

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 23 April 2024

Report of:
Head of Planning & Building
Control : Karen Page

Contact Officer:
Karolina Grebowiec-Hall
Eloise Kiernan

Ward: Palmers
Green

Application Number: 23/01848/FUL

Category: Major

LOCATION: Vacant TfL Highways Land Formally Comprising No's 108-112 Palmerston Crescent, London, N13 4NG

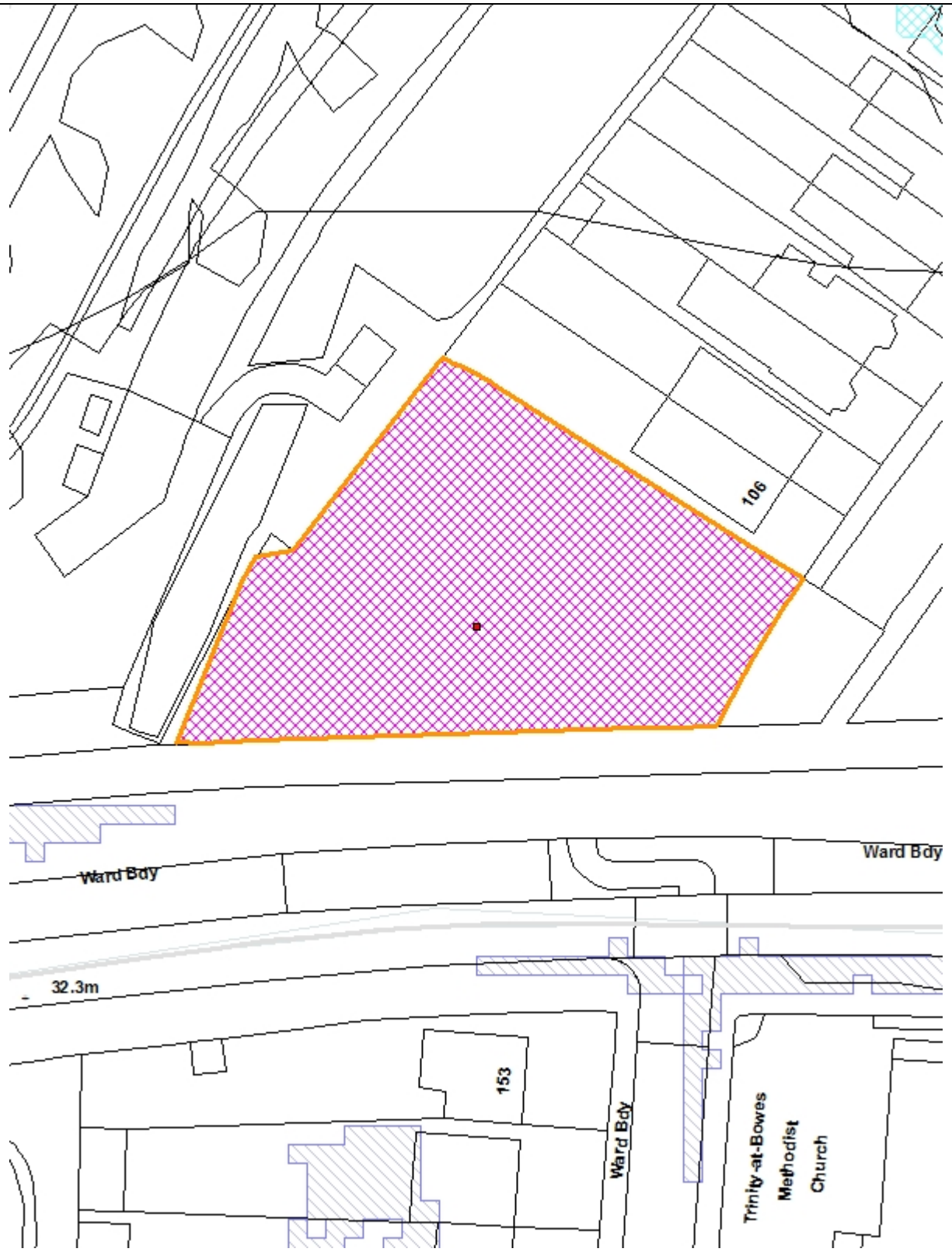
PROPOSAL: Construction of two buildings ranging from 3-6 storeys in height (with part-basement) to provide 31 residential units, including new vehicular access from Palmerston Crescent, car/cycle parking, landscaping and other associated works.

Applicant Name & Address:
C/O Crossier Properties Ltd
Wellington and Co Ltd
Abbot's Place
London
NW6 4NP

Agent Name & Address:
Mr Tim Waters
Renew Planning Ltd
Work Life Hammersmith
174 Hammersmith Road
London
W6 7JP

RECOMMENDATION:

- 1 That subject to the completion of a S106 to secure the matters covered in this report, the Head of Planning and Building Control be authorised to GRANT planning permission subject to conditions.
- 2 That Head of Planning & Building Control be granted delegated authority to finalise the wording of the S106 Agreement and the planning conditions listed below.



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

Scale 1:1250

North



1. NOTE FOR MEMBERS

- 1.1** The application is reported to the Planning Committee for determination as it is a major development, involving more than 10 residential units in accordance with the scheme of delegation.

2. EXECUTIVE SUMMARY

- 2.1** The report seeks approval for the redevelopment of the site incorporating the construction of two buildings ranging from 3-6 storeys in height (with part-basement) to provide 31 residential units, including new vehicular access from Palmerston Crescent, car/cycle parking, landscaping, and other associated works.
- 2.2** The site falls within the boundaries of the Council's adopted North Circular Area Action Plan (NCAAP 2014), which establishes the principle of redeveloping sites along the North Circular. This site is not specifically identified, however would be termed as a "windfall" site.
- 2.3** The delivery of housing on underutilised brownfield sites in sustainable locations (close proximity to overground/underground, bus station) and within close proximity to a designated district and local centre has strong planning policy support and should be afforded substantial weight in the determination of the application.
- 2.4** Developing existing brownfield land protects the Borough's greenfield and greenbelt land, thus preserving this important characteristic of Enfield – and is supported at all planning policy levels, nationally, London-wide and within Enfield's adopted development plan policies.
- 2.5** The proposal would support London Plan policies, which seek to increase housing supply and optimise site capacity. The site is assessed to be a sustainable location suitable for delivery of new high-quality housing – which is supported in principle. The introduction of residential accommodation is supported in strategic and placemaking terms.
- 2.6** The proposed development includes 31 new residential units with a breakdown of 14 (1-bed (45%)), 11 (2-bed (36%)) and 6 (3-bed (19%)). Additionally, the scheme would provide 50% affordable housing by habitable room (44 habitable rooms of the proposed 88 habitable rooms) with a breakdown of 71% social rent and 29% intermediate rent. The overall tenure mix consists of 17 x market dwellings and 14 x affordable dwellings (comprising in turn of 11 x affordable rent and 3 x intermediate units). This would contribute high quality housing stock to the Borough to meet housing need – which continues to rise in the Borough. The scheme would also provide opportunities to improve the landscaping and biodiversity at the site given the adjacent environmental designations, which is an intention outlined within the North Circular Area Action Plan.
- 2.7** There is a pressing need for housing, including affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. Officers consider that the proposed development would deliver a high

quality residential-led development on existing brownfield land – in a sustainable location. The site has a PTAL of 3 (6b being the best). The proposal would make a meaningful contribution towards Borough and wider London housing needs – helping Enfield to support its growing population.

3. RECOMMENDATION

3.1 That subject to the completion of a Section 106 agreement, the Head of Planning & Building Control be authorised to GRANT planning permission subject to conditions as set out below.

3.2 That Head of Planning & Building Control be granted delegated authority to finalise the wording of the S106 Agreement and the planning conditions listed below.

3.3 Conditions

1. Time limit – 3 years
2. Approved plans
3. Materials – drawings, samples and sample panels including hardsurfacing
4. Boundary Treatment/s including acoustic fencing and terraces
5. Playspace Design
6. Landscaping – details and management plan
7. Biodiversity enhancements
8. Details of levels
9. Details of green roof
10. Secured by Design
11. Inclusive Design - M4(2) and M4(3) - include percentage 90% and 10%
12. Sustainable Drainage Strategy
13. Sustainable Drainage Strategy - Verification Report
14. Lighting Details / Plan (Building & Public Realm)
15. Site Waste Management Plan
16. Non-Road Mobile Machinery (NRMM)
17. Contamination – Desk Study, Remediation Strategy and Verification Report
18. Foundation Works Risk Assessment
19. Noise Mitigation Measures – sound insulation (future occupants)
20. Acoustic Report
21. No Piling – Thames Water
22. Disabled Parking
23. Details of Cycle Parking
24. Details of Refuse Storage
25. Construction Management Plan-dust and highways (CLMP)
26. Delivery and Servicing Plan
27. Arboricultural Method Statement with Tree Protection Plan (non-standard wording)
28. Energy Statement – management and maintenance
29. BREEAM – Excellent
30. Potable Water
31. Green Procurement Plan – details for how the procurement of materials for development will promote sustainability
32. Details of any Rooftop Plant, Extract Ducts and Fans incl. Plant Ac. Report
33. Details of any rooftop plant, extract ducts and fans (appearance)
34. Fire evacuation lift (details / management)
35. Electric vehicles

36. PD restriction on satellite equipment
37. No plant equipment to be fixed to external face of building
- 38 Obscured glazing – north elevations

4. SITE AND SURROUNDINGS

- 4.1 The application site lies to the northern side of the North Circular Road / A406 (Bowes Road) and to the SW end of Palmerston Crescent, which is residential cul-de-sac road, in the borough ward of Palmers Green. The plot is currently vacant and contains some trees with modest to high amenity value and it acts as a grass verge buffer between Palmerston Crescent and the North Circular Road. The site is irregular in shape and approximately 0.16 hectares.
- 4.2 The New River lies a short distance to the west and just beyond it is a railway line which splits the area from the more densely built areas to the west. This area around the river and railway, and adjacent to the development site, is designated a Wildlife Corridor, Site of Borough Importance for Nature Conservation and Site of Metropolitan Importance for Nature Conservation.
- 4.3 The Pymmes Brook is further afield at approx.125m to the north and it has similar nature conservation designations. The riverbanks of both rivers are also designated Green Chain Corridors and Local Open Space.
- 4.4 A public footpath which allows pedestrian access from Palmerston Crescent to the North Circular Road is directly adjacent to the east and further to the east approx. 270m away, at the busy road junction area of Bowes Road and Green Lanes, is the Green Lanes Local Centre. In between the Local Centre and the site there is a large strip of grass verge to the rear of properties on the southern side of Elmdale Road.
- 4.5 The immediate surrounding area to the north and NW is mainly residential in character, consisting of primarily large late Victorian / early Edwardian semi-detached dwellings, although a small number of modern incursions are noted at the bottom end of Palmerston Crescent. Directly opposite on the other side of Bowes Road there are elements of a mixed-use character.
- 4.6 The site is not statutorily or locally listed, nor located within the boundaries of a Conservation Area.
- 4.7 The application site is identified within the North Circular Area Action Plan.
- 4.8 The site is moderately well connected in terms of public transport and has a good Public Transport Accessibility Level (PTAL) rating of 3 and is sited approximately 600m from Palmers Green Station.
- 4.9 The site does not currently benefit from a vehicular access and is located to the bottom of the cul-de-sac at the turning head adjacent to the cycle lane connecting to the North Circular.
- 4.10 A series of mature trees line the application site, including third party trees at the perimeter of the site.
- 4.11 The following policy designations / characteristics apply to the site:
 - North Circular Area Action Plan
 - Trunk Road Consultation Boundary
 - Sewer Consultation Area

4.12 The following designations are adjacent to the site

- New River
- Wildlife Corridor
- SINCS Metropolitan

5. PROPOSAL

5.1 This is an application for the redevelopment of the site to provide the construction of two buildings ranging from 3-6 storeys in height (with part-basement) to provide 31 residential units, including new vehicular access from Palmerston Crescent, car/cycle parking, landscaping, and other associated works.

5.2 The 31 residential units would comprise the following mix:

- 14 x one bed units (45%)
- 11 x two bed units (36%)
- 6 x three bed units (19%)

5.3 The building heights and unit numbers would be as follows:

- Block A 3 storeys (10 units) 2 x 1-bed, 3 x 2-bed and 5 x 3-bed
- Block B 6 storeys (21 units) 10 x 1-bed, 10 x 2-bed and 1 x 3-bed

5.4 Block A would be sited to the front (east) section of the site fronting an extended vehicular means of access on Palmerston Crescent. The building would be configured over part 3-6 storeys and contain 11 flats. The lower 3 and 4-storey elements would adjoin the existing end of terrace house at no. 106 Palmerston Crescent before stepping up to 5-storeys and a part-recessed 6th storey on the North Circular frontage. Block B would be configured directly to the rear (west) of Block A and is arranged predominantly over 5 storeys (with a recessed 6th storey on the North Circular frontage) containing 20 flats.

5.5 All dwellings would be dual aspect. Additionally, the above ground units would feature private balconies (sized to the minimum space standards). The development would also accommodate a communal garden (561m²), child play space (162m²) and private amenity space (terraces/balconies) as appropriate.

5.6 The overall dwelling mix consists of 17 x market dwellings and 14 x affordable dwellings (comprising in turn 10 x affordable rent and 4 x intermediate/shared ownership units). The affordable housing would equate to 50% of the total number of dwellings by habitable rooms.

5.7 Additionally, three units would be wheelchair accessible (Part M4(3) compliant) in the form of 1 x 1b2p unit (73m²) at ground floor level of Block A (allocated as a market dwelling) and 2 x 1b2p units (each 65m²) at ground floor level of Block B (allocated as intermediate housing).

5.8 The development would be car-free except the provision being made for 3 no. wheelchair accessible parking spaces configured internally of the front Block A. Cycle parking is also provided internally of Blocks A & B in separate bike stores with provision being made for 65 long-stay cycle spaces and 4 visitor spaces.

5.9 The proposed development would be served from an extended vehicular means of access on Palmerston Crescent. The works include the provision of a turning area that would be created by extending the carriageway on Palmerston

Crescent to the south and to the boundary of the footway/cycleway provided along the North Circular. It is proposed to create a shared surface to serve a turning area at the southern end of Palmerston Crescent alongside a level access to the footway/cycleway provided along the North Circular. These works would be secured under a Section 278 Agreement. Additionally, a small part of the site which is designated highway would need to be stopped up.

- 5.10 The overall design approach is deliberately contemporary, but respectful of surrounding context.

Changes post submission:

- 5.11 Some revisions have been made to the scheme during the assessment of the application. These revisions are as follows:
- Design improvements
 - Basement Impact Assessment to consider ground water flood risk
 - Sustainable Urban Drainage (SuDS)

6. RELEVANT PLANNING DECISIONS

- 6.1 21/02406/PREAPP – Proposed redevelopment of site and erection of 29 self-contained units – Pre application advice issued.
- 6.2 22/00882/PREAPP - Proposed development of site to create 31Nos. residential units – Pre application advice given. The key advice provided by officers was to retain as many mature trees as possible, deliver appropriate affordable housing, improve the character and its relationship with Palmerston Crescent and resolve highway matters, specifically disabled parking and access.
- 6.3 TP/06/2360 - Proposed Safety and Environmental Improvement Scheme involving widening and/or realignment of existing carriageway including demolition of existing properties, improvements to the junctions of the North Circular Road with Bounds Green Road, Telford Road/Wilmer Way, Brownlow Road and Green Lanes, modification of other junctions, the provision of new pedestrian crossings and dedicated cycle facilities, together with other ancillary works to the environment (fencing, lighting, landscaping) – Granted with conditions

7. CONSULTATIONS

Public Consultation

- 7.1 Initial consultation on the application involved notification letters being sent to 255 neighbouring properties on 1 October 2023 (giving people 28-days to respond) and a press advert in the Enfield Independent on 6 September 2023 (giving people 14 days to respond).
- 7.2 Additionally, site notices were also posted at the application site on 19 October and expired on 9 November 2023.
- 7.3 In respect of 23/01848/FUL the number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

Number of representations objecting received: 5
Number of representations received in support: 0

7.4 The matters raised were as follows:

- Close to adjoining properties
- Development too high
- Overdevelopment of site
- Inadequate distance from other properties
- Inappropriate scale, height and massing
- Close to adjoining properties
- General dislike of proposal
- Inadequate parking provision
- Inadequate access
- Loss of parking
- Loss of privacy
- Noise nuisance
- Increase of pollution
- Pressure on existing school places – 0.7m from an outstanding school and this will exacerbate existing demand as places are not available
- Inadequate access
- Loss of parking and pressure on existing parking within Palmerston Crescent and the vicinity – bus company uses existing street parking as do not have a car park for staff
- Strain on existing community facilities
- Poor connectivity East to West and into the suburbs, so approximately 30-50 cars would be generated from 31 units
- High street crime
- Noise and air pollution given the proximity to the North Circular
- Out of character with surrounding properties
- Loss of existing cycle infrastructure to provide turning space
- Construction vehicles would further disrupt Palmerston Crescent and Elmdale Road and a further site access should be considered from the North Circular
- Reassurance wanted to ensure the introduction of a CPZ to improve parking for existing residents as existing non-residents take up spaces and a car free development does not ensure that future residents would not have vehicles

Internal

- 7.5 Environmental Health - No objection subject to conditions and a S106 contribution towards air quality monitoring programme
- 7.6 SuDS/Flooding/Drainage – No objections following the receipt of revisions. The SuDS Strategy is in accordance with policy DMD61 of the DMD and the Basement Impact Assessment is acceptable
- 7.7 Traffic and Transportation - No objections subject to conditions and S106 contributions to CPZ and sustainable transport measures and travel plan
- 7.8 Education - No comments
- 7.9 Economic Development – No comments
- 7.10 Housing Renewal – No comments
- 7.11 Health – No comments
- 7.12 Tree Officer - No objections subject to conditions
- 7.13 Urban Design – No objections subject to conditions
- 7.14 Energetik - No objections – previously engaged with the consultants on this development who have been receptive to connecting to the network. Energetik would be happy to connect to the development but are unlikely to extend the

network to the area until 2028. As a result, it is proposed that the development delivers a communal heating system to Energetik's specification, but the heat should initially come from small-scale local communal gas boilers. Energetik would operate the boilers/communal network until the heat network passes the site, at which point it would connect it to the larger network. This is the same solution as is being delivered at Reardon Court

- 7.15 Commercial Waste – No comments
- 7.18 Employment Skills and Strategy – No comments
- 7.19 Crossovers Team – No comments
- 7.20 Property Services – No comments

Statutory and Non- Statutory Consultees

- 7.21 London Fire Service – No comments
- 7.22 Enfield Disablement Association – No comments
- 7.23 Thames Water – No objections subject to informatives. Additionally, as the development is in the vicinity of the New River, it is requested that an impact assessment is considered for the proposed basement to ensure the New River has been considered. Thames Water notes there is a nearby trash screen, although this has not been the subject of complaints by nearby residents.
- 7.24 MPS Designing out Crime – No objections subject to conditions
- 7.25 Transport for London (Planning) - No objections subject to conditions/informatives
- 7.26 Design Review Panel

The scheme was presented to Enfield's Design Review Panel with the earlier design two block scheme considered in November 2021.

