

# Public Document Pack



## PLANNING COMMITTEE

Wednesday, 28th September, 2022  
at 7.00 pm  
Conference Room, Civic Centre, Silver  
Street, Enfield, EN1 3XA

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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](mailto: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 PREVIOUS MEETING (Pages 1 - 4)

To approve the minutes of the meeting held on 6 September 2022 as a true and correct record.

### 4. REPORT OF THE HEAD OF PLANNING (Pages 5 - 8)

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

### 5. 22/00168/OUT - MONTAGU INDUSTRIAL ESTATE, ENFIELD, LONDON, N18 2NG (Pages 9 - 50)

**RECOMMENDATION:**

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.
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: Edmonton Green

**6. 21/04742/FUL - MERIDIAN WATER WILLOUGHBY LANE AND MERIDIAN WAY LONDON N18 (Pages 51 - 132)**

**RECOMMENDATION:**

1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to **NO OBJECTIONS** being received from the Environment Agency, 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.

Ward: Upper Edmonton

**7. 22/00106/FUL - MERIDIAN WATER, KIMBERLEY WAY, LONDON, N18 (Pages 133 - 154)**

**RECOMMENDATION:**

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.

Ward: Upper Edmonton

**8. 20-01815-FUL - 41-52 GILDA AVENUE, ENFIELD, EN3 7UJ (Pages 155 - 244)**

**RECOMMENDATION:**

1. That subject to the finalisation of a S106 to secure the matters covered in this report and to be appended to the decision notice, the



Head of Development Management/ the Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions.

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

Ward: Ponders End

**9. 22-00047-FUL - ENFIELD DISTRICT HEAT NETWORK BETWEEN SOUTHBURY ROAD EN1 HERTFORD ROAD AND ST MARTINS ROAD N9 (Pages 245 - 268)**

**RECOMMENDATION:**

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

Wards: Edmonton Green, Lower Edmonton, Upper Edmonton, Jubilee, Ponders End, Southbury, Carterhatch

**10. FUTURE MEETING DATES**

The future meetings of the Planning Committee would be held the Conference Room, Civic Centre and commence at 7pm.

Tuesday 18 October 2022	
Tuesday 01 November 2022	Provisional
Tuesday 22 November 2022	
Tuesday 13 December 2022	
Tuesday 10 January 2022	Provisional

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## PLANNING COMMITTEE - 6.9.2022

**MINUTES OF THE MEETING OF THE PLANNING COMMITTEE  
HELD ON TUESDAY, 6 SEPTEMBER 2022****COUNCILLORS**

**PRESENT** Sinan Boztas, Elif Erbil, Nawshad Ali, Gunes Akbulut, Kate Anolue, Lee Chamberlain, Peter Fallart, Mohammad Amirul Islam, Bektas Ozer, Michael Rye OBE, Jim Steven and Doug Taylor

**ABSENT** Ahmet Hasan (Associate Cabinet Member (Enfield North))

**OFFICERS:** Joanne Drew (Director of Housing & Regeneration), Brett Leahy (Director of Planning and Growth), Vincent Lacovara (Head of Planning), Andy Higham (Head of Development Management), David B Taylor (Head of Traffic and Transportation), Rebekah Polding (Head of Cultural Services Development), David Gittens (Planning Decisions Manager), Gideon Whittingham (Planning Decisions Manager), Harriet Bell (Heritage Officer), John Hood (Assistant Principal Lawyer), Matilda Harden (Conservation Officer), Michael Kennedy (Principal Urban Designer), Marie Lowe (Secretary)

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

**1****WELCOME AND APOLOGIES****NOTED:**

1. Councillor Boztas (Chair) welcomed all attendees to the meeting and confirmed the meeting procedures.
2. Apologies for absence were received from Councillor Ahmet Hasan, who was substituted by Councillor Bektas Ozer.

**2****DECLARATIONS OF INTEREST**

**NOTED** that there were no declarations of interest.

**3****MINUTES OF PREVIOUS MEETING**

**AGREED** the minutes of the Planning Committee meetings held on 21 June 2022 and 19 July 2022 be confirmed as a correct record.

**4****REPORT OF THE HEAD OF PLANNING**

**PLANNING COMMITTEE - 6.9.2022**

**RECEIVED** the report of the Head of Planning.

**5**

**22/01722/FUL - 68 CHALFONT ROAD, LONDON, N9 9LY**

1. The introduction by Gideon Whittingham (Planning Decisions Manager), clarifying the proposals.
2. The deputation of Kenneth Orji, agent on behalf of the applicant who spoke against the officer's recommendation.
3. There were no deputations made to speak in favour of the officer's recommendation.
4. The Planning Decisions Manager clarified the reasons for the recommendation for refusal which included lack of amenity space, the proposed bedroom sizes which could accommodate more people than indicated in accordance with national standards on bedroom sizes leading to more people who could occupy the completed dwelling irrespective of that indicated in the plans, the poor internal layout of the conversion resulting in bedrooms being below living rooms and vice-versa, which would impact on the amenities of the future occupants of the rooms. Further, Gideon Whittingham outlined that the proposed development would result in a cluster of more than one out of a consecutive row of five units being converted into self-contained flats, which would be contrary to policy and detrimental to the character of the area and that the scale, mass, design of the proposed extensions would impact on the amenities of the immediate neighbouring property.
5. The Planning Decisions Manager, responding to a comment from a member of the Planning Committee about pre application advice, referred to paragraphs 9.2 and 9.5 of the report which set out the advice provided to the agent regarding the issues raised in the report and the reasons for refusal.
6. A motion was proposed by Cllr Gunes Akbulut, and seconded by Cllr Mohamed Islam, against the officers' recommendation to refuse planning permission stating that the focus should be on the NPPF, the London Plan and the Local Plan.
7. Officers, through discussion with Members, clarified the appropriate conditions which could be imposed if the Committee was minded to grant planning permission, which included time limited, approved drawings, materials, details of refuse storage and car parking, surface water drainage, energy statistics, energy performance certificate and potable water.
8. The motion was accepted with 7 votes for and 5 against. Planning permission granted subject to conditions.

**AGREED:**

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 for approval.

**6**

PLANNING COMMITTEE - 6.9.2022

**22/00746/FUL - 161 FORE STREET, LONDON, N18 2XB**

1. The introduction by Gideon Whittingham (Planning Decisions Manager) clarifying the proposal, and what has been installed on site which resulted in permission being sought retrospectively for the works.
2. The Planning Decisions Manager confirmed that the works had been completed before the application had been received and that each application even those which are retrospective, must be considered on its own merits and assessed by officers in the usual way.
3. The unanimous support of the Committee for the officers' recommendation.

**AGREED:**

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.

**7**

**22/01189/VAR - THOMAS HARDY HOUSE 39 LONDON ROAD ENFIELD EN2 6DS**

1. The introduction by David Gittens (Planning Decisions Manager), clarifying the proposal and the scheme, together with an additional condition requiring details of the proposed canopy over main entrance. Delegated authority was also requested to enable the Head of Traffic and Transportation to confirm the stopping up of the highway which forms part of this proposal.
2. Officers, responding to questions from Members, advised that the planting shown in the drawings for the wider highway was indicative only and did not form part of the application. It was also confirmed that the external seating would require a separate stopping up order and the seating beyond this defined area would not be permanent and would be subject to a separate licence / highways consent application. Officers advised that the whole area would be designed to be more attractive and inviting to provide a more positive experience. Although the Police had not been consulted, it was the intention to design out any anti-social behaviour.
3. Officers were satisfied that the proposed relocation of the doorway and external seating, taking account the location of the nearby bus stops, would not interfere or hinder those with sight or mobility issues as there was sufficient footway width for pedestrian traffic to flow past.
4. The support of the majority of the Committee for the officers' recommendation was 11 votes for and 1 abstention.

**AGREED:**

1. In accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions.

**PLANNING COMMITTEE - 6.9.2022**

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. That the Head of Traffic & Transportation be granted delegated authority to confirm the stopping up of the highway which forms part of this proposal.

**8**

**FUTURE MEETING DATES**

The dates of future meeting, which would commence at 7.00pm and held in the Council Chamber at the Civic Centre were noted as follows:

Tuesday 20 September 2022

Tuesday 18 October 2022

Tuesday 01 November 2022 \* Provisional

Tuesday 22 November 2022

**London Borough of Enfield****Committee: PLANNING COMMITTEE****Meeting Date: 28<sup>th</sup> September 2022**

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

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**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, 208 applications were determined between 24/08/2022 and 14/09/2022, of which 179 were granted and 29 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.

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

**Date of report: 15.09.2022**

**Appendices**

None.

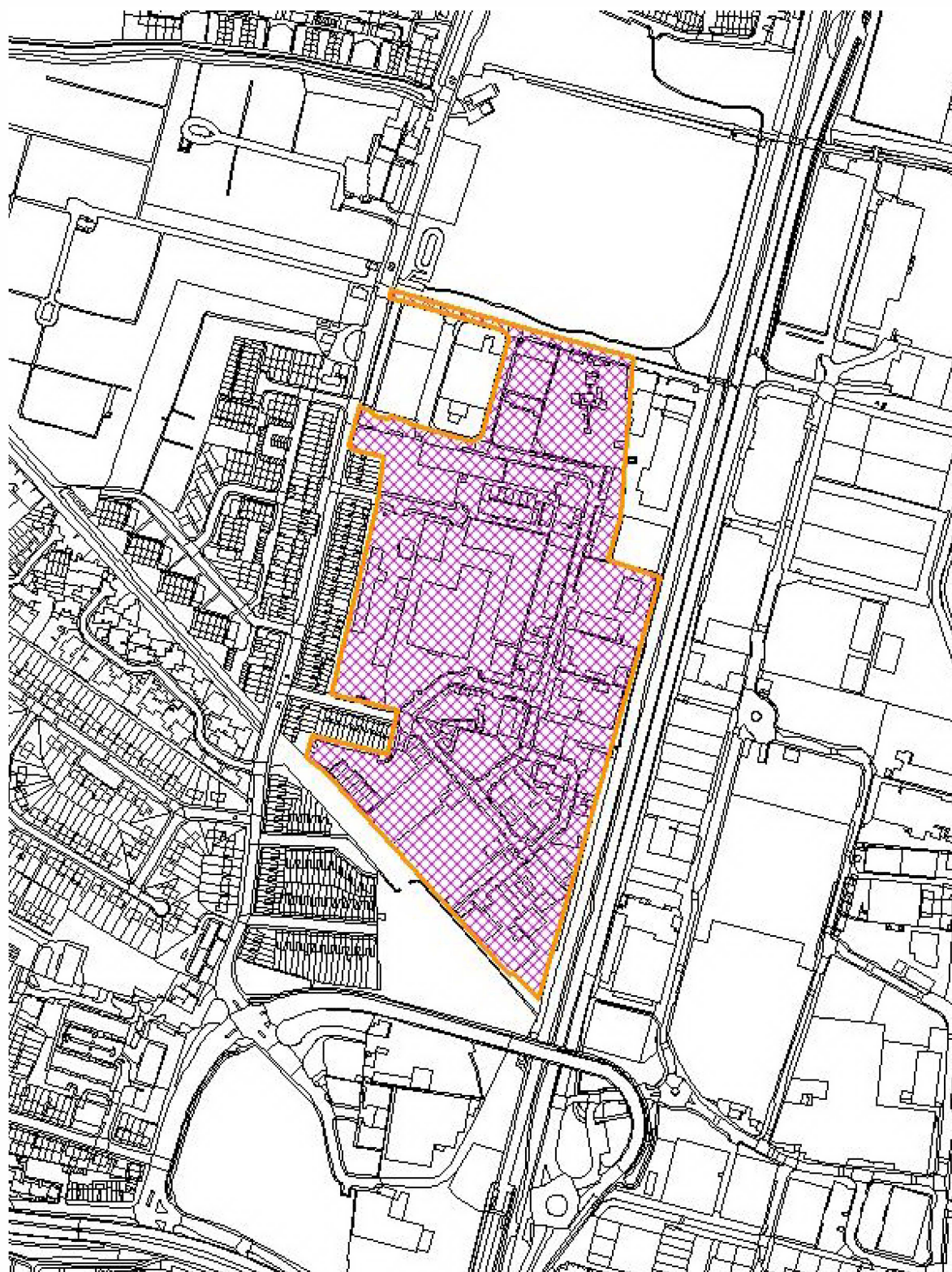
Background Papers

To be found on files indicated in Schedule.

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<b>LONDON BOROUGH OF ENFIELD</b>		
<b>PLANNING COMMITTEE</b>		<b>Date:</b> 28th September 2022
<b>Report of:</b> Head of Planning – Vincent Lacovara	<b>Contact Officer:</b> Andy Higham Gideon Whittingham Tendai Mutasa	<b>Ward:</b> Edmonton Green
<b>Application Number:</b> 22/00168/OUT		<b>Category:</b> Major
<b>LOCATION:</b> Montagu Industrial Estate, Enfield, London, N18 2NG		
<b>PROPOSAL:</b> Hybrid Planning Application, including demolition of existing buildings and structures, comprising: (1) Full Planning Application for a waste management area (Use Class B2) and associated works; and (2) Outline Planning Application for the comprehensive redevelopment of Montagu Industrial Estate to provide B2, and B8 uses, alongside ancillary uses (Use Class E), a concrete batching plant (Use Class B2) and associated infrastructure. (All matters reserved)		
<b>Applicant Name &amp; Address:</b> Henry Boot Developments Ltd c/o Knight Frank 55 Baker Street London W1U 8AN United Kingdom		<b>Agent Name &amp; Address:</b> Knight Frank 55 Baker Street London W1U 8AN United Kingdom
<ol style="list-style-type: none"> <li><b>RECOMMENDATION:</b> 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 <b>GRANT</b> planning permission subject to conditions.</li> <li>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.</li> </ol>		

Ref: 22/00168/OUT LOCATION: Montagu Industrial Estate, Enfield, London, N18 2NG



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North



**1. Note for Members**

- 1.1** This planning application is categorised as a “major” planning application and in accordance with the scheme of delegation, is reported to Planning Committee for determination and further to this, the Council has interest in the land as freeholder.

**2. Recommendation**

2.1 That subject to

- i) the Stage 2 referral of the planning application to the Mayor for London and no objection being raised;
- ii) the completion of a legal agreement

the Head of Development Management be authorised to GRANT planning permission subject to the following conditions in respect of the following

- (1) Full Planning Application for a waste management area (Use Class B2) and associated works; and
- (2) Outline Planning Application to provide B2, and B8 uses, alongside ancillary uses (Use Class E), a concrete batching plant (Use Class B2) and associated infrastructure

Conditions

1. FULL - Development to be begun within 3 years

2. Outline - A subsequent application for the approval of any reserved matters (all matters reserved) must be made to the Local Planning Authority not later than (a) the expiration of three years beginning with the date of this decision notice and (b) the development to which this permission relates must be begun not later than the expiration of two years from the final approval of the last reserved matter to be approved.

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

3. Outline - Details of the,

- a) scale,
- b) layout,
- c) landscaping (including soft and hard landscaping),
- d) appearance (including materials for the dwellings and means of enclosure) and
- e) access

(hereinafter called "the reserved matters") shall be submitted to and approved in writing by the Local Planning Authority before any development begins and the development shall be carried out as approved.

Reason: To prevent the accumulation of un implemented planning permissions, to enable the Local Planning Authority to review the suitability of development

in the light of altered circumstances and to comply with the provisions of Section 92(2) of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

4. All phases - Development to be in accordance with approved plans
5. All phases - Details of external materials – sample brick panels on site
6. All phases - Details of all roofs and accessible decks.
7. All phases - Details of all surfacing materials
8. All phases - Contamination – remediation Strategy
9. All phases - Noise attenuation between all commercial units
10. All phases - Noise attenuation and ventilation – details of window specifications and mechanical ventilation arrangements.
11. All phases - Opening hours of commercial units
12. All phases - Details of fixed mechanical plant and any associated acoustic screening
13. All phases - Ventilation/extraction details – commercial units
14. All phases - Accessible buildings – (%age) of dwellings to be built as ‘wheelchair user’
15. All phases - (M4(3)), with all others being ‘accessible & adaptable’ (M4(2))
16. All phases - Details as per Fire Strategy Statement to be implemented
17. All phases - Details of landscaping, public realm, play space and equipment, private amenity space
18. All phases - Details of biodiversity enhancement measures (including bat boxes, bird boxes & ‘insect hotels’), boundary treatments & wind mitigation measures
19. All phases - Provision of cycle parking spaces as set out in approved plans
20. All phases - Provision of car parking as set out in Transport Assessment/approved plans
21. All phases - Car Parking Management Plan
22. All phases - Delivery & Servicing Plan
23. All phases - Secured by Design
24. All phases - Elevation details 1:20
25. All phases - Flood Risk Management Technical Note
26. All phases - Flood Verification Report
27. All phases - No plumbing or pipes
28. All phases - Construction Environmental Management Plan

29. All phases - Non-Road Mobile Machinery (PRE-COMMENCEMENT)
  30. All phases - Construction Logistics Plan (inc. delivery times))
  31. All phases - Site Waste Management Plan (PRE-COMMENCEMENT)
  32. All phases - Thames Water - Impact Piling Restriction
  33. All phases - Thames Water – Network Pressure
  34. All phases - Clearance outside of bird nesting season
  35. All phases - Implementation of Ecological Report recommendations
  36. All phases - Details of Ecological Enhancements
  37. All phases - Tree/ Landscaping Condition(s)
  38. All phases - BREEAM accreditation
  39. All phases - Submission of BREEAM Rating Verification
  40. All phases - Submission of Energy Performance Certificate
  41. All phases - External Lighting Plan
  42. Waste Site Re-provision
  43. All phases - Resolve precise wording of design code post determination.
  43. All phases - Network Rail Conditions
  43. All phases - Post-Completion Reporting to GLA
- 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 report seeks approval for redevelopment involving the demolition of the existing buildings on site and the provision of up to 40,000 sq. m. (GIA) of employment floorspace (Use Classes B2 and B8), alongside a concrete batching plant and ancillary uses. This includes re-provision of a 8,014 sq. m. waste facility, for which full planning permission is sought.
- 3.2 The proposed development would constitute a net increase of circa 17,902 sq. m. (GIA) of employment floorspace. When taken alongside the recently consented Phase One development, the comprehensive redevelopment of the Montagu Industrial Estate will deliver a total increase of 23,349 sq. m. (GIA) of employment floorspace. This represents a 105% increase in GIA.
- 3.3 The application follows a previous application by the same applicant for the redevelopment of the western side of this site to provide 9no. industrial units,

operating under Use Classes B1(c), B2 and/or B8 together with associated infrastructure, access and landscaping. This constitutes Phase 1.

3.4 The scheme has been subject to extensive pre-application discussions with the Council's planning team, the Design Review Panel, the GLA and local stakeholders, to deliver a high-quality form of development with a high standard of architecture.

3.5 The reasons for recommending approval are:

- i) The proposed development would be consistent with the previous use of the site and well-established business and employment activities of the wider Montagu Industrial Estate. The proposed development would be consistent to the recently approved Phase 1 scheme on the site.
- ii) The proposed development would be consistent with the objectives of national, regional and local policy in terms of supporting and securing sustainable growth and employment opportunities within the borough;
- iii) The proposed redevelopment would result in the provision of high-quality, fit for purpose industrial buildings and deliver a net increase in employment floorspace, that would enhance the visual appearance of the site and signify the continuity of the regeneration ambitions for the Montagu Industrial Estate;
- iv) The redevelopment of the site would potentially provide employment opportunities with the proposed development potentially supporting between 695 and 1,000 FTE jobs.
- vi) The development would improve the local environment and improve the setting of adjacent Montagu Road (Cemeteries), Conservation Area to the west of the site;
- vii) The development would encourage sustainable methods of transport with sheltered cycle parking, car parking bays and passive electric bays and connect to the local cycle network.
- x) A decentralised energy network would provide a sustainable means of providing energy and help reduce climate change;
- xi) the scheme integrates flooding and SuDs mitigation measures to manage any offsite impacts.
- xii) Development designed to Secure by Design standards

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

4.1 Montagu Industrial Estate is situated on Montagu Road and is designated as a Strategic Industrial Location (SIL) (to the north) and Locally Significant Industrial Site (LSIS) (to the south). The Site has been allocated for redevelopment within the Edmonton Leaside Area Action Plan (ELAAP). ELAAP Policy EL15 (Improving Existing Industrial Areas) explains that the Council will: "Support regeneration at Montagu Estate to improve outdated infrastructure and to provide new buildings that will meet modern business needs, potentially through a joint venture partnership between the Council and private developer interests".



- 4.2 To the west of the site the area is predominately residential. Tottenham Park Cemetery is also located on the opposite side of Montagu Road and this is designated as conservation area. Directly to the north of the site is recreational green space known as Montagu Recreation Ground. Montagu Recreation Ground contributes to the biodiversity and leisure opportunities in this part of the borough, forming part of the green chain corridor, being a designated Site of Borough Importance for Nature Conservation, designated local open space and is home to a wildlife corridor
- 4.3 The site is part of the Edmonton Leaside Area Action Plan (ELAAP) which estimates that there are 50 units on the site including uses such as car repair shops, garages, a wedding venue, concrete batching plant, metal works and general industrial and small-scale manufacturing uses. The ELAAP suggests that the majority of occupiers on the site are local businesses, supplying Enfield and north London.
- 4.4 The existing wedding venue on site is currently operating without the benefit of planning permission following the expiry of temporary planning permission in 2017.
- 4.5 The site also contains a church (The King's House (London's Alive Church), which is established/lawful use although not consistent with the Site's allocation as SIL.
- 4.6 The Liverpool Street – Cambridge / Stansted main line bounds the Industrial Estate to the east.
- 4.7 Vehicular access for cars, cycles and HGVs would be via the main estate access on Montagu Road onto Princes Road, where primary access to Montagu Road provides access to and from the A406 with a connection further to the north onto Meridian Way with further links north to the M25. Public transport connections are provided close to the site with bus stops located along Montagu Road in both directions. The PTAL Level of the site is 1B.
- 4.8 The site is located within Flood Zones 2 and 3, which means medium to high risk of flooding.

## **5. Proposal**

- 5.1 This is a hybrid planning application containing both detailed and outline elements. The hybrid proposal is for the redevelopment of the site which includes the demolition of existing buildings and structures, involving

(1) a full Planning Application for a waste management area (Use Class B2) and associated works; and

(2) Outline Planning Application to provide a range of industrial units for B2, and B8 uses, alongside ancillary uses (Use Class E), a concrete batching plant (Use Class B2) and associated infrastructure

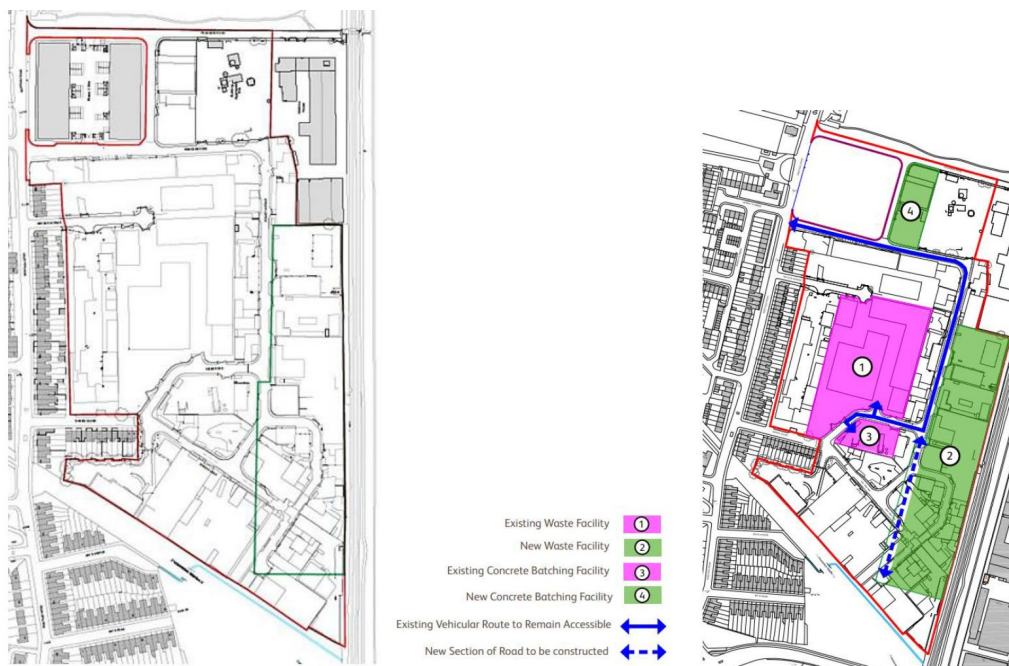
### **5.2 The Detailed Element**

This comprises the eastern portion of the site (1.85 hectares) and proposes to re-provide an existing 1.46 hectare waste facility located centrally on the site.

The proposed 8,014 sq.m. waste facility (Class B2) would comprise a waste sorting facility, vehicle workshop, welfare and office space. The storage/warehouse space would rise to approximately 17.7 metres (AOD height of 30 metres). The adjoining two-storey office would have height of approximately 8 metres (AOD height of 21 metres). The applicant has proposed 50 car parking spaces including 4 blue badge spaces, with 17 long-stay cycle parking spaces and 8 short-stay for this element of the application.

### 5.3 The Outline Element

This comprises the remainder of the site (approximately 10 hectares) and proposes the delivery of up to 40,000 sq.m. of employment floorspace (Class B2 and B8) alongside ancillary facilities in buildings up to 28 metres in height. The application is accompanied by Parameter Plans, and a Design Code. In terms of design, the indicative plans show that the proposed building elevations will be largely composed metal composite cladding with two varying sheet profiles in two contrasting colours which are arranged to help break-down the building mass. Just like the recently approved phase 1 planning application, the proposed units would vary in size to meet the differing needs of future occupants and can be adapted to increase or decrease floor areas to offer flexibility with unit sizes.



Figures 1 and 2: Full planning application (green) and outline planning application (red) boundaries; Relocation strategy for existing waste and concrete batching facilities

- 5.4 On all the frontages, a landscape buffer would sit between the back edge of the footpaths and the perimeter fencing. The landscaping would soften the building edge and provide screening at lower levels and assist with the boundary security.
- 5.5 Energy supplies to the site could ultimately be via a decentralised energy network (DEN), which would service the entire estate. In the interim, Energetik (DEN operator) would provide a prefabricated boiler plantroom at the estate to

act as the heat source in the short term until the heat network is extended to the Montagu Estate in 2023.

- 5.6 This application is part of a wider joint venture between the Council and Henry Boot (the applicant) for the redevelopment of Montagu Industrial Estate.

## **6. Relevant Planning History**

- 6.1 17/03618/PADE: Demolition of buildings. Prior Approval Not Required
- 6.2 19/01348/SO Environmental Impact Assessment Screening Opinion Request under Part 2, Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to phased redevelopment of the site involving demolition and clearance of existing buildings and erection of various 2-storey buildings for industrial and warehouse use together with reconfigured internal access roads, car parking, associated infrastructure and planned plant and landscaping; relocation of two existing cement works to the south of the site in place of the existing waste metal recycling plant. Not required: 14.05.2019
- 6.3 19/03036/FUL - Erection of 9no. industrial units, operating under Use Classes B1(c), B2 and/or B8 together with associated infrastructure, access and landscaping. – Granted 11.10.2020

## **7. Consultation**

### Public:

- 7.1 Consultation letters were sent to 550 neighbouring and nearby properties. Four responses were received which raised all or some for the following points:

Increase in heavy trucks  
Appears overdevelopment  
Inadequate information has been submitted regarding number of jobs  
Loss of existing jobs  
Retention of the waste site is undesirable  
Development is displacing existing businesses  
Existing buildings not assessed properly  
Local markets should detect replacement industries

### External Consultees:

- 7.2 Enfield Disablement Association – no response.
- 7.3 Environment Agency – No objection
- 7.4 London Fire & Emergency Planning – No objection
- 7.5 Metropolitan Police Secure by Design Service – Secure by Design condition to be attached to any consent.
- 7.6 Thames Water Authority – No objection subject to conditions.
- 7.8 Greater London Authority – The Stage 1 response was supportive of the scheme highlighting the economic and employment benefits. A number of

issues were raised on the following point which have been addressed in the relevant sections:

- Trees
- Car Parking
- Circular Economy

Following further discussion with the GLA and the applicants, it was agreed that the above points can appropriately be dealt with via conditions in order to meet the requirements of GLA reporting at Stage 2

Internal Consultees:

- 7.9 Economic Development – No response but an Employment Skills Strategy will be required, that will need to be secured by way of a legal agreement.
- 7.10 Energetik – no objection but must make provision for future connection
- 7.11 Environmental Protection – No objection subject to conditions
- 7.12 Regeneration, Leisure and Culture – No response
- 7.13 SUDS Highways Service – No objection subject to conditions.
- 7.14 Transportation – No objection subject to a legal agreement, S278, Stopping Up Order and conditions.
- 7.15 Waste Officer – No objection subject to a legal agreement to secure re-provision of site prior to demolition
- 7.16 Enfield Design Review Panel – Although there was an initial concern regarding the original iteration of the scheme, the majority of these issues have been resolved through amendment and the design code.

**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

8.2 National Planning Policy

National Planning Policy Framework (NPPF) 2021  
National Planning Practice Guidance (NPPG)

8.3 London Plan (2021)

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

GG1 Building strong and inclusive communities  
GG2 Making the best use of land  
G6 Biodiversity and access to nature  
G7 Trees and woodlands  
D4 Delivering good design  
D12 Fire safety  
D14 Noise  
Policy E2 Providing suitable business space  
Policy E3 Affordable workspace  
Policy E4 Land for industry, logistics and services to support London's economic function  
Policy E5 Strategic Industrial Locations (SIL)  
Policy E6 Locally Significant Industrial Sites (LSIL)  
Policy E7 Industrial intensification, co-location and substitution  
H9 Ensuring the best use of stock  
SI 2 Minimising greenhouse gas emissions  
SI 3 Energy infrastructure  
SI 4 Managing heat risk  
SI 5 Water infrastructure  
SI 12 Flood risk management  
SI 13 Sustainable drainage  
Policy SI 7 Reducing waste and supporting the circular economy  
Policy SI 8 Waste capacity and net waste self-sufficiency  
Policy SI 9 Safeguarded waste sites  
M1 Monitoring  
T2 Healthy Streets  
Policy T1 Strategic approach to transport  
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 T6.5 Non-residential disabled persons parking

Policy T7 Deliveries, servicing and construction

#### 8.4 Core Strategy

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

SO1	Enabling and focusing change
SO2	Environmental sustainability
SO6	Maximising economic potential
SO7	Employment and skills
SO8	Transportation and accessibility
SO10	Built environment
CP9	Supporting community cohesion
CP13	Promoting economic prosperity
CP14	Safeguarding Strategic Industrial Locations
CP16	Taking part in economic success and improving skills
CP20	Sustainable Energy Use and Energy Infrastructure
CP24	The road network
CP25	Pedestrians and cyclists
CP26	Public transport
CP27	Freight
CP28	Managing Flood Risk Through Development
CP29	Flood Management Infrastructure
CP30	Maintaining and improving the quality of the built and open environment
CP31	Built and Landscape Heritage
CP32	Pollution
CP36	Biodiversity
CP39	Edmonton

#### 8.5 Development Management Document

The 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 19	Strategic Industrial Locations
DMD 21	Complementary and supporting uses within SIL and LSIS
DMD 22	Loss of employment outside of designated areas
DMD 23	New employment development
DMD 37	Achieving high quality and design-led development
DMD 38	Design process
DMD 39	The design of business premises
DMD44	Conserving and Enhancing Heritage Assets
DMD 45	Parking standards and layout
DMD 46	Vehicle crossovers and dropped kerbs
DMD 47	Access, new roads and servicing

DMD 48	Transport assessments
DMD 50	Environmental assessment methods
DMD 51	Energy efficiency standards
DMD 53	Low and zero carbon technology
DMD 55	Use of roof space/ vertical surfaces
DMD 56	Heating and cooling
DMD 57	Responsible sourcing of materials, waste minimisation and green procurement
DMD 58	Water efficiency
DMD 59	Avoiding and Reducing Flood Risk
DMD 60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD62	Flood Control and Mitigation Measures
DMD 64	Pollution control and assessment
DMD 65	Air quality
DMD 66	Land contamination and instability
DMD 68	Noise
DMD 69	Light pollution
DMD 81	Landscaping

#### 8.6 Other Material Considerations

- Upper Lee Valley OAPF
- Enfield Leaside Area Action Plan (2020)
- Enfield Characterisation Study
- Manual for Streets
- Mayors Transport Strategy (May 2010)
- Revised Technical Standards for Footway Crossovers (April 2013)
- Refuse and Recycle Storage Guide Enfield (ENV 08/162)
- Travel Planning for new development in London 2011 (TfL)
- Manual for Streets 1 & 2, Inclusive Mobility 2005 (DfT)
- GLA Industrial Intensification and Co-Location Study (2017)

#### 8.7 Enfield Draft New Local Plan

Work on a New Enfield Local Plan has commenced so the Council can proactively plan for appropriate sustainable growth, in line with the Mayor of London's "good growth" agenda, up to 2041. The Enfield New Local Plan will establish the planning framework that can take the Council beyond projected levels of growth alongside key infrastructure investment.

- 8.8 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. However, in terms of direction, the draft Reg 18 plan allocates the estate for comprehensive redevelopment.

9.1 The principal issues that are addressed in relation to this scheme are:-

1. Principle and Land Use;
2. Design;
3. Amenity;
4. Transport;
5. Refuse, Waste and Recycling;
6. SuDS/Flood
7. Sustainability;
8. Biodiversity;
9. Secure by Design
10. Business, Employment and Skills
11. Planning Obligations; and
12. Community Infrastructure Levy.
13. Re-provision of waste site
14. Legal Agreement

#### Principle of Development

- 9.2 Montagu Industrial Estate is a designated strategic industrial location (SIL) (to the north) and Locally Significant Industrial Site (LSIS) (to the south), and this development proposes to improve the functionality and appearance of the site by re-providing new modern industrial units together with a new waste site with associated works. The proposed works would result in significant improvements to the appearance and overall environment of the existing industrial estate
- 9.3 Policy DMD 19 (Strategic Industrial Locations) alongside Policy E5 of the London Plan (2021) seeks to protect and support appropriate industrial development and the estate constitutes a preferred industrial location wherein proposals involving general and light industry, storage and distribution waste management and other industrial related activities including appropriate ancillary uses will be permitted. DMD 19 also confirms that proposals involving a loss of industrial capacity will be resisted.
- 9.4 The London Plan 2021 seek to improve the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises. Having regard to opportunities this proposal will bring to the area it is considered to be a 'good fit' and would increase the role of industrial functions in the area, therefore be in accordance with the aims of the London Plan.
- 9.5 The proposed development would be consistent with the previous use of the site and would further support the benefits being delivered by Phase 1 of the redevelopment of Montagu Industrial Estate redevelopment. It is clear therefore that in principle, the redevelopment of the site is wholly compatible with national, regional and local policy. Its delivery is most welcomed. As such, given the significant improvements that would occur as a result of the development together with future employment opportunities, the application is supported in principle, subject to further assessment of matters within this Committee Report.

#### Land Use



- 9.6 In terms of land use, London Plan Policies seeks to address constraints and opportunities in the economic growth of outer London so that it can rise above its long-term economic trends. In addition, London Plan Policies seek to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, and support and promote outer London as an attractive location for national government as well as businesses.
- 9.7 In particular Policy E7 (Industrial Intensification, Co-Location and Substitution) encourages a proactive approach to intensification through:
- i) introduction of small units
  - ii) development of multi-storey schemes
  - iii) addition of basements
  - iv) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary
- 9.8 In this instance, through design and a more efficient use of land, the proposed development would constitute a net increase of circa 17,902 sq. m. (GIA) of employment floorspace. When taken alongside the recently consented Phase One development, the comprehensive redevelopment of the Montagu Industrial Estate will deliver a total increase of 23,349 sq. m. (GIA) of employment floorspace. This represents a 105% increase in GIA. The development would also present a significant improvement in the appearance of the site and its setting within the wider area
- 9.9 As per the design and access statement submitted with this application, the quantum in the indicative site layout diagram provides circa 40,000sqm as traditional single storey Industrial buildings with first ancillary offices, and is made up broadly as follows;
1. Development Zone 1 - Small to Medium industrial units of approximately 5,000sqft/465sqm up to 40,000sqft/ 3,800sqm.
  2. Development Zone 2 - Small - Medium industrial units of approximately 18,700sqft/ 1,750sqm.
  3. Development Zone 3 - Small industrial units (Terraced) of approximately 7,700sqft/ 715sqm.
  4. Development Zone 4 - Potential for stacked units of approximately 16,800sqft/1485sqm up to 40,000sqft/ 3,800sqm.
  5. Class E(b) (formally A3) Food and Beverage unit.
- It must also be noted that the units have been flexibly designed to meet operator demand
- Class E(b) (formally A3) Food and Beverage unit.
- 9.10 The application proposes a food and beverage use to replace an extant, well used provision on site. The illustrative scheme demonstrates a unit could be located on Montagu Road at the principal entrance to the estate and elsewhere

within the main area of the outline application, shown at the cycle and active travel route to Angel Walk. This provision is beneficial as it provides a purpose built, high quality place for the workforce on the site to meet providing a social and amenity function. This should be considered an ancillary use and a minimum floor area for the future reserved phases.

#### Re-provision of Waste Sites

- 9.11 The detailed element of the scheme comprises a Waste Management Area, whereby existing waste capacity across the Estate will be consolidated. London Plan Policy SI 8 states that in order to manage London's waste sustainably, the equivalent of 100% of London's waste should be managed within London (i.e. net self-sufficiency) by 2026. Further to this London Plan Policy SI9 is clear that all existing waste management sites (defined as land with planning permission for a waste use or a permit from the Environment Agency) should be safeguarded.
- 9.12 Furthermore, Policy SI 9 of the London Plan states that waste plans should be adopted before considering the loss of existing waste sites, and that the proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London, at or above the same level of the waste hierarchy and at least meet the maximum achievable throughput of the site to be lost.
- 9.12 The applicant has identified six waste sites within the application boundary. These are identified and safeguarded locally by the recently adopted North London Waste Plan (2022). In the GLA pre-application response (GLA ref: 2020/6362/P2i/TF), the applicant was asked to provide details regarding the operation of these sites, including any other waste sites currently accommodated on the site that are not safeguarded by the waste plan, their current capacity, and how they would be re-provided/relocated/consolidated as part of the redevelopment of the site.
- 9.14 The submitted waste report and planning statement with the current planning application state that of the six sites, three relate to recycling; two are transfer stations; and, one site is not subject to an extant environmental permit or planning permission for waste use. Whilst the latter site would not meet the definition of a waste site within London Plan paragraph 9.9.1, it is understood that the site has been identified for safeguarding by the North London Waste Plan (2022). As a result, it needs to be included within the approach to the re-provision of waste facilities on site.
- 9.15 As a result, a report detailing the Provision of Compensatory Capacity for the release of 'Existing Waste Sites' in the North London Waste Plan has been submitted with this application. The report has been reviewed by the Council's Waste Plan officer who after extensive discussions with the Applicants is satisfied that sufficient replacement waste capacity has been met to address the requirements of waste site safeguarding policy and in particular how the requirement for compensatory capacity that follows from policy are addressed.
- 9.16 According to the report, a compensatory capacity requirement has been arrived at following a detailed assessment that has considered the following:

- review of waste throughput of each site in last 5 years by type/category
- characterisation of the nature of the waste operation taking place at each site
- case studies of waste management facilities in London similar to that intended to be re-provided demonstrating minimum practically achievable annual throughputs.

9.17 The Council's waste plan officer has concluded that the proposed waste re-provision on a plot of 1.95 hectares would be capable of managing at least the target compensatory capacity of c142,000 tonnes per annum exceeding the target recycling rate of 70%. Therefore, the proposed provision would be more than sufficient to meet the requirement to provide compensatory capacity set out in Policy SI9 of the London Plan and Policy 1 of the North London Waste Plan. This aspect of the scheme is therefore considered acceptable subject to conditions and a legal agreement for its implementation.

#### Community Uses

9.18 Policy S1 of the London Plan sets out that development proposals that seek to make the best use of land, including the public-sector estate, should be encouraged and supported.

9.19 Policy S1 (Developing London's Social Infrastructure) seeks to protect community facilities unless 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or; 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.

9.20 This is consistent with Policy DMD 17 (Protection of Community Facilities) states that existing community facilities will be protected and only permitted where suitable replacement is provided or there is evidence to support it is not required.

#### *Banqueting Suite / Wedding Venue*

9.21 The banqueting suite / wedding venue at 4 Princes Road was given temporary permission which has now expired. The tenants are aware of the intentions to redevelop the site which would not include the re-provision of this use. Although Policy S1 of the London Plan and Policy DMD 17 has been considered, the current use is clearly unauthorised and would be unlikely to receive favourable consideration should a future application to retain be received. This is because the use is not compatible with the SIL designation with Policy E5 stating that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. When considered in conjunction with the aspiration to intensify the use of existing industrial sites, a non-industrial use such as this cannot be readily supported notwithstanding the aspiration of the Council to redevelop Montagu Industrial Estate.

9.22 Moreover, it is evident from the Upper Lee Valley OAPF and Edmonton Leaside AAP that Montagu Industrial Estate has been retained as a focus for industrial intensification to support an increase in net additional jobs. Therefore, the

proposed loss of the currently unlawful wedding venue would comply with Policy S1 in terms of the proposed loss of social infrastructure.

- 9.23 In light of the above and giving weight in the overall planning balance to the unauthorised status of the existing banqueting suite and the employment benefits linked to the improved industrial units on this designated strategic industrial land, it is considered the loss of the banqueting suite does not represent a ground to refuse planning permission. As such, re-provision should not be sought under London Plan Policy S1 and DMD Policy 17.

#### *Church*

- 9.24 Notwithstanding the above, the existing Church on the site does have the benefit of an extant planning permission and having regard to Policy S1 of the London Plan and DMD Policy 17, re-provision is a material consideration. It is noted that the applicant is working with the Church to find alternative premises and this will be secured by a legal agreement. Re-provision off site will allow for the church to be located in a more accessible, central location (as encouraged by planning policy), whilst also enabling the comprehensive redevelopment of Montagu Industrial Estate, to maximise the delivery of new employment floorspace. Intensification

#### Design and Appearance

- 9.25 In terms of design, Core Strategy Policy 30 requires all developments to be high quality and design led, having special regard to their context while Policy DMD 37 seeks to achieve high quality design and requires development to be suitably designed for its intended function that is appropriate to its context and surroundings. The policy also notes that development should capitalise on opportunities to improve an area and sets out urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability, and diversity.
- 9.26 In terms of business premises making efficient use of land and maximising their contribution to the urban environment, Policy DMD 39 outlines a list of design criteria which proposals for business premises should seek to adhere to, including the requirement to positively address the public realm; clearly differentiate between public and private areas; provide inclusive access arrangements; sensitively screen and locate servicing, parking and refuse (to the rear where possible), mitigate potential negative impacts in surrounding uses; ensure massing and facades are visually interesting; respect the character of the surrounding area; and use high quality materials that can create, enhance or preserve the local character and identity.
- 9.27 Located within an industrial estate, part of the site has already been redeveloped. This application would complete the redevelopment of the entire site. The site is easily identifiable as being part of the industrial character of this part of Edmonton and a design code has been submitted with this application. A condition is proposed to require the development to be carried out in accordance with the approved design code as it is important to make sure that the appearance of the proposed development is of the highest quality to maintain an acceptable relationship with the surrounding area.

#### Layout

- 9.28 The illustrative masterplan locates the active fronts and entrances of the industrial buildings (mainly the office entrances) on the street frontages and uses the building to form the boundary of the site which avoids the excessive reliance on fencing and hard boundary treatments. This helps to promote an environment where functions and entrances are clearly visible from the public highway. Whilst there are several areas where this has not been achieved due to practical constraints, the scheme creates a good balance between legibility, activation, and practicality.

*Enfield Design Review Panel*

- 9.29 An online design review was held on 10<sup>th</sup> September 2020. Key responses were:

*i) "Fundamentally the proposals lack ambition and do not present a vision for the site that provides an optimised amount of new industrial workspace and a sustainable place for people to work."*

*ii) "The scheme presents a standard response more typical of a greenfield out of town development which is not appropriate for this complex urban site."*

The applicant has responded to this by working to integrate the proposals with the context using active frontages, landscape and place branding. It now goes beyond the generic approach expressed in 2020. Revising the layout and density of the scheme to reflect a more urban form that is less informed in its design by the needs of the car. Opportunities for intensification have been taken including multi storey use which is more appropriate for an urban use and an example of best practice.

*iii) Connections are not provided to the new active travel route along Angel Gardens and to Daniel Close. These routes should be provided to promote active travel and integrate the scheme with the surrounding area.*

Connections to Angel Walk and Daniel Close have now been included in the proposed parameter plans and illustrative scheme.

*Height, Bulk and Massing*

- 9.30 The heights of the proposed industrial buildings are informed by the surrounding context of the site with the parameter plans allowing buildings up to 28 metres in height. To the west, 2.5 storey terraced housing and to the East is the mainline railway across which is the Ely Industrial Estate. The height strategy proposes building up from the West towards the Railway rising from a maximum height of 12m to 19m at the railway. A zone allowing a maximum height of 28m is allocated in the centre of the site to allow for a multi storey B8 use building which would allow significant intensification of the site without a substantial visual impact on the surrounding areas. It should also be noted that the heights will drop down towards the residents to protect levels of amenity.

Appearance

9.31 The proposed buildings are designed to be functional business and industrial units and provide a modern and high-quality commercial development. All building elevations are largely composed metal composite cladding with two varying sheet profiles in two contrasting colours which are arranged to help break-down the building mass. In particular and to sympathetically address the scale and appearance of the traditional Victorian houses on Montagu Road , the Applicants have further revised the industrial units fronting Montagu Road has been designed to break down the building mass using lighter grey cladding to define the upper part of the elevation which drops down to ground level and then co-ordinate with the rear fire escape doors. High level windows are designed at the building corners and areas where the grey cladding extends to the ground.

9.32 Discussions have focused on the materiality of the outline phases and creating a unique, industrial character with buildings that are clearly differentiated and assist with wayfinding. The design code sets out guidance on attractive but practical materials and strategies to address this. Materials for the Full application have been outlined in plans as below:

- Walls: Composite metal sheet cladding system in light and dark grey.
- Roof: Proprietary profile metal sheet roofing system in grey.
- Fascia's and guttering: PPC aluminium. Colour grey.
- Windows: Aluminium framed double-glazed ribbon/casement windows. Frame colour black. Window infill panels colour dark grey.
- Entrance Canopy: PPC aluminium entrance canopy feature. Colour grey
- Doors: Main entrance doors - aluminium framed doubled glazed doors with side lights - frame Colour black.
- External Security/ Warehouse Doors: Painted steel security doors to fire exits. Frames and doors, colour dark grey/black.
- Roller Shutter Doors: Insulated colour coated metal. Colour grey/black.
- Site Security fencing:2.4m high metal mesh paladin fence with polyester powder coated finish. Colour black.

*Barrier Free/Accessibility*

9.33 The design includes allocated disabled parking for people with disabilities which would be located close to the entrance of each unit. The approach to the entrance from the disabled parking bay would be level with dropped kerbs where necessary.

9.34 The entrance doors would have a level threshold. Doors and other glazing at ground floor would be provided with manifestation as appropriate and in accordance with the Building Regulations. Entrance doors would have a minimum clear opening of 800mm with all door hardware specified in accordance with the Building Regulations. Stairs are designed to be suitable

for ambulant disabled use in accordance with the Building regulations Part M. A disabled refuge zone would be provided within the protected, first floor lobby area of units with first floor offices. A designated space would be allocated for a platform lift if required by an occupier in each unit with a first-floor office.

- 9.35 A unisex, fully accessible W.C would be provided at ground level which would be sized accordingly for the provision of an accessible shower to be fitted if required by the occupier.

#### *Summary of Design and Appearance*

- 9.36 The proposed development is industrial in scale, design and language. Whilst some of the buildings would be adjacent to a residential area, conservation area and park land, they nonetheless would retain their industrial identity. The developers have taken the comments made by the Council prior to submission into account and designed a development which would integrate with its surroundings. Subject to subsequent reserved matters applications to follow, overall the indicative plans submitted with this application are considered to be a well-designed development that would significantly improve the appearance of this important industrial estate and set the standard for this wider redevelopment, which will raise the profile of the site.
- 9.37 Given the above the proposal is considered acceptable in terms of design and appearance terms.

#### Heritage

- 9.38 There are no designated or non-designated assets within the application site Montagu Road Cemeteries, Conservation Area is, however, in close proximity and the introduction of well-designed modern buildings would certainly enhance the setting of the wider area. It is therefore considered having regard to the tests in the NPPF, that the development would cause no harm to the setting of the nearby Conservation Area,

#### Amenity

- 9.39 London Plan policy states that buildings should not cause unacceptable harm to residential amenity, including privacy and overshadowing. Policies DMD 6 and 8 ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment and the principles contained in this policy have been applied in this case given the relationship to residential properties. Furthermore, Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity.
- 9.40 The site is located within a well-established industrial area and has co-existed with residential properties for decades and as such would not be harmful to the amenities of nearby residential plots. The layout of the buildings to the west of the site minimises the amount of yard space facing rear gardens and uses the mass of the proposed buildings to reduce the impact of noise and sights of industrial uses on the rear gardens.

#### *Servicing*

- 9.41 There are currently no restrictions on the operating hours of the site, and this is expected to remain the case if permission is granted, that is, the units would operate on a 24-hour basis 7-days a week.
- 9.42 As there are currently no end users for the units, it is not possible to confirm the frequency or hours for commercial activity including deliveries. However, this situation is no different from that which could lawfully exist and operate from this site in the future. Any unacceptable future noise nuisance is a matter that can be addressed under separate legislation.

*Overlooking / Privacy*

- 9.43 The closest residential properties are to the west of the site and as mentioned above these properties and the site have co-existed for a number of years with buildings on the site. The proposed buildings would face the rear gardens of residential properties (Nos 146 to 226 Montagu Road and Nos 1 to 14 Daniel Close) and the layout has been informed by a Daylight / Sunlight Assessment. It is however considered that the proposed new units would not cause any amenity harm over and above what is currently being experienced. There are also buildings associated with the cemetery on the west side of Montagu Road, which do not hold the weight when assessing privacy impacts.
- 9.44 Taking into account that there have been industrial buildings on the site before, the distance between the proposed buildings and residential properties and design of the proposed buildings, it is considered there would not be any undue adverse impact arising to neighbouring occupiers in terms of overlooking and loss of privacy.

*Light Pollution*

- 9.45 No details of external lighting have been provided and it is recommended that details are submitted via condition as part of reserved matters. Notwithstanding this, it is considered that based on the indicative plans submitted, the design of the buildings being proportionally more cladding than glazing, the relationship with the few residential units, there are no perceived concerns in terms of light pollution. The condition will cover the impact of exterior lighting for the yards to avoid impacting on the residential homes to the west.

*Noise*

- 9.46 Potential noise impacts associated with the proposed uses are a material consideration. London Plan policies aims to reduce noise and enhance soundscapes. DMD 68 states that developments that generate or would be exposed to an unacceptable level of noise will not be permitted. It states that developments must be sensitively designed, managed and operated to reduce exposure to noise and noise generation. Environmental Health officers consider that while the development would involve a waste site and Industrial uses with appropriate modern windows and doors this should not be harmful to residential amenity. However, piling during construction could have an impact on neighbouring amenity and as such this should be conditioned to minimise the potential impact. The proposed buildings would be built to current specifications to reduce noise leakage.



- 9.47 The acoustic report highlights that noise from night-time operations would be 2dB above the typical background noise level. Although BS4142 considers this to be a low impact the Council requires that noise from developments is 5dB below the typical background noise level. If the units are to be used at night the developer must submit noise control proposals in their acoustic report to ensure the criteria of 5dB below the typical background noise level is met. To ensure compliance with noise limits, it is recommended that an appropriate condition be attached if approved.

*Contaminated Land*

- 9.48 Accompanying the application is a contaminated land report which recommends a site investigation report. There is no objection to its conclusions but in accordance with standard practice, a condition is attached to further review the investigation and assessment of the extent of contamination and require details of any mitigation measures necessary to avoid risk to health and the environment

*Fire Safety*

- 9.49 The London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage: "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..." Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users. Just as per the approved phase one application, this current application is supported by a Fire Strategy, as required by London Plan Policy D12. The Council's Building Control Officer has reviewed the strategy and confirms it provides sufficient detail re fire safety to show compliance will be achieved and that access for the fire service can be provided to the required standard.

*Air Quality / Dust*

- 9.50 An updated air quality assessment adequately addresses the queries from stage 1 of the GLA referral and the GLA has confirmed that no further information is required and the development is considered to comply with London Plan air quality policies. The whole of London is a low emissions zone for non-road mobile machinery. It is for this reason Environmental Protection has recommended that a condition be attached to ensure compliance the GLA's supplementary planning guidance: 'Control of Dust and Emissions During Construction and Demolition'

*Summary*

- 9.51 In light of the above the proposal is considered acceptable in terms of residential amenity impact subject to the attachment of conditions as stated.

Highways

9.52 DMD 45 relates to car parking, cycle provision and parking design. DMD 47 states that new development proposals will need to demonstrate that enough space for servicing, circulation and access to, from and through the site is provided. All developments must be fully accessible to pedestrians and cyclists and assist with general permeability within an area and the current factory does not provide this. London Plan, DMD policy 45 (Parking Standards and Layout) and 47 (Access, New Roads and Servicing) states that operational parking for maintenance, servicing and deliveries is required to enable a development to function.

9.53 The Public Transport Accessibility Level (PTAL) of the site is 1b which is poor.

*Access / Egress*

9.54 Vehicular access would be from the access points on Princes Road and Pegamoid Road. However, there will be some reconfiguration of the junctions and accesses. This however is likely to form part of a Section 278, however it is not clear if this will be part of a larger Section 278 and possibly a Section 38, as the whole site is going to be redeveloped. This however would not stop an issue being issued on the site, given that a Section 278 falls outside the remit of the planning regulations and falls under the Highways Act. The parameter plans secure the provision of 1no. cycle and walking access point to Angel wall, allowing creation of a sustainable route through the site connected to the wider active travel network and new park. In addition, the existing pedestrian only access at Daniel Close is retained and improved.

*Vehicle Parking Provision*

9.55 The Highways Team has been consulted and have commented that overall the parking provision is below the maximum standard by 113 spaces, should the Outer London standards be applied. Should the Outer London OA standard be applied, the provision will exceed the minimum by 210 spaces. As mentioned above, the decision taken in the pre-app discussions was to assess the proposal based on the Outer London standards as opposed to the Outer London OA. Given the sites context.

9.56 On this basis, the parking provision is acceptable and is consistent with the approach to the approved Phase 1. It is also noted that the high number of units will mean an associated higher overall provision of office space, which will have a higher employment density than the industrial/warehouse uses (notwithstanding the London Plan parking standards for both uses are the same).

9.57 20% of the spaces will be electric charging, with the remainder being passive charging. This meets London Plan standards.

9.58 It is noted that there is scope to promote the accessibility of the site by sustainable transport modes, which will be secured by both the Travel Plan and a legal agreement to deliver improvements to local infrastructure.

9.59 There was a concern raised in the pre-app discussions that parking provision for the existing site could be insufficient, and that overspill parking occurring might cause issues with access and circulation within the industrial estate roads.

#### *Vehicle Parking Layout*

- 9.60 Layout of parking bays meet the minimum 2.40m x 4.80m and allow vehicles to access / egress units in a forward gear. In addition, HGV loading bays / delivery bays are accommodated on site where required, and tracking has been included to confirm vehicles can access and turn within the service yards.

#### *Vehicular Access*

- 9.61 The access to the sites will be from new internal access roads. The proposed road layout will likely require a Stopping Up Order, and potentially an adoption agreement under Section 38. To confirm, all roads within the Site will be designed to an adoptable standard, with future adoption likely at a later date..

#### *Pedestrian Access*

- 9.62 Pedestrian footways are shown throughout the site in the illustrative scheme, measuring 2m wide and meeting design standards included in the Manual for Streets. It is noted some sections only have footway on one side, which creates issues in terms of desire lines and flexibility of pedestrian movement meaning the illustrative scheme is not acceptable. Some of the sites have excessively wide crossovers/gaps in the footway. This can be improved with an approach to the surfacing / treatments, to make it clear that pedestrian access is prioritised, this has been conditioned. These issues will be resolved in the reserved matters applications.
- 9.63 The treatment of the proposed new pedestrian access points from Daniel Close and Angel Walk are not shown in detail, however they are referenced in the TA. This is welcome and detail can be secured with condition. The blocking up of Second Ave would form part of the reserved matters and not part of this application. The status of Second Avenue will remain as is.

#### *Traffic Generation*

- 9.64 The application includes the TRICS estimates for trip generation based on the proposed floorspace. Traffic predictions are informed by the TRICS database and from existing surveys from within the site.
- 9.65 It should be noted that traffic along Montagu Road is heavy in peak times especially HGVs. At this stage modelling of the junctions cannot be ruled out but further observations from T&T are required. The flows on Montagu have been investigated as part of other projects (Cycle Enfield) and there could be scope to improve the access points (Pegamoid Road and Princes Road).

#### *Servicing*

- 9.66 All the sites can be serviced on site without any impact on highway network

#### *Cycle Parking*

- 9.67 Cycle has been shown and this is based on 1xspace / 500sqm for short stay, and 1xspace / 1000sqm for long stay. The proposal includes space for 80 x spaces long stay and 40 x spaces short stay, which meets the requirements. The detail will need to be secured through planning condition.

- 9.68 The TA includes reference to a proposed cycle lane running through the site. This is shown as an access from Angel Walk and is welcomed as providing access from the new proposed cycle facilities on Angel Walk, particularly for employees. However, there is a concern the access will be used as a link through the site, which may not be suitable for cyclists due to the HGV volumes.

*Travel Plan*

- 9.69 There will be a requirement for Section 111 Legal Agreement to mitigate and improve access to the site, primarily by improving pedestrian and cycle accesses and the routes which will bring employees to the site, as identified in the Active Travel Zone. To be secured in the legal agreement at £3,000.

*Stopping up Order*

- 9.70 A stopping up order will also be required for the areas shown in the transport assessment. This would be coordinated by the Council; however, the applicant is advised to submit as early as possible (see informative). Bearing in mind the overall redevelopment plans, this would need to be coordinated within the whole site.

Sustainable Transport Improvements

- 9.71 If approved, the Council would seek to secure financial contributions to sustainable transport improvements, in line with similar scale developments in the area. The Initial figure quoted by Transportation is £80,765.00.

*Section 278*

- 9.72 A Section 278 for the highway areas to be improved will also be required.

*Summary*

- 9.73 The above assessment demonstrates that the proposal would not result in an unacceptable impact in terms of traffic and transportation matters, and furthermore is not expected to result in any significant additional impact over and above the existing. As such, subject to a legal agreement for sustainable transport improvements and a travel plan, a S278 for alterations to the access, a stopping up order and conditions requiring a Construction Traffic Management Plan the proposal is considered acceptable in terms of traffic and transportation.

Refuse, Waste and Recycling

- 9.74 The London Plan requires suitable waste and recycling storage facilities in all new developments whilst Core Policy 22 supports the provision of a sufficient, well-located waste management facility and requires all new developments to provide on-site waste treatment, storage and collection throughout the lifetime of the development. Meanwhile Policy DMD 57 notes that all new developments should make provision for waste storage, sorting and recycling, and adequate access for waste collection.
- 9.75 External refuse and recycling areas are shown to the front of the proposed buildings within the car parking areas. A waste strategy needs to be provided,

which can be conditioned. Given the above the application is considered acceptable in terms of refuse, waste and recycling.

#### Sustainable Drainage / Flood Risk

- 9.76 London Plan policies require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 (“Managing flood risk through development”) confirms the Council’s approach to flood risk, inclusive of the requirement for SuDS in all developments. Policy DMD59 (“Avoiding and reducing flood risk”) confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere and that planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in unacceptable levels of flood risk on site or increase the level of flood risk to third parties.
- 9.77 DMD61 (“Managing surface water”) requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.
- 9.78 The SuDS Strategy should aim to remove as much catchment area as possible from the northern surface water pumping station. This pump outfalls directly to the Salmons Brook River and contributes significantly to flood risk downstream. The intention is for most of the catchment areas to drain via gravity to the GNER Ditch to the south via above ground attenuation features. Each plot will be expected to provide greenfield runoff rates and extensive source control SuDS features in line with DMD Policy 61.
- 9.79 The application has been negotiated during the course of the assessment to ensure that it meets necessary Council requirements and in principle there is no objection but further details on FFLs, flood compensation and overland flow routes will need to be provided per phase, Conditions will secure this detail and it is recommended that all the shared access roads and pond areas that are integral parts of the overland flow route and flood strategy are developed as one phase in the future.
- 9.80 In respect of flooding, consultation was undertaken with the Environment Agency. The Environment Agency did not object to the proposal.

#### Sustainability

- 9.81 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, and policies relevant to sustainability are set out throughout the NPPF. Further planning policies relevant to sustainability are set out in chapter 5 of the London Plan, which states that development proposals should make the fullest contribution to minimising carbon dioxide (CO<sub>2</sub>) emissions in accordance with the following energy hierarchy:
- Be Lean: use less energy;
  - Be Clean: supply energy efficiency; and
  - Be Green: use renewable energy.
- 9.82 DMD policy 49 requires the highest sustainable design and construction standards, having regard to technical feasibility and economic viability. These

policies require 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 (Core Strategy Policy 20 and DMD51), seeking zero carbon developments (DMD50), using decentralised networks where feasible (DMD52), and providing on-site renewable energy generation to make-up any shortfall where feasible (DMD53).

#### Decentralised Energy Network

- 9.83 Montagu Industrial Estate is proposed for connection to the district energy network in 2023 which would reduce NOx level emissions due to heat and hot water at the development to zero and reduce carbon emissions by over 70%. Energetik would be the provider across the site.
- 9.84 With connection only possible in few years, there are interim measures that can be put in place. These include a clear District Energy Network service zone from a central primary plant location to each unit. The clear services zone shall have no obstructions that would restrict the excavation of the trench to enable the DEN services to be installed at a future date. The DEN service zone shall be utilised for the installation of network insulation heating pipes as and when units request a DEN connection. The DEN services zone shall be 850mm (W) x 850mm (D). and shall be clearly highlighted on all construction drawings. A connection to the DEN shall be considered if a warehouse instantaneous heat demand exceeds 150kW.
- 9.85 Policy DMD Policy 50 requires non-residential development to be BREEAM 'Excellent' rating. The applicant has submitted an Energy and Sustainability Statement stating the building fabric of the proposal would, as a minimum, have a BREEAM 'Very Good' rating. Since the adoption of Policy DMD 50, the requirements of BREEAM have changed.
- 9.86 Achieving BREEAM Excellent for industrial developments is difficult, especially for shell only speculative developments and industrial sites do not naturally score high in the Transport and Ecology sections. Having regard to the future connectivity to the decentralised energy network and energy reducing measures outlined below, it is considered that overall the proposal would make a positive contribution towards reducing climate change by achieving a Very Good rating with aspirations for Excellent.

Other active energy efficiency features include:

- Thermal and acoustic efficient glazing
- Cladding materials incorporated that provide an attractive finish but that are durable with good longevity.
- Good building thermal performance and low air permeability.
- Energy efficient lighting, with external passive infrared (PIR) sensors, automatic time switch controls and daylight sensors.
- Energy efficient air source heat pump heating and cooling systems to all office spaces.

- The development shall provide 10% of the regulated energy consumption via renewable technologies.

9.87 Subject to the above measures being incorporated into the development and the viability of becoming connected to a Decentralised Energy Network being fully explored as required by the legal agreement, the proposal is considered acceptable in terms of sustainability and energy matters.

#### Trees

9.88 The site contains a number of mature trees which are of great amenity value. The Council's tree officers have commented that the development proposal indicates the removal of B category trees (identified as G12) located on the eastern boundary of the Waste Management area, beyond which exists a designated wildlife corridor. These trees are of clear benefit to the biodiversity and habitat value of the wildlife corridor. Section 3.6 of Arboricultural Impact Assessment (AIA) report reference 9058.001 suggests the trees' removal would be necessary to facilitate the installation of hard standing. However, following ongoing discussions with the Council's Tree Officer, the Applicant has agreed to further explore whether the loss of any existing trees is required.

The GLA has also suggested that the AIA be updated, requiring that all applications to provide an assessment of the value of the trees to be lost prior to determination or be secured by condition. In this instance, the Applicant has agreed to a planning condition which would require the submission of a more detailed Arboricultural Assessment (pre-commencement).

For phases whereby the removal of trees is proposed, the Applicant has agreed to submit a schedule of trees to be removed or retained, justification for loss of trees, and details of replacement tree planting where necessary.

#### Outline Phase:

9.89 Due to the outline nature for part of the hybrid application, a detailed report that quantifies / evaluates the development in relation to trees has yet to be produced. No definitive comments can therefore be made at present. In discussion with the Applicant, it is the intention that all trees will be retained but a condition is proposed whereby at each reserved matters application, details will be provided on the development's relationships with trees and any necessary removal and replacement planting

#### Biodiversity

9.90 Through Policy 36 of the Core Strategy the Council commits to 'protect, enhance, restore or add to biodiversity interests within the Borough'. This is reaffirmed in the DMD policies 78 to 81.

9.91 The National Planning Policy Framework (NPPF) recognises that the planning system should aim to conserve and enhance the natural and local environment

by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including the establishing of coherent ecological networks that are more resilient to current and future pressures. Paragraph 175 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should therefore be encouraged.

- 9.92 An ecological survey accompanied the application with the purpose of identifying any habitats and species present or potentially present and evaluate their importance, assess the impact of the development proposal and describe any measures necessary to avoid impacts, reduce impacts or compensate for impacts so that there is no net harm to ecological features.
- 9.93 Ornamental planting is proposed within the landscaping and this should be structurally diverse and include species of known value to wildlife including berrying, flowering and fruiting species.
- 9.94 It is considered there would be a biodiversity enhancement as part of an overall landscaping scheme which is to be conditioned.

#### Secure by Design

- 9.95 Following consultation with the Metropolitan Police Service (MPS) Designing out Crime team concerns were raised in respect of safety and security. Various recommendations have been made by MPS which have passed on to the applicant and it has been agreed, these measures will be covered by condition to ensure the development achieves a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards.

#### Business, Employment and Skills

- 9.96 The Council is committed to maximising the number and variety of jobs and apprenticeships available to residents of the borough and maintaining and encouraging the widest possible range of economic activity, including the availability of a skilled labour force. To this end, the Council will seek agreement with developers to secure appropriate planning obligations for employment and training initiatives as part of development proposals.
- 9.97 Policy E11 Skills and opportunities for all of the London Plan seeks to provide local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners, which mirrors the Council's aspirations.
- 9.98 The proposal falls within the criteria for developer contributions towards business, employment and skills as it would result in floorspace greater than 1000 square metres. In accordance with LB Enfield's Section 106 Supplementary Planning Guidance (SPG) (2016) therefore, the Applicant has agreed to a Section 106 obligation relating to securing local employment, delivering apprenticeships and training opportunities, and utilising local businesses in the supply chain.
- 9.99 The proposed development will result in an uplift of employment floorspace, and thus an uplift in employment opportunities for local people. As discussed,



within the accompanying Economic Benefits Statement, the proposed development could support between 695 and 1,000 FTE jobs, depending upon the final breakdown of floorspace.

9.100 In accordance with London Plan policy E3 which encourages proposals involving the creation of employment floorspace to include affordable workspace, the applicant will explore opportunities to deliver affordable units, as well as units of different sizes, in accordance with local need. Information regarding the amount and type of affordable workspace to be delivered, will be provided alongside future Reserved Matters Applications.

## 10. **Planning Obligations**

10.1 The necessary Heads of Terms are:

- Financial contribution of £80,765.00 for sustainable transport. Based on net increase floorspace 17908sqm (figures from planning statement. Paid upon commencement)
- Highways - Travel Plan- £3,000, Structure should be the same as previous application
- Employment and skills strategy in accordance with S106 SPD; Extend as per previous application. Uplift in numbers
- Decentralised Energy Network viability information to be submitted; - Rollover
- Monitoring fee contribution £11,000
- S278 and S38 for adoption if required
- Relocation of Church – Re-provided before demolition
- Waste Site – Re-provision before demotion of existing facility to ensure continuity but depends on phasing.

## 11. **CIL**

11.1 This would be calculated in accordance with the Mayor's adopted Community Infrastructure Levy Charging Schedule 2012 and Enfield's adopted Community Infrastructure Levy Charging Schedule 2016. The payments would be chargeable on implementation of the commercial development.

