

## LONDON BOROUGH OF ENFIELD

### PLANNING COMMITTEE

**Date:** 18<sup>th</sup> June 2024

**Report of:**

Karen Page,  
Head of Planning and  
Building Control

**Contact Officer:**

Sharon Davidson,  
Planning Decisions Manager

David Maguire, Case Officer

**Category:**

Major

**Ward:**

Ponders End

**Councillor Request:**

N/A

**LOCATION:** John Wilkes House, 79 High Street, Enfield, EN3 4EN

**APPLICATION NUMBER:** 24/01102/RE4

**PROPOSAL:** Temporary change of use of the existing John Wilkes House office building (class E(g)(i)) to a hostel for residential accommodation for 36 single homeless men (sui generis), including reinstatement of 1no window and minor modifications to 6no windows.

**Applicant Name and Address:**

Richard Sorenson / Amena Matin  
Housing, Regeneration and Development  
London Borough of Enfield  
Civic Centre, Silver Street  
Enfield, EN1 3ES

**Agent Name and Address:**

N/A

**RECOMMENDATION:**

- 1) That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992 the Planning Decisions Manager be authorised to **GRANT** consent subject to conditions.
- 2) That the Planning Decisions Manager be authorised to make any alterations, additions or deletions to the recommended conditions as set out in this report.

Ref: 24/01102/RE4    **LOCATION:** John Wilkes House, 79 High Street, Enfield, EN3 4EN



Project: John Wilkes House  
79 High Street, EN3

Title: Site Location Plan

Scale: 1: 1,250

Date: November 2023

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## 1. Note for members

1.1 This application is submitted by the Council's housing services team. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

## 2.0 Recommendation

- 1) That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992 the Planning Decisions Manager be authorised to **GRANT** consent subject to the following conditions:
  1. Time limited, temporary permission, for a five-year period.
  2. Development to be carried out in accordance with the approved plans and documents.
  3. Prior to occupation, the development shall achieve Crime Prevention Standards submitted to and approved in writing by the LPA, in accordance with the Metropolitan Police.
  4. Sustainable drainage features are to be installed where practicable, prior to occupation.
  5. Appropriate secure, covered cycle parking is to be installed, prior to occupation.
  6. Appropriate refuse and recycling storage provision must be in place, prior to occupation.
- 2) That the Planning Decisions Manager be authorised to make any alterations, additions or deletions to the recommended conditions as set out in this report.

## 3.0 Executive Summary

3.1 The report seeks approval for 'temporary change of use of the existing John Wilkes House office building (class E(g)(i)) to a hostel for residential accommodation for 36 single homeless men (sui generis), including reinstatement of 1no window and minor modifications to 6no windows.'

The reasons for recommending approval are:

- i) The proposed development would provide specialist accommodation for homeless people, for which there is an identified need in the London Borough of Enfield.
- ii) The proposal would make use of the existing vacant office building, for a temporary five-year period, providing a beneficial meanwhile use.
- iii) The proposal raises no design or transportation considerations which would render the proposal unacceptable.
- iv) The applicant will work with Metropolitan Police Designing Out Crime officers to ensure that the premises are appropriately safe and secure.

## 4.0 Site and Surroundings

4.1 The application site incorporates John Wilkes House, a predominately two-storey, flat-roofed, Council-owned, vacant office building, which was last in temporary use as a rapid testing and recovery centre during the Covid-19 pandemic. The building is designated for office use, and until 2019 it was an office for the Council's housing advisory services who support homeless households.

- 4.2 John Wilkes House is located on the corner of High Street (A1010) and Orchard Road in Ponders End. It has a main entrance on the northern flank off Orchard Road, with additional entrances at the southern side. To the south of the building is a retail park, with associated car parking, which accommodates branches of Asda and Poundland supermarkets, for example. To the north, east and west of the site there are residential dwellings on Orchard Road and on High Street.
- 4.3 The applicant states that there are 14 parking bays to the southern side of the site which were conferred to John Wilkes House in 1984 under a covenant in the transfer of a land title.
- 4.4 The applicant states that the site, including the associated parking space, has an area of 1280 square metres. They state that the ground floor of John Wilkes House has a gross internal area of 577 square metres, and that the first floor has a gross internal area of 486 square metres.
- 4.5 The building is within the Ponders End local centre, and within Flood Zone 1. It is not a listed building, it does not lie within a Conservation Area. There is a zebra crossing across the high street at the front of the building and there are also street trees and small bollards around the site frontage. The site lies within the lower rate eastern zone for CIL.

## **5.0 Proposal**

- 5.1 Permission is sought for the temporary change of use of the existing class E(g)(i) office building to a hostel for residential accommodation for 36 single homeless men (sui generis), including for the reinstatement of one window and minor modifications to six windows.
- 5.2 The proposed scheme would create 36 single rooms, described as pods, to temporarily house homeless men, as well as shared kitchens and bathrooms, communal areas for residents, and office space for staff who will provide welfare support services to residents. This will be a short-stay facility which the applicant describes as providing a 'Rapid Assessment and Resettlement Service'.
- 5.3 It should be noted that the hostel will not operate as a 'walk-in' facility. The applicant states that the Council's specialist housing team will make suitable referrals into the facility and that a robust risk-assessment will be carried out prior to the arrival of each resident, to ensure that the resident is considered as 'low-risk'. Residents will be aware that the facility provides a temporary housing placement, and they will also be required to commit to engagement with staff who will assist them in securing subsequent housing solutions.
- 5.4 The applicant states that there will be at least four staff onsite at any one time, working in a shift pattern on a 24-hour basis. There will be a reception desk at the ground floor entrance, and the site will be monitored by CCTV.

## 6.0 Planning History

AD/99/0096 - Provision of free standing double sided illuminated advert panel on supporting pole with an overall maximum height of 5.2m (size of overall illuminated panel structure 3.9m width x 2.2m length). Sign to be located on frontage facing High Street – Granted with conditions, 08/12/99.

LBE/05/0030 - Single storey extensions to sides to form new entrance area and covered fire escape together with installation of replacement windows throughout and partial cladding – Granted with conditions, 24/01/06.

## 7.0 Consultation

### 7.1 Statutory and non-statutory consultees

Environmental Health officers raise no objection to the proposal and state that ‘there is unlikely to be a negative environmental impact.’

Sustainable drainage systems (SuDS) officers state that ‘Source control SuDS measures must be utilised for this development.’ They note that the installation of a small planter or rainwater harvesting butt would be sufficient for this development.

Climate Action and Sustainability officers comment that the change of use and retention of the existing building is welcomed from a climate action perspective, due to the embodied carbon savings. However, in their view the submitted proposal does not include fabric efficiency measures or energy supply improvements to the building.

Thames Water raise no objection to the proposal. They have provided informative details, for example regarding surface water drainage and water pressure, which could be added to a decision notice.

The Metropolitan Police met with the applicant and their design team to discuss crime and security matters regarding this proposal. Further to this discussion, were permission to be granted, in the interest of creating safer, secure, sustainable communities, they recommend a condition be imposed requiring that, prior to occupation, the premises achieve Secure By Design accreditation. This condition will need to be approved in writing by the Local Planning Authority, in conjunction with the Metropolitan Police. A condition is included in the recommendation section above.