The DRP meetings followed from a series of pre-application meetings where the Council's design and planning officers discussed the overall bulk, scale and massing with the applicant, as well as principles for materiality and relationship with the surrounding built context. This scheme differed substantially from the earlier proposal as it provided two buildings. The Panel advised of the potential to provide an active frontage whilst introducing two separate buildings.

The key points from the Panel's response in November 2021 are summarised as follows:

- The panel supports the proposed density and agree the site can accommodate some built elements at 4-5 storeys.
- More work is needed to establish site constraints, including an arboricultural survey and identification of rooms in the flank of 106 Palmerston Crescent.
- The development should improve the environment along the North Circular Road (NCR) and Palmerston Crescent.
- While referencing the building line along Palmerston Crescent is supported, it is recommended that the single mass of the current proposal be broken down into two distinct elements to allow light into the rear amenity space and provide a planted buffer along the NCR. It was encouraging to see that the design team have already explored this potential option and they are encouraged to revisit and refine this further.
- A revised layout should maximise dual aspect (with all units having an aspect away from the NCR, and to the surrounding green spaces).

- Sufficient ground floor activity and overlooking should be maintained through carefully considered internal layouts.
- Building typologies (whatever the chosen layout) should investigate the use of open cores and/or deck access to help deliver dual aspect and cross ventilation.
- The next iteration of design should consider practical implications of plant rooms and the chosen mechanical heating/cooling/ventilation systems for the building and within individual units.
- There is ample green space at ground floor and roof spaces could therefore be reallocated for photovoltaic panels (PVs) and other sustainability features.

8. RELEVANT POLICIES

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

The London Plan 2021

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

- GG1 Building Strong and Inclusive Communities
- GG2 Making the Best Use of Land
- GG3 Creating a Healthy City
- GG4 Delivering the Homes Londoners Need
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D2: Infrastructure Requirements for Sustainable Densities
- D3: Optimising Site Capacity Through the Design-led Approach:
- D4: Delivering Good Design
- D5: Inclusive Design
- D6: Housing Quality and Standards:
- D7: Accessible Housing
- D8: Public Realm
- D11 Safety, Security and Resilience to Emergency
- D12 Fire Safety
- D13 Agent of Change
- D14 Noise
- E11 Skills and Opportunities for All
- H1 Increasing Housing Supply (*):
- H4 Delivering Affordable Housing
- H5 Threshold Approach to Applications
- H6 Affordable Housing Tenure
- H10 Housing Size Mix (*)
- H11 Build to Rent
- HC1 Heritage Conservation and Growth
- G1 Green Infrastructure
- G5 Urban Greening
- G6 Biodiversity and Access to Nature
- G7 Trees and Woodlands
- S1 Developing London's Social Infrastructure
- S4 Play and Informal Recreation

- SI1 Improving Air Quality
- SI2 Minimising Greenhouse Gas Emissions
- SI3 Energy Infrastructure
- SI 4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital Connectivity Infrastructure
- SI7 Reducing Waste and Supporting the Circular Economy
- SI 8 Waste capacity and net waste self-sufficiency
- SI12 Flood Risk Management
- SI13 Sustainable Drainage
- T1 Strategic Approach to Transport
- T2 Healthy Streets
- T3 Transport Capacity, Connectivity and Safeguarding
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking
- T7 Deliveries, servicing and construction
- T9 Funding Transport Infrastructure Through Planning
- DF1 Delivery of the Plan and Planning Obligations

Local Plan – Overview

- 8.3 Enfield's Local Plan comprises the Core Strategy, Development Management Document, Policies Map and various Area Action Plans as well as other supporting policy documents. Together with the London Plan, it forms the statutory development policies for the borough and sets out planning policies to steer development according to the level it aligns with the NPPF. Whilst many of the policies do align the London Plan (2021), it is noted that the London Plan supersedes the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan.

Local Plan – Core Strategy (2010)

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

- CP 1: Strategic Growth Areas
- CP 2: Housing Supply and Locations for New Homes
- CP 3: Affordable Housing
- CP 4: Housing Quality
- CP 5: Housing Types
- CP 9: Supporting Community Cohesion
- CP 17: Town Centres
- CP 20: Sustainable Energy Use and Energy Infrastructure
- CP 21: Delivering Sustainable Water Supply, Drainage Sewerage Infrastructure
- CP 24: The Road Network
- CP 25: Pedestrians and Cyclists
- CP 26: Public Transport
- CP 28: Managing Flood Risk Through Development
- CP 29: Flood Management Infrastructure

CP 30:	Maintaining and Improving the Quality of the Built and Open Environment
CP 31:	Built and Landscape Heritage
CP 32:	Pollution
CP 34:	Parks, Playing Fields and Other Open Spaces
CP 36:	Biodiversity
CP 44:	North Circular Area

Local Plan - Development Management Document (2014)

8.6 The Council's Development Management Document (DMD) provides further detail and standard based policies by which planning applications should be determined. Policies in the DMD support the delivery of the Core Strategy.

8.7 The following local plan Development Management Document policies are considered particularly relevant:

DMD 1:	Affordable Housing on Sites Capable of Providing 10 units+
DMD 3:	Providing a Mix of Different Sized Homes
DMD 6:	Residential Character
DMD 8:	General Standards for New Residential Development
DMD 9:	Amenity Space
DMD1 0:	Distancing
DMD 28:	Large Local Centres, Small Local Centres and Local Parades
DMD 37:	Achieving High Quality and Design-Led Development
DMD 38:	Design Process
DMD 43:	Tall Buildings
DMD 44:	Conserving and Enhancing Heritage Assets
DMD 45:	Parking Standards and Layout
DMD 47:	New Road, Access and Servicing
DMD 48:	Transport Assessments
DMD 49:	Sustainable Design and Construction Statements
DMD 50:	Environmental Assessments Method
DMD 51:	Energy Efficiency Standards
DMD 52:	Decentralized Energy Networks
DMD 53:	Low and Zero Carbon Technology
DMD 54:	Allowable Solutions
DMD 56:	Heating and Cooling
DMD 57:	Responsible Sourcing of Materials, Waste Minimisation
DMD 58:	Water Efficiency
DMD 59:	Avoiding and Reducing Flood Risk
DMD 60:	Assessing Flood Risk
DMD 61:	Managing surface water
DMD 62:	Flood Control and Mitigation Measures
DMD 64:	Pollution Control and Assessment
DMD 65:	Air Quality
DMD 66:	Land Contamination and instability
DMD 68:	Noise
DMD 69:	Light Pollution
DMD 70:	Water Quality
DMD 71:	Protection and Enhancement of Open Space
DMD 72:	Open Space Provision
DMD 73:	Child Play Space
DMD 76:	Wildlife Corridors
DMD 77:	Green Chains
DMD 78:	Nature Conservation
DMD 79:	Ecological Enhancements

DMD 80: Trees on Development Sites
DMD 81: Landscaping

North Circular Area Action Plan

- 8.8 The North Circular Area Action Plan (NCAAP) sets out a planning framework for the future of the North Circular corridor between the A109 at Bounds Green and the A10 Great Cambridge Road. The adopted NCAAP forms an integral part of the Local Plan, sitting alongside the adopted Core Strategy (2010), the adopted Development Management Document (DMD, (2014), and other area-based plans being prepared for Enfield's strategic growth and regeneration areas. The NCAAP provides more detailed and area-specific policy and framework for this part of the borough. New development proposals coming forward within the area are expected to accord with the policies and proposals unless other material planning considerations indicate otherwise. The objectives are to improve neighbourhoods, housing and jobs, movement, environment, infrastructure and phasing and delivery. Of particular relevance to this application are policies NC Policies 2, 6, 9, 10, 11 and 25, which are summarised as follows:
- 8.9 NC Policy 2 'New and Refurbished Homes' identifies 20 sites within the NCAAP area which have the potential to deliver approximately 1,400 new homes within the plan period up to 2026.
- 8.10 NC Policy 6 'High Quality Design of New Development' states that new development within the NCAAP area will be high quality and design led...taking careful account of urban context and reinforcing local distinctiveness. Of particular importance is that new developments on sites along the North Circular Road must address the road directly with doors, windows and balconies and appropriate boundary treatment which responds positively to the route and treats it as a 'front'.
- 8.11 NC Policy 9 'Environmental Mitigation – Air Quality and Noise Pollution' notes that in relation to air quality the design of new developments and their associated landscaping proposals can significantly help in the mitigation of environmental problems such as air and noise pollution.
- 8.12 NC Policy 10: Open Spaces states that new development should make appropriate contributions to improving the quality of the existing open space network across the NCAAP area.
- 8.13 NC Policy 11: Three Neighbourhood Places identifies three neighbourhood places, including Green Lanes, which serve their respective local communities. The key priorities include the junction between Green Lanes and North Circular Road will be a major focus for change with several development sites supporting the wider regeneration of the area. Whilst the existing commercial parades on the south side of the main junction remain intact and address the corner successfully, the parade on the north side of the junction is less successful. There may, therefore, be opportunities to improve this prominent location, particularly on the northern side
- 8.14 NC Policy 25: Green Lanes Neighbourhood Place identifies key sites to the northern side of Green Lanes and principles for redevelopment including townscape, activities, public realm and open space and infrastructure.

Enfield Draft New Local Plan

- 8.15 Work on a New Enfield Local Plan has commenced so the Council can proactively plan for appropriate sustainable growth, in line with the Mayor of London's "good growth" agenda, up to 2041. The Enfield New Local Plan will

establish the planning framework that can take the Council beyond projected levels of growth alongside key infrastructure investment.

- 8.16 The Council has published the Enfield Local Plan 2019-2041 for Regulation 19 Consultation between 28 March and 20 May 2020. The Enfield Local Plan is at an advanced stage of preparation and is considered by the council to be sound and will not be modified significantly prior to examination. NPPF 2023 Paragraph 48 states that decision-makers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the London Plan and NPPF 2023. At present, the emerging Enfield Local Plan policies carry little weight. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough's needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.
- 8.17 As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight, but at this stage it has relatively little weight in the decision-making process.
- 8.18 Key emerging policies from the plan are listed below:
- Policy DM SE2 – Sustainable design and construction
 - Policy DM SE4 – Reducing energy demand
 - Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
 - Policy DM SE7 – Climate change adaptation and managing heat risk
 - Policy DM SE8 – Managing flood risk
 - Policy DM SE10 – Sustainable drainage systems
 - Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
 - Policy DM BG8 – Urban greening and biophilic principles
 - Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
 - Policy DM DE2 – Design process and design review panel
 - Policy DM DE7 – Creating liveable, inclusive and quality public realm
 - Policy DM DE10: Conserving and enhancing heritage assets
 - Policy DM DE11 – Landscape design
 - Policy DM DE13 – Housing standards and design
 - Policy DM H2 – Affordable housing
 - Policy DM H3 – Housing mix and type
 - Policy DM T2 – Making active travel the natural choice

Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

National Planning Policy Framework (February 2023)

- 8.19 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 8.20 The NPPF recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 8.21 In relation to achieving appropriate densities paragraph 122 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.
- 8.22 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

National Planning Practice Guidance (NPPG)

- 8.23 The Government published NPPG sets out further detailed guidance on the application of policies set out in the NPPF. NPPG guidance covers matters such as decision making, planning conditions and obligations, EIA, the historic and natural environment and design.

Other Material Considerations and guidance

- 8.24 The following guidance is also considered particularly relevant:

Enfield Climate Action Plan (2020)
Enfield Housing and Growth Strategy (2020)
Enfield Intermediate Housing Policy (2020)
Enfield Biodiversity Action Plan
Enfield Characterisation Study (2011)
Enfield Local Heritage List (May 2018)
Enfield S106 SPD (2016)
Enfield Decentralised Energy Network Technical Specification SPD (2015)
London Councils: Air Quality and Planning Guidance (2007)
TfL London Cycle Design Standards (2014)
GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
GLA: London Sustainable Design and Construction SPG (2014)
GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
GLA: Social Infrastructure SPG (2015)
GLA: Housing SPG (2016)
GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
Mayor's Transport Strategy (2018)
GLA Threshold Approach to Affordable Housing on Public Land (2018)
Healthy Streets for London (2017)
Manual for Streets 1 & 2, Inclusive Mobility (2005)
National Design Guide (2019)

Housing Delivery Test and Presumption in Favour of Sustainable Development

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

“(c) approving development proposals that accord with an up-to-date development plan without delay; or
(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (7), granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (6); or

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

- 8.26 Footnote (7) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates

that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”

- 8.27 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.
- 8.28 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.
- 8.29 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.
- 8.30 In 2020 Enfield delivered 56% of the 2,328 homes target for the preceding three-year period. In 2021, Enfield delivered 1,777 of the 2,650 homes required, a rate of 67%. In 2022, Enfield delivered 2,270 of 3,098 homes, a proportion of 73% and, therefore, now falls into the “presumption in favour of sustainable development” category.
- 8.31 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.

9 ANALYSIS

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

- Principle of Development (Land Use)
- Housing Need and Delivery
- Optimising site capacity
- Housing Mix
- Residential Quality and Amenity
- Design

- Heritage
- Neighbouring Amenity
- Transport
- Trees and Landscaping
- Water Resources, Flood Risk and Drainage
- Environmental Considerations
- Site Waste Management
- Contaminated Land
- Air Quality / Pollution
- Health
- Fire Safety
- Community Infrastructure Levy and S106

9.2 Principle of Development (Land Use)

- 9.2.1 In terms of the overarching principle of development the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise.
- 9.2.2 Additionally, the aim is that planning should facilitate the delivery of sustainable development. This is achieved by ensuring that the right development is built on the right land; that development helps to support communities with sufficient homes, accessible services, and open spaces; and development protects and where appropriate, enhances the natural, built and historic environment.
- 9.2.3 Paragraph 8 of the NPPF sets out three overarching objectives, in order to achieve sustainable development. These objectives are interdependent and need to be pursued in mutually supportive ways and include the following (with detail provided on the most relevant objective to this section): a) an economic objective; b) a social objective; and, c) an environmental objective –to contribute to protecting and enhancing our natural, built and historic environment.
- 9.2.4 With regards to the existing land use, it is noted that the NPPF (Para. 118) advocates the promotion and support the development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 9.2.5 Furthermore, paragraph 1.2.5 of the London Plan states that ‘all options for using the city’s land more effectively will need to be explored as London’s growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London’. In particular, Policy GG2 requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield land and delivering additional homes.

Comprehensive Redevelopment of Brownfield Land

- 9.2.6 The scheme proposes the redevelopment of the site, which is currently vacant having previously served as housing and later land for future highway improvement pertaining to the A406. The site currently features overgrown, wild vegetation and has been enclosed by hoarding and currently serves no architectural function to the area.
- 9.2.7 The site is situated within the North Circular Area Action Plan Area (2014). The potential for development was set out in adopted Enfield Development Plan policy – specifically, within the North Circular Area Action Plan (2014). The desire for the development and improvements to the North Circular Area are also outlined within policies CP1, CP2 and CP44 of the Core Strategy.

- 9.2.8 Core Policy 44 'North Circular Area' of the Core Strategy is relevant and seeks to promote environmental and housing improvements and new investment in the North Circular area. It estimates that the North Circular area has the potential to accommodate up to 2,000 new homes, which includes sites along the North Circular Road and New Southgate/Ladderswood Estate. It specifies that new development would be designed to be compatible with a busy road, with outdoor amenity space, and would help to cross-fund environmental improvements such as tree planting and landscaping, helping to create a noise 'buffer' between housing and the road. New homes would provide a mix of size, tenure, and affordability to meet the needs of existing and new residents.
- 9.2.9 Core Policy CP44 also seeks improvements to the Green Lanes Large Local Centre, which is located approximately 250m away to the east. The improvements would include higher density commercial development with residential uses above at the junction of Green Lanes and the North Circular, improvements to the public realm at Green Lanes and improved library facilities at Palmers Green and Arnos Grove.
- 9.2.10 Policy NC11 of the North Circular Area Action Plan identifies three neighbourhood places, including Green Lanes, which serve their respective local communities. The key priorities include the junction between Green Lanes and North Circular Road will be a major focus for change with several development sites supporting the wider regeneration of the area. Whilst the existing commercial parades on the south side of the main junction remain intact and address the corner successfully, the parade on the north side of the junction is less successful. There may, therefore, be opportunities to improve this prominent location, particularly on the northern side. Additionally, Policy NC25 identifies key sites to the northern side of Green Lanes alongside principles for redevelopment including townscape, activities, public realm and open space and infrastructure. It specifies that there is the potential for an additional 135 units supported by additional commercial uses. This would further support the vitality and viability of the Green Lanes Large Local Centre. The site is a windfall site and not specifically identified within the Plan, however the principle of development on this site is supported, having regard to the aims and objectives outlined within the North Circular Action Plan, including policies NC11 and NC25.
- 9.2.11 At a regional level, policy GG2 of the London Plan seeks to make the best use of land and to enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites. It also identifies that prioritisation of sites, which are well-connected by existing or planned public transport and to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling and to encourage a design-led approach to determine the optimum development capacity of sites. It is considered that the application site is well located to meet the optimum development capacity having regard to its siting within 300m to the Green Lanes Large Local Centres to the north and south and sandwiched by the Palmers Green District Centre to the north. The area is also served by Palmers Green and Bowes Park overground stations (approximately 600m and 750m away) and the Bounds Green underground is also located to the southwest.
- 9.2.12 In this respect, the principle of the redevelopment of the site is deemed acceptable, having regard to policies CP1, CP2 and CP44 of the Core Strategy, GG2 of the London Plan and the aims and intentions outlined within the adopted

North Circular Area Action Plan (2014) and the advice contained within the NPPF.

Residential Use

- 9.2.13 With specific regard to the residential element of the proposal, it was noted that the NPPF sets out the government's objective to boost the supply of homes. The NPPF also states an intention to ensure that supply meets the needs of different groups in the community, including an affordable housing need. Policy GG4 of the London Plan supports this intention, stating that planning and development must 'ensure that more homes are delivered'.
- 9.2.14 At a regional level, Policy H1 of the London Plan highlights the importance of encouraging residential development on appropriate windfall sites, especially where they have a high PTAL rating (ratings 3 to 6) or are located within 800m of a tube station. The Council's Core Strategy (4.1 Spatial Strategy), identifies that sustainable locations for development would be concentrated in town centres, on previously developed land and that new homes will be planned through the intensification of land uses. It was noted, however, that this site is not entirely a windfall site as the area has been identified for redevelopment within the Core Strategy and the adopted North Circular Area Action Plan (2014), which together provide a stronger emphasis on its potential for redevelopment.
- 9.2.15 Paragraphs 102 and 103 of the NPPF outlines the objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport, and requires development be focused on locations which are sustainable and can offer a range of transport modalities to help reduce congestion and emissions and improve air quality and public health. The development site is in an accessible and sustainable location, within close proximity to both overground and underground station with a bus interchange immediately at the front of the site.
- 9.2.16 The proposal is for 31-residential units on a site where the adopted development has identified potential to introduce new housing (NCAAP). Enfield's Authority Monitoring Report 2020/2021 shows that during the preceding 10 years, the Borough had delivered a total of 5,616 homes which equates to approximately 562 homes per annum. Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with only 60% of approvals being implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough.
- 9.2.17 In 2020, Enfield delivered 56% of the 2,328 homes target for the preceding three-year period. In 2021, Enfield delivered 1,777 of the 2,650 homes required, a rate of 67%. In 2022, Enfield delivered 2,270 of 3,098 homes, a proportion of 73% and, therefore, now falls into the "presumption in favour of sustainable development" category. Thus, having regard to the target of 1,246 per annum the borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs, which is the case for this particular site.
- 9.2.18 At a regional level, Policy H1 of The London Plan advocates for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL rating of 3-6), and mixed-use redevelopment of car parks and public sector owned sites.

