LONDON BOROUGH OF ENFIELD							
PLANNING COMMITTEE	Date: 21 st November 2023						
Report of	Contact Officers:	Category					
Director of Planning & Growth Brett Leahy	Case officer: Aaron Hawkins Planning Decisions Manager - Sharon	Full Planning Application					
Words Didensing	Davidson						
Ward: Ridgeway	Councillor Request - No						

LOCATION: Arnold House 66 The Ridgeway Enfield EN2 8JA

APPLICATION NUMBER: 23/00032/FUL

PROPOSAL: Demolition of former care home and construction of a 95-bed care home, together with car parking (including basement car park), landscaped amenity areas and associated works.

Applicant Name & Address:

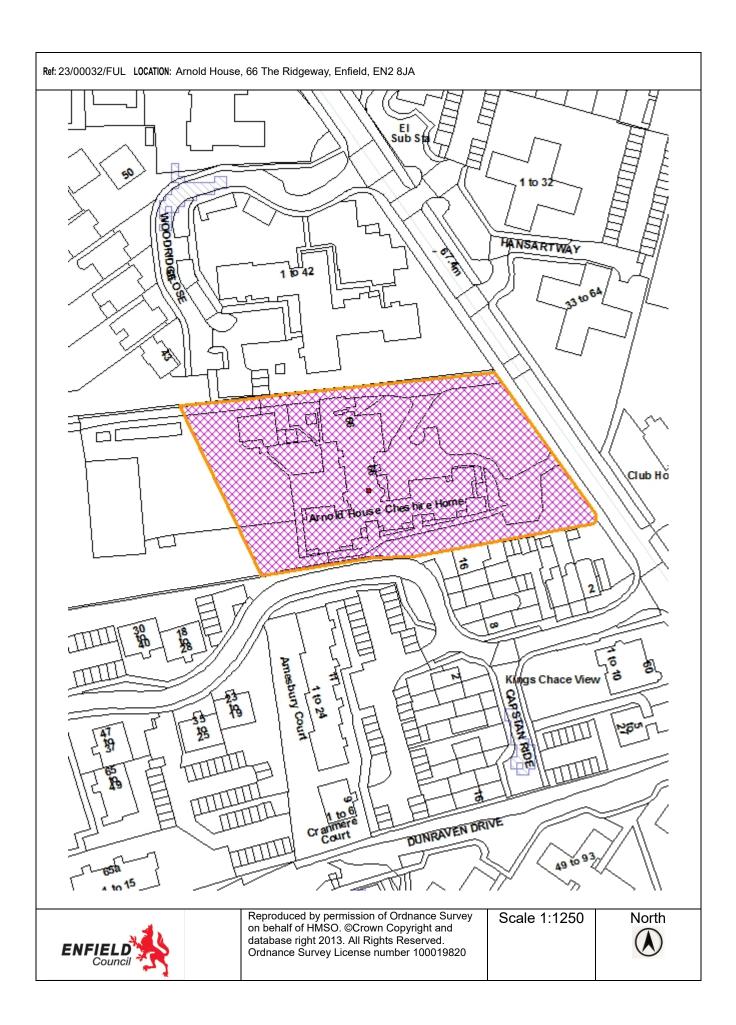
Geras Estates Limited 555-557 Cranbrook Road Ilford IG2 6HE

Agent Name & Address:

Mr Danny Simmonds RPS Planning & Development 20 Farringdon Street London EC4A 4AB SimmondsD@rpsgroup.com

RECOMMENDATION:

- 1. That subject to the finalisation of a S106 to secure the matters covered in this report the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions.
- 2. The Planning Decisions Manger be granted delegated authority to agree the final wording of the S106 Agreement and the final wording of the conditions to cover the matters in the Recommendation section of this report.



1.0 Note for Members

1.1 This planning application is brought to Planning Committee on account of the development categorised as a "major" development, meeting the exception criteria (1), "detailed applications for the erection of 10 or more residential units". In accordance with the scheme of delegation, is reported to Planning Committee for determination.

2.0 RECOMMENDATION:

- 2.1 That subject to the finalisation of a S106 to secure the matters covered in this report the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions.
- 2.2 That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

Standard Conditions:

- 1 Time limit
- 2 Accordance with plans
- 3 External Appearance (sample materials)

Design:

- 4 BREEAM
- 5 Details of Hard Standing
- 6 Cycle parking provision
- 7 ECV provision
- 8 Secure by Design

Landscape, Ecology & Trees:

- 9 Amended Landscaping Plan
- 10 Tree Protection Plan (Hard surfaces / drainage) & arboricultural supervision
- 11 Ecological enhancements verification

Sustainability

- 12 Circular Economy
- 13 Overheating Assessment

14 Compliance with Energy Statement

Drainage

- 15 Thames water (1) Foul sewage
- 16 Thames Water (2) Water infrastructure
- 17 SUDs verification

Specific site condition

- 18 Use of Care home (C2)
- 19 Construction Management Plan
- 20 Car Park Management Plan

3.0 Executive Summary:

- 3.1 The committee report seeks to outline the material matters for the recommendation of planning permission for redevelopment of the subject site involving the demolition of existing care home and erection of a 95-bed care home (C2 use). The site is designated as brownfield and currently occupied by a former care home and associated grounds. The subject site borders the designated Metropolitan Green Belt to the west and borders neighbouring residential properties to the north and south. To the east the subject site is bordered by the Ridgeway which provides the sole vehicular access point to the site.
- 3.2 The principal reasons for recommending approval are as follows,
 - i) The development supports meeting a strategic requirement for specialist (C2) development in a sustainable location as per policies in the adopted London Plan (2021), Enfield Strategic objective 4 of the Enfield Core Strategy (housing supply) and housing polices in the Enfield Development Management Document (Adopted 2014).
 - ii) The Care Home provides high quality specialist accommodation for primarily adults over the age of 80 across a total of 95 rooms. The 95 rooms are split over 4 floors with shared amenity spaces located throughout the development. The proposal will aid in fulfilling an established need within the borough for specialist housing (Care Home).

- iii) The proposed buildings are contextually appropriate for this site and with its wider setting, providing a tree lined internal street and satisfactory surface level parking provisions. The development provides onsite private and communal amenity space and retains a transition to the Green Belt to the west. The development would provide a good standard of accommodation for future occupiers.
- iv) The development will see the loss of foraging habitat, however this will be mitigated through the provision of bird and bat boxes creating viable habitats for bats and birds on site. While the development proposes an overall reduction in trees on site, all category A trees will be retained and will not be adversely affected by the redevelopment.
- v) The development scheme is considered to be acceptable, as it complies with the polices of the development plan when taken as a whole, subject to planning conditions and a signed legal agreement.

4.0 Site and Surroundings:

- 4.1 The subject site is designated as a brownfield site and currently occupied by a former care home and associated ancillary buildings and grounds. The site borders the designated Metropolitan Green Belt to the west and borders neighbouring residential properties to the north and south. To the east the subject site is bordered by the Ridgeway which provides the two vehicular access point to the site.
- 4.2 The former care home has been vacant for the past 2 years; the site also includes a number of ancillary buildings. The existing main building is two storey and sited broadly in the centre of the subject site. The site is screened by substantial vegetation along the eastern boundary, which obstructs the view of the existing building from The Ridgeway.
- 4.3 The wider location of the site marks the transition from urban residential to open farmland and countryside. The land to the west falls away creating an undulating landscape resulting in the former care home appearing prominent in the landscape.

- 4.4 The adjacent properties on The Ridgeway are a combination of semidetached properties to the south and residential buildings of ranging typologies (three to four stories). Residential properties feature substantial setbacks to The Ridgeway with ample vegetation and landscaping in keeping with the wider character of the area.
- 4.5 Land to the west of the subject site is undeveloped and falls within the Metropolitan Green Belt.
- 4.6 The subject site is within Flood Zone 1. Areas classified as Flood Zone 1 are those that have less than a 0.1% chance of flooding.
- 4.7 The subject site is not located in a Conservation Area and does not contain any Listed Buildings. However, the primary building is considered to be a non-designated heritage asset. The entirety of the subject site is covered by an Area Tree Preservation Order (TPOs) and those trees that existed at the point the Order was made (1975) are subject to protection.