## 12. **Public Sector Equality Duty**

12.1 Article 149 of the Equality Act 2010 provides:

(1) A public authority must, in the exercise of its functions, have due regard to the need to

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristics and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to –

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

- 12.2 The Public Sector Equality Duty means the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions including decision making on planning applications. These considerations include: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 12.3 The key elements of the Proposed Development which have an impact that could result in an equalities effect including the relocation of the church and displacement of other businesses, design and physical characteristics of the proposals subject of the planning application.
- 12.4 Officers consider that the relocation or closure of the community facilities can adversely affect people who rely on these services to maintain their social networks. Any change in these services could result in social isolation and breakdown of social relationships potentially disproportionately affecting older people, minority ethnic groups (and particular people from religious faith communities), and disabled people.
- 12.5 Minority ethnic people (Black African and other White population and minority religious groups (particularly Muslims and non-religious groups are disproportionately represented in the local population and are likely to use the community resources. They are therefore likely to be adversely impacted due to relocation or potential extinguishment of the community facilities.
- 12.6 In conclusion Officers consider that the proposal to grant planning permission for this development would as the Inclusive Design Statement identifies will deliver proportionate mitigation measures that will be effectively and largely managed through a range of continuing planning obligations and measures covered within the body of this report. These planning obligations will reduce

the likelihood of adverse equality impacts arising and effectively manage any potential and perceived impacts for the disadvantaged protected groups. .

- 12.7 Accordingly, the recommendation is considered appropriate in upholding the council's adopted and emerging policies and is not outweighed by any engaged rights.

### **13. Conclusion**

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

- 13.2 The redevelopment of the site would provide much needed high-quality business units and a replacement waste site at this locus and would act as a follow up for the planned redevelopment of the whole industrial estate. Redevelopment of the site would provide employment opportunities both during the construction phase and completion. Significantly, employment for residents of the borough can be secured via the Council's supplementary planning document. This is also consistent with a number of Council corporate priorities and the prevailing Development Plan policies in the London Plan and Core Strategy and is a key material planning consideration to be weighed up as part of the assessment of the application.

- 13.3 The proposal is considered acceptable in terms of land use, which is already established, and is also considered acceptable in terms of design, neighbour amenity impact, transport impact, proposed sustainability and energy reduction measures. This is subject to conditions and an appropriate Section 106 agreement, the draft Heads of Terms of which have been agreed with the applicant.

- 13.4 This report shows that the benefits of the proposed development have been given due consideration and are sufficient enough to outweigh any perceived harm. In this respect the benefits are summarised again as follows:

- The proposed land use is within an already established industrial area and the application has demonstrated that the proposed development can provide adequate compensatory waste capacity.
- Contribute toward the regeneration of this priority area;
- The development would contribute to employment opportunities with opportunities for local residents secured;
- The development improves the appearance of the existing site and is considered appropriate in terms of its appearance, size, siting, scale and design;
- The development provides sufficient car and cycle parking spaces.
- The development is acceptable in terms of impact on neighbouring occupiers and the new building incorporates noise reduction measures and as such will be a better neighbour than the existing in terms of noise;

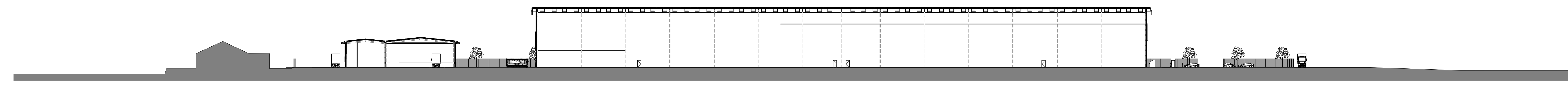
- The periphery of the site would be visually improved with landscaping which would also enhance biodiversity;
- In the interests of sustainable transport, a Travel Plan would be secured by a legal agreement;
- The proposed building would comply with the ethos of sustainable development, including connection to a decentralised network.

13.5 Having regard also to the mitigation secured by the recommended conditions and legal agreement, it is considered the proposed development is acceptable when assessed against the suite of relevant planning policies. Members are being asked in considering the officer recommendation to grant planning permission to also grant delegated authority to officers to agree the final wording for these conditions and/or legal agreement Heads of Terms and to finalise the Design Code.

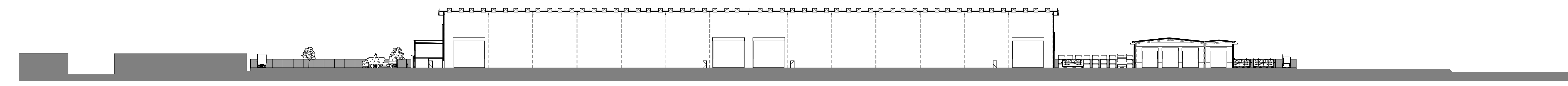


Section 2  
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Section 3  
 SCALE: 1 : 500



Section 1  
 SCALE: 1 : 500



Section 4  
 SCALE: 1 : 500

Project	19050201	10	10
Client	19050201	10	10
Rev.	1000	10	1000

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Project  
 NEW WASTE FACILITY MONTEGU  
 INDUSTRIAL ESTATE

Drawing  
 SITE SECTIONS

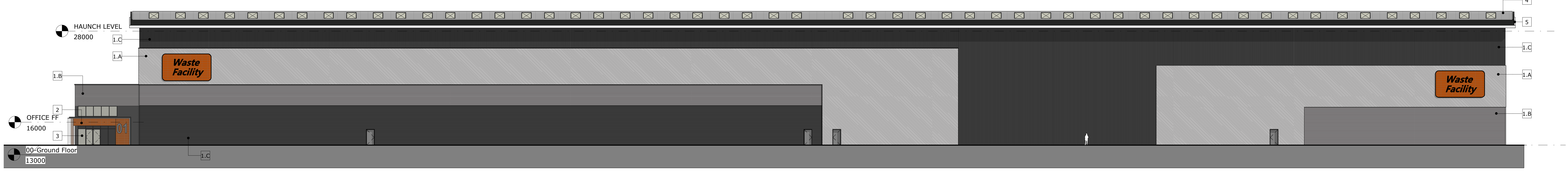
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Ref	1905-JSA-XX-XX-DR-A-04202	Rev.	P2		

19050201

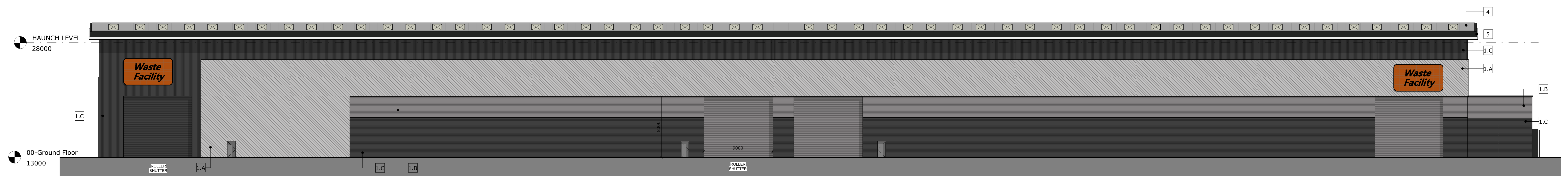


**MATERIAL LEGEND**

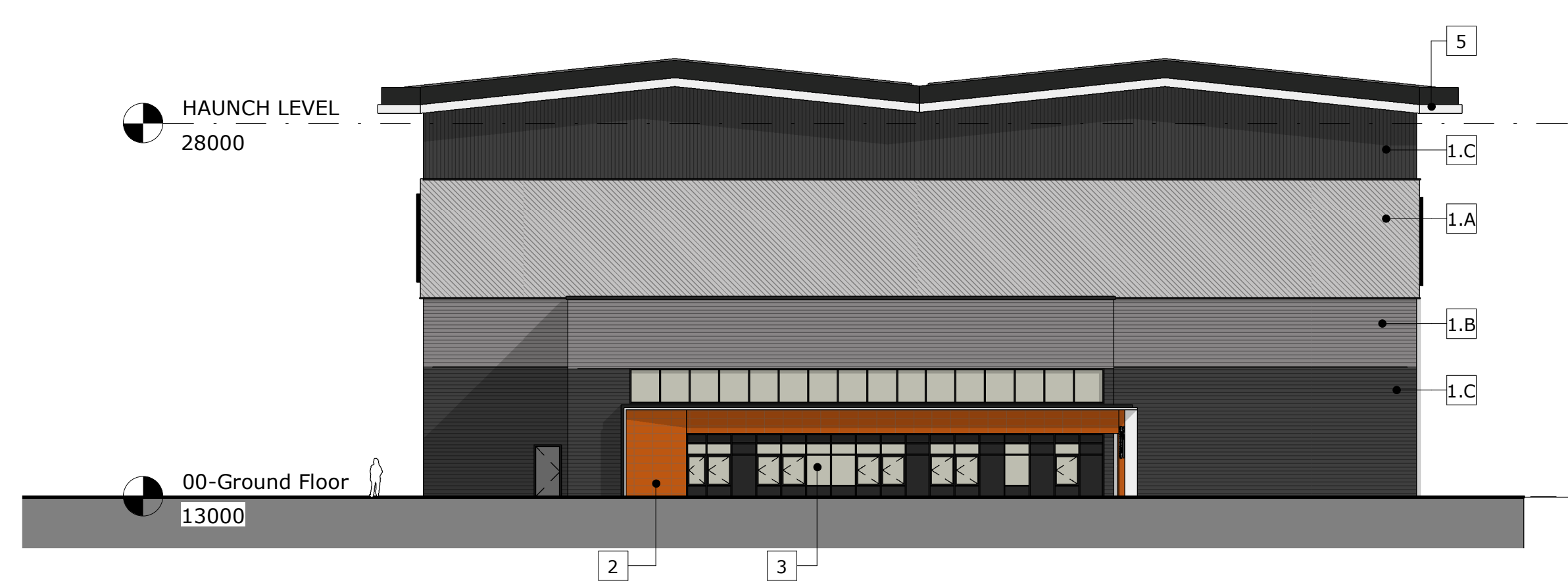
- 1.A BUILT-UP PROFILED METAL CLADDING PANEL SYSTEM, COLOUR: LIGHT GREY
- 1.B BUILT-UP PROFILED METAL CLADDING PANEL SYSTEM, COLOUR: MEDIUM GREY
- 1.C BUILT-UP PROFILED METAL CLADDING PANEL SYSTEM, COLOUR: DARK GREY
- 2 FEATURE COMPOSITE RAINSCREEN-CLADDING SYSTEM - COLOUR: ORANGE
- 3 ALUMINIUM FRAME GLAZING SYSTEM
- 4 BUILT-UP PROFILED METAL CLADDING ROOF SYSTEM
- 5 PFC ALUMINIUM PROFILE TO FASCIA AND CANOPY - COLOUR: WHITE/DARK GREY



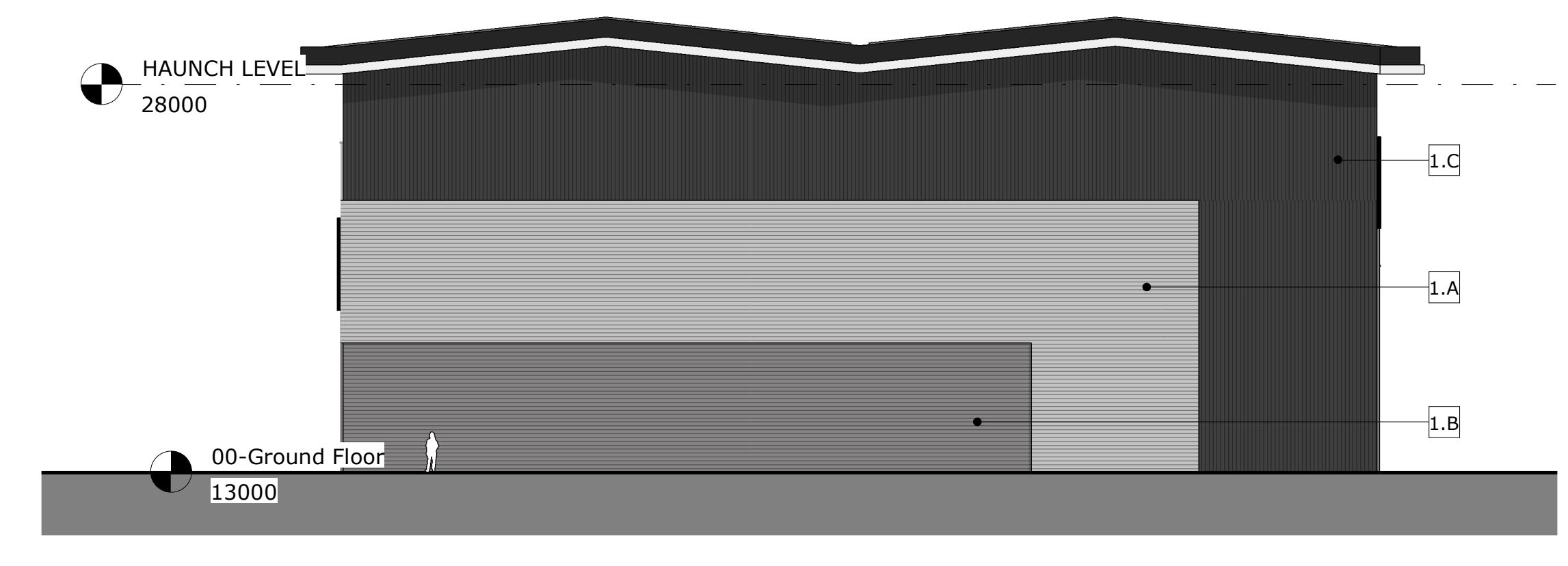
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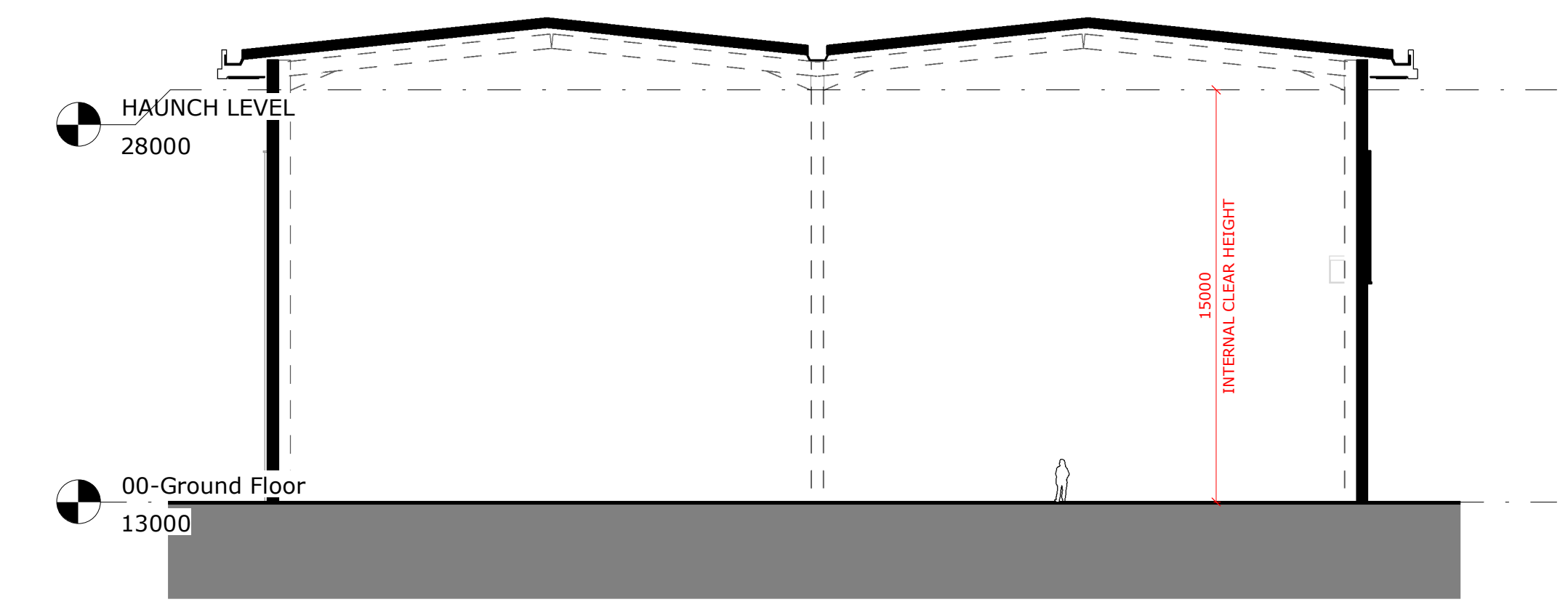
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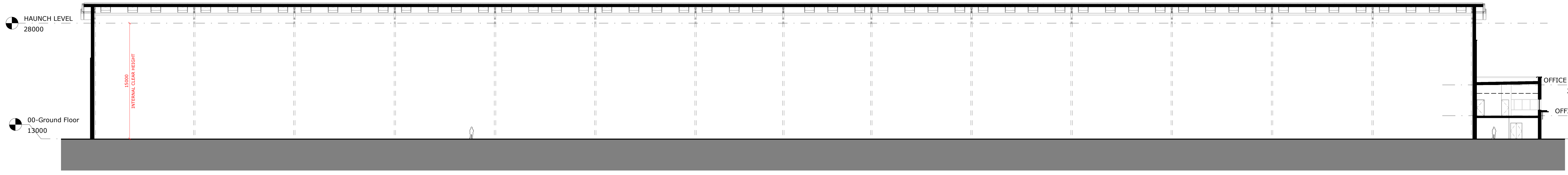
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SCALE: 1 : 200



SOUTH ELEVATION  
SCALE: 1 : 200



Section AA  
SCALE: 1 : 200



Section BB  
SCALE: 1 : 200

Rev	Description	Date	By	Chk
1	Issue for tender	11/02/21	CC	CC
2	Issue for design	11/02/21	CC	CC
3	Issue for construction	11/02/21	CC	CC

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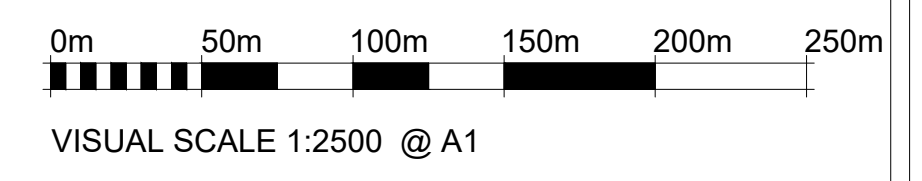
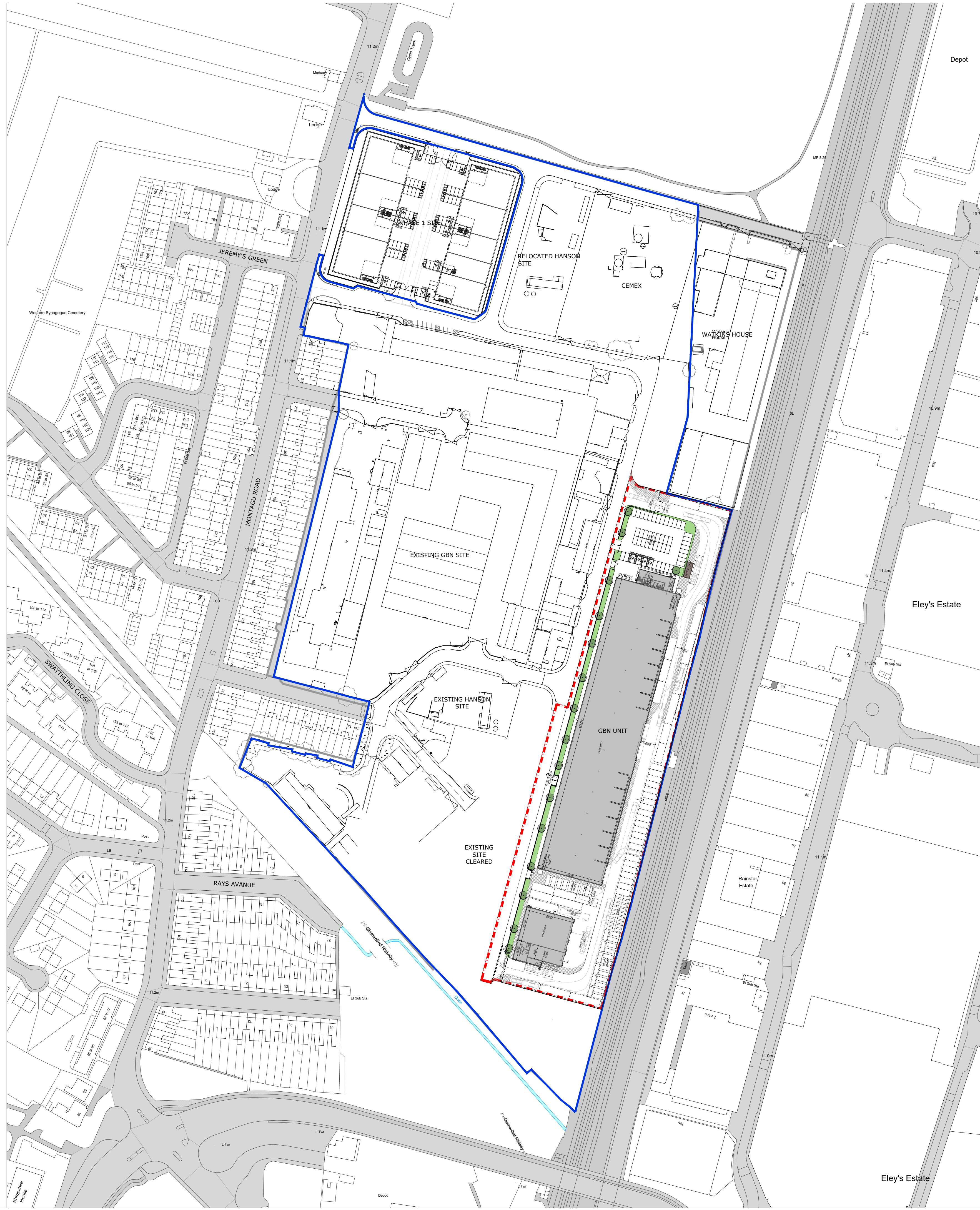


Project  
NEW WASTE FACILITY  
MONTEGU INDUSTRIAL ESTATE

Drawing  
MAIN UNIT GA ELEVATIONS AND SECTIONS

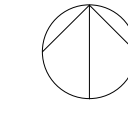
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Ref	Rev.	
1905-JSA-XX-DR-A-04201	P2	





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Notes



— TITLE BOUNDARY  
 - - - APPLICATION BOUNDARY

P5	Issued for Planning	15/12/21	CC	JD
P4	Red line boundary updated	08/12/21	JD	CC
P3	GBN Site Layout Updated	15/07/21	CC	JD
P2	GBN Site Layout Updated	05/07/21	CC	JD
P1	Initial Issue	30/04/21	CC	JD
Rev	Description	Date	By	Chk

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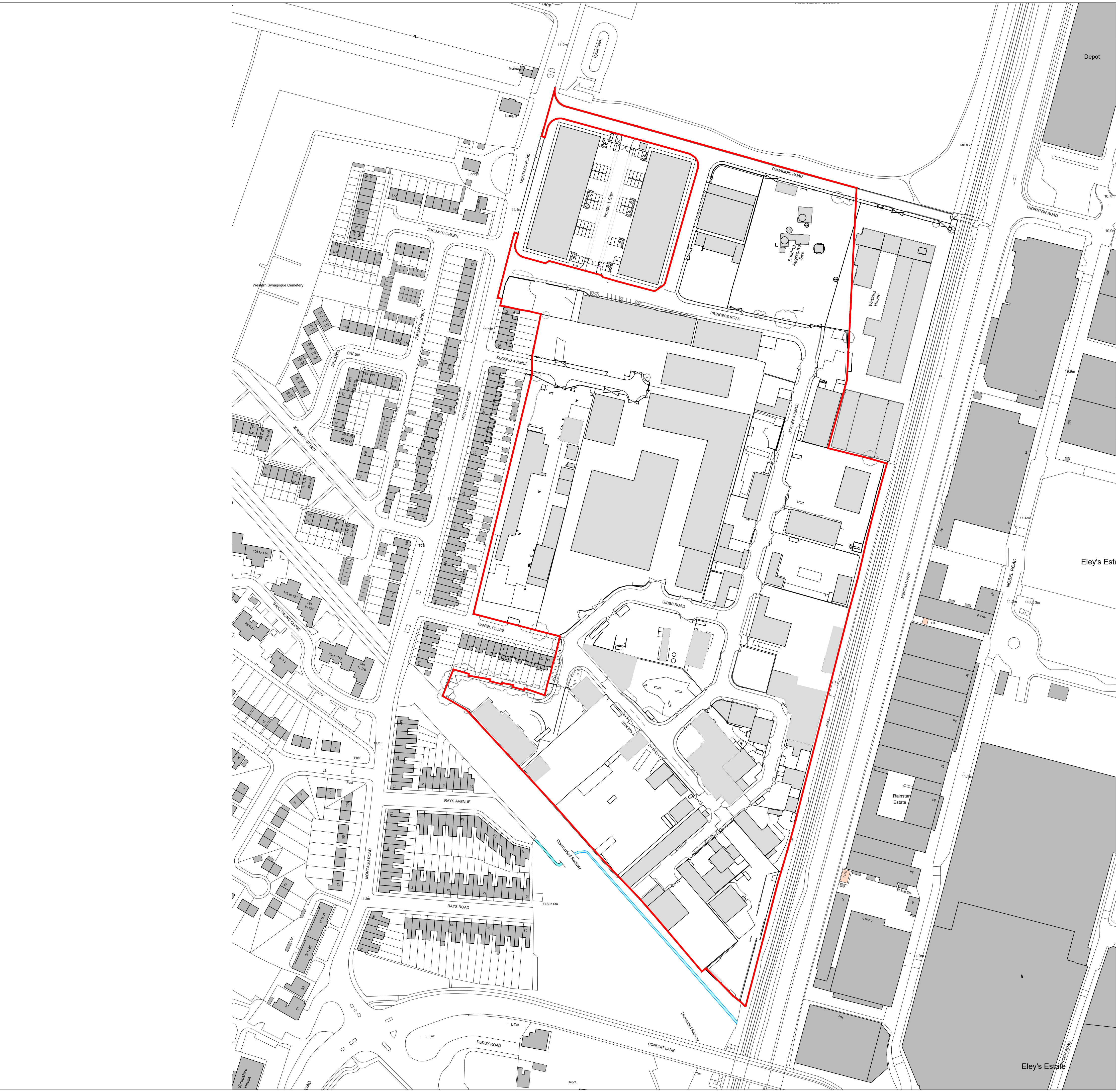


Project  
**NEW WASTE FACILITY  
 MONTAGU INDUSTRIAL ESTATE**

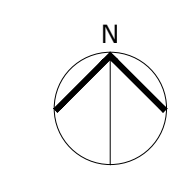
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**SITE LOCATION PLAN**

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Drawing Purpose	Status	
PLANNING SUBMISSION	S5	
Ref	Rev.	
JSA-1905-GB-00-DR-A-00001	P5	
Job No. Origin_Zone_Level_Type_Dis_Number		





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 VISUAL SCALE 1:1250 @ A1



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 Notes

Key	
<span style="color: red;">—</span>	Application Boundary
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Rev	Description	Date	By	Chk
P1	Planning Issue	21/12/21	CC	JD

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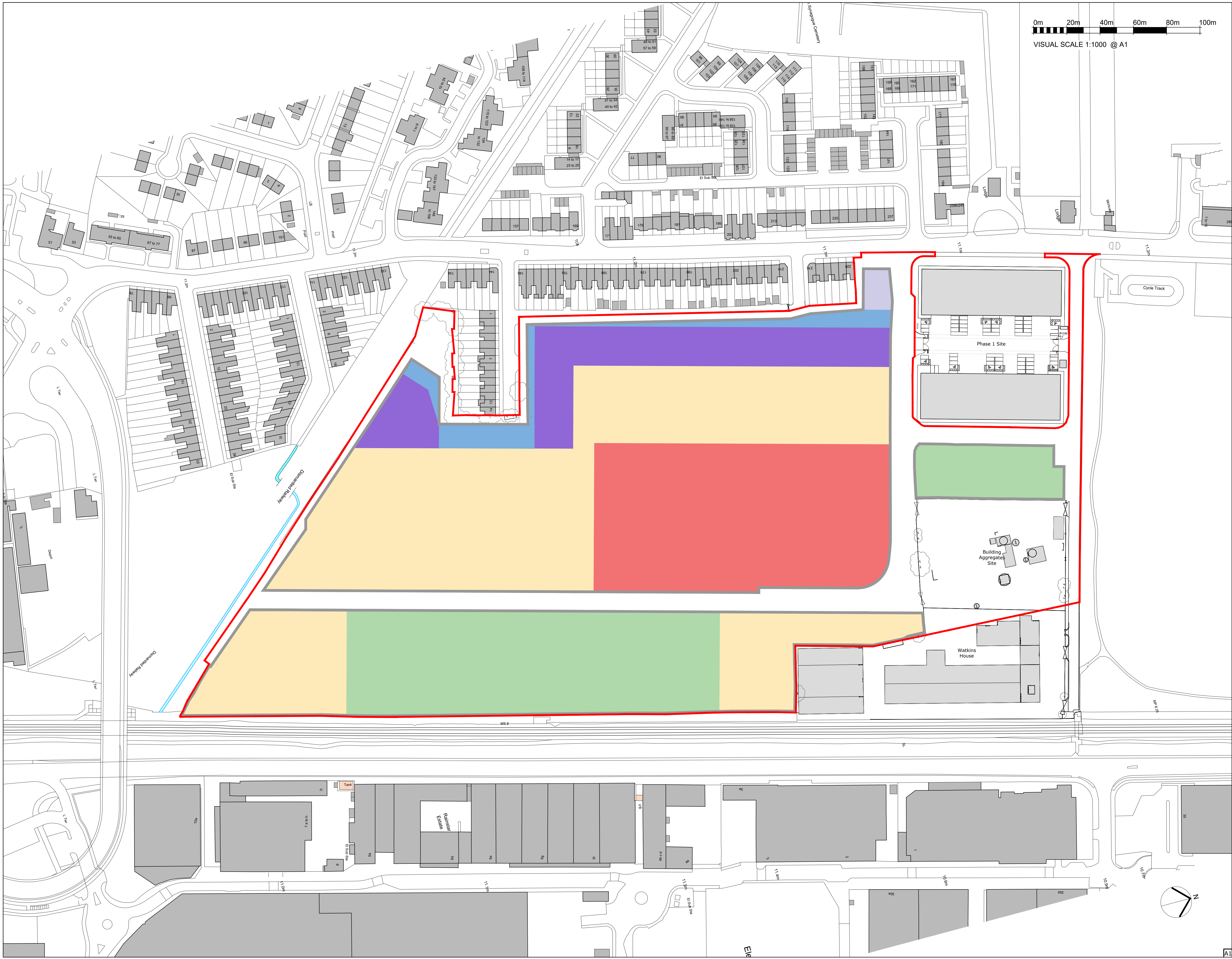


Project  
**Montagu Industrial Estate  
 Enfield**

Drawing  
**Site Location Plan**

Scale	Drawn	Date
1:1250@A1	JD	Dec 21
Drawing Purpose	Status	
PLANNING SUBMISSION	S5	
Ref	Rev.	
1103-JSA-XX-00-DR-A-01002	P1	
Job No.	Origin	Zone
	Level	Type
	Dis.	Number





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 Notes

**Key**

- Application Boundary
- Plot Boundary

**Maximum Building Heights**

- Up to 6 meters
- Up to 8 meters
- Up to 12 meters
- Up to 16 meters
- Up to 19 meters
- Up to 28 meters

P4	Building Heights Reduced	09/03/22	JD	CC
P3	Redline updated	09/12/21	JD	CC
P2	Heights amended	15/10/21	JD	MF
P1	Initial Issue	16/09/21	JD	MF
Rev	Description	Date	By	Chk

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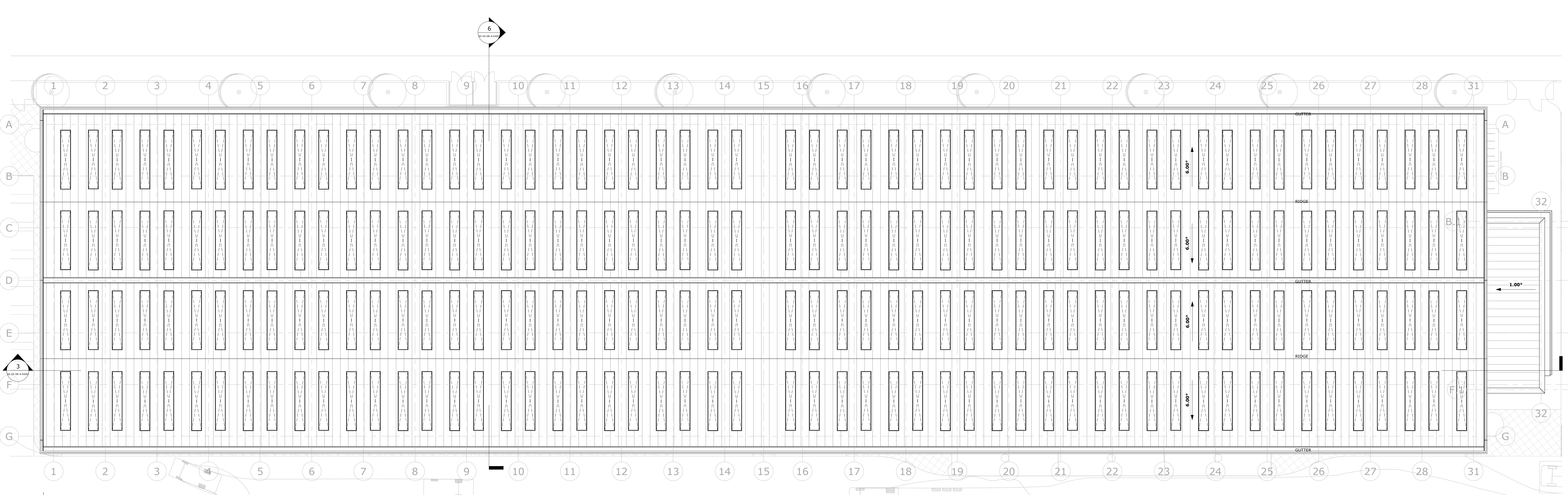


Project  
**Montagu Industrial Estate Enfield**

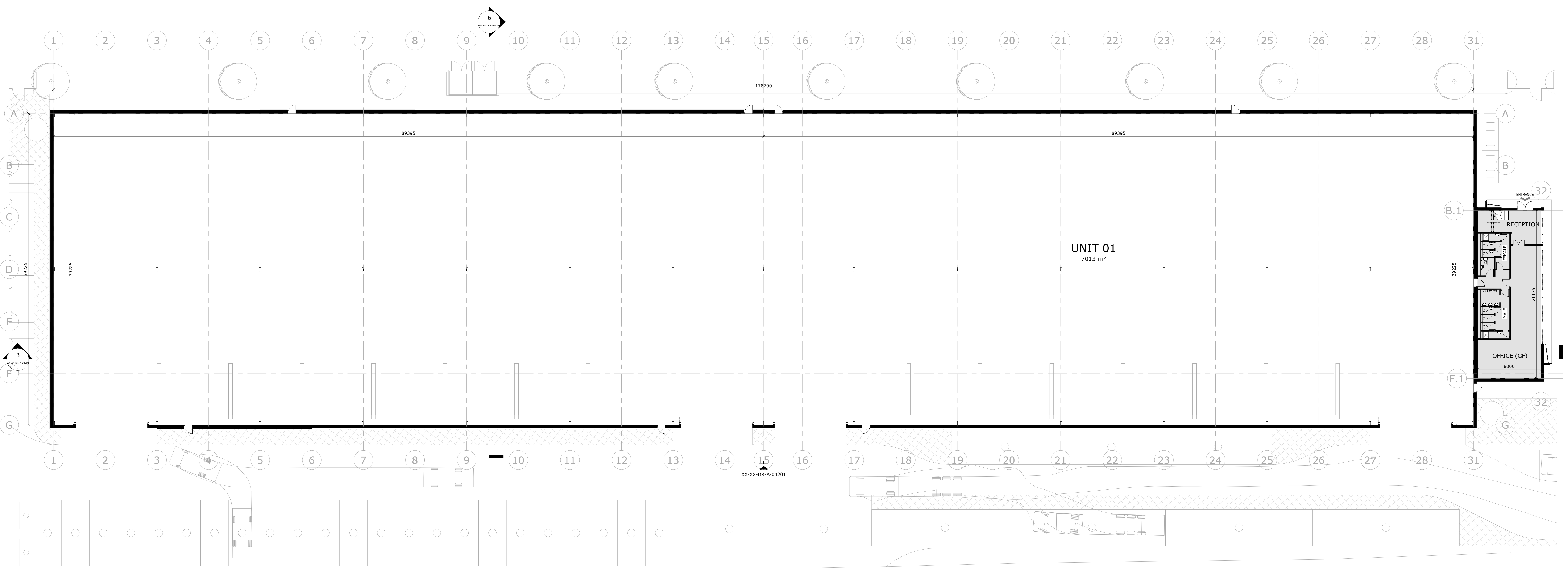
Drawing  
**Building Heights Parameter Plan**

Scale	Drawn	Date
1:1000@A1	JD	09/21
Drawing Purpose	Status	
FOR INFORMATION	S2	
Ref	Rev.	
1103-JSA-XX-00-DR-A-01202	P4	
Job No. Origin_Zone_Level_Type_Dis_Number		

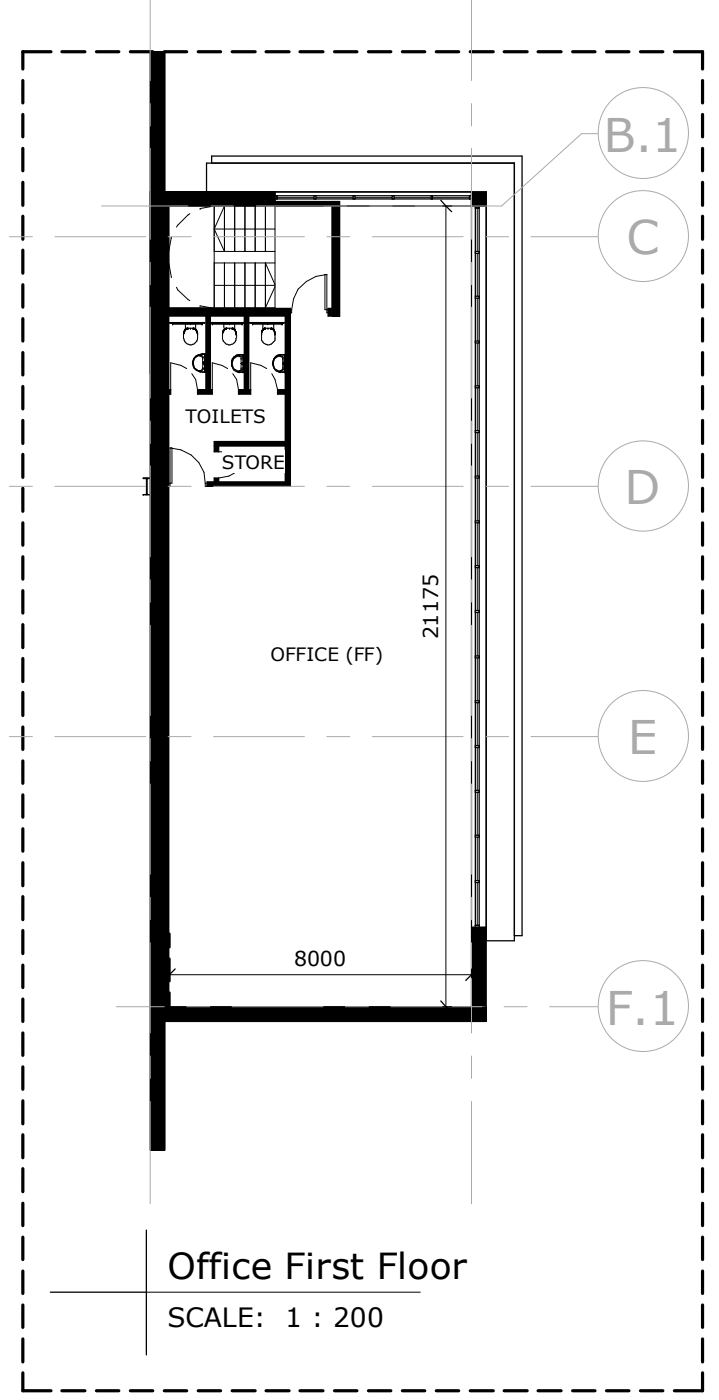




20-Roof Plan - Main Unit  
 SCALE: 1 : 200



00-Ground Floor - Main Unit  
 SCALE: 1 : 200



Office First Floor  
 SCALE: 1 : 200

Rev	Description	Date	By	App
1	Issue for Planning	11/02/21	CC	CC
2	Issue for CC	11/02/21	CC	CC
3	Issue for P2	11/02/21	CC	CC

3rd Floor  
 7.15 Riverside Avenue  
 London EC1R 4SP  
 Telephone +44(0)203 8746707  
 Website www.jeffersonsheard.com

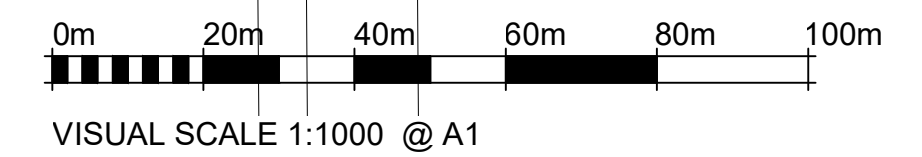


Project  
**NEW WASTE FACILITY  
 MONTEGU INDUSTRIAL ESTATE**

Drawing  
**MAIN UNIT GA PLANS**

Scale	Drawn	Date
1 : 200	CC	JUNE 21
Drawing Purpose	Status	Rev.
PLANNING SUBMISSION	S5	
Ref	1905-JSA-XX-DR-A-02201	P2





Do not scale from this drawing  
 The contractor is to check all dimensions on site and report any discrepancies to the architect  
 All rights described in chapter IV of the copyright, designs and patents act 1988 have been generally asserted  
 Notes

Key	
<span style="color: red;">—</span>	Application Boundary
<span style="background-color: grey; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Development Plots
<span style="background-color: lightgreen; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Landscaping Beyond Plot Demise

Rev	Description	Date	By	Chk
P2	Redline amended.	09/12/21	JD	CC
P1	Initial Issue	16/09/21	JD	MF

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 7-15 Rosebery Avenue  
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Project  
**Montagu Industrial Estate  
 Enfield**

Drawing  
**Development Plots  
 Parameter Plan**

Scale	Drawn	Date
1:1000@A1	JD	09/21
Drawing Purpose	Status	
<b>FOR INFORMATION</b>	<b>S2</b>	
Ref	Rev.	
1103-JSA-XX-XX-DR-A-01200	P2	
Job No. Origin_Zone_Level_Type_Dis_Number		

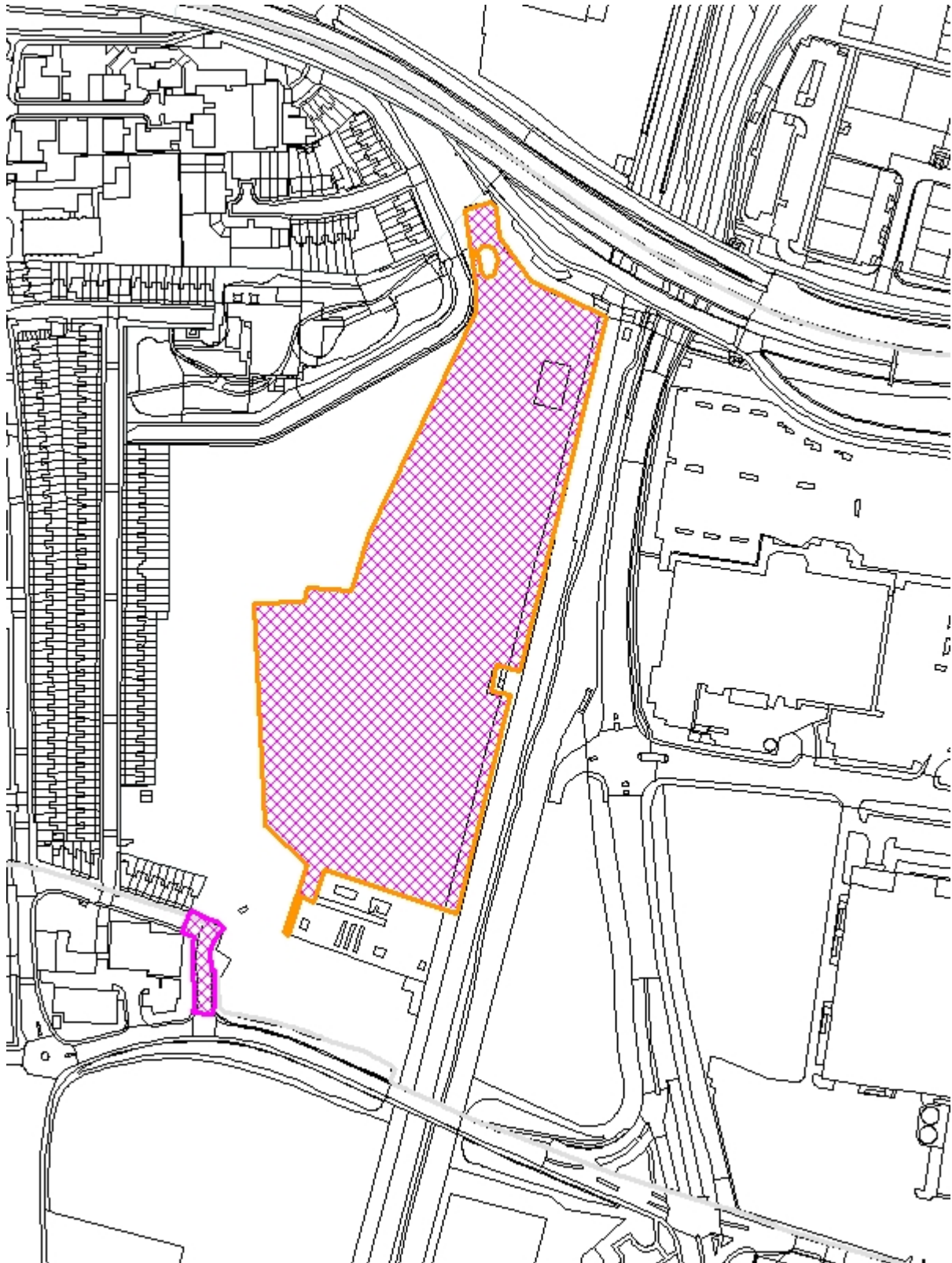
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<b>LONDON BOROUGH OF ENFIELD</b>		
<b>PLANNING COMMITTEE</b>		<b>Date:</b> 20 September 2022
<b>Report of</b> Head of Planning	<b>Contact Officer:</b> Andy Higham Sharon Davidson Karolina Grebowiec-Hall <a href="mailto:karolina.grebowiec-hall@enfield.gov.uk">karolina.grebowiec-hall@enfield.gov.uk</a>	<b>Ward:</b> Upper Edmonton
<b>Application Number:</b> 21/04742/FUL		<b>Category:</b> Major
<b>LOCATION:</b> Meridian Water Willoughby Lane and Meridian Way London N18		
<b>PROPOSAL:</b> Full planning application for development of Phase 1b of Meridian Water to provide new residential accommodation (Use Class C3), ground floor commercial floorspace (Use Class E(a), (b), (g)), leisure floorspace (Use Class E(d)) and medical centre (Use Class E(e)) across three buildings including ancillary areas to these uses, roads and footpaths, car and cycle parking provision, public open space including areas for play, landscaping and drainage; and areas of landscaping and open space for temporary and meanwhile uses.		
<b>Applicant Name &amp; Address:</b> Vistry Partnerships		<b>Agent Name &amp; Address:</b> CBRE
<b>RECOMMENDATION:</b>		
<p>1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to <b>NO OBJECTIONS</b> 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 <b>GRANT</b> planning permission subject to conditions.</p> <p>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.</p> <p>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.</p>		

**1. Note for Members**



Ref: 21/04742/FUL LOCATION: Meridian Water, Willoughby Lane And, Meridian Way, London N18



- 1.1 This planning application is categorised as a 'major' planning application involving more than 10 residential units. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

## **2. Recommendation**

- 2.1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to NO OBJECTIONS being received from the Environment Agency, 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.
- 2.2. 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.
- 2.3. 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 listed below.
  1. Time limit
  2. Approved drawings compliance
  3. Phasing details (delivery of plots with appropriate levels of public realm/open space and road infrastructure)
  4. Maximum residential units/housing mix
  5. Maximum/minimum quantum of non-residential floorspace
  6. No fixing of plant, equipment, roller shutters or associated housing boxes to external facades other than in accordance with approved plans
  7. Telecommunications/ Satellite Strategy
  8. Restriction on permitted development for satellite equipment
  9. Restriction on non-residential operating hours
  10. Accessible housing/wheelchair user dwellings
  11. Compliance with Fire Strategy
  12. Details of planting, landscaping, shared podium spaces, public realm, play equipment, enclosure, treatment of perimeter of the site, treatment of roads, pedestrian and cycle routes, traffic calming measures, hard surface materials, furniture and fixtures, signs, wayfinding
  13. Sustainable soil management
  14. Details of tree planting and maintenance
  15. No works to trees and shrubs within bird nesting season
  16. Details of ecological corridor
  17. Details of external materials/sample panels (facing and roof materials, balcony treatments, window material details, boundary treatment, external rainwater goods)
  18. Architectural detail drawings
  19. Shopfront design code
  20. Detail of shopfronts and signage for respective phases
  21. Larger scale details of Plot D tower crown
  22. Details of Plot D tower-top open space
  23. Details of shuttering/doors/gates to vehicular parking
  24. Venetian blinds fronting deck access (Plots B, C and F)
  25. Station Square water feature details
  26. Southern Square light totem details

27. Green roofs
28. Level access for parking adjacent to Plot B
29. Lighting
30. Cycle parking overall provision details
31. Electrical vehicle charging points
32. Car parking management plan
33. Delivery and servicing plan
34. NRMM emissions compliance
35. Piling Risk Assessment
36. Impact piling restriction
37. Acoustic report for mechanical plant
38. Secured by Design accreditation
39. Secured by Design certification
40. Secured by Design commercial certification
41. SuDS details
42. SuDS verification
43. Construction Logistics Plan
44. Construction Environmental Management Plan (including pedestrian and bicycle access)
45. Site Waste Management Plan
46. Operational Waste Management Plan
47. Construction Waste Management Plan
48. Control of Working Hours and Deliveries to Site
49. Water efficiency
50. Thames Water – Water Network Upgrades
51. Restriction on construction within 5m of water main
52. Installation of internal blinds in accordance with the Overheating Report (July 2022)
53. Energy strategy compliance
54. Energy technical note
55. Energy verification/performance certificates
56. Whole Life-cycle Carbon technical report
57. Circular Economy Statement
58. Urban Greening Factor
59. Compliance with ES and identified mitigations
60. Contamination and remediation (including foundation risk assessment and ground gas measures)
61. Previously unidentified contamination
62. Details of levels
63. Wind assessment and mitigation of amenity areas
64. Wind assessment and mitigation of Meridian Water Station entrance
65. Double glazing specification
66. Meanwhile Use Strategy
67. Pymmes Brook Buffer Zone Details
68. Details of works to Pymmes Brook
69. Eradication strategy for invasive species
70. Bird and bat boxes

### **3. Executive Summary**

- 3.1. Meridian Water is a major regeneration project led by the London Borough of Enfield. Over 25 years, the ambition is to create 10,000 homes and 6,000 jobs, including thousands of affordable homes. Construction on Phase 1a, to the west of the subject Application Site, began summer 2021 following the opening of Meridian Water rail station in 2019. Meridian Water is in Upper Edmonton, within



walking distance of Edmonton Green and Angel Edmonton. It is bordered by Lee Valley Regional Park. The entire masterplan area comprises approximately 85 hectares and is one of the largest developable sites in North London.

- 3.2. In July 2017, outline planning permission was granted for the development of Meridian Water Phase 1 for 725 residential units, a new station and associated infrastructure, 950 sqm retail floorspace, 600 sqm of community floorspace and 750 sqm of leisure floorspace, along with public open space and children's play provision. A minimum of 25% of units were agreed to be affordable.
- 3.3. Since the outline planning permission was granted, the Council was successful in its bid for funding from the Government's Housing Infrastructure Fund, which allocated monies for the delivery of rail works, road infrastructure, flood alleviation and utilities to deliver up to 10,000 homes at Meridian Water. The Meridian Water West Anglia Main Line station opened in 2019, improving the site's connectivity.
- 3.4. In 2020, the Council and the applicant for this proposal, Vistry Partnerships, signed a Development Agreement (DA) for Phase 1. The Council remains landowner of the site. The DA stipulates a commitment to provide 50% affordable housing across the whole of Phase 1.
- 3.5. In May 2021, permission was granted for reserved matters related to Phase 1a (20/03821/RM), setting out scale, layout, external appearance and landscaping for the first 300 units, contained in Plots A and E, and arranged across buildings from 3 to 12 storeys in height. 272 of the 300 units in Phase 1a are affordable, comprising affordable rent and shared ownership homes.
- 3.6. This application is for Phase 1b, the remaining, eastern segment of Phase 1 (the Application Site). The proposal is for 676 additional homes. This is above the balance of 425 homes consented pursuant to the Phase 1 outline permission. As the application includes an uplift of residential units (additional 251 homes) and an increase in the proportion of affordable housing across all of Phase 1, the present application is a full, stand-alone application, rather than a reserved matters application.
- 3.7. The application is for 676 residential units, 1,209 sqm flexible commercial floorspace, a 563-sqm Use Class E(e) medical facility and a 809-sqm Use Class E(d) leisure space. Additionally, the development includes over 8,000 sqm of public open space across three new major squares and parks, and public realm that supports sustainable travel.
- 3.8. The proposal seeks to extend the provision of housing by making more efficient use of land and providing high quality of homes in an area that has been identified as being suitable for higher density growth, adjacent to the Meridian Water rail station.
- 3.9. With this application, 50% of homes across Phase 1 will be affordable, split across London Affordable Rent and shared ownership tenures.
- 3.10. Pre-application discussions have shaped the development to the extent that officers are satisfied that the principles of the proposed scheme are appropriate and have the ability to provide benefits in accordance with the development plan.
- 3.11. The applicant has raised viability challenges associated with delivery of the development in light of rising construction costs and associated market conditions.

The applicant recently provided a full viability appraisal and this has been independently reviewed. The appraisal confirms that with the delivery of 50% affordable housing, the scheme is in deficit. Notwithstanding this, the applicant has indicated a willingness to make S106 contributions but has not yet made a complete proposal. An update will be provided on this before the meeting. Accordingly, the full benefits of the proposal are not presently known. However, the applicant has confirmed that the full Off-Site Open Space Enhancement and Maintenance Contribution (which includes monies towards Suitable Alternative Natural Greenspace mitigations) and Habitats Regulations Strategic Access Management and Monitoring Plan payments will be made in full, as set out in the table in Section 24 of this report.

- 3.12. Also under review is assessment of flood risk to the site, particularly that which is associated with naturalisation measures proposed to Pymmes Brook. Officers expect that the Flood Risk Assessment will suitably mitigate any flood risk associated with these works.
- 3.13. These matters continue to form a part of the consideration of the planning balance and an update will be provided to the Committee.
- 3.14. The primary public benefits of the scheme at this stage can be summarised as follows:
- Optimising the site – making effective use of a brownfield site
  - Making a significant contribution to the Borough’s housing target, with the delivery of 676 homes
  - Delivery of 218 affordable homes, bringing the total across Phase 1 to 491 affordable homes
  - Three new major public open spaces of varying characters and opportunities for leisure
  - Inclusion of a medical space to be offered as an NHS GP surgery
  - A sustainable and high-quality public realm with vibrant ground floor commercial spaces
  - On-site ecological enhancements, including an Ecological Corridor and Pymmes Wood open space
  - S106 contributions towards improvements to open space and public realm
  - Connection to the Enfield District Heat Network
  - Integration of on-site sustainable urban drainage measures

#### **4. Site and surroundings**

- 4.1. The Application Site, Meridian Water Phase 1b, forms the eastern section of the larger Phase 1 site. Phase 1a, which has been granted permission pursuant to reserved matters application, lies to the west of Phase 1b. Together, phases 1a and 1b form Phase 1, which extends to approximately 8 hectares and is located at the westernmost end of the Meridian Water masterplan area. Phase 1b is approximately 3.99 hectares in area and is presently vacant, having previously been used for the storage of gas. Following decommission and removal of the gas holders, the site was remediated by Enfield Council.
- 4.2. Phase 1b is immediately bordered to the north by the A406 North Circular Road, with a section of the Pymmes Brook just inside the site. The West Anglia Main Line and Meridian Water station form the eastern boundary of the Application Site;

to the south is a meanwhile use plot within the Phase 1 outline application, which has been approved to be a construction skills centre. To the west is Phase 1a, which is bounded to its west by the Edmonton residential neighbourhood.

## 5. Proposal

- 5.1. The application is for the development of three plots on Phase 1b: Plots B, C and D with commercial ground floors and residential units above. The proposal additionally delivers three new open spaces as part of the Phase 1 masterplan. Plots A and E have been consented through the Phase 1a reserved matters application. Together, Plots B, C and D (in addition to Plot A on Phase 1a) form a quadrant site plan with the West Anglia Main Line running north-south on the eastern boundary and Angel Edmonton neighbourhood to the west, and open spaces to the north and south.
- 5.2. In all, Phase 1b will deliver 676 residential units, 1,209 sqm flexible commercial floorspace (Use Class E a, b, c, g), a 563-sqm Use Class E(e) medical facility on Plot B and a 809-sqm Use Class E(d) leisure space Plot C.



- 5.3. The public realm and open space configuration generally forms an axis with Station Square in the centre between Plots B and D, a place of arrival from Meridian Water Station. Running north-south is the new Park Street, which extends from the North Circular Road to Leaside Road. Pymmes Wood open space is proposed at the north end of Phase 1b and Southern Park is located at the southern end.
- 5.4. Plot B comprises a ground floor with commercial space fronting Station Square and a medical facility on the east side. Residential lobby and amenity front Park Street. The ground floor roof is landscaped with a shared residential podium garden, which also forms the base for shoulders of between nine and eleven storeys, and a tower in the southwest corner (at the corner of Park Street and

Station Square). Plot B includes 232 units in total made up of London Affordable Rent, market sale and shared ownership tenures.

- 5.5. Plot C is located on the west side of Park Street, just south of Plot A in Phase 1a. Plot C also has a single storey base with leisure space on the east side fronting Park Street. The ground floor is wrapped on the north, west and south sides with three-bedroom, family homes given the quieter location adjacent to Southern Park and larger homes already located on Phase 1a. There is also a shared podium garden in the centre of the building arrangement with seven and twelve storeys located around. The 161 residential units comprise market sale and London Affordable Rent homes.
- 5.6. Plot D is located in the south-eastern corner of the quadrant. The ground floor includes commercial units along Park Street and facing Station Square. Entrances to four-storey townhouse residences are on the south side of the block. There is a shared podium amenity space on the first floor, rising to an eight-storey shoulder along Park Street and a 30-storey tower nearest the trainline. There are 283 units on Plot D for private sale and private rent.
- 5.7. It should be noted that the applicant has submitted a concurrent application for one additional affordable home on Phase 1a (22/00106/FUL). The housing numbers for Phase 1 and Phase 1a, as represented in this report, assume the inclusion of this one unit.
- 5.8. In sum, Phase 1b proposes 676 homes (251 more than the Phase 1 outline permission). This brings the total number of homes on Phase 1 to 977, with 50% affordable and 50% market-rate. The affordable tenures include 49% London Affordable Rent and 51% shared ownership.
- 5.9. Vehicle parking, cycle parking and servicing for all residential buildings will be available on ground floors beneath podia and accessible from driveways on side streets. Some servicing bays are located on Park Street.
- 5.10. It should be noted that the red line boundary of the Application Site includes two plots that are intended to host meanwhile uses: one site north of Plot B and one site south of Plot D. This application does not include any proposal for the use of these plots and the use of these areas of the Application Site is not for consideration within this application. Officers are aware, however, that there is an intention to use the northern site as a community garden meanwhile use, together with the provision of a marketing suit for the overall development and temporary energy centre and the southern site as a construction skills centre meanwhile use. These have been or are the subject of separate planning applications.

## **6. Environmental Review**

- 6.1. The planning application represents EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations) and is accompanied by an Environment Statement (ES). An Environment Statement and supplementary Environment Statement were prepared in consideration of air quality, external daylight, sunlight, overshadowing and solar glare, ecology, greenhouse gas and climate change, ground conditions, noise and vibration, socio-economics, TVIA, transport, wind and water resources in respect of Pymmes Brook.

- 6.2. The findings of the ES as revised are discussed in the body of this report as necessary. Mitigation measures identified therein will be secured by planning condition and/or through the S106 Agreement.

## 7. Relevant Planning Decisions

Application Description	Reference	Status
Development of Phase 1 of Meridian Water comprising up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail (A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground, surface water drainage works, energy centre and associated plant, public open space and childrens play areas, and various temporary meantime uses without structures (landscaping and open space).	16/01197/RE3	Approved 10.07.2017
Submission of reserved matters pursuant to condition 5, part (i) of outline planning permission ref: 16/01197/RE3 in respect of Layout in relation to the Station Building Site only for the new Station Building and platform (to replace Angel Road Station) including a pedestrian link across the railway at the Phase 1 site.	17/02952/RM	Approved 15.09.2017
Erection of a Pressure Reduction Station (PRS) with associated parking, landscaping and access from Albany Road.	17/05006/RE4	Approved 23.01.2018
Details of Reserved Matters (scale, layout, external appearance and landscaping) for 300 units in respect Plots E and A (Phase 1a) arranged across buildings from 3 to 12 storeys in height pursuant to condition 5 of planning permission 16/01197/RE3 dated 10 July 2017 for development of Phase 1 of Meridian Water comprising up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail (A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground, surface water drainage works, energy centre and associated plant, public open space and childrens play areas, and various temporary meantime uses without structures (landscaping and open space). Application includes details pursuant to condition 29 (green procurement plan), condition 63 (biodiverse roof details), condition 65 (Energy statement), condition 86 (wind assessment), condition 71 (cycle parking details) and 73 (car parking details) of the above permission.	20/03821/RM	Approved 24.05.2021
Construction of 3 x single-storey modular buildings to provide a construction skills academy (within use Class F1), together with ancillary structures, external training areas, landscaping, cycle storage and other associated works (temporary permission sought for just over 10 years).	21/02991/FUL	Not yet determined
Erection of one residential unit (Use Class C3) arranged across one building at Meridian Water Phase 1.	22/00106/FUL	Not yet determined

## 8. Consultations

### Pre-Application Consultation

- 8.1. The pre-application consultation was carried out in September 2020, December 2020 and September, May, July 2021, before the application was submitted in December 2021. Due to Covid-19 restrictions the consultation events took place as a webinar format with the opportunity to ask questions.
- 8.2. In September 2020 the initial consultation introduced the site-wide proposals. This took place on 3 days: 5, 8 and 9 September. Following this, consultation events on 3, 4, and 5 December 2020 focussed on Phase 1B. Events on 21, 22, and 23 July also focussed on Phase 1B and the progress of the design.
- 8.3. The applicant identified a consultation area including 4,781 addresses, and also consulted all London Borough of Enfield Councillors. As of January 2021 the consultation events generated 19 responses, based on the questionnaire produced. As of September 2021 a further two completed questionnaires were received.
- 8.4. Community stakeholders were consulted. Members of the Planning Committee were briefed on 27 July 2021 and two meetings took place with REACT on 28 July 2021 and 30 November 2021. Other stakeholders included the Enfield Society, Meridian Angel Primary School, and St John's Church on Dysons Road.
- 8.5. The Applicant's submitted Statement of Community Involvement submitted as part of the planning application describes the response to community engagement as conveying support for the proposal, with interest and questions around the mix and tenure of the housing, the heights of the blocks and security.

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

- 8.6. The proposed development was brought to the Enfield Place and Design Quality Panel (hereby referred to as DRP) on 30 April 2020, 13 August 2020, 01 and 08 April 2021. A summary of the conclusions made, along with officer comment as to the degree to which the applicant has addressed DRP conclusions is outlined below:

01 and 08 April 2021

- *The landscape and public realm proposals are greatly improved and in a good position.*
- *Station square has positively evolved but the design team is encouraged to review the microclimate mitigation approach, drop off and parking arrangement, access of vehicles to the health centre and a more organic approach to the layout of the square.*

Officer comment:

Microclimatic testing was completed as part of the planning submission. Wind baffles and trees have been introduced in the square to address potential issues, and these are considered acceptable.

Any drop off/service bays nearest Station Square have been addressed to ensure pedestrian conflicts are minimised. There is an ambulance bay located nearest the medical space in Plot B, and refuse and delivery bays are accommodated within the podia.

The Station Square is designed with a variety of zones arranged around desire lines. There is less of an orthogonal layout, creating a more organic and informal design, while still maintaining various functions.

- *The streets to the north of Plot B and A appear to be designed for the car, although likely to have low usage by vehicles. This design should be amended to include pedestrian friendly crossing and playspace – more akin to Park Street.*

Officer comment: The street north of Plot B (which is in the red line boundary of this application) has been amended to accommodate trees and crossing points. As many parking spaces and loading bays as possible have been located in building podia. In light of the low provision of parking in this application, the level of parking accommodated in these streets is considered acceptable.

- *Relocating the health centre to the east of Plot B is a positive move and there could now be active frontage and activity to Park Street. However, there are issues remaining with predominance of gym frontage on Plot C and the lack of an active use (café for example) facing onto the southern park.*

Officer comment: There is a borough-wide need to deliver family housing, and finding appropriate locations for housing in higher-density developments presents challenges. The location of a residential lobby and larger, family-sized units opposite Southern Park presents an appropriate location for family homes. A condition is recommended for shopfront details that will help to ensure that the leisure facility frontage is engaging and consistent with other ground floor spaces.

- *Phasing should be planned to allow the maximum amount of public realm and landscape to be delivered in order to maximise public benefit. In particular the square must come forward as one as early as possible.*

Officer comment: A condition is recommended that requires the proposal to be delivered in accordance with phasing plans that will ensure commensurate benefit (such as open space, community facilities) are delivered with Plot construction.

- *The panel is supportive of the proposed meanwhile use on the blocks outside of the application boundary and this has allayed concerns over the use of Meridian One – subject to future details.*
- *The podium gardens are improved but there are still issues around relying on playspace provision (for the whole scheme) with these. These should be seen as a bonus.*

Officer comment: There is play space integrated throughout the scheme, with elements on Station Square, Park Street, large playable space on Southern Park. Phase 1a delivers the largest share of play space for children of all ages. Play

provision has been reviewed by officers and adequate amounts and a good quality are being provided.

- *Plot C and D both feature triplex / duplex units. There is scope for the units in Plot D to be more clearly distinguished from the rest of the podium buildings either through addition of an extra storey or more spacing between the adjacent, taller elements.*

Officer comment: Changes to the detailed design of four-storey units better integrate the maisonettes with the remainder of the block. While there is a difference in scale, this is considered acceptable, particularly because this allows sunlight into the podium courtyard space.

- *Plot D uses the same materiality for the tower and the linear building on Park street. These should be differentiated so that one is reserved for the tower – visible from far views and the other for the scale of the street and southern park. The proposed approach is more appealing on the tower, whereas it emphasises horizontality on the linear block.*

Officer comment: The towers and linear block now include materiality that distinguishes them. Overall, the architecture is high quality and supported.

- *Cycle provision generally seems good but there are specific issues in Plot D and C.*

Officer comment: Cycle storage has been reviewed by transport officers and Transport for London. Details of cycle parking are recommended to be required by condition.

*Greater London Authority (GLA):*

- 8.7. Meetings were held with the GLA and Transport for London on 8 July 2020, 9 February 2021 and 21 September 2021. The GLA were supportive of the principle of increasing the number of units on the wider 1B site to optimise the development potential, and the proportion of affordable housing, with the phase being eligible for the 'Fast Track Route'. The GLA identified that the level of affordable housing and the proportion of family housing could be considered alongside the amount on the wider Phase 1.
- 8.8. The height and massing strategy was supported with the taller elements marking important street corners and the station square. The GLA were supportive of further work on children's play space. Detailed comments were made regarding activation at ground floor from commercial units, daylight received by proposed flats and dual aspect units.

