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PLANNING COMMITTEE

Tuesday, 18th October, 2022 at 7.00 pm
Conference Room, Civic Centre, Silver
Street, Enfield, EN1 3XA

Contact: Robyn McIntock / Marie Lowe
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MEMBERS

Councillors : Sinan Boztas (Chair), Elif Erbil (Vice-Chair), Nawshad Ali,
Gunes Akbulut, Kate Anolue, Lee Chamberlain, Peter Fallart, Ahmet Hasan,
Mohammad Islam, Michael Rye OBE, Jim Steven and Doug Taylor

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

AGENDA – PART 1

1. WELCOME AND APOLOGIES

2. DECLARATIONS OF INTEREST

To receive any declarations of interest.

3. MINUTES OF THE PLANNING COMMITTEE MEETING HELD ON TUESDAY 28 SEPTEMBER 2022

To approve the minutes of the meeting held on Tuesday 28 September 2022 as a true and correct record.

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

To receive and note the covering report of the Head of Planning.

5. 22/01566/VAR - 50 SLADES HILL, ENFIELD, EN2 7EE (Pages 5 - 46)

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 this report.

WARD: Ridgeway

6. 22/01625/RE4 - 263 BULLSMOOR LANE, ENFIELD, EN1 4SF (Pages 47 - 90)

(Appendices to this report are published as a separate document)

RECOMMENDATION:

1. That in accordance with Regulation 3 of the Town & Country Planning General Regulations 1992, and subject to the finalisation of a shadow Section 106 Agreement to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to Grant Planning Permission subject to conditions.
2. That the Head of Development Management be granted delegated authority to finalise the wording of the Shadow section 106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

WARD: Whitewebbs

7. 22/01738/FUL - 385 COCKFOSTERS ROAD, BARNET, EN4 0JS (Pages 91 - 118)

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 this report.

WARD: Cockfosters

8. 21/01140/FUL - PUBLIC HOUSE, GREEN STREET, ENFIELD, EN3 7SH (Pages 119 - 188)

RECOMMENDATION:

1. That Planning Permission be Refused
2. That the Head of Development Management be granted delegated authority to agree the final wording of the reasons for Refusal as indicated in the Recommendation section of the report.

WARD: Brimsdown

9. 22/02098/RM - MERIDIAN WATER FORMER GAS HOLDER SITE, LEESIDE ROAD, LONDON, N18 (Pages 189 - 226)

(Appendices to this report are published as a separate document)

RECOMMENDATION:

1. That the Head of Development Management be authorised to Grant approval for the reserved matters application Subject to Conditions.
2. That the Head of Development Management be granted delegated authority to finalise the wording of the conditions to cover the matters in the Recommendation section of this report.
3. That the Head of Development Management be authorised to discharge the details submitted pursuant to conditions 9,11,5,23,27,29, 31,32,35,36,37,39,40,43,47,48,49,50,52,53,54,57,58,60,61,63,76,77 and 80.

WARD: Upper Edmonton

10. FUTURE MEETING DATES

To note that the dates of future meetings are as follows:

Tuesday 01 November 2022 * Provisional
Tuesday 22 November 2022
Tuesday 13 December 2022
Tuesday 10 January 2023 * Provisional
Tuesday 24 January 2023
Tuesday 7 February 2023 * Provisional
Tuesday 21 February 2023
Tuesday 7 March 2023 * Provisional
Tuesday 21 March 2023
Tuesday 18 April 2023

These meetings will commence at 7:00pm and will be held in the Conference Room at the Civic Centre.

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PLANNING COMMITTEE - 28.9.2022

**MINUTES OF THE MEETING OF THE PLANNING COMMITTEE
HELD ON WEDNESDAY, 28 SEPTEMBER 2022**

COUNCILLORS

PRESENT Elif Erbil, Nawshad Ali, Gunes Akbulut, Kate Anolue, Lee Chamberlain, Peter Fallart, Ahmet Hasan (Associate Cabinet Member (Enfield North)), Michael Rye OBE, Jim Steven, Mahym Bedekova and Thomas Fawns

ABSENT Sinan Boztas, Mohammad Amirul Islam and Doug Taylor

OFFICERS: Vincent Lacovara (Head of Planning), Andy Higham (Head of Development Management), Gideon Whittingham (Planning Decisions Manager), David Gittens (Planning Decisions Manager), Sarah Cary (Place Department), Elizabeth Paraskeva (Principal Lawyer), Jacob Ripper (Senior Planning Officer), Ian Davis (Chief Executive's Department), Terry Osborne (Chief Executive's Department), Brett Leahy (Place Department), Legal Contracts and Commercial Email Inbox (Legal Services), Sharon Davidson (Planning Decisions Manager), Joanne Drew (Acting Executive Director - Place), Karolina Grebowiec-Hall (Principal Planning Officer), Allison de Marco (Planning Decisions Manager - Strategic Applications), Joseph McKee (Senior Planning Officer), David B Taylor (Head of Traffic and Transportation), Julie Thornton (Legal Services) and Mike Hoyland (Senior Transport Planner) Marie Lowe (Secretary) and Robyn McLintock (Secretary)

Also Attending: Members of the public, deputies, applicant and agent representatives.

1**WELCOME AND APOLOGIES**

The Chair, Cllr Elif Erbil welcomed everyone to the meeting.

Cllr Anolue was nominated to be the Vice-Chair for the meeting.

Apologies were received from the following:

Councillor Sinan Boztas, substituted by Cllr Mayhem Bedekova
Councillor Doug Taylor, substituted by Cllr Thomas Fawns
Councillor Mohammad Islam – no substitute

2**DECLARATIONS OF INTEREST**

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No Declarations of Interest were received

Cllr Elif Erbil stated she is a ward councillor for Lower Edmonton.

Cllr Thomas Fawns stated he is a ward councillor for Upper Edmonton

3

MINUTES OF PREVIOUS MEETING

AGREED that the minutes of the meeting held on 06 September 2022 as a correct record.

4

REPORT OF THE HEAD OF PLANNING

RECEIVED the report of The Head Of Planning. Noted.

5

22/00168/OUT - MONTAGU INDUSTRIAL ESTATE, ENFIELD, LONDON, N18 2NG

1. The introduction by Gideon Whittingham (Planning Decisions Manager), clarifying the proposals.
2. Officers, responding to questions from Members, advised that the relocation of the church is secured as part of the legal agreement and the Council as the landowner is working with businesses and tenants onsite to relocate them. The wedding venue will not be relocated. Due to the nature of the site, there is expected ground contamination, the assessment of which will be conditioned. The more detailed full application would see 15 trees planted to replace the current 10. The outline element currently proposed no tree removal and any proposed would be subject to approval through discharge of condition.
3. Officers clarified that the total disabled car spaces provided are compliant but the spilt can still be determined. The space for electric charging spaces is within London Plan standards and funded by the developer. The rest of the spaces are passive electric charging spaces and can be changed if there is a future demand. Existing access will be maintained to avoid directing traffic onto residential streets, pedestrian access is more accessible from adjacent roads.
4. Following questions from Members, Officers confirmed that at present the site has 611 full time employees.
5. The unanimous support of the Committee for the officers' recommendation.

AGREED:

1. That subject to the completion of a legal agreement to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions.

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

6

21/04742/FUL - MERIDIAN WATER WILLOUGHBY LANE AND MERIDIAN WAY LONDON N18

1. The introduction by Karolina Grebowiec-Hall (Principle Planner), clarifying the proposals. An update report was circulated with amendments to the report including to the assessment of flood risk, ecology, and waste management as well as an update to the recommendation.
2. The deputation of Matt Burn who spoke against the officers recommendation.
3. The response from Sarah Parkinson (Vistry).
4. Members commented the biggest challenge of this application is the flood risk. Concerns were also raised regarding the adequacy of play space, height, whether the ground floor above had been sufficiently resolved, fire safety, the function of waste services, no family sized units and lack of response from the Fire Brigade and Education. There were also questions regarding the naturalisation of the Pymmes Brook.
5. Officers explained the play space available is appropriate in relation to the number of children expected and the comments of Sport England are addressed by the proposal. The wind conditions around the building can be dealt by condition to ensure there is appropriate mitigation. Sprinklers will be installed into the building. The arrangement for waste are set out in the update report and referred to the changes the scheme that has been made and the proposed Estate Management Plan.
6. Following questions from members, Officers confirmed that the application would provide 143 jobs during the construction period, including 45 apprenticeships. The non-residential floor space will be returned to Enfield Council for future allocation use.
7. Section 106 covers the provision of 2 bus stops in which crossing points will be considered. Condition 46 covers a waste management plan to ensure it works for the development and future residents.
8. The Director of Planning and Growth confirmed the flood risk has been under significant assessment over the past 9 months, in which the Environment agency support the recommendation. Our LLFA officer and team support the recommendation of this application. On the very unlikely event there is an issue, this item will be represented back to the Planning Committee. The Legal Team consider this approach to be reasonable.
9. On the basis the proposal had a number of issues remaining to be resolved, a motion was proposed by Cllr Rye, and seconded by Cllr Chamberlain to defer making a decision against the officer's recommendation to grant planning permission. The Director of

PLANNING COMMITTEE - 28.9.2022

Planning and Growth clarified the grounds for any deferral arising from the discussions; the councillors declared the application is deficient in resolving the flooding issue, management of waste and appropriate play space.

10. The majority voted against the motion, with 6 against and 5 for. The motion was not carried.
11. The officers recommendation was considered and then agreed with 6 votes for, 2 against and 2 abstain.

AGREED:

1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to NO OBJECTIONS being received from the Environment Agency, referral of the application to the Greater London Authority and the completion of a S106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions.
2. If an **OBJECTION** is raised by the Environment Agency, the Chair, Vice Chair and Opposition Lead will be consulted to determine if any changes required to address the objections require the scheme to be brought back to Planning Committee for decision.
3. That the Head of Development Management be granted delegated authority to finalise the wording of the S106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report

7

22/00106/FUL - MERIDIAN WATER, KIMBERLEY WAY, LONDON, N18

1. The introduction by Sharon Davidson, Planning Decisions Manager, clarifying the proposals, explaining the relationship of this proposal to the wider development.
2. Discussion around design and specific comments from members concerning the loss of approved community space. Officers explained that building on the approved community space was offset by provision elsewhere and that there was still sufficient amenity space being provided.
3. The unanimous support of the Committee for the Officers recommendation

AGREED:

1. That subject to the finalisation of a S106 Agreement link this application to the S106 Agreement for the wider phase 1 site, 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 S106 Agreement and conditions to cover the matters in the Recommendation section of this report.

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8

20-01815-FUL - 41-52 GILDA AVENUE, ENFIELD, EN3 7UJ

1. The introduction by Andy Higham, Head of Development Management clarifying the proposals.
2. Officers responded to queries from Members and confirmed they can work with the applicant to ensure window design can be conditioned. It was also confirmed that 6 trees are being removed with 14 semi mature trees being replaced.
3. The unanimous support of the Committee for the Officers recommendation

AGREED:

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

9

22-00047-FUL - ENFIELD DISTRICT HEAT NETWORK BETWEEN SOUTHBURY ROAD EN1 HERTFORD ROAD AND ST MARTINS ROAD N9

1. The introduction by Sharon Davidson, Planning Decisions Manager, clarifying the proposals. Noted the conditions set out in the update report.
2. Members requested that maps on reports or presentations show the road names in future.
3. Members were concerned that this would cause major traffic disruption and works should be scheduled during school holidays when traffic is lighter. The Head of Traffic and Transportation advised that they would do what they could to minimise the impact, but not all of the works could be carried out during the school holidays. There will be temporary lights and traffic management measures and these would be processed in accordance with standard highway procedures.
4. Following questions and comments from members, officers confirmed they will be working with local businesses to minimise their disruption and business rate relief could be applicable. Although there is no precise time scale, the works are likely to last for several months. Officers will be working to control the hours work is taken place for environmental aspects.
5. The unanimous support of the Committee for the Officers recommendation.

AGRRED:

1. In accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, the Head of Development Management be

PLANNING COMMITTEE - 28.9.2022

authorised to **GRANT** full planning permission subject to planning conditions.

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

10

FUTURE MEETING DATES

NOTED the dates of the future meetings.

London Borough of Enfield**Committee: PLANNING COMMITTEE****Meeting Date: 18th October 2022**

Subject: Report of Head of Planning**Cabinet Member: Cllr Susan Erbil****Executive Director: Sarah Cary****Key Decision: N/A**

Purpose of Report

1. To advise members on process and update Members on the number of decisions made by the Council as local planning authority.

Proposal(s)

2. To note the reported information.

Reason for Proposal(s)

3. To assist members in the assessment and determination of planning applications

Relevance to the Council Plan

4. The determination of planning applications supports good growth and sustainable development. Depending on the nature of planning applications, the proposals can deliver new housing including affordable housing, new employment opportunities, improved public realm and can also help strengthen communities

Background

5. 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.
6. 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.

7. Other background papers are those contained within the file, the reference number of which is given in the heading to each application.

Main Considerations for the Council

8. On the Schedules attached to this report, recommendations in respect of planning applications and applications to display advertisements are set out.
9. Also set out in respect of each application a summary of any representations received. Any later observations will be reported verbally at your meeting.
10. In accordance with delegated powers, 255 applications were determined Between 15/09/2022 and 04/10/2022, of which 224 were granted and 31 refused.
11. A Schedule of Decisions is available in the Members' Library.

Safeguarding Implications

12. None

Public Health Implications

12. None

Equalities Impact of the Proposal

14. None

Environmental and Climate Change Considerations

15. None

Risks that may arise if the proposed decision and related work is not taken

16. Not applicable

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

17. Not applicable

Financial Implications

18. None

Legal Implications

19. None

Workforce Implications

20. None .

Property Implications

21. None

Other Implications

22. None

Options Considered

23. None

Conclusions

24. The conclusions reached having taken all of the above into account.

Report Author: Andy Higham
Head of Development Management
Andy.higham@enfield.gov.uk
020 8132 0711

Date of report: 07.10.2022

Appendices

None.

Background Papers

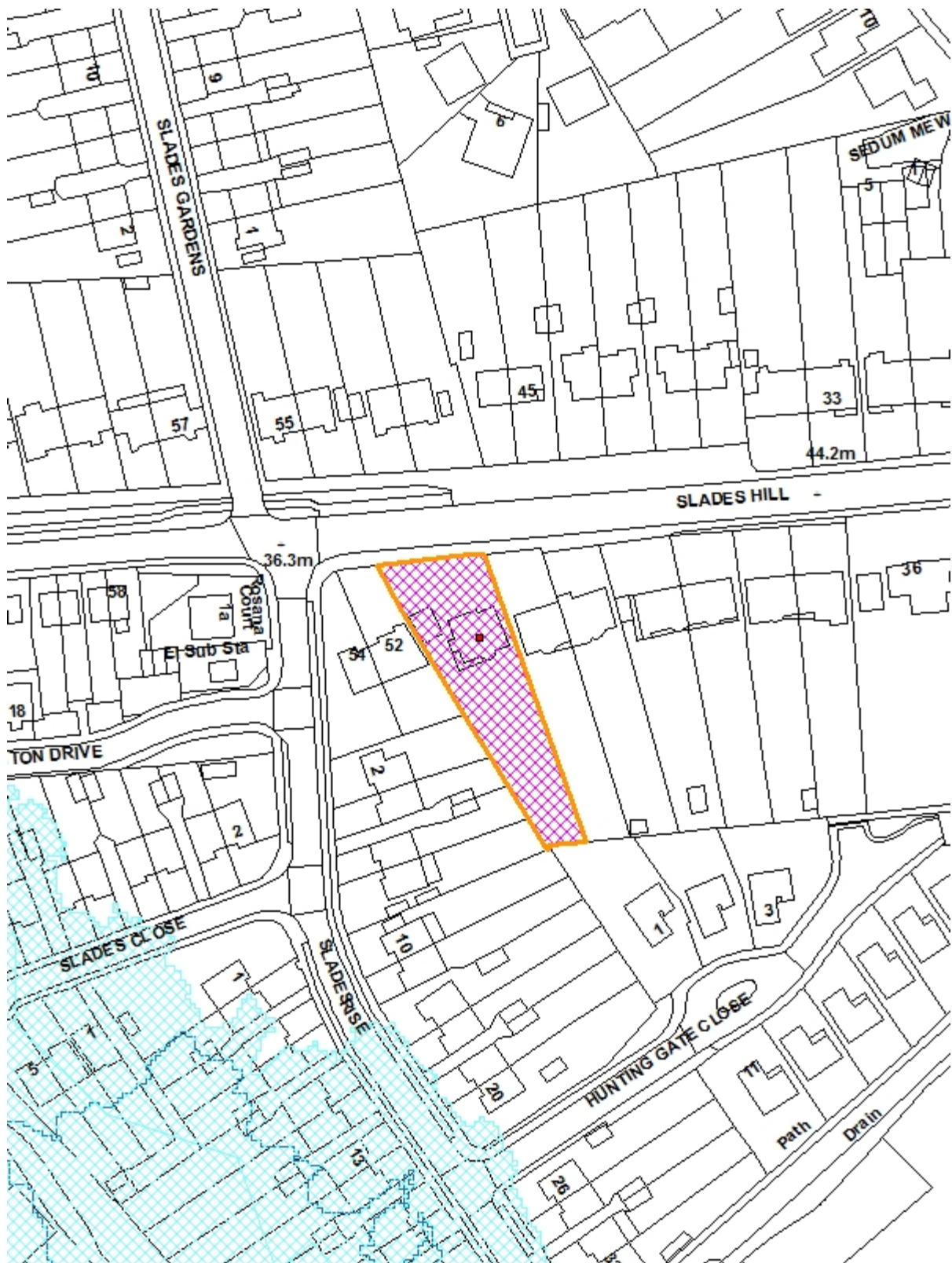
To be found on files indicated in Schedule.

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LONDON BOROUGH OF ENFIELD**PLANNING COMMITTEE****Date:** 18 October 2022**Report of**
Head of Planning**Contact Officers:**
Andy Higham
David Gittens**Ward:**
Highlands**Application Number:** 22/01566/VAR**Category:** Minor**LOCATION:** 50 Slades Hill, Enfield, EN2 7EE**PROPOSAL:** Variation of application reference 21/04783/FUL condition 02 for internal and external alterations to allow an additional unit (revised description).**Applicant Name & Address:**
Slades Hill Investments Ltd,
50 Slades Hill
Enfield
EN2 7EE**Agent Name & Address:****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 this report.

Ref: 22/01566/VAR LOCATION: 50 Slades Hill, Enfield, EN2 7EE,



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Scale 1:1250

North



Ref: 22/01566/VAR LOCATION: 50 Slades Hill, Enfield, EN2 7EE,



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Scale
1:1250

NORTH

1. Note for Members

- 1.1 Although a planning application of this scale and number of units would normally be determined under delegated authority, the application is been reported to the Planning Committee for determination at the request of Councillor Laban due to the level of local interest in this application.

2. Recommendation

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

Time limit

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

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

Approved Drawings

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

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

No Additional Fenestration

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

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

Vegetation Clearance

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

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

Obscure Glazing

5. The glazing to be installed in the flank elevations of the development shall be obscured to level 3 or above on the Pilkington Obscuration Scale and fixed shut to a height of 1.7m above the floor level of the room to which they relate. The glazing shall not be altered without the approval in writing of the Local Planning Authority.

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

Details of materials

6 Above ground works shall not commence until details of the external finishing materials to be used are submitted to and approved in writing by the Local Planning Authority. Detailed drawings to a scale of 1:20, detailed elevations annotating the location of materials, a schedule of materials, manufacturer's technical specification and a

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

Reason: To ensure a satisfactory external appearance

Electric Vehicle Charging

7 The development shall not be occupied until the details and confirmation of electric charging points for each parking space have been submitted to and approved by the Local Planning Authority.

Reason: To ensure that the development complies London Plan.

Vehicular Parking

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

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

Groundwater Flood Risk Assessment

9 The development shall not commence until a Groundwater Flood Risk Assessment has been submitted to and approved in writing by the Local Planning Authority. The details shall include:

- a) Onsite geological investigation
- b) Information on the depth to groundwater and relative depth of the basement level
- c) Identification of groundwater flow routes, and demonstration that the proposed basement will not impact these
- d) Measures to reduce the impact of the basement on groundwater flows and flooding

Reason: To minimise flood risk in accordance with Policy CP28 of the Core Strategy and Policies SI12 of the London Plan, DMD Policy 62 and the NPPF

Sustainable Drainage Strategy

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

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

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy, DMD Policy 61, and Policies SI12 & SI13 of the London Plan and the NPPF and to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value

Drainage Verification Report

11. Prior to occupation of the development, a Verification Report demonstrating that the approved drainage / SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include:

- As built drawings of the sustainable drainage systems including level information (if appropriate)
- Photographs of the completed sustainable drainage systems
- Any relevant certificates from manufacturers/ suppliers of any drainage features
- A confirmation statement of the above signed by the site manager or similar

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

Bat Surveys

12 Prior to demolition, further bat surveys (presence/likely absence surveys - one at dusk and one predawn) shall be undertaken by an appropriately qualified ecologist [full member of IEEM and/or a Natural England Bat licence holder with experience of supervising demolitions where there is a risk of bats being present] to establish whether bats are present on the site. The results of the survey shall be submitted to and approved in writing by the Local Planning Authority. If evidence of bat roosts is found a licence from the Statutory Nature Conservation Organisation for development works affecting bats must be obtained and a copy submitted to and approved in writing by the Council.

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

Biodiversity enhancement

13 Prior to commencement of above ground works, details of the number, siting and specification of bat and bird bricks/tiles/boxes designed into and around each new building and trees under the supervision of a suitably qualified ecologist shall be submitted to the Local Planning Authority for approval in writing.

Confirmation of installation, prior to first occupation, together with accompanying photographic evidence shall be submitted to the Local Planning Authority. The installation shall be retained for the life of the buildings.

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

Crossovers

14 The development shall not be occupied until the existing vehicular access has been reinstated at the expense of the applicant.

Reason: In the interests of preserving the appearance of the street scene

Means of enclosure

15 Prior to commencement of above ground works, the means of site enclosure, inclusive of the rear private gardens, must be submitted to and approved in writing by the Local Planning Authority. The approved details shall be installed prior to occupation.

Reason: In the interests of highway safety and maintaining adequate visual clearance and privacy.

Hard Surfacing

16 Prior to commencement of above ground works, details of the surfacing materials to be used within the development including footpaths, access, parking areas, and road markings must be submitted to and approved in writing by the Local Planning Authority. Reason: To ensure that the development does not prejudice highway safety and a satisfactory appearance.

Accessibility

17 Prior to commencement of above ground works, details of how the development will comply with the provisions of the Building Regulations (2010) Access to and Use of Buildings, Volume 1: Dwellings, Section M4(2) Category 2: Accessible and Adaptable Dwellings (as amended), must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development provides for the needs of future occupants and the adaptation of the dwelling to meet changing needs over time, in accordance with London Plan Policies D5 and D7, Core Strategy Policy CP 4, and Development Management Document Policy DMD 8.

Landscaping

18 No works or development shall take place until full details of the landscape proposals have been submitted to and approved by the Local Planning Authority. Details shall include:

- a. Planting plans;
- b. Written specifications (including cultivation and other operations associated with plant and grass establishment);
- c. Schedules of plants and trees, to include native, wildlife friendly species and large canopy trees in appropriate locations (noting species, planting sizes and proposed numbers / densities);
- d. Implementation timetables;
- e. Wildlife friendly plants and trees of local or national provenance;
- f. How the Landscaping conforms with the Drainage Strategy; and,
- g. Details of a maximum of 6 off street parking spaces including one of the spaces designated for visitor parking.

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

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

Tree Protection

19 The development shall not commence until an Arboricultural Method Statement & Tree Protection Plan has been submitted to the Local Planning Authority and approved in writing. These details shall include:

- fencing type
- ground protection measures
- -"no dig" surfacing
- access facilitation pruning specification

- project phasing and an auditable monitoring schedule.

Reason: To safeguard the existing trees on site and ensure the sustainability of the proposed replacement trees.

Levels

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

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

Refuse Storage

21 The development shall not commence until details of siting of refuse storage facilities including facilities for the recycling of waste to be provided within the development, in accordance with the Enfield Councils Waste and Recycling Planning Storage Guidance, available at <https://new.enfield.gov.uk/services/planning/waste-and-recycling-storage-planning-guidanceplanning.pdf> have been submitted to and approved in writing by the Local Planning Authority. The facilities shall be provided in accordance with the approved details before the development is occupied or use commences.

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

Cycle Parking

22 The development shall not commence until the details, siting and design of 14 secure/covered cycle parking spaces have been submitted to and approved in writing by the Local Planning Authority. The approved details shall thereafter be installed and permanently retained for cycle parking.

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

Carbon Emissions

23 The development shall not commence until an Energy Statement confirming the CO₂/yr (using SAP 10) reduction over Part L of Building Regulations (2013) has been submitted to and approved in writing by the Local Planning Authority. The Energy Statement shall follow the 'be lean, be clean, be green' reduction hierarchy set out in the London Plan and aspire to achieve a 35% reduction over Part L of Building Regulations (2013).

Any solar panels or other low or zero carbon technologies recommended to be included in the development by the Energy Statement shall be incorporated into the development and installed in accordance with the recommendations of Energy Statement prior to first occupation of the development.

Reason: In the interest of sustainable development and to ensure that the Local Planning Authority may be satisfied that CO₂ emission reduction targets are met in accordance with DMD 51 of the Enfield Development Management Document 2014.

Energy Certificates

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

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

Potable Water

25 Development shall not be occupied until details of the internal consumption of potable water have been submitted to and approved in writing by the Local Planning Authority. Submitted details will demonstrate reduced water consumption through the use of water efficient fittings, appliances and recycling systems to show consumption equal to or less than 105 litres per person per day as specified in the pre-assessment submitted with the scheme. The development shall be carried out strictly in accordance with the details so approved and maintained as such thereafter.

Reason: To promote water conservation and efficiency measures in all new developments and where possible in the retrofitting of existing stock in accordance with Policy CP21 of the Core Strategy

Privacy Screen

26 Prior to occupation of the development hereby approved details of translucent obscure glazed screening the first floor level balconies shall be submitted to the Council and approved in writing. The approved details shall thereafter be maintained in situ for the life time of the development.

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

Basement

27 No works or development shall take place until a basement impact assessment has been submitted to and approved in writing by the Local Planning Authority. The basement shall thereafter be constructed in accordance with the methodology specified in the basement impact assessment.

Reason: to ensure the basement does not affect the stability of the site or adjoining properties.

Construction Management Plan

28 No development shall commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the local planning authority. The statement shall include:

- a) photographic condition survey of public carriageways, verges and footways in the vicinity of the site;
- b) map showing routeing of demolition and construction vehicles to/from the site;
- c) access arrangements to the site;
- d) wheel cleaning methodology and facilities
- e) noise mitigation measures

Reason: in the interests of good planning and to safeguard the residential amenity of neighbouring occupiers.

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

3.0 **Executive Summary**

- 3.1 Planning permission was granted at this address in February 2022 for:

“Demolition of existing two storey dwelling and for the redevelopment of a two storey property with basement and accommodation in roofspace, for the provision of self contained units; with access via a crossover”

- 3.2 The approved scheme provided 6 self contained flats. The ground floor flat within the approved scheme was exceptionally large and application is now made to change the scheme so that the ground floor level flat is subdivided to provide 2 flats, 7 flats overall; a net increase of 6 residential units on the site.
- 3.3 The reasons for recommending approval are:
- i) The external size and appearance of the block would be unchanged from the previously granted scheme;
 - ii) The surrounding residential properties would not experience any loss of amenity when compared to the previously granted scheme;
 - iii) The proposal would contribute towards the delivery of homes within the borough,
 - iv) The proposal would provide adequate car parking, access and servicing provision;
 - v) The proposal presents an opportunity to enhance biodiversity on the site;
 - vi) The proposal would incorporate key sustainability initiatives in ecology, waste management, water, health and wellbeing, materials, pollution and surface water management in the design of the proposed development.

4. Site and surroundings

- 4.1 The application site hosts a detached two-storey dwelling fronting the south side of Slades Hill; west of Enfield Town. The existing house has been subject to small extensions to the rear elevation, a dormer roof extension within the eastern roof pitch and includes a detached vehicular garage. The site as existing has 2 vehicular access points off Slades Hill.
- 4.2 Slades Hill is a principal road and is predominantly characterised by mid-century residential detached and semi-detached dwellings within generally spacious plots.
- 4.3 The site is not located within a conservation area nor does it contain any listed or locally listed buildings.
- 4.4 The site has a PTAL rating of 2 (on a scale of 0-6 where 0 is the worst) of and it is located within the higher CIL rate Zone.

5. Proposal

- 5.1 This application proposes the minor variation of an existing planning permission. demolition of the existing dwelling house and re- development of the site to provide a new development comprising 6 residential units. Without the variation that is the subject of this report, the development would comprise 4 x. 2-beds and 2 x. 3-beds. If the variation is approved by Members, the development would comprise 5 x 2- beds and 2 x 3 beds.
- 5.2 No affordable housing is required because the number of units is below the threshold specified for such contributions in the National Planning policy Framework
- 5.3 The development would read principally as two storeys with accommodation within the roofspace and at lower ground level.

6. Relevant Planning History:

Reference	Proposal	Decision	Date
21/04783/FUL	Demolition of existing two storey dwelling and for the redevelopment of a two storey property with basement and accommodation in roofspace, for the provision of 6 self contained flats; with access via a crossover	Grant with conditions	23/02/2022
21/04115/FUL	Redevelopment of site and erection of a 2-storey single family dwellinghouse, involving basement level, accommodation in roofspace and a vehicle crossover.	Grant with conditions	20/12/2021
21/01666/CEA	Part single, part 2-storey rear extension together with, single storey side extension, and extension to roof at sides to form gable end on both sides with rear dormer	Granted	01/07/2021
20/00127/REFUSE	Erection of a 3 storey block with accommodation at basement level to provide 6 self contained flats (Relates to Appeal dismissed 14.04.2021 Planning Application Reference 20/01061/FUL)	Appeal dismissed	14.04.2021
20/00184/NONDET	Redevelopment of site and erection of a 3 storey block with accommodation at basement level to provide 6 self contained flats.	Appeal dismissed	14.04.2021
20/03003/FUL	Redevelopment of site and erection of a 3 storey block with accommodation at basement level to provide 6 self contained flats.	Refused	24.02.2021
20/01061/FUL	Erection of a 3 storey block with accommodation at basement level to provide 6 self contained flats	Refused	10.07.2020
19/03758/PREAPP	Proposed redevelopment of site to create 6 residential units.	Closed	07.02.2020
TP/09/1157	Redevelopment of site to provide a 2-storey block of 5 x 2-bed self contained flats with basement parking area, rooms in roof and new access to Slades Hill.	Granted with conditions	25.09.2009
PRE/09/0036	Proposed redevelopment by the erection of 5 x 2-bed flats within a 2-storey block, with basement car parking and accommodation in roof space.	Issued	06.08.2009
TP/08/1104	Redevelopment of site to provide a 3-storey block of 6 flats (5 x 2-bed and 1 x 1-bed) with basement parking and access ramp	Refused	13.08.2008

7. Consultation

Public

7.1 Consultation letters were issued to 12 neighbouring and nearby properties. In response 2 letters of objection were received raising all or some of the following points:

- Close to neighbouring buildings
- Overdevelopment of the site
- Out of character
- Inadequate parking provision
- Loss of light
- Loss of privacy
- Flooding Risk
- Noise nuisance
- Trees should be protected
- Strain on existing community facilities
- Increase in traffic

These points have been addressed in the report

7.2 External

Thames Water – No comment/objection received

7.3 Internal:

Transportation raise no objections on parking, and traffic generation grounds

Environmental Health raise no comment or objection to scheme

LLFA comments that: –

- i) Flooding
An improved Groundwater Flood Risk Assessment is required to be secured by planning condition
- ii) SuDS
An improved SuDS strategy is required to be secured by planning condition

8. Relevant Policies

National Planning Policy Framework (Updated July 2021)

8.1 The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:

- “.....(c) approving development proposals that accord with an up-to date development plan without delay; or,
- (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.”

- 8.2 The related footnote(8) advises that “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 or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.
- 8.3 The 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.
- 8.4 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”.
- 8.5 The Council’s recent housing delivery has been below its increasing housing targets. This 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.
- 8.6 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’.
- 8.7 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 200 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 8.8 Key relevant policy objectives in NPPF (2021) that relate to this scheme include:
- Section 5 – Delivering a sufficient supply of homes Para 60 - 77.
 - Section 11 – Making effective use of land Para 119 -125
 - Section 12 – Achieving well-designed places, Para 126-136

London Plan (2021)

8.9 The London Plan (2021) was agreed by the Secretary of State, Published and adopted on the 2nd of March 2021. The London Plan (2021) forms part of the development plan, and is the most up to date part of the development plan. As such it is given significant weight in the determination of planning applications. Some policies in the London Plan (2021) that are pertinent to this case are outlined below:

- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D14 Noise
- Policy G6 Biodiversity and access to nature
- Policy H1 Increasing housing supply
- Policy H2 Small sites
- Policy H10 Housing size mix
- Policy SI 1 Minimising Greenhouse gas emissions
- Policy S1 5 Water infrastructure
- Policy S1 7 Reducing waste and supporting the circular economy
- Policy S1 8 Waste capacity and net waste self-sufficiency
- Policy SI 13 Sustainable Drainage
- Policy T1 Strategic approach to transport
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.1 Residential parking
- Policy T7 Deliveries, servicing and construction

Local Plan – Overview

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

8.11 Core Strategy (2010)

- CP2 - Housing supply and locations for new homes
- CP3 - Affordable housing
- CP4 - Housing quality
- CP5 - Housing types
- CP6 - Meeting particular housing needs
- CP24 - The road network
- CP20 – Sustainable Energy Use and Energy Infrastructure
- CP21 - Sustainable Water Supply, Drainage and Sewerage Infrastructure
- CP22 – Delivering Sustainable Waste Management
- CP24 – The Road Network

- CP25 - Pedestrians and cyclists
- CP26 – Public Transport
- CP30 - Maintaining and improving the quality of the built and open environment
- CP36 – Biodiversity

8.12 Development Management Document (2014)

- DMD 3 Providing a Mix of Different Sized Home
- MD 4 Loss of existing residential use
- DMD 5 Residential Conversions
- DMD 6 Residential character
- DMD 7 Garden Land Development
- DMD 8 General Standards for new residential development
- DMD 9 Amenity Space
- DMD 11 Rear Extensions
- DMD 13 Roof Extensions
- DMD 37 Achieving high quality and design-led development
- DMD 38 Design Process
- DMD 45 Parking Standards and Layout
- DMD 47 Roads, access and servicing
- DMD 48 Transport assessments
- DMD 78 Nature Conservation
- DMD 79 Ecological Enhancements

8.13 Other Relevant Policy Considerations

- National Planning Policy Guidance
- London Housing SPG
- Nationally Described Space Standards
- Enfield Strategic Housing Market Assessment 2015

9. Analysis

Principle of Development

- 9.1 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. Paragraph 69 of the NPPF 2021 states Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 9.2 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. The current application would positively contribute to this if found acceptable and permission approved.
- 9.3 Policy H2 of the London Plan 2021 states Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making.
- 9.4 The principle of the redevelopment of the site to provide a new building containing 6 flats has already been established under the previously granted planning permission (ref: 21/04783/FUL) in February 2022. In considering that previous application, the height, scale and bulk of the building, and its resultant impacts on the character and appearance of the

area and the amenity of neighbouring and nearby residents has already been assessed and determined as acceptable.

- 9.5 Therefore, the main issue arising from this application is the impact of the provision of an additional unit of residential accommodation and whether there is any noticeable harm to the character of the locality or the amenities of neighbouring residential properties. There is no increase in footprint or floorspace and the proposed flat would occupy, within the previously approved built form, at lower ground floor level.
- 9.6 The table below shows the previously permitted schedule of accommodation under application ref 21/04783/FUL and how it relates to the requirements of the Nationally Described Space Standards:

Unit	Proposed Floorspace (sqm)	Required Floorspace (sqm)	Room Sizes Proposed (sqm)	Room Sizes Required (sqm)	Complies?
Flat 1 2 bed 4 person	91.7	61	14.9	11.5	Pass
			10.1	7.5	
Flat 2 2 bed 4 person	96.8	70	13.4	11.5	Pass
			15.8	11.5	
Flat 3 3 bed 6 person	173.9	95	14.2	11.5	Pass
			12.6	11.5	
			13.5	11.5	
Flat 4 2 bed 4 person	91.1	61	13.5	11.5	Pass
			11.4	7.5	
Flat 5 2 bed 4 person	90.5	61	16.7	11.5	Pass
			11.4	7.5	
Flat 6 3 bed 5 person	102	86	14.9	11.5	Pass
			13.2	7.5	
			7.6	7.5	

- 9.7 The above table confirmed that the proposed overall flats sizes and individual room sizes the minimum size standards required by the NDSS. The table below shows how the subdivision of the ground floor flat (previously Flat 3: now Flat 3 and Flat 3A) would change the quantity and mix of units within the proposal and, how this change relates to the standards required within the NDSS:

Unit	Proposed Floorspace (sqm)	Required Floorspace (sqm)	Room Sizes Proposed (sqm)	Room Sizes Required (sqm)	Complies?
Flat 1 2 bed 4 person	91.7	61	14.9	11.5	Pass
			10.1	7.5	
Flat 2 2 bed 4 person	96.8	70	13.4	11.5	Pass
			15.8	11.5	
Flat 3 2 bed 4 person	86.3	70	12.6	11.5	Pass
			12.3	11.5	
Flat 3A 3 bed 5 person	89.8	86	14.0	11.5	Pass
			11.5	11.5	
			7.5	7.5	
Flat 4 2 bed 4 person	91.1	61	13.5	11.5	Pass
			11.4	7.5	
Flat 5	90.5	61	16.7	11.5	Pass

2 bed 4 person			11.4	7.5	
Flat 6	102	86	14.9	11.5	Pass
3 bed 5 person			13.2	7.5	
			7.6	7.5	

- 9.8 Flat 3 as approved would be subdivided to create two flats: 3 and 3A. These would comprise a two bedroom and a three bedroom flat respectively. As a result, the proposed development would deliver an additional 2 bedroom 4 person flat whilst retaining a 3 bedroom flat. All units would have access to amenity space that meets the Council's standards.
- 9.9 The proposed development of 5 x 2 bedroom (4 person) and 2 x 3 bedroom (5 person) units would therefore provide a housing mix that contributes positively towards the housing needs of the Borough. In this regard, the development would be compliant with Policy CP5 of the Core Strategy, Policy DMD5 of the Development Management Document and Policy 3.3 and 3.4 of the London Plan, as well as the objectives of the NPPF and the London Housing SPG.
- 9.10 Accordingly, having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance the principle of a more intensive residential redevelopment of this site continues to be acceptable.

Character and Appearance

- 9.11 As stated earlier, the proposal would not result in any changes to the character and appearance of the scheme as permitted in February 2022 under application ref: 21/04783/FUL.
- 9.12 Consequently, it is considered the proposed development would not impact negatively on the street scene and would remain appropriate in keeping with the character of the area, in accordance with Policy D4 and D6 of the London Plan 2021, Policy CP30 of the Enfield Plan Core Strategy, DMD37 of the Enfield Development Management Document 2014, and the National Planning Policy Framework.

Neighbouring Amenity

- 9.13 The impacts upon the amenity of neighbouring residents was assessed under application ref: 21/04783/FUL and was considered to be acceptable. The proposed external built form would be unchanged in this proposal and would therefore not result in any additional impacts on neighbouring and nearby residents.
- 9.14 The proposal would result in the provision of one additional flat on the application site, seeing an increase from 6 units to 7 units. Given the provision of suitable refuse and car parking facilities to accommodate all of the proposed dwellings, it is considered that the potential increase in occupancy provided by one additional flat would not give rise to any significant amenity concerns for adjoining or nearby residents in terms of noise and disturbance.

Transport, Highways and Parking

- 9.15 Policy DMD Policy 8 requires that new residential development provides adequate parking while Policy DMD 45 indicates that parking proposals will be considered against various criteria including the London Plan standards, scale of development, public transport accessibility and existing parking pressures.

- 9.16 The previously approved scheme proposed 6 off street parking spaces for the 6 flats that were approved. The scheme now proposes 7 off-street vehicular parking spaces for 7 flats including a space for disabled parking, at the front of the site which is considered acceptable for the scale/unit mix proposed.
- 9.17 All of the spaces would allow vehicles to enter and leave the site in forward gear. All spaces comply with the minimum dimensions required. A condition is also proposed to ensure that electric vehicle charging infrastructure is installed; both active and passive for each parking space.
- 9.18 Based on the proposed housing mix, the development requires 14 no. cycle spaces. A condition is required to ensure the spaces and the technical specification for their secure storage is provided.
- 9.19 Refuse and Recycling storage facilities should be in line with the standards set out in the Refuse and Recycle Storage Guide Enfield (ENV 08/162). Adopted standards require a design which ensures that residents are not required to carry waste more than 30m (excluding any vertical distance) to the storage point, waste collection vehicles should be able to get within 25m of the storage point and the bins should be located no more than 10m from kerbside for collection. The proposed bin storage facilities are considered acceptable and a condition is required to ensure that details designs of the refuse and recycling storage comply with these standards.

Sustainable Drainage

- 9.20 London Plan policies 5.12 and 5.13 and London Plan (Intend to Publish) 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. Policies DMD59 ("Avoiding and reducing flood risk") confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere 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. DMD61 ("Managing surface water") requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.
- 9.21 A suite of pre commencement planning conditions are proposed to secure acceptable drainage and flood risk arrangements within the development.

Sustainable Design and Construction

Energy

- 9.22 Policy DMD 51 sets out the Councils energy efficiency standards. All developments will be required to demonstrate how the proposal minimises energy-related CO2 emissions in accordance with the following energy hierarchy:
- a. Maximising fabric energy efficiency and the benefits of passive design;
 - b. Utilising the potential for connection to an existing or proposed decentralised energy network in accordance with DMD 52 'Decentralised Energy Networks';
 - c. Demonstrating the feasibility and use of low or zero carbon technology in accordance with DMD 53 'Low and Zero Carbon Technology'; and, where applicable,
 - d. Financial contributions

- 9.23 Conditions aimed at securing an energy efficient development in line with the London plan and the Council's policies are to be imposed in a manner previously approved under previously granted planning permission under ref: 21/04783/FUL application

Biodiversity / Ecology

- 9.24 Policy 7.19 of the London Plan and Policy G6 of the London Plan (Intend to Publish) ("Biodiversity and access to nature") require development proposals to make a positive contribution, where possible, to the protection, enhancement, creation and management of biodiversity. Policy 36 of the Core Strategy confirms that all developments should be seeking to protect, restore, and enhance sites while Policy DMD79 advises that on-site ecological enhancements should be made where a development proposes more than 100sqm of floor space, subject to viability and feasibility.
- 9.25 Conditions aimed at protecting wildlife and enhancing biodiversity are proposed in a manner previously approved under previously granted planning permission under ref: 21/04783/FUL

Trees and Landscaping

- 9.26 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.
- 9.27 There are no trees covered by a TPO on the site and the existing trees along the boundaries were not affected by the previously approved proposal. The provision of an additional flat within the previously approved built form would not change this position.

10.0 S106 Contributions

- 10.1 The current proposal will result in a net gain of 6 residential units and therefore, in line with the Council's S106 SPD, is not liable to make a S106 contribution towards affordable housing or education.

11 Community Infrastructure Levy (CIL)

Mayoral CIL

- 11.1 The Mayoral CIL is collected by the Council on behalf of the Mayor of London. The CIL is calculated on basis of the net increase of gross internal floor area multiplied by an Outer London weighting of £60 per square metre.

Enfield CIL

- 11.2 The Enfield CIL is calculated on the basis of the net increase of gross internal floor area multiplied by one of three different area based rates of charge (Residential CIL Rates). The site falls within Enfield's Higher Rate Zone (RR4) at a rate of £120 per square metre. Therefore, in this case, with a net uplift of 245sqm, and no Social Housing CIL Relief, the proposal would generate £29,400 towards the Enfield CIL.

12. Equalities implications

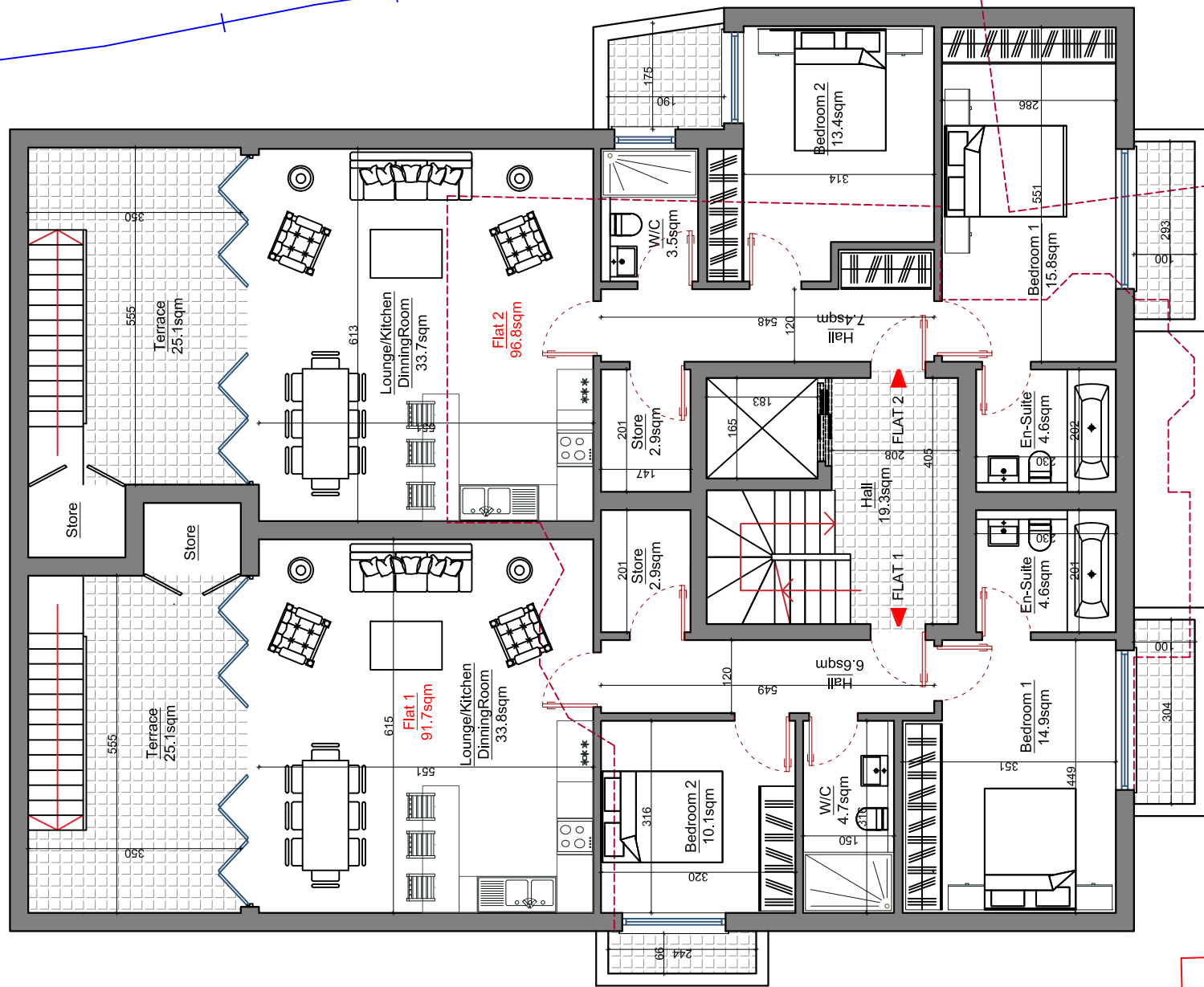
- 12.1 Section 149 of the Equalities Act 2010 places obligations on local authorities with regard to equalities in decision making. It is considered that the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act compared to those who do not have those characteristics.

13. Conclusion


- 13.1 The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF, states that planning permission should be granted unless “the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”.
- 13.2 The Government prescribes a “tilted balance” in favour of housing delivery to the Council’s planning decision-making as a result of Enfield’s current inability to demonstrate a 5-year housing land supply as well as the Council’s shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. Officers consider that the adverse impacts of the scheme, are not sufficient to significantly and demonstrably outweigh the benefits of the proposed housing.
- 13.3 It is recognised that sites such as this need to be optimised in order to minimise encroachment into the Borough’s Green Belt and protected Strategic Industrial Locations. It is considered that the social benefits, both in respect of the provision of high-quality new housing stock and other spatial and environmental enhancements carry weight linked to the scale of development, in favour of the proposed development.
- 13.4 Having regard to the assessment in this report, the development would provide 7 new homes: an uplift of 6 units. This would be consistent with the thrust of national planning policy and the development plan to optimise development on smaller sites and increase the delivery of new homes. Adverse impacts are not considered to significantly and demonstrably outweigh the scheme’s proposed benefits which is given weight commensurate with the number of units being delivered, when assessed against the policies in the NPPF, when taken as a whole.
- 13.6 Overall and giving weight to the need for development which provide new homes, it is concluded that the development for reasons set-out within this report including the extant grant of planning permission, accords with the development plan as a whole. The reasons for recommending approval of this application are:
- The proposed development would deliver new homes that would meet and exceed internal standards providing good quality residential accommodation and contribute towards meeting the Council’s strategic housing target;
 - The proposed development would optimise development of this site consistent with adopted and emerging policy;
 - Due to its size, design, form and appearance would appear acceptable in the street scene and the wider area;
 - The proposal would be unchanged in its physical appearance, and therefore its physical impacts upon the character and appearance and residential amenity of the area, when compared to the previously approved application for the redevelopment of the site (21/04783/FUL) is unaltered.
 - The proposal would provide adequate car parking, cycle parking, access and servicing provision and would not detract from the free flow and safety of vehicles, cyclists and pedestrians using the adjoining highways;

- The proposed development, would not detract from the biodiversity and ecological value of the site taking into account the mitigation secured and the benefits of the proposal;
- The proposal would incorporate key sustainability initiatives in ecology, waste management, water, and surface water management in the design of the proposed development.

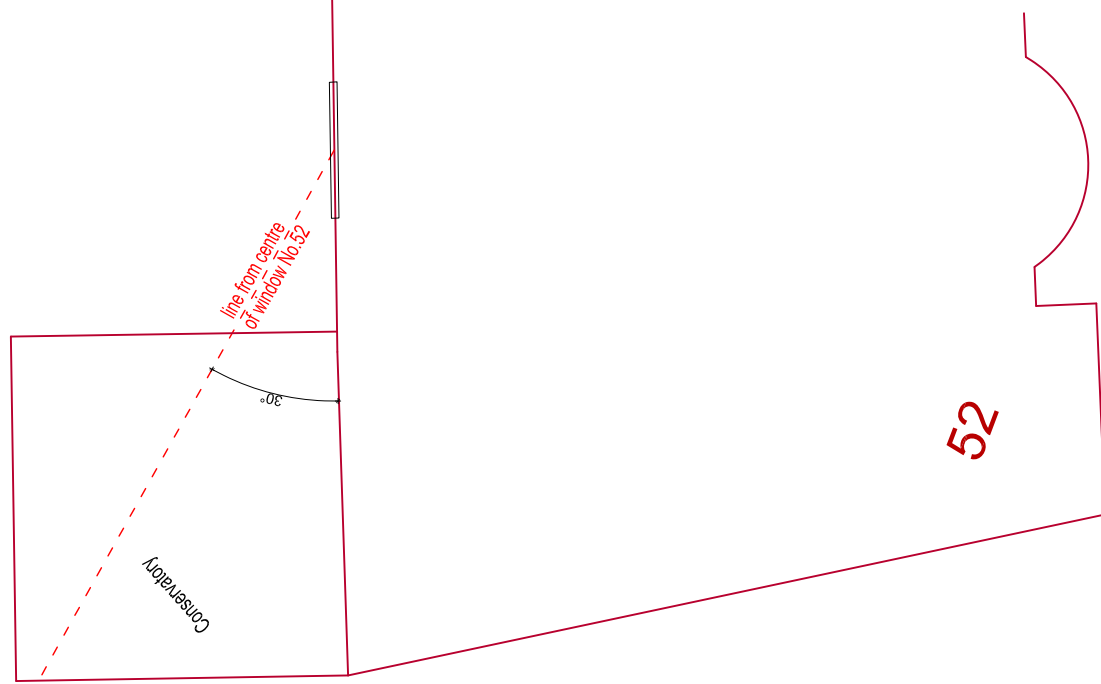
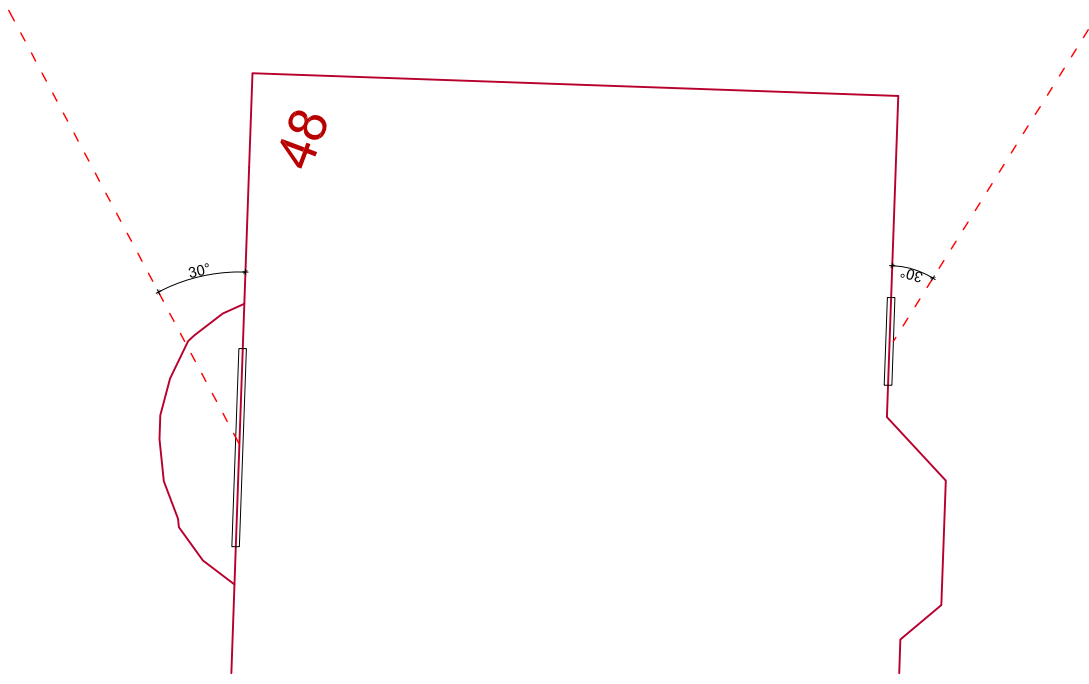
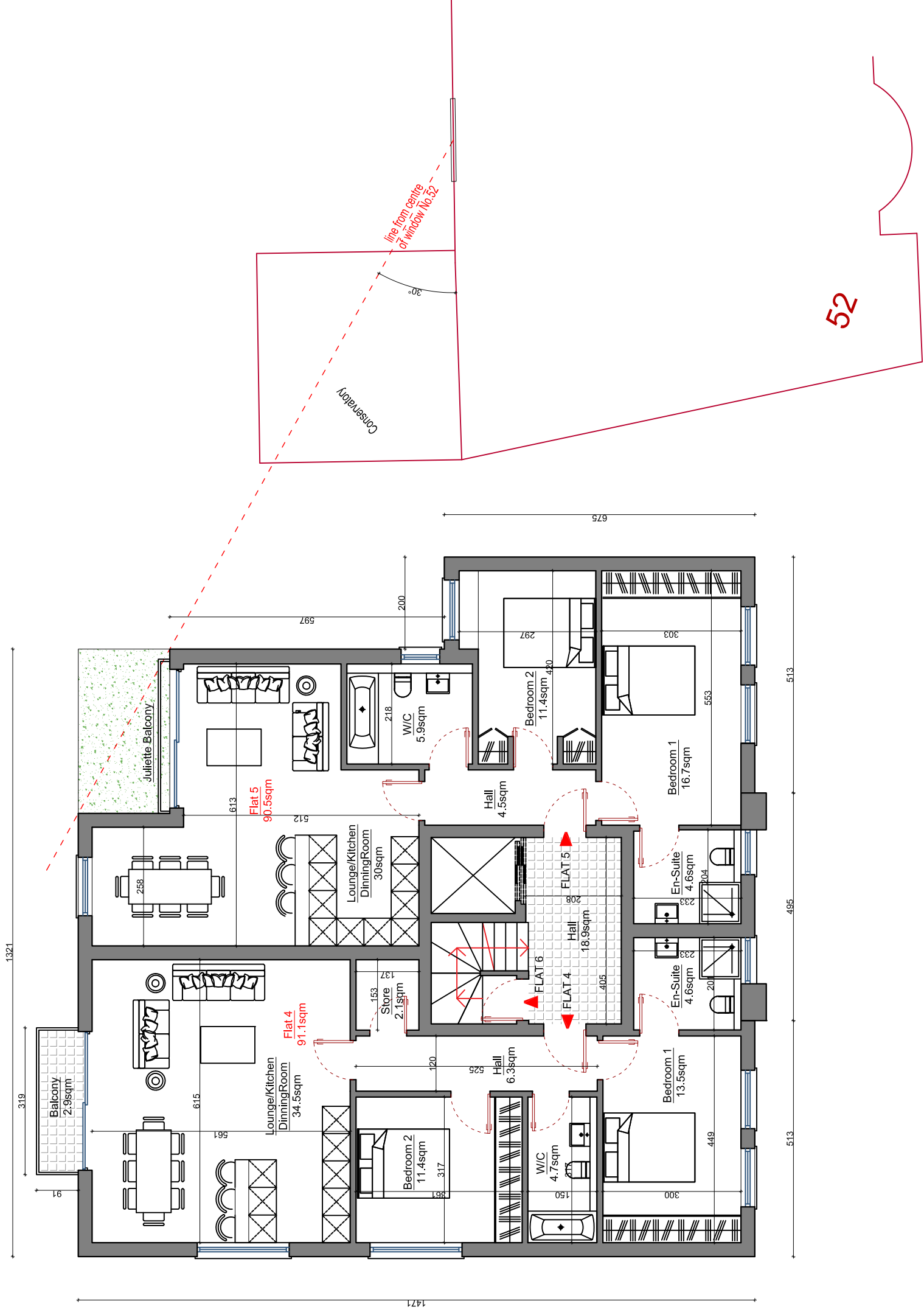
13.7 Having regard to the above assessment, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, subject to the appropriate mitigations as set out within the recommended condition schedule, and within the Section 106 Agreement, the application is recommended for approval.



01 Proposed Basement Floor Plan 207.8sqm

	NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London	CLIENT: Slades Hill Investments LTD	ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE	DRAWING TITLE: Proposed basement floor plan	PROJECT No: [blank] DATE: 30/11/2021 SCALE: 1:100 @A3 DRAWING No: 01	Reason for issue Consultation	Chk NT	NOTES: 0 500mm 2.5M 5M 250mm 1M
				REV.D	CURRENT REV			

First Floor plan
200.6sqm



03 Proposed First Floor Plan 200.6sqm

	NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London	CLIENT: Slades Hill Investments LTD	ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE	DRAWING TITLE: Proposed first floor plan	PROJECT No: DATE: SCALE: DRAWING No:	REASON FOR ISSUE: CONSULTATION	CHK: NT	NOTES: 0 500mm 2.5M 5M 250mm 1M
			DRAWING No: 03	CURRENT REV	REV.D			



07 Proposed Front Elevation



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENT:
Slades Hill
Investments LTD

ADDRESS:
50 Slades Hill
Enfield, LONDON
EN2 7EE

DRAWING TITLE:
Proposed front elevation

PROJECT No: 30/11/2021
DATE: 30/11/2021
SCALE: 1:100 @A3
DRAWING No: 07

Reason for issue	Chk
Consultation	NT

REV.D	REVISION

NOTES:



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENTS:
Stades Hill
Investments LTD

ADDRESS:
50 Stades Hill
Enfield, London
EN2 7EE

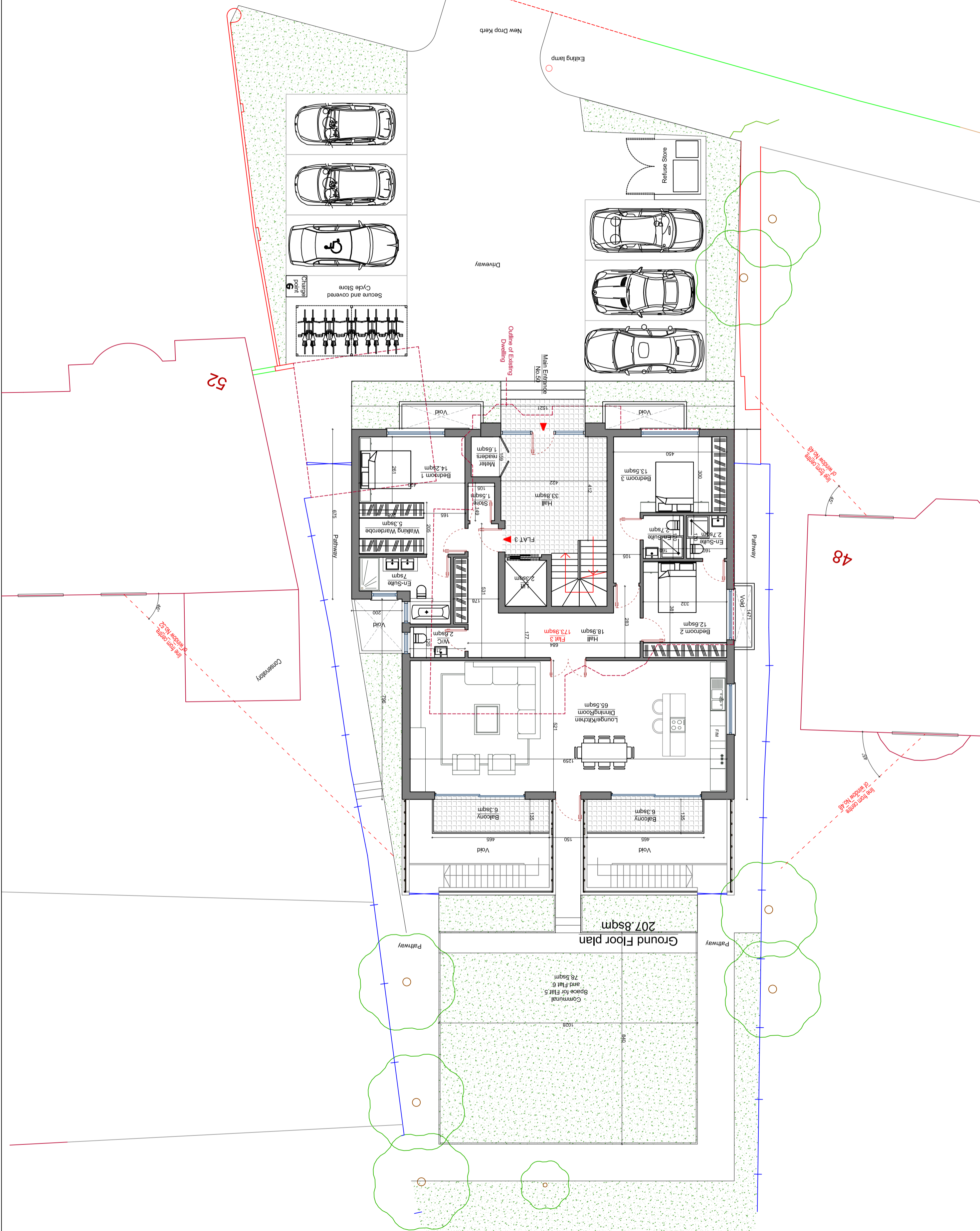
DRAWING TITLE:
Proposed ground
floor plan

PROJECT No: 02
DATE: 30/11/2021
SCALE: 1:100 @ A2
CURRENT REV: 02
REV D:

CHK: Consultation
NT: 0

NOTES:
Scale 1:100
500mm
2.5M
250mm 1M
5M

02 Proposed Ground Floor Plan 207.8sqm

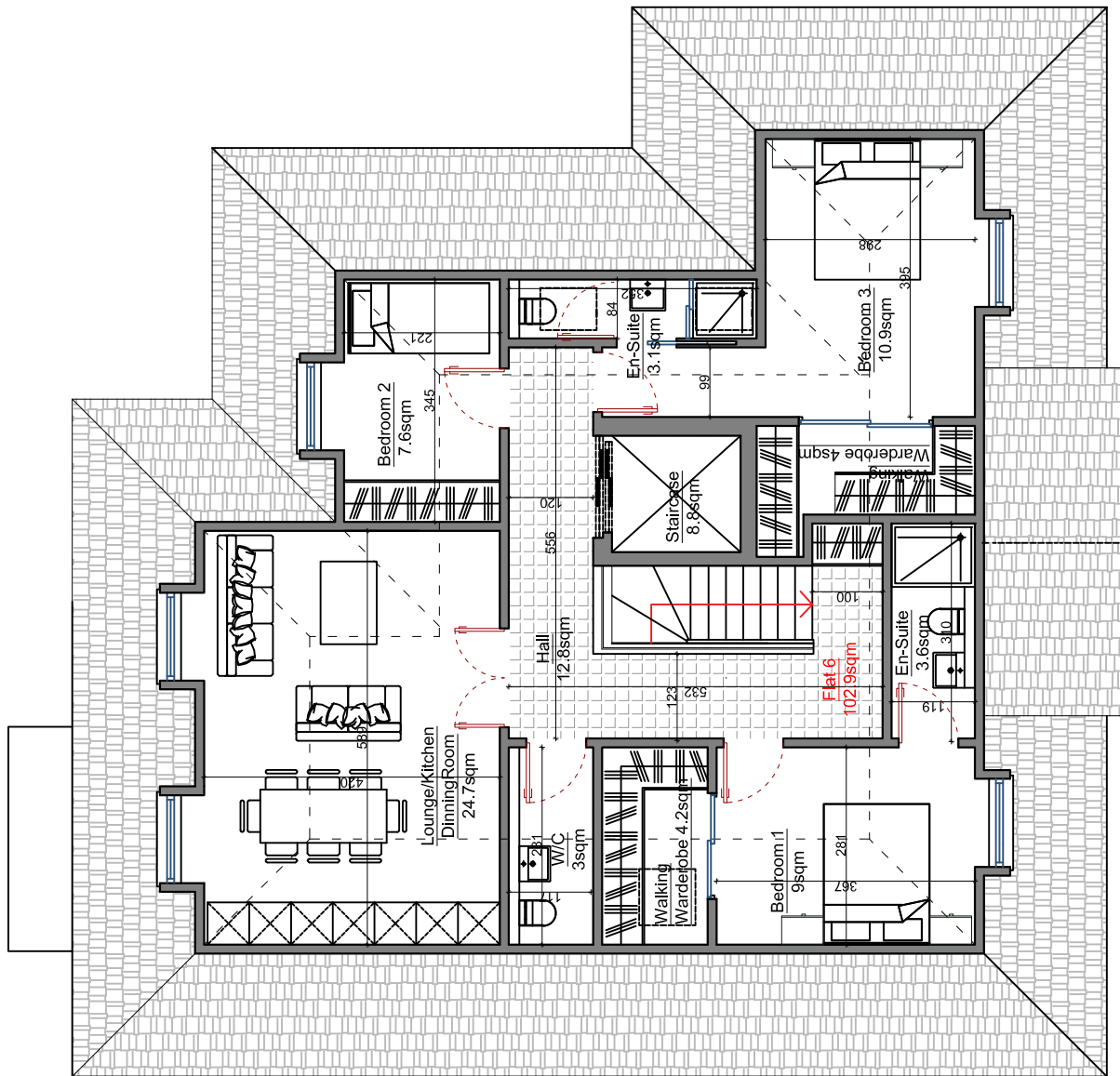


52

48

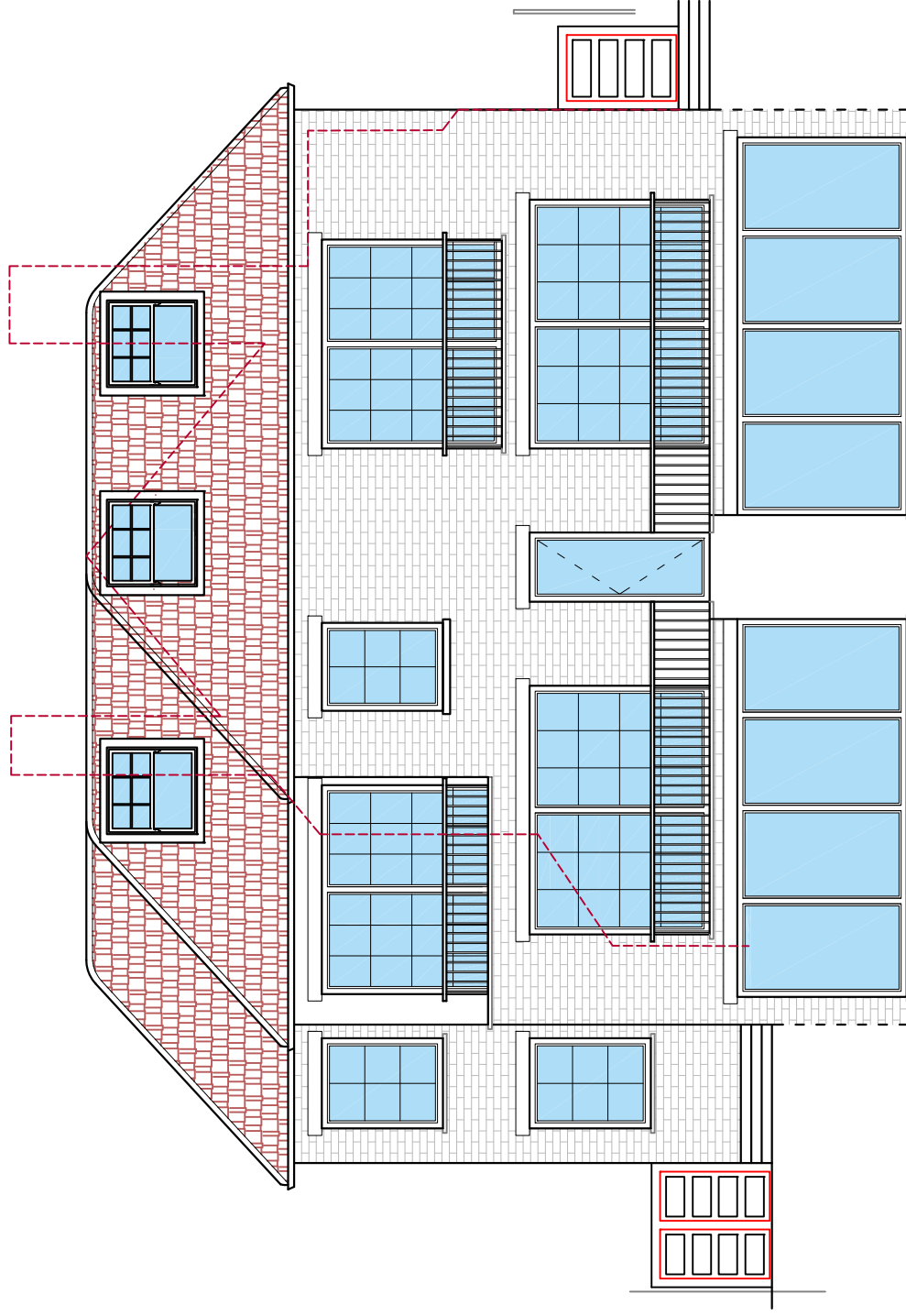
Ground Floor plan
207.8sqm

Loft plan
111.7sqm



04 Proposed Loft Plan 111.7sqm

	<p>NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London</p>	<p>CLIENT: Slades Hill Investments LTD</p>	<p>ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE</p>	<p>DRAWING TITLE: Proposed loft plan</p>	<p>PROJECT No: _____ DATE: 30/11/2021 SCALE: 1:100 @A3</p>	<p>Reason for issue Consultation</p>	<p>Chk NT</p>	<p>NOTES:</p>
						<p>0 500mm 2.5M 5M</p> <p>250mm 1M</p>		
				<p>DRAWING No: 04</p> <p>REV.D</p>				



