

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 23 April 2024

Report of

Head of Planning & Building
Control – Karen Page

Contact Officers:

Case Officer: Aaron Hawkins
Area Manager: Sharon Davidson

Category

Major

Ward

Ridgeway

Councillor Request

No

LOCATION: 90 Hectares of Land Lying Between Botany Bay (south) and the M25 (north).

APPLICATION NUMBER: 23/03142/RE4

PROPOSAL: Enhancement measures designed principally to provide hydrology and biodiversity betterment, including topographical amelioration, surface water management proposals and habitat creation.

Applicant Name & Address:

Mr Peter Robinson
Enfield Council
Enfield Civic Centre
Silver Street
Enfield
EN1 3XA

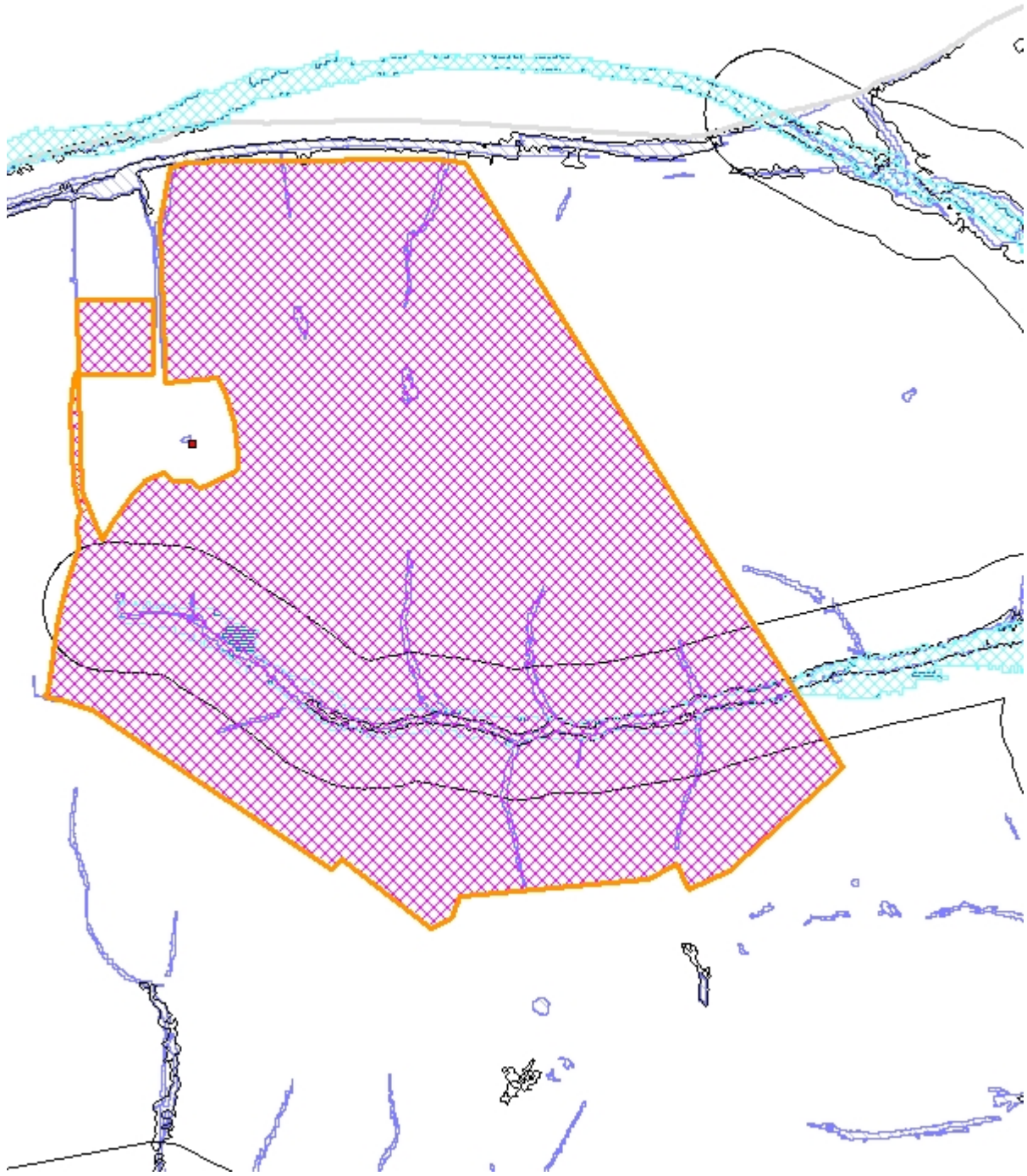
Agent Name & Address:

Mr Michael Graham
Icon Planning and Environmental Ltd.
Hethel Engineering Centre
Chapman Way
Hethel, Norwich
NR14 8FB

RECOMMENDATION:

1) That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, the Head of Planning and Building Control be authorised to **GRANT** planning permission subject to conditions.

2) That the Head of Planning and Building Control be granted delegated authority to agree the final wording of the conditions to cover the matters set out in the Recommendation section of this report.



1. Note for Members

- 1.1 The application has been brought to Planning Committee because the application is categorised as a major scheme and the fact that the Council is landowner.

2. Recommendation

- 2.1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, the Head Planning and Building Control be authorised to **GRANT** planning permission subject to conditions:

1. Approved Plans and documents
2. Construction Logistics Management Plan (CLMP)
3. Vehicles in excess of 7.5 tonnes delivery times
06:00 to 07:30 Monday to Friday, 09:00 to 18:30 Monday to Friday,
06:30 to 13:30 Saturday (excluding school holidays)
4. Details of Flood Risk Assessment and Preliminary Drainage Strategy (CWC269-RP-01-FRA-SWMP-Rev 2)
5. Verification report to be submitted in accordance with approved drainage / SuDS measures
6. 25m Holly Hill Brook exclusion zone (Earth Works)
7. Compliance with transport statement (including access arrangements)
8. Temporary access road and access from the Ridgeway to be removed once the construction works on site ceases.
9. Temporary diversion of public footpath to be maintained during construction and removed once the construction works ceases.
10. Temporary staff parking area to be maintained during construction and removed once the construction work ceases.
11. Desk Based Assessment (DBA)
12. Scheme of Investigation (WSI)
13. Materials Management Plan (MMP) and verification that imported material suitable for continued use as agricultural land
14. Drainage Surveys (National Highways)
15. Drainage Investigation - remedial works (National Highways)
16. Surface Water (National Highways)
17. Agricultural Use Only
18. Arboricultural Method Statement

19. Tree Protection Plan
 20. Arboricultural Supervision
 21. Hedgerow Survey and Planting Scheme (Phasing and timescale for delivery)
- 1.2 That the Head of Planning and Building Control be granted delegated authority to agree the final wording of the conditions to cover the matters set out above.

2. Executive Summary

2.1 This report seeks approval for the implementation of a series of measures designed principally to enhance hydrology and habitat relating to the area around Holly Hill Brook in the northwestern aspect of Enfield Chase.

2.2 The reasons for recommending approval are:

- i) The proposal will increase the productivity of agricultural land and overcome long standing drainage and soil quality issues on the site consistent with Policy DMD85 of the Development Management Document.
- ii) The scheme would be an appropriate form of development within the Green Belt that would not impact on the sites open and rural character having regard to Policy G2 of the London Plan, Policy CP33 of the Core Strategy and Policy DMD82 of the Development Management Document as well as the NPPF.
- iii) The soft landscaping and biodiversity will be enhanced across the site having regard to Policies G6 and G7 of the London Plan, Policy 36 of the Core Strategy and Policies DMD78 and DMD79. of the Development Management Document.
- iv) The development would not impact on neighbouring residential amenity, the highway network or the safety of highway users having regard to Policy D1 of the London Plan, Policy CP30 of the Core Strategy and Policy DMD 48 of the Development Management Document.
- v) The development will ensure retention of existing trees across the site in accordance with Policy DMD 80 of the Development Management Document.

3. Site and Surroundings

- 3.1 The application site comprises part of an agricultural holding located at EN2 8AN and occupies approximately 90 hectares between The Ridgeway and Botany Bay to the south, and the M25 motorway to the north. The site is bounded to the south by The Ridgeway, East Lodge Lane and a small section of the Botany Bay Cricket Club. To the east, the site is contiguous with areas of the farm not included in this proposal. Holly Hill Farm abuts the development site to the west and includes a Grade 2 listed farmhouse that is currently not in use and is largely derelict.
- 3.2 The site includes Holly Hill Brook that runs through the middle of the site and is a key geographical feature of the area. The land itself is primarily agricultural land and pasture.
- 3.3 The development site also contains a public footpath which broadly dissects the site from north to south on the western boundary of the proposed development, and an existing right of way navigates its way from the southeast of the site to the northwest where it meets the public footpath.
- 3.4 Several isolated and low-density residential dwellings are located on The Ridgeway to the south of the development site, and a number of isolated residential and small-scale industrial premises are located on East Lodge Lane.
- 3.5 The site lies within the Metropolitan Green Belt and is also designated as an Area of Special Character and a site of archaeological interest.
- 3.6 The site is not located within a Conservation Area and nor does it contain any listed buildings. The majority of the site is located within Flood Zone 1 and has a low risk of flooding, whilst the area adjacent to Holly Hill Brook is designated as Flood Zone 3. It is noted that no engineering operations will be conducted in this area.

4. Proposal

- 4.1 The proposal seeks planning permission for enhancement measures designed principally to provide hydrology and biodiversity betterment, including topographical amelioration, surface water management proposals and habitat creation. The site is to remain in its existing agricultural use.
- 4.2 The application site is approximately 90 hectares in area and the development will result in the significant re-profiling of the sites topography in order to facilitate the proposed scheme. As outlined in the supporting information provided by the applicant, 1,600,000m³ of material will be required to achieve the proposed topography. This equates to approximately 17,1750m³ per hectare. Whilst the precise nature of the materials to be imported will depend on contracts entered into and need at the time, it has been agreed, that all materials imported will comply with the CL:AIRE Code of Practice. This sets out good practice for the development industry to use when assessing on a site-specific basis whether excavated materials are classified as waste or not.

