

# Public Document Pack



## PLANNING COMMITTEE

Tuesday, 18th July, 2023 at 7.00 pm  
Conference Room, Civic Centre, Silver  
Street, Enfield, EN1 3XA

Contact: Harry Blake-Herbert  
Governance Officer  
Direct: 020-8132-0807  
Tel: 020-8379-1000  
Ext: 0807

E-mail: [Democracy@enfield.gov.uk](mailto:Democracy@enfield.gov.uk)

Council website: [www.enfield.gov.uk](http://www.enfield.gov.uk)

## MEMBERS

Councillors: Sinan Boztas (Chair), Mahym Bedekova (Vice-Chair), Josh Abey, Kate Anolue, Lee Chamberlain, Peter Fallart, Thomas Fawns, Ahmet Hasan, Bektas Ozer, Michael Rye OBE, Jim Steven, and Eylem Yuruk.

**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 - 6)

To approve the minutes of the meeting held on Tuesday 20 June 2023 as a true and correct record.

### 4. REPORT OF THE HEAD OF DEVELOPMENT MANAGEMENT (Pages 7 - 10)

To receive and note the covering report of the Head of Development Management.

**5. 22/03123/VAR - 241 GREEN ST, ENFIELD, EN3 7SJ (Pages 11 - 52)**

**RECOMMENDATIONS:**

1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to referral of the application to the Greater London Authority and the completion of a Deed of Variation to the original 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 That the Head of Development Management be granted delegated authority to finalise the wording of the Deed of Variation to the original s106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

WARD: Brimsdown

**6. 21/02546/FUL - 368 COCKFOSTERS ROAD, BARNET, EN4 0JT (Pages 53 - 98)**

**RECOMMENDATIONS:**

1. That subject to the completion of a S106 Agreement to secure the obligations set out in this report, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions.

2. That the Head of Development Management be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report and the final S106 Agreement to cover the matters identified in the S106 Contributions section of the report.

WARD: Cockfosters

**7. 20/01982/FUL - LAND REAR OF ELLINGTON COURT, SOUTHGATE N14 6LB (Pages 99 - 134)**

**RECOMMENDATIONS:**

1. That the Head of Development Management be authorised to GRANT planning permission subject to conditions.

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

WARD: Southgate

**8. 23/00824/FUL - HERITAGE HOUSE 345 SOUTHBURY ROAD ENFIELD EN1 1TW (Pages 135 - 208)**

**RECOMMENDATIONS:**

1) That subject to the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions.

2) That the Head of Development Management be granted delegated

authority to agree the final wording of the Section 106 Agreement and the conditions to cover the matters in the Recommendation section of this report.

WARD: Ponders End

## **9. DATES OF FUTURE MEETINGS**

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

Tuesday 1<sup>st</sup> August 2023 (provisional)  
Tuesday 29<sup>th</sup> August 2023 (provisional)  
Tuesday 5<sup>th</sup> September 2023 (provisional)  
Tuesday 19<sup>th</sup> September 2023  
Tuesday 17<sup>th</sup> October 2023  
Tuesday 7<sup>th</sup> November 2023 (provisional)  
Tuesday 21<sup>st</sup> November 2023  
Tuesday 19<sup>th</sup> December 2023  
Tuesday 9<sup>th</sup> January 2024 (provisional)  
Tuesday 23<sup>rd</sup> January 2024  
Tuesday 13<sup>th</sup> February 2024 (provisional)  
Tuesday 20<sup>th</sup> February 2024  
Tuesday 5<sup>th</sup> March 2024 (provisional)  
Tuesday 19<sup>th</sup> March 2024  
Tuesday 23<sup>rd</sup> April 2024

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

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## PLANNING COMMITTEE - 20.6.2023

**MINUTES OF THE MEETING OF THE PLANNING COMMITTEE  
HELD ON TUESDAY, 20 JUNE 2023****COUNCILLORS**

**PRESENT** Sinan Boztas (Chair), Josh Abey, Kate Anolue, Lee Chamberlain, Peter Fallart, Thomas Fawns, Ahmet Hasan, Michael Rye OBE, Jim Steven, and Eylem Yuruk.

**ABSENT** Bektas Ozer and Mahym Bedekova

**OFFICERS:** Andy Higham (Head of Development Management), Mike Hoyland (Senior Transport Planner), Michael Kennedy (Place Department), Kate Perry (Principal Planning Officer), Julie Thornton (Legal Services), Claire Williams (Planning Decisions Manager), and Metin Halil (Secretary).

**Also Attending:** Applicant and agent representatives, and officers observing.

**1 WELCOME AND APOLOGIES**

The Chair welcomed everyone to the meeting.

Apologies for absence were received from the following:

- Councillor Mahym Bedekova
- Councillor Bektas Ozer

**2 DECLARATIONS OF INTEREST**

NOTED

The following declarations of Interest were received:

1. Councillor Josh Abey declared a Non-Pecuniary interest that he was contacted as a ward councillor by the applicant for item 8, application reference: 22/02680/FUL.

**3 MINUTES OF PREVIOUS MEETING**

The minutes of the Planning Committee meeting held on Tuesday 23 May 2023 were agreed.

**4 REPORT OF THE HEAD OF DEVELOPMENT MANAGEMENT**

The report of the Head of Development Management was **NOTED**.

**PLANNING COMMITTEE - 20.6.2023**

**5 23/00294/FUL - 1-44 AVALON CLOSE, ENFIELD, EN2 8LR**

NOTED

1. Planning Officers have agreed to a request from the Agent for the application at 1-44 Avalon Close to be **withdrawn** from the Agenda so that further studies can be commissioned by the Applicant into the potential impact of the development and will Not be heard at Tuesdays (20 June 2023) Planning Committee.

**6 22/01969/HOU - 11 PARK NOOK GARDENS ENFIELD EN2 0HT**

NOTED

1. The introduction by Kate Perry, Principal Planning Officer, clarifying the proposal and the scheme.
2. The deputation of Councillor Hannah Dyson, Whitewebbs Ward Councillor on behalf of residents in objection to the application with the following concerns:
  - the bungalow (13 Park Nook Gardens) was just 90 cm from the boundary with the property at No.11. The proposed boundary would be 4m high and run within 90cm of the bungalow wall from front to back and directly in front of their kitchen window which is the main source of light into the kitchen.
  - The development would impact the physical and mental well being of the owners at No.13.
  - Owners at No.13 would have difficulty in accessing their property during the works.
  - Concerns about the foundations to No.13 as the bungalow was built in the 1930's on shallow foundations and cracks could occur due to the proximity of the proposed works.
3. The response of James Harries (Applicant).
4. Members' debate and questions responded to by officers.
5. During discussion, the following concerns were raised:
  - The distance between both properties at No.11 & No.13, which was 2m.
  - The height of the development which had been reduced to 2.8m from 3.2m.
  - Sunlight/daylight issues, which officers clarified that within the parameters of accessibility, this was acceptable for side facing windows and where there are other windows, daylight/sunlight assessment figures wasn't necessary for this scale of development.
  - Access during building works – this has to be maintained between neighbours with building control picking up any significant issues.
  - Comparison between the permitted development plan and the actual planning application plan.
6. The unanimous support of the Committee for the officers' recommendation.

**PLANNING COMMITTEE - 20.6.2023**

**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 the report.

**7 22/02248/FUL - 24-26 CHURCHBURY LANE, ENFIELD, EN1 3TY**

**NOTED**

1. The introduction by Andy Higham, Head of Development Management, clarifying the proposal and the scheme.
2. The deputation of Kieran McCarthy (on behalf of the Churchbury Lane, Fyfield Road & Fir Tree Walk community) against the officers' recommendation.
3. The response of Savvas Michael (Applicant).
4. Members debate and questions responded to by officers.
5. During discussion, the following concerns were raised:
  - Clarity was sought regarding the traffic impact on the area, relating to the 19 rooms of the development and 20 staff. Accident records showed no accidents had occurred in this area in the last 23 years. Traffic calming improvements had been made in the area.
  - The need for this type of accommodation in the borough. Social Services team confirmed that there was no overwhelming demand in this borough which there may be elsewhere in London.
  - Compliance with the internal layout, planning was happy to accept a condition that details of compliance with the internal layout was provided and confirmed.
  - 20 staff at the development, these would be split on a shift basis with 10 working during the day and 10 at night. Since the appeal decision by the inspector, there has been the implementation of Churchbury Lane being closed at its junction with Parsonage Lane which has affected and changed the nature of traffic movements along that road.
  - Fire safety – a condition could be put in place to cover this and obtain a fire statement, but the main reliance would be under the building regulations.
  - Tree survey – officers had re-inspected the site and are satisfied that there had been no change in circumstances that would require another survey to be done and are therefore comfortable with the conclusions in the tree survey.
  - Loss of privacy/overlooking – this was for Members to make a judgement on. The flank elevation showed that there are windows that have been obscure glazed so members would

**PLANNING COMMITTEE - 20.6.2023**

- have to judge what the loss of privacy is, as a result of those obscure glazed windows, to the neighbouring properties.
- Roof lights on the 2<sup>nd</sup> floor and obscure glazing in certain areas – Members were reminded of the requirements for a tilted balance. The nature of the accommodation meant that there are communal spaces that the residents could come out into and would benefit from other uses. These were not traditional flats. In planning terms there were no such regulations regarding roof lights, obscure glazing and whether rooms should also be doubles.
  - Supported living standards and challenging behaviour of residents – Residents could be stuck in rooms with only roof lights for ventilation if unable to be taken outside. A condition could be imposed detailing how rooflights could be controlled as regards opening them.
  - Communal areas/Amenity space.
6. The proposal by Councillor Rye to defer the application, seconded by Councillor Steven, for the following reasons:
- To provide certainty as to how the internal layout will work.
  - Regarding Trees – what is being retained, provided and any re-planting.
  - What amenity space is being offered for 1<sup>st</sup> and 2<sup>nd</sup> floor occupants, and if adequate.
  - Fire safety – to see if standards are being met.
  - To investigate if there are any access to daylight/sunlight issues.
7. The unanimous support for the motion to defer for the above reasons.

**Officers Recommendation NOT Agreed.**

**Application DEFERRED for further consideration.**

**8 22/02680/FUL - UNITS 1A TO 1B ALEXANDER PLACE, NEW SOUTHGATE INDUSTRIAL ESTATE, LOWER PARK ROAD, LONDON, N11 1QD**

NOTED

1. The introduction by Claire Williams, Planning Decisions Manager, clarifying the proposals and the scheme.
2. Members debate and questions responded to by Officers including clarification of any daylight/sunlight issues, the height of the development, fire safety issues, the job generation of the scheme and clarification of the Section 106 process by the legal representative.
3. Additional conditions added as follows:
  - Details of Pedestrian & Cycle access
  - Refuse facilities
  - BREEAM (Building Research Establishment Environmental Assessment Method) will change from Outstanding to Excellent.
4. The unanimous support of the Committee for the officers' recommendation.



**PLANNING COMMITTEE - 20.6.2023**

**AGREED**

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

**9**

**DATE OF FUTURE MEETINGS**

Tuesday 4<sup>th</sup> July 2023 (provisional)  
Tuesday 18<sup>th</sup> July 2023  
Tuesday 1<sup>st</sup> August 2023 (provisional)  
Tuesday 29<sup>th</sup> August 2023 (provisional)  
Tuesday 5<sup>th</sup> September 2023 (provisional)  
Tuesday 19<sup>th</sup> September 2023  
Tuesday 17<sup>th</sup> October 2023  
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Tuesday 20<sup>th</sup> February 2024  
Tuesday 5<sup>th</sup> March 2024 (provisional)  
Tuesday 19<sup>th</sup> March 2024  
Tuesday 23<sup>rd</sup> April 2024

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

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## London Borough of Enfield

<b>Report Title</b>	Report of Head of Development Management
<b>Report to</b>	Planning Committee
<b>Date of Meeting</b>	18 <sup>th</sup> July 2023
<b>Cabinet Member</b>	Councillor Susan Erbil
<b>Executive Director / Director</b>	Brett Leahy – Director of Planning & Growth Sarah Cary – Executive Director Housing, Regeneration & Development
<b>Report Author</b>	Andy Higham <a href="mailto:andy.higham@enfield.gov.uk">andy.higham@enfield.gov.uk</a>
<b>Ward(s) affected</b>	All
<b>Key Decision Number</b>	Non Key
<b>Classification</b>	Part 1 Public

### 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.

### Recommendations

I. To Note

## **Background**

2. 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.
3. 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 the London Plan 2021. Other supplementary documents material to the assessment are identified in the individual reports.
4. Other background papers are those contained within the file, the reference number of which is given in the heading to each application and which can be viewed via the online planning register on the Council's website.

## **Main Consideration**

5. On the Schedules attached to this agenda, recommendations in respect of planning applications and applications to display advertisements are set out.
6. Also set out in respect of each application a summary of any representations received. Any later observations will be reported verbally at your meeting.
7. In accordance with delegated powers, 437 applications were determined between 07/06/2023 and 04/7/2023, of which 279 were granted and 82 refused.
8. A Schedule of Decisions is available in the Members' Library.

## **Relevance to Council Plans and Strategies**

9. 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

## **Financial Implications**

10. None

## **Legal Implications**

11. None

**Equalities Implications**

12 None

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

**Date of report: 07.07.2023**

**Appendices**

None.

Background Papers

To be found on files indicated in Schedule.

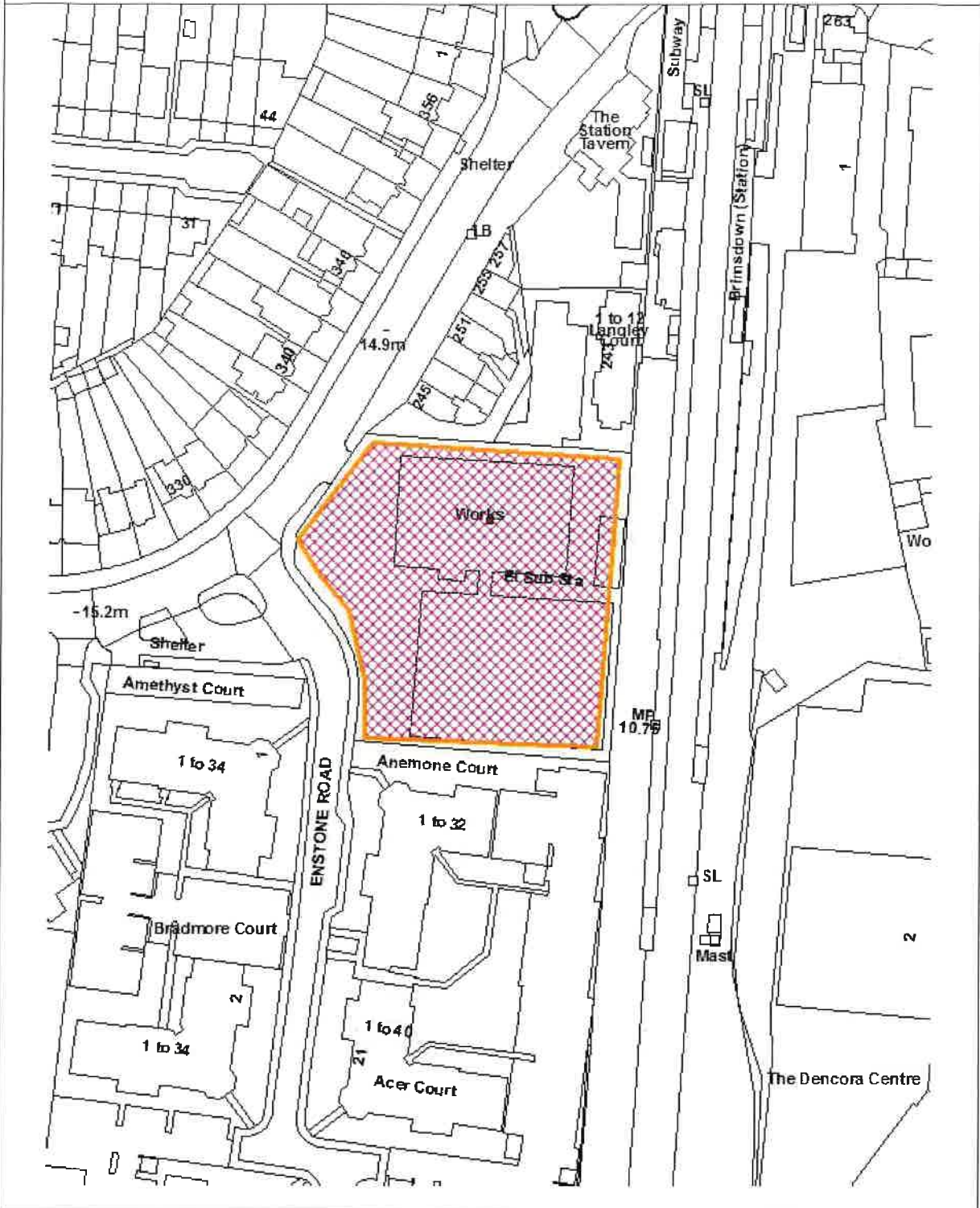
**Background Papers**

None

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<b>LONDON BOROUGH OF ENFIELD</b>		
<b>PLANNING COMMITTEE</b>		<b>Date:</b> 18 July 2023
<b>Report of</b> Director of Planning and Growth – Brett Leahy	<b>Contact Officer:</b> Karolina Grebowiec-Hall	<b>Ward:</b> Brimsdown
<b>Application Number:</b> 22/03123/VAR		<b>Category:</b> Major
<b>LOCATION:</b> 241 Green St, Enfield, EN3 7SJ		
<b>PROPOSAL:</b> Variation of condition 02 granted under planning application 20/01526/FUL to introduce second stairs, internal layout changes, amendments to car and bicycle parking, and to amend the type of residential accommodation and quantum of affordable housing.		
<b>Applicant Name &amp; Address:</b> Stonegate Homes (Enfield) Limited		<b>Agent Name &amp; Address:</b> Montagu Evans 70 St Mary Axe, London, EC3A 8BE
<b>RECOMMENDATION:</b>		
<p>1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to referral of the application to the Greater London Authority and the completion of a Deed of Variation to the original 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 That the Head of Development Management be granted delegated authority to finalise the wording of the Deed of Variation to the original s106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.</p>		

Ref: 22/03123/VAR LOCATION: 241 Green Street, Enfield, EN3 7SJ,



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**1. Note for Members**

- 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 referral of the application to the Greater London Authority and the completion of a Deed of Variation to the original 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 That the Head of Development Management be granted delegated authority to finalise the wording of the Deed of Variation to the original s106 Agreement and agree the final wording of the conditions to cover the following matters:

1. Time limit
2. Approved drawings compliance
3. Commercial space restriction
4. External finishing materials
5. Opening hours
6. Surfacing materials-
7. Landscaping details
8. Biodiversity enhancement measures
9. Operational/Service Management Plan
10. BREEAM New Construction Rating
11. Car Parking Management Plan
12. Cycle parking details
13. Electrical vehicle charging points
14. Waste details
15. Green/brown roofs
16. Water management
17. Contamination
18. Piling
19. Construction Management Plan
20. Water conservation
21. Acoustic Report
22. External lighting details
23. Secured by Design
24. Dwelling mix and floor areas
25. Drainage
26. Sound insulation
27. Carbon emissions
28. Energy certificates
29. Green Procurement and Construction Plan
30. Surface water culvert distance
31. Flood Management Report
32. SuDS Strategy
33. SuDS verification report
34. Finished floor levels in plans
35. Lifts

36. Air Quality Positive Statement
37. Whole Life-Cycle Carbon Assessment
38. Whole Life-Cycle Carbon Assessment post-construction assessment
39. Connectivity infrastructure
40. Circular Economy Statement and Operational Waste Management Strategy
41. Circular Economy Statement Post Completion Report
42. Details of zero / low carbon technologies
43. Accessible housing
44. Baseline biodiversity levels
45. Revised energy report
46. Confirmation of Biodiversity Net Gain (new)
47. Tenure blind affordable units (new)
48. Confirmation of Urban Greening Factor (new)
49. Compliance with Fire Strategy (new)

### **3. Executive Summary**

- 3.1. This application is for an amendment to planning application 20/01526/FUL to vary condition 02 for approved plans and documents.
- 3.2. Planning Committee voted to approve application 20/01526/FUL on 15 December 2020. The decision notice was issued on 28 March 2022.
- 3.3. The proposal remains unchanged but for the amendments set out in paragraphs 3.5 and Section 5 (in greater detail) of this report.
- 3.4. Planning application 20/01526/FUL was for redevelopment of the site involving demolition of the existing buildings and erection of a mixed-use development ranging from 2 to 16 storeys comprising 148 residential units in three blocks, together with commercial floorspace (A1, A2, A3, B1, B2, B8, D1 and D2) at part ground / first floor levels together with substation, car parking, cycle parking, amenity areas, landscaping and associated works.
- 3.5. In amending the extant approval, the applicant seeks to make the following changes to the permitted scheme:
  - Second stairs are introduced in Blocks B and C to allow a second means of fire escape in line with new fire safety requirements introduced by the Mayor of London in February 2023.
  - Resulting from the addition of second stair cores:
    - The unit mix is altered to provide 63 x 1 bed homes (54 approved), 72 x 2 bed homes (71 approved) and 13 x 3 bed homes (23 approved).
    - The total number of units of 148 homes remains unchanged.
    - The number of car parking spaces is reduced from 46 to 43 spaces, resulting in a parking ratio change from 0.31 spaces to 0.29 spaces
    - The number of cycle parking space is increased from 286 to 290.
  - Housing tenures are amended from approved split of 35% London Affordable Rent, 15% Intermediate Market Rent and 50% market sale to 100% Build-to-Rent.
  - The affordable housing component is amended from 50% of habitable rooms/49% of units to 23% of habitable rooms/25% of units. Of the affordable housing provision, affordable tenures are changed as follows:

- From approved 49% of total units: comprising 70% London Affordable Rent and 30% Intermediate Market Rent
  - To proposed 25% of total units: comprising 100% Discounted Market Rent. The rent levels would be set at 30% below full market local rents for the ward.
- 3.6. The introduction of second stairs in Blocks B and C of the consented project brings incalculable benefit to the safety of the buildings and its occupants. This is an essential amendment, although it has consequential impacts. The stair cores have cut into floor plates, resulting in a reduction and reconfiguration of floorspace with an amended unit mix. The applicant has sought to make the changes within the approved massing so as not to affect the exterior design of the buildings. The application also seeks to modify the housing product and affordable housing component to bring it in line with a viability-tested level.
- 3.7. The reduction in affordable housing provision from 50% of habitable rooms (49% of units) as approved to 23% of habitable rooms (25% of units) is notable. The application demonstrates, through a viability assessment, that the present permission is not practicable and the amendments to housing type and affordable component will enable the project to move forward. The revised affordable housing provision is the maximum affordable housing that can viably be delivered on the site. Having failed the statutory Housing Delivery Test, Enfield is in a position of "presumption in favour of sustainable development category", which means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Under the present application, the provision of Build to Rent housing brings planning benefit as a beneficial housing type, which is an improvement from unregulated rental housing. The proposed breadth (25% of units) and depth (30% below local market rents) of affordable housing provides an intermediate-level affordable housing in a size mix that meets Enfield's evidenced needs.
- 3.8. The residential provision remains of a high quality, there are no changes to the number of residential units to be provided and the contributions secured through the original permission remain.
- 3.9. The primary public benefits of the proposed amendments to the approved scheme can be summarised as follows:
- Second stairs are incorporated in the 12- and 16-storey building segments to ensure the highest standards of fire safety are met
  - All homes are Build to Rent, which secures transparent tenancy terms, longer tenancy periods and well-managed housing which is of a higher quality than conventional private rented housing
  - 25% of homes will be affordable as Discounted Market Rent Build to Rent units
  - Affordable housing has been viability tested to maximise the development's potential to provide affordable housing and to improve its deliverability, which are both key to meeting Enfield's acute housing need
  - Car parking is slightly decreased and provision of cycle parking slightly increased, which supports more sustainable transportation choices
- 4. Site and surroundings**

- 4.1 The subject site is located within the Brimsdown Ward located approximately 2 miles east of Enfield Town Centre. It is an irregularly shaped site that measures approximately 4600 square metres, located on the eastern side of the junction of Green Street and Enstone Road, just south of Brimsdown Railway Station. Brimsdown Station offers access to rail services on the West Anglia main line.
- 4.2 The site is bounded to the east by railway tracks, beyond which lies a large swathe of land designated as Strategic Industrial Land, containing the second largest industrial estate in London.
- 4.3 To the north east the site is bound by a 3 storey residential block (that also backs onto the railway) and to the immediate north a 2 storey block that fronts Green Street, comprising of commercial uses at ground floor with a mixture of other uses above.
- 4.4 To the immediate west of the site lies the Green Street bus stand which is the terminus for buses serving the 191 and 307 bus routes. Beyond Green Street bus stand, and across Green Street to the north west, lies a traditional pattern of 1930's, 2 storey predominately semi detached houses set behind reasonably generous front gardens.
- 4.5 To the south and south west of the site lies a series of homogenous 3 and 4 storey flatted blocks of late 20th Century construction with off street parking set to the sides and/or rear. These blocks are characterised by their generous setbacks from the back edge of pavement in a manner commensurate with the front garden depths of the 1930's houses nearby.
- 4.6 The railway acts as an significant dividing line between the residential developments on its western side and the industrial land to the east. Indeed the application site is the last site in the near vicinity on the western side of the railway in large scale employment use.
- 4.7 The southern part of the site is located in Flood Zone 1 (land assessed as having the least annual probability of flooding) whilst the northern part of the site is located within Flood Zone 2. Aside from this the site has no other specific designation within the Enfield Development Management Document 2014.
- 4.8 There are no statutorily or non-statutorily listed buildings on or near the site and the site does not lies within or in close proximity to a conservation area.
- 4.9 The site is accessed via metal gates onto Green Street and Enstone Road and presently contains two large warehouse-type buildings with 3,318 square metres of floor space with associated surface car parking. The site is vacant and is in a condition that makes it unsuitable for occupation or use. Building works have not commenced on site.

## **5. Proposal**

- 5.1 The present application is for an amendment to application 20/01526/FUL. Application 20/01526/FUL was granted subject to conditions for demolition of all buildings on the site to provide a mixed-use scheme with 148 flats, divided

into three blocks comprising principally commercial floorspace at ground and first floor levels (Blocks A, B and C), together with ground and first floor level car parking and publicly and privately accessible landscaped areas.

- 5.2 This report considers only the proposal brought by the present application for minor material amendments. This report does not re-consider the proposal for which permission was granted under application 20/01526/FUL.
- 5.3 The present application seeks to make the following changes to the permitted scheme:
- Second stairs are introduced in Blocks B and C to allow a second means of egress in line with new fire safety requirements introduced by the Mayor of London in February 2023 for buildings in excess of 30 metres in height.
  - Resulting from the addition of second stair cores:
    - unit mix is altered to provide 63 x 1 bed homes (54 approved), 72 x 2 bed homes (71 approved) and 13 x 3 bed homes (23 approved). The total number of units of 148 homes remains unchanged
    - the number of car parking spaces is reduced from 46 to 43 spaces, resulting in a parking ratio change from 0.31 spaces to 0.29 spaces
    - the number of cycle parking space is increased from 286 to 290
  - Housing is proposed to be delivered entirely as Build-to-Rent.
    - The affordable housing component is amended to 25% of units (23% of habitable rooms), all comprising Discounted Market Rent at 30% below market local rents for the ward and restricted to households on incomes of £60,000
  - There are no changes to the layout, massing, height or overall exterior appearance of the approved development. Changes to the buildings are internal.
- 5.4 Three buildings are proposed to be arranged around a courtyard to the centre of the site, with both soft and hard landscaping elements incorporating extensive planting and permeable paving.
- 5.5 Block A is proposed to be located on the site frontage to Green Street forming a continuation of the commercial façade to the immediate north, at the western edge of the site. This would take the form of a part 4- part 5-storey building incorporating commercial floorspace at ground floor levels and containing 19 flats.
- 5.6 Block B is proposed to be located at the north east corner of the site backing onto Brimsdown Station, and would be a part 8, part 16 storey building. Block B would contain 73 flats.
- 5.7 Block C is proposed to back onto the railway and would rise to a part 10, and part 12 storeys. There would be a two storey projection to the front of Block C, fronting Enstone Road that would incorporate commercial floorspace. Blocks B and C would also be connected to each other by a 2 storey podium that would principally contain car parking at ground and first floor levels accessed by a road along the southern boundary of the site. Block C would contain 56

flats.

## 6. Relevant Planning Decisions

Application Description	Reference	Status
Redevelopment of the site involving demolition of the existing buildings and erection of a mixed-use development ranging from 2 to 16 storeys comprising 148 residential units in three blocks, together with commercial floorspace (A1, A2, A3, B1, B2, B8, D1 and D2) at part ground / first floor levels together with substation, car parking, cycle parking, amenity areas, landscaping and associated works.	20/01526/FUL	28/03/2022 Granted with conditions and s106 agreement
Redevelopment of site involving demolition of existing buildings and erection of 175 self-contained units (comprising 53 x 1 bed, 104 x 2 bed and 18 x 3 bed) with flexible mixed use on the ground floor (A 1, A2, A3, B1 D1) within 2 blocks comprising (Block A, B and D up to 10 storey's and Block C up to 7 storey's) together with undercroft parking and associated landscaping and parking.	18/04935/FUL	12/09/2019 Application withdrawn
CAR PARK	TP/78/1435	26/01/1979 Granted With Conditions
LIFT HOUSING	TP/78/1280	26/10/1978 Granted With Conditions
USE AS WAREHOUSE	TP/71/1247	03/12/1971 Granted With Conditions
ENFIELD_II/718 FACTORY		14/11/1966 Approved
ENFIELD_II/662 SINGLE STOREY FACTORY		13/01/1964 Granted With Conditions

## 7. Consultations

### Statutory and Non-Statutory Consultees

#### 7.1 GLA

The GLA issued a Stage 1 report supporting the principle of redevelopment of the application site for residential use, however, advised non-compliance with the London Plan on the basis that the applicant had not demonstrated that the proposed 13% affordable housing by habitable room represented the maximum viable amount of affordable housing.

Officer response: The applicant undertook further viability work during the course of the present application. Following review by an independent viability expert on behalf of Enfield Council, the proposal for 25% affordable housing was deemed

to be reasonable in viability terms. The affordable housing offer has been reviewed in accordance with policy.

7.2 Health and Safety Executive

No objection. HSE issued a letter stating satisfaction with the fire safety design of the proposal.

7.3 NHS London Healthy Urban Development Unit

No objection. NHS HUDU updated the health provision contribution in line with the amendments.

7.4 Traffic and Transportation

No objection. The change to number of parking spaces is acceptable. The reduction in number of parking spaces is minimal and corresponds to the increase in number of one-bed and reduction in number of two- and three-bed units.

7.5 Housing

Housing officers acknowledge that the viability submission demonstrates that the site cannot deliver the consented 50% affordable housing or social rent as part of the amended proposal. On this basis, housing officers accept the proposal on the stipulation that there is provision for low incomes and the Council is able to secure nominations. Housing officers would like to see the 30% Discounted Market Rent maintained in line with local rents for the ward and restricted to households on incomes of £60,000. The annual housing costs of rent and service charges should be no greater than 40% of net income (assumed to be 70% of gross income) and capped at local housing allowance rents. The Council requires a Nominations Agreement secured in the Variation to the S106 Agreement to ensure the Council is able to let via the affordable provision.

7.6 LBE Building Control

No objection. Building Control officers agree with the HSE that the fire safety design is satisfactory, to the extent that it affects land use planning.

**Public Consultation**

7.7 Public consultation as a result of this planning application involved notification letters being sent to 622 neighbouring properties 3 October 2022, a press advert in the Enfield Independent was published 28 September 2022 and 2 site notices were erected 4 October 2022.

7.8 As a result of public consultation, 12 representations were received. All representations were letters of objection. The reasons for comment are summarised as follows:

- Affect local ecology
- Close to adjoining properties
- Community Infrastructure Levy funding
- Conflict with local plan

- Development too high
- General dislike of proposal
- Inadequate access
- Inadequate parking provision
- Inadequate public transport provisions
- Includes carbon reduction measures
- Increase danger of flooding
- Increase of pollution
- Loss of light
- Loss of parking
- Loss of privacy
- Noise nuisance
- Not enough info given on application
- More open space needed on development
- Other - give details
- Out of keeping with character of area
- Over development
- Strain on existing community facilities

7.9 The comments in the letters of objection relate to the proposal for the entire development, which was the subject of application 20/01526/FUL. The present application is an amendment of application 20/01526/FUL, limited to changes to the housing tenures, the proportion of affordable housing, the unit size mix, quantity of commercial space, numbers of parking spaces and numbers of bicycle spaces, and the addition of second stair cores in Blocks B and C. The proposed amendments are unrelated to the impacts cited in the public representations.

## **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, as per paragraph 8 of the NPPF:

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 recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 8.3 In relation to achieving appropriate densities paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
  - b) local market conditions and viability;
  - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
  - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
  - e) the importance of securing well-designed, attractive and healthy places.
- 8.4 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.
- 8.5 The NPPF sets out at Paragraph 11 a presumption in favour of sustainable development. For decision taking this means:
- “(c) approving development proposals that accord with an up-to-date development plan without delay; or
  - (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:
    - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed); or
    - (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.6 Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the

previous 3 years.”

- 8.7 The Council's recent housing delivery has been below 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.
- 8.8 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.
- 8.9 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.10 In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the “presumption in favour of sustainable development” category.
- 8.11 This is referred to as the “tilted balance” and the NPPF states that for decision- taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 8.12 The London Plan 2021
- The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant
- |     |   |
|-----|---|
| GG1 | Building Strong and Inclusive Communities |
| GG2 | Making the Best Use of Land               |
| GG3 | Creating a Healthy City                   |
| GG4 | Delivering the Homes Londoners Need       |

GG6	Increasing efficiency and resilience
D1	London's form, character and capacity for growth
D2	Infrastructure Requirements for Sustainable Densities
D3	Optimising Site Capacity through the Design-Led Approach
D4	Delivering Good Design
D5	Inclusive Design
D6	Housing Quality and Standards
D7	Accessible Housing
D8	Public Realm
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
SI8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.1	Residential Parking
T7	Deliveries, Servicing and Construction
T9	Funding Transport Infrastructure through Planning
DF1	Delivery of the Plan and Planning Obligations

### 8.13 Mayoral Supplementary Guidance

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.

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.

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.

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.

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

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

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

#### 8.14 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 Policy 16	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

#### 8.15 Local Plan – Development Management Document

DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More  
DMD3: Providing a Mix of Different Sized Homes  
DMD6: Residential Character  
DMD8: General Standards for New Residential Development

DMD9: Amenity Space  
DMD10: Distancing  
DMD37: Achieving High Quality and Design-Led Development  
DMD38: Design Process  
DMD43: Tall Buildings  
DMD44: Conserving and Enhancing Heritage Assets  
DMD45: Parking Standards and Layout  
DMD47: New Road, Access and Servicing  
DMD48: Transport Assessments  
DMD49: Sustainable Design and Construction Statements  
DMD50: Environmental Assessments Method  
DMD51: Energy Efficiency Standards  
DMD52: Decentralized energy networks  
DMD53: Low and Zero Carbon Technology  
DMD55: Use of Roofspace/ Vertical Surfaces  
DMD56: Heating and Cooling  
DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement  
DMD58: Water Efficiency  
DMD59: Avoiding and Reducing Flood Risk  
DND60: Assessing Flood Risk  
DMD61: Managing surface water  
DMD62: Flood Control and Mitigation Measures  
DMD64: Pollution Control and Assessment  
DMD65: Air Quality  
DMD68: Noise  
DMD69: Light Pollution  
DMD70: Water Quality  
DMD71: Protection and Enhancement of Open Space  
DMD72: Open Space Provision  
DMD73: Child Play Space  
DMD78: Nature conservation  
DMD79: Ecological Enhancements  
DMD80: Trees on development sites  
DMD81: Landscaping

8.16 North East Enfield Area Action Plan (2016)

Policy 5.1: Affordable Housing  
Policy 5.2: Mix of housing types  
Policy 5.3: Improving the public realm  
Policy 6.1: Improving existing industrial areas  
Policy 7.1: Providing community facilities  
Policy 9.1: Sustainable Energy  
Policy 19.1: Brimsdown Station Area - short term  
Policy 19.2: Brimsdown Station Area - Long term

8.17 Other Material Considerations

Enfield Climate Action Plan (2020)  
Enfield Housing and Growth Strategy (2020)  
Enfield Intermediate Housing Policy (2020)  
Enfield Biodiversity Action Plan  
Enfield Characterisation Study (2011)  
Enfield Local Heritage List (May 2018)  
Enfield S106 SPD (2016)

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

8.18 Enfield Draft New Local Plan and Draft Proposals Map

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. As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough's needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.

8.20 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.

8.21 Key local emerging policies from the plan are listed below:

Policy DM SE2 – Sustainable design and construction  
 Policy DM SE4 – Reducing energy demand  
 Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply  
 Policy DM SE7 – Climate change adaptation and managing heat risk  
 Policy DM SE8 – Managing flood risk  
 Policy DM SE10 – Sustainable drainage systems  
 Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting  
 Policy DM BG8 – Urban greening and biophilic principles  
 Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment  
 Policy DM DE2 – Design process and design review panel

Policy DM DE6 – Tall buildings

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

Policy DM DE10 Conserving and enhancing heritage assets

Policy DM DE11 – Landscape design

Policy DM DE13 – Housing standards and design

Policy DM H2 – Affordable housing

Policy DM H3 – Housing mix and type

Policy DM T2 – Making active travel the natural choice

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

## Analysis

### 9. Main Planning Issues

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

- Housing Need, Delivery and Quality
- Non-residential Land Use
- Fire Safety
- Biodiversity and Ecology
- Transport and Parking
- Energy
- Community Infrastructure Levy and S106

### 10. Housing Need, Delivery and Quality

#### *Principle of Residential Use*

- 10.1 The principle of bringing 241 Green Street forward as a residential development has been established in the approved planning application reference 20/01526/FUL. The present application maintains the proposal for 148 homes, as approved.
- 10.2 The use of the site for residential is reinforced by its inclusion as the Council's Draft Enfield Local Plan (Regulation 18) (2021) as Site Allocation SA34 for new homes and replacement employment floorspace. The Site Allocation estimates site capacity at 92 homes, plus employment re-provision. As a draft document, the emerging Local Plan carries lesser weight than adopted policy, however, it is recognised that the principle of residential use has been accepted and that the site is included in the borough's 5-Year Housing Land Supply.
- 10.3 The use of the site for the delivery of homes is not proposed to be changed and continues to be supported.

#### *Affordable Housing*

- 10.4 The NPPF (Paragraph 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 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.
- 10.5 Enfield's Housing and Growth Strategy 2020-2030 sets a priority to maximise housing delivery. 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 has 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). Ministry of Housing, Communities & Local Government (now called Department for Levelling Up, Housing and Communities) (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.

- 10.6 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.
- 10.7 London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable and industrial land appropriate for residential use delivering at least 50% affordable housing where there is a net loss in industrial land (Policy H4 (A)(5)). The extant permission confirmed the Application Site qualifies for the requirement to deliver 50% affordable housing by habitable rooms.
- 10.8 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. The Application Site falls within the Brimsdown Station Area of the North East Enfield Area Action Plan (2016). Policy 5.1 states that new development should follow the affordable housing requirement of the Core Strategy, and further, given viability issues in the Plan area, "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." 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.
- 10.9 It should be restated that Enfield is in a category of "presumption in favour of sustainable development" having failed to meet at minimum 75% of its housing targets in the preceding three years – meaning homes that have received permission to be built are not being constructed and completed at a rate that delivers needed housing. In practical terms this is referred to as the "tilted balance" and the NPPF states that for decision-making this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This also means that Development Plan policies carry lesser weight and applications for new homes are given greater or "tilted" weight. 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.
- 10.10 The present application seeks to amend the approved quantity of affordable housing from 50% of habitable rooms and 49% of units to 23% of habitable rooms (93 of 400 habitable rooms) and 25% of units (37 of 148 units).
- 10.11 London Plan Policy H5 sets out a threshold approach to planning applications which trigger an affordable housing requirement. As already noted, Policy H4

requires 50% of habitable rooms as affordable on industrial sites that are suitable for housing, which applies to the Application Site. In the case of the application that is being amended, reference 20/01526/FUL, the application was made via the Fast Track Route of the threshold approach and was not required to provide a viability assessment at application stage. The original application proposed 50% of habitable rooms as affordable housing and this quantum was secured through the S106 agreement.

- 10.12 As the applicant now proposes to amend the quantity of affordable housing to an amount that no longer meets the threshold requirement in London Plan Policy H5, the need is triggered to follow the Viability Tested Route.
- 10.13 The applicant undertook a viability appraisal, which has been reviewed by an independent viability specialist on behalf of Enfield Council in accordance with relevant policy and guidance, including the Mayor's Affordable Housing and Viability SPG and draft Affordable Housing and Development Viability London Plan guidance. The latter document states under paragraph 2.3.3 that "Where it is accepted that the viability of a site should be considered as part of an application, the decision-maker should determine the weight to be given to a viability assessment having regard to whether the local Development Plan and the viability evidence underpinning it are up to date, and considering the transparency of the evidence supporting the viability assessment."
- 10.14 The Council's independent viability consultant found the offer to be reasonable in viability terms. It should be recognized that, following further viability work, the affordable housing component increased from 13% initially to 25% as presently proposed and set out in this report. The consultant recommended that a pre-implementation and late stage review be secured in a S106 agreement.
- 10.15 Being in the category of "presumption in favour of sustainable development", Enfield's Development Plan is deemed to be out of date. Further, Enfield's Core Strategy (2010) and Development Management Document (2014) both exceed the five-year time limit established by NPPF paragraph 33 to review and update plans as necessary. This also means that the evidence supporting these plans is out-of-date. Under these circumstances, it is reasonable to allocate significant weight to the viability of the site in consideration of the present application.
- 10.16 In light of the "tilted" balance that applies, as well as all material considerations, including the site's viability, the challenges to housing delivery in Enfield and evidenced need for affordable housing, officers accept the proposal for 25% affordable housing.

#### *Build-to-Rent*

- 10.17 The extant permission is for development of 148 units comprising a combination of London Affordable Rent, Intermediate Market Rent and market rent or sale units. The applicant proposes to amend the housing product to 100% Build-to-Rent units (which will include a proportion of Discount Market Rate, discussed under the affordable housing consideration.)
- 10.18 Build to Rent is a form of rental housing that is controlled by requirements set out in London Plan Policy H11. This form of housing is an alternative to unregulated private rent units, or private market sale units. Build to Rent offers higher-quality, managed and regulated rental housing that may be more readily available to residents than for-sale homes.

- 10.19 In order to qualify as Build to Rent housing, London Plan Policy H11 stipulates that the housing must meet a set of criteria:
- i. the development, or block or phase within the development, has at least 50 units
    - *This criterion is met as the proposal is for 148 units*
  - ii. the homes are held as Build to Rent under a covenant for at least 15 years
  - iii. a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
  - iv. all the units are self-contained and let separately
    - *Units have been designed to be self-contained, as included in plans for approval*
  - v. there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
  - vi. longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
  - vii. the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked
  - viii. there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence
  - ix. providers have a complaints procedure in place and are a member of a recognised ombudsman scheme
  - x. providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

Criteria ii. through to x. will be secured in the Variation to the S106 Agreement to ensure the development meets policy requirements for Build to Rent.

- 10.20 London Plan paragraph 4.11.1 advises that “boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes.”
- 10.21 Build to Rent development offers a level of security to builders as the model does not rely on the sale of market homes, where developers need to invest up-front capital and realise an immediate return, which brings risk in variable market conditions. Instead, the model attracts institutional investors for whom longer term returns (via rent) are preferable. For the Council, this provider security supports housing delivery – particularly where Enfield has failed its statutory Housing Delivery Test, placing it in the Government’s “presumption in favour of sustainable development category”.
- 10.22 For residents, Build to Rent homes provide valuable security by providing longer-term tenancies, better management standards, and rent and service charge certainty for the period of the tenancy. This is a considerable improvement over the conventional private rent stock, where there is no regulation of landlords or housing quality.
- 10.23 The emerging Enfield Local Plan Policy H7, although having limited weight as it is a draft plan, supports Build to Rent where schemes:

- i. provide high quality housing and a mix of dwelling sizes that meet identified local and strategic housing needs;
- ii. offer tenancies over at least a three-year period;
- iii. provide on-site affordable housing in perpetuity in the form of Discounted Market
- iv. Rent at genuinely affordable rent level;
- v. provide homes held over at least 15 years under covenant to be secured through a section 106 legal agreement. A claw-back mechanism will apply in accordance with London Plan policy;
- vi. provide a review mechanism in the event that policy compliant levels of affordable housing cannot viably be provided; and
- vii. provide a management plan, committing to high standards of ongoing management of the premises.

10.24 These stipulations are consistent with adopted policy in the London Plan. The draft Local Plan recognizes Build to Rent provides a valuable addition by widening the type of homes available in Enfield, assisting in producing additional homes to meet overall targets and likely driving up standards for tenants in market rented homes.

10.25 Enfield's Housing and Growth Strategy 2020-2030 sets five ambitions, the first of which is "More affordable homes for local people" and the third of which is "Quality and variety in private sector housing". The Strategy states "We will also prioritise the development of homes through Build to Rent schemes meeting the emerging demand for this tenure." And with respect to why Build to Rent will be supported by the Council, "Developments are built especially with the needs of renters in mind – quality design, decent management and tenure security. This will be a feature in our regeneration schemes going forward."

10.26 As an amendment in housing product from the 2020 permission, which delivers a combination of London Affordable Rent, Intermediate Market Rent and market rent or sale units (the permission does not stipulate whether the market units are rental or sale units), to Build to Rent is an improvement in the type of housing, particularly among market-rate units. Build to Rent ensures a higher quality of building management, accountability by the operator and greater security for tenants to take up longer tenancies and understand rents and fees through transparent standards.

10.27 Officers support the provision of Build to Rent homes with the development of 241 Green Street, and see this housing type as a planning benefit, especially among market-rate units as the rents to be secured would be set 30% below market rates of the ward.

### *Housing Tenures*

10.28 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.

- 10.29 Enfield Core Policy 3 and DMD Policy 1 stipulate a borough-wide affordable housing ratio of 70% social rented and 30% intermediate provision.
- 10.30 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.
- 10.31 The development proposes all of the 37 affordable homes to be Discounted Market Rent, discounted at 30% below market rents.

*Proposed affordable tenure mix*

<b>Low-cost</b>	<b>Intermediate</b>
0 (0%)	37 homes (100%)

- 10.32 This an intermediate form of affordable housing. London Plan Policy H11 governs Build to Rent and states that “Where a development meets the criteria set out in Part B [Build to Rent criteria], the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent...”
- 10.33 Policy 4.1 of the London Housing Strategy (2018) sets out what the Mayor accepts as being genuinely affordable homes. Under criterion B, it states:
- “The Mayor will support intermediate rented homes for Londoners on middle incomes who do not have enough savings to access mainstream or affordable home ownership. This will include:
- i. using his funding and planning powers to deliver new London Living Rent homes to help private renters save for a deposit to buy a home; and
  - ii. supporting a range of other types of intermediate rented homes as long as they are genuinely affordable to Londoners, generally meaning that they should be accessible by those whose household incomes fall under £60,000.”
- 10.34 Discounted Market Rent is delivered and managed by the Build to Rent provider and delivered without grant, rather than being operated by a Registered Provider or a council. The DMR units must be fully integrated into the development and be indistinguishable from market units.
- 10.35 The proposal to provide all 37 units of affordable housing as an intermediate tenure does not accord with London Plan policy, which calls for affordable housing tenures to be provided as 30% social rent, 30% intermediate product and 40% in line with evidenced need.
- 10.36 However London Plan Policy H11, which concerns Build to Rent, anticipates that affordable housing will be provided as Discounted Market Rents – which are an intermediate product. The proposed affordable housing offer complies with this policy. This form of affordable housing is fully integrated and does not introduce challenges around separate management, separate entrances and cores, which contribute to a more efficient use of floorspace and save area for housing and affordable housing.
- 10.37 Further, this application has been viability tested to assess the maximum amount of affordable housing the development can deliver. The viability

submission concluded that the development can provide 25% of units and 23% of habitable rooms as Discounted Market Rent homes at a discounted rate of 30% below market rents. This allows for the greatest proportion of units as affordable housing. Clearly, the inclusion of homes at a greater depth of affordability, such as social rent units, would reduce the breadth of affordability to a level below 25%.

- 10.38 The affordable units are located across the development. The entirety of Block A is proposed to be DMR, comprising 19 units. Eight DMR units are located in Block B on floors 2, 3, 6 and 7. Ten DMR units are located in Block C on floors 2 through 6. The units identified as DMR in Blocks B and C are well located, overlooking the roof open space amenity over the commercial unit on Block C and car park connecting Blocks B and C. The units are west- and south-facing and well-integrated into the building floorplans. In order to ensure the DMR units are fitted to an equivalent standard to market units, a condition is recommended that the units are tenure blind.
- 10.39 In review of the affordable housing proposal, housing officers have stipulated that the rent will need to be maintained in line with local rents for the ward and restricted to households on incomes of a maximum of £60,000. The annual housing costs of rent and service charges should be no greater than 40% of net income (assumed to be 70% of gross income) and capped at local housing allowance rents. As DMR is administered by the Build to Rent provider, a Nominations Agreement will have to form part of the S106 to ensure the Council is able to let the affordable provision. These stipulations will be captured in the Variation to the S106 Agreement.
- 10.40 The S106 agreement will also secure an early stage viability review and a late stage viability review. In the event that viability improves, these obligations would enable a greater breadth or depth of affordability.
- 10.41 The proposal for affordable housing has been viability tested and it is found, with confirmation from the Council's independent viability consultant, the affordable housing component is sound in viability terms – meaning the DMR is deliverable and in accordance with adopted planning policy. London Plan Policy H11 supports intermediate tenure DMR housing as the affordable housing product that is delivered with Build to Rent developments. In consideration of these factors, as well as the fact that the intermediate affordable housing complies with the Mayor's definition of genuinely affordable housing and the DMR tenure enables the greatest number (proportion) of homes to be affordable to Enfield's middle income residents, the proposal for DMR units is supported.

#### *Dwelling Mix*

- 10.42 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.
- 10.43 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.

10.44 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

10.45 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 housing are households without children.

10.46 The approved mix of unit sizes across tenures is as follows:

Housing Mix and Tenure	1Bed/2pers (Hab Rooms)	2Bed/3pers (Hab Rooms)	2Bed/4pers (Hab Rooms)	3Bed/5pers (Hab Rooms)	Total Units (Hab Rooms)	% By Unit (Hab Rooms)
London Aff. Rent	11(22)	1(3)	22(66)	12(60)	46(151)	50%(51%)
Interm. Mkt Rent	15(30)	4(12)	8(24)		27(66)	
Private	28(56)	6(18)	30(90)	11(47)	75(211)	50%(49%)
<b>Total</b>	<b>54(108)</b>	<b>11(33)</b>	<b>60(180)</b>	<b>23(107)</b>	<b>148(428)</b>	<b>100%(100%)</b>

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

*Proposed dwelling mix*

	1b/2p		2b/3p		2b/4p		3b/4p		3b/5p		TOTAL
DMR	22	59%	5	14%	6	16%	0	0%	4	11%	37
Market	41	37%	19	17%	42	38%	6	5%	3	3%	111
<b>Total</b>	<b>63</b>	<b>43%</b>	<b>24</b>	<b>16%</b>	<b>48</b>	<b>32%</b>	<b>6</b>	<b>5%</b>	<b>7</b>	<b>4%</b>	<b>148</b>

10.48 Since the development was approved under application reference 20/01526/FUL, there have been changes to fire safety requirements announced by the National Fire Chiefs Council, formalised through a consultation by the Government on 23 December 2022 and, in February 2023, through an announcement by the GLA requiring second staircases in

buildings over 30 meters. This new requirement impacted two segments of the proposed development, Blocks B and C. The application for the Section 73 had already been submitted when the changes were introduced, requiring the applicant to revise the application in accordance with the fire safety guidance. The second stairs in the two blocks were incorporated within the approved massing and, as such, no changes to the building's external appearance, massing or height is proposed. However, the addition of the stair cores resulted in the reduction in size of some units:

- Block A remains unamended as there is no introduction of a second stair
- Block B: cycle store is reconfigured and there is a change in unit layouts largely comprising the loss of a bathroom, a modest reduction in unit size, or consolidation of smaller units (one- and two-bedroom) to provide three bedroom units.
- Block C: some car parking is displaced, and there is a change in unit layouts largely comprising the loss of a bathroom and conversion of some three-bedroom units to two-bedrooms

In summary, the changes to unit sizes from the extant permission across all tenures are as follows:

*Difference in unit sizes from extant permission*

<b>1b/2p</b>	<b>2b/3p</b>	<b>2b/4p</b>	<b>3b/4p</b>	<b>3b/5p</b>
+9	+13	-12	+6	-16

- 10.49 Taken as a whole, the proposed dwelling size mixes 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. While the proposed mix deviates from need, it is largely consistent with the mix in the approved scheme.
- 10.50 Looking at the individual tenures, the market housing disproportionately proposes 1-bed and 2-bed homes, and underprovides family-sized 3- and 4- bedroom, for which there is a greater evidenced need. It is noted that the majority of 2-bedroom units is for four people, or smaller families.
- 10.51 The application concentrates provision of affordable housing in the intermediate tenure, which is accepted by officers, as discussed in the preceding section. The size mix proposed for the DMR units complies with evidenced need, providing over half of intermediate units as 1-bedroom homes and 30% as 2-bedroom homes. This is in line with the highest need. Four (11%) 3-bedroom units are proposed. While 3-bedroom units are in medium need, the provision of family-sized homes is welcomed.
- 10.52 While the market-rate homes deviate from evidenced need, policy accepts that the evidenced proportions cannot be delivered in every development, and the applicant has given particular priority to ensuring the affordable units are sized where there is greatest need. Build to Rent is also a unique product to other private rent and private sale housing products. 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. 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.

- 10.53 In view of the fact that the mix of affordable intermediate homes complies with policy, and there is mix of market rate homes with a large proportion of 2-bed/4-person units and nine 3-bedroom units, officers are broadly supportive of the proposed size mix.

*Quality of accommodation*

- 10.54 Although the exterior appearance of the development is not proposed to be amended, the addition of stair cores has resulted in changes to residential floor layouts and unit arrangements.
- 10.55 The layout changes were found by officers to be modest and there is no material change to aspects, meeting space standards, outlook or accessibility. The applicant adjusted layouts in response to design officers' comments and the arrangements are now considered to be acceptable. Comments included improvements to cycle store layouts, landscaping and arrangements of living areas and kitchen areas.

**11. Non-residential land use**

- 11.1 The proposal for flexible commercial units remains unchanged in location, floor space and uses.
- 11.2 There have been changes to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 since the application related to the extant permission reference was submitted. For completeness, the present application will reconcile the changes to use classes in order to ensure that the present permission being sought is up-to-date and accords with current use classes.
- 11.3 The present permission is for flexible commercial uses that include use classes A1; A2; A3; B1; B8; D1 (except for as a place of worship); and D2. The present amendment will adjust these use classes to maintain flexibility. As part of the present application, commercial spaces will be permitted to be occupied by use class E. The update to use classes does not introduce any changes to the proposed commercial or non-residential uses.

**12. Fire Safety**

- 12.1 London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 12.2 This application is submitted with a Fire Strategy Statement (9 March 2023).
- 12.3 Since the development was approved under application reference 20/01526/FUL, there have been changes to fire safety requirements announced by the National Fire Chiefs Council, formalised through a consultation by the Government on 23 December 2022 and, in February 2023, through an announcement by the GLA requiring second staircases in buildings over 30 meters. This change required the

addition of second stairs in Blocks B and C.

- 12.4 Additionally, the Health and Safety Executive (HSE) is now the statutory consultee on matters of fire safety for buildings of 18m or 7 storeys in height, whichever is reached first.
- 12.5 HSE issued a letter stating that the authority is satisfied with the fire safety design, to the extent that it affects land use planning.
- 12.6 The submission was additionally reviewed by LBE Building Control who agreed with the HSE.
- 12.7 The addition of second stair cores in Blocks B and C is strongly supported. It is recommended that a planning condition is included requiring compliance with the Fire Strategy to accord with London Plan Policy D12 and DMPO 2015.

### **13. Biodiversity and Ecology**

- 13.1 The NPPF (Paragraph 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.
- 13.2 Condition 44 of the extant permission reference 20/01526/FUL requires the applicant to provide a baseline biodiversity level calculation and a report confirming the percentage increase of biodiversity in line with London Plan Policy G6. It is recommended that a condition is included requiring confirmation that the completed scheme provides the level of biodiversity outlined in the report.
- 13.3 The existing permission reference 20/01526/FUL is also supported by an Urban Greening Factor calculation. It is recommended that a condition is included requiring confirmation that the completed scheme provides the level of urban greening consistent with the calculation.

### **14. Energy**

- 14.1 London Plan Policy SI 2 Minimising greenhouse gas emissions requires monitoring of energy demand and carbon emissions in major developments to ensure that planning commitments are being delivered. At the time the approved application was considered at Planning Committee, the 2021 London Plan had not yet been adopted. To ensure policy compliance and for completeness, the obligation to undertake energy monitoring is now proposed to be captured in the Variation to the S106 Agreement.

## 15. Transport and Parking

- 15.1 The proposed amendment results in the reduction of three car parking spaces in Block C, which are displaced by a new stair core. This reduces car parking from a total 46 approved to 43 spaces proposed and changes the parking space to residential unit ratio from 0.31 to 0.29. The number of bicycle parking spaces is increased from 286 to 290.
- 15.2 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. 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. Enfield 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.
- 15.3 Transport officers advise that the changes in loss of parking spaces is minimal and does not introduce any negative impacts. There is no loss of accessible car parking. The addition of three bicycle spaces is positive. These changes comply with policy, which encourages sustainable modes of transport and reduction in car use. Brimsdown Station is 125 metres from the site and the Route 307 bus stop is immediately across the street.
- 15.4 The existing permission includes conditions requiring details of a Car Parking Management Plan, as well as details of the siting and design of secure covered cycle parking facilities. These conditions be carried over to the new permission.

## 16. S106 Heads of Terms

- 16.1 The extant permission reference 20/01526/FUL is subject to a Section 106 agreement. If approved, the present application for amendments will require a Deed of Variation to the original S106 Agreement to include obligations introduced by the amendments and updates to policy since the original decision was issued. The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within the variation to the S106 Agreement. (The contributions stemming from the present amendments are italicized.)