Traffic and transportation officers state that the proposed development is unlikely to have a negative impact on existing on-street parking availability and that it makes appropriate provision for access and servicing. A condition is requested regarding the installation of four secure and covered cycle parking spaces and a condition is included in the recommendation section above.

Commercial waste officers, Energetik (District Heat and Power Network), Economic Development officers, and Employment and Skills officers were consulted, and no comments have been received to date. Any further consultee comments received will be reported at the committee meeting.

## 7.2 Public consultation

210 neighbouring properties were notified directly by letter, a site notice was displayed, and the application was advertised in the Enfield Independent. The consultation period ended on 20/05/24. 30 separate objections have been received and some of these have been submitted multiple times. One objection letter has been received from 'The Residents, Orchard Road'. In summary, the matters raised by objectors include:

- Concern regarding impacts on crime and anti-social behavior near the site and a perception that crime and anti-social behavior would increase, to the detriment of community safety, were the hostel to be permitted.
- Concern regarding the safety of women and girls in the vicinity of the hostel.
- Concern about health and wellbeing impacts on children, the elderly and vulnerable members of the community.
- Concern regarding detrimental impact upon community cohesion.
- Concern that residents of the hostel will put increased pressure on local healthcare services.
- Detrimental impact on privacy.
- Increased traffic and congestion.
- Increased parking stress in the vicinity.
- Increased noise disturbance.
- Concern regarding increased litter in the area.
- Concern that the hostel will detrimentally impact upon the character of the area. The area is already deprived and there is a perception that an 'influx of more homeless people' doesn't help.
- General dislike of the proposal in this location.
- Overconcentration of accommodation for transient people.
- Lack of clarity regarding the length of time of temporary use. The query is raised, 'What may happen if this is found not to be a feasible proposal?'
- Lack of clarity regarding details of operation for the hostel.
- Concern that the users of the hostel 'will be attracted into the park'.
- Further information needed: A query is raised as to why this hostel is only for male occupancy.
- Overdevelopment
- Quality of accommodation. 'The facilities look extremely cramped'.

Officer comment: The matters raised will be addressed in the analysis below.

The following non-material considerations are additionally referred to by objectors and these considerations are not relevant within the context of a planning assessment.

- Concern regarding detrimental impact of development on property values.

## 8.0 **Relevant Policies**

### 8.1 National Planning Policy Framework (2023)

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.

The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

In relation to achieving appropriate densities paragraph 128 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.

Paragraph 48 of the NPPF details when weight may be given to the relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objection and the degree of consistency of relevant policies to the Framework are relevant.

The NPPF 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 (8), granting permission unless:
  - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed); 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.

The Council's recent housing delivery has been below Enfield's increasing housing targets. This has translated into the Council being placed in the "presumption in favour of sustainable development category" by the Government through its Housing Delivery Test. Therefore, the 'tilted balance' is engaged. According to the NPPF this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole which also includes the Development Plan.

## 8.2 The London Plan (2021)

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

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D14 Noise
- H3 Meanwhile use as housing
- H12 Supported and specialised accommodation
- S1 Developing London's social infrastructure
- SD6 Town centres and high streets
- S112 Flood risk management
- S113 Sustainable drainage
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking

## 8.3 Enfield 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. The following policies are considered particularly relevant:

- CP2 Housing supply and locations for new homes
- CP4 Housing quality
- CP5 Housing types
- CP6 Meeting particular housing needs
- CP17 Town centres
- CP19 Offices
- CP22 Delivering sustainable waste management
- CP24 The road network



CP25 Pedestrians and cyclists  
CP28 Managing flood risk through development  
CP30 Maintaining and improving the quality of the built and open environment  
CP36 Biodiversity  
CP41 Ponders End

#### 8.4 Enfield Development Management Document (2014)

The Council's Development Management Document (DMD) provides further policies by which planning applications should be assessed. Policies in the DMD support the delivery of the Core Strategy. The following DMD policies are considered particularly relevant:

DMD15 Specialist housing needs  
DMD22 Loss of employment outside of designated areas  
DMD23 New employment development  
DMD28 Large local centres, small local centres and local parades  
DMD37 Achieving high quality and design-led development  
DMD38 Design process  
DMD45 Parking standards and layout  
DMD47 Access, new roads and servicing  
DMD49 Sustainable design and construction statements  
DMD50 Environmental assessment methods  
DMD51 Energy efficiency standards  
DMD58 Water efficiency  
DMD59 Avoiding and reducing flood risk  
DMD60 Assessing flood risk  
DMD61 Managing surface water  
DMD68 Noise

#### 8.5 Draft Enfield Local Plan Status

Between 28 March and 20 May 2024, the Council undertook Regulation 19 Consultation on the Enfield Local Plan 2019-2041. 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. For example, a policy that receives few objections at the Regulation 19 consultation can be given more weight than a policy that receives many objections. As such, policies must be considered on a case-by-case basis for larger schemes during the consultation and examination period and the weight given to specific policies must be determined at the time a decision is made. Enfield's adopted Development Plans remain the starting point for decision taking until the new Enfield Local Plan is adopted.

### **9.0 Assessment**

The main planning issues raised by the proposed development are:

1. The principle of development in this location and housing need
2. Quality of accommodation
3. Transport and parking matters
4. Impact upon the amenity of neighbours
5. Crime, security and Metropolitan Police involvement

## 6. Sustainability

### 9.1 Principle of development and housing need

- 9.1.1 The Homelessness Act 2002 places a duty on local authorities to formulate a homelessness strategy, which must include provisions for securing satisfactory support for people who are homeless or those who have been housed and who need support to prevent them becoming homeless again.
- 9.1.2 Enfield Council's homelessness strategy 'Ending Homelessness in Enfield: Preventing Homelessness and Rough Sleeping Strategy 2020-2025' states that, 'Homelessness has become a national emergency and in no place is this clearer than Enfield... Since 2011/12 homelessness has increased by 246% in the borough. At March 2019, Enfield had 3,410 households in temporary accommodation, a 74% rise since 2012.'
- 9.1.3 More recently Enfield has recently been experiencing a particularly acute homelessness crisis and rough sleeping levels in Enfield remain high for outer London boroughs.<sup>1</sup> As reported by the Enfield Dispatch on 30<sup>th</sup> April 2024, rough sleeping has also risen across London by 33% in a year.<sup>2</sup>
- 9.1.4 This application, which is made by Enfield Council's Housing Services team, is supported by a statement which clarifies that accommodation for homeless persons is 'currently at crisis point, fuelled by rising demand and the collapse of available private sector properties, especially at the affordable end of the market.'
- 9.1.5 John Wilkes House is a currently vacant former office building. The Council is going through a period of cost-cutting, in an effort to balance an overall budget which has recently been hit hard due to factors including the increased cost of servicing debt since the National Government mini-budget of September 2022, and the extensive cost of paying for temporary accommodation, for example in hotels and B&Bs, to support people and families waiting to be housed. Given this financial backdrop, the Council has no current plans to re-open John Wilkes House as an office. Instead, the proposed approach is to refurbish and make use of the vacant building to provide a Rapid Assessment and Resettlement Hub for 36 homeless men, following the established and successful 'Somewhere Safe To Stay Hub' model. The applicant states that the proposed facility 'enables Enfield to continue housing and supporting rough sleepers whilst addressing cost pressures' and that 'the conversion from office use to a hostel would reactivate the building which is currently empty, whilst minimising costs by retaining the existing structural integrity of the building and undertaking minimal intrusive work, enabling a swifter solution to the growing housing crisis'.
- 9.1.6 The applicant states that, 'If left unabated at current levels the use of hotel accommodation and local nightly paid accommodation will increase substantially over the next five years. Further, these costs are volatile and increases, over which we have limited control, may be seen over the period as we expect to see further withdrawal by landlords from the LHA (local housing allowance) market. The alternative proposed by this strategy is that we bring more accommodation under the Council's direct control, through ownership or lease, giving increased certainty and providing greater resilience against price fluctuations in the private rented sector.'