06 Proposed Rear Elevation



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENT:
Slades Hill
Investments LTD

ADDRESS:
50 Slades Hill
Enfield, LONDON
EN2 7EE

DRAWING TITLE:
Proposed rear elevation

PROJECT No:
30/11/2021

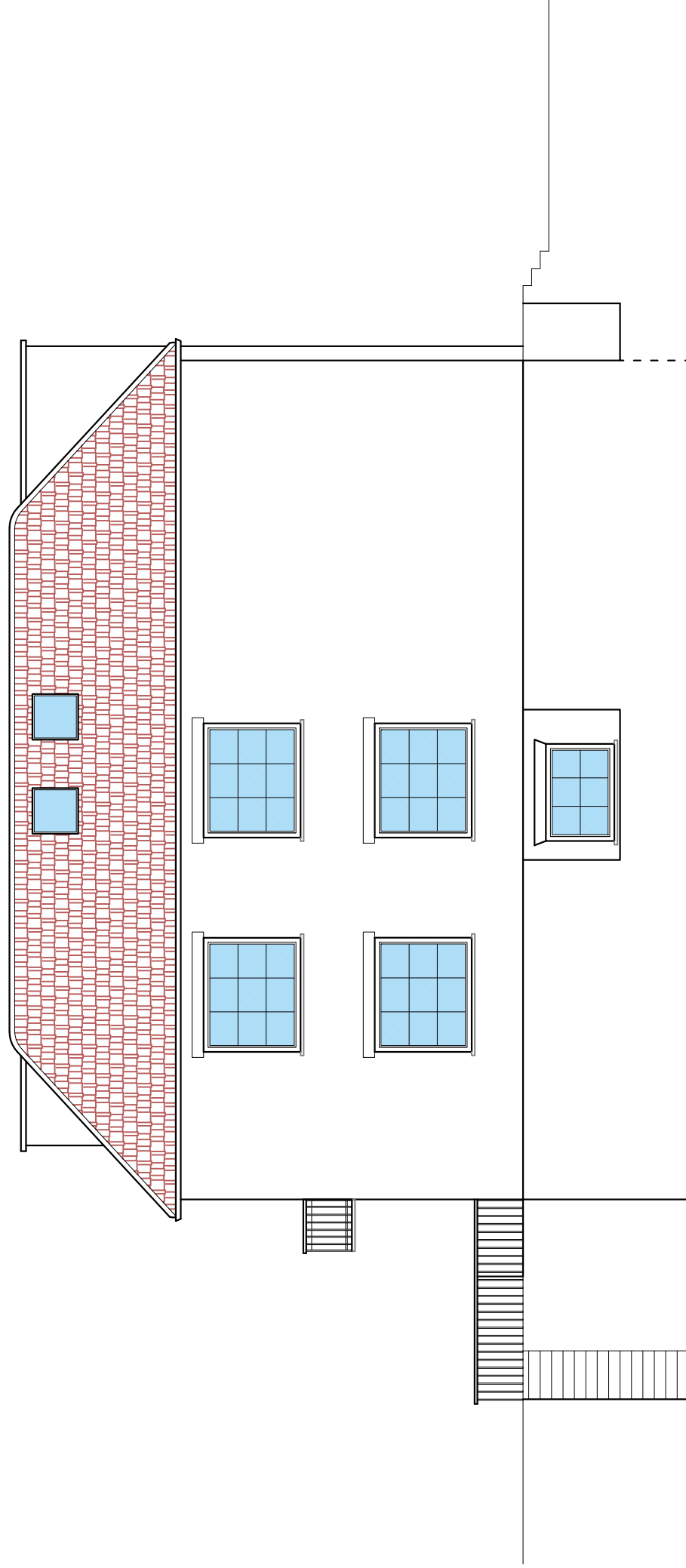
DATE:
30/11/2021

SCALE:
1:100 @A3

REASON FOR ISSUE:
Consultation

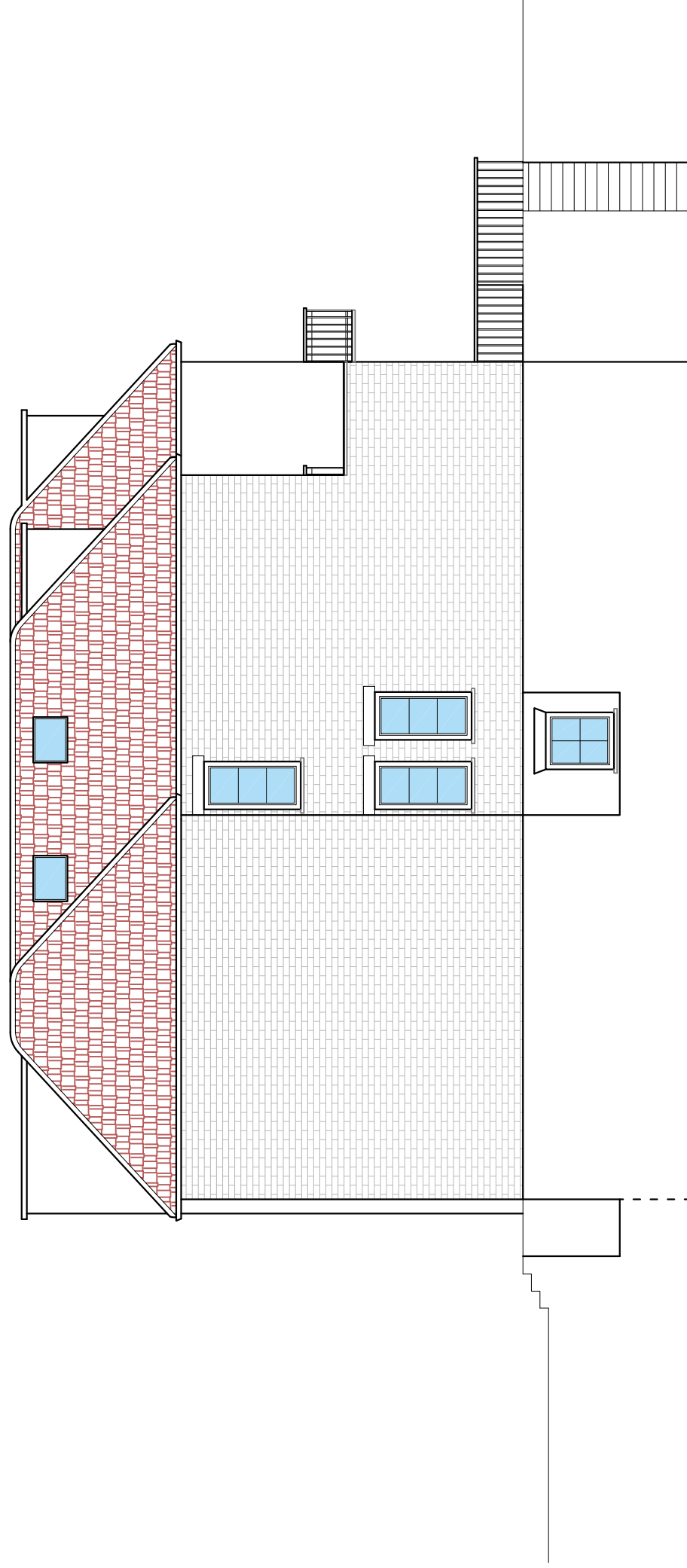
Rev	Rev.D	Rev.D
0	500mm	250mm 1M
1	2.5M	5M

NOTES:



09 Proposed Side Elevation

	CLIENT: Slades Hill Investments LTD	ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE	DRAWING TITLE: Proposed side elevation	PROJECT No: DATE: 30/11/2021	SCALE: 1:100 @A3	Reason for issue: Consultation	Chk NT	NOTES: 5M 2.5M 500mm 250mm 1M
	NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London	Slades Hill Investments LTD	50 Slades Hill Enfield, LONDON EN2 7EE	Proposed side elevation	DRAWING No: 09	CURRENT REV REV.D	Consultation	NT



08 Proposed Side Elevation

	<p>NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London</p>	<p>CLIENT: Slades Hill Investments LTD</p>	<p>ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE</p>	<p>DRAWING TITLE: Proposed side elevation</p>	<p>PROJECT No: 30/11/2021 DATE: 30/11/2021 SCALE: 1:100 @A3 REASON FOR ISSUE: Consultation CHK: NT</p>	<p>REASON FOR ISSUE: Consultation CHK: NT</p>	<p>NOTES: 5M 2.5M 500mm 250mm 1M</p>
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12 Proposed Street Scene



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENT:
Slades Hill
Investments LTD

ADDRESS:
50 Slades Hill
Enfield, LONDON
EN2 7EE

DRAWING TITLE:
Proposed Street Scene
Remains the same as previous
approval, Ref:21/04783/FUL

PROJECT No:
29/04/2022

DATE:
29/04/2022

SCALE:
1:100 @A3

REASON FOR ISSUE:
Consultation

CHK:
NT

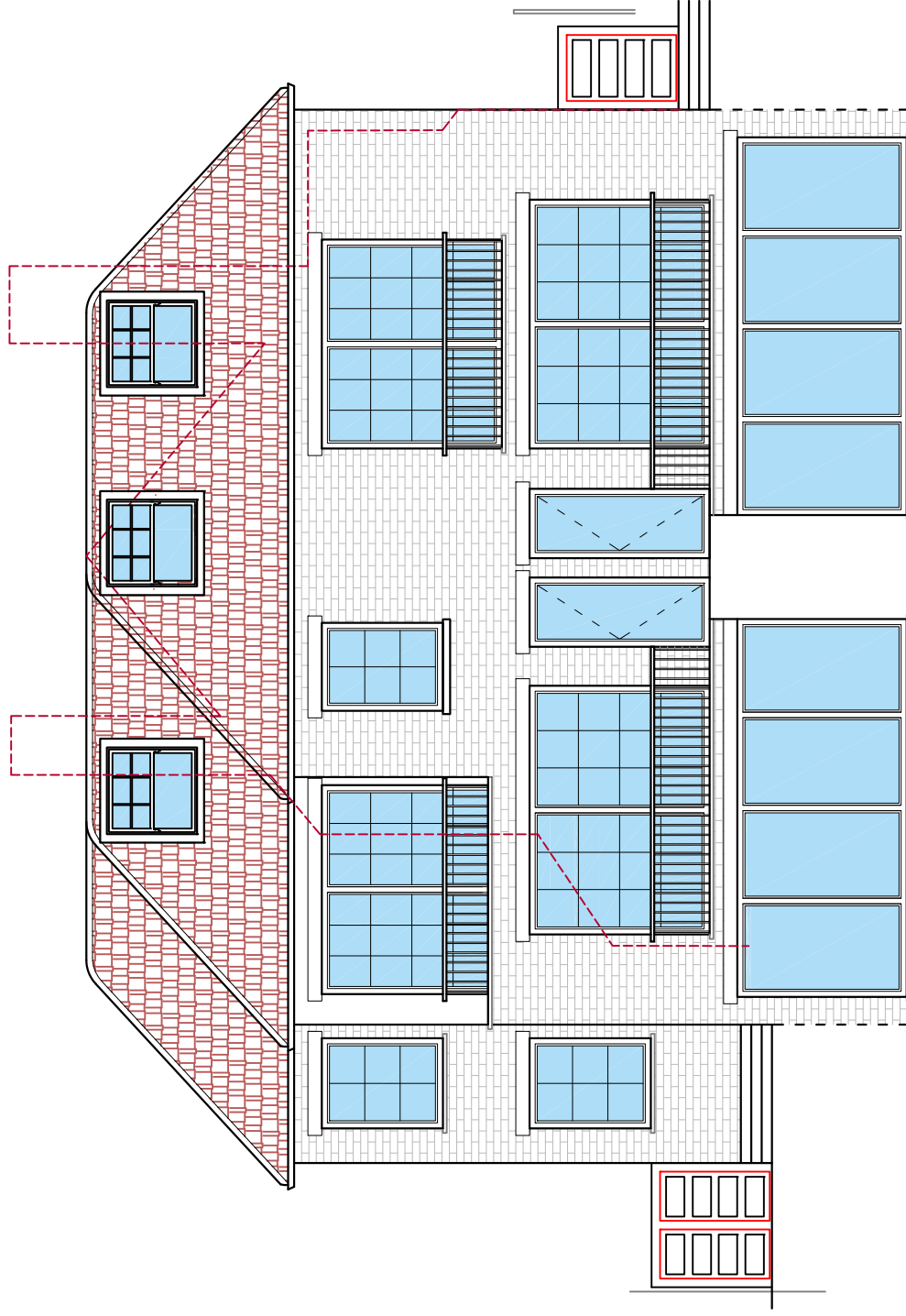
12

CURRENT REV

REV. "A"

NOTES:





06 Proposed Rear Elevation



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENT:
Slades Hill
Investments LTD

ADDRESS:
50 Slades Hill
Enfield, LONDON
EN2 7EE

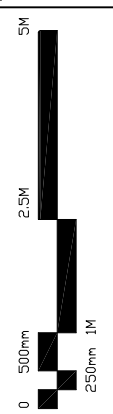
DRAWING TITLE:
Proposed rear elevation

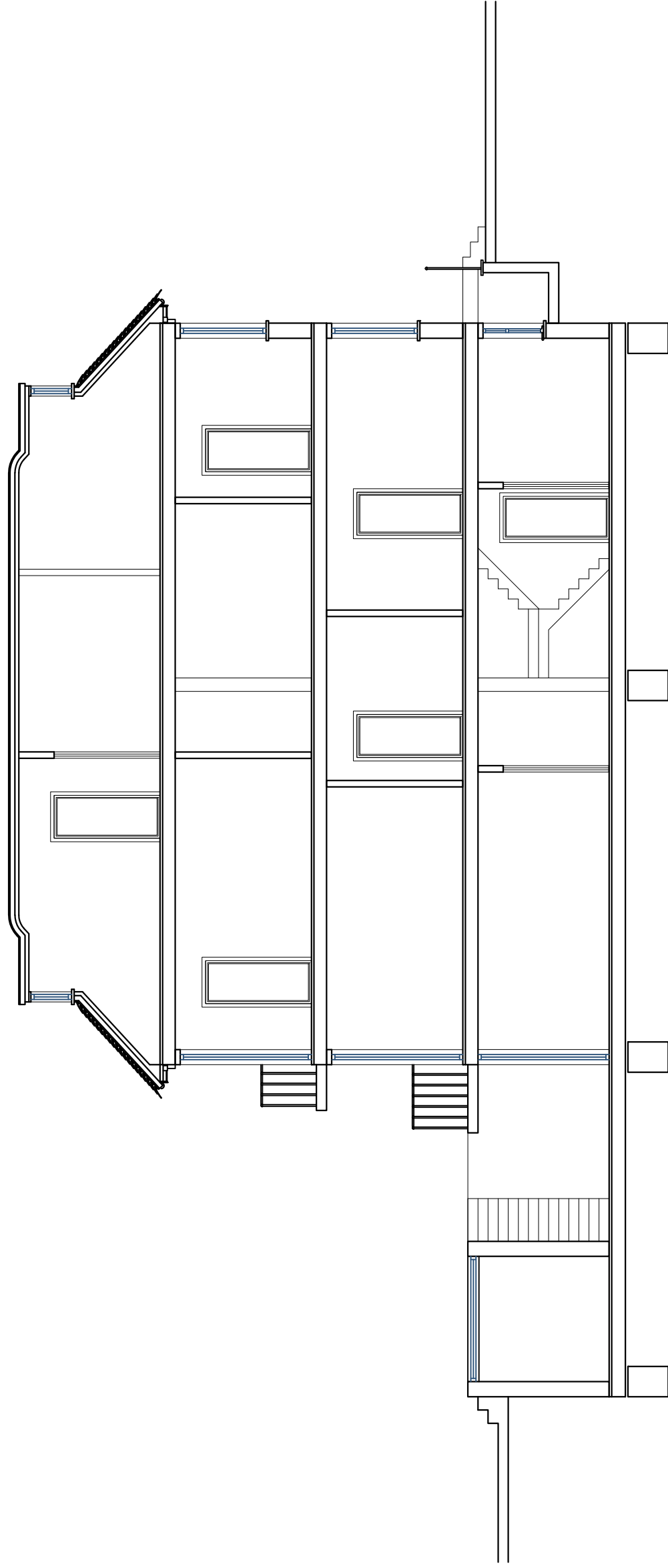
PROJECT No: 29/04/2022
DATE: 29/04/2022
DRAWING No: 06

SCALE: 1:100 @A3
Reason for issue: Submission

Chk	Reason for issue
NT	Submission

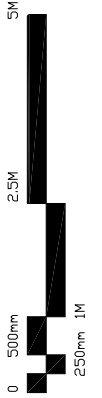
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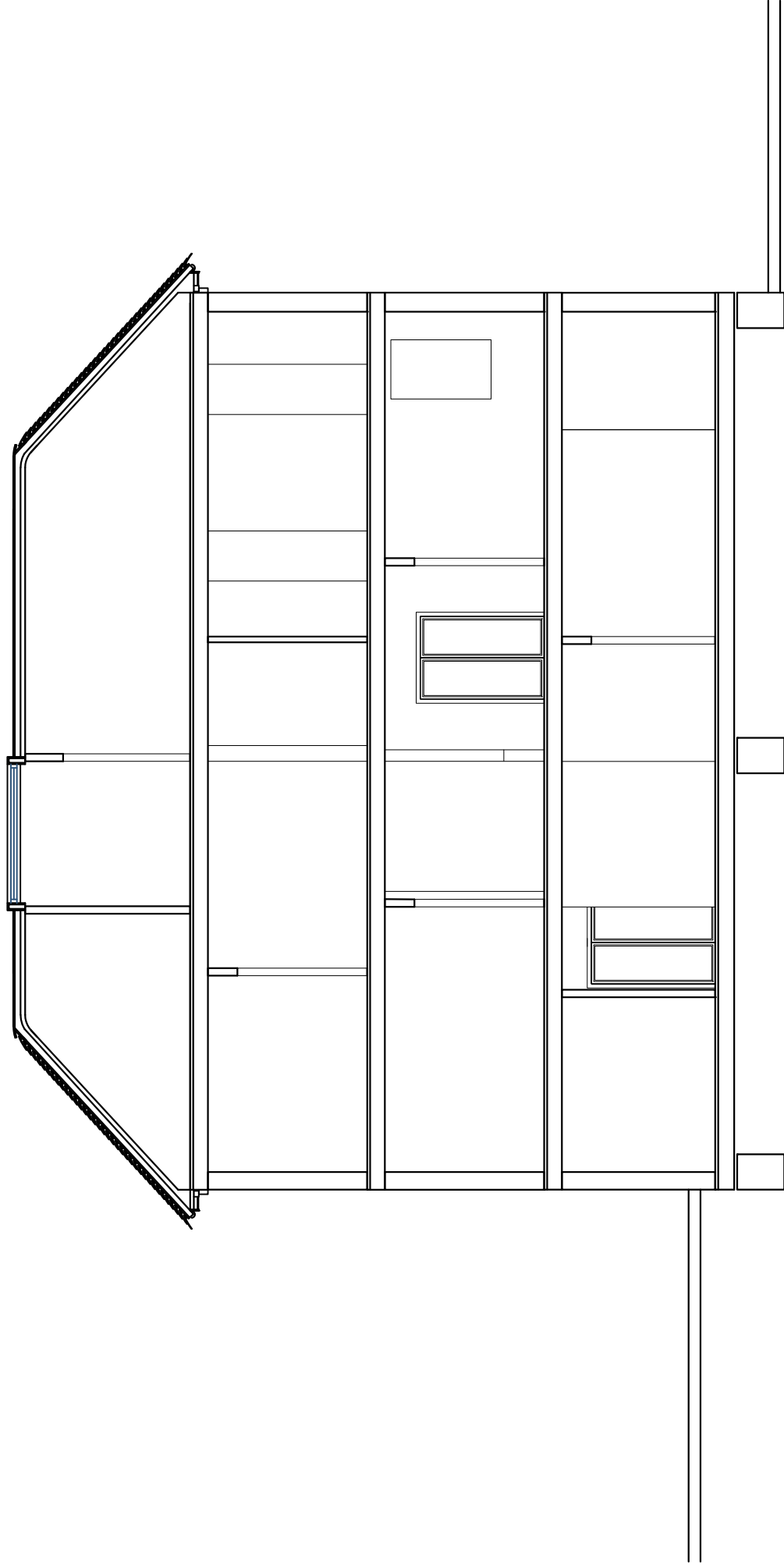





10 Proposed Section "A"

	<p>NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London</p>	<p>CLIENT: Slades Hill Investments LTD</p>	<p>ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE</p>	<p>DRAWING TITLE: Proposed section "A" Remains the same as previous approval, Ref:21/04783/FUL</p>	<p>PROJECT No: 29/04/2022</p> <p>DATE: 29/04/2022</p> <p>DRAWING No: 10</p>	<p>SCALE: 1:100 @A3</p> <p>Reason for issue: Consultation</p>	<p>CHK NT</p>	<p>NOTES:</p>
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11 Proposed Section "B"

	NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London	CLIENT: Slades Hill Investments LTD	ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE	DRAWING TITLE: Proposed section "B" Remains the same as previous approval, Ref:21/04783/FUL	PROJECT No: DATE: 29/04/2022	SCALE: 1:100 @A3 CURRENT REV REV. "A"	Reason for issue Consultation	Chk NT	NOTES: 5M 2.5M 500mm 250mm 1M
					DRAWING No: 11				



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENT:
Stades Hill
Investments LTD

ADDRESS:
50 Stades Hill
Enfield, LONDON
EN2 7EE

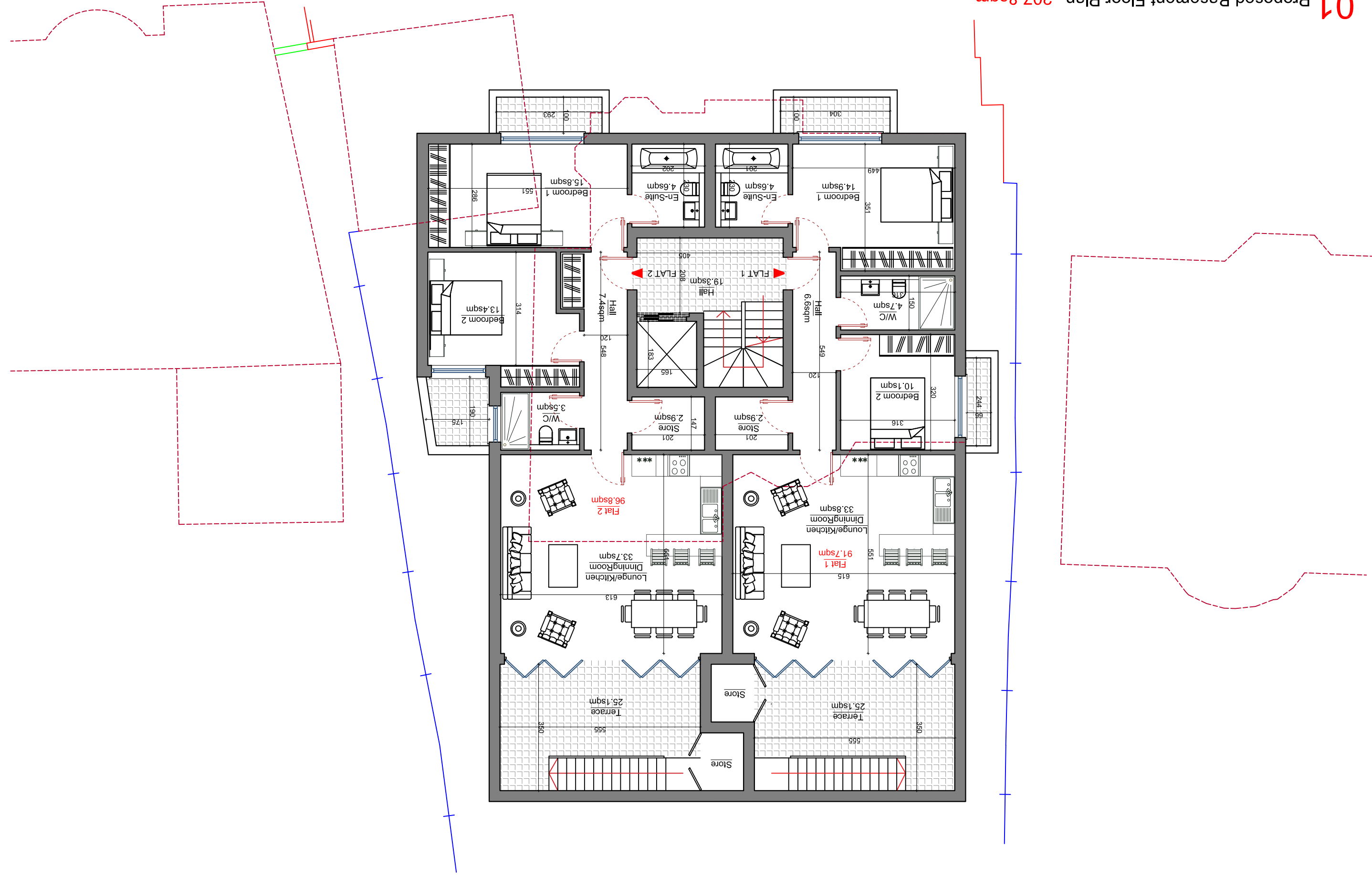
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Proposed basement
floor plan

PROJECT No: 30/11/2021
DATE: 30/11/2021
SCALE: 1:100 @A3
CURRENT REV: 01
REV.D

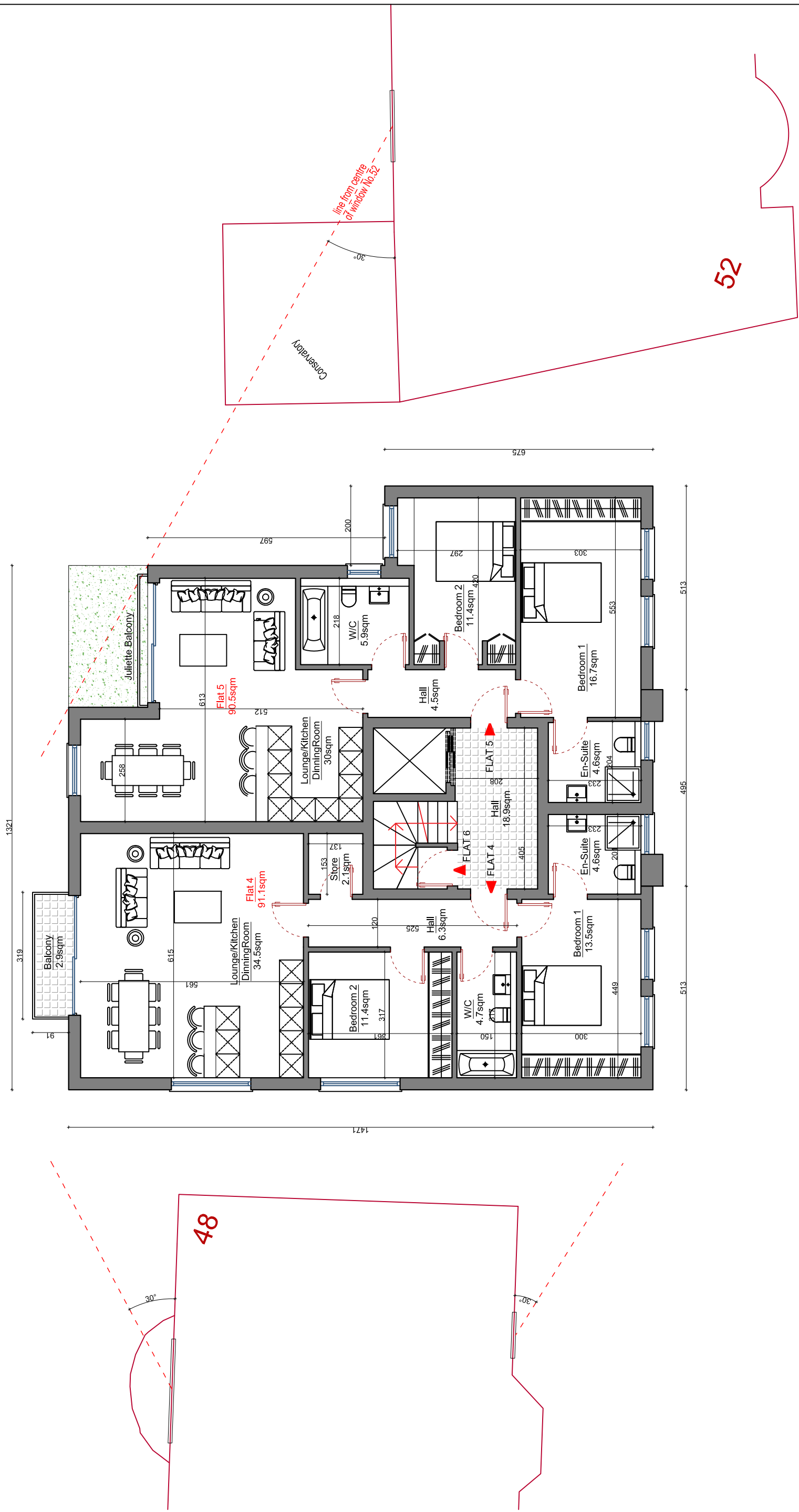


NOTES:

01 Proposed Basement Floor Plan **207.8sqm**



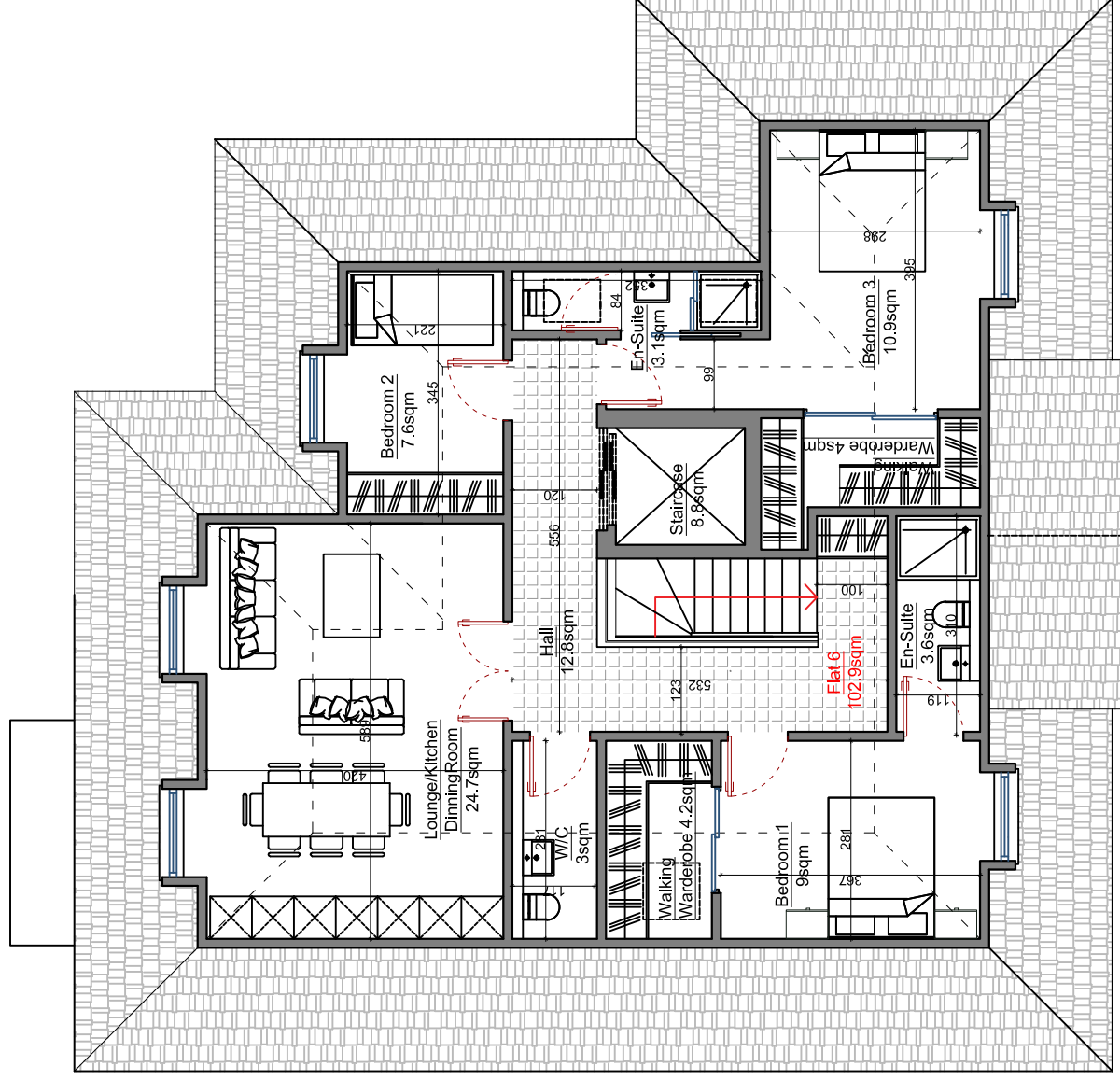
First Floor plan
200.6sqm



03 Proposed First Floor Plan 200.6sqm

	<p>NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London</p>	<p>CLIENT: Slades Hill Investments LTD</p>	<p>ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE</p>	<p>DRAWING TITLE: Proposed first floor plan</p>	<p>PROJECT No: 03 DATE: 30/11/2021 SCALE: 1:100 @A3 REVISION: CURRENT REV</p>	<p>Reason for issue Consultation</p>	<p>Chk NT</p>	<p>NOTES: 5M 2.5M 500mm 250mm 1M</p>
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Loft plan
111.7sqm



04 Proposed Loft Plan **111.7sqm**



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENT:
**Slades Hill
Investments LTD**

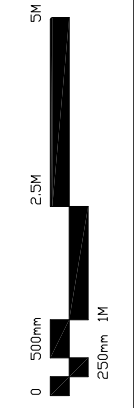
ADDRESS:
**50 Slades Hill
Enfield, LONDON
EN2 7EE**

DRAWING TITLE:
Proposed loft plan



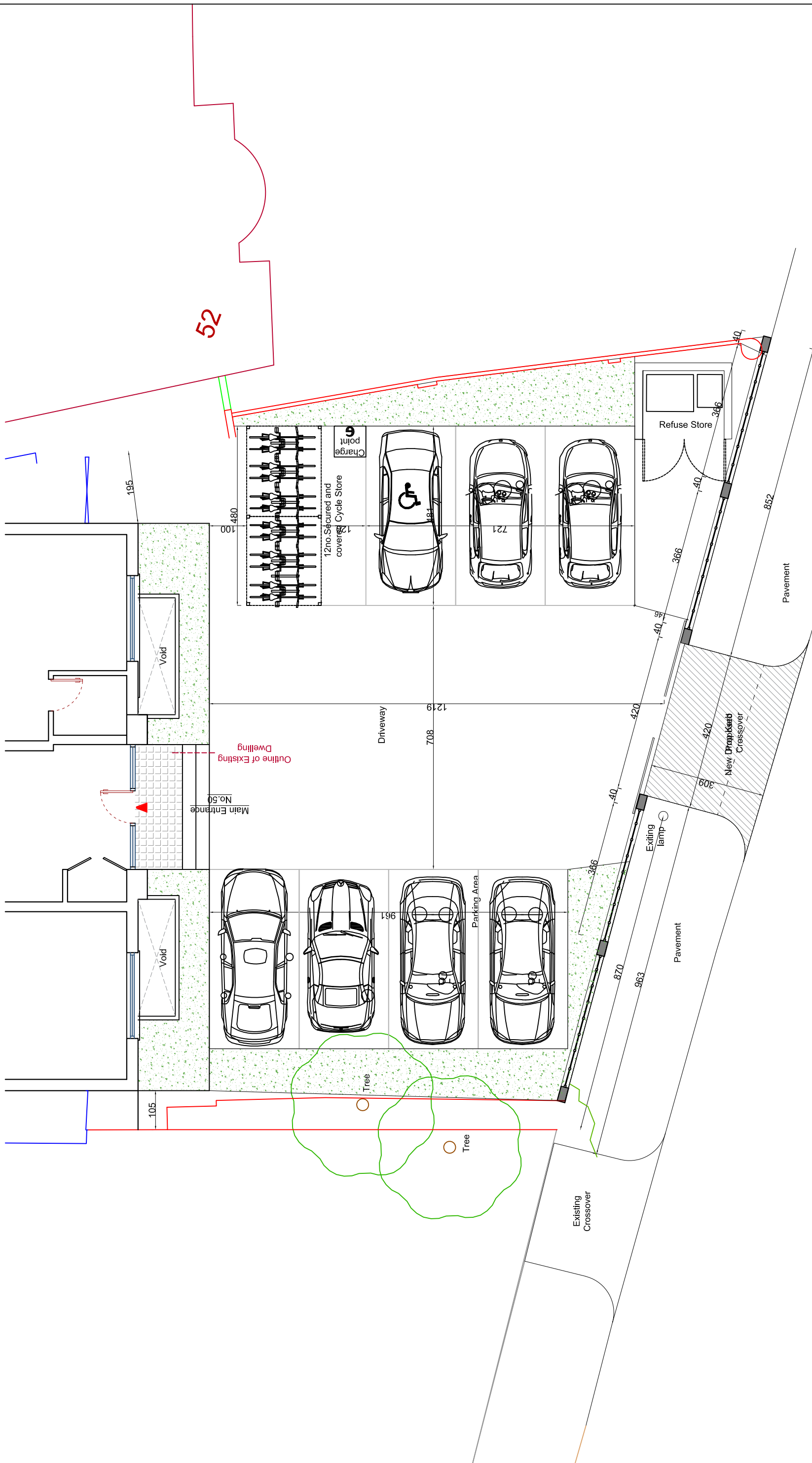
PROJECT No: 30/11/2021
DATE: 30/11/2021
SCALE: 1:100 @A3
DRAWING No: 04
REVISION: CURRENT REV

Reason for issue	CHK
Consultation	NT



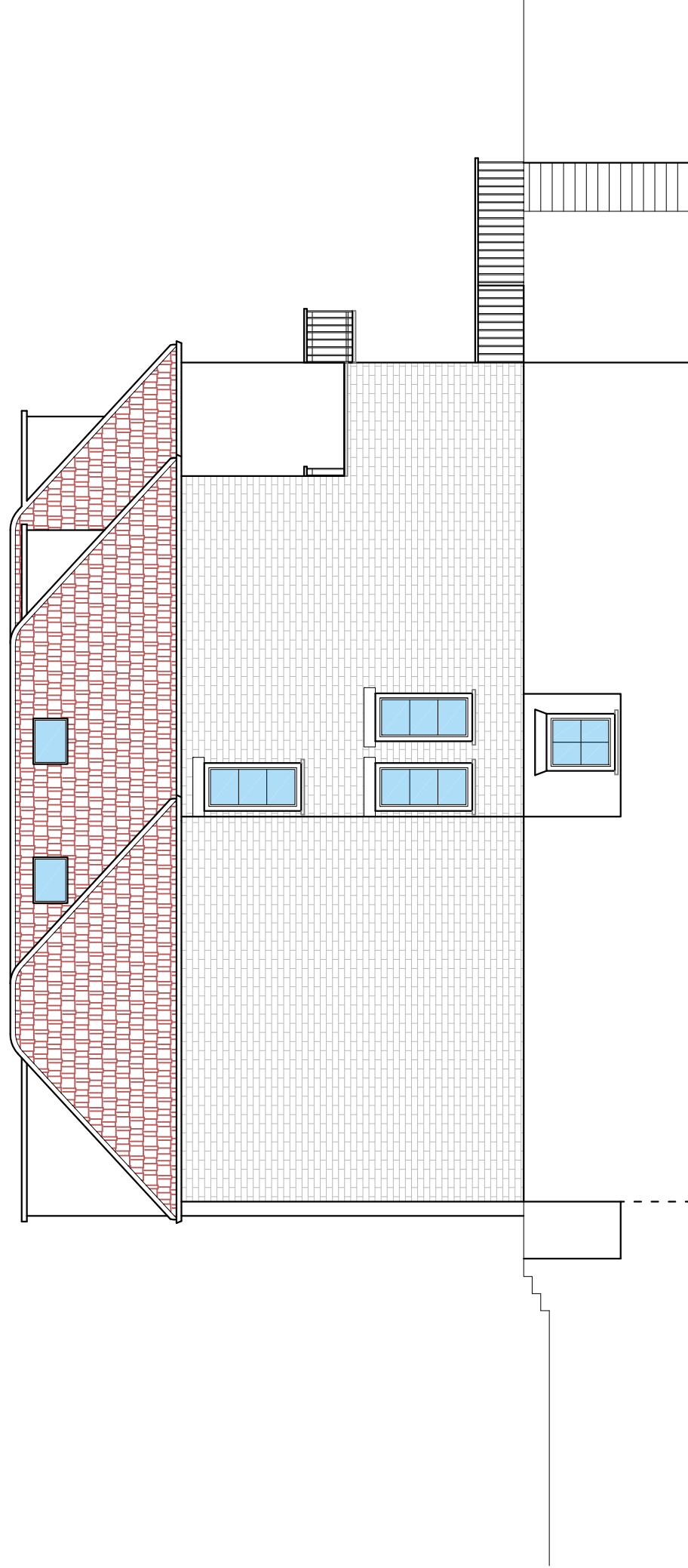
NOTES:

REV	DATE	BY	CHK
5H			
2.5M			
1M			



29 Proposed Driveway and Front Garden

<p>NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London</p>	<p>CLIENT: Slades Hill Investments LTD</p>	<p>ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE</p>	<p>DRAWING TITLE: Proposed Driveway and Front Garden</p>	<p>PROJECT No: 30/11/2021 DATE: 30/11/2021 SCALE: 1:100 @A3</p>	<p>Reason for issue: Consultation CHK: NT</p>	<p>NOTES:</p> <p>0 500mm 2.5M 5M 250mm 1M</p>
<p>DRAWING No: 29 REV. "A"</p>				<p>REASON FOR ISSUE: Consultation CHK: NT</p>	<p>REVISIONS:</p>	<p>NOTES:</p>



08 Proposed Side Elevation



NEVILA TANE
Architectural technician
2 Meridian Close, Mill Hill, London

CLIENT:
Slades Hill
Investments LTD

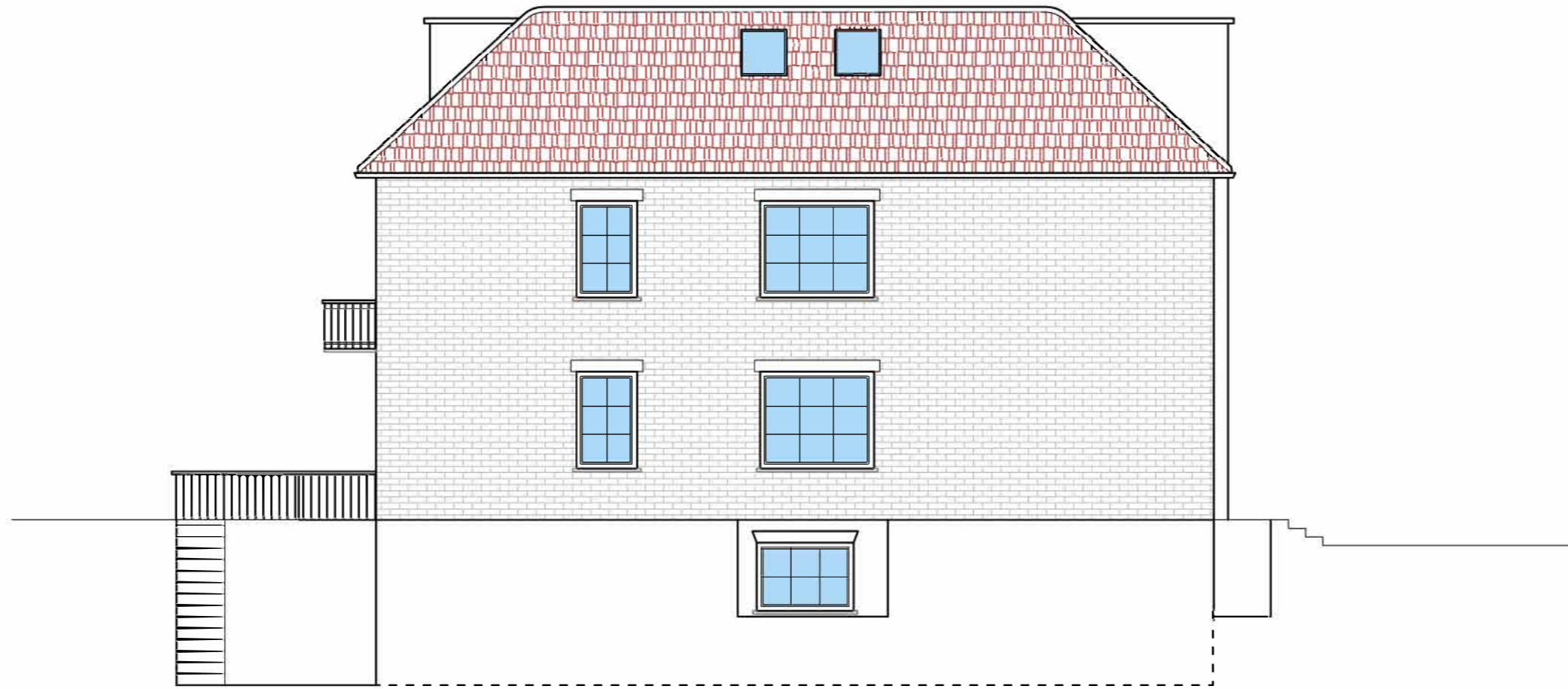
ADDRESS:
50 Slades Hill
Enfield, LONDON
EN2 7EE

DRAWING TITLE:
Proposed side elevation
Remains the same as previous
approval, Ref:21/04783/FUL



PROJECT No: 29/04/2022
DATE: 29/04/2022
DRAWING No: 08

SCALE: 1:100 @A3
REASON FOR ISSUE: Consultation
CHK: NT

NOTES:
0 500mm 2.5M 5M
250mm 1M



09 Proposed Side Elevation

	NEVILA TANE Architectural technician 2 Meridian Close, Mill Hill, London	CLIENT: Slades Hill Investments LTD	ADDRESS: 50 Slades Hill Enfield, LONDON EN2 7EE	DRAWING TITLE: Proposed side elevation Remains the same as previous approval, Ref:21/04783/FUL	PROJECT No: DATE: 29/04/2022	SCALE: 1:100 @A3	Reason for issue Consultation	Chk NT		NOTES:
					DRAWING No: 09	CURRENT REV REV. "A"				

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 18 October 2022
Report of Head of Planning - Vincent Lacovara	Contact Officer: Andy Higham Allison De Marco Lap Pan Chong	Ward: Whitewebbs
Ref: 22/01625/RE4		Category: Full Application (Major)
LOCATION: 263 Bullsmoor Lane Enfield EN1 4SF (Appendices to this report are published as a separate document)		
PROPOSAL: Erection of part 3, part 4, part 6 storey block of 29 self-contained flats with associated access, car parking, landscaping, cycle and bin storage		
Applicant Name & Address: London Borough of Enfield Housing Civic Centre Silver Street EN1 3XY		Agent Name & Address: Montagu Evans LLP 70 St Mary Axe London EC3A 8BE
RECOMMENDATION: 1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, and subject to the finalisation of a shadow Section 106 Agreement to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to GRANT planning permission subject to conditions 2. That the Head of Development Management be granted delegated authority to finalise the wording of the shadow Section 106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.		

1. Note for Members

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

2. Executive Summary

- 2.1. This report provides an assessment of the proposed scheme involving the erection of a part 3, part 4, part 6 storey block of 29 x London Affordable Rent homes including 15 x 1 bed 2-person homes (52%), 5 x 2 bed 4-person homes (17%), and 9 x 3 bed 5+person homes (31%). 10% of new homes (3 homes) will be wheelchair accessible.
- 2.2. The application proposes high-quality residential homes on existing brownfield land, which sits within a recently established residential quarter.
- 2.3. The site benefits from an unimplemented planning permission for part 3, part 4 storey block of 27 flats (ref: 17/05227/FUL) which was granted in 2019.
- 2.4. There is a pressing need for housing, including affordable housing in the Borough, and Enfield has a challenging 10-year housing delivery target. The application proposes 29 x London Affordable Rent homes which is a significant contribution to the affordable housing stock for lower income households in the borough.
- 2.5. The principle of housing intensification at this location has been established by the unimplemented planning permission (ref: 17/05227/FUL) which is a material planning consideration. Officers consider the current Planning Application represents an improvement in comparison with the previously approved scheme.
- 2.7. The proposed development is considered to be sympathetic to the character and appearance of the area and the amenities of neighbouring properties.
- 2.8. The scheme's additional public benefits can be summarised as follows:
- Significant uplift of the delivery of affordable and family homes - 29 London Affordable Rent homes including 9 family homes, making a significant contribution to the Borough's affordable housing delivery.
 - 100% dual aspect homes with generous internal floor space, high floor to ceiling height, ample natural light, satisfactory indoor air quality and acoustic performance
 - Enhanced landscape and biodiversity including safer and more calming communal and private amenity spaces and substantial green wall facing the New River.
 - Achieving low embodied carbon emissions and exemplar operational carbon emissions which would help address fuel poverty.
 - More sustainable on-site urban drainage with extensive use of rain gardens, planters and permeable paving
 - Improved vehicular access and traffic flow on Bullsmoor Lane
 - S106 contributions towards improvements to local area play provision and public realm on Bullsmoor Lane.
- 2.9. Furthermore, it has been recognised that:

- By virtue of its size, location, and proximity, the development would not adversely affect the amenity of neighbouring residents.
- The proposals would not cause any unacceptable harm to highway safety or the flow of traffic in the locality.

- 2.10. The London Borough of Enfield (LBE) Housing Team is seeking to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This includes delivery of affordable homes through Modern Methods of Construction (MMC).
- 2.11. The development would be appropriate and broadly in accordance with the Development Plan (Adopted London Plan 2021, Core Strategy and Development Management Policies) and relevant National Planning Policy Framework 2021 (NPPF) policies.

3. Recommendation

- 3.1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, and subject to the finalisation of a shadow Section 106 Agreement to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to GRANT planning permission subject to conditions to cover matters set out below:

1. Grampian condition to require shadow s106 to be entered into
2. Compliance with S106 Obligations
3. Time limit
4. Approved plans
5. Proposed Levels
6. Revised internal layout of Unit 19 and 26
7. Revised Construction and Logistics Plan
8. Revised Sustainable Drainage Strategy
9. Contamination verification report
10. Written scheme of investigation (WSI)
11. Detailed drawings and sample materials
12. Balconies details
13. Landscaping and play space
14. Piling Method Statement
15. Land Contamination Strategy
16. Details of the low carbon technologies
17. Details of surfacing materials
18. Details of cycle store
19. Details of electric charging points
20. Details of external lighting
21. Energy Performance Certificate
22. Drainage strategy verification report
23. Security by Design Standards
24. Details of biodiversity enhancement

Compliance conditions

25. Housing mix
26. Pedestrian and vehicular access
27. Sole use of the car parking spaces
28. No loading and unloading of goods other than within the service bay

29. Fire safety measures
30. Noise attenuation measures
31. Air quality
32. Emissions from non-road mobile machinery
33. Water efficiency measures
34. Waste strategy
35. Overheating measures
36. External plants noise limit
37. Permitted Development rights restrictions

3.2. That the Head of Development Management be granted delegated authority to finalise the wording of the shadow Section 106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

4. Site & Surroundings

- 4.1 The site is currently vacant, and the single storey chalet bungalow previously on site has been demolished. The site benefits from an unimplemented planning permission for redevelopment into a part 3, part 4 storey block of 27 flats (ref: 17/05227/FUL).
- 4.2 The site is bordered on the eastern side by the Great Cambridge Road (A10) and on the southern side by Bullsmoor Lane. The site is currently accessed via a crossover on Bullsmoor Lane.
- 4.3 To the north of the site is Bells Moor Gardens, a recently completed residential development consisting of 2 x 4-storey apartment blocks, 14 x 2-3 storey houses and a lawn area immediately adjacent to the site. Bells Moor Gardens is accessed via Copse Close which is an ungated private road, off Bullsmoor Lane. To the south, there are mainly two storey residential properties on the opposite side of Bullsmoor Lane.
- 4.4 The site is bordered to the west by the New River which is designated as Site of Metropolitan Importance for Nature Conservation (SINC), Wildlife Corridor and Green Belt. The site is within the setting of the Forty Hill Conservation Area which is delineated by New River.
- 4.5 The natural ground level increases from the east to west. The river bund of New River is higher than the site. The ground level also increases from south to north with sloping grass verges along Bullsmoor Lane.
- 4.6 The site is mainly comprised of hardstanding with a small tree adjacent to the western site boundary and a hedge on the southern boundary. The existing vegetation is not protected by a Tree Protection Order.
- 4.7 The site is located in Environment Agency Flood Zone 1 (low risk of flooding).
- 4.8 The site has a Public Transport Accessibility Level (PTAL) of 1B. There are several bus stops within walking distance on Great Cambridge Road. The nearest train station (Turkey Street) is circa 1.1km (approximately 7-minute cycle or 17 minutes' walk) away.

- 4.9 The site is located within an emerging residential quarter established by the recent completion of the adjoining Bells Moor Gardens scheme, to the north. There is a local shopping parade with groceries, shops and restaurants within 400m of the site (approximately 5 minutes' walk) on the eastern section of Bullsmoor Lane. These services can be accessed via the underpass directly south of the site. There are a few schools nearby including Capel Manor Primary School, Orchardside School, Honilands Primary School and Lea Valley Academy within 10-min walking distance.
- 4.10 There is an existing walking path on the western bund of this section of New River. As shown in the Draft Infrastructure Delivery Plan (2021), the Council's Healthy Street Team plans to create a new continued walking and cycling path along the New River connecting Enfield Town and Broxbourne.

5. Proposal

- 5.1 This application seeks permission for the erection of a part 3, part 4, part 6 storey block of 29 x London Affordable Rent homes comprising 15 x 1 bed 2 person homes (52%), 5 x 2 bed 4 person homes (17%), and 9 x 3 bed 5+ person homes (31%). 10% of the new homes (3 homes) will be wheelchair accessible.
- 5.2 A total of 14 x car parking spaces including 3 x disabled parking spaces will be provided on the ground floor with a new pedestrian and vehicular access via Copse Close. The existing crossover directly off Bullsmoor Lane will be reinstated.
- 5.3 The proposed ground floor homes will have their separate entrances. All the private and communal entrances will be accessed via either the existing public grass verges on Bullsmoor Lane or the western side of Copse Close where a strip of existing soft landscaping will be paved.
- 5.4 A new graded refuse loading bay near the proposed communal refuse store on Bullsmoor Lane is proposed.
- 5.5 The proposed development features a multi-level landscape scheme including the front gardens of the new homes and rain garden on the ground floor, communal play space on the podium and ground-based green walls on majority of the western façade (up to 4 storeys).
- 5.6 Roof-mounted photovoltaics (PV) panels will be installed on the roofs of most of the proposed building.

6. Consultation Statutory and Non-Statutory Consultees

Internal Climate Action and Sustainability

- 6.1 The Energy Statement submitted is comprehensive and concise. Comments during pre-application have been addressed. The proposed development is an ambitious pilot using MMC technology and is expected to provide high level of energy efficiency and high-quality accommodation.

Economic Development

- 6.2 The Applicant and the contractor Zed Pods have engaged with the Economic Development Team. It is expected that the on-site installation will be between 40 –

46 weeks after off-site manufacturing of the components. The Economic Development Team has no objection subject to a Local Employment and Skill Strategy to be secured within the shadow S106 Agreement.

Education

- 6.3 No objection subject to a financial contribution of £73,515 toward education to be secured within the shadow S106 Agreement.

Heritage

- 6.4 No objection subject to a high-quality design of the building and landscaping along New River.

Environmental Health

- 6.5 No objection subject to conditions relating to noise, air quality and land contamination.

Highways Service

- 6.6 An application for heavy duty crossover should be submitted prior to commencement to enable the construction works.

Parks

- 6.7 There is no neighbouring park to the development. Officers have advised that Aylands Open Space accommodates existing play provision and consider that the play space financial contribution secured should be directed, in the first instance, towards expanding and improving this space. Officers recommend a s106 obligation to secure.

Sustainable Drainage

- 6.8 No objection in principle but additional information is required on the Sustainable Drainage Strategy. This would be secured by a condition.

Tree

- 6.9 No objection subject to a condition to secure detailed landscape plan.

Traffic and Transportation

- 6.10 No objection subject to conditions to secure a Construction Management Plan, and shadow S106 to secure financial contribution for sustainable travel package and highways works.

Urban Design

- 6.11 The Urban Design Team confirmed that the proposal meets the majority of policy requirements while responding to a difficult site location, geometry and significant constraints on budget due to the provision of 100% affordable housing. During Round 1 consultation, Urban Design Officers raised some concerns with the scheme - which notably included the size of private amenity spaces, landscaping on the podium and public realm, details and materiality. The Applicant has submitted revised plans and further clarifications. While some concerns remain, Urban Design Officers are satisfied that, on balance, the amendments have positively influenced the scheme, and the appearance of the buildings – and that a high-quality landscape scheme can be secured by conditions.

Waste Services

- 6.12 No response was received

External

Designing Out Crime Officer (Met Police)

6.13 No objection subject to a condition to attain the Security by Design certification

Enfield Place and Design Quality Panel (DRP)

6.14 During the pre-application stage, an independent Design Review Panel (DRP) was held on 9th December 2021. The comments are summarised below:

- Overall, the design quality of the scheme is undermined by the number and size of homes being provided on the site. This is placing excessive pressure on the massing, form and landscape and resulting in many issues. The Applicant is encouraged to review the mix and number of homes on the site and discover if it is possible to reduce the density on the site.
- The landscape proposals need further development and to include connections to the New River but also SuDS features – as opposed to attenuation tanks.
- Facing townhouses onto the new green being developed to the north is supported. However, this is contingent on the agreement of the housing association to allow the northern wall to be removed. Without this permission the layout of the townhouses should be reviewed.
- The Zed Pods system delivers an excellent level of building performance and meets high environmental performance standards. The approach to net zero carbon is welcome.
- The design team is encouraged to provide passive methods of cooling to avoid relying solely on Mechanical Ventilation with Heat Recovery (MVHR). This approach would make most use of the high level of dual aspect that is provided across scheme.
- The character, materiality and massing should be developed further. The design team should explore simplifying the material palette, simplifying the massing strategy and developing the roof form.
- Some homes on the ground floor have bedrooms and other primary living spaces fronting directly onto the street or adjacent to service areas resulting a low quality of accommodation. The design team is encouraged to review the boundary treatment and where homes front the street.

6.15 *Officer response: The Applicant has taken Design review panel comments into account, alongside Officer advice. Suggestions from the Panel have been incorporated, and where suggestions have not resulted in scheme changes, prior to submission, Officers have carefully assessed these details and sound justification is provided below. In respect of overall design approach, the pre-application process involved the Applicant considering design options to determine the most appropriate form of development, and the Applicant has followed a design-led approach in line with London Plan Policy D3. Different options have been explored to optimise site capacity – and deliver a 100% London Affordable Rent scheme within the constraints of a challenging site. As noted above, the site benefits from an unimplemented planning permission for part 3, part 4 storey block of 27 flats (ref: 17/05227/FUL) which was granted in 2019 – which was not subject to Design Review. Officers have assessed the scheme, including in comparison with the previously consented scheme, and are satisfied that the proposals would represent an improvement on the previously approved scheme.*

Energetik

6.16 The site is a long way from the planned District Heat Network. The use of air source heat pumps is supported.

6.17 *Historic England (Greater London Archaeological Advisory Service)*
No objection subject to condition to secure a Written Scheme of Investigation

6.18 *Hertsmere Borough Council*
No objection.

6.19 *London Fire Brigade*
No response was received.

6.20 *National Highway*
No objection as the operational and construction traffic trips generated by the proposed development would not have a material impact on the M25 Junction 25.

6.21 *Natural England*
No objection.

6.22 *Thames Water*
No objection subject to informatives.

6.23 *Transport for London*
No objection subject to carefully consideration to HGV routing to site, a booking system, and use of Silver or Gold members of Fleet Operators Recognition Scheme (FORS) to be secured via a condition for a Logistics and Construction Management Plan.

6.24 Public
Pre-Application
The Applicant undertook community consultation during pre-application stage, including distributing a newsletter to residents within a 150m radius of the Application Site and holding an online community meeting on 16th March 2021. A Statement of Community Involvement has also been submitted with the Application.

6.25 *Planning Application*
Consultation letters were sent to 260 surrounding properties on 9th May 2022

6.26 Site notices were put up on 16th May 2022

6.27 16 x objections to this application were received during the public consultation. A summary of the comments received and officers' responses are as follows:

Summary of responses

- Lack of consultation

Officers' response

The scheme has been revised several times, and has been informed by the concerns raised during public consultation.

Summary of responses

- Lack of shops on the western side of the A10
- The site should be used as green space
- Too many units
- Visual impacts
- Loss of scenery to Capel Manor Gardens
- Incoherent external materials

Officers' response

The matters raised are assessed in the 'Principle of Development', 'Housing Need and Mix' and 'Character and Design' sections of this report.

Summary of responses

- The external appearance, scale, massing and lack of design response to the locality are harmful to the Forty Hill Conservation Area when viewed in conjunction with the recently completed Bells Moor Gardens development.
- The three "Important Local Views" as identified in Report on Location of Tall Buildings and Important Local Views in Enfield", Enfield Council) including views (6) Whitewebbs, (8) Clay Hill and (13) Forty Hill would be distracted.
- The viewpoints from Forty Hill as shown on the Zone of Theoretical Visibility do not objectively show the impacts.

Officers' response

The matters raised are assessed in the 'Heritage' section of this report. Heritage Officers have raised no objection subject to a high quality design of the building and landscaping along New River.

Summary of responses

- Loss of privacy
- Loss of light
- Increase in noise
- Overshadowing to the front gardens of the adjoining houses in Bells Moor Garden

Officers' response

The matters raised are assessed in the 'Neighbouring Residential Amenities' section of this report.

Summary of responses

- Loss of greenspace
- Impact on the local wildlife, Lea Valley SPA and Epping Forest SAC

Officers' response

The matters raised are assessed in the 'Biodiversity, Trees and Landscaping' section of this report.

Summary of responses

- Location and number of parking spaces are unclear
- Unauthorised use of the existing car parking spaces within Bells Moor Gardens by non-residents.
- Insufficient parking provision. On-site parking spaces on the eastern side of the A10 should not be taken into account.
- Exacerbate the existing traffic congestion on Copse Close and Bullsmoor Lane particularly in the morning, during school pick-up / drop time times, and holidays with additional traffic to public attractions nearby.

Officers' response

The matters raised are assessed in the 'Traffic, Access and Parking' section of this report.

Summary of responses

- No commitment to BREEAM rating

Officers' response

BREEAM ratings are applicable in respect of non-residential schemes. The proposed development does not involve new commercial uses. BREEAM rating is not applicable in this instance.

Summary of responses

- Decrease in property values in Bells Moor Gardens

Officers' response

Impact on the property values is not a material planning consideration.

7. Relevant Planning History

Application site

- 7.1 TP/95/0112 Erection of detached 6-bedroom house with integral double garage involving the demolition of existing house. **Granted** 11/04/1995
- 7.2 17/05227/FUL Redevelopment of site and erection of part 3, part 4 storey block of 27 self-contained flats comprising 5 x 1 bed, 14 x 2 bed and 8 x 3 bed with associated parking and landscaping. **Granted with conditions and S106** 13/08/2019

Surrounding Site – Bells Moor Gardens

- 7.3 17/05528/FUL Redevelopment of the site to provide 56 new residential units including 5 x 4-bed town house (with integral garage), 7 x 2-bed houses, 2 x 3-bed houses and two blocks providing 21 x 1-bed, 10 x 2-bed and 11 x 3-bed self4 contained flats. Provision for cycle and bin stores, new access roads, car parking spaces and associated amenity spaces and landscaping **Granted with conditions and S106** 21/10/2019
- 7.4 19/04158/VAR Variation of condition number 02 of reference 17/05528/FUL to relocate and create refuse storage. **Granted with conditions and Deed of Variation** 30/06/2021

8. Relevant Planning Policies

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

National Planning Policy Framework 2021

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

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

8.3 The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

8.4 In relation to achieving appropriate densities Paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

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

Housing Delivery Test / Presumption in Favour of Sustainable Development:

8.6 The NPPF sets out at Paragraph 11 a presumption in favour of sustainable development. For decision taking this means:

"(c) approving development proposals that accord with an up-to date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:

- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (7); or
- (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

8.7 Footnote (8) referenced here advises "*This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.*"

8.8 In summary, the presumption in favour of sustainable development applies in two situations – where a Council is unable to demonstrate a five-year housing land supply, and when a Council fails to achieve 75 per cent or more in the Housing Delivery Test.

8.9 Enfield Council currently fails against both criteria – and is therefore subject to the most severe government sanctions which impact the Council's consideration of housing-led planning applications.

a) **5-year housing land supply:** Members will be aware of the need to be aware of the Council's housing land supply – and how it impacts on decision making. When there is not an up to date Local Plan and 5-year housing land supply cannot be demonstrated then this has a significant impact on the weight given to material planning considerations. The NPPF presumption, or 'tilted balance', applies in Enfield due to the Council's inability to demonstrate the required five-year housing land supply. The Council is unable to demonstrate a 5-year supply of deliverable housing sites and this impacts on the status of its Local Plan policies.

b) **Housing delivery test:** The NPPF presumption, or 'tilted balance', also applies in Enfield because Enfield is one of 51 Councils which have achieved below 75 per cent against the Housing Delivery Tests – it is therefore also subject to the Housing Delivery Tests most severe government sanction, the NPPF's presumption in favour of sustainable development.

8.10 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the Government through the 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.

8.11 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".

