

Public Document Pack



PLANNING COMMITTEE

Tuesday, 5th September, 2023 at 7.00 pm
Conference Room, Civic Centre, Silver
Street, Enfield, EN1 3XA

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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 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 - 8)

To approve the minutes of the meeting held on Tuesday 18 July 2023.

4. REPORT OF THE HEAD OF DEVELOPMENT MANAGEMENT (Pages 9 - 12)

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

5. 20/01742/FUL - FORMER PUBLIC HOUSE, 50-56 FORE STREET, EDMONTON (Pages 13 - 100)

RECOMMENDATIONS:

In light of the update information provided in this report:

1. That the Head of Development Management be authorised to GRANT planning permission subject to conditions and the completion of a s106 Agreement.
2. That the Head of Development Management be granted delegated authority to agree the final wording of the s106 Agreement and the final wording of the conditions to cover the matters in the Recommendation section of the original report dated 18 January 2022 and this report.

WARD: Upper Edmonton

6. 22/01542/OUT - ANGLO AQUARIUM PLANT, 30 AND 32 STRAYFIELD ROAD, ENFIELD, EN2 9JE (Pages 101 - 176)

RECOMMENDATIONS:

- 1) That subject to referral of the application to the Greater London Authority (Stage 2) and the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Planning be authorised to GRANT planning permission subject to conditions.
- 2) That the Head of Planning 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: Whitewebbs

7. DATES OF FUTURE MEETINGS

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

Tuesday 19th September 2023
Tuesday 17th October 2023
Tuesday 7th November 2023 (provisional)
Tuesday 21st November 2023
Tuesday 19th December 2023
Tuesday 9th January 2024 (provisional)
Tuesday 23rd January 2024
Tuesday 13th February 2024 (provisional)
Tuesday 20th February 2024
Tuesday 5th March 2024 (provisional)
Tuesday 19th March 2024
Tuesday 23rd April 2024

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

PLANNING COMMITTEE - 18.7.2023

**MINUTES OF THE MEETING OF THE PLANNING COMMITTEE
HELD ON TUESDAY, 18 JULY 2023****COUNCILLORS**

PRESENT Sinan Boztas (Chair), Mahym Bedekova (Vice-Chair), Josh Abey, Kate Anolue, Lee Chamberlain, Thomas Fawns, Alessandro Georgiou, Ahmet Hasan, Michael Rye OBE, Jim Steven, and Eylem Yuruk.

ABSENT Peter Fallart and Bektas Ozer

OFFICERS: Brett Leahy (Director of Planning and Growth), Andy Higham (Head of Development Management), Sharon Davidson (Planning Decisions Manager), Claire Williams (Planning Decisions Manager), Mike Hoyland (Senior Transport Planner), Nicholas Page (Conservation & Heritage Adviser), Dino Ustic (Senior Planning Officer), Lap-Pan Chong (Principal Planning Officer), Karolina Grebowiec-Hall (Principal Planner), John Hood (Legal Representative), and Harry Blake-Herbert (Governance Officer).

Also Attending: Applicant and agent representatives, members of the public, deputies, press and officers observing.

1 WELCOME AND APOLOGIES

The Chair welcomed everyone to the meeting.

Apologies for absence were received from Cllr Bektas Ozer, and Cllr Peter Fallart who was substituted by Cllr Alessandro Georgiou.

Apologies for lateness were received from Cllr Sinan Boztas (Chair) and Cllr Thomas Fawns.

2 DECLARATIONS OF INTEREST

A declaration of interest was received from Cllr Alessandro Georgiou, who would give a deputation on item 6, Application Reference 21/02546/FUL. Having sought advice from the legal representative, he would make this deputation, then withdraw from the meeting during discussions and voting on the application.

3 MINUTES OF PREVIOUS MEETING

On the item regarding Churchbury Lane, Application Reference 22/02248/FUL, Cllr Rye said that members wanted to know if there were any standards from social services for amenity space for supported living of this

PLANNING COMMITTEE - 18.7.2023

nature, and asked that this be clearly reflected/ added to the minutes, this was seconded by Cllr Boztas (Chair).

AGREED the minutes of the meeting held on Tuesday 20 June 2023 as a correct record, with the above amendment.

4 REPORT OF THE HEAD OF DEVELOPMENT MANAGEMENT

Received the report of the Head of Development Management, which was **NOTED**.

5 22/03123/VAR - 241 GREEN ST, ENFIELD, EN3 7SJ

Karolina Grebowiec-Hall, Principal Planner, introduced the report, highlighting the key aspects of the application.

She responded to Members' queries in respect of the additional staircase, to advise that there was adequate separation, that they were easily accessed and that they had been reviewed by HSE and Enfield Building Control and confirmed to be compliant. The addition of the second staircase was confirmed to be a requirement as part of the application seeking to reduce the affordable housing offer.

It was explained that the reduction in affordable units had triggered the requirement for a viability assessment, that the recent economic/ build cost challenges had been considered, and found that 25% affordable units was what was viable. The officer expressed that 37 units (25% of the total units) were being offered at a discounted market rate of 30%, and would be secured by a section 106 and held as intermediate in perpetuity, and that 111 units were for the private market. The officer confirmed that the decision notice for the application was issued in March 2022 and the application had been considered by committee in December 2020. With regards to the intermediate units, the officer said that the highest priority need was for 1 and 2 bed units which was what proposal sought to allocate for, and that the deviation from market compliance was not significantly different from what had been approved, with the level of non-compliance remaining largely the same.

Members expressed that officers should have informed the committee that the original application had not been viability tested, and asked that in future officers advise on the level of confidence they have in the viability of affordable accommodation being offered. The Head of Development Management appreciated that a change in the affordable housing had been made in this new/separate application/proposal. The Director of Planning and Growth added that the framework in which assessments are made was set by policy, that the viability had been tested and was reflective of current economic circumstances.

In response to Member's queries regarding the reduction in car parking spaces, Mike Hoyland, Senior Transport Planner, advised that there was a

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reduction in 2 and 3 bed units, thus a fall in demand for parking, and that the proposals complied with the London Plan.

Members had ongoing concerns with regards to the reduction in the offer for social housing.

The Chair, in consultation with the legal representative advised that Cllr Fawns could not take part in the discussion or vote on the issue having arrived late during the item.

The proposal having been put to the vote; Members voted:

6 FOR
2 AGAINST
2 ABSTENTIONS

and so, it was AGREED:

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.

6 21/02546/FUL - 368 COCKFOSTERS ROAD, BARNET, EN4 0JT

Cllr Georgiou, having sought advice from the legal representative, would make his deputation, then withdraw from the meeting during discussions and voting on the application.

Dino Ustic, Senior Planning Officer, introduced the report, highlighting the key aspects of the application.

The officer provided the following updates: condition 19 in the report regarding energy saving measures had made reference to building regulations 2013 which had been updated to 2021; the agent had agreed to an additional condition to secure a minimum net biodiversity gain of 10% on/as close to the site as possible, as per the London Plan 2021; an additional condition for an arboricultural method statement to be provided; and the proposed CIL estimate had changed from £250,000 to £226,992, due to using the Enfield CIL calculator which was more precise.

A deputation was received from Cllr Alessandro Georgiou, Cockfosters Ward Councillor, who spoke against the officers' recommendation. Cllr Georgiou

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then withdraw from the meeting during discussions and voting on the application.

The agent, Mr Graham Fisher, spoke in response.

Officers responded to comments and questions, and advised that the number of trees referenced in paragraph 4.3, included those located along the shared boundary, that the appeal decision at 37 Lancaster Road was not relevant to and included different issues such as overlooking which were not an issue on this application, and that the sun/day light reports complied with the guidelines.

In response to Member's queries regarding parking, Mike Hoyland, Senior Transport Planner, advised that parking space was compliant with policy. Cycle parking met London Plan standards. The vehicle access was similar to neighbouring properties, and that the car park was big enough to accommodate deliveries.

In response to Member's queries regarding the affordable housing contribution, Sharon Davidson advised that only one unit could have been accommodated, thus an offsite contribution was considered more appropriate.

In response to Member's queries regarding trees, officers confirmed the trees being removed, and that there was a condition that a minimum of 6 trees would be replanted.

In response to Member's queries regarding design, officers advised that the size/bulk/scale/mass/footprint of neighbouring properties were similar if not larger than what was being proposed, that the building was set in from the boundaries by 1.5m and designed to reduce the appearance of mass.

In response to Member's queries regarding storage space, officers advised that the gross internal area compensated for the lack of storage space.

Members had ongoing concerns with regards to parking/ transport.

The proposal having been put to the vote; Members voted:

7 FOR
3 AGAINST
0 ABSTENTIONS

and so, it was AGREED:

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

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the Recommendation section of this report and the final S106 Agreement to cover the matters identified in the S106 Contributions section of the report.

The Chair adjourned the meeting at 20:24, to give members a rest break, and asked that Cllr Georgiou be invited to re-join the meeting, the meeting resumed at 20:31.

7 20/01982/FUL - LAND REAR OF ELLINGTON COURT, SOUTHGATE N14 6LB

Claire Williams, Planning Decisions Manager, introduced the report, highlighting the key aspects of the application.

The officer provided details of two representations, the first of which was an update from Southgate Green Association, who asked that the application be deferred for consideration, as they still had concerns with the scheme relating to heritage assets and amenity of the residents of Ellington Court. A resident had also asked for their concerns/ objections to be read out, these included: the distance of the new building to the boundary, the impact on heritage assets, overlooking/ privacy issues, and the fact that permitted development rights may allow the developer to increase the height of the building.

Officers responded to comments and questions, and advised that there was a distance of 74m between the rear boundary of the site and the rear of 4 and 5 The Green (Grade 2 star listed properties), and that this was added to by the distance the building was set away from the boundary. With vegetation and the reduction from 3 to 2 storeys, there was not concern about the heritage impact on the listed buildings, and that the wall would not be impacted.

In response to Member's queries regarding access, officers advised that vehicle access would be limited to the existing car park of Ellington Court, and that the new building was being designed to only have pedestrian access. Emergency services would be able to access the site with more than sufficient space to accommodate even the larger emergency vehicles.

In response to Member's queries regarding permitted development rights, the officer replied that a condition was proposed to remove permitted development.

In response to Member's queries regarding transport, officers advised that the site would make use of the 11 existing parking spaces available at Ellington Court, that 18 cycle spaces were proposed, and further details on additional spaces would be a condition.

In response to Member's queries regarding the reduction of garden space for the existing block, officers advised that the proposal would leave more than sufficient communal space as it relates to policy.

In response to Member's queries regarding consultation, officers advised that only 2 objections had been received, that the neighbouring properties were

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consulted, notices were posted/ advertised, and discussions had taken place on the original application. The reduction in scale did not require re-consultation. The officer confirmed that Walker Primary School were consulted on the application and had raised no objections.

Cllr Rye proposed a countermotion, that a decision on the application be deferred, until a site visit could be conducted, on the grounds that it would: help members to take into account the context of the site, the conservation issues, the issues of overlooking, and the loss of garden space. This was seconded by Cllr Georgiou.

The proposal having been put to the vote; Members voted:

6 FOR
4 AGAINST
1 ABSTENTION

and so, it was AGREED:

That a decision on the application be deferred, until a Member site visit could be conducted at a future date.

8 23/00824/FUL - HERITAGE HOUSE 345 SOUTHBURY ROAD ENFIELD EN1 1TW

Lap-Pan Chong, Principal Planning Officer, introduced the report, highlighting the key aspects of the application.

In response to Member's queries regarding consultation, the officer advised that 2 objections had been received regarding light and noise impact, particularly during construction. The Poppy Drive resident's association had been consulted during the pre-application process, and at the application stage no comments were received.

In response to Member's queries regarding construction, the officer advised that there was a construction logistic plan as part of condition 15, which aimed to minimise the impact on residents. The officer added that the demolition phase was planned to last around 6 months and the construction phase around 18 months. A condition on dust control measures had been approved and would be followed through with at the appropriate stage. Mike Hoyland, Senior Transport Planner, confirmed that the construction phase operating outside of school/ work rush hours was a key consideration in order to avoid unnecessary additional congestion.

In response to Member's queries regarding overshadowing, the officer advised that the relevant guidance and assessments had been followed and complied with.

In response to Member's queries regarding unfeasible secondary pedestrian cycle access, the officer advised that the options had been explored with the

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applicant, but was not viable, and that other methods of promoting active travel had been pursued, such as the 2 way cycle lane, cycle parking, and the financial contribution.

The proposal having been put to the vote; Members voted:

11 FOR
0 AGAINST
0 ABSTENTIONS

and so, it was AGREED unanimously:

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.

9 DATES OF FUTURE MEETINGS

Members noted the dates of future meetings as set out in the agenda pack.

The Head of Development Management advised that the provisional committee meeting dates scheduled for 1 and 29 August 2023, would not be required, and thus that the next meeting would take place on 5 September 2023.

The meeting ended at 21:42.

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London Borough of Enfield

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| Report Title | Report of Head of Development Management |
| Report to | Planning Committee |
| Date of Meeting | 5 th September 2023 |
| Cabinet Member | Councillor Susan Erbil |
| Executive Director / Director | Brett Leahy – Director of Planning & Growth Sarah Cary – Executive Director Housing, Regeneration & Development |
| Report Author | Andy Higham andy.higham@enfield.gov.uk |
| Ward(s) affected | All |
| Key Decision Number | Non Key |
| Classification | 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, 625 applications were determined between 05/07/2023 and 21/08/2023, of which 452 were granted and 134 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**

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

Date of report: 23.08.2023

Appendices

None.

Background Papers

To be found on files indicated in Schedule.

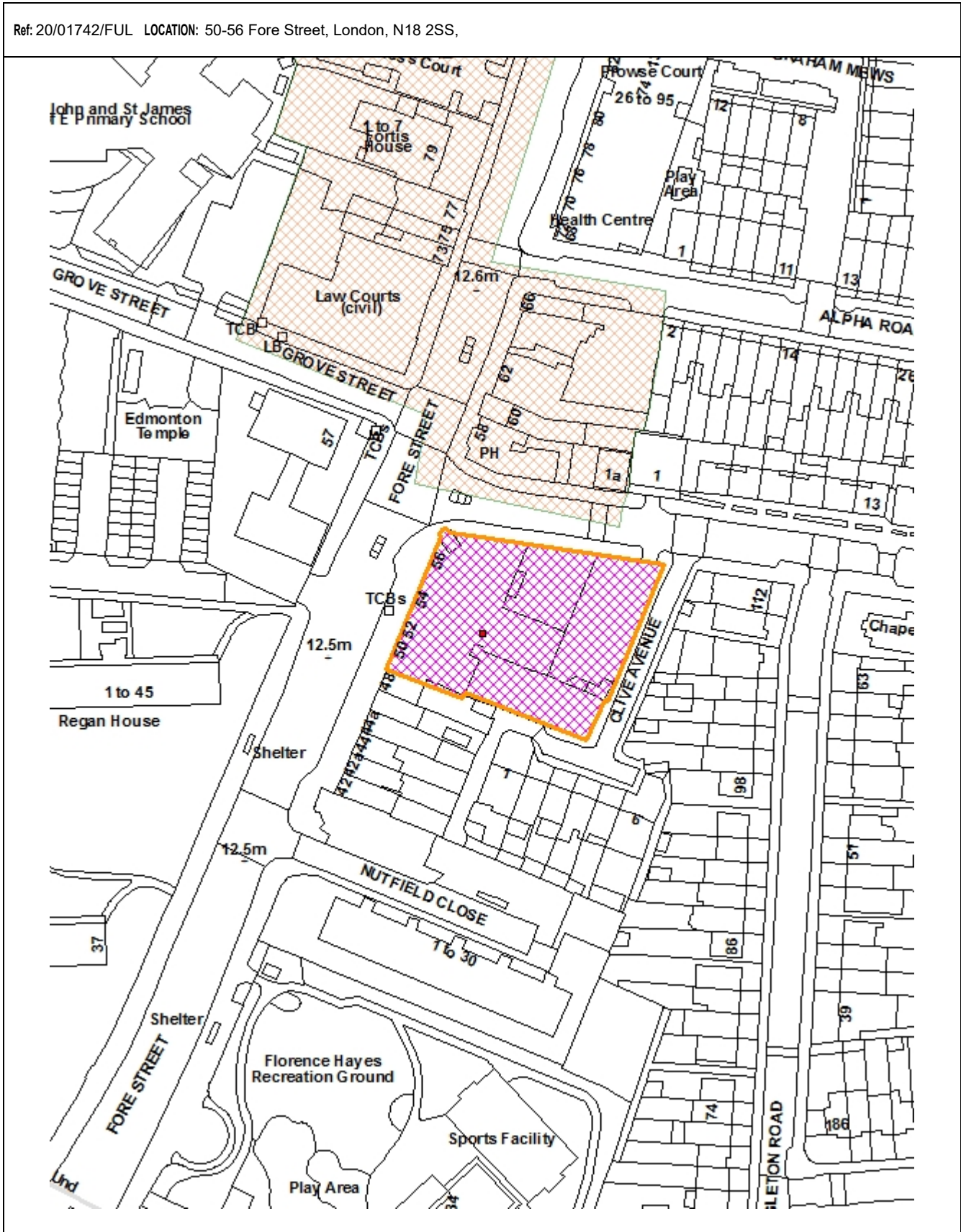
Background Papers

None

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| LONDON BOROUGH OF ENFIELD | | |
| PLANNING COMMITTEE | Date: 5 th September 2023 | |
| Report of Director of Planning & Growth - Brett Leahy | Contact Officers: Lap Pan Chong Sharon Davidson | Category Major |
| Ward Upper Edmonton | Councillor Request No | |
| LOCATION: Former Public House , 50-56 Fore Street, Edmonton | | |
| APPLICATION NUMBER: 20/01742/FUL | | |
| PROPOSAL: Redevelopment of the site involving demolition of the existing building and the erection of a new development comprising a residential use (Class C3) with flexible community/commercial space at ground floor (Class A1/A3/A4/D1), creation of landscaping and associated works. | | |
| Applicant Name & Address: Social Capital Partners (Fore Street Ltd) C/O agent | Agent Name & Address: Mr Tom Sweetman DP9 100 Pall Mall London SW1Y 5NQ | |
| RECOMMENDATION: In light of the update information provided in this report: | | |
| <ol style="list-style-type: none"> 1. That the Head of Development Management be authorised to GRANT planning permission subject to conditions and the completion of a s106 Agreement. 2. That the Head of Development Management be granted delegated authority to agree the final wording of the s106 Agreement and the final wording of the conditions to cover the matters in the Recommendation section of the original report dated 18 January 2022 and this report. | | |

Ref: 20/01742/FUL LOCATION: 50-56 Fore Street, London, N18 2SS,



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North



1. Note for Members:

- 1.1 This application was first considered by the Planning Committee on 26 October 2021. At this meeting Members identified three grounds of concern:
- i) the bulk, mass and height of the development relative to setting and appearance of the Fore Street Conservation Area which did not outweigh the public benefits of the scheme.
 - ii) the residential mix and the number of 1- and 2-bedroom residential units as opposed to family units for which there is the greatest local need.
 - iii) the height, bulk and design of the proposed development relative to the impact on the character and appearance of the area
- 1.2 As a result, it was agreed to defer making a decision to enable officers to prepare detailed reasons for refusal based on the aforementioned grounds.
- 1.3 Following this resolution, the Applicant responded to the concerns identified by Members with an offer to revise the planning application by:
- increasing the number of family units to 20% at London Affordable Rent (from 14 x 3b units to 22 x 3 bed units)
 - decreasing the overall number of residential units from 113 to 110.
- 1.4 This new information was presented to Planning Committee on 23rd November 2021 alongside draft reasons for refusal contained in a Part 2 report. After consideration, Members confirmed there was merit in the proposed amendment warranting further assessment in an additional report to Planning Committee. As a result, the application was again deferred to enable the additional information to be assessed.
- 1.5 The application with the additional information was then considered at the Planning Committee on 18 January 2022, when Members having given weight to the revisions, resolved to refuse planning permission on the following grounds:
1. The proposal, by reason of its bulk, mass, height, and elevational design, would represent a form of development that would fail to preserve or enhance the character and appearance of the Fore Street Conservation Area and would have a detrimental impact on the setting of the non-designated heritage assets in the immediate vicinity of the site, namely the former Edmonton Country Court building and the former Phoenix public house (now LT Bar). This would result in less than substantial harm, to the Fore Street Conservation Area as well as harm to the non-designated assets which taking account of the need to consider the "sequential approach"; the 'at risk' status of the Conservation Area; the concept of cumulative harm; the requirement for 'great weight' to be given to this harm; and the requirement for 'clear and convincing justification' for any level of harm, would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation having regard to housing need, the presumption in favour of approving sustainable development and the 'tilted balance'. The proposal is therefore contrary to the objectives of Section 66 of the Town and Country Planning Act 1990, Section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990; the sequential test as set out in the National Planning Policy Framework 2021; Policies HC1 and D4 of the London Plan 2021; Policies CP30 and CP31 of the Core Strategy 2010; Policies DMD37 and DMD44 of the Development Management Document 2014; and Objective 10 of the Enfield Heritage Strategy 2019.

2. The proposal, by reason of its siting, presence, height, bulk, appearance and design, is not well designed and would represent an insufficiently high quality, incongruous and overly dominant form of development that, having regard to housing need, the presumption in favor of approving sustainable development and the tilted balance, fails to satisfactorily integrate with its surroundings negatively impacting on the enjoyment, function and safety of surrounding spaces, detrimental to and out of keeping with the character and appearance of the surrounding area which would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation. The proposal is therefore contrary to the design objectives as set out in the National Planning Policy Framework 2021 (in particular Section 12); Policies D3, D4 and D9 of the London Plan 2021; Policy CP30 of the Core Strategy 2010; Policy DMD37 and DMD 43 of the Development Management Document 2014.

1.6 Following the resolution of Planning Committee, the planning application was referred to the GLA for its Stage 2 consultation in accordance with statutory procedure.

1.7 The decision of the Mayor was made on 30th May 2022 and although it was confirmed that the Mayor was content to allow the local planning authority to determine the case itself, it did make a number of comments in support of the proposal. In particular, the Mayors Stage 2 response confirmed that the development would contribute to meeting the target of additional homes in London and the 100% London Affordable Rent offer would contribute towards meeting the affordable housing target with the GLA commenting:

“This refusal would therefore mean that new residential units, including affordable, which could contribute to meeting London’s housing need, would not be delivered and this would have an impact on the implementation of the London Plan. The units would also contribute towards the London Plan and Enfield’s affordable housing targets and respond to London’s acute need for low-cost rental housing. The Council in its committee report identifies that the Borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs to meet its housing target.

The proposed development would therefore make a welcome contribution to housing and affordable housing. Borough officers have also assessed the application against Enfield’s recent housing performance, given that borough has been placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test. The delivery of 110 affordable housing units would therefore have a significant impact on the implementation of the London Plan, albeit to a limited degree due to the limited scale of the development.”

1.8 In respect of affordable housing and mix, the GLA also advised that:

a) Affordable Housing

The proposal has been revised to deliver all of the 110 residential units proposed at London Affordable Rent (LAR). Given the acute need for affordable housing within London and the preference for low-cost rent products due to the level of need for this type of tenure, the substantially improved affordable housing offer is strongly supported. Should the proposal be considered at appeal, or a future application submitted, key details including affordability levels and eligibility should be secured in line with the Mayor’s Affordable Housing and Viability SPG and London Plan Policy H6.

b) Unit mix

At Stage 1, officers raised no strategic concern with the proposed unit mix when considering the site location, PTAL and the density and form of the proposals. The provision of family-

sized units has been increased to 20% of units which is welcomed given the strategic need for family sized affordable accommodation. The Council's committee report states that although the proposed mix is significantly weighted towards 1- and 2-bedroom units which is not immediately consistent with local need for larger family accommodation, the proposed unit mix could be accepted on balance in the context of the location and the 100% LAR affordable housing offer. Accordingly, GLA officers remain supportive of the proposed mix.

c) Height

At Stage 1, the massing strategy was considered legible, however concerns were raised that the proposed tower appears bulky and top heavy, that the proposed materiality further emphasises the height of the tower and the applicant was advised to further refine the massing and materiality of the building to better complement the surrounding context. As set out in paragraph 17 of this report, the applicant has sought to address concerns raised during the application process. Significant changes to materials, a softened appearance with the inclusion of curved balconies and emphasised verticality through detailing throughout the tower and changes to fenestration are also welcomed changes in response to the surrounding context. The relocation of the main entrance and the removal of the colonnade also improve the appearance of the scheme from immediate views. GLA officers remain supportive of the massing strategy across the site. The terrace extension along Fore Street, the tallest element on the north-west corner and stepping down to relate to lower-rise homes to east, is a logical approach to the massing distribution. The revisions to the scheme have gone some way to mitigate the impacts raised at Stage 1, however, the bulk of the tower appears page 13 similar to the original proposal reviewed at Stage 1 when viewed from mid-range views, so concerns identified at consultation stage remain over the building's response to the local townscape in this respect. As addressed from paragraph 53 of this report, GLA officers consider that the heritage impacts of the proposed development could be acceptable on balance when weighed against the public benefits of the scheme.

In summary, the proposed development is not in an area deemed in the development plan as suitable for tall buildings as required by London Plan Policy D9(B), and the proposal is not therefore fully compliant with Policy D9. However, in view of the broad compliance of the scheme against the criteria in Policy D9(C), GLA officers remain broadly supportive of the tall building in the proposed location. However, some concerns remain over building bulk and a revised fire statement would be required. Any required mitigation measures to ensure acceptable wind conditions should also be secured. Should the scheme be considered at appeal, or a revised application submitted, the outstanding matters identified as part of the above assessment in accordance with Policy D9(C) should be addressed and appropriate mitigation secured where necessary.

d) Heritage

Although the resulting harm to heritage assets would be contrary to London Plan Policy HC1, the NPPF heritage balance would also be triggered, and in accordance with the NPPF this harm would need to be able to be weighed against the public benefits of the proposal. Since Stage 1, the proposal has been revised to include 110 affordable units at London Affordable Rent in addition to improvements to the design and appearance. Accordingly, the public benefits of the proposal have been increased since the consultation stage. GLA officers consider that the benefits of the proposal in this instance would outweigh the less than substantial harm, which would result to heritage assets, in accordance with paragraphs 202 and 203 of the NPPF.

- 1.9 Essentially while the Mayor does not object to the Council determining the application in accordance with its resolution, the Stage 2 response confirmed the GLA's support for the proposal on these key issues. This is an important consideration and is new information Members need to consider when deciding whether to reaffirm their previous resolution or

not as the comments will be presented against the Council's case by the Applicant in any appeal. However, it should be underlined that Members retain the right to refuse the application if so minded, for the reasons contained in Paragraph 1.5 of this report. notwithstanding the new information.

- 1.10 Notwithstanding the extant resolution made by Planning Committee, legal advice is that any new information material to the assessment of the application, should be considered prior to the final decision of the local planning authority being issued.
- 1.11 Mindful of this requirement, it is also considered that the current pressures on the Council to provide new homes and meet local housing needs has also changed and is this a further material consideration.

Housing Update

- 1.12 Since the last resolution of the Planning Committee, there remains a continued and increasing need for new homes especially those available to provide rented accommodation in the Borough. Recent economic trends have meant that the number of properties available to rent is declining. For the Council, this means there is an increased pressure on the Council to provide temporary accommodation for homeless persons with the Council having to resort to a costly reliance on hostels and B&B accommodation.
- 1.13 At present, there are around 3,121 households in temporary accommodation and 187 children in B&B/hotel accommodation which has increased since January 2022 when the matter was previously considered.
- 1.14 The Council's housing team have confirmed they continue to experience increased pressure for all different types and sizes of accommodation but there is an overarching need for affordable housing and particularly social rented units in response to the Boroughs housing need.
- 1.15 As of January 2023, there were 5000 households on the housing needs register. Whilst demand remains for family housing, the priority is for supply across all bedroom sizes. Including one and two bedroom units which would be more appropriate to be delivered in a tall building such as that proposed. 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 reasons 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.
- 1.16 There are 703 households with a 1 bed need, of which 469 are homeless households. Additionally, 1beds help to support under occupiers in existing social rented properties to be released through downsizing, which creates chain links and makes larger existing properties available to address pressures on allocations for family housing. Furthermore, homeless demand is currently at crisis point fuelled by rising demand and collapse of available private sector properties, especially at the affordable end of the market. This impact is being felt across London and in other parts of the country.
- 1.17 Given the primacy of meeting housing need set out at all levels of planning policy and the tilted balance with the presumption in favour of approving sustainable development, it is considered this the current Borough circumstances represent a material change requiring assessment prior to any final decision being made.
- 1.18 In terms of the balance to be applied, the policy context within which the decision must be framed is important. The NPPF (Paragraph 125) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, (as it is in this case), it is

especially important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. Furthermore, 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 which the Council is not in a position to meet.

- 1.19 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.
- 1.20 In 2016/17, 30% of housing completions were affordable, whilst in 2017/18 this decreased to 7% of housing completions being affordable, amounting to 37 units in total being delivered. These figures show that the target 40% affordable housing delivery is not currently being met in the Borough. The Housing and Growth Strategy (2020) sets out an ambition to increase the target of 50% of new homes to be affordable housing in the next Local Plan. Enfield's Housing and Growth Strategy (2020) states the Borough's ambition to develop more homes that are genuinely affordable to local people, so more people can live in a home where they spend a more reasonable proportion of their household income on housing costs.
- 1.21 Enfield is in a category of "presumption in favour of sustainable development" having failed to meet a 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.
- 1.22 It must be noted that the previous 100% London Affordable rent offer has now changed to 100% social rent. This remains acceptable and is welcomed by the Housing team as there is a need for this type of tenure in the borough. The rent levels will need to be equivalent to 60% of market rent (i.e., discount of 40%) and this will be secured through a s106 legal agreement. Moreover, the fact that the development would still provide 100% affordable rent (which the Applicant is committed to deliver) in the context of the current market and cost inflation which has affected the viability of many schemes, is a positive factor, which also needs to be considered in the overall balance before confirming a final decision.

Fire Safety

- 1.23 The GLA Stage 2 response made reference to the need for the development to provide a second staircase, in response to the direction of travel regarding fire safety in tall buildings over 30metres in height. This change required a second fire escape staircase to be incorporated within the design and the Applicants requested this be addressed prior to formal determination of the application. As a result, the core was shifted marginally to the right to ensure that both staircases would have access to the basement and a separated final escape was added. No external changes are proposed as part of the reconfiguration and the commercial frontage, refuse storage with collection point, cycle storage and servicing would be retained. The proposals have resulted in changes to the unit mix breakdown, which are discussed within the Housing Section of this report.
- 1.24 A neighbour re-consultation was not required due to the minor change to the scheme. However, following a re consultation with the statutory consultee, the Health and Safety Executive (HSE), no objections were raised and the HSE is content with the fire safety design. It is recommended that a planning condition is included requiring compliance with the Fire Strategy to accord with London Plan Policy D12.

- 1.25 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.
- 1.26 It is considered the provision of the second staircase addresses the concern identified.
- 1.27 The revisions to accommodate a second staircase, however, have resulted in minor changes to the mix. Although, the overall breakdown within the mix has changed to incorporate increased 1b1p (15%) and 2b3p (52%), previously 0% and 25%, and reduced 1b2p (13%) and 2b4p (0%), previously 27% and 24%, this is considered acceptable as it would still maintain the previous split of unit sizes, which is deemed acceptable having regard to the tilted balance in favour of approving schemes for residential development. The Housing team also raise no concerns with the mix proposed.

Conclusion

- 1.28 The previous resolution of the Planning Committee is recognised, and Members retain the right to refuse the application, having considered the new information presented in this report. The relationship to the surrounding area and conservation area remains as previously reported and previously members considered the benefits of the proposal did not outweigh the harm to the surrounding area and the conservation area. Nevertheless, officers feel the comments of the GLA, the current housing circumstances and the need for new affordable homes are pertinent and mean that additional weight can be given in the planning balance, to these aforementioned considerations as outlined in this report when deciding whether to confirm a decision on this application.
- 1.29 As Members will be aware, there is an increasing demand for housing, and affordable housing within the Borough. Enfield has an extremely challenging 10-year housing delivery target accentuated by the low housing delivery over recent years – only 73% of that required being delivered with only 3.8 years of housing land supply identified as opposed to the required 5 years. In this context the provision of 110 homes all of which would be delivered at social rent, which is accessible to local residents, represents a significant contribution and weighs heavily in favour of the development despite the acknowledged concerns with the proposal. This is reflected in the comments of the GLA in their Stage 2 response which will be used by the Applicant in any appeal against a decision to refuse planning permission.
- 1.30 Mindful of the above, whilst taking into account both the housing need of the Borough together with the track record of delivery against target alongside changing circumstances, it is clear that the Council must seek to optimise development on brownfield sites such as this. The comments of the GLA in their Stage 2 response are pertinent in this respect. They advise that they consider this site to be an appropriate location for a tall building and that the public benefits outweigh the harm to the conservation area, must also be noted.
- 1.31 The starting point for the determination of any planning application is the development plan and the need to determine planning application in accordance with the development plan. It is clear this is a development in a sensitive location wherein the relationship to a number of heritage assets and the wider townscape needs to be carefully assessed in accordance with relevant legislation, guidance and policy.
- 1.32 Members have previously expressed concerns regarding the harm arising from the development on designated and non-designated heritage assets and the effect arising from the height of the development on the surrounding area. The matter to be considered therefore is whether the additional information in the form of the GLA comments and the current pressures for affordable rented accommodation as a public benefit, is sufficient to outweigh the harm to the Conservation Area and the visual amenities of the surrounding area.

- 1.33 Designated heritage assets are listed as areas or assets of particular importance. In making this assessment of planning balance therefore, Members need to consider the advice on the weight to be given to harm to heritage assets in Paragraphs 9.81- 9.104 of this report. However, the application also has to be considered in the light of the Housing Delivery Test and the need for housing to meet the Council's strategic housing targets, triggering the tilted balance in any assessment and the presumption 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 this Framework taken as a whole" (Paragraph 11(d) of the NPPF). Furthermore, Paragraph 11(d) of the NPPF, acknowledges that planning permission should be granted unless "the application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed".
- 1.34 Having regard to the assessment in this report, it is concluded the development would cause 'less than substantial harm' to identified heritage assets.
- 1.35 Where there is 'less than substantial harm' to the significance of a designated heritage asset, this should be weighed against the public benefits of the proposal. In this case, the public benefits of the development include:
- i) 110 new residential homes
 - ii) 100% of the residential units being genuinely affordable and provided at social rent which Housing have confirmed meets an identified need

In addition, other public benefits of the proposal are considered to be:

- iii) replacement multi use commercial space
- iv) enhancement of Clive Avenue to address anti-social activity
- v) employment opportunities during construction
- vi) investment into Fore Street

It is considered that these public benefits especially the fact that the all the residential units would be affordable rent levels, outweigh the 'less than substantial harm' identified.

- 13.7 Consequently, it is considered the application of policies in the Framework which protect areas or assets of particular importance do not provide a clear reason for refusal. As mentioned above, Limb ii. of paragraph 11(d) of the NPPF is therefore engaged, whereby 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 this Framework taken as a whole*".
- 1.38 It is acknowledged and as is recognised throughout this report and that previously considered that consideration of this proposal has involved finely balanced judgements. Compromises have been made in the consideration of the proposal in order to optimise the development potential of this highly sustainable brownfield site and thus contribute to the Boroughs challenging housing targets. It is recognised that sites such as this need to be optimised in order to contribute to housing delivery and minimise encroachment into the Borough's Green Belt and other protected designations.
- 1.39 It is also considered that the social benefits of the proposal carry significant weight in favour of the proposed development. Further economic and social benefits include employment during construction, as well as the continued and improved use of local services and facilities.

- 1.40 It is considered that the conflicts identified with other Development Plan policies, as identified in the analysis section of this report, would not on their own or cumulatively significantly and demonstrably outweigh the benefits of the proposed development.
- 1.41 Having regard to the aforementioned comments, and the original reports presented to the Planning Committee on 18th January 2022, if so minded, it is considered Members could give more weight to the current housing circumstances, the need for additional homes and how the development would contribute to meeting this need, and the 100 units of affordable housing proposed and if so minded, resolve to grant planning permission subject to a S106 legal agreement and conditions.
- 1.42 This report should be read in conjunction with the report prepared for the Planning Committee on 18 January 2022 which is appended to this report.

2. Recommendation

- 2.1 That the Head of Development Management be authorised to GRANT planning permission subject the completion of a s106 Agreement and the following conditions:
1. Standard 3-year time limit
 2. In accordance with approved plans.
 3. Construction Management Plan.
 4. Non road mobile machinery
 5. Details of Levels
 6. Contaminated land survey and remediation scheme
 7. Updated Flood Risk Assessment including flood evacuation plan
 8. Details of a sustainable urban drainage strategy.
 9. SuDS verification report.
 10. Details of surfacing materials.
 11. Detailed of external materials – samples on site.
 12. Site waste management plan.
 13. Details of boundary treatments.
 14. Details of a soft landscaping plan.
 15. Details of ecological enhancements.
 16. Details of the green roof.
 17. Details of external lighting.
 18. Details of the construction of access junctions and highway alterations.
 19. Energy statement – 40% carbon dioxide emission improvements

20. Submission of energy performance certificate
21. Submission of BREEAM accreditation (Excellent) – design and post occupancy stage
22. Cycle storage
23. Details of refuse storage facilities including facilities for the recycling of waste to be provided within the development.
24. Delivery and servicing plan.
25. The A4 unit or commercial unit hereby approved shall not be occupied until details of the proposed extractor flues serving the unit in question (if required) and passing up through the building have been submitted to and approved in writing by the local planning authority.
26. No pipes or vents (including gas mains and boiler flues) shall be constructed on the external elevations unless they have first been submitted to the Local Planning Authority and approved in writing.
27. The pub unit hereby approved shall not be occupied until details of the acoustic performance of any plant and extracts and an appropriate scheme of noise mitigation has been submitted to and agreed in writing by the Local Planning. These details should include a specification of flue extractors proposed including details of the odour emissions and sound emissions from the extractor.
28. 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)).
29. Notwithstanding the information provided in the Groundwater Technical Note 1945-A2S-XX-XX-TN-Y-0001-02 15/09/2021, the development shall not commence until a final Groundwater FRA has been submitted to and approved in writing by the Local Planning Authority. The details shall include:
 - a) On site geological investigations demonstrating the depth of the water table with respect to the finished basement level. The groundwater monitoring should be conducted in winter to determine the higher groundwater levels
 - b) Determination of the groundwater flow directions as a result of the geological investigations
 - c) Specific mitigation measures to ensure the basement will be safe from flooding and will not increase flood risk elsewhere

REASON: To minimise flood risk in accordance with Policy CP28 of the Core Strategy and Policies 5.12 of the London Plan, DMD Policy 62 and the NPPF

30. Notwithstanding the information provided in the SuDS Addendum 17/09/2021, the development shall not commence until a Sustainable Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The details shall be based on the disposal of surface water by means of a sustainable drainage system in accordance with the principles as set out in the Technical Guidance to the National Planning Policy Framework and should be in line with our DMD Policy SuDS Requirements:
 - i) Shall be designed to a 1 in 1 and 1 in 100-year storm event with the allowance for climate change, or Qbar

- ii) Provide source control for the majority of the site in the form of green roofs, rain gardens and permeable paving
- iii) Follow the London Plan Drainage Hierarchy and maximise the amount of infiltration and above ground storage before below ground storage is utilised
- iv) Should maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value
- v) 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
- v) Clear ownership, management and maintenance arrangements must be established

The details submitted shall include levels, sizing, cross sections and specifications for all drainage features

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy, DMD Policy 61, and Policies 5.12 & 5.13 of the London Plan and the NPPF and to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value

31. Prior to occupation of the development, a Verification Report demonstrating that the approved drainage / SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include:
- Photographs of the completed sustainable drainage systems
 - Any relevant certificates from manufacturers/ suppliers of any drainage features
 - A confirmation statement of the above signed by the site manager or similar

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

- 32. Archaeology - Stage 1 written scheme of investigation
- 33. Opening hours of flexible commercial units
- 34. No roller shutters to be fixed to the external face of the building
- 35. Permitted development restrictions on use of flexible spaces.

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| LONDON BOROUGH OF ENFIELD | | |
| PLANNING COMMITTEE | | Date: 18 th January 2022 |
| Report of Head of Planning - Vincent Lacovara | Contact Officer: Andy Higham Eloise Kiernan | Ward: Upper Edmonton |
| Ref: 20/01742/FUL | | Category: Major Dwellings |
| LOCATION: 50-56 Fore Street, London, N18 2SS | | |
| PROPOSAL: Redevelopment of the site involving demolition of the existing building and the erection of a new development comprising a residential use (Class C3) with flexible community/commercial space at ground floor (Class A1/A3/A4/D1), creation of landscaping and associated works. | | |
| Applicant Name & Address: Social Capital Partners Fore Street Ltd C/o agent | | Agent Name & Address: DP9 100 Pall Mall London SW1Y 5NQ |
| RECOMMENDATION: 1. That subject to the completion of a S106 Agreement to secure the obligations set out in this report, the Head of Development Management/Planning Decisions Manager be authorised to GRANT planning permission subject to conditions. 2. That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report. | | |
| | | |

1.0 Note for Members

- 1.1 At the meeting of Planning Committee on 26th October, Members were minded to refuse planning permission but resolved to defer making a final decision to enable officers to prepare detailed reasons for refusal based on the concerns identified at the meeting. The reasons to be brought back to a future Planning Committee for consideration.
- 1.2 During the discussion, Members identified three grounds of concern:
- i) the bulk, mass and height of the development relative to setting and appearance of the Fore Street Conservation Area which did not outweigh the public benefits of the scheme.
 - ii) the residential mix and the number of 1- and 2-bedroom residential units as opposed to family units for which there is the greatest local need.
 - iii) the height, bulk and design of the proposed development relative to the impact on the character and appearance of the area
- 1.3 Following the resolution of Planning Committee, the Applicant responded to the concerns identified by Members with the following offer to revise the current planning application:
- An increase in the number of family units to 20% at London Affordable Rent (from 14 x 3b units to 22 x 3 bed units)
 - A decrease in the number of units 113 to 110.
- 1.4 This new information was presented to Planning Committee on 23rd November alongside draft reasons for refusal contained in a Part 2 report. After consideration Members confirmed there was merit in the proposed amendment warranting further assessment in an additional report to Planning Committee. As a result, the application was again deferred to enable the additional information to be assessed.
- 1.5 This report on the proposed development has been updated to reflect the assessment of the additional information and Members are requested to consider the same in light of the offer to increase the percentage of family units to 20% and whether having regard to the presumption in favour of approving sustainable development and the tilted balance, this outweighs the concerns previously identified.
- 1.6 For clarification, this planning application is categorised as a “major” planning application and in accordance with the scheme of delegation, is required to be reported to Planning Committee for determination.

2.0 Executive Summary

- 2.1 The report seeks approval for the redevelopment of the site involving demolition of the existing building and the erection of a new development comprising a residential use (Class C3) with flexible community/commercial space at ground floor (Class A1/A3/A4/D1), creation of landscaping and associated works.
- 2.2 The starting point for the determination of any planning application is the development plan and the need to determine planning application in accordance with the development plan. It is clear this is a development in a sensitive location wherein the relationship to a number of heritage assets and

the wider townscape needs to be carefully assessed in accordance with relevant legislation, guidance and policy.

- 2.3 This application also has to be considered in the light of the Housing Delivery Test and the need for housing to meet the Council's strategic housing targets, triggering the tilted balance in any assessment and the presumption that planning permission should be granted unless:

“(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (7); or

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

- 2.4 As identified, designated heritage assets are listed as areas or assets of particular importance and thus need careful consideration. In this connection and the assessment in this report, it is concluded the development would cause 'less than substantial harm' to identified heritage assets. Where there is 'less than substantial harm' to the significance of a designated heritage asset, this should be weighed against the public benefits of the proposal. In this case, the public benefits of the development include:

- i) 110 new residential homes
- ii) 100% of the residential units being genuinely affordable and provided at London Affordable Rent
- iii) an increase in the % of family homes to 20%
- iii) replacement of multi-use commercial space
- iv) enhancement of Clive Avenue to address anti-social activity
- v) employment opportunities during construction
- vi) investment into Fore Street

- 2.5 It is acknowledged that consideration of this proposal has involved finely balanced judgements. Compromises have been made in the consideration of the proposal in order to optimise the development potential of this highly sustainable brownfield site and thus contribute to the Boroughs challenging housing targets. It is recognised that sites such as this need to be optimised in order to contribute to much needed delivery of new homes and to minimise encroachment into the Borough's Green Belt and other protected designations.

- 2.6 It is also considered that the social benefits of the proposal carry significant weight in favour of the proposed development. Further economic and social benefits include employment during construction, as well as the continued and improved use of local services and facilities.

- 2.7 Overall it is considered the application proposes a high-quality residential development on existing underutilised, highly sustainable brownfield land. It is acknowledged that due to the quantum of homes proposed and the resultant extent of site coverage there are shortcomings to the proposal as identified in the analysis section of this report. However, it is also recognised that there is a pressing need for housing, including affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. In this context the provision of 110 homes all of which would be delivered at

London Affordable Rent represents a significant contribution and weighs heavily in favour of the development despite the acknowledged deficiencies with the proposal.

- 2.8 In conclusion, and giving weight to the need for development which provide new homes, it is concluded that the development for reasons set-out within this report, to broadly accords with the adopted policy framework as well as relevant emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule, and within the Section 106 Agreement, the application is recommended for approval.

3. Recommendation

- 3.1 That conditional planning permission is GRANTED subject to the completion of a S106 planning agreement.

Conditions

1. Standard 3 year time limit
2. In accordance with approved plans.
3. Construction Management Plan.
4. Non road mobile machinery
5. Details of Levels
6. Contaminated land survey and remediation scheme
7. Updated Flood Risk Assessment including flood evacuation plan
8. Details of a sustainable urban drainage strategy.
9. SuDS verification report.
10. Details of surfacing materials.
11. Detailed of external materials – samples on site.
12. Site waste management plan.
13. Details of boundary treatments.
14. Details of a soft landscaping plan.
15. Details of ecological enhancements.
16. Details of the green roof.
17. Details of external lighting.
18. Details of the construction of access junctions and highway alterations.