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<sup>1</sup> <https://trustforlondon.org.uk/data/rough-sleeping-borough>

<sup>2</sup> 'New statistics covering January to March of this year show that 4,118 people spent at least one night sleeping rough in the capital, a 33 per cent rise from the 3,107 people recorded in the same period of 2023'. Rough sleeping across London up by 33% in a year, Enfield Dispatch, 30 April 2024.

- 9.1.7 The applicant also states that ‘a 36-bed Rapid Assessment and Resettlement Hub will generate annual savings or cost avoidance of circa £1m which is currently incurred by the Council’s statutory duty to house 36 single persons based on an £85 per night temporary accommodation cost.’ Making budget savings helps the Council to deliver essential services that residents need and will help to enable the Council to deliver sustainable housing solutions in future.
- 9.1.8 It should be noted that residents will have a variety of reasons for becoming homeless such as landlords selling properties and the end of private tenancies, unaffordable rent increases resulting in arrears, family/friend ejections and relationship breakdowns.
- 9.1.9 London Plan policy H12 on supported and specialised accommodation states that, ‘the delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported.’ Enfield Core Policy 19 notes that the conversion of surplus offices into other uses will be supported, where it can be demonstrated that there is no demand for office use. The proposed hostel will be situated in a local centre high street location, with good access to shops and public transport, which will be of benefit to the staff and residents of the hostel.
- 9.1.10 The application is accompanied by a marketing assessment which explains that since October 2022, the Council have not had any interest from tenants looking to let John Wilkes House as office space at an asking rent of £150,000 per annum. One offer was received, which proposed to use the ground floor as a tile/flooring showroom and to sublet the first floor to a children’s day centre, and to a community user group. According to the marketing statement, ‘Unfortunately, one of the sub tenants withdrew and another business venture failed that led to the bidder withdrawing their interest.’ Furthermore, the property was placed back on the market in summer 2023 and a new offer was received from a religious institute to meet the asking rent, but at a reduced term. It is stated that, ‘The proposal would have required significant investment and configuration by the Council to enable this and therefore the offer has not progressed.’ The marketing assessment demonstrates a lack of demand for the building as office space and ultimately the applicant is proposing that the building would be best used as a ‘Rapid Assessment and Resettlement Hub’ to accommodate homeless men, and they have therefore made this planning application to this end. The Council is committed to helping and supporting vulnerable members of society and by opening this facility would endeavour to provide a warm, clean bed for people in need, who are referred into the facility.
- 9.1.11 Objectors have queried why this facility is for occupancy by single men and the case officer sought further detail from the applicant on this point. Further to this, the applicant has clarified that there are a range of housing services provisions which cater for different groups and their needs and that recent provision has been created for homeless single mothers, for example. Single homeless men are currently in priority need in Enfield and the facility is not proposed as mixed gender accommodation, for reasons of management and safeguarding. The applicant notes that the facility is ‘intended to accommodate homeless single men who have been found to be in priority need by the Council, who have access to public funds, and who have a local connection with Enfield. The model will not be a walk-in service and the specialist housing team will make suitable referrals into the Hub. A robust risk assessment will be carried out prior to the resident’s occupation, ensuring that the resident is low-risk and committed to engagement. New residents will be required to sign a resident service agreement that outlines the standard of behaviour expected and the terms and conditions they must adhere to during their short stay. The facility will offer short-term accommodation (generally for up to 5 to 6 weeks)’. It is also stated that residents will have structured plans in place for their daily activities and

that Council support staff will assist residents to access employment advice, benefits advice, and make referrals to partner specialist support agencies in order that residents may secure subsequent private rented accommodation, for example. The applicant states that, 'Residents with any criminal history or with alcohol/substance abuse issues will need to have been assessed as low risk and be linked in with recovery services'. Failing this, they will be directed to alternative accommodation supported by our partner agencies such as All People All Places (APAP) or Rough Sleeping Accommodation Programme (RSAP).' Officers consider that 36 new residents in the locality will have minimal impact upon local infrastructure.

9.1.12 The change of use is requested for a temporary period of five years, which is enough time to justify investment in the premises by the Council and will also allow for a re-evaluation of the need for this form of housing within a reasonable timeframe. It must be re-stated that Enfield is experiencing an acute crisis of homelessness, and this development proposal is presented to planning committee in this context. Officers consider that the proposed facility meets an identified need, and on this basis the proposal should be supported.

## **9.2 Quality of accommodation**

9.2.1 There are no policies that specify residential standards for this type of facility. However, some consideration has been given to guidance provided by the charity Shelter '*Accommodation standards and costs for homelessness accommodation*'. This also points to the Governments' Homelessness Code of Guidance, which stresses that hostels offer short-term accommodation. The guidance goes on to state that '*Refuges should normally be used only as a temporary measure and only for people who wish to stay in one*'.

9.2.2 This being acknowledged, by partitioning and dividing the existing internal space, the proposal would provide 36 individual private rooms or pods, across the ground and first floors of the building. In terms of gross internal area, all of these rooms would exceed London Plan space standards for single person occupancy (that is, all bedroom pods have a gross internal area of more than 7.5sqm) and many of the rooms would exceed minimum floorspace standards for double bedrooms (that is, floorspace of at least 11.5sqm). The submitted site photographs show that there are windows present on the three main sides of the building (front and two flanks) at ground and first floor level, and most of the occupants of the proposed facility would therefore benefit from sufficient natural light and outlook.

9.2.3 The physical appearance of the building is not proposed to be substantially altered. Primarily, this planning application concerns change of use and the main physical interventions involve proposed internal re-configuration. For clarity, the applicant states that 'A former window on the east elevation is to be reinstated to provide natural light to one pod. No overlooking or loss of privacy arises to the adjacent dwelling. The existing windows are double glazed and in good condition. However, some minor reconfigurations are required to allow for subdivision of the space into pods and to provide openable windows to all pods for ventilation. Where subdivision in the location of an existing glass pane is required and no mullion is present, a solid PVC panel is proposed allowing the pod wall to be built up to the window. This still provides sufficient natural light from the openable panes above/to the side and is an easily reversible modification for any future change in use/layout of the building. Where subdivision of the space by pod walls results in there being no openable window pane to the pods, an openable pane will be added. These changes are annotated on the elevations.'