- 8.12 The Council's recent housing delivery has been below our housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and being placed in the "presumption in favour of sustainable development category" by the Government through its Housing Delivery Test. This status has recently been confirmed for the period 2022-23.
- 8.13 In 2020 Enfield delivered 56% of the 2,328 homes target and was as a result placed into the "presumption in favour of sustainable development" category. In January 2021 Enfield delivered 67% of its homes target. The Council therefore remains in the "presumption in favour of sustainable development".
- 8.14 This is referred to as the "tilted balance" and the NPPF states (see paragraph 8.6 above) that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan.
- 8.15 Under the NPPF paragraph 11(d) where the most important development plan policies for the application are deemed to be 'out of date', planning permission should be granted. That does not mean out of date policy can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be given weight by the Planning Committee when undertaking their assessment taking account of the "tilted" balance that applies. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

The London Plan 2021

- 8.16 The London Plan together with Enfield's Local plan forms the Development Plan for this application. It is the overall strategic plan for London setting out an integrated economic, environmental, transport and social Framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:

- GG1 – Building Strong and Inclusive Communities
- GG2 – Making the Best Use of Land
- GG3 – Creating a Healthy City
- GG4 – Delivering the Homes Londoners Need
- D3 – Optimising Site Capacity through the Design-Led Approach
- D4 – Delivering Good Design
- D5 – Inclusive Design
- D6 – Housing Quality and Standards
- D7 – Accessible Housing
- D11 – Safety, Security and Resilience to Emergency
- D12 – Fire Safety
- D14 – Noise
- H4 – Delivering Affordable Housing
- H5 – Threshold Approach to Applications
- H6 – Affordable Housing Tenure

- H10 – Housing Size Mix
- G5 – Urban Greening
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- S4 – Play and Informal Recreation
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions
- SI3 – Energy Infrastructure
- SI4 – Managing Heat Risk
- SI5 – Water Infrastructure
- SI12 – Flood Risk Management
- SI13 – Sustainable Drainage
- SI17 – Reducing Waste and Supporting the Circular Economy
- 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

Local Plan - Overview

- 8.17 Enfield's Local Plan comprises the Core Strategy, Development Management Document, Policies Map and various Area Action Plans as well as other supporting policy documents. Together with the London Plan, they form the statutory development plan for the Borough. Enfield's Local Plan sets out planning policies to steer development where they align with the NPPF and the London Plan 2021. Whilst many of the policies do align with the NPPF and the London Plan, it is noted that these documents do in places supersede the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan.

Enfield Core Strategy: 2010

- 8.18 The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the Borough is sustainable.

- CP2: Housing supply and locations for new homes
- CP3: Affordable housing
- CP4: Housing quality
- CP5: Housing types
- CP9: Supporting community cohesion
- CP20: Sustainable energy use and energy infrastructure
- CP21: Delivering sustainable water supply, drainage and sewerage infrastructure
- CP22: Delivering sustainable waste management
- CP24: The road network
- CP25: Pedestrians and cyclists
- CP26: Public transport
- CP28: Managing flood risk through development

- CP30: Maintaining and improving the quality of the built and open environment
- CP31: Built and landscape heritage
- CP32: Pollution
- CP36: Biodiversity
- CP46: Infrastructure contributions

Development Management Document (2014)

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

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

- DMD1 Affordable Housing on sites capable of providing 10 units or more
- DMD3 Providing a Mix of Different Sized Homes
- DMD6 Residential Character
- DMD8 General Standards for New Residential Development
- DMD9 Amenity Space
- DMD10 Distancing
- DMD37 Achieving High Quality Design-Led Development
- DMD38 Design Process
- DMD45 Parking Standards
- DMD47 New Roads, Access and Servicing
- DMD48 Transport Assessments
- DMD49 Sustainable Design and Construction Statements
- DMD50 Environmental Assessment Methods
- DMD51 Energy Efficiency Standards
- DMD53 Low and Zero Carbon Technology
- DMD55 Use of Roof Space / Vertical Surfaces
- DMD56 Heating and Cooling
- DMD57 Responsible Sourcing of Materials
- DMD58 Water Efficiency
- DMD59 Avoiding and Reducing Flood Risk
- DMD60 Assessing Flood Risk
- DMD61 Managing Surface Water
- DMD65 Air Quality
- DMD66 Land contamination and instability
- DMD68 Noise
- DMD69 Light Pollution
- DMD70 Water Quality
- DMD72 Open Space Provision
- DMD73 Children's Play Space
- DMD76 Wildlife Corridor
- DMD78 Nature Conservation
- DMD79 Ecological Enhancements
- DMD80 Trees on Development Sites
- DMD81 Landscaping

8.21 Other Material Considerations
 National Planning Practice Guidance
 Mayor of London Housing SPG (Adopted March 2016)
 LBE S106 SPD 2016

Enfield Local Housing Needs Assessment 2020
 Community Infrastructure Levy Regulations 2010 (as amended)
 Technical housing standards – nationally described space standard 2015
 Enfield Blue and Green Strategy June 2021
 Enfield Waste and Recycling Storage Planning Guidance (2010),
 TfL London Cycle Design Standards (2014)
 Energy Guidance LPG 2021
 Be Seen Energy Monitoring LPG 2021
 Play and Informal Recreation SPG 2016
 Draft Housing Design Standards LPG 2022
 Draft Fire Safety LPG 2022
 Draft Urban Greening Factor LPG 2021
 Draft Air quality positive LPG 2021
 Enfield Local Heritage List (May 2018)
 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)
 The Environment Act 2021
 The Planning (Listed Buildings and Conservation Areas) Act 1990 – sets out the tests
 for dealing with heritage assets in planning decisions. In relation to listed buildings, all
 planning decisions should “*have special regard to the desirability of preserving the
 building or its setting or any features of special architectural or historic interest which
 it possesses*” (Section 66). In relation to conservation areas, special attention must
 be paid to “*the desirability of preserving or enhancing the character or appearance of
 that area*” (Section 72).

Enfield Local Plan (Reg 18) 2021

- 8.22 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.
- 8.23 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.
- 8.24 Key local emerging policies from the plan are listed below:
 Policy DM SE2 – Sustainable design and construction
 Policy DM SE4 – Reducing energy demand
 Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
 Policy DM SE7 – Climate change adaptation and managing heat risk
 Policy DM SE8 – Managing flood risk
 Policy DM SE10 – Sustainable drainage systems
 Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
 Policy DM BG8 – Urban greening and biophilic principles
 Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
 Policy DM DE2 – Design process and design review panel
 Policy DM DE6 – Tall buildings
 Policy DM DE7 – Creating liveable, inclusive and quality public realm
 Policy DM DE10 Conserving and enhancing heritage assets
 Policy DM DE11 – Landscape design
 Policy DM DE13 – Housing standards and design
 Policy DM H2 – Affordable housing

Policy DM H3 – Housing mix and type
 Policy DM T2 – Making active travel the natural choice
 Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

Relevant planning appeals and case law

2021 Enfield Council Appeal Allowed

8.25 **Ref: APP/Q5300/W/20/3263151: 79 Windmill Hill, Enfield EN2 7AF:** This appeal was allowed on 02 November 2021 for 49 x self-contained flats within 3 Blocks. The position in respect of affordable housing and housing mix are relevant to the consideration of this application.

- Paragraphs 19 and 20 of the appeal decision sets out that the Council's Core Strategy mix targets should not be applied mechanistically to every scheme on every site – but rather applied over the lifetime of the CS across the entire borough. Enfield's Core Strategy and Development Management Document mix policies have less weight than Policy H10 of the London Plan (2021) – which stresses the importance of locational factors when considering mix and the benefits of 1 and 2 bed dwellings in taking pressure off conversions of larger family homes to smaller dwellings.
- Paragraphs 15 to 17 consider the Council's 40% Affordable Housing requirement set out at policy Enfield's Development Management Document Policy DMD1 in the context of London Plan Policy, including H4 and conclude that the amount of affordable housing should correctly be tested by viability where there is evidence of viability issues affecting a development.

2021 Enfield Council Appeal Allowed

8.26 **Appeal Ref: APP/Q5300/W/21/3270885: Southgate Office Village, 286 Chase Road, Southgate N14 6HT:** This appeal was allowed on 14 December 2021 for the erection of a mixed-use (C3) scheme ranging from 2 to 17 storeys with a dual use café (B1/A3), with associated access, basement car and cycle parking, landscaping, and ancillary works

- Paragraph 54 notes *“The evidence shows that at present, they {the Council} can demonstrate a supply {Housing} of just over two years...that would make LP Policy D9 (amongst others) out-of-date”*
- Paragraph 55 provides the following commentary on paragraph 11d)ii of the NPPF commenting *“This sets out that in the situation under consideration, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. The only harmful aspect of the scheme is that its timing relative to the emerging Local Plan means that the Council, residents, and others with an interest, would lose the opportunity to consider the suitability of the site for a tall building, or buildings, through the examination process, whenever it might take place. To my mind, bearing in mind the parlous state of the Council's housing land supply, the harm that flows from that pales against the enormous benefits of the open-market and affordable housing the scheme would bring forward in a well-designed, contextually appropriate scheme.*
- Paragraph 56 goes on to state *“It seems to me therefore that whichever way one approaches the matter, the answer is the same; planning*

permission should be granted for the proposal”.

2022 Enfield Council Appeal Allowed

8.27 **Appeal ref: APP/Q5300/W/21/3276466: Car Park Adjacent to Arnos Grove Station, Bowes Road:** This appeal was allowed on 30 March 2022 for the construction of four buildings, comprising 162 x residential units (64 x affordable homes) and flexible use ground floor unit.

- Paragraph 81 considers the Council’s failure to deliver against its Housing Target concluding that: *‘the appeal scheme would make a significant contribution to the delivery of housing in general and affordable housing in particular. Viewed in the context of recent levels of housing delivery in Enfield, significant benefit should be attached to the benefit of the scheme’s housing delivery’.*

9. Analysis

- 9.1. The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise. Furthermore, paragraph 11 (c) of the NPPF goes on to state that development proposals that accord with the development plan should be approved without delay.
- 9.2. As explained at Section 8, the Council is subject to the so called “tilted balance” and the NPPF states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 9.3. This report sets out the analysis of the issues that arise from the proposal when assessed against the development plan and the NPPF
- 9.4. This application has been subject to extensive negotiation to address the concerns raised by officers and local residents through the consultation process.
- 9.5. The main considerations of the development are the following:
 - Principle of Development
 - Housing Need and Mix
 - Character and Design
 - Neighbouring Residential Amenities
 - Quality of Accommodation
 - Biodiversity, Trees and Landscaping
 - Traffic, Access and Parking
 - Flood Risk and Drainage
 - Carbon Emissions and Sustainability

- Fire Safety
- Air Pollution and Land Contamination
- Secure by Design
- Heritage

Principle of Development

Optimising brownfield site for residential development

- 9.6. The principle of increased residential density and development at the Application Site has been established through the previously consented scheme (ref: 17/05227/FUL). The principle of optimising site capacity is strongly supported by adopted Development Plan Policies, alongside the NPPF Paragraph 11 implications of the Council's under-delivery against its housing delivery target and housing land supply positions. Making more efficient use of land is presently of significance due to the identified need for housing as a consequence of the Housing Delivery Test, which has triggered the "tilted balance" and the presumption in favour of approving sustainable development (NPPF). For decision-taking, this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan.
- 9.7. Enfield Housing's Trajectory Report (2019) shows that during the preceding 7 years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more high-quality homes is a clear priority, with only 51% of approvals over the preceding 3-years actually being implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 9.8. The Council's Local Plan Issues & Options (Regulation 18) document (2021) acknowledges the sheer scale of the growth challenge for the Council and the focus for development in locations with good access to local infrastructure and public transport. The Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the Borough.
- 9.9. Enfield is a celebrated green borough with close to 40% of the land currently designated as Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. These land designations underpin the need to optimise development on brownfield land. Paragraph 1.2.5 of the London Plan (2021) notes that: *'all options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London'*.

- 9.10. The application site is a brownfield site within a predominately residential area comprising hardstanding with an element of amenity grassland. The principle of residential-led redevelopment has already been established in the unimplemented permission (ref: 17/05227/FUL).

Green Belt

- 9.11. The application site adjoins the New River which is on the edge of the Green Belt. The proposed development would not detrimentally increase visual dominance or intrusiveness of the built form on the Green Belt given the existing residential backdrop of the recently completed Bells Moor Gardens and with the New River, a clear distinction between the Green Belt and urban area would remain. The new planting and substantial green wall on the western elevation will also be provided (see also the 'Biodiversity Trees and Landscaping' section). The taller 6 storey element has been carefully designed to be sited away from the New River. As a result, it is considered the openness of the Green Belt would be maintained.
- 9.12. Policy DMD 83 of the Development Management Document seeks to assess development proposals against their impact on the Green Belt. The NPPF and London Plan) do not contain policies that directly affect development sites adjacent to the Green Belt. The proposed development would have a greater impact than the unimplemented permission in respect of the views and vistas. Planning officers have given due weight to the greater massing from the proposed development. Nonetheless, overarching policy supports the development of such sites and the presence of Bells Moor Gardens which has a similar relationship with the Green Belt boundary is considered to be a material consideration.

Conclusion on Principle of Development

- 9.13. The proposed development would optimise a brownfield site comprising mainly hardstanding in a predominately residential street to deliver 29 x London Affordable Rent homes. The residential-led redevelopment of the site has already been established by the unimplemented permission (ref: 17/05227/FUL) It would not have any adverse impact on the openness of the adjoining green belt. In principle, this is supported by the NPPF , London Plan Policies and Core Strategy (2010).

Housing Need and Mix

- 9.14. The current London Plan sets a target for the provision of 52,287 new homes each year. In addition, the London Plan identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the current target of 798. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable, high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.
- 9.15. Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver ambitious adopted London Plan targets.
- 9.16. Core Policy 5 outlines that the Council will seek a range of housing types in the intermediate sector and that the mix of intermediate housing sizes will be determined on a site by site basis. It should also be noted that the evidence base to support Core Policy 5 dates from 2008. The Local Housing Needs Assessment 2020, which

informs the emerging draft Local Plan for Enfield, is a more up to date evidence base. Hence, it carries weight in the assessment.

- 9.17. The Local Housing Needs Assessment (LNHA) 2020 identifies that among those on the Council's housing register waiting list, 14.7% need one-bedroom, 35.3% need two bedroom, 42.3% need three-bedrooms, and 7.7% need four or more bedrooms.
- 9.18. The LNHA (2020) has informed emerging Policy H3 of the Draft Local Plan for Enfield (2021). The table below is an extract from Policy H3, which outlines priority types for different-sized units across different tenure. The focus of affordable ownership provision (social/affordable rented) should be on two-bedrooms and 3 bedrooms units. It is noted that the Draft Reg 18 Local Plan was published in June 2021 and is at an early stage of preparation. Although this draft policy in the emerging plan carries limited weight now, it is used to illustrate the most up-to-date housing need in Enfield.

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

Source: Table 8.4: Dwelling size priorities, Enfield Local Plan (Reg 18) 2021

- 9.19. As shown from Table 1, compared with the unimplemented permission (ref: 17/05227/FUL), this application would substantially increase the delivery of affordable homes by 18 units to 29 units including a significant uplift of London Affordable Rent homes from 7 units to 29 units.

Table 1 Dwelling size and tenure mix of the previous permission (ref: 17/05227/FUL) and this Application

		Unimplemented permission (ref: 17/05227/FUL)	This application
London Affordable Rent	1 bed	1	15
	2 bed	4	5
	3 bed	2	9
Shared Ownership	1 Bed	1	N/A
	2 Bed	2	N/A
	3 Bed	1	N/A
Subtotal- Affordable		11	29
Market sale	1 bed	2	N/A
	2 bed	6	N/A
	3 bed	8	N/A
Subtotal - Market sale		16	N/A

- 9.20. With regards to the proposed housing mix, the proposal would deliver a wide range of Affordable Rent homes including 1 x bed (52%), 2 x bed (17%) and 3 x bed (31%) units. These unit sizes are identified as either 'Medium priority' or 'High priority' for Affordable Rent tenure across the Borough in the latest LNHA (2020). Turning into the local area, the LNHA (2020) estimates that in the Turkey Street ward (before the Whitewebbs Ward was introduced), 62.7% of all the properties, houses or flats had 3 or more bedrooms. The proposed housing mix will contribute to a range of affordable

housing in the local area and the Borough. Officers consider the proposed mix can be supported, both due to the reasonable justification provided by the Applicant for such mix, and when considering the weight of Enfield's housing policies against the more recently adopted London Plan housing mix policy – particularly bearing in mind the implications of Paragraph 11 of the NPPF. As set out above the Council's housing policies are considered to be out-of-date.

- 9.21. During pre-application, the scheme was revised to increase the number of 3 bed+ units. It is considered that the provision has been maximised while balancing the viability implications of the a 100% London Affordable Rent scheme with challenging site constraints. LBE Housing has confirmed that 50% of the pipeline on other schemes are family homes. For example:
- Newstead House in Edmonton Green (ref: 16/04184/RE4) delivered 12 homes consisting of 11 x 3bed and 1x2bed;
 - In Meridian Water 1, 242 homes were acquired, 50% of which were 3b5p and 4b6p units;
 - Bury Street West redevelopment in Bushill Park (ref: 17/00344/RE4) will deliver 50 new homes of which more than 50% will 3 & 4 bed home;
 - Upton & Raynham estate regeneration in Upper Edmonton (ref: 21/04271/RE4) will deliver 134 homes of which 40% will be 3bed + homes;
 - Exeter Road estate regeneration (ref: 21/02076/OUT) will deliver 129 homes of which 40% will be 3bed + homes
- 9.22. 10% of the units will be M4(3) wheelchair accessible homes. Improvements have also been made during the course of the planning process, including at least 1.2m wide access in all the communal areas, level access on podium, and canopies to all the entrances of the wheelchair accessible units and communal stair cores. Final details of the proposed levels will be secured by condition to ensure the ramped access on ground floor will be fully accessible to all users.

Conclusion on housing need and mix

- 9.23. The proposed development would deliver 29 x London Affordable Rent homes including 9 bed+ units and 3 wheelchair accessible units, representing a significant uplift of London Affordable Rent homes from 7 x units in the unimplemented planning permission (ref: 17/05227/FUL). The proposed housing typology and mix is therefore considered acceptable. These considerations weigh heavily in favour of the development in the planning balance.

Character and Design

- 9.24. Paragraph 126 of the NPPF underscores the central value of good design to sustainable development. The Framework expects the planning process to facilitate “high quality, beautiful and sustainable buildings and places”. As in Paragraph 130, the assessment of a scheme should take into account the endurance of the design, visual appeal, sensitivity to local context, sense of place, optimisation of the site and contribution to health and wellbeing.
- 9.25. London Plan Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged.

- 9.26. Enfield Policy DMD 37 sets out objectives for achieving good urban design: character; continuity and enclosure; quality of public realm; ease of movement; legibility; adaptability and durability; and diversity.

Layout, Height and Massing

- 9.27. The immediate surrounding area is characterised predominantly by two storey residential developments to the east and south on the opposite side of the Great Cambridge Road (A10) and Bullsmoor Lane respectively. The two roads are busy and the A10 is a main trunk road. The site is also bordered by the New River to the west. Given the distance and nature of the A10 and Bullsmoor Road, and the New River, this site together with the adjoining recently completed Bells Moor Gardens form a distinct area with opportunity to optimise site capacity and bring forward a larger scale of development.
- 9.28. Officers consider the overall layout responds well to the site constraints. The Applicant has worked proactively with the Local Planning Authority (LPA) to optimise site capacity, while accommodating parking and communal amenity space at podium level – which would be protected from the noise and pollution of the A10. The proposal maximises active frontage to the street and overlooking of the existing open space to the north. The overall layout is supported and defines public and private spaces well.
- 9.29. Whilst this layout has resulted in homes within the northeast portion of the site having a limited separation distance between them, this issue is mitigated by the internal layout of these homes, with the careful design of window locations and orientations – maximising the effective distance between habitable room windows. Also, homes on the northern wing of the development contain fewer private rooms such as bedrooms on the affected facade.
- 9.30. The two existing 4-storey apartment blocks in the adjoining Bells Moor Gardens establish a taller height datum within the immediate vicinity of the site. Officers consider that the increased height proposed on the Application Site – of up to 6 storeys is an appropriate response at this corner location. The Application Site is located adjacent to a wide road, junction and expansive open space. Officers therefore consider that some increase in height is acceptable in order to respond to the dimensions of the space around it and offer a presence, enclosure and surveillance of the street without causing any harm to long and mid-range views from the surrounding heritage assets (See the Heritage section below).
- 9.31. The mass of the proposed building, while bulkier than the existing houses to the south and east, would sit well especially within the context of the adjoining Bells Moor Gardens residential development to the north. The taller 6 storey element of the proposed building has also been carefully designed to be located away from the New River with a central podium to offer a greater buffer than the previous permission (ref: 17/05227/FUL) where the three storey blocks abutted and ran along the New River.
- 9.32. Furthermore, the Applicant has responded to Urban Design Officer comments to break down the mass of the proposal into a number of distinct forms, with taller elements being distinguished by mono-pitches, as opposed to the dual pitch of the lower wings.
- 9.33. The proposal successfully responds to the open space on all sides of the site, providing sufficient enclosure, presence and overlooking, while providing open and

acoustically protected communal gardens to the rear. The massing, in association with the layout, is therefore considered acceptable.



Figure 1: CGI of the proposed development

Detailing and materials

- 9.34. Officers have explored the option of facing brick. However, the Applicant has confirmed that this would be challenging when considering the constraints and characteristics of using a pre-fabricated product, alongside the viability implications of delivering a 100% London Affordable rented scheme.
- 9.35. During the planning process, the Applicant and product supplier have worked closely with the LPA to make amendments where possible. The proposed cladding materials has been improved though the use of brick slips for the plinth and the stair core with fibre reinforced concrete weatherboarding on the upper floors. There are instances of weather boarding throughout the Borough. The Urban Design Team has confirmed that the proposed approach could be successful in this location, where there is no strong prevailing character, subject to detailed selection of the product, colour and interface with other materials, roof and window reveals. The Applicant has confirmed that despite the method of construction, the contractor will still go through the detailed design stage. A condition has been attached to secure the details of the materials.
- 9.36. Throughout the planning process, the Applicant has also improved the appearance of the building by some positive design changes to the fenestration such as deeper window reveals in south and east elevations, new windows on the northern wing to face the New River and use of window surround detailing.

Conclusion on Character and Design

- 9.37. The proposed courtyard typology with entrances to the communal core and ground floor units would help activate Bullsmoor Lane while providing safer, more calming communal amenity space on the podium and introducing passive surveillance to the existing New River Path on the western river bund. The proposed development reflects the challenging constraints of the site, with proportions, bulk and mass that integrate well with the adjoining Bells Moor Gardens and seek to minimise impacts to

neighbouring properties and setting of the heritage assets while creating a functional and welcoming living environment and delivering enough quantum of genuinely affordable homes.

- 9.38. Although the proposed cladding materials would be different from existing buildings in the locale, it is not considered that such a departure is unwelcome due to the varied architectural character in the area and the strong design and a clear design solution which aims to provide cost effective, low-carbon affordable dwellings. The material samples and detailed drawings of the buildings and boundary treatments can be adequately secured by conditions to ensure a satisfactory appearance and appropriate integration into the street scene and the New River.
- 9.39. On balance, the proposed development is consistent with the provisions of Policy CP30 of the Core Strategy, Policies DMD6, 8 and DMD37 of the Development Management Document, Policies D3 and D4 of the London Plan (2021) and the NPPF (2021).

Heritage and archaeological

- 9.40. Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty on planning authorities to safeguard the special interest of listed buildings and their settings. Section 72 of the Act imposes a statutory duty on planning authorities to preserve or enhance the character and appearance of conservation areas. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *“have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*. In relation to conservation areas, special attention must be paid to *“the desirability of preserving or enhancing the character or appearance of that area”*.
- 9.41. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be (para 199). Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting (para 200). Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting (Annex 2). There should be ‘clear and convincing’ justification for any harm to, or loss of, a designated heritage asset (para 200). Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (para 202).
- 9.42. London Plan Policy HC1 requires development proposals which affect the setting of heritage assets (designated and non-designated) to be sympathetic to their significance and appreciate their surroundings. Harm should be avoided, and enhancement opportunities taken where they arise. ECP31 of the Local Plan requires that special regard be had to the impacts of development on heritage assets and their settings, Policy DMD 44 advises applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused whilst Policy DMD 37 requires that development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.

9.43. The first step is for the decision-maker to consider each of the designated heritage assets (referred to hereafter simply as “heritage assets”) which would be affected by the proposed development (the applicant should describe the significance of the heritage assets affected) in turn and assess whether the proposed development would result in any harm to the heritage asset. The decision of the Court of Appeal in *Barnwell Manor* confirms that the assessment of the degree of harm to the heritage asset is a matter for the planning judgement of the decision-maker. However, where the decision-maker concludes that there would be some harm to the heritage asset, in deciding whether that harm would be outweighed by the advantages of the proposed development (in the course of undertaking the analysis required by s.70 (2) of the Town and Country Planning Act 1990 and s.38 (6) of the Planning and Compulsory Purchase Act 2004, the decisionmaker is not free to give the harm such weight as the decision-maker thinks appropriate. Rather, *Barnwell Manor* establishes that a finding of harm to a heritage asset is a consideration to which the decision-maker must give considerable importance and weight in carrying out the balancing exercise. There is therefore a “strong presumption” against granting planning permission for development which would harm a heritage asset. In the *Forge Field* case the High Court explained that the presumption is a statutory one. It is not irrefutable. It can be outweighed by material considerations powerful enough to do so. But a local planning authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering. The case-law also establishes that even where the harm identified is ‘less than substantial’ (NPPF para 199), that harm must still be given considerable importance and weight. Where more than one heritage asset would be harmed by the proposed development, the decision-maker also needs to ensure that when the balancing exercise is undertaken, the cumulative effect of those several harms to individual assets is properly considered. Considerable importance and weight must be attached to each of the harms identified and to their cumulative effect. It is important to note that the identification of ‘less than substantial harm’ does not equate to a ‘less than substantial’ objection¹. The decision-maker must apply a weighted or tilted balancing exercise, giving the assessed degree of harm (or enhancement) to the heritage asset ‘considerable importance and weight’ as against other considerations². What follows is an officer assessment of the extent of harm which would result from the proposed development.

9.44. The NPPF is further amplified in a series of five steps in *Historic England GPA 3: The Setting of Historic Assets (2017)* setting out the stages of assessment and how opportunities for enhancement should be identified.

Analysis

9.45. There are no designated or non-designated heritage assets within the Application Site boundary.

9.46. The Application Site is immediately adjacent to the Forty Hill Conservation Area and New River. Further to the west are several Grade II* and II Listed Buildings associated with Capel House. The site is located within the Whitewebbs Hill, Bulls Cross and Forty Hill Archaeological Priority Area.

¹ *Barnwell vs. East Northamptonshire DC* 2014 (para.29)

² *Kinsey vs. London Borough of Lewisham* 2021 (para.84)

Built Heritage

- 9.47. Representations received have objected that the proposed development would be visible from three 'Important Local Views' as identified on the Location of Tall Buildings and Important Local Views in Enfield (2013) including from Viewpoint (6) Whitewebbs, (8) Clay Hill and (13) Forty Hill, and also raised concerns in respect of the impact on the Grade I Listed Forty Hall.
- 9.48. Officers have taken care to consider the impacts of the proposal on the designated and non-designated heritage assets and their settings. There has been consideration of views both into, and out of the conservation area and the setting of other assets.
- 9.49. NPPF paragraph 194 requires that in the determining of applications that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be appropriate to the asset's significance.
- 9.50. A Heritage Statement was prepared by the Museum of London Archaeology (MOLA) and submitted in support of the planning application. The report assesses designated and non-designated built heritage assets that may be affected by the development, including the contribution of their settings to their significance, and concludes with an assessment of impact of the proposed development on the significance of relevant built heritage assets.
- 9.51. In respect of the Forty Hill Conservation Area, the submitted Heritage Statement considers that the site is adequately screened off from the Conservation Area boundary by existing trees and metal fencing thus reducing any visual impact. It also considers the benefits of high-quality design, including appropriate materials – and weighs the public benefits of the proposed affordable housing. The Heritage Statement sets out that due to the enclosed nature of the Forty Hill Conservation Area – Capel Manor sub-area, the proposal would have a less than substantial impact on the character of the area. It considers the Application Site's location relative to the Conservation Area, noting that that the site is located on the western fringe of a densely built-up area, suburban in character and intersected by Great Cambridge Road (A10) a major thoroughfare. Within this context, a new residential development is considered to represent the natural continuation of the residential character of this suburban area.
- 9.52. The Conservation Team has also confirmed that the viewpoints within Forty Hall are located in areas which the ZTV show the scheme may be visible. The visualisations show that the scheme would be of very limited visibility in these areas. Whilst the development may be visible from the upper floors, the site does not align with the axis of the listed building and it is unlikely to impact setting in a way which would impact upon the significance of the listed building. Overall it is considered that due to the distance and intervening vegetation the proposed scheme is unlikely to have an impact upon the significance of Capel House and associated heritage assets. This has been demonstrated through the Zone of Theoretical Visibility and Verified Views.
- 9.53. The New River is an important feature in the Forty Hill Conservation Area and is a Non-Designated Heritage Asset. In respect of the New River, Officers have considered this in the context of the New River's importance as a feature in the landscape – and its value in providing a peaceful and secluded environment – especially in the context of the busy suburban environment of the Application Site.

The Applicant's Heritage Statement highlights that the waterway is an essential part of the landscape and should be respected. The Conservation Team confirmed that given the sites position at a curve in the New River, development on this site offers a placemaking opportunity to create visual interest and punctuate a moment as part of a wider kinetic experience. The Conservation Officer has advised that weight should be given to the architectural quality of the scheme. Officers agree – and have worked to ensure that the proposal incorporates a substantial green wall enclosing the western façade of the proposed building facing the New River. Officers consider that the expansive green wall represents an improvement when compared to the unimplemented permission and would provide a visual enhancement along this section of the New River.

- 9.54. An analysis of five views has been undertaken: one from Forty Hall Estate, one from Myddelton House and three from Capel Manor. Of the key views assessed in the Heritage Statement, the applicant's views analysis indicates that, due to the distance from these heritage assets and the intervening built and landscape form, the proposed development will not be visible during either the winter or summer months from either Forty Hall Estate or Myddelton House. Views from within Capel Manor sub-area suggest the Application Site will have some visible during the winter months, but its visual impact will be greatly decreased by the presence of trees, marking the perimeter of the CA. Officers have also considered the benefit of the proposed green wall, as a visually recessive background element – behind the perimeter of trees. During the summer months tree foliage is considered to provide suitable screening. Officers broadly agree with the view analysis within the Heritage Statement and have worked to improve on the position set out in the Heritage Statement, including by encouraging and negotiating enhancements, including the western façade green wall.

Important Local Views: Longer Distance Views

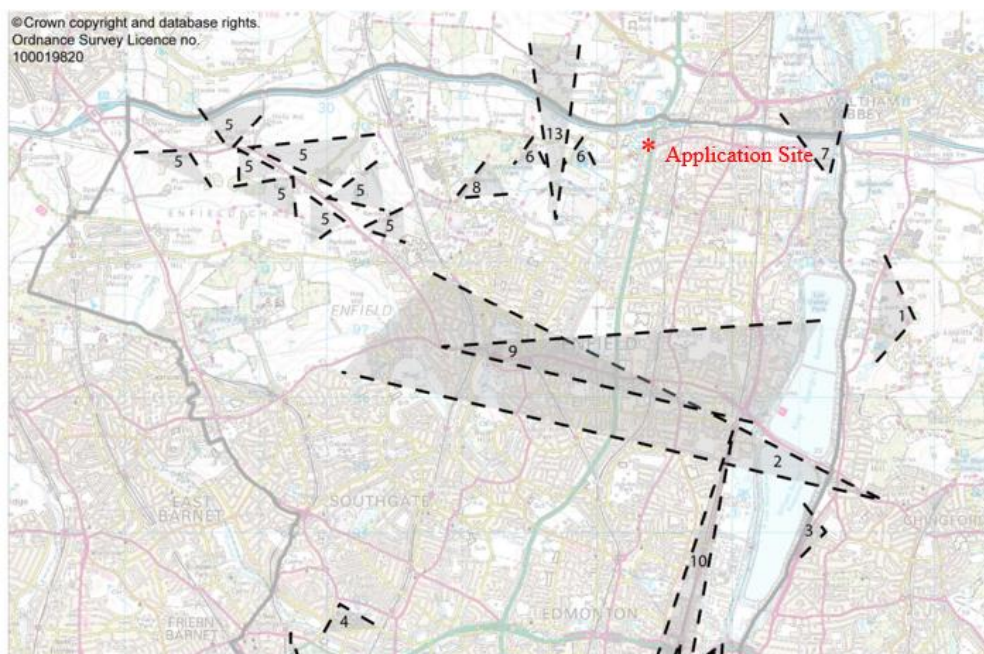


Figure 1: Report on Location of Tall Buildings and Important Local Views in Enfield (March 2013) - the approximate location of the site is shown in red.

- 9.55. In respect of the impact on Viewpoint (6) Whitewebbs, (8) Clay Hill and (13) Forty Hill – as identified in 'Location of Tall Buildings and Important Local Views in Enfield (March 2013)', it is important to note that visibility does not immediately equate to

heritage harm. Following concerns raised by members of the public, the Conservation Officer was asked to consider the potential impact upon the aforementioned views. The Conservation Officer confirmed:

- *Enfield Viewpoint 6 – These viewpoints face south. The application site is located to the north-east of these viewpoints. The development will not feature in these views.*
- *Enfield Viewpoint 8 – This viewpoint faces north-east towards the application site. The length of the viewpoint is visually depicted on the diagram. In this instance it shows a mid-distance view. Taking into account this and the ZTV evidence it is unlikely the scheme would be a prominent feature of this view (if visible at all).*
- *Enfield Viewpoint 13 – This viewpoint faces north. The application is located to the north-east of this viewpoint. The development will not feature in this view.*

Heritage Conclusions

- 9.56. The steps for assessing proposals affecting heritage assets are as set out in the NPPF Section 16: Conserving and Enhancing the Historic Environment and amplified by Historic England GPA 3: The Setting of Historic Assets. The duty to pay 'special regard' or 'special attention', in sections 16(2), 66(1) and 72(1) of the Act (1990) means that there is a 'strong presumption' against the grant of planning permission where it would cause harm to a heritage asset³. Harm should be minimised and the desirability of enhancing the asset considered. Any harm to a designated asset requires 'clear and convincing' justification. For non-designated heritage assets there should be a 'balanced judgement' between harm and the significance of the asset.
- 9.57. Officers consider that the proposed scheme would not cause harm to the New River and Forty Hill Conservation Area, subject to the scheme being high quality. The western façade of the proposed building facing the New River will contain fenestration and substantial green walls to generate architectural interests. Large scale details of junctions and materiality have also been provided. The final details of the materials to be used and the landscaping proposal including boundary treatments on New River would be secured by conditions to ensure the scheme contributes positively to the setting of the New River and Forty Hill Conservation Area.

Archaeology

- 9.58. G.L.A.A.S has reviewed the Archaeological Desk-based Assessment and confirmed that the proposed development would not result in significant harm on the Whitewebbs Hill, Bulls Cross and Forty Hill Archaeological Priority Area subject to a Written Scheme of Investigation condition to ensure all historic environment investigation and recording is appropriately controlled. A condition has therefore been attached.

Neighbouring Residential Amenities

Daylight, sunlight and overshadowing

- 9.59. 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.

³ Kinsey vs. London Borough of Lewisham 2021 (para.82)

- 9.60. Objections have been raised during the consultation process from neighbouring properties, notably in the Bells Moor Gardens, regarding the impact of the proposed development on daylight and sunlight available to surrounding properties.
- 9.61. The Applicant has submitted a Daylight & Sunlight Report based on the Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice (2011)', which sets out the tests used to assess daylight and sunlight impacts of development on neighbours, future occupiers of the development and adjacent open spaces. The 2011 standards have been superseded by new 'Site Layout Planning for Daylight and Sunlight: a guide to good practice' (BRE, 2022). However, the 2011 standards were in place at the time of the submission of the application. The new guidance has not materially changed the assessment of the daylight and sunlight to neighbouring properties, as such, this element of the assessment would not be affected.
- 9.62. Neighbouring properties were identified as relevant for daylight and sunlight assessment based on orientation and proximity to the proposed development. The submitted report has been completed by daylight/sunlight specialists.
- 9.63. The results show that the proposed development would satisfy BRE Guide default targets for Vertical Sky Component (VSC) levels in all windows in the adjoining two storey houses to the north (Plot 6 – 9 /Copse Close 9 -11) except a secondary ground floor window serving the kitchen/living/dining room of Plot 6 (Copse Close 11). The infringement on the VSC of this window is considered relatively minor with the window retaining a VSC of 25.57%, only slightly below the 27% recommended in 2011 standards.
- 9.64. The No-Skyline (NSL) calculation indicates all rooms of these three neighbouring houses also meets the BRE default targets. In Plot 6, 94.4% of the kitchen/living/dining room retains direct skylight. The Average Daylight Factor (ADF) of this room also exceeds the minimum recommended target in 2011 standards. Considering the above, it is therefore considered that the proposed development will not have a detrimental impact on the skylight to the existing houses to the north (Plot 6 – 9 or Copse Close 9 -11).
- 9.65. In addition, sunlight to these neighbouring buildings would fully satisfy BRE's criteria in terms of annual probable sunlight hours (APSH) and the APSH in the winter months (WPSH) received by the south facing windows at Plots 6, 7, and 8.
- 9.66. In terms of overshadowing to the amenity lawn between the houses and the proposed development, the impact would also meet the BRE default targets as 56.4% of amenity area receives at least two hours of sunlight on 21 March after the development.
- 9.67. Overall, it is considered that the proposed scheme has been designed to respond to BRE's criteria while delivering the quantum of affordable housing and meet the relevant policies within Enfield's Local Plan and The London Plan. On balance, it would not have an unreasonable impact on neighbouring residential occupiers in terms of loss of daylight, sunlight and overshadowing.

Overlooking

- 9.68. The northern wing of the proposed building will be sited 16-25m away from the nearest neighbouring houses to the north with generous communal amenity space in

between. Given the proposed separation distances, it is considered overlooking impacts are proportionate and would not be unreasonable.

Noise and Disturbance

- 9.69. The principle of residential-led redevelopment has already been established by the unimplemented permission (ref: 17/05227/FUL). A minor addition of two dwellings would not result in any material impacts on the occupiers of the adjoining properties in terms of noise and disturbance. A piling method statement will also be secured via condition to protect residents from noise and disturbance. No external plant is proposed. A compliance condition has also been attached to limit the background noise of any external plants in the future.

Conclusion on Neighbouring Residential Amenities

- 9.70. Having regard to the above, the proposal would not cause any significantly detrimental impact upon the amenities of any neighbouring dwellings in terms of noise, disturbance, daylight, sunlight, outlook and overlooking. It would be in accordance with Policies D3, D4, D6 and D14 of the London Plan (2021), CP 4 of the Enfield Core Strategy (2010) and Policies DMD 8, 10, 37, and 68 of the Enfield Development Management Document (2014).

Quality of Accommodation

Unit and Bedroom Size, Storage and Floor to Ceiling Heights

- 9.71. Policy D6 of the London Plan (2021) sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces.
- 9.72. All units meet internal floorspace standards required by London Plan Policy D6, Table 3.1. The majority of the homes will also further meet individual room standards (London Housing Design Guide is cited as best practice in section 5.3 of the Development Management Document). A condition will be attached to explore the possibility of reconfiguring the internal layout of two 2 bed 4 person units (Unit 19 and 26) to create larger living areas at the expense of a second shower room.
- 9.73. The submitted sections of the proposed building demonstrate that the total gross floor internal area of all the proposed homes would meet and exceed a minimum floor to ceiling height of 2.5m required by the London Plan (2021).

Light, Outlook and Layout

- 9.74. The submitted Daylight and Sunlight Assessment has demonstrated that 92.0% of the proposed habitable rooms would achieve the direct skylight recommended by BRE 2011 standards.
- 9.75. 97.7% of the proposed habitable rooms would achieve the ADFs recommended in BRE 2011 standards. The two rooms that fall below the recommended values, would both achieve an ADF of 1.5% or more.
- 9.76. 27 of the 29 proposed dwellings have a main living room that would achieve both the APSh and WPSH recommended in BRE 2011 standards. The two dwellings (Unit 17

and 24) that fall below the recommended values, would have main living rooms receiving APSH of 19% and 20%, which is not substantially below the recommended 25%, and WPSH of 8% and 9%, which is still almost double the recommended 5%.

- 9.77. It is noted that the approach to assessing internal daylight and sunlight has moved from Average Daylight Factor (ADF) to either Median Daylight Factor or Illuminance in the new BRE guidelines. However, as mentioned in the above section, the 2011 standards were in place at the time of the submission of the application. An assessment based on the new BRE guidelines is not necessary as the development achieves 100% dual aspect, which is an excellent result providing naturally ventilated homes with good levels of daylight and sunlight.
- 9.78. Whilst most of the bathrooms do not have potential for natural light and ventilation to these spaces, this is a common feature of modern development and sufficient mechanical ventilation is provided.
- 9.79. Provision of natural light to the lobby and both stair cores is also supported.

Noise

- 9.80. The site is close to Bullsmoor Lane and the A10. The internal layout has been carefully designed to maximise the provision of bedrooms facing the podium. Whilst the bedrooms on the first floor face the A10, there are limited options for reorganising internal spaces. The Acoustic Report has demonstrated that the proposed flats with sound attenuation measures including triple glazing windows, sound proofing building envelopes, and MVHR will meet the recommended internal noise levels set-out in BS8233:2014 - Guidance on Sound Insulation and Noise Reduction for Buildings. The Environmental Health Team have confirmed the proposed measures will be acceptable. A condition will be attached to ensure compliance.
- 9.81. The proposed MVHR units will be contained within a storage room within each flat. The indicative specification for the MVHR units has shown the acoustic rating and the acoustic performance of the room partitions. Officers are satisfied at this stage that the provision of MVHR units would not result in detrimental noise to the future occupiers subject to final details of the MVHR units, which will be conditioned. The acoustic testing of the partitions will be assessed separately at the Building Control Stage.

Privacy

- 9.82. The outline Landscape Strategy demonstrates that sufficient defensible space will be provided to the ground floor units including some ornamental trees in the forecourts of Unit 5 and Unit 6 to safeguard the privacy of the future occupiers while maintaining a degree of passive surveillance to the street. Details of the landscaping and boundary treatments would be secured via a condition.
- 9.83. As mentioned above, the windows of the proposed homes in the northeast portion of the site have been positioned to maximise the effective distance between units. Also, homes on the northern wing of the development has been carefully designed to contain fewer private rooms such as bedrooms on the affected facade.
- 9.84. On upper floors, where homes are accessed via a deck, kitchens are placed facing the deck. This strategy is supported as these rooms are the least sensitive to privacy issues.

Amenity Space and Play Area

- 9.85. DMD Policy 9 requires provision of adequate, accessible and functional amenity spaces.

Private amenity space

- 9.86. Private amenity space will be provided to all units in the form of balconies and/or private gardens. It is noted that only 7 sqm of private amenity space will be provided for the 3 bed, 6 person unit (Unit 5) on the podium. The shortfall of 2 sqm is considered acceptable in this instance as there is sufficient provision of communal space, and a larger balcony may compromise the overall design of the podium.
- 9.87. It is also noted that two separate balconies will be provided for Units 27, 28, 29 where one of the balconies would only be accessed via a bedroom instead of the communal area. Although this deviates from best practice, it is considered the proposed balconies would be acceptable in this instance as the combined size of the two balconies would still meet the minimum area requirement of 10sqm for a 3 bed 6 person unit. Officers have also weighed the benefit of providing two balconies as proposed, compared with one single larger/deeper balcony which would have the potential to reduce natural light to the windows / habitable rooms below, in addition to potential impacts on visual appearance.
- 9.88. Furthermore, all private amenity areas on the podium have been revised to allow for a 0.75m width raised privacy planter. Defensive planting has also been added to the kitchen window of Unit 10.
- 9.89. It is noted that based on the indicative visualisation, the front garden of Unit 7 will be delineated by high garden fences and an entrance gate fronting onto Bullsmoor Lane in an attempt to increase privacy of this amenity space. However, it would reduce the legibility of the entrance, and make delivery to this units difficult. Hence, revised details of the boundary treatments will be secured as part of the landscaping condition.
- 9.90. The submitted acoustic report shows the balconies in the eastern elevation overlooking the A10 and those facing the New River and Bullsmoor Lane would be exposed to noise levels of LAeq 64dB and LAeq 67dB respectively, which is higher than the upper limit set out in BS8233 (LAeq 55dB). It is acknowledged that it is highly unlikely that noise levels can be within the upper limit without fully enclosing the balconies. However, further details in respect of the sound proofing performance of the proposed balconies design is recommended to be secured. A condition has been attached to request details of the balconies to ensure robust mitigation measures have been explored and external noise levels minimised. For example, a more solid balustrade surrounding these balconies could provide noise mitigation and improve the sense of privacy of these balconies.

Podium

- 9.91. In addition to the private amenity spaces, all homes would benefit from a communal garden on the podium which would also serve as doorstep play space for under 5's in accordance with the Play and Informal Recreation SPG (2016).

- 9.92. The void in the podium is considered necessary for cranes to construct the proposed building and enable future maintenance of the façades facing the courtyard as the site is bordered by the New River to the West without any vehicular access. Options of different sizes and positions of the voids have been explored. The revised design of the podium has also been improved by reconfiguration to a more usable layout, introduction of new seating, 1.2m wide access for wheelchair users, and 1.1m high visually permeable balustrades along the western edge. The details such as planting, seating, play equipment, and balustrades would be secured by a condition.
- 9.93. In order to address the shortfall in on-site play space provision of 140sqm for children aged between 6 and 18, the Applicant will make a financial contribution to improve the existing play space in Aylands Open Space, which is located within 10 mins walking distance from the site and near to the local shopping parade. Different sites for financial contribution have been explored with the Applicant and the Council's Parks Team (See Section 6). It is considered that the proposed provision of play space together with an off-site financial contribution would be acceptable in accordance with Policy S4 of the London Plan (2021).

Flood Risk and Drainage

- 9.94. Policy SI 13 of the London Plan (2021) requires development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the specified drainage hierarchy. Policy DMD 61 states developments should seek to achieve Greenfield runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) year events and must maximise the use of Suds, including at least one 'at source' SuDS measure resulting in a net improvement in water quantity or quality discharging to sewer in-line with any SuDS guidance or requirements.
- 9.95. Flooding is not a known risk on this site. Classed as Flood Risk 1, the site is at low risk of flooding.
- 9.96. The proposed building will maintain a minimum 8m wide buffer from the New River in accordance with DMD 63. The Applicant has engaged with Thames Water during pre-application. Thames Water has reviewed the proposal and confirmed no objection to the proposed development.
- 9.97. The existing site mainly comprises impermeable surfaces. During pre-application stage, the Applicant has explored the possibility of discharging the runoff into the New River with Thames Water in accordance with London Plan Drainage Hierarchy. Given New River is a clean water resource, Thames Water does not support this option. This option is therefore considered infeasible. A preliminary SuDS strategy has been submitted with the application. Extensive SuDS source control features including rain gardens, permeable paving and green roof on the podium with rainwater planters are supported. The Council's Watercourses Team have requested the detailed calculation of the runoff rates achieved with details of the proposed SuDS features and a management plan for future maintenance. The requested information would be secured by way of condition in accordance with Policies SI 12, SI 13 of the London Plan (2021), Policy CP 28 of the Enfield Core Strategy (2010) and Policies DMD 59, DMD 61 and DMD 63 of the Development Management Document (2014).

Biodiversity, Trees and Landscaping

- 9.98. Policy DMD 76 states that development on sites that abut a wildlife corridor will only be permitted if the proposal protects and enhances the corridor. Policy DMD 78 states that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided, and it has been demonstrated that appropriate mitigation can address the harm caused. Mitigation will be secured through planning obligations or planning conditions.
- 9.99. Policy G7 of the London Plan (2021) and Policy DMD 80 of the Development Management Document (2014) state that any development involving the loss of or harm to protected trees or trees of significant amenity or biodiversity value will be refused.

New River SINC, Lee Valley SPA and Epping Forest SAC

- 9.100. The site is mainly comprised of hardstanding now and hedge along the southern boundary. It adjoins the New River SINC and Wildlife Corridor, and is within 5km of the Lee Valley Special Protected Area (SPA) and Epping Forest Special Area of Conservation (SAC).
- 9.101. A submitted Ecological Appraisal Report with an ecological desk study concludes that none of these sites will be directly affected by the proposed development given the scale of the development and all ecological links will be maintained. The current proposal would involve only a minor uplift of 2 units from the unimplemented planning permission (ref: 17/05227/FUL). The impact of this proposed development on these designated ecological sensitive sites would not be materially different from the previous planning permission. Natural England has confirmed no objection to the proposal. It is considered that the Ecological Appraisal Report forming the Habitat Regulation Assessment can be adopted by the Council as Competent Authority in order to comply with the Habitat Regulations.

Habitats and Trees

- 9.102. There is only one Category U tree on site which would be removed. The Tree Officer has confirmed no objection to the proposal. A total of 18 new trees will be planted together with mature hedges, intensive planting including rain gardens on Bullsmoor Lane and the podium. There will also be green walls on majority of the western façade.
- 9.103. The proposed landscape scheme would meet the Urban Greening Factor (UGF) target of 0.4. The biodiversity units will also increase from 0.11 units to 0.21 units, equivalent to a Biodiversity Net Gain (BNG) of 89.5%. This would exceed the emerging statutory minimum BNG requirement of 10%.
- 9.104. It is noted that the UGF is calculated based on the site area within the Applicant's ownership only. Copse Close and the associated soft landscaping on the western side of this road, which are not owned by Applicant and form part of this application site boundary, are not included in the indicative UGF calculations. A strip of existing soft landscaping area along the western side of Copse Close will be paved to create a new pedestrian footway with a new crossover for this proposed development. A revised Urban Green Factor calculation based on the larger site area therefore will be secured as part of the landscape condition to explore integration of acceptable surface cover types on this area where possible or further greening across the wider site in accordance with the Draft GLA Urban Green Factor Guidance (2021).

- 9.105. A detailed maintenance plan including a revised maintenance access to the ground-based green walls and rain gardens in the western portion of the site will be secured to ensure the future maintenance is convenient and suitable. Detailed landscaping plans and an Ecological Management Plan will also be secured by a landscaping condition to ensure the local biodiversity and the greenery would be enhanced for a period of at least 30 years in accordance with Policy DMD 81.
- 9.106. The Applicant will also make a financial contribution to enhance the planting on the existing low ecologically valued grass verges on Bullsmoor Lane (adopted highway), and the future maintenance of the new planting. This would be secured within the shadow S106.
- 9.107. The Applicant and Watercourses Team have also explored the possibility of introducing a new rain garden on the hardstanding build-up area at the junction between Bullsmoor Lane and Copse Close to enhance the public realm. However, due to viability of the scheme, the Applicant cannot make this financial contribution. The Watercourses Team will deliver the rain garden separately independent of this application with alternative funding in the future.

Protected Species

- 9.108. The submitted Ecological Appraisal Report indicates that the majority of the habitats and plant species observed on site are widespread and common; the habitats are of negligible nature conservation value from a botanical perspective. The Report recommends any new lighting would be carefully designed to minimise potential light disturbance and fragmentation impacts. A condition therefore has been attached to request the external lighting details.
- 9.109. The Report also recommends other ecological enhancement measures such as at least 1 Bat Box, 4 bird boxes, 2 insect boxes and hedgehogs-friendly fencing. These measures would be secured via a condition in accordance with DMD Policy 79.

Conclusion on Biodiversity, Trees and Landscaping

- 9.110. Considering the above, the proposed development would not result in any significant harm to the protected tree or the local wildlife including the New River SINC, Lee Valley SPA and Epping Forest SAC, and would enhance the local biodiversity and greening subject to further details on the landscaping scheme and the biodiversity enhancement measures, which would be secured by conditions. The proposal therefore would comply with Policies G6 and G7 of the London Plan (2021), Policy CP36 of the Enfield Core Strategy (2010) and Policies DMD76, 78, 79, 80 and 81 of the Enfield Development Management Document (2014).

Traffic, Access, Parking

- 9.111. The site is located less than 50m from the A10 Great Cambridge Road, which forms part of the Transport for London Road Network (TLRN).
- 9.112. The site has a Public Transport Accessibility Level (PTAL) of 1B. There are several bus stops within walking distance on Great Cambridge Road. The nearest train station (Turkey Street) is circa 1.1km (approximately 7-minute cycle or 17 minutes' walk) away. Capel Manor Primary School and Orchardside School are located on Bullsmoor Lane. A local shopping parade with groceries, shops and restaurants are

located within 400m of the site (approximately 5 minutes' walk) on the eastern section of Bullsmoor Lane.

Trip Generation

- 9.113. The number of proposed dwellings has increased by 2 units from the unimplemented permission (ref: 17/05227/FUL). The trip generations would not significantly increase from the previous permission. The Transportation Team, Transport for London and National Highway have all confirmed no objection to the proposal as the proposal would not result in any detrimental impact on the levels of service on footways and bus services, nor on the local highway network including M25 Junction 25 and Bullsmoor Lane.

Vehicular and Pedestrian Access

- 9.114. A new vehicular access is proposed from the access road to the east of the site. This is a shared access to adjacent Bells Moor Gardens development.
- 9.115. The Transportation Team has confirmed that although Bullsmoor Lane is heavily used, the existing 'Keep clear' markings would be sufficient to protect the exit directly to Bullsmoor Lane from the direct vehicular access from the north and side access from the east. TfL has also confirmed no objection to the proposed use of the Copse Close access. This proposed vehicular access is considered an improvement on the unimplemented planning permission (ref: 17/05227/FUL) in which the existing vehicular access directly off Bullsmoor Lane would have been used with an increased intensity but in close proximity to Copse Close. In the Bells Moor Gardens development (ref: 17/05528/FUL), the LPA has secured a financial contribution to conduct a safety audit, which can be used to monitor the junctions when needed.
- 9.116. The Applicant has been negotiating an easement arrangement with the landowner for the proposed vehicular access and pedestrian access on Copse Close. A condition has therefore been attached to ensure that both the proposed pedestrian and vehicular access will be completed prior to the first occupation of the first dwelling.
- 9.117. New pedestrian links between the footway on Bullsmoor Lane and some entrances of the building will also be created via the existing grass verges on public highway. The works will be secured by Highways Contribution.

Parking

- 9.118. Two Parking Surveys have been undertaken to establish the on-street parking availability within the standard 200m walking distance around the site. However, it is noted that the A10 acts as a barrier to the spaces on the eastern side of Bullsmoor Lane and these spaces will be less likely to be used. The Surveys show that on average 57 spaces were available in total, and 38 were to the western side of the A10.
- 9.119. A total of 14 car parking spaces including 3 disabled parking spaces would be provided. The proposed bays meet the minimum dimensions including clear strips on either side of the disabled parking bays. It is likely that the 2 bed+ units (14 units) will generate a total demand of 14 spaces. Based on census data, it is estimated that the proposed 1 bed units would generate a car parking demand of approximately 6 spaces. The Transportation Team have confirmed that additional demand can be accommodated on nearby roads on the western side of A10 without tipping the parking situation to above 80% although there is a minor risk that Manor Farm Road

may reach full saturation if all the potential car parking demand is spilled to Manor Farm Road. However, it is highly likely that the future occupiers will park as close as possible to their flats on Bullsmoor Lane instead where there is sufficient on-site parking availability.

- 9.120. Representations have objected that the proposed development would make parking within Bells Moor Garden more difficult. There are 67 parking spaces for 56 units within Bells Moor Garden. Given the car parking spaces in Bells Moor Gardens are within private ownership, these spaces are neither considered in the Parking Surveys nor are relied to accommodate the car parking demand from the future occupiers.
- 9.121. Representations also raised concerns that an increased parking level on Bullsmoor Lane may impact safety and traffic flows especially during school pick up and drop off times. As mentioned in above, the additional demand for on-street parking will be limited. Furthermore, the school pick-up period in the evening does not generally coincide with peak parking hours. The Transportation Team have conducted surveys twice and confirmed that the proposed parking would not have negative impacts on the local highways.
- 9.122. Furthermore, the Applicant will explore the feasibility of a car club with a car club operator, and formulate a Travel Plan to reduce car usage and promote cycling and use of public transport among the future occupiers. These sustainable travel measures will be secured by the shadow Section 106 Agreement. A Healthy Streets Contribution has also been secured which would help deliver the emerging walking and cycling path along New River which improve the connectivity of the Site and promote sustainable mode of transport.
- 9.123. The Applicant has also confirmed that all the parking spaces will have electric charging points. The details will be secured via condition.
- 9.124. Considering the above, it is therefore considered that the proposed parking provision would comply with the maximum car parking standards stated in the London Plan (2021) and would not result in significant detrimental overspill parking in the area.

Cycle Parking

- 9.125. A total of 51 long stay bicycle parking spaces would be provided in a secured bike store on the ground floor and 2 short stay spaces of Sheffield Stand near the car park entrance. The proposed cycle parking provision is considered adequate and accessible. The proposed two-tier stands in the bike store is not usually preferred but is considered acceptable in this instance given the site constraints. During the course of this application, the Applicant has provided an indicative layout of the bike store the indicative product specification in the revised Design and Access Statement. A condition has been attached to request final details to demonstrate all the bike stands are fully accessible and ensure the bike store is provided prior to the first occupation in accordance with DMD Policy 45, Policy T6.1 of The London Plan (2021) and TfL London Cycle Design Standards (2014).

Servicing and Refuse

- 9.126. A communal bin store will be provided fronting Bullsmoor Lane. The proposed size would be sufficient to provide the required number and size of general and recycling bins as required by the Waste and Recycling Storage Planning Guidance (2010). It is acknowledged that future residents of the northern wing would have to carry their refuse bags for more than 30m (excluding any vertical distance), contrary to

paragraph 6.8.9 of Manual for Streets (2007). The option of introducing a refuse store to the north of the site has been explored. However, it has been discounted due to the resultant loss of an affordable home.

- 9.127. The new grade loading bay on Bullsmoor Lane will be sited in front of the communal refuse store to ensure the bin drag distance is within 10m as per the Waste and Recycling Storage Planning Guidance (2010). It is also close to the communal entrance for other deliveries. The Transportation Team have confirmed that a new grade loading bay will ensure deliveries and servicing do not obstruct the flow of traffic on Bullsmoor Lane, and the footway width is not compromised. The alterations to the public highway to provide the loading bay, and revised Traffic Regulation Order would be secured through a Highways Contribution.

Construction Traffic Management

- 9.128. National Highway has reviewed the Construction Environmental Management Plan and confirmed that given the 9-month construction timeframe, it is unlikely that the construction vehicles trips will generate any significant levels of traffic. TfL recommended a booking system for Heavy Good Vehicles (HGV) and use of Silver or Gold members of Fleet Operators Recognition Scheme (FORS). These requirements together with some additional information of the Construction and Logistic Plan will be secured via a condition.

Conclusion on Traffic, Access and Parking

- 9.129. Overall the Transportation Team have no objection to the proposed development subject to conditions. The proposed development would not result in conditions prejudicial to the safety and free flow of traffic in the surrounding area subject to Highway Contributions for the required highways works. Also, sustainable modes of transport would be promoted subject to cycle parking store details, sustainable travel package to the future residents and a Healthy Streets Contribution. Hence, the proposal would comply with Policy T6.1 of the London Plan (2021), Policies CP22 and CP25 of the Enfield Core Strategy (2010) and Policies DMD45 and DMD47 of the Enfield Development Management Document (2014).

Carbon Emissions and Sustainability

Operational carbon emissions

- 9.130. London Plan Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations, 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 (PV).
- 9.131. The submitted Energy Statement has provided detailed calculations on the operational carbon emissions based on SAP10 methodology. This application was validated in April before the new Part L requirements came into force in June. Hence, the use of Part L 2013 methodology is acceptable in accordance with the GLA Energy Assessment Guidance updates (2022).
- 9.132. The proposed development would exceed the 'Be Lean' target (10%) through high performance internal fabrics such as triple glazing windows, high levels of insulation and good airtightness. The resulting estimated Energy Use Intensity

(25.6kWh/m²/year) would even meet the Draft Local Plan target for 2030 (35kWh/m²/yr) – which is considered to represent a very good level of performance.

- 9.133. Energetik has confirmed that the site is beyond the planned routes of the District Heat Network. Mechanism ventilation system with heat recovery is provided for each unit. The proposed Air Source Heat Pump (ASHP) is equipped with reversable exchange for cooling, summertime boost and a high COP preventing the need for any gas connections to the scheme.
- 9.134. 90% of the roof space will be utilised for PV panels to generate an electricity output of 124 kWp. The total annual PV energy production would exceed the total regulated annual energy use. The Energy and Sustainability Statement demonstrates that the surplus energy would be sufficient to meet the majority of both regulated and unregulated energy demands particularly during summer.
- 9.135. Overall, the proposed development would achieve 100% regulated on-site carbon emissions reduction over Part L 2013. The Climate Change and Sustainability Team commended that the Energy Statement is comprehensive and concise. The proposed development would set an excellent example for zero operational carbon emissions in residential development and help address fuel poverty for lower income households.
- 9.136. A condition will be attached to request final Energy Performance Certificate and Display Energy Certificate after practical completion of the works. The post occupation energy performance will also be monitored in accordance with the GLA 'Be Seen' Guidance 2022, which would be secured by the shadow Section 106 Agreement .

Overheating

- 9.137. The assessment also demonstrates that the proposed development has followed the cooling hierarchy and mitigates overheating risk by prioritising passive measures such as dual aspects units, deeper windows reveals in the southern elevation, integrated automatic ventilation blinds on the southern and western elevation, and use of gallery access or balconies as shading device.
- 9.138. Active cooling through a highly efficient reversible ASHP is considered acceptable in this instance given the high efficiency of the MVHR system with a small resultant increase in cooling demand (See also the 'Operational carbon emissions' section) and the potential impacts of prolonged natural ventilation on the indoor air quality and acoustic environment due to the proximity to Bullsmoor Lane and the A10.

Embodied carbon emissions

- 9.139. With regards to embodied carbon, there is no policy requirement for whole life carbon assessments for non-referable applications. Nevertheless, the Design and Access Statement illustrates that the proposed development has an embodied carbon of 234.8 kg CO₂e/m², which would be meet the Draft Local Plan target for 2030 (300kWh/m²/yr).

Water consumption

- 9.140. Policy SI5 of the London Plan (2021) requires that development be designed so that mains water consumption would meet a target of 105 litres or less per head per day, excluding an allowance of 5 litres per head for external water use.

- 9.141. The Energy and Sustainability Statement demonstrates that majority of the new homes is estimated to use 100.4 – 101.4 litres of water per head per day, well below the London Plan target through efficient faucets and fixtures, dual-flush options and aerating the supply to reduce total volume of water in the flow.
- 9.142. It is noted that the water consumption of 6 homes (105.4 – 106.38 litres per head per day) would be slightly above the London Plan target. However, given the budget of a 100% London Affordable Rent scheme, more efficient appliances or instillation of water reclamation technologies would mean a trade off in other aspects. Since the majority of new homes can achieve a substantially lower water consumption than the target, it is considered that overall, the proposed development has maximised measures to reduce water consumption. A condition therefore has been attached ensure compliance.

Fire Safety

- 9.143. Since the top storey of the building is not 18 metres or more in height, the proposed building is not a relevant high-rise residential building as defined in Planning Practice Guidance (Reference ID: 71-004-20210624). A Fire Statement and Excavation Lift Capacity Assessment prepared by an accredited Fire Engineer has been submitted. The Fire Statement confirms that the products to be used are non-combustible, the evacuation routes are suitable with two separate stair cores and an evacuation lift, and sprinklers will be provided for each flat. It is unclear whether the accredited Fire Engineer has reviewed the suitability of the indicative sprinklers product. A condition has been attached to seek a revised Fire Statement to clarify this and the evacuation strategy for the wheelchair accessible unit on the first floor. The detailed design is expected to meet the Building Regulations in force at the time by way of approval from a relevant Building Control body. Having regard to the above, it is considered that the proposed fire safety arrangements are acceptable at the planning application stage subject to the aforementioned condition.

Air Pollution and Land Contamination

- 9.144. The Environmental Health Officer has confirmed that the proposed development would not result in air pollution and land contamination subject to conditions covering dust and emissions control measures during the construction and demolition stage in the Construction Management Plan, restrictions on the emissions from all non-road mobile machinery during demolition and construction, and a contamination remediation scheme.

Secure by Design

- 9.145. During the design process, a Secured by Design meeting was held with the Designing Out Crime Officer at Met Police, and feedback was integrated into the proposed design. Overall, the Met Police has confirmed no objection to the application. A condition has also been attached to ensure the proposed houses attain 'Secured by Design' certification in accordance with Policy D11 of the London Plan (2021) and Policy DMD 37 of the Development Management Document (2014).

Community Infrastructure Levy (CIL)

Mayoral CIL

- 9.146. Mayoral CIL is collected by the Council on behalf of the Mayor of London. The amount that is sought for the scheme is calculated on the net increase of gross internal floor area multiplied by an Outer London weighting (increased to £60per sqm as of 1st April 2019).

Enfield CIL

- 9.147. The Council introduced its own CIL on 1st April 2016. Enfield has identified three residential charging zones, and the site falls within the lower rate charging zone (£40/sqm).
- 9.148. Both CIL charging rates are presented prior to indexing. The proposed development would be CIL liable as it as it would create new dwellings. However, the proposed development involves 100% London Affordable Rent. It would be eligible for Mandatory Social Housing CIL relief.

Shadow S106 Heads of Terms

- 9.149. The Council is the current freeholder of the Site. It cannot enter into a Section 106 Agreement with itself and therefore a condition has been imposed ensuring that no development is commenced until anyone with a legal interest in the site has entered into a Section 106 Agreement to secure the relevant obligations as per the Section 106 to be attached to the condition the. A draft of the Section 106 Agreement is will be attached to the planning permission.
- 9.150. The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within a shadow Section 106 Agreement

Heads of Term	Description	Sum
Affordable housing	All the proposed units will be London Affordable rented	£0
	A minimum of 10% of all Affordable Housing Units will be M4(3) Compliant.	£0
Design	Retention of project architect	£0
	Design monitoring costs	£0
Education	Contribution towards improved education provision	73,515
Employment & Skills	Employment and Skills Strategy.	£0
Energy	Monitoring ('Be Seen' – GLA Energy Monitoring Portal).	£0
Play space	Contribution towards provision of play space off-site.	29,000
Sustainable Travel	Travel Plan	£0
	Travel Plan monitoring	5,250
	Explore the potential for a car club	£0
	Health Street contribution	8,809.00
Highway works	Service lay-by and realigned footway including associated Traffic Regulation Orders (TRO), pedestrian paving from the public footway to the entrances, tactile paving and new footway paving for the junction between Copse Close and Bullsmoor Lane, new soft landscaping along the existing grass verge on Bullsmoor Lane with at	The sum as reasonably determined by the LBE Highways

	least 3-year maintenance.	
Monitoring fee	5 per cent of the total value of all contributions; and a fixed charge to manage non-monetary obligations of £350 per head of term. Indexation will be applied.	

10. Public Sector Equality Duty

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

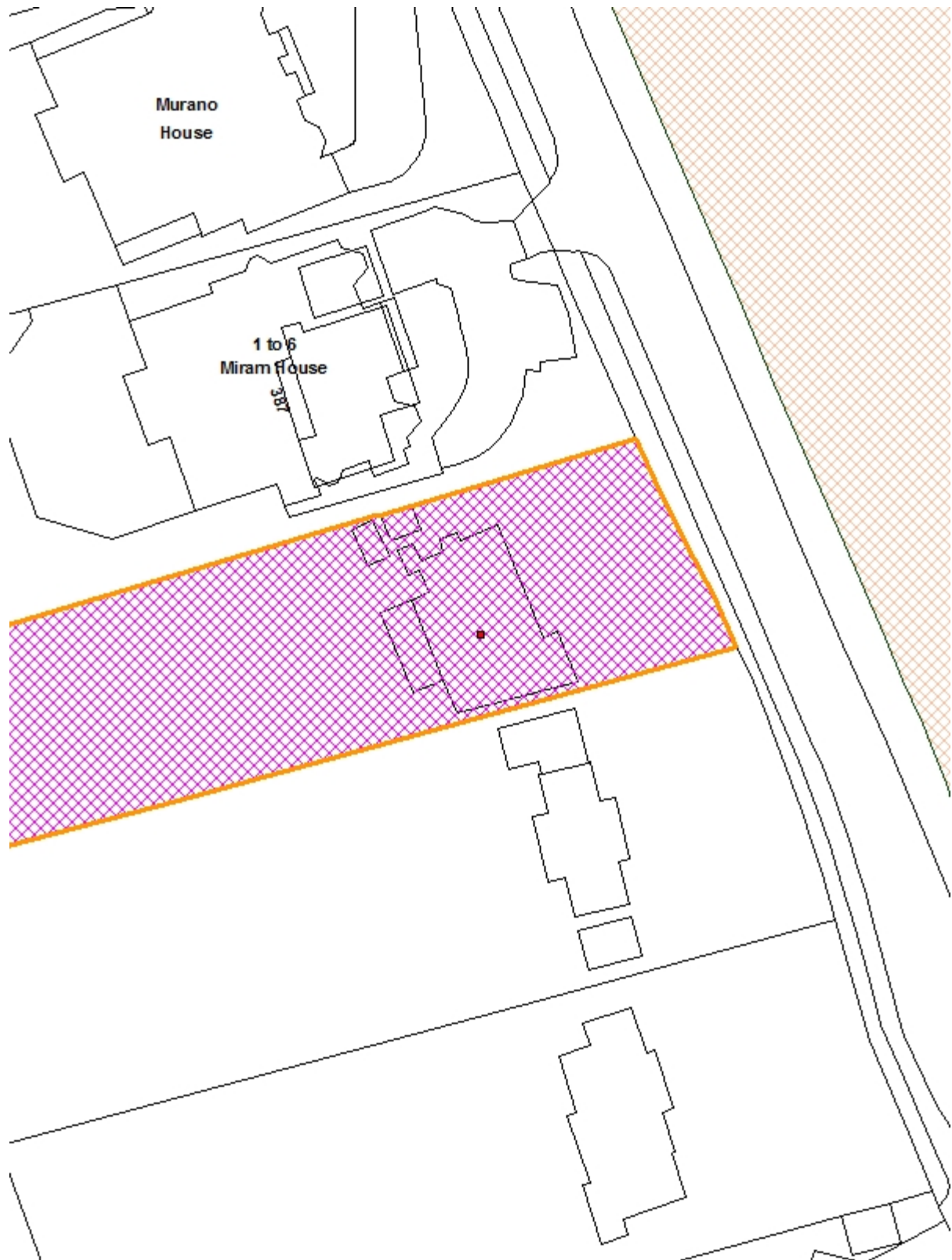
11. Conclusion

- 11.1. The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF states that planning permission should be granted unless "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed".
- 11.2. Members will be aware of the need to deliver more housing, including affordable housing in order to meet housing delivery targets. This proposed development would deliver 29 London Affordable Rent homes, which would help meet the pressing need for affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. In this context, the provision of 29 affordable homes weighs heavily in favour of the development.
- 11.3. The Applicant has engaged with the LPA undertaking extensive pre-application advice inclusive of the development being presented to the Enfield Design Review Panel. The pre-application process involved the Applicant considering design options to determine the most appropriate forms of development, and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 11.4. The current proposal is considered an improvement on the unimplemented planning permission for 27 flats (ref: 17/05227/FUL). The proposal would provide a significant increase in affordable homes which are of higher quality and more sustainable.
- 11.5. All homes would be dual aspects with generous internal spaces, high floor to ceiling height, excellent insulation and enjoy safer, more calming communal amenity space. The on-site energy generation is likely to cover the majority of the demand from the households, which would help tackle fuel poverty. The proposed shared vehicular access via Copse Close will also help improve the traffic flow on Bullsmoor Lane when compared with the unimplemented permission. Furthermore, the new financial contributions sought would benefit the wider communities through improving the existing play space nearby and the public realm on Bullsmoor Lane.

