

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 19th September 2023

Report of
Director of Planning &
Growth - Brett Leahy

Contact Officers:
Eloise Kiernan
Claire Williams

Category
Major

Ward Southbury

Councillor Request No

LOCATION: Moorfield Family Centre, 2 Moorfield Road, Enfield, EN3 5PS

APPLICATION NUMBER: 20/03011/FUL

PROPOSAL: Demolition of the existing building and the erection of a new residential development (Class C3) with associated works including hard and soft landscaping, car and cycle parking and amenity space. (Revised Description)

Applicant Name & Address:
Social Housing plus Moorfield Road
71-75 Shelton Street
Covent Garden
London
WC2H 9JQ

Agent Name & Address:
Mr Matthew Lloyd-Ruck
Savills, 33 Maragret Street
London
W1G 0JD

RECOMMENDATION:

1. That planning permission be **GRANTED** subject to conditions and the completion of a S106 legal agreement
2. That the Head of Development Management be granted delegated authority to finalise the wording of the S106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.



Reproduced by permission of Ordnance Survey on behalf of HMSO. ©Crown Copyright and database right 2013. All Rights Reserved. Ordnance Survey License number 100019820

Scale 1:1250

North



1. **Note for Members**

1.1 This application was first considered by the Planning Committee on 29 March 2022. Members supported the officer's recommendation to refuse planning permission for the reasons set out below. Following the March 2022 planning committee, the applicant has sought to address the four reasons for refusal and has held extensive discussions with the Local Planning Authority on a revised scheme.

1. The development by virtue of its size, bulk, massing, proximity and siting to neighbouring occupiers would give rise to an unneighbourly loss of sunlight and daylight and unneighbourly sense of enclosure, as perceived from neighbouring properties including Nos.4 – 16 Moorfield Road, 1 to 43 Moorfield Road and 253 to 273 Hertford Road, causing harm to the occupiers residential amenity, which having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation, contrary to Policies D3 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010), DMD8, DMD10 and DMD11 of the Enfield Development Management Document (2014) and the policies of the National Planning Policy Framework 2021 taken as a whole.
2. The proposed development, by virtue of its siting, bulk, mass, lack of defensible space, poor quality outlook and proximity to existing and proposed replacement trees represents an overdevelopment of the site and 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 including affordable residential accommodation. would cumulatively result in substandard accommodation and be harmful to the amenities of future occupiers, contrary to Policy D6 of the London Plan 2021, the Nationally Described Space Standards 2015, Policies CP4 and CP30 of the Enfield Core Strategy 2010, Policy DMD6, DMD8 and DMD37 of the Enfield Development Management Document 2014.
3. The proposed development, in the absence of a legal agreement securing contributions to the extension of the controlled parking zone, would contribute unacceptably to parking congestion in the surrounding area which would give rise to conditions prejudicial to the free flow and safety of vehicular traffic and pedestrians, and promote the use of non-sustainable modes of transport, contrary to Policies T6 of the London Plan 2021, Policy CP25 of the Enfield Core Strategy 2010, Policies DMD45, DMD47 and DMD48 of the Enfield Development Management Document 2014.
4. The proposed development, by reason of its impact upon the preserved trees and the loss of B category trees at southern end of the application site would result in harm to amenity which having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation contrary to Policies DMD37 and DMD80 of the Enfield Development Management Document (2014), CP30 of the Enfield Core Strategy (2010), G7 of the London Plan (2021), the National Planning

Policy Framework 2021 as a whole and the British Standard for Trees in relation to design, demolition and construction (BS 5837:2012).

2. **Executive Summary**

- 2.1 This report seeks approval from Members for the demolition of the existing building on the site, a former NHS practice, and redevelopment of the site to provide a part 3, part 8 and part 12 storey building (including ground floor), delivering 100 residential units at social rent, equivalent to 60% of market rent.
- 2.2 Compared to the previous scheme, the revised development has a slightly lower number of units (100 instead of 106), continues to provide 100% affordable housing, addresses the loss of existing trees, and includes 9 car parking spaces. The number of car parking spaces has not been changed compared to the previous scheme. However, the appearance and height of the building has changed significantly.
- 2.3 The scheme presented to committee in 2022 was a monolithic 9 storey building, whilst the revised building, with its staggered approach, is of higher design quality and, on balance, does not unduly harm the townscape character of the locality, sufficient to outweigh the benefits of the proposal.
- 2.4 Overall, the bulk and massing of the building has improved. The staggered approach gives interest to the design, while ensuring that there will not be harm to the residential amenity of neighbouring occupiers, with regards to loss of sunlight and daylight, and sense of enclosure. This is a significant improvement on the 2022 scheme and addresses reason for refusal no. 1.
- 2.5 The 3 and 8 storey elements are considered appropriate and make a positive contribution to the townscape. The 12 storey element, when viewed in the wider context, complements the height of Hastings House without appearing overly tall. Closer views show that this element will inevitably be perceived as prominent in the local context, especially since this is a corner location. However, the constraints of the site do not allow a larger set back from Carterhatch Lane without negatively affecting the scheme.
- 2.6 The siting of the building has been re-positioned to the south-west to address officers' concerns raised with the previous scheme. The applicant has demonstrated that, due to the physical constraints of the site, an alternative footprint that retains the existing trees on Carterhatch Lane and with a larger buffer from the site's boundaries, would result in significantly fewer residential units, an increased percentage of small units, no M4(3) compliant units and no 2 bed units (4 people) that would comply with the Nationally Described Space Standards. For this reason, and in the context of the 100% affordable housing offer, which is given significant weight, the 12 storey element of the proposal is considered acceptable, on balance. This addresses reason for refusal no.2.
- 2.7 Should Members be minded to pass a resolution to grant planning permission, a legal agreement will be signed to secure an extension of the controlled parking zone in the area, as well as contributions towards the local public transport and cycling infrastructure, and other items. This addresses reason for refusal no.3 of the previous scheme.
- 2.8 The siting of the building leads to the loss of several category B trees fronting Carterhatch Lane. Whilst this is regrettable and was a reason of concern in the 2022 scheme, the applicant has been able to demonstrate that an alternative siting would not be desirable. The Arboricultural Officer confirmed that, subject to conditions, they

are satisfied that the proposed footprint of the building will protect the retained trees (including 5 TPOs) and that the replacement provision is satisfactory. This addresses reason for refusal no.4 of the previous scheme.

- 2.9 This is a brownfield site which has been vacant for the past 6 years. It is now boarded up, to avoid instances of vandalism and anti-social behaviour. The 2022 Committee Report confirmed that, taking into account both the housing need of the Borough together with the track record of delivery against target, the Council must seek to optimise development on brownfield sites, particularly those that are currently underused and not delivering any benefit to the wider area, such as 2 Moorfield Road.
- 2.10 The delivery of housing on underutilised brownfield sites in sustainable locations (despite the low PTAL rating, the site is well connected to bus services) and within close proximity to a designated local centre (in this case, Enfield Highway Local Centre), has strong planning policy support and is afforded substantial weight in the planning balance.
- 2.11 Developing existing brownfield land can help in safeguarding 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.
- 2.12 The proposal would support London Plan policies, which seek to increase housing supply and optimise site capacity. Although the site has a PTAL score of 2, the site is considered to be in a location suitable for delivery of new high-quality housing.—.
- 2.13 The proposed development includes 100 new residential units, 100% social rent (equivalent to 60% market rent), with a unit mix which is supported by the Housing Officer. This would contribute high quality housing stock to the Borough to meet housing need, which continues to rise in the Borough.
- 2.14 There is a pressing need for housing, including affordable housing, within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. Past delivery against housing targets accentuates this need and taking account of the presumption in favour of approving sustainable development and the tilted balance which currently applies, it is considered that the proposed development would deliver a high quality residential development on existing brownfield land,— in a location suitable for the proposed use.
- 2.15 Overall, the proposal would make a meaningful contribution towards Borough and wider London housing needs, helping Enfield to support its growing population.

3. Recommendation

- 3.1 That planning permission be **GRANTED** subject to conditions and the completion of a S106 legal agreement.

Conditions:

1. Time limit – 3 years
2. Approved plans
3. Materials – drawings, samples and sample panels
4. Boundary Treatment/s
5. Playspace Design
6. Landscaping – details and management plan

7. Public realm strategy
8. Biodiversity enhancements
9. Rainwater harvesting details
10. Secure by Design
11. Inclusive Design - M4(2) and M4(3) - include percentage 90% and 10%
12. Sustainable Drainage Strategy
13. Sustainable Drainage Strategy - Verification Report
14. Lighting Details / Plan (Building & Communal Amenity Space)
15. Site Waste Management Plan
16. Acoustic Report
17. Noise Mitigation Measures (future occupants)
18. Disabled Parking
19. Car Park Management Plan (Final)
20. Details of Cycle Parking
21. Delivery and Servicing Management Plan (operational)
22. Construction Logistics Management Plan (CLMP)
23. Construction Resource Management Plan (CRMP)
24. Arboricultural Method Statement with Tree Protection Plan
25. Habitat Survey (Phase 1)
26. Contaminated Land – Remediation
27. Contaminated Land – Verification
28. Energy Statement – management and maintenance
29. Thermal Comfort – further details of wind effects and related mitigation
30. Green Procurement Plan – details for how the procurement of materials for development will promote sustainability
31. Details of any Rooftop Plant, Extract Ducts and Fans incl. Plant Ac. Report
32. Details of any rooftop plant, extract ducts and fans (appearance)
33. Fire evacuation lift (details / management)
34. Electric vehicles
35. Taxi stand details
36. PD restriction on satellite equipment
37. No plant equipment to be fixed to external face of building
38. No roller shutters to be fixed to external face of buildings

3.2 That the Head of Development Management 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 listed above.

4. **Site & Surroundings**

4.1 The site occupies a prominent position at the junction with Hertford Road, Carterhatch Lane and Moorfield Road. The site comprises a two-storey rectangular building, set back from Hertford Road and Carterhatch Lane with a car park to the rear off Moorfield Road.

4.2 The existing site building is rectangular in form and utilitarian in appearance, with several recessed elements and a central lightwell.

4.3 The existing building is now vacant, having previously been occupied by the Barnet, Enfield and Haringey Mental Health Trust, a local authority children services team and a GP Practice, all likely within Use Class E(e) - Commercial, Business and Service. The site was sold by the NHS as surplus to requirements.

4.4 The site is now boarded up, to avoid instances of vandalism and anti-social behaviour. Prior to the building being closed off to the public, the building was largely obscured

from public view, given its siting set back from the road and the presence of trees, several of which are the subject of tree preservation orders (TPO), and vegetation located on boundary, particularly along Hertford Road and Carterhatch Lane. Vehicular access to the site is via Moorfield Road, whilst pedestrian access is primarily via Carterhatch Lane.

- 4.5 The site has a Public Transport Accessibility Level (PTAL) rating of 2 (poor). It is located a 20 minute walk to Brimsdown railway station to the east and Southbury Overground station to the south. Despite the low PTAL rating, the site is well connected to bus services that serve the local area, and provide links to Central London. There are bus stops within 100m of the site on Hertford Road and Carterhatch Lane, with buses running every 3-5 minutes. There are also bus stops further to the west, on Great Cambridge Road, some 900m from the site.
- 4.6 The building is located within a busy mixed-use area, north-west of the Enfield Highway Local Centre, on Hertford Road (A1010). Despite the current poor PTAL level, it is noted that Hertford Road is becoming increasingly urban in character, being a main thoroughfare running north to south, where local centres and concentrations of activity, including a range of social and community uses such as schools, GP surgeries, open space and small parades of shops are located surrounded by built up neighbourhoods.
- 4.7 To the north of the site are the neighbouring properties of Nos. 4 -16 Moorfield Road, a two storey row of dwellings, the rear elevations and gardens of which, face onto and are contiguous with the full extent of the site.
- 4.8 To the east of the site is Hertford Road, beyond which are Nos. 233 - 249 Hertford Road (set to the north of Carterhatch Lane) and 253 - 273 Hertford Road (set to the south of Carterhatch Lane), a variety of building typologies from single to four storeys in height, primarily consisting of commercial activities at ground floor level with residential activities at upper floor levels, except No.241 Hertford Road, a purpose built residential block on the corner with Cedar Avenue.
- 4.9 To the south of the site is Carterhatch Lane, beyond which is No.43 – 45 Carterhatch Lane, one of several four to five storey purpose built residential blocks, along with a greened apex, consisting of several trees, at the junction with Hertford Road Carterhatch Lane.
- 4.10 To the west of the site is Moorfield Road, beyond which is No.1 – 43 Moorfield Road, one of several four to five storey purpose built residential blocks.
- 4.11 It is also worth noting that there is a 14 storey building to the south-west of the site, built in the 1980s, known as Hastings House. The building, located on 2 Sherbourne Avenue, is set back from Carterhatch Lane and is a prominent feature in the local townscape. Further towers can be found on Eastfield Road, some 10 minutes' walk to the north-east of the site and on Ordnance Road further to the north.
- 4.12 The site is neither located in or adjacent to a conservation area. The site is neither statutorily nor locally listed.
- 4.13 The following policy designations / characteristics apply to the site/adjacent to the site:
 - Southbury Ward.
 - Flood Defence 100 year - 1000m.
 - North East Enfield Area Action Plan.
 - Tree Preservation Order (TPO) (ref:403/2018): there are five trees sited along

- the boundary with Moorfield Road and Hertford Road.
- Enfield Highway Local Centre.

5. Proposal

5.1 The description of development is:

‘Demolition of the existing building and the erection of 100 new affordable residential development (Class C3) with associated works including hard and soft landscaping, car and cycle parking and amenity space.’

5.2 The proposal seeks the following:

- The demolition of existing two storey centre for the provision of medical and/or health services (1300sqm).
- The redevelopment of the site to form a part 3, 8 and 12-storey residential block (including ground floor, height 41.90m / 28.40m / 12.15m respectively) consisting of 100 flats in the following arrangement:
 - 42 x 1 Bedroom 2 Person (of which 12 would be WC)
 - 2 x 2 Bedroom 3 Person
 - 38 x 2 Bedroom 4 Person
 - 18 x 3 Bedroom 5 Person

5.3 The redevelopment would include:

- 100 flats which would be 100% Affordable Housing at social rent, equivalent to 60% market rent
- 9,262sqm of residential floorspace (GIA)
- 51.8sqm for the internal refuse facility at ground floor level (18 x 1100 litre Eurobins)
- 108.2 sqm for the internal plant/servicing facilities at ground floor level
- 140.5 sqm for the internal cycle parking facilities at ground floor level (180 cycle spaces)
- 5 external Sheffield stands to the west of the site (10 cycle spaces)
- 2 car parking areas to the west of the site, accessed via Moorfield Road provide space for 9 vehicles.
- The north and south rooftop (12th and 3rd floor level) would provide 2 separate communal amenity spaces, including play areas for children below the age of 5, for approximately 720sqm.
- Private communal amenity space of circa 499sqm is proposed along Hertford Road, in addition to policy compliant balconies for each apartment.
- The middle roof (8th floor level) will include air source heat pump plant, whilst PVs will be located on the top roof, above the lift overrun and adjacent pergola.
- Access to the building would be via two entrances, on Carterhatch Lane and Hertford Road, each set within canopies.

5.4 The detailed design of the building comprises three elements:

- A 3 storey block located to the north of the site, facing 4 to 16 Moorfield Road and 253 to 273 Hertford Road.
- An 8 storey element sitting in centre of the building, narrower than the 3 and 12 storey blocks.
- A 12 storey element located to the south of the site fronting Carterhatch Lane and Hertford Road.

5.5 The building would be clad in red brickwork with green accent details, to reflect those surrounding buildings that have been used for design cues. The ground and first floor,

and the top floors will be clad in darker brick, whilst the central floors will be a slightly lighter tone brick, adding definition to the appearance of the building. There will also be complementary muted green projecting balconies and window frames, along with light grey metal copings.

- 5.6 The site contains 23 trees in total (five of which are covered by a TPO (T1, T3, T14, T15 and T20 - as referenced in the Arboricultural Report). The proposal would require the removal of 16 trees (including one grouping), with 7 trees requiring pruning, reducing and lifting crowns, including all trees covered by a TPO.
- 5.7 It is proposed to plant 20 new trees along the western, northern and eastern boundaries of the site. Perennials, shrubs and grass comprise the soft landscaping across the site, with ornamental planting specifically located along the southern boundary (Carterhatch Lane) where a number of trees will be lost.

6. **Relevant Planning History**

Application site

- 6.1 TP/03/0128 - Demolition of existing Health Centre and construction of Primary Care Resource Centre (Outline Application). Granted with Conditions on 20.06.2003.
- 6.2 TP/94/0911 - Alterations to ground floor envisaging infilling existing open ground floor space, to provide additional health centre facilities. Granted with Conditions on 20.12.1994.