Heads of Terms	Description
<i>Affordable Housing</i>	<i>Overall quantity, tenure and size mix, early stage and late stage viability.</i>
<i>Build to Rent</i>	<i>Criteria in London Plan Policy H11</i>
Green Street / Enstone Road enhancement / Transport related works	Secure enhancement to the public realm along the Green Street and Enstone Road frontage including new parking provision and access driveway crossing and related highway works to be discussed with officers.
Travel	<ul style="list-style-type: none"> <li>• Travel Plan</li> <li>• Travel Plan monitoring</li> <li>• CPZ</li> <li>• Car Club membership</li> <li>• Car Club space</li> </ul>
Energy	<ul style="list-style-type: none"> <li>• Carbon Offset Payment towards the Carbon Offset Fund</li> <li>• <i>Monitoring ('Be Seen' – GLA Energy Monitoring Portal)</i></li> </ul>

Education	Education contribution
Management	Appointment of Managing Agents to operate a management company
Employment	<ul style="list-style-type: none"> <li>• Contribution payable in line with Chapter 13 of Enfield's S106 Supplementary Planning Document</li> <li>• Employment and Skills Strategy</li> </ul>
Health	Contribution towards health provision
Monitoring fee	Payment of the Council's costs associated with monitoring of the S106 agreement

## 17. Community Infrastructure Levy (CIL)

- 17.1 Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 17.2 The total amount of CIL owed is £1,531,654, although this figure does not account for social housing relief, which, once calculated, will reduce the CIL liability. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

## 18. Conclusion

- 18.1 The introduction of second stairs in Blocks B and C of the consented project brings incalculable benefit to the safety of the buildings and its occupants. This is an essential amendment, although it has consequential impacts. The stair cores have cut into floor plates, resulting in a reduction and reconfiguration of floorspace with an amended unit mix. The applicant has sought to make the changes within the approved massing so as not to affect the exterior design of the buildings. The application also seeks to modify the housing product and affordable housing component to bring it in line with a viability-tested level.
- 18.2 The reduction in affordable housing provision from 50% of habitable rooms (49% of units) as approved to 23% of habitable rooms (25% of units) is notable. The application demonstrates, through a viability assessment, that the present permission is not practicable and the amendments to housing type and affordable component will enable the project to move forward.
- 18.3 Having failed the statutory Housing Delivery Test, Enfield is in a position of "presumption in favour of sustainable development category", which means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Under the present application, the provision of Build to Rent housing brings planning benefit as a beneficial housing type, which is an improvement from unregulated rental housing. Build to Rent is supported. The proposed breadth (25% of units) and depth (30% below local market rents) of affordable housing provides an intermediate-level affordable housing in a size mix that meets Enfield's evidenced needs.
- 18.4 Enfield's 2020 Housing Delivery Action Plan cites only 60% of Enfield's approvals being implemented. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. The application reveals that the present permission is not currently viable. In order to improve the deliverability of this emerging site allocation for homes, the present proposal helps to render the development achievable. Early and late stage viability reviews will ensure that changing conditions enable the maximum affordable housing benefit is achieved.

- 18.5 The housing proposal deviates from policy in affordable housing tenures. All 37 affordable units are proposed as intermediate Discounted Market Rate homes. While this departs from policy that also seeks low-cost social accommodation, Build to Rent policy anticipates deliver of intermediate-rate homes as it maximises the breadth of affordable housing and can be managed within the Build to Rent typology efficiently. The viability submission confirms that this intermediate tenure achieves the greatest number of affordable units.
- 18.6 The unit size mix also departs from policy, although the mix is generally in line with the proportions of the unit mix approved under the extant permission and the unit mix proposed for the affordable housing component meets evidenced need.
- 18.7 On balance, the amendments to the approved application reference 20/01526/FUL introduce a safer, viable, deliverable and secure form of housing, including a considerable 25% of units as intermediate affordable housing. This application is recommended for approval.

Date: 20th May 2023  
Reference: 230520 - Pro\_Scheme\_Area\_Schedule.



Amended Issue to LPA comments and request details  
20th June 2023  
Residential GIA

Floor Level	Plot Number	Unit Size	Flat Type	GIA (m <sup>2</sup> )	Hab Rooms	Tenure (Affordable)	Tenure (Market)
<b>Block A</b>							
1	A 1.1	2B4P	FT A-A	74.1	3	1	
1	A 1.2	3B5P	FT A-B	92.5	4	1	
1	A 1.3	1B2P	FT A-C	50.3	2	1	
1	A 1.4	2B3P	FT A-D	66.2	3	1	
1	A 1.5	2B4P	FT A-E	74.7	3	1	
Subtotal				357.8	15	5	0
2	A 2.1	2B4P	FT A-A	74.1	3	1	
2	A 2.2	3B5P	FT A-B	92.5	4	1	
2	A 2.3	1B2P	FT A-C	50.3	2	1	
2	A 2.4	2B3P	FT A-D	66.2	3	1	
2	A 2.5	2B4P	FT A-E	74.7	3	1	
Subtotal				357.8	15	5	0
3	A 3.1	2B4P	FT A-A	74.1	3	1	
3	A 3.2	3B5P	FT A-B	92.5	4	1	
3	A 3.3	1B2P	FT A-C	50.3	2	1	
3	A 3.4	2B3P	FT A-D	66.2	3	1	
3	A 3.5	2B4P	FT A-E	74.7	3	1	
Subtotal				357.8	15	5	0
4	A 4.1	2B3P	FT A-F	68.6	3	1	
4	A 4.2	1B2P	FT A-G	52	2	1	
4	A 4.3	1B2P	FT A-H	50.5	2	1	
4	A 4.4	1B2P	FT A-I	55.8	2	1	
Subtotal				226.9	9	4	0
<b>Block A Total (Units)</b>					54	19	0
<b>Total Block A (Areas)</b>				1300.3			

<b>Block B</b>							
2	B 2.1	2B4P	FT B-A	74.5	3		1
2	B 2.2	2B4P	FT B-B	75.5	3		1
2	B 2.3	2B3P	FT B-C	63.1	3	1	
2	B 2.4	1B2P	FT B-D	50.6	2	1	
2	B 2.5	1B2P	FT B-E	52	2	1	
2	B 2.6	2B4P	FT B-F	81	3		1
Subtotal				396.7	16	3	3
3	B 3.1	2B4P	FT B-A	74.5	3		1
3	B 3.2	2B4P	FT B-B	75.5	3		1
3	B 3.3	3B5P	FT B-G	89	4		1
3	B 3.4	3B5P	FT B-H	95	4	1	
3	B 3.5	2B4P	FT B-F	81	3		1
Subtotal				415	17	1	4
4	B 4.1	2B4P	FT B-A	74.5	3		1
4	B 4.2	2B4P	FT B-B	75.5	3		1
4	B 4.3	3B5P	FT B-G	89	4		1
4	B 4.4	3B5P	FT B-H	95	4		1
4	B 4.5	2B4P	FT B-F	81	3		1
Subtotal				415	17	0	5
5	B 5.1	2B4P	FT B-A	74.5	3		1
5	B 5.2	2B4P	FT B-B	75.5	3		1
5	B 5.3	3B5P	FT B-G	89	4		1
5	B 5.4	3B5P	FT B-H	95	4		1
5	B 5.5	2B4P	FT B-F	81	3		1
Subtotal				415	17	0	5
6	B 6.1	2B4P	FT B-A	74.5	3		1
6	B 6.2	2B4P	FT B-B	75.5	3		1
6	B 6.3	3B4P	FT B-I	81	4		1

Date: 20th May 2023

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Amended Issue to LPA comments and request details

20th June 2023

6	B 6.4	1B2P	FT B-J	50	2	1	
6	B 6.5	1B2P	FT B-K	50	2	1	
6	B 6.6	2B4P	FT B-F	81	3		1
Subtotal				412	17	2	4
7	B 7.1	2B4P	FT B-A	74.5	3		1
7	B 7.2	2B4P	FT B-B	75.5	3		1
7	B 7.3	3B4P	FT B-I	81	4		1
7	B 7.4	1B2P	FT B-J	50	2	1	
7	B 7.5	1B2P	FT B-K	50	2	1	
7	B 7.6	2B4P	FT B-F	81	3		1
Subtotal				412	17	2	4
8	B 8.1	1B2P	FT B-N	50	2		1
8	B 8.2	2B4P	FT B-B	75.5	3		1
8	B 8.3	3B4P	FT B-I	81	4		1
8	B 8.4	1B2P	FT B-J	50	2		1
8	B 8.5	1B2P	FT B-L	50	2		1
8	B 8.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
9	B 9.1	1B2P	FT B-N	50	2		1
9	B 9.2	2B4P	FT B-B	75.5	3		1
9	B 9.3	3B4P	FT B-I	81	4		1
9	B 9.4	1B2P	FT B-J	50	2		1
9	B 9.5	1B2P	FT B-L	50	2		1
9	B 9.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
10	B 10.1	1B2P	FT B-N	50	2		1
10	B 10.2	2B4P	FT B-B	75.5	3		1
10	B 10.3	3B4P	FT B-I	81	4		1
10	B 10.4	1B2P	FT B-J	50	2		1
10	B 10.5	1B2P	FT B-L	50	2		1
10	B 10.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
11	B 11.1	1B2P	FT B-N	50	2		1
11	B 11.2	2B4P	FT B-B	75.5	3		1
11	B 11.3	3B4P	FT B-I	81	4		1
11	B 11.4	1B2P	FT B-J	50	2		1
11	B 11.5	1B2P	FT B-L	50	2		1
11	B 11.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
12	B 12.1	1B2P	FT B-O	51	2		1
12	B 12.2	2B4P	FT B-P	71.7	3		1
12	B 12.3	2B3P	FT B-Q	65	3		1
12	B 12.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
13	B 13.1	1B2P	FT B-O	51	2		1
13	B 13.2	2B4P	FT B-P	71.7	3		1
13	B 13.3	2B3P	FT B-Q	65	3		1
13	B 13.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
14	B 14.1	1B2P	FT B-O	51	2		1
14	B 14.2	2B4P	FT B-P	71.7	3		1
14	B 14.3	2B3P	FT B-Q	65	3		1
14	B 14.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
15	B 15.1	1B2P	FT B-O	51	2		1
15	B 15.2	2B4P	FT B-P	71.7	3		1
15	B 15.3	2B3P	FT B-Q	65	3		1
15	B 15.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
<b>Block B Total (Units)</b>					205	8	65
<b>Total Block B (Areas)</b>				4897.3			

Date: 20th May 2023  
Reference: 230520 - Pro\_Scheme\_Area\_Schedule.



Amended Issue to LPA comments and request details  
20th June 2023

Block C							
2	C 2.1	2B4P	FT C-A	71	3		1
2	C 2.2	2B3P	FT C-B	61.4	3		1
2	C 2.3	2B3P	FT C-C	71.1	3		1
2	C 2.4	1B2P	FT C-D	51.6	2	1	
2	C 2.5	1B2P	FT C-E	56.4	2	1	
2	C 2.6	1B2P	FT C-F	56.7	2	1	
Subtotal				368.2	15	3	3
3	C 3.1	2B4P	FT C-A	71	3		1
3	C 3.2	2B3P	FT C-G	66.2	3		1
3	C 3.3	2B4P	FT C-H	80	3		1
3	C 3.4	1B2P	FT C-D	51.6	2	1	
3	C 3.5	1B2P	FT C-E	56.4	2	1	
3	C 3.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	2	4
4	C 4.1	2B4P	FT C-A	71	3		1
4	C 4.2	2B3P	FT C-G	66.2	3		1
4	C 4.3	2B4P	FT C-H	80	3		1
4	C 4.4	1B2P	FT C-D	51.6	2	1	
4	C 4.5	1B2P	FT C-E	56.4	2	1	
4	C 4.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	2	4
5	C 5.1	2B4P	FT C-A	71	3		1
5	C 5.2	2B3P	FT C-G	66.2	3		1
5	C 5.3	2B4P	FT C-H	80	3		1
5	C 5.4	1B2P	FT C-D	51.6	2	1	
5	C 5.5	1B2P	FT C-E	56.4	2	1	
5	C 5.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	2	4
6	C 6.1	2B4P	FT C-A	71	3		1
6	C 6.2	2B3P	FT C-G	66.2	3		1
6	C 6.3	2B4P	FT C-H	80	3		1
6	C 6.4	1B2P	FT C-D	51.6	2	1	
6	C 6.5	1B2P	FT C-E	56.4	2		1
6	C 6.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	1	5
7	C 7.1	2B4P	FT C-A	71	3		1
7	C 7.2	2B3P	FT C-G	66.2	3		1
7	C 7.3	2B4P	FT C-H	80	3		1
7	C 7.4	1B2P	FT C-D	51.6	2		1
7	C 7.5	1B2P	FT C-E	56.4	2		1
7	C 7.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	0	6
8	C 8.1	1B2P	FT C-L	50	2		1
8	C 8.2	2B3P	FT C-G	66.2	3		1
8	C 8.3	2B4P	FT C-H	80	3		1
8	C 8.4	1B2P	FT C-D	51.6	2		1
8	C 8.5	1B2P	FT C-J	51	2		1
8	C 8.6	1B2P	FT C-K	54	2		1
Subtotal				352.8	14	0	6
9	C 9.1	1B2P	FT C-L	50	2		1
9	C 9.2	2B3P	FT C-G	66.2	3		1
9	C 9.3	2B4P	FT C-H	80	3		1
9	C 9.4	1B2P	FT C-D	51.6	2		1
9	C 9.5	1B2P	FT C-J	51	2		1
9	C 9.6	1B2P	FT C-K	54	2		1
Subtotal				352.8	14	0	6
10	C 10.1	1B2P	FT C-M	61	2		1
10	C 10.2	1B2P	FT C-N	52.3	2		1
10	C 10.3	2B3P	FT C-O	64	3		1
10	C 10.4	1B2P	FT C-P	50	2		1
Subtotal				227.3	9	0	4
11	C 11.1	1B2P	FT C-M	61	2		1
11	C 11.2	1B2P	FT C-N	52.3	2		1
11	C 11.3	2B3P	FT C-O	64	3		1
11	C 11.4	1B2P	FT C-P	50	2		1
Subtotal				227.3	9	0	4
<b>Block C Total (Units)</b>					141	10	46
<b>Total Block C (Areas)</b>				3514.9			



Date: 20th May 2023

Reference: 230520 - Pro\_Scheme\_Area\_Schedule.



Amended Issue to LPA comments and request details

20th June 2023

## Commercial GIA

Block	Floor Level	Unit	GIA (m <sup>2</sup> )
A	0	1	317.5
B	0	2	66.1
C	0	3	352.5
C	1	3	394.5
<b>Total</b>			<b>1130.6</b>

## Other Areas

Block	Floor Level	Unit Type	NIA (m <sup>2</sup> )
A	0	Flexible Commercial	251.1
A	0	bins 1	7.2
A	0	bins 2	15.7
A	0	Core bins	21.8
A	0	Cycle Store	29.3
A	0	Plant	36.4
A	0	Core Plant	8.7
<b>Subtotal</b>			<b>370.2</b>
B	0	Flexible Commercial	66.2
B	0	Core Lobby	57.8
B	0	Core Bins	31.8
B	0	Sub-station	21.9
B	0	Switch Room	11.7
B	0	room	11.7
B	0	Cycle Store	78.2
B	1	Boiler Plant	124.2
B	2	Water Plant	33
<b>Subtotal</b>			<b>436.5</b>
C	0	Commercial	261.4
C	0	Cycle Store 1	39.8
C	0	Cycle Store 2	56.2
C	0	Core Lobby	55.2
C	0	Bins	15.6
C	0	Core Bins	34.6
C	0	Safety Room	8.6
C	1	Commercial	373
C	1	Plant Room	21.8
B & C	0	Parking	665.9
B & C	1	Parking	682
<b>Subtotal</b>			<b>2214.1</b>
<b>Total</b>			<b>3020.8</b>

Date: 20th May 2023

Reference: 230520 - Pro\_Scheme\_Area\_Schedule



Amended issue to LPA comments and request details

20th June 2023

## Residential Units

Floor Level	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Hab Rooms	Tenure (Affordable)	Tenure (Market)
<b>Block A</b>									
Ground	-	-	-	-	-	-	-	-	-
First	1	1	2	-	1	5	15	5	0
Second	1	1	2	-	1	5	15	5	0
Third	1	1	2	-	1	5	15	5	0
Fourth	3	1	-	-	-	4	9	4	0
<b>TOTAL</b>	<b>6</b>	<b>4</b>	<b>6</b>	<b>0</b>	<b>3</b>	<b>19</b>	<b>54</b>	<b>19</b>	<b>0</b>

<b>Block B</b>									
Ground	-	-	-	-	-	-	-	-	-
First	-	-	-	-	-	-	-	-	-
Second	2	1	3	-	-	6	16	3	3
Third	-	-	3	-	2	5	17	1	4
Fourth	-	-	3	-	2	5	17	0	5
Fifth	-	-	3	-	2	5	17	0	5
Sixth	2	-	3	1	-	6	17	2	4
Seventh	2	-	3	1	-	6	17	2	4
Eighth	3	1	1	1	-	6	16	0	6
Ninth	3	1	1	1	-	6	16	0	6
Tenth	3	1	1	1	-	6	16	0	6
Eleventh	3	1	1	1	-	6	16	0	6
Twelfth	2	1	1	-	-	4	10	0	4
Thirteenth	2	1	1	-	-	4	10	0	4
Fourteenth	2	1	1	-	-	4	10	0	4
Fifteenth	2	1	1	-	-	4	10	0	4
<b>TOTAL</b>	<b>26</b>	<b>9</b>	<b>26</b>	<b>6</b>	<b>6</b>	<b>73</b>	<b>205</b>	<b>8</b>	<b>65</b>

<b>Block C</b>									
Ground	-	-	-	-	-	-	-	-	-
First	-	-	-	-	-	-	-	-	-
Second	3	2	1	-	-	6	15	3	3
Third	2	1	3	-	-	6	16	2	4
Fourth	2	1	3	-	-	6	16	2	4
Fifth	2	1	3	-	-	6	16	2	4
Sixth	2	1	3	-	-	6	16	1	5
Seventh	2	1	3	-	-	6	16	0	6
Eighth	4	1	1	-	-	6	14	0	6
Ninth	4	1	1	-	-	6	14	0	6
Tenth	3	1	-	-	-	4	9	0	4
Eleventh	3	1	-	-	-	4	9	0	4
<b>TOTAL</b>	<b>27</b>	<b>11</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>56</b>	<b>141</b>	<b>10</b>	<b>46</b>

<b>TOTAL UNITS</b>									
Floor Level	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Hab Rooms	Tenure (Affordable)	Tenure (Market)
<b>BLOCK A</b>	<b>6</b>	<b>4</b>	<b>6</b>	<b>0</b>	<b>3</b>	<b>19</b>	<b>54</b>	<b>19</b>	<b>0</b>
<b>BLOCK B</b>	<b>26</b>	<b>9</b>	<b>26</b>	<b>6</b>	<b>6</b>	<b>73</b>	<b>205</b>	<b>8</b>	<b>65</b>
<b>BLOCK C</b>	<b>27</b>	<b>11</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>56</b>	<b>141</b>	<b>10</b>	<b>46</b>
<b>TOTAL</b>	<b>59</b>	<b>24</b>	<b>50</b>	<b>6</b>	<b>9</b>	<b>148</b>	<b>400</b>	<b>37</b>	<b>111</b>

Date: 20th May 2023

Reference: 230520 - Pro\_Scheme\_Area\_Schedule,

Amended Issue to LPA comments and request details  
 20th June 2023

## Tenure Breakdown

	UNITS	Percentage
AFFORDABLE	37	25%
MARKET	111	75%
Percentage	100%	

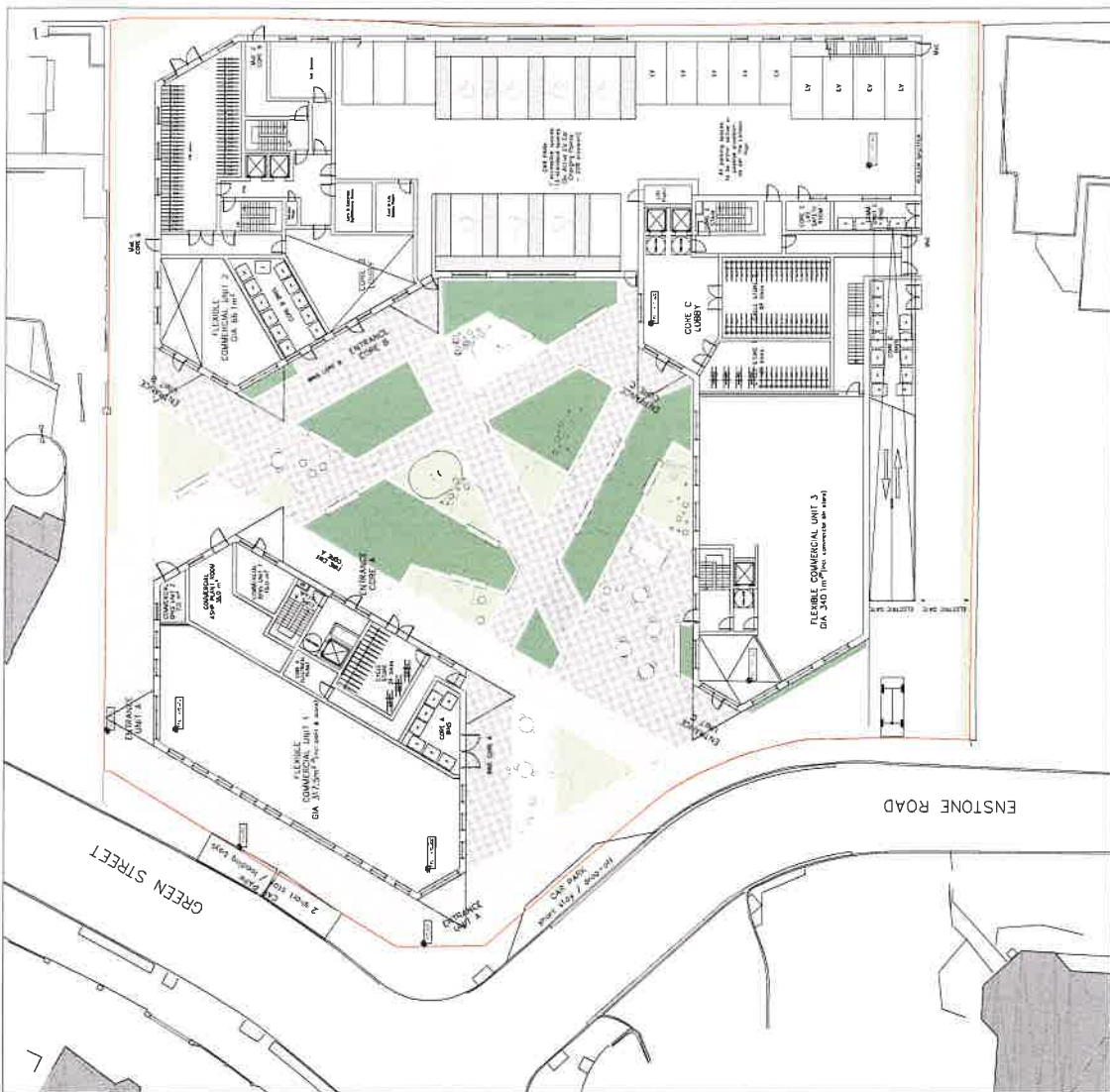
	HABITABLE ROOMS	Percentage
AFFORDABLE	93	23%
MARKET	307	77%
Percentage	100%	

AFFORDABLE							
	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Percentage
BLOCK A	6	4	6		3	19	13%
BLOCK B	6	1	0		1	8	5%
BLOCK C	10					10	7%
Percentage	15%	3%	4%	0%	3%	25%	

MARKET							
	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Percentage
BLOCK A						0	0%
BLOCK B	24	8	24	6	3	65	44%
BLOCK C	17	11	18			46	31%
Percentage	28%	13%	28%	4%	2%	75%	

**NOTES**

1. All floor levels are shown. Site areas only when a site plan is required. All dimensions are to be taken to the centre of the wall unless otherwise stated. All dimensions are to be taken to the centre of the wall unless otherwise stated. All dimensions are to be taken to the centre of the wall unless otherwise stated.



Rev A - 05/05/23 - TL - AT - Amended to LPA comments

Project: **PLANNING**

Client: **Stonesgate**

Address: **Green Street, Enfield**

Project Name: **Proposed Floor plans Ground Floor Plan**

Drawing No: **1560 PL-1210**

Scale: **A**

**accord**

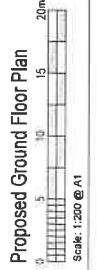
Architect: **accord**

Address: **accord**

Phone: **accord**

Email: **accord**

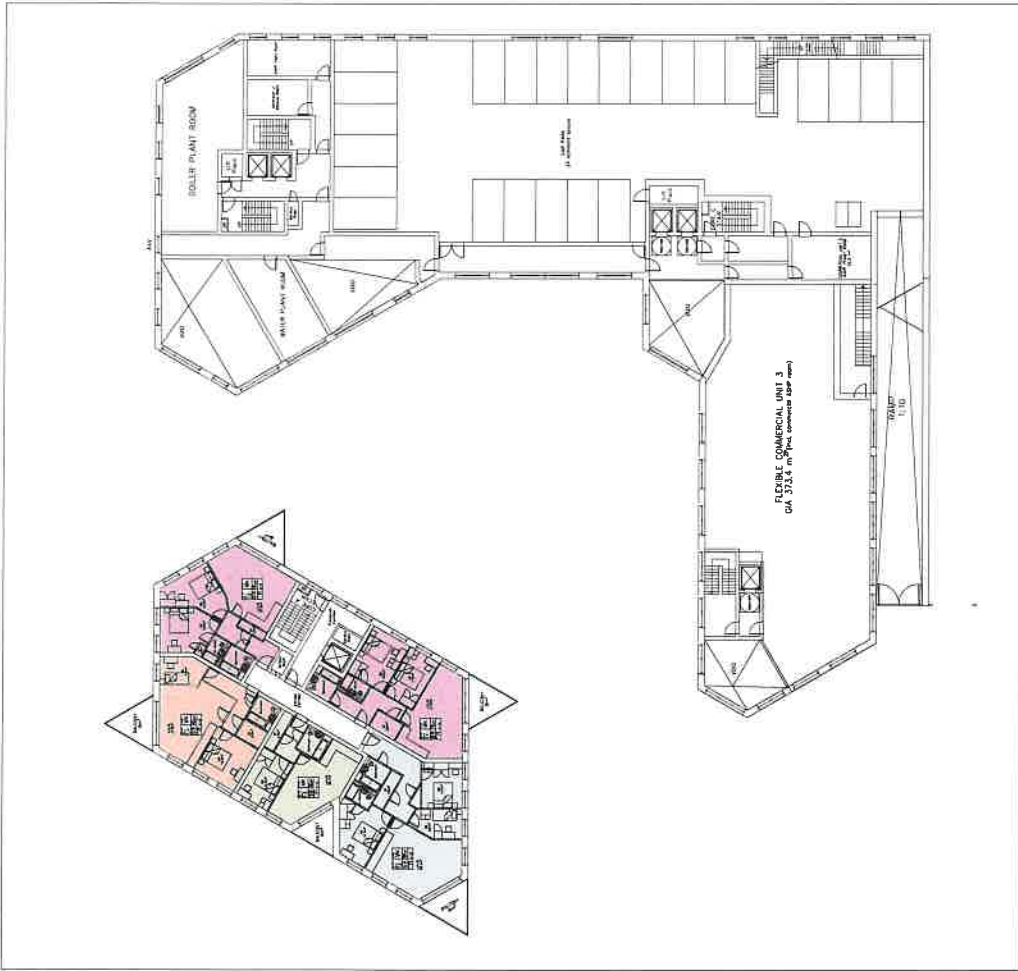
Website: **accord**



NOTES

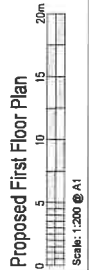
1. All spaces are shown with their intended use. The architect is not responsible for the accuracy of the information provided by the client. The architect is not responsible for the accuracy of the information provided by the client.

- 1 bed 2 people
- 2 bed 3 people
- 2 bed 4 people
- 3 bed



Plan A - 1560 PL 1211 - A1 - Approved by LPA comments

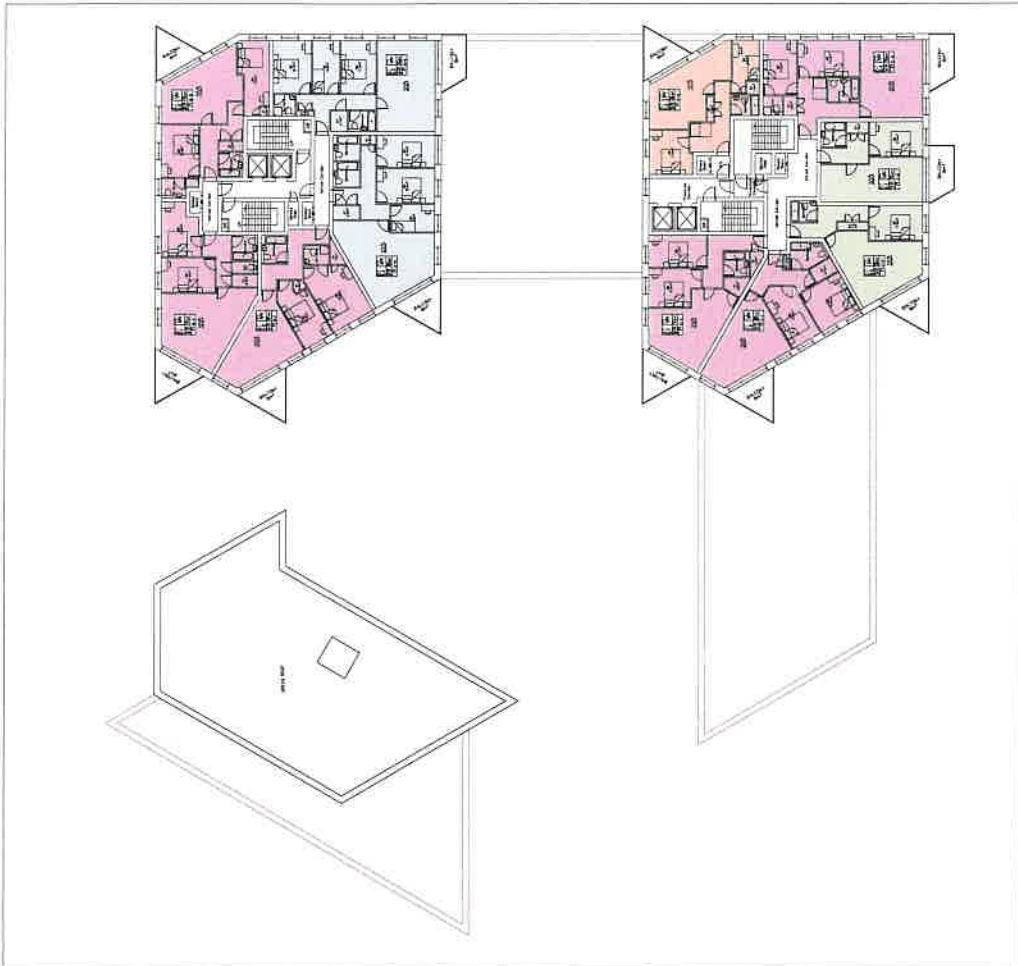
**PLANNING**  
 Project: Stonegate  
 Location: Green Street, Enfield  
 Drawing No: Proposed Floor Plans  
 First Floor Plan  
 Date: 15/03/2023  
 Drawing No: 1560.PL.1211  
 Scale: A



NOTES

Use typical dimensions, floor areas and room volumes for the proposed development. The proposed development should be designed to meet the requirements of the relevant standards. All dimensions should be given in metres. Round the figures off at the nearest millimetre.

- 1 bed 2 people
- 2 bed 3 people
- 2 bed 4 people
- 3 bed



Rev A - 06/05/23 - TL - Amended to LPA comments

Rev No: 01 - Civil Description

Project: PLANNING

Project: Stonegate

Project: Green Street, Enfield

Project: Proposed Floor plans

Project: 7/101 Floor Plan

Project: 1560.PL.1215

Project: A

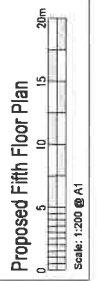
Project: accord

Project: 1560.PL.1215

Project: A

Project: accord

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NOTES

Use legend to identify units. Units are marked with color and size. Dimensions are given in meters to the nearest 100mm. All dimensions are to the center of the unit unless otherwise stated. Refer to the drawing title or report for more information.

1 bed 2 people



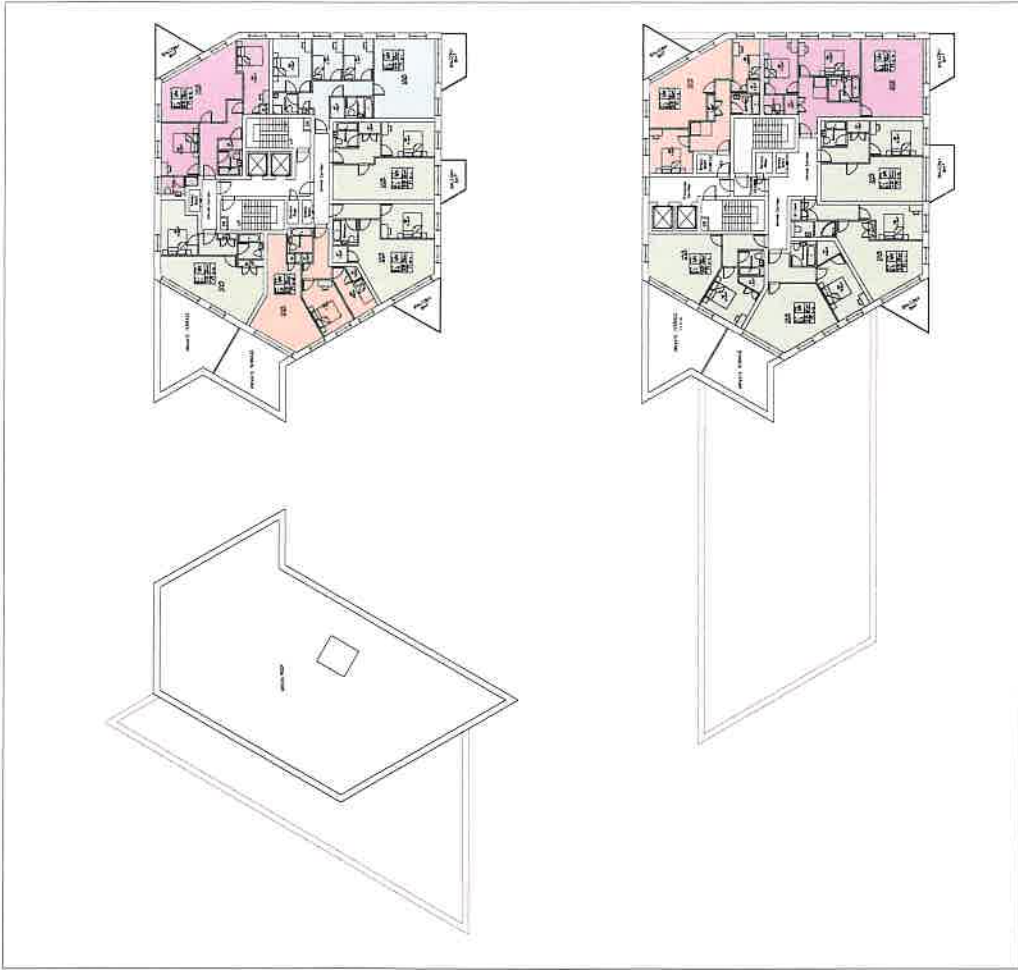
2 bed 3 people



2 bed 4 people



3 bed



Rev A - 05/05/23 - TL - AT - Amended to DPA comments

Project Name: PLANNING

Project: Stonegate

Address: Green Street, Enfield

Drawing Title: Proposed Floor Plans

Drawing Number: Eighth Floor Plan

Date: 05/05/23

Scale: 1:1200

Author: TL

Checked: AT

Version: A



Accord Planning & Design Ltd, 100-102, The Quadrant, Enfield, London EN2 6NQ. Tel: 020 846 1234. Email: info@accordplanning.co.uk







<b>LONDON BOROUGH OF ENFIELD</b>		
<b>PLANNING COMMITTEE</b>	<b>Date:</b> 18 July 2023	
<b>Report of</b> Director of Planning & Growth: Brett Leahy	<b>Contact Officers</b> Case Officer: Dino Ustic Area Manager: Sharon Davidson	<b>Category</b> Full Application - Major
<b>Ward</b> Cockfosters	<b>Councillor Request</b> Cllr Georgiou	
<b>LOCATION:</b> 368 Cockfosters Road, Barnet, EN4 0JT		
<b>APPLICATION NUMBER:</b> 21/02546/FUL		
<b>PROPOSAL:</b> Redevelopment of site and erection of a 2/3 storey block of 14 flats together with landscaping and parking.		
<b>Applicant Name &amp; Address:</b> Nicon Developments Limited 45 Silver Street Enfield EN1 3EF	<b>Agent Name &amp; Address:</b> Mr Graham Fisher 1 Woodlands Avenue Wanstead E11 3RA	
<b>RECOMMENDATION:</b>  1. That subject to the completion of a S106 Agreement to secure the obligations set out in this report, 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 conditions to cover the matters in the Recommendation section of this report and the final S106 Agreement to cover the matters identified in the S106 Contributions section of the report.		

Ref: 21/02546/FUL LOCATION: 368 Cockfosters Road, Barnet, EN4 0JT.



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Scale 1:1250



**1. Note for Members:**

- 1.1 This application is reported to the Planning Committee as it comprises a 'major' development for more than 10 residential units. Cllr Georgiou also requested the application be reported to Planning Committee if officers were recommending approval.

**2. Recommendation**

- 2.1 That subject to the completion of a S106 Agreement to secure the obligations set out in this report, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions.

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

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

2. The development hereby permitted relates to the application site and plans submitted as part of this application as follows:

Drawings

**Drawings**

- 4828/PA/01
- 4828/PA/02
- 4828/PA/03
- 4828/PA/04
- 4828/PA/05A
- 4828/PA/06
- 4828/PA/10D
- 4828/PA/11F
- 4828/PA/12C
- 4828/PA/13D
- 4828/PA/14A
- 4828/PA/20B
- 4828/PA/21A
- 4828/PA/22D
- 4828/PA/24
- 4828/PA/25
- 4828/PA/26B
- 4828/PA/27B
- 4828/PA/28A
- 4828/PA/29A

- CWLD-ND-CR-LA-638-01-A1 REV D
- CWLD-ND-CR-LA-638-02-A3 REV A
- CWLD-ND-CR-LA-638-03-A3 REV A
- CWLD-ND-CR-LA-638-04-A3 REV A

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

3. No development above existing ground level shall commence until details of the external finishing materials to be used shall be approved in writing by the Local Planning Authority. A schedule of materials and their use in the approved scheme is required and samples made available on site. A photograph and details of the make and model must be submitted. The development shall be constructed in accordance with the approved details

Reason: To ensure a satisfactory external appearance.

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

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

5. The development shall not commence until details of 26 secure and covered long stay cycle parking spaces and one short stay space have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details before it is occupied.

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

6. The development shall not commence until the specification details for the provision of at least 3 active electric vehicle charging points and the remainder to be passive have been submitted to and approved in writing by the Local Planning Authority. The charging points shall be installed in accordance with the approved details prior to occupation.

Reason: To ensure that the development complies London Plan

7. The site shall be enclosed in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The means of enclosure

shall be erected in accordance with the approved details before the development is occupied.

Reason: To ensure satisfactory appearance and safeguard the privacy, amenity and safety of adjoining occupiers and the public and in the interests of highway safety.

8. The development shall not commence until details of areas of hard and soft landscaping and the position, species, approximate height and spread of all trees and shrubs to be planted ( minimum 6 replacement trees to be planted) and of those to be retained; fencing, walls and any other means of enclosure (including facilities for refuse storage) have been submitted to and approved in writing by the Local Planning Authority; any new trees or retained trees or shrubs dying, being severely damaged or becoming seriously diseased so as to prejudice their long term survival within 5 years of completion in the development to be replaced with identical species at the owners expense, to the reasonable satisfaction of the Local Planning Authority.

Reason: to ensure the satisfactory appearance of the development by securing a sufficiency of suitable new and retained landscaping and by providing for the replacement of failed planting.

9. No development shall take place until a Construction Management Plan, written in accordance with the Mayor of London's supplementary planning guidance 'The Control of Dust and Emissions During Construction and Demolition' detailing how dust and emissions will be managed during demolition and construction work shall be submitted to the Local Planning Authority for approval. Once approved the Construction Management Plan shall be fully implemented for the duration of any demolition and construction works.

Reason: To protect the local amenity from demolition/construction dust

10. The development shall not commence until details of how drainage from the hardstanding will be prevented from discharging towards the public highway. The surfacing and drainage measures shall be carried out in accordance with the approved detail before the development is occupied unless otherwise agreed with the Local Planning Authority.

Reason: To ensure water does not drain towards the highway

11. 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 policy SI 1.

12. The development shall be constructed/adapted so as to provide sufficient air-borne and structure-borne sound insulation against externally generated noise and vibration. This 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 per night. A scheme for mitigation measures shall be submitted to and approved by the Local Planning Authority prior to development taking place. The scheme of mitigation shall include suitable alternative ventilation where the internal noise levels exceed the sound pressure levels stated in this condition with the windows open. The approved mitigation scheme shall be implemented in its entirety before any of the units are occupied/the use commences and take into account the Acoustics Ventilation & Overheating Guidance issued by the ANC and IOA.

Reason: To protect the local amenity from noise and disturbance

13. The development shall not be occupied until a scheme to deal with the contamination of the site including an investigation and assessment of the extent of contamination and the measure to be taken to avoid risk to health and the environment has been submitted to and approved in writing by the Local Planning Authority. Remediation shall be carried out in accordance with the approved scheme and the Local Planning Authority provided with a written warranty by the appointed specialist to confirm implementation prior to the occupation of development.

Reason: To avoid risk to public health and the environment.

14. 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.

15. The development shall not commence until a revised Sustainable Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The details shall be based on the disposal of surface water by means of a sustainable drainage system in accordance with the principles as

set out in the Technical Guidance to the National Planning Policy Framework and should be in line with our DMD Policy SuDS Requirements:

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

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

16. No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

17. The development shall not be carried out other than in complete accordance with the submitted details of the HWA10467\_APIII 3.0 dated March 2022 and Drw: CWLD-ND-CR-LA-638-01 Rev C demonstrating how trees to be retained shall be protected during construction work. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area.

18. Not less than 10% of residential units shall be constructed to wheelchair accessible requirements (Building Regulations M4(3)) and the remainder shall meet easily accessible/adaptable standards (Building Regulations M4(2)).

Reason: To ensure suitable facilities for disabled users and to future proof homes.

19. Prior to occupation of development, an energy report confirming the CO<sub>2</sub>/yr (using SAP 10) savings over Part L of Building regulations (2013) and following the Be lean, Be clean, Be green reduction measures demand measures shall be submitted and approved in writing by the Local planning authority. The development shall be completed in accordance with the approved details.

Reason: In the interest of sustainable development and to ensure London is a carbon zero city via CO<sub>2</sub> emission reduction targets accordance with Policy SI 2 of the London Plan (2021), Policy CP20 of the Enfield Core Strategy (2010) and Policy DMD51 of the Enfield Development Management Document (2014).

20. The development shall be carried out in accordance with the measures identified in the Cherryfield Ecology Report, dated 17/02/2021. Before the development is first occupied, the developer shall submit to the Local Planning Authority evidence confirming the provision of 2 bat boxes to be provided on trees and bird and insect boxes shall be provided which include 2 robin boxes, 2 songbird boxes, 2 urban bee nesting boxes and 2 bug biome boxes have been provided.

Reason: In order to promote ecological enhancement measures in the interests of the wider built and natural environment and to comply with the requirement of adopted Council policy.

21. Prior to the commencement of development on site further bat surveys for existing buildings on site shall be undertaken by a suitably qualified ecologist within the May to August window and be submitted to and approved in writing by the Local Planning Authority. If surveys identify the existence of bats within the buildings to be demolished, evidence shall be submitted to demonstrate the necessary license has been secured to enable the demolition to be undertaken.

#### **Informative(s)**

1. All works to the highway ie amendments to the vehicular access, will need to be undertaken by the Council's Highway Services team, who should be contacted on the footway crossing helpdesk (020 8379 2211) as soon as possible so that the required works can be programmed.
- 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 and the final S106 Agreement to cover the matters identified in the S106 Contributions section of the report

### **3. Executive Summary**



- 3.1 This is a full application for the redevelopment of site and erection of a 2/3 storey block of 14 flats (5 x 3 bedroom , 4 x 2 bedroom , 5 x 1 bedroom) together with landscaping and parking.
- 3.2 The application follows a previous outline consent for redevelopment of the site granted in April 2023 for erection of a three storey block of (9) nine flats (OUTLINE-Access).
- 3.3 Although a more intensive development of the site the current proposal successfully amplifies the scale of the previous scheme and delivers a height, scale and massing that would be appropriate in the street scene without adversely impacting upon the amenity of existing nearby residents.
- 3.4 The planning application satisfies planning policy aims to increase the housing stock of the borough and is considered to be acceptable subject to appropriate planning conditions.
- 3.5 The application does not provide for the delivery of affordable housing on site. However, an independent viability assessment on behalf of the Council confirms that the development can viably meet the costs of CIL and deliver a contribution of £498,891 towards affordable housing delivery off site.
- 3.6 The Government prescribes a “tilted balance” to the Council’s planning decision-making in favor of housing delivery 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 Council should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. Officers consider that there are no adverse impacts of the scheme that would outweigh the benefits of the proposed housing.
- 3.7 It is recognised that small and medium windfall 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 current application that seeks to provide 14 new good quality residential units on the site, is an example of such optimisation and carries significant weight in favor of the proposed development.

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

- 4.1 The site lies on the western side of Cockfosters Road and comprises a detached two storey dwelling set within a large plot. To the south and the west of the site are large predominantly 2 storey detached houses on Coombehurst Close. To the east of Cockfosters Road, facing the site, are open fields. The two immediate neighbours are flatted developments consisting of Kingsdale Court & Amara Lodge.
- 4.2 The properties along Cockfosters Road are primarily large houses and flatted developments with broadly a 20m setback from the adopted highway and rear gardens of approximately the same length. The rear garden of the application site is

smaller than that of the neighbouring occupiers (due to the applicant apportioning off the rear section).

- 4.3 The site is subject to a site wide Tree Preservation Order (TPO). There are thirty-eight (38) trees and eight (8) groups of trees which have been categorised within or immediately adjacent the site. Six trees and two groups of trees which fall within category C are to be removed.
- 4.4 The site is within a PTAL 1a indicating a poor access to public transport and accessibility. The existing building on site is not listed nor is the site located within a Conservation Area

## 5. Proposal

- 5.1 Full planning permission is sought for the redevelopment of the site and erection of a 2/3 storey block of 14 flats (5 x 3 bedroom, 4 x 2 bedroom, 5 x 1 bedroom), together with landscaping and parking.

- 5 x 3 bedroom (Unit 2, Unit 3, Unit 5, Unit 7, Unit 9) = 35.7%
- 4 x 2 bedroom (Unit 1, Unit 6, Unit 8, Unit 10) = 28.6%
- 5 x 1 bedroom (Unit 4, Unit 11, Unit 12, Unit 13, Unit 14) = 35.7%

- 5.2 The application follows on from pre-application advice with the following changes:

- Proposals now incorporate 4 x duplex units over the lower ground and ground floors, with an increase in number of 3 bedroom flats to 5 units, of which 4 units are 5 or 6 person flats/duplexes.
- All 2 bedroom flats have been reconfigured to provide 4 person units.
- Reconfiguration of the plans so the majority of the flats are dual aspect.
- Reduction in the number of car parking spaces from 15 to 14, which enables a greater retention of trees.
- The forecourt and frontage has been substantially redesigned in order to significantly increase the amount of landscaping and reduce visual impact of parking
- The reconfiguration has allowed for the inclusion of separate pedestrian and vehicle entrance gates, and the relocation of the pedestrian gate allows for a direct route through the site to the building entrance.
- Cycle provision has been reconfigured to provide secure and attractive storage.

## 6. Relevant Planning Decisions

- 6.1 The following planning history is considered relevant to the proposal:

Reference	Proposal	Decision	Date
22/00900/OUT	Erection of a three storey block of nine flats (OUTLINE- Access).	Committee- Granted with	27.04.2023

		conditions.	
20/03899/PREAPP	Redevelopment of site and erection of 14 residential units (FOLLOW UP TO 20/01796/PREAPP and 20/02665/PREAPP)	Closed	12.01.2021
20/02665/PREAPP	Redevelopment of site and erection of 14 residential units (FOLLOW UP TO 20/01796/PREAPP).	Closed	20.08.2020
20/01796/PREAPP	Redevelopment of site and erection of 14 residential units.	Closed	16.07.2020

## 7. Consultations

### 7.1 Statutory and non-statutory consultees

#### Environmental Health

- 7.1.1 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. However, the development is surrounded by residential properties and demolition and construction dust could be an issue. Relevant conditions are therefore required.

Officer comment: Conditions to cover construction management, including dust controls, are included in the recommendation above

#### Trees

- 7.1.2 No objection is raised, subject to the provision of the detailed tree protection scheme that includes an auditable schedule of arboricultural supervision/inspection and soil analysis, as detailed in HWA10467\_APIII 3.0 dated March 2022 and Landscaping scheme Drw: CWLD-ND-CR-LA-638-01 Rev C submitted in support of the proposed scheme. A condition is recommended to secure this

#### SUDS

- 7.1.2 Objection is raised to the development because the proposed drainage strategy does not meet the requirements of DMD Policy 61 with regard to quality, functionality, quality and suitability.

Officer comment: Whilst an objection is noted, the matter can be covered by condition and a condition is recommended requiring the submission of updated drainage strategy prior to the commencement of development.

#### Transportation

- 7.1.4 The proposed development makes appropriate provision for access and parking having regard to DMD Policies 8, 45 and 46 and The London Plan Policy T6 and no objections are raised. The development, given the number of units proposed will however generate the requirement for a Sustainable Transport Contribution. The contribution sought being £11,042 which will be secured through the S106 Agreement.

#### Thames Water

- 7.1.5 With regard to Waste Water and Sewage infrastructure capacity, no objection is raised. The proposed development is located within 15 metres of a strategic sewer and therefore Thames Water requests a piling condition to be added to any planning permission.

Officer comment – a condition regarding piling is included in the recommendation section above

## 7.2 Public

- 7.2.1 Consultation letters were sent to 112 adjoining and surrounding properties . Consultation ran from 11.11.2021 to 05.12.2021. At the time of writing the report, there have been 7 objections raising all or some of the following points:

- Notice not served to adjoining occupiers and therefore insufficient time to make comments

Officer comment: The development does not encroach beyond the boundaries of the application site and neighbouring properties did not need to be served with a Notice prior to the submission of the application. Consultation has taken place as part of the planning application with 112 adjoining and surrounding properties notified of the application.

- The TPO's around the site should be maintained.
- Noise and dust
- Light
- Increase in congestion
- Landscaping / Screening
- Overdevelopment
- Height, bulk & scale
- Out of keeping within character of the area
- Amenity Space provision appears slight
- Overlooking / loss of privacy
- Close proximity to boundary with Amara Lodge

Officer comment: These issues are responded to in the body of the report

- The length of building works to be completed .
- Potential de-value of property value –

Officer comment: These issues are not material planning considerations

- Potential encroachment of new building right to boundary

Officer comment: The development does not encroach beyond the boundaries of the application site.

- LPA should seek independent financial viability advice on the affordable housing

Officer comment: This has been done.

## 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 The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:
- (c) approving development proposals that accord with an up-to date development plan without delay; or, (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.”
- 8.3 The related footnote(8) advises that “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites ..... or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.
- 8.4 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.5 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development”.
- 8.6 The Council's recent housing delivery has been below its increasing housing targets. This translated into the Council being required to prepare a Housing Action Plan in 2019 and more recently being placed in the “presumption in favour of sustainable development” category by the Government through its Housing Delivery Test.
- 8.7 This is referred to as the “tilted balance” and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole - – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’.

- 8.8 However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 200 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 8.9 Key relevant policy objectives from the NPPF that relate to this scheme include: • Section 5 – Delivering a sufficient supply of homes Para 60 – 77; • Section 11 – Making effective use of land Para 119 -125; and • Section 12 – Achieving well-designed places, Para 126-136 8.11

#### The London Plan (2021)

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

Policy GG1: Building strong and inclusive communities  
Policy D1: London's form, character and capacity for growth  
Policy D3: Optimising site capacity through the design-led approach  
Policy D4: Delivering good design  
Policy D5: Inclusive design  
Policy D6: Housing Quality and Standards  
Policy D12: Fire Strategy  
Policy D14: Noise  
Policy H4: Delivering Affordable Housing  
Policy H6: Affordable Housing Tenure  
Policy H7: Monitoring of Affordable Housing  
Policy SI 1: Improving Air Quality  
Policy SI 2: Minimising greenhouse gas emissions  
Policy SI 5: Water Infrastructure  
Policy SI 7: Reducing waste and supporting the circular economy  
Policy SI 8: Waste capacity and net waste self-sufficiency  
Policy SI 13: Sustainable Drainage  
Policy SI2: Healthy Streets  
Policy T3: Transport capacity, connectivity and safeguarding  
Policy T4: Assessing and mitigating transport impacts  
Policy T5: Cycling  
Policy T6: Car parking  
Policy G2: London's Green Belt  
Policy G6: Biodiversity and Access to Nature  
Policy G7: Trees and Woodlands

#### Enfield Core Strategy (2010)

- 8.12 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:

CP3 Affordable Housing  
CP4 Housing Quality  
CP5 Housing Types  
CP9 Supporting community cohesion  
CP20 Sustainable Energy Use and Energy Infrastructure  
CP21 Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure  
CP22 Delivering Sustainable Waste Management  
CP24 The Road Network  
CP25 Pedestrian and Cyclists  
CP28 Managing Flood Risk Through Development  
CP30 Maintaining and improving the quality of the built and open environment  
CP32 Pollution  
CP36 Biodiversity

Enfield Development Management Document (2014)

8.13 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:

DMD1 Affordable Housing on Sites Capable of Providing 10 units or more  
DMD3 Providing a Mix of Different Sized Homes  
DMD6 Residential Character  
DMD8 General Standards for New Residential Development  
DMD9 Amenity Space  
DMD10 Distancing  
DMD37 Achieving High Quality and Design-Led Development  
DMD45 Parking Standards and Layout  
DMD47 Access, New Roads and Servicing  
DMD50 Environmental Assessment Methods  
DMD51 Energy Efficiency Standards  
DMD61 Managing Surface Water  
DMD79 Ecological Enhancements  
DMD80 Trees on Development Sites  
DMD81 Landscaping  
DMD83 Development Adjacent to Green Belt

8.14 Other relevant policy

National Planning Policy Framework (NPPF)  
National Planning Practice Guidance (NPPG)  
Enfield Characterisation Study (2011)  
Waste and Recycling Storage Planning Guidance from Enfield Council (EN20/ V2)  
S106 SPD  
Hadley Wood Neighbourhood Plan –

Policy HW-1: Setting, character and views  
Policy HW-2: Front boundary walls, railings and gates  
Policy HW-3: Paving of front gardens  
Policy HW-4: Off-street parking  
Policy HW-7: Trees, the natural environment and biodiversity  
Policy HW-8: Flood risk  
Policy HW-9: Sustainable drainage

Policy HW-10: New housing development and mix  
Policy HW-11: Self-contained apartments  
Policy HW-12: High-Quality Built Environment  
Policy HW-15: Construction activity  
Policy HW-18: Active travel  
Policy HW-19: CIL Allocations

Hadley Wood Neighbourhood Plan is currently undergoing consultation and therefore carries very limited weight for the assessment of the planning application

## **9. Assessment**

9.1 The aspects considered within the proposal are as follows:

- Principle of development
- Character and Appearance
- Housing Mix
- Affordable housing
- Design
- Standard of Accommodation
- Residential Amenity
- Transportation
- Trees, Biodiversity and Landscaping
- Energy & Sustainability
- Noise and Construction Dust
- Sustainable Drainage & Flood Risk
- S106 obligations / viability

### **9.2 Principle of development**

9.2.1 The NPPF and London Plan advise that local authorities should seek to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

9.2.2 The Borough's current target for the plan period is for a minimum of 12,460 net housing completions between 2019/20 – 2028/29, as set out in the London Plan 2021, 1246 dwellings per year. In the event that the proposed development was acceptable in all other respects, the proposed 14 new units would make a positive contribution towards meeting the strategic housing needs of Greater London and increasing the housing stock of the Borough in accordance with the National Planning Policy Framework (NPPF) and the Policy CP5 of the Enfield Core Strategy (2010). In this context, it is acknowledged the redevelopment of the site could help delivery and contribute to the Council's substantial housing delivery targets which is welcome.

9.2.3 It is also recognised that the Council has failed the most recent Housing Delivery Test and therefore, residential development is subject to the presumption in favour of sustainable development. The tilted balance therefore has to be applied in assessing and weighing up the benefits of the scheme and whether on balance the impacts of not granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.

9.2.4 Overall, the principle of development for a block of 14 self-contained flats in the proposed location is acceptable subject to the assessment criteria as set out within the below.



### **9.3 Character and appearance**

- 9.3.1 The fundamental aim of the NPPF is to secure sustainable development. In order to achieve sustainable development, a development is required to have a good design. Policy D3 of the London Plan encourages the design-led approach that optimises the capacity of sites. DMD 6 of the DMD provides standards for new development with regards to scale and form of development, housing quality and density.
- 9.3.2 DMD 8 provides general standards for new residential development and reiterates the requirement for a development to be of an appropriate scale, mass and bulk, provide high quality amenity space and provide access to parking and refuse areas. DMD 37 encourages achieving a high quality and design led development. This policy is re-iterated by CP30 of the Core Strategy as well as the fundamental aims of the NPPF. Policy CP30 seeks to maintain and improve the quality of the built and open environment. DMD 83 states that proposal located next to or within close proximity to, the Green Belt will only be permitted where there is no increase in visual dominance and intrusiveness of built form, clear distinction between the Green Belt and urban area and views from the Green Belt especially at important access points are maintained.
- 9.3.3 The proposed redevelopment would involve the redevelopment of site provide 14 x residential units (5 x 3 bedroom, 4 x 2 bedroom, 5 x 1 bedroom (class C3) with associated amenity space, landscaping, refuse storage, cycle and car parking provision. Flatted developments are prevalent within the immediate vicinity of Cockfosters Road with similar height and massing. The LPA consider the proposed development would be in keeping with the existing the streetscene, which would result in the building not overly prominent and acceptable to the built form with no greater impact on the Green Belt. For the reasons outlined above the proposed development is considered to be consistent with due regard to character and appearance of the immediate area.