5.0 Proposal:

- 5.1 The applicant seeks permission for redevelopment of the subject site involving the demolition of the existing care home and the erection of a four-storey care home set across two linked blocks (C2 use) with ninety-five (95) beds.
- 5.2 The ninety-five (95) bed care home (C2 use) would provide nursing and residential care to occupants for a wide range of different needs, but predominantly containing care for frail, older people and those with age related dementia. The care home will also provide the following facilities on top of the proposed ninety-five (95) beds:
 - 7 day lounges
 - 7 quiet rooms
 - Café / bistro
 - Games room
 - Tea room
 - Beauty salon
 - Drawing room
 - Study room and library
 - Cinema
 - Landscape amenity area

- 5.3 The proposed redevelopment will also include the following parking provisions:
 - 17 outdoor parking spaces (including 2 disabled spaces)
 - Basement car parking, providing 24 parking spaces
 - 40 space cycle stores available for staff
 - 5 Sheffield Standards (cycling parking) available for visitors at surface level
- Vehicle access will be provided through the subject sites existing access points along The Ridgeway towards the south of the subject site. The existing northern point of access will be closed to vehicles however will still be accessible to pedestrians as a secondary access point to the site's facilities.
- 5.5 20% of the proposed parking spaces (8) will be equipped with electronic vehicle (EV) charging points in line with the EV parking requirements of the London Plan. All parking spaces within the development will have provisions in place to allow for further EV expansion on the subject site.

6.0 Relevant Planning History:

- 6.1 18/00779/TPO 66 The Ridgeway Enfield EN2 8JA Fell x1 Oak tree covered by: LBE ORDER NO 14 (6) 1975. Refused 23 April 2018.
- 6.2 TP/04/1378/RM1 66 The Ridgeway, Enfield, EN2 8JA Submission of reserved matters in respect of design / appearance including levels and external and surfacing materials submitted pursuant to condition 2 and 3 for the erection of 15x4-bed, 2, 2.5 and 3-storey single family dwelling houses (comprising 6 pairs of semidetached town houses with Juliet balcony to first floor at front and front and rear dormers and 3 detached 2-storey houses) with off street parking and garages. Granted 12 August 2009. This permission has not been implemented
- 6.3 TP/06/2402 66 The Ridgeway, Enfield, EN2 8JA Erection of replacement 20-bed care home to rear of site, involving erection of a part single, part 2-storey building (lower ground level) together with construction of new access road and provision of associated parking (revised scheme). Refused 31 October 2007.
- 6.4 TP/04/1378 66 The Ridgeway, Enfield, EN2 8JA Redevelopment of site for residential purposes. (Outline application means of access, siting and landscaping). Granted with conditions 14 November 2006.

- 6.5 TP/04/1377 66 The Ridgeway, Enfield, EN2 8JA Erection of replacement 20-bed care home (plus 2 visitor suites) to rear of site, involving erection of a part single, part 2-storey building (lower ground level) together with construction of new access road and provision of associated parking. Refused 07 April 2006.
- 6.6 TP/95/1009 66 The Ridgeway, Enfield, Middlesex, EN2 Erection of single storey extension to front of existing building to provide additional staff dining room accommodation. Application withdrawn 24 September 1997,
- 6.7 TP/92/0207 66 The Ridgeway, Enfield, Middlesex, EN2 Erection f detached single storey building in grounds at rear of existing residential home for the disabled to be used as a day centre. Granted with conditions 18 February 1993.

7.0 Consultation:

7.1 Public Response

- 7.1.1 Consultation letters have been sent out to neighbouring properties during the period of the planning application. Letters were sent out on the 26/01/2023 and 443 neighbouring properties were notified.
- 7.1.2 At the time of writing the report the LPA had received 18 objections and the concerns have been summarised below,
 - Increase on-street parking within the surrounding area
 - Increase in traffic
 - Close to adjoining properties
 - Development too high
 - General dislike of proposal
 - Inadequate access
 - Increase of pollution
 - Not enough info given on application
 - Over development
 - Affect local ecology
 - Close to adjoining properties
 - Inadequate parking provision
 - Loss of parking
 - Loss of privacy
 - Noise nuisance
 - Out of keeping with character of area

Officer response to comments

- 7.1.3 The material planning concerns within the objection letters have been considered by officers during the determination of the planning application. Transport concerns have been raised via many objectors during the consultation period. The transport section of the report provides the position in regard to on-site parking and wider transport implications against adopted policy. Concerns raised throughout consultation have led to the proposals original parking provision to be amended to better accommodate the development's needs, this is outlined within the transport section of the report.
- 7.2 <u>Statutory and Non-Statutory Consultees:</u>
- 7.2.1 Transportation & Transport No objections subject to conditions as included in the recommendation section above .
- 7.2.2 Sustainable Drainage No objections subject to conditions included in the recommendation section above
- 7.2.3 Tree officer No objection is raised. Whilst there are a large number of trees proposed for removal, most are of lower value and removed internally from the site. The visual impact from the loss of these trees is acceptable. Tree loss is mitigated by the landscape and biodiversity measures proposed. Tree protection measures are sufficient and should be overseen by a project arborist. Conditions are recommended to secure tree protection, landscaping and biodiversity enhancements.
- 7.2.4 Environmental Health No objection subject to planning conditions. Conditions are included in the recommendation section above.
- 7.2.5 Sustainability officer Objection to the loss of existing building on sustainability grounds but satisfied overall with the sustainability credentials of the replacement development.
- 7.2.6 Health and Adult Social Care Whilst the older person provision is unlikely to be utilised by Adult Social Care Services due to high indicative placement costs, the Local Housing Needs Assessment (2020) does point to a wider need for good quality nursing and particularly dementia care provision for older people.

 Dialogue with Adult Social Care is encouraged to consider inclusion of affordable provision to maximise local use, plus consideration for a small number of fully

wheelchair accessible units for adults with physical disabilities, for which there is a current need.

- 7.2.7 Thames Water No objection to the sewage capacity locally for the development. Pre-commencement and occupation conditions to be applied to the scheme to secure the proposed surface water infrastructure would be required (see conditions section of the report)
- 7.2.8 Met Police if minded to approve, a Secure by Design condition should be applied. A condition is included in the recommendation section of this report.
- 7.2.9 Victorian Society Objection received due to the sites architectural and historical significance. The society also considers that the proposed demolition of viable existing buildings cannot be considered a sustainable form of development as the historic buildings contain a high amount of embodied carbon and should be reused. It is the Society preference that the building is retained within the redevelopment.

8.0 Relevant Policies:

NPPF (2023)

8.1 The National Planning Policy Framework sets out a presumption in factor of sustainable development. For decision taking this means:

favour

- "(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.
- 8.2 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."

- 8.3 The Council's recent housing delivery has been below our increasing housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and more recently being placed in the "presumption in favour of sustainable development category" by the Government through its Housing Delivery Test.
- 8.4 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.5 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of "presumption in favour of sustainable development.
- 8.6 In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 Enfield met 77% of the 2,394 homes target for the three-year period delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target and we now fall into the "presumption in favour of sustainable development" category. **new stats***
- 8.7 This is referred to as the "tilted balance" and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be

applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

8.8 Key relevant policy objectives in NPPF (2021) to the site are referred to below,

Section 8 – Promoting Healthy and safe communities, Para 92 & 97

Section 9 – Promoting sustainable transport, Para 104-113

Section 11 – Making effective use of land Para 119 -125

Section 12 – Achieving well-designed places, Para 126-136

London Plan (2021)

8.9 The London Plan (2021) was agreed by the Secretary of State, Published and adopted on the 2nd of March 2021. The London Plan 2021 replaces the 2016 London Plan and as such is given significant weight in determining of planning applications. Pertinent Policies in the London plan 2021 are outlined below,