- 4.3 The proposed project has a projected timeframe of 7 years and will be implemented across various phases relating to the field structure of the existing site, with each field managed individually.
- 4.4 The proposed development comprises the following elements:
- Importation and management of suitable soils to facilitate hydrological enhancement.
 - Installation of surface water conveyance swales, catchments, attenuation ponds, and outflows.
 - Amelioration of hydrological site topography to match proposed landform.
 - Implementation of revised seeding of grass meadows to increase the quality and diversity of species.
 - Implementation of proposed planting schedule for historic hedgerow matrix.
 - Implementation of ecological enhancement measures as set out in the ecology assessment.
 - Creation of broader field margins as per landscape plans and ecological flora details.
 - Implementation of hydrology and habitat enhancement to create the proposed 'brook corridor'.
 - Retention of site within existing use class
 - Retention of all existing trees.
- 4.5 It is noted that this application does not propose the importation of waste material to the site and it does not propose that any waste management operation is undertaken within the development site. Material to be imported will be in accordance with the CL:AIRE Code of Practice.

5. Relevant Planning History

- 5.1 There is an extensive planning history on the development site and immediate surrounding area that directly relates to this scheme, but the most relevant applications are as follows:
- 5.2 19/02850/FUL - Land reprofiling for agricultural land restoration and improved visual and acoustic screening to the M25 and construction of an irrigation lagoon. Granted with conditions on 29.11.2019. Works commenced on site.
- 5.3 17/00477/FUL - Construction of soil bund screen to motorway boundary together with creation of irrigation storage lagoon and attenuation basin. – Granted subject to conditions on 04.12.2017. Works commenced on site.
- 5.4 17/00769/SO - Environmental Impact Assessment Screening Opinion Request under part 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011, as amended 2015 in relation to Construction of soil bund screen to motorway boundary together with creation of irrigation storage lagoon. Screening Opinion – EIA not required - Decision issued 7.03.2017
- 5.5 17/004/477/FUL – Construction of soil bund screen to motorway boundary together with creation of irrigation storage lagoon and attenuation basin. Granted subject to conditions on 21.03.2017

- 5.6 16/03444/FUL - Change of use of part of farmyard for creation of mulch from green waste together with storage and processing of timber and use of units 5 and 6 in association with wood processing. - Granted subject to conditions on 28.03.2017.

6. Consultation

Public Response:

- 6.1 Consultation letters have been sent out to neighbouring properties Letters were sent out on the 12/10/2023 and 101 neighbouring properties were notified with the consultation period ended on 05/11/2023.

9 objections have been received and the concerns have been summarised below:

- Close to adjoining properties
- Out of keeping with character of area
- Mud deposited on The Ridgeway
- Noise nuisance
- Potentially contaminated land
- Increase of pollution
- Inadequate access
- Inadequate parking provision
- Increase danger of flooding
- Potentially contaminated land
- Strain on existing community facilities
- General dislike of proposal
- Adverse impact on local ecology
- Adverse impact on local habitat
- Inconsistencies with the submitted materials associated with the scheme (quantum of import material not correctly specified in transport statement)

Officer comment: These concerns are currently under review any inconsistencies detected will updated prior to the meeting.

External Consultees:

- 6.2 *Environment Agency (EA)*: At time of writing , the Environment Agency objects to the proposed scheme due to concerns regarding the proposed

materials to be deposited on site. To resolve this matter a draft Material Management Plan condition has been proposed to ensure that all materials imported / deposited on site must comply with the CL:AIRE Code of Practice. Officers are currently awaiting confirmation on the suitability of this condition. An update will be provided at the meeting.

- 6.3 *Highways England*: No objection subject to conditions relating to building in accordance with the approved plans and the submitted M25 bund monitoring strategy. Conditions are included in the recommendation section above.
- 6.4 *Historic England*: Following revisions to the originally submitted Written Scheme of Investigation (WSI) to ensure it accords with relevant standards and guidance, no objection is raised subject to conditions. Conditions are included in the recommendation section above.

Internal Consultees:

- 6.5 *Traffic & Transportation*: No objection subject to conditions relating to parking, access and deliveries. This will be addressed in conditions 3 and 6 of the list of conditions set out above. Additionally conditions 2, 8, 9 and 10 will also ensure management of the sites access and parking proposals.
- 6.6 *Tree Officer*: No objection subject to further information being provided in relation to how the development will change hydrology within the site and how this will impact water distribution to established trees. This can be addressed through an update to the Arboricultural Impact Assessment. This information has been requested and an update will be provided at the meeting
- 6.7 *SuDS Officer*: No objection subject to conditions, please see sections 8.31 to 8.33 for further reference.
- 6.8 *Environmental Health Officer*: No objection subject to a verification report condition to demonstrate that the soil imported is suitable for use on agricultural land. A condition is included in the recommendation section above.

7. Relevant Policies

7.1 London Plan (2021)

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:

Policy SI 2 Minimising greenhouse gas emissions
Policy SI 5 Water infrastructure
Policy SI 7 Reducing waste and supporting the circular economy
Policy SI 13 Sustainable drainage
Policy D1 London's form, character and capacity for growth
Policy D14 Noise
Policy HC1 Heritage conservation and growth
Policy G2 London's Green Belt
Policy G4 Open Space
Policy G6 Biodiversity and access to nature
Policy G7 Trees and woodland

7.2 Local Plan - Overview

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

7.3 Core Strategy (2010)

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.

CP24: The road network

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

CP31: Built and landscape heritage

CP32: Pollution

CP33: Green Belt and countryside

CP36: Biodiversity

7.4 Development Management Document (2014)

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.

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

DMD44 Preserving and Enhancing Heritage Assets

DMD47 New Roads, Access and Servicing

DMD 48 Transport Implications of New Development

DMD59 Avoiding and Reducing Flood Risk

DMD60 Assessing Flood Risk

DMD61 Managing Surface Water

DMD68 Noise

DMD78 Nature conservation

DMD79 Ecological enhancements

DMD81 Landscaping

DMD82 Protecting the Green Belt

DMD84 Areas of Special Character

DMD85 Land for Food and Other Agricultural Uses

7.5 Other Material Considerations

8. Assessment

8.1 The main issues arising from this proposal for Members to consider are:

1. Principle of Development - Green Belt
2. Impact on character
3. Impact on Adjoining Occupiers
4. Contamination
5. Highway Issues
6. Impact on M25
7. Drainage
8. Trees, Landscape and Biodiversity
9. Environmental Issues

Principle of Development

8.2 The proposal seeks to provide a series of hydrology and habitat enhancements relating to the area around Holly Hill Brook in the northwestern aspect of Enfield Chase. This will improve drainage across the site, and create a natural barrier to the M25, thus reducing noise, and creating a visual improvement through the introduction of landscaping on the site. A key component of the proposed enhancements is the creation of a series of linked attenuation ponds and swales within Holly Hill Brook. This will increase the efficiency with which surface water can be captured and controlled, but it also provides significant habitat benefits. The introduction of reeds and other suitable planting within the attenuation ponds and swales will not only increase habitat value but will also serve to improve the quality of water outflowing from these attenuation features, as well as reducing the volume of sediment deposited into the brook.

8.3 The primary in principle consideration for this proposal is the suitability of the scheme having regard to its siting within the Green Belt.

Green Belt

8.4 The site is located within the Metropolitan Green Belt. The National Planning Policy Framework (NPPF) (paragraph 142) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The NPPF confirms that inappropriate development is harmful to the Green Belt and should only be approved in very special circumstances and substantial weight must be given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of its inappropriateness, and any other harm, is clearly outweighed by other considerations.

8.5 It also confirms that certain forms of development, such as engineering operations, are not inappropriate in the Green Belt providing that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The NPPF also confirms that in order to promote a strong rural economy, local plans should, amongst other considerations,

“promote the development and diversification of agriculture and other land-based rural businesses”.

- 8.6 The proposed works would constitute engineering operations. With regard to the impact on openness, due to the nature and scale of the proposal it is considered that the final scheme would keep the land open but at a higher level across the site. It is recognised that during the proposed 7-year development period that the scheme will have an impact on the openness of the Green Belt due to the construction process. However, as the scheme will be implemented in staggered phases and given the overall temporary nature of the development works this is not considered unacceptable. The development will not prejudice the continued use of the land for an appropriate Green Belt use once the works are completed. It is also noted in the applicants submitted planning statement that site will still function as usable agricultural land throughout the 7-year development process. In this regard therefore, the development is considered to constitute appropriate development in the Green Belt and would be acceptable in terms of its effect on the green belt.

Impact on Character

- 8.7 Policy CP30 of the Core Strategy requires new development to be of a high-quality design and in keeping with the character of the surrounding area. Policy DMD37 sets out criteria for achieving high quality and design led development.
- 8.8 Although areas of the site would increase in height by up to 3 metres, the ground levels will not exceed the existing highest point on the site. It is considered that the open and rural character of the area would remain.
- 8.9 The proposed development is to the north, east and south of Holly Hill Farmhouse, a Grade II Listed Building. However, it is noted that the proposed scheme makes no changes to the existing topography at any boundary of the site, within the existing farm compound (which is outside the red line boundary for the development), or at any point on the farm track, either leading up to the farmhouse, or running east to west along the site’s central ridge. There are therefore no works in proximity to the farmhouse. The ecological enhancement areas in proximity to the farmhouse are limited to 15m wide field margins, which are to be planted with a wildflower mix. So, whilst there will be additional wildflower added into areas close to the farmhouse, nothing more substantive is proposed. As such it is deemed that the proposed scheme will pose no adverse impact or harm to the adjoining listed building. With the proposed enhancements of the scheme once complete will create a positive gain to the area and its open landscape.
- 8.10 The site falls within the farmland ridge and valleys landscape character – Turkey Brook Valley which has characteristics such as mature, well managed hedgerows with intermittent mature hedgerow trees and undulating landscapes. Visual impact assessments from a range of locations across the site have been provided to help understand the impact of the proposal. With the proposed land levels and the soft landscaping proposed across the site, in line with Policy DMD37, it is not considered that the proposed development would be inappropriate to its context or fail to have appropriate regard to its surroundings or the character of the surrounding area.

Impact on Adjoining Occupiers

- 8.11 Given the open nature of the broader surrounding area, adjoining occupiers are sufficiently setback from all proposed works. Residential buildings that front the Ridgeway are generally setback 50-100m from proposed works. The subject site also features a significant number of existing trees and mature vegetation that will be retained as part of this proposal and will aid in providing screening and mitigating any visual impact to surrounding occupiers as well as to the Ridgeway and M25.
- 8.12 Concerns have been raised by local residents during the consultation period regarding traffic impacts, noise nuisances and road pollution during the construction process. The application was referred to both the council transportation team and National Highways who found the proposed traffic generated during the 7-year construction process as well as the proposed pollution mitigation techniques (wheel washing and associated facilities) to be used on site to reduce mud deposits on the local road network to be satisfactory and to pose no adverse impact. A Construction Logistics Management Plan (CLMP) has been included as a condition of approval to secure the proposed construction works are undertaken in a satisfactory manner as to not pose harm to adjoining occupiers. The council Environmental Health Team was also consulted and raised no objections to the scheme in relation to pollution or noise disruptions. As such the impact on adjoining occupiers is deemed to be acceptable.

