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PLANNING COMMITTEE

Tuesday, 16th July, 2024 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, Nelly Gyosheva, Ahmet Hasan, Bektas Ozer, Michael Rye OBE and Jim Steven

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**

Members are asked to declare any disclosable pecuniary, other pecuniary or non-pecuniary interests relating to items on the agenda.

3. **MINUTES OF PREVIOUS MEETING** (Pages 1 - 4)

To receive and agree the minutes of the meeting held on Tuesday 4 June 2024.

4. **REPORT OF THE HEAD OF PLANNING AND BUILDING CONTROL**
(Pages 5 - 8)

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

5. 22/03346/OUT - JOYCE AND SNELLS ESTATE, N18 (Pages 9 - 188)

RECOMMENDATION:

1. That subject to (i) a Shadow S106 Agreement being agreed to secure the matters covered in this report and to be appended to the decision notice and (ii) a Memorandum of Understanding being entered into to secure the obligations contained in the Shadow Section 106 Agreement and (iii) the Stage 2 Referral to the Mayor of London and no objection being received, that delegated authority be given to the Head of Development Management to grant planning permission subject to conditions.

2. That delegated authority be given to the Head of Development Management to finalise the conditions and the Shadow Section 106 Agreement to cover the matters identified in the report.

Ward: Upper Edmonton

6. 22/02248/FUL - 24-26 CHURCHBURY LANE, ENFIELD, EN1 3TY (Pages 189 - 196)

RECOMMENDATION:

That, following the decision to defer consideration of this application at the Planning Committee meeting of 4th June 2024 to enable officers to draft reasons for refusal reflecting concerns raised concerning overlooking and privacy and quality of accommodation and internal layout and amenity space provision, that Members confirm agreement to the reasons for refusal set out in the report.

WARD: Town

7. 21/01140/FUL - PUBLIC HOUSE, GREEN STREET, ENFIELD EN3 7SH (Pages 197 - 366)

RECOMMENDATION:

1. That planning permission be REFUSED

2. That the Head of Planning & Building Control be granted delegated authority to agree the final wording of the reasons for refusal as indicated in the Recommendation section of the report, subject to:

I. The inclusion of any changes requested by the GLA in their stage 2 referral and/or government body.

II. Prior to the decision being issued after consultation with the Chair, Vice Chair and Opposition lead on the materiality of any changes arising from any other development plan document or any new/altered other material planning consideration.

Ward: Brimsdown

8. DATES OF FUTURE MEETINGS

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

Tuesday 6 August 2024 (provisional)
Tuesday 17 September 2024
Wednesday 9 October 2024 (provisional)
Tuesday 15 October 2024
Tuesday 5 November 2024 (provisional)
Tuesday 19 November 2024
Tuesday 17 December 2024
Tuesday 21 January 2025
Tuesday 11 February 2025 (provisional)
Tuesday 25 February 2025
Tuesday 4 March 2025 (provisional)
Tuesday 18 March 2025
Tuesday 1 April 2025 (provisional)
Tuesday 22 April 2025

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

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PLANNING COMMITTEE - 4.6.2024

**MINUTES OF THE MEETING OF THE PLANNING COMMITTEE
HELD ON TUESDAY, 4 JUNE 2024****COUNCILLORS**

PRESENT Sinan Boztas (Chair), Mahym Bedekova (Vice Chair), Kate Anolue, Peter Fallart, Nelly Gyosheva, Ahmet Hasan, Bektas Ozer, Michael Rye OBE, Jim Steven and Alessandro Georgiou

ABSENT Josh Abey, Lee Chamberlain and Thomas Fawns

OFFICERS: Karen Page (Head of Planning and Building Control), Sharon Davidson (Planning Decisions Manager), Michael Kennedy (Principal Urban Designer), Mike Hoyland (Senior Transport Planner), Nicholas Page (Conservation and Heritage Adviser), Agnieszka Jezierska (Project Manager, Journeys & Places), Dimitra Kosmidou (Project Manager, Journeys & Places), Julie Thornton (Legal Services) and Jane Creer (Secretary)

Also Attending: Councillor Emma Supple (Town Ward Councillor)
Approx. 15 members of the public, applicant and agent representatives, and officers observing
Local press representative

1**WELCOME AND APOLOGIES**

The Chair welcomed everyone to the meeting.

Apologies for absence were received from Councillors Josh Abey, Lee Chamberlain and Thomas Fawns. Councillor Chamberlain was substituted by Councillor Alessandro Georgiou.

Apologies for lateness were received from Councillor Bektas Ozer.

2**DECLARATIONS OF INTEREST**

Councillor Mahym Bedekova declared a non-pecuniary personal interest on item 5, application reference 20/02628/FUL & 20/02629/LBC as she knew the agent, who had also been her agent for a past application in 2018. It was confirmed that this was not a sufficient interest to prevent Cllr Bedekova taking part in discussions and voting on item 5.

3**MINUTES OF PREVIOUS MEETING**

PLANNING COMMITTEE - 4.6.2024

The minutes of the Planning Committee meeting held on Tuesday 23 April 2024 were AGREED.

4

REPORT OF THE HEAD OF PLANNING AND BUILDING CONTROL

Received the report of the Head of Planning and Building Control, which was NOTED.

5

20/02628/FUL & 20/02629/LBC - 510 HERTFORD ROAD, ENFIELD, EN3 5SS

Sharon Davidson, Planning Decisions Manager, introduced the report, highlighting key aspects of the two applications (planning permission and listed building consent), which would be considered together.

An update to the report had been circulated and published, clarifying matters and updating elements in the report since its publication, and that Strategic Access Management Measures (SAMMs) and Sustainable Alternative Natural Greenspaces (SANGs) contributions would be secured through the Section 106 Agreement. Further information on heritage considerations was also set out and taken into consideration in reaching the conclusion on the overall level of harm to the heritage asset.

An additional condition was recommended in respect of works to the highway frontage in advance of occupation of the development.

Officers responded to Members' queries regarding heritage level of harm, car parking space, and local transport availability.

During the debate, Members expressed concern in respect of the lack of detail of the material finish to the new blocks, and that this should not clash with the listed building. Officers confirmed there would be a brick finish and that appropriate conditions were recommended. Officers agreed that, when the details of the material were received, the Chair and Opposition Lead of Planning Committee would be consulted for approval.

The proposals having been put separately to the vote, Members AGREED:

1. That planning permission be GRANTED with conditions and S106 Agreement for Sustainable Transport Contribution. Together with the updated condition and additional contributions to be secured for SAMMs and SANGs.
2. That Listed Building consent be GRANTED with conditions.
3. The Planning Decisions Manager be granted delegated authority to finalise the wording of the Section 106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of the report.

6

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

PLANNING COMMITTEE - 4.6.2024

Sharon Davidson, Planning Decisions Manager, introduced the report, highlighting key aspects of the application, and the planning history, and details of the appeal against an earlier refusal of planning permission.

Councillor Ozer arrived at the meeting near the beginning of the officer's introduction, and having not missed any information not included in the report, or any debate or deputations, would be permitted to vote on the item.

Officers highlighted the revisions made to the application, and that the harms identified by the Planning Inspector had now been sufficiently addressed. A condition would address compliance to tree protection measures. Officers were satisfied with SUDS and drainage arrangements, and compliance with fire safety requirements.

A deputation was received from Kieran McCarthy, on behalf of the Churchbury Lane, Fir Tree Walk, Fyfield and St Andrew's Roads Community against the officers' recommendation.

A statement was received on behalf of constituents against the officers' recommendation from Councillor Emma Supple, Town Ward Councillor.

Officers confirmed that the agent was not attending this meeting.

Members' questions were responded to by officers. Proposed numbers of residents and staff were clarified. Information in respect of glazing and relationship to neighbouring properties and potential for overlooking, and quality/standards of the supported living units was clarified.

Councillor Georgiou left the meeting room briefly during a lengthy question, and having not missed any of the debate, would be permitted vote on the item.

During the debate, Members expressed ongoing concerns about the proposal and received further advice from officers, particularly on those matters previously considered by the Planning Inspector and found acceptable. Advice from the Legal officer was also received in advance of a vote.

A counter motion was proposed by Councillor Rye, seconded by Councillor Ozer, that Members considered that the Planning Inspector's concerns had not been sufficiently addressed, and that a decision on the application be deferred for officers to prepare reasons for refusal in respect of (a) overlooking and privacy; and (b) quality of accommodation and internal layout and amenity space provision.

The proposal having been put to the vote, Members AGREED that a decision on the application be deferred for the above reason.

PLANNING COMMITTEE - 4.6.2024

DEVONSHIRE ROAD AT THE JUNCTION WITH GREEN LANES IN PALMERS GREEN

Karen Page, Head of Planning and Building Control, introduced the report, highlighting the required approval to make an order under Section 249 of the Town and Country Planning Act 1990, and the background to the project.

During the debate, officers responded to Members' questions, in respect of public consultation, procedure for handling objections, and delegation of authority on the final scheme and its implementation.

The proposal having been put to the vote, Members AGREED:

1. To adopt the proposal as set out in the report to extinguish vehicular access rights over the junction at Devonshire Road where it meets Green Lanes.
2. To delegate authority to the Programme Director for Journeys and Places to proceed to advertise an Order pursuant to Section 249 of the Town and Country Planning Act 1990 to facilitate the pedestrianisation.
3. Subject to fulfilling the requirements of Section 252 of the Town and Country Planning Act 1990, to delegate authority for determining whether or not to proceed with the Order received to the Cabinet Member for Transport and Waste, Cllr Rick Jewell following consideration of any objections and representations in a Portfolio Report.
4. To delegate authority to the Programme Director of Journeys and Places in consultation with the Cabinet Member for Transport and Waste, Cllr Rick Jewell, on the final scheme design and subsequent implementation.

8

DATES OF FUTURE MEETINGS

Members NOTED the dates of future meetings for 2024/25 set out in the agenda.

It was confirmed that meetings would go ahead on Tuesday 18 June 2024 and Tuesday 16 July 2024, but that no meeting was required on Tuesday 2 July 2024.



London Borough of Enfield

Report Title	Report of Head of Planning and Building Control
Report to	Planning Committee
Date of Meeting	16 th July 2024
Cabinet Member	Councillor Susan Erbil
Executive Director / Director	Brett Leahy – Director of Planning & Growth Perry Scott – Environment & Communities
Report Author	Karen Page karen.page@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, 300 applications were determined between 05.06.2024 and 03.07.2024, of which 235 were granted and 65 refused.

Relevance to Council Plans and Strategies

8. 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

9. None

Legal Implications

10. None

Equalities Implications

11. **None**

Report Author: Karen Page
Head of Planning and Building Control
Karen.page@enfield.gov.uk
02081323039

Date of report: 03.07.2024

Appendices

None.

Background Papers

To be found on files indicated in Schedule.

Background Papers

None

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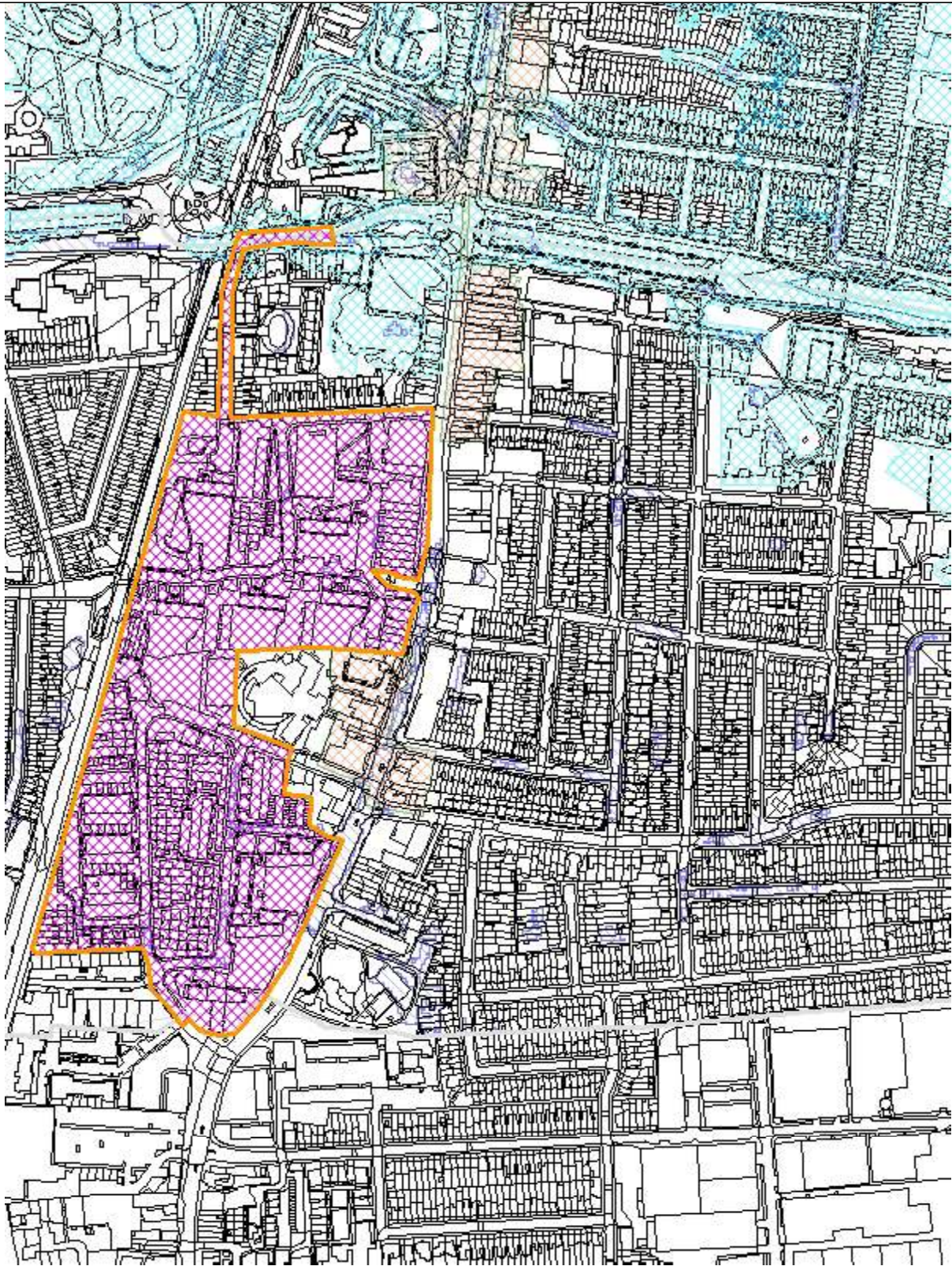
LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE	Date: 16 th July 2024	
Report of Director of Planning & Growth - Brett Leahy	Contact Officers: Joe Aggar Sharon Davidson	Category: Major
Ward: Upper Edmonton	Councillor Request: No	
LOCATION: Joyce and Snells Estate, N18		
APPLICATION NUMBER: 22/03346/OUT		
<p>PROPOSAL: Hybrid planning application (part detailed / part outline) for the phased demolition of all existing buildings and structures, site preparation works and the comprehensive residential-led mixed use redevelopment of the Joyce Avenue and Snell's Park Estates comprising:</p> <p>Detailed planning application for Phases 0-3 comprising demolition of 12no. existing residential blocks and associated structures and Boundary Hall and construction of residential and mixed-use buildings providing ground floor flexible commercial floorspace (Use Class E(a, b, c and e)) and community floorspace (Use Class F2(b)), residential dwellings (Use Class C3) along with associated road layout, means of access including new pedestrian crossing over Sterling Way, highways works including alterations to junction of College Close and Sterling Way, car and cycle parking, hard and soft landscaping, amenity space, public, communal and private realm, ancillary plant and structures including new substation and associated works.</p> <p>Outline planning application (with all matters reserved) for Phases 4-10 including the demolition of all remaining buildings and structures and the construction of buildings for residential dwellings (Use Class C3), flexible commercial floorspace (Use Class E) including allowance for a drinking establishment (Sui Generis), civic and community floorspace and facilities including temporary re-provision of Boundary Hall (Use Classes F1 and F2) with associated road layout, means of access including new pedestrian walkway connecting to existing bridge to Bridport Road, highways works, car and cycle parking, hard and soft landscaping including improvements to the boundary of St John and St James Church of England Primary School, amenity space, public, communal and private realm, ancillary plant and structures and other associated works. (An Environmental Statement, including a non-technical summary, also accompanies the planning application in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)).</p>		

Applicant Name & Address: London Borough of Enfield Housing	Agent Name & Address: HTA, 75 Wallis Road London, E9 5LN
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RECOMMENDATION:

1. That subject to (i) a Shadow S106 Agreement being agreed to secure the matters covered in this report and to be appended to the decision notice and (ii) a Memorandum of Understanding being entered into to secure the obligations contained in the Shadow Section 106 Agreement and (iii) the Stage 2 Referral to the Mayor of London and no objection being received, that delegated authority be given to the Head of Development Management to grant planning permission subject to conditions.
2. That delegated authority be given to the Head of Development Management to finalise the conditions and the Shadow Section 106 Agreement to cover the matters identified in the report.

Ref: 22/03346/OUT LOCATION: Joyce Avenue And Snells Park Estate, London, N18.



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Scale 1:1250

North



1. Note for Members

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

2. Recommendation

- 2.1. That subject to (i) a Shadow S106 Agreement being agreed to secure the matters covered in this report and to be appended to the decision notice and (ii) a Memorandum of Understanding being entered into to secure the obligations contained in the Shadow Section 106 Agreement and (iii) the Stage 2 Referral to the Mayor of London and no objection being received, that delegated authority be given to the Head of Development Management to grant planning permission subject to conditions.
- 2.2. That delegated authority be given to the Head of Development Management to finalise the conditions and the Shadow Section 106 Agreement to cover the matters identified in the report.

Conditions Relating to All Development

1. Conditions Phases 0-3 (Full Element)

- Time Limit (3 years)
- Development in accordance with Approved Plans
- Details of Materials
- Details of Levels
- Quantum of Development
- Housing Mix (compliance)
- Details of Phasing Plan
- Reserve Matters Application requiring replacement and operation of Boundary Hall
- Permitted uses: Non-Residential Floorspace (compliance)
- Hours of Use: Non-residential (compliance)
- Details of the Energy Centre and completion prior to Phase 0
- Energy Strategy (compliance)
- Details of the Temporary Bridge and completion prior to the occupation of Phase 0
- Heritage Plan and recording of non-designated heritage asset
- Childrens Play Area in accordance with phasing and details
- Details of temporary playground and delivered before occupation of Block A
- Details of access to rooftops of Blocks N and K
- Details of Wind mitigation Blocks N and K
- Biodiversity Net Gain Assessment (compliance)
- Fire Statement (compliance)

2. Conditions Phases 4-10 (Outline Element)

- Time Limit
- Development in accordance with Approved Plans
- Reserved Matters Scope
- Submission of Reserved Matters
- Details Phasing Plans and delivery of infrastructure prior to relevant phase
- Restriction of non-residential floorspace
- Restriction of café/sui generis floorspace
- Provision of Childrens nursery prior to occupation of Phase 4 and maximum occupancy
- Details of Childrens Nursery external play space
- Delivery and details of the access to the bridge prior to occupation of Phase 4
- Details of school boundary
- Completion of commercial units prior to occupation of residential units
- Details of commercial shopfronts and signage
- BNG Assessment
- Wind Mitigation
- Fire Statement Addendum
- Overheating Assessment
- Prior to the demolition of Phase 6, details of the treatment to the flank elevation to White Horse Public House
- Details of MUGA and operation prior to occupation of Phase 4
- Basement Impact Assessment
- Details of Community space for use by Metropolitan police

3. Hybrid (Full and Outline)

- (Grampian Condition) Signing of s106 by any Third Party
- Compliance with EIA
- Compliance with EIA mitigation
- Quantum of Development and min. and max.
- Maximum number of residential units
- Piling Method Statement (sewer)
- Piling Method Statement (water mains)
- Foul Water Network Upgrades
- Surface Water Network Upgrades
- All Water Network Upgrades
- Archaeology Written Scheme of Investigation
- Archaeological Field Work
- Sound Attenuation
- Acoustic report
- All Non-Road Mobile Machinery (NRMM)
- Construction Environmental Management Plan
- Site Waste Management Plan
- Contaminated Land
- Contamination (Verification Report)
- Contamination (not previously identified)
- Unexploded Ordnance (UXO)
- Fire evacuation lifts
- Details of Refuse and Recycling
- Delivery and Servicing Plan
- Parking Design and Management Plan, including car club bays
- Wheelchair parking bays min. level

- Digital connectivity
- Details of public realm fronting Fore Street
- Boundary Treatments
- Accessible and Adaptable Dwellings
- Wheelchair Adaptable dwellings
- Water consumption
- Details of College Close junction
- Parking spaces to be provided prior to occupation of residential units
- Cycle Parking Provision
- Electric Vehicle Charging
- Secure by Design
- Removal of permitted development rights for conversion to residential
- Restriction of permitted development – residential
- Telecommunication apparatus
- No plant and equipment fixed to external facades
- Updated Overheating and Cooling – Residential
- Updated Energy Statement
- Details of Brown/Green Roofs
- Details of Solar PVs
- Details of Drainage Strategy
- Sustainable Drainage Verification
- Ground Water Monitoring
- Whole Lifecycle Carbon Assessment
- Circular Economy Statement
- BREEAM Assessment, non-residential
- Biodiversity Net Gain Assessment
- Tree Method Statement and Tree Retention Plan
- Details of Temporary Landscaping
- Landscaping details, including play space allotments and green roofs
- Landscape and Ecological Management Plan
- First Planting Season or the substantial completion of the development
- Details of Lighting Strategy
- Details of shopfront signage, signage zones and wayfinding
- No works in nesting season
- Updated Bat survey
- Details of Biodiversity Enhancements
- Relocation of Gilpin's Bell Structure
- Details of fixed plant

3. Executive Summary

- 3.1. The London Borough of Enfield (LBE) Housing Team is seeking to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This includes delivering several housing renewal and estate regeneration schemes across the Borough.
- 3.2. Joyce and Snells Estate has been identified as a key site forming part of LBE's development programme, with a greater number of high-quality homes, including a significant uplift in affordable housing. Through extensive pre-application discussions with the Local Planning Authority (LPA), inclusive of reviews of the development proposal with the Enfield Place and Design Quality Panel, the applicant has developed a comprehensive masterplan for the site, which offers an opportunity to increase the number of homes, including affordable homes, whilst better integrating the site into the surrounding community and improving the sense of neighbourhood safety.
- 3.3. This hybrid application, is seeking Full and Outline planning permission for a phased, comprehensive residential-led mixed use redevelopment comprising up to 2,028 residential homes (Use Class C3), a new community centre (Use Class F2), a new nursery (F2), an energy centre and flexible commercial floorspace (Use Class E, Sui Generis) in buildings of up to 26-storeys, together with new publicly accessible parks, landscaping, public realm, pedestrian and cycle connections and highways/access works.
- 3.4. The development offers up to 1,013 affordable homes (additional 579 net affordable homes). 53% of the gross number of new housing will be affordable (based on habitable rooms). 49% of the homes would be affordable based on units. The affordable homes will be appropriately split across Social Rent, Shared Ownership and Shared Equity tenures.
- 3.5. A good dwelling mix and range of housing tenures is provided to meet the needs of those residents who wish to stay on the estate. The proposed level of family-housing (386 units overall) is less than Local Plan policy calls for. However, this has been shaped by the characteristics of the scheme. As an estate regeneration project, decant and rehousing requirements have taken priority and therefore this represents the maximum level of family housing based on the overall viability of the scheme and provides a valuable net uplift (262 homes, 3bed + units) in family homes above that which currently exist on the site.
- 3.6. The proposed development would provide community uses, flexible commercial and purpose-built workspaces spaces. The provision of new social infrastructure will provide improved facilities and capacity for proposed residents. Furthermore, the proposed new commercial floorspace would support an overall increase in mixed employment and have no adverse impact on the vitality and vibrancy of the Angel Edmonton Designated Centre.
- 3.7. The design and layout of the proposed masterplan is supported. The scheme is based on robust urban design principles and objectives in terms of creating a highly legible and permeable layout of streets and public squares centred on a strong landscape-led vision for the site. Overall, the architectural design and detailing is of a high standard.

- 3.8. The proposals include tall buildings. The proposed heights would not accord with the Council's tall buildings policy (both current and emerging policies). However, the visual, functional, environmental, and cumulative impacts of the tall buildings are considered to be, on balance, acceptable, in this instance, taking the Development Plan as a whole, particularly in the context of the Councils shortfall in housing land supply (the 'tilted balance').
- 3.9. The Joyce and Snells Estate comprises a non-designated heritage asset NDHA) and also adjoins the Fore Street Conservation Area and North Tottenham Conservation Area and nearby listed buildings. The proposal would result in the total loss in the significance of the estate (NDHA), given it is proposed for demolition. The identified harm, notably less than substantial harm, to the non-designated and designated heritage assets has been balanced against the benefits of the development, noting that considerable importance and weight should be attached to this harm, in reaching a conclusion as to the acceptability of the proposals.
- 3.10. The application proposes new publicly accessible parks, landscaping, public realm, pedestrian and cycle connections, highways/access works. The proposal includes a high quality and well-considered landscape strategy. This would provide significant qualitative improvements to the open space as well as a small uplift in the overall amount of open space on site. The proposal includes a large increase in tree coverage on the site. Subject to recommended conditions and s106 obligations, a good level and quality of play space is proposed, with offsite enhancements, to Florence Hayes Recreation Ground.
- 3.11. All proposed homes would meet relevant residential space standards (floorspace, layout, floor to ceiling heights). Some new residential units would not achieve recommended internal daylight and sunlight levels to habitable rooms. This is taking into consideration the higher density nature of the scheme and is offset by the majority of units being dual aspect, together with acceptable orientation, layout of proposed homes and appropriate private amenity space. The provision of private and communal space is also considered acceptable. Overall, the quality of residential accommodation proposed is considered acceptable.
- 3.12. The proposed development is considered to have been designed to minimise impacts on residential amenity. Nonetheless the proposals would result in some adverse impacts in terms of loss of daylight, sunlight and sun-on-ground to neighbouring residential properties. Consideration should be given to the sites urban context in considering relative reductions in daylight and sunlight to neighbouring properties, as well as the existing openness to parts of the site. The identified adverse impacts to daylight and sunlight to neighbouring properties is considered to be outweighed by the overall benefits of the proposal, set out in the report.
- 3.13. The application proposes a new energy centre in the detailed phases for connection to the decentralised energy network, several energy efficiency measures, optimisation of the design to reduce carbon emissions and on-site renewable energy. Moreover, inclusive design measures have been incorporated into the scheme as well as landscape features and biodiversity measures, in accordance with planning policy.
- 3.14. Overall, the residential-led development seeks to extend the provision of housing by making more efficient use of land and providing a high quality of

homes. The estate redevelopment will allow for the provision of 2,028 new homes overall, new landscaping and public realm, to make better use of the site. The proposed scheme is a sustainable form of development on brownfield land, in a sustainable location. The primary public benefits of the scheme can be summarised as follows:

- Optimising the site and making effective use of a brownfield site
- A significant contribution of 1,233 additional homes to the Borough's housing target
- Delivery of 1,013 affordable homes, comprising 53% of the total gross housing offer (habitable rooms)
- Single decant and right of return for existing residents
- Delivery of 386 family-sized homes
- New civic hub to Fore Street, community space and nursery
- New accommodation for commercial units and maker spaces
- Provision of two new parks, pocket parks, landscaping and public realm
- New MUGA on site and upgrade to existing off-site MUGA
- New signalised pedestrian crossing over the A406
- Improving accessibility to Silver Street Station and Pymmes Park
- Strategic cycle and pedestrian connections along green routes north/south and east/west routes, including a ramp to the bridge over the railway
- Functional outdoor amenity space, play areas and private amenity spaces
- Achieving reduced carbon emissions through connection to the Enfield FDistrict Heat Network and carbon offset contributions
- Integration of on-site sustainable urban drainage measures across the site
- 72.21% on-site biodiversity enhancements across the masterplan and 726 new trees
- Improved quality of place and safer/more secure environment
- S106 contributions towards improvements and mitigation in the vicinity of the site including public realm/heritage, health, education, transport, carbon offsetting and open space/play provision contributions.

- 3.15. The report details all relevant national, regional, and local policy implications of the scheme, including supplementary planning guidance. Overall, the hybrid planning application is considered in accordance with adopted planning policy and is recommended for approval.
- 3.16. The application will require a shadow section 106 agreement with suitable planning obligations to be agreed including financial contributions, as set out in the report, to mitigate the impacts of the development; thus, overall, together with the imposition of appropriate planning conditions the planning application is considered acceptable and in accordance with the Development Plan, when read as a whole.

4. Site and Surroundings

4.1. The site is Joyce Avenue and Snell's Park Estate (referred to as 'the Site') (known as 'Joyce and Snell's Estate'). The estate was constructed between the late 1950s and early 1960s. The Site is in the Upper Edmonton ward and is approximately 10.11 hectares in size.



Key

- | | |
|---------------------------------------|-----------------------|
| 1 Joyce Avenue Estate | A College Close |
| 2 Snell's Park Estate | B Fore Street |
| 3 St John + St James Primary School | C Bridport Road |
| 4 Silver Street railway station | D Joyce Avenue |
| 5 Pymmes Park | E Colyton Way |
| 6 Railway bridge | F Grove Street |
| 7 North Middlesex University Hospital | G Claremont Street |
| 8 Florence Hayes recreational ground | H Snell's Park |
| 9 Langhedge Lane industrial site | J Langhedge Close |
| 10 Brook House Primary School | K Langhedge Lane |
| | L Tottenham High Road |
- Hybrid application boundary

- 4.2. There are 795 existing residential dwellings (Use Class C3) on the site, of which, 434 are affordable tenure (390 social rented homes and 44 homes managed by various housing associations). 361 homes on the estate are in private ownership. The residential buildings on site range from 2 to 15-storeys in height. The existing housing varies in style and height, including eight, 9-storey slab blocks and one taller 15-storey slab block, two-storey terraced homes and blocks of flats.
- 4.3. There are a range of retail, civic, community, employment, and other town centre uses (Use Classes E, F, and Sui Generis) within the Site, primarily located along Fore Street. The existing units consist of 2-3 storey buildings with residential or storage/office space on the upper floors. The Angel Edmonton District Centre also includes the adjacent Lidl to the north and commercial buildings along Sterling Way, which are outside of the site boundary.
- 4.4. A section of land in the centre of the Site is excluded from the site boundary, albeit the school boundary is included within the application site. This comprises St John and St James Primary School, Edmonton County Court and St James's Court. The petrol station and Edmonton Temple adjoin but are also not within the site boundary. Similarly, the White Horse Public House on Fore Street directly abuts the site boundary.
- 4.5. The Site includes Boundary Hall and the Angel Yard, in the southern part of the estate, which currently provides community/civic space and employment workspace respectively through planning permission 21/03375/RE4. The permission is for a meanwhile use, lasting 5 years. The works have been completed for the temporary redevelopment and use of garages and a laundry yard to the south of Grove Street, providing 600sqm of affordable office and workplace (artists/craftspeople, and other small businesses) along with a café for start-ups.
- 4.6. The Site is bounded by Fore Street, which is a busy commercial thoroughfare running north to south. The north of the site is bounded by two storey terraced dwellings along College Gardens and College Close, and beyond is the A406 North Circular Road and Silver Street Overground Station. To the west is an overland railway line. To the south, the site is bound by Langhedge Lane and the associated industrial estate and Brook House Primary School immediately beyond this, where the site adjoins the borough boundary with Haringey.
- 4.7. The site falls within a Public Transport Accessibility Level (PTAL) of 3 to 5, on a scale from 0-6b, with 6b representing the highest level of public transport access. The nearest station is Silver Street, served by the Overground and to the north side of Sterling Way. White Hart Lane Overground Station is also located to the south. The Overground viaduct is adjacent to the western edge of the Site. There are bus stops located on Fore Street, Sterling Way and Bridport Road, providing access to the 149, 259, 279, 249, 34, 102, 144, 444 and the 491 service. Cycleway 1 terminates around 700 metres to the south.
- 4.8. The proposed development site straddles part of the A406 North Circular Road known locally as Sterling Way and Angel Road which form part of the Transport for London Road Network (TLRN). Fore Street forms part of the Strategic Road Network (SRN) and is managed by LB Enfield. To the west there is a footbridge over the railway line which provides access to Bridport Road.

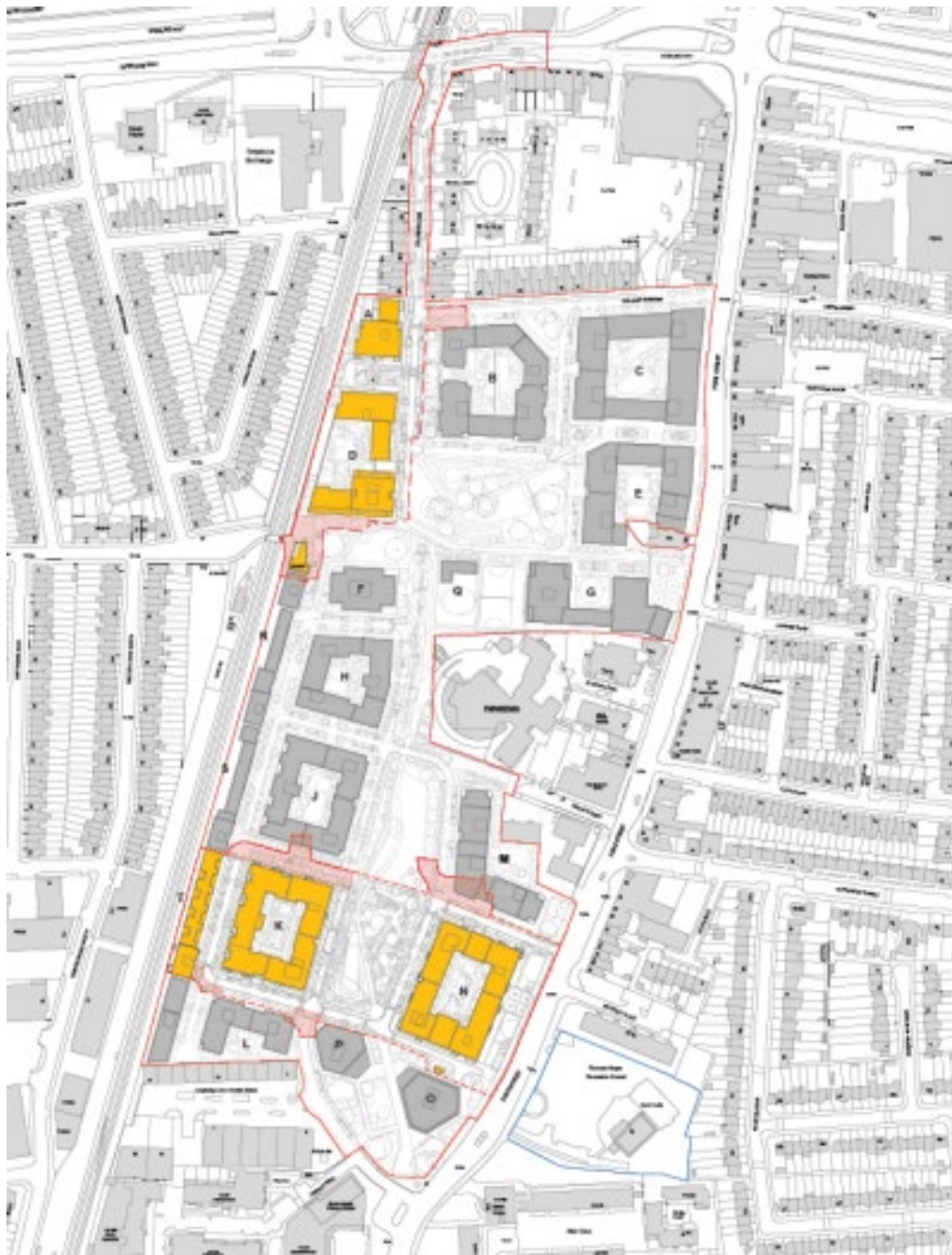
- 4.9. The Fore Street Conservation Area is adjacent to the Site and covers several buildings located on the eastern side of Fore Street and to the north of Sterling Way and the A406 North Circular. The Fore Street Conservation Area also covers Edmonton County Court and several buildings on both sides of Fore Street. The North Tottenham Conservation Area is to the south and falls within London Borough of Haringey.
- 4.10. The site itself forms a non-designated heritage asset. The site does not include any statutorily listed buildings. The closest listed buildings are Grade II listed 859-863 and 867-869 High Road in Haringey which are to the south; and the Grade II listed Angel Place (183-191 Fore Street) to the north, within Enfield.
- 4.11. In terms of the wider context, North Middlesex University Hospital and predominantly two-storey residential streets are to the west; the A406 North Circular and Edmonton Town Centre are to north. Industrial buildings are to the south / south-west which fall within designated Locally Significant Industrial Site (LSIS). To the south is the borough boundary with the London Borough of Haringey. The Cannon Road development is to the south of the Site and comprises residential blocks ranging in height from 6 to 10, together with a 22-storey tower (Brook House) and a primary school in Haringey.
- 4.12. Further along High Road, to the south, are regeneration sites, including the High Road West Masterplan. This includes proposals for the regeneration of the Love Lane Estate as well as the new Tottenham Hotspur Stadium. Further to the east, within Enfield, is Meridian Water Regeneration Area.

5. Proposal

- 5.1 This is a 'Hybrid' planning application (part full, part outline) for the redevelopment of Joyce and Snells Estate. The Proposed Development is intended to be brought forward in 11 Phases (0-10).
- 5.2 Phases 0-3 are covered in the Detailed Element of the Hybrid Planning Application. The detailed phases 0-3 are in 'Full' (with all details submitted for approval at this stage).
- 5.3 The Detailed Phases seek permission for 575 residential units. 526 of the units (91%) would be affordable homes. In addition, 455sqm of commercial floor space (in Block N) and 103sqm of community floorspace (in Block D) are proposed.
- 5.4 Phases 4-10 are within the Outline Element with all matters reserved for subsequent Reserved Matters approval.
- 5.5 The Outline Phases seek permission for up to 138,000sqm (GIA) residential floorspace which could deliver 1,453 homes. The tenure mix would comprise 66% private and 34% affordable (by unit). 487 affordable homes are proposed within the Outline Element. In addition, up to 2,632sqm of community use, up to 250sqm of nursery use, 2,526sqm of commercial floorspace and 793sqm of employment workspace and a minimum of 23,918sqm of landscaped spaces are proposed.
- 5.6 The elements where 'Full' and 'Outline' permission are sought, is summarised below:

Detailed Element (Phases 0-3)

- 5.7 Full details are submitted for approval in relation to the Detailed Element, (also referred to as Phases 0-3) of the Proposed Development. This comprises the development of Blocks A, D, K, N and T (highlighted in yellow).
- 5.8 In addition, new open space and public realm, access and highways works, car and cycle parking are proposed. An Energy Centre serving the wider development is also proposed. The Detailed Element also includes a signalised crossing on Sterling Way for improved access to Silver Street station and to Pymmes Park, to the north of site.



Detailed Blocks (Full Element) – Highlighted in yellow

Block A, Energy Centre and Temporary Footbridge (Phase 0)

- 5.9 Block A is the first block to come forward as part of the Proposed Development in Phase 0. Block A comprises a part 5-, part 10-storey building and is laid out as a series of maisonettes with flats above, adjacent to a taller block of flats.
- 5.10 Block A is 100% residential, providing a total of 50 homes comprised of 9no. one-bed flats, 34no. two bed-flats, 4 no. three-bed flats and 3no. five-bed flats. 11 (22%) of these units are to be shared equity, 11 are to be shared ownership and 10 (20%) replacement social rent homes and 18 (36%) social rent uplift homes.
- 5.11 The existing playground to the north-west of the Site is to be temporarily relocated to land immediately to the west of the St John and St James CofE Primary School. This is to allow early enabling works, to facilitate the development of Block A within Phase 0, until such time that the first part of the new public park, between Blocks N and K is completed at the end of Phase 3.
- 5.12 The existing garages adjacent to the railway line will be demolished to deliver a new single storey substation, approximately 145sqm to facilitate the heat district network, supplying energy to the site. Improvements are proposed to the existing bridge footpath. The steps to the existing ramp will be replaced, with new steps north of the substation. In the later phases (Phase 4), the temporary ramp structure is proposed to be replaced as part of wider public realm proposals within that phase.

Block D and Pocket Park (Phase 1)

- 5.13 Located in the north-west of the Site immediately to the south of Block A, Block D is the second block to come forward as part of Phase 1 of the Proposed Development. Block D is formed of three built elements which are set around an internal courtyard above a podium and is a part 8-, part 13-, and part 26-storey building.
- 5.14 Block D is a predominantly residential building providing 220 homes comprised of 54no. one-bed flats, 84no. two-bed flats, 4no. two-bed maisonettes, 64no. three-bed flats, 12no. three-bed maisonettes and 2no. four-bed maisonettes. 41 (19%) of these units are to be shared equity, 47 (21%) are shared ownership, 47 (21%) are to be replacement social rent homes and 85 (39%) are to be social rent uplift homes, in addition to those replaced. This block also includes 103sqm (GIA) of new community floorspace at ground floor level.
- 5.15 A community garden (pocket park) is proposed to be located between Blocks A and D, which will provide amenity space for the adjacent blocks. The space is divided into three areas dedicated to 0-4 doorstep play, social space and community growing garden for residents, with defensible planting around the periphery (to provide privacy for ground floor homes and to protect against the adjacent railway line).

Block N, Gas Governor and Public Realm to Fore Street (Phase 2)

- 5.16 Block N is a courtyard block located to the south-east of the Site and is the third block proposed to come forward within Phase 2. It is a part 5-, part 6-, part 7-, part 8-, and part 10-storey building with retail on the ground floor to Fore Street.

- 5.17 Block N provides 148 homes and commercial uses at ground floor level fronting Fore Street. The block is comprised of 74no. one-bed flats, 34no. two-bed flats, 32no. three-bed flats, 8no. three-bed maisonettes. 14 (9%) of these units are to be shared equity, 49 (33%) are for market sale, 57 (39%) are replacement social rent homes and 28 (19%) are social rent uplift homes.
- 5.18 455sqm (GIA) of commercial / retail floorspace is provided at the ground floor fronting onto Fore Street (Use Class E). A new pedestrianised/public realm area is proposed between the commercial units of Block N and Fore Street. This would comprise a new plaza space with seating and raised planting area.
- 5.19 The existing Boundary Hall (329 sqm GIA) is to be demolished in Phase 2 of the Detailed Element to facilitate the construction of Block N. A temporary community facility is to be provided in the Outline Element, located to the north of Block N, adjacent to Angel Yard, until the permanent re-provision of Boundary Hall in Block G in the later phases of the Outline Element. The detailed design of the temporary facility would be addressed through an early RMA, the timing would be controlled by a condition. The use of the temporary space is to be the same as the current Boundary Hall (Use Class F2) and is to be 362 sqm (GIA).
- 5.20 A permanent Gas Governor and associated enclosure is proposed within the public realm on the southern side of the access road along the south of Block N to ensure that existing surrounding homes, continue to receive a gas supply. It will be built as part of the Detailed Element and retained thereafter. The Gas Governor will be contained within metal housing, measuring 2.7m wide by 6m in length to provide a total internal area of 16.2 sqm. It will be 2.15m in height and be enclosed by 2.25m high frame with climbing plants on the outside, which will be along the perimeter of the metal housing maintaining a 3m clearance zone in all directions.

Block K and T and Public Park (Phase 3)

- 5.21 Block K is a perimeter block and is the fourth block proposed to come forward within Phase 3 of the Proposed Development. The block is part 5 -, part 8-, part 10 storeys.
- 5.22 Block K is residential providing 138 homes comprised of 56no. one-bed flats, 31no. two-bed flats, 38no. three-bed flats, 9no. three-bed maisonettes and 4no. four-bed maisonettes. 9 of these units are to be shared equity homes, 5 are to be replacement social rent homes and 124 (90%) are to be social rent uplift homes.
- 5.23 The southern part of the new park (the Meadows, annotated above) will be delivered upon completion of Block K, providing around 3,560sqm of open space (0.3ha). It will provide around 1,950sqm of formally equipped playable space for older children aged 5-11 (0.2ha), with approximately 250sqm attributed to doorstep play for younger children from 0-4 (0.03ha).
- 5.24 Temporary landscape spaces are to be provided during Phase 3, between Blocks K and N, following construction stage to create informal play, amenity lawn and wildflower meadows with ecological interventions until adjacent blocks come forward for development and enable the delivery of the north section of the Meadows Park.

- 5.25 Block T is the fifth block to come forward and is proposed to be delivered as part of Phase 3 alongside Block K. Block T is residential and comprises of ten 3-storey houses and a 5-storey block of flats.
- 5.26 In total, it provides 19 homes comprised of 8no. two-bed flats, 1no. three-bed flat, 4no. three-bed houses, 5no. four-bed houses and 1no. five-bed house. 7 (37%) of these units are to be replacement social homes. The remaining 12 (63%) being social rent uplift homes.

Summary Tables of Detailed Phases (0-3)

Housing by Block – Detailed Element (Units)						
Block	Shared Equity	Social Rent (Replacement)	Social Rent (Uplift)	Shared Ownership	Market Sale	Total
Block A	11	10	18	11	0	50
Block D	41	47	85	47	0	220
Block N	14	57	28	0	49	148
Block K	9	5	124	0	0	138
Block T	0	7	12	0	0	19
Total	75	126	267	58	49	575
Total in Detailed Phases (0-3) 575 units						

Table: Proposed Tenure Mix – Detailed Phases

Block	Non-Residential (Sqm GIA)	
	Commercial/Retail	Community
Block A	0	0
Block D	0	103
Block N	455	0
Block K	0	0
Block T	0	0
Total	455	103
Total: 558sqm		

Table: Proposed commercial floorspace – Detailed Phases

Housing Tenure and Mix - Detailed Element (Units)							
Tenure	1 bed	2 bed	3 bed	4 bed	5 bed	Total	%
Social Rent	133	113	134	11	2	393	68%
Shared Equity	16	29	28	0	2	75	13%
Shared Ownership	19	39	0	0	0	58	10%
Private	25	14	10	0	0	49	9%
Total	193	195	172	11	1	575	100%
%	34%	34%	30%	2%	0%	100%	
Total in Detailed Phases (0-3) 575 units							

Table: Proposed Tenure Mix – Detailed Phases

Outline Proposals – Phases 4-10

- 5.27 The outline element, with All Matters Reserved, has been submitted to establish the principle of the proposed development and allow the necessary flexibility for the development of detailed design as part of a phased delivery across the application site. The outline element comprises 14 development plots.



Outline Blocks – Highlighted in yellow

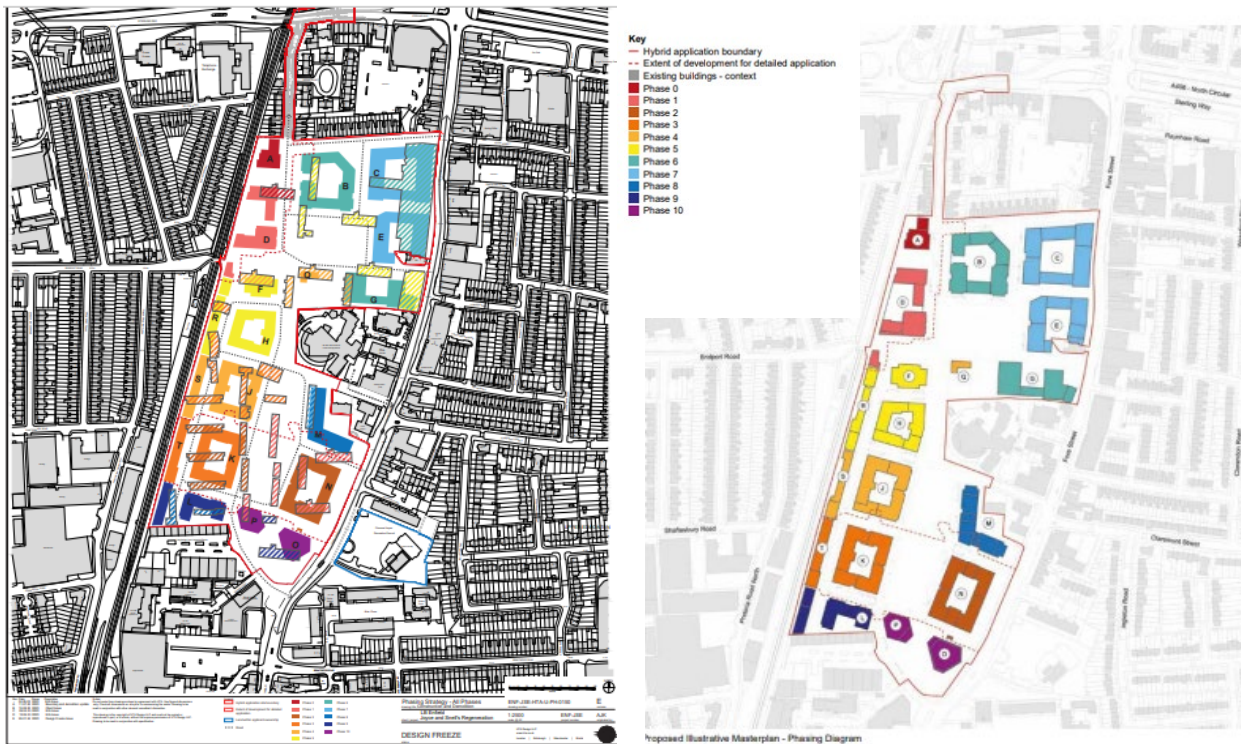


Image: Indicative Phasing Plan (Phases 0-10)

- 5.28 An indicative phasing plan has been submitted with the application. This shows the proposed build sequence throughout the estate redevelopment. Given the length of the proposed development (approximately 23 years), it is acknowledged there is the possibility this may change over time.
- 5.29 A set of parameter plans have been submitted. These seek to establish the key development principles associated with the outline elements of the proposed development including development plots, access, open space and public realm which set the masterplan structure, site levels, building heights and predominant distribution of different land uses at ground and upper floor levels. The parameter plans show the maximum potential scale of development.
- 5.30 The Development Specification, identifies the quantum and type of development to be delivered in the outline, alongside the parameter plans:

Land Use	Class	Minium Sqm	Maximum Sqm
Residential	C3	-	138,000 1,453 units
Basement	C3 (ancillary)	-	1,606
Retail/Commercial (Drinking Establishment)	E (Sui Generis)	2,273 (360)	2,526 (400)
Employment Workspace	E(g)	714	793
Community	F1 & F2	2,369	2,632
Nursery	E(f)	225	250

Table: Summary of proposed land uses in the Outline Element of the Masterplan

- 5.31 Illustrative plans have been submitted that show one way in which the development could be delivered in accordance with the parameter plans. Further details on the final design proposals will come forward as part of Reserved Matters Applications.
- 5.32 A Design Code has also been submitted and updated during the application process that seeks to establish a robust design framework for the proposed development. The Design Code sets out the parameters within which the design of the development, including architectural style and materiality, public realm design, layout and scale will be expected to comply at the Reserved Matters stage. Future Reserved Matters submissions would have to accord with all the aforementioned control documents.

Environmental Statement

- 5.1. In November 2021 AECOM undertook a review of the Environmental Impact Assessment (EIA) Scoping Report for the Proposed Development in order to advise on the adequacy of the scope of the associated EIA (21/03691/SCOP).
- 5.2. The application is supported by an assessment of the environmental impacts arising from the proposed development in the form of an Environmental Statement (ES) submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017). Aecom were instructed to undertake an independent review of the submitted ES chapters.
- 5.3. The ES considers the likely significant effects of the proposed development, as well as the likely significant cumulative effects that may result from the proposed development and other developments in the area. The topics addressed in the ES are:
- Traffic and Transport
 - Noise and Vibration
 - Air Quality
 - Climate Change
 - Wind Microclimate
 - Daylight and Sunlight and Overshadowing
 - Ground Conditions
 - Ecology
 - Historic Environment
 - Socioeconomics
 - Summary of Significant Effect
 - Townscape and Visual Impact Assessment
- 5.4. The findings of the ES Review were presented in the ES Review Report issued by Aecom on 4th November 2022. Responses to the ES Review comments were received from the Applicant during November and December 2022. Aecom reviewed responses and identified whether items were resolved, or further information was required. AECOM's final response was issued on 8th March 2023.
- 5.5. In May 2023 Aecom reviewed a further set of responses provided by the Applicant (referred to the Applicant's 2nd Response). The purpose of this review was to close out comments where appropriate and to identify those comments

which were to be resolved through the provision of further information in an ES Addendum.

- 5.6. In July 2023 the Applicant submitted an ES Addendum and a revised Non-Technical Summary, to present and assess revisions to the design following changes to fire regulations and the requirement for a second staircase, and to address feedback received on the planning application. AECOM carried out a review of the ES Addendum, the results of which are set out in the Joyce and Snells ES Addendum Review, August 2023.
- 5.7. A replacement ES Addendum was submitted in April 2024 and subsequently reviewed by Aecom. The review is to ensure the April 2024 ES Addendum has been prepared in accordance with relevant best practice guidance and adheres to recognised methodologies or suitable variations as well as compliance with the EIA Scoping Opinion.
- 5.8. The findings of the ES review of April 2024 and the revisions that have been made since its original submission, including as clarified, are discussed in the body of this report. There is a clarification in relation to the methodology of population modelling which remain. Members will be updated further at the meeting. Any adverse environmental effects have been identified. Overall, the appropriate matters have been taken into account and if planning permission were to be granted, mitigation measures, where possible, could be secured by planning conditions and/or planning obligations as appropriate and these are identified in the report.

6. Relevant Planning Decisions

Application Site

- 6.1 Land Rear of Wadham House, 12 College Close, London, N18 2XT application 22/03821/PADE for the Demolition of a row of 15 garages to slab level was Granted 06.12.2022
- 6.2 Public Footpath and Land at Eagle Court, 35 Snells Park London, N18, application 23/00097/CEA for Installation of a temporary transforming station was Granted 09.03.2023.
- 6.3 Joyce and Snells Estate, London, N18, application 21/03691/SCOP for request under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for a EIA Scoping Opinion for proposed redevelopment of Joyce Avenue and Snells Park Estate, comprising up to 1,992 (Class C) residential units and a range of Class E uses (retail and employment), Class F2 use (civic/community) and open space was Decision Issued 17.11.2021.
- 6.4 Garages 1 To 15 Rear Of 101-132 Snell's Park Estate, N18 2SY, planning application 21/03375/RE4 for the Temporary change of use of the site to Workspaces (Class E, F2) and Bus Cafe (Class E(b)) involving new roof structures to existing garages and erection of two storey commercial units and erection of new canopy structure to courtyard was Granted 20.12.2021.
- 6.5 Joyce and Snells Estate, London, N18, pre-planning application 16/03203/PREAPP for Proposed redevelopment of sites and erection of 970

residential units (Joyce Avenue site) and erection of 1,010 residential units (Snells Park site) was issued 16.08.2016.

- 6.6 92-342 Joyce Avenue, London, N18, pre-planning application TP/95/1046 for the Alteration to approved layout of 6 garages in connection with residential development granted under planning reference TP95/0103 (Retrospective) was Granted 26.01.1996.

Adjoining Sites

- 6.7 High Road West, N17, planning application reference HGY/2021/3175 for Hybrid Planning application seeking permission for 1) Outline component comprising demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), business (Use Class B2 and B8), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and 2) Detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works (EIA development - ES viewable on Council website & at The Grange N17). 1) Outline: * Demolition of most buildings (with retention of some listed & locally listed heritage assets); * New buildings at a range of heights including tall buildings; * Up to 2,869 new homes in addition to Plot A (including affordable housing); * At least 7,225sqm of commercial, office, retail, & community uses (incl. new library & learning centre); * New public park (min 5,300sqm) & New public square (min 3,500sqm); & * Other landscaped public realm and pedestrian & cycle routes. 2) Detailed: Plot A - Demolition of 100 Whitehall Street & Whitehall & Tenterden Community Centre and erection of new buildings of 5-6 storeys containing 60 new affordable homes & open space was Granted 31/08.2022.
- 6.8 The Goods Yard and the Depot, 36 & 44-52 White Hart Lane and 867-879 High Road (and Land to the rear), Tottenham N17, planning application reference HGY/2021/1771 for the (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use. This proposal is accompanied by an Environmental Statement - Allowed on Appeal dated 24.10.2022.
- 6.9 Upton and Raynham Road, N18, planning application 21/04271/RE4 for the Removal of the Beck House slab and associated ground works on Upton Road and construction of 134 residential dwellings (Use Class C3) and up to 188sqm flexible commercial floorspace (Use Class E) comprising buildings up to 7 storeys in height, and the change of use of ancillary garages to part of lower ground floor of Scott House (Use Class C3) to provide up to 70sqm community hall (Use Class F2(b)), 45sqm ancillary management office (Use Class C3), podium deck, along with associated means of access and highways works; car and cycle parking; hard and soft landscaping; play space and public, communal, and private realm; refuse storage; ancillary plant and structures; and works to Scott House to create new access at lower ground and ground floor levels was Granted on 31.03.2022.

- 6.10 Edmonton Green Shopping Centre and Adjoining Land (bounded By Fore Street/The Broadway, Hertford Road, Monmouth Road and Plevna Road), Enfield, N9, planning application 20/04187/OUT for the HYBRID PLANNING APPLICATION for the following: DETAILED planning application for Phase 1, for the demolition of the existing car park, access road and parking ramp that serves the roof of 1 West Mall, Edmonton, London N9 0AL (Asda) building and structures for erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), residential units (use class C3), infrastructure landscaped amenity space, car parking, cycle parking and associated works; and A phased OUTLINE planning application (Phases 2-4) (all matters reserved) for the balance of the site for: 1. The proposed demolition of buildings and structures; 2. The erection of buildings, including tall buildings, and works of alteration to existing buildings for the following uses: a) Flexible Commercial Floorspace (Use Class E); b) Bars/drinking establishments, Hot Food Takeaways and Leisure Uses (Use Class Sui Generis); c) Covered Market (Use Class E); d) Community and Leisure (Use Classes F1, F2 and Sui Generis); e) Residential Floorspace and the remodelling of existing residential entrance space for Grampian, Mendip and Pennine Houses (Use Class C3); 3. Associated infrastructure; 4. Streets, open spaces, landscaping and public realm; 5. Car, motorcycle and bicycle parking spaces and delivery/servicing spaces; 6. Utilities including electricity substations was Granted on 18.11.2022.
- 6.11 104-110 Fore Street, N18, planning application 20/00804/PRJ for the Change of use of first floor from office (Class B1a) to 8Nos. self-contained residential units (Class C3) was Granted on 15.05.2020.
- 6.12 50 - 56 Fore Street London N18, planning application 20/01742/FUL 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, Resolution to Grant Planning Permission subject to completion of a Section 106 Agreement
- 6.13 79 Fore Street N18, planning application 17/05524/FUL for the Erection of a three-storey rear extension to provide 3 x self-contained flats comprising (1 x 2 bed and 2 x 3 bed involving change of use of 1 residential unit into Office use (A2) together with associated car parking and refuse storage was Refused 13.03.2019. Allowed at Appeal.
- 6.14 1 Grove Street, Enfield N18, planning application TP/06/0397 for the Demolition of existing building and erection of a 4-storey building comprising 24No. one bed flats with front and rear balconies (north and south elevations), Juliet balconies to the side (east and west) elevations, vehicular access to Grove Street and associated covered bicycle storage was Granted on 01.06.2006.
- 6.15 Land West of Meridian Water Station, South of A406, Fore Street, N18, planning application 22/02777/FUL for the Phase 2 Part 1 of new 23km Borough-wide district heating distribution network in Enfield comprising at this stage pipework of approximately 2km in length was Granted on 19.12.2022.

7. Consultations

Pre-Application Consultation

- 7.1. The applicant undertook extensive pre-application consultation and engagement with the local community. This included four public exhibitions from 2017 – 2021 (x2 in person; x2 virtual) leading to a public ballot in December 2021. A resident Steering Group was also established, with all residents invited to join via newsletter which was delivered to all homes. The Group, which has 60 members, first met in 2018 and there have been 17 meetings in total.
- 7.2. In addition, online polls have been run with residents, covering a range of topics. This resulted in information being fed into the design process. The project team also undertook extensive door knocking and telephone calling to provide one to one discussion and all landlord offer documents were hand delivered.
- 7.3. The Estate Ballot in December 2021 resulted in an 85% turnout. In accordance with Mayors Good Practice Guide to Estate Regeneration, development should only proceed with the majority of resident support. 78.5% voted 'yes' for the re-development of the estate.

Tenure	Total Votes	Eligible Votes	Turnout %
Council Tenants	363	427	85
Leaseholders/Freeholders	165	186	88
Housing Association	20	22	90
Temporary Housing Tenants	9	22	40
Totals	557	657	85

- 7.4. Following the positive outcome of the ballot, the applicant carried out further consultation with a variety of stakeholders, including with the wider community and local businesses adjacent to and nearby the estate. This involved both virtual and in person exhibitions held at the Angel Community Centre on the 14th March 2022 and at Boundary Hall on 17th and 19th March 2022.
- 7.5. The submitted Statement of Community Involvement describes the overall consultation and engagement process from 2017 to the present time, setting out the relevant activities and events through the pre-application stage, including pre and post the estate ballot. Themes emerged through the engagement. These related to improved security, green spaces, better and secure parking, sustainable and energy efficient homes and housing need.
- 7.6. The process has been inclusive and extensive and demonstrates that responses have addressed the key issues raised, and a responsive design process with a continued significant level of support for the proposed scheme. This process has been recognised and supported by the GLA.

Enfield Place and Design Quality Panel (DRP):

- 7.7. The proposed development was brought to the Enfield Place and Design Quality Panel (referred to as DRP) on six occasions:
- 26 September 2019;
 - 26 May 2020;

- 20 May 2021;
- 15 September 2021;
- 7 October 2021;
- 21 April 2022.

7.8. A summary of the conclusions made, along with officer comment as to the degree to which the applicant has addressed DRP conclusions from the final DRP on 21 April 2022, which covered the Hybrid Scheme, is outlined below:

- “Overall, the masterplan has come together well. The panel’s comments seek to highlight areas of potential improvement; but the good work that is coming out of the proposals is also acknowledged and applauded.”

Officer comment: Noted

- “Overall, movement, routes and legibility issues have been resolved. The design team could be more ambitious on promoting a modal shift through the street design.”

Officer comment: The Site has a clear east west / north south axis. These provide clear pedestrian and cycle routes through the Site, as well as clear connections to the surrounding footpath road network. The enhancements to open space will make a small qualitative uplift and a considerable improvement to the legibility and permeability of the Site.

The scheme will be providing car parking for existing residents only. As such the proposal is assisting in a modal shift.

- “The aspirations for sustainability and social value, whilst welcome, are still vaguely defined. Whilst understanding that an options appraisal is still ongoing the panel would encourage the design team to commit to ambitious KPIs.”

Officer comment: The proposed energy strategy is in line with the London Plan. The proposed scheme will connect to the Meridian Water District Heat Network (DHN) which is supported and will reduce carbon emissions. The proposal is compliant in terms of biodiversity net gain, Urban Greening Factor, sustainable drainage and would provide 726 new trees.

In addition, the proposal offers, right of return and single decant for existing residents on the estate. The scheme would provide additional housing, community facilities, including a community centre, nursery, an improved and new MUGA, improved integration with the existing school and new and improved connections with the wider environs. Overall, the scheme is considered to deliver a sustainable form of development.

- “Block A is working well to mediate between the homes on College Close and the larger scale to the south.”

Officer comment: Noted. Full consideration is given in the Urban Design section of the report.

- “Block D is an attractive building and piece of townscape with an excellent podium design. There are some concerns about the interaction with the

public realm, quality of accommodation and the pocket park space to the north.”

Officer comment: Full consideration is given in the Urban Design section of the report.

- “Block T is coming together well, and the panel commend Studio Gil on the progress that has been made”.

Officer comment: Full consideration is given in the Urban Design section of the report.

- Block K requires improvement to the appearance, materials and details to create a high-quality building for in a key location fronting the park.”

Officer comment: Full consideration is given in the Urban Design section of the report.

- “Block N is progressing in the right direction, but the panel are concerned about the appearance and detail of the retail units and landscape to Fore Street.”

Officer comment: Full consideration is given in the Urban Design section of the report.

Statutory and Non-Statutory Consultees

External Consultees

7.9. Cadent Gas: No comment. Informative added.

7.10. Environment Agency: No objection, subject to condition on water consumption limits. The Flood Risk Assessment should form an approved document.

Officer comment: Water consumption condition and Flood Risk Assessment as an approved document in the above recommendation.

7.11. Energetik: No objection. The Energy Statement that advises that the development will connect to the decentralised energy network.

Officer comment: confirm connection to DEN forms part of the shadow s106 in the recommendation above.

7.12. Enfield Disablement Association: No comment.

7.13. Historic England: No objection. Suggest Local Planning Authority seeks the views of specialist Conservation and Archaeological advisers.

Officer comment: Enfield’s Conservation Officer has been involved in both pre-application discussions and the assessment of the application. Their specialist input has been taken into account in the assessment of the application, as set out below. This harm to the non-designated and designated heritage assets has been weighed against the public benefits arising from the proposal.

- 7.14. Historic England (GLAAS): No objection, subject to conditions.

Officer comment: confirm conditions included in the recommendation above.

- 7.15. Greater London Authority (Mayor):

Estate Regeneration

The scheme would provide a significant overall net increase in social rent accommodation. Other key principles set out in the London Plan and the Mayor's Good Practice Guide to Estate Regeneration would be met in terms of the right to remain, a fair deal for leaseholders and public consultation and engagement. The phased demolition and comprehensive redevelopment of the estate can therefore be supported.

Officer comment: the phasing plan is secured via condition. The level of affordable housing to ensure decant is secured as part of the shadow s106.

Land Use Principles

Residential-led mixed use redevelopment of the site is supported. The quantum and spatial distribution of commercial and employment workspace use is acceptable. The approach to the phasing and reprovision of social infrastructure is acceptable and should be secured.

Officer comment: Social infrastructure is secured via minimum floorspace set out on the parameter plans. A continuity plan is also secured in the s106 to ensure no temporary loss of social infrastructure. A grantian condition is also recommended prior to demolition of Boundary Hall to ensure meanwhile facilities are provided.

Housing and Affordable Housing

The proposed affordable housing represents 53% of the total housing proposed by habitable room (49% by unit), of which, 68% is social rent. The applicant's FVA is currently being scrutinised by GLA officers to ensure this provides the maximum viable amount of affordable housing. Early, mid and late-stage viability review mechanisms are required.

Officer comment: Independent review of the applicants FVA concludes 53% (based on hab. room) is the maximum affordable housing proposal the scheme can currently offer. Review mechanisms, early, mid and late-stage viability reviews are secured in the shadow s106.

Urban Design

The design, layout and landscaping of the scheme is strongly supported. The architectural and materials quality and residential quality would be of a high standard. Tall buildings are proposed in a location which is not identified as suitable for tall buildings in Enfield's adopted Local Plan, so the application does not meet the locational / plan-led criteria in the London Plan. However, the visual, functional, environmental and cumulative impact of the tall buildings is considered to be acceptable in this instance.

Officer comment: these are discussed in further detail, in the body of the report.

Heritage

The application would cause a low level of less than substantial harm to heritage assets along Fore Street and High Road. This harm could be clearly outweighed by the significant public benefits associated with the development.

Officer comment: the level of harm is weighed against the benefits of the proposal and in the planning balance.

Transport

The trip generation assessment should be revised to confirm the impact on the capacity of Silver Street Station and bus services. Once the revised assessment has been agreed, financial contributions will be required to mitigate the impact of the scheme which should be secured via s106 agreement. In addition, further discussion is required in relation to the proposed new crossing of the A406 North Circular Road and modelling undertaken to support this.

Officer comment: TfL have confirmed they are satisfied with the applicant methodology and confirm there are no impacts on transport infrastructure including the rail, road and bus network. Financial contributions have been agreed for signalised crossing over the A406 and will be secured in the shadow s106.

Climate Change

The energy strategy is supported and is in line with the London Plan. Connection of the scheme to the Meridian Water District Heat Network (DHN) is proposed, which is supported in line with the London Plan heat hierarchy and should be secured. Further information on the connection to the DHN is required to set out the feasibility, network capacity and delivery timescales.

Officer comment: Energetik have confirmed there is sufficient capacity for future connection to the DEN. The future connect to the DEN is secured via the shadow 106.

Urban Greening

The urban greening strategy is supported and is in line with the London Plan. The tree retention strategy is acceptable, and the loss of trees has been justified and would be mitigated appropriately via the proposed replanting.

Officer comment: Recommended conditions to ensure the future of retained trees during construction and details of new trees to be provided in landscaping condition.

Other environmental issues

The approach to air quality and noise issues is acceptable. However, further information is required to demonstrate that the application would meet the air quality positive criteria, in accordance with London Plan Policy SI1.

Officer comment: An ES addendum has been submitted. The Environmental Health Officer has raised no objections to air quality.

- 7.16. Transport for London: No objection, subject to Sterling Way/College Close junction crossing funding (50% by the applicant) secured.

Officer Comment: match funding will be secured in the Shadow s106 and paid in two instalments in detailed phases.

- 7.17. London Fire Brigade: No comment.
- 7.18. London Borough of Haringey: No comment.
- 7.19. Metropolitan Police (Secured by Design): No objection, subject to condition on Secure by Design.

Officer comment: Conditions have been included as per the recommendation above and use of community space in Block G for use by the Met Police.

- 7.20. Natural England: satisfied with the SAMM and SANG mitigation measures proposed, subject to mitigation measures secured.

Officer Comment: The measures identified within the Habitat Regulations Assessment are to be secured via planning obligation. £450,000 enhancements to the Pymmes park trail and SAMMs contributions are to be secured in the shadow s106.

- 7.21. Network Rail: No objection. Informative recommended.

- 7.22. NHS - London Healthy Urban Development Unit (HUDU): identify the need for mitigation to be secured through the S106 agreement to enable expansion of the capacity of health infrastructure within the vicinity of the Site. A request has been made for a contribution of £2,719,401. The timing of the contribution would allow the Integrated Care Board to deliver the capacity alongside the new population.

Officer Comment: The shadow s106 secures the capital payment at the point of population uplift (Phase 5).

- 7.23. Sport England: the development is likely to generate a future demand. On this basis, consideration should be given by the Council for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement.

The potential users of the proposed MUGA should be engaged throughout the design process so that the proposed MUGA would reflect their needs and align with Sport England's *Design Guidance Note "Artificial Surfaces for Outdoor Sport"*.

Sport England also recommend that the applicant considers installing sports lighting or ducting to allow the retrospective installation of sports lighting.

Officer comment: £500,000 has been secured for offsite improvements to Florence Hayes recreation ground and Pymmes Park for sports and recreation in the vicinity of the development. This will be secured in the shadow s106.

- 7.24. Twentieth Century Society: Objection. Loss of the existing estate and loss of embodied carbon due to demolition.

Officer comment: the loss of the non-designated heritage asset would cause harm and the loss in significance has been weighed against the benefits of the proposal. Conditions and obligations have been secured to ensure Whole Life Carbon, carbon off setting and sustainability measures to offset the loss of embodied carbon.

- 7.25. Thames Water/water sewage undertakers: No objection, subject to conditions.

Officer comment: confirm conditions are included in the recommendation above.

- 7.26. Health and Safety Executive: No objection subject to condition requiring the submission of a satisfactory fire statement with any reserved matters application, and that HSE (Planning Gateway One) is consulted in conjunction with the Local Planning Authority's consideration of any reserved matters application.

- 7.27. Officer comment: Second stairs have been introduced in all blocks over 18m in the detailed phases. A condition is recommended to ensure the detailed element is carried out in accordance with approved fire statement and for the submission of a fire statement on reserved matters applications. Consultation will occur with HSE on any buildings over 18m at a future date.

- 7.28. REACT: request confirmation of where the notice board is to be relocated.

Officer comment: This is to be included as part of Grampian condition for the reprovision of Boundary Hall, prior to the demolition of the existing building.

- 7.29. Secretary of State: SoS notified as the scheme is EIA development. No comment.

- 7.30. UK Power Networks: No objection. Informative recommended.

Internal Consultees

- 7.31. Building Control Officer: No comment.

- 7.32. HASC Health: No comment.

- 7.33. Urban Design: There has been significant involvement with the pre-application process, DRP and other relevant stakeholders. A street-based approach with perimeter blocks creates a legible, human scaled proposal with a strong public front and secure private amenity. Heights and massing across the site are carefully distributed to avoid undue impact on Fore Street whilst marking key nodes in the development and the gateway to the site. These buildings are not overly tall and where height is used it is strategically placed using buildings of a high-quality design. There is concern over the level of detail on the materials. On balance, the development is a high-quality development.

Officer response: A condition will be imposed requiring details of materials to be submitted to ensure the development is of a high quality. The TVIA and CGIs demonstrate the detailed buildings to be of high quality. Architect retention is to be secured in the shadow s106 to ensure the development is of high quality.

- 7.34. Conservation Officer: The proposal will result in total loss in significance of the Joyce and Snell estate. To non-designated heritage assets outside the site the proposals will result in neutral to moderate harm. The proposal will result in less than substantial harm to the significance of designate heritage assets (listed building and conservation area). Enhancement works would reduce the harm caused and/or result in heritage benefits. Enhancement works are recommended to be secured through conditions and shadow S106 Agreement.

Officer comment: The less than substantial harm identified is weighed against the benefits of the application, noting that considerable importance and weight should be attached to this harm. Enhancements are recommended to be secured via the shadow s106, including Fore Street public realm/heritage improvements.

- 7.35. Employment and Skills: Require commitments to apprenticeship places and minimum request on local labour and local spend on materials with scope to review and revisit phase by phase.

Officer comment: The shadow s106 is to secure these measures.

- 7.36. Education: Phases 0 to 3 would have a minimal impact on local schools and do not require S106 contributions at this stage. The timing of the financial contribution in the later phases is to ensure delivery of capacity alongside the new population and is subject to review.

Officer comment: Following the Education review assessment, a sum of £223,080 is required for SEND provision at the point of population uplift. This being £2,535 per identified additional pupil place for future outline phases, if required, and will be secured via shadow s106.

- 7.37. Parks: No comment.

- 7.38. Landscape and Public Realm: No comment.

- 7.39. Regeneration Leisure and Culture: No comment.

- 7.40. Environmental Health: No objection. There is unlikely to be a negative environmental impact, subject to conditions.

Officer comment: Conditions recommended are included in the recommendation above relating to ground contamination, remediation strategy and verification report, unidentified contamination, non-road mobile machinery, CEMP, sound insulation, acoustic report.

- 7.41. Traffic and Transportation: No objection subject to recommendations in shadow 106 for contributions, including CPZ, Travel Plan Monitoring and sustainable transport measures.

Officer comment: mitigation measures are to be secured in shadow s106 and conditions are recommended.

- 7.42. Trees: No objection, subject tree protection and high-quality landscape scheme.

Officer comment: conditions will be recommended.

- 7.43. Biodiversity Officer: No objection subject to conditions relating to biological enhancement, landscaping and CEMP.

Officer comment: conditions will be recommended.

- 7.44. SuDS Highways: No objection subject to conditions relating drainage strategy, verification and ground water monitoring.

Officer comment: conditions will be recommended.

- 7.45. Highways Services: Objection. The use of 450 x 450 modular paving slabs is not acceptable to Highways on public adopted footpaths. Need to be changed to slabs 600mm x 750mm laid in a staggered bond. Alternatively block paving or asphalt are acceptable.

Officer comment: the applicant has confirmed the use of appropriate slabs and details will to be secured by condition.

- 7.46. Highways Improvements: No comment.

- 7.47. Highways Landscaping: No comment.

- 7.48. Climate and Sustainability Officer: No objection subject to payment of a Carbon Offsetting for Detailed Phases and future phases all to be secured in shadow s106.

Officer comment: A £153,457 carbon offset sum will be secured in shadow s106. Future phases will be required to submit an Energy Statement.

- 7.49. Property Services: No comments.

- 7.50. Commercial Waste Management: No comments.

Public Consultation

- 7.51. Public consultation of this planning application involved notification letters being sent to 2,962 neighbouring properties (both within the estate and homes and businesses adjoining) on 11 October 2022. A press advert in the Enfield Independent was published 12 October 2022 and 20 site notices were erected on 13 October 2022. An additional printed copy of the Environmental Statement was placed at Fore Street Living Room Library and Enfield Town Library.

- 7.52. Amendments to the application were received on 17th July 2023. These changes were considered material to the scheme. As a result, a further period of consultation was carried out. Public reconsultation involved notification letters being sent to 2,962 neighbouring properties (both within the estate and homes adjoining) on 19th July 2023. A press advert in the Enfield Independent was published 19th July 2023 and 20 site notices were erected 20th July 2023.

- 7.53. Further amendments to the application were received on 11th April 2024. These changes were considered material to the scheme. As a result, a further period of consultation was carried out. Public reconsultation involved notification letters being sent to 2,962 neighbouring properties (both within the estate and homes adjoining) on 23rd April 2024. A press advert in the Enfield Independent was published 24th April 2024 and 20 site notices were erected 24th April 2024.

- 7.54. Overall, as a result of public consultation on the application, 8 (eight) representation were received, and a summary of reasons for comment is below:

- *Consultation*
Not enough dialogue with residents

- *Housing*

Loss of existing homes
Locals will not be able to afford homes
Doubling of the number of residents
Existing properties undervalued

- *Social Infrastructure*

Provision of no additional infrastructure
Lack of leisure facilities
Lack of green space within the development
No youth centre provided
Lack of health facilities within the development

- *Environmental Health*

Impacts on air quality
Quality of life will not be enhanced

- *Phasing and Construction*

More solidly built blocks are to be knocked down before less adequately maintained ones
Demolition from buildings will have an impact on public health

- *Transport*

Bus journey times will be delayed
Northbound bus lane should end at Colyton Way to allow longer flare to junction
Increase in traffic
SCOOT Traffic light system should be implemented
Loading bays sited that prevent functioning of the bus lane
Investment in additional enforcement cameras
Should provide a crossing at College Close to silver Street Station
Step free access should be provided at Silver Street Station

- *Development at adjoining sites*

The proposals to develop the site to 18 storeys is appropriate
Further detailed applications should respond positively to adjoining sites
The development should not prejudice adjoining site to Langehedge Lane
Noise should be appropriately managed to not have an adverse impact on adjoining sites – agent of change
The council should clarify the indicative road to the north

- *Other Matters*

Redevelopment should be sited elsewhere in the borough
Potential for antisocial behaviour to proposed public spaces
Impact on railway line

7.55 A representation was received from the Post Office and can be summarised below:

- *Loss of Post Office*

Proposed demolition and loss of Post Office
No replacement facility for Post Office to be provided

Officer comment: Block N is providing 455sqm of commercial floorspace in Phase 2. This is prior to the redevelopment of the section of the high street

(Phases 6 and 7). This therefore allows the Post Office the option to relocate and continuity in the provision of its services.

8. Relevant Policy

National Planning Policy Framework 2023

- 8.1. The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 8.2. The NPPF recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 8.3. In relation to achieving appropriate densities paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.

- 8.4. Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.
- 8.5. The NPPF sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:
- “(c) approving development proposals that accord with an up-to-date development plan without delay; or
- (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:
- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed); or
- (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.6. Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where: (a) the local planning authority cannot demonstrate a five year supply (or a four year supply, if applicable, as set out in paragraph 226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.”
- 8.7. The Council’s recent housing delivery has been below the 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. The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the NPPF. It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.9. Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.10. In the period 2019/20 to 2021/2022, the Council has met 73% of its housing target delivering 995 homes in 2021/22. This is an improvement on the previous

year (847 completions) despite challenging market conditions. However, as delivery across three years is 73% of the Government's requirement, the Council is placed in the 'presumption' category. This requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5-year housing land supply which is monitored through the Annual Monitoring Report.

8.11. This is referred to as the "tilted balance" and the NPPF states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

8.12. The London Plan 2021

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
SD1	Opportunity Areas
SD6	Town centres and high streets
SD8	Town centre network
SD10	Strategic and local regeneration
D1	London's form, character and capacity for growth
D2	Infrastructure Requirements for Sustainable Densities
D3	Optimising Site Capacity through the Design-Led Approach
D4	Delivering Good Design
D5	Inclusive Design
D6	Housing Quality and Standards
D7	Accessible Housing
D8	Public Realm
D9	Tall Buildings
D10	Basement development
D11	Safety, Security and Resilience to Emergency
D12	Fire Safety
D14	Noise
H1	Increasing Housing Supply (*):
H4	Delivering Affordable Housing
H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H8	Loss of existing housing and estate redevelopment
H10	Housing Size Mix
S1	Developing London's social infrastructure
S2	Health and social care facilities
S3	Education and childcare facilities
S4	Play and Informal Recreation

S5	Sport and recreation facilities
E3	Affordable Workspace
E11	Skills and opportunities for all
HC1	Heritage Conservation and Growth
HC3	Strategic and Local Views
H7	Protecting public Houses
G1	Green Infrastructure
G4	Open Space
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodland
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI4	Managing Heat Risk
SI5	Water Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy
SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
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
T6.3	Retail 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

8.13. Mayoral Supplementary Guidance

- 8.14. Play and Informal Recreation (September 2012)
Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.
- 8.15. Sustainable Design and Construction (April 2014)
Seeks to design and construct new development in ways that contribute to sustainable development.
- 8.16. The Control of Dust and Emissions during Construction and Demolition (July 2014). The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, from construction and demolition activities in London.
- 8.17. Shaping Neighbourhoods: Character and Context SPG (2014)
Sets out the process of change which is brought about in a way which is responsive to individual places and locations.
- 8.18. Accessible London: Achieving an Inclusive Environment (October 2014)
The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.

- 8.19. Social Infrastructure SPG (2015)
Sets out the need for planning across services to ensure social infrastructure meets the broader built environment aims of the London Plan.
- 8.20. Housing (March 2016)
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.
- 8.21. Affordable Housing and Viability (August 2017)
Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.
- 8.22. Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration (February 2018)
Sets out the Mayor's policies for Estate Regeneration.
- 8.23. Cross Rail Funding SPG (March 2016)
Supports London Plan policies dealing with the funding of Crossrail and other strategically important transport infrastructure.
- 8.24. Be Seen Energy monitoring (September 2021)
To understand a buildings actual operational energy performance and work towards bridging the 'performance gap' between design theory and actual energy use.
- 8.25. Circular economy statement (March 2022)
Sets out circular economy principles at the heart of designing new buildings, requiring buildings that can more easily be dismantled and adapted over their lifetime.
- 8.26. Energy Planning Guidance (2020)
To demonstrate that the proposed climate mitigation measures comply with the London Plan.
- 8.27. Whole life cycle LPG (March 2022)
To provide a buildings carbon impact on the environment and carbon emissions resulting from the materials, construction, and the use of a building over its entire life, including its demolition and disposal.
- 8.28. Local Plan – Core Strategy
- | | |
|----------------|--------------------------------------------------------------------|
| Core Policy 3 | Affordable Housing |
| Core Policy 4 | Housing quality |
| Core Policy 5 | Housing types |
| Core Policy 7 | Health and Social care facilities and wider determinants of health |
| Core Policy 8 | Education |
| Core Policy 9 | Supporting Community Cohesion |
| Core Policy 11 | Recreation, leisure, culture and arts |
| Core Policy 13 | Promoting economic prosperity |
| Core Policy 16 | Taking part in economic success and improving skills |
| Core Policy 17 | Town centres |
| Core Policy 18 | Delivering shopping provision across Enfield |
| Core Policy 20 | Sustainable Energy use and energy infrastructure |

Core Policy 21	Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 22	Delivering sustainable waste management
Core Policy 24	The road network
Core Policy 25	Pedestrians and cyclists
Core Policy 26	Public Transport
Core Policy 28	Managing flood risk through development
Core Policy 29	Flood Management Infrastructure
Core Policy 30	Maintaining and improving the quality of the built and open environment
Core Policy 31	Built and landscape heritage
Core Policy 32	Pollution
Core Policy 34	Parks, Playing Fields and Other Open Spaces
Core Policy 35	Lee Valley Regional Park and waterways
Core Policy 36	Biodiversity
Core Policy 39	Edmonton

8.29. Local Plan – Development Management Document

DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More
DMD3: Providing a Mix of Different Sized Homes
DMD4: Loss of Existing Residential Units
DMD6: Residential Character
DMD8: General Standards for New Residential Development
DMD9: Amenity Space
DMD10: Distancing
DMD15: Specialist Housing Accommodation
DMD16: Provision of New Community Facilities
DMD17: Protection of Community Facilities
DMD18: Early Years Provision
DMD25: Location for New Retail, Leisure and Office Development
DMD27: Angel Edmonton, Edmonton Green, Southgate Green and Palmers Green District Centres
DMD28: Large Local Centres, Small Local Centres and Local Parades
DMD32 Managing Impact of Food and Drink Establishments
DMD37: Achieving High Quality and Design-Led Development
DMD38: Design Process
DMD39: The Design of Business Premises
DMD40: Ground Floor Frontages
DMD41: Advertisements
DMD42: Design of Civic/Public Buildings and Institutions
DMD43: Tall Buildings
DMD44: Conserving and Enhancing Heritage Assets
DMD45: Parking Standards and Layout
DMD47: New Road, Access and Servicing
DMD48: Transport Assessments
DMD49: Sustainable Design and Construction Statements
DMD50: Environmental Assessments Method
DMD51: Energy Efficiency Standards
DMD52: Decentralized energy networks
DMD53: Low and Zero Carbon Technology
DMD55: Use of Roofspace/ Vertical Surfaces
DMD56: Heating and Cooling
DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement

DMD58: Water Efficiency
DMD59: Avoiding and Reducing Flood Risk
DND60: Assessing Flood Risk
DMD61: Managing surface water
DMD62: Flood Control and Mitigation Measures
DMD64: Pollution Control and Assessment
DMD65: Air Quality
DMD68: Noise
DMD69: Light Pollution
DMD70: Water Quality
DMD71: Protection and Enhancement of Open Space
DMD72: Open Space Provision
DMD73: Child Play Space
DMD78: Nature conservation
DMD79: Ecological Enhancements
DMD80: Trees on development sites
DMD81: Landscaping

8.30. Other Material Considerations

National Planning Practice Guidance
National Design Guide (2019)

GLA: Fire Safety LPG (draft)
GLA: Characterisation and Growth Strategy LPG (draft)
GLA: Housing Design Standards (draft)
GLA: Optimising Site Capacity: A Design-led Approach LPG (draft)
GLA: Urban Greening Factor (draft)
GLA: Air Quality positive (draft)
GLA: Air Quality neutral (draft)
GLA: Sustainable Transport, Walking and Cycling (draft)
GLA: Threshold Approach to Affordable Housing on Public Land (2018) –
Practice Note

Enfield Climate Action Plan (2020)
Enfield Housing and Growth Strategy (2020)
Enfield Intermediate Housing Policy (2020)
Enfield Biodiversity Action Plan
Enfield Characterisation Study (2011)
Enfield Local Heritage List (May 2018)
Enfield S106 SPD (2016)
Enfield Decentralised Energy Network Technical Specification SPD (2015)
Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
The Setting of Heritage Assets – Historic Environment Good Practice Advice in
Planning: 3, Historic England (2017)
TfL London Cycle Design Standards (2014)
Mayor's Transport Strategy (2018)
Healthy Streets for London (2017)

8.31. Enfield Draft New Local Plan and Draft Proposals Map

8.32. The New Enfield Local Plan (ELP) was published at Regulation 19 Stage between 28 March and 28 May 2024. The Enfield Local Plan is at an advanced stage of preparation and is considered by the Council to be sound and will not be modified significantly prior to examination.

- 8.33. The NPPF Paragraph 48 states that decision-makers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the London Plan and the NPPF . As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight. At this stage, it has relatively little weight in the decision-making process.
- 8.34. It is not yet known whether the Council will submit the ELP for examination, but it is possible that more than limited weight could be given to a policy or group of policies if it were clear (i) that they are consistent with the NPPF and (ii) that there is no objection to them (in relation to the parts of the policies relevant for the decision).
- 8.35. However, if there are substantial objections to any policy then it would be unlikely that the Council could justify giving it more than limited weight.
- 8.36. Key local emerging policies from the plan are listed below:

Policy DM SE2 – Sustainable design and construction
Policy DM SE4 – Reducing energy demand
Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
Policy DM SE7 – Climate change adaptation and managing heat risk
Policy DM SE8 – Managing flood risk
Policy DM SE10 – Sustainable drainage systems
Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
Policy DM BG8 – Urban greening and biophilic principles
Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
Policy DM DE2 – Design process and design review panel
Policy DM DE6 – Tall buildings
Policy DM DE7 – Creating liveable, inclusive and quality public realm
Policy DM DE10 Conserving and enhancing heritage assets
Policy DM DE11 – Landscape design
Policy DM DE13 – Housing standards and design
Policy DM H2 – Affordable housing
Policy DM H3 – Housing mix and type
Policy DM T2 – Making active travel the natural choice
Policy SA15 - Draft Site Allocation
Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

First Homes

- 8.37. On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this application, the WMS has been taken into account as a material consideration when considering this report and the officer's recommendation.

ANALYSIS

9. Main Planning Issues

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

- Principle of Estate Regeneration
- Land Use Principles
- Housing and Affordable Housing
- Design and Townscape
- Heritage and Conservation
- Residential Quality and Amenity
- Impact on Neighbouring Residential Amenity
- Open Space, Landscaping and Trees
- Habitat Regulations Assessment
- Biodiversity and Ecology
- Transport, Access and Parking
- Sustainability and Climate Change
- Noise and Air Quality
- Waste and Recycling
- Contaminated Land
- Fire Safety
- Flood Risk and Drainage
- Basement Development
- Socioeconomics and Health
- Wind and Microclimate
- Security and Safety
- Public Sector Equality Duty
- Section 106 and Community Infrastructure Levy

10. Principle of Estate Regeneration

10.1. The regeneration of the estate and the Council's re-housing strategy is to be based upon the principles set out within the Mayor's Good Practice Guide to Estate Regeneration (2018). These state, all estate regeneration schemes in London which involve the demolition of existing homes should provide:

- Like for like replacement of existing affordable housing floorspace
- An increase in affordable housing
- Full rights of return for any social housing tenants
- Fair deal for leaseholders/freeholders

10.2. Guidance on the regeneration of housing estates is contained within Policy H8 of the London Plan. This policy advises that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. It is recognised the redevelopment and intensification of existing housing estates play an important role in London.

10.3. The scheme would provide a significant net increase in the overall provision of social rented accommodation in terms of homes (no.191 social rented homes) and habitable rooms (no. 861 hab. rooms) across the site.

- 10.4. This is acceptable and complies with London Plan Policy H8 (Loss of existing housing and estate redevelopment). Amongst other things, this policy sets out the appropriate approach to estate redevelopment.

Fair deal for Leaseholders

- 10.5. The applicant carried out a ballot which was undertaken by an independent body, in line with the Mayor's Good Practice Guide to Estate Regeneration (GPGER) GLA funding guidelines. Residents voted 78.5% "yes" in favour of the regeneration proposals, with a turnout rate of 85.5%. This is supported and accords with the GPGER.
- 10.6. The applicant's Landlord offer sets out the principle that all existing secure tenants will be offered the right to remain with social rents provided with long-term secure tenancies on the same terms as they currently have. Households who are required to downsize would be provided with a home to match their occupancy needs. Also, any over occupied home has the option of a larger dwelling.
- 10.7. Of the 361 existing private tenure homes within the estate, 153 are resident owner occupied. The remaining 208 are non-resident occupied and let out to private tenants. The applicant's Landlord Offer sets out the commitment to ensure fair compensation for resident leaseholders on the site through independent market valuation with an additional 10% compensation, plus all reasonable legal and moving costs paid. Resident leaseholders would also be offered the opportunity to purchase a home within the redeveloped estate via either affordable shared ownership housing or a shared equity home. The scheme proposes a total of 125 shared equity homes. 75 of these homes would be in the Detailed Phases 0 to 3.
- 10.8. Residents who wish to move off the estate will receive compensation which will cover the reasonable cost of moving into their new home and specialist support from the Council's Leasehold Buyback Team, who will guide them through the process of identifying and purchasing their new home. The Council will retain ownership of the replacement and additional new homes for Council tenants. The overall approach to existing leaseholders and residents on the estate is supported and accords with the Mayor's GPGER.

Full and Transparent Consultation

- 10.9. Consultation and engagement with residents on potential options for regeneration/re-development began in 2017. This involved showcasing different approaches for the estate to deliver the required volume of housing, including full redevelopment, partial redevelopment, and infill development. The following activities took place during this period:
- Series of workshops to explore regeneration principles
 - Estate walkabouts with architects to identify issues
 - Site visits to other schemes
 - Letter drops
- 10.10. The responses were monitored by the applicant and the majority of residents consulted supported the full redevelopment approach.

- 10.11. The estate is predominately made up of social housing stock although does contain a portion of leasehold and freehold properties, housing association and private tenants as well as those in temporary accommodation. As such the proposals had to be put to an estate ballot. This is so residents could determine the future of their estate and so the Applicant could secure GLA funding, under guidance set out in the Mayor's GPGER, in July 2018.
- 10.12. The ballot was held in December 2021. 78.5% of voters, voted in favour of the redevelopment of the estate, with a turnout of 85.5%. This represents a strong mandate for the redevelopment of the estate and the proposed scheme. It represents one of the strongest residents' ballot results in London. Following the ballot, the ongoing consultation was expanded to include both residents of the estate and the wider residential and business community. Details of this are set out in the Statement of Community Involvement and Design and Access Statement, submitted with the application.
- 10.13. The approach to public consultation and engagement is considered acceptable and has involved meaningful and proactive engagement and feedback from residents in the consideration of options, design development and as part of the ballot undertaken in 2021.
- 10.14. The applicant has demonstrated that a thorough, inclusive and well-considered approach to consultation and engagement with the local community. The process has enabled greater involvement and co-ordination and has positively informed the proposed scheme of re-development. This approach is therefore acceptable and accords with the expectations set out in the Mayor's GPGER.