7. **Consultation**

Statutory and Non-Statutory Consultees

Highways

- 7.1 The provision of 9 car parking spaces could be a problem if there is demand for the full 10% of dwellings to have a disabled parking space. However, the London Plan requires only 3% of the dwellings with a Disabled Parking Bay (DPB) at the outset but the applicant ought to provide a parking management plan that addresses how up to 10% of dwellings can be provided with DPBs onsite if required.
- 7.2 The officer has a concern that the cycle stands are now located to the rear of the site, remote from the site entrances, whereas in the previous proposal, they were on the Hertford Road frontage next to the main entrance, in a well overlooked area accessible to visitors, which was much more appropriate and in accordance with London Cycle Design Standards (LCDS) requirements.
- 7.3 Regarding Controlled Parking Zones (CPZ), there are now more comprehensive costings for CPZs. A larger CPZ that would cover 10 streets or 1000 homes would cost £56500. The scope of the CPZ would need to be discussed. The CPZ would be essential to this scheme as without it, significantly more car parking would be required.
- 7.4 It is not appropriate to have just one of the three areas with non racked spaces. Each cycle parking area should have at least two Sheffield stands, appropriately located so that a minimum of four modified cycles can be parked in each cycle store. It should also be noted that where racked spaces are provided, they need to have a minimum

of 2m behind each racked space in order for the top row of spaces to be able to be accessed.

Flood risk

- 7.5 The design flood event that needs to be assessed is the 1 in 100 year + (17%) climate change event. The pluvial flood extent for this event covers much of the western half of the site. Based on the design flood event, the following information is still required.
- 7.6 Finished floor level (FFL) must be at least 150mm above the 1 in 100 year (plus climate change) surface water flood depth. The Flood Risk Assessment (FRA) must be updated to assess the site with the latest climate change allowances. These levels must be reflected on the plans and sections for the site.
- 7.7 The development must not reduce flood storage on site – therefore level for level flood compensation will be required where land is being raised and /or buildings are located in the areas that flood. The FRA references raising FFL but no flood compensation has been provided.
- 7.8 A Flood Management/Evacuation Plan must be provided demonstrating that the evacuation route is in the “Very Low Hazard Level” according to FD2320.
- 7.9 Flood resistant and resilient measures must be incorporated where relevant.

Drainage

- 7.10 The greenfield runoff rates calculated for the site have used the whole site area (0.295ha) whereas they should be calculated with the contributing impermeable area for the proposed development. The proposed discharge rate is therefore above the correct greenfield QBAR rate for the site.
- 7.11 Source control SuDS measures must be used extensively for the hardstanding and roof areas. It appears much of the hardstanding areas are not drained via source control SuDS measures.
- 7.12 RWPs must discharge on the surface of source control SuDS feature rather than into the sub-base, as this will cause siltation.
- 7.13 Cross sections, sizes and specifications of the proposed SuDS features must be provided.
- 7.14 Overland flow routes for exceedance events including spot levels must be included on the drainage plan or more detail.

Commercial Waste

- 7.15 The walking distance from where the bin is sited on a property and the nearest practicable position that the refuse collection vehicle can stop must not exceed 10 metres.
- 7.16 Bins must be stored on a hard surface or in a storage cupboard.
- 7.17 Footpaths between the container housing and the nearest vehicular access should be free from steps or kerbs, have a solid foundation, have a smooth solid surface, be level and have a gradient no more than 1:12 and a minimum width of 2 meters.
- 7.18 The Council is to be indemnified against any damage to road surface and under ground apparatus before bin delivery and collections if roads are not adopted.

- 7.19 Access and turning circles, length, width, height and weight of the vehicles need to be considered at the design stage. Turning circle 18.5 m to 21 m; length 9.25 m plus 1m for bin lift; width 2.53m, height 3.4m and gross weight 26 tonne.

Designing out Crime

- 7.20 The Metropolitan Police note that the intention to construct a housing development within an area that is a crime hotspot, is a concern particularly because there has not been consultation with them in regards to how safety, security and crime prevention will be designed into the build nor does the Planning statement or the DAS mention these points.
- 7.21 The Metropolitan Police Service is not able to support the development as it been presented and they have concerns that the design could contribute to and may increase the opportunity for crime and Anti-Social Behaviour at this location, putting the new and existing residents at risk, They question how lone women, vulnerable people, children & young people are being protected from high harm offences, and the lack of compartmentation assists with the free movement through the communal parts which is a key factor in domestic violence offences. They encourage the Design team to contact them so that crime preventative mitigation can be reviewed.
- 7.22 In summary they have site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations from the Plans. Site specific advice may change depending on further information or site limitations as the project develops:
- Door/window specifications
 - Access Control- type, UL 293 rated
 - Postal/Parcel Strategy
 - Landscaping- inc street furniture
 - Boundary Treatments
 - Emergency Services Egress
 - Refuse Storage
 - Bicycle Storage
 - Car Parking
 - Roof access
 - Climbing Aids/Balcony details
 - Airlock/Compartmentation
 - Lighting
 - CCTV
- 7.23 However, they advise that should the project receive planning permission they would recommend a Secured by Design condition be applied. If the Conditions are applied, we request the completion of the relevant Secured by Design application forms at the earliest opportunity.

Officer comment: The issues highlighted by the Police are matters that are covered by planning conditions as recommended above.

Public

Pre-Submission

- 7.24 Prior to submission of the revised scheme, the applicant distributed fliers on 14th July to local residents and businesses, covering an area up to approximately 160m to the west (up to the railway tracks), 220m to the east, 115m to the south. During the consultation, the consultation area was increased in the northern direction up to Crest Drive (approximately 550m) at the request of officers. The fliers include a summary of the proposal, a phone number and email address to contact for queries and feedback, and details of a website with additional information about the proposal.

Planning Application

Re-consultation letters dated 16 August 2023 were sent to 694 neighbouring and nearby properties. Notice was also displayed at the site (dated 06/10/2020) and published in the local press (dated 14/10/2020).

In response 2 representations were received which in summary, raise the following points.

Summary of responses

- Neighbourhood re-consultation failed to provide any detail of the proposed construction.
- Local schools and NHS services do not have the capacity for this development.
- The maintenance of the properties and the safety of the area is poor and the development will worsen the situation.
- More investment should be made into the existing community.
- Some residents did not receive the consultation letters and therefore were not informed of the development.
- There is an insufficient amount of parking and residents of the development will park their cars in front of the development.
- There is only one access to the estate which will cause more problems.
- Having so many more people will cause a strain on the local schools and surgeries.

Officers' response

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

8. Relevant Planning Policies

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

National Planning Policy Framework 2021

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

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

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

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

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

- 8.3 The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 8.4 In relation to achieving appropriate densities, paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.
- 8.5 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

Housing Delivery Test / Presumption in Favour of Sustainable Development:

- 8.6 The NPPF sets out at paragraph 11 a presumption in favour of sustainable development. For decision taking this means:
- "(c) approving development proposals that accord with an up-to date development plan without delay; or*
- (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:*
- I. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (7); or*
 - II. any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole."*
- 8.7 Footnote (8) referenced here advises *"This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate*

a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years."

- 8.8 In summary, the presumption in favour of sustainable development applies in two situations – where a Council is unable to demonstrate a five-year housing land supply, and when a Council fails to achieve 75 per cent or more in the Housing Delivery Test.
- 8.9 Enfield Council currently fails against both criteria – and is therefore subject to the most severe government sanctions which impact the Council’s consideration of housing-led planning applications.
- 8.10 5-year housing land supply: Members will be aware of the need to be aware of the Council’s housing land supply – and how it impacts on decision making. When there is not an up-to-date Local Plan and 5-year housing land supply cannot be demonstrated then this has a significant impact on the weight given to material planning considerations. The NPPF presumption, or ‘tilted balance’, applies in Enfield due to the Council’s inability to demonstrate the required five-year housing land supply. The Council is unable to demonstrate a 5-year supply of deliverable housing sites and this impacts on the status of its Local Plan policies.
- 8.11 Housing delivery test: The NPPF presumption, or ‘tilted balance’, also applies in Enfield because Enfield is one of 51 Councils which have achieved below 75 per cent against the Housing Delivery Tests – it is therefore also subject to the Housing Delivery Tests most severe government sanction, the NPPF’s presumption in favour of sustainable development.
- 8.12 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the Government through the NPPF. It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.13 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of "presumption in favour of sustainable development".
- 8.14 The Council's recent housing delivery has been below our housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and being placed in the "presumption in favour of sustainable development category" by the Government through its Housing Delivery Test. This status has recently been confirmed for the period 2022-23.
- 8.15 The Department for Levelling Up, Housing and Communities has not published the latest Housing Delivery Test measurement for 2022. Based on the Enfield Authority Monitoring Report 2021/22 published in February 2023, between 1st April 2019 and 31 March 2022, Enfield delivered 2,350 homes of the 3,216 required, achieving 73% of its homes target. The Council therefore remains in the “presumption in favour of sustainable development”.
- 8.16 Based on the Enfield Authority Monitoring Report 2021/22 published in February 2023, there is an estimated supply of 5,676 net new homes in the next five years. This is

equivalent to 3.80 years housing land supply when measured against the London Plan requirement and taking into account backlog need and a 20% buffer due to the failure of Housing Delivery Test.

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

The London Plan 2021

- 8.19 The London Plan together with Enfield's Local plan forms the Development Plan for this application. It is the overall strategic plan for London setting out an integrated economic, environmental, transport and social Framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:
- GG1 Building strong and inclusive communities
 - GG2 Making the best use of land
 - GG3 Creating a Healthy City
 - D1 London's form, character and capacity for growth
 - D2 Infrastructure requirements for sustainable densities
 - D3 Optimising site capacity through the design-led approach
 - D4 Delivering good design
 - D5 Inclusive design
 - D6 Housing quality and standards
 - D7 Accessible housing
 - D8 Public Realm
 - D11 Safety, Security and Resilience to Emergency
 - D12 Fire safety
 - D13 Agent of Change
 - D14 Noise
 - H1 Increasing housing supply
 - H4 Delivering Affordable Housing
 - H6 Affordable housing tenure
 - H10 Housing size mix
 - G1 Green Infrastructure
 - G5 Urban greening
 - G6 Biodiversity and access to nature
 - G7 Trees and woodlands
 - S4 Play and Informal Recreation
 - SI 1 Improving air quality
 - SI 2 Minimising greenhouse gas emissions

- SI3 Energy Infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital Connectivity Infrastructure
- SI7 Reducing Waste and Supporting the Circular Economy
- 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

Local Plan - Overview

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

Enfield Core Strategy: 2010

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

- CP 2 Housing Supply and Locations for New Homes
- CP 3 Affordable Housing
- CP 4 Housing Quality
- CP 5 Housing Types
- CP 9 Supporting Community Cohesion
- 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 32 Pollution

- CP 34 Parks, Playing Fields and Other Open Spaces
- CP 36 Biodiversity

Development Management Document (2014)

- 8.22 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.
- 8.23 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 43 Tall Buildings
 - 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 Roof Space / 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 66: Land Contamination and instability
 - 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 77: Green Chains
 - DMD 79: Ecological Enhancements
 - DMD 80: Trees on Development Sites
 - DMD 81: Landscaping

Other Material Considerations

- 8.24 The following guidance is also considered particularly relevant:
- National Planning Practice Guidance (NPPG)
 - 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)
 - The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)
 - London Councils: Air Quality and Planning Guidance (2007)
 - TfL London Cycle Design Standards (2014)
 - GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
 - GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
 - GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
 - GLA: London Sustainable Design and Construction SPG (2014)
 - GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
 - GLA: Social Infrastructure SPG (2015)
 - GLA: Housing SPG (2016)
 - GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
 - Mayor's Transport Strategy (2018)
 - GLA Threshold Approach to Affordable Housing on Public Land (2018)
 - Healthy Streets for London (2017)
 - Manual for Streets 1 & 2, Inclusive Mobility (2005)
 - Report of the Examination in Public of the London Plan (2019)
 - National Design Guide (2019)

Enfield Local Plan (Reg 18) 2021

- 8.25 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.
- 8.26 As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight, but at this stage it has relatively little weight in the decision-making process.
- 8.27 Key local emerging policies from the plan are listed below:
- Policy DM SE2 – Sustainable design and construction
 - Policy DM SE4 – Reducing energy demand
 - Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
 - Policy DM SE7 – Climate change adaptation and managing heat risk
 - Policy DM SE8 – Managing flood risk
 - Policy DM SE10 – Sustainable drainage systems
 - Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
 - Policy DM BG8 – Urban greening and biophilic principles

- Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
- Policy DM DE2 – Design process and design review panel
- Policy DM DE6 – Tall buildings
- Policy DM DE7 – Creating liveable, inclusive and quality public realm
- Policy DM DE10 Conserving and enhancing heritage assets
- Policy DM DE11 – Landscape design
- Policy DM DE13 – Housing standards and design
- Policy DM H2 – Affordable housing
- Policy DM H3 – Housing mix and type
- Policy DM T2 – Making active travel the natural choice
- Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

9. Analysis

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

- Flood Risk and Drainage
- Carbon Emissions and Sustainability
- Health
- Environmental Considerations
- Education
- Fire Safety
- Secure by Design
- Community Infrastructure Levy (CIL)
- S106 Heads of Terms
- Public Sector Equality Duty

10. Principle of Development

- 10.1 The principle of development had already been established with the original submission, where officers acknowledged that the redevelopment of the site would contribute substantially to the Council's housing delivery targets, which is welcomed and supported.
- 10.2 2 Moorfield Road is a brownfield site located in a residential area, close to amenities and abutting a major thoroughfare: Hertford Road. Optimising a brownfield site for residential site, in a suitable location, is considered appropriate.
- 10.3 The following paragraphs set out the planning policy context relevant to the principle of development.
- 10.4 The NPPF and London Plan advise that local authorities should seek to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 10.5 The Borough's current target for the plan period is for a minimum of 12,460 net housing completions between 2019/20 – 2028/29, as set out in the London Plan 2021. In the event that the proposed development was acceptable in all other respects, the proposed 100 new dwellings would make a positive contribution towards meeting the strategic housing needs of Greater London and increasing the housing stock of the Borough in accordance with the National Planning Policy Framework (NPPF) and the Policy CP5 of the Enfield Core Strategy (2010).
- 10.6 As was the case in 2022, the Council has failed the most recent Housing Delivery Test and, therefore, residential development is subject to the presumption in favour of sustainable development. The tilted balance therefore has to be applied in assessing and weighing up the benefits of the scheme and whether on balance the impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 10.7 To conclude, not only is the principle of development considered acceptable and policy compliant, but it will also contribute to alleviating the housing shortage experienced by the Council.

11. Land Use

- 11.1 The proposed change of use was addressed as part of the original submission. Officers confirmed that the proposed change of use is acceptable, as explained below.

- 11.2 Policy S1D of the London Plan indicates that *“Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.”* The proposal and the evidence submitted appears to meet the aims of making best use of land.
- 11.3 Policies (DMD17) seek to resist the loss of existing social infrastructure while DMD17 sets out the approach to protection of community facilities. Taking each part of DMD17 in turn, part (a) indicates that proposals involving the loss of community facilities will not be permitted unless *“a suitable replacement facility is provided to cater for the local community that maintains the same level of public provision and accessibility”*.
- 11.4 The former medical facility on the site was closed in 2017, and the site sold for alternative development. This followed a decision by the local NHS on the future delivery of health care facilities in the Borough and the transfer of services to Riley House. However, while it is noted that the former practice boundary is not covered in its entirety by the practice boundary of the new facility at Riley House, given the wider evidence provided by the NHS with respect to the need for consolidation of buildings, the accessibility of the alternate facility to the local community and the surgery at Brick Lane having spare capacity for c. 1,200 additional patients, it is considered this alternative methodology is acceptable to justify the loss of the existing medical facility.
- 11.5 It is accepted the new facility appears to be served by the same bus links and officers are also satisfied that disabled car parking levels are as a minimum the same as provided at the former facility. Consequently, while there is a change in accessibility, and Part A of DMD17 is not fully met, with reference to housing need and the tilted balance, it is considered this issue given the overall availability of health care services is not of sufficient concern to justify a ground for refusal.
- 11.6 Part B of DMD17 requires evidence to be submitted that demonstrates *“there is no demand for the existing use or any alternative community use”* if part A cannot be met. 3.1.1 sets out a range of alternative community facilities which could include:
- Recreation, leisure, culture and arts facilities, including theatres;
 - Libraries; adequate justification
 - 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.
- 11.7 Part G of the London Plan also indicates that *“Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2).”*
- 11.8 At the time of first submission, the applicant suggested that the marketing through ePIMS to other public sector bodies demonstrates there is no demand for alternative community uses. However, officers noted that some of the facilities listed above would not be exclusively provided by public sector landowners, (i.e. places of worship).