Contamination

- 8.13 The material to be brought in and used to implement the scheme must be suitable for use on agricultural land and pose no adverse impact to the existing environmental integrity of the subject site. This requirement is in line with previous agricultural enhancement undertaken by the council at 19/02850/FUL. As such, the proposal would comply with Core Strategy Policy CP32 and DMD Policies 64 and 65, which aim to ensure that potential polluting emissions from development proposals are suitably controlled.
- 8.14 As outlined in the planning statement / supporting documents submitted by the applicant as part of the proposed scheme, the development will import 1,600,000m³ of external material to facilitate the proposed topographical and ecological enhancements. These materials will be clean, naturally occurring, inert materials under the governance conforming with CL:AIRE Code of Practice. It is noted that the Environment Agency are presently raising an objection to the application due to concerns regarding materials to be deposited on site. In order to address these concerns it is recommended that a condition be imposed requiring the submission of a Materials Management Plan. The Environment Agency have been advised of the suggested condition and an update will be provided at the meeting.
- 8.15 Environmental Health do not object to the application as there is unlikely to be any negative environmental impact. In particular, there are no concerns regarding air quality or noise.

Highway Issues

- 8.16 The main highway issues for this scheme relate to the transfer of ground material onto the Ridgeway, the safety of traffic using the Ridgeway during construction works, and the safety of pedestrians and cyclists using the public footpaths. A Transport Assessment which outlines details of how the site will be managed during the proposed construction works has been submitted with the application.
- 8.17 It is noted within the submitted Transport Assessment that the proposal will utilise the existing site access that is present on the subject site which connects the site to The Ridgeway and wider road network. This vehicle access has been previously enhanced as part of works undertaken for 19/02850/FUL, as such it has been designed to accommodate the traffic volume anticipated with the engineering works. This access is a left in, right out arrangement, with this reinforced by way of advisory signing. This existing arrangement will be retained and will not be altered as part of this development. Once construction has ceased operation on the subject site the existing vehicle access and car park present on site will be removed with the existing agricultural land reinstated in its place. Adherence to these works will be secured via conditions of approval (Conditions 8-10).
- 8.18 There is a car park to the rear of the site to accommodate staff and visitors, and there is a wheel washing system in place that vehicles go through upon exiting the site. Deliveries from the site will take place from The Ridgeway. The site will be open from 6:00 to 18:30 Monday to Friday and 8:00 to 14:00 on Saturdays. Weekday deliveries to the site will not be permitted between 7:30 to 9:00 to ensure there is no significant impact on the highway network and highway users. This restriction will be removed during school holiday periods and will be secured via a condition of approval. It is noted that the operating hours proposed are in line with the previously approved scheme at 19/02850/FUL and the adjoining site.
- 8.19 Transportation Officers have confirmed that they do not have any concerns with the scheme subject to conditions. Subsequently, the proposal will not unacceptably impact on highway safety or the operation of the local road network.

Impact on the M25

- 8.20 Highways England is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.
- 8.21 Highways England (HE) have been consulted on the scheme due to the potential impact that the development might have on the M25. HE raises no objection to the scheme subject to conditions, on the basis that the proposal will not materially affect the safety, reliability and/or operation of the Strategic Road Network. The conditions requested are included in the recommendation section above.

Impact on Trees and Landscape

- 8.22 Policy DMD80 states that all development including subsidiary or enabling works that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value will be refused.
- 8.23 Policy DMD81 states that development must provide high quality landscaping that enhances the local environment. The National Planning Policy Framework has been updated to include policies surrounding veteran trees so that they are now recognised as hugely valuable to heritage, culture and ecosystem service provision. The relevant part of the NPPF is paragraph 186, these trees are considered sacrosanct and all development should be refused except for nationally important projects. Veteran trees are trees that are of exceptional interest biologically, aesthetically or culturally because of age, size or condition. They are irreplaceable and are of exceptional ecological value.
- 8.24 The site comprises fields with native trees and hedgerows along field boundaries. Mature Oak and Ash are the dominant species. An Arboricultural Report has been submitted with the application. The report states that there are 248 individual trees across the site with additional tree groups. Of the individual trees, 99 are A grade trees, 62 are B grade trees, 82 are C grade trees and the remaining 5 are U grade trees. It is noted by the Council's Tree Officer that there are no veteran trees present on the subject site at the time of assessment.
- 8.25 The submitted report identifies that no existing trees are proposed to be removed as part of this application. It also identifies that the proposed changes to landform and new drainage features will be outside of the root protection areas of existing trees. This approach is supported.
- 8.26 However, the proposed changes to landform and the new drainage features also have the potential to adversely affect trees by changing soil moisture levels within their rooting environment. The proposed swales and basins would run parallel to the brooks. They would intercept some water from the adjacent field which would presently be accessible to the adjacent trees which are situated on levels below the drainage features. Section 5.2 of the submitted report states that: 'steps should be taken to ensure that existing soil and moisture levels are maintained'. However, details of these proposed measures have not been provided. This matter is currently being addressed by the applicant to ensure that the hydrological conditions for retained trees remain acceptable. An update will be provided at the meeting.
- 8.27 Subject to the satisfactory resolution of the above, to ensure the longevity of the existing trees across the site and to ensure that the RPAs of the existing trees are sufficiently protected a Tree Protection Plan for each phase is to be secured via a condition of approval. This condition will be accompanied by an arboricultural supervision condition to ensure adherence to the approved scheme.

Impact on Biodiversity

- 8.28 Through Policy 36 of the Core Strategy the Council commits to 'protect, enhance, restore or add to biodiversity interests within the Borough'. This is reaffirmed in Policies DMD78 to DMD81. The National Planning Policy Framework (NPPF) recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible,

contributing to the Government's commitment to halt the overall decline in biodiversity, including the establishing of coherent ecological networks that are more resilient to current and future pressures. Paragraph 180 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should therefore be encouraged.

- 8.29 Biodiversity improvements will be achieved through the planting of trees, creation of hedgerows and grassland enhancements across the site. Significant soft landscaping is proposed and it is considered that a high-quality landscaping scheme will enhance the local environment and character of the site. Further details of the proposed landscaping, including the number of trees proposed, shall be secured by condition.
- 8.30 The scheme will also see significant hydrological enhancements to Holly Hill Brook along with the creation of several attenuation ponds and swales. The scheme will plant reeds and other suitable vegetation within the attenuation ponds and swales which will aid in increasing habitat value as well as improving the quality of water outflowing from these attenuation features.

Drainage

- 8.31 The NPPF requires site specific Flood Risk Assessments (FRAs) be carried out for developments proposed in flood risk areas. The majority of the subject site is located within Flood Zone 1 and has a low risk of flooding, whilst the area adjacent to Holly Hill Brook is designated as Flood Zone 3. It is noted that no engineering operations will be conducted in this area.
- 8.32 The scheme would incorporate ponds and swales to ensure appropriate and sustainable drainage of the land, as well as providing for attenuation areas to allow for climate change increases in rainfall. The proposal would improve the drainage characteristics of the land, thereby enhancing hydrology and habitat relating to the area around Holly Hill Brook. The scheme would increase the sites resilience against the ongoing threats of climate change, sufficiently regulating surface water outflow while providing efficiency with which surface water can be captured and controlled on site.
- 8.33 The FRA suggests that the development will achieve a 10% reduction of pre-development Greenfield Runoff Rates, further details on how this will be achieved will be secured by condition (Condition 4). The storage required to achieve this will be delivered through a series of connected SuDS features along overland flow routes, which should be enough to compensate for the flood storage lost as a result of raising levels. In addition, there will be a 25m exclusion zone either side of the Holly Hill Brook where no earthworks will be taking place.
- 8.34 No objections have been raised by the LLFA subject to a series of conditions relating to the submitted Flood Risk Assessment and Preliminary Drainage Strategy (CWC269-RP-01-FRA-SWMP-Rev 2).

Archaeology

- 8.35 The subject site is located within an Archaeological Priority Area (APA) of Enfield Chase and Camlet Moat. The APA covers the landscape remains of the medieval royal hunting forest. As such, the proposed scheme was referred to Historic England who have reviewed the submission. They have raised no

objection to the scheme subject to conditions. These conditions relate to the implementation of a Desk Based Assessment (DBA) and Written Scheme of Investigation (WSI) to be conducted and approved prior to the commencement of works to ensure the historic nature of the subject site is protected.

9.0 CIL

- 9.1 The development would not be CIL liable as there is no increase in floor space.

10.0 Public Sector Equalities Duty

- 10.1 In this instance it is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

11.0 Conclusion

- 11.1 The proposed development would provide significant hydrological, habitat and biodiversity enhancements to the subject site. This would be consistent with the objectives of the NPPF (2023), London Plan (2021) Enfield Core Strategy (2010) and Enfield Development Management Document (2014). Subject to further information and details that can be secured through conditions, the proposed development is considered to be an appropriate form of development within the Green Belt and would not result in any demonstrable harm to the open and rural character of the site, the highway network or the wider area.
- 11.2 The proposal is therefore considered acceptable (subject to the aforementioned outstanding items relating to the environment agency / tree officer) for the following reasons subject to :

- i) The proposal will increase the productivity of agricultural land and overcome long standing drainage and soil quality issues on the site consistent with Policy DMD85 of the Development management Document.
- ii) The scheme would be an appropriate form of development within the Green Belt that would not impact on the sites open and rural character having regard to Policy G2 of the London Plan, Policy CP33 of the Core Strategy and Policy DMD82 of the Development Management Document as well as the NPPF.
- iii) The soft landscaping and biodiversity will be enhanced across the site having regard to Policies G6 and G7 of the London Plan, Policy 36 of the Core Strategy and Policies DMD78 and DMD79. of the Development Management Document.
- iv) The development would not impact on neighbouring residential amenity, the highway network or the safety of highway users having regard to Policy D1 of the London Plan, Policy CP30 of the Core Strategy and Policy DMD 48 of the Development Management Document.
- v) The development will ensure retention of existing trees across the site in accordance with Policy DMD 80 of the Development Management Document.