Consideration of Alternative Options

- 10.15. London Plan Policy H8 states, that before considering demolition of existing estates, alternative options should first be considered, and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts.
- 10.16. Feasibility studies were undertaken to consider potential options for the redevelopment of the estate. These options included infill development, partial redevelopment or full demolition and redevelopment.
- 10.17. The Council has identified several significant issues which have driven the proposals for comprehensive phased demolition and redevelopment. This includes the outdated design and layout of the estate which is lacking in legibility and poorly connected to its surroundings. The layout of blocks has resulted in poorly defined areas of public open space, movement routes and surface car parking which lack natural surveillance. The areas of public open space are not fully optimised in terms of their use and function. It is reported a number of the blocks have recurring maintenance issues and require substantial investment to bring properties up to modern standards. In addition, the internal residential homes and communal areas are dated and do not meet modern standards in terms of insulation, energy efficiency and private outdoor space.
- 10.18. The latter option for full demolition was preferred by the majority of residents. This allowed for the most comprehensive approach to be undertaken in addressing the issues highlighted above and also help to maximise the overall housing, regeneration, connectivity, public realm and place making benefits. The

site is proposed Site Allocation (SA15) in the Draft Enfield Local Plan for comprehensive redevelopment for residential uses and supporting social infrastructure. Whilst this policy and policy document is of little weight at present, given its stage in the adoption process, it does represent a direction of travel.

- 10.19. The applicants proposed scheme is based upon three key design concepts:
- To create a landscape-led masterplan with an ecological spine, for the benefit of people and nature.
 - To encourage strong communities through the creation of a range of spaces that improve resident needs.
 - A pedestrian focus on connecting the estate into the wider context, making an accessible place for all.
- 10.20. The Masterplan has sought to apply these concepts by providing a central civic and community hub, a public square, two news parks as well as landscaped courtyards and pocket parks and a central green spine along with improved north- south and east-west connectivity.
- 10.21. Officers agree that in this instance, the proposal for comprehensive redevelopment is appropriate, particularly noting the inherent problems which currently exist and strong mitigation by the phased, single decant approach proposed for existing residents, which would minimise disruption and seeks to retain households on the site as it is redeveloped.

Summary of Estate Regeneration

- 10.22. The proposals would ensure the like for like replacement of existing affordable housing floorspace, with a significant overall net increase (191 homes) in social rent accommodation. Other key principles set out in the London Plan and the Mayor's Good Practice Guide to Estate Regeneration would be met in terms of the right to remain, a fair deal for leaseholders and in relation to public consultation and engagement and exploration of alternatives for the redevelopment of the estate.
- 10.23. The Council has identified the Site as a flagship project of their house building programme and wider commitment to the regeneration of the Edmonton area, including Upper Edmonton, to provide a better, safer and sustainable neighbourhood. The comprehensive regeneration of the Site is proposed to be pivotal to this transformation and provide a significant component in meeting the housing delivery needs of the Borough and over the Plan period.
- 10.24. The phased demolition and comprehensive redevelopment of the estate is therefore to be supported and is in accordance with London Plan Policy H8 and the Mayor's GPGER.

11. Land Use Principles

Housing

- 11.1. The London Plan (LP) supports the building of more homes through Policy GG4. This policy promotes the delivery of genuinely affordable homes and the creation of mixed and inclusive communities, with good quality homes that meet high standards. Policy GG2 requires development proposals to make the best

use of land by enabling development on brownfield land well-connected by public transport and by applying a design-led approach to determine the optimum development capacity of sites.

- 11.2. The LP also supports increasing housing supply and optimising housing potential through Policy H1, which states that the potential for housing delivery on all suitable and available brownfield sites should be optimised.
- 11.3. The LP Policy H1 sets a London wide 10-year housing target for 522,870 net additional homes to be completed by 2029, with Enfield set a 10-year target of 12,460 new homes during this period. The proposals would result in a significant net increase of 1,233 additional homes (2,028 less 795 existing homes). This equates to approximately 10% of Enfield's 10-year housing target.
- 11.4. Enfield's Core Strategy (CS) (adopted 2010) supports the provision of high quality, inclusive and affordable homes, seeking to meet and exceed the borough housing targets (set by the Mayor of London).
- 11.5. The Enfield Draft Local Plan includes the Site within the Angel Edmonton Urban Placemaking Area, led by draft Strategic Policy SP PL4: Angel Edmonton. This sets out the aspirations for the area, including an offer of a range of housing typologies and the potential for denser forms of residential growth. The Site forms the majority of draft Site Allocation 15 (SA15) in the draft Policies Map, which is in consultation alongside the draft Local Plan. This estimates a net housing capacity of 1,217 homes for the entire Site Allocation. Although of limited weight at this stage, the draft allocation supports comprehensive redevelopment for residential uses and supporting infrastructure and the proposed 2,028 residential units as part of this application are considered proportionate to the area of the Site Allocation, that the Site comprises.
- 11.6. Enfield Housing's Trajectory Report 2019 shows that during the preceding 7-years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with 51% of approvals over the preceding 3-years having been implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 11.7. It is clear there is an identified need for additional housing and, in particular, affordable housing. The proposal for 2,028 affordable and market homes accords with London Plan Policy GG2, which advocates making the best use of land and building to suitable densities on well-connected sites. The aim to strengthen the provision of housing on a site that is already residential, and is within a residential setting, is supported. The proposal seeks to extend the provision of housing by making more efficient use of land and providing high quality of homes where the existing building no longer presents an optimal housing offer.
- 11.8. Reviewed against strategic policies of the Development Plan and emerging Local Plan policies, the principle of residential housing at this Site is supported. The residential-led regeneration of the Site would make a substantial contribution towards meeting local and strategic housing targets and is strongly supported, in accordance with London Plan Policy H1, which seeks to increase

housing supply by optimising the potential for housing delivery on suitable brownfield sites.

Non-Residential Uses

11.9. Currently, there is approximately 5,164 sqm of civic and commercial uses within the site boundary. Within units fronting Fore Street there is 3,108 sqm of retail floorspace, located within the district centre boundary. The commercial and civic uses also include Fore Street Library as well as a pharmacy, dental practice, opticians and post office and a range of independent commercial retail uses which serve the existing community.

11.10. The proposed development includes employment, nursery, civic and retail floorspace uses. The proposed non-residential floorspace (ie retail, employment, community, leisure) represents an overall uplift of floorspace by 1,595 sqm to 6,759 sqm. The relevant Use Class and uplift in floorspace (sqm) are set out in the table below:

Existing Use	Existing Floorspace (sqm)	Proposed Floorspace (sqm)	Difference (sqm)	Outline Element	Detailed Element
Retail	3,108	2,981	-127	2,526	455
Employment - Workspace	698	793	+95	853	0
Other Town Centre (a)	534	0	-534	-534	
Civic/Community (b)	824	2,735(c)	1,911	2,632	103
Nurse	-	250	250		
Total	5,164	6,759	+1,595		

Masterplan – Existing and Proposed Non-residential floorspace

- (a) includes betting office 95 Fore Street (sui generis), mini-cab office 115b Fore Street (sui generis), dental practice 91 Fore Street (E(e)), and doctors GP practice 107 Fore Street (E(e))
- (b) includes Boundary Hall, Library 109-111 Fore Street, and Community Hall
- (c) includes new civic hub

Block	Proposed Use Class	Commercial (sqm)	Civic community (sqm)	Employment (sqm)	Nurse (sqm)
C	E (a-e)	695		433	
D	F1 (a-e) / F2 (a-b)	0	103		
E	E (a-e)	675		360	
G	F1 (a-e) / F2 (a-b)	148	2,632		
M	E (a-e)	208			
N	E (a-e)	455			
O	E (a-b) / Sui Generis	499			
P	E (a-b) / Sui Generis	301			
Q	E (f)	0			250

Total		2,981	2,735	793	250
Total	6,759sqm				

Masterplan - Proposed Non-residential floorspace by Block

- 11.11. A total commercial /retail floorspace of 2,981sqm is proposed. The proposals would result in a small net loss of retail (Use Class E a/b/c) of 127sqm. This is offset by an uplift (1,595sqm) and more diverse range of high-quality new community, leisure, education and commercial uses and employment worker spaces.
- 11.12. The proposed uses within Class E and Sui Generis summarised above, are to be provided at ground floor level and fronting onto Fore Street and the newly created public spaces at the Fore Street Square and Southern Gateway.
- 11.13. Within the Detailed element of the scheme 455sqm of retail floorspace is proposed within the ground floor of Block N, fronting Fore Street (Phase 2). The remaining commercial floorspace would be brought forward in the relevant blocks as part of Reserve Matters Applications. Conditions, Development Specification and parameter plans will secure the commercial floorspace as a minimum to ensure the range of uses would be ensured to serve the local and wider community.
- 11.14. The Masterplan proposes up to 6,759 sqm. of non-residential use. The quantum and spatial distribution are considered commensurate for a scheme of this nature. The Outline element of the proposal would be controlled by the following maximum and minimum floorspace parameters in the Development Specification and parameter plans and restrictions of certain use, by condition.

Land Use	Class	Minium Sqm	Maximum Sqm
Retail/Commercial (Drinking Establishment)	E (Sui Generis)	2,273 (360)	2,526 (400)
Employment Workspace	E(g)	714	793
Community	F1 & F2	2,369	2,632
Nursery	E(f)	225	250

Table: Min. and max. proposed non-residential uses, outline element

- 11.15. The proposed uses (commercial, employment, community and Sui Generis) are discussed in further detail, below:
- 11.16. *Impact on the Angel Edmonton District Centre, Loss of Retail Floorspace and Sequential Test:* 1,518sqm of the proposed retail/commercial uses would be maintained within the designated Angel Edmonton District Town Centre (within Blocks C, E and G along Fore Street). Further expansion of commercial uses is proposed south (located within Blocks N (detailed), M, O and P (outline), totalling 1,463sqm, along Fore Street and would sit outside the District boundary.
- 11.17. The NPPF, LP Policy SD7, CS Policy 17 and DMD 25 set out Enfield's 'town centre first' approach. This seeks to manage development outside defined centres through sequential assessments.

- 11.18. Overall, there would be a reduction of 127sqm of commercial/retail floorspace within the District Centre and in addition to the quantum of floorspace proposed for the commercial uses outside of the district boundary (above the local threshold of 400 sqm), a sequential test has been undertaken to justify the proposals. In accordance with the requirements of the NPPF and CS Policy 17, it is therefore necessary to consider the appropriateness of the proposals in the context of the sequential and impact assessments, including an assessment of current levels of vacancies within the Angel Edmonton District Town Centre.
- 11.19. Paragraph 24 of the NPPF states local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre. Paragraph 2b-001 of the Government's Planning Practice Guidance (PPG) advises how the sequential test should be used in decision making and states that it "should be proportionate and appropriate for the given proposal". Paragraph 2b.011 of the PPG states that the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations.
- 11.20. The applicant has submitted a sequential test in support of the application. The assessment took account of vacant retail units within the Angel Edmonton District Town Centre. Five vacant units were identified by an onsite survey. Of those identified, investigations showed these were either small, physically run down or older retail floorplates. The sequential test shows there are no appropriate units for the quantum of retail proposed.
- 11.21. Following on, criteria ii. of DMD 25 states, in accordance with the sequential test, if no sites are suitable or available within the town centres listed in part i., then retail development at edge of centre locations that are accessible and well connected to and up to 300 metres from the primary shopping area will be permitted. The proposed commercial uses in Blocks N (detailed), O and P (outline) would be located within an acceptable distance of Angel Edmonton District Town Centre.
- 11.22. Overall, there would be no significant adverse impact from the proposed E Use Classes and would not result in adverse impact on the vitality and viability of the district centre. The proposal would not conflict with the underlying objectives of London Plan Policy SD 7, Policy DMD 25 of the Enfield Development Management Policies which seeks to protect the function of District Centres.
- 11.23. *Sui Generis Use / Drinking Establishment*: 400sqm (GIA) is proposed for a public house, wine bar or drinking establishment and/or a drinking establishment with expanded food provision in Blocks O and P (outline) (*Sui Generis* - in a use class of its own).
- 11.24. DMD 34 supports proposals for diversifying the evening economy. A vibrant and diverse evening economy can bring benefits to the local economy through sustaining businesses and providing jobs, while providing venues for entertainment, culture and socialising to residents and visitors.
- 11.25. DMD 34 states a vibrant and diverse evening economy can bring benefits to the local economy. In suitable areas, the Council will encourage applications that add to the mix of uses and would be particularly in favour of applications that would seek to expand the diversity of the evening economy in Angel Edmonton. Blocks O and P are suitably located within 300m from an existing designated

centre and therefore the proposed use is considered appropriate in this instance. Furthermore, the proposed Sui Generis use would front on to a newly created public space at the Fore Street Square and help to create active frontages and to animate key public spaces.

- 11.26. The proposed Sui Generis Use is, in conjunction with flexible E Uses, considered appropriate and would help to create a diverse economy as part of the comprehensive redevelopment and commercial provision in the vicinity of the Angel Edmonton District Centre and busy thoroughfare of Fore Street and in accordance with DMD 34 of the Development Management Policies.
- 11.27. *Phasing of the development and impact on existing retailers:* Traders will not have to move early given the sequencing of the phasing. The existing commercial tenants are located within identified Phases 6 and 7 of the redevelopment (fronting Fore Street). It is the intention to keep the current parades active to allow for adjustment to the redevelopment. The phasing of the development and non-residential uses assists in the operation and consistency of existing businesses on site.
- 11.28. Block N will come forward in Phase 2 (of the detailed element) of development. This will provide 455sqm of commercial floorspace and will give commercial tenants the option to decant or temporarily relocate on the Site, prior to demolition in the northern part of the high street in the later Phases (6 and 7).
- 11.29. An objection has been received regarding the loss of the Post Office and the corresponding loss of social infrastructure. As set out above the sequencing of demolition of the commercial parade will allow for the re-provision of this service if the Post Office choose to remain on Site. In addition, those that choose to relocate elsewhere on a permanent basis will be supported to do so by the Council.
- 11.30. *Urban Design Rationale to Fore Street:* In addition to the application satisfying the sequential test, the land use approach is supported, considering the site circumstances. The expansion of the commercial retail uses along Fore Street would help to re-establish and reinforce the existing urban pattern helping to resolve some of the design challenges created by the irregular placement and layout of the slab blocks to the south of the Site.
- 11.31. Block N, in the detailed phases, would help to re-establish the urban form and would reflect the mixed-use character of the high street. There are comprehensive masterplan principles and overall urban design rationale and place making benefits associated with the proposed land use strategy which are supported.

Non-Residential Uses Summary

- 11.32. Based on the information submitted, the sequential test assessment addresses the likely impact on the vitality and viability of the District Centre. This concludes there would be no significant adverse impact from the introduction of the proposed E Class Uses on the existing Centre. Overall, the proposal would not conflict with the underlying objectives of Policy SD7 of the LP, CS 25 and DMD 25 of the Enfield Development Management Policies which seek to protect the function of Centres.

- 11.33. Subject to planning conditions, restricting potential uses to E Use class (E a - e) and Sui Generis, the proposals for commercial uses outside of the designated centre are not considered to unacceptably impact on the functioning of this centre and would re-establish the existing urban pattern and provide commensurate uses to the masterplan.

Employment Uses

- 11.34. The application proposes employment workspace suitable for small and medium sized and micro businesses within side street / yard units within New Angel's Yards (Block E and C). These are proposed in Phase 7 providing 793sqm of employment floorspace. As a result of the proposed redevelopment of the estate, the proposal to increase the amount of ground floor workspace (Use Class E(g)) is welcomed.
- 11.35. The site currently includes 600sqm of existing temporary workspace use within converted garages (Angels Yard). This project was funded by the GLA via the Good Growth Fund. The proposed phasing strategy delivers dedicated workspace prior to the demolition of the Angel Yard site at Snell's Park. This would allow these businesses to move directly into new premises, should they choose to do so. The proposed phasing would allow continuity of commercial workspace within the Site, with Phase 7 (New Angel's Yard) constructed prior to the redevelopment of the existing Angel's Yards. This is supported and responds positively to the land use and economic regeneration objectives set out in the Council's draft site allocation.
- 11.36. It is envisaged that this northern part of the scheme (Block E and C), located parallel to the high street, will attract a diverse mix of employment uses and visitors, via enhanced pedestrian linkages and provide opportunities for people to work, meet and socialise. The location of this worker space is directly parallel to Fore Street and the Angel Edmonton District Town Centre, with the potential to increase footfall and future use of the existing/future shops and businesses, thus making a positive contribution to the overall vitality and viability of the High Street and District Centre.
- 11.37. A proportion of the proposed workspace (10%) will be affordable and let out at sub-market rent levels (25% below market rates) and on flexible terms to facilitate easy 'in and out' of local businesses / organisations. This is secured via the shadow s106.
- 11.38. Overall, the provision and phasing of workspace is supported and responds positively to the land use and economic regeneration objectives set out in the Council's draft site allocation.

Social Infrastructure / Community Uses

- 11.39. *Community Infrastructure:* Currently, the Site includes 824 sqm (GIA) of community floorspace. This is made up of Fore Street Library (495sqm) and Boundary Hall (329sqm). The Masterplan proposes a new Civic Hub in Block G set in the centre of the scheme, fronting Fore Street adjacent to a new public square.
- 11.40. The Masterplan includes up to 2,735 sqm (GIA) of community and civic floorspace (Use Classes F1 and F2), split between the Detailed Element where there will be 103sqm in Block D. The remaining floorspace is within the Outline

Element and provided through the provision of a new Civic Hub on the high street forming Block G.

- 11.41. The Civic Hub (brought forward in Phase 7) is proposed to include, a gallery/museum/rehearsal space (all flexible floorplates), a re-provided library/Good Growth Living Room, community halls, public square for markets and/or performance, informal workspace and a small-scale food and beverage unit on the main frontage and space to be used by the Metropolitan Police.
- 11.42. In terms of phasing, the construction of Block G is proposed prior to the demolition of the existing library located on Fore Street. Therefore, this would ensure continuity of provision and no temporary loss of existing community facilities in the phasing of the development. A continuity strategy for the community facilities and business plan would be secured via the shadow s106 agreement.
- 11.43. *Replacement of Boundary Hall:* The existing Boundary Hall (329sqm) would be demolished in the detailed element (Phase 2) of the scheme. There would be a community space constructed prior to this in Phase 1 Block D (103 sqm).
- 11.44. However, to compensate for a potential temporary deficit in the quantum of community floorspace at this point in the phasing, the applicant has committed to bringing forward a temporary community building (362sqm) in the interim, as part of their meanwhile use strategy. This proposed community space would be (as indicated on the parameter plans) located to the north of Block N, adjacent to Angels Yard, until the permanent reprovision in Block G is brought forward in Phase 7.
- 11.45. The temporary community centre is to be provided prior to the demolition of existing Boundary Hall. This temporary community space would be secured via a Grampian condition, requiring the submission of an early Reserved Matters Application on the detailed design (appearance) and obligations via the s106 to ensure continuity of the community facilities and there would be no net loss, permanently or in the interim. The meanwhile strategy to provide a temporary community hall for the loss of Boundary Hall is therefore appropriately reprovided and is considered acceptable.
- 11.46. *Nursery:* A new nursery would be in Block Q (Outline, Phase 4). Within the Masterplan this would adjacent to the civic hub, primary school and multi-use games area. The proposed nursery's floorspace has been sized (minimum 225sqm) to meet the expected child yield generated, based on the Environmental Statement, by the proposed development. The proposed nursery would be provided in Phase 4, where there is expected to be additional need for nursery spaces which is considered acceptable in this instance.
- 11.47. In relation to the nursery provision, recommended conditions require the nursery to be delivered in Phase 4. The ES identifies that nursery capacity is likely to be exceeded prior to this point. However, this is the earliest the nursery can be provided to address the demand given the constraints of the existing buildings and this provision is considered appropriate mitigation.

Summary of Social Infrastructure

- 11.48. The proposals to improve social infrastructure on the Site would represent a significant qualitative and quantitative increase compared to the existing

situation and floorspace. The accessibility and prominence of the new civic hub is supported and would accord with the principles set out in London Plan Policy S1.

- 11.49. The overall approach to social infrastructure is strongly supported and would ensure the delivery of modern, enhanced, multi-functional and accessible social infrastructure facilities with no net loss in terms of the existing provision. The proposals are therefore in accordance with London Plan Policy S1.

Open Space

- 11.50. The Site contains several existing public open spaces which are designated as locally designated local open space in the adopted Enfield Local Plan proposals map as well as other areas of soft landscaping to the housing blocks. There is also an existing Multi-use Games Area (MUGA) in the centre of the Site. The table below sets out the existing and proposed open/play space:

Type	Existing sqm	Proposed sqm
Open Space - Parkland	10,798 (designated POS)	20,930
MUGA	1,010	1,185
Soft Landscaping	18,501	5,800
Civic Space (hard landscape)	-	2,420
Total	30,309	30,335

Table: Existing and proposed open space provision (sqm.)

- 11.51. Currently many of the public open spaces and amenity lawns are of a generally low environmental and design quality. This is due to a variety of issues including dominant visual impact of car parking and hard standing; the layout and design of blocks, garages, fencing and walls which restricts movement and limits visual and physical permeability through these open spaces; and a lack of natural surveillance.
- 11.52. The masterplan layout carefully balances the placement of blocks and consolidated green space. Two new large public open spaces are proposed, as part of a cohesive and integrated landscape linked by a new ecological route running north-south through the centre of the Site. The open space also includes a new school square, a replacement MUGA, a public square to Fore Street, smaller pocket parks and tree lined streets.
- 11.53. Whilst the Site is in an area of open space deficiency, the masterplan would result in a significant qualitative as well as provide a small quantitative improvement in open space provision on a constrained site, seeking to balance a number of planning considerations.
- 11.54. The proposed development provides landscaped open spaces that are accessible to the public including improved community access to the MUGA. As such, in land use terms, the proposed development is acceptable in principle and is consistent with the aims and objectives of the NPPF as well as London Plan Policies GG2, GG4, S1 and H1.

Summary of Principle of Land Use

- 11.55. The Site constitutes previously developed land and therefore the principle of developing the Site for housing to support the Borough's housing delivery target is supported. The proposal is aligned with making the best use of land and building to suitable densities on well-connected sites.
- 11.56. The development will be residential led, given the need to re-provide the existing housing on site. The proposals accord with the draft planning policy allocation and the strategic objectives for estate regeneration and will provide an intensification of the established residential (Use Class C3) use on previously developed land that has been identified for additional housing growth and regeneration. Accordingly, the principle of residential led development on this Site is fully supported.
- 11.57. The range of non-residential uses proposed are acceptable in this location as part of the overall plans to re-develop and re-generate the estate and contribute to the wider economic, social, and environmental sustainability of the area, making a valuable contribution to the overall sustainability and vitality of the District Centre. The new and re-provided community facilities will also provide activity and a new civic heart to the place and the new workspace will provide economic opportunities for local business, whilst ensuring no temporary or permanent loss, during the phased construction.
- 11.58. Accordingly, considering the above policy considerations, the development proposals represent appropriate land use/future uses in the overall redevelopment and regeneration of the estate and amount to public benefits in support of the proposal.

12. Housing and Affordable Housing

- 12.1. The NPPF is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions ensure that developments make optimal use of the potential of each site. In these circumstances...”c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF”. The NPPF also sets out the national objective of significantly boosting the supply of homes.
- 12.2. The London Plan also acknowledges the extent of the housing crisis in London. The population is projected to increase by 70,000 a year, reaching 10.8 million by 2041. This means that just to meet demand, tens of thousands of new homes need to be built every year. Policy H1 of the London Plan seeks to increase the supply of housing in London and optimise the potential for housing delivery on all suitable and available brownfield Sites including those with good public transport accessibility. Policy H1 seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating). Policy H1 also highlights the urgency to optimise housing provision on brownfield sites, specifically identifying opportunity for housing intensification and development on publicly owned sites.
- 12.3. The London Plan provides a ten-year housing target for each of the London Boroughs. The 10-year target for Enfield is 12,460 homes over the period 2019/20 to 2028/29. This identifies a need for a minimum of 1,246 dwellings per

year to be delivered over the next 10 years in the Borough, an increase over the previous target of 798.

- 12.4. Enfield's Housing Delivery Test Action Plan 2023 found that in the period 2019/20 to 2021/2022, the Council met 73% of its housing target delivering 995 homes in 2021/22. This is an improvement on the previous year (847 completions) despite challenging market conditions. However, as delivery across three years is 73% of the Government's requirement, the Council is placed in the 'presumption' category. This requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5-year housing land supply which is monitored through the AMR.
- 12.5. Enfield has close to 40% of land currently designated as Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south-east growth corridors. These land designations underpin the need to optimise development on brownfield land.
- 12.6. The New Enfield Local Plan (ELP) was published at Regulation 19 Stage between 28 March and 28 May 2024, and acknowledges the scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough and to continue to delivery housing growth to 2041.
- 12.7. The emerging Local Plan identifies that the application site falls within the Angel Edmonton Urban Placemaking Area, led by draft Strategic Policy SP PL4. The draft policy sets out the aspirations for the area, including the potential for introducing a range of housing typologies; denser forms of development / residential growth and achieving a thriving, mixed use place. Additional objectives include improved connectivity, healthy streets, and new / enhanced open space as well as habitats mitigation.
- 12.8. The Site forms the majority of draft Site Allocation SA15 in the draft Local Plan. This references the provision of 1,217 net homes on site which reflects the delivery trajectory set out in the SHLAA and is based on the number of homes predicted to come forward during remaining 17-year period of the draft plan (2024 – 2041). The New Enfield Local Plan supports the principle of increased residential provision along with commercial and community uses and associated social infrastructure. Although of limited in weight, it sets out the trajectory of policy for this area and site specifically.
- 12.9. As summarised in the table below, the proposed development will provide up to 2,028 new homes overall, considerably increasing the existing number of 795 homes. In this context it is also important to understand that high density housing does not necessarily equate to overcrowding. Along with many other London Boroughs, LB Enfield faces an acute shortage of affordable housing, contributing to homes with more people living in them. Overcrowding can occur in private rented or Council homes where households cannot afford or find available, homes large enough to meet their needs. The new housing proposed by this scheme, and particularly the social rent homes and the landlord offer, will help ease this critical shortage, by better matching homes to the right household size and freeing up existing accommodation, as discussed below.
- 12.10. Taking into account the housing needs of Enfield's population, nationally and regionally set housing delivery targets and shortfalls in meeting targets, the proposal to re-develop the existing estate is, in principle supported. The

proposal would make more effective use of Council owned land to provide a greater number of better-quality homes, with a range of relevant housing types/tenures to meet an identified need as set out in planning policy and is, therefore strongly supported.

Affordable Housing

- 12.11. Policy H4 Part A of the London Plan (LP) (2021) sets the strategic target for 50% of all new homes delivered across London to be genuinely affordable. This sets out specific measures to achieve this strategic aim which include requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach set out in Policy H5 of the London Plan, and then using grant to increase affordable housing delivery beyond the level that would otherwise be provided.
- 12.12. Emerging Local Draft Policy H2 identifies that the requirement for affordable housing on eligible sites (those comprising ten or more new homes or have a combined gross floorspace greater than 1,000sqm) is 50% where the site is owned by the Council and is an estate regeneration scheme.
- 12.13. LP Policy H4 requires 50% of all new homes to be genuinely affordable. The specific measures further require all affordable housing providers with agreements with the Mayor to deliver at least 50% affordable housing across their development programme, and 60% in the case of strategic partners; and require developments on public sector land to deliver 50% affordable housing on each site. Public sector landowners with agreements with the Mayor to follow the London Plan's portfolio approach are required to deliver at least 50% affordable housing across their portfolio of sites. Part B of Policy H4 of the London Plan requires affordable housing to be provided on site.
- 12.14. LP Policy H8 details the Mayor of London's position on the loss of existing housing and estate redevelopment. Part A sets out that the loss of existing housing should be replaced by new housing at the existing or a higher density, with at least the equivalent amount of housing floorspace re-provided.
- 12.15. Core Policy 3 of the Core Strategy (2010) 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.
- 12.16. Policy H2 of the New Enfield Local Plan (ELP), whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on development sites and that the Council will set a strategic target of 50% of new housing to be affordable.
- 12.17. The Site forms an important part of the Council's Housing Renewal Programme portfolio and is one of several key sites identified by the Council to address the acute need for new social housing in the Borough. The Applicant's objectives are to re-provide the number of affordable homes which require re-provision, and to maximise the number of much-needed affordable homes that can be delivered on the Site through making efficient use of underutilised land, whilst sensitively addressing the various site constraints and challenges on the estates and ensuring a viable and deliverable scheme.

	Tenure	Units	Habitable Rooms	Floorspace (sqm)
Existing	Social Rent	434	1,249	28,383
	SO, SE	0	0	0
	Private	361	1,151	25,301
	TOTAL	795	2,400	53,684
Proposed	Social Rent	625	2,110	Max. 102,929
	SO, SE	388	1,147	
	Private	1,015	2,825	Max. 97,416
	TOTAL	2,028	6,082	200,345
Uplift	TOTAL	1,233	3,682	145,199

Note – proposed housing figures based on detailed element and indicative masterplan for outline

- 12.18. Of the overall provision of up to 2,028 new homes proposed, 1,013 homes are proposed to be affordable. 625 homes will be for social rent and 263 shared ownership, and 125 offered for shared equity (in the case of re-housing resident homeowners) to reflect the need to provide replacement housing for existing tenants as well as responding to the requirements of the Council's housing waiting list.
- 12.19. The London Plan requires that the percentage of affordable housing on a scheme is calculated in habitable rooms, in the first instance to ensure that a range of unit sizes is provided. The applicant's Affordable Housing Statement outlines that the proposed scheme's affordable housing provision when measured on a habitable room basis reflects 53% in terms of habitable rooms and 49% by unit.
- 12.20. The delivery based on habitable rooms exceeds the requirement of 50% gross development for estate regeneration schemes in the London Plan and therefore is in accordance with policy and supported. This has been supported by a viability statement which demonstrates this is the maximum the scheme can offer.
- 12.21. Overall, the proposed affordable housing represents a net increase of 579 affordable homes across the Site. In this case, Enfield Council is prioritising the delivery of low-cost rented homes to re-house existing residents in response to the most up to date identified need set out in the LHNA (2020) as well as the requirement to address the acute needs of the Council's housing waiting list. As such, a significant proportion is to be allocated in the form of social rent and the mix of proposed social rent uplift homes and shared ownership homes within the Detailed Element reflects the unit size priorities set out in the LHNA 2020 and reflected in Draft Policy H3 of the ELP.
- 12.22. London Plan Policy H8 sets out key policy requirements for the loss of existing housing and estate regeneration, requiring the loss of existing housing to be replaced by new housing at existing or higher densities with at least equivalent level of overall floorspace.
- 12.23. As set out earlier, the proposed development will result in a net increase in affordable housing on the Site and include the introduction of new affordable tenures in the form of shared equity and shared ownership homes. Overall, there will be an additional 579 affordable homes (net) and 2,008 additional habitable rooms (net), that will be delivered across the Site.

- 12.24. The Detailed Element of the proposal will deliver 575 homes (Phases 0-3) of which 526 homes will be affordable (91%) to enable re-housing of existing tenants and respond to identified local need. The composition of the homes is as follows, including the proportion of replacement homes within Phases 0-3. The remainder of the replacement homes will be provided in outline element phases 4 and 5.

Housing Tenure and Mix - Detailed Element (Units)								
Tenure	1 bed	2 bed	3 bed	4 bed	5 bed	Total	%	
Social Rent	133	113	134	11	2	393	68%	
Shared Equity	16	29	28	0	2	75	13%	
Shared Ownership	19	39	0	0	0	58	10%	
Private	25	14	10	0	0	49	9%	
Total	193	195	172	11	1	575	100%	
%	34%	34%	30%	2%	0%	100%		
Total in Detailed Phases (0-3) 575 units								

Table: Proposed Tenure Mix – Detailed Phases

- 12.25. This will support the Council's key objective of the re-housing strategy by limiting disruption to existing residents by moving them into their new home as quickly as possible. It also demonstrates the priority for delivering a higher proportion of replacement affordable homes within the early phases and is supported.
- 12.26. The proposed scheme provides 53% affordable housing overall, above the strategic target established by Policy which has been achieved, with the use of grant from the Mayor of London. The proposed scheme's affordable housing provision is therefore consistent with the affordable housing objective set in the London Plan and is in line with the Mayor's Good Guide to Estate Regeneration (2018) which requires an uplift in the amount of affordable housing by unit, habitable room and floorspace and is strongly supported.

Phasing and Decant of Existing Residents

- 12.27. The Proposed Development is intended to be brought forward in 11 Phases. Phases 0-3 comprise the Detailed Element. Phases 4-10 are within the Outline Element. The total number of existing homes on site is 795. 434 homes are affordable units and 361 private. The Council currently owns and manages the majority of the affordable housing on site. 44 homes are managed by several Housing associations. 153 homes are resident lease/freeholders. This totals 587 households eligible for re-provision (decant) based on the Landlord Offer.
- 12.28. This sets set out that anyone living on the estates in a secure social tenancy (434 households) would be re-homed on-site in a new social rented home, and existing resident leaseholder/freeholders (153 households) would be re-homed on-site in a new shared equity home. In relation to the non-residential leaseholder/freeholder households on the estate (208 households), these are not eligible to be re-provided by the Council unlike the existing social rent and resident leasehold/freehold homes. Therefore, these homes are being bought back by the Council and will be re-sold as market tenure homes.
- 12.29. The Council has undertaken an assessment of housing need with particular focus on those households affected by the detailed phases to identify the extent of any under and over-occupation, which has informed the unit mix. This process

has helped broadly identify the number of households who require the same sized home as currently, those who may be willing to downsize and those who are over-occupying and a require a larger home to meet their needs. This situation will be subject to ongoing review by the Council to capture any changing requirements and those households who request to be rehoused off-site elsewhere in the borough, in accordance with the provisions of the Landlord Offer. The proposed Social Rent unit mix for the detailed application is based in-part on certain assumptions given the dynamic situation at this stage in the process but has been tested against current understanding of housing needs of existing residents.

- 12.30. Council tenants will be offered an alternative home on a social rent with no less security of tenure than they currently have. Rent levels will align with the Council's social rent levels for the Borough depending on the size of the home which tenants choose to move into. Home loss and disturbance payments will be made to tenants to compensate for the move. In addition, the unit mix for the additional Social Rent homes being provided beyond those required to address decant requirements is driven by the need to address local housing need in the borough set out in the LHNA, which is reflected in the Draft Enfield Local Plan. This identifies a high priority for two and three-bed Social Rent homes and a medium priority for one-bed units.
- 12.31. The proposed social unit mix (in the detailed phases) reflects a reduction in two-bed units and a notable increase in three+ beds, which reflects both a combination of existing households seeking to downsize and those with overcrowding requirements coupled with a priority to provide a higher proportion of family-sized Social Rent homes to meet identified borough-wide need as dictated by policy. Given the relatively even distribution of unit sizes, there is flexibility to address changing requirements of existing households during the delivery of the detailed phases.

Tenure - Existing	1-Bed	2-Bed	3+ Bed	Total
Social Rent	155	230	49	434
	36%	53%	11%	
Tenure – Proposed (Detailed)	1-Bed	2-Bed	3+ Bed	Total
Social Rent	133	113	147	393
	34%	29%	37%	

Table: existing and proposed social rent homes (in detailed phases)

- 12.32. In addition, there are 116 social rent units in the detailed phases that will be demolished. 393 social rent homes will be reprovided, providing a high degree of choice. The remaining decant and additional Social Rent homes will be provided in later phases. Given this forms part of the outline application, the unit mix is illustrative at this stage and will be defined at Reserved Matters stage with reference to identified housing needs at that point in time.
- 12.33. 153 homes are resident lease/freeholders. 125 shared equity units are proposed in the application. It is assumed, not all residents will wish to remain on the estate and the proposed unit mix has been developed specifically to meet the needs of existing owner occupiers on-site who have expressed a desire to remain living on the Site. Any of these shared equity homes not to be taken up by existing residents would be provided as Shared Ownership, ensuring these remain as affordable tenure.

- 12.34. Phase 0, the first phase (Block A) is located on part of the estate which does not comprise any buildings. This would enable 50 homes and allow residents to move directly into new accommodation prior to the first block being demolished (Wadham House). Block D would then be constructed to enable the affected residents to be rehoused first prior to demolition.
- 12.35. In the initial phases (Phases 0-3, the detailed element), 245 existing homes (116 affordable) will be demolished. By completion of the detailed element (Phases 0-3), there will be 526 affordable homes (393 social rented homes).

Detailed Phases	Total Homes	Affordable Homes	
		By Unit	% of Total Homes
Phase 0	50	50	100%
Phase 1	220	220	100%
Phase 2	148	99	67%
Phase 3	157	157	100%
Total	575	526	91%

Table: affordable homes in detailed phases

- 12.36. Phases 4 and 5, will include the delivery of the remaining eligible replacement (decant) homes following the Detailed Element (Phases 0-3). The remaining 550 existing homes will be demolished in the later phases (Phases 4-10, the outline element).

Outline Phases	Total Homes	Affordable Homes	
		By Unit	% of Total Homes
Phase 4*	167	167	100%
Phase 5*	279	108	39%
Phase 6	287	35	12%
Phase 7	245	144	59%
Phase 8	115	33	29%
Phase 9	134	0	0%
Phase 10	226	0	0%
Total	1,435	487	34%

*Table: Indicative Affordable Homes in outline phases
expected decant of remaining eligible residents

- 12.37. For Detailed Phases the development runs off a sequence of decant existing, demolition and then construction of new homes. An accelerated construction programme has been adopted from Phase 4 onwards whereby some decant momentum has been achieved and groups of new blocks can be built simultaneously.
- 12.38. Decant of existing residents continues to the end of Phase 5. The demolition of existing buildings continues to Phase 8. Phases 9-10 are enabling and then construction. Whilst the earlier phases deliver predominately affordable homes, the remainder of the later phases will also provide new social rent, shared ownership and market sale homes, to help establish a mixed and balanced community.
- 12.39. It is acknowledged, the housing strategy requires flexibility to allow the proposed housing tenure and mix to respond to the needs of the households who wish to

stay on the estate. As a result, the proposed housing tenure and mix in the Outline Element (Phases 4-10) will be reviewed with further housing needs surveys to be completed throughout the delivery of the Proposed Development, which will inform the detailed proposals to be submitted at the reserved matters stages for the Outline Element. To ensure the affordable housing levels do not fall below those existing on site and a minimum provision of affordable housing is secured, clauses are recommended as part of the s106.

- 12.40. All existing homes on the Site will be re-provided in the Proposed Development. All secure tenants and resident homeowners will have the 'right to remain' on the Site and will be offered a new home. A key objective of the Council's rehousing strategy is to limit disruption to existing occupants as much as possible. The strategy for replacement homes will also enable all existing residents to only have to move to a new house once i.e. from their existing home and into their new home on the estate, should they choose to do so. If existing social rent tenants decide to move away from the Site, they will be given priority status in the Council's letting scheme to bid on other Council-owned homes in the Borough. They will remain entitled to a new home on the Site up until the point they move out.
- 12.41. Having reviewed the indicative phasing and decant strategy, officers are satisfied that that the detailed and outline phases would ensure the decant requirements are met, in line with the Landlord Offer and would help facilitate the rehousing of residents with a single move. This is supported, in accordance with the Mayor's Good Practice Guide to Estate Regeneration.

Housing Tenure

- 12.42. Policy H6 sets out that the following split of affordable products should be applied to residential development. The Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision (Core Policy 3 and DMD Policy 1).
- 12.43. Emerging Local Draft Policy H2 sets out that 50% of affordable housing should be for social/affordable rented housing and 50% should be provided as intermediate affordable housing products including Shared Equity and Shared Ownership.
- 12.44. The hybrid application proposes up to 2,028 residential homes, of which, a total of 1,013 homes would be affordable. These would consist of 625 would be social rent, 263 shared ownership, 125 shared equity (and 1,015 private homes based on the detailed and indicative outline housing mix).
- 12.45. This would represent a tenure mix of 62% for social rent with the remaining 38% offered for shared ownership or shared equity (in the case of rehousing resident homeowners) across the masterplan. In the detailed phases 75% would be social rent and 25% intermediate. The scheme is designed as tenure blind, in terms of external specifications, and all occupiers would have the same access to communal facilities.
- 12.46. The tenure split is not wholly compliant with the London Plan. However, this is due to the need to rehouse existing tenants, based on the Council's Landlord Offer and identified need for low-cost housing. Broadly, the tenure mix complies with the above policy and as such the proposal is considered acceptable in this regard and in accordance with H6 of the London Plan.

Housing Mix

- 12.47. London Plan Policy H10 sets out that all residential development should generally consist of a range of unit sizes, which should be based on, amongst other things, local evidence of need. Regarding low-cost rented homes, Policy H10 states Boroughs should provide guidance on the size of units required by new development to ensure affordable housing meets identified needs. This should take account of evidence of local housing needs, including the local housing register and the cost of delivering larger units and the availability of grant.
- 12.48. Core Policy 5 of the Core Strategy seeks to provide a mix of housing borough wide. The evidence bases to support the unit mix set out in Core Policy 5 dates from 2008. The preferred housing mix in the Core Strategy (based upon local housing need information and market signals) has been updated through the Local Housing Need Assessment 2020 (LHNA), which has been prepared as part of the evidence base to support the preparation of the ELP. This has identified a shifting priority for housing mix that more accurately reflects the needs of the Council's housing waiting list and is an important material planning consideration in context of providing a more up-to-date empirical position.
- 12.49. Draft Local Plan Policy H3, outlines priority types for different sized units across different tenures.
- 12.50. The Detailed Element of the application provides a fixed quantum and mix of homes. The Outline Element provides for a maximum quantum of floorspace defined by parameters set out in the Development Specification. It is expected that the Proposed Development will take approximately 23 years to build out. A degree of flexibility is needed to allow the proposed housing tenure and mix to respond to changing needs over this period. The illustrative proposals for the Outline Element reflect an indicative mix of homes up to the maximum amount of floorspace proposed, which could inductively deliver up to 1,453 homes. Combined with the fixed number and mix of homes in the Detailed element, the masterplan indicative mix is shown as:

Tenure	1-bed	2-bed	3-bed	4-bed	5- bed	Total	%
Social Rent	199	219	189	16	2	625	31%
Shared Equity	29	60	33	1	2	125	6%
Shared Ownership	105	138	20	0	0	263	13%
Market Sale	475	417	114	9	0	1,015	50%
Total	808	834	356	26	4	2,028	100%
%	40%	41%	18%	1%	0%	100%	

- 12.51. The proposed housing mix by tenure has been shaped by characteristics of the scheme as an estate regeneration project and decant and rehousing requirements. All existing social rent households who are remaining on the estate would be provided with a home to meet their occupancy requirements, plus one bedroom, which is welcomed.
- 12.52. In total, 386 family sized homes would be provided. This equates to 19% overall. More than half of the family housing provision is in social rent tenure where there

is a strong identified need. The minimum percentage (19%) of family homes is secured via the Shadow s106.

- 12.53. Although the overall housing mix is inconsistent with the balance of dwelling types sought by CP5, the proposal would fulfil the aims of LP Policy H10 by providing well-designed one- and two- bedroom units in a suitable location. This would provide opportunities for those in the Borough looking to downsize, enabling larger dwellings elsewhere to become available for new occupiers. In addition, one-bedroom units play an important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes.
- 12.54. In this context, and in view of the significant undersupply of housing against the 5-year housing target and the shortage of new affordable housing and housing in general in the Borough ('titled balance'), only limited weight is given to Policy CP5 in this instance. The proposed dwelling type provision is considered to align with the SHMA, which identifies a need for all housing sizes, including 1 and 2 beds.
- 12.55. Whilst there remains a substantial need for 3 bed + the ability to deliver this needs to be informed by particular site considerations, including viability. The proposal would contribute towards identified housing needs of the LHNA. The scheme optimises family units at lower levels, with 3 bed units provided generally in the lower scale buildings, which have direct access to gardens and are more accessible.
- 12.56. Importantly, the mix has been informed by the scheme's overall viability. A Market Report has been submitted (JLL). At present the scheme is in deficit. To support a larger quantity of these types of units would likely negatively impact overall viability of the development. It is also noted that any consent would be subject to the inclusion of viability review clauses and any additional profits would need to be fed back into the delivery of additional affordable housing should this become viable.
- 12.57. The proposal would increase the number of larger 3-bed social rented units (net increase across the masterplan of 158) of which there is significant need. This is given weight in the assessment of the application. In addition, the proposal would still accord with the requirements of policy CP5 in continuing to offer housing types with a mix of 1, 2 and 3 beds that would meet identified housing needs. Overall, there is a need for all unit sizes and the scheme provides an appropriate housing mix in this instance.
- 12.58. Section 38(5) of the Planning and Compulsory Purchase Act 2004 sets out where policies of development plan conflict with each other, the conflict must be resolved in favour of the policy that is contained in the last document to become part of the development plan. In this case, whilst the proposal is inconsistent with Policy CP5 of the Core Strategy, Policy H10 therefore takes precedence in the determination.
- 12.59. Accordingly, the overall proposal would continue to offer a range of house types that take account of housing requirements in the borough. The proposal would also meet policy DMD 3 of the Enfield Development Management Document 2014 which seeks the provision of a mix of homes. These policies are also consistent with the NPPF. Therefore, the proposal is consistent with the

development plan in terms of its delivery of the appropriate mix of dwellings on the Site.

Viability

- 12.60. Policy H8 of the LP states development proposals that include the demolition and replacement of affordable housing are required to follow the 'Viability Tested Route'. Estate regenerations schemes should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.
- 12.61. In support of their application, the applicant provided a financial viability assessment (dated November 2022) produced by the applicant's viability consultant DS2 with addendums, the latest of which is dated 30th April 2024.
- 12.62. The Council appointed an external assessor (BPS) to review the applicant's viability assessment. BPS provided a full response to the latest proposals on 27th March 2024, updated by an addendum on 08/04/2024 (the BPS Review), which reflects the maximum number of units of residential homes 2,028, of which, 625 would be social rent, 263 shared ownership, 125 shared equity and 1,015 private homes based on the detailed and indicative outline housing mix. The proposed affordable and shared equity housing represents 53% of the total housing by habitable room (49% by unit).
- 12.63. It is important the scheme has a reasonable prospect of being delivered, and the workings of both the applicants and Council advisors indicates that the viability position is challenging. BPS have assessed the cost and value inputs within the financial appraisal in order to determine whether the scheme can viably make the maximum affordable housing provision. The BPS Review, notes that the applicant's offer is contingent on receipt of grant identified within the scheme appraisal as totalling £54.4 million in the Detailed Phases.
- 12.64. The NPPG advises, to define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. Viability assessments should be undertaken using benchmark land value.
- 12.65. The approach to Benchmark Land Value, of Existing Use Value+ is largely agreed between the parties. Whilst BPS conclude a significantly different Benchmark Land Value (BLV) of £11.4m compared to the applicant's £112.13m, this is due to the buyback costs being excluded from the BLV and being reflected accurately in the cashflow at the actual cost levels incurred. As the applicant has agreed that buybacks should be included as an actual cost within the cashflow, rather than form part of the BLV for review purposes, this element is largely agreed but requires resolution for the s106 drafting process.
- 12.66. The Council's viability consultants have advised that given the nature of the proposals and delivery of wider regeneration as part of the long-term development programme, that viability should be monitored and reviewed at regular intervals and on an open book basis, to allow all variables to be considered and fully assessed over the duration of the development. It is recommended that agreement is secured on the appropriate approach to target Internal Rate of Return and Benchmark Land Value (in order that compensation and buyback costs can be reflected accurately and appropriately at review) to provide clear parameters as part of these reviews.

- 12.67. As such a series of early, mid, and late-stage reviews on an open book basis are proposed, where all possible variables can be assessed in real time in the cashflow in the appropriate way. In terms of the mid-term review mechanisms, these should be applied to RMAs, following the detailed phase. Open book reviews of the scheme are recommended to be secured as part of the terms of the shadow s106 agreement. If viability of the scheme improves overtime, these obligations would enable additional affordable housing provision across the Site.
- 12.68. Appraisals undertaken by BPS show the scheme produces a positive Internal Rate of Return of +5.58% assuming an annual regeneration benefit of 2.5% and a BLV of £11,448,450. This leaves the scheme in a deficit. Therefore, the scheme is not currently able to contribute towards or provide any additional affordable housing, above that currently stated.
- 12.69. Sensitivity analysis has been undertaken to test the impact of changes to costs and revenues (Appendix Three of the 27th March 2024 BPS review). This shows that the deficit is eroded assuming a 10% rise in revenues and 5% fall in build costs, or alternatively a 5% rise in revenues and 10% fall in build costs.
- 12.70. In summary, the submitted viability appraisal indicates that the proposed scheme would be in deficit. Nonetheless, overall, it is proposed to provide 53% affordable housing (based on hab. room) across the whole scheme with over half (625) of the overall affordable housing units (1,013) to be provided at social rent. In the detailed phases (0-3) 91% of the housing would be affordable.
- 12.71. Overall, the proposed level and mix of affordable housing is the maximum reasonable amount of affordable housing that could currently be delivered at the site and is considered acceptable, subject to a s106 clause to secure early stage, mid stage and late-stage reviews.

Housing Summary

- 12.72. The Government prescribes a 'tilted balance' in favour of housing delivery to the Council's planning decision-making as a result of Enfield's shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. Development on Council land and the overall benefits of the regeneration of the estates presents a significant opportunity to provide much needed housing.
- 12.73. The proposed affordable housing provides 53% of the total housing proposed by habitable room (49% by unit). The tenure split would be broadly compliant. Given the evidenced need for new housing, the requirement to re-house existing tenants on site, front load the delivery of affordable homes into the earlier phases and respond to identified local needs, it is considered that the collective benefits of the proposal, outweigh any divergence of the dwelling size/mix from the policy requirements set out within the Core Strategy and the Draft Local Plan. The scheme is considered in accordance with Development Plan policy and complies with the NPPF's objective of ensuring the effective use of land in meeting the need for homes.

- 12.74. Given the size and complexity of the scheme and demolition and construction timescales, phasing obligations are included in the shadow s106 agreement to ensure that the decant and reprovision requirements are clearly set out and secured in terms of the minimum replacement social rent provision by phase which are to be secured prior to occupation.

13. Design and Townscape

- 13.1. Section 12 of the NPPF sets out the Government's objectives for achieving well-designed places. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.
- 13.2. Reflective of Chapter 11 of the NPPF, and paragraph 119 in particular, LP Policy GG2 says that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must, in summary, enable the development of brownfield land particularly on sites within and on the edge of town centres, as well as utilising small sites; prioritise sites which are well-connected by existing or planned public transport; promote higher density development in locations that are well-connected to jobs, services infrastructure and amenities by public transport, walking, and cycling; apply a design-led approach to determining the optimum development capacity of sites; and understand what is valued about particular places and use that as a catalyst for growth, renewal, and place-making.
- 13.3. London Plan policy D3 (Optimising site capacity through the design-led approach) seeks the optimisation of site capacity through the design-led approach. It says that all development must be designed to make the best use of land in a way that is contextually appropriate.
- 13.4. 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. LP Policy D4 is geared to deliver high-quality design and place-making.
- 13.5. Local Plan Core Policy 30 and Local Plan Policy DMD Policy 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.
- 13.6. The application has been subject to extensive pre-application discussions between the applicants, the LPA, the GLA, TfL, London Borough of Haringey (given its proximity to the borough boundary) and other key stakeholders. The Masterplan has evolved since May 2019 through a series of pre application meetings including design based and other specialist topic workshops covering a wide range of inter-related disciplines.
- 13.7. The planning application has been subject to an independent design review process, led by the Enfield Place and Design Quality panel (DRP), which met on six occasions to discuss the proposals for the Site. Alongside these processes, engagement with the local community and existing residents has taken place and two revisions to the detailed element of the application to adapt to new regulations governing staircase provision in tall buildings.

Proposed Layout

- 13.8. The Masterplan sets out the proposed approach and strategy for both the Detailed Element (Phases 0-3) and the Outline Element (Phases 4+).



Image: Proposed Masterplan Layout (detailed and outline)

- 13.9. The design strategy for the Masterplan has emerged from a desire to create a series of clear and legible routes and connections. These prioritise pedestrians and cyclists at the top of the user hierarchy but also knit the estates back into their surrounding context. The improvement in permeability for active travel north south and east- west is welcomed and a key benefit of the scheme.
- 13.10. A range of blocks and building typologies would be provided across the Site, including perimeter courtyard blocks, mixed use blocks, linear and L-shaped blocks, terraces and tall buildings. The proposed block and building layouts are highly efficient.

- 13.11. The provision of perimeter courtyard blocks and linear and L-shaped blocks is supported. This would provide the opportunity to wrap the majority of car parking behind more active frontages with parking situated within podiums and communal courtyard gardens provided above. Front doors and clearly defined front boundaries are provided at ground floor level. This would help create a strong relationship with the public realm and provide clear definition between public and private space.
- 13.12. To the centre of the scheme, there is a strong relationship formed between the new civic hub, primary school and nursery and new school square proposed. Fronting onto Fore Street to the east would be another line of strong perimeter blocks. To the centre of the scheme park edges would be well-enclosed by the adjacent blocks with relatively consistent shoulder heights proposed to frame these two spaces with a home street to the west of the Site which successfully addresses the railway.
- 13.13. The Masterplan comprises two substantial landscaped public open spaces at the centre of the scheme – ‘the Meadows’ and ‘the Northern Grove’. These two spaces would be linked by a continuous green spine route running through the centre of the Site. This green spine would incorporate play space provision, walking and cycling routes alongside lawn, meadow, swale and wetland planting areas. A series of home zone streets, pocket parks, park streets and green links and yard routes are also proposed. This overarching landscape strategy provides an integrated network of landscaped green spaces.
- 13.14. The proposed Masterplan would help to transform what is currently a relatively incoherent and confusing estate layout into a clearer and more logical movement framework. This would be orientated around key pedestrian desire lines towards the high street, Silver Street Station, railway footbridge and key gateway to the south towards High Road Tottenham.
- 13.15. The proposed Masterplan is based on robust urban design principles and objectives in terms of creating a highly legible and permeable layout of streets and public squares centred on a strong landscape-led vision for the Site. The overall master planning approach is strongly supported and would respond positively to the site constraints and opportunities. A street-based approach with perimeter blocks creates a legible, human scaled proposal with a strong public front and secure private amenity. This can generally be seen to comply with LP2021 Policy D3.

Scale and Massing

- 13.16. The scheme proposes a transformative change, given that the scale and character of development is completely different from the existing estate. Variation in heights across the scheme would be provided with buildings ranging from 2 to 26-storeys. The edges of the Site are generally of a lower form, forming a contextual relationship with the existing built form.



Image: Building heights (storeys and meters)

- 13.17. The design includes towers marking key nodes in the development and the gateway to the Site. Within the masterplan, Blocks D & F and O & P would sit as pairs and form a 'primary network' of 19 and 26 storey towers alongside a 'secondary network' of taller buildings including 16, 17 and 18 storey buildings, discussed in further detail below.
- 13.18. Within the centre of the Site, the shoulder height of blocks adjacent to the park edge would be generally 8 to 10-storeys to create a sense of enclosure of this large linear public space. The "shoulder buildings" (Block K, N, J, L, B, H) are of an appropriate height given their park setting, with more open views to define the new open space. The height of these blocks is considered acceptable within the adopted and emerging context of the scheme. The massing of blocks facing the park edge would be varied with taller elements located on block corners to mark east-west public routes. These are predominantly one or two storeys above the general datum of an area, rising to three storeys above the datum in specific cases.
- 13.19. The general height along the northern section of Fore Street has been set at four storeys with a rise to five at the junction to College Gardens and a step down to one where meets Block E meets the public house along Fore Street. In

the southern part of Fore Street given the existing taller prevailing buildings, the height is proposed at eight storeys on the western side.

- 13.20. Block N will be the first block built fronting Fore Street and be part 6, part 8 storeys. It will re-introduce a sense of enclosure to the townscape and, in conjunction with later phases, will help to re-instate a consistent linear streetscape to Fore Street whilst also reconnecting it with High Road (within Haringey) which represents townscape improvement.
- 13.21. Around the general perimeter of the masterplan heights drop down to between three and five storeys to respond to their specific context such as existing terraced houses or heritage assets. The proposed blocks to the western, northern and eastern edges of the Site respond positively to the surrounding context and to the site's changing edge conditions and characteristics. To the northern part of Fore Street, the maximum heights are not overbearing on the high street (due to being set back from it) or an out of context jump in height from their surroundings.
- 13.22. Overall, the proposed scale and massing is a positive change, given the poor quality of the existing estate and its combination of open, unusable open space. Generally, the scheme proposes a new scale of development, with strategically placed taller buildings and other blocks more evenly spread across the Site stepping away from the high street and reinforcing the historic route of Fore Street (except for Block O and P).

Tall Buildings Assessment

- 13.23. *Policy Context:* Detailed and Outline consent is sought for a range of typologies which vary from 2-26 storeys in height. In terms of overall height, the proposed buildings as part of the hybrid scheme would consist of up to 26 storeys (Detailed, Phases 0-3) and up to 19 storeys (Outline, Phases 4-10). In the detailed phases this would comprise Blocks A, D, N and K. The majority of the buildings would constitute a tall building for the purposes of assessment.



Image: Axonometric of proposed height and massing (detailed blocks in purple)

- 13.24. Joyce and Snells Estate is indicated as a 'transformational area' in the Draft Enfield Local Plan (ELP). The site has been identified to support new housing through intensification and high-density development and as potentially an appropriate area for tall buildings, along with indicative maximum heights. The Draft ELP suggests appropriate locations for tall buildings, expressed on an area basis, by identifying tall buildings through existing typologies or those at appropriate transport nodes. The policy also seeks to set out the definition for tall buildings in various areas given the varied typology in the borough.
- 13.25. Those heights are suggested at 45m (14/15 storeys, max.) subject to criteria within the policy and other material considerations. These height parameters have been informed by the "Character of Growth" (CoG) study as part of the evidence base for the Emerging Plan.
- 13.26. In addition, the Draft ELP proposes an area-based policy in relation to the wider Angel Edmonton area, setting out the aspiration for the wider area. It is likely that any proposed tall buildings will need to be supported by a wider place-based analysis included within any emerging masterplan to justify how the location of tall buildings within the scheme takes into consideration the local plan evidence base. Limited weight is given to the Draft ELP, given its early stage in the adoption process, although it does represent a direction of travel for this Site.
- 13.27. 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.
- 13.28. The London Plan (LP) is the most recent and up-to-date part of the development plan. The other design policies in the LP, mentioned above, are taken forward in Policy D9. First, the policy deals with the principle of 'Locations'. Boroughs should determine if there are locations where tall buildings may be an appropriate form of development and that any such locations and appropriate tall building heights should be identified on maps in Development Plans. Tall buildings should only be developed in locations that are identified as suitable in Development Plans.
- 13.29. Paragraph 3.9.3 of the LP states that "tall" is defined as buildings that are:
1. substantially taller than their surroundings and cause a significant change to the skyline;
 2. but that are not less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. The LP goes on to state that in the absence of a local definition, its policy applies to buildings in excess of this height.
- 13.30. The policy then goes on to deal with 'Impacts' and says that schemes should address firstly visual impacts notably the views of buildings from different distances. In long-range views, attention needs to be paid to the top of the building – it should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views. In mid-range views,

attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions, and materiality. In immediate views, attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character, and vitality of the street. Where the edges of the site are adjacent to (of relevance in this case) buildings of significantly lower height, there should be an appropriate transition in scale between the tall building and its surrounding context.

- 13.31. LP Policy D9 then sets out that whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan. Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. The buildings should positively contribute to the character of the area.
- 13.32. While the site is identified in the Emerging Draft Local Plan as an appropriate location for tall buildings (expressed on an area basis), the adopted Development Framework does not identify the Site for the placement of tall buildings (other than the location identified at Bridgeport House). The proposals therefore cannot meet the requirement (Part B) of the London Plan.
- 13.33. Based on recent case law, no wording indicates that Part A and/or Part B are gateways, or pre-conditions, to proposals for tall buildings being assessed under Part C (Impacts). Where a tall building/buildings does not comply with paragraph B(3), because it was not identified in the development plan, in accordance with the objectives of Policy D9, it is acknowledged, the proposal may be assessed by reference to the potential impacts which are listed in Part C of Policy DP in the London Plan. Discussed below are the 'Impacts' of the proposed tall buildings:

London Plan Policy D9 C. 1) Visual Impacts

a) The views of buildings from different distances

- 13.34. The TVIA, in conjunction with Volume Two of the ES and the ES Addendum (coordinated by Land Use Consultants) and Chapter 12: Historic Environment and the Heritage Assessment provides a thorough study of the current townscape condition of the Site and its context. It identifies the townscape and visual receptors potentially affected by the Proposed Development of the Site and provides assessments of the effects. The potential visual effects of the completed Proposed Development on 64 local and distant townscape (AVRs) from 52 viewpoints (with night-time and summer variations) were assessed.
- 13.35. Tall buildings are proposed in the detailed and outline elements of the scheme. Whilst a number of tall buildings are proposed within the outline element of the scheme, the applicant's TVIA includes fully rendered views. This shows the impact of the illustrative scheme, with taller elements in the outline application rendered. This is welcomed and has enabled officers to undertake a detailed assessment of the potential overall visual and cumulative impacts.
- 13.36. The detailed 26-storey tower (and 13 storey wing) are evident from several views in the TVIA. Block D is formed of red bricked work and has open corners with balconies, partnered with Block F with an asymmetrical emphasis. There

are views from the east and west where the stark nature of the change in scale and height are fully visible. These change the understanding of the place and create a change in the relationship along the railway line. However, this also draws attention to and improves legibility of the town centre by highlighting its location from other regeneration areas such as Meridian Water to the east and the Selby Centre to the West.

- 13.37. These proposed towers to the western side of the Site (Blocks D and F) would be seen alongside the existing towers present at Cannons Road, also noting the emerging context which includes a number of tall buildings permitted within the High Road West scheme. In conjunction with High Road West, the area is identified as an area of transformation and with a new character area created and landmark buildings as set out would likely project above the prevailing roofscape in any event. Brooke House is an extant element of High Road West with consented tall buildings further south. Blocks D and F are set against the western edge off the masterplan and would follow similar principles, in this regard, and follow this 'line' of tall buildings adjacent to the railway. In these views, the development as a whole and the taller buildings would be viewed as a continuum of taller elements which line the railway in these views with the heights generally stepped down towards more sensitive locations along Fore Street / High Road.
- 13.38. In terms of the outline element, whilst the southern end of the Site exhibits a degree of height currently, the proposed towers (Blocks O and P) would be apparent. As seen in the TVIA, Views 26-29, the towers would have a significant effect on the skyline, given existing long view, with only glimpses of Stella House. Block O would be the focus, in particular. This sudden change of height is considered to have some harm to the spacious and modest character of these areas. It is questioned whether to mark administrative boundaries in this way with built form of such great height is justified. The proposed buildings O and P would represent a substantial difference even in relation to the southern end of the Site.
- 13.39. The irregular hexagonal shape of the buildings O and P (southern gateway towers) are interesting and the building form slender. It is acknowledged that the location marks a change in direction of the road that creates a termination to views from the south, marks a transition from the High Road to Fore Street.
- 13.40. To visually break down the massing of these towers, the maximum parameters of the outline elements are drawn tightly to give a good indication of the buildings form and mass, along with rendered views. The chamfered and edged plan form and overall appearance proposed for the two southern gateway towers is supported. Alongside the proposed high-quality materials and detailing, this could ensure the provision of a distinctive pair of new towers marking views into the scheme from the south and looking south along the linear park. These indicate horizontal panels of terracotta coloured, high quality cast masonry, to, character and tone. Given the motif employed in their design and floorplan they would not appear to be slab blocks and articulation would be apparent in long views. Furthermore, the need to make the development viable and able to support the decant provision and uplift in affordable housing, height needs to be accommodated in some locations across the development. On balance the visual impacts are considered acceptable.
- 13.41. Within the Site the shoulder height of blocks adjacent to the park edge would be generally 8 to 10-storeys. This approach would create a sense of enclosure of this large linear public space. The massing of blocks facing to park edge would

be varied with taller elements located on block corners to mark east-west public routes. The width of the park allows the park frontage elevations to be taller proportionally and helps to enclose the space. The “shoulder buildings” (Block K, N, L, B, H) of an appropriate height given their park setting with more open views to define the new open space. The height of these blocks is considered acceptable within adopted and emerging context of the scheme.

- 13.42. In terms of cumulative effects, the TVIA identifies the majority of views would have a beneficial effect, when the proposed development is seen in conjunction with other cumulative developments. Seven effects were found to be neutral (Views 1, 2, 3, 4, 24, 37, and 41) and one negligible (View 49). In one case there will be no change (View 25) and in 21 cases there will be no cumulative effect.
- 13.43. Having carefully considered the proposals, including the submitted Environmental Statement (ES), Townscape and Visual Impact Assessment (TVIA) they demonstrate a general improvement in townscape terms from important views from the north and south and in the immediate vicinity of Fore Street. The linearity of Fore Street is reinforced by the removal of the existing blocks (which sit perpendicular to the route), and the visual impact of the taller buildings would be more reduced because of the overall massing strategy and the degree to which these buildings would be screened and shielded by existing and proposed new build blocks along the high street. The scheme would not affect any strategic views identified in the London Plan.
- 13.44. Where taller elements within the scheme would be visually prominent from the surrounding residential areas to the east and west of the Site, the TVIA demonstrates that these buildings would be viewed as attractively designed and visually prominent towers in the background context of existing views.
- 13.45. Officers consider that the Design Code submitted provides a suitable basis on which to develop RMAs for tall buildings in terms of advising on the approach to the base and top of tall buildings and the approach which should be followed in terms of articulation, detailing and detailed design and materiality. This includes matters relating to the functional design, layout, entrances, servicing, public realm and active frontages, in line with the Policy D9 criteria. Reserved Matters Applications should also be subject to further detailed environmental and townscape assessment and Design Review to ensure full compliance with London Plan Policy D9.

b) Spatial hierarchy of the local character and wider context and aid legibility

- 13.46. The design principle behind the towers in this case is a ‘primary network’ of 19 and 26 storey towers alongside a ‘secondary network’ of taller buildings including 16, 17 and 18 storey buildings, marking key nodes in the development and the gateway to the Site. Blocks D and F and O and P would sit as pairs, with differences in the towers heights and spacing between them to assist in legibility of the towers as a group in terms of height and massing with lower tall buildings located within the centre of the Site, enclosing key public spaces.
- 13.47. The proposed towers would be aligned with key east west route (Block D and F) and the southern routes (Block P and O). Block D (and F) is within the emergent tall buildings in the area and will function as a marker for Angel Edmonton, the crossing of the railway and the train station. Block D will be the tallest building within the masterplan and reinforce the emergent and existing spatial hierarchy, set away from heritage assets. Block D acts as a landmark standing above the

layers of development with clear lines over the bridge and from College Close. Heights are not overbearing, and tall buildings, notably in the outline element have the potential to be slender and elegant structures should the design intent be followed through. The applicant's height strategy assists with legibility, travelling to and within the Site, using taller buildings to mark important routes/uses. Taller buildings are in key locations across the scheme and mark key aspects rather than dominate the development.

- 13.48. The overall height and massing strategy is well considered and would ensure that taller buildings would contribute positively to the legibility of the area helping to sign-post key features of the movement network and reflecting pedestrian desire lines north-south and east-west. This includes reinforcing the legibility of the key gateway route into the Site from the west, as well as the legibility of the internal north-south green link, station access and the pedestrian footbridge over the railway. The impact because of the higher buildings is considered to be beneficial in offering landmarking to appropriate parts of the Site and its context generally.
- 13.49. Taller buildings would contribute positively to the legibility of the area helping to sign-post key features of the movement network and reflecting pedestrian desire lines north-south and east-west, notably links to the station access and the pedestrian footbridge over the railway. In relation to London Plan Policy D9, C, the buildings reinforce the spatial hierarchy of the context.

c) Architectural quality and materials

- 13.50. In the detailed element, the articulation of the façade of Block D in particular was subject to extensive reviews during the application process. Robust, durable and attractive facing materials comprising predominantly of brick are proposed with a varied palette of colours and tones for tall buildings within the detailed element Blocks A, D, N and K, (discussed in detail below). Good levels of detailing and depth are proposed within building elevations to provide articulation and interest and to emphasise the horizontal and vertical features of the facades and the base, middle and tops of buildings and key entrances. This represents good design. Along with the attractive and varied materials, this would create a visually interesting, varied and generally cohesive new place with a strong urban character whilst also responding positively to the existing and emerging townscape context.
- 13.51. The architectural, design and materials quality of the proposed tall buildings within the detailed element of the scheme is of high standard and would respond positively to the surrounding context, as demonstrated in the applicant's TVIA and CGIs.
- 13.52. The Design Code includes appropriate specifications and design rules for key features of buildings and land uses in different areas of the scheme, depending on the location of each block. This approach is supported and would provide a good basis for the delivery of an architecturally rich and interesting approach in terms of materiality and overall design quality. The whole scheme is underpinned by a set of Parameter Plans and Design Codes which will, together with the DAS, ensure that future phases of the development come forward in a cohesive way. The finish will be reliant on design quality being delivered and secured at Reserved Matters Stage. This should be informed by further detailed design reviews prior to RMAs.

d) avoid harm to the significance of London Heritage Assets and their settings.

13.53. This is discussed in further detail in the 'Heritage and Conservation' Section of the report. Overall, the proposal would cause 'less than substantial harm' to the setting of designated heritage assets in the vicinity of the site.

g) buildings should not cause adverse reflective glare

13.54. Glare usually resulting from a direct line of sight to a light source and the reflection from a light source is unlikely to cause a negative impact on the existing surrounding buildings. Possible glare issues for the train drivers could be found to the west of the Site due to the proximity of tall buildings to the train line. The position of the proposed buildings to the west of the Site is parallel to the railway line and the percentage of glazing proposed will be restricted to 30-35% of the external envelope to respond to the environmental requirements for energy and overheating. Therefore, the ES concludes there will not be a significant adverse effect and this consideration and is scoped out of the assessment.

13.55. For the Outline Application, it is not possible to assess either the light pollution of the potential for glare as a detailed design is required to locate the light fittings and the reflective windows. These effects will be assessed as part of any subsequent reserved matters application. As such, it is considered that the proposed development is not likely to give rise to a significant degree of solar glare as the buildings do not include large areas of glazing on the facades.

h) minimise light pollution from internal and external lighting

13.56. A lighting Assessment has been submitted. The Site will introduce new sources of light into the area. The site is categorised as Zone E3 (Suburban) and will remain as Zone E3 (Suburban) once the Site is operational. The Proposed Development will provide modern lighting that is both more efficient and designed to avoid obtrusive light. As set out in the TVIA lighting would be designed to minimise light pollution on the surroundings of the Site. It is considered significant light pollution would not arise.

Functional impact

13.57. The design approach to accommodating tall buildings is supported in terms of ground floor and podium elements which would successfully relate these buildings to the public realm and provide welcoming and easily identifiable entrances and active frontages.

13.58. The buildings have been designed to accommodate deliveries, servicing, refuse and cycle parking facilities and would ensure that the functional impacts are acceptable and would not undermine the quality of the surrounding public realm, which is generally of a high standard. For the outline buildings this approach would be secured as part of the detailed plans and compliance with the design code, with further detailed design assessed at RMA stage. The functional impact of the proposed tall buildings is acceptable.

Environmental Impact

13.59. Environmental impacts in terms of wind, daylight, sunlight and overshadowing have been assessed and have informed the design and massing approach. The

length, width and south facing orientation of the new parks, as well as the varied height and massing of buildings would ensure that these two main public spaces would achieve good levels of direct sunlight. Overshadowing and sunlight assessments have been provided to confirm that the levels of direct sunlight in these spaces is in line with the BRE guidelines.

- 13.60. As can be expected with a regeneration scheme of this scale, there would be some impacts on the daylight levels of neighbouring properties (discussed in detail below). However, the overall daylight levels which would be achieved and the impacts on the surroundings are considered to be broadly in line with other similar high density urban regeneration schemes such as this and do not give rise to an unacceptable level of harm.
- 13.61. The applicant's wind microclimate assessment shows that appropriate levels of pedestrian and cycle safety and comfort would be achieved in the detailed element within the public realm and there would be no major adverse effects. Landscaping conditions are proposed within the public realm to ensure comfortable seating environment which would be secured as part of the detailed landscaping schemes.
- 13.62. There would be areas around and on the outline blocks with unsuitable wind conditions and expected strong wind exceedances. These will be tested at detailed RMA stages to ensure all locations would have suitable landscape mitigation strategies. The cumulative environmental impact has been appropriately considered and tested. The environmental impact is considered acceptable subject to conditions.

Tall Buildings Summary

- 13.63. Where maximum heights are proposed these are used strategically across the Masterplan and in buildings of a high-quality design. In part, it is noted that this is to account for the requirement for additional homes to meet affordable housing targets and viability needs. At present, there is a conflict (with the out-of-date presumption against tall buildings) as set out in Policy DMD43 of the Development Management Policies and the approach taken by Policy D9C of the London Plan.
- 13.64. In such cases where there is a conflict in policy approach, Section 38(5) of the Planning and Compulsory Purchase Act 2004 sets out that where policies of the development plan conflict with each other, the conflict must be resolved in favour of the policy that is contained in the last document to become part of the development plan.
- 13.65. However, officers consider that the visual, heritage, environmental, functional and cumulative impacts are, on balance acceptable. The architectural and materials quality of the proposed tall buildings would also be acceptable, subject to further detailed assessment of the outline elements at RMA Stage. As such, the proposed tall buildings in the detailed and outline elements would meet the qualitative assessment criteria set out in Part C of London Plan Policy D9 and are considered acceptable.

Design of the Detailed Elements (Blocks A, D, N, K and T)

- 13.66. The detailed blocks will be delivered in phases (0-3) and will provide a total of 575 homes, community and commercial space. The detailed elements of the scheme include a range of building and block typologies that will make use of a combination of mixed-use high-street buildings, linear and mansion blocks, taller buildings and residential terraces.
- 13.67. Blocks A and D are located to the north of the Site, between the railway and the north-south route which continues from College Close to Joyce Avenue. The primary facades of these blocks face into the site. Block N, K and T are located to the south of the site. Block N is located between Fore Street and the park. Block K and T are located to the west of the new park with Block T also sitting along the railway. The detailed blocks have been informed by the design code and vice versa.

Block A

- 13.68. Block A is located within the 'Home Streets' character area, the part of the masterplan corresponding to the lower rise existing context. The Block is the enabling Phase 0, to be delivered without the demolition of any homes. It will provide the decant homes for the existing Wadham House with 50 homes.
- 13.69. Block A has two massing's, the taller mansion block (10 storeys) and lower wing of maisonettes and flat above (5 storeys). The flatted part of Block A frames the proposed pocket park around a Category A tree. The larger element of Block A, the mansion blocks comprise a gridded elevation that is generally symmetrical across the east and south elevations. The lower wing that steps from the terraced houses to the mansion block is presented as two vertical elements.



Image: view of Block A from the centre of the site

- 13.70. A more gradual transition along College Close elevation is evident. The building steps from 5 to 10 storeys. Entrance position to Block A is located to the pocket park to bring activation. The proposed facade treatment for the south and east frontages of Block A buff brick architecture, to ensure continuity with the existing setting, a strong bottom datum with darker buff brick which picks up the 2-storey datum of the existing buildings along College Close. The facade of each element is broken down into a more vertical expression by introducing a shadow gap.
- 13.71. A garden path gives access, to the rear communal gardens. There is concern over the efficiency and usability of the communal area to Block A which appears to mainly be circulation space rather than functional amenity areas. However, the block fronts onto a proposed pocket park.

Block D

- 13.72. Block D marks the east-west and north-south routes across the masterplan, as a gateway block adjacent to the railway. The block is the largest in the detailed phases and comprises different typologies. The tallest element is 26 storeys, together with linear blocks (part 8, part 13 storeys), which form a U-shape around a courtyard. Block D proposes 220 homes completes and frames the pocket park, facing Block A.



Image: view of Block D from the centre of the site

- 13.73. The tower marker building has a strong three-storey base achieved by a darker colour to the brick. Complementary brick band detailing is used to break up the buildings and to define the base, middle, and top. Additionally, a continuous band every six floors to give vertical order to the elevation and grouping of the windows. The east/west and north/ south elevations of the marker block are

treated differently, one more horizontal (north/south) and one more vertical (east/west). The top of the building is extruded on both east/west, orientating the building on the east west axis, to create a crown to the top of the building, which will be visible across the masterplan. The corners of the marker block are set back to provide metal balconies which expand the living areas into the outside. High quality brick details and a variety of metal work and glass reinforced concrete are proposed. These are deployed in a variety of ways which give the building interest and variety from short and far views. The base, middle and top are clearly defined and legible granting the building a strong character.

- 13.74. A key feature of the proposed windows is the reveal depth. This adds to the elevational relief and vertical shadow techniques utilised to articulate the façade of the building. The windows of the tower are grouped with metal spandrel panels to enhance the verticality of the building. This verticality is also achieved through the detailing to the vertical piers.
- 13.75. The northern building provides a similar treatment to Block A with its darker two-storey base and brick relief details to the upper storeys, along with shadow gaps to subdivide the elevation. Additionally, this building features bandings every two stories, further dividing the middle sections. The lower deck access building of Block D1 has a distinct treatment to differentiate the typology. Large, chamfered balconies pair the stacked maisonettes into smaller groupings to reflect their domestic scale.
- 13.76. The stacked maisonette typology (8 storey) has accents of domestic components throughout the street elevation. The maisonettes are organised as a terrace with a repetition of private paired entrances. The elevation treatment is a contemporary interpretation of the existing maisonette typology, deriving cues from the existing context. Vertical piers define 4 columns of maisonettes whilst big, chamfered balconies pair the staked maisonettes into smaller portions, giving their dwelling identity.



Image: Block D

13.77. The design of the entrances to private and communal elements as well as those to refuse and cycle stores have a clear hierarchy. Communal entrances are formed by a feature frame, that projects beyond the brick façade of the building and returns to the covered recess of the entrance.

Block N

13.78. Block N is a perimeter block, facing both the high street and park edge with a central courtyard surrounded by deck access. The building ranges from 6-10 storeys in height. Five retail units on the ground floor faces Fore Street. Car parking as well as ancillary spaces, such as plant rooms and bicycle stores, sit in the middle of the podium level. The prevailing material used within Block N is brick to tie into the masterplan materiality. Materials chosen for Block N are proposed to be robust and form a complementary palette of colours and textures.



Image: view of Block N from Fore Street

13.79. Facing Fore Street, the facade is proposed to be broken down into five different segments of varied roof profiles and brick colours, recreating elements of the high street. The overall width of the building is perceived as a composition of smaller masses. The buildings are defined by a variation in brick tone and bond that draws from the existing material palette on site. The ground floor would provide active frontage to the new area of public realm. The commercial units have been designed for Class E use and with shopfronts evenly spread along the Fore Street elevation.

13.80. Facing the park, this facade is split into two volumes, each with a different brick colour treatment, with the tallest massing towards the north. Maisonettes, face the park and wrap around the ground and 1st floors, and have access to the front and back private gardens. This elevation is the least successful of the detailed phases elevations as it is very similar to Block K across the park in colour. The facades are however well mannered and of equal proportion with communal entrances providing clear hierarchy.



Image: Block N from the centre of the Site

Block K

13.81. Block K is a perimeter block with a central courtyard and ranges from 5 - 10 storeys in height and fronts the park edge and Home Street. The elevations facing the Park Edge are proposed to be split into two and treated with different brick tones which highlight the difference in height. Both these buildings have a strong brick base datum defined by the maisonettes on the ground and first floors. In addition, vertically aligned projecting balconies are centred within the body of each building.



Image: Block K from the centre of the Site

- 13.82. The 'home street' facade is also divided into two elements with a clear central gap which corresponds to the communal staircase. The facade is proposed to be broken down by vertical recesses with recessed balconies which create a better and less overbearing relationship to block T across the road. Similarly, to the 'park edge' frontage, the top, middle and base are clearly defined by different brick tones and or courses.
- 13.83. The prevailing material used within Block K is brick to tie into the masterplan materiality. Materials chosen for Block K will be robust, well weathering and form a complementary palette of colours and textures.

Block T

- 13.84. Block T is located within the Home Street, adjacent to the railway and comprises ten houses and a flat block of 9 apartments. The houses are three storeys in height and the apartment blocks five storeys in height.



Image: Block T

- 13.85. Each house is provided with a front and rear garden, with additional amenity space provided through upper floor terraces and Juliette balconies. For the terraced houses, the brick articulation is a variation of that seen on the apartment block, with details like the corduroy along the parapets carried through. The sloping parapet is carried though on the apartment block also. Due to the domestic scale, window surrounds have been introduced to add depth to the facade and reduce the expanse of the White/Buff Multi Brick across the upper levels.
- 13.86. The elevation treatment to the apartment block is defined as regular vertical window bays with a sloping parapet with projected stacked soldier corduroy. To the main elevation stretcher course walls and stacked soldier banding are main features with red brick stretcher course to the ground floor.

Design and Townscape Summary

- 13.87. The hybrid application proposes a form of development that has been subject to scrutiny from the LPA, relevant stakeholders and the Design Review Panel. The

proposal would undoubtedly result in a change in scale when compared to the surrounding prevailing townscape. The Site provides an opportunity for a comprehensive redevelopment and there is a need to consider the scheme in its totality.

- 13.88. The proposed street layout promotes creation of safe, active, inclusive and legible streets within the proposed development that will connect well with the surrounding network. The architectural quality and materials are of a high standard. Its appearance would enhance the estate, improving legibility and definition of its urban spaces.
- 13.89. The proposed buildings would have highly articulated facades with a range of colours, tones and layers of depth that would be set out in well-proportioned facades and result in a high standard of architectural quality. This aspect of the scheme would have a beneficial effect on the character of the area.
- 13.90. It is acknowledged the southern gateway towers would be highly visible, in particular. Whilst higher than its surroundings in the immediate vicinity within the borough, the scheme accommodates the tallest buildings to the west and centre of the Site, and steps down in height to existing context thereby helping to achieve a neighbourly response within a high-density development. The proposals scale and height for the blocks depart from the Council's policy on tall buildings (which is out of date). The scheme would not accord with Policy D9(B) because no locations for tall buildings have yet been identified in Enfield and Policy DMD 43 of the Development Management Policies but is found to be in accordance with Policy D9(C).
- 13.91. Given the quality of the urban form including its contextual compatibility, the associated high architectural quality of the buildings, the quality of the open spaces adjoining the buildings, the proposal would meet the objective of achieving well-designed places. It would represent good design, in the terms of the NPPF. It would reinforce the spatial hierarchy of the locality and the architectural quality and materials would meet the requirements of Policies D9. The design would be visually interesting, well-proportioned and would generally enhance local character and would accord with LP21 policies GG2, H1, D3 and D9(C) which seek to achieve good design. These latter policies are given greater weight in the assessment and therefore the proposals would accord with the development plan.

14. Heritage and Conservation

- 14.1. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on Local Planning Authorities (LPAs) to pay special regard to the desirability of preserving the special architectural and historic interest of listed buildings and their settings. Section 72 of the same Act requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 14.2. Paragraph 199 of the NPPF states that great weight should be given to the conservation of a designated heritage asset when considering the impact on the significance of that asset and the more important the asset, the greater that weight should be. Paragraph 200 confirms that the significance of a designated heritage asset can be harmed by development within its setting.

- 14.3. Paragraph 202 states that where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use. Any harm to the significance of designated heritage assets must be clearly and convincingly justified and outweighed by the delivery of public benefits if it is to be in accordance with the NPPF. In the case of harm to non-designated heritage assets in accordance with paragraph 203, a balanced judgement will be required having regard to the scale of any harm of loss and the significance of the heritage asset.
- 14.4. Policy HC1 C. states development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.
- 14.5. Core Strategy Policy 31 requires development to enhance and preserve the boroughs heritage assets. Enfield Development Management Policy 44 requires applications to conserve and enhance the significance of heritage assets.

Designated and Non-Designated Heritage Assets (NDHA)

- 14.6. A designated asset is one which is on the Secretary of State's list of heritage assets and therefore of national importance. A non-designated asset is defined as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. (Para 30 NPPF). For example, one that is on the Council's own local list or even of some local interest but not on the national list. The Joyce and Snells Estate form a non-designated heritage asset and there are several designated heritage assets located in the vicinity of the Site.



Image: Designated heritage assets including Fore Street Conservation Area and The North Tottenham Conservation Area

14.7. The hybrid application has been informed by a Heritage Assessment, in line with paragraph 194 of the NPPF. The Heritage Statement identified several heritage assets within the vicinity of the development. The Conservation Officer has confirmed that the relevant heritage assets have been correctly identified by the applicant's heritage assessment and the following identified assets are most likely to be impacted by the proposed development are listed below:

- Joyce and Snells Estate (NDHA)
- Fore Street Conservation Area
- Angel Place (Grade II Listed)
- White Horse Pub (NDHA)
- St James' Church (NDHA)
- St James' Parsonage (NDHA)
- Edmonton County Court (NDHA)
- The Phoenix Public House (NDHA)
- North Tottenham Conservation Area
- Tottenham Cemetery Conservation Area
- 867 and 869 High Road (Grade II Listed)
- The Coach and Horses (NDHA)

Joyce Avenue and Snells Park (non-designated heritage assets)

- 14.8. The Joyce and Snells (Snells Park) Estate, an early comprehensive redevelopment scheme forms a non-designated heritage asset (NDHA). The site does not contain any designated heritage assets.
- 14.9. Snells Park Estate was part of an early post-war comprehensive redevelopment and was erected in 1957. The architect was T A Wilkinson advised by influential architect planner Frederick Gibberd. It is believed that Gibberd advised on layout and perhaps on architectural forms, but the detailed design and execution of the schemes may have been carried out by the Borough. The original Gibberd plan does not appear to survive, so his original intention is unclear.
- 14.10. Specifically, the six blocks in Langhedge Lane were finished in 1956. They have similar detailing to blocks on the Beaconsfield Estate, where Gibberd was also the adviser, and were presumably part of the original scheme. In the following year, three large 9-storey blocks - Boundary Court, Isis House and Regan House - were erected in a stepped layout, alongside Fore Street. To the south of Boundary Court, the entrance to the estate was marked by a typically 1950s modernist open portico, who also marked the boundary between the boroughs of Tottenham and Edmonton. In the centre of the estate is mixed development, some built circa mid-1960s, consisting largely of two-storey brick units but with one four storey block.
- 14.11. The connection with Frederick Gibberd gives the estate historic interest, even though there is at present no documentary evidence of Gibberd's proposals. The estate was clearly intended to be a landmark, placed at the boundary with two boroughs and with a symbolic gateway to the south of Boundary House, and on this account it has landmark value. The estate also has some urban design quality for the detailing of the six blocks in Langhedge Lane. The Heritage Review of Post-War Public Housing in the London Borough of Enfield (2017) report identifies the Snells Park Estate as having landmark status, urban design quality, historic interest and medium overall significance.

- 14.12. Given the above significance, the Snells Estate forms a non-designated heritage asset (NDHA).
- 14.13. Paragraph 203 of the NPPF states:
The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 14.14. Whilst this designation has been acknowledged by the applicant, Officers do not agree with the applicant's assessment that the overall value is 'very low' (in conjunction with the Twentieth Century Society). The demolition of the estate would cause very high and irrevocable harm by the loss of the non-designated heritage assets. Whilst the loss of the non-designated heritage asset recognised, the NPPF requires this harm to be balanced against the benefits of the proposal, set out below.
- 14.15. London Plan Policy H8 states that before considering demolition of existing estates, alternative options should first be considered, and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. The Twentieth Century Society object to the demolition of the estate and point to a recent appeal (APP/X5990/V/3301508) whereby Secretary of State refused permission to demolish the Marks and Spencer Building in London. The applicant's insufficient consideration of alternatives to demolition are stated to contribute to the reasons for refusal of the appeal. This was however subsequently overturned by the Court of Appeal.
- 14.16. In any case, alternative options were first considered and the potential benefits associated with the option to demolish and rebuild the Joyce and Snells Estate set against the wider social and environmental impacts. Feasibility studies were undertaken to consider three potential options. These included infill development, partial redevelopment and full demolition and redevelopment. The latter option was preferred by most residents and allowed for the most comprehensive approach to be undertaken.
- 14.17. In conjunction with the options appraisal and residents vote, several significant issues have driven the proposals for comprehensive phased demolition and redevelopment. These include the outdated design and layout of the estate which is lacking in legibility and is poorly connected to its surroundings. The layout of blocks has resulted in poorly defined areas of public open space, movement routes and surface car parking which lack natural surveillance. The areas of public open space are not fully optimised in terms of their use and function. Several of the blocks have recurring maintenance issues and require substantial investment to bring properties up to modern standards. Furthermore, the internal residential homes and communal areas are dated and do not meet modern standards in terms of insulation, energy efficiency and private outdoor space.
- 14.18. The proposal will help to maximise the overall housing, regeneration, connectivity, public realm and place making benefits. The site is a proposed site allocation (SA15) in the draft Enfield Local Plan. 32. Officers agree, that in this instance, the proposal for comprehensive redevelopment would be the most appropriate approach, particularly noting the phased single move approach

proposed which would minimise disruption for residents and seeks to retain households on the Site as it is redeveloped.

- 14.19. Having regard to the relative significance of the NDHA and scale of harm, this harm should be given moderate adverse weight and is set against the benefits of the scheme, which are considered to outweigh the identified harm. To mitigate this, a Building Recording Condition is recommended to be imposed given the proposed loss of the estate.

Setting of Fore Street Conservation Area (designated heritage asset)

- 14.1. The application site is immediately adjacent to the Fore Street Conservation Area (CA). The proposal would affect the setting of this CA. The special interest is derived from the inherent architectural value of historic buildings together with the sense of time depth they afford along a historic route into London.
- 14.2. Large sections of Fore Street are designated as a conservation area, which predominantly focuses on the historic buildings that front the street. Fore Street retains a number of good quality buildings which represent a diverse range of architectural styles and typologies and signify the evolution of the street. There is a variety of architectural styles and building ages within the conservation area, although building heights tend to be no more than three storeys.
- 14.3. South of the North Circular, the conservation area boundary is broken by modern development within the district centre, with an outlying southernmost part of the conservation area just to the east of the application site. Like the rest of the conservation area, this southernmost part contains a variety of historic building styles and ages. The County Court and 58 Fore Street (a public house formerly known as The Phoenix and now known as LT's Bar) are prominent and attractive red brick buildings that mark the entrance into the conservation area from the south.
- 14.4. The setting of the CA is largely a mix of modern development along Fore Street either side of the CA boundary and residential side streets to the rear. Tall buildings form part of the setting, particularly for the southernmost part. Silverpoint dominates views along Fore Street in either direction and encloses the southernmost part of the CA with a built form considerably taller than any of the historic buildings to the west and south. Within the southernmost part of the CA, 58 and 60 Fore Street are both locally listed buildings. No 58 is a late Victorian / Edwardian building. No 60 is tucked behind No 58 and is a narrow three storey stock brick building dating from the late 18th or early 19th centuries. Their significance is informed by their age, rarity and architectural quality, notwithstanding modern alterations and additions, with No 58 having additional social value as a historic public house.
- 14.5. The Fore Street CA 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. As such, the character, appearance and special interest of the Fore Street CA is considered extremely fragile.
- 14.6. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies.

- 14.7. *Detailed Phases (Blocks A, D, K, N and T)*: There will be no impact upon the Fore Street Conservation Area by the erection of these Blocks. It is noted, that if implemented consistently along Fore Street, the landscaping of Block N could in time deliver a very slight heritage benefit through unifying the streetscape and reinforcing its singular linear character (see later comments for weighting).
- 14.8. *Outline Phases (Blocks B, C, E, F, G, J, L M, O, P, Q and Temporary Community Centre)*: Whilst a scheme which maximises (or exceeds) the height parameters for Blocks C and E would be harmful, a detailed scheme which conforms to the submitted Design Code would likely enhance the Conservation Area. With regards to the NPPF, the benefit is likely to be moderate.
- 14.9. Based upon the Parameter Plans submitted, Block G is likely to result in heritage harm to St James' Church (former) due to the height and proximity of the buildings. This would also result in harm to the Conservation Area. Whilst it is challenging to assess the exact degree of harm for an Outline scheme, having regard for the mitigation embedded within the Design Code, the degree of harm is likely to be low (less than substantial).
- 14.10. The introduction of a high-quality civic building to Fore Street also has the potential to enhance the Fore Street Conservation Area. A detailed scheme which conforms to the submitted Design Code would likely enhance the Conservation Area. With regards to the NPPF, the benefit is likely to be modest.
- 14.11. *Fore Street Public Realm*: The proposed landscaping of the Fore Street public realm within and adjacent to the red-line boundary together with a Shadow Section 106 contribution to facilitate further public realm improvements will realise meaningful heritage enhancement to the Conservation Area. With regards to the NPPF, the benefit is likely to be moderate.

Angel Place

- 14.12. Angel Place is a Grade II Listed Building constructed in the mid-eighteenth century and formed of three connected two storey blocks with mansard roofs. Their special interest is derived from their architectural interest as well preserved mid eighteenth-century townhouses together with their historic interest as an example of development along Fore Street at a moment in time in response to social and economic changes at a local and regional level.
- 14.13. The erection of Blocks D (detailed) and B (outline) will have an urbanising effect upon the Grade II Listed Building Angel Place and will distract and distract from some views of the heritage asset. Whilst the negative impact can be reduced through a high-quality design there will remain a very low residual impact. The level of harm to the Grade II Listed Building as a designated heritage asset is at the lowest end of less than substantial.

White Horse Public House

- 14.14. The White Horse is an example of a purpose-built public house constructed in the 1950s and replacing an earlier pub on the same site. It has a moderate degree of heritage significance derived from its historic, architectural and communal value as a purpose built post-war public house. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).

- 14.15. Although an Outline Scheme, it can be reasonably concluded that a future detailed scheme for Block E which conforms to the parameter plans and Design Code would enhance the setting of the White Horse PH. This is a low heritage benefit which, having regard to the relative significance of the NDHA and scale of enhancement, is given modest weight.

St James' Church (former)

- 14.16. St James' Church was constructed 1850 in an early-English gothic style designed by Edward Ellis. It was converted to residential use in c.1982. It has a high degree of heritage significance derived from its historic, architectural and communal value as a place of worship for the community built in response to the growth of Edmonton following the arrival of the railway in 1849. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.17. Based upon the Parameter Plans submitted, Block G is likely to result in heritage harm due to the height and proximity of the buildings. Whilst it is challenging to assess the exact degree of harm for an Outline scheme, having regard for the mitigation embedded within the Design Code, the degree of harm is likely to be low.
- 14.18. Having regard to the relative significance of the NDHA and scale of harm, this should be given modest adverse weight.

St James' Parsonage (former)

- 14.19. The Parsonage associated with St James' Church was constructed 1868 in an early-English gothic style designed by Edward Ellis. It has subsequently (likely c.1982) been converted to apartments. It has a high degree of heritage significance derived from its historic and architectural value together with its group value with the former church. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.20. Based upon the Parameter Plans submitted and having regard for the mitigation embedded within the Design Code, Block G is likely to have a neutral impact upon the former Parsonage. It is acknowledged there is potential for Block G to enhance the former Parsonage.