19. Energy statement – 40% carbon dioxide emission improvements
20. Submission of energy performance certificate
21. Submission of BREEAM accreditation (Excellent) – design and post occupancy stage
22. Cycle storage
23. Details of refuse storage facilities including facilities for the recycling of waste to be provided within the development.
24. Delivery and servicing plan.
25. The A4 unit or commercial unit hereby approved shall not be occupied until details of the proposed extractor flues serving the unit in question (if required) and passing up through the building have been submitted to and approved in writing by the local planning authority.
26. No pipes or vents (including gas mains and boiler flues) shall be constructed on the external elevations unless they have first been submitted to the Local Planning Authority and approved in writing.
27. The pub unit hereby approved shall not be occupied until details of the acoustic performance of any plant and extracts and an appropriate scheme of noise mitigation has been submitted to and agreed in writing by the Local Planning. These details should include a specification of flue extractors proposed including details of the odour emissions and sound emissions from the extractor.
28. 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)).
29. Notwithstanding the information provided in the Groundwater Technical Note 1945-A2S-XX-XX-TN-Y-0001-02 15/09/2021, the development shall not commence until a final Groundwater FRA has been submitted to and approved in writing by the Local Planning Authority. The details shall include:
 - a) On site geological investigations demonstrating the depth of the water table with respect to the finished basement level. The groundwater monitoring should be conducted in winter to determine the higher groundwater levels
 - b) Determination of the groundwater flow directions as a result of the geological investigations
 - c) Specific mitigation measures to ensure the basement will be safe from flooding and will not increase flood risk elsewhere

REASON: To minimise flood risk in accordance with Policy CP28 of the Core Strategy and Policies 5.12 of the London Plan, DMD Policy 62 and the NPPF

30. Notwithstanding the information provided in the SuDS Addendum 17/09/2021, the development shall not commence until a Sustainable Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The details shall be based on the disposal of surface water by means of a sustainable drainage system in accordance with the principles as set out in the Technical Guidance to the National Planning Policy Framework and should be in line with our DMD Policy SuDS Requirements:
- i) Shall be designed to a 1 in 1 and 1 in 100 year storm event with the allowance for climate change, or Qbar
 - ii) Provide source control for the majority of the site in the form of green roofs, rain gardens and permeable paving
 - iii) Follow the London Plan Drainage Hierarchy and maximise the amount of infiltration and above ground storage before below ground storage is utilised
 - iv) Should maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value
 - v) 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
 - v) Clear ownership, management and maintenance arrangements must be established

The details submitted shall include levels, sizing, cross sections and specifications for all drainage features

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy, DMD Policy 61, and Policies 5.12 & 5.13 of the London Plan and the NPPF and to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value

31. Prior to occupation of the development, a Verification Report demonstrating that the approved drainage / SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include:
- Photographs of the completed sustainable drainage systems
 - Any relevant certificates from manufacturers/ suppliers of any drainage features
 - A confirmation statement of the above signed by the site manager or similar

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

32. Archaeology - Stage 1 written scheme of investigation

33. Opening hours of flexible commercial units

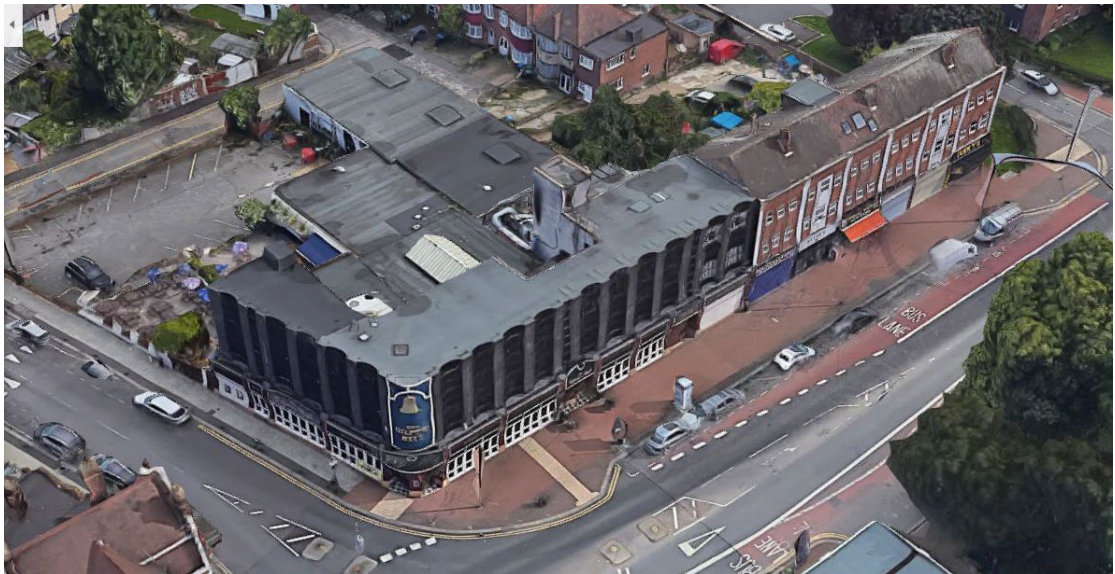
34. No roller shutters to be fixed to the external face of the building

35. Permitted development restrictions on use of flexible spaces.

3.2 That delegated authority be granted to the Head of Development Management/Planning Decisions Manager to finalise the wording of the s106 obligations and the conditions.

4.0 Site and Surroundings

4.1 The application site is situated on the south eastern corner of the junction of Fore Street with Claremont Street and Grove Street. The site which is currently occupied by the former Gilpin Bell Public House, is bounded by Fore Street, Claremont Street and Clive Road.



4.2 The site is situated within the Angel/ Edmonton district centre and is located at the southernmost end of Fore Street, a short distance from the Borough boundary with LB Haringey. It is also situated within the Upper Lea Valley Opportunity Area

4.3 The public house comprises a 3 storey / part single storey building containing a public house on the ground floor with ancillary accommodation at the upper floor. The site is reasonably level with a rear yard serving as a parking area.

4.4 The surrounding area is mixed in character. Fore Street by its nature is predominantly commercial, although there are residential uses over the upper floors and there are various high rise residential developments dispersed around the area, the most prominent of which is the new Silverpoint (9-storeys) development which lies a short distance north of the site.

4.4 The site has a PTAL rating of 5, and has an area of approximately 2760sqm or 0.276ha.

4.5 The application site is not in a conservation area but is adjacent to the Fore Street Conservation Area. To the north on the opposite side of Claremont Street lies the LT Bar while diagonally opposite the site across Fore Street (on the corner of Grove Road), lies the former County Court building. Both of these are locally listed. The public house is identified as having a negative

impact on the setting of the Conservation Area in the adopted Fore Street Conservation Area Character Appraisal.

- 4.6 The site lies in Flood Zone 1.
- 4.7 The Site also sits opposite a petrol filling station. Proposals have previously been granted for the redevelopment of the site involving a 9 storey tower. Whilst the planning permission has expired, this indicates an acceptance of changes to the townscape in this locality.

5. Proposal

- 5.1. The planning application seeks planning permission for the demolition of the existing Public House and redevelopment to include the erection of a part 18, part 4 storey development to provide 110 residential units (Class C3) with 267 sq.m of flexible community/commercial space at ground floor (Class A1/A3/A4/D1) together with creation of amenity space, landscaping and associated works.
- 5.2 The development would provide 100% affordable housing all of which would be delivered at 100% London Affordable Rent. As a result, the proposal qualifies as a “ fast track” application in accordance with the requirements of Policy H5 of the adopted London Plan. No viability assessment is therefore required. The residential mix now comprises 30 x 1-bed, 58 x 2-bed, and 22 x 3+ bed units. Of these larger family sized units, 7 are 4 bed, 6 person houses and 5 are 3 bed 4 person houses. The previous mix was 35 x 1-bed, 65 x 2-bed, and 14 x 3+ bed.
- 5.3 The development would comprise of a tripartite facade to include part four and part 18 storeys with a defined plinth / base element to third floor to demarcate the entrances to serve both residential and commercial elements. This would give the impression of three sections, base, middle and crown. The building would incorporate art deco inspired detailing. It would be predominantly constructed of brickwork with the use of other materials such as zinc and aluminium to provide detailing and architectural relief. The flat roof design would incorporate 120 sq. m of intensive green roof and 224 sq. m of extensive green roof.
- 5.4 Residential access to the tower element would be from Clairemont Street while the family houses would have direct access from both Claremont Street and Clive Road.
- 5.5 The development would also incorporate landscaped areas, private amenity space and child play space within the site. All units within the tower would have their own private amenity space served by balconies alongside access to the 542 sq.m of communal (courtyard) space, including 124 sq.m of child play space (0-4 years) at ground floor level and mezzanine level to the north at the junction with Fore Street and Claremont Street. The main courtyard area would comprise 340 sq.m of permeable paving, 150 sq.m of planted trees in natural soil and 28 sq.m of flower rich perennial planting.
- 5.6 The development would be car free and on-street servicing would be provided along Fore Street and Claremont Street. These areas would also be used for deliveries and refuse collection. There are four parking spaces to serve disabled users provided on Clive Avenue. Cycle storage facilities would be

provided both within the shared private amenity space, and within the first floor of the tower. Each terrace house would have its own private cycle storage to provide a total of 206 spaces. Furthermore, three additional on street cycle stands would be provided for visitors on Fore Street within close proximity to both main entrances.

- 5.6 The basement level would serve the emergency escape, plant room, generator, cold water storage and wet riser tank.
- 5.7 The originally submitted scheme was for 112 build to rent units with a 35% affordable housing at Discounted Market Rent.

6. Relevant Planning History

- 6.1. 18/00760/FUL - Redevelopment of site involving demolition of existing buildings to provide a part 2-part 9 storey block of 68 residential units comprising (30 x 1 bed, 26 x 2 bed and 12 x 3 bed) with balconies and terraces together with 2 commercial units (A1/A2 unit and A4 Public House unit) on the ground floor with car parking, landscaping and associated works – pending. This was granted at Planning Committee on 11 July 2018 subject to discussion with applicant regarding contributions to CCTV and Air Quality Monitoring, the Head of Development Management / Planning Decisions Manager be authorised to grant planning permission subject to the conditions set out in the report and clearance of Section 106 Agreement by Chair, Vice-Chair and Opposition Lead
- 6.2 17/00815/FUL - Redevelopment of site involving demolition of existing buildings to provide a part 4-part 7 storey block of 58 residential units comprising (17 x 1 bed, 24 x 2 bed and 17 x 3 beds with balconies and terraces together with 2 commercial units (1X A1 or A2 unit and 1x A4 Public House unit) on the ground floor with car parking, landscaping and associated works. (Amended Description) – refused for the following reasons, and allowed on appeal:
 - 1. Notwithstanding the viability information provided, it is considered that the proposal fails to provide the maximum reasonable amount of affordable housing for a development of this scale, contrary to policies 3.11 and 3.12 of the London Plan (2015), Policies CP3 and CP39 of the Core Strategy and DMD 1 and DMD 3 of the Development Management Document.
 - 2. The proposed development particularly due to high density, together with its architectural approach, bulk, scale, mass and design, would result in the introduction of an overly intensive form of development. This would be detrimental to the character and appearance of the area, to the adjacent listed buildings and the Fore Street Conservation area. The development fails to integrate satisfactorily with its surroundings and would result in the introduction of a visually prominent form of development out of keeping with the surrounding area. It is thus considered that the proposal fails to take the opportunities available for improving the character and quality of the area, contrary to Policies CP5 and CP30 of the Core Strategy, Policies DMD6, DMD8, DMD10, DMD37 and DMD38 of the Development Management Document, London Plan Policies 3.4, 7.4 & 7.6 and the NPPF.

3. The proposed development would result in the generation of additional traffic and parking pressures on the local and strategic road network, adding to existing traffic and parking capacity issues. In this respect the development would be contrary to Policy 6.13 of the London Plan, CP 24 and CP30 of the Core Strategy and Policy DMD 45 and DMD 47 of the Development Management Document.
4. The proposed development due to lack of communal amenity space and children's on-site play space, taken together with the inclusion of winter gardens rather than balconies, due to the design constraints, would fail to provide sufficient and meaningful external amenity space, resulting in a poor quality living environment for future residents. The proposal would be contrary to CP30 of the Core Strategy (2010), 3.5, 3.6 of the London Plan (2015), the London Housing SPG and DMD 8 and DMD 9 of the Development Management Document (2014).

6.3 Within the Appeal Decision, the Inspector concluded the following:

- Whilst the proposed building would be prominent and large, it would not be overly large compared to the existing tall buildings within the vicinity, including the 8 storey Silverpoint development between Alpha Road and Cowper Road. The architectural design would also make a positive contribution to the character and appearance of the area
- The development would be significantly taller than nearby historic buildings, including the two locally listed buildings and would add to the enclosure of the southernmost part of the conservation area. The heritage assets would be more hemmed in by tall modern development which would add to the sense of an isolated remnant of historic development along Fore Street. However, this harm would be tempered by the separation provided by width of Claremont Street and the variation in heights and materials provided by the development. Views into the conservation area along Fore Street to the south would not be greatly impeded and the prominence of the County Court and no. 58 would remain. Furthermore, the extent and scale of existing modern development in the vicinity of the most southernmost part of the conservation area and the two local listed buildings means that the introduction of an additional tall building would not be particularly out of keeping. Therefore, the harm to significance would be less than substantial and no greater than moderate.
- From the evidence submitted, the provision of 12 affordable units would be the maximum reasonable amount in this instance. The proposed split of tenure between social rent and shared ownership falls within the percentages within the Core Strategy, DMD and London Plan and thus is deemed acceptable.
- Based on the site-specific circumstances and the proposed mitigation measures, it was concluded that the proposed development would have an acceptable impact on transport and parking.
- The proposed development does not include any communal external space; however, each duplex house and a number of flats would meet or exceed the private amenity space requirements as set out in policy DMD9 for dwellings without access to communal space. The urban district centre location makes it difficult to accommodate any meaningful provision of communal space on site. Furthermore, the

applicant has offered a contribution of £25,000 towards amenity space provision within the vicinity of the site. This could be targeted towards an appropriate site such as Florence Hayes Adventure Playground. The contribution would be necessary, directly related and fair and reasonable in scale and kind. Notwithstanding the lack of on-site communal space, the balconies and terraces proposed for each unit would provide a meaningful amount of private external space and a generous amount for some flats on the 4th to 6th floors. The use of winter gardens would be necessary for flats on the inside corner of the development at the rear to ensure privacy between adjoining flats. Para 2.4.15 allows of the DMD allows for such types of external space. It was concluded that they would provide a reasonable amount of private space for this development and would be in addition to the provision of balconies for those specific flats. It is therefore concluded that the proposed development would have an acceptable impact on the living conditions of future occupiers in terms of the provision of private and communal external space.

7. Consultations

Pre Application Engagement

7.1 As part of the pre application process, the Applicant was encouraged to engage with the local community about their proposals. This was undertaken through on line engagement promoted through the distribution of flyers and social media to communicate the proposed development to the residents and the wider community was organised. The consultation organised by the Applicant saw 1,006 people visit the website and 53 people filled in the online survey.

7.2 The key findings were:

- 70% either agreed or were neutral that the development would improve the quality of rental accommodation in the area;
- 62% agreed, are neutral or undecided with the plans being car-free;
- 72% said that landscaping and efforts to minimise the environmental impact of new housing was important to them;
- Those who were surveyed were split 50/50 when asked if they thought the proposed height was appropriate for the area. 49% of respondents saying the height was not appropriate and 51% of respondents agreed that height was appropriate or remained neutral or undecided.

Statutory and non-statutory consultees

Internal

7.3 Traffic and Transportation

No objection in principle to the development in terms of it being car free and the potential impact on the surrounding highway network subject to appropriate conditions, s106 legal agreement and a S278 agreement for highway works.

Highway Services have advised that:

- As stated in CLP, “The temporary construction crossover extension and parking bay suspensions will require a traffic management order.” Developer is required to get in contact with HDCrossovers@enfield.gov.uk to apply for the Heavy Duty Crossover extension. We can also guide the developer with parking bay suspensions as required.
- There are major road works planned to commence in early September on Fore Street junction with Claremont Street. Works are permitted for 3-4 Weeks, during these works developer to avoid use of Fore Street route for their deliveries as much as possible.
- Construction Traffic restricted hours to be between 09:30hrs to 15:30hrs.
- Regarding covered walkway and gantry level, this would have to be looked in a greater detail by highway officer and NRSWA team.
- Please advise developer to provide photographic condition survey of the public roads and footway leading to the site including Clive Avenue.

7.4 SuDS Officer

Having received additional information on Groundwater Flood Risk Assessment and the Drainage Strategy, no objection is raised subject to conditions.

7.5 Environmental Health

No objections, subject to conditions relating to as there is unlikely to be a negative environmental impact. However, conditions are recommended with respect to construction dust, contamination, sound insulation, acoustic report, and non-road mobile machinery.

External

7.6 Metropolitan Police -Designing out Crime Officer

Conditions are requested requiring the developer to submit additional details demonstrating further detail on how the building will be designed to achieve Secured by Design accreditation.

7.7 Transport for London

No objections and comments are summarised as follows:

- A revised trip generation assessment should be provided and agreed with TfL. The applicant should update the assessment using relevant TRICS data from the past five years, with 4 or 5 examples for each use type (affordable housing, market housing, and commercial). The trip generation should be split out by mode, line, station and direction of travel.
- The applicant should work with Enfield Council to expand the Controlled Parking Zone.

- Cycle parking should be redesigned to ensure easy access for all people and for a variety of cycles. Cargo cycle parking should be provided in the public realm to enable active freight. Additional spaces should be provided to meet the minimum standards set out in the Intend to Publish London Plan.
- The Delivery and Servicing Plan should be amended to show how active freight will be encouraged and enabled.
- A full Construction Logistics Plan should be secured by condition

7.8 Greater London Authority

In principle, there is support for the scheme which delivers 110 residential units at 100% LAR. However, a number of points are highlighted

Principle of development

The redevelopment of the site within an opportunity area and district town centre to provide a residential-led mixed use development is strongly supported. The applicant is required to demonstrate that the proposal would suitably secure re-provision of the public house

Housing

The scheme has been amended to include 100% affordable housing with funding provided by the GLA.

Urban design and heritage

The proposed layout and massing strategy is legible; however, the proposed bulk and materials could be further refined. (This has been picked up in more recent revisions). There would be less than substantial harm to heritage asset, which could be outweighed by the public benefits of the scheme, namely the provision of affordable housing units and public realm improvements that collectively could be a catalyst for the regeneration of the district centre. An amended fire statement should be submitted.

Transport

The applicant should submit a revised trip generation assessment. The applicant should work with Enfield Council to expand the Controlled Parking Zone. Additional cycle parking is required to meet the minimum standards. Cycle parking should be redesigned to meet LCDS standards and provide space for cargo bikes. A revised Delivery and Servicing Plan is required to demonstrate inclusion of active freight. A Construction Logistics Plan and Delivery and Servicing Plan should be secured by condition or Section 106 agreement, as appropriate.

Sustainable development

Further information is required in respect of energy, water, and urban greening matters.

7.9 Haringey Council

An objection is raised due to the effect of the development in terms of its height, on the setting of the nearby Conservation Area within the Borough of Haringey

7.10 Thames Water

No objections in regard to wastewater network and sewerage treatment works subject to conditions for piling method statement and source protection strategy, alongside informatives.

7.11 Historic England (Archaeology)

No objections subject to conditions for Stage 1 written scheme of Investigation (WSI),

7.12 CAMRA

No comments received.

7.13 London Fire & Emergency Planning Authority

The London Fire Brigade commented that the fire safety approach for the scheme is satisfactory and the dry risers proposed on each floor of the building will be discussed further during the consultation on the building regulation submission.

7.14 Enfield Disablement Association

No comments received

7.15 NHS London – Health Urban Development Unit

No comments received

7.16 Historic England

No comments received

7.17 Design Review Panel

7.17.1 The conclusions from the March 2019 DRP are as follows:

- The principle of developing a distinctive corner at the junction of Fore Street and Claremont Street is supported. This is an opportunity to reference elements of the area's historic character in the detailed design.
- The developer's business model, based on working with local authorities to provide homes that are suitable for local area needs, is novel and potentially ground-breaking. It could play a valuable role in enabling the regeneration of Snell's and Joyce estates by providing decanting opportunities.
- As Fore Street and Angel Edmonton start to undergo extensive change through development the proposed development on this key site will play an important role in setting the standard of development for the wider area and must be of a high quality.

- A comprehensive study of Fore Street and the wider area led by the Council is required to help understand the capacity for growth and how it can be accommodated into the townscape.
- There is a need to further justify the approach to height through contextual analysis and improved design quality. Consideration needs to be given to the requirements of Policy 7.7 of the London Plan on the location and design of tall and large buildings.
- there is a need for great articulation for example, making better use of recessed balconies
- the significant proportion of dual aspect dwellings on the north and east blocks is welcomed, as is the wide, generous deck access overlooking a landscaped, communal amenity space.
- The principle of providing commercial frontages onto the high street is supported. This could include a retained updated licensed establishment and/or community facilities. It will be important to create outlets that fulfil a number of purposes in order that they will be active each day and not just on occasions when Tottenham Hotspur are playing at home.
- The ground floor uses should be prominently marked using appropriately dimensioned floor to ceiling heights, potentially to mezzanine level.
- The development should contribute to the improvement of the surrounding public realm. Clive Avenue could be converted into a home zone or play street and the access to businesses improved through improvements to street surfaces and use of street furniture and public art.
- The determination of height needs to be framed by a contextual analysis of the townscape and heritage impact and the new context emerging from proposed developments in the vicinity. Design development should incorporate these factors to provide the justification for a tall building when assessed against lower height alternatives.
- A significant and distinctive building may be appropriate to provide a 'marker' at the end of the high street; however, the main townscape objective should be to help knit the street and surrounding areas together.
- There is concern at the single aspect apartments serviced off these internal corridors, particularly those facing north west on to the traffic of Fore Street and which feel somewhat disconnected from the rest of the community. The design team is encouraged to investigate introducing deck access on this block as an option to both increase the amenity of the circulation space and the potential for more dual aspect apartments.
- The high proportion of dual aspect dwellings in the north and east blocks is welcomed. Relocating the balconies within the taller element of the building, which are currently north-facing, to the corners of the apartments would enable a dual aspect balcony to be achieved.
- Overall the approach could be articulated further to become more successful - more inset balconies and less of a monolithic appearance would help soften the overall appearance of the building.

7.17.2 In response to these and Urban Design / Heritage comments, the emerging scheme was developed whilst seeking to maintain viability and optimise the delivery of new homes in the is sustainable town centre location.

7.17.3 In October 2021, the scheme was considered again by the DRP. They comment that:

- The design of the tower has improved since the previous review, having a more elegant form but is still bulky and would benefit from further improvement;
- The panel agrees the building is too tall, out of scale for the context and damages the heritage of the area;
- Overall the proposal is overdevelopment. This results in an incongruous height and massing which is not appropriate for the context. Fundamentally the design does not represent a bespoke response or relate to the character of the conservation area; both in terms of the materiality and also the vertical, on the street design of the tower, which is more appropriate for a city centre location than an outer London Borough town centre on a linear route.
- The proposal will set a precedent for height along the east side of Fore Street that undermines the height strategy being promoted at Joyce and Snell's (across the street) and in the Council's emerging local plan.
- The inclusion of the townhouse typology is welcome. These relate well to the low-rise context and are high quality.
- The colonnade is not supported as there are potential practical issues around secure by design as well as the design not integrating with the character of the street.
- The proposals are balanced between a need for affordable housing in the Borough and the need for high quality design that works with the local context and heritage. The panel's comments are focused on the design aspects of the scheme and are intended to add to the information that the LPA is considering in the determination process.
- Reference was made to the scale and massing of surrounding buildings (particularly Silverpoint, 8 storeys and the two towers in Haringey, 22 and 20 storeys) as an argument for a building of substantial height in this area. The panel disagrees and argues that Silverpoint in particular is detrimental to the area and is already overbearing on the high street. The nearby towers in Haringey do not provide any useful urban design context and should not be used as a justification.
- Whilst the site sits within the formally designated town centre it is on the very edge of the designated area. Experientially the site sits at the edge of the town centre. A tall 'marker' building is not appropriate in this location as it is too distant from the core of the centre and transport hubs.
- Locating the tower right on the corner of the site with a strong vertical emphasis detracts from the horizontal and linear kinetic experience of travelling along Fore Street.
- The heritage assets nearby already function as a gateway to the town centre and, due to its scale, the new tower would undermine this function.
- In order to address these issues, the design team is encouraged to explore an option in which the tower is set back from the street and the 3-4 storey plinth is continued to the street corner. Edmonton County Court and Lt's Bar, two landmark buildings mentioned in the conservation area appraisal, will be detrimentally affected by the proposed development because of its height, scale and proximity.

- The colonnade is not working to tie the building into the conservation area and is more appropriate for a city centre location.
- The use of materials does not suggest a bespoke response to either the heritage assets nearby, the setting of the conservation area or the local palette of materials.
- Overall the quality of architectural detailing and material has seen improvement since the previous review.

Public

Neighbours

- 7.17 In respect of the consultation on the scheme as originally submitted (Build to Rent), letters were sent to 1219 neighbouring and nearby properties. In addition, site notices were displayed directly outside and in the vicinity of the site while notice was also published in the local newspaper.
- 7.18 In response, 7 letters of objection were received which raised all or some of the following points:
- Close to adjoining properties;
 - Increase in traffic;
 - Increase of pollution;
 - Loss of parking;
 - Conflict with Local Plan;
 - Loss of privacy to many neighbouring properties;
 - Loss of light to many neighbouring properties;
 - Noise nuisance;
 - Out of keeping with character of area;
 - Over development;
 - Strain on existing community facilities-already lacking in adequate open spaces;
 - Affects local ecology;
 - Development too high;
 - More open space needed on development;
 - Limited greenery and open spaces within the local area
- 7.19 In addition, we have received several more detailed contributions from local residents which are set out here:
- Several buildings within the local area are referenced within the supporting documents, two of which, (the tallest) are in neighbouring Haringey, as evidence of a wide variety of heights in the area - this is supposed to be support for the height of their 18-storey plan. The majority of the structures cited have been the subject of regeneration talk for many years - those specific buildings are not deemed as having a positive visual impact; their form is not something to be replicated. Amongst the lowest of the buildings cited is Prowse Court at 8 stories which was a re-development of the Highmead Estate in Angel Edmonton, whereas the current application is for the demolition of a structure that is in keeping with the scale of its surrounding buildings. The proposed development is out of scale and overbearing;

- The position of the site means that the proposed development will loom over the public street and road, dwarfing everything around it, including trees and pedestrians, and casting a long shadow. In some of their mocked-up photos, the natural shadow of the existing building can be seen and gives an indication of the shadow that would be thrown by this development. The imposing height has no sympathy for the value of human scale and the relationship of a community to its surrounding buildings;
- This building will be a landmark feature. Positioned as it is on a key corner at the entry to Angel, Edmonton, it will set the tone for the neighbourhood and any hopes for future well designed builds. If the intention is to reflect the tone of a neighbourhood already struggling, then its materials, ugliness and height fit the bill;
- A car-free development is not going to mean a reduction in traffic. People will still have cars and will use them. This is already a very high-volume traffic area and even the slightest increase in traffic will be detrimental to the community and the environment and put added pressure on the roads. The increase in traffic as a result of this development will not be slight;
- Car-free developments might be desirable for an area in theory (although only three disabled car parks - what happens when a long-term resident becomes disabled and all spaces are claimed?) but people will still have cars. This is a large development. It will be a nuisance for residential roads and disruptive for existing residents as they compete for car park space and endure an influx of cars circling for spaces, adding even more noise and pollution to an area already struggling with that. The inadequacy of appropriate car park facilities will have a significant impact on the area.
- Good design enhances communities; the visual environment has a psychological effect. The development will do nothing to enhance this particular urban environment which desperately needs an attentive design eye and a sympathy for humanly scaled buildings. The materials of the building are not in keeping with the surrounding buildings and the height of the building only serves to emphasise that. It cannot be claimed that its dominating, visual impact on the view of pedestrians, passing motorists and residents will be a positive one. The development does nothing to draw upon the positives of the surrounding buildings but expressly seeks out the negative; The lack of parking will not only impact on Claremont Street, Ingleton Road and the surrounding roads where parking is often difficult; It will also negatively impact local residents and the activities of the church, but also the businesses in Fore Street where customers park and also use the Edmonton County Court.
- Easy access to public parkland will be very important for the health and wellbeing of future residents of the development, especially as the development is high density housing in a built-up area with limited access to suitably sized outdoor space. However, the application says the residents will be able to access Pymmes Park, which is a 14-minute walk away and is located on the other side of the north circular, so is unlikely to be frequently used. The application also mentions Florence Hayes Recreation Ground as a space for residents - my understanding is that Florence Hayes Recreation Ground was closed approx. 4 years ago due to the grounds not being safe and the large play equipment had to be removed. The grounds were also used by

gangs as a meeting point and drug paraphernalia was found on the grounds. The space is not opened to the public so cannot be included as open space for future residents.

- About 11% of the units would be 3 bed + vs. a policy requirement of 60% and the SHMA 2015 assessed need of 50%, therefore, the proposal does not sufficiently address local needs (e.g. help to reduce overcrowding);
- Some units appear to be under the Gross Internal Floor Area standards - it appears the applicant may be adding the balcony areas to the measurements in some cases, which shouldn't be included in internal floor space calculations;
- Rebuilding on The Gilpin will be a great loss to the areas history and heritage assets. It will damage the historical corridors of Edmonton. This is also the boundaries of Tottenham & Edmonton. Where Edmonton ends with its historical corridor and Tottenham begins with its historical corridor;
- There are already huge problems with prostitution, begging and drug dealing within this area
- The development will further drain the existing local resources such as schools, health care, policing etc, which are already saturated.

8. Relevant Planning Policies

8.1 National Planning Policy Framework

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

8.2 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
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D11 Safety, security and resilience to emergency
- D12 Fire safety

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| D14 | Noise |
| HC6 | Supporting the night-time economy |
| HC7 | Protecting public houses |
| G5 | Urban greening |
| G6 | Biodiversity and access to nature |
| G7 | Trees and woodlands |
| SI 1 | Improving air quality |
| SI 2 | Minimising greenhouse gas emissions |
| SI 3 | Energy infrastructure |
| SI 4 | Managing heat risk |
| SI 5 | Water infrastructure |
| SI 8 | Waste capacity and net waste self-sufficiency |
| SI 12 | Flood risk management |
| SI 13 | 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 |
| T6.5 | Non-residential disabled persons parking |
| T7 | Deliveries, servicing and construction |
| T9 | Funding transport infrastructure through planning |
| DF1 | Delivery of the Plan and Planning Obligations |
| M1 | Monitoring |

8.3 Local Plan - Overview

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

8.4 Core Strategy (2010)

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

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| CP2 | Housing Supply and Locations for New Homes |
| CP3 | Affordable Housing |
| CP4 | Housing Quality |
| CP5 | Housing Types |
| CP9 | Supporting community cohesion |
| CP11 | Recreation, leisure, culture and arts |
| CP20 | Sustainable energy use and energy infrastructure |

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| CP21 | Delivering sustainable water supply, drainage and sewerage infrastructure |
| CP24 | The road network |
| CP26 | Public transport |
| CP25 | Pedestrians and cyclists |
| CP28 | Managing flood risk |
| CP30 | Maintaining and improving the quality of the built and open environment |
| CP31 | Built and Landscape Heritage |
| CP32 | Pollution |
| CP46 | Infrastructure Contribution |

8.5 Development Management Document (2014)

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

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| 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 |
| DMD16 | Provision of New Community Facilities |
| DMD17 | Protection of Community Facilities |
| DMD27 | Palmers Green District Centre |
| DMD30 | Floorspace above Commercial Premises |
| DMD32 | Managing the Impact of Food & Drink Establishments |
| DMD34 | Evening Economy |
| DMD37 | Achieving High Quality and Design-Led Development |
| DMD44 | Conserving and Enhancing Heritage Assets |
| DMD45 | Parking Standards and Layout |
| 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 |
| DMD56 | Heating and Cooling |
| DMD58 | Water Efficiency |
| DMD59 | Avoiding and Reducing Flood Risk |
| DMD60 | Assessing Flood Risk |
| DMD61 | Managing Surface Water |
| DMD62 | Flood Control and Mitigation Measures |
| DMD64 | Pollution Control and Assessment |
| DMD65 | Air Quality |
| DMD66 | Land Contamination |
| DMD68 | Noise |
| DMD69 | Light Pollution |
| DMD70 | Water Quality |

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| DMD73 | Children's Play Space |
| DMD79 | Ecological Enhancements |
| DMD80 | Trees on Development Sites |
| DMD81 | Landscaping |

8.6 Enfield Draft Local Plan

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

8.6.2 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. Nevertheless, it is worth noting the growth strategy identifies New Southgate and Upper Lea Valley Opportunity Area as a potential option for a key location for growth. The draft Local Plan states that the Council will work with the Mayor to bring forward the OAPF.

8.6.3 The Council consulted on a draft Local Plan (Regulation 18) during the summer of 2021. The draft Local Plan includes site allocations and a number of place based policies, with a particular focus on growth areas such as Meridian Water. It is anticipated that following this consultation a final draft plan (Regulation 19) will be published in 2022, with submission to the Secretary of State for examination in public anticipated during 2023 and adoption in 2023/24.

8.6.4 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.

8.6.5 Key emerging policies from the plan are listed below:

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

8.7 Other relevant policy and guidance

National Planning Practice Guidance (NPPG) 2019
Enfield Climate Action Plan (2020)
Enfield Intermediate Housing Policy (2020)
Enfield Decentralised Energy Network Technical Specification SPD (2015)
TfL London Cycle Design Standards (2014)
GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
GLA: London Sustainable Design and Construction SPG (2014)
GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
GLA: Housing SPG (2016)
GLA: Affordable Housing & Viability SPG (2017)
Healthy Streets for London (2017)
Manual for Streets 1 & 2, Inclusive Mobility (2005)
National Design Guide (2019)
Fore Street Angel Conservation Area Character Appraisal (2015)

8.8 Housing Delivery Test and Presumption in Favour of Sustainable Development

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

“(c) approving development proposals that accord with an up-to date development plan without delay; or
(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (7), granting permission unless:
(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (6); or
(ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

8.8.2 Footnote (7) 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.”

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

8.8.4 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.

- 8.8.5 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.
- 8.8.6 In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 we met 77% of the 2,394 homes target for the three-year period delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target and we now fall into the “presumption in favour of sustainable development” category.
- 8.8.7 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. However, where a development having regard to the policies in this Framework that protect areas or assets of particular importance, causes harm, this can provide a clear reason for refusing the development proposed
- 8.8.8 Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

9. Analysis

- 9.1. This report sets out an analysis of the issues that arise from the proposals in the light of adopted strategic and local planning policies. The main issues are considered as follows:
- Principle of Development
 - Housing (including affordable and tenure mix)
 - Impact on Character of Area (Tall Building & design)
 - Impact on Setting and Appearance of Conservation Area
 - Internal Layout / Residential Quality
 - Impact on Neighbouring amenity
 - Transportation (Parking, Access and Servicing)
 - Sustainable Construction
 - Landscaping, biodiversity and trees
 - Environmental considerations

Principle of Development (Land Use)

- 9.2. The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise. Furthermore, the National Planning Policy Framework (NPPF) states development proposals that accord with the development plan should be approved without delay.
- 9.3 The Development Plan includes local policies (Core Strategy / Development Management Plan) as well as the London Plan (2021) and national guidance. The London Plan policies will have greater weight where they are inconsistent with local policy given its more recent adoption in March 2021.
- 9.4 Running alongside the presumption that proposal in accord with the development should be approved, is the aim that planning should facilitate sustainable development. This is at the heart of the NPPF which advocates a presumption in favour of sustainable development. In particular, at paragraph 118 the NPPF advocates the promotion and support for the development of under-utilised land and buildings, especially where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 9.5 Such an approach to maximise the efficient use of land, is consistent with the adopted London Plan which states at Para 1.2.2 of the London Plan
- “The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.”*
- 9.6 Para 1.1.4 of the London Plan also states:
- “Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspaces in accessible locations, built forms that work with local heritage and identity, and social, physical and environmental infrastructure that meets London’s diverse needs is essential if London is to maintain and develop strong and inclusive communities”.*
- 9.7 These strategic planning ambitions are captured in Policies GG1 (Building Strong & Inclusive Communities), GG2 (Making the best use of Land) , GG3 (Creating a Healthy City) and GG4 (Delivering the Homes Londoners Need) with the proposal needing to be viewed in this policy context. These London Plan policies are also consistent with Strategic Objective 5 set out in the Core Strategy
- 9.8 Making more efficient use of land is presently significant due to the identified need for housing and the consequences of failing to meet the Housing Delivery Test which has triggered the “tilted balance” and the presumption in favour (NPPF) which for decision-taking, means granting permission unless any adverse impacts of doing so would significantly and demonstrably

outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan.

- 9.9 The location within a district town centre with good PTAL makes this a suitable site for more intensive development consistent with the good growth policies of the London Plan and should be site where development is optimised to realise necessary housing delivery. Although little weight can be attributed to the fact given the status of the draft plan, it can be noted that the site is also identified in the Council's Regulation 18 Local Plan as a site allocated for redevelopment (SA16: 50-56 Fore Street).
- 9.10 It is acknowledged the property in its current form is of limited architectural merit and makes a negative contribution to the setting and appearance of the Conservation Area. It is considered the site incorporates opportunity to obtain a more intensive form of development to assist in strategic policy objectives around growth
- 9.11 In light of the above, the principle of demolition including the loss and provision for replacement of the existing public house is therefore considered acceptable. This approach has also been established by previous planning decisions (ref: 18/00760/FUL and 17/00815/FUL) which included acceptance on appeal. It is also considered the proposed mix of residential together with ground floor commercial (A1/A3/A4 and D1 floorspace) is acceptable in principle and would be consistent with the character and designation of the locality

Loss of Public House

- 9.12 The primary use of the existing building is as a public house (Use Class A4). These can often be valued assets of benefit to the local community although it must be noted, this public house is not designated as an Asset of Community Value.
- 9.13 Policy HC7 of the London Plan (Protecting public houses) states that public houses should be protected where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future. This approach would also be consistent with Policy DMD 17 which seeks to protect community facilities within the Borough.
- 9.14 The current premises (the Gilpen Bell PH) is closed and has been for some time. Although the initial plans proposed involved the complete loss of the pub use, following negotiations with the applicant, the proposal has been amended and floorspace is now identified within the development with frontage onto Fore Street that could be used to provide a new public house should this be economic. The floorspace is otherwise flexible so that it could be used for alternative uses within the A1/A3 and D1 use class to facilitate the most suitable use for the local area, which is welcomed.
- 9.15 The approach is considered acceptable against Policy HC7 of the London Plan and is also considered reasonable given the proximity of an alternative

public house on the opposite side of the Claremont Street / Fore Street junction.

Residential

- 9.16 With specific regard to the residential element of the proposal, it is noted that the NPPF sets out the government's objective to boost the supply of homes. The NPPF also states an intention to ensure that supply meets the needs of different groups in the community, including an affordable housing need. Policy GG4 of the London Plan supports this intention, stating that planning and development must 'ensure that more homes are delivered'.
- 9.17 Policy H1 of the London Plan notes the importance of encouraging residential development on appropriate windfall sites, especially where they have a high PTAL rating (ratings 3 to 6) or are located within 800m of a tube station. The Council's Core Strategy (4.1 Spatial Strategy), identifies that sustainable locations for development would be concentrated in town centres, on previously developed land and that new homes will be planned through the intensification of land uses. The Mayor's Affordable Housing and Viability SPG also sets out the intention to bring forward more public land for affordable homes.
- 9.18 NPPF (Paragraphs 102 and 103) sets out objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport, and requires development be focused on locations which are sustainable and can offer a range of transport modalities to help reduce congestion and emissions and improve air quality and public health. In this regard, the development site is considered to be in an accessible and sustainable location with good connections to local social infrastructure, bus routes and reasonable walking distance to Silver Street over ground station.
- 9.19 The proposal is for 110 residential units on a site where the emerging Local Plan(Reg 18) has identified potential to introduce new housing. The Boroughs housing delivery targets have been set by the GLA and the Draft London Plan states that Enfield is required to provide a minimum of 12,460 homes over the next 10 years (1,246 per annum), in comparison to the previous target of 7,976 for the period 2015-2025.
- 9.20 According to the Enfield Housing Trajectory Report (2019), during the previous 7-years the Borough has delivered a total of 3,710 homes which equates to around 530 homes per annum. Furthermore, given the new target of 1,246 per annum the Borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs, as is the case here.
- 9.21 The Council is currently updating its Local Plan and through publishing the Issues & Options (Regulation 18) in 2019 and the draft Local Plan (Regulation 18) in 2021 has been transparent about the sheer scale of the growth challenge for Enfield. The two most recently published Regulation 18 documents in 2019 and 2021 were clear about the need to plan differently to attain a significant step change in delivery and secure investment in our Borough. The Council needs to encourage a variety of housing development including market, affordable and Build to Rent products, in order to meet varied local demand.

- 9.22 In relation to sustainable development the proposal is considered to respond to the objectives of the NPPF by redeveloping a brownfield site; by providing homes that are accessible to social and transport infrastructure and easily accessible to local amenities; by providing a range of housing to support a mixed and balanced community; and by having due regard to the local natural, built and historic environment. It is also considered that the proposed number of residential units on the site would contribute to providing housing to assist in meeting the Borough's housing target and help bridge the shortfall that has been the case in previous years.
- 9.23 Significant weight must also be attributed to the presumption in favour of approving sustainable residential development and the planning merits of providing new homes (including 100% offer of affordable homes) and additional A1/A3/A4/D1 floorspace.

Summary of Principle

- 9.24 Given the above considerations, the principle of development is considered to be acceptable and in line with relevant policies, most notably London Plan Policy G2 & G4, Core Strategy Policy 4.1, DMD Policy 28, the Mayor's Affordable Housing & Viability SPG and Paragraphs 59, 102 and 105 of the NPPF. As such the Development is supported in principle terms subject to other detailed considerations as discussed below.

Housing Need and Delivery

- 9.25 The current London Plan sets a target for the provision of 52,287 new homes across London each year with Enfield identified as contributing a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the previous target of 798. Notwithstanding, only 51% of approvals in the Borough have been delivered over the previous 3-years meaning that unit approvals must exceed this figure considerably if the targets are to be met.
- 9.26 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious draft now adopted London Plan (2021) targets.
- 9.27 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.

- 9.28 The fourth and fifth ambitions of the strategy are in respect of Inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.
- 9.29 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the London Plan seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 9.30 As mentioned elsewhere in this report, Enfield is a celebrated green Borough, with close to 40% of our Borough currently designated Green Belt or Metropolitan Open Land, and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. The reality of these land designations means the call on optimisation of our brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to transform.
- 9.31 In 2016/17, 30% of housing completions were affordable, whilst in 2017/18 this decreased to 7% of housing completions being affordable, amounting to 37 units in total being delivered. These figures show that the target 40% affordable housing delivery is not currently being met in the Borough. The Housing and Growth Strategy (2020) sets out an ambition to increase the target of 50% of new homes to be affordable housing in the next Local Plan. Enfield's Housing and Growth Strategy (2020) states the Borough's ambition to develop more homes that are genuinely affordable to local people, so more people can live in a home where they spend a more reasonable proportion of their household income on housing costs.
- 9.32 Taking into account both the housing need of the Borough together with the track record of delivery against target, it is clear that the Council must seek to optimise development on brownfield sites such as this particularly those that are currently underused and not delivering any benefit to the wider area.

Affordable Housing

- 9.33 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The NPPF defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". London Plan Policy H4 sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable.
- 9.34 Enfield sets a Borough-wide affordable housing target of 40% in Core Policy 3 but acknowledges the appropriate figure will need to take into account site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.
- 9.35 DMD 1 supporting text notes that affordable housing comprises three tenures: social rent, affordable rent, and intermediate housing. Enfield's Development

Management Document Policy DMD 1 (Affordable Housing) states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need.

- 9.36 Following discussions, the proposed development as revised, would now deliver 100% affordable housing with all the units available at London Affordable Rent in excess of policy requirements. This is achieved through the allocation of grant funding from the GLA.
- 9.37 Previously the development was presented on the basis of Build to Rent scheme delivering 112 residential units of which 35% would be affordable homes by habitable room. The viability review identified that this exceeded what the development reasonable sustain without grant. As a result, the scheme has been amended so that 100% of the 110 proposed residential units are affordable housing at London Affordable Rent, with funding provided by the GLA.
- 9.38 Due to the 100% affordable offer, Policy H5 (Threshold approach to applications) identifies this as a fast track application. Fast tracked applications are not required to provide a viability assessment at application stage.
- 9.39 To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the Borough).
- 9.40 A qualifying criterion does require the local planning authority to be satisfied regarding the tenure mix with Policy H5 stating: Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the Borough or the Mayor where relevant.
- 9.41 Policy H6 of the London Plan (Affordable Housing Tenure) advises that the following split of affordable products should be applied to residential development:
- 1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
 - 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
 - 3) the remaining 40 per cent to be determined by the Borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- 9.42 The 2017 SHMA shows London's significant need for low-cost rental housing which is reflected in priorities for our own Borough; There is therefore presumption that the 40 per cent to be decided by the Borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.
- 9.43 In this instance the tenure mix of 100% London Affordable Rent is acceptable. The London Plan is committed to delivering genuinely affordable housing and

within the broad definition of affordable housing, the Mayor's preferred affordable housing tenures includes London Affordable Rent.

- 9.44 London Affordable Rent is for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. Rents are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF.

Summary of Housing Tenure & Mix

- 9.45 The proposed Affordable Housing offer of 100% is based on residential units. Tenure mix is set out below.

| Tenure | 1b2p | 2b4p | 3b4p/5p | 4b6p | |
|------------------------|------|------|---------|------|-----|
| London Affordable Rent | 30 | 58 | 15 | 7 | 110 |
| Private Rent | 0 | 0 | 0 | 0 | 0 |
| | | | | | |
| Subtotals | 30 | 58 | 15 | 7 | 110 |
| | | | | | |

- 9.46 A further breakdown of the residential mix is set out below:

| Type of Unit | Number of Units |
|-----------------------------|-----------------|
| 1 Bed, 1 Person Units | 0 |
| 1 Bed, 2 Person Units | 29 |
| 1 Bed, 2 Person Units (DDA) | 1 |
| 2 Bed, 3 Person Units | 28 |
| 2 Bed, 3 Person Units (DDA) | 3 |
| 2 Bed, 4 Person Units | 26 |
| 3 Bed, 4 Person Units | 5 |
| 3 Bed, 4 Person Units (DDA) | 5 |
| 4 Bed, 6 Person Units | 7 |
| Total | 110 |

Residential Mix

- 9.47 Officers have assessed the scheme in accordance with London Plan (2021) policies as well as having regard to the Council's development plan policies and the Council's current and emerging evidence around housing need. It is acknowledged the proposed mix is significantly weighted towards the 1 & 2 bedroom units which is not immediately consistent with local need and as a result there would be a preference for more larger family accommodation. The proposal has been revised increasing the number of family sized units to 22 which represents 20% of the total facilitated by a decrease in the number of smaller 1 and 2 bedroom units. This change is welcomed and it is considered this improve the acceptability of the proposed residential offer. Nevertheless, the proposed mix has to be acknowledged. This, however, does have to be viewed in the context of the housing delivery test and the presumption in favour of approving sustainable development. Moreover, the current offer of 100% affordable housing at London Affordable Rent is significant and can be attributed considerable weight in the assessment
- 9.48 Furthermore, it is noted that the Council as the Strategic Housing Authority supports this application as it secures the delivery of 100% affordable housing. The SHA comments:
- “that the social housing will be subject to 100% nominations to the Council which will help to meet the needs of people on the housing register. The concentration of 1 bed and 2 bed accommodation is high as, overall, there is a need for more family housing in the Borough. Although the scheme proposes 11%, these are houses. The highest demand is currently for 3 beds and 6 persons and therefore the provision of houses is welcomed in a town centre location. Therefore, on balance, the Council as Strategic Housing Authority, supports this application given the site context and affordable housing offer”.*
- 9.49 Taking this into account, and the tilted balance in favour of approving schemes for residential development, it is considered the low percentage of family housing can be accepted but only in the context of the location and the 100% LAR affordable housing offer which would be secured through a legal agreement.