9.2.4 Furthermore, toilet and shower facilities as well as communal kitchens, a laundry and a 'living hall' space are to be provided for residents. A private disabled-persons WC will also be provided on the ground floor. The applicant notes that the main entrance to the building (on Orchard Road) is already provided with a ramp giving level ground floor access, and that the existing lift is operational and useable for disabled access. It is noted that the larger pods are suitable for wheelchair access and that wide corridors and wheelchair turning areas will be delivered. Appropriate office space for use by four members of staff will also be provided. The building has a fire escape stair from the upper floor, the conversion of the building will require building control certification, and the applicant will establish appropriate procedure to safeguard residents and staff in the event of any fire.

9.2.5 The applicant notes that 'our average move-on time for single people is 31 days. The intention is for this to be short-term accommodation and for people to stay for very limited periods of time. It is not intended to be used as a permanent home and the nature of the accommodation reflects this.'

9.2.6 Overall, officers are satisfied that a sufficiently good quality of accommodation will be provided by this facility and that the rooms and service at the hostel will provide a safe place to stay for people who find themselves in need of support.

### **9.3 Traffic, transportation, parking, and refuse provision**

9.3.1 The site has PTAL 3, meaning it has a good level of accessibility via public transport, and it is not within a controlled parking zone (CPZ).

9.3.2 Traffic and transportation officers state that the proposed use as a Rapid Assessment and Resettlement Hub for homeless men does not have a specific parking requirement set out in the London Plan or in local policy. They state that use as a hostel is unlikely to generate a high level of parking demand from the residents of the hostel, as they are unlikely to own a vehicle, and no concerns are raised about traffic impacts. It is noted that staff numbers for the hostel will be lower than were staff numbers for the existing office, when it was in use. The site provides 12 parking spaces and 2 disabled parking spaces, and this is acceptable to serve the proposed facility.

9.3.3 The applicant notes that 'Residents will not be permitted to have visitors at the property therefore the building will only be used by residents, staff and other relevant professionals.'

9.3.4 It is noted that no changes will be made regarding vehicular access to the site, the layout of the existing parking spaces will remain the same, and pedestrian access will also remain the same. The applicant states that 'Postal deliveries will be taken in by staff on the main manned reception' and transportation officers raise no concern regarding deliveries to the hostel, or regarding servicing.

9.3.5 The applicant notes that the arrangement for refuse collection will remain as the previous use, with commercial Eurobins located on Orchard Road for street collection, and it is stated that the hostel will have an Enfield Council waste collection contract. It will be required by condition that appropriate refuse and recycling provision is in place, prior to the occupation of the hostel.

## **9.4 Impact upon neighbouring amenity**

- 9.4.1 Officers note that a relatively large number of objections to this planning application have been received from nearby residents who are concerned that an 'influx' of homeless men into the immediate area will be detrimental to quality of life for existing residents in the area, and also to the general appearance of the area as a whole. With regard to the issue of perceived potential increases in anti-social behaviour, which may be linked to or perpetrated by residents of the proposed facility, the applicant states that, 'before any placement is made, a full assessment is carried out as to the suitability of the placement' and that people who are placed into the Hub are expected to want the help and support of the service. Therefore, breaching the terms of the residential service agreements that residents will be required to enter into, through anti-social behaviour for example, is not in the interests of residents. As will be described below, the applicant is working alongside Metropolitan Police Service Designing Out Crime officers to help to ensure that the facility is as safe and secure as possible. It is again reiterated that this hostel is not a 'walk-in' service and that the hostel will house people who have been referred to the service by specialist staff.
- 9.4.2 Not discounting the concerns expressed in the objections received, John Wilkes House is situated in a high street location near shops and amenities, and it is situated in an area in which comings and goings naturally take place. The building was formerly used as an office and as a workplace and, although there are houses nearby, it is not situated on a wholly residential street. There are buildings in a mix of uses in the immediate vicinity.
- 9.4.3 It should also be noted that Environmental Health officers have raised no objection to this application. They have no concerns regarding noise, for example.
- 9.4.4 The building will be staffed on a 24-hour basis, and the residents are proposed to be housed in a caring and supported environment. Unfortunately, homeless people regularly experience prejudice and discrimination and it is important that the Council provide services to support homeless people, also in accordance with legal responsibility.
- 9.4.5 This proposal involves re-purposing a vacant Council-owned building to provide accommodation and support services for homeless men. The applicant states that they have necessary procedures in place as part of their 'Residents Service Agreements' to ensure that residents do not congregate on the streets around the hostel. The applicant runs an existing 'Somewhere Safe to Stay Hub' within the borough and they have not had significant issues with anti-social behaviour at this site.
- 9.4.6 Concern is raised by objectors that some occupants of the facility may be attracted into the nearby park, and the perception is that this could lead to anti-social behaviour in the park. Some residents of the proposed facility may use the park, but public parks are for use by all members of society and, essentially, the Council is proposing to house 'ordinary people' in need, who should not be distinguished as being separate to other people in society. It is also noted that taking action in the event of anti-social behaviour is primarily an issue for the Police, rather than for the planning process.
- 9.4.7 The proposed external physical changes to the existing building are very limited and therefore there are no loss-of-light or overshadowing impacts. In terms of the amenity of immediate neighbours, one currently boarded-over window will be brought back into use at the rear of the site, to provide natural light to pod 10. This will not result in harmful overlooking of property at 1 Orchard Road, for example, as demonstrated by the section drawing on the proposed elevations plan.

## **9.5 Crime, security and Metropolitan Police involvement**

- 9.5.1 Policy DMD37 states that all development should create safe and secure places and comply with the principles of Secure By Design. The applicant notes that the site will be staffed on a 24-basis and that the site will be monitored by CCTV.
- 9.5.2 Metropolitan Police Designing Out Crimes officers were consulted on this application and they have requested that a condition requiring 'Secure By Design' security standards be applied to any grant of consent.
- 9.5.3 The case officer was also present at a meeting with the applicant and Metropolitan Police Designing Out Crime Officers, in which the applicant acknowledged the importance of an appropriately safe and secure site. This means CCTV must be installed to the standards advised by the police, and that doors, windows and relevant internal partitions are appropriately safe and secure, and also that the site has appropriate lighting in place. The applicant is willing to work with the Metropolitan Police to ensure that security measures are of a good and appropriate standard, prior to the occupation of the proposed hostel so that Secure By Design accreditation may be achieved.

## **9.6 Environmental sustainability and biodiversity**

- 9.6.1 The Council's climate action and sustainability officer states that the change of use and retention of the existing building is welcome from a climate action perspective, due to the embodied carbon savings. Some concern is raised by the climate action officer that the submitted proposal does not include building fabric efficiency measures or energy supply improvements.
- 9.6.2 However, the submitted design and access statement explains that the building will make use of low-emission LED lights and that the existing PV array on the roof, which is currently not functional, will be recommissioned with the power provided subsequently reducing the building's CO2 emissions. It is also noted that the proposal is for temporary change of use and that the building offers flexibility for future adaptation and change of use. On balance, this is an acceptable approach to energy efficiency for this proposed temporary Hub.
- 9.6.3 It is noted that, in accordance with the Environment Act 2021, the development proposal is exempt from Biodiversity Net Gain delivery requirements. This is because the development does not impact an onsite priority habitat and because no change to the footprint of the building is proposed by this development.