Edmonton County Court and Phoenix Public House

- 14.21. The Edmonton County Court was opened in 1940 and is a handsome two-storey building of stone and brick. It has a high degree of heritage significance derived from its historic, architectural, and communal value as a local seat of justice which was designed to reflect the judicial system at that time. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.22. Known at LTs Bar, the public house was constructed in the late nineteenth century. Originally called The Phoenix, the building incorporates decorative plasterwork depicting phoenixes. It has a high degree of heritage significance derived from its historic, architectural, and communal value as a purpose-built public house. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.23. Based upon the Parameter Plans submitted and having regard for the mitigation embedded within the Design Code, Blocks to Fore Street are likely to have a neutral impact upon the County Court and Public House.

Setting of North Tottenham Conservation Area (Haringey)

- 14.1. The North Tottenham Conservation area includes a number of Georgian and Victorian buildings, some of which are listed and front the High Road and parts of White Hart Lane. The condition of the listed buildings in the conservation area varies and they are interspersed with poor quality buildings and structures.
- 14.2. A principal feature of the Conservation Area is the historic linear continuity of buildings on either side of the High Road and the character of the townscape, and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.
- 14.3. The North Tottenham Conservation Area has been identified as being in 'poor' 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. As such, the character, appearance and special interest of the Conservation Area is considered fragile. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies.
- 14.4. The proposed scheme, most notably Blocks O and P, would enclose outward views to north and would be a dominant feature of the townscape which would noticeably change the scale of development whilst also distracting and detracting from the architectural quality of the historic buildings within the Conservation Area. Having regard for existing and consented development in this area together with the quality of the proposed scheme the overall harm would be a moderate degree of less than substantial harm.

Tottenham Cemetery Conservation Area (Haringey)

- 14.5. The Site is within the wider setting of the Tottenham Cemetery Conservation Area. The character, appearance and significance of the Conservation Area is detailed within the associated Appraisal and Management Plan (July 2019). In brief, the Conservation Area is a good example of a Victorian cemetery built after the Metropolitan Interments Act.
- 14.6. Views out of the cemetery are very restricted as a result of significant tree planting within the cemetery and along its boundaries. Having regard for consented development in this area together with the existing tree planting and distance from the Site, the proposed development will not affect the character, appearance and significance of the Conservation Area.

867 and 869 High Road (Haringey)

- 14.7. Nos. 867 and 869 High Road were constructed in the early-eighteenth century and are collectively designated as a Grade II Listed Building. Their special interest is derived from their architectural interest as well preserved early-eighteenth-century town houses together with their historic interest as an example of eighteenth-century development along High Road which has been altered and adapted in response to social and economic changes at a local and regional level.

- 14.8. The erection of Blocks O and P will have an urbanising effect upon the Grade II Listed Building and will distract and detract from some views of the heritage asset. Based upon the Parameter Plans submitted and having regard for the mitigation embedded within the Design Code, the proposals are likely to have a moderate adverse impact upon the Listed Building. The level of harm to the Grade II Listed Building as a designated heritage asset is at the lower end of less than substantial.

The Coach and Horses (Haringey)

- 14.9. The Coach and Horses was constructed in the early nineteenth 19th century and has a high degree of heritage significance derived from its historic, architectural, and communal value as a purpose-built coaching inn. For the purposes of planning the building is considered a non-designated heritage asset (NDHA). The erection of Blocks O and P will distract and detract from some views. The proposals are likely to have a moderate adverse impact upon the NDHA.

Heritage and Conservation Summary

- 14.10. The proposals include substantial new buildings within the setting of designated heritage assets and the demolition of the existing estate. The redevelopment of this Site, also has the potential to realise significant heritage benefits to the Fore Street Conservation Area through removing low-quality twentieth century development and erecting buildings which are carefully designed to reflect the historic character, use, scale, grain and appearance of the CA.
- 14.11. Having carefully considered the proposals, including the submitted ES, TVIA and Heritage Statement, officers consider that the proposals would cause very high adverse harm to the Joyce and Snells Estate through its loss and redevelopment. Having regard for the scale of harm and the significance of this NDHA, moderate weight is given to this harm.
- 14.12. In addition, the scheme would result in a low degree of 'less than substantial harm' to the Grade II Listed, Angel Place, a low degree of 'less than substantial harm' to the Grade II Listed 867 and 869 High Road and a moderate degree of 'less than substantial harm' North Tottenham Conservation Area. Furthermore, because of the scheme's scale, construction will undoubtedly have a prolonged impact (from Phase 2 and Phases 6-10) upon the character and appearance of Fore Street CA.
- 14.13. Taking account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and paragraph 134 of the NPPF, the identified harm to heritage assets has been given significant weight and a balancing exercise against public benefit is required.
- 14.14. Paragraph 202 of the NPPF sets out where a scheme will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 14.15. The public benefits of the scheme are very substantial and as set out fully in the planning balance. These include, optimising the Site and making effective use of a brownfield site, supporting regeneration of Edmonton, much needed market and affordable housing delivery, new social infrastructure, economic benefits through job creation and spending of future residents and biodiversity enhancements. In addition, the proposal improved connectivity with a new

pedestrian crossing to Silver Street Station. Overall, Officers consider that the public benefits of the proposals, outweigh the identified harm and therefore the scheme complies with Section 16 of the NPPF.

Archaeology

- 14.16. London Plan HC1 indicates that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 14.17. The area around Fore Street is designated as Areas of Archaeological Importance. An Archaeological Desk-based Assessment was submitted in support of this application. Historic England (GLAAS) were consulted on the application and advised that, although little archaeology has been found in the area of the Site, it is recommended that an archaeological evaluation should be carried out to fully assess the archaeological potential of the Site.
- 14.18. A condition is recommended to require, first, an evaluation to clarify the nature and extent of surviving remains, and then, if necessary, a full investigation.

15. Quality of Residential Amenity

Unit size and Space Standards

- 15.1. London Plan policy D6 (Housing quality and standards) requires that housing developments meet the minimum space standards and also sets out a range of other requirements in relation to residential quality. Core Strategy Policy H5 seeks to ensure an adequate standard of accommodation to ensure satisfactory levels of residential amenity and quality of life for future occupiers.
- 15.2. Based on the submitted plans, all units in the Detailed element of the scheme either meet or exceed internal floorspace standards with respect of space standards for internal GIA, bedroom sizes, ceiling heights, storage provision and private amenity space.

Aspect

- 15.3. London Plan Policy D6 (Housing quality and standards) Part C states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy and avoid overheating.
- 15.4. 87% of the homes in the Detailed Element have two or more aspects. There are no single aspect north facing units. Of those units which are single aspect, the majority are 1 bed. The layout of the units has been optimised to enhance the overall number of dual aspect units while balancing the need to optimise density and to ensure a quantum of development to support viability. Given the majority of units are dual aspect, natural ventilation through opening windows is an inherent benefit and will provide relief from overheating for those units. The detailed element of the scheme is in accordance with LP D6.

- 15.5. The layout of the homes in the Outline element will be set out within future Reserved Matters applications. This will be based on the approved Design Codes and Parameter Plans. These set out that the block typologies should aim to maximise dual aspect units and achieve 100% dual aspect, where possible.

Private and Communal Amenity Space

- 15.6. All dwellings have access to a private amenity space in the form of gardens or balconies. Balconies comply with 1.5m depth and are commensurate size to the proposed occupiers. Balconies have been designed in the main to be projecting balconies to maximise daylight and sunlight availability to their private amenity spaces. This design feature should be considered in the overall assessment for internal lighting to rooms, discussed below. Where dwellings have private amenity in the form of balconies, there is access to communal amenity spaces in Blocks A, D, N and K which have a southern, eastern, or western aspect. Overall private and communal amenity space is considered acceptable.

Accessible Housing

- 15.7. Policy D7 of the London Plan states that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 of the Development Management Document has similar policy objectives.
- 15.8. In accordance with London Plan Policy D7, 10% of all homes within the Proposed Development will be built to M4(3) 'wheelchair user dwellings' standards. Within the Detailed Element (Phases 0-3), 10% (53) of the homes will be built to M4(3) standards. The remaining required wheelchair accessible homes (up to 145) are to be delivered within the Outline Element (Phases 4-10) and will be confirmed in future RMAs.
- 15.9. A condition has been included to secure that 90% of the units in the development must be provided to comply with Building Regulation requirement M4(2) 'accessible and adaptable dwellings across the scheme and 10% are M4(3) 'wheelchair user dwellings'.

Daylight and Sunlight to New Homes

- 15.10. The Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice (2022)' sets out the tests used to assess daylight and sunlight impacts of development on neighbours, future occupiers of the development and adjacent open spaces. The applicant submitted a Daylight & Sunlight Report (2024) with the results of each of the relevant assessment methods.
- 15.11. The proposed scheme has been developed and formulated over a significant period of time, in consideration of guidance relevant and appropriate at the time. The majority of the design period through pre-application stage was covered by the previous BRE Guidance, which was then superseded by the updated version in June 2022, whereby ADF was the relevant test for internal daylight levels.

- 15.12. The application includes a Daylight, Sunlight and Overshadowing (DSO) Assessment. Chapter 9 of the Environmental Statement provides details of the surrounding assessment.
- 15.13. *Internal Daylight Assessment - Detailed Element:* The Average Daylight Factor (ADF), the No-Skyline (NSL) and the Illuminance (SDA) tests have been carried out to assess the daylight availability within each habitable room of the detailed scheme. All habitable rooms have been assessed. 2,011 rooms in blocks A, D, K, N and T have been tested against BRE guides (2022).
- 15.14. The SDA results, which are the most relevant for assessing internal levels of daylight, under the current BRE Guidelines, show that 60% (1,213 rooms) of the assessed rooms in the detailed element, achieve the illuminance levels (SDA target). 140 failures are deemed marginal, meaning these rooms receive daylight level close to the satisfying criteria (within 10% below the target). In Block A 69% of the habitable rooms achieved the minimum illuminance levels, Block D achieve 81%, Block N 49%, 42% for Block K and 36% for Block T. Where illuminance levels are lower, Blocks N, K and T achieve 100% dual aspect units.
- 15.15. The reductions in daylight levels primarily stem from single aspect rooms facing the courtyard, rooms with balconies or deck access positioned above the main windows, and overshadowing caused by nearby outline buildings in close proximity to the detailed blocks. Deep rooms are naturally the most difficult rooms to achieve the required SDA levels. It is noted that in instances, units indicate a 0% figure on the SDA results. This should not be misconstrued as the room receiving no light at all, but rather this room does not meet the target value across any of the room. The room will still experience daylight pooling and an overall lower value across the room. Furthermore, an offset is normally required for the provision of balconies.
- 15.16. In a redevelopment scheme of this scale, deviations like this are inevitable. It is important that the results are considered flexibility. Overall, the development will experience levels of daylight lower than the BRE recommends. A comprehensive review of areas subject to transgression has been undertaken and these are balanced against other design related factors that will inherently cause deviations to internal daylight levels, such as the inclusion of external balconies. Whilst some of the proposed accommodation will experience lower levels of daylight, the majority of the units in the detailed phases are dual aspect (87%), with good outlook and no north facing units. The proposed units are considered to have reasonable access to light.
- 15.17. *Internal Sunlight Assessment - Detailed Element:* For new buildings, the BRE Guidelines refer to BS EN 17037 which says that a space should receive a minimum of 1.5 hours of sunlight on a selected date between 1st February and 21st March with cloudless conditions. The BRE document suggests 21st March be used. For dwellings, at least one habitable room, preferably a main living room, should achieve at least this minimum criterion and that at least one main window faces within 90 degrees of south. Whilst BS EN 17037 applies to all orientations, the BRE guidelines say that if the room faces north of due east or west, the criterion is unlikely to be met.
- 15.18. The south facing living rooms of all the detailed blocks have been tested. The Sunlight Exposure (SE) results show that 60% of the 174 tested living rooms achieve adequate sunlight throughout the year. The Annual Probable Sunlight

Hour (APSH) results show that 51% of the tested rooms achieve adequate sunlight through the year. 68% of the tested windows achieve acceptable results in the winter period.

- 15.19. The proposed massing is of a scale and height for it to be considered a dense urban development and therefore these deviations to the BRE recommendations are inevitable, balanced in the summary below.

Sunlight on the Ground

- 15.20. The BRE Guidelines state that it is good practice to check sun lighting of open spaces which would normally include: 'gardens to existing buildings (usually the back garden of a house), parks and playing fields and children's playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between non-domestic buildings and in public squares, focal points for views such as a group of monuments or fountains'.
- 15.21. The BRE guidelines states that to appear adequately sunlit throughout the year, at least half of an amenity space should receive at least 2 hours of sunlight on 21st March (the spring equinox, when day and night are roughly the same length of time).
- 15.22. The private and communal areas for the detailed element of the scheme have been assessed on 21st March (BRE recommendation) and 21st June (alternative target). In addition, the southern park area has been tested.
- 15.23. The results of the assessment below show that both the courtyard of Block D (space D-1) and block A (space A-1) meet the BRE target on 21 March. Space A-2 (the pocket park) marginally falls below (46%) the criteria on 21 March, however, given that there is a well sunlit open space in close proximity to Block A, the loss in sunlight availability will be compensated.
- 15.24. The two proposed courtyards to Blocks N and K would fall short of recommendation on 21st March. However, this is a typical occurrence of courtyard shaped blocks, which are enclosed. To compensate, these blocks have rooftop amenity spaces which would meet the minimum BRE recommendations and will be well sunlit throughout the year. In addition, there is the availability of suitably lit wider open spaces within the Site.

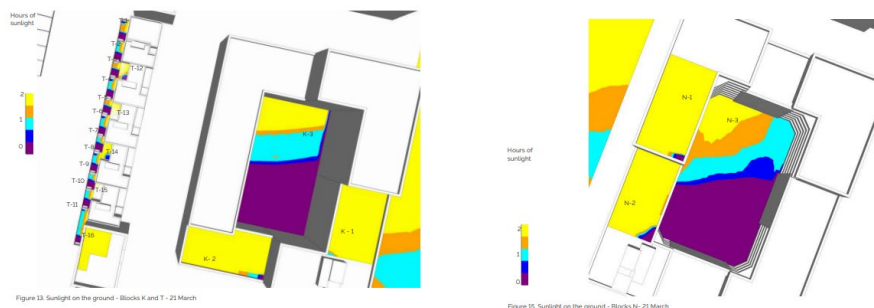


Image: Blocks K and N (detailed phases): 21st March

- 15.25. The private gardens for houses in Block T fall below the 50% BRE guide. This is largely due to fencing, allowing for privacy. However, there is access to open spaces located in close proximity of Block T (southern park) to compensate for the loss of sunlight availability in the back garden areas. The secondary terraces for Block A have good levels of sunlight availability on 21 March.

15.26. The results show there are instances where amenity areas, notably podium courtyards on 21st March are lower than what the BRE recommends. It is noted that there are public open spaces available nearby in excess of the BRE recommendations. All the proposed accommodation will benefit from private amenity spaces, which should have reasonable access to sunlight which does provide some offset.

15.27. Furthermore, there are improvements to sunlighting on 21st June, which is demonstrated in the results. During summer months where there is a greater expectation for access to sunlight, the proposed amenity provides enough sunlight hours for the majority of amenity areas. On balance, given the nature of the scheme and increase in density of development, the instances of underperforming spaces are not considered to be harmful, given the adequate and range of communal and public spaces within the vicinity of blocks.



Image: sun on the ground analysis

15.28. With respect to the Outline element, the areas of public realm are shown to perform well in terms of sunlight to the ground, as shown above. Communal

courtyards to Blocks J, H and B are likely to fail however, though more detail is necessary as part of future Reserved Matters applications. The indicative layouts and information contained within the Design Codes and Parameter Plans suggest the overall form of development that will be suitable in this regard.

Privacy and Overlooking

15.29. Policy D3 (Optimising site capacity through the design-led approach) states that development proposals should deliver appropriate outlook, privacy and amenity. Policy D6 (Housing quality and standards) states that development should demonstrate adequate privacy.

15.30. Within the Masterplan, the permitter block structure is a common arrangement of the proposed buildings. The principal privacy and overlooking relationships will be expressed between proposed new blocks. Massing is located towards the edges of the blocks. The streets and spaces within are defined by the line of the building frontage. The parameter plan below shows the relationship (detailed and outline) between residential building plots within the Masterplan.

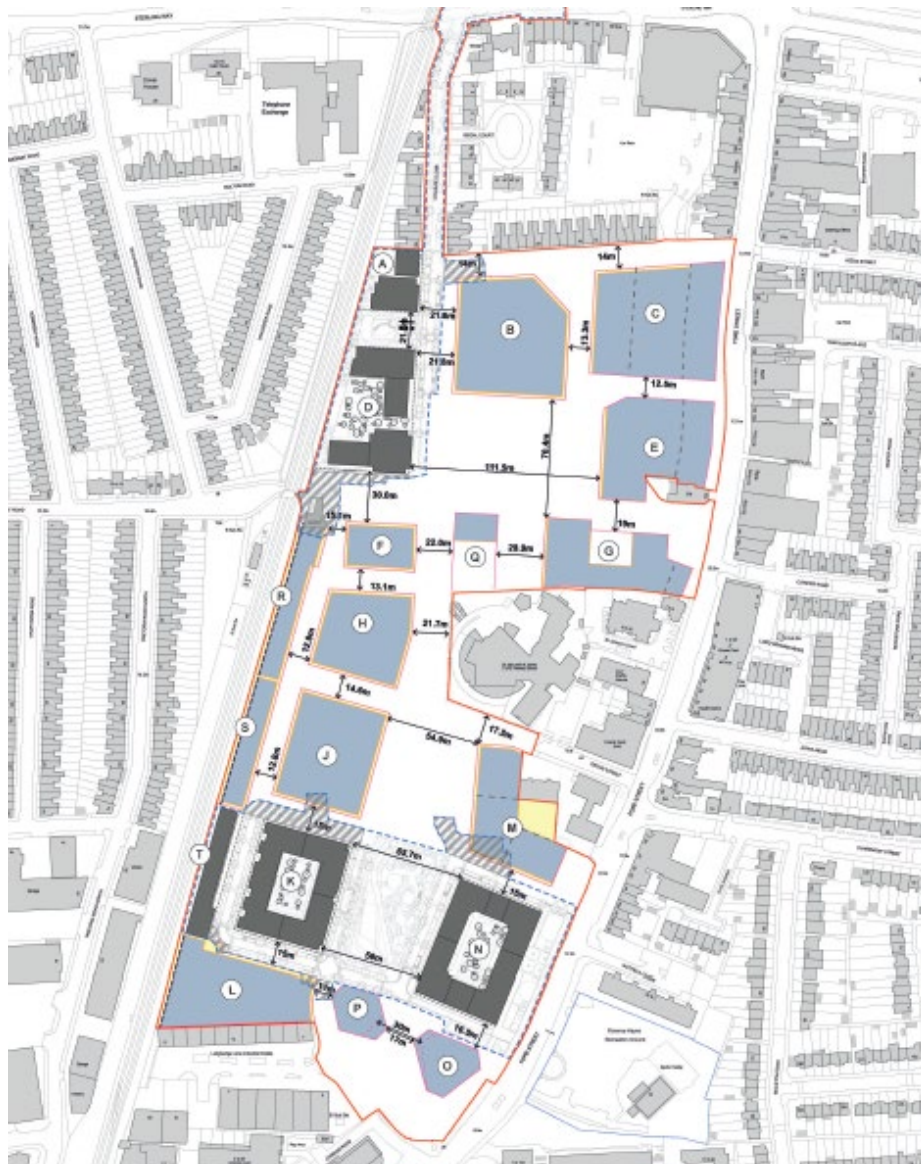


Image: Separation distances between blocks

- 15.31. Where blocks face adjoining blocks and the distance is less than 23m, overlooking would be over a highway and as such would not be contrary to policy. In addition to achieve appropriate townscape and public fronts and private backs, it is considered appropriate for buildings to enclose the public realm in this way.
- 15.32. Between courtyard/podium areas of blocks, distances would exceed 23m. Therefore, there would be no undue overlooking between proposed residents within proposed blocks.
- 15.33. The layout, footprint and built envelope of the masterplan has been developed to ensure privacy between new blocks once complete, and between new and yet-to-be-demolished blocks during construction. With a phased construction programme and phased decant plan, the proposed blocks would maintain an acceptable amenity impact in terms of overlooking.
- 15.34. In an urban context and in 'transformational area where growth is expected to be accelerated and density optimised, it is not unusual for separation distances to fall below 23m. Where these instances occur, this would be over public highway or public realm. On balance, the separation distances between proposed buildings are considered to be acceptable and usually are over a highway.
- 15.35. The proposed masterplan and the design codes include specific block typologies across the Site and will seek to manage principles for amenity, space and built form relationships as the Site is developed. Further, there are proposed codes for streets and spaces (movement and circulation), character areas and landscape and public realm. These include how proposed development will relate to existing buildings, streets and the edges of the site to ensure no undue overlooking.

Secured by Design

- 15.36. London Plan Policy D11 and Core Policy 9 promote the integration of design measures that create safe and secure environments for the community. This is seen as integral to good design.
- 15.37. The applicant engaged with the Designing Out Crime Office of the Metropolitan Police during the design phase, and Enfield consulted the Met during this application review.
- 15.38. The masterplan has been designed to alleviate antisocial problems which currently exist. The masterplans layout aims to be legible, landscape-led, improving connectivity within and through the Site particularly towards Fore Street, Silver Street Station, and over the railway line. It achieves spaces that are well-activated and overlooked with public fronts and private backs to buildings, addressing existing issues of crime and antisocial behaviour, and providing multi-functional and pleasant open spaces for residents. Furthermore, the proposed masterplan seeks to maximise defined active frontages, accessible and safe play areas.
- 15.39. As per the Secure by Design Officers comments, a condition is recommended to ensure appropriate standards are achieved.

Quality of Accommodation Summary

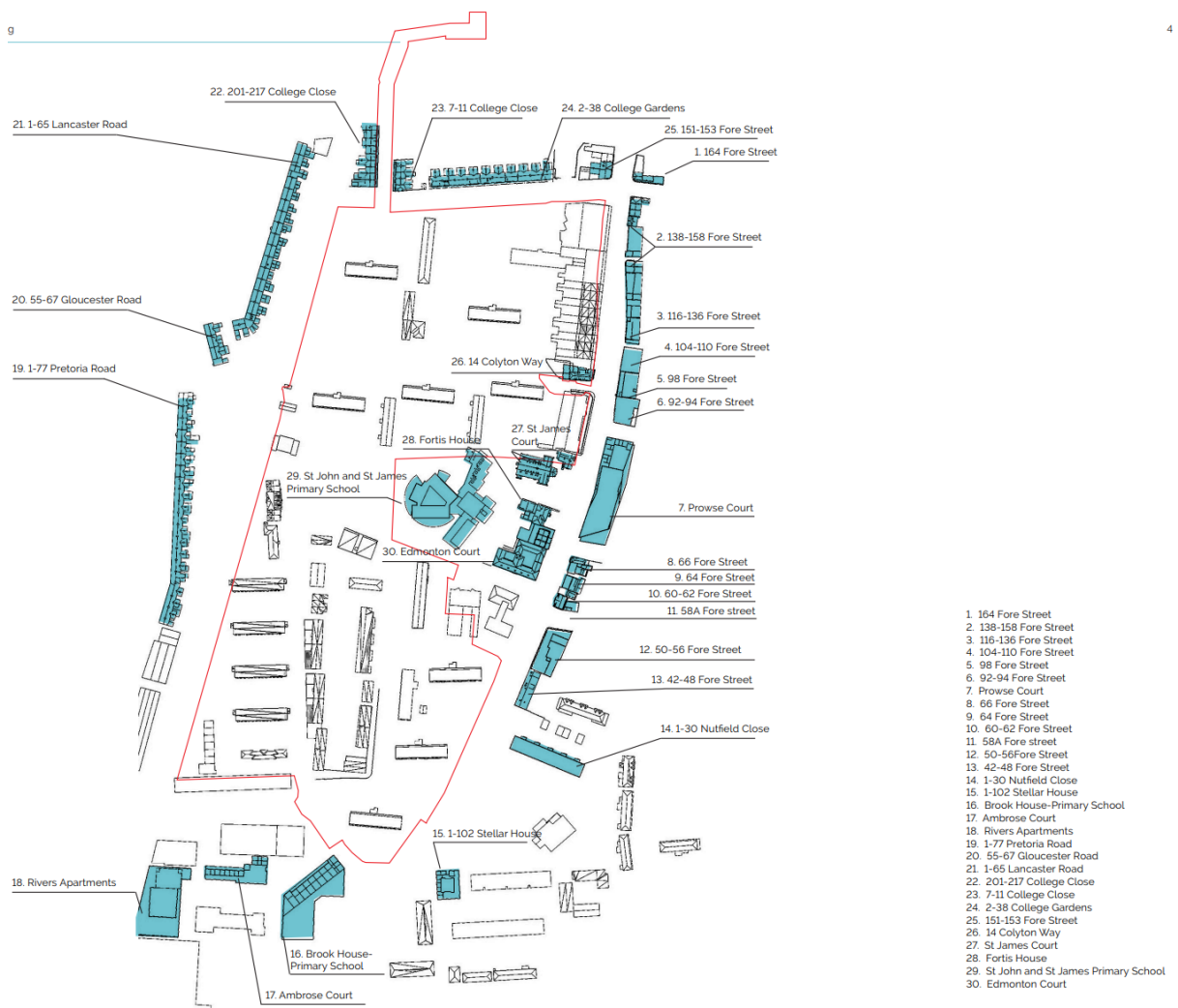
- 15.40. The daylight and sunlight assessment confirms what is expected in that there is a reduction in the amount of daylight available to homes in a denser urban environment and brings the estate closer to the design quality of traditional urban places, where greater extremes in daylight availability, particularly at street level, is a normal feature of urban living.
- 15.41. Some of the proposed units will experience levels of daylight lower than the BRE recommends. In relation to areas of transgression these are balanced against other design related factors that will inherently impact internal daylight levels. Whilst some of the proposed accommodation will experience lower levels of daylight/sunlight, these units will still have reasonable access which occupiers should be able to enjoy. The results demonstrate an overall, reasonable compliance rate. Overall, the majority, of the proposed units will receive sufficient sunlight, balancing the provision alongside overheating, noise, energy requirements, and elevation design.
- 15.42. Whilst a flexible approach is considered prudent to internal sunlight and daylight levels the transgressions are acknowledged and weighed in the balance of the application. Set against this, the provision for residents is considered to improve, in terms of the quality of internal spaces, good outlook, amenity space, energy efficient and high level of dual aspect homes.
- 15.43. In addition, the requirements of the development have been informed by viability, the need to replace existing buildings. This means that more housing is being provided to replace the existing buildings, at a higher density and greater building height, in part to alleviate the shortage of affordable homes and to rehouse existing residents in higher quality homes. The change of the estate from buildings in a landscape with poor supervision of external space and uncontrolled access to spaces between buildings, as well as exposed and insecure front and backs of buildings, to a design with a recognisable urban pattern of streets and parks, is a fundamental improvement in townscape terms.
- 15.44. Overall, the scheme has sought to achieve a balance between these competing factors as well as other planning and design considerations in order to deliver housing, which is of a high quality and sustainable. In terms of the Outline component, the space standards will be assessed in subsequent Reserved Matters planning applications.

16. Impact on Neighbouring Residential Amenity

- 16.1. All new developments are subject to an assessment of their impact on neighbouring amenity in terms of loss of daylight, sunlight, privacy, and an increased sense of enclosure. A development's likely impact in terms of air quality, dust, safety, security, noise, and disturbance is also assessed. In this regard, the proposal is subject to London Plan Policy D6.
- 16.2. Local Plan Core Policy 30 seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Local Plan Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

Daylight and Sunlight Assessment

- 16.3. The application is supported by a Daylight, Sunlight and Overshadowing (DSO) Assessment and Chapter 9 of the accompanying ES and ES Addendum. This summarises the levels of daylight, sunlight and overshadowing for the proposed homes and the wider effects on neighbouring properties.
- 16.4. The NPPF advises that weight should be given to the use of 'suitable brownfield land within settlements for homes...' and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.
- 16.5. A Maximum parameters (worst case) scenario has been assessed. This tests the development as built out to its fullest within the proposed parameters (and an interim scenario) which is the submitted indicative scheme. Major and moderate effects are considered significant in the context of the EIA Regulations. The ES identifies the following definitions for the predicted impacts on receptors and have been agreed with Aecom.
- Major (high) – less than 0.60 times former value (greater than 40% loss);
 - Moderate (Medium) – 0.60-0.69 times former value (31% to 40% loss);
 - Minor (Low) – 0.70-0.79 times former value (21% to 30% loss); and
 - Negligible – Typically greater than or equal to 0.80 times former value.



- 16.6. A total of 30 properties and 20 open spaces were considered as sensitive receptors. A total of 1,771 windows have been assessed for daylight. A total of 999 rooms were assessed for sunlight.

Daylight Assessment

- 16.7. The applicant's chosen methodology follows guidance provided in the Building Research Establishment's "Site Planning for Daylight and Sunlight" document (2022) and uses the Vertical Sky Component (VSC).
- 16.8. The BRE Guide explains that diffuse daylight may be adversely affected if, after a development, the VSC is both less than 27% and less than 0.8 times its former value. In situations where post-development VSC figures fail to comply with the levels suggested by the BRE, a further test can be carried out to measure the overall amount of daylight in a room. This is the Daylight Distribution (No Skyline, or NSL) test. BRE guidance state that if the NSL moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants.
- 16.9. A total number of 1,771 windows were assessed for VSC:

Property	Total No. of Windows Assessed	Beneficial (%)	Negligible (%)	Minor Adverse (%)	Moderate Adverse (%)	Major Adverse (%)
164 Fore Street	19	0 (0%)	19 (100%)	0 (0%)	0 (0%)	0 (0%)
138-158 Fore Street	32	0 (0%)	32 (100%)	0 (0%)	0 (0%)	0 (0%)
1160136 Fore Street	47	0 (0%)	47 (100%)	0 (0%)	0 (0%)	0 (0%)
104-110 Fore Street	4	0 (0%)	4 (100%)	0 (0%)	0 (0%)	0 (0%)
98 Fore Street	28	0 (0%)	28 (100%)	0 (0%)	0 (0%)	0 (0%)
92-94 Fore Street	11	0 (0%)	11 (100%)	0 (0%)	0 (0%)	0 (0%)
Prowse Court	213	0 (0%)	196 (92%)	13 (6%)	4 (2%)	0 (0%)
66 Fore Street	7	0 (0%)	7 (100%)	0 (0%)	0 (0%)	0 (0%)
64 Fore Street	4	0 (0%)	4 (100%)	0 (0%)	0 (0%)	0 (0%)
60-62 Fore Street	8	0 (0%)	8 (100%)	0 (0%)	0 (0%)	0 (0%)
58A Fore Street	18	0 (0%)	18 (100%)	0 (0%)	0 (0%)	0 (0%)
50-56 Fore Street	132	0 (0%)	132 (100%)	0 (0%)	0 (0%)	0 (0%)
42-48 Fore Street	36	0 (0%)	36 (100%)	0 (0%)	0 (0%)	0 (0%)
1-30 Nuffield Close	41	0 (0%)	41 (100%)	0 (0%)	0 (0%)	0 (0%)
1-102 Stellar House	221	0 (0%)	221 (100%)	0 (0%)	0 (0%)	0 (0%)
Brook House Primary School	51	0 (0%)	23 (45%)	4 (8%)	19 (37%)	5 (10%)
1-57 Ambrose Court	144	0 (0%)	85 (59%)	21 (15%)	22 (15%)	16 (11%)
1-100 Rivers Apartments	132	0 (0%)	132 (100%)	0 (0%)	0 (0%)	0 (0%)
1-77 Pretoria Road	135	0 (0%)	113 (100%)	0 (0%)	0 (0%)	0 (0%)
55-67 Gloucester Road	25	0 (0%)	17 (68%)	0 (0%)	0 (0%)	0 (0%)

1-65 Lancaster Road	118	0 (0%)	32 (27%)	20 (17%)	30 (25%)	36 (31%)
201-217 College Close	21	0 (0%)	14 (67%)	4 (19%)	2 (10%)	1 (5%)
7-11 College Close	13	0 (0%)	5 (38%)	3 (23%)	2 (15%)	3 (23%)
2-38 College Gardens	134	0 (0%)	0 (0%)	8 (6%)	36 (27%)	90 (67%)
151-153 Fore Street	10	0 (0%)	10 (100%)	0 (0%)	0 (0%)	0 (0%)
14 Colyton Way	7	0 (0%)	7 (100%)	0 (0%)	0 (0%)	0 (0%)
St James's Court	64	0 (0%)	49 (77%)	4 (6%)	4 (6%)	7 (11%)
Fortis House	13	0 (0%)	13 (100%)	0 (0%)	0 (0%)	0 (0%)
St John and St James Primary School	53	0 (0%)	38 (72%)	3 (6%)	1 (2%)	11 (21%)
Edmonton Court	30	0 (0%)	29 (97%)	1 (3%)	0 (0%)	0 (0%)
Total	1771	0 (0%)	1371 (77%)	111 (6%)	120 (7%)	169 (10%)

16.1. 1,371 (77%) windows assessed for VSC, would comply with the BRE criteria, once the development is complete. A total of 999 rooms were assessed for DD. The results of the assessment indicate that a total of 894 (89%) rooms would meet the BRE criteria.

16.2. Adverse effects regarding VSC are found for 12 of the existing buildings surrounding the Site that are being assessed as sensitive receptors. In total 169 (10%) windows display major adverse effects that are considered significant impacts, and 120 (7%) windows display moderate adverse effects. These negative impacts to adjoining occupiers are weighed in the summary.

Sunlight Assessment

16.3. A detailed analysis of the sunlight availability of the existing buildings surrounding the Site has also been undertaken. Of 999 rooms assessed for sunlight, 948 (95%) would meet the BRE criteria for annual APSH. On two existing buildings (Prowse Court (3 windows) and 1-100 Rivers Apartments (48 windows) surrounding the Site demonstrate major adverse effects regarding annual APSH.

16.4. Regarding winter APSH, in total 66 (7%) windows have major adverse effects that are considered significant impacts. These rooms relate to 14 existing buildings surrounding the Site. 933 windows (93%) demonstrate negligible impact.

16.5. These figures are based on the massing of the parameter plans. It is anticipated with further refining at RMA stage, 95% of nearby rooms would meet the BRE criteria for annual APSH and improve (94%) slightly regarding BRE criteria for winter APSH.

Overshadowing Assessment

16.6. The BRE guide recommends that at least 50% of the area of each amenity space listed above should receive at least two hours of sunlight on 21st March.

The 50% criteria mentioned above is also applicable when assessing the impact of a development on an existing neighbouring amenity area. If, as a result of a new development, an existing garden or amenity area does not meet the 50% criteria, and the area which can receive two hours of sunlight on 21st March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

Property	Total No. of Open Space Assessed	Beneficial (%)	Negligible (%)	Minor Adverse (%)	Moderate Adverse (%)	Major Adverse (%)
1-30 Regal Court	5	0 (0%)	5 (100%)	0 (0%)	0 (0%)	0 (0%)
5-6 College Close	2	0 (0%)	2 (100%)	0 (0%)	0 (0%)	0 (0%)
7-11 College Close	5	0 (0%)	4 (80%)	0 (0%)	0 (0%)	1 (20%)
201-217 College Close	9	0 (0%)	8 (89%)	1 (11%)	0 (0%)	0 (0%)
34-22 College Gardens	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
2-38 College Gardens	19	1 (0%)	19 (100%)	0 (0%)	0 (0%)	0 (0%)
1-65 Lancaster Road	33	0 (0%)	13 (39%)	9 (27%)	8 (24%)	3 (9%)
55-67 Gloucester Road	7	0 (0%)	7 (100%)	0 (0%)	0 (0%)	0 (0%)
1-77 Pretoria Road North	41	0 (0%)	40 (98%)	1 (2%)	0 (0%)	0 (0%)
Cannon Road	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
1-12 Fore Street	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
1-102 Stellar House	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
Edmonton Court	3	0 (0%)	2 (67%)	1 (33%)	0 (0%)	0 (0%)
8-12 Lord Graham Mews	5	0 (0%)	5 (100%)	0 (0%)	0 (0%)	0 (0%)
3-11 Alpha Road	5	0 (0%)	5 (100%)	0 (0%)	0 (0%)	0 (0%)
1-23 St Jame's Court	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
St John & St James C of E Primary School	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
Florence Hayes Recreation Ground	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
42-48 & 50-56 Fore Street	2	0 (0%)	2 (100%)	0 (0%)	0 (0%)	0 (0%)

1-30 Nuffield Close	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
Total	144	0 (0%)	120 (83%)	12 (8%)	8 (6%)	4 (3%)

- 16.7. There will be some impacts of overshadowing from the proposed development on a small number of existing buildings and amenity spaces. These impacts relate primarily to buildings proposed within the Outline element which have been tested against the maximum design parameters (i.e. maximum heights/scale etc).
- 16.8. Further mitigation can be achieved by consideration of massing and detailed design, within parameters established as part of the Outline element, which can be considered and re-tested at future Reserved Matters stage, including the potential to reduce scale and height where required.

Interim Position – Sunlight and Daylight Assessment

- 16.9. Within an EIA it is normal practice to test the baseline position, operation effects and cumulative effects. Given the duration of the build with some blocks remaining in situ on site, close to new blocks, it was requested that the impacts on sunlight and daylight be tested.
- 16.10. A daylight analysis has been carried out to assess the impact of the new development blocks A, D, T, K and N, on the surrounding existing properties that will not be demolished. The image below, shows the location of the existing buildings that surround the proposed development and whose daylight availability may be affected by the new blocks.

4.0 Impact Assessment: Interim Scenario



Image: interim scenario after completion of detailed blocks

- 16.11. A total of 264 windows were tested across five residential blocks. 52% of tested windows achieve VSC (Vertical Sky Component) values between 20-27%. Furthermore, 12% of the windows achieve VSC values between 15-20%.
- 16.12. It is noted that 1-19 Joyce Avenue (60 windows) and 254-342 Joyce Avenue (27 windows) would experience major losses (greater than 40% in VSC). 1-19 Joyce Avenue is planned for demolition in Phase 4 and 254-342 Joyce Avenue in Phase 6.
- 16.13. It is anticipated residents could live in these existing blocks for 5 years, in anticipation of decant and then demolition. Whilst harm in the form of loss of daylight is identified, it is anticipated this would not be on a permanent basis, given the planned phased redevelopment of the estate. In addition, the phasing has been planned to mitigate its impact on existing residents and allow for single decant and as such would not warrant reason for refusal, taking account the overall, significant benefits of the proposal.

Summary of Daylight and Sunlight to Neighbouring Properties

- 16.14. A comprehensive assessment of the proposed development on surrounding windows and rooms to nearby dwellings has been undertaken in accordance with BRE guidance and practice. It must be acknowledged that there would be impacts to neighbouring properties and that this is regrettable.
- 16.15. As set out, the majority of neighbouring windows would not see a noticeable reduction in sunlight and daylight. 1,371 (77%) windows assessed for VSC, 894 (89%) rooms assessed for DD, 948 (95%) rooms for annual APSH, 933 (93%) rooms for winter APSH and 120 (83%) open spaces assessed for SHOG on 21st March would comply with the BRE criteria, once the development is complete.
- 16.16. The BRE document offers guidance on generally acceptable standards of daylight and sunlight but advises that numerical values are not to be rigidly applied and recognises the importance of specific circumstances of each case. Urban developments are one example where a different approach might be justified. This is endorsed by the LP Housing SPG which calls for guidelines to be applied sensitively to higher density developments, taking account of local circumstances and the need to optimise housing capacity and the scope for the character and form of an area to change over time. This approach is relevant to the Site. The areas identification for transformation through high density housing development indicates a high scope for its form and character to change over the short and long term.
- 16.17. The policy and guidance are also clear where denser, urban schemes and tall buildings are proposed, an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the impacts of new development. Where the scheme underperforms against relevant targets, this reflects the scale of regeneration being proposed and the need for development intensification across the site to deliver high quality affordable housing.
- 16.18. The proposal would result in some significant individual reductions in daylight and sunlight levels, but this is almost unavoidable in achieving the policy requirement for high density development in an urban setting with significant constraints. This harm is recognised in the planning balance. The results are presented as a worst case. Further mitigation measures can be delivered

through the detailed design of the buildings developed within the proposed maximum parameters at outline stage.

Privacy/ Overlooking and Sense of Enclosure/Outlook

- 16.19. The proposed scheme will result in a series of new blocks across the Site. The proposed new buildings have been designed to address existing streets and public realm. The site is characterised by Fore Street to the east, the railway line to the west and College Close to the north.
- 16.20. Scale, form and height have been carefully considered with buildings responding to their contextual surroundings, notably along the edges of the Site. The majority of blocks respond to their context where typically, there is two storey housing to the north and west of the Site and 3-4 storeys along Fore Street in the east. Whilst there would be an increase in height and density on site, some blocks would potentially overlook a broad swathe of housing, however given the relative separation distances over the adjoining railway and roads between the new built form and the existing, it is considered no direct overlooking would occur, nor would there be an undue sense of increased enclosure. Overall, there would be no adverse impact in terms of overlooking or loss of privacy to adjoining occupiers.
- 16.21. Block A would adjoin existing two storey dwellings and have a particularly sensitive relation therefore to adjoining occupiers to College Close. No. 201 College Close currently has a blank side elevation with storey closet wing and sizeable ground floor addition.
- 16.22. The ground floor of the 5-storey element would abut this flank elevation and at ground floor exceed the existing rear building line of no. 201 with a higher and deeper rear massing. The proposal would be set off the boundary, giving some relief, however it would be appreciable, and it is considered there would be some harm to the rear ground floor outlook and amenity space of no. 201 in terms of increased sense of enclosure.
- 16.23. The main 5-storey element would not project beyond the existing two storey outrigger. However, at first floor level, two private amenity spaces are proposed, and these would be enclosed by a flank wall by 2.4m. This element would project beyond the rear building line of no. 201 at first floor level. The terraces within the first floor are part of a compact layout form that provides little opportunity for views of the rear elevations to adjoining properties to be obtained. Given the overall depth at first floor level, it is considered there would be no adverse impact in terms of loss of outlook or light.
- 16.24. The 10-storey part of Block A would be located perpendicular to the residential gardens of College Close and offer views to the rear gardens. The residential gardens are likely to be already overlooked and any increase, including from Block A would not be out of keeping within the urban context.
- 16.25. In terms of the Outline element, the indicative layout provides a good degree of comfort for the Local Planning Authority with respect to how the scheme will come forward. The design of the overall scheme, as evidenced within the illustrative Masterplan, the Design and Access Statement, and the Design Code, has been developed to ensure that none of the proposed units will have an unacceptable impact on other proposed units, or on existing dwellings/buildings on or adjacent to the Site and/or in the immediate surrounding area.

- 16.26. In general, the site wide design strategy has considered the strategic location of taller buildings along with the juxtaposition with existing dwellings/buildings adjacent. The proposed separation distances between the proposed blocks, coupled with the design approach taken to them, will ensure sufficient distances are maintained between buildings and mitigate against any direct or harmful privacy issues arising to neighbouring occupiers.
- 16.27. The Design Codes and Parameter Plans (providing 'up to' maximum parameters), which will form approved plans, will form a strong basis for the consideration, testing and refinement of future Reserved Matters applications, including the potential relationships between proposed and existing buildings. A Phasing Plan/strategy will be essential to ensure that the scheme comes forward in a suitable and coordinated manner, and within that it will be important to ensure that full consideration continues to be given to existing and proposed residential amenity.

Noise and Disturbance

- 16.28. The technical reports submitted in support of this planning application, including the ES, confirm that new residents would not be subject to undue noise impacts, subject to conditions related to the management of construction, operation of commercial uses and relevant noise controls and sound insulation.
- 16.29. The mixed commercial and residential nature of the scheme means that, subject to using planning conditions to limit hours of use of any commercial units and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents. The applicant's Outline Construction Environmental Management Plan also sets out minimum standards and procedures for managing and minimising noise during construction (which could be secured by planning condition).
- 16.30. Further information about the impact of the proposals in relation to noise and air quality, and the impact of surrounding uses on the site itself, can be found within the 'Noise and Air Quality' section of this report (below).

Neighbouring Amenity Summary

- 16.31. The site has been identified as being suitable for redevelopment and regeneration including the delivery of additional affordable housing. To achieve this, the design strategy includes the introduction of a higher density scheme.
- 16.32. The new buildings would for the most part be of a similar scale with the existing on the permitter edges and would re-define street frontages, where currently there is a lot of semi open space on site. Several competing considerations need to be weighed up when developing a masterplan that successfully optimises the most efficient use of brownfield and public sector land, whilst balancing a range of competing design and planning requirements. It has been critical in this instance to take a balanced approach to a series of constraints throughout the extensive design process including the need to optimise the number of homes and associated high quality open space.
- 16.33. The technical evidence demonstrates there will be harmful impacts because of the proposed re-development to certain properties, notably in relation to daylight and sunlight. These transgressions weigh against the scheme. The results are

shown, via the maximum of the parameter plans and it is expected further testing and mitigation of the outline elements can be undertaken as the scheme is developed out, in accordance with submitted Design Code.

- 16.34. Amenity impacts must be considered in the overall planning balance, with the harm weighed against expected benefit. There would be instances of harmful loss of daylight and sunlight to surrounding properties. There would be minimal adverse losses of overshadowing, outlook and overlooking. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents are acceptable, given the overall benefits that the proposed scheme would deliver.

17. Open Space, Landscaping and Trees

Open Space and Landscaping

- 17.1. London Plan Policy D6 sets out standards for housing quality and requires a provision of private open space to meet the needs of the new and existing occupants of the Site and Policy G4 encourages development to provide new areas of open space where possible. The London Play and Informal Recreation SPG sets standards of quantity and quality in the provision of new play spaces.
- 17.2. Enfield Policy DMD 71 guards against the loss of open space resulting from development unless the loss can be re-provided or mitigated. Policy DMD 73 further sets out the Council's expectations around the delivery of play spaces. The emerging Local Plan identifies the value of informal, doorstep and play-on-the-way spaces that are integrated into landscape design. Currently, there is 30,309 sqm of open space on the Site. 10,798 sqm is designated as Local Open Space. The application site is in an area of open space deficiency.
- 17.3. The Site is characterised by underutilised amenity areas, made up of grassland that do not fulfil a meaningful function for residents. There is a lack of definition of public, private, and communal space. Unrestricted public access to the communal areas at the rear of the blocks combined with areas of poor overlooking and natural surveillance along with a lack of identifiable 'ownership' has resulted in issues with anti-social behaviour, and the usability of these spaces.

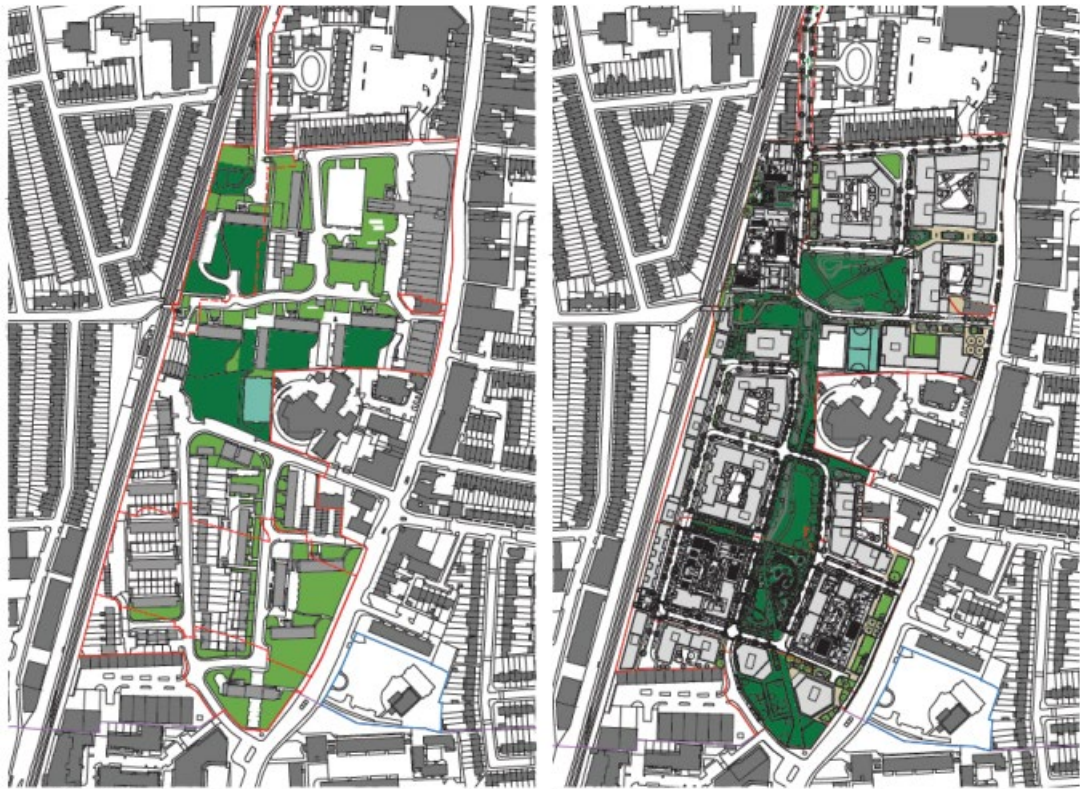


Image: existing and proposed open space

- 17.4. The Masterplan has been designed to rationalise the way that open space is provided, so that it optimises opportunities for outdoor activity, public health and townscape. The masterplan proposes:

Typology	Existing Provision (sqm)	Proposed Provision (sqm)
Open Space Parkland	10,798 (Designated POS)	20,930
MUGA	1,010	1,185
Soft Landscaping	18,501	5,800
Civic Space (Hard Landscaped)	0	2,420
Total Open Space	30,309	30,335

Table: Proposed Open Space

- 17.5. The southern portion of 'the Meadows' will be delivered between Blocks N and K and will deliver 3,560sqm of open park space, of which 1,950 sqm will be for play space and supported by a further 4,163 sqm of soft landscaping within the Detailed Element.
- 17.6. This will include a playground with bespoke natural play set pieces, with traversing level changes designed concurrently with the attenuation strategy. Amenity lawns provide areas for community gatherings and informal play, with dedicated play spaces for younger children. The ecological spine runs through the west of the space and includes woodland trails and attenuation swale.
- 17.7. Smaller pocket parks on the Site, also form part of the landscape programming in the Detailed Phases. A pocket park is located between Blocks A and D. This will provide amenity space for the adjacent blocks, retaining an existing

Category B tree. This space is divided into three areas dedicated to 0-4 doorstep play, social picnic space and a community growing garden.

- 17.8. In addition, the landscape and public realm strategy includes improvements to Fore Street. The public space to the front of Block N prioritises pedestrian movement whilst providing a plaza space. Spaces will be provided along the southern portion of the elevation to allow for spill out from the Block N retail units. Landscaping is proposed around the existing trees and will provide a green buffer between the high street and building elevation to Block N.
- 17.9. An open space phasing plan is to be secured to ensure delivery of requisite quantum of open space (namely, parks, playspace, public realm and private communal areas) within each phase and associated obligations securing delivery of the same at appropriate stages of the development linked with occupation of a certain quantum of dwellings. By the end of the Detailed Phases (Phase 3) the proposal will create play and amenity lawns along with improved connections to Silver Street Station and Pymme's Park.

Outline Element

- 17.10. New public realm areas are proposed which include the remainder of the park to the south of the site, additional public park (the Northern Grove) and a series of smaller pocket parks, a Civic Square, a School Square, and a plaza space to the south of the masterplan area by Blocks O and P.
- 17.11. Improvements to the public realm along Fore Street are proposed alongside improvements to the area leading up to the railway bridge, which will be connected to an elevated tree-lined walk and there will be a new pedestrian crossing on Sterling Way. Along with the improvements to access and open space, pedestrian-friendly green east-west and north-south connections into and out of the Site will be created to better integrate the Site with its surroundings and improve access to the newly created open spaces within the Site for the local community.
- 17.12. In total, 30,335sqm of new open space is proposed across the Site, which represents a net increase in open space on the Site. Whilst it is acknowledged there is a small quantitative uplift, there would be a significant qualitative improvement in open space with the quality of proposed open space expected to be markedly better than existing provision.
- 17.13. The Proposed Development would lead to a drop from 1.63ha per 1,000 residents to 1.59ha given the anticipated number of future residents on site. However, the proposal will deliver 20,930sqm of new public parks. The Site's ability to meet wider existing deficiencies in open space within the local area needs to be balanced against the established constraints, while meeting the need to maximise the delivery of housing and, new affordable housing.
- 17.14. In addition to open space provided on-site, the Proposed Development will contribute towards enhancements to Florence Hayes Recreation Ground, helping to enhance the quality of 6.24 ha of public open space, discussed below. The Proposed Development will also provide much improved access to Pymmes Park for residents by delivering a new signalised crossing to Sterling Way and associated public realm enhancements along College Close.

- 17.15. In the Outline Element, open space, public realm, street networks, street hierarchies and meanwhile uses during the phased delivery of the Proposed Development are also controlled by the indicative Phasing Plan and Parameter Plans. Future Reserved Matters applications will need to include information on open space, landscaping and public realm to ensure that the overall landscape strategy is fulfilled.

Open Space Summary

- 17.16. The Site's ability to meet wider existing deficiencies in open space within the local area is balanced against the established constraints, while meeting the need to maximise the delivery of new affordable and market family housing. The Masterplan has balanced the requirements for new built form with the delivery of new open space.
- 17.17. The proposed Masterplan has maximised opportunities for new open space provision through a landscape-led masterplan, delivering a net uplift across the Site that is providing a much-improved quality and function to the benefit of existing and future residents as well as improving existing play on and off site. The new open space created will be welcoming, interesting, useful and safe – and as such the scheme is considered to meet the requirements of Policies D6 and G4 of the London Plan, Policies DMD71 and DMD73 of the Enfield Local Plan.

Playspace and Sporting Improvements

- 17.18. Policy D3 requires proposals to provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity. Policy S4 requires for residential developments, incorporate good-quality, accessible play provision for all ages.
- 17.19. The GLA Population Yield Calculator is a tool for estimating population yield from new housing development. The calculator provides users with an indication of the possible number and age of children that could be expected to live in a new housing development of a given bedroom or tenure mix.
- 17.20. The 10 sqm per child benchmark should be set in the context of the overall open space requirements. Child yield is to be calculated for 0-17year olds (GLA Methodology 2019). The proposed estimated child yield is 1,010 and the required play space is 10,010sqm.

Age Group Years	Requirement (sqm)	Provision (sqm)
0 - 4	4,561	4,850
5 -11	33,390	3,880
12 -15	1,404	5,070
16 - 19	741	2,015
Total	10,096	15,815

Table: Proposed play provision

- 17.21. The Proposed Development incorporates 15,815 sqm 'playable landscape' across the Site, which exceeds the expected child yield required in terms of informal and designated play space and is therefore in accordance with London Plan S4.B(2).

- 17.22. Play spaces are designed to cater for a variety of age groups. All under 5's play will be provided on-site in the form of 'doorstep play' within each of the private communal block gardens. The designed 5-11's equipped play will be provided in the natural adventure playgrounds, and some informal play. The designed 12+ play provision will be provided on-site within the Meadow and the Grove Park areas and will consist of informal amenity spaces, in addition to the improved MUGA facility on site.
- 17.23. Overall, the Proposed Development will provide sufficient play space for the development and complies with the London Plan S4 and the London Play and Informal Recreation SPG.

Detailed Element (Phases 0-3)

- 17.24. The existing playground to the north-west of the Site is to be temporarily relocated to land immediately to the west of the St John and St James CofE Primary School, to reprovide play provision in the interim and facilitate the development of Block A within Phase 0 the Detailed Element, until such time that the first part of the Meadows is complete at the end of Phase 3
- 17.25. The Detailed Phases will deliver 3,560 sqm of open park space (the Meadows), of which there will be 1,950sqm of formally equipped playable space for older children aged 5-11 (0.2ha), with approximately 250 sqm attributed to doorstep play for younger children from 0-4 (0.03ha) which is considered acceptable.

Sporting Improvements

- 17.26. The proposed new units will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site.
- 17.27. As stated above a 1,185m² MUGA will be reprovided directly onsite, within Phase 4, replacing the existing MUGA and improving playing pitches provision locally. This will be accessible to the wider community, unlike the existing. Given the phasing of the construction there will be a period when this MUGA will be unavailable.
- 17.28. As such, a contribution has been secured to upgrade the existing MUGA in Florence Hayes, (directly opposite the Site) which has recently reopened. An offsite financial contribution (£500,000) has been secured to facilitate improvement to the existing MUGA and will be delivered prior to the commencement of Phase 4. By this time the southern portion of the Meadow will have been completed, delivering 3,560sqm of open park space.
- 17.29. The sequencing of the phasing has been done in a considered way to compensate for the short-term loss of the existing MUGA and to provide further improved sports facilities to residents. In light of the challenging viability of the scheme, which is shown in deficit, this level of mitigation is considered appropriate. In addition, the proposed development would offer improved access to Pymmes Park for residents by delivering a new signalised crossing to Sterling Way.

Trees

- 17.30. Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.
- 17.31. Policy DMD80 of the Development Management Document stipulates that developments should not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided. Additionally, Policy DMD 81 of the Development Management Document refers to landscaping.
- 17.32. The site currently has eight Category A trees, 59 category B trees and 148 category C trees. These have been categorised in terms of quality, maturity and health.
- 17.33. No Category A trees or groups are proposed to be removed. Within the Detailed Element, 13 Category B trees and 51 Category C are proposed to be removed.

	Existing	To be removed	Proposed	Net Change
Individual Trees	213	119: - 23 Cat B - 94 Cat C - 2 Cat U	820 - 334 in Detailed - 486 in Outline	+726
Tree Groups	22	8	N/A	N/A

Table: Existing and proposed trees

- 17.34. The Tree Officer notes the tree impacts are (without considering compensation) less than ideal. Around 40% of canopy cover is lost to the scheme. Some larger trees (Category B and C) are proposed for removal. The Category B trees over 50cm diameter have been reviewed and their retention is not feasible with the proposed layout and without a significant redesign. Overall, the Tree Officer has concerns that this may result in a two-tier age structure of the existing and proposed trees.
- 17.35. To offset the loss of existing trees, the landscape proposals include extensive tree planting across the whole Site as part of the landscape-led masterplan. This comprises approximately 820 new trees. 334 trees are to be planted within the Detailed Element (248 at ground level, and 86 at podium level) which will be located along all streets and roads and within all amenity space and public realm areas.
- 17.36. Overall, the number of new trees proposed to be planted represents an increase of 283% from the existing number of trees on-site and would substantially increase canopy cover and arboricultural value on the Site, significantly outweighing the proposed loss of medium and low-quality trees. This will create significant improvements to the current arrangement of trees across the Site and will lead to a net uplift in trees. Given the retention of the best existing trees, and

the large number of new trees to be planted, the loss of those identified existing trees on site is considered reasonable, in this instance.

- 17.37. It is considered necessary to secure a condition for a detailed tree planting strategy and plan to be included as part of the landscape proposals. A condition is also considered necessary to protect the existing trees on site, during the course of construction.
- 17.38. With respect to trees and their impact on biodiversity, (and while this matter is addressed in detail, below, in this report), despite the loss of mature trees and canopy size, the Biodiversity Net Gain Assessment submitted with the application indicates that there will be a 72% increase across the Masterplan. This is acceptable and would accord with London Plan Policy G6.
- 17.39. It is considered that, subject to appropriate mitigation, the Tree Officer is satisfied with the proposal. Conditions are recommended to demonstrate how the trees would be successfully protected throughout the site's development, and a planting plan/schedule and a landscaping specification to be provided including a scheme of aftercare and maintenance. Such details are considered acceptable in relation to trees and in line with relevant policies.

Urban Greening Factor (UGF)

- 17.40. London Plan policy G5 (Urban greening) states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 17.41. A range of urban greening methods are proposed as part of the applicant's landscape strategy. As set out above, there will be a significant increase in trees as well as hedges on the Site, and some of the space used for the proposed buildings would use extensive green roofs. In addition, the landscaping strategy includes semi-natural vegetation, rain gardens, meadow, lawn, and flower-rich perennial and shrub planting zones within the public realm and within podium courtyards.
- 17.42. The baseline Urban Greening Factor for the existing Site is calculated to be 0.26. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that both the detailed element and the scheme overall would achieve an overall UGF score of 0.45. This exceeds the benchmark in the London Plan Policy G5 and is supported.

18. Habitat Regulations Assessment - Impact to Epping Forest Special Area of Conservation (SAC)

- 18.1. There are two statutory designated sites of international importance with 10km of the Site. These are Epping Forest Special Area of Conservation (SAC) within 4.7km to the east and Lee Valley Special Protection Area (SPA) and Ramar, 1.7km to the east.
- 18.2. These are within the 3-6.2km Zone of Influence (ZOI) as defined by Natural England in their Interim Guidance (March 2019). The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland

Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation. The Lee Valley SPA and Ramsar is comprised of a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of manmade and semi natural wetland and valley bottom habitats.

- 18.3. As the Site is located within the vicinity of two internally recognised protected sites with multiple designations, it is necessary for Enfield as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63 (1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”).
- 18.4. Natural England wrote to relevant Councils on 20th September 2018, in relation to the establishment of the Epping Forest Special Area of Conservation (SAC) Strategic Mitigation Strategy. Natural England have established a recreational ‘Zone of Influence’. Any residential development (proposing 100 plus units) within 6.2km of the SAC is required to deliver a package of avoidance and mitigation measures as well as make a financial contribution to strategic measures as set out within the costed Strategic Access Management Measures. This is to adequately mitigate, on a site-by-site basis, any recreational impact on the SAC that is located within the Zone of Influence.
- 18.5. Natural England were consulted on this application and outlined the applicant should undertake a Habitats Regulations Assessment (HRA) as well as provide additional detail as to the avoidance and mitigation measures of the development. This work was undertaken by the applicant and submitted to Natural England.
- 18.6. The submitted HRA outlines the proposed measures delivered by this scheme to mitigate recreational pressure on the SAC, as summarised below:
 - Well-designed open space/green infrastructure within the development
 - Enhancements to Pymmes park trail
 - An agreed SAMM payment (to be secured within the shadow S106 Agreement).
- 18.7. The Council’s recently adopted Suitable Alternative Natural Greenspace (SANG) strategy relates to residential development which is granted planning permission after 1st April 2024. It is applicable to the proposed development. The charge is £353 per net additional/net gain in dwellings, and there is a £90 admin charge.
- 18.8. The masterplan proposes up to 2,028 homes and there are still 795 existing homes, the net gain in the number of homes is 1,233. Therefore, the charge per unit would equate to £435,339.
- 18.9. In this instance, rather than pay a SANG sum, key mitigation is proposed to enhance the nearby Pymmes Park and Pymmes Brook trail, to improve and create enhancements to the trail, to create a nature-based walking, recreational facility. Proposed measures include:
 - Entrance improvements to Pymmes Park, plus footpath enhancements, way finding and interpretation within the park
 - Wilbury Way Wetlands enhancements
 - Improved alternative link between Joyce Avenue and Snells Park Estates and Pymmes Brook Trail

- Blue and green features such as rain gardens and tree planting to minimise flood risk and enhance nature and amenity.

18.10. Natural England has reviewed the application and believes the financial contribution to the Council towards improving Pymmes Park and Pymmes Brook should be treated as mitigation. The applicant has confirmed funding to the delivery of these mitigation measures (£450,000), and this is to be secured through the shadow s106 agreement. Payment of this contribution will be at an early stage and paid in one installment such that detailed, consultation and delivery of the Trail project can take place in parallel with the detailed phases (0-3) and completed prior to the commencement of the outline phases (4-10) which is considered a benefit of the scheme. It is proposed that a Pymmes Brook Trail Management Plan is secured through the planning obligations. Furthermore, a SAMMS contributions is secured via Shadow s106

18.11. As such, the Local Planning Authority, as the competent authority, are satisfied with the conclusions and suitable mitigation measures outlined within the HRA. As such any impacts on the Epping Forest SAC or Lee Valley SPA and Ramsar are appropriately mitigated.

19. Biodiversity and Ecology

- 19.1. The requirement for biodiversity net gain is required by national legislation, namely the Environment Act (2021), which requires all development schemes in England to deliver a mandatory 10% biodiversity net gain to be maintained for a period of at least 30 years. BNG is mandatory for all applications submitted after 12 February 2024. This hybrid application was submitted in 2022.
- 19.2. The NPPF (Para.174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. At a regional level, policy GG2 of the London Plan requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.
- 19.3. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy GI4 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough. The emerging Local Plan, although of lesser policy weight, includes Policy BG3 which refers to a minimum of 10% net gain.
- 19.4. Core Policy 36 requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. DMD Policy 78 makes clear 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.
- 19.5. The application contains a Preliminary Ecological Appraisal, a Bat Survey Report, a Biodiversity Net Gain (BNG) Assessment, a Habitat Regulations

Assessment (HRA) Report and part of the Environmental Statement focuses on the ecological impact of the proposals.

- 19.6. The existing conditions on site consist of existing buildings, hardstanding and areas of mown grassland and scattered trees. These habitats are of limited ecological value and their loss would not be a constraint to the proposals.

Biodiversity Net Gain Assessment

- 19.7. The application includes a BNG Assessment, which supports and backs up the above consideration, and suggests that both the Detailed and Outline elements of the application will result in significant net gains with respect to biodiversity. Enhancements include tree planting biodiverse and intensive green roofs, rain garden, bioswale, native ornamental hedge planting, an orchard, shrub planting and modified grassland.
- 19.8. The proposals will result in a net gain for biodiversity units. This will result in a net gain of 78.01% for the Detailed phases and 69.72% for the Outline phases. The Masterplan would see an overall net gain of 72.21% which exceeds the requirement of 10% and is therefore in accordance with the above legislation and policy.

Protected Species

- 19.9. The vegetation on site is likely to be used by roosting birds. These could be disturbed if works are carried during the nesting season. This can be addressed by a suitable worded Construction Environment Management Plan for Biodiversity (CEMP – biodiversity)
- 19.10. In addition, one of the buildings on site was identified as supporting a breeding house sparrow colony with over 30 birds recorded during the survey. House Sparrows are listed on the Red List of the Birds of Conservation Concern. They are also listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and as such are a species of principle importance for the conservation of biodiversity in England (i.e. they are a priority species as per the NPPF). It is understood that the building hosting the sparrow colony will be demolished and the report includes a mitigation strategy that will ensure that alternative sparrow nesting boxes are provided on nearby trees and buildings prior to demolition and a condition will be imposed to ensure that this mitigation set out in the Ecological Appraisal is adhered to.
- 19.11. Following the results from the Ecological Assessment, emergence surveys on buildings identified as having bat roost potential were undertaken in the form of two bat transect surveys (Bat Survey report, Greengage, September 2022). The surveys were carried out from August to October 2021. No bats were observed emerging from the surveyed buildings, and low activity was reported during the transects (mostly foraging by common pipistrelle bats). The report concluded that roosting bats were considered likely to be absent from the Site. None of the trees have potential to host roosting bats. In summary the proposals are unlikely to affect roosting bats. However, it is considered necessary to condition bat surveys for future Reserved Matters applications for further checks.
- 19.12. The Ecology report and the Bat report states that bat and bird boxes will be included in the new development. These should be integrated into the buildings

and full details including elevations, numbers, locations, specifications and ongoing management should be secured via a planning condition.

Invasive Species

- 19.13. There are a number of stands of semi-invasive non-native areas of buddleia which would need to be removed in a manner that ensures that they are not spread into the wild. This is to be controlled via a Construction Environment Management Plan which will be secured by condition.

Biodiversity Summary

- 19.14. The application contains relevant supporting information and appropriate methodology has been employed in undertaking required assessments. The Masterplan will drive forward a 72.21% gain overall. Therefore, the application meets the requirements of the Development Plan with respect to targets for biodiversity and ecological preservation and enhancement and is in accordance with adopted and draft local plan policy.

20. Transport, Access and Parking

- 20.1. Section 9 of the NPPF sets out objectives for promoting sustainable transport. Paragraph 105 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 20.2. NPPF Paragraph 110 states that development proposals should ensure that appropriate opportunities to promote sustainable transport modes can be or have been taken up; safe and suitable access to the site can be achieved for all users; the design of streets, parking areas, other transport elements reflects current national guidance, including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 20.3. The London Plan 2021 Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. The Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership, and use, whilst at the same time increasing walking, cycling and public transport use.
- 20.4. Other key relevant London Plan policies include:
- Policy T2 – sets out a 'healthy streets' approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
 - Policy T3 – requires new development to safeguard sufficient and suitable located land for public and active transport;

- Policy T4 – calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and
 - Policy T5 – promotes the provision of an accessible and safe bicycle network with cycle routes and sufficient cycle parking;
 - Policy T6 – indicates that car-free development should be the starting point for all locations that are well-connected by public transport and requires parking bays for disabled persons.
 - Policy T7 – makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 20.5. Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices.
- 20.6. Core Policy 24 requires development to deliver improvements to the road network. Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling.
- 20.7. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.
- 20.8. The proposed development site straddles part of the A406 North Circular Road known locally as Sterling Way and Angel Road which form part of the Transport for London Road Network (TLRN). The site of the proposed development is also bounded by Fore Street to the east, which forms part of the Strategic Road Network (SRN) and includes highway within the Enfield network.
- 20.9. There are bus stops located on Fore Street, Sterling Way and Bridport Road, providing access to the 149, 259, 279, 249, 34, 102, 144, 444 and the 491 service. The nearest station is Silver Street, served by the Overground and to the north side of Sterling Way; and White Hart Lane Overground Station is also located to the south. The Overground viaduct is adjacent to the western of the Site. The Site falls within a Public Transport Accessibility Level (PTAL) of 3 to 5, on a scale from 0-6b, with 6b being the highest accessibility. Cycleway 1 is located north of the Site, 380m north of College Close and stretches west of the Site and continues south down to White Hart Lane Station. There is an Event Day CPZ in place in South Edmonton (which includes the Site) and runs from 12 noon to 9pm on event days only.
- 20.10. The application is accompanied by a Transport Assessment which provides details of the existing highways network and transport infrastructure as well as the existing and proposed delivery / servicing arrangement, car parking, cycle parking and pedestrian movements. The application is also accompanied by an Active Travel Zone audit with recommendations for improvements to the highway network following the principles of Health Streets Indicators.

- 20.11. The Site has a Public Transport Accessibility Level (PTAL) ranging from 3-5, indicating moderate to good accessibility by public transport. The northern part of the Site is within a 5-minute walking distance of Silver Street Overground Station, which runs a regular train service to Central London. Despite this relatively close proximity, the station is difficult to access from the Site due to the location of existing pedestrian crossings on Sterling Way and significant level changes. The southern part of the Site is approximately a 7-minute walk from White Hart Lane Overground Station, which operates on the same railway line as Silver Street Station.

Public Transport Impact

- 20.12. The applicants trip generation assessment has been undertaken following the methodology for the nearby Goodsyard and Depot applications in LB Haringey. TfL consider this approach reasonable.
- 20.13. Combined trips by mode for 'work', 'education' and 'shopping, leisure and personal business', have been estimated. TfL raised concern over the applicant's presentation of a reduction in trips, based on people working from home (WFH), in terms of its impact on local rail services and bus services. The applicant has provided a comparison of trips both with and without a work from home scenario. Where there would be no WFH reduction (the 'worst case' scenario), it is shown that the additional trips would have a minimal impact on the highways and public transport network. Both scenarios have been presented in the Travel Assessment, with analysis based on the assumption no-one works from home along with a 'sensitivity test' showing the WFH scenario. This analysis has been noted and agreed by TfL.
- 20.14. The site is located close to two London Overground Stations – Silver Street (to the north) and White Hart Lane (to the south). Given the proximity of the southern end of the Site to the White Hart Lane station (in particular blocks L, P, O, T, N, and K) it is anticipated that residents in these blocks are more likely to use the White Hart Lane station. It is anticipated there will be an additional 167 passengers in the AM peak and 157 in the PM at Silver Street Station and an additional 55 passengers in the AM and 52 in the PM at White Hart Lane Station. Both Overground stations, operate well within capacity and below the practical capacity at 85% when the proposed development is complete.
- 20.15. In terms of impact on bus capacity it is likely that there will typically be between four to eight additional passengers per bus. There may be up to 11 additional passengers per bus route 444 and this increase is considered low. These trips could be accommodated without the need for mitigation on public transport.
- 20.16. Transport for London have not raised concern regarding the impact surrounding public transport infrastructure in terms of capacity. Furthermore, TfL have confirmed the provision of complimentary bus priority measures on Fore Street and as part of the works on the A406 are not required to mitigate any impacts of the development.
- 20.17. Overall, it is considered that the proposed development will not have a significant impact on the operation of the local transport networks, taking into account other committed developments. As such there is considered to be no adverse impact on forecast demand on the public transport network in terms of local train stations, notably Silver Street Station and local bus services.

- 20.18. It is noted the new vehicle access onto Fore Street (between Block M and N) will impact on existing bus stops and will likely result in these needing to be moved. TfL has acknowledged this and would expect any works to TfL stops are designed in accord with TfL Bus Stop Accessibility Guidance and impacts to bus passengers are minimised. The applicant will need to agree separately the detail of changes to bus stop locations on Fore Street.
- 20.19. Overall, whilst TfL has raised concerns with some of the assumptions underpinning the transport assessment based on the reduction in trips based on people working from home, it is considered that the assumptions are reasonable and given the worst-case scenario there would be no adverse impact on local public transport services. Overall, TfL are satisfied that the proposed development would not have an adverse impact on the existing public transport network.

Healthy Streets and Active Travel Zone Assessment

- 20.20. Policy T2 in the London Plan, requires developments to show how they deliver improvements that support ten Healthy Streets indicators, reduce dominance of vehicles, and improve permeability by foot and cycle. The Transport Assessment (TA) mentions the poor quality and unattractive nature of pedestrian links between existing estates.
- 20.21. The applicants have submitted a Healthy Streets TA to demonstrate how the proposal adopts the Healthy Streets Approach and Vision Zero. It includes an Active Travel Zone (ATZ) assessment. With regards to the ATZ, TfL confirm that it was done in accordance with their methodology.
- 20.22. The whole site will be re-developed and the pedestrian links between the sites will be significantly improved. The key routes to main destinations have been assessed based on the 10 healthy streets indicators with the aim to reduce vehicle dominance and promote walking and cycling. The developments layout meets the healthy streets criteria, by providing planting, trees, benches cycle parking, raised table crossings, parking within the podiums to reduce vehicle dominance, pedestrian and cycle routes to improve permeability, as well as lighting and passive surveillance.
- 20.23. The ATZ identifies the walking route to the Silver Street station as one of the key routes for this development. TfL agrees that a new crossing of the A406 North Circular Road outside Silver Street London Overground station would benefit future residents of the proposed development as well as some existing users of the network, though there would be disbenefits to other road users including bus users.
- 20.24. The review of the proposals has been carried out based on the 10 Healthy Streets Indicators. Overall, the development and public realm ensures the layout and design is attractive and suitable for people who choose to walk, cycle and use public transport.

Access to the site

- 20.25. Access for pedestrians, cyclists and vehicles to the Site will be from Fore Street to the east, via Langhedge Lane; via Colyton Way (with limited one-way exit for vehicles) and via College Gardens. In addition, a new access road is proposed as part of the development between Blocks M and N.

- 20.26. Large vehicles including refuse, delivery and emergency vehicles can use Langhedge Lane, Grove Street, Joyce Avenue, College Close and College Gardens. Furthermore, there will be an access for pedestrians, cyclists, and vehicles to / from Sterling Way to the north via College Close, albeit with restricted access for vehicles from Sterling Way only. Bridport Road via Joyce Avenue will offer pedestrian and cyclist access only.
- 20.27. The internal road layout will include two-way streets, one way working streets and limited access one-way working streets for refuse and emergency vehicles only. Raised tables will be provided in appropriate locations to ensure that vehicle speeds are low and the roads are suitable for all roads users including vehicles, pedestrians and cyclists.

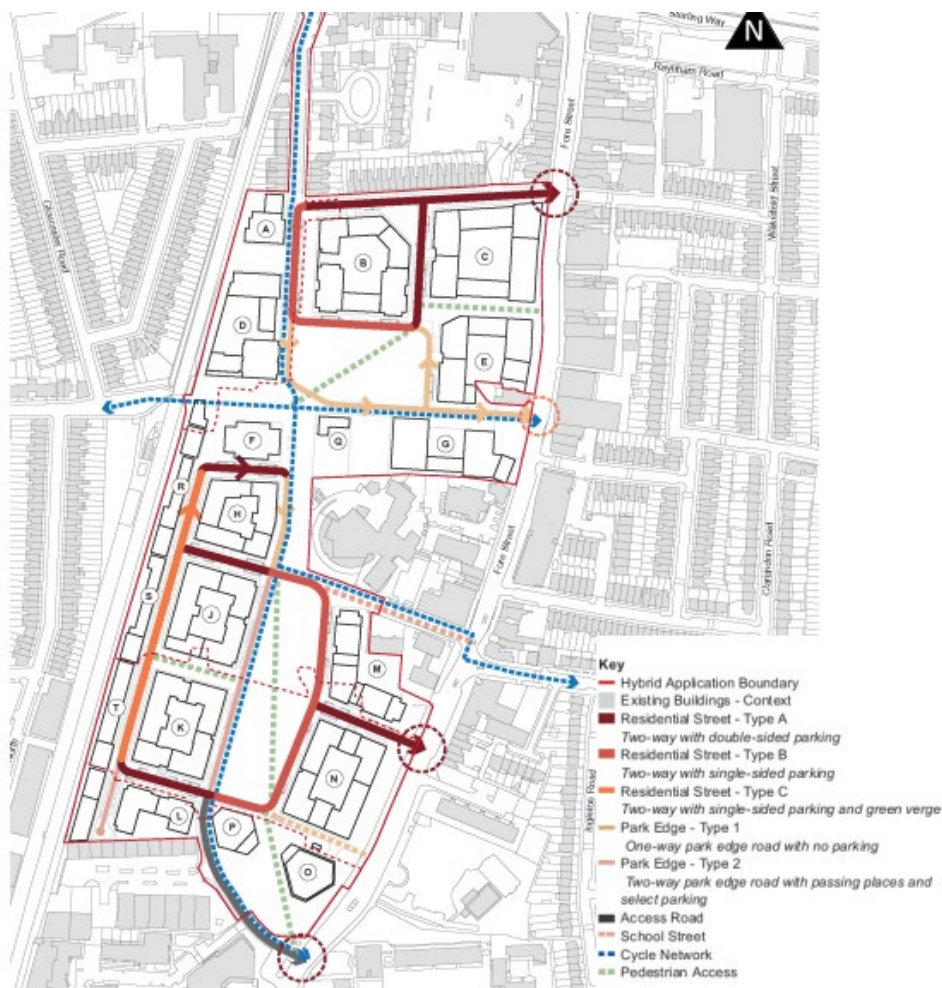


Image: Proposed Internal Road Network

- 20.28. Overall, the masterplan offers improved permeability through the Site, prioritising pedestrian and cycle routes north-south and east-west through the estate. This includes a new ecological spine route which would connect the southern entrance to the estate to Sterling Way via College Close. The new pedestrian crossing on Sterling Way would provide improved access to Silver Street Station (subject to this latter element being secured and delivered).

Car Parking and Measures to Reduce Car Dependency

- 20.29. London Plan policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. It goes on to state that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').
- 20.30. The TA provides a Lambeth Parking Survey undertaken on the 30th and 31st March 2022, covering all roads within 200m of the Site; this showed approximately 1,122 car parking spaces within the study area, of which 891 were occupied, equating a total parking demand of 79% in the wider area.
- 20.31. Parking Surveys show approximately 537 spaces on the estate. Car data from 2011 Census indicates car ownership is 0.45 per dwelling which equates to 360 cars. A total of 402 parking spaces are proposed across the Masterplan, of which 132 will be on street (including 55 Blue Badge spaces), and 270 provided in podiums (including a further 65 Blue Badge spaces). Two parking spaces are proposed for police use between blocks B and C.
- 20.32. The Site is proposed to have low levels of car parking, 0.2 cars per dwelling. The development would be 'car light,' meaning no new parking provided for the future residents (except for the Blue Badge Holders). Parking for existing residents would be re-provided, equivalent to 400 spaces. 2 spaces are for the Metropolitan Police. It is considered that this is sufficient to meet the needs of existing and future residents of the development and encourage the use of Active Travel modes.
- 20.33. The existing estate falls within an existing CPZ, with hours of operation on event days only (noon to 9pm). It is proposed that all internal roads within the estate (except for pedestrian footpaths) will be adopted highway (subject to approval) and it is anticipated that the hours of operation of the existing CPZ will be extended to a wider area to prevent unauthorized parking throughout the day (weekday and weekends). In practice, this will be managed by parking permits only being issued for eligible existing residents of the re-provided 795 dwellings. Residents of any new dwellings will be exempt from applying for a parking permit (unless they are blue badge holders). This will mean that the additional dwellings will be 'car free'. To ensure no undue pressure on parking, a CPZ recommended to be secured via the shadow s106 agreement and restriction on parking permits. This would ensure no additional stress on parking within the estate and wider area, restricting new units from obtaining parking permits.
- 20.34. Of the new 1,233 dwellings (net increase), 10% of dwellings will be designated as wheelchair accessible, which is equivalent to 123 dwellings. Therefore, the provision of 123 accessible spaces meets the Blue Badge parking provision (one space per dwelling for 10% of dwellings).
- 20.35. Given the outline nature of the remaining part of the Site, the parking requirements and distribution are not known at this stage. However, it is envisaged that the parking will be provided through a combination of on plot parking (basement/ parking courts/ podium parking) and street parking.
- 20.36. A Car Parking Management Plan (CPMP) is recommended to be secured by condition detailing how proposed car parking will be controlled, maintained, and managed for the residential units. Furthermore, a Construction Environmental Management Plan, details of EV and car club are recommended to be secured

by condition. A Travel Plan and CPZ, to restrict parking permits is necessary to ensure a modal shift towards walking and cycling and public transport and the new units are 'car free'. These are to be secured via the shadow s106.

Electrical Vehicle Charging and Car Club

- 20.37. In addition, the TA states that the London Plan requirement for 20% of parking spaces to have active EV charging facilities and for the remaining 80% to have passive charging facilities will be met.
- 20.38. It is anticipated that of the 132 on-street spaces, 20% of spaces (equivalent to 26 spaces) will be provided with active EV charging and the remaining 106 (80%) will be provided with cables (passive provision). Of the 270 spaces in podiums, 20% of spaces (equivalent to 54 spaces) will be provided with active EV charging and the remaining 216 (80%) will be provided with cables (passive provision).
- 20.39. It has been demonstrated there is sufficient EV charging for the parking proposed. For the detailed phases it is recommended these details are secured by condition. Owing to the outline nature of the remainder of the scheme, the detailed EV requirements and distribution are not known at this stage. The EV parking arrangements will be secured at reserved matters stage.
- 20.40. Car club bays are proposed, and these will replace some of the on-street parking in the future, details of these measures are to be secured in the CPMP.

Cycle Parking

- 20.41. London Plan policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle.
- 20.42. The detailed element, Phases 0-3, propose to deliver a total of 1,066 spaces. In Block A 97 spaces, Block D 413 spaces, Block N 263 spaces, Block K 252 spaces and Block T 41 spaces. In addition, a total of 82 on-street cycle parking spaces will be provided as part of the detailed blocks and a further 160 on-street visitor parking spaces will be provided as part of the outline blocks.
- 20.43. For the detailed phases, it has been demonstrated that an appropriate amount of cycle parking is proposed in relation to each block and use. An appropriately worded condition to ensure compliance with both quantity and qualitative standards for the detailed and outline elements is recommended to be secured.
- 20.44. Cycle parking for the outline element will be provided in accordance with the London Plan standards at Reserved Matters Stage.

Delivery and Servicing

- 20.45. London Plan policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing, and that provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 20.46. 22 delivery drop off zones are proposed, all within 25m of entrances to each block. Loading bays will be managed by Traffic Regulation Orders with a

maximum stay of 15 minutes and no return within 2 hours. It is considered that the number of delivery bays proposed is considered sufficient and would meet the demand for the predicted delivery and servicing trips.

- 20.47. The Transport Officer notes that as a result of some delivery bays (and 3m wide shared cycleway/footway routes) proposed on the estate, there is the potential for conflict between cyclist and loading/unloading areas. However, the TA sets out that the roads within the Site will be lightly trafficked, with the development as a whole generating approximately 30 vehicle movements (two-way) in each peak hour and up to 312 vehicle movements per day. It is predicted that the majority of delivery and servicing trips would occur between 10 am, 2pm and after 7pm.
- 20.48. In addition, the internal roads are designed with a maximum width of 4.8m wide carriageway (except for one-way streets which are narrower). This width is considered wide enough for a car to comfortably pass a cyclist on-street. Therefore, the roads will likely accommodate cyclists on-street and there is no requirement to provide dedicated cycle lanes. There will be dedicated drop-off zones located throughout the estate. Creating dedicated loading bays rather than allowing parking and unloading on-street allows kerbside activity to be focused on a particular location. This, therefore, reduces any points of conflict.
- 20.49. It is considered that the roads within the estate will therefore be able to accommodate cyclists without the need for creating dedicated cycle lanes. A Road Safety Audit (RSA) has been submitted for the internal road layout for pedestrian, cycle and vehicle access. This demonstrates any areas of conflict can be appropriately mitigated and indicates the layout to be safe.
- 20.50. There will be bin stores within 10m of the internal road network, and it is proposed to provide a dedicated service vehicle access to blocks N and O which were the two identified to be not within 10m of the road.
- 20.51. A Delivery and Servicing Plan and Waste Management Plan for each Phase of the development will be secured by condition. A condition is recommended to ensure that the detailed phase is implemented in accordance with the approved details and that details of the proposed refuse storage and collection arrangements for the outline phase are submitted prior to the occupation of the relevant parts of the development.

Travel Plan

- 20.52. The Travel Plan proposes reasonable and achievable targets to increase the use of sustainable travel modes among residents. The implementation stages of the travel plan establish a comprehensive approach to promoting and encouraging travel by sustainable modes. TfL welcome the appointment of a Travel Plan Co-ordinator to oversee, review and implement the travel plan. These measures are to be secured within the shadow s106.

Construction

- 20.53. London Plan policy T7 states that development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road. It goes on to state that Construction Logistics Plans will be required and should be developed in accordance with Transport for London guidance and in a way, which reflects the scale and complexities of developments.

- 20.54. A Construction Management Plan is recommended to be secured via condition to reduce the impact of both the demolition and construction phases. Measures to promote sustainable travel for the construction workforce should also be considered. The construction routes need to be agreed.

Amendments to Railway Bridge

- 20.55. The existing ramp leading to the footbridge over the railway line and to Bridport Road located at the centre-west of the Site. Currently the bridge does not have sufficient landing space and is not of an appropriate gradient.
- 20.56. As part of the improvements in connections and access across the Site, it has been identified to improve the railway bridge. This will occur in two steps. The existing steps leading to the bridge on its southern side will be removed first (facilitating space for the Energy Centre) and a temporary set of stairs placed to the north, adjacent to Block D, whilst the ramp remains in situ during the Detailed Element (Phase 0). When the block forming 254-342 Joyce Avenue is demolished in the Outline Element (Phase 4), the new elevated walkway and direct stepped access route is proposed to be constructed, and the temporary stairs removed.
- 20.57. The new 'Tree Lined Walk' will provide a new fully accessible 3.5m shared cycle footway that runs around existing retained trees. This new walkway is to be delivered in the early phases of the Outline Element and will connect to the existing footbridge over the railway line. This forms a key element of the new east-west link through the Site. Bringing forward the bridge in full and its detail is recommended to be controlled by condition in the relevant outline phases.

Amendments to Sterling Way/College Close

- 20.58. The Transport Assessment outlines, the proposed amendments to the Sterling Way/College Close junction. A new signalised crossing is proposed over Sterling Way.
- 20.59. The existing two-way operation on College Close is proposed to be changed to one-way only, with left turn only from Sterling Way to College Close. This arrangement will still provide access from Sterling Way for existing residents of College Close, as well as access for delivery and servicing vehicles. The purpose is to prevent rat running from Fore Street to the A406 while maintaining access to the estate and those existing properties on College Close.
- 20.60. The crossing is being designed and delivered by TfL and is to be jointly funded by the developer (50% of overall costs). The contribution would be provided in two instalments, with 25% of the contribution total to be provided when the developer starts on site for delivery of Phase 0. The second trigger would be 'by the end of May 2025 upon Council approval of budget for Block A. TfL have agreed the wording of both triggers, and these are to be secured in the shadow s106. The new crossing on Sterling Way would facilitate an easier and safer connection between the Site and Silver Street Overground Station and to Pymmes Park. Its delivery in the early phases is considered a significant benefit of the scheme.

Sterling Way/College Close Junction

- 20.61. The TA sets out when Phase 6 is completed and Block B is built College Close, will join College Gardens. The existing two-way operation on College Close will be changed to one way only, with left turn only from Sterling Way to College Close, providing access from Sterling Way for existing residents of College Close, as well as access for delivery and servicing vehicles. The majority of vehicles will enter and exit the site via College Gardens.
- 20.62. As part of Phase 0, an interim scenario for the College Close junction is proposed which sees the continued two-way operation of College Close alongside other highways works and improvements, including works to the footway on either side of the junction along Sterling Way to create a shared pedestrian and cyclist surface, an extension of the double yellow lines on College Close, planters and landscaping, and associated signage and kerb treatments. Further public realm improvements along College Close itself will be delivered later in the masterplan following the completion of Block B.
- 20.63. Stage 1 Road Safety Audits (RSA) for the development have been undertaken, on the LRTN network, including the proposed crossing across Sterling Way (to the east of Silver street Station), the proposed amendments on College Close/Sterling Way junction and the proposed junction on Fore Street and the detailed phases (0-4) of the proposed masterplan which is considered acceptable.

Other Matters

- 20.64. The TA refers to existing roads within the estate that will require stopping up, which are detailed in Appendix D. A stopping Up order will need to be applied for under section 247 of the Town and Country Planning Act 1990.

Transport, Access and Parking Summary

- 20.65. The proposed scheme improves connectivity for vehicles, pedestrians and cyclists. The scheme would be 'car light', only re-providing spaces for existing residents. The scheme would deliver a new north-south cycle link and a direct link to Silver Street Station, within the early phases of the development which is a significant benefit. The scheme would not negatively impact the existing road network, subject to the recommended planning conditions and s106 planning obligations referred to above. The assessment of likely cumulative effects, including taking account of likely public transport trips associated with the development on nearby development would be considered acceptable.
- 20.66. Having regard to the above assessment and subject to appropriate conditions and S106 obligations it is considered the relevant policy requirements in relation to transport have been met.

21. Climate Change and Sustainability

- 21.1. London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan's requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme's performance.

- 21.2. London Plan Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 21.3. The above policy also requires development proposals which are referable to the Mayor to calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 21.4. London Plan Policy SI 4 outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy.
- 21.5. NPPF Paragraph 157 outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.

Be Lean Savings

- 21.6. The Be Lean Requirement is proposed to be achieved through a combination of passive and active design measures. The proposals are expected to meet the London Plan policy target of 10% regulated CO₂ emission reductions for the residential portion and 15% reductions for the non-residential portion of the development. The measures to be implemented in the scheme include levels of insulation exceeding current Building Regulation requirements, the installation of high-performance glazing, energy efficient lighting and an efficient MVHR system for general ventilation purposes in all habitable spaces. The implementation of these measures would reduce regulated CO₂ emissions by 16% and 15% for the homes and the non-domestic areas respectively.

Clean Energy Savings

- 21.7. The scheme will be connected to the Meridian Water Heat Network to supply construction heat to the first phase of the nearby Meridian Water scheme. Energetik (the operator) is delivering lower carbon heat, and once connected to the waste heat supply in 2026, the heat will be delivered near to zero carbon, trending further towards zero as the wider grid decarbonises. The network has around 30,000 homes worth of capacity. The proposal for 2,028 homes does not raise an issue in terms of network capacity.
- 21.8. The network will provide the scheme with heating and instantaneous domestic hot water, without the need for hot water cylinders in each home. The connection to the network would reduce regulated CO₂ emissions by 75% and 44% for the houses and non-domestic spaces respectively, when compared to current Part L Building Regulations (2021).

Be Green Energy Savings

- 21.9. PV panels have appropriately been included on the detailed blocks. These have been maximised as much as practicable. In total 718 PV panels with 244 kWp

will be installed for use on the detailed blocks. PV panels will be secured as part of any future RMAs.

Be Seen

- 21.10. The energy performance of the development will be monitored and reported post-construction through the GLA's post construction monitoring platform in line with the 'Be Seen' policy and associated guidance and is pursuant to Shadow s106. Overall, the Joyce Avenue and Snell's Park Estates development achieves a reduction in regulated CO₂ emissions of 91% over current Part L Building Regulations (2013). This meets and exceeds the minimum 35% carbon reduction required by the London Plan. It should be noted that the scheme will be also meeting and exceeding Part L 2021 requirements, but detailed calculations will need to be carried out to define the actual performance.
- 21.11. For Reserve Matters Application an Updated Energy Assessment will be submitted. Depending on the outcome of this, the carbon offset figure can be amended, if necessary, on the basis that the obligation requiring the offset contribution can be suitably worded to enable this. This approach ensures the application is consistent with current GLA guidance and enables a review of the assessment against Part L 2021 (or as amended) prior to future phases of the development commencing.

Carbon Offsetting

- 21.12. Whilst the minimum required on-site reduction has been met, the submitted energy strategy demonstrates that the development as a whole does not meet the London Plan's "zero carbon" requirement.
- 21.13. If the net zero-carbon target cannot be met on site and the GLA is satisfied that on-site savings have been maximised, then the annual remaining carbon emissions figure is multiplied by the assumed lifetime of the development's services (e.g., 30 years) to give the cumulative shortfall. The cumulative shortfall is multiplied by the carbon dioxide offset price to determine the required cash-in-lieu contribution. Boroughs are expected to use the recommended carbon offset price of £95 per tonne of carbon dioxide, or to set their own based on local viability evidence. The site wide annual carbon shortfall of tonnes per annum of regulated CO₂ - will need to be addressed through a cash-in-lieu contribution (£153,457) to the Council's Carbon Offset Fund and secured pursuant to Shadow s106.
- 21.14. Further assessments will need to be carried out for the outline element to ensure on-site carbon reduction measures are maximised. Carbon Offset contribution requirements for future phases, as part of future Energy Statements will be secured in the shadow legal agreement.