### **9.4 Housing Mix**

- 9.4.1 The National Planning Policy Framework requires local planning authorities to deliver a wide choice of high-quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand.
- 9.4.2 The London Plan reinforces this, Policy GG4 states that Londoners should have access to affordable homes, and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New developments are required to offer a range of housing choices in terms of the mix of housing sizes and types. The London Plan sets a clear priority to create communities that are mixed and balanced by way of tenure, fostering social diversity, responsibility and identity (Policy GG4). The London Plan goes on to seek to maximise affordable housing provision to create a balanced and affordable housing sector, with priority to be given to affordable family housing. The need for an appropriate housing mix to address local needs is further reinforced in Enfield policies CP3, CP5 and DMD3.
- 9.4.3 Enfield Policy CP5 of the Core Strategy (2010) seeks to provide the following boroughwide mix for market housing:
- 20% 1 and 2 bed units (1-3 persons);

- 15% 2 bed units (4 persons);
- 45% 3 bed units, (5-6 persons); and,
- 20% 4+ bed units (6+ persons)

9.4.4 Policy DMD3 of the Enfield Development Management Document (2014) states that sites capable of accommodating 10 or more dwellings should meet these dwelling mix targets. However, this is based on the assumption that larger schemes are sited on larger sites and are more capable of accommodating a mix of different house sizes and associated amenity space than smaller and more constrained parcels of land.

9.4.5 In this case, the application site is a constrained parcel of land, and the increase of 5 units over the previously approved (outline) scheme is achieved by extending the approved building footprint to the rear and side.

9.4.6 The proposal would create 14 residential units with a mix of:

- 5 x 3 bedroom (Unit 2, Unit 3, Unit 5, Unit 7, Unit 9) = 35.7%
- 4 x 2 bedroom (Unit 1, Unit 6, Unit 8, Unit 10) = 28.6%
- 5 x 1 bedroom (Unit 4, Unit 11, Unit 12, Unit 13, Unit 14) = 35.7%

9.4.7 In view of the physical constraints of the site and mindful of the tilted balance, the overall mix of units is considered acceptable.

## **9.5 Affordable Housing**

9.5.1 Affordable housing comprises of social rented/affordable rented and intermediate housing provided to eligible households whose needs are not met by the market housing (London Plan Policy H6). Policy DMD1 confirms that development should provide the maximum amount of affordable housing, having regard to the borough-wide affordable housing target of 40%; and with a target tenure mix of 70% social / affordable rent and 30% intermediate, and that this should be subject to scheme viability.

9.5.2 London Plan Policy H4 London Plan states affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances. Policy H6 require that boroughs maximise affordable housing provision, set an overall target in local plans for the amount of affordable housing provision needed over the plan period, and seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. Enfield's Core Strategy Policy CP2 sets a target that 40% of new homes should be affordable on sites over 10 units, subject to scheme viability. Developers are required to provide development appraisals to demonstrate that each scheme maximises affordable housing output.

9.5.3 The proposal for 14 residential units (4 x 1 bed, 5 x 2 bed, 5 x 3 bed) is supported by a Financial Viability Assessment (FVA), carried out on behalf of the applicant. The conclusions of this FVA were that the scheme could not viably support a policy compliant level of affordable housing.

9.5.4 This position has been independently assessed on behalf of the Council by an external consultant who has provided viability advice in relation to the original FVA submitted. The review undertaken raised some questions around comparable average sales values for residential units; breakdown of development costs and the Benchmark Land Value (BLV). It was concluded by the Council's viability consultant,

that with CIL contributions, and a developer profit of 17.5% on Gross Development Value (GDV), the scheme, whilst delivering a surplus, could not viably support the provision of affordable housing units on site, given the exceptional circumstances in this instance as a result of values in this location exceeding the cost of providing on site affordable housing. Nevertheless, the surplus identified could be used to support the delivery of affordable housing off-site.

- 9.5.5 The applicant's consultant accepted the findings of the Council's review of the development costs and has agreed to the in-lieu payment of £498,891 towards the delivery of affordable housing off-site.
- 9.5.6 On balance, the housing contribution is welcomed as this will help make a valuable contribution to the Borough's housing needs. The public benefit of affordable housing contribution must be given appropriate weight when balancing the planning merits of the scheme, and any harmful impacts.

## **9.6 Design**

- 9.6.1 Policy DMD37 encourages achieving a high quality and design led development that should be suitable for its function and appropriate in its context with appropriate regard to its surroundings. Additionally, Policy D3 and D4 of the London Plan specifies the need to respect the character of the surrounding area but also make a positive contribution to the places identity. This policy is re-iterated by CP30 of the Core Strategy which requires new development to be of a high-quality design and in keeping with the surrounding area, as well as the fundamental aims of the NPPF.

### *Siting and layout:*

- 9.6.2 A three-storey high contemporary building is proposed which will be set back some 27m from the edge of Cockfosters Road. Car parking is provided at the front of the site. The new building will respect the established front building line taking into account both Amara Lodge and Kingsdale Court.
- 9.6.3 The proposed layouts of the units are functional with all units benefiting from a central corridor. The building footprint and projection into the site is broadly in keeping with the existing neighbouring patterns of development and deemed appropriate in this location.

### *Scale and Massing:*

- 9.6.4 The existing dwellinghouse is a two-storey building set back from Cockfosters Road. The surrounding context is predominantly three stories, with pitched roofs.
- 9.6.5 The proposed scheme would be over three floors including a lower ground floor and the top floor would be set in from all side with roof pitch away from the neighbouring occupiers. The proposed roof floor terminates at the same height as the neighbouring ridge line of Kingsdale Court, and the overall height comparable with neighbouring Amara Lodge and Kingsdale Court which helps reduce its bulk, scale and massing. Additional set-backs have been undertaken on the top floor and further recessing of proposed dormer windows. It is considered that this respects the scale of buildings in the vicinity of the site.
- 9.6.6 The building would be inset 1.5m from the shared boundaries to the north and south and does project rearwards of neighbouring properties either side. It is acknowledged

that the rear projection of Amara Lodge at ground floor is deeper by some 1.5m along the shared boundary. There is a 8.3m separation distance before the proposed building projects a further 2m outwards. Towards the southern elevation facing Kingsdale Court, the rear ground floor projection is 3.5m deeper along the shared boundary, than the rear building line of this occupier. There is a 6.2m separation distance before the outward projection extends some 4.9m.

- 9.6.7 The building footprint at ground floor level would not exceed a line taken from the mid-point of the nearest residential windows at an angle of 45 degrees or 30 degrees at first floor. This test, is borrowed from policy DMD11 and used to limit the impact of rearward extensions upon nearby residential properties. As a consequence the proposal would not be harmful in terms of loss of light or outlook for existing neighbouring residential occupiers.
- 9.6.8 In view of the site's location, the existing surrounding building heights and the detached nature of the building the site is considered appropriate for accommodating a building of the height and scale proposed.

*Materials:*

- 9.6.9 A simple and well considered palette of materials is proposed so that this building sits comfortably in its setting. That is achieved through a predominant use of (red) brick which reflects the local vernacular. The top floor, which has roof pitches away from the neighboring occupiers, is to be treated in a different material in order to appear subservient to the rest of the building. Details of materials for the dormer windows appear as zinc cladding, and this will be subject to condition. To help this appear subordinate to the building below, articulation of the building is achieved through the inclusion of recessed and projecting elements, external balconies, glass balustrades and window reveals.
- 9.6.10 Officers recognise the need to utilise sites to their optimum and this scheme does so whilst providing an attractive setting for future occupiers. Officers are supportive of the proposed design; the use of materials and articulation is well considered, and would result in a high-quality and sustainable development, subject to conditions to ensure the quality and detailing would be delivered.

**9.7 Quality of Accommodation**

- 9.7.1 All residential units meet or exceed the minimum space standards in terms of Gross Internal Area and bedroom sizes as set out in the London Plan, and the more recent nationally described space standards. This complies with London Plan policy, National Described Space standards and Enfield planning policies.
- 9.7.2 Twelve of the 14 units comply with the built in space storage requirement. It is recognised U7 and U8 have a marginal shortfall of built in storage. However, their overall GIA compensates for this slight shortfall of storage space.
- 9.7.3 London Plan policy D5 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. The proposal will provide a minimum of 10% wheelchair accessible or adaptable units, whilst the remaining 90% of units will meet accessible and adaptable standards set out in Part M4(3) 'wheelchair user dwellings', and part M4(2) 'accessible and adaptable dwellings'. This provision will be secured by condition.

- 9.7.4 The layout and arrangement of units has allowed for the majority of units to be dual aspect units, ensuring good cross ventilation, daylight, sunlight and internal standards of accommodation.
- 9.7.5 In accordance with the Mayor's Housing SPG (2016) it has been confirmed that a minimum ceiling height of 2.5 metres for at least 75% of the gross internal area of the residential units can be achieved for all units.

*Window Distancing:*

- 9.7.6 Policy DMD10 sets out the minimum separation distances required between rear facing windows. The rearward facing windows within the development will be some 14m off the boundary and over 25 metres for rear facing windows as per DMD10. A sunlight and daylight report has been submitted which concludes acceptable sunlight levels would remain for neighbouring occupiers. The proposed side facing windows on the southern elevation towards Kingsdale Court are high level windows, and the proposed two flank dormers towards this neighbouring occupier would be inset some 8.2m from the neighbouring flank walls, which do not contain flank dormers and as such not directly overlook this occupier at roof level. The side facing windows on the northern elevation are high level secondary windows and do not face directly onto habitable rooms of neighbouring buildings. A 1.8m timber fence is proposed to further mitigate privacy at ground floor level. As such these do not give rise to loss of privacy or overlooking concerns.

*Residential Amenity Space:*

- 9.7.7 Policy DMD9 is of most relevance to amenity space, stating that all new development must provide good quality private amenity space that is not significantly overlooked by surrounding development, and that meets or exceeds the standards listed in the policy. In addition to the internal space proposed there is also a sufficient level of on-site communal and private amenity space. Each unit is afforded access to a private terraces or balconies ranging in size between 5sqm and 20sqm. All balconies/terraces are sized to comply with the Mayor's Housing SPG. On balance the quantum, quality and combination of private and communal amenity space would be sufficient to meet the likely demands of future residents.
- 9.7.8 Considered against the policy compliant standard of accommodation and the tilted balance, 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 DMD8, DMD9, and DMD37.

**9.8 Residential Amenity**

- 9.8.1 Policy DMD 8 states that new developments should preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance. The submission contains a daylight and sunlight analysis and the LPA acknowledge all units (1-14) comply with the ADF and BREEM guidelines. In addition, adequate provision of sunlight and daylight will reach neighbouring habitable rooms.
- 9.8.2 Submitted plans illustrate window placement and confirmation of secondary window placements for the upper floor units on both north and south elevations. This along with the proposed 1.8m high timber fence at ground level mitigates any adverse overlooking or loss of privacy to the neighbouring occupiers of Kingsdale Court and Amara Lodge and to the future occupiers of the proposed units. No sense of

enclosure or outlook concerns are anticipated.

## **9.9 Transportation**

- 9.9.1 Under the London Plan (2021) Policy T6, the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

*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.*

- 9.9.2 Policy DMD47 outlines that all development should make provision for attractive, safe, clearly defined and convenient routes and accesses for pedestrians, including those with disabilities. It states new accesses (intensification of existing access is still considered subject to a similar assessment), will only be permitted where appropriate, safe and functional provision is made for refuse collection and any other service and delivery vehicles, emergency service vehicles and operational needs for existing residents.

- 9.9.3 The vehicular access will be from Cockfosters Road, as existing. The proposal provides a segregated vehicular access and pedestrian access which is considered acceptable.

- 9.9.4 14 vehicle parking spaces are proposed and this is considered an acceptable provision given the low PTAL. It is noted that 3xspaces have active charging points and 9xspaces have passive charging points. This meets the LP requirement of 20% active and remainder passive. A segregated pedestrian path is proposed through the site from a separate pedestrian access from Cockfosters Road. Proposed refuse is located close to the footway and meets Manual for Streets guidance for distance to move the refuse stores. A total of 26 cycle parking spaces have been provided. The location of the cycle store for the proposed 14 units are integrated within the site and the location is considered acceptable as it will not require bicycles being transferred internally.

- 9.9.5 The proposed development including the provision of gates (1.1m in height) makes appropriate provision for access having due regard to DMD Policies 8, 45 and 46 and The London Plan Policy T6.

## **9.10 Trees, Biodiversity and Landscaping**

- 9.10.1 Policy DMD 80 stipulates that *all development including subsidiary or enabling works that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value, will be refused. Where there are exceptional circumstances to support the removal of such trees, adequate replacement must be provided. All development and demolition must comply with established good practice, guidelines and legislation for the retention and protection of trees. Proposals must:*

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

9.10.2 London Plan Policy G7 states

Development proposals should ensure that, wherever possible, existing trees of value are retained. Should planning permission be granted for the removal of trees adequate replacement provision should be made. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

9.10.3 Submitted plans and documents include an Arboricultural report which outlines tree coverage across the site. There are thirty-eight (38) trees and eight (8) groups of trees which have been categorised within or immediately adjacent the site; 14 are category B trees and 32 are category C trees. 6 Trees and 2 groups of trees which fall within category C are to be removed (G1, G2,T6, T11,T12, T13,T18 & T19). Given the 6 trees to be removed on site are low value trees, the Council's Tree Officer acknowledges the replacement of such trees would be acceptable and such measures are secured by means of a planning condition. All retained trees will be protected during development by using fencing and/or ground protection measures and a condition is recommended to secure this.

9.10.4 Submitted documentation includes an Ecology Report which confirms no protected species or evidence of protected species were found on site at the time of the survey. The site provides negligible potential for badger, Great Crested Newts and reptiles due to the lack of suitable habitat and limited connectivity to more suitable habitats. The building (B1) provides low potential for roosting bats due to a small number of gaps found between roof tiles along a rear verge and soffit boarding. The shed building (B2) provides negligible potential for roosting bats due to the lack of roosting features. Further bat surveys will be required prior to the commencement of development within the May to August window and a condition is recommended to secure this.

9.10.5 The report recommends the provision of 2 bat boxes to be provided on trees, insect boxes to be provided which include 2 robin boxes, 2 songbird boxes, 2 urban bee nesting boxes and 2 bug biome boxes shall be provided.

9.10.6 There are no objections to the removal of the trees proposed and a scheme of tree protection for the remaining trees has been agreed and will be secured by condition. A condition is recommended to secure the identified ecological enhancements. in line with Policy DMD79, DMD80 and DMD81 the works to the building where the tree protection measures in the Arboricultural report HWA10467\_APIII 2.0 and associated tree protection plans are followed as per DMD 80 and Policy G7 of the London Plan (2021).

## **9.11 Energy and Sustainability**

9.11.1 London Plan Policy SI 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:

1. Be Lean: use less energy;
2. Be Clean: supply energy efficiency; and
3. Be Green: use renewable energy.

9.11.2 Enfield's 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).

9.11.3 A detailed Energy and Sustainability Statement supports the application, this seeks to demonstrate how the proposed scheme complies with the above aspects of both the London Plan and the Development Plan. The proposed energy strategy seeks to reduce energy demand, and CO2 emissions through the following:

- Energy efficiency measures
- Efficient heating systems
- Low air permeability
- Heat recovery system
- Energy efficient lighting
- Renewable technologies (solar PV panels)

9.11.5 The energy strategy, based on the London Plan principals of Be Lean, Be Clean and Be Green, combined with highly efficient boilers and PV panels results in a 25.9% reduction in carbon dioxide emissions. The proposal broadly complies with the energy and sustainability requirements, subject to planning conditions that will agree the final measures needed to achieve the necessary savings.

## **9.12 Noise / Construction Dust**

9.12.1 London Plan Policy D14 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. The residential use in itself would not give rise to unacceptable levels of noise. Noise and dust arising from the construction process can be managed through planning condition

9.12.2 Environmental Health officers consider the development's location on a busy road has potential for construction dust to be harmful to prospective resident's amenity. To address this a condition would be attached.

### *Contaminated Land*

9.12.3 The requirement to deal with contaminated land is set out in London Plan and is reinforced by the NPPF. It is considered that there is potential for the site to include some contaminated ground. To address this, and ensure the site is suitable for end users pre-commencement conditions are recommended

### *Air Quality*



9.12.4 The proposal would introduce additional residential units to an area already comprising residential accommodation. In this respect the proposal is considered acceptable. Enfield policies CP32 and DMD64 seek to resist developments that would adversely impact on air quality, unless suitable mitigation measures can be achieved.

9.12.5 Environmental Health does not raise any concerns that the proposal would have a negative impact on existing air quality, subject to pre-commencement conditions being attached including the requirement for a Construction Management Plan, this must set out measures to mitigate against dust and emissions impacts and must be in accordance with the Mayor's SPG 'The Control of Dust and Emissions During Construction and Demolition'.

### **9.13 Sustainable Drainage / Flood Risk**

9.13.1 Policy DMD59 states that new development must avoid and reduce the risk of flooding, and not increase the risk elsewhere. DMD policy 61 states that all developments must maximise the use of and, where possible, retrofit Sustainable Drainage Systems (SuDS). Any proposed SuDS measures should be appropriate for the site conditions, seek to achieve greenfield runoff rates as well as maximise the use of SuDS.

9.13.2 A Flood Risk Assessment (FRA) supports the application. This confirms the site as being within Flood Zone 1, meaning it is at the lowest risk of a flood event from fluvial or tidal flooding. It is classified as having a less than 1 in 1000 annual probability of flooding.

9.13.3 An objection is raised by SUDS Officers to the it is considered that the drainage strategy accompanying the application does not meet the requirements of DMD Policy 61. According to DMD Policy, developments must achieve as close to Greenfield runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) year events and maximise the use of SuDS in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management Train. This means that source control SuDS measures such as green roofs, rain gardens and permeable paving must be used extensively across the site.

### **9.14 Section 106 Contributions**

9.14.1 Regulation 122(2)(a) of the Community Infrastructure Levy Regulations 2010 (as amended) (CIL Regulations) requires that any planning obligations must be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Having regard to this, and the content above it is recommended that should planning permission be granted, the following obligations / contributions should be secured through a Section 106 legal agreement:

- Affordable Housing contribution of £498,891 as a payment in lieu.
- Sustainable Transport contribution of £11,042;
- 5% monitoring fee for the financial contributions and £350 for monitoring any non financial obligations.
- Carbon offset contribution
- Employment and skills provisions – construction phase

### **9.15 Community Infrastructure Levy**

- 9.15.1 The site is located within the higher CIL charging zone of £120 per sqm as per the Councils adopted CIL charging schedule as of April 2016. The development would be CIL liable. Council/Mayoral CILs equates £250,000.

## **10 Public Sector Equalities Duty**

- 10.1 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.

## **11 Conclusion**

- 11.1 The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF, states that planning permission should be granted unless “the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; 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”.
- 11.2 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.
- 11.3 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 the delivery of an affordable housing contribution carry significant weight in favour of the proposed development.
- 11.4 The proposed development would deliver the following wider planning benefits:
- Development, which makes effective and efficient use of land, optimises the housing potential, helping to meet the Borough’s housing needs;
  - A high-quality residential environment for all future occupiers.
  - High standards of urban design and architecture; and
  - Sustainable design which will result in low levels of carbon emissions
- 11.5 Officers consider that on balance the scheme would make a positive contribution to the locality. It would deliver much needed additional homes and deliver a contribution to much needed affordable housing. The development would be in general compliance with Council policy and there are no material considerations of sufficient weight that would suggest that the application should be refused. Officers are therefore recommending approval of the scheme in accordance with the presumption in favour of sustainable development as set out by the National Planning Policy Framework (NPPF).

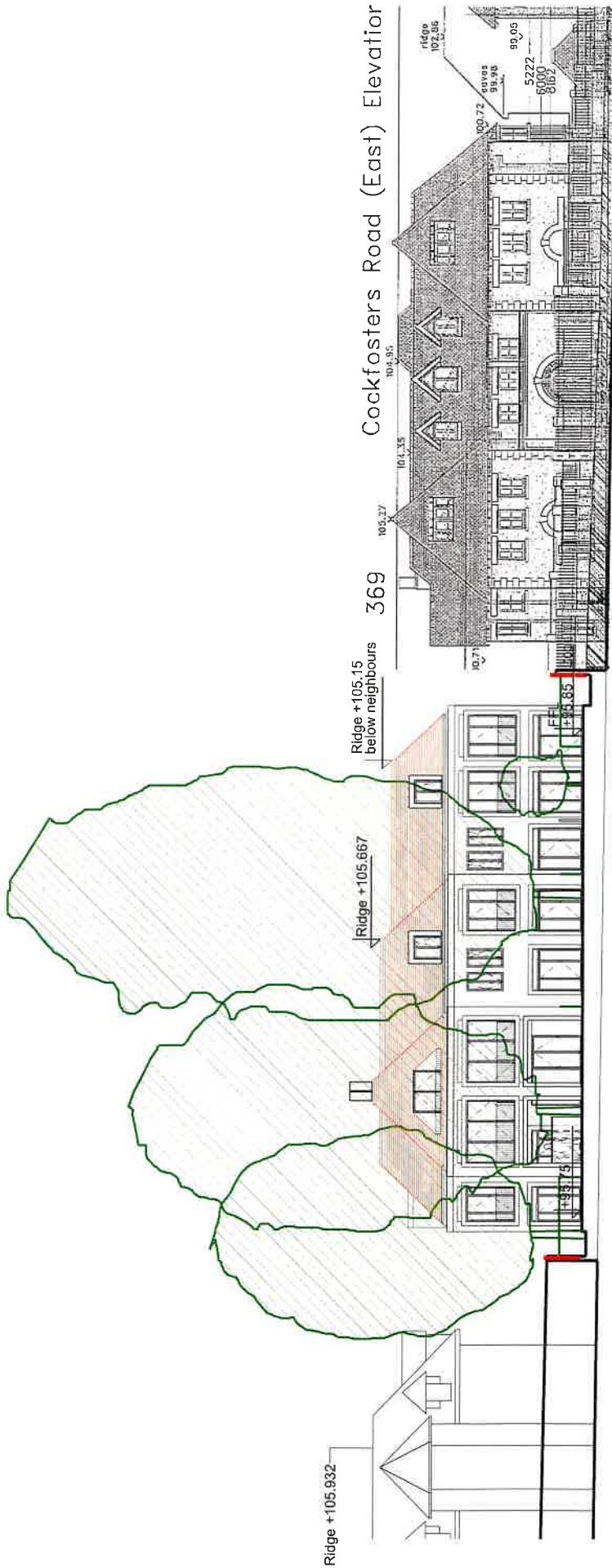


Neighbouring Development  
Kingsdale Court 90

Neighbouring Development  
Amara Lodge

368 COCKFOSTERS ROAD, HADLEY WOOD  
Existing and Proposed Cross Sections  
Rear Elevation

G M L Architects  
UNIT 3, 1-4 Christina Street, London, EC2A 4PA  
Tel: 020 7729 9585 Fax: 020 7729 1801 info@gmlarchitects.co.uk  
SCALE: 1:2000/AJ  
ISSUED FOR: PLANNING  
FIRST ISSUED: JAN / 2021  
CHECK BY: WH DRAWN BY: PC  
4828/PA25



Cockfosters Road (East) Elevation

369

Ridge +105.15  
below neighbours

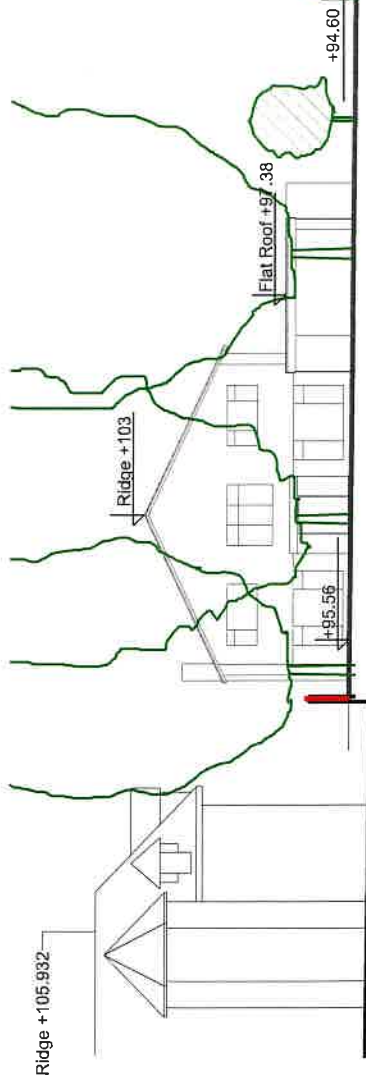
Ridge +105.667

Ridge +105.932

Neighbouring Development  
Kingsdale Court

Proposed Elevation

Neighbouring Development  
Amara Lodge



Cockfosters Road (East) Elevations

369

Ridge +103

Flat Roof +97.38

Ridge +105.932

Neighbouring Development  
Kingsdale Court

Existing Front Elevation

Neighbouring Development  
Amara Lodge



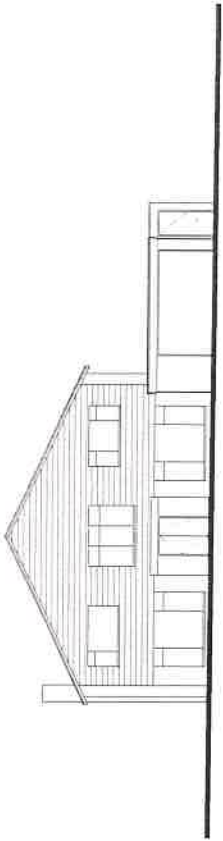
368 COCKFOSTERS ROAD, HADLEY WOOD

Existing and Proposed Cross Sections  
Cockfosters Road

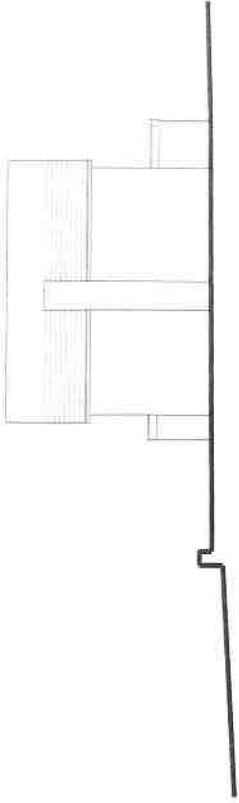
G M L Architects

UNIT 3, 4 Chelmsford Street, London, EC2A 4PA.  
Tel: 020 7729 8595 Fax: 020 7729 1801 info@gmlearchitects.co.uk  
SCALE: 1:2000  
ISSUED FOR: PLANNING  
FIRST ISSUED: JAN/2021  
CHECKED BY: WH DRAWN BY: PC

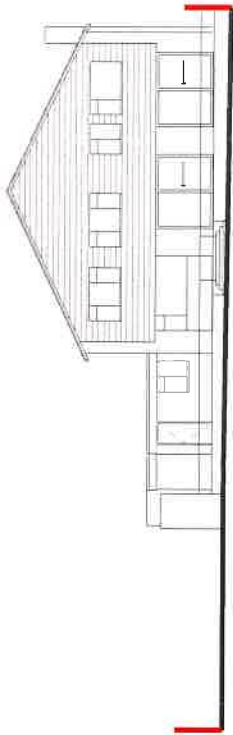
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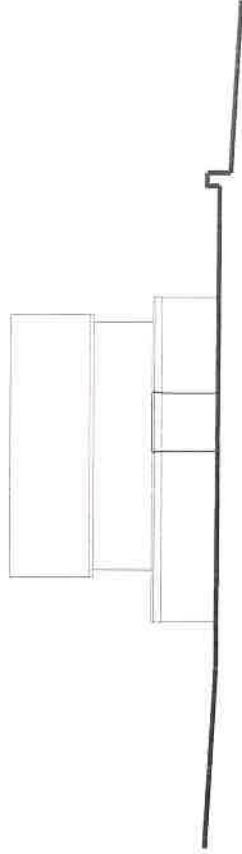
Existing East (Front) Elevation



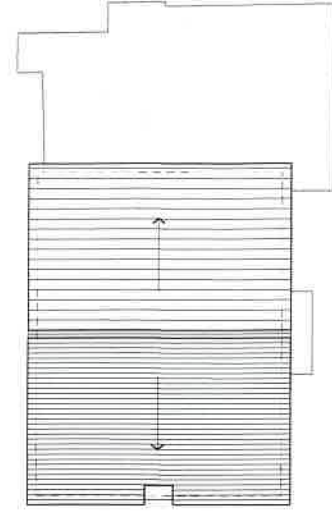
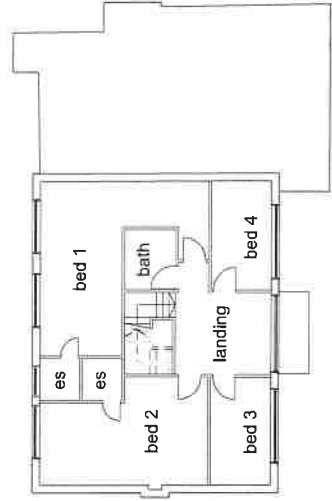
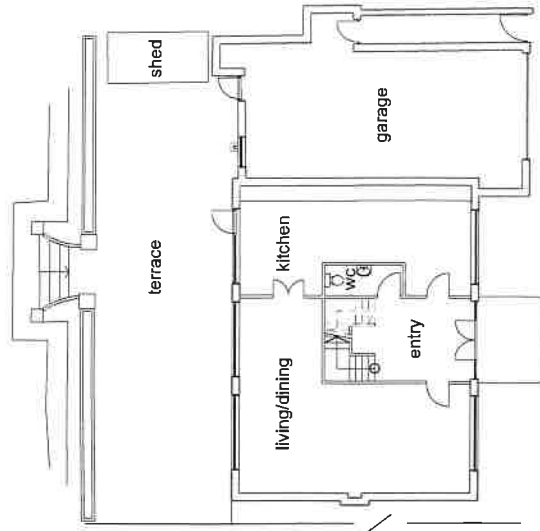
Existing South Elevation



Existing West (Rear) Elevation



Existing North Elevation



Rev A 21.07.2021 Existing plans added at LPA request

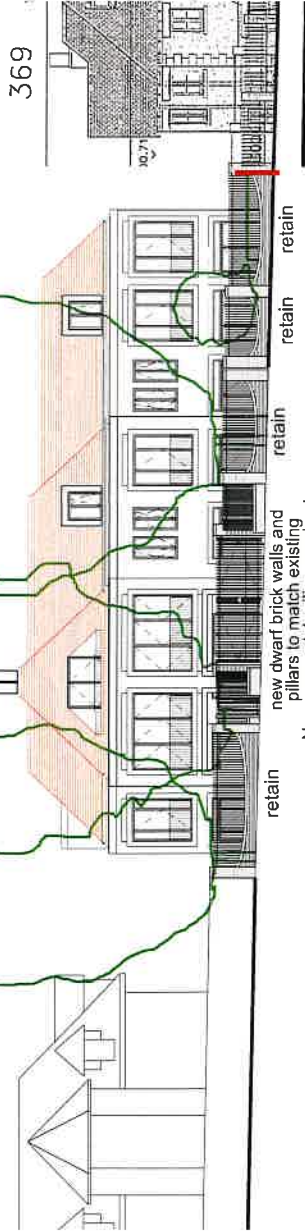
368 COCKFOSTERS ROAD, HADLEY WOOD  
EXISTING HOUSE  
PLANS AND ELEVATIONS

G M L Architects

UNIT 3-1-4, Chelsea Street, London, EC2A 4PA  
1st Fl: 020 7728 5595 Fax: 020 7729 1801 info@gmllarchitects.co.uk  
SCALE: 1:200  
ISSUED FOR: PLANNING  
FIRST ISSUED: JAN/2021  
DRAWN BY: PC CHECKED BY: PC  
4828/PA05A



Existing boundary wall to be retained where possible and replicated where required



Neighbouring Development Kingsdale Court

Street Elevation

Neighbouring Development Amara Lodge



Rear Elevation - PPC Metal Pallisade Fence Refer to landscape scheme for details of planting



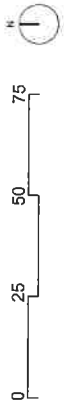
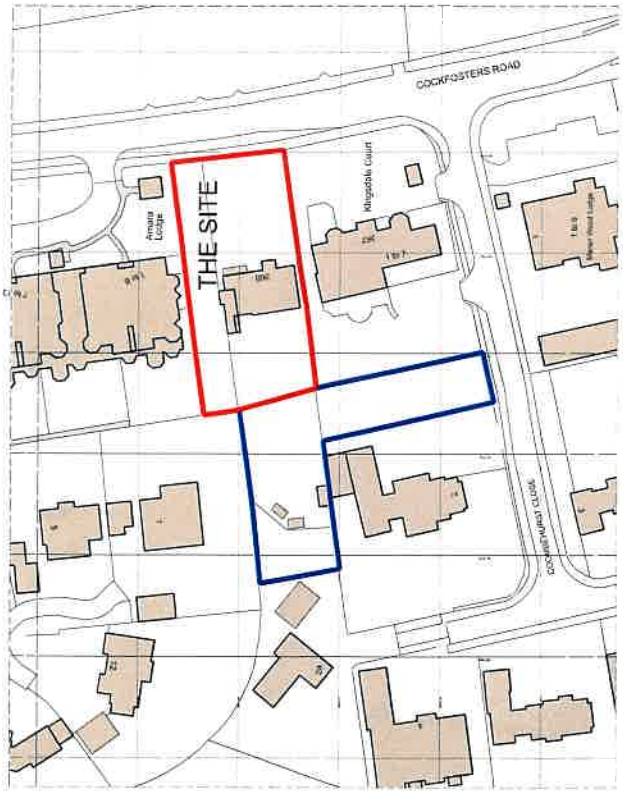
vertical bar fencing

368 COCKFOSTERS ROAD, HADLEY WOOD  
Front and Rear Boundary Elevations

G M L Architects

UNIT 3,1-4 Christina Street, London, EC2A 4PA  
Tel: 020 7729 9595 Fax: 020 7729 1801 info@umlarchitects.co.uk  
SCALE: 1:200/0A3  
ISSUED FOR: PLANNING  
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CHECK BY: WH DRAWN BY: HC

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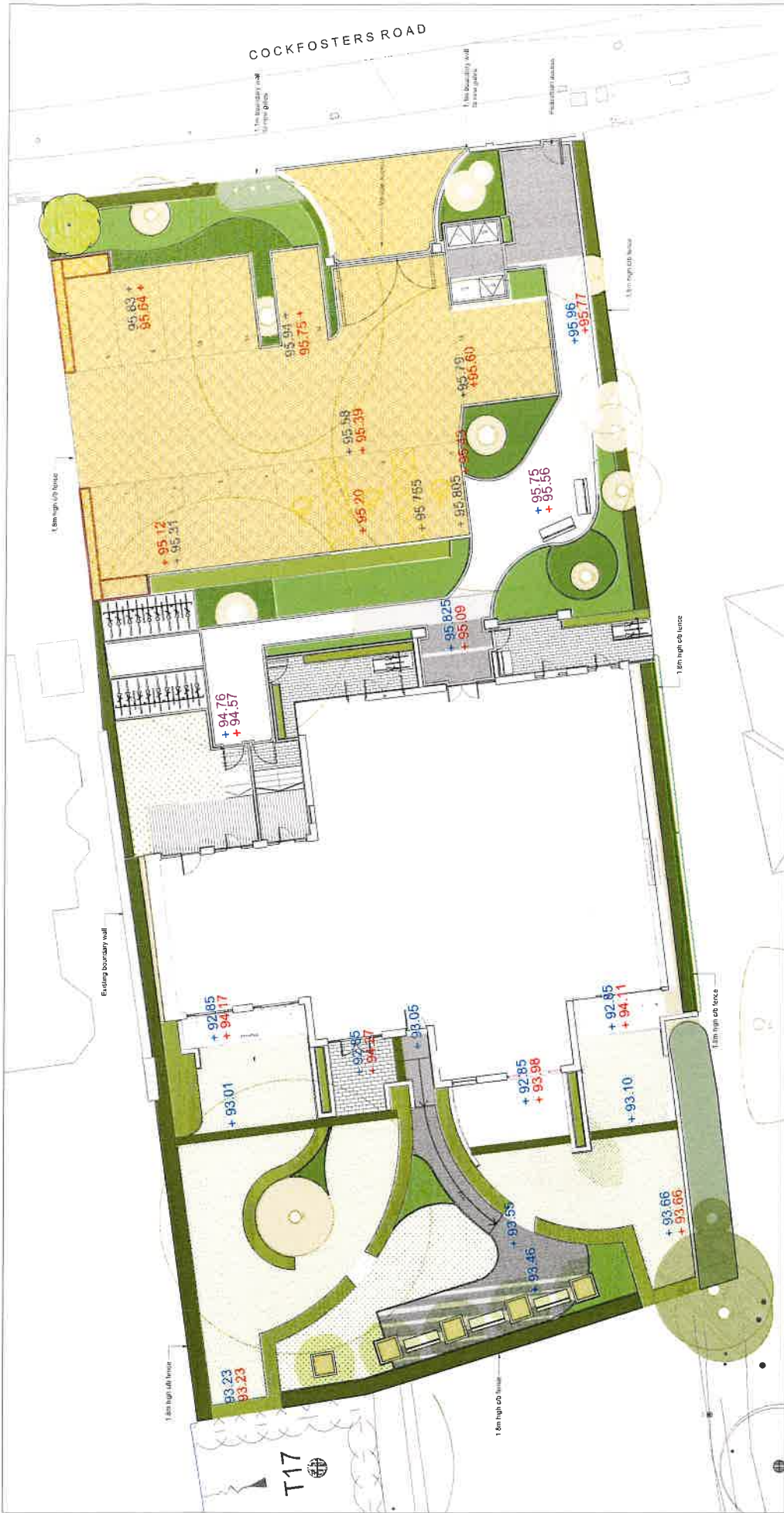
368 COCKFOSTERS ROAD, HADLEY WOOD  
 SITE LOCATION PLAN

G M L Architects

UNIT 3, 1-4 Chippinghina Street, London, EC2A 4PA  
 Tel: 020 7729 9595 Fax: 020 7729 1801 info@gmlarchitects.co.uk  
 SCALE: 1:25000A3  
 ISSUED FOR: PLANNING  
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 DRAWN BY: PC CHECK BY: PC

4828/PA06

Scale	1:100
Date	10/11/2013
Client	...
Project	...
Sheet	...



**Key**

- Existing trees to remain - see tree constraints & tree protection plan
- Existing hedging to remain
- New Native Species Tree

**Ornamental Shrubs & Perennials**

- Native Hedge. Species mix to be as follows:
  - 40% Hawthorn (*Crataegus monogyna*)
  - 30% Hazel (*Corylus avellana*)
  - 10% Blackthorn (*Prunus spinosa*)
  - 10% Field Maple (*Acer campestre*)
  - 10% Holly (*Ilex aquifolium*)
- All Borders to be spread with bark mulch
- 5-35mm Ornamental Chipped Bark
- Fire-resistant, in accordance with BS 4790:1987 or similar
- Grass Areas. Turf to BS 3969: 1998
- +A1:2013 Recommendations for Turf for general purposes
- Typical sown seed mixture for turf:
  - Slender Perennial Ryegrass 25%
  - Slender Creeping Red Fescue 20%
  - Strong Creeping Red Fescue 45%

**Key**

- Permeable Driveway Blockwork Paving - see architects drawing for details
- Permeable Pedestrian Area Paving - see architects drawing for details
- Terrace Paving - see architects drawing for details
- Decking - see structural engineers details

**Key**

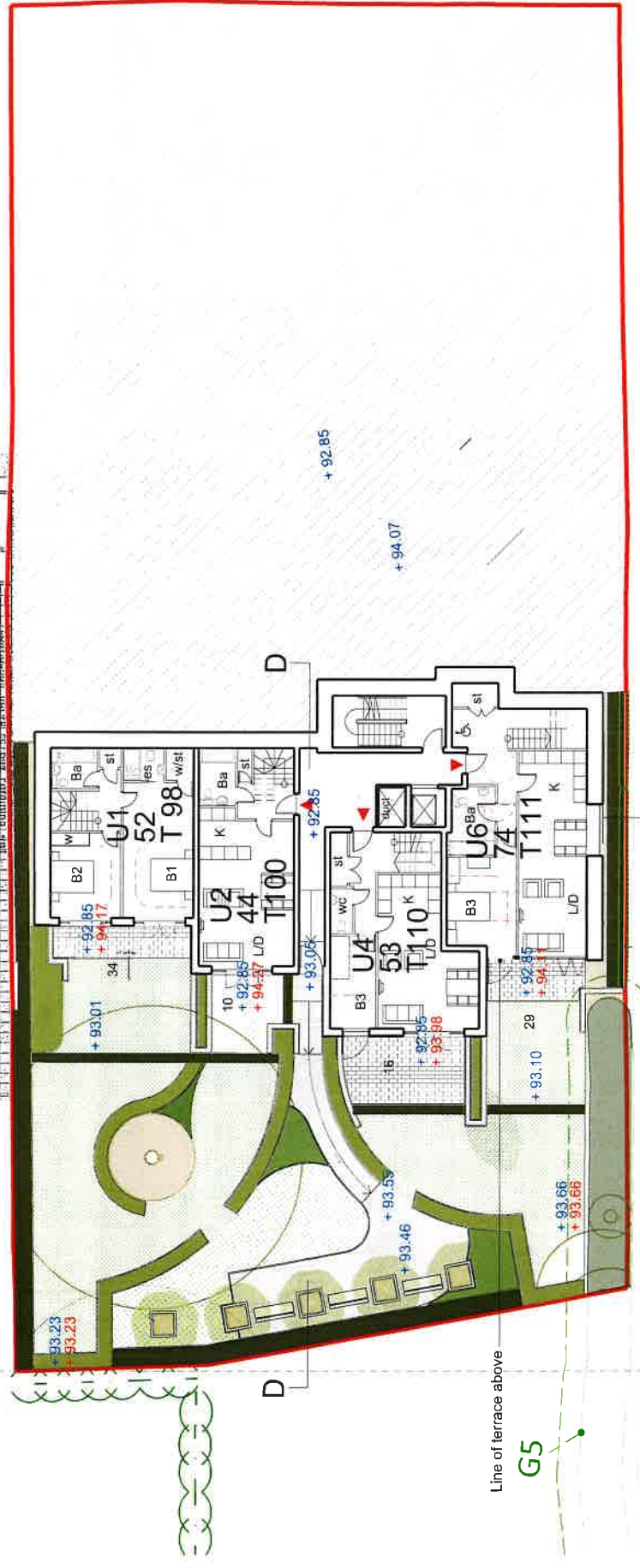
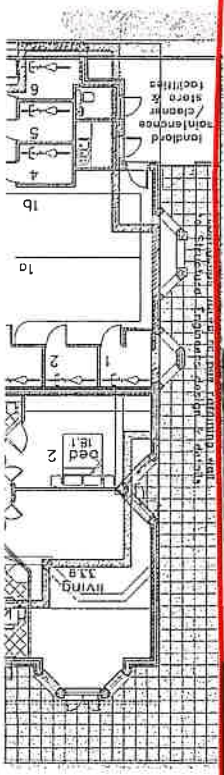
- Rear Garden Retaining walls - see structural engineers details
- Cycle stores to architects detail
- Benches to architects detail
- Refuse bins

N

0m 2.5 5 7.5 10

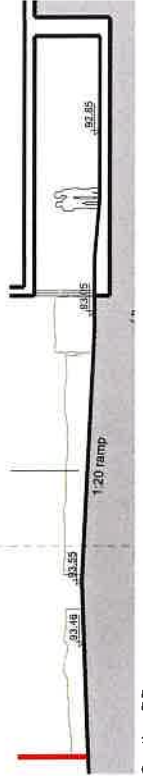


Neighbouring Development  
Amara Lodge



high level window

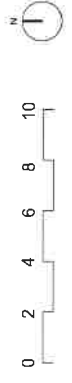
Neighbouring Development  
Kingsdale Court



Section DD

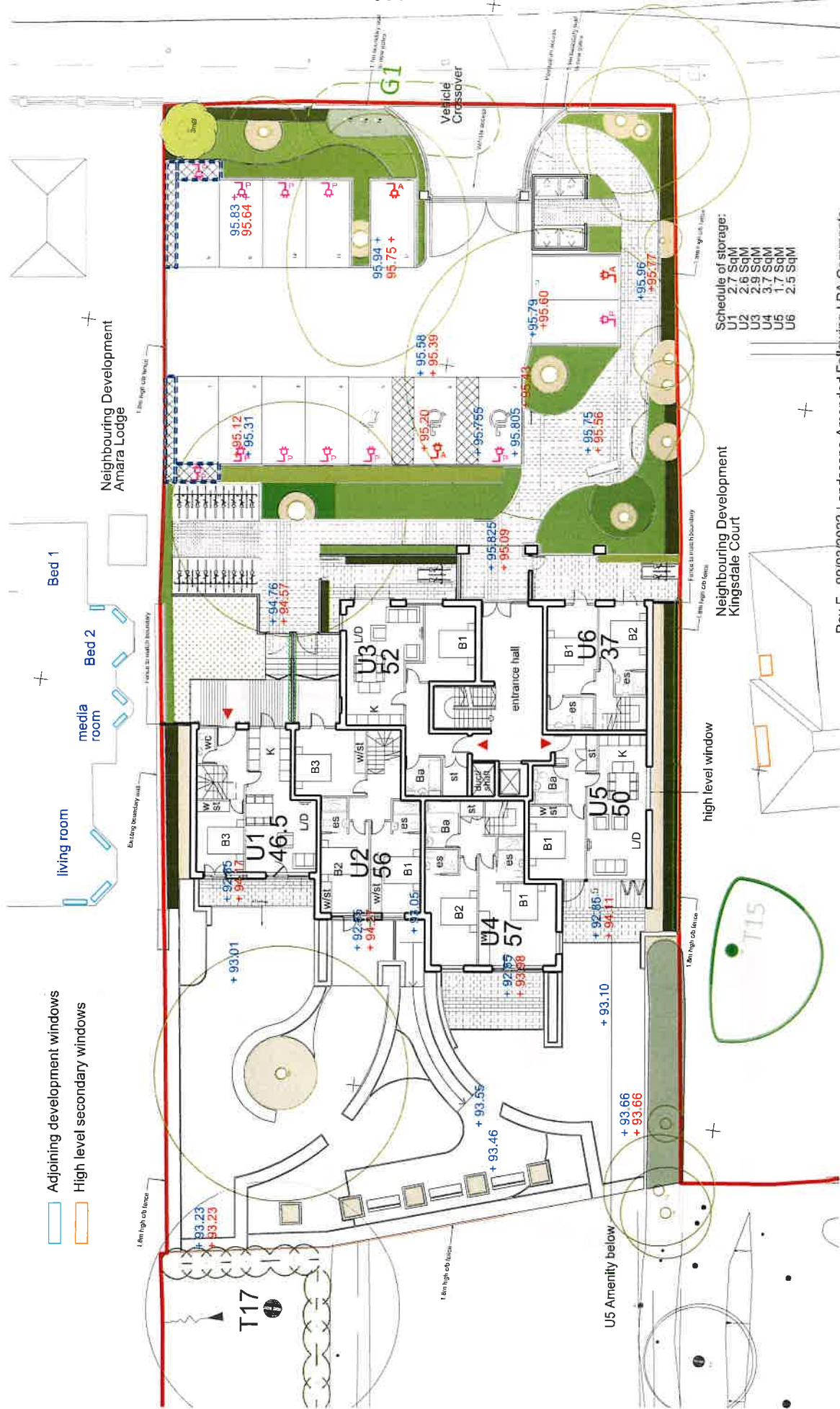
Rev D - 08/11/2021 Amended Plan as Design Officer comments

368 COCKFOSTERS ROAD  
LOWER GROUND FLOOR PLAN



G M L Architects  
UNIT 3-4, Christina Street, London, EC2A 4PA  
Tel: 020 7729 9595 Fax: 020 7729 1811 info@gmllarchitects.co.uk  
SCALE: 1:200/3/4  
DESIGNED FOR: PA  
FIRST ISSUE: Jan 2021  
DRAWN BY: WH CHECKED BY: HC 4828/PA10D

COCKFOSTERS ROAD



- Adjoining development windows
- High level secondary windows

Schedule of storage:

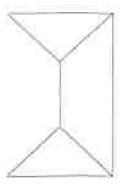
U1	2.7 SqM
U2	2.6 SqM
U3	2.9 SqM
U4	3.7 SqM
U5	1.7 SqM
U6	2.5 SqM

Rev F - 09/03/2022 Landscape Amended Following LPA Comments  
 Rev E - 08/11/2021 Amended Plan as Design Officer comments

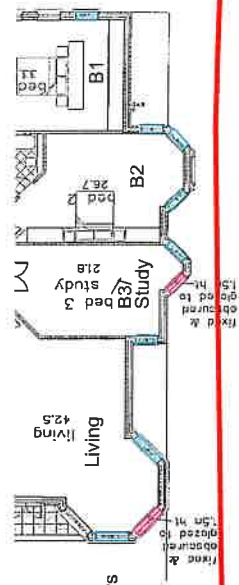


368 COCKFOSTERS ROAD  
 GROUND FLOOR PLAN

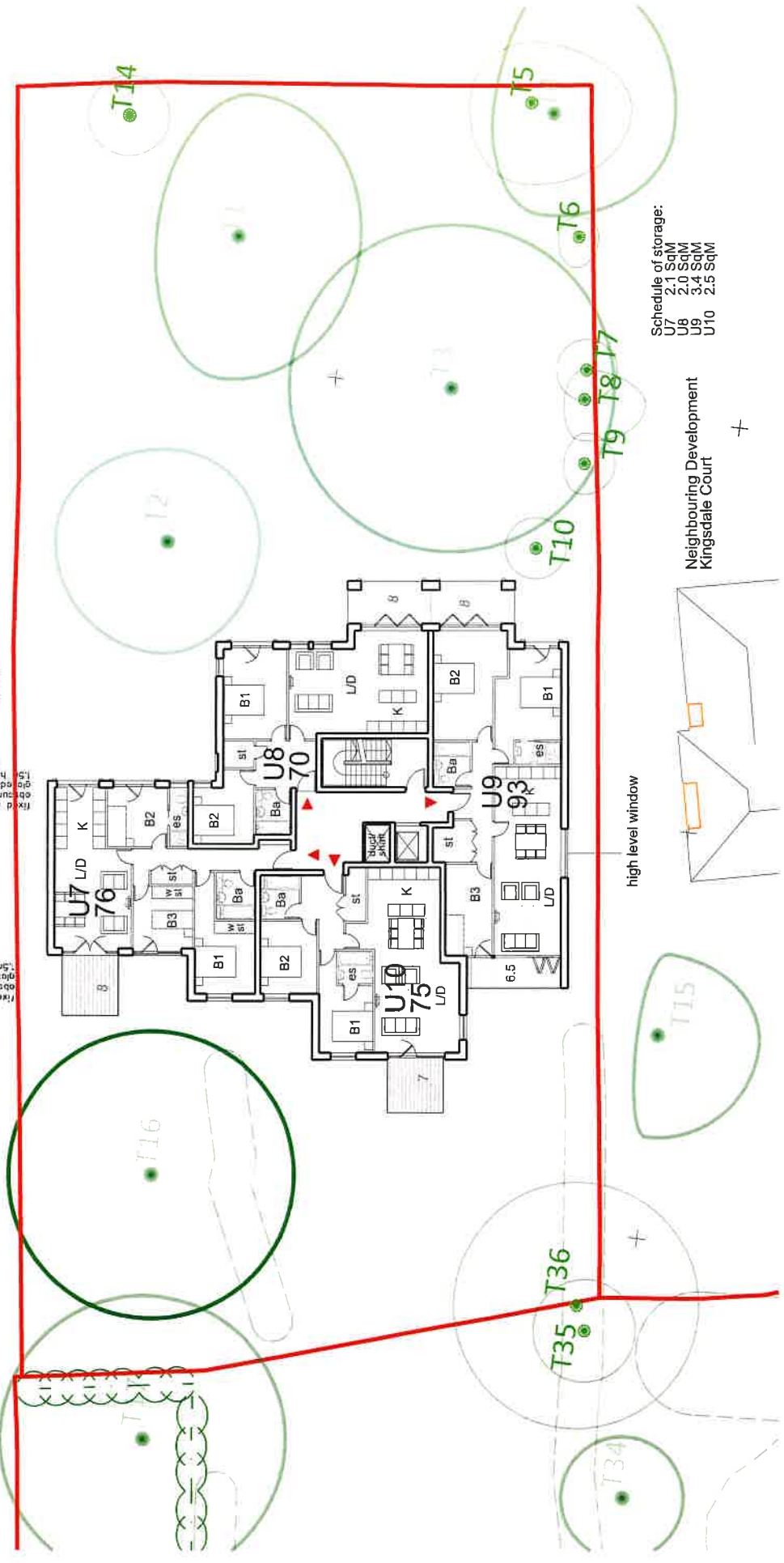
G M L Architects  
 UNIT 3 1-4 Christina Street London EC2A 4PA  
 Tel: 020 7729 9595 Fax: 020 7729 1801 info@gmlearchitects.co.uk  
 SCALE  
 ISSUED FOR: PA  
 DATE: Jan 2021  
 DRAWN BY: WH CHECKED BY: HC  
 4828/PA11F



Neighbouring Development  
Amara Lodge



- Adjoining development windows
- Adjoining development obscured windows
- High level secondary window

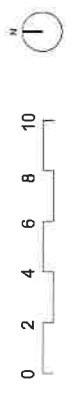


Schedule of storage:

U7	2.1 SqM
U8	2.0 SqM
U9	3.4 SqM
U10	2.5 SqM

Neighbouring Development  
Kingsdale Court

Rev C - 08/1/2021 Amended Plan as Design Officer comments

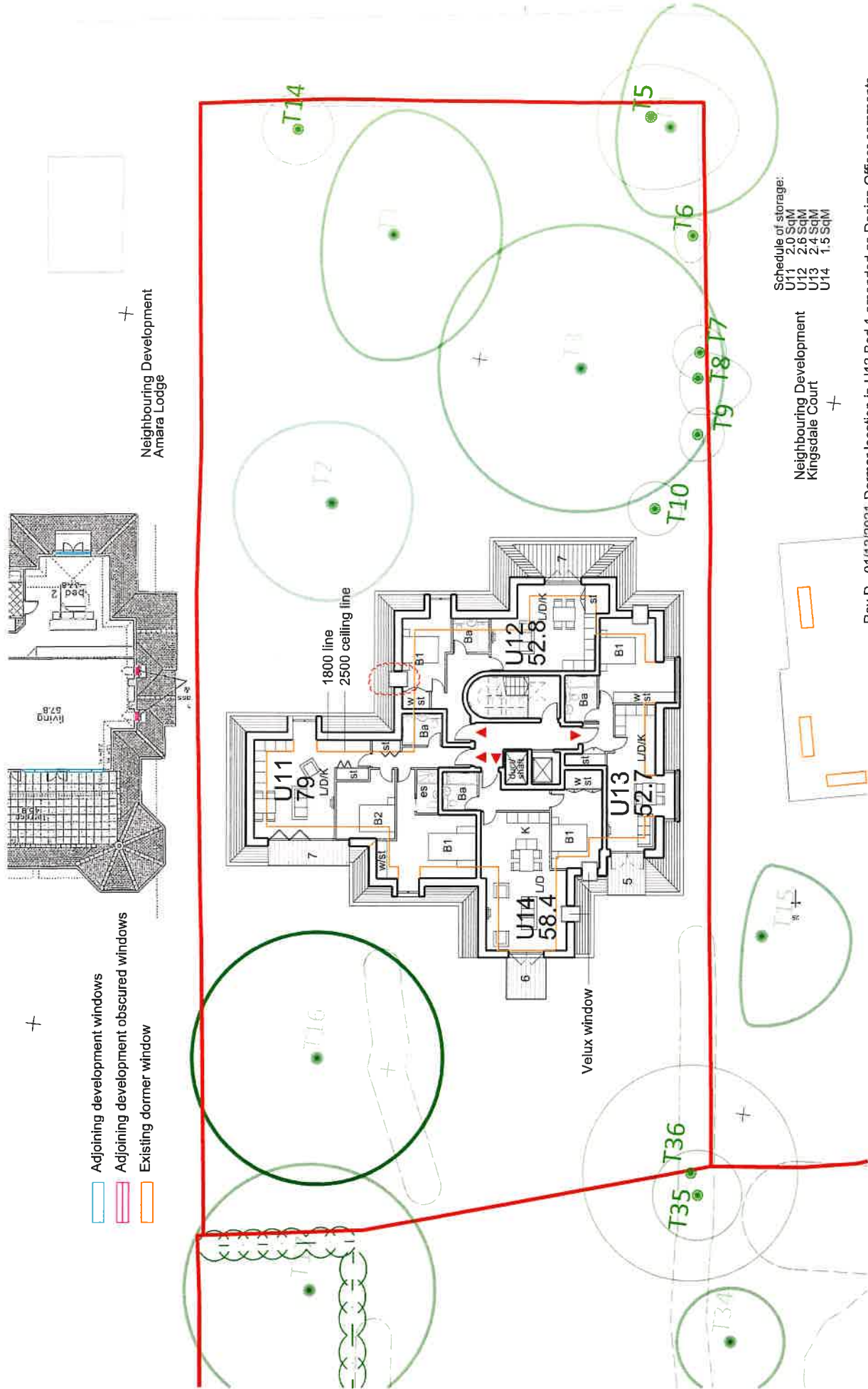


368 COCKFOSTERS ROAD, HADLEY WOOD  
FIRST FLOOR PLAN

G M L Architects  
UNIT 3-14, Christiea Street, London, EC2A 4PA  
Tel: 020 7729 5595 Fax: 020 7729 1801 info@gmlearchitects.co.uk