## **9.7 Sustainable drainage**

Sustainable drainage systems (SuDS) officers have stated that source control SuDS measures must be utilised for this development. They note that the installation of planters or rainwater harvesting butts would be sufficient for this development. A condition is recommended to ensure that these sustainable drainage enhancements are delivered, prior to the occupation of the hostel.

## **10.0 Community Infrastructure Levy (CIL)**

As there is no new floor space created by the proposal, there is no liability to make a contribution under the CIL Regulations.

## 11.0 Equalities Impact

- 11.1 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.
- 11.2 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).
- 11.3 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.
- 11.4 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.
- 11.5 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.
- 11.6 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.



## **12.0 Conclusion and recommendation**

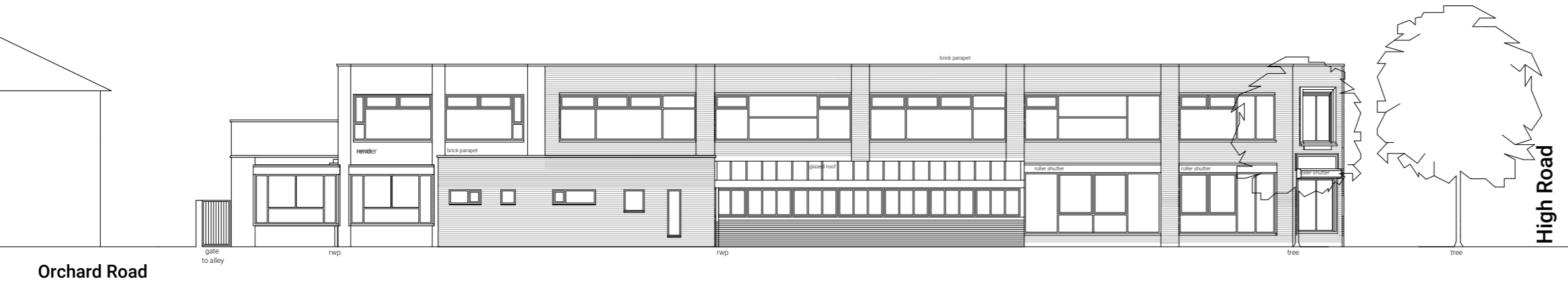
12.1 Having regard to the above assessment, to adopted policy, and to the presumption set out in the National Planning Policy Framework (NPPF) in favour of sustainable development, officers are of the view that the benefits of the scheme would outweigh any harm that it may cause. Given this, it is recommended that the development proposal is approved, subject to conditions.

The reasons for recommending approval are:

- i) The proposed development would provide specialist accommodation for homeless people, for which there is an identified need, in the London Borough of Enfield.
- ii) The proposal would make use of the existing vacant office building, for a temporary five-year period, providing a beneficial meanwhile use.
- iii) The proposal raises no design or transportation considerations which would render the proposal unacceptable.
- iv) The applicant will work with Metropolitan Police Designing Out Crime officers to ensure that the premises are appropriately safe and secure.

12.2 It is noted that residents have raised concerns about the siting of this proposed development in their area. The applicant is committed to working with the Metropolitan Police to ensure that the building achieves Secure By Design accreditation so that it is appropriately safe and secure. The applicant has outlined that this is not a 'walk-in' facility for homeless men but rather a facility that occupants will be referred into by specialist housing officers, following a process of robust risk assessment.

12.3 It must also be reiterated that there is currently an acute crisis of homelessness in Enfield and that this facility would provide much needed accommodation for up to 36 homeless men. The use of a temporary consent means that, were the homelessness crisis to abate in years to come, the building provides the flexibility for potential re-use as an office, and for future adaptation, as well as for future change of use.