Whole Life-cycle Carbon Assessment

- 21.15. The applicant has submitted a whole life-cycle carbon (WLC) assessment. The WLC assessment reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks.

- 21.16. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at the more detailed design stage when materials are being selected and specified. The WLC Assessment complies with London Plan Policy SI2. A condition is secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions.

Circular Economy

- 21.17. The embodied carbon from demolition is significant. A Circular Economy Statement has been submitted which outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting re-usability, adaptability, flexibility and longevity.
- 21.18. The Circular Economy Statement complies with London Plan Policy SI7. A detailed Circular Economy Statement is secured by condition for each Reserved Matters application. A condition is also secured requiring the applicant to submit a post-construction report.

Cooling and Overheating

- 21.19. Overheating modelling has been undertaken. A sample of domestic units were analysed, 10 out of 2000 units. Similarly, one communal corridor of Block A has been modelled as a worst case, due to its position (top-floor) and size (increased internal gains from pipes). The Sustainability Officer has expressed concern at the level of sampling.
- 21.20. The potential risk of overheating, as set out will be mitigated by incorporating passive and active design measures. These include minimising internal heat generation through energy efficient design of the energy centre and heat distribution network as well as using efficient lighting; reducing solar gain through optimising window sizes, uses of balconies and recessed windows to provide shading and internal blinds and low g-value glazing where necessary; and, mechanical ventilation heat recovery (MVHR) is proposed for all dwellings and commercial spaces throughout the proposed development allowing for the dissipation of any heat build-up during peak summer conditions.
- 21.21. The detailed scheme has maximised dual aspect housing (87%) and the potential for natural cross-ventilation of homes. Where windows are assumed to be openable without noise issues the overheating criteria would be achieved.
- 21.22. On specifically identified homes there are noise issues associated with the railway and adjacent roads which mean that the overheating assessment has needed to assume closed windows and active mechanical ventilation and cooling. This is acceptable given the noise assessment findings and overall acceptability of residential quality.
- 21.23. The results of the overheating assessment show that all domestic spaces, demonstrate compliance with the overheating criteria in line with London Plan's Cooling Hierarchy. Based on the overheating sampling size of units, it is recommended to condition an overheating assessment for any future RMAs.

Digital connectivity

- 21.24. A planning condition is recommended requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Sustainability Summary

- 21.25. The proposed buildings would reduce carbon emissions. Planning conditions are recommended to secure commitments in relation to water usage, BREEAM 'Excellent' for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network to help deliver a reduction in carbon emissions with offsetting financial contributions making up the shortfall, as such the scheme is considered in accordance with London Plan SI 2 and SI 4.

22. Air Quality and Noise*Air quality*

- 22.1. Policy SI1 of the London Plan set out the requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 22.2. At a local level, Core Strategy Policy 32 requires that developments improve air quality by reducing pollutant emissions and public exposure to pollution. Policy DMD65 of the Development Management Document requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 22.3. The Site is located within the borough-wide Air Quality Management Area (AQMA), which covers the Council's administrative area. It is also located partially within the A406 North Circular Edmonton and Fore Street Air Quality Focus Area.
- 22.4. The potential effects of the proposed development have been assessed in Chapter 5 of the Environment Statement and addendum. The Assessment considers the location and impact of the proposals in context of existing uses, streets and infrastructure and examines any risk to occupiers associated with air quality. The scope assesses both the construction and operational impacts of the proposed development. The assessment considers the impact of concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) during the completed development stage. The assessment also considers the potential impact of dust and PM₁₀ emissions in the vicinity of the proposed development during the demolition and construction stage.
- 22.5. The suitability of the site for future residents and users has been considered by predicting future concentrations of Nitrogen Dioxide, Particulate and Fine Particulate matter within the site. The results indicate a negligible change in NO₂, PM₁₀ and PM_{2.5} because of the development. Air quality is generally

expected to improve with time, due to more stringent emissions standards for motor vehicles and the uptake of cleaner vehicles.

- 22.6. Enfield's Environmental Health Officer has reviewed the submitted information. The officer accepts the results and has raised no objection to the proposed scheme, subject to the introduction of appropriate conditions, including on-road mobile machinery and construction management plan (discussed below).

Air Quality - Construction

- 22.7. The demolition and construction works will give rise to a risk of dust impacts during demolition, earthworks and construction, as well as from track out of dust and dirt by vehicles onto the public highway. The overall construction period is assumed to be over a period of approximately 22 years.
- 22.8. The ES identifies measures to mitigate dust emissions required during the demolition and construction works. These include damping down materials, wheel washing and sheeted vehicles. It is proposed to mitigate impacts by securing a Construction Environmental Management Plan (CEMP) via condition which set out best practice.
- 22.9. Taking account of comments by LBE Environmental Health Officer, it is recommended that in addition to CEMPs, conditions relating to Non-Road Mobile Machinery (NRMM) and Construction Logistic Plans are secured for development phases through appropriate planning conditions.
- 22.10. With suitable mitigation in place, the ES concludes that the cumulative effects of demolition and construction should be not significant across the Site. Given the appropriate mitigation there would be no adverse air quality impacts during the construction of the development.

Completed Development – Air Quality

- 22.11. Air pollution has been modelled at the completed development. The predicted effects at this stage are identified as road traffic emissions and emergency generator emissions and some potential from trains. The submitted assessment indicates that the proposed development will not cause any exceedance of the air quality objectives and that the overall air quality effect of the proposed development without mitigation will be not significant, beyond best practice design measures. The assessment of the completed development also demonstrates that the new receptors introduced into the local area through the redevelopment of the Site will experience acceptable air quality.

Conclusion - Air Quality

- 22.12. The Council's Environmental Health Officer does not raise an objection to the proposals, subject to the imposition of relevant conditions. The Environment Assessment concludes that overall, the proposed Development has demonstrated to be acceptable in air quality terms with appropriate mitigation measures in place, secured by condition. Accordingly, the development would be considered in accordance with London Plan Policy SI 1, Core Strategy Policy 32, Policy DMD 65, and Paragraph 186 of the NPPF.

Noise and Vibration

- 22.13. London Plan Policy D14 requires development to avoid significant adverse noise impacts on health and quality of life and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses.
- 22.14. Policy DMD 68 states that developments that generate or would be exposed to an unacceptable level of noise will not be permitted. Developments must be sensitively designed, managed and operated to reduce exposure to noise and noise generation.
- 22.15. Chapter 6 of the Environmental Statement considers the potential effects of noise (and vibration) and the suitability of the Site for the proposed development, along with any direct effects during the construction period.
- 22.16. The following impacts were identified for consideration within the Noise assessment:
- Direct effects of noise and vibration during construction. This is inclusive of construction and demolition activities and construction traffic;
 - Direct effects of plant noise associated with the operation of the Site; and
 - The suitability of the Site for the Proposed Development. Noise associated with the operational stage will be based upon external building services, plant and commercial units/activity.
- 22.17. Noise and vibration reduce over distance and the study area encompasses the Site and the nearest receptors which are considered sensitive to noise and vibration and likely to experience significant effects, inclusive of existing residents within the Site boundary.
- 22.18. The existing baseline environmental sound climate across the Site is typical of an urban location. Noise sources include road traffic, overground trains, commercial vehicles, with road traffic noise from Fore Street dominating the acoustic climate along the eastern boundary. To the west, periodic train movements along the overground line were identified as the primary noise and vibration source. Noise levels reduce towards the centre of the Site but there is an underlying level of road traffic noise from the wider area, including from the North Circular (A406). There are a number of air quality and noise sensitive receptors located in close proximity to the Site including residential properties, shops, religious premises, hospitals and schools.

Noise and vibration - Construction Phases

- 22.19. The construction phases have the potential to have significant noise impact on neighbours if not sufficiently monitored and controlled, and significant effects at several receptors are predicted. These could include excavators, power tools, movement of materials, dozers, cranes, construction traffic and other general site activity. The ES has considered the different stages of the construction programme, to identify the potential for effects at sensitive receptors in close proximity to the works.

- 22.20. The assessment concludes that in respect of effects from demolition and construction activities, typical conditions will result in negligible to minor adverse effects at all receptors and therefore are not considered to be significant. At residential properties immediately adjacent to works (particularly to the site boundary) construction noise may reach levels numerically representative of a moderate to major effect but this will only be temporary in nature. In the context of the proposed mitigation measures when these works are occurring, it is expected that significant effects will be avoided.
- 22.21. The assessment of construction traffic noise indicates that the residual effect is not considered significant. When the proposed levels of trips are compared to baseline traffic data; the uplift represents a 3-6% increase in the total number of HGVs. This is considered a negligible increase, and by association any increase in noise levels because of construction traffic will also be negligible. The assessment reports that contractors will ensure that construction works are carried out in accordance with best practicable means and mitigation measures will ensure that noise and vibration levels are kept as low as practically possible.
- 22.22. The Environmental Health Officer has raised no objection to the proposal in relation to the construction phases. To control the impacts during the construction phases, conditions in relation to noise from fixed plant and equipment and construction noise (to be included in Construction Management Plan) are recommended.

Noise and Vibration - Completed Development

- 22.23. The proposed residential uses are the most sensitive to noise and vibration. In relation to internal residential sound levels, the eastern facades of Blocks C, E and N, which directly overlook Fore Street, and the western facades of Block A, D, T, U, V which directly overlook the railway line, could experience daytime and night-time sound levels which exceed the required levels.
- 22.24. Appropriately designed façade elements, and acoustically rated ventilation and glazing to mitigate impacts are considered acceptable in this location. Furthermore, the use of MVHR with cooling means that the risk of overheating can be minimised with windows closed to help ensure that noise ingress into homes is not unacceptable in amenity terms.
- 22.25. 3D noise modelling has also been undertaken alongside the noise surveys to identify the levels of sound to external amenity spaces, including balconies, roof gardens, and central courtyards for the podium blocks (Blocks D, N, and K within the Detailed Element). Noise in these areas should not normally exceed 50dB LAeq T but an upper guideline of 55 dB LAeq T would be acceptable. Achieving this can be challenging in urban areas and/or sites within close proximity to transport networks. The modelling showed that whilst noise levels would exceed the upper guideline along the boundaries of the Site, including to the west adjacent to the railway line which includes the communal space to the rear of Block D and the private gardens associated with the homes provided as part of Block T, these levels fall towards the centre of the Site and within the podium courtyards they are within acceptable levels. All residents will have access to quieter podium courtyard spaces, which will mitigate the effect of higher sound levels elsewhere.
- 22.26. It is also necessary to consider noise impacts arising from proposed uses within the development. Noise associated with the operation of the Proposed

Development is expected to be limited to external building services plant serving the Proposed Development and activities associated with commercial units. It is considered that noise impacts arising from building services equipment can be dealt with satisfactorily by condition. For the detailed and outline element, within the commercial/retail element, floorspace conditions are recommended and to restrict opening hours. Similarly, for proposed commercial units, suitable conditions should be introduced to control delivery and servicing times and, for all uses are recommended. A detailed assessment will also be undertaken as part of future Reserved Matters applications.

- 22.27. Whilst at the most sensitive locations, noise levels will be higher, the results of the applicants modelling exercise demonstrate that while noise levels along the boundaries of the site can be expected to exceed the upper guideline threshold for external amenity space, noise levels towards the centre of the Site readily fall within desirable levels. On the basis the proposed development is considered acoustically suitable.
- 22.28. The Council's Environmental Health Officer has advised that conditions can be introduced to ensure such measures which will help manage and achieve acceptable levels of noise. Appropriate sound insulation will be required along with relevant insulated glazing both and noise from fixed plan, all of which can be suitably controlled by condition.

Conclusion - Noise and Vibration

- 22.29. The relevant ES chapter demonstrates technical compliance is achieved with regards to relevant planning policies to ensure that future residents will enjoy a satisfactory standard of living accommodation within the dwellings, whilst also safeguarding existing background noise levels through appropriate design and mitigation measures.
- 22.30. No objections have been received from Environmental Health Noise Team. Conditions will be imposed accordingly to ensure that a suitable noise environmental is maintained to neighbouring occupiers during the construction period of the development.

Agent of Change

- 22.31. London Plan Policy D14 states that residential development proposals should manage noise by a range of measures which include reflecting the Agent of Change principle as set out in Policy D13. The Agent of Change principle predominantly concerns the impacts of noise generating uses and activities.
- 22.32. Immediately to the south of the Site is Langehedge Lane Industrial Estate, designated as a Locally Significant Industrial Site. There are 19 industrial units, comprising of different ages and architectural styles. Principally Block L in the outline element (proposed as residential) would adjoin Langehedge Lane Industrial Estate. The relationship between the Site and adjoining site at Langehedge Lane would not fundamentally change as a result of the proposed redevelopment, given both would retain their predominant uses, albeit the application site would densify, resulting in appreciable change in massing and heights of proposed blocks.
- 22.33. The Design Code and Parameter Plans have accounted for the existing industrial uses on Langehedge Lane, whilst aiming to not preclude any

development which may come forward in the future. The internal layouts of the typical floors of Block L have been designed to avoid overlooking from habitable rooms on to the adjacent land to the south beyond the site boundary. By doing so, it is considered the existing uses would not be prejudiced. Habitable rooms would not face onto the Site, mitigating the potential to jeopardise their operation. In addition, this would not stymie development and allows for the future potential redevelopment of the Site, by not introducing unreasonable constraints within the vicinity of the adjoining site.

- 22.34. Policy D13 also considers other nuisances including dust, odour, light and vibrations (see Policy SI 1 Improving air quality and Policy T7 Deliveries, servicing and construction). In relation to the Outline Element, indicative maximum areas for a variety of land uses are shown on the relevant Parameter Plans and set out in the accompanying Development Specification. Although the details associated with these uses is to be set out in future RMAs, it is expected that a consistent strategy for the Outline Element will apply, as used for the Detailed Element. This would involve the submission and agreement of noise management plans and consider local measures such as restrictions on opening hours and outdoor seating and would be subject to conditions.
- 22.35. In addition, non-residential uses which could have the potential to create noise and other impacts have been located a sufficient distance from existing and proposed residential uses and have, where possible, been clustered together, for example, the nursery (Block Q) being located adjacent to the Civic Hub (Block G) containing a variety of community, leisure, and workspace uses. Furthermore, the commercial and retail uses proposed are located along Fore Street, where they are largely re-provision of existing premises along a busy high street and at the base of Blocks O and P where although they will provide a vital active frontage, measures such as those mentioned previously could be incorporated to minimise noise and other impacts.

23. Waste and Recycling

- 23.1. London Plan Policy SI7 calls for development to have adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables and food.
- 23.2. London Borough of Enfield provide guidance on the required bin types/size and storage capacity for communal residential units. The guidance asks for 4 x 1,100L bins (refuse) and 1 x 1,280L bin (recycling) for every 20 units served. Additionally, and following further consultation with the LBE waste strategy team it has been requested that as a minimum a 240L wheeled bin is provided within each bin store to be able to accommodate food waste. Household waste storage has been shown in accordance with the above guidance (as set out in table 4-2) of the Operational Waste Strategy.
- 23.3. Details of refuses have been provided for the detailed commercial and community uses (1x100L bin for Block D and 3x1100L bin for Block N). The quantum of waste and recycling indicated is considered acceptable for non-residential uses.
- 23.4. An Operational Waste Strategy has been submitted which sets out for the detailed element residential waste, recycling and food waste would be collected weekly and adequate storage space and bin/recycling provision has been

provided in accordance with the above guidance. The 4 maisonettes in Block A and 10 houses forming Block T will be serviced by a conventional kerbside collection, as opposed to the communal bins for flatted blocks. All waste stores would be externally accessible and within 10m of the proposed stopping point for the waste collection vehicle.

- 23.5. Storage space for residential and commercial waste for phases 4-10 will be developed at each reserved Matters Application. It is recommended that planning conditions are imposed to reserve the detailed management and maintenance arrangements and secure details for the outline element of proposal. An Operational Waste Strategy and Site Waste Management Plan is recommended to be secured by a planning condition.

24. Contaminated Land

- 24.1 London Plan Policy D11 requires appropriate measures to ensure that development on previously contaminated land does not activate or spread contamination. Local Plan Core Strategy Policies 32 and DMD 66 include similar objectives, requiring all development on land which is or may be affected by contamination to be accompanied by an assessment and effective risk management.
- 24.2 The application is supported by a desktop assessment for the Site. Chapter 10 of the ES provides an assessment of the potential effects of the Proposed Development on ground conditions and the impact of potentially contaminated soil and groundwater on the redevelopment of the Site as well as the effects on ground conditions as a result of the proposed scheme and risks to (future) buildings and structures. The Study considers the historical uses of the Site against the proposed uses. There is evidence of more industrial activity taking place before the Site was developed in the 1950's.
- 24.3 It is reported that there is a moderate/low risk of there being contaminants present including ground-based contamination from various sources due to the former uses of the Site and car parking although it is unlikely that contamination of the water supply will occur.
- 24.4 The Environment Agency has raised no concern in this regard. The desktop study has concluded that a site investigation will be required to establish if there is ground contamination that poses a risk to human health and for this reason, conditions are recommended with regards to remediation/risk management to protect against risks arising from contamination. This is to assess the proposed foundation design with respect to any contamination identified on the Site and set out appropriate design and implementation measures to mitigate the risk.
- 24.5 The Study also identifies that there is a high risk that Unexploded Ordnance (UXO) remains beneath the Site. To minimise this risk, a detailed UXO study and UXO supervision during excavation and intrusive groundworks will form part of the embedded mitigation associated with the Proposed Development and can be secured through a planning condition. A condition relating to disturbance and unexploded ordnance are recommended.
- 24.6 The Environment Agency has raised no objections to the proposed development. The Council's Environmental Health Officer has reviewed the submitted assessment and notes that there is unlikely to be a negative

environmental impact. As such it is recommended that conditions, as recommended be applied in relation to further assessment, remediation measures and verification. Conditions are recommended in relation to unexpected contamination. These conditions are included in the recommendation.

25. Fire Safety

- 25.1. London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 25.2. Proposed changes to the Building Regulations and subsequent publication of the GLA's statement on fire safety were announced in February 2023. This introduced a requirement for residential buildings above 30m in height to be designed and built with two staircases.
- 25.3. In July 2023, the Government announced their intention to require a second staircase for residential buildings above 18m, rather than the 30m threshold previously proposed.
- 25.4. Following the Government's statement in October 2023 reaffirming that a second staircase would be needed for residential buildings above 18m, Blocks A, D, N and K in the detailed element (where the building/or parts of the building exceed 18m) have been revised to incorporate second staircases and balance the associated implications on floorplates and elevations. The requirement for second staircases have already been factored into the outline blocks (B, F, O and P, which are over 30m) and a second stair will be accommodated in all buildings over 18m in the outline element.
- 25.5. This application is submitted with a Fire Safety Statement (April 2024) in support of the application. The Statement details a range of measures including means of escape inclusive of those with reduced mobility, means of warning and details surrounding fire spread control. Access facilities for the fire service and fire safety management and maintenance details are outlined.
- 25.6. A Fire Safety Qualitative Design Review (QDR) has been carried out and accompanies this application. It relates to Block D within the Detailed Element, given the height of core D2 of this building which is over 50m. The QDR does not consider Blocks A, N, K, or T given that the height of these buildings will be less than 50m. It considers fire risk in greater detail alongside the Fire Statement through further consideration of fire hazards and occupancy. It has concluded that the level of risk from fire for Block D is anticipated to remain at least equivalent to residential buildings of a height lower than 50m.
- 25.7. The Health and Safety Executive issued a response in relation to the fire statement dated April 2024. HSE welcomes the provision of a second stair within all residential buildings above 18m and is satisfied with the fire safety design. It is noted the fire statement was helpfully detailed and informative. The London Fire Brigade is a non-statutory consultee. The London Fire Brigade were consulted on this application however did not comment.

- 25.8. A condition requiring the submission of a fire statement with each reserved matters application for the outline scheme has been included (as recommended by HSE) and it is recommended that a planning condition require compliance with the submitted Fire Strategy for the detailed phases in accordance with London Plan Policy D12.

26 Flood Risk and Drainage

- 26.1. London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.
- 26.2. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for major development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage Strategies and maximising the use of Sustainable Urban Drainage Systems (SuDS).
- 26.3. The site is in Flood Zone 1 and is subject to small areas of localised surface water flood risk, which can be addressed through the SuDS Strategy. Blocks O and P are the only blocks with allowances for a single-story basement. Following ground investigation, it is considered that the proposal for a basement in Block O and P may impact perched groundwater flooding locally. A detailed Groundwater FRA Technical Note is therefore required as part of Reserve Matters Application for any phase involving a basement or lower ground floor level, including further groundwater investigations outlined in the condition.
- 26.4. The proposed development overhauls the existing site plan and landscape arrangement. The proposed source control SuDS measures include green roofs, rain gardens and permeable paving and it is recommended the details are secured by condition.
- 26.5. The SuDS Strategy should seek to optimise below ground storage features by maximising above ground storage in ponds, swales and basins. These features can be multifunctional and should be incorporated in the landscape. It is recommended these measures are secured by conditions. Given the above the LLFA have raised no objections to the development and the proposal is acceptable in this regard.

Water Infrastructure

- 26.6. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request conditions be added to any planning permission requiring water network upgrades to accommodate the additional demand to serve the development are completed; or - a development and infrastructure phasing plan is agreed with Thames Water to allow development to be occupied. These conditions have been recommended.

- 26.7. In order to ensure compliance with London Plan Policy SI5, it is recommended to use a planning condition to minimise the use of mains water in line with the Operational Requirement of the Building Regulations (residential development) to achieve mains water consumption of 105 litres or less per head per day.

27. Basement Development

- 27.1 Policy DM18 relates to new Basement development and sets out that the construction of new basements, including in existing dwellings will only be permitted subject to certain criteria.
- 27.2 Basements are proposed in Blocks O and P (ancillary to C3 use), which equates to one floor below ground level with a maximum floor area of 1,606sqm in the outline element. It is recommended that a planning condition is imposed to secure a detailed basement impact assessment prior to the commencement of development on blocks O and P. Any impacts in terms of groundwater are suitably controlled by condition, set out above.

28. Socioeconomics and Health

Jobs and Employment

- 28.1. London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-use phases.
- 28.2. Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 28.3. There are an existing 130 jobs supported at the existing site. This would rise to approximately 167 jobs. There would be economic benefits, including jobs during construction and in the operational phase of the development including spend from future residents. To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that the Shadow S106 agreement secures employment and skills obligations in accordance with the S106 SPD.

Education

- 28.4. London Plan Policy S3 seek to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand. Local Plan Core Policy 8 supports and encourages provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. The proposed development is expected to accommodate approximately 1,010 persons to be 19 or under.
- 28.5. The application proposed a 250sqm nursery / early years education space within Block Q within Phase 4. Based on the most recent data provided by LBE for nurseries, early years providers (including primary schools with nursery classes)

are operating at a deficit of 51 places in the vicinity of the site (500m-1km). This suggests that currently early years provision in the local area is constrained.

- 28.6. It is anticipated there are likely to be the need for 74 nursery places. The development is expected to mitigate the impacts that result from additional early years provision. A new nursery is proposed to be provided in Block Q and, to accommodate an additional 78 spaces. The nursery onsite, is therefore expected to cover the additional demand created by the Proposed Development. There is a small period where additional demand created by the Proposed Development is likely to exceed capacity – 2035 to 2037, while construction of the nursery is still ongoing – in the long run the nursery onsite will mitigate the additional demand.
- 28.7. The nursery provision onsite would be provided at a time when there is expected to be a population uplift, based on the phasing of the development and would overall, exceed the additional demand for places created by the Proposed Development when completed. The recommended condition requires completion of Block Q prior to occupation of any residential units in Phase 4 to mitigate the identified impacts.
- 28.8. In relation to primary schools where catchments overlap with the site boundary the future baseline anticipates that there will be at least 1,875 spare places. Approximately 215 new children between 5 and 10 could require education in the area. Approximately 174 new residents aged between 11 and 16 may require secondary school places. The ES shows there is to be an expected 1,108 spare secondary school places in 2045.
- 28.9. The phased nature of the Proposed Development and the impact of child yield in the initial Phases 0 to 3 (Detailed element) based on the assessment in the ES would have a minimal impact on local schools. Primary and Secondary school place contributions will be considered as part of an education review, secured in the shadow s106, as part of the first RMA (for Phase 4). The purpose of this is to review demand for spaces against local capacity, and then secure the S106 SPD contribution sum (£2,535) for each place needed as identified through the review.
- 28.10. Furthermore, the number of children requiring special education needs and disabilities (SEND) provision as a part of the proposed development is estimated at 22 given the uplift in number of homes on the Site. Using the formula agreed with the Education team, the SEND contribution, is £223,080. This will be paid in one capital instalment, at the point of population uplift, to allow education the spend to bring forward SEND provision and is given weight in the assessment.

Health Impact

- 28.11. London Plan Policy GC3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to an outlined criterion.
- 28.12. London Healthy Urban Development Unit (HUDU) have engaged with the consultants Volterra and the applicant prior to the submission of the planning application. This has included comments provided on the EIA scoping report in November 2021. Volterra has provided information on the existing and proposed housing mix, which has allowed the HUDU to run the Planning Contributions Model to calculate the net population yield and estimate the s106 contribution

needed to mitigate the impact on healthcare. Volterra have clarified that the development includes up to 471 decanted units which will allow existing households to stay on the estate. All secure tenants and resident homeowners will be given the 'right to remain' on the estate, should they wish to do so, although, it is expected that the remaining 324 households/units will relocate elsewhere either through choice or through compulsory purchase (e.g. the non-resident homeowners). Although all 587 secure tenancy households and resident homeowners can be accommodated in the proposed development should all those households wish to remain on the estate.

- 28.13. The Environment Statement (Chapter 13 Socioeconomics) and the Health Impact Assessment concludes that the proposed development will have an impact on healthcare which will be mitigated by a s106 financial contribution to expand existing healthcare infrastructure in the area. There is a recognition based on discussions with the NHS and their representation, that the preference for mitigation is through expansion of capacity off site. This is confirmed in the Environmental Statement of the non- technical summary proposing mitigation as "Specific offsite financial contributions secured through s.106".
- 28.14. The response from HUDU confirms funding would be best directed towards a separate health centre or potentially investment to be directed towards existing premises. New residents will require access to primary, community and secondary healthcare services. The use of the NHS HUDU Planning Contributions Model is the methodology set out in the London Plan 2021 (Chapter 11). HUDU and the ICB have calculated a s106 contribution needed to mitigate the impact of the development on healthcare.
- 28.15. The Model figures assumes figures based on the remaining residents and the new residents which will move into the area and that 471 units will be occupied by existing tenants and also that a significant proportion of residents will move within the area.
- 28.16. As set out the HUDU has advised the intention is to expand existing health facilities - expanding existing facilities can improve sustainability and affordability for the NHS. Mitigation will include a mix of extensions to existing buildings and reconfiguration, at a lower cost than new development. HUDU have set out healthcare facilities within a radius of 1.6km within which would expect capacity to be expanded. The North Central London Integrated Care Board is working with its network of GPs to develop estate strategies which reflect changing clinical strategies, the Fuller Stocktake report focusing on neighbourhoods and the wider shift to moving care close to home. The North Middlesex Hospital is close by and has plans to expand capacity and services, which is referenced in the application.
- 28.17. Taking this approach, HUDU have requested a capital cost of £2,719,401. The shadow s106 seeks to secure this amount at the point of population uplift on the estate (Phase 5). The agreement to pay the capital cost, in a single instalment is considered of significant weight. The timing of the contribution will allow the NHS to deliver the capacity alongside the arrival of the new population. This will enable expansion of the capacity of health infrastructure within the vicinity of the Site.
- 28.18. HUDU also welcome the applicant's commitment to monitor health impacts in the Health Impact Assessment. This will include construction and operational impacts arising from phases of development. In addition, the use of post-occupancy surveys which could identify the demographic profile of new

residents and their changing health and care needs over time as well wider health and wellbeing impacts and requirements are welcomed, and it is recommended these are also secured through the Shadow S106 agreement.

29. Wind and Microclimate

- 29.1 London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind are taken into account to encourage people to spend time in a place. London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate.
- 29.2 The wind microclimate assessment, submitted as part of the ES and the Pedestrian Level Wind Microclimate Assessment, considers the potential wind effects with respect to pedestrian comfort and safety during demolition and construction of the development and after its completion. The assessment follows the Lawson Criteria.
- 29.3 Minor adverse impacts were found to the uppermost central balcony on Block A and rooftop level seating to K and N in the detailed element. With the inclusion of wind mitigation measures, notably screening, hedging and tree planting there would be a negligible impact. It is recommended these mitigation measures are secured by condition.

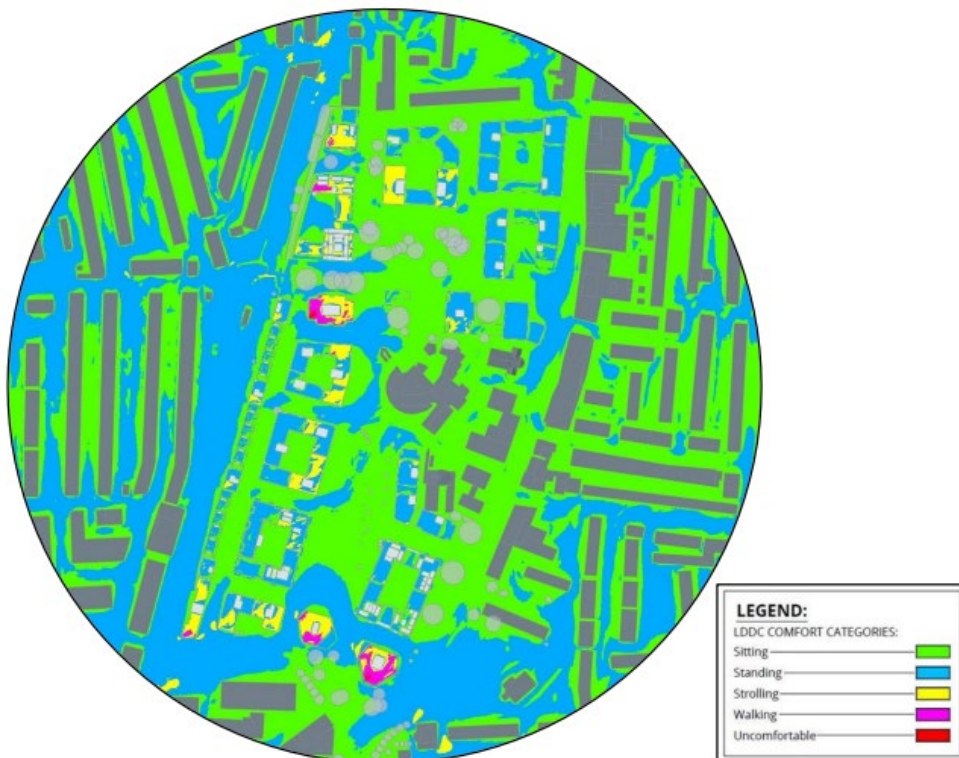


Image: Proposed Development (detailed scheme) + outline scheme) with the existing surrounding buildings and existing landscaping; - Ground Level (Annual)

**without mitigation*

- 29.4 There would be areas around and on the outline Blocks, notably F, P and O with unsuitable wind conditions and expected strong wind exceedances ('uncomfortable' in exceedance of 10m/s). These will be tested at the detailed RMA stage to ensure all locations would have suitable wind condition for the intended use.
- 29.5 It is therefore recommended conditions are attached to the permission to ensure that appropriate additional microclimate assessment work takes place and suitable mitigation is delivered as part of the scheme for the outline phases. Subject to this, officers consider that the proposed scheme would result in an acceptable wind environment.

30. Security and Safety

- 30.1. London Plan policy (D11 Safety, security and resilience to emergency) Part C states that development should include measures to design out crime. The policy states that these measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
- 30.2. The applicant engaged in discussions with the Design out Crime Officer at the application stage and these discussions have informed the design. The Design out Crime Officer has been consulted on the application and has confirmed a condition to achieve Secure by Design accreditation. A condition is recommended to ensure that details of security measures are submitted for approval and that Secure by Design accreditation is achieved prior to the occupation of the development.
- 30.3. Furthermore, the masterplan layout carefully balances the placement of blocks, consolidated green space, into a cohesive layout that knits into the surrounding urban fabric. A street-based approach with perimeter blocks creates a legible proposal with a strong public front and secure private amenity and is considered to create a safer environment.

31. Equality Statement

- 29.1 London Plan Policy GG1 of the London Plan highlights the diverse nature of London's population and underscores the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities.
- 29.2 Due regard has been given to the Public Sector Equality Duty contained in section 149 of the Equality Act 2010, which sets out the need to eliminate unlawful discrimination, harassment and victimisation and to advance equality and opportunity and foster good relations between people who share protected characteristics and people who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 29.3 The Council should have had due regard to the impact on the residents with protected characteristics. The Public Sector Equality Duty contained in the

Equality Act is not a duty to eliminate discrimination but requires that where there is a negative, consideration be given to clear negative impacts and the extent to which they can be mitigated.

- 29.4 An Equalities Impact Assessment (Volterra) has been submitted in support of the application. The proposals follow the principles set out in the London Plan and the Mayor's Good Practice Guide to Estate Regeneration would be met in terms of the right to remain, a fair deal for leaseholders and public consultation and engagement. One of the key aims of the regeneration proposals is to ensure that residents are able to remain on the estate throughout the construction of the scheme. The phasing and decant strategy will ensure this, with a single move offered to existing residents.
- 29.5 The proposal will support the delivery of a range of socio-economic and regeneration outcomes, with potential positive impacts on residents with protected characteristics arising from the provision of new homes, a net gain of homes in the area, including at social rent, an increase in the number of family homes that will assist in reducing overcrowding.
- 29.6 The proposed new residential accommodation meets inclusive design standards and 10% of the new homes will be wheelchair accessible. The proposal will also provide blue badge spaces which will be allocated based according to need. The development will also secure cycle parking in accordance with the London Design Cycling Standards to enable cycle parking for different user groups i.e., wider cycle parking spaces to accommodate non-standard sized cycles.
- 29.7 The phasing allows for a Commercial Relocation Strategy. This seeks to support local businesses and reduce the overall impact of regeneration on local businesses and includes relocating businesses within the application site within Block N where space is available, and the use is compatible with the regeneration proposals. The makerspace within Angel Yard will be relocated within Block C and E with reduced rent rates. These mitigation measures to existing commercial users will serve to limit any impacts and ensure businesses, organisations and employees are supported through the process.
- 29.8 With the mitigation, the equality impact reduces from substantial adverse effect to a minor adverse impact on the general population as well as the priority groups. The appropriate level of consultation with the public and Council consultees has been carried out. The Applicant has also carried out engagement with nearby residents and occupiers prior to the submission of the planning application. Overall, the proposed development would not result in adverse impacts upon equality or social cohesion.

32. Shadow S106 Heads of Terms

- 32.1. The NPPF requires that planning obligations must be:
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and,
 - (c) Fairly and reasonably related in scale and kind to the development.
- 32.2. Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting

planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.

- 32.3. The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. The Council's Infrastructure Funding Statement (2019/2020) sets out planned expenditure over the current reporting period (2020/21).
- 32.4. In setting out financial contributions to be secured through a S106 Agreement, the applicant has prioritised the delivery of affordable housing across the proposed development. As a consequence, it is stated that without compromising the viability of the applicant being in a position to bring forward the proposed development, the applicant is not in a position to address all identified requirements of the adopted Enfield S106 Supplementary Planning Document (SPD). The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within a S106 Agreement:

Affordable Housing

- Accommodation schedule in line with number, mix and tenure of affordable homes in detailed phases
- Provision of Affordable Housing in accordance with affordable housing tenure split for detailed phases
- Phasing and minimum replacement social rent provision Affordable housing delivery strategy for outline phases (4-10)
- Provision of minimum 19% percent of family sized homes
- Number and tenure split outline phases
- Enfield Nomination rights
- Phased decant and re-provision requirements for Phases 0-5 (the decant Phases)
- No net loss of affordable floorspace/hab rooms per phase
- Minimum baseline affordable housing provision across the entire site
 - 53% of the total housing proposed by habitable room (49% by unit)
 - social rent accommodation to equate to 62% of the overall gross affordable housing by unit
- Minimum provision of family housing

Housing tenure and affordability

- Social rent housing at no more than target social rent
- Intermediate shared ownership eligibility - households on incomes below £90,000 and with requirement for the shared ownership homes to be marketed to households on the following income bands for 3 months before cascading to the London-wide £90,000 maximum income level if unsold:
 - these lower income levels:
 - one-bedroom homes: £40,000;
 - two-bedroom homes: £40,000; and
 - three-bedroom home: £60,000.
- Eligibility requirements for the shared equity units are in line with the London Plan maximum income threshold (maximum £90,000). Shared

Equity Homes to meet the Shared Ownership requirements in that they should be restricted to households on incomes of income below £90,000.

- Overall housing costs, including service charges do not exceed 40% of the maximum household income. In line with the London Plan, a range of income levels should be provided for below the maximum £90,000. In the event the shared equity homes are not taken up then these homes should flip to intermediate shared ownership.
- All intermediate housing costs (including rent, mortgage, service charge) to not exceed 40% net household income.

Viability Review Mechanisms

- An updated viability appraisal with actual costs and values replacing estimated values as the scheme progresses, subject to inputs being fixed:
 - Benchmark Land Value (based on EUV)
 - Target return
- Early-Stage Viability Review Mechanism
- Mid-Stage Viability Review Mechanisms – there should be at least three Mid-Stage reviews. To be on each RMA or at fixed points in the delivery programme
- Late-Stage Viability Review Mechanism
- The review policy caps should be set at 50% of the net additional units being provided as affordable housing (plus the re-provision of the existing affordable homes)
- Submission and approval of an Additional Affordable housing scheme (should viability review mechanisms show a surplus in value and potential for additional affordable)
- Increase to affordable housing minimum in the case of any surplus identified on early and mid-stage reviews, with a financial contribution calculated where there is a surplus on late review

Phasing

- Occupation of market housing restricted to ensure minimum baseline level of affordable housing maintained throughout the development.
- Submission of Approved Affordable Housing Scheme prior to the implementation of each Reserved Matters Application

Workspace

- At least 10% of the proposed workspace at a 25% reduction to prevailing market rates and on flexible terms for 15 years from first occupation of each unit
- Workspace Management Plan
- Strategy to assist with the relocation of existing business within the development to permanent locations within the development, to be submitted with relevant Reserved Matters Application

Social Infrastructure

- Re-provision of existing social infrastructure floorspace on site - Fore Street Living Room Library in the new Civic hub prior to demolition of existing facility

- Civic Hub Business Plan
- Submission and approval of details relating to the new community/ civic use facility in terms of agreeing specification / shell and core
- Completion of the new community/ civic use prior to occupation of residential homes on the latter (next) residential phase
- On site facility at peppercorn rent for use as Police Accommodation. Fit out the Police Accommodation
- Use of 2 parking spaces for emergency vehicle use
- Community access to MUGA as Part of Phase 4

Nursey

- Provision of nursery to accommodate demand in uplift in homes (in Phase 4).

Health

- £2,719,401 contribution for the provision of expanded health services within the vicinity of the development at the point of population uplift

Public Open Space and Play Provision

- Delivery of Open Space and Access Management for open spaces
- Unrestricted public access to public realm, subject to normal justified exceptions
- £500,000 improvements to Florence Hayes
- Estate Management and maintenance plans
- Delivery of public space in terms of quantum linked to occupation of market homes in a certain phase
 - The Meadows (min. size).
 - The Northern Grove public park (min. size)
 - The community / civic square on Fore Street
 - The school square
- Community access for MUGA and management plan for operation and use

Biodiversity

- 56,068 for SAMMS - £45.40 per unit applied to uplift in homes
- £450,000 contribution for Suitable Alternative Natural Green Space (SANG) – Improvements to a) Pymmes Brook Trail and b) Pymmes Park.

Design

- Architect retention scheme
- Design monitoring costs (detailed)
- Design monitoring costs (outline)
- Design Review (outline phases)

Railway Pedestrian footbridge

- Delivery of pedestrian/cycle footbridge linked to the occupation of adjacent blocks

Education

- £223,080 - education per dwelling (£2,535) and multiplied by 4 (£10,140) on the basis of SEND at the point of population uplift
- To review Primary and Secondary school place contributions as part of Education review - £2,535 for each place needed as identified through the review at the point of net new units.

Employment and Skills

- An Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, reporting and associated targets. – propose 1 apprenticeship for every £3million spend on the build
- Request 25% local labour and a minimum of 10% local spend on materials.
- Scope to work with the developer to discuss employer events, school engagement and other interventions further down the line

Energy

- £153,457 Carbon Offsetting contribution for Phases 0-4.
- Connection to District Energy Network. Measures to ensure connection to a district energy network to supply low carbon heat.
- Carbon offsetting for Reserved Matters Phases at £95 a tonne x 30 years
- Monitoring ('Been Seen') GLA Monitoring Portal.

Heritage

- £500,000 financial contribution to Heritage Enhancement Fund and public realm improvements
- Preparation of Fore Street Public Realm Strategy (including heritage interpretation)
- Relocation of Gilpins Bell sculpture

Transport

- £389,359 contribution for singlaised crossing over Sterling Way
- CPZ consultation contribution at commencement
- CPZ implementation contribution at conclusion of consultation
- Travel Plans (residential & non-residential)
- Travel Plan monitoring
- Parking permit restrictions
- Sustainable Transport Contributions (Phases 0-3)
- Sustainable Transport Contributions (Phases 4-10)
- Highway works (phases 0-3) including College Close/ Sterling Way Junction, College Gardens, Snells Park, Langehedge Land and Langhedge Close
- Highway works (phases 4-10)

Other

- LBE Management fee (maximum 5% of value of financial contributions and £350 per non-financial obligation).

- Payment of legal costs
- Index linked contributions.

32.5 This is an application by the Council and the Council is the determining local planning authority on the application. However, it is not possible legally to bind the applicant via a S106 legal agreement. It has therefore been agreed that as an alternative to this a Memorandum of understanding between the proper officer representing the applicant and the proper officer as the Local Planning Authority will be agreed subject to any approval.

33. Community Infrastructure Levy (CIL)

- 33.1. Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 33.2. Enfield adopted their local CIL Charging Schedule in April 2016. The site falls within the 'Lower Rate Eastern Zone' for Community Infrastructure Levy Residential Zones. As such, for Class C3 residential uses, CIL is charged at £40 per square metre. For retail, financial and professional services including betting shops, restaurants and cafes, drinking establishments and hot food takeaways CIL is charged at £60 per sqm across the borough. All other uses (including offices, industrial, hotels, leisure facilities, community and other uses) have a CIL liability of £0 per square metre.
- 33.3. In the London Borough of Enfield the Mayoral CIL rate is £60, plus indexation, per sqm of net additional floorspace for all development other than developed used wholly or mainly for health and education.
- 33.4. Credits for demolition and social housing relief can be used to reduce the amount of CIL payable.
- 33.5. In line with the applicant's CIL liability form, in the estimated Detailed Phases amount of MCIL owed is approximately £13,300.36. The amount of Enfield CIL owed is £38,523.33.

34. Conclusion and Planning Balance

- 34.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning applications must be determined in accordance the development plan, unless material considerations indicate otherwise.
- 34.2. The Council has committed to an ambitious house building programme to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This is captured in the Council's 2020-2030 Housing and Growth Strategy.
- 34.3. The scheme will enhance the social infrastructure in the area through the provision of community facilities and S106 contributions towards healthcare and education. It will provide new civic hub, nurse and community space. It is considered that most of these obligations would be necessary requirements for any development of a similar nature and therefore these benefits are only afforded a moderate weight.

- 34.4. The proposals would provide new / modern employment space and increased employment, at discounted rates helping to achieve the aims of the development plan policies. The renewal of the high street will introduce modern retail units with services reflecting the diverse needs of the community and will contribute substantially to the overall health, vitality and viability of Fore Street and the wider Angel Edmonton District Centre.
- 34.5. The residential-led development would provide 2,028 new residential units making a significant contribution to the Borough's housing target. 1,013 (53%) of the homes will be affordable (based on hab. rooms), exceeding the London Plan requirement of 50%, including, 625 homes (62% by unit) being provided at much needed Social Rent. Furthermore, the Detailed Phases will deliver 575 new units, 91% of which are affordable and 58 wheelchair adaptable units. The Council cannot currently demonstrate a five-year housing land supply (the 'tilted balance'). Given the Borough's high housing target and the identified need for rented affordable housing, the overall housing package is afforded significant weight.
- 34.6. An appraisal of the scheme has been carried out by an Independent Viability Assessor for the Council. Whilst the scheme benefits from grant, the appraisal concludes that the scheme produces a deficit. Despite this, the scheme exceeds the policy requirement of affordable housing and has agreed to early, mid and late-stage review mechanisms to be included in the s106 as well as other financial mitigation and infrastructure. It is considered that the amount of affordable housing on the Site has been maximised and therefore accords with Development Plan in this regard.
- 34.7. The proposed site layout would provide new public parks and civic square amongst other public realm, vehicular/cycle/ pedestrian connections to Fore Street and safeguarding and improving potential east-west links over the rail line. Proposed transport improvements for the area, include a pedestrian crossing to the A406, pedestrian bridge over the railway line and improved connections to Fore Street. Contributions towards which, would be secured through S106 contributions and infrastructure levy.
- 34.8. The heights of some of the proposed buildings exceed the maximum recommended height for this Site set in the DMD and Draft Local Plan. Whilst the heights of the proposed buildings exceed the heights indicated it is considered that the proposed massing within these plots presents an acceptable design solution which responds to the constraints of the Site. The departures are also considered necessary to make efficient use of the Site and secure the delivery of a range of public benefits.
- 34.9. The likely functional and environmental impacts of the proposed tall buildings are considered acceptable. The submitted parameters and design code will facilitate the delivery of tall buildings of sufficiently high-quality to justify their proposed height and form and their likely effects on surrounding townscape. For the detailed Blocks, the architectural detailing, proposed materials, and landscaping will contribute to a high standard of design quality. The scheme meets the assessment criteria for tall buildings set out in London Plan policy D9. For these reasons, it is considered that the proposed buildings are acceptable in urban design terms and that building heights in excess of those recommended can be supported on this instance.

- 34.10. The proposals would cause very high adverse harm to the Joyce and Snells Estate through its loss and redevelopment. Having regard for the scale of harm and the significance of this NDHA, moderate weight is given to this harm. Harm has also been identified from the proposals resulting in less than substantial harm to the significance of a number of designated. National guidance requires great weight to be applied to the preservation of heritage assets. Even though the impact on the heritage assets must be afforded significant weight under the NPPF, it is considered that the significant benefits of the contribution towards housing, affordable housing, employment and public transport would outweigh this harm. Overall, the identified public benefits of the scheme are considered to outweigh the less than substantial harm to the character and appearance of the adjoining conservation areas. These benefits are also considered to outweigh the less than substantial harm to the Grade II listed and non-designated heritage assets (locally listed buildings). Having regard to Section 16 of the NPPF the harm identified is considered to be outweighed significantly and demonstrably by the public benefits. The scheme would therefore accord with Paragraph 11d of the NPPF.
- 34.11. The proposed homes would be high-quality and future residents are anticipated to enjoy an acceptable level of amenity (in terms of aspect, size of homes, open space, play space, outlook/privacy, daylight and sunlight, noise, wind conditions, air quality and overheating). There are instances where internal daylight and sunlight standards are not achieved, however a degree of flexibility is required in considering a regeneration scheme of this nature and the need to optimise the site's capacity. The private and shared amenity spaces are considered to provide a good level of external amenity space and play space will be in accordance with the required standards. Overall, the development will provide a satisfactory residential environment for future residents.
- 34.12. The scheme will significantly improve existing areas of public open space on site and off site whilst providing a net uplift. The new areas of public open space would create high quality spaces that will be accessible by members of the community. There are a number of mature trees on site which are to be retained. In addition, new trees would represent an uplift in tree cover and when considered alongside the ecological planting would represent a significant enhancement in biodiversity value across the site.
- 34.13. The proposal will result in a degree of harm to the residential amenities of properties by reason of loss of daylight and sunlight. The overall level of transgression is not considered proportionately high although in some instances is severe. The assessment has been made on maximum parameters and it is expected this harm can be further mitigated. Whilst some inevitable loss/harm would be expected due to the underutilised nature of parts of the site the level of harm is acknowledged and weighed in the overall balance of the proposal.
- 34.14. The proposals will achieve an acceptable performance against the London Plan and Core Strategy policies on Energy and Sustainability. A new energy centre is proposed, and the development would connect to the DEN. Flood risk is low and likely environmental impacts, including noise, air quality, wind and microclimate, waste and recycling and land contamination, basement impact and archaeology could be made acceptable by use of planning conditions.
- 34.15. Officers have taken full account of the findings of the submitted Environmental Statement and into account the responses to consultation and other relevant information in accordance with EIA Regulations, and other relevant legislation

and guidance. The findings of the ES are referred to, where relevant, throughout the report. If planning permission were to be granted, satisfactory mitigation measures identified in this report, could be secured by planning conditions and/or through the Shadow s106 planning obligations.

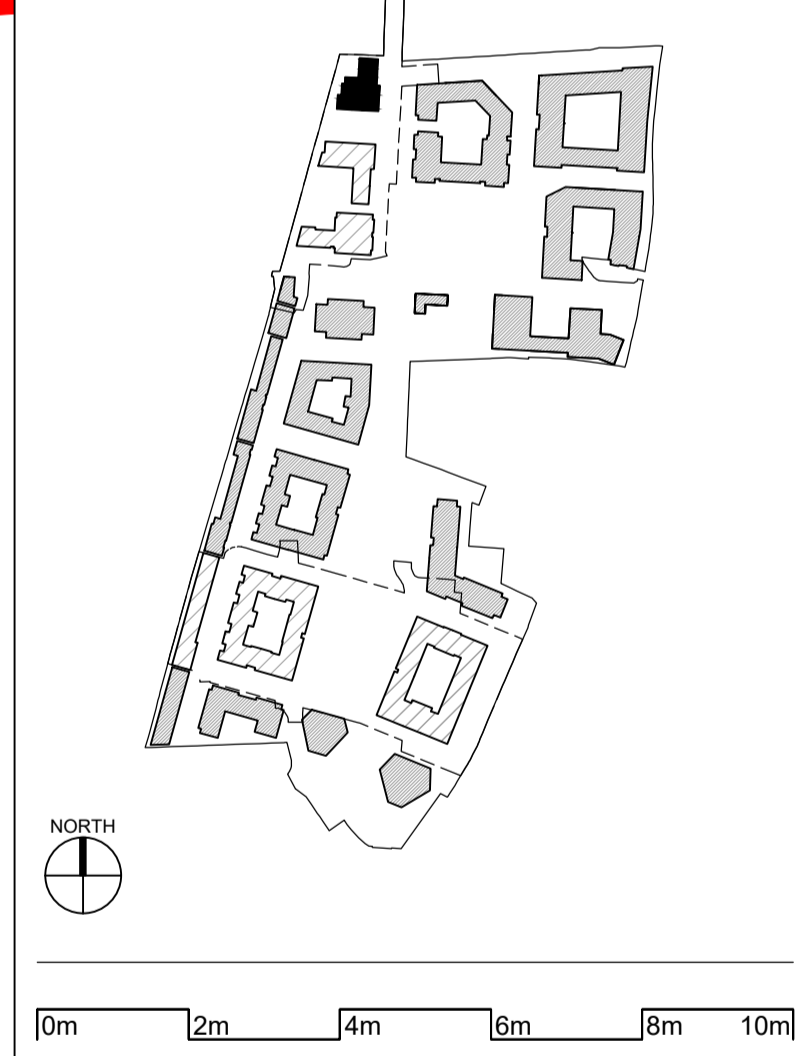
- 34.16. The proposed scheme would provide an accessible and safe environment and significant additional affordable homes. Subject to securing the delivery of various features and provisions identified in this report, the proposed scheme would have a positive equalities impact.
- 34.17. Overall, the principle of the development of the site, in terms of the uses proposed is in accordance with the relevant Development Plan Policies as well as other material considerations. The scheme will secure the delivery of a range of public benefits including the provision of additional homes (including affordable, accessible, and family housing), provision of significant public realm enhancements, provision of a new civic square, provision of a new public park, provision of new and enhanced pedestrian and cycle connections across the site, biodiversity enhancements and the provision of energy efficient homes.
- 34.18. Taking the above considerations into account, the proposals are in substantial accordance with the development plan policies, national and other guidance and the application is recommended for approval, subject to conditions and the shadow s106.

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- LEGEND**
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 - - - Extent of Development for Detailed Application
 - Proposed FFL
 - DR1** Dry Riser Inlet
 - DR** Dry Riser
 - WRI** Wet Riser Inlet
 - WR** Wet Riser
 - ELSSR** Electrical Life Safety Switch Room
 - EISR** Electrical Intake/Switch Room
 - EL** Evacuation Lift
 - FFL** Firefighting Lift
 - Main Entrance
 - Secondary Entrance
 - Home Entrance

- KEY PLAN**
- Block Location
 - Detailed Blocks
 - Outline Blocks



PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status

PLANNING ISSUE

client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration

drawing title
Block A - Level 00
 Proposed General Arrangement Plans

drawing number
 ENF-JSE-HTA-A-BA-DR-PL-0100

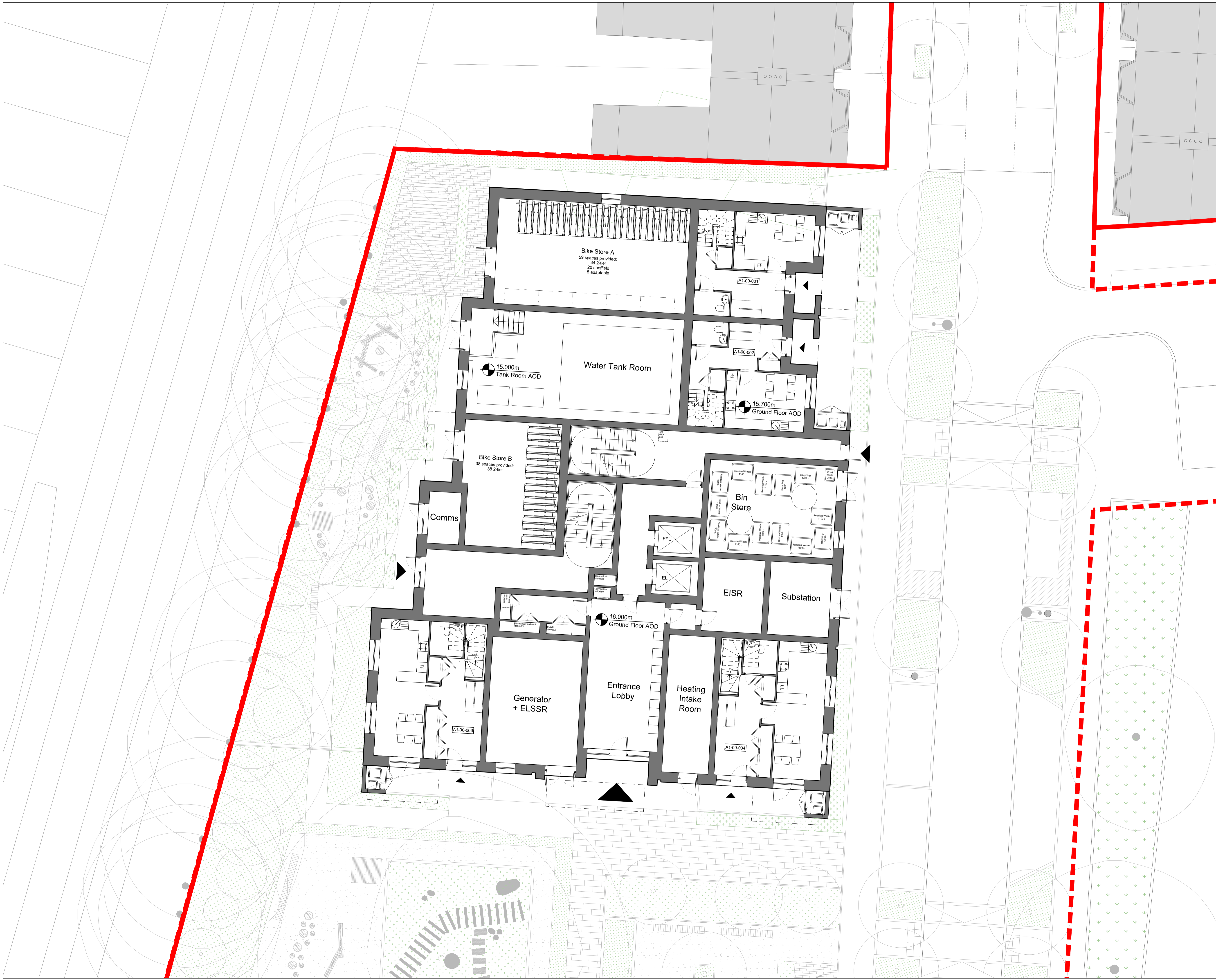
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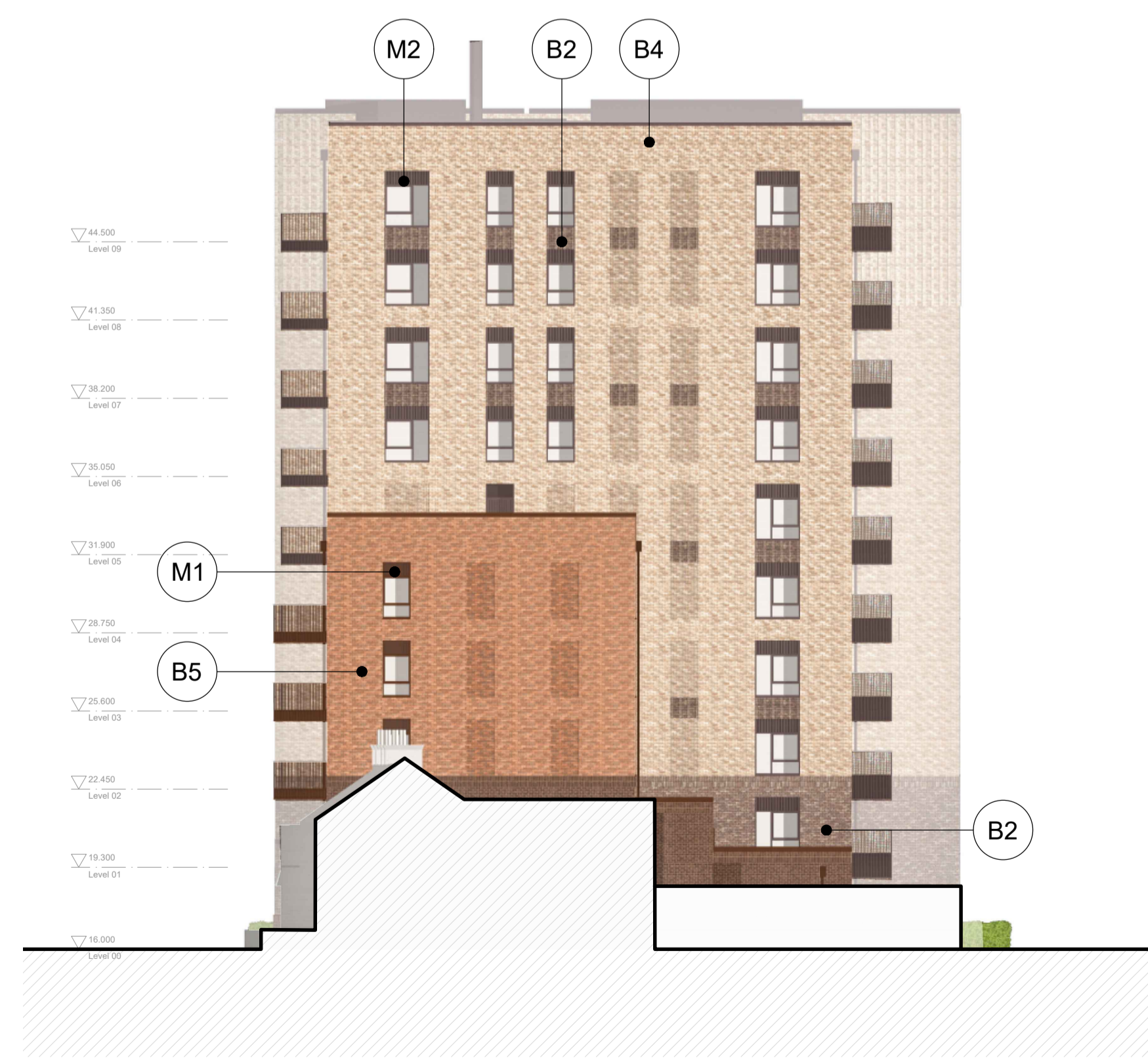
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2 South Elevation
1 : 200



3 West Elevation
1 : 200



4 North Elevation
1 : 200

LEGEND

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B2 Brown	M2 Grey
B3 Dark Brown	M3 Light Grey
B4 Buff	M4 Red
B5 Red/Brown	
B6 Light Grey	
B7 Light Red	

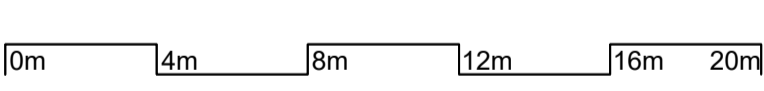
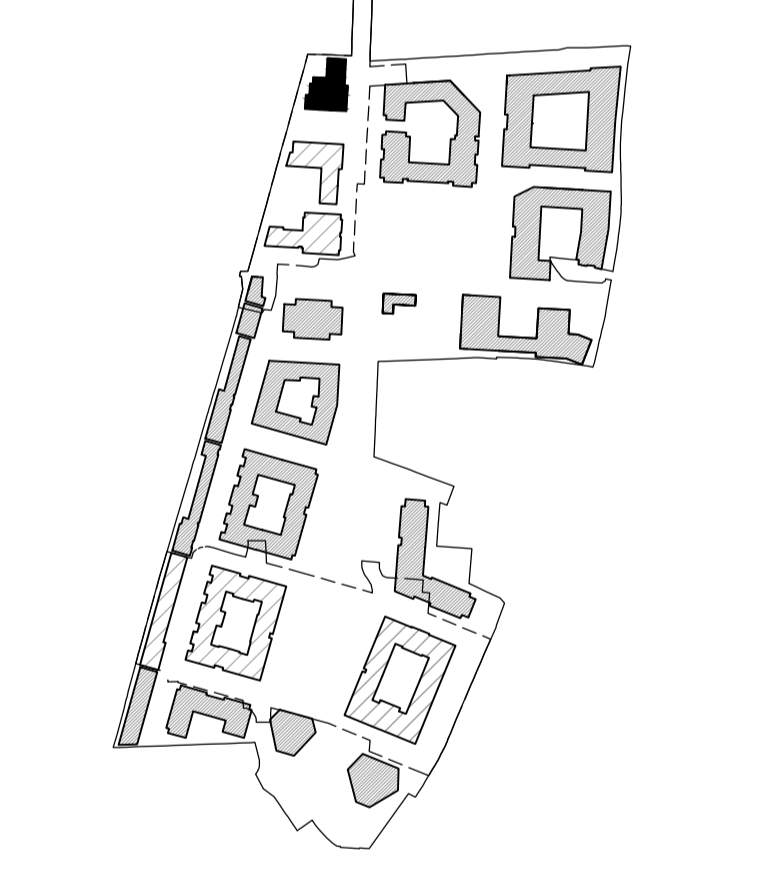
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S2 Red/Brown	▶ Secondary Entrance
S3 Buff	▶ Home Entrance
S4 Red	
S5 Light Red	

BLOCK KEY PLAN



ESTATE KEY PLAN

█ Block Location
▨ Detailed Blocks
▫ Outline Blocks



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 Rev Date Drawn Description
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PLANNING ISSUE
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 Joyce & Snell's Estate Regeneration

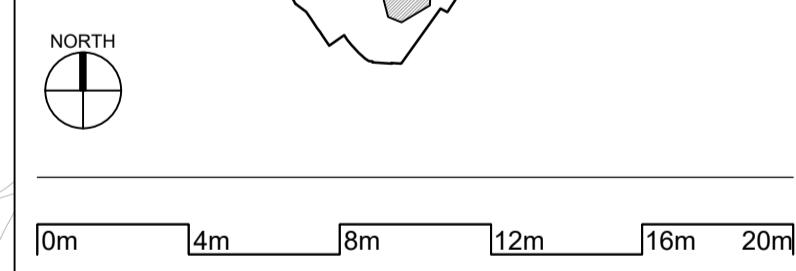
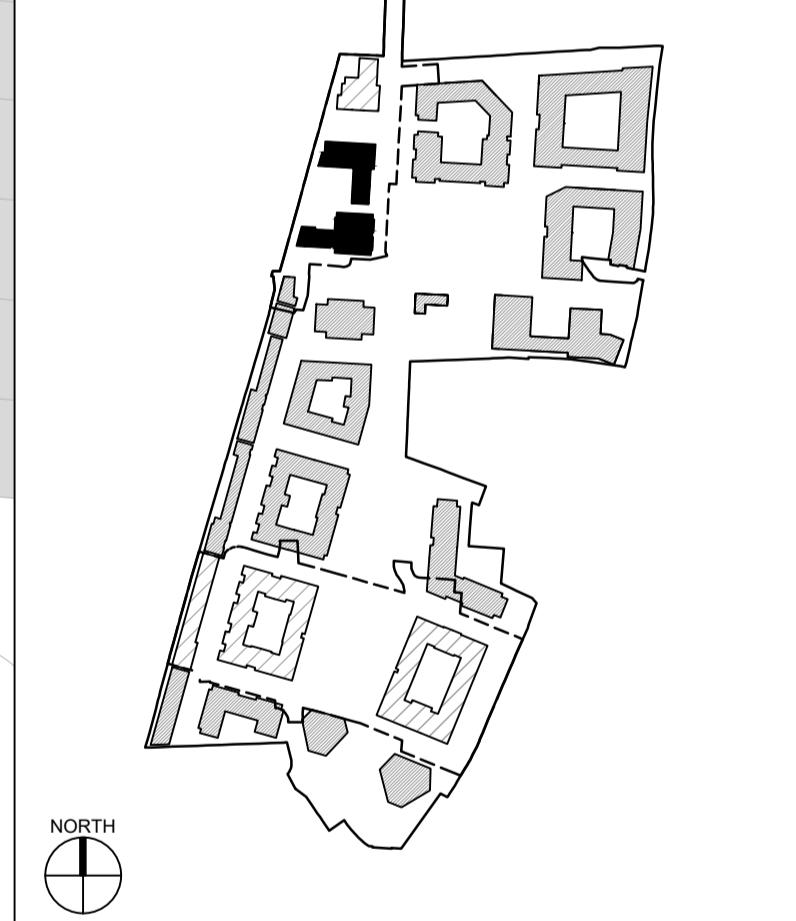
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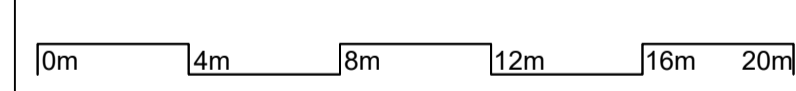
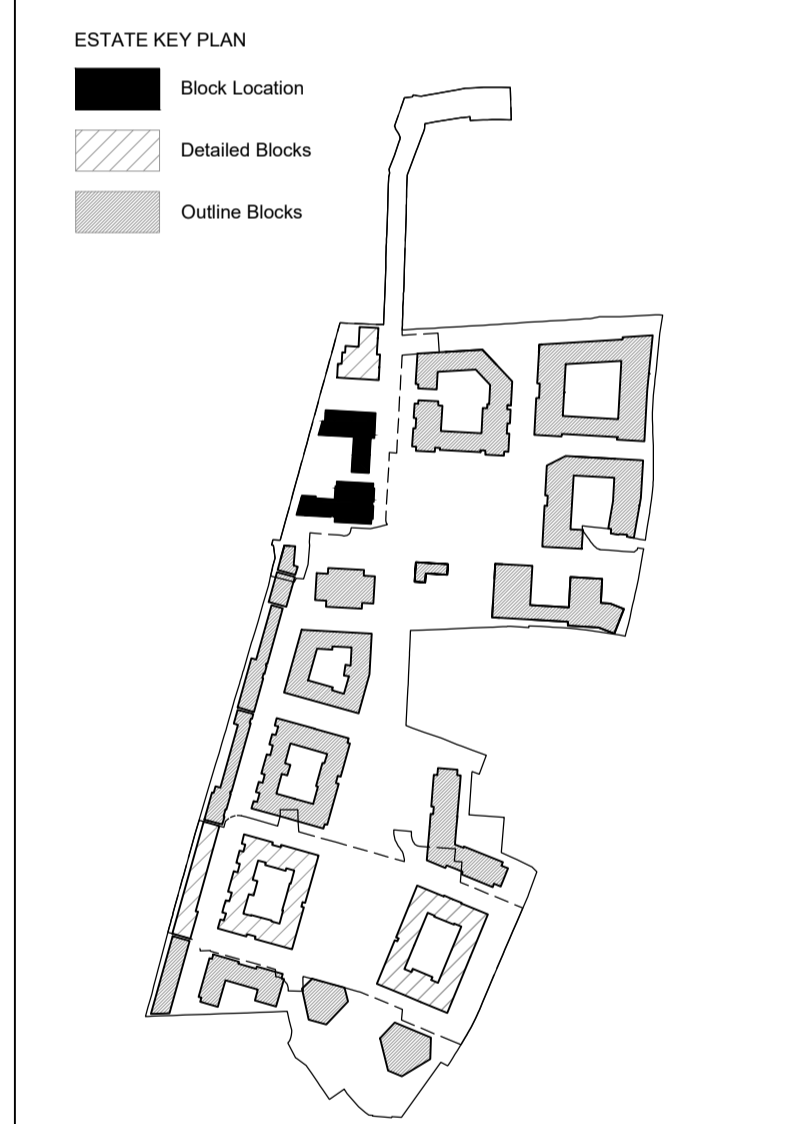
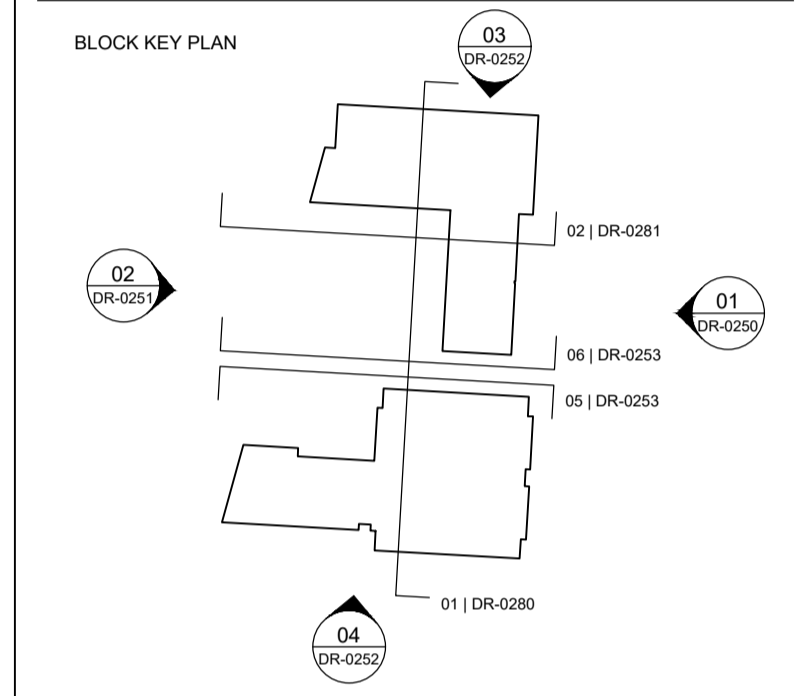
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Rev Date	Drawn	Description
Status		
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client / project		
LB Enfield		
Joyce & Snell's Estate Regeneration		
drawing title		
Block D - Level 00		
Proposed General Arrangement Plans		

drawing number	ENF-JSE-HTA-A-BD-DR-PL-0100	revision	PL1
scale @ A1	1:200	originated by	TCO
project code	ENF-JSE		
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PL1 05.04.24	TCO	Planning Issue
Rev Date	Drawn	Description
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client / project		
LB Enfield		
Joyce & Snell's Estate Regeneration		
drawing title		
Block D		
East Elevation		
drawing number		
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1 East Elevation
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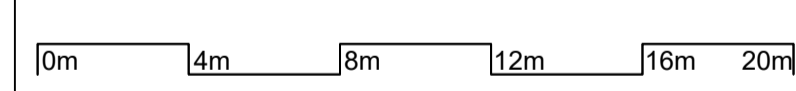
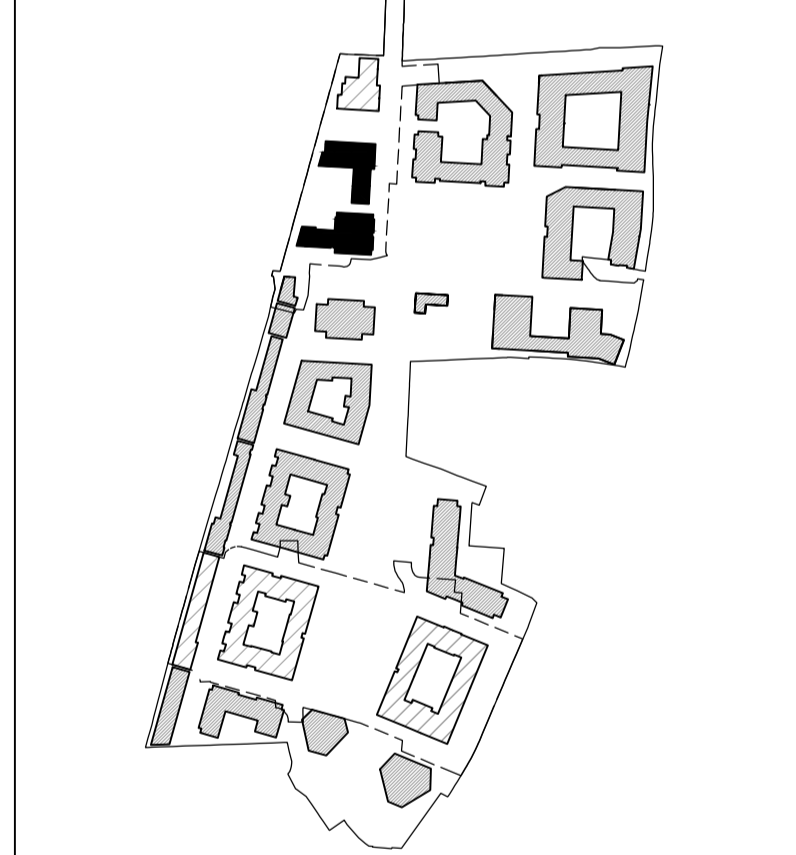
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S1 Dark Red/Brown	▶ Main Entrance
S2 Red/Brown	▶ Secondary Entrance
S3 Buff	▶ Home Entrance
S4 Red	
S5 Light Red	

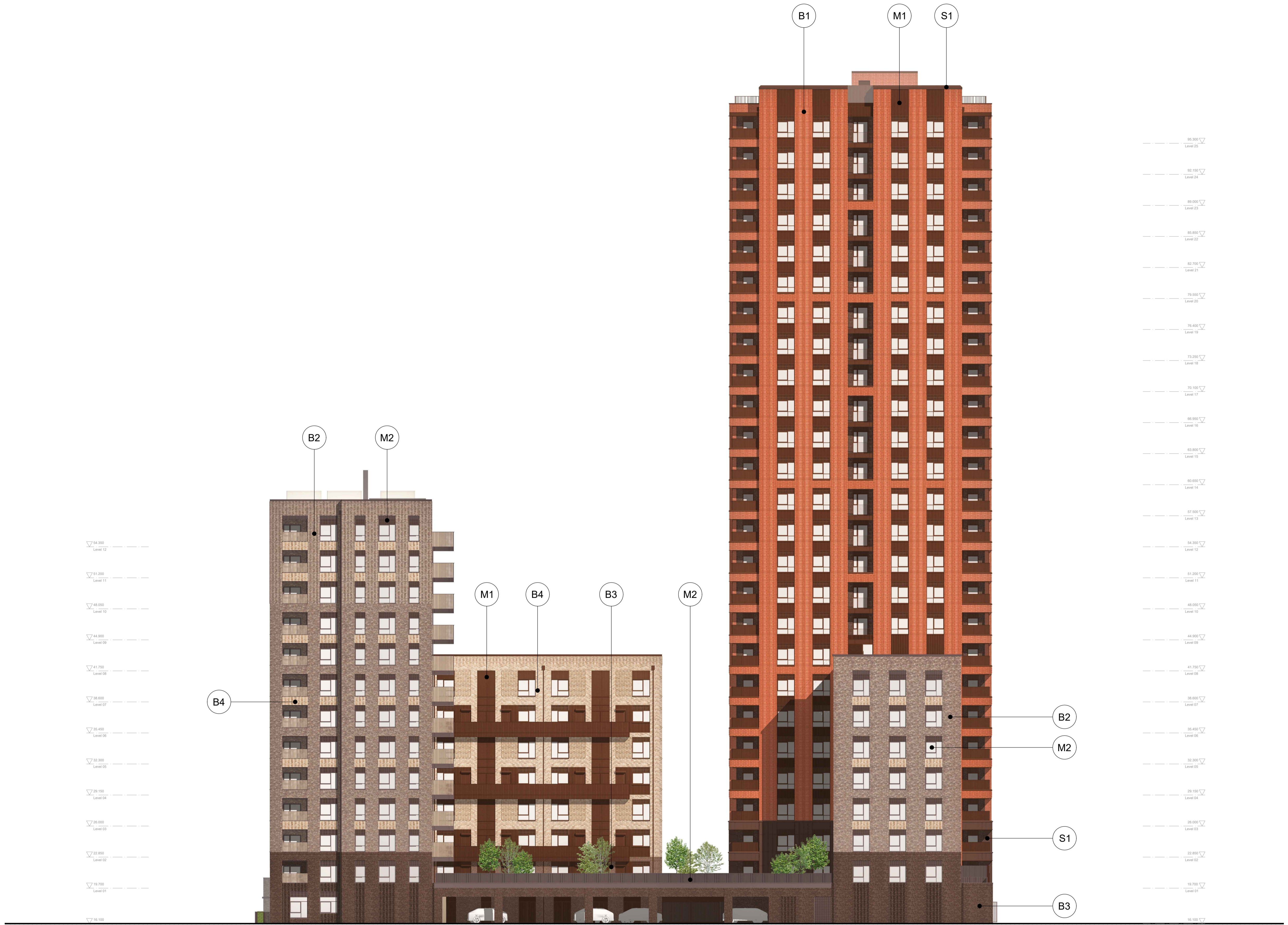
BLOCK KEY PLAN

ESTATE KEY PLAN	
■	Block Location
▨	Detailed Blocks
□	Outline Blocks



PL1	05.04.24	TCO	Planning Issue
Rev	Date	Drawn	Description
STATUS			
PLANNING ISSUE			
client / project			
LB Enfield			
Joyce & Snell's Estate Regeneration			
drawing title			
Block D			
West Elevation			

drawing number	ENF-JSE-HTA-A-BD-DR-PL-0251	revision	PL1
scale @ A1	1:200	project code	ENF-JSE
originated by	TCO		
HTA Design LLP www.hta.co.uk			
London Edinburgh Manchester Bristol			



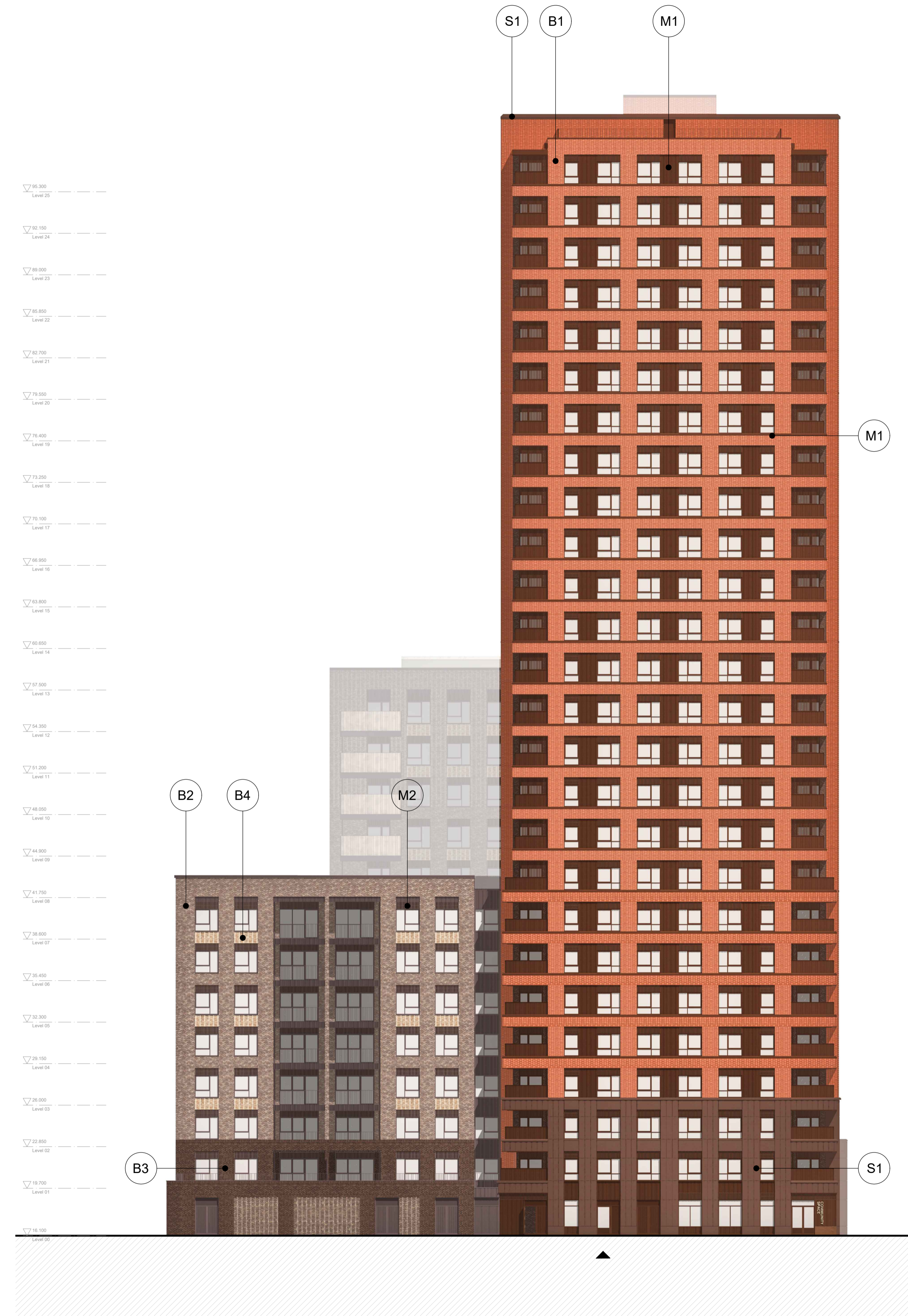
2 West Elevation
1 : 200

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3 North Elevation
1:200

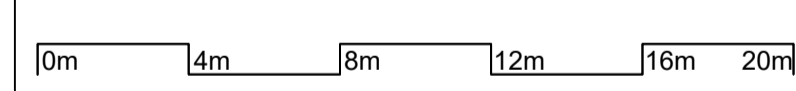
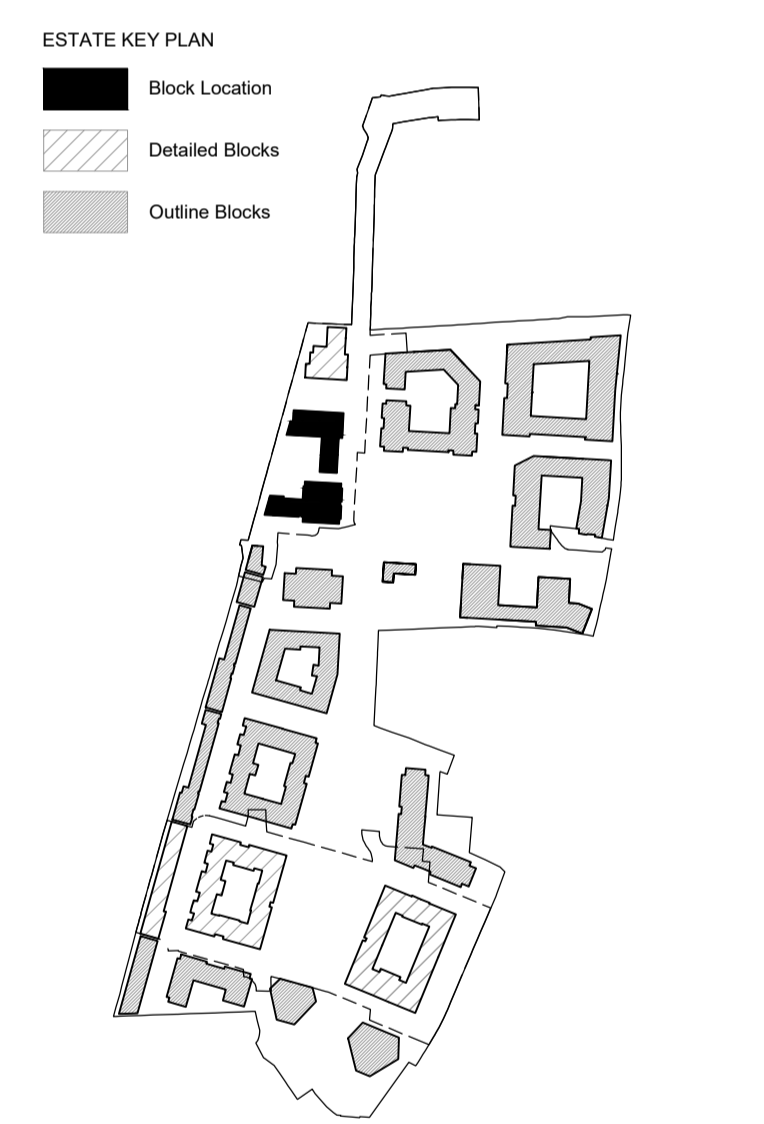
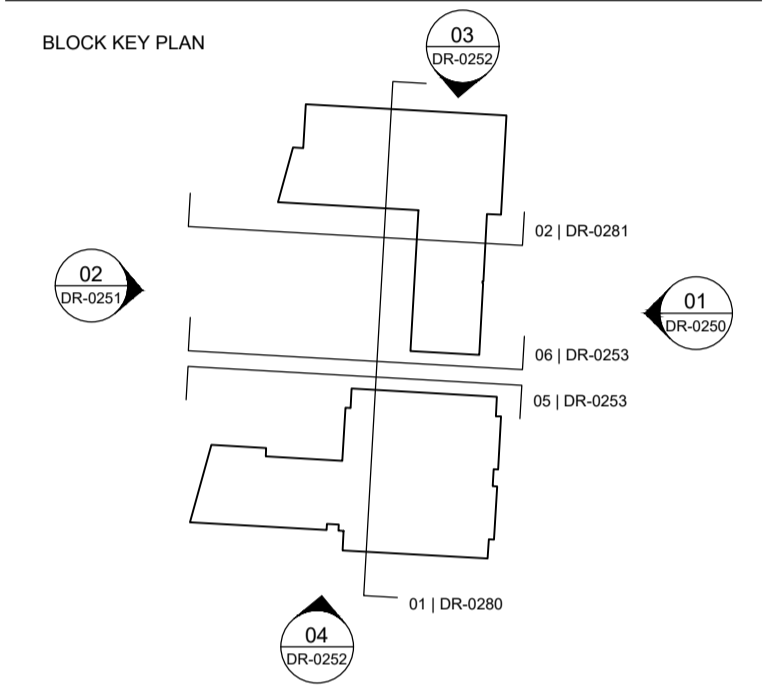


4 South Elevation
1:200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



PL1 05.04.24 TCO Planning Issue
 Rev Date Drawn Description
 STATUS
PLANNING ISSUE
 Client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 Drawing title
Block D
 North and South Elevations

drawing number ENF-JSE-HTA-A-BD-DR-PL-0252
 scale @ A1 1:200
 originated by TCO
 revision **PL1**
 project code ENF-JSE
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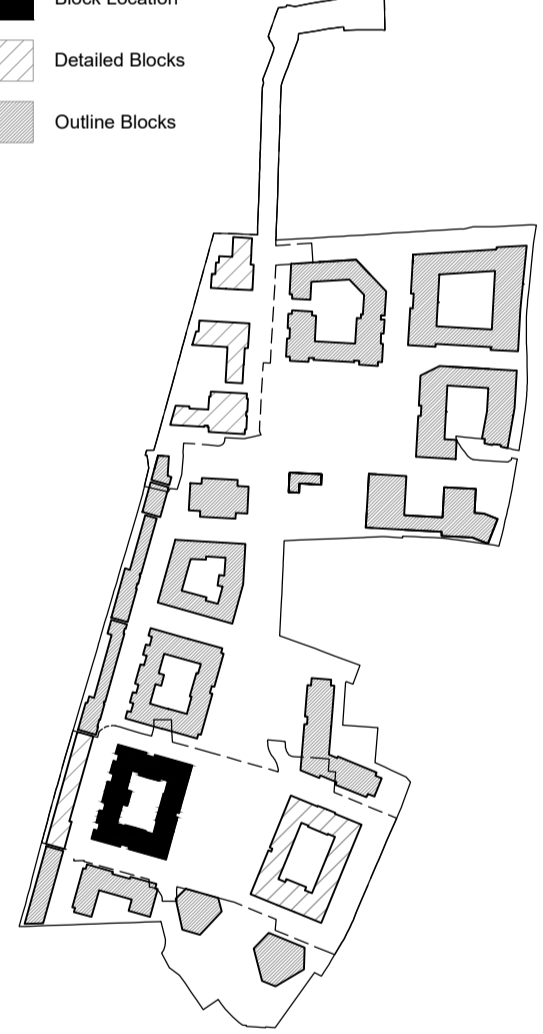
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- LEGEND**
- Hybrid Application Site Boundary
 - - - Extent of Development for Detailed Application
 - Proposed FFL
 - DR1 Dry Riser Inlet
 - DR Dry Riser
 - WRI Wet Riser Inlet
 - WR Wet Riser
 - ELSSR Electrical Life Safety Switch Room
 - EISR Electrical Intake/Switch Room
 - EL Evacuation Lift
 - FFL Firefighting Lift
 - Main Entrance
 - Secondary Entrance
 - Home Entrance