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 Hethel Engineering Centre
 Chapman Way
 Norwich
 NR148FB
 01953 857669

SITE: Enfield Chase enhancement hydrology and habitat

TITLE: General arrangement Existing

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| SCALE AT A1: | DATE: | DRAWN: | CHECKED: |
| 1:2500 | 08-23 | HB | MG |

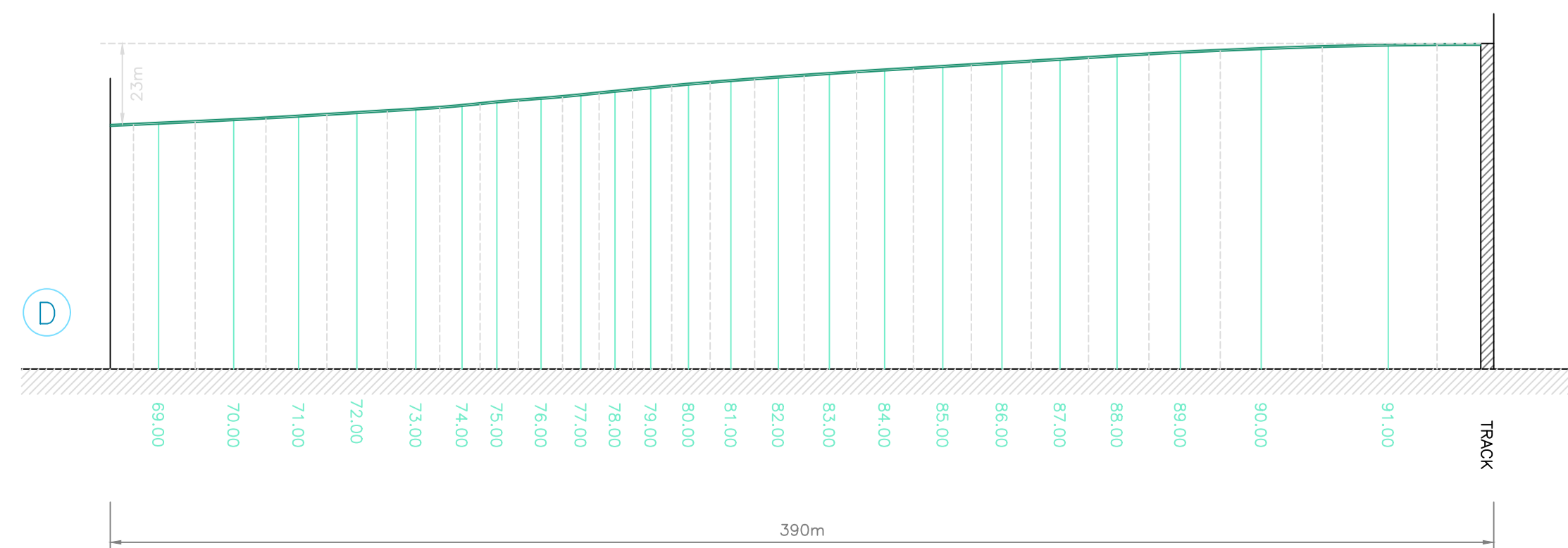
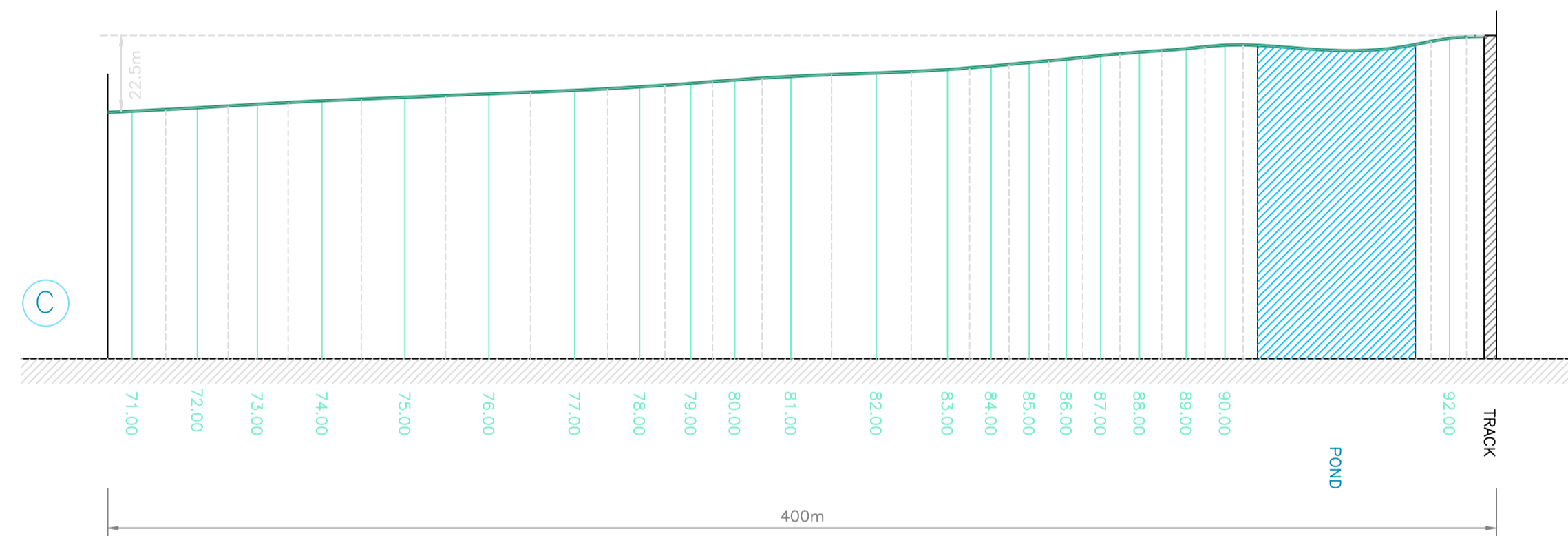
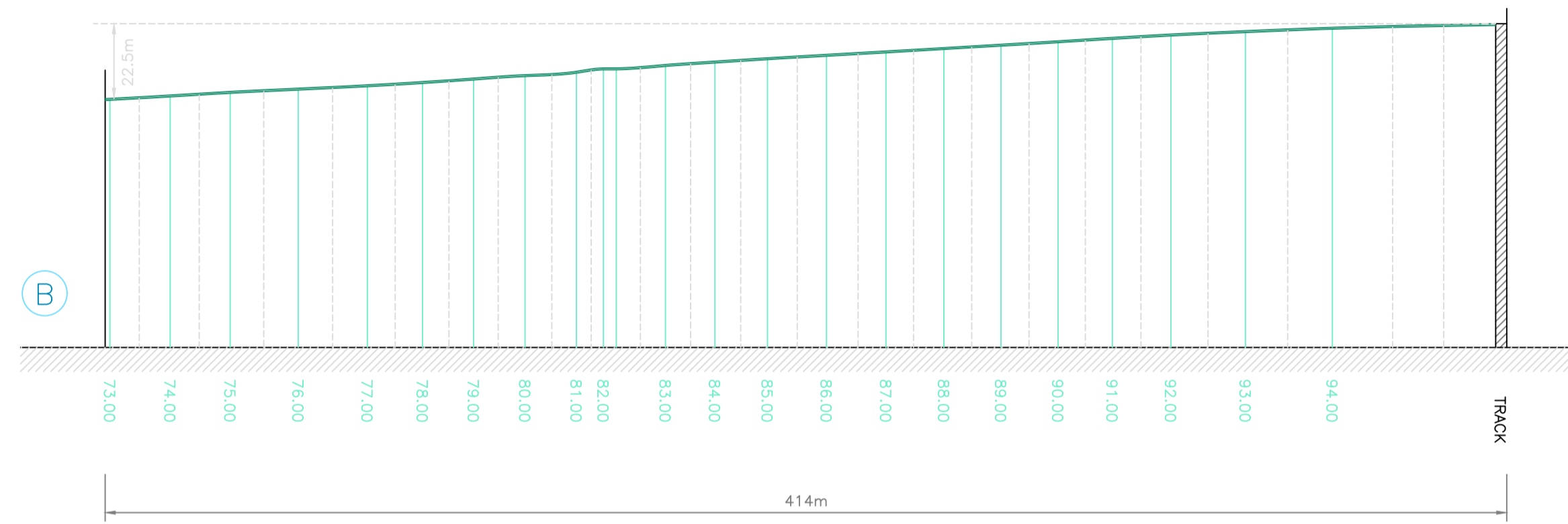
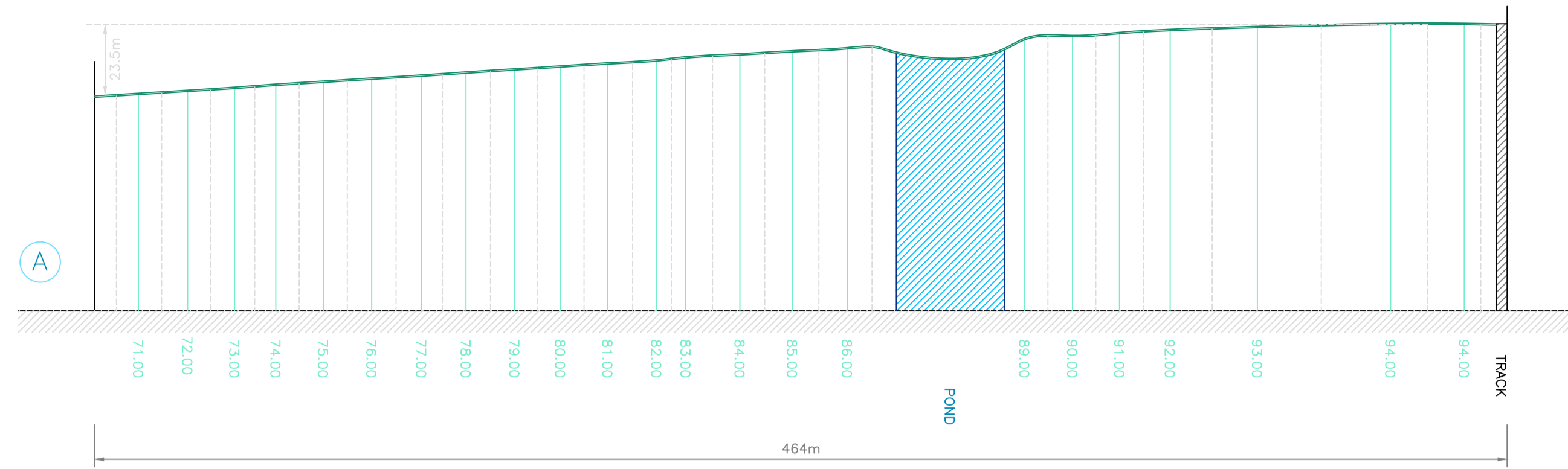
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| PROJECT NO: | DRAWING NO: | REVISION: |
| 3973 | ECHH.DG.001 | A |