- 11.6. The public benefits of the development include: optimising the site (making effective use of a sustainable, accessible, brownfield site); providing genuinely affordable homes (contributing to the Borough's affordable housing delivery); social and economic benefits (providing jobs during construction); and substantially improved landscape areas (including green wall).
- 11.7. Overall and taking account of the presumption in favour and the weight to be given to development which provides new affordable homes, it is concluded that the development for the reasons set-out within this report, is acceptable and broadly accords with the policies of the Development plan where they are material to the development and other relevant material planning considerations including emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule, and within the shadow Section 106 Agreement, the application is recommended for approval.

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 18 October 2022
Report of Head of Planning – Vincent Lacovara	Contact Officer: Andy Higham David Gittens Kate Perry	Ward: Cockfosters
Ref: 22/01738/FUL		Category: Minor Application
LOCATION: 385 Cockfosters Road Barnet EN4 0JS		
PROPOSAL: .Redevelopment of the site involving demolition of existing dwelling house and erection of a 3-storey block comprising of 9 self-contained flats, together with single storey garden pavilion at rear, car parking spaces and new landscaping		
Applicant Name & Address: Mr Ellinas 385 Cockfosters Road Barnet EN4 0JS		Agent Name & Address: Nick Makasis GML Architects Unit 3, 1-4 Christina Street London EC2A 4PA
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 this report.		

Ref: 22/01738/FUL LOCATION: 385 Cockfosters Road, Barnet, EN4 0JS,



1 Note for Members

- 1.1 Although a planning application of this nature would normally be determined under delegated authority, the application is been reported to the Planning Committee for determination at the request of Cllr Georgiou due to the level of local interest.

2 Recommendation

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

1. Time Limit
2. Approved Plans
3. Approved Housing Mix
4. Finishing Materials
5. Surfacing Materials
6. Means of Enclosure
7. SuDS Implementation
8. Landscaping
9. Demolition and Construction Plan – Transport
10. Demolition and Construction Plan – Environmental Health
11. Control of Non-Road Mobile Machinery (NRMM)
12. No Impact Piling
13. Insulation and Ventilation
14. Tree Protection
15. Ecology
16. Bat and Bird Boxes
17. Nesting Birds

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

3 Executive Summary

- 3.1 The applicant seeks permission for the redevelopment of the site involving demolition of existing dwelling house and erection of a 3-storey block comprising of 9 self-contained flats, together with single storey garden pavilion at rear, car parking spaces and new landscaping.

- 3.2 The scheme is considered acceptable for the following reasons:

1. It would provide 56% family-sized units (3bedroom) (see section 9.3 of this report).
2. All units meet DCLG and London Plan Space Standards including gross internal areas, private outdoor amenity space, habitable room outlook and, floor to ceiling heights (see section 9.4 of this report).

3. It is sympathetically designed and in keeping with the emerging pattern of development (see section 9.5 of this report).
4. It does not have an unacceptable impact on neighbouring amenity (see section 9.6 of this report).
5. It meets London Plan parking standards including electric vehicle capabilities, cycle parking and disabled parking (see section 9.7 of this report).
6. It meets Energy and Water consumption requirements of 35% over part L (development achieves 63.31% and uses PV panels and individual heat pumps) and 105litres per person per day (see section 9.12 of this report).

4 Site and Surroundings

- 4.1 The application site is located on the west side of Cockfosters Road, which slopes south to north. The parallelogram-shaped site has an area of approximately 0.25ha in size or 2,500m², a depth of 91m and 24m wide. There is a significant fall in the site from the front to the back of approximately 7 metres over the 100 metre depth of the site. It sits between Miriam House (387) and Sambrook Court (383), both granted permission for redevelopment in 2014 and 2017 respectively.
- 4.2 The site contains a detached two-storey dwellinghouse with accommodation in the roof. The site has two vehicular access which lead to a paved area at the front for parking. The site has a large rear amenity space that stretches down towards Hadley Wood Golf Course which runs across the bottom of the site and is designated Green Belt. The site also faces further Green Belt which begins on the opposite side of Cockfosters Road. The site comprises a number of mature trees.
- 4.3 The surrounding area is predominantly residential in nature and is characterised by large family houses on large expansive plots set away from the highway. Dwellings generally have large front driveway/ gardens areas and large, deep rear gardens that back down onto Hadley Wood Golf Course to the rear of the site. More recently there have been a number of approved developments in the area for apartment blocks (please see relevant planning history), a number of which have been constructed.
- 4.4 The site has a PTAL 1a designation, representing very poor access to public transportation services. The closest northbound bus stop is approximately 50m away and the closest southbound bus stop is 118m away. Cockfosters Underground Station is approximately 1.3km to the south and Hadley Wood Train Station approximately 1.9km to the north-west.
- 4.5 The site is within Flood Zone 1. Areas classified as Flood Zone 1 are those that have less than a 0.1% chance of flooding.
- 4.6 The site is not located in a Conservation Area and does not contain a Listed Building.

5 Proposal

- 5.1 The applicant seeks permission for the redevelopment of the site involving demolition of existing dwelling house and erection of a 3-storey block comprising of 9 self-contained flats, together with single storey garden pavilion at rear, car parking spaces and new landscaping.
- 5.2 The development would create 5 x 3bed, 3 x 2bed and 1 x 1bed self-contained units.

- 5.3 Cycle storage and refuse storage would be located at the front of the site.
- 5.4 The site will retain one of two existing vehicular accesses.

6 Consultations

Internal

Consultee	Objection	Comment
LLFA	No	No objection following provision of additional information. Condition required regarding implementation of approved drainage/SuDS
Environmental Health	No	Conditions required regarding emissions and non-road mobile machinery, no impact piling without approval from LPA, limits on sound during construction and the requirement of a construction management plan.
Trees	No	No objection subject to the Arboricultural report being adhered to.
Transportation	N	Condition required regarding construction management plan

External

- 6.1 Historic England: No objection

Public

Number notified	35
Consultation start date	09.06.2022
Consultation end date	03.07.2022
Representations made	3
Objections	2
Other/support comments	1

- 6.2 Three representations were made during the consultation period, two objections and one comment in support of the proposal. The representations may be summarised as follows:

- Overdevelopment
- Too close to adjoining properties
- General dislike of proposal
- Inadequate private amenity space
- The outbuilding is too large
- The outbuilding is too tall
- Strain on local infrastructure
- Strain on community facilities
- Increase in traffic
- Inadequate public transport provisions
- Increase of pollution
- Noise nuisance

- Inadequate parking

7 Relevant Planning History

Application Site

- 7.1 21/02557/PREAPP | Proposed demolition of single family dwelling and creation of 9 self-contained units
Closed 29.07.2021
- 7.2 TP/04/0093 | New pitched roof to replace existing flat roof together with loft conversion incorporating a rear dormer window.
Granted with conditions 23.02.2004
- 7.3 TP/95/0638 | Construction of hipped roof at side of existing house, construction of boiler housing at side, and erection of a front entrance porch, and raised patio to rear.
Granted with conditions 18.09.1995
- 7.4 TP/73/0953 | 2 STOREY
Granted with conditions 03.09.1973

Sites along Cockfosters Road

- 7.5 **357 Cockfosters Road**
20/01831/FUL | Redevelopment of site involving demolition of buildings and erection of 2 storey building with rooms in roof to provide 24 residential units within 3 blocks with basement level associated parking and landscaping.
Refused (20.10.2020) for the following reasons:
 1. Overdevelopment
 2. Substandard private and communal outdoor amenity space
 3. Overlooking
 4. Overprovision of parking
 5. Inadequate cycle storage
 6. Inadequate refuse and recycling storage
 7. Impact on and loss of trees and absence of AIA
 8. Inadequate affordable housing provision
 9. Failure to meet SuDS requirements
 10. Lack of FRA submitted in relation to basement
- 7.6 **397 Cockfosters Road**
20/00353/FUL | Redevelopment of site and erection of part 2, part 3 storey building with lower ground level (basement) to provide 11 self-contained flats with solar panels, terraces and balconies and associated landscaping and parking.
Granted with conditions 24.02.2021 (granted at Planning Committee 24.11.2020)
- 7.7 **381 Cockfosters Road**
17/02323/FUL | Redevelopment of site and erection of 2 storey block of 9 self-contained flats comprising 8 x 2 bed and 1 x 3 bed with basement level, terraces and balconies, installation of lift and associated parking and landscaping.
Granted with conditions 17.05.2018
- 7.8 P14-02203PLA | Redevelopment of site and erection of a new block of 9 flats (comprising of 1 x 3 bed, 6 x 2 bed and 2 x 1 bed).
Granted with conditions 20.03.2015

7.9 383 Cockfosters Road

P14-02130PLA | Redevelopment of the site to create 9 flats (6x2-beds,3x3-beds) and associated parking.
Granted with conditions 27.04.2017

7.10 387 Cockfosters Road

P13-03013PLA | Demolition of existing dwellinghouse and erection of a 2-storey block of 6 x 2 bed self-contained flats, incorporating accommodation in basement and roof space, rear balconies and terraces, basement car parking, provision of associated surface car parking together with detached refuse building to front of site.
Granted with conditions 09.06.2014

8 Relevant Policies

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

National Planning Policy Framework 2021 (NPPF)

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 (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.

8.3 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 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.”

8.4 In the three years to 2021 Enfield only met 67% of its housing requirement and this means we now fall into the “presumption in favour of sustainable development” category.

8.5 This is referred to as the “tilted balance” and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most

important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

The London Plan 2021

- 8.6 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:

D3: Optimising site capacity through the design-led approach

D4: Delivering good design

D5: Inclusive design

D6: Housing quality and standards

D7: Accessible housing

D14: Noise

G3: Metropolitan open land

GG4: Delivering the homes Londoners need

GG6: Increasing efficiency and resilience

H1: Increasing housing supply

H2: Small sites

H10: Housing size mix

SI 2: Minimising greenhouse gas emissions

SI 5: Water infrastructure

SI 7: Reducing waste and supporting the circular economy

SI 12: Flood risk management

SI 13: Sustainable drainage

T1: Strategic approach to transport

T2: Healthy Streets

T5: Cycling

T6: Car parking

T6.1: Residential parking

- 8.2 Core Strategy (2010)

The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the Borough is sustainable

CP 2: Housing Supply and Locations for New Homes

CP 4: Housing Quality

CP 5: Housing Types

CP 20: Sustainable Energy Use and Energy Infrastructure

CP 21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure

CP 22: Delivering Sustainable Waste Management

CP 24: The Road Network

CP 25: Pedestrians and Cyclists

CP 28: Managing Flood Risk Through Development
CP 30: Maintaining and Improving the Quality of the Built and Open Environment

8.3 Development Management Document (2014)

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

DMD 3: Providing a Mix of Different Sized Homes
DMD 4: Loss of Existing Residential Units
DMD 6: Residential Character
DMD 7: Development of Garden Land
DMD 8: General Standards for New Residential Development
DMD 9: Amenity Space
DMD 10: Distancing
DMD 11: Rear Extensions
DMD 37: Achieving High Quality and Design-Led Development
DMD 38: Design Process
DMD 45: Parking Standards and Layout
DMD 46: Vehicle Crossovers and Dropped Kerbs
DMD 47: Access, New Roads and Servicing
DMD 48: Transport Assessments
DMD 49: Sustainable Design and Construction Statements
DMD 51: Energy Efficiency Standards
DMD 53: Low and Zero Carbon Technology
DMD 56: Heating and Cooling
DMD 58: Water Efficiency
DMD 59: Avoiding and Reducing Flood Risk
DMD 61: Managing Surface Water
DMD 68: Noise
DMD 79: Ecological Enhancements
DMD 80: Trees on Development Site
DMD 81: Landscaping
DMD 83: Development adjacent to the Green Belt

8.4 Other relevant Policy/Guidance

National Planning Policy Framework (NPPF)
National Planning Practice Guidance (NPPG)
DCLG Technical Housing Standards – Nationally Described Space Standard (2015)
London Housing SPG (2016)
London Cycle Parking Standards – Chapter 8
London Borough of Enfield Strategic Housing Market Assessment (2015)
Enfield Local House Needs Assessment (2020)
Enfield Waste and Recycling Storage Planning Guidance EN20/V2 (2020)
Enfield Strategic Flood Risk Assessment (2008)

9 Analysis

9.1 Principle of the Development

9.1.1 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. Furthermore, Para 120 of Chapter 11 (Making efficient use of land) of the of the NPPF (2021) expects Councils to promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

9.1.2 In principle therefore, the use of this site for residential purposes and more intensive residential development (where this is compatible with the character and amenities of the locality) is supported. Moreover, given the existing context of housing need within the Borough, the proposed 9 new dwellings (net increase of 8 which addresses the loss of the existing family dwelling house) 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 strategic housing delivery targets which is welcome.

9.1.3 It is also considered the proposal would be compatible with Policy GG2 (Making the best use of land) of the London Plan (2021). The policy seeks development to meet the following:

- c) proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- d) applying a design-led approach to determine the optimum development capacity of sites

9.1.4 Notwithstanding the presumption in favour of sustainable development and the tilted balance to be applied in assessing and weighing up the benefits of the scheme, it is important to considered the proposed development on its own merits and that it is assessed in relation to other material considerations. This will enable an informed opinion to be reached as to 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.

9.2 Housing Need and Tenure Mix

9.2.1 The London Plan (2021) sets a target for the provision of 52,287 new homes each year. In addition, the London Plan identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.

9.2.2 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 London Plan targets.

- 9.2.3 Policy H1 (Increasing housing supply) of the London Plan (2021) seeks to optimise the potential for housing delivery on all suitable and available brownfield sites especially on the sources of capacity including but not limited to small sites as identified in Policy H2 of the London Plan (2021).
- 9.2.4 The application site accords with Policy H1's identified need for housing and is appropriate for development for residential housing schemes.

Affordable Housing Provision

- 9.2.5 With reference to Policies CP3 and DMD 1 (Affordable Housing on sites capable of providing 10 units or more), no affordable housing is required to be provided in connection with this proposal as the development involves less than 10 units

Housing Mix

- 9.2.6 Policy DMD3 encourages a mix of housing types to be provided in residential development proposals. Where less than 10 units are created, developers are encouraged to provide different sized homes. For market housing this includes 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses (5-6 persons), and 20% 4+ bed houses (6+ persons).
- 9.2.7 The proposed development would provide 56% units which would be considered as family-sized homes. Whilst not strictly compliant with Policy DMD3, which relates more to dwellinghouses rather than flats, it is considered that the proposal, providing over 50% of family-size units, with 2 of the units at ground floor level and 2 at first floor level, all with adequate private amenity space and access to a large outdoor communal space and with use of a lift, would be acceptable and no objection is raised on this basis.

3 bedroom units	56% (5 units)
2 bedroom units	33% (3 units)
1 bedroom units	11% (1 unit)

Table 1: Proposed housing Mix

9.3 Standard of Accommodation

- 9.3.1 Policy DMD8 of the Development Management Document and Policy D6 of the London Plan set minimum internal space standards for residential development. The Department for Communities and Local Government's Technical Housing Standards - Nationally Described Space Standard (2015) applies to all residential developments within the Borough. The London Plan Housing SPG adopted in 2016 has been updated to reflect the Nationally Described Space Standards.
- 9.3.2 All units would meet or exceed the minimum Gross Internal Area (GIA) and built in storage requirements in line with space standards and Policy D6 of the London Plan. In addition, all bedrooms exceed minimum space standards outlined in policy D6 of the London Plan, including the two single bedrooms which both exceed the required 2.15m in width. All habitable rooms would have a floor to ceiling height of 2.5m. No objection is raised.

Unit	Type	Proposed GIA m ²	Minimum required m ²	Floor level	Proposed Storage m ²	Minimum m ²	Complies
1	3B6P	135	95	GF	3	2.5	Y
2	2B4P	98	70	GF	3	2	Y
3	3B6P	105	95	GF	3	2.5	Y
4	3B6P	130	95	FF	3	2.5	Y
5	2B4P	71	70	FF	3	2	Y
6	3B6P	97	95	FF	2.5	2.5	Y
7	3B5P	90	86	SF	2.5	2.5	Y
8	1B2P	55	50	SF	2	1.5	Y
9	2B3P	68	61	SF	2.5	2	Y

Table 2: Proposed GIA and built in storage by unit measured against London Plan policy D6 and table 3.1.

- 9.3.3 All bedrooms across all units (22 in total) have either front or rear facing (or both) windows. It is noted that three bedrooms (unit 1, B3, unit 4, B3 and unit 7, B3) rely on windows, are created by a projection from the flank of the proposed building in order to avoid side facing windows. A similar design was introduced at 387 Cockfosters Road and on balance is considered acceptable.

Private Amenity Space

- 9.3.4 Policy DMD9 and Policy D6 of the London Plan require new development to provide good quality amenity space that is not significantly overlooked by surrounding uses. Policy D6 specifically seeks a minimum of 5m² of private outdoor space should be provided for 1-2 person dwellings and an extra 1m² should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- 9.3.5 All units exceed the minimum standards outlined in Policy D6 of the London Plan (see table 3).

Unit	Type	Proposed amenity (m ²)	Minimum required (m ²)	Achieves min depth and width of 1.5m
1	3B6P	21	9	Y
2	2B4P	35	7	Y
3	3B6P	44	9	Y
4	3B6P	9.5	9	Y
5	2B4P	27	7	Y
6	3B6P	14.5	9	Y
7	3B5P	10	8	Y
8	1B2P	13.8	5	Y
9	2B3P	8.5	6	Y

Table 3: Private outdoor amenity space measured against London Plan policy D6

- 9.3.6 In addition to private amenity space all units have access to the large communal garden to the rear, as well as the pavilion. It is considered the amenity space arrangements are therefore acceptable.

9.4 Impact on the Character of the Surrounding Area

- 9.4.1 Chapter 2 'Spatial Development patterns' of the London Plan (Para 2.0.3) highlights that if London is to meet the challenges of the future, all parts of London will need to embrace and manage change. Not all change will be transformative – in many places, change will occur incrementally. This is especially the case in outer London, where the suburban pattern of development has significant potential for appropriate intensification over time, particularly for additional housing
- 9.4.2 Paragraph 3.1.7 of Policy D1 states as change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.
- 9.4.3 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".
- 9.4.4 Policy DMD 8 (General standards for new Residential development) expects development to be appropriately located taking into account the nature of the surrounding area and land uses, access to local amenities, and any proposed mitigation measures and be an appropriate scale, bulk and massing while Policy DMD 6 provides standards for new development with regards to scale and form of development, housing quality and density. Moreover, Policy DMD 37 encourages development to achieve a high quality and be design led. This is re-iterated by Policy CP30 of the Core Strategy as well as the fundamental aims of the NPPF. Policy CP30 seeks to maintain and improve the quality of the built and open environment. The fundamental aim of the NPPF is to secure sustainable development and to achieve sustainable development. A development is required to have a good design.
- 9.4.5 In terms of density of the site, the London Plan (2021) does not include a numerical standard for density, however, it is considered that by virtue of all space standards being met, and in addition adequate setback from the front and a large rear amenity space being retained, that the density of development would be acceptable.
- 9.4.6 With reference to the aforementioned policy context, Cockfosters Road has a varied appearance with recent development having a neo-Georgian form dwellings through the development of similar blocks of flats. These retain a deep frontage and large area of amenity space and but tend to include three floors of accommodation by utilising the roof.
- 9.4.7 The proposed design has been revised following discussions involving the applicant and the Council's urban design team. As a result, the roof profile reflects that of neighbouring development (aside from No 383 which is of a more modern design), the proposed building has been positioned further away from the road and at least 1.5m of defensible space has been included for front facing windows in Units 1 and 3 (ground floor).

- 9.4.8 When reviewing the front elevation, the height of the proposed building and its roof formation would respect that of its neighbours and would only be approximately 0.6m taller at its ridge than the existing dwelling at its highest point. This would not have any significance on the overall appearance in the street scene. The roof would be hipped with a flat crown and the space utilised for a green roof, photovoltaic panels and an extractor units for the heat pumps, alongside flat rooflights and one long lantern rooflight positioned toward the front, providing light to the communal hallway.
- 9.4.9 The proposed is slimmer than its immediate neighbours, owing to the site being less wide by comparison. The proposed bears more resemblance to the adjacent No 387 Cockfosters Road with a central gable, modest front dormers and a colonnade entrance, however the proposed design is simpler in form.
- 9.4.10 In terms of materials, the development would use London Stock Yellow brick (similar to Nos 383 and 389) but with diamond pattern detailing to the front and flank elevations. Further detailing would be provided with white cast stone string courses inserted to demarking the floor levels and for the door and windows surrounds and keystones. The roof would comprise grey slate tiles and the dormers zinc cladding, similar to Nos 379, 383, 387 and 389. The overall proposed design of the building is considered to be acceptable within the street scene.
- 9.4.11 In terms of massing and proximity to boundaries, drawing 4374/PA/031 indicates the proposed building would be sited 1.6m from the north boundary with No 387 and 2m from the south boundary with No 383. This is comparable to the recently developed No 383. No 387 does retain more distance to the boundary, however owing to the proposed being slimmer, the impact would not result in an overdominance nor lead to the creation of a continuous facade.
- 9.4.12 The rear of the proposed resembles that of the front in terms of material palette and design. Whilst adjacent neighbours have either dug down or included basement levels, the subject property has not and would incorporate wide steps down to the rear amenity space from private amenity terraces for the ground floor units. The steps would not be considered to be over-dominant in their context. Each balcony is enclosed with visually permeable metal railings, similar to those at No 383. The design at the rear is considered to be acceptable.
- 9.4.13 The proposal also includes a detached pavilion with a shallow asymmetric pyramid/hipped roof, sited within the rear communal amenity space toward the boundary with number 383. Following amendments, the pavilion has been reduced in size and moved away from Willow Tree (T10). It has also been reduced in height to a maximum of 5.1m (2.87m to 3.2m to the eaves), although as the ground slopes away, coupled with the hipped roof, the height will be considered to appear slightly less. The pavilion includes doors facing toward the rear of the site, which lead to a terrace, which in the main is facing No 387. The pavilion would provide ancillary amenities for the enjoyment of residents.
- 9.4.14 Within the context of a large plot with high and green boundaries, the pavilion would, on balance, be considered acceptable.

9.5 Impact on the Neighbouring Amenity

- 9.5.1 The National Planning Policy Framework identifies as a core planning principle that planning should always seek a high quality of design and a good standard of amenity for all existing and future occupants of land and buildings. Policy D3 of the London

Plan states that developments should have appropriate regard to their surroundings and enhance the local context. Policy CP 30 of the Core Strategy seeks to ensure that new developments are high quality and design-led, having regards to their context. Policy DMD 8 states that new developments should preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise, and disturbance.

- 9.5.2 Policy DMD 11 requires that a single-storey rear extension does not exceed a 45-degree line taken from the nearest neighbouring ground floor window or secure a common alignment of rear extensions. It also requires that first floor or higher rear extensions to not exceed a 30-degree line taken from the nearest corresponding neighbouring windows. Although not a rear extension, the above criteria are helpful in assessing impact to neighbours.
- 9.5.3 The properties most impacted by the proposed development are the immediate neighbours, Nos 383 and 387 Cockfosters Road.

383 Cockfosters Road

- 9.5.4 The main building breaches neither 45-degree nor 30-degree guidance. There are no flank windows proposed which would face No 383. The proposed pavilion at the rear of the subject site would be sited toward the common boundary with No 383. The pavilion would retain a distance of 2m from the boundary. Its highest point is 5.1m with a pyramid hipped roof formation. No 383 sits to the south of the subject property and loss of light from the pavilion would be unlikely. There are three windows facing the boundary, which do not open and would not result in any unacceptable noise / amenity impact. The terrace, whilst accessed from the rear of the pavilion, in the main faces No 387 and it would be less likely that residents would congregate to the rear, thus not unacceptably impacting the neighbouring amenity of the residents at No 387.

387 Cockfosters Road

- 9.5.5 The main building breaches neither 45-degree nor 30-degree guidance. There are no flank windows proposed which would face No 387. It is noted that the terrace for the pavilion will face No 387, however this will be approximately 14m from the boundary and for this reason unlikely to result in loss of light or privacy. It is accepted that there may be noise generation from the pavilion, however this will be residential-related and unlikely to be of a level considered to be unacceptable, indeed, no more unacceptable than resident congregating in the communal garden.

Both neighbours

- 9.5.6 It is recognised that due to the number of prospective occupiers and the balconies proposed, a greater sense of overlooking may be perceived for the immediately neighbouring occupiers. However, this is likely to be a similar position for a number of residents in the immediate length of Cockfosters Road and given the emerging pattern of development, notwithstanding the tilted balance that must be given weight in the overall planning balance of acceptability, is not considered to be unacceptable or lead to harm justifying a reason for refusal.
- 9.5.7 With regard to concerns raised about additional noise, pollution and disturbance, it is acknowledged that the proposed development will intensify the use of the site. However, given the spacing and separation to neighbouring properties and the overall size of the subject site, the quantum of development proposed is not considered unacceptable in this context. Furthermore, it will contribute to much need housing (including family accommodation) which will contribute to the strategic housing needs

of the Borough. On the advice of the Environmental Health Consultee conditions regarding construction vehicle emissions and non-road mobile machinery, restrictions on impact piling, as well as limits on sound levels during construction and the requirement of a construction management plan will be added to the decision, should permission be granted.

9.6 Highways, Access Car and Cycle Parking, Servicing and Construction Traffic

9.6.1 Policy DMD8 requires new residential development to provide adequate parking while DMD45 seeks to minimise car parking and to promote sustainable transport options. The Council recognises that a flexible and balanced approach needs to be adopted to prevent excessive car parking provision while at the same time recognising that low on-site provision sometimes increases pressure on existing streets.

9.6.2 Policy T6.1 of the London Plan (2021) sets out maximum parking standards for different land uses, as well as EV charging and disabled parking provision. The site has a Public Transport Accessibility Level (PTAL) of 1a which indicates that access to frequent public transport is very poor. Table 4 below provides a summary of the proposed parking which meets London Plan standards.

London Plan Guidance	Maximum for development according to guidance	Proposed
Up to 1.5 spaces per dwelling for 1-2 and 3+ bedroom dwellings in an outer London area with a PTAL rating of 1a	13.5 spaces (1.5 per unit)	9 spaces (1 per unit)
EV capabilities	20%	33%
Passive EV provision	Remaining spaces	All remaining spaces
Disabled parking	No numerical requirement for under 10 units	2 spaces

Table 4: Vehicular parking provision

9.6.3 The applicant has provided a Transport Statement which indicates that although far below the threshold required, that all residents will be provided a Travel Pack to encourage sustainable non-car travel. This is welcomed as mitigation and taking the likelihood of any on street parking and that the standard is a maximum, the revision is acceptable .

9.6.4 The Transport Statement also indicates that prior to commencement a Construction Logistics Plan will be provided. The LPA agree and this report already indicates that should permission be granted a Construction Management Plan would be required as a condition prior to commencement.

9.6.5 It is noted by the Transportation Consultee that the most northward of the two site accesses will be closed and the more southward access will be widened to 4.9m and will allow two cars to pass. The access will be set back 5m from the highway so vehicles may wait off of Cockfosters Road. Following further information being provided by the applicant in the form of visibility splays which confirmed are proposed at 0.6m for 2m either side of the access, the Transportation Consultee raised no objection to the access for the site. The applicant should note that any works in relation to crossovers or the highway will be undertaken by the Local Authority and at the

Applicants expense. It is also noted that the maximum width for a crossover is limited to 4.8m and on application for the crossover, the proposed may need to be reduced. An informative regarding this will be included in the decision notice should permission be granted.

- 9.6.6 A total of 18 long stay cycle parking spaces and two short-stay cycle parking spaces are required for the proposed development in accordance with the London Plan. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycle Design Standards (e.g. covered, secured, lit, etc.). Following additional information being provided regarding design and that the cycle storage is enclosed with solid walls rather than having open mesh sides, the Transportation Consultee raised no objection. It is noted there are two secure cycle units in front of flats 1 and 3 on the ground floor, these will be for the respective flat's use only to prevent unacceptable impact on amenity.
- 9.6.7 Policies DMD45 and DMD46 of the Council's Development Management Document seek to protect against an adverse impact on pedestrians and other road users. This would include during the demolition (where relevant) and construction process. Particularly as the access to the site is on a bend in the road, Transport have requested that both a Demolition Management Plan and a Construction Management Plan are produced for approval by the Council as a pre-commencement condition.

9.7 Refuse Storage

- 9.7.1 Policy DMD 47 specifies that new development will only be permitted where adequate, safe, and functional provision is made for refuse collection. Policy DMD 57 requires all new development to make appropriate provision for waste storage, sorting and recycling, and adequate access for waste collection. The Waste and Recycling Storage Planning Guidance from Enfield Council (EN20/V2) provides further specifications.
- 9.7.2 A bin store has been provided with access onto Cockfosters Road. It is considered there will unlikely be issues with refuse collection and further refuse vehicles will not be expected to enter the site. In this regard, it is noted the store has a door that does not open out over the highway and this is welcomed. No objection is therefore raised to this element

9.8 Sustainable Drainage Systems (SuDS) and Flood Risk

- 9.8.1 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 seeks to ensure a development such as the one proposed includes at least one 'at source' SuDS measure resulting in a net improvement in water quality. Policy DMD 59 requires new development to avoid and reduce risk of flooding and not increase risks elsewhere.
- 9.8.2 The applicant has provided an FRA & SuDS Strategy Report as supporting evidence for the proposal. The SuDS Consultee assessed the document and required further information regarding source control measures, greenfield runoff rate, cross sections of the detention basin showing the inflow and outflow levels, as well as overland flow routes for exceedance events. This information was provided, and no further objection was raised. The SuDS Consultee requested a condition confirmation SuDS measures have been fully implemented in accordance with agreed details prior to occupation.

9.9 Trees

9.9.1 Policy DMD 80 requires that all development and demolition must comply with established good practice, guidelines and legislation for the retention and protection of trees. Proposals must:

- a. Retain and protect trees of amenity and biodiversity value on the site and in adjacent sites that may be affected by the proposals;
- b. Ensure that the future long term health and amenity value of the trees is not harmed;
- c. Provide adequate separation between the built form and the trees including having regard to shading caused by trees and buildings.

9.9.2 An Arboricultural statement has been submitted for the 18 trees that are on the site. None of these are Category A trees. All Category B trees would be retained while 8 Category C trees would be removed. The Tree Officer has raised no objection to the loss of trees on site, given those being lost were Category C. Replacement planting is secured for these 8 trees. In order to ensure that the method outlined within the Arboricultural Impact Assessment is adhered to, a condition will be applied requiring sign off of tree works.

9.10 Biodiversity

9.10.1 Policy DMD79 requires developments resulting the creation of 100m² of floorspace or one net dwelling or more should provide on-site ecological enhancements having regard to feasibility and viability.

9.10.2 The applicant submitted an Ecology Report in support of the proposal. The findings of the report are as follows:

- *No protected species or evidence of protected species were found on site at the time of the survey.*
- *The site provides negligible potential for badger, Great Crested Newt (GCN) and reptiles due to the lack of suitable habitat and limited connectivity to more suitable habitats.*
- *The building provides moderate potential for roosting bats due to the hung tile to the rear dormer and gaps and access points throughout the building's roof.*
- *The introduced shrub and scattered trees habitats provide moderate potential for breeding birds.*

9.10.3 The Ecology Report also indicated that should any badgers, great crested newts or other reptiles are found during demolition/construction, works must stop and advice should be sought.

9.10.4 In terms of bats the report found that a bat emergence survey was required. This was undertaken and a report sent to the officer on 26.08.2022 which found no evidence of roosting bats at the subject property.

9.10.5 In terms of breeding birds, the report recommended no further surveys, however, did recommend the development should take place outside of nesting season and if this is not possible a qualified ecologist should be on site to ensure the building/vegetation is not occupied by breeding birds prior to demolition or site clearance. In the event

breeding birds are found, a buffer zone would be required until the nest is no longer in use.

9.10.6 The report also suggests mitigation measures and enhancements for the site (see table 14 of the Ecology Report). In order to ensure the advice within the report is followed a condition would be applied to the decision to require the applicant to submit to the LPA a written verification report from a qualified ecologist prior to occupation.

9.11 Energy and Water Efficiency

9.11.1 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 futures needs having regard to technical feasibility and economic viability. Policy DMD 51 states further energy efficiency standards and that all developments will be required to demonstrate how the proposal minimises energy related CO₂ emissions which must adhere to the principles of the energy hierarchy in the policy. This follows policy CP 20 of the Core Strategy which states that the Council will require all new developments, and where possible via retrofitting process in existing development to address the causes and impacts of climate change by: minimising energy use; supplying energy efficiently; and using energy generated from renewable sources in line with the London Plan and national policy. The adopted policies require that new developments achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability.

9.11.2 The applicant has submitted an Energy Statement which states that a 'Lean, Clean, Green' has been adopted and that the development achieves an overall improvement (DER/TER) in regulated emissions at over 63.31% above Part L 2013 standard. This is achieved through the adoption of passive design standards, insulation with heating and hot water to be provided via heat pump technology and roof mounted PV installations. The PV panels, as well as the external condensers for the heat pumps are shown on the roof plan and are not considered to be unacceptable in terms of design.

9.11.3 The Energy Statement also indicates water usage will be limited to 105litres per person per day in accordance with policy SI 5 of the London Plan.

9.12 Community Infrastructure Levy (CIL)

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

9.12.2 If the proposal was deemed acceptable, the development would be subject to both CIL rates above.

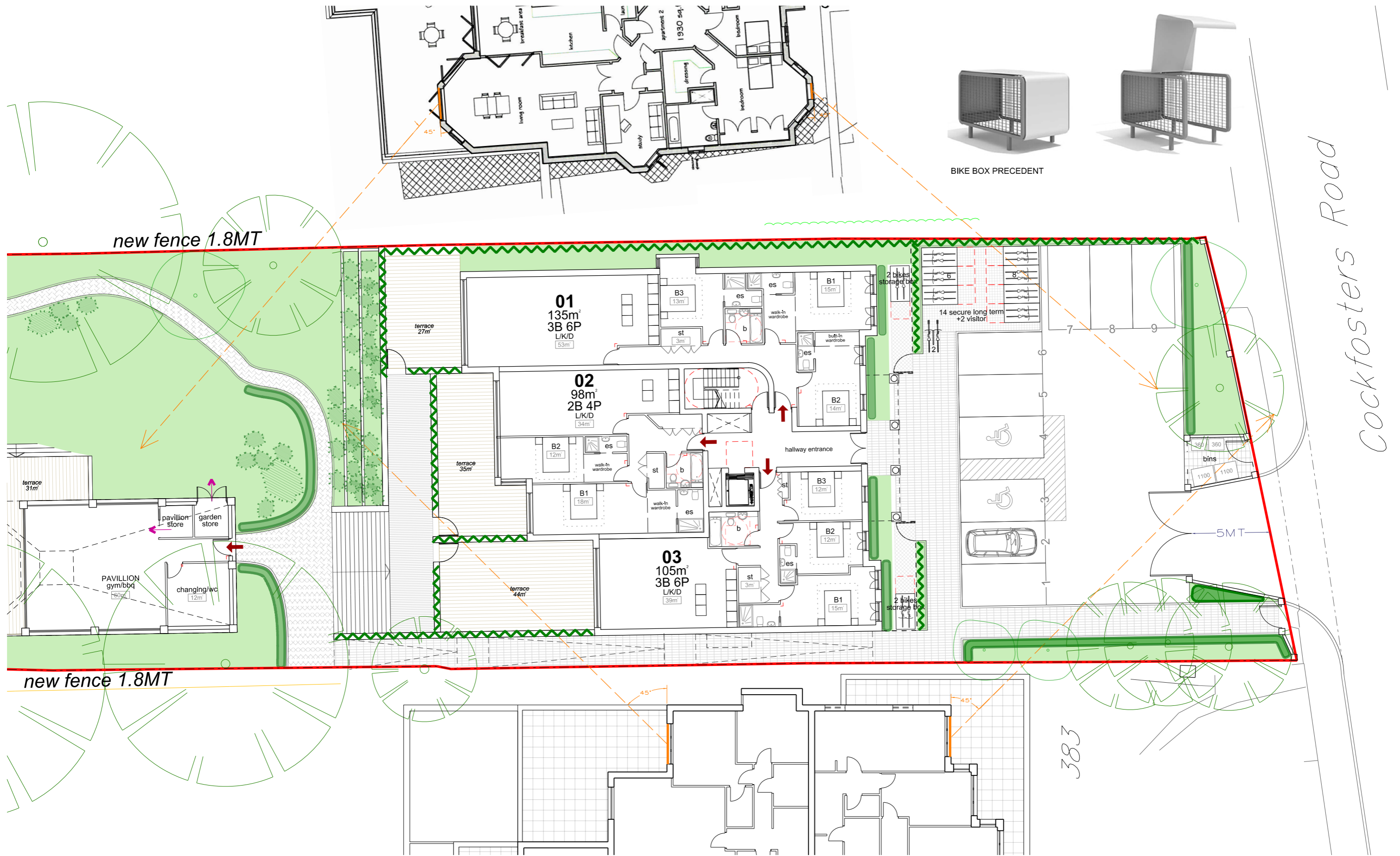
10 Public Sector Equalities Duty

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

11. Conclusion

- 11.1 The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF, and the application of the tilted balance means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, which also includes the Development Plan. Moreover, planning permission should be approved unless “the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”.
- 11.2 Having regard to the assessment in this report, the development would provide 9 units of residential accommodation including 5 family sized units, which it is considered, would be consistent with the thrust of national planning policy and the adopted “development plan” to optimise development on small sites. It would also and importantly, increase the delivery of new homes in response to the Housing delivery Test and the need to deliver new homes.
- 11.3 It is acknowledged that consideration of this proposal has involved some balanced judgements. It is considered however that the form, design and appearance of development, would not be dissimilar to other recent development and thus, is appropriate for the location and would sympathetically relate with the character and visual amenities of the surrounding area. In all other respects including parking, access, relationship to existing / retained trees etc, the proposed scheme is considered acceptable as outlined in the aforementioned report.
- 11.4 The above assessment against the development plan policies has produced the following conclusion:
- The proposal would provide 9 dwellings with a good standard of living accommodation that would contribute to the housing stock in the borough.
 - The proposed development is considered appropriate in form and design and would not result in detrimental harm to the character and appearance of the locality .
 - The proposal would not cause any unacceptable harm upon highway safety or the flow of traffic in the locality.
 - The proposal, by virtue of size, location and proximity would not harm the amenity of occupying and neighbouring residents.
 - The design and construction of the proposal would have appropriate regard to environmental sustainability issues including energy and water conservation, renewable energy generation, and efficient resource use, as ensured by the included conditions.
 - The proposal would retain and protect trees of amenity and biodiversity value.
 - The development would be appropriate and in accordance with relevant National and Regional Policy, Core Strategy and Development policies for the reasons noted above.

- 11.5 Having regard also to the mitigation secured by the recommended conditions and the presumption in favour of sustainable development it is considered that the benefits of the development would outweigh any identified impacts. When assessed against the suite of relevant planning policies it is considered that planning permission should be granted subject to conditions.



22/08/2022 rev A Pavilion reduced by 25% and general amendments

385 COCKFOSTERS ROAD

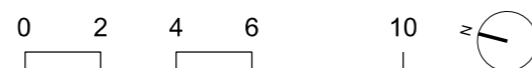
Proposed Ground Floor Plan

G M L Architects

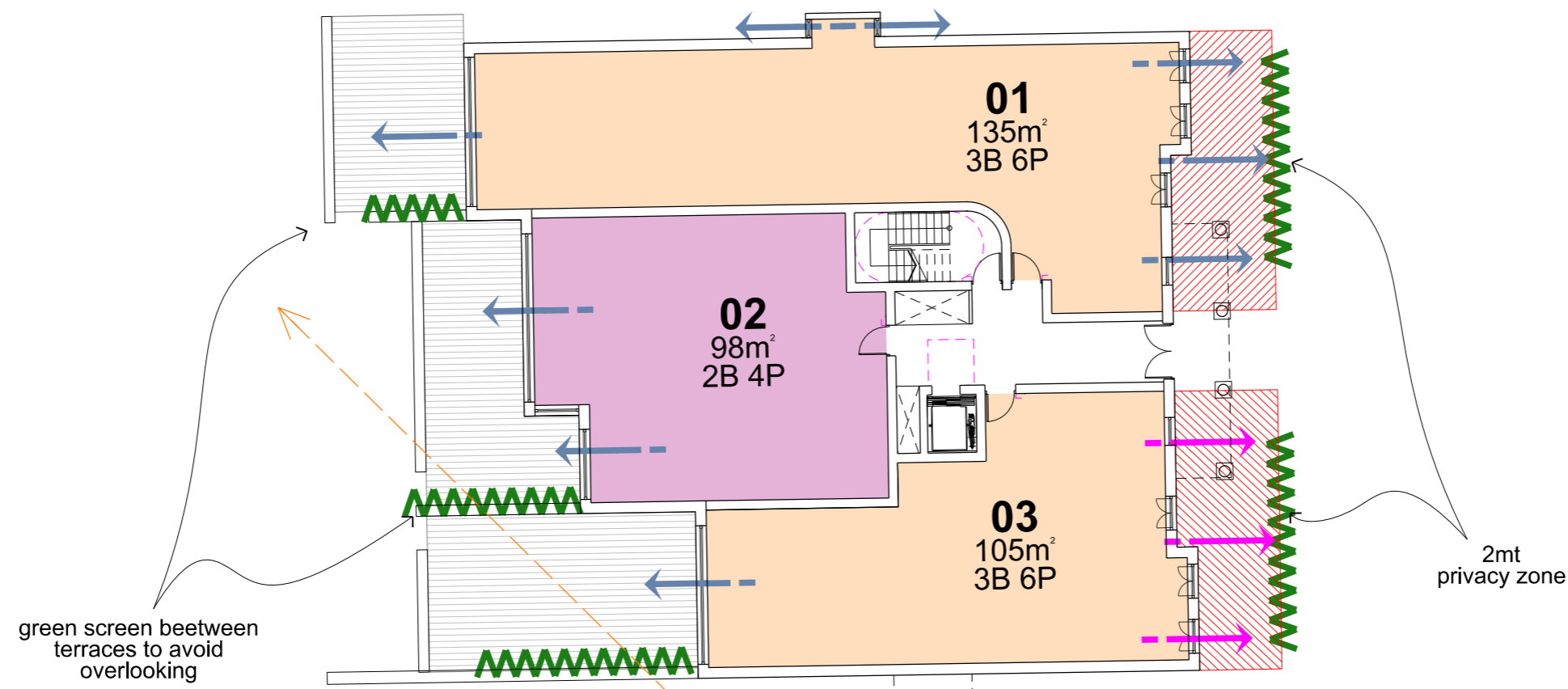
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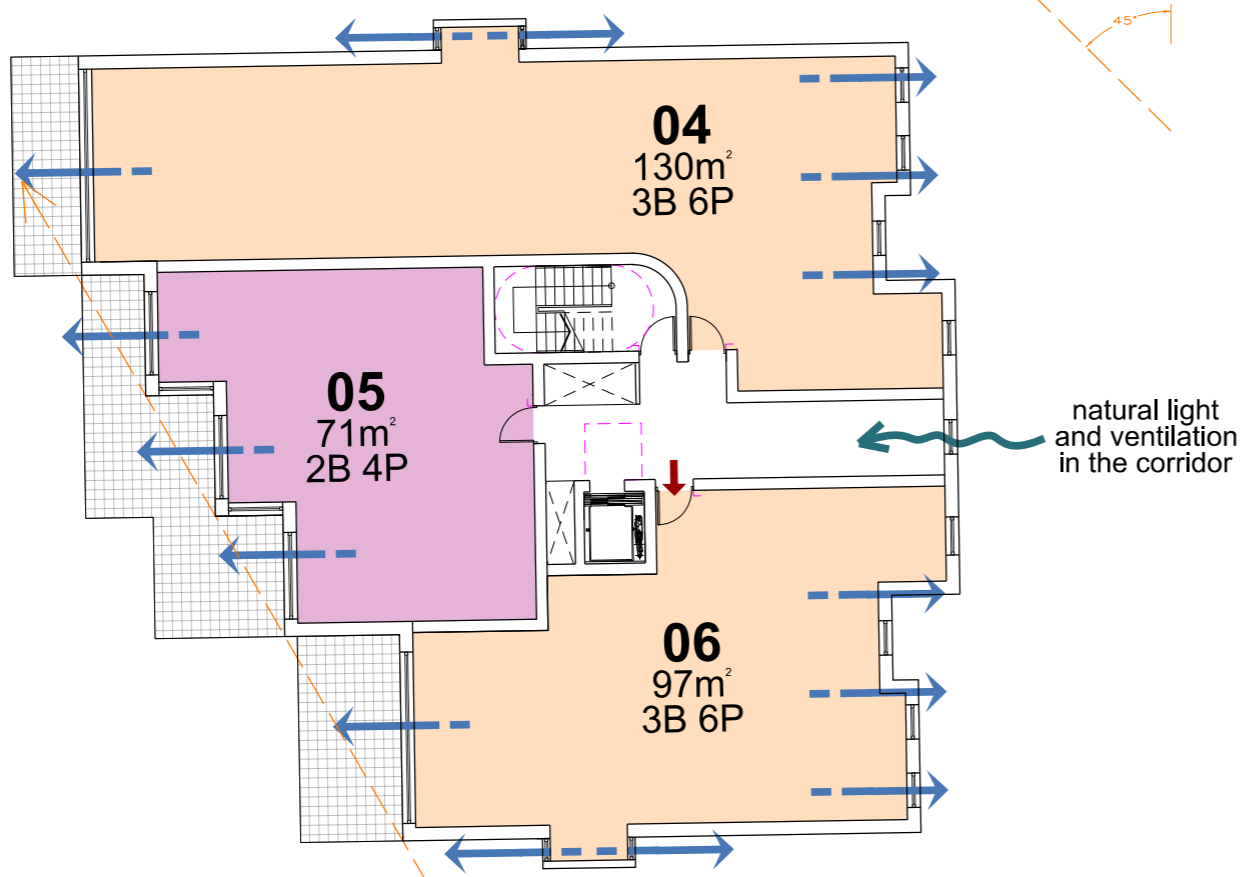


- 1B 2P
- 2B 3P
- 2B 4P
- 3B 5P
- 3B 6P

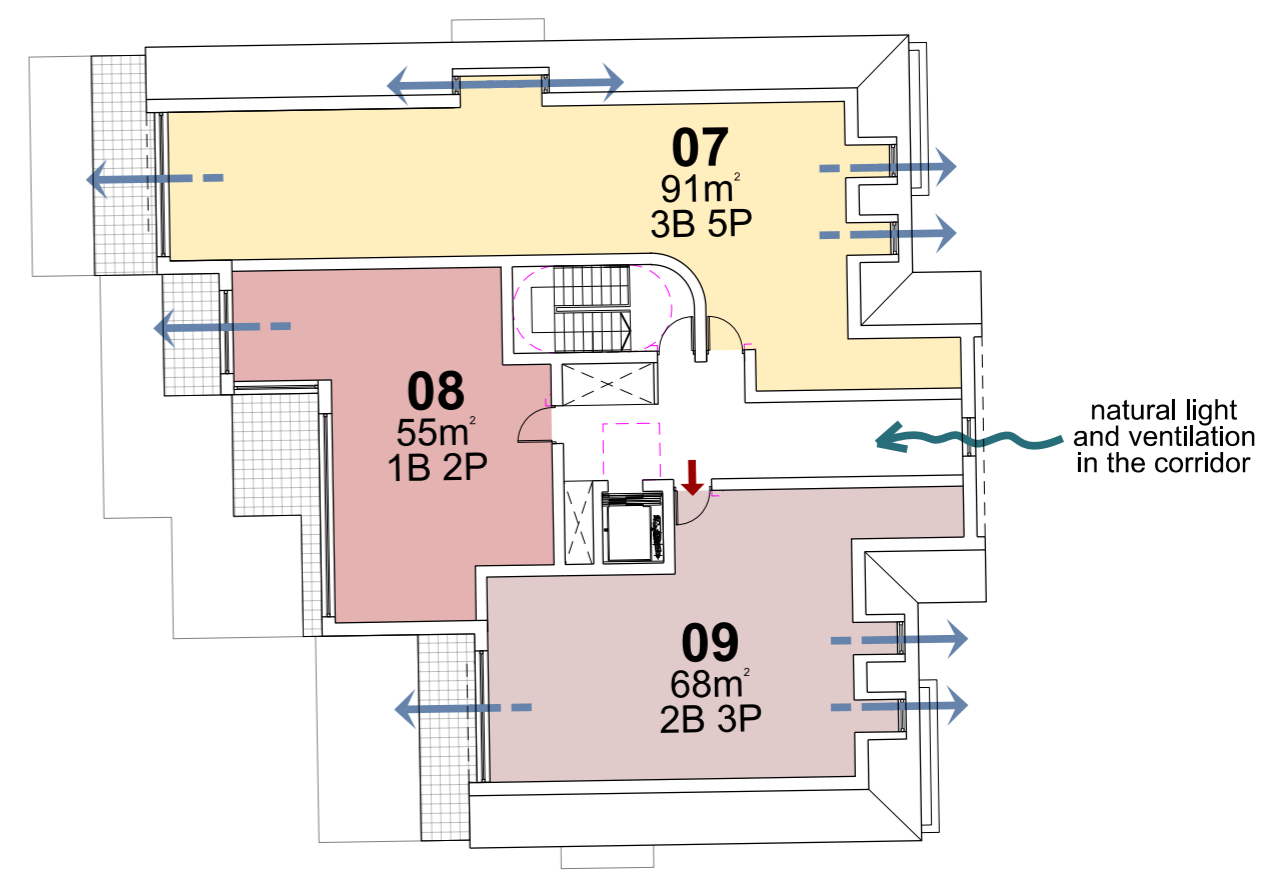


Ground Floor Plan

PROPOSED GF			
01	135m ²		3B 6P
02	98m ²		2B 4P
03	105m ²		3B 6P
PROPOSED FF			
04	130m ²		3B 6P
05	71m ²		2B 4P
06	97m ²		3B 6P
PROPOSED SF			
07	91m ²		3B 5P
08	55m ²		1B 2P
09	68m ²		2B 3P
TOT		850m²	42P



First Floor Plan



Second Floor Plan

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385 COCKFOSTERS ROAD

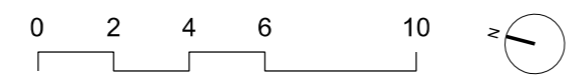
Proposed Plans

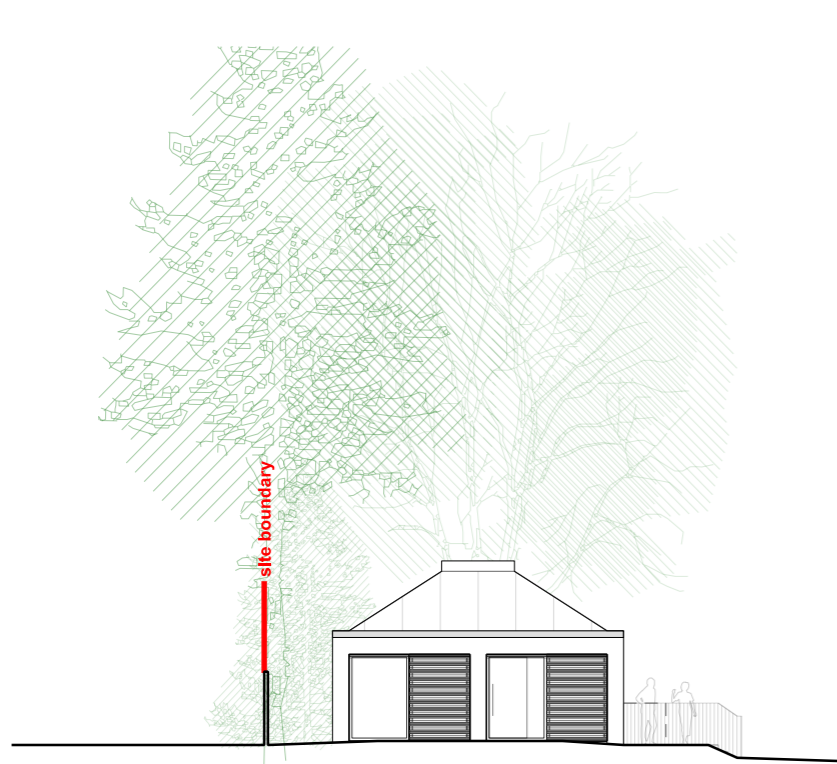
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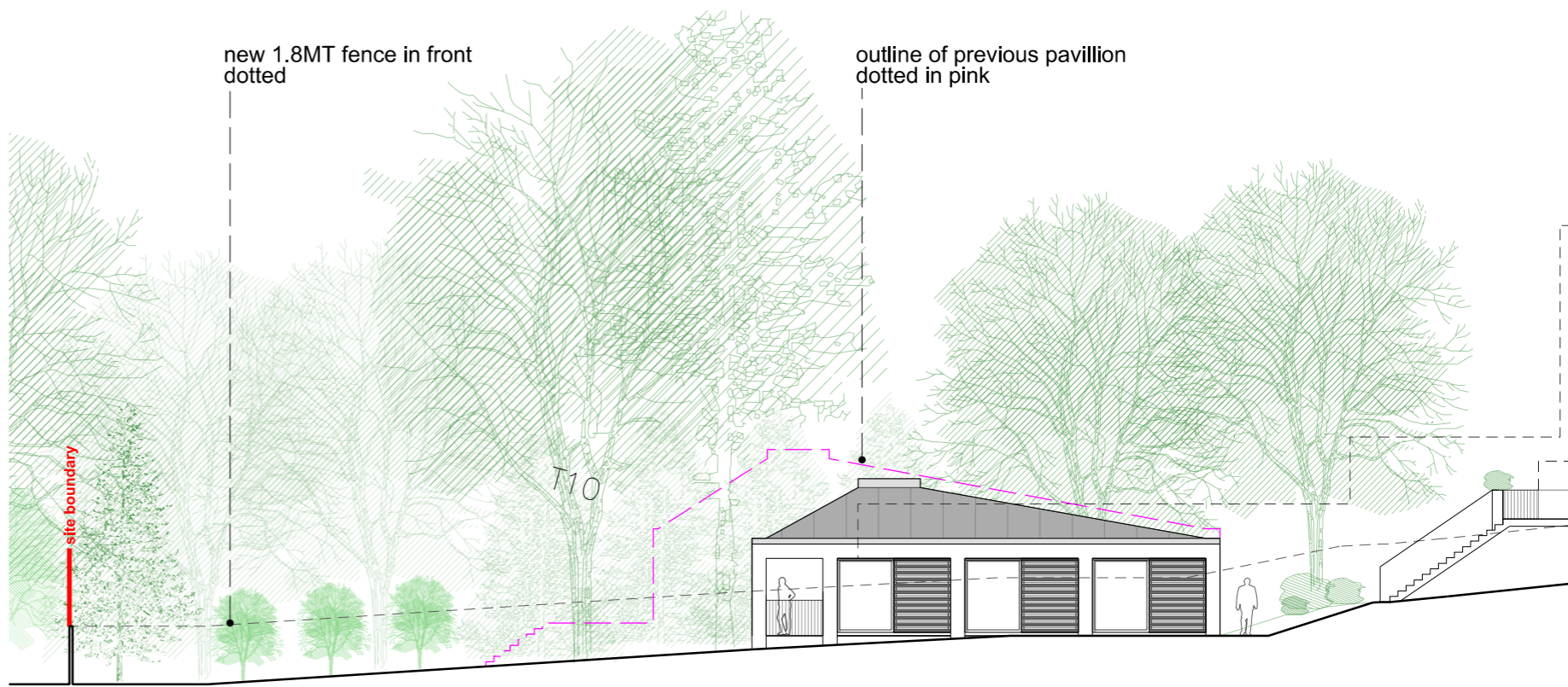
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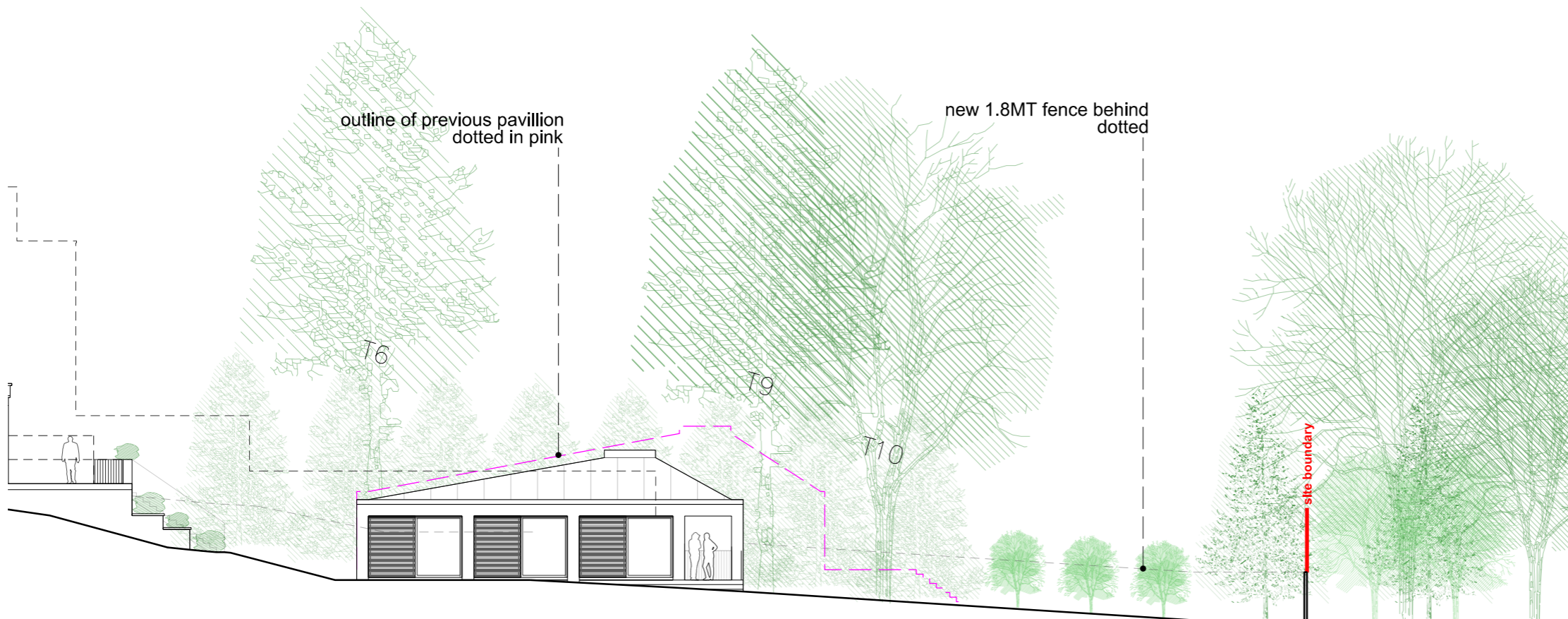




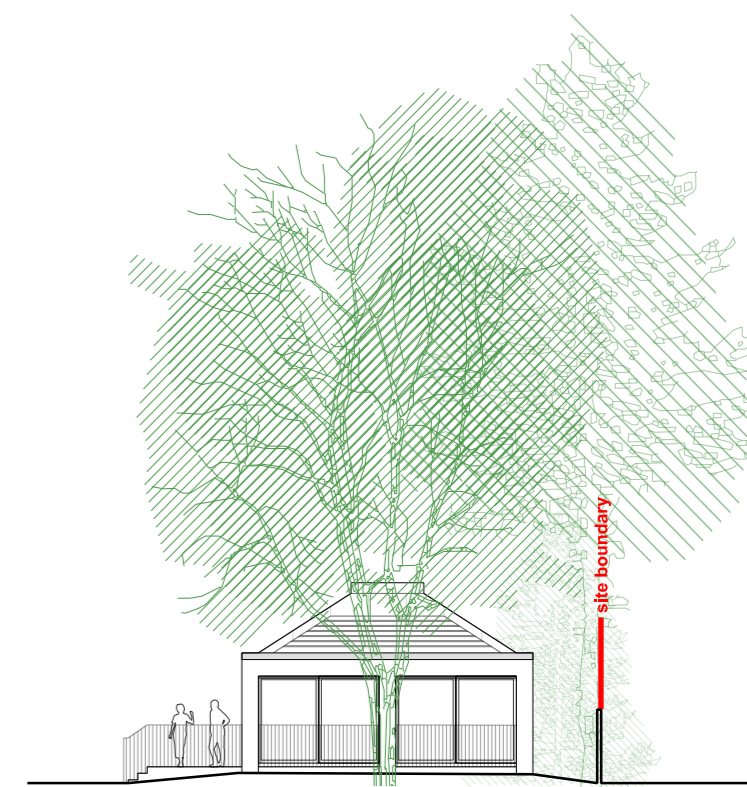
Proposed East Elevation



Proposed South Elevation



Proposed North Elevation



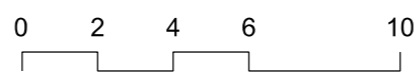
Proposed West Elevation

22/08/2022 rev A Pavilion reduced by 25% and general amendments

385 COCKFOSTERS ROAD
Proposed Pavillion Elevations

G M L Architects

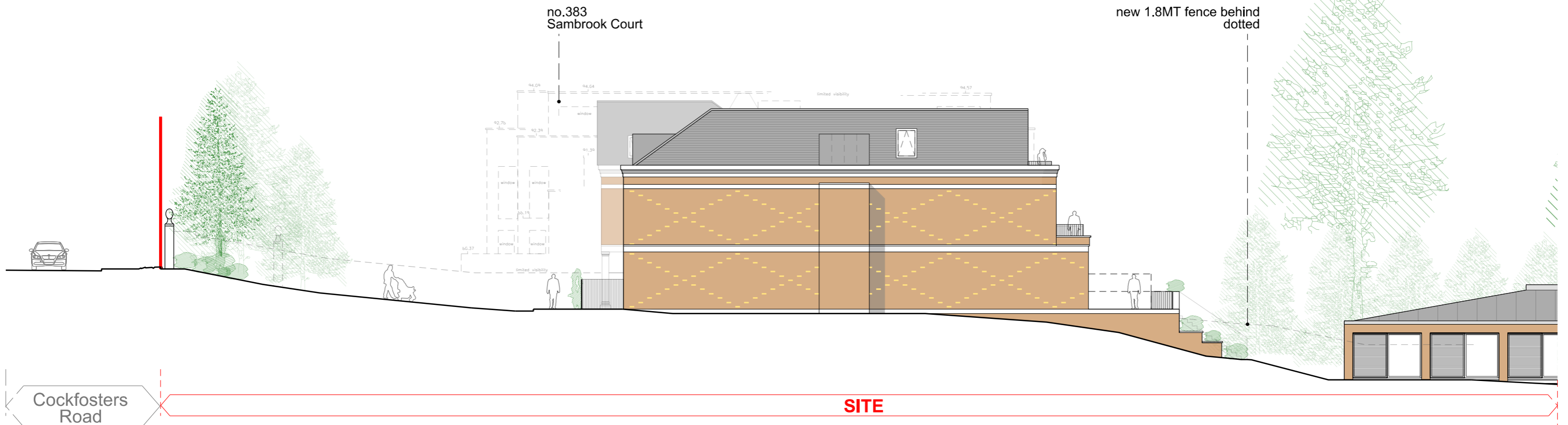
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Proposed Front Elevation
East Elevation



Proposed Side Elevation
North Elevation

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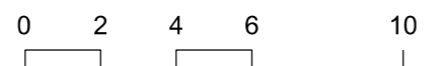
Proposed Elevations

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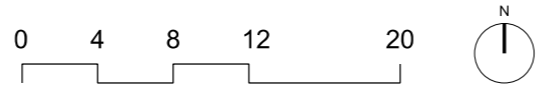




KEY

- TREE TO BE REMOVED
- PROPOSED TREE
- EXISTING TREE
- SCREENING PLANTER
- BORDER
- METAL FENCE
- SHRUB
- ACTIVE CHARGING POINT
- PASSIVE CHARGING POINT

EXISTING SEWER



385 COCKFOSTERS ROAD
Proposed Site Plan

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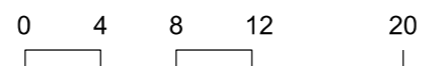
Proposed Street Elevation

G M L Architects

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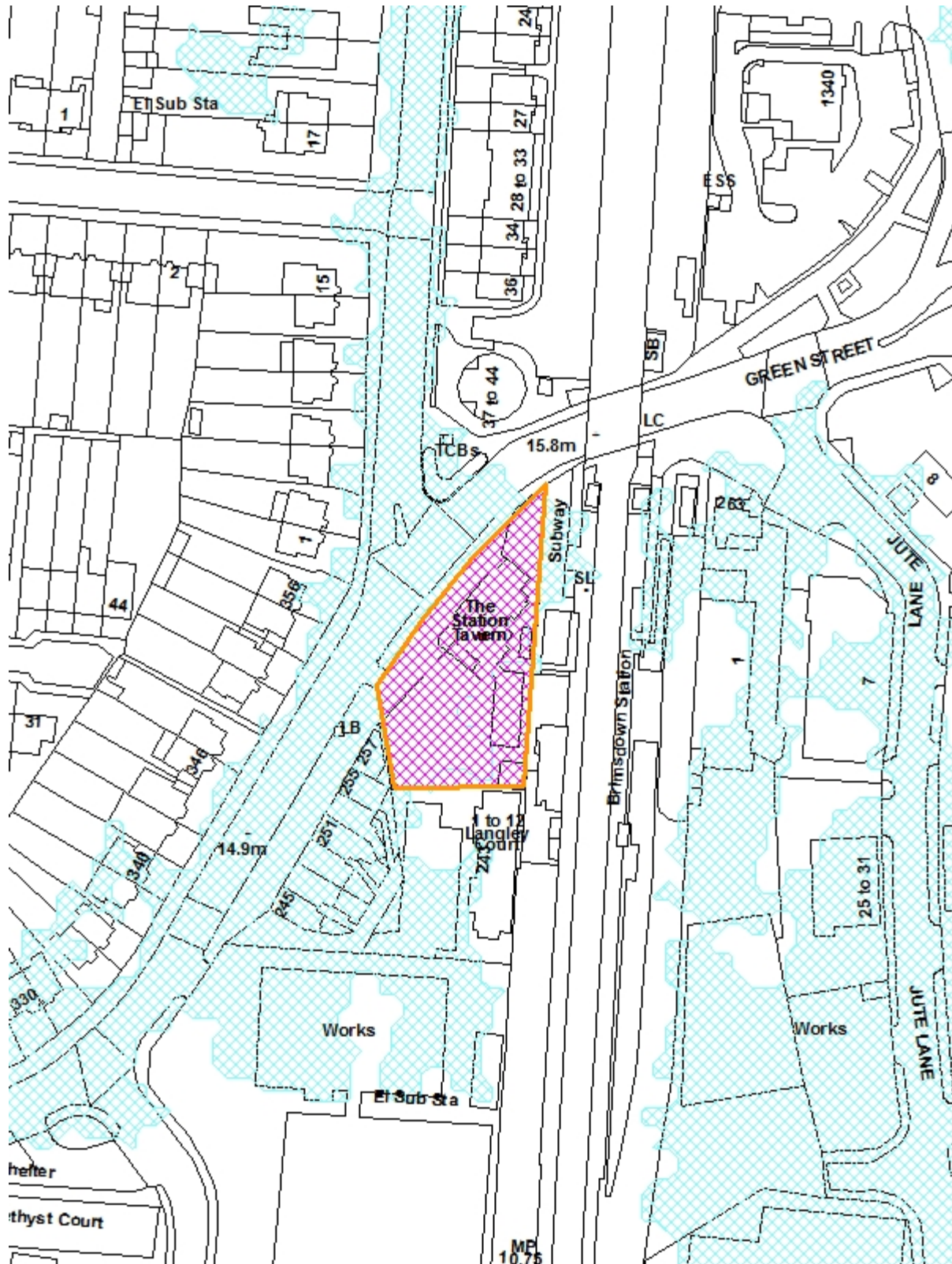
4374/PA/030A



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PLANNING COMMITTEE		Date: 18 October 2022
Report of Head of Planning Vincent Lacovara	Contact Officer: Gideon Whittingham Andy Higham	Ward: Enfield Highway
Ref: 21/01140/FUL		Category: Full Planning Application
LOCATION: Public House, Green Street, Enfield EN3 7SH		
PROPOSAL: Redevelopment of site to provide mixed use residential development involving erection of a 21 storey building with double basement comprising 100 self-contained (private and social residential units), in addition to commercial and retail areas on ground and mezzanine.		
Applicant Name & Address: Mr Tepe	Agent Name & Address: Mr Murat Aydemir Intelliarch Ltd 47 Eversley Park Road London N21 1JJ murat@i-arch.co.uk	
RECOMMENDATION:		
<ol style="list-style-type: none"> 1. That planning permission be REFUSED 2. That the Head of Development Management be granted delegated authority to agree the final wording of the reasons for refusal as indicated in the Recommendation section of the report. 		