KEY PLAN

- Block Location
- Detailed Blocks
- Outline Blocks



NORTH



10m 4m 8m 12m 16m 20m

PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status

PLANNING ISSUE

client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration

drawing title
Block K - Level 00
 Proposed General Arrangement Plans

drawing number
 ENF-JSE-HTA-A-BK-DR-PL-0100

revision
PL1


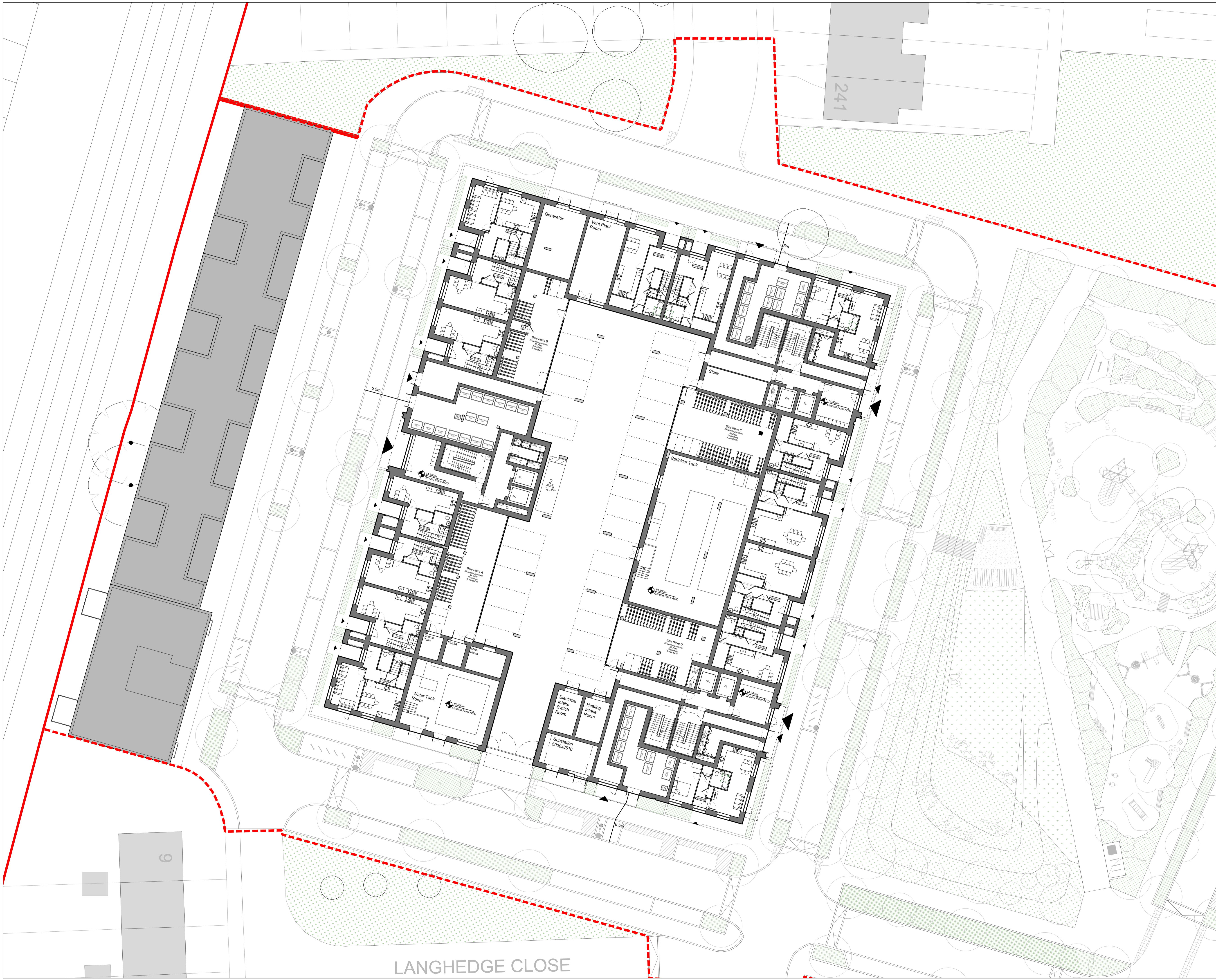
scale @ A1
 1:200

originated by
 DRE

project code
 ENF-JSE

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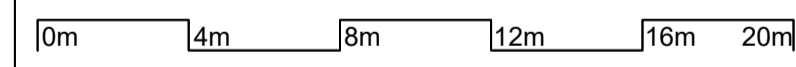
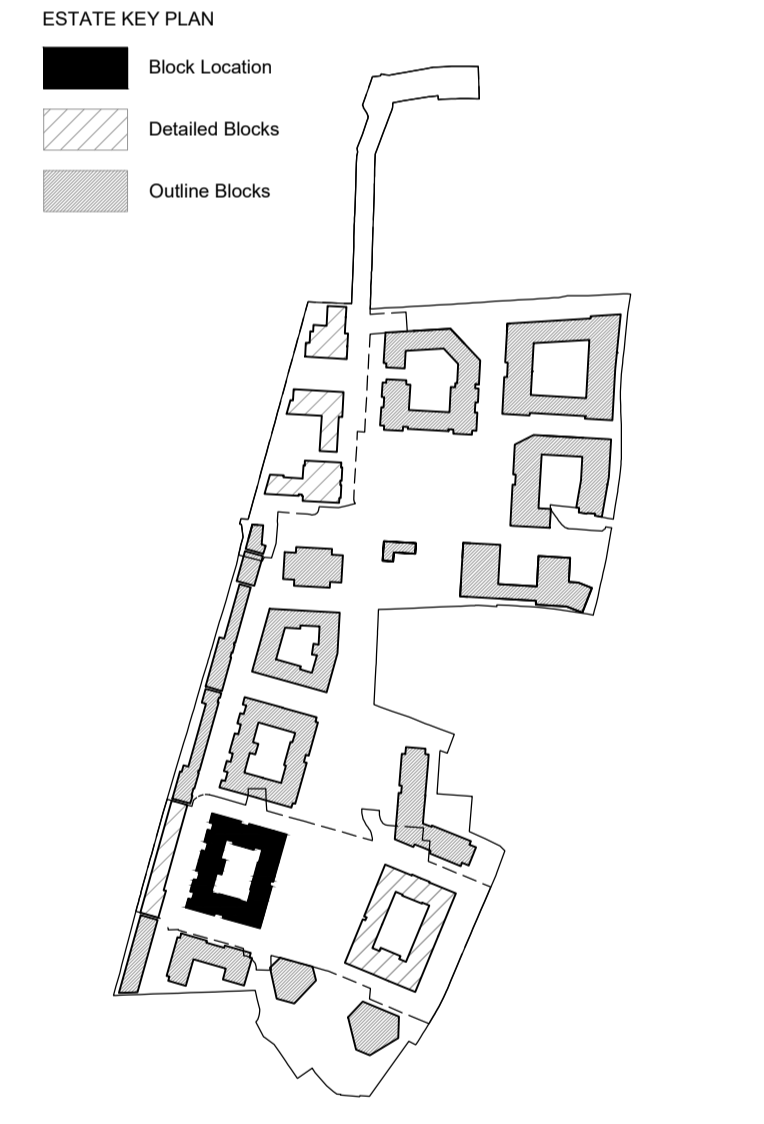
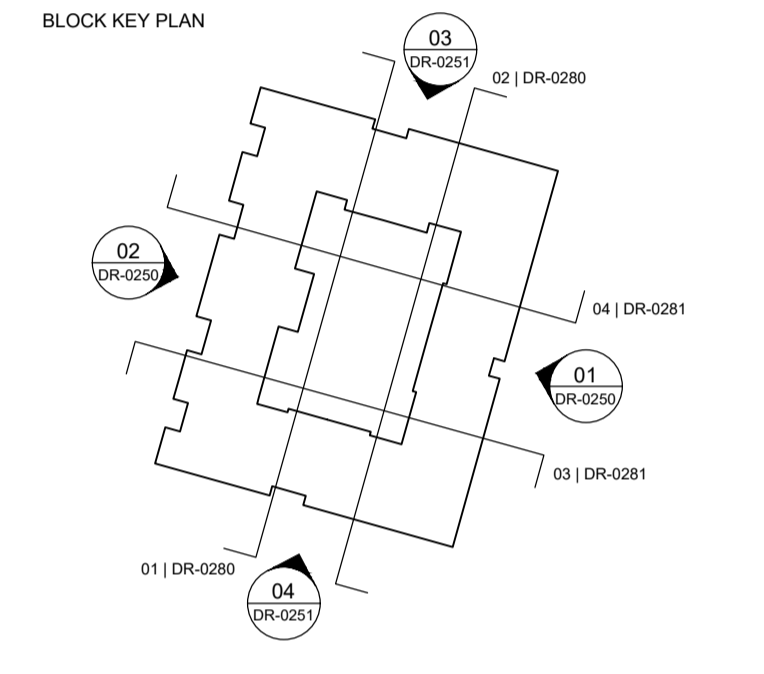
1 East Elevation
1 : 200



2 West Elevation
1 : 200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		
Reconstituted Stone:		Entrances:	
S1	Dark Red/Brown	▶	Main Entrance
S2	Red/Brown	▶	Secondary Entrance
S3	Buff	▶	Home Entrance
S4	Red		
S5	Light Red		



PL1 05.04.24 TCO Planning Issue
 Rev Date Drawn Description
 STATUS
PLANNING ISSUE
 Client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 Drawing title
Block K
 East and West Elevations
 drawing number
 ENF-JSE-HTA-A-BK-DR-PL-0250
 scale @ A1
 1:200
 originated by
 TCO
 revision
 PL1
 project code
 ENF-JSE
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3 North Elevation
1 : 200

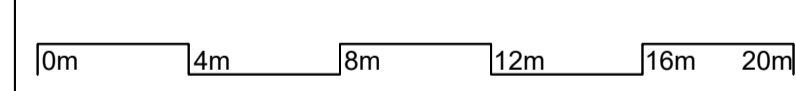
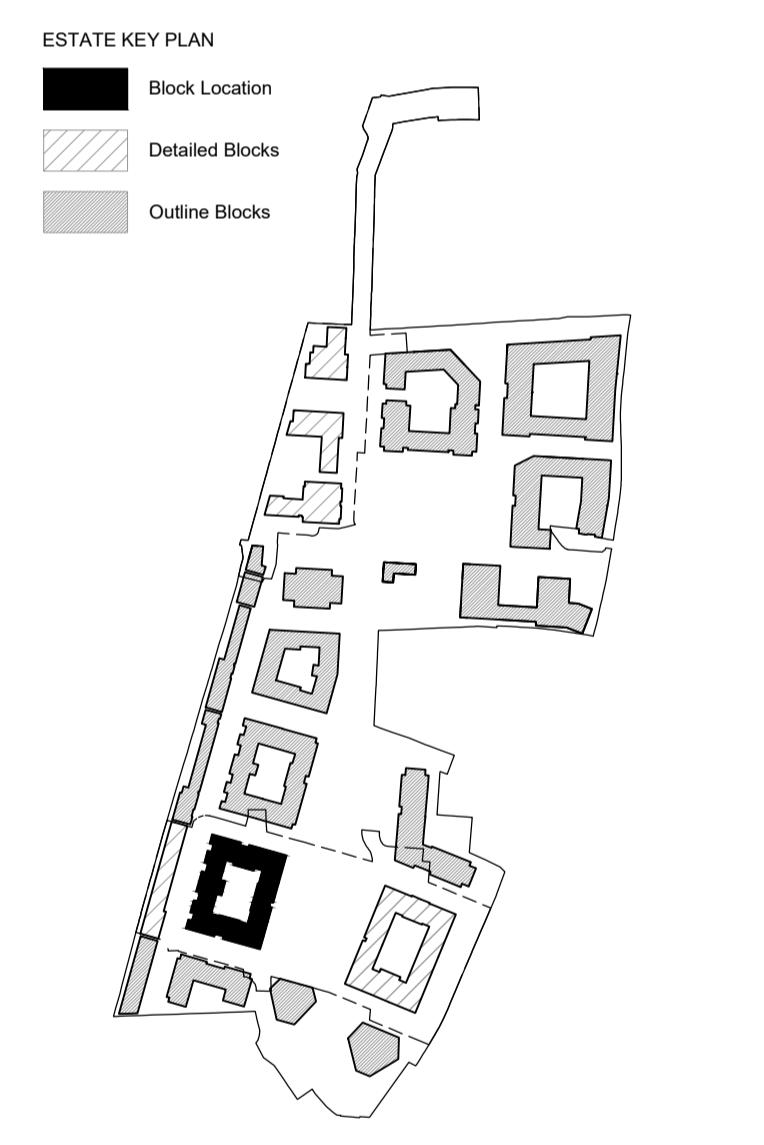
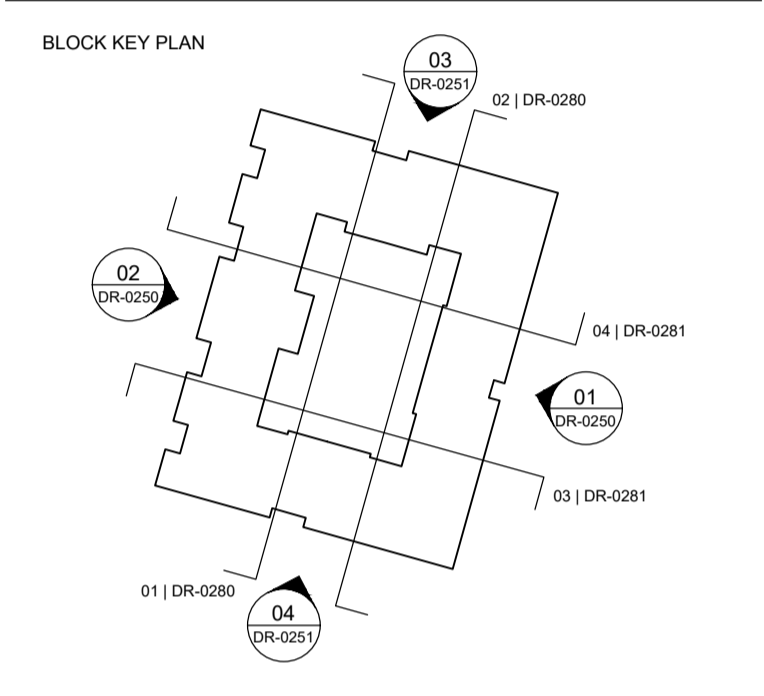


4 South Elevation
1 : 200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



PL1 05.04.24 TCO Planning Issue

Rev	Date	Drawn	Description
1			PLANNING ISSUE

client / project
LB Enfield
Joyce & Snell's Estate Regeneration

drawing title
Block K
North and South Elevations

drawing number
ENF-JSE-HTA-A-BK-DR-PL-0251

scale @ A1
1:200

originated by
TCO

revision
PL1

project code
ENF-JSE

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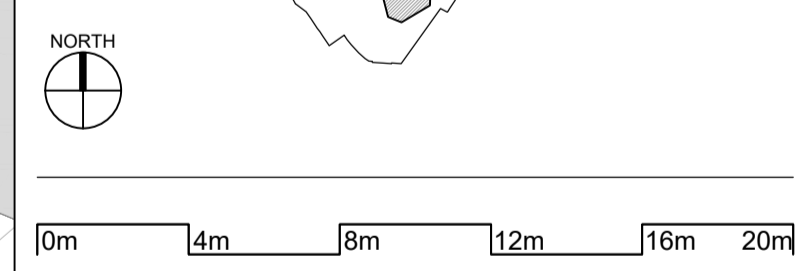
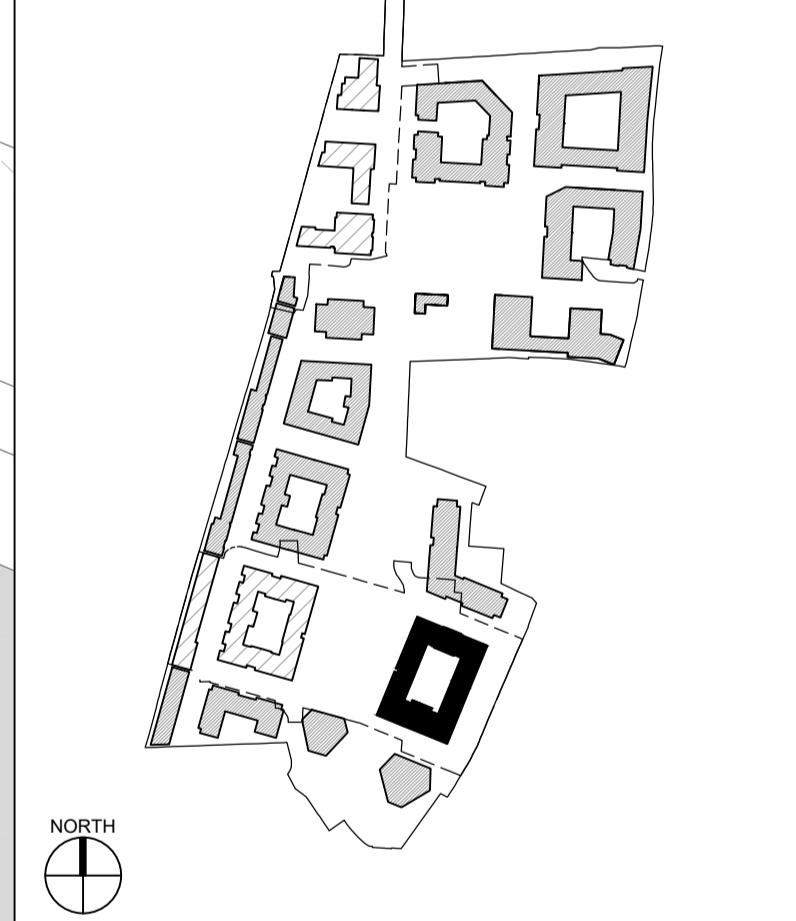
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- LEGEND**
- Hybrid Application Site Boundary
 - - - Extent of Development for Detailed Application
 - Proposed FFL
 - DR** Dry Riser Inlet
 - DR** Dry Riser
 - WRI** Wet Riser Inlet
 - WR** Wet Riser
 - ELSSR** Electrical Life Safety Switch Room
 - EISR** Electrical Intake/Switch Room
 - EL** Evacuation Lift
 - FFL** Firefighting Lift
 - Main Entrance
 - Secondary Entrance
 - Home Entrance

- KEY PLAN**
- Block Location
 - Detailed Blocks
 - Outline Blocks



PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block N - Level 00
 Proposed General Arrangement Plans

drawing number
ENF-JSE-HTA-A-BN-DR-PL-0100 revision
PL1
 scale @ A1 originated by project code
1:200 DRE ENF-JSE
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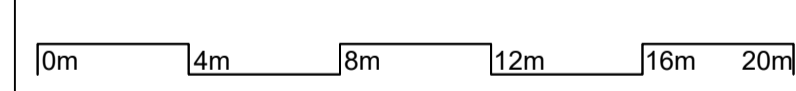
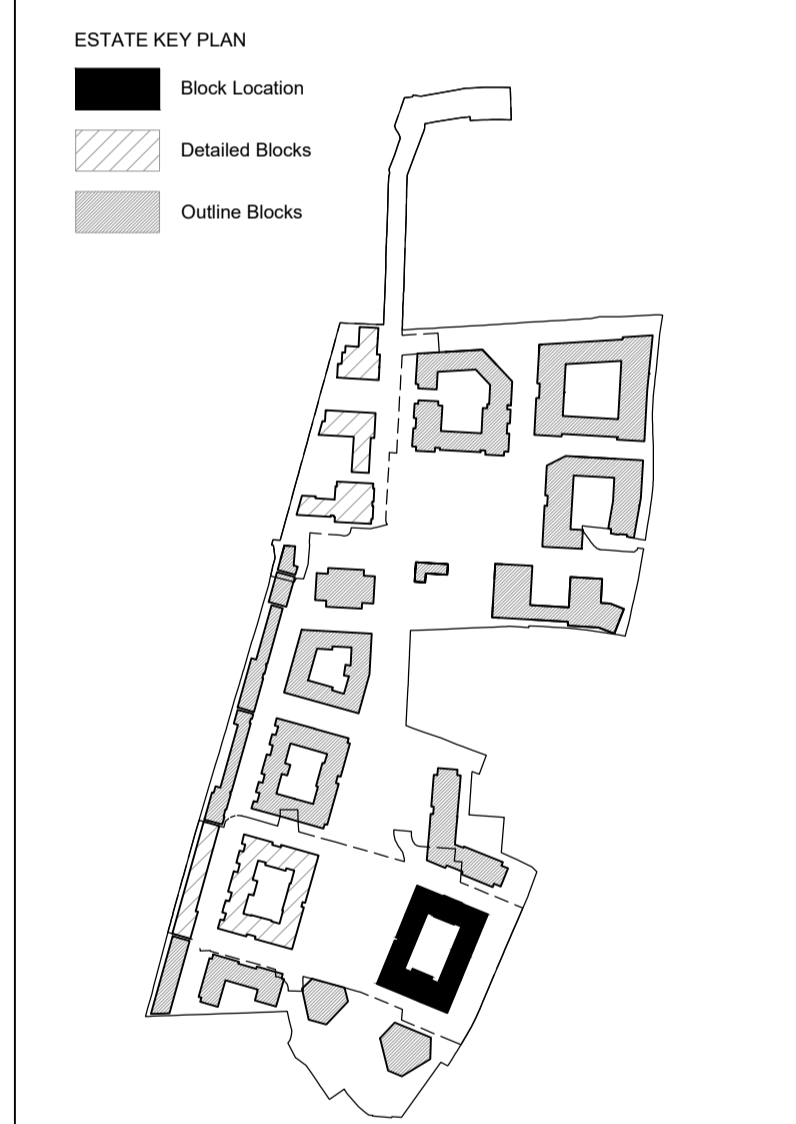
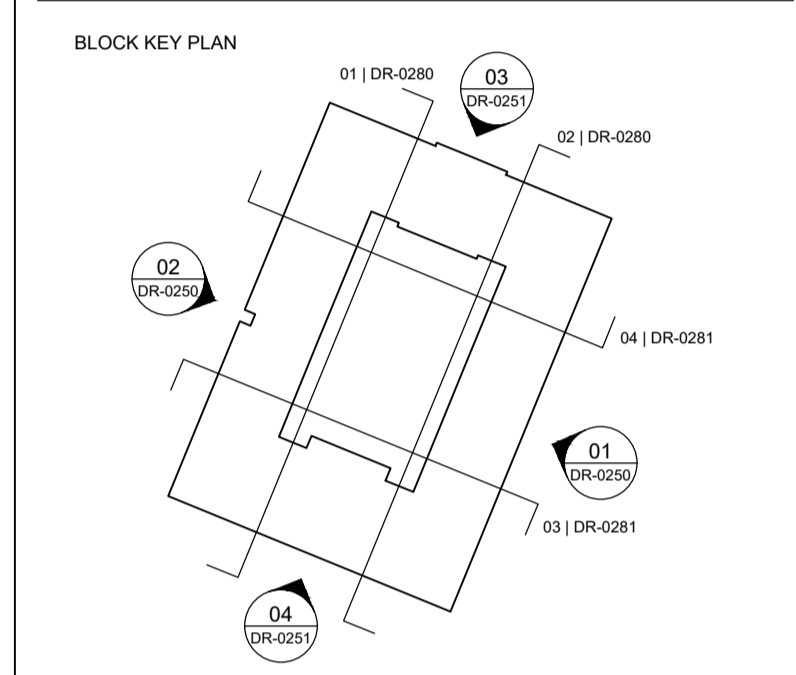
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LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

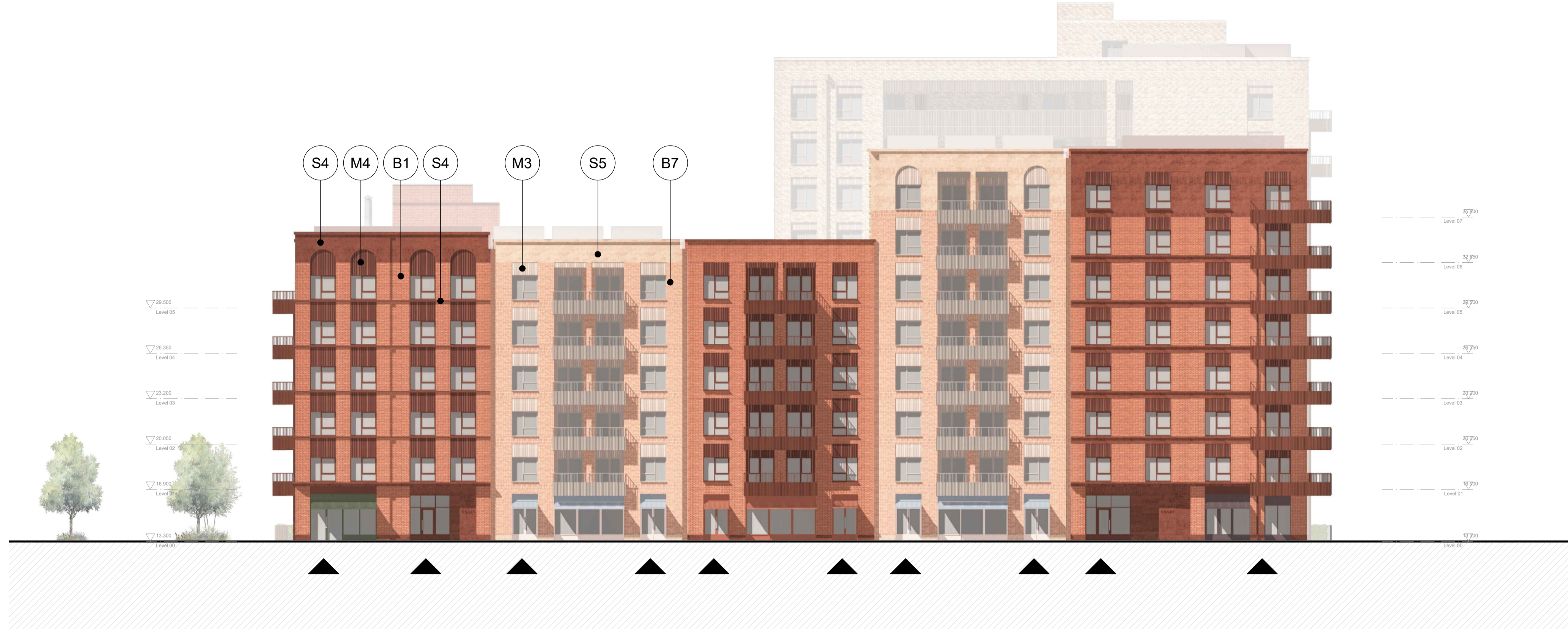
Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block N
 East and West Elevations

drawing number
 ENF-JSE-HTA-A-BN-DR-PL-0250
 scale @ A1
 1:200
 DRE
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PL1
 originated by
 project code
 ENF-JSE



1 East Elevation
 1 : 200



2 West Elevation
 1 : 200

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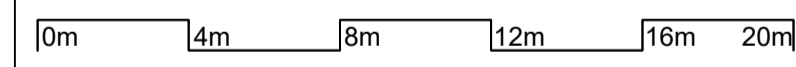
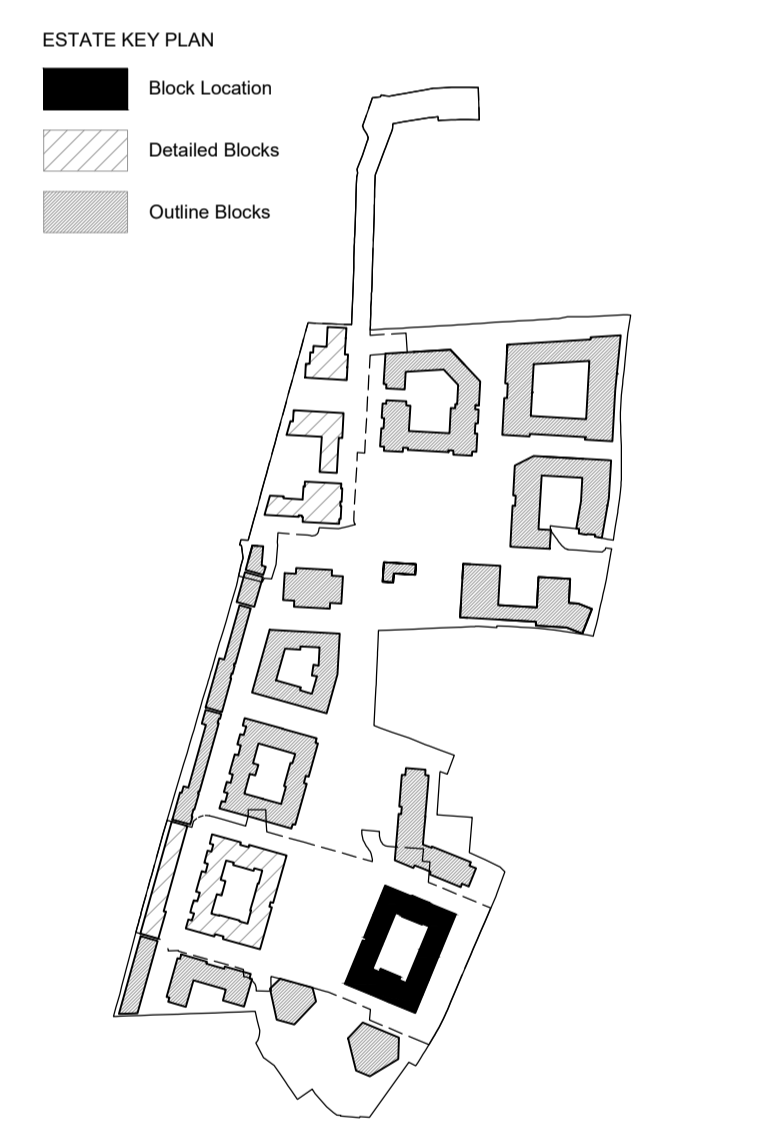
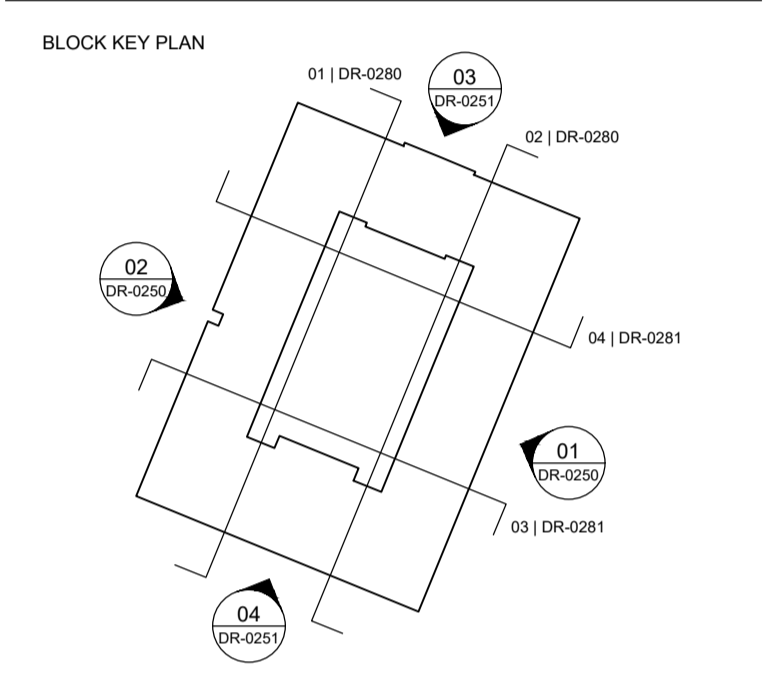
3 North Elevation
1 : 200



4 South Elevation
1 : 200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		
Reconstituted Stone:		Entrances:	
S1	Dark Red/Brown	▶	Main Entrance
S2	Red/Brown	▶	Secondary Entrance
S3	Buff	▶	Home Entrance
S4	Red		
S5	Light Red		



PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block N
 North and South Elevations

drawing number
 ENF-JSE-HTA-A-BN-DR-PL-0251
 scale @ A1
 1:200
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revision
PL1
 project code
 ENF-JSE

LEGEND

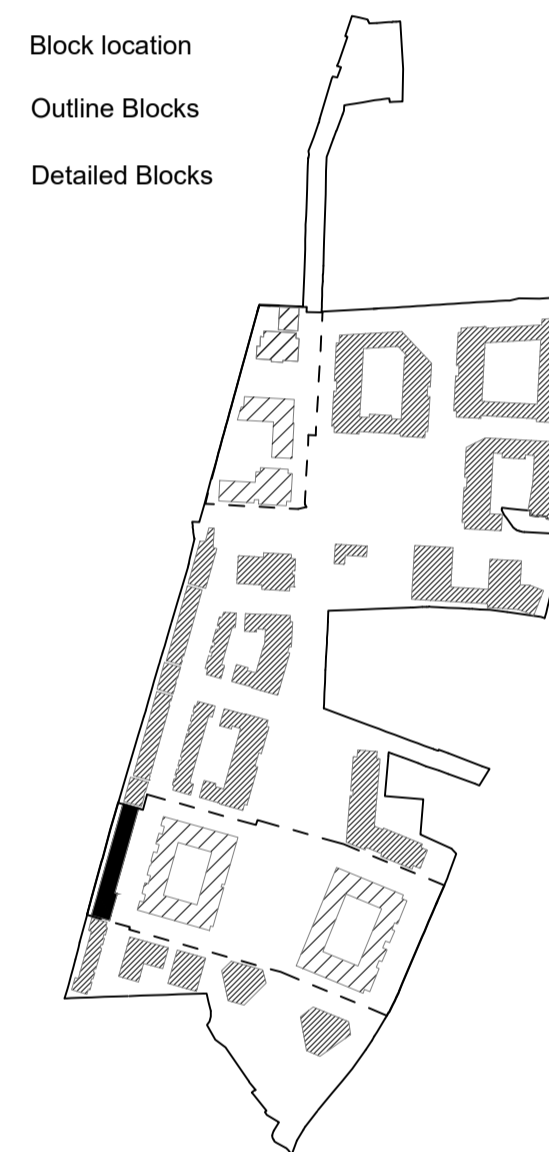
- Hybrid application site boundary
- - - Detailed application site boundary

- DRI Dry riser inlet
- DRO Dry riser outlet
- WR Wet riser
- EISR Electrical intake/switch room
- ELSSR Electrical life safety switch room
- HBIR Heating block intake room

Tenure:

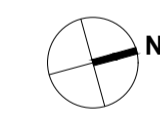
- SRD Social rent decant
- SED Shared equity decant
- SRU Social rent uplift
- SO Shared ownership
- MS Market sale

- Block location
- Outline Blocks
- Detailed Blocks



Page 174

True North



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FOR PLANNING

revision	date	drawn	description
-	22.09.22	JT	Planning issue

Block T-GA-Levels 00 and 01
 General Arrangement Plans

ENF-JSE-SGI-A-DR-T-PL-0200
 number

LB Enfield
 Joyce and Snell's Estate Regeneration

ENF-JSE job reference 1:200 @ A1 scale JT drawn

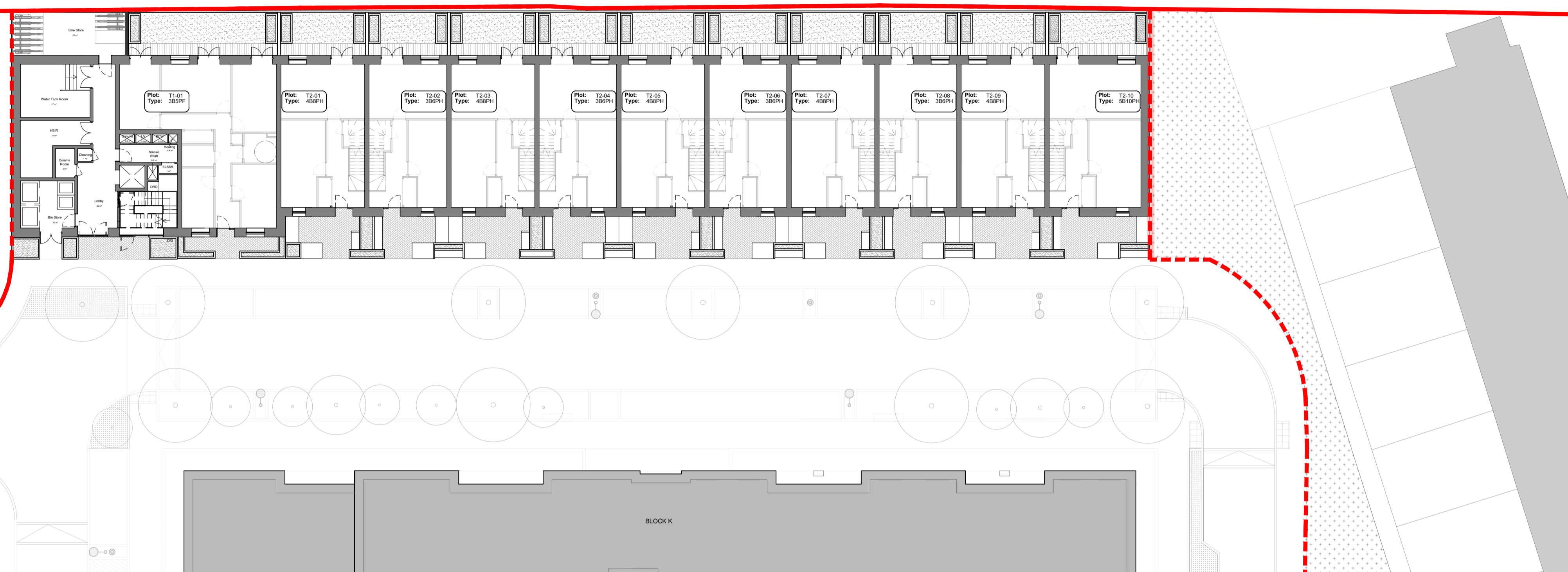
0m 4m 8m 12m 16m 20m

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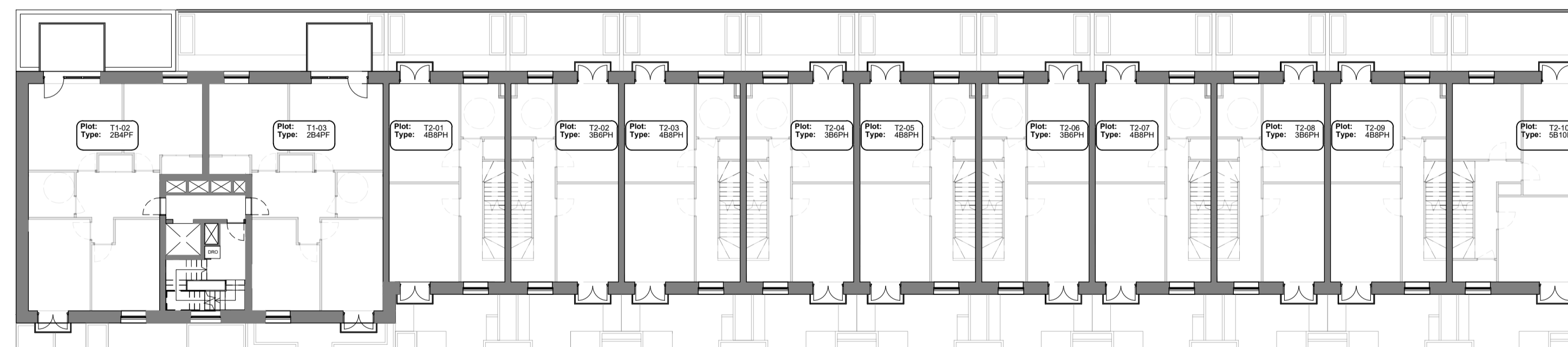
RAILWAY LINE

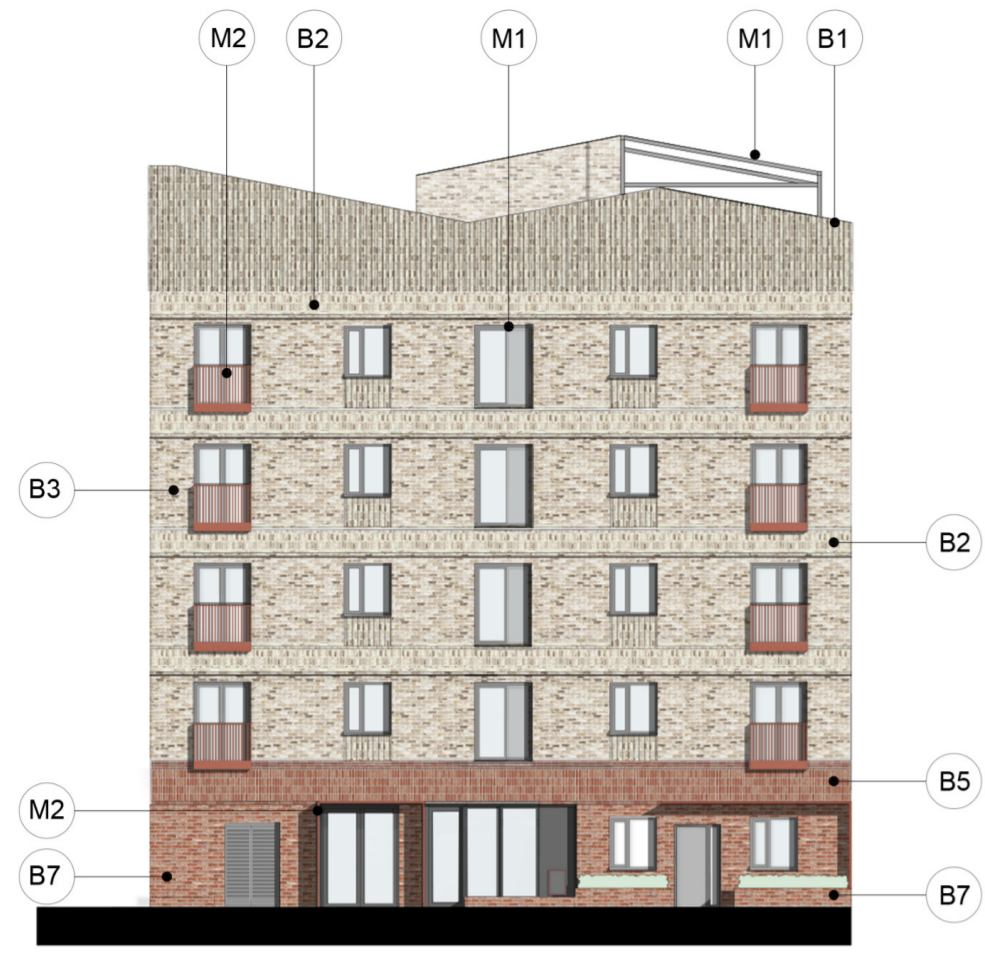
BLOCK K

1 Block T Level 00
 1 : 200



2 Block T Level 01
 1 : 200





1 Block T East Elevation Apartment Block
1 : 200



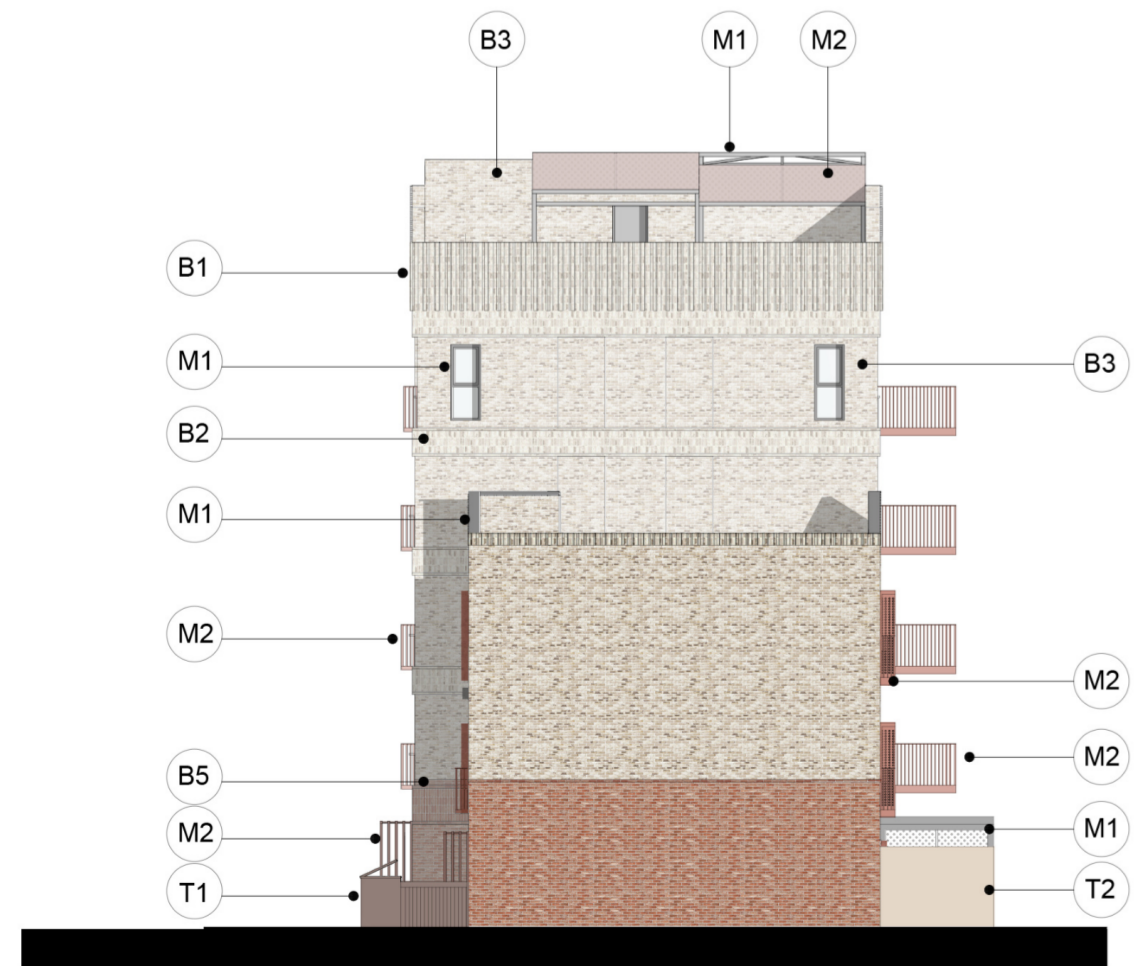
2 Block T East Elevation Houses
1 : 200



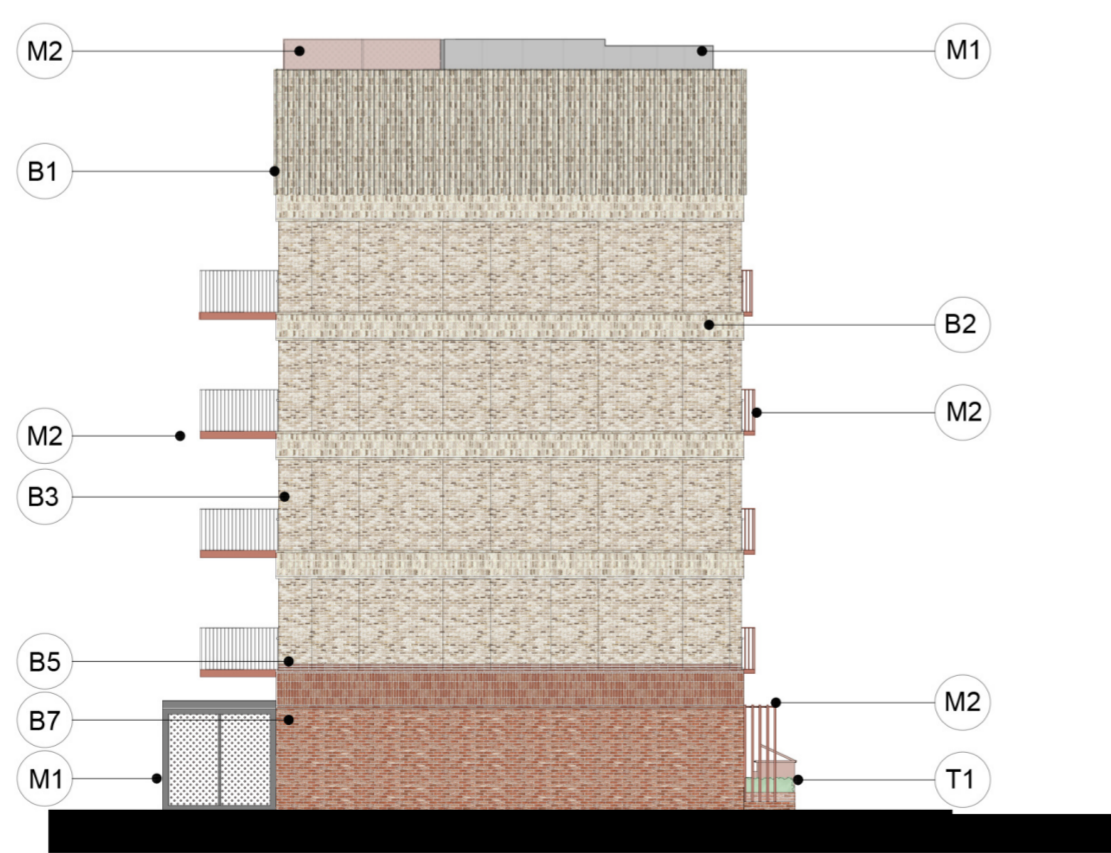
3 Block T West Elevation Apartment Block
1 : 200



4 Block T West Elevation Houses
1 : 200

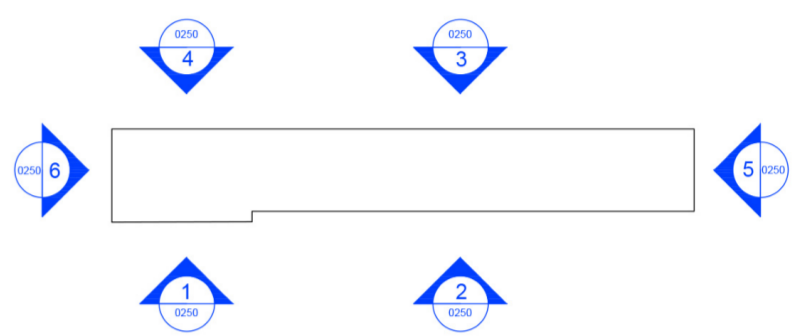


5 Block T North Elevation
1 : 200



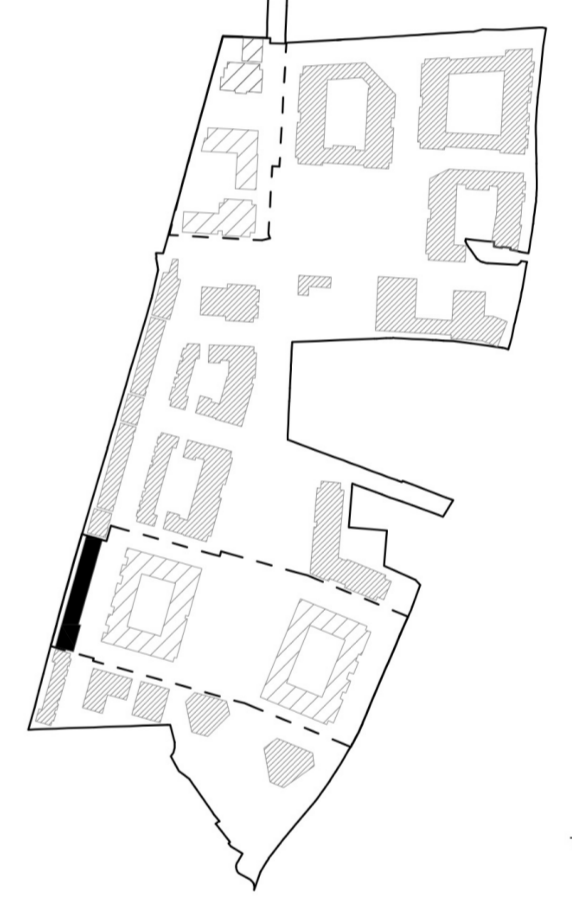
6 Block T South Elevation
1 : 200

- Materiality Legend:**
- Brick**
 - B1 - White/Buf Multi - Stacked Soldier Course - Projected Band
 - B2 - White/Buf Multi - Stacked Soldier Course - Projected Band
 - B3 - White/Buf Multi - Stretcher Course
 - B4 - Red Multi - Stacked Soldier Course - Corduroy Detail
 - B5 - Red Multi - Stacked Soldier Course - Projected Band
 - B6 - Red Multi - Stretcher Course - Projected Single Course
 - B7 - Red Multi - Stretcher Course
 - Metal**
 - M1 - Grey RAL 7043
 - M2 - Red-Brown RAL 410-M
 - GRC**
 - G1 - Red-Brown
 - Timber**
 - T1 - Red-Brown
 - T2 - Stiated



Elevations Plan Block T

- Block location
- Outline Blocks
- Detailed Blocks



Page 175

NOTES:
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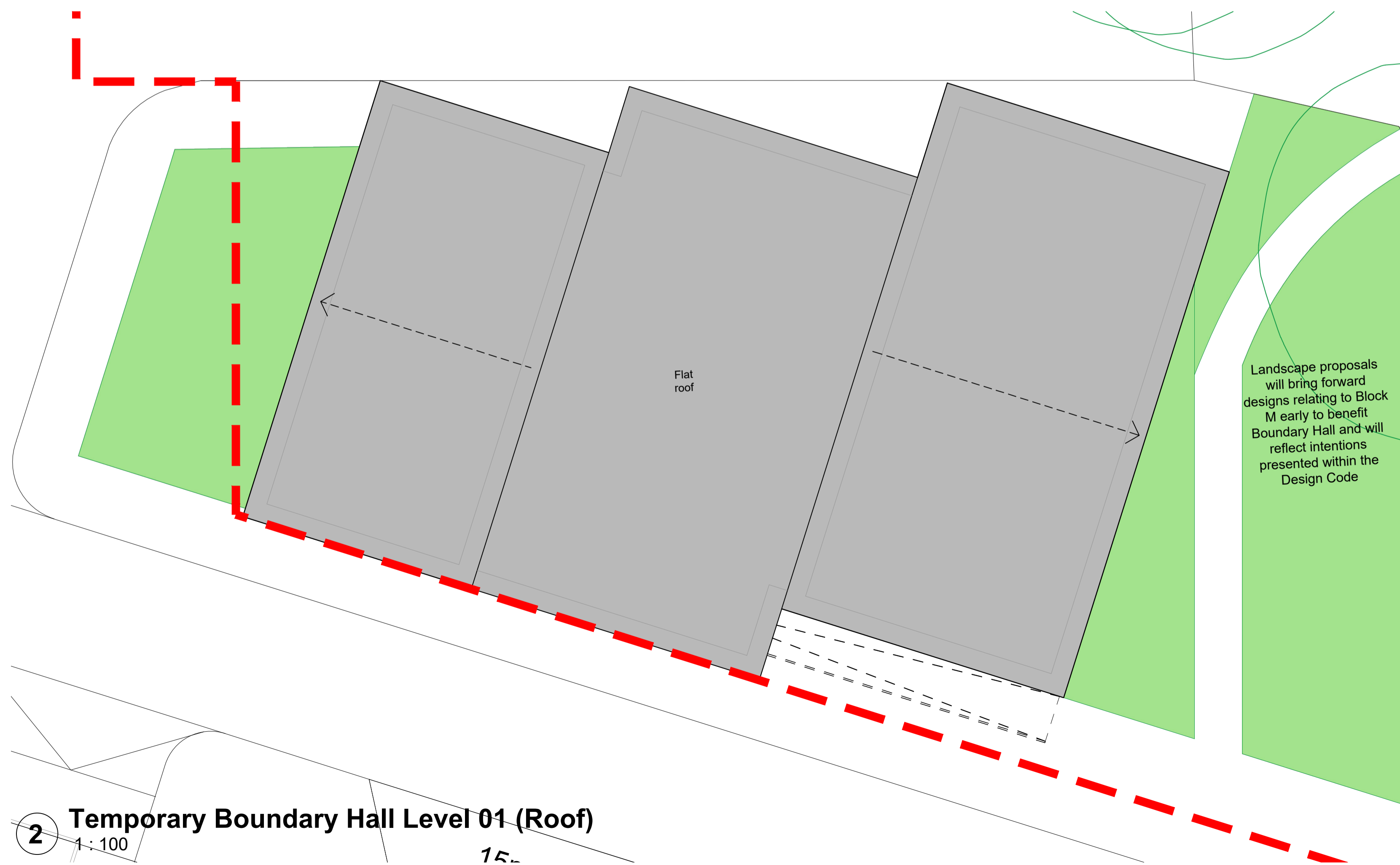
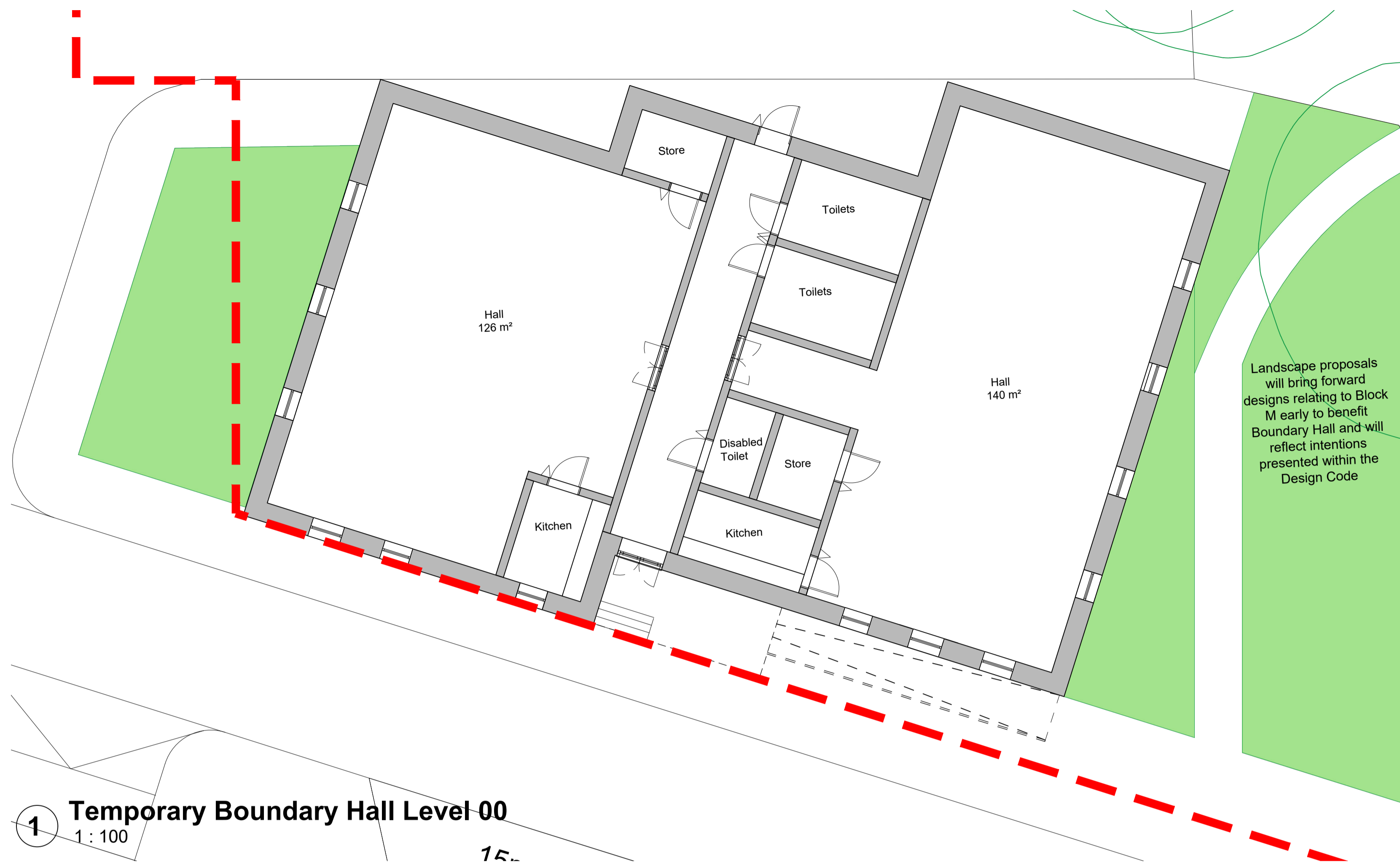
FOR PLANNING

revision	date	drawn	description
1	22.09.22	JHS	Planning issue
2	09.12.22	JHS	Planning issue

Block T-GA-Elevations
Proposed East, West, North and South Elevations

ENF-JSE-SGI-A-DR-T-PL-0250 2
number revision

LB Enfield
Joyce and Snell's Estate Regeneration
ENF-JSE 1:200 @ A1 JHS
job reference scale drawn
0m 4m 8m 12m 16m 20m
HTA Design LLP
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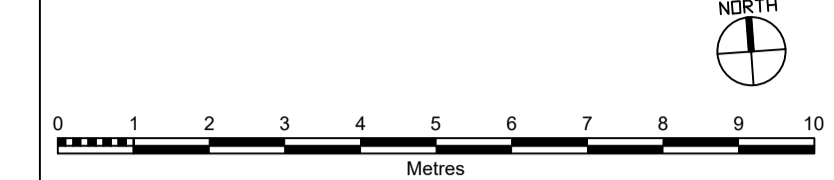


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Legend

- Hybrid application site boundary
- Extent of development for detailed application
- Land within applicant ownership within masterplan area



Rev	Date	Drawn	Description
E	05.04.24	RRO	Planning issue
D	01.03.24	RRO	Draft planning issue
C	30.06.23	RRO	Amended drawing title
B	19.05.23	RRO	Draft planning issue
A	15.12.22	RRO	Updated design
-	30.09.22	RRO	Planning issue

PLANNING

client / project
LB Enfield

Joyce & Snell's Estate Regeneration

drawing title
**Temporary Boundary Hall
Proposed Plans**

drawing number
ENF-JSE-HTA-A-DR-BH-PL-0200

scale @ A1
1:100

originated by
RRO

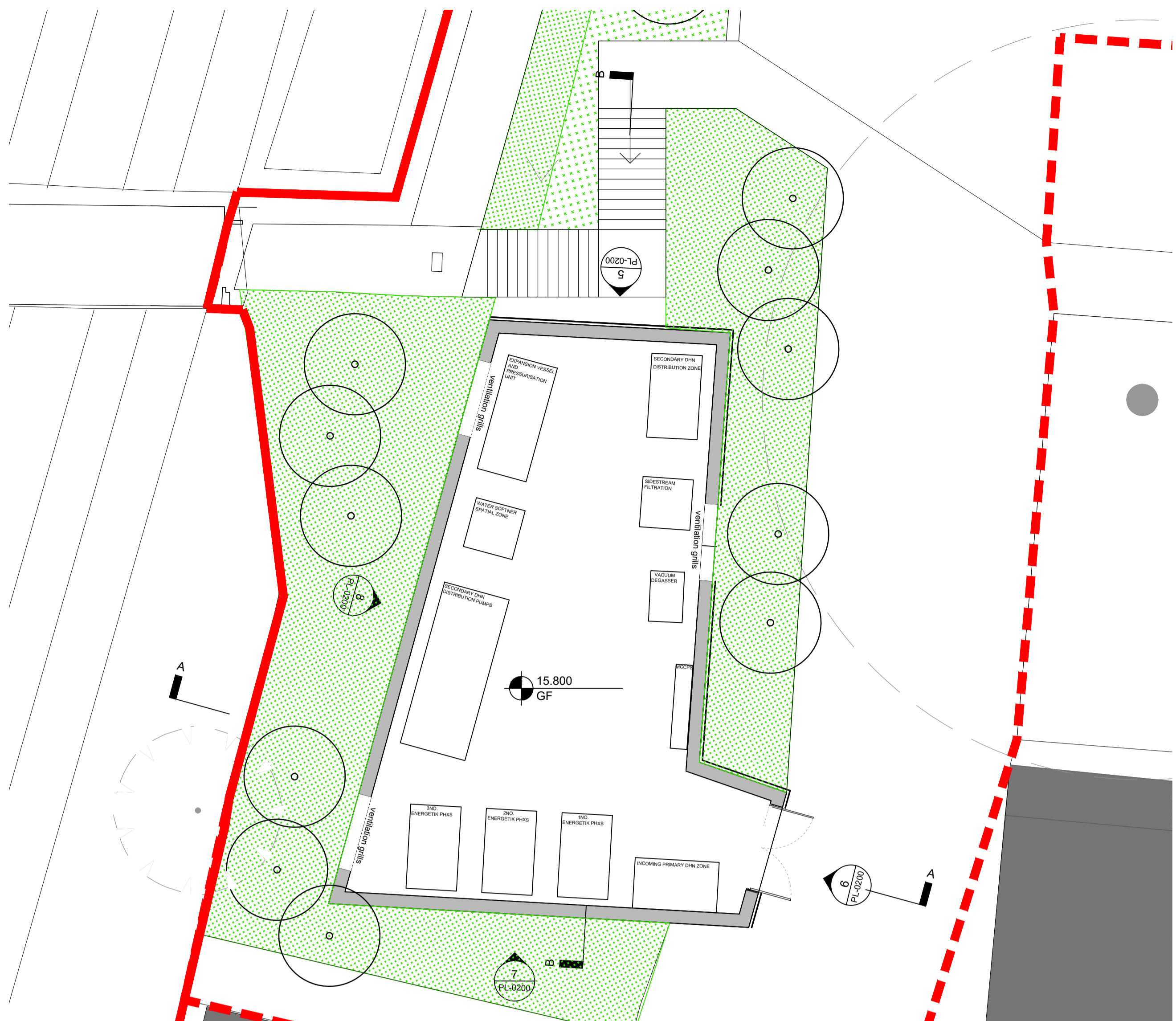
revision
E

project code
ENF-JSE

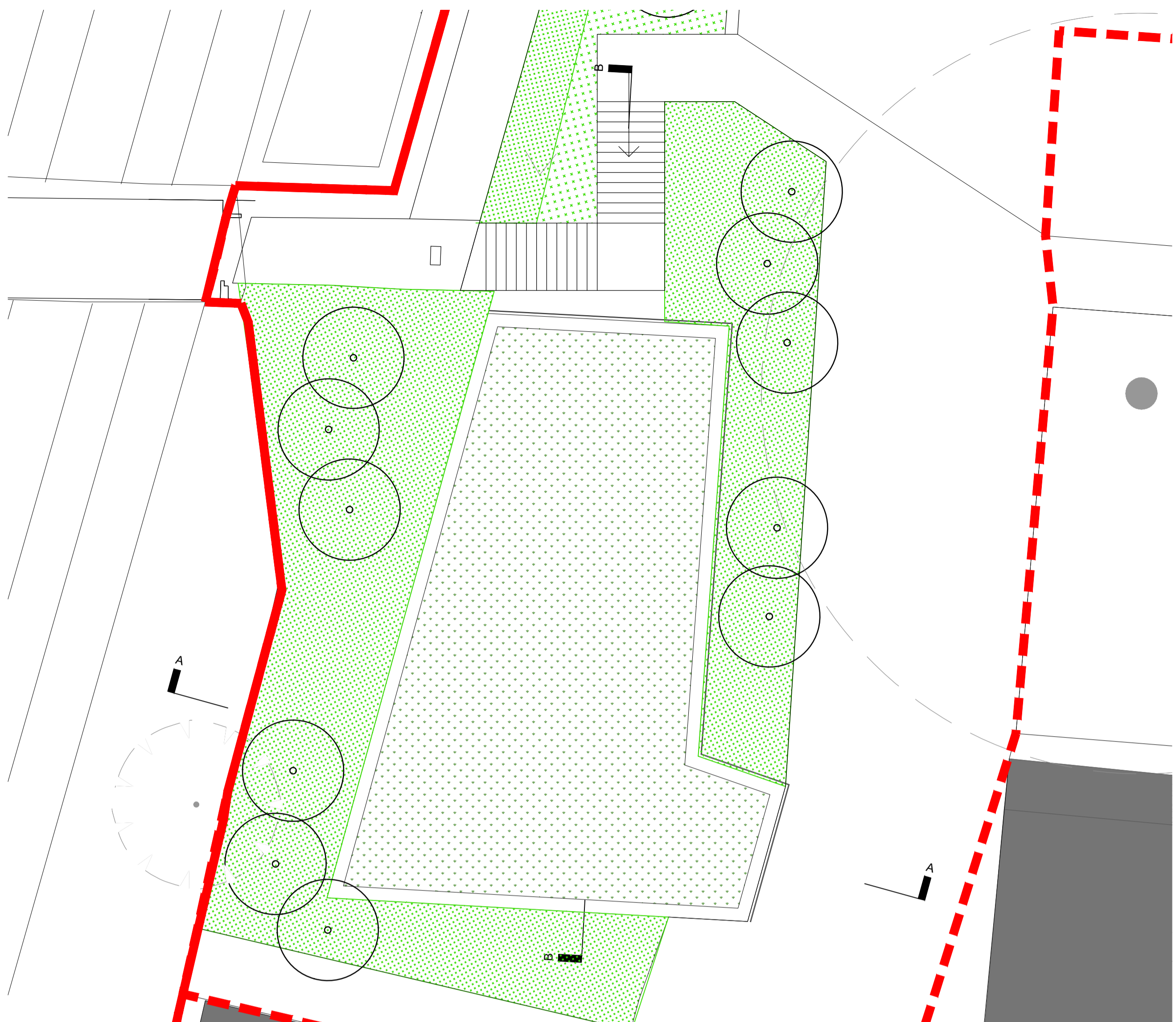
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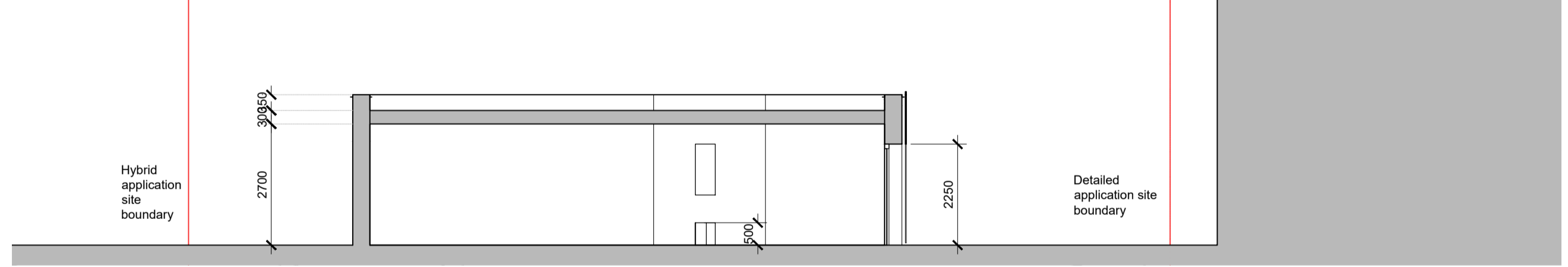




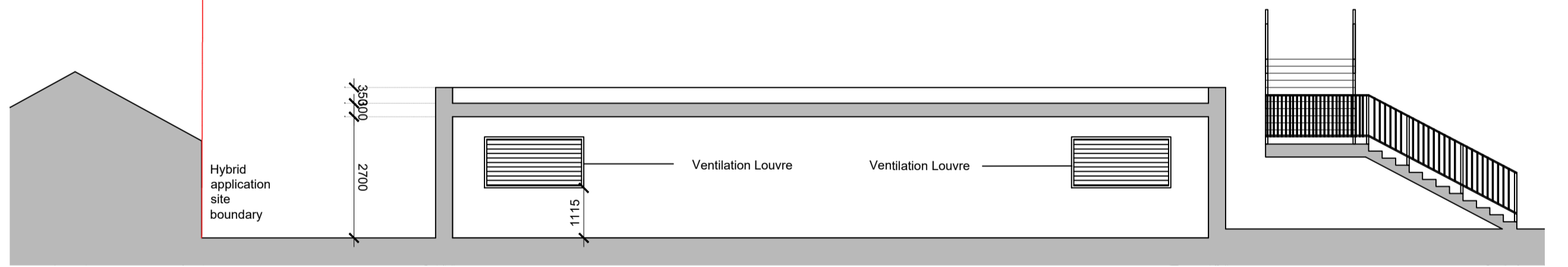
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1:100



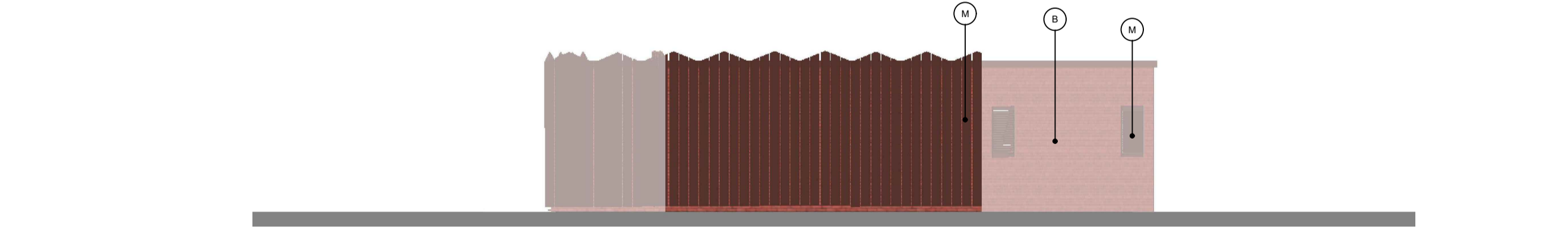
2 Roof Plan
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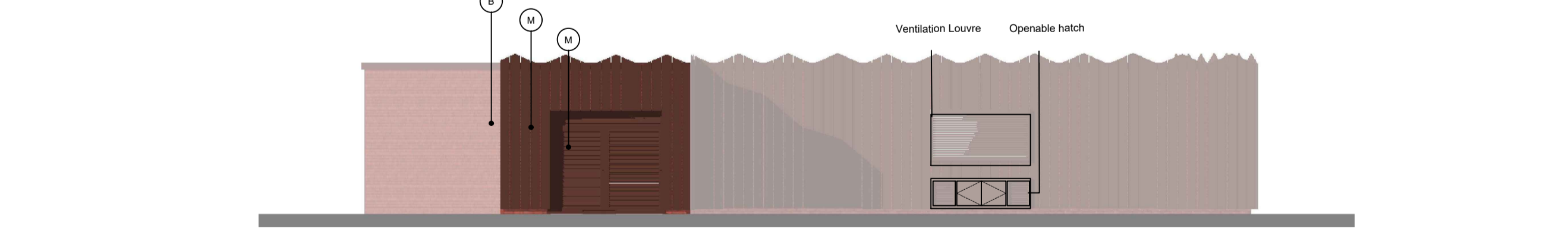
3 Section AA
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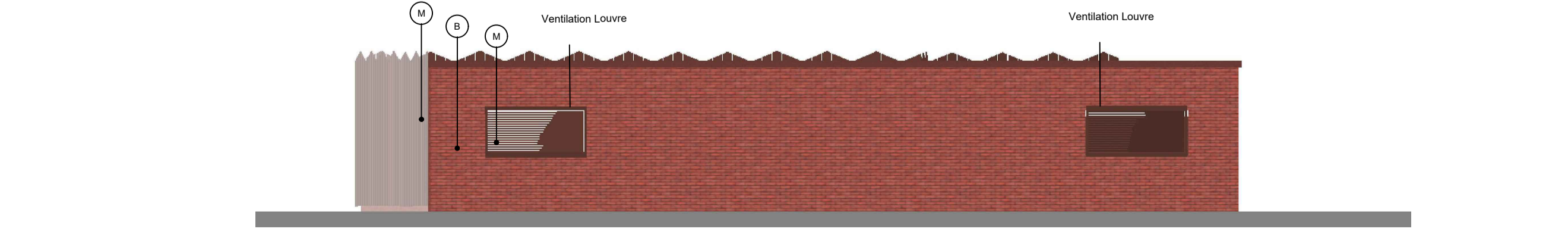
4 Section BB
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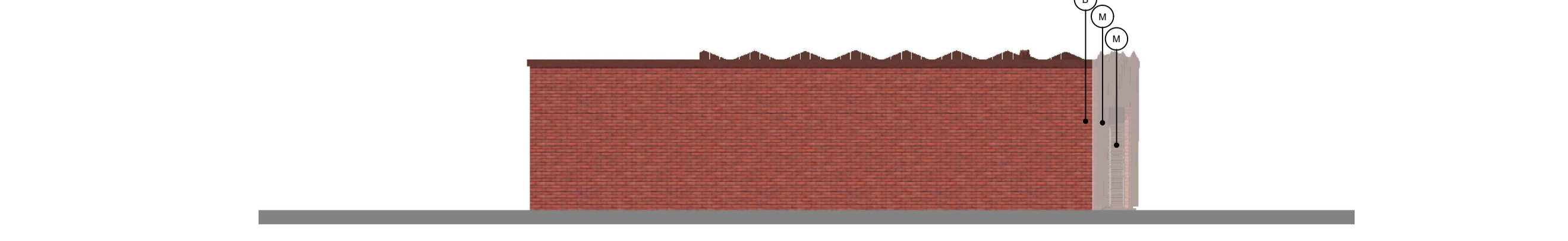
5 Elevation 001
1:100



6 Elevation 002
1:100



7 Elevation 003
1:100



8 Elevation 004
1:100

- Hybrid application site boundary
- - - - - Detailed application site boundary
- B Brickwork - dark red
- M Metalwork - dark red

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FOR PLANNING

revision	date	drawn	description
-	14.12.22	PCH	Planning Issue

Energy Centre
Proposed Plans, Sections and Elevations

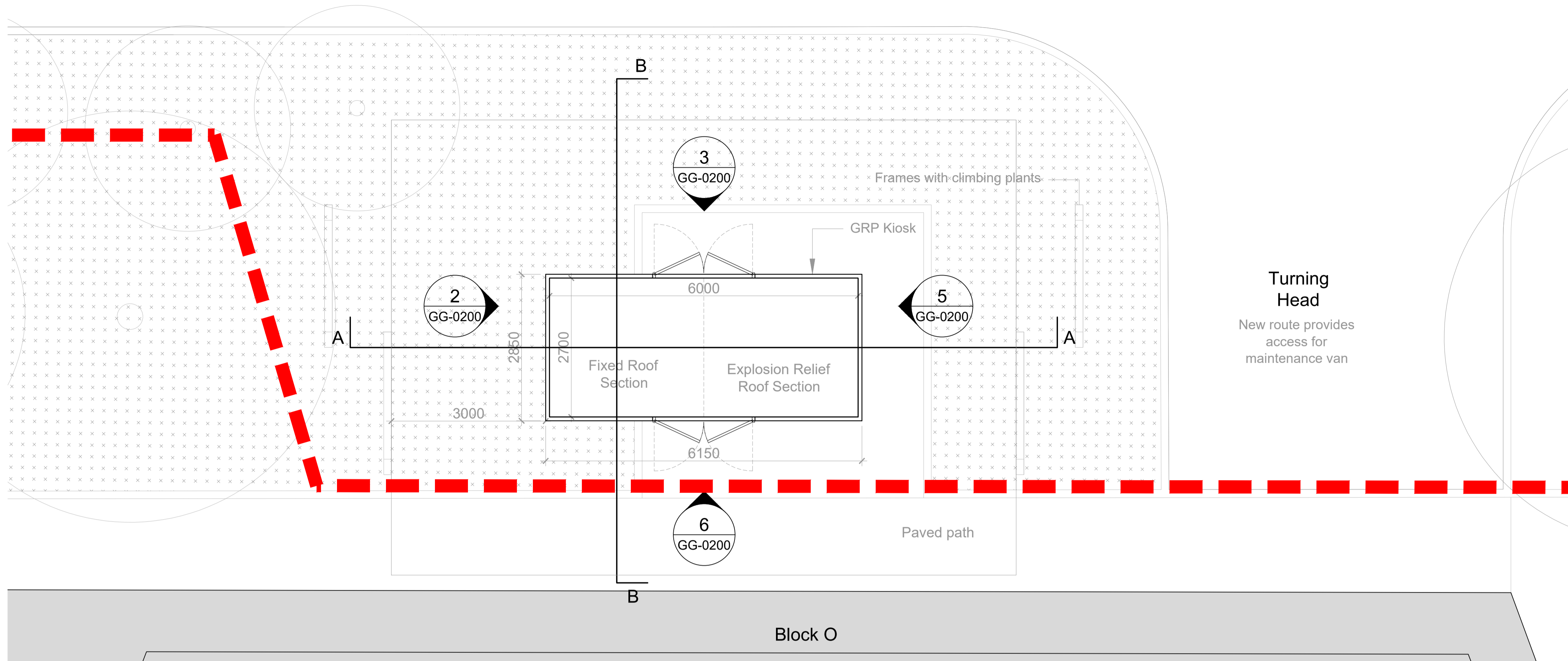
ENF-JSE-HTA-A-DR-EC-PL-0200
number - revision

LB Enfield
Joyce & Snell's Estate Regeneration

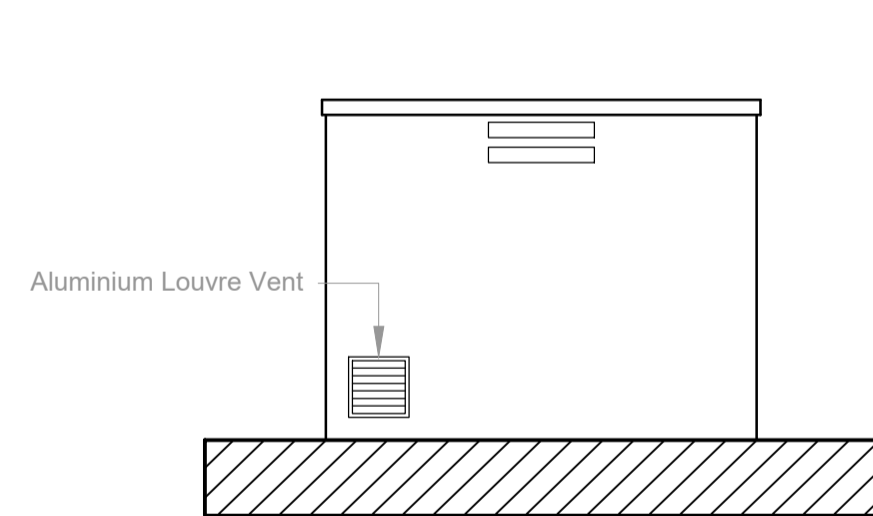
ENF-JSE job reference 1:100 @ A1 scale DRE drawn

0m 2m 4m 6m 8m 10m
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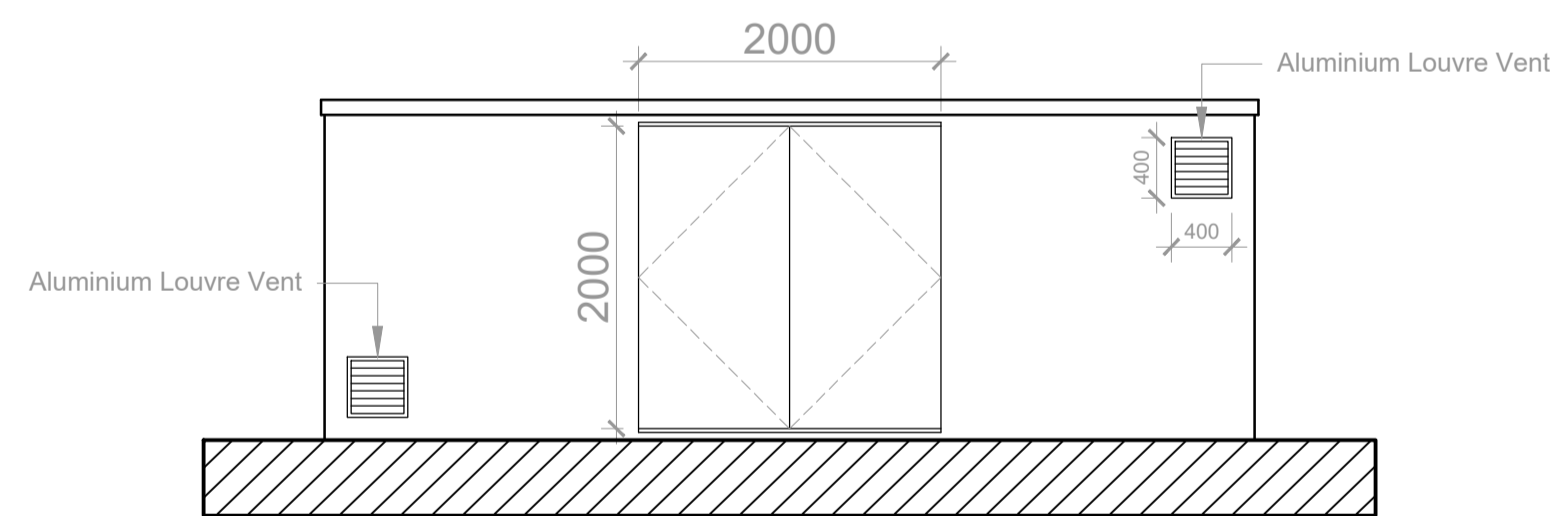
Service Road - Shared Surface



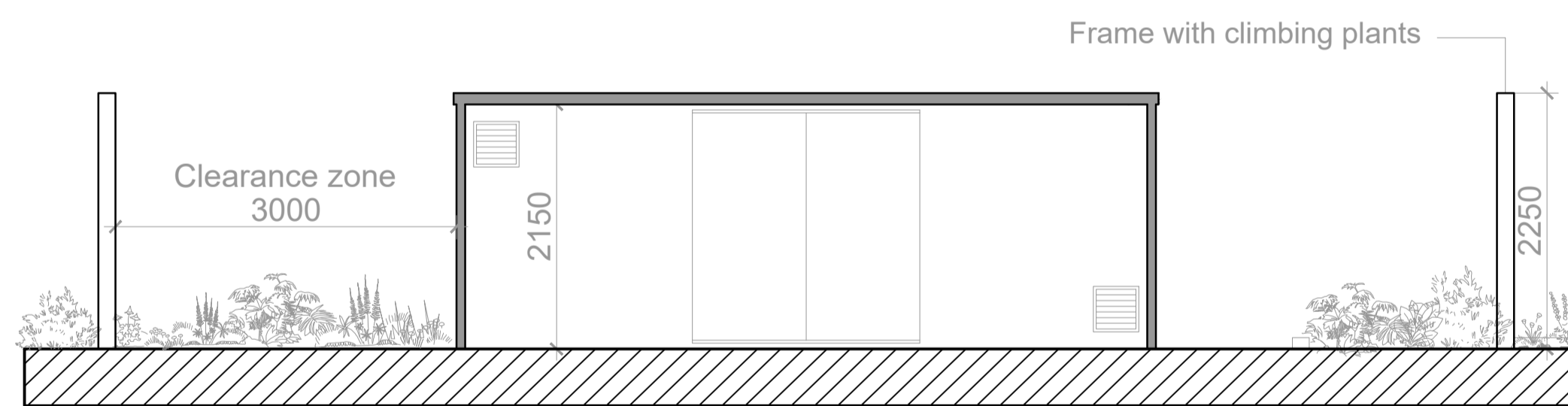
1 Floor Plan
1 : 50



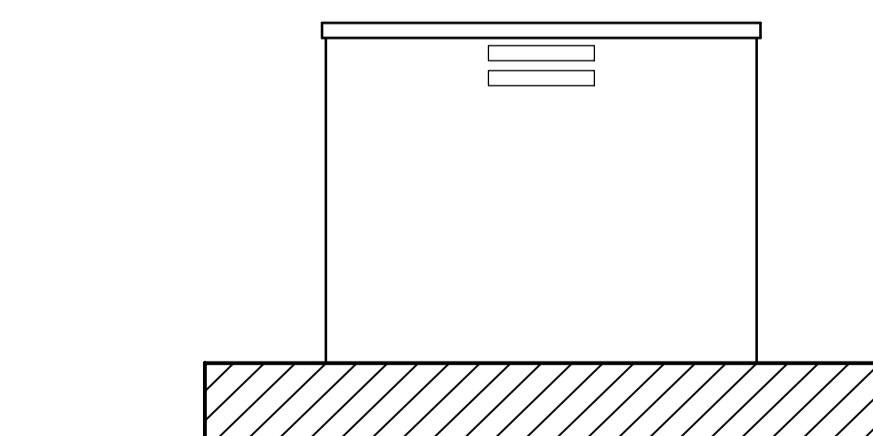
2 North-West Elevation
1 : 50



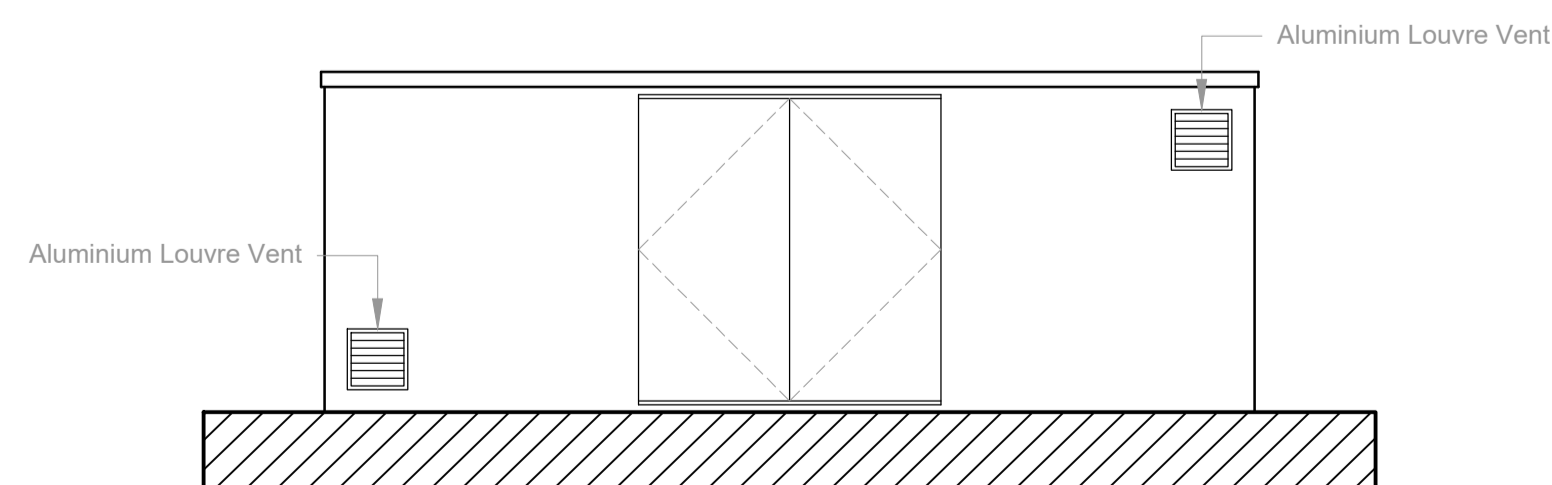
3 North-East (Front) Elevation
1 : 50



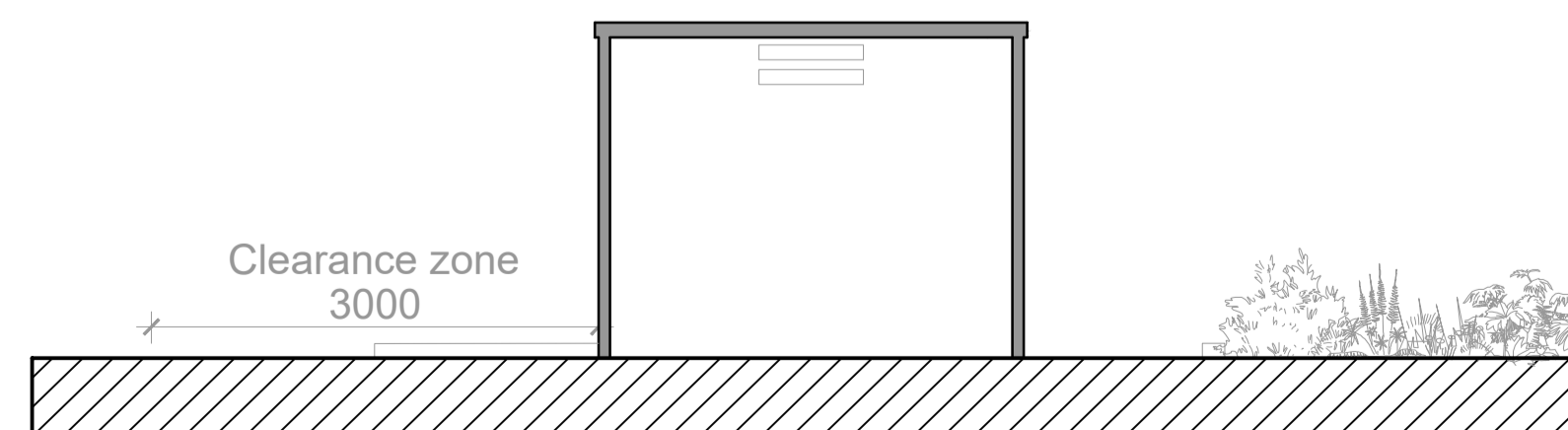
4 Section AA
1 : 50



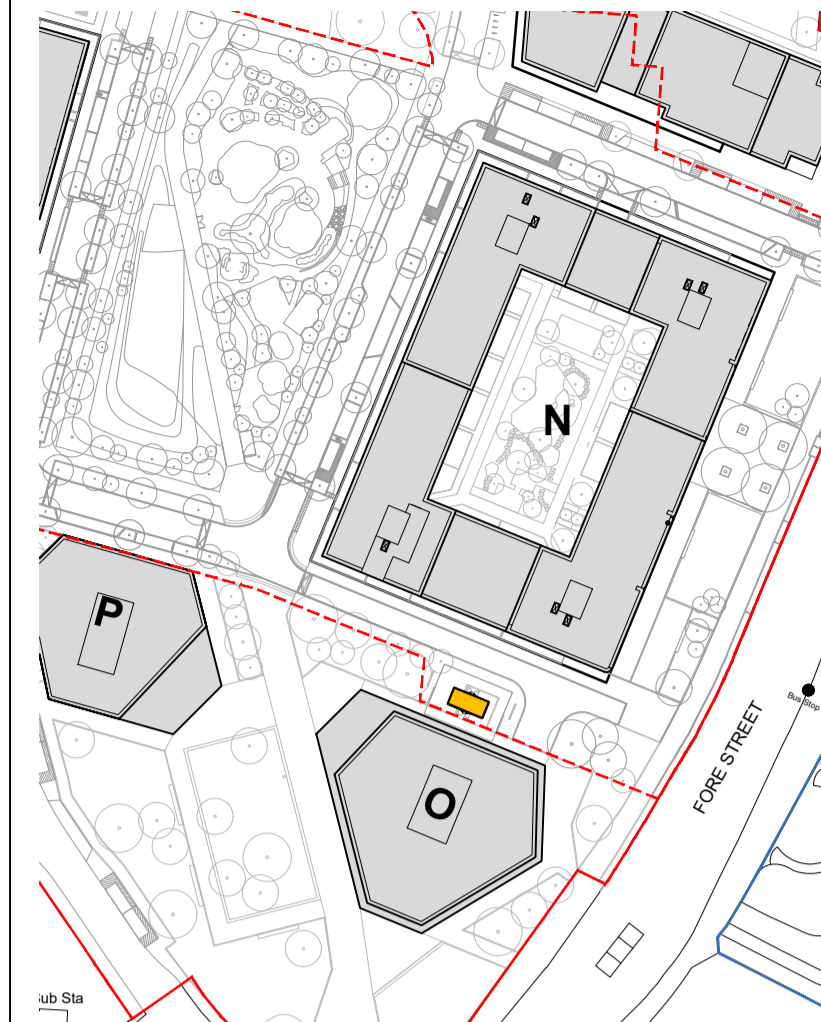
5 South-East Elevation
1 : 50



6 South-West (Rear) Elevation
1 : 50



7 Section BB
1 : 50



8 Site Location Plan
1 : 1250

LEGEND:
 Hybrid application site boundary
 Extent of development for detailed application
 Land within applicant ownership

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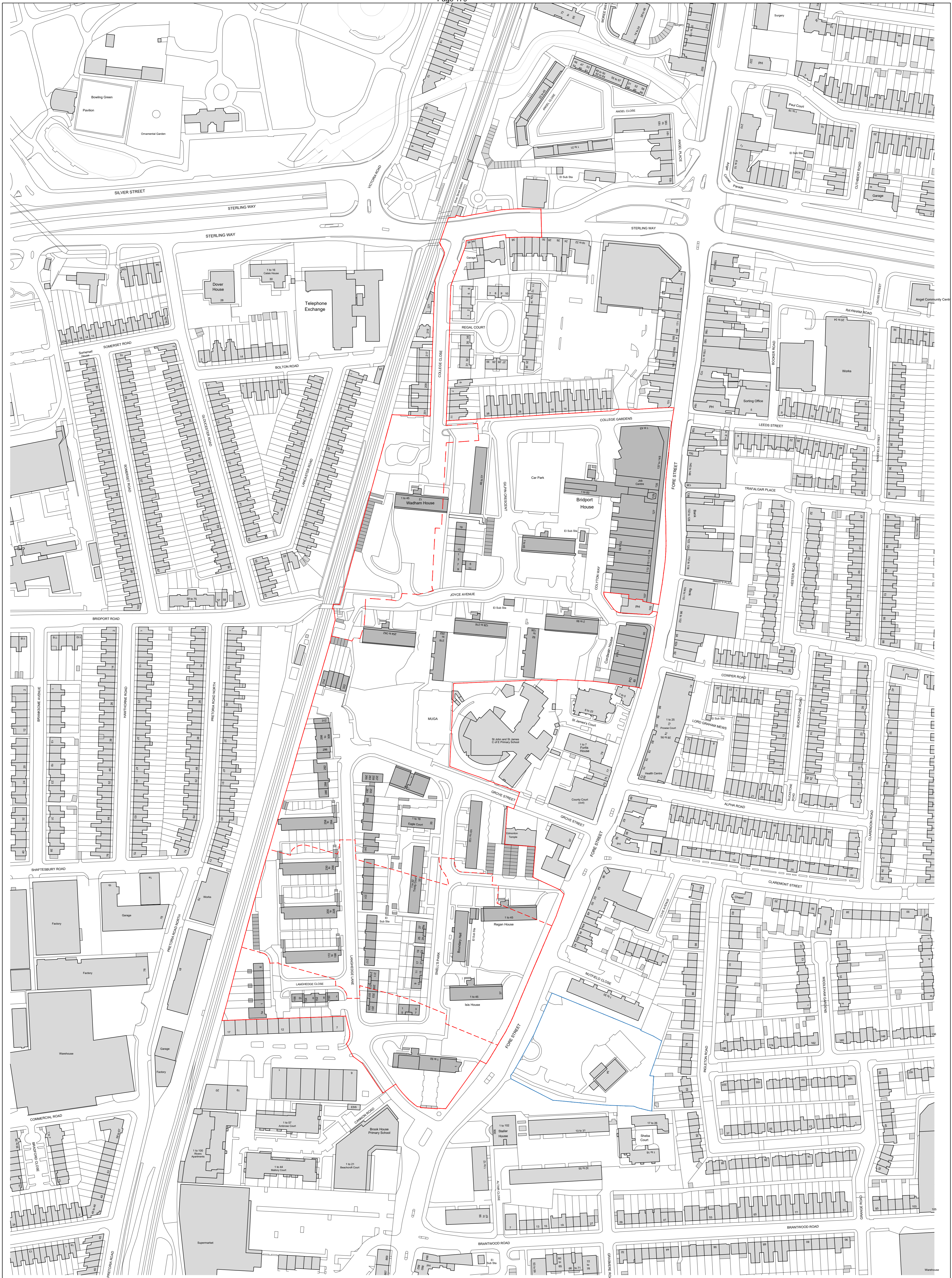
revision	date	drawn	description
-	19.05.23	RRO	Draft planning issue