*Transport for London (TfL)*

- 8.9. TfL identified that buses are unlikely to be operating through the site in the future and so the design and layout of the road network should prioritise pedestrian and cycle access, and servicing. A development that provides minimal car parking is supported. Cycle parking should be provided in accordance with the London Plan 2021.

*Environment Agency (EA)*



- 8.10. Two meetings were held with the EA on 22 February and 25 October 2021. The EA asked the applicant to explore design options for the naturalisation of Pymmes Brook involving the removal of all concrete, including the concrete banks and mid-channel concrete wall. A standalone Flood Risk Assessment (FRA) would be required, including the appropriate baseline and the allowance for climate change.

*Secured by Design*

- 8.11. Workshops were held with the Metropolitan Police on 21 May 2021 and 11 October 2021. Discussions concerned several aspects of the development including passive surveillance, window and door specifications, service yards / car parks, communal entrance lobbies and cycle stores.

**Public Consultation**

- 8.12. Public consultation as a result of this planning application involved notification letters being sent to 1,114 neighbouring properties 5 January 2022, a press advert in the Enfield Independent was published 5 January 2022 and 11 May 2022 (with the submission of a supplementary Environment Statement) and 5 site notices were erected 5 January 2022 and again 30 June 2022 (with the submission of a supplementary Environment Statement).

- 8.13. As a result of public consultation, four representations were received, and a summary of reasons for comment is below:

- *Single staircase is not fire safety compliant*

- 8.14. Officer response: The application has been subject to rigorous review by the Health and Safety Executive (HSE), which is the statutory consultee on fire safety for buildings over a certain height. The HSE has undertaken review of the application and the applicant made necessary amendments to comply with fire regulations.

- *Housing offer is predominantly market tenure and does not meet local housing need*

- 8.15. Officer response: The Phase 1 outline application approved 725 residential units of which 25% would be affordable. Following the reserved matters application for Phase 1a, the quantum of housing on Phase 1 was reconsidered and the proposal for the balance of housing on Phase 1b was increased to deliver a total of 977 residential units and a proportion of 50% affordable housing. 50% affordable housing meets London Plan affordable housing targets for publicly owned sites.

- *Insufficient number of family-sized homes*

- 8.16. Officer response: The assessment of unit size mix proposals is based on local evidence of need. The most recent evidence for Enfield indicates that there is the greatest need for 2- and 3-bedroom homes among affordable rent tenures and 3- and 4-bedroom homes among market tenures. 55% of the London Affordable Rent homes provided on Phase 1b are 3- (and some 4-) bedroom homes. It is true that the proportion of larger units among market-rate homes deviates from the evidenced need, with an offer of mostly 1- and 2-bedroom units. Given various site constraints and the priority to provide the highest proportion of affordable

family-sized units, officers acknowledge that the market-rate share of homes does not meet family-sized housing targets but consider that in the overall planning balance this is acceptable.

- *Shared Ownership should not qualify as an affordable housing tenure*

8.17. Officer response: The London Plan includes the most recent policy on affordable housing in the development plan at present. London Plan Policy H6 sets out the split of affordable products that should be applied to residential proposals. This includes a minimum of 30% low-cost rented homes and a minimum of 30% intermediate products, including namely London Living Rent and London shared ownership. The present application proposes 50% low-cost rented units and 50% shared ownership homes as part of the affordable housing offer. This tenure split is policy-compliant.

- *Homes in towers may be affected by the plume from the Edmonton incinerator*

8.18. Officer response: the Environmental Health Officer has commented that the plume goes very high into the atmosphere, due to the efflux velocity of the gases leaving the stack. This is the intention so that the gases disperse over a wide area and the dilution with air results in concentrations falling rapidly from the point of emission.

- *The open spaces are too small in relation to the number of additional homes*

8.19. Officer response: This application for Phase 1b proposes three new, major open spaces on Phase 1: Pymmes Wood, Station Square and Southern Park. This is in addition to the Northern Park already approved on Phase 1a. Additionally, the proposal includes an ecological corridor, new trees, greening of public realm, landscaped building podia and private outdoor amenity. In all, Phase 1 will consist of 1.29 hectares of open space. This is a proportion of 0.58 ha/1,000 residents on Phase 1a, which is considered to be acceptable and appropriately balances provision of open space with the need to accommodate housing on the site.

- *Development too high*

8.20. Officer response: Policy DMD 43 of the Development Management Document resists tall buildings in areas classified as inappropriate, including within and adjacent to the Green Belt, or where heritage assets would be affected. The site is not near the Green Belt or heritage assets. Sensitive locations include locations where development would infringe or detract from important local views, or areas where the existing development is good quality and relatively homogeneous, and the wider area is not considered to be sensitive. Whilst there are streets of residential houses to the west, there are also larger scale commercial and industrial properties to the south-west and east. Therefore, this is not considered to be a location sensitive to tall buildings. The applicant has provided a detailed analysis of the area and justification for a tall building in this location. Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of "tall buildings" are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria). Although not adopted as policy and having limited weight, Figure 7.4 is the most recent assessment of tall building locations

within Enfield planning policy. The Application Site is identified within Figure 7.4, further indicating that the Application Site is appropriate for tall buildings.

- *Increase danger of flooding*

- 8.21. Officer response: The application has undergone review by the Environment Agency (EA) and the Lead Local Flood Authority (LLFA) following the preparation of flood models and Flood Risk Assessment.

The EA objected to the application on the basis that the Flood Risk Assessment provided in May 2022 was unacceptable, the applicant has not sufficiently addressed issues of contaminated land and the applicant has not demonstrated an acceptable naturalisation of Pymmes Brook. The EA acknowledges that the applicant has since suitably addressed the matter of contaminated land and has removed this objection, although conditions related to contamination are expected to be recommended.

The most recent flood model (submitted August 2022) accounts for the conditions on the site pre-development, that is, absent any of the proposed development. The EA has accepted this model. Additional models have been issued to the EA on 5 September, including one that includes the development and some elements of naturalisation to the Pymmes Brook, including mid-channel wall removal and lowering of the southern bank wall and associated mitigation; another adds further naturalisation features such as gravels on the watercourse bed, shelves along the bank and planting. The EA has completed review of the models that are most pertinent to the proposal and has identified several “Amber” issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order for the EA to be able to accept the flood models. The applicant also submitted a Flood Risk Assessment on the 5 September for review by the EA and LLFA. The EA and LLFA have raised initial comments and points of clarification for the applicant, and are liaising closely with the applicant’s hydrology consultants. Again, the EA expressed confidence that the remaining issues can be resolved by the applicant in order to enable the EA and LLFA to recommend conditional approval. Officers will provide an update in advance of the meeting of the Planning Committee.

- *Loss of privacy*

- 8.22. Officer response: It is unclear from this comment what loss of privacy is specifically a concern. The present development, Phase 1b, occupies a site that is not immediately adjacent to any existing residential properties. It is bounded by the West Anglia Main Line on the east, Pymmes Brook and the North Circular Road on the north, Meridian Water 1a to the west (which is presently under construction) and Leaside Road to the south. The proposed development does not introduce any direct overlooking onto residential windows or private spaces.

- *Out of keeping with character of area*

- 8.23. Officer response: The character of the area is varied. There are residential streets to the west, but to the south-west there are commercial and industrial properties on a greater scale. To the east, beyond the railway and Angel Edmonton Road there are large scale retail and other commercial properties. Hence, there is not a uniform character. The proposed development forms part of the wider Meridian

Water regeneration which will have its own character, and the proposed development is a contributing component to this.

- *Over development*

8.24. Officer response: The Phase 1 outline application secures 725 homes on the whole of Phase 1. The Phase 1a reserved matters application was approved for 300 units on that part of the site. There remain 425 units to implement on the remainder of the site under the outline permission. On Phase 1 as a whole, 725 units is a density of 101 units/hectare. With the present application and increase in units to 977 across Phase 1, the proposed density is increased to 136 units/hectare. In light of the Application Site's immediate adjacency to the Meridian Water station, the increasing levels of investment in transport infrastructure at Meridian Water and the increased level of affordable housing (from 25% to 50%) that comes with the proposed uplift in residential units, this resulting density is appropriate for this location.

- *Strain on existing community facilities*

8.25. Officer response: The present proposal includes provision of an on-site medical space that the NHS Clinical Commissioning Group has found to be of a suitable size to meet the needs of Phase 1 residents. The application also delivers a leisure space that is likely to be occupied by a gym. The S106 agreement will secure a contribution to education facilities.

### **Statutory and Non-Statutory Consultees**

8.26. GLA

The GLA issued a Stage 1 report supporting the optimisation of housing capacity on the brownfield site. The GLA acknowledges and supports the delivery of 50% affordable housing across the whole of Phase 1, including Phase 1a and the present Application Site, Phase 1b. An early stage viability review mechanism is required. The layout, design, landscaping, public realm and architectural and residential quality is of a high standard and is strongly supported. The site is identified as suitable for tall buildings and complies with London Plan Policy D9. The GLA recommended further consideration of bus capacity, which was subsequently addressed by the applicant. The connection to the DEN and approaches to greening and drainage were also supported.

8.27. Education

No comment received. There is an education contribution secured via S106 agreements stemming from the Phase 1 outline planning permission. The contribution for Phase 1A is secure. The applicant has represented that viability for this development has become increasingly challenged and has provided a full viability appraisal that the Council is assessing. Any further contribution over and above what has already been agreed for Phase 1A will be subject to review of the development's viability.

8.28. Environmental Health

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

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

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

In order to ensure remediation is completed, conditions are required to protect against risks arising from contamination.

Conditions are recommended that protect existing residents from excess noise from piling and that noise control measures are in place when mechanical plant has been selected.

Conditions are recommended to cover all matters identified.

8.29. Traffic and Transportation

Overall, the proposed approach to traffic and transportation matters is acceptable and meets relevant policy requirements. The applicant has provided a study to locate additional bus stops along Leaside Road; the provision of these will be secured via S106. A series of conditions is recommended to address construction logistics, cycle and vehicle parking, delivery and servicing, parking management and travel plan monitoring.

8.30. Transport for London

TfL is generally supportive of the proposal with the inclusion of conditions that address car parking management plan, delivery and servicing plan, travel plan and construction logistics plan. TfL is interested to ensure that bus network accessibility is provided in the form of additional stops on Leaside Road. The applicant has provided a Leaside Road Bus Stop Options Review (19 April 2022), the details and implementation of which is being secured by S106.

8.31. Haringey Council

The proposed additional bus stops to serve Phase 1 are proposed on Leaside Road on Haringey Council highway. Haringey borders the Application Site immediately to the south. Haringey officers are supportive of the provision of bus stops as set out in Leaside Road Bus Stop Options Review (19 April 2022) and recommend stipulations for the delivery of the bus stops that will be secured via S106.

8.32. Health and Safety Executive

HSE is the statutory fire safety consultee for buildings over a certain height. HSE undertook a rigorous review of the proposal and highlighted an issue of single access for residential uses being shared with ancillary uses, such as waste and bicycle storage. The applicant revised the ground floor plan to separate these uses to HSE's satisfaction. HSE supports the development.

8.33. SuDS Highways

Officers are generally supportive of the SuDS approach and recommend conditions, which are included in the list set out above. Officers presently object to the flood mitigation strategy on the basis that the previously submitted Flood Risk Assessment and the proposal for naturalisation of Pymmes Brook have not sufficiently addressed flood risk. The current position is set out within the relevant section of this report and this issue remains under active discussion with the applicant. An update will be provided at the meeting

#### 8.34. Environment Agency

The EA originally objected to the application on 11 February 2022 and subsequently maintained its objection on the basis that the Flood Risk Assessment provided in May 2022 was not acceptable, the applicant had not sufficiently addressed issues of contaminated land and the applicant had not demonstrated an acceptable proposal for naturalisation of Pymmes Brook. The EA acknowledges that the applicant has since suitably addressed the matter of contaminated land and has removed this objection, although it is expected that conditions associated with contamination will be recommended.

The most recent flood model (submitted August 2022) accounts for the conditions on the site pre-development, that is, absent any of the proposed development. The EA has accepted this model. Additional models have been issued to the EA on 5 September, including one that includes the development and some elements of naturalisation to the Pymmes Brook, including mid-channel wall removal and lowering of the southern bank wall and associated mitigation; the other adds further naturalisation features such as gravels on the watercourse bed, shelves along the bank and planting. The EA has completed review of the models that are most pertinent to the proposal and has identified several "Amber" issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order for the EA to be able to accept the flood models. The applicant also submitted a Flood Risk Assessment on the 5 September for review by the EA and LLFA. The EA and LLFA have raised initial comments and points of clarification for the applicant, and are liaising closely with the applicant's hydrology consultants. Again, the EA expressed confidence that the remaining issues can be resolved by the applicant in order to enable the EA and LLFA to recommend conditional approval. Officers will provide an update in advance of the meeting of the Planning Committee.

#### 8.35. NHS London Healthy Urban Development Unit

HUDU does not raise objection to the proposal subject to a S106 provision securing delivery of the shell and core for the health facility on the ground floor of Plot B. In its review, HUDU applied a calculator that assesses the financial impact of a scheme. In this instance the calculator identified a contribution of £940,000 arising from the proposal for Phase 1b. On the basis that the value of the medical space being delivered exceeds the calculated contribution, the proposal sufficiently offsets the identified contribution. The delivery of the medical space will be secured within the S106 Agreement.

#### 8.36. Clinical Commissioning Group:

The CCG does not raise objections to the proposal for Phase 1b on the basis that a medical space is being provided that the CCG confirms is of an adequate size to meet the needs of the population introduced by the subject proposal. The

CCG does note a comprehensive approach needs to be taken to delivering necessary healthcare facilities for the whole of Meridian Water beyond this phase of development and this will need to be taken forward outside the remit of this application.

8.37. Historic England (GLAAS):

Historic England concluded that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or conditions are therefore necessary.

8.38. Natural England:

On receipt of a Habitats Regulations Assessment (HRA), to understand the development's impacts on the Epping Forest Special Area of Conservation (SAC), Natural England have confirmed no objection to the development concluding the identified impacts on the SAC can be appropriately mitigated with measures identified within the HRA and secured via planning obligation. The S106 will secure these measures.

8.39. Metropolitan Police (Secured by Design):

The Metropolitan Police Service Designing out Crime Unit supports the proposal subject to appropriate conditions and informatives. Conditions are included in the list above.

8.40. Thames Water:

On the basis of information provided, Thames Water would advise that with regard to surface water network infrastructure capacity/foul water sewerage network infrastructure capacity, they would not have any objection to the planning application subject to a series of appropriate conditions/informatives. Conditions as recommended are included in the list above.

8.41. Sport England

Sport England is not a statutory consultee, however requested that the applicant provide an assessment of sporting provision in the vicinity of the proposed development to identify any need arising from the proposal. The applicant provided a description of local facilities and underscored that the proposal includes provision of a leisure space.

Officer comment: London Plan Policy S5, Enfield Core Strategy Core Policy 11 and the emerging Enfield Local Plan policies SP PL5 and SP CL4 set out the strategic responsibility of the Council to ensure adequate provision of leisure and recreational facilities based on assessment of need. In response to the request by Sport England to demonstrate local provision, the applicant prepared a summary of local facilities and reaffirmed the inclusion of a leisure space on the ground floor of Plot C as part of the present proposal. Officers accept that the application provides a leisure space that will contribute to sports provision. The existing S106 agreement stemming from the Phase 1 outline permission secures a contribution towards open space improvements that could further support new/enhanced leisure facilities. Although subject to further viability evaluation, any additional open space contributions commensurate with the uplift in residential units will be secured via a new S106 agreement.

## 9. Relevant Policy

### *National Planning Policy Framework 2021*

- 9.1. The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 9.2. 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.
- 9.3. In relation to achieving appropriate densities paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
  - b) local market conditions and viability;
  - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
  - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
  - e) the importance of securing well-designed, attractive and healthy places.
- 9.4. Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there



are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

- 9.5. 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.
- 9.6. Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”
- 9.7. The Council’s recent housing delivery has been below Enfield’s 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.
- 9.8. 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.
- 9.9. Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 9.10. In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the “presumption in favour of sustainable development” category.

9.11. 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 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.

9.12. The London Plan 2021

GG1	Building Strong and Inclusive Communities
GG2	Making the Best Use of Land
GG3	Creating a Healthy City
GG4	Delivering the Homes Londoners Need
GG6	Increasing efficiency and resilience
SD1	Opportunity Areas
D1	London’s form, character and capacity for growth
D2	Infrastructure Requirements for Sustainable Densities
D3	Optimising Site Capacity through the Design-Led Approach
D4	Delivering Good Design
D5	Inclusive Design
D6	Housing Quality and Standards
D7	Accessible Housing
D8	Public Realm
D9	Tall Buildings
D11	Safety, Security and Resilience to Emergency
D12	Fire Safety
D14	Noise
E11	Skills and Opportunities for All
H1	Increasing Housing Supply (*):
H4	Delivering Affordable Housing
H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H10	Housing Size Mix
S1	Developing London's social infrastructure
S3	Education and childcare facilities
S4	Play and Informal Recreation
HC1	Heritage Conservation and Growth
G1	Green Infrastructure
G4	Open Space
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodland
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI4	Managing Heat Risk
SI5	Water Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy

SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
SI17	Protecting and enhancing London's waterways
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.1	Residential Parking
T7	Deliveries, Servicing and Construction
T9	Funding Transport Infrastructure through Planning
DF1	Delivery of the Plan and Planning Obligations

9.13. Mayoral Supplementary Guidance

9.14. Play and Informal Recreation (September 2012)  
Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.

9.15. Sustainable Design and Construction (April 2014)  
The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.

9.16. The Control of Dust and Emissions during Construction and Demolition (July 2014) The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London.

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

9.18. Housing (March 2016)  
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.

9.19. Affordable Housing and Viability (August 2017)  
Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.

9.20. Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration  
Sets out the Mayor's policies for Estate Regeneration.

9.21. Local Plan – Core Strategy

Core Policy 3	Affordable Housing
Core Policy 4	Housing quality
Core Policy 5	Housing types
Core Policy 9	Supporting Community Cohesion
Core Policy16	Taking part in economic success and improving skills
Core Policy 20	Sustainable Energy use and energy infrastructure

Core Policy 21	Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 22	Delivering sustainable waste management
Core Policy 24	The road network
Core Policy 25	Pedestrians and cyclists
Core Policy 26	Public Transport
Core Policy 28	Managing flood risk through development
Core Policy 29	Flood Management Infrastructure
Core Policy 30	Maintaining and improving the quality of the built and open environment
Core Policy 31	Built and landscape heritage
Core Policy 32	Pollution
Core Policy 34	Parks, Playing Fields and Other Open Spaces
Core Policy 36	Biodiversity
Core Policy 39	Edmonton

9.22. Local Plan – Development Management Document

- DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More
- DMD3: Providing a Mix of Different Sized Homes
- DMD6: Residential Character
- DMD8: General Standards for New Residential Development
- DMD9: Amenity Space
- DMD10: Distancing
- DMD37: Achieving High Quality and Design-Led Development
- DMD38: Design Process
- DMD43: Tall Buildings
- DMD44: Conserving and Enhancing Heritage Assets
- DMD45: Parking Standards and Layout
- DMD47: New Road, Access and Servicing
- DMD48: Transport Assessments
- DMD49: Sustainable Design and Construction Statements
- DMD50: Environmental Assessments Method
- DMD51: Energy Efficiency Standards
- DMD52: Decentralized energy networks
- DMD53: Low and Zero Carbon Technology
- DMD55: Use of Roofspace/ Vertical Surfaces
- DMD56: Heating and Cooling
- DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
- DMD58: Water Efficiency
- DMD59: Avoiding and Reducing Flood Risk
- DND60: Assessing Flood Risk
- DMD61: Managing surface water
- DMD62: Flood Control and Mitigation Measures
- DMD64: Pollution Control and Assessment
- DMD65: Air Quality
- DMD68: Noise
- DMD69: Light Pollution
- DMD70: Water Quality
- DMD71: Protection and Enhancement of Open Space
- DMD72: Open Space Provision
- DMD73: Child Play Space
- DMD78: Nature conservation
- DMD79: Ecological Enhancements

DMD80: Trees on development sites  
DMD81: Landscaping

9.23. Edmonton Leaside Area Action Plan

EL1: Housing in Meridian Water  
EL2: Economy and Employment in Meridian Water  
EL3: Meridian Water Town Centre  
EL5: Community Facilities in Meridian Water  
EL6: The Central Spine and Central Spine Corridor  
EL7: Rail and Bus Improvements  
EL8: Managing Flood Risk in Meridian Water  
EL9: Leisure Facilities and Open Space at Meridian Water  
EL10: Urban Grain at Meridian Water  
EL11: Building Form at Meridian Water  
EL12: Public Realm at Meridian Water  
EL13: Infrastructure Delivery in Meridian Water  
EL21: Improving the Quality of the Pedestrian and Cycling Environment  
EL22: Proposed Pedestrian and Cycle Route - Improvement Principles  
EL23: Enhancing the Bus Network and Services  
EL25: Design of the Road Network  
EL27: Watercourses at Edmonton Leaside  
EL28: New and Existing Green Spaces

9.24. Other Material Considerations

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

9.25. Enfield Draft New Local Plan and Draft Proposals Map

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

9.27. 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.

9.28. Key local emerging policies from the plan are listed below:

- Policy DM SE2 – Sustainable design and construction
- Policy DM SE4 – Reducing energy demand
- Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
- Policy DM SE7 – Climate change adaptation and managing heat risk
- Policy DM SE8 – Managing flood risk
- Policy DM SE10 – Sustainable drainage systems
- Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
- Policy DM BG8 – Urban greening and biophilic principles
- Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
- Policy DM DE2 – Design process and design review panel
- Policy DM DE6 – Tall buildings
- Policy DM DE7 – Creating liveable, inclusive and quality public realm
- Policy DM DE10 Conserving and enhancing heritage assets
- Policy DM DE11 – Landscape design
- Policy DM DE13 – Housing standards and design
- Policy DM H2 – Affordable housing
- Policy DM H3 – Housing mix and type
- Policy DM T2 – Making active travel the natural choice
- Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

## ANALYSIS

### 10. Main Planning Issues

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

- Principle of Development
- Housing Need and Delivery
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### 11. Principle of Development

- 11.1. Enfield's Authority Monitoring Report 2020/2021 shows that during the preceding 10 years, the Borough had delivered a total of 5,616 homes which equates to approximately 562 homes per annum. Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with only 60% of approvals 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.
- 11.2. The Council's Draft Enfield Local Plan (Regulation 18) (2021) acknowledges the sheer scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough.
- 11.3. Enfield is a celebrated green borough with close to 40% of the land currently designated as Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south-east growth corridors. These land designations underpin the need to optimise development on brownfield land. London Plan Policy H1 highlights the urgency to optimise housing provision on brownfield sites, specifically identifying opportunity for housing intensification and development on publicly owned sites. The Application Site constitutes previously developed land and therefore the principle of developing the site for housing to support the Borough's housing delivery target is supported.
- 11.4. The principle of bringing Meridian Water Phase 1b forward as a residential-led development has been established in adopted policy and in the approved outline planning application for Phase 1 (16/01197/RE3).
- 11.5. Enfield's Core Strategy identifies Central Leaside and Meridian Water as a strategic growth area and Place Shaping Priority Area supported by Core Policy 38 to create a new community of family homes and employment opportunities.

80% of the area should comprise a mix of residential, retail, community uses and open spaces, with high quality public realm and higher densities nearest Meridian Water station.

- 11.6. The 2013 Meridian Water Masterplan SPD sets out eight principles for the area's growth, including seizing on the scale of the site to introduce transformative change, delivering new homes of a mix of tenures and types, generating economic benefits, improving physical connections, celebrating the area's water assets, reinforcing communities, and promoting health and sustainability. The area of Phase 1 – identified as the Meridian Angel neighbourhood – is seen as an extension of residential uses to the west, with a density of approximately 1,000 homes supported by transport connections, as well as community facilities and open spaces.
- 11.7. The 2020 Edmonton Leaside Area Action Plan identifies Meridian Water as an opportunity area and the borough's "largest residential-led mixed use development..." Policy EL1 supports maximising the number of homes delivered, provided supporting infrastructure and services are provided alongside, and the overall quantum is a product of good design and incorporates a balanced mix of housing types.
- 11.8. Outline planning permission for Phase 1 (16/01197/RE3), of which the Application Site is a part, was approved to provide 725 residential units, a new station building, retail space, community facility floorspace and leisure space, as well as public realm and open space improvements. With the government grant securing infrastructure at Meridian Water and the opening of the Meridian Water West Anglia Main Line rail station adjacent to the Application Site, the capacity for Phase 1b to deliver additional housing has been re-evaluated. The proposal to extend the provision of housing in Phase 1 is supported by the Meridian Water Masterplan and the Edmonton Leaside Area Action Plan, which seeks to locate density nearest public transport.
- 11.9. The proposal accords with London Plan Policy GG2, which advocates making the best use of brownfield land, maximising publicly-owned sites and finding opportunities for sustainable intensification. Although Meridian Water, as a wider strategic site, is early in its construction, its growth is supported by an AAP and infrastructure strategy formulated to sustain commensurate densities. In reassessing the quantum of housing approved for Phase 1b as part of the Phase 1 outline application, the proposal seeks to make more efficient use of land by extending the provision of housing and significantly lifting the proportion and amount of affordable housing. Given this site has been previously developed and remediated, and forms part of a masterplan for Meridian Water to provide needed homes and jobs, the principle of a residential-led development with densities increased from the Phase 1 outline application is justified.
- 11.10. The Core Strategy (Core Policy 3) and DMD (Policy DMD1) seek a borough-wide target of 40% affordable housing in new developments, applicable on sites capable of accommodating ten or more dwellings.
- 11.11. London Plan Policy H4 outlines the strategic target of 50% of all new homes delivered across London to be genuinely affordable and outlines specific measures to aid achieving this aim. Policy H2 of the New Enfield Local Plan, whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on



development sites and that the Council will set a strategic target of 50% of new housing to be affordable.

- 11.12. The application proposes to increase the amount of housing delivered on Phase 1b over the quantum approved in the Phase 1 outline application. This increase serves both the delivery of more, much-needed housing in Enfield, and enables a higher proportion of affordable housing on Phase 1 than approved in the outline application – the proportion is increased from the approved 25% to 50% proposed as part of this application. This application offers 676 homes on the Application Site; this is in addition to the 301 units being constructed on Phase 1a. Together, with the present proposal for Phase 1b, Phase 1 will deliver 977 homes. Of these, 491 homes will be affordable, representing 50.2% of all housing units on Phase 1. This proportion of affordable housing meets the London Plan target and the emerging Local Plan. As part of the affordable housing offer, 242 (49%) homes are proposed to be London Affordable Rent and 249 (51%) are proposed as shared ownership. The proposed development therefore supports LBE's ambition to build a range of affordable homes to support Enfield residents currently in need as well as those seeking access to the property market. The principle of affordable housing provision is supported.

#### *Principle of development conclusions*

- 11.13. The development has no land-use implications. It proposes an intensification of delivery of homes that is rigorously supported by policy as well as an extant outline permission. The proposal exceeds LBE's adopted affordable housing target of 40% and meets the London Plan's target of 50%. The mix and quantities of uses accord with the Phase 1 outline permission and contribute to Meridian Water as a vibrant, sustainable community. Accordingly, the principle of an increase in housing development on the Application Site is supported.

## **12. Housing Need and Delivery**

### *Housing Need*

- 12.1. The NPPF (Para. 125) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances: .c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF. The London Plan sets a target for the provision of 66,000 new homes across London each year. Whilst Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 60% of approvals in the Borough are being delivered.
- 12.2. The London Plan 2021 identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10 years in the Borough, an increase over the previous target of 798.
- 12.3. Enfield's Housing and Growth Strategy 2020-2030 sets five ambitions, the first of which is 'More genuinely affordable homes for local people'. The ambition sets a priority to maximise housing delivery and use council assets to achieve this. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report, Members discussed the current

housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.

- 12.4. The 2016 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised.
- 12.5. Taking into account the housing needs of Enfield's population, nationally- and regionally-set housing delivery targets and shortfalls in meeting targets, it is evident that this proposal to make more effective use of Council land to provide a greater number of homes, at a high-quality and with a range of housing types is wholly supported by policy.

#### *Affordable Housing*

- 12.6. The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Annex 2 of the Revised NPPF (2021) defines Affordable Housing as “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)”.
- 12.7. London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable with threshold level of affordable housing on gross residential development at 50% on public sector land where there is no portfolio agreement with the Mayor.
- 12.8. Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on sites capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances. In reflection of London Plan targets and the evidence demonstrating the crucial need for affordable housing, emerging Local Plan Policy H2 aims to secure 50% of all new homes in Enfield as affordable.
- 12.9. According to the Enfield Local Housing Needs Assessment 2020, only households with acute housing need are on the Council's housing register, that is, eligible to be given Council housing. The vast majority of those on the register, or waiting list, live in temporary accommodation. Households who are not homeless or living in temporary accommodation rely on housing through the private sector and are typically supported by housing benefit. As of 2020, there were 12,300 households supported by housing benefit in the private rented sector within Enfield. The Assessment concluded that there is an annual net shortfall of 711 affordable rented homes. As the Assessment notes, this shortfall underrepresents the numbers of residents who are not in acute housing need but would still qualify for housing benefit to afford accommodation.
- 12.10. Outline planning permission for Phase 1 (16/01197/RE3) was approved to provide 725 residential units with 25% of these units being affordable. Application 20/03821/RM granted 300 units on Phase 1a to be delivered under reserved

matters. Of the 300 units on Phase 1a, 272 were approved to be affordable. This constitutes a proportion of affordable housing on Phase 1a of 91%. With 300 units approved on Phase 1a under reserved matters, 425 homes remain to be developed on Phase 1b, based on the 725-home total approved in the Phase 1 outline permission. If Phase 1b was brought forward as a reserved matters application, none of the 425 homes would be required to be affordable as the matter of affordability had been secured in the outline application – requiring 25% across all of Phase 1 and already delivered on Phase 1a.

- 12.11. As noted, there is a concurrent application for one additional affordable home on Phase 1a. (22/00106/FUL) This application is for determination on this agenda.
- 12.12. The present application proposes 676 homes on the Application Site, Phase 1b. Of the total 676 residential units, 458 (68%) are proposed to be market rate and 218 (32%) are proposed to be affordable and delivered on-site. This comprises 95 shared ownership homes and 123 London Affordable Rent homes.
- 12.13. As Phase 1 is a single phase in Meridian Water's development, the provision of affordable housing is assessed for Phases 1a and 1b together. Across all of Phase 1, with the present application proposal for Phase 1b, there would be a total of 977 homes. Of these, 486 (49.7%) are proposed to be market rate and 491 (50.3%) are proposed to be affordable and delivered on-site. The affordable units comprise 249 shared ownership homes and 242 London Affordable Rent homes.
- 12.14. The London Plan requires that the percentage of affordable housing on a scheme is calculated in habitable rooms to ensure that a range of unit sizes is provided. The proportion of affordable housing for all of Phase 1, including the present Application Site proposal, in habitable rooms equates to 59.4%. The delivery of 50.3% affordable homes measured in units or 59.4% affordable homes measured in habitable rooms accords with existing and emerging policy and makes the best use of Council land to extend affordable housing provision in Enfield.

### *Housing Tenures*

- 12.15. London Plan Policy H6 sets out the split of affordable tenures that should be applied in residential development:
- a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
  - a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
  - the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- 12.16. Enfield Core Policy 3 and DMD Policy 1 stipulate a borough-wide affordable housing ratio of 70% social rented and 30% intermediate provision.
- 12.17. Although of lesser policy weight, the emerging Local Plan Draft Strategic Policy SP H2 stipulates that affordable housing should be provided with a tenure mix of 50% social rented housing and 50% intermediate housing.

12.18. The development proposes the following affordable tenure split:

Phase	London Affordable Rent	Shared Ownership
1a	119 homes (44%)	154 homes (56%)
1b	123 homes (56%)	95 homes (44%)
<b>Total</b>	<b>242 (49%)</b>	<b>249 (51%)</b>

12.19. The application proposal meets tenure requirements as set out in the London Plan and supported by the most recent borough evidence. The affordable housing offer, in terms of tenure split, is acceptable.

#### *Dwelling Mix*

12.20. 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.

12.21. Core Policy 5 of the Core Strategy seeks to provide the following borough-wide mix of housing:

- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons).
- Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons).
- The mix of intermediate housing sizes will be determined on a site by site basis and the appropriate mix must take into account a range of factors, including development viability and the affordability of potential users.

12.22. The evidence base to support the unit mix set out in Core Policy 5 dates from 2008. More recently, the Local Housing Needs Assessment 2020 was prepared to support the emerging Local Plan and is the most up-to-date source of evidence. Reflecting London Plan Policy H10 A1, Draft Local Plan Policy H3 (while it is not adopted policy), outlines priority types for different sized units across different tenures:

	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

12.23. The Council's Local Housing Needs Assessment 2020 outlines that 41.1% of new affordable homes should have three bedrooms. This is based on housing register evidence. It also outlines that the focus of affordable ownership provision (shared equity/intermediate products) should be on one and two-bedroom units, as the majority of households who live in intermediate (shared ownership) housing are households without children.

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

*Dwelling mix for Phase 1b*

	Studios		1 bedroom		2 bedroom		3 bedroom		4 bedroom	
Market	23	5%	262	57%	169	37%	4	1%	0	0
Shared ownership	0	0%	51	54%	36	38%	8	8%	0	0
London Affordable Rent	0	0%	0	0%	55	45%	67	54%	1	1%
<b>Total</b>	<b>23</b>	<b>3%</b>	<b>313</b>	<b>46%</b>	<b>260</b>	<b>38%</b>	<b>79</b>	<b>12%</b>	<b>1</b>	<b>&lt;1%</b>

*Dwelling mix for all of Phase 1*

	Studios		1 bedroom		2 bedroom		3 bedroom		4 bedroom	
Market	27	6%	266	55%	189	39%	4	1%	0	0
Shared ownership	0	0%	85	34%	125	50%	33	13%	6	2%
London Affordable Rent	0	0%	45	19%	76	31%	95	39%	26	11%
<b>Total</b>	<b>27</b>	<b>3%</b>	<b>396</b>	<b>40%</b>	<b>390</b>	<b>40%</b>	<b>132</b>	<b>14%</b>	<b>32</b>	<b>3%</b>

- 12.25. Taken as a whole, the proposed dwelling size mixes for both Phase 1 and Phase 1b (as in this application) deviate from the adopted policy (Core Policy 5) and the borough-wide evidence of need, providing a larger proportion of one-bedroom units and fewer 3- and 4-bedroom than the evidence indicates needs to be provided.
- 12.26. Looking at the individual tenures, the market housing disproportionately proposes studios, 1-bed and 2-bed homes, and underprovides family-sized 3- and 4-bedroom homes in order to comply with policy and evidenced need.
- 12.27. The application concentrates provision of family-sized homes in the London Affordable Rent component, with the Phase 1b proposal comprising 54% 3-bedroom homes. Across all of Phase 1, including the Phase 1b proposal in this application, the proportion of 3- and 4-bedroom London Affordable Rent homes is 39% and 11% respectively; half of London Affordable Rent homes are family-sized.
- 12.28. The intermediate shared ownership tenure includes 54% 1-bedroom and 38% 2-bedroom homes. London Plan policy directs the Council to consider the dwelling size mix of intermediate tenures based on market evidence. In this regard, the proposal is appropriate and the balance of unit sizes in the intermediate tenure is accepted.
- 12.29. The London Plan makes allowance for site- and location-specific considerations to allow flexibility in applying housing mix standards, as well as enabling a design-led approach to be taken in the optimisation of a site's capacity.

- 12.30. The Government prescribes a “tilted balance” in favour of housing delivery to the Council’s planning decision-making as a result of Enfield’s shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. Development on Council land presents a significant opportunity to provide needed housing. Although not in line with recently demonstrated need, the proposed dwelling mix with a disproportionate provision of one- and two-bedroom homes in the market-rate tenure means that more homes are provided overall. Crucially, the delivery of family sized homes that are proposed in this application has been focused in the London Affordable Rent tenure to offer homes to families with the greatest need. It should be noted again that the 2017 Phase 1 outline permission secured 725 homes and a proportion of affordable housing of 25%. The increase in number of homes proposed as part of this application enables a proportion of affordable housing units of 50% and habitable rooms of 59.4%.
- 12.31. The general site arrangement and development plots were approved as part of the Phase 1 outline application. The plots have been located to create legible circulation, a proportionate street grain, efficient building footprints with enough space remaining for meaningful open spaces, good quality public realm and frontages that appropriately engage with their settings. In a development of this density, family-sized units must be located to provide adequate amenity for all of the residents of the home, with convenient entrances, access to outdoor space and flexibility to adapt as families grow. 3- and 4-bedroom homes have been located on lower floors, with entrances in quieter locations and more convenient access to outdoor amenity. The inclusion of more family-sized units would mean a compromise to the amenity of these units as well as a loss of smaller homes and proportion of affordable housing overall.
- 12.32. Given the evidenced need for new housing, the high proportion of family-sized units proposed within the London Affordable Rent offer, it is considered that the collective benefits of the proposal outweigh the divergence of the dwelling size mix from policy.

### **13. Commercial, Community and Leisure Uses**

#### *Commercial proposal*

- 13.1. The application proposes 2,581 sqm of non-residential floorspace, which includes 1,209 sqm flexible commercial floorspace (Use Class E a, b, c, g) located on the ground floor of Plot B, fronting Station Square and on Plot D facing Park Street and Station Square. Use class E a, b, c and g allow for retail shops, food and drink premises, financial and professional services, offices, R&D functions and residential-compatible industrial uses.
- 13.2. The applicant submitted a Commercial Strategy (November 2021) to inform the types of uses envisioned for the commercial spaces. The Commercial Strategy is not an approved document and is referred to for information only.
- 13.3. The use class E set of uses allow a flexible range of potential occupants of the commercial spaces. Based on the submitted Commercial Strategy, the applicant proposes a range of adaptable spaces that can be left as individual sites or connected to provide larger premises to function as studios, ‘maker’ spaces, light-

scale production or co-working spaces. Enfield Core Policy 17 identifies a Local Centre that will serve the locality. (The emerging Local Plan identifies Meridian Water as a Large Local Centre.) Local Centres provide core shopping and services. Enfield DMD Policy 25 reinforces the criteria for new shopping centres, including uses that support vitality and viability, the design of shopfronts is well integrated into the built environment and that the proposed uses do not cause harm to residents or residential amenity.

- 13.4. As Meridian Water includes a designated local centre, use classes E (a), (b) and (c) are appropriate for providing local shopping, food venues and essential neighbourhood services.
- 13.5. The definition of use class E (g) (iii) provided by the Town and Country Planning (Use Classes) Order 1987 as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 is 'any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.' (Schedule 2, Part A). Enfield policy DMD 23 part 2 states that development of industrial uses outside of designated industrial areas 'will only be permitted if the following criteria are met:
- The use should be compatible with the existing uses in the surrounding area and there should be no adverse impact on the surrounding areas;
  - There should be no adverse impact on the capacity of the local road network;
  - The development should provide adequate on-site parking and servicing for its intended use, including space for waiting goods vehicles.'
- 13.6. Based on the scale of commercial spaces proposed and the fact that the proposal seeks to flexibly tenant the spaces among use classes E (a), (b), (c) and (g), the anticipated amount of use class E (g) uses should be able to comply with policy DMD 23 and not cause any disruption to residential amenity, local road operations or create undue servicing issues.
- 13.7. In order to ensure a cohesive and visually-appealing ground floor presence, it is recommended that there is a condition requiring details of shopfronts and signage zones. They should be designed as a set of unified design elements to help ensure an engaging ground floor frontage and visual consistency, even as occupants may change. Officers support this approach.

#### *Community space proposal*

- 13.8. The Meridian Water Phase 1 outline approval includes a maximum of 600 sqm of community floorspace. The present application for Phase 1b proposes a single community facility on the ground floor of Plot B to be used as a medical facility and approved as use class E (e). The space is proposed to be delivered as a shell and core but has been informed through extensive consultation with the Clinical Commissioning Group to ensure it can be laid out as a functional surgery and is able to accommodate the needed number of GPs. It is intended that the medical space will be leased as an NHS surgery.
- 13.9. In consideration of the proposal, the NHS Healthy Urban Development Unit (or HUDU) advised that, based on the scale of proposed development, the healthcare requirement that should be secured via S106 is £940,000. This sum does not account for the provision of a medical space. Officers have been provided a

market valuation of the medical space conducted by an independent firm. The assessment indicates that the facility is valued in excess of £940,000. In this respect, the provision by the applicant of the medical space satisfies the requirement for the healthcare contribution calculated by HUDU. The S106 will secure this medical space for use by an NHS practice in order to appropriately mitigate the healthcare impact. The proposal for a medical space is considered appropriate and necessary to mitigate the identified healthcare impact.

#### *Leisure space proposal*

- 13.10. In addition to retail and community space, the Phase 1 outline permission includes up to 750 sqm of leisure floorspace. The application proposes a 809-sqm leisure facility on the ground floor of Plot C, fronting Park Street. Use class E (d) allows for indoor sports recreation other than swimming pools, ice rinks, or motorised vehicles or firearms). The submitted Commercial Strategy (November 2021) suggests uses may be bouldering, yoga, a gym or specialist fitness.
- 13.11. As part of the consultation process, the application was referred to Sport England for consideration. Sport England requested that the applicant provides an assessment of sporting provision in the area and demonstrate how the proposal is helping to meet sporting demand, either existing or introduced by the subject development.
- 13.12. London Plan Policy S5, Enfield Core Strategy Core Policy 11 and the emerging Enfield Local Plan policies SP PL5 and SP CL4 set out the strategic responsibility of the Council to ensure adequate provision of leisure and recreational facilities based on assessment of need. In response to the request by Sport England to demonstrate local provision, the applicant prepared a summary of local facilities and reaffirmed the inclusion of a leisure space on the ground floor of Plot C as part of the present proposal. Officers accept that the application provides a leisure space that will contribute to sports provision. The existing S106 agreements stemming from the Phase 1 outline permission secures a contribution towards open space improvements that could support new and/or enhanced leisure facilities. Although subject to further viability evaluation, any additional open space contributions commensurate with the uplift in residential units will be secured via a new S106 agreement. On the whole, the level of sporting provision proposed by this application is acceptable.

## **14. Design**

### *High-quality design and layout*

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



- 14.3. Enfield Policy DMD 37 sets out objectives for achieving good urban design: character; continuity and enclosure; quality of public realm; ease of movement; legibility; adaptability and durability; and diversity.
- 14.4. Being the first phase of the wider Meridian Water development, it is expected that Phase 1 (of which the Application Site is a part) sets a precedent for high quality buildings and spaces. There is an opportunity for the character of the development to draw on the industrial heritage of the area, including the demolished gas holders, to influence the development's identity and a sense of place.
- 14.5. The general site layout was approved as part of the Phase 1 outline permission; the proposed layout conforms to that approval. The internal layout achieves a good level of active frontage to the surrounding public realm, with commercial uses and residential lobbies/doors providing surveillance to the public realm. The arrangement provides a clear division of public and private space.
- 14.6. Aspects of the design proposal are further assessed below. A site plan with building names is provided for ease of reference. Phase 1b proposal is in the red line.



- 14.7. Plot C has a number of larger, family-sized homes that are partially sited at ground floor. These are appropriately located with frontages on Southern Park and opposite townhouses coming forward on Phase 1a. The applicant has used best practice to ensure that these units are maisonettes with dual aspect homes while wrapping the podium with active frontage. With some exception, private amenity areas are located above ground floor, so that these spaces are more private, more likely to be used and less likely to be screened.
- 14.8. The layouts of the plots are generally well resolved.

#### *Density*

- 14.9. The 2021 London Plan has amended the policy approach to assessing density. Whereas previous policy set out ranges of appropriate density based on location

and site access, the current Policy D3 emphasises the importance of a design-led approach to optimise site capacity, including site allocations. This removes the standardisation of density calculations with a more site-specific evaluation.

- 14.10. Adopted Core Policy 5 states that density should balance the need to make the most efficient use of land, account for accessibility to transport and respect existing character. DMD Policy 6 is also guided by the London Plan density matrix (which has now been superseded by current London Plan Policy D3, as above), wanting to ensure scale and form are appropriate, the development is of a high quality and regard is given to housing mix targets.
- 14.11. The Phase 1 outline application secures 725 homes on the whole of Phase 1. The Phase 1a reserved matters application was approved for 300 units on that part of the site. There remain 425 units to implement on the remainder of the site under the outline permission. On Phase 1 as a whole, 725 units is a density of 101 units/hectare. With the present application and increase in units to 976 across Phase 1, the proposed density is increased to 136 units/hectare. In light of the Application Site's immediate adjacency to the Meridian Water station, the increasing levels of investment in transport infrastructure at Meridian Water and the increased level of affordable housing (from 25% to 50%) that comes with the proposed uplift in residential units, this resulting density is appropriate for this location.

#### *Massing and height*

- 14.12. London Plan Policy D9 outlines that Development Plans should define what is considered a tall building for specific localities, the height of which will vary but should not be less than 6 storeys (or 18 metres).
- 14.13. Policy DMD 43 of the Enfield Development Management Plan Document states that tall buildings will not be acceptable in areas classified as inappropriate. The policy defines inappropriate areas as those within or adjacent to the Green Belt or within proximity of conservation areas, nationally or locally listed buildings, scheduled or locally listed ancient monuments, or nationally or locally registered historic parks and gardens. The Application Site does not come under any of these definitions. Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of "tall buildings" are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria). Although not adopted as policy and having limited weight, the Application Site is identified within Figure 7.4, further indicating that the Application Site is appropriate for tall buildings.
- 14.14. The application proposes a tower of 24 storeys on Plot B and a tower of 30 storeys on Plot D, nearest the station. While at the upper end of what would be supported, optimising height here is considered appropriate. The building marks a key rail station with convenient access to the Victoria Line for new residents and the established Edmonton area. It also sits at the access point to a new neighbourhood with cycle ways, pedestrian routes, a new high street and a series of parks and squares, ultimately providing access via new bridges over three waterways into the Lee Valley Regional Park.
- 14.15. The 30-storey building is located to the southeast of Station Square. While some overshadowing will occur, this position means that the square will benefit from

- increasing sunlight from lunch time onwards – a time of day when the square will be enjoyed by restaurant visitors and shop visitors. The octagonal form of this building helps to create an interesting, distinctive and elegant structure.
- 14.16. The 24-storey building is positioned to the north of the square, thereby avoiding overshadowing it. For townscape and legibility reasons, this position is favoured because it gives breathing space to the main tower and helps mark both the location of the station and square when approached from the north and south along Park Street. The simpler form of this building helps to visually defer to the main tower building, while maintaining a high quality and graceful silhouette.
- 14.17. In consideration of London Plan Policy D9, the applicant has demonstrated that there are no adverse impacts to views. The locations and prominence of the 30- and 24-storey towers appropriately mark Meridian Water and the station in the townscape. As discussed below, the proposed architectural quality and materials are strong, and the buildings are not adjacent to or within the setting of heritage assets, a World Heritage Site or the River Thames. The proposal satisfactorily addresses all other areas of impact cited in Policy D9.
- 14.18. The remainder of the blocks are of a significant urban scale, appropriate to the ambitions and character of the wider regeneration area. The massing steps down to the west to meet the lower rise development in Phase 1a.
- 14.19. The perimeter blocks have a strong base/plinth with breaks in the massing at upper floors to allow light into and views out of the courtyards.
- 14.20. While officers find that, overall, the buildings are successful, some of the nuances of the massing might have been further improved, for example:
- The western elevation of Plot D has an unbroken run of 9 storeys with a strong horizontal emphasis. There were mixed views on this approach, with some officers supporting the horizontal emphasis, while others felt this could have been relieved with a line of setbacks.
  - The northeast corner of Plot C could have also benefitted from additional expression, as it sits in direct view of the top of the station steps. With a more recognisable element, it may have offered visual interest and wayfinding point.
- 14.21. However, the application architects are confident in their design approach and given the subjective nature of these points, these are not presented as objections and the massing and height overall is supported.

#### *Architecture and materials*

- 14.22. The proposed architectural detailing is generally of high quality throughout. The extensive use of brick is supported and indicated fenestration, reveals and other details appear well resolved and of high quality. A condition requiring drawings of typical architectural details and another with detailed materials specification are recommended. In addition, in accordance with London Plan policy architectural quality should be secured through architect retention clauses with the S106 Agreement.
- 14.23. The chevron column design on Plot B is strongly supported. The remainder of the tower is well proportioned and detailed when viewed in isolation.

- 14.24. Officers agree that the Plot D tower, as it is the tallest on the site, should be special and visually distinct from the remainder of the development. Ideally, Plot D should reflect some commonality with other buildings on the site, as part of a 'family' of structures, however, the design team advised that amending materiality would increase the depth of secondary elements and reduce the reveal between terracotta bands, which would not be desirable. On balance, and due to the quality of the architecture proposed, the design and materiality of this block is supported.
- 14.25. Officers were very careful to consider the proposal for the Plot D building crown. As the tallest building in Enfield, this would be a feature of significance and the design should be commensurate with its prominence. In many ways, it is a landmark to Meridian Water and Enfield. The London Plan states (Policy D.9.C.1.c) that in the design of a tall building, the "architectural quality and materials should be of an exemplary standard" and that "the top should be designed to make a positive contribution to the quality and character of the skyline". Officers have promoted a crown design that is special, celebratory and memorable. There is concern that the crown treatment is relatively subtle and visually recessive, and that the colour and materiality are likely to be visually lost. Therefore, a condition is recommended reserving additional detail of this feature, including materiality and lighting to allow further development of the crown character, creating a structure that confidently meets the sky and presents an interesting visual termination to the building.
- 14.26. In general, officers would have liked to have seen the scheme integrate more references to the industrial heritage of the site through the use of industrial materials, window proportions and roof forms. Some elements that have been incorporated are Plot D ground- and mezzanine-level treatment references to industrial rooflines, and lighting columns in the Southern Park and station square that echo gas holders. Officers would welcome references to the area's industrial history in the details of furniture and fixtures required as part of the landscaping details condition.
- 14.27. To ensure buildings are constructed in accordance with the details set out in the planning submission, the applicant has included plans, sections, elevations and detail drawings to ensure these elements are captured in the planning decision. A condition is included to comply with the approved drawings.
- 14.28. The success of the ground plane environment relies, in some part, on the vibrancy and activation of commercial and ground floor spaces. While there are several commercial units proposed, particularly fronting Station Square, there are several street-facing supporting uses such as residential lobbies, the recreation space (or gym) in Plot C and medical space in Plot B. To establish and maintain a good relationship with the public realm, a shopfront design code and subsequent details of shopfronts and signage are recommended to be conditioned.
- 14.29. The design and specification of all podium vehicular access shuttering/doors/gates should be the subject of a condition. Semi-transparent surfaces, like perforated metal, to allow daylight and visibility into the interior are preferred. Shutter mechanisms should be concealed.
- 14.30. As per London Plan Policy D4, officers recommend an obligation be included as part of the S106 Agreement ensuring continuous involvement by a high-quality architect, in this instance, the scheme architects, Hawkins Brown and HTA.

## **15. Residential quality and amenity**

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

#### *Aspects*

- 15.2. Policy D6 of the London Plan gives strong precedence to the development of dual aspect dwellings; single aspect dwellings are only acceptable where it is a better design solution to optimise site capacity, and will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 15.3. The proposal provides a high proportion of dual aspect units and this is to be commended.
- 15.4. According to the submitted Design and Access Statement, 97% of Plot B, 99% of Plot C and 98% of Plot D units will be dual aspect.
- 15.5. In order to maximise dual aspect units, deck access has been designed in for building circulation in some blocks. To preserve privacy in windows facing deck access, a condition is recommended that requires a venetian-blind style internal shutter up to eye level, approximately 1.8m in these windows.

#### *Space standards and layouts*

- 15.6. The application includes plans of all of the floors of all of the plots. These have been reviewed. While the individual rooms are not dimensioned in the plans submitted for approval, the applicant provided a document for reference, "Meridian One - Unit Layouts", which includes all of the unit types with dimensions. All units meet internal floorspace standards required by London Plan Policy D6, Table 3.1. and further meet individual room standards (London Housing Design Guide is cited as best practice in section 5.3 of the Development Management Document). Private amenity space will be provided to all units in the form of balconies and/or private gardens.
- 15.7. There are some unit layout comments that the applicant has addressed. Several of the proposed apartments had an open plan layout with no lobby area separating the bedrooms and living/kitchen areas. The applicant added doors in many instances, which is commended, although the issue remains in a few flats. This is unfortunate as noise from common areas can cause disturbance in private bedrooms.
- 15.8. There are a number of instances where bathrooms are located adjacent to external walls with no windows, therefore, no natural light and ventilation, which impacts accommodation quality and is less sustainable.
- 15.9. Likewise, there are instances where communal cores would have benefitted from natural light and ventilation via an external wall.
- 15.10. While officers would have liked to have seen these improvements be made, the layouts and standards of accommodation are overall acceptable.

*Daylight and sunlight*

- 15.11. The applicant has submitted a Daylight & Sunlight Report (2021) 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. What has changed in the approach to assessing internal daylight and sunlight, moving from Average Daylight Factor (ADF) to either Median Daylight Factor or Illuminance. In a note to officers, the applicant states that the new median values are generally lower than previously-used ADF levels. On this basis, officers acknowledge that the submitted assessment assumes more restrictive standards and still find results to be acceptable, as below.

Neighbouring properties: existing neighbouring properties

- 15.12. The analysis of daylight/sunlight impacts to neighbouring properties was performed using Vertical Sky Component which measures the amount of visible sky available from a point on a vertical plane. The impact is 'adverse' if the resulting value is both less than 27% and less than 0.8 times its former value.
- 15.13. The daylight/sunlight assessment submitted by the applicant considers the impact of Phase 1b on all existing bounding properties. The only set of properties that is impacted is Kimberley Road. These rear-facing terraces form the western boundary of Phase 1 and Phase 1a. Phase 1a development sits between subject Phase 1b and Kimberley Road. The analysis examines impacts to the rear, garden-facing windows of the terraced single family, two-storey homes and, in the first assessment, assumes Phase 1a is not constructed, i.e. there are no intervening buildings between Phase 1b and Kimberley Road. Although this scenario is unlikely, as Phase 1a is presently under construction, it helps to identify any impacts specifically generated by the subject proposal.

**Daylight and Sunlight Analysis: Impacts to existing neighbouring properties**

Address	Window	Existing VSC	Proposed VSC	Difference
59 Kimberley Rd	Ground R2 W2	19.6	15.5	21%
63 Kimberley Rd	Ground R1 W1	23	17.6	23.6%
71 Kimberley Rd	Ground R2 W2	20.1	14.8	26.5
<b>75 Kimberley Rd</b>	<b>Ground R2 W2</b>	<b>17.1</b>	<b>13.0</b>	<b>23.9%</b>
81 Kimberley Rd	Ground R1 W1	18.1	14.2	21.5%
83 Kimberley Rd	Ground R2 W5	18.1	13.3	26.5%
85 Kimberley Rd	Ground R1 W1	17.8	13.4	24.6%
87 Kimberley Rd	Ground R3 W4	18.0	13.9	22.7%
89 Kimberley Road	Ground R1 W1	17.5	12.8	26.9%
93 Kimberley Road	Ground R1			
	W3	17.2	12.4	28.1%
	W4	15.7	11.4	27.3%
	W5	18.9	13.6	28.1%
97 Kimberley Rd	Ground R1 W1	17.5	12.3	29.7%
109 Kimberley Rd	Ground R1 W1	17.7	13.6	22.9%

- 15.14. The table above lists all of the windows on Kimberley Road where there is a reduction in VSC that is considered adverse because the reduction exceeds 20% (or less than 0.8 times its former value) and the proposed VSC is less than 27. It is worth noting, however, that in all instances the existing VSC was already below 27, that is, below the minimum expected VSC. The applicant prepared a second equivalent assessment that includes the approved Phase 1a development with the proposed Phase 1b development to determine whether there is any change in impacts to VSC. For all windows that experienced an impact in the first assessment (with Phase 1b but without Phase 1a), there was a greater impact to VSCs with the addition of Phase 1a into the model, with the exception of 75 Kimberley Road, where the impact stayed the same. This suggests that the present proposal, Phase 1b, results in no greater impact to the daylight/sunlight impacts of neighbouring properties and the results of the analysis on existing neighbouring sites are acceptable.

Neighbouring properties: Phase 1a

- 15.15. Average Daylight Factor (ADF) is a measure of the light within a room – specifically the average indoor illuminance (from daylight) on the working plane within a room. ADF has been used to assess the level of light in Phase 1a as a new development that is presently under construction. The assessment measures the impact of the proposed development of Phase 1a, which is immediately to the west of the proposed Phase 1b. Recommendations are ADF of no less than 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

**Daylight and Sunlight Analysis: Impacts to Phase 1a**

Building	Total rooms	Impacted living rooms	Impacted kitchen/diners	Impacted L/K/D	Impacted bedrooms
Block A2	151	0	2	5	4
Block A1	131	2	0	0	18
Block E2.3A	27	0	0	0	0
Block E 1.2	82	0	3	0	0
Block E 2.1	46	0	0	0	0
Block E 2.2	44	0	0	0	0
Block E 2.3	18	0	0	0	0
Block E 1.1	114	0	0	0	0

- 15.16. The table above summarises all of the Phase 1a buildings that were modelled for daylight/sunlight impacts, the total number of rooms assessed in each building and the numbers of living rooms, kitchen/diners, living/kitchen/diners or bedrooms impacted where the ADF fell below recommended levels. All affected rooms are on lower floors (ground, first, second and third floors). In total, 613 rooms on Phase 1a were assessed. Of these, 34 rooms are impacted adversely; this represents 5.5% of windows analysed. Two-thirds of the affected rooms are bedrooms, which carry the lowest recommended ADF, given their primary functions and reliance on natural daylight. In an urban context, the loss of light to rooms on lower floors is a factor of development. Given the low proportion of windows that are affected and the overall very good levels of light in the vast majority of Phase 1a – on balance – the impact of the proposed development in this regard is accepted.

Future occupiers



- 15.17. Average Daylight Factor (ADF) has been used to assess the level of light in the new development. Recommendations are ADF of no less than 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

<b>Block B</b>			
<i>Room Type</i>	<i>Target ADF</i>	<i>Total rooms</i>	<i>Rooms that meet ADF</i>
L/K/D	2%	96	96 (100%)
Living room	1.5%	32	32 (100%)
Bedroom	1%	270	201 (74%)
Living / Dining	1.5%	8	8 (100%)
Kitchen / Dining	2%	32	32 (100%)
Kitchen	2%	8	8 (100%)
<b>Block C</b>			
<i>Room Type</i>	<i>Target ADF</i>	<i>Total rooms</i>	<i>Rooms that meet ADF</i>
L/K/D	2%	87	85 (98%)
Living room	1.5%	33	28 (85%)
Bedroom	1%	237	170 (72%)
Living / Dining	1.5%	4	4 (100%)
Dining	1.5%	2	2 (100%)
Kitchen / Dining	2%	24	21 (88%)
Kitchen	2%	2	2 (100%)
<b>Block D</b>			
<i>Room Type</i>	<i>Target ADF</i>	<i>Total rooms</i>	<i>Rooms that meet ADF</i>
L/K/D	2%	90	90 (100%)
Living room	1.5%	4	4 (100%)
Bedroom	1%	141	127 (90%)
Dining	1.5%	4	4 (100%)
Kitchen	2%	4	4 (100%)

- 15.18. The Internal Daylight & Sunlight Report (November 2021) demonstrates that, overall, the ADF measures are very good; in the large majority of instances, ADF levels exceed standards. The room typology that most experiences ADF levels below standards are bedrooms – making up 93% of deviations. The majority of bedrooms are recessed with balconies, and the overhang element contributes to the lower light levels. Without the balconies, which are a valuable amenity, light levels to bedrooms would be improved. In general, the ADF measures improve on higher floors, where bedrooms on 6<sup>th</sup>, 7<sup>th</sup> and 8<sup>th</sup> floors that were assessed are within 0.2% of target ADF levels. The flat layouts have been designed to prioritise natural daylight to living areas, which is consistent with BRE guidance. Bedrooms, given their primary functions, have lower expected light levels than living rooms and kitchens.
- 15.19. There are only 11 remaining non-bedrooms that fall short of recommended ADF levels. For a proposal of this scale, it is recognised that the considerable majority of living areas have acceptable light levels.
- 15.20. Overall, given the scale of the proposal, practical layouts that respond positively to conditions and beneficial level of amenity, the level of light to units in Phase 1b is considered acceptable.

#### Overshadowing

- 15.21. A review of the development's impact to sunlight on adjacent open spaces, both existing and proposed, indicates that almost all open spaces will generally receive

an acceptable amount of sunlight, measured as a minimum of two hours on 21 March. The only area of deficiency is the shared podium open space on Plot B, where approximately a third of the surface area will achieve a minimum of two hours on 21 March. While not a replacement of private common outdoor space, Plot B is within immediate distance of the Northern Park on Phase 1a and Pymmes Wood being proposed with Phase 1b, both of which offer a variety of outdoor opportunities, including quieter, landscaped space that is available on the podium level. Given availability of alternative spaces for residents of Plot B, the fact that there remains a relatively sunny area of open space accessible to residents towards the square, and the podium is generously planted and serviced by play equipment, and that all other spaces meet sunlight amenity standards, on balance, this amount of overshadowing is accepted.

#### *Inclusive Design*

- 15.22. Policy D7 of the London Plan states that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 of the Development Management Document has similar policy objectives.
- 15.23. The proposal achieves the requirement that 10% meet requirement M4(3) as 'wheelchair user dwellings.' All remaining units meet M4(2) 'accessible and adaptable dwellings' requirements.

#### *Fire Safety*

- 15.24. London Plan Policy D 12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 15.25. This application is submitted with a Fire Safety Statement (November 2021) and RIBA Stage 3 Fire Strategy (November 2021).
- 15.26. The Health and Safety Executive is the statutory consultee on matters of fire safety for buildings of 18m or 7 storeys in height, whichever is reached first. The HSE identified issues of a single escape being used for residential as well as ancillary uses, such as refuse storage and bicycle parking. The applicant made amendments to ground floor plans to separate uses in line with fire regulations. The HSE reviewed these changes and removed objection from its consideration.
- 15.27. The submission was additionally reviewed by LBE Building Control who agreed that the matter of single escape had been satisfactorily resolved in accordance with fire regulations.
- 15.28. It is recommended that planning conditions require compliance with an updated Fire Strategy to reflect compliance with HSE's comments in accordance with London Plan Policy D12 and DMPO 2015.

#### *Secured by Design*

- 15.29. 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.
- 15.30. The applicant engaged with the Designing Out Crime Office of the Metropolitan Police during the design phase, and Enfield consulted the Met during this application review. The Designing Out Crime Officer provided comments.
- 15.31. The Met appreciates that the applicant was proactive in seeking advice on meeting Secured by Design requirements. The Designing Out Crime Officer seeks for the scheme to achieve the Homes Silver Award aspiring to Gold. The Met officer welcomes further engagement on landscaping, lighting and appropriate CCTV measures in an effort to achieve a Secured by Design Gold Award for the whole of Meridian Water.
- 15.32. In order to ensure Secured by Design standards are met, conditions are recommended that the applicant seeks 'Secured by Design' Accreditation prior to commencement and 'Secured by Design' Certification prior to occupation of each building. Further, the commercial element of the scheme should achieve certification at the final fitting stage.

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

### *Open space and landscaping*

- 16.1. London Plan Policy D6 sets out standards for housing quality and requires a provision of private open space to meet the needs of the new and existing occupants of the site and Policy G4 encourages development to provide new areas of open space where possible. The London Play and Informal Recreation SPG sets standards of quantity and quality in the provision of new play spaces. Enfield Policy DMD 72 calls for all new major development to provide open space that is suitable to the needs introduced by the new development. Policy DMD 73 further sets out the Council's expectations around the delivery of play spaces. The emerging Local Plan identifies the value of informal, doorstep and play-on-the-way spaces that are integrated into landscape design.
- 16.2. The Application Site presently includes no open space, either public or private. All of the proposed open space has been designed to be integral to the site plan and to fulfil Edmonton Leaside Area Action Plan Policy EL9, which calls for suitable open space and play space.
- 16.3. On Phase 1, Phase 1a has already been approved to deliver 4,554 sqm of open space. Notable among these spaces is the quarter-hectare Northern Park, a richly-landscaped open space with active and creative play facilities for children of all ages. As Phase 1 has been designed to be a cohesive development, the provision of open space is assessed for all of Phase 1, including Phases 1a and presently-proposed 1b together.
- 16.4. Phase 1b proposes 8,344 sqm of open space comprising three main spaces. The applicant has also included some areas of Park Street in the open space calculation based on the qualities of those areas. With the proposal, the quantity of open space for all of Phase 1 equates to 0.58 ha per 1,000 people based on population yields. Text supporting Policy DMD 72 cites a proportion of 2.37 ha/1,000 residents and the 2021 Enfield Blue and Green Strategy aims for 2.15 ha/1,000 residents. It is important to recognise that these target proportions are

borough-wide figures that are used to guide strategic decision-making and are not site by site standards to be met. The Meridian Water masterplan anticipates a high-density urban development that will provide open space in balance with 50% affordable housing on Phase 1, 676 additional homes, commercial space to support an active station and civic square, a medical facility to accommodate a GP service and a leisure space. This blend of uses is needed to make it a vibrant and viable place. On its own, the approved reserved matters for Phase 1a provide a proportion of 0.61 ha/1,000 residents of open space. Given the higher density of development on Phase 1b, it is commendable that the proposed site plan accommodates a proportionate amount of open space to Phase 1a. The quantum of open space proposed on Phase 1b is accepted.

- 16.5. In general, the landscape approach is of a high-quality and well-considered. The landscape plan appropriately identifies different areas of function and character, and improves connections to existing green spaces and water courses.
- 16.6. Station Square serves as the point of arrival at Meridian Water, with steps to it descending from Meridian Water station. It has many functions, including a landing from the station, transient space for commuters, a dwell space for people meeting and visiting commercial spaces, spill out space and a setting for tall buildings. The square is framed by the station on the east, Plot B on the north, Plot D on the south and Park Street on the west. Although severed by the rail line, the Square is an extension of Meridian Water's Central Spine on the east side of the tracks, with a focus of active, commercial frontages on the ground floor. Station Square has the qualities of a civic space, with seating integrated into the landscape, a feature fountain and room for café seating spilling from bordering shopfronts. Desire lines have been considered, providing movement corridors to the northwest and southwest corners of the square and converging on the station steps, with the landscape geometries reinforcing these routes.
- 16.7. The primary concern of officers has been the positioning of trees covering the majority of the centre of the square. The trees infringe upon the potential uses of the space (for markets, events, for example) and impact views through and legibility of the space. The applicant does not wish to amend the proposal. It is acknowledged, however, that trees have the advantage of providing visual relief and softening an area predominantly hard surfaces; they provide habitat, shading, wind and flood mitigation. While it is still the officers' view that the trees will challenge the functioning of the square as a fully adaptable civic space, a condition is recommended that requires details of the tree species selected for this space that will enable installation of stalls or similar structures, such as food trucks, of a certain height.
- 16.8. The inclusion of a water feature is strongly supported. However, details of the design and materials are not provided on the plans and therefore this should form the subject of a condition.
- 16.9. On balance, Station Square is designed to be a high quality space that will become the centre of Phase 1.
- 16.10. Pymmes Wood in the north of Phase 1b is intended as an open space prioritising the promotion of ecology and biodiversity, made up of native planting, integral habitats for a diversity of species and making the most of its waterfront location on the Pymmes Brook. Pymmes Wood is landscaped to be largely uninterrupted, allowing wildlife to prosper, with seating and walking paths along a circular path that winds around planting. Pymmes Wood is proposed to be a beneficial addition

to the open space provision on Phase 1. Despite level changes, inclusive access is maintained from the west and south and throughout the interior. The space is well designed, with interesting raised boardwalks and paths encouraging use for informal recreation and exercise, while providing more open areas for activities to take place. It addresses policy calls for increased green infrastructure, biodiversity and improved access to watercourses. While Pymmes Wood's attractiveness is based in its character as a quiet and serene space, it is crucial that the selection and placement of planting maintains clear visibility into and from the park.

Adjacency of Pymmes Wood to the North Circular, Pymmes Brook, rail bridge on the east, and pressure reduction station on the west means sight lines from Phase 1b need to be maintained. Officers recommend that the condition for planting details includes details specific to Pymmes Wood to ensure planting is appropriate to the maintenance of sight lines.