GG1: Building Strong and Inclusive Communities

GG2: Making the best use of land

D4: Delivering good design

D5: Inclusive design

D7: Accessible Housing

D11: Safety, Security and Resilience to Emergency

D12: Fire Safety

D14: Noise

H12: Supported and specialised accommodation

S1: Social infrastructure

S2: Health and social care facilities

G5: Urban Greening

G6: Biodiversity and Access to Nature

G7: Trees and Woodland

SI2: Minimising greenhouse gas emissions

SI 7 Reducing waste and supporting the circular economy

SI3: Energy infrastructure

SI4: Managing heat risk

SI13: Sustainable drainage

SI5: Water Infrastructure

SI7: Reducing Waste and Supporting the Circular Economy

T1: Strategic approach to transport

T2: Healthy Streets

T3: Transport capacity, connectivity and safeguarding

T4: Assessing and mitigating transport impacts

T5: Cycling

T6: Car Parking

T7: Deliveries, Servicing and Construction

T9: Funding transport infrastructure through planning

Local Plan - Overview

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

8.11 Core Strategy (2010)

CP6: Meeting Particular housing needs

CP7: Health and social care facilities and the wider determinants of health

CP9: Supporting community cohesion

CP20: Sustainable energy use and energy infrastructure

CP21: Delivering sustainable water supply, drainage and sewerage

infrastructure

CP22: Delivering sustainable waste management

CP25: Pedestrians and cyclists

CP30: Maintaining and improving the quality of the built and open environment

CP32: Pollution CP36: Biodiversity

CP46: Infrastructure contributions

8.12 Development Management Document (2014)

DMD6: Residential Character

DMD10: Distancing

DMD15: Specialist Housing Needs

DMD17: Protection of Community Facilities

DMD37: Achieving High Quality Design-Led Development

DMD38: Design Process DMD45: Parking Standards

DMD47: New Roads, Access and Servicing

DMD48: Transport Assessments

DMD49: Sustainable Design and Construction Statements

DMD50: Environmental Assessment Methods

DMD51: Energy Efficiency Standards

DMD53: Low and Zero Carbon Technology

DMD54: Allowable Solutions

DMD55: Use of Roof Space / Vertical Surfaces

DMD56: Heating and Cooling

DMD57: Responsible Sourcing of Materials

DMD58: Water Efficiency

DMD61: Managing Surface Water

DMD65: Air Quality

DMD66: Land contamination and instability

DMD68: Noise

DMD69: Light Pollution

DMD72: Open Space Provision DMD78: Nature Conservation DMD79: Ecological Enhancements

DMD80: Trees on Development sites DMD81: Landscaping

DMD83: Development Adjacent to the Green Belt

DMD Appendix 9 - Road classifications

8.13 Other material Policy documents

National Planning Practice Guidance

Community Infrastructure Levy Regulations 2010

LBE S106 SPD (Adopted 2016)

Enfield Local Plan (Reg 18) 2021

8.14 Enfield Local Plan - Reg 18 Preferred Approach was approved for consultation on 9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. It is Enfield's Emerging Local Plan.

8.15 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan. Little weight shall be afforded to the Draft Enfield Local plan (Reg 18), as per NPPF paragraph 48 however, where applicable draft policies shall be addressed.

9.0 Analysis:

- 9.1 The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise. Furthermore, paragraph 11 (c) of the National Planning Policy Framework (NPPF) goes on to state that development proposals that accord with the development plan should be approved without delay.
- 9.2 This report sets out the analysis of the issues that arise from the proposed development assessed against national, regional and adopted strategic and local planning policies.
- 9.3 The main considerations of the development are the following,
 - Principle of development
 - Development design and character
 - Care Home (C2) standard of accommodation
 - Impact on neighbouring amenity
 - Sustainable drainage and water infrastructure
 - Highway and transport implications
 - Landscaping & Biodiversity impacts
 - Sustainability and Climate Change
 - S106 contributions
 - Community infrastructure Levy
 - Other Matters

Principle of development:

Retention and enhancement of Care Home (C2)

9.4 The existing care home has been unoccupied for over two years and would be demolished as part of the development. In its place a new 95 bed care home will

- be constructed, continuing the existing C2 use on the subject site while increasing the sites operational capacity.
- 9.5 London Plan (2021) Policy H13 (Specialist older persons housing) expects Boroughs to work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of 1) local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in <u>Table 4.3</u> (provided below)

Table 4.3 - Annual borough benchmarks for specialist older persons housing 2017-2029

London Borough	Annual Benchmarks (units per annum
Barking & Dagenham	70
Barnet	275
Bexley	145
Brent	230
Bromley	210
Camden	105
City of London	10
Croydon	225
Coming	200
Enfield	195
Oreenwich	105
Hackney	40
Hammersmith & Fulham	70

- 2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport
- 3) the increasing need for accommodation suitable for people with dementia.
- 9.6 Para 4.13.13 of Policy H13 outlines the need and future demand, especially for Dementia suffers, confirming the total number of older people with dementia in London is forecast to rise from 73,825 in 2017 to 96,939 in 2029, an increase of 31 per cent.
- 9.7 Policy DMD15 (Specialists housing needs) of the Enfield Development Management Document expects "development is adaptable, well designed, of a high quality, accessible (internally and externally), meets the needs of the

specific client groups it serves and their carers but is flexible in case these change". In addition, "development would meet an identified borough need for that form of specialist housing having regard to evidence of need in the Council's Market Statement".

The redevelopment of the subject site will see the enhancement of the existing C2 use through the creation of a new care home specialising in providing nursing and residential care for a range of different needs, but predominantly providing care for frail, older people and those with age related dementia. This service will aid in meeting the current and future needs of the borough's ageing population. C2 care homes provide an important mix to the housing availability and act to free up housing for families and younger generations. The principal position of the Care home is supported by a planning statement submitted by the applicant (Dated January 2023) which states the community benefits the development will bring in relation to the retention of the C2 use on the site. The specialist nursing care provision for older people with dementia is consistent with the Council's most recent Market Position Statement (2019-2022) and thereby a designated need in the borough.

Heritage implications

9.8 The development site is not located in a Conservation Area and does not contain any Listed Building. However, the existing building is classified as a Non-Designated Heritage Asset as a rare example of Edwardian architecture within this section of The Ridgeway, it is for this reason that the proposal for the demolition has received an objection from heritage officers and the Victorian Society.

Arnold House as a non-designated heritage asset

9.9 The houses that characterise The Ridgeway vary greatly due to development since the 1960s. Historically it was 'an area long recognised as one of North London's most sought-after-residential locations'. During the C19 it was a semi-rural enclave for wealthy professionals and businessmen, with houses that were 'massive, individually designed Gothic Revival, Queen Anne Revival and Arts and Crafts-style mansions approached by carriage sweeps in plots of anything up to four acres'. Indeed, 'The Ridgeway represented the unattainable for most people; it was strictly the preserve of the upper middle classes and their servants'.

- 9.10 Arnold House is a rare survival of this. Despite the 1980s extension when a care home, the building still sits in its original plot. Matthew Eccleston's book, Enfield: Portrait of a Borough (Matthew Eccleston; 1996; London) writes that 'some of the mansions still stand. The Arnold House Cheshire Home set way back from the road amidst a nest of shrubbery and chestnut trees is a long, low, plastered vernacular-revival building, whose architecture is very reminiscent of Charles Voysey's New Tudor style'.
- 9.11 The house itself is perhaps not significant enough for designation by Historic England, but it is certainly of great local interest. Architecturally, it is an excellent example of a mansion on The Ridgeway in its original plot this is a rarity.

Assessment and planning balance

- 9.12 Paragraph 197 of the NPPF states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset'. In this instance, the necessary balancing act must be undertaken but considering the loss is of a non-designated heritage asset.
- 9.13 The development proposed will result in the total loss of the non-designated heritage asset. However, the resultant harm needs to be balanced against public benefits. In this instance the applicant has advised that the existing building is no longer fit for purpose and would need to be demolished to meet post pandemic health standards. Given it does not meet current standards it has stood vacant now for over 2 years and has increasingly been the subject of anti-social behaviour. The proposed development will deliver specialised housing accommodation and allow for an intensification of use of the site to meet a recognised housing need. The development will provide a modern standard of accommodation for future occupiers. It is considered that these benefits outweigh the harm to the non-designated heritage asset.

<u>Summary - Principle of development</u>

9.14 The site is a designated brownfield site with a substantive vacant building, as such, the site is prime land for re-development. The retention of the sites existing C2 use combined with the proposed expansion of services will provide an increase in specialist housing and will aid in addressing a key need of the

borough. While the development will see the demolition of a non-designated heritage asset, it is determined that the overall benefit the proposed development will bring outweighs the harm to the non-designated heritage asset. As such the development is therefore compliant with national, region and local planning policy and acceptable in principle for development.

