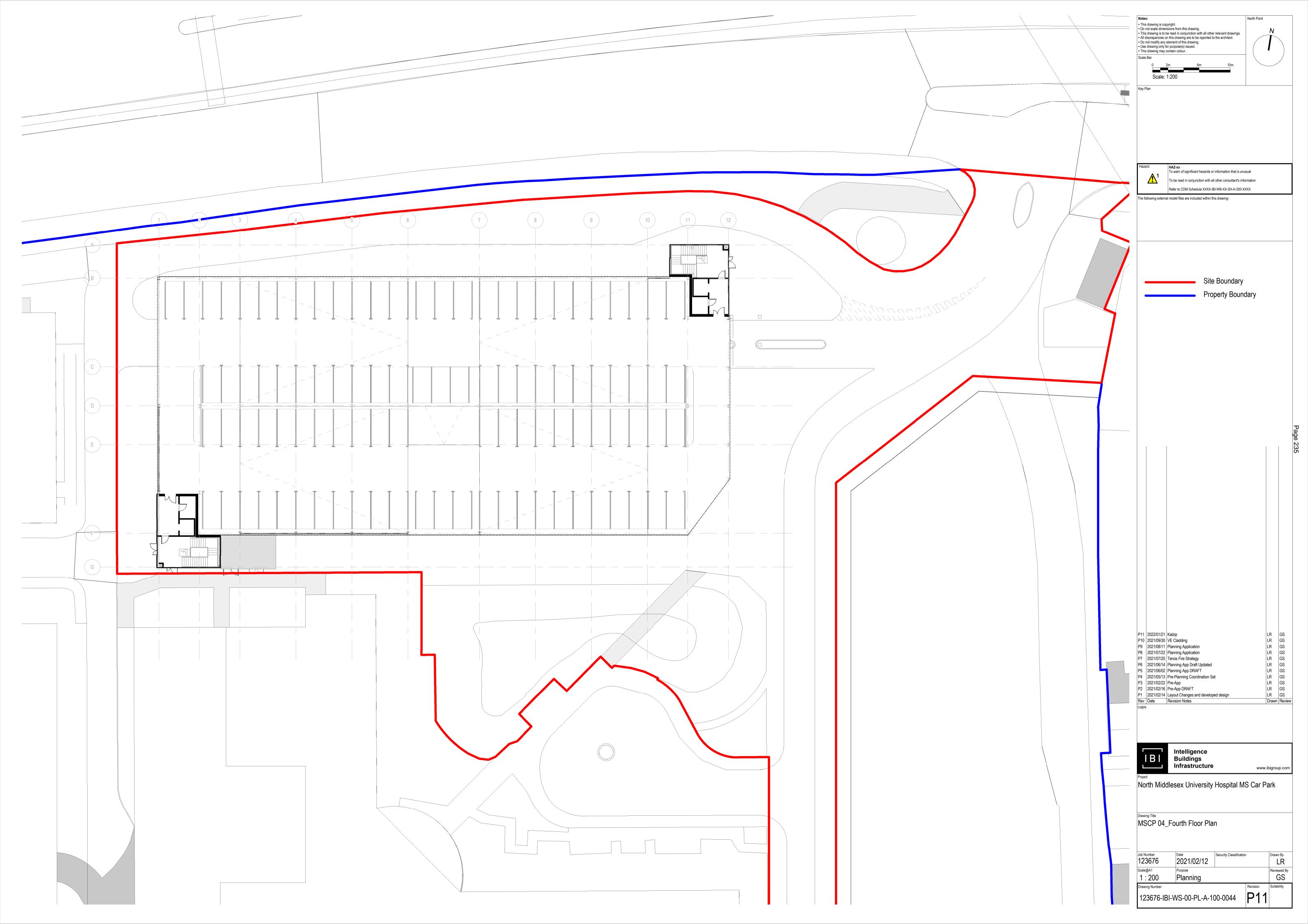


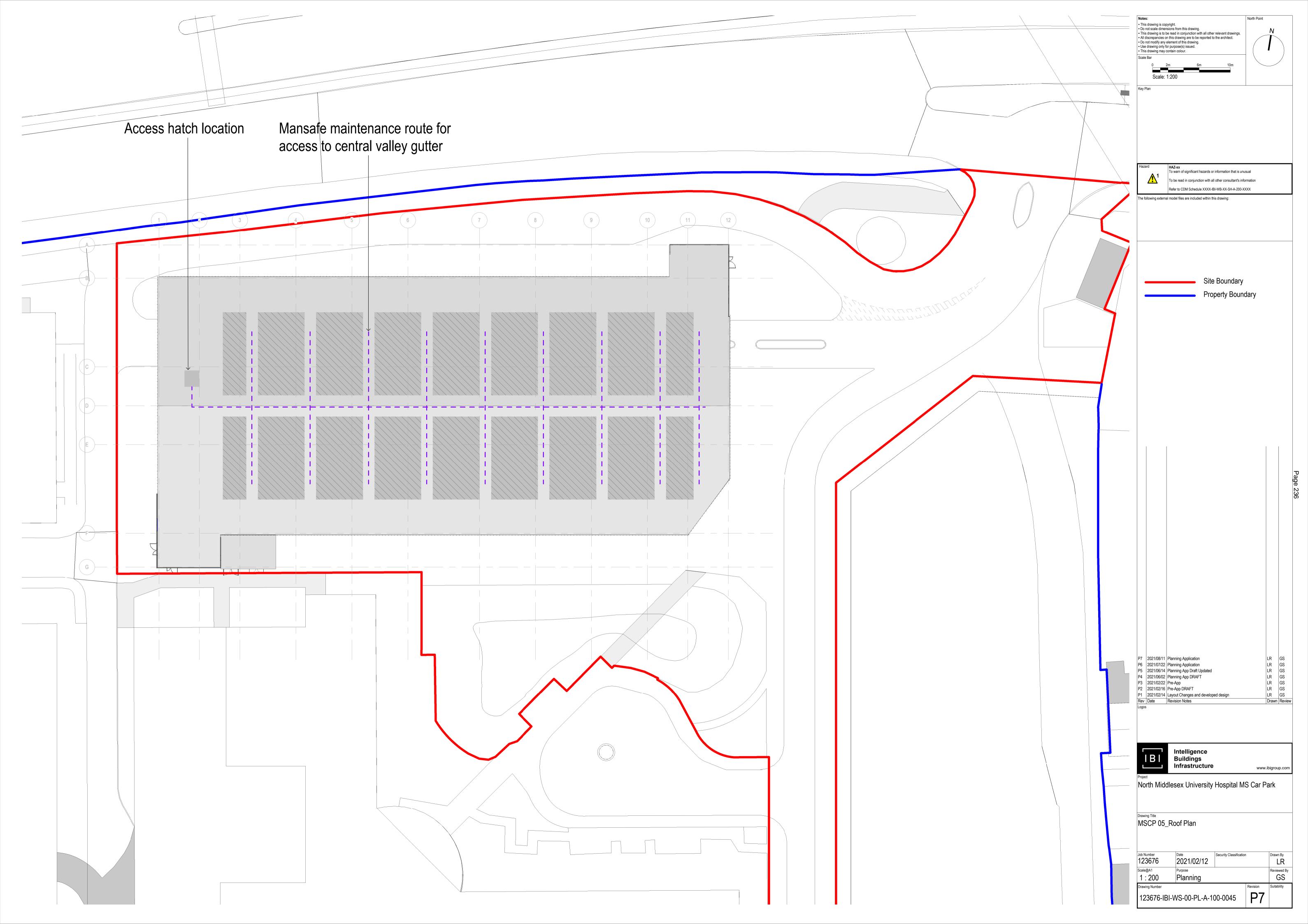


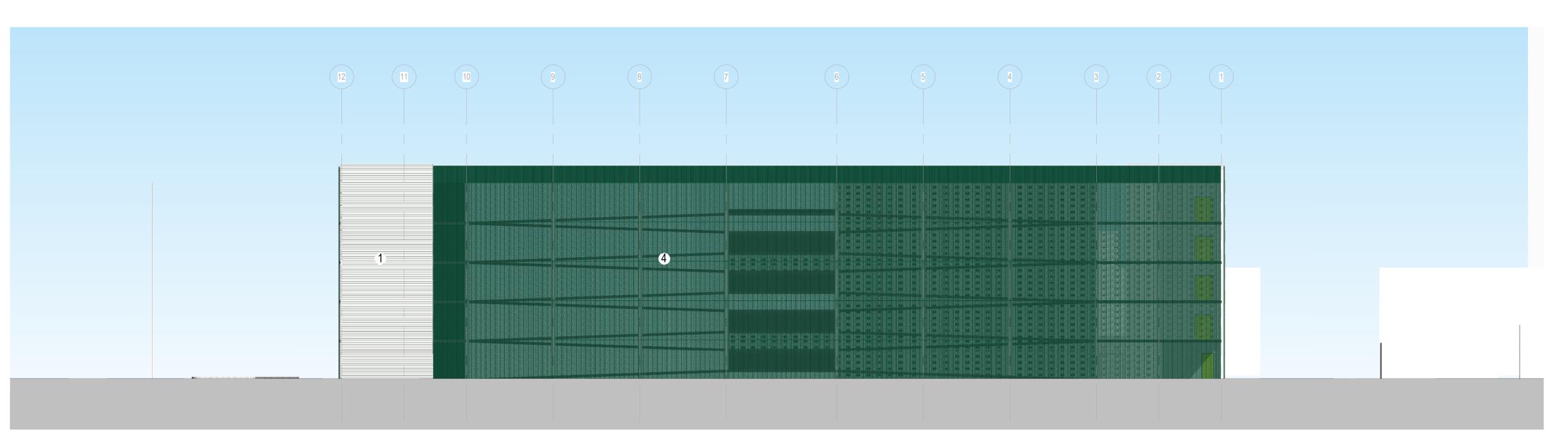






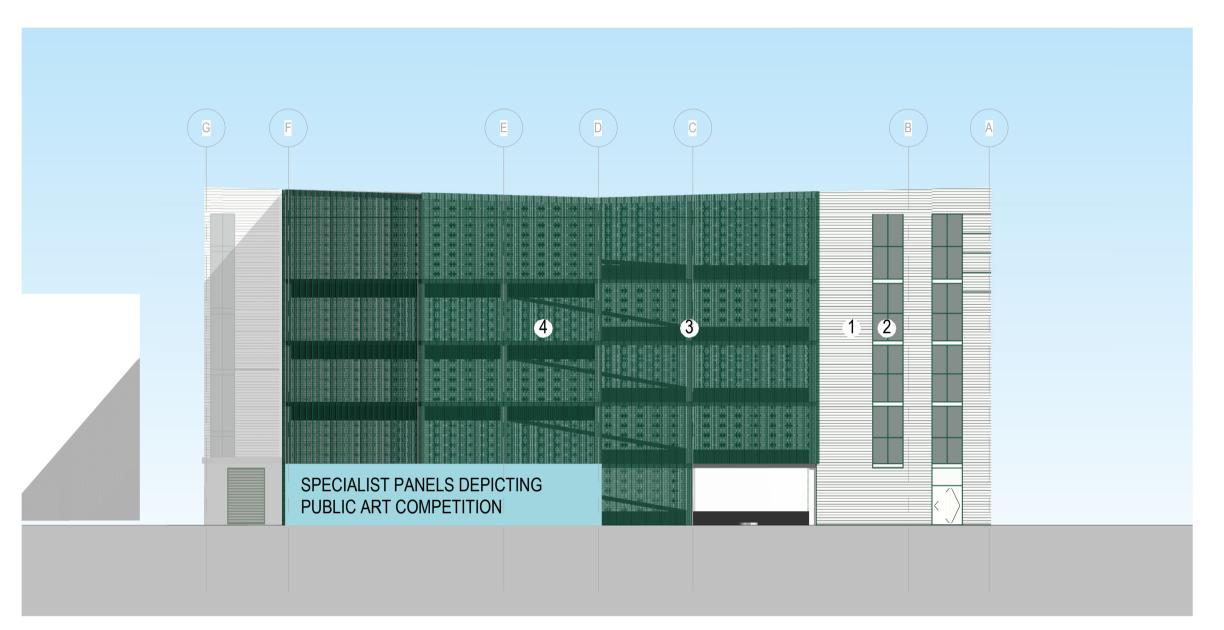