- 16.11. An important element of Pymmes Wood and Phase 1 is the naturalisation of Pymmes Brook. In addition to river restoration, the works to Pymmes Brook will enable flood management, as further discussed in the flood policy consideration. The Phase 1 outline permission requires the naturalisation of the segment of Pymmes Brook within the Application Site and it is expected to be delivered with Phase 1b. Enfield Core Strategy Core Policy 29 supports river restoration, Core Policy 38 maintains this objective specifically for Meridian Water. Development Management Document policy DMD 75 promotes the unlocking access to waterways. Policies EL12, EL27 and EL28 of the Edmonton Leaside Area Actions Plan require the enhancement of watercourses and restoration of rivers, namely Pymmes Brook, among others.
- 16.12. The applicant submitted a "Pymmes Wood Sketchbook" (July 2022) and corresponding drawings setting out the proposal for naturalising the Pymmes Brook. The document includes a lowering of the southern bank wall along the Pymmes Wood northern boundary, removal of the mid-channel wall, in-channel floating structures to support vegetation and wildlife, shelves with aquatic planting, gravels on the channel base and planting transitioning into the park. In principle, these naturalisation measures are supported by officers and are consistent with the intention for naturalisation required in previous approvals.
- 16.13. On 5 September, the applicant submitted flood models and a Flood Risk Assessment, which include the elements of naturalisation represented in the submitted Sketchbook, as well as mitigation to the lowering of the southern brook wall that involves constructing a raised bund 5 metres inland of the brook edge, which impacts the proposed design of the Pymmes Wood. The EA has completed review of the models that are most pertinent to the proposal and has identified several "Amber" issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order for the EA to be able to accept the flood models. If the EA and LLFA accept the models and corresponding FRA, it is anticipated that conditions will be recommended, including one that requires details of the naturalisation works, and any associated updates to the model and FRA. In landscaping and ecological terms, the principles of the naturalisation proposal set out in the "Pymmes Wood Sketchbook" are acceptable. However, without an understanding of the flood risk introduced by these interventions, the EA and Council water courses officers have not yet been able to fully remove their objections on grounds of flood risk. Discussions are on going to resolve the residual issues and Officers will provide an update in advance of the meeting of the Planning Committee.

- 16.14. The Cadent pressure reduction station (PRS) which has been separately consented occupies a brook-front area immediately to the west of Pymmes Wood. It is understood that the PRS and corresponding utilities require protection and there will be measures to prevent access to the space. It is essential that the landscaping and any fencing or barriers surrounding the PRS area are of a high quality and integrate appropriately into the landscaping – they cannot detract from the quality or experience of Pymmes Wood. As part of the condition requiring planting details, as well as details of treatments and furniture, details will be required for any landscaping, additional enclosure, between the PRS existing walled enclosure and the Application Site area or boundary.
- 16.15. The Southern Park at the southern end of Phase 1b adjacent to Plot C comprises a large circular area of open lawn surrounded by scattered 'woodland' nearest the highway to enclose the park. Paths cross through and around the grass. The lawn is lowered to allow attenuation in certain flood events, and there is additionally a swale at the southern tip. The park is a suitable complement to the other larger open spaces on Phase 1 – it is open with sparse furniture, allowing adaptable passive and active use by visitors. The southern park is a positive element that punctuates the routes to the station from the south and western entrances to Meridian Water Phase 1. The circular form of the space and use of totems reference the heritage of the site through the form and materiality of the gas holders. The detailed design of the totems will be essential in achieving the desired result and should be secured via a condition.
- 16.16. The application also proposes enlargement of the open space at the entrance to Phase 1 from Leaside Road, in addition to the area in the Phase 1A application. This delivers a more joined-up approach to the entrance.
- 16.17. Connecting the proposed open spaces and functioning as a spine on Phase 1 is Park Street. While the street includes carriageway for two-way vehicular access, most of the street width is programmed with landscaping and pedestrian space. On-street parking is limited, reinforcing the importance of this street and aiding legibility by marking the route as significant in reaching the rail station. There is a 3-metre footway on each side of the street. On the east side, the footway is separated from roadbed with a 1.25-metre planting strip. On the west side, there are 'garden' strips of between 4.2 to 5.7 metres in width that sit between the pavement and roadbed. The garden beds include planting, seating and play features such as stepping stones and sensory elements like fixed instruments. There are loading bays to support commercial and residential uses located at a few points along the street. The ambition of Park Street is supported – it is thoughtfully designed to be a prominent green feature that sets a desirable example for Meridian Water. The success and longevity of the street relies heavily on the selection of planting, trees, materials and long-term maintenance.
- 16.18. The application includes General Arrangement plans, Planting Plans and an Outline Planting Schedule. A condition is recommended that the landscaping, public realm and highways improvements should be built out in accordance with the General Arrangement Plans, and that finer details of the hard and soft landscaping, alongside details of enclosure, lighting, bins, baffles and furniture/play equipment are submitted for review. The condition should clarify that the Planting Plans and Outline Planting Schedule are indicative and officers may advise alternate, comparable solutions to the ranges set out in the strategy when details are reviewed and soil volumes to support the planting are fully resolved. As has been noted, there is an opportunity for the details of these elements to

reference the industrial heritage of the site; this will be encouraged when detail applications are made.

- 16.19. The open space at the top of the tower in Plot D presently has no planting or furniture. It is understood that this is being delivered to “shell and core”, therefore the treatment of this space should be the subject of a planning condition. Generous planting, seating and other residential amenities should be provided in the space. The inclusion of structure planting and trees will further refine this tower top element.
- 16.20. In sum, the landscaping approach is supported. In addition to the spaces approved in Phase 1a, the present proposal for Phase 1b together provide a varied and rich choice of open spaces to serve the needs of residents and visitors to Meridian Water. They have been designed carefully to function as open spaces while having the potential to provide considerable ecological benefits. Good maintenance will be key to the success of the open space, an Estate Management Plan is being secured via S106 that will set out the maintenance of the site.

#### *Play space*

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

#### **Phase 1a and 1b child yields and play space required**

	<b>1a child yield</b>	<b>1b child yield</b>	<b>Total child yield</b>	<b>Required</b>
Age 0-4	67.2	134.1	201.3	2,013 sqm
Age 5-11	71.8	134.2	206	2,060 sqm
Age 12+	61	67.7	128.7	1,287 sqm
<b>Total</b>				<b>5,361 sqm</b>

- 16.23. In addition to the areas of play already approved as part of Phase 1a, Phase 1b proposes various play amenity interspersed throughout the site plan. In total, all of Phase 1 will provide 1,886 sqm of doorstep play, which is also referred to as play on the way, or incidental play. This type of provision is integrated into landscaping and most suited to the youngest age groups, generally 0-4 years. For ages up to 11 years old and youth play for ages above 11 years, local playable and youth space are needed. Local playable space is delivered on Phase 1a within Northern Park and an open space along the western border of Phase 1a. Youth play is provided in Northern Park and further available on Southern Park. In total, there are 5,461 sqm of play area accommodated on Phases 1a and 1b, which just exceeds the requirement based on child yields.
- 16.24. In terms of quality of play space, the London Play and Informal Recreation SPG further sets out what form play space should take relative to the size and nature of

the development. This proposal generates a requirement for all play types: doorstep play, local playable space and youth play. Doorstep play is extensively incorporated into Phase 1b, with informal features provided on all three building podiums, on Station Square and along Park Street. The naturalistic, cohesive and incidental nature of the play features is a strength and complies with the direction of play design promoted by the London Plan, adopted guidance and increasingly Enfield emerging policy. Local playable space is generally suitable for children up to age 11 and should have natural landscaping, integrated play equipment for swinging, sliding and climbing, space for ball play and seating for supervision. A neighbourhood playable space is larger and allows for biking, skateboarding, basketball and lots of active play. A diversity of play features and opportunities for a range of ages is designed into Northern Park, which totals 2,500 sqm. Southern Park makes a further addition of open, flexible play area.

- 16.25. In conjunction with play provision on Phase 1a, the proposal for play amenity on Phase 1b is suitable, well-designed and appropriate for Phase 1 or Meridian Water.

### *Trees*

- 16.26. Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.
- 16.27. At a local level, Policy DMD80 of the Development Management Document stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Draft Local Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect. Additionally, Policy DMD 81 of the Development Management Document refers to landscaping.
- 16.28. As Phase 1b is a brownfield site that was recently cleared and remediated, there are no existing trees and no trees are proposed to be removed in aid of the proposed development.
- 16.29. The application includes a series of General Arrangement plans that include locations and indicative selections of hardscape, edgings, railings, furniture and play equipment. These are accompanied by a series of Planting Plans that show indicative soft landscaping features, and an Outline Planting Schedule with selections of plant and tree species. These drawings have been further supported by a Landscape Design Statement (December 2021) that illustrates the intent for areas of open space.
- 16.30. In order to further inform the viability of the tree strategy, the applicant provided Tree Pit Volume Sketches demonstrating the sizes of tree pits. While the extent of tree planting and ambition of the landscape strategy is welcomed, there is concern that the soil volumes in many locations are too small to support larger trees, which limits varieties to small tree species. Trees are also shown to be planted densely or in areas too close to hardstanding, which could lead to competition and stunting. In order to accommodate larger species, greater canopy cover and



include the types of trees that are suitable to the scale of development at Meridian Water, it is recommended that a further detailed planting plan is conditioned. The planting plan should:

- have generously-sized tree pits that can accommodate a range of species, including larger species and trees that can grow to more advanced maturity, provide cover and enhance biodiversity;
- distribute tree pits and planting areas to allow space for vigorous growth, away from the edge of hardstanding;
- design underground space with generous soil volumes and planting space to allow space for roots; this does not need to be dictated by the geometry of hardstanding above;
- provide a palette of tree species that range in size and are appropriate to the scale and quality of development.

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

- 16.31. Natural England wrote to relevant Councils on 20<sup>th</sup> September 2018, in relation to the establishment of the Epping Forest Special Area of Conservation (SAC) Strategic Mitigation Strategy. Natural England have established a recreational 'Zone of Influence'. Any residential development (proposing 100 plus units) within 6.2km of the SAC is required to deliver a package of avoidance and mitigation measures as well as make a financial contribution to strategic measures as set out within the costed Strategic Access Management Measures. This is to adequately mitigate, on a site by site basis, any recreational impact on the SAC that is located within the Zone of Influence.
- 16.32. Natural England were consulted on this application and outlined the applicant should be supported by a Habitats Regulations Assessment (HRA). The applicant provided a Shadow Habitats Regulations Assessment (June 2022) and subsequently a revised Shadow Habitats Regulations Assessment (August 2022), which were submitted to Natural England.
- 16.33. Natural England confirmed that they agree with the assessment conclusions and, providing all mitigation measures outlined within the HRA are secured, Natural England has no objection and considers any impacts on the Epping Forest Special Area of Conservation (SAC) and underpinning Site of Special Scientific Interest (SSSI) can be appropriately mitigated. The mitigations measures that Natural England has agreed to and will be secured via S106 are:
- Appropriate SAMM payments for each housing unit coming forward as part of the development.
    - It has been agreed with the applicant that the appropriate SAMM payment is £14 per unit.
  - Appropriate SANG payments to go towards the avoidance and mitigation measures outlined in the Shadow HRA dated August 2022. The measures identified comprise:
    - £600k towards the Quieter Neighbourhood / Claremont Street route
    - £800k towards Florence Green Park and associated neighbourhood greening
    - £100k towards Angel Edmonton greening

The above amounts are contributions made in the form of Off-Site Open Space Enhancement and Maintenance Contributions secured in the S106 agreement attached to Phase 1 outline permission

Natural England accepts, as mitigation, a further £521,379 Off-Site Open Space Enhancement and Maintenance Contribution arising from the uplift in residential units proposed as part of this application which will also be secured as part of any S106 Agreement.

- 16.34. The applicant's Shadow HRA is being assessed by the Council's Ecological Consultant, having already been assessed by Natural England who have confirmed that they agree with the assessment conclusions subject to all avoidance and mitigation measures outlined within the HRA being secured. An update will be provided to Committee to confirm that the HRA can be adopted by the Council as Competent Authority in order to comply with the Habitat Regulations. It is considered that the development will not give rise to significant effects on the Epping Forest SAC, a European designated site subject to securing through the S106 Agreement the above identified avoidance and mitigation measures.

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

- 16.35. Policy G5 of the London Plan sets an Urban Greening Factor target score of 0.4. The Urban Greening Factor calculation included in the Landscape Design Statement (December 2021) submitted with the application provides a score of 0.47, which exceeds the London Plan target for residential development. This is considered acceptable.

### **17. Biodiversity and Ecology**

- 17.1. The NPPF (Para.174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. London Plan policy G1 requires developments to provide elements of green infrastructure. Policies G5 and G6 requires developments to incorporate urban greening, manage impacts on biodiversity, secure a net biodiversity gain and provide access to nature. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. Development Management Document policy DMD 78 requires major development to maximise opportunities for nature conservation. Draft Local Plan policy G14 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough. The emerging Local Plan, although of lesser policy weight, includes Policy BG3 which refers to a minimum of 10% net gain.
- 17.2. The provided Biodiversity Metric 3.0 calculation tool developed by Natural England yields a 20.02% increase in habitat units, a 100% increase in hedgerow units and a 31.2% increase in river units. Based on these calculations, the development results in a net gain in biodiversity, well in excess of policy.
- 17.3. The Core Strategy Policies Map identifies the rail line as being in a Wildlife Corridor and the Edmonton Leaside Area Action Plan Policies Map identifies the track as being a Site of Local Importance of Nature Conservation.
- 17.4. The proposal includes an ecological corridor that runs along the length of the rail line to a width of six metres, only interrupted by the station stairs, and terminating

in Pymmes Wood at the north of the site. The corridor is proposed to be planted, landscaped and arranged to promote a diversity of species habitats. Planting will provide sufficient woodland canopy to attract wildlife and allow opportunities for retained water. The corridor will comprise scrub and woodland, wet areas, grassland and wildflowers, areas of gravel and structures such as bat boxes. To overcome the separation by the staircase, trees are planted either side of the station. A condition is recommended that the details of the ecological corridor be submitted for approval. Additionally, there will be a requirement provisions in the S106 Agreement to cover details of any for maintenance and monitoring of the ecological corridor..

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

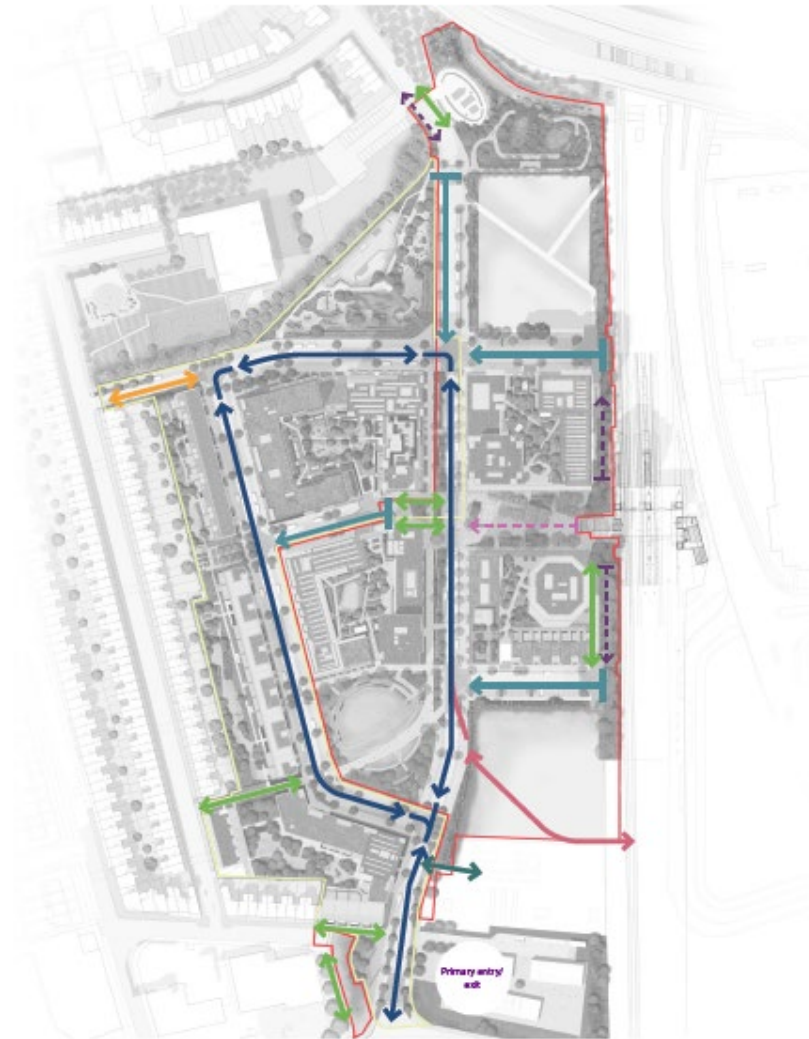
- 18.1. London Plan (2021) Policy 6.1 encourages partnership working in terms of transport and development that reduces the need to travel, especially by private vehicle whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy supports measures that encourage shifts to more sustainable modes of transport. The London Plan 2021 Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 18.2. Other key relevant London Plan policies include:
- Policy T2 – sets out a 'healthy streets' approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
  - Policy T3 – requires new development to safeguard sufficient and suitably located land for public and active transport;
  - Policy T4 – calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and
  - Policy T5 – promotes the provision of an accessible and safe bicycle network with cycle routes and sufficient cycle parking;
  - Policy T6 – indicates that car-free development should be the starting point for all locations that are well-connected by public transport and requires parking bays for disabled persons.
  - Policy T7 – makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 18.3. Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel

choice across the Borough is enhanced to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

- 18.4. The Edmonton Leaside Area Action Plan Policy EL6 identifies the Central Spine as being key to connecting sites within the Meridian Water masterplan itself, as well as being a vital infrastructure corridor. While an essential link to Phase 1b, the Central Spine is east of the Application Site and the Meridian Water rail station. Policy EL7 calls for rail and bus improvements.

*Pedestrian connectivity*

- 18.5. As a large brownfield site that has been cleared and remediated in recent years, Meridian Water Phase 1 presently has temporary pedestrian access through the site to allow a route to the station. Permanent walking routes to and through the site are lacking or compromised by major, predominantly vehicular roads such as Leaside Road to the south of the Application Site, Angel Edmonton Road to the east and the North Circular Road to the north. Although more granular in its street layout, the Edmonton neighbourhood to the west backs onto Phase 1 with Kimberley Road, a long uninterrupted row of two-storey terraces with no point of access into the site, although access points are being created as part of Phase 1 works.
- 18.6. The Phase 1 road network begins to stitch the development into surrounding streets whilst also anticipating further development of Meridian Water links to the east, past the West Anglia Mainline.
- 18.7. On the whole, the Phase 1 masterplan delivers an arrangement of streets that prioritises travel in line with the Mayor's Transport Strategy, giving precedence to safe and legible pedestrian access and cycling routes, providing new and reinforced public transport facilities, and finally vehicular and servicing access where essential.
- 18.8. Park Street acts as the central spine extending from the North Circular to Leaside Road, and, while enabling a vehicular loop around Plots A, C and Southern Park, the street is designed to be a generously landscaped route with comfortable areas of paving, incidental play and raised tables at crossings to moderate traffic speeds. East-west routes to the station and to Edmonton give priority to pedestrians and cyclists. Open spaces are also designed to provide clear, cross-cutting paths.



- Primary two way vehicle and cycle circulation
- Pedestrian and cycle only
- Restricted car and cycle two way access
- Secondary two way street
- Service and maintenance and emergency only
- access
- Delivery only pull in space

18.9. A condition is recommended to demonstrate how pedestrian and bicycle access through the site to the station will be maintained during construction.

18.10. The proposed approach makes a positive contribution to pedestrian provision across the Application Site.

*Cycle access and parking*

18.11. The proposed site and road layout beneficially connect the site into the cycle network, including the emerging Green Loop.

- 18.12. Cycle parking will be provided in line with London Plan T5 requirements for both long and short stay, as well as accessible provision.:

#### Cycle parking

	Long stay			Total	Short stay
	Two-tier	Accessible Sheffield	Adaptable and/or cargo		Sheffield
Plot B	330	42	42	414	7
Plot C	220	28	28	276	6
Plot D	416	66	4	486	8
				<i>Total</i>	<i>1176</i>
					<i>21</i>

- 18.13. Cycle parking for commercial uses will meet London Plan standards with at least two short-stay and two long-stay cycle parking spaces.
- 18.14. The street design north of Plot B has been amended to provide level access and crossing points in front of residential cores, particularly to support disabled parking. This is strongly supported. A condition is recommended to confirm level access is maintained for unloading and crossing purposes.
- 18.15. It is recommended that the final parking provision is secured by condition, with detailed drawings clearly stating the types of parking provision and dimensions for all cycle parking, in line with Chapter 8 of the London Cycling Design Standards.

#### *Public transport*

- 18.16. The West Anglia Mainline and Meridian Water station form the eastern boundary of the application site. The nearest bus stop is to the east of the site on Glover Drive served by the nos. 192 and 341 bus routes. At present, the application site has a Public Transport Accessibility Level (PTAL) of 2, on a scale of 0-6b, where 6b is highest and 0 the lowest. This is due to increase as increased bus and rail services are introduced.
- 18.17. The recent approval for Strategic Infrastructure Works (SIW) including a primary road network through the wider masterplan area, and the new pedestrian link across the West Anglia line to Meridian Way will improve bus access for this phase of development. On that basis, buses will not need to operate through this site in the future, and therefore the design and layout of the on-site road network prioritises pedestrian and cycle access as well accommodating freight/ servicing vehicles.
- 18.18. The SIW will result in the reconfiguration of bus stops on Glover Drive. Nonetheless access to these stops will be via the signal crossing on Meridian Way. This means that parts of Phases 1a and 1b are about 400 metres from these stops. In order to mitigate distances from bus service, the applicant submitted the Leaside Road Bus Stop Options Review (19 April 2022) which recommends locating two bus stops on Leaside Road on LB Haringey highway. Following review of the study by Enfield, Haringey and TfL officers, it has been agreed that S106 obligations secure detailed design work, a Road Safety Assessment and further review by Enfield, Haringey and TfL before being delivered.

#### *Vehicular Access and Parking*

- 18.19. It is supported that the main vehicular access into Phase 1 is from Leaside Road. The street configuration enables a two-way vehicular loop around the site on the

west side of Park Street, encircling Plots A, C and Southern Park. This provides adequate car entry into Phases 1a and 1b. Service, maintenance and emergency access are available to Park Street from the north. The prioritisation of road provision for pedestrians and cyclists accords with the low parking provision for Phase 1b, which supports improved public realm, healthy streets principles and road safety.

- 18.20. The Phase 1 outline permission set out a parking ratio of 0.6 with the option to reduce to 0.4. In consideration of current London Plan policy, which supports car-free development where possible and a maximum ratio of 0.25 in the Upper Lee Valley Opportunity Area, as well as the delivery of transport infrastructure investments at Meridian Water, including more frequent rail and bus services, it is appropriate that the parking ratio for Phase 1b should be lower:

#### **Parking provision**

	<b>Parking ratio</b>	<b>Units</b>	<b>No. spaces</b>
Phase 1 outline	0.4	725	290
Phase 1a	0.4	300	120
<b>Phase 1b</b>	<b>0.1</b>	<b>676</b>	<b>66</b>
		Difference from Phase 1 outline	-104

- 18.21. It should be noted that trip generation analysis has been undertaken and this indicates that the lower vehicle parking ratio, improved public transport provision and changes to trip patterns arising from greater levels of working from home, mean that the uplift in housing units will have a minor impact (4 additional car trips in the AM peak) on the surrounding strategic and local highway networks.
- 18.22. The Phase 1 outline application included a Controlled Parking Zone (CPZ) secured by S106. The CPZ is being maintained as part of the present application and will be secured via the new Section 106 agreement
- 18.23. 21 residential Blue Badge parking bays and 4 non-residential Blue Badge spaces are being provided, in exceedance of London Plan requirements.
- 18.24. Given the practicalities of delivering such a large scheme and to allow for minor amendments during the delivery of the development, it is recommended that the final details of the vehicle parking provision is secured by condition. A Parking Management Plan is required prior to occupation which sets out details of how spaces will be allocated and should be periodically updated to reflect targets in the Travel Plan.
- 18.25. The level of parking provision is suitable to Phase 1b in its location adjacent to Meridian Water rail station and to the larger Meridian Water site as an urban development that is supported by a sustainable transport strategy.

#### *Electric Vehicle Charging*

- 18.26. An acceptable number of Electric Vehicle charging points is proposed. 10, 8 and 5 active EV spaces are proposed on Plots B, C and D, respectively. 40, 30 and 20 passive EV spaces are proposed on Plots B, C and D, respectively. This is in line with relevant London Plan policies.

### *Delivery and Servicing*

18.27. The applicant has submitted a Deliveries and Servicing Plan (November 2021) which is largely acceptable. It indicates that delivery and servicing trips will not be significant so are unlikely to have an impact on the highway network.

18.28. Officers continue to have concerns with regard to waste store facilities and the ability of waste lorries to be able to safely and efficiently access waste facilities for collections, particularly on Plots B and D. On Plot B, tracking plans show very tight access into and out of the servicing bay, with potential conflicts with the nearby delivery bay, and distance to columns. Similarly, on Plot D, swept path plans indicate very tight manoeuvring required for a waste lorry to enter the ground floor; there are intervening columns and a shared delivery/refuse bay, which should not be shared. The Plot D waste store itself has little space for arranging bins, there are concerns that a collection would take hours to move the bins out and rearrange them. Given the size of the store, it is expected that a number of collections per week would be required. As part of ground flood amendments to address fire safety compliance, the applicant is making further improvements to the currently proposed waste and lorry access arrangements. These changes should accord with the recommendations by officers below. The applicant is making revisions that will be provided by update to Committee members in advance of the meeting.

- The refuse loading bay should be for this purpose only and not shared with any other use as lorries will be unable to service the building if the bay is occupied
- Swept path analyses are needed to demonstrate waste lorries can manoeuvre in and out; columns nearest lorry manoeuvring areas should be reinforced
- Ventilation, adequate lighting and height clearance, not only for access but for lifting the bins
- Bin sizes for various forms of waste: 1100L for refuse, 1280L for recycling and 140L for food waste
- Internal doors leading out to parking and service areas should have visually permeable glazing to avoid doors swinging into vehicles
- Clear responsibility by estate management to ensure waste services can access loading bay, refuse facilities and that residents are informed of responsible waste practices.

18.29. The applicant has also submitted a Site Waste Management Plan that requires revision. On this basis, a condition is recommended requiring a revised Site Waste Management Plan that is consistent with the above-requested information and a new Circular Economy Statement, also sought by condition. This is discussed in more detail in the Sustainability and Climate Change section.

18.30. In addition, it is proposed that there should be a condition requiring submission of an updated Delivery and Servicing Plan. This is also discussed in more detail in Sustainability and Climate Change section.

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

18.31. The Transport Assessment includes a detailed Active Travel Zone assessment which highlights opportunities for improving walking and cycling links to key attractors.



- 18.32. Officers are satisfied that the application proposes low parking provision with a highway network that gives priority to pedestrians and cyclists next to the Meridian Water train station. Strategic Infrastructure Works will continue to reinforce sustainable travel within and to Meridian Water. In all, officers are satisfied that the development positively supports Healthy Streets aims.

*Travel Plan*

- 18.33. A Travel Plan and monitoring fee will be secured via an appropriate planning obligation within the S106 Agreement

*Construction Logistics Plan*

- 18.34. It is recommended that a final version of the Construction Logistics Plan is agreed prior to commencement of development and a condition is recommended to address this.

**19. Sustainability and Climate Change**

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

*Minimising Greenhouse Gas Emissions*

- 19.6. An Energy & Sustainability Strategy for Planning (December 2021, Revision 3) has been prepared by the Applicant which provides an overview of the energy and sustainability strategies for the proposed development. The document demonstrates how the proposal has sought to meet London Plan requirements inclusive of the energy hierarchy and relevant Council policies.
- 19.7. The assessment outlines that the development will achieve a reduction in energy demand through several efficiency measures that include enhanced building fabric U-Values, thermal bridging, enhanced air tightness, mechanical ventilation with heat recovery in residential units, connection to the Lee Valley Heat Network and efficient lighting. These measures will achieve an overall improvement of 11% over Part L 2013, exceeding the London Plan target of 10%.
- 19.8. The applicant submitted an Overheating Report (July 2022). To address cooling and overheating, the assessment sets out a strategy to meet the cooling hierarchy and mitigate overheating risk using:
  - Openable windows
  - Internal blinds (the installation of which is recommended to be conditioned)
  - Mechanical Ventilation Heat Recovery units with matched tempering modules in Plot D
- 19.9. The development proposes to connect to the Enfield District Heat Network operated by Energetik. The assessment indicates that the connection to the DEN achieves a further 59% reduction in site total CO2 emissions.
- 19.10. The proposed development will maximise the amount of PV located on roof spaces of the residential elements.
- 19.11. The proposed development achieves a 71% improvement in CO2 emissions over Part L 2013 through onsite measures and would meet the GLA planning policy target for reduction in regulated CO2 emissions. London Plan Policy SI 2 stipulates that where a zero-carbon target cannot be fully achieved on site, a carbon off-set contribution is required. A carbon off-set contribution will need to be secured through the S106 Agreement.
- 19.12. In order to ensure that the development is net zero-carbon and built in accordance with the submitted energy strategy, conditions are recommended that the development is constructed in accordance with Energy Statement (November 2021) and that prior to the commencement of development, a technical note is submitted confirming how this development will meet the net zero-carbon policy requirement in line with the Energy Statement, and prior to occupation, an Energy verification report confirming that the development has been built in accordance with the details submitted.
- 19.13. The application additionally includes a Whole Life-cycle Carbon Assessment. London Plan Policy SI2 encourages non-referable applications to prepare an assessment and demonstrate how the development will reduce life-cycle emissions. As many measures rely on detailed design, the submitted assessment sets out principles and assumptions for limiting the development's full carbon impact. A condition is recommended that, prior to commencement of development, a technical report is provided that includes detailed targets, measures and evidences how targets will be achieved.

### *Circular Economy*

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

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

The application includes a Detailed Circular Economy Statement (October 2021, Revision 1). The document sets our principles and broad commitments, however, does not include any numerical targets or detailed measures for meeting commitments. A condition is recommended that prior to commencement, a new Circular Economy Statement is provided that details how the scheme will comply with London Plan Policy SI 7. Further, prior to occupation, a report is recommended to be submitted evidencing how the commitments in the revised Circular Economy Statement have been satisfied.

### *Site Waste Management Plan*

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

The application includes a Site Waste Management Plan (November 2021, Revision 2) that broadly sets out construction-stage and operational waste generation, storage and removal. The Site Waste Management Plan should additionally address London Plan Policy SI 7 demonstrating strategies and targets to reduce waste. As above, a condition is recommended that a new Circular Economy Statement is submitted. The Site Waste Management Plan should be consistent in its approach, and reaffirm the measures and metrics in the Circular Economy Statement.

## **20. Environmental health**

### *Air quality and pollution*

- 20.1. Policy SI1 of the London Plan set out the requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.

- 20.2. At a national level, the NPPF recognises that development proposals which directly address transport issues and promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 20.3. Finally, at a local level, policy DMD65 of the Development Management Document requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 20.4. The ES has assessed the likely impacts of the construction and operational phases of the proposed development on local air quality. The dominant source of existing air pollutants (NO<sub>2</sub>, PM<sub>10</sub> and OM<sub>2.5</sub>) would most likely be from vehicle emissions from surrounding roads. The impacts from the development include dust and other particulates from construction activities, traffic generated by construction vehicles, and the operational air quality effects of the completed development which are primarily associated with changes in traffic flows.
- 20.5. Without mitigation the ES concludes that the likely construction phase activities of earthworks, construction and vehicles depositing dust outside of the site could be major and adverse. However, once mitigation is provided the impacts would reduce to an acceptable level. This mitigation would include best practice measures built into the construction methodology and implemented through a Construction Environmental Management Plan (CEMP) and / or Dust Management Plan (DMP).
- 20.6. Within the ES operational traffic from the completed development has been identified as the main potential cause of air quality impact locally. The NO<sub>2</sub> concentrations are predicted to be well below the national air quality objective, with the impacts categorised as 'Minor Adverse' at all receptors. For PM<sub>10</sub> and PM<sub>2.5</sub> the predicted impacts have been classified as 'Negligible' at all receptors. Combining the impacts the overall operational impact on air quality has been classified as 'Negligible' at all receptors, and so no specific mitigation has been identified as being necessary.
- 20.7. In response to the ES the Council's Environmental Health Officer has recommended a condition seeking a Construction Environmental Management Plan, and it is suggested that this incorporates the management of dust with reference to the Mayor of London's Supplementary Planning Guidance on *Control of Dust and Emissions During Construction and Demolition*. As Enfield is a Low Emission Zone for non-road mobile machinery a condition would require Non-Road Mobile Machinery (NRMM) to comply with GLA guidance.
- 20.8. Further, a condition is recommended requiring that an investigation and assessment of the extent of contamination is submitted to officers for consideration.

#### Noise

- 20.9. Chapter 9 of the ES considers noise and vibration. Vibration would be limited to piling at the construction stage, with the recommendation that rotary bored piling offers a better vibration and noise performance. Otherwise vibration is not anticipated to be an issue. The Council's Environmental Health Officer has recommended a condition requiring details of impact piling.

- 20.10. There would be noise caused by traffic during both the construction and operational period. The ES identifies that construction noise and vibration (including road traffic) can be suitably controlled through an appropriate CEMP and adherence to best practices. This would ensure that any impacts are negligible. Operational traffic would generate noise levels that would be negligible.

#### *Wind and microclimate*

- 20.11. The applicant has submitted a technical report into the wind microclimate impacts of the proposed development. The wind microclimate can be affected by terrain, buildings and other obstructions. The report combines pedestrian level wind speeds measured experimentally at key areas within and around the site, with long-term wind frequency statistics transposed from the nearest suitable weather station to determine the probability of local wind speeds exceeding comfort and safety thresholds for a range of common pedestrian activities. Wind tunnel tests were used to compute the aerodynamic effect for two scenarios. Scenario 1 is the proposed development within the existing surrounds and Phase 1A of the Meridian Water regeneration. Scenario 2 adds to Scenario 1 by also including any consented schemes in the area. The criteria used to assess the development are based around pedestrian comfort, using the Lawson Criteria (as adapted by the London Docklands Development Corporation). They describe the suitability of specific activities to a threshold of wind speed and frequency.
- 20.12. The results for both Scenario 1 and Scenario 2 show that wind conditions at street level are safe for public use. Within the development itself wind conditions are generally suitable for their intended use. There are 4 discrepancies. One would be a safety breach to one of the balconies, and the other discrepancies are where the wind conditions are potentially not ideal for other balconies. However, this is relatively low with the vast majority of the development meets the criteria.
- 20.13. The report then identifies potential wind mitigation measures for the proposed development. This includes landscaping at street level and within the podium, and recessed entrances at ground floor. It also includes parapets, screens and balustrades. With this mitigation the discrepancies identified above are eliminated: the potential safety breach is removed and the wind conditions become suitable for their intended use.
- 20.14. Overall, the assessment is considered acceptable and the impacts of the development in terms of microclimate are deemed to be acceptable.

### **21. Flood Risk and Drainage**

- 21.1. London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.
- 21.2. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for major development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage

Strategies and maximising the use of Sustainable Urban Drainage Systems (SuDS).

- 21.3. The Site falls mostly within Flood Zones 1 and 2, where there is a low and medium risk of flooding with a small area at the north of the site, nearest Pymmes Brook, in Flood Zone 3.
- 21.4. With respect to flood risk, the applicant has prepared flood models and Flood Risk Assessments (FRAs) which assessed possible sources of flood risk in respect of London Plan Policy SI12 and SI13. The Environment Agency (EA) found the flood models to be “not fit for purpose” and, for this reason, have objected to the application, citing that the Flood Risk Assessment provided in May 2022 is unacceptable, the applicant has not sufficiently addressed issues of contaminated land and the applicant has not demonstrated an acceptable naturalisation of Pymmes Brook. The EA acknowledges that the applicant has since suitably addressed the matter of contaminated land and has removed this objection, although conditions related to contamination are expected to be recommended.
- 21.5. The most recent flood model (submitted August 2022) accounts for the conditions on the site pre-development, that is, absent any of the proposed development. The EA has accepted this model. Further models have been issued to the EA on 5 September, including one that includes the development and some elements of naturalisation to the Pymmes Brook, including mid-channel wall removal and lowering of the southern bank wall and associated mitigation; the other adds further naturalisation features such as gravels on the watercourse bed, shelves along the bank and planting. The EA has completed review of the models that are most pertinent to the proposal and has identified several “Amber” issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order to be able to accept the flood models. The applicant also submitted a Flood Risk Assessment (FRA) on the 5 September for review by the EA and LLFA. The EA and LLFA have raised initial comments and points of clarification for the applicant, and are liaising closely with the applicant’s hydrology consultants. Again, the EA expressed confidence that the remaining issues can be resolved by the applicant in order to enable the EA and LLFA to recommend conditional approval. If the EA and LLFA accept the FRA, it is likely that conditions will be recommended, including a condition for further detail of the naturalisation works, and any associated updates to the model and FRA. Officers will provide an update in advance of the meeting of the Planning Committee.
- 21.6. The most recent SuDS Strategy for Meridian Water Phase 1B can be delivered in compliance with DMD Policy 61. The proposed discharge rate is greenfield runoff rate for up to the 1 in 10 year event, thereafter unrestricted runoff is allowed. This is to ensure that the site is able to discharge runoff during the 1 in 100 year (plus climate change) event to the receiving watercourses (the Pymmes Brook) before the river peaks during that flood event, and therefore should not exacerbate flooding downstream. This approach has been applied to the whole of the Phase 1 boundary, and includes Phase 1A and other development zones within the Phase 1 boundary such as the Meanwhile uses.
- 21.7. Through limiting the discharge rate for up to a 1 in 10 year event it was expected that most of the attenuation required for Phase 1B could be provided in above ground features. However, despite the cumulative attenuation in green roofs, rain gardens and permeable paving, some below ground attenuation is still proposed. This is only acceptable where the below ground storage features are providing supplementary storage to above ground features. It has been demonstrated that

some above ground attenuation, particularly in the South Park, will be activated for lower order storm events, with below ground attenuation tanks only being utilised for larger storm events (such as the 1 in 30 year event). This is an acceptable approach. Through detailed design (secured via planning condition), there may be opportunities to reduce the reliance on below ground attenuation further.

- 21.8. Source control SuDS measures are proposed to be maximised through the extensive use of green roof systems for roof runoff, and rain gardens/tree pits and permeable paving for the hardstanding areas. It is envisaged that all landscaped areas within the public realm will be a SuDS feature (such as a tree pit or a rain garden) but with the flexibility of different planting specifications. A swale is being utilised within the Ecological Corridor, which will also enable better drainage from the station platforms.
- 21.9. A condition is recommended seeking further information on the detailed design, including technical details of the drainage strategy and SuDS features (including how they connect), and a management plan for future maintenance. A further condition would require a Verification Report demonstrating that the approved SuDS measures are fully implemented prior to occupation of the development.

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

### *Socio-economics*

- 22.1. London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-use phases.
- 22.2. Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 22.3. Chapter 10 of the ES provides an assessment of socio-economics and health within a study area around the site (the 'Local Impact Area'), and a wider area including the Boroughs of Enfield and Haringey (the 'Wider Impact Area'). This allows for comparisons to be made with London as a whole, and (for some indicators) nationally.
- 22.4. Within the Local Impact Area, there is a higher proportion of children and young people under the age of 20 when compared to the Wider Impact Area and London as a whole. The same is true for Black and Asian minorities within the Local Impact Area, representing a higher proportion than the Wider Impact Area and London. There are high levels of deprivations within the Local Impact Area, which is similar to the surrounding areas. There is a good amount of provision within the Local Impact Area in terms of social infrastructure.
- 22.5. The ES identifies that the construction phase of the development is expected to result in a moderate beneficial effects in the medium term. The ES also identifies that there is a beneficial impact with regards to housing quality and design, access to education, healthcare services and social infrastructure, access to open space and nature.

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

#### *Health Impact Assessment*

- 22.7. London Plan Policy GG3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to an outlined criteria.
- 22.8. This application is accompanied by a Health Impact Assessment (HIA). The assessment outlines health profile baselines which have informed impacts of the proposed development. The HIA is based on the Healthy Urban Development Unit (HUDU) Rapid HIA Assessment Tool, which is the correct approach. The baseline position has been established in Chapter 10 of the ES in terms of the demographic profile of the local population, provision of social and community infrastructure and socio-economic conditions. This allows for vulnerable or priority groups to be identified. As identified above, there is a higher proportion of children and young people under the age of 20 within the Local Impact Area, which is 31% of the population. This compares to 26% in the Wider Impact Area and 24.7% across London. There is a lower proportion of elderly people in the Local Impact Area (9.4%) compared to the Wider Impact Area (circa 12%). The site is located within an area of deprivation based on the physical and financial accessibility of housing and local services, with a higher proportion of people on low incomes than most areas.
- 22.9. The HUDU Rapid HIA Assessment Tool provides 11 determinants of health:
- Housing design and affordability
  - Access to health and social care services and other social infrastructure
  - Access to open space and nature
  - Air quality, noise and neighbourhood amenity.
  - Accessibility and active travel
  - Crime reduction and community safety
  - Access to healthy food
  - Access to work and training
  - Social cohesion and inclusive design
  - Minimising the use of resources
  - Climate change
- 22.10. Within each, there are a number of criteria against which the proposed development is assessed. Overall, the assessment concludes that the proposed development will generally have a positive impact on the health of the future and local residents. Securing the employment benefits is discussed above. A Construction Management Plan, Construction Logistics Plan and Travel Plan would ensure that air, noise, and dust is managed during the construction phase. During the operational phase of the development the residential, commercial, leisure and medical floorspace proposed, as well as the associated open space will contribute to the wider regeneration of Meridian Water and deliver positive health benefits.
- 22.11. As recommended by policy, the Healthy Streets approach has been utilised to inform the Transport Assessment and shape the manner in which the design development of the scheme has come forward. Landscaping and public realm



improvements that this scheme will deliver, as well as the promotion of more sustainable forms of transport through the introduction of cycle parking to the site, cumulatively, in officers' view, result in benefits to both existing residents of the estate, and future occupiers of homes proposed.

- 22.12. The outcomes set out within the Health Impact Assessment aim to demonstrate that the proposed development has incorporated a number of measures into the design to ensure its impact on health is as positive as possible throughout both the construction and operational phases. Officers agree with the conclusions set out, and for reasons set out within this report, are of the view that the development takes steps to address Policy GG3's outlined criteria.

### **23. Equalities Impact Assessment**

- 23.1. 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.

### **24. S106 Heads of Terms**

- 24.1. The applicant has raised viability challenges associated with delivery of the development in light of rising construction costs and associated market conditions. London Plan Policy H5 requires that major applications following the Fast Track Route of the threshold approach (i.e. delivering 50% affordable housing on public sector land, as proposed for this development) that do not meet all obligations will be required to follow the Viability Tested Route. The schemes are to be assessed at stages, including at least early stage and late stage reviews.
- 24.2. The applicant has recently provided a full viability appraisal, which has been independently reviewed. The appraisal confirms that with the delivery of 50% affordable housing, the scheme is in deficit. Notwithstanding this, the applicant has indicated a willingness to make S106 contributions but has not yet made a complete proposal. An update will be provided on this before the meeting. Accordingly, at this stage the full benefits of the proposal are not presently known. However, the applicant has confirmed that the full Off-Site Open Space Enhancement and Maintenance Contribution (which includes monies towards Suitable Alternative Natural Greenspace mitigations) and Habitats Regulations Strategic Access Management and Monitoring Plan payments will be made in full, as set out in the table in Section 24 of this report.
- 24.3. A Section 106 agreement linked to the existing Phase 1 outline permission sets out obligations to be met for the entirety of the consented Phase 1 development but broken down to reflect the Phases 1A and 1B, were the development to come forward pursuant to the outline planning permission i.e for 725 dwellings and delivering 25% affordable housing across the whole of Phase 1. The obligations relating to Phase 1A ( approved as reserved matters for the first 300 units) are secured and these are identified in the table below (Column 3). Column 4 identifies those obligations that fall to Phase 1b under the existing outline planning permission assuming it provided 425 residential units with 25% affordable housing across Phases 1A and 1B. The last column (Column 5) sets out the obligations that would be sought to support the uplift in residential units and the development proposed through this application, if viability allows.

24.4. Officers will update on the viability position and the agreed Heads of Terms at the meeting.

Heads of Terms	Description	Existing S106 Agreement applicable to Phase 1a (300 units)	Existing S106 Agreement applicable to Phase 1B (425 unit scheme)	This application
Affordable Housing	Overall quantity, tenure and size mix, early stage viability	25%	25% ✓	50% ✓
Transport	Additional bus stops on Leaside Road			✓
	Vehicle management strategy	✓	✓	✓
	Travel Plan	✓	✓	✓
	Travel Plan monitoring	✓	✓	✓
	CPZ	£70,000		
	Car club	✓	✓	✓
	Unrestricted access across the site and to the station			✓
	Sustainable transport	✓	✓	✓
Education	Contribution towards education provision.	£760,500	£1,077,375	✓
Climate change, flooding and environment	Carbon Offset Payment towards the Carbon Offset Fund	If not connected to DEN	If not connected to DEN	✓
	Connection to Energetik district heat network.	✓	✓	✓
	Monitoring ('Be Seen' – GLA Energy Monitoring Portal).			✓
Health	Plot B health space	✓	✓	✓
Public Realm, Public Art and Cultural Facilities	Estate Management Plan	✓	✓	✓
	Space supporting estate management			✓
Employment & Skills	Employment and Skills Strategy	✓	✓	✓
Green Infrastructure, Open Space and Recreation		£620,689.66	£879,310.35	✓
	SAMM contribution			£9,478
	Off-Site Open Space Enhancement and Maintenance Contribution and SANG contributions			£521,379
	On site open space management plan	✓	✓	✓
	Ecological corridor and monitoring reports	✓	✓	✓
Design	Retention of project architect.			✓
	Design monitoring costs.			✓

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

- 25.1. Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 25.2. The amount of MCIL owed is £2,727,294. The amount of Enfield CIL owed is £180,560. 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.

## **26. Conclusion**

- 26.1. The application proposes the delivery of Phase 1b of Meridian Water in a way that further contributes to the borough's housing supply and provides a proportion of 50% of affordable housing across all of Phase 1. The proposal exceeds LBE's adopted affordable housing target of 40% and meets the London Plan's target of 50%.
- 26.2. There is a pressing need for housing, including affordable housing, and Enfield has a challenging 10-year housing delivery target. This application proposes 676 new, high-quality homes of which 218 are affordable. Enfield's inability to meet the housing delivery test has resulted in the borough's inclusion in the "presumption in favour of sustainable development" category and having to take decisions in consideration of the "tilted balance". This means that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF and Development Plan.
- 26.3. The applicant has engaged with the LPA in undertaking extensive pre-application engagement, inclusive of the development being presented to the Enfield Place and Design Quality Panel. The pre-application process involved the applicant considering design options to determine the most appropriate forms of development and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 26.4. The scheme delivers substantial benefits on site for both new residents of Phase 1 as well as surrounding Edmonton communities. The landscaping strategy introduces three new major public open spaces that range from a biodiverse retreat to a civic square to an adaptable open lawn. An ecological corridor links into Pymmes Wood at the north. The streets and public realm are designed to prioritise walking and cycling, and making easy connection to the Meridian Water station. Ground floor spaces are arranged to bring vitality to the development, and a medical space is provided to support a healthy community.
- 26.5. Three areas of consideration remain: flood risk of the proposed development linked to the naturalisation of Pymmes Brook, the viability of the scheme to provide monetary contributions to off site facilities and waste arrangements to allow practicable access and servicing. Further information in respect of these matters will be reported to committee members. While the full assessment of the planning balance must consider these outstanding issues, officers have undertaken rigorous review of the proposal and acknowledge that the application includes public benefit and represents sustainable development as presented.

- 26.6. Subject to further information regarding the outstanding matters, the appropriate mitigations as set out within the recommended condition schedules, and subject to further assessment of obligations to be secured in the Section 106 Agreement, the application is recommended for approval.

# Open Space Areas

Meridian Water has a number of open spaces across the development which sit between buildings, streets and areas not available for development or landscape, namely the PRS and meanwhile plots.

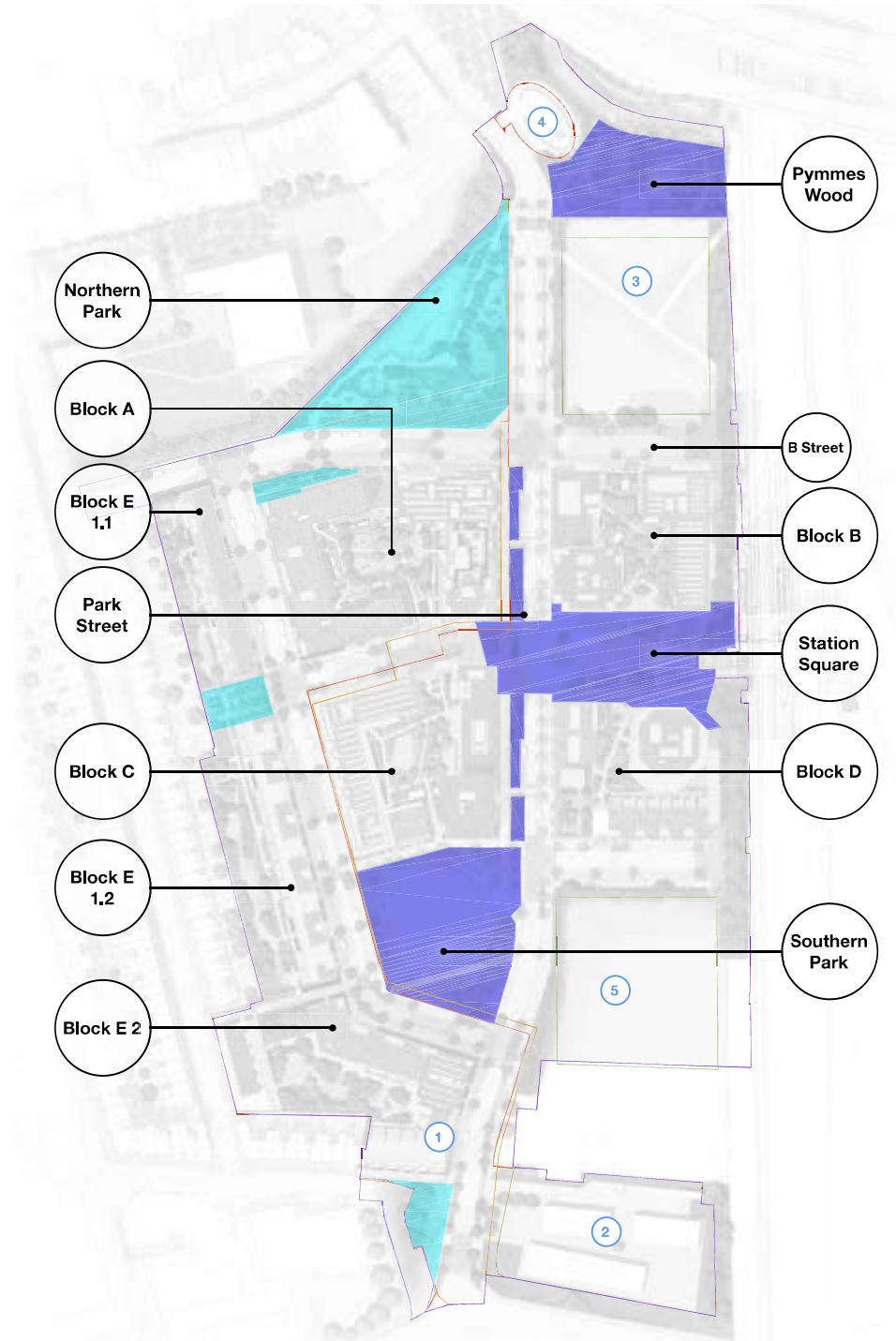
Plan location notes:

1. Phase 1A reserved matters application, consented in 2021
  2. The Meridian Skills Academy, consented 2021
  3. The Northern Meanwhile Plot Community Garden, submitted in 2021
- Further future applications will come forward for:
4. The Pressure Release Station
  5. The central meanwhile plot, whose use is undetermined

The following site areas and POS measurements provide a clear illustration of the quantum of open space public amenity provided as part of the development.

Area	Measurement M <sup>2</sup>
Meridian 1	71335
Phase 1A	27259
Phase 1B	39829
Meanwhile north	3634
Meanwhile central	3810
Meanwhile south	3493
PRS enclosure	532
1B Net	31853
1A POS	4554
1B POS	8344
Total POS	12899

The total area of public open space is 1,29ha

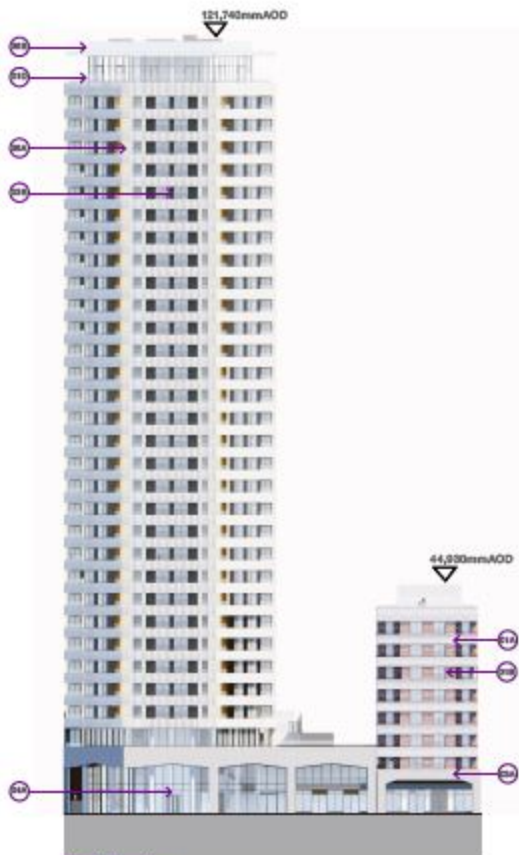


+65,500mm AOD

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North Elevation



West Elevation



## 4. Pymmes Wood Character and Fabric

This concept image shows the composition of meadow, wetland, woodland and naturalised brook and the distribution of habitats.



Lawn areas with meadow edge



Habitat boxes nestled in planted margins



Native wet/damp woodland planting and understory



Footpath surfacing



Habitat features throughout



Floating reed beds







**4 The proposed scheme - Phase 1B proposals**

4.12 Station Square View





**3. Southern Park**  
Southern Aerial View



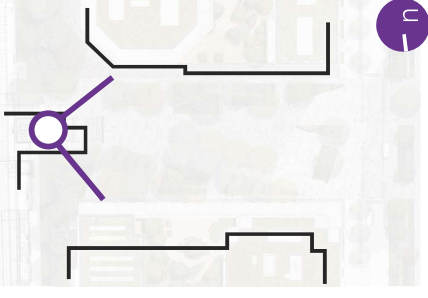


# 1. Station Square

## View from the Steps

When alighting at Meridian Water the station square will be the first experience of the new character and place. The experience is of arriving into an open and flexible but green and soft space with plants, trees, materials and furniture all reflecting the Lea Valley character. The station steps land into a clearing with spaces beneath trees off to the sides. Clear stem trees allow views to the B and D ground floors and across the square

1. Clearing at base of steps
2. Seating space and clear route to block D main entrance
3. Informal seating and programmable space
4. Wild planting and swale feature connecting to ecological corridor
5. Seating outside Block D
6. Water feature forms focus of view from station steps
7. Clear views out to park street







<b>LONDON BOROUGH OF ENFIELD</b>		
<b>PLANNING COMMITTEE</b>		<b>Date:</b> 28 <sup>th</sup> September 2022
<b>Report of</b> Head of Planning	<b>Contact Officer:</b> Andy Higham Joseph McKee <a href="mailto:joseph.mckee@enfield.gov.uk">joseph.mckee@enfield.gov.uk</a>	<b>Ward:</b> Upper Edmonton
<b>Application Number:</b> 22/00106/FUL		<b>Category:</b> Minor
<b>LOCATION:</b> Meridian Water, Kimberley Way, London, N18		
<b>PROPOSAL:</b> Erection of one residential unit (Use Class C3) arranged across one building at Meridian Water Phase 1.		
<b>Applicant Name &amp; Address:</b> Vistry Partnerships		<b>Agent Name &amp; Address:</b> CBRE, Henrietta House, Henrietta Place, London, W1G0NB
<b>RECOMMENDATION:</b>  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 <b>GRANT</b> 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.		

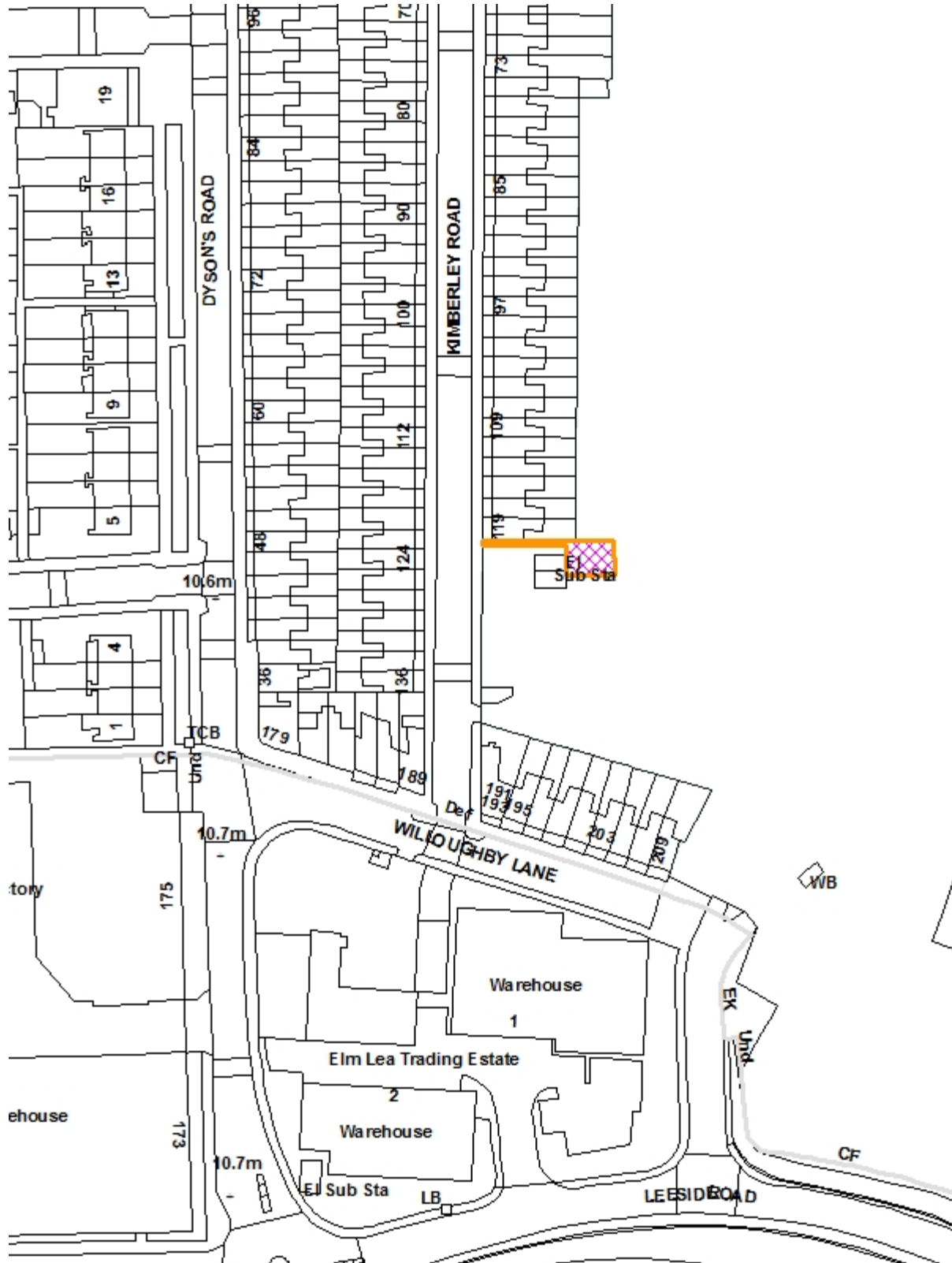
## 1. Note for Members

- 1.1 This planning application affects land where the Council is the landowner. In accordance with the scheme of delegation is reported to Planning Committee for determination.

## 2. Recommendation

- 2.1. That subject to the finalisation 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 to cover the following matters:
1. Time Limit
  2. Approved Drawings
  3. Energy and Overheating Assessment

Ref: 22/00106/FUL LOCATION: Meridian Water, Kimberley Way, London , N18



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Scale 1:1250

North





4. Energy and Overheating Assessment Verification
5. Detailed Design
6. Materials details
7. Planting/Landscaping Plans
8. Removal of Permitted Development Rights
9. Obscure Glazing
10. Flank Elevation Windows
11. Details of means of enclosure
12. Water Consumption
13. Refuse/Recycling Operational Management Plan
14. SuDS/Flood-Risk Verification

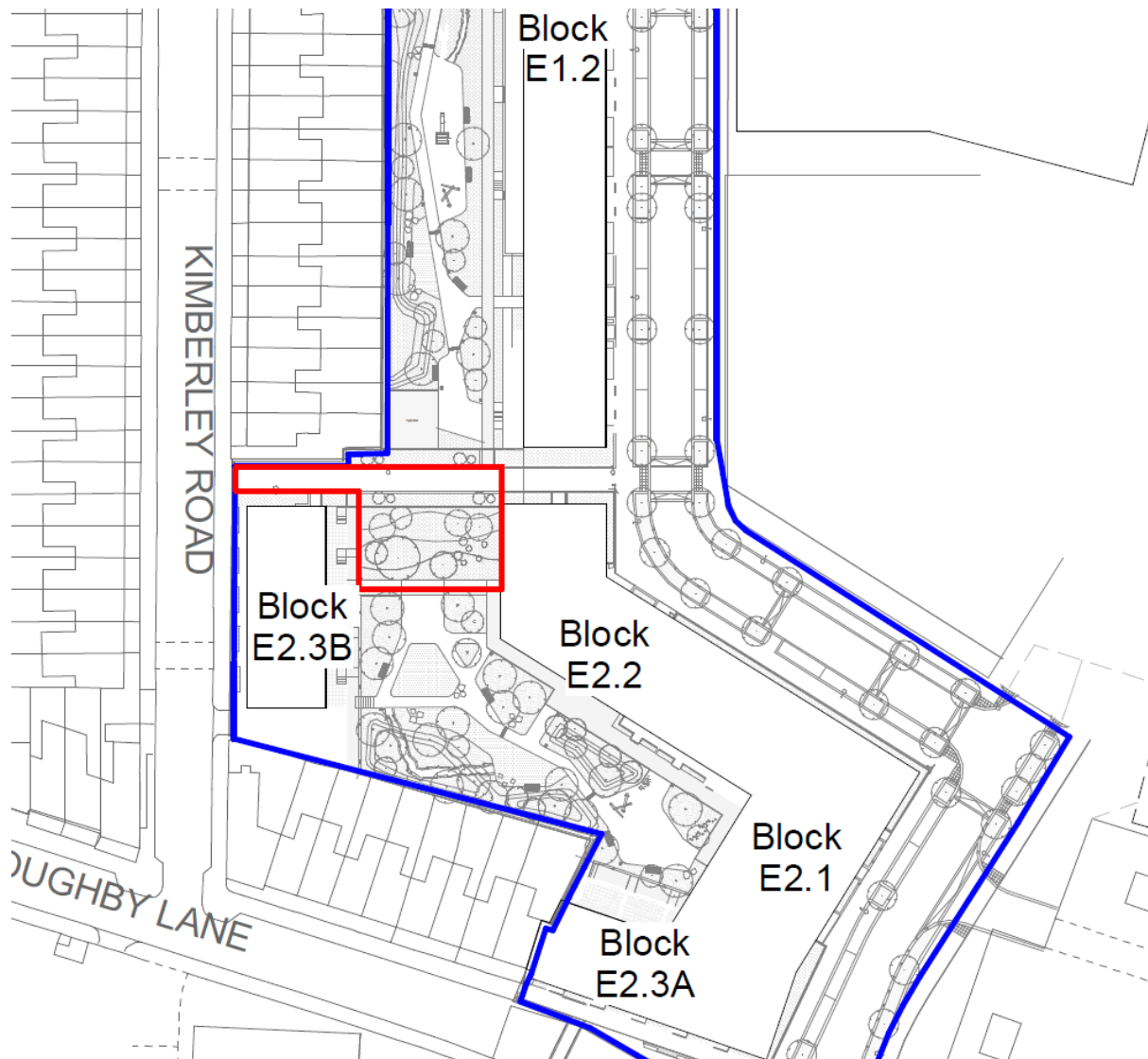
### **3. Executive Summary**

- 3.1. Outline Planning Permission was granted June 2017 for a mixed-use development including delivery of up to 725 new homes. A reserved matters application pursuant to the first phase of development (300 homes),
- 3.2. Phase 1a, was granted planning permission May 2021.
- 3.3. This planning application proposes one additional two storey (3-bed 6-person) dwelling west of Block E2.2 and east of Block E2.3(b), both of which were granted planning permission through the above permissions.
- 3.4. This application delivers an additional affordable family dwelling and this is supported. There are no unacceptably adverse impacts on the amenity of the future occupiers of the consented adjacent blocks neither are there impacts on the amenity of the occupiers of any existing dwelling on Kimberley Road.
- 3.5. The development is to be located on a fringe area of the large communal amenity space between the blocks surrounding the application site; which expands north, rear of the existing dwellings fronting the east side of Kimberley Road. Whilst the proposed development results in a small loss of consented communal amenity space, it does not undermine the overall communal amenity space strategy serving the approved “E-Blocks” secured through the approved applications. The proposed development results in an active frontage to the consented pedestrian link and delivers an additional affordable family unit, which outweighs the small loss of consented communal amenity space.

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

- 4.1. Meridian Water occupies a strategic location within the London – Stanstead – Cambridge growth corridor. Meridian Water lies to the south-east corner of the London Borough of Enfield between Edmonton, Tottenham and Walthamstow. It sits close to the Lee Valley Regional Park and benefits from the River Lee and Pymmes Brook passing through the site. The site has excellent road networks and is bounded by the North Circular Road (A406) and Meridian Way. The new railway station has now been opened at Meridian Water providing access to Central London.
- 4.2. The application site is located south-east of the existing dwellings on Kimberley Road and is north of Willoughby Lane. The Phase 1 site will be split into two phases, Phase 1A and Phase 1B. Phase 1A is located within the western part of the wider site; within which this “drop-in” site is located. The approved plans for Phase 1A include this plot as part of the communal amenity space serving new Blocks E2.2 and E2.3(b). The plot fronts a pedestrian link to be created through

the Phase 1A permission between Kimberley Road and a new road to the east. See below the site as consented:



**5. Proposal**

- 5.1. This application proposes one three-bedroom (six-person) two-storey dwelling fronting a consented pedestrian link which connects Kimberley Road with what will be a newly formed road to the east.
- 5.2. The proposed development benefits from approximately 41sqm of private amenity space, located off its western side elevation as well as approximately 19.5sqm of defensible space forward of its front elevation. A lean-to single storey cycle store is to be located off its eastern side elevation with space for at least 2no. bikes, in front of which is a dedicated refuse storage area. A rear access gate opens up to the consented communal amenity space to the rear.

**6. Relevant Planning Decisions**

- 6.1. 21/04742/FUL - Full planning application for development of Phase 1b of Meridian Water to provide new residential accommodation (Use Class C3), ground floor

commercial floorspace (Use Class E(a, b, c, g)), leisure floorspace (Use Class E(d)) and medical centre (Use Class E(e)) across three buildings including ancillary areas to these uses, roads and footpaths, car and cycle parking provision, public open space including areas for play, landscaping and drainage; and areas of landscaping and open space for temporary and meanwhile uses; Submission of an Environmental Statement – Pending Consideration

- 6.2. 20/03821/RM - Details of Reserved Matters (scale, layout, external appearance and landscaping) for 300 units in respect Plots E and A (Phase 1a) arranged across buildings from 3 to 12 storeys in height pursuant to condition 5 of planning permission 16/01197/RE3 dated 10 July 2017 for development of Phase 1 of Meridian Water comprising up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail (A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground, surface water drainage works, energy centre and associated plant, public open space and children's play areas, and various temporary meantime uses without structures (landscaping and open space). Application includes details pursuant to condition 29 (green procurement plan), condition 63 (biodiverse roof details), condition 65 (Energy statement), condition 86 (wind assessment), condition 71 (cycle parking details) and 73 (car parking details) of the above permission - Granted with Conditions 24.05.2021
- 6.3. 16/01197/RE3 - Development of Phase 1 of Meridian Water comprising up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail (A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground, surface water drainage works, energy centre and associated plant, public open space and children's play areas, and various temporary meantime uses without structures (landscaping and open space). OUTLINE APPLICATION - ACCESS ONLY. An Environmental Statement, including a non-technical summary, also accompanies the planning application in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended by the 2015 Regulations) – Granted with Conditions and S106 Agreement 12.06.2017

## **7. Consultations**

### Public Consultation

- 7.1. Consultation letters notifying local residents of the planning application were sent to 5 properties within the vicinity of the site on 3<sup>rd</sup> February 2022. No consultation responses have been received.
- 7.2. Statutory and Non-Statutory Consultees
- 7.3. Environmental Health:

Environmental Health does not object to the application for planning permission as there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality or contaminated land.