SCALE: 1:200 @ A3  
ISSUED FOR: PLANNING  
FIRST ISSUED: JAN/2021  
DRAWN BY: WH CHECK BY: PC

4828/PA12C

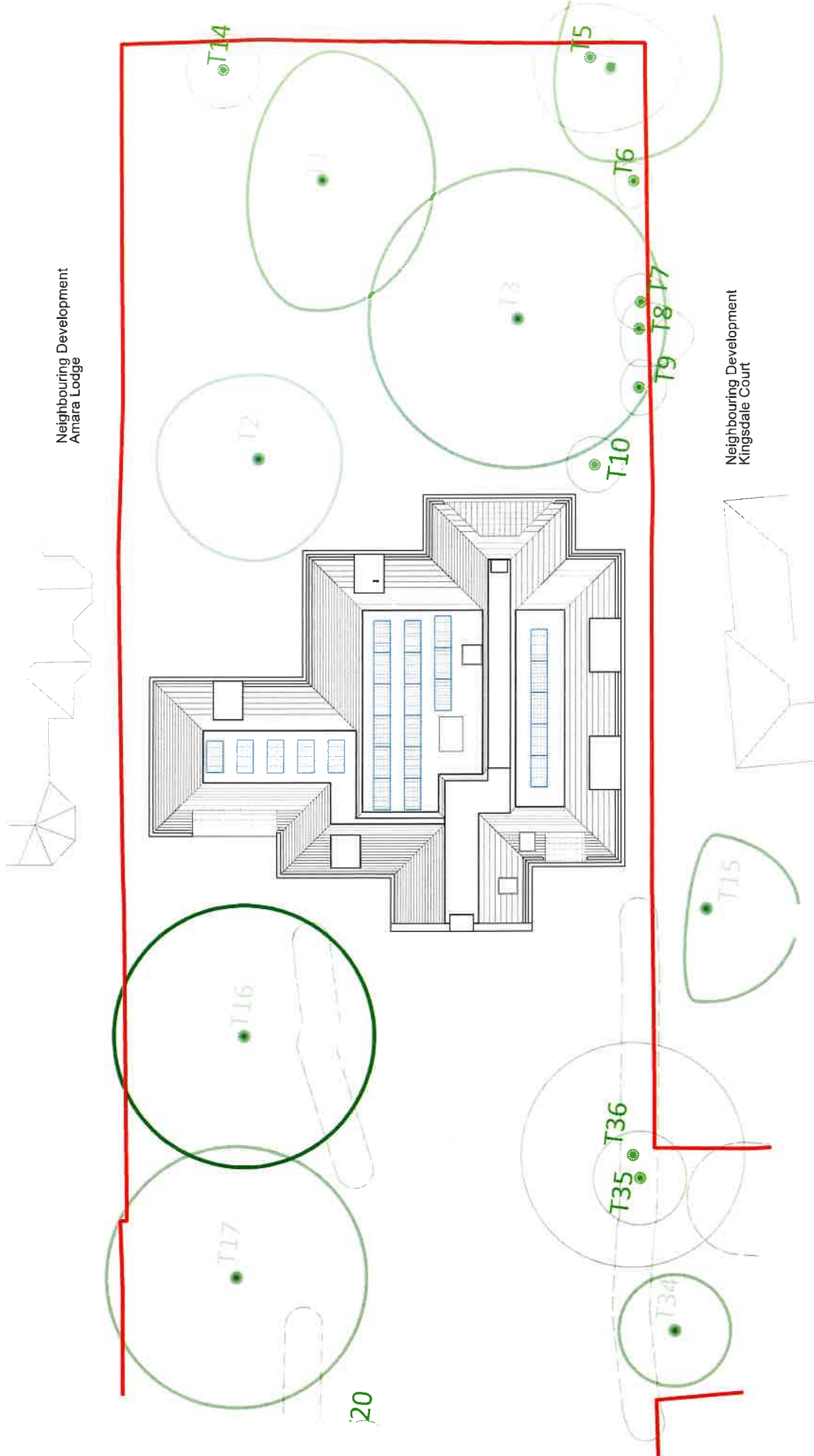


Rev D - 01/12/2021 Dormer location in U12 Bed 1 amended as Design Officer comments  
 Rev C - 08/11/2021 Amended Plan as Design Officer comments



Neighbouring Development  
Amara Lodge

Neighbouring Development  
Kingsdale Court



Rev A - 08/11/2021 Amended Following Design Officer comments

368 COCKFOSTERS ROAD, HADLEY WOOD  
ROOF PLAN



G M L Architects

UNIT 3, 1-4 Christina Street, London, EC2A 4PA  
 Tel: 020 7729 9595 Fax: 020 7729 1801 info@gmllarchitects.co.uk  
 SCALE: 1:2000(A3)  
 ISSUED FOR: PLANNING  
 FIRST ISSUED: JAN 2021  
 DRAWN BY: WH CHECK BY: PC

4828/PA14A



369 Cockfosters Road (East) Elevator

Neighbouring Development Amara Lodge

Neighbouring Development Kingsdale Court

Street Elevation

- Stone Chimney
- Clay Tile Roof with Bonnet Hips
- Zinc Dormer
- Concealed/Secret Gutter
- Stone Surround
- Aluminium Windows
- Brickwork

Dormer

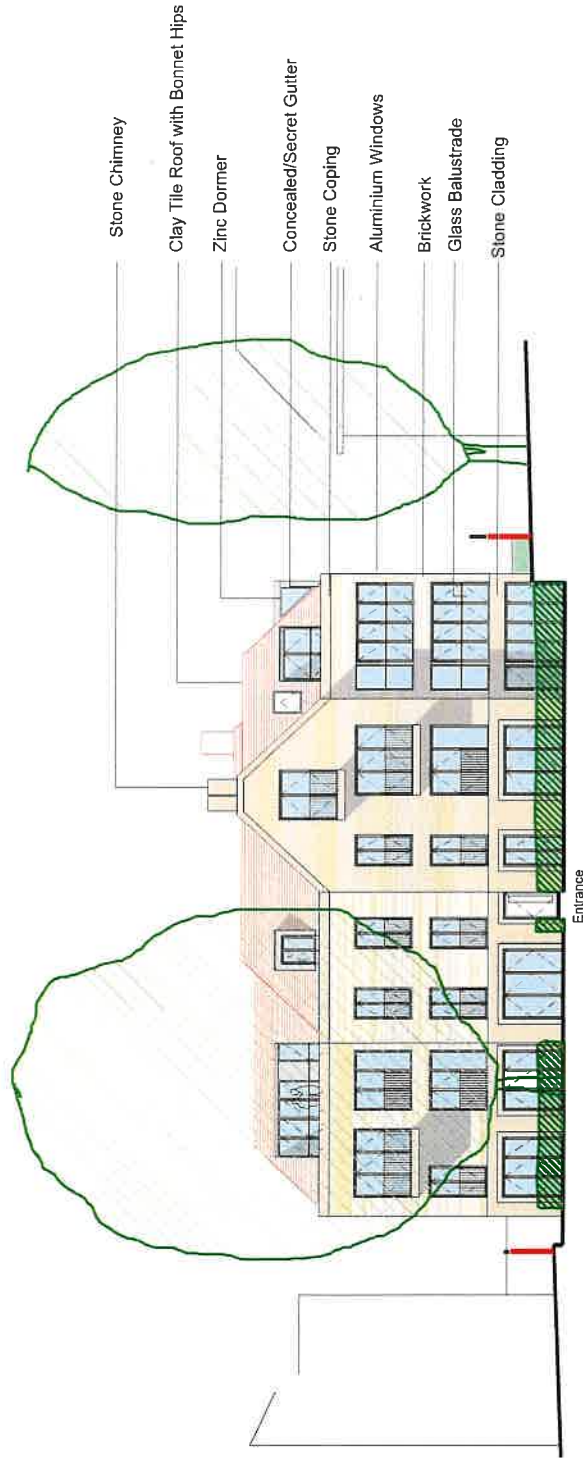
Front Elevation



Rev B - 28/10/2021 Amended Following Design Officer comments

G M L Architects  
 UNIT 3,1-4 Christina Street, London, EC2A 4PA  
 Tel: 020 7729 9595 Fax: 020 7729 1901 info@gmlearchitects.co.uk  
 SCALE: 1:200/3/3  
 PLANNING  
 FIRST ISSUED: JAN/2021  
 CHECK BY: WH DRAWN BY: JC 4828/PA20B

368 COCKFOSTERS ROAD, HADLEY WOOD  
 Street Elevation and Front Elevation



Neighbouring Development  
Amara Lodge

Neighbouring Development  
Kingsdale Court

Rev A - 28/10/2021 Amended Following Design Officer comments

0 20

368 COCKFOSTERS ROAD, HADLEY WOOD  
Rear Elevation

G M L Architects

UNIT 3, 1-4, Chelsea Street, London, EC2A 4PA  
Tel: 020 7729 9595 Fax: 020 7729 1001 info@gmlarchitects.co.uk

SCALE: 1:200000  
ISSUED FOR: PLANNING  
FIRST ISSUED: JAN 2021  
CHECK BY: WH DRAWN BY: PC

4828/PA21A

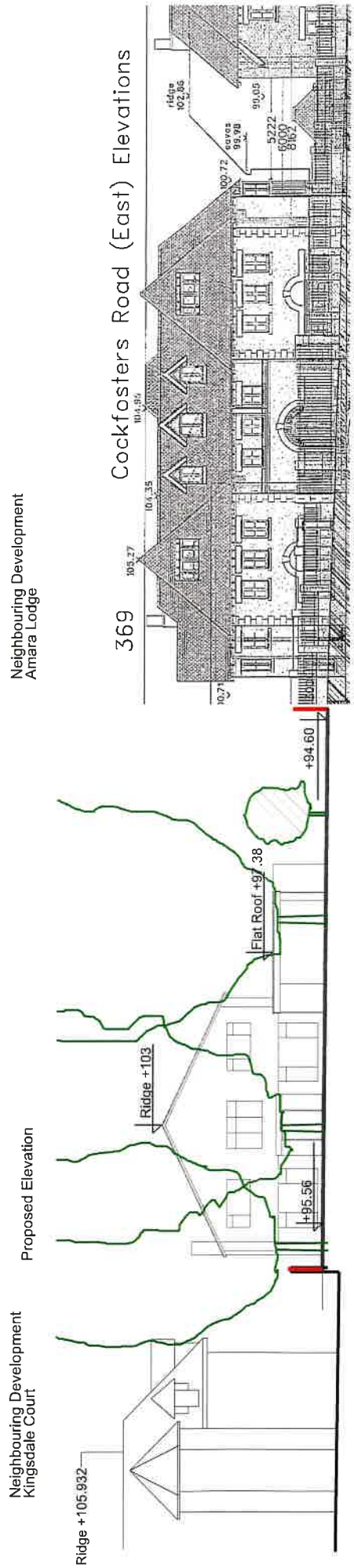
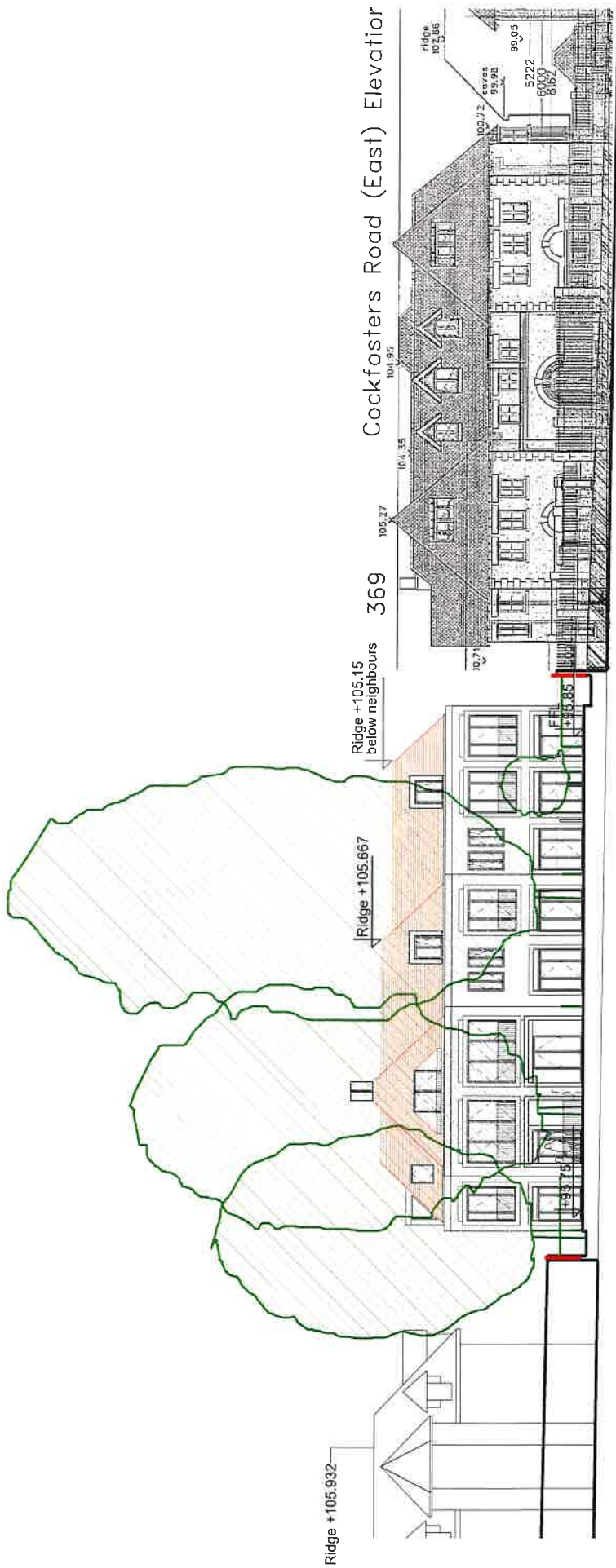


South Elevation

Rev C - 01/12/2021 Roof light to North elevation amended following Design Officer comments  
 Rev B - 28/10/2021 Amended Following Design Officer comments

368 COCKFOSTERS ROAD, HADLEY WOOD  
 North and South Elevations  
**G M L Architects**  
 UNIT 3,1-4 Chelsea Street, London, EC2A 4PA  
 Tel: 020 7729 9595 Fax: 020 7729 1801 [info@gmlearchitects.co.uk](mailto:info@gmlearchitects.co.uk)  
 SCALE: 1:200@A3  
 ISSUED FOR: PLANNING  
 FIRST ISSUED: JAN/2021  
 CHECK BY: WH  
 DRAWN BY: PC  
 4828/PA22D

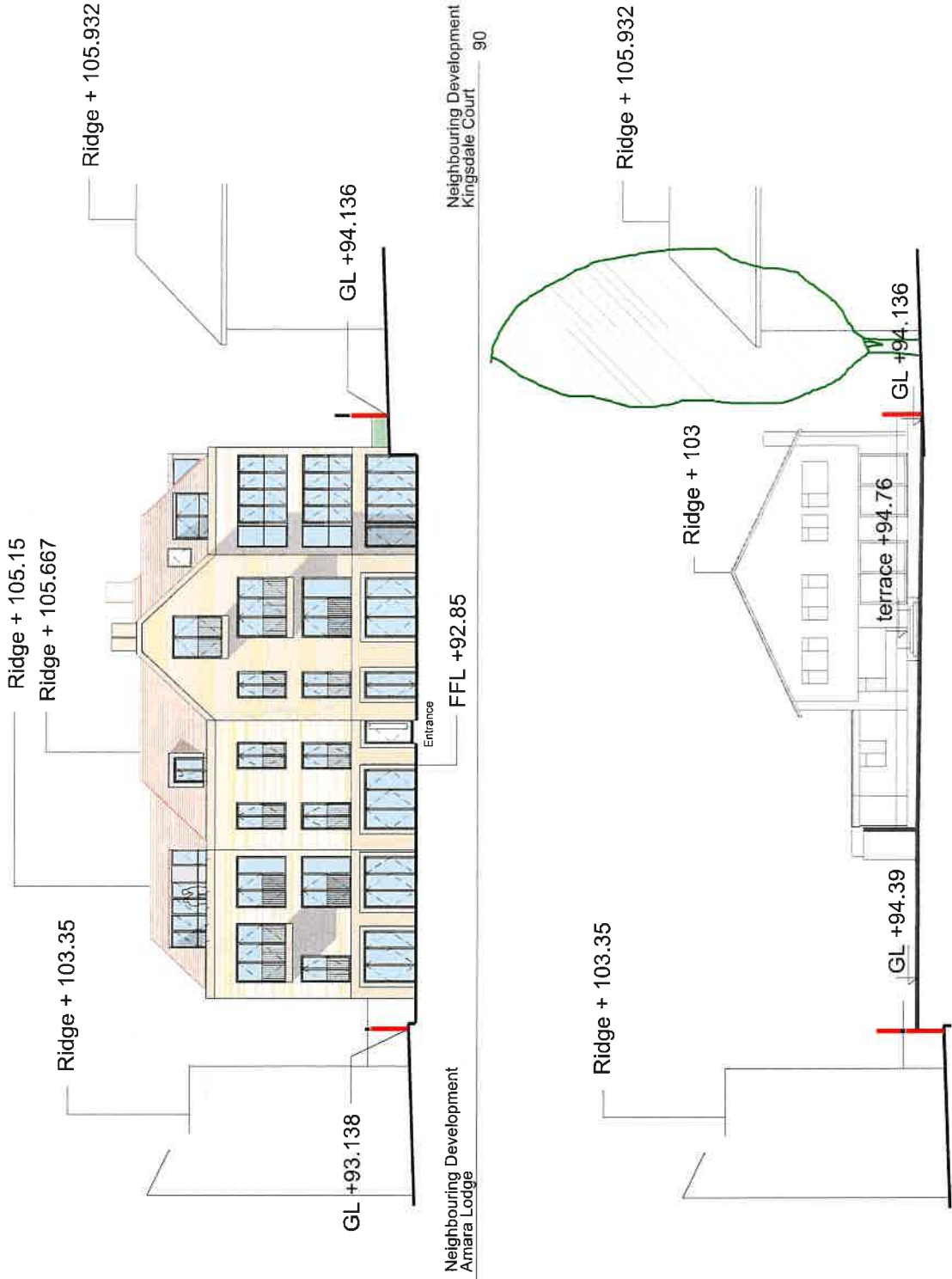




G M L Architects

UNIT 3 1-4 Chelsea Street London EC2A 4PA  
 Tel: 020 7729 9595 Fax: 020 7729 1011 info@gmllarchitects.co.uk  
 SCALE: 1:200/3/4  
 PLANNING  
 ISSUED FOR: JAN 2021  
 FIRST ISSUED: DRAWN BY: WH  
 CHECK BY: PC  
 4828/PA24

368 COCKFOSTERS ROAD, HADLEY WOOD  
 Existing and Proposed Cross Sections  
 Cockfosters Road



Rev A - 28/10/2021 Amended Following Design Officer comments

368 COCKFOSTERS ROAD, HADLEY WOOD  
Existing and Proposed Cross Sections  
Rear Elevation

G M L Architects

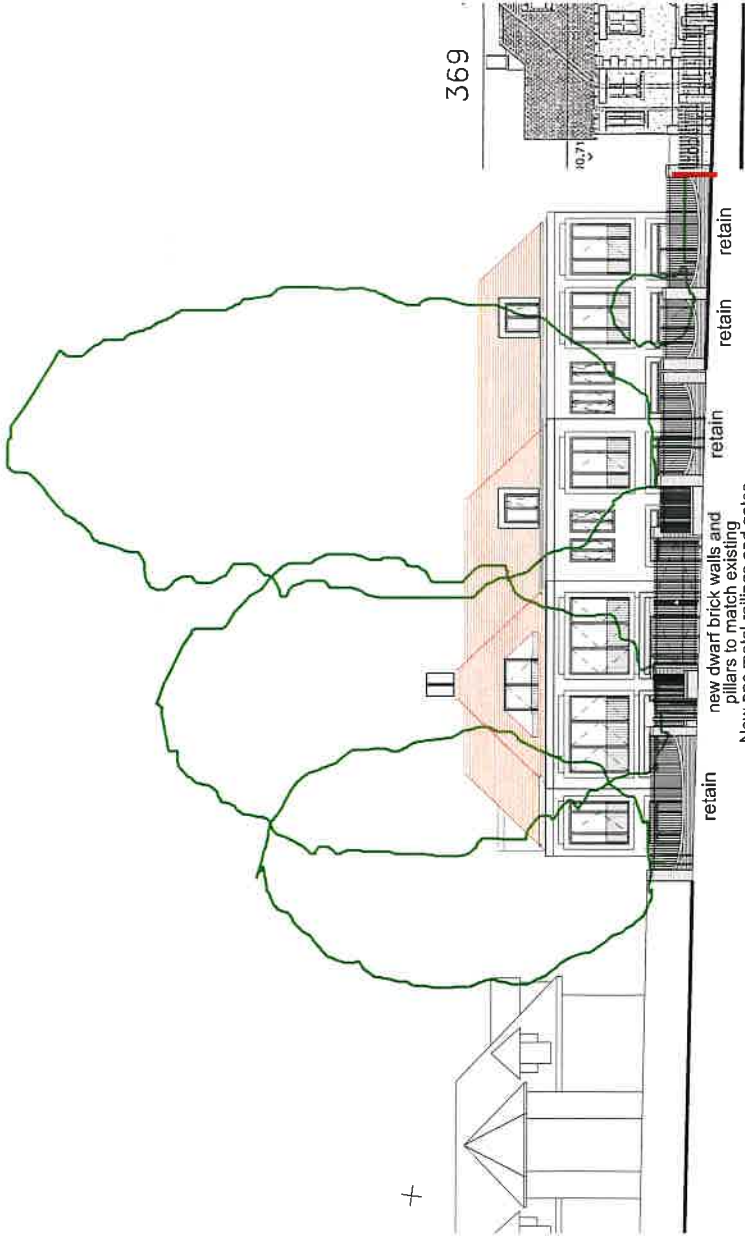
UNIT 3.1-4 Christina Street, London, EC2A 4PA  
Tel: 020 7729 9595 Fax: 020 7729 1801 info@gmlarchitects.co.uk  
SCALE: 1:200@A3  
ISSUED FOR: PLANNING  
DATE SUBMITTED: JAN 2021  
DRAWN BY: CHEM/SY/HT  
PROJECT NO: 4828/PA25A



Existing boundary wall to be retained where possible and replicated where required



vertical bar fencing



Neighbouring Development  
Amara Lodge

Neighbouring Development  
Kingsdale Court

Street Elevation



Rear Elevation - PPC Metal Palisade Fence  
Refer to landscape scheme for details of planting  
20

368 COCKFOSTERS ROAD, HADLEY WOOD  
Front and Rear Boundary Elevations

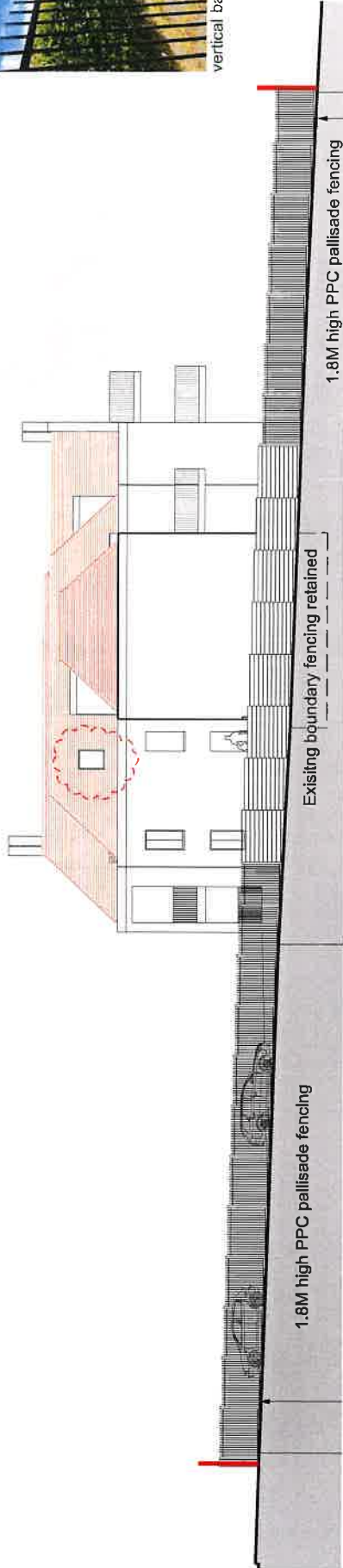
Rev B - 09/03/2022 Amended Following LPA comments  
Rev A - 28/10/2021 Amended Following Design Officer comments

G M L Architects  
UNIT 3-14, Christine Street, London, EC2A 4PA  
Tel: 020 7729 9595 Fax: 020 7729 1901 info@gmllarchitects.co.uk

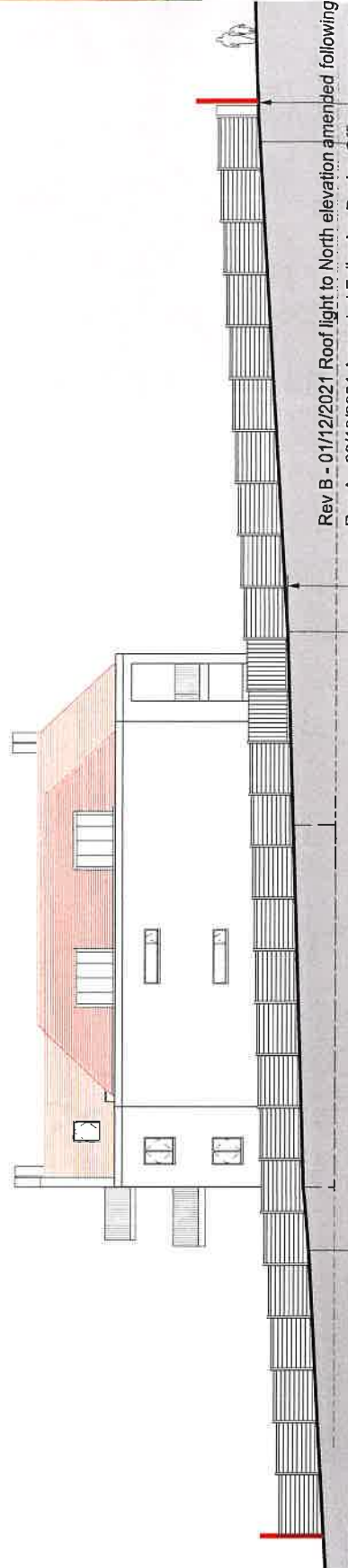
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ISSUED FOR: PLANNING  
FIRST ISSUED: JAN 2021  
CHECK BY: WH  
DRAWN BY: PC  
4828/PA266B



vertical bar fencing



vertical timber fencing example



Rev B - 01/12/2021 Roof light to North elevation amended following Design Officer comments  
 Rev A - 28/10/2021 Amended Following Design Officer comments

368 COCKFOSTERS ROAD, HADLEY WOOD  
 North and South Boundary Elevations

UNIT 3, 1-4 Chislehurst Street, London, E22A 4PA  
 TEL: 020 7728 9599 Fax: 020 7729 1801 info@ghmlharchitects.co.uk  
 WWW: www.ghmlharchitects.co.uk  
 ISSUED FOR: PLANNING  
 FINISH ISSUED: JAN-2021  
 CHECK BY: WH DRAWN BY: PC

G M L Architects

4828/PA27B



Proposed View Looking NE

Rev A - 28/10/2021 Amended Plan as Design Officer comments

368 COCKFOSTERS ROAD, HADLEY WOOD  
3D VIEW

G M L Architects

UNIT 3-14 Christina Street, London, EC2A 4PA  
Tel: 020 7729 9595 Fax: 020 7729 1801 info@gmlarchitects.co.uk  
SCALE: PLANNING  
ISSUED FOR: NTS  
FIRST ISSUED: CANNON  
DRAWN BY: PC CHECK BY: PC  
4828/PA28A



Proposed View Looking NE

Rev A - 28/10/2021 Amended Plan as Design Officer comments

368 COCKFOSTERS ROAD, HADLEY WOOD  
3D VIEW

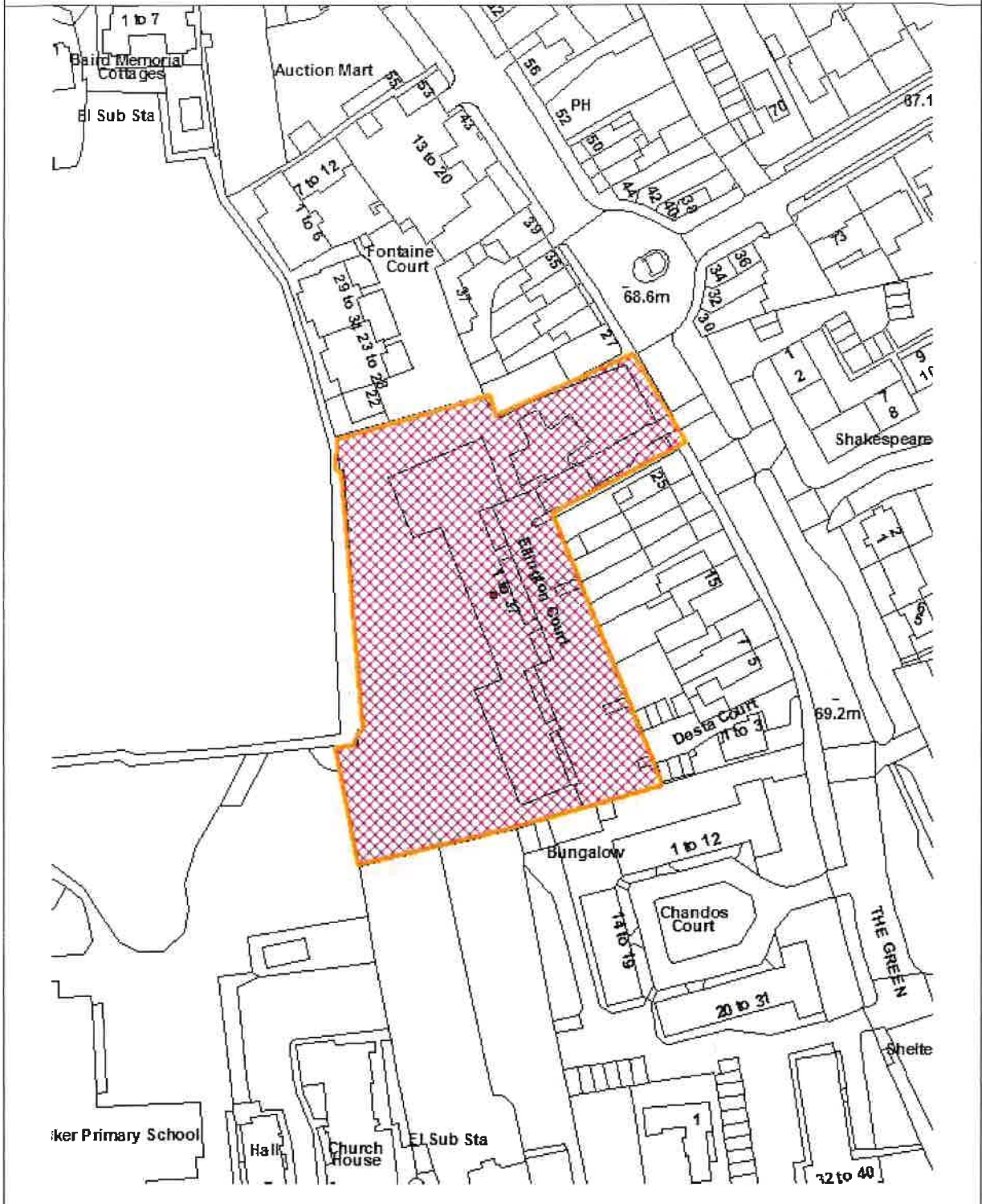
G M L A r c h i t e c t s

UNIT 3,1-4 Christina Street, London, EC2A 4PA  
 Tel: 020 7728 6595 Fax: 020 7729 7807 info@gmarchitects.co.uk  
 SCALE: NTS  
 ISSUED FOR: PLANNING  
 FIRST ISSUED: 08/17/2021  
 DRAWN BY: PC CHECK BY: PL

4828/PA29A

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE	Date: 18 July 2023	
Report of Director of Planning and Growth - Brett Leahy	Contact Officers: Michael Kotoh-Mortty Claire Williams	Category Full Application
Ward Southgate	Councillor Request on 28.08.20  Cllr Derek Levy	
LOCATION: Land rear of Ellington Court, Southgate N14 6LB		
APPLICATION NUMBER: 20/01982/FUL		
PROPOSAL: Erection of a residential building (use class C3) with associated amenity space, landscaping, disabled car parking, cycle parking and associated works.		
Applicant Name & Address:  Akelius UK Twelve Ltd  c/o Agent	Agent Name & Address:  Mr Julian Sutton JMS Planning & Development Ltd Build Studios 203 Westminster Bridge Road London SE1 7FR	
RECOMMENDATION:		
<ol style="list-style-type: none"> <li>1. That the Head of Development Management be authorised to GRANT planning permission subject to conditions.</li> <li>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.</li> </ol>		

Ref: 20/01982/FUL LOCATION: Land Rear Of Ellington Court , High Street, Southgate, N14 6LB



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Scale 1:1250

North





- 1.0 Note for Members:
- 1.1 Although an application of this scale and nature would normally be determined under delegated authority, the application has been reported to committee for determination at the request of Councillor Derek Levy due to the level of local interest.
- 2.0 Recommendation
- 2.1 That the Head of Development Management be authorised to GRANT planning permission subject to the following conditions:
  1. Time limit
  2. Approved Plans
  3. Details of external materials
  4. Detailed drawings of external materials to scale of between 1:20 and 1:1
  5. No additional fenestrations
  6. Details of levels
  7. Sustainable Drainage Systems (SuDS)
  8. Water consumption
  9. Energy statement
  10. EPC
  11. Cycle parking details
  12. Refuse details
  13. Construction Management Plan
  14. Tree Protection
  15. Tree replacement
  16. Soft Landscaping
  17. Boundary treatment
  18. Biodiversity Enhancements
  19. Installation of green roof
  20. Hard Surfacing
  21. External lighting
  22. Details of levels
  23. M4(3) Building regulations
  24. Details of 1x disabled parking space
  25. Communal garden management plan
  26. Removal of PD Rights

- 2.2 That the Head of Development Management be authorised to GRANT planning permission subject to conditions.

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

### 3.0 Executive Summary

- 3.1 The applicant seeks permission to erect a two storey residential building with a flat roof at the rear of Ellington Court to accommodate 6 flats with associated amenity space and parking.

- 3.2 There were several objections and concerns regarding the initial submission which detailed a three storey residential development that entailed 9 units. However, the scheme has been amended to acceptably overcome previous concerns. The revised scheme includes a reduction in the height of the proposed building by one floor to realise a two storey development at the site to provide 6 units.

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

- 1) The proposal would add six new residential units of accommodation to the Borough's housing stock.
- 2) The scheme would provide 4x3bed family units, 1x1 bed unit and 1x2bed unit.
- 3) The quality of accommodation that would be provided is of an acceptable standard.
- 4) There is no identified adverse impact on neighbouring residential amenity or the Conservation Area.
- 5) There are no identified adverse effects on highway safety or traffic generation.

### 4.0 Site and Surroundings

- 4.1 The application site comprises 1-49 Ellington Court which is a four-storey residential block that accommodates 49 residential flats. Communal gardens are located to the rear of the site and measures approximately 2,469 square metres.

- 4.2 The building was designed by renowned architect Sir Frederick Gibberd and is sited within the Southgate Green Conservation Area. The Character Appraisal indicates that Ellington Court dates between 1936-1950 and the property is identified as a neutral building. Owing to its demonstrable architectural interest as an inter-war Art Deco structure and its association with the pioneer of British modernist apartment buildings, Sir Frederick Gibberd, the site can be considered as a Non-Designated Heritage Asset (NDHA).

- 4.3 The development pattern within the vicinity features a variety of build forms, scale and designs. The rear boundary of the site abuts Walker Primary School to the west, alongside Walker Cricket Ground which is a designated Local Open Space. To the north is a row of two storey residential properties and a block of flats. There are a row of two storey residential properties to the east which partially screen off Ellington Court from views along the High Street. The south of the site is bounded by a group of terraced residential properties that are three storey in height.

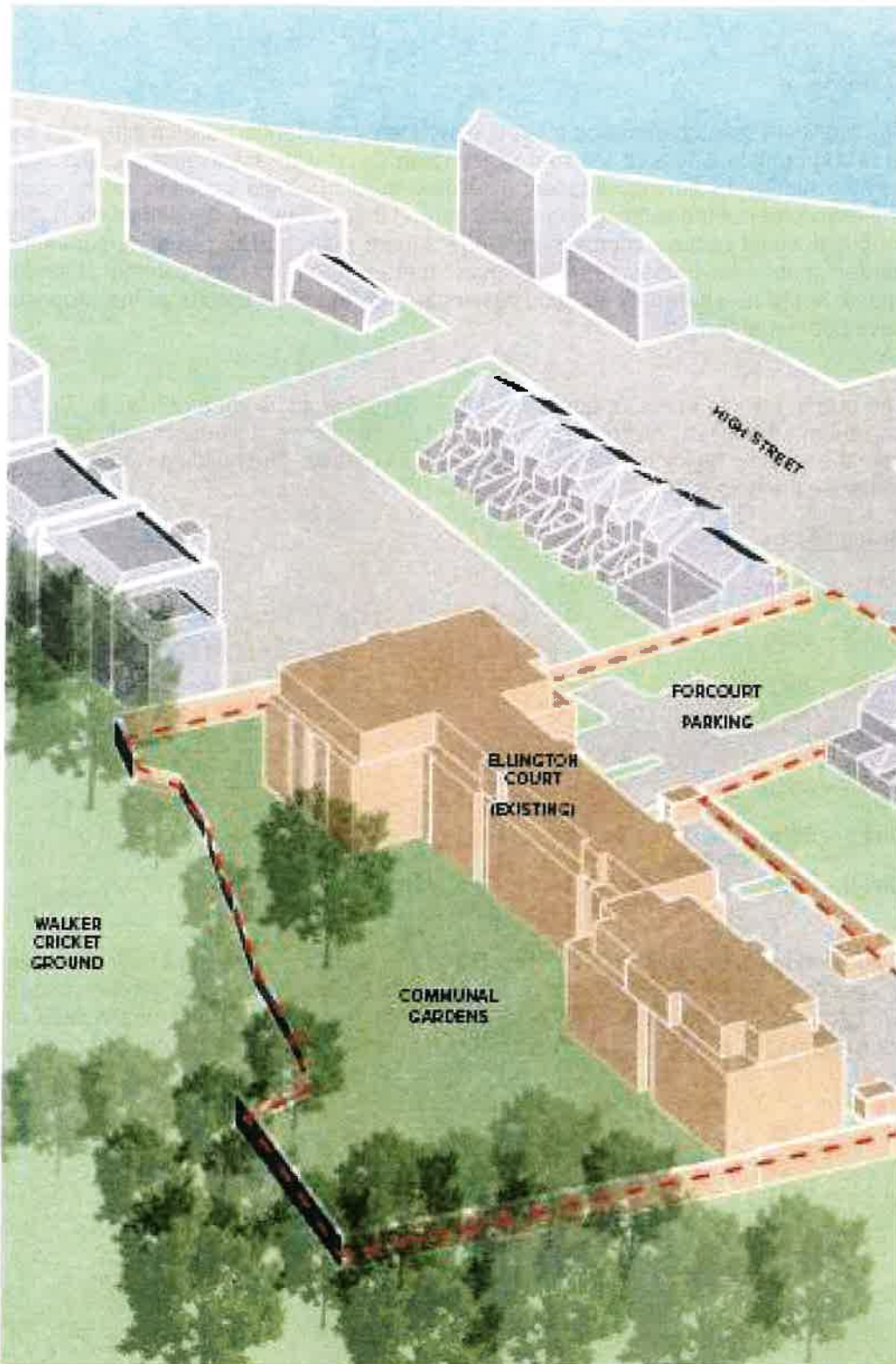


Figure 1: Site context

5.0 Proposal

5.1 The applicant seeks permission to erect a two storey residential building with a flat roof to accommodate 6 flats at the rear of Ellington Court with associated car and cycle parking alongside amenity spaces. The new building would be sited to the south western corner of the existing communal garden that serves the residential court. The proposal would occupy approximately 697 square metres of the existing communal garden space which measures 2469 square metres. The remaining communal garden space would be shared by existing residents and future occupants of the proposed development at the site.

5.2 The building would measure approximately 7.13 metres in height and have a maximum width of 24.59 metres and depth of 23.50 metres. It would be set away from the existing building by approximately 10.74 metres. The building would comprise the following:

Ground Floor

Unit 1 – 3b5p

Unit 2 – 3b6p

Unit 3 – 2b4p

First Floor

Unit 4 – 3b5p

Unit 5 – 3b6p

Unit 6 – 1b2p

5.3 Cycle parking is proposed to the north of Ellington Court together with a new pedestrian access that leads to the proposed residential development at the rear garden space of Ellington Court. The Agent has clarified that there are 37 existing unallocated car parking spaces at the frontage of Ellington Court and these parking spaces could be

utilised by the future occupants of the proposed residential development. One new disabled parking space is sited to the front of the site.

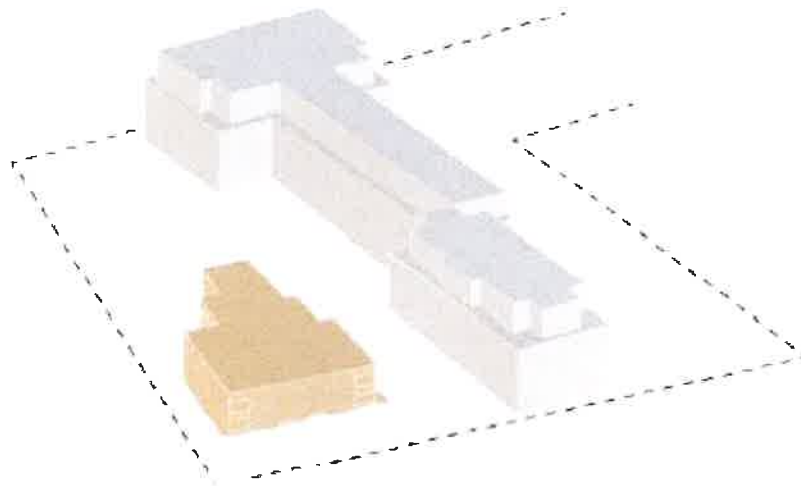
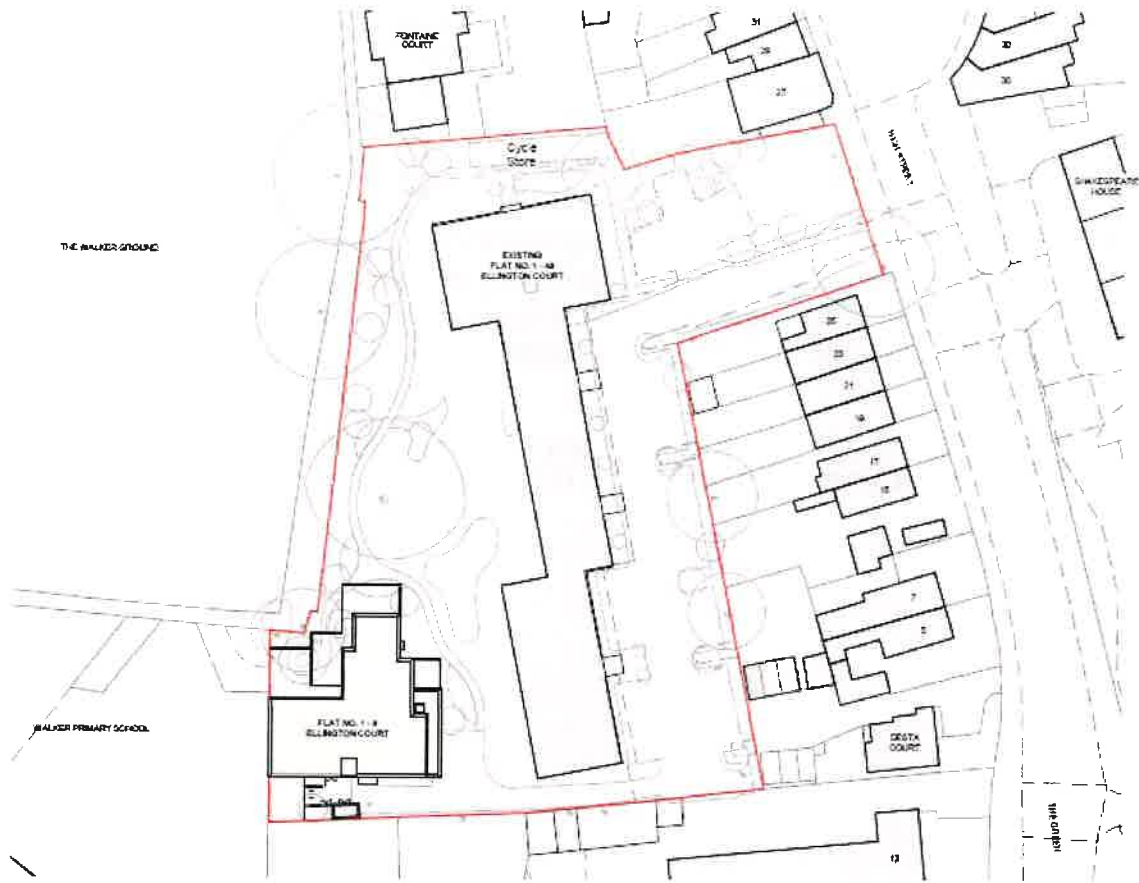


Figure 2: Proposed Block Plan and scale.

- 5.4 The initial proposal detailed a flat roofed three storey 9 unit residential development and following discussions with the agent regarding the scale and impact of the proposal on the setting, the scheme has subsequently been revised to feature a scale-down to 6 units by removing the initially proposed second floor. Hence, the design of the revised scheme is now a two storey residential development.
- 6.0 Relevant Planning History
- 6.1 19/00494/FUL - Refurbishment and improvement of existing building and grounds, including new windows, entrance doors, boxing to conceal pipework on primary elevation, new access doors and terraces to ground floor flats, landscaping works and front/street wall.: GRANTED with Conditions on 03.04.2019.
- 6.2 19/00475/PREHER - Proposed extension to existing building to create 13 residential units.: Pre-application advice given on 13.09.2019.

## 7.0 Consultation

Public

- 7.1 A site notice was put up as the application falls within the Southgate Green Conservation Area. The proposal was also advertised in the Enfield Independent.

Number notified	102
Representations made	2
Objections	2
Other / support comments	0

In summary, the objections raise the following concerns:

- Impact on existing rear communal space; little space would be left for residents.
  - The site is already densely populated with 40 flats.
  - Impact on existing rear trees which sustain wildlife. The application site is not a wasteland.
- 7.2 An objection was received from Cllr Levy stating that the initial proposal had several concerns on policy grounds and that it was a departure from the Local Plan. The case was therefore called in to committee should Officers be minded to approve the proposal.
- 7.3 Officer response: The concerns will be discussed in more detail in the analysis section of the report.

Internal and third-party consultees

## 7.4

<u>Consultee</u>	<u>Objection</u>	<u>Comment</u>
Conservation Officer	No	Objections removed following receipt of revised plans. Materials conditions suggested.
Traffic and Transportation	No	Objections removed following receipt of revised details.
Tree Officer	No	Objections removed following receipt of revised details. Condition suggested.

8.0 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 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 (2014); and The London Plan (2021).

National Planning Policy Framework (2021)

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

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

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

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

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

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

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

8.7 Paragraph 197 of the National Planning Policy Framework states that:

“In determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- The desirability of new development making a positive contribution to local character and distinctiveness.”

Furthermore, at Paragraphs 199 and 200, it states:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

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

Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

#### The London Plan (2021)

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

GG1 Building strong and inclusive communities  
GG2 Making the best use of land  
GG3 Creating a healthy city  
GG5 Growing a good economy  
GG6 Increasing efficiency and resilience  
D1 London's form, character and capacity for growth  
D3 Optimising site capacity through the design-led approach  
D4 Delivering good design  
D6 Housing quality and standards  
D11 Safety, security and resilience to emergency  
D12 Fire safety  
D14 Noise  
H1 Increasing housing supply  
HC1 Heritage conservation and growth  
SI12 Flood risk management  
T2 Healthy Streets  
T4 Assessing and mitigating transport impacts  
T5 Cycling  
T6.1 Residential parking

Core Strategy (2010)

- 8.9 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:

CP2 Housing supply and locations for new homes  
CP4 Housing quality  
CP5 Housing types  
CP6 Meeting particular housing needs  
CP20 Sustainable energy use and energy infrastructure  
CP21 Delivering sustainable water supply, drainage and sewerage infrastructure  
CP22 Delivering sustainable waste management  
CP25 Pedestrians and cyclists  
CP28 Managing flood risk through development  
CP30 Maintaining and improving the quality of the built and open environment  
CP31 Built and Landscape Heritage  
CP32 Pollution  
CP36 Biodiversity  
CP46 Infrastructure contributions

Development Management Document (2014)

- 8.10 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:

DMD3 Providing a mix of different sized homes  
DMD6 Residential character  
DMD8 General standards for new residential development  
DMD7 Development of Garden Land  
DMD9 Amenity space  
DMD10 Distancing  
DMD37 Achieving high quality and design-led development  
DMD38 Design process  
DMD44 Preserving Heritage Assets  
DMD45 Parking standards and layout  
DMD46 Vehicle Crossovers and Dropped Kerbs  
DMD47 Access, new roads and servicing  
DMD49 Sustainable Design and Construction Statements  
DMD50 Environmental Assessment Methods  
DMD51 Energy efficiency standards  
DMD53 Low and Zero-Carbon Technology  
DMD56 Heating and cooling  
DMD58 Water efficiency  
DMD59 Avoiding and reducing flood risk  
DMD60 Assessing flood risk  
DMD 61 Managing surface water  
DMD 68 Noise  
DMD78 Nature Conservation  
DMD80 Trees on development sites  
DMD81 Landscaping

8.11 Other Material Considerations

National Planning Policy Framework (NPPF), 2021  
Nationally Described Space Standard (NDSS, 2015)  
London Plan Housing, Supplementary Planning Guidance (2016)  
Southgate Green Conservation Area Character Appraisals  
Southgate Green Conservation Area Management Appraisals  
Manual for Streets 1 & 2  
Revised Technical Standards for Footway Crossovers 2013  
Enfield 'Waste and Recycling Storage' Planning Guidance (2019)

Enfield Local Plan (Reg 18) (2021)

- 8.12 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.
- 8.13 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.
- 8.14 Key local emerging policies from the plan are listed below:

SE1 Responding to the climate emergency  
SE2 Sustainable design and construction

SE4 Reducing energy demand  
SE5 Greenhouse gas emissions and low carbon energy supply

SE6 Renewable energy development  
SE7 Climate change adaptation and managing heat risk  
SE9 Protection and improvement of watercourses  
SE10 Sustainable drainage systems  
BG2 Protecting nature conservation sites  
BG3 Biodiversity net gain, rewilding and offsetting  
BG7 Watercourses  
BG8 Urban greening and biophilic principles  
BG11 Blue and green infrastructure plans  
DE1 Delivering a well-designed, high quality and resilient environment  
DE13 Housing standards and design  
D3: Inclusive design  
T1: Promoting sustainable transport  
ENV1: Local environmental protection  
D1: Securing contributions to mitigate the impact of development

## 9.0 Assessment

The main issues arising from this proposal to consider are:

1. Principle of development
2. Quality of accommodation
3. Character and appearance within the Conservation Area
4. Impact upon the amenity of neighbours
5. Parking and cycle parking
6. Trees
7. Biodiversity
8. SuDS

### Principle of development

- 9.1 Paragraph 11(d) of the NPPF, and the application of the tilted balance means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, which also includes the Development Plan. Moreover, planning permission should be approved unless “the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”. The NPPF and London Plan advise that local authorities should seek to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Policy GG1 of the current London Plan recognises the need for more homes in London to promote opportunity and choice in ways that meet their needs at a price that is affordable. Policy GG4 of the London Plan also encourages the Council to provide a range of housing choices in order to take account of the various groups. Housing should be provided across a range of different sizes and types taking account of the requirements of different user groups.
- 9.2 Policy CP 5 of the Core Strategy seeks to ensure that new developments offer a range of housing sizes to meet housing needs whilst ensuring that the quality and character of existing neighbourhoods is also respected. There is greatest need in the Borough for family sized housing with 3+ bedrooms, however the Borough requires housing of all sizes and six additional flats would add to the Borough’s housing stock and would contribute to the strategic objectives of the Borough.

- 9.3 Policy DMD7 (Garden Land) specifies that all new residential development must meet the following criteria:
- a. The development does not harm the character of the area;
  - b. Increased density is appropriate, taking into account the site context in terms of its location, accessibility and the provision of local infrastructure;
  - c. The original plot is of a sufficient size to allow for additional dwellings which meet the standards in DMD8 'General Standards for New Residential Development', (and other design policies);
  - d. The individual plot sizes, orientation and layout created are appropriate to, and would not adversely impact on the residential amenity within the development, or the existing pattern of development in that locality;
  - e. An adequate amount of garden space is retained within both of the individual plots in accordance with the minimum amenity space standards (DMD 9 'Amenity Space'), and the role of each space is enhanced to contribute towards other plan objectives such as biodiversity; green corridors and networks; flood risk; climate change; local context and character; and play space; and
  - f. The proposals would provide appropriate access to the public highway.
- 9.4 The proposed two storey residential development would sit at the rear garden of the four storey existing residential block at Ellington Court and the proposal would not be visible at the front street. This aspect of the proposal would accord with DMD6, DMD10, DMD37, DMD44 with no visual damage on the streetscene. The revised scheme features brickwork and fenestrations that would appear sympathetic to the character of the host property and therefore the proposal alongside with the reduced scale would not be conspicuous at this location in view of policy DMD6. The scheme would be well embedded at the rear elevation of the host residential block with no significant visual impact to the character of the Conservation Area, having regard to policy DMD44. Furthermore, the retained rear garden space at Ellington Court would be sufficient to provide communal amenity to both existing and future occupiers of the new development in view of policy DMD7 and in this regard, the proposal would not compromise amenity provision at the site. The other aspects of DMD7 will be discussed in more detail in other sections of this report.
- 9.5 Significant weight must be attributed to the presumption in favour of approving sustainable residential development and the planning merits of providing new homes. However, these planning merits must be balanced against all other relevant planning considerations which seek to ensure that appropriate regard is given to design, impact on the character of the area, residential amenity, traffic generation and highway safety and acceptability with regards to sustainability and flooding.

#### Housing Mix

- 9.6 The revised scheme features 4 x 3b units, 1 x 2b unit, 1 x 1bp unit respectively which would provide a mix of housing types at this location with a greater number of three bed family units which is welcomed and thereby contributing towards the Council's housing targets.

Unit sizes and quality of accommodation

- 9.7 Policy D6 of the London Plan (2021) Table 3.1 refers to the Technical Housing Standards - nationally described space standards, which stipulates the minimum space standards for new development. The proposed dwelling would be expected to meet and where possible exceed these minimum standards and those contained within the Housing Supplementary Planning Guidance SPG (March 2016).

Unit	Dwelling type (bedroom (b)/persons-bedspaces (p))	Required GIA (sq.m) in London Plan	GIA (sq.m)
Flat 1	3b5p	86	93
Flat 2	3b6p	95	96
Flat 3	2b4p	70	85
Flat 4	3b5p	86	93
Flat 5	3b6p	95	110
Flat 6	1b2p	50	56

- 9.8 The submitted plans indicate that the gross internal areas of the proposed units would accord with policies D6 of the London Plan (2021), CP4 of the Core Strategy and the Technical Housing Standards – Nationally Described Space Standard (March 2015). It should also be noted that any area with a headroom of less than 1.5 metres is not counted within the Gross Internal Area unless used solely for storage. A section drawing has been provided on the submitted plans which shows the internal height of the residential block would be 2.46m on both floors and therefore the stated head height would accord with the minimum requirement of 2.3m in line with policy D6. The submission shows that there would be reasonable space to stand in the main areas of the new dwelling, dual aspect units are proposed, and the habitable rooms would gain sufficient natural lighting. The proposal would therefore realise good quality accommodation that would contribute towards the Council's housing stock.

Amenity space

- 9.9 DMD9 of the Development Management Document seeks to ensure that new development retains sufficient amenity spaces. The submitted floorplans indicate that the proposed amenity space for the development would be the following:

Unit	Dwelling type (bedroom (b)/persons-bedspaces (p))	Minimum required amenity space in policy DMD 9 (sq.m)	Proposed amenity space (sq.m)
Flat 1	3b5p	8	31
Flat 2	3b6p	9	48

Flat 3	2b4p	7	31
Flat 4	3b5p	8	8
Flat 5	3b6p	9	10
Flat 6	1b2p	5	8

The above arrangement would accord with the minimum requirements under policy DMD9 of the DMD.

#### Design and Impact on Conservation Area

- 9.10 Policy DMD6 of the DMD provides standards for new development with regard to scale and form of development, housing quality and density. Policy DMD8 provides general standards for new residential development and reiterates the requirement for a development to be of an appropriate scale, mass and bulk, provide high quality amenity space and provide access to parking and refuse areas. DMD37 encourages achieving a high quality and design led development, which is reiterated within policies D4 and D8 of the London Plan (2021).
- 9.11 The existing development pattern on the streetscene features a variety of properties that generally maintain a uniformity in scale and character.
- 9.12 Earlier concerns were raised by the Heritage Advisor and Cllr Levy regarding the impact of the proposal on the Conservation Area. These concerns have now been addressed under the revised scheme through a reduction in the scale of the proposal from the initial three storey 9 unit development to a two storey six unit development and in this regard, the revised scheme would be more of a subservient addition to the rear garden of the host property at Ellington Court, thereby seamlessly assimilating into the existing development pattern within the Conservation Area and the revised proposal would accord with policies DMD6 and DMD44.
- 9.13 The proposed two storey residential development would sit at the rear garden of the four storey existing residential block at Ellington Court and the proposal would not be visible at the front street. This aspect of the proposal would accord with DMD6, DMD10, DMD37, DMD44 with no visual damage on the streetscene. The revised scheme features brickwork and fenestrations that would appear sympathetic to the character of the host property and therefore the proposal alongside with the reduced scale would not be conspicuous at this location in view of policy DMD6. The scheme would be well embedded at the rear elevation of the host residential block with no significant visual impact to the character of the Conservation Area, having regard to policy DMD44. Furthermore, the retained rear garden space at Ellington Court would be sufficient to provide communal amenity to both existing and future occupiers of the new development in view of policy DMD7 and in this regard, the proposal would not compromise amenity provision at the site.
- 9.14 Appropriate conditions relating to external materials will be attached to the permission to ensure that a high quality design is achieved on the site.

#### Impact upon the amenity of neighbours

- 9.15 Policies DMD8 and DMD10 of the Development Management Document refer to neighbouring amenities and distancing standards. DMD10 sets out minimum distances between rear windows however given the siting of the new building.

However the most appropriate standard would be the minimum separation distance between windows and side boundaries of 11m.