Gas Governor
 Proposed Plans, Elevations and Sections
 Hybrid Masterplan
 ENF-JSE-HTA-A-DR-GG-PL-0201
 number revision

LB Enfield
 Joyce & Snells Estate Regeneration
 ENF-JSE
 job reference
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1:50 @ A1
 scale
 TCO
 drawn

0m 1m 2m 3m 4m 5m



Rev	Date	Drawn	Description
A	01.09.22	RRC	Initial Issue
B	29.09.22	AJK	Red line site boundary altered. Blue boundary added.
B	30.06.23	RRC	Legend updated

Notes:
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Legend	Description
	Hybrid application site boundary
	Extent of development for detailed application
	Land within applicant ownership within masterplan area

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Site Location Plan
 drawing title
Joyce & Snell's Estate Regeneration
 client / project

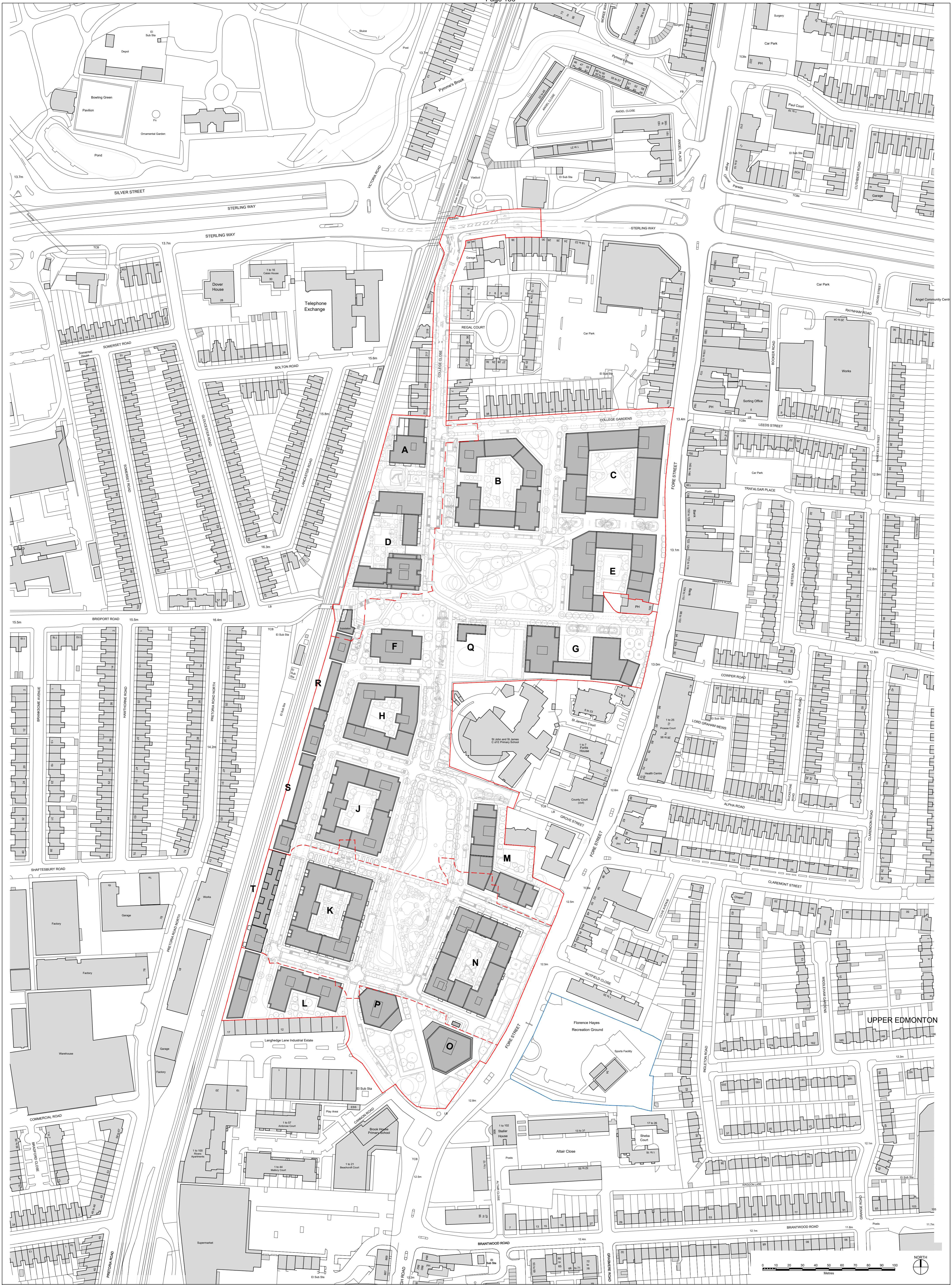
ENF-JSE-HTA-A-DR-XX-PL-0001
 drawing number
1:1250
 scale @ A1

B
 revision
ENF-JSE
 project number
RRO
 originated by

FOR PLANNING
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Rev	Date	Drawn	Description
-	28.09.22	RRO	Initial Issue
A	29.09.22	AJK	Red line site boundary altered. Blue boundary added.
B	15.12.22	RRO	Gas governor added
C	06.04.23	RRO	EIA Issue
D	19.05.23	RRO	Draft planning issue
E	06.06.23	RRO	Updated block K and on street parking
F	30.05.23	RRO	Planning issue
G	18.01.24	RRO	Design Freeze Issue
H	05.03.24	RRO	Draft planning issue
I	27.03.24	RRO	Planning issue
J	05.04.24	RRO	Planning issue

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Legend

- Hybrid application site boundary
- Extent of development for detailed application
- Land within applicant ownership within masterplan area

Illustrative Masterplan
 drawing title
LB Enfield
 Joyce & Snell's Estate Regeneration
 client's project

ENF-JSE-HTA-A-DR-XX-PL-0100
 drawing number

1:1250
 scale @ A1

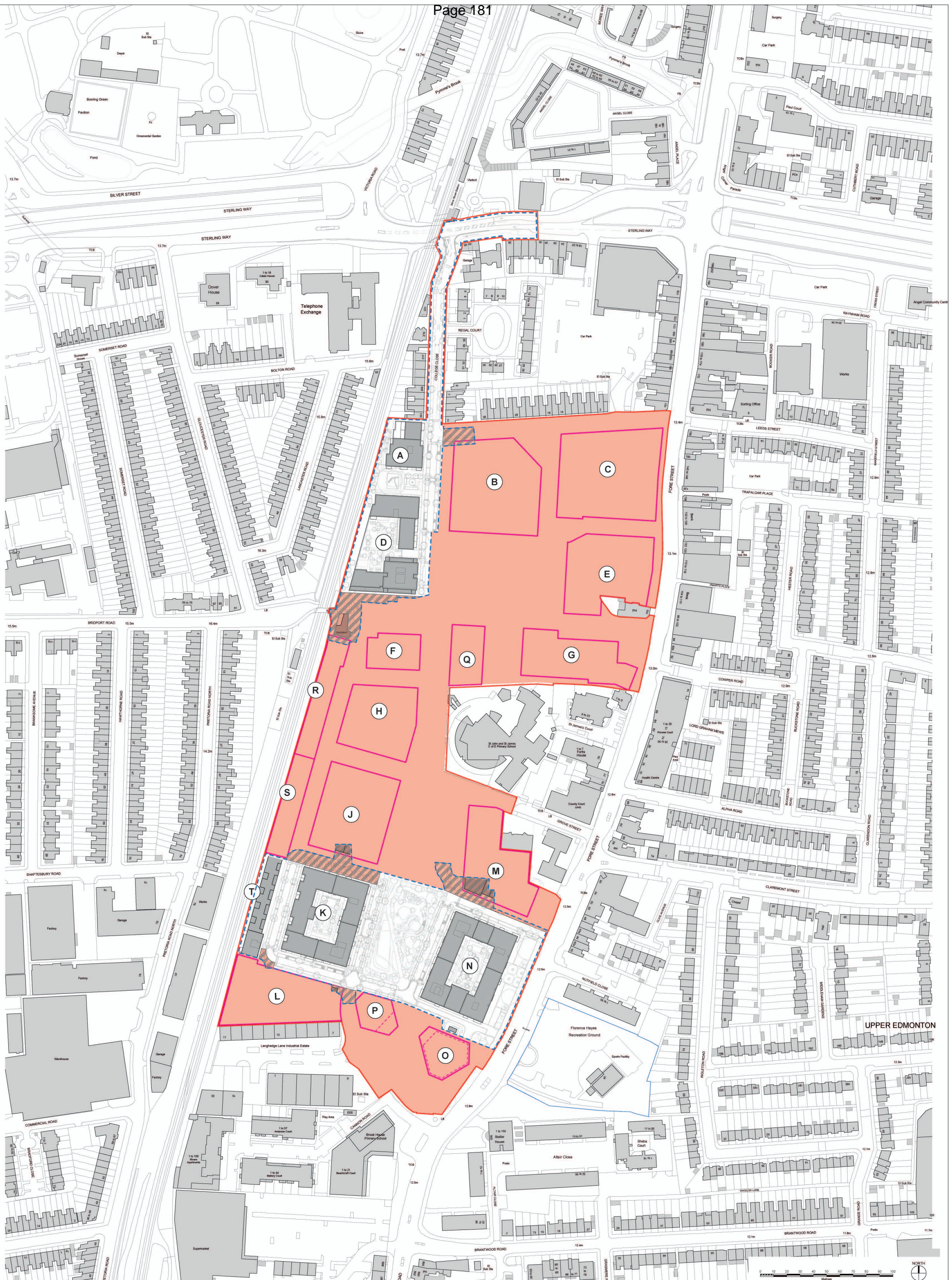
ENF-JSE
 project number

RRO
 originated by

DESIGN FREEZE
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Rev Date Drawn Description
 D 19.05.23 AJK Draft Planning Issue
 E 08.06.23 RRO Gas governor added and block K updated
 F 07.07.23 RRO Planning Issue
 G 18.01.24 RRO Design Freeze Issue
 H 01.03.24 RRO Draft Planning Issue
 I 05.04.24 RRO Planning Issue

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- Key**
- Hybrid Application - Outline Site Boundary
 - Hybrid Application - Detailed Site Boundary
 - Plot letters
 - Extent of temporary works within detailed application site boundary
 - Land within applicant ownership
 - Detailed Block footprints
 - Extent of Outline element of hybrid application
 - Extent of Plot Boundary

Parameter Plan: Extent of Outline within Hybrid Application
 drawing title

ENF-JSE-HTA-A-DR-XX-PL-PP01
 drawing number

LB Enfield
 client / project
 Joyce and Snell's Regeneration

1:2500
 scale @ A3

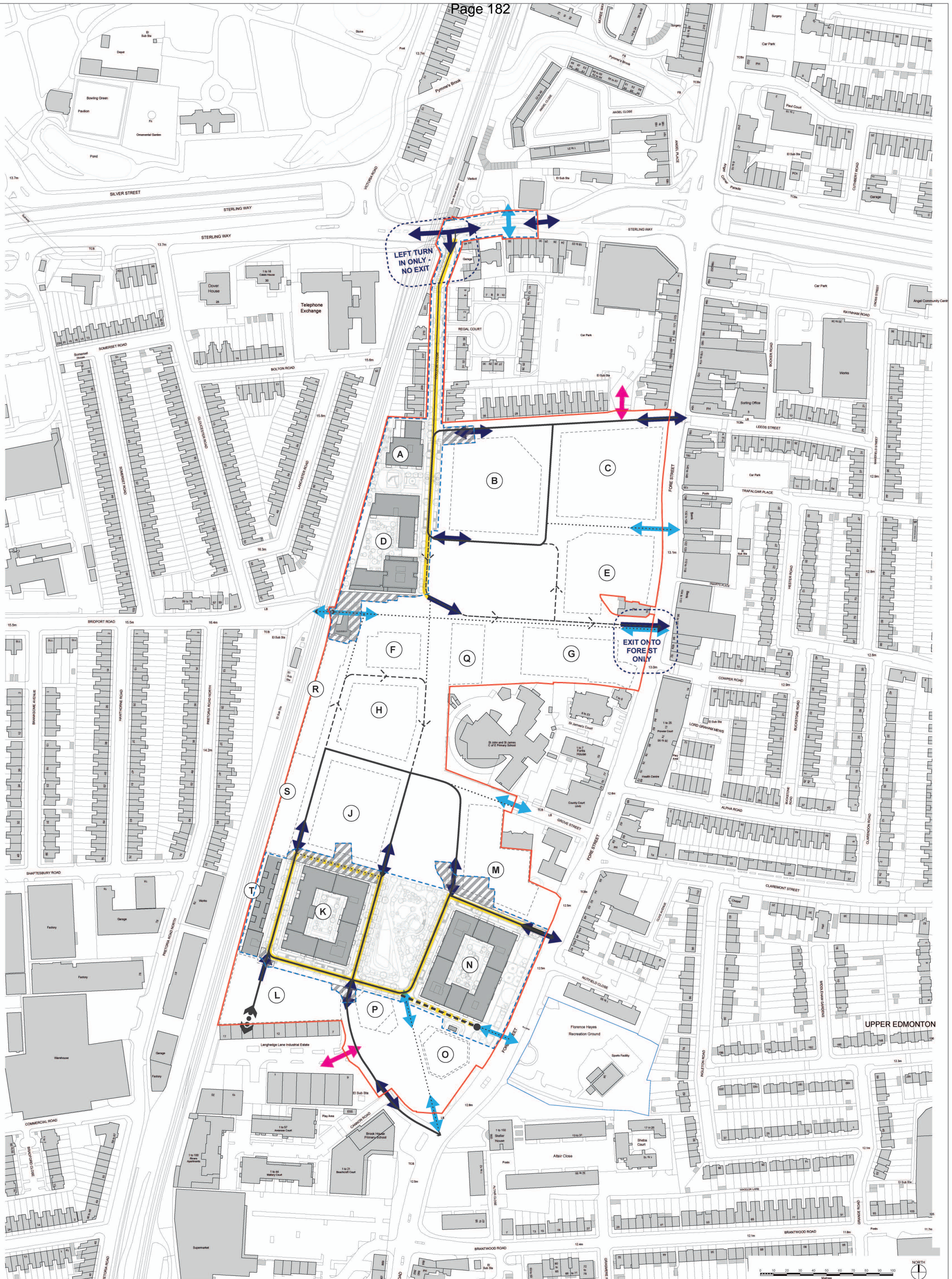
ENF-JSE
 project number

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Rev Date Drawn Description
 D 19.05.23 AJK Draft Planning Issue
 E 08.06.23 RRO Gas governor added and block K updated
 F 07.07.23 RRO Planning Issue
 G 18.01.24 RRO Design Freeze Issue
 H 01.03.24 RRO Draft Planning Issue
 I 05.04.24 RRO Planning Issue

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- Key**
- Hybrid Planning Application Site Boundary
 - Extent of Detailed element of hybrid application
 - Plot letters
 - Extent of Plot Boundary
 - Land within applicant ownership
 - Vehicular Site Access
 - Car Park Vehicular Site Access (Private)
 - Pedestrian / Cycle Site Access
 - Roads delivered within Detailed Element
 - Pedestrian routes delivered within Detailed Element
 - Proposed Key Pedestrian Routes
 - Extent of temporary works within detailed application site boundary
 - Proposed Vehicular Road Network
 - Proposed One-way Shared Surface Routes
 - Shared Surface - Service Road access only
 - ↔ Potential for future access

NOTE - Circulation shown indicatively to help understand site access. Please see PP03 for further circulation details.

Parameter Plan: Site Access
 drawing title

LB Enfield
 client / project
 Joyce and Snell's Regeneration

ENF-JSE-HTA-A-DR-XX-PL-PP02
 drawing number

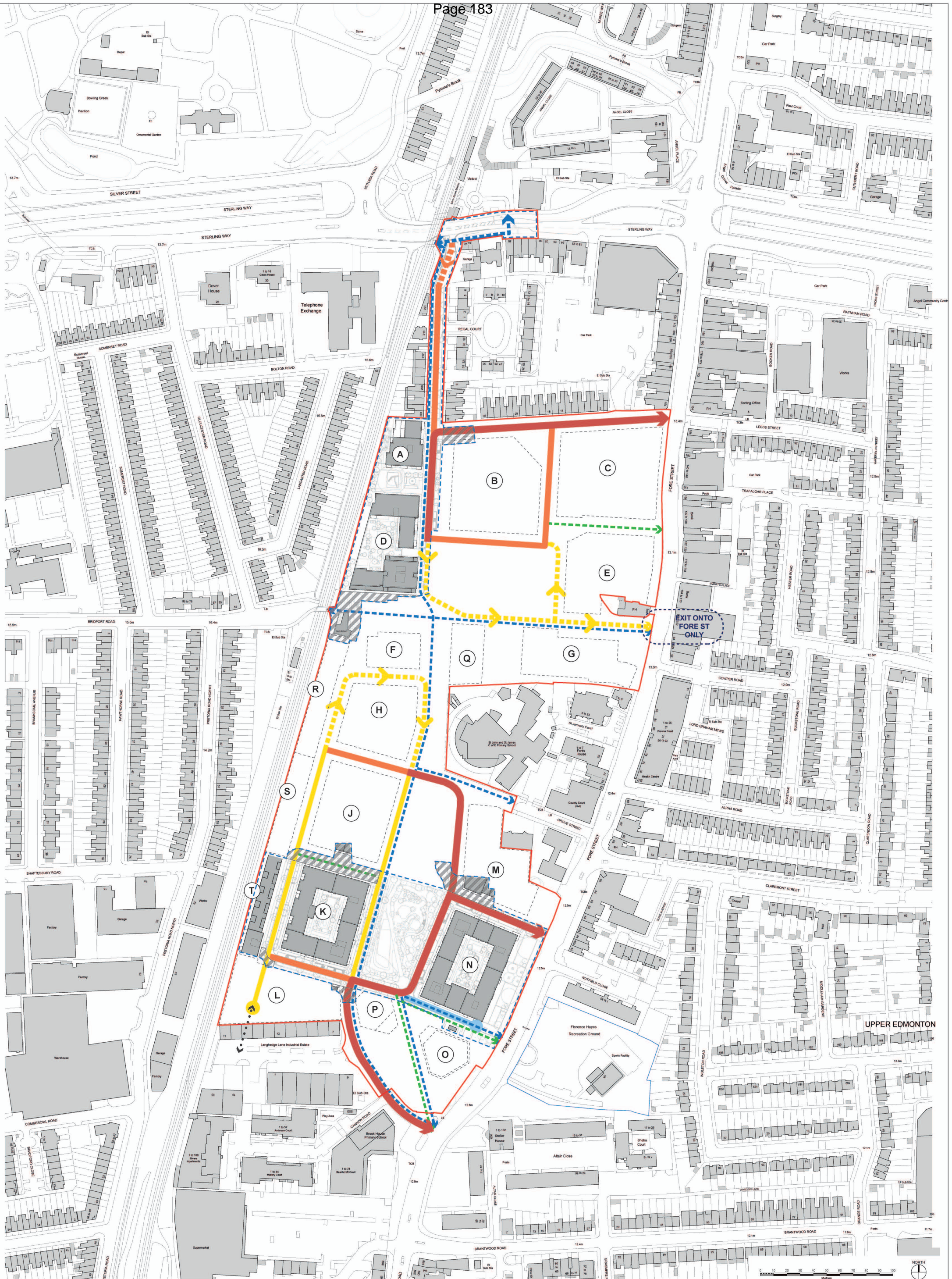
1:2500
 scale @ A3

ENF-JSE
 project number

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Rev Date Drawn Description
 D 19.05.23 AJK Draft Planning Issue
 E 08.06.23 RRO Gas governor added and block K updated
 F 07.07.23 RRO Planning Issue
 G 18.01.24 RRO Design Freeze Issue
 H 01.03.24 RRO Draft Planning Issue
 I 05.04.24 RRO Planning Issue

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Key	Description
	Hybrid Application - Outline Site Boundary
	Hybrid Application - Detailed Site Boundary
	Plot letters
	Extent of Plot Boundary
	Land within applicant ownership
	Primary Road
	Secondary Road
	Secondary Road - One Way Access
	Tertiary Road
	Tertiary Road - One Way Access
	Service Access Road
	Pedestrian / Cycle Route
	Pedestrian Only
	Potential for future access
	Extent of temporary works within detailed application site boundary

Parameter Plan: Circulation

drawing title
LB Enfield
Joyce and Snell's Regeneration

client / project
status

ENF-JSE-HTA-A-DR-XX-PL-PP03

drawing number
1:2500
scale @ A3

ENF-JSE
project number

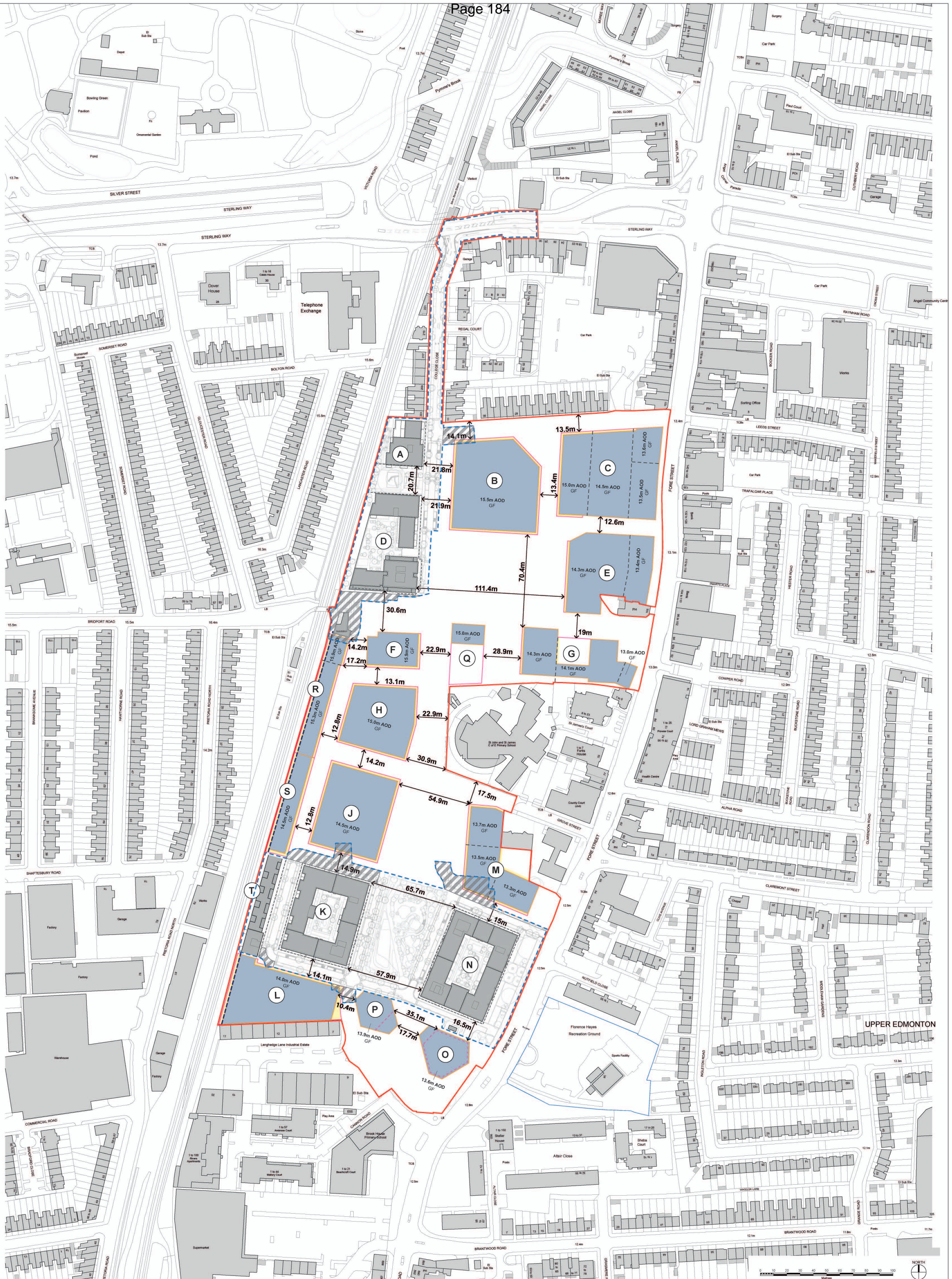
I

revision
AJK
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Rev	Date	Drawn	Description
E	19.05.23	AJK	Draft Planning Issue
F	08.06.23	RRO	Gas governor added and block K updated
H	18.01.24	RRO	Design Freeze Issue
G	07.07.23	RRO	Planning Issue
J	01.03.24	RRO	Draft Planning Issue
N	05.04.24	RRO	Planning Issue

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Key	Description
	Hybrid Planning Application Site Boundary
	Extent of Detailed element of hybrid application
	Plot letters
	Extent of Development Plot Boundary
	Extent of temporary works within detailed application site boundary
	Land within applicant ownership
	Extent of Maximum Building Line / Footprint
	Plot boundary offset area to be used for privacy strip / balconies only - MIN 1.5m
	Minimum threshold distances
	3m Network Rail offset - no build zone to the west
	Xm Site Level +AOD

Parameter Plan: Development Plot Boundaries
drawing title

ENF-JSE-HTA-A-DR-XX-PL-PP05
drawing number

J
revision

LB Enfield
client / project

Joyce and Snell's Regeneration

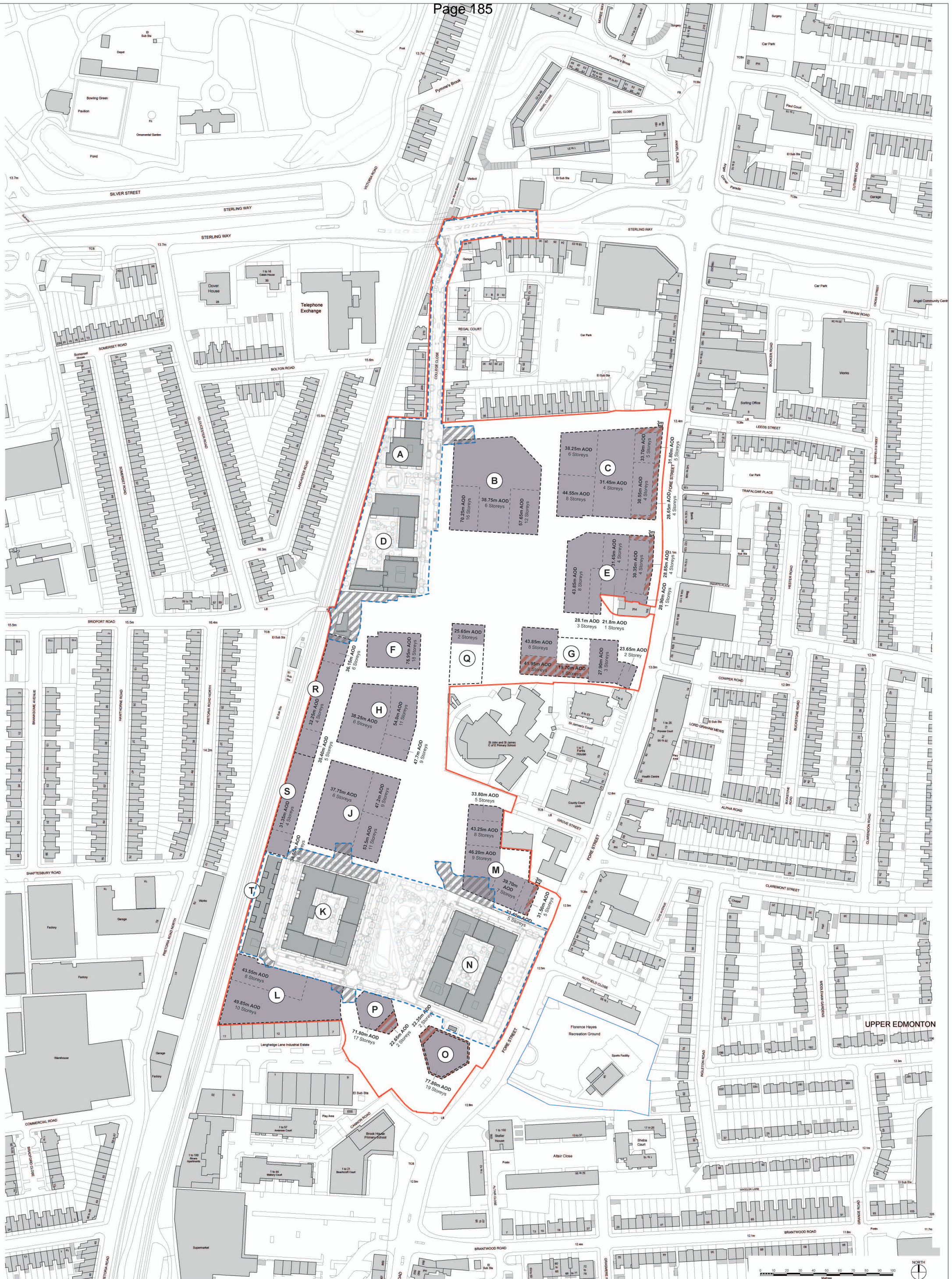
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scale @ A3

ENF-JSE
project number

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Rev	Date	Drawn	Description
E	19.05.23	AJK	Draft Planning Issue
F	08.06.23	AJK	Gas governor added and block K updated
H	18.01.24	RRO	Design Freeze Issue
G	07.07.23	RRO	Planning Issue
I	01.03.24	RRO	Draft Planning Issue
J	05.04.24	RRO	Planning Issue

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- Key**
- Hybrid Planning Application Site Boundary
 - Extent of Detailed element of hybrid application
 - Plot letters
 - Extent of Plot Boundary
 - Plot with AOD height and illustrative storeys
 - Land within applicant ownership

All maximum heights include a 3m tolerance zone for overruns / plant / parapets / equipment etc
SEE DESIGN CODE

Overruns

- 0.3m Overrun
- Parapet 1.5m
- Top of Storey height

Plant Exclusion

- Extent of plant exclusion zone
- Extent of temporary works within detailed application site boundary

There is a 'no build zone' on blocks where no plant or overruns can be placed

Overruns

- 0.3m Overrun
- Parapet 1.5m
- Top of Storey height

Parameter Plan: Maximum Heights
drawing title

LB Enfield
client / project
Joyce and Snell's Regeneration

FOR PLANNING
status

ENF-JSE-HTA-A-DR-XX-PL-PP06
drawing number

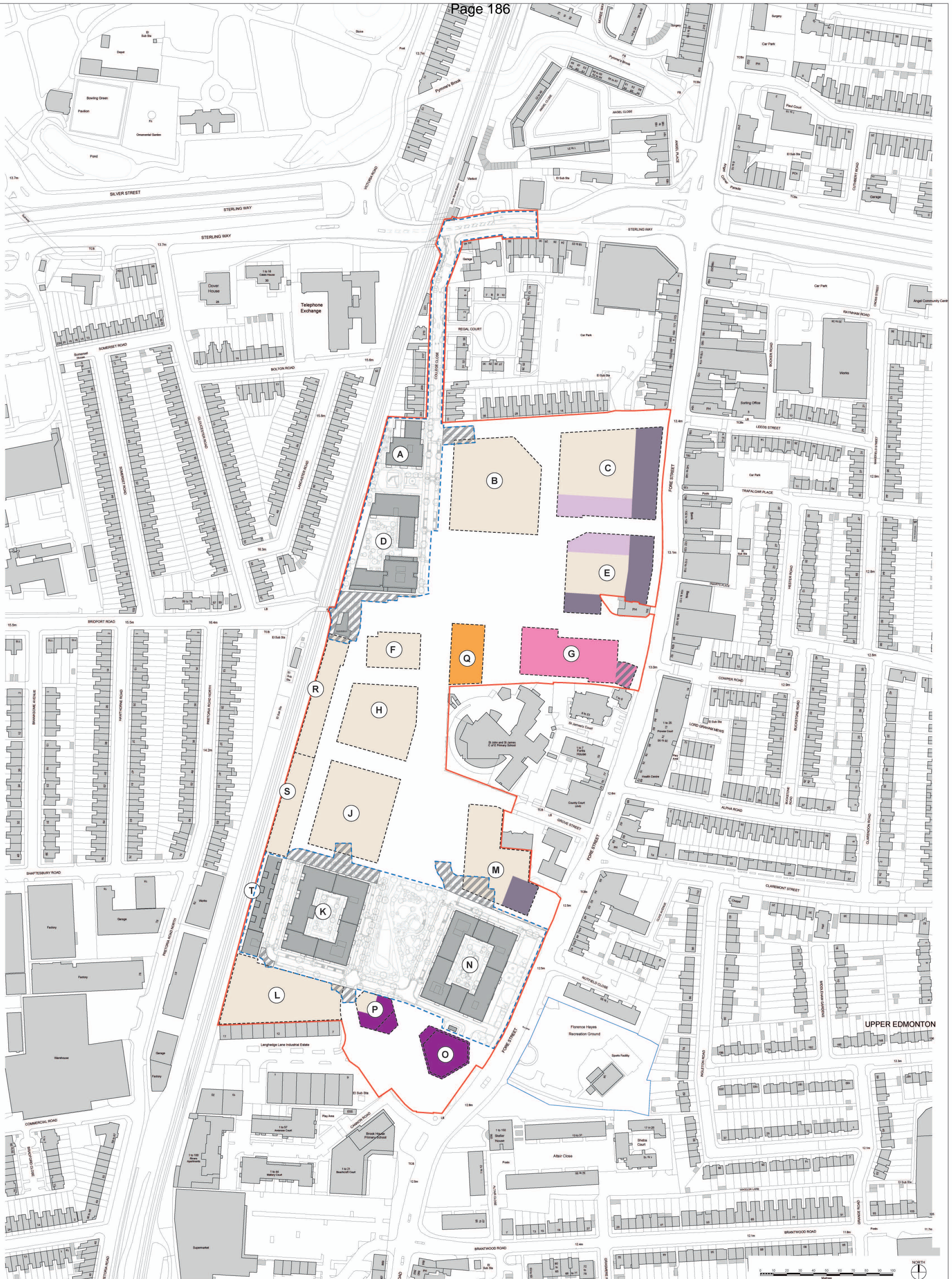
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scale @ A3

ENF-JSE
project number

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Rev	Date	Drawn	Description
E	19.05.23	AJK	Draft Planning Issue
F	08.06.23	RRO	Gas governor added and block K updated
H	18.01.24	RRO	Design Freeze Issue
G	07.07.23	RRO	Planning Issue
I	01.03.24	RRO	Draft Planning Issue
J	05.04.24	RRO	Planning Issue

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Key	Description
	Hybrid Planning Application Site Boundary
	Extent of Detailed element of hybrid application
	Plot letters
	Extent of Plot Boundary
	Extent of temporary works within detailed application site boundary
	Land within applicant ownership
	C3 - Residential
	E (a-e) (and ancillary C3 uses - no accommodation)
	E (a-b) / Sui Generis (p-q) (and ancillary C3 uses - no accommodation)
	E (g)
	E (f)
	F.1 (a-e) and F.2 (a-b)
	F.1 (a-e) and F.2 (a-b) ORE (a-b)

NOTE: Depths of non-residential land uses are indicative only and will include provision for residential cores

Parameter Plan: Land Uses - Ground Floor ENF-JSE-HTA-A-DR-XX-PL-PP07 J
drawing title drawing number revision

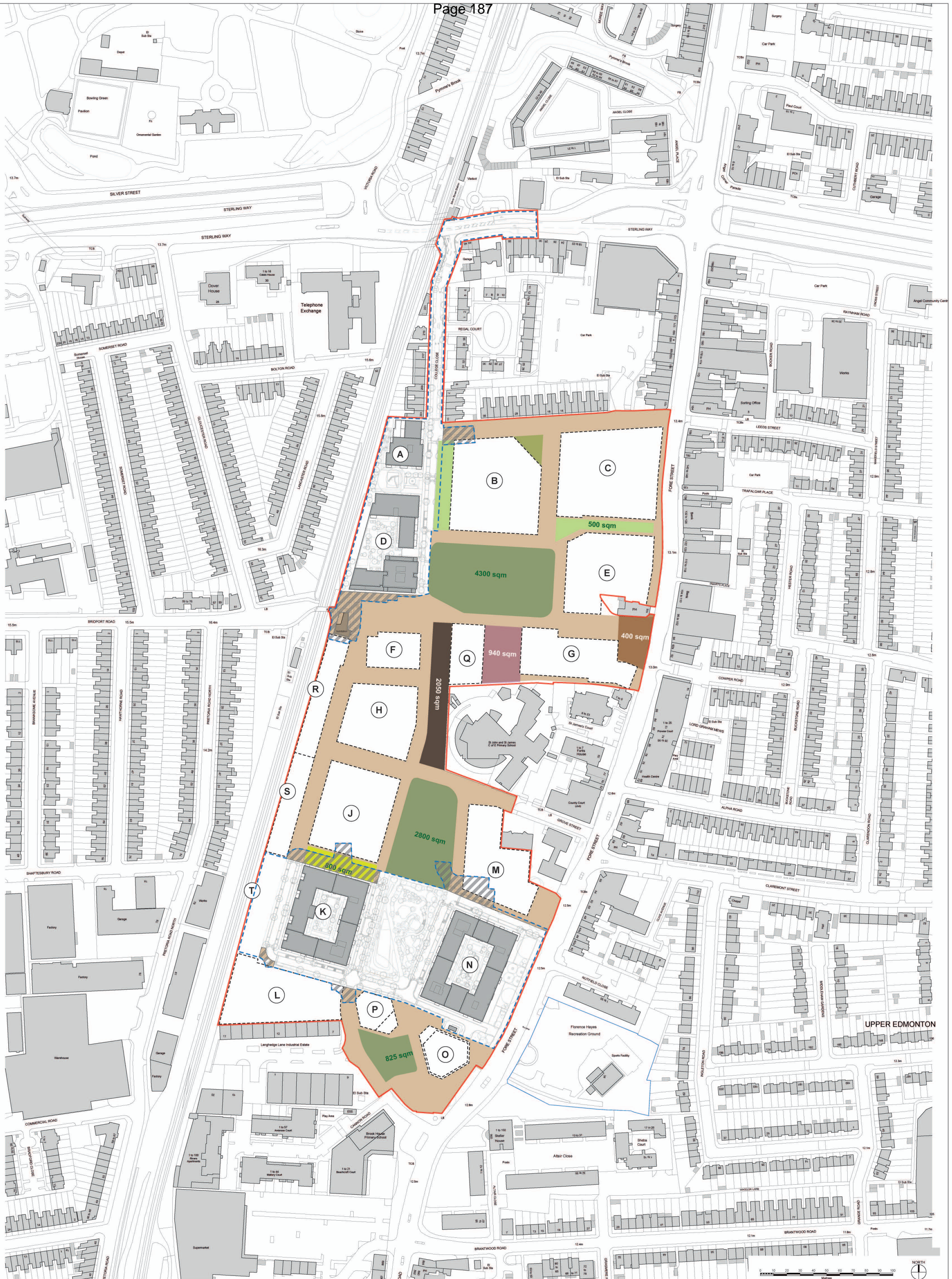
LB Enfield
client / project Joyce and Snell's Regeneration ENF-JSE AJK
project number originated by

1:2500
scale @ A3

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Rev Date Drawn Description
 D 19.05.23 AJK Draft Planning Issue
 E 08.06.23 RRO Gas governor added and block K updated
 F 07.07.23 RRO Planning Issue
 G 18.01.24 RRO Design Freeze Issue
 H 01.03.24 RRO Draft Planning Issue
 I 05.04.24 RRO Planning Issue

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- Key**
- Hybrid Planning Application Site Boundary
 - Extent of Detailed element of hybrid application
 - Plot letters
 - Extent of Plot Boundary
 - Extent of temporary works within detailed application site boundary
 - Land within applicant ownership
 - Minimum extent of public realm
 - Minimum extent of civic square
 - Minimum extent of school square
 - Minimum extent of park space
 - Minimum extent of community garden space
 - Minimum extent of general open space
 - Minimum extent of MUGA

Parameter Plan: Open Space and Public Realm
 drawing title

ENF-JSE-HTA-A-DR-XX-PL-PP09
 drawing number

LB Enfield
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1:2500
 scale @ A3

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 project number

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LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE	Date: 16th July 2024	
Report of Head of Planning & Building Control – Karen Page	Contact Officers: Tendai Mutasa- Case Officer Sharon Davidson- Planning Decisions Manager	Category Minor
Ward Town	Councillor Request No	
LOCATION: 24 - 26 Churchbury Lane, Enfield, EN1 3TY		
APPLICATION NUMBER: 22/02248/FUL		
PROPOSAL: Demolition of the existing buildings providing supported living accommodation and erection of a detached 2-storey building with additional accommodation in the roof area, to provide 4 clusters of accommodation including 2 x 1-person self-contained units with associated office space for support staff, 5 individual bedrooms with ensuite facilities and shared facilities and 12 x 1 person self-contained units with additional and ancillary shared living accommodation and office space for support staff, all for residents receiving care (19 persons) (Class use Sui Generis) and provision of associated car parking, cycle parking and refuse/recycle storage.(Amended Description).		
Applicant Name & Address: Mr Paul Buxton 163 Church Hill Road East Barnet EN4 8PQ	Agent Name & Address: Mr Joe Henry 163 Church Hill Road East Barnet EN4 8PQ	
Recommendation: That, following the decision to defer consideration of this application at the Planning Committee meeting of 4 th June 2024 to enable officers to draft reasons for refusal reflecting concerns raised concerning overlooking and privacy and quality of accommodation and internal layout and amenity space provision, that Members confirm agreement to the reasons for refusal set out in the report.		

Ref: 22/02248/FUL LOCATION: 24 - 26 Churchbury Lane, Enfield, EN1 3TY,



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Scale 1:1250

North



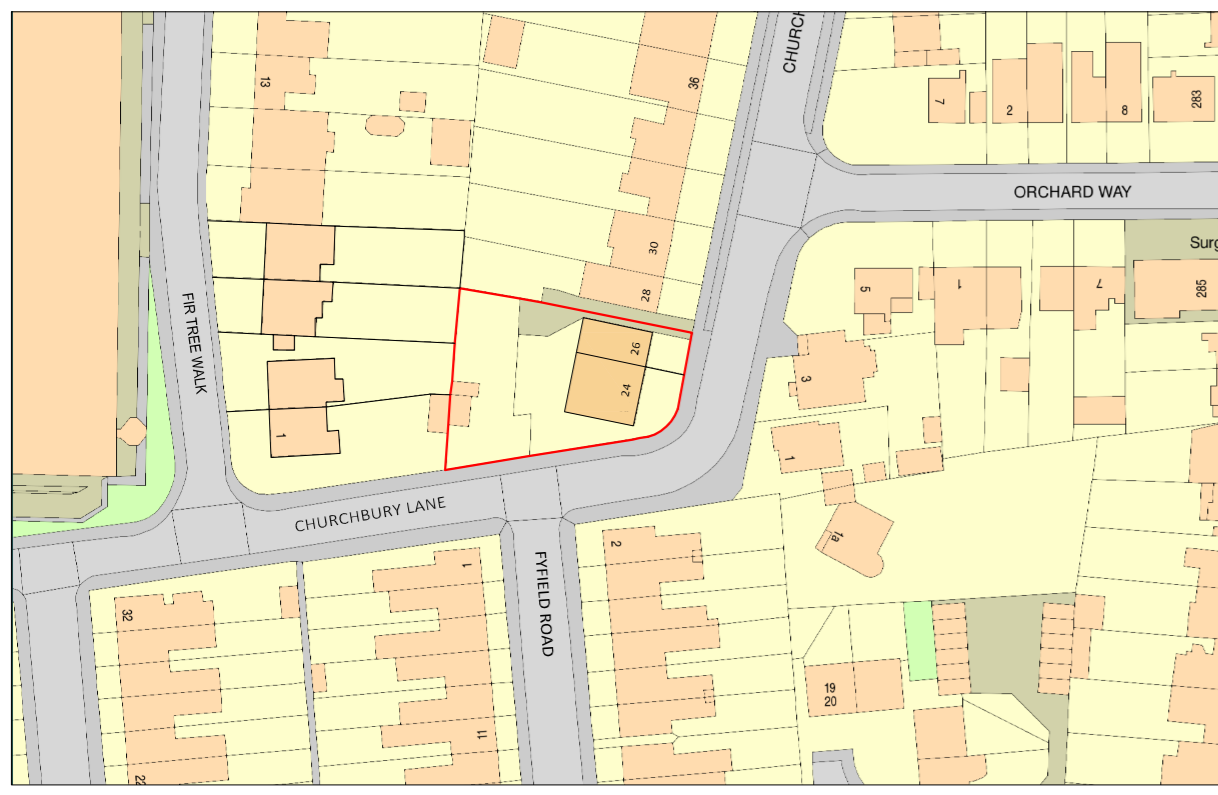
1 Note for Members

- 1.1 This application was reported to Planning Committee on 4th June 2024 with an officer recommendation to grant planning permission subject to conditions. Following extensive discussion, Members considered that the Planning Inspector's concerns as set out in the appeal decision linked to planning application reference 20/02821/FUL for a similar form of development, had not been sufficiently addressed and that a decision on the application be deferred for officers to prepare reasons for refusal in respect of (a) overlooking and privacy; and (b) quality of accommodation and internal layout and amenity space provision. In light of this resolution officers have drafted reasons for refusal and these are now set out below

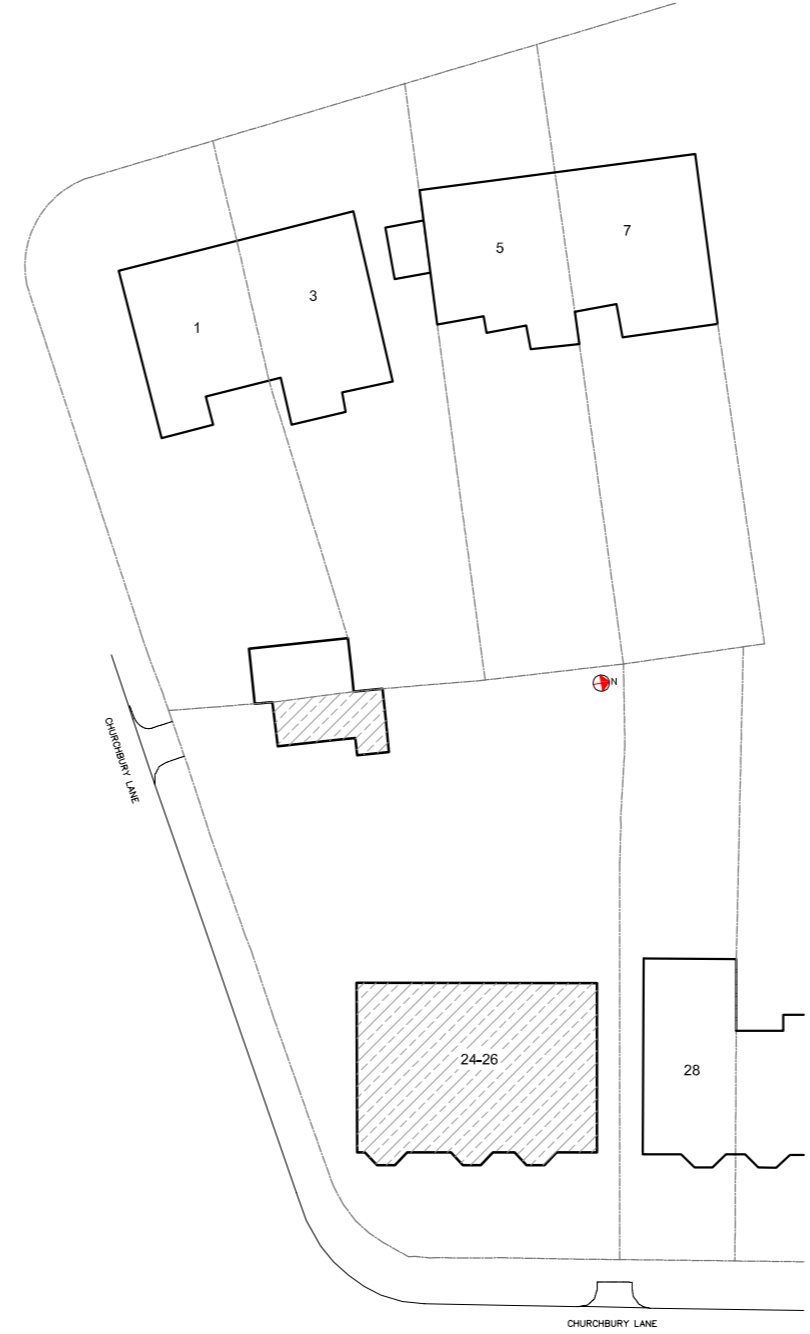
2 Recommendation :

- 2.1 That Members confirm that planning permission should be refused for the following reasons:
1. The proposed development, by virtue of the quality and quantity of internal and external space, poor quality of outlook, and insufficient provision of and poor access to private/communal amenity space would result in substandard accommodation and be harmful to the amenities of future occupiers, contrary to Policy D6 of the London Plan (2021), Policies CP4 and CP30 of the Enfield Core Strategy (2010), Policies DMD6, DMD8 and DMD9 of the Enfield Development Management Document (2014), which seek amongst other things to ensure that development delivers housing development of high quality, which meets the required standards for quality and quantity of internal and external space.
 2. The provision of 9 side facing windows in the side elevation of the proposed block, in close proximity to No.28 Churchbury Lane, taken with the increased intensity of use on the premises compared to the building it replaces, would give rise to an unacceptable loss of privacy and perceived loss of privacy to the occupiers of No.28, detrimental to their amenities and contrary to Policies D3 and D6 of the London Plan (2021), Policies CP4 and CP30 of the Enfield Core Strategy (2010) and Policies DMD8 and DMD10 of the Enfield Development Management Document (2014), which seek amongst other things to ensure development provides appropriate living conditions, standards and privacy .

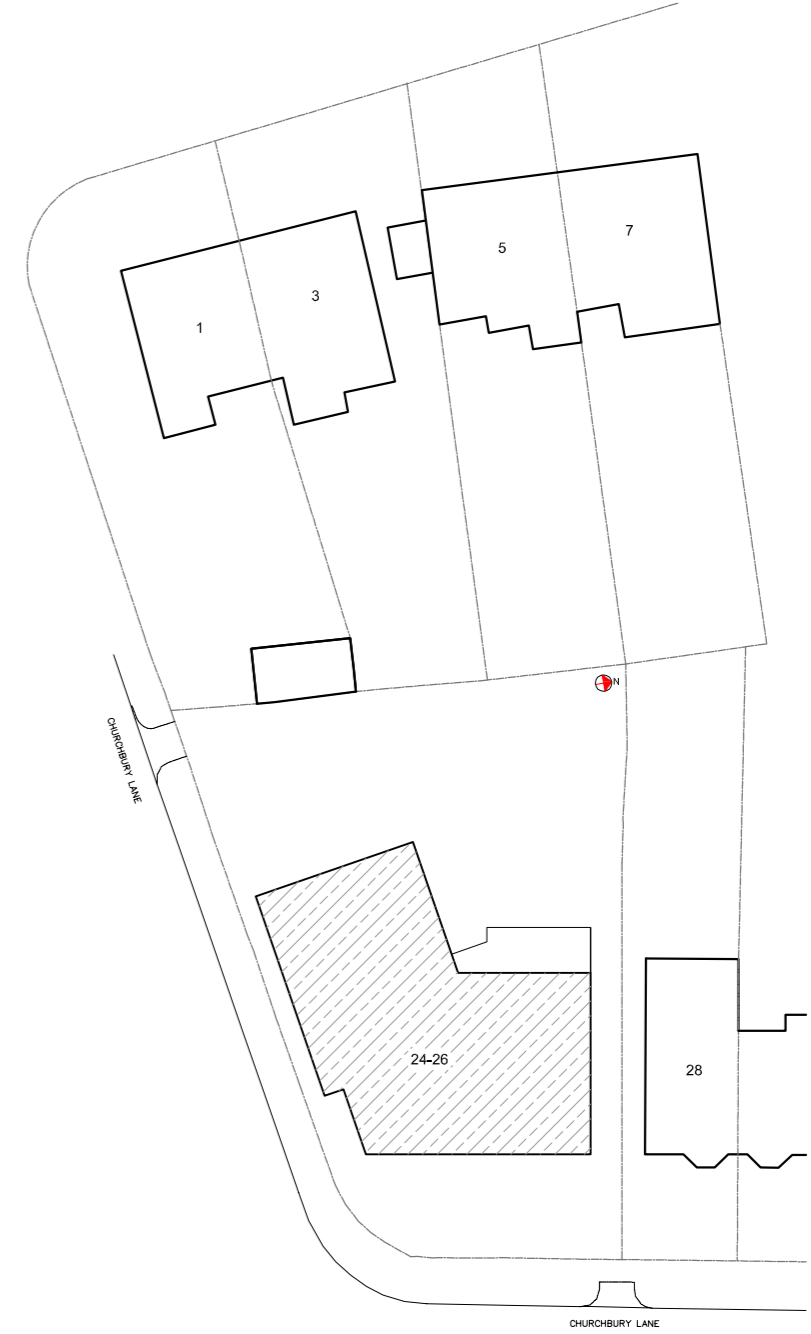
Existing Photographs of Site



Existing Site Location Plan
Scale 1:1250

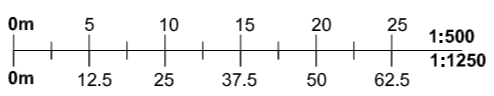


Existing Site Plan
(Scale 1:500)



Proposed Site Plan
(Scale 1:500)

Notes
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9 Louisa Street London E1 4NF
m: 078687 15430 e-mail: andreas73@me.com

Rev: _____ Date: _____ Drawing Status: _____
Planning Application

Project: 24 - 26 Churchbury Lane Enfield
EN1

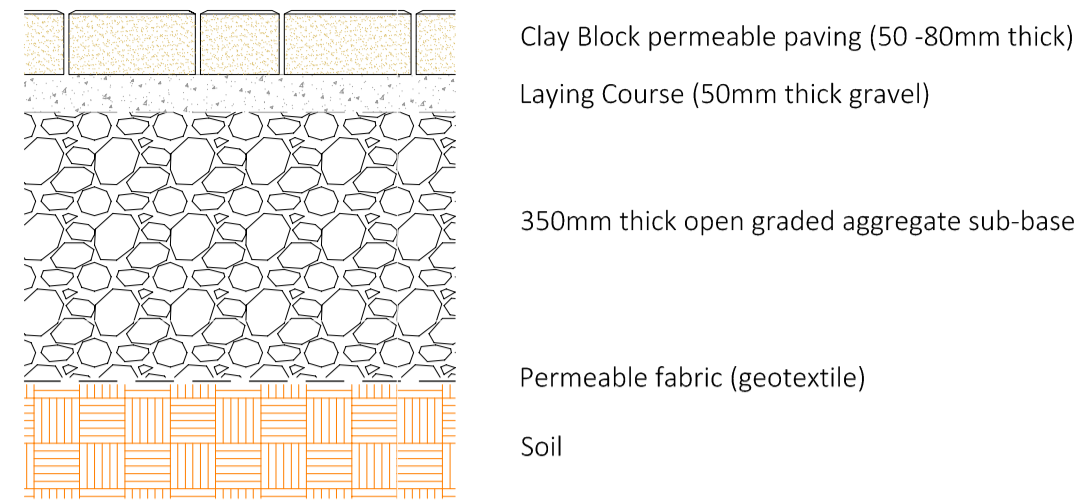
Project Description: Proposed Works

Drawing Name: Existing Site Location Plan, Photos + Site Plans

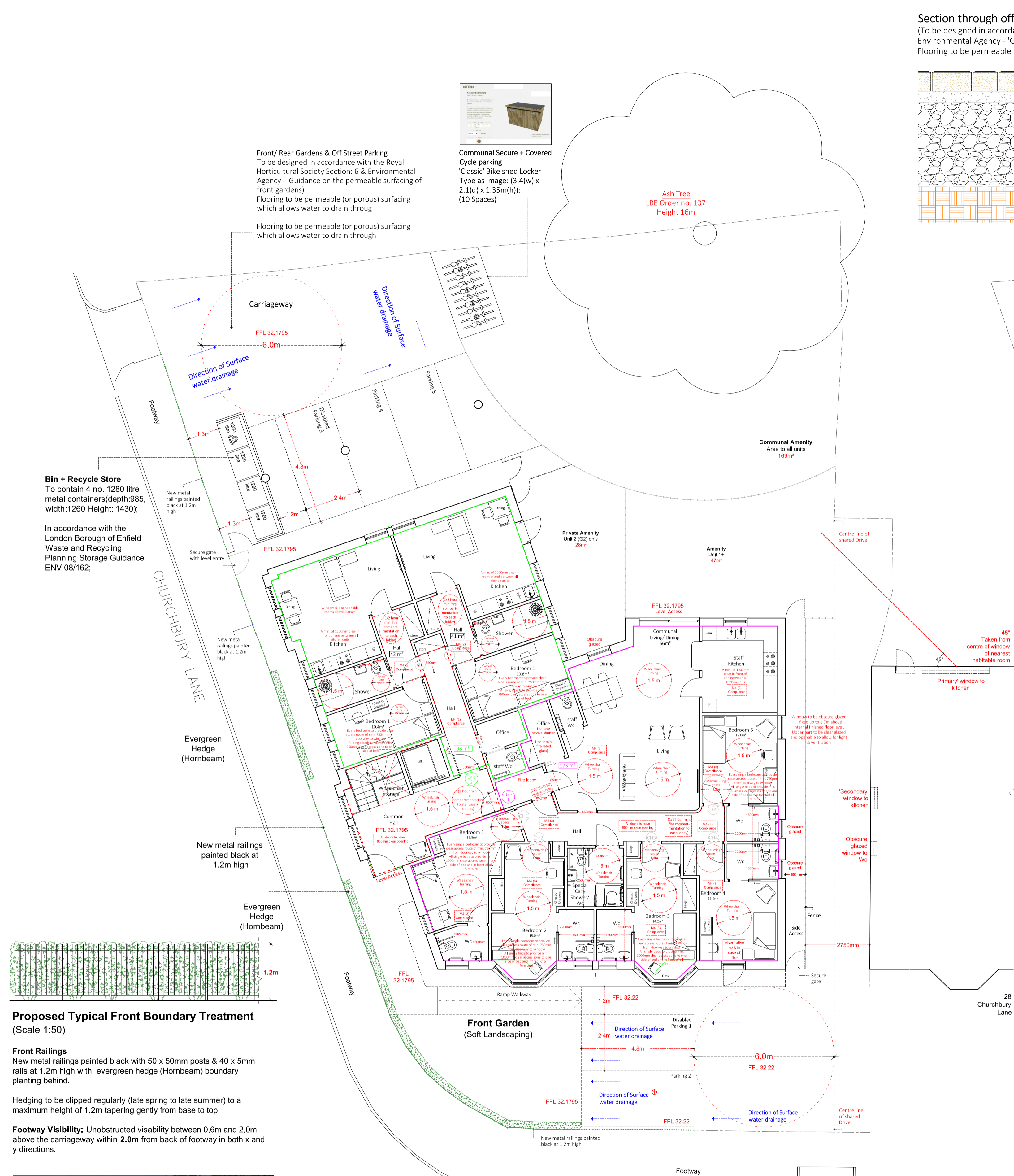
Date: 19.07.19
Scale: 1:1250 + 1:500 @ A2

Drw. No.: Chu/19/P/01
Rev: _____

Section through off street parking area (scale 1:10)
 (To be designed in accordance with the Royal Horticultural Society Section: 6 & Environmental Agency - 'Guidance on the permeable surfacing of front gardens')
 Flooring to be permeable (or porous) surfacing which allows water to drain through



Site area = 941 m ²				Unit	m ²
Existing	169	131	300 m ²	Unit 1	173
Proposed	296	317	293	Unit 2	98
				Unit 3	301
				Unit 4	279
			906 m² (+ 606 m²/ 302%)	Total	851 m²



Proposed Ground Floor Plan



Proposed First Floor Plan

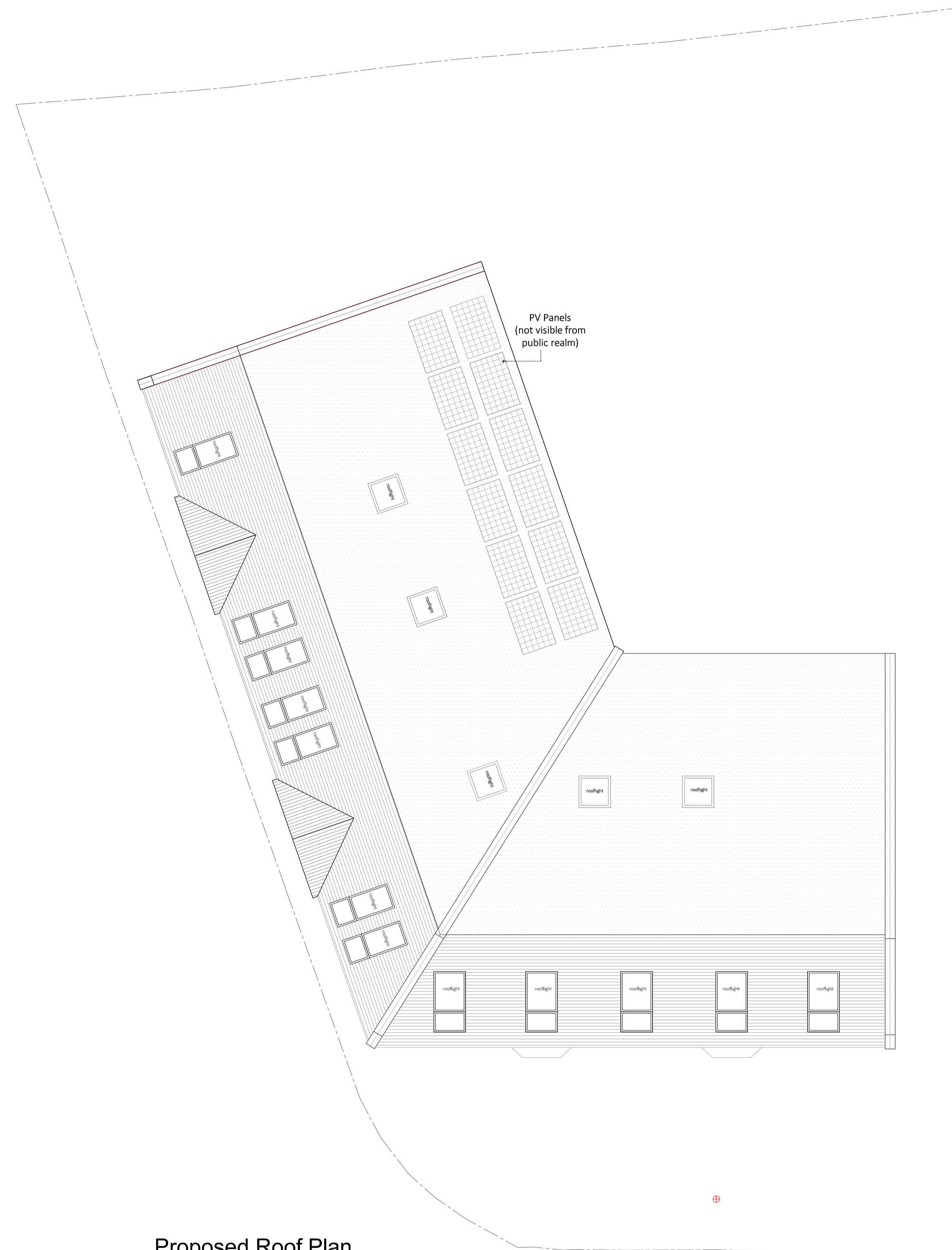


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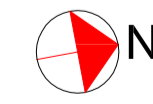
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0m	12.5	25	37.5	50	62.5	1:1250



Proposed Second Floor Plan

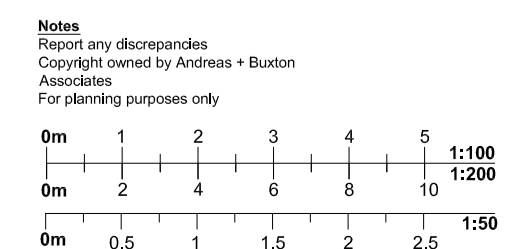


Proposed Roof Plan



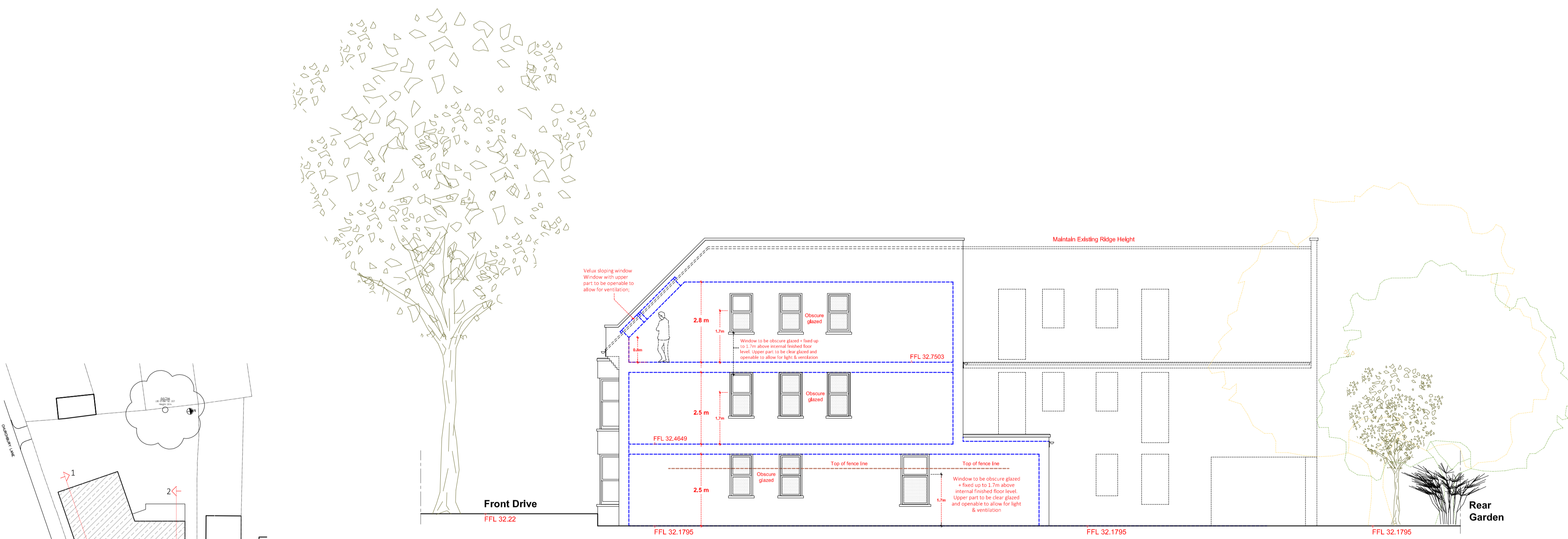
Site area = 941 m ²				
	Ground	First	Second	Total
Existing	169	131		300 m ²
Proposed	296	317	293	906 m ² (+ 606 m ² / 302%)
				Total 851 m²

Unit	m ²
Unit 1	173
Unit 2	98
Unit 3	301
Unit 4	279

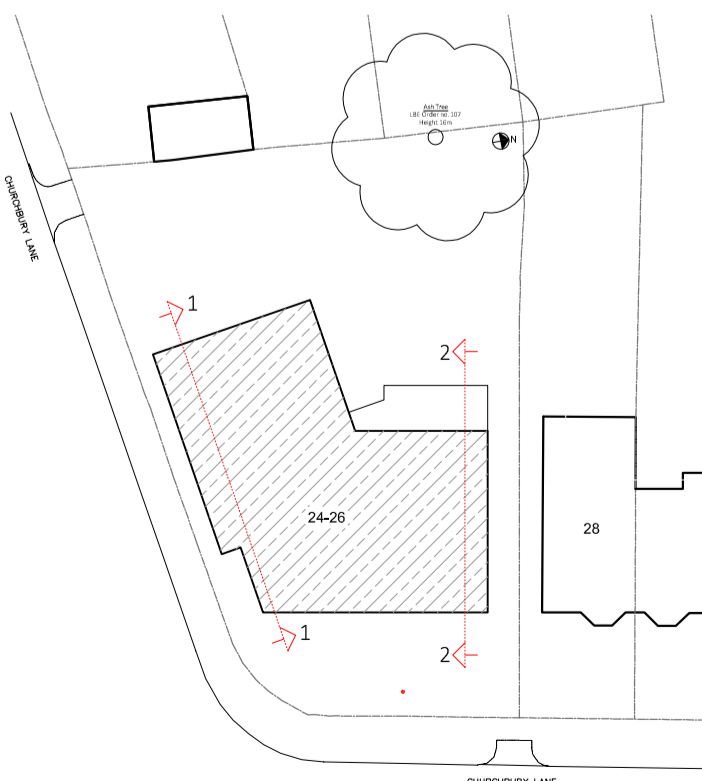




Proposed Front Elevation/ Section : South (1)
(Scale 1:100)



Proposed Side Elevation/ Section: North (2)
(Scale 1:100)



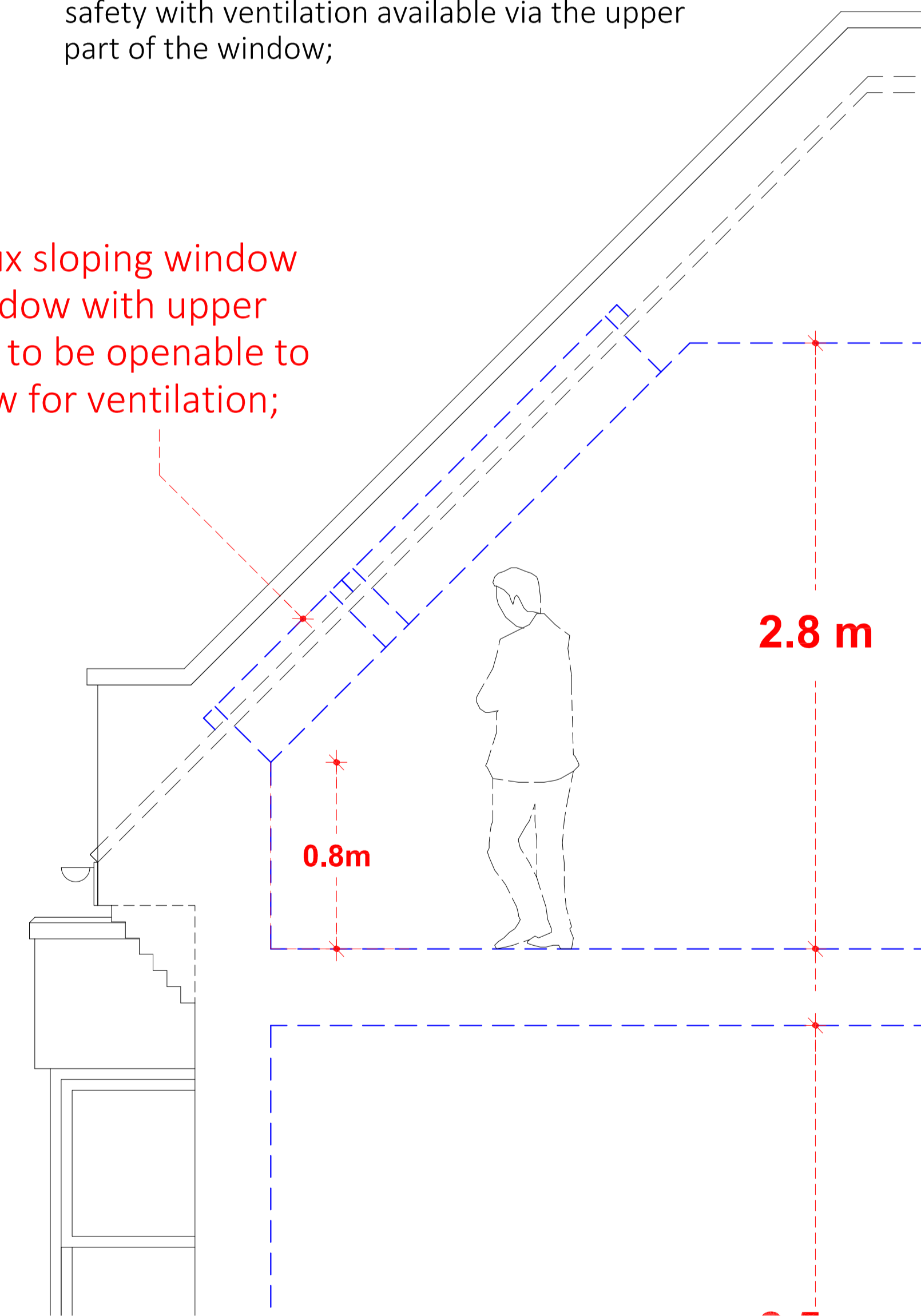
Proposed Site Plan
(Scale 1:500)



Typical image of 'floor-to-ceiling' window for expansive views, more natural daylight and light depth into the room.

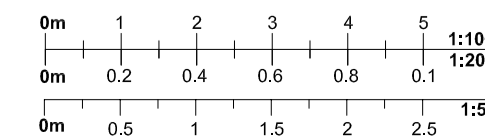
The fixed lower part of the window ensures safety with ventilation available via the upper part of the window;

Velux sloping window
Window with upper
part to be operable to
allow for ventilation;



Proposed Section
(Scale 1:20)

Notes
Report any discrepancies
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Rev. Date Drawing Description
A 08/03/23 10/10/2023
Planning Application

Project
24-26 Churchbury Lane Enfield
EN1

Project Description
Proposed Works

Drawing Name
Proposed Sections with Levels

Date
30.07.23

Scale:
1:100 + 1:20
@ A1

Draw. No.
Chu/22/PP/07C

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 16 July 2024
Report of: Head of Planning & Building Control: Karen Page	Contact Officer: Gideon Whittingham	Ward: Brimmsdown
Application Number: 21/01140/FUL		Category: Major
LOCATION: Public House, Green Street, Enfield EN3 7SH		
PROPOSAL: Redevelopment of site to provide a mixed-use development scheme of 17 storeys comprising 15 residential floors in addition to 2 commercial ground and mezzanine floors with associated landscaping and parking *REVISED DESCRIPTION*		
Applicant Name & Address: Mr Tepe		Agent Name & Address: Mr Murat Aydemir Intelliarch Ltd 47 Eversley Park Road London N21 1JJ
RECOMMENDATION:		
<ol style="list-style-type: none"> 1. That planning permission be REFUSED 2. That the Head of Planning & Building Control be granted delegated authority to agree the final wording of the reasons for refusal as indicated in the Recommendation section of the report, subject to: <ol style="list-style-type: none"> I. The inclusion of any changes requested by the GLA in their stage 2 referral and/or government body. II. Prior to the decision being issued after consultation with the Chair, Vice Chair and Opposition lead on the materiality of any changes arising from any other development plan document or any new/altered other material planning consideration. 		

1. NOTE FOR MEMBERS

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

2. EXECUTIVE SUMMARY

- 2.1 This application was reported to Planning Committee on 19 July 2022 and 18 October 2022.
- 2.2 On each occasion, the application was recommended for refusal and on each occasion, Members resolved to defer the application to enable additional information to be assessed and so as to allow time for further negotiations with the Applicant on the reasons for refusal identified.
- 2.3 Following Planning Committee on 18 October 2022, significant negotiations with the Applicant on the reasons for refusal identified took place, involving Enfield's Director of Planning and Growth, Head of Development Management, Planning and Design officers.
- 2.4 Over the course of 12 months, extensive negotiations primarily focused on design and character, however meetings did cover incidental elements regarding highway and transport implications, impacts on neighbouring amenity and sustainable drainage and water infrastructure. It was agreed by both parties that material considerations requiring specific technical /specialist input, such as viability/affordable housing, sunlight and daylight, flooding, biodiversity for example would be better served outside of these meetings, to be addressed by the Applicant once substantive design matters had been agreed.
- 2.5 Concluding on 24 October 2023, the Council's Planning Team provided formal commentary based on the progress of amendments thus far.
- 2.6 In April 2024, the Applicant submitted an amended proposal for the Council's consideration.
- 2.7 The most recent scheme presented to Members at Planning Committee on 18 October 2022 proposed the redevelopment of site to provide mixed use residential development, involving the erection of a 21 storey building with double basement, comprising 100 self-contained (private and social residential units), in addition to commercial and retail areas on ground and mezzanine.
- 2.8 The proposal now involves the redevelopment of the site, including the demolition of the existing public house and ancillary buildings (Sui Generis) totalling 531sqm, for the construction of buildings 53m in height, ranging from 8 to 17 storeys to provide two flexible commercial units (Use Class E) at ground and mezzanine level, 81 residential units at upper floor levels, including vehicular access from Green Street, car/cycle parking, landscaping, and other associated works.
- 2.9 The site is considered brownfield and a sustainable location and has the potential to accommodate an appropriately scaled mixed use development that could significantly intensify the usage of this site adjacent to one of the boroughs transport nodes.

- 2.10 Developing existing brownfield land protects the Borough's greenfield and greenbelt land, thus preserving this important characteristic of Enfield – and is supported at all planning policy levels, nationally, London-wide and within Enfield's adopted development plan policies.
- 2.11 The proposal would support London Plan policies, which seek to increase housing supply and optimise site capacity. The site is assessed to be a sustainable location suitable for delivery of new high-quality housing – which is supported in principle. The introduction of residential accommodation is supported in strategic and placemaking terms and given great weight in the assessment of the application. The proposed level of family-housing (15%) is less than Local Plan policy calls for. However, this has been informed by the characteristics of the scheme.
- 2.12 Given its height, prominence and status as a landmark, the proposal, by virtue of its visual, functional and cumulative impacts fails to demonstrate exceptional design quality.
- 2.13 The identified harm to the non-designated heritage assets (site building) has been balanced against the benefits of the development, noting that considerable importance and weight should be attached to this harm, in reaching a conclusion as to the acceptability of the proposals.
- 2.14 The financial viability of the proposal indicates no affordable homes would be deliverable as part of this proposal.
- 2.15 The proposal would represent a flood risk for the occupiers of the site and an increased flood risk for its neighbours and this part of Enfield.
- 2.16 The report details all relevant national, regional, and local policy implications of the scheme, including supplementary planning guidance. Overall, whilst we recognise the proposal would provide housing and employment that contributes to meeting the needs of the Borough, identified elements of substantial harm result from the proposal which would not be outweighed by the public benefits of delivering new residential accommodation. and is therefore recommended for refusal.
- 2.17 This report shall focus on the now amended proposal, as opposed to a comparison of the various iterations presented to Members at Planning Committee on 19th July 2022 and 18 October 2022. The relevant committee reports have been attached within the appendices for review.
- 2.18 All comments received as a result of public consultation for each iteration of the scheme have been carried over and robustly accounted for within this report.

3. RECOMMENDATION

3.1 The Head of Planning & Building Control be authorised to **REFUSE** planning permission for the following (updated) reasons:

- The proposed development, form, appearance and design, is not well designed and would represent an insufficiently high quality, incongruous form of development that, having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, fails to satisfactorily integrate with its surroundings negatively impacting on the enjoyment, function and safety of surrounding spaces, detrimental to and out of keeping with the character and appearance of the surrounding area which would not be outweighed by the public benefits of delivering new residential accommodation. 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 and Objective 10 of the Enfield Heritage Strategy 2019.
- The proposed development is not accompanied by an adequately comprehensive sustainable drainage strategy that would clarify how the development shall meet Greenfield Runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) events and utilise Sustainable Urban Drainage Systems (SuDS) in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management. As such the proposal fails to accord with Policies SI12 and SI13 of the London Plan (2021), Policy CP21 and CP28 of the Enfield Core Strategy (2010) and Policy DMD61 of the Enfield Development Management Document (2014).
- That the Head of Planning & Building Control be granted delegated authority to agree the final wording of the reasons for refusal to cover the matters in the Recommendation section of this report.

4. SITE AND SURROUNDINGS

- 4.1 The site is an irregularly kite-shaped parcel of land located on the eastern side of Green Street, within the Brimsdown ward.
- 4.2 The site, approximately 0.14 hectares in size, contains a vacant two-storey public house, last operated as 'The Station Tavern'. The site also contains a car park and two single-storey ancillary buildings located on the eastern boundary.
- 4.3 In terms of the wider context, to the southwest of the site is a 2-storey parade (Nos. 245 – 257 Green Street), where the ground floors are in commercial use with the upper floors being in residential use.
- 4.4 To the southeast of the site is a 3-storey residential block of 12 flats (Langley Court – No.243 Green Street).
- 4.5 To the east, the site is bound by Brimsdown Railway Station and beyond which lies a large swathe of designated land.
- 4.6 To the north of the site, across the highway of Green Street is the distinctive 4 storey block of 44 flats (No.44 Stonycroft Close) with a dodecahedron shaped footprint, at a distance of approximately 19m.
- 4.7 To the west of the site, across the highway of Green Street are semi detached 2-storey dwellings on Brimsdown Avenue (Nos.1-15) and Green Street (Nos.342-356), at a distance of approximately 28m. Behind Green Street is Goldsdown Close.
- 4.8 The site is moderately well connected in terms of public transport and has a good Public Transport Accessibility Level (PTAL) rating of 3 and is sited adjacent to the Brimsdown Railway Station, which offers access to rail services on the West Anglia main line.
- 4.9 The following policy designations / characteristics apply to the site:
 - Brimsdown Local Centre
 - Flood Zone 2
 - North East Enfield Area Action Plan
- 4.10 The main site building itself forms a non-designated heritage asset, derived from its architectural, historic and communal value.
- 4.11 The site is neither located within or near a conservation area or statutorily listed building.
- 4.12 The following designations are adjacent to the site:
 - Area of Architectural Importance
 - Strategic Industrial Location

5. PROPOSAL

- 5.1 This is a 'Full' planning application for the comprehensive redevelopment of the site.
- 5.2 The proposal involves the demolition of the existing public house and ancillary buildings (Sui Generis) totalling 531sqm for the construction of buildings 53m in height, ranging from 8 to 17 storeys to provide two flexible commercial units (Use Class E) at ground and mezzanine level, 81 residential units at upper floor levels, including vehicular access from Green Street, car/cycle parking, landscaping, and other associated works.
- 5.3 The flexible commercial units facing Green Street, would be located at ground and mezzanine floor level within the building.
- 5.4 The residential element, located at upper floor level would contain 81 residential units in total, comprising 29no. one bed units (36%), 37no. two bed units (46%) and 15no. three bed units (18%).
- 5.5 The supporting documents indicate the provision and quantum of affordable housing would be determined on the basis of the viability assessment. On this basis, no affordable housing shall be provided as part of this proposal.
- 5.6 With regard the quality of accommodation, all units feature private amenity space via balconies. Whilst 69 out of 81 units would be dual aspect.
- 5.7 The building would be served by two lift cores and two staircases up to the 12th floor, with the remaining upper floor levels served by one lift core and two staircases.
- 5.8 Outdoor communal space would be located at 7th, 9th, 11th and 13th floor levels. Indoor communal space (for the sole use of the residents) would be located at mezzanine floor level, along with ancillary communal areas such as creche, and management office.
- 5.9 The 1st – 6th, 8th, 10th, 12th, 14th-15th main roof levels would not serve as communal amenity spaces.
- 5.10 With regard to transport infrastructure, the development would be car-free, except for 3no. disabled off street parking bays and 3no. off street parking spaces (drop off). The site would provide a total of 180 cycle spaces, of which 124no. are internal and 56no. are external. Refuse storages and recycling areas would be located at ground floor level.
- 5.11 For clarity, the Applicant describes the floor above ground level as the 'mezzanine level'. As a result, the plans describe the top level of the building as the fifteenth floor. Irrespective, the above description of the proposal provides the necessary clarity as to what the development entails.
- 5.12 In addition, the Applicant describes a number of 'possible drop off zones' and a 'possible multi-purpose communal area' at ground floor, along with a 'possible multi-purpose communal area' at mezzanine level. The relevant portion of the report shall comment on the assessment these matters received.

6. RELEVANT PLANNING DECISIONS

- 6.1 **17/04984/PREAPP** - Proposed change of use and extensions to existing building to provide 40 x residential units and 3 x commercial units. Advice Issued 25.01.2018

Conclusion - The development raises an in-principle objection, in that it involves the loss of a public house – a community facility, although this objection can potentially be overcome through robust justification. However, the development as currently proposed, will not receive officer support in its present form.

The overall design of the building will need to be reconsidered. The design principles espoused in adopted policy and guidance must be clearly demonstrated in order to provide a development which will relate better to its immediate surroundings. As advised above, there is some potential to provide a building which is taller than the surrounding developments, to act as a way-marker for the adjacent station but given the low-rise developments adjacent to this site, a gradual step up from the boundaries should be considered.

The scale of the development is considered an overdevelopment of the site. Whilst the LPA will have regard to policies which seek to maximise the provision of housing and therefore could potentially accept development which does not strictly conform to the suggested density ranges of the London Plan, however, all other elements of the scheme must be acceptable.

The lack of any landscaping around the site is a cause for concern and will need to be addressed.

- 6.2 **19/03610/PREAPP** - Proposed redevelopment of site to create 148 residential units, 4 retail units, 12 offices, 2 restaurants and gym. Advice Issued 05.02.2020

Conclusion - The Council would be supportive of a housing led mixed use redevelopment of the site. The proposals in development suggest significant regenerative benefits that would spring from the optimisation of the usage of this important urban site including the renewal of the urban fabric, delivery of much needed affordable housing and new street facing commercial activity.

The Council needs to balance these potential benefits against the unfeasibly high residential densities proposed and the proposed scale, bulk and mass which, at 24 storeys is wholly at odds with the scale of the existing surroundings.

Whilst the redevelopment of this site has the potential to be a catalyst for development nearby, the proposed scale has significant difficulties in its relationship with the smaller residential and mixed use buildings in the immediate vicinity. Accordingly, the scale of the proposals may need to be reconsidered in the context of their present surroundings.

There remain significant highways related matters that would need to be resolved before any application is made.

7. CONSULTATIONS

Public Consultation

7.1 Accounting for Enfield's Statement of Community Involvement (SCI), public consultation on the application involved:

- Notification letters being sent to 825 neighbouring properties on 22 May 2024 (giving people 21-days to respond)
- A site notice placed outside the site (giving people 21-days to respond)
- A press advert in the Enfield Independent on 8 May 2024 (giving people 14 days to respond).

7.2 The number of representations received from neighbours, local groups etc. in response to the above notification and publicity of the application are outlined below.

7.3 Number of representations received in support: 1

- Positive Contribution: Enhances surroundings, contributes to regeneration, and improves the quality of the area.
- Economic Benefits: Brings inward investment and creates new employment opportunities.
- General Approval: Receives general support for its high-quality design and good access arrangements.
- Public Realm and Housing: Improves the public realm and provides new, including affordable, homes.
- Transport Impact: Expected to have no negative impact on the transport network.

7.4 Number of representations objecting received: 30

Environmental Impact:

- Local Ecology: The development is expected to negatively affect the local ecology, disrupting existing natural habitats.
- Pollution: Concerns about an increase in pollution levels, which could further harm the environment and residents' health.

Design and Scale:

- Height: The development is considered excessively high, overshadowing surrounding buildings and altering the skyline unfavourably.
- Character: It is perceived to be out of keeping with the character of the area, which consists of lower, more traditional structures. The scale and design do not blend with the existing architectural style.
- Overdevelopment: The proposal is seen as an overuse of the available land, leading to overcrowding and a lack of green spaces.

Infrastructure:

- Access: The development offers inadequate access routes, potentially causing congestion and making it difficult for emergency services to operate efficiently.
- Parking: The plan does not provide enough parking spaces for residents and visitors, likely resulting in parking spill over into neighbouring areas.

- Public Transport: There are insufficient public transport provisions to support the increased population, potentially leading to higher car usage and traffic.

Community Impact:

- Noise: The construction and subsequent increase in population are expected to lead to higher noise levels, disturbing the current residents.
- Light: The height and density of the new buildings will result in a significant loss of natural light for adjacent properties.
- Privacy: Neighbours will experience a loss of privacy due to the proximity and height of the new buildings.
- Parking: The development will lead to a loss of existing parking spaces, exacerbating parking issues in the area.
- Community Facilities: The increased population will put additional strain on already stretched community facilities such as schools, healthcare, and recreational centres.
- Insufficient Information: The application is criticized for not providing enough detailed information, making it difficult for stakeholders to fully understand the impacts and plan accordingly.

General Disapproval:

- Open Space: There is a call for more open spaces within the development to ensure a balanced living environment.
- Dislike of Proposal: Overall, there is a general dislike that it does not benefit the community and could degrade the quality of life for current residents.

7.5 A petition of objections was received with 136 signatures stating:

- Inadequate response time for residents to assess the proposal.
- The 17-story building exceeds local Enfield plan limits.
- The building's height is excessive and does not fit the neighbourhood's character.
- Close to Brimsdown Train Station, construction could disrupt rail services and cause traffic congestion.
- The proposal does not meet London's green space standards.
- Concerns about fire safety due to the building's height.
- Lacks enough two and three-bedroom homes needed for families.
- The site has historical value that needs preservation.
- Building height will reduce privacy and light for existing residents.
- Elevated gardens lack detailed safety measures, posing risks.
- Increased traffic from construction poses pedestrian safety concerns.

Statutory and Non-Statutory Consultees

7.6 *Internal Consultations:*

- Traffic & Transportation – No objection, subject to conditions and package of measures/contributions including CPZ (separate fee), loading bay (separate fee), car club, cycle infrastructure, travel plan, pedestrian infrastructure, parking surveys at £90,000. Further comments are incorporated in the body of the report.
- Sustainable Drainage – Objection raised regarding several aspects of the proposal. Comments are incorporated in the body of the report.
- Design – Objects. Concerns regarding several aspects of the proposal. Comments are incorporated in the body of the report.
- Viability - Additional comments shall be reported at the meeting.
- Heritage – Objects, subject to benefits outweighing harm and meeting design standards. Comments are incorporated in the body of the report.
- Section 106 – No additional comment provided in respect of financial and nonfinancial contributions applicable for a scheme of this nature.
- Environmental Health – No objection, subject to conditions regarding noise, air quality and contamination. Further comments are incorporated in the body of the report.
- Building Control – Fire Strategy requires amendment secured by condition, to the extent that it affects land use planning. Comments are incorporated in the body of the report.
- Refuse/Waste – No additional comment provided. Comments are incorporated in the body of the report. Comments are incorporated in the body of the report.
- Energy – No additional comment provided. Comments are incorporated in the body of the report.
- Crossovers - No additional comment provided. Comments are incorporated in the body of the report.
- Planning Policy – No additional comment provided. Comments are incorporated in the body of the report.

7.7 *External Consultations:*

- Environment Agency – No Objection. The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding. We therefore do not wish to raise an objection to the proposal based upon our published flood maps. We note however, that the Enfield Level 1 Strategic Flood Risk Assessment highlights that this development falls within the 1 in 100 + 17% Climate Change extent. This means that the local authority may wish to consider requesting finished floor levels above the depth of this extent, flood plain compensation, and other flood mitigation and resilience measures to ensure that the development is not at risk of flooding or does not increase flood risk elsewhere. Further comments are incorporated in the body of the report
- British Transport Police - No Objection. Amendment to design request so that no balconies face railway, to prevent crime and disruption by reducing the likelihood of objects being thrown onto the railway. Further comments are incorporated in the body of the report.

- Metropolitan Police – No objection subject to conditions regarding secured by design. Further comments are incorporated in the body of the report
- Greater London Authority (Mayor):
 - i. The GLA issued a Stage 1 report based on the originally submitted scheme presented to Members at Planning Committee on 19 July 2022, namely the redevelopment of site to provide mixed use residential development, involving the erection of a 21 storey building with double basement, comprising 100 self-contained (private and social residential units), in addition to commercial and retail areas on ground and mezzanine. In summary, comments were as followed:
 - Land use principle: Justification required in relation to loss of public house
 - Affordable housing: In absence of affordable housing, viability assessment by GLA, paid for by Applicant, would be required at Stage 2
 - Design and heritage: significant concern regarding the height, massing, layout, architectural design and appearance of the building
 - Issues also need to be resolved in relation to play space, fire safety, inclusive design, sustainable development and transport.
 - ii. The GLA provide commentary on the current submission noting:
 - Following a resolution to either grant or refuse permission, Stage 2 referral to the Mayor for his final decision would take place.
 - In absence of affordable housing, viability assessment by GLA, paid for by Applicant, would be required at Stage 2
 - Public benefits of scheme require further explanation
- Thames Water – No objection subject to conditions regarding pilling, groundwater and water sewerage. Further comments are incorporated in the body of the report
- Health and Safety Executive (HSE/ Planning Gateway One): We cannot comment on planning applications from local planning authorities submitted prior to that date (unless a subsequent application, after 1st August 2021, is made under section 73 of the Town and Country Planning Act 1990). Therefore, on this occasion we will not be able to provide a response to this application. Please also note for future reference a fire statement should be provided by the developer as part of their planning application for relevant buildings.
- Energetik: No additional comment provided
- NHS The London Healthy Urban Development Unit (HUDU) - No additional comment provided
- Historic England: No comment provided
- Historic England (GLAAS): No comment provided
- Network Rail: No comment provided

8. RELEVANT POLICIES

- 8.1 Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions of the development 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 (February 2023)

- 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 recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 8.4 In relation to achieving appropriate densities paragraph 128 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.

- 8.5 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.
- 8.6 Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development. For decision taking this means:
- “(c) approving development proposals that accord with an up-to-date development plan without delay; or
- (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:
- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.”
- 8.7 Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 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 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.
- 8.9 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.
- 8.10 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.
- 8.11 In the period 2019/20 to 2021/2022, the Council has met 73% of its housing target delivering 995 homes in 2021/22. This is an improvement on the previous year (847 completions) despite challenging market conditions. However, as delivery across three years is 73% of the Government’s requirement, the Council is

placed in the 'presumption' category. This requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5-year housing land supply which is monitored through the AMR.