Development design and character:

9.15 Policy D3 of the London Plan (2021) expects "all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity".

Design of Care Home

- 9.16 The design of the care home has undergone a series of changes through the application process with the LPA seeking parking and drainage rearrangements. The proposed buildings are substantially setback within the development site, minimising potential bulk impacts to adjoining properties and to the primary street. Open views to the development will be screened by existing established vegetation which is protected under a tree preservation order. The buildings placement in the centre of the site mirrors the existing footprint of the disused care home, this will aid in minimising the loss of vegetation while protecting significant trees on the site. The development has a ground floor covering approximately 1,371 sqm and will have a total height of four (4) storeys.
- 9.17 The proposed building features an articulated exterior design with numerous projections and insets across all elevations. This is combined with a wide range of external materials which together aid in breaking up the mass and bulk of the development creating a visually interesting design. The external materials are listed (below) and a full analysis is provided in the design and access documents supplied by the applicant to accompany the scheme.
 - A. Brown / Grey Multi Brick Exterior walls.
 - B. Pale Buff / Grey Brick Exterior walls.
 - C. Copper Metal Cladding Exterior walls, Corner cladding and Glazed metal panels.
 - D. Copper Metal Cladding Oriel Windows and Metal Blanking Panels.

- E. Green Walls Exterior Walls
- F. Aluminium windows finished in Copper Colour Bedroom windows and communal rooms, windows will be openable to allow for ventilation.
- G. 1.8m high glazing screens To southern elevation
- H. Planting Boxes To be added ground and third floor windows and inserts
- 9.18 Officers consider the Care home to be appropriately sited to the Ridgeway following the prevailing line of development established by the residential properties on the Ridgeway. The introduction of a four-storey building would not be out of place within the immediate context, as this section of the Ridgeway is home to multiple three and four storey buildings of similar scale and bulk. The proposed care home provides a high-quality development with on-site private gardens and appropriate locations for parking and drop-off access. The building succeeds in providing a visually attractive facility to the established urban area while still protecting much of the sites established vegetation in accordance with adopted design policies.
- 9.19 The development is spread across two linked primary buildings, both builds share the same design language creating a clear relationship across the development. The buildings will be accessed via an existing vehicle access route that runs along the southern side of the site from The Ridgeway and will be upgraded as part of the proposal. The northern access route from the Ridgeway will also be retained but will only provide pedestrian access to the site. The development will utilise both surface level and basement parking with disabled parking at surface level closest to main entrance of the facility. The on-site parking provision shall be elaborated further in the transport section of the report.
- 9.20 While a portion of the residential bedrooms are orientated north, most of the developments shared communal spaces are oriented to south and west ensuring that the spaces that will primarily be used by residents throughout the day receive sufficient sunlight year-round. This justification was confirmed via correspondence received from the developments architect supplied by the applicant to accompany the scheme. Concerns originally expressed from the urban design officer have been satisfied in relation to room orientation.

Impact on Green Belt

9.21 Policy DMD 83 of the Enfield Development Management Document seeks to assess development proposals against their impact on the Green Belt. The application site is not within the green belt but does border it on all sides except

- for the eastern boundary. The NPPF (2021) and London Plan (2021) do not contain policies that directly affect development sites adjacent to the Green Belt.
- 9.22 The proposed Care Home (C2) would have a greater impact than the current disused Care Home on the views and vistas when viewed from the Green Belt into the site. Officers note that the existing site is clearly evident from viewing points on the Ridgeway, including from the residential development adjacent from the site on Crofton Way. The massing and siting of the proposed development are set in from the boundaries to the west and south, thereby providing a clear separation distance from the delineated Green Belt boundary. The retention of significant trees / vegetation along the boundaries of the site will also aid in reducing the bulk and scale of the proposal within its immediate surroundings. In addition, the provision of two green walls will aid in mitigating bulk impacts by softening and breaking up the mass of the building's facades.
- 9.23 Officers have given consideration to the greater massing on the boundary of the Green Belt resulting from the proposed development. Nonetheless, overarching policy supports the development of such sites and the presence of a two-part four storey building is clearly read as a developed site opposed to an open or undeveloped plot.
- 9.24 The site is brownfield land and is appropriate and suitable for intensification of C2 use. Considering paragraph 11 (c) of the National Planning Policy Framework (NPPF) and the titled balance in favour of presumption of sustainable development, alongside the significant weight for the delivery of specialised housing meeting a recognised need, and there being no encroachment on the Green Belt, the impact of the development on the setting of the Green Belt is acceptable.

Design conclusion

9.25 The proposed development is of high-quality design and optimises the site providing an attractive setting for future occupiers of the care home (C2). Officers are comfortable and supportive of the schemes design and view the development to represent a sustainable development.

Care Home (C2) standard of accommodation

9.26 London Policy D6 sets out the London Plan criteria to ensure the delivery of new

housing of an adequate standard. Despite the adoption of the London Plan 2021, the Housing Supplementary Planning Guidance Document (2016) remains an adopted document and a material consideration in decision making. The DMD contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space), DMD10 (Distancing) and DMD15 (Specialist Housing needs)

Care Home (C2)

9.27 The proposed Care home is considered as use class C2 (Residential institution), providing residential nursing care (including dementia care), the important definition to make is such "residential use" is nursing and care focused, providing on site facilities and is importantly non-self-contained accommodation for people who by reason of age or illness have physical, sensory or mental impairment, including high levels of dementia. The London Plan Housing SPG provides clarification and guidance on the definition in Para 3.7.4 with core terms embolden below.

"Residential / nursing care (including end of life/ hospice care and dementia care); Nursing or residential care home providing non-self-contained residential accommodation for people who by reason of age or illness have physical, sensory or mental impairment, **including high levels of dementia**. Accommodation is **not self-contained**; meals and personal services are routinely provided to all residents. **Communal facilities are likely to include a dining room and residents lounge**. There will be a scheme manager and inhouse care team who provide a consistent presence. **Personal or nursing care is a critical part of the accommodation package**. Nursing homes include 24-hour medical care from a qualified nurse".

- 9.28 There are no set standards for C2 care home room and facilities in general, and no locally adopted policies to provide minimum standards. Notwithstanding the lack of dedicated standards, the nationally described floorspace standards, alongside the HAPPI guidance (Housing our ageing population) and minor elements of the national design code provide some overarching guide.
- 9.29 Notwithstanding the lack of detailed guidance for C2 accommodation, officers consider the level of accommodation to be high quality and provides a degree of shared communal areas including 7-day lounges, 7 quiet rooms, café / bistro, games room, tearoom, beauty salon, drawing room, cinema, study room, library

and landscape amenity area. The table below provides an overview of the numbers of each unit type and internal space. The internal areas for the residential bedroom are comparable to normal residential albeit with no kitchen areas. In addition, each bedroom has access to a private bathroom, private bathroom is of a uniformed size throughout the development.

Unit type	Number of units	Floorspace
Room Type 1	15	21.7 – 22.7m ²
Room Type 2	25	22.7 – 23.5m ²
Room Type 3	20	23.5 – 24.1m ²
Room Type 4	21	24.1 – 24.8 m²
Room Type 5	5	24.8 – 25.7 m ²
Room Type 6	9	25.7+

9.30 The quality of C2 accommodation is considered policy compliant meeting unadopted guidance for accommodation features and adopted Policies D6 (Housing quality and standards) and H13 (Specialist older person housing) of the London Plan (2021) and Policy DMD15 (Specialist Housing needs) of the Enfield DMD (2014).

Overlooking

9.31 Policy DMD 10 (Distancing) of the Development management Document provides guidance on the separation distances between building when considering new development. For clarify the separation distance table sought in policy DMD10 is provided below:

DMD 10

Distancing

 New development should maintain the following distances between buildings, unless it can be demonstrated that the proposed development would not result in housing with inadequate daylight/ sunlight or privacy for the proposed or surrounding development:

Table 2.2

	Number of storeys in facing buildings						
	1-1	1-2	1-3	2-2	2-3	3-3	
Minimum distance between rear facing windows (in metres)	22	22	25	22	25	30	
Minimum distance between windows and side boundaries	11m						

9.32 The proposed development achieves full subordination with provisions of DMD10 with the primary buildings having a side boundary setback of 15m to the southern boundary and 14m to the norther boundary respectfully. Thus, protecting the visual amenity and privacy of adjoining residential properties.

