

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 19th September 2023

Report of
Director of Planning
& Growth - Brett Leahy

Contact Officers:
Kathryn Williams (KEW
Planning)
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.

ADDENDUM REPORT

1. Update to Planning Committee

- 1.1 Ahead of Tuesday's Planning Committee meeting, please note the following updates to the Committee report, to clarify points raised by consultees, will be of assistance to Members in your assessment of the proposals.

2. Consultation – Update

Housing Officer

- 2.1 Social rent is welcomed. The GLA will primarily allocate grant through the Affordable Homes Programme 2021-2026 for social rent calculated using the rent standard formula. If a scheme has not been approved or started on site prior to March 2023, this means grant for London Affordable Rent is no longer available to Registered Providers.
- 2.2 January 2023 housing need register figure appears to be low. At the end of March 2023 there were 6,761 households on the Housing Needs Register waiting to be housed or re-housed (770 households were existing Council tenants). There are 1393 households with a 1 bed need.
- 2.3 For the units to be truly affordable the discount depends on the size of the units provided. The table below provides the Government set rent caps for social rented properties. Based on those rent levels, for one-bedroom units to be affordable, the discount should be around 40%. However, discount increases substantially as the units become larger. For example, rent cap for a two-bedroom property in the area means 50% discount to what the cheapest advertised two-bedroom property is in the area. Cheapest three-bedroom property in the area is currently advertised at £1,950 and that means the rent cap is at 57% discount to that property. Therefore, it is difficult to generalize the discount rate. However, we can see at least 40% discount is required for smaller units and 50% discount to larger units.
- 2.4 [Formula rent caps](#) for 2023-24 are as outlined in the following table with added analysis:

Number of bedrooms	Weekly Rent cap	Monthly	Current rental properties in the one-mile radius (openrent.co.uk and zoopla)
1 and bedsits	£173.79	£753.09	Cheapest studio in the area currently marketed at £1,000 and cheapest one bedroom flat market at £1,200
2	£184.00	£797.00	Cheapest two-bedroom flat currently market at £1,550
3	£194.22	£841.62	Cheapest three-bedroom flat currently market at £1,950

Number of bedrooms	Weekly Rent cap	Monthly	Current rental properties in the one-mile radius (openrent.co.uk and zoopla)
4	£204.43	£885.86	Cheapest four-bedroom flat currently market at £2,000
5	£214.66	£930.19	No five bedroom property for rent in the one-mile radius. Last rental was advertised for £3,000
6 or more	£224.87	£974.44	No six-bedroom property for rent in the one-mile radius and no recent transactions I could see.

Highway Officer

- 2.5 The officer confirmed that the revised cycle parking is now acceptable. With regards to the provision of disabled parking bays (DPB), which is below the required 10%, the officer advised that a solution is to convert as much of the standard car parking to DPBs as is needed. There are other sites that have only provided the 3% of DPB spaces at the outset as required by the London Plan, and there has not been any scope to provide additional spaces. TfL are willing to consider contributions to improve disabled travel in the area as mitigation. It would not be acceptable to place DPBs within the new CPZ.
- 2.6 The officer confirmed that, with regards to financial contribution, the required money isn't for "Cycle Enfield" (the team that was dealing with what was previously called Cycle Enfield is now known as Journeys and Places and the money is towards Healthy Streets improvements). She also noted that although the 2022 reasons for refusal refer to the CPZ as a CPZ extension, this is a completely new CPZ, not an extension.

Urban Design Officer

- 2.7 Please see comments appended to this Addendum Report.

Drainage Officer

- 2.8 The Drainage Officer confirmed that the application can be recommended for approval subject to:
- An additional Technical Note being submitted
 - Flood mitigation related conditions
 - A clause in the legal setting out the cost per sqm for flood mitigation, should the development not be able to provide the whole extent of the required compensation area within the site

3. **Analysis – Update**

Housing

- 3.1 The Housing Officer confirmed that the social rent offer is welcomed, and confirmed that at the end of March 2023, there were 6,761 households on the Housing Needs Register waiting to be housed or re-housed (770 households were existing Council tenants). There are 1393 households with a 1 bed need.
- 3.2 This confirms that the redevelopment of 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.
- 3.3 The Committee Report states that to ensure that the units are truly affordable, social rent should be equivalent to 60% market rent. The officer advised that for the units to be truly affordable, the discount would depend on the size of the units provided. The discount will be agreed as part of the legal agreement.

