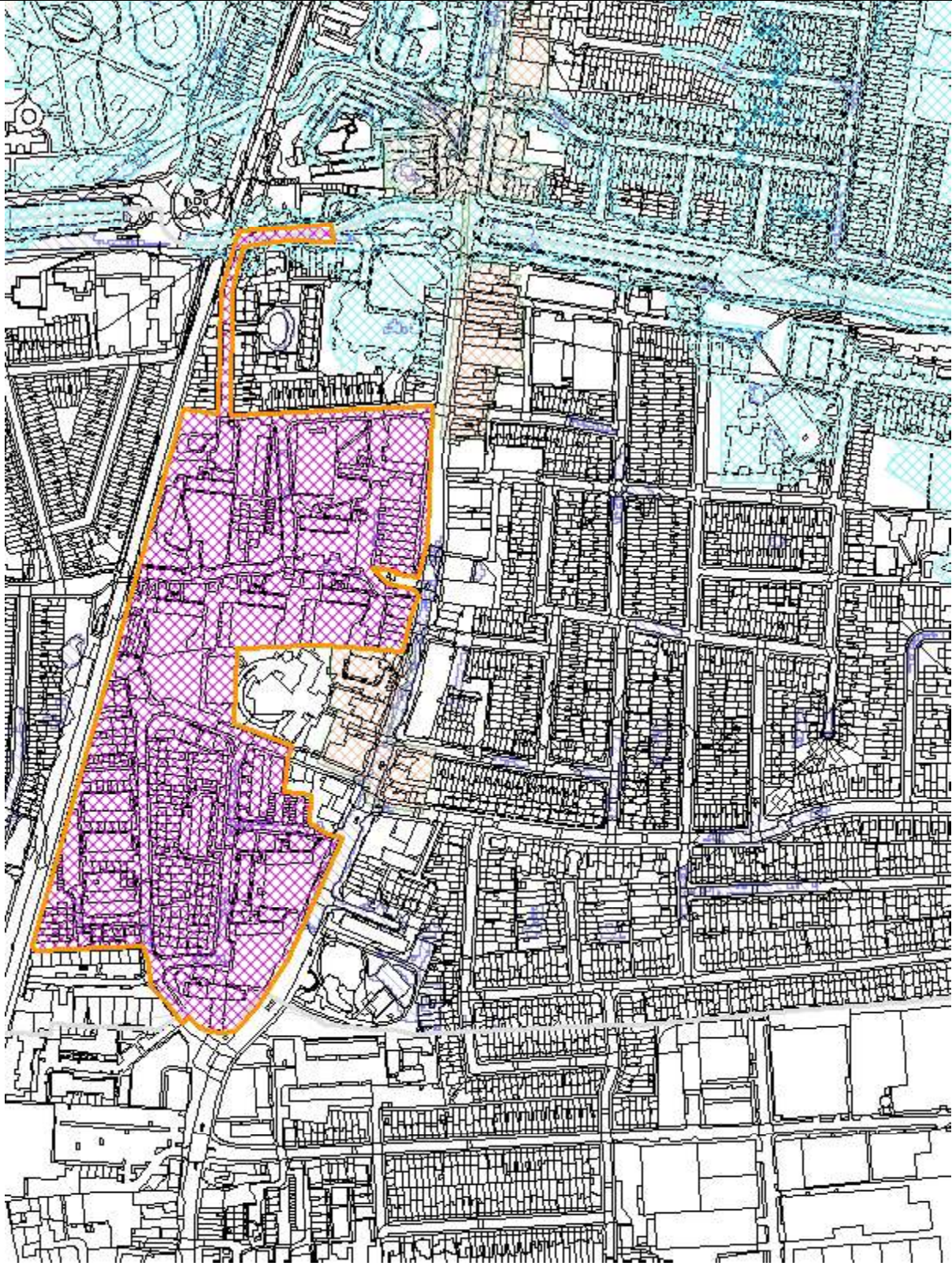


LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE	Date: 16 th July 2024	
Report of Director of Planning & Growth - Brett Leahy	Contact Officers: Joe Aggar Sharon Davidson	Category: Major
Ward: Upper Edmonton	Councillor Request: No	
LOCATION: Joyce and Snells Estate, N18		
APPLICATION NUMBER: 22/03346/OUT		
<p>PROPOSAL: Hybrid planning application (part detailed / part outline) for the phased demolition of all existing buildings and structures, site preparation works and the comprehensive residential-led mixed use redevelopment of the Joyce Avenue and Snell's Park Estates comprising:</p> <p>Detailed planning application for Phases 0-3 comprising demolition of 12no. existing residential blocks and associated structures and Boundary Hall and construction of residential and mixed-use buildings providing ground floor flexible commercial floorspace (Use Class E(a, b, c and e)) and community floorspace (Use Class F2(b)), residential dwellings (Use Class C3) along with associated road layout, means of access including new pedestrian crossing over Sterling Way, highways works including alterations to junction of College Close and Sterling Way, car and cycle parking, hard and soft landscaping, amenity space, public, communal and private realm, ancillary plant and structures including new substation and associated works.</p> <p>Outline planning application (with all matters reserved) for Phases 4-10 including the demolition of all remaining buildings and structures and the construction of buildings for residential dwellings (Use Class C3), flexible commercial floorspace (Use Class E) including allowance for a drinking establishment (Sui Generis), civic and community floorspace and facilities including temporary re-provision of Boundary Hall (Use Classes F1 and F2) with associated road layout, means of access including new pedestrian walkway connecting to existing bridge to Bridport Road, highways works, car and cycle parking, hard and soft landscaping including improvements to the boundary of St John and St James Church of England Primary School, amenity space, public, communal and private realm, ancillary plant and structures and other associated works. (An Environmental Statement, including a non-technical summary, also accompanies the planning application in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)).</p>		

Applicant Name & Address: London Borough of Enfield Housing	Agent Name & Address: HTA, 75 Wallis Road London, E9 5LN
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RECOMMENDATION:

1. That subject to (i) a Shadow S106 Agreement being agreed to secure the matters covered in this report and to be appended to the decision notice and (ii) a Memorandum of Understanding being entered into to secure the obligations contained in the Shadow Section 106 Agreement and (iii) the Stage 2 Referral to the Mayor of London and no objection being received, that delegated authority be given to the Head of Development Management to grant planning permission subject to conditions.
2. That delegated authority be given to the Head of Development Management to finalise the conditions and the Shadow Section 106 Agreement to cover the matters identified in the report.



1. Note for Members

- 1.1 This planning application is categorised as a 'Major' planning application as the Council is the landowner and Applicant. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

2. Recommendation

- 2.1. That subject to (i) a Shadow S106 Agreement being agreed to secure the matters covered in this report and to be appended to the decision notice and (ii) a Memorandum of Understanding being entered into to secure the obligations contained in the Shadow Section 106 Agreement and (iii) the Stage 2 Referral to the Mayor of London and no objection being received, that delegated authority be given to the Head of Development Management to grant planning permission subject to conditions.
- 2.2. That delegated authority be given to the Head of Development Management to finalise the conditions and the Shadow Section 106 Agreement to cover the matters identified in the report.

Conditions Relating to All Development

1. Conditions Phases 0-3 (Full Element)

- Time Limit (3 years)
- Development in accordance with Approved Plans
- Details of Materials
- Details of Levels
- Quantum of Development
- Housing Mix (compliance)
- Details of Phasing Plan
- Reserve Matters Application requiring replacement and operation of Boundary Hall
- Permitted uses: Non-Residential Floorspace (compliance)
- Hours of Use: Non-residential (compliance)
- Details of the Energy Centre and completion prior to Phase 0
- Energy Strategy (compliance)
- Details of the Temporary Bridge and completion prior to the occupation of Phase 0
- Heritage Plan and recording of non-designated heritage asset
- Childrens Play Area in accordance with phasing and details
- Details of temporary playground and delivered before occupation of Block A
- Details of access to rooftops of Blocks N and K
- Details of Wind mitigation Blocks N and K
- Biodiversity Net Gain Assessment (compliance)
- Fire Statement (compliance)