- 11.9 A Social Infrastructure Needs Assessment, including a letter from Allsop, was then submitted to demonstrate that the site has been considered for use as other forms of social infrastructure, which would not be suitable on this site or required in the local area. It should also be noted that the originally submitted scheme did include community space at ground floor but following negotiations as to review viability and maintain housing numbers, it was accepted that the ground floor community space could be removed from the scheme.
- 11.10 For the reasons considered above, applying weight to the fact that the health facility was relocated in 2017, and in the context of the Council's most recent Housing Delivery Test results, on balance the proposed development would be acceptable. The proposed development would therefore be acceptable when balanced against Policies DMD17 of the Development Management Document 2016 and S1 of the London Plan 2021.
12. Housing Need, Mix and Delivery
- 12.1 The current London Plan sets a target for the provision of 52,287 new homes each year. In addition, the London Plan identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the current target of 798. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable, high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.
- 12.2 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver ambitious adopted London Plan targets.
- 12.3 Policy CP5 outlines that the Council will seek a range of housing types in the intermediate sector and that the mix of intermediate housing sizes will be determined on a site by site basis. It should also be noted that the evidence base to support Core Policy 5 dates from 2008. The Local Housing Needs Assessment 2020, which informs the emerging draft Local Plan for Enfield, is a more up to date evidence base. Hence, it carries weight in the assessment.
- 12.4 The Local Housing Needs Assessment (LNHA) 2020 identifies that among those on the Council's housing register waiting list, 14.7% need one-bedroom, 35.3% need two bedroom, 42.3% need three-bedrooms, and 7.7% need four or more bedrooms.
- 12.5 The LNHA (2020) has informed emerging Policy H3 of the Draft Local Plan for Enfield (2021). Table 1 below is an extract from Policy H3, which outlines priority types for different-sized units across different tenure. The focus of affordable ownership provision (social/affordable rented) should be on two-bedrooms and 3 bedrooms units. It is noted that the Draft Reg 18 Local Plan was published in June 2021 and is at an early stage of preparation. Although this draft policy in the emerging plan carries limited weight now, it is used to illustrate the most up-to-date housing need in Enfield.

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

Table 1 - Extract from Policy H3, Table 8.4: Dwelling size priorities, Enfield Local Plan (Reg 18) 2021

- 12.6 The 2022 Committee Report confirmed that, taking into account both the housing need of the Borough together with the track record of delivery against target, it is clear that the Council must seek to optimise development on brownfield sites such as this, particularly those that are currently underused and not delivering any benefit to the wider area, such as 2 Moorfield Road.
- 12.7 The current scheme proposes 100 residential units. Compared to the previous scheme, the proposed amendments have resulted in a reduction in number of units from 106 to 100. Although this is regrettable, it has also resulted in a number of improvements that help make the proposal acceptable, on balance.
- 12.8 Table 2 below shows a comparison between the housing mix of the current and previous schemes.

Comparison of Dwelling Size Mix					
Dwelling Size	Proposed Scheme		Previous Scheme		
	Number of Units	Percentage	Number of Units	Percentage	
1B2P	42	42%	41	38%	
2B3P	2	2%	0	0%	
2B4P	38	38%	51	48%	
3B5P	18	18%	14	13%	
TOT	100	100%	106	100%	

Table 2 - Proposed and Previous Schemes, Unit Mix

- 12.9 As already explained, the offer is for 100% social rent units, which is supported by the Housing Officer and well above policy requirements.
- 12.10 Officers welcome the increase in 3 bed units from 13% to 18%. However, as was the case for the previous scheme, the proposed mix is significantly weighted towards 1 and 2 bedroom units (82%) and the number of family units (18%) falls short of the Council's preferred unit mix, as set out in Policy CP5, Policy H3 of the Draft Local Plan for Enfield and London Plan Policy H10.
- 12.11 Nonetheless, the Housing Officer has commented that whilst the demand remains for family housing, the priority is for supply across all bedroom sizes. In the case of this highly constrained site, the Officer noted that an increase in family housing will not only

reduce the footprint and quantum of units, but may impact further on social infrastructure.

- 12.12 Family units are provided at ground floor to the seventh floor, which is supported as family housing as height creates less quality accommodation for young children and occupants in the block. The majority of the 3bed+ units are provided at ground floor which allows for access to outdoor space/garden, which is also supported.
- 12.13 The provision of 38% of 2b4p, and only 2% 2b3p, is welcomed as it would provide quality accommodation for a couple with children. The space standards would be appropriate and not overcrowded at first let.
- 12.14 Taking into account the Housing Officer's comments, the housing delivery test, the presumption in favour of approving sustainable development and the balance in favour of approving schemes for residential development, it is considered the low percentage of family housing can be accepted, but only in the context of the location and the 100% social rent (equivalent to 60% market rent) affordable housing offer which would be secured through a legal agreement. The current offer of 100% affordable housing at social rent is significant and can be attributed significant weight in the assessment.

13. Affordable Housing

- 13.1 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The NPPF defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". London Plan Policy H4 sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable.
- 13.2 Enfield sets a Borough-wide affordable housing target of 40% in Core Policy 3 but acknowledges the appropriate figure will need to take into account site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.
- 13.3 DMD 1 supporting text notes that affordable housing comprises three tenures: social rent, affordable rent, and intermediate housing. Enfield's Development Management Document Policy DMD 1 (Affordable Housing) states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need.
- 13.4 The proposal includes 100 residential units, 100% affordable housing with all the units available at social rent in excess of policy requirements.
- 13.5 Due to the 100% affordable offer, Policy H5 (Threshold approach to applications) identifies this as a fast track application. Fast tracked applications are not required to provide a viability assessment at application stage.
- 13.6 A qualifying criterion does require the local planning authority to be satisfied regarding the tenure mix with Policy H5 stating: "*Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the Borough or the Mayor where relevant*".
- 13.7 Policy H6 of the London Plan (Affordable Housing Tenures) advises that the following split of affordable products should be applied to residential development: a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent,

allocated according to need and for Londoners on low incomes a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership the remaining 40 per cent to be determined by the Borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

- 13.8 The 2017 SHMA shows London's significant need for low-cost rental housing which is reflected in priorities for our own Borough. There is therefore presumption that the 40 per cent to be decided by the Borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.
- 13.9 In this instance, the tenure mix of 100% social rent is acceptable. The London Plan is committed to delivering genuinely affordable housing and within the broad definition of affordable housing, the Mayor's preferred affordable housing tenures includes London Affordable Rent.
- 13.10 LAR is for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. Rents are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF.
- 13.11 The proposal provides social rent with an equivalent to 60% of market rent (i.e discount of 40%).

14. Character and Design

- 14.1 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*". London Plan Policy D3 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*".
- 14.2 Policy CP30 of the Core Strategy requires new development to be of a high-quality design and in keeping with the character of the surrounding area. This is echoed in Policy DMD8 which seeks to ensure that development is high quality, sustainable and has regard for and enhances local character.

Character and Townscape

- 14.3 The application site is rectangular in shape and located to the north of the Enfield Highway Local Centre. It is evident there is a variety of buildings in age, design and materiality within the vicinity of the site. It is bounded by Carterhatch Lane, Hertford Road and Moorfield Road. The site is located on a prominent corner of a busy junction. The trees around the perimeter largely obscure views into the site. The site itself is covered by a large rectangular two storey building and single storey ancillary structure. Although large, it has a relatively low-key appearance within the townscape. The site

also has specific constraints, most notably in terms of its narrow shape and tree Root Protection Areas. This site-specific constraint has influenced the form of the development, from inception through the design changes that led to the current proposal.

- 14.4 The Enfield Characterisation Study identifies that the buildings in linear centres also lack the cohesiveness of the more mannered 'Metroland centres'. Enfield Highway Local Centre has elements which were built as part of interwar redevelopment. It is evident the centre features a variety of building types and periods. This gives considerable variety in scale, materials and details, within proximity to the application site. The Study notes that there are some areas of modern development around Enfield Highway Local Centre, including clusters of towers at Eastfield Road and the western end of Ordnance Road. Therefore, taller buildings are an architectural feature already present in this character area, albeit in the form of 1980s blocks with little design merit.
- 14.5 The existing buildings on the site are considered post war and of little architectural merit. These buildings are not designated heritage assets (neither being listed). There is no objection to their demolition and replacement, subject to appropriate design.
- 14.6 The proposal would involve the redevelopment of the site and the construction of a building comprising 3 elements, that would be 3, 8 and 12 storeys high (including ground floor). The staggered approach will add interest to the appearance of the new building and is considered an improvement on the previous proposal, a monolithic 9 storey block.
- 14.7 By breaking down the mass and appearance of the building, the relationship between neighbouring properties has been improved. The 3 and 8 storey elements are more appropriate in the local context than the previous 9 storey block, and will make a positive contribution to the local townscape. Their height complements that of neighbouring buildings on Moorfield Road and Hertford Road without appearing overbearing, thanks to a series of set-backs which ensure sufficient distance from all sides.
- 14.8 The smaller, 3 storey element has been located to the north of the site, facing 4 to 16 Moorfield Road and 253 to 273 Hertford Road, who are some of the most sensitive neighbours in terms of potential daylight, sunlight and overshadowing impact.
- 14.9 The 8 storey block sits in centre of the building and is narrower than the 3 and 12 storey blocks. The same approach to setting back the central part of the building was adopted in the previous scheme; the proposed lower height protects the residential amenity of 1 to 43 Moorfield Road.
- 14.10 The 3 and 8 storey elements are considered appropriate in the local context and are supported. The proposed design is high quality and will make a positive contribution to a local townscape, already characterised by a variety of scales, materials and details.
- 14.11 The section of the proposed building fronting Carterhatch Lane will be 12 storeys high. A comparison between the current and previously proposed elevations show that 2 to 4 storeys (depending on the elevation viewpoint) have been added on Carterhatch Lane, in order to redistribute the massing of the building and ensure that the number of units is not significantly reduced.
- 14.12 The visualisations provided within the Design and Access Statement (DAS) show that the proposed 12 storey element, when viewed in the wider context, appears to complement the height of Hastings House without appearing overly tall. Closer views

show that this element will inevitably be perceived as prominent in the local context, especially since this is a corner location. However, the constraints of the site don't allow for a larger set back from Carterhatch Lane, without negatively affecting the scheme.

- 14.13 The proposed 12 storey element will therefore change the local townscape character. This is addressed in the following paragraphs, which analyse the implications of the proposed siting of the building; of an alternative footprint; and delivering a taller element in the local context.

Proposed siting of the building

- 14.14 The siting of the building has been subject to extensive discussion with officers prior to the submission of this revised scheme.
- 14.15 As was the case of the previous proposal, the siting of the building has been adjusted to facilitate continuation of a green buffer along roads to minimise the impact on the existing trees. As a result, the building does not align with the existing street pattern and sits at an angle compared to the buildings along Hertford Road.
- 14.16 The DAS shows a comparison between the siting of the previously proposed building and the current scheme, showing how the proposed footprint has been shifted in a south-west direction.
- 14.17 Whilst the 50cm shift of the south-east corner and western building line is a negligible distance, the proposed 2.28m shift along the eastern boundary is welcomed, as it increases the distance between the proposed building and 253 to 273 Hertford Road, sensitive neighbours in terms of potential daylight, sunlight and overshadowing impact. This also allows the building to avoid impacting on the Hertford Road Root Protection Areas (RPAs) and tree crowns.
- 14.18 The central element of the proposal is narrower than the other two blocks. The same approach to setting back the central part of the building was adopted previously, however, the proposed lower height now protects the residential amenity of 1 to 43 Moorfield Road.
- 14.19 The proposed building will be located 2.1m to 3.2m from the red line boundary to the south, and 4.78m to 6m from the kerb. This relationship is not unusual in the locality and would have possibly raised no concerns on a different site. It is acknowledged that Carterhatch Lane is wider than Hertford Road, which offers a small degree of visual mitigation in the local townscape. However, this is a prominent corner site and a further set back from Carterhatch Lane would have been preferable, as it could have softened the impact of the proposed building on the townscape.
- 14.20 Officers discussed this at length with the applicant's team. Prior to re-submission, a plan (ref. SK230602 Footprint Study) was produced which demonstrates that it would not be possible to achieve a smaller footprint without a significant reduction in housing numbers, with a higher percentage of small units. The plan also shows that it would not be possible to deliver 2 bed units (4 people) that comply with the Nationally Described Space Standards, or to deliver M4(3) compliant units.
- 14.21 To conclude, taking into account the benefits resulting from the proposed footprint alterations and the tilted balance in favour of approving schemes for residential development, it is considered that the proposed building footprint is acceptable and in line with Policies CP30 and DMD8, but only in the context of the location and the 100% social rent affordable housing offer which would be secured through a legal agreement.

Considerations on Height and Tall Buildings

- 14.22 The proposed building includes:
- A tall element: 12 storeys. This measures 41.90m at the lift overrun, and 39.50 at the parapet.
 - A lower element, still taller than the average in the local area: 8 storeys. This measures 28.40 at the plant enclosure, and 26.30 at the parapet.
 - A low element: 3 storeys. This measures 12.15 at the plant enclosure, and 10.60 at the parapet.
- 14.23 The proposed 12 storey element is clearly a tall building within the context of adopted policy and would represent a significant addition to the built environment. The 8 storey element falls short of the definition of tall buildings, but still needs careful consideration.
- 14.24 The NPPF at Para 119 states that *“Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”*. Para 124 of the NPPF also states that *planning decisions should support development that makes efficient use of land, taking into account:*
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) local market conditions and viability;*
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) the importance of securing well-designed, attractive and healthy places.”*
- 14.25 The London Plan advises that while high density does not need to imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing necessary future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. It is also considered that tall buildings that are of exemplary architectural quality and in the right place, can make a positive contribution to London’s cityscape. Many tall buildings have become a valued part of London’s identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design.
- 14.26 London Plan Policy D9 states that Boroughs should determine through their local plan if there are locations where tall buildings may be appropriate and proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Tall buildings should only be developed in locations that are identified as suitable in Development Plans. The current development plan for the Borough does not identify suitable locations for tall buildings pursuant to the requirements of London Plan Policy D9. It can be noted that the Council’s draft Reg18 local plan does not identify this land as an appropriate location for tall buildings.
- 14.27 Policy DMD 43 classifies a tall building as over 30m as does the London Plan. The proposed development would rise up to 12 storeys with a maximum height of 41.90m

(lift overrun). 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 unless it can be demonstrated how the proposal avoids the negative impacts associated with the sensitive classification.

- 14.28 Paragraph 130 of the NPPF states that *“Planning policies and decisions should ensure that developments are, 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”*.
- 14.29 Both the London Plan and DMD tall building policies are relevant to the proposed development. As was the case for the previous scheme, the policies can be distilled into two questions:
- a) is the proposal in the right location?
 - b) is it of high quality?
- 14.30 These questions are addressed in the following paragraphs.
- 14.31 Acceptability of a taller building in a particular location will be dependent on the detailed local context, including the design of the building, the relationship to neighbouring properties, the relationship with any heritage assets and the impact on any views including those to and from historic buildings over a wide area. This requires careful consideration that should be given to the potential negative impact introducing 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.
- 14.32 Importantly, recent case law indicates that, notwithstanding the plan led approach of London Plan Policy D9, the land does not have had to be identified as appropriate for tall buildings, as long as it is appropriate for its location in terms of its design.
- 14.33 The previous Committee Report noted that the site is not located in a town centre but on the edge of a local centre, and has reasonable public transport accessibility. The Urban Design Officer raised concerns previously as to whether this location for a tall building is appropriate, questioning the justification on the basis of townscape legibility and its role as a focal point for development at this junction. In this regard, the balance is whether the benefits of the proposal in terms of housing delivery and provision of affordable housing, outweigh the visual concerns associated with the 12 storey height of the development as proposed, and whether this would have a negative impact on the legibility of the locality, when experienced as part of the Borough’s existing townscape.
- 14.34 The predominant height in the locality is 4 storeys. The 2012 Report on Tall Buildings (which forms the evidence base for DMD policy) assesses Hastings House as *“Inappropriate Location, Inappropriate Building”* (No. 30 Existing Tall building assessment map, pp 11.). However, Hastings House clearly forms part of the visual context for development when viewed from both Hereford Road and Carterhouse Lane.