Design

- 9.50 The main element of the current iteration of the scheme following recent design enhancements, is the 18 storey tower.
- 9.51 It comprises 3 elements -base , mid elevation and crown.

Base:

- Three-storey order with well defined entrances and generous glazing.
- Removal of the colonnade to be in keeping with the surrounding context and increase flexible space at ground floor plan.
- Articulation of flexible space corner entrance to enhance way finding

Mid Elevation

- Material change to a softer red brick with a red tone within the zinc roof cladding

- Slender overall appearance expressed through the 4 central bays and dematerialising the corners.
- Large windows and wide piers generate a strong overall architectural appearance.
- Curved balconies to soften the overall massing and reference the art deco heritage and the Gilpin Bell.

Crown:

- Stepped height to create more verticality and create a slender form
- Expressing the white detailing down the facade creates a slender form and more defined tower



Elevation View of Proposal From Fore Street

9.52 In addition to the tower element, the proposal involves terraced dwellings fronting Claremont Street and Clive Avenue.

Claremont Street

- Expressed vertical element through framing each house with brick piers
- High level of family houses with terrace level private amenity space and shared amenity space in the centre of the site.

- Material changes to a softer red brickwork

Clive Avenue

- 7 Terrace houses with defensible space and improved streetscape to Clive Avenue.
- Provided roof terrace private amenity space and shared amenity space in the centre of the site.
- Setback mansard roof reduces appearance of scale to mediate surrounding residential context.



9.53 Following the recent Design Review Panel in October 2021, the scheme has been amended to:

- remove the three storey colonnade enabling the tower to be better grounded in the street scene
- further elements of horizontal detailing have been introduced to improve its setting and tie in with adjacent buildings
- introduction of predominately red brickwork (revised from grey tones)
- Vertical emphasis to architectural detailing of tower to accentuate slenderness
- introduction of articulation between base and mid elevation

- vi) introduction of curved corner balconies to further reduce mass and accentuate slenderness of tower
- vii) Art deco inspired detailing – high quality

9.54 The proposals also involves significant public realm enhancement of Clive Avenue



and will address the current public experience of this space.

Design development

- 9.55 The proposed scheme has undergone a number of iterations throughout a long pre-application process, which has included extensive pre-application discussions with officers, GLA officers, local people and the Enfield Design Review Panel (DRP).
- 9.56 There has been significant debate as officers seek to navigate an appropriate development response on this sustainable town centre location, balancing the sensitivities of the heritage and urban design considerations against the objective to deliver new homes and the need to maintain a viable quantum of development.
- 9.57 In this regard, it is acknowledged that the previous 9 storey development has not progressed to implementation because it is not viable. It is also of interest to note that when assessing the appeal against the Council's refusal, the Planning inspector commented that *" whilst the proposed (9 storey) building would be prominent and large, it would not be overly large compared to the existing tall buildings within the vicinity, including the 8 storey Silverpoint development between Alpha Road and Cowper Road. The architectural design would also make a positive contribution to the character and appearance of the area"*.
- 9.58 The Planning Inspector also commented that *while the development would be significantly taller than nearby historic buildings, including the two locally*

listed buildings and would add to the enclosure of the southernmost part of the conservation area. The heritage assets would be more hemmed in by tall modern development which would add to the sense of an isolated remnant of historic development along Fore Street. However, this harm would be tempered by the separation provided by width of Claremont Street and the variation in heights and materials provided by the development. Views into the conservation area along Fore Street to the south would not be greatly impeded and the prominence of the County Court and no. 58 would remain. Furthermore, the extent and scale of existing modern development in the vicinity of the most southernmost part of the conservation area and the two local listed buildings means that the introduction of an additional tall building would not be particularly out of keeping. Therefore, the harm to significance would be less than substantial and no greater than moderate.

- 9.59 Nevertheless, this is a taller building and there remain concerns about the height and design articulated by the Design Review Panel which reiterate urban design and heritage comments. Throughout, the Design Review Panel has acknowledged positive elements of the scheme including the terraced form / design of Claremont Street / Clive Avenue properties and the materiality and articulation of elements. However, the conclusion of the recent DRP was that although there are positives about the development, in respect of the tower, it was felt to be too tall and out of scale for the context and damages the heritage of the area. There is also concern that the proposal will set a precedent for height along the east side of Fore Street that undermines the height strategy being promoted at Joyce and Snell's estate (across the street) and in the councils emerging local plan. Notwithstanding, the DRP recognised that *the proposals are balanced between a need for affordable housing in the Borough and the need for high quality design that works with the local context and heritage. The panel's comments are focused on the design aspects of the scheme and are intended to add to the information that the LPA is considering in the determination process*"
- 9.60 Since this DRP in October, the scheme has further evolved and although the height remains unaltered, the developer has introduced revisions which seek to address many of the comments that were made at the DRP. These are discussed in the following sections of the report.

Impact on Character of Area (Tall Building)

- 9.61 The NPPF at Para 119 states Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, in a way that makes as much use as possible of previously-developed or 'brownfield' land. Para 124 of the NPPF also states that planning decisions should support development that makes efficient use of land, taking into account:
- 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.
- 9.62 The proposed development represents a tall building 18 storeys in height (= 73.99metres). The remaining development is 3 storey in height fronting Claremont Street and Clive Avenue. However, the tower would be a significant addition to the townscape.
- 9.63 The London Plan advises that while high density does not need to imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing necessary future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. It is also considered that tall buildings that are of exemplary architectural quality and in the right place, can make a positive contribution to London's cityscape. Many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design.
- 9.64 In fact, the Report on Location of Tall Buildings and Important Local Views in Enfield (2012) prepared in support of the current Core Strategy states within the general considerations: 'As a general rule buildings significantly taller than their surroundings are unlikely to be appropriate within or in close proximity to conservation areas, historic parks and gardens, listed buildings and ancient monuments
- 9.65 London Plan Policy D9 states that Boroughs should determine through their local plan if there are locations where tall buildings may be appropriate and proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Tall buildings should only be developed in locations that are identified as suitable in Development Plans. The current development plan for the Borough does not identify suitable locations for tall buildings pursuant to the requirements of London Plan Policy D9. It can be noted that the Council's draft Reg18 local plan does make proposals and identifies land on the western side of Fore Street focused on the Joyce and Snell's residential estate, as an appropriate location for tall buildings. In so doing it suggests a height of up to 15 metres as being appropriate.
- 9.66 While the application site is located outside of this area, the boundary for the "appropriate location" extends to the opposite side of Fore Street. It should also be noted that there are tall buildings at 22 and 20 storeys to the south across the Borough boundary with Haringey in addition to the 9 storey Silverpoint building to the north. The urban contexts requires consideration when assessing the appropriateness of height and the impact of the proposed tall building needs to be balanced against to the need for housing the presumption in favour of approving sustainable (tilted balance).

- 9.67 DMD Policy 43 (Tall Buildings) is a criteria-based policy for considering tall buildings, which justifying text (para. 6.4.1) defines as those “that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.” It states that tall buildings will not be acceptable in areas classified as inappropriate which includes sites in the immediate vicinity of conservation area unless it can be demonstrated how the proposal avoids the negative impacts associated with the sensitive classification
- 9.68 Both the London Plan and DMD tall building policies are relevant to the proposed development. The policies can be distilled into two questions:
 i) is the proposal in the right location,
 ii) is it of high quality?
- 9.69 Acceptability of a taller building in a particular location will be dependent on the detailed local context including the design of the building, the relationship to neighbouring properties, the relationship with any heritage assets and the impact on any views including those to and from historic buildings over a wide area. This requires careful consideration should be given to the potential negative impact that the introduction of a taller building might have. As always, it is necessary to assess and evaluate the merits of individual proposals and exceptionally it may be possible for an applicant to demonstrate that an exemplary designed taller building is acceptable within or close to nationally or locally designated heritage assets.
- 9.70 While the site is located in a town centre and has good public transport accessibility, the location of a tall building has generated a range of views and from an urban design perspective, there are strong concerns about whether this location for a tall building is appropriate questioning the justification on the basis of townscape legibility and its role as a focal point for development at the gateway to the Borough. In this regard, the concerns relate to the height of the tower as proposed would have a negative impact on the legibility of the Borough, particularly in medium and longer views when experienced as part of the Borough’s existing townscape. This is because the proposed scheme would be visually prominent and indicate a level of importance in the Borough which is not appropriate to the particular site
- 9.71 In addition, the height analysis demonstrated in the D&S indicates that in the locality of the site, the average height of the taller buildings is 9 storeys. There are 10 tall buildings identified with 3 of the 10 buildings exceeding the height of 9 storeys, two of which are in the Borough of Haringey (20 + storeys).
- 9.72 Bridport House (College Gardens, Upper Edmonton N18 2TB) is one of the 9 storeys identified. It is located on the Joyce and Snells Estate further along Fore Street and is identified in The Report on Location of Tall Buildings and Important Local Views in Enfield (2012) as a ‘Yellow’ rating, meaning it is an appropriate location for a tall building but is an inappropriate existing tall building. The location of this building is closer to the boundary of Enfield and Haringey and can be considered as a ‘gateway’ location into the Borough rather than this site.
- 9.73 In support of the scheme, the applicant has provided a townscape analysis which considers the impact of the proposed development on the townscape and heritage assets. The townscape assessment analyses the character of the surrounding townscape, assessing the effect of the proposed

development on views from locations around the site. This draws on the design quality and references the proposed height in the context of other tall buildings in the vicinity to conclude the development would be appropriate and would not harm the existing townscape. In particular, it has assessed the proposed development in a number of key views including that identified as Local View 10: a view from the pedestrian bridge over Meridian Way (A1055) and the railway line at Ponders End. Tall buildings within the Borough and beyond towards the City of London are visible and although the new tower is apparent, it is not considered to be a significant feature detracting from established views.

9.74 In considering the issue of height, the recent Design Review Panel (October 2021) considered that:

- the building is still too tall and out of scale for the context and damages the heritage of the area.
- the proposal is overdevelopment. This results in an incongruous height and massing which is not appropriate for the context.
- the design does not represent a bespoke response or relate to the character of the conservation area; both in terms of the materiality and also the vertical, on the street design of the tower, which is more appropriate for a city centre location than an outer London Borough town centre on a linear route.
- The design of the tower has improved since the previous review, having a more elegant form but is still bulky and would benefit from further improvement. This could involve exploring a set back from the street, so the tower does not sit directly on the edge of the site but rather presents a 3-4 storey frontage to the street.
- The colonnade was not supported
- The proposal will set a precedent for height along the east side of Fore Street that undermines the height strategy being promoted at Joyce and Snells (across the street) and in the councils emerging local plan.

The Panel did acknowledge however that the proposals are balanced between a need for affordable housing in the Borough and the need for high quality design that works with the local context and heritage.

9.75 Overall, there remained concerns that the design of the tower did not support the proposed height in this location. In response, the scheme has been further revised.

- i) the colonnade has been removed so that the tower interacts better with the street scene;
- ii) new materials have been introduced using warmer brick tones
- iii) improved articulation of the crown element of the tower
- iv) introduction of a strong coping line to articulate the distinction between the base and tower elements
- v) introduction of curved balconies to create a softer form and improved appearance

It is considered these alterations substantially improve the design and appearance of the development and now make the scheme acceptable.



9.76 With reference to DMD 43 and taking the view this is an appropriate location, the policy acknowledges that the actual suitability of a proposal will always depend on the context of the site and details of the proposed building but must:

- a. Have good access to public transport, and/or;
- b. Contain existing and appropriate clusters of tall buildings, and/or;
- c. Are within designated town centres, activity hubs or regeneration areas.

The policy states that in the majority of cases more than one or all of the above criteria and in this case, criterion a and c are met

9.77 The assessment has also had regard to the criteria set out in London Plan Policy D9 including :

- i) development should have regard to the long range, mid-range and immediate views when assessing visual impact
- ii) development should reinforce spatial hierarchy
- iii) architectural quality and materials should be exemplary
- iv) development should have regard to and avoid harm to the significance of heritage assets
- v) development should incorporate a high standard of functional design
- vi) the location must have the transport capacity and network to support the development
- vii) development should be designed to minimise environmental impact including noise, wind, daylight, sunlight penetration and temperature conditions
- viii) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals a

Against these criteria, the proposal is on balance considered acceptable in terms of the introduction of height in this location.

Tall Buildings Conclusion

- 9.78 It is acknowledged there are concerns about the suitability of this site to accommodate a tall building. These needs to be weighed against the benefits in terms housing delivery and 100% London Affordable rent
- 9.79 There is a pressing need for housing, and a London Plan requirement to optimise use of land. The site is in the town centre where policy seeks to optimise development especially where sites have excellent PTAL. Although there is a less than substantial heritage impact (discussed in the next section), no significant local views would be adversely affected by a tall building. It is also considered important that there are other existing tall buildings in the area, and the wider area is undergoing significant change, given proposed estate regeneration schemes nearby. There are also existing consents for a large building on the site; a part 4 part – 7 storey scheme has consent, and there is a resolution to grant for a part 2 – part 9 storey scheme.
- 9.80 Nevertheless, Officers do have concerns that the height of the tall building as proposed would have a negative impact on the legibility of the Borough, when experienced as part of the Borough's existing townscape. In addition, the DRP has expressed concerns about proposed building heights. However as acknowledged by the Design Review Panel this is a finely balanced assessment to be weighed against the delivery of new housing and 110 residential units at London Affordable Rent which must be given significant weight in light of the Housing Delivery Test and the tilted balance. Taking this into account and referencing the recent design improvements to the development, the harm arising from the development is outweighed by the benefits and it is considered the proposed height is acceptable in terms of the townscape character of the area.

Impact on Setting and Appearance of Conservation Area

- 9.81 The application site is not situated in a Conservation Area nor is it locally listed. However, it constitutes a non designated heritage asset which lies adjacent to the southern boundary of the Fore Street Conservation Area. There are designated and non designated heritage assets in close proximity as identified in this report and the effect of the proposed development on the significance of these designated and non designated heritage assets needs careful consideration to assess the harm.

Relevant Policy and Legislation

- 9.82 In respect of conservation area, the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 require that all planning decisions 'should have special regard to the desirability of preserving or enhancing the character or appearance of that area. If harm is identified, it should be given considerable importance and weight in any planning balance in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Chapter 16 of the NPPF (Para 194) states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. It also encourages LPAs to take account of a non-designated heritage asset in determining the application. In weighing applications that affect directly or

indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm.

9.83 The NPPF also states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting.

9.84 Para 197 of the NPPF also states:

"In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness".

9.85 Furthermore, Para 199 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".

9.86 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. This does not mean there is no harm but acknowledges there may be public benefits that outweigh this identified level of harm

9.87 London Plan Policy HC1 'Heritage conservation and growth' states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Furthermore, Enfield Core Policy 31 (Built and Landscape Heritage) requires that special regard be had to the impacts of development on heritage assets and their settings, Enfield Core Policy 30 supports high quality and design-led public realm. DMD 44 (Preserving and Enhancing Heritage Assets) requires that developments should conserve and enhance the special interest, significance or setting of and heritage asset while DMD 37 (Achieving High Quality and Design-Led Development) requires that Development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.

9.88 Historic Environment Good Practice Advice in Planning Note 3 provides information on good practice in relation to assessing impacts on the setting of heritage assets. Of note in the GPA is the inclusion of the consideration of views and whether there would be any impact to the significance of the views

on the heritage asset as a result of the development. However, it is of note that a distinction is made between views that contribute to heritage significance and those valued for other reasons. Furthermore, Historic England guidance entitled *The Setting of Heritage Assets, 2015* states: *“Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building’s original designed landscape or the removal of structures impairing views of a building.” [p.4]*

Heritage Context & Assessment

- 9.89 The application site is not situated in a Conservation Area nor is locally listed. However, it constitutes a non designated heritage asset which lies adjacent to the southern boundary of the Fore Street Conservation Area. It also lies within the Upper Edmonton Archaeological Priority Area. The character, appearance and special interest of the Conservation Area is analysed in the associated Character Appraisal (2016). By virtue of its height and consequential widespread visibility, the proposed redevelopment has the potential to impact upon designated and non-designated heritage assets within a wider area. This includes a number of non-designated heritage assets in close proximity to the site: The Phoenix Pub (former); Edmonton County Court; 60 Fore Street; 79 Fore Street; St James’s Church (former); and the Parsonage (former).
- 9.90 The Church Street (Edmonton) and Fore Street Conservation Area Character Appraisal identifies the following to be of special interest:
- The sense of time depth, which comes primarily from the survival of both the medieval church of All Saints and a significant number of 18th and 19th century buildings
 - The inherent architectural quality of the landmark commercial and public buildings of around 1900, when Fore Street became the ‘high street’ for extensive suburban development in its hinterland
 - The diversity of historic styles and materials represented, although with a strong emphasis on yellow stock and red brick, with slated or tiled roofs, as the dominant materials
 - The open green spaces around All Saints Church, as a foil to the heavily trafficked streets
 - By contrast, the vitality of Upper Fore Street as a diverse and multi-cultural shopping centre.
- 9.91 In addition, the special interest of the Fore Street CA relates to the retail vibrancy of Fore Street, the surviving pockets of 19th century buildings, and corners marked by landmark buildings. Views up and down Fore Street also contribute to its special interest with the existing tall buildings visible along Fore Street being an established part of that setting.
- 9.92 Of note is that the CAA identifies as a focal point the concentration of historic buildings either side of Fore Street – the LT’s Bar (the former Phoenix Public

House, late 19th century) and the Magistrates' Court (early 20th century). It marks the gateway to the section of Fore Street that has buildings (mostly, but not exclusively, both historic and retail) to pavement edge both sides of Fore Street. Views of the focal point are of more significance than views from it. A number of buildings along Claremont Street are also identified as making a positive contribution.

9.93 A further consideration in the assessment of harm is that the Fore Street Conservation Area has been identified as being in 'very bad' condition in Historic England's annual Heritage at Risk Register. The purpose of the register is to identify heritage assets at risk of being lost through neglect, decay or deterioration. With regards to Conservation Areas, loss would be defined as neglect, decay or deterioration to the extent that its special interest, character and appearance were to be compromised so that it no longer justifies designation. As such, the character, appearance and special interest of the Fore Street Conservation Area can be considered extremely fragile.

9.94 In accordance with its statutory obligations, a Management Plan (2016) has been published which identifies key issues and management proposals for the preservation and enhancement of the Conservation Area. A number of the issues identified relate to new development:

- *The poor quality of many new buildings and their lack of positive relationship to context,*
- *The need to achieve a higher standard of new-build contextual design in infilling gap sites and in redevelopment,*
- *The need to ensure that investment in commercial enterprises results in good standards of building design.*

To address this, Enfield Council has proposed:

- *The poor quality of new building design has been a major factor in the erosion of the character of the areas. New buildings within and forming the setting of the conservation areas should only be allowed if they are be carefully designed to reflect the historic character, use, scale, grain and appearance of the conservation areas.*

9.95 When assessing which may affect the setting of a heritage asset, the cumulative impacts of development may also need to be considered.

9.96 The quality of the design is therefore important to the assessment of harm to the setting and appearance of the heritage assets. The scheme has produced differing opinions concerning the appropriate response to the development of this site having regard to the statutory tests outlined above regarding the harm to the heritage assets which have had to be balanced to be balanced against policy and the objective of delivering sustainable development and new homes.

9.97 The DRP considered that:

- i) that the proposals will inevitably cause harm by virtue of the sheer and massing of the proposals and their proximity to existing heritage

assets and conservation areas. The level of harm is assessed as most likely to be 'less than substantial'

- ii) a tower is not deemed an appropriate design response to this site because of the detrimental impact on the area's heritage assets. If this site were to be developed according to parameters defined by the local heritage, a much lower building would be proposed.
- iii) Night as well as daytime views should be considered. At night the proposed building will have a large, illuminated presence, which will cause greater impact on the setting of the conservation area than may be apparent from the daytime views.
- iv) Edmonton County Court and Lt's Bar, two landmark buildings mentioned in the conservation area appraisal, will be detrimentally affect by the proposed development because of its height, scale and proximity.
- v) The colonnade is not working to tie the building into the conservation area and is more appropriate for a city centre location.
- vi) The use of materials does not suggest a bespoke response to either the heritage assets nearby, the setting of the conservation area or the local palette of materials.

9.98 Notwithstanding the above points, it must be noted that the DRP are of the opinion that the level of harm is assessed as most likely to be 'less than substantial' harm opening up an ability to weigh the harm against the public benefit of the scheme

9.99 The Heritage officer's assessment of this development has also identified concerns. While the level of harm to the Fore Street Conservation Area as a designated heritage asset is concluded to be 'less than substantial', the harm is considered to be at the higher end of less than substantial and would result in harm to the setting and character of the Conservation Area. Nevertheless, it is possible this harm to be weighed against any public benefits of the proposal including, where appropriate, securing its optimum viable use (Para.202). In so doing, it is important to reiterate that whilst the scale of harm may be 'less than substantial', it is considered at the higher end of this scale. In accordance with national planning advice, great weight must be given to the heritage asset's conservation as part of the weighed balancing exercise (Para.199) and clear and convincing justification provided for any level of harm (Para.200). Consideration must be given to past harm caused by previous poor quality interventions which has resulted in the Conservation Area being 'at risk' and the cumulative impact of this proposal alongside others such as Silvermere. Mindful of this, the Heritage Officer considers this development would be contrary to the Conservation Area Management Plan p.10 which are not consistent with local design guidance:

The poor quality of new building design has been a major factor in the erosion of the character of the areas. New buildings within and forming the setting of the conservation areas should only be allowed if they are be carefully designed to reflect the historic character, use, scale, grain and appearance of the conservation areas.

9.100 From a heritage perspective, it is considered the scheme fails to make a positive contribution to local character and distinctiveness (Para.197c). Instead the proposal would significantly erode local character and cause a high degree of harm albeit within the less substantial level. The design is also felt to be inconsistent with aims of the Framework (Para.130) regarding decisions on new development. In particular, a number of elements are of concern:

- Colonnades are not typical of the Fore Street CA whereas a strong back of pavement building line is a positive characteristic. The colonnade, being a double height space, is also out of scale with the prevailing pedestrian experience and which does not reinforce the strong linear retail character at ground floor in the CA. This should be removed
- Improved quality of shopfronts should be introduced so that they relate to the proportions and quality of positive examples in the area. This would include breaking up the double height glazing; increasing the bay widths; defining a signage zone; and, using alternative materials.
- Refining the proportions of the façade above the shopfronts to avoid a monolithic character and establish a finer grain;
- Removing 'grey spandrel panels' which are an unsympathetic material. Contrasting details in the conservation area are generally stone or brick/terracotta;
- Refine massing of Fore Street mansard roof to avoid bulky appearance and change materiality to terne-coated steel;
- Removing the 'grey brick'. Whilst it is acknowledged that brick has been chosen to reflect the tonal qualities of stone in the conservation area, this material prevents the building visually assimilating into the streetscape. Stock brick and stone are used sparingly in the Conservation Area as a complimentary material or for high status buildings. The introduction of such a large expense of this material will undermine this balance;
- Stepping the tower back further behind the Fore Street building line;
- Removing corner balconies which are highly prominent;

9.101 In response to these comments and the conclusions of the DRP, the development has been further revised. These changes include the removal of the colonnade, alterations to the ground level elevations and articulation with the tower element, alterations to the balconies and a change to the materials removing the render / grey colours and introducing orange/red brickwork and materials. It is considered these changes represent a significant enhancement of the proposal.



- 9.102 It is also considered, having regard to the objection from Haringey, that the relationship to the North Tottenham High Road Conservation Area would cause less than substantial harm to its significance.
- 9.103 The Applicant has submitted a Heritage Assessment as part of the Townscape, Built Heritage and Visual Impact Assessment in accordance with NPPF and adopted policy requirements DMD 44, which sets out a clear understanding of the historic environment and background to the heritage-led design development.

Heritage Conclusions

- 9.104 Overall, this proposal replaces a tired building which, according to the Conservation Character Appraisal, has a negative impact on the Conservation Area with a high quality new building, providing much needed homes. The conclusion of the heritage assessment is that there is less than substantial harm to the heritage assets and although there are reservation about elements of the proposed development, these are outweighed by the public benefits of delivering 110 residential units at London Affordable Rent. This balance is reinforced by the presumption in favour of approving sustainable residential development.

Design – Claremont Street / Clive Road frontages

- 9.105 The development comprises new 3 storey elements which front both Claremont Street and Clive Road frontages. At three storeys, the design of these element which provide family homes, is considered acceptable. The activation of the Clive Road frontage and associated public realm improvements are a particular public benefit given the current anti-social activities associated with this location.
- 9.106 It is recognised that from a design perspective, the residential frontages are not set back from the pavement by the recommended 1.5 metres. However, the set back is considered sufficient and not a ground to object to the benefit.
- 9.107 Overall the 3 storey terraces approach in and Claremont Street and Clive Road is supported and welcomed with the DRP also commenting that the

inclusion of the townhouse typology is welcome and that these relate well to the low-rise context and are high quality

Conclusion of Design

- 9.108 On balance, and this is finely balanced given the issues raised, it is considered the proposed design to be acceptable. The conclusion that the proposed development would cause less than substantial harm to the significance of the heritage assets albeit at the upper end of that assessment, allows the consideration of the public benefits to be taken into account. The need for housing and favourable offer of all units being delivered at London Affordable Rent is extremely beneficial and supported by the Housing team of the Council.
- 9.109 The Housing Delivery test has introduced the presumption in favour of approving sustainable residential development and 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. It does not outweigh the protection of heritage assets where there is a clear reason for refusing planning permission but in this case, it is considered the negatives of this development and harm to the heritage assets do not outweigh the significant public benefits.
- 9.110 The relationship to the setting and appearance of the conservation area is therefore accepted.

The Commercial/Community Space

- 9.111 It is proposed to provide 267 sqm of flexible commercial/community space within the ground floor and mezzanine level that fronts on to Fore Street. Although the initial plans proposed involved the complete loss of the pub use, following negotiations with the applicant, the proposal has been amended and floorspace is now identified within the development with frontage onto Fore Street that could be used to provide a new public house should this be economic. The floorspace is otherwise flexible so that it could be used for alternative uses within the A1/A3 and D1 use class to facilitate the most suitable use for the local area, which is welcomed.
- 9.112 The approach is considered acceptable against Policy HC7 of the London Plan and is also considered reasonable given the proximity of an alternative public house on the opposite side of the Claremont Street / Fore Street junction.

Residential Quality and Amenity

- 9.113 The NPPF (Para.12) identifies good design as a key aspect of sustainable development, stating that ‘the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve’. The guidance states that developments should seek to:
- Function well and add to the overall quality of the area for the lifetime of the development;
 - Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Be sympathetic to local character and history;

- Establish a strong sense of place and welcoming and distinctive places; and
- Optimise the potential of the site to provide an appropriate mix and amount of development, green and public space, local facilities and transport networks;
- Create safe, inclusive and accessible spaces with a high standard of amenity and where crime or fear of crime does not undermine community cohesion or quality of life.

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

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

Accessible Housing

9.116 Policy D7 of the London Plan sets out that in order to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that: i) at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The Proposed Development meets relevant criteria in relation to accessible housing and is considered acceptable in this respect.

Housing quality

9.117 All of the units either meet or exceed internal floorspace standards required by the London Plan and comply with the qualitative design aspects to be addressed in housing developments as required. All units would meet residential space standards and would include sufficient private outdoor amenity space. The community spaces also include a range of external amenity opportunity. All ground floor units have defensible space at the front – where they front onto more public areas.

9.118 The Proposed Development would comprise 74% of dual aspect units, with no north facing single aspect units. Within the constraints of the site this is considered to represent a high-quality response. Significantly, all proposed family housing (offered as affordable homes) will be dual aspect, as will all 2-bed homes.

Fire safety

9.119 London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage: "In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire

safety...” Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users. The London Fire Brigade were consulted on the application who confirmed that the fire safety approach for the scheme is satisfactory and the dry risers proposed on each floor of the building will be discussed further during the building consultation. Access for the any fire brigade would be where the proposed loading bay would be sited which is a distance of less than 45m and the positioning of a water hydrant would be near to the loading bay.

Secure by Design

- 9.120 Local Plan DMD Policy 37 require all developments to demonstrate and apply the principles and practices of the Secured by Design Scheme. The Metropolitan Police’s Designing Out Crime Officer (DOCO) has reviewed the scheme and provided that a suite of further detail is required to ensure the safety of residents, visitors and other users of the space. It is recommended that a planning condition be attached to ensure Secured by Design certification for the development or alternatively for the scheme to achieve Crime Prevention Standards.

Residential Amenity Space

- 9.121 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 amenity space.
- 9.122 Overall, it is considered the private amenity proposed is acceptable. Each of the proposed flats would be served by its own self-contained amenity areas either via a terrace/balcony which complies with DMD9 and regional standards set out in the London Plan and London Housing SPG. Furthermore, the residential units onsite would have access to communal amenity space to the rear of the site.

Accessibility

- 9.123 London Plan Policy D7 Requires at least 10% of dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, and ii) all other dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings.’ Local Plan DMD Policy 8 has similar policy objectives.
- 9.124 The London Plan and Enfield Local Plan require all future development to meet the highest standards of accessibility and inclusion. A condition would be attached to any permission to ensure the scheme complies with the Building Regulation requirements.

Relationship to Neighbouring Residential Properties

- 9.125 New development should not adversely impact on the residential amenity of neighbouring residential properties. Policies D1 and D3 of the London Plan set out the importance of ensuring buildings are well designed to ensure against prejudicing neighbouring amenity. Policy CP30 of the Core Strategy seeks to ensure that new developments have appropriate regard to their

surroundings, and that they improve the environment in terms of residential amenity.

- 9.126 The Mayor's Housing SPG (2016) Standard 28 reinforces the need for privacy, providing that planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy but cautions against adhering rigidly to minimum distance requirements.
- 9.127 To maintain a sense of privacy, avoid overshadowing and ensure adequate amounts of sunlight are available for new and existing developments, Policy DMD10 requires new development to maintain certain distances between buildings, unless it can be demonstrated that the proposed development would not result in housing with inadequate daylight/ sunlight or privacy for the proposed or surrounding development.
- 9.128 The nearest residential properties are situated on the opposite side of Clive Avenue to the east and south. There would be a distance of approximately 19 - 31 metres between the side and rear elevations of the new houses on the application site and the front elevations of the houses along Clive Avenue to the east. To the south, there would be approximately 11 metres between the side elevation of the dwellings of the new houses positioned to the rear of the site and the front elevation of the houses to the south of the site located along Clive Avenue. There would be a minimum distance of approximately 26 metres between the rear elevation of the main building sited along Fore Street and the rear boundary of the site, and there would be a 9 – 12 metre distance between the 18 storey element and the southern boundary line of the site. With regard to the properties along Claremont Street there would be a distance between the proposed 18 storey building and existing building (public house on the corner of the site that would exceed 17 metres. With regard to the distance between the row of terraced houses along Claremont Street and the proposed development this would exceed 20 metres.
- 9.129 Whilst it is acknowledged the proposed development would be of a large scale, given the spatial relationship of the development to its surroundings and the distance from neighbouring properties, it is considered the proposed development would not significantly harm residential amenity. A daylight and sunlight report in accordance with BRE guidelines accompanies the application which demonstrates no significant harmful impacts on residential amenity.
- 9.130 In summary, it is considered that the proposed development would not adversely affect the amenity of nearby residential occupiers, through reduced daylight and sunlight conditions, overlooking and loss of privacy, having regard to relevant London Plan policies, Enfield policies, BRE guidelines and the NPPF and the presumption in favour of approving sustainable development.

Traffic and Transportation

- 9.131 The site has a PTAL of 5, which indicates good access to public transport services and supports flexibility in parking requirements in accordance with

London Plan policy. There are bus stops within walking distance from the site. The subject site is on a classified road and the existing pub car park has capacity for vehicles onsite.

Car Parking

- 9.132 The London Plan 2021, Core Strategy and DMD 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. Policy DMD45 requires parking to be incorporated into schemes having regard to the parking standards of the London Plan; the scale and nature of the development; the public transport accessibility (PTAL) of the site; existing parking pressures in the locality; and accessibility to local amenities and the needs of the future occupants of the developments.
- 9.132 The parking standards within the new London Plan states that for areas with a PTAL 5-6, development should be car free. It should also be noted that most recent data shows that 56.5% of households own or have access to a vehicle. This is based on census data from 2011 and is before the Matchday CPZ was introduced.
- 9.133 Traffic and Transportation have reviewed the proposal along with information provided within the Transport Assessment which included information to support the proposed level of car provision proposed in light of London Plan maximum standards, Overall it is considered that a car free development in this location is acceptable, subject to residents being excluded from owning a parking permit for the CPZ, and the developer making a contribution to mitigating the impact of residents not owning vehicles i.e. an increase in cycling, walking, and public transport trips.
- 9.134 Although the proposal is car free, there will be provision of 4 on street disabled parking bays along Clive Ave. No parking spaces are proposed for the commercial unit

Cycle Parking

- 9.135 Cycle parking is shown on the plans to be sited within the building and to the front of the site. A total of 224 spaces are proposed which complies with London Plan standards. However, a condition will be secured to ensure that cycle parking is provided in accordance with London Plan standards.

Access and Servicing

- 9.136 Policy DMD47 states that new development will only be permitted if the access and road junction which serves the development is appropriately sited and is of an appropriate scale and configuration and there is no adverse impact on highway safety and the free flow of traffic.
- 9.137 There is no vehicular access to the development but the proposal has been designed to ensure there is clear and safe access for both pedestrians and cyclists. All deliveries and servicing will take place from Fore Street, Claremont Street and Clive Avenue

- 9.138 Servicing and deliveries to the commercial space expected to take place from the existing loading bays on Fore Street and Claremont Street. Further details concerning the loading bay will need be discussed with Highways, and as this involves works to the highway will also require a section 278 agreement.
- 9.139 The nature and location of the proposal means the development does require the provision of a Construction Traffic Management Plan to minimise its impacts on the local road network. This will be secured by condition. Refuse storage is shown within the building however full details of the storage will be secured through a condition.

Clive Avenue

- 9.140 Clive Avenue is an adopted highway, and is outside of the applicants ownership. Therefore, the works proposed to improve this highway would need to be undertaken via a Section 278 Agreement. The redesign allows what is existing footway to be repurposed as 4xdisabled bays, achieved by bringing the site boundary in slightly and enabling a wider footway. This would require the land offered up to be dedicated as public highway and then adopted. The proposed alterations are welcomed and are an improvement over the existing situation. As well the parking layout the carriageway will be raised, and the surfacing will be upgraded.
- 9.141 The highway works will need be secured via a Section 278. This obligation could be included in the Section 106 (detail to be discussed). Traffic Orders will also be required in order to change the existing waiting restrictions. It is noted that the design is a suggested design at this stage is subject to alterations and agreement with LBE Highways.

S106

- 9.142 In order to mitigate the impacts of the development, in addition to the aforementioned s278 highway works, Traffic and Transportation have sought s106 contributions comprising of, Cycle Enfield and sustainable transport (up to £85k and CPZ permit exclusion).
- 9.143 In summary, the development is considered likely to have a negligible impact on vehicular traffic flows in the local area, subject to conditions and planning obligations. The transport impacts of the proposal are acceptable and in this respect the scheme complies with the relevant London Plan and Enfield policies and the guidance within the NPPF.

Energy and Sustainability

- 9.144 The NPPF (Para. 153) requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping.
- 9.145 Policy SI2 of the London Plan adds Be Seen to the Mayor's energy hierarchy. It sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on Boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). Policy

SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).

- 9.146 Local Plan Policy DMD Policy 51 calls for energy efficient buildings as the first step in applying the energy hierarchy, DPD Policy 52 requires connection to a decentralised energy network where possible, DMD Policy 53 requires the use of zero carbon green technologies and DMD Policy 54 requires financial contributions to off-set carbon where specific targets are
- 9.147 All new development must achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability. All development will be required to include measures capable of mitigating and adapting to climate change to meet future needs having while regard to technical feasibility and economic viability.
- 9.148 London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide (CO₂) emissions in accordance with the following energy hierarchy:
- Be Lean: use less energy;
 - Be Clean: supply energy efficiency; and
 - Be Green: use renewable energy.
 - And also: Be Seen.
- 9.149 A detailed Energy 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.
- 9.150 It is noted that PV panels are shown on part of the flat roof of the new building and the energy statement refers to the use of a ground source heat pump to serve a communal heating system for the dwellings.
- 9.151 The building achieves a 10.9% reduction in CO₂ emissions without any renewable technologies implemented. This is due to passive measures such as the high thermal-efficiency of the building fabric, along with 100% low energy lighting specified throughout. The energy statement sets out that with the addition of a ground-source heat pump system to serve a communal heating system for the dwellings, along with a 0.5 kWp PV array to serve each residential unit (27.5kWp total) and an 8kWp array to serve the commercial areas (35.5kWp site total), the CO₂ emissions would be reduced by a further 29.1%. This results in total site CO₂ emissions of 78.2 tonnes CO₂/annum for the site, and a total 40.0% reduction in CO₂ emissions compared to Building Regulations Part L.
- 9.152 The energy strategy is targeting carbon dioxide emissions through energy efficiency measures and improvements to the building fabric. Further detail should however be provided and this shall be secured through condition to demonstrate the location and specification of the Low and Zero Carbon Technologies selected as feasible for this site, and how this will provide for no less than a 40% improvement in total CO₂ emissions arising from the

operation of a development and its services over Part L of Building Regulations 2013.

- 9.153 The site is within an area that could connect to a Decentralised Energy Network in the future and this connection would need to be secured through a s106 legal agreement. The carbon neutral shortfall will be addressed via Carbon Offset Contributions Payments, secured by legal agreement.
- 9.154 Several conditions relating to climate change and sustainable design and construction have been suggested to address relevant policies within section 8 – Tackling Climate Change of the DMD.

Waste Management

- 9.155 The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. London Plan Policy SI7 encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources. The policy also requires referable schemes to promote circular economy outcomes and aim to achieve net zero-waste.
- 9.156 Local Plan Core Policy 22 encourages the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste while Local Plan Policy DMD 57 sets out detailed criteria and standards. The Council has also prepared Waste and Recycling Storage Planning Guidance. Appropriate conditions will be attached to any permission.

Biodiversity, Trees and Landscaping

- 9.157 The application is supported by an Ecology Report, Tree Constraints Appraisal and landscape plans.
- 9.158 London Plan Policy GG2, G6 and G14 require development to protect and enhance designated nature conservation sites and local spaces, secure net biodiversity gains where possible and incorporate urban greening. Developments resulting in the creation of 100m² of floorspace or one net dwelling or more should provide on-site ecological enhancements having regard to feasibility and viability. Policy DMD79 seeks the provision of on-site ecological enhancements.
- 9.159 The submitted Ecology Report indicated that the existing site is of limited value ecologically given that the majority of it is currently covered by either buildings or hardstanding. The existing buildings were also assessed for the presence of bats and it was concluded that there is limited potential to support roosting bats and no evidence of such roosting taking place. The report included a number of recommendations for further work such as scheduling vegetation and building clearance works between the months of September and February inclusive to avoid impacts on breeding birds.
- 9.160 If approved, conditions/informatives must be attached to ensure details of ecological enhancements such as bat/bird boxes and appropriate landscaping are planted and the recommendations set out in the ecology report are followed.

- 9.161 London Plan Policy G5 supports urban greening and introduces the concept of an Urban Greening Factor and Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement. DMD81 sets out that developments must provide high quality landscaping that enhances the local environment and should add to the local character, benefit biodiversity, help mitigate the impacts of climate change and reduce water run-off.
- 9.162 A tree survey was submitted with the application and provides details of the four existing trees on the site which include a Flowering Cherry, two Ash and a small Elder tree. None of the trees are subject to or worthy of protection by tree preservation order nor are they subject to protection through location in a designated conservation area.
- 9.163 The survey sets out that the cherry tree which provides some spring colours through its flowering, is weakened by extensive trunk decay which will only progress. The remaining trees are of poor to low quality and do not make a significant contribution to amenity. The proposed development would include the removal of all four of these trees. However, there is space to the west and south for new tree planting and landscaping. The report sets out that suitable tree species, such as London Plane (which can be pruned), Maple and Alder could be planted at a size to provide immediate visual impact. Trees planted less than 20cm girth for example will appear insignificant in the landscape.
- 9.164 In addition, proposed improvements to the public realm involve new tree planting: details of which are yet to be finalised. However, a condition to this effect is considered appropriate to address siting and specification.
- 9.166 As a result, although all the trees at the site will be removed as part of the development, subject to replacement tree planting of a size to contribute to amenity from the planting stage, the impact of the scheme upon the treed landscape will be low.
- 9.167 In summary, the ecological and landscaping elements of the proposal are acceptable subject to conditions. The new landscaping proposals represent a betterment as the existing site is lacking in any landscaping. In this respect the scheme complies with the relevant London Plan and Enfield policies and the guidance within the NPPF.

Contaminated Land

- 9.168 Environmental Health officers have advised that a pre-commencement condition for further investigation and remediation measures is required to safeguard the amenity of future users.

Air Quality

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

- 9.170 Environmental Health does not raise any concerns that the proposal would have a negative impact on existing air quality subject to a condition being attached requiring, construction dust and non-road mobile machinery.

Sustainable Drainage / Flooding

- 9.171 London Plan Policy SI16 requires the consideration of the effects of development on sustainable drainage. 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 run off rates as well as maximise the use of SuDS.
- 9.172 The site is located in flood zone 2. A Flood Risk Assessment (FRA) was submitted with the application. The EA were consulted and raised no objections.
- 9.173 Following discussion and the receipt of additional information on flood risk assessment and surface water drainage drainage, it is now considered appropriate to secure further details through the imposition of conditions .

Health Impact Assessment

- 9.174 This HIA has reviewed the Proposed Development at 50-56 Fore Street, Enfield to identify potential health impacts, demonstrate how health considerations have been incorporated into the proposals, and to identify opportunities for securing measures that could bring health and wellbeing enhancements in the future delivery of development. The method and scope of the HIA has been tailored to be proportionate to the scale and nature of the Proposed Development. The assessment makes use of the matrix of the HIA HUDU Tool to identify health impacts. The completed matrix also cross references other documents submitted with the planning application that are relevant to the HIA, and that contain greater detail on technical assessment and/or proposed mitigation.
- 9.174 The HIA found that development will predominantly result in beneficial health effects including in relation to housing quality and design, accessibility and active travel, crime reduction and safety, access to healthy foods, work and training, social cohesion and lifetime neighbourhoods and minimising the use of resources. Potential negative effects were identified in relation to health care service and social infrastructure, due to increased number of residents using local services and infrastructure, however these effects will be mitigated through the provision of CIL contributions.
- 9.175 Potential negative effects were also identified in relation to the comfort of resident when balancing overheating and noise levels when opening windows during warmer periods. To help future residents manage impacts of overheating, the general guidance on managing the risk of overheating (as outlined in the Energy and Sustainability Statements) should be made available to residents (e.g. as part of welcome pack).

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. S106 Contributions

- 11.1 Regulation 122(2)(a) of the 2010 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 Having regard to the content above, it is recommended that should planning permission be granted, the following obligations / contributions should be secured through a s106 legal agreement:

- Affordable Housing – 100% (110 units) London Affordable Rent;
- An early stage viability review;
- Improvements to Conservation Area public realm including £10k to War Memorial
- Local Employment and Skills Strategy - strategy to be submitted for approval prior to commencement of development;
- Highways contributions – £32,364 toward sustainable transport measures and Cycle Enfield;
- Public footway access amendments applicant to maintain and provide public access – S73 works
- Implementation of the loading bay would be at a cost of approximately £15,000 and would be completed through a S73. Contribution to Future CPZ
- Car Club
- Connection to a DEN
- Education Contribution
- Carbon neutral offset
- Architects Retention Clause
- Monitoring fee for the financial contributions.

12. Community Infrastructure Levy (CIL)

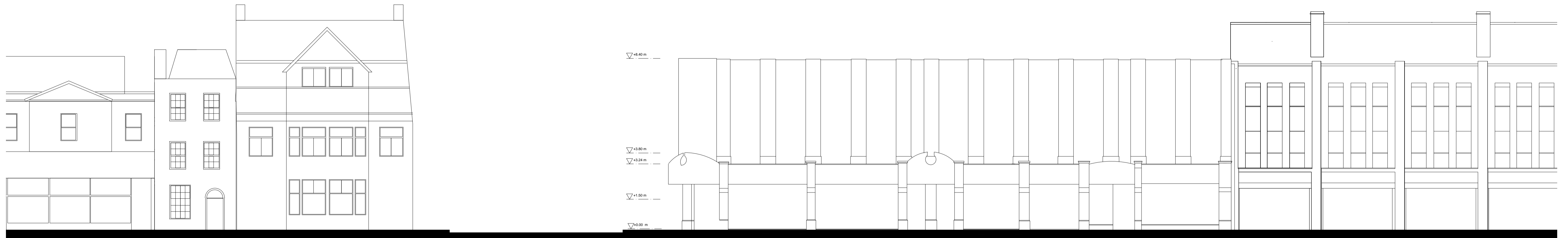
- 12.1 As of the April 2010, new legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development.
- 12.2 The new GIA proposed as part of the development would be liable to a Community Infrastructure Levy contribution for both Mayoral CIL (£60 per sqm) and Enfield CIL (£140 per sqm for residential and £60 per sqm for A1-A5 uses).