2. Conditions Phases 4-10 (Outline Element)

- Time Limit
- Development in accordance with Approved Plans
- Reserved Matters Scope
- Submission of Reserved Matters
- Details Phasing Plans and delivery of infrastructure prior to relevant phase
- Restriction of non-residential floorspace
- Restriction of café/sui generis floorspace
- Provision of Childrens nursery prior to occupation of Phase 4 and maximum occupancy
- Details of Childrens Nursery external play space
- Delivery and details of the access to the bridge prior to occupation of Phase 4
- Details of school boundary
- Completion of commercial units prior to occupation of residential units
- Details of commercial shopfronts and signage
- BNG Assessment
- Wind Mitigation
- Fire Statement Addendum
- Overheating Assessment
- Prior to the demolition of Phase 6, details of the treatment to the flank elevation to White Horse Public House
- Details of MUGA and operation prior to occupation of Phase 4
- Basement Impact Assessment
- Details of Community space for use by Metropolitan police

3. Hybrid (Full and Outline)

- (Grampian Condition) Signing of s106 by any Third Party
- Compliance with EIA
- Compliance with EIA mitigation
- Quantum of Development and min. and max.
- Maximum number of residential units
- Piling Method Statement (sewer)
- Piling Method Statement (water mains)
- Foul Water Network Upgrades
- Surface Water Network Upgrades
- All Water Network Upgrades
- Archaeology Written Scheme of Investigation
- Archaeological Field Work
- Sound Attenuation
- Acoustic report
- All Non-Road Mobile Machinery (NRMM)
- Construction Environmental Management Plan
- Site Waste Management Plan
- Contaminated Land
- Contamination (Verification Report)
- Contamination (not previously identified)
- Unexploded Ordnance (UXO)
- Fire evacuation lifts
- Details of Refuse and Recycling
- Delivery and Servicing Plan
- Parking Design and Management Plan, including car club bays
- Wheelchair parking bays min. level

- Digital connectivity
- Details of public realm fronting Fore Street
- Boundary Treatments
- Accessible and Adaptable Dwellings
- Wheelchair Adaptable dwellings
- Water consumption
- Details of College Close junction
- Parking spaces to be provided prior to occupation of residential units
- Cycle Parking Provision
- Electric Vehicle Charging
- Secure by Design
- Removal of permitted development rights for conversion to residential
- Restriction of permitted development – residential
- Telecommunication apparatus
- No plant and equipment fixed to external facades
- Updated Overheating and Cooling – Residential
- Updated Energy Statement
- Details of Brown/Green Roofs
- Details of Solar PVs
- Details of Drainage Strategy
- Sustainable Drainage Verification
- Ground Water Monitoring
- Whole Lifecycle Carbon Assessment
- Circular Economy Statement
- BREEAM Assessment, non-residential
- Biodiversity Net Gain Assessment
- Tree Method Statement and Tree Retention Plan
- Details of Temporary Landscaping
- Landscaping details, including play space allotments and green roofs
- Landscape and Ecological Management Plan
- First Planting Season or the substantial completion of the development
- Details of Lighting Strategy
- Details of shopfront signage, signage zones and wayfinding
- No works in nesting season
- Updated Bat survey
- Details of Biodiversity Enhancements
- Relocation of Gilpin's Bell Structure
- Details of fixed plant

3. Executive Summary

- 3.1. The London Borough of Enfield (LBE) Housing Team is seeking to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This includes delivering several housing renewal and estate regeneration schemes across the Borough.
- 3.2. Joyce and Snells Estate has been identified as a key site forming part of LBE's development programme, with a greater number of high-quality homes, including a significant uplift in affordable housing. Through extensive pre-application discussions with the Local Planning Authority (LPA), inclusive of reviews of the development proposal with the Enfield Place and Design Quality Panel, the applicant has developed a comprehensive masterplan for the site, which offers an opportunity to increase the number of homes, including affordable homes, whilst better integrating the site into the surrounding community and improving the sense of neighbourhood safety.
- 3.3. This hybrid application, is seeking Full and Outline planning permission for a phased, comprehensive residential-led mixed use redevelopment comprising up to 2,028 residential homes (Use Class C3), a new community centre (Use Class F2), a new nursery (F2), an energy centre and flexible commercial floorspace (Use Class E, Sui Generis) in buildings of up to 26-storeys, together with new publicly accessible parks, landscaping, public realm, pedestrian and cycle connections and highways/access works.
- 3.4. The development offers up to 1,013 affordable homes (additional 579 net affordable homes). 53% of the gross number of new housing will be affordable (based on habitable rooms). 49% of the homes would be affordable based on units. The affordable homes will be appropriately split across Social Rent, Shared Ownership and Shared Equity tenures.
- 3.5. A good dwelling mix and range of housing tenures is provided to meet the needs of those residents who wish to stay on the estate. The proposed level of family-housing (386 units overall) is less than Local Plan policy calls for. However, this has been shaped by the characteristics of the scheme. As an estate regeneration project, decant and rehousing requirements have taken priority and therefore this represents the maximum level of family housing based on the overall viability of the scheme and provides a valuable net uplift (262 homes, 3bed + units) in family homes above that which currently exist on the site.
- 3.6. The proposed development would provide community uses, flexible commercial and purpose-built workspaces spaces. The provision of new social infrastructure will provide improved facilities and capacity for proposed residents. Furthermore, the proposed new commercial floorspace would support an overall increase in mixed employment and have no adverse impact on the vitality and vibrancy of the Angel Edmonton Designated Centre.
- 3.7. The design and layout of the proposed masterplan is supported. The scheme is based on robust urban design principles and objectives in terms of creating a highly legible and permeable layout of streets and public squares centred on a strong landscape-led vision for the site. Overall, the architectural design and detailing is of a high standard.