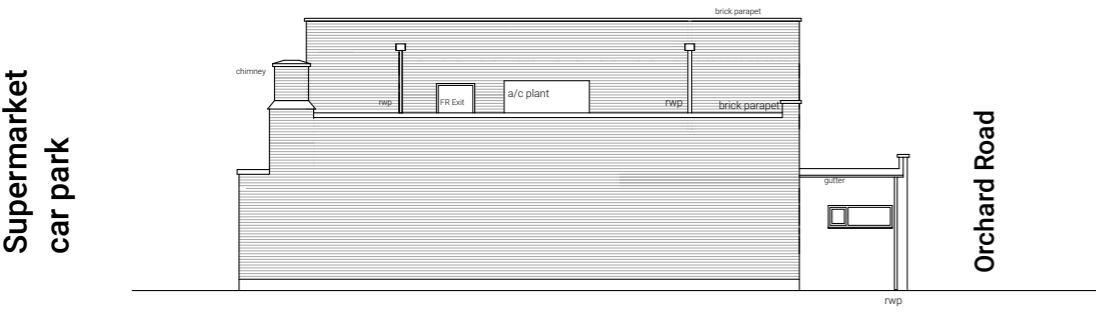


ORCHARD ROAD  
EXISTING NORTH ELEVATION



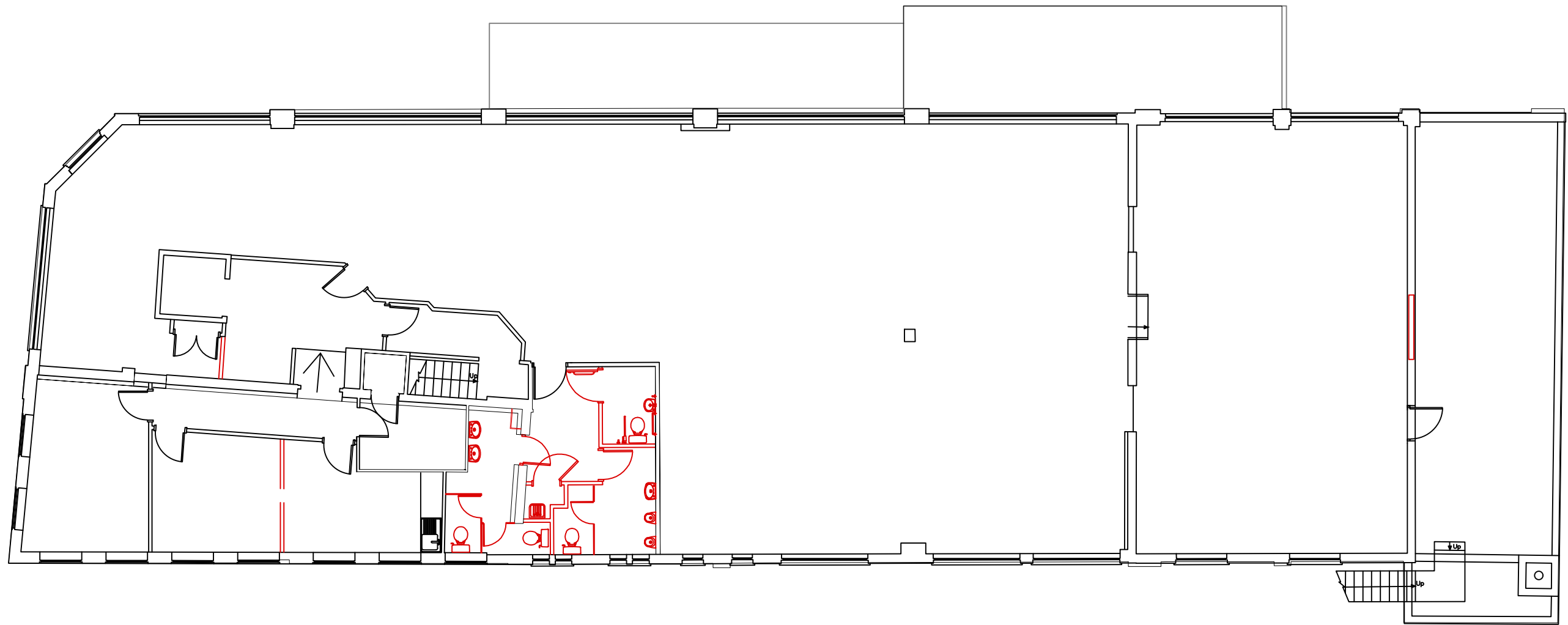
HIGH ROAD  
EXISTING WEST ELEVATION

SUPERMARKET CAR PARK  
EXISTING SOUTH ELEVATION

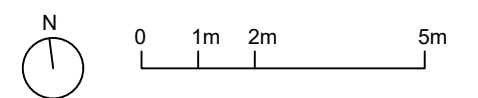


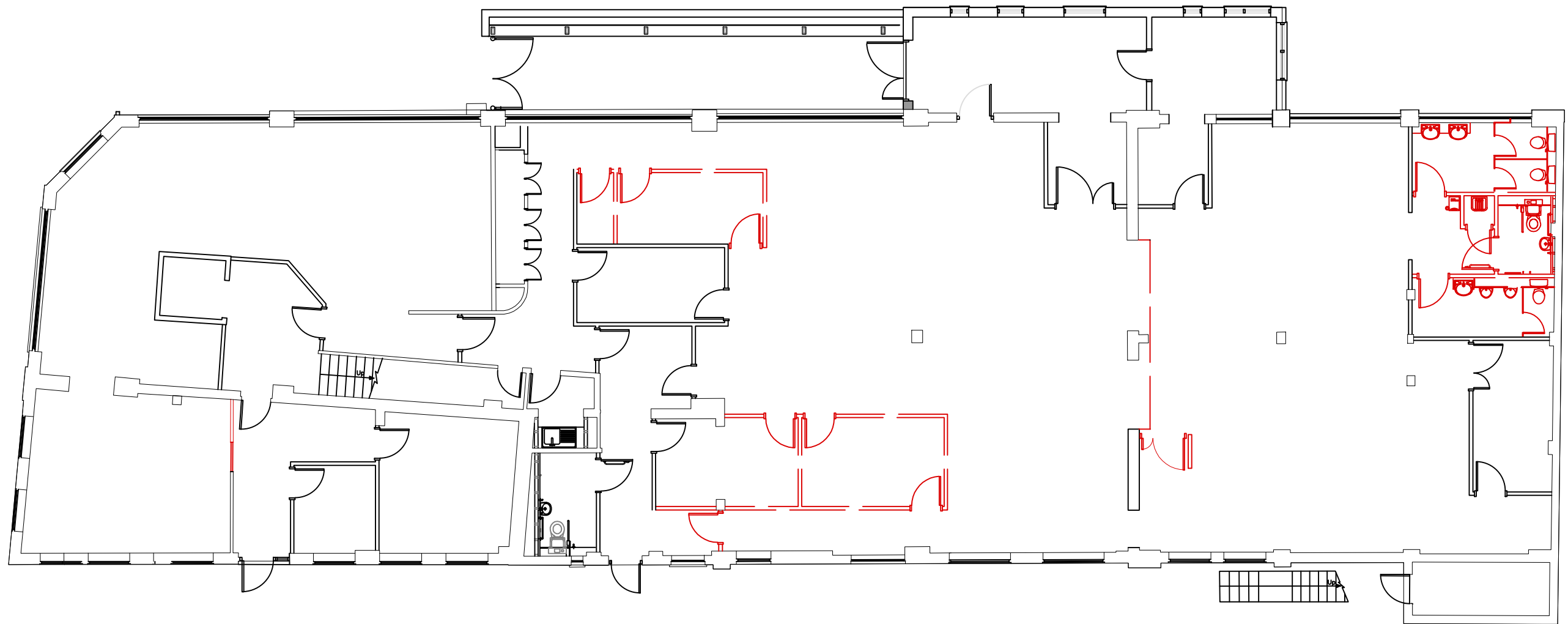
ORCHARD ROAD  
EXISTING EAST ELEVATION

John Wilkes House  
Drawing No A120  
Existing Elevations  
Scale 1:200 @ A3  
Revision -  
Issued 25.03.2025  
Issued for Planning  
Drawn by Enfield Council Architecture Team

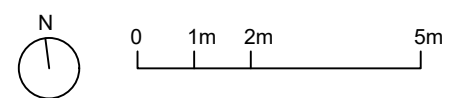


John Wilkes House  
Drawing A101  
Existing First Floor showing Demo  
Scale 1:150 @ A3  
Revision A  
Issued 25.03.2024  
Issued for Planning  
Drawn by Enfield Council Architecture Team





John Wilkes House  
Drawing No A100  
Existing Ground Floor showing Demo  
Scale 1:150 @ A3  
Revision A  
Issued 25.03.2024  
Issued for Planning  
Drawn by Enfield Council Architecture Team



# Site Photos:

For the planning application proposals by

**ENFIELD**  **Housing, Regeneration & Growth**  
*Council*

for a hostel to house the homeless at:

**John Wilkes House,**  
**79 High Street, Enfield EN3 4EN**

# Arial photos of the existing premises



View from the North East



View from the North West



View from the South West

# Site photos of the existing premises



South elevation



Former main corner entrance



West elevation



South west corner

# Site photos of the existing premises



Part south elevation - shutters raised



Part south elevation - escape stair & boiler rm. detail, shutters raised



# Site photos of the existing premises



Towards main entrance on Orchard Road



Alleyway to east to 1 Orchard Road



North elevation to Orchard Road

# Site photos of the existing premises



Grd. fl. interior north west corner



1st. fl. interior north east corner



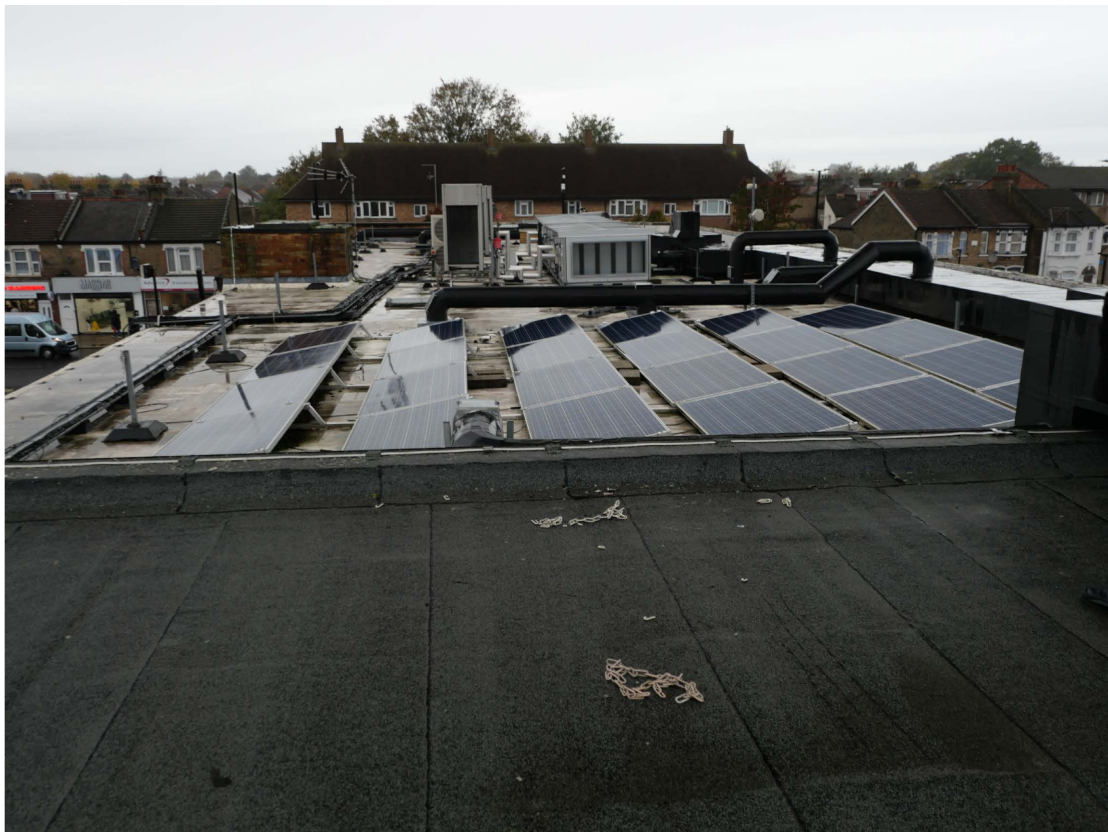
1st. fl. interior east gable with existing fire escape



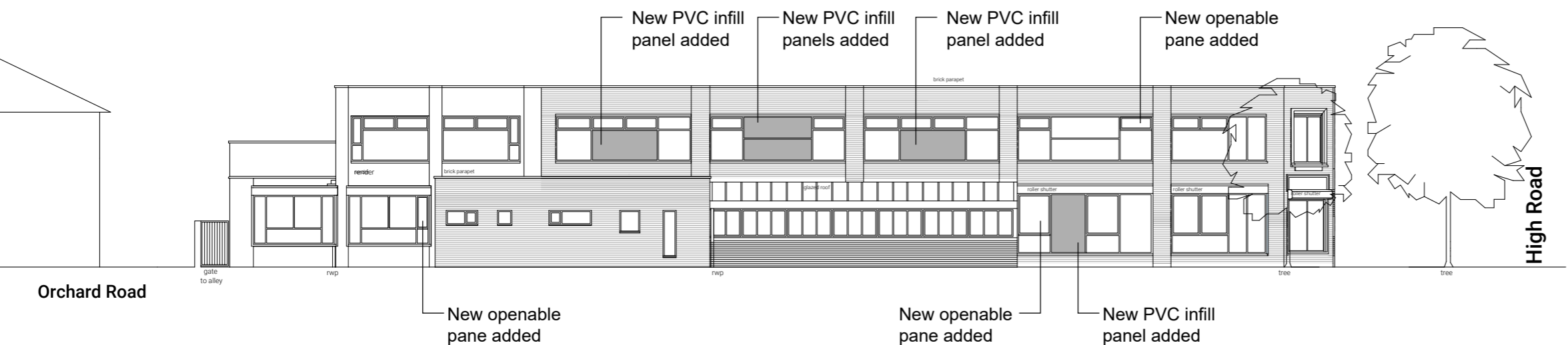
1st fl. roof terrace to east with AC plant



1st fl. roof terrace to east showing security screen on fire escape route with plant room chimney