- 8.12 This is referred to as the "tilted balance" and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

National Planning Practice Guidance (NPPG)

- 8.13 The Government published NPPG sets out further detailed guidance on the application of policies set out in the NPPF. NPPG guidance covers matters such as decision making, planning conditions and obligations, Environment Impact Assessments (EIAs), the historic and natural environment and design.

The London Plan 2021

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

- GG1 Building Strong and Inclusive Communities
- GG2 Making the Best Use of Land
- GG3 Creating a Healthy City
- GG4 Delivering the Homes Londoners Need
- GG6 Increasing efficiency and resilience
- SD1 Opportunity Areas
- D1 London's form, character and capacity for growth
- D2 Infrastructure Requirements for Sustainable Densities
- D3 Optimising Site Capacity Through the Design-led Approach:
- D4 Delivering Good Design
- D5 Inclusive Design
- D6 Housing Quality and Standards
- D7 Accessible Housing
- D8 Public Realm
- D9 Tall Buildings
- D11 Safety, Security and Resilience to Emergency
- D12 Fire Safety
- D13 Agent of Change
- D14 Noise
- E11 Skills and Opportunities for All
- H1 Increasing Housing Supply
- H4 Delivering Affordable Housing

H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H10	Housing Size Mix
HC1	Heritage Conservation and Growth
HC7	Protecting public houses
G1	Green Infrastructure
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodlands
S1	Developing London's Social Infrastructure
S3	Education and childcare facilities
S4	Play and Informal Recreation
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI 4	Managing heat risk
SI5	Water infrastructure
SI6	Digital Connectivity Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy
SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.1	Residential Parking
T7	Deliveries, servicing and construction
T9	Funding Transport Infrastructure Through Planning
DF1	Delivery of the Plan and Planning Obligations

Enfield Local Plan

- 8.15 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 the London Plan (2021), it is noted that the London Plan supersedes the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan

Local Plan – Core Strategy (2010)

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

CP 1	Strategic Growth Areas
CP 2	Housing Supply and Locations for New Homes
CP 3	Affordable Housing
CP 4	Housing Quality
CP 5	Housing Types
CP 9	Supporting Community Cohesion
CP 16	Taking part in economic success and improving skills
CP 17	Town Centres
CP 20	Sustainable Energy Use and Energy Infrastructure
CP 21	Delivering Sustainable Water Supply, Drainage Sewerage Infrastructure
CP 24	The Road Network
CP 25	Pedestrians and Cyclists
CP 26	Public Transport
CP 28	Managing Flood Risk Through Development
CP 29	Flood Management Infrastructure
CP 30	Maintaining and Improving the Quality of the Built and Open Environment
CP 31	Built and Landscape Heritage
CP 32	Pollution
CP 34	Parks, Playing Fields and Other Open Spaces
CP 36	Biodiversity
CP 40	North East Enfield

Local Plan - Development Management Document (2014)

- 8.18 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.
- 8.19 The following local plan Development Management Document policies are considered particularly relevant:
- | | |
|--------|------------------------------------------------------------|
| DMD 1 | Affordable Housing on Sites Capable of Providing 10 units+ |
| DMD 3 | Providing a Mix of Different Sized Homes |
| DMD 6 | Residential Character |
| DMD 8 | General Standards for New Residential Development |
| DMD 9 | Amenity Space |
| DMD10 | Distancing |
| DMD 28 | Large Local Centres, Small Local Centres and Local Parades |
| DMD 37 | Achieving High Quality and Design-Led Development |
| DMD 38 | Design Process |
| DMD 39 | Design of business premises |
| DMD 40 | Ground Floor Frontages |
| DMD 43 | Tall Buildings |
| DMD 44 | Conserving and Enhancing Heritage Assets |
| DMD 45 | Parking Standards and Layout |
| DMD 47 | New Road, Access and Servicing |
| DMD 48 | Transport Assessments |
| DMD 49 | Sustainable Design and Construction Statements |
| DMD 50 | Environmental Assessments Method |
| DMD 51 | Energy Efficiency Standards |
| DMD 52 | Decentralized Energy Networks |
| DMD 53 | Low and Zero Carbon Technology |
| DMD 54 | Allowable Solutions |

DMD 55	Use of Roofspace/ Vertical Surfaces
DMD 56	Heating and Cooling
DMD 57	Responsible Sourcing of Materials, Waste Minimisation
DMD 58	Water Efficiency
DMD 59	Avoiding and Reducing Flood Risk
DMD 60	Assessing Flood Risk
DMD 61	Managing surface water
DMD 62	Flood Control and Mitigation Measures
DMD 64	Pollution Control and Assessment
DMD 65	Air Quality
DMD 68	Noise
DMD 69	Light Pollution
DMD 70	Water Quality
DMD 71	Protection and Enhancement of Open Space
DMD 72	Open Space Provision
DMD 73	Child Play Space
DMD 78	Nature Conservation
DMD 79	Ecological Enhancements
DMD 80	Trees on Development Sites
DMD 81	Landscaping

Additional Material Considerations and guidance

8.20 The following guidance is also considered particularly relevant:

BRE: Site layout planning for daylight and sunlight, A guide to good practice (2022)
 Enfield Climate Action Plan (2020)
 Enfield Housing and Growth Strategy (2020)
 Enfield Intermediate Housing Policy (2020)
 Enfield Biodiversity Action Plan
 Enfield Characterisation Study (2011)
 Enfield S106 SPD (2016)
 Enfield Decentralised Energy Network Technical Specification SPD (2015)
 Environmental Agency: Flood Risk Assessment Guidance for New Development (2005).
 GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
 GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
 GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
 GLA: London Sustainable Design and Construction SPG (2014)
 GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
 GLA: Housing SPG (2016)
 GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
 GLA: Threshold Approach to Affordable Housing on Public Land (2018)
 GLA: Upper Lee Valley Opportunity Area Planning Framework (2013)
 Healthy Streets for London (2017)
 Institute Of Highway Incorporated Engineers: Home Zone Design Guidelines (2002)
 London Councils: Air Quality and Planning Guidance (2007)
 Mayor's Transport Strategy (2018)
 Mayor's London Plan Guidance: Housing Design Standards (2023)
 Manual for Streets 1 & 2, Inclusive Mobility (2005)
 National Design Guide (2019)
 New Enfield Local Plan 2041: Level 1 Strategic Flood Risk Assessment (2021)

North East Enfield Area Action Plan (2016)
 North London Waste Plan (2022)
 TfL London Cycle Design Standards (2014)

Enfield Draft New Local Plan and Draft Proposals Map

- 8.21 The New Enfield Local Plan (ELP) was published at Regulation 19 Stage between 28 March and 28 May 2024. The Enfield Local Plan is at an advanced stage of preparation and is considered by the Council to be sound and will not be modified significantly prior to examination.
- 8.22 NPPF 2023 Paragraph 48 states that decision-makers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the London Plan and NPPF 2023. As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight. At this stage, it has relatively little weight in the decision-making process.
- 8.23 It is not yet known whether the Council will submit the ELP for examination but it is possible that more than limited weight could be given to a policy or group of policies if it were clear (i) that they are consistent with the NPPF and (ii) that there is no objection to them (in relation to the parts of the policies relevant for the decision).
- 8.24 However, if there are substantial objections to any policy then it would be unlikely that the Council could justify giving it more than limited weight.
- 8.25 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.

Key emerging policies from the plan are listed below:

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

CL6	Protecting and attracting public houses
SP D1	Securing contributions to mitigate the impact of development
SPBG3	Biodiversity net gain, rewilding and offsetting

First Homes

8.26 On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this application, the WMS has been taken into account as a material consideration when considering this report and the officer's recommendation.

9. ANALYSIS

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

- Land Use Principles
- Housing and Affordable Housing
- Design and Townscape
- Heritage
- Residential Quality and Amenity
- Impact on Neighbouring Residential Amenity
- Transport, Access and Parking
- Habitat Regulations Assessment
- Open Space, Landscaping and Trees
- Biodiversity and Ecology
- Sustainability and Climate Change
- Noise and Air Quality
- Contaminated Land
- Fire Safety
- Flood Risk and Drainage
- Socioeconomics and Health
- Waste and Recycling
- Public Sector Equality Duty
- Section 106 and Community Infrastructure Levy

Land Use Principles

9.2 In terms of the overarching principle of development the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise.

9.3 Additionally, the aim is that planning should facilitate the delivery of sustainable development. This is achieved by ensuring that the right development is built on the right land; that development helps to support communities with sufficient homes, accessible services, and open spaces; and development protects and where appropriate, enhances the natural, built and historic environment.

9.4 Paragraph 185 of the NPPF in "Section 15: Conserving and enhancing the natural environment"

9.5 Paragraph 8 of the NPPF sets out three overarching objectives, in order to achieve sustainable development. These objectives are interdependent and

need to be pursued in mutually supportive ways and include the following (with detail provided on the most relevant objective to this section): a) an economic objective; b) a social objective; and, c) an environmental objective –to contribute to protecting and enhancing our natural, built and historic environment.

- 9.6 With regards to the existing land use, it is noted that the paragraph 124 of the NPPF advocates the promotion and support the development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 9.7 Furthermore, paragraph 1.2.5 of the London Plan states that ‘all options for using the city’s land more effectively will need to be explored as London’s growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London’. In particular, Policy GG2 requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield land and delivering additional homes.

Residential Use

- 9.8 The London Plan (LP) supports the building of more homes through Policy GG4. This policy promotes the delivery of genuinely affordable homes and the creation of mixed and inclusive communities, with good quality homes that meet high standards. Policy GG2 requires development proposals to make the best use of land by enabling development on brownfield land well-connected by public transport and by applying a design-led approach to determine the optimum development capacity of sites.
- 9.9 The LP also supports increasing housing supply and optimising housing potential through Policy H1, which states that the potential for housing delivery on all suitable and available brownfield sites should be optimised.
- 9.10 The LP Policy H1 sets a London wide 10-year housing target for 522,870 net additional homes to be completed by 2029, with Enfield set a 10-year target of 12,460 new homes during this period. The proposals would result in a significant net increase of 1,233 additional homes (2,028 less 795 existing homes). This equates to approximately 10% of Enfield’s 10-year housing target.
- 9.11 Enfield’s Core Strategy (CS) (adopted 2010) supports the provision of high quality, inclusive and affordable homes, seeking to meet and exceed the borough housing targets (set by the Mayor of London).
- 9.12 Spatial Strategy 4.1 of the Council’s CS takes a proactive approach to focusing change in areas of the Borough where regeneration and the revitalisation of communities is needed 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 site is located within the Upper Lee Valley Opportunity Area that extends approximately 14 kilometres from the M25 in the north, to Lea Bridge in the south and is approximately 3.5 kilometres across at its widest point. Large amounts of housing (it is home to around a quarter of a million people); and the A10/A1010 Corridor, with its town centre functions; form key features of the area, along with industrial land and retail parks. The Upper Lee Valley

Opportunity area has been identified in LP Policy SD1 for redevelopment with new well-designed homes.

- 9.13 Enfield Housing's Trajectory Report 2019 shows that during the preceding 7-years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with 51% of approvals over the preceding 3-years have been implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 9.14 It is clear there is an identified need for additional housing and, in particular, affordable housing. The proposal for 81 homes accords with London Plan Policy GG2, which advocates making the best use of land and building to suitable densities on well-connected sites. The aim to strengthen the provision of a site within a residential setting is supported. The proposal seeks to extend the provision of housing by making more efficient use of land and providing a high quality of homes where the existing building no longer presents an optimal housing offer.
- 9.15 Reviewed against strategic policies of the Development Plan and emerging Local Plan policies, the principle of residential housing at this site is supported. The residential-led regeneration of the Site would make a substantial contribution towards meeting local and strategic housing targets and is strongly supported, in accordance with LP Policy H1, which seeks to increase housing supply by optimising the potential for housing delivery on suitable brownfield sites.

Non-Residential Uses

- 9.16 Paragraph 97 of the NPPF in "Section 8: Promoting healthy and safe communities" sets out how policies and decisions should provide the social, recreational and cultural facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and services the community needs.
- 9.17 LP Policy HC7 "Protecting public houses" aims to protect pubs that have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. The following text provides a guide for assessing the value of the pub:

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

- a. is in a Conservation Area*
- b. is a locally- or statutorily-listed building*
- c. has a licence for entertainment, events, film, performances, music or sport*
- d. operates or is closely associated with a sports club or team*
- e. has rooms or areas for hire*
- f. is making a positive contribution to the night-time economy*
- g. is making a positive contribution to the local community*

h. his catering for one or more specific group or community.”

- 9.18 Paragraph 7.7.7 of the LP also suggests 24 months marketing evidence needs to be provided in order to rule out demand for its existing use or any alternative community use.
- 9.19 Whilst limited weight is given to the emerging Draft Enfield Local Plan, the Draft Plan approach seeks to resist the loss of public houses. Policy CL6 and SC2 of the Draft Enfield are relevant to the loss of a public house where policy SC2 seeks to protect community facilities (including pubs) by resisting their loss unless the criteria set out in part 1 of the policy have been met. Policy CL6 focuses specifically on public houses and resists their loss unless robust evidence is provided as set out in part 1 of the policy.
- 9.20 Policy CL1 (Promoting culture and creativity) of the Draft Plan takes a similar approach and aims to protect pubs unless they are:
1. surplus to requirements and unviable;
 2. alternative provision has been made in the vicinity; and,
 3. appropriate marketing for continuous period of at least 18 months has taken place.
- 9.21 Policy DMD17 states that the Council will protect existing community facilities in the borough unless a suitable replacement is provided or there is no demand for the existing use or any alternative community use. In some areas of the borough where community service provision is already low this may include public houses. Examples of community facilities include:
- Recreation, leisure, culture and arts facilities, including theatres;
 - Libraries;
 - Outdoor and indoor sports facilities;
 - Schools and other educational and training institutions;
 - Facilities for early years provision;
 - Health facilities;
 - Day centres vulnerable adults and carers;
 - Community halls and centres;
 - Places of Worship;
 - Emergency service and policing facilities, accessible to the public.
- 9.22 The Applicant has submitted marketing evidence, albeit not continuously, to demonstrate the condition of the building, demand for its existing use and viability.
- 9.23 The Applicants evidence indicates that the Station Tavern, formerly known as the Izaak Walton, ceased trading in the early part of 2017. Built in 1924, the interior of the main building is that of a single room with a pool area and fixed seating to the right, beyond which are public toilets and an external paved/patio area facing the car park, whilst to the left are public toilets and fixed seating for a more defined dining area of approximately 31 covers and an external paved/patio area. The bar/serving area is to the rear, with the operational element such as the kitchen and store beyond. A portion of the ancillary building also serves as a store. The Station Tavern lacked sufficient communal space to serve as a focal point for community activities such as sports teams, social groups, local societies, and community meetings, with the upper floor in

ancillary use to the operational side of the public house, as opposed to function rooms.

- 9.24 Although the Applicants marketing exercise would not meet the requirement of 'authoritative marketing evidence', as per the London Plan and criterion b of DMD17, the supporting information demonstrates the established public house has struggled to remain open. The Applicants evidence indicates that without significant investment and redevelopment to provide a greater or diverse offer to the wider community, such as quiz nights, live music, sports or social clubs, children's play areas and evening classes for example, the current public house format is neither attractive to an operator nor commercially viable.
- 9.25 Objections have been received in regard to the loss of the existing use, however the public house has not been formally designated as an Asset of Community Value (ACV). Listing a pub as an ACV gives voluntary groups and organisations the opportunity to bid for it if it is put up for sale. The 'right to bid' is not a right to buy and although owners of the asset have to consider bids from community groups, they do not have to accept them. An ACV listing does, nevertheless, give communities an increased chance to save a valued pub or other local facility. The listing of a public house as an ACV is however a material consideration when assessing applications for a change of use.
- 9.26 With regard to a suitable replacement community facility provided, the proposal would include two flexible (Use Class E) commercial units of 100sqm and 187sqm.
- 9.27 Use Class E of the Use Classes Order 1987 (as amended) was introduced on 1st September 2020 and covers the former use classes of A1 (shops), A2 (financial and professional), A3 (restaurants and cafes) as well as parts of D1 (non-residential institutions) and D2 (assembly and leisure) and puts them all into one new use class.
- 9.28 As a result, the flexible commercial units proposed could continue to meet local community needs, facilitate social interaction, and promote inclusive communities as Use Class E would permit their use for early years provision, health facilities or indoor sports facilities for example. Whilst Use Class E would not extend to a public house, the proposal would not result in the unacceptable loss of community facilities, but a replacement facility to a suitable degree.
- 9.29 The proposed flexible commercial units would support the Brimsdown Local Centre and provide a service that is compatible and appropriate, in accordance with DMD 28. Local flexible commercial units remain essential in the locality and have a key role to play in delivering sustainable economic growth and, would cater for the future needs created by the projected population increase and higher density living as a result of this development.

Efficient use of land and optimising site capacity

- 9.30 Objections have been received that the proposals would result in overdevelopment and excessive density within the locality. Officers have assessed density and site capacity and consider the proposals are aligned with adopted local and regional (London) policies and guidance in respect of density.
- 9.31 Officers have assessed that the proposal is aligned with requirements of the NPPF, that planning decisions should give substantial weight to the value of

using suitable brownfield land within settlements for homes and that planning decisions should promote and support the development of under-utilised land, including through the more effective use of car parks.

- 9.32 Paragraph 124 of the NPPF in “Section 11: Making Effective Use of Land” sets out 5 points planning decisions should consider in promoting the effective use of land. It supports development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively. Paragraph 124 parts (c) and (d) are particularly relevant, stating that planning decisions should:
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...;*
 - d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).*
- 9.33 Paragraph 127 encourages that local authorities take a positive approach to applications for alternative uses, where land is currently developed but not allocated. Paragraphs 128 and 129 set out provisions for achieving appropriate densities – providing clear support for avoiding low densities in areas where there is existing or anticipated shortage of land for meeting identified housing needs. Paragraph 129(C) of the NPPF is relevant and states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies of the NPPF.
- 9.34 In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 9.35 Paragraph 128 of the NPPF states that in respect of development density, consideration should be given to whether a place is well designed and ‘the desirability of maintaining an area’s prevailing character and setting...or of promoting regeneration and change’.
- 9.36 Policy H10 of the LP promotes higher density development in locations with a good PTAL score and in close proximity to a local centre in order to ensure the most efficient use of land and to optimise the provision of housing. The LP incorporates a different approach to assessing density – advocating a design-led approach. LP Policy D3 does not follow a matrix approach providing indicative densities. It instead advocates for the best use of land by following a design-led approach that optimises the capacity of sites. Policy D2 of the LP states that development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels and be proportionate to the site’s connectivity and accessibility by walking, cycling and public transport to jobs and services (including both PTAL and access to local services).
- 9.37 Additionally, Policy D3 refers to optimisation of site capacity to provide a development that is the most appropriate form and land use for the site. It also states that development proposals should respond to form and layout,

experience, quality and character. Furthermore, the policy details that density measures related to the residential population will be relevant for infrastructure provision and measures of density related to the built form and massing will inform its integration with the surrounding context.

- 9.38 Enfield policies CP4 and CP30 of the Core Strategy stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment.
- 9.39 Policy DMD37 calls for a design-led approach to ‘capitalising’ on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity. Policy DMD8 requires proposals be in an appropriate location and of a suitable scale, bulk and massing.
- 9.40 Policy DMD6 promotes density appropriate to the locality – in line with the previously superseded London Plan Policy 3.4 density matrix.
- 9.41 Policy DMD8 which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing. In this instance the proposed development is in an accessible location with a PTAL rating of 3, within close proximity to an overground station and several bus routes.
- 9.42 The testing of height, footprint, quality of dwellings and open space provision, as well as connectivity of the site, infrastructure and development potential has been considered to determine the quantum of the scheme and thus concluded that the proposed quantum, on balance, was considered acceptable.
- 9.43 The scheme, when assessed against adopted density policy, would not result in overdevelopment or excessive density. The scheme would provide 81 residential units across the site. When considering the proposed density in the round alongside the site’s moderate PTAL rating, its acceptable impact on residential amenity and its sufficient social infrastructure, it is considered that the scheme results in an appropriate level of development for the site. Furthermore, the quantum of units proposed is acceptable in its specific local setting, subject to all other material planning considerations being met. In density terms the proposed development is in line with adopted policy both at local and regional level.
- 9.44 Accordingly, considering the above policy considerations, the development proposals represent appropriate land use/future uses in the overall redevelopment of the site and amount to public benefits in support of the proposal, subject to all other material planning considerations being met.

Housing and Affordable Housing

- 9.45 The LP acknowledges the extent of the housing crisis in London. The population is projected to increase by 70,000 a year, reaching 10.8 million by 2041. This means that just to meet demand, tens of thousands of new homes need to be built every year.
- 9.46 The LP provides a ten-year housing target for each of the London Boroughs. The 10-year target for Enfield is 12,460 homes over the period 2019/20 to 2028/29. This identifies a need for a minimum of 1,246 dwellings per year to

be delivered over the next 10 years in the Borough an increase over the previous target of 798.

- 9.47 Enfield's Housing Delivery Test Action Plan 2023 found that in the period 2019/20 to 2021/2022, the Council met 73% of its housing target delivering 995 homes in 2021/22. This is an improvement on the previous year (847 completions) despite challenging market conditions. However, as delivery across three years is 73% of the Government's requirement, the Council is placed in the 'presumption' category. This requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5-year housing land supply which is monitored through the AMR.
- 9.48 Enfield, with close to 40% of the land currently designated as Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south-east growth corridors. These land designations underpin the need to optimise development on brownfield land.
- 9.49 The New Enfield Local Plan (ELP), was published at Regulation 19 Stage between 28 March and 28 May 2024, acknowledges the scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough and to continue to delivery housing growth to 2041.
- 9.50 Taking into account the housing needs of Enfield's population, nationally- and regionally-set housing delivery targets and shortfalls in meeting targets, it is evident that this proposal to provide homes at a high-quality and with a range of housing types is supported by policy, most notably London Plan Policies GG2, GG4, D1, D3, H1, H2 and H11, Core Strategy Policies 1, 2, 44 and 4.1 (Spatial Strategy) and advice contained within the NPPF. As such the Development is supported in principle terms subject to other material planning considerations as outlined below.

Housing mix and tenure

- 9.51 LP Policy H10 sets out that all residential development should generally consist of a range of unit sizes, which should be based on, amongst other things, local evidence of need. Regarding low-cost rented homes, Policy H10 states Boroughs should provide guidance on the size of units required by new development to ensure affordable housing meets identified needs. This should take account of evidence of local housing needs, including the local housing register and the cost of delivering larger units and the availability of grant.
- 9.52 Enfield Core Policy 5 seeks to provide a mix of housing borough wide. The evidence bases to support the unit mix set out in Core Policy 5 dates from 2008. The preferred housing mix in the Core Strategy (based upon local housing need information and market signals) has been updated through the Local Housing Need Assessment 2020 (LHNA), which has been prepared as part of the evidence base to support the preparation of the ELP. This has identified a shifting priority for housing mix that more accurately reflects the needs of the Council's housing waiting list and is an important material planning consideration in context of providing a more up-to-date empirical position.
- 9.53 While it is not adopted policy, Draft Local Plan Policy H3, outlines priority types for different sized units across different tenures.

- 9.54 The proposed breakdown of the 81 residential units would comprise 29 x one bed units (36%), 37 x two bed units (46%) and 15 x three bed units (18%).
- 9.55 Although the overall housing mix is inconsistent with the balance of dwelling types sought by CP5, the proposal would fulfil the aims of LP Policy H10 by providing well-designed one- and two- bedroom units in a suitable location. This would provide opportunities for those in the Borough looking to downsize, enabling larger dwellings elsewhere to become available for new occupiers. In addition, one-bedroom units play an important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes.
- 9.56 The proposed housing mix is considered appropriate, having regard to policies CP5 of the Core Strategy, DMD3 of the Development Management Document and H10 of the LP and the information contained within the Councils Strategic Housing Market Assessment.

Affordable Housing

- 9.57 The NPPF must be regarded in the preparation of local plans and is a material consideration in planning decisions. Annex 2 of 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)”. LP Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable.
- 9.58 Core Policy 3 sets a borough-wide affordable housing target of 40% in new developments, applicable on site capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances, and the mix of affordable housing should reflect the need for larger family units, in accordance with policy CP5 of the Core Strategy. The Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision. However, having regard to the Council’s ‘presumption in favour of sustainable development category’, further weight is attributed to LP policies and the evidence obtained for the emerging Local Plan policy, including the Local Housing Needs Assessment (2020).
- 9.59 According to the Enfield Local Housing Needs Assessment (LHNA), there is a requirement for 1,407 affordable homes annually to address the combined need for affordable/social rented housing (711 homes) and affordable homeownership or intermediate rented housing (696 homes). This points toward a policy approach involving an equal split of 50% for social/affordable rented housing and 50% for intermediate housing.
- 9.60 Policy DMD1 refers to affordable housing comprising three tenures: social rent, affordable rent, and intermediate housing. It states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need.
- 9.61 This current target of 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.

- 9.62 LP Policy H4 recognises that viability might be an issue in certain circumstances. Where a proposal does not meet the affordable housing requirements it is necessary for it to follow the viability tested route. This means the Applicant should supply viability evidence to ascertain the maximum level of affordable housing using the methodology and assumptions set out in the plan and in the Affordable Housing and Viability Supplementary Planning Guidance.
- 9.63 The Applicant has submitted a Financial Viability Assessment (FVA), in place of an Affordable Housing Statement. The appraisals show that both a 100% open market housing provision and a policy compliant affordable housing scheme both produce a deficit. Therefore, the scheme is unable to viably provide any affordable housing in line with planning policy.
- 9.64 The assessment estimates that the proposal delivering 100% Open Market tenure generates a residual land value of negative -£1.95 million from a Gross Development Value (GDV) of £42.10 million and based upon an assumed developer return of £6.25 million. Total costs for delivering the scheme are estimated at £37.80 million.
- 9.65 The proposal delivering 40% affordable housing (32no. units), generates a residual land value of negative -£4,260,223 million from a Gross Development Value (GDV) of £36.43 million and based upon an assumed developer return of £4.44 million. Total costs for delivering the scheme are estimated at £36.24 million.
- 9.66 The reason given within the FVA is due to the low efficiency of the scheme, as a result of the mezzanine floor which includes a large amount of space that is not income producing. While there is an element of commercial space (connected to the ground floor commercial space), the majority is taken up by the play area, creche and multi-purpose communal area as well as the expected core and communal space (hallways etc.).
- 9.67 Given the scheme is unable to viably provide any affordable housing, the proposal would not deliver a policy-compliant level of affordable housing and a tenure split that is in accordance with London Plan Policies H4, H5 and H6.
- 9.68 Being in the category of “presumption in favour of sustainable development”, Enfield’s Development Plan is deemed to be out of date. Further, Enfield’s CP and DMD both exceed the five-year time limit established by NPPF paragraph 33 to review and update plans as necessary. This also means that the evidence supporting these plans is out-of-date. Under these circumstances, it is reasonable to allocate significant weight to the viability of the site in consideration of the present application.
- 9.69 In light of the “tilted” balance that applies, as well as all material considerations, including the site’s viability, the challenges to housing delivery in Enfield, officers accept the proposal without affordable housing.
- 9.70 The legal agreement will secure an early stage and late stage viability review, essentially re-runs of the viability assessment process, but at a later point post-decision and prior to completion of all units. These reviews compare the viability

assessment submitted at the application stage with actual achieved values and costs. Early reviews are usually engaged if a certain amount of progress has not been made onsite within several years, while late reviews can be triggered at the point where a percentage, typically 75% of the units onsite have been let or sold.

Residential Quality and Amenity

- 9.71 Paragraph 135 of the NPPF in “Section 12: Achieving well-designed and beautiful places” 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:
- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁵²; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 9.72 Policy D6 of the LP outlines housing quality and design standards that housing developments must consider ensuring 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 LP provides qualitative design aspects that should be addressed in housing developments.
- 9.73 Alongside this, policies D5 and D7 of the LP 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

- 9.74 Policy D7 of the LP states that at least 10% of dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, and ii) all other dwellings meet

Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 has similar policy objectives. LP Policy D7 sets out that 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'.

- 9.75 A condition shall ensure that where appropriate, 10% of units in the scheme will be reserved as dedicated accessible homes in accordance with the Building Regulation 2010 requirement M4(3): "Wheelchair user dwellings". A condition shall ensure that, where appropriate, all other units shall be designed in accordance with Building Regulation Standards M4(2), "Accessible and adaptable dwellings" to provide for other types of access needs and potential future requirements. On that basis, the proposal would be acceptable in planning policy terms.

Residential quality

- 9.76 All of the units either meet or exceed internal floorspace standards required by policy D6, Table 3.1 of the LP and comply with the qualitative design aspects to be addressed in housing developments required by Table 3.2. All 81 units would meet or exceed Nationally Described Space Standards and would include private balconies and communal amenity space at various upper floor levels. Overall, the units proposed would be served by reasonably sized windows to all habitable rooms, providing adequate outlook, daylight, sunlight and ventilation in the context of an urban location, whilst making efficient use of land in accordance with the advice contained within the NPPF.
- 9.77 In accordance with Appendix 3 of the "London Plan Guidance: Housing Design Standards", the definition of dual aspect is clarified. The provision of bay windows, stepped frontage, shallow recesses, or projecting facades does not constitute dual aspect. Therefore, a total of 12 units (labelled as 'A3' at 1st to 12th floor level - facing east) are considered single aspect. The remaining 69 units would comply with the above definition and be dual aspect.
- 9.78 Dual aspect has multiple benefits including ventilation; outlook; options in areas with poorer air quality or noise generators; and the possibility of a window to the kitchen and bathroom to allow better air movement, moisture and odour control.
- 9.79 In acknowledging this shortcoming, each single aspect unit would be served by reasonably sized east facing windows providing good levels of outlook, daylight, sunlight and ventilation, particularly to the main living areas. In addition, the units would exceed internal floorspace standards required by policy D6 and have access to external amenity space which therefore suggests flexibility when accounting for this shortfall, particularly where the overall quality of accommodation within the development remains appropriate.

Communal Amenity Space

- 9.80 In accordance with paragraph 3.6.9 of the LP, the use of roof areas, including podiums, and courtyards for additional private or shared outside space is encouraged.

9.81 Located externally at the 7th (88.5sqm), 9th (88.9sqm), 11th (62sqm) and 13th (97.9sqm) roof areas, communal amenity space is proposed, equating to 337.3sqm. Whilst this would mean residents at 1st to 6th, 8th, 10th, 12th, 14th to 5th would not have same level access to communal amenity spaces, the quantum, accessibility and functionality of these spaces in general add to the overall quality of the development.

Child Playspace

9.82 LP Policies D6 and S4 seek to ensure that development proposals include suitable provision for play and recreation noting the provision of play space should integrate with the public realm without compromising the amenity needs/enjoyment of other residents and encourage children to play.

9.83 The Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG sets a benchmark of 10 sq.m. of useable children's playspace to be provided per child, with particular emphasis on playspace for children under five years old to be provided on-site. Additionally, LP Policy S4 also recommends that at least 10 sq.m of playspace per child should be provided. In comparison, at a local level Policy DMD73 does not specify a specific amount of space per child, it sets out that developments with an estimated child occupancy of ten or more children will be required to incorporate on-site play provision to meet the needs arising from the development. Also, Policy DMD9 solely refers to amenity space within new developments.

9.84 LP Policy S4.B requires that schemes that are likely to be used by children and young people should:

1. increase opportunities for play and informal recreation and enable children and young people to be independently mobile
2. for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
 - a. provides a stimulating environment
 - b. can be accessed safely from the street by children and young people independently
 - c. forms an integral part of the surrounding neighbourhood
 - d. incorporates trees and/or other forms of greenery
 - e. is overlooked to enable passive surveillance
 - f. is not segregated by tenure

9.85 Whilst indoor space can also have a role in providing sufficient play space for 0–5-year-olds, or providing activities in unsuitable weather, the majority should be external amenity space to allow for access to nature, fresh air, allow for varied uses, manage noise, encourage access and reduce maintenance requirements.

9.86 Indeed, paragraph 3.4 of the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG states 'If children and young people are to have the chance to play out in the fresh air, to be physically active and to socialise with friends and peers, they need access to out of doors space.'

9.87 A total of 181.6 sqm would be required for 18.2 children based on the GLA Population Yield Calculator, the majority of which would be under 11 years old. This figure is an estimation, in the absence Applicant clarification.

- 9.88 The Applicant indicates that children's play space would be provided indoor and outdoor, with details provided as to the nature of play provision outdoor. The indoor playspace would be located at mezzanine level, equating to 282sqm. Outdoor children's play space would be located at the 7th (88.5sqm), 9th (88.9sqm), 11th (62sqm) and 13th (97.9sqm) roof areas, equating to 337.3sqm.
- 9.89 Given the height and form of the rooftops, as opposed to integrated external spaces suitable for its function, significant boundary treatment would be required for appropriate play space. Insufficient information has been provided by the Applicant as to the feasibility of these spaces, nor measures for safeguarding the areas.
- 9.90 Although roofs and terraces can provide an alternative to ground floor open space on constrained sites, these spaces must be safe, large enough, attractive and suitable for children to play. Careful consideration should be given therefore to these options, including the need for supervision and any restrictions that this might put on the use of the facilities. This would also follow the indoor space, which could potentially require significant maintenance and represent a substantial and ongoing operational undertaking, particularly given the mezzanine floor level is effectively given to this indoor offer and the fragility of the scheme viability as a whole.
- 9.91 As such, officers are not persuaded that these spaces lend themselves to suitable childrens playspace and would in place seek a financial contribution in lieu, for the provision or improvement of local children's play space off-site. In addition, a suitable condition would ensure that the rooftops not be used as childrens play space.

Design and Townscape

- 9.92 The National Design Guidance sets out that well-designed places have ten key characteristics which work together to create its physical character and help to nurture and sustain a sense of community. The Guidance further states that these 10-characteristics contribute towards the cross-cutting themes for good design set out in the NPPF. The ten characteristics are as follows:
- a. Context – enhances the surroundings;
 - b. Identity – attractive and distinctive;
 - c. Built form – a coherent pattern of development;
 - d. Movement – accessible and easy to move around;
 - e. Nature – enhanced and optimised;
 - f. Public spaces – safe, social and inclusive;
 - g. Uses – mixed and integrated;
 - h. Homes and buildings – functional, healthy and sustainable;
 - i. Resources – efficient and resilient; and
 - j. Lifespan – made to last.
- 9.93 Additionally, at regional level policies D3, D4, D5, D6, D8, D9, D14, S4, S6, G4 and G5 are relevant alongside local level policies CP30 of the Core Strategy and DMD8, DMD37, DMD39 and DMD43 of the Development Management Document.
- 9.94 Heritage and character have been proactively considered and influenced the overall design and layout of the proposal. The proposal has been subject to extensive pre-application engagement and an independent design review in

2021 on the originally submitted scheme presented to Members at Planning Committee on 19 July 2022, namely the redevelopment of site to provide mixed use residential development, involving the erection of a 21 storey building with double basement, comprising 100 self-contained (private and social residential units), in addition to commercial and retail areas on ground and mezzanine.

- 9.95 The LP 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
- 9.96 LP 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 LP Policy D9. Produced in line with LP Policy D9 however, Policy DE6: Tall Buildings of the Enfield's draft Local Plan (regulation 19) defines this site as being within a tall building area with appropriate heights of 48m. It is acknowledged however that the emergent plan has limited weight at this stage of the plan making process.
- 9.97 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."
- 9.98 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. Both the London Plan and DMD tall building policies are relevant to the proposed development. The policies can be summarised into two key parts:
- Is the proposal in the right location?
 - Is it of high quality?
- 9.99 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. 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.

- 9.100 The proposal is 53m from ground level. This classifies it as a tall building, when applying the definition of a tall building as any part of the building (including roof plant) is 21m or above, thus triggering LP Policy D9.
- 9.101 The proposed development, based on its proximity to public transport and amenities, resulting transformative change and provision of homes where there is a recognised need indicates the appropriateness of a tall building in this location. When assessed against adopted density policy, the scheme would not result in overdevelopment or excessive density, whereby the proposed development would not have a significant detrimental impact on the living conditions of the occupants of nearby residential properties.
- 9.102 A tall building in this location could mark the Brimsdown Station, stepping down in height to the lower context, in particular using setbacks and more human scale development along Green Street to reference the low rise houses to the west. Height is appropriate for this location as it assists with urban wayfinding, marks the transport node and is an inherently sustainable place for density on account of adjacent train station.
- 9.103 LP Policy D9 requires tall buildings to be of exceptional quality, making reference to close, medium and far views and the concept of a “crown, body and base” of the building being distinct components of an exceptional building.
- 9.104 The overall strategy and massing is generally supported. The use of a large-format grid with finer-grained patterns provided by window groupings will produce an interesting, yet not overly complex façade. The treatment at ground level is welcome with a strong base and bays of commercial units activating the street featuring detailed brick portals. This suggests a positive ground floor interface creating a street frontage, whilst the corner of the site at the station represents a characterful corner marking the tip of the site and pointing towards the station.
- 9.105 From an urban design perspective however, there are strong concerns in respect of the remainder of the proposal. The approach from the south along station road is the weakest elevation with a cascade of varied heights reducing the impression of a confident, landmark building that marks the station. Rather than create a distinctive “crown”, the upper element is confused in its character, where the main body of the elevation represents a poor transition, characteristic of an afterthought. Considering this is also a significant and readily identifiable element of the building to the wider area, belies the fact that this building is of exceptional quality.
- 9.106 Further shortcomings are demonstrated with the failure to illustrate the level of detail, materiality and setbacks at upper levels of the building. The lack of a set back of the taller elements, has many outcomes, one is that this likely to cause uncomfortable wind conditions/downdraughts (wind microclimate) at ground level. The lack of information regarding materiality, also has many outcomes, one is that it could result in glare to occupiers and for the train drivers to the east. In both regards, no substantive technical details have been presented by the Applicant.

- 9.107 The proposal is however 53m, which is 4.9m greater than the potentially appropriate height of 48m set out in Policy DE9. Given the building would be visually prominent and indicate a level of importance in the Borough, effectively landmark, it is fundamental for a tall building's quality to be assured at this stage, particularly for one expected to be exceptional. The quality is unclear, and the execution is a concern.

Heritage

- 9.108 Paragraph 195 of "section 16: Conserving and enhancing the historic environment" of the NPPF states that these assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 9.109 In determining application, Paragraph 203 of the NPPF requires local planning authorities to take account of:
- i. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - ii. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - iii. the desirability of new development making a positive contribution to local character and distinctiveness.
- 9.110 Paragraph 209 of the NPPF states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset'. In this instance, the necessary balancing act must be undertaken but considering the loss is of a non-designated heritage asset.
- 9.111 LP Policy HC1 'Heritage conservation and growth' states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
- 9.112 Enfield Policy 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.
- 9.113 The application site is not situated in a Conservation Area nor is it Listed. However, the building constitutes a non-designated heritage asset, derived from its architectural, historic and communal value.
- 9.114 Whilst not nationally recognised by Historic England, it has been recognised by the Council as locally significant. As a result, it does not have statutory

protection, nor would it be afforded the same weight in planning policy as a statutory designated heritage asset such as a listed building for example.

- 9.115 Constructed in 1924, the inter-war public house has changed remarkably little externally since its construction with features such as the timber six-over-six windows, ground floor bay, dentilled eaves, doors and doorcases all still surviving.
- 9.116 The proposal would be visible from a small number of heritage assets including Durrants Park (non-designated heritage asset; LHL Ref: 131) and Hertford Road Cemetery (non-designated heritage asset; LHL Ref: 128) as well as from the shared setting of the Church of St James (Grade II Listed Building).
- 9.117 The proposal would result in the total loss of the non-designated heritage asset. However, the resultant harm needs to be balanced against public benefits.
- 9.118 In this instance the existing building is no longer fit for purpose and would need significant investment and redevelopment to provide a greater or diverse offer to the wider community. The current building is neither attractive to an operator nor commercially viable as a public house or a community facility generally. This has been further demonstrated as a result of marketing, albeit limited, with little interest in the building. Having been vacant for 7 years, it has deteriorated with self-sewn buddleia together with anti-vandalism hoardings detracting from its appearance.
- 9.119 The proposed development would allow for an intensification of use of the site to meet a recognised housing need, namely 81 new residential homes of good quality accommodation. It would provide the opportunity to improve the quality of public realm and experience for local residents.
- 9.120 The proposed development would not have a significant detrimental impact on the living conditions of the occupants of nearby residential properties and could make appropriate provision for local transport infrastructure.
- 9.121 In addition, other public benefits of the proposal are considered to be:
- provision of commercial units suitable for use as range of community facilities
 - enhancement of Brimsdown and Green Street, particularly to address anti-social activity
 - employment opportunities during construction
 - investment into Brimsdown
- 9.122 It is considered that these benefits outweigh the harm to the non-designated heritage asset.
- 9.123 Although visible due to the building's height and consequential widespread visibility, this does not automatically equate to harm to heritage assets within the borough. In this instance, sufficient and proportion mitigation would be to ensure that the proposed building is of the highest architectural quality. Given the overlap of this requirement with LP Policy D9, a scheme which accords with The London Plan should be considered of sufficient design quality to mitigate the impact upon the aforementioned heritage assets. Given the scheme fails to accord with the design standards of the London Plan, the proposal would not outweigh the identified harm to these heritage assets within the borough.

Impact on Neighbouring Residential Amenity

- 9.124 LP Policy D6 states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 9.125 Enfield Policy CP30 seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Policies DMD6 and DMD8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

BRE Guidance - Daylight and Sunlight to Existing Buildings:

- 9.126 In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.
- 9.127 BRE Guidelines paragraph 1.1 states: "People expect good natural lighting in their homes and in a wide range of non-habitable buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by". Paragraph 1.6 states: "The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...".

Sunlight/Daylight and Outlook

- 9.128 The Applicant has submitted a Daylight and Sunlight Assessment (DSA) to identify and examine the impacts of the development upon existing properties and sites with extant planning permissions.
- 9.129 Accounting for the BRE criteria, the following buildings have been incorporated into the assessment:
- Nos.1 to 15 (odd) Brimsdown Avenue
 - Nos.1, 1a, 7, 8, 20, 22, 25, 31 and 40 Jute Lane
 - Nos.2, 4, 6 Osborne Road,
 - No.22 Enstone Road
 - Nos.241 to 257 (odd), 342 to 356 (even) Green Street
 - Nos.29, 31, 38, 40, 42, 44 Goldsdown Close
 - Nos.34, 35, 36, 37 to 44 Stonycroft Close
 - Brimsdown Station House Green Street
- 9.130 The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices. For completeness, buildings identified in the report as non-domestic are:
- 9.131 The ground floors of No.1a Jute Lane and No.249 Green Street

- Nos. 253 and 257 Green Street
- Nos.1, 7, 8, 20, 22, 25, 31 and 40 Jute Lane
- Brimsdown Station House Green Street

9.132 The DSE states that a total of 1039 windows have been tested, of which, 522 have a requirement for daylight.

9.133 Of the 522 windows being either domestic and/or habitable, 27 fall short of the Vertical Sky Component (VSC) test which equates to a pass percentage of 95%.

9.134 The 27 windows that do not pass the VSC test are windows at:

- 243 Green Street
- 256 Green Street
- 354 Green Street
- 352 Green Street
- 359 Green Street
- 37 to 44 Stonycroft Close
- 5 Brimsdown Avenue
- 3 Brimsdown Avenue
- 1 Brimsdown Avenue

9.135 However, for these windows that do not pass, the following mitigating factors are given:

- The results confirm that 7 of 27 aforementioned shortfalls fall marginally short of the recommended VSC target (with before/after ratios of 0.7 and above – against the BRE target of 0.8).
- The BRE guide acknowledges that where a window has an overhang or a projecting wing on one or both sides of it, a larger relative reduction in VSC may be unavoidable, as the building itself contributes to its poor daylighting. The BRE guide explains that one way to demonstrate this is to test the windows without these existing obstructions in place. A total of 7 of the aforementioned shortfalls either surpass or achieve before/after ratios of between 0.69 and 0.79 against the BRE criteria without the wings/overhangs in place.
- Of the remaining 13 windows, 7 maintain a VSC score of 20.5% or more and 6 maintain a VSC score of 15% or more, where a VSC of 20% or more is considered reasonably good, and VSCs in the mid-teens (around 15% or more) have been accepted on the basis that fully optimising housing potential may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

9.136 All windows that face within 90 degrees of due south have been tested for direct sunlight. All windows with a requirement for sunlight, with the exception of Nos. 1, 3, 7, 9, 11 & 15 Brimsdown Avenue and 44 Goldsdown Close, pass both the total annual sunlight hours test and the winter sunlight hours test. However, for these windows (including rooflights) that do not pass, the following mitigating factors are given:

- Many of the aforementioned shortfalls appear to be part of rooms which have additional windows that meet the sunlight recommendations. The net effect of the above, is that because the rooms have windows which meet the BRE recommendations, the loss of sunlight is unlikely to be noticeable.

- The aforementioned shortfalls pass the Annual Probable Sunlight Hours test and only fall marginally short during the winter months. Furthermore, many of these windows achieve Annual Probable Sunlight Hours scores of 24%, only 1% short of the 25% target set out in the BRE guide.
- 9.137 All rooms with a requirement for daylight pass the daylight distribution test.
- 9.138 All gardens and open spaces tested meet the BRE recommendations, receiving at least two hours sunlight on 21st March before and after the development. Where losses do occur, such deviations are not unusual within an urban context. A total of 14 gardens are impacted with between 1-5% of the total area of each garden (sqm) of each garden receiving at least two hours sunlight on 21st March before the development but will receive under two hours sunlight after the development (light loss). Given this affects less than 5% of these gardens this is considered acceptable.
- 9.139 The NPPG states that developments should maintain acceptable living standards and that site location is a relevant factor when considering sunlight/daylight. Furthermore, the NPPF states that authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”
- 9.140 It is noted that there are some rooms which do not meet the recommendations, however given the overall high level of compliance with BRE recommendations, urban location and that there are other sources of light to the rooms affected, on balance the deviations are considered acceptable to provide acceptable living conditions.

Privacy and Overlooking

- 9.141 LP Policy D6 states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing.
- 9.142 The Mayor of London’s Housing SPG does not support adhering rigidly to visual separation measures as they can limit the variety of urban spaces and housing types in the city. Standard 28 of the Mayor of London’s Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 9.143 Enfield Policies DMD6 and DMD8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Additionally, policies DMD6 and DMD8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment. Policy DMD10 is silent on distancing standards for this type of relationship but requiring that development would not compromise adjoining sites.

- 9.144 The application site is a kite shaped plot of land that adjoins public highway land and railway tracks in two of the sides and the flank elevation of the adjoining buildings. As such given its relationship with neighbouring properties it is not considered to have an acceptable impact in terms of privacy, overlooking and overbearing impact for neighbouring properties.
- 9.145 The massing and scale of the proposed buildings would be significantly greater than the existing built form and therefore the impacts to the neighbouring residential amenity levels is of concern.
- 9.146 The area surrounding the site is a mix of commercial and residential uses.
- 9.147 To the southwest of the site is a 2-storey parade (Nos. 245 – 257 Green Street), where the ground floors are commercial in use with the upper floors being residential in use. The residential windows face northwest and southeast and therefore not across or towards the development site to a significant degree.
- 9.148 To the southeast of the site is a 3-storey residential block of 12 flats (Langley Court – No.243 Green Street). The residential windows face east over the railway and west to the rear of Nos. 245 – 257 Green Street, at distance of approximately 20m. A single column of windows within Langley Court looks over the southern end of the development site at a distance of approximately 12-15m. These windows serve habitable spaces.
- 9.149 To the west of the site, across the highway of Green Street are semi detached 2-storey dwellings on Brimsdown Avenue (Nos.1-15) and Green Street (Nos.342-356), at a distance of approximately 28m. Behind Green Street is Goldsdown Close (29,31, 38,40,42,44).
- 9.150 To the north of the site, across the highway of Green Street is the distinctive 4 storey block of 44 flats (No.44 Stonycroft Close) with a dodecahedron shaped footprint, at a distance of approximately 19m.
- 9.151 Any properties sited on the opposite side of Green Street, namely No.44 Stonycroft Close and the semi detached 2-storey dwellings on Brimsdown Avenue and Green Street are afforded suitable mitigation by virtue of the separation provided by the intervening highway.
- 9.152 The properties along Nos. 245 – 257 Green Street and 9 out of 12 flats serving Langley Court, by virtue to their outlook corridor, in addition to the siting of windows and accessible amenity spaces within the development not be subject to potentially harmful overlooking and dominance to these neighbouring properties
- 9.153 The relationship with 3 out of 12 flats serving Langley Court (those located to the northernmost end of the building) means the design of the proposed development needs to respond to the existing context.
- 9.154 Commercial windows at ground floor level would be obscured by way of boundary treatment, secured by condition. At mezzanine floor level, it is considered that 1 out of 2 windows serving the space labelled 'Possible multi purpose Communal area' would require to be frosted and fixed closed to a minimum of 1.8m in height to minimise any potential for overlooking as a result of its proximity at 4m.

- 9.155 Residential windows within the development on the east and south elevations have been sited so as to minimise facing Langley Court, with no windows facing the column of windows at the northernmost end of Langley Court. Where windows at upper floor levels of the development are in proximity (8m+) to this column of windows and share an outlook corridor, these remain indirect and at angles of between 18 and 30 degrees, therefore, extremely oblique.
- 9.156 In addition, the podium roof top area adjacent to Langley Court and Nos. 245 – 257 Green Street is inaccessible for the purposes of amenity use and therefore minimises any potential for overlooking to these neighbouring properties.

Noise and Disturbance

- 9.157 Paragraph 191 of the NPPF sets out that that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life'.
- 9.158 Additionally, at a regional level, LP Policy D14 sets out that in order to reduce, manage and mitigate noise to improve health and quality of life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. At a local level policy DMD68 and CP32 are also relevant.
- 9.159 The proposed residential development is consistent with the existing prevailing mix of residential and commercial uses in the area and it is therefore unlikely that any unacceptable levels of noise would be generated as a result of the nature of uses proposed. Whilst the development would result in the significant intensification of the site, the siting and form of the building and key noise generators such as plant, balconies, windows and vehicle/pedestrian access points are appropriately located to minimise unacceptable levels of noise to neighbouring residential occupiers.
- 9.160 With respect to occupier amenity, it is recognised that most developments in urban areas will be subject to noise levels above the BS8233 recommended levels for balconies. The site is located adjacent to railway lines and therefore requires suitable mitigation measures by way of condition to secure the residential environment and protect residential amenities from noise and disturbance.
- 9.161 It is therefore concluded that the proposed development is considered acceptable in relation to noise levels both internally, and externally in private amenity areas, having regard to policies DMD68, CP32 and LP D14 as well as the guidance contained within the NPPF.

Light Pollution

- 9.162 Whilst it is acknowledged that such a significant development would likely generate more light than the established use as a public house or existing vacant site, an appropriate planning condition could be attached securing details of external light spill and light spill to internal communal areas to safeguard against adverse impacts.

Transport, Access and Parking

- 9.163 LP Policy T1 encourages partnership working in terms of transport and development that reduces the need to travel, especially by car whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy supports measures that encourage shifts to more sustainable modes of transport. LP policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. It is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 9.164 Additionally, LP Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 9.165 Enfield Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced so as to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.
- 9.166 The application site fronts Green Street, to the south of the junction with Mollison Avenue (A1055). The site has a PTAL of 3 which is moderate, being within close proximity to Brimsdown Train Station, however the wider area has a PTAL of 2 which is poor. The site is relatively well served by local bus routes on both Green Street and Mollison Avenue.
- 9.167 The Applicant has submitted a Transport Statement (TS) to understand the likely impacts from the development and any increase in traffic, public transport use and local parking availability.

Car Parking Provision

- 9.168 The site is proposed to be car free, however, it is noted that three disabled off street parking spaces would be provided, accessed via Green Street Crescent. This is considered acceptable, having regard to policy T6.1 of the London Plan.
- 9.169 In the absence of an Applicant provided parking survey, based on census data, it is concluded that car ownership as a result of this development would be approximately 40no. cars. Given the surrounding highway network does not currently have the capacity for such additional on-street parking generated by the proposed development, this would result in an increase in localised congestion and parking pressure.
- 9.170 In addition, the commercial portion of the development would also attract a parking demand that would exceed the available spaces in the locality, resulting in indiscriminate on street parking, which could have short term negative highway safety and traffic flow impacts.
- 9.171 As there is no Controlled Parking Zone (CPZ) or one currently being implemented, residents would not be restricted from parking on the street. This lack of restrictions could lead to unacceptable congestion, which might adversely affect highway safety. Uncontrolled street parking could result in increased traffic congestion, as more vehicles may be parked on the street, reducing the available road space for moving vehicles along Green Street. This can slow down traffic flow and increase congestion, particularly during peak hours and its location adjacent to a level crossing.
- 9.172 Congested streets can also hinder the movement of emergency vehicles such as fire engines and ambulances, potentially delaying response times in critical situations. Additionally, increased street parking can force pedestrians to walk on the road and cyclists to navigate narrower spaces, raising the risk of accidents.
- 9.173 The negative impact extends to public transport as well, as buses and other forms of public transport may face delays due to congested streets, leading to a less reliable service and potentially deterring people from using public transportation. Implementing a CPZ can help manage parking demand, reduce congestion, and enhance safety for all road users by ensuring that parking is controlled and orderly.

- 9.174 Several residents have objected due to the current parking pressures and the fact the site is not within a Controlled Parking Zone (CPZ) means that on street parking pressures may still increase as a result of the development.
- 9.175 A CPZ is an area where on-street parking is restricted during specified times. The controlled hours are shown on entry signs, with bays marked within the zone to show where parking is permitted and yellow lines to show where it is not. Permits are required to park within the designated bays and are available for residents within the zone, as well as their visitors and carers. In some cases, permits are also available for businesses with the zone.
- 9.176 There are a number of variations to CPZs, including Restricted Parking Zones and Permit Parking Areas. All are based on some form of zonal control, with a permit needed to park during the restricted hours.
- 9.177 Approximately 15% of Enfield is covered by a CPZ. These are mainly focussed on town centres and other major trip attractors (such as hospitals) and rail and underground stations.
- 9.178 Generally, the existing CPZs fall into one of two broad categories, either 'all-day' controls around town centres or hospitals etc, or 'part-day' controls, typically designed to deter commuter parking around stations.
- 9.179 As part of this development, the introduction of a CPZ within the locality, could mitigate these impacts by preventing all-day commuter/service parking, improving highway safety and reducing inconsiderate and indiscriminate parking, reducing the number of vehicles circulating in and around the area looking for parking spaces, leading cumulatively to a reduction in congestion, noise and air pollution.
- 9.180 In order to implement a CPZ, this would nominally reduce on-street parking spaces in the locality by removing parking from corners and pinch-points and result in the possible displacement of parking to nearby uncontrolled roads. Therefore, the size of the CPZ would have to be sufficient to prevent the occupants of this development wanting to own a vehicle due to the inconvenience of having to park outside the zone. Based on Institute of Highway Engineers, this would be between 400m-800m, about 10-15 minutes' walk.
- 9.181 The costs associated with the implementation of the CPZ would be borne by the Applicant. Dependent of the size of the CPZ, the fee estimate would be between £24,500 – £189,000.
- 9.182 Any contributions towards a CPZ would be consulted on with local stakeholders and would mitigate the impact of the proposed development. Officers are therefore comfortable with the development being car and permit free if the site is included as a CPZ. On that basis, this would need to be secured via a legal agreement.

Vehicular Access

- 9.183 Access to the three disabled off street parking spaces would be via the existing access from Green Street. Retaining the existing access is acceptable in principle, and tracking shows that the bays can be accessed and egressed in a forward gear.

- 9.184 The submitted plans show three additional bays, two marked as “Possible Drop off Zone” and one as ‘P’. By virtue of their siting, visibility to pedestrians and oncoming traffic are considered unsuitable and a permitted scheme would require their exclusion as a parking space by way of an appropriate condition.

Delivery and Servicing

- 9.185 Policy T7 of the London, Plan states that a Delivery and Servicing Plan (DSP) should be provided to ensure that proposals facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 9.186 The proposal indicates that limited ground floor circulation space for vehicles suggests an impediment for servicing to take place off-street. The TS therefore suggests on-street parking, on the basis that the forecasted trip generation for two commercial units of this scale are considered very low. Servicing on-street however, has the potential to increase localised congestion and parking pressure, particularly waste and refuse.
- 9.187 To mitigate this matter, the public highway directly adjacent to the site on Green Street could incorporate a loading bay (including a traffic management order), at the Applicant’s expense. The highway works would be undertaken by Enfield’s highways contractor and therefore requires a highways contribution secured by way of a legal agreement/planning obligation. This would ensure suitable deliveries and servicing can be undertaken on site, in accordance with policies DMD48 of the DMD and T7 of the London Plan (2021).

Cycle Parking

- 9.188 The proposal would provide 112 internal cycle spaces and 56 external cycle spaces. The external spaces are not secure and covered and would not therefore be appropriate for the long stay parking (commercial or residential). As a result, the proposal sees the under provision of long stay spaces required by 31. A suitable condition however could require a portion of the external spaces to be secure and covered that would provide a more appropriate balance.

Trip Generation

- 9.189 Whilst vehicle journeys are unlikely to have an impact on the traffic, it is important to note that other travel modes (pedestrian, bicycle, bus, train) will also increase and could have an impact on local infrastructure.
- 9.190 In terms of Trip Generation, the submitted TS outlines the anticipated trip generation of the site using survey information obtained via the Trip Rate Information Computer System (TRICS) database. It is considered the forecasted trips presented for servicing and pedestrian vehicles are lower than anticipated, however, given that the development would be car free, supported by the introduction of the CPZ, the majority of trips would be by other modes than single occupancy car trips.
- 9.191 With regard to pedestrian, bicycle, bus and train trips as a result of the development, it is considered that these impacts can be reasonably accommodated on existing transport networks and services.

Construction Logistics Plan (CLP)

- 9.192 A Construction Logistics Plan is required in accordance with TfL's latest guidance. However, an appropriate condition could be attached outlining the construction logistics strategy and programme of works for the site. This is to ensure suitable construction works can be undertaken on site, without detrimentally impacting the surrounding road network, in line with LB Enfield DMD Policy 48 and the London Plan (2021) Policy T7.

Travel Plan

- 9.193 The development proposals do include measures to encourage and promote sustainable and active travel and these include the provision of car-free development; and the provision of cycle parking spaces to London Plan standards. To ensure that measures and targets are in place to encourage and promote sustainable travel to and from the site, a full residential Travel Plan could be secured by legal agreement, should the scheme be granted. The Applicant would be expected to instruct an independent transportation data collection company to undertake the monitoring survey.
- 9.194 To ensure that the proposed development is acceptable in terms of its impact on the local transport network, a package of measures/contributions as mentioned above and secured by legal agreement are required. This would include a car club, cycle infrastructure, travel plan, pedestrian infrastructure, parking surveys at £90,000.

Habitat Regulations Assessment

- 9.195 Both Strategic Access Management Measures (SAMMs) and Suitable Alternative Natural Greenspaces (SANGs) would be payable on this scheme to mitigate the harmful impacts by visitors to Epping Forest, designated as a Special Area of Conservation (SAC).
- 9.196 The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation.
- 9.197 The Council's recently adopted SANG strategy relates to residential development which is granted planning permission after 1st April 2024. It is applicable to the proposed development. As such for Class C3 residential uses, SAMMs is charged at £45.40 per dwelling and SANGs is charged at £353 per dwelling and there is a £90 administration charge.
- 9.198 Based on current details of 81 dwellings, the SAMM contribution owed is approximately £3,677. The amount of SANGs contribution owed is £28,593. The total contribution is £32,270, in addition to the administration fee of £180.
- 9.199 As such, the Local Planning Authority, as the competent authority, are satisfied with the mitigation measures incorporated. As such any impacts on the Epping Forest SAC would be appropriately mitigated.

Open Space, Landscaping and Trees

- 9.200 LP Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.
- 9.201 Enfield Policy DMD80 stipulates developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation, and reducing the urban heat island effect. Additionally, Policy DMD81 refers to landscaping.
- 9.202 The landscaping strategy indicates 25 urban trees would be planted to compensate for the loss of the 5 urban trees on site. It has been assessed that small, native trees of moderate condition at upper floor levels (1st, 7th, 9th, 11th, 13th and 16th roof) would be achievable in this setting, along with shrubs, flower beds, and grass to be introduced on different levels. Of the 5 urban trees present on site, 4 are semi-mature sycamore and one is a semi-mature common lime, all in good health and of medium to low amenity value.
- 9.203 Policy DMD80 specifies that all development that would result in the loss of, or harm to trees of significant amenity or biodiversity value should be refused. Additionally, where there are exceptional circumstances to support the removal of such trees, adequate replacements must be provided.
- 9.204 It is accepted the loss of 5 urban trees, none of which are designated by a Tree Preservation Order, would be necessary to facilitate this form of development in this location. To offset the loss of existing trees, the planting of 25 trees proposed represents a significant net increase, particularly in terms of habitat value, outweighing the proposed loss of medium and low amenity value trees.
- 9.205 It is considered appropriate to secure a detailed tree planting and landscaping strategy to secure adequate replacement tree planting in the interests of Green Infrastructure, hard and soft landscaping which contributes to the visual amenity and character of the area and off-site tree protection measures during construction.

Biodiversity and Ecology

Ecology and Biodiversity

- 9.206 Paragraph 185 of the NPPF in "Section 15: Conserving and enhancing the natural environment" requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks.
- 9.207 LP Policy GG2 requires development to 'protect and enhance...designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.

- 9.208 Enfield Policy 36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. DMD Policy 78 makes clear 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.
- 9.209 The Applicant has provided a Preliminary Ecological Appraisal (PEA) to assess the site's ecological baseline and identify constraints and opportunities associated with development at the site. The main findings of the PEA are:
- The site comprises developed land; sealed surface in the form of an old public house with associated outbuildings and carpark and urban trees. The most notable habitat feature is the urban trees.
 - The site is located more than 100m from woodland, hedgerows, and water. However, the railway to the east could provide a suitable commuting corridor for bats in the area, as it is unlit, and the embankments are vegetated.
 - The site lies approximately 780 metres east of the site of the Chingford Reservoirs Site of Special Scientific Interest (SSSI), a Statutory Designated Site.
 - The site lies within the 6.2-kilometre catchment zone of the Epping Forest Special Area of Conservation (SAC) and SSSI, a Statutory Designated Site. Epping Forest SAC and SSSI is located three kilometres east of the site at its closest point.
 - The Lea Valley (SINC), a Non-Statutory Designated Sites, is located approximately 730 metres to the east of the site
- 9.210 There are three buildings located on-site comprising the main former public house building. The remainder of the site comprises areas of hardstanding formally used for parking around the buildings.
- 9.211 Five urban trees are present on site, four of which are sycamore and one common lime.
- 9.212 The habitats at the site have low to negligible ecological value with urban trees having relatively higher ecological value.
- 9.213 In respect of the buildings to suitability support roosting bats, one is high, one is low, and one is negligible. The trees on site were assessed as offering negligible potential to support roosting bats due to a lack of potential roosting features. The site is assessed as having negligible suitability to support foraging and commuting bats.
- 9.214 The habitat on site is unsuitable for otter, badger, hazel dormouse, water vole, reptiles, great crested newt (highly unlikely to occur on site) and invertebrate.
- 9.215 The scheme incorporates wildlife planting (trees, shrubs, areas of grass and permeable paving), a green roof, and provision of bird and bat boxes to contribute to improved biodiversity at the site.

- 9.216 The submitted Biodiversity Net Gain factors in the loss of habitat units across the site. Based on these calculations, the development results in a 28.73% net gain in Biodiversity with significant green roofs, in line with policy.
- 9.217 Having regard to the requirements outlined in the NPPF (Para 170), policies GG2 and G6 of the London Plan and policy CP36 of the Core Strategy, it is concluded that the following appropriate conditions could be attached to secure biodiversity enhancements at the site, new native species planting within a significant and biodiverse green roof landscaping scheme enhance the site for bats through the provision of integrated bat boxes within the proposed new building enhance the site for swifts through the provision of three integrated bird boxes per elevation within the proposed new building. Tree removal should be undertaken outside of the breeding season of March to September inclusive. If this is not possible, an ecologist should be present immediately prior to removal to check the trees. Also to be secured are the Biodiversity net gain enhancements of 28.73% (which could be secured within a legal agreement).

Sustainability and Climate Change

- 9.218 The NPPF maintains the presumption in favour of sustainable development, including environmental sustainability, where Paragraph 157 of the NPPF in “Section 14: Meeting the challenge of climate change, flooding and coastal change” requires planning to support the transition to a low carbon future in a changing climate, shaping places in ways that contribute to radical reductions in greenhouse gas emissions, minimising vulnerability and improving resilience; encouraging the reuse of existing resources, including the conversion of existing buildings; and supporting renewable and low carbon energy and associated infrastructure.
- 9.219 LP Policy G1 acknowledges the importance of London’s network of green features in the built environment and advocates for them to be protected and enhanced. The Policy notes that green infrastructure ‘should be planned, designed and managed in an integrated way to achieve multiple benefits’. Also of relevance is Policy G6 requires developments to manage impacts on biodiversity and secure a net biodiversity gain.
- 9.220 Paragraph 159 of the NPPF requires new developments to ‘be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design’.
- 9.221 Enfield Council’s Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health.
- 9.222 Meanwhile the LP and Enfield Issues and Options Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

Energy and Sustainability

- 9.223 Currently, all residential schemes are required to achieve net zero carbon with at least an on-site 35% reduction in carbon emissions relative to Part L of 2021 Building Regulations.
- 9.224 Paragraph 162 of the NPPF in “Section 14: Meeting the challenge of climate change, flooding and coastal change” 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.
- 9.225 LP Policy SI2 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).
- 9.226 Enfield Local Plan Policy DMD Policy 51 calls for energy efficient buildings as the first step in applying the energy hierarchy, DMD 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 not met. The Council published the Enfield Climate Action Plan in July 2020.
- 9.227 The Applicant submitted an Energy and Sustainability Statement (Part L of 2013 Building Regulations) calculating the carbon emissions generated by the new development, and the impact on carbon reduction of the measures that are implemented onsite alongside the LP and relevant Enfield policy requirements.
- 9.228 At the ‘Be Lean’ stage - use less energy and manage demand during operation, the proposal would see the residential portion with a 0.68% reduction, whilst the commercial portion of the scheme would see a 1.89% reduction in CO2 emissions from the development, producing a site wide reduction of 0.95% The reduction targets would fall short of the 10% target for residential developments and 15% for non-residential developments.
- 9.229 At the ‘Be Clean’ stage - exploit local energy resources, connection to a heating network local to the proposed development has been considered. The application site is located in an area where district heating is not expected to be implemented in the future. Alternatively, a site-wide heat network is proposed with a single energy centre supplied by communal gas boilers. However, based on the strategy presented, no savings are made at this stage.
- 9.230 At the ‘Be Green’ stage - maximise opportunities for renewable energy by producing, storing and using renewable energy on-site, the renewable technologies feasibility study carried out for the development identified air source heat pumps and roof mounted photovoltaic panels as suitable technologies for the development. The proposal would see the residential portion with a 52.03% reduction, whilst the commercial portion of the scheme would see a 54.91 % reduction in CO2 emissions from the development, producing a site wide reduction of 52.67%.
- 9.231 To achieve ‘zero carbon’ for the development, 50.8 tonnes per annum of regulated CO2, equivalent to 1,502.4 tonnes over 30 years should be offset offsite. At a cost of £95 per tonne of CO2, this equates to a total offset payment

amount of £142,728.00 which could be secured within a legal agreement. Such contributions would be pooled, and ring fenced into a carbon fund, to deliver carbon reduction projects across the borough, in line with Policy DMD54.

- 9.232 The strategy concludes that the proposed development is expected to reduce on-site regulated carbon emissions by 53.62% against a Part L 2013 regulations and thus complies with the 35% reduction required by the London Plan.
- 9.233 Secured alongside an appropriate condition for BREEAM 'Excellent', a condition is recommended to require an update to the Energy and Sustainability Statement to reflect the newer Part L 2021 regulations prior to the commencement of development.
- 9.234 The legal agreement would also need to account for any potential changes required to the total offset payment. In addition, a feasibility assessment would be required for a DEN connection.

Noise and Air Quality

- 9.235 Paragraph 109 of the NPPF in "Section 9: Promoting Sustainable Transport" recognises that development proposals which directly address transport issues and promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 9.236 LP Policy SI 1 sets out the requirements relating to improving air quality.
- 9.237 These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution.
- 9.238 Furthermore, The Mayor of London's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance seeks to reduce emissions of dust and specific particulate matter from construction and demolition activities in London.
- 9.239 Enfield Local Plan Core Policy 32 seeks to improve air quality by reducing pollutant emissions and public exposure to pollution while Local Plan Policy DMD 65 requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible
- 9.240 To ensures that adequate protection is provided for future residents by minimising noise impacts, suitable planning condition should be applied to ensure the Council's noise requirements will be met including details of the noise attenuation of the proposed glazing. The whole of London is a low emission zone for non-road mobile machinery and an appropriate condition is also called for to address this.

Contaminated Land

- 9.241 Paragraph 189 of the NPPF in "Section 15: Conserving and enhancing the natural environment" requires planning policies and decisions to ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

- 9.242 The development site is in close proximity to industrial land, several of which host current and historical potentially contaminative land uses. As a result, there is the potential for contaminants including heavy metals, petroleum hydrocarbons, fuel oils, phenols, and volatile organic compounds (VOCs) to have leached into underlying shallow soils and groundwater which presents a risk to human health.
- 9.243 The Applicant has submitted a desktop study (Contaminated Land Risk Assessment - CLRA) to provide a qualitative assessment of the risks to current and future occupants and the wider environment from any contamination which might be present on or in close proximity to the development site. The CLRA identified sources of contamination that warrant further investigation; therefore, it is advised that appropriate conditions to mitigate these risks would be required prior to commencement of development. Appropriate conditions would include:
- the recovery of soil and groundwater samples from a site to analyse if contamination is present,
 - a remediation strategy, rendering the site 'fit for purpose'
 - Once the remedial measures set out in the remediation strategy have been met, verification would be required to demonstrate no risk remain

Fire Safety

- 9.244 Policy D12 of the requires developments to be designed to incorporate appropriate features to reduce the risk to life and Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users. The Applicant submitted a
- 9.245 A Fire Strategy produced by a BWC Fire Limited, has been submitted as part of the application to satisfy policy D12 of the London Plan.
- 9.246 The statement makes references to means of warning and escape, internal fire spread, external fire spread and access and facilities for the fire service. Policies D5 and D12 of the London Plan refer to specific considerations, which have been considered as part of this document. These include evacuation lifts, building construction method, means of escape, features which reduce the risk to life, access for fire service personnel and equipment and record keeping.
- 9.247 Although the escape strategy departs from the relevant Building Regulations, as it is based on persons leaving a staircase crossing an external terrace and re-entering a different staircase, it would be reasonable for this matter to be secured by way of condition, to the extent that it affects land use planning. This element would still require separate approval from Building Regulations and, if changes were required as a consequence, it would be for the Applicant to subsequently amend the planning permission.

Flood Risk and Drainage

- 9.248 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal erosion.
- 9.249 The Environment Agency (EA) have a range of responsibilities:

- Providing flood risk advice to LPAs regarding development proposals in Flood Zones 2 and 3.
- Managing fluvial and coastal flood risk by carrying out works.
- Issuing and operating flood warning systems.
- Facilitating works on or near main rivers, and works affecting watercourses, flood and sea defences and other structures protected by its byelaw by issuing consent.
- Providing advice on development proposals.

- 9.250 All boroughs within London are Unitary Authorities and deliver the Lead Local Flood Authorities (LLFA) role for their respective administrative areas. LLFAs have the lead operational role in managing flood risk from surface water, ordinary watercourses and groundwater sources. The London Borough of Enfield will therefore have the following responsibilities:
- Developing, applying, maintaining and monitoring strategies for local flood risk management, including being involved in the preparation of SFRAs.
 - Preparing and maintaining a Preliminary Flood Risk Assessment, flood hazard maps, flood risk maps and flood risk management plans.
 - Designating structures and features that may have an effect on local flood or coastal erosion risk.
 - Investigating and reporting flood incidents (that reach a certain threshold).
 - Creating policies and guidelines to ensure that flood risk management work is effective.
 - Providing advice on major development proposals with surface water drainage implications
 - Regulation and enforcement of works on ordinary watercourses.
- 9.251 Paragraph 165 of the NPPF in “Section 14: Meeting the challenge of climate change, flooding and coastal change” directs that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 9.252 Policy S112 of the London Plan requires developments to ensure flood risk is minimised and mitigated and that residual risk is addressed.
- 9.253 Additionally, London Plan Policy S113 relate to sustainable drainage whereby the preference is to reduce surface water discharge from the site to greenfield run off rates.
- 9.254 Supporting these principles is Enfield Development Management Document Policy DMD 61 which requires a drainage strategy to be produced that demonstrates the use of Sustainable urban drainage systems (SuDS) in line with the London Plan discharge hierarchy. The policy requires the use of SuDS to be maximised with consideration given to their suitability, achieving greenfield run off rates, the SuDS management train and to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value.
- 9.255 Alongside the above policy, Enfield sets out further advice in its Local Flood Risk Management Strategy which outline strategies for the mitigation of flood risk, management of surface water including the implementation of SuDS on new developments, with allowances for the impact of climate change.

- 9.256 The guidance recommends that the relevant documents are:
- 1) Preliminary Flood Risk Assessment
 - 2) Surface Water Management Plan
 - 3) Strategic Flood Risk Assessment (Levels 1 & 2)
 - 4) Local Flood Risk Management Strategy
 - 5) Sustainable Drainage Design and Evaluation Guide.
- 9.257 Finally, the Construction Industry Research and Information Association (CIRIA) 'The SuDS Manual' 2015 (C753) includes up-to-date research, industry practice and guidance in relation to delivering appropriate SuDS interventions including information on measures to deliver cost-effective multiple benefits relating to technical design, construction and maintenance of SuDS systems.
- 9.258 The number of properties at risk of flooding in Enfield is high compared to most other local authorities. This is mainly due to the geography and layout of Enfield.
- 9.259 Consequently, a wide range of flood defence systems are required to manage flooding and ensure that Enfield's residents and businesses are not faced with unacceptable risks or disruption. These defences include all aspects of the drainage network from simple road gullies to large channelised rivers, floodwalls and flood storage areas.
- 9.260 The most significant sources of flooding in Enfield are main rivers and surface water.
- 9.261 River (fluvial) flooding can be caused by rain falling far away from the location where flooding actually occurs. The rate of onset of flooding depends on the size and nature of the river catchment.
- 9.262 Surface water flooding occurs when intense rainfall generates runoff that overwhelms the drainage system leading to ponding and overland flows. Consequently, surface water flooding can be highly localised, and the onset of flooding is rapid.
- 9.263 Although these flood types are managed separately, it is important to note that they are all inter-related – surface water drains into sewers, sewers and ordinary watercourses flow into main rivers, rivers flow in and out of reservoirs, and so on. Therefore, management of the overall system must account for these various interactions.
- 9.264 The development site is at risk of fluvial flooding during a 1% annual exceedance event (AEP) with a 17% allowance for climate change. Taken from detailed flood modelling completed for the Level 1 Strategic Flood Risk Assessment (2021).
- 9.265 However, the site is at high (highest) risk of surface water flooding, with a chance of flooding of greater than 3.3% each year. This does not automatically preclude development. It simply mandates a more thoughtful, proactive approach toward the design and construction processes. By considering flood risks upfront, developments can be functional but also resilient in the face of potential flood events.
- 9.266 The Applicant has submitted a Flood Risk Assessment which has been reviewed by Enfield Council, as the LLFA.

- 9.267 The submission indicates that underground tanks will be provided underneath the building footprint for flood compensation. Flood water would enter the underground tanks via vertical shafts from ground level, controlled by automatic louvre (mechanical flood barriers).
- 9.268 Above ground green infrastructure SuDS such as swales, rain gardens and wetland features not only provide a sustainable way to provide flood compensation, but also enhance the aesthetic value of surrounding area and could contribute to improving air quality and well-being. Below ground measures, such as underground storage tanks, provide an unsustainable flood storage system only. In this context, the strategy fails to align with the drainage hierarchy in the London Plan which requires above ground systems to be considered first.
- 9.269 Enfield Council considers any asset that has the potential to cause flooding through individual failure to be significant. Therefore, large assets such as underground tanks with mechanical flood barriers are considered to be significant. This method of underground tanks and associated mechanical barriers, its operation and maintenance are at potential risk of failure and is therefore not supported by the LLFA or the EA.
- 9.270 To ensure developments do not increase flood risk elsewhere it is important that flood storage is not reduced on site. Buildings or structures can displace flood waters and increase flood risk to neighbouring sites for both fluvial and surface water flood events. To prevent this, level for level flood compensatory storage must be provided on site for the 1 in 100 year (plus climate change allowance). The volume of flood compensation required will be based on the flood level and footprint of the proposed buildings/structures. This should be calculated from the most recent modelled data and analysed with a detailed topographical survey of the site area. The required compensation has been calculated from incorrect modelled data, as is therefore inadequate. The compensation required, based on the 1 in 100 year (plus climate change allowance) flood level, is significantly greater than estimated. Therefore, the mitigation measures would be highly susceptible to being overwhelmed, leading the building to be highly susceptible to flooding when an event occurs.
- 9.271 The predicted flood level is 15.87m above ordnance datum (AOD), which means the height of the building above the standard mean sea level. The strategy however, having used incorrect modelled data and return periods (estimated average time interval between events of a given magnitude), predicts 15.31mAOD. Therefore, the low floor levels of the building would be highly susceptible to being overwhelmed and flooded when an event occurs.
- 9.272 Given the significant risk, the shortcomings of the strategy are compounded with a 'Flood Evacuation Plan' which fails to demonstrate a suitable "Very Low Hazard Level" evacuation route against the EA's Flood Risk Assessment Guidance for New Development (FD2320).
- 9.273 The development, as a result of the built form and strategy detrimentally reduces flood storage on site and would not provide level for level flood compensation on site.
- 9.274 The strategy indicates an increased discharge rate of 1.5L/s, above the Greenfield runoff rate (The rate of runoff that would occur from a site in its undeveloped - and therefore undisturbed - state) of much less than 1L/s discharge rate. Increased surface water runoff is the main cause of higher flood

risk in urban areas. Consequently, measures that seek to reduce runoff rates, either by enabling more infiltration or providing storage of excess water such as green roofs, permeable paving and rainwater harvesting that mimic natural drainage systems, are the most effective techniques of managing flood risk, but have not been suitably accounted for in this strategy. This would reduce the rate and volume of surface water runoff and therefore the risk of flooding further downstream. Therefore, well-designed SuDS are fundamental to a scheme of this size and susceptibility to flooding.

- 9.275 As a result, the proposal would represent a flood risk for the occupiers of the site and an increased flood risk for its neighbours and this part of Enfield.
- 9.276 Paragraph 55 of the NPPF makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests:
- necessary;
 - relevant to planning;
 - relevant to the development to be permitted;
 - enforceable;
 - precise; and
 - reasonable in all other respects.
- 9.277 Any proposed condition that fails to meet one of the above should not be used. This applies even if the Applicant suggests or agrees to it, or it is suggested by the members of a planning committee or a third party. In addition, conditions which place unjustifiable and disproportionate financial burdens on an Applicant will fail the test of reasonableness.
- 9.278 Where it is justified, the ability to impose conditions requiring submission and approval of further details extends to aspects of the development that are not fully described in the application. Conditions that unnecessarily affect an Applicant's ability to bring a development into use, allow a development to be occupied or otherwise impact on the proper implementation of the planning permission should not be used.
- 9.279 In this instance, the imposition of conditions to provide an appropriate and complaint mitigation strategy requiring the fundamental amendment to the scale, form, location and siting of the structure and site would place unjustifiable and disproportionate financial burdens on the Applicant and thereby unnecessarily affect the Applicant's ability to bring the development into use.
- 9.280 In the absence of an appropriate condition that would meet Paragraph 55 of the NPPF to secure these matters, this becomes a reason for refusal.
- 9.281 The proposed development, in the absence of an adequate flood risk assessment and sustainable drainage strategy, fails to demonstrate how proposed measures manage the risk of flooding and utilise Sustainable Urban Drainage Systems (SuDS) following the drainage hierarchy in the London Plan, contrary to Section 14 of the National Planning Policy Framework (2021), Policies SI 13 of the London Plan (2021), CP21 and CP28 of the Enfield Core Strategy (2010), DMD59, DMD60, DMD61, DMD62 of the Enfield Development Management Document (2014) and the New Enfield Local Plan 2041: Level 1 Strategic Flood Risk Assessment (2021).

Socioeconomics and Health

- 9.282 Government Guidance requires public health to be taken into account in accordance with guidance outlined in the National Planning Policy Framework (NPPF).
- 9.283 Paragraph 91 of the NPPF in “Section 8: Promoting Healthy and Safe Communities” requires planning policies and decisions to aim to achieve healthy, inclusive and safe places and beautiful buildings that ‘promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.’

Health

- 9.284 The London Plan advises in “Policy GG3; Creating a Healthy City” that: “those involved in planning and development must assess the potential impacts of development proposals on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments (HIAs)”.
- 9.285 HIAs provide a systematic approach for assessing the potential impacts of development on the social, psychological and physical health of communities. Ensuring issues are considered at an early stage in developing planning proposals can lead to improvements in both the physical and mental health of the population. HIAs are designed to consider whether a development proposal might reinforce health inequalities and inadvertently damage people’s health, or actually have positive health outcomes for the local community.
- 9.286 The Applicant has submitted an HIA to establish a clear and transparent process for screening a development proposal’s possible impacts in key areas:
- Access to healthcare and other social infrastructure: in particular the number of practices such as dentists and GPs within 3km of the proposed development and how many are accepting new patients. Also, the number of social clubs including amateur sporting clubs and associations.
 - Access to open space and nature: the number and size (hectares) of local parks and accessible green spaces within walking distance of the proposed development, including allotments and playing areas for children.
 - Access to education: the number of schools, both primary and secondary within 2km of the proposed development.
 - Health indicators: that health and wellbeing levels at and immediately around the site are quite good compared to London averages. This is an advantage for future residents at the proposed development and needs to be maintained by the development.
 - Crime reduction and community safety: According to the crime statistics, the area is slightly above the Enfield average. The proposed development will incorporate elements to help design out crime.

- 9.1 The assessment indicates that the proposal would have neutral and positive overall impacts on the surrounding area, with the residents of the proposed development expecting the same. The assessment fails to identify three of the GP practices accounted for have since relocated to the Alma Healthcare Centre and many are operating at or close to capacity. It is advised that an estimated financial contribution of £63,700, in accordance with the NHS HUDU Planning Contributions Model, would be needed to mitigate the impact of the development on healthcare, as new residents would require access to primary, community and secondary healthcare services. The financial contribution would be directed towards increasing the capacity of local GP practices.
- 9.287 The financial contribution of £63,700 would be secured via a legal agreement, subject to an updated figure based on population uplift as a result of this development prior to the commencement.
- 9.288 Taking the above into consideration, the development would result in neutral and positive overall positive impacts on the surrounding area, with the residents of the proposed development expecting the same. The proposed development achieves key policy requirements and standards, delivering a scheme which is considered a 'healthy' development that can positively influence health and wellbeing.

Jobs and Employment

- 9.289 LP London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-use phases.
- 9.290 Enfield Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 9.291 To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that employment and skills obligations in accordance with the S106 SPD are secured with the legal agreement.

Education

- 9.292 London Plan Policy S3 seek to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand. Local Plan Core Policy 8 supports and encourages provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. The proposed development is estimated, in the absence of Applicant confirmation, to provide for 159 residents, of which approximately 18 are estimated to be 19 or under. The S106 SPD indicates a contribution sum (£2,535) for each place would therefore be required, secured by way of a legal agreement.

Security and Safety

- 9.293 LP Policy D11 Part C states that development should include measures to design out crime. The policy states that these measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
- 9.294 Appropriate conditions are recommended to ensure that Secure by Design accreditation is achieved prior to the occupation of the development.

Waste and Recycling

- 9.295 Paragraph 20 of the NPPF in “Section 3: Plan Making” refers to the importance of waste management and resource efficiency as an environmental objective.
- 9.296 LP SI7 encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste.
- 9.297 Enfield Core Policy CP22 (Delivering Sustainable Waste Management) of the Core Strategy sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.
- 9.298 The Applicant has submitted a Site Waste Management Plan (SWMP) estimating waste streams generated during demolition, excavation and construction stages of the site works, and set out recommended procedures for the minimisation of construction waste. As this SWMP has been prepared during the concept design stage, the waste volumes set out in this plan constitute estimates, predictions and projections based on design information, as well as industry benchmarks.
- 9.299 It is advised that appropriate conditions accounting for Paragraph 7.50 of the North London Waste Plan (NLWP) be required prior to commencement of development. Appropriate conditions would include procedures for the minimisation of construction waste consistent with the principles of the waste hierarchy: reduce; reuse; recycle; recover.

Public Sector Equalities Duty

- 9.300 In line with the Public Sector Equality Duty the council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions including decision making on planning applications. These considerations include eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9.301 The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above. In making this recommendation, due regard has been given to the Public Sector Equality Duty and the relevant

protected characteristics (age, disability, gender reassignment, marriage / civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

- 9.302 When determining the planning application (and thereby accounting for the representations resulting from public consultation), the Council has considered the potential effects of the proposed development on those with protected characteristics as defined under the Equality Act 2010. In doing this, the Council has had due regard to equality considerations and attribute appropriate weight to such considerations. In providing the recommendation to Members that planning consent should be granted, officers have considered equalities impacts in the balance, alongside the benefits arising from the proposed development. The Council has also considered appropriate mitigation to minimise the potential effects of the proposed development on those with protected characteristics.
- 9.303 There are no statutory or regulatory requirements for the form or content of an equalities assessment. The scale and significance of such impacts cannot always be quantified, and it is common to address this through descriptive analysis of impacts and identifying whether such impacts are adverse or beneficial. The key elements of the Proposed Development which have an impact that could result in an equalities effect include the design and physical characteristics of the proposals subject to the planning application. Officers do not consider there would be a disproportionate equalities effect.
- 9.304 In line with the Human Rights Act 1998, it is unlawful for a public authority to act in a way which is incompatible with a Convention right, as per the European Convention on Human Rights. The human rights impact has been considered, with particular reference to Article 1 of the First Protocol (Protection of property), Article 8 (Right to respect for private and family life) and Article 14 (Prohibition of discrimination) of the Convention.
- 9.305 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest. The recommendation is considered appropriate in upholding the council's adopted and emerging policies and is not outweighed by any engaged rights.

Section 106 and Community Infrastructure Levy

- 9.306 Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 9.307 Enfield adopted their local CIL Charging Schedule in April 2016. The site falls within the 'Lower Rate Eastern Zone' for Community Infrastructure Levy Residential Zones. As such, for Class C3 residential uses, CIL is charged at £40 per square metre. For retail, financial and professional services including betting shops, restaurants and cafes, drinking establishments and hot food takeaways CIL is charged at £60 per sqm across the borough. All other uses (including offices, industrial, hotels, leisure facilities, community and other uses) have a CIL liability of £0 per square metre.
- 9.308 In the London Borough of Enfield the Mayoral CIL rate is £60, plus indexation, per sqm of net additional floorspace for all development other than developed used wholly or mainly for health and education.

- 9.309 Credits for demolition and social housing relief can be used to reduce the amount of CIL payable.
- 9.310 Based on current details of 28,635sqm floorspace, certain scheme assumptions, indexation assumptions and inclusion of relief, the MCIL owed is approximately £1,718,100. The amount of Enfield CIL owed is £1,145,400.

Section 106 Heads of Terms

- 9.311 The NPPF requires that planning obligations must be:
- 1) Necessary to make the development acceptable in planning terms;
 - 2) Directly related to the development; and,
 - 3) Fairly and reasonably related in scale and kind to the development.
- 9.312 Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.
- 9.313 Enfield Core Policy 46 seeks to ensure that development proposals make adequate provision for both infrastructure and community facilities that directly relate to the development. Developers will be expected to meet the full costs of facilities required as a consequence of development and to contribute to resolving deficiencies where there would be made worse by the development. The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation.
- 9.314 Additionally, LP Policy S1 refers to social infrastructure and seeks to ensure that the diverse needs of London's communities are met, including health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities.
- 9.315 Having discussed with the Applicant matters requiring mitigation, a legal agreement would be required and will comprise the following Heads of Terms:

Heads of Terms	Description
Viability Review Mechanisms	<ul style="list-style-type: none"> • An updated viability appraisal with actual costs and values replacing estimated values as the scheme progresses • Early-Stage, Middle-Stage and Late-Stage Viability Review Mechanism • Increase to affordable housing minimum in the case of any surplus identified on early and mid-stage reviews, with a financial contribution calculated where there is a surplus on late review.
Affordable Housing	<ul style="list-style-type: none"> • Subject to viability, provision of Affordable Housing in accordance with affordable housing tenure split affordability

	<ul style="list-style-type: none"> • Enfield Nomination rights
Health	<ul style="list-style-type: none"> • £63,700 contribution for the provision of expanded health services within the vicinity of the development at the point of population uplift
Travel	<ul style="list-style-type: none"> • Travel Plans (residential & non-residential) • Travel Plan monitoring • Parking permit restrictions • £90,000 contribution towards Sustainable Transport • Loading bay financial contribution • CPZ consultation contribution at commencement • CPZ implementation contribution at conclusion of
Energy	<ul style="list-style-type: none"> • £142,728.00 Carbon Offsetting contribution. • Feasibility for connection to District Energy Network. Measures to ensure connection to a district energy network to supply low carbon heat. • Monitoring ('Been Seen') GLA Monitoring Portal. • BREEAM 'Excellent'
Education	<ul style="list-style-type: none"> • £45,630 - education per dwelling (£2,535)
Biodiversity	<ul style="list-style-type: none"> • £3,677 contribution for SAMMs • £32,270 contribution for SANGs • Administration fee
Employment	<ul style="list-style-type: none"> • An Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, reporting and associated targets. – propose 1 apprenticeship for every £3million spend on the build • Request 25% local labour and a minimum of 10% local spend on materials. • scope to work with the developer to discuss employer events, school engagement and other interventions further down the line
Miscellaneous	<ul style="list-style-type: none"> • LBE Management fee (maximum 5% of value of financial contributions). • Payment of legal costs • Index linked contributions

10. Conclusion

- 10.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning applications must be determined in accordance the development plan unless material considerations indicate otherwise.
- 10.2 The Council has committed to an ambitious house building programme to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This is captured in the Council's 2020-2030 Housing and Growth Strategy.
- 10.3 For the reasons considered above whilst the Council recognises the merits of the proposal, these have been assessed against the policies of the development plan and other material planning considerations. Officers consider that on balance the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

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Notes

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rev.	date.	dwn.



Opt H1c rev 15 (15 residential storey)



Opt H1c rev 15 (+1 storey)



H1c - rev 15a



H1c-rev15 - rear view



H1c-rev15 (+1 storey) - rear view

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project	Tepe Tower (former Station Tavern), Green Street, Enfield Mr M Tepe, Yen of London	
title	Option H1c	
scale	NTS @ A3	dwn SD
date	Jan 2024	chk
drwg no.	427- 700	rev 15a

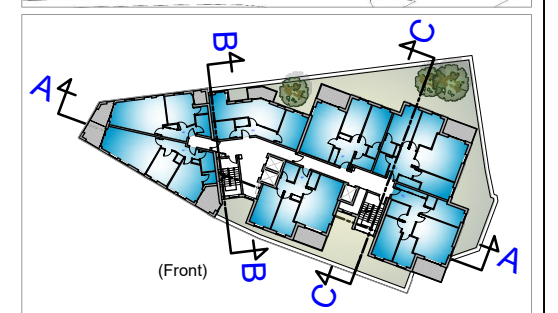
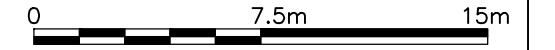
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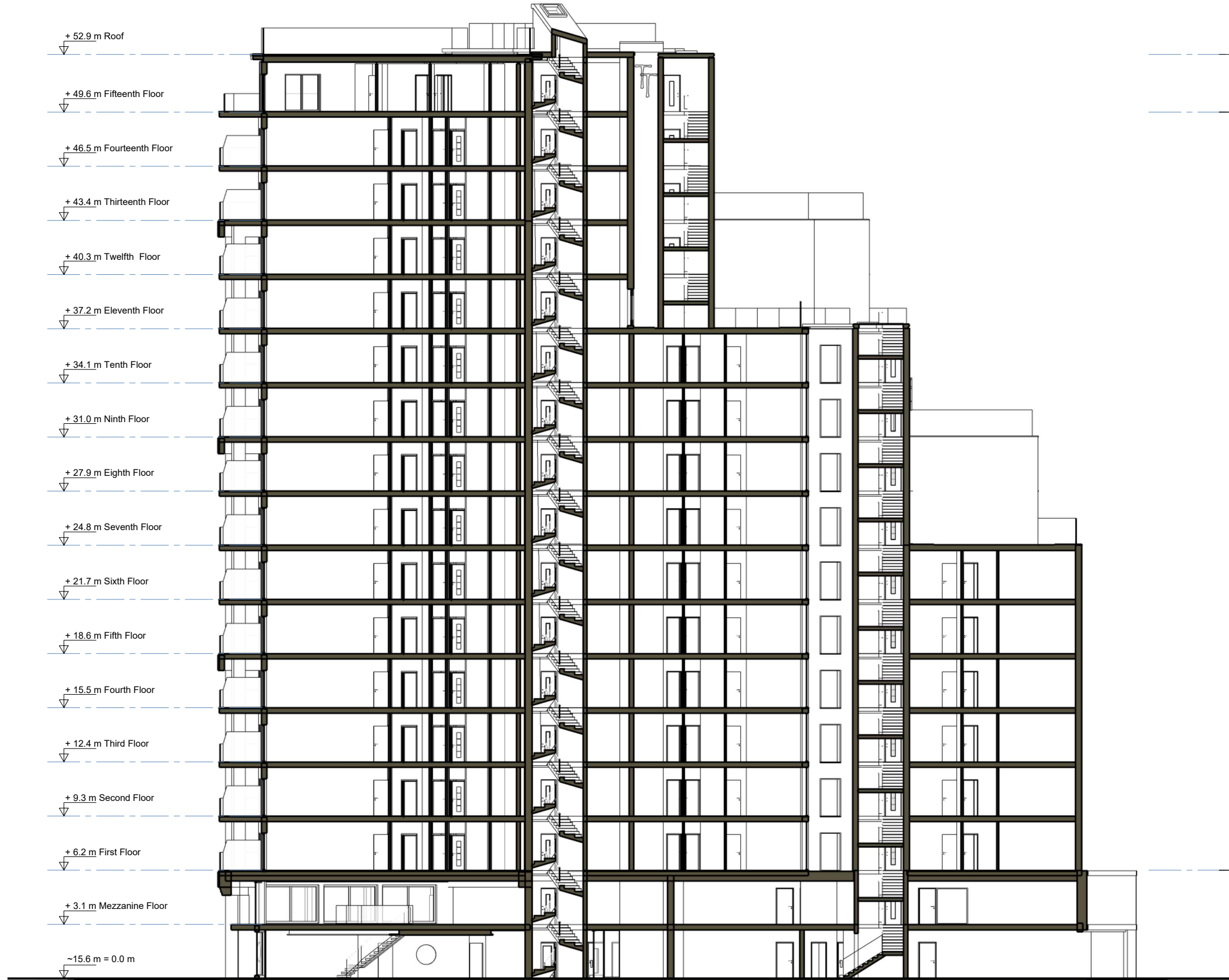


Key Plan - NTS

Penthouse
 Residential
 Commercial

3300
 43400
 53600
 6200

+ 52.9 m Roof
 + 49.6 m Fifteenth Floor
 + 46.5 m Fourteenth Floor
 + 43.4 m Thirteenth Floor
 + 40.3 m Twelfth Floor
 + 37.2 m Eleventh Floor
 + 34.1 m Tenth Floor
 + 31.0 m Ninth Floor
 + 27.9 m Eighth Floor
 + 24.8 m Seventh Floor
 + 21.7 m Sixth Floor
 + 18.6 m Fifth Floor
 + 15.5 m Fourth Floor
 + 12.4 m Third Floor
 + 9.3 m Second Floor
 + 6.2 m First Floor
 + 3.1 m Mezzanine Floor
 -15.6 m = 0.0 m



Section AA

<h2>IntelliArch Ltd</h2> <p>Intelligent Architecture and Surveying 47 Eversley Park Road, London N21 1JJ T: 0208 4435882 M: 07956 296 076 E: info@i-arch.co.uk W: www.i-arch.co.uk</p>	
<p>project Tepe Tower (former Station Tavern), Green Street, Enfield Mr M Tepe, Yen of London</p>	<p>Option H1c</p>
<p>scale 1:250 @ A3</p>	<p>dwn SD</p>
<p>date Jan 2024</p>	<p>chk chik</p>
<p>drg no. 427- 500</p>	<p>rev 15a</p>

FOR PLANNING

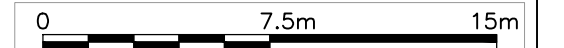
South - South-West Elevation

Notes

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







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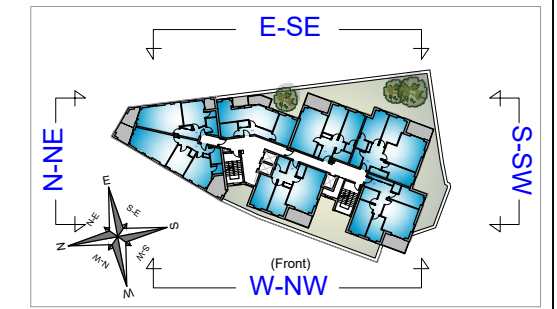
rev.	date.	dwn.