- 9.2.19 The existing site offers no architectural value, and its redevelopment would allow the provision of a well-designed and good quality residential accommodation alongside environmental improvements. These include noise, air quality and high-quality landscaping to an otherwise urban environment alongside the North Circular (A406).
- 9.2.20 Taking into account the housing needs of Enfield's population, nationally- and regionally-set housing delivery targets and shortfalls in meeting targets, it is evident that this proposal to provide homes at a high-quality and with a range of housing types is wholly supported by policy, most notably London Plan Policies GG2, GG4, D1, D3, H1, H2 and H11, Core Strategy Policies 1, 2, 44 and 4.1 (Spatial Strategy) and advice contained within the NPPF. As such the Development is supported in principle terms subject to other material planning considerations as outlined below.

9.3 Housing need and delivery

- 9.3.1 The NPPF (Para. 123) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:...c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). The current London Plan sets a target for the provision of 52,287 new homes across London each year as outlined within Policy H1.
- 9.3.2 Table 4.1 of the London Plan identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the previous target of 798. Furthermore, the site is less than 0.25 hectares and thus is identified as a small site within the London Plan. Policy H2 of the London Plan alongside Table 4.2 specifies the need for 3,530 new homes to be delivered within small sites across Enfield over the next 10 years.
- 9.3.3 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious London Plan targets.
- 9.3.4 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reasons for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018. This has increased substantially since 2023.
- 9.3.5 The fourth and fifth ambitions of the strategy are in respect of inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the

Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.

- 9.3.6 Taking into account both the housing need of the borough together with a position of "presumption in favour of sustainable development", it is clear that the council must seek to optimise development on brownfield sites, particularly those that are currently not being optimised, including small sites.

Affordable Housing

- 9.3.7 The NPPF must be regarded in the preparation of local plans and is a material consideration in planning decisions. Annex 2 of the Revised NPPF (2021) defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable.
- 9.3.8 Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on site capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances, and the mix of affordable housing should reflect the need for larger family units, in accordance with policy CP5 of the Core Strategy. The Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision. However, having regard to the Council's 'presumption in favour of sustainable development category', further weight is attributed to London Plan policies and the evidence obtained for the emerging Local Plan policy, including the Local Housing Needs Assessment (2020).
- 9.3.9 According to the Enfield Local Housing Needs Assessment (LHNA), there is a requirement for 1,407 affordable homes annually to address the combined need for affordable/social rented housing (711 homes) and affordable homeownership or intermediate rented housing (696 homes). This points toward a policy approach involving an equal split of 50% for social/affordable rented housing and 50% for intermediate housing.
- 9.3.10 Policy DMD1 of the Development Management Document refers to affordable housing comprising three tenures: social rent, affordable rent, and intermediate housing. It states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need.

Affordable housing delivery in Enfield

- 9.3.11 This current target of 40% affordable housing delivery is not currently being met in the Borough. The Housing and Growth Strategy (2020) sets out an ambition to increase the target of 50% of new homes to be affordable housing in the next Local Plan. Enfield's Housing and Growth Strategy (2020) states the Borough's ambition to develop more homes that are genuinely affordable to local people, so more people can live in a home where they spend a more reasonable proportion of their household income on housing costs.

Assessment: Maximising affordable housing

- 9.3.12 The Applicant has submitted an Affordable Housing Statement, dated May 2023), which meets the requirements of the Fast Track route.

9.3.13 Policy H5 of the London Plan sets out the requirements of the Fast Track Route of the threshold approach. It specifies that applications must meet all the following criteria:

- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
- 2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
- 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
- 4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.

9.3.14 The Statement outlines that the development would provide 31 residential units with a mix of 14 x 1-bed, 11 x 2-bed and 6 x 3-bed. The overall tenure mix comprises 17 x market dwellings and 14 x affordable dwellings (comprising in turn of 10 x affordable rent (5 x London Affordable Rent and 5 x Affordable Rent) and 3 x intermediate units (Shared Ownership). The affordable housing would equate to 50% of the overall number of dwellings by habitable rooms (44 habitable rooms of the 88 habitable rooms proposed overall), or 45.2% by unit

9.3.15 Officers therefore acknowledge that the scheme delivers a policy-compliant level of affordable housing and a tenure split that is in accordance with London Plan Policies H4, H5 and H6 and borough evidence.

9.3.16 The details of the Affordable Housing will be secured by Section 106 agreement.

9 4 Housing mix and tenure

9.4.1 Policy H10 of the London Plan states that schemes should generally consist of a range of unit sizes, having regard to various factors including local demand, the need to deliver a range of unit types at different price points across London, the mix of uses and the range of tenures, the nature and location of the site and the aim to optimise housing potential at the site.

9.4.2 The proposed breakdown of the 31 residential units would comprise 14 (1-bed 45%), 11 (2-bed (36%), and 6 (3-bed (19%).

9.4.3 The Local Housing Needs Assessment 2020 was prepared to support the emerging Local Plan and is the most up-to-date source of evidence. Reflecting London Plan Policy H10 A1, Draft Local Plan Policy H3 (while it is not adopted policy), outlines priority types for different sized units across different tenures:

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

- 9.4.4 The Council's Local Housing Needs Assessment 2020 outlines that 41.1% of new affordable homes should have three bedrooms. This is based on housing register evidence. It also outlines that the focus of affordable ownership provision (shared equity/intermediate products) should be on one and two-bedroom units, as the majority of households who live in intermediate (shared ownership) housing are those without children. The proposals for social rent incorporate 8 out of the proposed 10 units as two or three bed. Furthermore, 5 out of these units would be three beds, which is welcomed in policy terms as it would accommodate a high proportion of family housing. Additionally, the 4 intermediate rent units would provide for 1, or 2-bed units, which is acceptable as many intermediate households are households without children.
- 9.4.5 With regard to market rent, the Council's Local Housing Needs Assessment (2020) identifies that there is a medium priority for two and high priority for three bedrooms. The proposals seek to provide 8 out of 17 units as two or three bedroom. This equates to 47%, which is deemed acceptable to provide a variety of different unit sizes and having regard to the local character of Palmers Green, which predominantly comprises a high proportion of 3+bed family housing.
- 9.4.6 The scheme would provide 50% affordable housing (by habitable room) with a breakdown of 71% social rent (10 affordable rent) and 29% intermediate rent (shared ownership). The breakdown of units is as follows:

Tenure Type	Total Units	Total Habitable Rooms
Market	17	44
1-bed (1b2p)	9	19
2-bed (2b4p)	7	21
3-bed (3b6p)	1	4
Affordable Rent	10	35
1-bed (1b2p)	2	4
2-bed (2b4p)	3	9
3-bed (3b4p)	1	4
3-bed (3b5p)	3	14
3-bed (3b6p)	1	4
Intermediate	4	9
1-bed (1b2p)	3	6
2-bed (2b4p)	1	3
Total	31	88

- 9.4.7 The proposed housing mix is considered appropriate, having regard to policies CP5 of the Core Strategy, DMD3 of the Development Management Document and H10 of the London Plan and the information contained within the Councils Strategic Housing Market Assessment.

9.5 Residential Quality and Amenity

- 9.5.1 The NPPF (Para.12) identifies good design as a key aspect of sustainable development, stating that 'the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve'. The guidance states that developments should seek to:

Function well and add to the overall quality of the area for the lifetime of the development;

Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

Be sympathetic to local character and history;

Establish a strong sense of place and welcoming and distinctive places; and

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

- 9.5.2 Policy D6 of the London Plan outlines housing quality and design standards that housing developments must consider to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space. The Policy notes that design must not be detrimental to the amenity of surrounding housing. Table 3.1 sets out the internal minimum space standards for new developments and Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments.
- 9.5.3 Alongside this, policies D5 and D7 of the London Plan set out that new developments are required to support mixed and inclusive communities, which includes provision for wheelchair accessible and wheelchair adaptable units, as well as an environment that is welcoming and accessible by all.

Accessible Housing

- 9.5.4 Policy D7 of the London Plan states that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 of the Development Management Document has similar policy objectives. Policy D7 of the London Plan sets out that to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that: i) at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. 10% of units in the scheme will be reserved as dedicated accessible homes in accordance with the Building Regulation 2010 requirement M4(3): "Wheelchair user dwellings". All other units will be designed in accordance with Building Regulation Standards M4(2), "Accessible and adaptable dwellings" to provide for other types of access needs and potential future requirements. The submitted details specify that a total of 3 units (10%) would be wheelchair adaptable with 1 x 1b2p (73m²) at ground floor level of Block A (allocated as a market dwelling) and 2 x 1b2p units (each 65m²) at ground floor level of Block B (allocated as intermediate housing). On that basis, the submitted details are considered acceptable in policy terms, and an appropriate condition would be attached to secure compliance.

Housing quality

- 9.5.5 All of the units either meet or exceed internal floorspace standards required by policy D6, Table 3.1 of the London Plan and comply with the qualitative design aspects to be addressed in housing developments required by Table 3.2. The Planning Statement confirms that all 31 units would meet or exceed Nationally Described Space Standards and would include private balconies (above ground units) and communal amenity space at ground floor level.
- 9.5.6 Furthermore, all units are dual aspect. This is a significant achievement. While it would have been better to organise the buildings with a completely protected façade (away from the North Circular Road) as noted, the applicant is following the advice of the Design Review Panel, and a façade angled away from the North Circular Road is an acceptable compromise.

- 9.5.7 It would have been preferable for unit B3 to have direct access to the balcony from the living space. However, as this is a 1-bedroom apartment, no objection is raised.
- 9.5.8 There is concern regarding the restricted width of doors providing access to the basement cycle stores in block B, however this will be clarified with the applicant, and where appropriate, secured by condition.
- 9.5.9 The submitted details confirm that the garden is formed of two parts comprising an informal nature garden and shared space with natural play and communal seating areas.
- 9.5.10 A total area of communal amenity space at ground floor level equates to 561 sq.m within two sections to the rear aspects - north and west of the site alongside 162 sq.m of child play space. This is deemed to be an appropriate location as the western aspect abuts the New River and the rear siting also supports the location away from the noise and pollution of the North Circular Road (A406).

Daylight/sunlight future occupiers

- 9.5.11 The submitted Daylight/Sunlight Assessment (May 2023) includes an assessment of daylight/sunlight and overshadowing to windows, gardens, and open spaces for future occupiers of the development. The guidance outline three detailed methods for calculating daylight: Average Daylight Factor, Room Depth and Daylight Distribution.
- 9.5.12 The Assessment concludes that the proposed development design achieves a very high level of compliance with the BRE recommendations. Whilst a small number of rooms and outdoor amenity areas do not meet the recommendations, the results are not considered to be unusual in the context of an urban location. It is therefore concluded that good quality accommodation would be provided for future occupiers and thus would provide acceptable living standards whilst making efficient use of land in accordance with the advice contained within the NPPF.

Child Playspace and Amenity Space

- 9.5.13 Policies D6 and S4 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation noting the provision of play space should integrate with the public realm without compromising the amenity needs/enjoyment of other residents and encourage children to play.
- 9.5.14 The Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG sets a benchmark of 10 sq.m. of useable children's playspace to be provided per child, with particular emphasis on playspace for children under five years old to be provided on-site. Additionally, Policy S4 of the London Plan also recommends that at least 10 sq.m of playspace per child should be provided. In comparison, at a local level Policy DMD73 of the Development Management Document does not specify a specific amount of space per child, it sets out that developments with an estimated child occupancy of ten or more children will be required to incorporate on-site play provision to meet the needs arising from the development. Also, Policy DMD9 of the Development Management Document solely refers to amenity space within new developments.
- 9.5.15 The submitted Landscaping Statement confirms that appropriate amenity space would be provided, a total of 723 sq.m across the site. This would include a 561 sq.m of communal garden and 162 sq.m of child play space. The amenity space would be divided to feature an informal nature garden and shared space with natural play and communal seating.

- 9.5.16 In regard to children's play space, a total of 161.5 sq.m would be required based on the GLA Population Yield Calculator. The development would provide 162 sq.m, which is considered acceptable having regard to policies D6 and S4 of the London Plan and DMD73 of the Development Management Document as well as the guidance contained within the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.
- 9.5.17 With regards to landscape provision on the site and residential amenity space, each unit would have a private balcony/private ground floor terrace that meets required size standards as stated in the London Plan.
- 9.5.18 Taking all of the above into consideration the Proposed Development is considered acceptable in terms of playspace, amenity space and landscape provision, having regard to policies DMD8, DMD9 and DMD73 of the Development Management Document, D6 and S4 of the London Plan as well as the guidance outlined within the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.

9.6 Efficient use of land and optimising site capacity

- 9.6.1 Objections have been received that the proposals would result in overdevelopment and excessive density within the locality. Officers have assessed density and site capacity – and consider the proposals are aligned with adopted local and regional (London) policies and guidance in respect of density.
- 9.6.2 Officers have assessed that the proposal is aligned with requirements of the National Planning Policy Framework – that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and that planning decisions should promote and support the development of under-utilised land, including through the more effective use of car parks.
- 9.6.3 This is in addition to the applicant following a design-led response, in accordance with the preferred and London Plan approach to optimising site capacity.
- 9.6.4 The revised NPPF introduced Section 11 (Making Effective Use of Land). Paragraph 118 sets out 5 points planning decisions should consider in promoting the effective use of land. It supports development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 9.6.5 Paragraph 118 parts (c) and (d) are particularly relevant, stating that planning decisions should:
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...;*
- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).*
- 9.6.6 Paragraph 121 encourages that local authorities take a positive approach to applications for alternative uses, where land is currently developed but not allocated. Paragraphs 122 and 123 set out provisions for achieving appropriate densities – providing clear support for avoiding low densities in areas where

there is existing or anticipated shortage of land for meeting identified housing needs. Paragraph 123(C) of the revised NPPF is relevant and states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies of the NPPF.

- 9.6.7 In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 9.6.8 Paragraph 122 of the NPPF states that in respect of development density, consideration should be given to whether a place is well designed and ‘the desirability of maintaining an area’s prevailing character and setting...or of promoting regeneration and change’.
- 9.6.9 Policy H10 of the London Plan (2021) promotes higher density development in locations with a good PTAL score and in close proximity to a local centre in order to ensure the most efficient use of land and to optimise the provision of housing. The London Plan incorporates a different approach to assessing density – advocating a design-led approach. London Plan Policy D3 does not follow a matrix approach providing indicative densities. It instead advocates for the best use of land by following a design-led approach that optimises the capacity of sites. Policy D2 of the London Plan (2021) states that development proposals should consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels and be proportionate to the site’s connectivity and accessibility by walking, cycling and public transport to jobs and services (including both PTAL and access to local services).
- 9.6.10 Additionally, Policy D3 refers to optimisation of site capacity to provide a development that is the most appropriate form and land use for the site. It also states that development proposals should respond to form and layout, experience, quality and character. Furthermore, the policy details that density measures related to the residential population will be relevant for infrastructure provision and measures of density related to the built form and massing will inform its integration with the surrounding context.
- 9.7.11 Policies CP4 and CP30 of the Core Strategy stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Local Plan Policy DMD37 calls for a design-led approach to ‘capitalising’ on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity. Policy DMD8 requires proposals be in an appropriate location and of a suitable scale, bulk and massing.
- 9.6.12 Policy DMD6 of the Development Management Document promotes density appropriate to the locality – in line with the previously superseded London Plan Policy 3.4 density matrix. Policy DMD8 which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing. In this instance the Proposed Development is in an accessible location with a PTAL rating of 3, within close proximity to both underground/overground stations, a main arterial route (North Circular (A406) and several bus routes. Enfield Issues and Options (Regulation 18) document (Para. 2.4.1), acknowledges the need to ‘exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities with this aim being a ‘first principle’ of the document.
- 9.6.13 Enfield’s Design Review Panel concluded, in their last review of the two building proposals that the density, height and scale were supported and appropriate for the surrounding context. This included elements at five storeys.

- 9.6.14 Furthermore, the Council's Urban Design officer, concluded that the testing of height, footprint, quality of dwellings and open space provision, as well as connectivity of the site, infrastructure and development potential has been considered to determine the quantum of the scheme and thus concluded that the proposed quantum was considered acceptable
- 9.6.15 The scheme, when assessed against adopted density policy, would not result in overdevelopment or excessive density. The scheme would result in a well-designed development and approach to the public realm, providing 31 residential units across the site. When considering the proposed density in the round alongside the site's moderate PTAL rating, its acceptable impact on residential amenity and its sufficient social infrastructure, it is considered that the scheme results in an appropriate level of development for the site. Further, the quantum of units proposed is acceptable in its specific local setting, subject to all other material planning considerations being met. In density terms the proposed development is in line with adopted policy both at local and regional level.

9.7 Design

- 9.7.1 The National Design Guidance sets out that well-designed places have ten key characteristics which work together to create its physical character and help to nurture and sustain a sense of community. The Guidance further states that these 10-characteristics contribute towards the cross-cutting themes for good design set out in the NPPF. The ten characteristics are as follows:

Context – enhances the surroundings;
Identity – attractive and distinctive;
Built form – a coherent pattern of development;
Movement – accessible and easy to move around;
Nature – enhanced and optimised;
Public spaces – safe, social and inclusive;
Uses – mixed and integrated;
Homes and buildings – functional, healthy and sustainable;
Resources – efficient and resilient; and
Lifespan – made to last.

- 9.7.2 Additionally, at regional level policies D3, D4, D5, D6, D8, D9, D14, S4, S6, G4 and G5 are relevant alongside local level policies CP30 of the Core Strategy and DMD8, DMD37, DMD39 and DMD43 of the Development Management Document.
- 9.7.3 Heritage and character have been proactively considered and influenced the overall design and layout of the proposal. The proposal has been subject to extensive pre-application engagement and an independent design review processes.
- 9.7.4 Enfield's Conservation Officers have raised no concerns about the proposed development. Enfield's Urban Design Officers are supportive of the design merits of the scheme.
- 9.7.5 The scheme is a well-considered architectural response on a challenging site. It proposes significant enhancements, which would benefit future residents.

Siting and Layout

- 9.7.6 The scheme has undergone a very productive and collaborative preapplication process, including a Design Review Panels, that identified the constraints and

opportunities of the site and its potential in unlocking the challenging site for development.