Accessibility Considerations:

- 9.34 The care home has been designed to adhere to the principles outlined in the Approved Document Part M of the Building Regulations. These guidelines provide a comprehensive framework for ensuring accessibility and inclusivity within the built environment to create a truly welcoming and accommodating space for individuals with disabilities.
- 9.35 To achieve compliance with the guidelines all entrances, pathways, and public areas are in full compliance with the document's standards for accessible design. This includes the installation of ramps with the appropriate gradients and handrails, as well as the utilisation of automated doors, ensuring that residents and visitors with disabilities can easily and independently access the facility. All residential rooms and shared communal spaces have been designed to meet full compliance with Part M of the Building Regulations. With all spaces and internal dimensions designed to provide ample space for manoeuvrability and accessibility. Compliance with relevant provisions of the Building Regulations has been confirmed by the developments architect.

Impact on neighbouring amenity:

- 9.36 London Plan Policy D6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Meanwhile Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Lastly Enfield Policies 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.
- 9.37 The location of the site results in limited impact to neighbour properties, primarily on account of the open nature to the Green Belt on the eastern boundary and the substantial side and font setbacks to the southern, northern, and eastern boundaries. Combined with the high level of vegetation remaining on the development site which will aid in reducing bulk and scale impacts of the proposed buildings.
- 9.38 The development site is located adjacent to the Green Belt with the proposed development to be built over the existing building footprint and in line with the existing line of development present along the Ridgeway. Therefore, there are no disparities between the sitting of the buildings in relation to the built form of the area.
- 9.39 The optimisation of the site would not result in any material difference to the existing level of outlook and privacy to the associated adjoining properties. The impact on neighbouring amenity levels as a result of the development is not considered to have any unreasonable impacts to direct amenity conditions of existing occupiers of the adjoining residential properties.

Affordable Housing Provisions:

- 9.40 Policy H13 of the London Plan (2021) outlines that development proposals must provide affordable housing in accordance with Policy H4 Delivering affordable housing, and Policy H5. However, these provisions do not apply to the development proposal as the development is classified as 'care home accommodation' under Policy H13 and is not subject to affordable housing requirements.
- 9.41 Under Policy H13 of the London Plan (2021) for a development to be classified as 'care home accommodation' it must comply with the following:

- Personal care and accommodation are provided together as a package with no clear separation between the two.
- The person using the service cannot choose to receive personal care from another provider.
- People using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold.
- Likely CQC-regulated activity72 will be 'accommodation for persons who require nursing or personal care'.
- 9.42 As the proposal satisfies the requirements outlined within Policy H13 of the London Plan (2021) for 'care home accommodation' there is no statutory requirement to provide affordable housing within the scheme.
- 9.43 The proposal does not contain any affordable housing elements; this was found to be acceptable as the development itself is not considered to be housing under the provisions of the London Plan and is classified as care home accommodation (use class C2).

Impact on Sustainable Drainage:

- 9.44 Policy SI 12 of the London Plan (2021) outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield runoff rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 DMD63.
- 9.45 The applicant has submitted a Drainage Strategy Report and Flood Risk Assessment (July 2022) (Prepared by Intermodal Transportation) to justify the development against drainage policies. The sustainable drainage officer has reviewed the details provided and is satisfied that the proposal meets all relevant policy expectations.
- 9.46 Thames Water have been consulted and confirmed no objections subject to preoccupation connections to the foul water sewerage network are provided to Thames water and are compliant with legislation.

Highway and transport implications:

- 9.47 London Plan (2021) Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards. Policies T6 and T6.1 to T6.5 set out car parking standards.
- 9.48 The site is served and benefits from two separate two-way access points to the Ridgeway located at northeast and southeast of the development site facilitating the use of the care home (now vacant). The southeast access point shall remain and serve as the primary vehicle access point to the facility. The existing northeast access point will not serve vehicle traffic but will facilitate pedestrian and cycle movements to and from the site. Paragraphs 2.2 and 2.3 of the submitted Transport Assessment (August 2022) confirms the existing site access would be improved with a formalised 2m wide footways and 6m radii on both sides. The secondary access for pedestrians would be 2m wide, which would be wide enough for wheelchair users.
- 9.49 Policy DMD 47 requires new access and new roads to be properly sited and suitable for pedestrians and cyclists. Serving configuration should have no impact on highway safety and the free flow of traffic. Policy DMD 47 states,
 - "New development will only be permitted if the access and road junction which serves the development is appropriately sited and is of an appropriate scale and configuration and there is no adverse impact on highway safety and the free flow of traffic".
- 9.50 The internal access roads within the development are well-designed and laid out to benefit free vehicular movement and reduce potential safety issues. The pedestrian paths would be 2m wide and the road 6m allowing two-way access. The retention of the existing access for the new Care home (C2) compiles with adopted policy.
- 9.51 The following highway and transport documents Transport Assessment (May 2022), Travel Plan Framework (May 2023) and Transport Assessment Addendum (May 2023) are submitted to support the planning application, including but not limited to provision of a full analysis of the development including projected travel trip data and travel behaviour. These documents have been supplied by the applicant to accompany the scheme.

9.52 During the assessment process the development plans have been amended to address concerns from transport officers who originally objected to the proposal. In response to this objection the applicant provided amended plans which include a parking increase of ten parking spaces at surface level, as well as an increase in secure cycle storage as well as providing greater detail relating to the development which can be found in the Transport Assessment Addendum and Travel Plan Framework within the proposed scheme. The transport officer has assessed the submitted information and has no objections to the schemes impact on the highway safety or capacity.

Vehicle Parking & Cycle provision

- 9.53 Policy T6 of the London Plan (2021) states "car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy. The policy goes on to state "an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets".
- 9.54 The site is located within a 1b PTAL level in an outer London designation and therefore car free would not be appropriate here. The London Plan does not include parking standards for care homes, therefore the level of parking for this type of development needs to be determined on a case-for-case basis taking account of the public transport, walking and cycling connectivity of the site.

Care Home (C2) parking provision

- 9.55 The proposed care home scheme would have a total of some 41 car parking spaces provided, consisting of 17 surface level parking spaces (including two disabled bays) and 24 basement parking spaces. The travel plan framework statement states that due to the nature of the care home operation with the majority of the residents expected to be over the age of 80 years old, the parking provision would therefore generally serve staff and visitors only. The LPA agrees the parking demand from the Care home occupants would be modest.
- 9.56 Further to the above, the site is 1km from Gordon Hill railway station on Lavender Hill with service into Moorgate with trains typically every 30 minutes and regular Bus services. The mix of transport options warrants merit regarding the sites

- parking previsions. The development would be subject to parking management conditions.
- 9.57 Electric vehicle charging points are to be provided to 8 parking spaces (20%) within the development with the remainder of the spaces have provisions to allow for future expansion. This will be controlled by condition.
- 9.58 The transport officer has assessed the scheme and considers the parking provision to be satisfactory and acceptable.

Residential Cycle storage

- 9.59 Secure cycle parking is provided to the side gardens of the development via the north-eastern accessway. A total of 40 protected cycle stores for staff and 5 Sheffield Standards (cycling parking) available for visitors at surface level. The quantity of on-site cycle storage is policy complaint. All the cycle spaces would be secure and covered but subject to a pre-occupation condition finalising the final appearance of the secure units.
- 9.60 The transport impacts of the development would not result in safety concerns or increase parking demand in the location in accordance with adopted planning policies in the London Plan (2021) and the Enfield Development Management Document (2014).

Refuse Management on site

- 9.61 Secure, appropriately sized refuse and recycling stores are provided for the communal use of the care home facility and are located at the south of the development site. The location is easily accessible by staff while still maintaining a clear separation from the residents.
- 9.62 Due to the proposed nature of the buildings and the type (in particular clinical waste) and quantity of the waste it will generate, the Council's general refuse collection arrangements will not apply. Instead, waste and refuse will be managed and collected by a private refuse contractor, who will carry out routine and regular collections.
- 9.63 The applicant has submitted a Design and Access Statement alongside a Site Waste Management plan confirming the method of collection. The management

of the waste collection is considered to be satisfactory and meets policy expectations.

Impact on Landscaping, Trees & Biodiversity:

Landscape quality

- 9.64 Policy G5 outlines that major development proposals should contribute to the greening of London by including urban greening by incorporating measures such as high-quality landscaping, green roofs, green walls and nature based sustainable drainage.
- 9.65 The applicant has submitted the following documents pertaining to landscape and broader greening of the site.