13.0 Conclusion

- 13.1 The starting point for the determination of any planning application is the development plan and the need to determine planning application in accordance with the development plan. It is clear this is a development in a sensitive location wherein the relationship to a number of heritage assets and the wider townscape needs to be carefully assessed in accordance with relevant legislation, guidance and policy.
- 13.2 Members have previously expressed concerns regarding the harm arising from the development on designated and non designated heritage assets, effect arising from the height of the development and the residential mix not providing enough family homes. This prompted the applicant to improve the number of family homes to 20% (an increase from 14 to 22 units) but there have been no changes to the height or design of the development.
- 13.3 The matter to be considered therefore is whether the improved family housing officer as a public benefit, is sufficient to outweigh the harm to the Conservation Area.
- 13.4 Designated heritage assets are listed as areas or assets of particular importance. In making this assessment of planning balance therefore, Members need to consider the advice on the weight to be given to harm to heritage assets in Paragraphs 9.81- 9.104 of this report. However, the application also has to be considered in the light of the Housing Delivery Test and the need for housing to meet the Council's strategic housing targets, triggering the tilted balance in any assessment and the presumption 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 this Framework taken as a whole" (Paragraph 11(d) of the NPPF). Furthermore, Paragraph 11(d) of the NPPF, acknowledges that planning permission should be granted unless "the application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed".
- 13.5 Having regard to the assessment in this report and the improved residential mix, it is concluded the development would cause 'less than substantial harm' to identified heritage assets.
- 13.6 Where there is 'less than substantial harm' to the significance of a designated heritage asset, this should be weighed against the public benefits of the proposal. In this case, the public benefits of the development include:
- i) 110 new residential homes
 - ii) 100% of the residential units being genuinely affordable and provided at London Affordable Rent
 - iii) replacement multi use commercial space
 - iv) enhancement of Clive Avenue to address anti-social activity
 - v) employment opportunities during construction
 - vi) investment into Fore Street

It is considered that these public benefits especially the fact that the all the residential units would be provided at London Affordable Rent, outweigh the 'less than substantial harm' identified.

- 13.7 Consequently, it is considered the application of policies in the Framework which protect areas or assets of particular importance do not provide a clear reason for refusal. As mentioned above, Limb ii. of paragraph 11(d) of the NPPF is therefore engaged, whereby 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 this Framework taken as a whole”*.
- 13.8 It is acknowledged and as is recognised throughout this report, that consideration of this proposal has involved finely balanced judgements. Compromises have been made in the consideration of the proposal in order to optimise the development potential of this highly sustainable brownfield site and thus contribute to the Boroughs challenging housing targets. It is recognised that sites such as this need to be optimised in order to contribute to housing delivery and minimise encroachment into the Borough’s Green Belt and other protected designations.
- 13.9 It is also considered that the social benefits of the proposal carry significant weight in favour of the proposed development. Further economic and social benefits include employment during construction, as well as the continued and improved use of local services and facilities.
- 13.10 It is considered that the conflicts identified with other Development Plan policies, as identified in the analysis section of this report, would not on their own or cumulatively significantly and demonstrably outweigh the benefits of the proposed development.
- 13.11 Overall therefore, it is considered the application proposes a high-quality residential development on existing underutilised, highly sustainable brownfield land. It is acknowledged that due to the quantum of homes proposed and the resultant extent of site coverage there are shortcomings to the proposal as identified in the analysis section of this report. However, it is also recognised that there is a pressing need for housing, including affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. In this context the provision of 110 homes all of which would be delivered at London Affordable Rent represents a significant contribution and weighs heavily in favour of the development despite the acknowledged deficiencies with the proposal.
- 13.12 In conclusion, and giving weight to the need for development which provide new homes, it is concluded that the development for reasons set-out within this report, to broadly accord with the adopted policy framework as well as relevant emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule, and within the Section 106 Agreement, the application is recommended for approval.



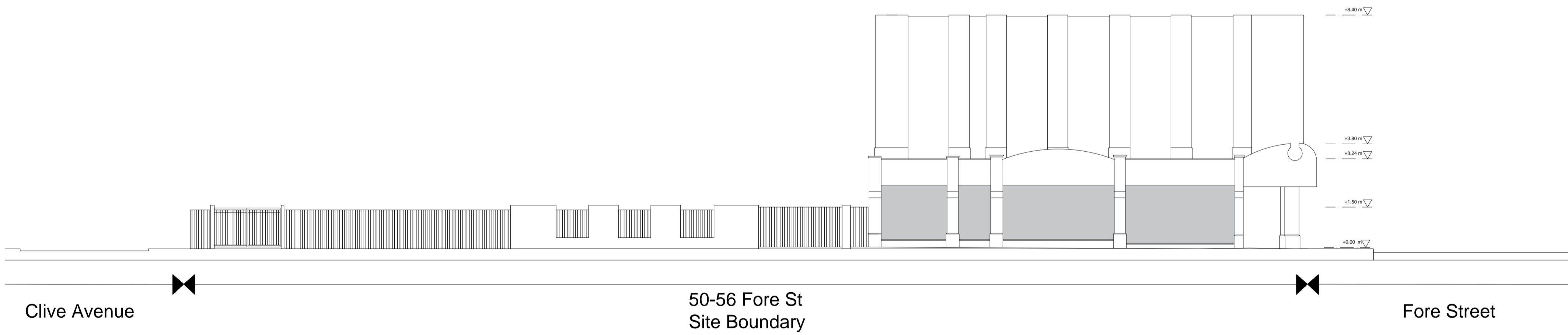
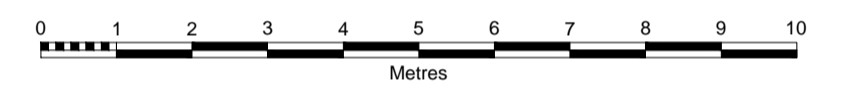
56-66 Fore Street

Claremont Street

50-56 Fore Street
Site Boundary

48-42 Fore Street

1 Existing Elevation - Fore Street
Scale 1:100

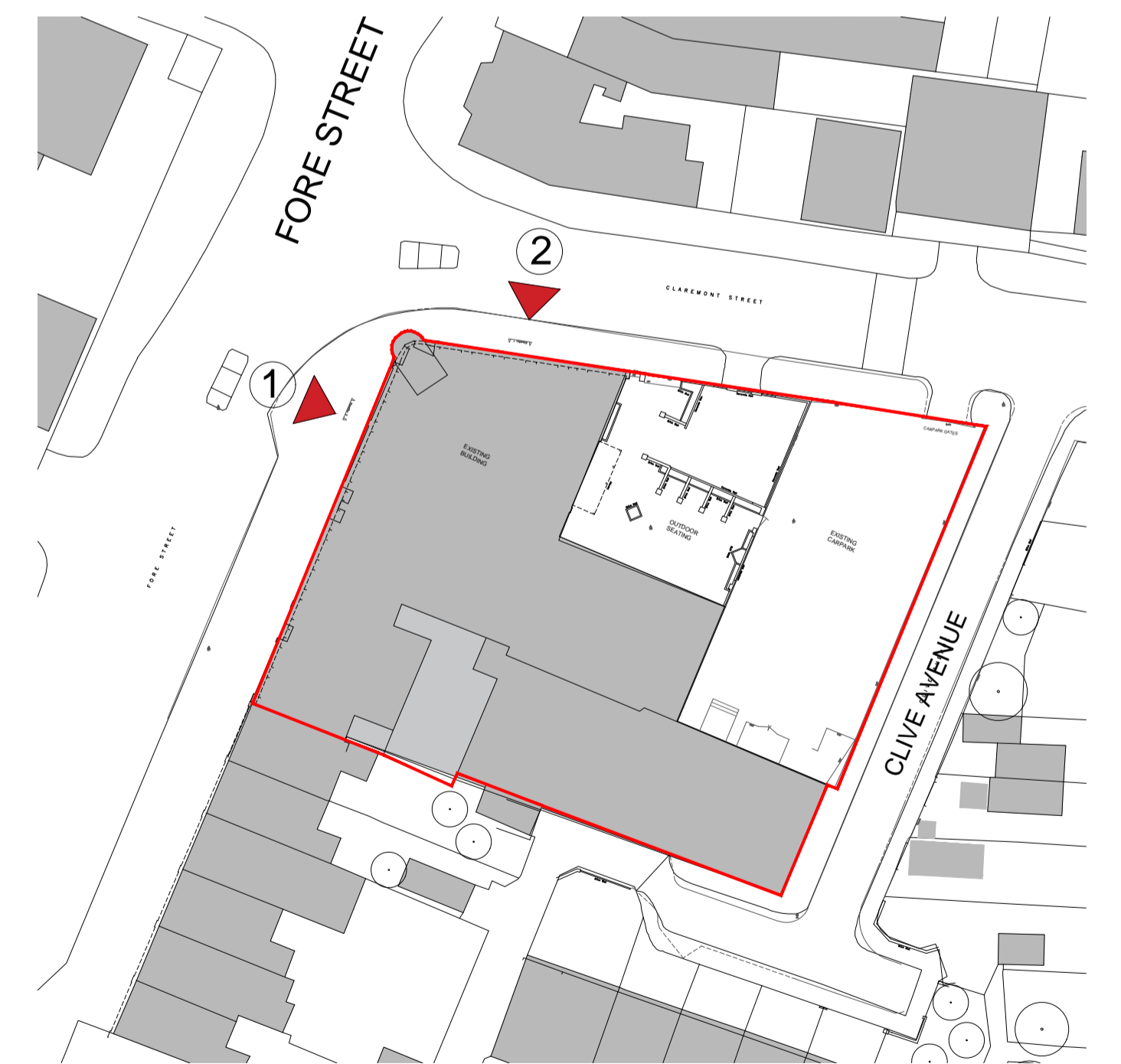
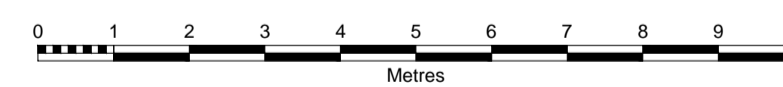


Clive Avenue

50-56 Fore St
Site Boundary

Fore Street

2 Existing Elevation - Claremont Street
Scale 1:100



Site Location
1:500

| Rev | Date | Drawn | Description |
|-----|----------|-------|----------------------|
| P01 | 29.05.20 | AMR | Planning Application |

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Legend
— Site boundary

Existing Elevations
drawing title
Social Housing Plus Fore Street Limited
Fore Street, Enfield
client / project

FSE 102
drawing number

1:100 1:200
scale @A1 @A3

SHP-FSE
project number

P01
revision

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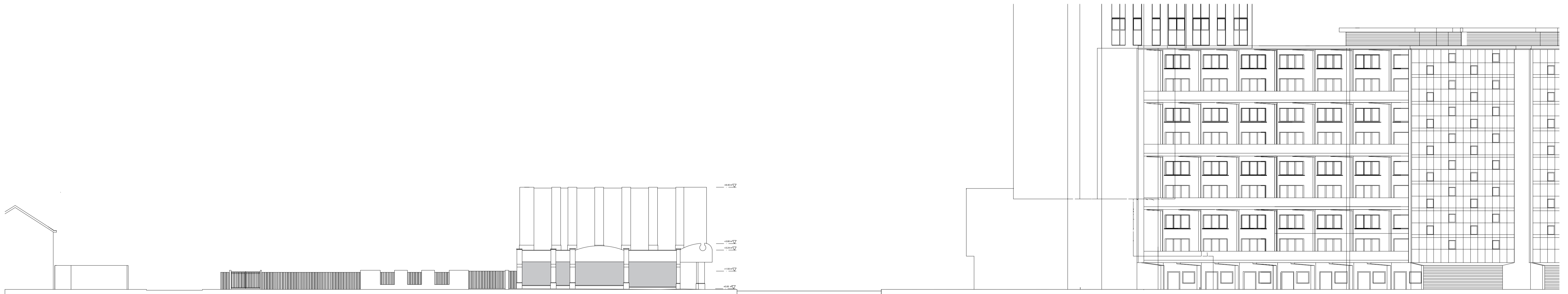
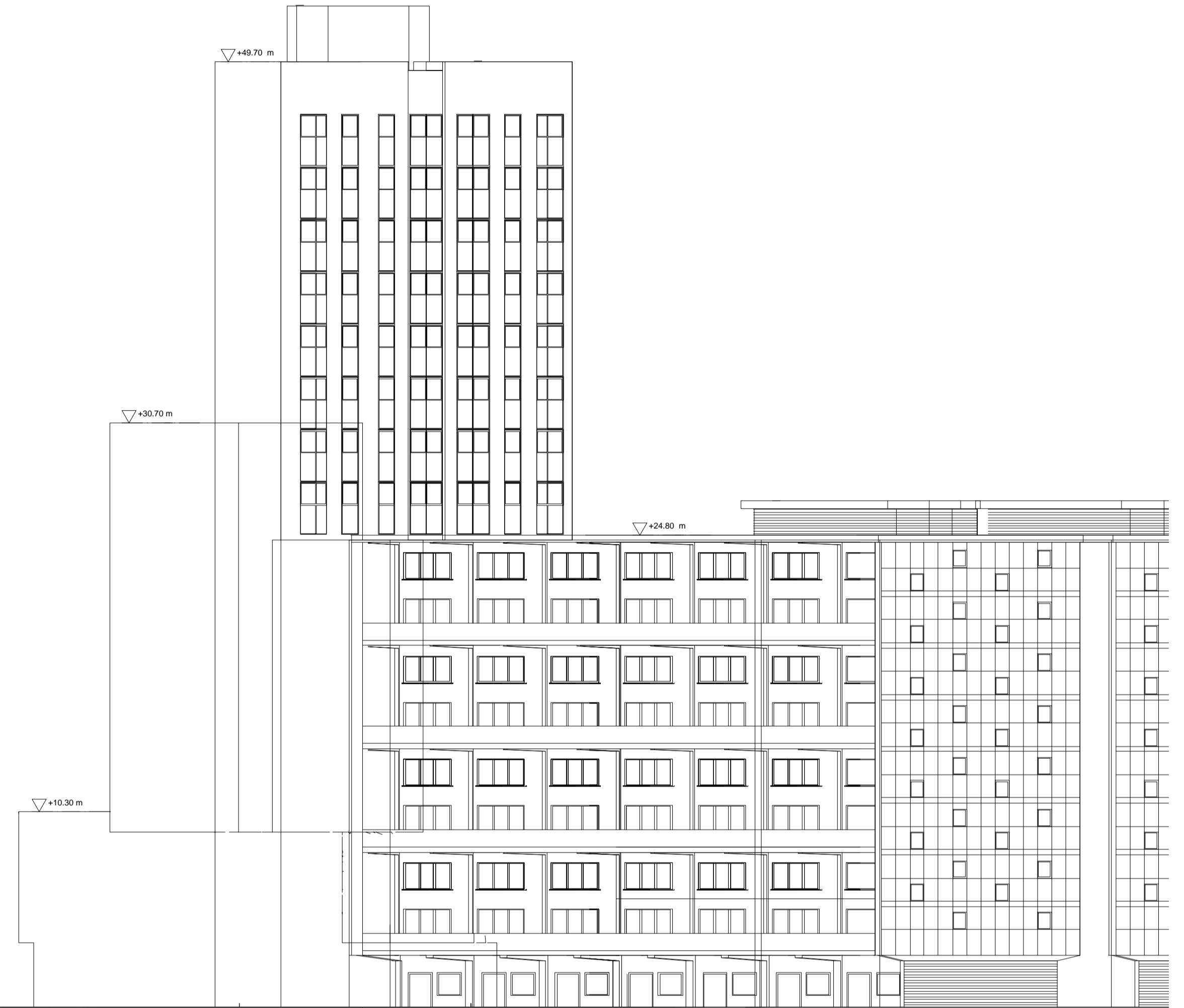




Site Location Plan
1:1250



1 Proposed Elevation - Claremont St & Grove St
Scale 1:200



2 Existing Elevation - Claremont St & Grove St
Scale 1:200

Clive Avenue 50-56 Fore St Site Boundary Fore Street Regan House Isis House

| Rev | Date | Drawn | Description |
|-----|----------|-------|----------------------|
| P01 | 29.05.20 | AMR | Planning Application |

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Legend

Note:
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Existing & Proposed Elevations Claremont FSE 105
drawing title drawing number

Social Capital Partners
Fore Street, Enfield
client / project

1:200 scale @ A1
1:400 scale @ A3

SHP-FSE project number

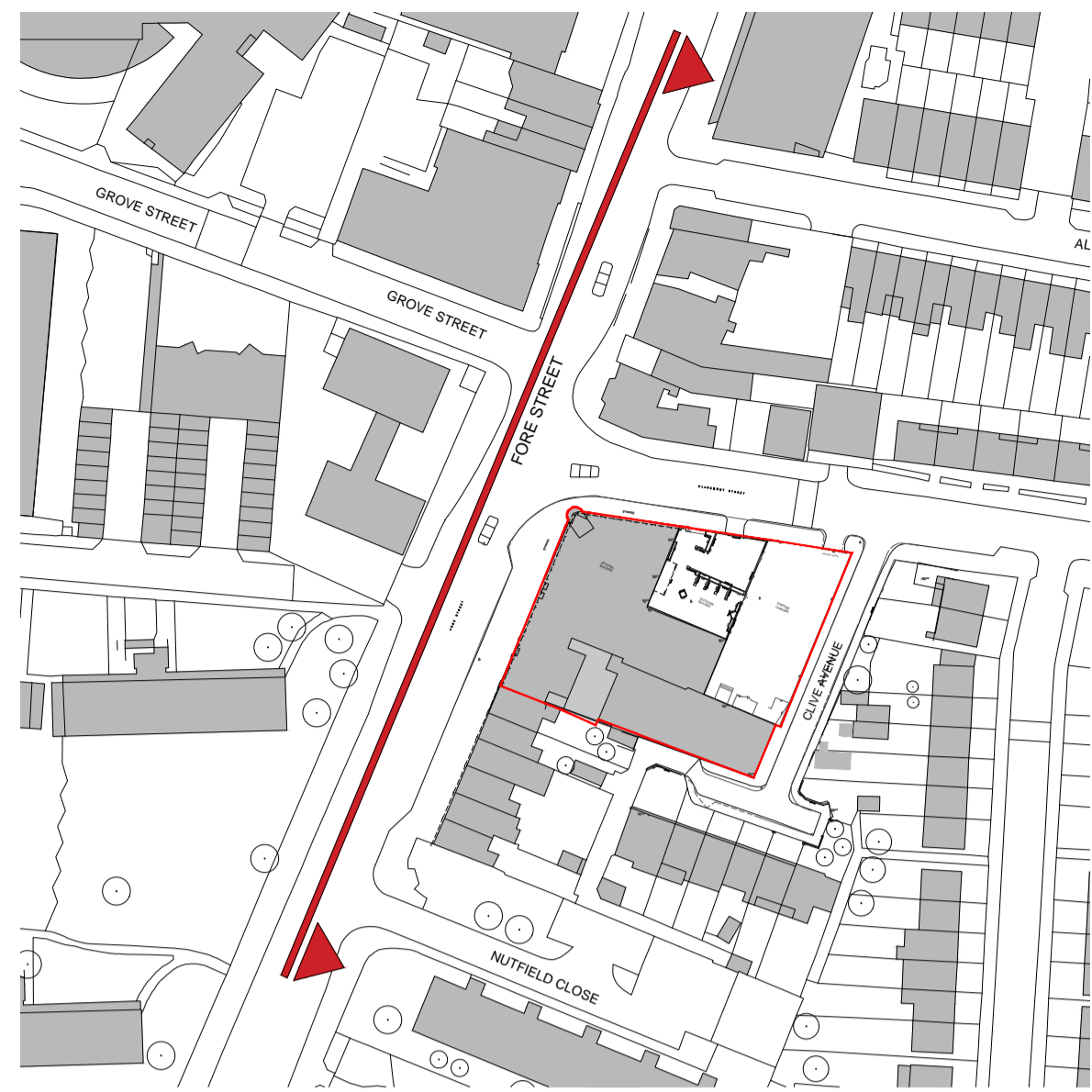
P01 revision

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Site Location Plan
1:1250



1 Proposed Elevation - Fore Street
Scale 1:200



2 Existing Elevation - Fore Street
Scale 1:200



| Rev | Date | Drawn | Description |
|-----|----------|-------|----------------------|
| P01 | 29.05.20 | AMR | Planning Application |

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Legend



Existing & Proposed Fore St Elevations
drawing title
Social Housing Plus Fore Street Limited
Fore Street, Enfield
client / project

FSE 104
drawing number

1:200 scale @ A1
1:400 scale @ A3

SHP-FSE
project number

P01
revision

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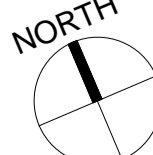


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| P01 | 28.05.20 | AMR | Planning Application |

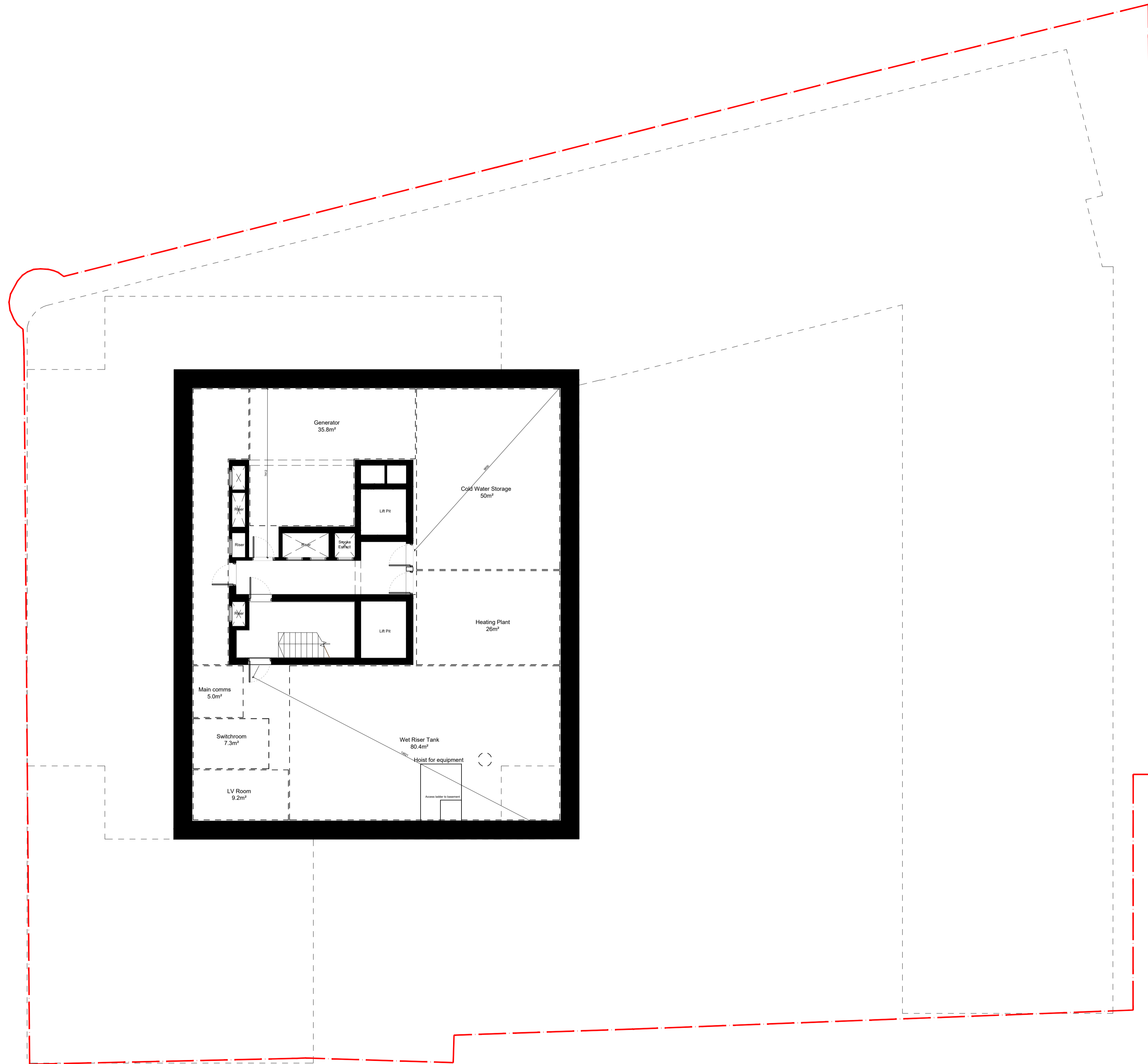
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- Legend
- Site boundary
 - Roof Level - No General Access
 - Private Outdoor Amenity
- Note:
 Highways works shown indicatively only



| | | |
|---|---|--|
| <p>Proposed 03-16 Floor Plans</p> <p>Social Housing Plus Fore Street Limited Fore Street, Enfield</p> <p>FOR PLANNING</p> | <p>HTA-AP03</p> <p>drawing title drawing number</p> <p>1:100 1:200 scale @ A1 @ A3</p> <p>HTA Design LLP www.hta.co.uk London Edinburgh Manchester Bristol</p> | <p>P01</p> <p>revision</p> <p>SHP-FSE</p> <p>project number</p> <p>RSH</p> <p>originated by</p> |
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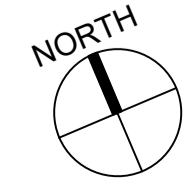
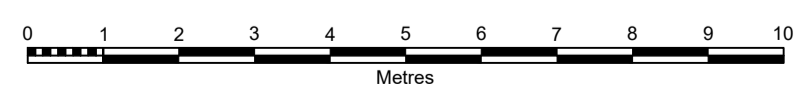


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| P01 | 03.04.23 | ZAB | Draft Issue |

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- Legend**
- Site boundary
 - Roof Level - No General Access
 - Private Outdoor Amenity

Note:
 Highways works shown indicatively only



Proposed Basement Floor
 drawing title
 Social Housing Plus Fore Street Limited
 Fore Street, Enfield
 client / project

HTA-AP00
 drawing number

1:100 1:200
 scale @ A1 @ A3

SHP-FSE
 project number

P01
 revision

RSH
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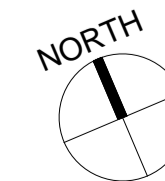
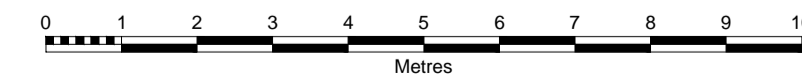
Rev Date Drawn Description
 P01 23.05.20 AMR Planning Application

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Legend
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Note:
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Proposed First Floor Plan
 drawing title
 Social Housing Plus Fore Street Limited
 client / project
 Fore Street, Enfield

HTA-AP01
 drawing number

1:100 1:200
 scale @ A1 @ A3

SHP-FSE
 project number

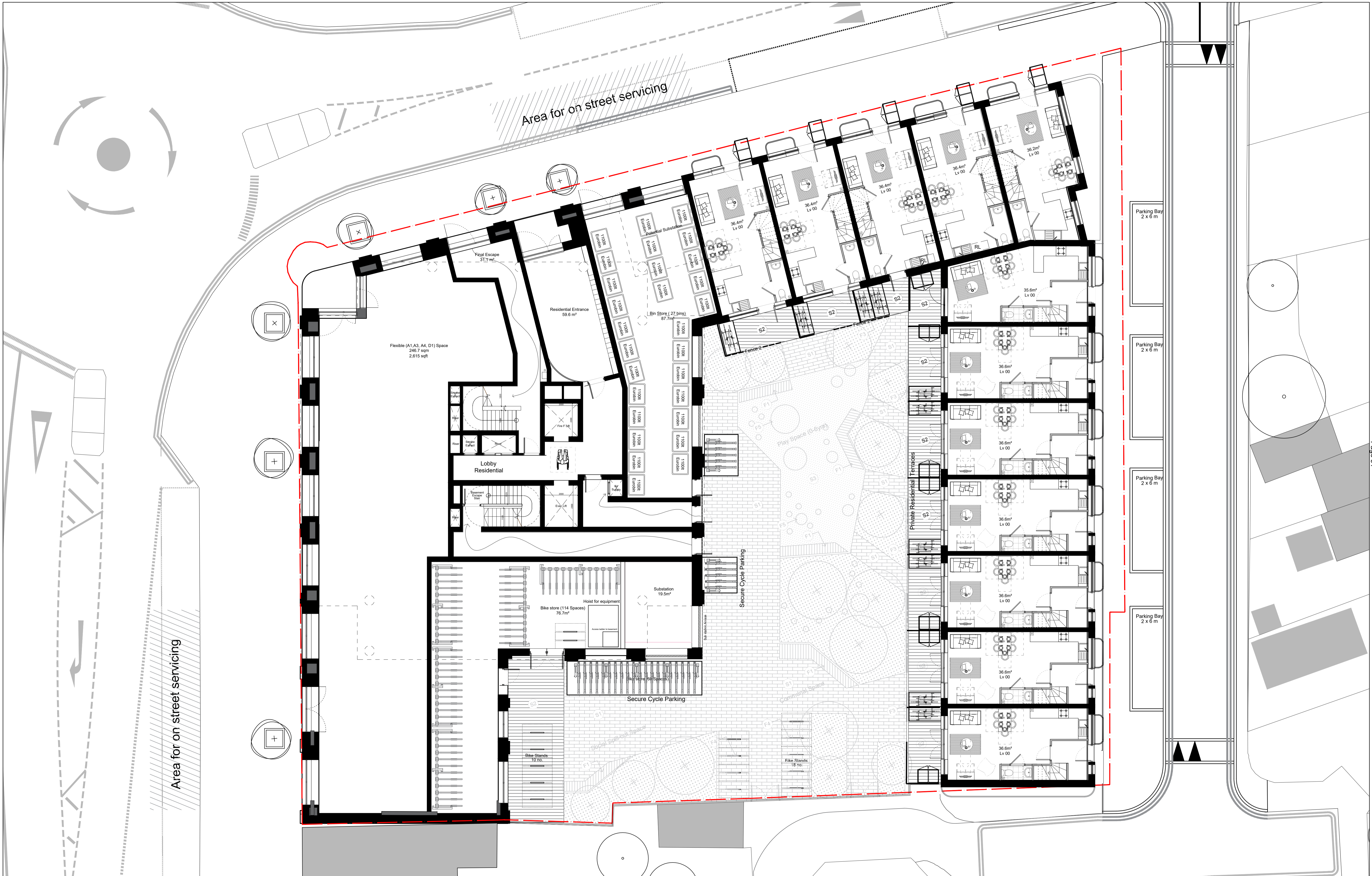
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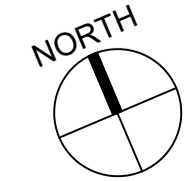
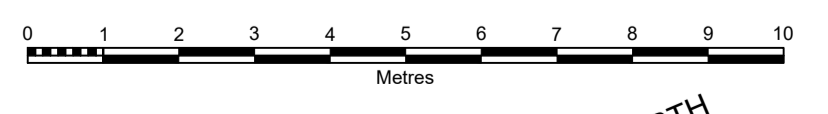
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Legend

- Site boundary
- Roof Level - No General Access
- Private Outdoor Amenity

Note:
 Highways works shown indicatively only



Proposed Ground Floor Plan HTA-AP01
 drawing title drawing number

Social Housing Plus Fore Street Limited
 Fore Street, Enfield
 client / project

1:100 1:200
 scale @ A1 @ A3

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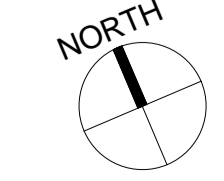
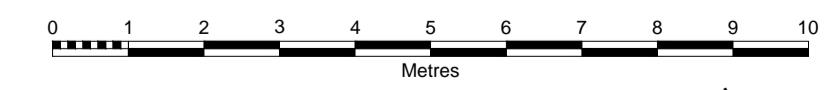
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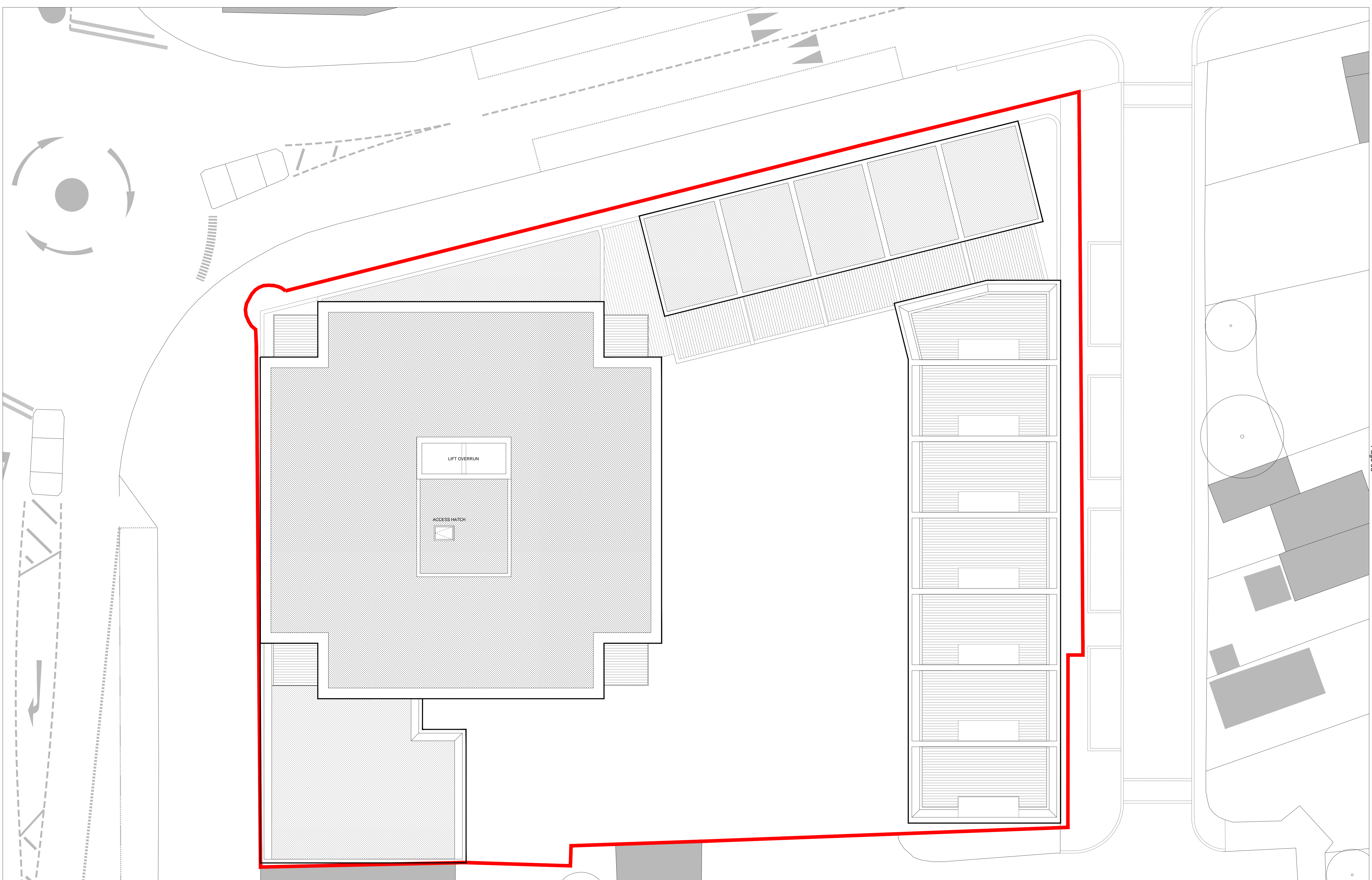
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| P01 | 29.05.20 | AMR | Planning Application |

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| Proposed Mezzanine Plan | | HTA-AP00-M | P01 |
| Social Housing Plus Fore Street Limited | | drawing number | revision |
| Fore Street, Enfield | | 1:100 @ A1 | 1:200 @ A3 |
| client / project | | SHP-FSE | RSH |
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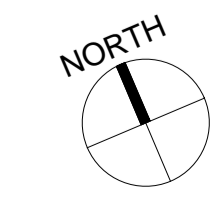
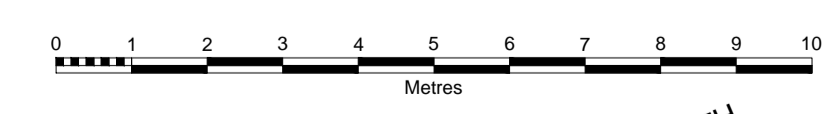
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- Legend
- Site boundary
 - Roof Level - No General Access
 - Outdoor Private Amenity

Note:
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Proposed Roof Plan
 drawing title
 Social Housing Plus Fore Street Limited
 Fore Street, Enfield
 client / project

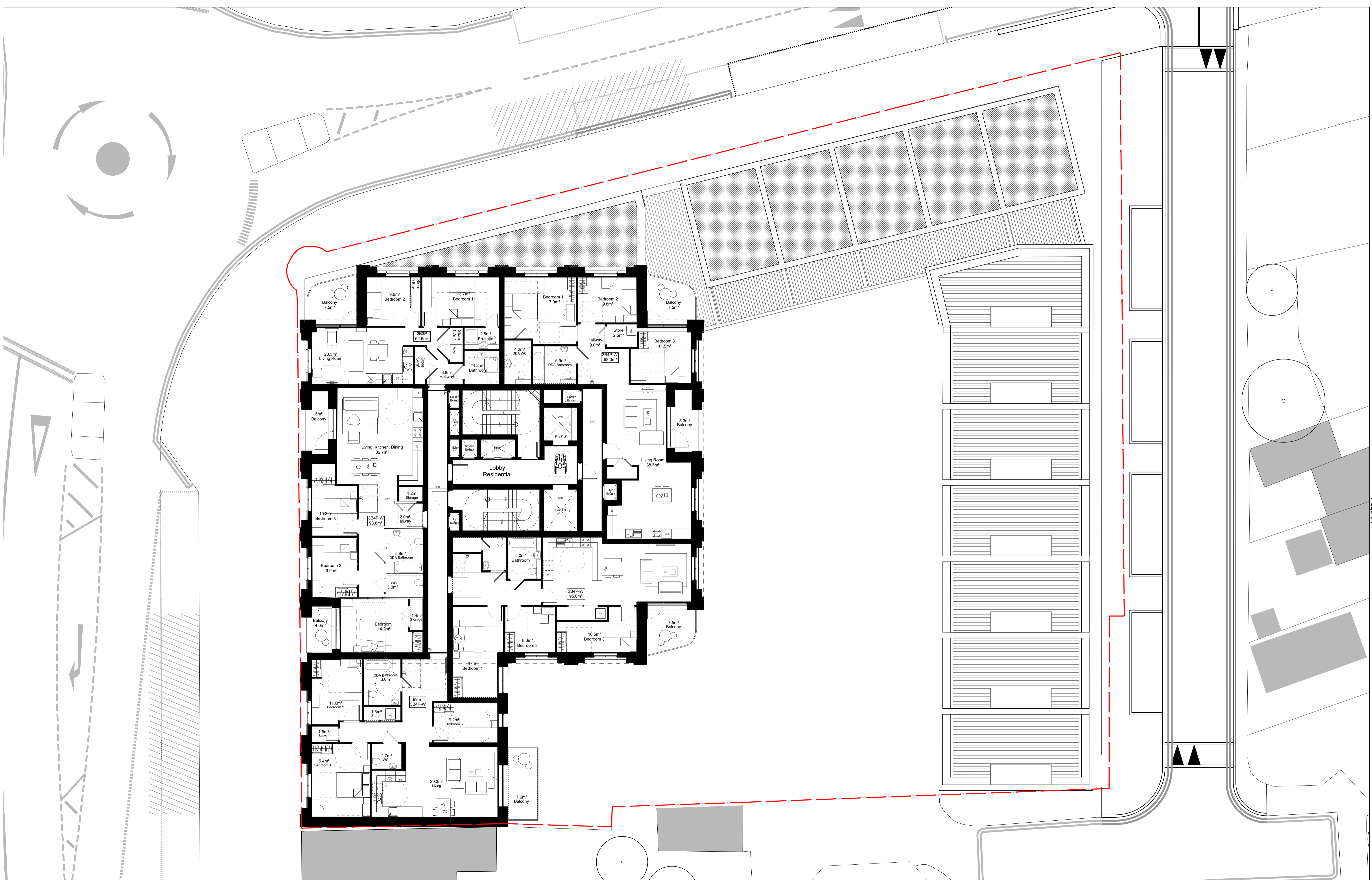
HTA-AP04
 drawing number
 1:100 @ A1
 1:200 @ A1

P01
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 project number
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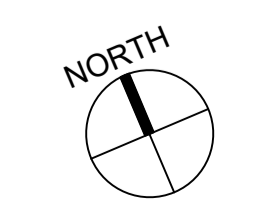
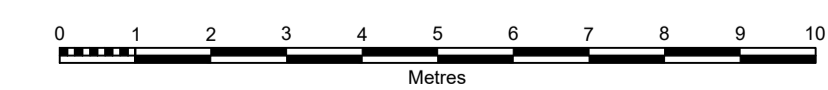


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| P01 | 03.04.23 | ZAB | Draft Issue |

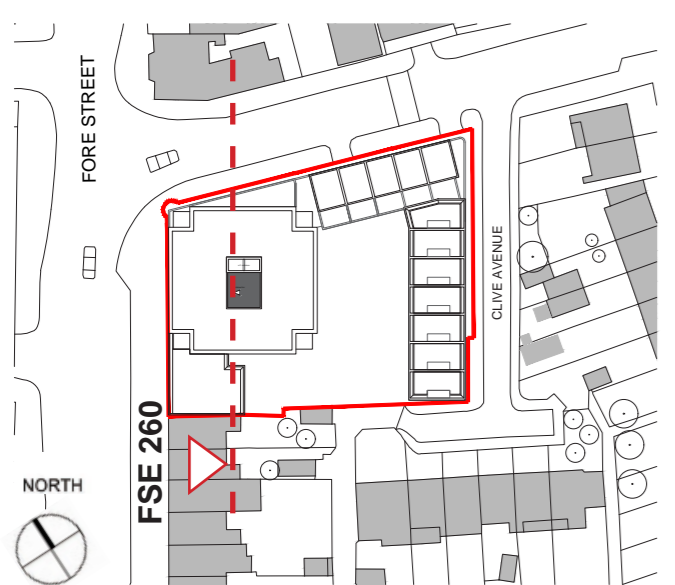
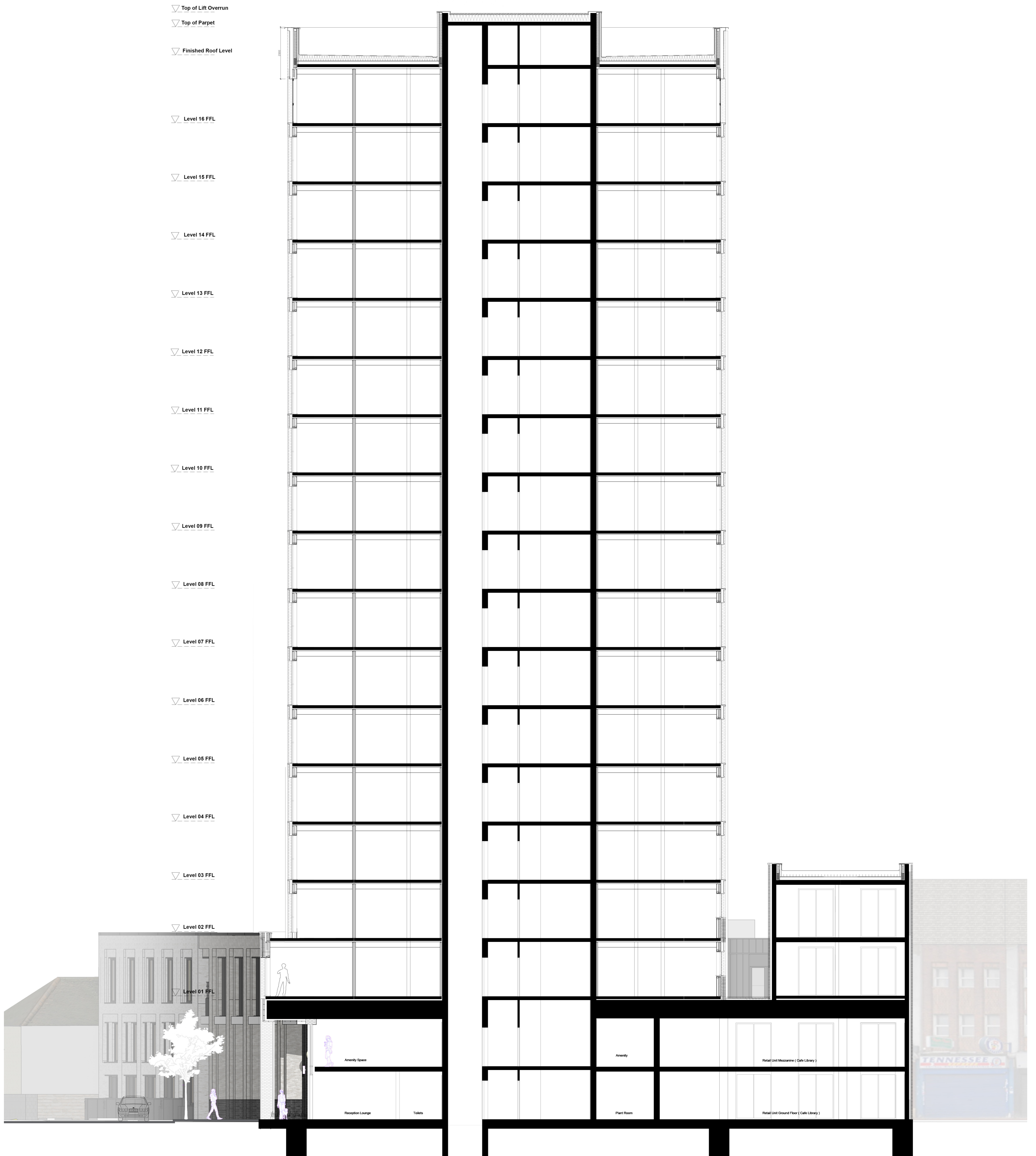
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- Legend
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 - Private Outdoor Amenity
- Note:
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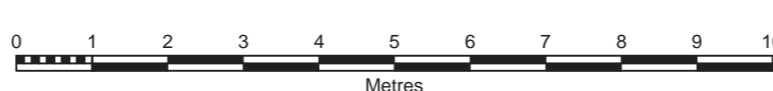


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| <p>Proposed Second Floor Plan HTA-AP02</p> <p>drawing title</p> <p>Social Housing Plus Fore Street Limited</p> <p>Fore Street, Enfield</p> <p>client / project</p> <p>HTA Design LLP</p> <p>www.hta.co.uk</p> <p>London Edinburgh Manchester Bristol</p> | <p>HTA-AP02</p> <p>drawing number</p> <p>1:100</p> <p>scale @ A1</p> <p>1:200</p> <p>@ A3</p> <p>SHP-FSE</p> <p>project number</p> | <p>P01</p> <p>revision</p> <p>HTA</p> <p>originated by</p> <p>hta</p> |
| <p>DRAFT</p> <p>status</p> | | |



- Legend**
- Brickwork - Off-white brick, light coloured mortar, running bond (spec TBC)
 - Glazed brick, stacked bond tosetback wall and colonnade soffit, dark bronze colour (spec TBC)
 - Window frames & curtain wall, Granite Grey (RAL colour TBC)
 - Aluminium pressed metal spandrel panels, Granite Grey (spec TBC)
 - Reconstituted stone string course, off-white colour (spec TBC)
 - Railings, copings and reveals, PPC Aluminium (RAL colour TBC)
 - Standing seam mansard roof, anthracite colour (spec TBC)