- 14.35 It should be noted that since 2012, Hertford Road has become increasingly urbanised, public transport links have improved, and the Enfield Highway Local Centre increased the shops and services. Therefore, this is an appropriate location for a taller residential building, in the context of the pressing local housing need.
- 14.36 The 2022 Committee Report concluded that the resultant bulk and massing of the development, particularly to the northern end, resulted in unacceptable impacts to the residential amenities of neighbouring properties.
- 14.37 By reconfiguring the design into three elements of varying heights, the applicant has addressed concerns raised previously. The staggered building heights represent an important improvement in both the impact on the local townscape and residential amenity. The proposed shift of the building footprint to the south-west also improves the impact on neighbouring residential amenity.
- 14.38 Specifically, the bulk and massing to the northern end has been significantly reduced, from 9 to 3 storeys. This element is representative of the height and scale of local buildings, with no detrimental impact on the residential amenity of 4 to 16 Moorfield Road and 253 to 273 Hertford Road.
- 14.39 Officers would prefer a slightly lower height building, with a greater set back from Carterhatch Lane, which would have lessened the impact on local views and on pedestrians' visual experience. The applicant has submitted information to demonstrate this would result in a series of drawbacks, including and a reduction in number of units and non-policy compliant floorplans. Given the local housing need, the tilted balance and the requirement to deliver high standard homes, an alternative proposal would not be desirable.
- 14.40 The Wind Microclimate Report confirms that wind conditions within the surrounding areas at ground level are expected to remain suitable for at least leisurely strolling along thoroughfares and for short periods of standing at entrances, conditions therefore remain suitable for existing and proposed pedestrian users.
- 14.41 To conclude, whilst London Plan Policy D9 and Policies DMD 43 and 8 are noted, on balance the proposed improvements to the scheme, the tilted balance in favour of approving schemes for residential development, it is considered that the proposed height is acceptable, in the context of the location and the 100% social rent affordable housing offer (which would be secured through a legal agreement.)
- 14.42 Overall, the 100% affordable housing at London Affordable Rent is attributed significant weight in the assessment.

Detailing and materials

- 14.43 Amendments to the colour and details of the scheme have been sought, with the brickwork cladding changed to a darker terracotta colour, with green accent details, referencing the local buildings of the highest architectural quality, such as the Enfield Highway Carnegie Library and Southbury Overground Station. A similar brick colour can also be found along the Hertford Road Local Centre.
- 14.44 The ground and first floors; the top floors of the south and central blocks will be clad in darker brick. The central floors will be clad in a lighter brick, adding definition to the appearance of the building. This will be complemented by muted green projecting balconies and window frames, along with light grey metal copings.

- 14.45 The quality of brickwork, balcony detailing windows and surrounding lintels appears to be of a high quality and appropriate in the surrounding context. Officers support the proposed material palette, in line with Policies DMD8, DMD 37 and CP30. A condition has been attached that requires materiality details to be submitted to the Council for approval.
- 14.46 The previous scheme proposed 2no. main entrances, both fronting onto Hertford Road. The revised scheme proposes one on Carterhatch Lane and one on Hertford Road, activating both frontages of the site and promoting pedestrian activity. This is supported and is a welcome improvement.
- 14.47 The Carterhatch Lane entrance has been revised to include a protruding canopy; lighter brick at ground and first floors, with distinctive paving and signage to provide visible legibility to pedestrians.
- 14.48 The Hertford Road entrance is more modest in size and detailing, replicating the architectural style of this elevation. This is an appropriate approach for a secondary entrance.
- 14.49 The Wind Microclimate Report advises that the two entrances to the site are recessed and sheltered from prevailing winds channelling along Hertford Road and Carterhatch Lane. As such, these entrances are expected to be suitable for standing and thus for comfortable pedestrian ingress / egress. The proposed entrances are considered to comply with Policies DMD8, DMD 37 and CP30.
- 14.50 The proposed route between the lobbies is well designed. The building adopts a 2-core approach which is welcomed. It allows for a lower number of homes per floor / core, and a greater sense of security and ownership, and contributes to fire safety.

Conclusion of Character and Design

- 14.51 The character and design of the proposal have been subject to extensive discussion with officers, given that the previous proposal was considered to represent an overdevelopment of the site, which led to reason for refusal no. 2.
- 14.52 The proposed building, with its staggered approach, is of higher design quality and, on balance, does not unduly harm the townscape character of the locality sufficient to outweigh the benefits of the proposal. The current offer of 100% affordable housing at London Affordable Rent is significant and is attributed considerable weight in the assessment. Reason for refusal no.2 is considered successfully addressed.

15. Neighbouring Residential Amenity

BRE Guidance - Daylight and Sunlight

- 15.1 London Plan Policy D6 notes 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. 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 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.

- 15.2 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.
- 15.3 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...”*.

BRE Guidance - Daylight and Sunlight to Existing Surrounding Buildings

- 15.4 The BRE Guidelines stipulate that... *“the diffuse daylighting of the existing building may be adversely affected if either: the VSC [Vertical Sky Component] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value”*. (No Sky Line / Daylight Distribution).
- 15.5 At paragraph 2.2.7 of the BRE Guidelines it states: *“If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the development in place is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time”*.
- 15.6 The ‘Comparative Impacts and Overshadowing to Neighbouring Assessment’ has suggested that a reduced measure of VSC, as opposed to 27%, should be used when considering this scheme, citing two recent appeal decisions. Officers agree that VSC results in the mid-high teens and low twenties are frequently considered to be acceptable in an urban context with neighbouring buildings in close proximity.
- 15.7 Officers also agree, in principle, that the site is uncharacteristically underdeveloped for this urban location, and that the VSC method would tend to over-emphasise the scale of changes. Nonetheless, the impact of the proposed development should not be detrimental to the amenity of existing residents.
- 15.8 In making assessments, a judgement is made as to the level of impact on affected windows. Where there is a less than 20% change in VSC the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages do not form part of the BRE Guide and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable, depending on a number of circumstances.
- 15.9 The Comparative Impacts and Overshadowing to Neighbouring Assessment confirms that all windows that are flush with facades in the surrounding buildings achieve values within this range (late teen/ early twenty). Where VSC values are dropped below these levels, they are all located within overhanging walkways (50-56 Carterhatch Lane and

23-43 Moorfield Road), next to projecting wings and/or under balconies (Narev Court). These windows already have VSC values around or below 10% because of their location within the building.

- 15.10 The BRE acknowledges that existing windows with balconies above them typically receive less daylight, as a balcony and/or overhang cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. The Assessment concludes that in these instances, it is the overhang, rather than the proposed scheme, that is resulting in low VSC values. Officers agree with this statement.
- 15.11 The Assessment and the additional 'Moorfield Road daylight, sunlight and the level of VSC change for neighbouring buildings' note submitted during the pre-submission discussion, confirm that 14 windows (8%) will experience a change of 40% or more, considered as 'major adverse, and 12 windows (7%) will experience a change of 30 to 40%, considered as 'moderate adverse'. However, a number of these windows are located beneath an access deck, whilst the remaining windows serve dual aspect rooms, or bedrooms and kitchens where it is acknowledged that daylight is of less importance.
- 15.12 Even when the VSC change will be beyond 30%, the rooms will retain VSC levels of late teen/ early twenty as a minimum.
- 15.13 To conclude, it is considered that the impact of the proposal on the daylighting of the existing buildings is acceptable taking into account the following circumstances:
- The urban nature of the location.
 - The uncharacteristically underdeveloped nature of the application site.
 - The degree of flexibility afforded by BRE Guidance when assessing windows with balconies or under overhangs.
 - The tilted balance in favour of approving schemes for residential development.
- 15.14 With regards to sunlight, the proposed scheme will result in full BRE compliance and thus the sunlight to adjoining properties will not be adversely affected by the construction of the Proposed Scheme.
- 15.15 Loss of sunlight and daylight and unneighbourly sense of enclosure, as perceived from neighbouring properties, was part of the reason for refusal no.1. Therefore, the current proposal is a significant improvement on the previous scheme from a daylight and sunlight perspective.

BRE Guidance – Overshadowing to Existing Surrounding Buildings

- 15.16 BRE guidance recommends that for it to appear adequately sunlit throughout the year, at least half (50%) of a garden or amenity area should receive at least two hours of sunlight on 21 March. If, as a result of new development, an existing garden or amenity area does not meet the above and the area which can receive 2 hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.
- 15.17 All gardens at 4-16 Moorfield Road will achieve BRE compliance for overshadowing. This is a significant improvement on the former scheme, where the gardens of nos.8, 10 and 12 would have seen losses of 100% of their former value.

Overlooking / Loss of Privacy / Overbearing

- 15.18 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.
- 15.19 Adopted Enfield Policies DMD 6 and 8 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. Adopted Enfield 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. Adopted Enfield Policy DMD10 is silent on this type of relationship, but requiring that development not compromise adjoining sites.
- 15.20 This new proposal has been designed to minimise issues of overlooking and loss of privacy, which, to certain extent, are typical of an urban environment. Thanks to the staggering approach and the proposed set backs, the relationship between the proposed building and neighbouring properties has improved.

Noise and Disturbance

- 15.21 Guidance relevant for the assessment of noise affecting new developments is given in the National Planning Policy Framework (NPPF). Paragraph 185 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 a) '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'.
- 15.22 Meanwhile Policy D14 of the London Plan 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...'. Lastly, the London Plan introduces the concept of 'Agent of Change' which places the onus on the new development to ensure adequate noise mitigation measures are in place if their development will be close to a noise generating use.
- 15.23 The proposed residential development is consistent with the existing prevailing residential use in the area, and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the residential element of the development.

Conclusion on Neighbouring Residential Amenities

- 15.24 The relationship between the proposed building and neighbouring properties, in terms of daylight and sunlight, overlooking and privacy has significantly improved, compared to the 2022 scheme.

15.25 Some level of overlooking remains, but this is considered inevitable in an urban location, and especially since the previous NHS building was of a small scale.

15.26 Taking into account the high quality design that makes a positive contribution to the area, the improvements compared to the 2022 proposal, and the tilted balance in favour of approving schemes for residential development, it is considered that the proposal’s impact on the neighbouring residential amenity is acceptable.

16. Quality of Accommodation

Compliance with Nationally Described Space Standards

16.1 The NPPF (Section 12) identifies good design as a key aspect of sustainable development, stating that “*the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*”.

16.2 Policy D6 of the London Plan sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space.

16.3 The Policy notes that design must not be detrimental to the amenity of surrounding housing. Table 3.1 sets out the internal minimum space standards for new developments and Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments. 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).

16.4 The table below illustrates the compliance of the proposed units with national floorspace standards.

Unit Size	Floorspace provision range	Minimum expected	Accordance with criteria
1B2P	51.1 to 62.3	50sqm	Y
2B3P	69.2	61sqm	Y
2B4P	70.2 to 74.1	70sqm	Y
3B5P	88.1 to 92.6	86sqm	Y

Table 3 – Compliance with national floorspace standards.

16.5 The plans submitted confirm that the proposed units will also comply with national floorspace in terms of bedroom and storage size, and floor to ceiling height.

Dual Aspect

16.6 Dual aspect accommodation in the interests of outlook and ventilation should be sought for all accommodation as a minimum, and this scheme fails to provide it in this instance, as was the case for the 2022 proposal. Instead, the scheme utilises the same approach as the previous proposal, by providing ‘enhanced’ single aspect accommodation by virtue of large windows and balconies.

- 16.7 The level of dual aspect accommodation is 64%, a slight improvement on the previous 62.2%, which is welcomed. There is no minimum number specified in London Plan Policy D6, which requires the provision of dual aspect homes to be maximised in developments. Although it would be desirable to have a higher number of dual aspect accommodation, this would result in fewer units, due to the constraints of the site. Therefore, given the tilted balance that applies, it is considered the scheme is acceptable and no grounds to refuse planning permission could be sustained on this point alone.
- 16.8 The table below shows the analysis of dual aspect through the scheme.

Floor	Dual Aspect	Single Aspect	Total
GF	4 (57%)	3 (43%)	7
1F	7 (50%)	7 (50%)	14
2F	7 (50%)	7 (50%)	14
3F	6 (67%)	3 (33%)	9
4F	6 (67%)	3 (33%)	9
5F	6 (67%)	3 (33%)	9
6F	6 (67%)	3 (33%)	9
7F	6 (67%)	3 (33%)	9
8F	4 (80%)	1 (20)	5
9F	4 (80%)	1 (20)	5
10F	4 (80%)	1 (20)	5
11F	4 (80%)	1 (20)	5
Total	64 (64%)	36 (36%)	100

Table 4 - Dual aspect analysis.

Accessibility

- 16.9 Policies D5 and D7 of the London Plan 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. Policy D7 of the London Plan sets out that in order to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:
- 1) 1. At least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings',
 - 2) 2. all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.'
- 16.10 Local Plan DMD Policy 8 has similar policy objectives.
- 16.11 The proposal includes 12% Wheelchair Adaptable units of which 10% are Wheelchair Accessible part M4(3) compliant. All other units will 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. A condition will be attached that requires the proposed development to comply with the above outlined standards.

Private amenity space

- 16.12 Local Plan Policy DMD 9 outlines minimum private outdoor amenity space provision standards. London Plan Policy D6 states that, where there are no higher local standards, a minimum of 5sqm should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. The London Plan Housing SPG indicates that where it is not possible to provide private outdoor amenity, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement.
- 16.13 The proposal includes policy compliant balconies for all the upper floors, and policy compliant ground floor amenity spaces.
- 16.14 Previously concern was expressed about the lack of defensible space and possible requirement for privacy screens (1.8m) and obscure glazing. The revised scheme has increased the provision of soft landscaping, includes higher quality ground floor private amenity (to include paved and green areas) and defensible space around the residential units, which is welcomed.

Communal Amenity Space and Play Area

- 16.15 The applicant is proposing to deliver approximately 499sqm communal amenity space on ground level, fronting Hereford Road. This is an improvement on the 364sqm previously proposed, which is welcomed and supported by officers.
- 16.16 The Wind Microclimate Report confirms that wind conditions at all thoroughfares within the site are expected to be suitable for at least leisurely strolling throughout the year and thus for comfortable pedestrian access to and passage through the site.
- 16.17 Policy S4 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child. Core Policy 34 and Policy DMD 73 state that development with an estimated child occupancy of ten children or more will be required to incorporate on-site play provision to meet the needs arising from the development.
- 16.18 To meet policy requirements play space on the two green roofs (3rd and 12th storeys) that will be aimed at ages 0-4, with adjacent seating space for carers, is included. The roof terraces will have around 720sqm of playable area that will be designed on the theme of sensory play. Older children will also be able to use the space informally.
- 16.19 This supplements the existing play space to the north-west of Moorfield Road, to the north-west of Lambard Avenue, to the north of St George's Field and to the southern side of Carterhatch Lane. These four sites offer play space to a range of age groups and are all within a 10 minute walk from the site. The GLA population yield calculator indicates that 34 children below the age of 5 will live at the development. the proposed play area comfortably exceeds policy requirements.
- 16.20 TA Wind Microclimate Report accompanies this submission, which confirms that the presence of the 1.1m tall and 1.6m tall parapets around the terraces would be expected to result in comfortable wind conditions for short-term sitting or better throughout the terraces from spring to autumn; conditions are thus expected to be suitable for proposed recreational use.

- 16.21 The wind conditions at the balconies throughout the proposed development are expected to be suitable for at least short periods of sitting in summer and thus for the intended use.
- 16.22 Whilst officers would have preferred suitability for sitting for longer periods of time in all seasons, the constraints of the site are such that larger balconies would appear inappropriate, and there is no alternative location for play space. In light of these considerations and the tilted balance which currently applies, it is considered that this element of the proposal is appropriate. Details of hard and soft landscaping will need to be submitted for approval in writing.

Internal Daylight and Sunlight

- 16.23 The Internal Daylight, Sunlight and Overshadowing Report shows that 226 (82%) of the 276 rooms assessed will achieve the minimum levels of spatial Daylight Autonomy (sDA) recommended within the UK National Annex for residential buildings. The Report comments that compliance would reach 91%, should the 150 lux recommended for living rooms be considered acceptable, instead of a higher level for combined Living/Kitchen/Dining rooms.
- 16.24 Officers consider that, taking into account the housing delivery test, the presumption in favour of approving sustainable development and the tilted balance in favour of approving schemes for residential development, it is acceptable to use the lower lux level suggested in the Report.
- 16.25 The rooms that experience lower levels of light are either located on the lower floors and provided with balconies, have good access to sunlight, or fall short only marginally of the daylight levels suggested for living rooms or bedrooms. Therefore, the proposed internal level of daylight and sunlight is considered acceptable.
- 16.26 Officers also note that 99% of the windows that qualify for sunlight assessment will meet BRE Guidance. The only unit falling short of guidance does so only marginally and, owing to its north-west orientation, has a naturally lower expectation for direct sunlight in mid-season.

Overshadowing: Public and Communal Amenity Areas (Sunlight on the Ground)

- 16.27 An overshadowing assessment has demonstrated that the communal area will meet BRE Guidance.