Outline Landscape Proposal (PR235-01)
Detailed Planting Proposal (PR235-02)
Planning Statement
Ecological Appraisal
Arboricultural Impact Assessment Report

Trees

- 9.66 London Plan Policy G7 states that where development proposals result in the removal of trees, adequate replacement trees should be planted based on the existing value of the trees to be removed.
- 9.67 Chapter 12 para 131 of the NPPF adds weight to the need for trees to be provided in visually enhancing locations such as streets. Para 131 states,
 - "Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should **ensure that new streets are tree-lined**, that opportunities are taken to incorporate trees elsewhere in developments..."
- 9.68 The redevelopment of the care home will result in the loss of 52 existing tress across the development site. Most of the trees to be removed are within the internal part of the site and are less important as individual trees than those being retained. Their existing value is general cover, habitat and a sense of visual enclosure. The trees to be removed include:

6 B category31 C category15 U category trees.

- 9.69 While the loss of trees is regrettable, most are of lower value and removed internally from the site. The siting of the proposed buildings will have a compatible relationship with retained trees and presents no significant post-development pressure. All category A trees are to be retained.
- 9.70 All of the important mature trees on and adjacent to the north and south boundaries would be retained. On the east boundary fronting The Ridgeway, five mature trees (and two semi-mature trees) are shown to be retained. Two mature trees would be removed: T28 Horse Chestnut and T40 Turky Oak. T28 has limited longevity due to its condition and should not be constraint to the development. The arboricultural report identified defects for T40 Turkey Oak (Category B tree) and recommended an urgent investigation to determine the significance of the defects. The findings of this investigation are not contained within the application documents and therefore the implication of the defects and the longevity of this tree is not known.
- 8.71 The LPAs tree officer has noted that the location of retained trees on the east boundary shown on the landscape plans differs from the tree survey plan.

 Amended plans should be conditioned to accurately reflect the development site tree provisions prior to development commencement.
- 9.72 The successful delivery of the protection of retained trees will be dependent upon the design of hard surfacing and ground levels in the Root Protection of retained protected trees. To achieve this a planning condition relating to the design of the hard surfacing, levels, and drainage to be designed to meet the requirements of the retained protected trees. There should be no excavation within their RPA to implement hard surfacing and finishes levels.
- 9.73 The proposal will see the introduction of 12 new trees within the development site. Landscaping documents provided as part of the scheme outline in detail planting and after care measurements that will take place to ensure the longevity of the proposed trees and associated landscaping across the development site. The proposed trees will be located throughout the site, including along the proposed internal street and surface carpark in line with chapter 12 of the NPPF. Proposed tree planting is appropriate for the location and available space and will contribute to the long-term character of the site and setting. Manicured

landscaping around the proposed development will be utilised as outdoor amenity space at the enjoyment of residents / visitors. Trees have been accommodated whilst ensuring that amenity space remains usable and accessible for future residents.

- 9.74 The optimisation of the site, while resulting in a reduction of existing trees on site will, provide the broader community with an increase of specialist housing and will aid in addressing a key need of the borough. As such it is deemed that the benefits the development will bring justifies the overall reduction of trees within the development site, However, in order to mitigate the overall tree loss proposed and given there is limited capacity to accommodate further tree planting on site, a contribution towards, or direct provision of, the planting of 40 trees off site will be secured through a legal agreement.
- 9.75 The LPAs tree officer has assessed the submitted development application (Dated 23 February 2023) and has no objection to the scheme on the provision that the proposed removal of existing trees within the development site and the protection of retained trees on site during construction should be secured and be overseen by the project arboriculturist.

Ecology impacts

- 9.76 Policy G6 of the London plan (2021) states "development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process". The applicant has submitted a revised Ecological Appraisal during the planning application dated October 21 which has subsequently been assessed internally against policy.
- 9.77 The site is not subject to any statutory or non-statutory ecological designations. There are no statutory designated sites within 5km. The nearest statutory site is Chingford Reservoirs SSSI, which is approximately 5.5km to the east. The development site lies within a SSSI Impact Risk Zone, however the proposals do not fall within one of the categories identified as potentially posing a risk to the SSSI. The site comprises of a two-storey building and number of smaller one storey extensions that protrude from the primary structure which is surrounded by areas of hardstanding, amenity grassland, ornamental planning, and associated landscaping. Overall, the preliminary ecology survey provides an adequate overview of ecology on site and the on-site habitats are not a constraint to development.

- 9.78 A certified bat survey of the development site was undertaken in conjunction with the ecology report and confirms that no bats were reported roosting in the primary building however it notes that site is a suitable location for such habitat.
- 9.79 To address the loss of potential bat habitat the applicant is proposing the provision of bat boxes within the development providing high quality nesting habitat. The bat boxes will consist of a combination of two standalone structures and three integrated boxes that form part of the building's façade.
- 9.80 The landscaping plan (Outline Landscape Proposals, Job no: PR-235-01 dated May 2021) shows the location of bird and bat boxes. The bat and bird boxes will consist of a combination of standalone and integrated designs that will be located throughout the site to maximise potential habitat opportunities.
- 9.81 The existing site is of limited ecological value. Nevertheless, the details and strategies submitted in the ecology report and securing conditions, pertaining to the Natural England licence and robust landscaping scheme, the proposals appropriately mitigate for the loss of foraging habitat and would provide a good quality of ecology and biodiversity enhancements in accordance planning policy.

Energy & Carbon emissions:

- 9.82 Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan (2021) expects major development to be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
 - 1) be lean: use less energy and manage demand during operation
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance.
- 9.83 Policy SI 7 (Reducing waste and supporting the circular economy) of the London Plan (2021) seeks the adoption of circular economy principles for referable applications. This means creating a built environment where buildings are designed for adaptation, reconstruction and deconstruction. This is to extend the useful life of buildings and allow for the salvage of components and materials for reuse or recycling. Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
- 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and reused at the end of their useful life
- 3) opportunities for managing as much waste as possible on site
- 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
- 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- 6) how performance will be monitored and reported.
- 9.84 Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
 - 1) through a cash in lieu contribution to the borough's carbon offset fund, or
 - 2) off-site provided that an alternative proposal is identified, and delivery is certain
- 9.85 The applicant has submitted the following reports to satisfy policy requirements.
 - Energy Strategy (Dated June 2022)
 - Construction Environmental Management (Dated June 2022)
- 9.86 As stated in the Energy Strategy supplied by the applicant, the proposed energy efficiency measures for the scheme would achieve a 15.1% annual carbon reduction in line with the 15% minimum target set by the London Plan 2021.
- 9.87 The climate change officer has commented on the application. An objection has been raised to the proposal was received on the grounds of demolition of the existing building rather than retention. However, the existing building is no longer fit for purpose and would not meet current care standards. To deliver a facility that meets the relevant standards and optimises the use of the site, allowing for an increase in care accommodation, the existing building is to be demolished. To ensure that waste generated through the demolition process is recycled where

- possible a condition is recommended requiring the submission of a Circular Economy Statement prior to the commencement of development.
- 9.88 The proposed scheme would include the provision of air to water heat pumps which would provide space heating and comfort cooling and with photovoltaic panels at roof level to generate electricity for the site. As stated within the Energy Strategy supplied by the applicant, these measures are estimated to reduce the annual carbon dioxide emissions of the site by 55,900 kgCO2, which equates to a reduction of 48.3% against the TER 2021. Combined with the energy efficient measures (15.1%) would equate to a reduction of 68.4% against the TER 2021 for the scheme. The proposed reductions align with the sustainable energy targets of the London Plan (2021).
- 9.89 Applicant meets overall a minimum of 63% improvement against Part L 2021 and would be subject to a cash in lieu contribution of £121,186, reflective of the 42.5 tonnes of CO2 below Carbon zero at a rate of £95 per CO2 tonnage. The contribution shall be paid by the development upon commencement and included and secured via the s106 legal agreement.

Other material matters:

Socio-Economics

- 9.90 London Plan Policy CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end use phases.
- 9.91 The proposed care home shall provide approximately 100 new jobs in a range of roles, with staggered and flexible shifts on both a full-time and part-time basis.
- 9.92 Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies. 10.3 To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that s106 planning obligations secure the following:

- Local Labour (during demolition and construction phases):
- Employment & Skills Strategy submitted and approved prior to commencement
- All reasonable endeavours to secure 25% of workforce
- Apprenticeships or trainees
- o Local goods and materials

Employment & training:

- Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets.
- o Training opportunities
- o Partnership working with local providers/programmes

Health Impact Assessment

- 9.93 London Plan Policy GC3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to an outlined criterion.
- 9.94 This application is accompanied by a Health Impact Assessment. The assessment outlines health profile baselines which have informed impacts of the proposed development. Overall, the assessment concludes that the proposed development will generally have a positive impact on the health of the future and local residents.