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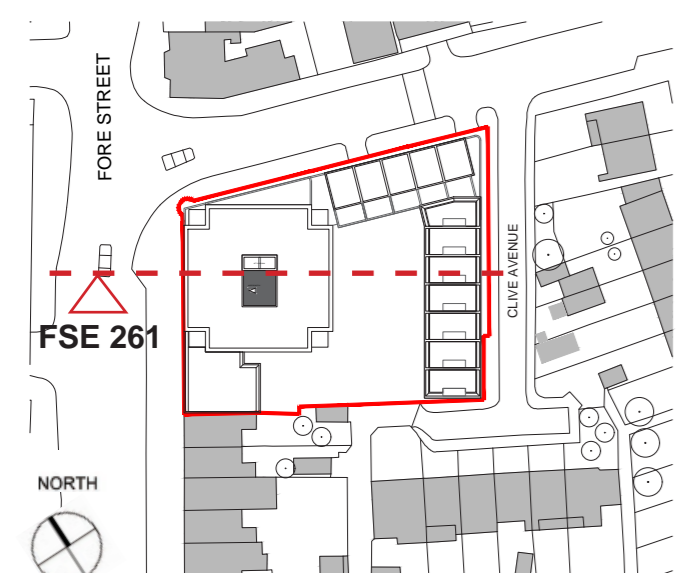
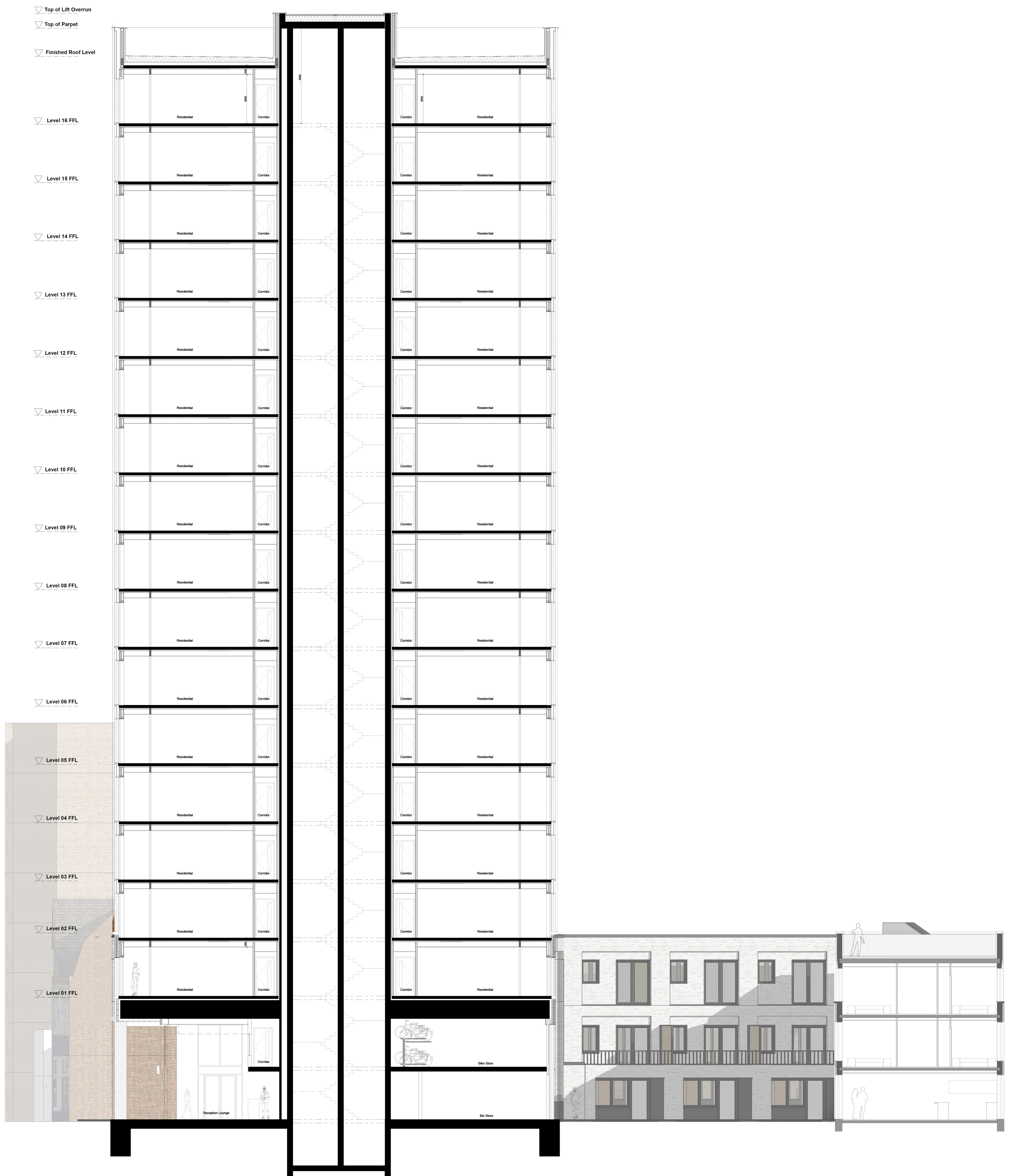
Proposed Section AA - East-West FSE 260
 drawing title drawing number
 Social Housing Plus Fore Street Limited
 client project number
 Scale
 1:100 @ A1 1:200 @ A3

P01
 revision
 ZHL
 originated by

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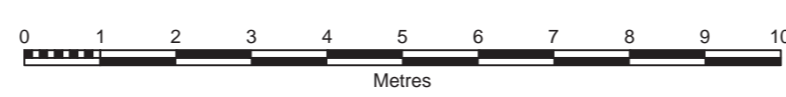
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- Legend**
- Brickwork - Off-white brick, light coloured mortar, running bond (spec TBC)
 - Glazed brick, stacked bond tosetback wall and colonnade soffit, dark bronze colour (spec TBC)
 - Window frames & curtain wall, Granite Grey (RAL colour TBC)
 - Aluminium pressed metal spandrel panels, Granite Grey (spec TBC)
 - Reconstituted stone string course, off-white colour (spec TBC)
 - Railings, copings and reveals, PPC Aluminium (RAL colour TBC)
 - Standing seam mansard roof, anthracite colour (spec TBC)

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Proposed Section BB - North-South **FSE 261**
 drawing number
 Social Housing Plus Fore Street Limited
 client / project
 Scale
 1:100 @ A1 1:200 @ A3

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SHP-FSE
 project number
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Legend
 — Site boundary
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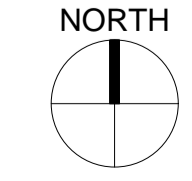
Proposed Site Plan
 drawing title
 Social Housing Plus Fore Street Limited
 Fore Street, Enfield
 client / project

FSE 103
 drawing number

P01
 revision

1:200 1:400
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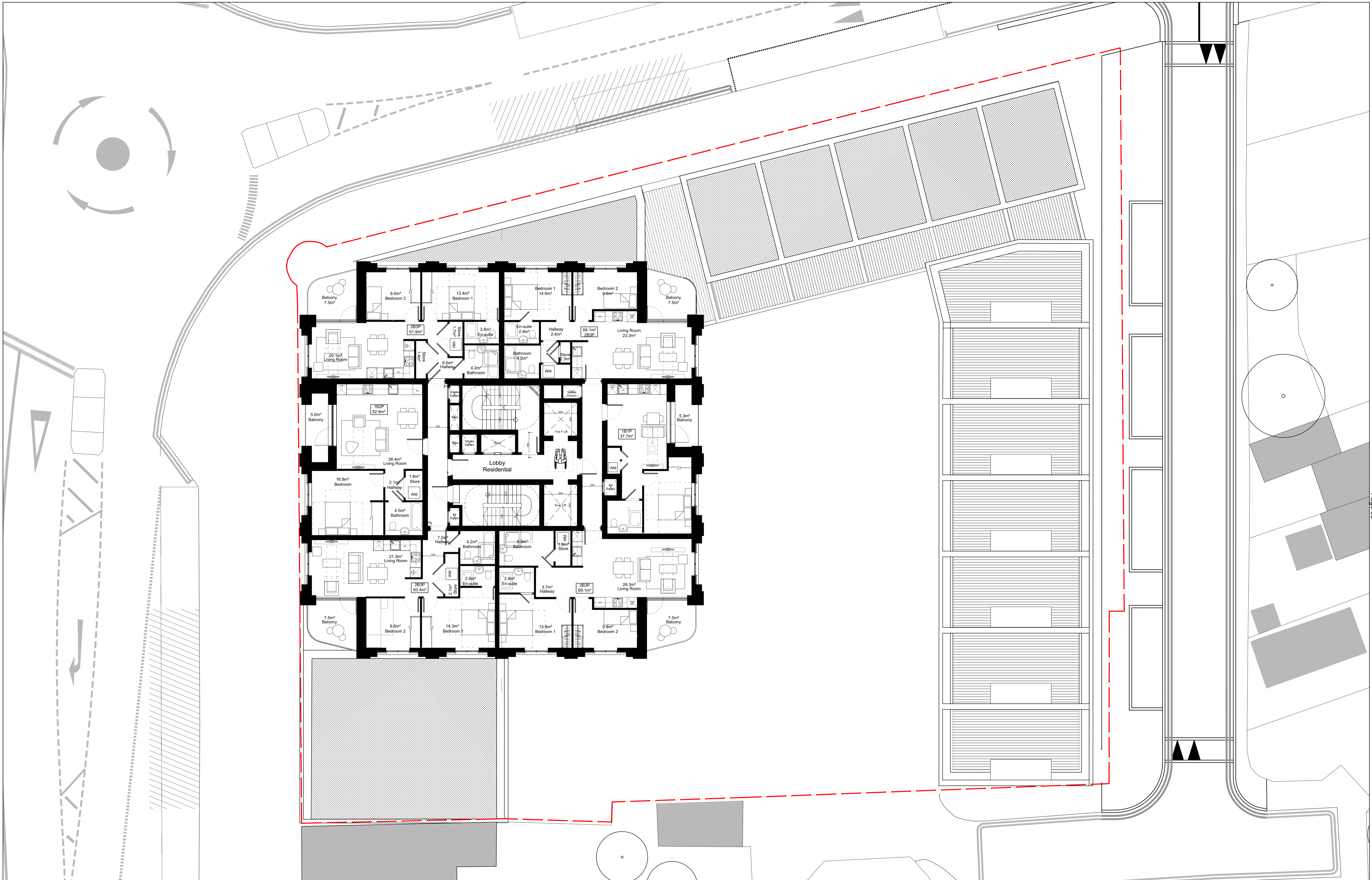
SHP-FSE AMR
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Rev Date Drawn Description
 P01 03.04.23 ZAB Draft issue

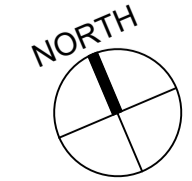
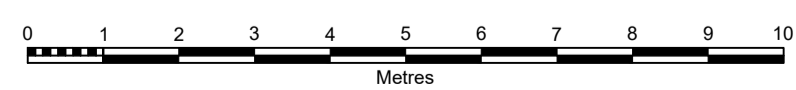
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Legend


- Site boundary
- Roof Level - No General Access
- Private Outdoor Amenity

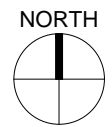
Note:
 Highways works shown indicatively only



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| <p>Proposed Third Floor Plan</p> <p>drawing title Social Housing Plus Fore Street Limited Fore Street, Enfield client / project</p> <p>DRAFT <small>status</small></p> | <p>HTA-AP05</p> <p>drawing number 1:100 scale @ A1</p> <p>1:200 @ A3</p> <p>HTA Design LLP www.hta.co.uk London Edinburgh Manchester Bristol</p> | <p>P01</p> <p>revision SHP-FSE project number RSH originated by</p> <p>hta</p> |
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Legend

 Site boundary



P01 29.05.20 AMR Planning Application
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Social Housing Plus Fore Street Limited
 50-56 Fore Street
 drawing title
Site Location Plan

drawing number
FSE 100
 scale W A3
 1:1250

revision
P01

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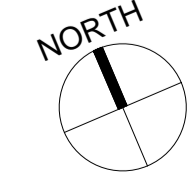
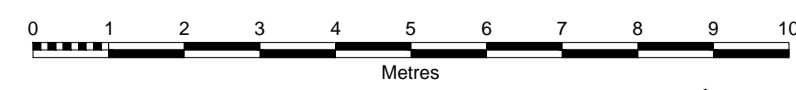


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| P01 | 28.05.20 | AMR | Planning Application |

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- Legend
- Site boundary
 - Roof Level - No General Access
 - Private Outdoor Amenity

Note:
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Typical Upper Floor
 drawing title
 Social Housing Plus Fore Street Limited
 Fore Street, Enfield
 client / project

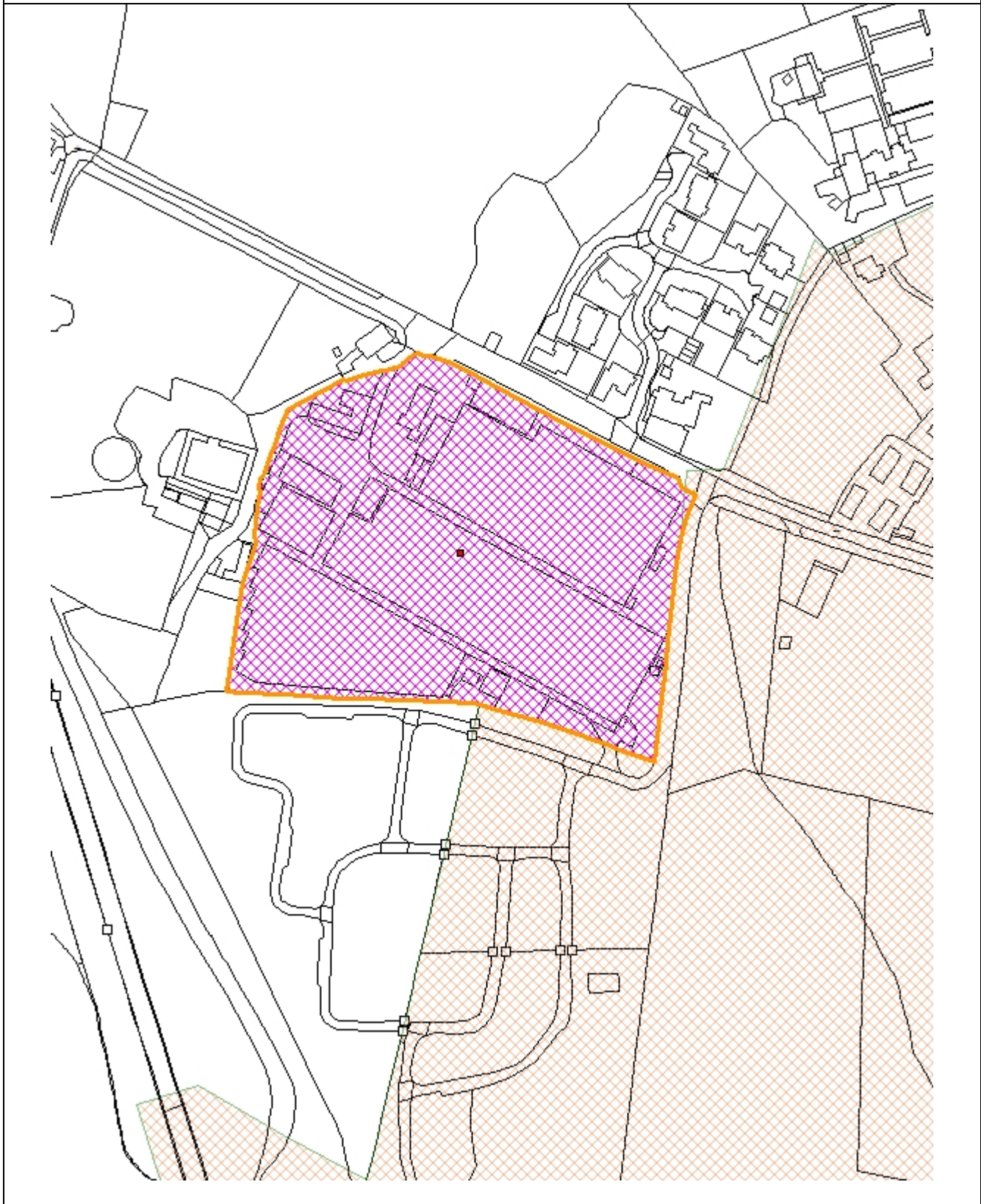
HTA-AP03
 drawing number
P01
 revision
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 SHP-FSE RSH
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| | | |
|---|--|------------------------------|
| LONDON BOROUGH OF ENFIELD | | |
| PLANNING COMMITTEE | Date: 5 September 2023 | |
| Report of Director of Planning & Growth - Brett Leahy | Contact Officers: Lap Pan Chong Sharon Davidson Andy Higham | Category Major |
| Ward Whitewebbs | Councillor Request No | |
| LOCATION: Anglo Aquarium Plant, 30 And 32 Strayfield Road, Enfield, EN2 9JE | | |
| APPLICATION NUMBER: 22/01542/OUT | | |
| PROPOSAL: Outline application with all matters reserved except for access for the demolition of existing buildings, structures and removal of open storage, and construction of up to 58 affordable dwellings, 5 live-work units (Use Class Sui Generis) and refurbishment of existing office building to provide flexible, serviced office space, along with associated landscaping and access. | | |
| Applicant Name & Address: Mrs Emma Hardy Lansdown and Anglo Aquatic Plant Company Limited and David J 4 Queen Street Bath BA1 1HE | Agent Name & Address: Mrs Emma Hardy Lansdown and Anglo Aquatic Plant Company Limited and David J 4 Queen Street Bath BA1 1HE | |
| RECOMMENDATION: 1) That subject to referral of the application to the Greater London Authority (Stage 2) and the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Planning be authorised to GRANT planning permission subject to conditions. 2) That the Head of Planning 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: 22/01542/OUT LOCATION: Anglo Aquarium Plant, 30 And 32 Strayfield Road, Enfield, EN2 9JE



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Scale 1:1250

North



1. Note for Members

- 1.1 This planning application is categorised as a 'major' planning application and a departure from DMD Policy 82. In accordance with the scheme of delegation it is reported to Planning Committee for determination

2. Executive Summary

- 2.1. This outline application seeks planning permission (including access) for the demolition of existing buildings and construction of up to 58 affordable dwellings, 5 live-work units (Use Class Sui Generis) and refurbishment of existing office building to provide flexible, serviced office space within the designated Green Belt and the setting of the Clay Hill Conservation Area. All the other matters are reserved.
- 2.2. Whilst the proposed development is inappropriate development within the Green Belt and would result in harm to the Green Belt, 'Very special circumstances' do exist where the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations.
- 2.3. This 100% affordable homes scheme would deliver 58 energy-efficient affordable homes including 50% social rented homes and 50% family homes, which would contribute to the affordable family housing delivery in the borough especially given the substantial shortfall in 5 years housing land supply (3.8 years), under delivery of housing supply in the last three years (meeting 73% of the housing targets), and the long term under-delivery of affordable homes.
- 2.4. The other public benefits of the scheme can be summarised as follow:
- Provision of at least 764 sqm community allotments with necessary food growing infrastructure for both the future occupiers of the development and residents in the local area.
 - Substantial landscape and biodiversity enhancements resulting in an Urban Greening Factor of 0.4 and Biodiversity Net Gain of 87.86% (area based) and 828.67% (linear based)
 - Financial contribution towards walking and cycling infrastructure in the locality
 - An improvement to on-site sustainable urban drainage succeeding greenfield run-off rate
 - Delivery of modern office spaces and creating estimated additional 13 full-time equivalent operational jobs
- 2.5. The proposed scheme would upgrade the existing infrastructure in the locality to mitigate the impacts from the development through financial contributions towards education and health facilities and the delivery of a safer pedestrian route on Strayfield Road by the Applicant.
- 2.6. Subject to the recommended conditions and obligations, the proposed development would preserve the setting of the Clay Hill Conservation Area, provide safe and well-designed accommodation to the future occupiers and result in no unreasonable impacts on the residential amenities of the neighbouring properties. These aspects would be assessed in more detail at reserved matters stage.
- 2.7. The proposed development would comply with paragraph 148 of the NPPF 2021 and broadly accord with the Development Plan (Adopted London Plan 2021, Core Strategy and Development Management Policies) policies.

3. Recommendation

3.1. That subject to the referral of the application to the Greater London Authority (Stage 2) and the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Planning be authorised to GRANT planning permission subject to conditions

3.2. That delegated authority be granted to the Head of Planning 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. Reserved matters
4. Phasing plan
5. Control parameters (Maximum two storey height, maximum ridge height, maximum footprint and maximum volume)
6. Final Landscape Visual Impact Assessment
7. Accessible homes provision
8. Opening hours of the offices
9. Details of Work-live unit
10. Detailed drawings and materials details
11. Details of digital connectivity
12. Fire Statement addendum
13. Landscaping details including playspace, allotments and green roofs
14. Biodiversity Net Gain addendum
15. Bat or bird boxes details
16. External Lighting details
17. Security by Design certification
18. Tree Method Statement and Tree Retention Plan
19. Tree / shrub Clearance – Nesting Birds
20. Great Crested Newt precautionary measure
21. Bicycle parking details
22. Parking details including disabled parking and electric charging points
23. Delivery and Servicing Plan
24. Construction and Logistic Management Plan
25. Final Sustainable Drainage Strategy
26. Sustainable Drainage Verification Report
27. Final Energy Statement
28. Low Carbon Technology details
29. Overheating assessment
30. Final Whole Life Carbon Assessment and post construction monitoring
31. Final Circular Economy Statement, Excess Materials Exchange and post construction monitoring
32. BREEAM assessment (design stage and post-construction)
33. Compliance to water efficiency measures
34. No piling
35. Land contamination remediation
36. Written Scheme of Investigation
37. Compliance to Air Quality Neutrality measures
38. Compliance to non-road mobile machinery

39. Restriction of PD rights to minimise the impacts on openness

4. Site & Surroundings

- 4.1 The site is on the southern side of Strayfield Road, which runs west from Theobalds Park Road. The site is circa 2.7 hectares and is currently owned and operated by the Anglo Aquatic Company. There are three glasshouses across the majority of the site. In the western part of the site, there is an office building as well as buildings for storage, packaging and distribution. Between the buildings is hardstanding with small areas of soft landscaping and water features around the office building. The site is mainly flat. Around the site there are some trees and areas of hedging.
- 4.2 To the south is Strayfield Road Cemetery. To the east of the site is the access road into Strayfield Road Cemetery and beyond this is the northern end of Hilly Fields Park woodland and beyond this is North Enfield Cricket Club. To the west is a commercial operation, which is understood to be a stud farm, with a railway line beyond. To the north, there are residential properties on the northern side of Strayfield Road
- 4.3 The site is within the Green Belt. The Hilly Fields Park woodland to the east is part of a Site of Metropolitan Importance for Nature Conservation. To the west, the railway corridor is designated as a Site of Borough Importance for Nature Conservation.
- 4.4 Immediately beyond the site's eastern, southern and part of the western boundary corresponds with an Area of Special Character which also extends to include the buildings around Strayfield Road and Theobald's Park Road. This land is also identified as Local Open Space.
- 4.5 To the east of the site, Hilly Fields Park is identified as a non-designated heritage asset within LBEs Local Heritage List 2018. The Site adjoins Clay Hill Conservation Area (designated heritage asset). To the north and east of the site are residential properties with the Grade II St John's Church to the east (designated heritage asset). The site is within Whitewebbs Hill, Bulls Cross and Forty Hill Area of Archaeological Importance.
- 4.6 The Site also adjoins Area of Special Character to the east.
- 4.7 The Public Transport Accessibility Level (PTAL) is 0, which reflects poor accessibility. The nearby services and facilities have been outlined in Table 1 below.

Table 1 : Distance to local amenities

| Amenity | Physical distance (km) | Estimated walk / cycle distance (mins) |
|---|------------------------|--|
| Bus stops on Theobald's Park Road and Clay Hill | 0.4 km to the east | 5 minutes' walk |
| Crews Hill Station | 1.2 km to the north | 8-minute cycle or 28 minutes' walk |
| Gordon Hill Station | 1.2 km to the south | 8-minute cycle or 27 minutes' walk |
| Headstart Crews Hill Day Nursery and Pre-school on Theobald's Park Road | 0.2 km to the north | 9 minutes' walk |
| St John's Church of England Primary School on Theobald's Park Road | 0.2 km to the north | 7 minutes' walk |

| | | |
|---|-------------------------------------|------------------------------------|
| One Degree Academy (Primary School) in Chase Farm | 2km to the south-west of the Site | 8 minute cycle or 26 minutes' walk |
| Wren Academy (Secondary School) in Chase Farm | 2km to the south-west of the Site | 8 minute cycle or 26 minutes' walk |
| Some garden centres with cafes and shops on Cattlegate Road | 1km to north | 6-minute cycle or 22 minutes' walk |
| Lavender Hill Local Centre with a wide variety of facilities and services | 2km to the south-east of the Site | 7-minute cycle or 27 minutes' walk |
| Chase Farm Hospital | 2km to the south-west of the Site | 8 minute cycle or 26 minutes' walk |
| General practices on Tenniswood Road | 2.6km to the south-east of the Site | 9-minute cycle or 30 minutes' walk |

4.8 The site is located in Environment Agency Flood Zone 1 (low risk of flooding).

5. Proposal

5.1 This outline planning application is for access only with all other matters reserved.

5.2 The existing glasshouses and storage structures on site would be demolished, with the proposal to construct up to 58 residential dwellings. This would include 18 x two-bedroom units and 40 x three-bedroom units. All are proposed to be affordable, with a proposed tenure mix of 50:50 between social rent and intermediate housing.

5.3 There would also be five live-work units (Use Class Sui Generis) with employment floorspace on the ground floor and residential floorspace above.

5.4 The existing office building would be refurbished to provide flexible, serviced office space.

5.5 There would be ancillary landscaping, playspace, and parking.

5.6 The existing secondary access to the application site from Strayfield Road to the east of the main access will be altered to serve the proposed development. The existing main access shared with the adjoining sites would remain in place but would no longer serve the site.

5.7 The Applicant has provided further details on the proposal, although this must be interpreted in the context of scale, layout, appearance and landscaping being reserved matters. Hence, the plans provided are indicative.

5.8 The indicative layout shows an internal circular road within the site which would be lined with trees. The employment uses would be in the north-west of the site. The housing would occupy the remainder of the site. There would be open space, community allotments, greenhouses, cycle and pedestrian links. There would be an attenuation pond in the south of the site and permeable paving elsewhere. There would be new tree and hedge planting (See Biodiversity, Trees and Landscaping section).

6. Consultation

Pre-application Consultation

Public engagement

- 6.1 The Applicant has submitted a Statement of Community Involvement (SCI). Based on the submitted SCI, the Applicant visited the neighbouring properties and engaged St John's Church of England School and Headstart Nursery. The SCI stated some concerns had been raised including the impacts on neighbouring residential amenity. No details have been provided to illustrate the number and address of the residents interviewed. A letter of support from St. John's School shows the school welcomes the proposed development as it would attract more families to the school within a walking distance, reduce the number of heavy vehicles, and provide amenity and ecological benefits.

Enfield Place and Design Quality Panel (DRP):

- 6.2 During the course of this application, the proposed development was brought to the Enfield Place and Design Quality Panel (hereby referred to as DRP) on 20 December 2022
- 6.3 The Panel suggests the Applicant provide further evidence to demonstrate that the development could realise the envisioned settlement idea and considerations such as density, mass, scale and layout should all take cues from the existing rural context, views and surrounding landscape.
- 6.4 The panel recognises that the applicant is keen to formulate a series of design codes but comments this is an unusual approach for a relatively small, discreet site. The panel considers that to arrive at a suite of design codes, greater consideration needs to be given to the definition of a brief along with key design principles. Given the context, the panel suggests some themes to inform design principles, and therefore design codes, including context, setting and landscape, topography, views, layout, community and open space, connectivity, transport, potential creation of 'village' high street, sustainable growth, biodiversity, approach to sustainable energy and a different tenure mix.
- 6.5 The offers including allotments, greenhouses, nature areas, and live-work units are welcome. The panel suggests that analysis of the value of the proposed development and future management costs shall be undertaken earlier to avoid the risk of the development being declared unviable and value engineered.

Officer comment: The matters raised are assessed in the 'Design', 'Housing Need and Mix', 'Economic considerations', 'Social consideration', 'Biodiversity, Trees and Landscaping', 'Traffic, Access and Parking' and 'Sustainable Design and Construction' sections of this report.

Statutory and Non-Statutory Consultees

External

Energetik:

- 6.6 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 'Sustainable Design and Construction' section of this report.

6.7 *Environment Agency:* No comment received

Great London Authority:

6.8 **Land Use Principles:** 100% affordable housing is proposed on what the GLA have contended is a previously developed site within Green Belt. GLA officers consider that the spatial and visual impact would not give rise to substantial harm to openness, taking into account the existing context. Therefore, the scheme could be considered to comprise appropriate development within the Green Belt and 'Very Special circumstances' are not required

Affordable housing: 58 new homes at 100% affordable housing, representing a 50:50 tenure mix. This could comply with the Fast Track Route criteria subject to the tenure mix being agreed with the Council. The affordability of all units and type of the intermediate housing should be clarified and secured.

Urban design: The design, layout and residential quality is acceptable, and the height and massing proposed would not harm heritage assets or cause substantial harm to the Green Belt

Transport: Conditions and obligations are required in relation to walking and cycling improvements, car parking, servicing and travel plan requirements

Sustainable development: Additional information and clarification is required in respect to the energy strategy, flood risk and drainage, whole life carbon (WLC) and circular economy

Conclusion: The application does not yet comply with the London Plan. Possible remedies set out in this report could address these deficiencies.

Officer comment: Officers disagree with the GLA and consider the site is not considered Previously Development Land according to the NPPF's definition. Officers therefore consider the scheme comprises inappropriate development within the Green Belt and 'Very special circumstances' are required. This matter was discussed in the 'Green Belt' section of this report.

The other GLA comments have informed the proposed dwelling size and tenure mix, level of accessible homes, the Energy Statement, Circular Economy Statement and Air Quality Assessment. The conditions identified in relation to energy, WLC, circular economy, air quality, flood risk, and car parking management plan are recommended in the 'Recommendation' section above. Furthermore, a financial contribution towards walking and cycling infrastructure improvements will be secured by a S106 obligation as stated in the 'S106 Heads of Terms' section below.

Historic England (GLAAS):

6.9 No objection subject to a written scheme of investigation (WSI) condition

Officer comment: The condition identified is recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Heritage and Archaeology, section of this report.

6.10 *Historic England*: No comment received.

6.11 *London Fire Brigade*: No objection subject to meeting the requirements of the Approved Document B (ADB) B5 Access and Facilities for the Fire Service.

Officer comment: During the course of this application, the design of the proposed works to Strayfield Road has been revised to ensure the whole stretch of carriageway of Strayfield Road would have a minimum width of 3.7m in accordance with the ADB B5. The matter raised is assessed in the 'Fire Safety' section of this report.

Metropolitan Police (Secured by Design):

6.12 No objection subject to a 'Secured by Design' condition to ensure the appropriate crime prevention practices and principals are followed.

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

6.13 *Natural England*: No comment received

6.14 *NHS London Healthy Urban Development Unit* – Requested a contribution of £94,795 to increase health infrastructure capacity within the locality of the development through reconfiguring and upgrading existing floorspace of Chase Farm Hospital.

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

Transport for London (TfL):

6.15 No objection subject to delivery of the pedestrian route works on Strayfield Road and the proposed bus stops improvements to replace the 'hail and ride' stops in accordance with TfL Bus Stop Accessibility Guidance and specifications TfL Asset Operations and TfL Engineering teams will further review the detailed design.

Officer comment: During the course of this application, the Highways Team has secured funding to introduce new fixed bus stops on Theobalds Park Road and Clay Hill. Upon the request from the Council's Transportation Team, a greater sum of financial contribution towards walking and cycling infrastructure in the locality was sought instead. The obligations 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.

Thames Water:

6.16 No objection with regard to the surface water network infrastructure capacity, foul water sewerage network infrastructure capacity, water network and water treatment infrastructure capacity. Thames Water recommended an informative about the minimum water pressure.

Officer comment: The informative identified will be included in the decision notice. The matters raised are assessed in the 'Flood Risk, Drainage, Sewerage and Water' section of this report.

6.17 *UK Power Networks*: No comment received.

6.18 *Enfield Disablement Association*: No comment received.

Internal

6.19 *Building Control*: The width of the emergency access on Strayfield Road should be no less than 3.7m unless approved by LFB.

Officer comment: During the course of this application, the design of proposed pedestrian route works to Strayfield Road have been revised to ensure the whole stretch of Strayfield Road would have a minimum width of 3.7m as stated in the ADB B5. The matter raised is assessed in the 'Fire Safety' section of this report.

Climate Action and Sustainability:

6.20 *No objection* subject to conditions to secure final energy strategy, whole life carbon assessment and use of Enfield Excess Materials Exchange platform.

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

6.21 No objection to the principle of the development. Further assessment and detailed design are required to ensure that the rural landscape character of the site would not be eroded, and that the increased visibility of the built form when compared to the existing greenhouses would not result in an adverse impact on its contribution to the setting of the Conservation Area. An insular suburb on the outskirts of the Clay Hill Conservation Area which conflicts with the settlement pattern and character should be avoided.

6.22 The Heritage Team have suggested the following requirements if the Application is to be approved:

- A S106 obligation to request details of the proposed Strayfield Road works including external lighting controls. The length of segregated pedestrian footway should be kept to a minimum and street furniture should be kept to a minimum and painted black
- In the absence of a parameter plan, a condition which limits the height of development to two storeys with a maximum ridge height of 8.5m and maximum volume is welcomed. However, this does not infer that all dwellings can be built to these limits at reserved matters stage.
- S106 obligation requiring the Applicant to enter a design competition or at least to attend Enfield Place and Design Quality Panel(s) prior to submission of each reserved matters application to ensure design quality of the development.
- A condition to require a 15m strip of the site at the northern boundary shall remain public space

Officer comment: The conditions identified are recommended in the 'Recommendation' section above. The suggested S106 obligation for design competition has been explored with the Applicant. However, the registered provider / the delivery partner is unknown at this stage, and a number of the potential delivery partners have their own

in-house design terms. Hence, a S106 obligation requiring the Applicant to attend Enfield Place and Design Quality Panel prior to submission of each reserved matters application is recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Built Heritage and Archaeology' section of this report.

Education

- 6.23 No objection subject to a financial contribution of £159,705 towards provision of education facilities to be secured via S106.

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

- 6.24 *Economic Development:* No comment received

Environmental Health:

- 6.25 No objection subject to conditions for piling method statement, land contamination mitigation scheme, compliance to emission standards for non-road mobile machinery, dust and emissions control measures, 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 and Distance', 'Air Quality' and 'Land Contamination' sections of this report.

Housing:

- 6.26 Support. There is an overarching need for affordable housing and particularly social rented units considering the recent increase in the number of residents on the housing needs register. As at Jan 2023, there were 5,000 households on the housing needs register.

- 6.27 Whilst the family housing is in demand, the priority is for supply across all bedroom sizes. The delivery of social rented properties could support downsizers and overcrowded households. The proposal provides a good offer on family housing. Wheelchair adaptable homes would meet the needs as there are families with mixed abilities who would benefit from this type of accommodation.

- 6.28 Supply is stalling recently given market conditions and rising build costs. There have been consented schemes being varied resulting in less affordable housing being offered or built out. The expression of interest letters from registered providers (RPs) provided by the Applicant are welcome. This scheme presents an opportunity for the council to secure housing through a nominations agreement and offer genuine affordable housing subject to restricting the homes to households meeting the GLA eligibility requirements.

Officer comment: The requirements identified will be secured by a S106 agreement as recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Housing Need and Mix' section of this report.

Journeys and Places:

- 6.29 The Transportation Team confirmed the proposed trip generations would be acceptable. The commitment to Travel Plan monitoring is welcome. The Transportation Team acknowledges the challenges in connectivity of the Site.
- 6.30 The proposed works to Strayfield Road to provide a safe pedestrian route between the site and bus stop are broadly welcome. The Transportation Team initially raised concerns over the design, deliverability and future maintenance of the proposed works to Strayfield Road. After a joint site visit and a number of revisions in the design and further clarifications from the Applicant, the latest Strayfield Road work proposals would be acceptable at this stage subject to final details (including road drainage) of the proposed Strayfield Road works together with Road Safety Audits, a construction and logistics management plan, a detailed management and maintenance plan for the Strayfield Road works. The Transportation Team also requested that the proposed works to Strayfield Road be completed prior to first occupation.
- 6.31 The Applicant initially proposed to introduce new fixed bus stops to replace the 'hail and ride' stops to service the 456 bus route. However, The Highways Team confirmed that the Council had secured funding to introduce new fixed bus stops on Theobalds Park Road and Clay Hill. The Transportation Team therefore requested a larger sum of active travel financial contribution towards improving the walking and cycling infrastructure in the locality .

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.

Watercourses:

- 6.32 No objection subject to a condition to secure the final sustainable drainage strategy 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, Drainage, Sewerage and Water' section of this report.

Trees:

- 6.33 No objection subject to a more detailed Arboricultural Method Statement and Tree Protection Plan to address the following impacts:
- Installation of tree protection (protective barriers and temporary ground protection)
 - Demolition of existing structures and removal of existing hard surfacing within Root Protection Areas
 - Construction within Root Protection Areas (if applicable)
 - Installation of new utility services/drainage and/or reconfiguration of existing service runs (all services to be illustrated within TPP)
- 6.34 The Tree Officer also requested an auditable schedule of arboricultural monitoring where works would need to be undertaken within Root Protection Areas in order to ensure continued compliance with the agreed tree protection scheme throughout the development process.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Biodiversity, Trees and Landscaping' section of this report.

Public

6.35 Consultation letters were sent to 127 surrounding properties on 01.07.2022 and 20.07.2023.

6.36 Site notices were put up on 11.07.2022. Press notices were displayed in the Enfield Independent on 22.06.2022 and 18.01.2023.

6.37 *Cllr Hannah Dyson, Cllr Reece Fox, Cllr David Skelton (LB Enfield Ward Councillor)*
Objection for the following reasons:

- Green Belt should be protected unless no suitable alternatives exist. The proposed development is inappropriate development within the Green Belt.
- Overdevelopment given only one access point though Strayfield Road and higher density than the surrounding developments. It would dramatically alter the nature and character of the countryside.
- The local transport provisions are already inadequate. The majority sections of the pedestrian routes to Crews Hill Station and Gordon Hill Station including Strayfield Road are unlit without segregated footway and therefore are unsafe to pedestrians particularly children particularly during dark winter months.
- The traffic assessment is based on outmoded data. The reduction in existing heavy goods vehicle traffic will be outweighed by the increase in new traffic from the development. The development would result in congestion and increased danger for local people.
- There are already cars parked along Strayfield Road for the nearby North Enfield Cricket Club, St John's Church and the St John's school. More houses would restrict emergency vehicles access through Strayfield Road during peak hours.
- Increase in traffic would be inconvenient and potentially dangerous for users of the adjacent Hilly Fields Park.
- No amenities within walking distance
- No information has been provided with regard to the excavation work on Strayfield Road to provide new sewers
- No proposed arrangement to 'make good' / maintain the unadopted Strayfield Road in case of any damage caused.
- Loss of habitats and wildlife
- Increase in air pollution and contrary to London Plan Policy SI 1.
- Increase in noise pollution
- Adverse impacts on the health and welling of local people
- Lack of community consultation. The 22 households contacted by Crews Hill Residents Association all expressed opposition to the development.
- The proposal displays lack of preparation and lack of awareness of the local area.

Officer comment: The matters raised are assessed in the 'Green Belt', 'Traffic, Access and Parking' and 'Consultation' sections of this report.

British Horse Society

- 6.38 Objection on grounds of potential impact on Strayfield Road (a public bridleway) during construction. To address this concern and remove the objection, a condition requiring the bridleway to be kept open throughout construction and fully accessible with no vehicles, plant or materials obstructing any part of it either during or following construction, should be attached to any permission granted. Furthermore, a request has been made for a financial contribution to be secured by s106 to provide and install physical speed restrictions along Strayfield to prevent speed in excess of 20mph being achievable by vehicular traffic and parking restrictions, as necessary, to ensure safe passage and visibility for equestrians along its length.

Officer comment: The matters raised are assessed in the 'Traffic, Access and Parking' section.

Crews Hill Residents Association

- 6.39 Maintain objection for the following reasons:

- No Very special circumstances to justify new development within Green Belt. It would breach the purposes of Green Belt as set out in the NPPF.
- Rossendale Close was a genuine brownfield site and should not be seen as a precedent. The existing dwelling on site is for security and maintenance purposes.
- Impact on greenhouse emissions
- Harm the openness of the countryside
- Potential road safety hazard at the Strayfield Road / Clay Hill junction given the car parked during school drop off and pick up times
- The proposed works on Strayfield Road would hinder large vehicles to the existing properties on Strayfield Road
- More dwellings may be built in future applications
- The proposed allotments may be built on if they are not used.

Officer comment: The matters raised are assessed in the 'Green Belt', 'Traffic, Access and Parking' and 'Sustainable Design and Construction' sections of this report. This outline application is for up to 58 homes, 5 live-work units and refurbishment of the existing offices. A new planning application would be required for any uplift in residential units from the approved quantum.

- 6.40 *Enfield Disablement Association:* No comments received.

Enfield Road Watch

- 6.41 Maintain objection for the following reasons:

- The site is within the Green Belt and the Clay Hill Conservation Area. No Very special circumstances to justify new development within Green Belt. It would breach three of the five purposes of the Green Belt set out in NPPF.
- Impact on greenhouse emissions
- The reduction in horticultural activities does not turn the site into brownfield land
- Lack of infrastructure and amenities
- The access for large vehicles using Strayfield Road will be obstructed
- A condition should be applied to prevent buildings on the proposed allotments in perpetuity to be built.

Officer comment: The Application site (outlined in red) is within the setting of Clay Hill Conservation Area (not directly within the Conservation Area). The matters raised are assessed in the 'Green Belt', 'Built Heritage and Archaeology', 'Traffic, Access and Parking' and 'Social Considerations' sections of this report.

Enfield Society

6.42 Maintain objection for the following reasons:

- The site is within the Green Belt and the Clay Hill Conservation Area. No 'Very special circumstances' to justify new development within Green Belt. Enforcement action against non-horticultural activities should be considered.
- Likely increase in vehicle movement due to very limited public transport in the area
- The application site is not part of the draft local plan site allocations. In view of its proximity to Hilly Fields Park, the Strayfield Road Cemetery and the Conservation Area, it is important that this site remains within the Green Belt designation.
- Need to protect the rural nature of the Clay Hill Conservation Area

Officer comment: The Application site (outlined in red) is within the setting of Clay Hill Conservation Area (not directly within the Conservation Area). The matters raised are assessed in the 'Green Belt', 'Traffic, Access and Parking' and 'Built Heritage and Archaeology' sections of this report.

Environment Forum

6.43 Maintain objection for the following reasons:

- A permanent loss of the Green Belt.
- No overwhelming justification for the loss of Green Belt.

Officer comment: The matters raised are assessed in the 'Green Belt' section of this report.

North Enfield Cricket Club

6.44 Objection for the following reasons:

- There are matches and practice sessions from late afternoon through the evening every week from mid-April to late July. The proposal will increase congestion and hinder access to the cricket club at peak traffic times.
- No indication of who would pay for the ongoing maintenance of the proposed measures
- No indication of the current access to the Cricket Club's gateway area to ensure no impacts on the operation of the Cricket Club.
- No impact assessment on the hedge along Strayfield Road and on the trees within the Sports Ground.
- A bespoke traffic management scheme is needed.

Officer comment: The matters raised are assessed in the 'Biodiversity, Trees and Landscaping' and 'Traffic, Access and Parking' sections of this report.

St John the Baptist Church

6.45 Neutral:

- Strongly in support of genuinely affordable homes for local people
- Increased road traffic and reduced parking availability on Strayfield Road may adversely affect the Church's regular activities, mass activities, and venue businesses which is an essential source of income.
- The increase in delivery traffic may harm the Church's foundations.
- The drain at the Clay Hill / Strayfield Road junction (on the Church's side) often overflows resulting in flooding across the road.
- Residents and visitors are likely to use cars as the existing public transport is not regular.

Officer comment: The matters raised are assessed in the 'Traffic, Access and Parking' and 'Built Heritage and Archaeology' sections of this report. No footway is proposed to the drain on the northern side of Strayfield Road near the Church. The potential impacts on the income of the Church are not a material planning consideration.

- 6.46 Objections to this application from 29 properties were received during the public consultation. A summary of the comments received, and officer comments are as follows:

Summary of responses

- Consultation period is too short

Officer comment

The LPA undertook consultation for 24 days when the application was first submitted in 2022. In July 2023, neighbouring properties were consulted on the additional clarifications and information for 14 days. The consultation was conducted in accordance with the statutory requirements set out in Article 15 of the Town and Country Planning (Development Management Procedure)(England) Order 2015.

Summary of responses

- Inappropriate development within the Green Belt in conflict with the local plan
- The existing residential development on the northern (opposite) side of Strayfield Road is not a precedent as it was used as a factory building with furnaces and smelting facilities.
- Many alternative sites could be used for residential development.
- The site has history of complaints against non-horticultural activities within the site.

Officer comment

The matters raised are assessed in the 'Green Belt' section of this report. The details of any complaints and enforcement are outside the scope of this application. As mentioned in the 'Green Belt' section, officers consider that the non-horticultural activities within the site do not make the whole site 'Previously Development Land'.

Summary of responses

- Encouraged to see brownfield land is repurposed
- Too high and too dense
- Overdevelopment with an addition of potentially 300 more people in the area
- Out of keeping with rural character of area
- Strayfield Road without lighting will become a hotspot for criminal activity

Officer comment

The matters raised are assessed in the 'Green Belt', 'Built Heritage and Archaeology', 'Design' and 'Traffic, Access and Parking' sections of this report. Bollard lighting is proposed as part of the proposed Strayfield Road works.

Summary of responses

- Potential buy to let landlords would acquire these 'affordable' homes and rent them out at unaffordable prices.
- The definition of 'affordable housing' and who gets access to these houses are not clear.

- Should have more live-work units and workspaces to create a more diverse mix

Officer comment

The matters raised are assessed in the 'Housing Need and Mix' and 'Economic Consideration' sections of this report.