Outlook

- 16.28 The 2022 Committee Report expressed concern about the outlook afforded to a number of flats facing onto trees, as this relationship would not be beneficial for functioning residential accommodation and would place future pressure on the trees' retention. The flats that were most affected by this relationship were the ones facing the eastern boundary of the site.
- 16.29 There is a 2.28m shift in the building footprint to the south-west direction, thus these apartments will enjoy a larger gap with the existing trees to be retained along Hertford Road. This is welcomed by officers.

- 16.30 Although a larger distance between the building and the retained trees would have been preferable, Officers acknowledge that this cannot be delivered without significantly affecting the design and the delivery of affordable homes.
- 16.31 With regards to future pressure on the trees' retention, this could be addressed as part of the Landscape Management Plan, to be secured via condition. The Plan will need to ensure, among other points, that the trees are pruned at appropriate intervals (see Tree section in this Report) and the ground floor communal area is cleaned regularly.
- 16.32 Given the above considerations and the tilted balance that applies, it is considered the outlook for prospective residents is acceptable and no grounds to refuse planning permission could be sustained on this point alone. This positively addresses reason for refusal 2.

Noise

- 16.33 With regards to noise impact to future occupiers of the Development, the 2022 submission documents include an Environmental Noise Assessment. This is also relevant to this scheme, and it recommends mitigation measures are implemented to address ground borne noise and vibration impact, including suitable glazing. In order for noise and vibration levels to remain at an acceptable level, a planning condition has been recommended to secure this, in line with relevant policy and guidance as outlined above.
- 16.34 With regards 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. However, it is reasonable to assume that future occupiers would prefer the option to have a noisier balcony as opposed to having no balcony at all.
- 16.35 Furthermore, it is acknowledged that there are no other noise mitigation measures available for balconies other than fully enclosing them (i.e. 'winter gardens'), which essentially changes the balconies into internal rooms. On this basis the development is considered acceptable in relation to noise levels in external to private amenity areas.

Air Quality / Pollution

- 16.36 This submission is accompanied by an updated Air Quality Assessment, which demonstrates that the proposed development is suitable for this site, and that the scheme has been assessed as air quality neutral. The mitigation measures detailed within the report have been conditioned, to ensure that impacts to sensitive receptors are minimised during the construction stage.

Conclusion on Quality of Accommodation

- 16.37 The proposed quality of accommodation has significantly improved, compared to the 2022 scheme. Whilst both buildings would comply with Nationally Described Space Standards, the current proposal benefits from improved private and communal amenity provision, defensible space and outlook. Daylight and sunlight levels and overshadowing have been tested, and are considered acceptable.
- 16.38 Taking into account the improvements compared to the 2022 proposal, and the tilted balance in favour of approving schemes for residential development, it is considered that the proposal's quality of accommodation is acceptable.

17. Trees and Landscaping

- 17.1 Policy DMD 80 requires the retention and protection of trees of amenity and biodiversity value on a site and in adjacent sites that may be affected by proposals. Policy DMD 81 ensures development must provide high quality landscaping that enhances the local environment.
- 17.2 The site contains 23 trees in total (five of which are covered by a TPO (T1, T3, T14, T15 and T20 - as referenced in the Arboriculture Report), with prominent trees along both Carterhatch Lane and Hertford Road. The proposal would require the removal of 16 trees (2no. Category B trees, 11no. Category C trees, 1no. Category C tree group and 2no. Category U trees), with 7 trees requiring pruning, reducing and lifting crowns of trees including all trees covered by a TPO.
- 17.3 It is proposed to fell two Category B trees fronting Carterhatch Lane, T8 and T12. As part of the discussion for the previous scheme, the applicant was advised that the felling of these two trees was cause of concern, due to the visual impact upon the local street scene. However, the applicant's team has now been able to demonstrate that, although their loss is regrettable, a scheme that retains the Category B trees would not be desirable.
- 17.4 The updated Arboricultural Impact Assessment confirms that the proposed amendments to the footprint of the building will ensure that the impact of pruning required has now lessened. The root protection areas of the retained trees will be protected, thanks to the erection of protective fencing and the creation of a Construction Exclusion Zone. 'No-dig' construction methods will also be utilised and, where necessary, arboricultural supervision will be employed when construction activities may impact on trees and their root protection areas.
- 17.5 20 new trees are proposed, along the western, northern and eastern boundaries of the site. The trees chosen include flowering and fruiting varieties which will benefit local biodiversity.
- 17.6 As the impact on trees was considered unacceptable in the previous scheme, leading to reason for refusal no. 4, the Arboricultural Officer has liaised closely with the applicant's team to ensure that the proposed felling, replacement trees, and impact of the proposed works on the retained trees is acceptable.
- 17.7 The Arboricultural Officer confirmed the proposed footprint of the building will protect the retained trees (including 5 TPOs) and that the replacement provision is satisfactory, subject to conditions. This addresses reason for refusal no.4 of the previous scheme.
- 17.8 With regards to landscaping, a revised strategy has been submitted, which is an improvement. More soft landscaping is now proposed, and the proposed Planting Strategy shows a variety of species that will deliver a high quality environment for future residents.
- 17.9 Perennials, shrubs and grass comprise the soft landscaping across the site, with ornamental planting specifically located along the southern boundary (Carterhatch Lane) where a number of trees will be lost.
- 17.10 A Landscape Management Plan will be secured via condition. The Plan will need to ensure, among other points, that the trees are pruned at appropriate intervals and the ground floor communal area is cleaned regularly.

18. Biodiversity

- 18.1 The London Plan, the Core Strategy, and the DMD seek to protect and enhance biodiversity. Policy DMD 79 states that developments resulting in the creation of 100m² or more, or the creation of one or more net dwellings should provide on-site ecological enhancements and Policy DMD 81 states that development must provide high quality landscaping that enhances the local environment. Most developments can provide ecological enhancements to improve the biodiversity offer on that site. Enhancements could range from anything such as bird boxes to wildlife friendly landscaping or green roofs, but enhancements should be scaled to reflect the size and scale of the proposed development.
- 18.2 Policy DMD 55 requires all major developments to use as much roof space and vertical surfaces as technically and economically feasible for the installation of zero carbon technologies, green roofs, and living walls. Such measures will also contribute to flood risk management. Any proposal should also demonstrate how it conforms to the Drainage Strategy.
- 18.3 This submission is accompanied by an updated Preliminary Ecological Appraisal and Bat Survey, which confirms that the site is not subject to any statutory or non-statutory nature conservation designations. No impacts are envisaged on statutory or non-statutory designated sites due to the scale of the proposed works.
- 18.4 Furthermore, no evidence of roosting bats was recorded within any of the buildings on site during the inspections or emergence survey. The report concludes that the proposals are unlikely to impact the low numbers of foraging bats using the site, provided sensitive artificial lighting is employed during the construction and operational phase of development.
- 18.5 The DAS explains that the scheme has been designed to make use of the existing mature trees and will incorporate opportunities for habitat creation, with bird and bat boxes as well as the introduction of bug hotels and log piles. There is a diagram showing the locations of new biodiversity clusters across the site, and further details will be secured via condition.
- 18.6 The Proposed Development will not result in the disturbance of any existing habitats biodiversity gain.

19. Access, Traffic and Parking

Trip Generation

- 19.1 A Transport Addendum has been submitted, which confirms that the movements generated by the proposed development would be slightly lower than those generated by the 2022 proposal. Overall, the anticipated trip generation is not considered to be significant and would not have a material impact on the operation of the surrounding highway network or public transport loading.

Car and Cycle Parking

- 19.2 London Plan Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of

connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.

- 19.3 London Plan 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.
- 19.4 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.
- 19.5 The site is located on the corner of Carterhatch Lane and Hertford Road, and was previously in use as a medical centre, but this has since closed. Vehicular access is currently and is proposed to remain from Moorfield Road, which is an adopted unclassified road accessed from Carterhatch Lane. This was also the case for the previous proposal.
- 19.6 Hertford Road and Carterhatch Lane are both classified roads with double yellow lines preventing parking at any time, and there is a zebra crossing to the immediate south of the site on Carterhatch Lane.
- 19.7 The site has a PTAL of 2, which is low. There are double yellow lines along much of Moorfield Road at the London Fire Brigade request, as there was already an issue with parked vehicles blocking access. This has further reduced the available on-street space for any off-site parking or servicing.
- 19.8 The Transport Addendum and Car Park Management Plan that support the scheme confirm the provision of 9 car parking spaces, which include:
 - 3 disabled bays.
 - 1 car club bay.
 - 2 electric vehicle charging bays (the other 8 would have passive electric charging capabilities).
 - 3 standard parking bays.
- 19.9 The 9 car parking spaces would mean that this development would be considered as 'car free'.
- 19.10 Given the low PTAL of this site, a car-free development would only be suitable in this location if a Car Parking Zone (CPZ) was implemented, and occupants of the new development are exempted from being eligible for residential permits for that or any

future CPZ. In order to establish the CPZ, the Council would require £56,500 towards consultation and implementation of a CPZ. The Transport Assessment submitted in support of the previous scheme states that the CPZ would be created and funded by the applicant, which is still the case. The scope of the CPZ will need to be agreed with officers.

- 19.11 The proposed car free development can only be supported with the CPZ, improvements to the local cycling offer and general Sustainable Transport contributions in line with our contributions calculator. This is expected to equal £43,371, to be paid towards sustainable transport measures.
- 19.12 The Car Park Management Plan submitted states:
- Parking spaces would be leased to those with the most genuine need and demand for each type of bay would be monitored.
 - The car park would be managed by an external management company to prevent any misuse of parking bays, with all necessary signage and lining maintained in perpetuity.
 - Additional disabled car parking provision could be achieved through the conversion of other parking bays in the future, if there was an identified need.
- 19.13 The number of car parking spaces is reduced from 10 to 9, to avoid detrimental impacts to root protection areas. Therefore, an updated Car Park Management Plan has been requested via condition to reflect this.
- 19.14 The proposal provides 180 long-stay and 10 short-stay cycle parking spaces, which exceeds the London Plan requirement of 179 long-stay and 4 short-stay spaces.
- 19.15 As explained in the 2022 Committee Report, due to the low PTAL there would also be an expectation that significant improvements to the cycling offer to the local community, further our Healthy Streets team stated that there is an ambition to improve the crossing opposite the site on Carterhatch Lane, as well as the cycle lane width on the northern side adjacent to the development. Since the standard contributions expected from a scheme of this size towards Cycle Enfield would be in the region of £31,460 (based on our contributions calculator) this could take the form of a sliver of land on the Carterhatch Lane / Hertford Road frontages being contributed, and money towards the works required.
- 19.16 Officers have raised concerns about the design of the cycle parking spaces. Therefore, a condition will request the detailed design of all cycle parking areas, to address officers' comments.

Delivery and servicing

- 19.17 The proposal includes a lay-by and is supported by a Delivery and Servicing Plan (DSP) submitted for the previous scheme.
- 19.18 With regards to servicing, we are concerned that the development places the burden of this onto Moorfield Road, by creating an on-street servicing layby on the public highway. Again, it is considered that in order to avoid disbenefit to the public, we would require that land to the front of the site on Carterhatch Lane / Hertford Road is passed to the Healthy Streets team to allow for further improvements to the highway and cycle infrastructure around the site.
- 19.19 If an on-street bay is created, it is important to maintain the footway around it, which does appear to encroach into the red line of the site. Officers require the applicants to

fund the construction of the bay and the required orders for the double yellow line markings that would ensure the bay could only be used for loading and drop off / pick up.

Waste Management

- 19.20 London Plan policy SI 7 seeks to promote a more circular economy that improves resource efficiency, recycling and reductions in waste going for disposal. Referable applications should promote circular economy outcomes and aim to be net zerowaste. Core policy 22 of the Core Strategy states that the Council will:
- encourage on-site reuse and recycled materials,
 - encourage on site reuse and recycling of construction, demolition and excavation waste;
 - require appropriate provision to be made for on site waste treatment, storage and collection throughout the life time of the development.
- 19.21 The plans submitted show that refuse and recycling will be located at ground floor level. Adequate storage space for refuse bins will be available. A condition has been attached requiring details of refuse storage to be submitted to the Council and approved in writing. The applicant would need to demonstrate that the capacity of the refuse bins to meets the requirements of ENV08/162.
- 19.22 The applicant updated the Circular Economy Statement, which demonstrates that the proposed development has applied circular economy principles in line with the above London Plan policy. Officers are satisfied with the findings of this report.
- 19.23 A Waste Management Plan has been submitted, in line with Policy DMD 57, setting out the following:
- Suitable waste storage arrangements are incorporated within the site and would be maintained in perpetuity. These provide sufficient storage capacities and convenient access routes;
 - An 11.0m refuse vehicle represents the largest vehicle anticipated at the site, which would be used infrequently (once per week) and could safely and conveniently access the site within 10m of the bin store;
 - Waste would be collected by the Council as part of an existing route;
 - The building management company would have overall responsibility for enforcing this Management Plan and would liaise accordingly with relevant stakeholders;
 - The bin store would be maintained in a clean and clear manner, with separate waste and recycling streams clearly labelled.

20. **Flood Risk and Drainage**

- 20.1 This submission is accompanied by an updated Flood Risk Assessment and Drainage Strategy.
- 20.2 Policy DMD59 states that new development must avoid and reduce the risk of flooding, and not increase the risk elsewhere. Policy DMD 61 states that a drainage strategy will be required for all development to demonstrate how proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan. The policy requires that a development such as the one proposed must achieve greenfield run off rates and must maximise the use of SuDS by including several treatment phases.

- 20.3 It is proposed that surface water runoff from the block will discharge via a green roof with permavoid storage to the proposed surface water network, and on to the existing Thames Water surface water network. All surface water runoff from the parking and access routes will be discharged via permeable paving, and sub base storage will provide online attenuation for large storm events, up to and including the 1 in 100 year + 40 climate change. This SuDs scheme takes in to account the Pluvial flood risk and mitigates the affects the development may have on the surrounding area.
- 20.4 Peak foul flow rate from the proposed site is predicted to be 4.63 l/s. Wastewater from the block will be collected and conveyed via gravity to the existing foul sewer in north west of the site. An agreement with Thames Water will need to be in place prior to a connection being made to their network.
- 20.5 SUDs Officers advised that the design flood event that needs to be assessed is the 1 in 100 year + (17%) climate change event, and that the proposed discharge rate is above the correct greenfield QBAR rate for the site.
- 20.6 Accordingly, additional information has been requested, including:
- Re-calculating finished floor level (FFL), to be at least 150mm above the 1 in 100 year (plus climate change) surface water flood depth.
 - Further details of level flood compensation.
 - Further details of SuDS measures.
- 20.7 Officers noted that, in principle, a suitable flood risk and drainage scheme can be achievable on this site. A condition will be attached to request a detailed drainage strategy for approval pre-commencement of any development.
- 20.8 The applicant confirmed that officers' comments can be addressed and that this will be done as part of a Flood Risk and Drainage Strategy Update. Officers will review the Update and their comments will be reported to the Planning Committee as an Addendum to this Report before the meeting. Furthermore, conditions will be added, as required, to ensure that the proposed flood risk and drainage strategy is acceptable and that it is implemented in accordance with the submitted details.
- 20.9 Existing surface water sewers which cross the site will need to be protected or diverted in accordance with Thames Waters requirements.
- 20.10 Thames Water have confirmed that they have no objections to this updated proposal.

21. **Carbon Emissions and Sustainability**

Operational carbon emissions

- 21.1 Policy DMD 49 states all new development must achieve the highest sustainable design and construction standards and include measures capable of mitigating and adapting to climate change to meet future needs having regard to technical feasibility and economic viability. Policy DMD51 states further energy efficiency standards and that all developments will be required to demonstrate how the proposal minimises energy- related CO2 emissions which must adhere to the principles of the energy hierarchy in the policy. This follows policy CP20 of the Core Strategy which states that the Council will require all new developments, and where possible via retrofitting process in existing development to address the causes and impacts of climate change by: minimising energy use; supplying energy efficiently; and using energy generated from renewable sources in line with the London Plan and national policy. The adopted

policies require that new developments achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability. A 35% CO2 reduction is required for new residential units.

- 21.2 An updated Energy Strategy Report demonstrates the use of passive design measures, provision of energy efficient servicing systems and specification of low and zero carbon energy sources would result in a significant reduction in regulated domestic carbon dioxide emissions for the proposal. There will be an overall improvement in emissions over the Building Regulations Part L standards for regulated emissions of 72%, which exceeds policy requirements and is supported by officers. A condition requires the development to be implemented in accordance with the submitted Energy Strategy Report.
- 21.3 Two forms of renewable technology are proposed for the scheme – Air Source Heat Pumps (ASHPs) and photovoltaics (PVs). A communal ASHP system will serve the thermal loads of the apartments. A 17.75kWp PV installation is also proposed on the roof of the development.
- 21.4 A communal heat network is proposed as part of the development proposals to facilitate the future connection of the scheme to any potential future district heating network in the vicinity of the development.