- 9.16 The proposed east facing flank windows of the scheme would retain some 13-15m separation to the rear façade of the host property at Ellington Court and this would accord with policy DMD10 and would be sufficient spacing to ensure the proposal does exacerbate any impacts of overlooking, sense of enclosure or privacy at this location.
- 9.17 A daylight/sunlight report was submitted and assessed against the widely recognised standards set out in BRE's Daylight, Sunlight, and Overshadowing assessments to quantify the potential daylight and sunlight affect to the neighbouring residential properties in respect of the three storey building. The report has been undertaken by constructing a detailed 3D model of the existing and proposed development sites and surroundings, then using specialist computer software, daylight and sunlight simulations and numerical calculations are run within the 3D model environment.
- 9.18 The report concludes that the findings indicate that the development is not of an excessive scale for the immediate surrounding area in daylight and sunlight terms and will broadly meet the intentions of the BRE guide. It should be noted that the scale and massing of the building has been reduced by removing a storey so that the building comprises two stories rather than three which would further reduce any impact on the existing flats at Ellington Court. Consequently, it is considered that the proposal would meet the aims of the BRE Guidelines and would not impact on neighbouring properties in terms of loss of light.

#### Transportation, servicing and parking

- 9.19 The London Plan, Core Strategy and DMD policies encourage and advocate sustainable modes of travel and require that each development should be assessed on its respective merits and requirements, in terms of the level of parking spaces to be provided for example.
- 9.20 There are 33 existing car parking spaces on the site. The agent has clarified that only 22 of the existing 33 parking spaces are in use at the site. There are therefore 11 unallocated parking spaces at the site which could be utilised by the occupiers of the proposed development.
- 9.21 The PTAL of the site is 4, and it is a close to Southgate tube station (approx. 600m). This is an acceptable walking distance according to "Journeys on Foot" (Institute of Highways and Transportation) and therefore a relaxation of the parking standards could be permitted. The Transport Statement includes a parking survey on surrounding roads. It suggests that parking is approaching saturation with on average only five spaces being available over two nights. However, parking surveys were also undertaken and showed 11 spaces available in the existing car park out of 33 spaces. The Transportation team have confirmed that car parking provision is acceptable, and the agent has confirmed that the existing units could be redistributed to the new residential units. One disabled parking space is proposed and the exact location of this space will be conditioned.
- 9.22 A new pedestrian path is proposed which is welcomed to improve connectivity across the site. With regard to servicing the site can be serviced from within the existing site car park.
- 9.23 A total of 18 cycle spaces will be provided for the six units. There are also 48 spaces approved as retrospective provision for the existing units. This is welcomed and ensures cycle parking for both existing and proposed meets London Plan standards.



The location of cycle parking and refuse storage provision has been provided however full details have not been submitted and therefore this will be requested and secured through conditions.

#### Impact on trees at the site

- 9.24 The submitted details indicate that 5 individual trees and 2 groups of trees would be removed to facilitate the proposal and these trees are T3 (category U), T9 (category B1), T12 (category U), T13 (category U), T14 (category U) and group of trees G1 and G2 (category C), where category U refers to a tree that is Unsuitable for Retention, category C refers to a tree that is of Low Quality and Value whereas category B1 refers to a tree of Moderate Quality and Value. The submitted Tree Survey indicates that 14 individual trees would be retained at the site.
- 9.25 The initial proposal sought to retain tree T9, however, given that this tree would touch the proposed residential block, the Tree Officer recommended a removal of tree T9. The agent has agreed that this removed tree could be replaced elsewhere at the site by way of a tree condition and associated landscape condition. The Tree Officer has therefore recommended a condition to ensure that suitable replacement trees and landscaping are implemented at the site in line with policies DMD80 and DMD81.
- 9.26 The proposed loss of trees is not significant and clearly no significant or high value trees or quantity of trees are being removed. All other trees and vegetation can be retained. The Council's Tree Officer has reviewed the arboricultural report and is satisfied that the approach to the trees on the site is the correct one and has no objection.

#### Sustainable Drainage Systems (SuDS)

- 9.27 London Plan policies 5.12 and 5.13 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.
- 9.28 DMD61 ("Managing surface water") requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates. The scheme proposes a permeable pedestrian path and a green roof to the new two storey building. To fully ensure that the scheme accords with policy requirements a SuDS condition is recommended in view of policies DMD59 and DMD61 to ensure that the development is safe from flooding and does not increase the risk of flooding elsewhere.

#### Biodiversity

- 9.29 In accordance with policy requirements the scheme will need to incorporate biodiversity enhancements. If approved, conditions will be attached to ensure details

of ecological enhancements such as bat/bird boxes and appropriate landscaping are planted.

#### Sustainable Design and Construction

9.30 Policy DMD49 states all new development must achieve the highest sustainable design and construction standards and include measures capable of mitigating and adapting to climate change to meet future needs having regard to technical feasibility and economic viability. Policy DMD51 states further energy efficiency standards and that all developments will be required to demonstrate how the proposal minimises energy- related CO<sub>2</sub> emissions which must adhere to the principles of the energy hierarchy in the policy. This follows policy CP20 of the Core Strategy which states that the Council will require all new developments, to address the causes and impacts of climate change by:

- minimising energy use;
- supplying energy efficiently; and
- using energy generated from renewable sources in line with the London Plan and national policy.

9.31 An energy statement has been submitted which sets out that a minimum of 35% reduction of carbon emissions will be achieved and an air source heat pump will be incorporated within the scheme. To ensure the scheme achieves no less than 35% reduction in carbon emissions a condition will be attached to any permission.

#### Accessibility

9.32 Internally each floor will be served by an easy rise staircase and passenger lift. All dwellings are proposed to be designed to meet building regulation Part M4(2), with 1 no. Ground floor unit (Unit 3) is designed to meet Part M4(3) wheelchair adaptable/accessible units which is in accordance with policy requirements and will be secured through conditions.

10.0 Community Infrastructure Levy (CIL)

10.1 The proposed development would create new residential units and would therefore be liable to pay CIL at borough and mayoral levels, the applicable borough CIL Zone is the Higher Rate Eastern Zone (£120 per sqm) and Zone 2 for Mayoral (MCIL2, £60 per sqm). The Enfield CIL will be approximately £73,863.60 and the Mayoral CIL will be £36, 931.80.

11.0 Public Sector Equalities Duty

11.1 In line with the Public Sector Equality Duty the council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions including decision making on planning applications. These considerations include: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who

do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 11.2 The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above. In making this recommendation, due regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, marriage / civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).
- 11.3 When determining the planning application (and thereby accounting for the representations resulting from public consultation), the Council has considered the potential effects of the proposed development on those with protected characteristics as defined under the Equality Act 2010. In doing this, the Council has had due regard to equality considerations and attribute appropriate weight to such considerations. In providing the recommendation to Members that planning consent should be granted, officers have considered equalities impacts in the balance, alongside the benefits arising from the proposed development. The Council has also considered appropriate mitigation to minimise the potential effects of the proposed development on those with protected characteristics.
- 11.4 There are no statutory or regulatory requirements for the form or content of an equalities assessment. The scale and significance of such impacts cannot always be quantified, and it is common to address this through descriptive analysis of impacts and identifying whether such impacts are adverse or beneficial. The key elements of the Proposed Development which have an impact that could result in an equalities effect include the design and physical characteristics of the proposals subject to the planning application. Officers do not consider there would be a disproportionate equalities effect.
- 11.5 In line with the Human Rights Act 1998, it is unlawful for a public authority to act in a way which is incompatible with a Convention right, as per the European Convention on Human Rights. The human rights impact has been considered, with particular reference to Article 1 of the First Protocol (Protection of property), Article 8 (Right to respect for private and family life) and Article 14 (Prohibition of discrimination) of the Convention.
- 11.6 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest. The recommendation is considered appropriate in upholding the council's adopted and emerging policies and is not outweighed by any engaged rights.
- 12.0 Conclusion and Recommendation
- 12.1 The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF, and the application of the tilted balance means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, which also includes the Development Plan. Moreover, planning permission should be approved unless "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed".
- 12.2 Having regard to the assessment in this report, the development would provide additional residential units at the site. This would contribute towards the Borough's

strategic objectives in terms of delivering new homes. The quality of accommodation that the proposed 6 unit residential block would provide is acceptable, based on the up-to-date housing quality standards outlined in The London Plan (2021). The development would not result in the harmful overlooking of neighbours nor would it result in harm to the amenity and living conditions of neighbours or the Southgate Green Conservation Area.

- 12.3 It is considered that the form, design and appearance of development would not be significantly dissimilar to host residential block at Ellington Court and thus the proposed scheme would acceptably relate with the character of the surrounding Conservation Area.
- 12.4 The above assessment against the development plan policies has produced the following conclusion:
- The proposal would provide 6 new flats with an acceptable standard of accommodation that would contribute to the housing stock in the borough.
  - The proposed development is considered appropriate in form and design and would not result in detrimental harm to the character and appearance of the Conservation Area.
  - The proposal, by virtue of its form and small scale, would not harm the amenity of occupying and neighbouring residents.
  - There are no identified adverse effects on highway safety or traffic generation.
  - The reasons for the objections to the initial planning application have been acceptably overcome by the revised scheme.
- 12.5 Having regard also to the mitigation secured by the recommended conditions and the presumption in favour of sustainable development it is considered that the benefits of the development would outweigh any identified impacts. When assessed against the suite of relevant planning policies, it is considered that planning permission should be granted subject to conditions.

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with information provided by the engineers and other  
specialists.

REV. DATE. DESCRIPTION  
1. 12/01/2022. REVISION TO 2. 12/01/2022

REV. DATE

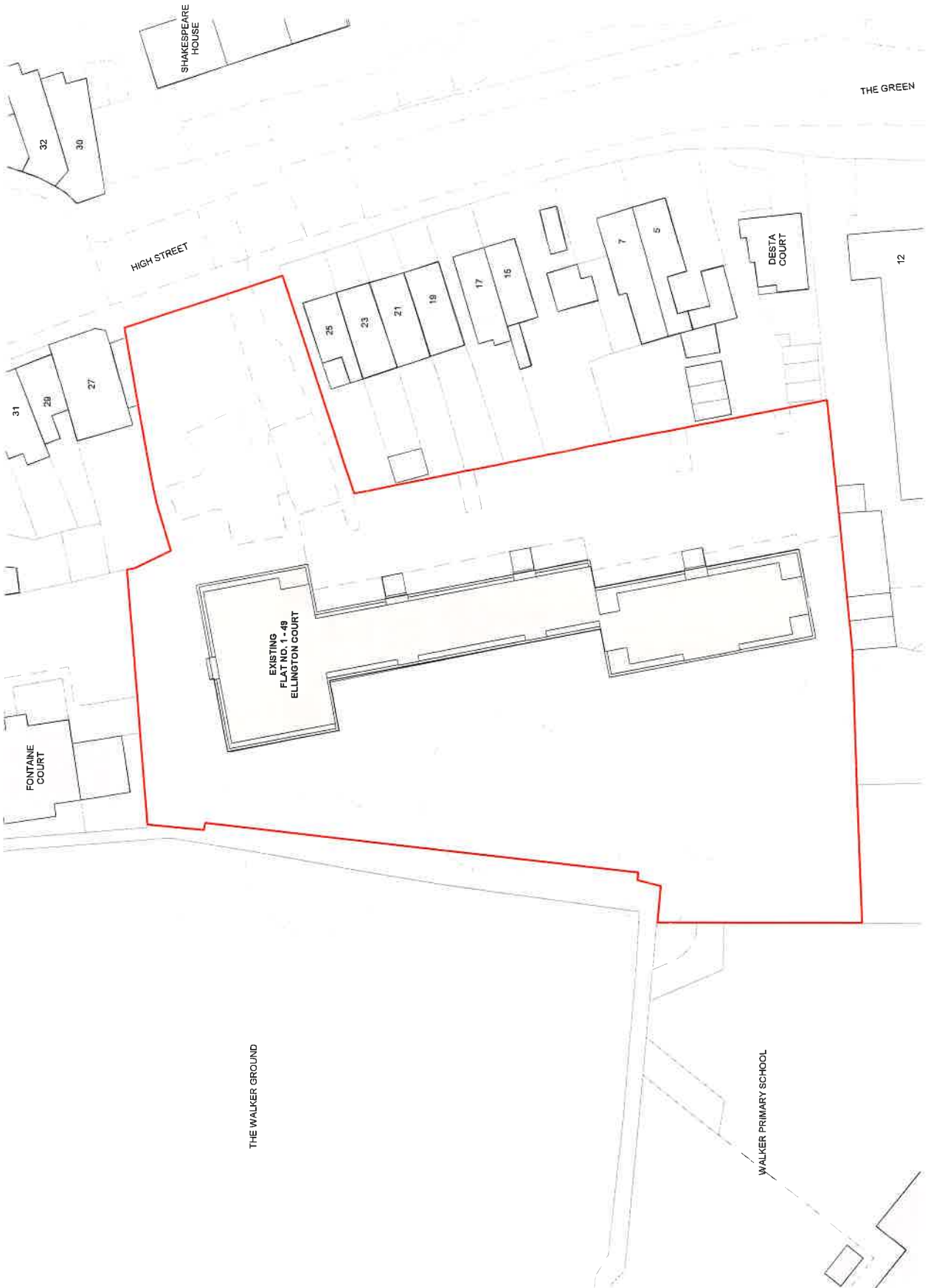
REV. DATE



PROJECT  
**Ellington Court**  
DRAWING  
**Existing Site Plan**

SCALE  
1 : 500 at A3 P01  
DRAWING NUMBER  
ELC-LGA-00-XX-DR-A-0101

DISCIPLINE  
**PLANNING**



**1 Existing Site Plan**  
Scale - 1:500

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REV.	DATE	DESCRIPTION
P01	2019/03/01	Final Design Stage 2 Review
P02	2019/03/01	Final Design Stage 2 Review
P03	2019/03/01	Final Design Stage 2 Review
P04	2019/03/01	Final Design Stage 2 Review
P05	2019/03/01	Final Design Stage 2 Review
P06	2019/03/01	Final Design Stage 2 Review

REV PLAN

INFORMATION

Key	Description
□	Proposed
□	Existing
□	Structural
□	Services
□	Other

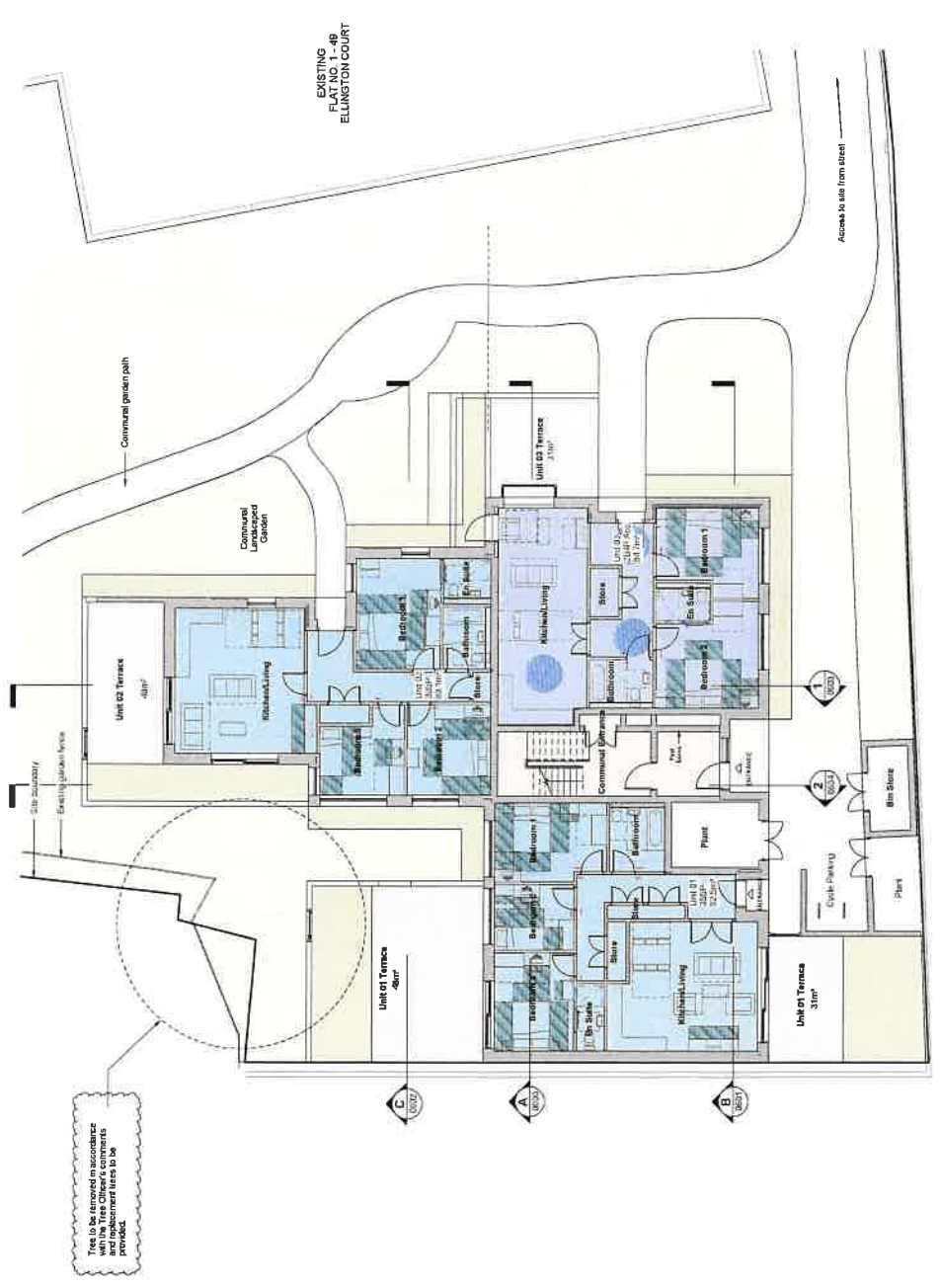


PROJECT  
**Ellington Court**  
 PROPOSED  
**Proposed Ground Floor  
 Plan**

SCALE  
**1 : 100 at A1**  
 REV  
**P06**

DRAWING NUMBER  
**ELC-LGA-00-00-DR-A-0200**

DRAWING STATUS  
**FOR INFORMATION**



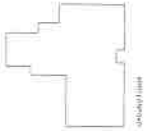
Note to be removed in accordance with the Title Clerk's comments and amendments to be provided.

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REV	DATE	DESCRIPTION
101	11/15/2019	Issue for Construction
102	11/15/2019	Issue for Construction
103	11/15/2019	Issue for Construction
104	11/15/2019	Issue for Construction

(REV. PLAN)



**DESCRIPTION**

- 1. General Notes: See all notes on all sheets.
- 2. All work shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.
- 3. All materials shall be of the highest quality and shall be approved by the architect.
- 4. All construction shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.
- 5. All construction shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.
- 6. All construction shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.
- 7. All construction shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.
- 8. All construction shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.
- 9. All construction shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.
- 10. All construction shall be in accordance with the latest editions of the International Building Code (IBC) and all applicable local codes.

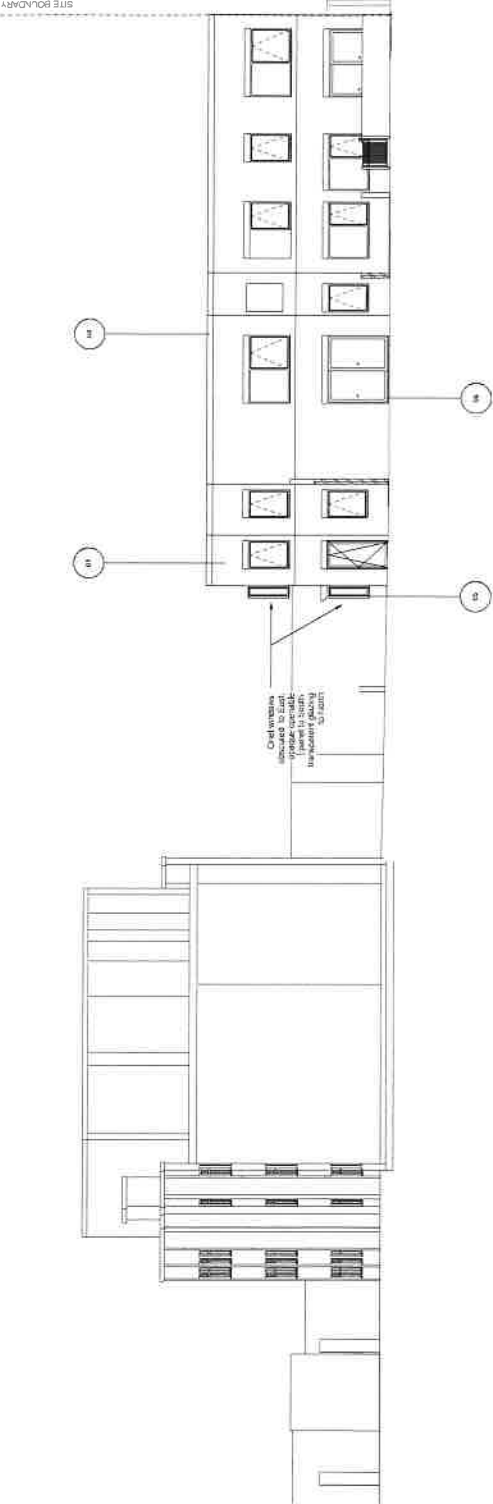
This drawing is for informational purposes only. It is not to be used for construction without the approval of the architect.



**PROJECT**  
Ellington Court  
**WORK**  
Proposed North  
Elevation

SCALE: 1:100 @ A1  
REV: P04  
DRAWING NUMBER: ELC-LGA-00-XX-DR-A-0702

**PLANNING**



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starts.  
This drawing is to be read and checked in conjunction  
with all other drawings and specifications provided by the engineer and other  
specialists.

REV	DATE	DESCRIPTION	BY
P01	12-05-20	Revised to include 2 Storey	AB
P02	01-08-21	Updated to plan 20	GR
P03	04-02-21	Updated to plan 20	GR
P04	11-22-21	Final 3D view architectural	GR
P05	04-05-22	Final 3D view architectural	GR

ACT PLAN

**NOTES**

- 01. Refer to the site plan for the location of the building.
- 02. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 03. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 04. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 05. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 06. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 07. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 08. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 09. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.
- 10. The building is to be constructed in accordance with the Town of Lyndon Zoning By-law.

0 1 2 5m  
Scale (1:100)

**PROJECT**  
Ellington Court  
**DRAWING**  
Proposed North  
Elevation

SCALE	REV
1:100 @ A1	P05
<b>DRAWING NUMBER</b> ELC- LGA- 00- XX- DR- A- 0702	
<b>DRAWING STATUS</b> PLANNING	





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and confirm that all work is in accordance with  
sewer flow through all connections for the work  
shown. This drawing is to be used in accordance with  
the information provided by the engineer and other  
discussions.

REV.	DATE	DESCRIPTION
P01	03/05/2019	Issue for Planning
P02	04/05/2019	Issue for Planning
P03	10/05/2019	Update to plan
P04	03/05/2020	Final for planning

KEY PLAN



**NOTES**

1. All work to be in accordance with the Building Regulations.
2. All work to be in accordance with the Local Authority requirements.
3. All work to be in accordance with the Planning requirements.
4. All work to be in accordance with the Environmental Health requirements.
5. All work to be in accordance with the Fire Safety requirements.
6. All work to be in accordance with the Health and Safety requirements.
7. All work to be in accordance with the Access to Work requirements.
8. All work to be in accordance with the Equality Act requirements.
9. All work to be in accordance with the Data Protection Act requirements.
10. All work to be in accordance with the Freedom of Information Act requirements.
11. All work to be in accordance with the Environmental Protection Act requirements.
12. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) Act requirements.
13. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) Regulations requirements.
14. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) (Amendment) Regulations requirements.
15. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) (Amendment) (No. 2) Regulations requirements.
16. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) (Amendment) (No. 3) Regulations requirements.
17. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) (Amendment) (No. 4) Regulations requirements.
18. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) (Amendment) (No. 5) Regulations requirements.
19. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) (Amendment) (No. 6) Regulations requirements.
20. All work to be in accordance with the Planning (Listed Buildings and Conservation Areas) (Amendment) (No. 7) Regulations requirements.

Notes to be removed in accordance with the Planning requirements and other requirements to be added as appropriate.



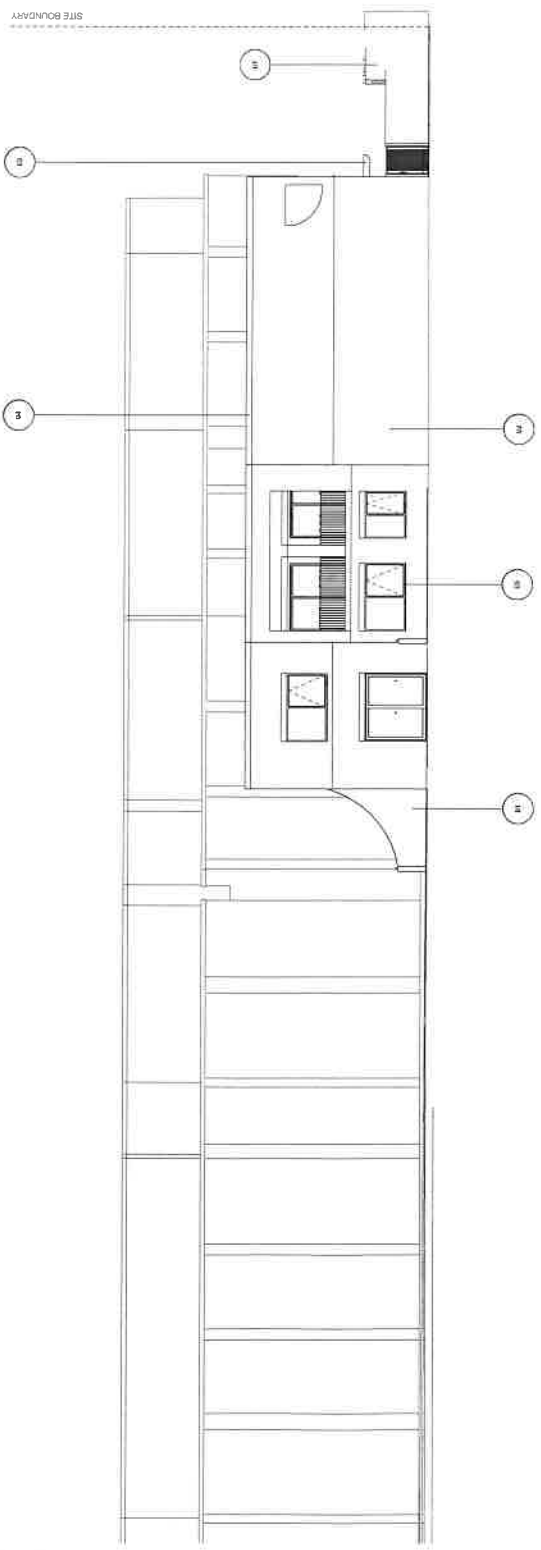
PROJECT  
**Ellington Court**

PROPOSED  
**West Elevation**

SCALE	REV
1:100 @ A1	P04

DRAWING NUMBER  
**ELC-LGA-00-XX-DR-A-0703**

DISCIPLINE  
**PLANNING**



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as a contract. It is subject to change without notice.  
Approved:

REV	DATE	DESCRIPTION	BY
P01	02/25/20	Issued for Stage 2 Review	AG
P02	04/02/21	Updated to permit	CR
P03	04/02/21	Comments	CR
P04	04/02/21	Final	AG
P05	02/22/23	Final to site engineer	CR

KEY PLAN

**PLANTING NOTES**

- 1. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 2. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 3. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 4. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 5. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 6. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 7. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 8. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 9. All trees to be planted in accordance with the Tree Replacement Ordinance.
- 10. All trees to be planted in accordance with the Tree Replacement Ordinance.

Tree to be removed in accordance with the Tree Replacement Ordinance. All trees to be removed shall be replaced with trees of equal or greater size and species.

Scale: 1" = 10'-0"

**PROJECT**  
Ellington Court  
**DRAWING**  
Proposed West Elevation

SCALE: 1:100 @ A1  
DATE: P05  
DRAWING NUMBER: ELC-LGA-00-XX-DR-A-0703

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consultants.

REV. DATE. DESCRIPTION

1/01/2020 Initial Design Review

NO. 1 (A3)

1/01/2020



PROJECT

Ellington Court

DRAWING

Existing Location Plan

SCALE

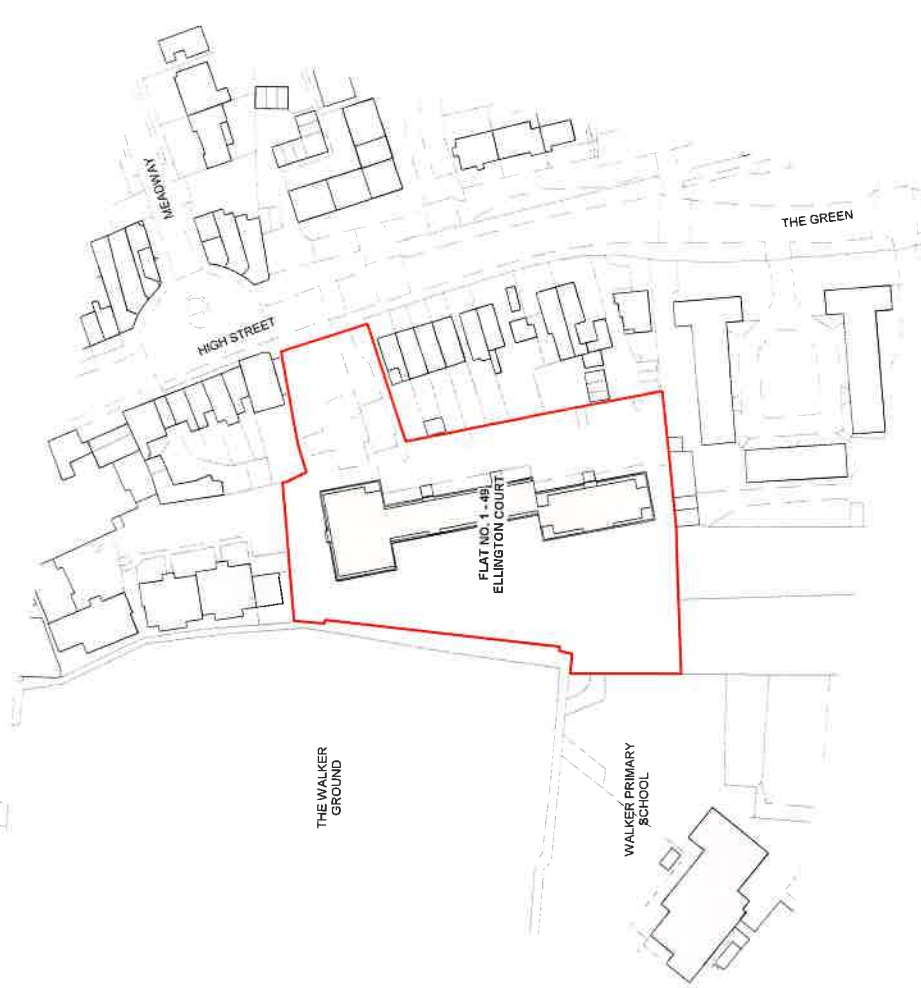
1 : 1250 at A3 P01

DRAWING NUMBER

ELC-LGA-00-XX-DR-A-0100

DRAWING TITLE

PLANNING



**1 Existing Location Plan**  
Scale: 1:1250

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REV	DATE	DESCRIPTION	BY
P01	2/20/20	Final For Review / Permitted	AG
P02	4/20/20	Revised For Planning	CR
P03	2/20/21	Revised For Review	CR
P04	04/20/21	Construction Documents	CR

KEY PLAN

INFORMATION

- Key
- In Progress
- To Be Done
- To Be Deleted
- Construction Items
- Project Limits



PROJECT  
**Ellington Court**

DRAWING  
**Proposed First Floor  
 Plan**

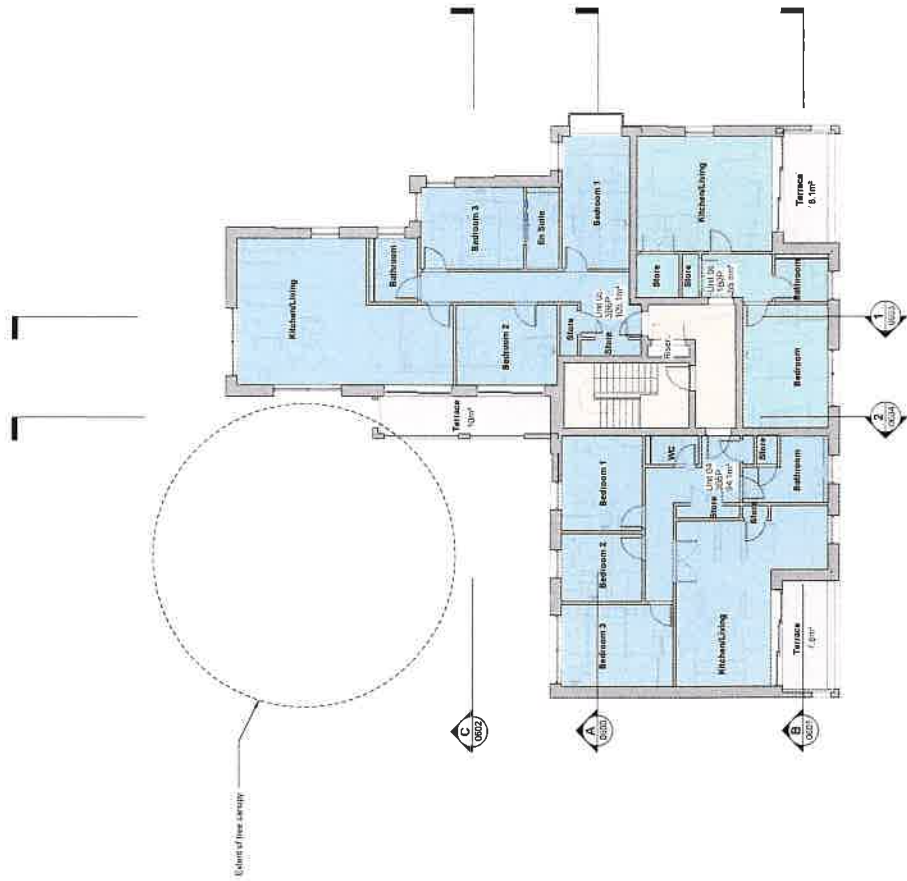
SCALE  
**1" = 100' at A1**

REV  
**P04**

DRAWING NUMBER  
**ELC-LGA-00-01-DR-A-0201**

STANDARD NOTES  
**FOR INFORMATION**

EXISTING  
 FLAT NO. 11-48  
 ELLINGTON COURT



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specification for any additional work not shown on this drawing.

REV	DATE	DESCRIPTION
001	12/01/13	Issue for Client Review
002	02/04/13	Issue for Planning

KEY PLAN

INFORMATION



PROJECT  
**Ellington Court**

DRAWING  
**Proposed Roof Plan**

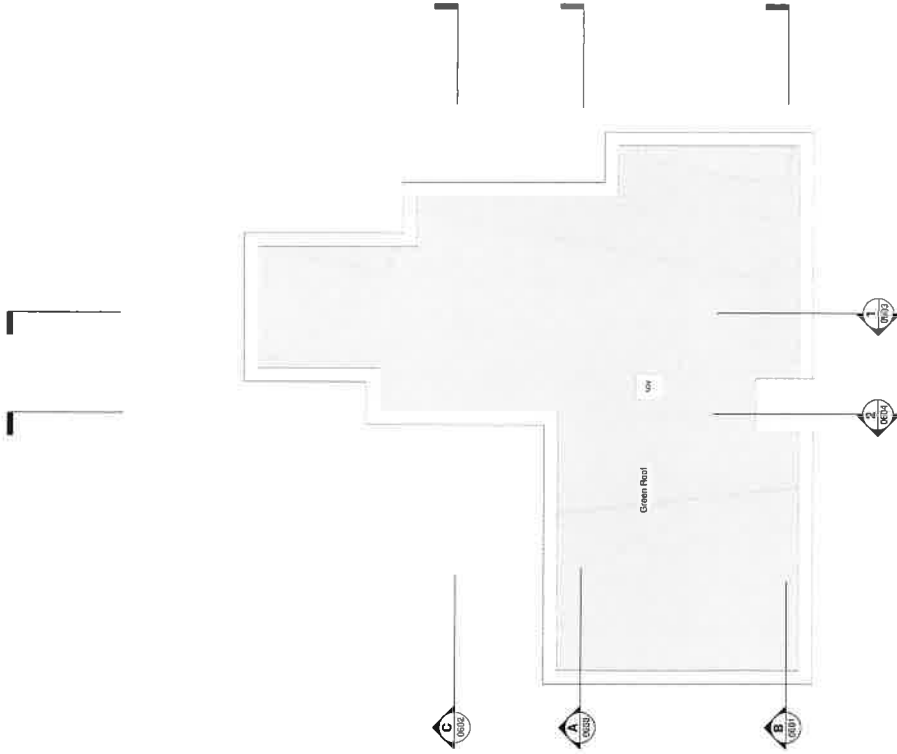
SCALE  
**1 : 100 at A1**

REV  
**P02**

CLIENT  
**ELC - LGA- 00- DR- A- 0203**

DISCIPLINE  
**PLANNING**

EXISTING  
FLAT NO. 1-48  
ELLINGTON COURT



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professionals.

REV	DATE	DESCRIPTION
001	12/08/18	Issue for Planning
002	12/08/18	Issue for Planning

KEY PLAN

REVISION



PROJECT	Ellington Court
DRAWING	Proposed Site Plan
SCALE	1 : 500 at A3 P02
DRAWING NUMBER	ELC-LGA-00-XX-DR-A-0102
DISCIPLINE	PLANNING



**1 Proposed Site Plan**  
Scale: 1:500

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with the project by the engineer and other  
specialists.

REV	DATE	DESCRIPTION
01	04/02/2018	Issue for Stage 2 Review
02	04/02/2018	Approved to Proceed
03	04/02/2018	Approved to Proceed

KEY PLAN

Open windows located  
in this elevation opposite  
the proposed parking lot  
North

SITE BOUNDARY

INFORMATION

SYMBOL	DESCRIPTION
01	Open windows located in this elevation opposite the proposed parking lot North
02	Open windows located in this elevation opposite the proposed parking lot North
03	Open windows located in this elevation opposite the proposed parking lot North
04	Open windows located in this elevation opposite the proposed parking lot North
05	Open windows located in this elevation opposite the proposed parking lot North
06	Open windows located in this elevation opposite the proposed parking lot North
07	Open windows located in this elevation opposite the proposed parking lot North
08	Open windows located in this elevation opposite the proposed parking lot North
09	Open windows located in this elevation opposite the proposed parking lot North
10	Open windows located in this elevation opposite the proposed parking lot North

0 1 2 5m  
Scale (1:100)

**Ellington Court  
Proposed East Elevation**

SCALE 1:100 @ A1  
REV. P02  
DRAWING NUMBER ELC-LGA-00-XX-DR-A-0701

DRAWING STATUS  
**FOR INFORMATION**



- KEY:**
- PROPOSED TREE PLANTING
  - PROPOSED DECORATIVE SHRUB PLANTING
  - PROPOSED NATIVE HEDGE
  - PROPOSED AREA OF GRASS
  - PROPOSED RESIN BOUND GRAVEL  
Product: Butterscotch  
Supplier: Sunset  
Finish: 3mm
  - PROPOSED RESIN BOUND GRAVEL  
Product: Barley Butter  
Supplier: Sunset  
Finish: 3mm
  - PROPOSED CONCRETE PAVING TO REAR GARDENS  
Product: Standard Flags  
Supplier: Tobermore  
Colour: Buff  
Size: 400x400x40mm
  - PROPOSED PLAY AREA  
Play Area to be finished in a Wet Pour Surface surrounded by Bow Top Railings
  - PROPOSED MACADAM  
Proposed macadam to road surface
  - PROPOSED GRAVEL EDGE  
3-6mm Gravel to the edges of the building edged with a laminated timber edge
  - PROPOSED TIMBER BENCH  
Product: Type 2 Barkless Bench  
Supplier: Woodscape  
Size: 2500mm length
  - PROPOSED MODULAR SEATING  
To Axiolux Specification
  - EXISTING VEGETATION  
To be retained
  - EXISTING TREES  
To be retained
  - EXISTING TREES  
To be removed
  - PROPOSED SHRUB PLANTING AREAS
  - PROPOSED CLIMBING PLANT

DRAFT I

**PLANT SCHEDULE**

TREES	Species	Number	Height/Girth	Specification	Density
AME LAM	American Larkspur	13	1.5-2m	CG	AS DWG
BEY IQD	Betula villosa var. jacquemontii	1	2-2.5m	RB	AS DWG
BEY PEM	Betula pendula	3	12-14cm	WB	AS DWG
CAR BET	Carpinus betulus	3	12-14cm	RB	AS DWG
PRU AVI	Prunus avium	7	12-14cm	RB	AS DWG
PRU CER	Prunus cerasifera	4	12-14cm	RB	AS DWG
SON AUC	Sorbus aucuparia	4	12-14cm	RB	AS DWG
SYR VUL	Syringa vulgaris	2	1.5-2m	CG	AS DWG

SHRUBS	Species	Number	Height/Girth	Specification	Density
AUC VAR	Aucuba japonica 'Variegata'	258	5L	CG	3/m2
BER PUR	Berberis purpurascens	367	5L	CG	4/m2
CEA REP	Ceanothus 'Repens'	347	5L	CG	4/m2
CHO AZE	Chamaecyparis 'Azura'	193	5L	CG	4/m2
CHO ILLI	Chamaecyparis 'Illinoensis'	149	5L	CG	4/m2
COB ALB	Cornus alba	309	5L	CG	4/m2
EUD AUR	Eumyrtus 'Aurea'	230	5L	CG	4/m2
EUD GOL	Eumyrtus 'Emerald and Gold'	90	5L	CG	4/m2
HEB MIE	Hebe 'Mistral'	254	5L	CG	4/m2
HEB RAK	Hebe rakaiensis	34	5L	CG	4/m2
HPH HID	Hypericum 'Hidcote'	20	5L	CG	4/m2
PHO IES	Phormium 'Iesop'	4	10L	CG	AS DWG
RUS CAN	Rosa canina	78	5L	CG	4/m2
RUS AUC	Ruscus aculeatus	105	5L	CG	4/m2
SAM NEG	Sambucus nigra	101	5L	CG	4/m2
SPY GOL	Spiraea japonica 'Goldflame'	73	5L	CG	4/m2
VIB DAV	Viburnum davidii	263	5L	CG	4/m2

HEDGES	Species	Number	Height/Girth	Specification	Density
ACE CAM	Acer campestre	106	90-120cm	BR	7/linear m
CAR BET	Carpinus betulus	106	90-120cm	BR	7/linear m
COA MON	Cotoneaster monogramma	106	90-120cm	BR	7/linear m
LEG VUL	Ligustrum vulgare	106	90-120cm	BR	7/linear m
ROS CAN	Rosa canina	106	90-120cm	BR	7/linear m
VIB CPU	Viburnum opulus	106	90-120cm	BR	7/linear m

Formal Hedges	Species	Number	Height/Girth	Specification	Density
BUX SEM	Buxus sempervirens	300	5L	CG	5/linear m

**OUTLINE SPECIFICATION**

**TREE PROTECTION**  
Existing trees and shrubs to be retained shall be protected in accordance with the current British Standard 'Trees in relation to construction' generally fencing shall be a 1.2m high chain-link or 1.8m timber fence secured and maintained in position for the duration of construction.

**GENERAL**  
All planting work is plants shall be in accordance with all approved current horticultural & British Standard specifications including 'Horticulture', 'Nursery Operations', 'Trees in relation to Design, Demolition & Construction', 'Tree Work' and the latest National Building Specification, National Plant Specification, National HFA Planning & Establishment Landscape Plants, Herbaceous, perennials and other ornamentals may only be used with the approval of the CA. Size of ornamentals shall be in accordance with all relevant guidelines and the manufacturer's recommendations. Imported soil shall be a minimum specification of General purpose grade unless otherwise indicated. 1.5m x approved compartmentalised material at least 20kg m<sup>2</sup> shall be substrate in situ before planting. Plant shall not be clad. Following planting all shrubs/beds shall be treated with an approved granular fertilizer at rates recommended by the manufacturer. All ornamental planting beds shall be mulched with 100mm depth maximum grade general purpose bark. All hedge and trees planting shall be mulched with 75mm depth maximum grade.

**TOPSOIL**  
Existing topsoil should be stripped before building work begins. Imported topsoil shall be a minimum specification to current British Standard 1400 purpose grade from an approved source in accordance to the above specification unless otherwise indicated. 1.5m x approved compost/organic material at least 20kg m<sup>2</sup> shall be cultivated into topsoil before planting. 'Peat' shall not be used.

**MAINTENANCE**  
The areas locally owned for planting shall be 72 months from completion of the work, to the current British Standard. During this period any plant which is found to be dead, dying or otherwise defective shall be replaced at the expense of the contractor during the next planting season. The contractor shall make maintenance visits as required to ensure the successful establishment of the planting and maintain all work areas in a neat and tidy condition. Regular visits (minimum 6 per year) required to maintain all planted areas in a weed and tree free condition using a combination of chemical spray and hand weeding to be agreed with the CA. Maintenance to include watering, pruning, soil and mulch top control and monitoring as required to current British Standard. Final visit to be immediately prior to handing over and to include a final care treatment of 20kg N 20 20 at 100mm<sup>2</sup> and 25mm beam bark mulch top to all ornamental planted area. Annual grass mowing at 50mm max VMS during growing season. Reseeding grass maintained in accordance with used supplier's recommendation. Maintenance to be carried out in years 2-6 to be agreed.

**PLANT SCHEDULE**  
Trees - Trees planted into tree pits 75mm deeper than the root system and wide enough to accommodate roots when fully spread. Root balled trees to be dug 500mm wider and same depth as the rootball. If the site is on an unconsolidated site or where clay soils could get waterlogged the tree pits should be 2-3 times the size of the rootball. Hedges - Planted into 450mm depth topsoil. Specimen Shrubs - Planted into 450mm depth topsoil. Ornamental Shrubs / Groundcovers - Planted into 450mm depth topsoil. Climbers - Planted into 450mm depth topsoil. Support to be provided as required. Grass area - 100mm depth topsoil.

**ALL TREES ARE TO BE PLANTED AS SHOWN ENSURING A MINIMUM OF 5 METRES FROM BUILDINGS AND 3 METRES FROM DRAINAGE. TREE PITS TO HAVE SUITABLE SOIL TO THE CURRENT BRITISH STANDARD TO A SUITABLE DEPTH, WITH PROTECTION DRAINAGE, ROOT PROTECTION, ANTI-RAT ROOT COPS AS REQUIRED TO SUIT GROUND CONDITIONS, AS APPROVED BY CA.**

**NB:** All to be British grown stock and fully hardened off. Root Dip - Proprietary Root Dip applied to all bare rooted stock (1) at time of lifting and nursery soil (2) prior to planting. Anti-Desiccant - Proprietary anti-desiccant to be applied to foliage of all containerised / root balled material in leaf specimen conifers and evergreen etc. (1) prior to transportation and (2) during any delay in planting. Pruning - Allow for pruning of all deciduous trees and shrubs by 15th of following planting at Landscape Architects instruction or as indicated in the planting schedule. Tree stakes and tree ties to be pressure treated, round smooth and padded (not chestnut) not less than 100mm in diameter. Advanced nursery stock - double staked with cross bar.

Rev C: 08/03/2018 (amended) enplan  
 Rev B: 11/02/2018 (update with new loadings) enplan  
 Rev A: 21/11/2018 (update for tender basket) enplan  
 revision / date / description / drawn

enplan  
 08/03/2018  
 T: 01800 32701  
 W: www.enplan.co.uk

Client: enplan  
 Brooks Murray Architects  
 Project: 1,250 @ A1  
 Ellington Court, Southgate  
 London, N14 6LB  
 08/03/2018

Title: enplan  
 Detailed Soft  
 Landscape Proposals  
 20/04/2018  
 06-807-701  
 Revision: RH  
 C



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REV.	DATE	DESCRIPTION	BY	CHK
PH	2/26/2018	Issued for Stage 2 Review	AG	AG
PR	03/08/2018	Issued for Planning	AG	AG
PS	04/20/2018	Issued for printing	AG	AG

REF PLAN

DATE PLOTTED: 4/24/18

**NOTIFICATION**

- 01. This drawing is for informational purposes only. It is not to be used for construction.
- 02. All dimensions shall be in feet and inches.
- 03. Dimensions are to center lines unless otherwise noted.
- 04. Dimensions are to the face of the wall unless otherwise noted.
- 05. Dimensions are to the center of the window unless otherwise noted.
- 06. Dimensions are to the center of the door unless otherwise noted.
- 07. Dimensions are to the center of the column unless otherwise noted.
- 08. Dimensions are to the center of the wall unless otherwise noted.
- 09. Dimensions are to the center of the wall unless otherwise noted.
- 10. Dimensions are to the center of the wall unless otherwise noted.

0 1 2 3ft  
Scale: 1" = 3'-0"

**ELLINGTON COURT  
Proposed South  
Elevation**

SCALE: 1:100 @ A1  
PROJECT: ELLINGTON COURT  
DRAWING NUMBER: ELC-LGA-00-XX-DR-A-0700

**FOR INFORMATION**





<b>LONDON BOROUGH OF ENFIELD</b>		
<b>PLANNING COMMITTEE</b>	<b>Date: 18 July 2023</b>	
<b>Report of</b>  Director of Planning & Growth - Brett Leahy	<b>Contact Officers:</b>  Lap Pan Chong Sharon Davidson	<b>Category</b> Major
<b>Ward</b> Ponders End	<b>Councillor Request</b> No	
<b>LOCATION:</b> Heritage House 345 Southbury Road Enfield EN1 1TW		
<b>APPLICATION NUMBER:</b> 23/00824/FUL		
<b>PROPOSAL:</b> Full planning application for the demolition of the existing buildings and redevelopment for a multi-level logistics building (Use Classes E(g)(iii), B2 and B8) capable of subdivision and commercial, business and service buildings (Use Classes E, B2 and B8) including boundary treatment, landscaping, car parking, servicing, public realm and associated works		
<b>Applicant Name &amp; Address:</b> c/o Agent BL Logistics Investment Limited York House 45 Seymour Street London W1H 7LX	<b>Agent Name &amp; Address:</b> Mr James Sheppard CBRE Limited Henrietta House Henrietta Place London W1G 0NB	
<b>RECOMMENDATION:</b>		
1) That subject to the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions		
2) That the Head of Development Management be granted delegated authority to agree the final wording of the Section 106 Agreement and the conditions to cover the matters in the Recommendation section of this report		

Ref: 23/00824/FUL LOCATION: Heritage House, 345 Southbury Road, Enfield, EN1 1TW



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Scale 1:1250

North



## 1. Note for Members

- 1.1 This planning application is categorised as a 'major' planning application involving development carried out on a site having an area of 1 hectare or more. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

## 2. Executive Summary

- 2.2. The proposed development includes a multi-level logistics building and commercial, business and service buildings, which would provide modern, flexible and high-quality employment floorspaces on existing brownfield land within the Great Cambridge Road and Martinbridge Trading Estate, a designated Strategic Industrial Location (SIL). The proposed development is the first industrial/logistics intensification scheme in Enfield.
- 2.3. The primary public benefits of the scheme can be summarised as follows:
- Optimising the site and making effective use of a highly sustainable, highly accessible, brownfield site next to Southbury Station;
  - Providing 42,426 sqm GIA , making a contribution to the Borough's employment floor spaces with a broad range of unit sizes and types including 2 x larger multi-level industrial and logistics units and 5 x smaller commercial units (2,040 sqm GIA)
  - Creating estimated 1,429 (657 direct and 772 indirect) construction jobs and estimated additional 373-386 Full-Time Equivalent (FTE) operational jobs
  - Repairing the streetscape along Southbury Road and contributing towards the delivery of a new public square outside Southbury Station including public art
  - Dedication of land and financial contribution for improving walking and cycling infrastructure in the locality
  - Substantial landscape and biodiversity enhancements including 193 new trees, 718m of native hedgerow, green walls and green roofs, achieving an Urban Greening Factor of 0.22 and Biodiversity Net Gain of 442.65% (area based) and 100% (linear based)
  - A substantial improvement to on-site sustainable urban drainage achieving greenfield run-off rate
- 2.4. Whilst the proposed Main Logistics Building is considered as a 'tall building' within the immediate setting of the Grade II listed 'Ripaults Factory' and Locally Listed Southbury Station, the massing and layout of all the proposed buildings have been sensitively designed particularly through the incorporation of lower C commercial, Business and Service (CBS) buildings fronting Southbury Road and high quality materials and detailed façade treatment of the buildings. The proposed development would also deliver substantial public realm and landscape improvements to Southbury Road including a new station square and new tree-lined frontage. A robust Built Heritage, Townscape and Visual Impact Appraisal has been undertaken to demonstrate no adverse impact on the mid-range and long range views from the heritage assets further afield and from Important Local Views in Enfield. Having taken into account the aforementioned heritage benefits and mitigation, , it is, on balance, considered that the proposed development would not cause harm to the heritage assets and the townscape.
- 2.5. The proposed scheme would result in some adverse and noticeable reductions in daylight to some residential properties on Poppy Drive. However, consideration should be given to the particular design characteristics and internal layouts of these residential

properties, to the fairly minimal existing massing on the Application site, which is unusual in an urban context, and to the SIL designation of the Application Site where industrial intensification is supported by the London Plan 2021. It is also reasonable to consider the identified effects alongside the planning merits of the scheme overall. The proposal would not result in adverse impact on the sunlight and overshadowing to any of the surrounding properties. In conclusion, Officers consider that when balancing the overall minor adverse impact of the scheme in terms of daylight, sunlight and overshadowing with the many planning benefits that the scheme would deliver, the overall balance weighs in favour of the proposal.

- 2.6. Furthermore, it has been recognised that:
- The proposals would not cause any unacceptable adverse impacts to highway safety or the flow of traffic in the locality.
  - The proposals would not result in an unacceptable level of noise and light spill to the residential properties nearby.
  - The proposed development would achieve 'Net Zero' operational carbon primarily through on-site measures (97% reduction above the baseline) and a contribution to a carbon offset fund. The benchmark target for whole life carbon emissions would be met. Construction and operational waste have been minimised. The proposed buildings will achieve a minimum BREEAM 'Excellent' rating.
- 2.7. The development would be appropriate and broadly in accordance with the Development Plan ( London Plan 2021, Core Strategy and Development Management policies) and relevant National Planning Policy Framework 2021 (NPPF) policies.

### 3. Recommendation

- 3.1. That subject to the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions
- 3.2. That delegated authority be granted to the the Head of Development Management to agree the final wording of the Section 106 Agreement and the conditions to cover the matters in the Recommendation section of this report.
- 3.3. Conditions
1. Time limit
  2. Approved plans
  3. Phasing Plan
  4. Completion of CBS units prior to the first occupation of the development
  5. Detailed drawings and sample materials
  6. Arboricultural Methods Statement
  7. Landscape and biodiversity enhancement details (including external lighting, boundary treatments, green roofs, green wall, amenity spaces, public realm and management plan)
  8. Final sustainable drainage strategy
  9. Drainage strategy verification report
  10. Circular economy including compliance to Circular Economy Statement, Excess Materials Exchange and post-construction monitoring report
  11. Heating system details for the CBS buildings
  12. Compliance to Energy Statement and energy performance certificates

13. Compliance to whole life carbon assessment and post-construction monitoring report
14. BREEAM assessment (design stage and post-construction)
15. Final Construction Logistic Plan
16. EV charging details
17. Cycle parking details
18. Final car park management plan
19. Delivery and servicing plan
20. Piling statement
21. Land contamination remediation scheme
22. Plant noise impact assessment
23. CCTV details
24. 'Secured by Design' certification
25. No construction within 5m of water main
26. Full fibre connectivity
27. Tree / shrub Clearance – Nesting Birds
28. Phased clearance – reptiles
29. Compliance to Fire statement
30. Compliance to operational waste strategy
31. Compliance to overheating mitigation measures
32. Compliance to water efficiency measures
33. Compliance to dust control measures
34. Compliance to Outline Construction Environmental Management Plan
35. Compliance to the Health Impact Assessment
36. ECO stars fleet recognition scheme
37. Completion of refuge island and tactile paving in the main access prior to occupation
38. Emissions from non-road mobile machinery
39. Permitted Development Rights to ensure SIL compatible uses in the CBS buildings

#### **4. Site & Surroundings**

- 4.1 The planning application boundary covers an area of 4.67 HA.
- 4.2 The Site is within the Great Cambridge Road and Martinbridge Trading Estate which is a designated Strategic Industrial Location (SIL). The building is currently operating as a distribution centre for Waitrose and Crown Records Management with a large warehouse building and associated offices (approximately GIA of 20,306 sqm) and 315 parking spaces.
- 4.3 The Site is located within the setting of the Grade II Listed Ripaults Factory which is located north of the site on the opposite (northern) side of Southbury Road and the Locally Listed Southbury Station which is located north-east of the Site.
- 4.4 To the east of the Site, there are landscaped banks which are non-statutory designated Wildlife Corridors. On the opposite (eastern) side of the Overground railway line, the neighbouring buildings are predominantly three storey residential properties on Poppy Drive and Emelia Close backing onto the eastern platform.
- 4.5 To the west of the Site, the majority of the buildings are commercial with several retail units.

- 4.6 To the south of the Site, Haslemere Business Centre comprises several logistics buildings which are all of medium height with tall trees screening along with boundaries with the residential properties located on Lincoln Way further south of the Site. Heritage assets further afield were scoped out as they are not affected by the development.
- 4.7 The Site is currently accessed off Southbury Road which runs along the northern edge of the site. The site is approximately 330 metres from the A10, Great Cambridge Road which forms the Transport for London Road Network (TLRN).
- 4.8 The Site is serviced by the London Overground which is adjacent to the north-east part of the Site . There is a bus stop outside of the site located on Southbury Road which services a number of routes. Cycleway 1 is approximately 450 metres to the east of the site. There is also a Cycleway that runs through Enfield Fields approximately 750 metres west of the site. Due to the aforementioned transport connections the site has a Public Transport Access Level (PTAL) of both 3 and 4 on a scale from 0 to 6b where 0 is the lowest and 6b is the highest.



Figure 1: Aerial photo of the site

## 5. Proposal

- 5.1 It is proposed to demolish the existing building and provide a multi-level logistics building (Use Classes E(g)(iii), B2 and B8) over two storeys and separate commercial, business and service buildings (Blocks A-E) (Use Classes E, B2 and B8) with boundary treatment, landscaping, car parking, servicing, public realm and associated works. The summary of the land uses is illustrated in Table 1 below.