Summary of responses

- Loss of privacy during construction
- Loss of privacy as their bedroom windows overlooking the Site.
- Loss of outlook from Astley House and Rossendale Close
- Noise from construction traffic
- Noise from rear gardens of the new development and increase in traffic
- Impact on quality of life of existing residents
- Increase in air pollution from the reliance on cars due to the lack of community facilities in close proximity, the lack of safe pavement on Strayfield Road and fast and heavy traffic on Clay Hill

Officer comment

The matters raised are assessed in the 'Neighbouring Residential Amenities' and 'Air Quality' sections of this report.

Summary of responses

- Aged sewer systems
- Poor water pressure

Officer comment

The matters raised are assessed in the 'Flood Risk, Drainage, Sewerage and Water' section of this report.

Summary of responses

- Inaccurate ecological surveys. There are bats and Great Crested Newts in existing ponds.
- Destroy the existing trees and natural habitat of wildlife

Officer comment

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

Summary of responses

Parking

- Inadequate parking
- The proposed electric car charging solution is unclear. Inadequate supply of electricity.

Trip generation

- Unsustainable location with no amenities such as shops, doctor's surgeries, secondary schools and libraries within walking distance from the site.
- Strayfield Road cannot accommodate additional 200 cars trips.
- Clay Hill is too narrow for large vehicles including buses to pass each other. Collisions happened before.
- Clay Hill and Theobalds Park Road are busy with dangerous bends and corners. Given the associated on-street parking during school pick-up and

drop off and the potential future expansion of Headstart nursery, the additional traffic to Clay Hill and Theobalds Park Road would be dangerous.

Access on Strayfield Road

- Strayfield Road is a private unadopted road with no segregated footway and lighting which would be dangerous during evenings and winter. An accident occurred before. Adverse impact on the walkers, cyclists and equestrians.
- Vehicular movement is particularly difficult during school pick up and drop off and the church's events such as funerals and weddings as parents to the nearby school, visitors to the nearby Church, North Enfield Cricket Club and Hilly Fields Parks, nearby residents and the farms all park on Strayfield Road.
- Insufficient emergency vehicle access given the proposed single lane bottleneck at the lower end of Strayfield Road and the on-street parking.
- Officers have not visited the site during school times and Sunday morning during church services and cricket club activities.
- The give way situation should not encroach the existing vehicular accesses to the adjoining properties including Burnbrae Cottage, 1 and 21 Strayfield Road, and the Church. The effects on existing vehicular access to the properties including 2 Strayfield Road is not clear. No consent has been given for any works involving 2 Strayfield Road.
- Requested measures to ensure adequate parking provisions for church visitors.
- Lack of details including bollards lighting, street names, wayfinding information. No comprehensive map showing the boundaries of the church, its junction with Clay Hill. Wayfinding information for the proposed pedestrian crossing should be improved.
- Unclear whether the junction between Clay Hill and Strayfield Road will be narrowed.
- The proposed works should preserve the character of the area
- Strayfield Road is unadopted and in poor condition. Flooding occurred at the proposed new crossing as the drain blocks without regular maintenance. The maintenance responsibilities of the proposed low level bollard lighting, the road, other road installations and drainage are unclear. The maintenance should not cost taxpayers money. Installations may be vulnerable to vandalism. A clear protocol for reporting issues and timely resolution of issues should be outlined.
- A comprehensive traffic management plan should be provided.
- A dedicated road cutting through the field facing the proposed homes cutting straight into Theobalds Park Road should be proposed.

Public transport and access to amenities

- Inadequate public transport provisions. The 456 bus route offers very limited services.
- There are only partial footways on Theobalds Park Road and Cattlegate Road between the Site and Crews Hill station
- The pedestrian route from the Site to Gordon Hill stations through the cemetery would not be safe to use in the evenings and during winter given no lighting in the cemetery.

- The proposed southbound bus stop should be sited before the Flash Lane/Clay Hill junction to allow clear visibility of the buses for the other drivers.

Construction traffic

- Works shall not be taken place on a Sunday to enable free movement to and from the church.

Officer comment

The matters raised are assessed in the 'Traffic, Access and Parking' and 'Built Heritage and Archaeology' sections of this report.

Summary of responses

- Poor broadband and potential adverse impacts on the existing broadband services.

Officer comment

The matters raised are assessed in the 'Digital Connectivity' section of this report.

Summary of responses

- Potential land contamination

Officer comment

The matter raised is assessed in the 'Land Contamination' section of this report.

Summary of responses

- Impact on property price

Officer comment

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

Petition

6.47 A petition of objection was submitted by the Crews Hill Residents Association on 29 June 2022. The petition purported to have 47 signatories. Some of them have also submitted their own objections as mentioned in paragraph 6.46. The grounds of objection set out in the petition's covering statement are set out in detail below:

- No 'Very special circumstances' to justify new development within Green Belt.
- It would breach three of the purposes of Green Belt set in the NPPF.
- The existing dwelling on site is for security and maintenance purposes. The site is not a brownfield site and is in horticultural use.
- Only a small number of older residential dwellings existed before Metropolitan Green Belt was established and are part of the Clay Hill Conservation Area. The proposed development would harm the openness of the countryside.
- The privately owned unadopted Strayfield Road is not suitable for additional traffic particularly at the Clay Hill / Theobalds Park Road junction
- Potential road safety hazard at the Strayfield Road / Clay Hill junction given the car parks during school drop off and pick up times

Officer comment: The matters raised are assessed in the 'Green Belt', 'Built Heritage and Archaeology' and 'Traffic, Access and Parking' sections of this report.

6.48 A letter of objection was submitted by the St John's Mobile Home Park on 31 July 2023. The petition purported to have 16 signatories. Some of them have also submitted their own objections as mentioned in paragraph 6.46. The grounds of objection set out in the letters are set out in detail below:

- Inappropriate development within the Green Belt and Conservation Area
- Too dense and is out of keeping with the character of the local area
- High levels of additional traffic and noise in an area and at a road junction that already experiences traffic issues associated with school access and church events
- Misrepresents accessibility and adequacy of public transport in the local area and will inevitably generate significant extra traffic usage
- Inadequate level of safety for pedestrians from the development using Strayfield Road
- Adverse impact on the current condition and usage of Strayfield Road which is heavily used for local parking by parents, church and cricket club.

7. Relevant Planning History

Application site

| REFERENCE | DESCRIPTION | DATE | DECISION |
|-----------------|---|--------------------|-----------|
| 20/02697/FUL | Erection of replacement detached outbuilding | 24 August 2020 | Submitted |
| TP/97/0250 | Erection of a replacement office building with ancillary staff facilities, incorporating storage area in roofspace involving construction of dormer windows to north and south elevation, together with provision of additional car parking spaces. | 30th May 1997 | Approved |
| TP/96/1025 | Erection of a replacement office building with ancillary staff facilities, incorporating accommodation in roofspace involving construction of dormer windows to north elevation, together with provision of additional car parking spaces | 14th Jan 1997 | Approved |
| TP/96/1024 | Erection of a new greenhouse block, together with provision of additional car parking spaces | 14th Jan 1997 | Approved |
| TP/95/0698 | Erection of a replacement greenhouse/potting shed | 28th November 1995 | |
| ENFIELD_8026B | New glasshouses | | Approved |
| EDMONTON 8026 | Office extension | | Approved |
| ENFIELD 8026 | Bungalow | | Approved |
| ENFIELD 8026A | Bungalow | | Approved |
| ENFIELD 8026A/1 | Details | | Approved |

Surrounding Site – Rosendale Close (On the opposite/northern side of Strayfield Road)

- 7.1 TP/00/0345 Redevelopment of site by the erection of 12 5-bed detached houses together with associated access road and garage blocks. **Granted with conditions** 18 May 2000

8. Relevant Planning Policies

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

National Planning Policy Framework 2021

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

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

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

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

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

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

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

b) local market conditions and viability;

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

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

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

Green Belt

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

8.6 The NPPF makes clear that the government attached great importance to Green Belts (para 137). Paragraphs 147 – 151 of the NPPF provide guidance to decision makers for proposals that affect the Green Belt.

- Paragraph 147 states 'Inappropriate development is, by definition, *harmful to the Green Belt* and should not be approved *except in very special circumstances*.
- Para 148 states "Very special circumstances' will not exist *unless the potential harm* to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, *is clearly outweighed by other considerations*."
- Paragraph 149 notes that a local planning authority *should regard the construction of new buildings as inappropriate in the Green Belt, with a number of exceptions*.
- Paragraph 149(g) states: limited infilling or the *partial or complete redevelopment of previously developed land*, whether redundant or in continuing use (excluding temporary buildings), which would *not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt*, where the development would *re-use previously developed land and contribute to meeting an identified affordable housing need* within the area of the local planning authority.

Presumption in Favour of Sustainable Development:

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

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

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

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

- 8.8 Footnote (7) advises that the national policies referred to at (d)(i) above include policies relating to land designated as Green Belt. Paragraph 147 of the NPPF states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'Very special circumstances.
- 8.9 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.*"
- 8.10 In summary, the presumption in favour of sustainable development applies in two situations – where a Council is unable to demonstrate a five-year housing land supply, and when a Council fails to achieve 75 per cent or more in the Housing Delivery Test.
- 8.11 Enfield Council currently fails against both criteria – and is therefore subject to the most severe government sanctions which impact the Council's consideration of housing-led planning applications.
- a) **5-year housing land supply:** Members will note the need to be aware of the Council's housing land supply – and how it impacts on decision making. When there is not an up to date Local Plan and 5-year housing land supply cannot be demonstrated then this has a significant impact on the weight given to material planning considerations. The NPPF presumption, or 'tilted balance', applies in Enfield due to the Council's inability to demonstrate the required five-year housing land supply. The Council is unable to demonstrate a 5-year supply of deliverable housing sites and this impacts on the status of its Local Plan policies.
- b) **Housing delivery test:** The NPPF presumption, or 'tilted balance', also applies in Enfield because Enfield is one of 51 Councils which have achieved below 75 per cent against the Housing Delivery Tests – it is therefore also subject to the Housing Delivery Tests most severe government sanction, the NPPF's presumption in favour of sustainable development.
- 8.12 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.
- 8.13 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".
- 8.14 The Council's recent housing delivery has been below our housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and being placed in the "presumption in favour of sustainable development category" by the Government through its Housing Delivery Test. This status has recently been confirmed for the period 2022-23.

- 8.15 The Department for Levelling Up, Housing and Communities has not published the latest Housing Delivery Test measurement for 2022. Based on the Enfield Authority Monitoring Report 2021/22 published in February 2023, between 1st April 2019 and 31 March 2022, Enfield delivered 2,350 homes of the 3,216 required, achieving 73% of its homes target. The Council therefore remains in the “presumption in favour of sustainable development”.
- 8.16 Based on the Enfield Authority Monitoring Report 2021/22 published in February 2023, there is an estimated supply of 5,676 net new homes in the next five years. This is equivalent to 3.80 years housing land supply when measured against the London Plan requirement and taking into account backlog need and a 20% buffer due to the failure of Housing Delivery Test.
- 8.17 This is referred to as the “tilted balance” and the NPPF states (see paragraph 8.6 above) that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan.

Overall Planning Balance

- 8.18 However, in this case, the proposed development is in the Green Belt and therefore as noted at Footnote 7 above paragraph 11 (d) (i) will need to be considered. Whilst the development plan policies are ‘out of date’, the Planning Committee will first need to consider whether the proposed development meets national Green Belt policies in line with paragraph 11(d)(i). If the Planning Committee considers that the proposed development would be inappropriate development in the Green Belt, to which none of the exceptions at paragraph 149 NPPF apply and for which ‘Very special circumstances’ do not exist, then the Council should refuse permission in line with paragraph 11(d)(i) and the tilted balance will not apply. If the Planning Committee considers that the proposed development would be inappropriate development in the Green Belt but ‘Very special circumstances’ do exist, then the Planning Committee should weigh up the adverse impacts and benefits of the scheme and the tilted balance will apply in accordance with paragraph 11(d)(ii).
- 8.19 Under the NPPF paragraph 11(d) where the most important development plan policies for the application are deemed to be ‘out of date’, planning permission should be granted. That does not mean out of date policy can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be given weight by the Planning Committee when undertaking their assessment taking account of the “tilted” balance that applies. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

The London Plan 2021

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

- GG1 – Building Strong and Inclusive Communities
- GG2 – Making the Best Use of Land
- GG3 – Creating a Healthy City

- GG4 – Delivering the Homes Londoners Need
- D3 – Optimising Site Capacity through the Design-Led Approach
- GG5 – Growing a good economy
- 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 – D8 Public realm
- D11 – Safety, Security and Resilience to Emergency
- D12 – Fire Safety
- D14 – Noise
- E1 – Offices
- E2 – Providing suitable business space
- H1 – Increasing housing supply
- H4 – Delivering Affordable Housing
- H5 – Threshold Approach to Applications
- H6 – Affordable Housing Tenure
- H10 – Housing Size Mix
- HC1 – Heritage conservation and growth
- G2 – London's Green Belt
- G5 – Urban Greening
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- G8 – Food growing
- S1 – Developing London's social infrastructure
- S2 – Health and social care facilities
- S3 – Education and childcare facilities
- S4 – Play and informal recreation
- S4 – Play and Informal Recreation
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions
- SI3 – Energy Infrastructure
- SI4 – Managing Heat Risk
- SI5 – Water Infrastructure
- SI6 – Digital connectivity infrastructure
- SI7 – Reducing Waste and Supporting the Circular Economy
- SI12 – Flood Risk Management
- SI13 – Sustainable Drainage
- T2 – Healthy Streets
- T3 – Transport Capacity, Connectivity and Safeguarding
- T4 – Assessing and Mitigating Transport Impacts
- T5 – Cycling
- T6 – Car Parking
- T6.1 – Residential Parking
- T6.2 – Office parking
- T6.5 – Non-residential disabled persons parking
- T7 – Deliveries, Servicing and Construction
- T9 – Funding transport infrastructure through planning

Local Plan - Overview

- 8.21 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.

Enfield Core Strategy: 2010

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

| | |
|-------|---|
| CP2: | Housing supply and locations for new homes |
| CP3: | Affordable housing |
| CP4: | Housing quality |
| CP5: | Housing types |
| CP9: | Supporting community cohesion |
| CP13: | Promoting economic prosperity |
| CP19: | Offices |
| 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 |
| CP33: | Green Belt and countryside |
| CP36: | Biodiversity |
| CP46: | Infrastructure contributions |

Development Management Document (2014)

- 8.23 The Council's Development Management Document (DMD) provides further detail and standard based policies by which planning applications should be determined. Policies in the DMD support the delivery of the Core Strategy.
- 8.24 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 |
| DMD25 | Locations for New Retail, Leisure and Office Development |
| DMD37 | Achieving High Quality Design-Led Development |
| DMD38 | Design Process |
| DMD45 | Parking Standards |
| DMD47 | New Roads, Access and Servicing |
| DMD48 | Transport Assessments |
| DMD49 | Sustainable Design and Construction Statements |
| DMD50 | Environmental Assessment Methods |
| DMD51 | Energy Efficiency Standards |
| DMD53 | Low and Zero Carbon Technology |
| DMD55 | Use of Roof Space / Vertical Surfaces |
| DMD56 | Heating and Cooling |
| DMD57 | Responsible Sourcing of Materials |
| DMD58 | Water Efficiency |
| DMD59 | Avoiding and Reducing Flood Risk |
| DMD60 | Assessing Flood Risk |
| DMD61 | Managing Surface Water |
| DMD65 | Air Quality |
| DMD66 | Land contamination and instability |
| DMD68 | Noise |
| DMD69 | Light Pollution |
| DMD70 | Water Quality |
| DMD72 | Open Space Provision |
| DMD73 | Children's Play Space |
| DMD76 | Wildlife Corridor |
| DMD78 | Nature Conservation |
| DMD79 | Ecological Enhancements |
| DMD80 | Trees on Development Sites |
| DMD81 | Landscaping |
| DMD82 | Protecting the Green Belt |
| DMD89 | Previously Developed Sites in the Green Belt |

8.25 Other Material Considerations

The Environment Act 2021

The Planning (Listed Buildings and Conservation Areas) Act 1990 – sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (Section 66). In relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area” (Section 72).

National Planning Practice Guidance

Technical housing standards – nationally described space standard (2015)

TfL London Cycle Design Standards (2014)

Mayor of London Housing SPG (Adopted March 2016)

Affordable Housing and Viability SPG (2017)

Draft Development Viability LPG (2023)

Draft Affordable Housing LPG (2023)

Energy Guidance LPG (2021)

Be Seen Energy Monitoring LPG (2021)

Play and Informal Recreation SPG (2016)

Housing Design Standards LPG (2023)

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)
 Community Infrastructure Levy Regulations 2010 (as amended)
 The Setting of Heritage Assets – Historic Environment Good Practice Advice in
 Planning: 3, Historic England (2017)

Enfield S106 Supplementary Planning Document (2016)
 Enfield Local Housing Needs Assessment (2020)
 Enfield Blue and Green Strategy June (2021)
 Enfield Waste and Recycling Storage Planning Guidance (2010),
 Enfield Local Heritage List (May 2018)
 Clay Hill Conservation Area Management Proposal (2015)
 Clay Hill Conservation Area Character Appraisal 2015)
 Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)

Enfield Local Plan (Reg 18) 2021

- 8.26 Enfield Local Plan (ELP) - 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.
- 8.27 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan, while noting that account needs to be taken of emerging policies and draft site proposals.
- 8.28 Key local emerging policies from the plan are listed below:
 Strategic Policy SPPL9 Crews Hill
 Site Allocation 27 Crews Hill
 Strategic Policy BG4: Green Belt and Metropolitan Open Lane
 Strategic Policy BG5: Green Belt and edges of countryside
 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

8.29 Currently, the draft ELP contains a number of placemaking policies focused on areas of growth which present opportunities to bring benefits to local communities. One of these is a proposed rural placemaking area at Crews Hill as set out in draft Policy PL9. The Council's updated Local Development Scheme (March 2023) refers to a timetable for work on the future new Local Plan 2023-37. The indicative timetable below envisages publication of a proposed submission Local Plan (Regulation 19) in winter 2023:

- The Enfield Local Plan (Regulation 19) will be going to Full Council on 22nd November 2023, to seek approval to publish.
- Anticipate publishing in December 2023 / January 2024.
- There will be a 12 week publication period.
- Anticipate submitting for examination, later in 2024.

Given the stage of the preparation of the draft ELP at the time of writing this report, the policies in the ELP hold no planning weight.

In advance of the ELP, the Core Strategy, Development Management Plan and the London Plan will continue to constitute the development plan for the borough. Notwithstanding, the draft ELP indicates the direction of travel for planning policy in the borough and sets out the borough's ambition for future growth.

Relevant planning appeals and case law

2020 Surrey Heath Borough Appeal Dismissed

8.30 **Ref: APP/D3640/W/19/3235041: Castle Grove Nursery, Scotts Grove Road, Chobham, Woking GU24 8DY:** This appeal was dismissed on 23 January 2020 for 40 dwellings. The inspector noted that glasshouses are not regarded as inappropriate in the Green Belt, being buildings for agriculture falling within the list of exceptions set out in paragraph 145 of the NPPF whose effects on openness are implicitly acceptable. The position in respect of the assessment of Green Belt openness when the existing buildings are in horticultural use is relevant to the consideration of this application.

- Paragraph 11 of the appeal decision sets out that effects of inappropriate development on the openness of the Green Belt should not be ascertained with reference to those of the existing horticulture development because the existing development is an acceptable use in Green Belt by definition. It states *'Despite both this, and the fact that the proposed development would be inappropriate in the Green Belt, the appeal scheme has been promoted on the basis that its built-form would occupy less space than the glasshouses, and thus that it would have a less impact on the openness of the Green Belt. However, in this context effects on openness cannot be ascertained with reference to those of the existing development on site, given the latter are, by definition, acceptable'*

8.31 **Supreme Court Judgement on Openness of Green Belt: R.(Samuel Smith Old Brewery (Tadcaster) and others) v Yorkshire County Council [2020] UKSC 3:** This judgement dated 05 Feb 2020 related to a judicial review of the decision made by Yorkshire County Council to grant planning permission for an extension to the operational face of Jackdaw Crag Quarry. The case considered the concept of 'openness' in the NPPF and confirmed that *"matters relevant to openness in any particular case are a matter of planning judgement, not law"* (para 39).

8.32 **Court of Appeal Judgement on Openness of Green Belt: Turner v SSCLG & East Dorset Council [2016] EWCA Civ 466:** This judgement dated 18 May 2016 related to a judicial review of the decision made by the East Dorset Council to refuse planning permission and the Planning Inspectorate to dismiss the appeal for a proposal to replace a mobile home and storage yard with a three-bedroom residential bungalow. The case considered the assessment on 'openness' and confirmed that it has a 'visual' as well as 'spatial' or 'volumetric' dimension – “[openness should not be] narrowly limited to [a] volumetric approach” but “is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case”.

8.33 **High Court Judgement on Previously Developed Land and Very Special Circumstances: R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin):** This judgement dated 30 January 2015 related to a judicial review of the decision made by Broxbourne Borough Council to grant outline planning permission for 90 homes in a former nursery site.

- The case considered the definition of 'previously developed land' (PDL) and confirmed that the presence of some PDL within a site does not make the whole site PDL.
- The case also considered 'Very Special Circumstances' and confirmed that it is not necessary to go through the process of considering whether a factor is not a very special circumstance but nonetheless falls to be taken into account in favour of the development as another relevant material consideration.

2021 Enfield Council Appeal Allowed

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

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

2021 Enfield Council Appeal Allowed

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

- Paragraph 54 notes “The evidence shows that at present, they {the Council} can demonstrate a supply {Housing} of just over two years...that

would make LP Policy D9 (amongst others) out-of-date”

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

2022 Enfield Council Appeal Allowed

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

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

9. Analysis

9.1. The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise. Furthermore, paragraph 11 (c) of the NPPF goes on to state that development proposals that accord with the development plan should be approved without delay.

9.2. As explained at Section 8, in this case, the proposed development is in the Green Belt. Whilst the development plan policies are ‘out of date’, the NPPF states that for decision making that means refusing permission if the national Green Belt policies in the Framework provides a clear reason to do so in line with paragraph 11(d)(i). If the Planning Committee considers that the proposed development would meet the Green Belt policies in the Framework, then the Council is subject to the so called “tilted balance” and the NPPF paragraph 11 (d) (ii) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning

judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

- 9.3. This report sets out the analysis of the issues that arise from the proposal when assessed against the development plan and the NPPF
- 9.4. The main considerations of the development are the following:
- Green Belt
 - Agricultural Land
 - Housing Need and Mix
 - Economic considerations
 - Social considerations
 - Built Heritage and Archaeology
 - Design
 - Neighbouring Residential Amenities
 - Quality of Accommodation
 - Biodiversity, Trees and Landscaping
 - Traffic, Access and Parking
 - Flood Risk, Drainage, Sewerage and Water
 - Sustainable Design and Construction
 - Fire Safety
 - Air Quality
 - Land Contamination
 - Digital Connectivity
 - Planning Balance

Green Belt

Green Belt policy context

- 9.5. The site is within the Green Belt, which is a significant material planning consideration and fundamental to the proposed development.
- 9.6. Paragraph 147 of the NPPF states “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in ‘Very special circumstances.
- 9.7. Paragraph 148 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 9.8. Paragraph 149 identifies the construction of new buildings as inappropriate in the Green Belt, but with some exceptions identified. The Applicant suggests Point (g) of paragraph 149 is relevant to this application:

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

9.9. Policy G2 of the London Plan identifies that the Green Belt should be protected from inappropriate development: development proposals that would harm the Green Belt should be refused except where 'Very special circumstances' exist, and the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported. This echoes with Policy 33 of the Core Strategy (2010) and Policy DMD 82 of the Development Management Policies (2014)

9.10. Due to the Green Belt designation, the main factors to be considered in establishing the acceptability of the principle of development are:

- 1) Whether or not the proposal would constitute inappropriate development in the Green Belt having regard to any relevant development plan policies and the NPPF;
- 2) If the proposal is inappropriate development whether harm by reason of inappropriateness and any other harm would be clearly outweighed by other considerations so as to amount to the 'Very special circumstances' required to justify the proposal

(1) Appropriateness

9.11. Enfield's DMD policies defer to the NPPF in defining what constitutes '*inappropriate development*' in the Green Belt. As mentioned above paragraph 149 of the NPPF sets out that construction of new buildings in the Green Belt should be considered as inappropriate except for certain exceptions. The Applicant considers that the application site is an exception under paragraph 149(g) as detailed at paragraph 9.8 above. None of the other exceptions set out under paragraph 149 are considered relevant to the application site. Hence, in order to determine whether or not the site constitutes an exception as per paragraph 149(g), the first test to be considered is whether the site can be considered to be 'Previously Developed Land' (PDL).

- *Is the Application site previously developed land?*

9.12. The NPPF defines Previously Developed Land as "*Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.*" [emphasis added]

9.13. Section 336 of the Town and Country Planning Act 1990 (TCPA) defines agriculture as "*horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (any creature kept for the production of food, wool, skins or fur, or for the*

purpose of its use in the farming of land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds^[1], and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes, and 'agricultural' shall be construed accordingly."

- 9.14. The applicant argues that the site is PDL within the Green Belt and suggests the site is currently in sui generis use. The applicant's assumption of existing use class is predicated on treating the entire site as a single planning unit which it suggests is in mixed-use.
- 9.15. Legal advice has confirmed that PDL is not defined by reference to the lawful use of a planning unit as a whole. The definition of PDL focuses on the lawful use of land on which buildings and their curtilages sit. In the case of *R (Lee Valley Regional Park Authority) v Broxbourne Borough Council* [2015] EWHC 185 (Admin), Ouseley J held that the presence of some PDL within a site does not make the whole site PDL. The extent of PDL will be defined by the extent of the curtilage of any building. Consequently, the fact that part of the Site is used for non-horticultural uses does not mean that the whole Site (or the whole of any planning unit comprising the Site) is PDL.
- 9.16. Table 2 below summarises the lawful use of each building on the site and assesses whether those uses fall within any of the exceptions from the NPPF definition of PDL (i.e. in this case, is the use agricultural).

Table 2 Assessment of whether the curtilage of the buildings is PDL

| Buildings | Existing use | Is the curtilage of the buildings PDL? |
|--|---|--|
| (a) The glasshouses and buildings for storage, packaging and distribution. | <p>I. The Applicant suggests there are non-horticultural activities including a range of aquatic baskets and aquatic plant display trays which are exported across the UK and internationally. Products are imported and then sold directly to customers, including plants, pots, and bottled oxygen cannisters.</p> <p>II. The applicant has also stated that since 1986 the business operating at the site has manufactured display trays, baskets and pots for aquatic plants, which at one point was producing 1000 trays per season. Other commercial activities have taken place at the site including a swimming ponds business from 2011 to 2013, a business importing fish for sale to angling clubs and private estates, a haulage company from early 1980s until 2016, and a building used for Anglo Tooling for at least 20 years.</p> <p>III. However, no planning permission nor a certificate of lawfulness has been formally granted for the change of use of these buildings. Evidence has been submitted as part of this application to demonstrate the site has been in such commercial uses for more than 10 years to deem lawful use status:</p> | No |

| | | |
|--|--|--|
| | <p>i. The evidence includes invoices, the earliest of which is 20 September 2010 and the most recent is 10 February 2022. The invoices show what was being purchased and where it was being sent to. However, there are no records for 2014 which would assist in demonstrating that the use had been in place consistently for 10 years.</p> <p>ii. There is also a sworn statement from the owner provided that describes how the site has been used over time. The information contained is useful in explaining the uses and processes that have taken place over time, and is not disputed as an accurate record. However, this does not demonstrate a settled use for a continuous period of 10 years. For example, Anglo Swimming Pools is identified as a construction business operating from the site. It is suggested that this operated from 2001 to 2013. Days Transport is identified as a haulage company operating from the site. It appears to have operated until 2016, but it is not clear when it started.</p> <p>iii. The applicant has also provided Trade Price List Extracts, the earliest of which is from 1986. They are of some value and demonstrate that some products were available for sale. However, in isolation they are not considered to demonstrate a settled use for a continuous period of 10 years.</p> <p>iv. The applicant has identified that the most recent Enfield Strategic Housing Land Availability Assessment (2020) included the site and identified it as "Mixed use office, residential, industrial, storage, retail". However, this did not involve a detailed assessment of the lawful use, and this was one of over 600 sites identified.</p> <p>IV. The Applicants' Planning Statement and sworn statement state that 64.5% of Anglo Aquatic's sales remain horticultural. At least part of the glasshouses is therefore likely used for the cultivation of plants for sale by the business. There was no indication of the geographical extent of non- horticultural use or business on the site.</p> <p>V. Prior to this current application, the most recent planning application (ref: 20/02697/FUL) for the demolition of existing propagation glasshouse and erection of a replacement corrugated steel building for storage and distribution was submitted in August 2020. The Planning Statement submitted describes the site as "The nursery complex comprises three large glass house buildings (facilitating plant propagation) that cover the vast majority of the site's area and a collection of smaller <u>ancillary</u> packaging, storage and distribution buildings' and suggests the proposed building at the time "will specifically be used as an 'internet shed'</p> | |
|--|--|--|

| | | |
|------------------------|--|----|
| | <p><u>ancillary to the wider horticultural use of the nursery..”</u> Therefore, in 2020 a development was promoted at the site that identified the existing use as agricultural land and that the proposed building was ancillary to what was already taking place at the site. Whilst the application was invalidated, and the applicant ultimately did not pursue the application, this 2020 planning application was made presumably on behalf of the Applicant, and they would have been aware of the existing uses at the time.</p> <p>VI. The website of the current occupier shows the glasshouses are still used as a plant nursery.</p> <p>VII. Based on the case officer’s on-site observation, it also appears that the glasshouses and the buildings for storage, packaging and distribution are currently used for plant nursery-related uses.</p> <p>VIII. On the balance of probabilities, for the purpose of assessing this planning application and establishing the existing lawful use of the above mentioned buildings, it is considered that these buildings therefore remain in agricultural use as a plant nursery, and are therefore excluded from the definition of PDL.</p> <p>IX. It is noted that the submitted Planning Statement suggests that some commercial activities were undertaken including Days Transport, Anglo Tooling and Anglo Swimming Ponds. Some of these commercial activities have ceased. Any potential breach of planning control would be further investigated by the Enforcement Team but is outside the scope of this planning application.</p> | |
| (b)The office building | <p>I. The offices were also permitted pursuant to a separate planning permission (ref: TP/97/0250/1) granted in 1997. The delegated report at the time was assessed on the basis that the office buildings would be ancillary to the horticultural use. Condition 8 of this planning permission restricts the use of the office to ancillary to the nursery operation at the site.</p> <p>II. No planning permission nor certificate of lawfulness has been granted for a change of use of the office building.</p> <p>III. Based on officer’s site visit observation, the office building is also in use by the current occupiers of the nursery and appears to support the operation of the existing nursery.</p> <p>IV. On the balance of probabilities, for the purpose of assessing this planning application and establishing the existing lawful use, the office building therefore remain as ancillary to the nursery use and is therefore excluded from the definition of PDL.</p> | No |

| | | |
|------------------|--|-----|
| (c) The bungalow | <p>I. The planning history shows that the application for the bungalow (ref: ENFIELD 8026) was granted prior to the existence of the glasshouses.</p> <p>II. It has a separate address (i.e.30 Strayfield Road). It is understood that the dwelling has not always been in the same ownership as the remainder of the site even though it is currently.</p> <p>III. The bungalow therefore is not considered to be ancillary to agriculture use.</p> | Yes |
|------------------|--|-----|

9.17. Accordingly, in line with the definition set out in the Section 336 of the TCPA 1990 the majority of buildings covering the site constitute agricultural buildings and therefore are excluded from the definition of Previously Developed Land^[2]. Only a very small proportion of the site occupied by the dwellinghouse is considered to be 'previously developed land'. It is noted that the provision of affordable homes on this small section of PDL could potentially meet the exception test at paragraph (g) provided they would not result in substantial harm to the openness of the Green Belt. However, this section of the PDL is very small and only occupies 2.4%¹ of the total site area. Hence, the majority of the site would not meet the exception test (g) and the proposed development is therefore considered to be inappropriate development within Green Belt under paragraph 149.

9.18. Four appeal decisions and cases are referred to by the Applicant in their Planning Statement. Three of the decisions² did not hinge on whether the development was on PDL or not as both the applicant and Council did not dispute on this matter. The *Chester Nursery*³ appeal decision, in which the Inspector appeared to conclude that the presence of some PDL on the site in question rendered the whole of that site PDL, was determined before the *Lee Valley* case, in which the Court held the opposite. Furthermore, the *Allen v Secretary of State for the Environment* [1990] JPL 340 case referred to, only deals with the question as to what amounts to an ancillary use, and is therefore of limited relevance. Hence, these decisions and cases therefore carry limited weight when interpreting the NPPF definition of PDL.

9.19. It is acknowledged that the Stage I response from the GLA has not contradicted the applicant's position that the land is PDL. It is not known if the GLA officer conducted a site visit. LBE Officers conducted visits on 16 January and 13 July 2023. As detailed above, officers also sought legal advice to review the evidence provided by the Applicant and establish the legal principles of defining PDL with references to case law and appeal decisions.

9.20. For the reasons outlined above, officers conclude that the majority of the site except bungalow's curtilage is not previously developed land. The proposed development therefore would be inappropriate in the Green Belt. Inappropriate development is by definition harmful to the Green Belt, and paragraph 144 of the Framework indicates that substantial weight should be given to any such harm. Officers therefore attach

¹ The footprint of the bungalow together with the hardstanding within its curtilage is approximately 650m² based on the case officer's measurement on the submitted existing site plan. The total site area is circa 26,700 m²

² *Oak Tree Farm* (Appeal Ref. APP/L3625/W/21/3271384), *Hayes Street Farm* (Appeal Ref. APP/G5180/W/18/3206947) and *Langley and Mile Nurseries* (Appeal Ref: APP/J1535/W/20/3259315)

³ Appeal Ref: APP/B1930/A/13/2199820.

substantial weight to the harm that the development would cause by reason of its inappropriateness.

(2) Openness of the Green Belt

- *(a) Context*

- 9.21. Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. The recent Supreme Court decision in *R.(oao Samuel Smith Old Brewery) v Yorkshire County Council* [2020] UKSC 3 [1] confirmed that “*matters relevant to openness in any particular case are a matter of planning judgement, not law*” (para 39). *Turner v. SSCLG* [2016] EWCA Civ 466 further sheds light on the definition of openness, and suggests that it has a ‘*visual*’ as well as ‘*spatial*’ or ‘*volumetric*’ dimension – “*[openness should not be] narrowly limited to [a] volumetric approach*” but “*is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case*”.
- 9.22. ‘Buildings for agriculture’ fall within the list of exceptions set out in paragraph 149 of the Framework. As such they are not inappropriate within the Green Belt. This exception implicitly takes into account the effects of such development on the openness of the Green Belt. The glasshouses on site are therefore of a type of building whose effect on the openness of the Green Belt is acceptable in principle, regardless of considerations of size or appearance.
- 9.23. In the appeal decision relating to the redevelopment of the site for the erection of residential development of 40 dwellings at Castle Grove Nursery, Scotts Grove Road, Chobham, Woking GU24 8DY (ref: APP/D3640/W/19/3235041), the inspector states the following in paragraph 11:

Despite both this, and the fact that the proposed development would be inappropriate in the Green Belt, the appeal scheme has been promoted on the basis that its built-form would occupy less space than the glasshouses, and thus that it would have a less impact on the openness of the Green Belt. However, in this context effects on openness cannot be ascertained with reference to those of the existing development on site, given the latter are, by definition, acceptable. Indeed, were I to take the contrary view, it would undermine the logic underpinning national policy as set out within the Framework. It is therefore necessary to consider the effects of the proposed development in its own terms, and on its own merits

- 9.24. In light of the principle stated in the above appeal, the impacts of the proposed development on the openness of the Green Belt (both spatial and visual aspects) are considered in its own terms and on its own merits.

- *(a) Assessment*

- 9.25. This outline application is for access only with all other matters reserved. The assessment is based on the proposed maximum footprint, maximum ridge height and maximum volume set out in the submitted Planning Statement and the Landscape Visual Impact Assessment. These maximum design parameters are summarised in Table 3 below.

Table 3: Comparison of existing vs proposed situation

| Metric | Existing | Proposed | Change |
|-----------------------------|--|--|----------------|
| Footprint (m ²) | 18,438 | 5,021 | -13,417 (73%) |
| Height (m) | Glasshouses: 3.5m to the ridge. Warehouses: 3.7m - 8m to the ridges Office building: 7.3m to ridge Residential dwelling: 4.4m to ridge. | Maximum 2 storeys with 8.5m to the ridge | N/A |
| Volume (m ³) | 56,065 | 32,144 | -23,921 (-43%) |

- 9.26. There are some two storey residential properties on the opposite (northern) side of Strayfield Road. There is a row of hedgerow along the frontage of the site. It is nevertheless clear from outside the site, and in views from Strayfield Road and the Strayfield Road Cemetery in particular, that the site does not currently contain housing.
- 9.27. The application proposals would introduce built development to the site in the form of 58 dwellings and 5 live works with associated access roads and pavements, enclosed residential gardens, open space and driveways. The precise layout and form of the development would be determined at reserved matters stage. These solid built forms would inevitably have more permanent physical and visual presence than the existing transparent glasshouse structures, and would collectively occupy a reduced but still significant amount of space across the site. The proposed development would inevitably still be visible from outside the site via the access, and would be experienced upon accessing and moving around the site itself during winter times when foliage is less dense.
- 9.28. Even taking into account the Applicant's commitments to substantial reduction in built footprint (13,417m³) and volume (23,921 m³) together with enhancements to the site's landscaping, including a significant reduction in hardstanding (See also Biodiversity, Trees, and Landscaping Section) which could be integral to the layout of the residential development proposed, the proposed development still would have the effect of a considerable reduction in the openness of the site considering the principle of assessment of openness set out in the *Castle Grove Nursery* appeal decision (ref: APP/D3640/W/19/3235041) mentioned in paragraph 9.23.
- 9.29. For the reasons outlined above, officers conclude that the development would cause significant harm to the openness of the Green Belt. In view of paragraph 144 of the Framework, officers attach **substantial weight** to the harm that would be caused.
- 9.30. With regard to the public consultation comments noting that there are alternative sites for development, there is no policy requirement for a sequential test for the proposed development within Green Belt.

(3) Purposes of the Green Belt

- 9.31. The Applicant has undertaken an assessment against the five Green Belt purposes in the submitted Landscape Visual Impact Assessment (LVIA). The Council has undertaken a borough-wide Green Belt and Metropolitan Open Land Study by LUC (June 2021) to the Green Belt across the whole borough as part of the Council's emerging Local Plan (ELP) Evidence Base. Whilst the Council's study has not assessed the application site as a separate parcel, it is included within the overall maps.
- 9.32.
- 9.33. Table 4 indicates the assessment of the contributions against the five Green Belt purposes. It is the most up to date evidence base. Hence, it carries weight in the assessment.

Table 4: Assessment against the purposes of Green Belt in the Council's Emerging Local Plan Green Belt Study and the Applicant's LVIA.

| Purposes of Green Belt | Council's Emerging Local Plan Green Belt Study (considering a wider parcel up to the railway line to the west and Crews Hill settlements to the north) | Applicant's assessment |
|---|--|----------------------------------|
| 1. Check the unrestricted sprawl of the large built-up area | Strong contribution | No Contribution |
| 2. Prevent neighbouring towns from merging into one another | Weak/no contribution | Relatively Weak Contribution |
| 3. Assist in safeguarding the countryside from encroachment | Strong contribution | Relatively Weak Contribution |
| 4 Preserve the setting and special character of historic towns - | Weak/no contribution | Relatively Weak Contribution |
| 5 Assist in urban regeneration, by encouraging the recycling of derelict and other urban land | Strong contribution | No assessment has been provided. |

- 9.34. The Council's Green Belt and Metropolitan Open Land Study states:

The land to the south of Strayfield Road and north of Strayfield Road Cemetery makes a strong contribution to purposes 1, 3 and 5; however, its release in combination with the Green Belt land to the north up to the southern edge of Crews Hill would have a relatively minor/negligible impact on the distinction of the adjacent Green Belt land due to the presence of strong boundary features – notably a railway line to the west, and the cemetery to the south – and the presence of existing inappropriate development associated with the washed over settlement of Clay Hill to the east.

- 9.35. It is noted that the application site is within the Crews Hill Placemaking Area in the emerging plan. The impact on the purposes of the Green Belt may change as the emerging Enfield Local Plan progresses through the plan-making process. At this stage it has limited weight in the decision-making process although the level of weight that can be attributed will increase through the plan-making process. The next draft of the plan (Regulation-19) is due to be considered at Full Council on 22 November 2023. The plan will carry increasing weight from regulation-19 to examination and then adoption.
- 9.36. The piecemeal residential development by reason of its inappropriateness within Green Belt in the current policy context (prior to any adopted changes in Green Belt

policy) would inevitably be contrary to the purposes of the Green Belt. In this specific location, there are some residential properties on the opposite (northern side) of Strayfield Road. The presence of Strayfield Road cemetery to the south and the Hilly Fields Park woodland to the east effectively restricts any further urban expansion except to the west.

- 9.37. As a result of these locational characteristics and influences, the consequences of the development at the application site would mean that the proposals would have only a localised effect on the Green Belt. The broad thrust of function and purpose of the Green Belt in this location would largely remain and there would result in some encroachment into the countryside. Officers therefore consider that the proposal would result in minor harm in term of the encroachment of the Green Belt in this location. The minor harm to the purposes of the Green Belt carries **moderate weight**.

Conclusion on Green Belt

- 9.38. The majority of the site remains in agricultural uses and is not considered PDL. Hence, the proposed development does not meet any exception tests and is considered inappropriate development within the Green Belt. The proposed development would result in substantial harm to the Green Belt by virtue of its inappropriateness, harm on openness (both visual and spatial) and minor harm by the loss of the purpose in safeguarding the countryside from encroachment. Hence, the Applicant is required to demonstrate that the harm would be clearly outweighed by other considerations so as to amount to the 'Very special circumstances' required to justify the proposal
- 9.39. The Applicant considered the following benefits of the proposed development constitute Very special circumstances. Officers have assessed these considerations in more detail in the following relevant sections of this report. In the 'Very Special Circumstances / Planning Balance' section, officers have assessed whether VSCs exists when considering all the benefits in combination.

| Very Special Circumstances proposed by the Applicant | Detailed assessment in the relevant sections of this report |
|--|---|
| a) Affordable housing need | Housing Need and Mix |
| b) Housing delivery/supply | |
| c) Economic benefits | Economic Considerations |
| d) Biodiversity net gain | Biodiversity, Trees and Landscaping |
| e) Provision of community amenities | Social Considerations |
| f) Improvement to sustainable transport links | Traffic, Access and Parking |

Loss of Agricultural Land

- 9.40. Paragraph 174 of the NPPF states planning decisions should recognise the economic and other benefits of the best and most versatile (BMV) agricultural land. Footnote 59 states where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. BMV agricultural land is graded 1 to 3a where 1 is the best.
- 9.41. Strategic level mapping suggests the site is Agricultural Land Classification 3. It is noted that no soil surveys have been provided to indicate whether the site constitutes grade 3a (i.e., part of BMV). In any event, the existing horticultural use features substantial hardstanding at the moment, which is lawful. There is no reasonable

prospect that the existing hardstanding will be removed even if the proposed development is not pursued. The proposed development would achieve a biodiversity net gain on-site (See also Biodiversity, Trees and Landscaping' section). Furthermore, the site is a discrete, isolated piece of agricultural land, and its development would not directly lead to any further agricultural land being lost. There is no evidence suggesting that granting permission would set an undesirable precedent. Natural England did not comment on this application. Officers therefore place **limited** weight on the loss of agricultural land.

Housing Need and Mix

- 9.42. The current London Plan sets a target for the provision of 52,287 new homes each year. In addition, the London Plan identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the current target of 798.
- 9.43. 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. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reasons for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords).
- 9.44. 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.
- 9.45. Core Policy 5 outlines that the Council will seek a range of housing types in the intermediate sector and that the mix of intermediate housing sizes will be determined on a site by site basis. It should also be noted that the evidence base to support Core Policy 5 dates from 2008. The Local Housing Needs Assessment 2020, which informs the emerging draft Local Plan for Enfield, is a more up to date evidence base. Hence, it carries weight in the assessment.
- 9.46. The Local Housing Needs Assessment (LNHA) 2020 identifies that among those on the Council's housing register waiting list, 14.7% need one-bedroom, 35.3% need two bedrooms, 42.3% need three-bedrooms, and 7.7% need four or more bedrooms.
- 9.47. The LNHA has informed emerging Policy H3 of the Draft Local Plan for Enfield (2021). The table below is an extract from Policy H3, which outlines priority types for different-sized units across different tenure. The focus of affordable ownership provision (social/affordable rented) should be on two-bedrooms and 3 bedrooms units. It is noted that the Draft Reg 18 Local Plan was published in June 2021 and is at an early stage of preparation. Although this draft policy in the emerging plan carries limited weight now, it is used to illustrate the most up-to-date housing need in Enfield.

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

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

- 9.48. As stated in paragraphs 8.15 and 8.16, Enfield only delivered 73% of homes required in the preceding three years (i.e., 2019 - 2022), failing to pass the Housing Delivery Test. Also, there is only an estimated 3.80 years housing land supply when measured against the London Plan requirement and taking into account backlog need and a 20% buffer due to the failure of Housing Delivery Test, failing to demonstrate 5-year housing land supply.
- 9.49. Based on the latest statistics in the Enfield Authority Monitoring Report 2021/22 published in February 2023, between FY2011 and FY2021, the proportion of affordable housing (gross) delivered is 27% of the completed conventional homes (the total number of net homes completion are below target on average over the ten-year period. This falls significantly below the Adopted Local Plan target of 40% affordable provision and highlights the substantial under-delivery in the Borough over the last 10 years.
- 9.50. The proposed 58 affordable homes (100% of the proposed homes) far exceed the policy requirements of the London Plan Policy H5, which sets a 35% threshold and the Policies CP3 and DM1 of the Adopted Enfield Local Plan, which require 40% provision. Whilst the emerging Local Plan currently carries limited weight, it is worth noting that the Strategic Policy SP H2 (3)(c) of the emerging Enfield Local Plan (2021), states that 50% affordable housing is required in all areas of the Green Belt. The proposed development will make a significant contribution to the 1,407 affordable homes per annum needed in Enfield over the emerging plan period identified in the LHNA (2020).
- 9.51. As shown in
- 9.52. Table 5, the proposed bedroom x tenure mix would broadly meet the housing needs identified in the LNHA (2020) (See paragraph 9.46). In particular, 29 homes (50%) will be social rent including 20 x 3 bedroom homes, which are identified as high priority in the borough in the LHNA (2020).