Overheating

- 21.5 The Energy Strategy Report explains that passive overheating mitigation measures have been implemented, including but not limited to sensible glazing provisions, solar control glazing and recessed windows.
- 21.6 The strategy applies to both apartments that will be able to open their windows to mitigate overheating risk and for apartments that won't, because of acoustic constraints.

Water efficiency

- 21.7 As noted in the 2022 Committee Report, details of water efficiency measures would also need to be provided to demonstrate water consumption per person per day equal to or less than 105 litres. A condition requiring compliance with these details has been imposed.

Climate Change

- 21.8 The updated Whole Life Carbon Assessment demonstrates that the proposed development would be consistent with GLA standards.

22. Health

- 22.1 The proposed development would be expected to result in the provision of housing, additional local spending by residents of the new development, and the provision of private amenity space. Taking the above into consideration, overall it is considered that some positive environmental effects on socio-economics would arise as a result of the development.

23. Environmental Considerations

23.1 Environmental Health have reviewed the application and have no objections subject to conditions pertaining to noise from plant and Non-Road Mobile Machinery (NRMM).

23.2 The officer also confirmed that there are no concerns regarding contaminated land and air quality subject to the attachment of conditions.

24. Education

24.1 The scheme will be liable for education and childcare contributions for the net increase of units on site, in accordance with the adopted s106 SPD. These contributions will be secured via an s106 legal agreement.

25. Fire Safety

25.1 In accordance with Policy D12 'Fire safety' of the Mayor's London Plan, the applicant has submitted a Fire Statement addressing Building Regulations and London Plan Policies, and the requirements of Planning Gateway One, produced by a third party suitable qualified assessor. Information is provided on means of escape, features to reduce risk to life such as sprinklers and access for fire service personnel.

25.2 The building is served via three stairs that are non-accessible to each other on the upper floors. One set of stairs is located within the 3 storey block, whilst the other two are in the 12 storey block. Meeting regulations, one of two stairs will be a dedicated firefighting stair, and the other a protected escape stair.

25.3 There will also be three passenger lifts, one will be a dedicated firefighting lift (within the 12 storey block) and the other two are dedicated evacuation lifts.

25.4 The design of Moorfield Road residential development, with regard to fire safety, has been developed to exceed the minimum requirements of Part B of the Building Regulations 2010 (as amended) and the London Plan Policies D5(B5) and D12.

25.5 A detailed review of the external wall details proposed has been undertaken, and the major components have been specified to exceed the minimum required by Building Regulation 7(2).

25.6 All apartments are to be provided with fire detection, alarm systems and sprinkler systems. Ground floor ancillary spaces will also have dedicated fire detection and alarm systems installed.

25.7 Fire service access into the building will be from the outside of the building via one of the two stairs from Moorfield Road. The maximum horizontal distances from the fire service vehicle parking position on Moorfield Road are well within the limits provided in BS 9991.

26. Secure by Design

26.1 The Designing Out Crime Officer is unable to support the scheme, raising concerns that the design could contribute to and might increase the opportunity for crime and anti-social behaviour at this location, putting the new and existing residents at risk, if further information is not provided. In order to manage this risk, a prior to occupation condition has been suggested, that requires Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards

submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police.

27. Community Infrastructure Levy (CIL)

Mayoral CIL

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

27.2 Although the proposal would be Mayoral CIL liable, as all the units proposed are social housing it would benefit from relief and no CIL would be payable.

Enfield CIL

27.3 The Council introduced its own CIL on 1st April 2016. Enfield has identified three residential charging zones, and the site falls within the lower rate charging zone (£40/sqm).

27.4 As explained above, although the proposal would also be Enfield CIL liable, as all the units proposed are social housing it would benefit from relief and no CIL would be payable.

28. **Public Sector Equality Duty**

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

29. **Conclusion**

29.1 2 Moorfield Road is a brownfield site which has been vacant for the past 6 years. It is now boarded up, to avoid instances of vandalism and anti-social behaviour. Despite the low PTAL rating, the site is well connected to bus services, within 20 minutes walk from the nearest railway and Overground stations, and at the edge of Enfield Highway Local Centre.

29.2 The principle of development, demolition of the former NHS building and redevelopment of the site for residential use, was established with the previous proposal and is fully supported by officers.

29.3 This is the second time a scheme for this site is presented before Planning Committee. The first proposal was recommended for refusal as it was considered overdevelopment of the site, providing poor amenity standards to future and neighbouring residents, as well as unacceptable impacts on the trees.

29.4 The scheme proposes 100 residential units, 100% affordable (social rent). There is a small reduction in units from 106 to 100. Although this is regrettable, it has also resulted in several improvements that, on balance, result in the proposals being acceptable.

- 29.5 The housing need in the borough is even more pressing than in March 2022. Therefore, the current offer of 100% affordable housing at social rent is significant and is attributed significant weight planning balance.
- 29.6 The revised design creates improved quality of accommodation, minimal negative impact on trees, and an aesthetically pleasing design, with a stepped approach to the height, creating visual interest. overall a better design.
- 29.7 Daylight and sunlight levels within the development and neighbouring properties are now acceptable. Where levels of change in daylight are more pronounced, this occurs in properties where windows are located beneath an access deck, or where there are double aspect rooms, or in bedrooms and kitchens (where BRE guidance confirms daylight is of less importance). Even in these instances, the retained daylight levels are considered appropriate in an urban context, and taking into account the tilted balance in favour of approving schemes for residential development.
- 29.8 Therefore, considering the important benefits of the scheme in the form of 100 affordable units, the numerous improvements on the previous scheme, the presumption in favour of approving sustainable development and the balance in favour of approving schemes for residential development, it is considered the 12 storey element can be accepted, in the context of the location and the 100% social rent affordable housing offer which would be secured through a legal agreement.
- 29.9 Redeveloping this underused brownfield site provides an opportunity to make a positive contribution towards Borough and wider London housing needs – helping Enfield to support its growing population.
- 29.10 To conclude, all the reasons for refusal of the previous scheme have been positively addressed and, subject to conditions and a satisfactory legal agreement being signed, the proposal is recommended for approval.



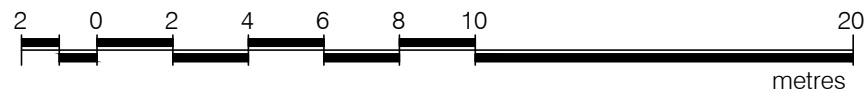
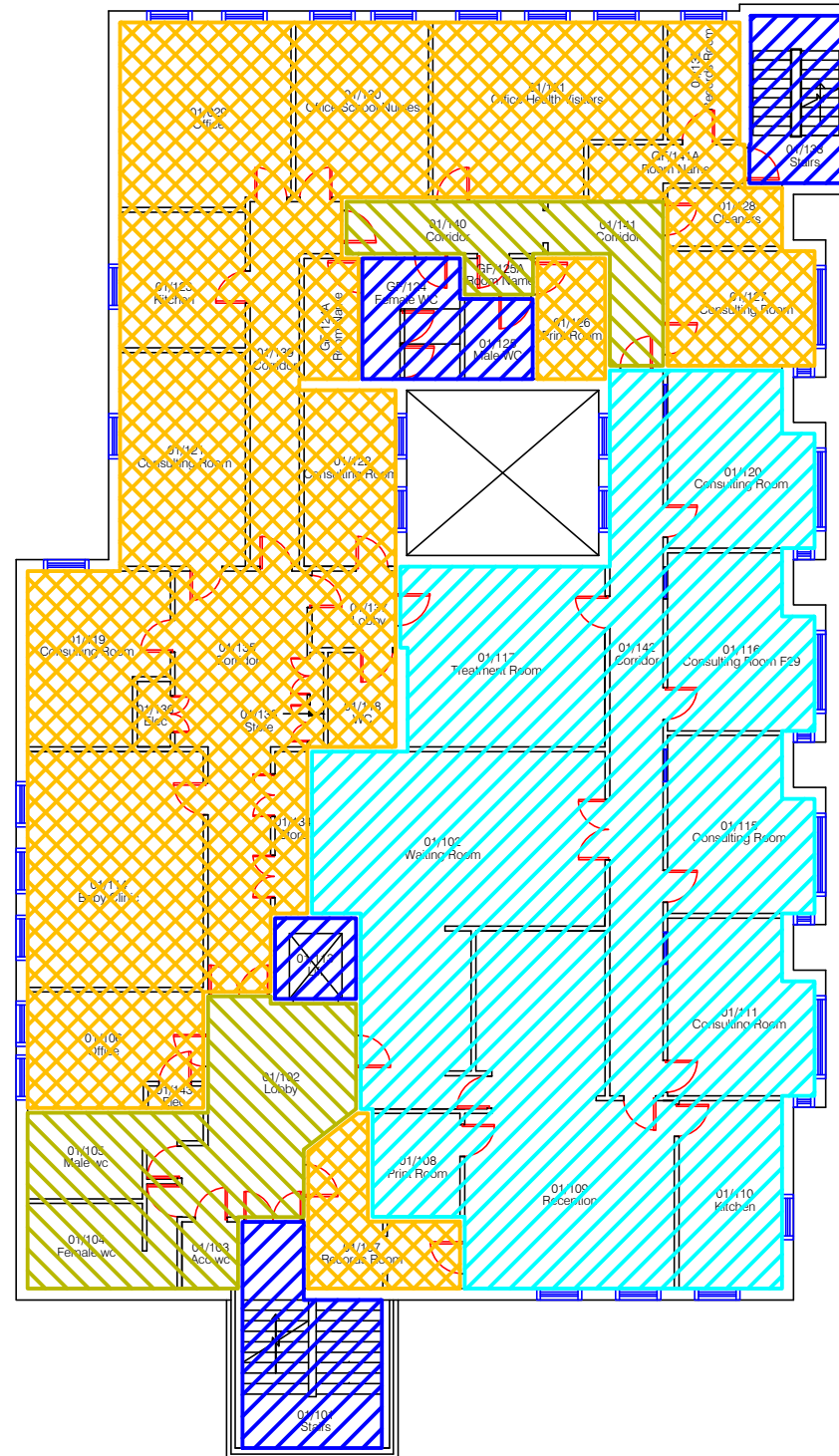






Approximate Direction North

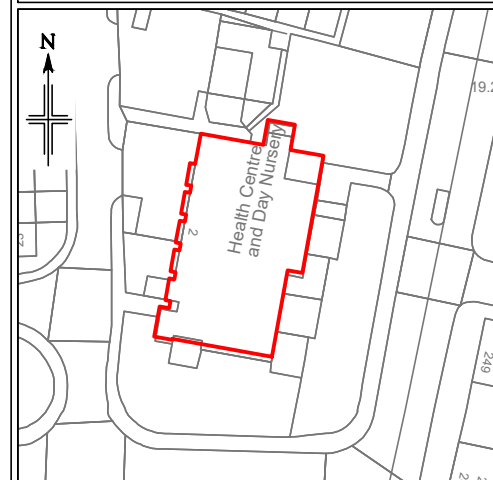
	02200	NIA	242.35 m ²
	NHSPS Vacant	NIA	282.66 m ²
	NHSPS Shared Area	NIA	60.93 m ²
	NHSPS Common Parts	GIA	45.59 m ²



First Floor
 GEA 690.90 m²
 GIA 645.11 m²
 NIA 592.88 m²

CAD EXERCISE ONLY

This drawing has been made compliant by Plowman Craven using drawings supplied by NHS Property Services.
 Plowman Craven accept no responsibility for floor plan inaccuracies. This floor plan has not been verified by on-site measurements.



Location Plan

Scale 1:1250

Building Outline

Care should be taken when drawings are printed to avoid image distortion. This plan has been compiled from client supplied drawings.

This drawing is issued for lease registration purposes only and further copies should be printed under the appropriate licence.

This drawing contains Ordnance Survey data which has been reproduced with the permission of the Controller of Her Majesty's Stationery Office, Crown copyright 2016.

This Ordnance Survey data has been obtained and reproduced by Plowman Craven Ltd under Contractor Licence in agreement with NHS Property Services PSMA member Licence dated 18th December 2015.

Notes:

Date	Comments	Rev.



Property Services

Site Address

MOORFIELD ROAD HEALTH CENTRE
 MOORFIELD ROAD
 ENFIELD
 EN3 5TU

Site	Orig.	Role	Level	Type	Rev.
MRHC01B01	PC	CAD	01	FP	R04

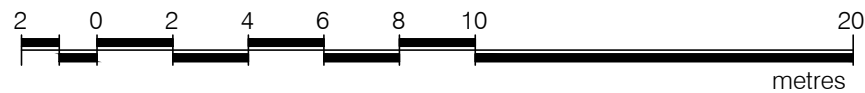
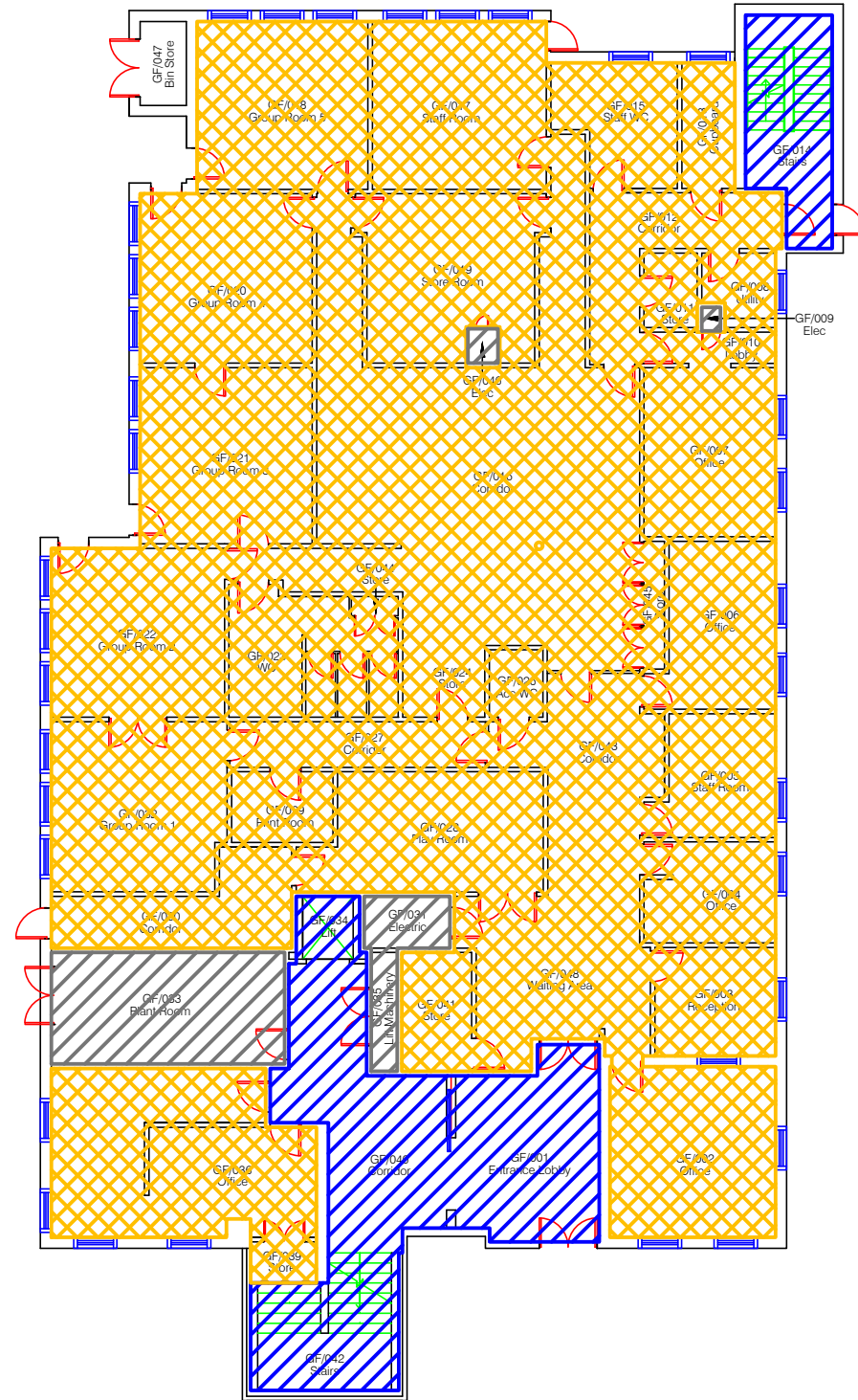
Floor/Level FIRST FLOOR

Scale 1:200 @ A3

Date OCTOBER 2018



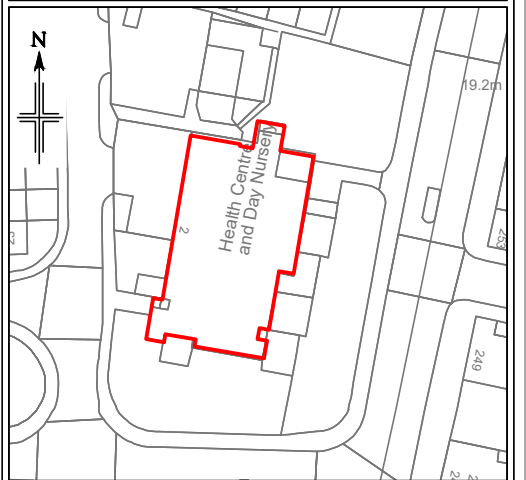
- NHSPS Vacant
 - NHSPS Common Parts
 - NHSPS Retained Area
- NIA 537.1 sq m
GIA 75.11 m²
GIA 26.84 m²



Ground Floor
GEA 690.96 m²
GIA 654.83 m²
NIA 537.07 m²

CAD EXERCISE ONLY

This drawing has been made compliant by Plowman Craven using drawings supplied by NHS Property Services.
Plowman Craven accept no responsibility for floor plan inaccuracies. This floor plan has not been verified by on-site measurements.