Highways

- 4.1 Further to the publication of the Committee Report, the applicant has submitted revised plans and information that confirm the following:
- The entrance to cycle parking spaces has been increased to 1.20m and the proposed stands amended, as requested by the Highway Officer. Therefore, there is no need for a condition requesting the detailed design of the cycle parking areas.
 - The layout of the car parking spaces has been amended and 9 car parking spaces are now proposed, including 3 disabled parking bays.
 - Should the 10% disabled car parking spaces provision be required in its entirety in the future, the car parking layout can be amended to accommodate 8 car parking spaces including 6 disabled parking bays. Since the constraints of the site are such that it won't be physically possible to deliver 10 disabled parking bays, a contribution will need to be negotiated with TfL towards improvements to disabled travel in the area as mitigation. The applicant has been informed of this.
- 4.2 The Highway Officer raised concerns about the location of the short stay cycle stands, which are now located to the rear of the site, accessible from Moorfield Road but away from the site entrances.
- 4.3 Officers have taken a view that locating the short stay cycle stands in proximity to Moorfield Road is acceptable, on balance. Locating them next to the Carterhatch Lane entrance would have a negative impact on the private amenity of ground floor residents. Next to the Hertford Road entrance, they would have a negative impact on the quality of the area of communal open space. In proximity to the car parking spaces, the short stay cycle stands will still be overlooked by residents living at the upper floors of the development, and by residents living on the opposite side of Moorfield Road.
- 4.4 There will be a financial contribution towards Healthy Streets improvements, as the applicant is not able to provide any cycle parking on the land in front of the Carterhatch Lane and Hertford Road frontages, as this land is required to deliver private and communal amenity space for the future residents.

- 4.5 Finally, the officer clarified that, although the third reason for refusal in the 2022 committee report refers to an extension of the Controlled Parking Zone (CPZ), it is important to note that this will be a new CPZ, not an extension to an existing one.

Urban Design

- 5.1 The Urban Design Officer reiterated the concerns raised with the 2022 scheme. These are addressed in the paragraphs below.

Layout

- 5.2 The Arboricultural Officer confirmed that the impact on the existing trees is now acceptable, both in terms of canopy and root protection area.
- 5.3 In terms of ground floor amenity, the area to the north has been designated as an 'ecological garden', with access limited to maintenance. Details of this enclosure will be agreed via condition. Should Members request it, a condition could also be imposed requesting defensive planting to be located by the northern edge of the building.

Scale (Height and Massing)

- 5.4 This has been covered extensively in the committee report. The proposal represents a significant improvement on the 2022 scheme, in terms of articulation of the elevations, material palette, and private and communal amenity areas.
- 5.5 The building is located on a corner junction, at the edge of a local centre, in a locality where a number of tall buildings are already present: Hastings House to the south-east and clusters of towers at Eastfield Road and the western end of Ordnance Road.
- 5.6 In light of the considerations set out in the 2022 Committee Report (that 9 storeys would be acceptable, on balance, on part of the site) and the pressing local housing need, the proposed 3 and 8 storey elements are considered acceptable and an improvement on the previous scheme. The 12 storey element will front Carterhatch Lane and is taller than the 9 storeys previously proposed. However, in this revised scheme the tall element is limited to a single section of the proposed building, instead of the uniform 9 storeys of the 2022 scheme.
- 5.7 The building would not look out of place in long distance views, considering the presence of Hastings House. However, it will be clearly more prominent in short distance views. In the context of an increasingly urban and busy Hertford Road, the proposed tall element of the scheme will help wayfinding by signposting the northern section of the local centre. As this is no longer a large, monolithic block, the proposed tall element results in a more elegant addition to the local townscape.
- 5.8 Officers would have preferred a slightly lower height and a more significant set back from Carterhatch Lane, which would have lessened the impact on local views and on pedestrians' visual experience. The applicant was able to demonstrate that this would result in a series of drawbacks, including 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.
- 5.9 Whilst London Plan Policy D9 and Policies DMD 43 and 8 are noted, taking into account the proposed improvements to the scheme, the loss of residential units that

would result from a smaller scheme, and the tilted balance in favour of approving schemes for residential development, it is considered that the proposed height is acceptable, but only in the context of the location and the 100% LAR affordable housing offer, which would be secured through a legal agreement.