- 9.7.7 The Panel recommended that the layout was reconfigured to provide two separate buildings oriented at a 45-degree angle from the North Circular to allow more opportunities for dual aspect and a protected rear amenity space that would receive increased sunlight/daylight between the buildings. The proposed units have an east-west aspect to maximise views of the green spaces within the site and the New River. Additionally, an effort has been made to provide a green buffer to the North Circular with retained trees and increased planting to improve the existing environment.
- 9.7.8 The applicant has responded to this advice, which has resulted in more of a challenge to retain an active frontage to both Palmerston Crescent and the North Circular Road, while protecting residents from the noise and pollution from the latter and creating a clear distinction between public fronts and private backs. The applicant has also taken on board the advice of the Local Planning Authority in order to address these issues. Both buildings have a significant ground floor street presence. The substation and district heating plant location detract from this. However, given the location immediately adjacent and facing the North Circular Road, as well as the requirement for vehicle access to these areas, this compromise is considered acceptable.
- 9.7.9 Furthermore, the applicant has taken on board requests to better activate Palmerston Crescent (compared to previous iterations) by locating the kitchen of the ground floor home in Block A in front of the proposed parking. Unfortunately, this does mean that the usual 1.5m of defensible space has not been provided in front of the kitchen window. However, in this case, there is a requirement to provide the maximum offset to tree T3 to ensure it retains sufficient root growing area. Given that this is a less private room, this compromise is considered acceptable.
- 9.7.10 The result is that the disabled parking bays are successfully screened with only a minimal entrance visible from the street. The presence of columns in the loading zones does cause concern as to whether these spaces would meet building regulations. However, the dimensions of the obstructions are limited and therefore likely to have limited impact on access.
- 9.7.11 Additionally, living rooms and bedrooms are angled away from the North Circular Road to assist with mitigating noise and pollution.

Scale, height and massing

- 9.7.12 Policy D9 of the London Plan states that boroughs should determine through their local plan if there are locations where tall buildings may be appropriate and proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Tall buildings should only be developed in locations that are identified as suitable in Development Plans.
- 9.7.13 The proposal is between 6 and 7 storeys (due to the semi-basement in block B). This is not classed as a tall building under the definition provided in the London plan (Policy D9 supporting text), but it is notably taller than the surrounding buildings, which are predominantly 2-3 storeys.
- 9.7.14 However, the development would be sited alongside the North Circular Road, which is a very wide and important route for London. It is also on a corner, which traditionally have buildings that deviate from the pattern of the street. There is therefore justification for a building that responds to the scale and importance of this infrastructure. Furthermore, the increase in height allows a transition from the small-scale character

and grain of Palmerston Crescent to the more urban forms along the North Circular Road.

- 9.7.15 An effort has been made to step the massing down to the existing properties on Palmerston Road. This has been achieved with some success, and while additional refinement could have resulted in the grain better matching the existing street, (through articulation of the façade), the result is acceptable.
- 9.7.16 Whilst a slightly lower building would have been preferred (by 1 storey), the use of setbacks, stepped massing and material changes make the proposed response acceptable in design terms.
- 9.7.17 Furthermore, the Design Review Panel had no objections to the proposed density, nor the inclusion of some built elements at 4-5 storeys.
- 9.7.18 It is therefore considered that the overall height at 6/7 storeys would provide a distinct building along the North Circular Road and the provision of two blocks and various steps in height assist in reducing the massing and linking back to the existing dwelling houses at Palmerston Crescent.

Articulation and Materials

- 9.7.17 As well as the importance of height differentiations and carefully varied massing in the Development, high-quality architectural articulation, materiality and elevational treatment is essential. The architectural approach can help integrate a development into its context through careful use of articulation, proportions, materials and elevational treatment, helping to give a building an identity. As such, this element of the proposal has been the subject of significant discussion between the Council and the applicants during pre-application stage and during the live submission, resulting in refinements to the design.
- 9.7.18 The elevational design is of a contemporary approach and considered neat in general, however, design revisions and choice of materials were discussed to improve the window proportions and better link the design to the surrounding Victorian context. The fenestration sizes are heavily constrained by Building Regulations and the internal layout; however, an effort has been made to maintain the sizes and proportions of the neighbouring buildings. Furthermore, the stepped three storey element assists to maintain the bay rhythm and provide a transition to tie into the adjacent Victorian character, which is deemed acceptable
- 9.7.19 Furthermore, the use of brick is supported, and a revised colour incorporating yellow or red brick was considered appropriate to satisfactorily integrate with the surrounding character and to fare well alongside the pollution of the North Circular Road. This matter was raised by both the Design Review Panel and the Council's Urban Design Officer. Additionally, full brick reveals (1 full brick length) were requested by the Urban Design Officer to improve the relatively simple design and enhance the curve, which is a positive feature to provide a distinct and positive character. All details have been sought as revisions, however where applicable, are recommended to be secured by an appropriate condition to ensure an acceptable overall design, should the scheme be granted.
- 9.7.20 Further clarification was sought with the agent regarding colour of the entrance canopies. However, the agent has confirmed that the canopies are pale bronze, which is deemed more muted to better link in with the surrounding character.

- 9.7.21 Additionally, officers were supportive of the proposed zinc cladding to serve the upper storeys of both blocks, which would add a contemporary contrast to the traditional brickwork and assist in breaking up the elevations.
- 9.7.22 The proposed balconies featured integrated planning, which is supported in design terms, however further details were required to confirm whether the balconies were custom-made. A product specification was submitted, which confirmed how the structures would be integrated into the façade, which is deemed acceptable.
- 9.7.23 The details of the acoustic fence have not been submitted, however could be secured by an appropriate condition. The Urban Design Officer has stated that an acoustic fence should not be positioned along the boundary with no. 106 Palmerston Crescent as it would be too imposing. It has been suggested that a lower fence/trellis should be provided here to improve the relationship. Furthermore, an acoustic fence of a decorative option should also be provided along the rear of block A.
- 9.7.24 Officers therefore conclude that the proposal would result in a well-designed scheme on a challenging site, which would enhance the public realm, whilst making a meaningful contribution towards the Borough's housing targets.

9.8 Impact on Heritage Assets

- 9.8.1 There is a statutory duty on decision makers to ensure the special interest of a listed building is properly considered as a material consideration when determining an application affecting its special interest or setting. The nearest heritage assets (designated and non-designated), which are located within the vicinity of the Application Site include the 16th century Broomfield Park and Broomfield House (Grade II*). The Park contained a house, now in a near-ruined state after fire damage (along with the east wall with attached garden house and stable block), and set among a group of other listed structures (most at Grade II) and within its historic garden and parkland, now a public park, registered at Grade II. The boundaries of the Lakes Estate Conservation Area is also situated to the north of the application site.
- 9.8.2 In respect of listed buildings, the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 requires that all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The Act places a statutory duty on decision makers to ensure the special interest of a listed building is properly taken into account as a material consideration when determining an application affecting its special interest or setting. If harm is identified, it should be given considerable importance and weight in any planning balance. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 9, refer to setting. Setting is defined in the NPPF glossary as "*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*".
- 9.8.3 The Revised NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be

archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Chapter 16 of the Revised NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. It also encourages LPAs to take account of a non-designated heritage asset in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm.

- 9.8.4 It is concluded that the proposed building is not identified as a tall building given its maximum six storeys in height (seven with basement) and thus would not give rise to any views to harm the special character, or setting of the Councils heritage assets, or Conservation Areas. The Councils Conservation Officer has raised no objections to the proposed development, having regard to the guidance contained within the NPPF, the Planning Listed Buildings and Conservation Areas Act (1990), the Historic Environment Good Practice Advice in Planning Note 3-The Setting of Heritage Assets (2017) alongside policies HC1 of the London Plan, CP31 of the Core Strategy and DMD37 and DMD44 of the London Plan and the Council's Heritage Strategy 2019-2024 (July 2019).

9.9 Neighbouring Amenity Considerations

- 9.9.1 London Plan Policy D6 states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Meanwhile, at a local level, Policy CP30 of the Core Strategy seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Secondly, policies DMD6 and DMD8 of the Development Management Document seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

BRE Guidance - Daylight and Sunlight to Existing Buildings:

- 9.9.2 In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.
- 9.9.3 BRE Guidelines paragraph 1.1 states: "People expect good natural lighting in their homes and in a wide range of non-habitable buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by". Paragraph 1.6 states: "The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...".

Sunlight/Daylight and Outlook

- 9.9.4 The submitted Sunlight/Daylight Assessment (May 2023) includes an assessment of daylight/sunlight and overshadowing to neighbouring windows, gardens, and open spaces. The guidance outline three detailed methods for calculating daylight: the Vertical Sky Component (VSC) and Daylight

Distribution. The properties considered were 89, 104 and 106 Palmerston Crescent.

- 9.9.5 The Assessment concludes that the proposed development would have a relatively low impact on the light receivable by its neighbouring properties. Non-compliance with the BRE recommendations is limited to the daylight or sunlight tests in respect of windows 12, 13, 26, 27 & 35 and garden 1 at 106 Palmerston Crescent and windows 40, 48 & 49 at 104 Palmerston Crescent.
- 9.9.6 The NPPG states that developments should maintain acceptable living standards and that site location is a relevant factor when considering sunlight/daylight. Furthermore, the NPPF states that authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."
- 9.9.7 It is noted that there are some rooms which do not meet the recommendations, however given the overall high level of compliance with BRE recommendations, urban location and that there are other sources of light to the rooms affected, on balance the deviations are considered acceptable to provide acceptable living conditions.
- 9.9.8 It is noted that the windows facing the site at 106 Palmerston Crescent do serve rooms which are likely to be significantly impacted by the proposals, particularly as they are located north of the development site. The second-floor front window serves a kitchen (top floor flat). Outlook would be impacted, as would sunlight, although the latter would be limited due to the relative heights of the two buildings. This is considered acceptable, given the small size of this room and therefore it being unlikely to be used for amenity purposes.
- 9.9.9 The rearward window on the first floor is more concerning. This is a secondary window serving the living area of the first floor flat of 106 Palmerston Crescent. The living area is big enough to accommodate a dining area (it is likely that the habitable room on the front is used as a bedroom) and light would therefore be reduced. Officers consider that the proposed development would significantly reduce light serving living space, which is demonstrated within the findings of the Daylight/Sunlight report. However, on balance, it is considered that the presence of three additional windows to serve this room would significantly mitigate any loss irrespective of their north facing orientation. A similar issue is identified to the ground floor flat, which features an additional two windows to the flank elevation thus the impact would be increased; however, on balance, officers consider that any loss of light would be minimised by virtue of the additional windows serving the existing ground floor flat and the separation distance of approximately 2 metres from the common boundary, which was advised by the Design Review Panel.
- 9.9.10 The Daylight/Sunlight report also considers amenity space serving adjacent properties. The results show that for gardens 2 & 3, 63% or more of the area of each amenity space would receive at least two hours of sunlight on 21st March. This is better than the BRE recommendation which states that at least 50% of any garden or amenity area should receive at least two hours of sunlight on the 21st March. Garden 1 achieves 2 hours of sunlight to 40% of its area which is marginally short of the BRE recommendation which states that at least 50% of any garden or amenity area should receive at least two hours of sunlight on the 21st March, however such deviations are not unusual within an urban context and thus, on balance, the shortfall; is deemed acceptable.

Privacy and Overlooking

- 9.9.11 Objections have been received in respect of privacy impacts.
- 9.9.12 Policy D6 of the London Plan states that development proposals should provide sufficient daylight and sunlight to new and surrounding housing.
- 9.9.13 The Mayor of London's Housing SPG does not support adhering rigidly to visual separation measures as they can limit the variety of urban spaces and housing types in the city. Standard 28 of the Mayor of London's Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 9.9.14 At a local level, Policies DMD6 and DMD8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Additionally, policies DMD6 and DMD8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment. Policy DMD10 is silent on distancing standards for this type of relationship but requiring that development would not compromise adjoining sites.
- 9.9.15 The Site is adjacent to the North Circular (A406) and within proximity to a Local Centre and is considered urban in character. Whilst the development would be marginally larger and taller than the existing buildings, it would not be untypical of buildings located in urban locations on main transport routes within the Borough.
- 9.9.16 The site is located at the end of Palmerston Crescent at the turning head and adjacent to the North Circular Road. The nearest residential properties are therefore no's 104 and 106 Palmerston Crescent, which abut the site to the north and the new-build terrace staggered opposite, no's 85, 87 and 89 Palmerston Crescent. Any properties sited on the opposite side of the North Circular are afforded suitable mitigation by virtue of the separation provided by the intervening highway.
- 9.9.17 Block A is sited adjacent to the pair of properties at 104 and 106 Palmerston Crescent with a maintained building line to the front and approximately 3 metre separation from the flank elevation of no. 106. The rear building line is approximately 2m short of the rear projection serving no. 106.
- 9.9.18 It is therefore considered that views would be predominantly towards the street scene at Palmerston Crescent, or the amenity space serving the development itself. The maintained building line would therefore minimise any potential for overlooking and dominance of neighbouring properties at 85-89 Palmerston Crescent and any views would thereby be akin to those achieved within the street scene, having regard to policies DMD8 and DMD10 of the DMD.
- 9.9.19 The relationship with the flats serving no. 106 has been discussed with reference to the Sunlight/Daylight Assessment above, however full consideration must be afforded to the treatment of flank elevations. Although a separation distance to the flank elevation of this property is consistent with the adjoining street context, this is not sufficient separation for habitable room windows. Properties on the remainder of the street would have been built with occupants already aware of the relationship to neighbours. This is a new build and therefore the design needs to respond to the existing context. As a result

of the above, it is considered that all north facing windows to serve the proposed development should be frosted and fixed closed to a minimum of 1.8m in height. The applicant has submitted revised plans to clarify the windows, and this would also be secured by an appropriate planning condition.

- 9.9.20 Having regard to Block B, this has been oriented with a frontage to the North Circular and subsequently the windows would be predominantly towards the North Circular and to the amenity space and beyond to the New River, which is deemed an acceptable relationship. Furthermore, all north facing windows could again be conditioned to contain obscured glazing as these are secondary/non-habitable rooms. There is a separation of approximately 20 metres to the common boundary with no. 106, however as the windows serve secondary/non-habitable windows, it would further prevent the potential for overlooking to the private amenity space serving these flats, having regard to policies DMD8 and DMD10 of the DMD.
- 9.9.21 The proposed distances between existing and proposed homes are thus considered proportionate, within an urban setting. A change in the relationship between the existing homes would take place, which is typical of managed change in an urban location, and not considered significant enough for the development not to be supported.
- 9.9.22 It is therefore concluded that subject to appropriate conditions, requiring full details of the proposed flank windows, screening and boundary treatment throughout the Site, the Proposed Development is considered acceptable in terms of privacy, overlooking and/or outlook, having regard to policies DMD6, DMD8 and DMD10 of the Development Management Document, policy D6 of the London Plan and the information contained within the Mayor of London's Housing SPG.

Noise and Disturbance

- 9.9.23 Guidance relevant for the assessment of noise affecting new developments is given in the February 2019 National Planning Policy Framework (NPPF). Paragraph 180 sets out that that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to a) 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life'.
- 9.9.24 Additionally, at a regional level, Policy D14 of the London Plan sets out that in order to reduce, manage and mitigate noise to improve health and quality of life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. At a local level policy DMD68 of the Development Management Document and CP32 of the Core Strategy are also relevant.
- 9.9.25 The proposed residential development is consistent with the existing prevailing mix of uses in the area and it is therefore unlikely that any unacceptable levels of noise would be generated as result of the residential element of the development
- 9.9.26 Moreover, a larger concern is regarding the siting adjacent to the busy North Circular Road (A406). An Acoustic Report was submitted as part of the

application package and the Environmental Health officer has assessed the submitted details and concluded that appropriate condition for sound insulation could be attached to improve the residential environment and protect residential amenities from noise and disturbance.

- 9.9.27 With respect to occupier amenity, it is recognised that most developments in urban areas will be subject to noise levels above the BS8233 recommended levels for balconies. The development has also incorporated suitable shared amenity space at ground floor level to the rear of the site, and thus this would provide alternatives, where required.
- 9.9.28 It is therefore concluded that the proposed development is considered acceptable in relation to noise levels both internally, and externally in private amenity areas, having regard to policies DMD68 of the Development Management Document, CP32 of the Core Strategy and D14 of the London Plan as well as the guidance contained within the NPPF.

Light Pollution

- 9.9.29 It is recognised that there is the potential for some level of light pollution arising from the development. Whilst it is acknowledged that a large development would likely generate significantly more light than the existing vacant site, or previous use, a planning condition could be attached requiring details of external light spill and light spill to internal communal areas to safeguard against adverse impact. In relation to individual residential units and glare to car users, having regard to policy CP32 of the Core Strategy.

9.10 Transport

- 9.10.1 Policy T1 of the London Plan encourages partnership working in terms of transport and development that reduces the need to travel, especially by car whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy supports measures that encourage shifts to more sustainable modes of transport. London Plan policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 9.10.2 Additionally, Policy T2 of the London Plan requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 9.10.3 Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced so as to provide

everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

- 9.10.4 The application site fronts both the A406 North Circular, which forms part of the TLRN and Palmerston Crescent. It is located at the turning head to the end of Palmerston Crescent
- 9.10.5 The site has a PTAL of 3 which is moderate, being within proximity to Bowes Park and Palmers Green rail stations and Bounds Green and Wood Green underground station to the south. The site is also well served by local bus routes on both the A406 and Green Lanes (A105).
- 9.10.6 Vehicle access to the site would be via a new access at Palmerston Crescent.
- 9.10.7 A Transport Statement (May 2023), prepared by Vectos was submitted as part of the application package.

Car Parking and Access

- 9.10.8 The proposal fronts both the North Circular Road and Palmerston Crescent, with direct building access for pedestrians provided from the North Circular and stepped access for pedestrians is also provided from the North Circular into the site. A pedestrian access is also proposed from Palmerston Crescent whereby all cycle access would be provided.
- 9.10.9 The proposed pedestrian and cycle access into the site is considered acceptable, having regard to policy DMD47 and CP25 of the DMD.
- 9.10.10 The site is proposed to be car free, however, it is noted that three disabled parking spaces would be provided, accessed via Palmerston Crescent. This is considered acceptable, having regard to policy T6.1 of the London Plan.
- 9.10.12 The submitted parking survey concluded that the surveyed area had a maximum parking stress of 100% or close to 100%, noting the surrounding highway network does not have the capacity for additional on-street parking generated by the proposed development.
- 9.10.13 Several residents have objected due to the current parking pressures and the need for a CPZ to improve parking for existing residents. The submitted details confirm that the applicant is willing to provide contributions towards a CPZ on Palmerston Crescent and Elmdale Road as requested by officers. Any contributions towards a CPZ would be consulted on with local stakeholders and would mitigate the impact of the proposed development. Officers are therefore comfortable with the development being car-free if the site is included as a CPZ. On that basis, this would need to be secured via the Section 106 agreement. Additionally, following further discussions with the applicant it was confirmed that electric vehicle charging points would be provided with 20% of the spaces having active facilities and the rest being subject to passive provision. This would be secured by an appropriate condition, alongside appropriate management.