Ref: 21/01140/FUL LOCATION: Public House, Green Street, Enfield, EN3 7SH



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Scale 1:1250

North



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 was reported to Planning Committee on 19th July 2022.
- 1.2 At the Planning Committee meeting of 19th July 2022, Members resolved to defer the application to enable additional information to be assessed and to allow time for further negotiations with the Applicant on the reasons for refusal identified with a view to exploring how they could be addressed.
- 1.3 Following Planning Committee on 19th July 2022, and in accordance with the resolution, officers contacted the Agents outlining the 12 reasons for refusal, the information required to overcome these refusals, a proactive offer for any meetings to discuss these matters and the date by which this information was required, namely 29th August 2022. This latter point was so that the report could undergo the necessary assessment and public consultation, prior to returning to Planning Committee on 18th October 2022 as requested.
- 1.4 Communications were therefore sent by officers to the applicant on the 26th July 2022, and in the absence of any response, a further email on 1st August 2022 and again on 5th August 2022.
- 1.5 In seeking to address the concerns raised in the officer's communications, information in respect of each reason for refusal was provided by the applicant on 29th August 2022.
- 1.6 Between the initial communication, namely 26th July 2022, and the date by which the information was required, namely 29th August 2022, there was no offer from the applicant to meet to enable a broader discussion on the merits of the proposals
- 1.7 In summary, the following in respect of each reason for refusal was provided, explained in more detail in section 3 below:

- Reasons for refusal 1: Loss of public house
 - Provided a Public House Viability Statement

- Reason for refusal 2: Location of offices
 - Provided a Sequential Test Report

- Reason for refusal 3: Building/overdevelopment:
 - No change building form/site arrangement/ detailed design – however additional justification to unchanged proposal was provided

- Reason for refusal 4: Size, scale, massing of building
 - No change building form/site arrangement/ detailed design – however additional justification to unchanged proposal was provided

- Reason for refusal 5: Car park and servicing areas, transport issues
 - Provided a revised Transport Statement including revised layout and associated facilities

- Reason for refusal 6: Impact on amenity of Langley Court
 - No change building form – however additional boundary treatment proposed

- Reason for refusal 7: Impact on amenity of future residents
 - No change building form/site arrangement/ detailed design – however intention of restricted access provided

- Reason for refusal 8: SuDS / FRA
 - Provided a revised Flood Risk Assessment and Drainage Strategy Statement

- Reason for refusal 9: Financial contributions
 - Provided a Financial Viability Assessment

- Reason for refusal 10: Fire strategy
 - Provided a Fire Statement

- Reason for refusal 11: Inclusive design statement
 - No change building form/site arrangement/ detailed design – however additional Design Statement provided

 - Reason for refusal 12: Children’s play space
 - Provided revised play area plans
- 1.8 This addendum report on the proposed development has been updated to reflect the assessment of the additional information and updates to be further assessed.

2. RECOMMENDATION:

- 2.1 The Head of Development Management be authorised to **REFUSE** planning permission for the following (updated) reasons:

1. No adequate case has been demonstrated to justify the loss of the existing public house, that there is no demand for the existing public house use on the site, that there is no demand for any alternative community use in the premises, nor that a suitable replacement would be provided within the scheme. As such, it would be contrary to Policy HC7 of the London Plan (2021) and Policy DMD17 of the Enfield Development Management Document (2014).

2. The proposal seeks to provide office use in a location that is not a preferred office location without applying the sequential test. As such, it would be contrary to Policy DMD25 of the Enfield Development Management Document (2014).

3. The proposed development by reason of its high density, together with its unsympathetic architectural approach, bulk, scale, mass and design, would result in the introduction of an overly intensive building that would constitute the gross overdevelopment of the site. The building would bear no relation to the scale, character and appearance of the locality and would fail to integrate satisfactorily with its surroundings. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policies D3 and D4 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010) and DMD6, DMD8, DMD10, DMD37 and DMD38 of the Enfield Development Management Document (2014).

4. The proposed building, by reason of its excessive height, mass and bulk constitutes an excessively tall and inelegant building that has not been justified in this locational context in its visual, functional, environmental and cumulative impacts. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policies D3, D4 and D6 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010) and DMD6, DMD8, DMD10, DMD37 and DMD38 of the Enfield Development Management Document (2014).

5. The proposed development, due to the design of the car park and servicing areas, including the under provision of parking spaces, some parking spaces being inaccessible and the dependence upon a car lift for basement access, together with the intensity and combination of uses, would result in the generation of significant additional traffic and parking pressures on the local and strategic road network such as access points conflicting with vehicles queueing in Green Street and vehicle conflicts in the servicing area with potentially high numbers of delivery vehicles, in an area without a controlled parking zone, adding to existing traffic and parking capacity issues without adequate proposals for mitigation. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policy T6 of the London Plan (2021) Policy CP23, CP24 and CP30 of the Enfield Core Strategy (2010) and Policy DMD45, DMD47 and DMD48 of the Enfield Development Management Document (2014).

6. The proposed development, due to the form, scale, massing and close proximity to the neighbouring 3 storey residential block at Langley Court, 243 Green Street, would result in an overbearing impact that would give rise to an excessive unneighbourly sense of enclosure, as perceived from neighbouring properties including Langley Court. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policies D4 and D6 of the London Plan (2021), Policies CP4 and CP30 of the Enfield Core Strategy (2010)

and Policies DMD8, DMD10, and DMD43 of the Enfield Development Management Document (2014).

7. The proposed development due to the inadequate design of the communal amenity spaces on floors 1, 6 and 11 would give rise to high levels of inter-visibility, and potentially access between users of that amenity space and the residents with flats that abut those spaces, resulting in poor security, a lack of privacy and a poor quality living environment for future residents. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policy D6 of the London Plan (2021), Policy CP30 of the Core Strategy (2010), 3.5, 3.6 of the London Plan (2015), the London Housing SPG and Policy DMD 8 and DMD 9 of the Enfield Development Management Document (2014).

8. The proposed development is not accompanied by an adequately comprehensive sustainable drainage strategy that would clarify how the development shall meet Greenfield Runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) events and utilise Sustainable Urban Drainage Systems(SuDS) in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management. As such the proposal fails to accord with Policies SI12 and SI13 of the London Plan (2021), Policy CP21 and CP28 of the Enfield Core Strategy (2010) and Policy DMD61 of the Enfield Development Management Document (2014).

9. In the absence of a legal agreement to secure policy compliant financial and nonfinancial contributions including for affordable housing, health care, employment, skills, training and enterprise, transport matters, public realm improvements and carbon offsetting contribution, the development fails to mitigate its impact on local services, amenities, infrastructure and environment. This is contrary to the requirement of policy DF1 of the London Plan, Policy CP46 of the Enfield Core Strategy (2010) and the Enfield Section 106 Supplementary Planning Document (2016)

10. In the absence of an adequate Fire Strategy, the application is contrary to Policy D12 of the London Plan (2021).
 11. In the absence of an adequate inclusive design statement that demonstrates how the proposals will deliver an inclusive environment, the application is contrary to Policies D3 and D5 of London Plan (2021), Policy DMD37 and DMD39 of the Enfield Development Management Document (2014) and the Accessible London SPG.
 12. The proposal is deficient in the provision of on-site children's play space required for the likely child yield of the development contrary to Policy S4 of the London Plan (2021)
- 2.2 That the Head of Development Management be granted delegated authority to agree the final wording of the reasons for refusal to cover the matters in the Recommendation section of this report.

3. CONSULTATION

Public Response

- 3.1 The Council re-notified some 768 local addresses in respect of the planning application by letter dated 16th September 2022. The development was also advertised in the Enfield Independent on 14th September 2022.
- 3.2 At the time of writing the report the revised application had received 36 contributors, 8 in support and 28 in objection.
- 3.3 The objectors' concerns are summarised below:
 - Development too high
 - Inadequate parking provision
 - Inadequate access
 - Inadequate parking provision
 - Inadequate public transport provisions
 - Information missing from plans
 - Loss of light
 - Loss of parking

- Loss of privacy
- More open space needed on development
- Noise nuisance
- Not enough info given on application
- Out of keeping with character of area
- Over development
- Strain on existing community facilities
- Affect local ecology
- Conflict with local plan
- Development too high
- General dislike of proposal
- Increase in traffic
- Increase of pollution
- Inadequate consultation.

3.4 Comments from the letters of support are summarised below:

- Contributes positively to surroundings
- I work in the area and have seen massive progress in areas around such as Tottenham Hail and it looks amazing and Brimsdown needs to keep up with the times. it would be amazing to see the area get some much needed TLC. i support the scheme whole heartedly and wish to see it be accepted.
- I would be happy to see new shops and housing in the area i work in Brimsdown very long time. very good to see better area
- Have my business in Brimsdown for the past 8 years and i strongly believe this area need to see an update thats pub has been closed and an eyesore since i can remember maybe we can finally have some new commercial units for shops such as costa coffee to move into such as Hertford Road.
- Appropriate scale, height, massing
- High quality design

Officer response to comments

3.5 The material planning concerns within the letters of response have been taken into account by officers during the consideration of the planning application. Matters relating to the many impacts of the excessive scale, height and mass of the proposal have been of concern for officers.

- 3.6 Transport concerns have been raised by many objectors during the consultation period. The relevant transport section of the report provides the position with regard to on-site parking and wider transport implications against adopted policy.
- 3.7 It is acknowledged that the site has the potential to accommodate a significant redevelopment that could provide much needed housing, including affordable housing. Regrettably, despite this potential, the provision of affordable housing within this scheme has been demonstrated as unviable, as has the scheme coming forward as solely market housing been demonstrated as unviable.
- 3.8 The many shortcomings of this application are considered to outweigh the public benefits of delivering new residential accommodation and despite having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, the application is not considered acceptable and accordingly is recommended for refusal.

Statutory and Non-Statutory Consultees:

Internal Consultations:

- 3.9 Traffic & Transportation – Objects. Serious concerns regarding several aspects of the proposal. Comments are incorporated in the body of the report
- 3.10 Sustainable Drainage – Objects. Serious concerns regarding several aspects of the proposal. Comments are incorporated in the body of the report
- 3.11 Design – Objects. Serious concerns regarding several aspects of the proposal. Comments are incorporated in the body of the report
- 3.12 Planning Policy – Objects. Serious concerns regarding several aspects of the proposal. Comments are incorporated in the body of the report
- 3.13 Section 106 – Comment provided in respect financial and nonfinancial contributions applicable for a scheme of this nature
- 3.14 Environmental Health – No additional comment provided
- 3.15 Refuse/Waste – No additional comment provided

- 3.16 Energy – No additional comment provided
- 3.17 BNP Paribas - Comments are incorporated in the body of the report
- 3.18 External Consultees
- 3.19 Environment Agency – No additional comment provided
- 3.20 Met Police – No additional comment provided
- 3.21 Network Rail – No comment
- 3.22 NHS – No additional comment provided
- 3.23 GLA – No additional comment provided

4. ASSESSMENT

- 4.1 In light of the above, the predominant focus of this addendum assessment will be on matters which have changed significantly since those reported to Planning Committee on 19th July 2022. The report for Planning Committee on 19th July 2022 provides an overview of the consideration of issues which have not changed in the intervening period, although such matters will also be noted in this report.
- 4.2 **Reasons for refusal 1:- Loss of public house**
- 4.3 *No case has been demonstrated to justify the loss of the existing public house, that there is no demand for the existing public house use on the site, that there is no demand for any alternative community use in the premises, nor that a suitable replacement would be provided within the scheme. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policy HC7 of the London Plan (2021) and policy CL6 and SC2 of the Draft Enfield Local plan (2021)*

- Revised information: Provided a Public House Viability Statement and supporting details
 - Report for Planning Committee on 19th July 2022: Loss of a public house cited at paragraphs 9.4 – 9.9
- 4.4 Policy DMD17 in the adopted Enfield Development Management Document states that the Council will protect existing community facilities in the borough unless a suitable replacement is provided or there is no demand for the existing use or any alternative community use.
- 4.5 Text supporting Policy DMD17 (3.1.1) states that ‘In some areas of the borough where community service provision is already low this may include public houses.’ DMD17 could be relevant if the case officer is satisfied that community service provision in the area is low.
- 4.6 DMD17 indicates that:
Proposals involving the loss of community facilities will not be permitted unless:
- a. A suitable replacement facility is provided to cater for the local community that maintains the same level of public provision and accessibility; or
 - b. Evidence is submitted to demonstrate that there is no demand for the existing use or any alternative community use.
- 4.7 The development presented to Planning Committee on 19th July 2022 did not include information to justify the loss of the existing public house use, did not propose any suitable replacement nor did it demonstrate that there is no demand for the existing use or any alternative community use of the premises in the area.
- 4.8 In seeking to address this matter, the applicant provided a Public House Viability Statement, prepared by Discover Residential Ltd, along with a letter from Hawkes Property Group.

- 4.9 In terms of meeting criterion A of DMD17, the applicant states ‘In fact, as part of this scheme two new panoramic restaurants and two new pubs/bars establishments will be implemented.’ However, the application form (section 13) indicates that the entirety of drinking establishment use is proposed to be lost without replacement. In addition, the committee report also indicates that the proposals entail the provision of two restaurants, with no proposals for new/replacement public house floorspace. This is borne out in the submitted drawings. On this basis it is considered that no suitable replacement facility is proposed.
- 4.10 In terms of meeting criterion B of DMD17: Appendix 13 of DMD sets out requirements for demand assessment. Whilst this guidance is focused on employment and retail premises, it provides a clear indication as to the information/analysis required for such appraisals. The material put forward by the applicant consists of a single email (dated 13th August 2022) from Discover Residential Ltd which refers to a 2+ years marketing period, alongside a letter (dated 22nd August 2022) from Hawkes Property Group which does not specify the marketing period. Whilst the associated CAMRA (Campaign for Real Ale) Public House Viability [self] Test provided by the applicant also states the site has been marketed for 2 years, it also presents incongruous information stating the site has however been vacant for 6 years.
- 4.11 London Plan (2021) Policy HC7 “Protecting public houses” aims to protect pubs that have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. The following text provides a guide for assessing the value of the pub.

“When assessing whether a pub has heritage, cultural, economic or social value, boroughs should take into consideration a broad range of characteristics, including whether the pub:

- a. is in a Conservation Area*
- b. is a locally- or statutorily-listed building*

- c. *has a licence for entertainment, events, film, performances, music or sport*
- d. *operates or is closely associated with a sports club or team*
- e. *has rooms or areas for hire*
- f. *is making a positive contribution to the night-time economy*
- g. *is making a positive contribution to the local community*
- h. *is catering for one or more specific group or community.”*

- 4.12 Para 7.7.7 of the London Plan (2021) stipulates that “to demonstrate authoritative marketing evidence that there is no realistic prospect of a building being used as a pub in the foreseeable future, boroughs should require proof that all reasonable measures have been taken to market the pub to other potential operators. The pub should have been marketed as a pub for at least 24 months at an agreed price following an independent valuation, and in a condition that allows the property to continue functioning as a pub. The business should have been offered for sale locally and London-wide in appropriate publications and through relevant specialised agents” in order to rule out demand for its existing use or any alternative community use.
- 4.13 The submission of a single letter and single email are considered unlikely to constitute the ‘authoritative marketing evidence’ required by the London Plan. In this case the applicant has failed to adequately justify the loss of the existing public house use, demonstrate that a suitable replacement is proposed, nor demonstrate that there is no demand for the existing use or any alternative community use of the premises in the area and therefore the scheme cannot be supported on these terms.
- 4.14 Upon revision, CAMRA were consulted, and any comment provided shall be reported at the meeting.
- 4.15 To fully encapsulate the revised information, the reason for refusal requires the following amendment:

4.16 No adequate case has been demonstrated to justify the loss of the existing public house, that there is no demand for the existing public house use on the site, that there is no demand for any alternative community use in the premises, nor that a suitable replacement would be provided within the scheme. As such, it would be contrary to Policy HC7 of the London Plan (2021) and Policy DMD17 of the Enfield Development Management Document (2014).

4.17 **Reason for refusal 2: Location of offices**

4.18 *The proposal seeks to provide office use in a location that is not a preferred office location without applying the sequential test. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policy DMD25 of the Enfield Development Management Document (2014).*

- Revised information: Provided a Sequential Test Report
- Report for Planning Committee on 19th July 2022: Office (B1 use) Development cited at paragraph 9.10

4.19 With respect to office development in this location Policy DMD25 of the adopted Development Management Policies (2014) permits major development being permitted in Enfield Town and the district centres, otherwise the sequential test is applied.

4.20 The development presented to Planning Committee on 19th July 2022 did not include a sequential test.

4.21 In seeking to address this matter, the applicant provided a Sequential Test Report, prepared by Gilmartin Ley Surveyors.

4.22 The bulk of the report comprises a description of the proposed office accommodation, summaries of various planning policies, and a general commentary on the office market in Enfield. Only the second table in the report (titled 'Office developments in the borough / search for possible alternatives') presents an analysis of potential office accommodation.

4.23 The report is not structured according to the requirements of policy, contains much extraneous information, and discussion of 'competitor' locations which are not relevant to the sequential assessment. Whilst NPPF paragraph 88 states that 'Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored', the sequential assessment, as a minimum, needs to assess potentially suitable sites in Enfield Town, Angel Edmonton, Edmonton Green, Southgate, and Palmers Green, and if no suitable sites are found, then move to assessing edge of centre sites. In the absence of such satisfactory information, the scheme cannot be supported on these terms.

4.24 To fully encapsulate the revised information, the reason for refusal requires the following amendment:

The proposal seeks to provide office use in an inappropriate location without applying the sequential test. As such, it would be contrary to Policy DMD25 of the Enfield Development Management Document (2014).

4.25 **Reason for refusal 3: Building/overdevelopment**

4.26 The proposed development by reason of its high density, together with its unsympathetic architectural approach, bulk, scale, mass and design, would result in the introduction of an overly intensive building that would constitute the gross overdevelopment of the site. The building would bear no relation to the scale, character and appearance of the locality and would fail to integrate satisfactorily with its surroundings. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted

balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policies D3 and D4 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010) and DMD6, DMD8, DMD10, DMD37 and DMD38 of the Enfield Development Management Document (2014).

- Revised information in respect of Reasons for Refusal 3 & 4: No change building form/site arrangement/ detailed design – however additional justification to unchanged proposal was provided (see below)

4.27 Reason for refusal 4: Size, scale, massing of building

4.28 The proposed building, by reason of its excessive height, mass and bulk constitutes an excessively tall and inelegant building that has not been justified in this locational context in its visual, functional, environmental and cumulative impacts. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policies D3, D4 and D6 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010) and DMD6, DMD8, DMD10, DMD37 and DMD38 of the Enfield Development Management Document(2014).

- Revised information in respect of Reasons for Refusal 3 & 4: No change building form/site arrangement/ detailed design – however additional justification to unchanged proposal was provided
- Report for Planning Committee on 19th July 2022 in respect of Reasons for Refusal 3 & 4: Development design and character cited at paragraph 9.24 -9.53

4.29 The development presented to Planning Committee on 19th July 2022 was considered not only out of context within the area, but also of poor design, as per the above reasons for refusal Nos.3 & 4.

- 4.30 The proposed tower has been designed to maximise the development of the site without due consideration to surrounding properties. There is generally no recognisable transition or positive relationship between the scale of the proposed building and that of the more modest neighbouring buildings in its surroundings.
- 4.31 The applicant failed to justify the placement of this tall building in this locational context by the use of massing studies or townscape/verified view assessment. As such, the scale, bulk and mass demonstrated in this proposal bears no relation to the surrounding context that will have a dramatic visual impact that would be detrimental to the neighbouring properties and general wider locality. The proposal therefore represents a gross overdevelopment of the site that could not be supported.
- 4.32 Whilst a contemporary design approach is supported in principle, the design of the proposed building does not acknowledge the design of surrounding buildings, resulting in an out of context and poorly designed scheme. Furthermore, the choice of materials bears no resemblance to the surrounding character and should relate better to the buildings established on Green Street, rather than the industrial area.
- 4.33 In seeking to address this matter, within a supporting summary document, the applicant provides justification for not only the placement of this tall building, but also its scale, form, massing and detailed design. It must be noted however that no substantive changes are proposed to the proposal in these aspects, save for those relating to other reasons for refusal, but rather a justification for these design choices.
- 4.34 In review, the Council's urban design officers sustain an objection.
- 4.35 Fundamental matters have failed to be accounted for, particularly its immediate context, in addition to utilising a design-led approach which would avoid the many tell-tale symptoms of overdevelopment in this case and the need for additional mitigation measures to either secure the quality of the environment, its occupants

and neighbours, or, where these fail, the development simply results in their detriment or low quality.

- 4.36 In addition, the robust Enfield Place and Design Quality Panel (EPDQP) report produced prior to submission remains wholly unaccounted within this application and again within the revised documents, particularly given that no substantive changes have been proposed and as such not considered to be acceptable.
- 4.37 To fully encapsulate the revised information, reasons for refusal 3 & 4 require the following amendment:
- 4.38 *Reasons for Refusal 3: The proposed development by reason of its high density, together with its unsympathetic architectural approach, bulk, scale, mass and design, would result in the introduction of an overly intensive building that would constitute the gross overdevelopment of the site. The building would bear no relation to the scale, character and appearance of the locality and would fail to integrate satisfactorily with its surroundings. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policies D3 and D4 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010) and DMD6, DMD8, DMD10, DMD37 and DMD38 of the Enfield Development Management Document (2014).*
- 4.39 *Reasons for Refusal 4: The proposed building, by reason of its excessive height, mass and bulk constitutes an excessively tall and inelegant building that has not been justified in this locational context in its visual, functional, environmental and cumulative impacts. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policies D3, D4 and D6 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010) and DMD6, DMD8, DMD10, DMD37 and DMD38 of the Enfield Development Management Document (2014).*

4.40 Reason for refusal 5: Car park and servicing areas, transport issues

4.41 *The proposed development, due to the design of the car park and servicing areas, including the under provision of parking spaces, some parking spaces being inaccessible and the dependence upon a car lift for basement access, together with the intensity and combination of uses, would result in the generation of significant additional traffic and parking pressures on the local and strategic road network such as access points conflicting with vehicles queueing in Green Street and vehicle conflicts in the servicing area with potentially high numbers of delivery vehicles, in an area without a controlled parking zone, adding to existing traffic and parking capacity issues without adequate proposals for mitigation. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policy T6 of the London Plan (2021) Policy CP23, CP24 and CP30 of the Enfield Core Strategy (2010) and Policy DMD45, DMD47 and DMD48 of the Enfield Development Management Document (2014).*

- Revised information: Provided a revised Transport Statement including revised layout and associated facilities
- Report for Planning Committee on 19th July 2022: Highway and transport implications cited at paragraphs 9.95 – 9.113

4.42 In respect of vehicle parking, the thirty-eight (38) car spaces proposed for the 100 residential units, considering the proposed dwelling mix, is well below the maximum standard of 117 and it is considered that the provision of only 38 spaces would not be acceptable.

4.43 In respect of commercial parking, the commercial units would also generate a parking demand, the estimated parking requirement for the proposed commercial

uses (Class E) is 32 spaces. It is considered that the parking provision of four spaces for the proposed commercial uses is insufficient.

- 4.44 In respect of vehicle parking layout and access, transport officers express concerns that there is only space for one-way movement within the car park, and the lack of waiting bays could cause problems for vehicles accessing and exiting at the car park.
- 4.45 The provision of a car lift is also a concern; in that it could potentially break down and result in no alternative parking apart from on street parking. Car lifts are generally unsupported in development schemes in the borough in line with policy DMD45 which also requires that turntables and car stackers are designed out.
- 4.46 The proposal also includes 4 short-stay spaces at ground floor level, accessed through a new crossover next to the existing level crossing. Transport officers have concerns with regard to the access to those four spaces, as in this location, there could be issues with queues from the level crossing obstructing the access. These concerns were shared by Network Rail.
- 4.47 In respect of servicing, the proposed development provides a service area off street, accessed from the shared access to the basement parking. The shared access between the service yard and the access to the car park and car-lift is conflicting and could cause problems and potentially affect the traffic flow. The vehicle movement associated to the residential parking, conflicts with delivery/service vehicles. The total number of service and delivery vehicles could be problematic, as there are the Class E units plus the high number of car free units, therefore more deliveries, all competing for the space.
- 4.48 In respect of cycle parking, the provision of 324 spaces would well exceed the policy requirement, however, it is noted that none of the proposed cycle spaces are secure and as such do not comply with the policy requirement. Further, the basement location of the cycle storage is neither convenient for future occupiers/users, nor accessible and as such not considered to be acceptable.

4.49 In seeking to address this matter, the revised Transport Statement including revised layout and associated facilities indicated the following changes:

- The omission of 4 off street car parking (commercial) spaces at ground floor level – replaced with cycle parking
- Widen the crossover and associated access point to the underground car park
- The replacement of a single 'cork screw car lift' with that of a double car lift
- Introduce a disabled parking bay at ground floor level within the car park
- Replace a service store at basement level with cycle storage
- Relocates parking spaces and add an additional parking space at basement level

4.50 In respect of vehicle parking, the proposal continues to provide thirty-eight (38) car spaces proposed for the 100 residential units and would not be acceptable. Transport officers, in applying census data which shows car ownership in the area as well as the estimate car ownership of the area, have demonstrated in both scenarios, the parking provision is not suitable for the proposed mix of units in this case, and the overspill parking would have negative consequences for existing residents in the local area and put additional stress on the local area. Furthermore, the lack of any parking surveys provided with the application means it is not possible to make a full assessment on the impact of any on street parking.

4.51 In respect of commercial parking, 28 spaces are proposed and would not be acceptable.

4.52 In respect of vehicle parking layout and access, one-way movement within the car park, remains and the lack of waiting bays remains.

- 4.53 The replacement of the single 'cork screw' car lift with that of a double car lift still retains the principle concern of a car lift within this development
- 4.54 The short-stay spaces at ground floor level have now been omitted.
- 4.55 In respect of servicing, shared access between the service yard and the access to the car park and car-lift remains.
- 4.56 In respect of cycle parking, the basement location for the majority of cycle storage is neither convenient for future occupiers/users, nor accessible and as such not considered to be acceptable.
- 4.57 Given the above, the scheme cannot be supported on these terms.
- 4.58 Having been consulted, London Underground Infrastructure Protection (TfL) had no comment. Any comment on the revised information provided by Network Rail shall be reported at the meeting.
- 4.59 To fully encapsulate the revised information, the reason for refusal requires the following amendment:
- 4.60 *The proposed development, due to the design of the car park and servicing areas, including the under provision of parking spaces, some parking spaces being inaccessible and the dependence upon a car lift for basement access, together with the intensity and combination of uses, would result in the generation of significant additional traffic and parking pressures on the local and strategic road network such as access points conflicting with vehicles queueing in Green Street and vehicle conflicts in the servicing area with potentially high numbers of delivery vehicles, in an area without a controlled parking zone, adding to existing traffic and parking capacity issues without adequate proposals for mitigation. As such, and having regard to housing need, the presumption in favour of approving sustainable*

development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policy T6 of the London Plan (2021) Policy CP23, CP24 and CP30 of the Enfield Core Strategy (2010) and Policy DMD45, DMD47 and DMD48 of the Enfield Development Management Document (2014).

4.61 Reason for refusal 6: Impact on amenity of Langley Court

4.62 *The proposed development, due to the close proximity of the first floor amenity space and habitable room windows on its south eastern side to the neighbouring 3 storey residential block at Langley Court, 243 Green Street, would establish high levels of inter-visibility between the new block and existing neighbouring residents, giving rise to unacceptable levels of overlooking and loss of privacy. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policies D4 and D6 of the London Plan (2021), Policies CP4 and CP30 of the Enfield Core Strategy (2010) and Policies DMD8, DMD10, and DMD43 of the Enfield Development Management Document (2014).*

- Revised information: No change building form – however additional boundary treatment proposed
- Report for Planning Committee on 19th July 2022: Impact on Neighbouring Amenity cited at paragraphs 9.67 – 9.76

4.63 The application site is a kite shaped plot of land that adjoins public highway land and railway tracks in two of the sides and the flank elevation of the adjoining buildings. As such given its relationship with neighbouring properties it is not considered to have an acceptable impact in terms of privacy, overlooking and overbearing impact for neighbouring properties.

- 4.64 There is significant concern with regard to the impact of the proposed tower in terms of its sheer scale and proximity, along with its windows to habitable rooms on its south eastern side from the first floor upwards and their close proximity to habitable room windows at the northern end of the adjacent residential block called Langley Court at 243 Green Street. The levels of inter-visibility at a distance of less than 6 metres would give rise to unacceptable conditions of overlooking and loss of privacy and the scale and form of the 'podium' and building as a whole would also give rise to unacceptable overbearing conditions. This distance is closer for the southern extent of 1st floor amenity space that is located on this adjacent boundary.
- 4.65 In seeking to address this matter, the submitted documents indicate that the first floor level communal external amenity space located to the east and west would be bound by a 1.8m timber fence, along with a 3.5m bamboo screen, along with potential obscure glazing to windows within the development.
- 4.66 It should be noted that on plan however, these spaces are incorrectly labelled as 'winter gardens', with no details demonstrating these as glazed areas, thermally separated from the interiors and having a drained floor and not considered therefore as such.
- 4.67 In considering the additional boundary treatment, whilst their inclusion could potentially reduce any overlooking, particularly with the occupiers of the adjacent residential block of Langley Court, the associated height, effectively that of another floor level, opaque nature and proximity to the neighbouring facades would itself result in an overbearing impact that would give rise to an excessive unneighbourly sense of enclosure.
- 4.68 In considering obscuring a number of windows within the development, such a proposal would give rise to the diminution in the quality of accommodation proposed, particularly outlook and access to sunlight.

- 4.69 The proposal would therefore compromise the quality of the amenity for the neighbouring residents and be of poor detailed design that further substantiates Reason for Refusal 3.
- 4.70 In terms of the additional boundary treatment and its detailed design, the introduction of such makeshift treatment at this high-level location is a symptom of a poorly designed building for which the form of the building should itself address. Instead, a material with no relationship to that of the building is to be introduced that again exhibits a tell-tale symptom of poor design which represents an incoherent nor holistic approach and therefore cannot be supported on these terms
- 4.71 To fully encapsulate the additional boundary treatment and account for paragraph 9.69 of the report presented Planning Committee on 19th July 2022, the reason for refusal requires the following amendment:
- 4.72 *The proposed development, due to the form, scale, massing and close proximity to the neighbouring 3 storey residential block at Langley Court, 243 Green Street, would result in an overbearing impact that would give rise to an excessive unneighbourly sense of enclosure, as perceived from neighbouring properties including Langley Court. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policies D4 and D6 of the London Plan (2021), Policies CP4 and CP30 of the Enfield Core Strategy (2010) and Policies DMD8, DMD10, and DMD43 of the Enfield Development Management Document (2014).*
- 4.73 **Reason for refusal 7: Impact on amenity of future residents**
- 4.74 *The proposed development due to the inadequate design of the communal amenity spaces on floors 1, 6 and 11 would give rise to high levels of inter-visibility, and potentially access between users of that amenity space and the residents with flats that abut those spaces, resulting in poor security, a lack of privacy and a poor quality living environment for future residents. As such, and having regard to*

housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policy D6 of the London Plan (2021), Policy CP30 of the Core Strategy (2010), 3.5, 3.6 of the London Plan (2015), the London Housing SPG and Policy DMD 8 and DMD 9 of the Enfield Development Management Document (2014).

- Revised information: No change building form/site arrangement/ detailed design – however intention of restricted access provided
- Report for Planning Committee on 19th July 2022: Privacy cited at paragraphs 9.49 – 9.53

4.75 Within the tower itself, the primary windows of all the habitable rooms of the proposed apartment block would enjoy a satisfactory level of privacy for all the upper levels. The oval footprint of the tower, with windows and private amenity looking outward at considerable distances to surrounding buildings would ensure high levels of privacy for future occupiers.

4.76 However, it is considered that the privacy could be compromised for the residents of the 1st, 6th and 11th floors. This is because the residential units on these levels would abut the external communal amenity areas situated on these floors. Given that there would be no defensible space between the communal areas and the flats, this would compromise the quality of the amenity for the future residents of these flats. The inclusion of privacy screens and obscure glazing could potentially reduce any overlooking, but potentially to the detriment of outlook from these flats and their internal levels of light. The security of the residential units on these levels would also be compromised by this conflict.

4.77 In seeking to address this matter, the submitted documents indicate that the first floor level communal external amenity space to the east and all external communal

amenity spaces at sixth and eleventh floors would be restricted for access by neighbouring apartments or accessible for management and maintenance only.

- 4.78 In first considering restricting these spaces for management and maintenance only, whilst this would remove opportunities to overlook these flats, this, amongst the provision of playspace, which is a sperate requirement, would appear to remove all external communal amenity space forming part of this development, thereby further diminishing the quantity and quality living environment for the future residents, that further substantiates Reason for Refusal 3 and therefore cannot be supported on these terms.
- 4.79 In considering restricting these spaces for neighbouring apartments, whilst this would limit the total number of occupiers within the building capable of overlooking the adjacent flats, in the absence of defensible space between the communal areas and the flats, such a relationship would still afford access from multiple occupiers that would compromise the quality of the amenity for the future residents of these flats and therefore cannot be supported on these terms.
- 4.80 To fully encapsulate the revised information, the reason for refusal requires the following amendment:
- 4.81 *The proposed development due to the inadequate design of the communal amenity spaces on floors 1, 6 and 11 would give rise to high levels of inter-visibility, and potentially access between users of that amenity space and the residents with flats that abut those spaces, resulting in poor security, a lack of privacy and a poor quality living environment for future residents. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, it would be contrary to Policy D6 of the London Plan (2021), Policy CP30 of the Core Strategy (2010), 3.5, 3.6 of the London Plan (2015), the London Housing SPG and Policy DMD 8 and DMD 9 of the Enfield Development Management Document (2014).*

4.82 **Reason for refusal 8: SuDS / FRA**

4.83 *The proposed development is not accompanied by an adequately comprehensive sustainable drainage strategy that would clarify how the development shall meet Greenfield Runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) events and utilise Sustainable Urban Drainage Systems (SuDS) in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management. As such the proposal fails to accord with Policies SI12 and SI13 of the London Plan (2021), Policy CP21 and CP28 of the Enfield Core Strategy (2010) and Policy DMD61 of the Enfield Development Management Document (2014).*

- *Revised information:* Provided a revised Flood Risk Assessment and Drainage Strategy Statement
- Report for Planning Committee on 19th July 2022: Sustainable Drainage cited at paragraphs 9.89 – 9.94

4.84 The development presented to Planning Committee on 19th July 2022 raised serious concerns in regards to the impact of the proposed development in terms of flooding and with the proposed drainage strategy.

4.85 LLFA officers confirmed the submitted Flood risk Assessment did not demonstrate that the development is safe from flooding and that it would not increase flood risk elsewhere.

4.86 In seeking to address this matter, the applicant provided a revised Flood Risk Assessment and Drainage Strategy Statement, by McCloy consultants.

4.87 In review, LLFA officers sustain their objection on flood risk grounds.

- 4.88 Fundamental matters have failed to be accounted for, particularly likely flood levels during storm events, the associated feasibility of basement levels and, in the absence of adequate levels for level flood compensation, the proposed development would actually increase the flood risk to neighbouring developments.
- 4.89 The revised document also draws upon data sources that are not up to date and it fails to consider flood compensation and flood management through any recognised flood models, it fails to account for the dangers flood risks present in terms of safe evacuation and again fails to adequately provide a comprehensive sustainable drainage strategy and therefore cannot be supported on these terms and Reasons for Refusal 8 remains.
- 4.90 Having been consulted, the Environment Agency raised no objection but that does not contradict the objection raised by Council officers as the LLFA.
- 4.91 **Reason for Refusal 9: Financial contributions**
- 4.92 *In the absence of a legal agreement to secure policy compliant financial and nonfinancial contributions including for affordable housing, health care, employment, skills, training and enterprise, transport matters, public realm improvements and carbon offsetting contribution, the development fails to mitigate its impact on local services, amenities, infrastructure and environment. This is contrary to the requirement of policy DF1 of the London Plan, Policy CP46 of the Enfield Core Strategy (2010) and the Enfield Section 106 Supplementary Planning Document (2016).*
- Revised information: Provided a Financial Viability Assessment
 - Report for Planning Committee on 19th July 2022: Affordable housing provision cited at paragraphs 9.17 – 9.23

- 4.93 Policy H4 (Delivering Affordable Housing) and H5 (Threshold Approach to Applications) of the London Plan (2021) expect provision of on-site affordable housing on all major development. Policy H4 states that:
- 4.94 “All major development of 10 or more units triggers an affordable housing requirement.....”
- 4.95 The development presented to Planning Committee on 19th July 2022 proposed 40 affordable units representing 40% of the total and although meeting the minimum 35% London Plan (2021) threshold to follow the GLA’s “fast track” route that allows housing schemes that are referable to the GLA to proceed without viability testing, the GLA confirmed the application would not be eligible to proceed without testing viability testing.
- 4.96 Without being eligible for the fast track route, the applicant was required to provide a full viability assessment in order to establish whether the proposal is policy compliant. In seeking to address this matter, the applicant has now provided a Financial Viability Assessment, prepared by Savills.
- 4.97 Having been reviewed by the Council’s independent assessor, BNP Paribas, it has been concluded that the scheme with 40% affordable housing generates a deficit of c. £13.71m when benchmarked against a site value of c. £0.08m. Furthermore, a scheme with 100% market housing and therefore no affordable housing as part of this scheme, also generates a deficit of c. £9.34m. The proposal is therefore considered unviable.
- 4.98 The scheme would also be subject to secure policy compliant financial (and nonfinancial) contributions including, CIL, health care, employment, skills, training and enterprise, transport matters, public realm improvements and carbon offsetting contributions as follows:

Community Infrastructure Levy (CIL)

Enfield CIL

- Residential £120 x deemed net chargeable area
- Non-residential use A1, A2, A3, A4 & A5 £60 x deemed net chargeable area

Mayoral CIL

- £60 x deemed net chargeable area

Section 106

The proposed scheme is for 100 units, based on the size and scale of this type of development we would normally seek the following standard heads of terms subject to viability;

- Affordable Housing
- Education contribution based on a standard formula of £2535 x number of units (irrespective of housing mix).
- Transport mitigation works / contribution towards local infrastructure projects
- Access to open space and children's play facilities on site or contribution towards improving the quality, quantity or access to existing open space and play facilities.
- Employment and skills plan – apprenticeship placements based on 1 per £1m estimated build cost or alternate Business and Employment Initiative Contribution in the event that it is not possible to employ the number of agreed apprenticeship placements.
- Carbon offsetting price from £60/tonne to £95/tonne.
- S106 monitoring fee (5% of financial contributions)

4.99 It should be noted however, the submitted financial viability assessment not only fails to factor the above contributions within its appraisal, but also demonstrates that the scheme is unviable. Therefore any obligations necessary to reduce the impacts arising from the development, and secure the provision of supporting

infrastructure, such as new schools, health facilities and open spaces cannot be assumed as being provided along with this scheme.

4.100 In the absence of a legal agreement to secure policy compliant financial and nonfinancial contributions including for affordable housing, health care, employment, skills, training and enterprise, transport matters, public realm improvements and carbon offsetting contribution, the development fails to mitigate its impact on local services, amenities, infrastructure and environment and therefore cannot be supported on these terms and Reasons for Refusal 9 remains.

4.101 **Reason for refusal 10: Fire strategy**

4.102 *In the absence of a Fire Strategy the application is contrary to Policy D12 of the London Plan (2021)*

- Revised information: Provided a Fire Statement
- Report for Planning Committee on 19th July 2022: Fire Safety cited at paragraph 9.122

4.103 London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.

4.104 In this case, the applicant has provided a Fire Statement.

4.105 The building control officer has assessed the details and consider the information to be insufficient. Particular concern is raised in respect of the identified strategies relating to the 'evacuation philosophy', 'escape within the common areas', 'escape within car park areas' and 'elements of structure', whereby the identified areas of

- escape, areas to stay put, smoke ventilation systems proposed, the access routes and the lack of suppression methods (sprinkler systems) in key areas of the building including the car park, are contrary to the relevant guidance and therefore raise significant concern. In addition, the submitted Fire Statement, acknowledging the building height exceeds 50m, fails to provide a required Quantitative Design Review.
- 4.106 In the absence of a suitable fire strategy, the development fails incorporate features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans, contrary to Policy D12 of the London Plan (2021) and therefore cannot be supported on these terms.
- 4.107 To fully encapsulate the revised information, the reason for refusal requires the following amendment:
- 4.108 *In the absence of an adequate Fire Strategy, the application is contrary to Policy D12 of the London Plan (2021).*
- 4.109 Any comment provided by HSE and LFB shall be reported at the meeting.
- 4.110 **Reason for refusal 11: Inclusive design statement**
- 4.111 In the absence of an inclusive design statement that demonstrates how the proposals will deliver an inclusive environment, the application is contrary Policy D3 of London Plan (2021), Policy DMD37 and DMD39 of the Enfield Development Management Document (2014) and the Accessible London SPG.
- 4.112 Revised information: No change building form/site arrangement/ detailed design – however Design Statement provided
- 4.113 *London Plan Policy D5 outlines the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them. The built environment includes*

the internal and external parts of buildings, as well as the spaces in between them. Despite recent progress in building a more accessible city, too many Londoners still experience barriers to living independent and dignified lives, due to the way the built environment has been designed and constructed or how it is managed. An inclusive design approach helps to ensure the diverse needs of all Londoners are integrated into Development Plans and proposals from the outset. This is essential to ensuring that the built environment is safe, accessible and convenient, and enables everyone to access the opportunities London has to offer.

4.114 Development proposal should achieve the highest standards of accessible and inclusive design. They should:

- a) be designed taking into account London's diverse population
- b) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
- c) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
- d) be able to be entered, used and exited safely, easily and with dignity for all
- e) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to

4.115 In this case, the applicant has provided a Design Statement.

4.116 Fundamental matters have failed to be accounted for, particularly in respect of parts a, b, c d and e above. Whilst the document provides an outline justification for the scheme in terms of its form, relationship with the public realm and features within, substantive details which account for and indicate an inclusively designed

scheme are deficient. Officers recognise on plan, elements of the proposal appear to offer level access and accessibility throughout the building, however in the absence of any supporting and substantive information accounting for parts a, b, c d and e above the proposal cannot be supported on these terms.

4.117 To fully encapsulate the revised information however, the reason for refusal requires the following amendment:

4.118 In the absence of an adequate inclusive design statement that demonstrates how the proposals will deliver an inclusive environment, the application is contrary Policies D3 and D5 of London Plan (2021), Policy DMD37 and DMD39 of the Enfield Development Management Document (2014) and the Accessible London SPG.

4.119 **Reason for refusal 12: Children's play space**

4.120 *The proposal is deficient in the provision of on-site children's play space required for the likely child yield of the development contrary to Policy S4 of the London Plan (2021)*

- Revised information: First and roof plan identifying areas for play space and associated facilities
- Report for Planning Committee on 19th July 2022: On-site Playspace cited at paragraphs 9.82 – 9.87

4.121 Policy S4 (Play and inform recreation) of the London Plan (2021) expects on-site play space to be provided for all major developments and additional guidance is provided in the adopted shaping neighbourhoods: play and informal recreation SPG (2012). Policy S4 sets out core expectations of play space.

- 4.122 Residential developments should incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
- provides a stimulating environment
 - can be accessed safely from the street by children and young people independently
 - forms an integral part of the surrounding neighbourhood
 - incorporates trees and/or other forms of greenery
 - is overlooked to enable passive surveillance
 - is not segregated by tenure
- 4.123 Using the GLA population yield calculator a forecast total of 89.1 children are envisaged to be residing within the development between the ages of 1-17. As such, 891m² of playspace is required on site meeting the criteria set out above.
- 4.124 In this case, the applicant has provided additional floorplans demonstrating that they are providing approximately 551m² of playspace*, this figure relates to a portion of external amenity space at first floor level and the external amenity space on the roof (19th Floor).
- 4.125 This is an acknowledged discrepancy within the submission however and if all external amenity space (excluding that given as private) were given to play space this would total 862m² as indicated on the applicants' schedule.
- 4.126 The area identified as play space at first floor level, by virtue of its proximity to residential units at this floor, along with a lack of defensible space would itself compromise the quality of the amenity for the future residents of these flats. The security of the residential units on these levels would also be compromised by this conflict. The inclusion of privacy screens and obscure glazing could potentially reduce such overlooking, but potentially to the detriment of outlook from these flats and their internal levels of light.

- 4.127 Furthermore, the area identified as playspace situated on the roof of the proposed tower block, by virtue of its location would fail to comply with several of the requirements of the London Plan Policy S4, as it cannot be accessed safely from the street by children, would not form an integral part of the surrounding neighbourhood and would not be overlooked enabling passive surveillance.
- 4.128 The proposal (including the relevant revised information), therefore represents a significant shortfall in the required on-site provision and is insufficient to meet the demands of future occupiers, contrary to Policy S4 (Play and informal recreation) of the London Plan (2021).
- 4.129 As a consequence of the changes proposed, the repurposing of all external spaces for the provision of play space would result in the entire loss of communal external space as par to this development and again demonstrates another tell-tale sign of overdevelopment that further substantiates Reason for Refusal 3.
- 4.130 To fully encapsulate the revised information, the reason for refusal requires the following amendment:
- 4.131 *The proposal is deficient in the provision of on-site children's play space required for the likely child yield of the development contrary to Policy S4 of the London Plan (2021)*

5. CONCLUSION

- 5.1 Following Planning Committee on 19th July 2022, and in accordance with the resolution, officers have sought to proactively engage with the Applicants / Against to explore how amendments could be made to address the concerns identified and form the reasons for refusal
- 5.2 Unfortunately for the reasons explained above, the updates and additional information received, are not considered sufficient to significant alter the schedule

- 5.3 Officers are also mindful of the Housing Delivery Test and the *Presumption in Favour of Sustainable Development*. In the years up to and including 2020, Enfield delivered 56% of its 2,328 homes target. In the monitoring period from 1 April 2020 to 31 March 2021 Enfield delivered 70% of its 1,246 homes target. This means that Enfield has continued to fail to meet central government's Housing Delivery Test as set out in the National Planning Policy Framework 2021. As stated in paragraph 11(d) of the NPPF, the relevant development plan policies should, therefore, be considered out of date and planning permission should be granted unless:
- i the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or,
 - ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 5.4 The assessment of this application has been made first against the development plan polices and then against the NPPF and other relevant material considerations 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.
- 5.5 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.
- 5.6 The above assessment against the development plan policies has produced the following conclusion:

The proposed development would result in the overdevelopment of the site, the symptoms of which are:

- *The proposed development would be excessively tall and bulky, would bear no relation to the scale, character and appearance of the locality and would fail to integrate satisfactorily with its surroundings and cause unacceptable harm to the townscape of this locality;*
- *The proposed development would provide inadequate amenity space that would compromise the privacy and outlook of future residents;*
- *The proposal would provide insufficient child play space, for the children of future residents;*
- *The proposal would give rise to an excessive unneighbourly sense of enclosure for existing nearby residents;*
- *The proposal would result in congestion on surrounding streets;*

5.7 In addition, the proposal does not provide an adequately comprehensive drainage strategy, Fire Strategy or Inclusive Design statement and does not justify the loss of, or make alternative provision for the replacement of, the existing public house.

5.8 Whilst it is clear that the provision of 100 new homes is a positive merit of the proposal and would be of considerable public benefit, the viability tested omission of an affordable housing proportion, in addition to the tested unviability of the scheme generally demonstrates the shortcomings of the scheme, described in detail in the report above that would not be outweighed by this benefit.

5.9 For the reasons considered above whilst the Council recognises 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.

6. RECOMMENDATION

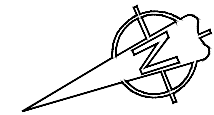
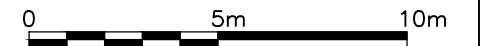
6.1 That, PLANNING PERMISSION BE REFUSED for the reasons stated in section 2 of the above report.

Notes

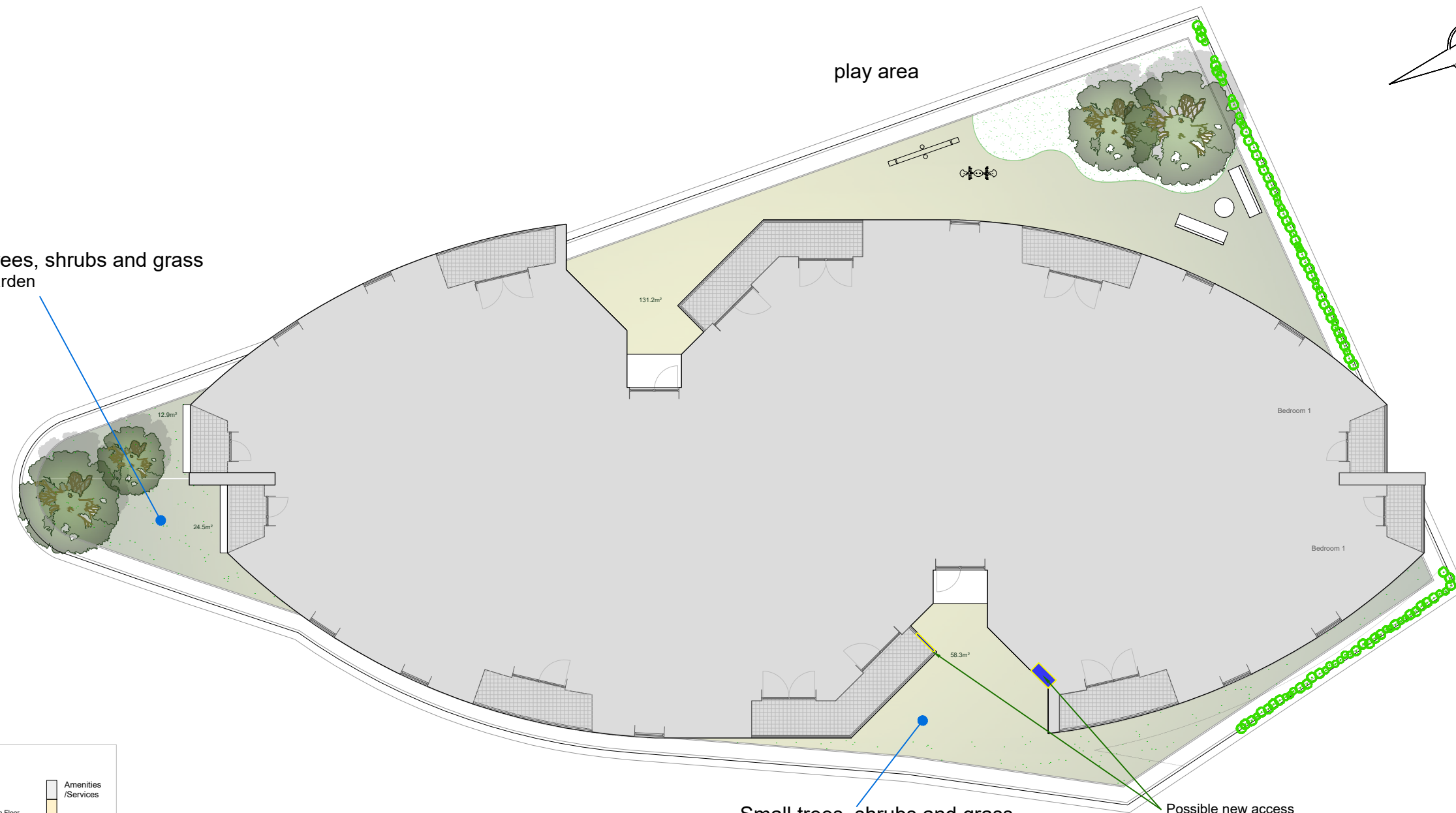
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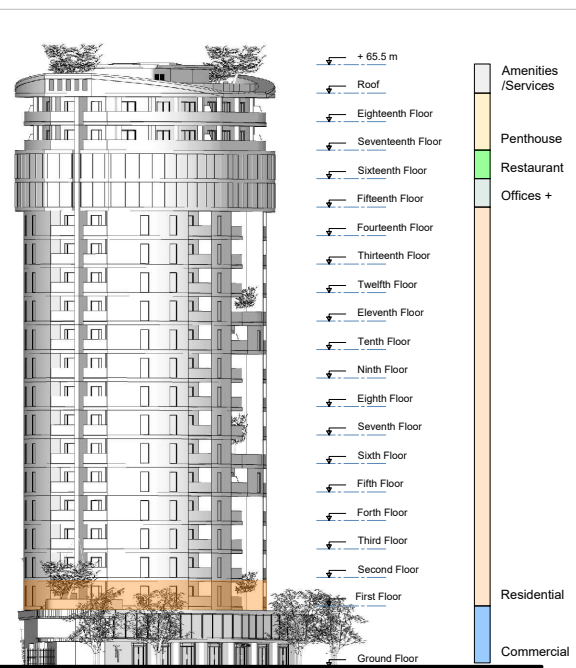


Small trees, shrubs and grass winter garden
37.4 m²



Small trees, shrubs and grass winter garden
58.3 m²

Possible new access if required
Possible restricted access if required



Key

Restricted access to winter gardens:

For management and maintenance or neighboring apartments only (shared)

In view of their particular location and contribution to the overall architectural aspect and composition, these green areas are considered to be beneficial to this proposal.

These spots of nature help in softening the appearance and elevation of this building as a natural break and therefore they need to be preserved.

However, the access to these areas will be limited and restricted to nearby residents (the two apartments either side if considered acceptable) and maintenance people only, reducing in fact any possible potential issue associated with previous free access.

FOR PLANNING

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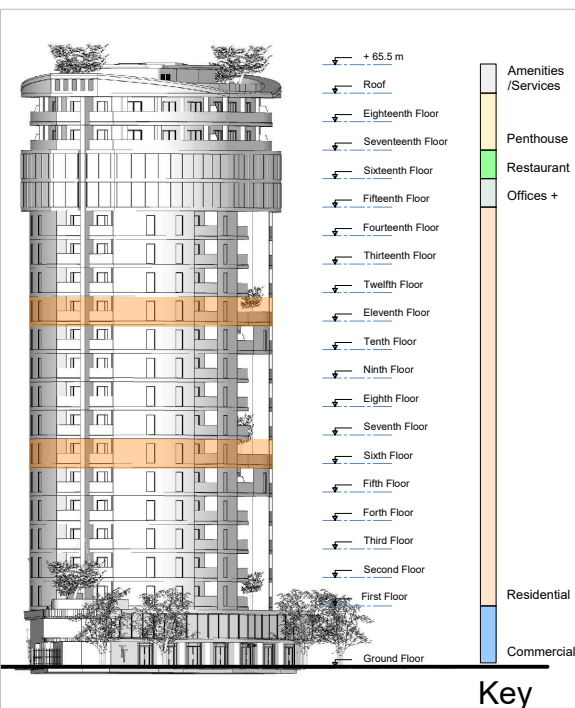
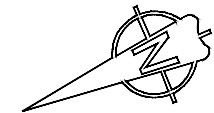
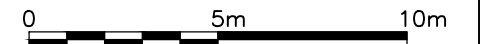
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title	First floor - winter garden	Option D1	
scale	1:200 @ A3	dwn	SD
date	Jan 2021	chk	MA
drg no.	427-1378-146	rev	

Notes

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rev. | date. | dwn.



Restricted access to winter gardens:

For management and maintenance or neighboring apartments only (shared)

In view of their particular location and contribution to the overall architectural aspect and composition, these green areas are considered to be beneficial to this proposal.

These spots of nature help in softening the appearance and elevation of this building as a natural break and therefore they need to be preserved.

However, the access to these areas will be limited and restricted to nearby residents (the two apartments either side if considered acceptable) and maintenance people only, reducing in fact any possible potential issue associated with previous free access.

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project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

title
 6th and 11th floor - winter garden Option D1

scale
 1:200 @ A3 dwn SD

date
 Jan 2021 chk chik

dra no.
 427-1378-145 rev MA

Subway

Notes

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rev.	date.	dwn.

1.8 m timber fence with 3.5m bamboo screen (Phyllostachys Aureosulcata)

Non openable window panel possibly obscured up to 1.7 m

View over roof level

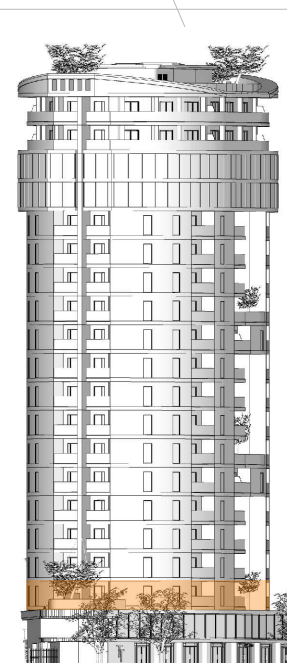
Langley Court

243

257

255

GREEN STREET



- + 65.5 m
- Roof
- Eighteenth Floor
- Seventeenth Floor
- Sixteenth Floor
- Fifteenth Floor
- Fourteenth Floor
- Thirteenth Floor
- Twelfth Floor
- Eleventh Floor
- Tenth Floor
- Ninth Floor
- Eighth Floor
- Seventh Floor
- Sixth Floor
- Fifth Floor
- Fourth Floor
- Third Floor
- Second Floor
- First Floor
- Ground Floor

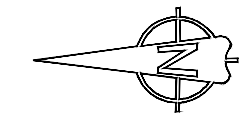
Key

Amenities /Services
Penthouse
Restaurant
Offices +
Residential
Commercial

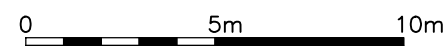
To reduce possible overlooking issues a 1.8 m timber fence with 3.5m bamboo screen will be implemented (Phyllostachys Aureosulcata)



Phyllostachys Aureosulcata



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project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

title
 First floor level - boundary treatment Option D1

scale	1:200 @ A3	dwn	SD
date	Jan 2021	chk	MA

drwg no.	427-1378-144	rev	
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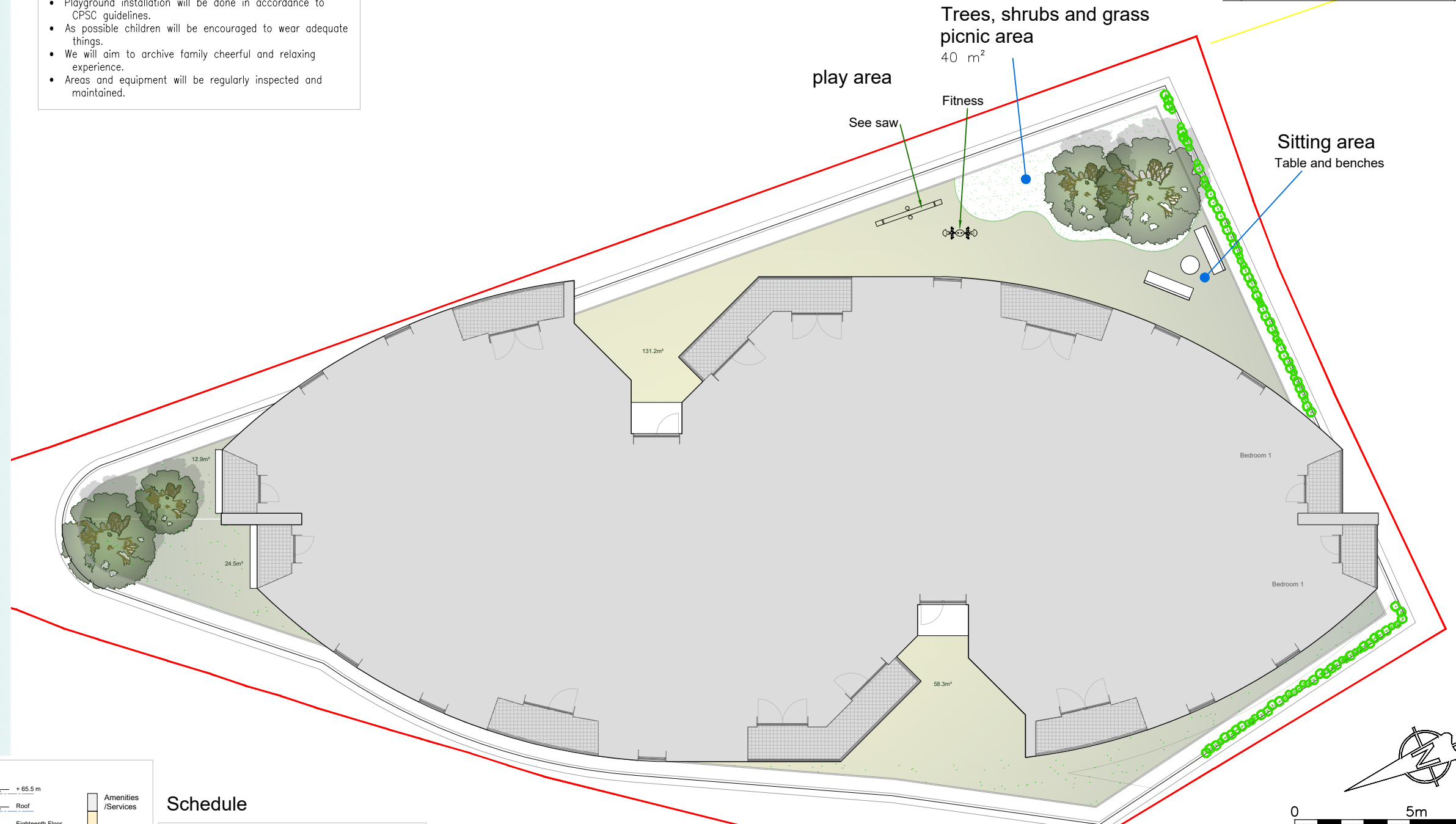
Notes

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- All equipment will be acquired from certified manufacturers.
- Where required the surface will be shock absorbent, rubber mulch or grass.
- Areas will be internally secured and monitored where required.
- Playground installation will be done in accordance to CPSC guidelines.
- As possible children will be encouraged to wear adequate things.
- We will aim to archive family cheerful and relaxing experience.
- Areas and equipment will be regularly inspected and maintained.



Inclusive Equipment

Inclusive playground equipment involves a wide range of features that make it possible for everyone to get involved in the play. From high-backed swings to ramps and railings, play structures make it safe for kids with disabilities to access the equipment and enjoy playing with all of their friends and family members.

The 2010 ADA Standards for Accessible Design requires that all new playground equipment and alterations to play areas that are designed after March 15, 2012, must meet specific accessibility requirements.

Approximately 17% of children ages 3 to 17 have one or multiple developmental disabilities.

Towers

Elevated play structures provide kids with the stimulation that they need to satisfy their need for adventure. Scaling ladders and rock walls to reach the top is a safe risk that helps kids develop their confidence and conquer their fears.

Children under the age of 9 who experience related injuries from a fall are less likely to be afraid of heights in their teens. A 13-week study revealed that participants increased their risk detection skills and self-esteem when they were provided with risky play intervention services.

Nets

Elevated play structures provide kids with the stimulation that they need to satisfy their need for adventure. Scaling ladders and rock walls to reach the top is a safe risk that helps kids develop their confidence and conquer their fears.

Climbing net structures teach kids problem-solving skills as they help net users to plan their hands and feet to reach the top. Studies with higher levels of gross motor skills have improved classroom behaviors in intervention schools.

Interactive

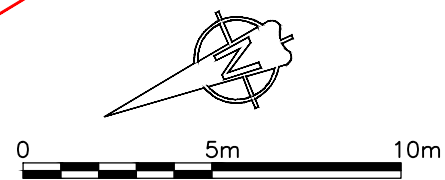
Interactive features combine technology with the beauty of being outside to bring kids new experiences that they can't find anywhere else. Dj booths, electronic sports courts, and activity zones bring people of all ages and abilities together while encouraging older kids to get outside and play.

Teens believe that playing music breaks down existing boundaries between people from different age ranges, cultural backgrounds and social groups. A study revealed that only 29% of teens engage in an hour or more of physical activity each day of the week.

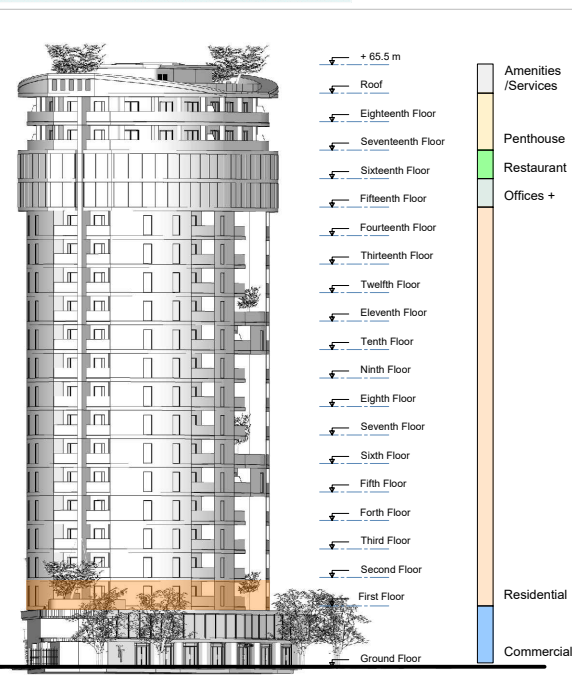
Poured In Place Safety Surfacing

A playground design should always begin from the ground up. Poured in place safety surfacing reduces the risk of injuries while being a cost-effective way to lower playground maintenance costs.

Approximately 80% of playground injuries are caused by falls. Poured in place safety surfacing makes it easier to comply with ADA standards since it provides access to the equipment for people with mobility aids.



FOR PLANNING



Schedule

Main play area	=	15.0 m ²
Adult sitting area	=	15.0 m ²
Green and picnic areas	=	40.0 m ²

Legend

- Grass and or rubber finish
- Permeable paving
- Grass and Flower beds
- Trees and Shrubs
- Playground area
- Sitting areas or benches
- Edge

Swings	Slides	Playground Climbers	Spring Riders	Spinners
Classic swings are still common, both with belt seats and bucket seats. But now there are many more swings to choose from including:	Slides haven't changed much, but there are many variations including:	Equipment that encourages kids to use their developing muscles to scale to the top of the structure and can include:	Consists of a seating component that offers comes in a fun shape, and a spring placed into the ground.	Many ground-mounted playground spinners and have many variations, including:
 Accelerator Swings Generation Swings	 Open Slide Tube Slide Free-Standing Slide	 Walker Climbers Vine Climbers Vertical Climbing Walls Rocks and Log Climbers Noodle Climbers	 Barrel Ride Spinner Maypole Spinner Tornado Spinner Whirl Spinner Inclusive Whirl	

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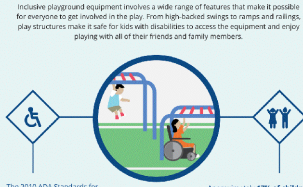
title
First floor - play areas Option D1

scale
1:200 @ A3 dwn SD

date
Jan 2021 chik MA

drg no.
427-1378-143 rev

Inclusive Equipment



The 2010 ADA Standards for Accessible Design requires that all new playground equipment and alterations to play areas that are designed after March 15, 2022, must meet specific accessibility requirements.

Approximately 17% of children ages 3 to 17 have one or multiple developmental disabilities.

Towers

Elevated play structures provide kids with the stimulation that they need to satisfy their need for adventure. Scaling ladders and rock walls to reach the top is a safe risk that helps kids develop their confidence and conquer their fears.