Roof level looking west showing AC plant, PV arrays & brick upstanding tank room



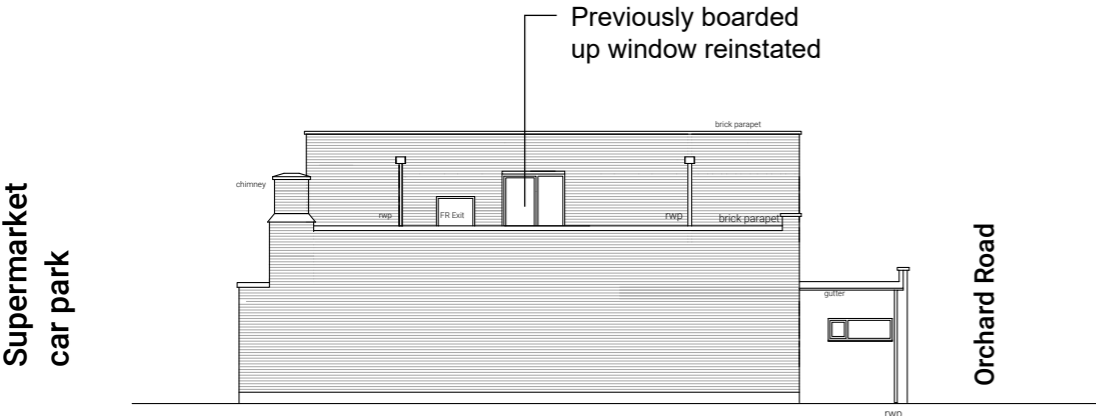
ORCHARD ROAD  
PROPOSED NORTH ELEVATION



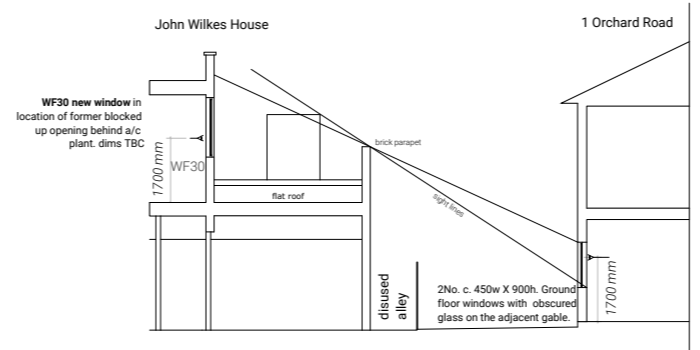
HIGH ROAD  
PROPOSED WEST ELEVATION



SUPERMARKET CAR PARK  
PROPOSED SOUTH ELEVATION



ORCHARD ROAD  
PROPOSED EAST ELEVATION

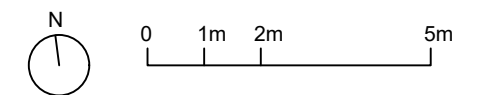


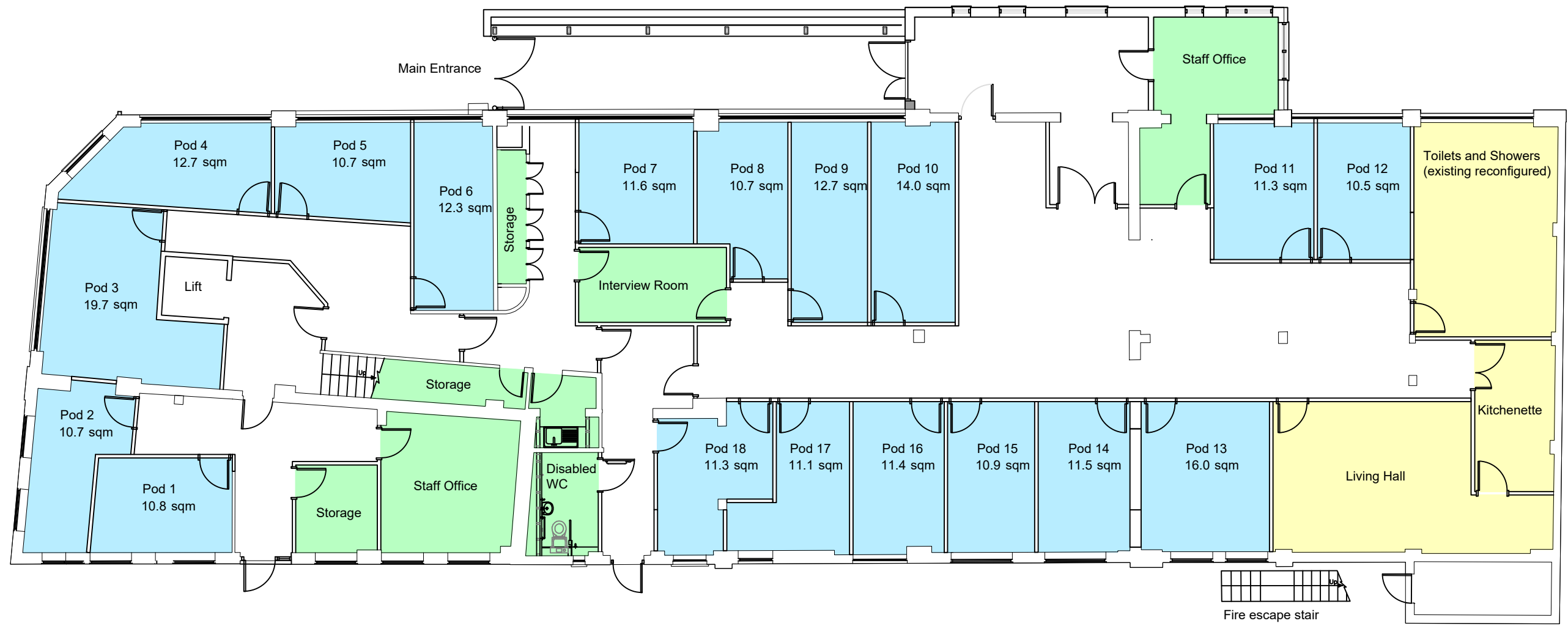
SECTION TO 1 ORCHARD ROAD

John Wilkes House  
Drawing No A400  
Proposed Elevations  
Scale 1:200 @ A3  
Revision -  
Issued 25.03.2025  
Issued for Planning  
Drawn by Enfield Council Architecture Team

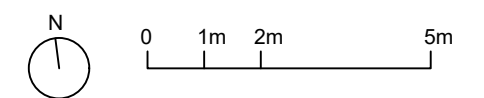


John Wilkes House  
 Drawing A201  
 Proposed First Floor  
 Scale 1:150 @ A3  
 Revision A  
 Issued 22.03.2024  
 Issued for Planning  
 Drawn by Enfield Council Architecture Team





John Wilkes House  
 Drawing No A200  
 Proposed Ground Floor  
 Scale 1:150 @ A3  
 Revision A  
 Issued 25.03.2024  
 Issued for Planning  
 Drawn by Enfield Council Architecture Team

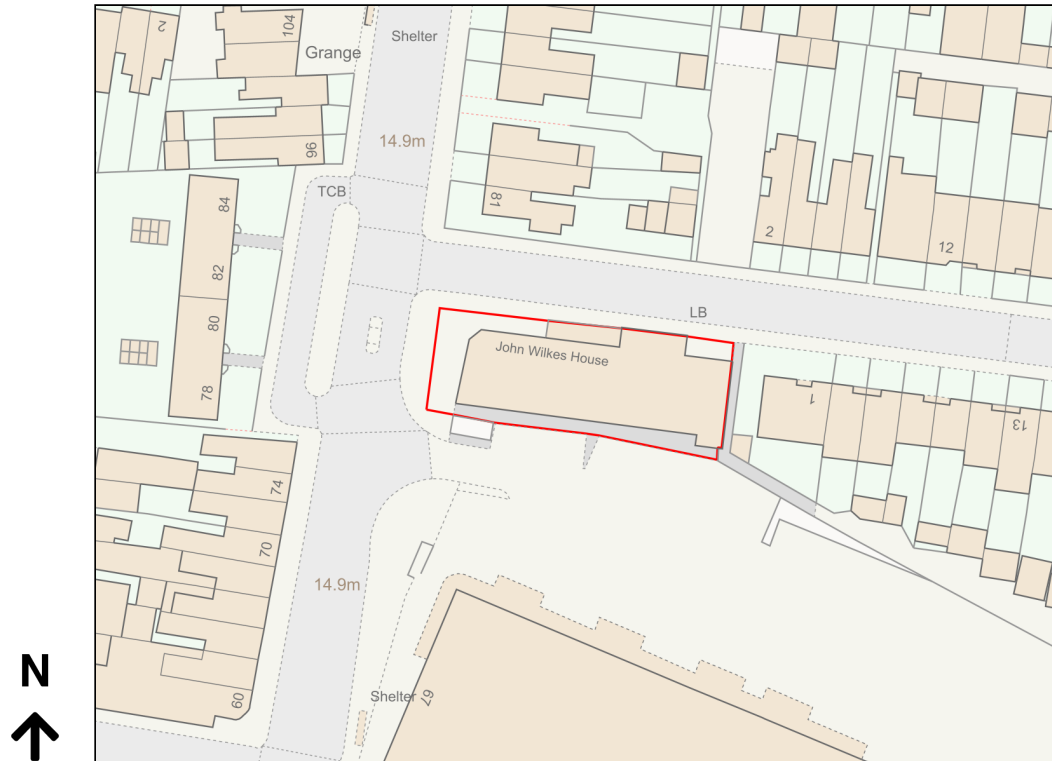


# Location Plan

Site Address: John Wilkes House, 79, High Street, Enfield, EN3 4EN

Date Produced: 03-Apr-2024

Scale: 1:1250 @A4



Planning Portal Reference: PP-12943642v1