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| | Icon Consulting |
| | Hethel Engineering Centre Chapman Way Norwich NR148FB 01953 857669 |

SITE: Enfield Chase enhancement hydrology and habitat

TITLE: Existing sections Sheet 1

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|------------------------|----------------|--------------|----------------|
| SCALE AT A1: 1:1500 | DATE: 08-23 | DRAWN: HB | CHECKED: MG |
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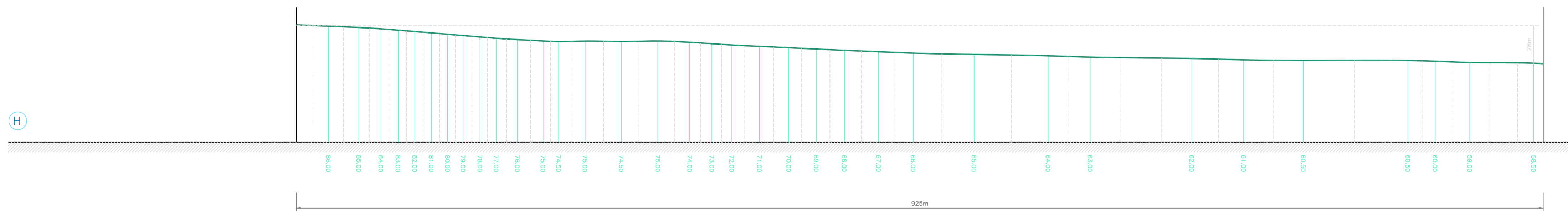
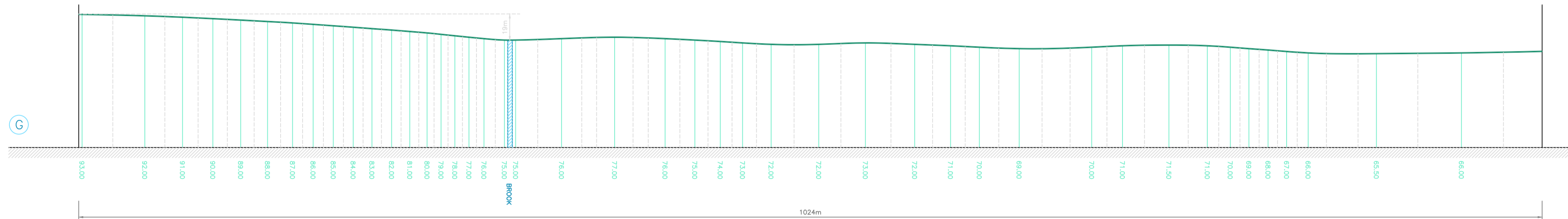
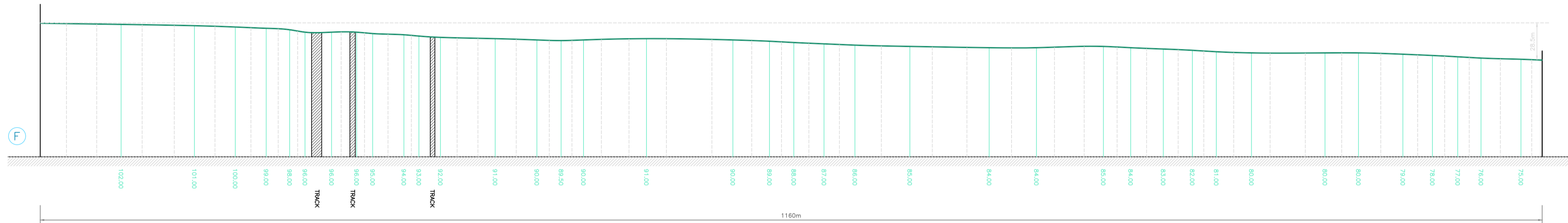
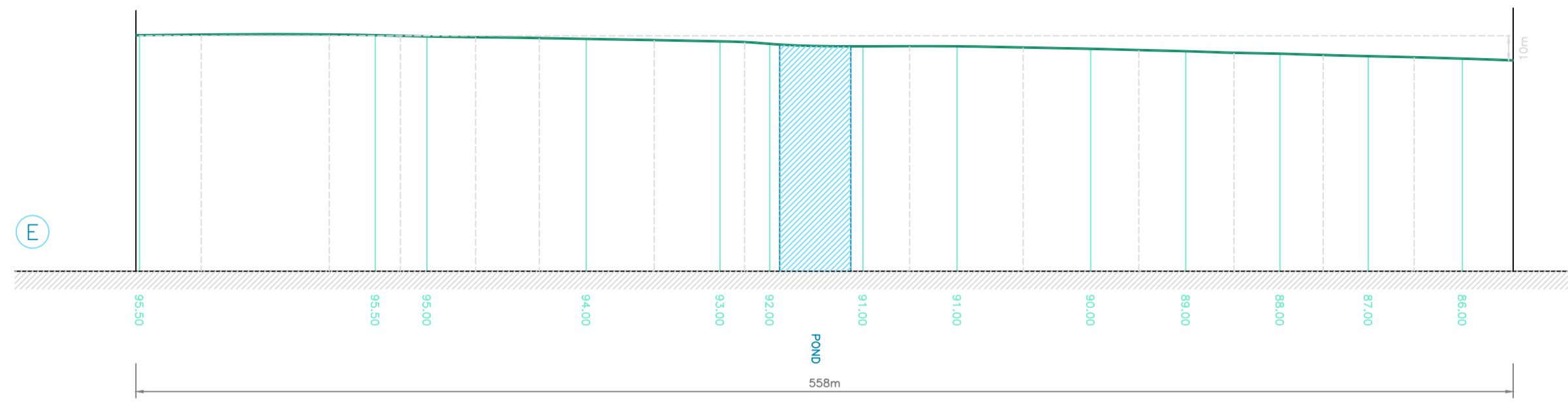
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STATUS: ISSUE

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SITE: Enfield Chase enhancement hydrology and habitat

TITLE: Existing sections Sheet 2

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| SCALE AT A1: 1:2000 | DATE: 08-23 | DRAWN: HB | CHECKED: MG |
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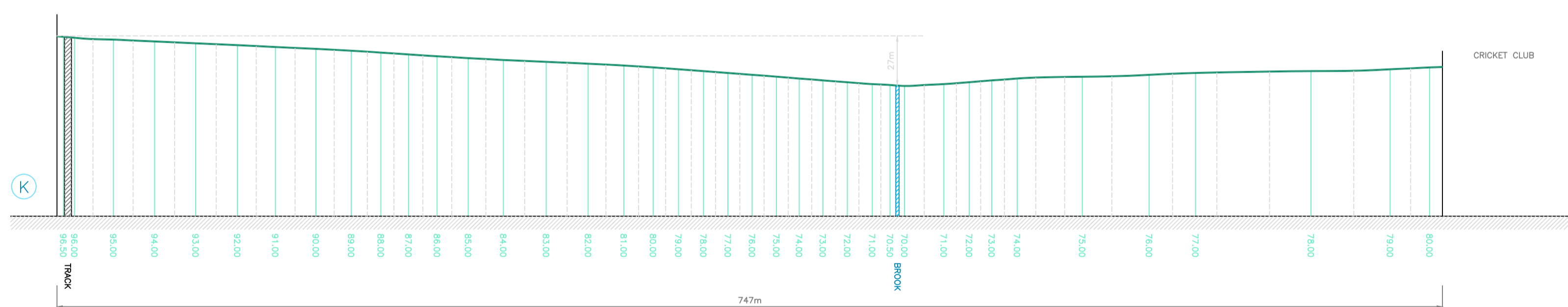
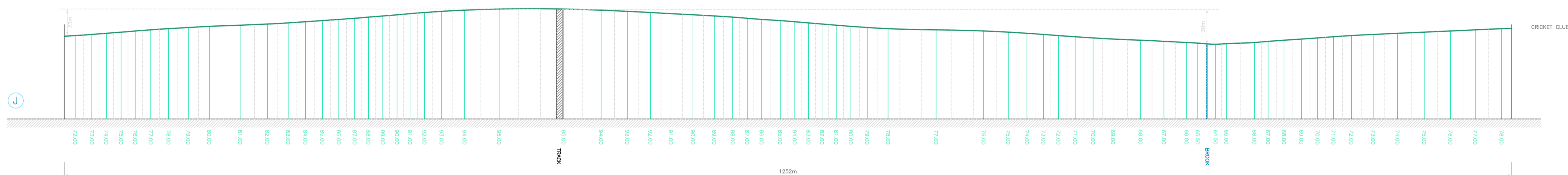
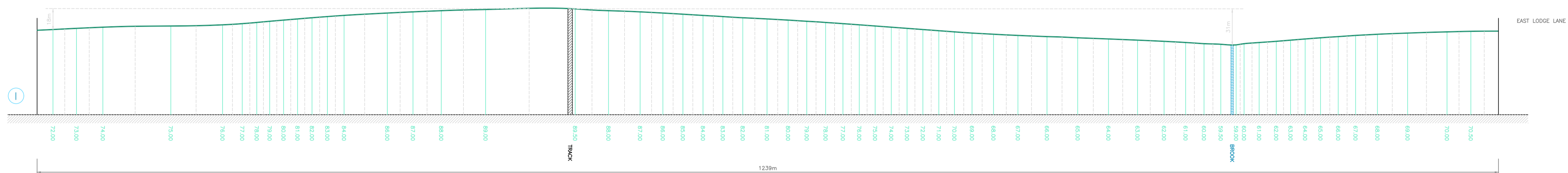
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SITE: **Enfield Chase enhancement hydrology and habitat**