7.4. SuDS Team:

No objection to revised plans. Comments integrated into body of report.

7.5. Traffic and Transportation:

Given that the transport details of the development have been developed via other applications, and that one additional unit will have a limited impact, Traffic and Transportation have no objection to the development. The only observation is that the shared bin and bike store shown should be avoided and an alternative solution should be set out by the applicant.

Officer comment: The applicant has since submitted revised plans which separate out the cycle storage and refuse storage. The amended design resolves the above comments and the revised approach is acceptable.

7.6. Thames Water:

No comment

**8. Relevant Policy**

8.1. National Planning Policy Framework 2021

8.2. Paragraph 11 of the National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development. For decision taking this means:

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

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (7), granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (6); or

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

8.3. Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”

8.4. The Council’s recent housing delivery has been below our increasing housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and more recently being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.

- 8.5. The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the NPPF. It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.6. Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.7. In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 we met 77% of the 2,394 homes target for the three-year period delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target and we now fall into the “presumption in favour of sustainable development” category.
- 8.8. 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 planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 8.9. The London Plan 2021
- GG1 – Building Strong and Inclusive Communities
  - GG2 – Making the Best Use of Land
  - GG3 – Creating a Healthy City
  - GG4 – Delivering the Homes Londoners Need
  - D3 – Optimising Site Capacity through the Design-Led Approach
  - D4 – Delivering Good Design
  - D5 – Inclusive Design
  - D6 – Housing Quality and Standards
  - D7 – Accessible Housing
  - D8 – Public Realm
  - D11 – Safety, Security and Resilience to Emergency
  - D12 – Fire Safety
  - D14 – Noise
  - H4 – Delivering Affordable Housing
  - H10 – Housing Size Mix
  - H6 – Affordable Housing Tenure
  - S4 – Play and Informal Recreation

G1 – Green Infrastructure  
G4 – Open Space  
G6 – Biodiversity and Access to Nature  
G7 – Trees and Woodland  
SI1 – Improving Air Quality  
SI2 – Minimising Greenhouse Gas Emissions  
SI3 – Energy Infrastructure  
SI4 – Managing Heat Risk  
SI5 – Water Infrastructure  
SI7 – Reducing Waste and Supporting the Circular Economy  
SI12 – Flood Risk Management  
SI13 – Sustainable Drainage  
T1 – Strategic Approach to Transport  
T2 – Healthy Streets  
T3 – Transport Capacity, Connectivity and Safeguarding  
T4 – Assessing and Mitigating Transport Impacts  
T5 – Cycling  
T6 – Car Parking  
T6.1 – Residential Parking  
T7 – Deliveries, Servicing and Construction  
T9 – Funding Transport Infrastructure through Planning

8.10. Mayoral Supplementary Guidance

8.11. Sustainable Design and Construction (April 2014)  
The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.

8.12. The Control of Dust and Emissions during Construction and Demolition (July 2014).

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

8.14. Housing (March 2016)  
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.

8.15. Affordable Housing and Viability (August 2017)  
Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.

8.16. Local Plan – Core Strategy

Core Policy 1 – Strategic Growth Areas  
Core Policy 2 – Housing Supply and Locations for New Homes  
Core Policy 3 – Affordable Housing  
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 30 – Maintaining and improving the quality of the built and open environment  
Core Policy 32 – Pollution  
Core Policy 36 – Biodiversity  
Core Policy 38 – Meridian Water

8.17. Local Plan – Development Management Document

DMD6 – Residential Character  
DMD8 – General Standards for New Residential Development  
DMD9 – Amenity Space  
DMD10 – Distancing  
DMD 37 – Achieving High Quality and Design-Led Development  
DMD45 – Parking Standards and Layout  
DMD49 – Sustainable Design and Construction Statements  
DMD50 – Environmental Assessments Method  
DMD51 – Energy Efficiency Standards  
DMD 52 – Decentralised energy networks  
DMD53 – Flow and Zero Carbon Technology  
DMD55 – Use of Roofspace/ Vertical Surfaces  
DMD56 – Heating and Cooling  
DMD57 – Responsible Sourcing of Materials, Waste Minimisation and Green Procurement  
DMD58 – Water Efficiency  
DMD59 – Avoiding and Reducing Flood Risk  
DND60 – Assessing Flood Risk  
DMD61 – Managing surface water  
DMD62 – Flood Control and Mitigation Measures  
DMD64 – Pollution Control and Assessment  
DMD65 – Air Quality  
DMD68 – Noise  
DMD69 – Light Pollution  
DMD71 – Protection and Enhancement of Open Space  
DMD73 – Children’s Play Space  
DMD79 – Ecological Enhancements  
DMD81 – Landscaping

8.18. Edmonton-Leaside Area Action Plan (2020)

EL1: Housing in Meridian Water  
EL8: Managing Flood Risk in Meridian Water  
EL10: Urban Grain at Meridian Water  
EL11: Building Form at Meridian Water  
EL26: The Meridian Water Heat Network

8.19. Other Material Considerations

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

8.20. Enfield Local Plan (Reg 18) 2021

- 8.21. 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.
- 8.22. The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan, while noting that account needs to be taken of emerging policies and draft site proposals.
- 8.23. 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 DE7 – Creating liveable, inclusive and quality public realm
  - Policy DM DE11 – Landscape design
  - Policy DM DE13 – Housing standards and design
  - Policy DM H2 – Affordable housing
  - Policy DM T2 – Making active travel the natural choice
  - Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

## **9. Analysis**

- 9.1. The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 require planning decisions to be taken in accordance with the Development Plan unless material considerations indicate otherwise.
- 9.2. The main issues to consider are as follows:
- Principle of Development
  - House Type and Tenure
  - Design
  - Impact to Residential Amenity
  - Transport, Access and Parking
  - Sustainability and Climate Change
  - Flood Risk and drainage

### ***Principle of Development***

#### Residential Development

- 9.3. Enfield's Authority Monitoring Report 2020/2021 shows that during the preceding 10 years, the Borough had delivered a total of 5,616 homes which equates to approximately 562 homes per annum. Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear



priority, with only 60% of approvals being implemented. . A Local Housing Need Assessment (LHNA)<sup>2</sup> was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.

- 9.4. The Council's Local Plan Issues & Options (Regulation 18) document (2021) acknowledges the sheer scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the emerging London Plan targets for the borough.
- 9.5. The Core Strategy (Core Policy 3) and DMD (Policy DMD1) seek a borough-wide target of 40% affordable housing in new developments, applicable on sites capable of accommodating ten or more dwellings.
- 9.6. London Plan Policy H4 outlines the strategic target of 50% of all new homes delivered across London to be genuinely affordable and outlines specific measures in order to aid achieving this aim. Policy H2 of the New Enfield Local Plan, whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on development sites and that the Council will set a strategic target of 50% of new housing to be affordable.
- 9.7. Core Policies 1 and 2 identify Central Leaside (Meridian Water) as a focus area for housing growth; within the designated opportunity area, further supported by the Edmonton Leaside Area Action Plan.
- 9.8. The application site is recognised within relevant policy as a growth area within the borough appropriate for housing delivery. The principle of the use of this land as residential was established through the outline planning permission in 2017. This application proposes the delivery of 1no. additional residential unit, slotting into the south-western part of the consented Phase 1 development. Both the relevant policy framework and the planning history of the site, allow the principle of this application to be accepted.

#### Loss of Consented Amenity Space

- 9.9. Reserved Matters application (20/03821/RM) approved a set of *general arrangement plans* and these identify the application site as communal amenity space intended to serve the new-build adjacent blocks. The proposed development results in the loss of part of the fringe space fronting the east-west pedestrian connection; east of Kimberly Road. However, there remains a substantial area of communal amenity space to serve these blocks and each unit within the blocks has its own private amenity space, in the form of a terrace or balcony. Given the priority for housing delivery and affordable housing, the small reduction in the quantum of communal space is acceptable.

#### ***House Type and Tenure***

- 9.10. Policy H10 of the London Plan sets out that schemes should generally consist of a range of unit sizes having regard to robust local evidence along with a range of tenures.

- 9.11. Core Policy 5 of the Core Strategy, supported by Policy DMD3 of the Development Management Document, sets out a Boroughwide target for housing mix across the plan period.
- 9.12. The emerging New Enfield Local Plan is based on a more up to date evidence base; the Local Housing Needs Assessment 2020. This has informed emerging Policy H3. The table below is an excerpt from Policy H3, which outlines priority types for different sized units across different tenures:

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

- 9.13. This application proposes a single three-bedroom (six person) affordable rent dwelling, a form of accommodation with the highest priority in the above table and is therefore supported.

### ***Design***

- 9.14. 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 promotes design scrutiny and design standards.
- 9.15. Policy DMD37 of the Development Management Document sets out criteria for 'Achieving High Quality and Design-Led Development' and DMD6 aims to ensure that the scale and form of development is appropriate to the existing pattern of development or setting, having regard to the character typologies and that a high quality of design and standard of accommodation is achieved.
- 9.16. 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.
- 9.17. The design rationale follows that of the wider approved development both regards the wider approved massing strategy and in appearance. *A white smooth brick* is proposed at ground floor level, with a *buff coloured brick* at first-floor level. This is split with a vertical standing soldier course. Patterned brick is proposed below some windows with recessed brick elements at a first-floor level on the side (western elevation). These elements promote a good sense of articulation. *Bronze green PPC metalwork* is utilised for fenestration and Juliet balcony detail. A parapet roof is proposed. The proposed approach to materiality is accepted, nonetheless, to realise a successful scheme of sufficient quality, officers recommend relevant conditions requiring further details of materials.

### ***Fire Safety***

- 9.18. London Plan Policy D 12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion.
- 9.19. The applicant has submitted information related to the access strategy for fire appliances, detailing the nearest location to the dwelling for fire appliances to park; this being on the consented road to the east. Information submitted also sets out the hose distances from this point to different points of the application dwelling; the upper floors being demonstrated to be within the 45m maximum distance, as set out in Section 13 of Requirement B5 of Building Regulations Documents B; *Fire Safety* (2019).
- 9.20. Whilst the development will need to satisfy the relevant Building Regulation requirements; this being is a separate process to the planning process, the information submitted is appropriate and proportionate to what would be expected to be submitted for *minor* development and is acceptable.

#### Residential Design Standards

- 9.21. Table 3.1 (connected to Policy D6) of the London Plan sets out minimum internal space standards for new dwellings. For a 3-bed (6-person) dwelling, the London Plan sets out a minimum space standard of 102sqm for accommodation across two storeys. The proposed dwelling proposes 127.7sqm of internal floorspace, exceeding the minimum requirement. The dwelling has been designed to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'
- 9.22. The proposed development provides triple-aspect accommodation, with outlook north, south and west (at ground-floor level). This is welcomed and in accordance with Policy D6(C).

#### **Impact to Residential Amenity**

- 9.23. London Policy D6 sets out the London Plan criteria to ensure the delivery of new housing of an adequate standard. Policy D7 infers non-major residential development should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Despite the adoption of the New London Plan 2021, the Housing Supplementary Planning Guidance Document (2016) remains an adopted document and a material consideration in decision making.
- 9.24. The adopted Development Management Document contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing).

#### Daylight and Sunlight

- 9.25. Policy D6(D) of the London Plan sets out that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Policy DMD8(c) of the adopted Development Management Document states that development must preserve amenity in terms of daylight, sunlight and outlook; amongst other things. Policy DMD10 prescribes distances between buildings, to prevent any unacceptable overshadowing; to be adhered to unless it can be demonstrated, through daylight/sunlight testing, that there would not be unacceptable impacts.

- 9.26. This application is supported by a Daylight & Sunlight Assessment. This demonstrates a very good standard of accommodation and is acceptable; with most windows/rooms exceeding the relevant BRE test guideline scores; utilising both ADF (Average Daylight Factor) and APSH (Annual Probable Sunlight Hours).
- 9.27. Regards, the impact of the development on relevant neighbouring dwellings, the submitted assessment tests the development's impacts on the following existing and consented dwellings:
- 115, 117 and 119 Kimberley Road;
  - Relevant units/windows within consented Block E2.2; and
  - Relevant units/windows within consented Block E2.3B.
- 9.28. Regards the neighbouring consented development, results do not significantly differ from testing undertaken under the reserved matters application (20/03821/RM). Testing shows there exist a few instances where there are marginal transgressions from BRE targets.
- 9.29. ADF results set out that "W25 of R13" at a first-floor level of consented Block E2.2, fall slightly short of the guideline 1% ADF for a bedroom, being 0.7%. Officers note this window is recessed due to the deck-access arrangements as consented. This is considered a significant factor in these results; rather than wholly a result of the proposed development nonetheless, the results do not differ significantly from BRE Guidelines. The upper part of "W1 of R1"; at a ground floor; orientated westward toward the development, exceeds the recommended 1% target for a bedroom, achieving 2%. Within Block E2.3(B); the consented block of terrace style dwellings west of the application site, these do not differ significantly from results from testing within the reserved matters application.
- 9.30. The submitted testing is acceptable. Impacts to neighbouring existing and consented dwellings, as a direct result of the development, are not significant or unacceptable, taking into account all relevant material considerations. For reasons outlined, the development is compliant with the relevant policy framework.

#### Overlooking

- 9.31. Policy DMD8(c) of the adopted Development Management Document states amongst other things, that development must preserve amenity in terms of privacy and overlooking. As outlined, Policy DMD10 prescribes distances between buildings to be adhered to, unless it can be demonstrated, there would not be unacceptable impacts to privacy.
- 9.32. At a first floor, the proposed placing of bathrooms with obscure glazed windows at the rear (south orientated), adequately ensures no unacceptable levels of overlooking, toward the deck access, as consented within Block E2.2.
- 9.33. Regards impacts to occupiers of consented Block E2.3 fronting Kimberley Road, there are no west-orientated windows proposed at a first-floor level. At ground floor level, west-orientated openings serve the living area of the proposed dwelling. The distance between the proposed west-facing ground floor windows, and the consented eastern rear elevation of Block E2.3(B), falls short of the recommendations of Policy DMD10, and measures approximately 10.5m. However, ground floor openings within the proposed western elevation, lead to a

private amenity space, with a means of enclosure mitigating any overlooking impact. For this reason, and considering the wider site context, the proposed development will not result in any unacceptable impact, and it is recommended a condition require the applicant to provide detail of the means of enclosure, to ensure appropriate products are utilised and robustly safeguard amenity.

### ***Transport, Access and Parking***

- 9.34. 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.
- 9.35. Other key relevant London Plan policies include:
- Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
  - Policy T4 – which calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and
  - Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 9.36. Core Strategy Policies CP24, 25 and 26 aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Policy DMD 45 makes clear that the Council aims to minimise car parking and to promote sustainable transport options. Local Plan NEEAP Policies 4.1, 4.2 and 4.13 encourage modal shift away from car use and seek to improve walking, cycling and bus provision.
- 9.37. The application does not include any additional car parking. The outline planning permission and reserved matters consent agreed a car-parking ratio of 0.4 with the extant S106 Agreement requiring the submission of a car parking management plan to inform allocation and details of parking provision. A new S106 Agreement will be required to tie this application together with obligations secured within the existing S106 Agreement and those arising from the new Full application pending consideration regarding Phase 1B, to ensure obligations contained therein apply to all elements of the scheme, including this application. On this basis, the development would not have any greater impact than the scheme already consented and is considered acceptable.

### **Cycle Parking**

- 9.38. The development proposes a lean-to side addition which is designed to provide cycle parking for at least 2no. spaces; compliant with Table 10.2; supporting Policy T5 of the London Plan.

### **Refuse**

- 9.39. The development provides dedicated refuse storage within the front garden space; fronting the street. The refuse stores would be located in excess of the normal 10m

pull distance to the highway where the refuse vehicle will be able to stop. An area will therefore need to be identified where residents can pull bins to on collection day for operatives to collect. A condition is recommended requiring the submission of details to address this.

### ***Sustainability and Climate Change***

- 9.40. Paragraph 154 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. The London Plan and Enfield (Regulation 18) emerging Local Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.
- 9.41. London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan's requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme's performance.
- 9.42. London Plan Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 9.43. London Plan Policy SI 4 outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy.
- 9.44. NPPF Paragraph 157 outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable
- 9.45. The applicant has not submitted any supporting Energy and Overheating Strategy in support of this application. Whilst this in itself is not a major application; it is a slot in to an existing permission which in itself is 'major development'. To ensure the development addresses the requirements of London Plan Policy SI 2, condition is recommended requiring the applicant to submit a strategy, which sets out the development achieves no less than a 35% improvement in the total CO2 emissions arising from the operation of the development over Part L of Building Regulations and a further condition requiring verification the strategy has been complied with.

### ***Flood Risk and drainage***

- 9.46. 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.
- 9.47. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for all development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage Strategies and maximising the use of Sustainable Urban Drainage Systems (SuDS).
- 9.48. In support of this application, the applicant has submitted a Flood Risk Assessment. The assessment sets out that the finished floor levels comply with data approved within wider Phase 1 Flood Risk Assessment. Whilst the development does not result in the loss of any consented SuDS features, proposed SuDS features are outlined on submitted plans. A condition is recommended that prior to the occupation of the development, the applicant demonstrate compliance with the approved detail.

## **10. S106 Agreement**

This development is intrinsically linked to the outline planning permission and the reserved matters approval for Phase 1A and is reliant on it for the delivery of the road and open space infrastructure to support it. Accordingly, a new legal agreement will be required to tie this application into that permission and its obligations and to ensure this development cannot proceed in isolation. The full planning applications also on this agenda relating to Phase 1B, will also require a new legal agreement and therefore it is expected that a single agreement will be prepared that captures all applications for the totality of the Phase 1 site.

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

- 11.1. The Meridian Water Masterplan area is charged at a nil rate for residential development, therefore the residential floorspace incurs £0 in Enfield CIL. Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure. equating to £7,680. However, the development of social housing is exempt from MCIL if an application for relief is made. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

## **12. Public Sector Equality Duty**

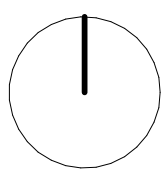
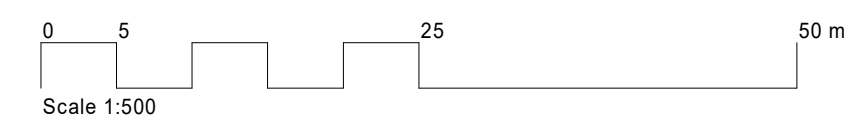
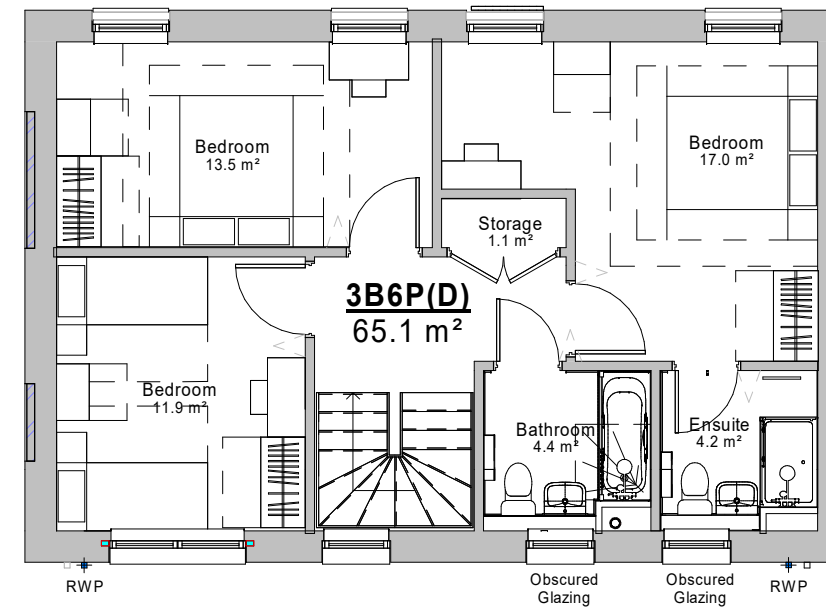
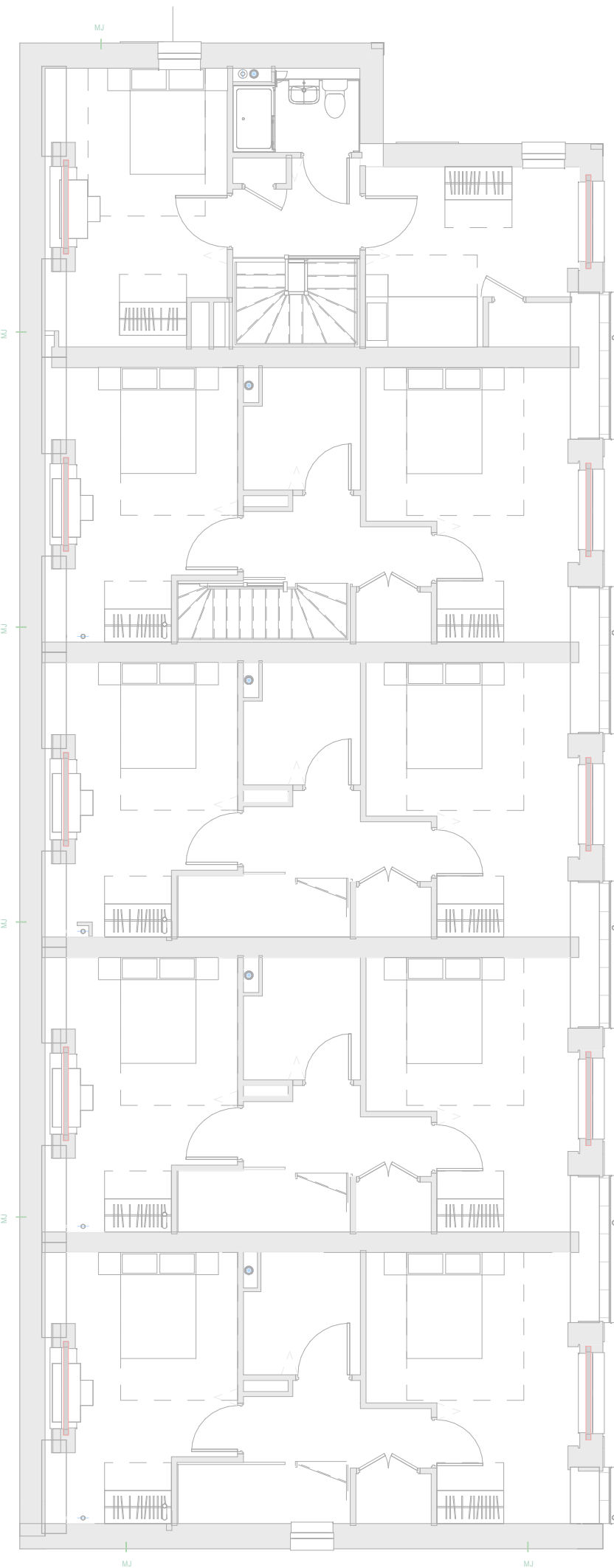
- 12.1 Under the Public Sector Equalities Duty, an equalities impact assessment has been undertaken. It is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

## **13. Conclusion**

- 13.1. The infill development results in the delivery of an additional affordable rent family unit which is supported.

- 13.2. The development is a well-designed family home which provides a good standard of accommodation and is designed to complement the architecture of the wider scheme. It will deliver an active frontage to the consented east-west pedestrian link, improving natural surveillance of this link. Whilst a small area of communal amenity space is lost to the adjacent new build block of flats, this is considered to be outweighed by the benefits of the scheme.
- 13.3. A new S106 Agreement will be required to tie this application to the existing outline permission and reserved matters approval for Phase 1A, together with obligations identified for the Full application pending consideration regarding Phase 1B, to ensure obligations contained therein apply to all elements of the scheme. For reasons outlined, the application is supported.





Rev	Description	Date
P1	Design revised in response to LPA's comments	22/06/21
P2	Drawings updated for Drop-in Application	17/09/21
P3	Issued for Planning Application	19/11/21
P4	E2 Drop-in - Drawings updated in response to Planning Officer's comments.	29/07/22
P5	Drop-in Unit - Drawings reissued for submission to planning.	24/08/22

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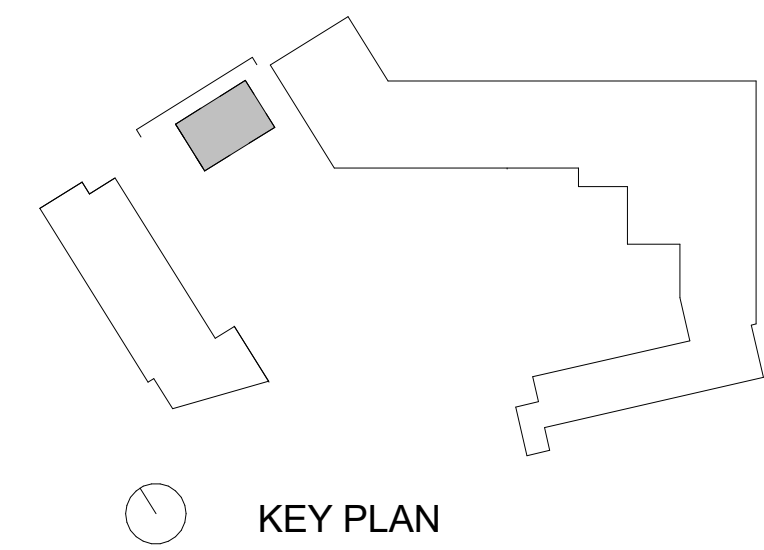
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Scale @ A1 1:100	Date 22/06/21	Job Number GTP-MER	Project Meridian One LB Enfield
Drawn By MWI	Checked By ELS	Status Planning	
Drawing No. LD506-MER-HTA-E2-01-DR-A- 07-2091	Rev P5	Purpose of Issue For Planning	Drawing E2 Drop-In Application Level 01

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Rev	Description	Date
P1	Design revised in response to LPA's comments	22/06/21
P2	E2 Drop-in - Drawings updated in response to Planning Officer's comments.	29/07/22
P3	Drop-in Unit - Drawings reissued for submission to planning.	24/08/22

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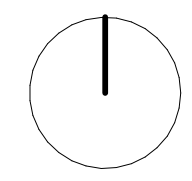
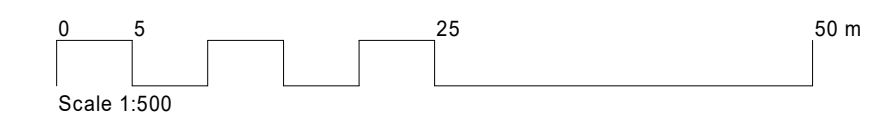
Scale @ A1 1:100	Date 22/06/21	Job Number GTP-MER	Project Meridian One LB Enfield
Drawn By MWI	Checked By ELS	Status Planning	
Drawing No. LD506-MER-HTA-E2-ZZ-DR-A- 08-2190	Rev P3	Purpose of Issue For Planning	Drawing E2 Drop-In Application North Elevation

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Rev	Description	Date
P1	Design revised in response to LPA's comments	22/06/21
P2	Drawings updated for Drop-in Application	17/09/21
P3	Issued for Planning Application	19/11/21
P4	E2 Drop-in - Drawings updated in response to Planning Officer's comments.	29/07/22
P5	Drop-in Unit - Drawings reissued for submission to planning.	24/08/22

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Scale @ A1 1:100	Date 22/06/21	Job Number GTP-MER	Project Meridian One LB Enfield	 
Drawn By MWI	Checked By ELS	Status Planning		
Drawing No. LD506-MER-HTA-E2-GF-DR-A- 07-2090	Rev P5	Purpose of Issue For Planning	Drawing E2 Drop-In Application Level 00	HTA Design LLP <a href="http://www.hta.co.uk">www.hta.co.uk</a> London   Edinburgh   Manchester   Bristol

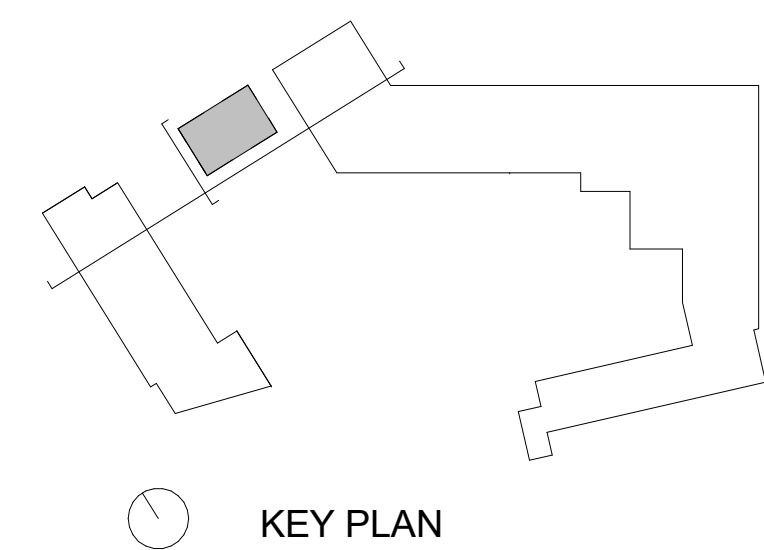




1 Drop In - Elevation 2a  
1 : 100



2 Drop In - Elevation 3  
1 : 100



KEY PLAN

Rev	Description	Date
P1	Design revised in response to LPA's comments	22/06/21
P2	E2 Drop-in - Drawings updated in response to Planning Officer's comments.	29/07/22
P3	Drop-in Unit - Drawings reissued for submission to planning.	24/08/22

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Scale @ A1 1:100	Date 22/06/21	Job Number GTP-MER	Project Meridian One LB Enfield
Drawn By MWI	Checked By ELS	Status Planning	
Drawing No. LD506-MER-HTA-E2-ZZ-DR-A- 08-2191	Rev P3	Purpose of Issue For Planning	Drawing E2 Drop-In Application South and West Elevation

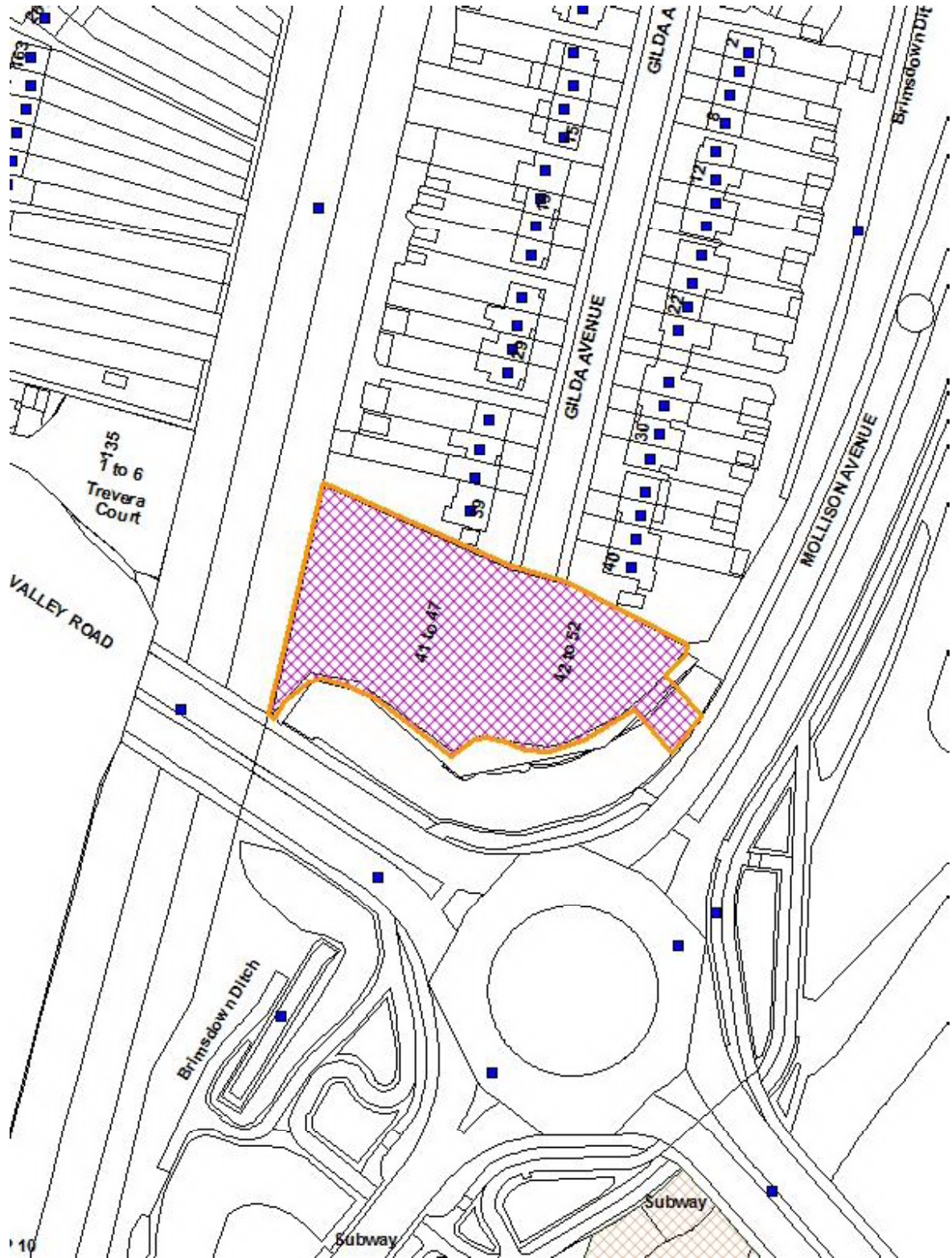



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**LONDON BOROUGH OF ENFIELD****PLANNING COMMITTEE****Date:** 28<sup>th</sup> September 2022**Report of**  
Head of Planning**Contact Officer:**  
Andy Higham  
Allison De Marco**Ward:**  
Ponders End**Ref:** 20/01815/FUL**Category:** Full Planning Application**LOCATION:** 41-52 Gilda Avenue, Enfield, EN3 7UJ**PROPOSAL:** Demolition of the existing buildings to provide three buildings comprising residential dwellings (Class C3) associated landscaping, car parking and amenity space.**Applicant Name & Address:**  
Origin Housing Developments Ltd**Agent Name & Address:**  
RPS Group  
20 Farringdon Street  
7th Floor  
London  
United Kingdom  
EC4A 4EN  
[k.jones@rpsgroup.com](mailto:k.jones@rpsgroup.com)**RECOMMENDATION:**

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

Ref: 20/01815/FUL LOCATION: 41-52 Gilda Avenue, Enfield, EN3 7UJ,



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North



## 1 Note for Members

- 1.1 This planning application is brought to Planning Committee on account of the development categorised as a “major” development, meeting the exception criteria (1), “detailed applications for the erection of 10 or more residential units”. In accordance with the scheme of delegation, is reported to Planning Committee for determination.

## 2 Recommendation

- 2.1 That subject to the completion of a S106 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.
1. Time limit
  2. Accordance with plans
  3. External Appearance (sample materials including glazing specification)
  4. Terraces – design
  5. Finished floor levels
  6. Biodiversity Enhancements
  7. Landscape (compliance)
  8. Lighting Plan
  9. Arboricultural Method Statement with Tree Protection Plan
  10. Nesting season
  11. Drainage Strategy
  12. Drainage verification report
  13. Low carbon technology
  14. Minimum 35% Carbon improvement
  15. Energy certificate
  16. Detail of development – Refuse storage
  17. Construction Site Waste Management
  18. Cycling storage
  19. Car parking
  20. Electric charging points
  21. Construction Management Plan
  22. Highway details
  23. Highway dedication
  24. Construction Noise
  25. Construction Management Plan, including dust control measures
  26. Impact piling (no impact piling without prior written approval), borehole management, flood risk permit
  27. Written scheme of investigation
  28. Water
  29. Rooftop plant (restriction) and details of extract ducts and fans
  30. Part M units
  31. Fibre connectivity infrastructure
  32. Secure by Design
  33. No plant equipment to be fixed to external face of building
  34. Contamination (unexpected)
  35. No loading
  36. Security
  37. Parking design
  38. Privacy screens
  39. Noise insulation report (see noise – standard of accommodation)
  40. Naturalisation feasibility

Informative

1 Section 278 to be undertaken prior to development

- 2.2 That the Head of Development Management be granted delegated authority to agree the final wording of the conditions and the s106 Agreement to cover the matters in the Recommendation section of this report

**3. Executive Summary**

- 3.1 The report provides an assessment of the proposed scheme involving the redevelopment of the site involving the construction of 49 x high-quality new homes, replacing 10 x existing units on site. The proposals would represent an uplift of on-site affordable housing, with 49% of the proposed new homes offered as Affordable Housing.
- 3.2 The existing development on site comprises 2 x two-storey residential (Class C3) masonry buildings accommodating a total of 10 x residential units. The most easterly of the existing buildings accommodates 6 x two-bedroom units (42-52 Gilda Avenue); the most westerly building accommodates 4 x five-bedrooms units (41-47 Gilda Avenue).
- 3.3 The existing residential units are owned and managed by Origin Housing under the Enfield Single Housing scheme. The existing units are laid out as traditional C3 units and classified as C3 units. The existing unit layouts include kitchens and bathrooms. However, the existing units do not have access to private amenity space. Existing occupants have access to an area of open communal space surrounding the two existing buildings and existing parking spaces.
- 3.4 The proposed development comprises a total of 49 x new homes, with 24 x new homes (49%) offered as Affordable Housing. The 24 x affordable homes are offered as: 17 x London Affordable Rent (LAR) and 7 x Shared Ownership, classed as an intermediate affordable housing product. This represents a ratio of 71% genuinely Affordable Rent (LAR) and 29% intermediate. The provision of 49% of the total forty-nine (49) units as affordable housing on site representing 24 units, is a significant public benefit. The remaining homes in the proposal (25 x are private sale).
- 3.5 The proposals have been subject to extensive discussion with Council Officers. The scheme has been subject to amendments during pre and post-submission negotiations, including a reduction in maximum height. The proposals comprise a part 8 storey Block (A) and part 5 storey Block (B) and a part 3 storey Block (C) residential building (Class C3) to provide forty-nine (49) new flats with dedicated onsite car parking for twenty-nine spaces (29).
- 3.6 The current accommodation is dated and would benefit from enhanced re-development to better optimise use of the site. The proposed development is assessed as providing a high standard of residential amenity, with private external space and generous play space for families.
- 3.7 The proposed dwelling mix has been based on an assessment of affordable housing considerations, including detailed consideration of the Council's Local Housing Needs Assessment (2020), planning policy, policy weight, case law, Applicant justification and advice from the Council's Housing Officers. The site and



development represent an opportunity for both starter homes and downsizing within the borough and the releasing of family housing.

- 3.8 The development offers opportunities for biodiversity and landscape enhancements and to make greater utilisation of the Brimsdown ditch (main river).
- 3.9 Officers have assessed and concluded that the proposed parking provision would be enough to meet the potential demand and help address existing and future parking pressure in the area. Subject to conditions and obligations, the proposed development would not result in conditions prejudicial to the safety and free flow of traffic in the surrounding area.
- 3.10 The application is supported by appropriate and satisfactory technical reports covering the effect of the proposed development on parking, servicing, biodiversity and impacts to neighbouring amenity. The impacts of the development are considered within acceptable thresholds to meet policy compliance expectations.
- 3.11 The planning application satisfies overarching planning policy aims to increase the housing stock of the borough and considered to be acceptable subject to pre-commencement and pre-occupation planning conditions and a signed S106 legal Agreement.
- 3.12 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, including provision of 49% Affordable Housing.
- 3.13 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 significant weight in favour of the proposed development.
- 3.14 It is acknowledged and recognised throughout this report, that consideration of this proposal has involved finely balanced judgements. A balanced consideration of compromises is detailed in the report. The proposal represents a clear scale shift within Gilda Avenue, with some impacts on heritage and neighbouring amenity. These matters have been considered in detail below, and weighed against the primary public benefits of the scheme which 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 meaningful biodiversity enhancements and play spaces).

#### 4. Site and surroundings

- 4.1 The Application Site is located to the south of Lea Valley road (A110), the railway line is to the west on a north to south axis. To the east is Mollison Avenue and Gilda Avenue is located to the north. The site is surrounded by residential to the north, comprising semi-detached and terrace 2 storey residential houses.
- 4.2 To the west lies the railway line and heavy commercial are located to the east. To the east, beyond Mollison Avenue lies the Ponders End Industrial Site beyond which is the King's George's Reservoir. There are no heritage assets within the site boundary or immediately adjacent to the site although a number of designated and non-designated heritage assets have been identified within a 1km radius. The site has no land use designations. The Metropolitan Green Belt is located, to the east. The topographical characteristics and existing industrial development to the east of the Application Site are relevant. As set out, ground level within the Application Site is substantially lower than the surrounding highways infrastructure to the south and east – which serve to spatially and physically sever the Application Site from the Conservation Area, Green Belt and broader context.
- 4.3 The site is currently occupied by a group of two storey brick buildings which are broadly aligned with the residential buildings along Gilda Avenue. The rest of the site is occupied by a turning/parking area at the end of Gilda Avenue, a parking area to the West of the site and larger areas of turf around the buildings. The site is generally flat matching the levels of Gilda Avenue itself but beyond the site there is a significant variation in heights with a banked landscape zone up to the roads known as Mollison Avenue and Lea Valley road. The height difference between the site and these roads varies between 7 and 3 metres.
- 4.4 The Application Site is located within proximity of Ponders End station, being approximately 10-12 minutes' walk from the station. Existing bus stops on Nags Head Road and the Application site are located between a 4.5- and 7.5-minute walk from the Application Site. There are also bus stops served by the 491 in closer proximity. The area around Ponders End station, which includes the Application Site, have an existing PTAL (public transport accessibility level) level of 2 (base year). The walking distance from Ponder End Station to the Application Site is around 0.5 miles / 804 m. The site is located within a radial distance of 800m of Ponder End Station.
- 4.5 The site is located within Flood Zone 1 – meaning the site has a low probability of flooding from rivers and sea. It is not subject to flood risk nor any historic land contamination. The Brimsdown Ditch runs along the southeast of the site. Whilst the Brimsdown ditch is classified as a 'Main River', it is in effect a culvert, as it is enclosed by steep concrete banks, and is inaccessible to the public by virtue of the fencing and extensive unmanaged greenery surrounding it.
- 4.6 The Application Site is bounded by a band of trees along its southern boundary with the roundabout where the two key routes meet. The sloped bank between site and road to the south and east is densely planted with existing trees. Ponders End Flour Mills Conservation Area (designated in February 2015) is located to the south, across Lea Valley Road.

## **5. Proposal**

- 5.1 The proposed development would introduce 3 x Blocks in total: 2 x Blocks (A and B) with larger footprints and one small footprint block, at Block C which accommodates a 3-storey townhouse. Block A would be eight storeys tall with a 3-storey segment (Block C). Block B would project to a height of five storeys. The development would provide 49 residential units. Blocks A would contain 34 units and Block B would contain 14 units. The 3-storey segment adjoining Block A would house a dwelling house unit.
- 5.2 The units would be divided in the following unit mix 18 x one-bed units (37% by unit or 27% by habitable room), 26 x two-bed units (53% by unit or 58% by habitable room); and 5 x three-bed units (10% by unit or 15% by habitable room).
- 5.3 The Application Site currently accommodates, what the Applicant describes as, outdated low-quality residential units (Class C3). As noted below, the site is currently occupied by two buildings forming 42-52 Gilda Avenue, consisting of six two-bedroom units and the western building 41-47 Gilda Avenue, consists of four five-bedroom units.
- 5.4 The existing units are owned and managed by Origin Housing. The existing buildings are in a poor state of repair. The Applicant has discussed and agreed the proposed residential mix with Enfield's housing team, so that the proposed development can respond to the needs of existing residents (on site). A Nominations Agreement is in place with Enfield Council, and all family sized accommodation will be advertised with Enfield on its CBL (Choice-Based Lettings) platform, with all referrals from Enfield Council. Origin Housing proposes to manage the decanting process for existing residents. The existing residents will be relocated to alternative housing within the borough of Enfield, with the Nominations Agreement to be agreed in detail in respect of cascading preference over relocating existing residents within the proposed development. The Housing Team support the proposals.
- 5.5 The development provides attractive and well-maintained communal gardens to the south-west corner of the proposed residential blocks, providing generous play space family and the opportunity for improving the biodiversity value on site. The proposed development includes ground level car parking with 29 spaces (inclusive of 5 disabled spaces) assigned to the future occupiers of the site. The site is accessed by the existing adopted highway of Gilda Avenue and a generous turning head is provided.

## 6. Relevant Planning History

- 6.1 Reference – TP/77/0932  
Description – 10 Flats  
Decision – Granted 15/11/1977
- 6.2 Pre-application advice was provided in 2018 and 2019 to assist in developing the current scheme
- 6.3 Reference 18/03942/PREAPP  
Description of pre-app - Proposed redevelopment of site and erection of 58 residential units.
- 6.4 Reference 19/00947/PREAPP  
Description of Pre-app - Proposed redevelopment of site and erection of 56 residential units (FOLLOW UP TO 18/03942/PREAPP).

## 7. Consultation

### Statutory and Non-Statutory Consultees

#### *Urban Design*

- 7.1 Urban Design Officers have stated that they broadly support the proposal. Minor design development / amendments have been recommended.

*Officer response: Officers have addressed those points where Urban Design Officers have requested amendments at Section 9 of the report.*

#### *Education*

- 7.2 No response was received.

*Officer response: As set out at Section 9, Officers recommend that a contribution of £122,500 be secured by way of s106 obligation. The contribution would be secured for the purposes of mitigating the impact of the Development on educational services and for the provision of additional educational facilities and school places in the Borough, especially targeting specialist school places.*

#### *Housing*

- 7.3 The Housing Team support the proposals. While the higher proportion of smaller homes is acknowledged (1-beds), this is because the Applicant needs to re-provide for existing single tenants. The Housing Team is eager to encourage and increase the number of Registered Providers developing in the Borough. Increased RP provision is welcomed.

*Officer response: Housing need and affordability is considered in greater detail at Section 9.*

#### *Environmental Health*

- 7.4 Environmental Health do not object to the application for planning permission as there is unlikely to be a negative environmental impact. EHO Officers have concluded that there are no concerns regarding air quality, noise or contaminated land. A contamination report has been submitted which concluded that there are no concerns with land contamination due to historical sources. Conditions are recommended.

*Officer response: Conditions have been recommended in response to EHO Officer recommendations.*

*Transportation*

- 7.5 Transportation & Transport – comments are incorporated in the main body of the report (Section 9).

*Officer response: As set out at Section 9, Officers recommend that a contribution of up to £22,391 be secured towards sustainable transport infrastructure with an additional up to £15,415 to be secured towards Cycle Enfield and an additional up to £15,000 be secured and directed towards feasibility consideration of a car club spot within 10minutes walk of the site.*

*Heritage*

- 7.6 Conservation Officer comments have been considered and are incorporated into the heritage analysis at Section 9 of the report.

*Trees*

- 7.7 No objections to the development subject to compliance with the submitted arboricultural report and landscape plans.

*Officer response: As set out at Section 9, Officers recommend conditions to ensure compliance with the submitted arboricultural report and landscape plans.*

*LLFA, Sustainable Drainage*

- 7.8 LLFA Officers do not object to the application for planning permission. While LLFA Officers have stated a strong preference for the naturalisation of Brimsdown Ditch, the circumstances of the application are acknowledged, and Officers do not object to the proposed development.

*Officer response: As set out at Section 9, conditions are recommended, including a feasibility study to consider naturalisation of Brimsdown Ditch - which is located outside the red line boundary and ownership of the Application. Further comments are incorporated in the main body of the report (Section 9).*

*Sustainability*

- 7.9 Comments are incorporated in the main body of the report (Section 9)

*Ecology (Council appointed specialist consultant)*

- 7.10 Supportive subject to conditions, comments are incorporated in the main body of the report (Section 9).

External Consultees

*Thames Water*

- 7.11 Thames Water have confirmed subject to adherence to the sequential approach to the disposal of surface water we would have no objection. On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, there are no objections.

*Designing Out Crime (Met Police)*

- 7.12 The design has not provided upfront information relating to access control gates, securing of bin storage and external lighting. If the council is minded to approve,

secured by Design condition should be applied, we request the completion of the relevant Secured by Design application forms at the earliest opportunity.

*Network Rail*

- 7.13 The developer must ensure that their proposal, both during construction and after completion does not: encroach onto Network Rail land affect the safety, operation or integrity of the company's railway and its infrastructure undermine its support zone damage the company's infrastructure place additional load on cuttings adversely affect any railway land or structure over-sail or encroach upon the air-space of any Network Rail land cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

*Environment Agency*

- 7.14 No objection to the proposed development subject to conditions pertaining to pilling into the London Clay, Borehole management condition and obtaining an approved Flood risk permit.

*Historic England - GLAAS*

- 7.15 Limited nearby archaeological evidence has been found on site but a suggested condition that a written scheme (WSI) be provided prior to demolition.

*Canal and Rivers trust*

- 7.16 This application falls outside the notified area for its application scale. We are therefore returning this application to you as there is no requirement for you to consult us in our capacity as a Statutory Consultee.

Public Response

- 7.17 Two rounds of neighbouring consultation letters have been sent out during the assessment of the planning application. In each of the two rounds, on the 18/08/2020 and 08/04/2022, 258 neighbouring properties were sent letters.

- 7.18 A site notice was also displayed on Gilda Avenue on the 4<sup>th</sup> of September 2020. The development was also advertised in the Enfield Independent on the 02/09/2020.

- 7.19 At the time of writing,

**Round 1**

- Four (4) objections received in round 1.

**Round 2**

- Four (4) objections received in round 2
- One (1) letter of support was received in round 2

- 7.20 The concerns have been summarised below,

- Affect local ecology
- Close to adjoining properties
- Development too high
- Inadequate parking provision
- Increase in traffic
- Increase of pollution
- Information missing from plans



- Loss of light
- Loss of parking
- Loss of privacy
- More open space needed on development
- Noise nuisance
- Strain on existing community facilities
- Noise nuisance
- Out of keeping with character of area

Officer response to comments

- 7.21 The material planning concerns within the objection letters have been considered by officers during the assessment of the planning application. Officers visited the site several times to make assessment of the highlighted concerns. Character, massing and transport are concerns raised on several occasions from objectors. The concerns raised during consultation are addressed and assessed in the body of the report under the relevant material sections.
- 7.22 The development shall be subject to a range of pre-commencement planning conditions and a s106 legal Agreement.

**8. Relevant Policy**

*National Planning Policy Framework 2021*

- 8.1 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 8.2 The NPPF recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

- 8.3 In relation to achieving appropriate densities paragraph 124 of the NPPF (2021) notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
  - b) local market conditions and viability;
  - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
  - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
  - e) the importance of securing well-designed, attractive and healthy places.
- 8.4 The NPPF (2021) 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.
- 8.5 Footnote (8) 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.*”
- 8.6 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.
- 8.7 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 5-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 the Enfield is one of 51 Councils which have achieved below 75 per cent against the Housing Delivery Tests – and subject to the Housing Delivery Tests most severe government sanction, the National Planning Policy Framework's (NPPF's) presumption in favour of sustainable development.
- 8.8 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period. The Council's recent housing delivery has also been below the Council's increasing housing targets.
- 8.9 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.
- 8.10 The sanctions mean that the Council's Local Plan housing policies are considered to be out-of-date. The Council is now vulnerable, including in respect of increased risks relating to housing-led planning appeals – and if and when minded to refuse housing-led planning applications, is advised to carefully consider the implications of Paragraph 11 of the NPPF.
- 8.11 Key relevant policy objectives in NPPF (2021) to the site are referred to below,  
 Section 5 – Delivering a sufficient supply of homes Para 60 - 77.  
 Section 8 – Promoting Healthy and safe communities, Para 92 & 97  
 Section 9 – Promoting sustainable transport, Para 104-113  
 Section 11 – Making effective use of land Para 119 -125  
 Section 12 – Achieving well-designed places, Para 126-136
- Adopted Development Plan
- 8.12 Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions of the development of the development plan so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.
- 8.13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Enfield Core Strategy (2010); the Enfield Development Management Document; and the London Plan

2021, which was published and became part of the statutory development plan on 2 March 2021.

#### 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:

- LPGG1: Building Strong and Inclusive Communities
- LPGG2: Making the best use of land
- LPGG4: Delivering the Homes Londoners Need
- LPD3: Optimising site capacity through the design-led approach (\*):  
*Optimising site capacity through the design-led approach – sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations;*
- LPD4: Delivering good design
- LPD5: Inclusive design
- LPD6: Housing Quality and Standards: *Introduces a stronger policy on housing standards including minimum space standards.*
- LPD7: Accessible Housing
- LPD11: Safety, Security and Resilience to Emergency
- LPD12: Fire Safety
- LPD14: Noise
- LPH1: Increasing Housing Supply
- LPH2: Small Sites (sites below 0.25ha)
- LPH4: Delivering Affordable Housing
- LPH5: Threshold Approach to Applications
- LPH6: Affordable Housing Tenure
- LPH8: Loss of Existing housing and estate redevelopment
- LPH10: Housing Size Mix
- LPS4: Play and Informal Recreation
- LPG5: Urban Greening
- LPG6: Biodiversity and Access to Nature
- LPG7: Trees and Woodland
- LPSI3: Energy infrastructure
- LPSI4: Managing heat risk
- LPSI13: Sustainable drainage
- LPSI5: Water Infrastructure
- LPSI7: Reducing Waste and Supporting the Circular Economy
- LPT1: Strategic approach to transport
- LPT2: Healthy Streets
- LPT3: Transport capacity, connectivity and safeguarding
- LPT4: Assessing and mitigating transport impacts
- LPT5: Cycling
- LPT6: Car Parking
- LPT6.1: Residential Parking
- LPT7: Deliveries, Servicing and Construction
- LPT9: Funding transport infrastructure through planning

#### 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

#### 8.16 Enfield Core Strategy: 2010 (ECS)

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

ECP1: Strategic Growth Areas  
 ECP2: Housing supply and locations for new homes  
 ECP3: Affordable housing  
 ECP4: Housing quality  
 ECP5: Housing types  
 ECP6: Meeting Particular housing needs  
 ECP20: Sustainable energy use and energy infrastructure  
 ECP21: Delivering sustainable water supply, drainage and sewerage infrastructure  
 ECP22: Delivering sustainable waste management  
 ECP25: Pedestrians and cyclists  
 ECP30: Maintaining and improving the quality of the built and open environment  
 ECP32: Pollution  
 ECP36: Biodiversity  
 ECP40: North East Enfield  
 ECP41: Ponders End  
 ECP46: Infrastructure contributions

#### 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 Development Management Document policies are considered particularly relevant:

EDMD1: Affordable Housing on sites capable of providing 10 units or more  
 EDMD3: Providing a Mix of Different Sized Homes  
 EDMD6: Residential Character  
 EDMD8: General Standards for New Residential Development  
 EDMD9: Amenity Space  
 EDMD10: Distancing  
 EDMD37: Achieving High Quality Design-Led Development  
 EDMD38: Design Process  
 EDMD43: Tall Buildings  
 EDMD45: Parking Standards  
 EDMD46: Vehicle Crossovers  
 EDMD47: New Roads, Access and Servicing  
 EDMD48: Transport Assessments  
 EDMD49: Sustainable Design and Construction Statements  
 EDMD50: Environmental Assessment Methods  
 EDMD51: Energy Efficiency Standards  
 EDMD53: Low and Zero Carbon Technology  
 EDMD54: Allowable Solutions

EDMD55: Use of Roof Space / Vertical Surfaces  
EDMD56: Heating and Cooling  
EDMD57: Responsible Sourcing of Materials  
EDMD58: Water Efficiency  
EDMD61: Managing Surface Water  
EDMD65: Air Quality  
EDMD66: Land contamination and instability  
EDMD68: Noise  
EDMD69: Light Pollution  
EDMD72: Open Space Provision  
EDMD73: Children's Play Space  
EDMD78: Nature Conservation  
EDMD79: Ecological Enhancements  
EDMD80: Trees on Development sites  
EDMD81: Landscaping  
EDMD 83: Green Belt  
EDMD Appendix 9 - Road classifications

### **Other Relevant material considerations**

#### 8.18 Other Material Considerations

Ponders End Flour Mills Conservation Area Character Appraisal  
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)  
North East Area Action Plan: 2016  
Enfield Climate Action Plan (2020)  
Enfield Housing and Growth Strategy (2020)  
Enfield Biodiversity Action Plan  
Enfield Characterisation Study (2011)  
National Planning Practice Guidance  
Community Infrastructure Levy Regulations 2010  
LBE S106 SPD (Adopted 2016)  
London Councils: Air Quality and Planning Guidance (2007)  
TfL London Cycle Design Standards (2014)  
GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)  
GLA: London Sustainable Design and Construction SPG (2014)  
GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)  
GLA: Social Infrastructure SPG (2015)  
GLA: Housing SPG (2016)  
GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)  
Mayor's Transport Strategy (2018)  
GLA Threshold Approach to Affordable Housing on Public Land (2018)  
Healthy Streets for London (2017)  
Manual for Streets 1 & 2, Inclusive Mobility (2005)  
National Planning Practice Guidance  
National Design Guide (2019)  
Technical housing – nationally described space standards  
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

- 8.19 The Council consulted on Enfield Towards a New Local Plan 2036 “Issues and Options” (Regulation 18) (December 2018) in 2018/19. This document represented a direction of travel and the draft policies within it will be shaped through feedback from key stakeholders.
- 8.20 As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; and policy H4 (Housing mix) which identifies the borough’s needs for homes of different sizes and tenures.
- 8.21 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.
- 8.22 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***

- 8.23 **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**

8.24 **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

- Paragraphs 47 to 54 of the appeal decision considers the application of Policy D9: Tall buildings of the London Plan within the Borough and notes in paragraph 52 *“it is not entirely clear whether the policy limits tall buildings to locations that have been identified through a development plan or allows for tall buildings to come forward wherever their impacts can be shown to acceptable. In the context of what is widely accepted to be a housing crisis in London, and the length of time it might take for sites suitable for tall buildings to work their way through the various local planning processes across the capital, the latter would appear to me to make more sense”*.
- 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**

8.25 **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'*.
- Paragraph 86 comments on the assessment of tall buildings *'London Plan Policy D9 relates to tall buildings, stating that boroughs should determine if there are locations where tall buildings may be appropriate. Policy D9(B) states that tall buildings should only be developed in locations that are so identified. (Enfield) Policy DMD 43 does not identify any locations where tall buildings would be appropriate so it is not currently possible to comply with Policy D9(B) anywhere in Enfield. Nevertheless, as part of an overall assessment, it is appropriate to consider the proposal against the criteria in part (C) of the policy. Part (C)(1) relates to visual impacts, including long-range, mid-range and immediate views'*.

**2021 LB Hillingdon**

8.26 **High Court Judgment on London Plan, policy D9: Tall Buildings: LB Hillingdon v Mayor of London** [2021] EWHC 3387 (Admin): this judgment dated 15 December 2021 related to a judicial review of the decision made by LB Hillingdon on 30 March 2021, to grant planning permission for the construction of a mixed-used development, comprising buildings up to 11 storeys in height, at the site of the former Master Brewer Motel, Freezeland Way, Hillingdon. The case considered the application of Policy D9 of the London Plan. The key aspects of the judgement are set out below:

- Paragraph 81 *"Read straightforwardly, objectively and as a whole, policy D9:*
  - (i) requires London Boroughs to define tall buildings within their local plans, subject to certain specified guidance (Part A);*
  - (ii) requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B);*
  - (iii) identifies criteria against which the impacts of tall buildings should be assessed (Part C); and*
  - (iv) makes provision for public access (Part D)".*
- Paragraph 82 *"There is no wording which indicates that Part A and/or Part B are gateways, or pre-conditions, to Part C. In order to give effect of Mr Howell Williams QC's interpretation, it is necessary to read the words underlined below into the first line of Part C to spell out its true meaning:*  
*"Development proposals in locations that have been identified in development plans under Part B should address the following impacts." But if that had been the intention, then words to that effect would have been included within the policy. It would have been a straightforward exercise in drafting. It is significant that the Secretary of State's direction only required the addition of the word "suitable" to Part B(3). It did not add any text which supports or assists the Claimant's*

interpretation, even though the Secretary of State had the opportunity to do so.

- Paragraph 83 *“In my view, the context is critical to the interpretation. Policy D9 is a planning policy in a development plan. By section 70(2) TCPA 1990 and section 38(6) PCPA 2004, there is a presumption that a determination will be made in accordance with the plan, unless material considerations indicate otherwise. Thus, the decision-maker “will have to decide whether there are considerations of such weight as to indicate that the development plan should not be accorded the priority which the statute has given to it”: per Lord Clyde in City of Edinburgh at 1459G. Furthermore, the decision-maker must understand the relevant provisions of the plan “recognising that they may sometimes pull in different directions”: per Lindblom LJ in BDW Trading Ltd at [21], and extensive authorities there cited in support of that proposition. As Lord Reed explained in Tesco Stores Ltd v Dundee City Council, “development plans are full of broad statements of policy, many of which may be mutually irreconcilable, so that in a particular case one must give way to another”.*
- Paragraph 84 *“The drafter of Policy D9, and the Defendant who is the maker of the London Plan, must have been aware of these fundamental legal principles, and therefore that it was possible that the policy in paragraph B(3) might not be followed, in any particular determination, if it was outweighed by other policies in the development plan, or by material considerations. It seems likely that policy provision was made for such cases, given the importance of the issue”.*
- Paragraph 85 *“In considering whether to grant planning permission for a tall building which did not comply with paragraph B(3), because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C. The Claimant’s interpretation leads to the absurd result that a decision-maker in those circumstances is not permitted to have regard to Part C and must assess the impacts of the proposal in a vacuum.*
- Paragraph 86 *“In these circumstances, it is unsurprising that there are at least three decisions, both prior to and since the Defendant’s decision in this case, in which the Claimant’s planning officers have interpreted Policy D9 in the same way as the Defendant, in considering other tall building proposals in Hillingdon”.*
- Paragraph 87 *“In this case, the extracts from the officer reports which I have referred to above, explain that the Mayor found that the proposal did not fully accord with Policy D9, because it had not been identified as suitable in the development plan under Part B. Notwithstanding the non-compliance with Part B of Policy D9, the Defendant determined that the proposal accorded with the provisions of the development plan when read as a whole. That was a planning judgment, based on the benefits of the proposal, such as the contribution of much-needed housing, in particular affordable housing, and the suitability of the Site (brownfield and sustainable, with good transport). The Defendant was satisfied, on the advice of the GLA officers, that sufficient protection from air quality impacts would be achieved. The Defendant was entitled to make this judgment, in the exercise of his discretion.*
- Paragraph 88 *“For the reasons set out above, Ground 1 does not succeed”.*

## 9.0 ANALYSIS

### Main Planning Issues

- 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 National Planning Policy Framework (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 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 (2021) 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 proposed development assessed against National policy and the development plan policies.
- 9.4 The main planning issues raised by the Proposed Development are:
- Principle of Development
  - Housing Need and tenure mix
  - Design and character
  - Residential Quality and Amenity
  - Impact on neighbouring amenity
  - Open Space, Play Space, Landscaping and Trees
  - Biodiversity and Ecology
  - Transport, Access and Parking
  - Sustainability and Climate Change
  - Environmental Health
  - Flood Risk and Drainage
  - Section 106 agreement and planning obligations
  - Community infrastructure Levy (CIL)

### Principle of Development

#### Residential Development

- 9.5 The principle of residential development at the Application Site has been established through the existing residential use of site, which currently accommodates 10 x existing units. 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 (Section 8, above, and in paragraphs 9.16 – 9.45 of this report).

- 9.6 Chapter 11 (Making efficient use of land) of the NPPF (2021) states that in considering planning applications that substantial weight should be given to the value of using suitable brownfield land within existing settlements for homes (NPPF para 120(c)) and that planning decisions should 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 (NPPF para 120(d)).
- 9.7 Enfield's Authority Monitoring Report 2020/2021 shows that during the preceding 10 years, the Borough had delivered a total of 5,616 homes which equates to approximately 562 homes per annum. Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with only 60% of approvals 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 Draft Enfield Local Plan (Regulation 18) (2021) acknowledges the sheer scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough.
- 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.
- 9.10 London Plan Policy H1 highlights the urgency to optimise housing provision on brownfield sites, specifically identifying opportunity for housing intensification and development on publicly owned sites. The proposal supports the requirements of LPH1 optimising housing delivering on a suitable and available brownfield site within the Upper Lee Valley Opportunity Area.
- 9.11 Enfield's Core Strategy identifies North East Enfield as one of four strategic growth areas, where growth and development will be focused (ECS Policy 1). Adopted Core Strategy policies identify Ponders End, within North East Enfield, as a Place Shaping Priority Area supported by Core Policy 40 (North East Enfield). Adopted Development Plan policies ECP2 and ECP40 identify scope to deliver 1,000 new homes in North East Enfield. ECP2 and ECP40 also state that the focus for change, development and housing growth will be, in-part, within Ponders End in North East Enfield.
- 9.12 Adopted Core Strategy Policy 41 (Ponders End) identifies three areas for development, including Ponders End Waterfront – within which the Application Site is located. ECP41 seeks new development within the Ponders End Place Shaping Priority Area to create new homes, with a range of sizes and tenures, including affordable homes. The North East Area Action Plan: 2016 (NEEAAP) identifies that a new mixed-use, employment, leisure and residential community of exceptional quality will be sought within the Ponders End Waterfront of the NEEAAP.
- 9.13 The site is considered to be in C3 use and would be compatible with London Plan (2021) Policy GG2 (Making the best use of land), which advocates making the best use of brownfield land, maximising publicly-owned sites and finding opportunities for



sustainable intensification. The proposed development is considered to support LPPG2 Policy which seeks that development proposals: 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; and d) applying a design-led approach to determine the optimum development capacity of sites. The proposed development would make more efficient use of land by increasing the provision of housing, including the overall quantum of affordable housing at the Application Site. Given this site has been previously developed, the principle of a residential-led development with densities increased is supported.

#### *Principle of development conclusions*

- 9.14 The Application Site constitutes previously developed land and therefore the principle of developing the site for housing to support the Borough's housing delivery target is supported. The proposals would represent an uplift of on-site housing, including affordable housing, replacing 10 x existing units with 49 x high-quality new homes. The proposals would also represent an increase in on-site affordable housing, with 49% of the proposed new homes offered as Affordable Housing. The proposed intensification of delivery of homes is strongly supported by the NPPF and adopted development plan policies. The proposal exceeds LBE's adopted affordable housing Borough-wide Core Strategy target of 40% and is considered to accord with London Plan Affordable housing policy, when considered on balance. The principle of increasing housing at this location is supported.
- 9.15 While the site provides an appropriate setting for residential development, the proposed development does represent a shift in scale and residential density, when considered within the immediate context of Gilda Avenue – with resultant impacts. The Application Site is also experienced within the context of the vision for growth established in the Council's adopted Core Strategy and NEEAAP policies – and now under development immediately to the south-west of the Application Site along Alma Street. The Application site sits at the threshold of these differing conditions – and this is assessed in greater detail below (Paragraph 9.46 – 9.62).

### **Housing Need and Tenure Mix**

#### *Housing need*

- 9.16 Chapter 11 (Making efficient use of land) of the of the NPPF (2021) indicates that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site (NPPF para. 125). In these circumstances: local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF (Para. 125 (c)).
- 9.17 The London Plan sets a target for the provision of 66,000 new homes across London each year. Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority. However, only 60% of approvals in the Borough are being delivered. The London Plan 2021 identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10 years in the Borough, an increase over the previous target of 798.

- 9.18 Enfield's Housing and Growth Strategy 2020-2030 sets five ambitions, the first of which is 'More genuinely affordable homes for local people'. The ambition sets a priority to maximise housing delivery and use council assets to achieve this. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report, Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.
- 9.19 Taking into account the housing needs of Enfield's population, nationally- and regionally-set housing delivery targets and shortfalls in meeting targets and demonstrating sufficient housing land supply, it is evident that this proposal to make more effective use of the Application Site to provide a greater number of homes, at a high-quality and with a range of housing types is supported by adopted Development Plan housing policies, when consider as a whole.