Table 1 Proposed Land Uses

Building		Floor	Proposed use	Use Class	GIA (sqm)
Main Logistic Building	Unit 1	Ground Floor	Industrial and logistics uses with	E(g)(iii), B2 and B8	18,165
		Ground Floor Mezzanine			1,916



	Unit 2	First Floor	ancillary offices on mezzanine floors		18,134	
		First Floor Mezzanine				1,916
		Roof plant				255
Sub-total					40,386	
Commercial, Business and Service Buildings	A	Ground Floor	A broad range of employment uses	E, B2 and B8	243	
		Mezzanine			204	
	B	Ground Floor			207	
		Mezzanine			164	
	C	Ground Floor			243	
		Mezzanine			204	
	D	Ground Floor			221	
		Mezzanine			172	
	E	Ground Floor			221	
		Mezzanine			161	
Sub-total					2,040	
Total area					42,426	

#### Main multi-level logistics building

- 5.2 The main multi-level logistics building would accommodate two large logistics units and deliver a total of 42,426 sqm GIA of floorspace at both ground and first floors including 3,832 sqm ancillary offices on mezzanine floors. It will have a maximum height of 29.6m / 51.45 AOD from ground to the core parapet level (roof access cores). Separate entrances are provided for each unit, which are located at the north-east corner of the building.
- 5.3 The existing main vehicular access will be widened with a new refuge island in the middle and tactile paving on each sides of the crossing.
- 5.4 The units will be serviced by their own dedicated service yard which will be located at the rear of building. A ramp is proposed along the western site boundary to serve the first floor service yard.

#### Commercial Business Service Buildings

- 5.1 The Commercial, Business and Service (CBS) buildings with mezzanine floors will accommodate 5 commercial units with a total 2,040 sqm GIA. They will front Southbury Road with a level access from the street. Their heights range from 10.25 m (33.65m AOD) to 8.6m (32.00m AOD). Service/loading bays will be provided at the rear for these proposed CBS buildings.

#### Parking

- 5.2 A total of 145 car parking spaces including 8 car sharing priority spaces and 15 accessible car parking spaces are proposed. The majority of the car parking spaces are located in the rear / southern part of the Site. There will be a 3m wide north-south path connecting the main car park area with the entrances of the buildings. The accessible car parking spaces will be located between the main logistics building and CBS buildings, which will be closer to the entrances.

5.3 A total of 52 van spaces will be provided including 26 spaces near the service yard of the ground floor large logistics unit, and 20 spaces within the main car park and 6 spaces at the rear of CBS Block.

5.4 The proposed development will provide a total of 133 long stay and 60 short stay bicycle parking spaces.

## **6. Environmental Review**

6.1 A request for an Environmental Impact Assessment (EIA) Screening Opinion was made by CBRE on behalf of the Applicant (BL Logistics Investment Limited) in accordance with Part 2, Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council has commissioned an external EIA/Ecology consultant Pell Frischmann to review the screening request and provide advice. Officers agreed that [given the scale and nature of the proposed development, the environmental context of the site and the potential mitigation measures (which will assist in avoiding any significant effects)], the proposed development, when assessed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and National Planning Practice Guidance, would not result in any unusually complex, significant or potentially hazardous environmental effects. As such it is considered that the proposed development does not require an Environmental Impact Assessment. On this basis, the Council previously issued two formal screening opinions reference 22/03587/SO and 23/00488/SO.

6.2 The Council as a Competent Authority has also commissioned Pell Frischmann to undertake a Habitats Regulations Assessment (HRA) Stage 1 Screening in order to assess the impacts of proposed development on the Epping Forest Special Area of Conservation (SAC). All associated HGV trips from the proposed development are anticipated to travel west from the site, away from Epping Forest SAC. Natural England have reviewed the HRA Screening Report and confirmed it is not necessary to progress to Stage 2: Appropriate Assessment during the EIA screening consultation (ref: 23/00488/SO) . . Following consideration of the information submitted and the response received from Natural England, the Council is satisfied that the proposed development is not likely to have a significant effect on any European site (either alone or in combination with other plans or projects) and that an appropriate assessment is therefore not required.

6.3 On the basis of the assessments undertaken, the proposed development would not give rise to significant effects on the environment subject to appropriate mitigation measures such that it would trigger the requirement for an Environmental Impact Assessment having regard to the above Regulations, National Planning Practice Guidance and relevant case law. Also, as a competent authority, the Council is satisfied that the proposed development is not likely to have a significant effect on any European site. The required mitigation measures will be secured in connection with any grant of planning permission, via the planning conditions or the section 106 obligations. They are detailed in the relevant sections below.

## **7. Consultation**

### Pre-application Consultation

*Public engagement*

- 7.1 The Applicant presented the proposed development to Cllr Nicki Adeleke, Ponders End Ward Councillor and Cllr Susan Erbil, Cabinet Member for Licensing, Planning & Regulatory Services on 14 November 2022.
- 7.2 The Applicant also sent consultation flyers to local residents and businesses, created a development website, which has and continues to be periodically updated, and has also held a series of community consultation events on 9 and 12 November 2022.
- 7.3 The Statement of Community Engagement report prepared by Concillio has been submitted as part of the application.
- 7.4 The Applicant has provided a summary of the comments received and responses in Table 4 of the submitted Planning Statement. Overall, the principle of development together with the public realm improvement along Southbury Road and the Station are in general supported. Some concerns were raised around the impacts on the neighbouring residents amenity and increase in traffic. To address these concerns, some key changes to the proposed development have been made including reducing the building height of the main logistics building by 3m, relocating the office spaces to the north elevation of the main logistics building to offer more privacy to the neighbours to the east, and enhancing the greenery with additional trees along Southbury Road and the eastern site boundary. The Transportation Team, TFL and National Highways have reviewed the submitted Transport Assessment and confirmed the proposed development would not result in any adverse impacts on the highway networks in the area. The aforementioned matters are further discussed in the 'Neighbouring Residential Amenity' and 'Traffic, Access and Parking' sections of this report.

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

- 7.5 During the pre-application stage, the proposed development was brought to the Enfield Place and Design Quality Panel (hereby referred to as DRP) on 10 November 2022 and 26 January 2023.
- 7.6 The Panel are satisfied that the proposed scheme has responded positively to the comments made at the first meeting. The Panel considers the proposals integrate the site satisfactorily with its context. The impact of the massing and dominance of vehicles when viewed from Southbury Road are greatly reduced by the introduction of smaller scale units fronting Southbury Road. The boundary treatment to the site in general has been further refined with the consideration of the proposed north-south route and enhancements to soft landscaping along the eastern edge.
- 7.7 Other detailed suggestions from the Panel have been also incorporated in the latest submitted scheme. Where the suggestions are not taken, sound justifications have been provided and are addressed in the report.

Statutory and Non-Statutory Consultees

*External*

7.8 *Barnet Council*: No objection

*Energetik*:

7.9 No objection to the proposal subject to provisions to enable future connection of District Heat Network.

Officer comment: The S106 obligation identified is recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Operational Carbon Emissions' section of this report.

7.10 *Enfield Disablement Association*: No comment received.

*GLA*:

7.11 **Land use principles**: The proposed land uses are in line with London Plan requirements and are supported.

**Urban Design and heritage**: The site is not identified as being suitable for a tall building and therefore the application does not comply with Policy D9(B), Notwithstanding this the proposal would not have any unacceptable visual, functional, environmental or cumulative impacts on its surroundings and will not harm the setting or significance of nearby heritage assets. As such a building of the proposed height on this site does not raise any strategic concerns.

**Transport**: With regards to Healthy Streets it is recommended that infrastructure and maintenance improvements are secured by the Council to encourage walking and ensure pedestrian safety. Conditions may be necessary to protect the adjacent railway infrastructure. The quantum of staff parking should be reviewed. Management plans need to be secured.

**Environment and Sustainability**: Subject to securing appropriate energy and WLC conditions along with mitigation measures for air-quality and flood risk, the proposal is not expected to result in strategically significant issues regarding environment and sustainability

**Conclusion**: As the proposal raises no strategic planning issues, in this instance, there is no need for it to be referred back to the Mayor

Officer comment: The GLA comments have informed revisions to the Energy Statement, Whole Carbon Assessment, Circular Economy Statement and Fire Statement. The conditions identified in relation to energy, WLC, air quality, flood risk, and car parking management plan are recommended in the 'Recommendation' section above. Furthermore, the walking and cycling infrastructure improvements identified will be secured by a S106 obligation as stated in the 'S106 Heads of Terms' section below.

7.12 *Hertsmere Borough Council*: No objection

7.13 *Haringey Council*: No comment received.

*Historic England (GLAAS)*:

7.14 No objection. The proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or conditions are therefore necessary.

7.15 *Historic England*: No comment received.

7.16 *Lee Valley Regional Park Authority*: No comment received.

7.17 *London Fire Brigade*: London Fire Brigade did not comment

*Metropolitan Police (Secured by Design)*:

7.18 No objection subject to a final 'Secured by Design' certification, declaration of conformity of the proposed lighting details to BS 5489-1:2013/2020 and CCTV details.

Officer comment: The condition identified is recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Secure by Design' section of this report.

*National Highway*:

7.19 Satisfied that the proposal would not materially affect the safety, reliability, and/or operation of the strategic road network (SRN) (i.e. M25 J25)

7.20 *Natural England*: No comment received during the consultation of this application. During the EIA screening consultation (ref: 23/00488/SO), Natural England reviewed the HRA Screening Report prepared by the Council as a Competent Authority and confirmed it is not necessary to progress to Stage 2: Appropriate Assessment

*Network Rail*:

7.21 The ownership of the land for the proposed public realm work needs to be clarified. The Applicant should continue to engage with Network Rail's Asset Protection Team. Network Rail would welcome further discussion with the Applicant, Enfield Council and TfL to further improve the public realm between the proposed development and Southbury Station.

Officer comment: Based on the Council's internal GIS map, it appears that the concerned land is adopted highways. The matters raised are assessed in the 'Healthy Street/ Active Travel' section of this report.

7.22 *Ponders End Community Development Trust*: No comment received.

7.23 *Poppy Drive Residents Association* : No comment received.

*Thames Water Authority*:

7.24 No objection to foul water capacity nor surface water drainage strategy subject to compliance to drainage hierarchy and an informative about effective use of petrol / oil interceptors in all car parking/washing/repair facilities. A condition is recommended to request information about diversion of the strategic water main in case of any construction works within 5m of the water main.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Flood Risk and Drainage' section of this report.

- 7.25 *UK Power Networks:* No comment received.

*Internal*

- 7.26 *Building Control:* No objection to the submitted Fire Statement.

*Climate Action and Sustainability:*

- 7.27 No objection subject to conditions to increase re-use of the materials through the use of Excess Materials Exchange, post construction evidence of compliance with energy statement and S106 obligation for the carbon offset fund contribution.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above and a S106 obligation is recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Sustainable Design and Construction' section of this report.

*Heritage*

- 7.28 No objection subject to conditions. The proposal brings heritage benefits and an enhancement to the present condition of the setting of the Grade II listed Ripaults Factory and Locally Listed Southbury Station. Officers considered the smaller detached units at the front of the site will help to better define the streetscape whilst also providing a degree of screening for the larger massing together with a generous hard and soft landscaping scheme to Southbury Road and public art.
- 7.29 The Heritage Team recommended conditions for further details concerning the materials, landscaping and S106 obligation for public arts strategy. A compliance condition is also recommended to ensure the CBS buildings are completed prior to the Main Logistics Unit.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above and a S106 obligation is recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Heritage, Townscape and Archaeology' section of this report.

*Economic Development:*

- 7.30 No objection subject to employment and skill strategy to be secured via S106.

Officer comment: The S106 obligation identified is recommended in the 'S106 Heads of Terms' section below.

*Environmental Health:*

- 7.31 No objection subject to conditions for piling method statement, acoustic report on future mechanical plants, revised details of the boundary treatment on the first floor service yard, land contamination mitigation scheme, compliance to GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and

Demolition” and implementation of mitigation measures stated in the submitted Air Quality Assessment.

Officer comment: The conditions identified are recommended in the ‘Recommendation’ section above. The matters raised are assessed in the ‘Noise’, ‘Light spill’, ‘Air Quality’ and ‘Land Contamination’ sections of this report.

*Journeys and Places:*

- 7.32 Transportation Officers do not object to the application subject to Travel Plan monitoring and the Active Travel financial contributions.

Officer comment: The S106 obligations identified are recommended in the ‘S106 Heads of Terms’ section below. The matters raised are assessed in the ‘Traffic, Access and Parking’ section of this report.

*Sustainable Drainage:*

- 7.33 No objection subject to a condition to secure the final design and drainage verification report.

Officer comment: The conditions identified are recommended in the ‘Recommendation’ section above. The matters raised are assessed in the ‘Flood Risk and Drainage’ section of this report.

*Trees:*

- 7.34 The Street Tree Officer raises no objection to the application subject to an Arboricultural Method Statement and Tree Protection Plan.

Officer comment: The conditions identified are recommended in the ‘Recommendation’ section above. The matters raised are assessed in the ‘Tree’ section of this report.

Public

- 6.1 Consultation letters were sent to 985 surrounding properties on 24.03.2023
- 6.2 Site notices were put up on 03.04.2023. and the application was advertised in the local press on 29.03.2023
- 6.3 Two objections to this application were received. A summary of the comments received, and officers’ responses are as follows:

Summary of responses

- Noise nuisance during construction
- No information about the planned hours or timescales of work
- Dust and debris during construction
- Lighting pollution
- Loss of outlook from Nos 57 and 60 Poppy Drive

- Loss of light to Nos 57 and 60 Poppy Drive

Officers' response

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

Summary of responses

- No benefits to local residents and community
- Insufficient public consultation

Officers' response

The benefits have been set out in the executive summary of this report. The scheme has been revised several times, and has informed discussions with additional information provided in light of the concerns raised during the public consultation during pre-application.

Summary of responses

- Impact on property values

Officers' response

Impact on property value is not a material planning consideration.

## 8. Relevant Planning History

### Application Site

- 8.1 TP/94/0619 Redevelopment of site by the erection of warehouse building with ancillary office accommodation, together with provision of service yards, lorry parking and associated car parking spaces. Granted with condition – 10.11.1994

### Adjacent Sites

- 8.2 Colosseum Retail Park, Dearsley Road, Enfield EN1 3FD  
20/00788/OUT Hybrid Planning Application for the phased demolition of all existing buildings and structures, site preparation works and the comprehensive residential-led mixed use redevelopment of Colosseum Retail Park comprising: Detailed planning application for the construction of four buildings comprising residential dwellings (Use Class C3), flexible commercial floorspace including a Work Hub (Use Classes A1, A2, A3, A4, B1, D1 and/or D2), ancillary car/cycle parking, amenity, plant, all other associated public, communal and private realm, soft/hard landscaping, infrastructure, access and highway works, and any temporary landscaping, parking and access arrangements;

Outline planning application (with all matters reserved) for the construction of six development plots comprising residential floorspace (Use Class C3) including any ancillary internal parking, amenity, and plant; flexible commercial floorspace (Use Class A1, A2, A3, A4, B1, D1 and D2), and all other associated public, communal and private realm, soft/hard landscaping, infrastructure and highway works, access and a new internal road network **Granted with conditions and S106** – 30.07.2021



- 8.3 Lee House, Baird Road, Enfield, EN1 1SJ  
21/04573/FUL Full planning application was granted for redevelopment of an existing office into 4,738m<sup>2</sup> of flexible industrial/ logistics floorspace **Granted with conditions and S106**
- 8.4 Hereward House, 288 Southbury Road, Enfield, EN1 1TR  
22/03175/OUT Outline planning application for redevelopment to 7 storeys of residential block with first and ground floor commercial uses was submitted in September 2022. **Under consideration.**



Figure 2: Surrounding developments

(A: Colosseum Retail Park; B: Lee House, Baird Road C: 288 Southbury Road)

## 9. Relevant Planning Policies

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

### National Planning Policy Framework 2021

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

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

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

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

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

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

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

b) local market conditions and viability;

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

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

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

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

#### The London Plan 2021

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

GG1 – Building Strong and Inclusive Communities

- GG2 – Making the Best Use of Land
- GG3 – Creating a Healthy City
- D3 – Optimising Site Capacity through the Design-Led Approach
- D4 – Delivering Good Design
- D5 – Inclusive Design
- D11 – Safety, Security and Resilience to Emergency
- D12 – Fire Safety
- D14 – Noise
- E4 – Land for industry, logistics and services to support London’s economic function
- E5 – Strategic Industrial Locations (SIL)
- E7 – Industrial intensification, co-location and substitution
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions
- SI5 – Water Infrastructure
- SI12 – Flood Risk Management
- SI13 – Sustainable Drainage
- T1 – Strategic approach to transport
- T2 – Healthy Streets
- T3 – Transport capacity, connectivity and safeguarding
- T5 – Cycling
- T6 – Car Parking
- T7 – Deliveries, Servicing and Construction

Local Plan - Overview

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

Core Strategy

- 9.8 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 policies within the Core Strategy are considered particularly relevant:

- CP9: Supporting community cohesion
- CP13: Promoting economic prosperity
- CP14: Safeguarding strategic industrial locations
- CP20: Sustainable energy use and energy infrastructure
- CP21: Delivering sustainable water supply, drainage and sewerage infrastructure
- CP22: Delivering sustainable waste management
- CP24: The road network

CP25:	Pedestrians and cyclists
CP26:	Public transport
CP28:	Managing flood risk through development
CP30:	Maintaining and improving the quality of the built and open environment
CP31:	Built and landscape heritage
CP32:	Pollution
CP36:	Biodiversity
CP46:	Infrastructure contributions

#### Development Management Document

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

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

DMD19	Strategic Industrial Locations
DMD23	New Employment Development
DMD37	Achieving High Quality Design-Led Development
DMD38	Design Process
DMD39	The Design of Business Premises
DMD45	Parking Standards
DMD47	New Roads, Access and Servicing
DMD48	Transport Assessments
DMD49	Sustainable Design and Construction Statements
DMD50	Environmental Assessment Methods
DMD51	Energy Efficiency Standards
DMD53	Low and Zero Carbon Technology
DMD55	Use of Roof Space / Vertical Surfaces
DMD58	Water Efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD64	Pollution Control and Assessment
DMD65	Air Quality
DMD68	Noise
DMD69	Light Pollution
DMD70	Water Quality
DMD76	Wildlife Corridor
DMD79	Ecological Enhancements
DMD80	Trees on Development Sites
DMD81	Landscaping

#### Other Material Considerations

National Planning Practice Guidance  
Mayor of London Housing SPG (Adopted March 2016)  
LBE S106 SPD 2016  
TfL London Cycle Design Standards (2014)  
Energy Planning Guidance (2021)  
Be Seen Energy Monitoring LPG (2021)

Draft Fire Safety LPG (2022)  
Whole Life Carbon LPG (2022)  
Circular Economy Statements LPG (2022)  
Urban Greening Factor LPG (2023)  
Air quality positive LPG (2023)  
Air quality neutral LPG (2023)

Enfield S106 Supplementary Planning Document (Adopted November 2016)  
Enfield Decentralised Energy Network Technical Specification SPD (2015)  
North East Enfield Area Action Plan (Adopted June 2016)  
Blue and Green Strategy (2021 - 2031) June 2021

Enfield Local Plan (Reg 18) 2021 (DNELP)

- 9.11 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. As the emerging Enfield 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.
- 9.12 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.

**10. Analysis**

- 10.1. This report sets out the analysis of the issues that arise from the proposal when assessed against the development plan and the NPPF
- 10.2. This application has been subject to extensive negotiation to address the concerns raised by officers and local residents through the consultation process.
- 10.3. The main considerations of the development are the following:
- Principle of Development
  - Socio-economic considerations
  - Character and Design
  - Heritage, Townscape and Archaeology
  - Neighbouring Residential Amenity
  - Flood Risk and Drainage
  - Biodiversity. Trees and Landscaping
  - Traffic, Access and Parking
  - Sustainable Design and Construction
  - Fire Safety
  - Air Quality
  - Land Contamination
  - Health Impact Assessment
  - Digital Connectivity

Principle of Development

- 10.4. DMD19(2)(B) of the adopted Local Plan requires 'no significant net loss of industrial capacity' within SILs. Strategic Policy SP E3 of the DNELP place an even stronger

protection to SIL and requires 'no net loss' of light and general industrial, storage and distribution, research and development and related sui generis floorspace in SILs.

- 10.5. London Plan Policy E5 states that development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 and both Policies E5 and E7 state 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.
- 10.6. Policy E7 of London Plan encourages the intensification of business uses in Use Classes B1c (now class E(g)(ii) and/or (iii)), B2 and B8 occupying *all categories of industrial land through:*
- 1) *introduction of small units*
  - 2) *development of multi-storey schemes*
  - 3) *addition of basements*
  - 4) *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*
- 10.7. Whilst the LPA is currently in the final stages of a new Employment Land Review, the data underpinning the extant 2018 Employment Land Review indicates a need of 251,505 sqm of industrial and logistics floorspace up to 2039. The submitted Market Demand / Supply Assessment (as part the Planning Statement [submitted with the application] ) demonstrates that there has been lack of supply of industrial / logistics buildings in the North London market since 2017 despite the sustained and continuous increase in demand over the past 5-year period.

*Main logistics Building*

- 10.8. The site is designated as part of a Strategic Industrial Location (SIL). Officers and GLA have confirmed that the net gain in 16,248 m<sup>2</sup> GIA of E(g)(ii)/(iii), B2 and/or B8 units within the designated SIL is strongly supported.
- 10.9. The proposal includes a flexible multi-storey, large floorplate industrial unit which has been designed to cater for major industrial/logistics occupiers, creating a new regional distribution centre in direct response to market demand. Officers are satisfied that the proposal has been designed with sufficient layout and structural flexibility with the ability for subdivision to changing market demand in the future. This has also been confirmed by the Design Review Panel.

*Commercial, Business and Service Buildings*

- 10.10. Policy E2D of London Plan states that '*Development proposals for new B Use Class business floorspace greater than 2,500 sq. m. ... should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.*'
- 10.11. In a similar vein, DMD24 indicates that '*the provision of small business units will be sought as part of proposals for the redevelopment of an existing employment-generating site and as part of mixed-use schemes, in appropriate locations.*'
- 10.12. After pre-application discussions with officers, the proposal also includes five units which will deliver 2,040 sq. of employment floor space within the Commercial, business

and Service (CBS) Buildings which will meet with the objectives of this part of Policy E2 of the London Plan.

- 10.13. The CBS buildings will have a wider range of uses (Use Classes E, B2 and B8) to allow flexibility in response to market demand. As stated in Policy 21 of the DMD (2014), small scale walk-to services such as a workplace crèche or café which meet the essential day to day needs of the industrial occupiers will generally be permitted, provided that the proposed use is necessary to support industrial activity and it would not adversely affect the industrial status or operation of the area. Hence, it is considered the proposed Class E uses could help support the support the industrial / logistics uses in the area subject to an overall appropriate level of this type of use within the CBS buildings, which would be secured via a condition. Furthermore, use class E has a broad range of uses which include SIL non-compatible uses such as a creche, day nursery or day centre (Use Class E(f)). These uses would not sit comfortably alongside the industrial-type activities without careful design and sufficient mitigation due to the traffic, noise and air quality associated with the industrial and logistics uses within SIL. Hence, approval from the LPA would be required to use the CBS buildings for class E(f) uses. Considering the above, a condition has therefore been recommended to restrict the permitted development rights of these CBS buildings to ensure a balanced mix of Classes E, B2 and B8 uses and restrict non-SIL compatible uses in order to safeguard the integrity and effectiveness of the Great Cambridge Road and Martinbridge Trading Estate in accommodating industrial-type activities and their ability to operate on a 24-hour basis in accordance with Policies E5 and E7 of London Plan .
- 10.14. The proposal would provide a significant uplift of employment floor space with diverse unit sizes within the SIL, which would help meet the identified need for industrial and logistics floorspace. As such, it is considered that the principle of the proposed development is strongly supported, and specifically complies with the NPPF ), Policies E4, E5 and E7 of the London Plan , Policies 13 and 14 of Enfield's Core Strategy (2013) and Policy 19 of DMD (2014).

#### Socio-economic considerations

- 10.15. Policy CG5 of the London Plan seeks to ensure that the benefits of economic success are shared more equally across London. 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.
- 10.16. The submitted Economic Benefits Statement estimates that the proposed development would support 657 direct jobs and 772 indirect jobs during the construction phase, which would generate a total of £158.7m in economic output (GVA) over the construction phase. It is estimated that the proposed development would support approximately net 373-386 additional direct and indirect FTE jobs. It is also estimated that the proposed development could generate approximately a net increase in £0.8m per annum in business rates.
- 10.17. The Applicant would be required to use all reasonable endeavours to secure the use of Local Labour as 25% of the overall labour engaged in the demolition and construction phase, and to secure the use of Local Goods and Materials to the value of a minimum of 10% of the overall spend on construction of the Development, in accordance with the Enfield S106 SPD (2016). At the time of writing this report, officers are having ongoing discussions with the Applicant to confirm the number of

apprenticeships. An Employment & Skills Strategy (E&SS) and monitoring of the implementation of the E&SS would be secured by a S106 obligation.

Character and Design

- 10.18. 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.
- 10.19. 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.
- 10.20. 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.

*Tall Building and Massing*

- 10.21. Enfield Policy DMD 43 states:

*1. Tall buildings will not be acceptable in areas classified as inappropriate.*

*Areas inappropriate for tall buildings include those:*

- a. within and adjacent to the Green Belt;*  
*b. within the boundary or in the immediate vicinity of, or along views to, or from:*  
*Conservation areas;*  
*Nationally or locally listed buildings;*  
*Scheduled or locally listed ancient monuments; and*  
*Nationally or locally registered historic parks and gardens.*

- 10.22. Paragraph 6.4.1 of the supporting text of DMD 43 defines tall and large buildings as those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.
- 10.23. Policy D9 of the London Plan relates to tall buildings, stating that boroughs should determine if there are locations where tall buildings may be appropriate. The height of tall buildings will vary but should not be less than 6/7 storeys (or 18 metres to the floor level of the uppermost storey). 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. Recent case law has established that development can still be considered against policies D9 (C) and (D) even if Part B of Policy D9 cannot be complied with. London Borough of Hillingdon R (On the Application Of v Mayor of London [2021] EWHC 3387 (Admin) . It is therefore considered that it is appropriate to consider tall building proposals in the context of limbs D9(C)(2)(3) and (4) of London Plan Policy D9.



- 10.24. 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 Building within the Setting of Heritage Assets*
- 10.25. The proposed Main Logistics Building will have a maximum height of 29.6m and will be substantially taller than its surroundings. Hence, it falls within the definition of a ‘tall building’ in accordance with London Plan and Enfield Local Plan policies.
- 10.26. The Site is located within the setting of the Grade II Listed Ripaults Factory which is located north of the site on the opposite (northern) side of Southbury Road and Locally Listed Southbury Station which is located north-east of the Site.
- 10.27. Under the current adopted Enfield Local Plan policy, the proposed Main Logistics Building is located within an inappropriate area. However, 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). Although not adopted as policy and having limited weight, the Application Site is identified within a suitable location for tall buildings with a maximum height of 48m as set out within Figure 7.4 of the emerging Enfield Local Plan, being located within a 10-minute walk (or 800m radius) of Southbury Station.
- 10.28. The surrounding heritage assets have informed the layout and massing of the proposed development at an early stage of the planning process. Substantial improvements to the public realm along the Southbury Road frontage are proposed through new trees, a public square outside the Station and active frontages of the CBS buildings, which would improve the setting of the heritage assets. The Conservation Officers have confirmed that the proposed development would not result in harm subject to high quality building, landscape and public realm design to meet Policy D9 of London Plan (See the detailed analysis in ‘Heritage, Townscape and Archaeology’ section)
- 10.29. While the proposal is not considered to strictly 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 Councils identify appropriate locations for tall buildings and then assess 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 this policy. As part of an overall assessment, it is appropriate to consider the proposal against the criteria in parts (C) and (D) of the policy. Part (C)(1) specifically relates to visual impacts, including long-range, mid-range and immediate views, considered above.
- *Assessment against London Plan Policy D9*
- 10.30. 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 of the Local Plan. The below provides an analysis of the proposed

development against the requirements of Policy D9(C) of the London Plan, namely visual, functional, environmental and cumulative impacts.

- Visual impacts

- 10.31. Given the overall mass and scale of the Main Logistics building, it will be visible from some distance. Although visible, the proposed tall building would be consistent with the overall industrial character of the SIL and as such Officers are of the opinion that its appearance will not be out of character with its surrounds. The applicant has reduced the mass of the tall building by reducing the height by 3m and omitting the pedestrian link at first floor, and maximised the buildings setback from the eastern boundary to minimise bulk that will be visible from residential properties to the east. The inclusion of the two smaller CBS blocks and new tree planting fronting Southbury Road will introduce a more human scale frontage that will significantly reduce the impact of the large logistic building on the street scene.
- 10.32. The proposed building heights would also reinforce the building height hierarchy set out in the emerging Local Plan. The maximum height of Main Logistics Building is substantially lower than that of the approved tall buildings ranging from 126.000 m AOD. to 50.100 m AOD in the consented residential-led mixed used redevelopment at Colosseum Retail Park which is 100m north-west of the Site (ref: 20/00788/OUT).
- 10.33. The visual impact of the tall building therefore is not expected to raise any significant issues including visual impacts upon nearby heritage assets which have been discussed further within the 'Heritage, Townscape and Archaeology' section of this report. Also, the submitted External Lighting Assessment has demonstrated that the proposed external lighting would not result in significant impacts on the residential properties nearby. This has been discussed further within 'Neighbouring Residential Amenity' section.

- Functional impacts

- 10.34. The layout and proposed uses make an efficient use of the Site and will deliver floorspace that is demanded within both the SIL and the wider London area. The layout of the tall buildings is logical and will allow operations on the site to function efficiently. The fire safety, delivery and servicing and effect on solar energy generation on adjoining buildings are considered acceptable and discussed further in the 'Fire Safety', 'Traffic, Access and Parking' and "Neighbouring Residential Amenity' sections below.

- Environmental impacts

- 10.35. The applicant has incorporated a number of initiatives to ensure the scheme will enhance biodiversity and urban greening on the site (See also 'Biodiversity, Trees and Landscaping' section).
- 10.36. Despite some adverse and noticeable impacts on the daylight to some residential properties on Poppy Drive, the proposed building would not result in an adverse impact on sunlight, overshadowing and noise to them. Officers consider it is reasonable to consider the impacts on daylight within the context of SIL designation and the wider benefits delivered by the scheme. This matter has been further discussed within the 'Neighbouring Residential Amenity' section.

- 10.37. Based on the independent EIA screening opinion commissioned by the Council, the proposed development is not considered to have the potential to alter wind microclimate with reference to Lawson Comfort Criteria which is the most widely used standard to assess wind impacts on pedestrian safety and comfort.
- Cumulative impacts
- 10.38. The proposed building heights are considered to be responsive and appropriate to the changing character and scale of the local area within the designated SIL.



Figure 3: CGI of the proposed development (viewed from Southbury Road)

- *Overall*
- 10.39. Officers acknowledge that the proposed tall building is located within the setting of the surrounding heritage assets, contrary to DMD 43. However, the impact on the heritage assets have been sufficiently mitigated by the introduction of detached lower CBS buildings along Southbury Road together with proposed landscape and public realm improvements along Southbury Road, which would improve the setting of the Heritage assets (See also Heritage Townscape and Archaeology section). Officers have also assessed the visual, functional, environmental and cumulative impacts of the scheme and are of the view that the proposed development would be acceptable in accordance with London Plan D9(C)(D).
- 10.40. The Urban Design, Conservation and GLA Officers have no objection to the proposed height and massing. The DRP are also satisfied with the proposed design and layout. It is therefore considered that 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. The proposed industrial intensification within designated SIL is strongly supported which would create much needed employment floor space and jobs. 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.

- 10.41. The proposal is assessed as being in accordance with LP policies GG2 and D9(C) and (D). 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”.
- 10.42. 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).
- 10.43. On balance, the proposed height and massing 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 .

*Layout*

- 10.44. The current public realm along Southbury Road is poor with high boundary fencing and predominately hardstanding. Policy 16.1 of the North East Area Action Plan (2016) states that the Council will develop a comprehensive street design scheme which helps to improve the setting of the station and improve pedestrian and cycle movements. The Council’s Green and Blue Infrastructure Strategy (2021) envisages a Green Link along Southbury Road which forms part of the latest emerging plan’s evidence base.



Figure 4: Existing poor streetscape along Southbury Road

- 10.45. The proposed development includes a row of two CBS Buildings along Southbury Road with entrances and substantial glazing fronting the street, which would activate the street. These CBS buildings have also been set back to allow a tree-lined pedestrian route in line with the Green Link aspiration in the Green and Blue

Infrastructure Strategy (2021). Whilst Officers would prefer the CBS block B to be flush with the adjacent proposed building, to allow sufficient space for the emerging Council-led two way cycle lanes along the southern side of Southbury Road, the Journeys and Places Team have undertaken a high level feasibility study, which has demonstrated that the works could still be accommodated with the current layout subject to relocation of the existing bus shelter and use of some carriageway (See also 'Traffic, Access and Parking' section). The applicant has also confirmed that Block B cannot be set back further due to the impact on the space available to the rear of the block for servicing. Hence, officers consider that the proposed layout would not compromise the future delivery of the public realm improvements along Southbury Road.

- 10.46. The proposed layout also includes a generous 11m wide landscape strip including 3m wide north-south pedestrian path along the eastern side, which would also help mitigate the impact of the Main Logistics Building upon residential properties to the east.
- 10.47. The overall layout of the site allows for suitable separation between different transport modes to maximise safety within and around the site. The staff parking at the rear of the site also allows for more activation of the site along the street frontage.

*Landscaping and public realm*

- 10.48. Along Southbury Road, the proposal includes 5 to 7.5 metre wide public realm for pedestrians. 2 existing trees with high amenity values will be retained together with 22 new semi-mature street trees and deep planting beds along this frontage.
- 10.49. An arrival square outside Southbury Station will also be created which will provide opportunity for new seating, cycle stands and wayfinding. Officers are having ongoing discussion with the Applicant and Network Rail and TfL (the landowner) to explore potential extension of the new public square to the Station. Appropriate obligations relating to delivery could be secured via a S106 agreement.
- 10.50. Along the eastern side of the Site, the scheme will include an 11 metre wide landscape strip with a pedestrian/cyclist shared north-south route, which would primarily be used by the staff and visitors of the units. It is noted that the emerging Local Plan has an aspiration of creating new walking route opportunities within the Site to connect Lincoln Way and Southbury Road as shown in Figure 3.3 Southbury Placemaking vision of the emerging Local Plan. Officers have explored the possibility of making the proposed north-south route more accessible by creating external steps directly from the proposed new station square into the site. However, the Applicant has provided justifications to demonstrate that this is not feasible nor viable mainly due to the difference in site levels between the site and the new station square, and a substantial amount of land of the north-south route within the land needed to be given up for public access. Other active travel measures will be secured to improve the walking and cycling infrastructure in the area (See 'Traffic, Access and Parking section below'). The frontages along Southbury Road would be substantially improved as set out above. It is therefore considered that the current proposal would be largely in line with aspirations of Policy PL2 (6) of the emerging Local Plan to contribute to improvements to the public realm and townscape particularly along Great Cambridge Road and Southbury Road, albeit noting this draft Local Plan Policy currently holds relatively little weight.
- 10.51. Two staff amenity gardens are proposed adjacent to the CBS units. These gardens will have a combination of lawn and paved areas with benches and picnic tables. The

Applicant has been encouraged to further explore the potential of increasing the external amenity spaces provision such as along the north-south route. The provision of staff external amenity space would be conditioned as part of the landscape condition

- 10.52. Within the car parking area at the rear of the site, a range of porous paving options within the parking spaces is being explored, such as grasscrete and cellular gravel and using the drainage water to feed the tree pits. The CBS buildings will also incorporate green roofs.
- 10.53. The final details of the landscape plans will be secured via conditions to ensure the overall landscape scheme integrates with other considerations including sustainable drainage, biodiversity enhancement, amenity space provision, visual appearance, fire safety, security and external lighting.

*Detailing and materials*

- 10.54. The detailing of the buildings would broadly reflect some common features in the area particularly the proposed use of brick for the CBS buildings which would complement the redbrick of Southbury Station and other notable brick buildings in Ponders End. The proposed substantial green wall across all levels at the north-east corner of the Main Logistics Building would also create visual interest and improve legibility. Following the advice from the Design Review Panel and Officers, the Applicant has made positive changes to enhance the appearance of the proposed buildings such as new ground-based green walls along the ramp and simplifying the windows design of the CBS buildings.

*Inclusive Design*

- 10.55. London Plan Policy D5 requires all new development to achieve the highest standard of accessible and inclusive design and to be able to be used easily and with dignity by all. All entrances would be at grade with level thresholds as shown on the submitted drawings. All the disabled parking spaces are located close to the entrances. The Fire Statement illustrates all lifts would be accessible in accordance with British standards. A condition will also be attached to ensure compliance in accordance with Policy D5 of the London Plan (2021). The proposal is able to comply with London Plan inclusive design policies.

*Secure by Design*

- 10.56. During the course of this Application, the Applicant met with the Designing Out Crime Officer (DOC) at the Metropolitan Police, and feedback was integrated into the proposed design. The DOC Officer initially raised a concern over the risk of traveller intrusion given the siting of the proposed gate houses away from the main vehicular access. However, a gatehouse near the entrance may disrupt the traffic on the Southbury Road when the vehicles queue into the Site. The DOC Officer confirmed that the risk of traveller intrusion can be mitigated by robust CCTV surveillance.
- 10.57. Overall, the Metropolitan Police have confirmed they have no objection to the application subject to a final 'Secured by Design' certification, declaration of conformity of the proposed lighting details to BS 5489-1:2013/2020 and CCTV details. Conditions have therefore been recommended in accordance with Policy D11 of the London Plan and Policy DMD 37 of the Development Management Document (2014).

*Conclusion on Character and Design*

- 10.45. Considering the above, the proposed height, massing, layout and appearance is generally consistent with the industrial character of the wider SIL and the emerging context. The proposed development with high quality building design and public realm and landscape improvements would not result in harm to the immediate setting of the heritage assets. Where some suggestions made by officers have not been pursued, the applicant has provided sufficient justifications. On balance, it is considered that the proposed development would improve the frontages on the public realm particular along Southbury Road which currently hosts a utilitarian building and mainly hardstanding. The proposed development therefore would comply with Policies D3 and D4 of the London Plan, CS30 of the Core Strategy, DMD23, DMD37 and DMD39 of the DMD.

Heritage, Townscape and Archaeology

- 10.46. 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”*.
- 10.47. 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).
- 10.48. London Plan Policy HC1 requires development proposals which affect the setting of heritage assets (designated and non-designated) to be sympathetic to their significance and appreciate their surroundings. Harm should be avoided, and enhancement opportunities taken where they arise. 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.

10.49. The first step is for the decision-maker to consider each of the designated heritage assets (referred to hereafter simply as “heritage assets”) which would be affected by the proposed development (the applicant should describe the significance of the heritage assets affected) in turn and assess whether the proposed development would result in any harm to the heritage asset. The decision of the Court of Appeal in *Barnwell Manor* confirms that the assessment of the degree of harm to the heritage asset is a matter of planning judgement for the decision-maker. However, where the decision-maker concludes that there would be some harm to the heritage asset, in deciding whether that harm would be outweighed by the advantages of the proposed development (in the course of undertaking the analysis required by s.70 (2) of the Town and Country Planning Act 1990 and s.38 (6) of the Planning and Compulsory Purchase Act 2004), the decisionmaker is not free to give the harm such weight as the decision-maker thinks appropriate. Rather, *Barnwell Manor* establishes that a finding of harm to a heritage asset is a consideration to which the decision-maker must give considerable importance and weight in carrying out the balancing exercise. There is therefore a “strong presumption” against granting planning permission for development which would harm a heritage asset. In the *Forge Field* case the High Court explained that the presumption is a statutory one. It is not irrefutable. It can be outweighed by material considerations powerful enough to do so. However, a local planning authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering. The case-law also establishes that even where the harm identified is ‘less than substantial’ (NPPF para 199), that harm must still be given considerable importance and weight. Where more than one heritage asset would be harmed by the proposed development, the decision-maker also needs to ensure that when the balancing exercise is undertaken, the cumulative effect of those several harms to individual assets is properly considered. Considerable importance and weight must be attached to each of the harms identified and to their cumulative effect. It is important to note that the identification of ‘less than substantial harm’ does not equate to a ‘less than substantial’ objection<sup>1</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>2</sup>. What follows is an officer assessment of the extent of harm which would result from the proposed development.

10.50. 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.

*Built Heritage in the immediate locality*

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

10.52. The Application Site is within the immediate setting of ‘Ripaults Factory’, a Grade II Listed Building (c.1930) in an art deco style. Adjacent to the site is Southbury Station,

<sup>1</sup> *Barnwell vs. East Northamptonshire DC 2014* (para.29)

<sup>2</sup> *Kinsey vs. London Borough of Lewisham 2021* (para.84)



a Locally Listed building (1891). Other locally listed buildings are located in the wider vicinity of the site along with the Grade II listed Enfield Technical College (now known as the Heron Hall Academy) which is located approximately 150 metres to the south-east on the eastern side of the railway line.

- 10.53. Following officers' pre-application advice, the applicant has revised the proposal and placed the proposed smaller detached CBS buildings (10.25 m - 8.6m in height ) at the front of the site which would help to better define the streetscape whilst also providing a degree of screening for the larger massing of the proposed main logistics building. This is accompanied by a generous hard and soft landscaping scheme to Southbury Road including a new station square with public art.
- 10.54. The Conservation Officer confirmed whilst there is potential for harm to be caused, this can be fully mitigated through high quality architecture and landscaping which would help realise heritage benefits to the historic environment. Conditions have therefore been recommended to seek detailed drawings and materials of the building and the hard and soft landscaping plans to ensure the proposed structures would not have a detrimental impact upon the setting of the Grade II Listed Ripaults Factory and Locally Listed Southbury Station. A condition has been attached to ensure the CBS buildings will be completed prior to the occupation of the development.
- 10.55. The delivery of new public square and public arts strategy will be secured by S106 obligations.
- Townscape and views*
- 10.58. 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.
- 10.59. 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.
- 10.60. A Built Heritage, Townscape and Visual Impact Appraisal was prepared by Turley Heritage and submitted in support of the planning application. The report assesses designated and non-designated built heritage assets that may be affected by the development, including the contribution of their settings to their significance, and concludes with an assessment of impact of the proposed development on the significance of relevant built heritage assets.
- 10.61. The visual appraisal identified a 1km zone of visual influence from the proposed development comprising local, short distance views as well as long distance views and assessed the impacts on 12 representative views including from Forty Hall Registered Park and Garden near the ferme ornee, and the two Important local views as identified in the Report on Location of Tall Buildings and Important Local Views in Enfield (March 2013), namely from Enfield Town (view 9) and King's Head Hill (view 2).
- 10.62. Conservation Officers considered the submitted assessment proportionate. Overall, it is considered that due to the distance and intervening built form, the proposed scheme is unlikely to have an impact upon the significance of heritage assets. This has been demonstrated through the Zone of Theoretical Visibility and Verified Views.

*Heritage Conclusions*

- 10.63. The steps for assessing proposals affecting heritage assets are as set out in the NPPF Section 16: Conserving and Enhancing the Historic Environment and amplified by Historic England GPA 3: The Setting of Historic Assets. The duty to pay 'special regard' or 'special attention', in sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 means that there is a 'strong presumption' against the grant of planning permission where it would cause harm to a heritage asset. 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.
- 10.64. Having taken into account the aforementioned heritage benefits including the proposed public realm and landscape improvements to Southbury Road and near the Station, Officers consider that on balance, the proposed scheme would not cause harm to the setting of the Grade II Listed 'Ripaults Factory' and Locally Listed Southbury Station subject to mitigation including high quality building architecture, public realm and landscaping and the completion of the CBS buildings to offer screening of the mass of the main logistics building prior to occupation of the development, which would be secured through conditions.

*Archaeology*

- 10.65. The site is located within Southbury Road Archaeological Priority Area. Greater London Archaeology Advisory Service (GLAAS) has reviewed the Archaeological Desk-based Assessment prepared by MOLA on behalf of the Applicants and confirmed that the proposed development would not result in significant harm on the Southbury Road Archaeological Priority Area.

Neighbouring Residential Amenity

*Daylight, sunlight and overshadowing*

- 10.66. London Plan Policy D9(3)(a) requires daylight and sunlight penetration around the tall buildings carefully considered. DMD 39 (1)(f) requires business premises to through layout, landscaping and other site features, helps to mitigate the potential for negative impacts on surrounding uses, including consideration of access arrangements for different uses within the site and wider area. In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. The BRE Guide itself emphasises that the target numerical values for measuring daylight, sunlight and overshadowing it contains are "advisory" and may be "varied to meet the needs of the development and its location". Hence, in accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.
- 10.67. A Daylight, Sunlight, Overshadowing and Photovoltaics Assessment has been submitted. The submitted report has been completed by daylight/sunlight specialists with reference to the Building Research Establishment (BRE) Guidelines "Site Layout Planning for Daylight and Sunlight. A Guide to Good Practice" (BR209, 2022) and local planning policy. The following neighbouring properties were identified as relevant for daylight, sunlight, overshadowing and photovoltaics assessment based on proximity to the proposed development:



		advers e impact	e adverse impact	l adverse impact		advers e impact	e adverse impact	l adverse impact
1-26 Emelia Close	92	0	0	0	34	0	0	0
Link House (300 Southbury Road)	70	0	0	0	49	0	0	0
1-6, Poppy Drive	11	0	0	0	6	0	0	0
7-12 Poppy Drive	12	0	0	0	6	0	0	0
13-18 Poppy Drive	12	0	2	0	6	0	0	0
19-24 Poppy Drive	12	2	0	0	6	0	0	0
25-30 Poppy Drive	12	2	0	0	6	0	0	0
31-36 Poppy Drive	14	2	3	0	12	2	4	6
37-44 Poppy Drive	14	2	1	2	12	0	5	7
45-52 Poppy Drive	14	8	0	0	12	0	5	7
53-60 Poppy Drive	14	3	3	0	12	1	4	7
61-68 Poppy Drive	14	1	1	2	12	4	1	6
69-76 Poppy Drive	14	0	1	0	12	5	0	0
77-84 Poppy Drive	14	0	0	0	12	0	0	0
85-109 Poppy Drive	43	0	0	0	30	0	0	0
<b>Total</b>	<b>352</b>	<b>20</b>	<b>11</b>	<b>4</b>	<b>227</b>	<b>12</b>	<b>19</b>	<b>33</b>

- 10.71. As shown from Table 2 above, among the 352 habitable windows tested, 20 windows will experience a minor adverse impact, 11 windows will experience moderate adverse impact and 4 windows will experience substantial adverse impacts in relation to VSC.
- 10.72. In recent years, Inspectors and other decision makers have observed that achieving the BRE target level of VSC is challenging whilst seeking to make more efficient use of brownfield land in urban areas. For example, in the appeal decision relating redevelopment of the site for a phased mixed-use scheme, comprising 5 blocks of varying heights of between 9 and 37 storeys (including rooftop amenity) at Land to the north and south of Goldsworth Road, Woking (ref: APP/A3655/W/21/3276474), the inspector states the following in paragraph 35:
- “Retaining a VSC level of 27% in neighbouring properties is unrealistic; as has been recognised in many appeal decisions and other documents. Even retaining 20% VSC is considered, generally, to be reasonably good, and in urban areas retaining around mid-teen % VSC is considered acceptable”.*
- 10.73. Out of the 35 windows experiencing more than 20% reduction in VSC level, 15 of them will still retain an absolute VSC of above 20%.
- 10.74. Crucially these windows will experience noticeable changes in daylight mainly due the architectural design of these properties on Poppy Drive which includes several built in recessed balconies with projecting wings either side. Waldram diagrams have been submitted as part of the assessment and demonstrates that the existing architectural design of these properties currently restricts good levels of natural light received to the site facing window and rooms on ground and first floor (See the Figure 6 for the typical rear elevation of Poppy Drive).
- 10.75. The BRE Guidelines reference that *‘a larger reduction in VSC may also be unavoidable if the existing windows has projecting wings on one or both sides of it, or is recessed into the building so that it is obstructed on both sides as well as above’.*



Figure 6 53-60 Poppy Drive

- 10.76. The submitted assessment results show that all of windows not located behind recessed balconies or side projections will retain VSC levels which are considered to be appropriate for an urban environment.
- 10.77. With regard to NSL, among the 227 habitable rooms tested, 12 habitable rooms will experience a minor adverse impact, 19 windows will experience moderate adverse impact and 33 windows will experience substantial adverse impacts.
- 10.78. The impacts on NSL of these habitable rooms are mainly because Poppy Drive properties benefit from larger than average room depths, reaching c.7-8m in depth, which can impact the extent of the reduction in daylight distribution (NSL) as shown in a typical NSL contour of the ground floor rooms on Poppy Drive below. The Guidelines state that *“If any existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the No Sky Line may be unavoidable”*.

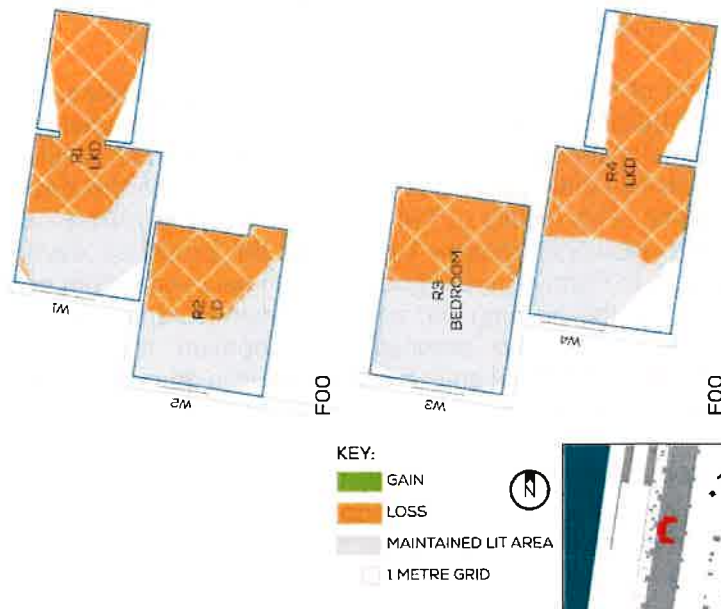


Figure 7 NSL contours of Ground Floor 53-60 Poppy Drive

- 10.79. The substantial percentage loss in NSL is acknowledged. However, due to the existing low-rise condition of the site, the west-facing windows and rooms of the properties on Poppy Drive overlooking the site, benefit from unusually high levels of daylight and sunlight for an urban area. This has subsequently produced disproportionately high percentage changes. 39 rooms out of these 64 rooms experiencing 20% reduction will still retain a view of the sky dome of almost 50% + of the room in the proposed scenario and thus have the potential to receive natural light.
- 10.80. Concerns have been raised during the public consultation regarding the impact of the proposed development on daylight and sunlight available to Nos 57 and 60 Poppy Drive. 57 Poppy Drive is a 1 bedroom flat on first floor within the rear projection. 60 Poppy Drive is a two bedroom flat on second floor. The submitted analysis has shown the BRE default targets have been met in terms of VSC (See Figure 6 above) and NSL. Hence, it is considered the proposed development would not result in any adverse impact on the daylight to both properties.
- 10.81. It is considered the proposed development will result in some adverse impact on the daylight of some ground floor and second floor flats on Poppy Drive given the number of windows and rooms experiencing non-compliance to the BRE default VSC and NSL targets and the degree of the non-compliance. However, the impacts are mainly exacerbated by the existing architectural features including projecting wings and projecting balconies, and deep room depths of these properties. In order to optimise the use of brownfield land in such a highly sustainable location for industrial intensification within designated SIL, an increase in height and massing is inevitable. The impact on daylight to these properties has been minimised. Following the comments received from officers and the public during pre-application discussions, the set-in of the Main Logistics Building from the eastern boundary has increased to 25-21m. The overall height of this building has also been reduced by 3m. The pedestrian link bridge in the rear car park has also been removed. Overall, Officers consider that the adverse impacts on daylight when balanced against the wider public benefits generated by the scheme are not a reason for refusal.
- 10.82. In terms of sunlight, the proposed development would fully satisfy BRE's default target for the Annual Probably Sunlight Hours ('APSH') test.
- 10.83. In terms of overshadowing to the neighbouring gardens, the BRE guidance (2022) advises that if less than 50% of the existing garden or amenity area can receive at least two hours of sunlight on 21 March or the area that can receive two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable. The results of the Transient Overshadowing Assessment demonstrates that the additional shadow caused by the proposed development to the gardens belonging to Poppy Drive will be limited to between 4-5pm only. No change in shadow will occur in the morning and early afternoon when these amenity spaces are likely to be most used. The proposed development therefore would meet the BRE overshadowing targets and would not result in an unreasonable overshadowing to the neighbouring properties.
- Effect on solar energy generation*
- 10.84. Some PV panels are installed on the rooftop of the buildings on Poppy Drive. A Transient overshadowing assessment has been undertaken. It confirms that given the height and proximity of the proposed development; the building shadow does not cast onto the roof of 1-109 Poppy Drive. Hence, the proposed development is unlikely to

result in any adverse impact on the existing solar energy generation of 1-109 Poppy Drive.

*Privacy*

- 10.85. Following comments from the public and officers' advice during pre-application discussions, the Applicant has relocated the proposed offices from the eastern elevation of the Main logistics building to a stacked office layout at mezzanines level on the northern elevation. As a result, there will only be two strips of flank windows across all levels along the eastern elevation serving the firefighting stair core, plant rooms and breakout area / meeting rooms. These windows will be located at least 50m away from the rear boundary of the nearest residential properties on Poppy Drive. Considering the above, it is considered that the proposed development would not result in any unreasonable overlooking to the adjoining properties.

*Noise*

- *Construction*

- 10.86. It is proposed that construction noise and vibration will be controlled through the use of a Construction Environmental Management Plan (CEMP). Details of the CEMP were provided in section 5.0 of the Noise and Vibration Assessment and it has been confirmed by the Environmental Health Officer that this is satisfactory. A condition will be attached to ensure compliance.

- *Operation*

- 10.87. Noise from site activity during the night-time period will be below existing noise levels which are dictated by existing industrial noise, road traffic noise and noise from the adjacent rail line which forms the eastern site boundary.
- 10.88. The closest residential properties in Poppy Drive are to the east of the site on the other side of the rail line which forms the eastern boundary of the site. These properties were granted planning permission on Appeal. Being so close to the rail line these properties will have been designed and constructed to protect residents from existing noise levels, including industrial, road traffic and rail noise and are likely to include mitigation measures such as acoustic glazing and alternative means of ventilation to enable windows to be closed to achieve satisfactory daytime and night time internal noise levels. These measures will also protect residents of these properties against noise from the proposed development which as advised above is lower than existing noise levels.
- 10.89. The Noise and Vibration Assessment demonstrates that maximum levels, LAfmax associated with site activity will be below existing maximum noise levels measured on-site.
- 10.90. During the course of this application, the Applicant has also provided a technical noise addendum and updated the SoundPLAN models in response to the comments from the public and Environmental Health Officer. Taking the proposed noise from the first floor service yard into account, a BS 4142 noise assessment has been provided to illustrate night-time LAeq levels at the receptors from the proposed development which is considered acceptable by the Environmental Health Officer
- 10.91. Given the contextual considerations, the Environmental Health Officer has confirmed that the proposed development is unlikely to result in any adverse noise impact on the residential properties nearby. As the plant details cannot be confirmed at this stage

until the tenants are known, a condition will be attached to ensure the future plants will not result in an unacceptable noise level to the nearby residents.

*Light spill*

- 10.92. Different areas of the site will be lit by a mix of column mounted lanterns and building mounted lanterns to satisfy the operational needs while minimising the light spill to the residential properties in the locality. An External Lighting Assessment has been undertaken. A plan showing the design lux levels within the site demonstrates that given the lighting intensity and distance, the proposed lighting will result in minimal light spill onto the railway tracks. The impact would be further mitigated by the proposed 11m wide landscape buffer along the eastern boundary. The Environmental Health Officer has no objection.
- 10.93. During the course of this application, in response to the comments from the Environmental Health Officer, the boundary treatment along the first floor service yard has changed from mesh railing to louvred in order to prevent headlights of vehicles affecting residents on Poppy Drive. The details of proposed louvres has not been provided. The Environmental Health Officer would prefer solid materials to avoid any gaps for headlights to affect nearby residents. A condition for boundary treatments is recommended to request revised boundary treatments.

*Conclusion on Neighbouring Residential Amenities*

- 10.94. Overall, it is considered that the proposed scheme has been designed to respond to BRE's criteria as much as possible while optimising the site to deliver employment floorspace within designated SIL, in accordance with relevant policies within Enfield's Local Plan and The London Plan. The submitted Assessment has demonstrated that the default BRE targets for sunlight and overshadowing have been met. Hence, the impacts on these aspects are considered acceptable.
- 10.95. Whilst the proposed development would result in some adverse impacts on the daylight to some ground floor and first floor flats on Poppy Drive, the impacts need to be considered in the context of the particular design characteristics and internal layout of these residential properties, and the fairly minimal existing massing on the Application site which is unusual in an urban context. The Site is within designated SIL next to Southbury Station where industrial intensification in a highly sustainable location is strongly supported by the London Plan. On balance, Officers consider that when balancing the overall impact of the scheme in terms of daylight, sunlight and overshadowing with the many planning benefits that the scheme would deliver, the overall balance weighs in favour of the proposal.
- 10.96. The internal layout, external fenestration, site layout has also been carefully designed to avoid unreasonable overlooking to the nearby residential properties. The proposal has also been informed by technical noise and external lighting assessment to avoid any detrimental impacts on the amenities of the neighbouring dwellings in terms of noise, disturbance and light spill.
- 10.97. Overall, it is therefore considered that the proposal would be in accordance with Policies D3, D4, D6 and D14 of the London Plan (2021), CP 4 of the Enfield Core Strategy (2010) and Policies DMD 8, 10, 37, 68 and 69 of the Enfield Development Management Document (2014).