1. North Elevation Colour

1:200



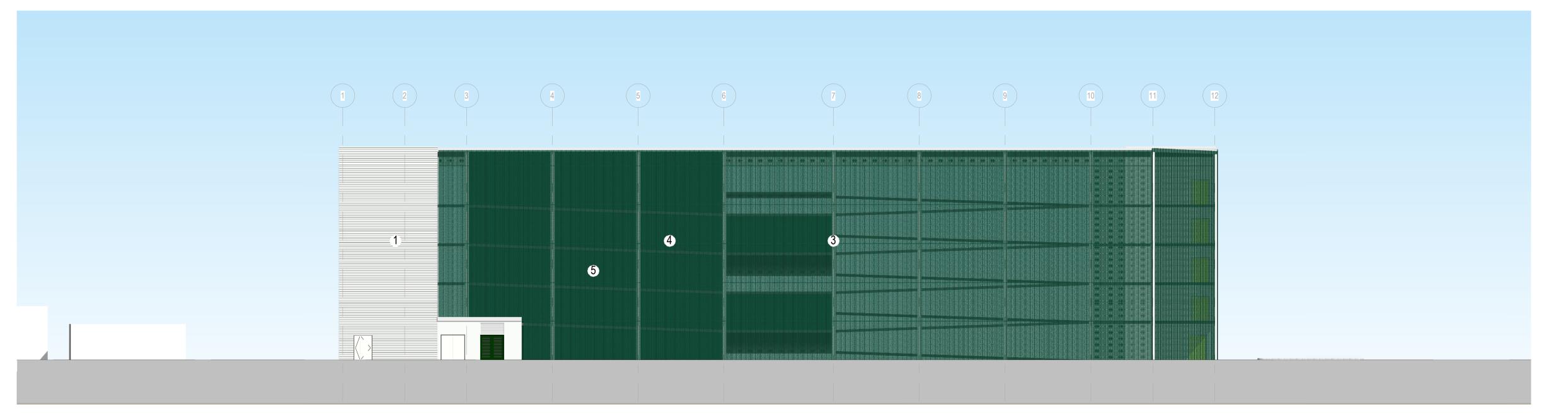


2. East Elevation Colour

1 : 200

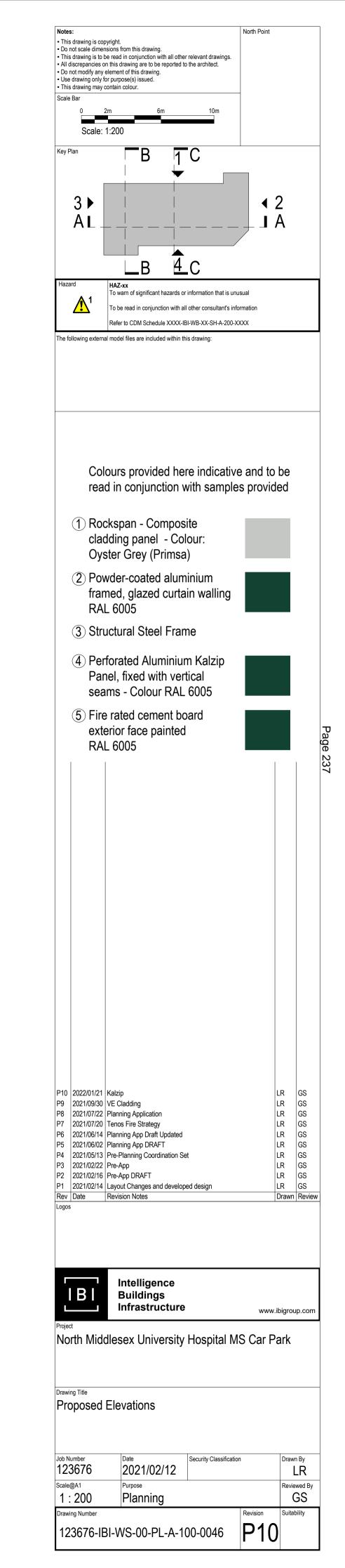