Children under the age of 9 who experience related injuries from a fall are less likely to be afraid of heights in their lives.

A research study revealed that participants increased their risk detection skills and self-esteem when they were provided with risky play intervention services.

Nets

Elevated play structures provide kids with the stimulation that they need to satisfy their need for adventure. Scaling ladders and rock walls to reach the top is a safe risk that helps kids develop their confidence and conquer their fears.



Children with higher levels of gross motor skills have improved classroom behaviors in intervention schools.

Students with higher levels of gross motor skills have improved classroom behaviors in intervention schools.

Interactive

Interactive features combine technology with the beauty of being outside to bring kids new experiences that they can't find anywhere else. Diagnostics, electronic sports courts, and activity zones bring people of all ages and abilities together while encouraging older kids to get outside and play.



Teens believe that playing music breaks down existing boundaries between people from different age ranges, cultural backgrounds and social groups.

A study revealed that only 29% of teens engage in an hour or more of physical activity each day of the week.

Poured In Place Safety Surfacing

A playground design should always begin from the ground up. Poured in place safety surfacing reduces the risk of injuries while being a cost-effective way to lower playground maintenance costs.



Approximately 88% of playground injuries are caused by falls.

Poured in place safety surfacing makes it easier to comply with ADA standards since it provides access to the equipment for people with mobility aids.



- All equipment will be acquired from certified manufacturers.
- Where required the surface will be shock absorbent, rubber mulch or grass.
- Areas will be internally secured and monitored where required.
- Playground installation will be done in accordance to CPSC guidelines.
- As possible children will be encouraged to wear adequate things.
- We will aim to archive family cheerful and relaxing experience.
- Areas and equipment will be regularly inspected and maintained.



Notes

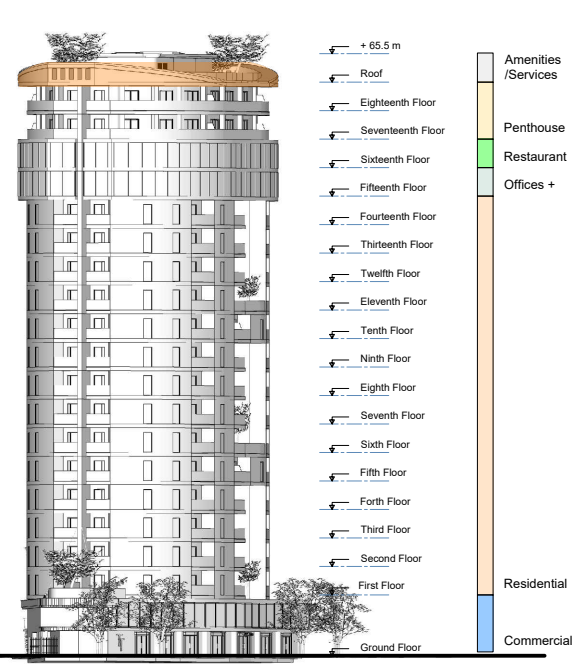
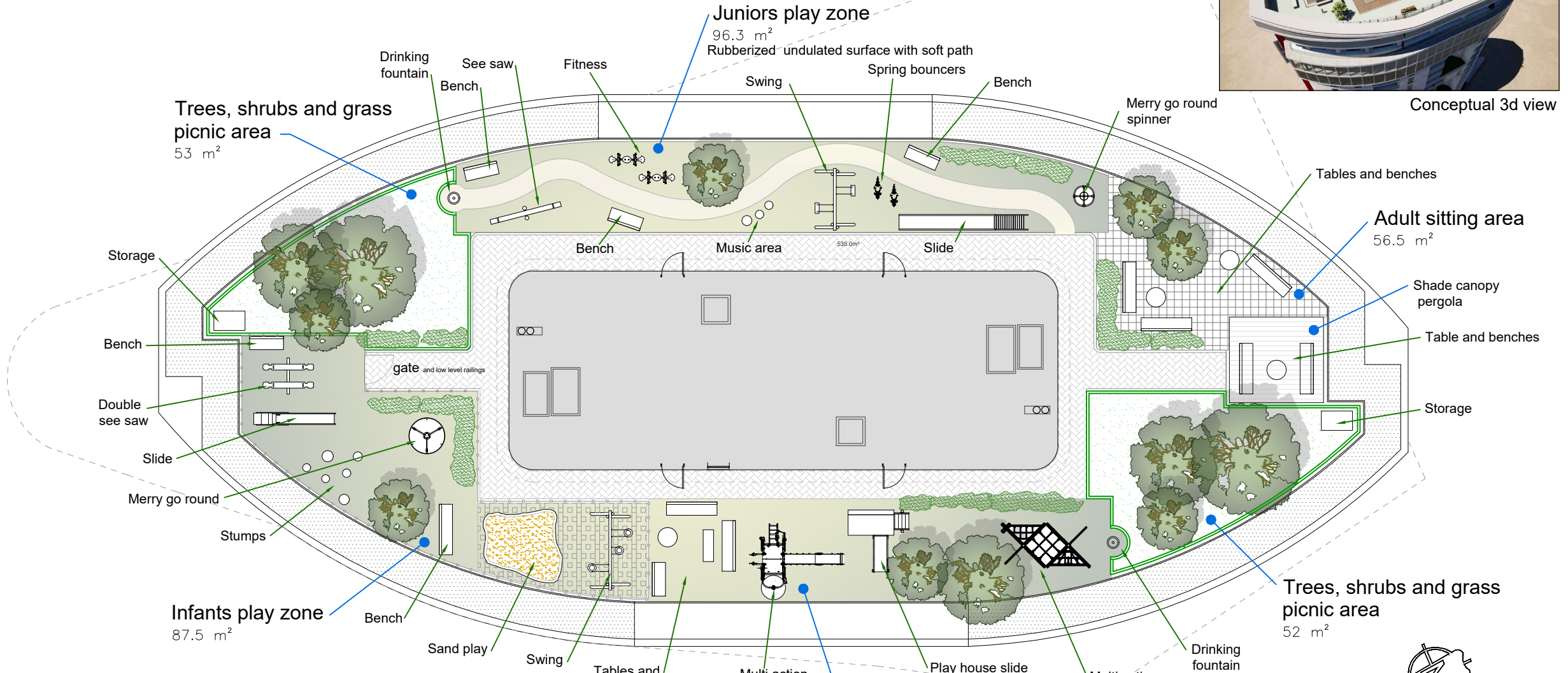
All dimensions to be checked by the Contractor before construction proceeds.

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rev.	date.	dwn.



Conceptual 3d view



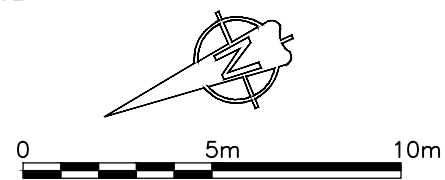
Schedule

Infant play area	=	87.5 m ²
Junior play area	=	96.3 m ²
Main play area	=	75.0 m ²
Adult sitting area	=	56.5 m ²
Green and picnic areas	=	105.0 m ²

Legend

	Grass and or bounce rubber finish
	Permeable paving
	Grass and Flower beds
	Trees and Shrubs
	Playground area
	Sitting areas or benches
	Edge

<p>Swings</p> <p>Classic swings are still common, both with belt seats and bucket seats. But now there are many more swings to choose from including:</p> Accelerator Swings Generation Swings	<p>Slides</p> <p>Slides haven't changed much, but there are many variations including:</p> Open slide Tube Slide Free-Standing Slide	<p>Playground Climbers</p> <p>Equipment that encourages kids to use their developing muscles to scale to the top of the structure and can include:</p> Walker Climbers Vine Climbers Vertical Climbing Walls Rocks and Log Climbers Noodle Climbers	<p>Spring Riders</p> <p>Consist of a seating component that offers comes in a fun shape, and is spring attached into the ground.</p>	<p>Spinners</p> <p>Merry-go-rounds have adapted to gardens and have many variations, including:</p> Barrel Ride Spinner Maypole Spinner Tornado Spinner Whirl Spinner Inclusive Whirl
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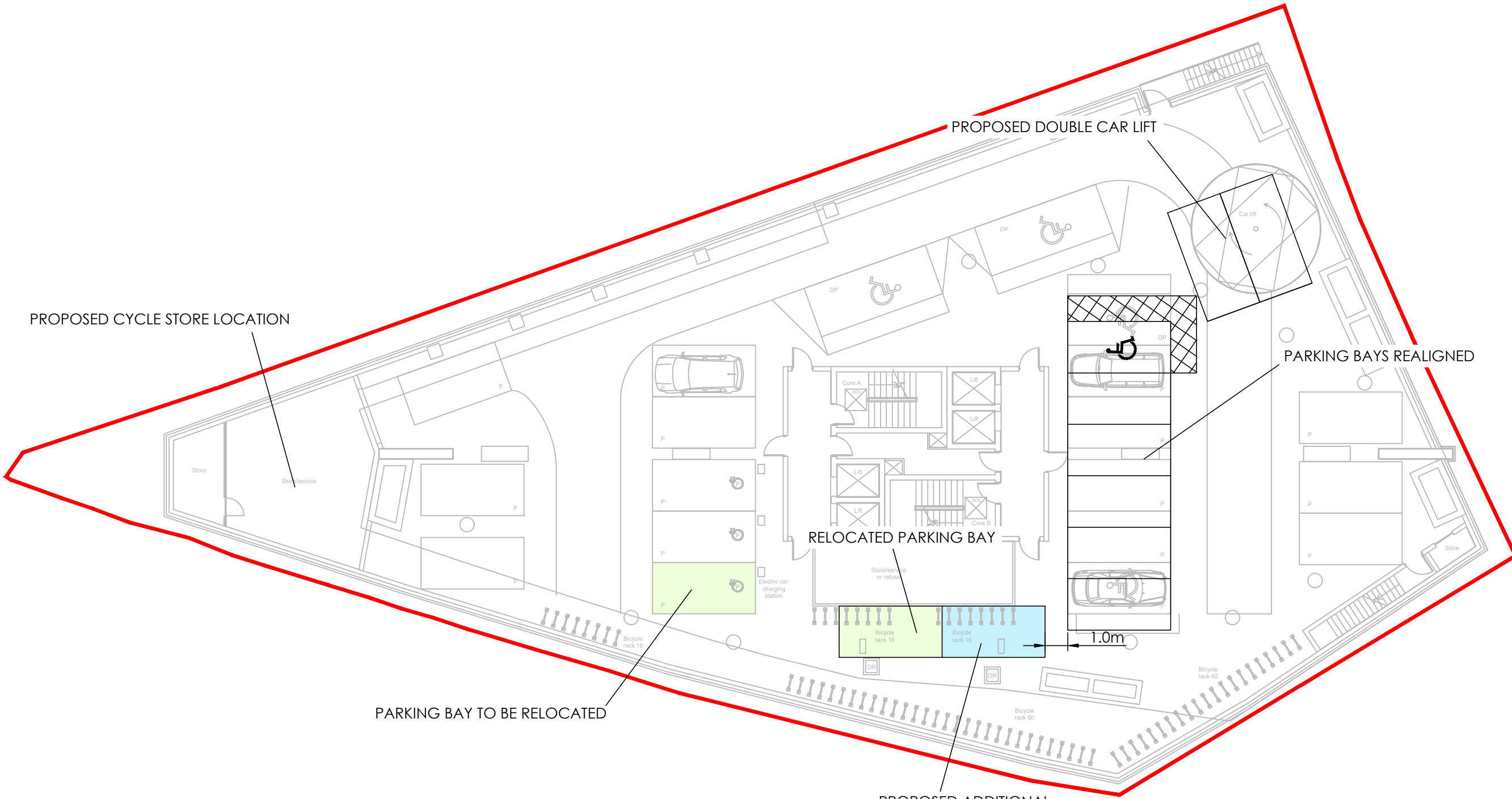
Intelligent Architecture and Surveying
47 Eversley Park Road, London N21 1JJ
T: 0208 4435882 M: 07956 296 076
E: info@i-arch.co.uk W: www.i-arch.co.uk

project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Roof plan - play areas Option D1

scale	1:200 @ A3	dwn	SD
date	Jan 2021	chk	MA

drg no.	427-1378-142	rev	
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NOTES

This drawing has been prepared for the purpose of planning discussions and does not constitute a detailed design drawing, or construction drawing. A Design Hazard Inventory has been prepared by RGP setting out the hazards which have been designed out. This is available upon request.

— SITE BOUNDARY

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RESIDUAL HAZARDS

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Rev.	Drawn	Comments	Date
P1	DLH	FIRST ISSUE	15/08/22



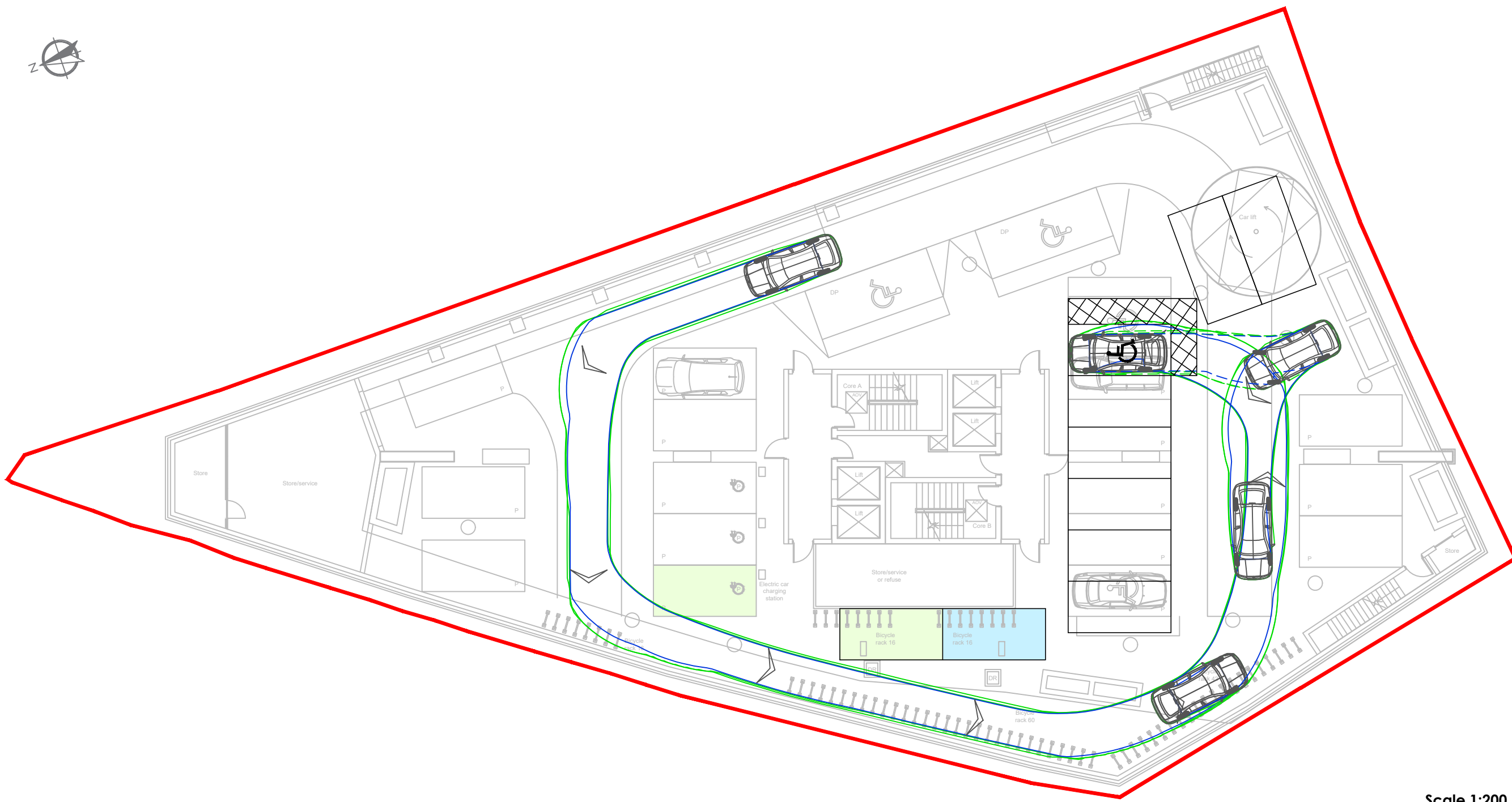
Client: Yen of London Ltd

Project: The Station Tavern, Green Street, Enfield

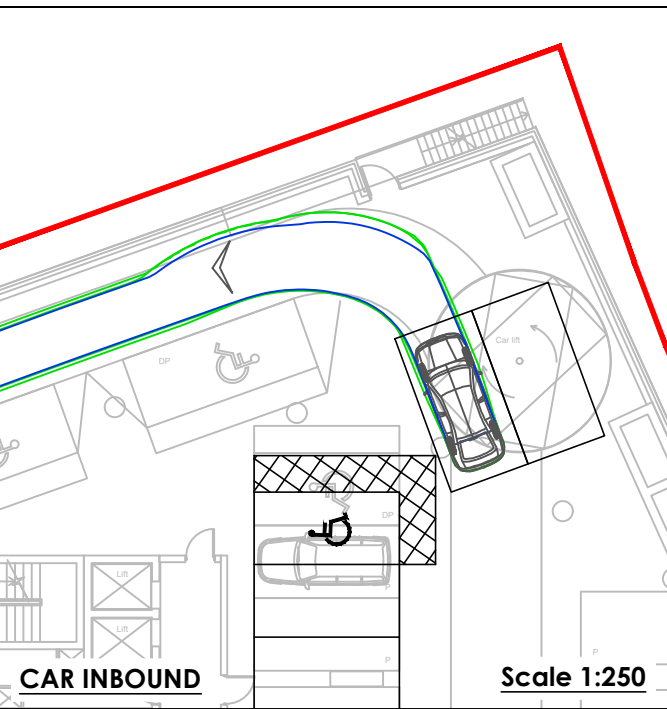
Drawing Title: Proposed Basement Layout

Drawing No: 2020/5545/006 Rev. P1

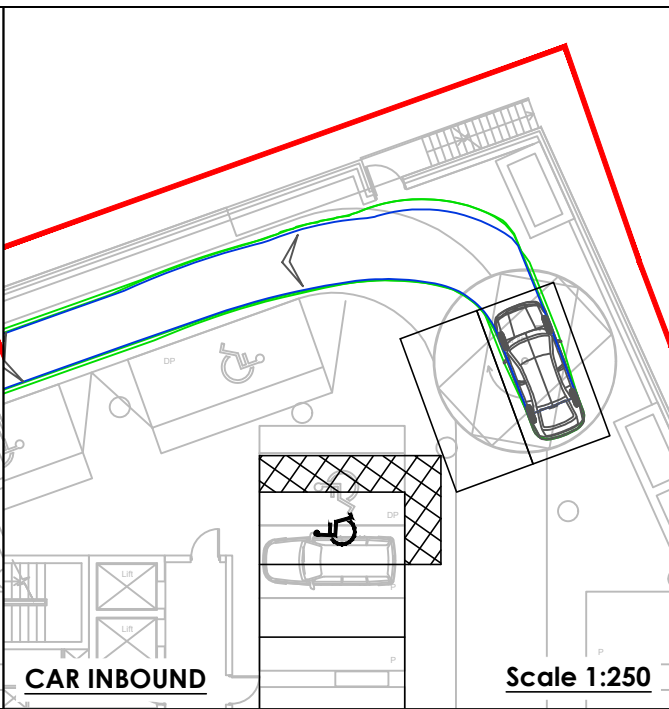
Scale: 1:250 Drawn By: DLH Checked By: BCC A3



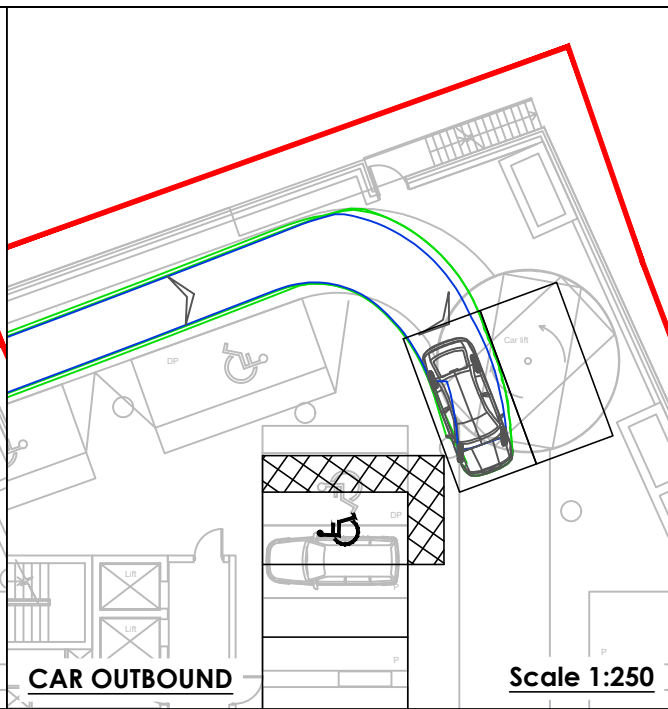
Scale 1:200



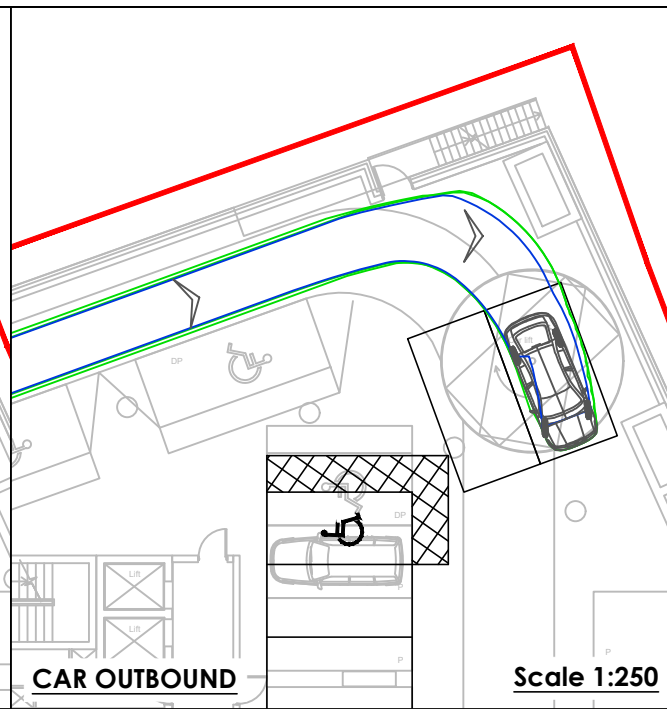
CAR INBOUND Scale 1:250



CAR INBOUND Scale 1:250



CAR OUTBOUND Scale 1:250

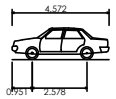


CAR OUTBOUND Scale 1:250

NOTES

This drawing has been prepared for the purpose of planning discussions and does not constitute a detailed design drawing, or construction drawing. A Design Hazard Inventory has been prepared by RGP setting out the hazards which have been designed out. This is available upon request.

— SITE BOUNDARY



Standard Car
Overall Length 4.572m
Overall Width 1.769m
Overall Body Height 1.488m
Min Body Ground Clearance 0.249m
Max Track Width 1.713m
Lock to lock time 4.00s
Kerb to Kerb Turning Radius 5.100m

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Rev.	Drawn	Comments	Date
P1	DLH	FIRST ISSUE	15/08/22



Transport Planning and Infrastructure Design Consultants
Shackleford Suite, Mill Pool House, Mill Lane, Godalming, GU7 1EY
1-2 Paris Garden, London, SE1 8ND
Tel: 01483 861681 / 020 7078 9662 www.rgp.co.uk

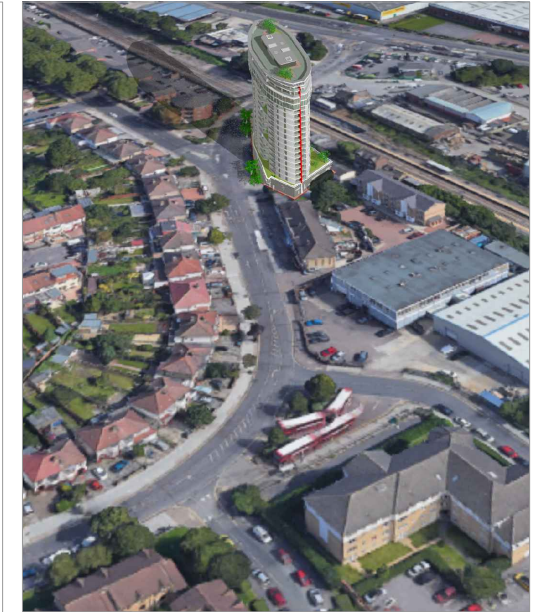
Client	Yen of London Ltd		
Project	The Station Tavern, Green Street, Enfield		
Drawing Title	Swept Path Analysis - Basement		
Drawing No.	2020/5545/006	Rev.	P1
Scale	As shown	Drawn By	DLH
		Checked By	BCC
			A3

Notes

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rev.	date.	dwn.
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3D view - Montage

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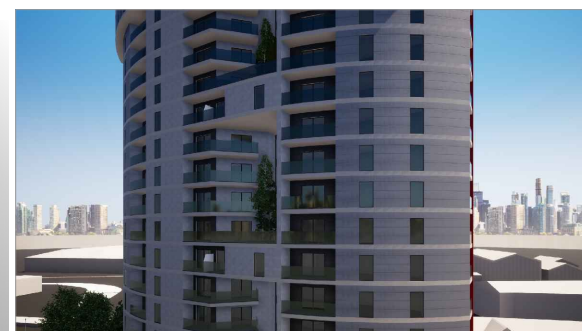
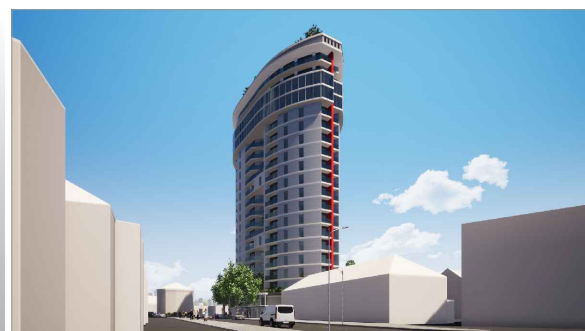
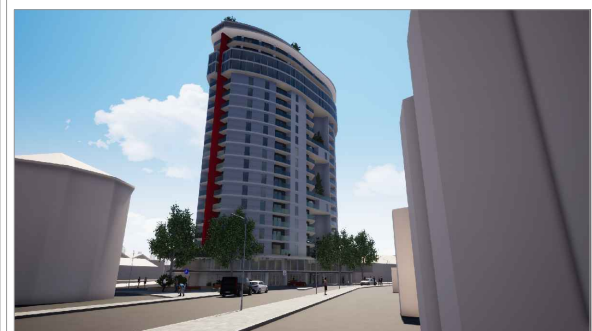
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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
3D views Option D1

scale NTS @ A3	dwn SD
date Jan 2021	chk MA

drg no. 427-1378-139	rev
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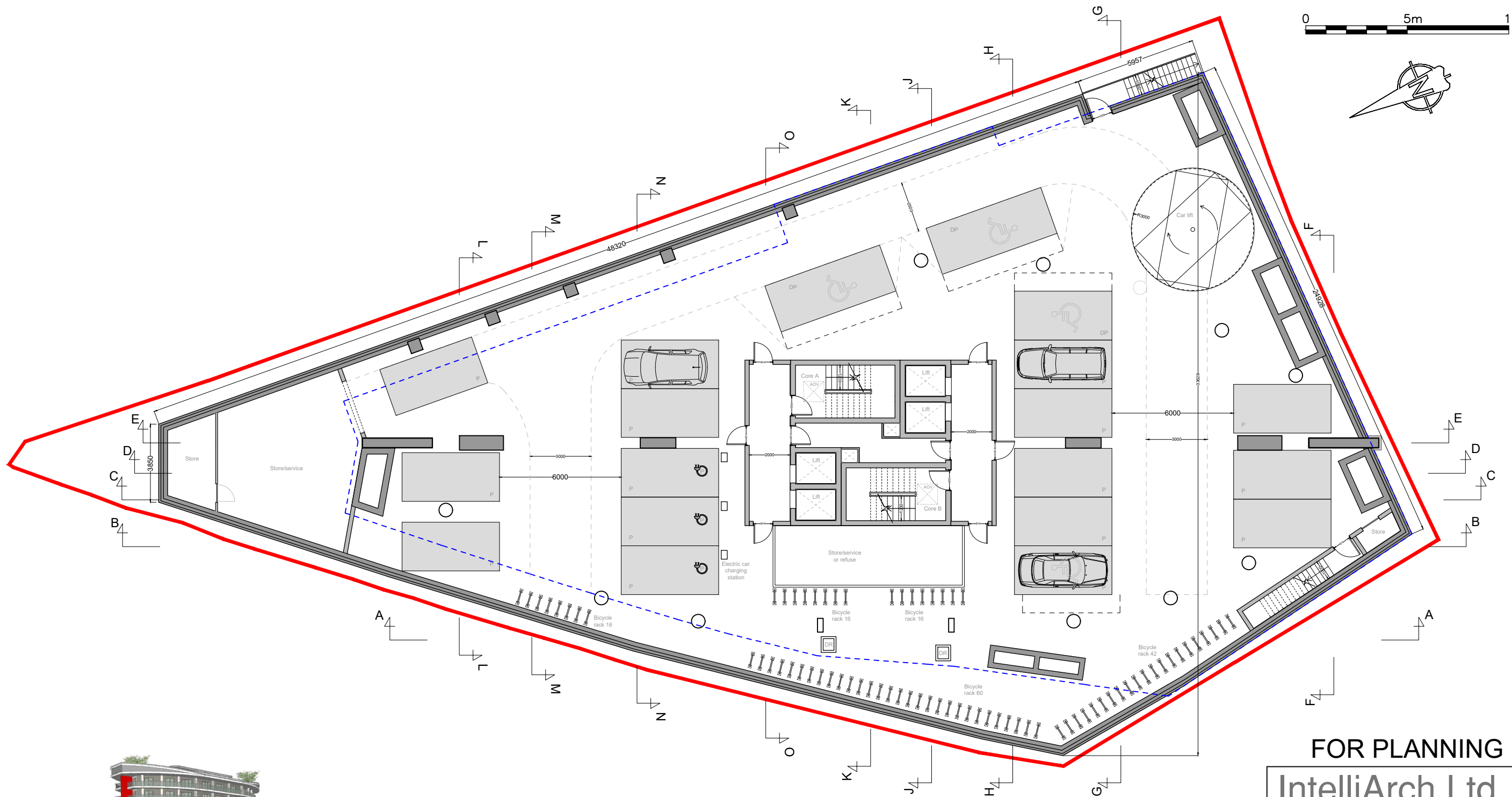
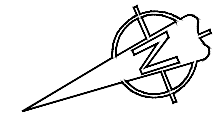
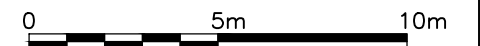
3D views - CGI

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Possibly two levels.
19 car parking spaces including
3 disable parking and
3 electric charging stations
150 secure cycle parking per floor

If necessary part of a basement floor can be used for services and plant

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project	Tepe Tower (former Station Tavern), Green Street, Enfield Mr M Tepe, Yen of London		
title	Basement floor plan (level -1 and level -2) Option D1		
scale	1:200 @ A3	dwn	SD
date	Jan 2021	chk	MA
drwg no.	427-1378-110	rev	

FOR PLANNING

-  BUILDING LINE
-  TIMBER FENCE LINE
-  STEEL FENCE LINE
-  ROAD EDGE LINE
-  ROAD CENTER LINE
-  SERVICE PIT
-  BOLLARD
-  LAMP POST
-  GULLY
-  MANHOLE
-  GAS
-  TREES
-  POST BOX
-  SURVEY NAILS

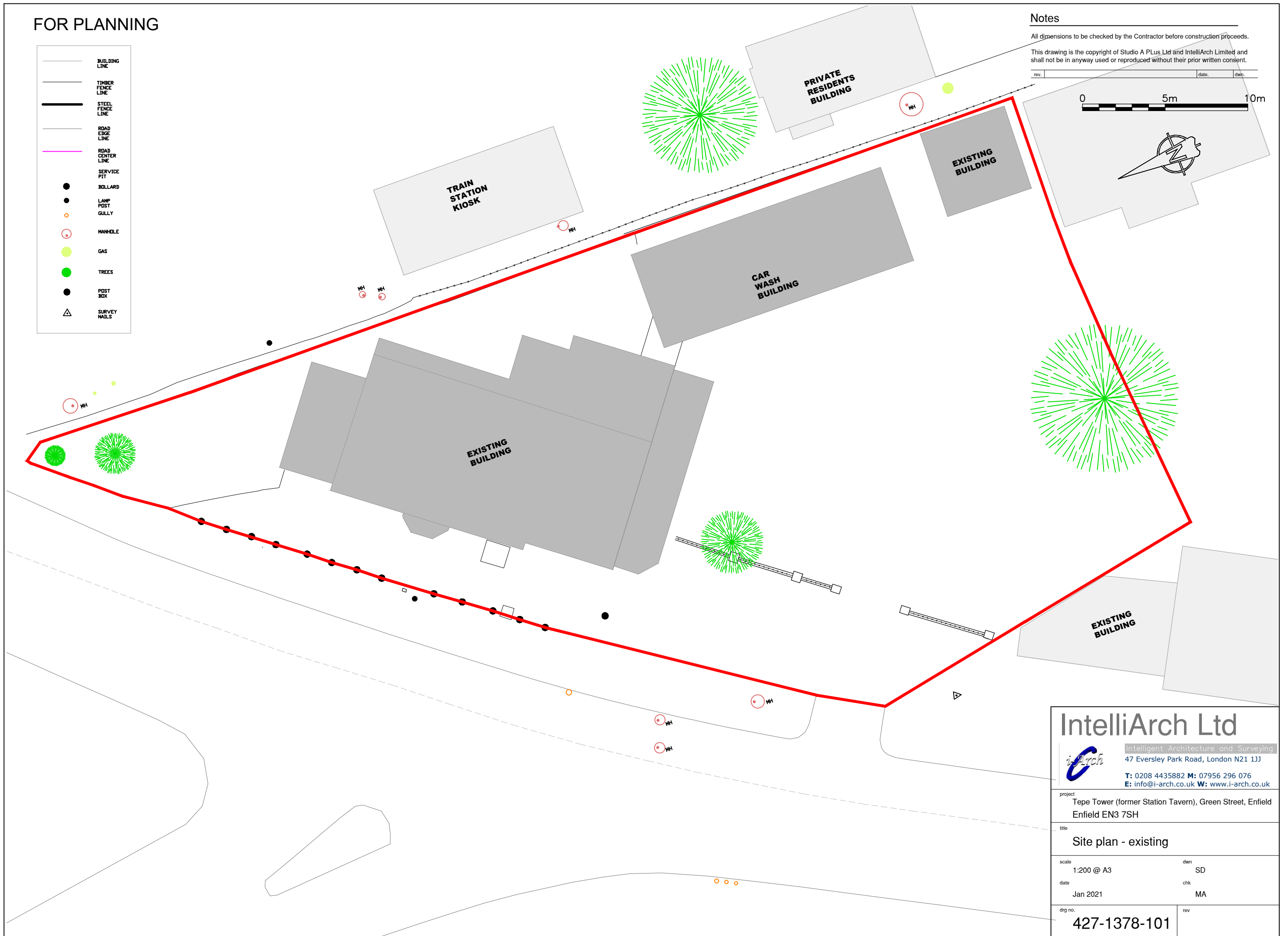
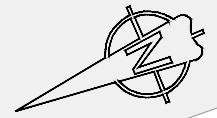
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rev.	date.	dwn.
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0 5m 10m



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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Enfield EN3 7SH

title
Site plan - existing

scale
1:200 @ A3

dwn
SD

date
Jan 2021

chk
MA

drwg no. 427-1378-101	rev
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FOR PLANNING

Site area = 1355 m²
 Building foot print (option A) = 1113 m²
 Building foot print (option D1) = 973 m²

72% used area ratio

- Site boundaries
- Current proposal (option D1) ground floor footprint
- Previous scheme (option A) ground floor footprint

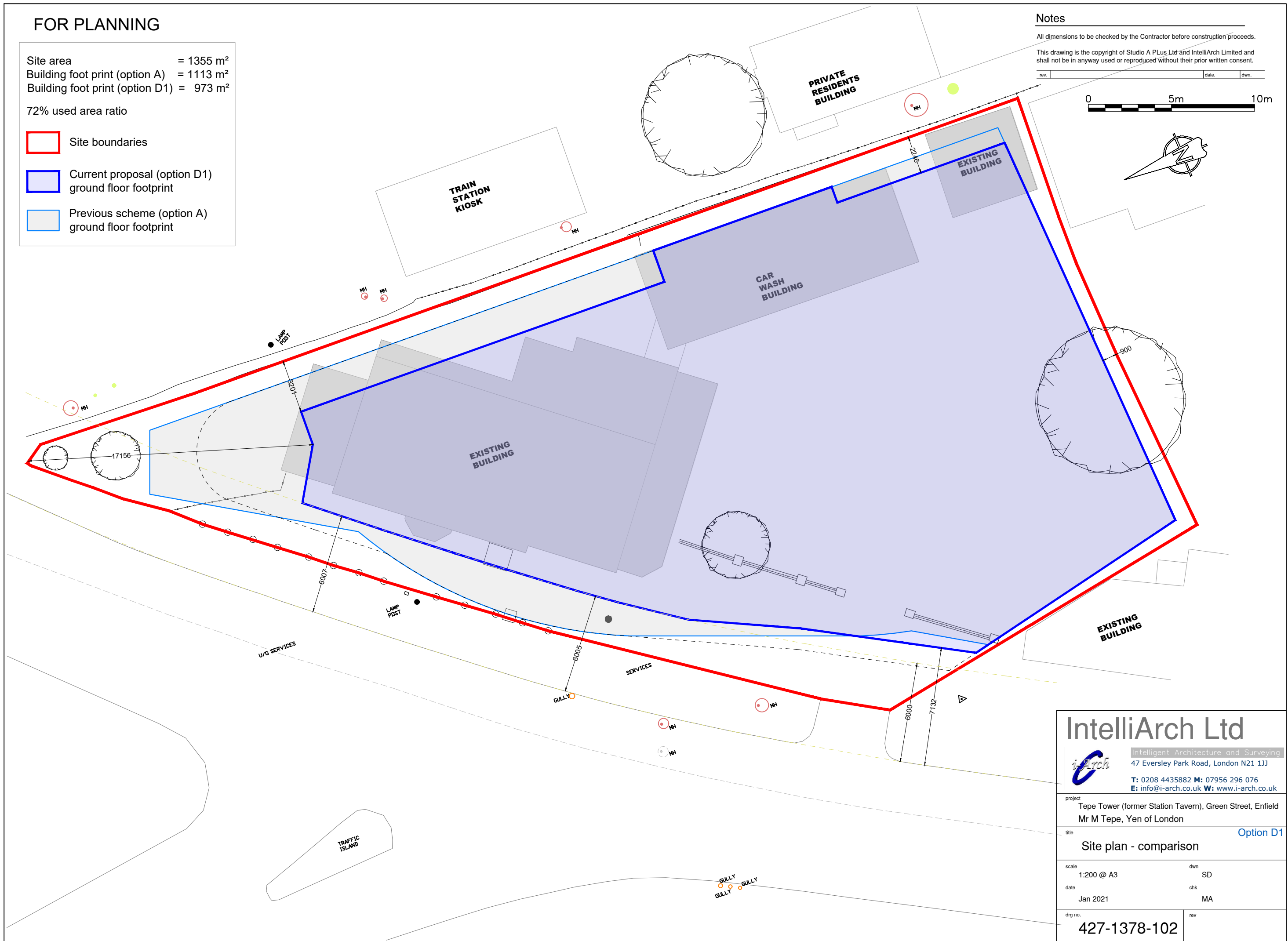
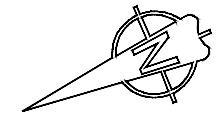
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0 5m 10m



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project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

title
 Site plan - comparison Option D1

scale
 1:200 @ A3
 date
 Jan 2021

dwn SD
 chik MA

drwg no.
 427-1378-102

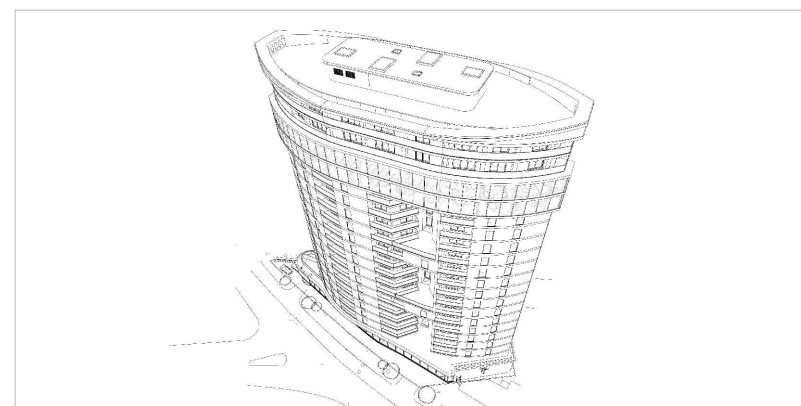
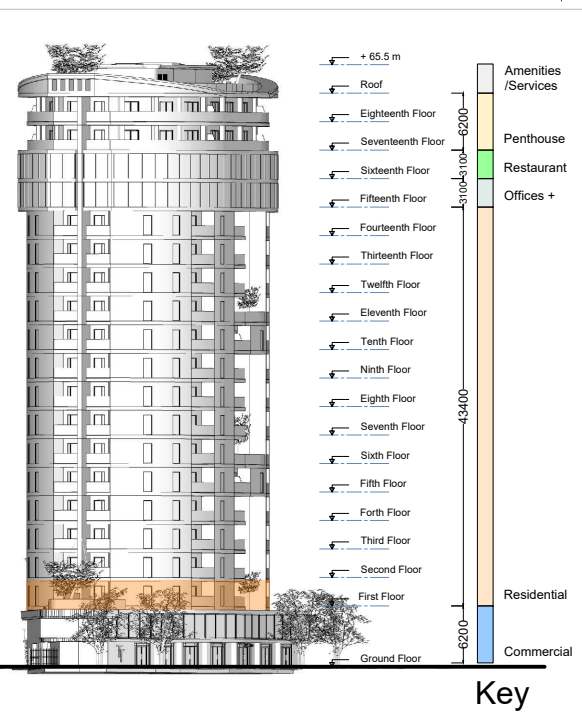
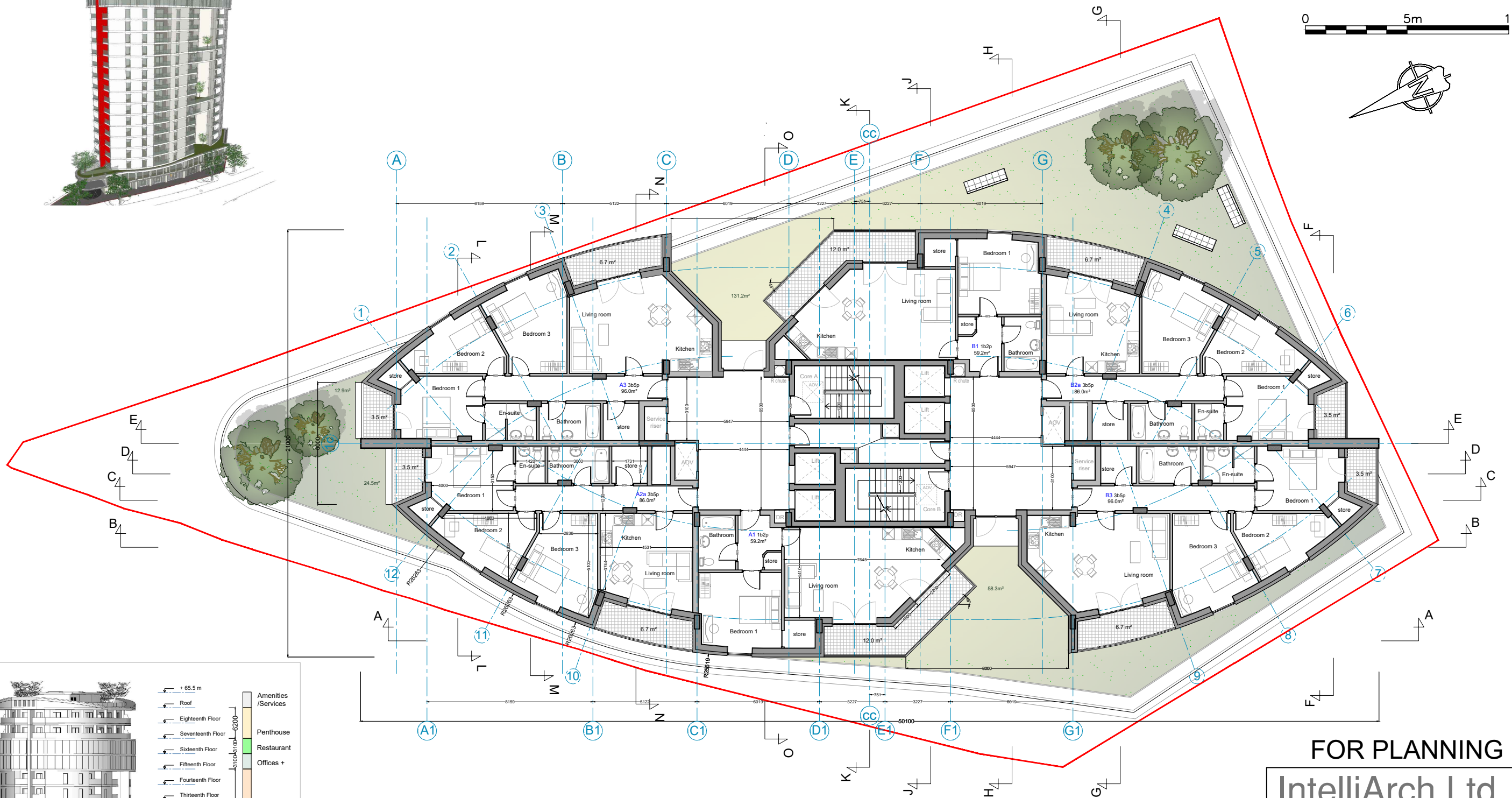
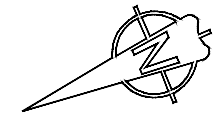
rev

Notes

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Conceptual 3d views

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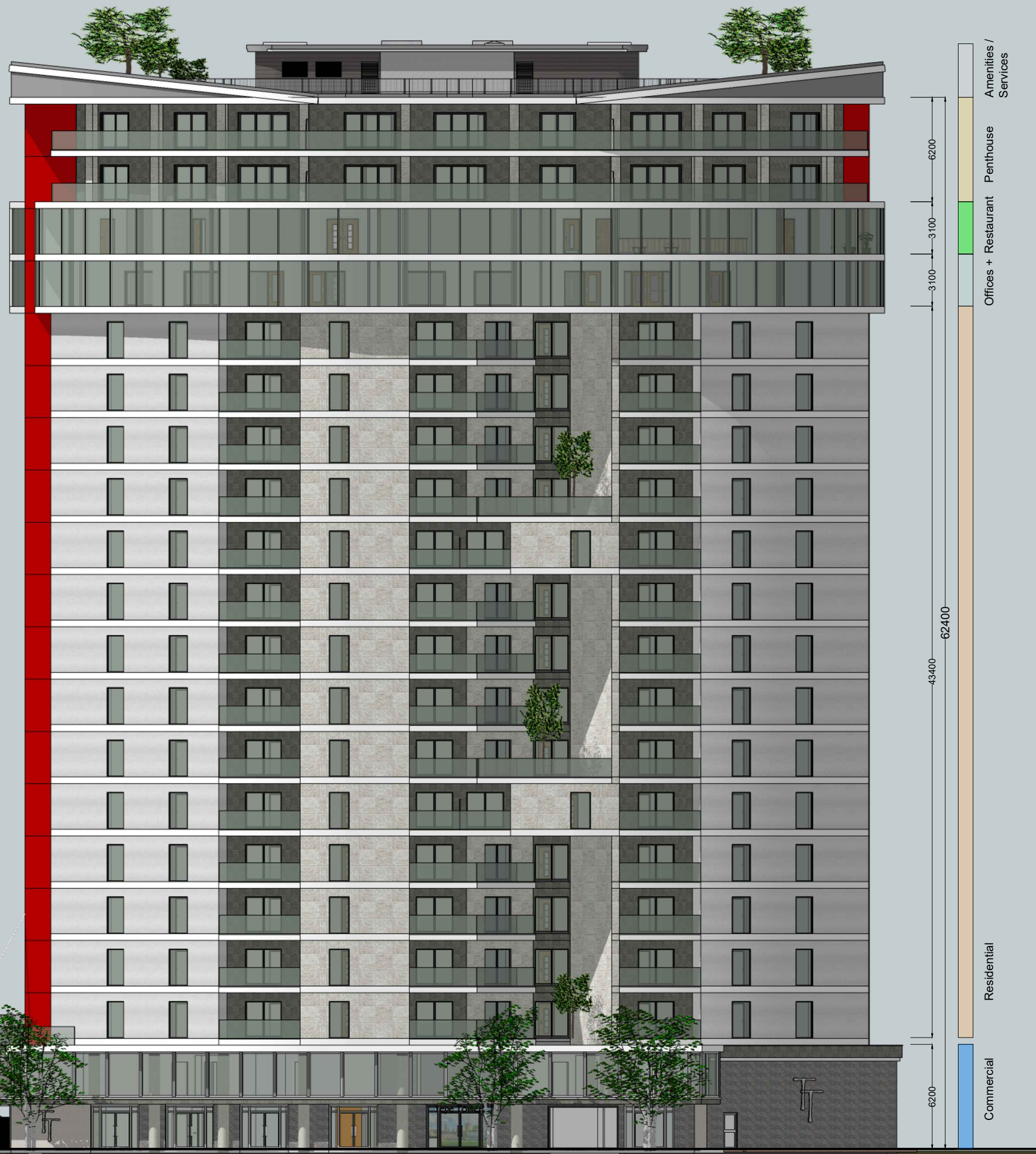


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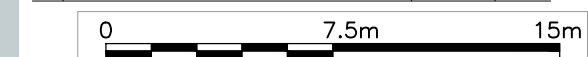
project	Tepe Tower (former Station Tavern), Green Street, Enfield Mr M Tepe, Yen of London		
title	Residential floor plan (1st floor)	Option D1	
scale	1:200 @ A3	dwn	SD
date	Jan 2021	chk	MA
drg no.	427-1378-113	rev	

FOR PLANNING
North-West Elevation







- ▽ +62.4 m Roof
- ▽ +59.3 m Eighteenth Floor
- ▽ +56.2 m Seventeenth Floor
- ▽ +53.1 m Sixteenth Floor
- ▽ +50.0 m Fifteenth Floor
- ▽ +46.9 m Fourteenth Floor
- ▽ +43.8 m Thirteenth Floor
- ▽ +40.7 m Twelfth Floor
- ▽ +37.6 m Eleventh Floor
- ▽ +34.5 m Tenth Floor
- ▽ +31.4 m Ninth Floor
- ▽ +28.3 m Eighth Floor
- ▽ +25.2 m Seventh Floor
- ▽ +22.1 m Sixth Floor
- ▽ +19.0 m Fifth Floor
- ▽ +15.9 m Forth Floor
- ▽ +12.8 m Third Floor
- ▽ +9.7 m Second Floor
- ▽ +6.6 m First Floor
- ▽ ~15.6 m = 0.0 m

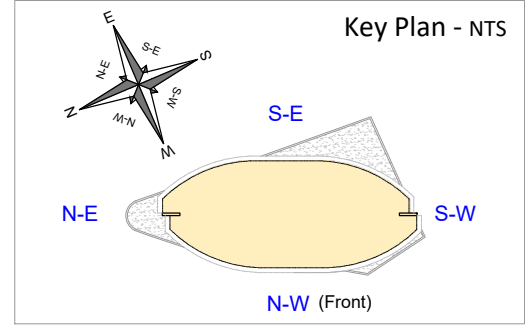


Notes
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Note:
All materials shown on the CGIs are for illustrative purpose only as the textures and colours could potentially differ from the real ones.
Please refer to the schedule of materials in the D&A appendix 1 for more details

-  Aluminium cladding (varies shades)
-  Glazing facade system
-  Structural glass balustrades
-  Metal-stone cladding
-  Brick finish
-  Stone finish



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E: info@i-arch.co.uk W: www.i-arch.co.uk

project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Front elevation Option D1

scale
1:250 @ A3
date
Jan 2021
dwn
SD
chk

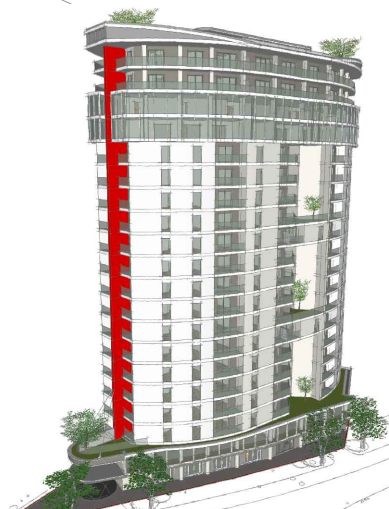
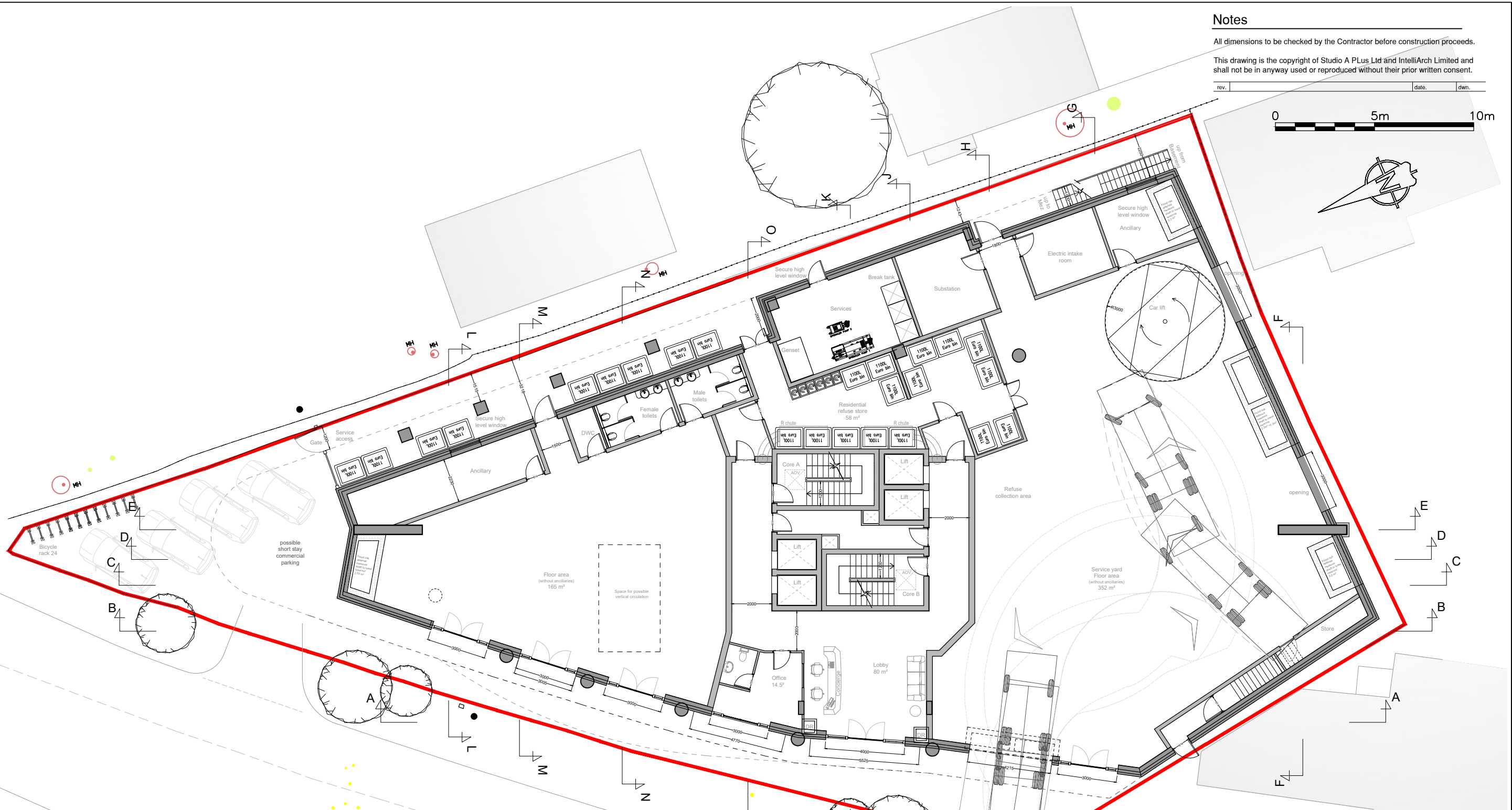
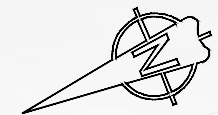
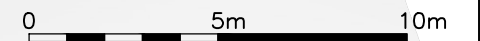
drg no.
427-1378-121
rev

Notes

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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Ground floor plan Option D1

scale
1:200 @ A3
date
Jan 2021

dwn
SD
chk
MA

drg no.
427-1378-111

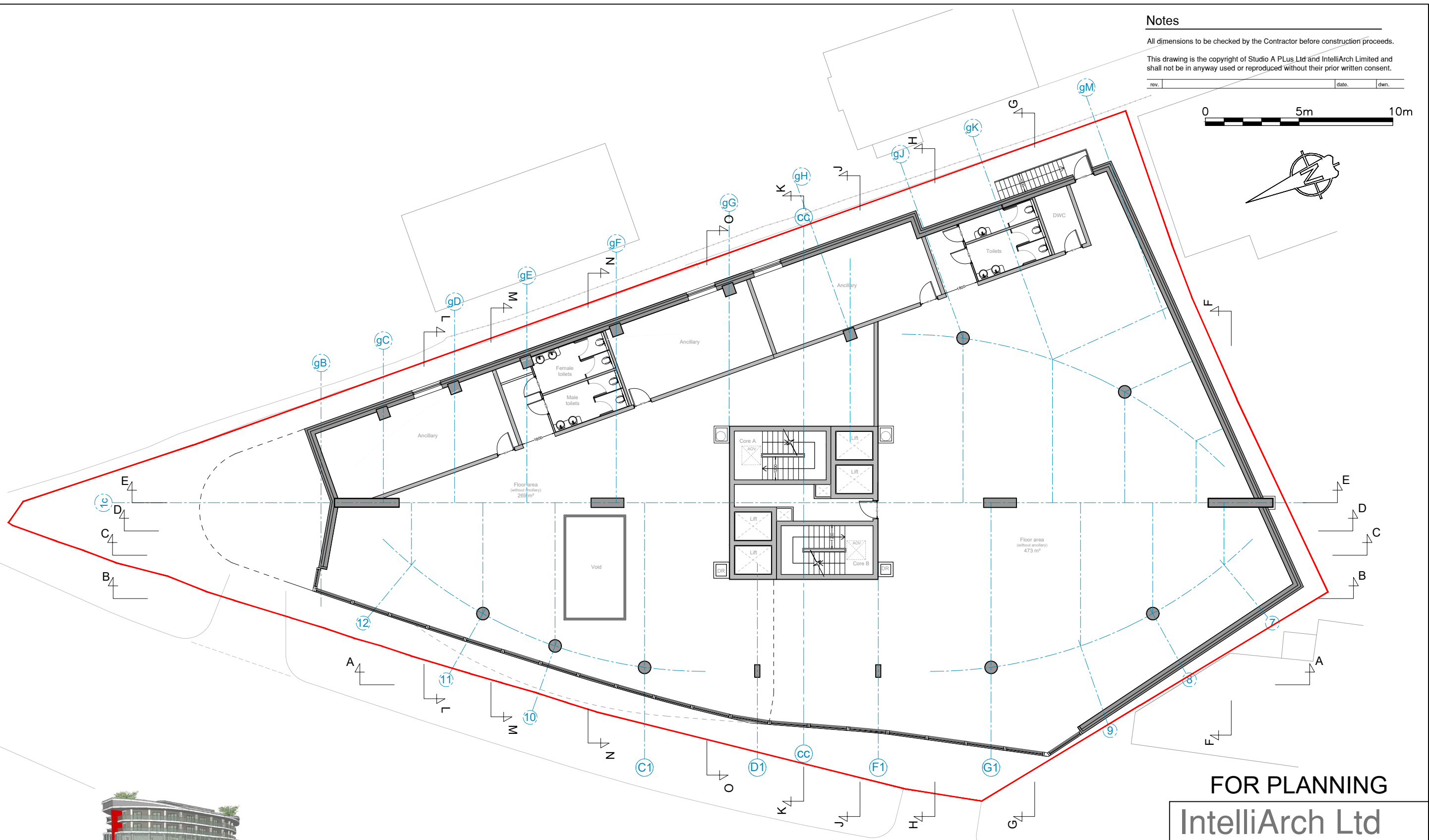
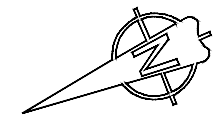
rev

Notes

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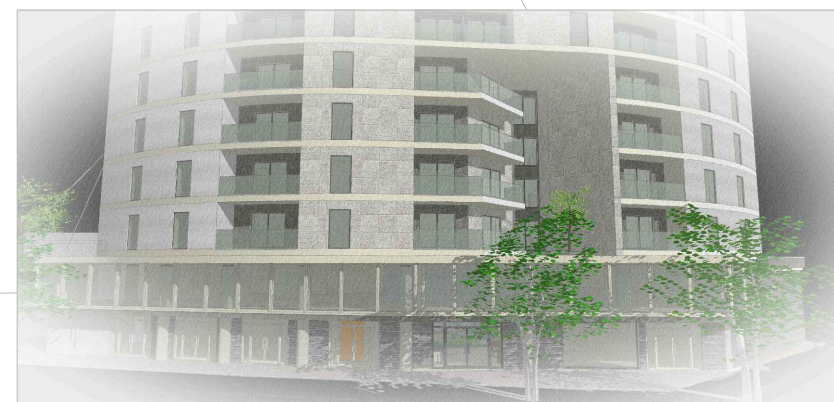
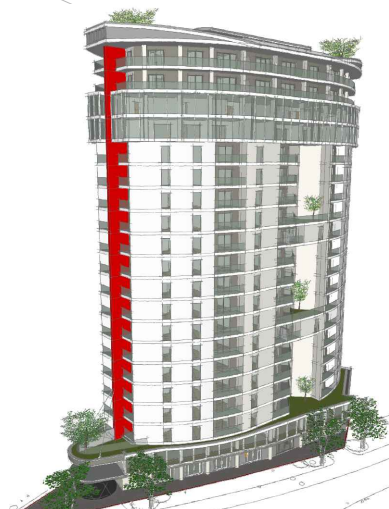
Intelligent Architecture and Surveying
47 Eversley Park Road, London N21 1JJ
T: 0208 4435882 M: 07956 296 076
E: info@i-arch.co.uk W: www.i-arch.co.uk

project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Mezzanine floor plan Option D1

scale 1:200 @ A3	dwn SD
date Jan 2021	chk MA

drg no. 427-1378-112	rev
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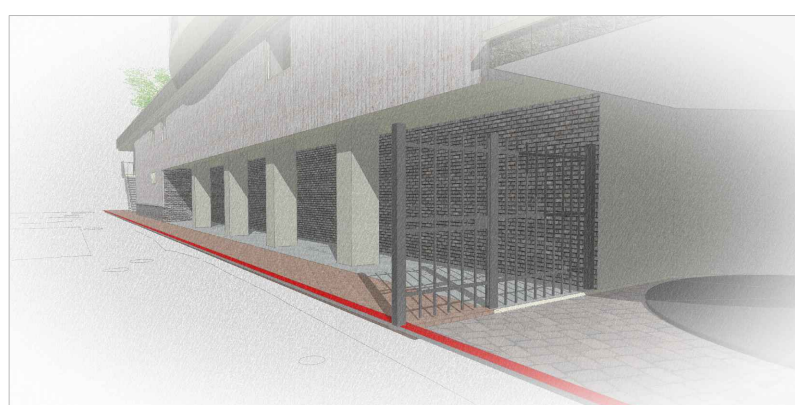
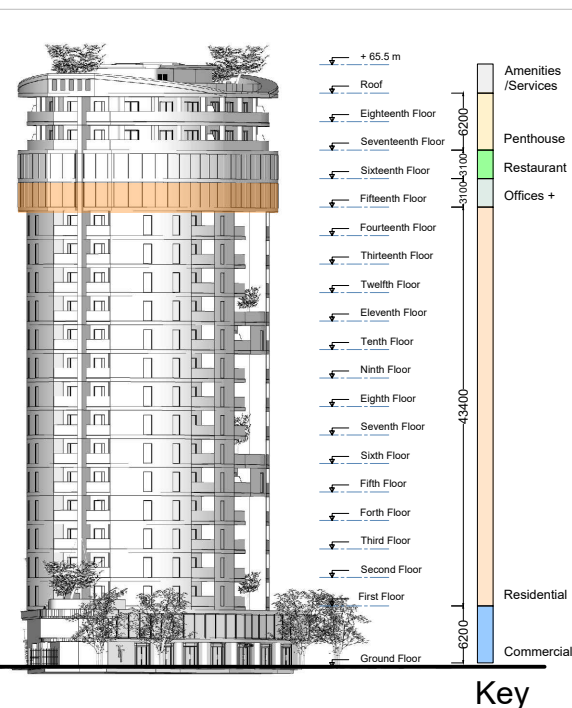
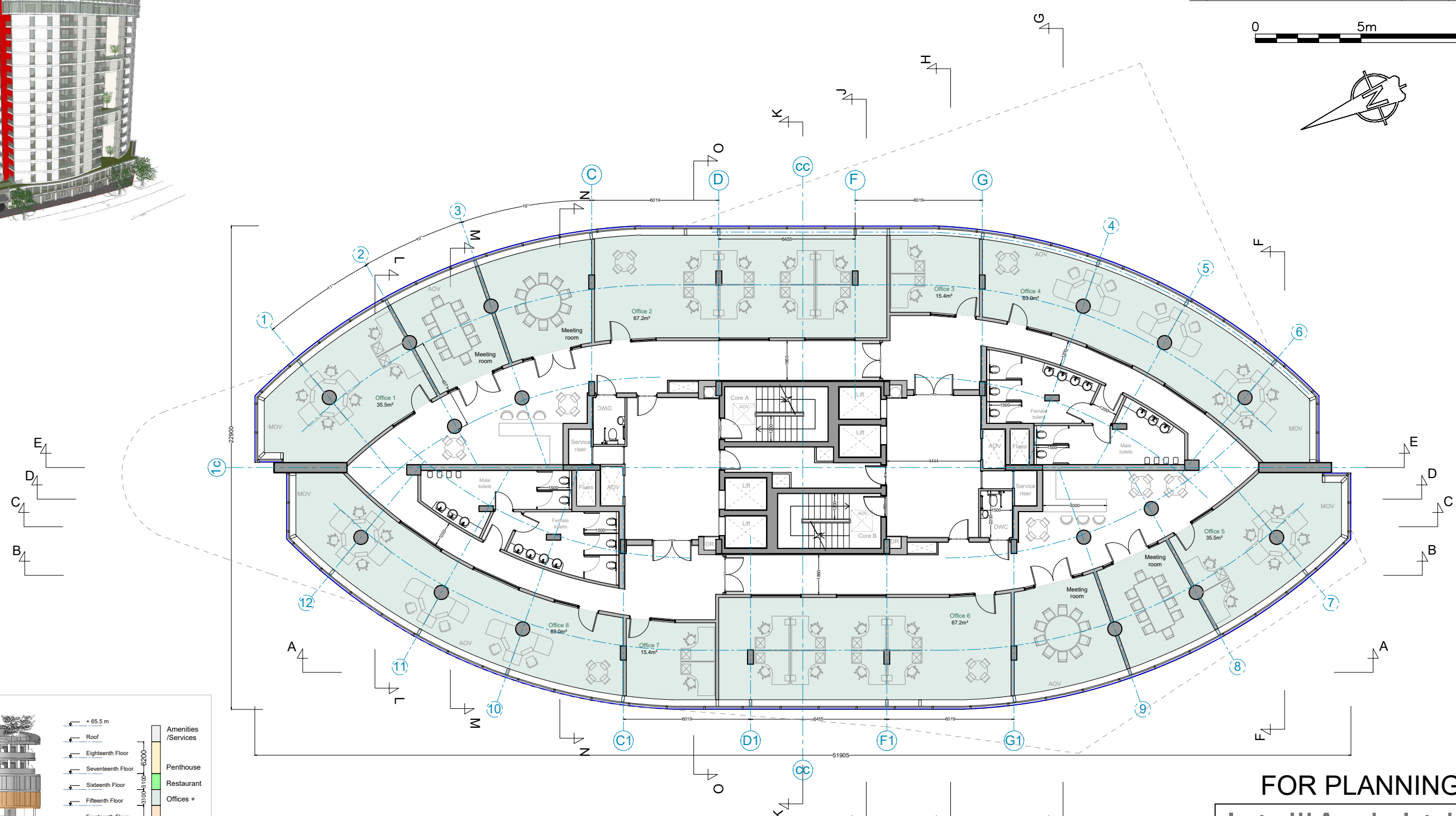
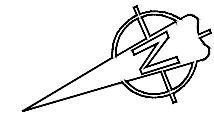
Conceptual 3d views