Flood Risk and Drainage

- 10.98. Policy SI 13 of the London Plan ) requires development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the specified drainage hierarchy. Policy DMD 61 states developments should seek to achieve Greenfield runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) year events and must maximise the use of Suds, including at least one 'at source' SuDS measure resulting in a net improvement in water quantity or quality discharging to sewer in-line with any SuDS guidance or requirements.
- 10.99. Flooding is not a known risk on this site. Classed as Flood Risk 1, the site is at low risk of fluvial flooding. The existing site mainly comprises impermeable surfaces. Based on the Enfield Level 1 Strategic Flood Risk Assessment, localised areas of the site are prone to surface water flooding for the 1 in 100 year (+17% climate change allowance) due to surface water generated from site.
- 10.100. A preliminary Flood Risk Assessment and Sustainable Drainage strategy has been submitted with the application. During the course of the application, the applicant has provided further modelling results of the existing drainage system to verify the model results provided in the Flood Risk Assessment are accurate. The proposed development would achieve green field run-off rates through a mix of above ground SUDS features and below ground tanks.
- 10.101. Upon the request from the Watercourses Team, the applicant has further improved the proposed sustainable surface water drainage strategy by including additional rain gardens, swales, rainwater harvesting, biodiverse roofs and understug and rainwater downpipes to discharge the runoff from the first floor service yard onto the permeable paving. The risk of siltation from the first floor service yard could be mitigated by a robust maintenance plan which would be secured via a condition. As a result, a substantial majority of the impermeable surface of the site would drain via SUDS source control measures.
- 10.102. The Council's Watercourses team has requested sight of the final design of the drainage strategy, and details of the proposed SuDS features and a management plan for future maintenance. A drainage verification report is also recommended to ensure compliance of the final drainage details. The requested information would be secured by way of conditions in accordance with Policies SI 12, SI 13 of the London Plan (2021), Policy CP 28 of the Enfield Core Strategy (2010) and Policies DMD 59, DMD 61 and DMD 63 of the Development Management Document (2014).
- 10.103. The proposed development is located within 5m of a strategic water main along Southbury Road. Thames Water requested a plan for diversion of the main water in case of any construction work within 5m of the strategic water main. This will be secured by condition.
- 10.104. Thames Water have no objection to the foul water sewerage network infrastructure capacity.

Biodiversity, Trees and Landscaping

- 10.105. Policy DMD 76 states that development on sites that abut a wildlife corridor will only be permitted if the proposal protects and enhances the corridor. Policy DMD 78 states that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided,

and it has been demonstrated that appropriate mitigation can address the harm caused.

- 10.106. Policy G7 of the London Plan (2021) and Policy DMD 80 of the Development Management Document (2014) state that any development involving the loss of or harm to protected trees or trees of significant amenity or biodiversity value will be refused.

*Statutory Designated Sites*

- 10.107. The site is mainly comprised of hardstanding with some grass verges and small urban trees. Adjacent to the eastern side boundary, there is a designed Wildlife Corridor running along the railway line. The site is within 2km of the Chingford Reservoir SSSI and 3.1km of Epping Forest SAC and SSSI.
- 10.108. The submitted Ecological Appraisal Report with an ecological desk study concludes that the impact of the proposed development on the statutory designated sites in the surrounding 5km is expected to be negligible given the distance between the Site and the designated sites, coupled with the fact that the Site is located within a heavily urban area.
- 10.109. With regard to Epping Forest SAC, the Council as a Competent Authority has commissioned an external EIA/Ecology consultant to undertake an HRA Screening Report. The Report shows that given all associated HGV trips from the proposed development are anticipated to travel west from the site, away from Epping Forest SAC, there's no likely significant effect on the Epping Forest SAC. Natural England have reviewed the HRA Screening Report during the EIA Screening Opinion consultation (ref: 23/00488/SO) and confirmed that it is not necessary to progress to Stage 2: Appropriate Assessment. The LPA as a competent authority concurs with this opinion.
- 10.110. A Construction Environmental Management Plan (CEMP) has been submitted to minimise any potential impact during construction. A compliance condition will be attached to ensure the measures are followed.

*Trees*

- 10.111. The Tree Survey indicates a total of 15 existing trees and 5 groups of trees on site. Of these trees, only 1 tree is 'category A' (high grade), 3 trees are 'category B' (moderate grade), 10 individual trees and 5 groups of trees are 'category C' (low grade) and 1 tree is 'Category U' (very low grade).
- 10.112. 10 x low quality category C trees / tree groups and 1 x very low-quality category U tree will be removed to facilitate the proposed development. To compensate the loss of trees for the development, 193 new trees will be planted and 718m of native hedgerow will be created.
- 10.113. The proposed removal of existing hard surfaces and construction of new buildings will take place within the Tree Root Protection Areas (RPAs) of a category A street tree (T13) and a category B tree (T7) along Southbury Road. To minimise impact on these trees, an Arboricultural Method Statement and Tree Protection Plan will be secured through a planning condition. The Tree Officer has also suggested that given the asymmetrical form of the crown of T13, which would benefit from pruning back from the adjacent highway to bring the tree back into shape, fewer pruning works are

required on the development side. Again, this would be secured through the condition for an Arboricultural Method Statement.

- 10.114. The street tree (T13) is a London Plane which produces a dust on the underside of their leaves which can contribute towards eye nose and throat irritation, shade, bird excrement, and leaf fall. Whilst Officers would have preferred the CBS building B to be set back to alleviate potential conflict with the future tenants, the CBS building B does not involve any residential use and the Applicant has explored this option but confirmed it would not be viable due to the impact on the space available to the rear of the block for servicing. Given this street tree would still be retained, the proposed layout of the CBS building B is considered acceptable on balance.
- 10.115. On balance, the Tree Officer has no objection to the proposed development subject to above mentioned Arboricultural Method Statement and Tree Protection Plan condition to ensure the health and longevity of the retained trees.

*Habitats and Biodiversity Net Gain*

- 10.116. A Biodiversity Impact Assessment following the Natural England Metric 3.1 methodology has been undertaken to calculate the ecological value of the pre- and post-development site.
- 10.117. The existing site is dominated by building and hardstanding. The proposals include the creation of mixed scrub, introduced shrub, other neutral grassland, ground based green wall, façade bound green wall and biodiverse roofs, amongst other habitats. The proposals also include the planting of 193 new trees and the creation of 718m of native hedgerow
- 10.118. The Biodiversity Impact Assessment demonstrates that the proposed development would result in a net gain of 3.68 biodiversity units (area based) and 1.28 biodiversity units (linear based) compared with pre-development value. This is equivalent to a total net increase of 442.65% (area based) and 100% (linear based) in ecological value. This would exceed the emerging statutory minimum BNG requirement of 10%.
- 10.119. Policy G5 of London Plan (2021) requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. This policy does not specify the minimum UGF target for industrial/logistics led mixed scheme ((Use Classes E(g)(iii), B2 and B8). An Urban Greening Factor Assessment has been undertaken in accordance with the Urban Green Factor LPG (2023). Whilst the proposed development will achieve a UGF score of 0.22 which would fall 0.08 short of the aspirational target for commercial developments (0.3), officers consider that green infrastructure has been maximised given the site constraints, and the development proposals represent a significant improvement on the current site conditions. The proposed landscape buffer along the eastern boundary would also enhance the adjacent Wildlife Corridor along the railway line.
- 10.120. Detailed landscaping plans and an Ecological Management Plan will also be secured by a landscaping details condition to ensure the delivery of the BNG and the greenery and its management for a period of at least 30 years in accordance with Policy DMD 81 and Policies G5 and G6 of London Plan (2021)

*Protected Species*

- 10.121. The submitted Preliminary Ecological Appraisal (PEA) Report indicates the Site has the potential to support the following protected/notable species:
- High potential to support nesting birds;
  - Low potential to support roosting bats;
  - Low potential to support reptiles; and
  - Moderate potential to support hedgehog
- 10.122. The PEA confirms no further surveys for nesting birds. It recommends site clearance is undertaken outside of active nesting period (March to August inclusive) unless a suitably qualified ecologist has confirmed absence of active nests. This would be secured by a compliance condition.
- 10.123. The PEA also recommends phased vegetation clearance between April and September during warm weather conditions to avoid any harm to reptiles and hedgehogs. This would be secured by a compliance condition.
- 10.124. With regard to bats, the submitted Bat Survey Report has confirmed the likely-absence of roosting bats within the building on site and concluded that given the dominance of building and hardstanding on site, the sites value for foraging and commuting bats is limited and confined mainly to the north east corner of the site. To mitigate and enhance the habitats for foraging and commuting bats, a bat sensitive lighting scheme, fruit and berry producing shrubs and trees in the landscaping scheme and at least 6 bat boxes or bricks are recommended. The details of these measures would be secured via conditions.

*Conclusion on Biodiversity, Trees and Landscaping*

- 10.125. Considering the above, the proposed development would not result in any significant harm to the trees of high amenity values or the local wildlife including the Epping Forest SAC and adjoining Wildlife Corridor. It would enhance the local biodiversity and greening subject to final details on the proposed landscaping scheme, proposed biodiversity enhancement measures and an Ecological Management Plan, which would be secured by conditions. The proposal therefore would comply with Policies G5, G6 and G7 of the London Plan (2021), Policy CP36 of the Enfield Core Strategy (2010) and Policies DMD76, 78, 79, 80 and 81 of the Enfield Development Management Document (2014).

Traffic, Access and Parking

*Trip Generation*

- *Staff and operational*
- 10.126. The trip generation methodology and the assumptions about mode split and traffic distribution to the highway network have followed the pre-application advice from the Places and Journeys Team and TfL. The Transport Assessment indicates the site will generate circa 800 additional daily vehicle movements compared to existing demand, this includes around 380 Heavy Goods Vehicles (HGV). The peak hour increase in demand will be circa 70 vehicle movements including 34 HGVs.
- 10.127. Following Officers' advice during pre-application discussions, a sensitivity test has been undertaken to assess the impact of the site access/junction from Southbury Road. The modelling shows that trip generation could increase by 500% AM and 625%PM before the Ratio of Flow to Capacity (RFC) exceeds 0.85 (i.e. when the

access junction suffers significant delays and queueing). The modelling of the actual estimates shows that the maximum RFC will be 0.53, which is well within the junction capacity. This is accepted by both Places and Journeys Team and TfL.

- 10.128. The distribution included a "worst case scenario", whereby 100% HGV movements went through to the A10 / Southbury Road junction. The % increase in vehicles using the A10/Southbury Road junction, based on the existing traffic flows Automatic Traffic Count (ATC) data was shown to be 1.6% (AM) 1.3% (PM). Given the relatively low impact, both TfL and LBE Journeys and Places Team are satisfied that the impact on the strategic highway network (A10) has been assessed appropriately.
- 10.129. Following the comments from National Highways (NH), the Applicant has also provided a Technical Note regarding vehicle trip generation and its distribution / assignment up to the M25 Junction 25, which is a strategic road network (SRN). NH has confirmed that they are satisfied that the proposal would not materially affect the safety, reliability, and/or operation of the strategic road network (SRN).

- *Underground and Train, Buses*

- 10.130. The applicant has forecast trips on both underground and rail. TfL agree with the applicant's conclusion that all trips should be focused on Southbury station given its proximity. The proposal is not expected to generate the need for additional bus capacity. The Council-led new footway and cycle lanes along Southbury Road may require relocation of the bus shelter which would be discussed further between LBE Journeys and Places and TfL separately outside this Application.

*Parking*

- *Staff parking*

- 10.131. The Application proposes 145 x staff parking spaces, which sits towards the lower limit of the 70-434 range of the London Plan maximum parking standards. The parking provision has been discussed in detail through the pre-application stage and has been reduced from an original provision of 239 x spaces down to 145 x spaces. The proposed parking provision allows for shifts of FTE employees (470) to changeover with some overlap of parking space occupancy during the operation in 3 x shifts over 24 hours. The provision represents an overall modal share for vehicles of 32%. This is in line with the Mayor's targets set out in the London Plan to reduce dependence of private car.
- 10.132. The proposal also includes commitment to a Travel Plan to ensure a desirable modal shift from cars. This will be secured through the S106 Agreement.
- 10.133. The principle that over 10% of total provision will be blue badge spaces is welcome along with 20% active electric vehicle charging (EVCP) provision. Details will be secured via a condition.

- *Operational Parking*

- 10.134. The proposals also include 52 operational spaces for light goods vehicles (LGVs) and 24 bays within the building for heavy goods vehicles (HGVs). This is considered reasonable to serve 36,554 sq. of proposed operational floorspace. It is also welcomed that all 52 LGV spaces will accommodate EV fast charging (7-22Kw) provision and that the van / cycle shared area will accommodate eight EV fast charging points.

- 10.135. An Outline Car Park Management Plan (CPMP) has been submitted. The Final CPMP would be secured by condition in order to support the mode shift targets in the travel plan - When mode shift targets are not met, the CPMP should allow for the removal of staff parking to encourage further mode shift.

*Vehicular Access and Layout*

- 10.136. The vehicular access will remain from the existing access to the site from Southbury Road, which is part of a junction with Crown Road with proposed widening to allow easier access for HGVs. Offsite upgrades including tactile paving and potential refuge, given the width of the access and the high level of use of the footway by pedestrians (close to buses and Southbury Station) will also be proposed. The Places and Journeys Team confirmed they are acceptable.
- 10.137. The Transport Assessment also includes plans showing additional tracking for HGVs accessing and egressing the site, and manoeuvring within the car park. Tracking has also been provided for refuse vehicles. The Places and Journeys Team confirmed that the proposed layout would be acceptable. Furthermore, proposed security gatehouses are set back further into the site, hence vehicles do not have to stop and potentially queue or overhang the footway.

*Pedestrian and Cyclist Access*

- 10.138. Pedestrian access is shown throughout the site on proposed pedestrian footways and pedestrian crossings over the vehicle access routes.
- 10.139. The main external pedestrian access is from the main entrance, shared with the operational and staff vehicles with a segregated footway and refuge island in the middle of the vehicle access within the Applicant's land ownership.
- 10.140. It is noted that a secondary pedestrian and cyclist access from the new station square would have been more desirable. However, the Applicant has explored this suggestion but considered this unfeasible and unviable mainly due to the site levels and the future operation and maintenance. Other active travel measures as stated in the 'Healthy Street / Active Travel' section below would be secured instead. The Places and Journeys Team have confirmed no objection to the current proposal given the routes through the main access would still provide a safe access route for pedestrians or cyclists.

*Cycle Parking*

- 10.141. During the course of the application, the Applicant has further increased the cycle parking provision. 133 x long stay spaces and 60 x short stay spaces will be provided which meet and exceed London Plan standards respectively. 5% of all provision will be suitable for wider/larger cycles. The Applicant has also clarified that there is a route to the west of the site adjacent to the ramp to access the long stay cycle parking on the south-western part of the Site, keeping cyclists segregated from service yard activity.
- 10.142. A condition has been attached to request details of the bicycle stores to ensure they are sheltered, secured, and provided prior to the first occupation in accordance with DMD Policy 45, Policy T6.1 of The London Plan (2021) and Chapter 8 of the London Cycling Design Standards (LCDS).

- 10.143. Following TfL's comments, the Applicant has clarified that any future cargo bikes will be accommodated within the building and operated in a way similar to other operational vehicles. Since the use of cargo bikes will be dependent on the occupiers of the buildings, which is unknown at this stage, the details will be secured via the CPMP condition.

*Healthy Street / Active Travel*

- 10.144. In order to achieve the desirable mode shift to meet the Mayor's targets set out in the London Plan to reduce dependence of private car, the Applicant is expected to make a financial contribution to deliver walking and cycling infrastructure. At the time of writing this report, the amount of financial contribution is under ongoing discussion with the Applicant and the Places and Journeys Team.
- 10.145. Also, the Applicant has committed to dedicate land to enable the emerging Council-led footway and two way cycle lanes along Southbury Road and potentially an enlarged station square outside the red-line boundary of the Application Site, which may be able to accommodate a new cycle hub to facilitate park-and-ride. Given the concerned land of the enlarged station square between the Applicant Site and the Southbury station is owned by Network Rail and TfL, there has been ongoing discussion on the delivery mechanism with those stakeholders. It is expected that the Applicant would commit to an active travel contribution which could contribute towards the works. This matter would be further discussed with Network Rail and TfL. The delivery of the enlarged public square would be secured by suitably worded S106 obligation.

*Construction logistics (CLP)*

- 10.146. An outline Construction Logistics Plan has been submitted. TfL requested that a full CLP to be conditioned in line with Policy T7 of the London Plan. The full CLP should detail all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus operations are maintained throughout construction in order to support sustainable travel in line with London Plan policies and the Mayor's Vision Zero goal to eliminate deaths and serious injuries from London's transport networks by 2041 and ensure compliance with policy T4 part F of the London Plan which states development proposals should not increase road danger.

*Conclusion on Traffic, Access and Parking*

- 10.147. Overall the Places and Journeys Team and TfL have no objection to the proposed development subject to conditions. The proposed development would not result in conditions prejudicial to the safety and free flow of traffic in the surrounding area. Also, sustainable mode of transport would be promoted through a Travel Plan and improvements of walking and cycling infrastructure in the locality with an active travel financial contribution and dedication of land from the Applicant. Hence, the proposal would comply with Policy T6.1 of the London Plan (2021), Policies CP22 and CP25 of the Enfield Core Strategy (2010) and Policies DMD45 and DMD47 of the Enfield Development Management Document (2014).

Sustainable Design and Construction

*Operational Carbon Emissions*

- 10.148. Policy SI 2 of the London Plan (2021) requires major development to be net zero carbon. A minimum on-site reduction of at least 35% beyond Building Regulations

(2021) is required including unregulated operational emissions. Non-residential development should achieve 15 per cent through energy efficiency measures.

- 10.149. Based on the submitted revised Energy Statement, at the 'Be lean' stage, the proposed development would be able to achieve a 17% reduction by thermally efficient fabric, high performance glazing, reduced air permeability and energy-efficient lighting with appropriate controls and PIR sensors. Upon the request from the GLA Energy Officers, the Applicant has provided further evidence of lighting data sheets confirming the proposed lighting zones efficacy of over 150 lm/W is achievable.
- 10.150. With regard to the 'be clean' stage, the Site is located within Heat Network Priority Area and in close proximity to the Meridian Water Heat Network. London Plan Policy SI 3 (D) of the London Plan (2021) requires major development proposals within Heat Network Priority Areas to have a communal low temperature heating system. The Applicant has engaged with Energetik who have confirmed that they can install the pipework infrastructure to the site boundary and provide a Heat Interface Units for Heat Exchangers to facilitate a DEN connection.
- 10.151. Since the tenants of the proposed buildings are not yet known, the current assessment shows a relatively low demand for space heating and hot water in the proposed buildings, mainly from ancillary offices only. As part of the base build of the main logistics building, the Applicant proposes a Hybrid Variable Refrigerant Flow (HVRF) system for space heating and dedicated Domestic Heat Water (DHW) heat pump for hot water. No Heating, Ventilation, and Air Conditioning (HVAC) will be installed within the main warehouse spaces. The CBS buildings will not be fitted out until the end tenant is known.
- 10.152. To enable the future installation of DEN connections into all the proposed units as and when the demand for thermal energy arise, the routes between the connection points of main logistics and CBS buildings and the future pipe along Southbury Road will be safeguarded. The routes have been confirmed by Energetik. A S106 obligation will be secured to ensure future DEN connections subject to future heat demand from the proposed building, which is supported by the GLA Officers.
- 10.153. At the 'Be Green' stage, the proposed use of air source heat pumps and maximisation of the roof space for photovoltaics would achieve a further 80% of the on-site carbon emissions reduction, resulting in a total saving of 97% of the regulated operational carbon emissions above the Part L (2021). Upon request from the GLA Officers, further details of the proposed DHW heat pumps for the main logistics building and the PV array including capacity (kWp), total net area (m<sup>2</sup>) and annual output (kWh) have been provided. Officers are satisfied that the roof space of the proposed buildings has been maximised for PV array integrating the biodiverse roofs. A condition will request the details of the final heating system of the CBS buildings. All the 'be green' measures will be required to be installed prior to first occupation of the development through condition.
- 10.154. The final Energy Performance Certificate with associated Building Regulations Compliance Report and Display Energy Certificate after practical completion of the building will be secured to ensure compliance of the revised Energy Statement via a condition. Furthermore, the post-occupation energy consumption will be monitored for 5 years in accordance with the London Plan Be Seen Guidance (2021). This will be secured by a 106 obligation.
- 10.155. A financial contribution of £11,606.00 would be secured via the S106 agreement to offset the residual operational carbon emissions against the net zero carbon target.



- 10.156. The Climate Change and Sustainability Team has no objection to the proposed development subject to the above mentioned planning conditions and S106 obligations. Considering the above, it is therefore considered that the proposed development would comply with the energy hierarchy and Policies SI 2 and SI3 of the London Plan (2021).

*Overheating*

- 10.157. An overheating / Thermal Comfort Assessment on both the main logistics building and CBS buildings has been submitted as part of the Energy Statement. Details include passive cooling measures such as locating the skylights on the north-facing sections of the roof of the main logistics building, using solar control glazing, and designing the offices to include natural ventilation if required. The Climate Change and Sustainability Team and GLA Energy Officers have confirmed that the Applicant has demonstrated that the actual building's cooling demand is lower than the notional. A condition will also be attached to ensure compliance. It is therefore considered that the risk of overheating and cooling demand has been minimised broadly in line with the cooling hierarchy of London Plan Policy SI 4.

*Whole Life Carbon Assessment*

- 10.158. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint including the following 4 stages:

- Module A1 – A5 (product sourcing and construction stage)
- Module B1 – B7 (use stage)
- Module C1 – C4 (end-of-life stage)
- Module D (benefits and loads beyond the system boundary)

- 10.159. The applicant has submitted a Whole Life-Cycle Carbon Assessment. In response to the GLA Energy Officer's comments, the Applicant has further amended the GLA Whole Life Carbon Spreadsheet with the baseline elements in line with RICS Guidance. The key proposed actions include reuse of a retaining wall, use of substructure concrete with 30% Ground Granulated Blast Furnace Slag (GGBS)<sup>3</sup> and use of crushed concrete for backfilling, type 1 base and the concrete yard of the proposed Main Logistics building.

- 10.160. As a result of the proposed actions, the proposed development would meet the WLC Benchmark at all modules. Modules A-C (excluding operational energy and water use) is less than 5% higher than WLC Aspirational Benchmark. The Modules B-C is even lower than Aspirational Benchmark. A condition will be attached to request for post construction monitoring report to ensure the compliance of the WLC reduction actions. It is therefore considered that The WLC assessment is in general accordance with London Plan Policy SI2 and the WLC LPG (2022).

*Circular Economy*

- 10.161. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development

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<sup>3</sup> Ground Granulated Blast Furnace Slag (GGBS) is an environmentally friendly product, made from a by-product of iron and steel making

applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG (2022). .

- 10.162. In response to GLA Energy Officers' comments, the Applicant has revised the Circular Economy Statement, completed GLA CE template and supporting evidence including pre-demolition development audit, pre-demolition audit and outline Construction Site Waste Management Plan and Operational Waste Strategy.
- 10.163. The Applicant has fully explored the retrofit options of refurbishment and extensions. The retrofit options were discussed at the first Design Review Panel. Officers are satisfied that the retrofit options are discounted as they would not meet the GLA objectives of achieving industrial intensification and utilising brownfield sites efficiently given the structural limitations of the current foundations which would not be able to support a multi storey warehouse. Furthermore, the existing building does not orientate itself to the site well from a placemaking perspective. The retrofit options would not help address a more positive relationship with Southbury Road.
- 10.164. Embodied carbon of the main structural items has been provided in the revised Pre-Demolition Audit. 96% of the 12,550 tonnes estimated waste will go to reuse, recycle and recovery including 80% of steel to be reused and 20% to be recycled. The estimated embodied carbon (CO<sub>2</sub>e tonnes) would be reduced from 7094.13 CO<sub>2</sub>e tonnes to 4,636 CO<sub>2</sub>e tonnes. In order to maximise the off-site re-use opportunities of the existing materials, the Climate Change Sustainability Team requested the Applicant to use the Excess Materials Exchange (EME). This would be secured by a compliance condition.
- 10.165. The Applicant has also provided additional costs information and demonstrated a commitment to the 20% reused or recycled content target by value for the whole development.
- 10.166. The Operational Waste Strategy satisfactorily demonstrates how 75% business waste recycling target would be met, complying with Policies D3, SI 7 and D6 of London Plan (2021).
- 10.167. The Circular Economy Statement shows an example of how the building has been planned in relation to the cores to provide a flexible footprint for subdivision and also how it could potentially be converted to other uses in the future.
- 10.168. A condition will be attached to request a postconstruction report to ensure delivery of all the proposed waste minimisation measures.

#### *BREEAM*

- 10.169. A Sustainability Statement including a Design Stage BREEAM Pre-Assessment and Water Efficiency Calculation has been submitted. It demonstrates that the proposed development would meet the 'Excellent' rating with target scores of 71.31% and 71.25% for the proposed CBS buildings and main logistics building respectively. Both scores are lower than the target of 85% to achieve 'Outstanding' rating as recommended by Policy 50 of DMD (2014).
- 10.170. The Design Stage BREEAM Pre-Assessment shows a minimum of 5 out of 7 credits under MAT 1 (life cycle impact assessment) and a minimum of 4 out of 4 credits under MAT 3 (Responsible sourcing of materials). The targets of these two elements are met as required Policy 57 of DMD (2014).

- 10.171. The proposed development would target a 65% improvement in water efficiency over notional baseline for the 'Wat 01' water category through water efficient sanitaryware specification, complying with the Policy 58 of DMD (2014) and SI 5 of London Plan (2021)
- 10.172. Despite the deviations from the overall BREEAM target recommended by Policy 50 of DMD (2014), the Applicant will strive to achieve BREEAM outstanding. Furthermore, the Applicant has demonstrated commitments to sustainable design and construction in other regards (see the above sections). On balance, it is therefore considered that the BREEAM performance of the proposed development is acceptable at this stage in this instance. A condition has been attached to seek design stage and post construction assessments.

#### Fire Safety

- 10.173. Policy D12 of the London Plan states that major applications should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further to the above, Policy D5 (B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users, with fire evacuation lifts suitable to be used to evacuate people who require level access from the buildings.
- 10.174. A Fire Statement has been submitted and illustrates how provisions have been made for the safety of occupants as well as the provision of suitable access and provisions for firefighting considering the London Plan's fire safety policy requirements and the rationale for these measures. The Building Control Team has reviewed the Fire Statement and confirmed no objection. In response to GLA Officers' comments in relation to the green wall, a revised Fire Statement has been submitted to illustrate the measures to ensure fire safety in section 5.2 of the revised Fire Statement. A condition will be attached to ensure compliance of the Fire Statement. Having regard to the above, it is considered that the proposed fire safety arrangements are acceptable subject to condition.

#### Air Quality

- 10.175. Policy SI 1 (Improving Air Quality) of the London Plan states that any development proposal should not lead to further deterioration of existing poor air quality and not be located or operated in a manner that would subject vulnerable people to poor air quality.

#### Construction

- 10.176. The submitted Air Quality Assessment assesses the dust impacts and demolition and construction traffic impacts on the sensitivity receptors. Dust control measures are proposed at the site during the various stages of redevelopment of the site. The Environmental Health Officer has confirmed no objection subject to compliance to the dust control measures and restrictions on the emissions from all non-road mobile machinery during demolition and construction. The final Construction Management Plan will also be secured via a condition.

*Operational*

- 10.177. Concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> have been predicted at worst-case locations representing existing properties adjacent to the road network. Predicted concentrations are below the relevant objectives at all the existing receptor locations with the proposed development in place. Whilst the scheme, based on these worst case assumptions, is currently not 'air quality neutral' when compared to the transport emission benchmark, the Environmental Health Officer has confirmed the mitigation measures set out in the Air Quality Assessment to reduce vehicle trips would be sufficient to mitigate against the worst case of 51,290 additional annual trips from the development over the total benchmark trip rate. This would be secured through a compliance condition. It is therefore considered that the proposed development would comply with Policy SI 1 of London Plan (2021).

Land Contamination

- 10.178. The submitted Preliminary Risk Assessment and Ground Investigation Report together with a Note on Ground Investigations show that there are ground contaminants that pose a risk to human health at the site which require remediation and further investigation. The Environmental Health Officer confirmed that the proposed development is unlikely to result in adverse land contamination subject to an acceptable scheme to deal with the contamination of the site, which would be secured by a planning condition.

Health Impact Assessment

- 10.179. London Plan Policy GG3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to outlined criteria.
- 10.180. An assessment of the potential health effects of the proposed development has been undertaken using the NHS London Healthy Urban Development Unit (HUDU) Checklist (2017) and rapid HIA tool (2019). Officers consider that the proposed development would comply with Policy GG 3 subject to the implementation of the recommendations of the assessment including ongoing public engagement to support opportunities for voluntary and community sectors as these organisations can offer invaluable services supporting community wellbeing and health that are not addressed by the state or private sector. A compliance condition is therefore attached to ensure compliance to the Health Impact Assessment.

Digital Connectivity

- 10.181. As requested by the GLA Officers, a planning condition is recommended requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Community Infrastructure Levy (CIL)

*Mayoral CIL*

- 10.182. 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 £60per sqm as of 1st April 2019). The estimated CIL liability is £1,175,437.27.

*Enfield CIL*

- 10.183. The Council introduced its own CIL on 1st April 2016. The proposed uses of the Main Logistics building (Use Classes E(g)(iii), B2 and B8) have a charging rate of £0. Given the sub-classes (a,b,c) within Class E have a charging rate of £60. Unless the Applicant accepts a restriction on the future changes of the CBS, it is likely that the proposed uses of the CBS building (Use Classes E, B2 and B8) will be CIL liable. The estimated CIL liability is £76,443.23.
- 10.184. The estimated Mayoral and Enfield CIL liabilities above have been calculated using the Exacom public CIL calculator. CIL liability may change and would be confirmed by the CIL team at the point of issuing the CIL liability Notice..

S106 Heads of Terms

- 10.185. The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within the S106 Agreement

<b>Heads of Term</b>	<b>Description</b>	<b>Sum</b>
Transport	Active travel contribution	TBC
	Dedication of land for future walking and cycling infrastructure	N/A
	Travel Plan	TBC
Climate change	Carbon offset fund contribution	£11,606.00
	Be-seen monitoring	N/A
	District Heat Network connection strategy	N/A
Public realm	Delivery of new public square	N/A
	Public arts strategy	N/A
Employment and skill strategy	Employment and skill strategy	N/A
	Considerate Construction Scheme	N/A
Design	Retention of architect	N/A
S106 monitoring fees	5 per cent of the total value of all contributions; and A fixed charge to manage non-monetary obligations of £350 per head of term	

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

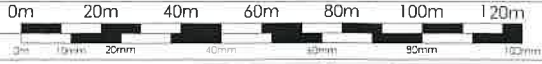
- 11.1. Pursuant to the Equality Act 2010, an equalities impact assessment has been undertaken. It is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

## **12. Conclusion**

- 12.1. The starting point for the determination of any planning application is the development plan. Paragraph 11(c) of the NPPF provides development proposals which accord with an up to date development plan should be approved without delay, and 11 (d) of the NPPF states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, 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".
- 12.2. It is considered the application proposes a high-quality employment development on existing underutilised, sustainable brownfield land within the highly sustainable location within designated SIL, which is consistent with the objectives of the adopted planning policy. The applicant has engaged with the LPA in undertaking extensive pre-application advice inclusive of the development being presented to the Enfield Design Review Panel. The pre-application process involved the applicant considering design options to determine the most appropriate forms of development, and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 12.3. The massing and layout of the proposed buildings have been sensitively designed to minimise impacts on the heritage assets and townscape. Given the incorporation of the lower CBS buildings fronting Southbury Road with high quality materials and detailed façade treatment, together with the delivery of substantial public realm and landscape improvements to Southbury Road, including a new station square and a new tree-lined frontage, on balance, the proposal would not result in a harm on the immediate setting of the Grade II listed 'Ripaults Factory' and Locally Listed Southbury Station.
- 12.4. The proposed scheme would result in some adverse and noticeable reductions in daylight to some residential properties on Poppy Drive. However, consideration should be given to the particular design characteristics and internal layouts of these residential properties, to the fairly minimal existing massing on the Application site, which is unusual in an urban context, and to the SIL designation of the Application Site where industrial intensification is supported by the London Plan. It is also reasonable to consider the identified effects alongside the planning merits of the scheme overall. The proposal would not result in adverse impact on the sunlight and overshadowing. In conclusion, Officers consider that when balancing the overall impact of the scheme in terms of daylight, sunlight and overshadowing with the many planning benefits that the scheme would deliver, the overall balance weighs in favour of the proposal. The proposal would not result in any adverse impact on the neighbouring amenities in terms of noise, light spill and solar energy generation.

- 12.5. In addition, as well as being low carbon, energy efficient, sustainable and safe, care has been given to ensure that the proposal would not harm the trees with significant amenity value and local wildlife. Sustainable drainage, landscape and biodiversity enhancement would be secured including 193 new trees, 718m of native hedgerow, green walls and green roofs which would achieve an Urban Greening Factor of 0.22 and Biodiversity Net Gain of 442.65% (area based) and 100% (linear based). There is also no adverse effect on the free flow and safety of traffic or highway safety. Sustainable modes of transport will also be promoted.
- 12.6. It is concluded that the development for reasons set-out within this report, is acceptable and broadly accords with the policies of the Development plan where they are material to the development and other relevant material planning considerations including emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule, and within the Section 106 Agreement, the application is recommended for approval.

ENFIELD: HERITAGE HOUSE  
 SITE LOCATION PLAN - SCALE 1:1250 @ A3  
 SCALE 1:1250  
 SCALE 1:1



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**KEY**

Application Boundary  
 4.75 [ha] / 11.74 [acres]

Project File	Southbury Road Logistics Hub		
	345 SOUTHBURY RD EN1 1TW ENFIELD		
Client	BL Logistics Investment Limited		
Status	Planning		
Scale	1:1250	Drawing Size	A3
Date	10.03.23	Drawn By	AS
		Checked	JW

Rev	Date	Description	Rev'd	Chk'd by

Drawing Title: **Site Location Plan**

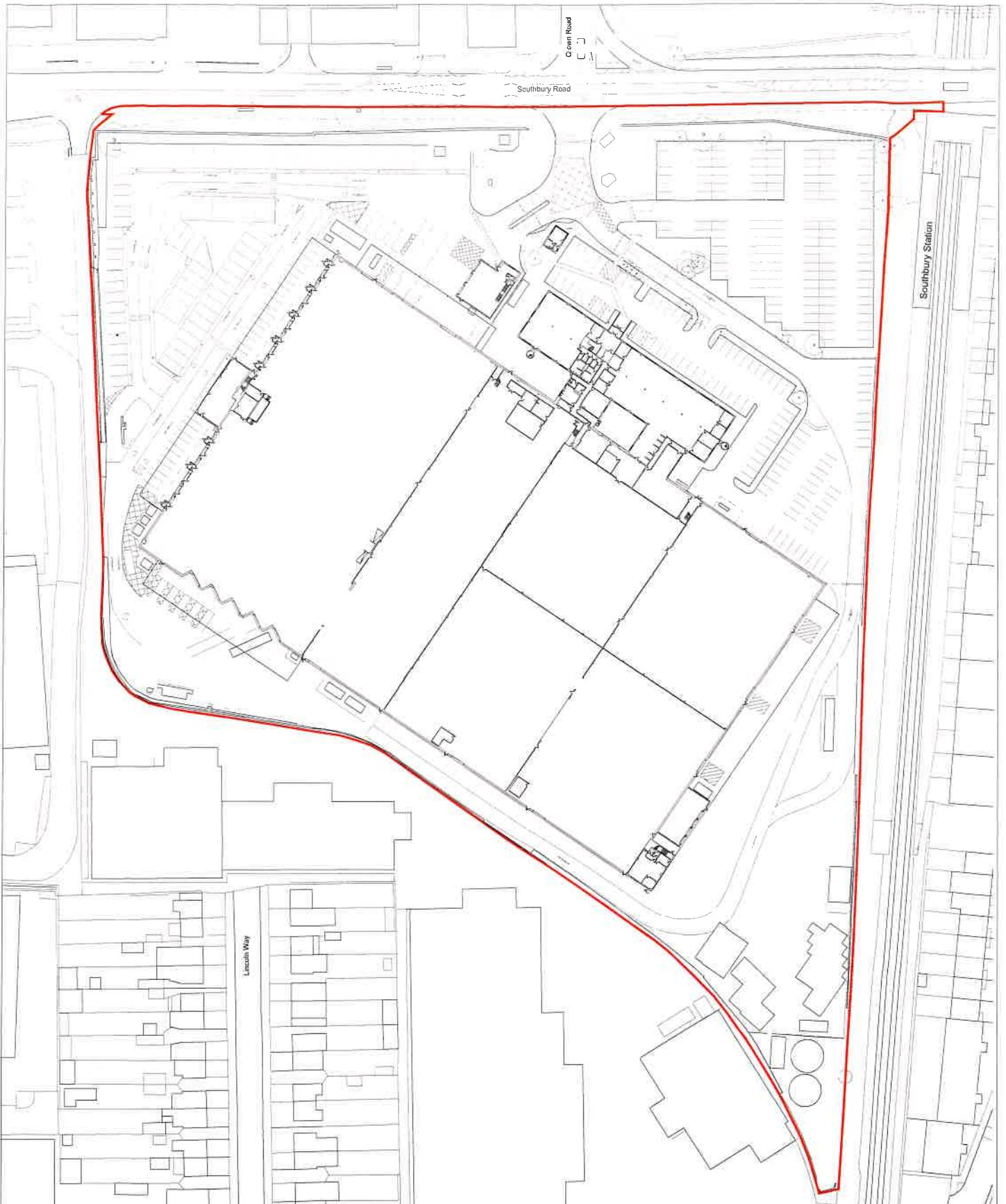
Job/Draw No: **17531-100**

- 2 St. Johns North, Wakefield, WF1 3QA, t. 01924 291800
- Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG, t. 01602 211577
- The Old Rectory, 79 High Street, Liverpool, L3 1JL, t. 0151 207700
- 131 London Road, Reading, RG1 1JL, t. 0118 9507700
- 10 Great Court, St Christophers Place, London, W1U 1JJ, t. 0207 4091215



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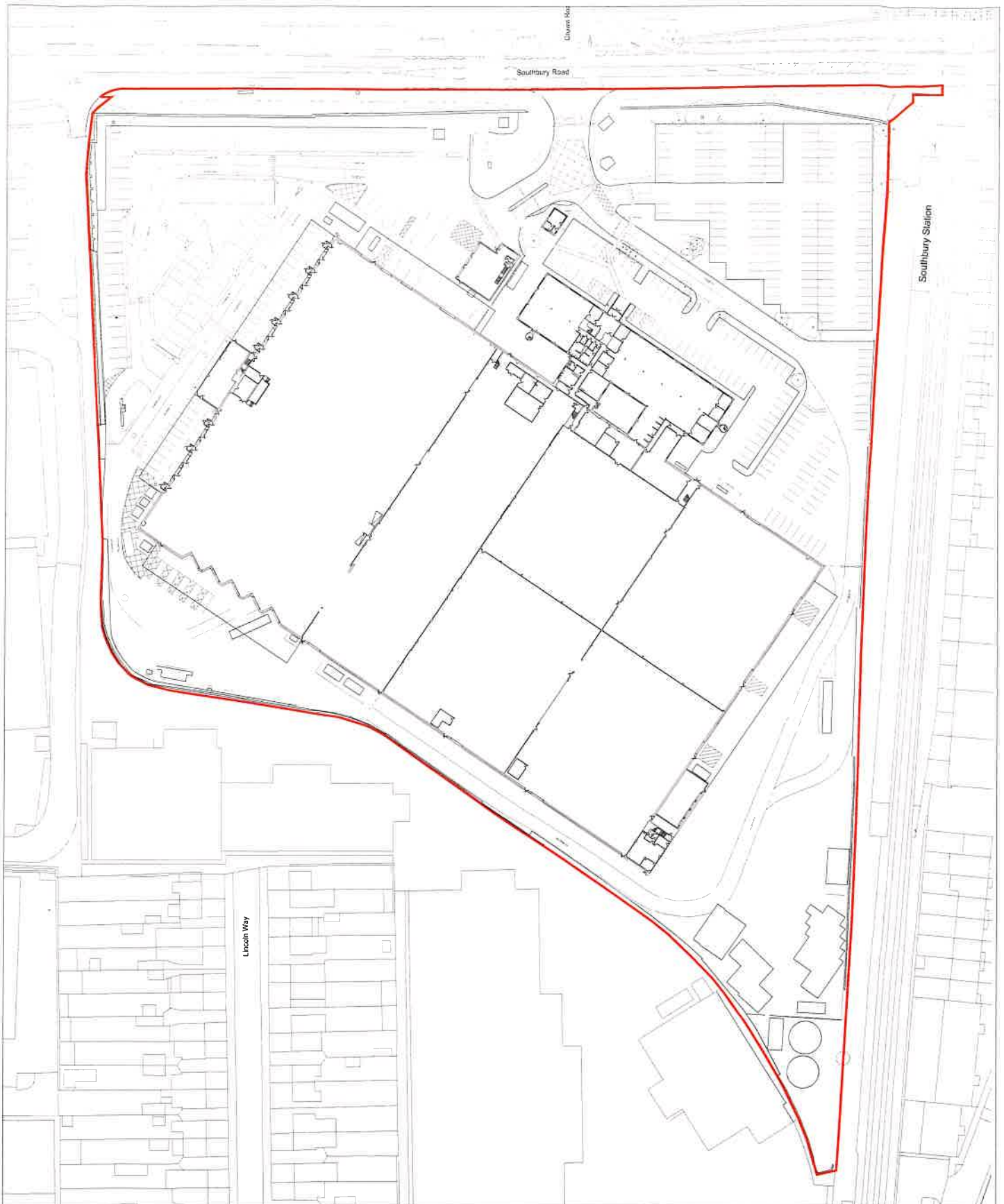
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Note:  
 Drawn to received topographical and measured building survey information by Greenhatch Group Surveyors

CAD FILE REFERENCE

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Client	Heritage House Southbury Enfield EN1 1TP	Project Title	Existing Block Plan
Company	Bl Logistix Investment Limited	Project Manager	
Discipline	Planning	Project Engineer	
Scale	1:500	Project Architect	
Date	10.03.2023	Drawn By	JW



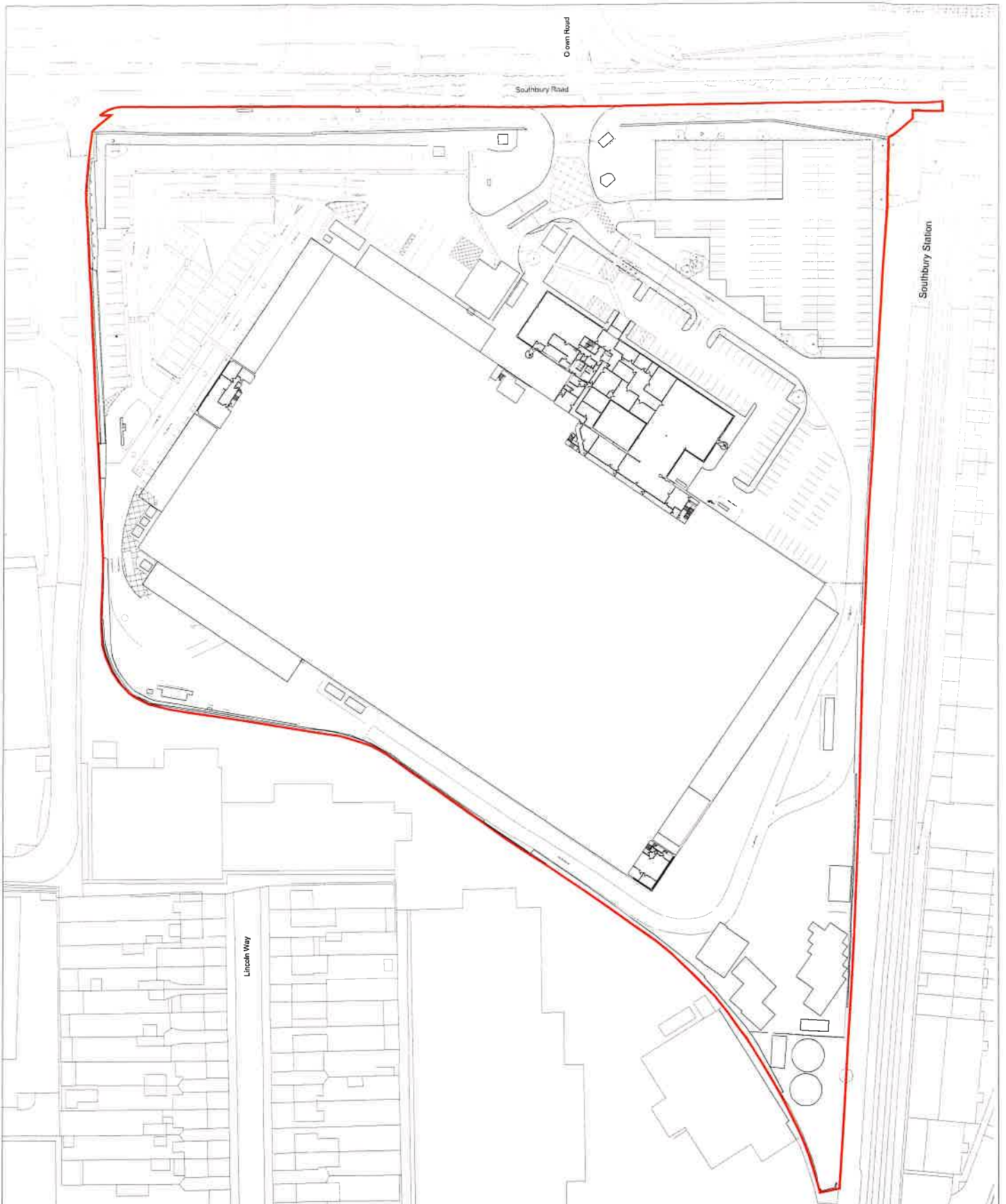


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Note:  
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Project Name	Southbury Road Logistics Hub	Drawing No.	Existing Ground Floor Plan
Location	Heritage House Southbury Enfield BN1 1JH	Reference	17531 - 102
Client	BL Logistics Investment Limited	Scale	1:500
Discipline	Planning	Author	AL
Date	10.03.2023	Check	JPR
Drawn by	AL	Project No.	17531





**KEY:**  
— Redline: Application Site Boundary

**Note:**  
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<b>Project</b> Southbury Road Logistics Hub Heritage House Southbury Enfield EN1 1NP		<b>Drawing No.</b> Existing First Floor Plan 17531 - 103	
<b>Client</b> BL Logistics Investment Limited		<input type="checkbox"/> 1:100 <input type="checkbox"/> 1:200 <input type="checkbox"/> 1:500 <input type="checkbox"/> 1:1000 <input type="checkbox"/> 1:2000 <input type="checkbox"/> 1:5000 <input type="checkbox"/> 1:10000	
<b>Planning</b> 1:500 10.03.2023		<input type="checkbox"/> 1:1000 <input type="checkbox"/> 1:2000 <input type="checkbox"/> 1:5000 <input type="checkbox"/> 1:10000	





**KEY:**  
— Redline: Application Site Boundary

*Note:*  
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Project Name	Southbury Road Logistics Hub	Drawing No.	Existing Separated Floor Plan
Client	HL Logistics Hub Southbury 101-104 S14 1LP	Reference	17531 - 104
Client	HL Logistics Investment Limited	Scale	1:500
Discipline	Planning	Author	AW
Scale	1:500	Checked	WV
Date	10 03 2023	Drawn	AW



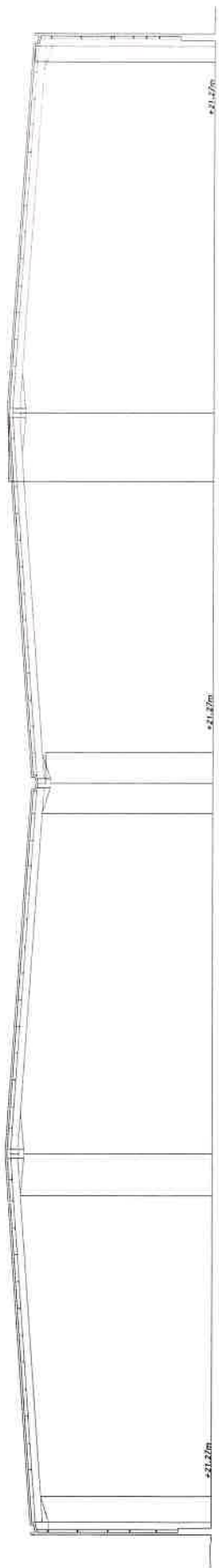


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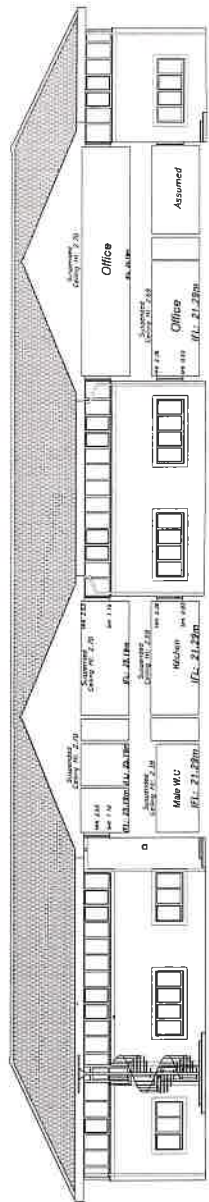
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 survey information by Greenhalgh Group Surveyors

Project No	Southbury Road Logistics Hub	Drawing No	Existing Pool Plan
Client	Heritage House Southbury Enfield EN1 1NP	Reference	17531 - 105
Design	BL Logistics Investment Limited	Scale	1:500
Discipline	Planning	Author	AV
Issue	10 03 2023	Check	JW

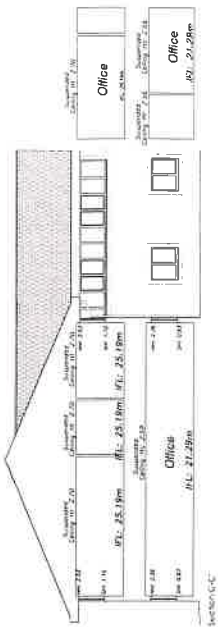




Section A-A



Section B-B



Project Information:

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Client: /FSU - 106

Scale: 1:50

Author: /FSU - 106

Check: /FSU - 106

Issue: /FSU - 106

Project Location: /FSU - 106

Project Date: /FSU - 106

Project Status: /FSU - 106

Project Description: /FSU - 106

Project Notes: /FSU - 106

Project References: /FSU - 106

Project Contacts: /FSU - 106

Project Documents: /FSU - 106

Project Files: /FSU - 106

Project Images: /FSU - 106

Project Models: /FSU - 106

Project Reports: /FSU - 106

Project Drawings: /FSU - 106

Project Specifications: /FSU - 106

Project Standards: /FSU - 106

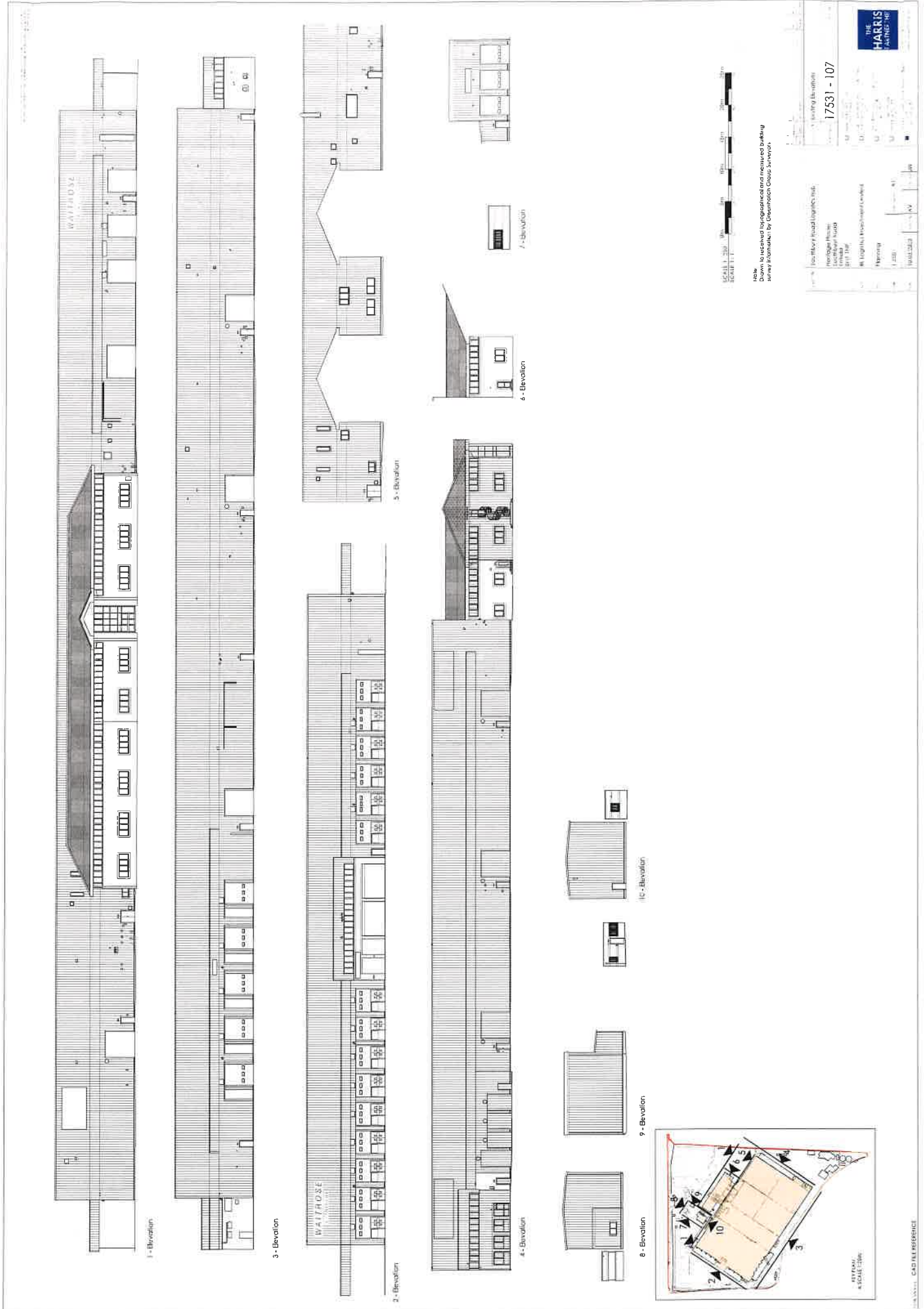
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Project Regulations: /FSU - 106

Project Standards: /FSU - 106

Project Codes: /FSU - 106

Project Regulations: /FSU - 106



1 - Elevation

3 - Elevation

2 - Elevation

5 - Elevation

4 - Elevation

6 - Elevation

7 - Elevation

8 - Elevation

10 - Elevation

9 - Elevation

BYWDM  
SCALE 1:500

1:200000 CAD FILE REFERENCE

SCALE 1:200  
SCALE 1:1000

Note:  
Drawn to received topographical and measured building  
survey information by Greenmatch Group Surveyors.