3. West Elevation Colour

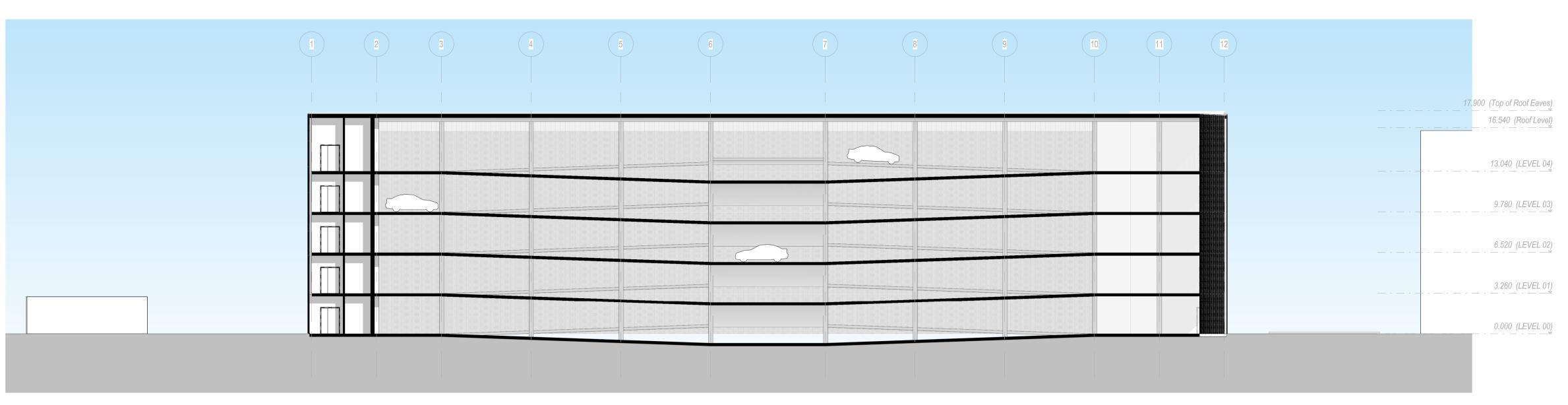
1:200



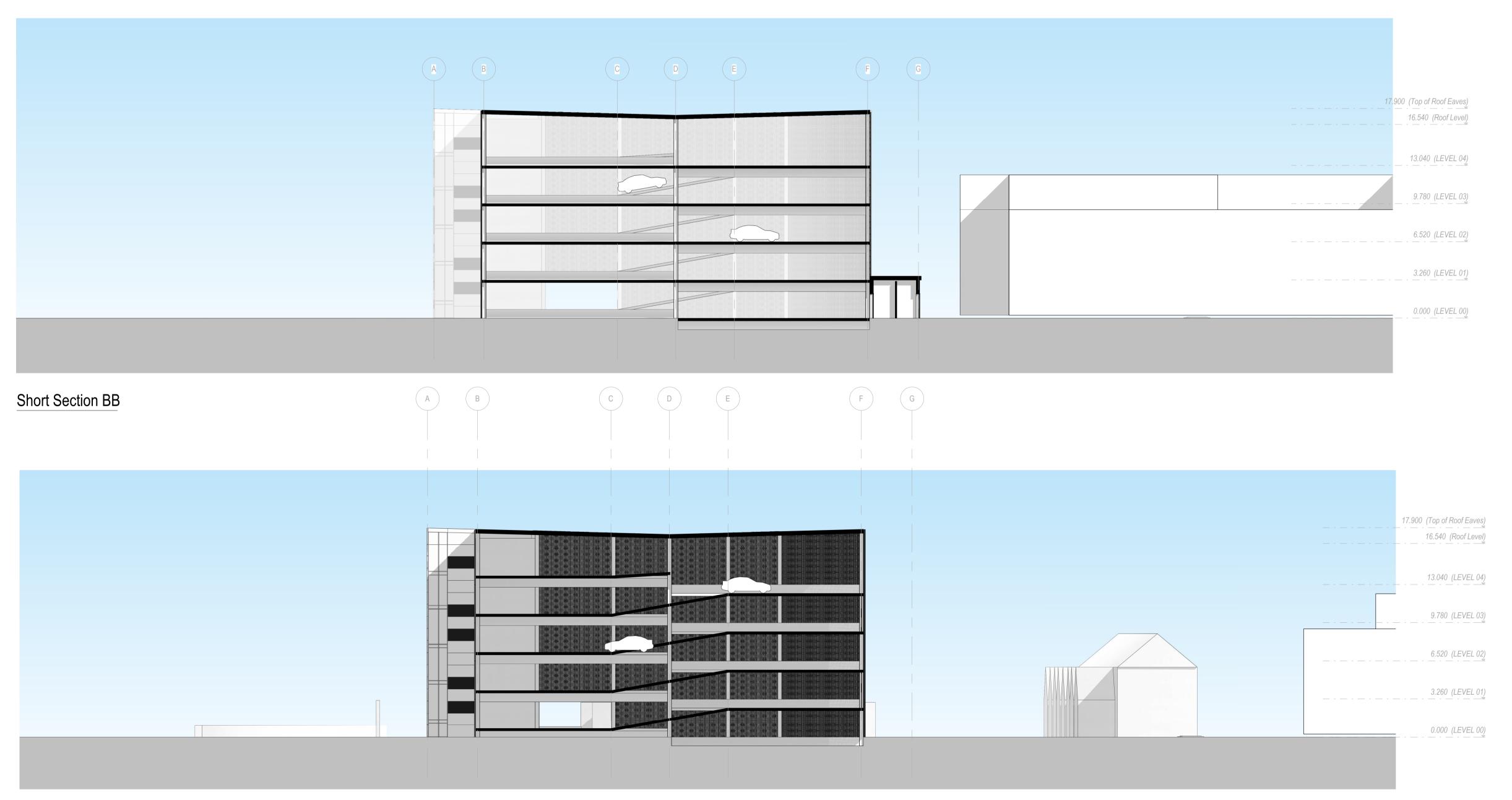
4. South Elevation Colour

1:200