Vehicular Access

- 9.10.14 Vehicular access would be provided by a turning head onto Palmerston Crescent. This would be a significant improvement to the existing area as vehicles are currently double parked at the bottom of the cul-de-sac and refuse arrangements for Palmerston Crescent involve the vehicles reversing down to the bottom of Palmerston Crescent. The proposed turning head would thus improve the current arrangements for refuse and fire tenders.

- 9.10.15 As per the Transport Statement (TS), a turning area would be created on Palmerston Crescent by extending the carriageway to the south and to the boundary of the footway/cycleway provided along the North Circular. The applicant notes that due to the low number of vehicle movements at the southern end of Palmerston Crescent, it is proposed that the turning area would take the form of a shared surface which would provide level access to the footway/cycleway provided along the North Circular.
- 9.10.16 Officers are supportive of intentions to repurpose the existing cycleway. The proposal to provide a turning head in this location is considered suitable in principle.
- 9.10.17 It is noted from drawing No. 216344- 108/PD/A03 Rev B, that part of the site, which is currently a landscaped area, is designated as highway and would be stopped up as part of the development proposals.
- 9.10.18 In accordance with the TfL Healthy Streets TA guidance, a Stage 1 road safety audit (RSA) should be completed at the planning stage for any highway works proposed. It is noted that no Stage 1 RSA has been provided for review, as per TfL guidance.

Delivery and Servicing

- 9.10.19 Vehicle tracking is provided on the submitted drawing no. No. 216344-180/AT/A01. The details demonstrate that a compliant refuse vehicle (in line with LB Enfield Waste and Recycling Storage Planning Guidance) would be able to enter by the proposed turning head to service the site, which is supported.
- 9.10.20 The total number of servicing vehicles associated with the site, as per table 4.3 of the Transport Statement is considered comparable to a site of this size and is supported.
- 9.10.21 Policy T7 of the London, Plan states that a Delivery and Servicing Plan (DSP) should be provided to ensure that proposals facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. However, an appropriate condition could be attached to secure details outlining the delivery and servicing strategy of the site. This is to ensure suitable deliveries and servicing can be undertaken on site, in accordance with policies DMD48 of the DMD and T7 of the London Plan (2021).

Cycle Parking

- 9.10.22 The submitted details indicate that cycle access would be provided from Palmerston Road with step free routes to the long stay cycle parking areas within in each block and short stay cycle parking spaces provided near to the building entrances. Long stay cycle parking area for block A is provided at the upper ground level and the long stay cycle parking area for block B is provided at the lower ground level with a ramp of 1:12 provided down to the cycle parking area.
- 9.10.22 Furthermore, the proposal would provide 65 long stay and 4 short stay cycle spaces, which meet policy requirements and provide an overprovision, which is strongly supported.
- 9.10.23 It is noted that that secure long stay cycle parking and short stay cycle parking would be split conveniently between the two residential blocks, which is supported. However, the access to block B is rather restricted given the multiple doors, narrow doorways (less than 1.2m) and tight corners, which does not comply with the advice contained within Chapter 8 of the London Cycle Design

Standards (LCDS). However, further details pertaining to cycle storage, including door widths, and manoeuvring space could be secured by an appropriate condition, having regard to policies DMD45 of the DMD and T5 of the London Plan.

Travel Plan

9.10.24 As per the submitted Transport Statement, it is noted:

- Due to the scale of the development, an independent Travel Plan (TP) has not been prepared for the associated planning application submission. This approach has been agreed with the highway officer.
- However, the development proposals do include measures to encourage and promote sustainable and active travel and these include:
 - The provision of car-free development; and
 - Provision of cycle parking spaces to London Plan standards.

9.01.25 Notwithstanding the above, a Travel Plan was requested by the highway officers having regard to:

- The moderate PTAL rating in accordance with the London Plan (2021) Policy T4.
- To ensure that measures and targets are in place to encourage and promote sustainable travel to and from the site.
- The TP should be provided in accordance with TfL's latest guidance. However, officers consider that a full residential Travel Plan could be secured by S106, should the scheme be granted. The Applicant would be expected to instruct an independent transportation data collection company to undertake the monitoring survey.

Active Travel Zone (ATZ) Assessment

9.10.26 Section 5 of the Transport Statement provides an Active Travel Zone (ATZ) Assessment, in line with TfL guidance.

9.10.27 The ATZ is considered suitable, notably the information provided in Appendix F and G, detailing key amenities within a 20-minute walking catchment of the site. The ATZ also focuses on four key routes, which are considered suitable and include:

- Route 1 – Palmers Green Station and Morrisons,
- Route 2 – Broomfield School,
- Route 3 – Bowes Park Station, Bounds Green Station, and Bounds Green Group Practice,
- Route 4 – Palmers Green Mosque.

9.10.28 Based on the evidence presented, officers consider that the ATZ is suitable in its assessment.

Trip Generation

9.10.29 In terms of Trip Generation, Section 6 of the TS outlines the anticipated trip generation of the site using survey information obtained via the TRICS database.

9.10.30 Highway officers have raised considerations regarding several parameters:

- Site only in Greater London.
 - As per TRICS Good Practice Guidance, regional selection should not be a major consideration when applying trip rate calculation filtering criteria, whilst TRICS location type appears to be one of the most influential factors in terms of trip generation, and therefore should be one of the main filtering considerations.
- Survey date range between 2014 and 2021.
 - These exceed the recommended previous five-year search window.

9.10.31 However, given that the development would be car free, supported by the extension of the CPZ, the majority of trips would be by other modes than single occupancy car trips. The adjusted multimodal trip rates are therefore supported, as outlined in Table 6.2 of the TS.

9.10.32 Although this assessment is based on Census 2011 data, it is further emphasised that Travel Plan is required to support the application, due to the reliance on sustainable modes of transport to and from the site. Furthermore, an appropriate sustainable transport contribution could be secured by an S106, should the scheme be granted.

Construction Logistics Plan (CLP)

9.10.33 A Construction Logistics Plan is required in accordance with TfL's latest guidance. However, an appropriate condition could be attached outlining the construction logistics strategy and programme of works for the site. This is to ensure suitable construction works can be undertaken on site, without detrimentally impacting the surrounding road network, in line with LB Enfield DMD Policy 48 and the London Plan (2021) Policy T7.

S106 Highway Contributions

9.10.34 In terms of contributions, funds to secure the introduction of a CPZ to Palmerston Crescent and Elmdale Road would be required alongside a sustainable transport contribution.

9.10.35 It is therefore considered that the proposed development is acceptable in terms of its impact on the local transport network, having regard to policies DMD45 and DMD47 of the DMD, CP24, CP25 and CP26 of the Core Strategy and policies T2, T6 & T9 of the London Plan.

9.11 Trees and Landscaping

9.11.1 Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.

9.11.2 At a local level. Policy DMD80 of the Development Management Document stipulates developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation, and reducing the urban heat island effect. Additionally, Policy DMD81 of the Development Management Document refers to landscaping.

9.11.3 The submitted Landscaping Plan outlines various urban greening elements such as the provision of 723 sq.m of amenity space across the site, which includes an informal nature garden and shared space with natural play and communal seating. The landscaping would also secure improvements to the elevation fronting the North Circular Road including a yew hedgerow alongside further tree planting and a well planted communal garden area. This is considered acceptable and would be secured by an appropriate landscaping condition, having regard to policies DMD80 and DMD81 of the DMD.

9.11.4 An Arboricultural Impact Assessment (AIA), prepared by Arborterra, was submitted, which referred to the removal of several Category B, C and U trees on site. The submitted report states that there are a total of 36 trees on site, 9 are Category B, 23 are Category C and 4 are Category U. The proposed development would include the removal of 28 trees; however, most of these trees are Category C or U (24). There are only 4 trees proposed for removal which are identified as Category B. Both the Council and the Design Review Panel sought to retain as many trees as possible to be incorporated within the new development. Various discussions were held throughout the pre application process, and the siting and layout were reconfigured to accommodate the retention of some important trees. This included the most prominent tree on site (T3), which is located to the front boundary and has high amenity value from both Palmerston Crescent and the North Circular Road. The following trees are to be retained:

T3 – Lime (B)

T4 – Yew (C)

T16 – Goat Willow (C)

T17 – Goat Willow (C)

T18 – Sycamore (B)

T19 – Ash (B)

T34 – Ash (B)

T35 – Sycamore (B)

9.11.5 Furthermore, the submitted AIA and Landscaping Scheme confirm that a total of 8 trees would be replanted:

- 2 x *Larix decidua* (European larch, native)
- 3 x *Betula pendula* (silver birch, native)
- 2 x *Crataegus laevigata* 'Crimson Cloud' (midland thorn, cultivar of native species)
- 1 x *Amelanchier arborea* 'Robin Hill' (Juneberry, non-native, nectar rich)

9.11.6 Policy DMD80 of the Development Management Document specifies that all development that would result in the loss of, or harm to trees of significant amenity or biodiversity value should be refused. Additionally, where there are exceptional circumstances to support the removal of such trees, adequate replacements must be provided. Officers therefore consider that the loss of 24 category C and U trees is deemed acceptable given their limited amenity value and the overall loss of 4 Category B trees is deemed acceptable given that the planting of an additional 8 trees within the constrained layout of the site would enable the ability of more trees to survive. Furthermore, the applicant is

proposing a 2.1m high yew hedge and trees to add further greenery and buffer the site from the conditions of the North Circular.

- 9.11.7 The Council's Tree Officer has assessed the submitted details and confirmed that the proposal is deemed acceptable in terms of its potential impacts on the existing trees within the site. It is accepted that this would be necessary to facilitate any form of development in this location. The report demonstrates that the design layout has been informed by the constraints posed by the trees that would be retained within and adjacent to the site boundaries and that they could
- 9.11.8 The Council's Tree Officer has requested that a further condition is attached to secure the submission of a detailed Arboricultural Method Statement (AMS) with Tree Protection Plan to demonstrate that trees would be successfully protected during the site's redevelopment. This would include arboricultural supervision of all sensitive works within the Root Protection Area of retained trees, including the installation of no-dig paths and changes to boundary treatments, and monitoring of the respective phases of the tree protection measures, as has been identified within the submitted AIA.
- 9.11.9 It is therefore considered that subject to appropriate conditions for an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) to demonstrate how the trees would be successfully protected throughout the site's development, a planting plan/schedule and a landscaping specification including a scheme of aftercare and maintenance, the details are considered acceptable in relation to trees and in line with relevant policies including Enfield Policies DMD80 and DMD81 of the Development Management Document and Policy G7 of the London Plan. It is also noted that further landscaping is proposed as part of the development. As such there would be an improvement to the North Circular Road resulting from this and from the gain in trees in terms of visual amenity and biodiversity benefits, having regard to its siting within proximity of the New River.

9.12 Water Resources, Flood Risk and Drainage

- 9.12.1 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal erosion. Whilst the Environment Agency is responsible for developing a new national flood and coastal risk management strategy Lead Local Flood Authorities (LLFA), such as the London Borough of Enfield will have overall responsibility for development of a Local Flood Risk Management Strategy for their area and for 2o-ordinating relevant bodies to manage local flood risks.
- 9.12.2 Policy S112 of the London Plan requires developments to ensure flood risk is minimised and mitigated and that residual risk is addressed. The site is partly located within Flood Zones 2 and 3.
- 9.12.3 Additionally, London Plan Policy S113 relate to sustainable drainage whereby the preference is to reduce surface water discharge from the site to greenfield run off rates.
- 9.12.4 The Council's draft Local Plan sets out the Borough's ambitions in relation to growth until 2036. Policy SUS5: Surface Water Management notes the following overarching aims in relation to drainage and flood risk: All major developments to implement Sustainable Drainage Systems (SuDS) to enable a reduction in peak run-off to greenfield run-off rates for the 1 in 1 year and the 1 in 100-year event (plus climate change allowance); All major developments to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated

to reduce peak flow volumes and rates in line with the requirements of this draft policy approach; All other developments to maximize attenuation levels and achieve greenfield runoff rates where possible or increase the site's impermeable area; Development to be designed to minimise flood risk and include surface water drainage measures to be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality, and safe environments for pedestrian and cyclists; All new outdoor car parking areas and other hard standing surfaces be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so; Living roofs to be incorporated into new development, to help contribute to reducing surface water run-off; and Where installed, SuDS measures be retained and maintained for the lifetime of the development and details of their planned maintenance provided to the Council.

- 9.12.5 Supporting these principles is Development Management Document Policy DMD 61 which requires a drainage strategy to be produced that demonstrates the use of SuDS in line with the London Plan discharge hierarchy. The policy requires the use of SuDS to be maximised with consideration given to their suitability, achieving greenfield run off rates, the SuDS management train and to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value.
- 9.12.6 Alongside the above policy, the Council sets out further advice in its Flood Risk guidance which outline strategies for the mitigation of flood risk, management of surface water including the implementation of Sustainable Urban Drainage Systems (SuDS) on new developments, with allowances for the impact of climate change. The guidance recommends that the relevant documents are i) Preliminary Flood Risk Assessment, ii) Surface Water Management Plan, iii) Strategic Flood Risk Assessment (Levels 1 & 2), iv) Local Flood Risk Management Strategy, and v) Sustainable Drainage Design and Evaluation Guide.
- 9.12.7 Finally, the CIRIA C753 'The SuDS Manual' 2015 includes up-to-date research, industry practice and guidance in relation to delivering appropriate SuDS interventions including information on measures to deliver cost-effective multiple benefits relating to technical design, construction and maintenance of SuDS systems.
- 9.12.8 The proposed development would remove existing landscaping and urbanise a currently vacant site, however Sustainable Drainage measures (SuDS) including green roofs, rain gardens and permeable paving would be incorporated within the design. This is strongly supported by Officers and is considered to be a scheme benefit alongside the urban greening measures proposed at ground floor level including appropriate planting, part green roof, rain gardens and permeable paving. On that basis, an appropriate condition could be attached to secure a detailed SuDs Strategy in accordance with the measures outlined above, having regard to policies DMD61 of the DMD. Additionally, a further condition could be attached to secure details of a green roof. The SuDs officer has no objections to this element of the proposal.
- 9.12.9 The site is not located within a flood zone, or subject to surface water flood risk, however considering the excavation to provide a basement, the applicant was required to submit a Basement Impact Assessment (BIA), which included information obtained from a ground investigation and mitigation measures.
- 9.12.10 The Drainage officer has assessed the submitted details and following the receipt of additional clarification has raised no further objections and is satisfied that the proposed development would not result in ground water flood risk elsewhere, having regard to policies CP28 of the Core Strategy, DMD60 and

DMD61 of the Development Management Document and SI12 and SI13 of the London Plan as well as the guidance contained within the NPPF.

9.13 Environmental Considerations / Climate Change

- 9.13.1 The NPPF maintains the presumption in favour of sustainable development, including environmental sustainability, and requires planning to support the transition to a low carbon future in a changing climate (Para.148). This entails assisting in reducing greenhouse gas emissions, minimising vulnerability, encouraging the reuse of existing resources and supporting renewable and low carbon energy infrastructure.
- 9.13.2 At a Regional level, Policy G1 of the London Plan acknowledges the importance of London's network of green features in the built environment and advocates for them to be protected and enhanced. The Policy notes that green infrastructure 'should be planned, designed and managed in an integrated way to achieve multiple benefits'. Also of relevance is Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.
- 9.13.3 Paragraph 150 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. Meanwhile the London Plan and Enfield Issues and Options Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

Energy and Sustainability

- 9.13.4 Currently, all residential schemes are required to achieve net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.
- 9.13.5 The NPPF (Para 153) requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping.
- 9.13.6 Policy SI2 of the London Plan sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development). Meanwhile Policy DMD55 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 9.13.7 An Energy and Sustainability Statement, (March 2023), prepared by XC02 was submitted as part of the application package. This provides an overview of the sustainability strategies for the proposed development. The documents demonstrate how the proposal has sought to meet London Plan requirements and relevant Council policies.
- 9.13.8 The document concludes that the proposed development is expected to reduce on-site regulated carbon emissions by 90.2% against a Part L 2021 regulations and thus complies with the 35% reduction required by the London Plan. This

could be secured by an appropriate condition alongside requirements of BREEAM 'Excellent' and thus is deemed acceptable.

9.13.9 The development provides key sustainability measures as follows:

- The re-use of previously developed land with an effective layout and scale;
- A fabric first approach through the specification of high-performance fabric and glazing to minimise heat losses;
- Efficient design of the proposed massing openings and internal layouts so that habitable spaces across the site benefit from adequate daylight and sunlight levels;
- Connecting to the local district heating network for efficient supply of energy to the development, having regard to policy DMD52 of the DMD;
- Incorporating of renewable technologies for further CO₂ savings, having regard to policy DMD53 of the DMD;
- Specification of water saving fixtures and fittings to improve water efficiency, having regard to policy DMD58 of the DMD;
- Provision of landscaped areas and green roof to enhance the biodiversity at the site, having regard to policies DMD81 of the DMD and CP36 of the Core Strategy;
- Site-specific SuDS measures including green roofs, permeable paving system and rain gardens to reduce surface water run-off and mitigate flood risk, in line with Core Policy 28;
- The lighting design of the proposed development will follow the recommendations of the Institution of Lighting Engineers' Guidance Notes for the Reduction of Obtrusive Light (2005), to minimise light pollution;
- Air pollution risks from construction and demolition on site will be minimised, having regard to policies CP32 of the Core Strategy and DMD64 and DMD65 of the DMD;
- Adequate noise attenuation measures will be incorporated to ensure noise levels are within acceptable limits, having regard to policies CP32 of the Core Strategy and DMD68 of the DMD; and
- The external lighting strategy shall ensure minimal disturbance to wildlife, having regard to policies CP32 of the Core Strategy and DMD68 of the DMD.

9.13.10 In regard to sustainability, it is considered that appropriate conditions could be attached to secure matters raised within the submitted report such as BREAAM, water consumption and site waste management plan.

9.13.11 The energy technologies to be implemented within the development are photovoltaic panels, which would reduce CO₂ emissions. Other technologies, such as biomass, ground/water source heat pumps, air source heat pumps, wind energy and solar thermal panels were discounted, as outlined within the submitted Energy Statement.

9.13.12 The submitted Energy Statement also outlines that the application site is located within an area with district heating, managed by the council-owned company Energetik, with the development expected to connect to the District Energy Network (DEN) once the network is extended in 2028. Energetic have therefore advised that as an interim measure, the development delivers a communal heating system to Energetic's specification, but the heat should initially drive from small-scale local communal gas boilers, which would be operated by Energetik. The district heating network is expected to provide heating and hot water to all uses on site. The network connection is proposed in accordance with the requirements of Policy SI3 of the London Plan and policy DMD52 of the Development Management Document alongside Enfield's adopted Decentralised Energy Network Technical Specification SPD, which require major development to connect to existing heat networks unless there

are feasibility or viability reasons not to. Further S106 planning obligations could be secured in line with the Council's adopted policies and by appropriate conditions.

- 9.13.13 The proposed development complies with the London Plan requirements of a 35% reduction in emissions. However, to achieve 'zero carbon' for the residential portion of the scheme, 3.5 tonnes per annum of regulated CO₂, equivalent to 106.3 tonnes over 30 years should be offset offsite. This equates to a total offset payment amount of £10,101, which could be secured within an S106 agreement.