Notes

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Conceptual 3d views

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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Office floor plan (15th) Option D1

scale
1:200 @ A3
date
Jan 2021

dwn SD
chk MA

drwg no.
427-1378-117

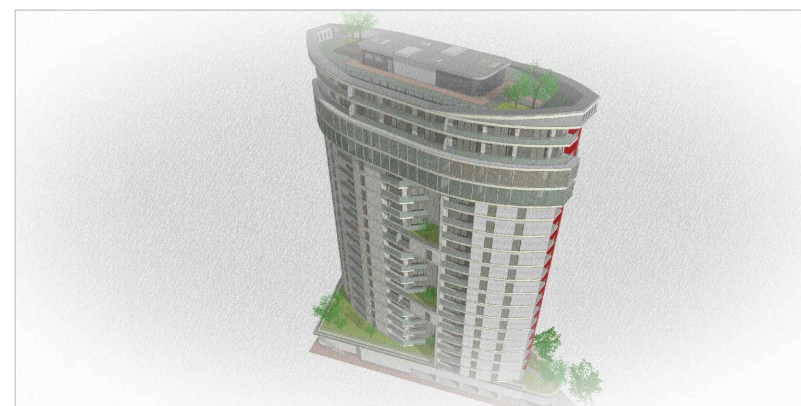
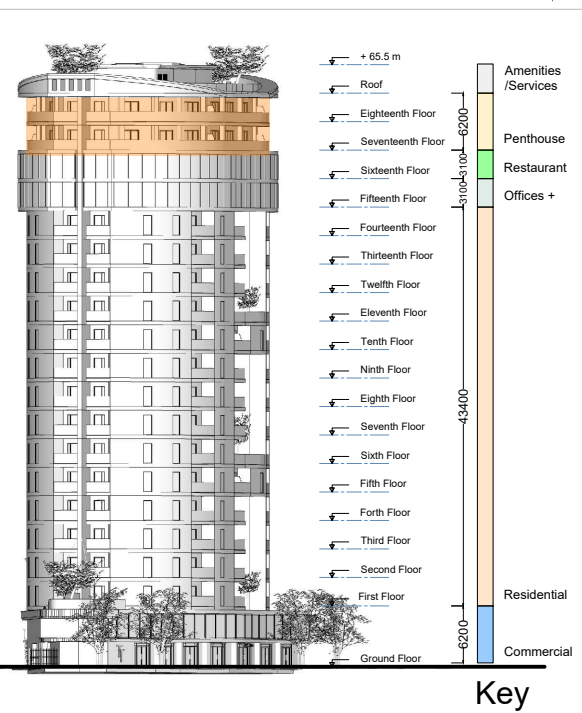
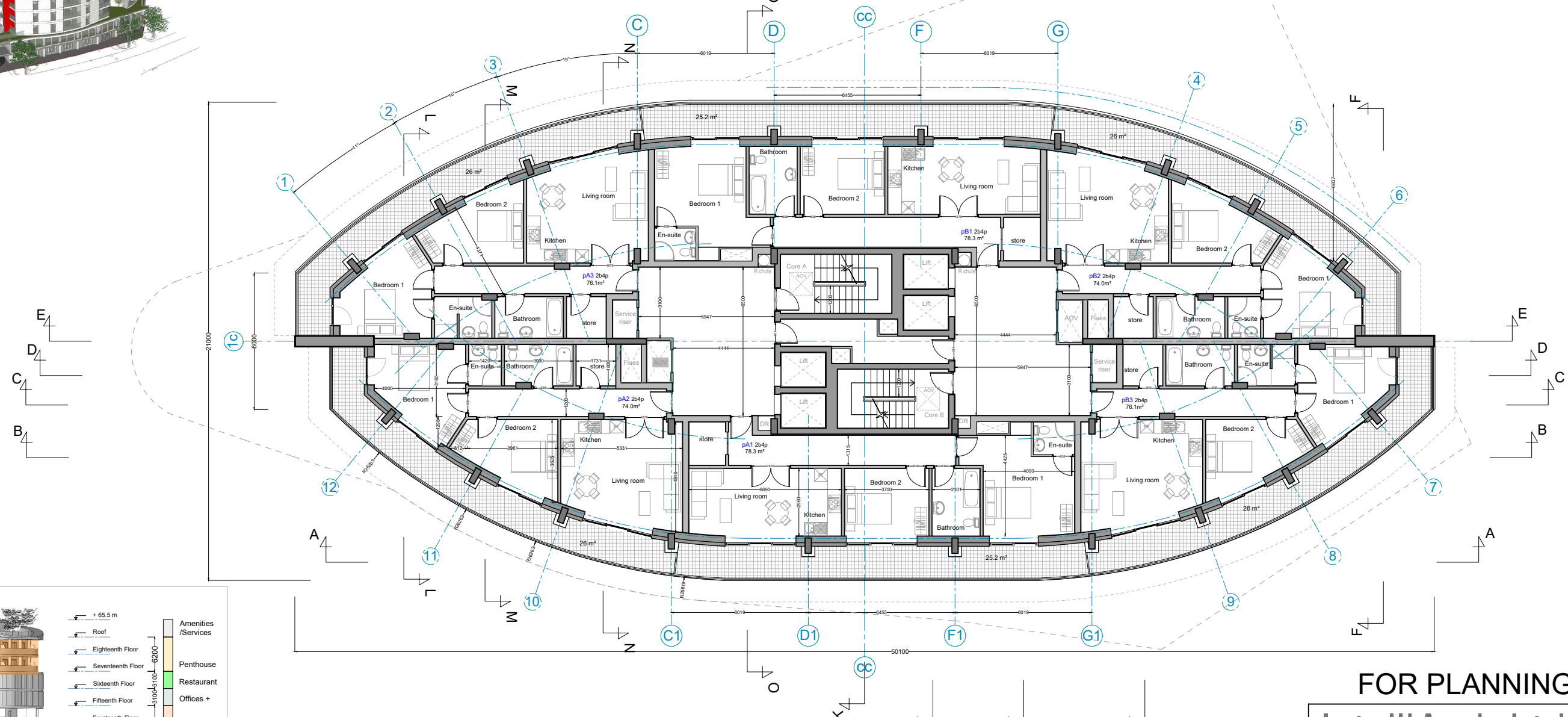
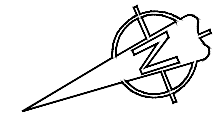
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Conceptual 3d views

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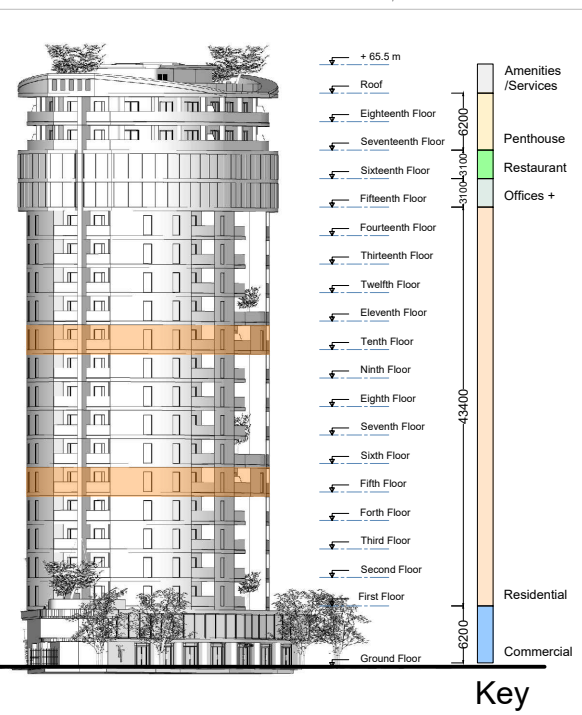
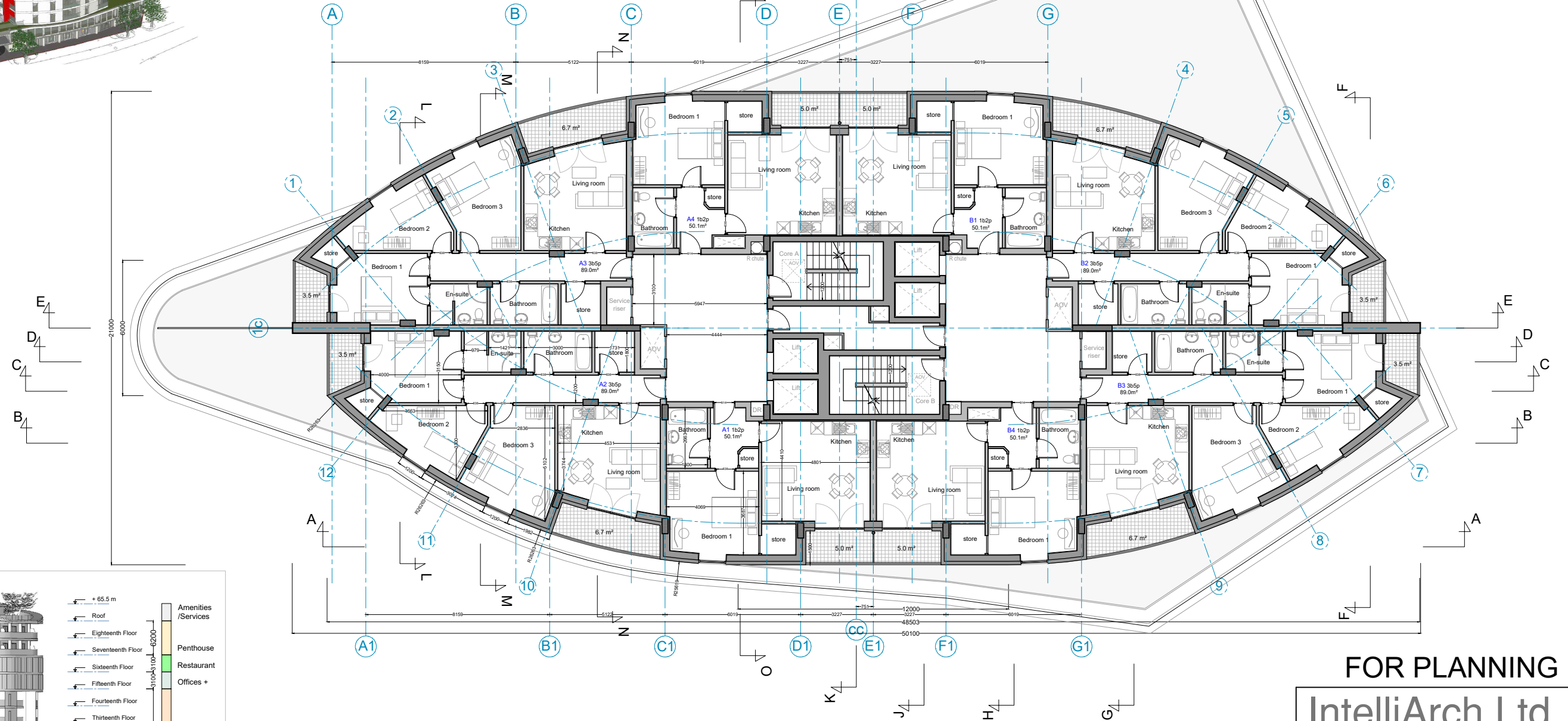
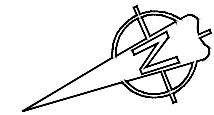
project	Tepe Tower (former Station Tavern), Green Street, Enfield Mr M Tepe, Yen of London		
title	Penthouse floor plan (17th and 18th floor) Option D1		
scale	1:200 @ A3	dwn	SD
date	Jan 2021	chk	MA
drg no.	427-1378-119	rev	

Notes

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rev. _____ date _____ dwn. _____



Conceptual 3d views

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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Residential floor plan (5th and 10th) Option D1

scale
1:200 @ A3
date
Jan 2021
dwn
SD
chik
MA

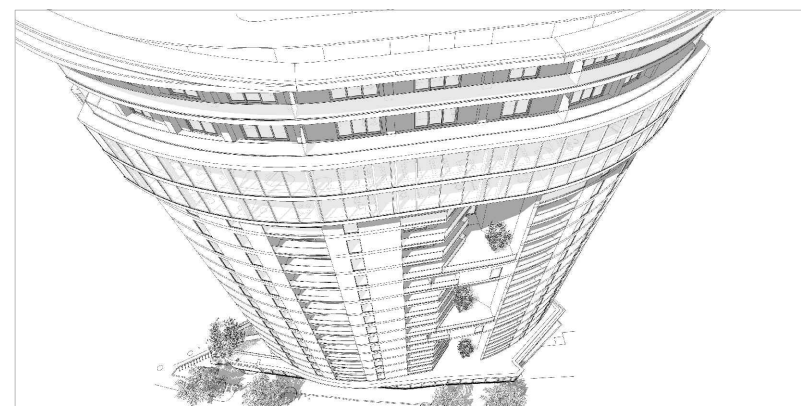
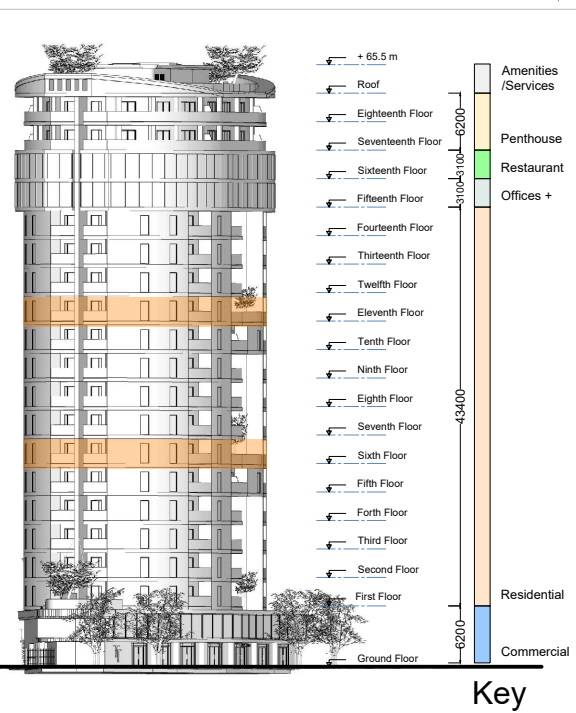
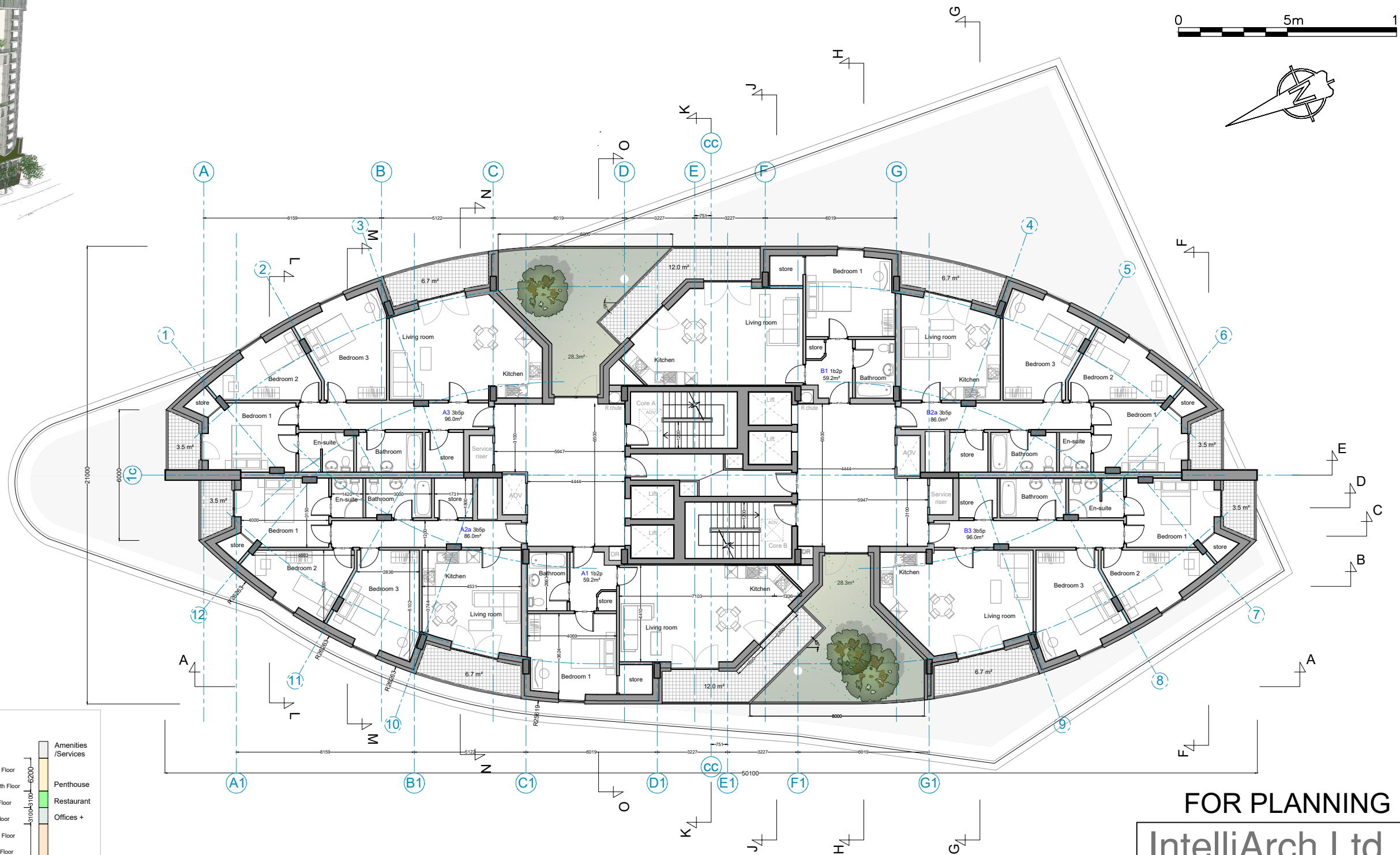
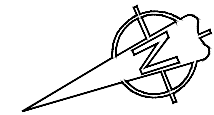
drwg no.
427-1378-115
rev

Notes

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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Residential floor plan (6th and 11th) Option D1

scale
1:200 @ A3
date
Jan 2021

dwn
SD
chk
MA

drwg no.
427-1378-116

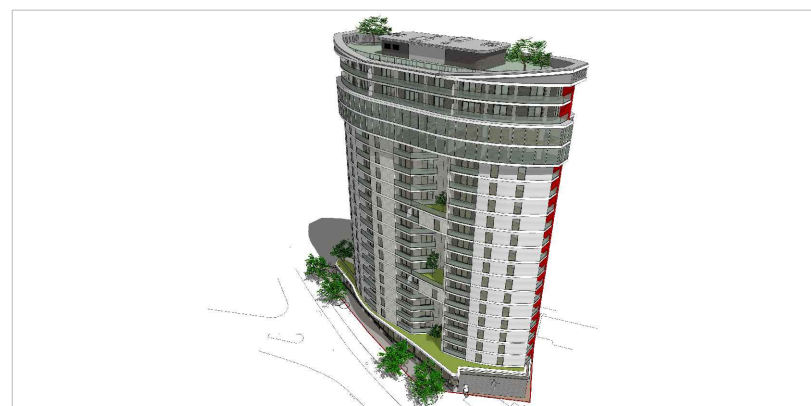
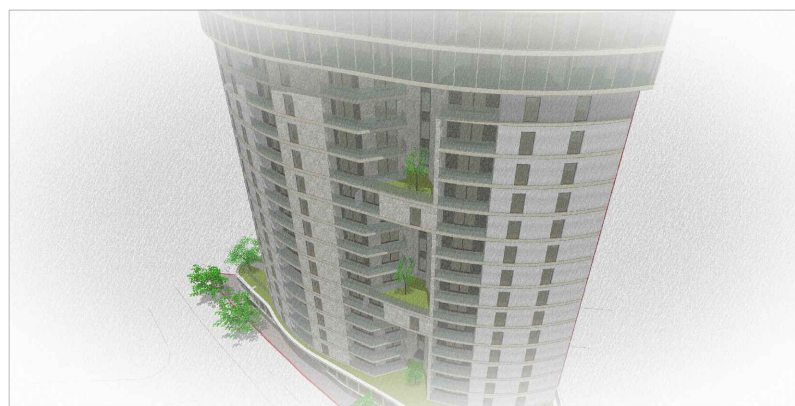
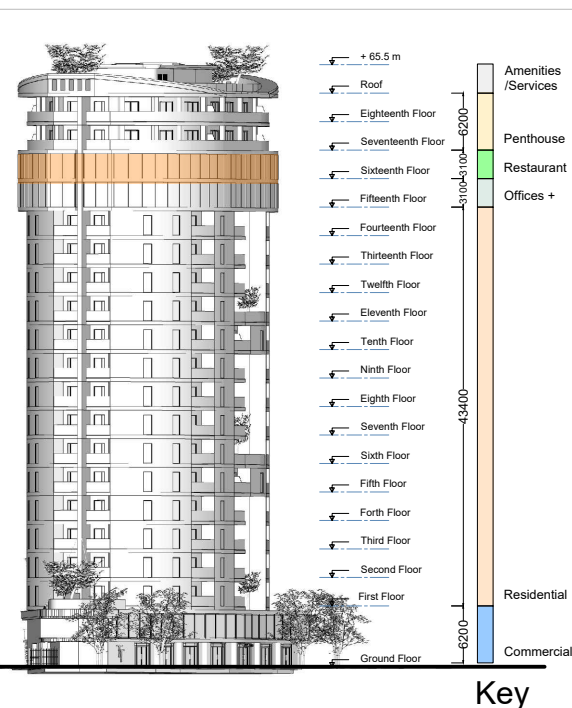
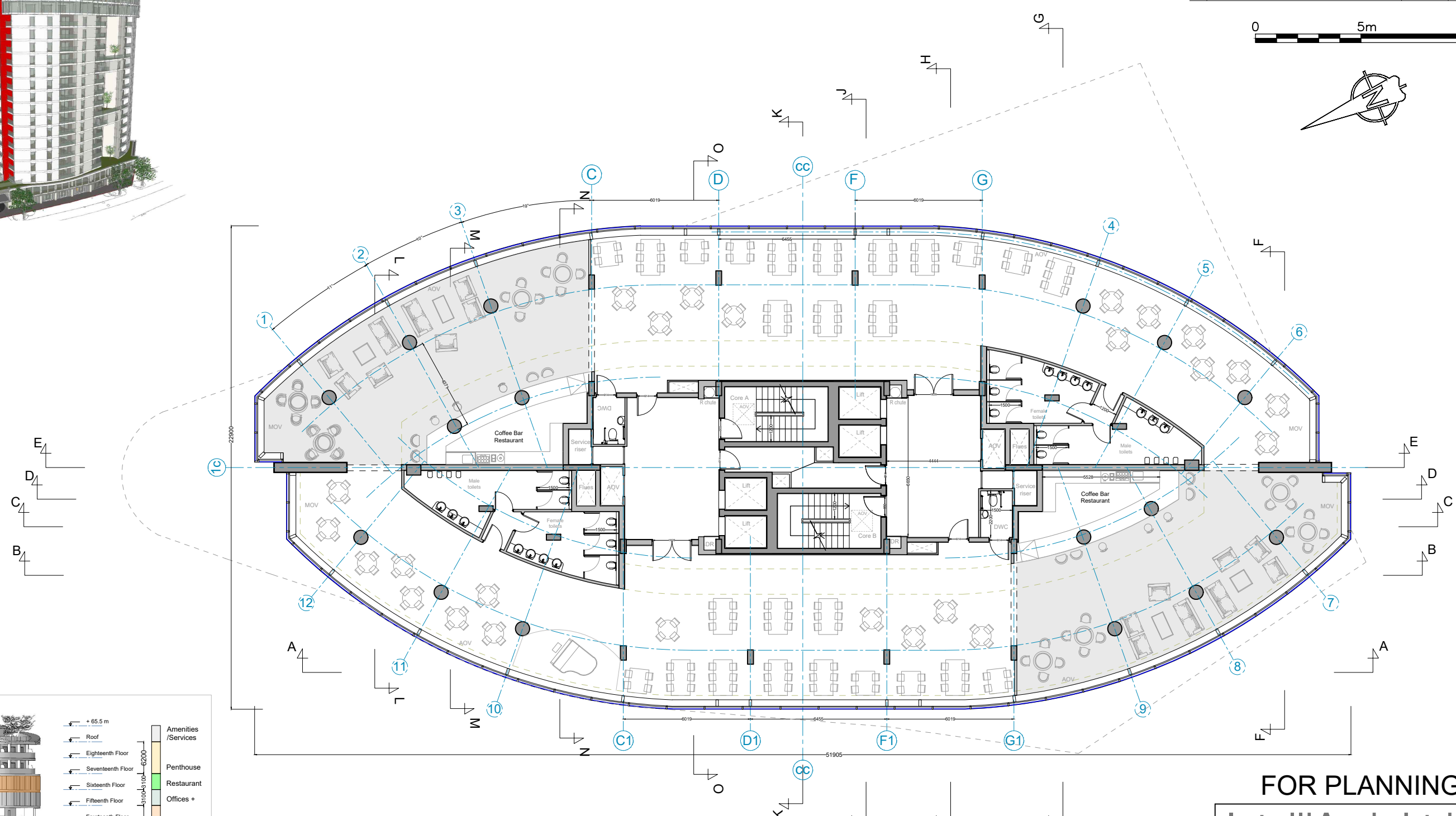
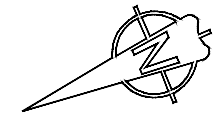
rev

Notes

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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Restaurant floor plan (16th floor) Option D1

scale
1:200 @ A3
date
Jan 2021

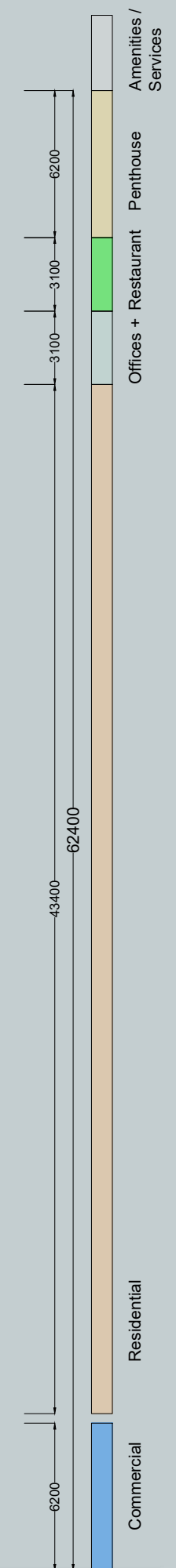
dwn
SD
chk
MA

drg no.
427-1378-118

rev

FOR PLANNING
North-East Elevation

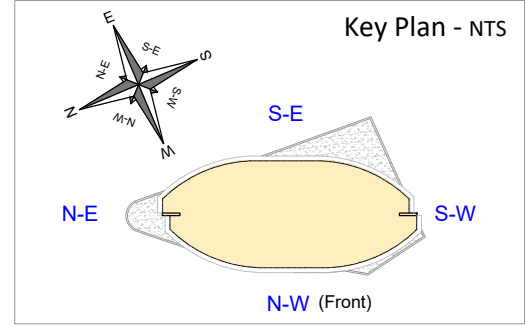
- + 62.4 m Roof
- + 59.3 m Eighteenth Floor
- + 56.2 m Seventeenth Floor
- + 53.1 m Sixteenth Floor
- + 50.0 m Fifteenth Floor
- + 46.9 m Fourteenth Floor
- + 43.8 m Thirteenth Floor
- + 40.7 m Twelfth Floor
- + 37.6 m Eleventh Floor
- + 34.5 m Tenth Floor
- + 31.4 m Ninth Floor
- + 28.3 m Eighth Floor
- + 25.2 m Seventh Floor
- + 22.1 m Sixth Floor
- + 19.0 m Fifth Floor
- + 15.9 m Forth Floor
- + 12.8 m Third Floor
- + 9.7 m Second Floor
- + 6.6 m First Floor
- ~15.6 m = 0.0 m



Notes
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rev. | date. | dwn.
0 7.5m 15m
Note:
All materials shown on the CGIs are for illustrative purpose only as the textures and colours could potentially differ from the real ones.
Please refer to the schedule of materials in the D&A appendix 1 for more details

- Aluminium cladding (varies shades)
- Glazing facade system
- Structural glass balustrades
- Metal-stone cladding
- Brick finish
- Stone finish



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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Side elevation Option D1

scale
1:250 @ A3
dwn SD
date
Jan 2021
chk

drg no.
427-1378-122
rev

FOR PLANNING

South-West Elevation

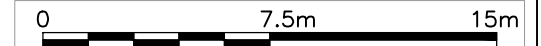


Notes

All dimensions to be checked by the Contractor before construction proceeds.

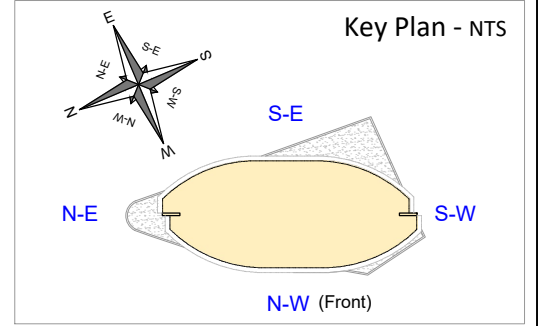
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rev.	date	dwn.



Note:
 All materials shown on the CGIs are for illustrative purpose only as the textures and colours could potentially differ from the real ones.
 Please refer to the schedule of materials in the D&A appendix 1 for more details

- Aluminium cladding (varies shades)
- Glazing facade system
- Structural glass balustrades
- Metal-stone cladding
- Brick finish
- Stone finish



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project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

title
 Side elevation Option D1

scale
 1:250 @ A3
 date
 Jan 2021

dwn SD
 chk

drwg no.
427-1378-124

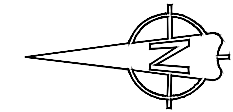
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Notes


All dimensions to be checked by the Contractor before construction proceeds.

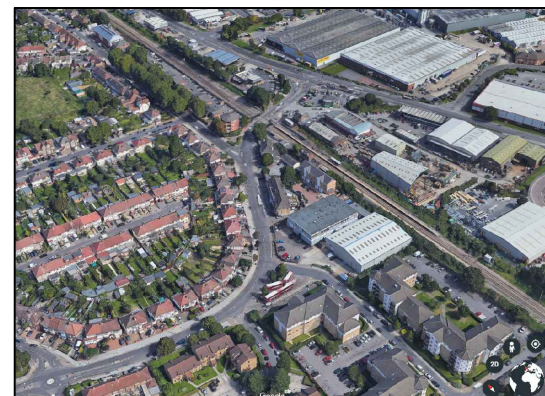
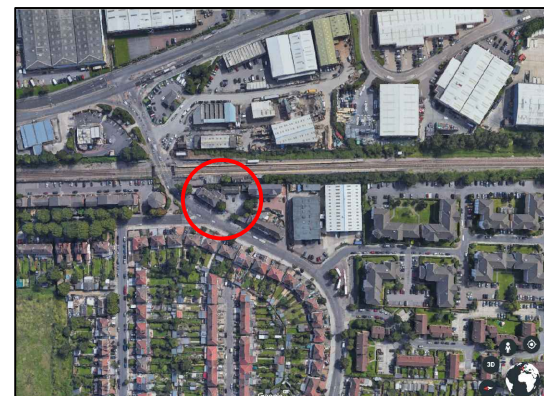
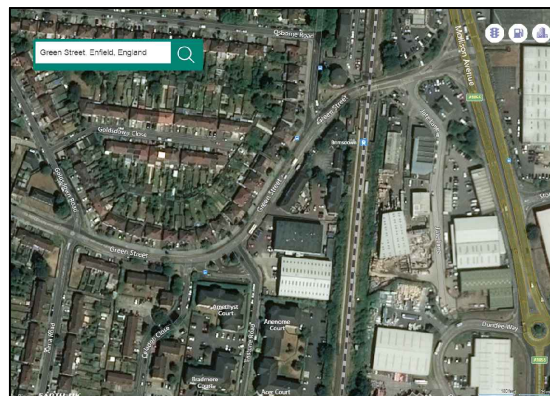
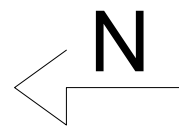
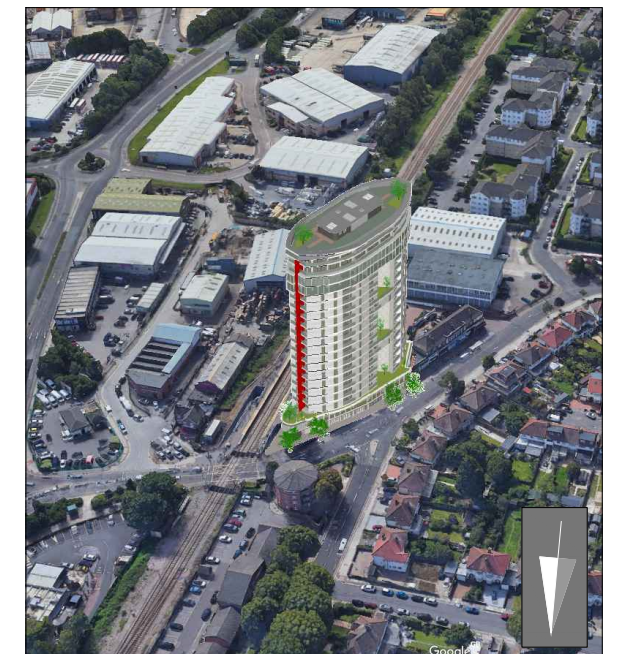
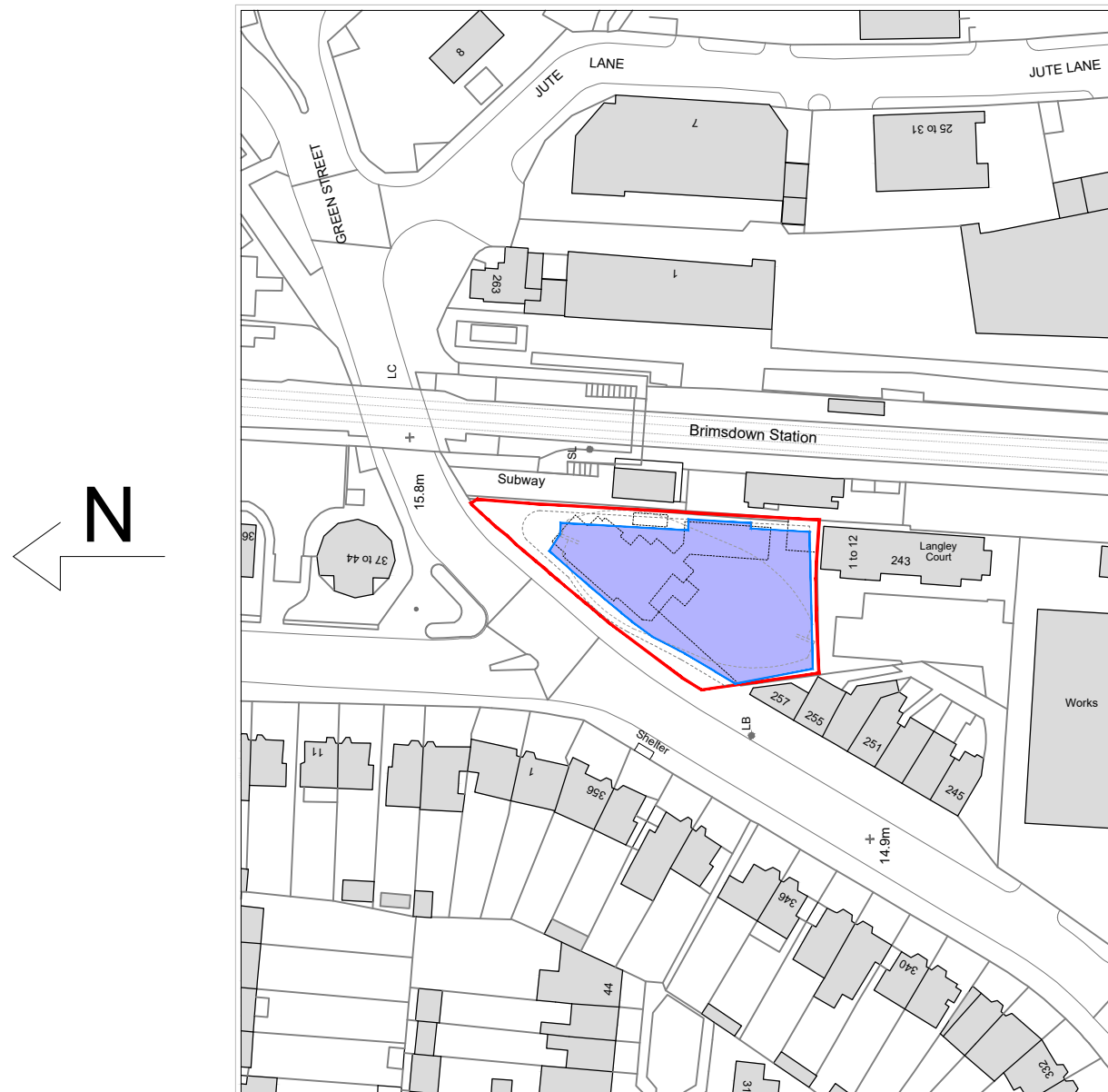
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 Site Boundaries

 Proposed Building footprint



Google aerial views

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project
The Station Tavern, Green Street
Enfield EN3 7SH

title
Block plan with proposal

Option D1

scale
1:1250 @ A3

dwn
SD

date
Jan 2021

chk
MA

drg no.
427-1378-002

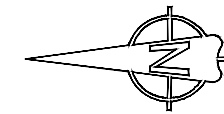
rev


Notes


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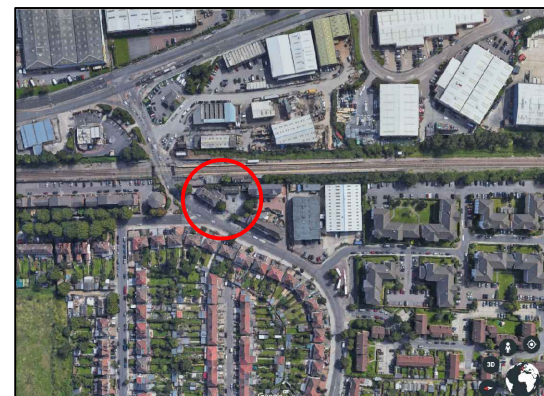
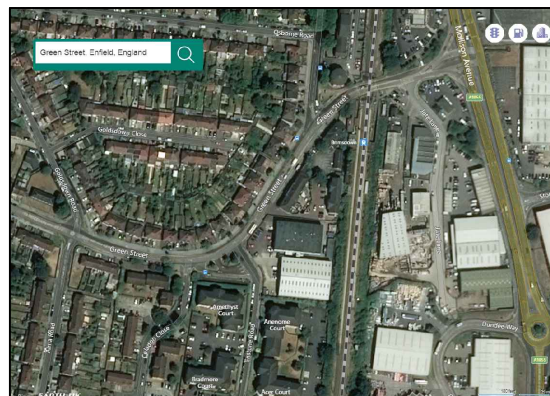
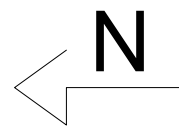
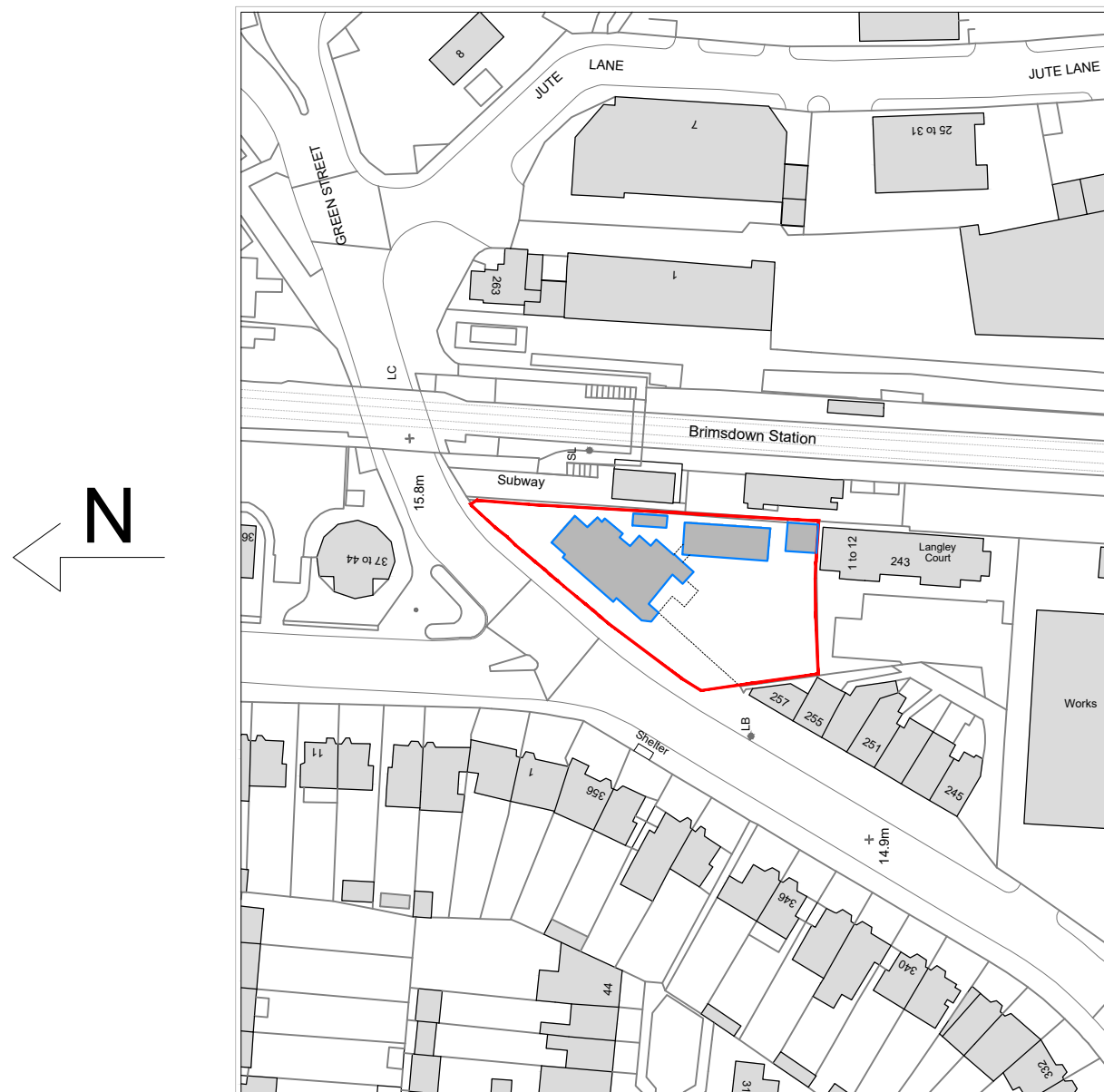
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rev.	date.	dwn.
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 Site Boundaries

 Existing buildings



Google aerial views

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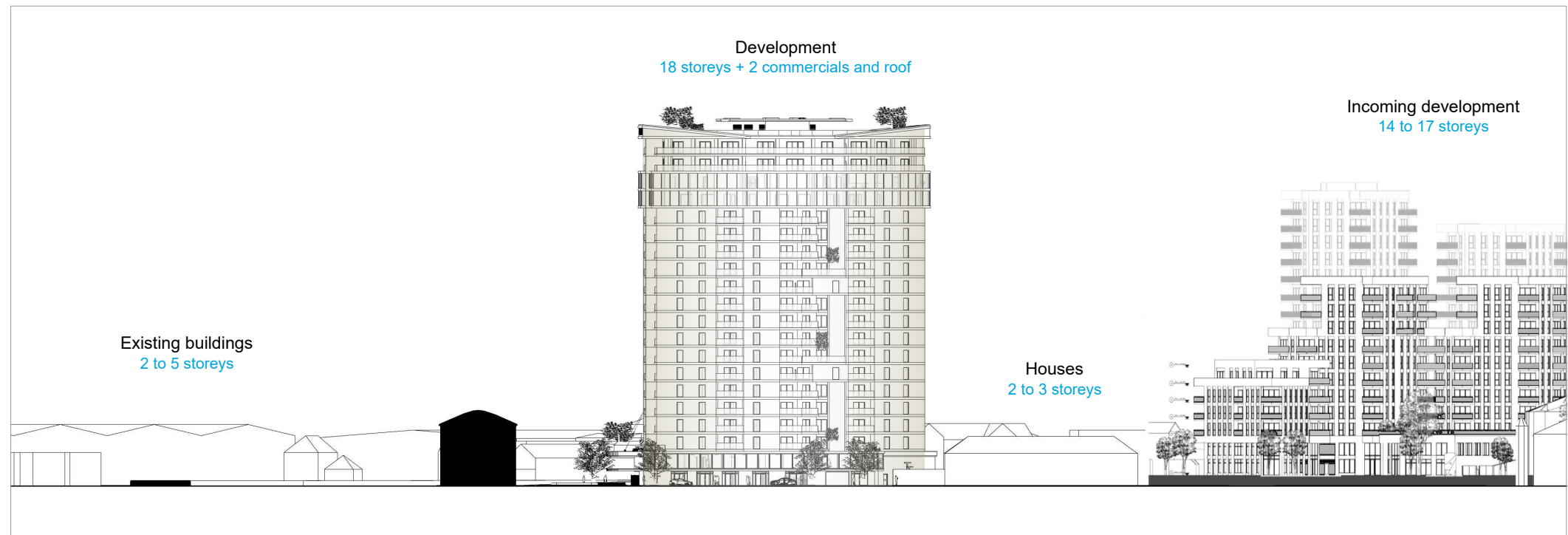
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E: info@i-arch.co.uk W: www.i-arch.co.uk

project
The Station Tavern, Green Street
Enfield EN3 7SH

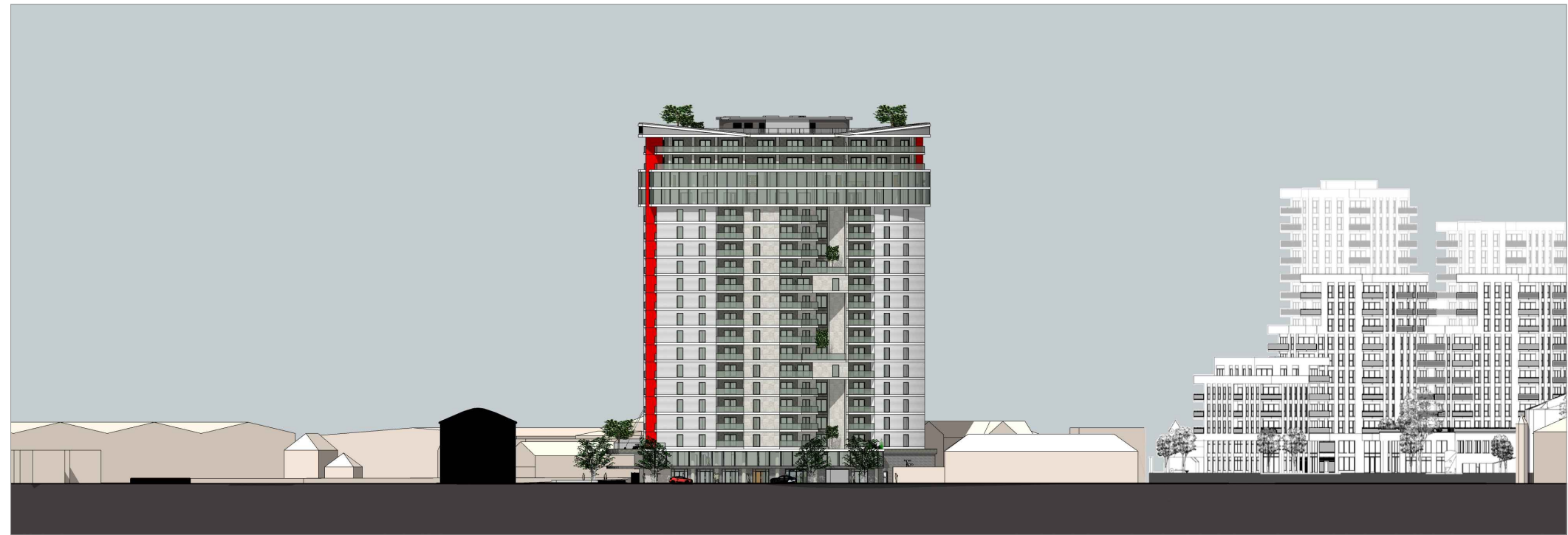
title
Site plan

scale 1:1250 @ A3	dwn SD
date Jan 2021	chk MA

drg no. 427-1378-001	rev
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Street scene - scale 1:1000



Street scene - scale 1:1000



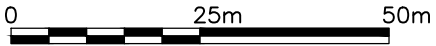
Reference plan - scale 1:2500

Notes

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 E: info@i-arch.co.uk W: www.i-arch.co.uk

project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

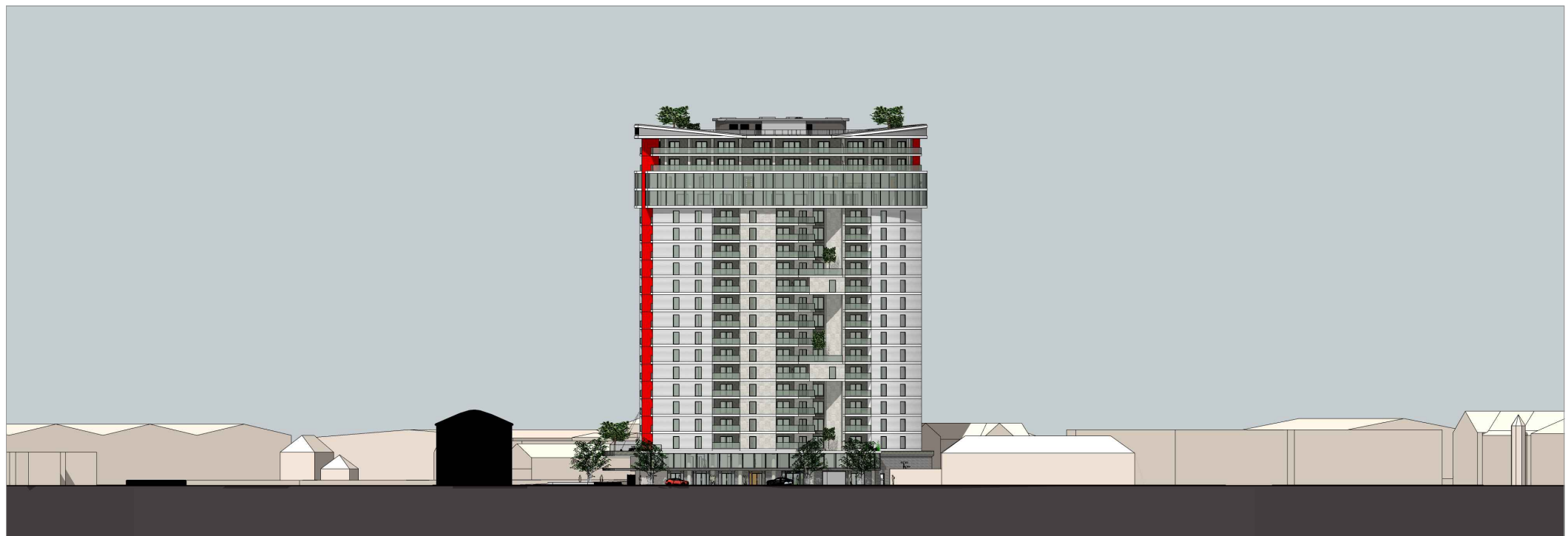
title
 Street scene Option D1

scale	1:1000 @ A3	dwn	SD
date	Apr 2021	chk	MA

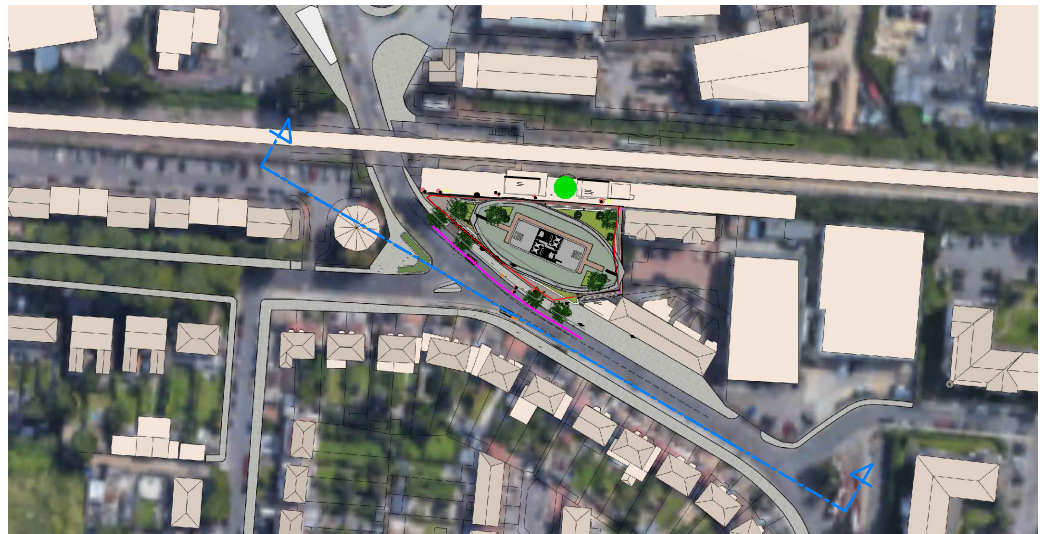
drg no.	427-1378-141	rev	
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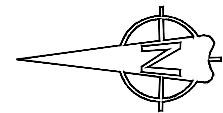
Street scene - scale 1:1000



Street scene - scale 1:1000



Reference plan - scale 1:2500

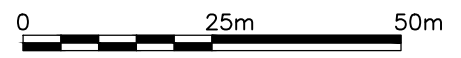


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project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

title
 Street scene Option D1

scale	1:1000 @ A3	dwn	SD
date	Apr 2021	chk	MA

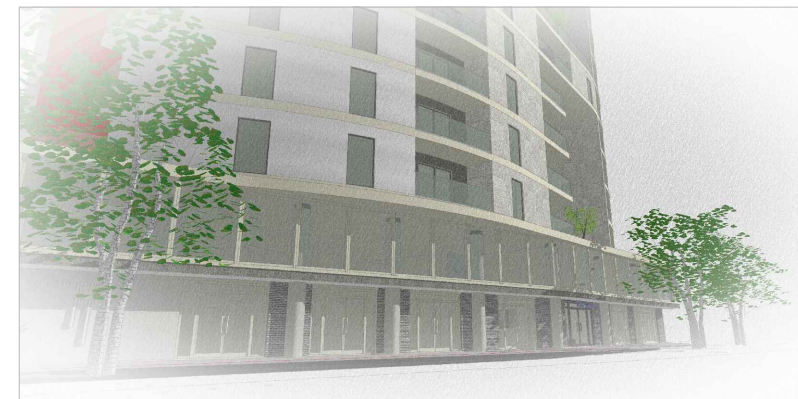
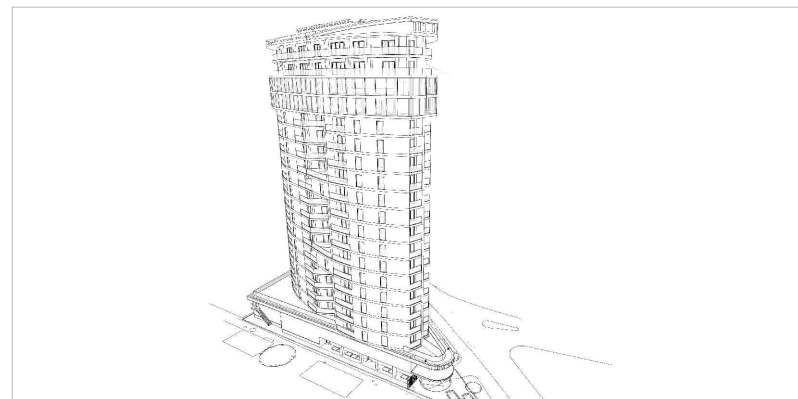
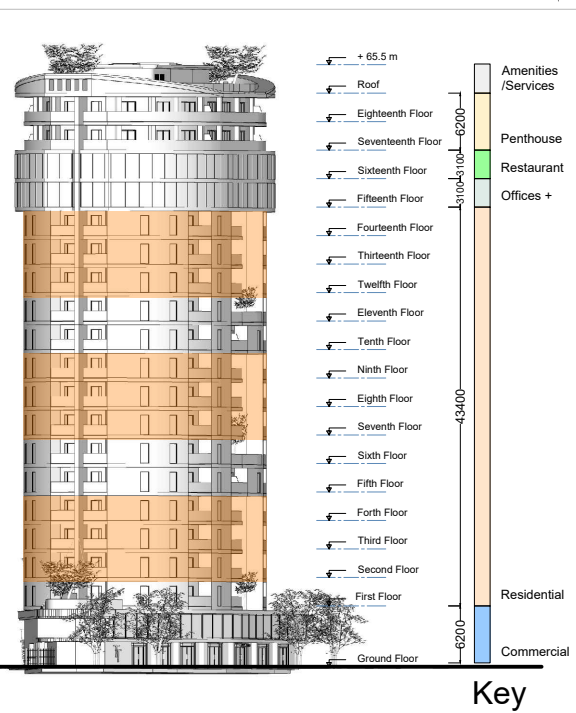
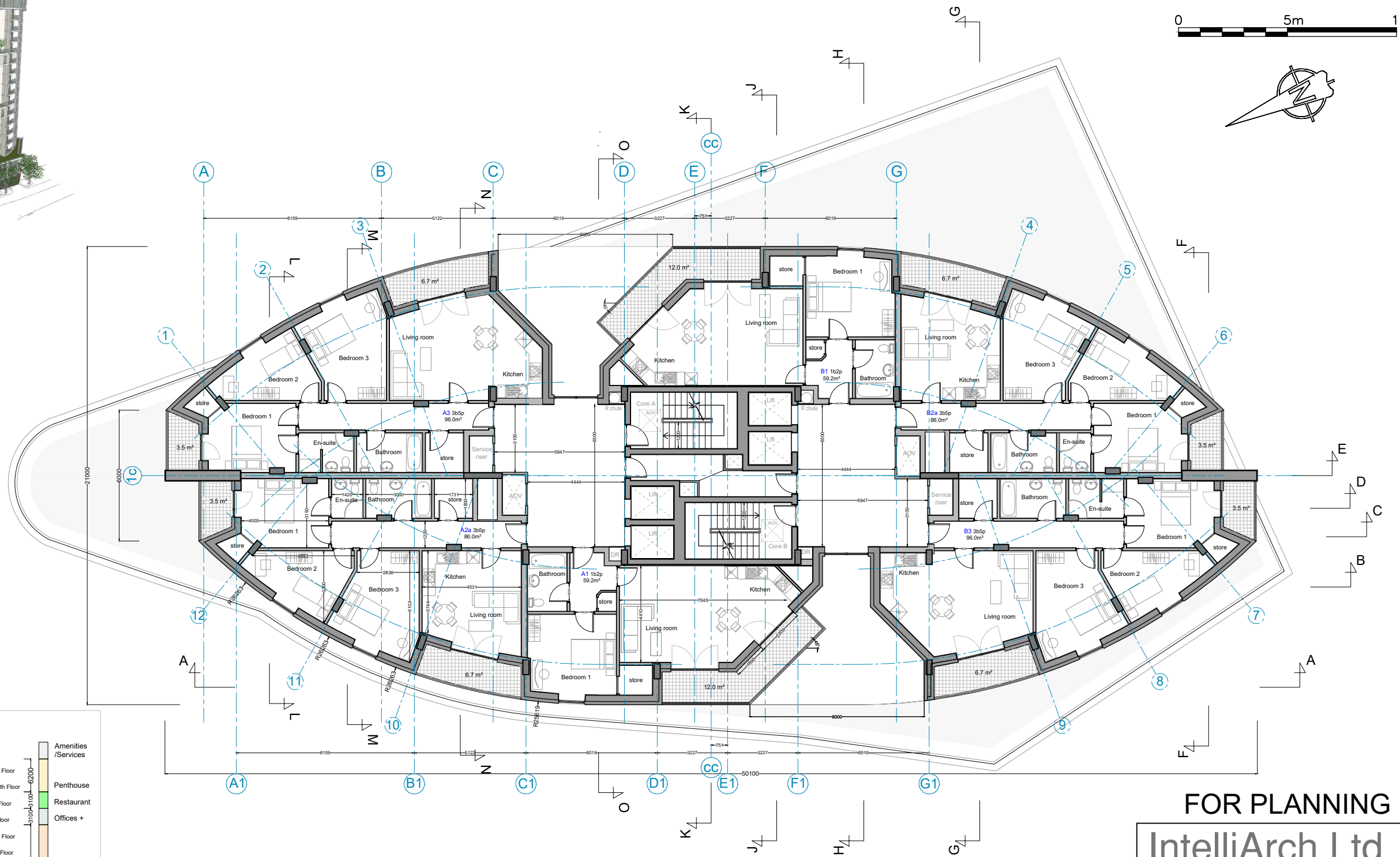
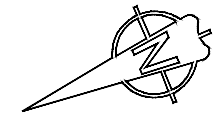
drg no.	427-1378-140	rev	
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Notes

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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Typical residential floor plan (2,3,4-7,8,9-12,13,14) **Option D1**

scale
1:200 @ A3
date
Jan 2021

dwn
SD
chk
MA

drg no.
427-1378-114

rev

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 18 th October 2022
Report of Head of Planning - Vincent Lacovara	Contact Officers: Andy Higham Sarah Odu/Sharon Davidson	Ward: Upper Edmonton
Application Number: 22/02098/RM		Category: Major
LOCATION: Meridian Water Former Gas Holder Site Leaside Road London N18 (Appendices to this report are published as a separate document)		
PROPOSAL: Details of Reserved Matters (scale, layout, access, external appearance and landscaping) for 274 units in respect of Plot Z02-01 within buildings from 10 to 16 storeys in height pursuant to condition 4 of outline planning permission 19/02718/RE3 dated 31st March 2022 for development of Phase 2 of Meridian Water. Application includes details pursuant to condition 9 (design code compliance), 11 (detailed phasing plan), 15 (Flooding), 23 (Air Quality), 27 (Architectural Detail), 29 (Shopfront/signage strategy for retail/ leisure/ community space), 31 (Green Procurement Plan), 32 (Surface water/infiltration and drainage management plan), 35 (Archaeology), 36 (Schedule of tenure/mix per phase), 37 (Compliance with inclusive access requirements M4(2) (90%) and M4(3) (10%), 39 (Public realm strategy - hard and soft landscaping/traffic calming/ street furniture etc), 43 (Meanwhile security and condition), 47 (Details of biodiverse/green roofs per phase in compliance with Design Code/ongoing maintenance and management), 48 (Biodiversity enhancements per phase), 49 (Energy statement per phase, to include overheating and cooling), 50 (Renewable Energy Technologies-provision/maintenance/noise assessment per phase), 52 (detailed assessment of wind effects and related mitigation), 53 (Agent of Change), 54 (Daylight/Sunlight), 57 (Cycle parking), 58 (Car parking), 61 (Refuse Facilities), 63 (Sound Insulation), 76 (Urban Greening Factor), 77 (Fire Statement) and 80 (EIA compliance).		
Applicant Name & Address: London Borough of Enfield, Civic Centre, Silver Street, Enfield, EN1 3XA		Agent Name & Address: DP9, 100 Pall Mall, London, UK
RECOMMENDATION:		
<ol style="list-style-type: none"> 1. The Head of Development Management be authorised to GRANT approval for the Reserved Matters application subject to conditions. 2. That the Head of Development Management be granted delegated authority to finalise the wording of the conditions to cover the matters in the Recommendation section of this report. 3. That Head of Development Management be authorised to discharge the details submitted pursuant to conditions 9, 11, 15, 23, 27, 29, 31, 32, 35, 36, 37, 39, 40, 43, 47, 48, 49, 50, 52, 53, 54, 57, 58, 60, 61, 63, 76, 77 and 80. 		

1. Note for Members

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

2. Executive Summary

- 2.1. This application consists of a Reserved Matters application and 29 conditions that the Applicant is seeking to discharge from the Outline Planning Permission. The conditions have been submitted to support the application and therefore the assessment for both this Reserved Matters application and the conditions will run concurrently within the report.
- 2.2. The proposal is the first Reserved Matters application to be submitted pursuant to the Meridian Water Phase 2 Outline Planning Permission. The Outline Planning Permission (OPP) was approved in March 2022 and sets the parameters for all of the future plots that will come forward as part of Meridian Phase 2. Additionally, a design code was approved with the OPP and this provides an overarching framework to assist with the detailed design of individual plots and to ensure consistency across the entire Phase 2 development.
- 2.3. The proposed development comprises 274 residential units, 3,017.78sq.m of commercial floorspace, soft landscaping, private open space and public realm improvements. The proposed building is arranged into 4 main blocks and has a maximum height of 16 storeys. A podium is provided at first floor level which provides communal amenity and child playspace for the occupants.
- 2.4. The proposal would deliver 100% affordable housing, split across London Affordable Rent (LAR), London Living Rent and Shared Ownership. This level and mix of affordable housing in this first phase of development on Phase 2 is supported by officers as it addresses the Borough's greatest housing need.
- 2.5. In terms of housing mix the proposal seeks to provide 30% family housing which is supported. The residential units would be of high quality with 95% of the units being dual aspect. All units have access to private amenity space and communal amenity space in the form of a podium.
- 2.6. The proposal is providing 43 parking spaces, 6 of which will be allocated to the commercial units whilst the remaining 37 will be for the residential units. This provides a parking ratio of 0.14 which is considered acceptable noting that Phase 2 is a car-lite development and seeks to promote sustainable methods of transport. The proposal would provide 521 cycle spaces, both long and short stay spaces for both the residential and commercial provision. The proposed cycle parking quantum is policy compliant and therefore supported by officers.
- 2.7. Soft landscaped areas have been provided at ground and first floor level, these include rain gardens, climbing plants, trees and swales. Additionally, the proposal includes blue and green roofs which altogether contribute to a positive experience of the public realm and provide much needed sustainable drainage features.

- 2.8. There are a number of outstanding detailed matters that are still being resolved with the Applicant at the time of writing this report. Further details are required with respect to the signage and public realm strategies before these conditions can be discharged. Finer architectural details and additional landscaping plans to resolve detailed issues have also been requested and are under review. The current proposal to introduce structures in the landscape on the brook side to address wind and microclimate issues on this side of the building is not fully supported and an alternative solution is being sought. In addition to this, further details are being sought in relation to the SuDS strategy to determine which SuDS features will be activated and when. An update will be provided at the meeting.
- 2.9. Overall, the proposed development will provide high quality and affordable homes in a range of sizes that will benefit the local community. Furthermore, the proposal provides ecological enhancements and sustainable drainage features through new landscaped areas. The proposed development is therefore considered acceptable and in accordance with the development plan policies and the Outline Planning Permission.

3. Recommendation

1. The Head of Development Management be authorised to **GRANT** approval for the Reserved Matters application subject to conditions.
2. That the Head of Development Management be granted delegated authority to finalise the wording of the conditions to cover the matters listed below.
3. That Head of Development Management be authorised to discharge the details submitted pursuant to conditions 9, 11, 15, 23, 27, 29, 31, 32, 35, 36, 37, 39, 40, 43, 47, 48, 49, 50, 52, 53, 54, 57, 58, 60, 61, 63, 76, 77 and 80.

3.1. Conditions

1. Approved Plans
2. Wind (details of mitigation measures e.g. canopies/baffles)
3. Details of signage
4. Landscaping
5. Boundary Treatment (Green Wall)
6. Design Conditions
7. Lighting
8. Secure by Design
9. Off site playspace provision

4. Site and Surroundings

- 4.1. The site is approximately 0.710ha and sits within the most southern part of the Phase 2 redline boundary. The site is identified within the parameter plans as Plot Z02-01 and comprises the former gasholder site adjacent to Leaside Road. The gasholder structure has been decommissioned and removed from the site, the site was cleared in 2015 and is therefore vacant.
- 4.2. The Meridian Water Phase 2 OPP comprises in total approximately 11.9 hectares of industrial/commercial land and buildings. The OPP allows for a range of uses including residential accommodation, purpose built student accommodation/purpose-built shared living, a hotel and commercial development and social infrastructure. The OPP sits alongside the planning permission for the Strategic Infrastructure Works (SIW) (19/02717/RE3) which will see the delivery of the new road and bridge infrastructure, together with the delivery of the new parks.
- 4.3. The Site is located in the Upper Edmonton ward of the Borough. To the south of the site is Leaside Road which forms the boundary with the London Borough of Haringey (LBH). On the opposite side of Leaside Road is an existing industrial estate within the LBH and that is designated as strategic industrial land. To the east of the site is Pymmes Brook and to the north is the Orbital Business Park. Immediately adjacent to the Site is the now vacant IKEA Tottenham and the Tesco Extra is just beyond this.
- 4.4. The site has a PTAL of 2, suggesting currently poor access to sustainable methods of transportation. However, the site is in close proximity to Meridian Water Train Station (5 minutes walk) and bus routes on Watermead Way and Willoughby Lane. Moreover, the shadow S106 Agreement linked to the OPP secures contributions to enhance bus capacity in the area.
- 4.5. The site is located within Flood Zone 2 which is defined by the Environment Agency as land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding whereas the wider Phase 2 Outline area ranges between Flood Zones 1 - 3.
- 4.6. The site is not within a Conservation Area nor does it fall within the setting of a Listed Building.