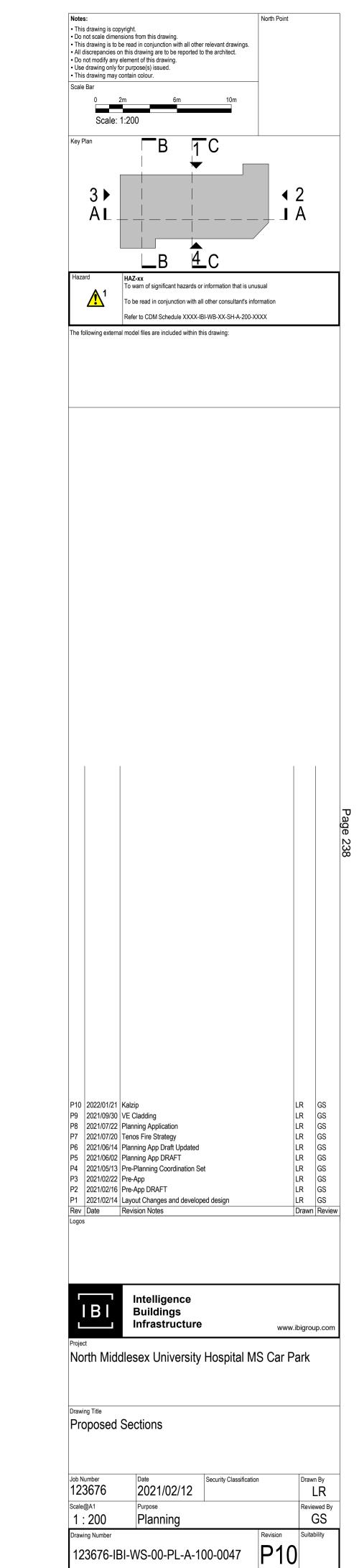


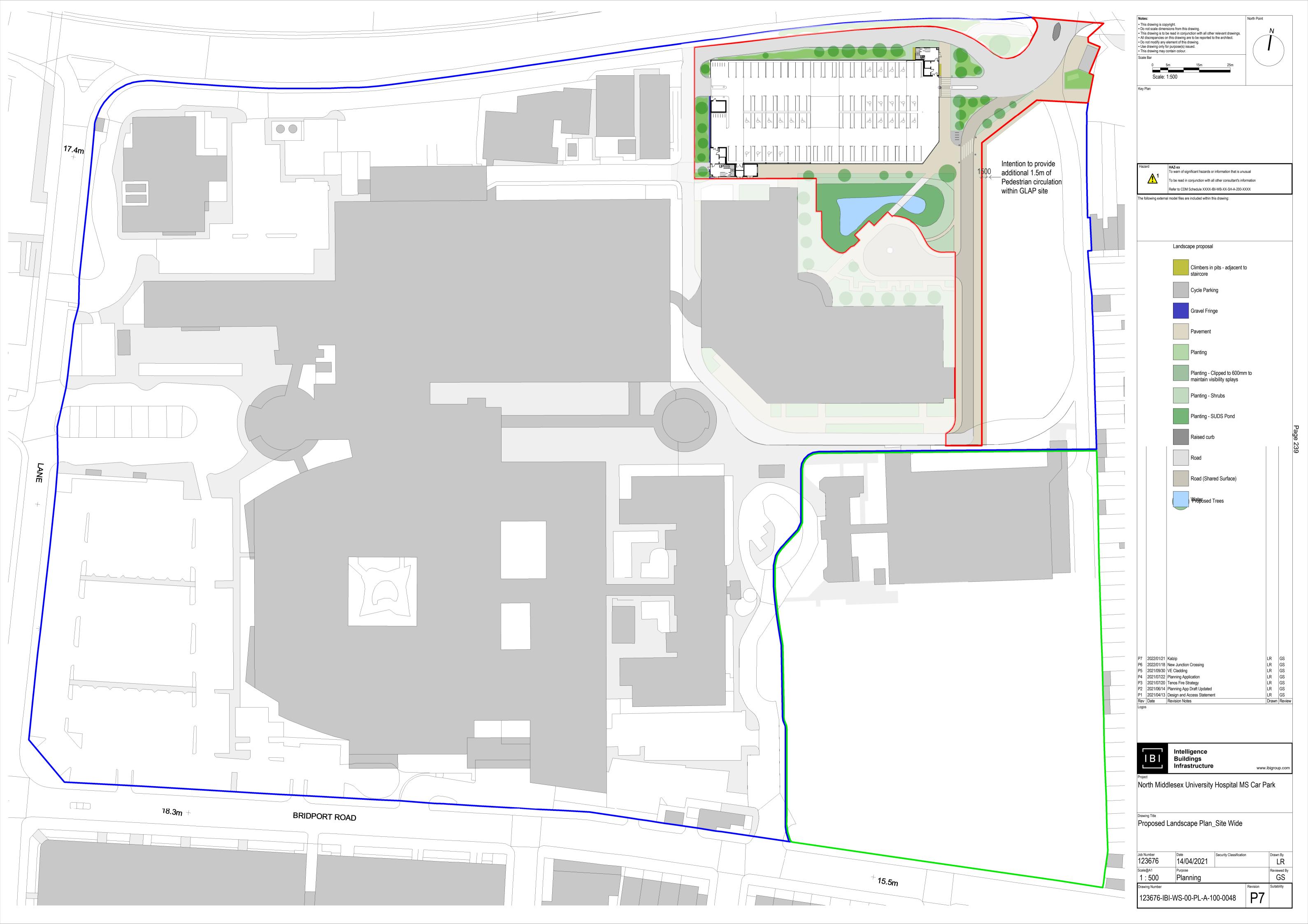


Long Section AA



Short Section CC











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North