Ecology and Biodiversity

- 9.13.14 The NPPF (Para.170) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. At a regional level, policy GG2 of the London Plan requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy G14 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough.
- 9.13.15 Within a more strategic context the Environment Bill, published by the UK Government in October 2019 includes proposals to make biodiversity net gain (BNG) a mandatory requirement within the planning system in England. Should the Environment Bill be passed in a form similar to that introduced in October 2019, developments such as this will be required to achieve a 10% gain in biodiversity units relative to the development site's baseline biodiversity.
- 9.13.16 The site is adjacent to the North Circular (A406) and currently considered of moderate biodiversity and ecological value given its urban siting. However, the site contains existing vegetation within and to the periphery of the site and having regard to its siting within proximity to the New River. The total site area is approximately 1697.2 sq. m with existing habitats including modified grassland, bramble scrub and urban tree
- 9.13.17 The submitted Preliminary Ecological Appraisal (May 2023) includes a desk study and two site surveys (2021 and 2023). It concludes that no signs or evidence of protected, priority or rare species were discovered, and further ecological surveys or mitigation were therefore deemed unnecessary. The site is thus unlikely to support such species, though occasional foraging by low numbers of common bat species is likely during summer months, low density nesting by common garden birds is possible and occasional foraging by widespread protected and UK priority birds such as fieldfare, house sparrow and starling etc. is also likely. Occasional use by low numbers of hedgehogs (UK priority species) is also possible. However, to minimise any residual risk of impact, the recommendations for birds, hedgehogs, amphibians and bats included in the report should be followed.
- 9.13.18 The proposed development would not result in the disturbance of any existing habitats. In addition, the scheme has been designed with the protection and enhancement of the habitat and biodiversity within and adjacent to the site, in mind. To that end planting has been selected to maximise biodiversity value and features native or near native species which will help to reinforce the

established nature of the adjoining New River Metropolitan Sites of Importance for Nature Conservation (SINC).

9.13.19 The scheme incorporates wildlife planting, a green roof, protection to retained trees and provision of bird and bat boxes and hedgehog to contribute to improved biodiversity at the site. Additionally, it refers to various mitigation measures to protect existing habitats, birds and bats and concludes that the existing trees and buildings on site were deemed to provide low potential to support roosting bats. The recommendations for biodiversity improvements included a Biodiverse Green Roof, new native hedgerows and other wildlife attracting soft landscaping.

9.13.20 In addition to the soft landscaping the proposal would include new habitat bricks for local bats, bees, and birds. The bricks would be installed into the new building walls above a height of 5m and include:

- 8 x Istock Swift Bricks (or similar if out-of-stock).
- 6 x Istock Bat Brick Type C (or similar if out-of-stock)
- 4 x Vivara pro sparrow terrace (or similar if out-of-stock)
- 10 x Bee bricks.

9.13.21 The swift bricks would be mounted together separated by 0.5m to create a potential colony of nesting birds. All bird boxes would be positioned facing a northerly direction and bat bricks and bee bricks facing a southerly direction.

9.13.22 Biodiversity enhancement to provide net gain is required in accordance with national planning policy (NPPF, 2021). The applicant has referenced Natural England's Biodiversity Metric to consider whether there is a net gain/loss at the site. The assessment was determined and supported by the aid of proposed landscape designs, area calculations, Arboricultural Impact Assessment, and the Preliminary Ecological Appraisal. The Preliminary Ecological Appraisal included botanical and habitat assessments by an experienced Ecologist at a suitable time of year. The total site area is 1697.2m² with existing habitats including modified grassland, bramble scrub and urban trees. The proposed habitats include sealed surfaces (buildings & hardstanding), a Biodiverse Green Roof, urban trees (new plantings and some retained), wildflower meadow, ornamental plantings, and new hedgerow habitat. The submitted BNG calculation indicated a loss in habitat units of -3.57 and gain in hedgerow units of 5.97, which is thus deemed acceptable.

9.13.23 Additionally, the proposed development has specified greenery to achieve an Urban Greening Factor of more than 0.48, which surpasses the weighted green coverage recommendation of 40% of the total site area, for residential developments.

9.13.24 Using the Defra 3.1 Metric to calculate habitat losses or gains, the Biodiversity Net Gain Report arrives at a 5.97% increase in Hedgerow Units for the site, a total of 44 sq.m across the site, including a frontage with the North Circular and the landscaping strategy introduces 8 new trees, 66 sq. m of amenity grass, 554 sq.m of semi natural vegetation (existing trees and proposed meadow area) and 16 sq.m of flower rich perennial planting at the access to Palmerston Crescent and across the site. The calculation factors the loss of habitat units. Based on these calculations, the development results in a net gain in biodiversity, in line with policy.

9.13.25 It is therefore concluded that appropriate conditions could be attached to secure biodiversity enhancements at the site, having regard to the requirements outlined in the NPPF (Para 170), policies GG2 and G6 of the London Plan and policy CP36 of the Core Strategy.

9.14 Site Waste Management

- 9.14.1 The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. Policy SI7 of the London Plan encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste. At a local level, policy CP22 (Delivering Sustainable Waste Management) of the Core Strategy sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.
- 9.14.2 The submitted Energy and Sustainability Statement (March 2023) prepared by XC02 was submitted as part of the application. It refers to Responsible Sourcing, Healthy Materials, Embodies Carbon, Circular Economy, Operational Waste and Construction Waste. The re-use and recycling of demolition, excavation and construction waste is supported in policy terms to minimise environmental impact. It is therefore considered appropriate to attach appropriate conditions pertaining to a Green Procurement and Construction Plan and site waste management plan to ensure that no significant adverse effects in respect to waste management would arise because of the development, having regard to Policies DMD49 and DMD57 of the Development Management Document, CP22 of the Core Strategy, and S17 of the London Plan.

9.15 Contaminated Land

- 9.15.1 The site is currently vacant, however having previously served housing whilst being retained for future highway expansion work.
- 9.15.2 The Councils Environmental Health Officer has considered the submitted details and advised that appropriate conditions are attached to ensure that contamination is not present at the site including a remediation strategy and verification report, having regard to policy DMD66 of the DMD and the relevant guidance including Paragraph 170 of the NPPF.

9.16 Air Quality / Pollution

- 9.16.1 Policy SI1 of the London Plan set out the requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 9.16.2 At a national level, the NPPF (Para.103) recognises that development proposals which directly address transport issues and promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 9.16.3 Finally, at a local level, policy DMD65 of the Development Management Document requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 9.16.4 Given the proposed Energy Strategy and inclusion of electric car charging points the proposed development is considered unlikely to result in a negative environmental impact, including in terms of air quality/pollution and/or noise.

9.16.5 Additionally, the Council's Environmental Health Officer has considered the submitted Air Quality Assessment (May 2023) and questioned some of the details contained within the report.

9.16.6 Paragraph 6.7 of the air quality assessment states:

'The predicted concentrations shown in Table 6.8 indicate that there were exceedances of the NO₂ AQO within the modelling area at the ground floor (1.5 m) and first floor (4.5 m). The locations where NO₂ AQO exceedances are predicted are: • R1A, R2A, and RA3 in Block A and R16A in Block B at the ground floor. • R10, R11B, R12B, R1 B, and R1 B in Block A's first floor.'

9.16.7 Paragraph 6.10 further states:

'Based on the exceedances at the receptor locations highlighted above, the site requires mitigation measures to ensure that future site users are protected from elevated NO₂ concentrations. As a result, all units on the ground floor should be implemented with Mechanical Ventilation with Heat Recovery (MVHR) systems and NO_x filters to reduce NO₂ emissions to levels below the AQO within the building.'

9.16.8 This is followed by paragraph 6.12:

'It should also be noted that background NO₂ levels are likely to be lower at elevated heights due to increased distance from emission sources, such as the local road network. This is predicted at all onsite receptor locations within the model. Therefore, predicted concentrations at heights above ground floor level are considered to be acceptable in regard to pollutant exposure across all offsite receptor locations and have not been assessed further.'

9.16.9 It is noted within paragraph 6.7 of the Assessment that the first-floor properties identified in Block A should also have mechanical ventilation as they are in an exceedance area for nitrogen dioxide, but this is not stated in paragraph 6.10. Despite the statement in para. 6.12, further clarification is requested to confirm why these flats are not recommended for mechanical ventilation.

9.16.10 Furthermore, the Environmental Health officer has requested a Section 106 contribution would also be expected from the developer towards the Council's air quality monitoring programme, alongside appropriate conditions pertaining to non-road mobile machinery, sound insulation, acoustic report (mechanical plant) and construction management plan in the interests of good air quality and noise and disturbance to future and neighbouring occupiers, having regard to policies DMD65 and DMD68 of the DMD, CP32 of the Core Strategy and SI1 of the London Plan.

9.17 Health

9.17.1 The NCAAP (2014) states that NC Policy 5 'Provision of Modern Healthcare Facilities' states that development of 10 residential units or more will be expected to contribute towards the provision of health facilities within the NCAAP area, and financial contributions will be calculated using the NHS Healthy Urban Development Unit Model.

9.17.2 The applicant has submitted a Health Impact Assessment, dated May 2023. This assesses the extent to which the proposals address four health related themes of healthy housing, active travel, healthy environment, and vibrant neighbourhoods. This assessment concludes that the proposed development achieves key policy requirements and standards, delivering a scheme which is considered a 'healthy' development that can positively influence health and wellbeing.

9.17.3 Officers consider that the proposed development would result in the provision of good quality housing, additional local spending by residents of the new development, and the provision of private amenity space and open space. As the proposals would provide good quality housing with access to amenity space and an improved neighbourhood environment, positive effects on health are anticipated regarding access to open space, crime reduction and community safety. Taking the above into consideration, overall, it is considered that some positive environmental effects on socio-economics would arise as a result of the development. Furthermore, it is not considered there would be any significant effects on health occurring as a result of the development.

9.18 Fire Strategy

9.18.1 Policy D12 of the requires developments to be designed to incorporate appropriate features to reduce the risk to life and Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users. A Fire Safety Strategy (May 2023) produced by a third party suitably qualified assessor, has been submitted as part of the application which satisfies policy D12 of the London Plan.

9.18.2 The statement makes references to means of warning and escape, internal fire spread, external fire spread and access and facilities for the fire service. Policies D5 and D12 of the London Plan refer to specific considerations, which have been considered as part of this document. These include evacuation lifts, building construction method, means of escape, features which reduce the risk to life, access for fire service personnel and equipment and record keeping. The Fire Safety Strategy will form part of the approved documents.

9.19 Section 106 and Community Infrastructure Levy

9.19.1 Both Enfield CIL and the Mayor of London CIL2 would be payable on this scheme to support the development of appropriate infrastructure. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved. Based on the Mayor and Council's Charging Schedules, the total level of CIL is expected to be in the order of £1,765,181 (based on current details of 17,275 sq.m floorspace, certain scheme assumptions, indexation assumptions and inclusion of relief).

Section 106 Heads of Terms

9.19.2 The NPPF requires that planning obligations must be:

- (a) Necessary to make the development acceptable in planning terms;
- (b) Directly related to the development; and,
- (c) Fairly and reasonably related in scale and kind to the development.

9.19.3 Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.

9.19.4 Core Policy 46 seeks to ensure that development proposals make adequate provision for both infrastructure and community facilities that directly relate to the development. Developers will be expected to meet the full costs of facilities required as a consequence of development and to contribute to resolving

deficiencies where there would be made worse by the development. The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. Additionally, Policy S1 of the London Plan refers to social infrastructure and seeks to ensure that the diverse needs of London's communities are met, including health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities.

9.10.5 A Section 106 would be required for the scheme and will comprise the following Heads of Terms:

- Affordable Housing
Provision of no less than 50% affordable housing (by habitable room). Tenure mix secured.
A means to control and monitor the delivery and management of affordable housing
- Travel Plan
Sustainable Transport Contribution
Exempt future resident's eligibility for local parking permits, and expand CPZ if needed
- Employment and Skills Strategy
- DEN connection
- Carbon Offset Payment
- Monitoring ('Be Seen' – GLA Energy Monitoring Portal)
- Air quality monitoring fee
- Monitoring Fees

9.20 Public Sector Equalities Duty

9.20.1 In line with the Public Sector Equality Duty the council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions including decision making on planning applications. These considerations include Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9.20.2 The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above. In making this recommendation, due regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, marriage / civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

9.20.3 When determining the planning application (and thereby accounting for the representations resulting from public consultation), the Council has considered the potential effects of the proposed development on those with protected characteristics as defined under the Equality Act 2010. In doing this, the Council has had due regard to equality considerations and attribute appropriate weight to such considerations. In providing the recommendation to Members

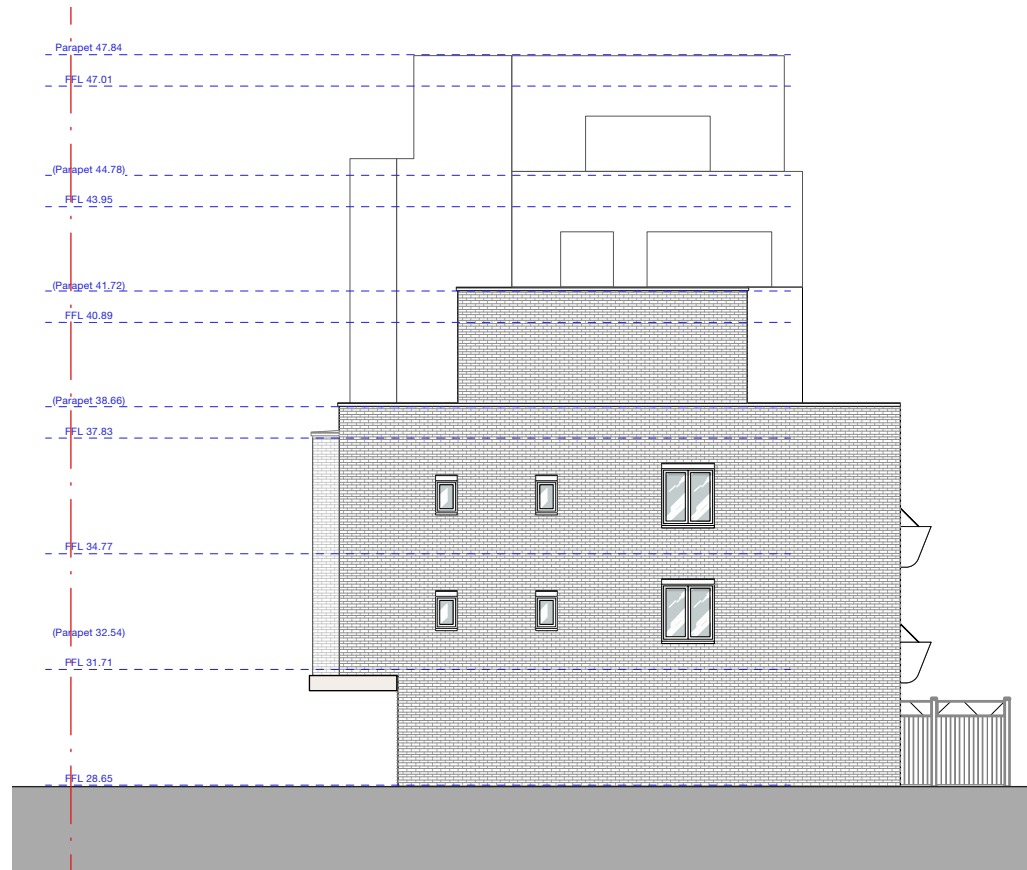
that planning consent should be granted, officers have considered equalities impacts in the balance, alongside the benefits arising from the proposed development. The Council has also considered appropriate mitigation to minimise the potential effects of the proposed development on those with protected characteristics.

- 9.20.4 There are no statutory or regulatory requirements for the form or content of an equalities assessment. The scale and significance of such impacts cannot always be quantified, and it is common to address this through descriptive analysis of impacts and identifying whether such impacts are adverse or beneficial. The key elements of the Proposed Development which have an impact that could result in an equalities effect include the design and physical characteristics of the proposals subject to the planning application. Officers do not consider there would be a disproportionate equalities effect.
- 9.20.5 In line with the Human Rights Act 1998, it is unlawful for a public authority to act in a way which is incompatible with a Convention right, as per the European Convention on Human Rights. The human rights impact has been considered, with particular reference to Article 1 of the First Protocol (Protection of property), Article 8 (Right to respect for private and family life) and Article 14 (Prohibition of discrimination) of the Convention.
- 9.20.6 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest. The recommendation is considered appropriate in upholding the council's adopted and emerging policies and is not outweighed by any engaged rights.

10. Conclusion

- 10.1 The proposed site is a brownfield site in a sustainable location within close proximity to district and local centres as outlined within the adopted North Circular Area Action Plan. As a previously developed site which is currently underutilised, the proposed development for housing is fully supported by policies for boosting the supply of homes (NPPF para 59, London Plan GG2 and H1 as well as the aims and intentions outlined with the North Circular Area Action Plan.
- 10.2 The Site has a PTAL rating of 3 (moderate) given its siting within proximity to underground and overground links, and with several bus stops within the vicinity of the site. The well-connected site aligns with Mayoral and emerging local ambitions of moving towards providing well designed residential led developments in sustainable locations.
- 10.3 The delivery of 31 new homes will optimise the use of a sustainably located brownfield site and make an important contribution towards meeting both the Council's and the Mayor's annualised housing targets. The provision of 50% affordable housing would meaningfully contribute towards local and strategic housing need and targets. Additionally, the site would provide improved landscaping and biodiversity opportunities to support the residential land use and immediate surrounding area.
- 10.4 Optimisation of development on the site has also considered the requirements for residential space standards, private external amenity, play space and creating mixed and inclusive communities through the provision of wheelchair accessible and adaptable units, public transport accessibility and movement, impact on residential amenity, townscape and character and the adequacy of existing social infrastructure.