TITLE: **Existing sections Sheet 3**

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|------------------------|----------------|--------------|----------------|
| SCALE AT A1: 1:2000 | DATE: 08-23 | DRAWN: HB | CHECKED: MG |
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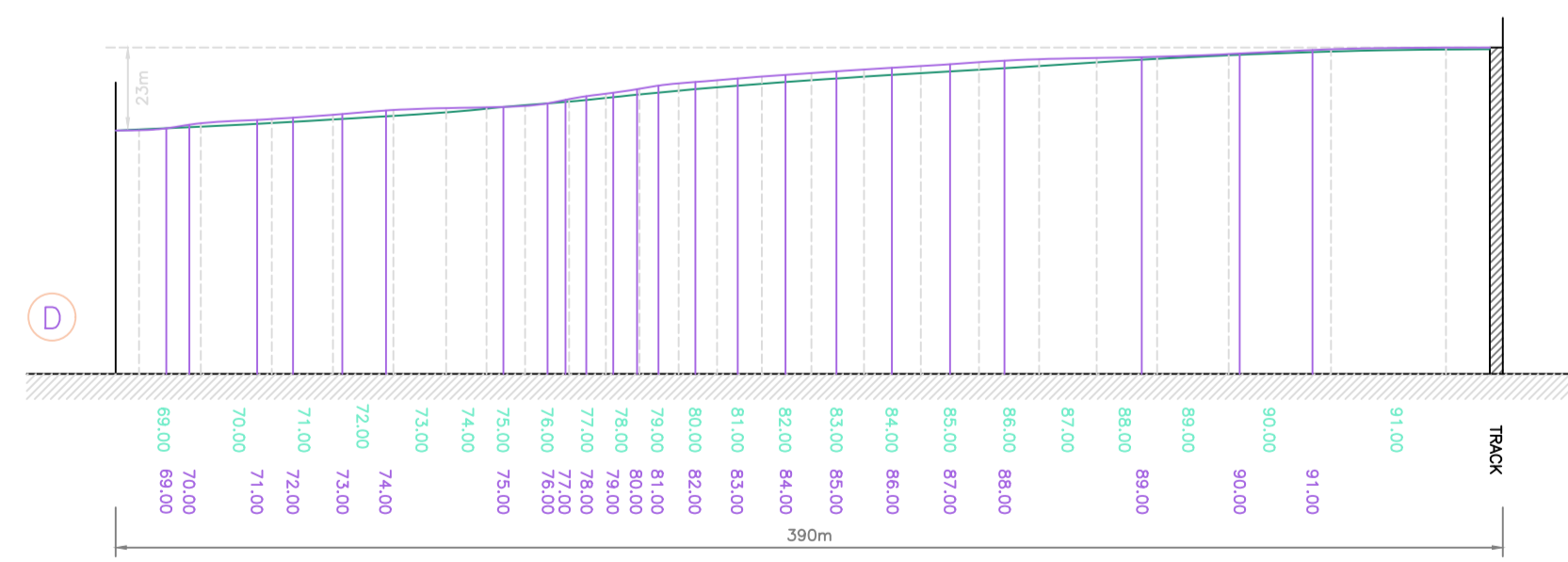
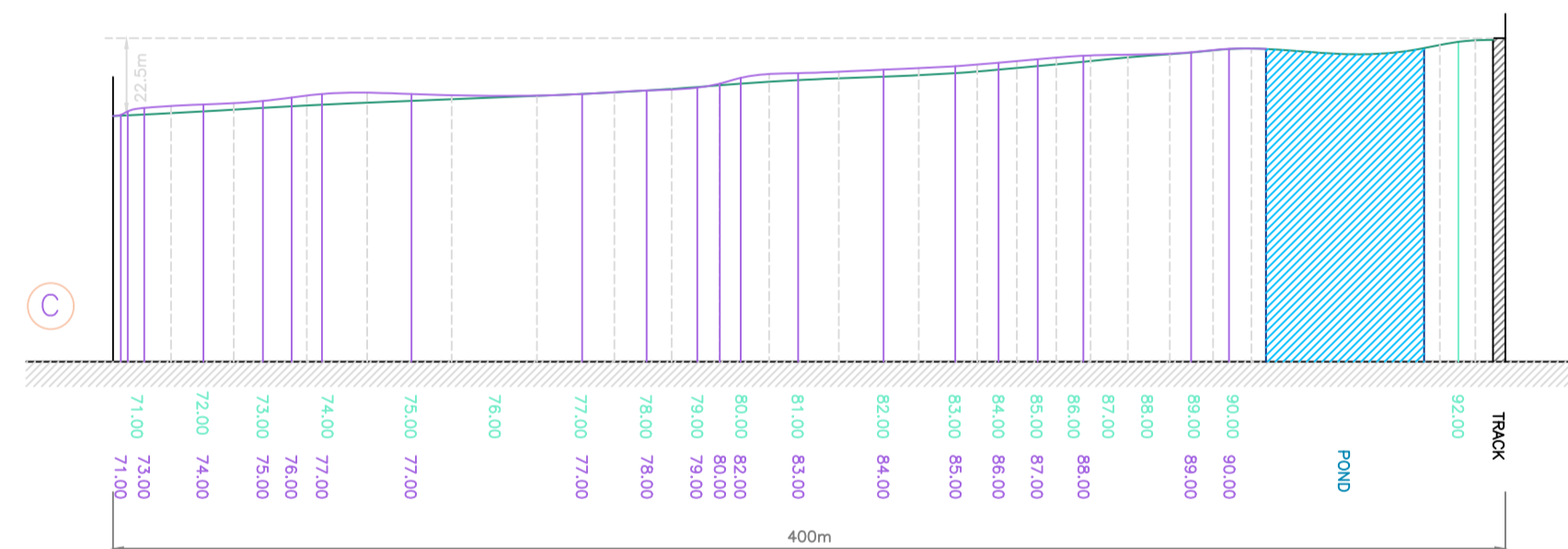
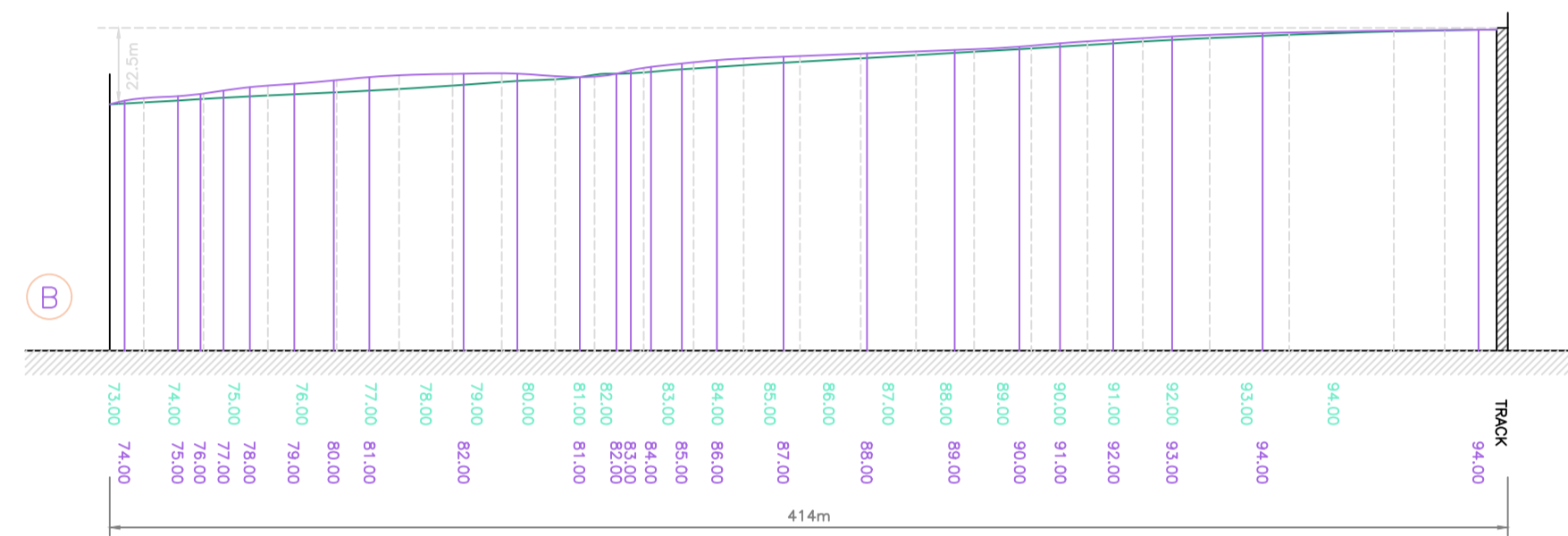
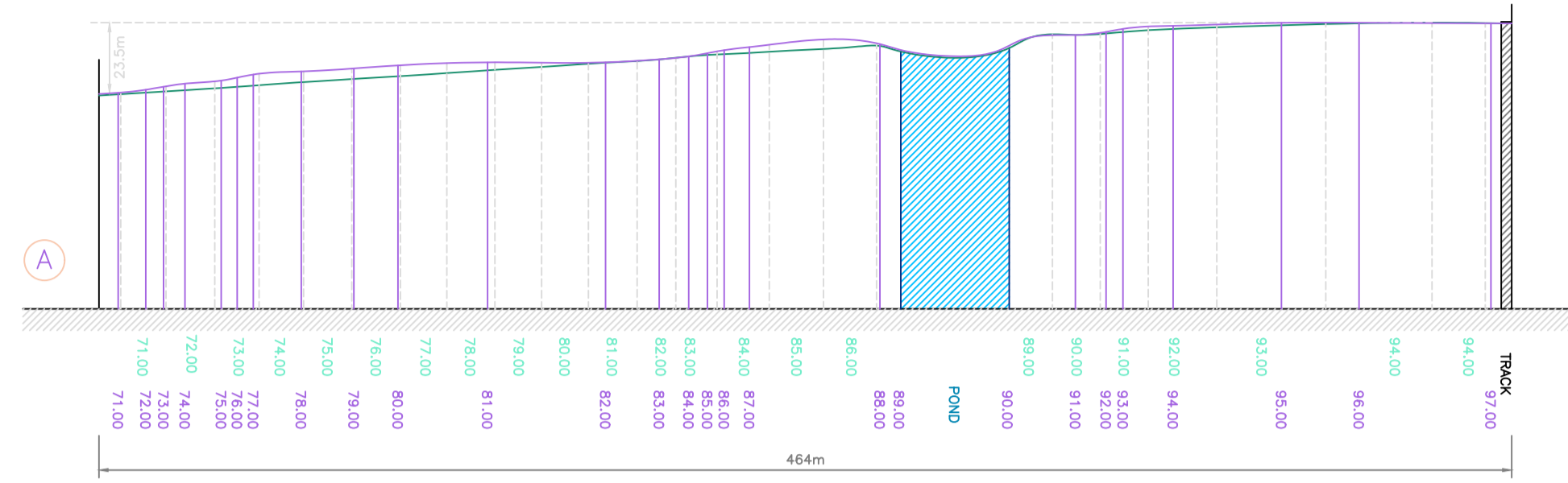
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| REV: | DESCRIPTION: | BY: | DATE: |
| STATUS: ISSUE | | | |
|  | | Icon Consulting Hethel Engineering Centre Chapman Way Norwich NR148FB 01953 857669 | |
| SITE: Enfield Chase enhancement hydrology and habitat | | | |
| TITLE: Existing topography | | | |
| SCALE AT A1: | DATE: | DRAWN: | CHECKED: |
| 1:2500 | 08-23 | HB | MG |
| PROJECT NO: | DRAWING NO: | REVISION: | |
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STATUS: ISSUE