Table 5: Proposed bedroom and tenure mix (by unit)

| Tenure | 2 Bedroom | 3 Bedroom | Total units by tenure | Tenure mix % |
|-----------------------------|-----------|-----------|-----------------------|--------------|
| Social Rent | 9 | 20 | 29 | 50% |
| Shared Ownership | 7 | 16 | 23 | 40% |
| London Living Rent | 2 | 4 | 6 | 19% |
| Total units by bedroom size | 18 | 40 | 58 | |
| Bedroom mix (%) | 31% | 69% | | |

- 9.53. 10% of the units will be M4(3) wheelchair accessible homes which will be split equally between Social Rent and Intermediate affordable housing. All the remaining homes

will be M4(2) wheelchair adaptable, which would meet the London Plan Policy D5 requirements.

- 9.54. London Plan Policy H5(d) states that development which provides 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant. Paragraph (e) further states that fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).
- 9.55. Given the overall affordable home provision (100% affordable) and the policy-compliant proposed tenure and bedroom mix, the proposed development can follow the fast-track viability route. Hence, a viability assessment is not required in accordance with London Plan Policy H5(d). The Applicant has agreed that the eligibility, affordability and early review mechanisms would be secured through a S106 in line with the GLA Affordable Housing and Viability SPD (2017).
- 9.56. Officers have also sought legal advice on the weight to be given to the affordable housing commitments given a viability assessment has not been submitted. Relevant to weight is the fact that the applicant is willing to enter into a s.106 agreement to secure the provision of affordable housing at 100%. Should the applicant be unable to do so, the Council will be able to take enforcement steps against the Applicants in accordance with s.106 TPCA 1990. Therefore, in the absence of any evidence to suggest that the applicants will not be able to deliver the level of affordable housing proposed, officers consider the absence of viability assessment does not affect the weight placed on the affordable housing offer in the proposed scheme.

Conclusion on housing need and mix

- 9.57. This 100% affordable homes scheme therefore far exceeds the affordable housing policy threshold required by the London Plan (35%) and adopted Enfield Local Plan (40%) and the emerging Enfield Local Plan (50%). The proposal would contribute significantly to increasing the affordable housing stock in the borough and meeting the most acute need in terms of tenure mix (50% Social Rent: 50% Intermediate) and bedroom mix (69% 3 bedroom homes) within the Borough.
- 9.58. Given the substantial shortfall in 5 years housing land supply (3.8 years), under delivery of housing supply in the last three years (meeting 73% of the housing targets), and the long term under-delivery of affordable homes, officers therefore place **substantial weight** to the delivery of new family homes and **substantial weight** to the delivery of affordable homes which would also have high energy efficiency and help reduce ongoing energy costs for the future lower income occupiers and alleviate fuel poverty (see also Sustainable Design and Construction section).

Economic Considerations

- 9.59. 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.
- 9.60. DMD 25 seeks to direct new major office development to Enfield Town and the borough's four district centres. The site location is therefore not considered an appropriate location for offices. However, it is acknowledged that the office building is

existing. Its refurbishment and change of use from ancillary to horticultural to offices (Class Use E(g)) would not undermine the spatial strategy of locating offices in town centre locations. On balance, the proposed change of use of the existing office building would be acceptable.

- 9.61. The submitted Economic Statement states that there are 10 existing employees at the site including 4 office-based jobs. It is proposed to refurbish the existing office building into flexible office space or smaller units suitable for micro, small and medium-sized enterprises, which is estimated to provide a minimum of 18 FTE jobs. It is also proposed to deliver five live-work units as supported by NPPF paragraph 82(d). The proposed live-work units are estimated to provide at least 5 FTE jobs. As a result, a net increase in 13 FTE jobs is estimated.
- 9.62. The details of the refurbished office will be assessed at the reserved matters stage. With regard to the live-work units, following requests from officers, the Applicant has made the following commitments:
- A minimum of 455 sqm of employment floorspaces across the five live-work units
 - Employment floorspaces in these units are limited to Class E
 - The occupancy of the living area would be restricted to people working full-time in the business and these units would be equipped with provision of superfast broadband or equivalent.
 - Submit full details of the live-work units including the extent and type of commercial workspace together with a management plan of how these would be controlled and the division of space between residential and commercial space at the reserved matters stage

These commitments would be secured through appropriately worded conditions.

- 9.63. The submitted Economic Statement also estimates that the proposed development would support 139 direct or indirect jobs during the construction phase. The Applicant is also committed to an Employment & Skills Strategy to provide apprenticeship and procure local labours, goods and materials. This would be secured by a S106 obligation.

Conclusion on Economic consideration

- 9.64. The new employment opportunities generated through construction and the commitments to an Employment and Skills Strategy are standard expectations for any major developments in the borough. The estimated uplift in employment opportunities generated through refurbishment of the existing offices and new live-work units are supported. However, the Site is not within any town centre locations and is not considered an appropriate location for offices as suggested in DMD 25. It is also not located in proximity to any other existing clusters of offices or live-work spaces. The Applicant has not engaged any delivery partners nor provided any market assessment to demonstrate the levels of demand for these proposed employment floorspaces at this location, officers therefore place **limited weight** on the economic benefits in the assessment.

Social considerations

Food growing areas

- 9.65. DMD 85 states that the use of land for growing food, including commercial and community food growing, will be supported throughout the borough.

- 9.66. The Applicant has committed to provide a minimum 850sqm food growing area including greenhouses, of which 764sqm will be allotments which would be open to residents of the proposed development and residents of the surrounding area. The location of the allotment will be assessed in the reserved matters application to ensure it is accessible for the wider communities and integrates with the wider landscape (See also Built Heritage and Archaeology section).
- 9.67. The Applicant has also committed to promote the allotments to the wider community and support the setup of the non-profit making management group to manage the allotments through the following:
- Provide topsoil and water supply infrastructure prior to first occupation of the proposed development
 - Maintain the land until the local management group is formed.
 - Make a one-off payment of £10,000 to support the non-profit making local management group
 - Charge peppercorn ground rent to use the area
 - Make a payment of £5,000 to the local management group for purchase and erection of greenhouses if the group consider necessary

These commitments would be secured through the S106 Agreement.

Education

- 9.68. St. John's Primary School and the Headstart Crews Hill Day Nursery & Pre-School on Theobalds Park Road are both within 10 minutes' walk from the Site. Further afield, St Michaels and Lavender Academy and One Degree Academy are circa 30mins' walk from the Site.
- 9.69. The Statement of Community Involvement submitted with the application shows a letter of support for the development from the headteacher of the nearby St. John's primary school in 2022.
- 9.70. The Education Team has been consulted and confirmed a financial contribution of £159,705 (calculated in accordance with para 9.11 of the adopted S106 SPD) towards would be sufficient. A financial contribution will be secured by a S106 agreement to help mitigate the impacts of the proposed development on the primary school and early years.

Healthcare

- 9.71. The Chase Farm Hospital is located 2km away from the Site. There are three general practices on Tenniswood Road and Chase Side (within 2.5km). London Healthy Urban Development Unit have been consulted and suggested a financial contribution of £94,795 be paid to enable the NHS to reconfigure and upgrade the existing floorspace in Chase Farm Hospital to improve the health infrastructure capacity within the locality including for acute and mental healthcare provision. A financial contribution towards an upgrade of the existing healthcare provision in Chase Farm Hospital would be secured through the S106 agreement to mitigate the impact of the additional demand for healthcare services from the proposed development.

Conclusion on social consideration

- 9.72. The financial contributions towards education and health facilities are secured to mitigate the impacts of the development. They are neutral factors which weigh neither

in favour nor against the proposed development in this assessment. The provision of the community allotments would meet the need of the community growing areas in the locality and are supported by the policies. There are no minimum requirements for the provision of such facilities. Hence, the proposed provision is considered to exceed the policy requirement, officers therefore place **moderate weight** to the benefit of the community growing areas in this assessment.

Built Heritage and Archaeology

- 9.73. Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty on planning authorities to safeguard the special interest of listed buildings and their settings. Section 72 of the Act imposes a statutory duty on planning authorities to preserve or enhance the character and appearance of conservation areas. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”. *In relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area”.*
- 9.74. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be (para 199). Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting (para 200). Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting (Annex 2). There should be ‘clear and convincing’ justification for any harm to, or loss of, a designated heritage asset (para 200). Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (para 202).
- 9.75. London Plan Policy HC1 requires development proposals which affect the setting of heritage assets (designated and non-designated) to be sympathetic to their significance and appreciate their surroundings. Harm should be avoided, and enhancement opportunities taken where they arise. ECP31 of the Local Plan requires that special regard be had to the impacts of development on heritage assets and their settings, Policy DMD 44 advises applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused whilst Policy DMD 37 requires that development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.
- 9.76. 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 Court of Appeal judgment in *Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EW Civ 137* confirms that the assessment of the degree of harm to the heritage asset is a matter for the planning judgement of the decision-maker. However, where the decision-maker

concludes that there would be some harm to the heritage asset, in deciding whether that harm would be outweighed by the advantages of the proposed development (in the course of undertaking the analysis required by s.70 (2) of the Town and Country Planning Act 1990 and s.38 (6) of the Planning and Compulsory Purchase Act 2004, the decisionmaker is not free to give the harm such weight as the decision-maker thinks appropriate. Rather, Barnwell Manor establishes that a finding of harm to a heritage asset is a consideration to which the decision-maker must give considerable importance and weight in carrying out the balancing exercise. There is therefore a “strong presumption” against granting planning permission for development which would harm a heritage asset. In *Forge Field v Sevenoaks* [2014] EWHC 1895 (Admin), the High Court explained that the presumption is a statutory one. It is not irrefutable. It can be outweighed by material considerations powerful enough to do so. But a local planning authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering. The case-law also establishes that even where the harm identified is ‘less than substantial’ (NPPF para 199), that harm must still be given considerable importance and weight. Where more than one heritage asset would be harmed by the proposed development, the decision-maker also needs to ensure that when the balancing exercise is undertaken, the cumulative effect of those several harms to individual assets is properly considered. Considerable importance and weight must be attached to each of the harms identified and to their cumulative effect. It is important to note that the identification of ‘less than substantial harm’ does not equate to a ‘less than substantial’ objection⁴. 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 considerations⁵. What follows is an officer assessment of the extent of harm which would result from the proposed development.

- 9.77. 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

- 9.78. The site of the proposed development is immediately adjacent to the Clay Hill Conservation Area. It forms a part of the Conservation Area’s setting. The application site forms a part of a unique landscape character within Enfield – ‘Nursery and Glasshouse Centre’ – as identified in The Enfield Characterisation Study (2011). The tradition of growing produce is an important part of Enfield’s landscape heritage and should where possible be preserved and enhanced. The existing greenhouses on site are of limited visibility within the immediate vicinity as a result of local topography and the existence of mature vegetation. Where the greenhouses are visible, they are very clearly of an agrarian character and contribute to east-west transition from the village core to a rural agrarian landscape.
- 9.79. Located to the south-west of the site is the Locally Listed Rendlesham Viaduct an imposing local landmark which provides elevated views of the Conservation Area.
- 9.80. To the east of the site is Locally Listed Hilly Fields Park which makes an important contribution to the landscape character of the Conservation Area.

⁴ Barnwell vs. East Northamptonshire DC 2014 (para.29)

⁵ Kinsey vs. London Borough of Lewisham 2021 (para.84)

- 9.81. NPPF paragraph 194 requires that in the determining of applications that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be appropriate to the asset's significance.
- 9.82. A Heritage Statement was prepared by Squire Heritage Consulting and submitted in support of the planning application. The report assesses designated and non-designated built heritage assets that may be affected by the development, including the contribution of their settings to their significance, and concludes with an assessment of impact of the proposed development on the significance of relevant built heritage assets.
- 9.83. The Heritage Team have no in-principle objection to the residential development in the site and requested further details to ensure no harm to heritage assets. Since this application is an outline application for the access only with all matters reserved, officers are satisfied this can be achieved through conditions and S106 obligations at the reserved matters stage.
- 9.84. To ensure the layout of the development would reflect the settlement pattern in Clay Hill and preserve the semi-rural character and appearance of Strayfield Road and thereby give greater certainty that the character and appearance of the Conservation Area and its setting will be preserved, a condition is recommended to make sure there will be a 15m buffer from the northern site boundary to allow sufficient landscaping such as hedges, allotments and playspace while the proposed new buildings could face onto these landscaping features and provide passive surveillance to Strayfield Road (See also Design section). This would also avoid car parking dominating the frontages (See also Design section). This condition is supported by the Heritage Team. An external lighting condition will also minimise the visual presence of the new buildings at night and the resultant impact of the proposed development on the local character.
- 9.85. In order to preserve the setting of the Clay Hill Conservation Area, a compliance condition is recommended to ensure no buildings will be more than 2 storeys with a ridge height capped at 8.5m measured from the existing ground level. The layout, massing and roof forms of the proposed buildings together with a submission of Landscape Visual Impact Assessment will be further assessed at the reserved matter application stages to ensure the design responds to the site topography and minimise the visibility of the built form and preserves the unique landscape character of the 'Nursery and Glasshouse Centre' as experienced within immediate, medium and longer distance views during winter months as well as in the evenings. The landscaping condition will also secure tall native species boundary hedges within integrated trees to be maintained in perpetuity around the perimeter of the site. Furthermore, following the request from the Heritage Team, the Applicant has also agreed to attend Enfield Place and Design Quality Panel prior to submission of each reserved matters application to ensure the design quality, which would be secured through a S106 agreement.
- 9.86. With regard to the proposed work on Strayfield Road, the amount of segregated pedestrian footway has been minimised while ensuring safety for the pedestrians (See also Traffic, Access and Parking section). The Applicant has also revised the design to the segregated pedestrian footway to raised pavement with kerbstone to minimise the urbanising effect on the semi-rural character and appearance of Strayfield Road. The timber bollards providing low-level lighting are considered acceptable subject to adaptive lighting and motion sensors to minimise light pollution. The Applicant has also

committed to minimise the street furniture and keep it black. The design details of the proposed work on Strayfield Road will be secured through a S106 agreement.

- 9.87. The Heritage Team confirmed that the greenhouses and allotments would reflect the heritage of the area and help mitigate against the residential character of the site. In order to fulfil their potential as a tangible link to the site's heritage, the provision of food growing areas will be secured through the landscaping condition. Long term management and maintenance of these areas will also be secured through a S106 agreement (See also Social Considerations section).
- 9.88. It is noted that a concern was raised during public consultation in relation to the impacts of the heavy traffic vehicles on the integrity of the foundation of the Grade II Listed Church of St John the Baptist. However, no evidence has been provided to demonstrate clearly the impacts of the existing heavy vehicles traffic on the Grade II Listed Church to support the comments received. The proposed development would remove the large goods vehicles (LGVs) traffic associated with the existing aquatic plant and reduce volume of LGVs on Strayfield Road. In any event, the LGVs trips on the Strayfield Road associated with the proposed development are commonly found on any other roads in proximity to a listed building.

Archaeology

- 9.89. The application site lies within the Whitewebbs Hill, Bulls Cross and Forty Hill Area of Archaeological Importance. Following the comments from G.L.A.A.S, the Applicant has submitted a revised Archaeological Desk-based Assessment prepared by CSA Environmental, which includes specialist Palaeolithic and geoarchaeological assessment of the site to inform the potential of the underlying geology and the site situation. A walkover survey from a qualified archaeologist was also undertaken to inform on existing impacts. Furthermore, the revised assessment has now included historic mapping predating the 1860s as well as the detailed results of any local archive search.
- 9.90. G.L.A.A.S have confirmed that the revised Archaeological Desk-based Assessment and the proposed development would not adversely impact below-ground remains of archaeological interest in Whitewebbs Hill, Bulls Cross and Forty Hill Archaeological Priority Area subject to a Written Scheme of Investigation condition to ensure all historic environment investigation and recording is appropriately controlled. A condition has therefore been attached.

Heritage Conclusions

- 9.91. The steps for assessing proposals affecting heritage assets are as set out in the NPPF Section 16: Conserving and Enhancing the Historic Environment and amplified by Historic England GPA 3: The Setting of Historic Assets. The duty to pay 'special regard' or 'special attention', in sections 16(2), 66(1) and 72(1) of the Act (1990) means that there is a 'strong presumption' against the grant of planning permission where it would cause harm to a heritage asset⁶. Harm should be minimised and the desirability of enhancing the asset considered. Any harm to a designated asset requires 'clear and convincing' justification. For non-designated heritage assets there should be a 'balanced judgement' between harm and the significance of the asset.
- 9.92. This is an outline application for the access only with all other matters reserved. Officers consider that the proposed development could result in no harm to the existing

⁶ Kinsey vs. London Borough of Lewisham 2021 (para.82)

built heritage assets subject to a high quality building and landscape design at the reserved matters stage. Compliance conditions regarding the 15m landscape buffer from the northern site boundary, maximum height of 2 storey with ridge height capped at 8.5m, a condition requesting further LVIA, and S106 obligations regarding undertaking design review panel and details of the design of the Strayfield Road works would help ensure that the new development would assimilate into the landscape and minimise the visual impact. The proposed development would also not adversely impact below-ground remains of archaeological interest in Whitewebbs Hill, Bulls Cross and Forty Hill Archaeological Priority Area subject to a Written Scheme of Investigation condition to ensure all historic environment investigations and recording is appropriately controlled. Officers therefore considered the impact on heritage is a **neutral factor** which weighs neither in favour nor against the proposed development in this assessment.

Design

- 9.93. Paragraph 126 of the NPPF underscores the central value of good design to sustainable development. The Framework expects the planning process to facilitate “high quality, beautiful and sustainable buildings and places”. As in Paragraph 130, the assessment of a scheme should take into account the endurance of the design, visual appeal, sensitivity to local context, sense of place, optimisation of the site and contribution to health and wellbeing.
- 9.94. London Plan Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged.
- 9.95. 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.
- 9.96. This application is an outline application for the access only with all matters reserved. This application was presented to the Design Review Panel with the indicative layout and massing. The DRP commends the ambition to provide a mix of uses on the site, including serviced office space in the existing office building and five live/work units and suggested that the Applicant undertake further detailed design analysis further at the reserved matter stages. Below are some key areas to be further explored.
- Maximisation of active frontage along Strayfield Road (See also Built Heritage and Archaeology section’).
 - Variety in roofscape and detailing
 - Integration of the landscape features to provide multiple benefits
 - Careful design of the interface between the proposed residential and employment elements
- 9.97. The final design details including landscaping details and lighting strategy would be dealt with at the reserved matters stage. S106 obligations and compliance conditions are attached to secure the minimum quantum of live-work units (See also Economic Considerations section), publicly accessible allotment (See also Social Considerations section), and greenery (See also Biodiversity, Trees and Landscaping section), which are the key components of the proposed development which would benefit the wider general public.

- 9.98. It is noted that GLA Officers suggested the Applicant provide a design code. However, LBE Officers consider that this approach is not necessary given this is a relatively small, discreet site. This view is also supported by the DRP.

Secure by Design

- 9.99. The Met Police Designing Out Crime Officer has confirmed no objection to the application. A condition has also been attached to ensure the proposed development attain 'Secured by Design' certification in accordance with Policy D11 of the London Plan (2021) and Policy DMD 37 of the Development Management Document (2014).

Conclusion on Design

- 9.100. This application is an outline application for the access only with all matters reserved. The detail design will be dealt with under the reserved matters stage. Officers therefore consider the overall impact on neighbouring residential amenities is a **neutral factor** which weighs neither in favour nor against the proposed development.

Neighbouring Residential Amenities

Daylight, sunlight, overshadowing and privacy

- 9.101. Nos 1 and 4 Rossendale Close and Astley House (29 Strayfield Road) are the nearest two storey residential properties on the opposite (northern) side of Strayfield Road. There are some habitable windows in the northern elevation of these three properties and private amenity of No.4 face Strayfield Road, which are sited circa 13.5m away from the application site. The rear gardens of 1 Rossendale Close and Astley House are sited to the north of the main properties, away from the application site.
- 9.102. This outline application seeks approval for access only with all other matters reserved. The submitted site plan is indicative. Given the proposed maximum eaves height (5.3m) and ridge height (8.2m), the separation distance between the subject site and the northern windows of the nearest residential properties and 1 Rossendale Close and the expected set-back of the proposed built form from Strayfield Road (See also Heritage section), it is unlikely that the proposed development would result in unacceptable loss of daylight, sunlight, overshadowing and privacy subject to further scrutiny of the layout and form of the development at reserved matters stage.

Noise and Disturbance

- 9.103. Given the proposed additional net trip generation and the decrease in heavy vehicle trips (See also the Traffic, Access and Parking section), the proposed development would not result in an unacceptable level of noise and disturbance to the residential properties on Strayfield Road nor other properties in Crews Hill. A piling method statement will also be secured via condition to protect nearby residents from noise and disturbance during construction as requested by the Environmental Health Officer who has confirmed no objection to the proposal.

Conclusion on Neighbouring Residential Amenities

- 9.104. Having regard to the above, it is unlikely that the proposal would cause any significantly detrimental impact on the amenities of any neighbouring dwellings in terms of noise, disturbance, daylight, sunlight, outlook and overlooking subject to further assessment at the reserved matters stage. It would be in accordance with Policies D3, D4, D6 and D14 of the London Plan (2021), CP 4 of the Enfield Core Strategy (2010) and Policies DMD 8, 10, 37, and 68 of the Enfield Development Management Document (2014).

Officers therefore considered the overall impact on neighbouring residential amenities is a **neutral factor** which weighs neither in favour nor against the proposed development.

Quality of Accommodation

- 9.105. The internal layout of the homes will be assessed at the reserved matters stage to ensure the homes are compliant to housing design standards. The Applicant has also committed to provide at least 595 m³ playspace on-site to meet the minimum requirement stated in Policy S4 of the London Plan . The landscape and playspace details will be secured through a planning condition. As part of this condition, completion of the on-site amenity space and playspace will be required prior to first occupation of the new homes. Officers therefore consider the quality of accommodation to the future occupiers is a **neutral factor** which weighs neither in favour nor against the proposed development.

Flood Risk, Drainage, Sewerage and Water

- 9.106. Flooding is not a known risk on this site and the existing site mainly comprises impermeable surfaces. A Flood Risk Assessment and preliminary SuDS Report demonstrates the Applicant's commitments to succeed the greenfield runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) year events (which is above and beyond the policy requirement) and extensively use SUDS source control measures including permeable paving, ponds and green roofs over the Work-Live units, and rainwater harvesting. The Watercourses Team have confirmed that the proposed indicative SuDs proposals are acceptable at this stage and would require further drainage details at the reserved matters stage including how all the roof runoff and hardstanding will discharge via source control SuDS and removal of the impermeable liners on the permeable paving in order to allow partial infiltration. The final sustainable drainage strategy and a drainage verification would be secured via condition.
- 9.107. Thames Water has confirmed no objection considering the surface water network infrastructure capacity. The Watercourses Team have no objection to the proposal subject to a SUDS based on the final design and a drainage verification report. The requested information would be secured by way of condition in accordance with Policies SI 12, SI 13 of the London Plan (2021), Policy CP 28 of the Enfield Core Strategy (2010) and Policies DMD 59, DMD 61 and DMD 63 of the Development Management Document (2014).
- 9.108. With regard to foul water sewerage network capacity and water network and water treatment infrastructure capacity, Thames Water also confirmed no objection. An informative about the minimum water pressure will be attached to the decision notice as requested.
- 9.109. The proposed development would achieve green field runoff rates which is an improvement over the existing situation. Officers therefore place **limited weight** on the delivery of improvement in sustainable drainage.

Biodiversity, Trees and Landscaping

- 9.110. 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.

- 9.111. Policy G7 of the London Plan 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.

Designated Sites

- 9.112. A preliminary Ecological Appraisal (PEA) prepared by Greenlink Ecology Ltd has been submitted. The report assesses the impacts of the proposed on the designated sites including two non-statutory designated SINCS in close proximity. The report concludes that there would be no impact on the Crews Hill to Bowes Park Railsides SINC, which is located circa 100m to the south/west as it is inaccessible to the public. With regards to Hilly Fields Country Park SINC, the report concludes that a relatively small increase in visitors associated with the new homes is likely to have insignificant impacts.

Trees

- 9.113. The Tree Survey indicates 35 individual trees, 4 tree groups and 4 hedges on site. Of these trees, only 2 trees are 'category A' (high grade), 7 trees are 'category B' (moderate grade), 25 individual trees and 4 groups of trees are 'category C' (low grade) and 1 tree is 'Category U' (very low grade). All the hedges are 'category C' (low grade).

Table 6: Categories of the existing trees and tree loss

| | Existing | Loss |
|------------|--|--|
| Category A | 2 trees | None |
| Category B | 7 trees | None |
| Category C | 25 individual trees 4 groups of trees 4 hedges | 7 individual trees 1 tree group (consisting of 2 trees) 3 hedges |
| Category U | 1 | None |

- 9.114. 7 x low-quality category C trees, 1 x category C tree group (consisting of 2 trees) and 3 x category C hedges will be removed to facilitate the proposed development. To compensate for the loss of trees for the development and enhance the biodiversity and greenery, the Applicant is committed to provide a new urban tree habitat of 452m², native hedgerows of 541m long, and green roofs of 551m² as shown in the UGF calculator and biodiversity metric. The Applicant is committed to meeting the Urban Greening Factor (UGF) target of 0.4 as required by the London Plan Policy G4. A condition has therefore been attached to seek details of the landscape scheme and ensure the committed minimum areas of these key surface covers and the targeted UGF scores will be achieved.

- 9.115. The Tree Officer has confirmed no objection to the principle of development from an arboricultural perspective, according to the impacts identified within the arboricultural report produced by Tracy Clarke Tree Consultancy subject to a detailed tree protection scheme (Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP)) to minimise the impacts upon retained trees. A condition has therefore been recommended. An auditable schedule of arboricultural monitoring where works would need to be undertaken within Root Protection Areas will also be secured by a condition to ensure continued compliance with the agreed tree protection scheme throughout the development process. A S106 obligation is also recommended to secure the same

requirements to ensure the proposed pedestrian footway works to Strayfield Road would not have adverse impacts on the adjoining existing trees and hedgerows.

Habitats and Biodiversity Net Gain

- 9.116. The Site comprises a mixture of buildings along with extensive hard standing, some grassland, ruderal vegetation, miscellaneous planting, sections of hedgerows on the site's northern and eastern boundaries, along with short sections around the residential dwelling/offices, scattered trees and 6 artificial ponds.
- 9.117. The PEA survey establishes that the overall site is of low ecological value and that the habitat types are common/widespread and not of conservation concern. The proposals include the retention of trees, hedgerows and ponds along with the provision of a variety of new habitat types, including gardens, allotments, hedgerows, trees, a Sustainable Drainage System (SuDS) and green roofs. The Applicant has calculated the ecological values of the pre- and post-development site using Natural England Metric 3.1 methodology⁷. The biodiversity units will also increase from 0.11 units to 0.21 units, equivalent to a Biodiversity Net Gain (BNG) of 87.86% for habitat units and 828.67% for hedgerow units. The uplift would exceed the emerging statutory minimum BNG requirement of 10%. The Applicant will submit a Biodiversity Net Gain addendum to factor in the loss of verge due to the proposed Strayfield Road works (See also 'Traffic, Access, Parking' section) to ensure the same level of BNG gain would be attained within the application site. This would be secured through a condition. The Applicant is also committed to 30 years BNG monitoring in line with the emerging statutory requirement, which would be secured through a S106 Agreement.
- 9.118. This outline application is for access only with all other matters reserved. The site layout and landscape scheme will be subject to reserved matters applications. Based on the indicative layout, detailed landscaping plans and an Ecological Management Plan will also be secured by a landscaping condition to ensure the local biodiversity and the greenery would be enhanced in accordance with Policy DMD 81.

Protected Species

- 9.119. The submitted Preliminary Ecological Appraisal (PEA) Report indicates the Site has the potential to support the following protected/notable species:
- Some potential to support nesting birds;
 - Low potential to support roosting bats;
 - Limited potential for use by commuting / foraging bats
 - Low potential to support great crested newts
- 9.120. A single dusk emergence survey visit was subsequently undertaken by a qualified ecologist during the optimal seasonal period in May 2022 in accordance with Bat Surveys for Professional Ecologists Good Practice Guidelines (2016). In the absence of any bats recorded within the Application site, the Bat Report concludes that bats do not roost within the site. Very low numbers of Nathusius' pipistrelle (*Pipistrellus nathusii*) and noctule (*Nyctalus noctula*) bat calls were recorded which suggests bats were commuting/foraging in the wider area but not directly associated with the building. The Bat Report recommends every dwelling should install 1 no. wall-integrated bat (or bird) box at least 4-5 metres from ground level on different elevations and not

⁷ This application was validated in June 2022 before the new Metric 4 methodology was released.

illuminated by artificial lighting. The details of the bat /bird boxes and external lighting therefore would be secured through conditions.

- 9.121. No evidence of actively breeding birds was observed in the PEA survey. As the site contains some potentially suitable habitats for bird nesting throughout the site, the PEA recommends site clearance is undertaken outside of the active nesting period (March to August inclusive) unless a suitably qualified ecologist has confirmed the absence of active nests. This would be secured by a compliance condition. Box boxes (or bat boxes) will also be installed to enhance biodiversity (see also the above paragraph).
- 9.122. The PEA survey identifies the suitability of the three ponds in the north-west corner of the site for great crested newts as 'below average' based on the Habitat Suitability Index criteria. This has been further confirmed by no great crested newt DNA in the water samples obtained from these three ponds. The majority of the site contains hardstanding that is unsuitable for the species. The PEA concludes that great crested newts are absent from the site and immediate surrounding area.
- 9.123. Ponds 1 and 2 will be retained, and Pond 3 will be removed. As a precautionary approach, the PEA recommends the water from Pond 3 should be drained into the two other retained ponds and the marginal vegetation temporarily relocated into them in order to allow any wildlife the opportunity to disperse into a similar habitat. A condition has therefore been attached to ensure compliance.

Conclusion on Biodiversity, Trees and Landscaping

- 9.124. Considering the above, the proposed development would not result in any significant harm to the trees of high amenity values or the local wildlife and the designated sites including nearby Hilly Fields Country Park SINC. 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).
- 9.125. Overall, the proposed UGF score (0.4) just meets the London Plan target (0.4). The substantial increase in BNG (in percentage term) is skewed by the low baseline due to the existing site being dominated by hard standing. Nevertheless, the proposal would improve the local greenery and habitats from the existing achieving a BNG of 87.86% (area based) and 828.67% (linear based) exceeding the emerging statutory target of 10% with commitment to long term monitoring for 30 years. Officers therefore place **moderate weight** on the delivery of new greenery and biodiversity enhancements.

Traffic, Access, Parking

- 9.126. The site is located off the southern side of Strayfield Road, which is an unlit, unadopted bridleway. There are no footways or segregated cycle lanes along Strayfield Road. The carriageway in the vicinity of the site is subject to a 30pmh speed limit. There are no parking controls along Strayfield Road.
- 9.127. There are multiple Public Rights of Way (PROW) in the vicinity of the site. These include Bridleway 125 which runs along the site's frontage, Footpath 159 which is located circa 300m to the east of the site and Footpath 3 which connects the site frontage on Strayfield Road to Cattlegate Road. National Cycle Route 12 is also

located along the site frontage and provides cycle links to numerous destinations to the north and south of the site.

- 9.128. The site has a PTAL rating of 0. The nearest bus stops are located on Theobalds Park Road and served by the 456 bus route. Bus route 456 only provides a 20-30 minute service on weekdays, a half hourly service on Saturdays and approximately hourly service on Sundays. There are no bus stops in these locations as this section of the 456 bus route operates as 'hail and ride.' The Council has secured funding to introduce new fixed bus stops (both the northbound and southbound). It is also noted that there is no footway on the eastern side of Theobalds Park Road and the northern side of Clay Hill and no existing safe crossing facilities connecting Strayfield Road to the southbound bus stop. As part of the Council's bus stops improvement works, a new crossing will be provided to connect the southern side of Clay Hill with the new fixed southbound bus stop. Public consultation on the Council's bus stop improvement works was conducted in Jan 2023.

Vehicular Trip Generation

- 9.129. The assumed trip generation outlined in the Transport Assessment (TA) is based on TRICS analysis of trips generated by other comparable development sites. The TA anticipates that the proposed development will generate 34 two-way vehicle trips in the AM peak and 25 two-way vehicle trips in the PM peak. A daily total of 260 two-way vehicle trips is anticipated to be generated from the site as the worst case scenario. With the closure of the existing Anglo Aquatic plants, the associated existing HGV trips associated will be removed from the local roads. As a result, it is estimated there would be a net increase of 234 daily vehicular trips in winter and 158 daily vehicular trips in spring/summer with a reduction in large HGVs travelling on Strayfield Road.
- 9.130. The Transportation Team confirmed that Strayfield Road is a lightly trafficked road and the Strayfield Road arm of Strayfield Road/Clay Hill/Theobalds Park Road/Flash Lane junction, which vehicles travelling to and from the site will use, benefits from sufficient visibility. Officers therefore are satisfied that the predicted increase in vehicle movements associated with the development can be accommodated on this junction and would not have a material impact on the local highway network.
- 9.131. It is noted that there is a separate live planning application for extensions of Headstart Nursery to increase the number of pupils from 55 to 195 (ref: 22/00679/FUL). At the time of writing this report, the planning application for Headstart Nursery is still under consideration. In any event, each application should be assessed based on its own merits including any mitigation measures. Hence, the Headstart Nursery application does not change the assessment of this application.

Vehicular Access

- 9.132. The site benefits from two existing vehicle accesses off Strayfield Road. The site can also be accessed via a shared access road with No.36 Strayfield Road and a stud farm to the north-west of the site.
- 9.133. The existing eastern access will be modified to create a new priority access junction to serve as the main access to the new development. The submitted swept path analysis in the Transport Assessment demonstrates that visibility of 2.4m x 43m are achievable from the site access. The plans also show that the new access will be 5.5m wide with

a 6.0m radii and 2.0m footways either side of the access. During the course of this application, the Applicant has also provided a revised swept path analysis to demonstrate the Council's refuse vehicles can safely enter and exit the site in forward gear. The Transportation Team has confirmed that the proposed access arrangement is acceptable while maintaining an acceptable pedestrian access.

- 9.134. This application is an outline application for access only. The design of the internal roads will be assessed at the reserved matters stage to ensure separate footways would be provided and the larger refuse vehicles would be tracked.

Pedestrian , Cyclist and Equestrian Access

- 9.135. Strayfield Road is a bridleway which is currently used by pedestrians, cyclists, equestrians and drivers without physical segregation on the road. The TA estimates that the total person trip rates from the proposed new homes and Live Work Units are 97 trips in the AM peak and 78 trips in the PM peak with a daily total of 739 two-way trips. To accommodate the increase in pedestrian and cyclist trips generated from the proposed development, it is proposed to provide a segregated pedestrian footway on Strayfield Road from the site entrance to the Strayfield Road/Theobalds Park Road/Clay Hill/Flash Lane junction. Following the comments from the Transportation Team and local residents, the Applicant has revised the design of the proposed pedestrian route. A 2m wide footway will be provided along the site frontage within the application site and the majority of the remaining footway will have a clear width of 1.5m except the last section near the Clay Hill/Strayfield junction and a few locations where there is an obstacle such as utility poles and equipment. The proposals would be broadly in line with Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (2021). The new footway will then join up with the existing public adopted footway on Clay Hill and Theobald Parks Road. Bollard lighting will be provided on the southern side of the proposed footway. New crossing between the two sides of Strayfield Road is also proposed at the eastern end.
- 9.136. Following the comments received during public consultation, the Applicant has amended the design of the pedestrian route works which clearly shows that the existing vehicular accesses to the adjoining properties on Strayfield Road would be retained with dropped crossings at all the existing vehicular accesses. The proposal therefore would not unreasonably hinder the use of the existing vehicular accesses of adjoining properties including 2 Strayfield Road, the North East Enfield Cricket Club and Strayfield Road Cemetery.

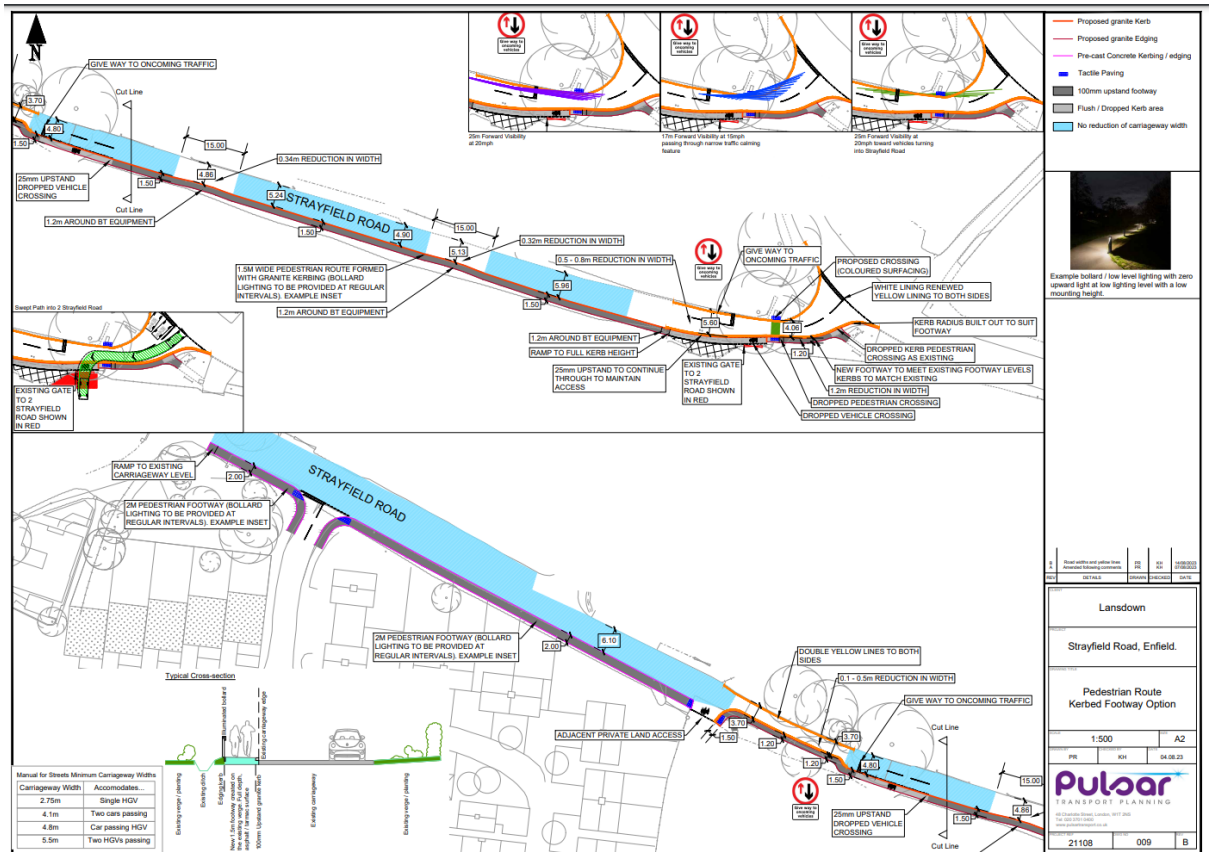


Figure 1. Proposed pedestrian route work on Strayfield Road

9.137. With regard to the potential impacts of the proposed works on vehicular traffic on Strayfield Road, the majority of the proposed pedestrian footway will be within the existing verge on the southern edge of the Strayfield Road carriageway. Therefore, for the majority of its length, Strayfield Road would have the same carriageway width as it does currently (See the areas highlighted in blue in Figure 1 above). There are a couple of minor reductions in width where the path avoids existing utility boxes, utility poles and trees. The swept analysis has demonstrated that refuse vehicles could pass these sections. The overall retained width of the carriageway in these localised points is similar to other existing parts of Strayfield Road. Following the comments from LFB, LBE Building Control Team and the local residents, the Applicant has also revised the design and increased the effective width of the whole carriageway to at least 3.7m.

9.138. With regard to the concerns over potential parking on Strayfield Road and the resultant obstruction to traffic raised during public consultation, officers have visited the site on a Thursday afternoon during school drop-off and a Sunday morning. While cars park on the eastern section of Strayfield Road at certain periods of the day, such as during school drop off and pick up and events hosted by the nearby church or cricket club, these cars tend to dissipate afterwards. It is not common that these occasions would happen at the same time. For example, based on the comments from the North Enfield Cricket Club received during public consultation, there are usually matches and practice sessions from late afternoon through the evening every week from mid-April to late July. This is beyond normal school pick up times. These occasions are also normally outside the AM peak and PM peak of the vehicular trips generated from the proposed development. As mentioned in the above, only a number of small sections of the carriageway would be reduced in width and large vehicles would still be available to pass through. It is highly unlikely that any rational driver would deliberately park on both sides of Strayfield Road nor at the pinch points to obstruct traffic flow on Strayfield Road. Double yellow lines while not enforceable are also included at the two narrowest

points at the Clay Hill / Strayfield Road junction and near the access to the Cemetery as a visual deterrence.

- 9.139. Secondly, Strayfield Road is relatively long, and there would still be numerous opportunities for drivers to park further into Strayfield Road where parking would not block other incoming and outgoing vehicles.
- 9.140. Thirdly, at the reserved matters stage, sufficient car parking spaces will be secured within the application site. Hence, the proposed development would not create any demand for additional on-street parking on Strayfield Road.
- 9.141. Considering the above, it is therefore considered that the proposed development including the proposed works to Strayfield Road, would not make a material difference on the on-street parking on Strayfield Road and would not have an adverse impacts on the traffic flows on Strayfield Road.
- 9.142. The final design of the proposed Strayfield Road works including a road drainage proposals together with Road Safety Audits at design, post-construction and post-opening monitoring stages will be secured through a S106 agreement (See also 'Built Heritage and Archaeology' section). The Applicant has confirmed that they have the legal rights to undertake the works on the unregistered unadopted bridleway and is committed to complete the proposed work on Strayfield Road prior to the first occupation of the new development. These would be secured through a s106 agreement.
- 9.143. The Applicant has also committed to a long term management and maintenance of the proposed footways, bollard lighting, signage installation and road drainage. A S106 obligation is recommended to seek the details of the management and maintenance plan.
- 9.144. With regard to the suggestion for a financial contribution by the British Horse Society to install physical speed restrictions along Strayfield Road to prevent speed in excess of 20mph being achievable, it is considered not necessary as the proposed development would not have a significant impact on the safety of the users of Strayfield Road including equestrians as demonstrated in the above section.
- 9.145. It is therefore considered that on balance the proposed works to Strayfield Road would be acceptable and would provide a safe pedestrian route for the existing users and the future occupiers of the development given the site constraints. Also, the proposed works would not result in detrimental impacts on the users of existing accesses to the existing properties and Strayfield Road including drivers, pedestrians, cyclists and equestrians.

Parking

- 9.146. Since this outline application is for access only with all other matters reserved, the parking provision will be assessed in detail at the reserved matters stage. The proposed parking provision would be required to comply with the maximum car parking standards stated in the London Plan (2021) whilst resulting in no detrimental overspill parking in the area. The Applicant is committed to meet the London Plan standards in regard to electric charging and disabled bay provision. An on-site car club bay will also be provided. These provisions would be secured through conditions.

Cycle Parking

- 9.147. The Applicant is committed to provide a total of 126 long stay bicycle parking spaces and 3 short stay spaces for the proposed new dwellings and live-work units. With regard to the offices, 3 long-stay cycle parking spaces and 1 short-stay cycle parking will be provided. The provision will meet the London Plan minimum requirements. A condition has been attached requesting that final details demonstrating that all the bike parking is fully accessible and secured is provided, and to ensure that the bike store is provided prior to first occupation in accordance with DMD Policy 45, Policy T6.1 of The London Plan (2021) and TfL London Cycle Design Standards (2014).

Sustainable Travel

- 9.148. As noted above, there is a bus route 456 accessible within a five-minute walk of the site (the route from the site to the bus stops through Strayfield Road will be improved as stated in the 'Pedestrian, Cyclist and Equestrian Access'). This bus route connects the Site with local areas including Enfield Town which is approximately 15 minutes by bus from the site. The challenges of site connectivity are acknowledged.
- 9.149. The Applicant initially suggested to deliver bus stop improvements at the two nearest stops on Clay Hill/ Theobalds Park Road to replace the 'hail and ride' stops. The Transportation Team have confirmed that the Council has already secured funding to improve the existing bus stops. Upon the Transportation Team's request, the Applicant has agreed to a financial contribution of £68,024 to improve the walking and cycling infrastructures in the locality in order to improve key routes to amenities.
- 9.150. To promote sustainable mode of transport, the Applicant is also committed to providing a Travel Plan and its monitoring, 2 years' car club membership, car club credits and vouchers for oyster cards for each household (including Live-Work units). These commitments would be secured through a S106 agreement.

Servicing and Refuse

- 9.151. Upon the request from the Transport Team, the Applicant has provided a revised swept analysis using the size of Council's refuse vehicles. The submitted swept path analysis has demonstrated that refuse vehicles can egress and ingress the site through Strayfield Road even if cars are parked on one side of Strayfield Road. The Transportation Team has confirmed that a larger access into the site is not required as it would be the main route for pedestrians, and minimising the junction radii would help pedestrians to navigate. The internal road layout will be subject to reserved matters applications. A delivery and servicing plan for all the proposed uses (residential, live-work units and offices) will be secured through a condition.

Construction Traffic Management

- 9.152. The bridleway status of Strayfield Road and the concerns raised are noted. A detailed Construction and Logistic Management Plan will be submitted to ensure that the construction traffic from the new development including the proposed pedestrian route work on Strayfield Road would minimise the impacts on local highways and different users of Strayfield Road. A condition and S106 obligation have therefore been recommended.

Conclusion on Traffic, Access and Parking

- 9.153. Overall, the existing challenges of poor site connectivity are acknowledged. It has been demonstrated that the proposed vehicular trip generations would not result in conditions prejudicial to the safety and free flow of traffic in the surrounding area. The proposed pedestrian route works to Strayfield Road and the commitment to Travel Plan and its monitoring would mitigate the estimated increase in pedestrians and public transport trips generated from the proposed development subject to the conditions and obligations mentioned above. Officers consider the impacts on the highway safety would not be detrimental to the degree that would warrant a reason for refusal. Furthermore, a financial contribution towards improving walking and cycling infrastructure in the locality would mitigate the impacts of the development while also benefitting the wider communities through increasing the connectivity of Crews Hill in general. Officers therefore consider **limited weight** be placed on the active travel contribution.