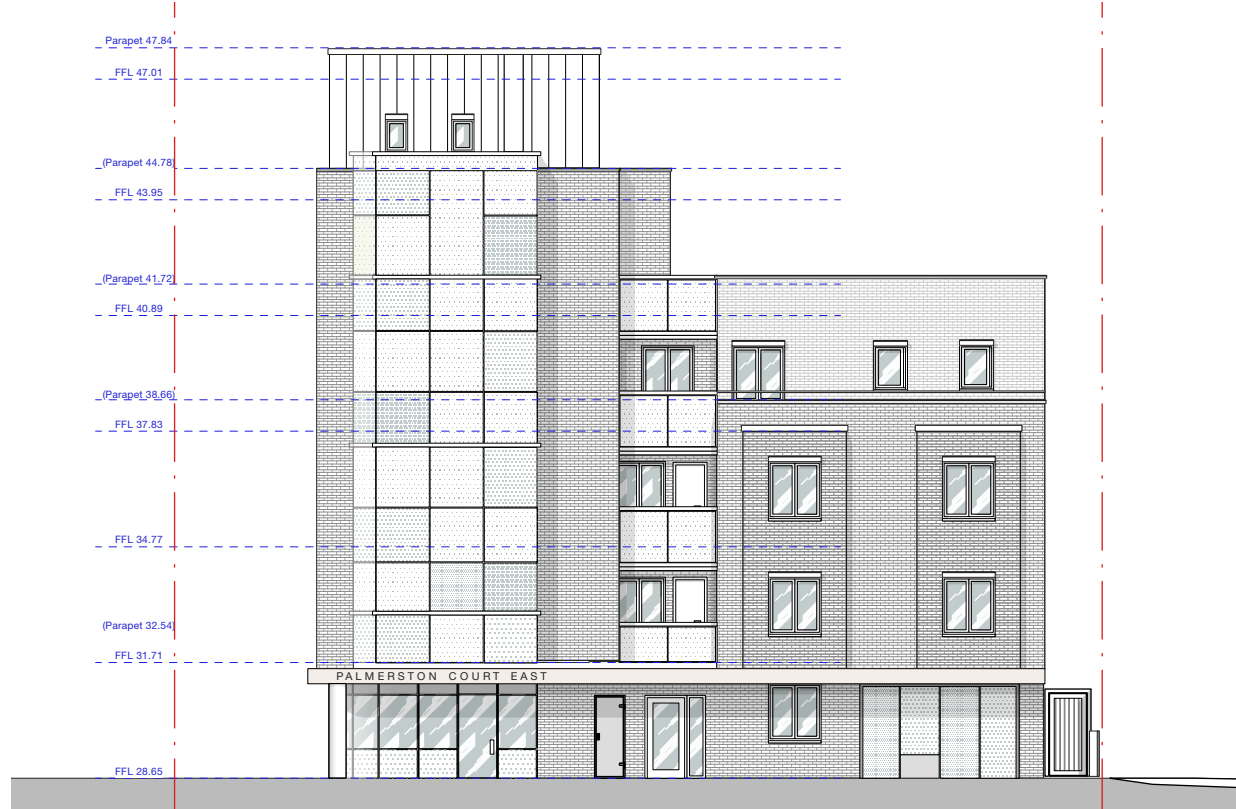
- 10.5 As a result of the above characteristics the proposal is considered to accord with the development plan and as such it benefits from the statutory presumption in favour of the development plan as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004. This policy support for the proposal is further reinforced by its compliance with important other material planning considerations, such as the NPPF and the London Plan to which, for reasons explained elsewhere in this report, significant weight has been attached. Based on the above, it is considered that, on balance, the proposed development would align with relevant local, regional and national policy and as such is recommended for approval.