Security

- 9.95 Final details of the appearance and form of the gate detail and access arrangement to the site shall form a planning condition. The MET police have reviewed the development and have sought planning conditions. Officers consider the layout of residential development to provide high levels of passive surveillance. A secure by design condition in accordance with the Met Police recommendation is included in the list of conditions above
- 10.0 Section 106 Agreements & Planning Obligations

10.1 The planning application is subject to financial contributions and other obligations secured via s106 legal agreement with the following heads of terms.

Employment and Training

- 10.2 a. Local Labour (during construction phase)
 - b. Employment & Skills Strategy submitted and approved prior to commencement of development (definition of development in this instance not including demolition) using reasonable endeavours to secure: (i). 25% of local workforce, (ii). 1 x apprentice or trainee for every £1m contract value (figure to be agreed during drafting of s106 subject to formula) (financial contribution to be provided if exceptional circumstance exist), (iii). Quarterly apprenticeship reporting & targets, (iv). Local goods and materials, and (v). partnership working with local providers/ programmes

Carbon Offset

10.3 A Contribution (Carbon Offset Payment) towards the Carbon Offset Fund (utilised by LB Enfield towards the provision of measures for securing CO2 reduction in the vicinity of the Site) of £121,186 shall be secured.

Tree Planting

10.4 Contribution towards or the direct provision of planting of 40 trees off site to help mitigate the proposed reduction of trees caused by the proposal on the development site. Details regarding level of contribution and location of tree planting to be agreed

Other

- 10.5 a. Considerate Constructors Scheme.
 - b. LBE Management monitoring fee (maximum 5% of value of financial contributions).
 - c. Section 278 to be entered by the applicant for the reinstatement and improvement works to the existing access crossover and provision of extended new crossover.

11.0 Community Infrastructure Levy (CIL)

Mayoral CIL

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

Enfield CIL

- 11.2 The existing Arnold House (Care Home) building has a total floorspace of 1,371m². The proposed C2 Care Home would have a total floorspace of 5,810m²
- 11.3 The Enfield Community Infrastructure Levy Charging schedule (adopted April 2016) seeks contributions of £0 per m² on C2 uses. The MCIL2 Charging schedule does not make exception and the total C2 floorspace would be subject to London Mayoral CIL.

C2 Care Home

The net new C2 floorspace $(5.810\text{m}^2 - 1.371\text{m}^2)$ of 4.439m^2 would be subject to London Mayoral rate of £60, therefore £60 x 4.439 = £266.340

All figures above are subject to the BCIS figure for CIL liable developments at time of CIL processing.

12.0 Public Sector Equality Duty

12.1 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. The applicant has confirmed that the proposal will be designed to adhere to the principles outlined in Approved Document Part M of the Building Regulations.

13.0 Conclusion

13.1 The development will result in the loss of a non- designated heritage asset. However, it is consider that the harm arising from this is out -weighed by the public benefits associated with the provision of increased care capacity on the site, meeting a strategic borough need. The development is a sustainable brownfield site with a vacant care home with existing access and is appropriate for intensification of development in accordance with strategic expectations and the social need in the borough alongside the increase in specialist occupation with on-site care. The design, sitting, massing, standard of accommodation and

impact on neighbouring amenity are all considered acceptable to NPPF (2021) adopted London plan (2021),) and Local Enfield planning policy within the Core Strategy (2010) and Development Management Document (2014).











WEST ELEVATION

1:100 L L L J Gm 1m 3m 6m

ARNOLD HOUSE
PROPOSED SOUTH ELEVATION
ARNOLD HOUSE
THE RIDGEWAY
ENFIELD
GERAS ESTATES LIMITED
17.01.2023 1:100@A1 PROJECT 1663

EAST ELEVATION

GERAS ESTATES LIMITED

13.06.2022 1:100@A1 PROJECT 1663





1:100 L L L J Om 1m 3m 6r

Private Bathroom

ARNOLD HOUSE
FIRST FLOOR PLAN
66, THE RIDGEWAY
ENFIELD
EN2 8JA
GERAS ESTATES LTD.
20.06.2022 1:100@A1 PROJECT 1663

3 16 00





1:100 L L L L L M Gm 1m 3m 6m



ARNOLD HOUSE
SECOND FLOOR PLAN
66, THE RIDGEWAY
ENFIELD
EN2 8JA
GERAS ESTATES LTD.
20.06.2022 1:100@A1 PROJECT 1663

1:100 L L L J Gm 1m 3m 6m

Private Bathroom

25.7+sqm



ARNOLD HOUSE
THIRD FLOOR PLAN
66, THE RIDGEWAY
ENFIELD
EN2 8JA
GERAS ESTATES LTD.
20.06.2022 1:100@A1 PROJECT 1663

318.0

Private Bathroom



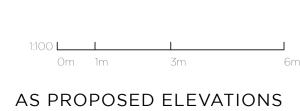
RIDGEWAY ELEVATION (EAST)