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| | Icon Consulting |
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SITE: Enfield Chase enhancement hydrology and habitat

TITLE: Proposed sections Sheet 1

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| SCALE AT A1: 1:2000 | DATE: 08-23 | DRAWN: HB | CHECKED: MG |
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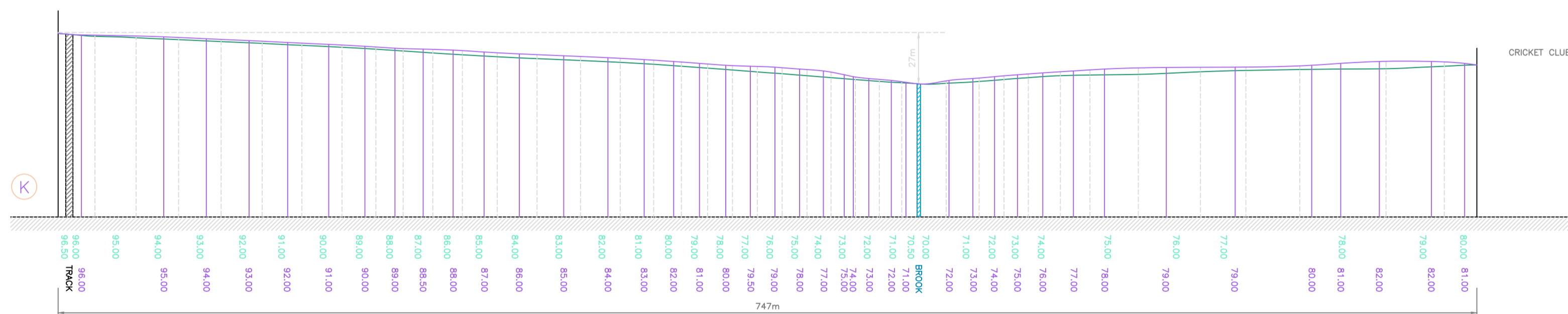
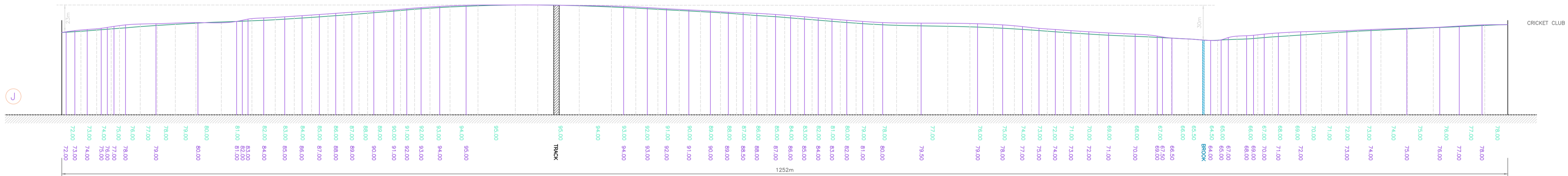
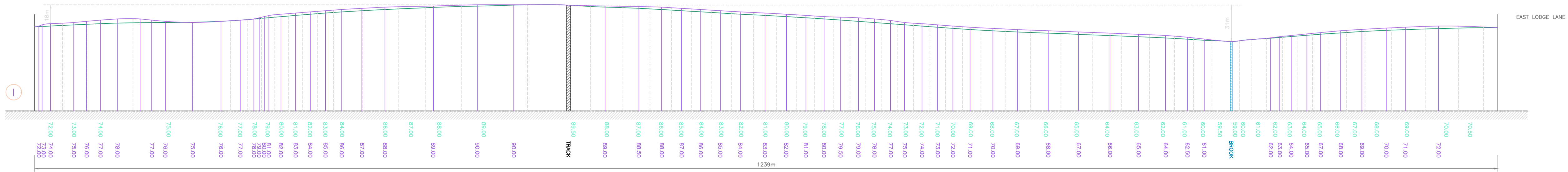
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| PROJECT NO: 3973 | DRAWING NO: ECHH.DG.010 | REVISION: A |
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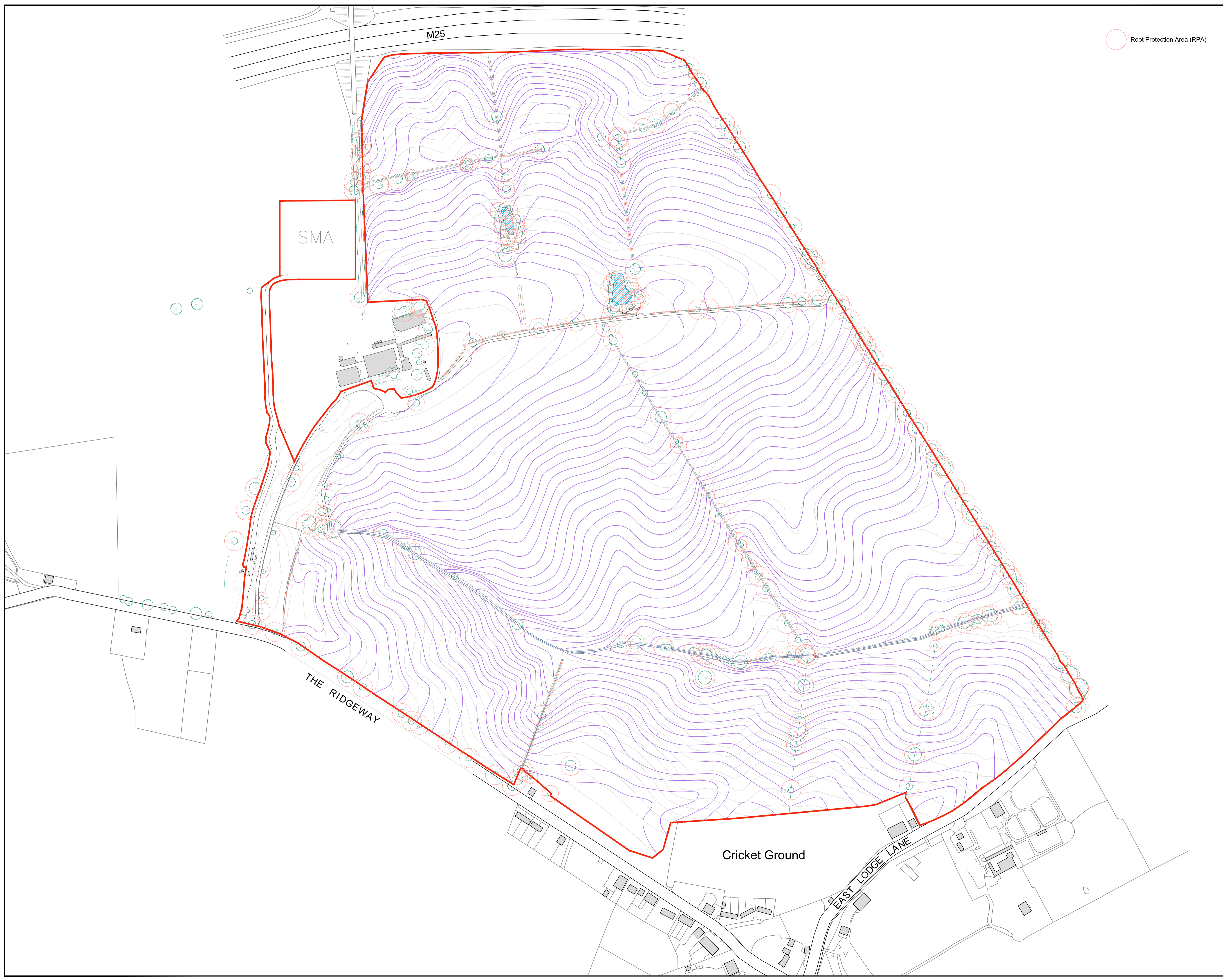
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| | Icon Consulting |
| | Hethel Engineering Centre Chapman Way Norwich NR148FB 01953 857669 |

SITE: Enfield Chase enhancement hydrology and habitat

TITLE: Proposed sections Sheet 3

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| SCALE AT A1: | DATE: | DRAWN: | CHECKED: |
| 1:2000 | 08-23 | HB | MG |

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○ Root Protection Area (RPA)

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| | |
|-------|-------------------------------------------------|
| SITE: | Enfield Chase enhancement hydrology and habitat |
|-------|-------------------------------------------------|

| | |
|--------|---------------------|
| TITLE: | Proposed topography |
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| SCALE AT A1: | DATE: | DRAWN: | CHECKED: |
| 1:2500 | 08-23 | HB | MG |

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| PROJECT NO: | DRAWING NO: | REVISION: |
| 3973 | ECHH.DG.009 | A |



- Root Protection Area (RPA)
- Habitat enhancement areas
- Retained agricultural use
- Grassland enhancement areas
- - - Permissive path (marked)

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STATUS: **ISSUE**

icon

Icon Consulting
 Hethel Engineering Centre
 Chapman Way
 Norwich
 NR148FB
 01953 857669

SITE: **Enfield Chase enhancement hydrology and habitat**

TITLE: **General arrangement Proposed**

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| SCALE AT A1: | DATE: | DRAWN: | CHECKED: |
| 1:2500 | 08-23 | HB | MG |

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| | Icon Consulting |
| | Hethel Engineering Centre Chapman Way Norwich NR148FB 01953 857669 |

SITE: Enfield Chase enhancement hydrology and habitat

TITLE: Section locations

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| SCALE AT A1: 1:2500 | DATE: 08-23 | DRAWN: HB | CHECKED: MG |
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Root Protection Area (RPA)