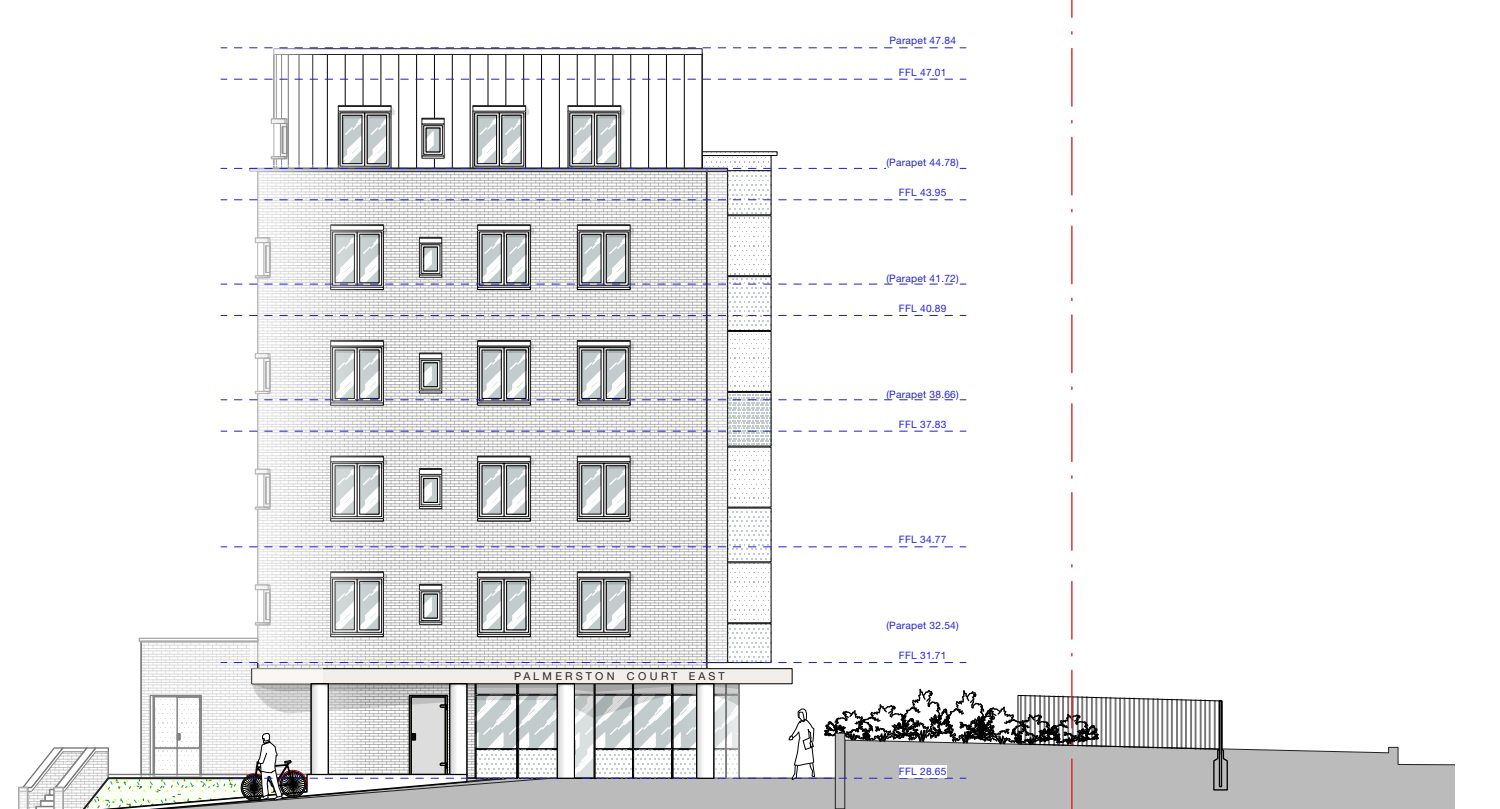
NORTH ELEVATION



WEST ELEVATION TO THE NEW RIVER



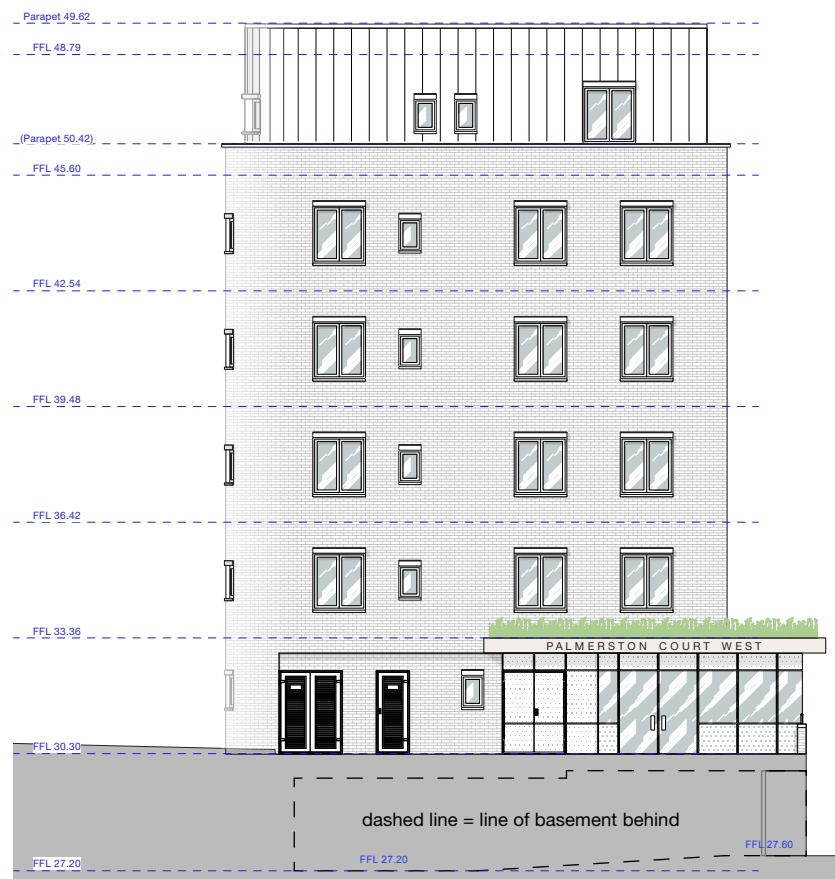
EAST ELEVATION TO PALMERSTON CRESCENT



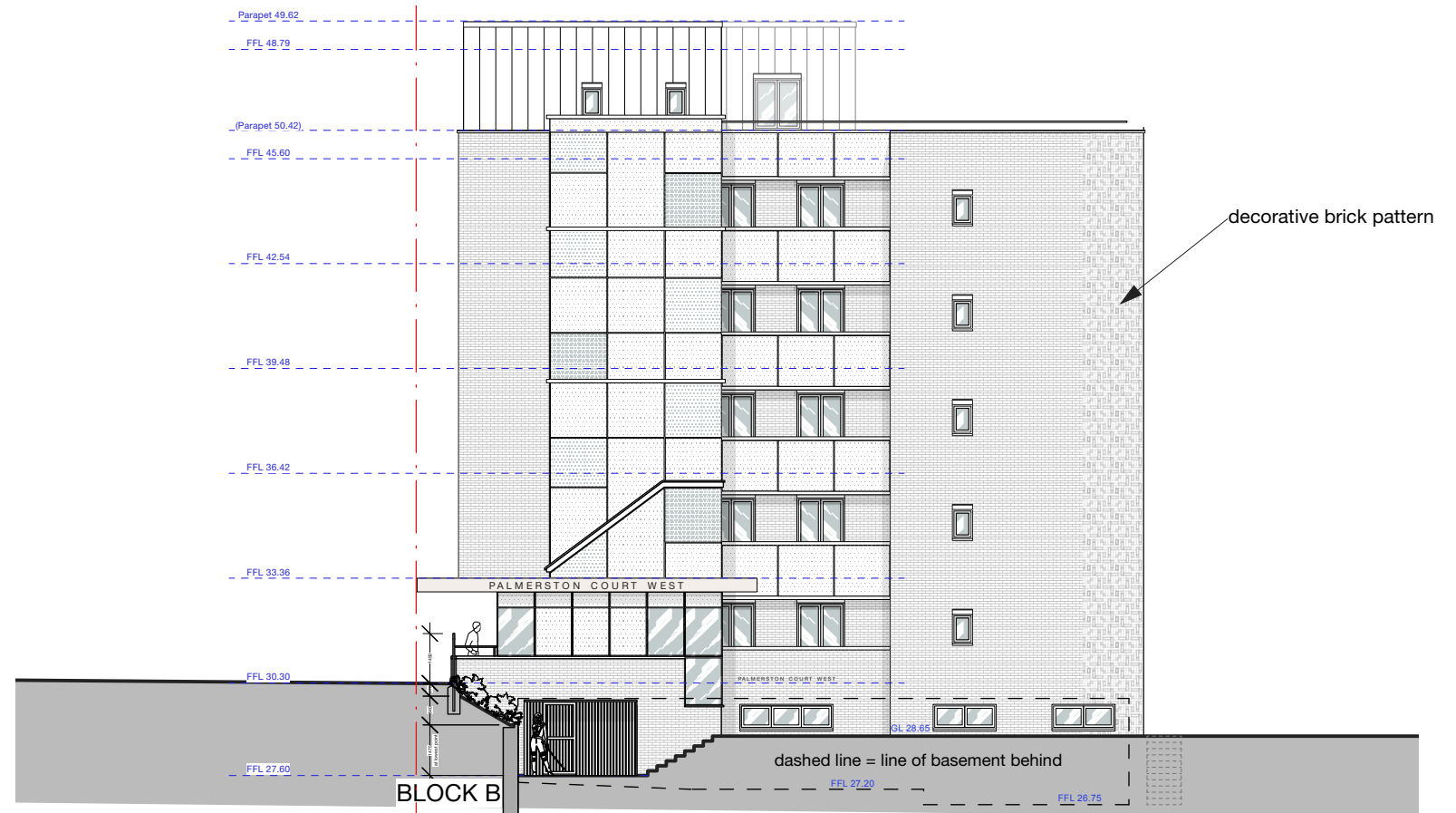
SOUTH ELEVATION TO NORTH CIRCULAR



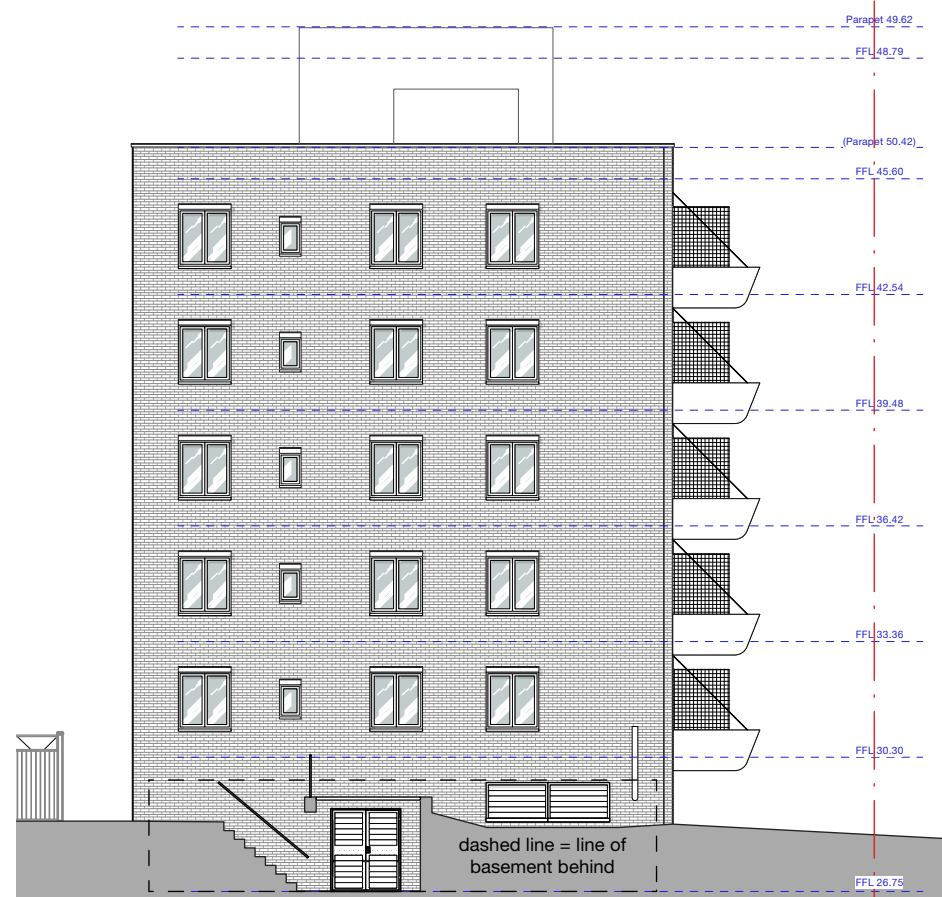
BLOCK A ELEVATIONS SCALE 1:100



SOUTH ELEVATION TO THE NORTH CIRCULAR



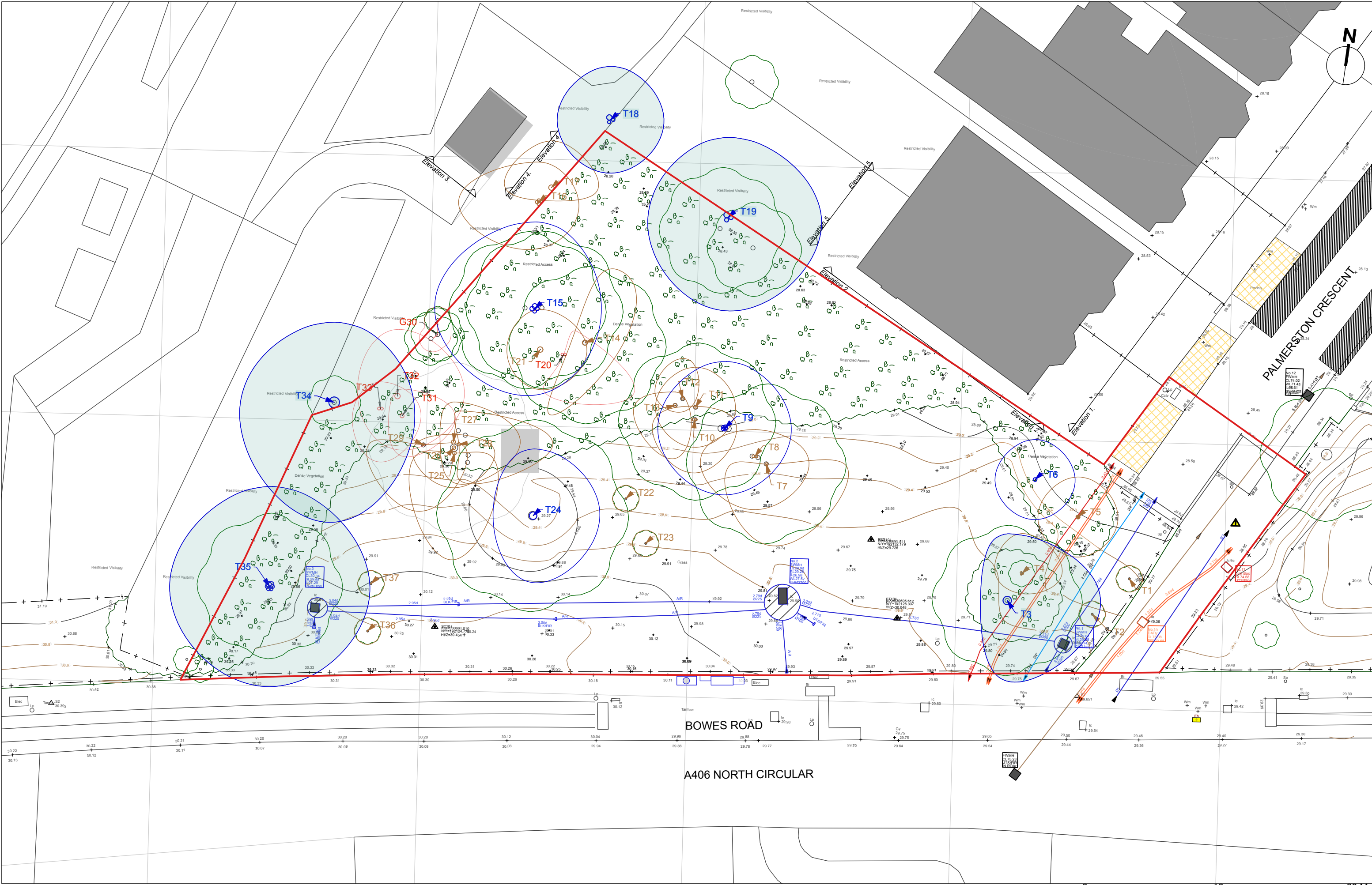
EAST ELEVATION TO PALMERSTON CRESCENT

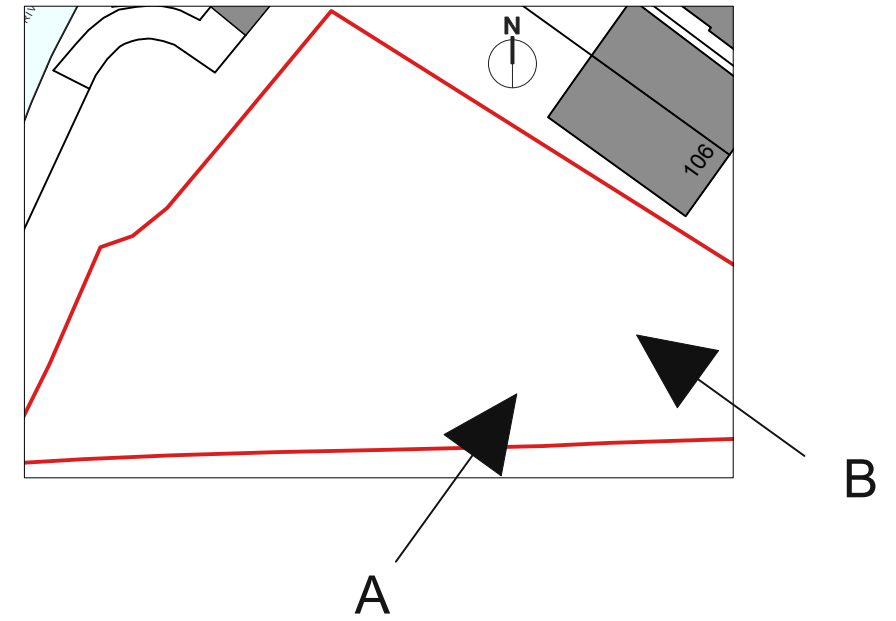


NORTH ELEVATION TO THE GARDEN



WEST ELEVATION TO THE NEW RIVER

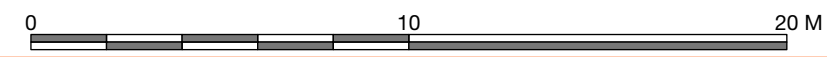


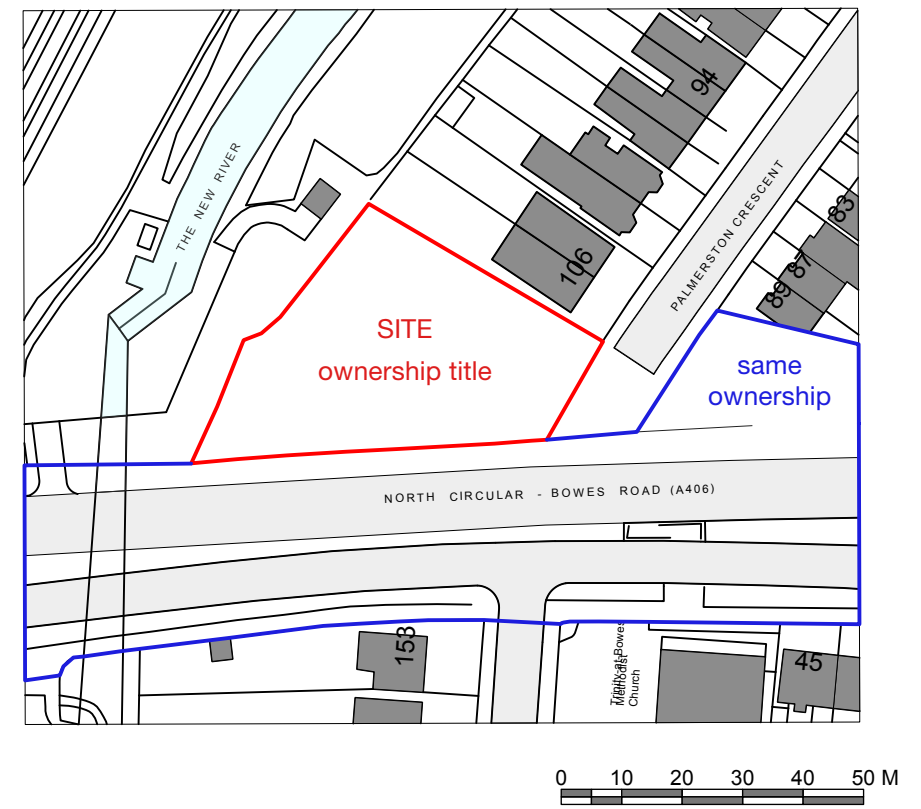
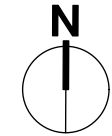
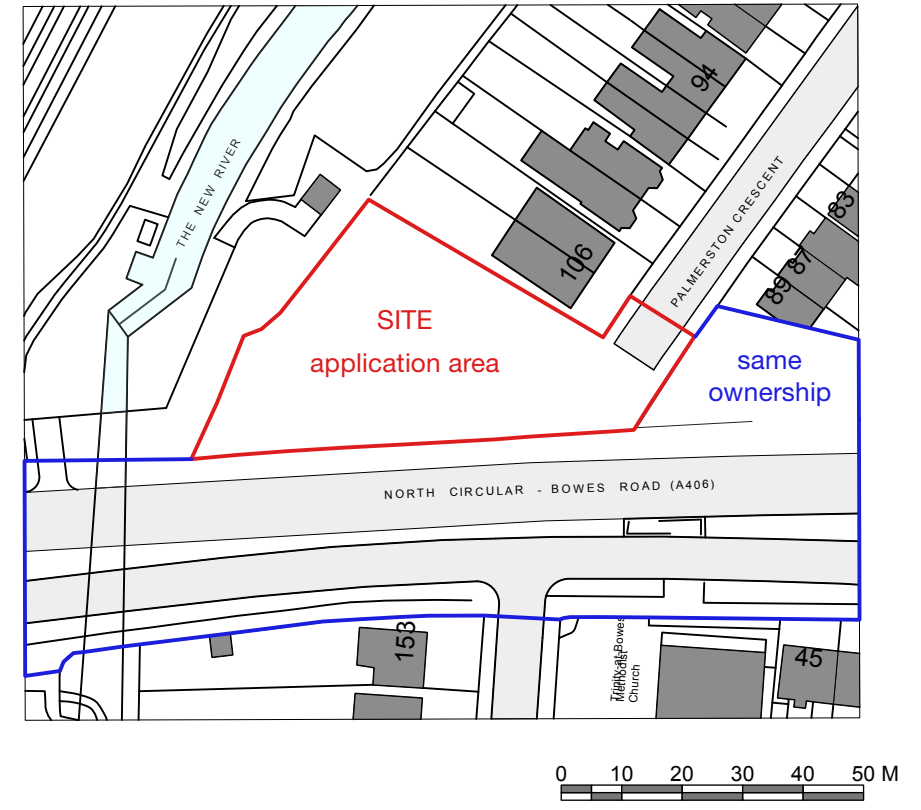


B SOUTH ELEVATIONS FROM NORTH CIRCULAR ROAD



A EAST ELEVATIONS FROM PALMERSTON CRESCENT







NORTH CIRCULAR - BOWES ROAD (A406)



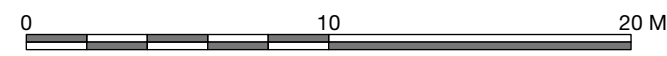


NORTH CIRCULAR - BOWES ROAD (A406)





NORTH CIRCULAR - BOWES ROAD (A406)



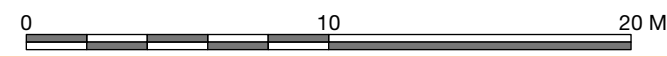
THE NEW RIVER

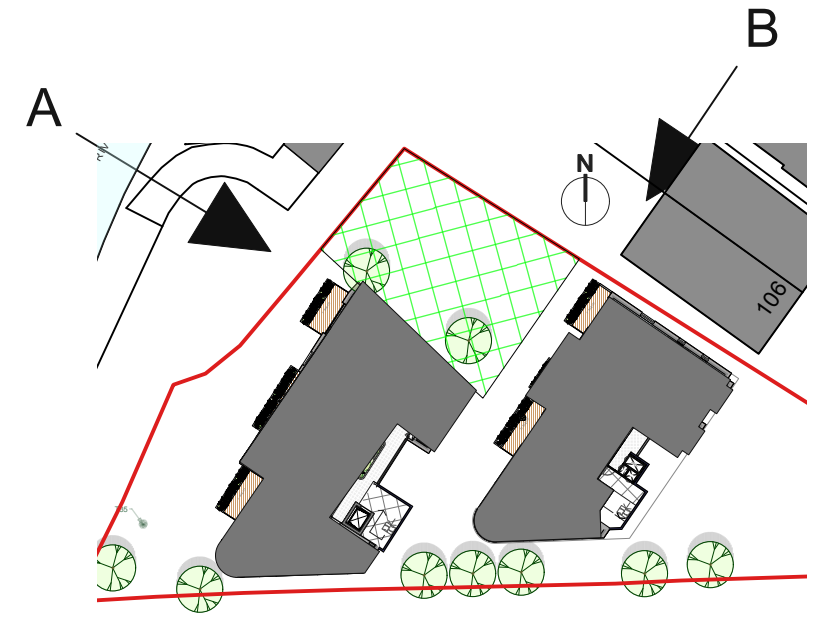
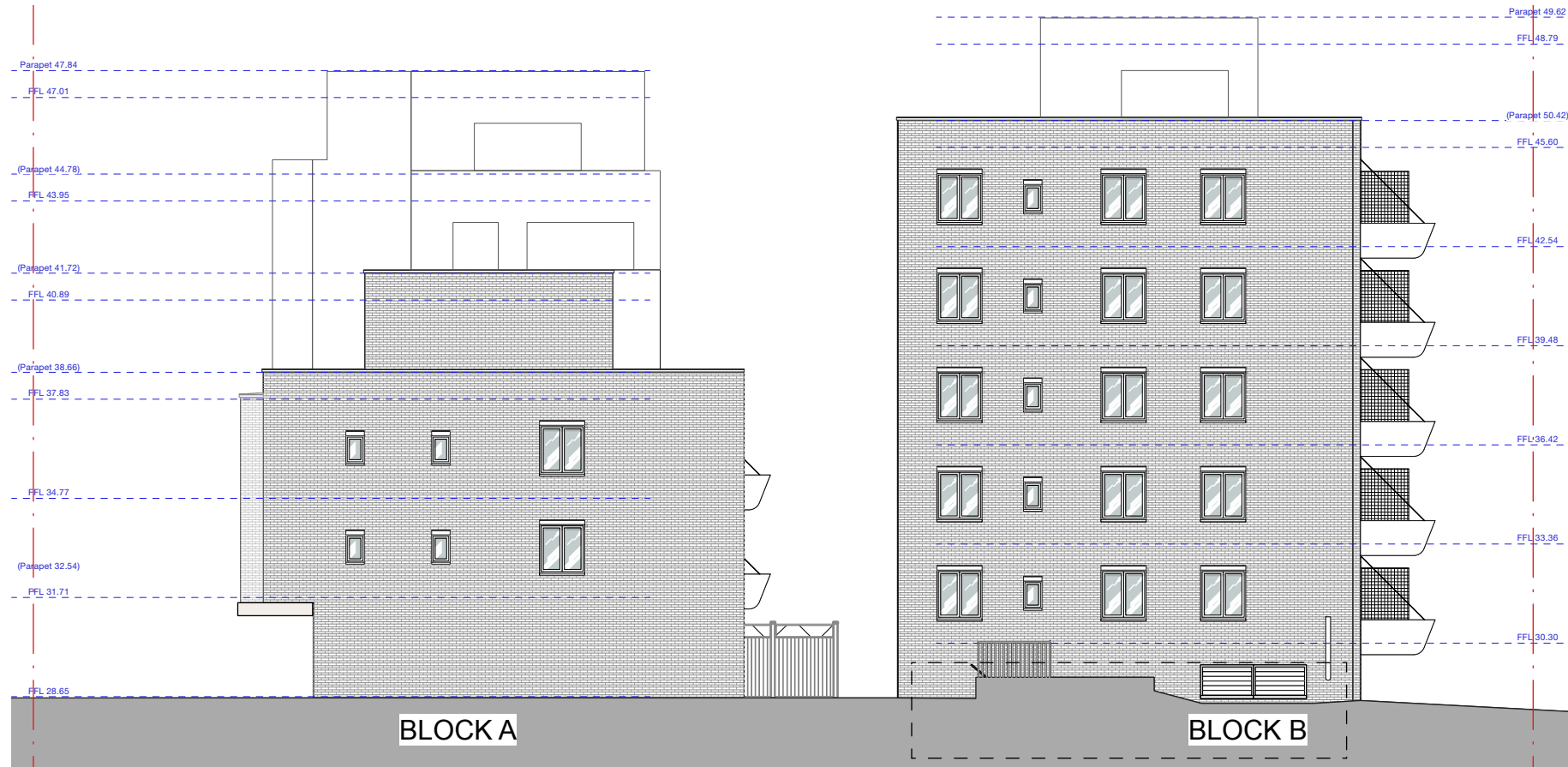


PALMERSTON CRESCENT

NORTH CIRCULAR - BOWES ROAD (A406)

FIRE HYDRANT

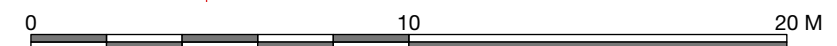




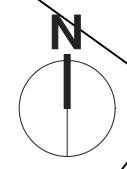
B NORTH ELEVATIONS FACING NEIGHBOURING HOUSES

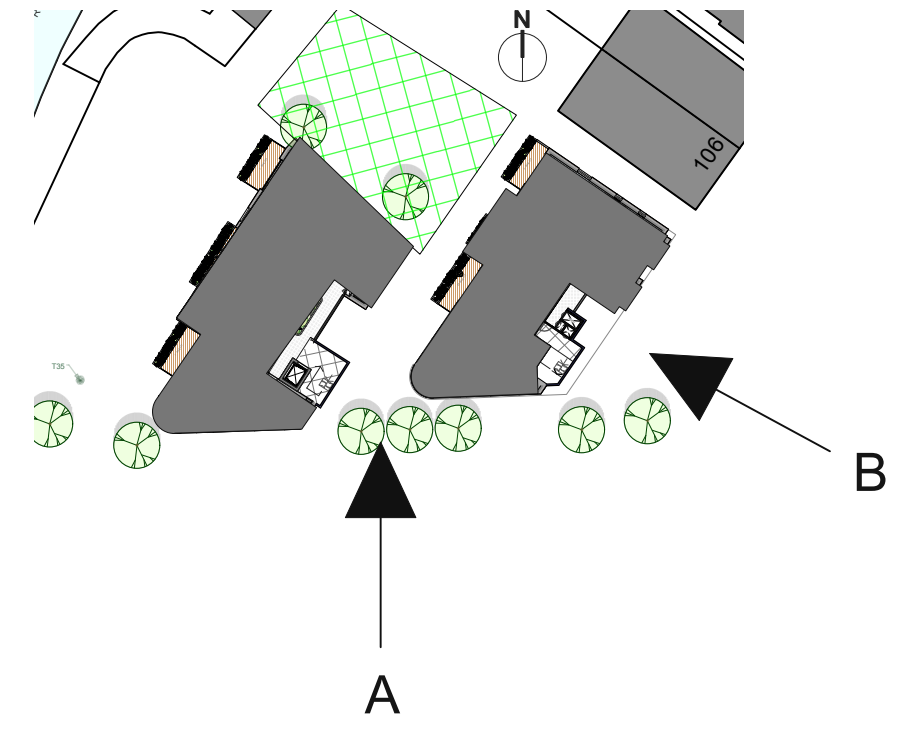
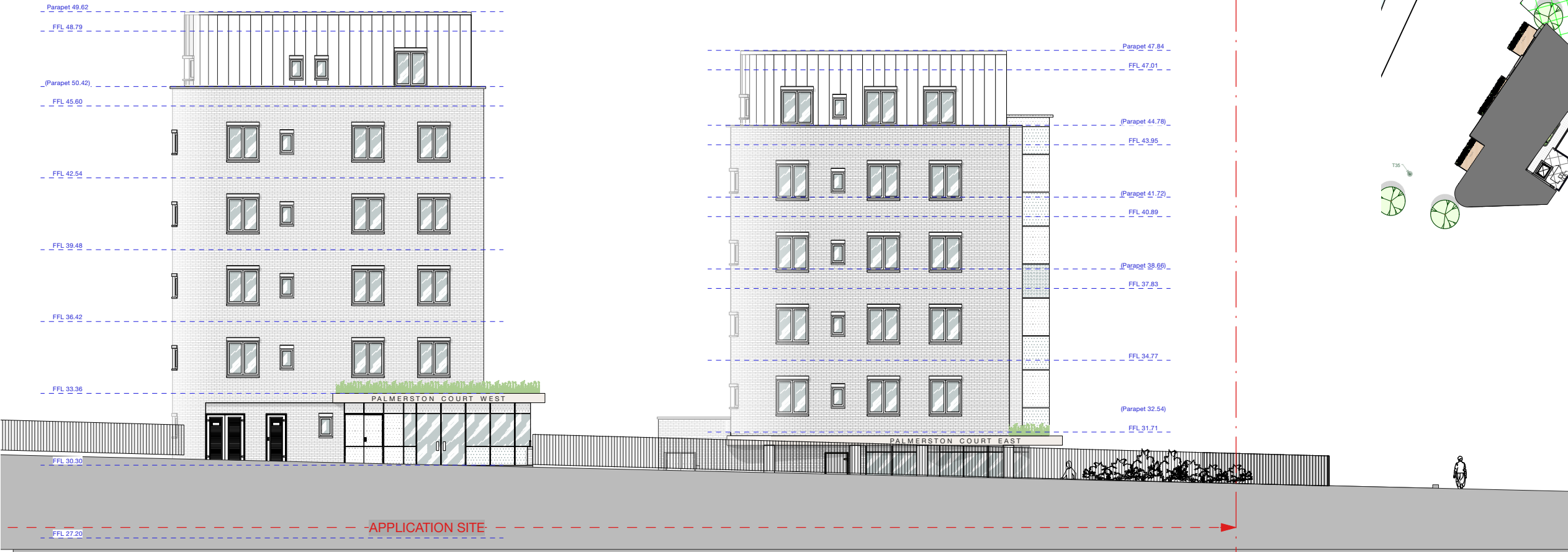


A WEST ELEVATIONS FACING THE NEW RIVER





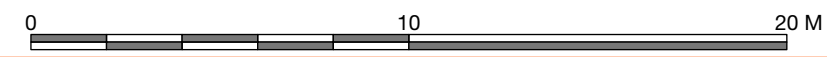




B SOUTH ELEVATIONS FROM NORTH CIRCULAR ROAD



A EAST ELEVATIONS FROM PALMERSTON CRESCENT





NORTH CIRCULAR - BOWES ROAD (A406)