Note:

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

-  Terracotta cladding
-  Brick cladding (brown darker tone)
-  Brick cladding (brown lighter tone)
-  Glass
-  Contrasting colour (TBA)
-  Possible zinc



Key Plan - NTS

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project
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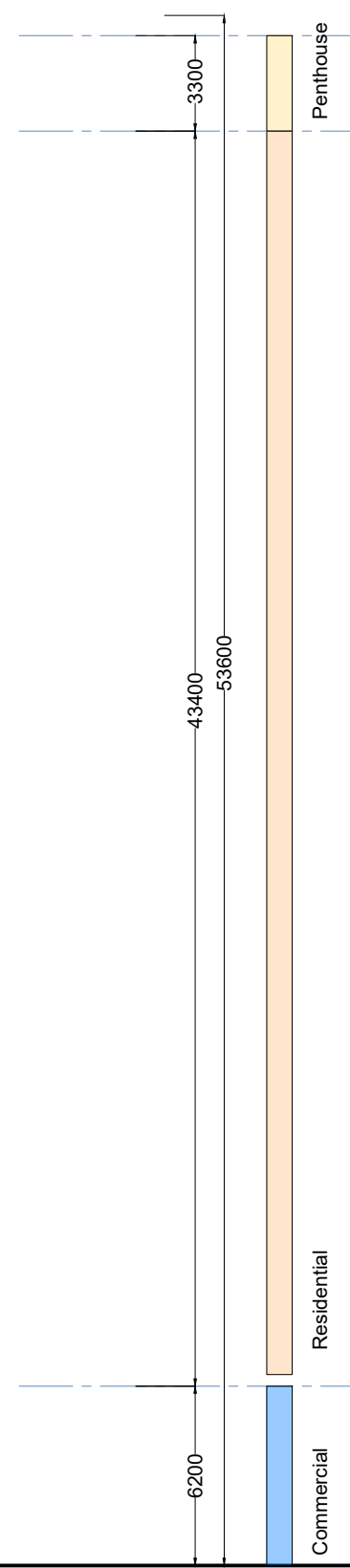
title
 Side elevation Option H1c

scale
 1:250 @ A3 dwn SD

date
 Jan 2024 chk

drg no.
427- 403 rev
 15a

- ↓ + 52.9 m Roof
- ↓ + 49.6 m Fifteenth Floor
- ↓ + 46.5 m Fourteenth Floor
- ↓ + 43.4 m Thirteenth Floor
- ↓ + 40.3 m Twelfth Floor
- ↓ + 37.2 m Eleventh Floor
- ↓ + 34.1 m Tenth Floor
- ↓ + 31.0 m Ninth Floor
- ↓ + 27.9 m Eighth Floor
- ↓ + 24.8 m Seventh Floor
- ↓ + 21.7 m Sixth Floor
- ↓ + 18.6 m Fifth Floor
- ↓ + 15.5 m Fourth Floor
- ↓ + 12.4 m Third Floor
- ↓ + 9.3 m Second Floor
- ↓ + 6.2 m First Floor
- ↓ + 3.1 m Mezzanine Floor
- ↓ -15.6 m = 0.0 m



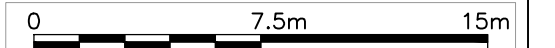
FOR PLANNING
East - South-East Elevation

Notes

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




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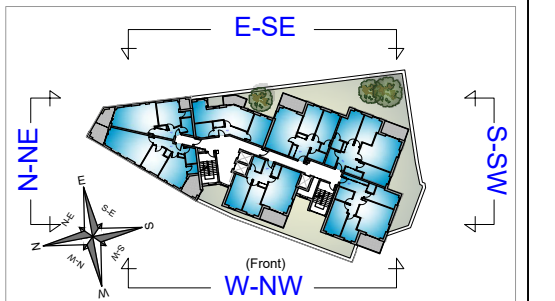
rev.	date.	dwn.



Note:

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

-  Terracotta cladding
-  Brick cladding (brown darker tone)
-  Brick cladding (brown lighter tone)
-  Glass
-  Contrasting colour (TBA)
-  Possible zinc



Key Plan - NTS

IntelliArch Ltd
Intelligent Architecture and Surveying
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project
Tepe Tower (former Station Tavern), Green Street, Enfield
Mr M Tepe, Yen of London

title
Rear elevation Option H1c

scale
1:250 @ A3 dwn SD

date
Jan 2024 chk

drg no.
427- 402 rev
15a



Penthouse

Residential

Commercial

FOR PLANNING

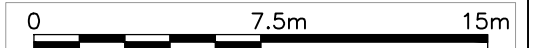
West - North-West Elevation

Notes

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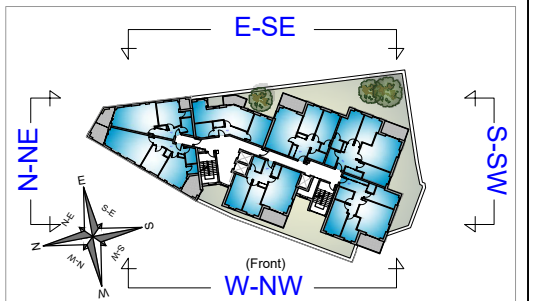
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project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

title
 Front elevation Option H1c

scale
 1:250 @ A3 dwn SD

date
 Jan 2024 chk

drg no.
427- 400

rev
 15a



FOR PLANNING

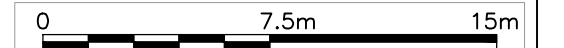
North - North-East Elevation

Notes

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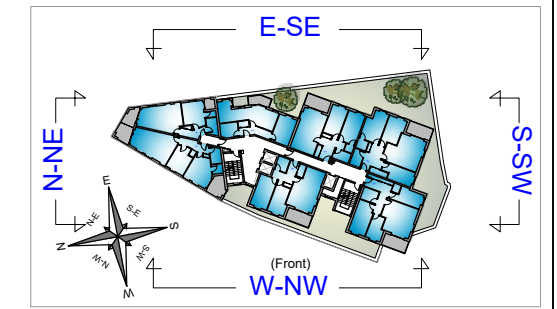
rev.	date.	dwn.
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Note:

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-  Brick cladding (brown darker tone)
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-  Glass
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Key Plan - NTS

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

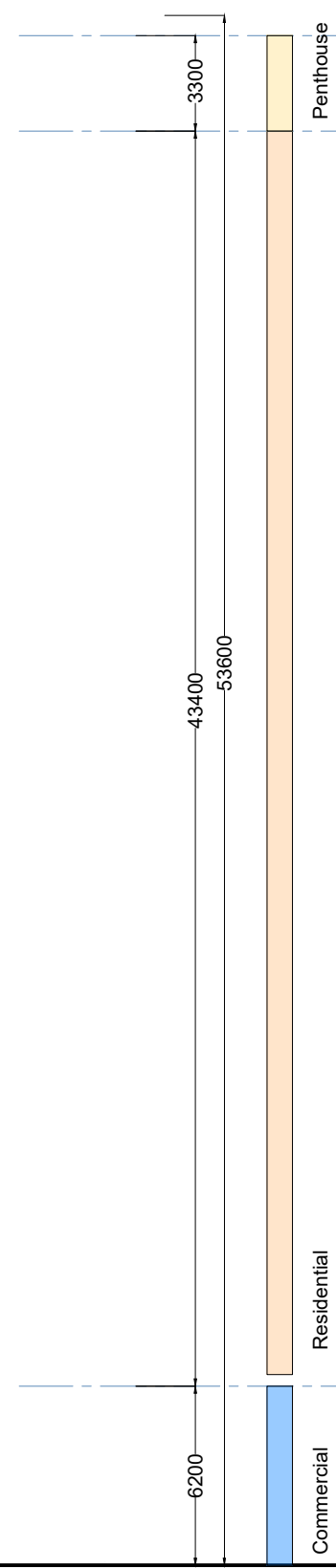
title
 Side elevation Option H1c

scale
 1:250 @ A3 dwn SD

date
 Jan 2024 chk

drg no. 427- 401	rev 15a
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- ↓ + 52.9 m Roof
- ↓ + 49.6 m Fifteenth Floor
- ↓ + 46.5 m Fourteenth Floor
- ↓ + 43.4 m Thirteenth Floor
- ↓ + 40.3 m Twelfth Floor
- ↓ + 37.2 m Eleventh Floor
- ↓ + 34.1 m Tenth Floor
- ↓ + 31.0 m Ninth Floor
- ↓ + 27.9 m Eighth Floor
- ↓ + 24.8 m Seventh Floor
- ↓ + 21.7 m Sixth Floor
- ↓ + 18.6 m Fifth Floor
- ↓ + 15.5 m Fourth Floor
- ↓ + 12.4 m Third Floor
- ↓ + 9.3 m Second Floor
- ↓ + 6.2 m First Floor
- ↓ + 3.1 m Mezzanine Floor
- ↓ -15.6 m = 0.0 m

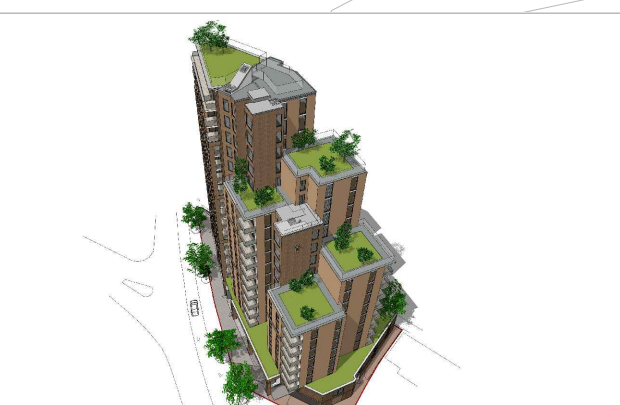
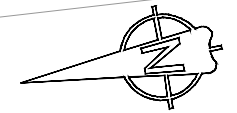
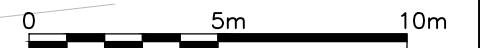


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Conceptual 3d views

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

title
Roof plan Option H1c

scale
1:200 @ A3
date
Jan 2024
dwn
SD
chk
chk

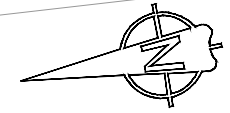
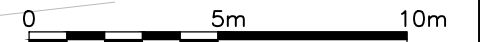
drwg no.
427- 315
rev
15a

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Conceptual 3d views

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

title
 15th floor plan Option H1c

scale
 1:200 @ A3 dwn SD
 date chk
 Jan 2024

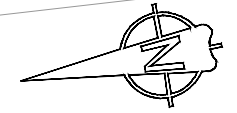
drwg no. rev
427- 313 15a

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

title
 13th floor plan Option H1c

scale
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 date chk
 Jan 2024

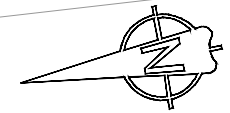
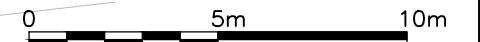
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427- 311 15a

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Typical Floor



Key - NTS



Conceptual 3d views

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

title
 2nd, 3rd, 4th, 5th and 6th floor plan **Option H1c**

scale
 1:200 @ A3
 date
 Jan 2024

dwn
 SD
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drg no.
427- 303

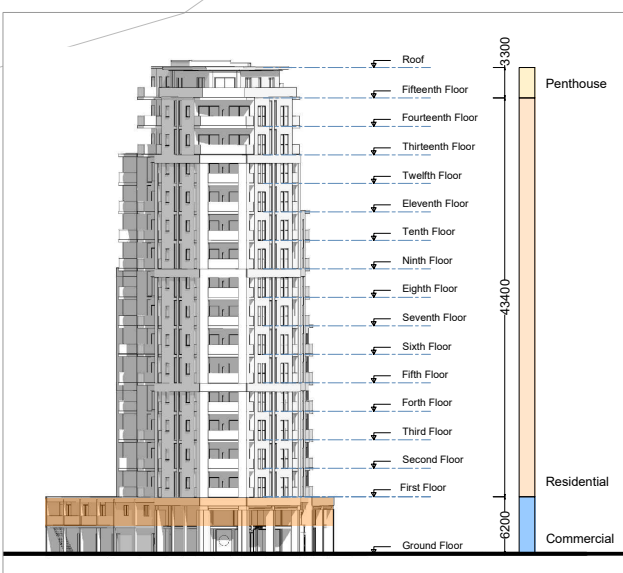
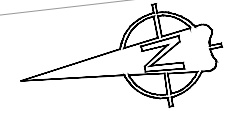
rev
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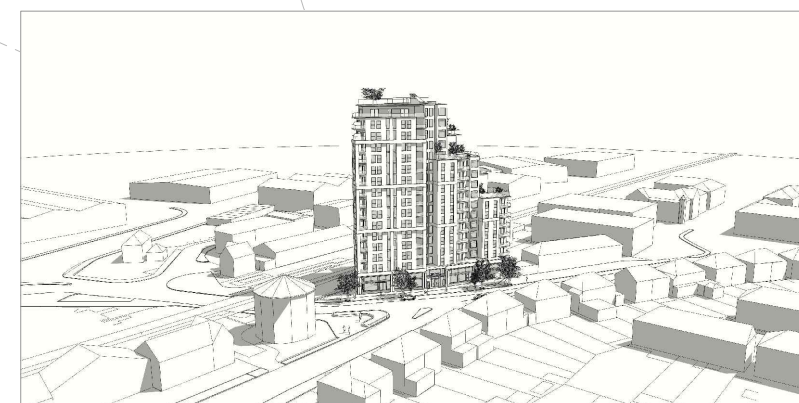
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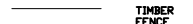












project
 Tepe Tower (former Station Tavern), Green Street, Enfield
 Mr M Tepe, Yen of London

title
 Mezzanine floor plan Option H1c

scale 1:200 @ A3	dwn SD
date Jan 2024	chk chk

drwg no. 427- 301	rev 15a (Opt C)
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FOR PLANNING

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

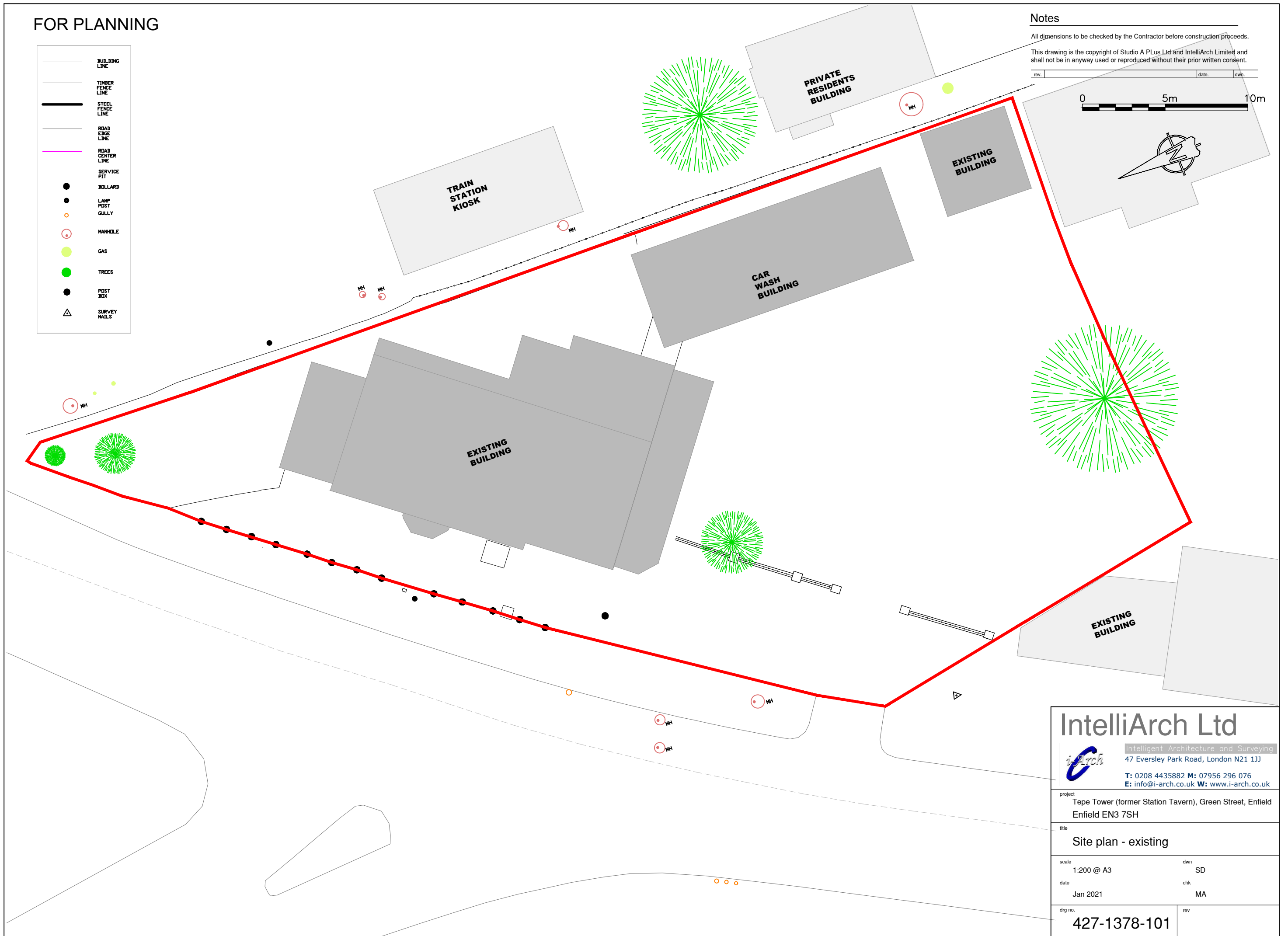
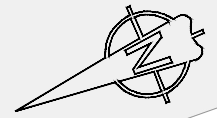
Notes

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rev.	date.	dwn.
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0 5m 10m



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

title
Site plan - existing

scale
1:200 @ A3

dwn
SD

date
Jan 2021

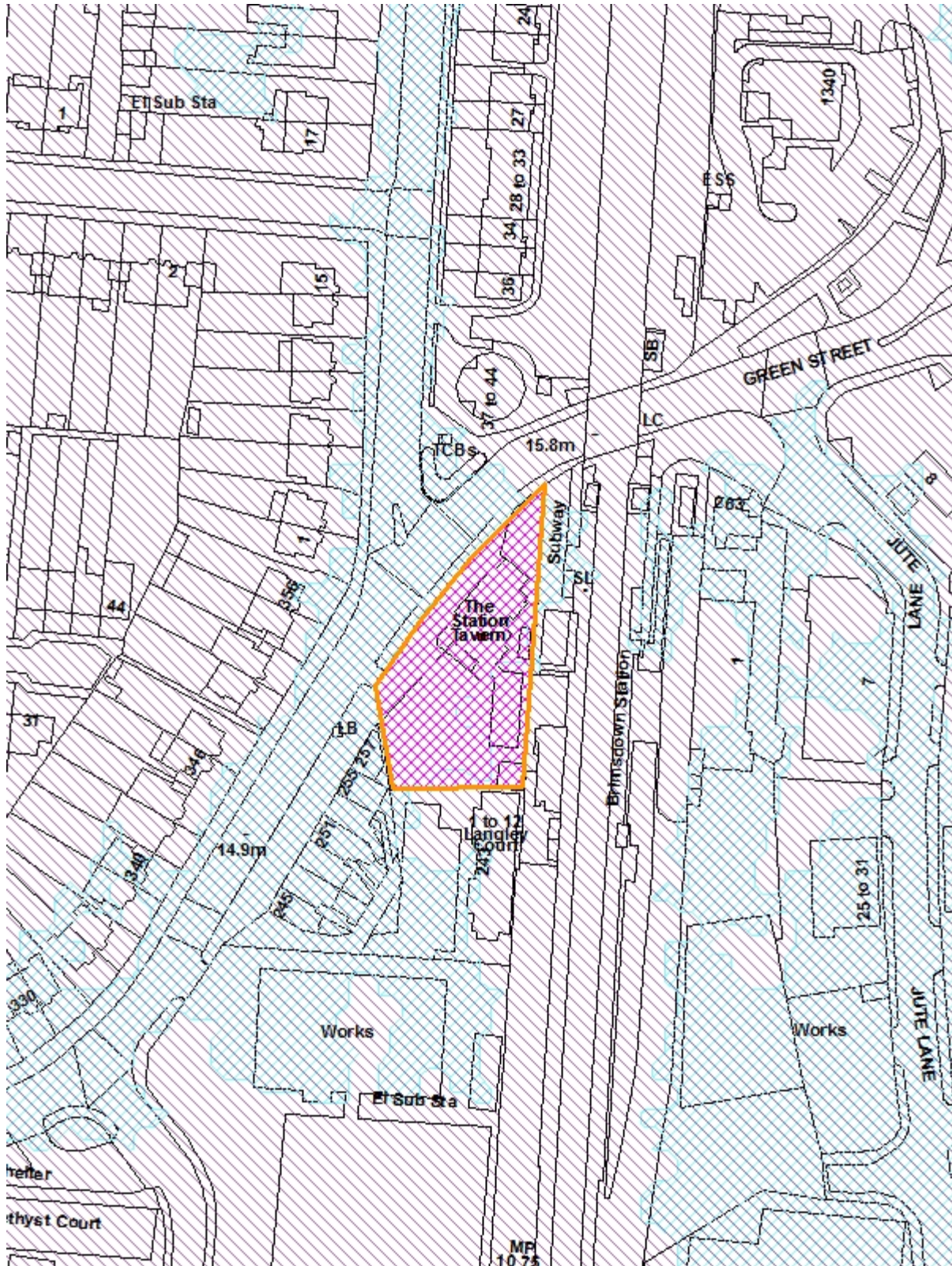
chk
MA

drwg no. 427-1378-101	rev
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PLANNING COMMITTEE		Date: 19 July 2022
Report of Head of Planning Vincent Lacovara	Contact Officer: Andy Higham David Gittens	Ward: Brimmsdown
Ref: 21/01140/FUL		Category: Full Planning Application
LOCATION: Public House, Green Street, Enfield EN3 7SH		
PROPOSAL: Redevelopment of site to provide mixed use residential development involving erection of a 21 storey building with double basement comprising 100 self-contained (private and social residential units), in addition to commercial and retail areas on ground and mezzanine.		
Applicant Name & Address: Mr Tepe	Agent Name & Address: Mr Murat Aydemir Intelliarch Ltd 47 Eversley Park Road London N21 1JJ murat@i-arch.co.uk	
RECOMMENDATION:		
<ol style="list-style-type: none"> 1. That planning permission be REFUSED 2. That the Head of Development Management be granted delegated authority to agree the final wording of the reasons for refusal as indicated in the Recommendation section of the report. 		

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



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Scale 1:1250

North



1. Note for Members

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

2. Recommendation:

- 2.1. The Head of Development Management / the Planning Decisions Manager be authorised to **REFUSE** planning permission for the following reasons:

- 1 No case has been demonstrated to justify the loss of the existing public house, that there is no demand for the existing public house use on the site, that there is no demand for any alternative community use in the premises, nor that a suitable replacement would be provided within the scheme. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policy HC7 of the London Plan (2021) and policy CL6 and SC2 of the Draft Enfield Local plan (2021)
- 2 The proposal seeks to provide office use in a location that is not a preferred office location without applying the sequential test. As such, and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, this would not be outweighed by the public benefits of delivering new residential accommodation, including affordable residential accommodation, it would be contrary to Policy DMD25 of the Enfield Development Management Document (2014).
- 3 The proposed development by reason of its high density, together with its unsympathetic architectural approach, bulk, scale, mass and design, would result in the introduction of an overly intensive building that would constitute the gross overdevelopment of the site. The building would bear no relation to the scale, character and appearance of the locality and would fail to integrate satisfactorily with its surroundings. As such, and having regard to housing

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

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

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

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

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

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

- 9 In the absence of a legal agreement to secure policy compliant financial and nonfinancial contributions including for affordable housing, health care, employment, skills, training and enterprise, transport matters, public realm

improvements and carbon offsetting contribution, the development fails to mitigate its impact on local services, amenities, infrastructure and environment. This is contrary to the requirement of policy DF1 of the London Plan, Policy CP46 of the Enfield Core Strategy (2010) and the Enfield Section 106 Supplementary Planning Document (2016)

- 9 In the absence of a Fires Strategy the application is contrary to Policy D12 of the London Plan (2021)
- 10 In the absence of an inclusive design statement that demonstrates how the proposals will deliver an inclusive environment, the application is contrary Policy D3 of London Plan (2021), Policy DMD37 and DMD39 of the Enfield Development Management Document (2014) and the Accessible London SPG.
- 11 The proposal is deficient in the provision of on-site children's play space required for the likely child yield of the development contrary to s not compliant with Policy S4 of the London Plan (2021)

3. Executive Summary

- 3.1 This report provides an assessment of the planning application for the redevelopment of this public house site to provide a mixed use residential-led development involving erection of a 21 storey building with double basement, and comprising 100 self-contained flats incorporating some underground parking.
- 3.2 The site is considered brownfield and a sustainable location and, notwithstanding the in-principle issue relating to the loss of a public house on the site, has the potential to accommodate an appropriately scaled mixed use development that could significantly intensify the usage of this site adjacent to one of the boroughs transport nodes.
- 3.3 The application was received following a preapplication process in 2019/2021 that presented a 24 storey tall building that contained 148 flats which was considered to be far too intensive a proposal for this restricted site. The pre-application scheme presented a very high residential density of 3277 habitable rooms per hectare, more than 7 times greater than the end of the range of 450 habitable rooms per hectare anticipated by the previous London Plan in a PTAL2/3 urban location.
- 3.4 The application currently before Members, at 2,391 habitable rooms per hectare and 21 storeys, is also considered to be unacceptably dense, exhibiting tell tale symptoms

of overdevelopment such as excessive height, insufficient amenity space, poor design, inadequate parking and poor servicing arrangements as described in the report.

- 3.5 Whilst offering 40% affordable housing, and seeking to be considered under the GLA's fast track procedure, the applicant has not provided detailed information regarding the tenure of the affordable housing and is therefore not able to be considered under the London Plan's fast track process. However the applicant has not provided a viability assessment which is required to follow the London Plan's alternate viability tested route.
- 3.6 The transport officer has assessed the scheme and, taking into account that the site is not located within a controlled parking zone, and the high proportion of family units proposed, considers the parking provision not to be satisfactory for the number of units and mix of uses and the parking and circulation areas inadequately designed with some parking inaccessible. They also considered that there was potential for vehicle conflicts in the servicing areas with the access points potentially causing issues with vehicles queueing in Green Street and concern was expressed at the proposed reliance on a car lift for access to the parking in the event that the lift could break down at any point.
- 3.7 The many shortcomings of this application are considered to outweigh the public benefits of delivering new residential accommodation and despite having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, the application is not considered acceptable and accordingly is recommended for refusal.

4. Site and Surroundings:

- 4.1 The site in question forms an irregularly kite-shaped site that measures approximately 1355 square metres, located on the eastern side of Green Street, with its apex adjacent to the level crossing at Brimsdown Railway Station which offers access to rail services on the West Anglia main line. The site is bounded to the east by Brimsdown Station, beyond which lies a large swathe of land designated as Strategic Industrial Land.
- 4.2 To the west of the site, across Green Street lies a row of 2 storey semi detached houses which continue into the west side of Brimsdown Avenue that starts directly

opposite the site. Beyond this to the north and west lies large areas of similarly scaled 2 storey houses.

- 4.3 To the north of the site, at the junction of Green Street and Brimsdown Avenue lies a distinctive 4 storey block of flats with a dodecagon shaped footprint.
- 4.4 To the south east, the site is bound by small 3 storey residential block (that also backs onto the railway) and to the immediate south west lies a 2-storey block comprising of commercial floorspace with residential accommodation above that fronts Green Street. This is the heart of the designated Brimsdown Local Shopping Parade of which the application site forms its northernmost extent. Beyond this to the south and south west the area is generally characterised by 3-4 storey flatted developments of late 20th Century construction with off street parking set to the sides and/or rear.
- .5 The site contains a vacant 2 storey former public house that was last operated as The Station Tavern. The site also has a car park to the rear/south of the main building. There are 2 single storey structures located on the eastern boundary.
- 4.6 All of the housing in the locality, and indeed the subject site also, is characterised by the existing buildings having generous setbacks from the back edge of pavement.
- 4.7 The majority of the site lies within Flood Zone 2 and together with the shops to its south forms the Brimsdown Local Centre. There are no conservation areas nor any statutorily or locally listed buildings on or near the site.

5. Proposal:

- 5.1 Application is made to redevelop site involving demolition of all existing buildings to facilitate the erection of a mixed-use building providing a total of 100 flats (32 x 1 bed 2 person, 12 x 2 bed 4 person , 56 x 3 bed 5/6 person), together with 8 offices, 3 retail units and 2 restaurants all located within a single tower of 21 storeys.
- 5.2 The proposal seeks to accommodate:
- Vehicular and cycle parking:
Basement 1 – 19 vehicular parking and 150 cycle storage spaces.
Basement 2 – 19 vehicular parking and 150 cycle storage spaces.
Ground floor – 4 exterior vehicular parking.
 - Servicing/refuse at ground floor level.
 - Retail at ground/mezzanine level (up to 3 units/973 sq metres);

- Residential:
Floors 1st to 14th – 88 flats/6,979.6 sq metres)
Floors 17th to 18th - penthouses - 12 flats/913.6 sq metres)
 - Office use:
Floor 15th - 8 offices/start-ups (362.2 sq metres)
 - Restaurants use:
Floor 16th – 2 restaurants (598 sq metres)
 - External communal amenity:
First floor 175+40 m² green roof.
Fifth floor 56 m².
Tenth floor 56 m².
Roof floor 535 m².
- 5.3 The proposed 88 flats on floors 1 to 14 would be equally divided into 56 x 3 bedroom flats and 32 x 1 bedroom flats. The 12 penthouse flats on floors 17th and 18th would be 12 x 2 bedroom flats.
- 5.4 In residential terms, the tower would be internally divided equally into Block A and Block B with each block having independent vertical circulation and separate lobbies.
- 6.0 Relevant History:**
- Planning History
- 6.1 Whilst there have been a few planning related applications for minor external alterations to the building over the past 60 years, there are none that are relevant to the context of this application to redevelop the site. The pub appears to have been vacant for many years.
- Pre-application
- 6.2 19/03610/PREAPP – Preapplication proposal for the redevelopment of site to provide a 24 storey mixed-use tower with 148 flats, 12, offices, 4 retail units, 2 restaurants and a gym.
- 6.3 Councils pre-application comments (conclusion)

- *The Council would be supportive of a housing led mixed use redevelopment of the site. The proposals in development suggest significant regenerative benefits that would spring from the optimisation of the usage of this important urban site including the renewal of the urban fabric, delivery of much needed affordable housing and new street facing commercial activity.*
- *The Council needs to balance these potential benefits against the unfeasibly high residential densities proposed and the proposed scale, bulk and mass which, at 24 storeys is wholly at odds with the scale of the existing surroundings.*
- *Whilst the redevelopment of this site has the potential to be a catalyst for development nearby, the proposed scale has significant difficulties in its relationship with the smaller residential and mixed use buildings in the immediate vicinity. Accordingly, the scale of the proposals may need to be reconsidered in the context of their present surroundings.*
- *There remain significant highways related matters that would need to be resolved before any application is made.*

7.0 Consultation: 23 object, 18 support, 1 neutral

Public Response

- 7.1 The Council notified some 768 local addresses in respect of the planning application by letter dated 3 June 2021 and a site notice displayed near the site on Green Street on 7 June 2021. The development was also advertised in the Enfield Independent on the 9 June 2021.
- 7.2 At the time of writing the report the application had received 24 objections. The application also received 18 letters of support. One letter was recorded as neutral. The objectors concerns are summarised below:
- Close to adjoining properties
 - Conflict with local plan
 - Development too high
 - Inadequate parking provision

- Increase in traffic
- Increase of pollution
- Loss of light
- Loss of parking
- Loss of privacy
- More open space needed on development
- Noise nuisance
- Not enough info given on application
- Out of keeping with character of area
- Over development
- Inadequate consultation.
- Construction issues/impact from construction.
- Insufficient play-space.
- Inadequate dwelling mix.
- Health & Safety associated to high rise buildings.
- Depression associated to high rise.
- Change of use application.
- Not environmentally friendly.
- High rise promotes Covid transmission.
- No demand for two-bedroom units.
- Affects local ecology.
- Impact on local facilities.

7.3 Comments from the letters of support are summarised below:

- This is a great development project for this area we need to rejuvenate Brimsdown just like the surrounding areas that are currently being developed and improved
- Currently its a run down pub would love to see a new building with new local businesses
- I think new office space will be excellent bring in new jobs and hopefully established businesses into Brimsdown and Enfield
- Currently the site is a run down pub which isn't good for the environment / people. Having a brand new building that provides employment as well as residential opportunities will be much more beneficial for the local area. As this will create new jobs for people which will essentially help the current low employment rate especially with the current pandemic and also low income families to have a home.

- The property location is also great, it's right next to Brimsdown station which has quick access links to key area such as central London, Stratford, Stanstead airport and also other rural areas such as Cambridgeshire, Bishops Stortford & Hertford East.
- I always use the train station in Brimsdown I would love to see new shops opening in that premises as currently its very restricted of what i can purchase from the local shops

Officer response to comments

- 7.4 *The material planning concerns within the letters of response have been taken into account by officers during the consideration of the planning application. Officers also visited the site several times to make assessment of the highlighted concerns. Matters relating to the many impacts of the excessive scale, height and mass of the proposal have been of grave concern for officers.*
- 7.5 *Transport concerns have been raised by many objectors during the consultation period. The transport section of the report provides the position with regard to on-site parking and wider transport implications against adopted policy.*
- 7.6 *It is acknowledged that the site has the potential to accommodate a significant redevelopment that could provide much needed housing, including affordable housing. Regrettably, despite this potential, the proposed affordable housing has not been tenure specified nor viability tested as required under the London Plan policy.*
- 7.7 *The many shortcomings of this application are considered to outweigh the public benefits of delivering new residential accommodation and despite having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, the application is not considered acceptable and accordingly is recommended for refusal*

Statutory and Non-Statutory Consultees:

- 7.8 Internal Consultations:
- 7.8.1 Traffic & Transportation – Serious concerns regarding several aspects of the proposal. Comments are incorporated in the main body of the report, but in brief summary:

- -Parking provision insufficient for the unit and use class mix.
- -Parking layout only suitable for one-way vehicle movement, and concern over use of the car lift.
- -Short stay parking not accessible.
- -Servicing area could be compromised with vehicle conflicts and potentially high numbers of delivery vehicles.
- -Access points may cause issues with vehicles queuing on Green Street

7.8.2 Sustainable Drainage – Objects to the development as the Flood Risk Assessment does not demonstrate that the development is safe from flooding and will not increase flood risk elsewhere and the proposed SuDS strategy does not meet the requirements of policy DMD61. Further comments are incorporated in the main body of the report.

7.8.3 Planning Policy – Object to the proposal, due to the loss of the C4 use, excessive height of a tall building in this location, inappropriate location of office use and inadequate affordable housing/dwelling mix. Comments are incorporated in the main body of the report.

7.8.4 Environmental Health – No objection subject to planning conditions.

7.8.8 Refuse/Waste – no objection subject to conditions.

7.8.9 Energy – Our operational Decentralised Energy Network (DEN) in the area is only 1.7 km away and with other developments arising in the area, we would be keen to extend to this area.

Their proposal seems to use air source heat pumps with a communal heating system to the residential elements. For the offices they seem to be using electric point of use hot water units and reverse cycle air conditioning units for cooling and heating. It is not clear whether they are using gas boilers or air source heat pumps for the roof mounted Air Handling Units (AHUs) supplying fresh air to the offices. Please request clarification.

They would reduce carbon emissions and ongoing energy costs to customers if they:

1. Connected the development to the DEN instead of using heat pumps
2. Connected the commercial part of the development hot water to the DEN instead of electric point of use hot water units
3. Connect the fresh air AHUs to the DEN instead of either heat pumps or gas boilers.

Even if they cannot be persuaded to connect to the DEN the communal heating system should be designed to the Council's SPD for Technical Specification for Distributed Energy Networks so that it is both efficient and compatible with a DEN connection in the future.

7.9 External Consultees

- 7.9.1 No objection subject to more information regarding drainage proposals and conditions to protect groundwater and water infrastructure
- 7.9.2 Met Police – If the Council is minded to approve, Secured by Design condition should be applied, we request the completion of the relevant Secured by Design application forms at the earliest opportunity.
- 7.9.3 Network Rail – the development is likely to have an impact on the adjoining busy level crossing and therefore recommend that:
 - 1 construction traffic does not use the crossing; and,
 - 2 implore that the developer contacts Network Rail to discuss measures to mitigate risk to the level crossing as a result of the development.
- 7.9.4 NHS – Request a primary healthcare s106 financial contribution of £63,700.
- 7.9.5 Environment Agency - We have no objection to the development but remind the Local Planning Authority of the need for a Flood Risk Sequential Test, Flood Risk Standing Advice, and obligations to prevent contamination of groundwater.
- 7.9.6 GLA – The scheme is of a height that is required to be referred to the GLA. The following is a summary of the advice provided by the GLA in respect of the proposal:

London Plan (2021) policies on protecting public houses, opportunity areas, housing, design and residential quality, fire safety, play space, inclusive design, sustainable development, and transport are relevant to this application. Whilst the principle of residential led mixed-use development is supported, a number of strategic concerns are raised, and consequently the application does not accord with London Plan policy. The following could address these deficiencies:

Land use principles: *The site is currently occupied by a public house and further justification is required in relation to the loss of this land use in compliance with London Plan (2021) Policy HC7, before principle of a residential led mixed-use*

development of the site can be confirmed as acceptable. Should an acceptable case be presented for the loss of the public house, the land use proposals for the site can be supported by London Plan (2021) and Enfield Council planning policies.

Affordable housing: *The applicant is currently proposing 40% affordable housing which could be eligible for the Fast Track Route as it exceeds the 35% threshold for this site. However, no details have been provided regarding the tenure of affordable housing and as such the application cannot follow the Fast Track Route until this is confirmed to be in compliance with the London Plan. If this information is not provided the application will be required to follow the viability tested route.*

Design and residential quality: *Significant concerns are raised regarding the height, massing, layout, architectural design and appearance of the building. Whilst emerging development plan policy suggests that a taller building could be appropriate on this site, a building of such significant height appears at odds with local character and requires detailed townscape justification. The overall approach to the building height, massing, layout and elevation treatments is not supported, and require further review and improvement.*

Fire Safety: *A fire statement prepared by suitably qualified personnel has not been submitted with the application, contrary to Policy D12 of the London Plan. This is unacceptable and should be provided before stage 2 submission. Fire evacuation lifts must be provided in accordance with Policy D5. The final approved fire safety strategy should be secured by condition.*

Children's play space: *The applicant has not calculated the child yield and play space requirement for the development or set out a play strategy. This aspect of the application is not compliant with Policy S4 of the London Plan and this required information should be provided before stage 2.*

Inclusive design: *The applicant has not provided an inclusive design statement which demonstrates how the proposals will deliver an inclusive environment that can be safely and easily navigated with dignity by in accordance with Policy D3 of London Plan (2021) and the Accessible London SPG. This aspect of the application is therefore not compliant with the London Plan and the required information should be provided before stage 2.*

Sustainable development: *Further work is required on the energy strategy, green infrastructure, flood risk and surface water mitigation to confirm compliance with London Plan policy. The applicant should provide a whole life carbon assessment*

and Circular Economy statement in accordance with Policy SI 7 of the London Plan (2021).

Transport: Further work is required in relation to healthy streets, cycle and car parking, access and servicing arrangements and agent of change. The construction logistics, delivery and servicing and travel plans should be secured by condition.

7.10 Design Review

7.10.1 The application was presented to and considered by the Enfield Design Review Panel. A full copy of their comments are appended to this report, however they provided the following summary:

The panel expressed serious concerns with a number of aspects of the proposal. In summary:

- *The quantum of accommodation being proposed is too high.*
- *The height of the building is excessive and the bulk is too great for the context, also leading to concerns over microclimate (in particular wind and overshadowing of neighbours and the public realm).*
- *It is doubtful that the proposed uses and their arrangement within the building will be appealing to the market in this location (in particular the high-level restaurant).*
- *There is a poor relationship between the ground floor and public realm (in terms of active frontage, building access locations etc). An accessible ground floor community offer should be considered instead of commercial space at upper floors.*
- *The shared residential and commercial circulation is not supported and will be difficult to manage, as well as introducing issues for resident's quality of life.*
- *The arrangement and location of cycle parking in the basement is inconvenient and likely to discourage use. Provision at ground floor is acceptable and the applicant is encouraged to consider vertical distribution throughout the building.*
- *Single aspect units should be avoided wherever possible. While efforts have been made to introduce dual aspect units, the nature of the solution is unlikely to result in cross-ventilation, which is a primary aim of dual aspect.*
- *The proposed materials are inappropriate, being too many and without a clear justification based on contextual references.*
- *The landscape elements of the proposal should be reviewed to address concerns regarding the accessibility, functionality and distribution of the spaces, ensuring that biodiversity and microclimate are fully considered.*

- *The applicant is advised to revisit the design strategy, starting from the context, identifying opportunities and constraints and delivering a proposal which clearly responds to these.*

8.0 Relevant Policies:

NPPF (Adopted February 2021)

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

- 8.5 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.6 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 Enfield 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. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the “presumption in favour of sustainable development” category.
- 8.7 This is referred to as the “tilted balance” and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole - – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’.
- 8.8 However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 200 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 8.9 Key relevant policy objectives in NPPF (2021) to the site are referred to below,
- Section 5 – Delivering a sufficient supply of homes Para 60 - 77.
 - Section 8 – Promoting Healthy and safe communities, Para 92 & 97
 - Section 9 – Promoting sustainable transport, Para 104-113
 - Section 11 – Making effective use of land Para 119 -125
 - Section 12 – Achieving well-designed places, Para 126-136

London Plan (2021)

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

- GG1: Building Strong and Inclusive Communities
- GG2: Making the best use of land
- GG4: Delivering the Homes Londoners Need
- D3: Optimising site capacity through the design-led approach
- D4: Delivering good design
- D5: Inclusive design
- D6: Housing Quality and Standards
- D7: Accessible Housing
- D9: Tall buildings
- D11: Safety, Security and Resilience to Emergency
- D12: Fire Safety
- D14: Noise
- H1: Increasing Housing Supply:
- H4: Delivering Affordable Housing
- H5: Threshold Approach to Applications
- H6: Affordable Housing Tenure
- H10: Housing Size Mix
- H12: Supported and specialised accommodation
- H13: Specialist older persons housing
- S2: Health and social care facilities
- S4: Play and Informal Recreation
- G5: Urban Greening
- G6: Biodiversity and Access to Nature
- G7: Trees and Woodland
- SI3: Energy infrastructure
- SI4: Managing heat risk
- SI13: Sustainable drainage
- SI5: Water Infrastructure
- SI7: Reducing Waste and Supporting the Circular Economy
- T1: Strategic approach to transport
- T2: Healthy Streets

- T3: Transport capacity, connectivity and safeguarding
- T4: Assessing and mitigating transport impacts
- T5: Cycling
- T6: Car Parking
- T6.1: Residential Parking
- T7: Deliveries, Servicing and Construction
- T9: Funding transport infrastructure through planning

Local Plan – Overview

8.11 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.

8.12 Core Strategy (2010)

- CP2: Housing supply and locations for new homes
- CP3: Affordable housing
- CP4: Housing quality
- CP5: Housing types
- CP6: Meeting Particular housing needs
- CP20: Sustainable energy use and energy infrastructure
- CP21: Delivering sustainable water supply, drainage and sewerage infrastructure
- CP22: Delivering sustainable waste management
- CP25: Pedestrians and cyclists
- CP30: Maintaining and improving the quality of the built and open environment
- CP32: Pollution
- CP36: Biodiversity
- CP46: Infrastructure contributions

8.13 Development Management Document (2014)

- 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
- DMD15: Specialist Housing Needs
- 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
- DMD54: Allowable Solutions
- DMD55: Use of Roof Space / Vertical Surfaces
- DMD56: Heating and Cooling
- DMD57: Responsible Sourcing of Materials
- DMD58: Water Efficiency
- DMD61: Managing Surface Water
- DMD65: Air Quality
- DMD66: Land contamination and instability
- DMD68: Noise
- DMD69: Light Pollution
- DMD72: Open Space Provision
- DMD73: Children's Play Space
- DMD78: Nature Conservation
- DMD79: Ecological Enhancements
- DMD80: Trees on Development sites
- DMD81: Landscaping
- DMD83: Development Adjacent to the Green Belt
- DMD Appendix 9 - Road classifications

8.14 Other material Policy documents
National Planning Practice Guidance
Mayor of London Housing SPG (Adopted March 2016)

Enfield Strategic Housing Market Assessment Update (2015)
 Community Infrastructure Levy Regulations 2010
 LBE S106 SPD (Adopted 2016)
 North East Area Action Plan
 Enfield Climate Action Plan (2020)
 Enfield Housing and Growth Strategy (2020)
 Enfield Intermediate Housing Policy (2020)
 Enfield Biodiversity Action Plan
 Enfield Characterisation Study (2011)
 Enfield Local Heritage List (May 2018)
 Enfield S106 SPD (2016)
 Enfield Decentralised Energy Network Technical Specification SPD (2015)
 Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
 London Councils: Air Quality and Planning Guidance (2007)
 TfL London Cycle Design Standards (2014)
 GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
 GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
 GLA: London Sustainable Design and Construction SPG (2014)
 GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
 GLA: Social Infrastructure SPG (2015)
 GLA: Housing SPG (2016)
 GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
 Mayor's Transport Strategy (2018)
 Healthy Streets for London (2017)
 Manual for Streets 1 & 2, Inclusive Mobility (2005)
 National Design Guide (2019)

Draft Enfield Local Plan (Reg 18) 2021

- 8.15 Enfield Local Plan - Reg 18 Preferred Approach was approved for consultation on E9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. It is Enfield's emerging Local Plan.
- 8.16 Except where its policies are superseded by the London Plan (2021) or are in conflict with the NPPF (2021), the Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted. As such applications should still continue to be determined in accordance with the Local Plan. Little weight shall be afforded to the Draft Enfield Local Plan (Reg 18), as per NPPF paragraph 48, however where applicable draft policies shall be addressed.

9.0 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 National Planning Policy Framework (NPPF) states that development proposals that accord with an up to date development plan should be approved without delay.....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.
- 9.2 This report sets out the analysis of the issues that arise from the proposed development assessed against National, Regional and adopted strategic and Local planning policies.
- 9.3 The Main considerations of the development are the following:-
- Land use - Principle of proposed uses
 - Development design and character
 - Housing need and tenure mix
 - Standard of accommodation
 - Impact on neighbouring amenity
 - Highway and transport implications
 - Sustainable drainage and water infrastructure
 - Landscaping & Biodiversity impacts
 - Sustainability and Climate Change
 - S106 contributions
 - Community infrastructure Levy
 - Other Matters

Principle of development:

Loss of a public house

- 9.4 London Plan (2021) Policy HC7 “Protecting public houses” aims to protect pubs that have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy

areas, Cultural Quarters and Creative Enterprise Zones. The following text provides a guide for assessing the value of the pub.

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

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

- 9.5 Para 7.7.7 of the London Plan (2021) also suggests 24 months marketing evidence needs to be provided in order to rule out demand for its existing use or any alternative community use.
- 9.6 Policy DMD17 in the adopted Enfield Development Management Document states that the Council will protect existing community facilities in the borough unless a suitable replacement is provided or there is no demand for the existing use or any alternative community use.
- 9.7 Whilst limited weight is given to the emerging Draft Enfield Local Plan, the Draft Plan approach seeks to resist the loss of public houses. Policy CL6 and SC2 of the Draft Enfield are relevant to the loss of a public house where policy SC2 seeks to protect community facilities (including pubs) by resisting their loss unless the criteria set out in part 1 of the policy have been met. Policy CL6 focuses specifically on public houses and resists their loss unless robust evidence is provided as set out in part 1 of the policy.
- 9.8 Policy CL1 (Promoting culture and creativity) of the Draft Plan takes a similar approach and aims to protect pubs unless they are:
 - 1 surplus to requirements and unviable;
 - 2 alternative provision has been made in the vicinity; and,
 - 3 appropriate marketing for continuous period of at least 18 months has taken place.

- 9.9 In this case the applicant has not submitted any information to justify the loss of the existing public house use, no suitable replacement is proposed and it has not been demonstrated that there is no demand for the existing use or any alternative community use of the premises in the area. In this instance and in the absence of this information, the loss of the existing community use is considered unacceptable and contrary to the above-mentioned policies and presents an in principle objection to the redevelopment of the site. The redevelopment of the site to provide residential accommodation can only be considered by setting aside the in principle objection to the loss of the public house.

Office (B1 use) Development

- 9.10 With respect to office development in this location Policy DMD25 of the adopted Development Management Policies (2014) permits major development being permitted in Enfield Town and the district centres, otherwise the sequential test is applied. This policy position is followed through in Draft Strategic Policy TC2 which also requires application of the sequential test or new offices outside of the preferred areas. As the applicant as not applied the sequential test, the provision of office floorspace within the development has not been justified and would attract a recommendation for refusal on this basis.

Residential use

- 9.11 As brownfield land, the principle of new residential-led redevelopment of the site would contribute towards meeting the strategic housing needs of Greater London and increase the housing stock of Enfield in accordance with the National Planning Policy Framework (NPPF), policy H1 of the London Plan (2021) and Policy CP5 of the Enfield Core Strategy (2010).
- 9.12 In addition, the provision of a mix of commercial uses on a presently unoccupied site to a greater intensity than the employment generating floorspace presently available at the site would also be generally considered acceptable and very positive for the locality.
- 9.13 Para 120 of Chapter 11 of NPPF (2021) Making efficient use of land expects councils to:
- “.....c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate

opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.”

9.14 London Plan (2021) Policy GG2 (Making the best use of land) builds on para 120 of the NPPF (2021) and seeks to create successful sustainable mixed-use places that make the best use of land. Development must:

- “.....a) enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites.....

- c) proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling;

- d) applying a design-led approach to determine the optimum development capacity of sites “

9.15 The application site is currently unoccupied and has not been intensively optimised. The site offers a potential location for residential accommodation and the proposed 100 residential units could deliver much needed affordable and private housing stock to the borough on a designated brownfield site. Notwithstanding the in-principle objection to the loss of the public house, the residential-led redevelopment of the site could potentially be supported.

9.16 However, the development must also be judged on its full merits, including assessment in relation to material considerations including the loss of the existing public house, the impact of the proposal on the character and appearance of the area and the attainment of appropriate scale, design, amenity and play space, parking provision, residential amenity and privacy, in order to achieve a development that integrates appropriately into its surroundings.

Housing Need and Tenure mix:

Affordable housing provision

- 9.17 Policy H4 (Delivering Affordable Housing) and H5 (Threshold Approach to Applications) of the London Plan (2021) expect provision of on-site affordable housing on all major development. Policy H4 states that:
- “All major development of 10 or more units triggers an affordable housing requirement.....”
- 9.18 Policy H5 (Threshold Approach to Applications) permits a fast track approach subject to major development proposals meeting a minimum threshold level of affordable housing on gross residential development of 35 per cent. To use the fast track route, development must meet the following criteria in addition to the 35%.
- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
 - 2) be consistent with the relevant tenure split (**30% low-cost rent (London Affordable Rent or Social Rent), 30% intermediate products (including London Living Rent and London Shared Ownership), 40% low-cost rented homes or intermediate products determined by the borough based on identified need**)
 - 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
- 9.19 The development scheme would provide 40 affordable units representing 40% of the total and although meeting the minimum 35% London Plan (2021) threshold for fast track, **no details have been provided with regard to the tenure mix** and the absence of this information means that the scheme could not follow the GLA’s “fast track” route that allows housing schemes that are referable to the GLA to proceed without viability testing. This position has also been confirmed by the GLA.
- 9.20 Without being eligible for the fast track route the applicant needs to provide a full viability assessment in order to establish whether the proposal is policy compliant. No viability assessment has been provided with the application. In the absence of this information, the proposal is not in compliance with the London Plan (2021) policies and therefore cannot be supported on these terms.
- 9.21 The following table illustrates the proposed mix of residential units with a split of 60 (private) and 40 (affordable housing), which in principle meets the requirements of Policy DMD1.

Private			Social		
1bed 2per	2bed 4per	3bed 5/6per	1bed 2per	2bed 4per	3bed 5/6per
17(28%)	12(20%)	31(52%)	15(37.5%)		25(62.5%)

- 9.22 Enfield policies CP3 and DMD1 (Affordable Housing/ Affordable Housing on sites capable of providing 10 units or more) seek a borough wide affordable housing target of 40% and a split of 70% social rent and affordable rent and 30% intermediate. While limited weight is given to the emerging Draft Enfield Strategic Policy H2: Affordable Housing, the policy seeks future development under part 3 (d), to provide 35% affordable housing on all major housing development. As the tenure mix of the proposed affordable housing on site is presently unspecified the scheme cannot be supported.

Dwelling Mix

- 9.23 Policy H10 (Housing size mix) of the London Plan (2021) and Policy CP5 of the Core Strategy (2010) seeks to ensure that new developments offer a range of housing sizes to meet housing needs. The development provides 56% family size accommodation reflecting targets in the SHMA and providing, overall, an acceptable mix of dwellings.

Dwelling size	Number of units	Percentage
1b2p	32	32
2b4p	12	12
3b6p	56	56
Total	100	100%

Development design and character:

- 9.24 According to Section 12 of the NPPF (2021) the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. Paragraph 126 confirms that “The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve” and that “Good design is a key aspect of

sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

- 9.25 Paragraph 130 of the NPPF states that “Planning policies and decisions should ensure that developments are, c) visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 9.26 Policy D3 of the London Plan (2021) expects “all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity”.
- 9.27 According to Policy DMD37 (Achieving High Quality and Design-Led Development) of the Enfield Development Management Policies (2014), locally distinctive or historic patterns of development, landscape and culture that make a positive contribution to quality of life and a place’s identity should be reinforced.
- 9.28 The report of the Building Better, Building Beautiful Commission (January 2020) states that planners should be demanding beauty and refusing ugliness. Furthermore, the latest amendments to the NPPF give more and more importance to good quality design, stating that ‘the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’.
- 9.29 The proposed building would adjoin the railway tracks of Brimsdown Station, it would be located opposite traditional two-storey semi detached houses and adjacent to a mixed use two storey commercial parade and although there are some purpose-built blocks of flats in the close vicinity, the maximum height in the area is currently is no more than four storeys, none of which are adjoining the site.
- 9.30 Although some significant height may be feasible in the redevelopment of the current application site; given the site context on a highly visible corner and next to and surrounded by much lower buildings, the scale, bulk and mass of the current proposal needs to be considered against the policies related to tall buildings.

Scale (Height and Massing)

- 9.31 Paragraph 130 of the NPPF states that
- “Planning policies and decisions should ensure that developments.....
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting...; and
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit...”
- 9.32 Policy DMD8 (General standards for new residential development) states that development should:
- a) be appropriately located, taking into account the nature of the surrounding area and land uses, access to local amenities, and any proposed mitigation measures; and,
 - b) be of an appropriate scale, bulk and massing.
- 9.33 Paragraph A of London Plan policy D9 “**Tall buildings**” defines a tall building as one that is at least 6 storeys or 18 metres tall. Paragraph B states that tall buildings should only be developed in locations that are identified as suitable in Development Plans.
- 9.34 While limited weight is given to the emerging Draft Enfield Local Plan, the Tall Buildings map contained within the Draft (Figure 7.4) illustrates the ‘Transformative Areas’ where tall buildings might be acceptable. The map indicates that tall buildings to mark the station at Brimsdown would be considered potentially appropriate. Whilst the detailed siting and height should be determined on a case by case basis during discussion with planning and design officers, the maximum height considered appropriate at Brimsdown is 15 storeys. This is based on a rigorous assessment of townscape, character and sustainability of the location for higher density development.
- 9.35 Additionally Brimsdown is located in the designated Upper Lea Valley Opportunity Area which has been earmarked in the London Plan for significant growth.
- 9.36 Paragraph C of London Plan policy D9 details how the Visual Impacts; Functional Impacts; and Environmental Impacts of a proposed tall building all need to be considered in detail and that mitigation measures to counter environmental impacts should be identified and designed into the building as integral features from the outset. Finally it states that the cumulative impacts of proposed,

consented and planned tall buildings in an area must be considered when assessing tall building proposals.



- 9.37 Local Plan Policy DMD 43 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.”
- 9.38 Given the low-rise nature of the immediately surrounding area and the definition in the Local Plan, at 21 storeys, the proposed building can be considered as ‘tall’.
- 9.39 Part 3 of Policy DMD 43 states that in the majority of cases sites meeting more than one of the criteria can be considered an appropriate location for a tall building. Part 4 of DMD 43 then goes on to list 8 essential criteria that tall buildings must meet. Development must:
- A. Provide a landmark signifying a civic function or location/area of importance and interest and/or add to the legibility of the area;
 - B. Provide adequate amenity space for all residential units;

- C. Not have a negative impact on existing important and highly visible structures (including other tall buildings);
- D. Take account of the cumulative impact of tall buildings (including consideration of extant permissions);
- E. Exhibit high standards of sustainable design and construction and architectural quality, the latter to include consideration of scale, form, massing, proportion and silhouette, facing materials, night-time appearance and relationship to other structures with particular attention to the design of the base and top of the building;
- F. Contribute to the physical and visual permeability of the site and wider area, aiding legibility and movement;
- G. Contribute positively to the public realm through the relationship to the surrounding environment and, where appropriate, through the provision of high quality public space;
- H. Not harm the amenity of properties in the vicinity through shadowing and overlooking.

9.40 Of these essential criteria it is considered that the proposal does not meet criteria B, C, D, E, F, G or H.

9.41 With regard to the failure related to criteria B, whilst the proposal would create generous private amenity space for all of its residents there are concerns with regard to the juxtaposition of the communal amenity space with the adjacent residential units on floors how useable some of the communal amenity space will be given its location, and how it abuts with some of the residential units. In addition, the proposed scheme is deficient in child play space and the roof level amenity space appears to be accessible from only one of the proposed 4 lifts.

9.42 With regard to the failure related to criteria C and D the cumulative impacts of tall buildings in this locality has not been robustly assessed by the applicant. The NPPF advises the effect of an application on the significance of non-designated heritage assets should be taken into account in determining applications. The NPPF further advises, in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The NPPF provides that, in determining applications, 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 proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 9.43 In this case, whilst there are no significant heritage assets in close proximity to the site, the application is not supported by a detailed Visual Impact Assessment of the impact of the proposed building on short, medium and long range views and on the setting of heritage assets and therefore careful consideration of possible harm to these views has not been undertaken.
- 9.44 The applicant has sought to justify its 21 storeys simply with reference to a recent approval at the nearby site at 241 Green Street (regd no 20/01526/FUL) for a new residential development of up to 16 storeys in height.
- 9.45 Although this nearby development, which has not yet been constructed, would be considerably higher than any surrounding buildings, it is noted that the site context is considerably different. Indeed the 241 Green Street development was a design-led scheme that benefitted from two pre-application stages, plus a progressive design review process. This led to an approved scheme that presents buildings of different heights that step up as they move away from the site's front boundary in order to break up the scale and massing of the buildings, whilst adding articulation with neighbouring lower buildings at the pavement edge.
- 9.46 With regard to the failure related to criteria E the design review process has concluded that the proposed scheme is deficient in many areas on a building that would stand out as a significant landmark, including:
- *The poor relationship between the ground floor and public realm (in terms of active frontage, building access locations etc).*
 - *The management of the shared residential and commercial circulation.*
 - *The arrangement and location of cycle parking in the basement.*
 - *The proposed materials are inappropriate, being too many and without a clear justification based on contextual references.*
- 9.47 With regard to the failure related to criteria F and G, as the proposal envisages virtually total site coverage with buildings, there is little space to enable a coherent functioning public realm that relates beneficially to the site's considerable public facing boundaries. The proposed main building entrance is positioned adjacent to the 'semi-open service yard', with a large vehicle entrance fronting on to the street, leading to unwelcome inactive frontage on the primary frontage of the building and potential for conflict with pedestrians and building users. This is confirmed by the design review process which concluded that:

- *There is a poor relationship between the ground floor and public realm (in terms of active frontage, building access locations etc).*

- 9.48 With regard to the failure related to criteria H, whilst the proposed does not appear to give rise to any significant concern in respect of overshadowing, there are significant concerns with regard to inter-visibility/overlooking and loss of privacy between bedroom windows on the south east side of the proposed block and the neighbouring flats at Langley Court, 243 Green Street.
- 9.49 Although some significant height may be feasible in the redevelopment of the current application site; given the site context on a highly visible corner and next to and surrounded by much lower buildings, the scale, bulk and mass of the current proposal is considered to be excessive and inappropriate in this context and by its design would be overbearing upon its immediate neighbours.
- 9.50 It is considered that the proposed tower has been designed to maximise the development of the site without due consideration to surrounding properties. There is generally no recognisable transition or positive relationship between the scale of the proposed building and that of the more modest neighbouring buildings in its surroundings.
- 9.51 The applicant has not sought to justify the placement of this tall building in this locational context by the use of massing studies or townscape/verified view assessment. As such, the scale, bulk and mass demonstrated in this proposal bears no relation to the surrounding context that will have a dramatic visual impact that would be detrimental to the neighbouring properties and general wider locality. The proposal represents a gross overdevelopment of the site and cannot be supported.
- 9.52 Whilst a contemporary design approach is supported in principle, the design of the proposed building does not acknowledge the design of surrounding buildings, resulting in an out of context and poorly designed scheme. Furthermore, the choice of materials bears no resemblance to the surrounding character and should relate better to the buildings established on Green Street, rather than the industrial area.
- 9.53 The number of different uses being proposed on the site is commendable, but this proposal appears to be trying to achieve too much. With the number of different uses being proposed on a site of this size and established in this location, at a junction with the train crossing, demonstrates how hard the building will have to work to be successful.

Quality of accommodation

Internal Space Standards

- 9.41 London Policy D6 sets out the London Plan criteria to ensure the delivery of new housing of an adequate standard. Despite the adoption of the London Plan (2021), the Housing Supplementary Planning Guidance Document (2016) remains an adopted document and a material consideration in decision making. The DMD contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing)
- 9.42 Policy D6 of the London Plan (2021) and policy DMD8 of the Enfield Development Management Document (2014) set minimum internal space standards for residential development. The Nationally Described Internal Space Standard applies to all residential developments within the Borough and the London Plan Housing SPG adopted in 2016 has been updated to reflect the Nationally Described Space Standards.
- 9.43 The table below illustrates the residential floorspace with the proposed flats. It confirms that the individual flat sizes would comply with the Nationally Described Space Standard.

Unit Size	Floorspace range	Minimum required	Criteria met?
1 Bed 2 person	50m ² – 59m ²	50m ²	Yes
2 Bed 4 person	74m ² – 78m ²	70m ²	Yes
3 Bed 5 person	89m ² – 97m ²	86m ²	Yes

- 9.44 All the proposed flatted units would have a generally well-designed flexible and functional layout with adequately sized rooms and have direct access to private amenity space.

Light, Outlook and Layout

- 9.45 Given that all the residential units are located above atrium level and the fact that the application site is a peninsula with considerable distance to neighbouring

properties, it is considered that the proposed residential units would have a pleasant outlook and open views to the surrounding area.

- 9.46 The development provides a considerable amount of single aspect units, half of which are North/West facing, while the remaining half are facing South/East. This would result in issues relating to lack of cross-ventilation, overheating for the south facing units and limited daylight/sunlight for the ones facing north.
- 9.47 The lack of natural light in the cores is a concern and does not provide positive arrival spaces for each apartment.
- 9.48 It is considered that the internal layout of the scheme would need to be reconsidered to address these points. The detailed internal arrangements of the block are not supported.

Privacy

- 9.49 Within the tower itself, the primary windows of all the habitable rooms of the proposed apartment block would enjoy a satisfactory level of privacy for all the upper levels. The oval footprint of the tower, with windows and private amenity looking outward at considerable distances to surrounding buildings would ensure high levels of privacy for future occupiers.
- 9.50 However it is considered that the privacy could be compromised for the residents of the 1st, 6th and 11th floors. This is because the residential units on these levels would abut the external communal amenity areas situated on these floors. Given that there would be no defensible space between the communal areas and the flats, this would compromise the quality of the amenity for the future residents of these flats.
- 9.52 The inclusion of privacy screens and obscure glazing could potentially reduce any overlooking, but potentially to the detriment of outlook from these flats and their internal levels of light. The security of the residential units on these levels would also be compromised by this conflict.
- 9.53 As such it is considered that the floors where residential units abut communal amenity space need to be completely redesigned. The impact of the poor design upon the security and privacy levels for the future occupiers of these flats would also constitute a reason for refusal.

Impact on neighbouring amenity:

- 9.67 London Plan Policy D6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 9.68 Meanwhile Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Lastly Enfield Policies DMD6 and DMD8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.
- 9.69 The application site is a kite shaped plot of land that adjoins public highway land and railway tracks in two of the sides and the flank elevation of the adjoining buildings. As such given its relationship with neighbouring properties it is not considered to have an acceptable impact in terms of privacy, overlooking and overbearing impact for neighbouring properties.
- 9.70 There is significant concern with regard to the impact of the proposed tower and its windows to habitable rooms on its south eastern side from the first floor upwards and their close proximity to habitable room windows at the norther end of the adjacent residential block called Langley Court at 243 Green Street. The levels of inter-visibility at a distance of less than 6 metres would give rise to unacceptable conditions of overlooking and loss of privacy. This distance is closer for the southern extent of 1st floor amenity space that is located on this adjacent boundary.
- 9.71 The applicant has sought to justify the impact of the proposed development in terms of light levels by their submitted Daylight and Sunlight report (Dated 6 November 2021 by Right of Light Consulting) which assesses the impact of the development on the light receivable by the neighbouring properties at 1 to 15 (odd) Brimsdown Avenue, 1, 1a, 7, 8, 20, 22, 25, 31, 40 Jute Lane, 2, 4, 6 Osborne Road, 22 Enstone Road, 241 to 257 (odd), 342 to 356 (even) Green Street, 29, 31, 38, 40, 42, 44 Goldsdown Close, 34, 35, 36, 37 to 44 Stonycroft Close and Brimsdown Station House, Green Street.

- 9.72 The submitted report confirms that a total of 1039 windows were tested, of which, 522 have a requirement for daylight. Of the 522 windows, 47 fall short of the Vertical Sky Component test which equates to a pass percentage of 91%.
- 9.73 The study also undertook a Daylight Distribution test. In this case, a total of 96 rooms were tested, of which 56 have a requirement for daylight. All rooms with a requirement for daylight pass the daylight distribution test with the exception of only 2 rooms, which equates to a pass percentage of 96.4%.
- 9.74 All windows which face within 90 degrees of due south were also tested for direct sunlight. All main habitable windows pass both the total annual sunlight hours test and the winter sunlight hours test, with the exception of 10 windows. **However, it appears that at least 4 of these windows appear to serve bedrooms and therefore would not be required to be tested under the BRE guidelines.**
- 9.75 Furthermore, the submitted Daylight & Sunlight report confirms that surrounding gardens and open spaces were tested and meet the BRE recommendations.
- 9.76 As such, on balance, it is considered that the proposed development would have an acceptable impact in respect of loss of light and overshadowing. However, it is concluded that the proposal would have an unacceptable impact on overlooking and privacy to neighbouring/nearby residents, and adversely affecting their living conditions.

External amenity space

- 9.77 Policy DMD9 provides the standards for the level of private amenity space provision for each unit and is primarily based upon the number of rooms and occupancy level. The standards represent the absolute minimum, although regard must also be given to the character of the area.
- 9.78 Policy DMD9 expects dwelling with access to communal amenity space to provide a minimum of 5m² of private amenity space for 1Bed 2Person flats. The requirements of minimum external amenity increase with the flat size, as shown in the following table.

Table 2.1

	Dwelling Type	Average private amenity space (across the whole site)	Minimum private amenity space for individual dwellings
A) Dwellings with access to communal amenity space	1p	N/a	4sqm
	1b2p	N/a	5sqm
	2b3p	N/a	6sqm
	2b4p	N/a	7sqm
	3b4p	N/a	7sqm
	3b5p	N/a	8sqm
	3b6p	N/a	9sqm
	4b5p	N/a	8sqm
	4b6p	N/a	9sqm

- 9.79 All the proposed flats will benefit from private outdoor amenity spaces by way of Balconies in compliance with the table above, as well as a number of communal gardens, located at 1st, 6th, and 11th floors and at roof level.
- 9.80 There is a balance that often has to be met between the positives of passive and natural surveillance obtained through inter-visibility between communal and private spaces and the negatives of lack of privacy that can impact negatively on the quality of residential accommodation. This could possibly be improved with appropriate boundary treatments (i.e. screens/fences/planters, etc) which would need to be further discussed with officers and, should a solution be found, would need to be secured by a condition.
- 9.81 On balance, whilst it is considered that a reasonable quantity of communal amenity space is provided across the site, there are grave concerns that that which is provided at 1st, 6th, and 11th floors may require a significant re-design in order to ensure that the space would be adequately functional so as not to cause significant conflict due to loss of outlook and loss of privacy for the residential accommodation on these floors, contrary to policy DMD9.

On-site Playspace

- 9.82 Policy S4 (Play and informal recreation) of the London Plan (2021) expects on-site play space to be provided for all major developments and additional guidance is provided in the adopted shaping neighbourhoods: play and informal recreation SPG (2012). Policy S4 sets out core expectations of play space.
- 9.83 Residential developments should incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
- provides a stimulating environment
 - can be accessed safely from the street by children and young people independently
 - forms an integral part of the surrounding neighbourhood
 - incorporates trees and/or other forms of greenery
 - is overlooked to enable passive surveillance
 - is not segregated by tenure
- 9.84 Using the GLA population yield calculator a forecast total of 89.1 children are envisaged to be residing within the development between the ages of 1-17. As such, 891 square metres of playspace is required on site meeting the criteria set out above.
- 9.85 In this case, although the applicant has stated that they are providing approximately 535m² of play space, this figure relates to the whole of the external communal external amenity space and not the area specifically designated as playground.
- 9.86 Looking at the submitted drawings only an area of approximately 25 m² has been designated as playground, representing a significant shortfall in the required on-site provision and insufficient to meet the demands of future occupiers.
- 9.87 Furthermore, the area identified as playground is situated on the roof of the proposed tower block and as a result of its location it would fail to comply with several of the requirements of the London Plan Policy S4, as it cannot be accessed safely from the street by children, would not form an integral part of the surrounding neighbourhood and would not be overlooked enabling passive surveillance. Therefore, the location of the playground is not only considered to be insufficient in terms of the quantum proposed but would also be considered to be of poor quality and as such contrary to Policy S4 (Play and informal recreation) of the London Plan (2021).

Accessible units

- 9.88 London Plan Policy D7 requires at least 10% of new dwellings to constitute Building Regulations M4(3) wheelchair user dwellings. No details have been provided with regard to this requirement, however, provided in principle this could be accommodated within the scheme such provision could be secured by conditioned in case of approval. In the circumstances it is not considered to be a reason to warrant refusal.

Sustainable Drainage:

- 9.89 Policy SI 12 of the London Plan (2021) outlines that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield runoff rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63.
- 9.90 Policy DMD61 (Managing Surface Water) of the Enfield Development management Policies (2014), state that a Drainage Strategy will be required for all developments to demonstrate how proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan. All developments must maximise the use of and where possible, retrofit Sustainable Drainage Systems (SuDS) which meet the relevant requirements in terms of suitability, quantity, quality and functionality.
- 9.91 The applicant has submitted a Drainage Strategy Report (March 2021, prepared by McCloy Consulting) and a Flood Risk Assessment (March 2021) to justify the development against drainage policies. The Council's sustainable drainage officer has reviewed the details and has raised serious concerns in regards to the impact of the proposed development in terms of flooding and concerns with the proposed drainage strategy.
- 9.92 Sustainable drainage colleagues have confirmed that the submitted Flood risk Assessment does not demonstrate that the development is safe from flooding and that it will not increase flood risk elsewhere.
- 9.93 SuDS officers have also confirmed that the proposed SuDS strategy does not meet the requirements of policy DMD61 for the following reasons:

Suitability

- The London Plan Drainage Hierarchy has not been fully followed.
- Source control SuDS measures have not been utilised for all the hardstanding and roof runoff.

Quantity

- A 2L/s discharge rate is not greenfield runoff rate for 1 in 1 year and 1 in 100 year (plus climate change).
- A lower discharge rate can be utilised if source control SuDS measures are utilised extensively across the site.
- The information provided in the drainage strategy is conflicting.
- Information such as the depth of the sub-base for the permeable paving has not been included and therefore it is not clear how greenfield runoff rates will be achieved

Quality

- Source control SuDS measures must be used extensively for the hardstanding and roof areas.
- Only half the roof runoff will drain via a green roof. The developers should aim to provide source control for 100% of the roof and hardstanding areas

Functionality

- A detailed drainage plan including levels and drainage runs has not been provided.
- Cross sections, sizes and specifications of the proposed SuDS features must be provided
- Overland flow routes for exceedance events including spot levels must be submitted
- The Management Plan for future maintenance must be submitted (which includes any flood risk mitigation where necessary)

- 9.94 In lieu of the required information the applicant has failed to adequately provide a comprehensive sustainable drainage strategy to clarify how the development shall meet Greenfield Runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) events and utilise Sustainable Urban Drainage Systems(SuDS) in accordance to the London Plan Drainage Hierarchy and the principles of a SuDS Management. The proposal fails to accord with Policies SI12 and SI13 of the London Plan (2021),

Policy CP21 and CP28 of the Enfield Core Strategy (2010) and Policy DMD61 of the Enfield Development Management Document (2014).

Highway and transport implications:

- 9.95 London Plan (2021) Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards. Policies T6 and T6.1 to T6.5 set out car parking standards.
- 9.96 Policy DMD47 seeks new access, new roads and serving to be suitable for pedestrians, cyclists and appropriately sited vehicular access and serving configuration whereby there is no adverse impact on highway safety and the free flow of traffic. 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”.

Vehicle Parking

- 9.97 Policy DMD45 seeks to minimise car parking and to promote sustainable transport options. The Council recognises that a flexible and balanced approach needs to be adopted to prevent excessive car parking provision while at the same time recognising that low on-site provision sometimes increases pressure on existing streets.
- Car parking proposals will be considered against the standards set out in the London Plan and:*
- a. The scale and nature of the development*
 - b. The public transport accessibility (PTAL) of the site;*
 - c. Existing parking pressures in the locality;*
 - d. Accessibility to local amenities, and the needs of the future occupants of the developments.*
- 9.98 Policy T6 of the London Plan (2021) states “car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy. The policy goes on to state “an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to

implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets”.

- 9.99 The site is located within an area with a 3 PTAL level in an Outer London designation and therefore car free would not be appropriate. The parking guidelines in Policy T6.1 table 10.3 of the London Plan (2021) supersede the Enfield car parking standards and are only maximum standards. As such an assessment based on the balance between less car derived transport and more sustainable methods, versus the transport needs of future occupiers.

Residential parking provision

- 9.100 Thirty-eight (38) car spaces are proposed for the 100 residential units. Considering the proposed dwelling mix and based on the London Plan Parking Standards, the site should be providing a maximum of 117 parking spaces (see table 1).

TABLE 1: LONDON PLAN 2021 PARKING STANDARDS							
		PTAL DEPENDENT (3)		TOTAL			
Unit type	No.	MAX		MAX RANGE		Provision	Ratio
1xbed	32	24	24	117	117	38	0.38
2xbed	12	9	9				
3xbed	56	84	84				
4xbed	0	0	0				
TOTAL	100	117	117				

- 9.101 The provision of 38 parking spaces is well below the maximum standard of 117 and however it should be noted that the standard is a maximum and provision below this level is often still acceptable, notwithstanding the above, it is considered that the provision of only 38 spaces would not be acceptable, **taking into account the fact the site is not within a CPZ and the high number of 3 x bed units proposed (56).**
- 9.102 **Accordingly, the transport officer has assessed the scheme and considers the parking provision not to be satisfactory and confirmed that the proposed scheme would result in parking overspill and unacceptable on street parking pressures.**

Commercial parking provision

- 9.103 The proposed scheme also includes 907m² of retail space, 362m² of office space and 365m² of restaurant floorspace. The commercial units will also generate a parking demand, the estimated parking requirement for the proposed commercial uses (Class E) is (as shown in Table 2) 32 spaces.

TABLE 2: Parking requirement for the Class E uses				
Use	Use class	Area (sqm)	LP Parking max requirement (space/sqm)	Max Requirement
Commercial space (non-food)	Class E	907	1/50	18
Office	Class E	362	1/100	7
Restaurant	Class E	335	1/50	7
				32

- 9.104 As such it is considered that the parking provision of four spaces for the proposed commercial uses is insufficient. This was confirmed by the transport officer who also confirmed that this short fall is likely to result in parking overspill and unacceptable on street parking pressures.

Vehicle Parking Layout and access

- 9.105 The proposed vehicular parking spaces within the car park meets the minimum dimensions required by policy, including the disabled bays. Tracking has been provided to show the bays can be accessed and egressed independently.
- 9.106 The Council transport officer has expressed concerns that there is only space for one-way movement within the car park, and the lack of waiting bays could cause problems for vehicles accessing and exiting at the car park.

- 9.107 The provision of a car lift is also a concern; in that it could potentially break down and result in no alternative parking apart from on street parking. Car lifts are generally unsupported in development schemes in the borough in line with policy DMD45 which also requires that turntables and car stackers are designed out.
- 9.108 The proposal also includes 4 short-stay spaces at ground floor level, accessed through a new crossover next to the existing level crossing. Transport officers have concerns with regard to the access to those four spaces, as in this location, there could be issues with queues from the level crossing obstructing the access. These concerns were shared by Network Rail.

Servicing

- 9.109 The proposed development provides a service area off street, accessed from the shared access to the basement parking. The off-street service yard is welcomed, although there are some concerns that car park access isn't independent from the yard.
- 9.110 The shared access between the service yard and the access to the car park and car-lift is conflicting and could cause problems and potentially affect the traffic flow. The vehicle movement associated to the residential parking, conflicts with delivery/service vehicles. The total number of service and delivery vehicles could be problematic, as there are the Class E units plus the high number of car free units, therefore more deliveries, all competing for the space.
- 9.111 This arrangement is not acceptable and a reason for refusal due to the impact upon the safety of the public highway.

Cycle storage

- 9.112 The submitted Design & Access Statement confirms that a total of 324 cycle storage spaces, 162 on each basement level. Based on the London Plan standards a total 184 spaces would be required for the residential use and 18 for the commercial uses. As such the proposed 324 spaces would well exceed this requirement.
- 9.113 However, it is noted that none of the proposed cycle spaces are secure and as such do not comply with the policy requirement. Further, the basement location of the cycle storage is neither convenient for future occupiers/users, nor accessible and as such not considered to be acceptable.

Trees, Landscaping & Biodiversity:

Trees

- 9.114 Chapter 12 para 131 of the NPPF adds weight to the need for trees to be provided in visually enhancing locations such as streets. Para 131 states,

“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that opportunities are taken to incorporate trees elsewhere in developments...”

- 9.115 London Plan Policy G7 states that where development proposals result in the removal of trees, adequate replacement trees should be planted based on the existing value of the trees to be removed. Images of the site suggest there are a number of existing trees on the site, however an analysis of the trees on the site, all of which would be felled in order to facilitate the development, has not been provided as part of the application submission.

Landscape quality

- 9.116 Policy G5 of the London Plan (2021) outlines that major development proposals should contribute to the greening of London by incorporating measures such as high-quality landscaping, green roofs, green walls and nature based sustainable drainage. The policy also recommends an Urban Greening Factor (UGF) target score of 0.4 for developments that are predominantly residential.

- 9.117 The applicant has not provided an UGF calculation in respect of this proposal and the green infrastructure of the proposal has been insufficiently specified and consequently does not contribute to the greening of London as required by Policy G5 of the London Plan (2021). Accordingly this aspect of the proposal cannot be supported.

Ecology impacts

- 9.118 Policy G6 of the London plan (2021) states “development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process”. The applicant has submitted an Ecological Appraisal

that in recognition of the loss of all the trees on site recommends that they are felled outside of the bird breeding season. It also refers to some broad measures of ecological enhancements that could potentially be applied to the scheme, although this is not specific and does not attempt to quantify the Biodiversity Net Gain.

Energy & Carbon emissions:

- 9.119 Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan (2021) expects major development to be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance.
- 9.120 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
 - 2) off-site provided that an alternative proposal is identified and delivery is certain.
- 9.121 Should a scheme come forward that could be supported by officers, it is recommended that to optimise the reduction in carbon emissions in order the developer should connect the development to the Council's Decentralised Energy Network which is presently extends to less than 2 kilometres away from the site.

Fire Safety

- 9.122 No fire safety strategy, prepared by suitably qualified consultant, has been submitted with the application, contrary to Policy D12 of the London Plan. Were the planning

application and fire safety strategy considered acceptable, it would have been recommended that the strategy be secured by condition.

10. Community Infrastructure Levy

10.1 As of April 2010, legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development, in order to enable the funding of a wide range of infrastructure that is needed as a result of development.

Mayoral CIL

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

Enfield CIL

10.3 As of 1 April 2016 Enfield has been charging CIL at the rate of £60 per square metre (Lower Rate CIL Zone) index linked from April 2016.

10.4 In this instance the development would be Mayoral and Enfield CIL liable however, as the affordable housing provision (which benefits from CIL relief) has not been resolved it is not possible to calculate the expected liability.

11.0 Public Sector Equalities Duty

11.1 In line with the Public Sector Equality Duty the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions including decision making on planning applications. These considerations include: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

11.2 The key elements of the Proposed Development which have an impact that could result in an equalities effect include the design and physical characteristics of the proposals subject of the planning application. Officers are unable to fully consider

the impacts of the proposal as an Inclusive Design statement has not been submitted with the application. However, it is not considered that the proposal to refuse planning permission for this development would disadvantage people who share any of the different nine protected characteristics compared to those who do not have those characteristics and therefore do not consider there would be a disproportionate equalities effect. Accordingly, the recommendation is considered appropriate in upholding the council's adopted and emerging policies and is not outweighed by any engaged rights.

12. Conclusion

Presumption in Favour of Sustainable Development

- 12.1 In the years up to and including 2020, Enfield delivered 56% of its 2,328 homes target. In the monitoring period from 1 April 2020 to 31 March 2021 Enfield delivered 70% of its 1,246 homes target. This means that Enfield has continued to fail to meet central government's Housing Delivery Test as set out in the National Planning Policy Framework 2021. As stated in paragraph 11(d) of the NPPF, the relevant development plan policies should, therefore, be considered out of date and planning permission should be granted unless:
- i the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or,
 - ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 12.2 The assessment of this application has been made first against the development plan policies and then against the NPPF and other relevant material considerations in line with s.70(2) of the Town and Country planning Act 1990 (as amended) and s.38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which require that applications for planning permission are made in accordance with the provisions of the development plan unless material considerations indicate otherwise.
- 12.3 The NPPF is a material consideration, not a part of the statutory development plan. As there are policies in the development plan that would otherwise not be out of date were it not for the borough's failure to meet the Housing Delivery Test, any assessment of this type of application requires some assessment of the proposal

against these development plan policies prior to the application of the presumption in favour of sustainable development.

12.4 The above assessment against the development plan policies has produced the following conclusion:

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

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

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

12.6 Whilst it is clear that the provision of 100 new homes, together with potentially a significant proportion of affordable housing are positive merits of the proposal and would be of considerable public benefit, it is considered that the shortcomings of the scheme, described in detail in the report above would not be outweighed by these benefits.

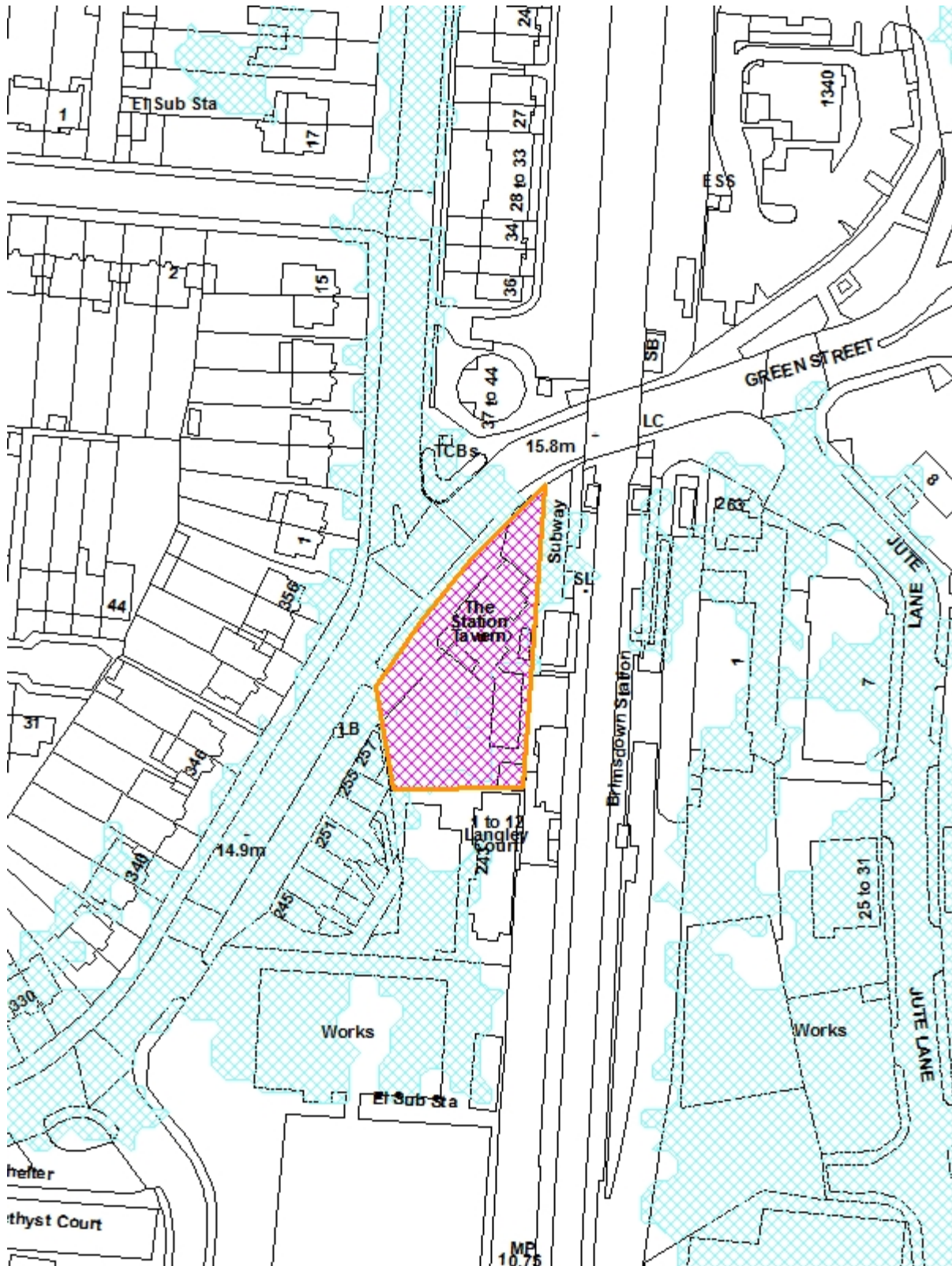
12.7 For the reasons considered above whilst the Council merits of the proposal these have been assessed against the policies of the development plan and other material planning considerations. Officers consider that on balance the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

13.0 Recommendation

- 13.1 That, PLANNING PERMISSION BE **REFUSED** for the reasons stated in section 2 of this report.

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

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



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North



1. NOTE FOR MEMBERS

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

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

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

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

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

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

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

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

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

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

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

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

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

2. RECOMMENDATION:

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

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

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

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

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

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

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

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

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

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

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

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

3. CONSULTATION

Public Response

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

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

3.4 Comments from the letters of support are summarised below:

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

Officer response to comments

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

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

Statutory and Non-Statutory Consultees:

Internal Consultations:

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

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

4. ASSESSMENT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- Revised information: No change building form/site arrangement/ detailed design – however intention of restricted access provided
 - Report for Planning Committee on 19th July 2022: Privacy cited at paragraphs 9.49 – 9.53
- 4.75 Within the tower itself, the primary windows of all the habitable rooms of the proposed apartment block would enjoy a satisfactory level of privacy for all the upper levels. The oval footprint of the tower, with windows and private amenity looking outward at considerable distances to surrounding buildings would ensure high levels of privacy for future occupiers.
- 4.76 However, it is considered that the privacy could be compromised for the residents of the 1st, 6th and 11th floors. This is because the residential units on these levels would abut the external communal amenity areas situated on these floors. Given that there would be no defensible space between the communal areas and the flats, this would compromise the quality of the amenity for the future residents of these flats. The inclusion of privacy screens and obscure glazing could potentially reduce any overlooking, but potentially to the detriment of outlook from these flats and their internal levels of light. The security of the residential units on these levels would also be compromised by this conflict.
- 4.77 In seeking to address this matter, the submitted documents indicate that the first floor level communal external amenity space to the east and all external communal

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

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

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

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

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

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

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

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

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

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

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

Community Infrastructure Levy (CIL)

Enfield CIL

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

Mayoral CIL

- £60 x deemed net chargeable area

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

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

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

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

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

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

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

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

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

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

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

escape, areas to stay put, smoke ventilation systems proposed, the access routes and the lack of suppression methods (sprinkler systems) in key areas of the building including the car park, are contrary to the relevant guidance and therefore raise significant concern. In addition, the submitted Fire Statement, acknowledging the building height exceeds 50m, fails to provide a required Quantitative Design Review.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5. CONCLUSION

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

- 5.3 Officers are also mindful of the Housing Delivery Test and the *Presumption in Favour of Sustainable Development*. In the years up to and including 2020, Enfield delivered 56% of its 2,328 homes target. In the monitoring period from 1 April 2020 to 31 March 2021 Enfield delivered 70% of its 1,246 homes target. This means that Enfield has continued to fail to meet central government's Housing Delivery Test as set out in the National Planning Policy Framework 2021. As stated in paragraph 11(d) of the NPPF, the relevant development plan policies should, therefore, be considered out of date and planning permission should be granted unless:
- i the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or,
 - ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 5.4 The assessment of this application has been made first against the development plan polices and then against the NPPF and other relevant material considerations in line with s.70(2) of the Town and Country planning Act 1990 (as amended) and s.38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which require that applications for planning permission are made in accordance with the provisions of the development plan unless material considerations indicate otherwise.
- 5.5 The NPPF is a material consideration, not a part of the statutory development plan. As there are policies in the development plan that would otherwise not be out of date were it not for the borough's failure to meet the Housing Delivery Test, any assessment of this type of application requires some assessment of the proposal against these development plan policies prior to the application of the presumption in favour of sustainable development.
- 5.6 The above assessment against the development plan policies has produced the following conclusion:

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

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

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

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

5.9 For the reasons considered above whilst the Council recognises the merits of the proposal, these have been assessed against the policies of the development plan and other material planning considerations. Officers consider that on balance the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

6. RECOMMENDATION

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