Middlesex University Hospital MS Car Park

Drawing Title
Pymmes Park View

Date 20/01/2022

Purpose For Planning

123676-IBI-WS-00-PL-A-100-0052

# GLA SITE BOUNDARY



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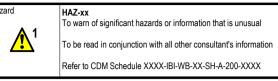
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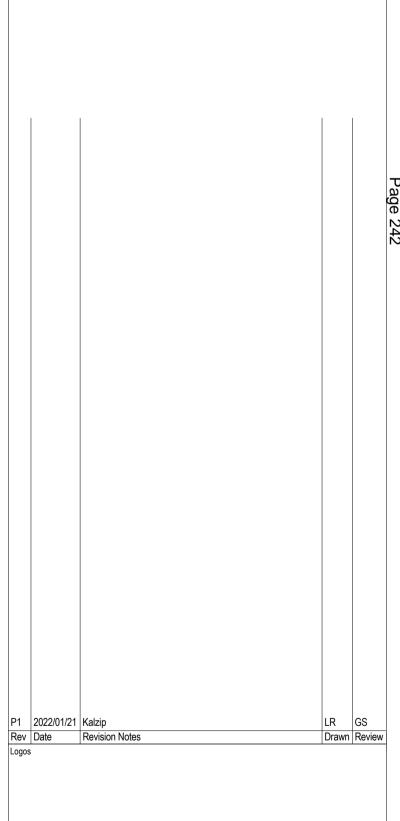
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Scale Bar



The following external model files are included within this drawing:



Intelligence
Buildings
Infrastructure

Project
North Middlesex University Hospital MS Car Park

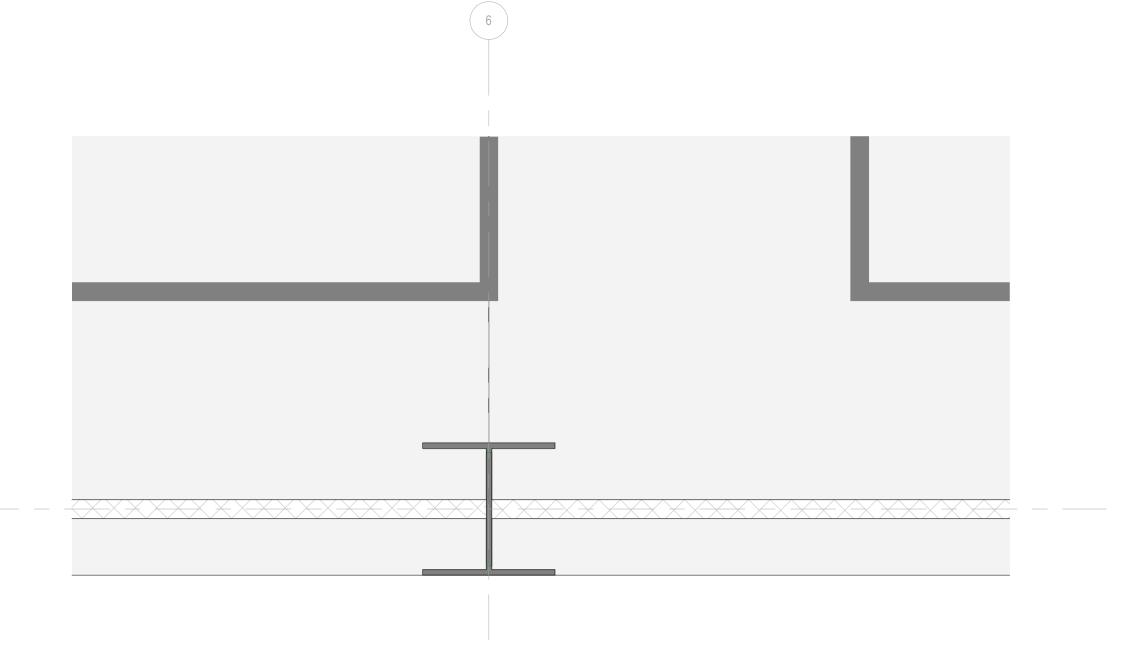
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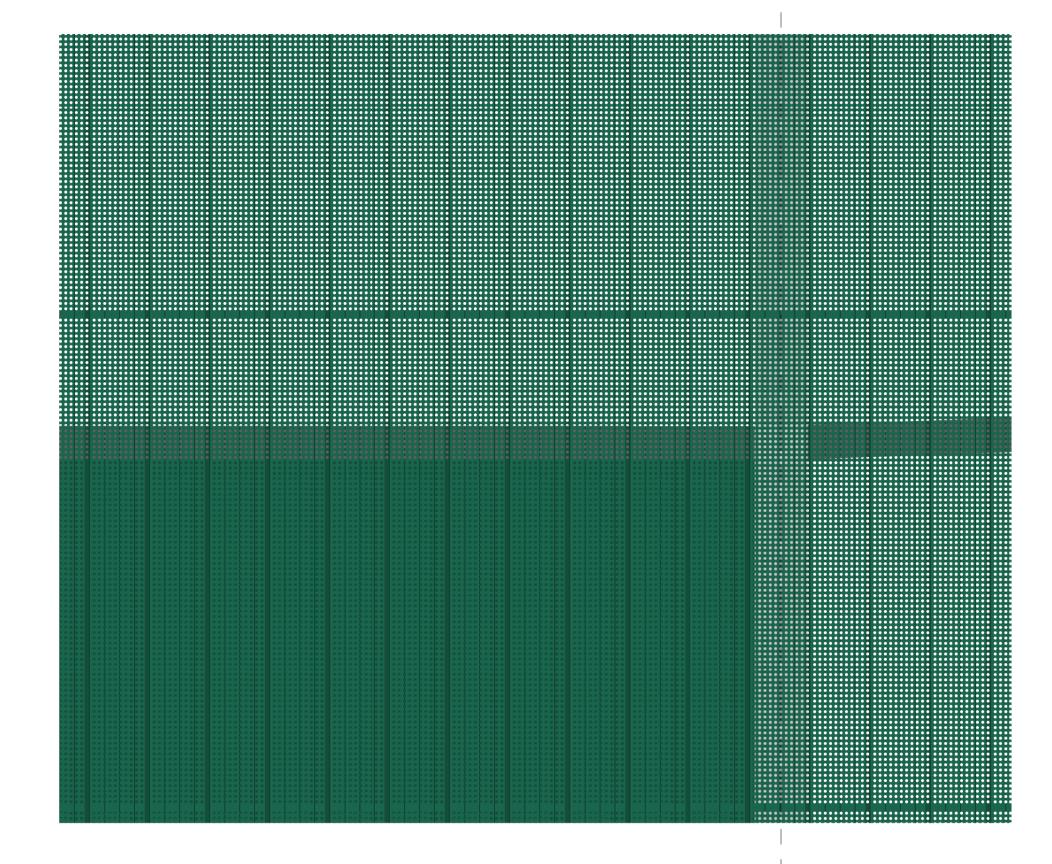
North Circular Entrance View

123676	Date 20/01/2022	Security Classification		Drav
Scale@A1	Purpose For Planning			Revi
Drawing Number			Revision	Suita
123676-IBI-WS-00-PL-A-100-0053			P1	









Courtyard Elevation Detail

1:25

Fire Wall to Column - Plan Detail

Intermediate Aluminium Supporting Rail
Perforated Kalzip panel

Fire rated cement board where needed under fire strategy

- 75mm Fine Screed
- 150mm Concrete Plank

─Car Barrier
─Steel Frame to

Steel Frame toStructural Engineerssizing

Floor to Wall Junction Section Detail

1:10