Density

- 5.10 On balance, taking into account of the improvements of the scheme and the tilted balance, the proposed density is considered acceptable.

Mix of uses

- 5.11 This was addressed in the 2022 Committee Report, where the removal of community space at ground level has been considered acceptable.

Landscaping

- 5.12 A Wind Microclimate Report has been submitted confirming that the rooftop garden is appropriate for use as a play area.
- 5.13 The officer advised that on street parking, or a rearrangement of the pavement could be used to provide street-based parking and free up space on site for play and greening. However, the Highway Officer had already advised that this would be acceptable.
- 5.14 The Arboricultural Officer confirmed that, subject to conditions, the proposed landscape strategy will not be harmful to root protection areas or tree canopies.

Details and Materials

- 5.15 Conditions will be imposed requiring samples of all external materials, as well as key details such as wall depth, to be agreed with the Urban Design Officer.

Quality of accommodation

- 5.16 The quality of accommodation (dual aspect) has improved compared to the 2022 scheme and on balance, we consider that it is acceptable.

Drainage

- 5.17 The Drainage Officer has been consulted, and we are awaiting a Technical Note to be submitted by the applicant shortly, which will include details such as required finished floor levels and amount of flood compensation required. The Drainage Officer confirmed that the application can be recommended for approval subject to:
- The Technical Note being submitted
 - Flood mitigation related conditions
 - A clause in the legal setting out the cost per sqm for flood mitigation, should the development not be able to provide the whole extent of the required compensation area within the site

Section 106 (Heads of Terms)

- 5.18 The below sets out the draft Heads of Terms which are to be finalised but must be included within the legal agreement.

- Affordable housing (100% social rent)
- Education (according to SPD, £2,525 per unit)
- Employment and skills
- Energy (Council's carbon fund)
- Health facilities and services
- CPZ (at this stage, £56,500 suggested)
- Sustainable Transport contributions (£43,371)
- Contribution towards Healthy Streets improvements (in the region of £31,460)
- Highway works (layby and pavement along Moorfield Road)
- TfL – contribution to mitigate DPB provision
- Flood mitigation (as relevant)
- Monitoring fee (5 per cent of the total value of all contributions; and a fixed charge to manage non-monetary obligations of £350 per head of term. Indexation will be applied)

Urban Design Consultation Response

13 September 2023

20/03011/FUL	Address: Moorfield Family Centre 2 Moorfield Road Enfield EN3 5PS
--------------	--

Scheme Description: 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)

Case Officer:	Kew Planning (Eloise Kiernan, Claire Williams – LBE Officers)	Urban Design Officer:	Michael Kennedy
----------------------	---	------------------------------	-----------------

Planning Policy Designations, Conservation Area etc	LVOAP NEEAAP Local Centre
--	---------------------------------

Please note:
These comments are internal only, intended as initial feedback to DM officers and may have been made without a site visit. Queries should be directed to the Urban Design Officer who will provide further advice and comment as required.

Summary and Overall Recommendation:

The Design Team broadly supports this proposal . Minor design development can realise a successful scheme.	
The Design Team requires revisions in key elements before supporting this proposal . Some policy requirements have not been met and further design development is necessary in order to address these elements and achieve a satisfactory scheme.	
The Design Team objects to this proposal . It does not meet policy requirements as identified below. Consider that complete redesign is necessary to address the issues.	

Recommend scheme is referred to the Enfield Design Panel (EDP)	Yes
--	-----

Urban Design Analysis	Meets Policy? (RAG)
DMD Policy 37 sets out the objectives of Urban Design. These Objectives are achieved through the careful consideration of physical aspects of development form that work together to produce functional, pleasant and safe environments.	
Character (including architectural quality): Locally distinctive or historic patterns of development, landscape and culture that make a positive contribution to quality of life and a place's identity should be reinforced. Reference: London Plan D1, D3, D4, D5, D8, D9; Local Plan CP 30, CP 31, DMD 6, DMD 8, DMD 37, DMD 40, DMD 44	
Continuity and Enclosure: Public and private spaces and buildings are clearly distinguished, safe and secure; All development should create safe and secure places and comply with the principles of Secured by Design . Reference: London Plan D3, D5, D6, D7, D8, D9; Local Plan CP 9, DMD 8, DMD 37	
Quality of the Public Realm: Safe, attractive, uncluttered and effective spaces and routes are provided Reference: London Plan D3, D4, D5, D6, D8, D9, D14, S4, S6, G4, G5; Local Plan CP 30, DMD 8, DMD 37, DMD 39	