#### *Affordable Housing*

- 9.20 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Annex 2 of the Revised NPPF (2021) defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)".
- 9.21 LPH4 outlines a strategic target for 50% of all new homes delivered across London to be affordable. LPH5 (Threshold Approach to applications) provides the affordable housing trigger points for major development, set at a minimum of 35% in this case. Notwithstanding the expectation for 35% on site affordable housing, policy permits that the LPA to require submission of viability evidence where it considers that proposals would not meet or exceed the relevant threshold level of affordable housing on site without public subsidy; would not be consistent with the relevant tenure split; would not meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant; do not demonstrate that they have taken account of the strategic 50 per cent target and have sought grant to increase the level of affordable housing (LPH(5)(C)).
- 9.22 Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on sites capable of accommodating ten or more dwellings. Enfield DMD Policy DMD1 supports the borough-wide target of 40% affordable housing in new developments, applicable on sites capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances. As noted, Enfield's adopted Development Plan polices, including Policies CP3 and DMD 1 are out-of-date relative to the more recently adopted London Plan (2021) housing polices and critically by virtue of Paragraph 11 of the NPPF.
- 9.23 NEEAAP Policy 5.1 states that new residential developments should provide a minimum of 40% affordable housing in accordance with Core Strategy Policy 3. However, given the viability issues of sites within North East Enfield, the Council will

take a flexible approach to the split of social rented, affordable rent and intermediate housing in order to support the delivery of new affordable homes. The target will be 60% social rented and affordable rent; and 40% intermediate.

- 9.24 Policy H2 of the New Enfield Local Plan, whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on development sites and that the Council will set a strategic target of 50% of new housing to be affordable.
- 9.25 According to the Enfield Local Housing Needs Assessment 2020, only households with acute housing need are on the Council's housing register, that is, eligible to be given Council housing. The vast majority of those on the register, or waiting list, live in temporary accommodation. Households who are not homeless or living in temporary accommodation rely on housing through the private sector and are typically supported by housing benefit. As of 2020, there were 12,300 households supported by housing benefit in the private rented sector within Enfield. The Assessment concluded that there is an annual net shortfall of 711 affordable rented homes. As the Assessment notes, this shortfall underrepresents the numbers of residents who are not in acute housing need but would still qualify for housing benefit to afford accommodation.

#### Affordable Housing Provision

- 9.26 The proposed development comprises a total of 49 x new homes, with 24 x new homes or 67 x habitable rooms offered as Affordable Housing. This represents 49% affordable housing by unit or 50% affordable housing by habitable room – which is above the threshold of 35% set out in LPH5(B)(1).
- 9.27 The Applicant has improved their Affordable Housing offer during consideration and negotiation of the planning application. The final improved offer has increased the proportion of low-cost rent homes (London Affordable Rent) homes.
- 9.28 24 x of the proposed new affordable homes are now offered on the following basis: 17 x new homes as London Affordable Rent (LAR) and 7 x new homes as Shared Ownership, classed as an intermediate affordable housing product. This represents a ratio of 71% genuinely Affordable Rent (LAR) and 29% intermediate homes (by unit) or 67.2% LAR : 32.8% SO by habitable room. The proposed tenure split is set out in detail below – and is to be secured in the s106 legal Agreement.

UNIT MIX AFFORDABLE RENT								
	1B/2P	2B/3P	2B/4P	3B/4P	3B/4P T	TOTAL UNITS	HAB ROOMS	NET
NUMBER OF UNITS	9	1	4	2	1	17	45	1080
UNITS AS %	52.9%	29.4%		17.6%				

UNIT MIX INTERMEDIATE						FAMILY UNITS		
	1B/2P	2B/3P	2B/4P	3B/4P	3B/4P T	TOTAL UNITS	HAB ROOMS	NET
NUMBER OF UNITS	1	4	0	2	0	7	22	529
UNITS AS %	14.3%	57.1%		28.6%				

UNIT MIX PRIVATE						FAMILY UNITS		
	1B/2P	2B/3P	2B/4P	3B/4P	3B/4P T	TOTAL UNITS	HAB ROOMS	NET
NUMBER OF UNITS	8	6	11	0	0	25	67	1594
UNITS AS %	32.0%	68.0%		0.0%				

- 9.29 Officers consider that the proposal of 49% affordable, with a ratio of 71%:29% LAR:SO (by unit) and 67.2%:32.8% LAR:SO (by habitable room) in the current climate is excellent.
- 9.30 While the dwelling mix has a higher proportion of smaller homes than Enfield's adopted, and emerging Development Plan policies seek Officers have considered these policies in the context of NPPF Paragraph 11 (tilted balance) and are furthermore satisfied that when considered in the context of recent Appeal decisions which highlight that mix targets should not be applied mechanistically to every scheme on every site (Section 8). Site specific considerations also indicate that the proposed mix is appropriate for this Application Site and scheme.
- 9.31 A viability assessment was submitted with the application, and independently reviewed on behalf of the Council. The submitted viability assessment concluded the development would result in a deficit of £3,940,000 based on 49% affordable housing on a LAR of 66% and 33% shared ownership tenure. The concluding comments of the BNP assessment stated... "Notwithstanding this deficit, the applicant is committed to bringing the scheme forward on its current basis as part of its programme to deliver affordable housing. However, this is dependent on the proposed unit and tenure mix". Officers note that the Application, as originally submitted included a new pedestrian bridge link to Mollison Avenue – which was subsequently removed due to its impact on viability. The removal of the link has also resulted in improvements to the scheme in respect of existing tree retention and biodiversity benefits. The Council's Viability Consultants undertook some sensitivity analysis, testing a different housing mix. A hypothetical model, with a greater proportion of three-bed units was tested. This resulted in an overall reduction of affordable housing within the scheme of 40% (by habitable room) and was concluded not to be viable. Officers note that the submitted viability assessment did not provide an assessment based on zero grant. However, given the proposed Affordable Housing offer is substantially in excess of 35%, with a tenure split in line with adopted Development Plan policies, Officers are satisfied the Applicant has demonstrated that the inclusion of grant has resulted in additional affordable homes, rather than using this funding to provide affordable units that would otherwise have been delivered.
- 9.32 The proposed London Affordable Rent homes are distributed across all Blocks: A, B and C. Intermediate (shared ownership) homes are proposed within Block A and private tenure homes are also proposed within Block A. All Blocks are of equivalent

high-quality design and the proposal is considered to be tenure blind, in terms of both internal and external specifications. Conditions and s106 obligations are recommended to ensure all occupiers have the same access to communal facilities, including the Block A upper storey terrace amenity space.

- 9.33 The delivery of 49% affordable housing by unit or 50% affordable housing by habitable room accords with existing and emerging policy and makes the best use of land to extend affordable housing provision in Enfield. Officers are satisfied that the proposed affordable housing offer represents the maximum level of affordability that the scheme could support. Officers recommend an Early Stage Viability Review – to ensure the Applicant builds out the permission to an agreed level of progress within two years of permission being granted in accordance with LPH5(E).
- 9.34 The proposals would accord with LPH5. ECS3 and Enfield DMD1 refer to a borough-wide aim to secure 70% of affordable housing as social rent units. In this case 71% low-cost rent is proposed (by unit). The Applicant has demonstrated that the proposed tenure set out in the schedule above is the maximum level of affordability that the scheme can support in conjunction with the mix profile proposed. Officers are satisfied that the significant need for affordable housing across all dwelling sizes in Enfield supports the proposed mix, and that the proposal would accord with ECS3 and Enfield DMD 1.
- 9.35 The proposed development 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 delivery within Enfield, significant weight should be attached to the housing delivery that would result from the proposals.

#### Dwelling Mix

- 9.36 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.
- 9.37 Enfield Policy CP5 of the Core Strategy (2010) seeks to provide the following borough-wide mix of housing: Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons). Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons). The mix of intermediate housing sizes will be determined on a site by site basis and the appropriate mix must take into account a range of factors, including development viability and the affordability of potential users.
- 9.38 The evidence base to support the unit mix set out in Core Policy 5 dates from 2008. More recently, the Local Housing Needs Assessment 2020 was prepared to support the emerging Local Plan and is the most up-to-date source of evidence - reflecting the requirements of London Plan Policy H10. Draft Local Plan Policy H3 (while it is not adopted policy), outlines priority types for different sized units across different tenures. The Council's Local Housing Needs Assessment 2020 outlines a range of need across 2 and 3-bed affordable rent homes (high-priority) and high-priority need across 1 and 2-bed intermediate homes, as the majority of households who live in intermediate (shared ownership) housing are households without children. This is based on housing register evidence and is set out below.

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

- 9.39 The proposal provides for a range of home sizes, including three (3) bed family size accommodation as set out below:

<b>Home Type</b>	<b>Number/ % of units</b>	<b>% habitable rooms</b>
1b2p	18 (37%)	27%
2b/3p&4p	26 (53%)	58%
3b4p	5 (10%)	15%
Total	49	

- 9.40 Officers have assessed that the proposal would be in accordance with London Plan Policy H10 but would not be strictly in accordance with ECS5 or Enfield Policy DMD 3 – although Officers note that prescribed Enfield housing are intended to be delivered across the borough, over the plan period and should not be applied mechanically. This policy interpretation was supported by the Planning Inspector considering appeal ref: APP/Q5300/W/20/3263151.
- 9.41 Officers consider the proposed mix can be supported, both due to the reasonable justification provided by the Applicant for the proposed mix, and when considering the relative policy weight of Enfield's housing policies relative to the more recently adopted London Plan housing mix policy – in addition to the implications of Paragraph 11 of the NPPF. As set out at Section 8 the Council's housing policies are considered to be out-of-date.
- 9.42 While the proposal does not accord with ECS5 or Enfield Policy DMD3, those Enfield Policies have been established to be in conflict with the more recently adopted housing mix policy of the 2021 London Plan (Policy H10). When considering recent appeal decisions for schemes in Enfield, Planning Inspectors (appeal refs: APP/Q5300/W/20/3263151 and APP/Q5300/W/21/3276466) are clear that any housing mix conflict should be resolved in favour of the more recently adopted policy (London Plan Housing Mix Policy H10). Policy H10 of the London Plan (2021) stresses the importance of and benefits of 1 and 2 bed dwellings in taking pressure off conversions of larger family homes to smaller dwellings.
- 9.43 Furthermore, Officers asked the Council's viability consultants to test the implications of a housing mix with a greater proportion of larger units and found that the result would reduce the overall proportion of affordable housing within the scheme. Officers are satisfied that the inclusion of more family-sized units would also mean a compromise to the amenity of these units as well as a loss of smaller homes and proportion of affordable housing overall. Given the evidenced need for new housing, it is considered that the collective benefits of the proposal outweigh the divergence of the dwelling size mix from policy.



*Housing conclusions*

- 9.44 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 the delivery of new homes should be given great 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, including provision of 49% Affordable Housing. The Applicant has provided justification in respect of the proposed housing mix, stating that Origin has agreement with Enfield Housing team in relation to their proposed housing mix.
- 9.45 The current mix is intended to provide starter homes for the existing residents on-site. In this respect, the Applicant has stated that a change in proposed housing mix would not support the mix discussed with the Council’s Housing Team. The Housing Team has confirmed that it supports the proposals. The Housing Team is eager to encourage and increase the number of Registered Providers developing in the Borough.

**Design and Character***High-quality design and layout*

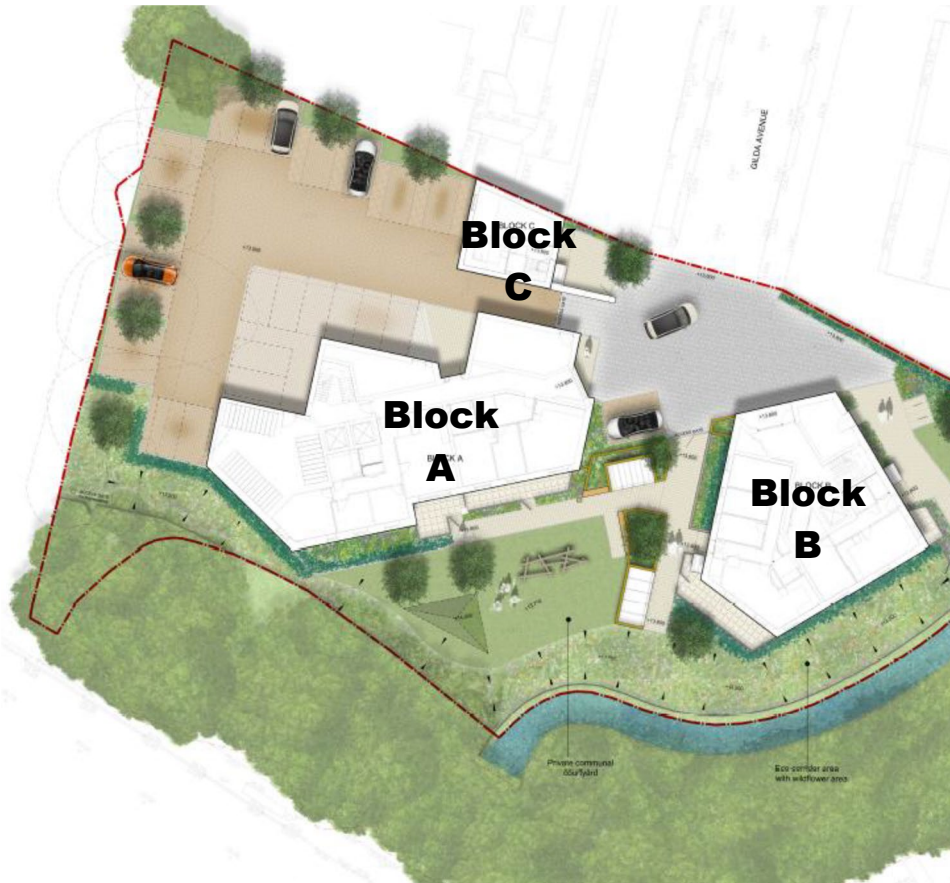
- 9.46 Chapter 12 (Achieving well-design places) of the of the NPPF (2021) emphasises the central value of good design to sustainable development (NPPF para 126). The Framework expects the planning process to facilitate “high quality, beautiful and sustainable buildings and places”. The assessment of 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 (NPPF para 130).
- 9.47 Good design is central to all objectives of the London Plan and the Council’s Local Plan policies. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment. LPD1 and LPD2 seek to ensure that new developments are well-designed and fit into the local character of an area. Policy D3 requires developments to optimise capacity through a design-led approach, by responding to a site’s context, capacity for growth and supporting infrastructure capacity. LPD3 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”.
- 9.48 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. 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.

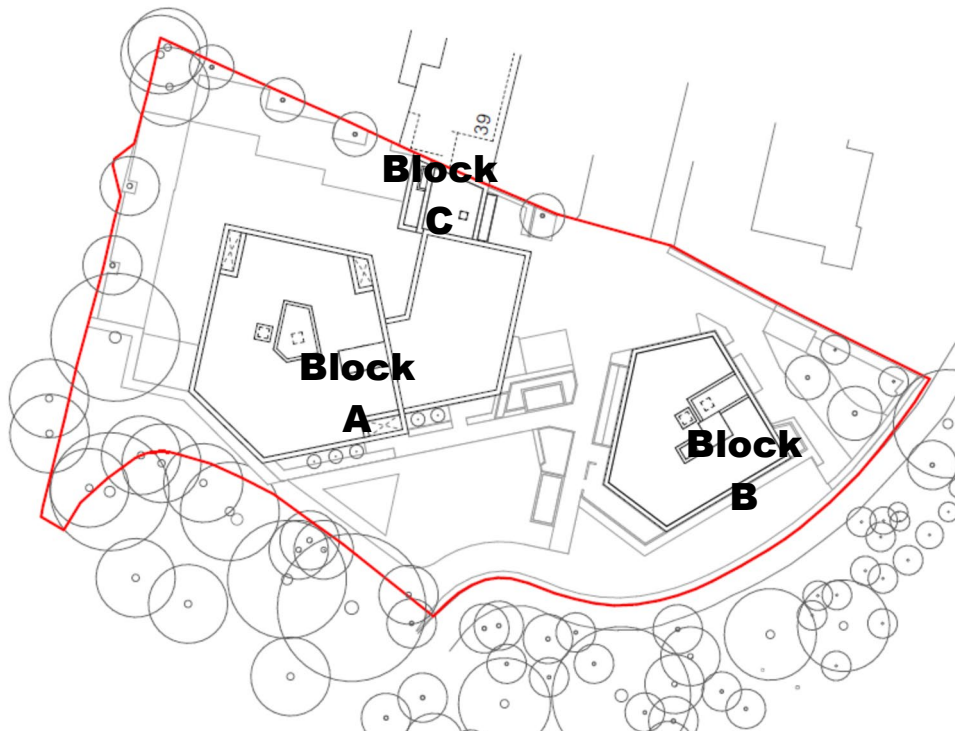
- 9.49 The proposals have been subject to extensive discussion with Council Officers. The proposed scheme has been subject to amendments during pre and post-submission negotiations, including a reduction in the maximum height of Block B.

#### Site Layout

- 9.50 The proposal would introduce a new housing typology within the immediate context of Gilda Avenue, which is generally characterised by two-storey terrace housing. The proposal would introduce 2 x Blocks (A and B) with larger footprints and one small footprint block, at Block C which accommodates a 3-storey townhouse. The existing development is characterised by blank north-facing flank walls which are considered to make a neutral to negative contribution to Gilda Avenue. The current open spaces are poorly delineated with limited diversity and interest – providing low residential amenity benefit, and low biodiversity value.








Proposed Ground Floor – landscape proposals



Proposed Ground Floor Block / roof plan

- 9.51 The proposal's site 'entrance' onto Gilda Avenue includes a new public arrival square, providing a shared surface for both pedestrians and vehicles to safely access the site. The scheme design will enhance surveillance towards the site's open spaces, public realm and create a clearer division between public and private spaces.
- 9.52 When considered in comparison with the existing condition Officers consider the proposed new entrance space would provide a meaningful public benefit, which would positively enhance the southern cul-de-sac termination of Gilda Avenue and result in an improved streetscape condition. Subject to recommended conditions and s106 obligation Officers consider that the proposed new public realm site entrance would result in a new high-quality space which is easy to understand, safe, attractive, uncluttered and effective – in accordance with LPD8, ECP Policies 9 and 25, and Enfield Policy DMD 37 of the Local Plan which state that new developments should deliver new public realm wherever possible.
- 9.53 Blocks A, B and C have been designed to allow views through the site from Gilda Avenue, creating visual separation between each form to reduce bulk and visual impact. Officers have sought amendments through the course of pre-application discussions to ensure that the layout of the proposed blocks maximises separation distances and minimise overlooking, overdominance and microclimatic impacts, both within the site and in respect of existing properties to the north (considered in further detail below).
- 9.54 Proposed block and new home layouts have been the subject of lengthy discussion, to ensure that dual aspect homes within the proposed development are maximised – allowing cross-ventilation opportunities for effective day and night cooling and minimising overheating. Officers consider the proposed block layouts, together with individual home layouts, achieve a good balance between creating new active frontages towards the public realm / streetscape, while preserving amenity to existing homes to the north along Gilda Avenue.
- 9.55 The proposal incorporates approximately 1,054sqm of communal amenity space and 217sqm of play space. Communal amenity space is proposed as part of a roof terrace within Block A (third floor) fronting the new public realm entrance. Play space is proposed to the rear of Block A and B, with a new eco-edge of approximately 503sqm bordering the play space to the south – creating a buffer between the proposals and existing mature vegetation to the south.



-  PUBLIC REALM / GREEN SPACE
-  PRIVATE AMENITY
-  PLAYSPACE
-  ECO-EDGE
-  COMMUNAL AMENITY



THIRD FLOOR

- 9.56 Officers have assessed that the block layouts are generally well resolved, and the Council's Urban Design Officers have not raised an objection in respect of proposed scheme layout. Minor amendments have been requested by the Council's Urban Design Officers in respect of bike storage and refuse access doors – which will be secured by recommended conditions.

#### Blocks A and B

- 9.57 As the tallest elements, Blocks A and B are considered in greater detail below. Block A has been located to the south of the Application Site, set back from the surrounding residential properties along Gilda Avenue, reducing the visual impact. Care has also been taken to minimise rooftop clutter to ensure a high-quality designed aesthetic. As assessed below, the design of Block A is considered to reduce its impact on the amenity of neighbouring occupiers. Block A incorporates a communal amenity space of 1,054sqm which would front onto the new public realm 'entrance' area. The Council's Urban Design Officers are supportive of the scale of Block A – and have stated that the provision of an amenity roof terrace for Block A is also supported subject to details of the design of this space being secured by way of condition.
- 9.58 Block B projects five (5) storeys in height positioned to the east of the site in proximity of Brimsdown Ditch. Block B is proposed to mirror the design and form of Block A to provide continuity of appearance and form. Officers note that in accordance with the requirements of London Plan Policy D9(A) Block B is not of sufficient height to be considered a 'tall building' under the London Plan definition.

#### Block C

- 9.59 Block C is the most northerly of the proposed Blocks, forming a lower 3-storey townhouse mediating element attached to the taller Block A proposed to the south. Block C is proposed to be built directly to the south of No. 39 Gilda Avenue – continuing the prevailing forward building line established by existing development fronting the western side of Gilda Avenue. The relationship between block A and C would be separated at ground floor by the vehicle access to the allocated parking to the north-west of the site.
- 9.60 Block C is proposed to accommodate 1 x proposed new home (C.00.01) which is proposed as a 3B4P new home, with front garden of approximately 13.1sqm with no rear garden amenity space proposed. Officers have assessed the lack of rear private amenity space in respect of this proposed new home (C.00.01). In the first instance the front garden of 13.1sqm is considered to be suitably enclosed to provide meaningful amenity benefit for this single dwelling. When assessed against the minimum space standards of adopted policy LPD3 (Table 3.1) and the statutory 'Technical housing – nationally described space standards' the proposed home is oversized by approximately 12sqm with proposed Gross Internal Area (GIA) of 102.9sqm compared with a minimum internal space standard for 3B4B 3-storey dwellings of 90sqm. Officers also recommend a Communal Amenity Space Plan be secured by s106 obligation – to ensure that residents across all tenures have equal access to the proposed community amenity spaces within the scheme. This should include the amenity roof terrace proposed to Block A.
- 9.61 An objection has been received raising concerns in respect of the impacts on rear access to the rear garden of 39 Gilda Avenue – which currently has a rear gate which accesses the hardstanding / surface car park along the site's northern boundary. The Applicant has amended their plans to rearrange car parking spaces to ensure this



rear access gateway is no longer affected. Officer recommend that 24/7 access be secured by s106 obligation.

- 9.62 Officers consider that the layout of Block C is well resolved and provides a successful intermediary element between the established building pattern along Gilda Avenue and proposed Blocks A and B to the south.

***Density and tall buildings policy***

- 9.63 The 2021 London Plan has amended the policy approach to assessing density. Whereas previous policy set out ranges of appropriate density based on location and site access, the current Policy D3 emphasises the importance of a design-led approach to optimise site capacity, including site allocations. This removes the standardisation of density calculations with a more site-specific evaluation. ECP5 5 states that density should balance the need to make the most efficient use of land, account for accessibility to transport and respect existing character. Enfield DMD6 is also guided by the London Plan density matrix (which has now been superseded by current London Plan Policy D3, as above), wanting to ensure scale and form are appropriate, the development is of a high quality and regard is given to housing mix targets.
- 9.64 LPD9 relates to tall buildings, stating that boroughs should determine if there are locations where tall buildings may be appropriate. Policy D9(B) states that tall buildings should only be developed in locations that are so identified. Enfield Policy DMD 43 does not identify any locations where tall buildings would be appropriate so it is not currently possible to comply with London Plan Policy D9(B) anywhere in Enfield – until a new Local Plan is adopted. However, recent planning appeal decisions have indicated that in the current policy context it is appropriate to consider tall building proposals in the context of limbs D9(C)(2)(3) and (4) of London Plan Policy D9.
- 9.65 London Plan Policy D9 outlines that Development Plans should define what is considered a tall building for specific localities, the height of which will vary but should not be less than 6/7 storeys (or 18 metres to the floor level of the uppermost storey). Block A is proposed to have an overall height of 25.6m, or eight storeys and is the only Block defined to fall within the definition of a ‘tall building’ in accordance with London Plan policy.
- 9.66 Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of “tall buildings” are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria).

***Tall buildings***

- 9.67 The proposed development is formed of an eight storey Block A and five (5) storey Block B with a modest three (3) storey Block C.
- 9.68 In respect of Block A, the Block is proposed to have a maximum height of 25.6m or eight storeys. Block A is the tallest element proposed and would be read as eight storeys above ground level when viewed from the north along Gilda Avenue. Due to the substantial level difference between Gilda Avenue and Mollison Avenue and the A110 (Lea Valley Road) Block A would appear as a lower element when viewed from the south and east, appearing approximately two to three storeys lower. The height of

Block A would be a departure from the immediate height context, albeit the recent development at Alma estate, including approved masterplan heights and the proximity to a highway intersection are considered to support a case for greater height at this location. There would also be an element of screening when viewing the proposal from the south, west and east.

- 9.69 Block B projects five (5) storeys in height positioned to the east of the site in close proximity to the Brimsdown Ditch. Block B would mirror the design and form of Block A to provide continuity of appearance and form.
- 9.70 Block C is proposed to be (3) storeys in height, linked to Block A above Ground level. The layout and form of the block is intended to provide a visual connection and correlation with the existing built form on Gilda Avenue. Block C would be built on the boundary with No 39 Gilda Avenue and continue the pattern of the street development. The relationship between block A and C would be separated at ground floor by the vehicle access to the allocated parking to the north-west of the site.
- 9.71 The design of the buildings has been considered in line with the requirements and guidance of Policy D9 of the London Plan and supporting text, and the criteria set out in Policy DM 43 (Parts 3 and 4) of the Local Plan. The below provides an analysis of the proposed development against the requirements of Policy D9 of the London Plan.

<b>Definition</b>	
<p><b>A</b> Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</p>	<ul style="list-style-type: none"> <li>• In respect of Block A, the Block is proposed to have a maximum height of 25.6m or eight storeys and is considered to comprise a 'tall building' in accordance with Paragraph 6.4.1 of the Council's DMD and Paragraph 3.9.3 of the London Plan. Block B is proposed to be five (5) storeys in height – and according to the requirements of London Plan Policy D9(A) should not be considered a 'tall building' when considered in the context of adopted London Plan policy.</li> </ul>
<b>B Locations</b>	
<p>1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p>	<ul style="list-style-type: none"> <li>• The Council does not have any up-to-date policies which formally identify suitable locations for tall buildings.</li> </ul>

<p>2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</p>	<ul style="list-style-type: none"> <li>• The Council does not have any up-to-date policies which formally identify suitable locations for tall buildings.</li> </ul>
<p>3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p>	<ul style="list-style-type: none"> <li>• Specific suitable locations have not been identified by the Council.</li> <li>• Paragraph 86 of appeal reference APP/Q5300/W/21/3276466 states that in the assessment of tall buildings 'London Plan Policy D9 relates to tall buildings, stating that boroughs should determine if there are locations where tall buildings may be appropriate. Policy D9(B) states that tall buildings should only be developed in locations that are so identified.</li> <li>• (Enfield) Policy DMD 43 does not identify any locations where tall buildings would be appropriate so it is not currently possible to comply with Policy D9(B) anywhere in Enfield. Nevertheless, as part of an overall assessment, it is appropriate to consider the proposal against the criteria in part (C) of the policy. Part (C)(1) relates to visual impacts, including long-range, mid-range and immediate views, and these are considered in greater detail below.</li> <li>• Although not adopted as policy and having limited weight, the Application Site is identified within a suitable location for tall buildings as set out within Figure 7.4 of the emerging Enfield Local Plan, being located within a 10-minute walk (or 800m radius) of Ponders End. The supporting text to draft Policy DE6 states that tall buildings might be considered near town centres if within a short walking distance (up to 800m as measured along the actual</li> </ul>

	<p>walking route) and appropriate within the context where this does not adversely impact on the visual hierarchy of the location.</p> <ul style="list-style-type: none"> <li>The walking distance from Ponder End Station to the Application Site is around 0.5 miles / 804 m. The site is located within a radial distance of 800m of Ponder End Station. Officers are satisfied the criteria above are met – and have considered the relative weight of the emerging Enfield draft Local Plan.</li> </ul>
<b>C Development proposals should address the following impacts:</b>	
<b>1) Visual impacts<sup>1</sup></b>	
<p>a) the views of buildings from different distances:</p>	<ul style="list-style-type: none"> <li>Height and mass consideration are set out in the Design and Access Statement (DAS) submitted in support of the application and considered further below.</li> <li>Officers accept the design and appearance would introduce a contemporary and tall building in a location where the immediate context comprises two storey terrace and semi-detached properties. Officers consider that the increased height in comparison to the prevailing height along Gilda Avenue is an appropriate response when considering site as part of the wider vision for Ponders End – which includes the development of the Alma Street masterplan. In respect of the tallest element, Block A, Officers have considered the significant difference in levels between the site and the surrounding Mollison Avenue and Lea Valley Road to the east and south. The height difference between the site and these roads</li> </ul>

<sup>1</sup> Also required by Enfield Policy DMD 43 Part 4 (c)(e)(f)

	<p>varies between 7 and 3 metres – resulting in a reduced visual impact when viewing the proposal from the south, east and west.</p> <ul style="list-style-type: none"> <li>• The scheme has evolved alongside an assessment of the townscape impact, as set out in the Townscape and Visual Assessment submitted in support of the application.</li> </ul>
<p>i. long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.</p>	<ul style="list-style-type: none"> <li>• The proposed lower storeys of Blocks A and B would be located below the tree line – when viewed from the south and south-east. The railway line and treeline at this location would also obscure the lower portion of the proposal when viewing the scheme from the west.</li> <li>• Block A would be seen in the context of the approved Alma Road masterplan, including the existing tall buildings at Ponders End station (up to 16 storeys).</li> <li>• The Council’s Urban Design Officers conclude the arrangement and massing on site considered acceptable in the townscape. The variable angles proposed on the building successfully create a slenderer looking building in respect of Block A – which helps create a more elegant skyline to avoid adverse impacts on long-range views.</li> <li>• Special attention has been paid to the tops of the Blocks – with the proposed fenestration pattern of the top floors of Block A elongated of lower floors to emphasise the ‘top’. While the design gives some prominence to the upper floor it is considered to beneficially emphasise building hierarchy and terminate Block A.</li> </ul>

	<ul style="list-style-type: none"> <li>• The site layout has ensured that there is visible separation between the blocks – minimising the impact on long-range views.</li> </ul>
<p>ii. mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.</p>	<ul style="list-style-type: none"> <li>• The Council's Urban Design Officers have concluded that the arrangement of massing on the site is considered acceptable in townscape terms – and consider that the proposed variable angles of Blocks A and B would be creating interesting forms and slender looking buildings.</li> <li>• The use of identical materials across the proposal is considered to aid legibility.</li> <li>• In terms of mid-range views, the proposal would be seen from the northern end of Gilda Avenue, and to the south, east and west. There would be a contrast with the suburban character of Gilda Avenue, such that the viewer would be aware of a transition in scale. Block A would be separated from the existing houses by Block C and the public entrance area. Whilst there would be a change to the townscape, Officers do not consider that this would be harmful.</li> </ul>
<p>iii. immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.</p>	<ul style="list-style-type: none"> <li>• Block C creates a pedestrian scale environment when entering the Application Site from Gilda Avenue to the north. The heights of Blocks A and B are then set back from Gilda Avenue and seen in the context of the existing mature tree belt to the south of the site – with the 16-storey tower located at Ponders End Station (Alma Road) seen in the background of the Application Site.</li> </ul>



<p>b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.</p>	<ul style="list-style-type: none"> <li>• The proposed building heights would reinforce the building height hierarchy set out in the emerging Local Plan. The maximum height of Block A is substantially lower than that of the tall buildings proposed and existing within the Alma Road masterplan.</li> <li>• Proposed building heights are considered to be responsive and appropriate to the changing character and scale of the local area.</li> </ul>
<p>c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.</p>	<ul style="list-style-type: none"> <li>• The materials proposed are of a high quality and have been selected following a detailed review of the local context.</li> </ul>
<p>d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.</p>	<ul style="list-style-type: none"> <li>• As set out at paragraph 9.133, there are no heritage assets within the site boundary. The site is within view of the Ponders End Flour Mills Conservation Area which includes a number of listed buildings – with the tallest element within the proposal (Block A) located over 120m from the Ponders End Flour Mills Conservation Area boundary. It is also within view of the listed former well station. The Applicant has submitted a supporting Townscape and Visual Assessment and Built Heritage Statement which are considered below.</li> <li>• Impact on the heritage assets is reduced as far as practicable – for example, by reducing rooftop 'clutter'.</li> </ul>
<p>e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.</p>	<ul style="list-style-type: none"> <li>• Not applicable to this site.</li> </ul>
<p>f) buildings near the River Thames,</p>	<ul style="list-style-type: none"> <li>• Not applicable to this Site.</li> </ul>

<p>particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.</p>	
<p>g) buildings should not cause adverse reflected glare.</p>	<ul style="list-style-type: none"> <li>The proposed buildings would be constructed of matt materials and conditions have been recommended to ensure that all glazing is specified to reduce the risk of glare.</li> </ul>
<p>h) buildings should be designed to minimise light pollution from internal and external lighting.</p>	<ul style="list-style-type: none"> <li>The facades have been arranged to provide a suitable ratio of glazing to brick/concrete with consideration for daylight sunlight, overheating and minimisation of light pollution.</li> <li>The residential nature of the proposed development at upper floors means that curtains/blinds will usually be drawn during hours of darkness which minimises potential light pollution.</li> <li>As assessed below the proposals perform well when assessed against overheating criteria.</li> </ul>
<p><b>2) Functional impacts<sup>2</sup></b></p>	
<p>a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.</p>	<ul style="list-style-type: none"> <li>The design has considered access arrangements to occupant needs. The internal circulation arrangements have been subject to refinements during pre- and post- submission discussions.</li> </ul>
<p>b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should</p>	<ul style="list-style-type: none"> <li>The Applicant is an established registered social landlord, with experience providing and managing residential development. .</li> </ul>

<sup>2</sup> Also required by Enfield Policy DMD 43 Part 4(a)(b)(g)

<p>be considered at the start of the design process.</p>	
<p>c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.</p>	<ul style="list-style-type: none"> <li>• Building circulation has been carefully considered, including amenity and light levels within internal circulation.</li> </ul>
<p>d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.</p>	<ul style="list-style-type: none"> <li>• Existing bus stops on Naggs Head Road and the Application site are located between a 4.5- and 7.5-minute walk from the Application Site. There are also bus stops served by the 491 only in closer proximity. Ponders End station is approximately 10-12-minute walk from the Application Site.</li> <li>• The supporting Transport Statement and Travel Plan submitted provide an assessment of public transport capacity. Officers are satisfied that trips generated as a result of the proposed development can be accommodated, subject to conditions and s106 obligations.</li> <li>• Appropriate contributions have been agreed through a Section 106 towards increasing capacity of local schools as needed to support the proposed development.</li> </ul>
<p>f) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design, so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.</p>	<ul style="list-style-type: none"> <li>• The proposed development would provide a net increase in employment during construction phase. Officers have recommended that an Employment &amp; Skills Strategy be secured by way of s106 obligation.</li> </ul>
<p>g) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</p>	<ul style="list-style-type: none"> <li>• The proposed development would not have any adverse impacts. Details of the construction would be provided in the detailed Construction Management Plan to be secured by condition.</li> </ul>

<b>3) Environmental impacts<sup>3</sup></b>	
<p>a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.</p>	<ul style="list-style-type: none"> <li>The Applicant has submitted a Daylight and Sunlight report (ROL00233 prepared by Anstey Horne) in support of the planning application. Previous concerns raised in respect of the 8-storey element on existing properties and their associated amenity space were raised during pre-application discussions – and the Applicant was encouraged to make further refinements and undertake further detailed analysis in support of the proposed scheme. Officers have carefully assessed the daylight, sunlight and overshadowing impact on neighbouring properties to the north. The Applicant's analysis has been carried out using 3D computer modelling and specialist computer simulation software – and is considered in greater detail as Section 9.85 below.</li> </ul>
<p>b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.</p>	<ul style="list-style-type: none"> <li>Officers consider that the proposed buildings are appropriately spaced and would not cause any adverse impacts. Block layouts have been assessed above. EHO Officers have confirmed that they have no concerns regarding air quality, subject to conditions.</li> </ul>
<p>c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</p>	<ul style="list-style-type: none"> <li>The Applicant has submitted an acoustic report in support of the planning application and EHO Officers have concluded that they have no concerns regarding air noise impacts. Conditions are recommended. Officers are satisfied that the proposed development would not detract from the comfort and enjoyment of open spaces as a result of any noise impacts.</li> </ul>

<sup>3</sup> Also required by Enfield Policy DMD 43 Part 4(h)

<b>4) Cumulative impacts<sup>4</sup></b>	
<p>a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting.</p>	<ul style="list-style-type: none"> <li>• The proposed development has evolved and has been considered in the context of existing development along Gilda Avenue and wider Ponders End context.</li> <li>• The proposed development is considered to respond positively to its context and no mitigation measures are required beyond those already considered in the scheme design.</li> </ul>
<b>Public Access</b>	
<p>D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.</p>	<ul style="list-style-type: none"> <li>• As assessed above, Officers consider that when considered in comparison with the existing condition that the proposed new publicly accessible entrance area would provide a meaningful public benefit, which would positively enhance the southern cul-de-sac termination of Gilda Avenue and result in an improved streetscape condition.</li> <li>• Officers consider that the residential nature of the proposed development means that it is not appropriate to provide public access within the buildings – and furthermore consider that the proposal is not so tall as to be of sufficient prominence to require an upper storey publicly accessible area. A roof terrace within Block A is provided and accessible to residents.</li> </ul>

### Design Overview

- 9.72 The Council's Urban Design Officers have concluded that due to a combination of factors, an 8-storey building at the Application Site can be supported and is justified. The Council's Urban Design Officers acknowledge that the Application Site represents a unique location, at an important road junction which together with the sunken nature of the site, the relationship of the Application Site with the buildings in the approved Alma Estate masterplan and the scale of existing infrastructure and open space near the site justifies an 8-storey building at the Application Site.

<sup>4</sup> Also required by Enfield Policy DMD 43 Part 4(d)

- 9.73 The Council's Emerging Local Plan acknowledges the need to 'exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities' which remains a 'first principle' of the document (paragraph 2.4.1). As assessed above, Officers consider the proposal would accord with LP21 Policy GG2, which seeks to make the best use of land, including through enabling the development of brownfield land. It would also accord with LPH1, which seeks to increase housing supply by optimising the potential for housing delivery on suitable brownfield sites. Policy D3 seeks to optimise site capacity through a design-led approach. This includes enhancing local context by delivering buildings and spaces that positively respond to local distinctiveness, enhancing heritage assets and being of high architectural quality. For the reasons assessed above, Officers consider that the proposed development would optimise site capacity through a design-led approach – and would accord with Policy D3.
- 9.74 Officers accept the design and appearance of the proposal would introduce a contemporary and tall building in a location whereby the immediate context is of two storey terrace and semi-detached properties. Nevertheless, the departure from the character context is not considered to be harmful to the location or context. Block A would be seen in the context of the approved Alma Road masterplan, including the existing tall building at Ponders End station.
- 9.75 The proposal is assessed as being in accordance with LP21 policies GG2, H1 and D9(C) and (D).
- 9.76 It would not accord with Policy D9(B) because no locations for tall buildings have yet been identified in Enfield. Paragraph 86 of appeal reference APP/Q5300/W/21/3276466 states that in the assessment of tall buildings 'London Plan Policy D9 relates to tall buildings, stating that boroughs should determine if there are locations where tall buildings may be appropriate. Policy D9(B) states that tall buildings should only be developed in locations that are so identified. (Enfield) Policy DMD 43 does not identify any locations where tall buildings would be appropriate so it is not currently possible to comply with Policy D9(B) anywhere in Enfield. Nevertheless, as part of an overall assessment, it is appropriate to consider the proposal against the criteria in part (C) of the policy. Part (C)(1) relates to visual impacts, including long-range, mid-range and immediate views, considered above. While the proposal is not considered to accord with DMD43, as noted above, there is currently a conflict between the out-of-date blanket presumption against tall buildings policy approach taken by DMD43 of the Local Plan and the approach taken by London Plan Policy D9 – requiring that Council identify appropriate locations for tall buildings and then assessing their impacts as set out above. For the purposes of LPD9, a proposal can be in a location which is outside those areas identified as appropriate for tall buildings but be acceptable when its impacts are assessed under part C of the policy.
- 9.77 In such cases where there is a conflict in policy approach, Section 38 (5) of the Planning and Compulsory Purchase Act 2004 states *"if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan"*.
- 9.78 On this basis, it is considered that limited weight should be applied to DMD43 of the Local Plan and precedence should be given to Policy D9 of the London Plan in assessing the appropriateness of tall buildings on the application site. Given the out-of-date policies of the Council's Local Plan (in particular, Policy DMD 43 as referenced above) and the limited weight attributed to emerging Local Plan Policies in

accordance with the NPPF paragraph 48, the Development Proposals should therefore be considered in the context of up-to-date policies including the London Plan (2021) as required by the NPPF (Paragraph 11d) and footnote 7).

- 9.79 On balance, the proposal is considered to be consistent with the provisions of Policy CP30 of the Core Strategy, Policies DMD8 and DMD37 of the Development Management Document, and the NPPF (2021).
- 9.80 Policy DMD 83 of the Enfield Development Management Document seeks to assess development proposals against their impact on the Green Belt. For the avoidance of doubt the site is not within the Green belt designation and does not adjoin or border the Green Belt. The NPPF (2021) and London Plan (2021) do not contain policies that directly affect development sites adjacent to the Green Belt. The proposed development would have a greater impact than the current scheme in site in respect of the views and vistas. The Application Site is visible when approaching from the west, along Lea Valley Road, including the existing Alma Road masterplan development to the south of the Application Site. The massing and siting of the proposed development provides a clear separation distance from the delineated Green Belt boundary. 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 existing tall buildings within similar relationships with the Green Belt boundary is considered a material consideration.
- 9.81 The Metropolitan Green Belt is located, to the east. The topographical characteristics and existing industrial development to the east of the Application Site are relevant. As set out, ground level within the Application Site is substantially lower than the surrounding highways infrastructure to the south and east – which serve to spatially and physically sever the Application Site from the Conservation Area, Green Belt and broader context. The site is brownfield land and has been assessed in the principle of development section, concluding that the Application Site represents an appropriate and suitable location to optimise site capacity. Considering Paragraph 11 of the NPPF and the tilted balance in favour of presumption of sustainable development, alongside the significant weight given to the public benefits of the scheme and no encroachment on the Green Belt, the impact on the Green Belt is acceptable in these circumstances.
- 9.82 The proposal represents a high-quality design and optimises the site providing an attractive setting for future occupiers. Officers are comfortable and supportive of the proposed design and conclude that the proposal represent a sustainable development.

#### **Standard of accommodation**

- 9.83 Policy D6 of the London Plan 2021 and Policy DMD 8 of the Enfield Development Management Document (2014) set minimum internal space standards for residential development. The Nationally Described Internal Space Standard applies to all residential developments within the Borough and the London Mayor's Housing SPG adopted in 2016 has been updated to reflect the Nationally Described Space Standards.
- 9.84 The proposed residential flats all exceed the minimum required floorspace requirements as per the National internal floorspace standards. All the flats are dual aspect. The dual aspect nature of the proposed residential units allows cross-flow ventilation opportunities allowing effective day and night cooling. The residential units



pass the CIBSE TM59 over heating test and thereby secure high-quality internal accommodation.

- 9.85 An Internal Daylight Report Daylight & Sunlight report (ROL00233 prepared by Anstey Horne Dated 19 May 2020) confirmed the majority of the internal flats would receive the minimum recommended light standards, assessed against the BRE 2011 guidance. Para 6.12 of the submitted daylight report clarifies that “Of the 79 rooms assessed for sunlight availability, 66 (84%) meet the guidelines on an annual basis and 72 (91%) achieve the guidelines on a winter basis. The guidelines advise that in housing the main requirement for sunlight is in living rooms and that bedrooms and kitchens are considered of less importance. Of the 34 LKD’s assessed, 30 (88%) achieve the guidelines on an annual basis and 31 (91%) achieve the guidelines on a winter basis”.
- 9.86 All major residential development must be accompanied by proposals to provide on-site playspace open space as per Policy S4 (Play and Informal Recreation) of the London Plan (2021) and guidance within the adopted document “Shaping Neighbourhoods: Play and Informal Recreation SPG (2012). Policy S4 sets out core expectations of play space. 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
- 9.87 217m<sup>2</sup> of playspace is provided at ground floor to the south of the site segregated in to broadly under 5’s and 5-11 year old segments. The quantum of provision has been increased following revisions to the Affordable Housing offer (increasing the proportion of London Affordable Rent homes). There is a minor shortfall of space when considered against the GLA population yield calculator of 5sqm. Officers are satisfied that this minor shortfall is offset by the broader amenity improvements to the site, and the qualitative aspects of the proposed play area – which adjoins the proposed eco-edge. Officers are satisfied that overall the play provision is also aligned with the emerging Local Plan which identifies the value of informal, doorstep and play-on-the-way spaces that are integrated into landscape design.
- 9.88 The proximity of the Development Site and proposed use as residential to the Railway line and the partially elevated Lea Valley Road requires consideration against external loss to habitable rooms. The applicant submitted a noise report commissioned by KP acoustics (Ref 18729.NIA.01, dated 17/04/2019). The concluding report stated “measured noise levels allowed a robust glazing specification to be proposed which would provide internal noise levels for all residential environments of the development commensurate to the design range of BS8233. Further mitigation measures could be required in order to protect the proposed habitable spaces from external noise intrusion during periods of overheating”.
- 9.89 Officers consider sufficient designs of openings and mechanisms to prevent loss transfers can be achieved within the structure and will be a condition as part of a planning approval to retain high-levels of sound insulation. The condition would be required to meet the following, A) Acoustic design statement/scheme for mitigation

measures including but not limited to enhanced glazing, mechanical or passive ventilation measures shall be submitted to and approved by the local Planning Authority prior to development occupation of the hereby approved flats. B) The sound insulation shall ensure that the level of noise generated from external sources shall be no higher than 35 dB(A) from 7am - 11pm in bedrooms, living rooms and dining rooms and 30 dB(A) in bedrooms from 11pm - 7am measured as a LAeq,T. The LAF Max shall not exceed 45dB in bedrooms 11pm - 7am more than 10 times during the night time period.

- 9.90 The LPA recognise the need to utilise sites to their optimum and judged against the complaint standard of accommodation, the development would accord with London plan (2021) policies, Housing standards SPD (Adopted March 2016), Enfield Core Strategy 4 (Housing quality) and Enfield Development Management Document policies DMD 8, DMD 9, DMD 37 and DMD 72.

### **Impact on Neighbouring Amenity**

- 9.91 Policy D6 of the London Plan 2021) sets out buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst minimising overshadowing and maximising the usability of outside amenity space.
- 9.92 Policy CP30 of the Core Strategy seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Policies DMD 6 and 8 of the Development Management Document (2014) seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.
- 9.93 The applicant has submitted a daylight An Internal Daylight Report Daylight & Sunlight report (ROL00233 prepared by Anstey Horne Dated 19 May 2020) which included a full assessment of the light impacts to the adjacent terraced properties comprising No 38, No 39 and No 40 Gilda Avenue and 135 Alma road on the opposing side of the Railway line to the west of the site. The light report assesses the impact on the light to windows and the rear garden.
- 9.94 Objections have been received to a loss of light to Nos. 37 and 39 Gilda Avenue. 39 Gilda Avenue is the property of greatest impact and is addressed as follows: 'This end of terrace property (No 39 Gilda Avenue) is located to the north of the development, on the western side of Gilda Avenue. The daylight distribution contours can be found on drawing number ROL00223\_R06\_V01\_202. The results indicate that of the 14 windows tested for VSC, 13 retain values above the guideline 27% and are therefore BRE compliant. The remaining window (W2 on the first floor) is reduced to 0.77 times former value which is only marginally outside of the BRE's guideline value of 0.8. The window in question is a secondary window to a room served by a much larger window which achieves the guideline values". The objection has questioned the accuracy of the assessment in respect of No. 39 Gilda Avenue, as the layouts of this property are based on a mirror image of No. 37. However, while there has been an estimate of internal arrangements and room uses, this does not impact the results for VSC or APSH because these measures assess a reference point in the centre of the window, rather than room layout or size.

- 9.95 The proposed development by nature of its southern location to No 39 Gilda Avenue would result in overshadowing to the garden of No 39 Gilda Avenue. The BRE 2011 light guidance states that “if, as a result of new development the area which can receive two hours of direct sunlight on 21 March is reduced to less than 0.8 times its former size, this further loss of sunlight is significant. The garden or amenity area will tend to look more heavily overshadowed”.
- 9.96 The submitted light report confirms in plan form 66.7% of the rear garden of No 39 Gilda Avenue would retain two (2) hours of sunlight per day on the 21st of March. Currently 80.5% of the garden receives two (2) hours of sunlight per day. The guidance target is for 50% of the gardens to retain two (2) hours of direct sunlight per day. The applicant at the request of the LPA provided Transient overshadowing (Ref ROL00223\_R06\_V02 301-305) for both March and June dates during the year. The transient light study confirms the rear garden would receive light to the principal rear amenity areas in the mid morning and post 14.30 during the day. In the summer months (June-sept) the rear elevation would receive uninterrupted direct sun from midday onwards.
- 9.97 In respect of overlooking, the north elevation of Block A would have a separation distance of approximately 15m from the rear amenity space of No 39 Gilda Avenue, thereby representing the opportunity for overlooking between first and fourth floors. Windows and terraces above fourth floor are generally proposed to have tight angles of downward view coupled with the height of vision makes privacy concerns of lesser impact. In order to prevent overlooking the north facing windows serving the respective units of Block A between first and fourth floor, presenting eight (8) units are proposed to be obscure glazed. An objection has been received in respect of annotation errors on the Design and Access Statement submitted in support of the planning application. Officers note that this is a supporting document, and do not recommend its inclusion of part of the approved documents.
- 9.98 The existing quality of outlook from surroundings properties to the site would be maintained and the existing side access to No 39 Gilda Avenue would be retained, albeit this is principally a civil matter opposed to a direct planning consideration.
- 9.99 The proposed development has been assessed against policies protecting neighbouring amenity and no unreasonable effect is identified. The LPA acknowledge the development would have an impact on the amenity of the adjacent terrace property No 39 Gilda Avenue, yet as shown in the reports and measures undertaken the impact would be acceptable and within the threshold of acceptability when judged against adopted planning policy.

### **Sustainable Drainage and Water Infrastructure**

- 9.100 The site is located within Flood Zone 1 – meaning the site has a low probability of flooding from rivers and sea. It is not subject to flood risk and has limited drainage and flood risk constraints. The applicant has submitted a FRA and Drainage strategy (Prepared By TPA, dated December 2021, Ref FRA01 Rev D) to address the drainage implications of the development.
- 9.101 The Application has been subject to lengthy discussions and negotiations in respect of water management. The Council’s LLFA Officer remains concerned that the Applicant should provide an updated FRA prior to consideration by Committee Members. LLFA Officers also consider the Applicant should make greater efforts to secure the naturalisation of the culvert which runs along the site boundary.

- 9.102 Policy SI 12 of the London Plan (2021) outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield runoff rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63.
- 9.103 The submitted FRA includes calculation of the Greenfield run of rates and source control measures. Green roofs and permeable paving have been incorporated to the surface water drainage layout, which is detailed in Chapter 5 of the submitted drainage report. Following a review by the Councils LLFA Officers, there are no objections to the details submitted. As part of a detail landscape plan additional information shall be requested by way of condition to increase sustainable green drainage on site and consider the feasibility of naturalising the ditch to the south-east of the Application Site boundary.
- 9.104 Officers have recommended a condition to secure a feasibility study in respect of naturalising the adjoining culverted waterway. The Applicant is resistant to this condition but considering the ongoing concerns from the Council's LLFA Officer that the condition should be recommended.
- 9.105 Thames Water have confirmed subject to adherence to the sequential approach to the disposal of surface water we would have no objection. On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, there are no objections.

### **Highway, Access and Parking**

- 9.106 London Plan (2021) Policy T1 sets a strategic target of 80% (75% in Enfield) of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards. Policies T6 and T6.1 to T6.5 set out car parking standards.
- 9.107 The applicant submitted a Transport Statement (Prepared by YES engineering Group Limited Dated May 2021) and a Travel Plan (Prepared by YES Engineering Group Ltd Dated May 2021) to support the planning application. Both documents have been assessed by the LPA transportation officer.

### Access

- 9.108 Existing bus stops on Naggs Head Road and the Application Site are located between a 4.5- and 7.5-minute walk from the Application Site. There are also bus stops served by the 491 only in closer proximity. Ponders End station is approximately 10-12-minute walk from the Application Site.
- 9.109 A new pedestrian link was originally proposed between the site and Mollison Avenue. While Officers consider that removal of a new access point which would have connected the site with Mollison Avenue is regrettable, this is balanced with the viability impact the link was having on the scheme – and the policy and priority need

to delivery affordable housing. The removal of the link has also resulted in improvements to the scheme in respect of existing tree retention and biodiversity benefits.

#### Traffic Surveys and Proposed Vehicle Parking

- 9.110 Policy DMD 45 seeks to minimise car parking and to promote sustainable transport options. The Council recognises that a flexible and balanced approach needs to be adopted to prevent excessive car parking provision while at the same time recognising that low on-site provision sometimes increases pressure on existing streets.
- 9.111 Car parking proposals will be considered against the standards set out in the London Plan and:
- a. The scale and nature of the development,
  - b. The public transport accessibility (PTAL) of the site;
  - c. Existing parking pressures in the locality;
  - d. Accessibility to local amenities, and the needs of the future occupants of the developments.
- 9.112 Twenty-nine (29) on-site parking spaces are provided at ground level (5 of which will be blue badge). The London Plan (2021) expects car free to be the starting position albeit in appropriate and suitable locations.
- 9.113 Transport Officers have welcomed the increase in car parking spaces during consideration of the planning application. Transport Officers have set out an expectation of 31 car parking spaces (based on 2011 census). As noted above 29 spaces car parking spaces are proposed – which is marginally less. Transport Officers have concluded that the proposed provision is acceptable amount and is assessed as complying with the parking requirements of adopted London Plan policy, which sets maximum parking standards. Furthermore, Officers have considered the 2011 Census data for the Ponders End Ward which indicates an existing average of 0.5 cars per flat and the site's location within a sustainable location (4.5- and 7.5-minute walk from existing bus stops on Naggs Head Road and 10-12-minute walk from Ponders End station).
- 9.114 The applicant has undertaken parking surveys. These indicate that there are 73 on-street parking spaces within 200m of the site – all of which are unrestricted. Of the 73 unrestricted spaces, a maximum of 50 were occupied (69% stress), which leaves 23 spaces available for use by future residents and their visitors. Therefore at least 23 parking spaces were available for use within a 200m walking distance. Therefore, there is some flexibility in the surrounding roads to accommodate overspill parking. Mitigation measures are secured, in the form of contributions towards Transport Officers have noted that some of the locations of these spaces are located to the east, within the existing industrial area. Therefore, while Officers are satisfied in respect of proposed parking provision – Officers have also sought additional reassurance and mitigation to reduce the likelihood of on-street parking pressures, including s106 contributions towards sustainable transport infrastructure near the site and Cycle Enfield. The contribution would be directed towards cycle infrastructure, additional cycle parking and potential pedestrian realm improvements and feasibility provision of a car club spot within the site or no more than a 10min walk of the site.
- 9.115 Policy T.6 of the London Plan (2021) provides maximum parking standards and therefore the provision of twenty-nine (29) spaces for residents of forty-nine (49) units

is considered below the maximum standards and closer to a ratio of 0.6 parking spaces per unit.

#### Cycle provision

- 9.116 Policy T5 (Cycle Parking) of the London Plan (2021) expects a minimum cycle provision for developments of 1 space per studio/1-bedroom dwelling, 1.5 spaces per 2 bedroom dwelling and 2 spaces per all other dwellings. A total of 93 cycle parking spaces are proposed, comprising 89 long stay spaces and 4 short stay spaces. These amounts are in accordance with London Plan standards. The proposed layout is not optimum and subject to an approval a condition would be applied to review the sitting and layout.

#### Refuse/serving

- 9.117 Standard 22 of the adopted London Plan Housing SPD (2016) expects “communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface”.
- 9.118 The refuse storage would be located within Blocks A and B at ground floor and full accessible to refuse operatives to collect. A mix of 1100L (refuse) and 1280L (recycling) bins would be provided with appropriate segregation. Each refuse bin can serve four (4) flats. As part of the recommendation a refuse operational management document would be required to secure additional details pertaining to the locking mechanism and the presentation and collection of refuse.
- 9.119 The quantum of trips to the site would increase but the transport officer has no concerns regarding network capacity impacts. The different modes of transport used to formulate the modelling of the transport statement have not followed local census data, albeit the transport officer does not object to the increased vehicle movements. The increased trip generation would not be harmful to the highway integrity or other road users.

#### Transport conclusion, including contributions

- 9.120 As part of the development a total highway and transport contribution of £37,800 is sought, formed of sustainable transport in the borough (£22,391) and £15,415 contribution towards Cycle Enfield.
- 9.121 It is acknowledged that the existing car occupancy level on Gilda Avenue is high, but that many existing homes have an existing driveway and parking spaces. Officers have closely monitored the situation and will continue to do so. Excessive provision of car parking spaces would be contrary to the London Plan Policy T6(L). It is considered that the development will have a limited impact on the highway network. Based on TRICS trip rates the overall development would generate just 7 additional traffic movements during the morning peak hour and 5 extra traffic movements in the evening peak hour.
- 9.122 As discussed in the Principle of Development and Housing Need and Mix sections, the provision of genuinely affordable housing on brownfield land is strongly supported. Officers have assessed and concluded that the proposed parking provision would be enough to meet the potential demand and help address existing and future parking pressure in the area. The proposed development would not result in conditions prejudicial to the safety and free flow of traffic in the surrounding area.

- 9.123 Having regard to the above, on balance, the proposal would comply with Policies 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).

### **Biodiversity Impacts**

- 9.124 Policy G6 of the London plan (2021) states “development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process”. The applicant has not submitted a BNG report and because of the fact the proposed blocks would be built on broadly the existing two buildings foot print, there would be no identified loss of biodiversity. Existing open spaces within the existing site comprise hardstanding and lawn – with low on-site biodiversity value. The proposals include an eco-edge – with increased biodiversity value.
- 9.125 New eco-edge native wildflower planting is proposed to be located to the south of the site, providing a generous green buffer and providing opportunities for biodiversity and new tree planting is also proposed along the western and northern boundaries of the site. The proposal has also been designed to ensure that suitable maintenance of the Brimsdown watercourse can be undertaken, alongside edge enhancements that will result from the provision of a new eco-edge.
- 9.126 The removal of the bridge link during the process of the submission, further mitigated concerns at biodiversity loss and as such in this particular instance a Net Gain report is not considered to be necessary.
- 9.127 A bat emergence survey was conducted by the Greengage, commissioned by the applicant and no roosting bats were identified. The report concludes “no roosting activity was identified during the survey, and bats can therefore be presumed likely absent from the buildings. Moderate levels of bat foraging and commuting activity were observed during the emergence and activity survey. Seven species were recorded; common pipistrelle, soprano pipistrelle, nathusius’ pipistrelle, noctule, Leisler’s, serotine and brown long eared bats.
- 9.128 Mitigation and enhancement measures to ensure the site retains and improves its value for bats are recommended in the report and shall form planning conditions.

### **Impact on Trees**

- 9.129 Part (c) and (d) of Para 180 of Section 15 of the NPPF (2021) states

*c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>58</sup> and a suitable compensation strategy exists; and*

*d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.*



- 9.130 London Plan Policy G7 states that where development proposals result in the removal of trees, adequate replacement trees should be planted based on the existing value of the trees to be removed. Legislation under BS 5837: 2012, alongside Policy CP36 (Biodiversity) of the Enfield Core Strategy (2010) and Policy DMD 80 of the Enfield Development Management Document (2014) all expect existing mature trees on development sites to be protected.
- 9.131 Initially the erection of a pedestrian bridge from the site to Mollison Avenue resulted in the loss of trees and careful consideration of the impact. The applicant submitted a Tree survey and AIA (MJC tree services, Ref MJC-18-0235, Dated 15<sup>th</sup> May 2020). Considering the changes to the scope of development the tree report is now largely defunct as the core area of potential tree loss and concern was the bridge location. As noted, the Council's Tree Officer has no objections to the development subject to compliance with the submitted arboricultural report and landscape plans. Officers recommend conditions to ensure compliance with the submitted arboricultural report and landscape plans
- 9.132 Now the bridge has been removed the impact to the trees on site is considered acceptable and not harmful to the wider biodiversity. The Council's Tree Officer has confirmed that they have no objections to the development subject to compliance with the submitted arboricultural report and landscape plans.
- 9.133 Officers recommend conditions to ensure compliance with the submitted arboricultural report and landscape plans. As part of a landscape condition further trees shall be sought to improve habitats and shading.

### **Sustainability and Climate Change**

- 9.134 Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan (2021) expects major development to be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation
  - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - 4) be seen: monitor, verify and report on energy performance.
- 9.135 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
  - 2) off-site provided that an alternative proposal is identified and delivery is certain
- 9.136 The applicant has submitted Energy report (Prepared by RPS consultancy, dated 06-06-2020), the report follows the GLA energy statement guidance and energy hierarchy and adopting SAP 10 carbon factors. The development does not

meet Carbon Zero but provides and exceeds a baseline of 35% above Building regulations. A total carbon shortfall of 38.6 tonnes per CO2 per annum. Based on the domestic development emissions charge, a price of £95/Tonne is applied and therefore a carbon off-set contribution of £69,635 is applicable and secured with in the s106 legal agreement.

### **Land & Air contamination**

- 9.137 The applicant has submitted a land contamination report prepared by SLPR (Ref 425.09468.00001 Version 01 dated April 2019) to confirm testing of the soil and whether there are contaminants present.
- 9.138 An Air Contamination prepared by South-downs environmental consultants (Ref 2303W-SEC-00001-02 – dated June 2020 ) relating to the construction impacts of the development. The environmental officer has assessed the report and considers subject to the measures identified carried out in full, there is no objection.
- 9.139 Environmental Health does not object to the application for planning permission as there is unlikely to be a negative environmental impact. There are no concerns regarding air quality, noise or contaminated land. A contamination report has been submitted which concluded that there are no concerns with land contamination due to historical sources. Conditions have been recommended in response to EHO Officer recommendations.

### **Heritage and archaeological**

- 9.140 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”*.
- 9.141 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).

- 9.142 LPHC1 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.
- 9.143 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.
- 9.144 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.
- 9.145 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.
- 9.146 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’ objection<sup>5</sup>. 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 considerations<sup>6</sup>. What follows is an officer assessment of the extent of harm which would result from the proposed development.

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<sup>5</sup> *Barnwell vs. East Northamptonshire DC* 2014 (para.29)

<sup>6</sup> *Kinsey vs. London Borough of Lewisham* 2021 (para.84)

- 9.147 Where harm is caused to a designated heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. In the case of any harm being identified paragraph 200 requires there to be a 'clear and convincing' justification. If the harm is deemed to be less than substantial, paragraph 202 of the NPPF requires the harm to be weighed against the public benefits of the proposal, including, 'where appropriate', securing the optimum viable use of the heritage asset. Where the harm is caused to a non-designated heritage asset, paragraph 203 states 'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.
- 9.148 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*

- 9.149 There are no designated or non-designated heritage assets within the site boundary.
- 9.150 There are four Grade II listed buildings to the south and south-east of the site, most within the Ponders End Flour Mills Conservation Area. Mill Owner's House, Barn to south of Mill Owner's House, Old Mill Buildings and House to East of Old Mill Buildings. The former Well Station (Lea Navigation) to the south east of the site is listed grade II and also relevant to the assessment. 75 South Street, which is also listed grade II, is further separated from the site and is scoped out of this assessment.
- 9.151 The site is within view of the Ponders End Flour Mills Conservation Area – with the tallest element within the proposal (Block A) located approximately 120m from the north-west extent of the Ponders End Flour Mills Conservation Area boundary. The closest asset which positively contributes to the Conservation Area is over 190m from the tallest element within the proposal (Block A) – and the Conservation Area focal point is over 330m from proposed Block A. A map of the conservation area with the relevant assets is attached within the report appendices.
- 9.152 The Ponders End Flour Mills Conservation Area covers the land and buildings that comprise Wright's Mill, an area where industrial use has been sustained through extensions and modernisation undertaken while retaining the older buildings. The mill is a unique example in the borough of the once-numerous 19th century industries powered by the water of the River Lea. The special interest of the conservation area is summarised in Conservation Area Character Appraisal (2015) as 'A rare survival of an 18th and 19th century flour mill, with earlier origins, retaining its original buildings within a modern processing plant; there has been continuity of use on the site since the 16th century and possibly earlier' (3.1.1).
- 9.153 The topographical characteristics of the Conservation Area, when considered in the context of the Application Site, are also relevant. As set out above, ground level within the Application Site is substantially lower than the surrounding highways infrastructure to the south and east – which serve to spatially and physically sever the Conservation Area from the Application Site and broader context.
- 9.154 The Ponders End Flour Mills Conservation Area Character Appraisal explains that public appreciation of the Conservation Area is limited to what can be seen from outside the Conservation Area boundary – and that the best vantage point is from the

pedestrian bridges, including over Meridien Way which gives a panoramic overview of the walled garden and the mill group in its setting of water meadows, and an awareness of the interlacing and over-sailing transport routes – footpath over rail and road, roads over water, roads over railway, major roads over minor roads – that contains the mill complex.

- 9.155 This means that the most important views require that viewers either turn their back towards the Application Site, to view the Conservation Area – or view the Application Site as a relatively distant and obliquely located (relative to the Conservation Area) background element. The setting of the conservation area, however, is more than how it is viewed from outside. The water courses and water meadows surrounding the flour mills are identified in the Character Appraisal as forming part of its setting: 'Looking north, east and south, there is a tranquil setting of river and water-meadow, its willows and wildlife co-existing with high intensity transport infrastructure and the marginal non-spaces of random industrial development beyond' (para 2.5.4). The new development will partially enclose the view, although these impacts are considered to be no greater than those of the Alma Estate redevelopment. That scheme was previously found acceptable, when balanced against the benefits of that scheme – which includes affordable housing.
- 9.156 There are also non-designated heritage assets included in the Local Heritage List which will experience change as a consequence of the proposals. There are structures at: 173 Alma Road, the Ediswan Building and three buildings within the Ponders End Flour Mills Conservation Area including, the walls of the 18th Century basin and sluice, the entrance lodge cottage and the garden walls to south west of the flour mill.
- 9.157 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. A Heritage Assessment was 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. The supporting material includes detailed consideration of eight static views which were agreed in consultation with the Council's Conservation Officer at the time, in 2020.
- 9.158 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. Of the key views assessed in the heritage statement, the applicants' views analysis indicates that, whilst there may be some limited visibility of the proposed development, there will be a neutral impact on the significance of the designated and non-designated heritage assets. Whilst Officers broadly agree with these assessments there are three views affecting the designated assets which have been subject to further consideration:
- 9.159 a. *View 4 View 4: View north west from A110 at north eastern boundary of Ponders End Mills Conservation Area.* In this view the proposal is visible, including the upper storey elements of Block A, which would appear above the established tree line during summer and winter months. At the point that the A110 passes over the River Lea Navigation, it is possible to view the Conservation Area, with the proposed development seen to the north. This view has been impacted, over time by recent

additions – which include the development resulting from the Alma Road masterplan. The heritage statement concludes that the impact of the development on the setting of the assets is consequently neutral and Officers agree with this assessment. It should be noted that the buffer of trees is important to reaching this conclusion.