Location Plan

Scale 1:1250

Building Outline

Care should be taken when drawings are printed to avoid image distortion. This plan has been compiled from client supplied drawings.

This drawing is issued for lease registration purposes only and further copies should be printed under the appropriate licence.

This drawing contains Ordnance Survey data which has been reproduced with the permission of the Controller of Her Majesty's Stationery Office, Crown copyright 2016.

This Ordnance Survey data has been obtained and reproduced by Plowman Craven Ltd under Contractor Licence in agreement with NHS Property Services PSMA member Licence dated 18th December 2015.

Notes:

Date	Comments	Rev.



Property Services

Site Address

MOORFIELD ROAD HEALTH CENTRE
MOORFIELD ROAD
ENFIELD
EN3 5TU

Site	Orig.	Role	Level	Type	Rev.
MRHC01B01	PC	CAD	GF	FP	R02
Floor/Level			GROUND FLOOR		
Scale			1:200 @ A3		
Date			OCTOBER 2018		

Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.



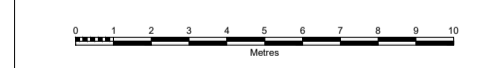
Legend:

Surfaces	
P1	Large Unit Paving
P2	Small Unit Paving for Vehicles
P3	Existing Footpath Paving

Edges, Walls & Boundaries	
E1	Concrete Pin Kerb
E2	Upstand Concrete Kerb
E3	Flush Concrete Kerb
W1	Brick Dwarf Wall
R1	Railing 1.5m ht
R2	Railing 1m ht

Lighting	
L1	Tree Up-lighter
L2	Column lighting

- Existing trees retained
 - Proposed trees
 - Extend of works on public highway
 - Areas of hand dig construction, sub base re-use and/or permeable make-up to be agreed with arboriculturalist and approved through condition
- Existing level Ex: 00.00 19.55^{RS}
Proposed levels Pr: 00.00 19.700



PA1 22.08.23 DBI Planning Addendum
 P01 10.09.20 JKE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ADDENDUM
 Client / project
Social Capital Partners
Moorfield Road
 Drawing title
Landscape
 General Arrangement Plan

drawing number revision
SHP-MRE-HTA-L-DR_2900 PA1
 scale @ A1 originated by project code
 1:200 MSA SHP-MRE



MOORFIELD ROAD

HERTFORD ROAD

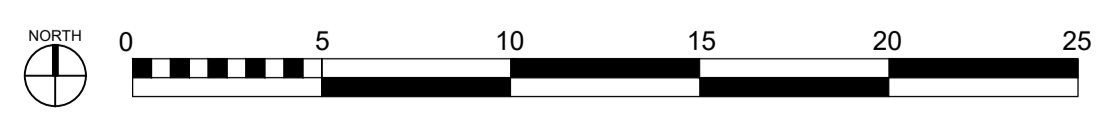
CARTERHATCH ROAD


CARTERHATCH LANE

Rev	Date	Drawn	Description
P01	10.09.20	RSH	PLANNING ISSUE
P02	15.12.21	RSH	UPDATED PLANNING ISSUE
P03	13.04.22	AKE	UPDATED PLANNING ISSUE
P04	03.08.22	NSH	FIRE UPDATE
P05	28.03.23	UNA	DRAFT REDESIGN

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.
 This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Legend



PROPOSED 3RD - 7TH FLOOR <small>drawing title</small>		P03 <small>drawing number</small>	P05 <small>revision</small>
SOCIAL CAPITAL PARTNERS MOORFIELD ROAD <small>client / project</small>		1:200 <small>scale @ A1</small>	SHP-MRE <small>project number</small>
<small>HTA Design LLP</small> <small>www.hta.co.uk</small> <small>London Edinburgh Manchester Bristol</small>		<small>originated by</small> RSH	
DRAFT <small>status</small>			

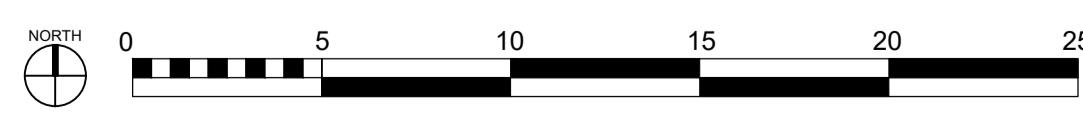


Rev	Date	Drawn	Description
P01	10.09.20	RSH	PLANNING ISSUE
P02	15.12.21	RSH	UPDATED PLANNING ISSUE
P03	13.04.22	AKE	UPDATED PLANNING ISSUE
P04	03.08.22	NSH	FIRE UPDATE
P05	28.03.23	UNA	DRAFT REDESIGN

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

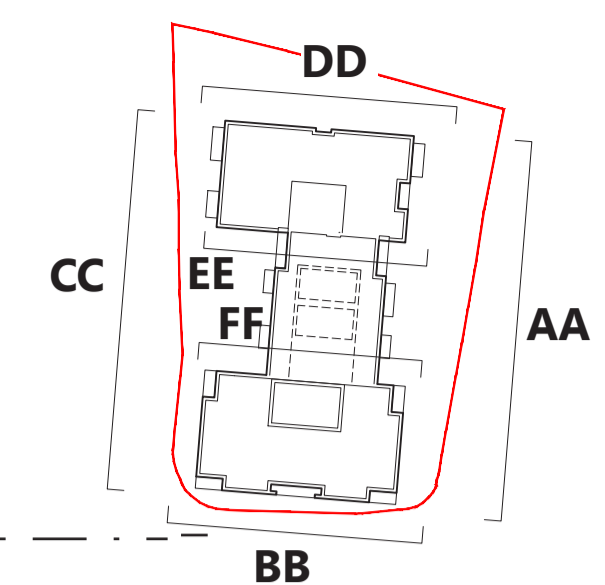
Legend



PROPOSED 8TH - 11TH FLOOR		AR08	P05
drawing title		drawing number	revision
SOCIAL CAPITAL PARTNERS			
MOORFIELD ROAD			
client / project	scale @ A1	SHP-MRE	RSH
		project number	originated by

DRAFT
status

HTA Design LLP
www.hta.co.uk
London | Edinburgh | Manchester | Bristol



Rev	Date	Drawn	Description
A	21.08.20	LSM	DRAFT PLANNING ISSUE
B	05.04.23	JWF	DRAFT REDESIGN

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.
 This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.
 Parapet +/- 200mm

- Legend**
- 1 - Light Buff stretcher brickwork
 - 2 - Light Buff soldier course brickwork
 - 3 - Dark Buff stretcher brickwork
 - 4 - Dark Buff soldier course brickwork
 - 5 - Powder coated aluminium windows - grey/green
 - 6 - Powder coated metal balustrade - off white
 - 7 - Grey/green louvred doors
 - 8 - Grey/green metal panel
 - 9 - Plant

East Elevation (AA)	AE250	B
drawing title	drawing number	revision
SOCIAL CAPITAL PARTNERS MOORFIELD ROAD	1:100 scale @ A1	JWF originated by
client / project	project number	status
FOR PLANNING	HTA Design LLP www.hta.co.uk London Edinburgh Manchester Bristol	hta

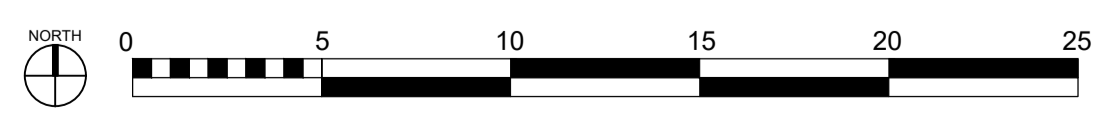


Rev	Date	Drawn	Description
P01	10.09.20	RS1	PLANNING ISSUE
P02	15.12.21	RS1	UPDATED PLANNING ISSUE
P03	13.04.22	AK1	UPDATED PLANNING ISSUE
P04	03.08.22	NSH	FIRE UPDATE
P05	28.03.23	UNA	DRAFT REDESIGN

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Legend



PROPOSED 1ST-2ND FLOOR AP01		P05
drawing title	drawing number	revision
SOCIAL CAPITAL PARTNERS		RSH
MOORFIELD ROAD		originated by
client / project	scale @ A1	SHP-MRE project number
HTA Design LLP	1:200	
www.hta.co.uk	scale @ A1	
London Edinburgh Manchester Bristol		

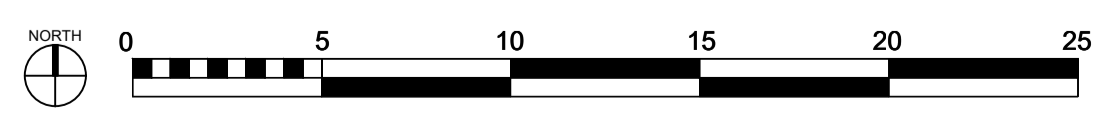
DRAFT
status



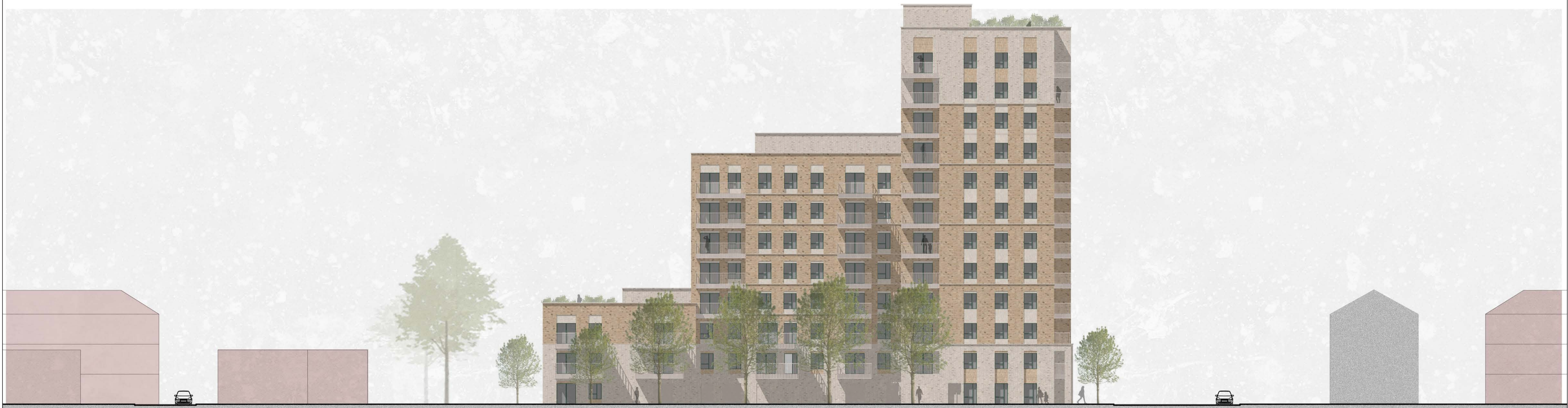
Rev	Date	Drawn	Description
P01	10.09.20	RSH	PLANNING ISSUE
P02	15.12.21	RSH	UPDATED PLANNING ISSUE
P03	13.04.22	AKL	UPDATED PLANNING ISSUE
P04	03.08.22	RSH	FIRE UPDATE
P05	28.03.23	UNA	DRAFT REDESIGN

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.
 This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

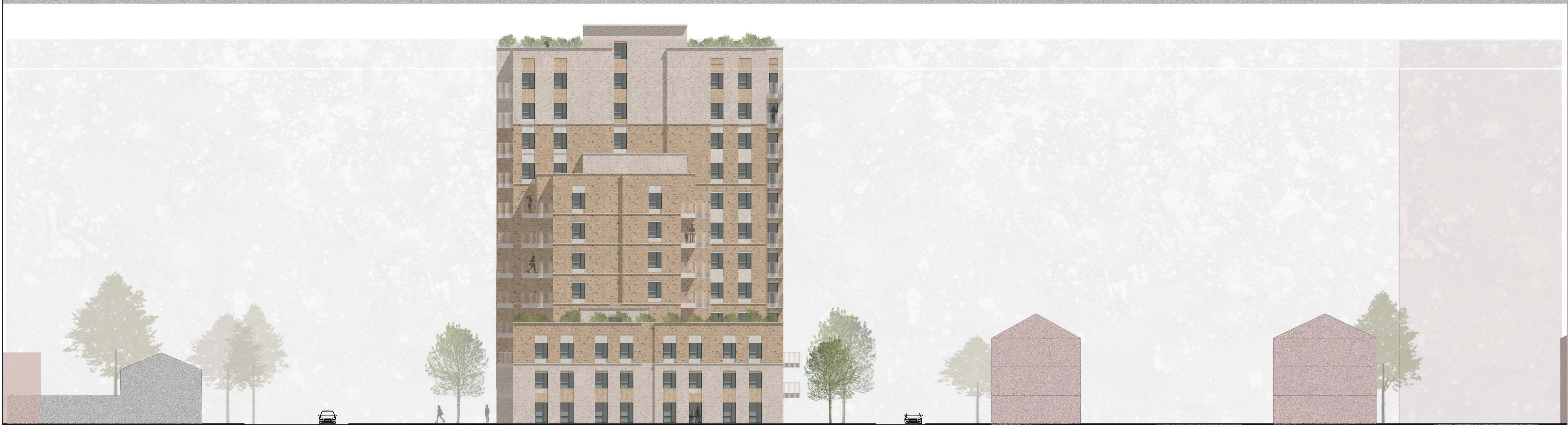
Legend



PROPOSED GF PLAN	AP00	P05
drawing title	drawing number	revision
SOCIAL CAPITAL PARTNERS		
MOORFIELD ROAD		
client / project		
1:200	SHP-MRE	RSH
scale @ A1	project number	originated by
HTA Design LLP		
www.hta.co.uk		
London Edinburgh Manchester Bristol		hta
DRAFT		
status		



West



South

Rev	Date	Drawn	Description
A	21.08.20	LSM	DRAFT PLANNING ISSUE
B	05.04.23	JWF	DRAFT REDESIGN

Notes:
Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

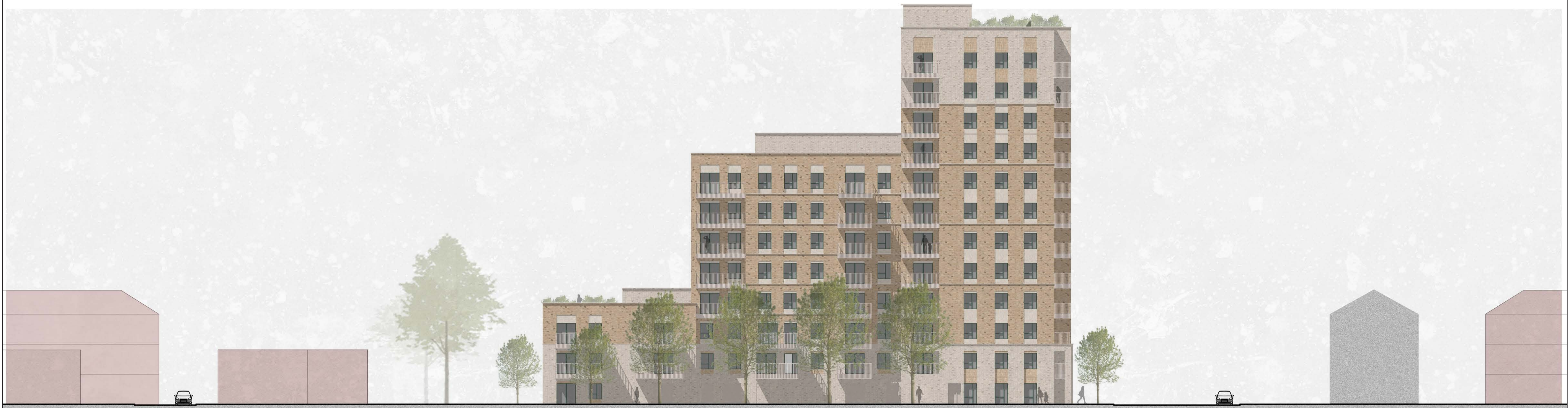
This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Parapet +/- 200mm