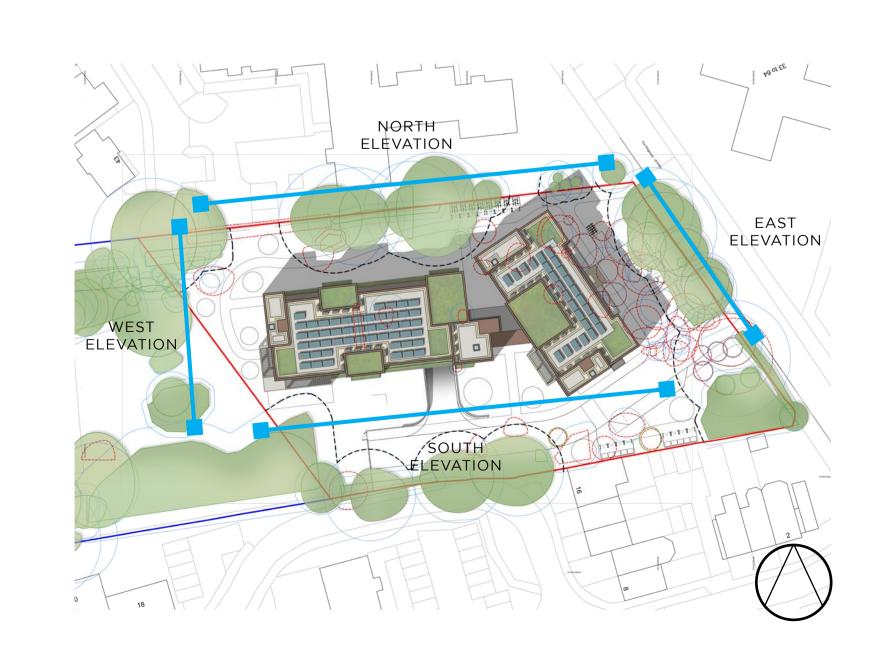


NORTH ELEVATION



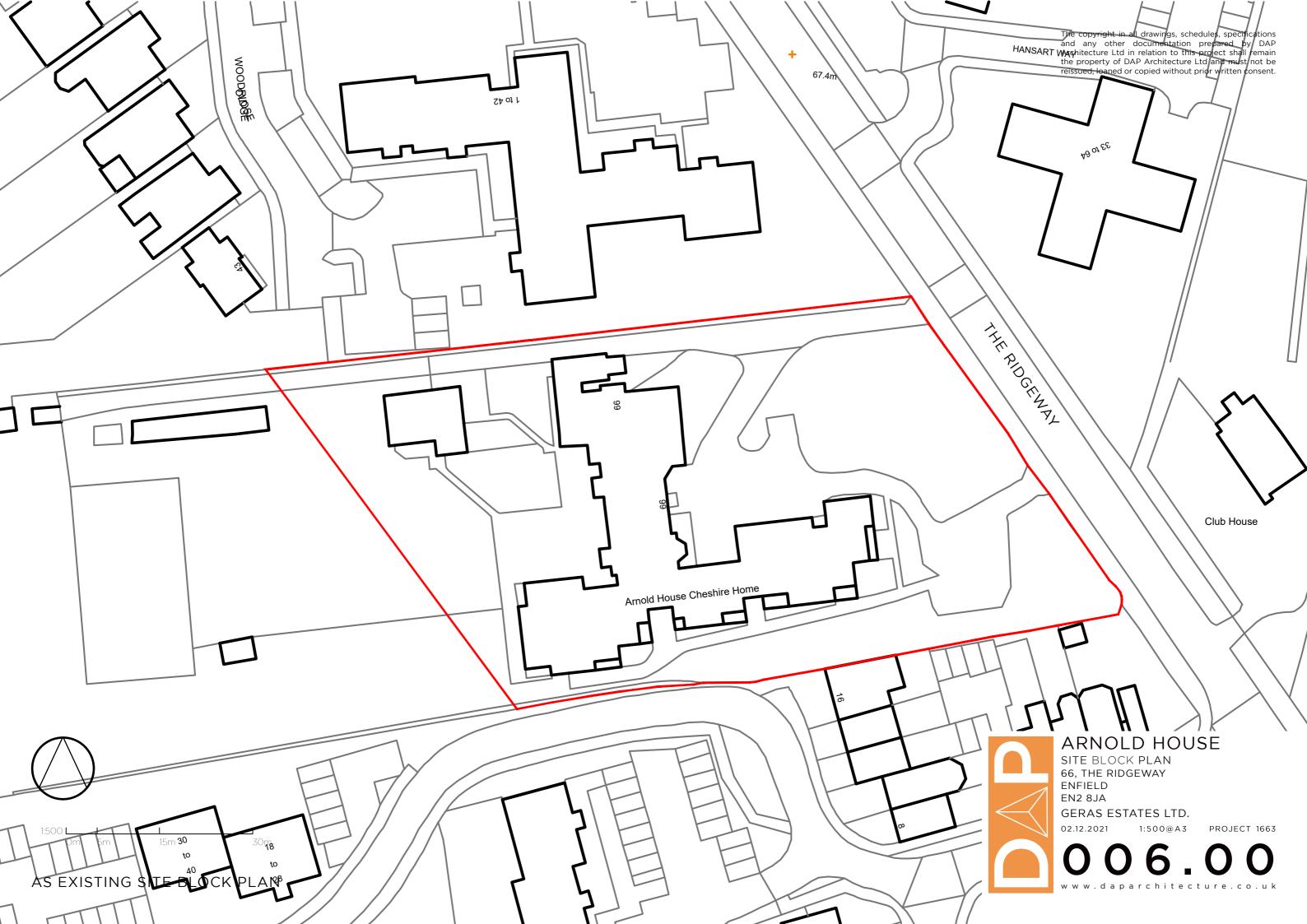
WEST ELEVATION



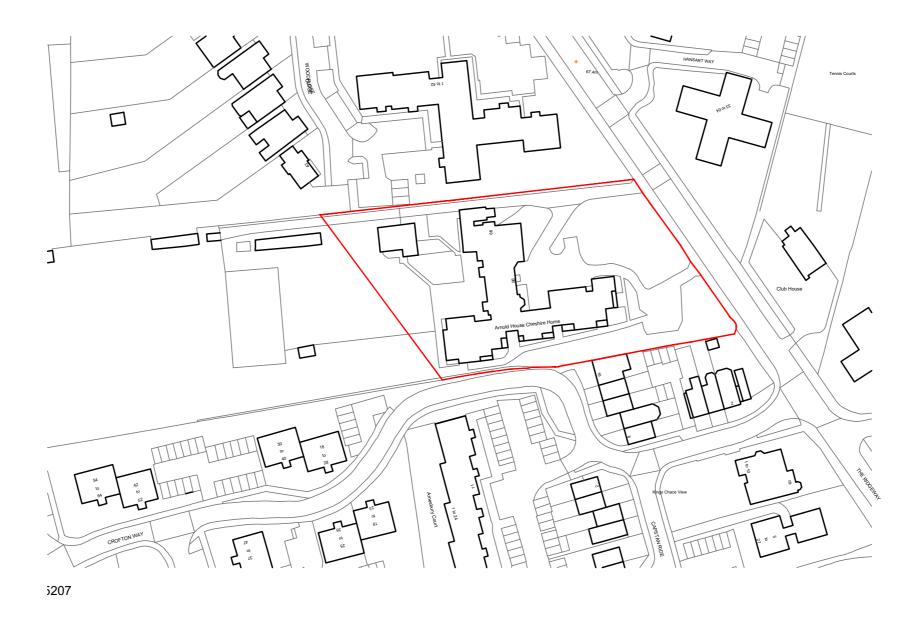


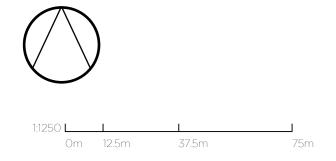






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AF SITE 66, ENF EN2 GEF 02.12

ARNOLD HOUSE SITE LOCATION PLAN 66, THE RIDGEWAY ENFIELD EN2 8JA GERAS ESTATES LTD.

02.12.2021

1:1250@A3 PROJECT 1663

005.00



TOPOGRAPHICAL & MEASURED BUILDING SURVEYS ABBREVIATIONS & SYMBOLS RSD Roller Shutter Door

> FBD Floor Board Direction SP Arch Spring Point Height FH Fire Hydrant SY Cable Stay Tac Tactile Paving TC Telecom Cover
> TH Trial Pit GG Gully Grate GV Gas Valve THL Threshold Level HH Head Height B/W Barbed Wire Fence IC Inspection Cover TL Traffic Light ToW Top of Wall TP Telegraph Pole TS Traffic Signal Cover LP Lamp Post TV Cable TV Cover UB Universal Beam UC Unknown Cover Col Column NB Name Board UK Unknown Tree C/P Chestnut Paling Fence OHL Overhead Line (approx) UMG Unmade Ground CR Cable Riser Pan Panel Fence USB Under Side Beam
> C/W Chicken Wire PB Post Box UTL Unable To Lift DC Drainage Channel PM Parking Meter UTS Unable To Survey
> DH Door Head Height PO Post VP Vent Pipe
> Dil. Dilapidated P/R Post & Rail Fence WB Waste Bin P/W Post & Wire Fence WH Weep Hole

F/C Floor to False Ceiling Ht Survey Control Station

All building names, descriptions, number of storeys, construction type including roof line details are indicative only and taken externally from ground level.

WM Water Meter

Floor to Ceiling Height

Detail, services and features may not have been surveyed if obstructed or not reasonably visible at the time of the survey. Surveyed physical features may not necessarily represent the legal boundary

Measurements to internal walls are taken to the wall finishes at approx 1m above the floor level and the wall assumed to be vertical.

Cill heights are measured as floor to the cill and head heights are measured from cill to the top of window. The contractor must check and verify all site and building dimensions, levels,

The accuracy of the digital data is the same as the plotting scale implies. All dimensions are in metres unless otherwise stated. The survey control listed is only to be used for topographical surveys at the stated scale. All control must be checked and verified prior to use. © Land Survey Solutions Limited holds the copyright to all the information contained within this document and their written consent must be obtained before copying or using the data other than for the purpose it was originally

 EASTINGS
 NORTHINGS
 LEVEL

 531421.382
 197456.361
 68.078

 531410.787
 197472.257
 67.978

 531396.399
 197493.366
 67.817

 531377.095
 197519.834
 67.683

 531337.315
 197513.244
 67.044

 531315.590
 197495.383
 67.113

 531307.590
 197484.715
 67.328

 531311.279
 197461.421
 67.417

 531325.738
 197461.287
 67.411

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 197464.696
 67.365

 531351.889
 197468.713
 67.407

 531381.057
 197476.427
 67.831

 531373.749
 197495.767
 67.368

 531273.716
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 66.141

 531240.214
 197501.412
 64.781

 531253.599
 197482.490
 63.728

 531296.638
 197478.343
 66.339

SURVEY GRID AND LEVEL DATUM The coordinate system established for this survey is related to Ordnance Survey (OS) national grid at a single point using Smartnet, then orientated to grid north with a scale factor of 1.000.

The level datum established for this survey is related to Ordnance Survey (OS) using GPS Smartnet. To avoid discrepancies any coordinated data used in conjunction with this survey must be derived directly from this control data.



survey-solutions.co.uk

TOPOGRAPHICAL SURVEY

SURVEYOR SURVEY DATE CHECKED BY APPROVED BY DWG STATUS BTC FINAL REVISION ISSUE DATE