- 9.160 b. *View 5 from south east boundary of Ponders Mills Conservation Area.* In this view the proposal is visible across the water meadows. The significance of the water meadows to the setting of the heritage assets is discussed at 9.150. There are currently long, open views out from the site across the meadows, with few incursions into the skyline from tall buildings; rare in this otherwise industrial landscape. The view analysis from the applicants concludes that the impact of the development will not detract from the conservation area's setting and represents a lesser intrusion than the permitted Alma estate. Officers' assessment is that the visibility of the development illustrated will be a cumulative, but less than substantial harm to the setting of the conservation area. The identified harm is at the lower end of less than substantial. However, there is also potential for enhancement of the affected conservation area and its setting in the Conservation Area Management Plan (2015).
- 9.161 c. *View 6 from Long view from A110 from east side of River Lea Navigation.* This view shows the relationship of the proposed development to the upper floors of the listed former Well Station (Lea Navigation) as viewed from the A110. It demonstrates upper floors of the new development will be visible in the context of the former Well Station. However, the development is at some distance, already compromised by the road structure and the aspect of the setting that will be affected makes no contribution to the significance of the asset. The heritage statement identifies a neutral impact and Officers agree with this assessment.
- 9.162 Officers have concluded that there is less than substantial harm to the Ponders End Conservation Area in respect of the visibility of the scheme and the cumulative impact of the scheme and the permitted scheme for the Alma Estate. However, these impacts are modest, less than those of the Alma Street redevelopment, and are outweighed by the public benefits of delivering 49 new homes, including 24 affordable homes. There is potential for enhancement of the conservation area. This balance is reinforced by the presumption in favour of approving sustainable residential development.
- 9.163 The Applicant has submitted an Archaeological desk-based Assessment and Heritage Statement to support the planning application. The Application Site lies within the Lea Valley West Bank Archaeological Priority Area as designated by the London Borough of Enfield (DLO35151).
- 9.164 Notwithstanding this designation Officers agree with the conclusion of the report which states that 'due to the generally low archaeological potential of the study site and the likely localised severity of past post-depositional impacts, it is considered that the proposed development is highly unlikely to have a substantial archaeological impact. Officers recommend conditions in respect of the excavation of the Application Site, whereby if archaeological remains are found then building work is halted and specialist heritage works are undertaken to appraise the value of the find.

#### Heritage Conclusions

- 9.165 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. Having regard to these the conclusion of the heritage assessment is that there is limited less than substantial

harm (at the lower end) to the setting of the Ponders End Flour Mills Conservation Area. For the other designated and non-designated heritage assets the impact has been identified as neutral. There is also an identified potential to enhance the setting of the conservation area through landscape enhancements of the water meadows and tree planting in the Ponders End Flour Mills Conservation Area Management Proposals.

- 9.166 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 asset<sup>7</sup>. 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.
- 9.167 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use. This does not mean there is no harm but acknowledges there may be public benefits that outweigh this identified level of harm. The level of harm is assessed as most likely to be at the lower end of 'less than substantial' harm – opening up an ability to weigh the harm against the public benefit of the scheme. In this case, 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 meaningful biodiversity enhancements and play spaces). Officers consider that the impact of the Conservation Area is no greater than less than substantial.
- 9.168 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. This does not mean there is no harm but acknowledges there may be public benefits that outweigh this identified level of harm. The level of harm is assessed as most likely to be at the lower end of 'less than substantial' harm – opening up an ability to weigh the harm against the public benefit of the scheme. In this case, 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 meaningful biodiversity enhancements and play spaces). Officers consider that the impact on the Conservation Area is no greater than less than substantial.

#### **Other Matters: Social economic**

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

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<sup>7</sup> Kinsey vs. London Borough of Lewisham 2021 (para.82)



- 9.170 The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies. It is recommended that s106 planning obligations secure the following:
- Local Labour (during demolition and construction phases):
  - Employment & Skills Strategy submitted and approved prior to commencement
  - All reasonable endeavours to secure 25% of workforce
  - Apprenticeships or trainees
  - Local goods and materials

Employment & training:

- Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets.
- Training opportunities
- Partnership working with local providers/programmes

Accessible units

- 9.171 London Plan Policy D7 requires at least 10% of new dwellings to constitute Building Regulations M4(3) wheelchair user dwellings. Of the Forty-nine (49) proposed dwelling flats, over 10% of units are designed to meet this standard exceeding the policy threshold.

Security

- 9.172 Final details of the appearance and form of the gate detail and access arrangements to the site shall form pre-commencement conditions. The MET Police have reviewed the development and have sought planning conditions. Officers consider the layout of residential development to provide high levels of passive surveillance.

**10. Section 106 agreement and planning obligations:**

- 10.1 The planning application is subject to financial contributions secured via s106 legal Agreement with the following heads of terms

10.2 Transport – Sustainable

- 10.3 A contribution of up to £22,391 towards the sustainable transport infrastructure in the vicinity of the Development Site would be secured. The contribution would fund (but not be limited to) the following,
- a. Cycle infrastructure including proposed segregated lanes
  - b. Cycle parking (including at stations, shops)
  - c. Pedestrian Environment Review System study
  - d. Crossing points

Transport – cycle Enfield pedestrian pathway

- 10.4 A contribution of up to £15,415 towards Cycle Enfield.

Transport – car club

A contribution of up to £15,000 secured via a s106 towards the feasibility provision of a car club spot within the site or no more than a 10min walk of the site shall be identified.

- a. This payment provides 2 years free membership
- b. identification of site within site local highway network

Climate Change and the Environment

- 10.5 A Contribution (Carbon Offset Payment) towards the Carbon Offset Fund(utilised by LB Enfield towards the provision of measures for securing CO2 reduction in the vicinity of the Site) of £69,635 shall be secured.

Education

- 10.6 A Payment of £122,500 for the purposes of mitigating the impact of the Development on educational services and for the provision of additional educational facilities and school places in the Borough, especially targeting specialist school places.

Affordable Housing Contribution

- 10.7 A total of Twenty-four (24) affordable units would be provided on site  
17 x new homes as London Affordable Rent (LAR)  
7 x new homes as Shared Ownership  
The Development shall be subject to an Early stage Review mechanism  
Nominations agreement

10.8 Employment and Training

- a. Local Labour (during construction phase)
- b. Employment & Skills Strategy submitted and approved prior to commencement of development (definition of development in this instance not including demolition) using reasonable endeavours to secure:
  - (i) 25% of local workforce,
  - (ii) 1 x apprentice or trainee (up to) for every £1m contract value (figure to be agreed during drafting of s106 subject to formula) (financial contribution to be provided if exceptional circumstance exist),
  - (iii) Quarterly apprenticeship reporting & targets
  - (iv) Local goods and materials, and
  - (v) Partnership working with local providers/programmes

**Other**

- 10.9 Considerate Constructors Scheme.
- 10.10 LBE Management monitoring fee (maximum 5% of value of financial contributions).
- 10.11 Communal amenity space management plan (ensure that all homes have access to communal amenity space, including unit C.00.01)
- 10.12 Rear access to 39 Gilda Avenue – 24/7 access.

## **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 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 £60 per sqm as of 1st April 2019).

### *Enfield CIL*

- 11.2 The Council introduced its own CIL on 1 April 2016. The money collected from the levy (Regulation 123 Infrastructure List) will fund rail and causeway infrastructure for Meridian Water and other projects in the borough. Enfield has identified three residential charging zones. The site falls within Enfield's Lower Rate Eastern Zone (£40/sqm) – so a potential contribution of approximately £118,192.00 would be calculated (without Social Housing CIL Relief). The figure would be lower if relief was applied. Figures are approximate at this time.

### *Mayoral CIL*

- 11.3 An approximate figure of £145,053.92 in respect of Mayoral CIL would be calculated (without Social Housing CIL Relief). The figure would be lower if relief was applied. Figures are approximate at this time.
- 11.4 All figures above are subject to the BCIS figure for CIL liable developments at time of CIL processing.

## **12 Public Sector Equality Duty**

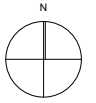
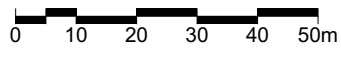
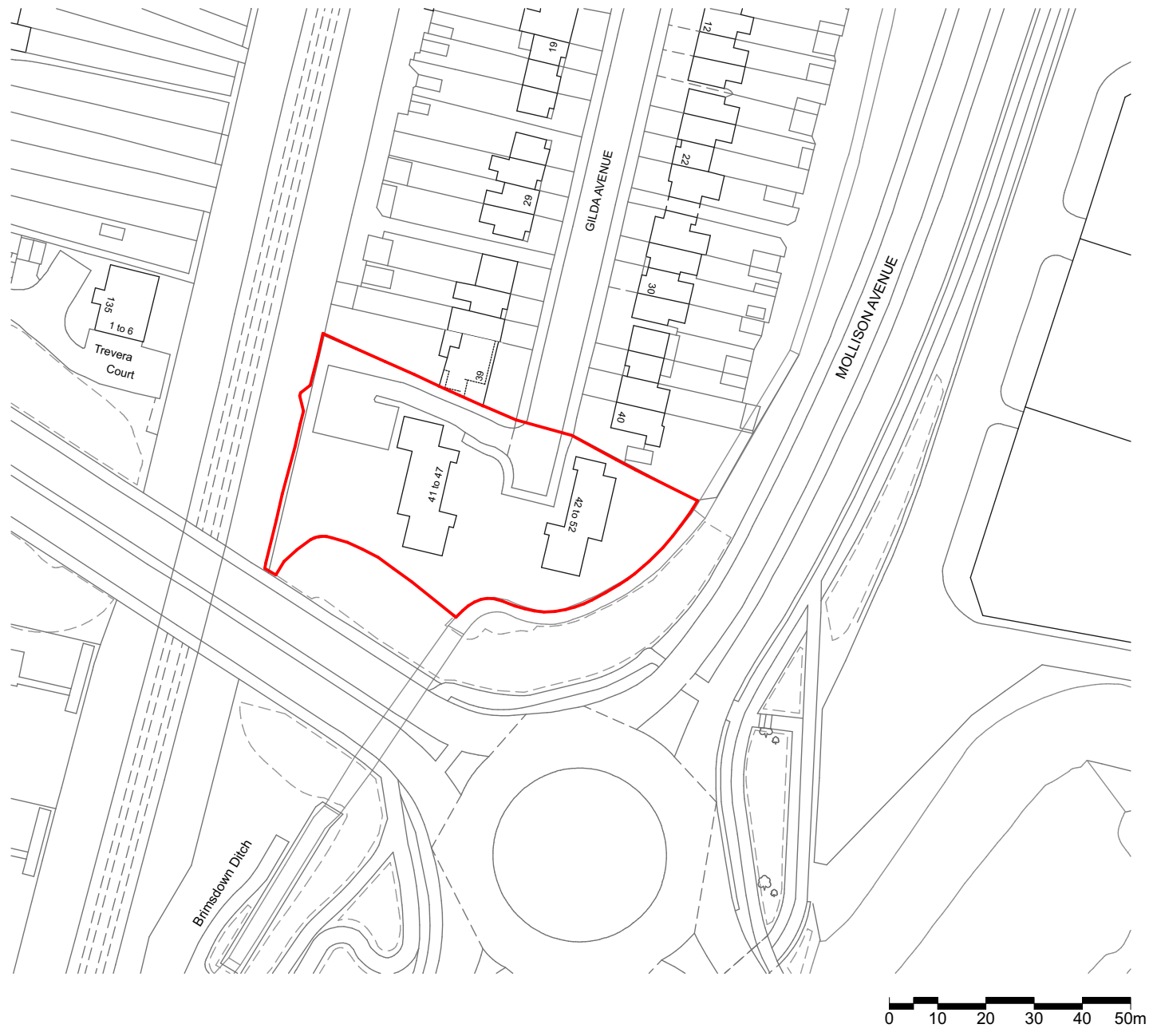
- 12.1 In accordance with the Public Sector Equalities Duty, an equalities impact assessment has been undertaken. The Applicant has stated a preference to accommodating existing residents within the proposal – and agreed to a nominations agreement, with a preference for a cascade mechanism in respect of accommodating existing residents. As a result, it is considered the proposal would not be considered to 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.

## **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, including provision of 49% Affordable 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 significant weight in favour of the proposed development.
- 13.4 Having regard to the assessment in this report, the development would provide 49 x new homes which 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, when assessed against the policies in the NPPF, when taken as a whole.
- 13.5 It is acknowledged and recognised throughout this report, that consideration of this proposal has involved finely balanced judgements. Compromises have been made in the consideration of the proposal massing and scale in order to optimise the development potential of this sustainable brownfield site and thus contribute to the Borough's challenging housing targets. It is recognised that sites such as this need to be optimised in order to minimise encroachment into the Borough's Green Belt and protected SIL. It is considered that the social benefits, in both high-quality new housing stock and significant financial benefits carry significant weight in favour of the proposed development. Further economic and social benefits include employment during construction, as well as the continued and improved use of local services and facilities.
- 13.6 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, accords with the development plan as a whole. 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.
- 13.7 It is acknowledged and recognised throughout this report, that consideration of this proposal has involved finely balanced judgements. A balanced consideration of compromises is detailed in the report. The proposal represents a clear scale shift within Gilda Avenue, with some impacts on heritage and neighbouring amenity. These matters have been considered in detail below, and weighed against the primary public benefits of the scheme which 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 meaningful biodiversity enhancements and play spaces).



EXTENT OF PLANNING APPLICATION SITE

rev	date	description
0	11/05/2021	Extent of planning application site revised
	07/05/2020	PLANNING ISSUE



The Pump House 19 Hooper Street  
 London E1 8BU 020 7264 8600  
 info@stockwool.co.uk

Client  
**Origin Housing**

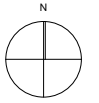
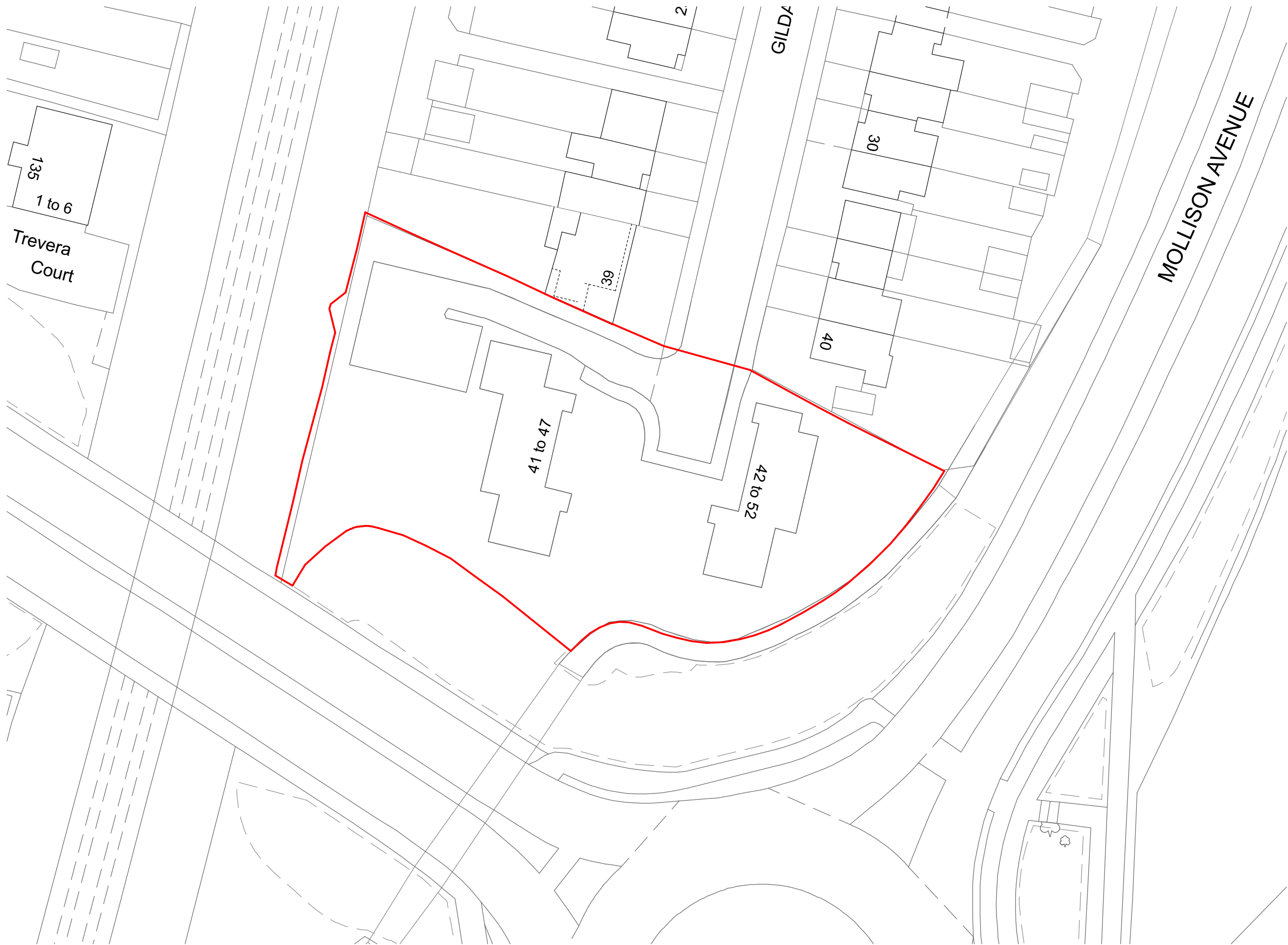
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**GILDA AVENUE**

Drawing  
**Site Location Plan**

Status  
**PLANNING**

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 Date  
 Drawn  
 Checked

Project no\_Drawing no\_Revision  
**3461\_PL(90)001\_0**



EXTENT OF PLANNING APPLICATION SITE

rev	date	description
A	11/05/2021	Extent of planning application site revised
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU Q20 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

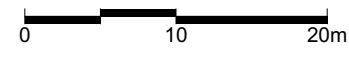
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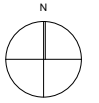
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Drawn  
Checked

Project no\_Drawing no\_Revision  
**3461\_PL(90)004\_A**





EXTENT OF PLANNING APPLICATION SITE

rev	date	description
A	11/05/2021	Extent of planning application site revised, Stepped connection to Mollison Avenue omitted
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

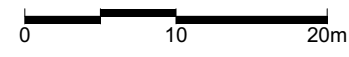
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Drawing  
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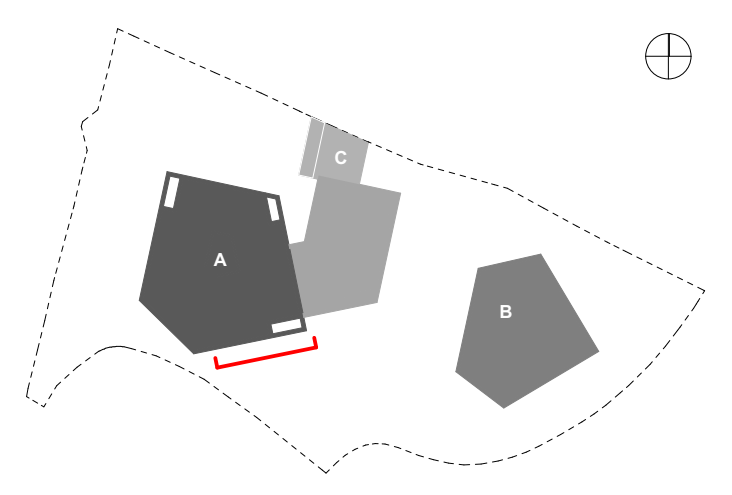
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Checked

Project no\_Drawing no\_Revision  
**3461\_PL(90)006\_A**







**Indicative Materials Keynote Legend**

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- 2 DARK RED BRICK
- 3 SOLDIER COURSE BRICKWORK
- 4 TINTED GRC BANDING TO MATCH BRICK COLOUR
- 5 TEXTURED BRICKWORK PROJECTING STACK BOND HEADER COURSE
- 6 PPC ANODIZED METALWORK (PANELS BETWEEN WINDOWS, RAL 6033 OR SIM)
- 7 ANGLED VERTICAL PATTERN RAILING WITH PPC ANODISED ALUMINIUM FASCIA
- 8 ANGLED VERTICAL PATTERN RAILING
- 9 VERTICAL BARS RAILING
- 10 GRC SOFFITS TO BALCONIES WITH GRC FASCIA
- 11 PAINTED CEMENT BOARD TO SOFFITS OF BALCONIES
- 12 PORCELAIN TILE RAISED DECKING TO BALCONIES
- 13 LOW WALL AND RAILINGS PROFILE TO MATCH BALUSTRADE
- 14 CYCLE STORE - PPC ALUMINIUM ROOF WITH HIT AND MISS HW TIMBER SLATS
- 15 PPC METAL SIGNAGE WITH SPACERS
- 16 PPC ALUMINIUM WINDOW (RAL 6033 OR SIMILAR)
- 17 ANGLED VERTICAL PATTERN PRIVACY SCREENS

rev	date	description
A	11/05/2021	Extent of planning application site revised
	07/05/2020	PLANNING ISSUE

**stock wool**  
 The Pump House 19 Hooper Street  
 London E1 8BU 020 7264 8600  
 info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Detailed Elevation Bay Studies - Block A**

Status  
**PLANNING**

Scale 1:50@A1 / 1:100@A3  
 CAD File 3461-MainModel  
 Date  
 Drawn  
 Checked

Project no\_Drawing no\_Revision  
 3461\_PL(40)101\_A

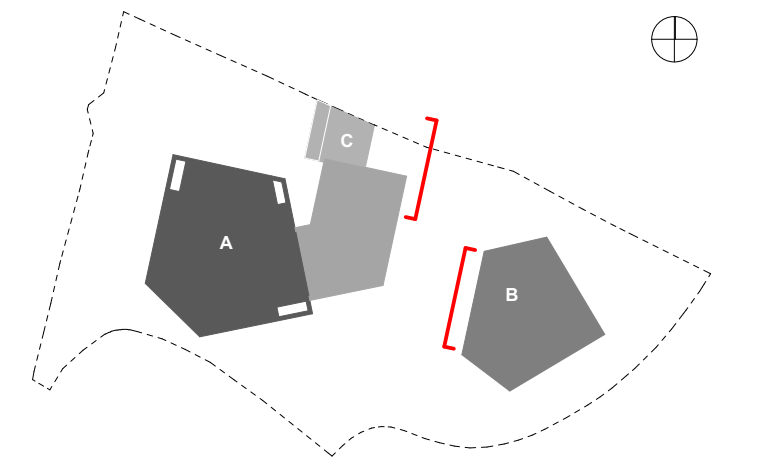


Section 1

South Elevation

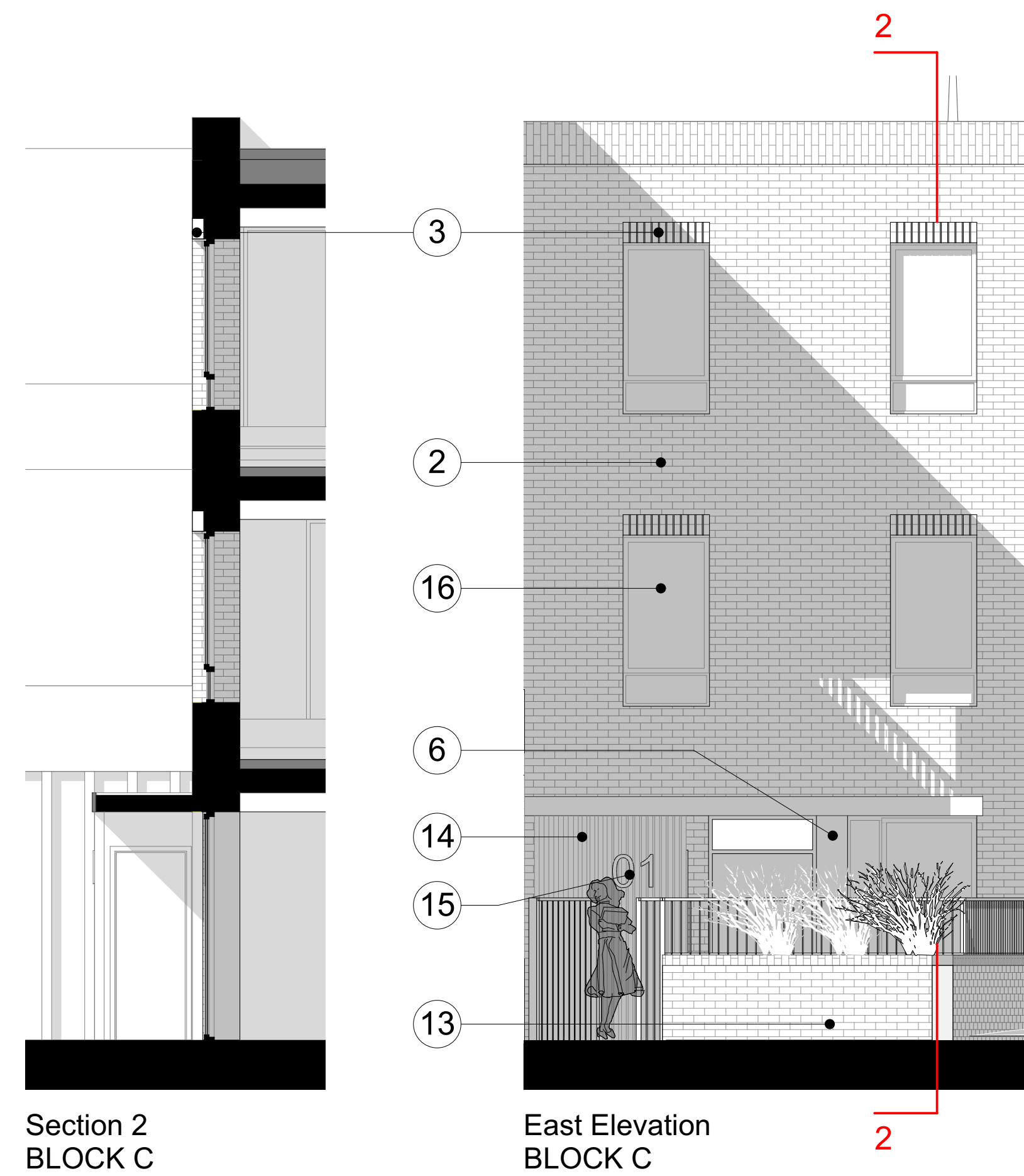
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- 2 DARK RED BRICK
- 3 SOLDIER COURSE BRICKWORK
- 4 TINTED GRC BANDING TO MATCH BRICK COLOUR
- 5 TEXTURED BRICKWORK PROJECTING STACK BOND HEADER COURSE
- 6 PPC ANODIZED METALWORK (PANELS BETWEEN WINDOWS, RAL 6033 OR SIM)
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- 8 ANGLED VERTICAL PATTERN RAILING
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- 16 PPC ALUMINIUM WINDOW (RAL 6033 OR SIMILAR)
- 17 ANGLED VERTICAL PATTERN PRIVACY SCREENS



Section 1  
BLOCK B

West Elevation  
BLOCK B



Section 2  
BLOCK C

East Elevation  
BLOCK C



rev	date	description
A	11/05/2021	Extent of planning application site revised
	07/05/2020	PLANNING ISSUE



The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
Origin Housing

Project  
GILDA AVENUE

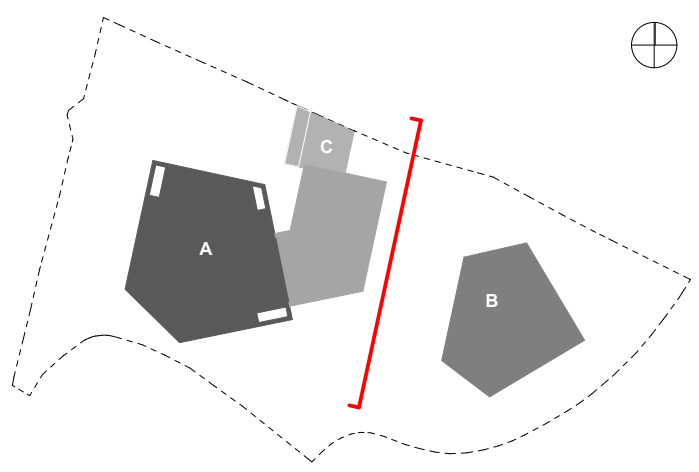
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CAD File 3461-MainModel  
Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(40)102\_A





- Obscure Glass
- Privacy Screen to Balcony



East Elevation

rev	date	description
A	11/05/2021	Car park gate amended to full height. Railings revised to be flush with outer edge of boundary wall below. Extent of planning application site revised
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
Origin Housing

Project  
GILDA AVENUE

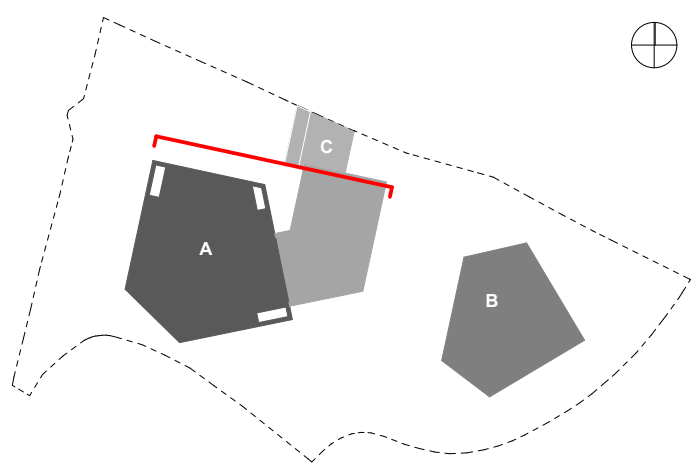
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Proposed East Elevation  
- Blocks A&C

Status  
PLANNING

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CAD File 3461-MainModel  
Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)301\_A





- Obscure Glass
- Privacy Screen to Balcony



North Elevation

A 11/05/2021 Railings revised to be flush with outer edge of boundary wall below, Communal courtyard gate revised to 1.8m high. Extent of planning application site revised  
 07/05/2020 PLANNING ISSUE

rev	date	description
A	11/05/2021	Railings revised to be flush with outer edge of boundary wall below, Communal courtyard gate revised to 1.8m high. Extent of planning application site revised
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
 London E1 8BU 020 7264 8600  
 info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

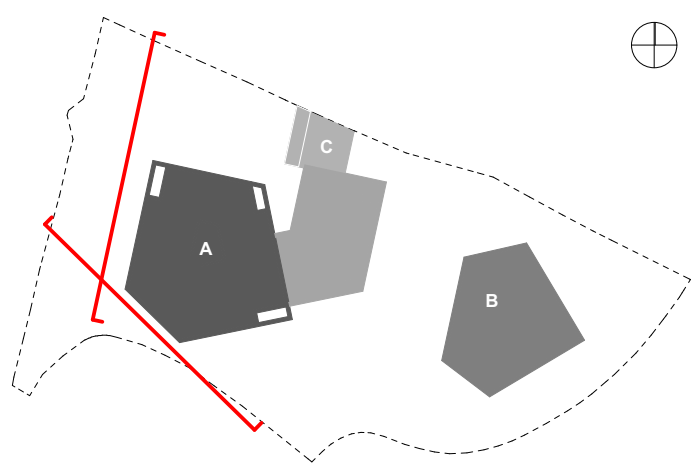
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Status  
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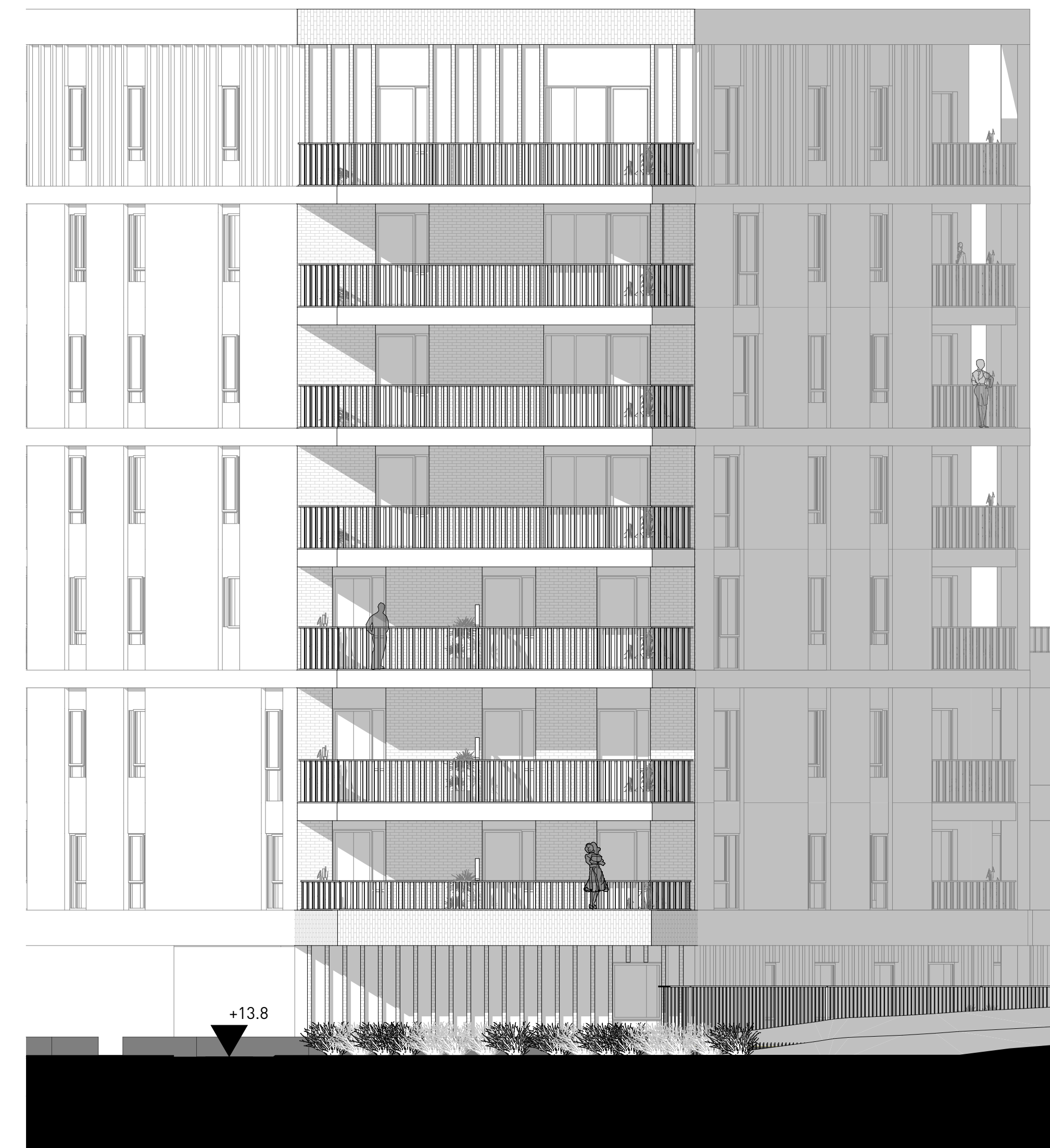




- Obscure Glass
- Privacy Screen to Balcony



West Elevation



South West Elevation

rev	date	description
A	11/05/2021	Car park gate amended to full height, Extent of planning application site revised
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

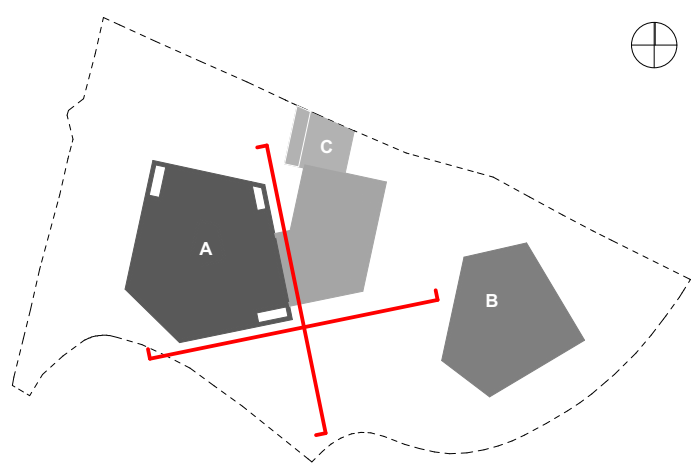
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Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)303\_A





- Obscure Glass
- Privacy Screen to Balcony



South East Elevation



North East Elevation

rev	date	description
A	11/05/2021	Railings revised to be flush with outer edge of boundary wall below, Communal courtyard gate revised to 1.8m high, Extent of planning application site revised
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
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Client  
**Origin Housing**

Project  
**GILDA AVENUE**

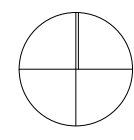
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**Proposed South East & North East Elevations - Block A**

Status  
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CAD File 3461-MainModel  
Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)304\_A





- PROPOSED TREES
- EXISTING TREES



A	11/05/2021	Maintenance access gate increased at 2.4m high. Car park gate amended to full height. Railings revised to be flush with outer edge of boundary wall below. Stepped connection to Mollison Avenue omitted. Parking layout revised
	07/05/2020	PLANNING ISSUE
rev	date	description



The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Proposed Ground Floor**

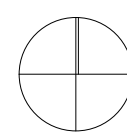
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Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)100\_A







rev	date	description
A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE

**stock wool**  
 The Pump House 19 Hooper Street  
 London E1 8BU 020 7264 8600  
 info@stockwool.co.uk

Client  
**Origin Housing**

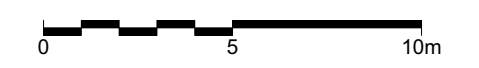
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**GILDA AVENUE**

Drawing  
**Proposed First Floor**

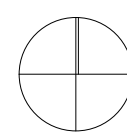
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 Checked

Project no\_Drawing no\_Revision  
**3461\_PL(20)101\_A**







rev	date	description
A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Proposed Second Floor**

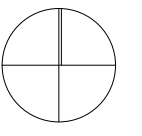
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Project no\_Drawing no\_Revision  
3461\_PL(20)102\_A







GREEN ROOF



rev	date	description
A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE



The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Proposed Third Floor**

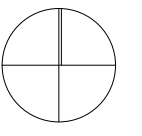
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Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)103\_A







GREEN ROOF



A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE

rev	date	description
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**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Proposed Fourth Floor**

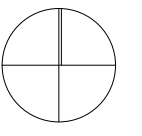
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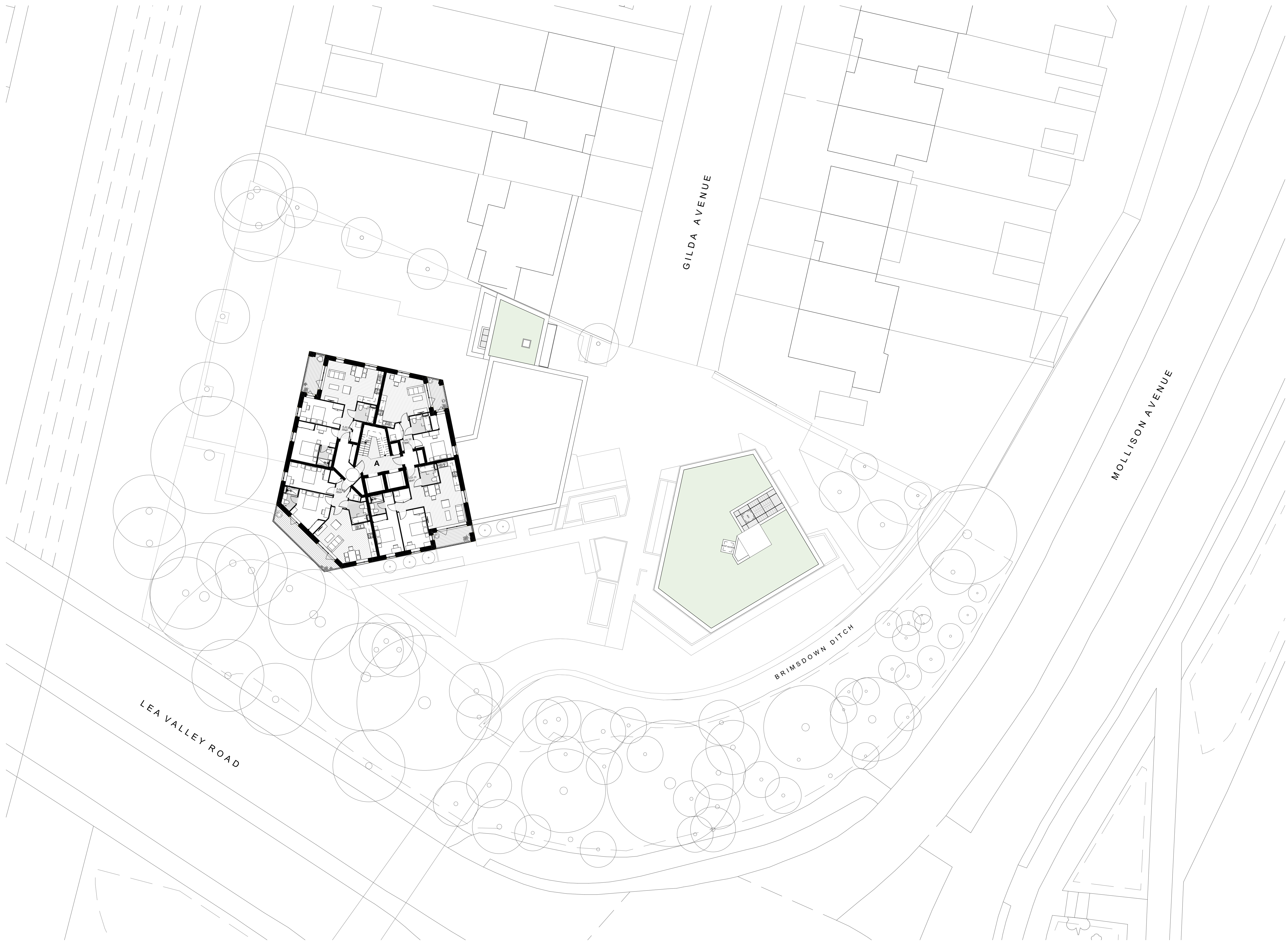
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**3461\_PL(20)104\_A**







GREEN ROOF



A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE

rev	date	description
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The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

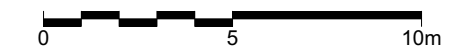
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Drawing  
**Proposed Fifth Floor**

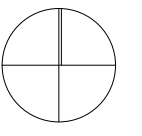
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Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)105\_A







GREEN ROOF



A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE

rev	date	description
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The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Proposed Sixth Floor**

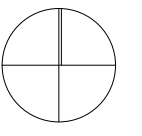
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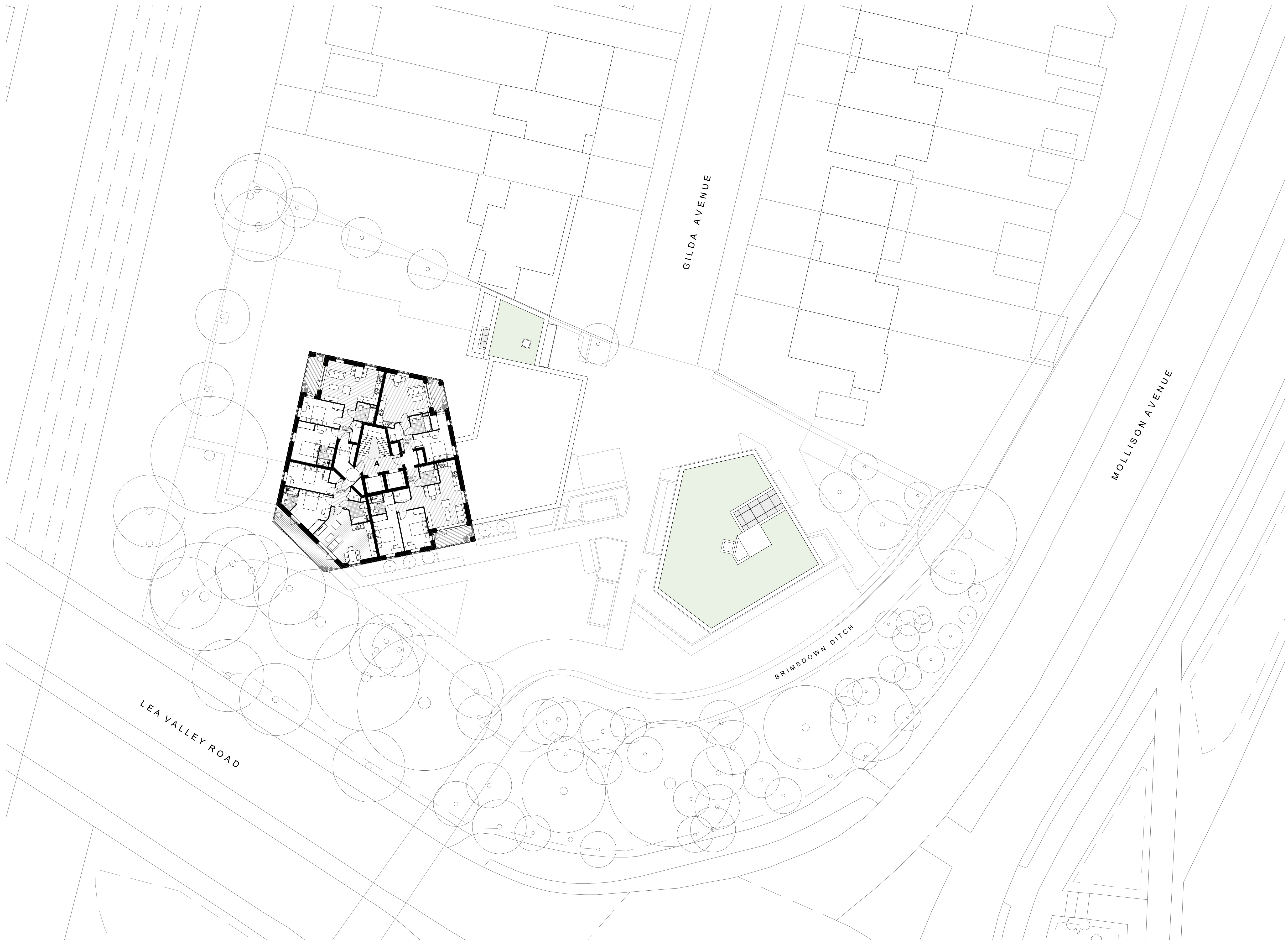
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**3461\_PL(20)106\_A**







GREEN ROOF



A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE

rev	date	description
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The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Proposed Seventh Floor**

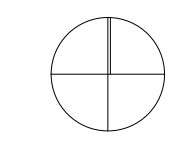
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Date  
Drawn  
Checked

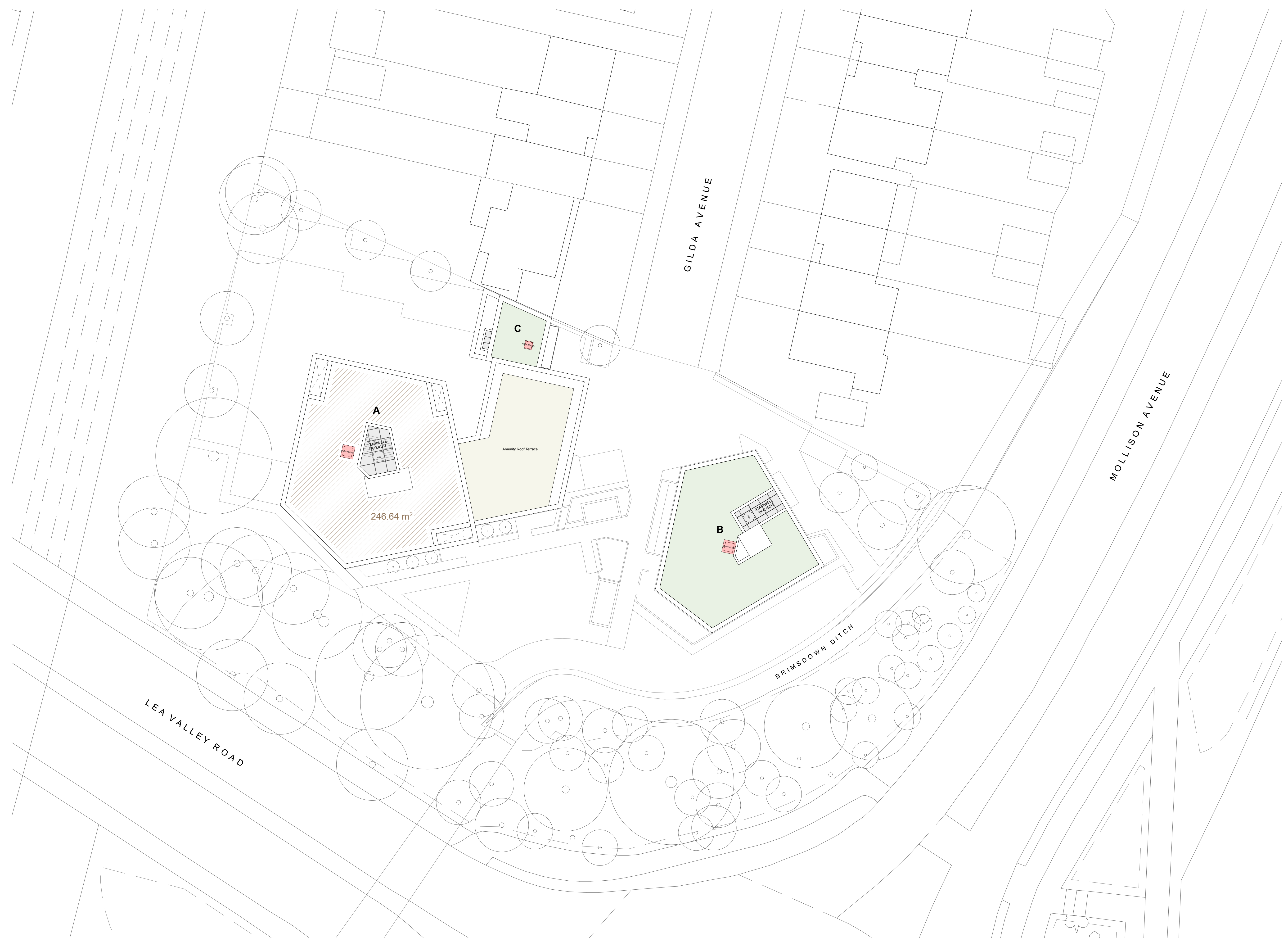
Project no\_Drawing no\_Revision  
3461\_PL(20)107\_A







- GREEN ROOF
- ROOF WITH PVs  
Please refer to Energy Strategy Report for details.
- ROOF TERRACE
- ROOF ACCESS



rev	date	description
A	11/05/2021	Stepped connection to Mollison Avenue omitted, Parking layout revised
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

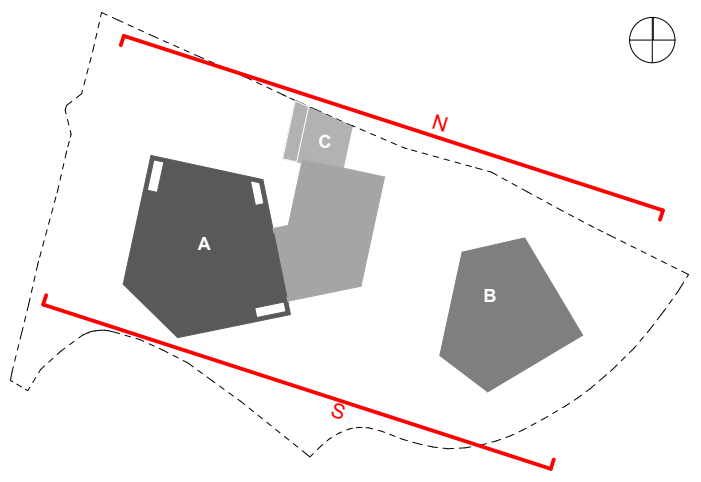
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**Proposed Roof Plan**

Status  
**PLANNING**

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Date  
Drawn  
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Project no\_Drawing no\_Revision  
3461\_PL(20)108\_A

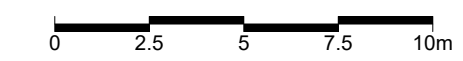




North Elevation



South Elevation



Page 238

rev	date	description
A	11/05/2021	Maintenance access gate increased at 2.4m high. Railings revised to be flush with outer edge of boundary wall below. Communal courtyard gate revised to 1.8m high. Extent of planning application site revised. Stepped connection to Mollison Avenue omitted.
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

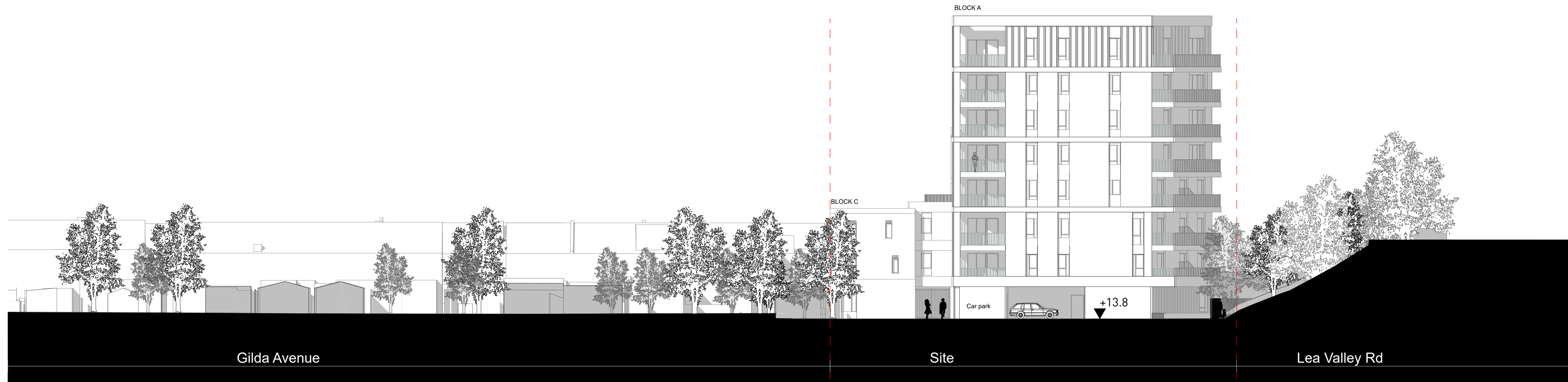
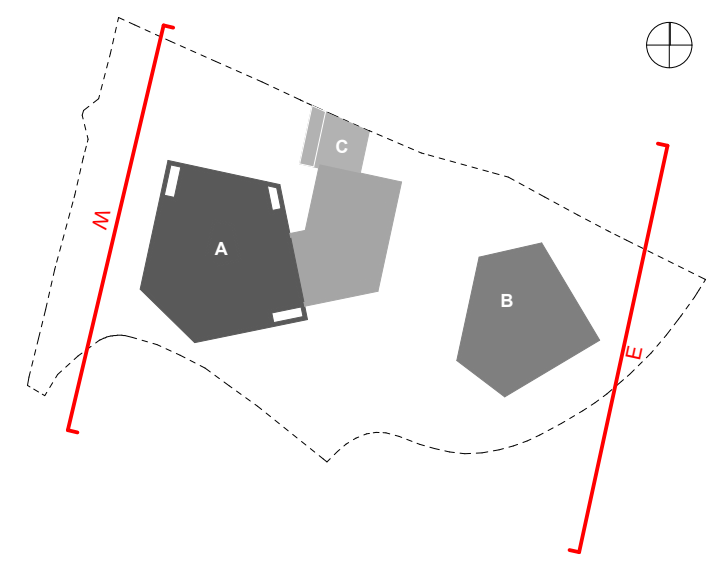
Drawing  
**Proposed Site Elevations - North & South**

Status  
**PLANNING**

Scale 1:200@A1/1:400@A3  
CAD File 3461-MainModel  
Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)202\_A





West Elevation



East Elevation - Mollison Avenue



rev	date	description
A	11/05/2021	Maintenance access gate increased at 2.4m high, Car park gate amended to full height. Extent of planning application site revised, Stepped connection to Mollison Avenue omitted
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

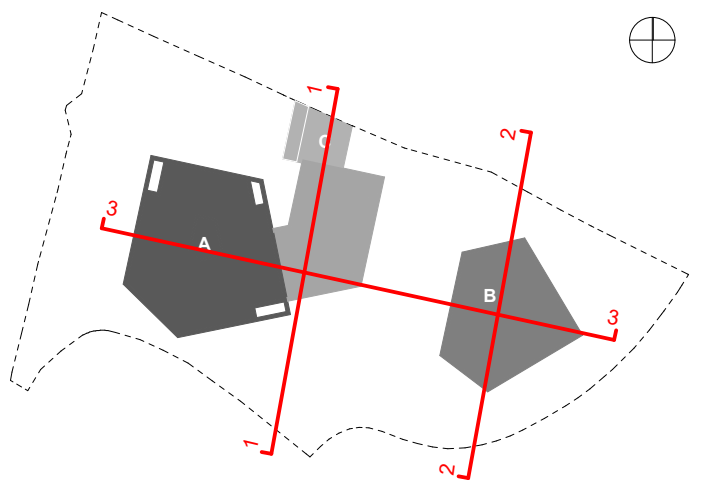
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**Proposed Site Elevations - East & West**

Status  
**PLANNING**

Scale 1:200@A1/1:400@A3  
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Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)203\_A

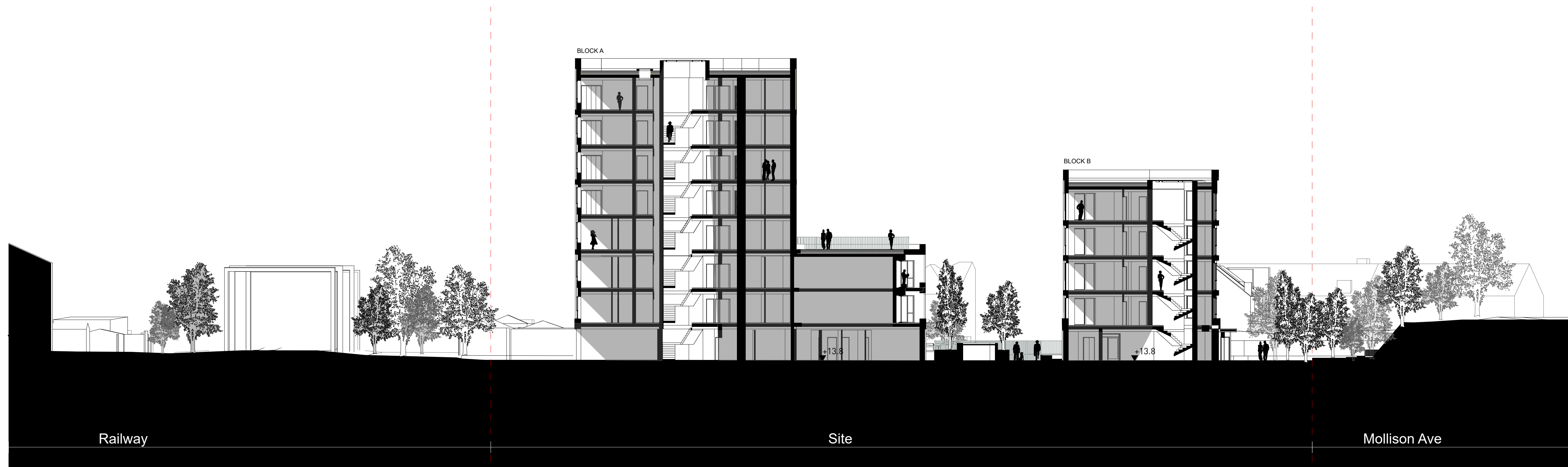




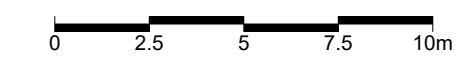
Section 1



Section 2



Section 3



rev	date	description
A	11/05/2021	Railings revised to be flush with outer edge of boundary wall below, Extent of planning application site revised, Stepped connection to Mollison Avenue omitted
	07/05/2020	PLANNING ISSUE

**stock wool**  
 The Pump House 19 Hooper Street  
 London E1 8BU 020 7264 8600  
 info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

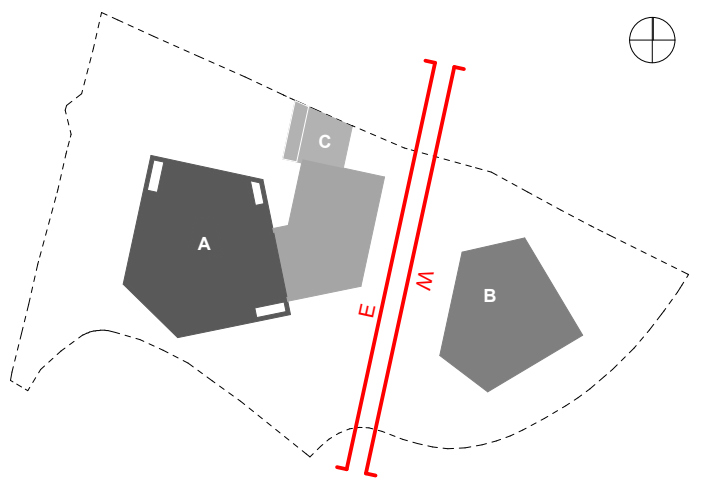
Drawing  
**Proposed Site Sections**

Status  
**PLANNING**

Scale 1:200@A1/1:400@A3  
 CAD File 3461-MainModel  
 Date  
 Drawn  
 Checked

Project no\_Drawing no\_Revision  
 3461\_PL(20)204\_A





Gilda Avenue - East Elevation



Gilda Avenue - West Elevation



rev	date	description
A	11/05/2021	Car park gate amended to full height, Railings revised to be flush with outer edge of boundary wall below, Extent of planning application site revised, Stepped connection to Mollison Avenue omitted
	07/05/2020	PLANNING ISSUE



The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

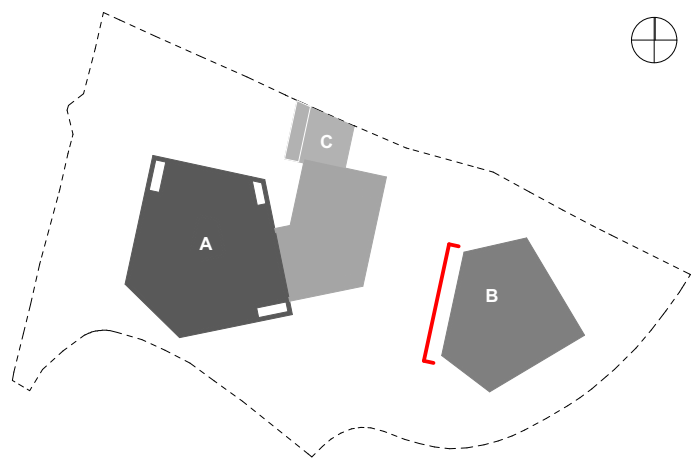
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**Proposed Site Elevations - Gilda Avenue East & West**

Status  
**PLANNING**

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CAD File 3461-MainModel  
Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
3461\_PL(20)201\_A





- Obscure Glass
- Privacy Screen to Balcony



West Elevation

rev	date	description
A	11/05/2021	Railings revised to be flush with outer edge of boundary wall below, Extent of planning application site revised, Stepped connection to Mollison Avenue omitted
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
 London E1 8BU 020 7264 8600  
 info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

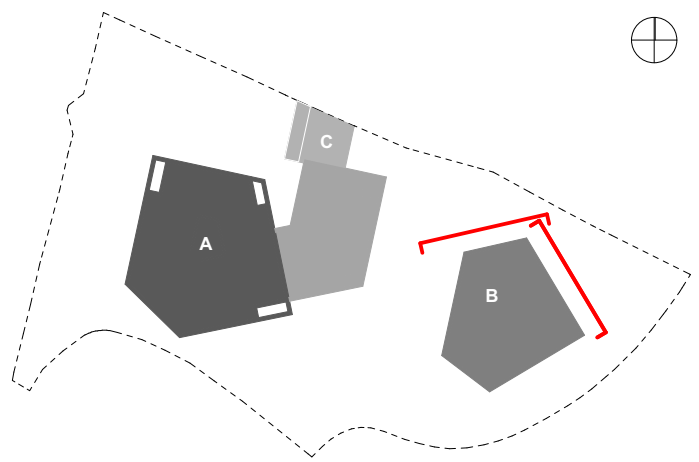
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**Proposed West Elevation - Block B**

Status  
**PLANNING**

Scale 1:100@A1/1:200@A3  
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 Date  
 Drawn  
 Checked

Project no\_Drawing no\_Revision  
 3461\_PL(20)401\_A

Any errors and omissions to be reported to the Architect prior to commencement. Dimensions and areas are based on survey information provided by the client. This drawing is copyright © STOCKWOOL. All dimensions to be checked on site. Do not scale.



- Obscure Glass
- Privacy Screen to Balcony



North East Elevation



North Elevation

rev	date	description
A	11/05/2021	Maintenance access gate increased at 2.4m high. Railings revised to be flush with outer edge of boundary wall below. Communal courtyard gate revised to 1.8m high. Extent of planning application site revised. Stepped connection to Mollison Avenue omitted.
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

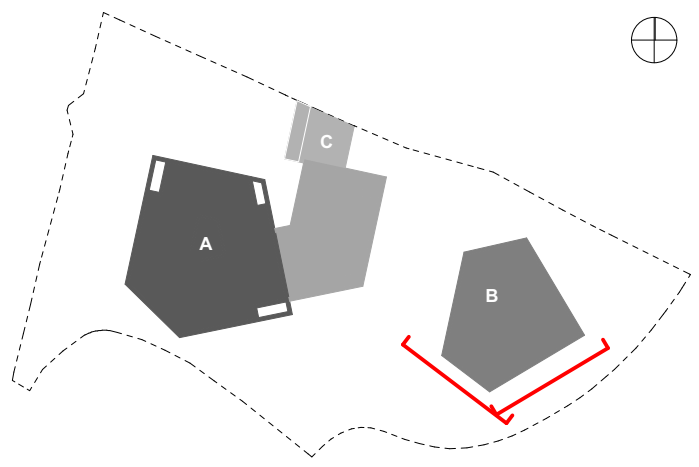
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**Proposed North & North East Elevation - Block B**

Status  
**PLANNING**

Scale 1:100@A1/1:200@A3  
CAD File 3461-MainModel  
Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
**3461\_PL(20)402\_A**





- Obscure Glass
- Privacy Screen to Balcony



South West Elevation



South East Elevation

rev	date	description
A	11/05/2021	Maintenance access gate increased at 2.4m high. Railings revised to be flush with outer edge of boundary wall below. Communal courtyard gate revised to 1.8m high. Extent of planning application site revised. Stepped connection to Mollison Avenue omitted
	07/05/2020	PLANNING ISSUE

**stock wool**

The Pump House 19 Hooper Street  
London E1 8BU 020 7264 8600  
info@stockwool.co.uk

Client  
**Origin Housing**

Project  
**GILDA AVENUE**

Drawing  
**Proposed Southeast & Southwest Elevation - Block B**

Status  
**PLANNING**

Scale 1:100@A1/1:200@A3  
CAD File 3461-MainModel  
Date  
Drawn  
Checked

Project no\_Drawing no\_Revision  
**3461\_PL(20)403\_A**



## LONDON BOROUGH OF ENFIELD

### PLANNING COMMITTEE

**Date:** 28<sup>th</sup> September 2022

**Report of**  
Head of Planning  
- Vincent Lacovara

**Contact Officer:**  
Sharon Davidson  
Jacob Ripper

**Wards:**  
Upper Edmonton,  
Edmonton Green,  
Lower Edmonton,  
Jubilee,  
Ponders End,  
Southbury,  
Carterhatch

**Ref:** 22/00047/FUL

**Category:** Full Planning Application

**LOCATION:** Enfield District Heat Network Between Southbury Road EN1 Hertford Road And St Martins Road N9.

**PROPOSAL:** Phase 1 of new 23km Borough-wide district heating distribution network in Enfield comprising at this stage pipework of approximately 7km in length.

**Applicant Name & Address:**

Energetik (Lee Valley Heat Network Operating Company Ltd)  
B Block North  
Civic Centre  
Silver Street  
Enfield  
EN1 3XA

**Agent Name & Address:**

David Kemp  
DRK Planning Ltd  
215 Alfred Court  
53 Fortune Green Road  
West Hampstead  
NW6 1DF

**RECOMMENDATION:**

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



**Ref:** 22/00047/FUL **LOCATION:** Enfield District Heat Network, Between Southbury Road  
EN1, Hertford Road And , St Martins Road



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Scale 1:50000

North



**1. Note for Members**

- 1.1 The application is reported to the Planning Committee because it is classified as a major development. In addition, the applicant for the development is closely associated with Enfield Council and in accordance with the scheme of delegation, is reported to the Planning Committee for determination.

**2. Recommendation:**

- 2.1 In accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, the Head of Development Management/the Planning Decisions Manager be authorised to **GRANT full planning permission subject to planning conditions.**

1. Limited Time Period Permission

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

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

2. Approved Plans

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

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

3. Written Scheme of Investigation

No demolition or development within an individual development zone or section shall take place until a written scheme of investigation (WSI) for that development zone or section has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting

material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

4. Air Quality

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>

Reasons: In the interests of good air quality with regard to London Plan (2021).

5. Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.