Sustainable Design and Construction

Operational carbon emissions

- 9.154. This outline application seeks approval for access only with all other matters reserved. Nevertheless, the Applicant has submitted an Energy and Sustainability Statement to illustrate the indicative proposed energy strategy and resultant operational carbon emissions performance for the proposed residential development and Live-Work units based on the indicative layout and building typologies. The proposed office refurbishment does not qualify as a major refurbishment (i.e. 1,000 sqm+). Hence, an energy assessment on the proposed refurbishment of the office building is not required. The final energy strategy and operational carbon emissions reduction will be established based on the final design at the reserved matters stage.
- 9.155. At the 'Be lean' stage, the Applicant has committed to achieving no less than a 12% reduction over Part L (2021) through demand reduction measures including thermally efficient fabric, high-performance glazing, reduced air permeability and wastewater heat recovery slightly exceeding the minimum operational carbon emissions reduction target (10%) as stated in Policy SI 2 of the London Plan. However, it is noted that the proposed Space Heating Demand and Energy Use Intensity are higher than the benchmarks stated in the GLA Energy Guidance which is because a lower efficiency of the air source heat pump is assumed at this stage as the worst case scenario. The final energy strategy and details would be secured through a condition.
- 9.156. Energetik has confirmed that the site is currently beyond the planned routes of the District Heat Network. An Air Source Heat Pump (ASHP) is proposed, preventing the need for any gas connections to the scheme. The Applicant has agreed to ensuring the detailed design of the proposal is future-proofed to connect to a future heat network, including safeguarded pipe routes and suitable heating plant room locations. This would be secured by S106 agreement.
- 9.157. At the 'Be Green Stage', the Applicant has committed to a PV output of at least 151.2 kWp and air source heat pump technology, which would result in an overall 79% reduction. This would meet the minimum operational carbon emissions reduction targets (35%) as stated in Policy SI 2 of the London Plan.
- 9.158. The final Energy Strategy and all the details of the wastewater heat recovery system, PV panels and air source heat pumps will be secured through conditions based on the final design of the development at the reserved matters stage. The conditions will also ensure measures are provided prior to first occupation.

- 9.159. 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 with the revised Energy Statement via a condition. The Applicant has also committed to a 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.
- 9.160. The Applicant is also committed to a financial contribution to offset the shortfall of the residual operational carbon emissions against the net zero carbon target based on the final energy strategy. This will be secured by a S106 obligation.
- 9.161. 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

- 9.162. The submitted Energy and Sustainability Statement is committed to using passive cooling measures and ruling out mechanical ventilation or air conditioning in accordance with the broad principles of the cooling hierarchy required by London Plan Policy SI4. The Applicant is also committed to carry out a dynamic model in accordance with TM59 and the Approved Document O Part 2b will be carried out and submitted at the detailed planning stage. The overheating assessment and details of overheating reduction measures will be secured through condition.

Whole Life Carbon Assessment

- 9.163. This Application is an outline application for access only with all other matters reserved. Hence, limited information can be provided at this stage given the design and layout are not part of this application. The existing office building will be retained. Given the siting of the existing dwellinghouse and warehouse facilities and the low head height and structural bearing of the existing glasshouses, it is not feasible to retain the existing buildings and structures for residential buildings. Although a Whole Life Carbon Assessment has not been provided at this stage, officers are satisfied that the options have been fully explored before considering substantial demolition in accordance with GLA Whole Life Carbon Assessment LPG (2023) at this stage.
- 9.164. The Applicant has committed to provide a full WLC assessment at the reserved matters stage as they progress the final design. This would be secured through a condition. The condition will also request for a post construction monitoring report to ensure the compliance of the WLC reduction actions.

Circular Economy

- 9.165. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG (2022).
- 9.166. Following the GLA Stage I referral, the Applicant has submitted a Circular Economy Statement which sets out some high-level strategies. It has not been demonstrated satisfactorily that the development would fully comply with LP Policy D3. However, this outline application is for access only with all other matters reserved. Hence, limited information can be provided at this stage. Officers are satisfied that compliance to

circular economy policy can be addressed through a condition to secure a revised Circular Economy Statement together with the GLA CE template and supporting evidence including pre-demolition development audit, pre-demolition audit, bill of materials, outline Construction Site Waste Management Plan and Operational Waste Strategy. The use of the Enfield Excess Materials Exchange platform will also be conditioned to maximise re-use of the existing materials as requested by the Climate Change and Sustainability Team. . Furthermore, a condition will be attached to request a postconstruction report to ensure delivery of all the proposed waste minimisation measures.

Water consumption

- 9.167. Policy SI5 of the London Plan (2021) requires that residential development be designed so that mains water consumption would meet a target of 105 litres or less per head per day, excluding an allowance of 5 litres per head for external water use. The Energy and Sustainability Statement shows the Applicant's commitment to meet the London Plan target through incorporating water-saving measures and equipment and installing water butts to reduce the usage of portable water for exterior use. A condition therefore has been attached to ensure compliance.
- 9.168. To reduce the water demand within the refurbished office, the Applicant is also committed to water-consuming fittings to reduce water demand by at least a 12.5% over the design baseline standard defined by BREEAM Wat 01. However, it is expected the proposal would target a 65% improvement in water efficiency over notional baseline for the 'Wat 01' water category through water efficient sanitaryware specification in order to comply with the Policy 58 of DMD (2014) and SI 5 of London Plan (2021). This would be secured through the condition for a pre-design BREEAM statement (see also BREEAM section below).

BREEAM

- 9.169. Policy 50 of DMD (2014) recommends a BREEAM target of 85% to achieve 'Outstanding' rating. The submitted Circular Economy Statement indicates a commitment to BREEAM excellent rating for the refurbished office building and Live-Work units. No design stage BREEAM pre-assessment has been submitted. A condition has therefore been attached to seek design stage and post-construction assessments to demonstrate how the refurbished building would aim at achieving an 'outstanding' rating and at least meet the 'Excellent' rating, a minimum of 3 out of 7 credits under MAT 1 (life cycle impact assessment) and a minimum of 2 out of 3 credits under MAT 3 (Responsible sourcing of materials) as required by Policy 57 of DMD (2014).

Conclusion on Sustainable Design and Construction

- 9.170. Considering the above, the proposed development would meet the policy requirements in terms of sustainable design and construction subject to additional information at the reserved matters stage. The proposed development would contribute to an increase in modern offices stock and energy efficient affordable housing stock, which would help reduce ongoing energy costs and alleviate fuel poverty in the borough. Officers have considered the benefits in the 'Housing Need and Mix' and 'Economic considerations' sections.

Fire Safety

- 9.171. Following public consultation and the GLA Stage I referral, A Fire Statement Assessment prepared by a fire professional who has suitable qualifications and demonstrable experience has been submitted. Following the consultation responses from the public and London Fire Brigade, the design of proposed pedestrian route works to Strayfield Road have been revised to ensure the whole stretch of carriageway of Strayfield Road would have a minimum width of 3.7m as stated in the ADB B5 which addressed the comments from the London Fire Brigade.
- 9.172. Given this outline application is for access only with all matters reserved, a condition has been attached to seek a Fire Statement addendum at the reserved matters stage . Having regard to the above, it is considered that the proposed fire safety arrangements are acceptable at the outline planning application stage subject to the aforementioned condition. Officers considered this is a **neutral factor** which weighs neither in favour nor against the proposed development.

Air Quality

- 9.173. 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 phase

- 9.174. Following public consultation and the GLA Stage I referral, the Applicant has submitted an Air Quality Assessment which assesses the dust impacts of the construction activities on the sensitive receptors. Subject to dust control measures during the various stages of redevelopment of the site in accordance with GLA The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance (2014), the residual dust impact is considered not significant. 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 and the final Construction Logistics Management Plan. The requested information will be secured by condition.

Operational phase

- 9.175. Concentrations of NO₂, PM₁₀ and PM_{2.5} have been predicted at worst-case locations representing existing properties adjacent to the road network under the worse-case scenario with the use of 2025 traffic data and 2019 emission factors. The predicted concentrations are below the relevant objectives at all the existing receptor locations with the proposed development in place. The impact is therefore considered not significant.
- 9.176. Dispersion modelling was also undertaken to quantify air quality conditions at the application site to confirm whether the site is suitable for residential use. Based on the assessment results, the site has been classified as Air Pollution Exposure Criteria (APEC) - A, which means no air quality mitigation measures are required for occupiers of the new homes in accordance with the London Councils Air Quality and Planning Guidance (2007). The Environmental Health Officer has no objection to the new development from an air quality perspective.

Air Quality Neutrality

- 9.177. Electricity will be used to provide heating and hot water for the development. The proposal is considered air quality neutral from a building emissions perspective. Whilst the proposed scheme based on the estimated trip generation 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 the impacts (See also 'Healthy Street' section). 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).

Conclusion on Air Quality

- 9.178. For the reasons outlined above, officers considered this is a **neutral** factor which weighs neither in favour nor against the proposed development.

Land Contamination

- 9.179. The submitted Phase One Contamination and Geotechnical Assessment (desk study report) concludes gross contamination is unlikely to be on-site and recommends an intrusive investigation prior to commencement. 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. Officers therefore consider land contamination is a **neutral factor** which weighs neither in favour nor against the proposed development.

Digital Connectivity

- 9.180. Based on the data from Openreach, standard broadband and Superfast Fibre Broadband services are currently available for the site and the surrounding properties. The Applicant has committed to provide superfast broadband for the Live-Work units. A planning condition is also recommended requiring the submission of detailed plans demonstrating the provision of sufficient ducting space to future proof any full fibre connectivity infrastructure within the development in line with London Plan Policy SI6. Once the Applicant has further engagement with the network operators, the Applicant will submit evidence to demonstrate the development would not have detrimental impacts on the digital connectivity of neighbouring buildings in accordance with London Plan Policy SI 6. Officers therefore consider digital connectivity is a **neutral factor** which weighs neither in favour nor against the proposed development.

Planning Balance

- 9.181. Paragraph 148 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 9.182. What is considered to constitute Very Special Circumstances (VSC) depends on the weight of each of the factors put forward, the degree of weight accorded to each is a matter for the decision taker. In the case of *R (Wildie) v Wakefield Metropolitan BC [2013] EWHC 2769 (Admin)*, Stephen M states '*in order to qualify as "very special", circumstances do not have to be other than "commonplace" i.e., they do not have to be rarely occurring*'. In the case of *R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin)*, Ouseley J states "*Once the issue is whether or not inappropriate development should be permitted in the Green Belt, all factors which tell in favour of the grant go to making up very special circumstances, which may or may not suffice. It is not necessary to go through the process of considering whether a factor is not a very special circumstance but nonetheless falls to be taken into account in favour of the development as another*

relevant material consideration. See *Secretary of State for Communities and Local Government v Redhill Aerodrome Ltd [2014] EWCA Civ 1386.* [68].

- 9.183. The proposals would cause definitional harm to the Green Belt by reason of inappropriateness, significant harm to openness and the harm to the purposes of the Green Belt. The first two harms identified attract **substantial** weight and the latter harm identified attracts **moderate** weight. The loss of agricultural land attracts **limited** weight. However, Enfield has acute housing delivery shortages particularly family homes and acute affordable housing need. The proposals would make a significant contribution towards addressing these needs in the form affordable family homes. Officers have attached **substantial** weight to the provision of energy-efficient, affordable homes, particularly family homes. Officers have also attached **moderate weight** to the provision of community allotments and on-site biodiversity net gain together with improvements in greenery. Furthermore, officers have attached **limited weight** to the financial contribution to the walking and cycling infrastructure in the area, the delivery of additional employment floorspace and employment opportunities, and the improvement in sustainable drainage. These factors, when considered collectively demonstrate that very special circumstances do exist.
- 9.184. Officers consider the proposed pedestrian routes to Strayfield Road, contributions towards education and health facilities would mitigate the impacts of the proposed development that support the delivery of new homes. Subject to the conditions and S106 obligations, the proposed development would have a neutral impact on heritage, neighbouring amenities, quality of accommodation, air quality, fire safety and land contamination.
- 9.185. Officers therefore consider that the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations in accordance with paragraph 144 of the National Planning Policy Framework 2021. Looking at the application as a whole, very special circumstances do exist to justify inappropriate development in the Green Belt. As a result, officers therefore conclude that the proposals would comply with both the National Policy Framework 2021 and the development plans taken as a whole. For the reasons given above, and having considered all other matters raised, this application is recommended for grant subject to conditions and a S106 agreement.

Community Infrastructure Levy (CIL)

Mayoral CIL

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

Enfield CIL

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

S106 Heads of Terms

9.189. The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within a Section 106 Agreement

| Heads of Term | Description | Sum |
|--------------------------------|--|------------|
| Education | <ul style="list-style-type: none"> Contribution towards provision of education facilities | £159,705 |
| Healthcare | <ul style="list-style-type: none"> Contribution towards upgrading the existing floorspace in Chase Farm Hospital to increase the acute health and mental health service provision. | £94,795 |
| Playspace | <ul style="list-style-type: none"> Provision of at least 595 sqm on-site playspace | N/A |
| Community allotments | <ul style="list-style-type: none"> Provision of at least 764 sqm open to residents of the proposed development and the surrounding areas Submission and implementation marketing strategy and monitoring to promote the community allotments The community allotments will be managed by a non-profit making organisation. Financial contribution of £10,000 to the local management group for general support Financial contribution of £5,000 to the local management group for procuring greenhouses or other facilities Submission and implementation of Management and maintenance plan | N/A |
| Strayfield Road works | <ul style="list-style-type: none"> Undertaking Road Safety Audits Submission and implementation of the final design of the proposed Strayfield Road works including road drainage, an Arboricultural Impact Assessment, a Tree Method Statement, a Construction and Logistics Management Plan. Responsible for the long term management and maintenance of the footway, bollard lighting, installation, and road drainage. Submission and implementation of the detailed management and maintenance plan. | N/A |
| Travel plan | <ul style="list-style-type: none"> Submission and implementation of residential travel plan for approval. Discount vouchers for oyster card for £50 per bedroom (including Live-Work units) Submission of travel plan monitoring reports and associated monitoring fee | £5,500 |
| Car club | <ul style="list-style-type: none"> Provision of on-site parking for car club use 2 years car club membership and £50 credit for each household for the first occupiers (including Live-Work units) | N/A |
| Active travel | Contribution towards walking and cycling improvement works in the area | £68,024 |
| Employment and skills strategy | <ul style="list-style-type: none"> Submission and implementation of employment and skill strategy | N/A |
| Live-work units | <ul style="list-style-type: none"> Provision of at least 455 sqm employment floorspaces within the Live-work units. The occupancy of the living area will be restricted to a person and their households working full time in the business. | N/A |

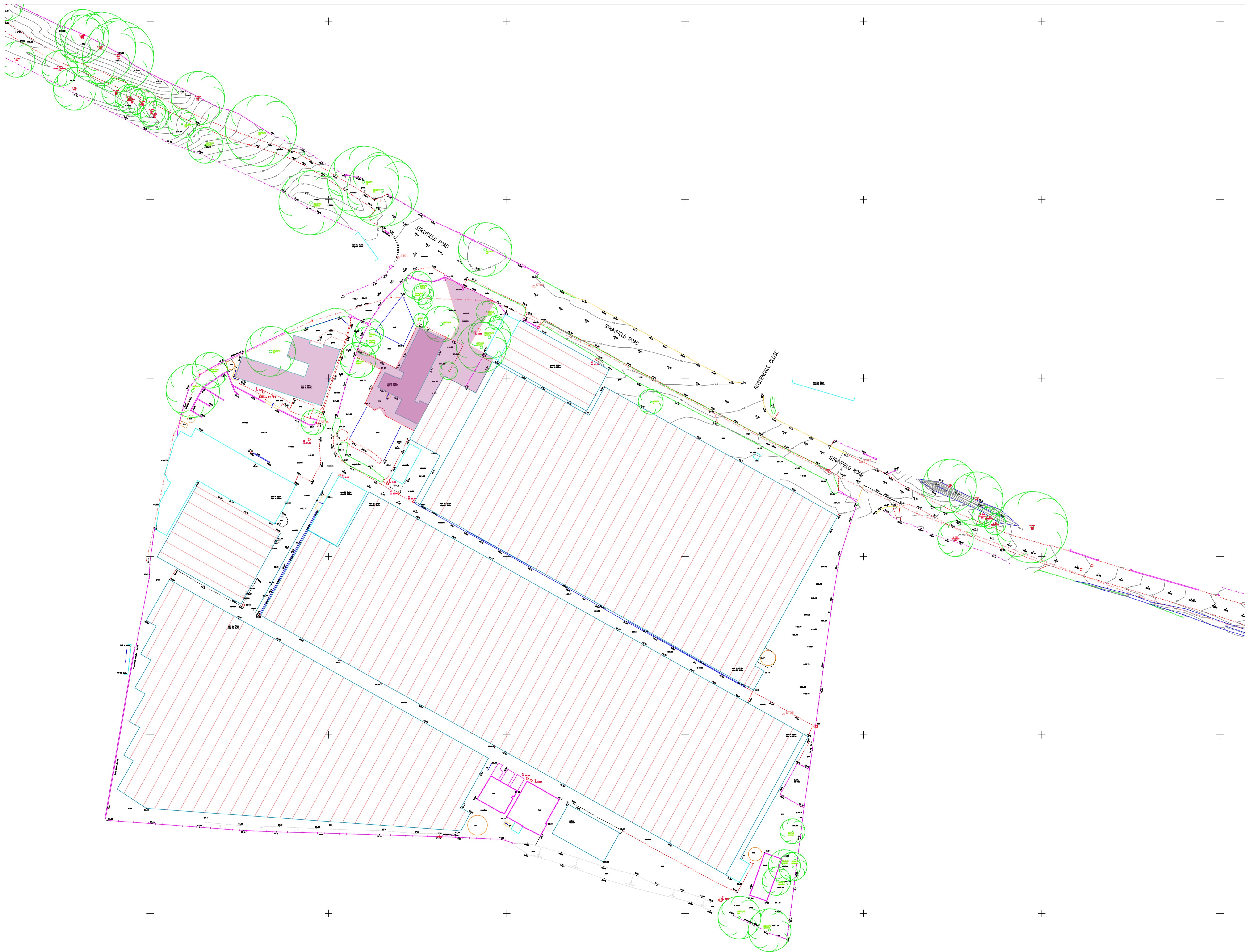
| | | |
|---------------------------------|---|--|
| District Heat Network | <ul style="list-style-type: none"> Provision and safeguarding the connection pipe route | N/A |
| Carbon offset fund | <ul style="list-style-type: none"> Contribution towards carbon emissions reduction projects in the borough to offset the shortfall in the achieved on-site carbon emissions reduction against net zero based on the final energy strategy to be submitted under condition 27 | To be confirmed at the reserved matters stage. |
| Be-seen monitoring | <ul style="list-style-type: none"> Submission of the energy performance data | N/A |
| Affordable housing | <ul style="list-style-type: none"> Residential (C3) dwellings to be provided as 100% affordable housing (excluding live-work units) with the following size and tenure mix: <ul style="list-style-type: none"> 50% social rent, 40% shared ownership, 10% London Living Rent 69% 3-bedroom homes, 31% 2-bedroom homes Affordable housing to be provided by a Registered Provider At least 10% of the dwellings to meet Building Regulation requirement M4(3) and equally split between social rent and intermediate housing. Meeting the GLA eligibility requirements Submission and implementation of a nomination agreement Early viability review | N/A |
| Biodiversity | <ul style="list-style-type: none"> Delivery of the BNG and 30 years monitoring and associated monitoring fee | £8,250 |
| Design Review Panel | <ul style="list-style-type: none"> Attending the Enfield Design Review Panel prior to submission of each reserved matters application | N/A |
| Retention of architect | <ul style="list-style-type: none"> Design monitoring fees in the events of changes in project architect | N/A |
| Considerate construction scheme | <ul style="list-style-type: none"> Register the development with Considerate Constructor's scheme and subsequent assessment from a representative of the Considerate Construction Scheme | N/A |
| S106 monitoring fee | As per the Enfield S106 SPD. | |

10. Public Sector Equality Duty

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

11. Conclusion

- 11.1. The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF states that planning permission should be granted unless "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed".
- 11.2. Whilst the proposed development is inappropriate development with the Green Belt and would result in harm to the Green Belt, it is considered that 'Very special circumstances' exist. As demonstrated in the 'Planning Balance' section, the harm to the Green Belt and the loss of agricultural land are clearly outweighed by the benefits of the scheme.
- 11.3. This 100% affordable homes scheme would deliver 58 low carbon affordable homes including 50% social rented homes and 50% family homes, which would contribute to the affordable housing delivery in the borough especially given the substantial shortfall in 5 years housing land supply (3.8 years), under delivery of housing supply in the last three years (meeting 73% of the housing targets), and the long term under-delivery of affordable homes.
- 11.4. The proposed development would also provide community allotments which would benefit the wider communities, The financial contributions towards improving the existing school and health facilities would mitigate the additional demands from the development.
- 11.5. Biodiversity net gain of 87.86% (area based) and 828.67% (linear based) would be achieved whilst existing trees and wildlife species in the application site and the nearby Hilly Fields Country Park SINC would not be harmed. On-site sustainable drainage would be improved with greenfield runoff rate.
- 11.6. Whilst the challenges of site connectivity are acknowledged, the Applicant has committed to a financial contribution to improve the walking and cycling infrastructure in the local area which would benefit the wider communities. The proposed development would not result in any adverse impacts on safety of pedestrians, cyclists, equestrians and drivers nor the traffic flow in the area. The proposed work to Strayfield Road would provide a safer pedestrian route which would help promote sustainable modes of travel for the occupiers of the development.
- 11.7. The recommended conditions and obligations would ensure the proposed development would preserve the setting of the Clay Hill Conservation Area, provide safe and well-designed accommodation to the future occupiers and result in no unreasonable impacts on the residential amenities of the neighbouring properties. These aspects would be assessed in more detail at reserved matters stage.
- 11.8. On balance, taking account of the national Green Belt policies and the presumption in favour and the weight to be given to development, it is concluded that the development for the reasons set out within this report, has demonstrated 'Very Special Circumstances' and accords with the policies of the NPPF and 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.



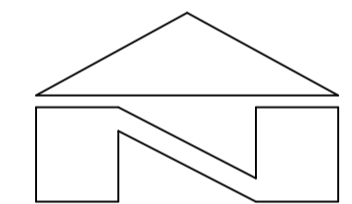
LEGEND

| | | |
|-----------------|-----------------------------|-------------------------|
| Kerb Drop kerb | AP Anchor Point | LP Lamp Post |
| Overhead/canopy | AV Air Valve | LPS Lamp Post Short |
| Building | BH Borehole | MH Manhole |
| Surface Change | BL Bollard | MK Service Marker Post |
| FENCES | BT British Telecom cover | OBF Open Board Fence |
| Chain Link | BWF Barbed Wire Fence | PM Parking Meter |
| Board | CATV Cable Television Cover | PRF Post and Rail Fence |
| Wooden rail | CTV Cable Television Point | PWF Post and Wire Fence |
| Wire | CBF Close Board Fence | RE Rodding Eye |
| Security | CLF Chainlink Fence | RS Road Sign |
| Iron Rolling | CPS Concrete paving slabs | SC Stop Cock |
| | CN Column | SV Stucco Valve |
| | DP Downpipe | TCB Telephone Call Box |
| | DPC Damp Proof Course | TPAV Tactile Paving |
| | EC Electricity Cover | TKT Ticket Machine |
| | EP Electricity Pole | TP Telephone Pole |
| | FFL Finished Floor Level | TS Traffic Signal |
| | FH Fire Hydrant | UL Soffit/upper level |
| | FP Fence Post | UTL Unable to lift |
| | GP Gate Post | VP Vent Pipe |
| | G Gully | WO Wash Out |
| | KO Kerb Outlet | WM Water Meter |
| | LB Letter Box | WMF Wire Mesh Fence |

NOTE. The Survey has been oriented to the O.S. National Grid (OSGB36) via a Global Position System and the O.S. Active Network (OS Net) OSGB36(15). True OSGB36(15) coordinates have been established at a point near the site centre and a further OSGB36(15) point established to create a true O.S. bearing for angle orientation. All levels are based on O.S. Datum. No scale factor has been applied to the survey and thus the Coordinate System is Arbitrary and not a true O.S. Coordinate System which would require scale factors to be applied to all distances. The Survey Station Table should be used to establish any on-site coordinates.

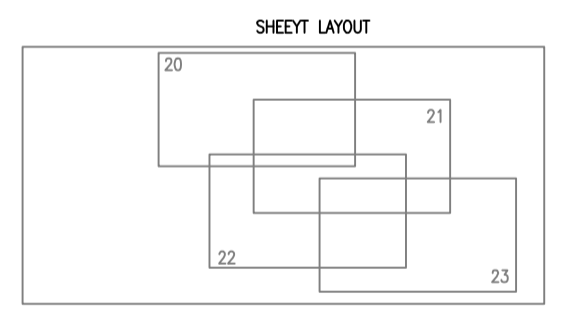
- NOTE.
1. This is a topographic survey and as such the physical features shown are not necessarily legal boundaries.
 2. Drainage information is by surface inspection only and cannot be guaranteed.
 3. This survey has been carried out at an accuracy commensurate with the scale shown on the title block of this drawing. Enlarging the drawing by digital means will not increase the accuracy of the survey.

Tree Information
 400/7/8 bole dia.(mm)/spread(m)/height(m)
 Tree species should be checked by an expert if identification is critical.
 Trees show average spread unless otherwise shown.
 Tree heights are by visual estimation and are not measured



SURVEY STATIONS

| Station | Easting | Northing | Level | Type |
|---------|-----------|-----------|-------|------|
| ST01 | 531519.59 | 189983.85 | 62.14 | Nail |
| ST02 | 531527.61 | 189975.30 | 62.21 | Nail |
| ST03 | 531449.30 | 189926.52 | 60.89 | Nail |
| ST04 | 531407.24 | 189937.27 | 61.44 | Nail |
| ST05 | 531402.13 | 189923.17 | 61.18 | Nail |
| ST06 | 531427.65 | 189955.79 | 59.32 | Nail |



| Revision | Suff | App | Date |
|----------|------|-----|------|
| | | | |



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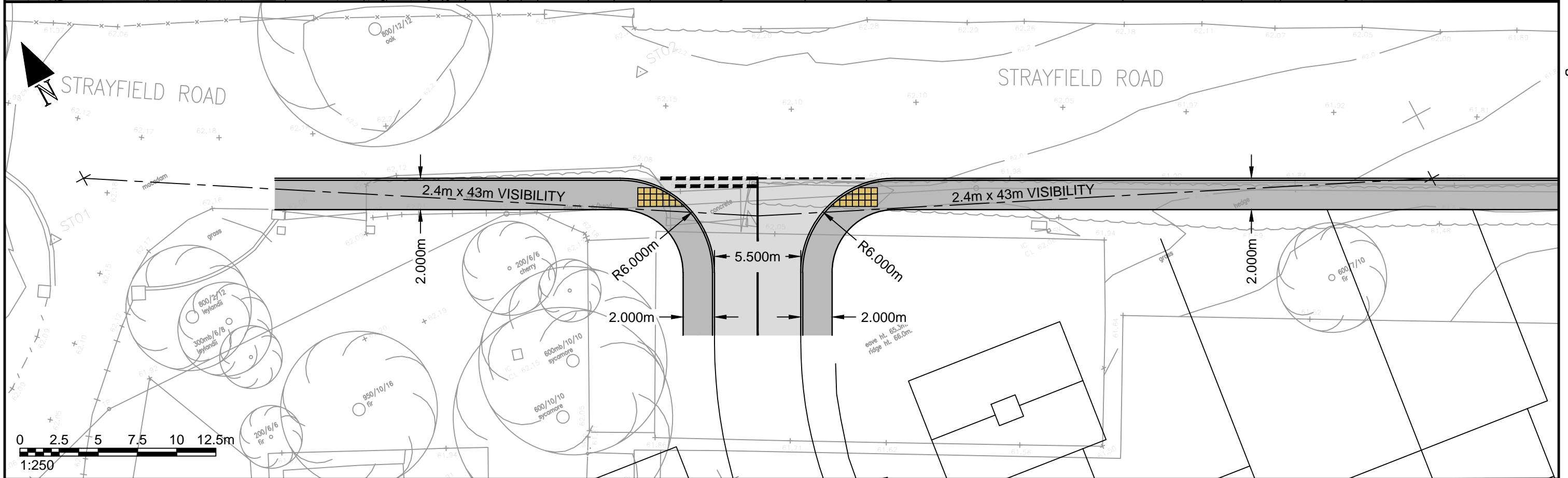
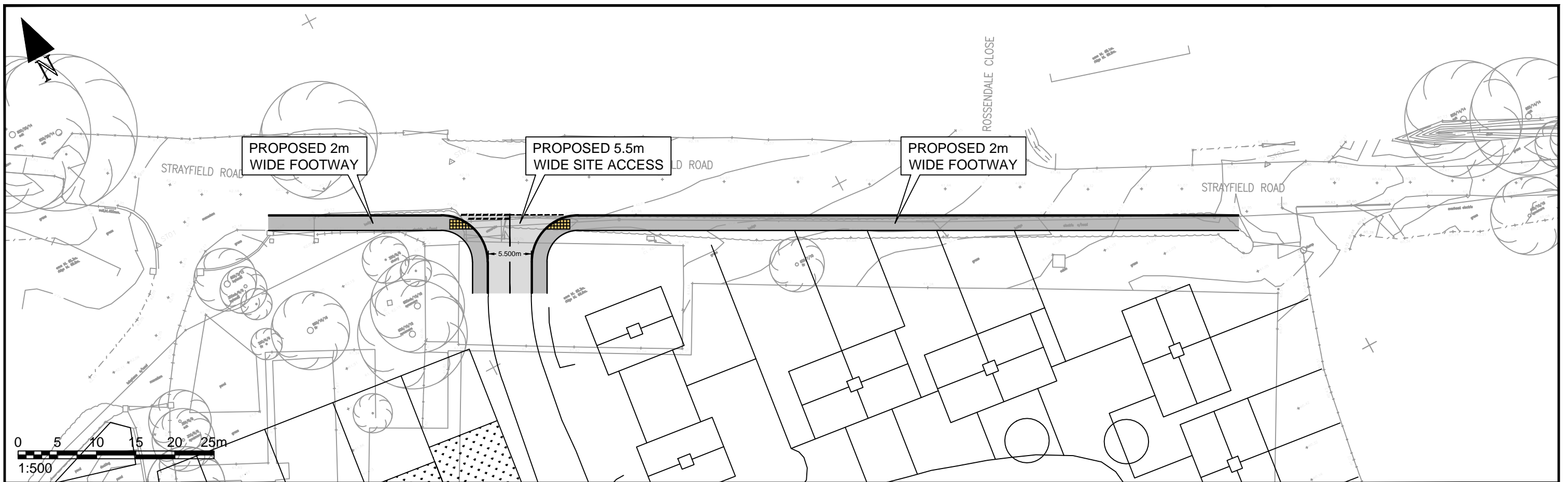
Project
**ANGLO AQUATIC
 STRAYFIELD ROAD
 ENFIELD**

Drawing Title
OUTLINE SURVEY

| Drawn | Date | Checked | Date |
|-------|----------|---------|----------|
| AT | NOV 2020 | AT | NOV 2020 |

Scale
1:500 (AT A1 SIZE)

Drawing Number
20070-S1



| REV | DETAILS | DRAWN | CHECKED | DATE |
|-----|---------|-------|---------|------|
| ... | ... | ... | ... | ... |

NOTES :

1. Do not scale from this drawing.
2. This drawing to be read & printed in colour.
3. This drawing is for illustrative purposes only, and not for construction.

PROJECT
Strayfield Road, Enfield

DRAWING TITLE
Proposed Highway Arrangement

CLIENT
Landsdown Land & Development

| | | | | |
|-----------------------------|------------|----------------------|------------------|--------------------|
| SCALE 1:250 / 1:500 | SIZE A3 | DRAWN BY DW | CHECKED BY KH | DATE 14.12.2021 |
| PROJECT REF 21108 | | DWG NO 001 | | REV |

Pulsar
TRANSPORT PLANNING

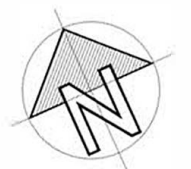
4 Underwood Row, London, N1 7LQ
Tel: 020 7324 2677
www.pulsartransport.co.uk

Anglo Aquatic Plant Co, Strayfield Road, Enfield EN2 9JE

Indicative Site Plan

Legend

1:1000 @ A3



1. New entrance
2. Five live-work units (green roofs)
3. Existing building (refurbished-serviced offices)
4. Existing ponds
5. SuDS - new pond
6. Communal Greenhouses
7. Allotments
8. Play area
9. Garages/car ports
10. Retained trees
11. New boundary hedge with trees

Page 173

| Rev | Date | Description | Drawn | Checked |
|-----|------|-------------|-------|---------|
| | | | | |

Do not scale from this drawing
All dimensions are to be checked on site
Any discrepancies are to be reported immediately to the Architect or Main Contractor

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Client
Lansdown

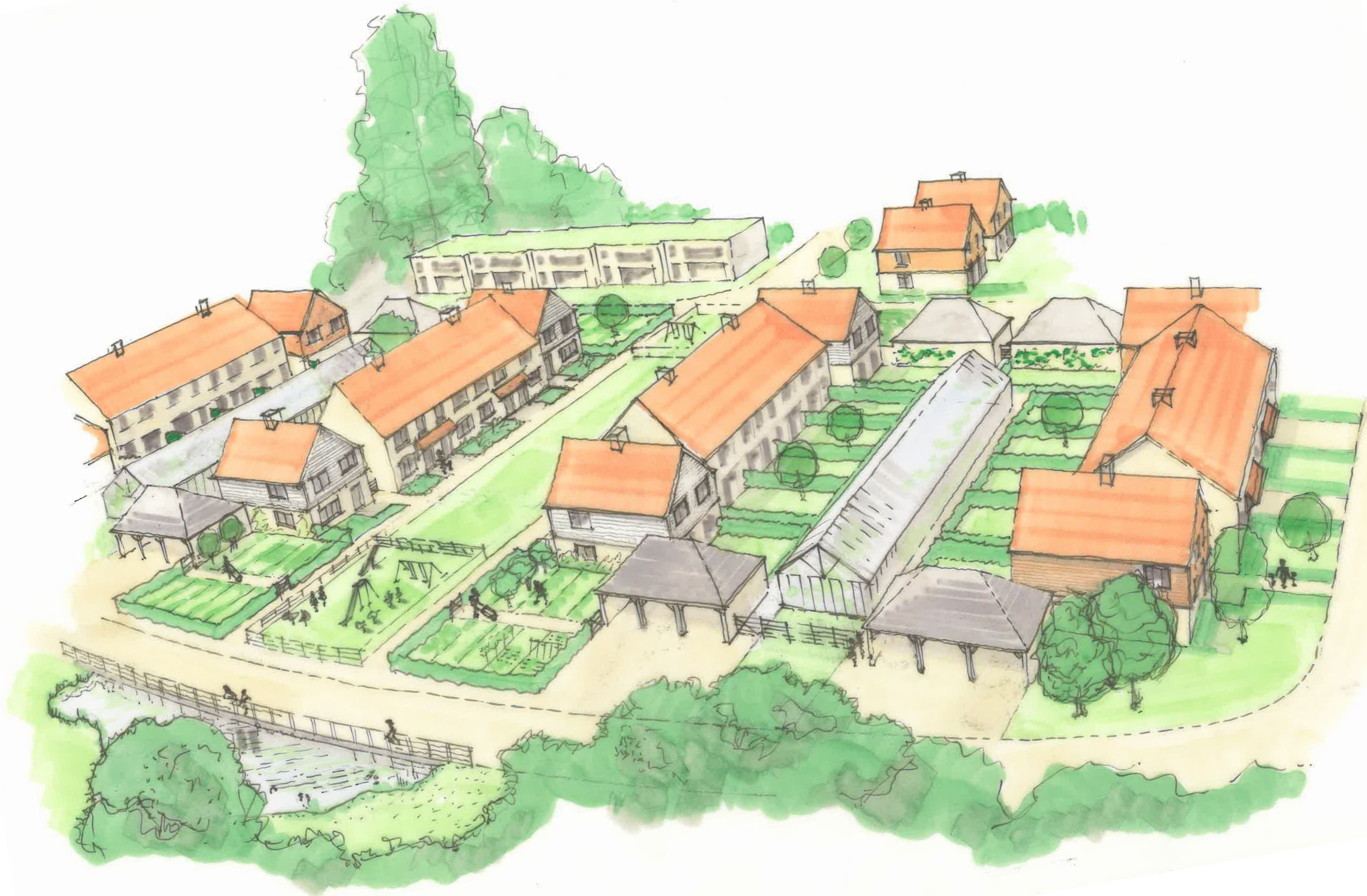
Project
Anglo Aquatic Plant Co
Strayfield Road, Enfield EN2 9JE

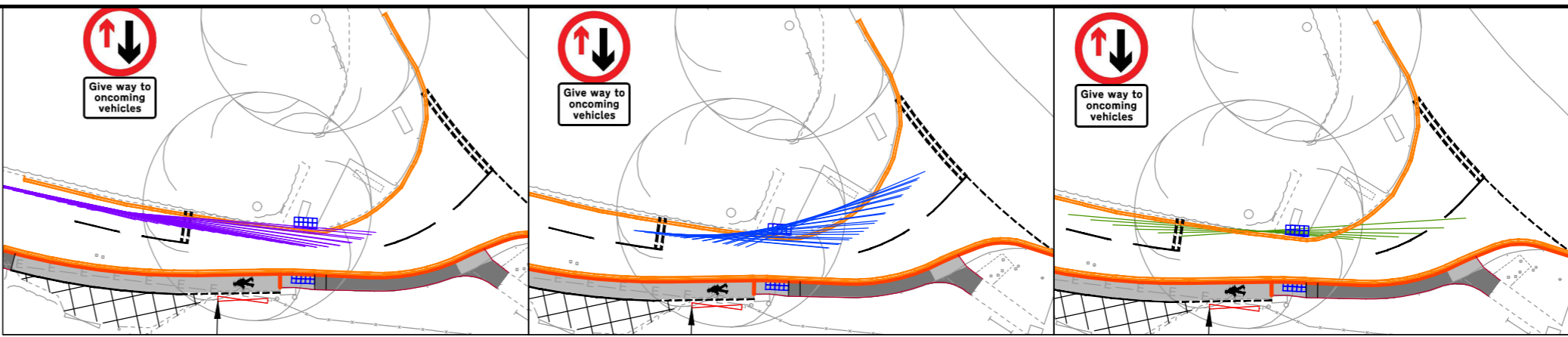
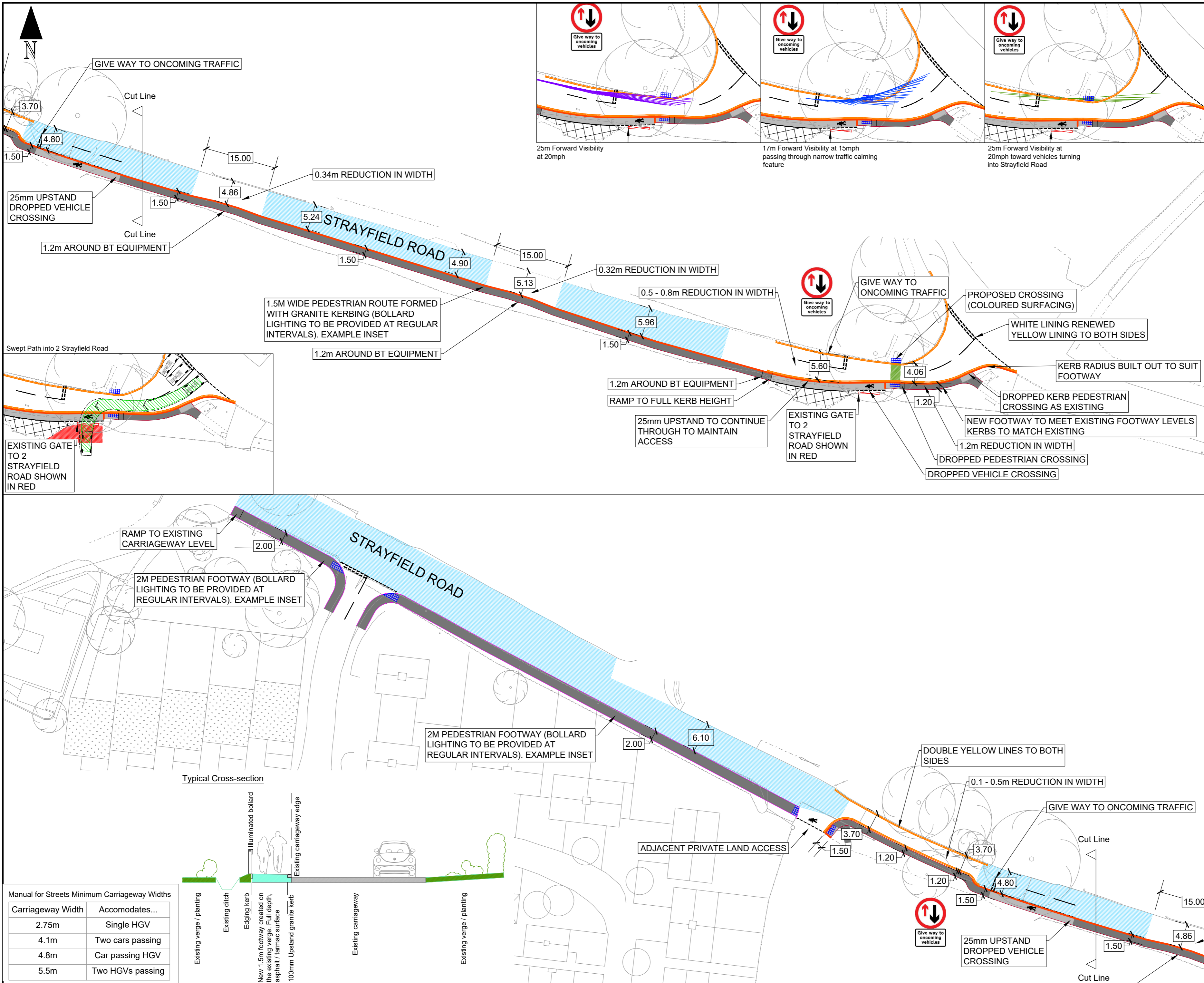
Drawing
Indicative Site Plan Legend
For illustrative purposes only

Scale
1:1000 @ A3

| Project No. | Drawing No. | Revision |
|-------------|-------------|----------|
| | | |

| Status | Date | Drawn by | Checked by |
|--------|-------|----------|------------|
| | Mar22 | DC | RM |

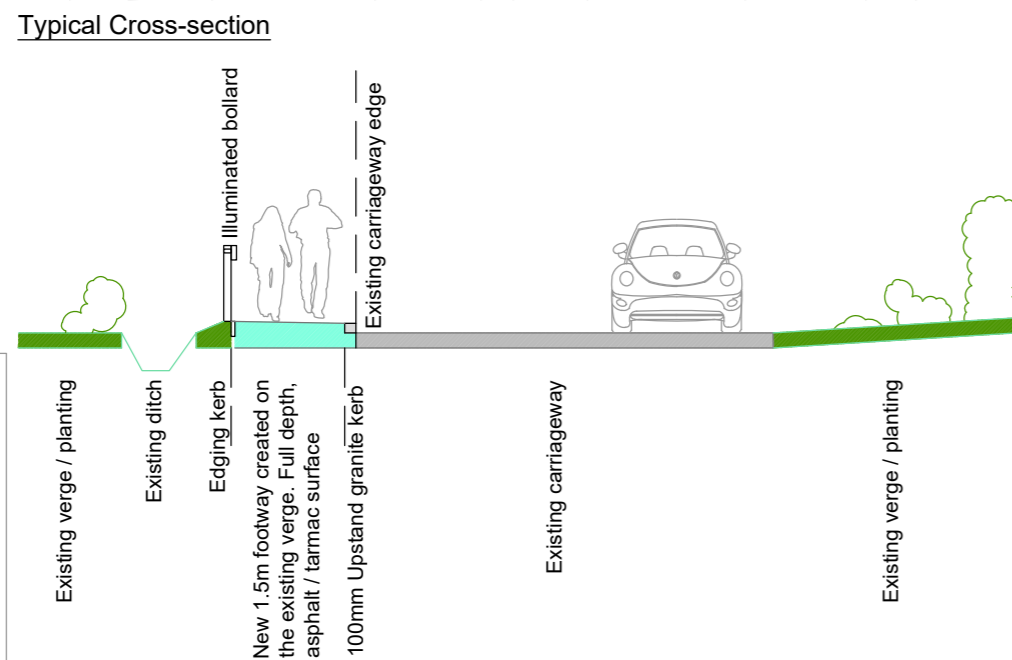
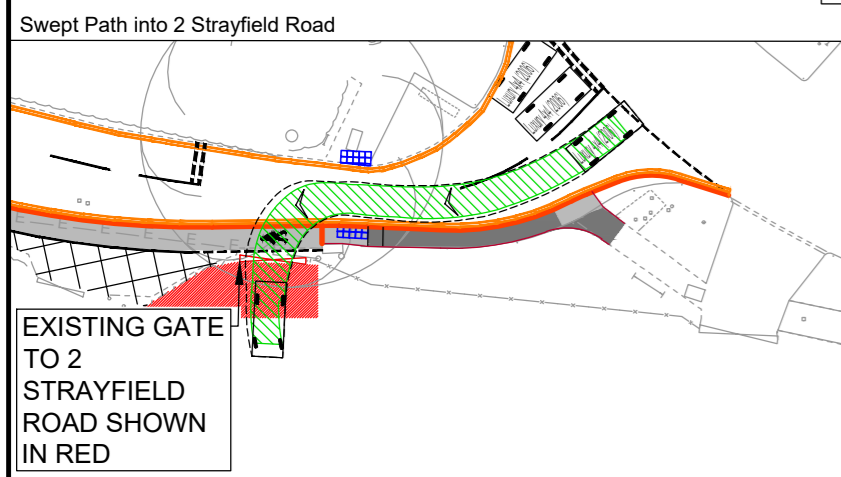




- Proposed granite Kerb
- Proposed granite Edging
- Pre-cast Concrete Kerbing / edging
- Tactile Paving
- 100mm upstand footway
- Flush / Dropped Kerb area
- No reduction of carriageway width



Example bollard / low level lighting with zero upward light at low lighting level with a low mounting height.



| Carriageway Width | Accommodates... |
|-------------------|------------------|
| 2.75m | Single HGV |
| 4.1m | Two cars passing |
| 4.8m | Car passing HGV |
| 5.5m | Two HGVs passing |

| | | | | |
|-----|------------------------------|-------|---------|------------|
| B | Road widths and yellow lines | PR | KH | 14/08/2023 |
| A | Amended following comments | PR | KH | 07/08/2023 |
| REV | DETAILS | DRAWN | CHECKED | DATE |

CLIENT
Lansdown

PROJECT
Strayfield Road, Enfield.

DRAWING TITLE
Pedestrian Route Kerbed Footway Option

SCALE
1:500

SIZE
A2

DRAWN BY
PR

CHECKED BY
KH

DATE
04.08.23

Pulsar
TRANSPORT PLANNING

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www.pulsartransport.co.uk

PROJECT REF
21108

DWG NO
009

REV
B

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