<p>Ease of Movement: Development is inclusive, easy for all to get to and move around, connects well with other places, puts people before private vehicles and integrates land uses with sustainable modes of transport Reference: London Plan D2, D3, D5, D6, D7, D8, D9, D12; Local Plan CP 30, DMD 8, DMD 37, DMD 39</p>	
<p>Legibility: Development should be easy to understand with recognisable and intuitive routes, intersections and landmarks Reference: London Plan D2, D3, D3, D5, D6, D8, D9 D12; Local Plan CP 30, DMD 37, DMD 42, DMD 43</p>	
<p>Adaptability and Durability: Development should be durable and flexible enough to respond to economic, social, environmental and technological change. Its design and materials should ensure long term resilience and minimise ongoing maintenance Reference: London Plan D2, D3, D5, D6, D7, D11, D12; Local Plan CP 30, DMD 9, DMD 37, DMD 39, DMD 42</p>	
<p>Diversity: Where appropriate, development should provide variety and choice through the provision of a mix of compatible uses that work together to create viable places that respond to local needs Reference: London Plan D3, D5, D6, D7, D9, D9, S4, S6; Local Plan CP 5, CP 30, DMD 37</p>	
<p>Development suitable for its intended function (DMD 37) i.e. the quality of accommodation: e.g. Internal floor areas and the layout of accommodation meets the current space standards for residential development and the requirements set out within the Mayor's SPG on housing Reference: London Plan D3, D4, D5, D6, D7, D9, D13, S4; Local Plan CP 5, DMD 9</p>	

COMMENTS:

1 Summary

- 1.1 Overall the revised application does not resolve the design issues cited as reasons for refusal at the previous committee. It is the view of the urban design team that the scheme has not changed significantly enough to remove the fundamental objection to the level of development on the site, the height and the massing.
- 1.2 Whilst there has been improvement in certain areas (namely the reduction in height towards the north of the site resulting in less impact to neighbouring properties to the north) these are offset by increased harm and deviation from policy caused by additional height to the south, which remains too tall.

2 Layout

- 2.1 The layout of the building and hard landscape intrudes on the tree canopy of TPO trees to the east. This presents a risk to the survival of the trees during and post construction.
- 2.2 The removal of private gardens to the north of the site results in a reduction in amenity to the residents of the ground floor flats (balconies now face the road and parking bays) as well as presenting security issues to the rear gardens of the homes to the north.

3 Scale (Height and Massing)

3.1 The current proposal at 12 and 8 storeys is too tall. This is for the following reasons

3.1.1 A tall building is defined as “not be less than 6 storeys or 21 metres as measured from ground to the top of the building” As per London Plan policy D9, A and the Characterisation and Growth LPG 2.4.4 interpretation. Therefore the 12 and 8 storey elements of the building must be assessed as a tall building.

DMD 43 classifies a tall building as over 30m. However, this has been superseded by the London Plan 2021 definition (Policy D9)

3.1.2 The surrounding context is predominately 4 storeys in height meaning that 12 storeys is a considerable change in height adding to the perception of height. This is an increase of 3 storeys on the previously refused scheme. Fundamentally the development is out of scale with the predominate character of the area, the scale of buildings and represents too large a step change from the surrounding context to be acceptable. This is a suburban – local centre and the level of intensification should reflect this.

3.1.3 The site is inappropriate for a tall building due to its location in the borough. It is not in a sustainable location for height, nor does it mark an important and sustainable location, such as a town centre. London Plan 2021 D9, C1,b) requires tall buildings “**reinforce the spatial hierarchy of the local and wider context**”. This scheme does not as it directs wayfinding and importance away from the borough’s transport and activity centres, damaging legibility (also contradicting DMD 37).

3.1.4 DMD 43 states:

3. Applications for tall buildings in areas meeting the appropriate criteria may be acceptable in principle. The actual suitability of a proposal will always depend on the context of the site and details of the proposed building. Locations that may be appropriate for tall buildings are areas outside of those described above and which:

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

In the majority of cases more than one or all of the above criteria will need to be met, depending on the proposal.

The proposal does not satisfy any of these criteria and therefore cannot be considered to be in an appropriate location.