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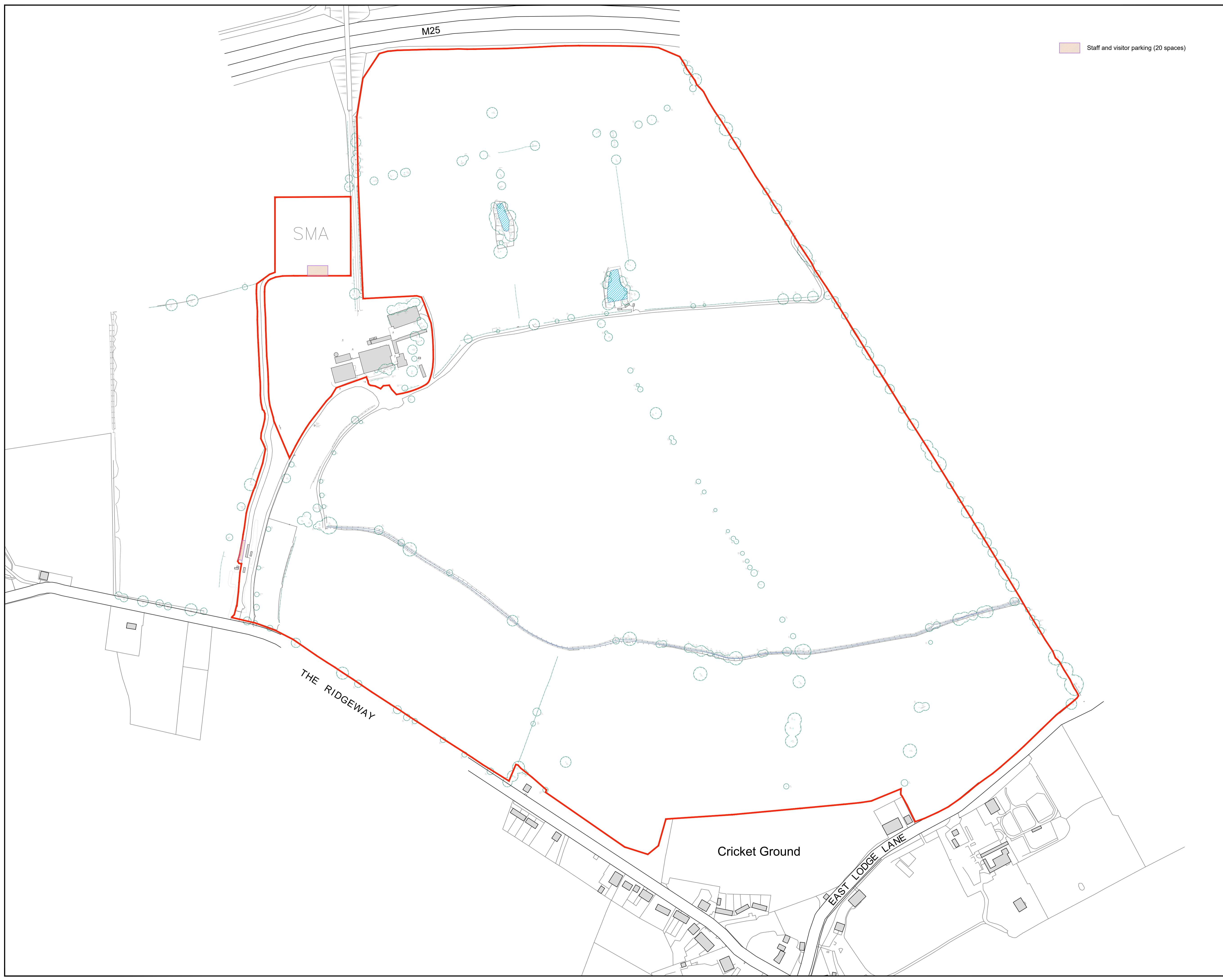
Icon Consulting
Hethel Engineering Centre
Chapman Way
Norwich
NR148FB
01953 857669

SITE: Enfield Chase enhancement hydrology and habitat

TITLE: Site layout including Root Protection Areas

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| SCALE AT A1: | DATE: | DRAWN: | CHECKED: |
| 1:2500 | 08-23 | HB | MG |

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Staff and visitor parking (20 spaces)

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 Chapman Way
 Norwich
 NR148FB
 01953 857669

SITE: Enfield Chase enhancement hydrology and habitat

TITLE: Staff and visitor parking

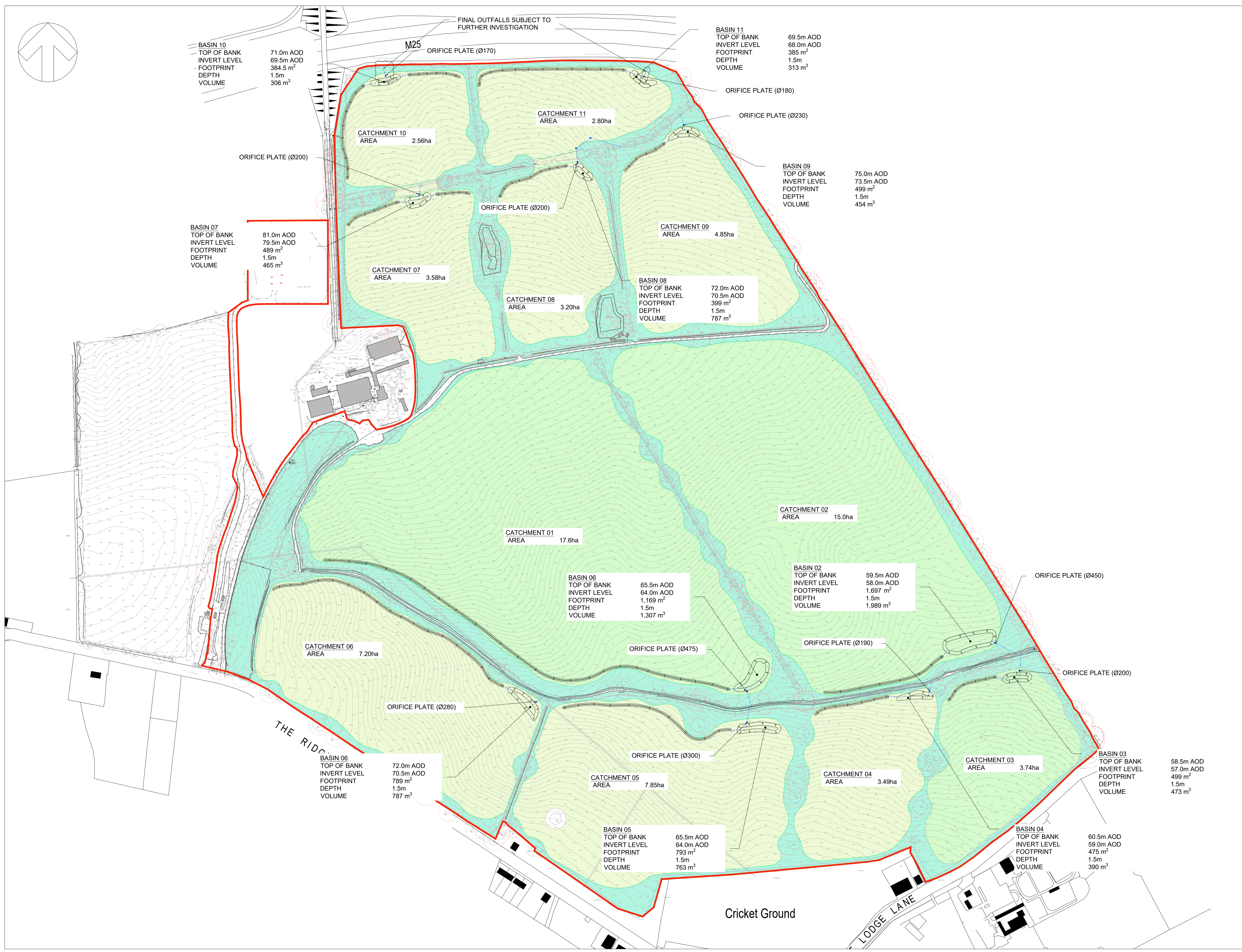
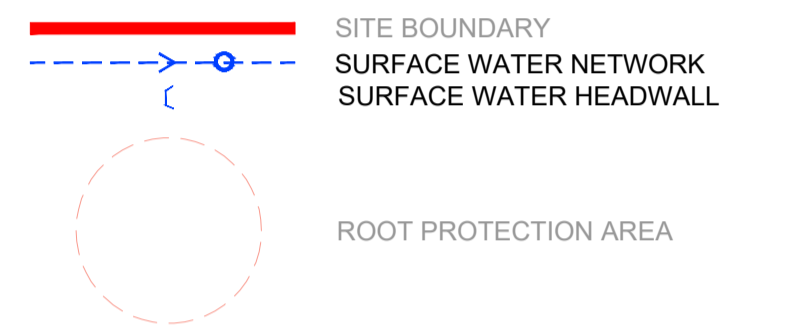
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DO NOT SCALE

NOTES:

1. ALL DIMENSIONS ARE IN MILLIMETRES (mm) AND ALL LEVELS ARE IN METRES ABOVE ORDNANCE DATUM (mAOD) UNLESS STATED OTHERWISE.
2. THIS DRAINAGE LAYOUT PLAN IS SUBJECT TO AN INTER-DISCIPLINE STANDARD REVIEW.
3. THIS DRAFT VERSION OF THE DRAINAGE LAYOUT PLAN SHOULD ONLY BE USED FOR COMMENT BETWEEN THE CLIENT AND THE DESIGNER. NO LIABILITY AS A RESULT OF THE USE OF THIS DRAWING FOR OTHER PURPOSES IS ACCEPTED.
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5. EARTHWORK SPACE REQUIREMENTS TO BE ASSESSED IN DUE COURSE.
6. HYDROLOGICAL ASSESSMENT UNDERTAKEN IN REF#2. ATTENUATION BASINS DESIGNED TO COPE WITH A 10% UPLIFT IN DIRECT-RUNOFF, IN COMPARISON TO BASELINE CONDITIONS.



GENERAL ARRANGEMENT
SCALE 1:2,500 @ A1

CWC-0043-DR-03

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|--------------------------------------------------------|-----------------|------------------|
| CLIENT: ICON PLANNING AND ENVIRONMENTAL | | |
| SITE/PROJECT: HOLLY HILL (PHASE 2) LAND REPROFILING | | |
| TITLE: SURFACE WATER DRAINAGE LAYOUT PLAN | | |
| SCALE @ A1: 1:2,500 | DESIGNED: JG | CHECKED: AC |
| STATUS: FOR COMMENT ONLY | | DATE: July 23 |
| DRAWING No: CWC269-DR-01 | | REV: P01 |
| CORNER WATER CONSULTING | | |

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