5. Proposal

- 5.1. This application consists of a Reserved Matters application and 29 conditions that the Applicant is seeking to discharge from the OPP. The conditions have been submitted to support the application and therefore the assessment for both this Reserved Matters application and the conditions will run concurrently within the report.
- 5.2. This Reserved Matters application seeks to bring forward a mixed use residential-led development. The ground and first floor of the development will provide 3,017.78sq.m of commercial floorspace. 274 residential units are provided from the 1st floor to the 15th floor within blocks ranging in height from 5 to 16 storeys. The proposal also includes a private podium which provides communal amenity for the future occupants, SuDS features including blue/green roofs and associated car and cycle parking.
- 5.3. The proposal is providing 43 car parking spaces, 6 of the parking spaces are allocated for the commercial use whilst 37 spaces will be for the residential use. 16 parking spaces are located externally along the western boundary and 27 spaces are located within the under-croft parking area. Cycle parking and refuse stores are

located on the ground floor and have access via entry points on the perimeter of the site or from within the under-croft.

- 5.4. In addition to the above, this plot is in close proximity to the Leaside Link Road Bridge being delivered under the SIW. The new bridge connection will increase the connectivity of the site and provide access into the heart of the Phase 2 development and to the proposed Brooks Park, adjacent.
- 5.5. The gasholder plot (Z02_01) is the first reserved matters application for Meridian 2 and can be seen in the image below outlined in red:



Figure 1

6. Relevant Planning Decisions

- 6.1. 22/02065/NMA – Non-material amendment to Ref: 19/02718/RE3 to allow alterations to the location of commercial floor spaces at 1st floor level, alterations to access routes around the perimeter of plot and allowance for servicing around the building to relate to the residential and commercial entrances. This application is pending consideration.
- 6.2. 21/04218/RE4 - Construction of a primary substation (Use Class Sui Generis) together with hard and soft landscaping and associated works. The application was approved in February 2022.

- 6.3. 19/02718/RE3 – Phase 2 Outline Planning Application - Development of Phase 2 of Meridian Water comprising residential (Class C3), Purpose Built Student Accommodation and/or Large-Scale Purpose-Built Shared Living (Sui Generis); hotel (Class C1), commercial development (Class B1a,b,c); retail (Class A1 and/or A2 and/or A3 and/or A4), social infrastructure (Class D1 and/or D2), a primary school up to three forms of entry, hard and soft landscaping, new public open spaces including equipped areas for play, sustainable drainage systems, car parking provision, and formation of new pedestrian and vehicular access (all matters reserved). The application was granted planning permission in March 2022 and is accompanied by a shadow S106 Agreement that secures amongst other things, the minimum quantum of affordable housing, the housing mix to be delivered across the site, and contributions to bus re-routing and capacity enhancement, health provision and open space enhancements.
- 6.4. 19/02717/RE3 – Strategic Infrastructure Works - Full application for the redevelopment of the site to provide infrastructure works for the delivery of a mixed-use development comprising construction of an east-west link road between Glover Drive and Harbet Road (the Central Spine); alteration of access road between Argon Road and Glover Drive, construction of a link road between Leaside Road and the Central Spine, pedestrian and cycleway improvements to Glover Drive and Leaside Road, the construction of 4 no. bridges across the Pymmes and Salmon Brooks and River Lee Navigation; alteration to the Pymmes Brook channel, associated landscaping and formation of new public open space. Enabling works, comprising earthworks; remediation; flood conveyance channel, flood alleviation, outfall and new public open space works; utilities infrastructure; demolition of existing buildings, formation of new access's and associated works.

7. Consultations

Pre-application Consultation by Applicant

- 7.1. Prior to the submission of the Reserved Matters application, the Applicant sought pre-application advice from the Council between August 2021 and April 2022 which assisted in the design development of the proposal.

Design Review Panel

- 7.2. The scheme was presented twice to the Design Review Panel (DRP) in October 2021 and January 2022. The DRP supported the scale and massing of the proposal and the landscape references to the former use of the site as a gasholder. The DRP raised concerns with a single tenure scheme and highlighted the importance of the access route to the north of the site for pedestrians and cyclists. The DRP also encouraged the Applicant to maximise the use of soft landscaping on the ground floor particularly on the brookside
- 7.3. *Officer response:* Whilst this is a 100% affordable scheme, within the definition of affordable housing a mix of tenures is proposed, including London Affordable Rent, London Living Rent and Shared Ownership. Turning to the issue of access to the north, this land is currently owned by Ikea and it is therefore beyond the Applicant's gift to secure the access route within this application. Notwithstanding this, the Council are in discussions with Ikea in order to try and secure the access route for pedestrian use in the future. The design of the space to the north of the building allows for this connectivity to be delivered in the future if discussions with Ikea are positive.

Public

- 7.4. In terms of public and neighbour pre-application consultations, the Applicant distributed a flyer to 3,056 neighbouring properties on 03 February 2022 notifying them of the launch of the consultation and upcoming in-person events. The consultation also included targeted social media campaigns, a digital consultation website and two in-person drop in events at Fore Street Library and Edmonton Green Shopping Centre. According to the Statement of Community Involvement (SCI) submitted with the application, the digital consultation website was viewed by 2,487 people and the in-person events were attended by 140 people. Additionally, 10 people watched the webinar and 17 survey responses were received. The SCI provides a summary of the comments received which related mainly to the tenure of the proposal with residents wanting to know what was meant by the term “affordable”. Concerns were raised with respect to parking/congestion, this was in relation to Meridian Water as a whole and the number of cars that would be added to the roads as a result of the development. Further comments were raised surrounding expressions of interest in renting the workspace, eligibility for the new homes and a completion timeframe for the development.

Public Consultation

- 7.5. Consultation letters notifying occupiers of the planning application were sent to 580 properties within the vicinity of the site on 28th June 2022. Two site notices were also displayed from 5th September 2022 in locations around the site. Two consultation responses have been received objecting to the proposal on the following grounds:
- Lack of genuinely affordable homes;
 - Insufficient family homes;
 - Close proximity to adjoining properties;
 - Conflict with local plan;
 - Increase in traffic;
 - Insufficient open space;
 - Contaminated land and
 - A strain on existing community facilities.

Officer Response

- 7.6. The outline planning permission requires a minimum of 30% family units (20% 3 beds and 10% 4 beds) across the Phase 2 area. The proposal provides 100% affordable homes, the proposed tenures are London Affordable Rent, London Living Rent and Shared Ownership. The proposed tenures provide a mix of low cost and intermediate housing in accordance with the London Plan definitions for affordable housing and are therefore considered to be policy compliant. Whilst this proposal is not providing 4 bed units, it is providing 30% family homes and officers note that the requirement of the outline permission is to deliver the requirement for 4 bed units across the Phase 2 site as a whole and not on a plot by plot basis.
- 7.7. In terms of proximity to neighbouring properties, the site is surrounded by commercial/industrial units with the nearest residential properties approximately 200m away on Willoughby Lane. Concerns were also raised with respect to an increase in traffic as a result of the Meridian Water development. However, a Transport Assessment was submitted with the OPP and the impacts of the total quantum of development on the surrounding road network has already been assessed and considered to be acceptable.

- 7.8. With respect to the potential for contaminated land, Condition 16 of the Outline Planning Permission requires a remediation strategy to be submitted and approved by the Council prior to the commencement of development. This condition remains to be discharged
- 7.9. The OPP also approved a quantum of community floor space and the shadow S106 Agreement requires the details of a strategy to be submitted and approved to demonstrate how this space will be allocated and delivered across the entirety of the phase 2 development

Statutory and Non-statutory Consultees

7.10. Environmental Health:

Environmental Health confirmed that the Applicant has submitted sufficient information surrounding air quality and sound insulation to discharge conditions 23 (air quality) and 63 (sound insulation) and that no negative impact will arise from the development.

7.11. Transportation:

The Transportation Team reviewed the proposal and requested further information in relation to the management of vehicle movements within the site and the approach to the disabled car parking spaces. The Applicant provided further information which detailed the position of bollards and an on-site management team that would monitor vehicle movements within the site. In terms of disabled spaces, alternative levels of provision were demonstrated on plan and it was determined by the Transport Team that the original approach to provide 3% disabled spaces was preferred.

7.12. Watercourses Team:

The Watercourses Team have been consulted on the proposal; the team have requested further details with respect to the activation of certain SuDS features. Whilst this information remains outstanding Condition 32 (Surface water/infiltration and drainage management plan) cannot be discharged.

7.13. The Canal and River Trust

The Canal & River Trust were consulted on the planning application and confirmed that due to the nature of the application they did not need to be consulted. Therefore, they have not provided any comments on the proposed development.

7.14. Metropolitan Police

The Metropolitan Police raised no objection to the proposal and have requested a condition be attached to the permission requiring the applicant to meet secure by design 'accreditation'. A condition is recommended above.

7.15. Historic England

Historic England raised no objection to the proposal and advised that there is sufficient information to discharge condition 35 (Archaeology).

7.16. Environment Agency

The Environment Agency (EA) raised no objection to the proposal in terms of flood risk and has approved the discharge of Condition 15 (Flooding). However, in their initial response they requested the naturalisation of Pymmes Brook. The Applicant provided a technical note which outlined that there would be a risk of contaminating the brook if naturalisation on this plot were to be explored. The EA have accepted this position. They have asked if alternative naturalisation through enhancement in an offsite reach within the Salmons Brook catchment could be delivered. However, that is beyond the scope of this application which is a Reserved Matters submission seeking to discharge conditions of the OPP. Notwithstanding this, naturalisation to sections of the Brook are already secured via the SIW permission which delivers full naturalisation on the eastern bank to the section of the watercourse within Brooks Park. As such the EA have confirmed that they have no objection to the proposal.

7.17. Health & Safety Executive

The Health & Safety Executive (H&SE) initially raised concerns relating to the single staircase escape route connecting to a covered car park by way of the lobbies. This design approach was not considered to be in accordance with the adopted fire standard which states that only staircases which do not form part of the only escape route from a flat may also serve ancillary accommodation if it is separated from the ancillary accommodation by a protected lobby or protected corridor. The applicant made amendments to ground floor plans to separate uses in line with fire regulations. As a result of the changes, refuse and cycle stores are now accessed externally or from within the podium. H&SE were reconsulted on the revised plans and are now in support of the proposal.

7.18. Sustainability Team

The Sustainability Team raised no objection to the proposal and recommended the discharge of Condition 49 (Energy statement per phase, to include overheating and cooling), Condition 50 (Renewable Energy Technologies-provision/maintenance/noise assessment per phase), Condition 52 (detailed assessment of wind effects and related mitigation) and Condition 53 (Agent of Change).

7.19. Thames Water

Thames Water raised no objection to the proposed development regarding foul or surface water discharge.

7.20. Natural England

Natural England were consulted on this application and advised that although mitigations measures had been agreed with the outline the proposal is required to submit an appropriate assessment. In line with this, the Applicant has submitted a Shadow Habitats Regulation Assessment that Natural England have confirmed they are satisfied with.

7.21. Lea Valley Regional Park Authority (LVRPA)

The LVRPA requested design changes that would move the taller blocks away from the park on the east of the site to the west. Further requests were sought in relation to enhancing the treatment of the south/south east boundary to provide a more

attractive entrance point into the regional park. Additional queries were raised in relation to light pollution, the addition of more native species to the landscape management plan, channel softening along the Pymmes Brook boundary and the allocation of s106 monies to establishing a safe and attractive means of access and public realm adjacent to the park entrance.

Officer response:

The proposed massing and height of the blocks are in accordance with the parameter plans which were approved as part of the OPP. The massing of the individual blocks is broken down through the architectural detail within each façade and as per the submitted townscape views is considered to not have an over dominating appearance on the Park in line with the principles established within the OPP.

The site does not have direct access to the regional park, notwithstanding this the proposed development provides a strong relationship with the wider infrastructure works to the southern boundary of the Site. The phase shall provide soft landscaping to the brook edge through the delivery of public realm, but as outlined above, further naturalisation cannot be delivered on this plot. The proposals includes a pedestrian route that shall be able to continue to the north and south, thus allowing for connection to the marshes.

In terms of light pollution, Natural England were consulted on the application and did not raise this as a concern. Notwithstanding this, details of lighting levels are required to be submitted to the Council under Condition 42 of the OPP to ensure appropriate levels of lighting for the built and natural environments across the site.

The s106 financial contributions have been set by the OPP, as such additional contributions cannot be sought for this Reserved Matters. Nevertheless, the whole of the Phase 2 area will see significant public realm improvements which will be delivered by phase developers where they fall within the red line boundary of the site and through the Strategic Infrastructure Works.

7.22. Waste Team

The Waste Team have advised that they have no objection to the proposal.

8. Relevant Planning Policies

8.1. Section 70(2) of the Town and Country Planning Act 1990 requires that development proposals be determined in accordance with 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.

8.2. National Planning Policy Framework

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

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the

right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

8.4. The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

8.5. In relation to achieving appropriate densities paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

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

8.7. The NPPF sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:

“(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed); or

(ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

- 8.8. 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.”
- 8.9. The Council’s recent housing delivery has been below our increasing housing targets. This has translated into the Council being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.
- 8.10. The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the 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.
- 8.11. 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.
- 8.12. 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.
- 8.13. This is referred to as the “tilted balance” and the 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 the 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.

8.14. London Plan (2021)

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

Chapter 1

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG4 Delivering the homes Londoners need

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

Chapter 3

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D6 Housing quality and standards

Policy D7 Accessible housing

Policy D8 Public realm

Policy D9 Tall Buildings

Policy D11 Safety, Security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Chapter 4

Policy H10 Housing size mix

Chapter 5

Policy S4 Play and informal recreation

Chapter 8

Policy G1 Green infrastructure

Policy G4 Open space

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Chapter 9

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 3 Energy infrastructure

Policy SI 4 Managing heat risk

Policy SI 5 Water infrastructure

Policy SI 6 Digital connectivity infrastructure

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SI 12 Flood risk management

Policy SI 13 Sustainable drainage

Chapter 10

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling
Policy T6 Car parking
Policy T6.1 Residential parking
Policy T9 Funding transport infrastructure through planning

Chapter 11
Policy DF1 Delivery of the Plan and Planning Obligations

8.15. Local Plan - Overview

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

8.16. Core Strategy (2010)

The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the borough is sustainable.

Core Policy 4: Housing quality
Core Policy 5: Housing types
Core Policy 9: Supporting Community Cohesion
Core Policy 20: Sustainable Energy use and energy infrastructure
Core Policy 21: Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 24 : The road network
Core Policy 25: Pedestrians and cyclists
Core Policy 28: Managing Flood Risk through Development
Core Policy 29: Flood Management Infrastructure
Core Policy 30 : Maintaining and improving the quality of the built and open environment
Core Policy 31: Built and landscape heritage
Core Policy 32: Pollution
Core Policy 36 : Biodiversity
Core Policy 38: Meridian Water

8.17. Development Management Document (2014)

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

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
DMD 43: Tall Buildings
DMD45: Parking Standards and Layout
DMD47: New Road, Access and Servicing
DMD49: Sustainable Design and Construction Statements
DMD50: Environmental Assessments Method
DMD51: Energy Efficiency Standards
DMD 52: Decentralized energy networks
DMD53: Low and Zero Carbon Technology
DMD55: Use of Roof space/ Vertical Surfaces
DMD58: Water Efficiency
DMD 61: Managing surface water
DMD65: Air Quality
DMD68: Noise
DMD69: Light Pollution
DMD 73: Child Play Space
DMD 78: Nature conservation
DMD79: Ecological Enhancements
DMD80: Trees on development sites
DMD81: Landscaping

Enfield Local Plan (Reg 18) 2021

8.5 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.

8.6 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.

8.7 Edmonton Leaside Area Action Plan (2020)

Policy EL1: Housing in Meridian Water
Policy EL2: Economy and Employment in Meridian Water
Policy EL8: Managing Flood Risk in Meridian Water
Policy EL10: Urban Grain at Meridian Water
Policy EL11: Building Form at Meridian Water
Policy EL12: Public Realm at Meridian Water

8.8 Other Material Considerations

National Planning Practise Guidance (NPPG)
S106 SPD (2016)
Enfield Blue and Green Strategy (2021 -2031)
Natural England Interim Guidance (2019)

9. Analysis

9.1. This report sets out an analysis of the issues that arise from the proposals in the context of adopted strategic and local planning policies and the Outline Planning Permission. The main issues are considered as follows:

- Outline Planning Permission
- Housing Mix
- Affordable Housing
- Residential Design Standards
- Residential Amenity
- Fire Safety
- Commercial Use
- Design
- Archaeology and Heritage
- Open space/Playspace
- Highways Impacts
- Flood Risk and Drainage
- Ecology
- Landscaping
- Sustainability
- Environmental Statement

Outline Planning Permission (OPP)

- 9.2. The principle of development was established by the OPP granted on 31st March 2022 (19/02718/RE3) for the development of Phase 2 of Meridian Water. The Phase 2 outline permission allows the delivery of up to 2300 residential units, commercial floorspace, social infrastructure, public open space, car parking and hard and soft landscaping. The OPP was granted following extensive consultation with local residents, the Mayor of London and taking into consideration the relevant national, strategic and local planning policies contained within the Development Plan and the information provided in the Environmental Statement.
- 9.3. The OPP established parameter plans which provide a structure that each development phase within the OPP must adhere to. Each parameter plan relates to a different material planning consideration, as such matters relating to plot boundaries, land use, building heights, parking and protected frontages are set by the parameter plans. For this plot, the approved parameter plans allow a maximum height of 16 storeys, the maximum parking ratio is 0.25 and there are protected frontages on the east and southern boundaries. Furthermore, the shadow S106 sets out the minimum provision of affordable housing and the housing mix for the whole of the Phase 2 site. For affordable housing, the shadow s106 requires a baseline provision (before grant) of 28% by unit number and 31% by habitable room, this is a no less than figure which the Phase 2 development as a whole is required to meet and that as development progresses across the site it must not fall below. In terms of housing mix, the shadow s106 requires the provision of 20% 3 bedroom and 10% 4 bedroom units across the entire Phase 2 development.
- 9.4. This Reserved Matters application must be considered in this context and pursuant to this OPP provides detail in relation to scale, layout, access, external appearance and landscaping within these parameters for Plot Z02_01. The Reserved Matters application also seeks to discharge a number of conditions as listed within the description of development. The established parameters and principles set out in the OPP take precedence on strategic matters such as quantum and mix or affordable housing and parking.
- 9.5. The OPP was initially considered at planning committee in March 2020 where Members resolved to grant planning permission subject to a number of conditions. Planning permission was formally issued on 31st March 2022. However, since then

the Use Class Order 1987 (as amended) has been updated. The changes came into effect on 1st September 2020, and brings together existing classes A1(shops), A2 (financial and professional services), A3 (restaurants and cafes) and B1 (business), including both B1(b) and B1(c), as well as parts of classes D1 (non-residential institutions) and D2 (assembly and leisure) into one single "Class" known as Class E. Given that the OPP was approved using the previous use classes and the Reserved Matters application is governed by the OPP, this application is submitting details in accordance with the parameters that have already been approved; the previous use class order will therefore be applied to this proposal and referred to throughout this report.

- 9.6. This Reserved Matters application is the first phase of residential development. The proposal provides a mixed use residential-led development with commercial floorspace at ground and first floor level. The parameter plans approved as part of the outline allow for a mix of residential and employment uses on plot Z02_01 which the proposal complies with. However, the ground floor the central element on the western façade is used for servicing whilst the corners provide commercial units. The parameter plans require the predominant use along this frontage to be B1(a)(b) or (c) but due to the servicing requirements of the site, the ratio between commercial and servicing element is closer to 50/50 which is not fully in accordance with the parameter plans. Similarly, the predominant use on the northern façade are residential entrances and refuse and cycle stores whereas the parameter plans require the predominant use to be B1(a)(b) or (c). Lastly, on the first floor the north west corner is proposed as residential however, the parameter plans require this area to be workspace.
- 9.7. Officers acknowledge that as a result of the alterations within this plot, changes will be required to the Phase 2 OPP to ensure the plans and supporting documentation are consistent with the proposed development on plot Z02_01. The deviations from the parameter plans are considered to be minor and non-material given that they remain within the uses permitted on the plot and the addition of servicing on the ground floor is considered necessary to support both the residential and commercial uses. The principle of development is therefore considered acceptable.

Housing Mix

- 9.8. London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and that this should have regard to a number of criteria including robust local evidence, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site, amongst other considerations.
- 9.9. The shadow s106 agreement for the outline planning permission requires the Phase 2 development as whole to provide no less than 20% 3 bed dwellings and 10% 4 bedroom dwellings. Additionally, a housing programme is required to be submitted with each Reserved Matters application to demonstrate how the level of family housing will be met across the development having regard to the proposed unit mix for that particular phase. A schedule of the tenure/mix is also required to be submitted as per Condition 36. The Applicant has provided the below table which sets out the unit mix for this Reserved Matters application:

MIX BY NO HOMES

Tenure	1B1P	1B2P	2B3P	2B4P	3B5P	Grand Total
LAR		25	6	23	77	131
LLR	2	23	16	50	4	95
SO	1	16	10	18	3	48
Grand Total	3	64	32	91	84	274

MIX BY NO HABITABLE ROOMS

Tenure	1B1P	1B2P	2B3P	2B4P	Grand Total
LAR		50	18	69	445
LLR	2	46	48	150	262
SO	1	32	30	54	129
Grand Total	3	128	96	273	836

- 9.10. The proposal will provide 3 (1%) studio units, 64 (23%) 1 bedroom units, 123 (45%) 2 bedroom units and 84 (31%) 3 bedroom units. The table illustrates that the proposal will provide a reasonable mix of smaller and larger units. According to the Council's Local Housing Needs assessment, affordable/ intermediate 2 bedroom units are a high priority for the Borough. Similarly, intermediate 1 bedroom units are a priority and 3 bedroom units across all tenures are a priority. Noting this, officers are supportive of the range of unit sizes provided as they meet an identified need within the Borough and the mix is in accordance with the terms of the OPP.
- 9.11. In terms of family provision, officers acknowledge that there are no 4 bedroom units within this phase of development. However, the minimum figure set out within the shadow s106 applies to the entire phase 2 site and therefore does not need to be met within this specific phase as long as it is achieved across the wider development. The Housing Programme sets out the indicative unit mix across the outline permission and demonstrates that 20.42% of the units proposed will be 3 beds and 9.67% will be 4 beds. Whilst the individual figure for the 4 bedroom units falls slightly below the 10% requirement, together the 3 and 4 bedroom units equate to 30% family housing across the Phase 2 OPP. Furthermore, the Housing Programme is indicative of future phases and the provision can be continually reviewed to ensure the minimum 10% figure is met as such the proposed unit mix for plot Z02_01 is considered acceptable.

Affordable Housing

- 9.12. Enfield CS Policy 5 (Housing Types) states that the Council will aim for a boroughwide affordable tenure split of 70% social rented and 30% intermediate. The minimum overall level of affordable housing (before grant) secured through the OPP and shadow s106 is 28% by unit and 31% by habitable room. The aforementioned figures set a baseline for the affordable housing provision without grant funding. However, the shadow s106 requires each phase developer to positively seek to secure grant funding in order to achieve the maximum amount of affordable housing subject to viability. In terms of tenure, the shadow s106 requires 70% of units to be low cost rented housing and a maximum of 30% to be intermediate housing across the Phase 2 outline in accordance with CS Policy 5.

- 9.13. The proposed development seeks to provide 100% affordable housing. The blocks are split by tenure with Blocks A and C comprising London Affordable Rent (LAR), Block B comprising Shared Ownership (SO) and Block D comprising London Living Rent (LLR). The proposed tenure split is currently 48%/53% LAR and 52%/47% LLR/SO by unit number and habitable room respectively. Officers welcome the early delivery of affordable housing on the plot. Whilst the affordable tenure split on this plot in isolation is not consistent with the 70/30 split required by the shadow S106, this obligation relates to the entire Phase 2 outline and not per individual plot. A mixture of affordable tenures on this plot is supported and is within the overall terms of the OPP.
- 9.14. The DRP raised concerns about developing this as a single tenure plot as it was thought that this would preclude the rest of the Phase 2 site from providing a truly mixed and balanced community. Whilst the development is 100% affordable, it does include a range of affordable products, including shared ownership. The Housing Programme also indicates that affordable housing will be evenly distributed across the Phase 2 development. Given the site wide distribution of affordable housing it is considered that overall Phase 2 of Meridian Water will provide a mixed and balanced community notwithstanding that this is a 100% affordable plot.
- 9.15. Residential Design Standards
- 9.16. 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.

Space Standards

- 9.17. 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 residential units will have access to private balconies which meet or exceed the Mayor's housing space standards contained in the Housing SPG (2016) as well as a podium communal amenity space and public open space.

Dual Aspect

- 9.18. 95% of the proposed residential apartments are dual aspect, 64% are corner or through units and 31% are provided with projections that enable the inclusion of a window to achieve dual aspect. None of the proposed residential units are north facing single aspect and are therefore in accordance with the London Mayor's Housing SPG and BRE Guidance.

Inclusive Design

- 9.19. 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. Condition 37 of the outline consent reiterates this policy requirement as does the shadow S106.
- 9.20. There are 28 wheelchair adaptable homes (M4(3)) in this phase of development which are all provided above ground floor level. The M4(3) units are spread across the different tenures with 13 LAR units, 11 LLR units and 4 SO units. In terms of unit

mix, there are 4 x 1 bedroom 2 person units, 17 x 2 bedroom 3 person units and 7 x 3 bedroom 5 person units.

M43 HOMES

Tenure	1B2P	2B3P	3B5P	Grand Total	%
LAR		6	7	13	10%
LLR		11		11	10%
SO	4			4	10%
Grand Total	4	17	7	28	10%

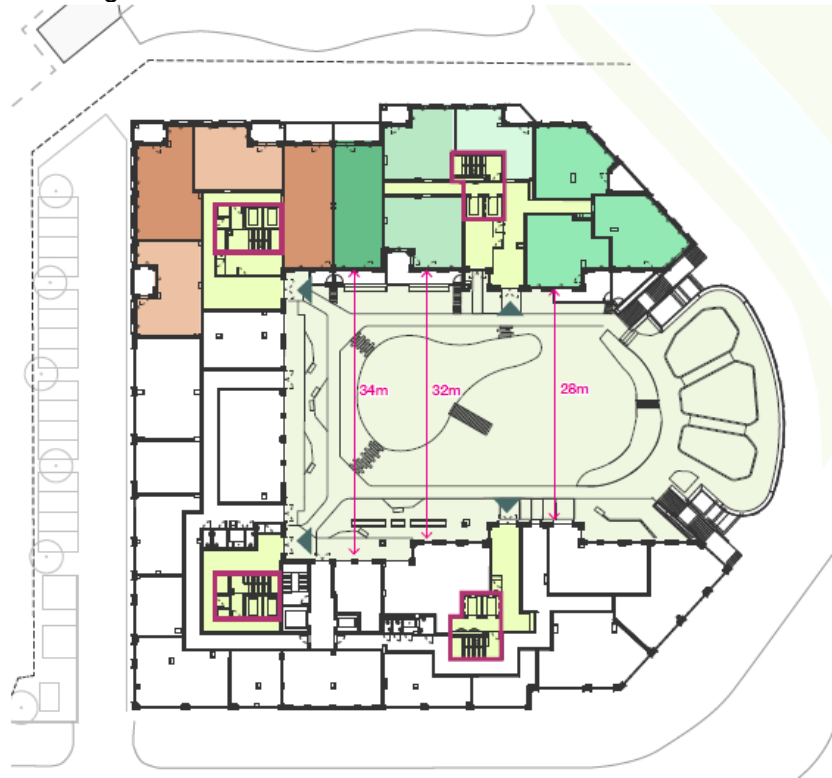
- 9.21. Within the scheme, 90% of the new homes are designed to Part M Category 2, 10% of the new homes are designed to Part M Category 3 in line London Plan Policy D7 (Accessible Housing) and consistent with the terms of the OPP.

Daylight and Sunlight

- 9.22. A Daylight and Sunlight Assessment has been submitted with the application which sets out daylight and sunlight levels within the proposed residential units and the podium communal amenity area. The report sets out that 95% of the rooms within the development meet the BRE guidance recommendations for Average Daylight Factor (ADF) this is inclusive of studio units, bedrooms and living/kitchen/dining areas. There are 19 bedrooms and 27 living rooms that fall below the BRE target levels for ADF, however, the deviations are marginal and considered less significant as their primary use is for sleeping. In terms of the living rooms, of the 27 that do not meet the criteria 13 of them are within 0.3% of the recommended ADF which officers consider to be a minor transgression. All of the 27 living rooms are located beneath or behind balconies or access decks and officers consider the benefits of having outdoor amenity space to outweigh the reduced ADF for these living rooms considering that it is a very small percentage (3%) of the total rooms in the development.
- 9.23. With respect to sunlight, the report advises that 126 (47%) of the main living rooms achieve the recommended levels of Annual Probable Sunlight Hours (ASPH) and Winter Probable Sunlight Hours (WPSH). However, officers note that 143 (53%) do not meet the recommended levels. The report outlines that this is due to overhanging balconies and the primary orientation of the unit. In the instances where the living areas are overhung by balcony it is considered that the provision of private amenity space is of high value to occupants and therefore outweighs the deficit in ASPH/WPSH. It should be noted that this level of compliance is common on multi-block schemes across London. Officers are satisfied that the proposal has explored all opportunities to maximise the level of daylight/sunlight received for each property, the proposal is therefore considered acceptable in this regard.
- 9.24. In terms of overshadowing, the assessment has reviewed the podium level private space for residents and the ground level public space to determine whether they will meet the 2 hour sun on ground test on 21st March. The results from the analysis demonstrate that both areas will receive at least 2 hours of sunlight to over 50% of the amenity space on 21st March.

Overlooking

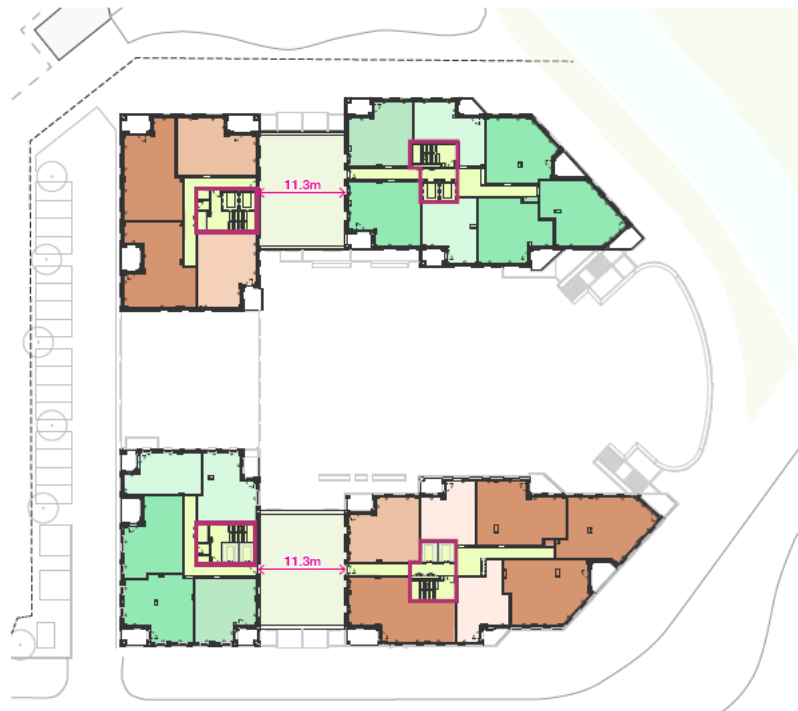
- 9.25. The proposed building is arranged into horseshoe shape with a central courtyard that has no built form along the southern edge. At first floor level there are residential properties on the north side of the building and commercial properties along the south and west. There is a separation distance between 28 – 34m across the podium which provides a generous distance between the residential and commercial units. Additionally, there are planters/planting and low level fences within the landscape design to improve privacy for residents. Furthermore, where balconies or terraces are close together perforated side privacy screens are proposed to enhance privacy and minimise overlooking.



- 9.26. The building is then split on levels 2 to 4 along the western boundary of the site between blocks B and C. The separation distance between the blocks is 18.3m which is considered to minimise overlooking between the apartments and it allows for the provision of a blue/green roof which will serve as visual amenity.



9.27. From level 5 upwards the building is split into 4 blocks (A, B, C and D) with blue/green roofs provided between Blocks A and B and Blocks C and D. The distance between these blocks is 11.3m which is less than the proposed distances on the lower levels. To mitigate overlooking the living spaces located on opposing facades are dual aspect with at least one window that has clear views out, this provides occupants with the option to screen one of the windows to minimise overlooking should they choose.



- 9.28. Overall, officers are satisfied that the separation distances provide adequate privacy and sufficiently prevent overlooking between residential units and commercial properties.

Residential Amenity – Future Occupiers

Air Quality

- 9.29. The applicant submitted an Air Quality Assessment with the application and is seeking to discharge Condition 23 (air quality) of the OPP. The Air Quality Assessment considers the effects that the proposed development will have on existing residential receptors and advises that the overall effect from the traffic generated at the operational phase will not be significant. With respect to future occupiers of the proposed development, the reassessed exposures demonstrate that no exceedances were predicted at the receptor locations for NO₂, PM₁₀ or PM_{2.5}. Environmental Health have been consulted with respect to this Reserved Matters and are satisfied that the information provided within the Air Quality Assessment is sufficient to discharge Condition 23.

Noise

- 9.30. A Noise Assessment has been submitted with the planning application to ensure that there is sufficient sound insulation within the development to protect future residents from noise pollution required by Condition 63 of the OPP. The report identifies the dominant noise sources in the sites surroundings as plant equipment from IKEA, the builder's merchants and HGV's on Leaside Road and Angel Edmonton Road. The assessment suggests that despite the external noise levels the proposed development can achieve the required internal noise level standards through the use of suitable glazing configurations with the windows closed. When the windows are open, the noise level limits will be exceeded. As such mechanical ventilation is proposed as mitigation, this allows residents the option to close their windows whilst allowing fresh air into the property and preventing overheating.
- 9.31. In terms of overheating, the assessment concluded that opening windows as a primary means of mitigating overheating at the north, west and south facades would be likely to have a negative impact on residents resulting in sleep disturbance during the night due to noise. For proposed facades facing into the central area of the site noise levels are expected to be significantly lower due to screening from surrounding noise sources provided by the building itself. For dwellings located at these facades, the use of opening windows as a primary means of mitigation for overheating is not likely to result in adverse effect. As noted above, for residents who are unable to open their windows due to noise disturbance the proposed mitigation is to have mechanical ventilation. Environmental Health were also consulted with regard to air quality and noise and advised that the proposed development did not give rise to concerns with respect to these matters.
- 9.32. In summary, the proposed development would not result in harm to the amenity of future residents within the Phase 2 site and the OPP conditions with respect to air quality and noise can be discharged. Overall, the proposed development is considered to be in accordance with the OPP and the development plan.

Fire Safety

- 9.33. Policy D12 of the London Plan states 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 the required criteria. The applicant has submitted a Fire Statement which sets out the main fire safety principles that have been designed into the development.

- 9.34. The Health and Safety Executive (H&SE) is the statutory consultee on matters of fire safety for buildings of 18m or 7 storeys in height, whichever is reached first. The H&SE initially identified issues relating to the single staircase escape route connecting to a covered car park by way of the lobbies. This raised concerns as the adopted fire standard states that only staircases which do not form part of the only escape route from a flat may also serve ancillary accommodation if it is separated from the ancillary accommodation by a protected lobby or protected corridor. As a result, the applicant made amendments to ground floor plans to separate uses in line with fire regulations. The H&SE reviewed these changes and removed objection from its consideration.
- 9.35. Due to the changes to the ground floor layout to ensure fire safety compliance, residents will have to exit the building in order to enter the refuse and cycle stores. As a result, officers consider it necessary to ensure safe well-lit access routes for future occupants of the site. A condition will therefore be attached to the permission requiring details of external lighting.
- 9.36. Having regard to the above, officers are therefore satisfied that the submitted Fire Strategy is in accordance with London Plan Policy D12.

Commercial Use

- 9.37. The proposal is seeking to provide 3,017.78sq.m (GIA) of commercial floor space on the ground and first floor levels along the eastern, north western and south western portions of the building. The parameter plans from the outline planning permission set out the suitable uses for this plot as B1(a)(b) and (c). The commercial spaces have therefore been designed to be flexible in order to meet the needs of a wide range of potential operators including office space and workspace. Internally, the commercial units on the ground floor have heights of 4m which will be more suited to workspace operators and the units on the first floor with a lower ceiling height are considered to be more suitable for office space.
- 9.38. The Commercial Marketing Strategy submitted as part of the shadow s106 obligations for the OPP sets out the approach for assessing the demand for workspace and office space in this location. The proposed approach within the strategy is to undertake soft market testing 12 months prior to completion of the RMA phase to promote the opportunity and review market responses. The strategy advises that current research evidence suggests that the provision of light industrial floor space is required in London and it remains crucial to London's economy and culture.
- 9.39. Overall, officers consider the floor space provided and configuration of individual units to provide sufficient flexibility in order to attract a wide range of operators. The proposal is therefore considered acceptable in this regard.

Design

- 9.40. 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.

- 9.41. 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.
- 9.42. Policy EL11 of the Edmonton Leaside Area Action Plan requires justification for buildings taller than 10 storeys in height in accordance with Policy DMD 43. The tall buildings assessment must demonstrate the appropriateness of the site for a taller building in terms of its role and contribution to Meridian Water, connectivity, its impact on local communities and the quality of accommodation it will provide.
- 9.43. The design code for the OPP sets out the parameters for plot Z02_01 within the gasholder plot section. The reserved matters application is broadly in accordance with the urban design principles established within the design code in terms of layout, function and legibility.

Layout

- 9.44. The building comprises 4 blocks with a central podium that has views out towards the east of the site. The ground floor comprises commercial floorspace along the entire eastern frontage, the majority of the southern façade and the north west corner. The commercial units are considered to successfully create active frontages on the plot and activate the corners of the building. The ground floor also comprises residential entrances for each of the 4 blocks, refuse and cycle stores and parking.

Scale, Height and Massing

- 9.45. The immediate site surroundings comprise commercial and industrial uses in quite low level buildings. The proposal seeks to provide a building with a maximum height of 16 storeys which officers acknowledged will be larger than the surrounding buildings. However, the proposal should be viewed in the context of the OPP and the overall vision for Meridian Water. The parameter plans for the outline allow heights in excess of 20 storeys as such on the Phase 2 site, the proposal will align with the future context of the area.
- 9.46. The proposal is in excess of 10 storeys and therefore justification is required as to whether the site is suitable to provide a tall building. In terms of visual context, as noted above the current site surroundings comprise low level buildings. However, the OPP has approved heights in excess of 20 storeys within the heart of the development adjacent the Central Spine Road. The sites future context will therefore provide a range of medium to tall buildings. The sites visual impact is therefore considered to have a low impact on the townscape in the context of the approved Phase 2 OPP.
- 9.47. In terms of site connectivity, the location has a PTAL of 2 which is expected to improve due to increase bus connections within the Phase 2 site. Furthermore, new constructed Meridian Water Train Station is in close proximity to the site, with a 5 minute walk time, and there are existing bus stops located on Willoughby Lane and Watermead Way. Additionally, new cycle routes will be provided as part of the OPP and SIW which will provide more access to sustainable methods of transportation. With the proposed improvements, the site connectivity is considered appropriate for a tall building.

- 9.48. Due to the sites location within a former gasholder and wider industrial estate, there are no residential properties within 200m of the site. Noting this, the proposal will not have a negative impact on the amenity of residential properties with respect to daylight/sunlight, overshadowing and loss of privacy. In terms of visual amenity, the proposal provides high quality architecture and public realm enhancements through soft landscaping.
- 9.49. With respect to quality, 95% of the homes are dual aspect and 95% of the rooms within the development meet the BRE guidance recommendations for Average Daylight Factor. The compliance for Annual Probable Sunlight Hours (APSH) is lower at 47% however, this is balanced against the need to provide outdoor amenity space. It is considered that the proposal would provide high quality homes in accordance with the tall buildings policy.
- 9.50. The proposed mass of the building is broken down into 4 distinct elements, allowing visual separation of elements as well as views, light and air to move through the gaps in between. This strategy is supported as it creates more elegant forms and also allows the provision of a high percentage of dual aspect homes. Smaller linking elements provide enclosure to the podium deck on 3 sides which help provide screening as well as providing additional residential accommodation. Their architectural treatment and setbacks make these visually recessive, which is supported. Below is a view of the proposal from the east:



- 9.51. As shown in the image above, the architects have skilfully incorporated variations in the building lines, inset balconies and changes in material pallets to further break down the mass of each of the 4 main building forms.
- 9.52. Overall, the proposal provides a confident, efficient use of land that has created a skilfully crafted and attractive group of buildings. It is officers view that the applicant

has struck the right balance between the provision of homes and responding to the planned context of the development. Officers therefore support the proposed height and massing.

Materials

- 9.53. The submitted plans show high quality details including window surrounds and the division of the facades into a series of hierarchical grids. Officers consider the success of the scheme depends on these being carried through to construction and the applicant should note that going forward any amendments that seek to reduce the quality of the scheme would not be supported.
- 9.54. Meridian Water is seeking to build a unique character that incorporates its historically industrial nature. The gasholder plot is a part of that history and as such the proposed development has sought to incorporate design features that reference the sites former use. Officers consider that whilst the proposal is of high quality further details are required via condition for the bricks, fenestration and balcony balustrades to ensure that features that will reference the sites historic use as gasholder are captured in the design.
- 9.55. The overall signage strategy is supported however, further details are required with respect to materials, lighting solutions, levels of projection and fixing mechanisms which will be secured via a condition to ensure a common language across the site and to protect the visual appearance of the buildings and public realm.
- 9.56. Overall, the proposal is considered to be in general accordance with the parameter plans in terms of the block heights, massing and the proposed materiality. The proposal provides high quality urban design which is considered to be important given that the proposal is 100% affordable housing and due to it being the first residential phase of the Meridian 2 OPP.

Secure by Design

- 9.57. London Plan Policy D11 and Core Policy 9 promote the integration of design measures that create safe and secure environments for the community. This is seen as integral to good design.
- 9.58. The Metropolitan Police were consulted on the application and have raised no objection to the proposals. However, they have requested that a condition be attached to the permission requiring the applicant to achieve Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards. A condition is included above.

Archaeology and Heritage

- 9.59. The site falls within an Area of Archaeological Importance, as such a condition was attached to the OPP requiring the submission of a written scheme of investigation (WSI) for geoarchaeological borehole sampling. The applicant has submitted a WSI in accordance with condition 35 and it sets out the evaluation strategy and methodology to be used in investigating the site. Historic England have been consulted on the application for discharge of this condition and confirm that the information provided within the WSI is sufficient to discharge the condition.

Open Space

- 9.60. London Plan Policy G4, Core Strategy Policy 34 and DMD Policy 71 support the creation of new open space a high-quality public realm to ensure satisfactory levels of provision and address areas of deficiency. The design code for the outline planning permission requires 30% of the site to be open space.
- 9.61. The proposed development is providing 2,179sq.m of open space at ground floor level and 1,693sq.m at first floor level which meets the 30% requirement within the design code. The general design and layout of the podium is also supported. There is a rich mix of play, planting and relaxation areas. Sunlight and daylight penetration meets BRE standards which is a significant achievement for a high density development. Furthermore, there are several views out of the podium which will contribute to creating a pleasant and comfortable space to be in, as well as allowing abundant air movement to help combat overheating and help air quality in the surrounding apartments.
- 9.62. In addition to the above, the provision of the protruding curved space in the east will give all residents the opportunity to enjoy views of the park and Tottenham Marshes in a secure and well-maintained environment. Sections confirm that access is provided near the raised planters in this area to make the most of opportunities for the views and this is supported.
- 9.63. With respect to playspace, the proposed approach is to provide door step play on site for ages 0 – 4. A playable area of 994sq.m has provided within the podium with details of the play equipment including but not limited to a slide, a spinner and chimes provided and supported by officers. The remaining play provision for ages 5-17 will be provided off plot and within the adjacent Brooks Park to be delivered through the Strategic Infrastructure Works. The shadow S106 Agreement requires the submission of a playspace delivery plan to demonstrate how off plot requirements are to be planned and delivered to ensure quality accessible playspaces for future residents across the whole Phase 2 development. The playspace delivery plan identifies an area within Brooks Park to accommodate the required amount of playspace to meet the policy requirements for ages 5-11- and a condition is recommended to require this be provided and details of the equipment to be included shall first be submitted for approval. Off plot provision for 12 and over will be provided by the master developer with the parks to be delivered through the SIW.
- 9.64. Overall, officers are supportive of the provision of high quality outdoor communal amenity and the play provision for under 5's on plot, with the balance being met within the larger areas of parkland approved through the SIW and being delivered across the Phase 2 development. The details submitted with respect to the on plot playspace are also considered sufficient to discharge Condition 40 (Details of laying out/planting of open spaces/ layout and type of play equipment) of the OPP.

Meanwhile Security

- 9.65. A Security Statement has been submitted with this Reserved Matters application to comply with Condition 43 (Meanwhile security and condition) of the OPP which requires details of a strategy to deal with the enclosure and treatment of building plots until development commences. The Security Statement sets out the security measures for the site which comprises a double gate with access only from Leaside Road and a strategy to ensure maintenance of the gate should it be required. Officers are satisfied that the information supplied is sufficient to discharge Condition 43.

Highways Impacts

- 9.66. London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards. Having regard to this, the OPP has accepted a car-lite position for the proposal with a maximum car ratio of 0.25 across the Phase 2 development area.

Public Transport Capacity

Bus Services

- 9.67. The site has a PTAL rating of 2 which suggests poor access to sustainable methods of transportation. However, the Transport Assessment prepared illustrates that the site is well served by 4 bus routes with bus stops located within close proximity of the site. The bus routes are set out in the table below:

Table 3.2 Summary of Bus Services Serving Glover Road

Service	Route	Frequency		
		Mon-Fri (Thurs*)	Sat	Sun
192	Enfield – Edmonton Green – Glover Drive – Tottenham Hale	8	7	4-5
341	Glover Drive – Northumberland Park – Tottenham – Manor House – Angel – Holborn Circus – Waterloo – County Hall	5 – 7 (7*)	5 - 7	5 - 6
34	Barnet – Arnos Grove – Silver Street – A406 -Walthamstow	8 -10	6 - 8	5 - 6
444	Chingford – A406 – Silver Street – Turmpike Lane	5 - 6	5 - 6	4

Rail Services

- 9.68. The nearest rail service to the site is Meridian Water station which was opened in 2019 and is served by the West Anglia Main Line. The station can be accessed via Leaside Road and Angel Edmonton Road and is approximately 480m from the site which equates to a 5-6 minute walk. Northumberland Park station is also in close proximity to the site and can be accessed via Willoughby Lane and Park Avenue and is approximately 1.4km from the site which is roughly a 14 minute walk or 5 minute cycle.

Car Parking

- 9.69. The proposal provides parking along the service road on the western boundary and undercroft parking beneath the podium. There are 43 spaces including 9 DDA compliant spaces and 6 commercial spaces which provides a parking ratio of 0.14 spaces per dwelling. The proposal is encouraged to be car-lite by the current London Plan and the outline planning permission which sets a maximum ratio of 0.25 across Phase 2. The London Plan does not set a minimum standard for car-lite developments and neither does the outline planning permission for Phase 2. The Transport Assessment states that parking has declined since 2011 and current data suggests that the average car ownership is 0.59% per household. Whilst these figures are in excess of the proposed provision, the Phase 2 development and Strategic Infrastructure Works are seeking to improve connectivity across the wider

site and improve access to sustainable methods of transportation. Officers therefore consider the parking ratio appropriate for this phase of the development.

- 9.70. In terms of the commercial parking, the proposal seeks to provide 1 space per 600sqm of floorspace in accordance with London Plan policy. The total floorspace proposed for the commercial aspect is 3,017.78sqm which requires 5 parking spaces, the provision of 6 spaces is therefore considered acceptable.

Disabled Parking

- 9.71. London Plan Policy T6.1 outlines that where a proposal has 10 or more units the developer should ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset. The policy further states that the applicant should demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.
- 9.72. The proposal is providing 9 DDA compliant spaces within the under-croft parking which equates 3% of the total provision and is therefore policy compliant. In terms of the additional 7% there is insufficient space on the site to provide additional DDA compliant parking without comprising the overall level of general parking spaces provided. The applicant has been asked to test what maximum number of disabled spaces could be provided and an update will be provided.

Cycling

- 9.73. Residential and commercial cycle parking spaces are located on the ground floor and distributed in 5 cycle stores adjacent to the residential cores. Cycle parking has been provided for both short and long term uses. Short stay cycle parking and visitor parking has been located close to attractors such as the central public realm at the southern end of the site, whilst long stay cycle parking for residents has been identified within bike storage areas placed within the building.
- 9.74. In terms of quantum, the proposal includes 521 spaces for the residential units, 513 of these are long stay and 8 are short stay spaces. The commercial floorspace is provided with 16 cycle spaces in total, 13 of these are long stay spaces whilst 3 are short stay spaces. The provision complies with the London Plan requirements and Condition 57 OPP and is therefore considered acceptable.

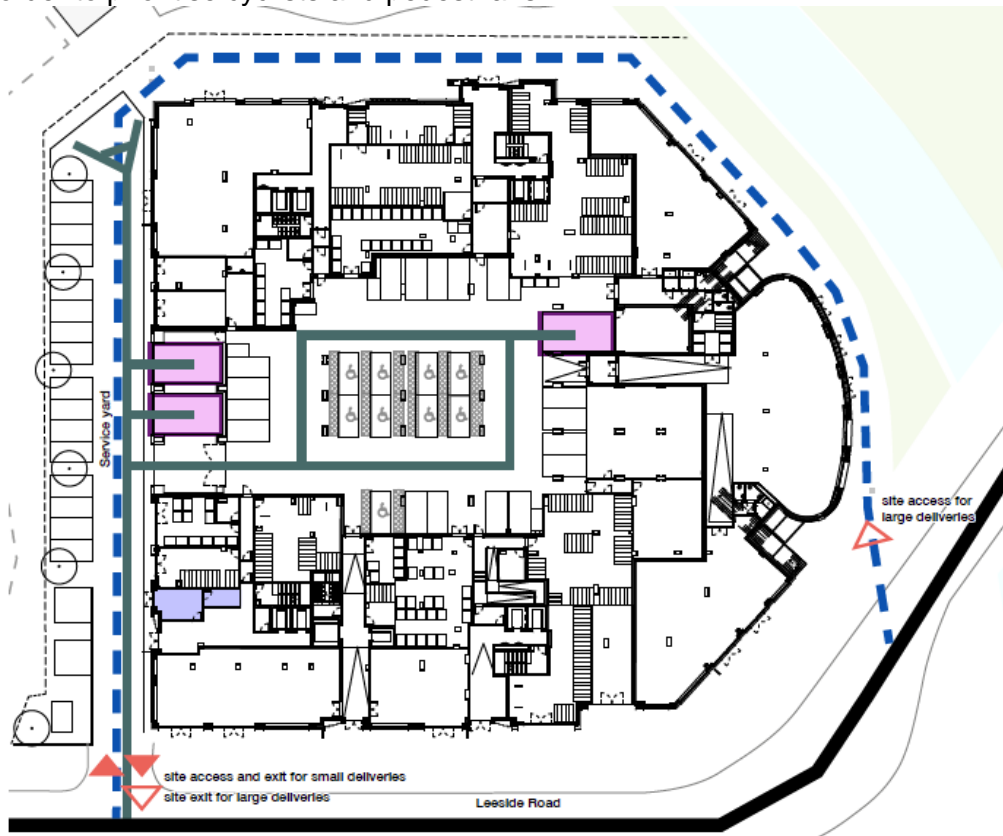
Access

- 9.75. In terms of access, as part of the Strategic Infrastructure Works a cycle route will be provided along Leaside Road to the south of the site. The cycle route is also shown on the parameter plans for the OPP. Leaside Road will also incorporate a main pedestrian route which will enable residents to approach the building entrances from Leaside Road. Each of the 4 residential blocks has its own entrance with additional separate entrance for the commercial units.

Deliveries & Servicing

- 9.76. In terms of deliveries to residential properties once the development is occupied, the Transport Assessment sets out that it expects these deliveries to be carried out by Light Goods Vehicles (LGVs) similar to Amazon and Tesco vans. The proposals

provide 3 loading bays and access into the site is proposed via the Pymmes Brooke entrance for large vehicles who will follow an anti-clockwise route and exit via the service yard onto Leaside Road; small to medium vans will enter and exit the site via the service yard along the south western boundary of the site. There will be an onsite management office to monitor vehicle access into the site and vehicle access beyond the northern end of the service yard will be limited by the use of automatic bollards in order to prioritise cyclists and pedestrians.



- 9.77. Refuse stores are located on the ground floor and are separated for the commercial and residential uses. The residential bin stores comprise general waste bins at 1,100L, recycling bins at 1,280L and shared food waste bins which the Waste Team have recommended are 140L containers. With respect to the quantum of residential bins, the Waste Team are satisfied that the provision will meet the needs of future occupiers. The refuse strategy for the site involves a managed solution whereby bin stores are emptied into collection areas on collection days by a private contractor. The refuse truck will enter the site from the Pymmes Brook access point and exit via the service road on the western boundary of the site onto Leaside Road. Some concerns have been raised with respect to the managed solution, with Waste Officers noting that it will take a significant amount of time to collect the waste and this could result in the podium access being blocked during this time. As such a site waste management strategy will be resubmitted prior to the commencement of the development to ensure the managed solution is effective and that the waste strategy accords with the waste hierarchy in the London Plan and the Local Plan.

Trip Generation

- 9.78. The submitted Transport Assessment includes an assessment of likely trip generation as a result of the proposal. The assessment estimates that the proposal will result in a maximum of 62 vehicular trips per day during peak hours. The assessment notes that the trip generation is based on existing sites from TRICS and therefore may vary

slightly to the actual site. In order to mitigate this, car ownership data and onsite parking provision was included to provide a more realistic calculation which suggested that on average the site would produce 72 movements per day or 2 movements per day per space between 7am – 7pm. Officers consider the level of vehicle trips generated to be commensurate with the scale of the development and level of parking provided.

Flood Risk and Drainage

- 9.79. London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.
- 9.80. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for developments from the perspective of avoiding and reducing flood-risk and the structure and requirements of Flood Risk Assessments (FRAs).
- 9.81. A Flood Risk Assessment (FRA) and Drainage Strategy were submitted with the planning application. The gasholder site falls within Flood Zone 2 which is defined by the Environment Agency as land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding. Notwithstanding this, the updated modelling conducted by ARUP for the OPP confirms the site is not within the fluvial flood plain for the 1 in 100-year storm event plus 35% climate change. The FRA has been submitted with the view to discharge conditions 15, 20 and 32 of the OPP which relate to flood storage area, SuDS/infiltration and surface water and drainage. In terms of flood risk, the Environment Agency (EA) have reviewed the FRA and are satisfied that the proposal will not result in the loss of flood storage area, the condition can therefore be discharged.
- 9.82. With respect to SuDS the Water Management team have recommended that condition 32 (Surface water/infiltration and drainage management plan) of the OPP is not discharged until further information relating to when certain SuDS features will become activated is provided. The discussions are still on-going, and the outcome will determine whether or not the condition can be discharged.

Ecology

- 9.83. The proposals seek to maintain and provide new opportunities for wildlife within the site in accordance with national and local planning policy and guidance. The OPP sought to secure ecological enhancements to the whole of the Phase 2 site and as such attached conditions to the permission requiring each phase to ensure improvements to biodiversity and to demonstrate how existing habitats would be preserved and how new habitats would be created. An Ecological Assessment has been submitted with this application to ensure compliance with conditions 47 (Details of biodiverse/green roofs per phase in compliance with Design Code/ongoing maintenance and management) and 48 (Biodiversity enhancements per phase).
- 9.84. The proposal includes green/blue biodiverse roofing systems on the main roofs for Blocks A, C and D and the podium area. The podium area has depths of 500mm which is sufficient to provide bio-retention areas in the form of rain gardens and swales. The rain gardens will collect flows from the surrounding hard paved areas

and adjacent buildings and will help to significantly reduce runoff during small storm events. The rain gardens will be allowed to infiltrate down and connect to the blue roof and surface water drainage systems below, which will in turn be connected to the high-level surface water drainage system.

- 9.85. In terms of Condition 48, the Ecological Assessment states that the landscaping strategy has incorporated native and fruit-bearing species to provide further opportunities for wildlife. The assessment also states that the landscape design incorporates new habitats into the site including rain gardens, green roofs, wetland planting and wildflower meadow planting which has great benefits for pollinators. The new planting consists of native and non-native species which will also provide increased opportunities for foraging and nestling wildlife. Officers consider the proposed development to provide the necessary ecological enhancements required by the OPP, the information submitted is therefore considered sufficient to discharge Condition 48.

Impact to Epping Forest Special Area of Conservation (SAC)

- 9.86. Natural England informed Councils on 20th September 2018 about the establishment of the Epping Forest Special Area of Conservation (SAC) Strategic Mitigation Strategy. Natural England have established a recreational 'Zone of Influence'. Any residential development (proposing 100 plus units) within 6.2km of the SAC is required to deliver a package of avoidance and mitigation measures as well as make a financial contribution to strategic measures as set out within the costed Strategic Access Management Measures. This is to adequately mitigate, on a site by site basis, any recreational impact on the SAC that is located within the Zone of Influence.
- 9.87. Natural England were consulted on the OPP and a number of measures were subsequently required as obligations for future plots within the shadow S106 agreement. The agreed measures included a SAMM contribution of £14 per residential unit, and a SANG Management Plan which sets out suitable alternative green space to Epping Forest.
- 9.88. Natural England were consulted on this application and advised that although mitigations measures had been agreed with the outline the proposal is required to submit an appropriate assessment. In line with this, the Applicant has submitted a Shadow Habitats Regulation Assessment which Natural England have confirmed they are satisfied with. This is being reviewed by an independent ecologist on behalf of the Council and an update will be provided at the meeting.

Urban Greening Factor (UGF)

- 9.89. Policy G5 of the London Plan sets an Urban Greening Factor target score of 0.4. Condition 76 (Urban Greening Factor) of the OPP also requires a minimum UGF score of 0.4. The applicant has provided an Urban Greening Factor calculation included in the Landscape Design Statement submitted with the application which provides a score of 0.48. Officers are satisfied with this figure given that it exceeds the London Plan target for residential development. Additionally, the information is sufficiently clear in demonstrating how the UGF will be achieved for this phase of development, officers are therefore satisfied that Condition 76 can be discharged.
- 9.90. Overall, the proposal is considered to respect the natural environment and enhance the ecological value and biodiversity of the site through the provision of soft landscaped areas which provide new habitats for wildlife, the proposal is therefore supported in this regard.

Landscaping

- 9.91. The western boundary of the site is relatively constrained by the need to provide parking and servicing functions. The use of a shared surface is supported by officers as this reduces the amount of hard standing required and frees up space for planting. Additionally, the introduction of small planters along the edge of the building provides more greening and softens the appearance of the building.
- 9.92. The western boundary of the site has views over the IKEA service yard which is quite a harsh environment with predominantly hard standing. The proposal provides trees between the parking areas which is supported however, more greening is required to mitigate the dominance of hard standing and parked cars within the site and the IKEA service area. The DAS indicates that a green wall could be provided however, there are currently no details of this, and the opacity of the boundary treatment is unclear. As such, a condition will be added to the decision requiring further details of this area to ensure that sufficient screening is achieved.
- 9.93. In terms of the northern access, officers have encouraged engagement with IKEA to provide an access through the IKEA service road to the north. Officers consider this route to provide a less polluted, better surveilled and more convenient route to the station and retail facilities. It will also set up the conditions for the provision of a street network should the IKEA site come forward for development. Officers acknowledged that removal of the fence and securing access to this street is not within the applicant's gift. Notwithstanding this, the Council are in discussions with IKEA in order to try and secure the access route for pedestrian use in the future. The proposed interim solution - to provide a fence at this stage but anticipate future connections which have been safeguarded by providing access along desire lines to residential cores- is therefore supported.
- 9.94. The eastern boundary has several competing uses, it must accommodate the refuse vehicle, employment spill out and pedestrian movements. However, the proposals strike a good balance between these requirements and the space should be viewed in the context of strong visual connections to the park opposite. Furthermore, the placement of the totems, following the curve of the podium, are strongly supported. These are a key element in reinforcing the character and identity of the site, referencing the historic use as a gas holder. Overall, officers are supportive of the landscaping approach subject to the details requested via condition.

Sustainability and Climate Change

- 9.95. 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.
- 9.96. London Plan Policy SI 2 states that the Mayor of London is committed to London becoming a zero-carbon city which will require a reduction of all greenhouse gases, of which carbon dioxide is the most prominent. The policy further states that boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies and use innovative building materials and smart technologies.

- 9.97. London Plan Policy SI 4 speaks of the need for development proposals to minimise the adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 9.98. Core Policy 20 states that the Council will require all new developments 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. Policy DMD 49 requires all new development to achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability. Policy DMD 51 states that all developments will be required to demonstrate how the proposal minimises energy-related CO₂ emissions and outlines the energy hierarchy that should be followed.
- 9.99. In addition to adhering to the policies outlined above the proposal is seeking to discharge Conditions 49 (Energy statement per phase, to include overheating and cooling) Condition 50 (Renewable Energy Technologies-provision/maintenance/noise assessment per phase) and Condition 53 (Agent of Change) from the OPP with the Reserved Matters.

Minimising Greenhouse Emissions

- 9.100. An Energy Statement was submitted with the Reserved Matters which assesses the sustainability performance of the proposed development against the development plan policies. The statement includes an assessment of the proposed development in accordance with the London Plan “Be Lean, Be Clean, Be Green approach which is outlined below.
- 9.101. With respect to Be Lean, the proposed development has been designed to have a highly efficient envelope and passive strategies have been included in the design where possible. The passive strategies include optimising the orientation and form of the building and using building fabric with high thermal performance. Following the passive measures, the next stage in the hierarchy is to use ‘active design’ use energy efficient building services systems, low energy lighting and controls throughout the scheme to reduce fuel consumption. The measures proposed include space heating which involves connecting the development to the Meridian Water Heat Network to supply space heating and hot water to all residential and commercial units with low carbon heat. Additional measures include providing fresh air via mechanical ventilation units with heat recovery and low energy light fittings.
- 9.102. In terms of Be Clean, the proposal as been designed to allow for a future connection to the proposed Meridian Water Heat Network. The statement advises the connection provides potential to take very low carbon waste heat from new Energy Recovery Facility at Edmonton EcoPark. The Be Green stage seeks to further reduce emissions from the development through the use of renewable energy systems. A number of renewable technologies were assessed for use at the site and photovoltaics (PV panels) were identified as being the most appropriate for the development and have been placed on the top floor roof areas for each of the blocks.
- Overheating*
- 9.103. The proposal has been designed to follow the cooling hierarchy as required by the London Plan Policy SI4 on managing heat risk. The following measures have been incorporated into the development to maintain thermal comfort; openable windows are included to allow natural ventilation, additional flow rates can be also be provided via the mechanical ventilation and for bedrooms/studios that have windows on noise affected elevations additional mechanical air supply and extract is provided to remove

excessive heat gains. Officers consider the measures proposed appropriate to address the issue of overheating on the site.

- 9.104. In summary, the Energy Statement provides an appropriate sustainability strategy that outlines the developments response to climate change and reducing carbon emissions. The Council's Sustainability Team have also been consulted with respect to the proposals and are satisfied that the information submitted is sufficient to discharge the relevant conditions.

Detailed Phasing Plan

- 9.105. Condition 11 of the Outline Planning Permission requires the submission of a detailed phasing plan with each reserved matters application which sets out the timescales for delivery and construction. The Applicant has provided a plan which clearly sets out the timescales for delivery of the public realm, access routes and construction. Officers are satisfied that the information provided is sufficient to discharge the condition.

Green Procurement Plan

- 9.106. The Green Procurement Plan submitted with this Reserved Matters application outlines that there is a commitment to minimising waste during construction and the use of renewable and recycled materials will be promoted. It is considered that the strategy accords with the objective of Condition 31 (Green Procurement Plan) of the OPP and can be discharged.

Wind

- 9.107. An Environmental Impact Assessment was submitted with the OPP and in response to the wind section the requirement of the OPP is that a wind tunnel model or Computational Fluid Dynamics (CFD) modelling should be submitted with the detailed stage of design along with details of any mitigation needed to achieve an acceptable microclimate within the development. The applicant has submitted a CFD report which sets out the microclimatic conditions across the development. The report outlines that mitigation measures will be required in the form of screens, planting and canopies in certain locations. Further tests are required to be undertaken and it is confirmed that these will likely result in further mitigation measures to provide an acceptable microclimate within the site. The wind consultant and the architects have been working together to provide suitably designed solutions that compliment the proposed development. Notwithstanding this, a condition will be attached to the permission requiring details of the proposed further mitigation to ensure they accord with the design principles for the site and address the microclimatic conditions identified to ensure a suitable environment for future residents.

Environmental Statement

- 9.108. A Statement of Compliance has been submitted with this Reserved Matter application which reviews the significance of the effects within the Environmental Statement (ES) submitted with the OPP in 2019 to identify whether they provide a sound basis to understand the likely significant effects of the proposed development. The Statement of Compliance concludes that the proposals are within the parameters of the 2019 ES and no further ES or ES Addendum is required to understand the likely significant effects of the Reserved Matter proposals.

Discharge of conditions

9.109. As this is a reserved matters application, the relevant conditions imposed at the outlined stage remain applicable.

9.110. This application proposes the discharge of the following planning conditions that formed part of original outline application (19/02718/RE3):

- Condition 9 (design code compliance)
- Condition 11 (detailed phasing plan)
- Condition 15 (Flooding)
- Condition 23 (Air Quality)
- Condition 27 (Architectural Detail)
- Condition 29 (Shopfront/signage strategy for retail/leisure/community space)
- Condition 31 (Green Procurement Plan)
- Condition 32 (Surface water/infiltration and drainage management plan)
- Condition 35 (Archaeology) – Approved by Glass
- Condition 36 (Schedule of tenure/mix per phase)
- Condition 37 (Compliance with inclusive access requirements M4(2) (90%) and M4(3) (10%))
- Condition 39 (Public realm strategy - hard and soft landscaping/traffic calming/ street furniture etc)
- Condition 40 (Details of laying out/planting of open spaces/ layout and type of play equipment)
- Condition 43 (Meanwhile security and condition)
- Condition 47 (Details of biodiverse/green roofs per phase in compliance with Design Code/ongoing maintenance and management)
- Condition 48 (Biodiversity enhancements per phase)
- Condition 49 (Energy statement per phase, to include overheating and cooling)
- Condition 50 (Renewable Energy Technologies-provision/maintenance/noise assessment per phase)
- Condition 52 (detailed assessment of wind effects and related mitigation)
- Condition 53 (Agent of Change)
- Condition 54 (Daylight/Sunlight)
- Condition 57 (Cycle parking)
- Condition 58 (Car parking)
- Condition 60 (Details of all access points to the site - materials/detailing)
- Condition 61 (Refuse Facilities)
- Condition 63 (Sound Insulation)
- Condition 76 (Urban Greening Factor)
- Condition 77 (Fire Statement)
- Condition 80 (EIA compliance)

9.111. The issues around the discharge of each of these conditions have been discussed in the appropriate section of this report and officers have concluded that sufficient information has been submitted to approve the discharge of these conditions.

10. Community Infrastructure Levy

10.1 Both Enfield CIL and Mayor of London CIL (MCIL) would be payable on this scheme. The Meridian Water Masterplan area is charged at a nil rate for residential development, therefore the residential floorspace incurs £0 in Enfield CIL. Non-residential and commercial floorspace is charged at the standard borough-wide rate.

A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

11. Conclusion

- 11.1. The principle of development has been established on the site by the OPP. The Reserved Matters application has provided the details for Plot Z02-01 which is a mixed use residential-led development. The proposed use of the site for residential and commercial workspace is supported and in accordance with the outline permission parameter plans.
- 11.2. The proposal is providing high quality design that makes references to the former industrial nature of the site which is supported. The proposal also offers public realm improvements through planting, new seating areas and viewing platforms to the east across Pymmes Brook.
- 11.3. The provision of 100% affordable housing and 30% family housing is supported as it provides homes that address the Borough's greatest need. The homes are also of high quality with 95% of them being dual aspect and all of them benefiting from private amenity space in the form of balcony/terrace and communal amenity space on the first floor podium.
- 11.4. Further to the above the proposal is improving the biodiversity and ecology of the site through the planting of new trees, rain gardens and climbing plants. The proposed soft landscaping features also provide sustainable drainage which is supported.
- 11.5. Overall, the proposal are considered to be compliant with both the strategic and local planning policy frameworks and are supported by officers with significant weight attributed to the provision of high quality affordable housing.