Taking these in turn:

- a) The site has a PTAL rating of 2 (poor) and is poorly located for rail travel (20mins walk to Brimsdown). Whilst there are bus routes on Hertford Road, this is not a well-connected site by public transport.
- b) Hastings House, a nearby tall building is noted in the application as a local precedent for height. The [2012 Report on Tall Buildings](#) (which forms the evidence base for DMD policy) assesses it as “Inappropriate Location, Inappropriate Building” (No. 30 Existing Tall building assessment map, pp 11.) this is not an appropriate place to create a cluster.

- c) The site is nearby Enfield Highway Local Centre, which is not classified within the important town centre hierarchy (e.g. not a district or major centre such as Enfield Town). It is a local centre of limited borough importance for legibility purposes.

- 3.2 A scheme of similar massing and lower height (4,9,11 storeys) to the current proposal was presented to design review on June 2020. Panel commented that **“The scheme is too tall in comparison to its surroundings. Apart from the nearby high-rise block (which itself demonstrates an inappropriate height) the proposed building would be substantially larger than its surroundings.”** Given the similarity in the size of the proposals, it is reasonable to apply the same assessment on height to this proposal.



Figure 1. Image of June 2020 DRP scheme. See attached DRP report for details.

- 3.3 It is noted that the applicant and case officer declined the opportunity to bring the scheme back to design review during the 2023 PPA process.
- 3.4 A more appropriate height of 6 storeys could be acceptable if it adheres to good urban design principles and provides a good quality of accommodation. This height should be less than the London Plan definition.
- 3.5 A degree of stepping up to a higher height on the corner could be acceptable with an overall reduction in height towards the north.
- 3.6 The three storey element to the north of the site is an appropriate scale of development in relation to the neighbours to the north.

4 Density

- 4.1 Overall the proposals represent an overdevelopment of the site. The desire to create 100 dwellings is forcing compromises in the design which undermine the acceptability of the proposal. The number of homes puts pressure on the building to increase in height and the overall footprint.
- 4.2 Whilst there is a need for more housing in Enfield development should be designed to optimise sites rather than maximise them. This proposal seems to be a case of maximisation rather than optimisation. This goes against good practice set out by the GLA in approaching development on sites.

- 4.3 Fundamentally the development proposes too many homes on a small, constrained site leading to many of the issues below. These should be seen as symptoms of this overdevelopment.
- 4.4 The 2021 Housing Economic Land Availability Assessment (HELAA) estimates a site capacity of 49 homes on the site –approximately half of that proposed in the application (100).
- 4.5 London Plan policy D3 “Optimising site capacity through the design-led approach” promotes working from the constraints of the site and sound urban design principles to realise the optimised capacity of the site. This proposal represents a maximisation of the capacity site as can be seen from the height, massing, quality of accommodation and impact on TPO trees.
- 4.6 A reduction in the number of homes on site would help to realise a successful scheme that optimises the site and resolves the issues below.

5 Mix of uses

- 5.1 A space for community or retail has been removed from the scheme. Which is regrettable.

6 Landscaping

- 6.1 The rooftop garden is potentially susceptible to high winds and an inclement microclimate. It must be demonstrated that this will be a functional and safe.
- 6.2 On street parking, or a rearrangement of the pavement could be used to provide street-based parking and free up space on site for play and greening.
- 6.3 The layout of the building and hard landscape intrudes on the tree canopy of TPO trees to the east. This presents a risk to the survival of the trees during and post construction contrary to DMD80.

7 Details and Materials

- 7.1 The quality of brickwork, balcony detailing windows and surrounding lintels appears to be of a high quality and carefully considered and work well with the surrounding context. The change to red brick and green glazed brick with green ironmongery and balconies is welcome as it ties in with key historic buildings in the area.
- 7.2 Further details of these should be included within the planning application – detailed sections explaining wall depths, build up and the general design intent as well as material design intent should be provided. Whilst individual materials can be agreed in conditions the design intent must be secured in these drawings.

8 Quality of Accommodation

- 8.1 Dual aspect levels are key measure of quality of accommodation and LP21 D6 requires dual aspect homes to be maximised (as does DMD 8 and Appendix 4 of the Development Management Document). At 64% dual aspect the scheme falls below the level achieved on other high density / tall building schemes approved in Enfield. In its own terms this low level represents a failure to meet D6.

8.2 Many of the single aspect flats look to the east where their light and views are interrupted by the protected trees and where residents will have no respite from the noise and pollution of Hertford Road.