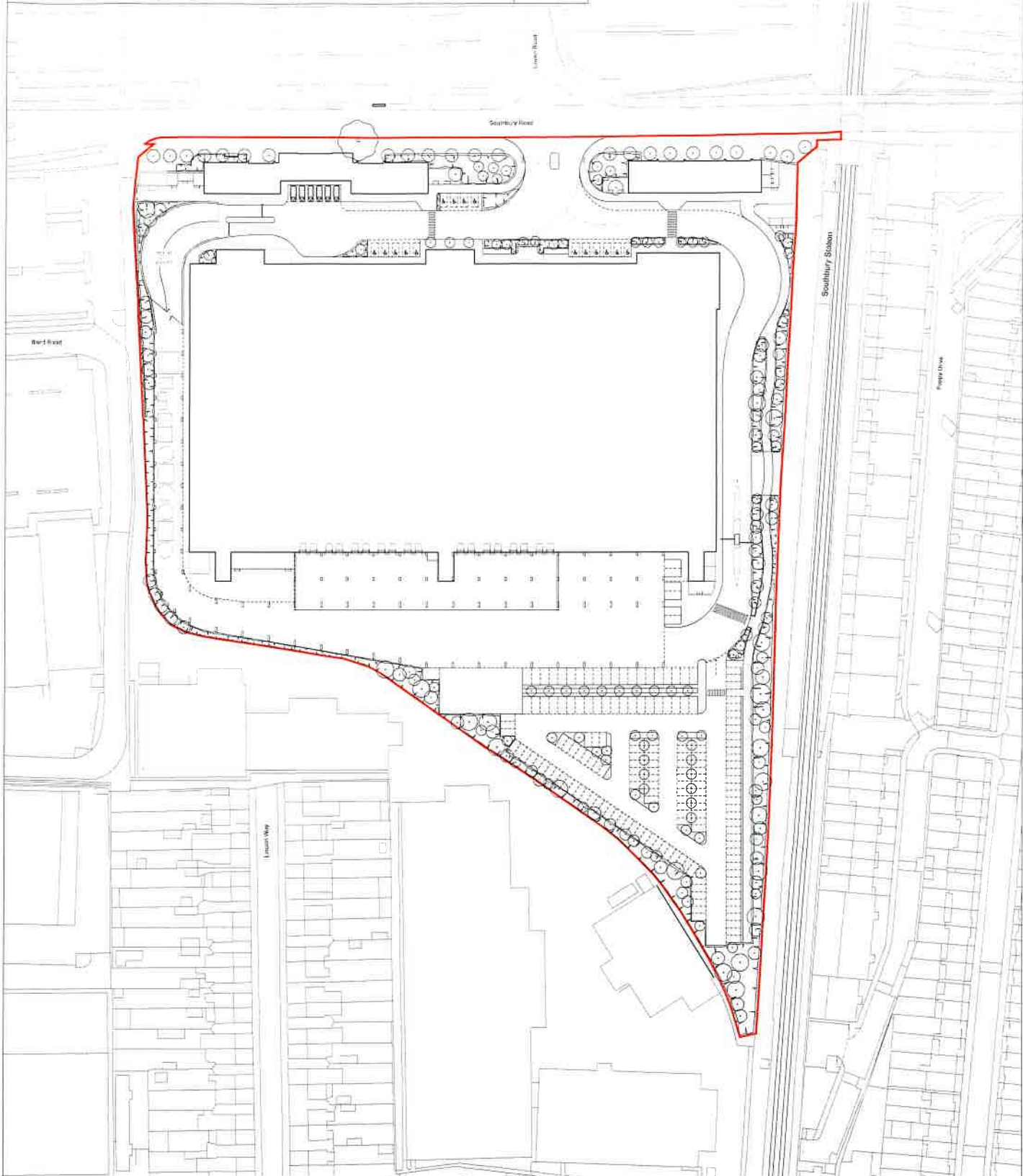
17531 - 107  
Logistics Group  
17531 - 107  
17531 - 107  
17531 - 107



ENFIELD HERITAGE HOUSE  
 PROPOSED BLOCK PLAN - SCALE 1:1250 @ A3

SCALE 1 : 1250  
 SCALE 1 : 1

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Rev	30.06.23	Amendments to cycle parking	AV	JW
Rev	22.03.23	Amendments to landscaping	AV	JW
Rev	Date	Description	Rev By	Chk'd By

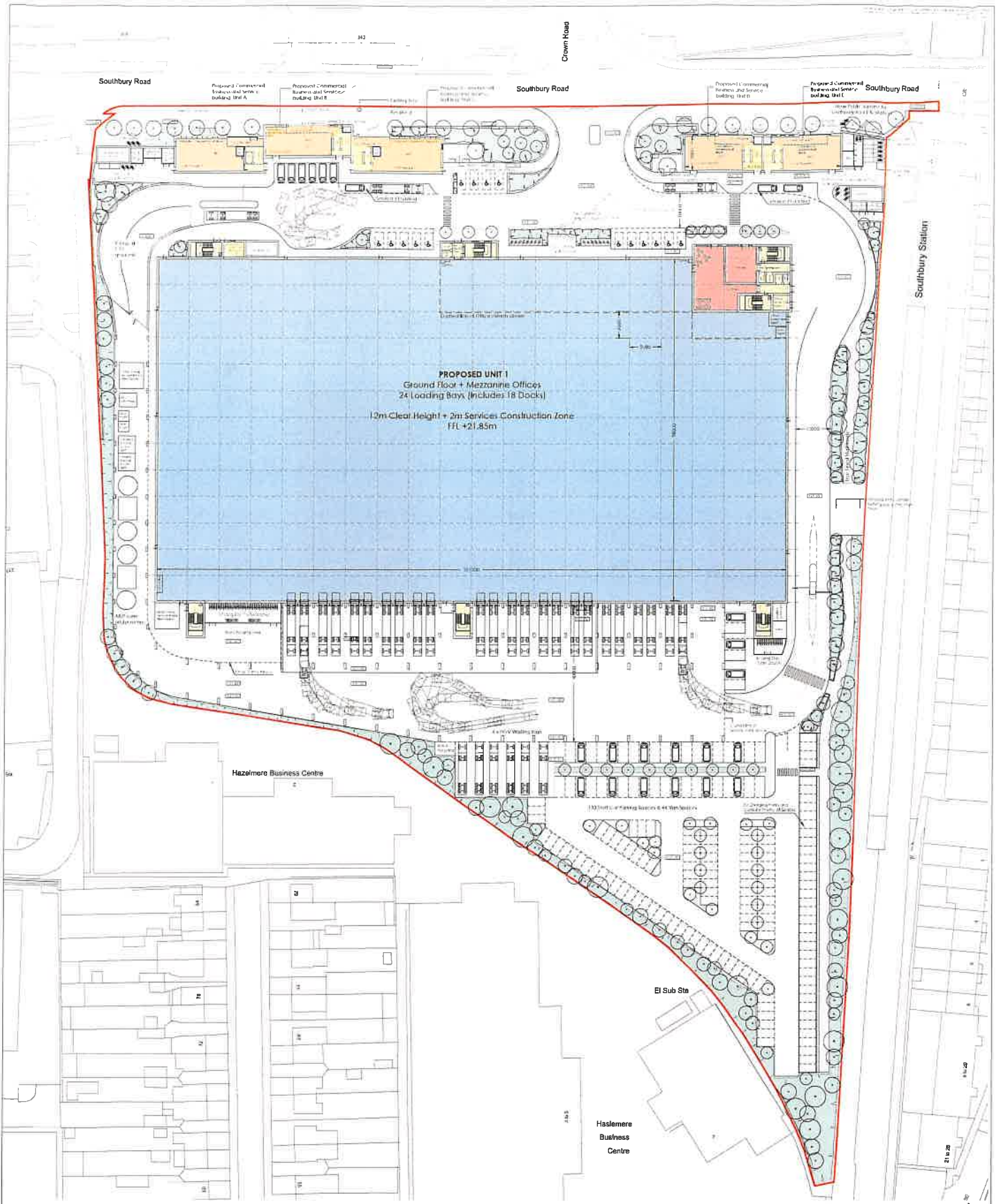
**KEY**  
 Application Boundary  
 4.75 [ha] / 11.74 [acres]

Project file	Southbury Road Logistics Hub		
	345 SOUTHBURY RD EN1 1TW ENFIELD		
Client	BL Logistics Investment Limited		
Stage	Planning		
Scale	1:1250	Drawing Size	A3
Date	10.03.2023	Drawn By	AS
		Checked By	JW

Drawing file: Proposed Block Plan  
 Job-Dwg file: 17531-119 Rev: B

- 231 Johns North, Wakefield, W61 3QA, T. 01924 291800
- Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG, T. 0161 2386355
- The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB, T. 01908 211577
- 101 London Road, Reading, RG1 3BY, T. 0118 9207700
- 10 Green Court, St Christophers Place, London, W1U 1JJ, 0207 4291215



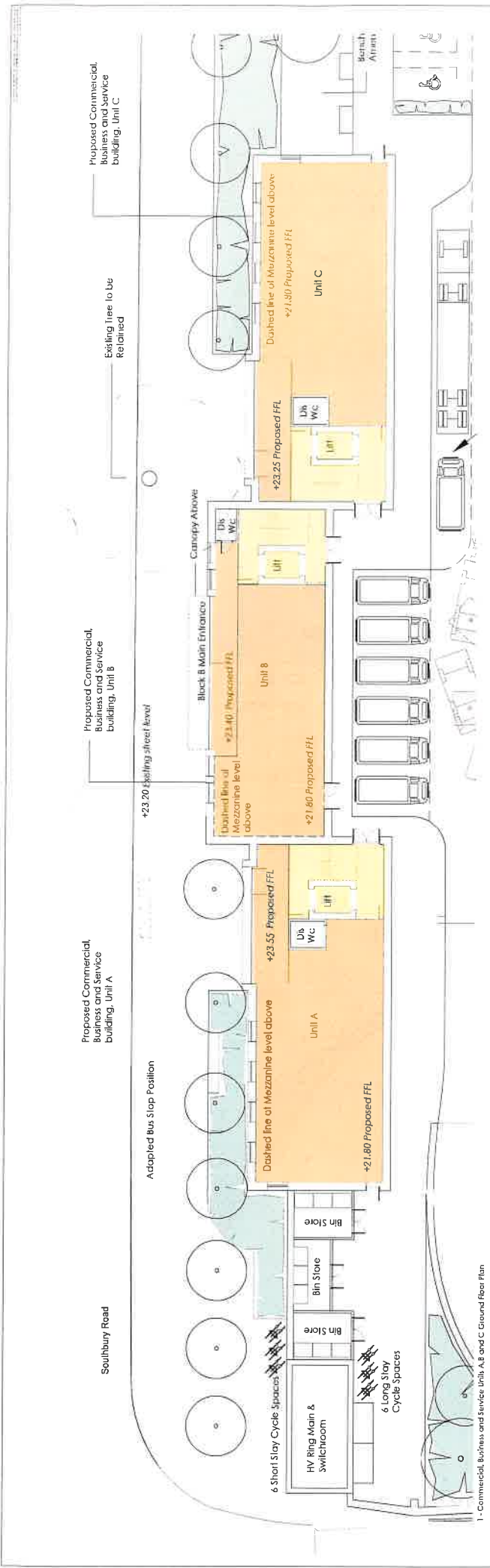


KEY:	
Parking	145 spaces (incl. 15 Acc.)
Car Sharing Priority	5% allocation (8 spaces)
EVs	20% allocation (30 spaces)
Van Parking	52 spaces
*Includes on-site service bay	
Bicycle Parking	193 spaces (incl. 10 Acc.)
Docks	24 Loading Docks (18 docks 6 level doors)
--- Redline Application Entry	
HDV Vehicle: 9.2m long turn	
HDV Vehicle Turning Space	
	Logistics Space
	Circulation Space
	Office Space
	Commercial Business and Service Buildings
	Amenity Space (incl. person or enclosure & toilet)
<b>Note</b> Entrance to offices, subject to tenants requirements and detailed design. Cares to be shared, access controlled. Columns indicative, subject to structural engineers advice	

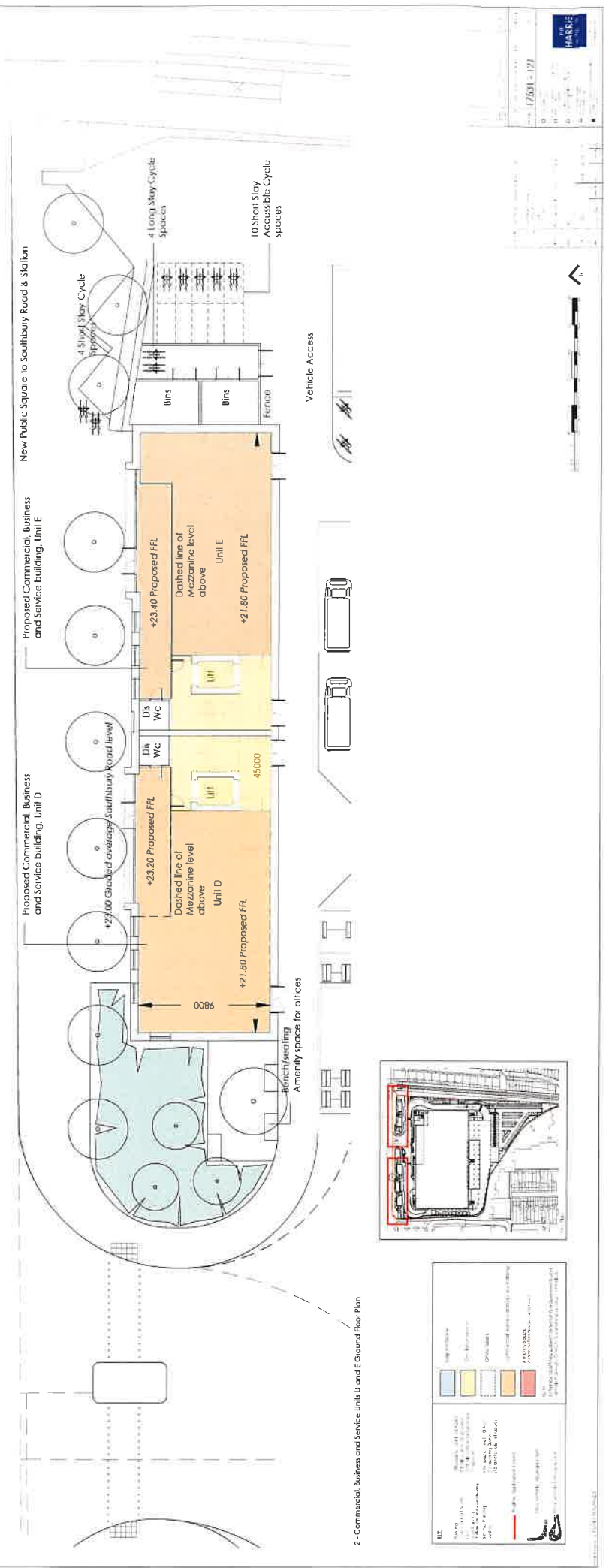
Project Name	Southbury Road Logistics Hub
Client	Heritage House Southbury Road Enfield EN1 1NP
Client Contact	BT Logistics Investment Limited
Phase	Planning
Scale	1:500
Date	10/03/2023
Drawn by	04/10/2022
Checked by	04/10/2022
Approved by	04/10/2022

21' units turn  
 15' units turn  
 10' units turn  
 5' units turn  
 10' units turn  
 15' units turn  
 20' units turn  
 25' units turn  
 30' units turn  
 35' units turn  
 40' units turn  
 45' units turn  
 50' units turn  
 55' units turn  
 60' units turn  
 65' units turn  
 70' units turn  
 75' units turn  
 80' units turn  
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 190' units turn  
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 235' units turn  
 240' units turn  
 245' units turn  
 250' units turn  
 255' units turn  
 260' units turn  
 265' units turn  
 270' units turn  
 275' units turn  
 280' units turn  
 285' units turn  
 290' units turn  
 295' units turn  
 300' units turn

17531 - 120  
 THE HARRIS PARTNER™  
 ARCHITECTS



1 - Commercial, Business and Service Units A, B and C Ground Floor Plan



2 - Commercial, Business and Service Units D and E Ground Floor Plan

LEG

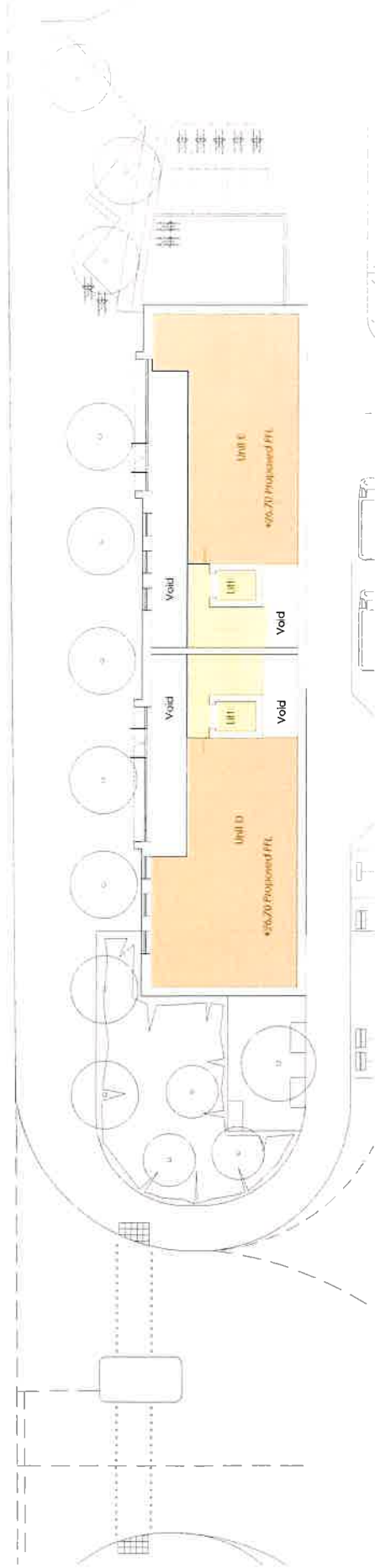
High Pressure Water	Proposed Building, Commercial, Business and Service Units A, B and C
Low Pressure Water	Proposed Building, Commercial, Business and Service Units D and E
Sanitary Sewer	Proposed Building, Commercial, Business and Service Units A, B and C
Storm Sewer	Proposed Building, Commercial, Business and Service Units A, B and C
Proposed Access Road	Proposed Building, Commercial, Business and Service Units A, B and C
Proposed Cycle Spaces	Proposed Building, Commercial, Business and Service Units A, B and C
Proposed Bus Stop Position	Proposed Building, Commercial, Business and Service Units A, B and C
Proposed Public Square	Proposed Building, Commercial, Business and Service Units A, B and C
Proposed Vehicle Access	Proposed Building, Commercial, Business and Service Units A, B and C



Southbury Road



1 - Commercial, business and service Units A, B, and C, Mezzanine Floor Plan.



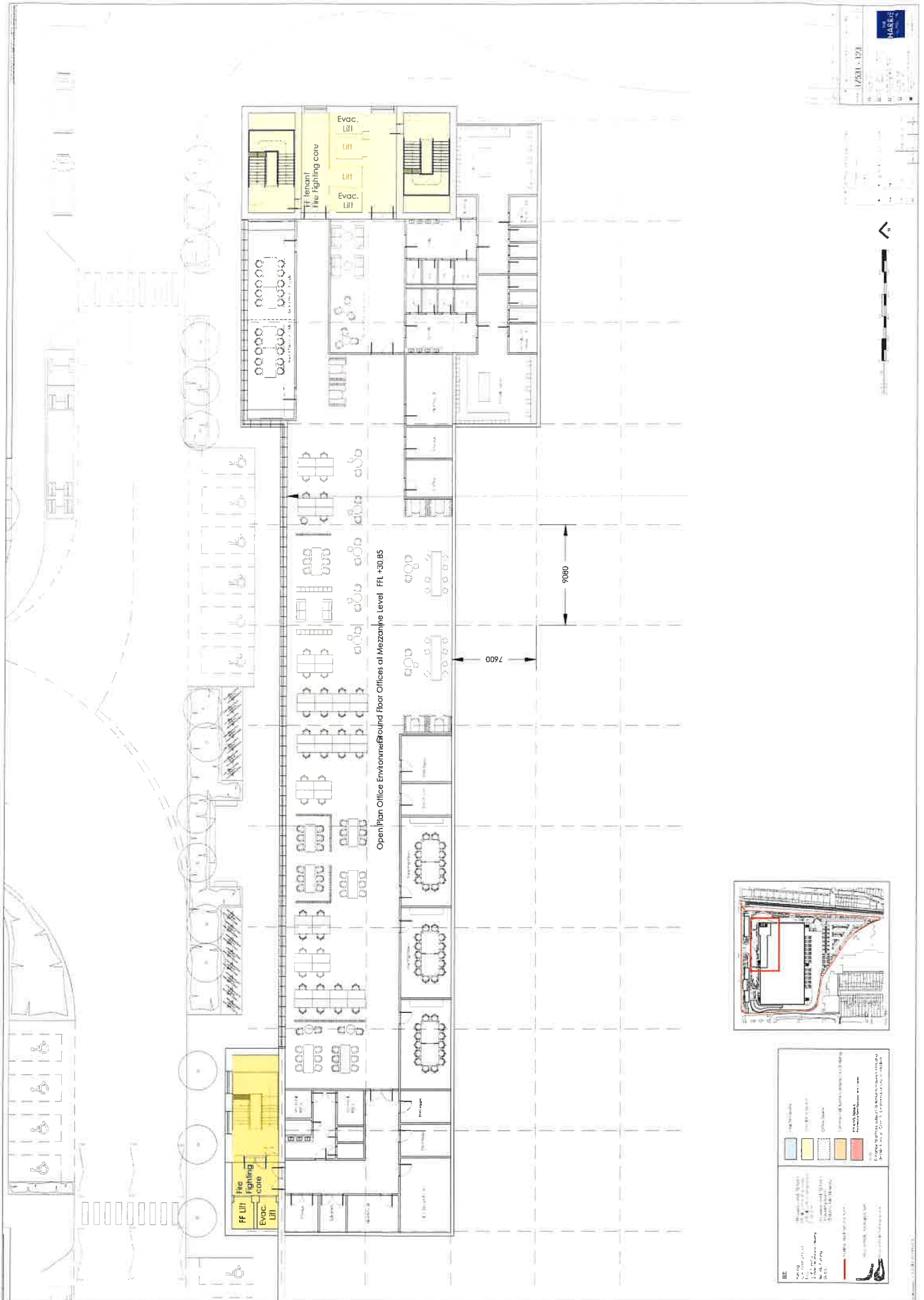
2 - Commercial, business and service Unit D, E and Mezzanine Floor Plan



**LEGEND**

- Unit 1A, Unit 1B, Unit 1C
- Unit 1D, Unit 1E, Unit 1F
- Unit 1G, Unit 1H, Unit 1I
- Unit 1J, Unit 1K, Unit 1L
- Unit 1M, Unit 1N, Unit 1O
- Unit 1P, Unit 1Q, Unit 1R
- Unit 1S, Unit 1T, Unit 1U
- Unit 1V, Unit 1W, Unit 1X
- Unit 1Y, Unit 1Z, Unit 1AA
- Unit 1AB, Unit 1AC, Unit 1AD
- Unit 1AE, Unit 1AF, Unit 1AG
- Unit 1AH, Unit 1AI, Unit 1AJ
- Unit 1AK, Unit 1AL, Unit 1AM
- Unit 1AN, Unit 1AO, Unit 1AP
- Unit 1AQ, Unit 1AR, Unit 1AS
- Unit 1AT, Unit 1AU, Unit 1AV
- Unit 1AW, Unit 1AX, Unit 1AY
- Unit 1AZ, Unit 1BA, Unit 1BB
- Unit 1BC, Unit 1BD, Unit 1BE
- Unit 1BF, Unit 1BG, Unit 1BH
- Unit 1BI, Unit 1BJ, Unit 1BK
- Unit 1BL, Unit 1BM, Unit 1BN
- Unit 1BO, Unit 1BP, Unit 1BQ
- Unit 1BR, Unit 1BS, Unit 1BT
- Unit 1BU, Unit 1BV, Unit 1BW
- Unit 1BX, Unit 1BY, Unit 1BZ
- Unit 1CA, Unit 1CB, Unit 1CC
- Unit 1CD, Unit 1CE, Unit 1CF
- Unit 1CG, Unit 1CH, Unit 1CI
- Unit 1CJ, Unit 1CK, Unit 1CL
- Unit 1CM, Unit 1CN, Unit 1CO
- Unit 1CP, Unit 1CQ, Unit 1CR
- Unit 1CS, Unit 1CT, Unit 1CU
- Unit 1CV, Unit 1CW, Unit 1CX
- Unit 1CY, Unit 1CZ, Unit 1CA
- Unit 1CB, Unit 1CC, Unit 1CD
- Unit 1CE, Unit 1CF, Unit 1CG
- Unit 1CH, Unit 1CI, Unit 1CJ
- Unit 1CK, Unit 1CL, Unit 1CM
- Unit 1CN, Unit 1CO, Unit 1CP
- Unit 1CQ, Unit 1CR, Unit 1CS
- Unit 1CT, Unit 1CU, Unit 1CV
- Unit 1CW, Unit 1CX, Unit 1CY
- Unit 1CA, Unit 1CB, Unit 1CC
- Unit 1CD, Unit 1CE, Unit 1CF
- Unit 1CG, Unit 1CH, Unit 1CI
- Unit 1CJ, Unit 1CK, Unit 1CL
- Unit 1CM, Unit 1CN, Unit 1CO
- Unit 1CP, Unit 1CQ, Unit 1CR
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- Unit 1CY, Unit 1CZ, Unit 1CA
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- Unit 1CE, Unit 1CF, Unit 1CG
- Unit 1CH, Unit 1CI, Unit 1CJ
- Unit 1CK, Unit 1CL, Unit 1CM
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- Unit 1CQ, Unit 1CR, Unit 1CS
- Unit 1CT, Unit 1CU, Unit 1CV
- Unit 1CW, Unit 1CX, Unit 1CY
- Unit 1CA, Unit 1CB, Unit 1CC
- Unit 1CD, Unit 1CE, Unit 1CF
- Unit 1CG, Unit 1CH, Unit 1CI
- Unit 1CJ, Unit 1CK, Unit 1CL
- Unit 1CM, Unit 1CN, Unit 1CO
- Unit 1CP, Unit 1CQ, Unit 1CR
- Unit 1CS, Unit 1CT, Unit 1CU
- Unit 1CV, Unit 1CW, Unit 1CX
- Unit 1CY, Unit 1CZ, Unit 1CA
- Unit 1CB, Unit 1CC, Unit 1CD
- Unit 1CE, Unit 1CF, Unit 1CG
- Unit 1CH, Unit 1CI, Unit 1CJ
- Unit 1CK, Unit 1CL, Unit 1CM
- Unit 1CN, Unit 1CO, Unit 1CP
- Unit 1CQ, Unit 1CR, Unit 1CS
- Unit 1CT, Unit 1CU, Unit 1CV
- Unit 1CW, Unit 1CX, Unit 1CY





**LEG**

- FF Lift fire fighting car
- Evac. Lift
- Open Plan Office Environment
- Conference Room
- Printer
- Meeting Room
- Staircase
- Elevator
- FF tenant fire fighting cars

**Color Legend:**

- Blue: FF Lift fire fighting car
- Yellow: Evac. Lift
- Light Blue: Open Plan Office Environment
- Light Green: Conference Room
- Light Purple: Meeting Room
- Light Orange: Staircase
- Light Grey: Elevator
- Light Red: FF tenant fire fighting cars

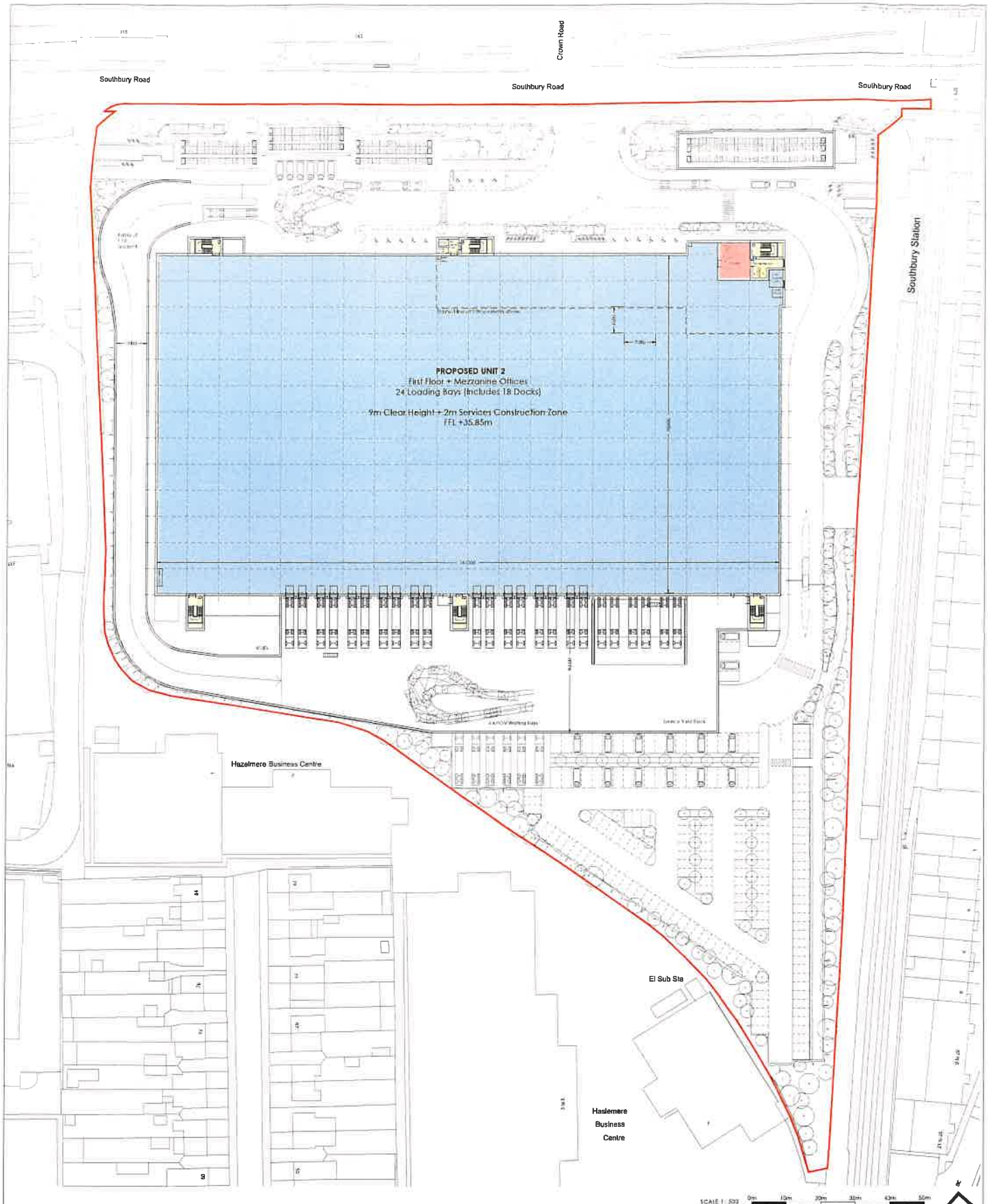
**Scale:** 1:1000

**North Arrow:** (Symbol pointing up)

**Inset Site Plan:** (Symbol showing building location)

1/23/2011 12:31

MARK 12



**KEY:**

Parking	145 spaces (incl. 15 Acc.)	Logistics Space
Car Sharing Priority	5% allocation (8 spaces)	Circulation Space
EVC	20% allocation (30 spaces)	Office Space
Van Parking	52 spaces	Commercial Business and Service Buildings
(Electric vehicle service-battery)		Amenity Space
Bicycle Parking	193 spaces (incl. 10 Acc.)	
Docks	24 Loading Docks (18 docks, 6 level doors)	

**Note:**  
 Enhance to office, subject to tenancy requirements and detailed design. Core to be in red. Access controlled. Columns indicative, subject to structural engineers advice.

**Redline Application Extents**

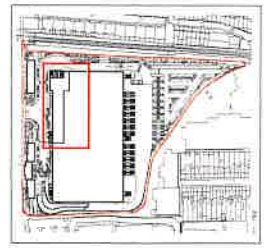
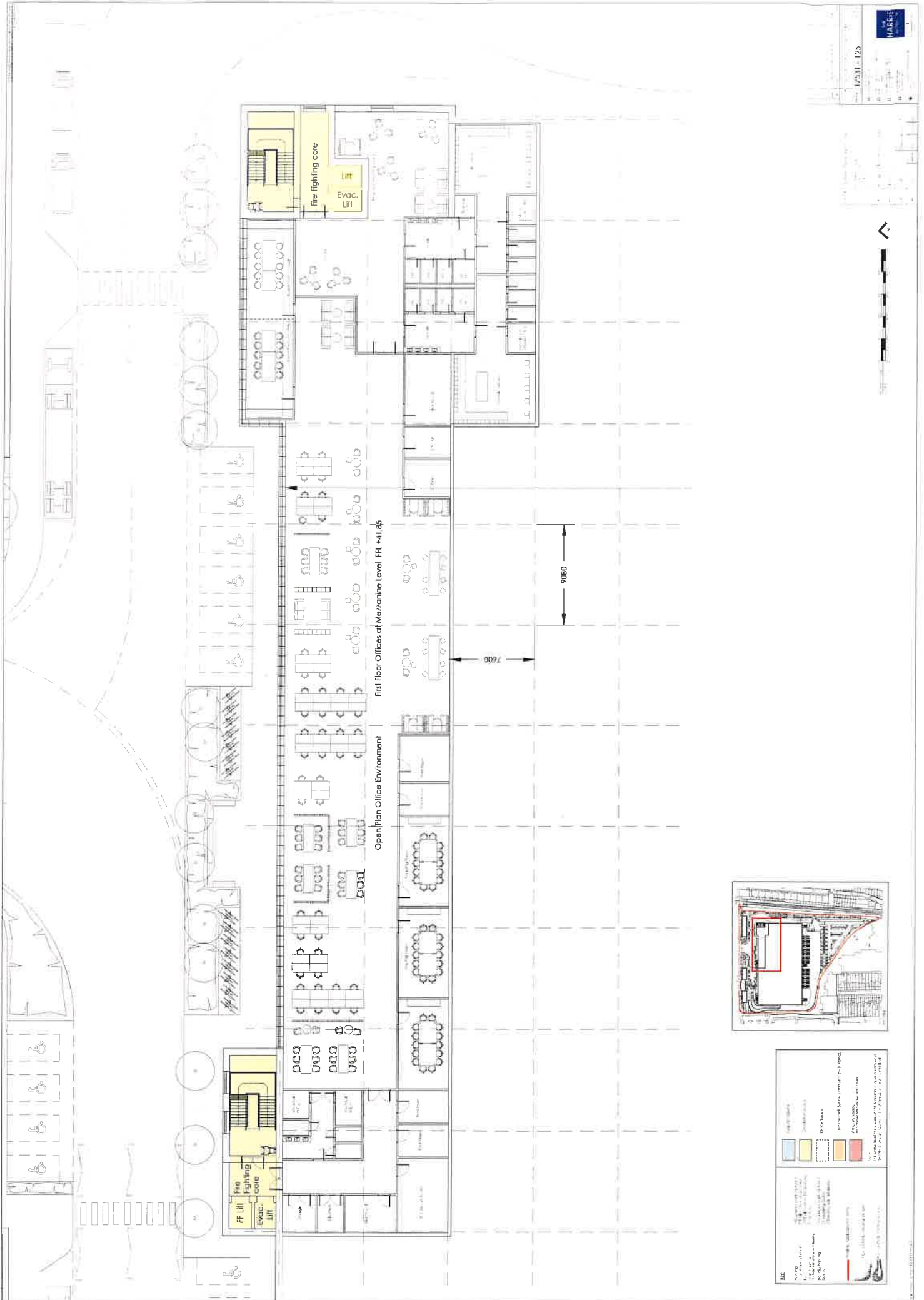
**HGV Vehicle, 90 degree turn**

**HGV Vehicle Turning Space**



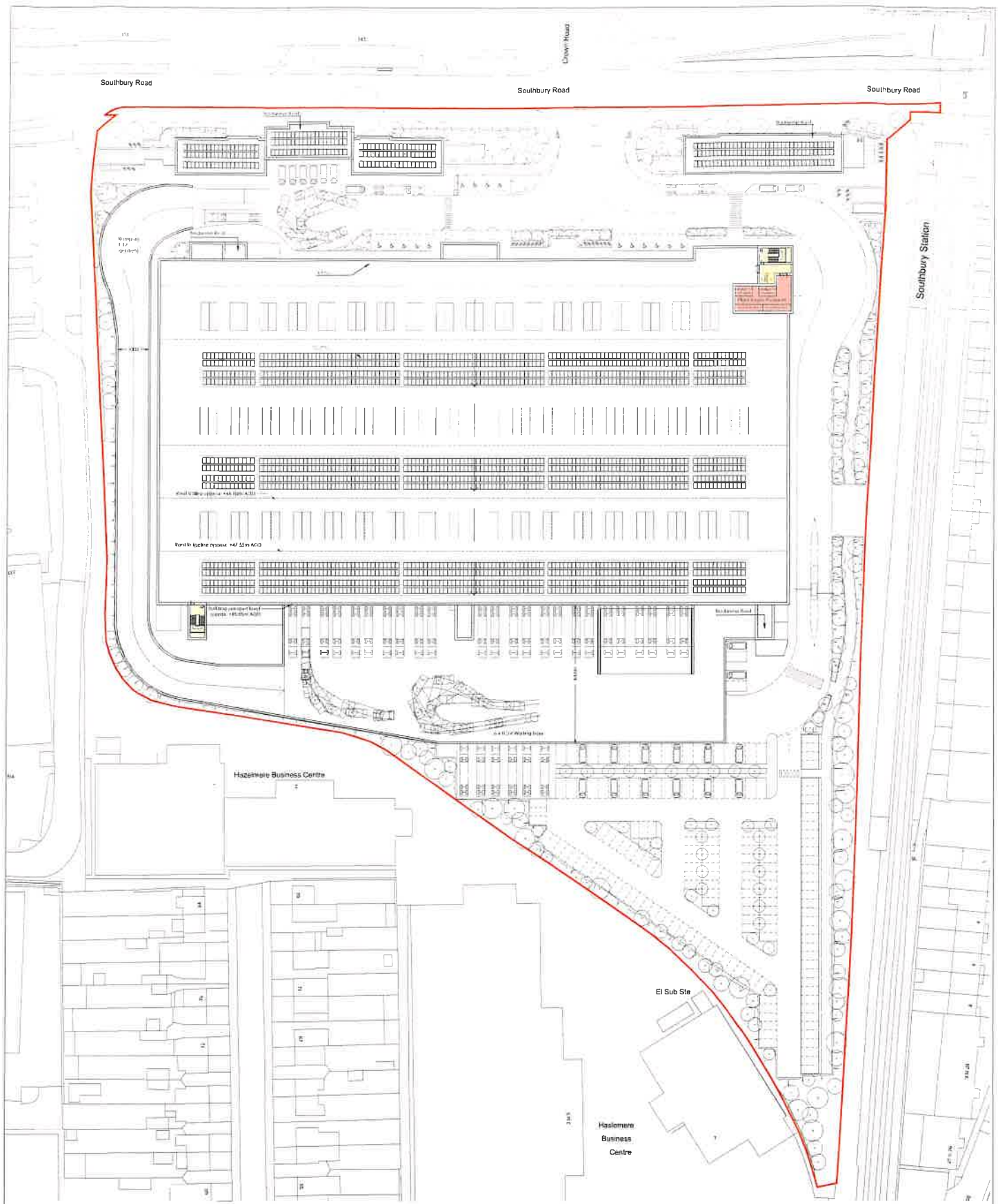
Project No.	Southbury Road Logistics Hub	Drawing No.	Proposed 1st Floor Plan
Client	Heritage House Southbury Road EN1 1NP	Reference	17531 - 124
Drawn	BL Logistics Investment Limited		
Scale	1:500	Drawing No.	A1
Date	10.03.23	Project No.	17531

**THE HARRIS ARCHITECTS**



**LEGEND**

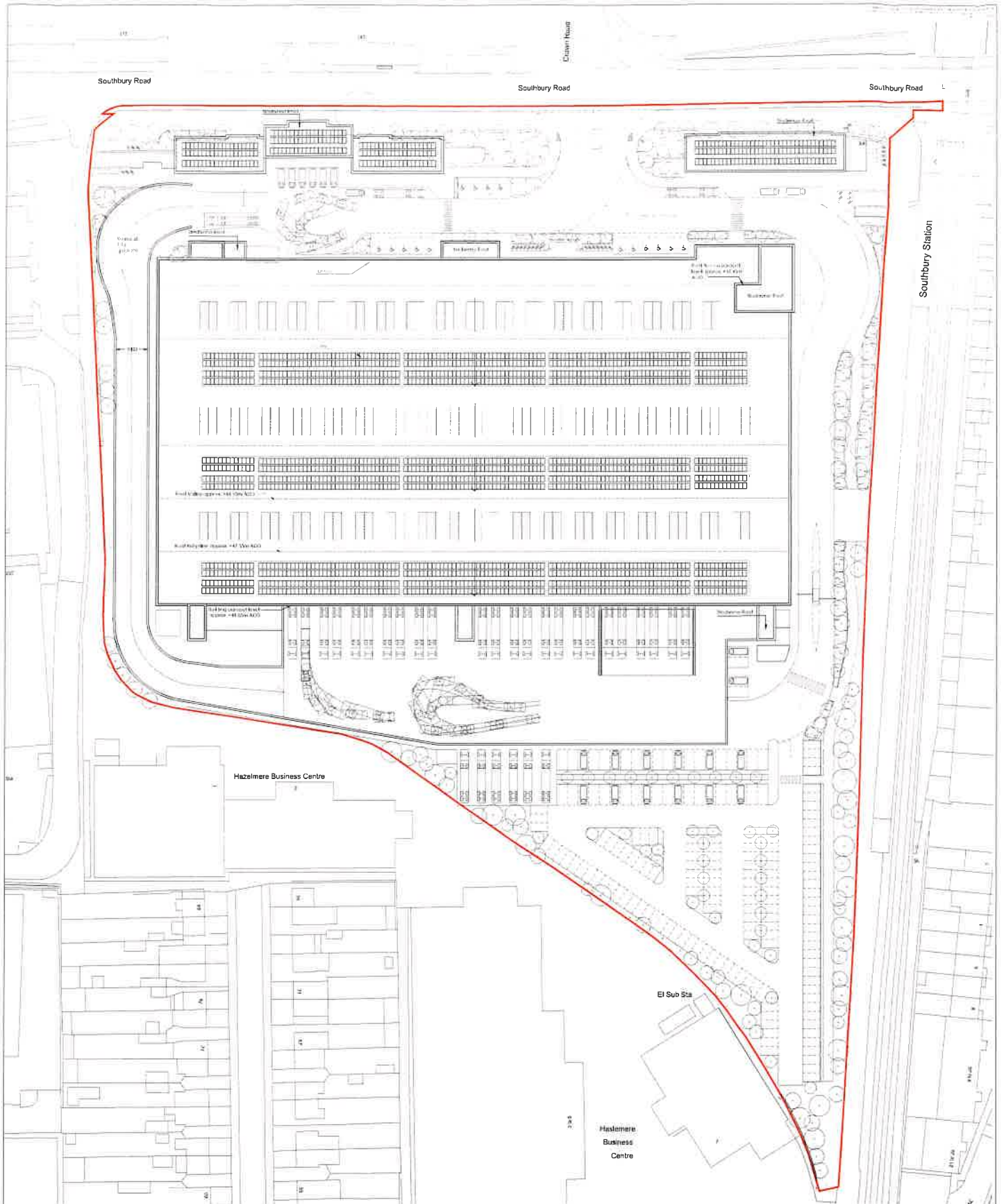
- FF Lift
- Evac. Lift
- Fire Fighting core
- Open Plan Office Environment
- First Floor Offices of Mezzanine Level FF #11.85
- Private Office
- Conference Room
- Reception
- Waiting Area
- Restroom
- Storage
- Janitor
- Stairwell
- Elevator Lobby
- Corridor
- Office
- Office Desk
- Office Chair
- Office Table
- Office Bench
- Office Partition
- Office Partition Wall
- Office Partition Glass
- Office Partition Metal
- Office Partition Wood
- Office Partition Fabric
- Office Partition Acoustic
- Office Partition Sound
- Office Partition Light
- Office Partition Dark
- Office Partition Bright
- Office Partition Dim
- Office Partition Neutral
- Office Partition Warm
- Office Partition Cool
- Office Partition Soft
- Office Partition Hard
- Office Partition Smooth
- Office Partition Rough
- Office Partition Gloss
- Office Partition Matte
- Office Partition Satin
- Office Partition High Gloss
- Office Partition Low Gloss
- Office Partition Semi Gloss
- Office Partition Eggshell
- Office Partition Flat
- Office Partition Textured
- Office Partition Smooth
- Office Partition Rough
- Office Partition Gloss
- Office Partition Matte
- Office Partition Satin
- Office Partition High Gloss
- Office Partition Low Gloss
- Office Partition Semi Gloss
- Office Partition Eggshell
- Office Partition Flat
- Office Partition Textured



KEY:	
Parking	145 spaces (incl. 15 Acc)
Car Sharing Priority	58% allocation (8 spaces)
EVC	20% allocation (30 spaces)
Van Parking	52 spaces
Bicycle Parking	193 spaces (incl. 13 Acc)
Docks	24 Loading Docks (18 docks, 6 level doors)
Redline Application Extent	
Logistics Space	
Circulation Space	
Office Space	
Commercial, Business and Service Buildings	
Amenity Space	
<b>NOTE:</b> Entrance to offices, subject to tenants requirements, and detailed design. Coves to be inlined, access controlled	
HDV Vehicle: 90 degree turn HDV Vehicle Turning Space	



<b>Southbury Road Logistics Hubs</b> Heritage House Southbury Road SNI INP	Project No: 17531 - 126 Date: 13/03/23 Version: 1.0	
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**KEY:**

Parking	145 spaces (incl. 15 Acc.)	Logistics Space
Car Sharing Priority	5% allocation (8 spaces)	Circulation Space
EVIC	20% allocation (30 spaces)	Office Space
Van Parking	100% allocation (50 spaces)	Commercial, Business and Service Buildings
Bicycle Parking	193 spaces (incl. 13 Acc.)	Amenity Space
Docks	24 Loading Docks (19 docks & level doors)	

Final Application Extents

HGV Vehicle: 70 degree turn

HGV Vehicle Turning Space

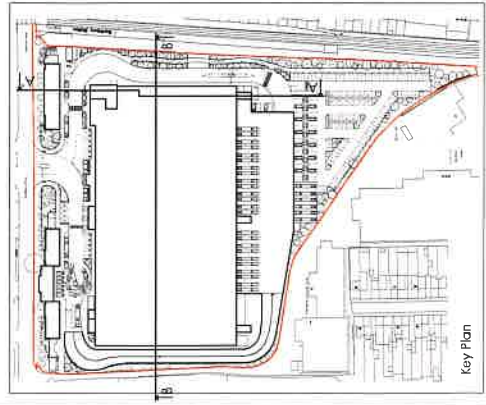
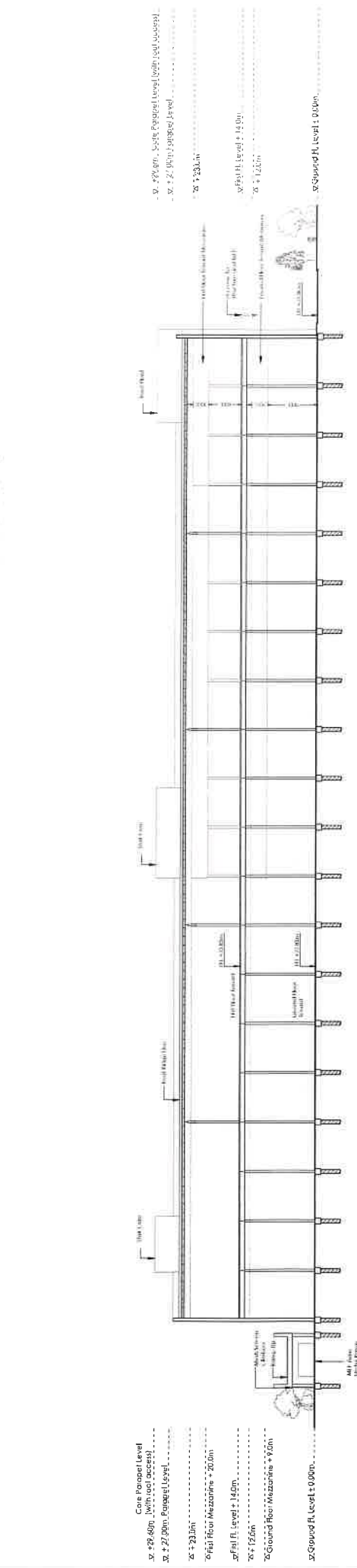
Note: Entrance to offices, subject to tenant's requirements and detailed design. Cares to be shared, access controlled.



Project Name	Southbury Road Logistics Hub	Project Ref	17531 - 127
Client	Heritage House Southbury Road Griffiths SNI INP	Project Location	Southbury Road, Southbury
Client Ref	HL Logistics Investment Limited	Project Status	Planning
Scale	1:500	Project No.	10 23 23
Date	10 23 23	Project Stage	IP

**THE HARRIS PARTNER**

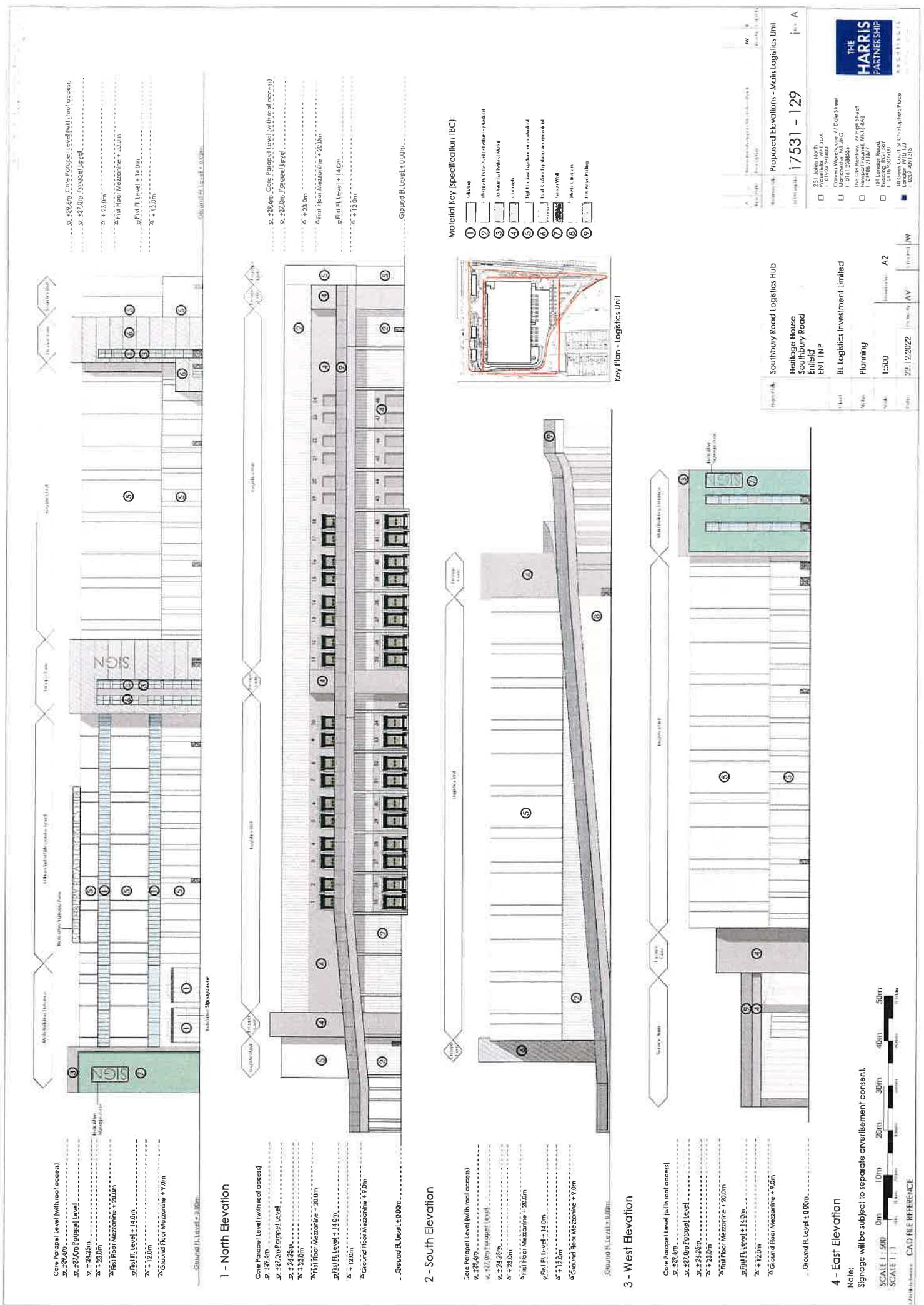


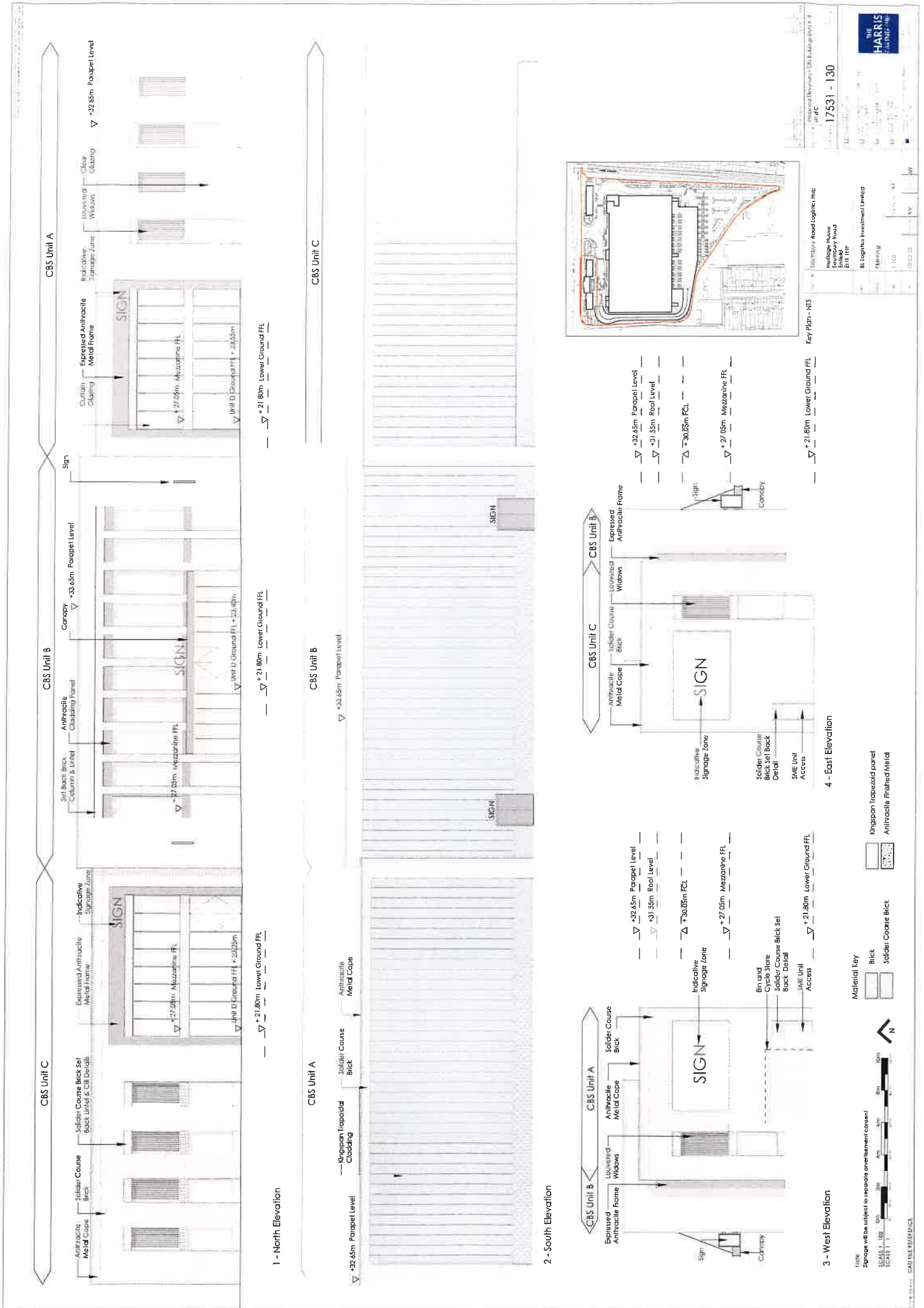


SCALE 1:500  
SCALE 1:1

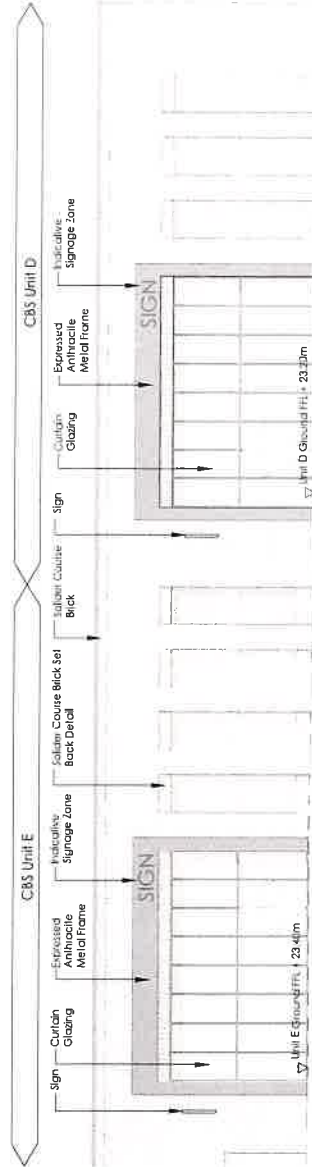
Project Title	Southbay Road Logistics Hub
Client	Heritage House Southbay Road Enfield EN1 1NP
Client Reference	BL Logistics Investment Limited
Phase	Planning
Date	10.03.2023
Drawn by	AV
Checked by	JW
Project No.	17531 - 128
Sheet No.	A



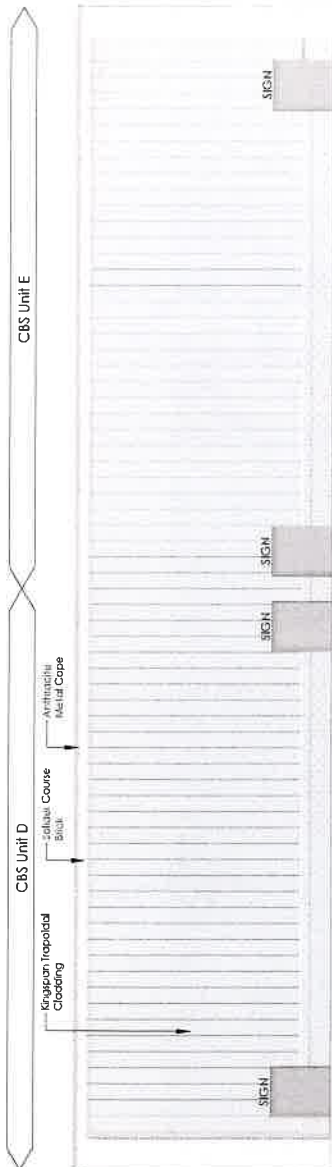




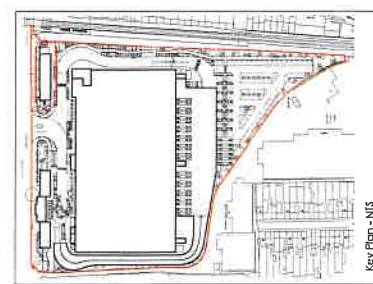
- ▽ +32.00m Parapet Level
- ▽ +30.90m Roof Level
- ▽ +29.20m FCL
- ▽ +28.70m Mezzanine FFL
- ▽ +29.00m Parapet Level
- ▽ +30.90m Roof Level
- ▽ +29.20m FCL
- ▽ +28.70m Mezzanine FFL
- ▽ +21.80m Lower Ground FFL



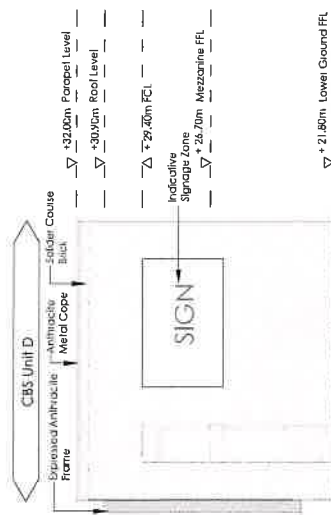
1 - North Elevation



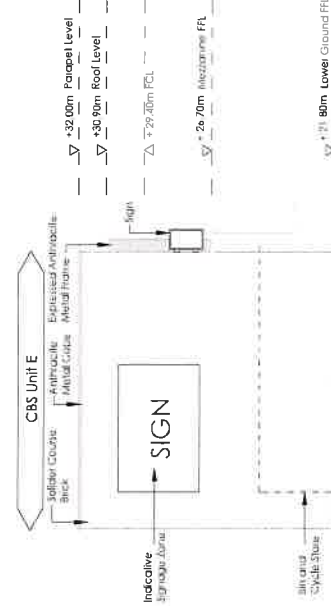
2 - South Elevation



Key Plan - NIS



3 - West Elevation



4 - East Elevation

- Material key
- Brick
  - Kingspan Trapezoidal panel
  - Anthracite Finished Metal
  - Solidator Course Brick

Note:  
Signage will be subject to separate advertisement consent



SCALE 1:100

CAD FILE REFERENCE

Universal Investment Services (UK) Ltd.  
 Projected Elevation  
 .../17531 - 131

Client: Kingspan  
 Project: Kingspan  
 Date: 11/01/2024  
 Scale: 1:100  
 Drawing: 1100

BL Logistics Investment Limited