Reason: To protect against risks arising from contamination

6. Tree Replacement

That within one year of completion of construction works for any individual development zone or section; the number of trees removed within that development zone or section shall be planted of a standard size in accordance with Arboricultural good practice in place of the total number of trees to be removed within that development or section and at locations to be agreed in writing by the Local Planning Authority before planting. Such trees shall be replaced with ones of similar size and type should they die within five years of planting. The overall number of replacement trees throughout the scheme shall be no less than 13.

Reason: To secure suitable replacement planting and to maintain the Borough's stock of amenity trees, in alignment with Policy DMD 80.

7. River Culverts

No works approved by this application within an individual development zone or section shall commence until a detailed condition survey is undertaken of any main river culverts where the proposed pipework crosses or passes within 8 meters. The survey(s) will be submitted to, and approved by, the local planning authority in consultation with the Environment Agency.

Details of any improvement works shall be included along with proposed timings. Any required maintenance or replacement of the culverts will need to be undertaken prior to construction of any heat network infrastructure within 8 meters of a main river.

Reason: The current condition of the culverts is unknown and could be impacted by the proposed construction works. A collapse of a culvert can cause considerable flooding to the area. To prevent this, the applicant must demonstrate the current condition of the culvert and any improvement works required to ensure the structural integrity will not be compromised.

8. Construction Environmental Management Plan

No development shall take place within an individual development zone or section (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To minimise impacts on biodiversity in accordance with Paragraphs 179 and 180 of the NPPF.

- 2.2 That the Head of Development Management be granted delegated authority to agree the final wording of these conditions prior to the issue of the decision notice.

3. **Executive Summary:**

- 3.1 The application site spans across a large area of the south-eastern and eastern portion of the Borough. The application seeks approval for the first phase of a new decentralised energy network that will eventually cover large areas of the London Borough of Enfield and some areas of neighbouring London Boroughs.
- 3.2 The installation of the network constitutes engineering works requiring planning permission. However, the majority of the network is located beneath the highway and works cannot take place until all details, including traffic management arrangements during construction have been agreed by the Council in its capacity as highway and street works authority.
- 3.3 Decentralised energy networks are encouraged and supported in local, regional, and national planning policies and major developments are required to connect to existing or planned energy networks whenever possible. Several major developments within the Borough have already installed or are installing the equipment and infrastructure necessary to connect to the subject energy network.
- 3.4 This first phase is approximately 7km in length and extends from the Meridian Water/Edmonton area in the south of the Borough towards the north. There will be three phases following this phase to complete the total 23km pipeline network. Although Phase 1 does not contain individual development “phases”, the applicant has provided drawings showing 3 development zones with sections of work to commence within each zone, and many of them will happen concurrently.
- 3.5 The Energetik/Lee Valley Heat Network is supplied with energy from the adjacent EcoPark/North London Heat and Power Project facility to the north, which generates energy from waste.
- 3.6 The primary reasons for recommending approval are:
  - The development and expansion of low carbon decentralised energy networks is strongly supported throughout all levels of planning policy.
  - The development would extend part of the decentralised energy network, which is both encouraged and required by local and regional plans and policies and enables the wider delivery of actual service to progress. It will facilitate further expansion of the network as well, allowing development in the future to benefit from connecting to the network.
  - The development complies with relevant planning policy where identified in this report, or compliance can be ensured through the use of planning conditions that have been proposed.
- 3.7 The proposal is considered acceptable in particular having regard to Policies GG1, SI2, and SI3 of the London Plan, Policy CP20 of the Core Strategy and Policies 51 and 52 of the Development Management Document.

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



- 4.1. The subject site spans across several wards and is approximately 7km in length. The vast majority of the piping will be located within the public highway, buried under road and pedestrian surfaces. Other portions of the piping will extend through Kenninghall Open Space and along a cycle path. The applicant states that once the piping is placed underground, the surfaces will be reinstated and the areas it passes through will look no different, with the exception of some access covers along the route where the pipes change direction.
- 4.2. The following two figures depict the proposed route:

[see next pages]

Figure 1 – Beginning near Meridian Water in the south and running north

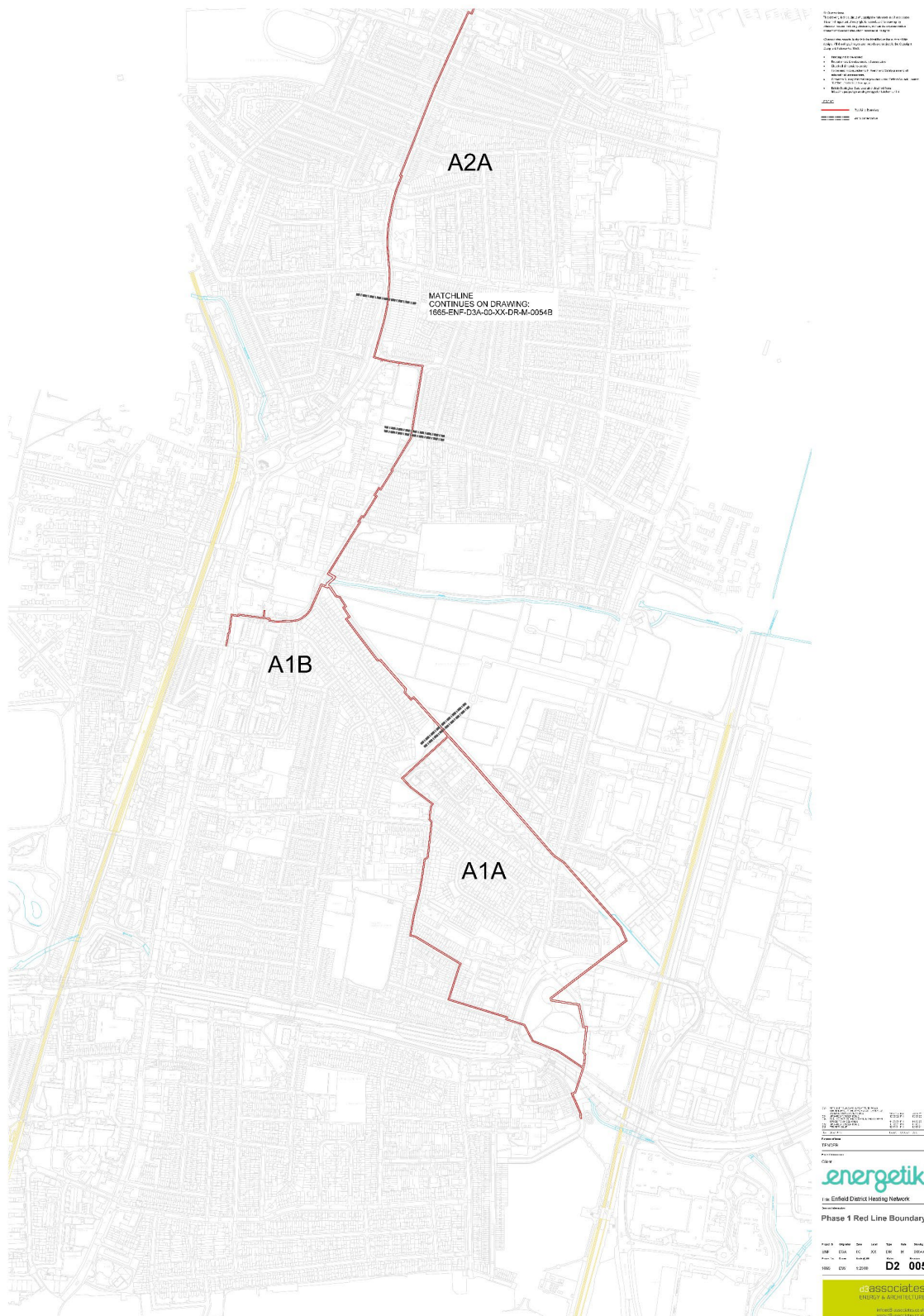


Figure 2 – Continuing north from proceeding drawing



- 4.3. The route passes through areas containing industrial, commercial, residential, and public uses. It will pass by or near four conservation areas, although will not impact built (above-ground) heritage assets. As most of the construction works will occur within carriageways, a detailed traffic management proposal and plans have been submitted.

## 5. Relevant Planning History:

- 5.1 The following is the primary planning application associated with the subject proposal.

Reference	Description	Decision	Date
18/04517/FUL	Construction of a new district heating energy centre building and phase 1 of the associated buried heat network piping which extends westward into the wider borough.	S106 Granted with Conditions	11 January 2021
<p>Officer Note: This was an application for Energetik's operational hub for the decentralised energy network pipes and an extension of the piping to Meridian Water. This was also called phase 1 but was specific to an extension to Meridian Water.</p> <p>The energy centre building is located at 4 Advent Way, to the north of the North Circular Road.</p>			

- 5.2 The following are similar, albeit smaller scale applications to extend piping to connect to various developments, in anticipation of the full decentralised energy network being built out.

Reference	Description	Decision	Date
19/02282/FUL	Installation of district heating pipework.	Granted with Conditions	24 October 2019
<p>Officer Note: This was an application to install connecting pipework between Alma Estate and the Electric Quarter for future connection to the wider decentralised energy network.</p>			
21/02036/FUL	Installation of district heating pipework and all associated works including pipework and connections on external elevations of properties	Granted with Conditions	39 July 2021
<p>Officer Note: This application was associated with properties along Naylor Grove, EN3.</p>			
21/02587/FUL	Installation of district heating pipework and all associated works including pipework and connections on external elevations of properties.	Granted with Conditions	16 September 2021

Officer Note: This application was associated with properties along South Street, EN3.			
22/00013/RE4	Extension of Ponders End Heat Network to supply low carbon heat to the Swan Annexe.	Granted with Conditions	17 March 2022
Officer Note: This application was associated with properties at Swan Annexe, adjacent to High Street, Ponders End.			

## 6 Consultations

### Public

- 6.1. Extensive use of site notice signs was used to publicise this application given the route primarily runs through public highway. In all, approximately 27 notices were placed at key locations along the route and in visible areas such as junctions, paths, open spaces, etc.
- 6.2. During the review process, the applicant stated it was necessary to modify the portion of the route going through and near the Kenninghall Open Space. Due to this, it was determined that statutory and non-statutory consultees be re-consulted. In addition, due to the redline of the application shifting towards (but not through) the corner of the rear garden of one dwelling, that property was directly notified with a letter. Overall, the extended period to receive comments due to the modification expired 31 July 2022.
- 6.3. No representations from the public were received.

### Statutory and Non-Statutory Consultees:

#### Internal

- 6.4. Ecology:

No objection subject to inclusion of a recommended condition.

- 6.5. Environmental Health:

Environmental Health does not object to the application for planning permission as there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality or noise.

Officer Note: The Officer requested standard conditions associated with contamination and non-road mobile machinery. The requested conditions have been included in this report.

- 6.6. Street Works:



Prior to any works taking place on the highway, the applicant will need to enter into a series of licences granted pursuant to Section 50 of the New Roads and Street Works Act 1991. This is a legal requirement, necessary to enable the apparatus to be placed in the highway and subsequently maintained. Various conditions will be attached to the licence relating to the reinstatement of the highway, public safety and to minimise inconvenience as far as practicable.

Detailed traffic management arrangements for the project will need to be agreed with the Street Works team as part of the process of granting the Section 50 licences. This will be completed once a contractor has been appointed and a method of work agreed. Other stakeholders will need to be involved with the design the final traffic management arrangements (including bus operators, Transport for London and the emergency services). The various traffic management documents supplied with the planning application are indicative only and do not represent the agreed, final traffic management arrangements.

The Traffic Management Act 2004 places a duty on traffic authorities to manage their road network with a view to achieving (as far as practicable) the 'expeditious movement of traffic' on their own and other networks. The work will therefore need to be co-ordinated with other street works and temporary traffic management arrangements put in place to minimise disruption as much as possible. The Council also has powers to levy charges if the road works exceed agreed timescales.

6.7. Highway Services – Street Trees:

Initial concerns regarding removal of trees. The applicant reduced the number of trees to be removed and no further objection was received.

6.8. SuDS:

Requested that the applicant engage with highway services to determine where additional or improved rain gardens could be installed along the route. No objection.

6.9. Transportation:

The installation of the energy network will have a significant and prolonged impact on a number of key traffic routes, including the A1010 Herford Road between Edmonton Green and Ponders End. This forms part of London's Strategic Road Network, serving as an important traffic and bus route. Although temporary traffic management arrangements will be put in place, the works will inevitably lead to delays on the road network, impacting both local bus services and general traffic.

External

6.10. Cadent Gas:

No objection.

6.11. Environment Agency:

Expressed concerns about the condition of river culverts and raised no objection subject to a recommended condition be included.

6.12. Historic England (GLAAS):

The planning application is not in an area of archaeological interest.

The consultee agreed with the conclusions of the submitted desk-based archaeological assessment and support the proposed archaeological watching brief on development groundworks by condition.

Officer Note: The requested condition has been included in this report.

6.13. Natural England:

No objection.

6.14. Network Rail:

Recommended approval.

Officer Note: Some issues relating to the construction process were raised, , notwithstanding recommending approval. These have been forwarded to the applicant, and it is understood that the applicant has engaged in discussions with Network Rail. The concerns included potential impacts or damage to railway infrastructure and assets due to construction activities. This is a practical matter for the applicant to resolve directly with Network Rail is not material to the consideration of the planning application

6.15. Thames Water:

No comments received.

6.16. Transport for London:

No comments received.

## 7. **Relevant Policies**

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.

7.1. London Plan (2021)

The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of

London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:

GG6: Increasing efficiency and resilience  
D4: Delivering good design  
HC1: Heritage conservation and growth  
G7: Trees and woodlands  
SI 1: Improving air quality  
SI 2: Minimising greenhouse gas emissions  
SI 3: Energy infrastructure  
T1: Strategic approach to transport

7.2. 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 20: Sustainable Energy Use and Energy Infrastructure  
CP 30: Maintaining and Improving the Quality of the Built and Open Environment  
CP 31: Built and Landscape Heritage

7.3. 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 37: Achieving High Quality and Design-Led Development  
DMD 44: Conserving and Enhancing Heritage Assets  
DMD 51: Energy Efficiency Standards  
DMD 52: Decentralised Energy Networks  
DMD 80: Trees on Development Sites

7.4. Edmonton Leaside Area Action Plan (2020)

The Edmonton Leaside Area Action Plan (ELAAP) was adopted by Enfield Council on 29 January 2020. The plan is now part of the development plan, and planning decisions within the Edmonton Leaside area must be taken in line with the plan, subject to other material considerations. The following area action plan policies are considered particularly relevant:

EL17: Redevelopment of the EcoPark Site  
EL26: The Meridian Water Heat Network

7.5. Other relevant Policy/Guidance

National Planning Policy Framework (NPPF)  
National Planning Practice Guidance (NPPG)  
Decentralised Energy Network Technical Specification SPD (2015)

## **8. Analysis**

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

- Principle of the development
- Environmental health
- Transportation and highways
- Trees
- Sustainable drainage
- Design, heritage and archaeology

### 8.2. Principle of Development

8.2.1. The principle of installing and strategically expanding decentralised energy networks and associated infrastructure is fully supported and encouraged by policy DMD 52 of the Enfield Development Management Document (2014) and CP 20 of the Enfield Core Strategy (2010), as well as the Enfield Decentralised Energy Network Technical Specification Supplementary Planning Document (2015). The National Planning Policy Framework and policy SI3 of the London Plan (2021) further reinforce the support for decentralised energy networks.

8.2.2. Decentralised energy networks generate energy at the point of distribution, in this case an existing energy from waste facility that is currently being replaced and upgraded with modernised technology and methods. Power and/or heat is then distributed in a network of underground pipelines.

8.2.3. Policies DMD 51 and DMD 52 require new developments to connect to decentralised networks if nearby, contribute towards extensions of the network if feasible to do so, or if the network does not yet exist but is planned then to commit to connect to the network in the future when available.

8.2.4. As a source of low-carbon energy, the proposed extension of the network to serve a wider area and more users is fully supported by national, regional, and local policy. Therefore, the proposed development is wholly supported in principle and actively encouraged by Enfield Council plans and policies.

### 8.3. Environmental Health

*Air Quality*

- 8.3.1. Policy SI 1 of the London Plan (2021) requires that development proposals control, and where possible improve, air quality within London. In consultation with the Council's Environmental Health Officer it was noted that non-road mobile machinery must comply with the GLA's supplementary planning guidance Control of Dust and Emissions During Construction and Demolition (2014) to control dust during construction works. Compliance with this requirement can be ensured by a condition.

#### *Contamination*

- 8.3.2. The applicant submitted a land contamination report outlining how to avoid risk to the environment and human health if contamination is discovered. The Environmental Health Officer recommend conditions to protect air quality and measures to be taken should unexpected contamination be discovered.
- 8.3.3. As conditioned, it is considered that the proposal will not negatively impact the environment in the context of air quality and contamination.

#### 8.4. Transportation and Highways

- 8.4.1. The vast majority of the proposed pipe network will be located within the public highway. In addition to requiring planning permission, the new apparatus will therefore require licensing pursuant to Section 50 of the New Roads and Street Works Act 1991. As part of the licensing process temporary traffic management measures will need to be agreed and put in place to ensure the safety of both operatives and road users.
- 8.4.2. The Council's Street Works team noted that once a contractor is appointed the detailed traffic management arrangements will be designed in conjunction with key stakeholders, including TfL and the emergency services. In addition, the applicant will be required to engage with residents and businesses along the affected route.
- 8.4.3. Despite the traffic management arrangements, it is clear that implementation of the works will have a significant and prolonged impact on traffic conditions along the A1010 corridor and elsewhere. Whilst this is not in itself a planning consideration, it should be noted that the Street Works team will work with the applicant to reduce the impact as much as possible. This may include the application of necessary conditions to any section 50 licences in order to minimise any adverse impact to the operation of the highway network.

#### 8.5. Trees

- 8.5.1. Policy DMD 80 states development that involves the loss of or harm to trees protected by a TPO or trees of significant amenity or biodiversity value will be resisted. There is one TPO tree (T57) adjacent to the identified route, which has not been identified for removal. An Arboricultural Impact Assessment (AIA) has been submitted by the applicant. The AIA includes survey data, survey methods,



tree constraints plans, tree works plans, tree protection plans, and tree protection fencing specifications.

- 8.5.2. The proposal includes the removal or partial removal of 8 individual trees and 7 tree groups, as noted in the table below from the submitted AIA. The identified trees are required for removal due to the trenching required for the installation of the pipework and the location of the pipework. Efforts have been made by the applicant to avoid all Category A and B trees and minimise impacts to all other trees.

	Trees	Groups	Woodland	Hedgerow
Remove (on-site)	T39; T41; T66; T70 T182; T192; T193; T214	(G1); G13 (G25); (G29); (G33); (G34); (G35)*	-	-
Remove (off-site)	-	-	-	-

(Features in brackets are those of which a part would be removed and part retained)

- 8.5.3. Class A and B trees are generally worth conserving, however, if they are removed, DMD 80 requires adequate replacements to be provided.
- 8.5.4. The table below describes the distribution of trees identified for removal or possible removal in each category:

Feature	Number of features affected				
	Category A	Category B	Category C	Category U	Hedges
Trees	0	2	4	2	0
Groups	0	2	5	0	
Woodland	0	0	0	0	
Total loss	0.00000a	0.1492ha	0.0588ha	0.0023ha	0m
Proportion of existing	00.00%	5.50%	7.65%	100%	0%

- 8.5.5. The majority of trees to be removed are moderate (B) and low quality (C) trees, with 2 designated as unsuitable for retention (U). Due to the strategic location of piping locations and the location of the identified trees, it is considered the removal of the 4 Category B and 9 Category C trees and tree groups is warranted. However,

as required by policy, these trees must be replaced with suitable trees on the site. This is supported in the proposed mitigation measures within the submitted AIA. A condition will require a detailed plan for replacement of these trees.

8.5.6. The Council's Tree Officer was consulted and raised no objection to the removal of these trees.

8.5.7. Trees to be retained must also be protected from any works occurring on site. This will be ensured by the applicant following the Tree Protection Plan submitted as part of the approved AIA.

#### 8.6. Drainage and Flooding

8.6.1. 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.

8.6.2. The proposed development is an underground infrastructure project involving enclosed pipes, so is dissimilar to a typical above-ground development that the relevant policies address. Hard surfacing will be removed to install the pipes and reinstated in the roadways, offering little need to improve drainage along the route.

8.6.3. The Council's SuDS team submitted comments noting that the developer must not negatively impact any existing rain gardens that may exist along the route. The applicant has stated that none of the proposed route goes through any rain gardens, by design. The SuDS team at minimum requested that a method statement be submitted by the applicant in the case a rain garden is encountered, which has been provided.

8.6.4. The SuDS team also noted that there may be opportunity to deliver new rain gardens when doing works. It is noted that this is outside of the scope of this planning application, but as part of the local Highways Authority, the SuDS team would be eager to work with the developers in identifying opportunities.

8.6.5. In addition, the SuDS team noted that the works involve installing pipes under watercourses and culverts. The applicant noted:

*We will be building our network under most water courses, and whilst we will need to liaise, agree our design and obtain a permit with the Environment Agency (our contractors are liaising with them), as has been the case for other watercourses, we don't expect this to be contentious where we go under the watercourse. We expect further discussion with them relating to the bridge over Salmons Brook next to the Plevna Road bridge, although we agreed with them via a permit to install a pipe bridge across Salmons Brook adjacent to the Advent Way road bridge, so we are aware of their expectations.*

*With respect to the Ordinary Watercourse Consent for GNER Ditch, we won't be altering any waterflows or creating any culverts, but we can submit our design via the consent form to show how we are going to tunnel under*

*the ditch as we go along the cycle path, although since LBE have already created a GRP pipe flow protection for this part of the ditch route, our pipe crossing design under this GRP pipe will have no impact.*

- 8.6.6 The Environment Agency was consulted both on the original application and the proposed re-routing. The Environment Agency requested a condition to require a report on the physical condition of existing culverts, and if improvements are required that the applicant carry out these works. If an Environment Agency permit is needed for any part of the development, this is covered by separate legislation and does not need to be controlled through a planning permission or condition, the applicant will be reminded of the need to liaise with the EA regarding permits by informative.
- 8.6.7 The EA noted that this information is usually required at the planning stage to demonstrate the feasibility of a scheme. However, it was acknowledged the support that the scheme has from the Local Authority and other partners. The EA also noted they have also worked with Energetik on other aspects of the heat network - including river crossings and are confident that they will be able provide the information to satisfy the EA's concerns.

#### 8.7. Design, Heritage, and Archaeology

- 8.7.1. As the development consists of underground utilities that will not be visible once the roads and other surfaces are reinstated, and the only visible components will be maintenance access points at some junctions (similar to other in-road utilities such as water, electricity, gas, etc.), it is considered there would be no adverse visual impacts.
- 8.7.2. The proposed development passes by or through four conservation areas. Again, as it is an underground development and no heritage assets would be impacted, there is no objection raised in terms of heritage and conservation.
- 8.7.3. The applicant submitted a desk-based archaeology report, which found no probable archaeological site within the proposed route. The Greater London Archaeological Advisory Service at Historic England was consulted and noted the route was not in a site of archaeological interest. The GLAAS agree with the findings of the report and its proposed measures. Therefore, a condition has been included to require a Written Scheme of Investigation.

### 9. **Community Infrastructure Levy**

- 9.1. In this case, due to the nature of the development, the proposal would not be liable to pay the Council's CIL or the Mayoral CIL.

### 10. **Public Sector Equality 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**

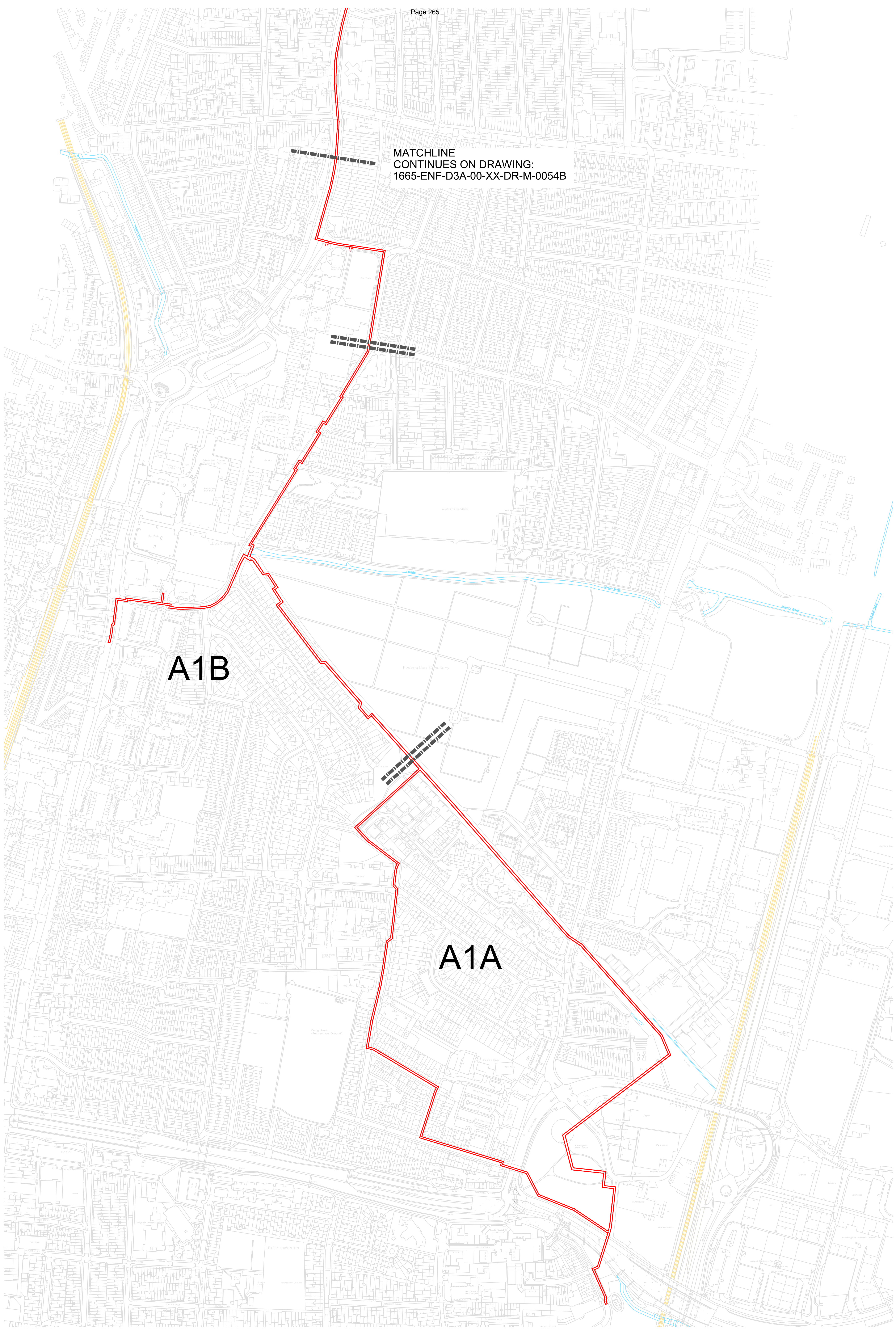
- 11.1. Strategic national, regional, and local policy is supportive of the delivery of decentralised energy networks. This application is for the first major phase of underground infrastructure to enable provision of reliable and sustainable energy and allow for future extension of the network. It is considered that the proposed route is in appropriate locations, there would be no visual impact, would be a significant investment in and a step towards a sustainable future for the Borough, and will mitigate any transportation, tree, archaeology, or contamination issues that may rise through the requirements of the suggested conditions or by following the plans put forth by the applicant.
- 11.2. The proposal is therefore recommended for approval subject to the recommended conditions.



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A1B

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**LEGEND**

Red Line Boundary

Zone demarcation



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Rev	Description	Issued	Checked	Date
005	RED LINE BOUNDARY UPDATED THROUGHOUT	26.02.22	PH	26.02.22
004	UNDATED TENDER ISSUE	10.05.22	PH	10.05.22
003	REVISIONS FROM TENDER OPEN	11.05.22	PH	11.05.22
002	UNDATED TENDER ISSUE	11.05.22	PH	11.05.22
001	ISSUE FOR TENDER	10.02.21	PH	10.02.21

Purpose of issue  
**TENDER**

Project Information  
 Client:  
**energetik**

Title: **Enfield District Heating Network**

Phase 1 Red Line Boundary

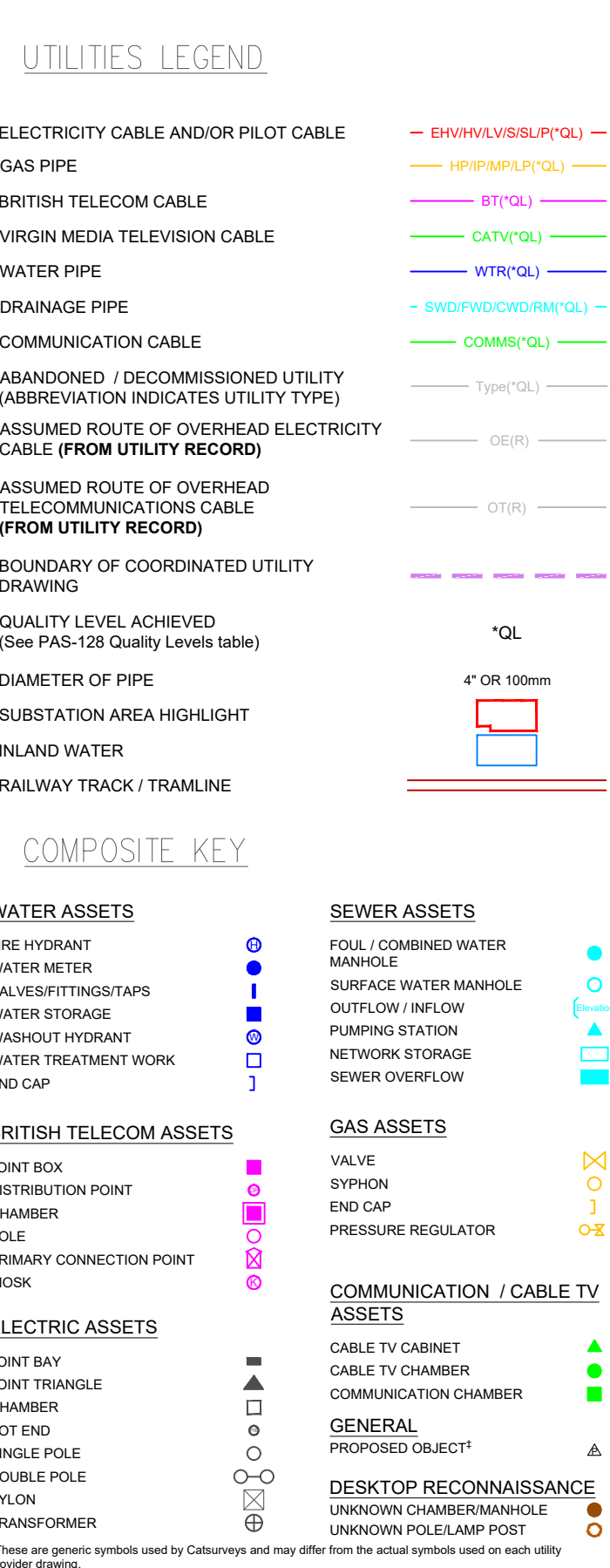
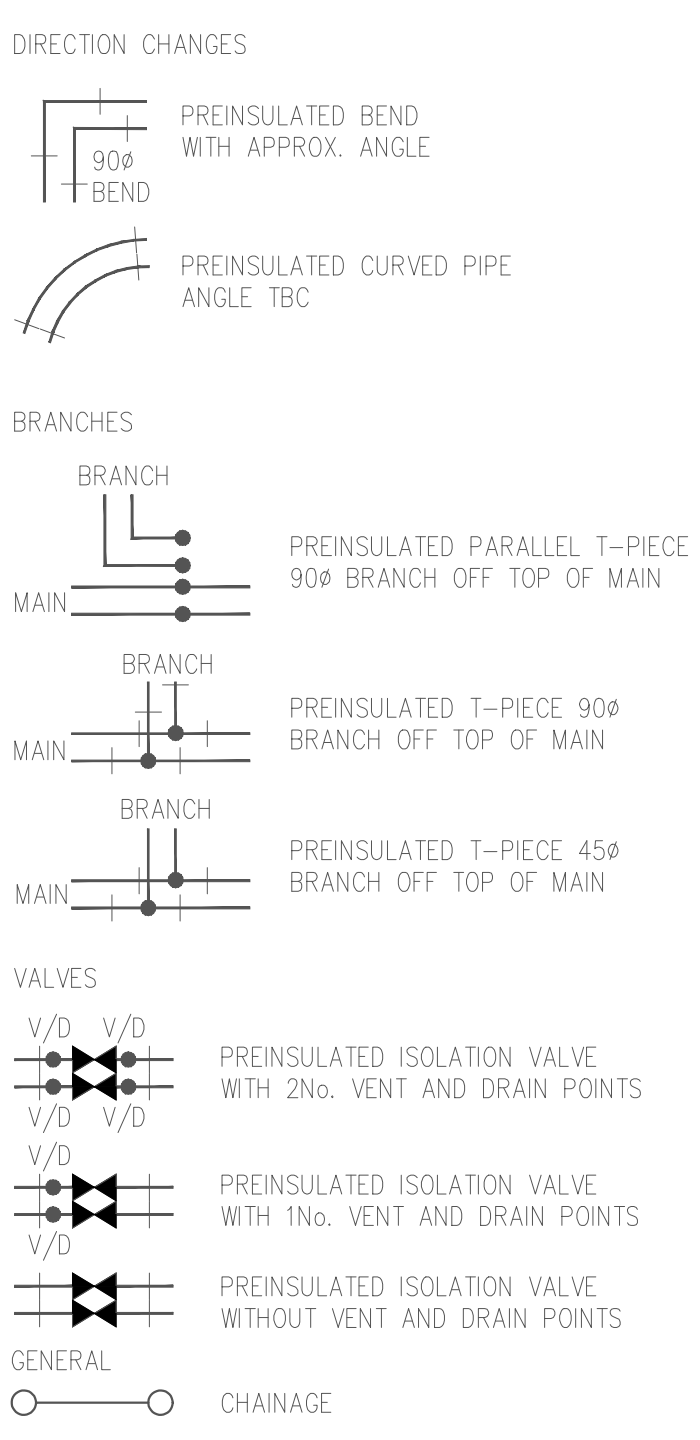
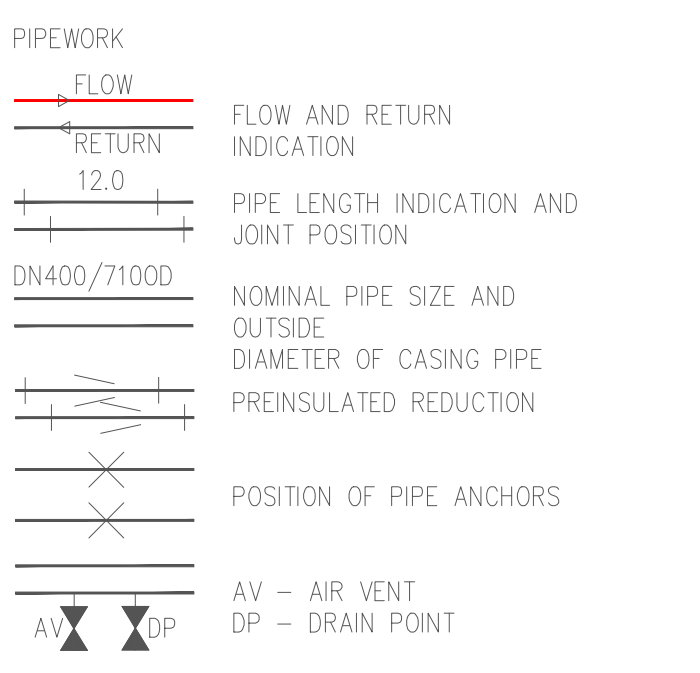
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**QUALITY LEVELS (BSI PAS-128)**

Quality Level	Method of Detection	Confidence Level
(A)	Verification by Excavation, Manhole / Inspection Chamber entry	Horizontal ±50mm Vertical ±25mm
(B1)	Detected by Multiple Geophysical Techniques (EM & GPR)	±150mm or ±15% of depth
(B2)	Detected by One Geophysical Technique (EM or GPR)	±250mm or ±40% of depth
(B3)	Geophysical Techniques Produced Weak Signal No Reliable Depth	±500mm Undefined
(C)	Geophysical Techniques Unsuccessful, Not Detected (Assumed Route)	Undefined Undefined
(B4)	Site Reconnaissance of Street Furniture / Signs / Topographical Features, Not Detected	Undefined Undefined
(D)	Desktop Utility Record Search Data Not Detected	Undefined Undefined

The letter 'D' can follow level B1, B2 & B3 to indicate that off-site post processing of GPR has been included.

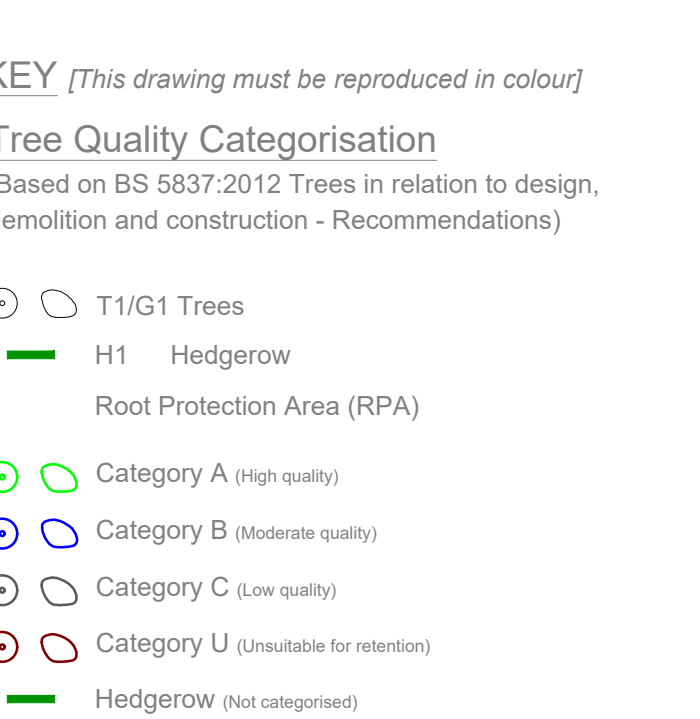
The information provided on this drawing about the existing utility infrastructure is based on historic records provided to the statutory undertakers and therefore should be used for guidance only.

OSRS was provided by the Client on 10.02.2021.

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**NOTES:**

This drawing should be read in conjunction with the respective Arboricultural Survey Data

The majority of trees were not recorded on the topographical survey provided. Where this was the case, tree locations have been approximated using a combination of aerial imagery and on-site observations

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Rev Description Issued Checked Date

**Purpose of Issue**

**TENDER**

Project Information

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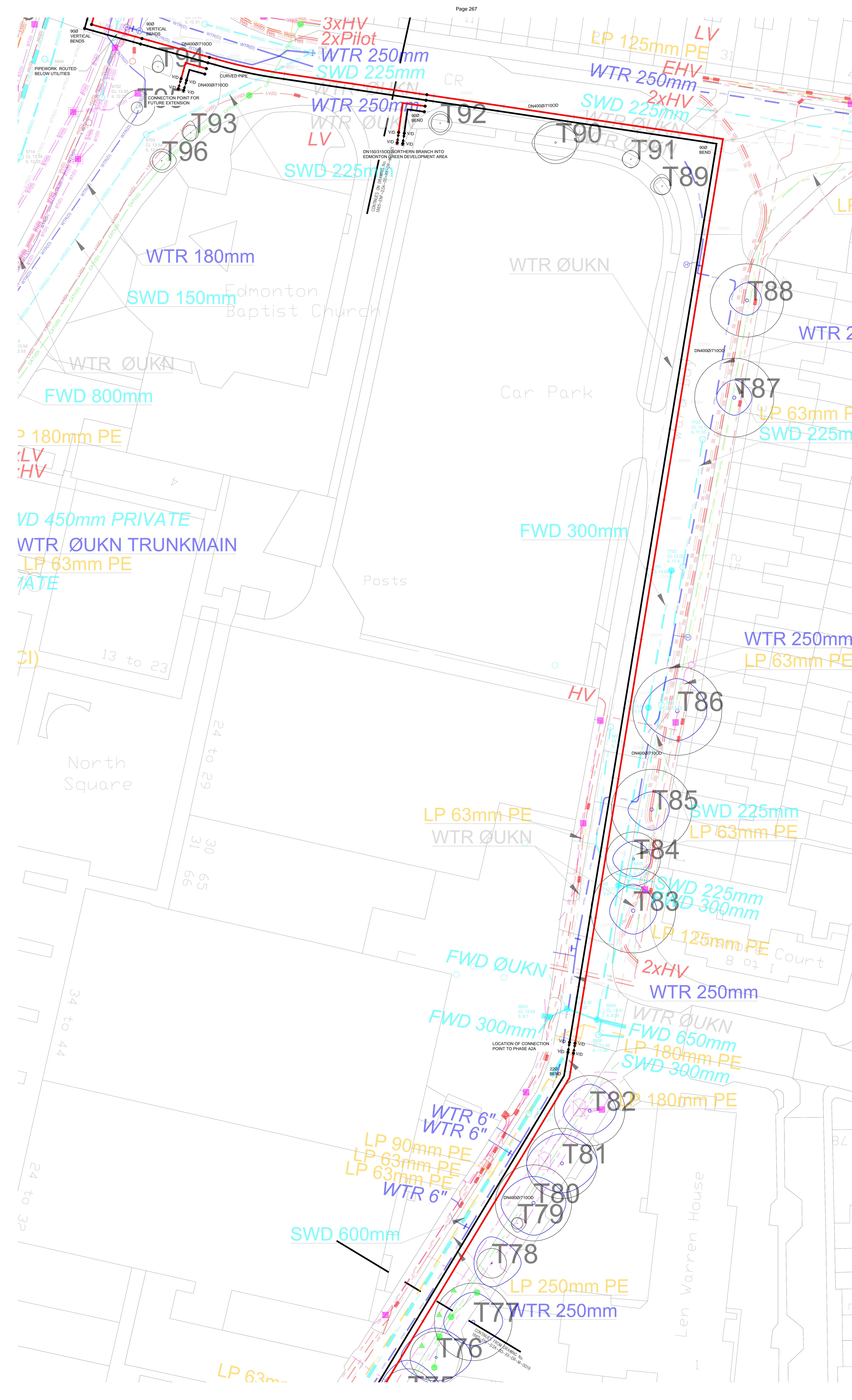
**emergetik**

Title: Enfield District Heating Network

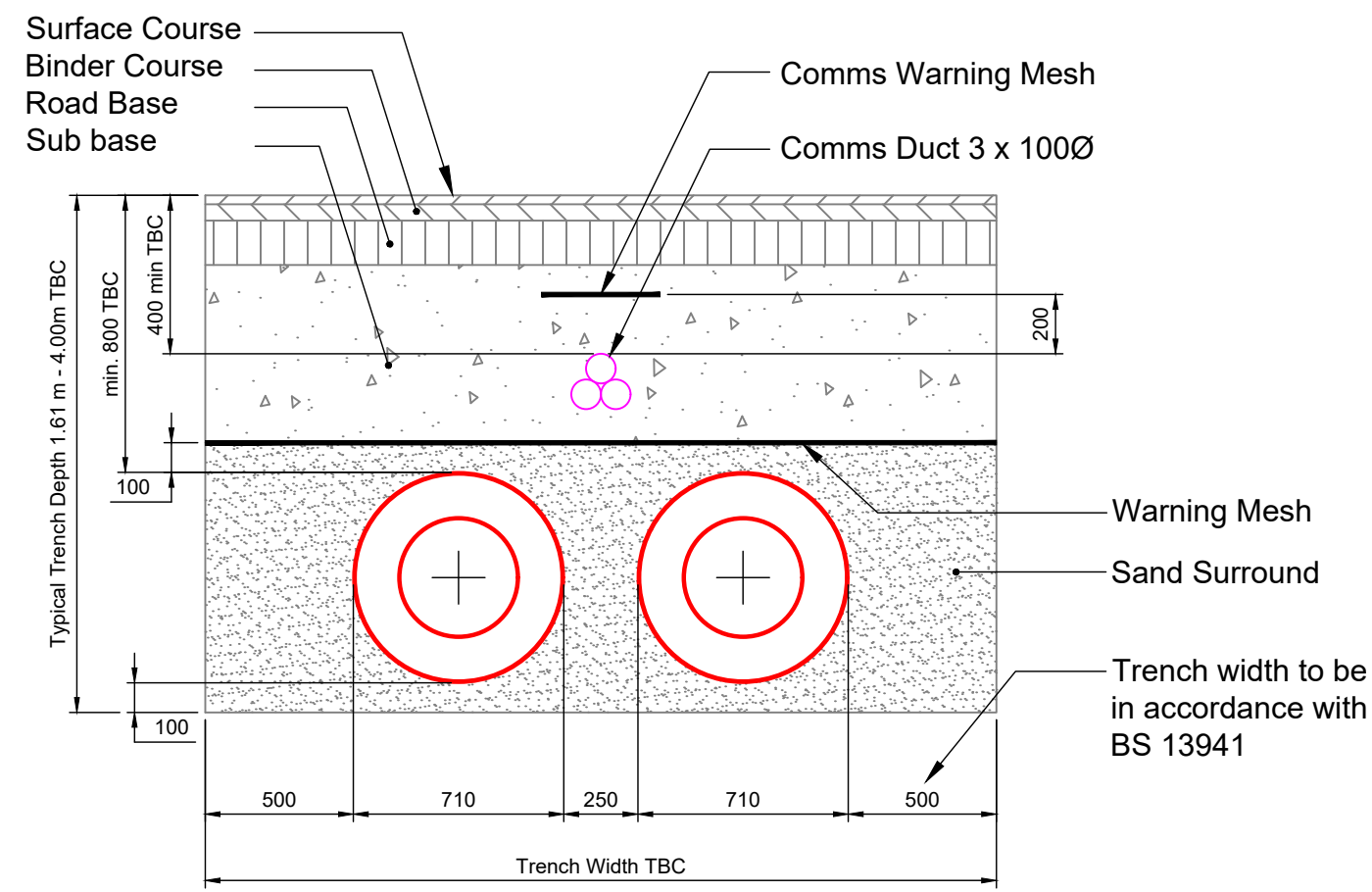
Drawing Information

**District Heating Network Phase 1 Layout 10 of 38**

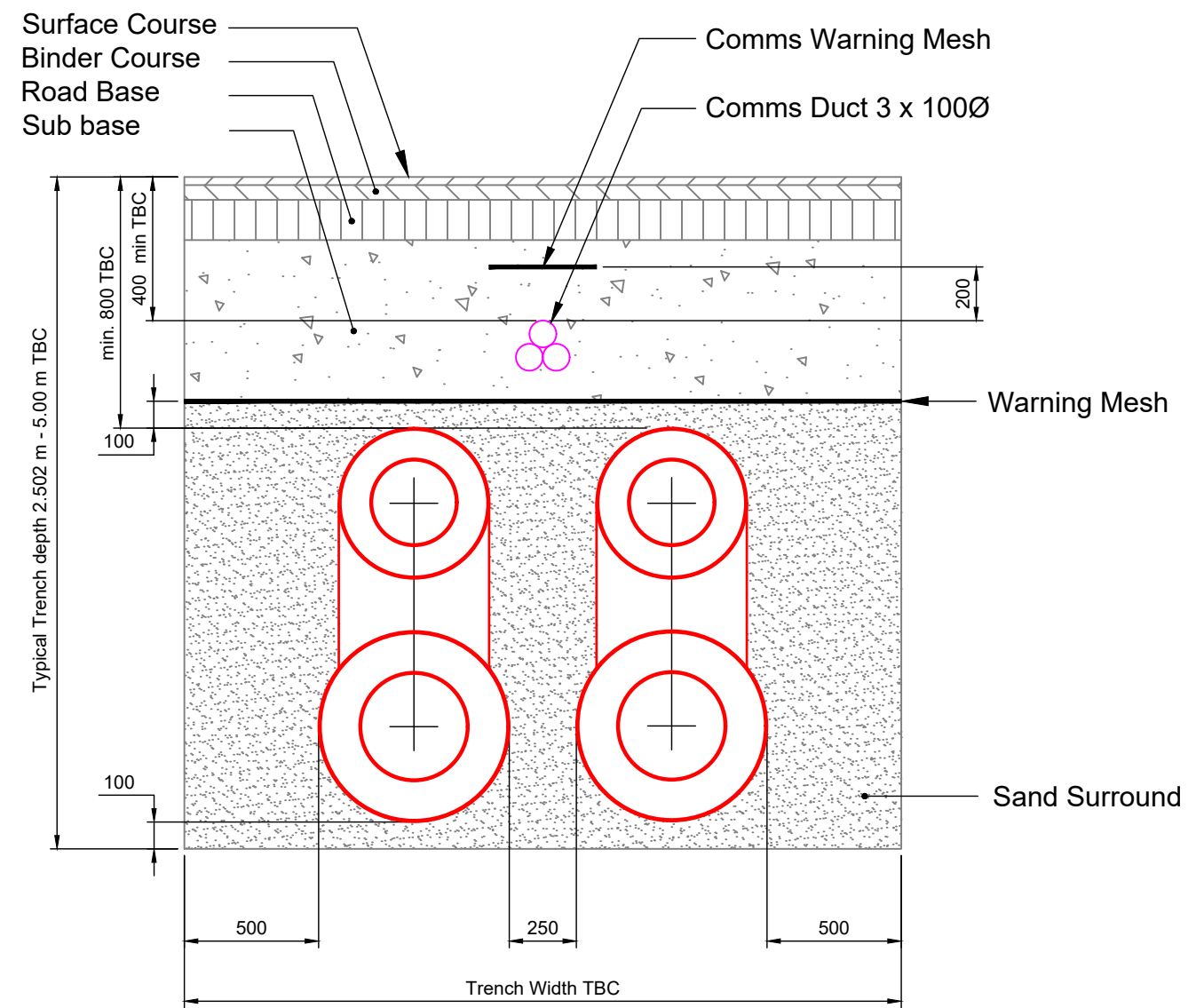
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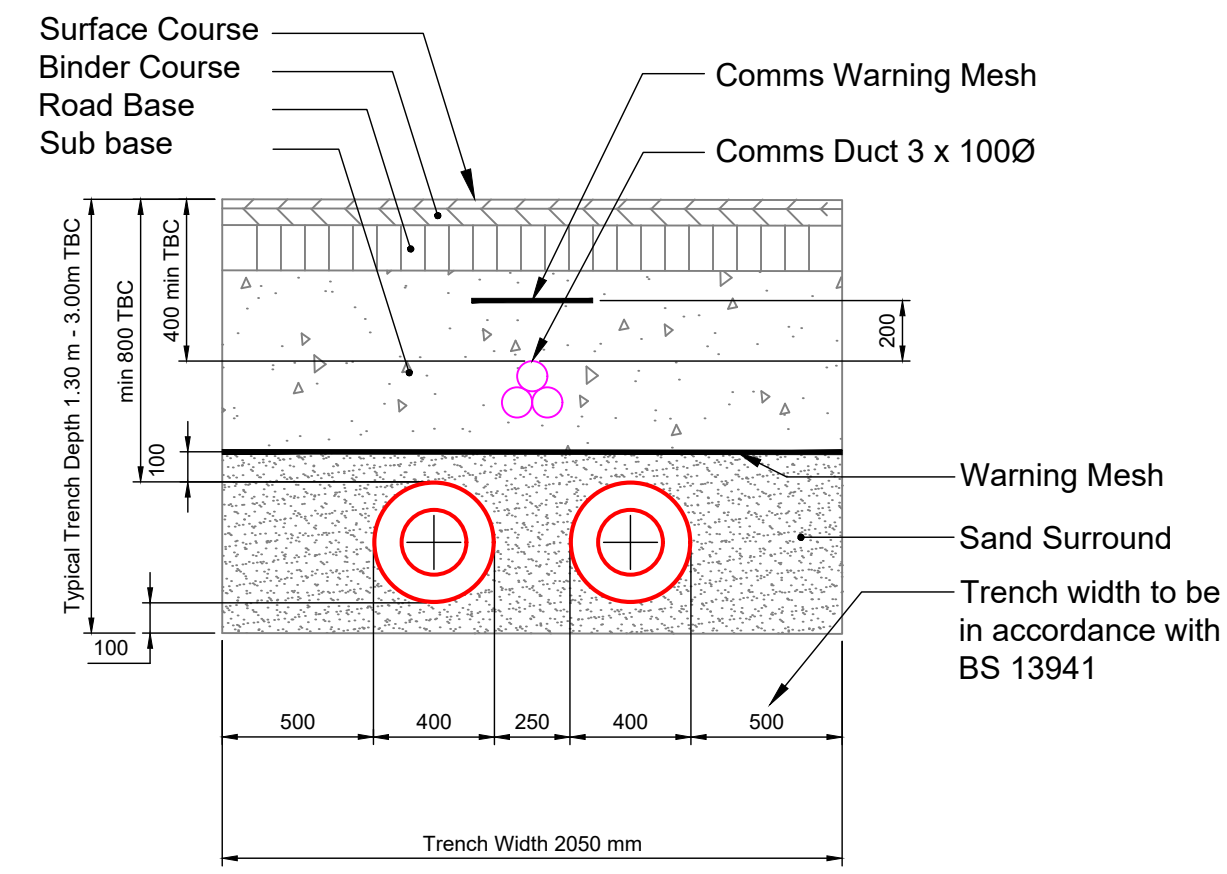




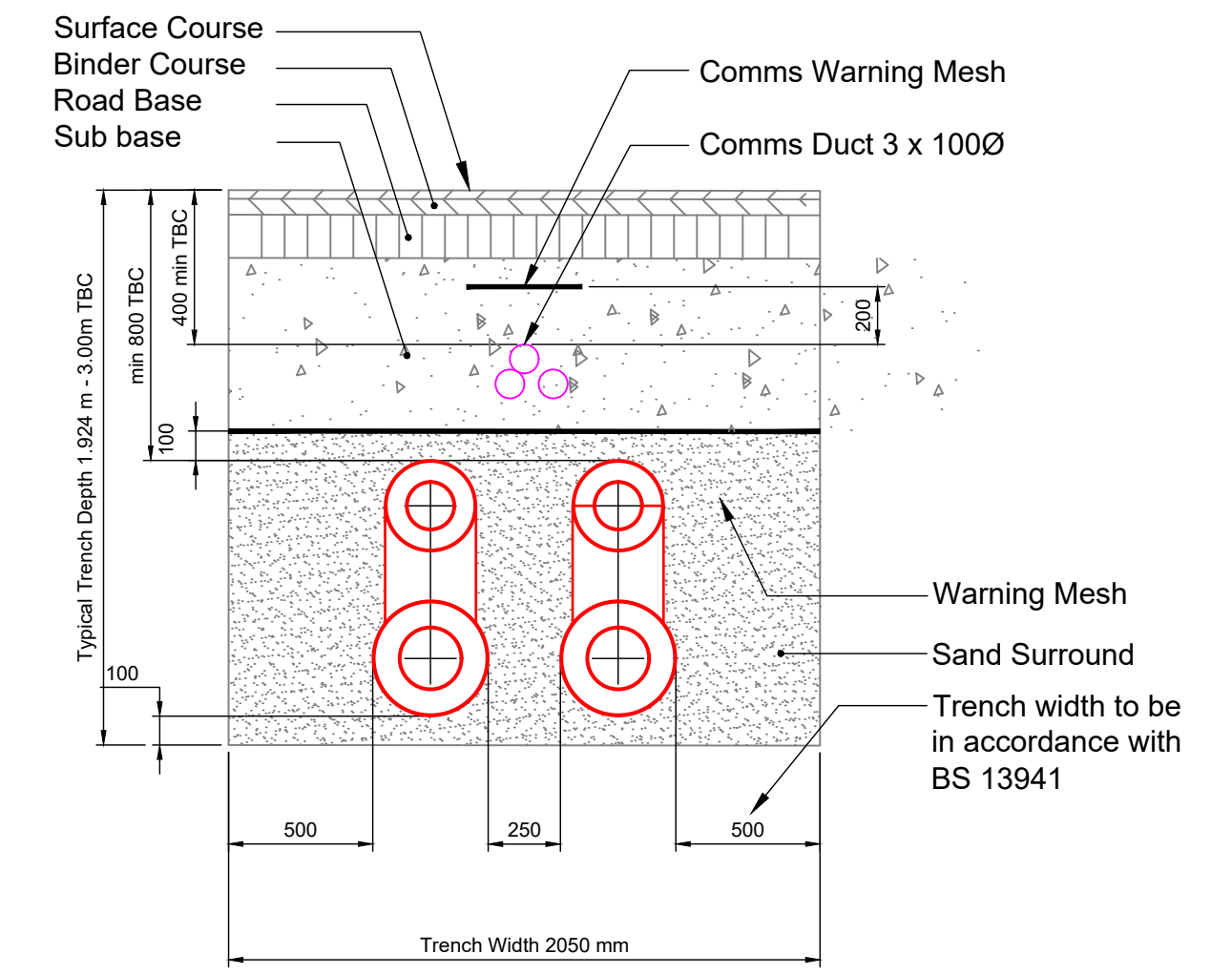
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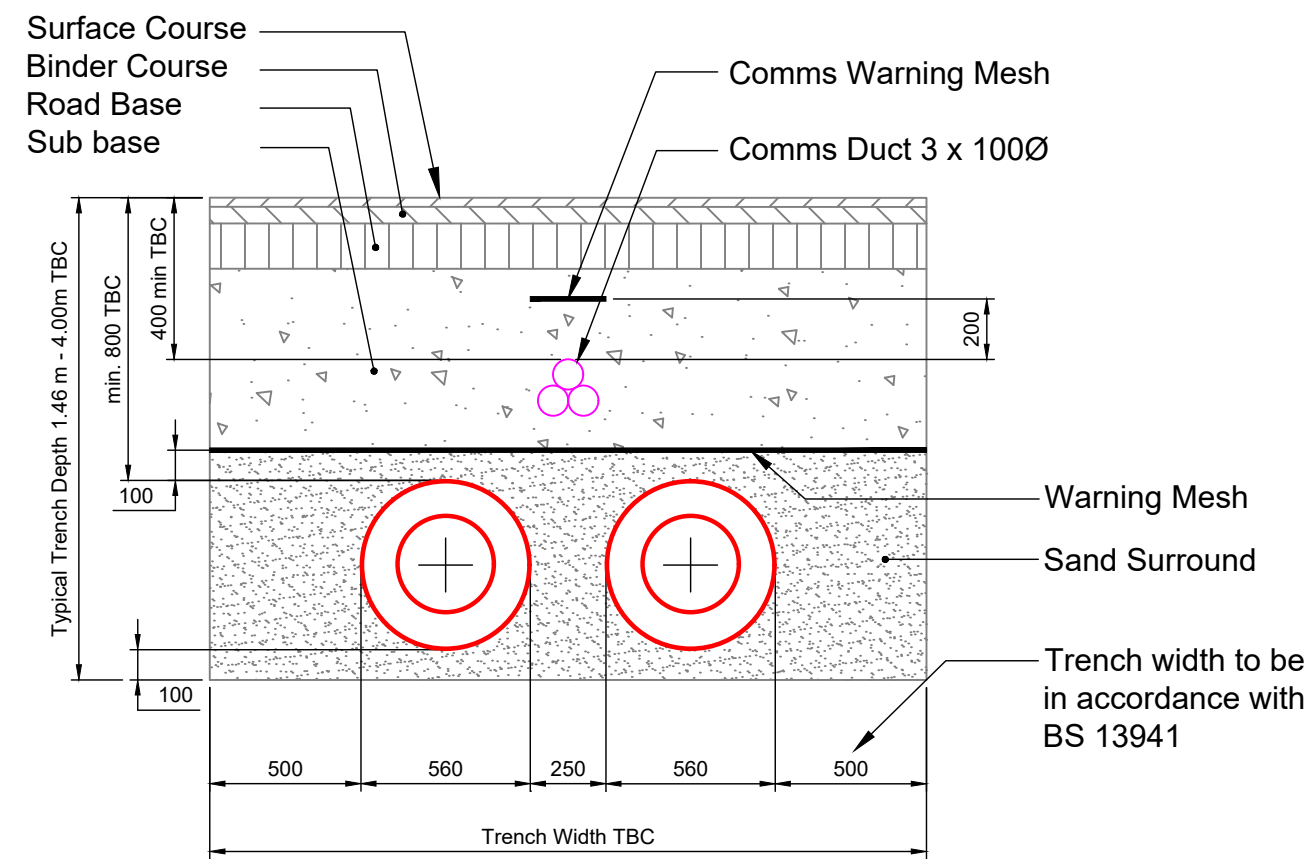
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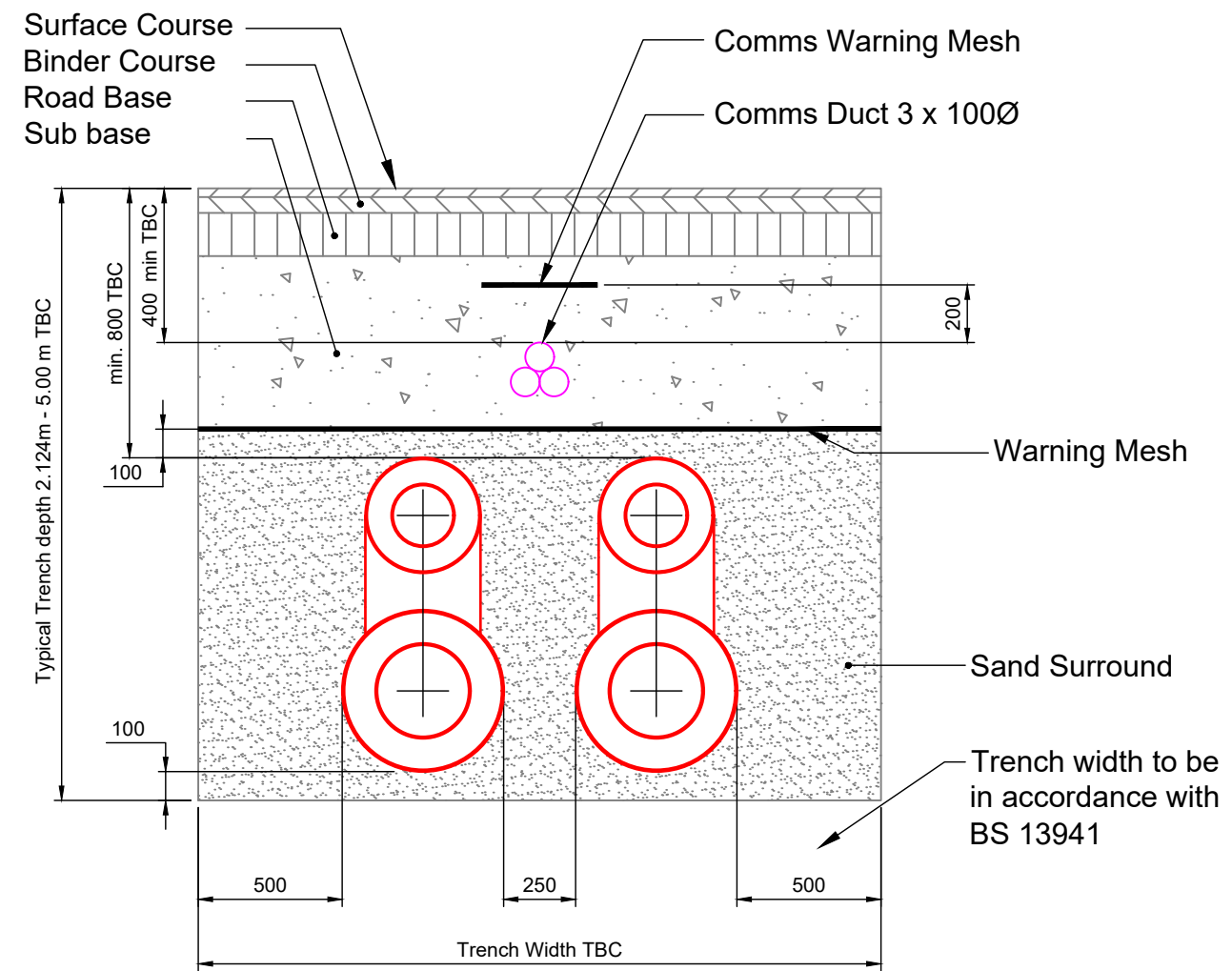
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TYPICAL TRENCH DETAIL**



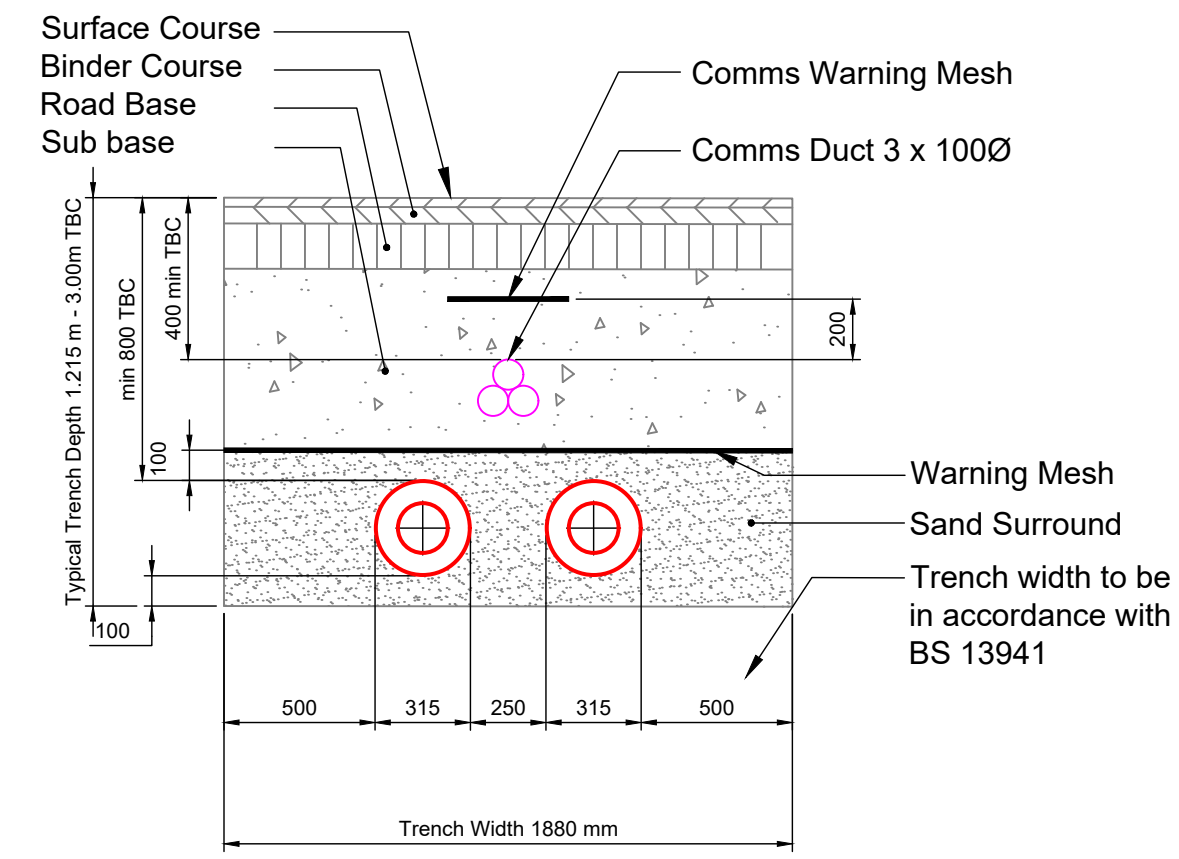
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C/W DN150/360 PARALLEL TEE**



**DN300/560OD SERIES 3**



**DN300/560OD SERIES 3  
C/W DN200/400OD PARALLEL TEE**



**DN150/315OD SERIES 3**

**NOTES:**

For additional technical information please refer to the Logstor manuals

- 1, Design
- 2, Design with Twin Pipes
- 3, Product Catalogue
- 4, Surveillance
- 5, Handling & Installation

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Rev	Description	Issued	Checked	Date
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Rev	Description	Issued	Checked	Date
001	TENDER ISSUE	10.12.21	PH	10.12.21
002	DETAILS UPDATED	14.12.21	PH	14.12.21

**Purpose of Issue**

TENDER

**Project Information**

Project: Enfield District Heating Network

**Phase 1:**

**Drawing Information**

Typical Trench Cross Sections

Client:



Project ID	Originator	Zone	Level	Type	Role	Drawing No.
ENF	D3A	00	XX	DR	M	0052
Project No.	Drawn	Scale @ A1	Status	Revision		
1665	DW	1:20		<b>D2</b>	<b>002</b>	

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