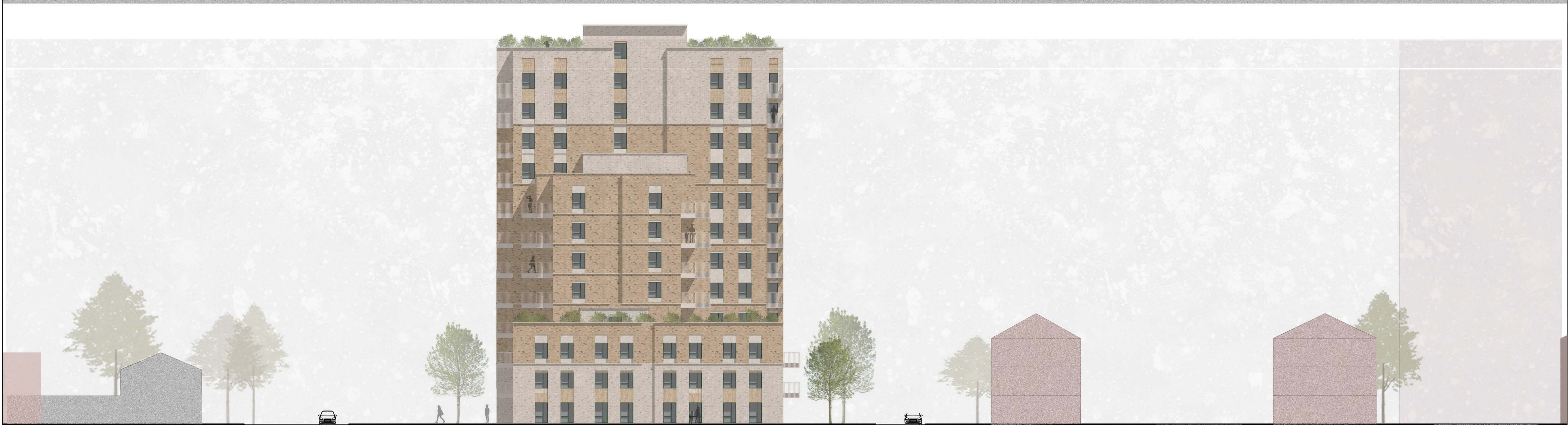
Legend

Proposed Long Elevations		AE257	B
drawing title West + North		drawing number	revision
SOCIAL CAPITAL PARTNERS		1:200	SHP-MRE
client / project MOORFIELD ROAD		scale @ A1	project number
DRAFT		HTA Design LLP www.hta.co.uk	JWF
status		London Edinburgh Manchester Bristol	originated by





West



South

Rev	Date	Drawn	Description
A	21.08.20	LSM	DRAFT PLANNING ISSUE
B	05.04.23	JWF	DRAFT REDESIGN

Notes:
Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

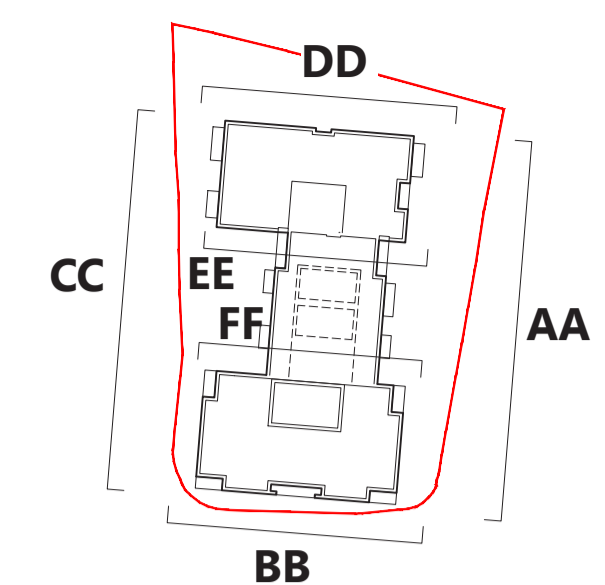
This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Parapet +/- 200mm

Legend

Proposed Long Elevations		AE257	B
drawing title: West + North		drawing number	revision
SOCIAL CAPITAL PARTNERS		1:200	SHP-MRE
client / project: MOORFIELD ROAD		scale @ A1	project number
DRAFT		HTA Design LLP www.hta.co.uk	JWF
status		London Edinburgh Manchester Bristol	originated by





Rev A 21.08.20 LSM DRAFT PLANNING ISSUE
 B 05.04.23 JWF DRAFT REDESIGN

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Parapet +/- 200mm

Legend

1 - Light Buff stretcher brickwork
 2 - Light Buff soldier course brickwork
 3 - Dark Buff stretcher brickwork
 4 - Dark Buff soldier course brickwork
 5 - Powder coated aluminium windows - grey/green
 6 - Powder coated metal balustrade - off white

7 - Grey/green louvred doors
 8 - Grey/green metal panel
 9 - Plant

North Elevation (DD)
 drawing title

AE253
 drawing number

B
 revision

SOCIAL CAPITAL PARTNERS
 MOORFIELD ROAD
 client / project

1:100
 scale @ A1

SHP-MRE
 project number

JWF
 originated by

HTA Design LLP
 www.hta.co.uk
 London | Edinburgh | Manchester | Bristol

FOR PLANNING
 status

hta

Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.



Legend:

Surfaces	
P1	Arrento Porcelain Paving Type1
P2	Arrento Porcelain Paving Type2

Edges	
M1	Raised metal planter
M2	Flush metal edge
M3	Porcelain Edging

Furniture and Lighting	
F1	Long timber seat
F2	Cube timber seat
F3	Table and chair set
F4	Table
F5	Assorted small planters
F6	Pergola with PV panels (indicative, lightweight construction to allow south facing planters to thrive below, refer to drawings by HTA-A).

Play Equipment	
E1	Play boulders
E2	Sensory chime
E3	Sensory play panel
E4	Log piles

- Proposed trees
Bp - *Betula pendula*
Al - *Amelanchier lamarckii* (Multi stem)
- Ornamental Planting:
Aucuba japonica
Stipa tenuissima
Euphorbia seguieriana niciana
Lavandula angustifolia 'Hidcote'
- Green Roof - Biosolar Roof System with ZinCo Pre-cultivated Mat "Sedum Carpet"

PA1 22.08.23 DBI Planning Addendum
 P01 10.09.20 JKE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ADDENDUM
 Client / project
Social Capital Partners
Moorfield Road
 Drawing title
Landscape
 Roofs Plan - General Arrangement & Planting

drawing number revision
 SHP-MRE-HTA-L-DR_2902 PA1
 scale @ A1 originated by project code
 1:200 MSA SHP-MRE

HTA Design LLP
 www.hta.co.uk
 London | Edinburgh | Manchester | Bristol



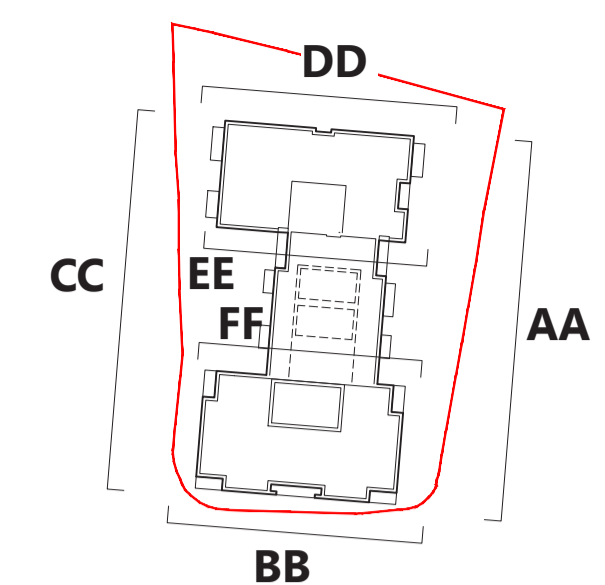
MOORFIELD ROAD

MOORFIELD ROAD

CARTERHATCH LANE

HERTFORD ROAD

CARTERHATCH ROAD



Rev A 21.08.20 LSM DRAFT PLANNING ISSUE
 B 05.04.23 JWF DRAFT REDESIGN

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Parapet +/- 200mm

Legend

1 - Light Buff stretcher brickwork
 2 - Light Buff soldier course brickwork
 3 - Dark Buff stretcher brickwork
 4 - Dark Buff soldier course brickwork
 5 - Powder coated aluminium windows - grey/green
 6 - Powder coated metal balustrade - off white

7 - Grey/green louvred doors
 8 - Grey/green metal panel
 9 - Plant

South Elevation (BB)
 drawing title

AE251
 drawing number

B
 revision

SOCIAL CAPITAL PARTNERS
 MOORFIELD ROAD
 client / project

1:100
 scale @ A1

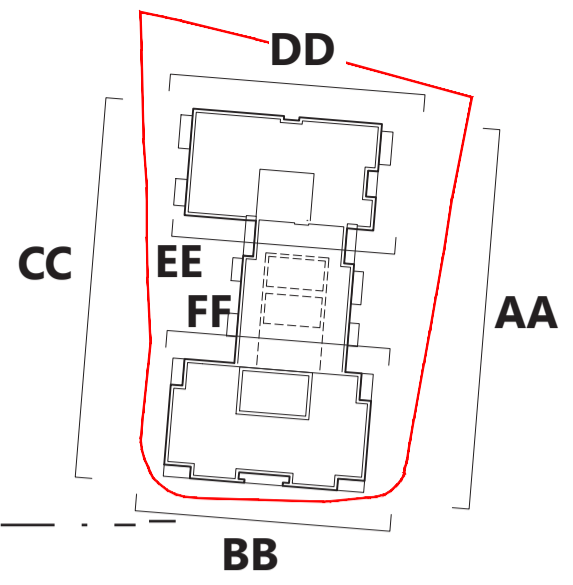
SHP-MRE
 project number

JWF
 originated by

HTA Design LLP
 www.hta.co.uk
 London | Edinburgh | Manchester | Bristol

FOR PLANNING
 status

hta



- ▽ Plant
- ▽ Parapet
- ▽ Roof
- ▽ 11th Floor
- ▽ 10th Floor
- ▽ 9th Floor
- ▽ Parapet
- ▽ 8th Floor
- ▽ 7th Floor
- ▽ 6th Floor
- ▽ 5th Floor
- ▽ 4th Floor
- ▽ Roof Terrace
- ▽ 3rd Floor
- ▽ 2nd Floor
- ▽ 1st Floor
- ▼ FFL +19.800
Ground Floor



Rev A 21.08.20 LSM DRAFT PLANNING ISSUE
 B 05.04.23 JWF DRAFT REDESIGN

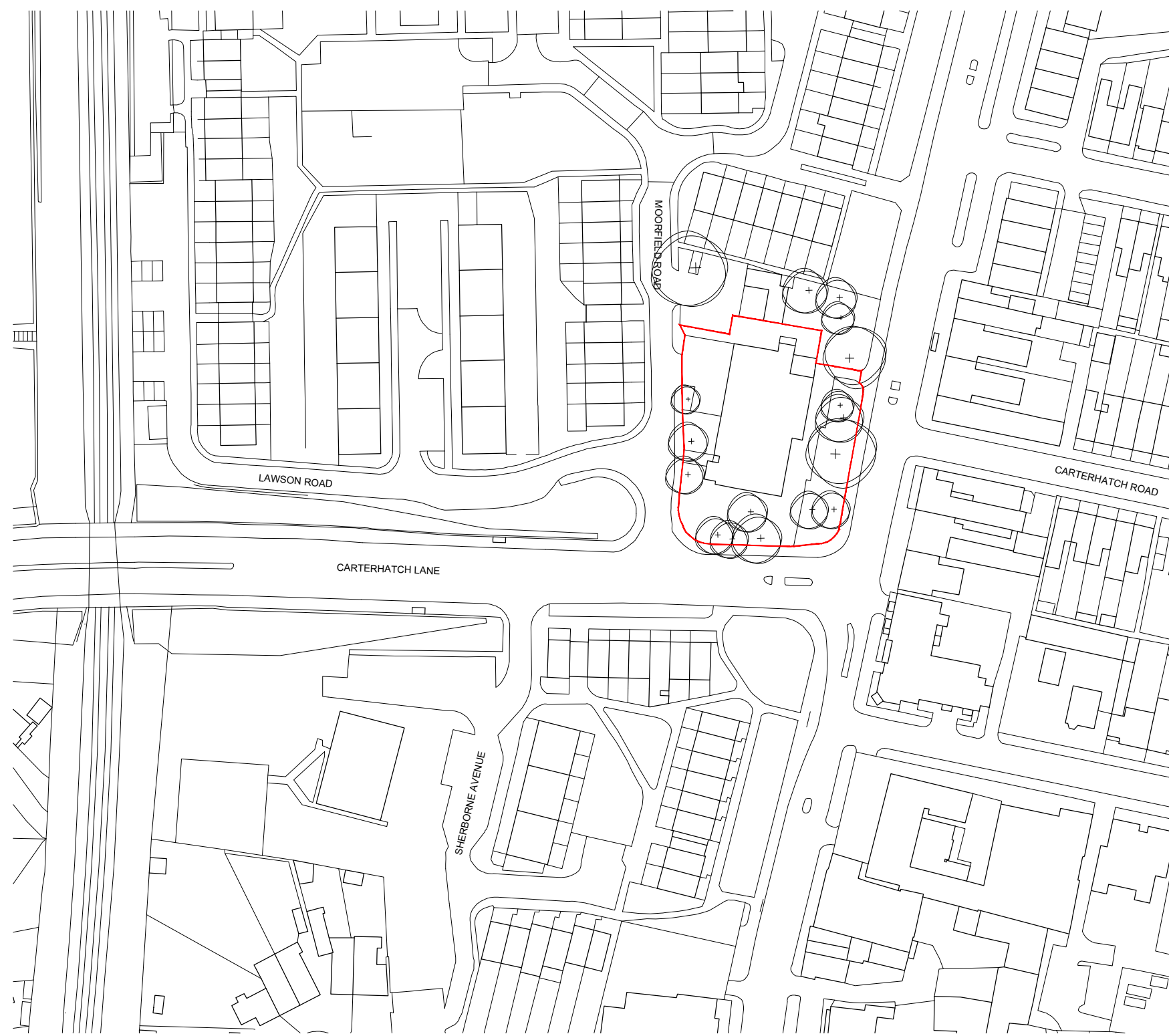
Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part, or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Parapet +/- 200mm

- Legend
- 1 - Light Buff stretcher brickwork
 - 2 - Light Buff soldier course brickwork
 - 3 - Dark Buff stretcher brickwork
 - 4 - Dark Buff soldier course brickwork
 - 5 - Powder coated aluminium windows - grey/green
 - 6 - Powder coated metal balustrade - off white
 - 7 - Grey/green louvred doors
 - 8 - Grey/green metal panel
 - 9 - Plant
 - 10 - Brick Colour-matched Service doors

<p>West Elevation (CC) drawing title</p> <p>SOCIAL CAPITAL PARTNERS MOORFIELD ROAD client / project</p> <p>FOR PLANNING status</p>	<p>AE252 drawing number</p> <p>1:100 scale @ A1</p> <p>HTA Design LLP www.hta.co.uk London Edinburgh Manchester Bristol</p>	<p>B revision</p> <p>JWF originated by</p>	<p>SHP-MRE project number</p>	
--	--	--	--	--



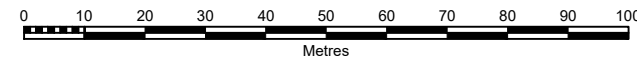
Rev Date Drawn Description
 P01 24.02.20 LSM Initial Issue

Notes:
 Do not scale from drawings unless by agreement with HTA. Use figured dimensions only. Check all dimensions on site prior to commencing the works. Drawing to be read in conjunction with other relevant consultant information.

Legend

This drawing is the copyright of HTA Design LLP and must not be copied or reproduced in part or in whole, without the express permission of HTA Design LLP. Drawing to be read in conjunction with specification.

Parapets allow a tolerance of +/- 250mm on every elevation.



Site Location Plan
 drawing title
 Social Capital Partners
 Moorfield Road
 client / project

0001
 drawing number
 1:1250
 scale @ A3

P01
 revision
 SHP-MFC
 project number
 LSM
 originated by

Concept
 status

HTA Design LLP
 www.hta.co.uk
 London | Edinburgh | Manchester | Bristol