- 3.8. The proposals include tall buildings. The proposed heights would not accord with the Council's tall buildings policy (both current and emerging policies). However, the visual, functional, environmental, and cumulative impacts of the tall buildings are considered to be, on balance, acceptable, in this instance, taking the Development Plan as a whole, particularly in the context of the Council's shortfall in housing land supply (the 'tilted balance').
- 3.9. The Joyce and Snells Estate comprises a non-designated heritage asset (NDHA) and also adjoins the Fore Street Conservation Area and North Tottenham Conservation Area and nearby listed buildings. The proposal would result in the total loss in the significance of the estate (NDHA), given it is proposed for demolition. The identified harm, notably less than substantial harm, to the non-designated and designated heritage assets has been balanced against the benefits of the development, noting that considerable importance and weight should be attached to this harm, in reaching a conclusion as to the acceptability of the proposals.
- 3.10. The application proposes new publicly accessible parks, landscaping, public realm, pedestrian and cycle connections, highways/access works. The proposal includes a high quality and well-considered landscape strategy. This would provide significant qualitative improvements to the open space as well as a small uplift in the overall amount of open space on site. The proposal includes a large increase in tree coverage on the site. Subject to recommended conditions and s106 obligations, a good level and quality of play space is proposed, with offsite enhancements, to Florence Hayes Recreation Ground.
- 3.11. All proposed homes would meet relevant residential space standards (floorspace, layout, floor to ceiling heights). Some new residential units would not achieve recommended internal daylight and sunlight levels to habitable rooms. This is taking into consideration the higher density nature of the scheme and is offset by the majority of units being dual aspect, together with acceptable orientation, layout of proposed homes and appropriate private amenity space. The provision of private and communal space is also considered acceptable. Overall, the quality of residential accommodation proposed is considered acceptable.
- 3.12. The proposed development is considered to have been designed to minimise impacts on residential amenity. Nonetheless the proposals would result in some adverse impacts in terms of loss of daylight, sunlight and sun-on-ground to neighbouring residential properties. Consideration should be given to the sites urban context in considering relative reductions in daylight and sunlight to neighbouring properties, as well as the existing openness to parts of the site. The identified adverse impacts to daylight and sunlight to neighbouring properties is considered to be outweighed by the overall benefits of the proposal, set out in the report.
- 3.13. The application proposes a new energy centre in the detailed phases for connection to the decentralised energy network, several energy efficiency measures, optimisation of the design to reduce carbon emissions and on-site renewable energy. Moreover, inclusive design measures have been incorporated into the scheme as well as landscape features and biodiversity measures, in accordance with planning policy.
- 3.14. Overall, the residential-led development seeks to extend the provision of housing by making more efficient use of land and providing a high quality of

homes. The estate redevelopment will allow for the provision of 2,028 new homes overall, new landscaping and public realm, to make better use of the site. The proposed scheme is a sustainable form of development on brownfield land, in a sustainable location. The primary public benefits of the scheme can be summarised as follows:

- Optimising the site and making effective use of a brownfield site
- A significant contribution of 1,233 additional homes to the Borough's housing target
- Delivery of 1,013 affordable homes, comprising 53% of the total gross housing offer (habitable rooms)
- Single decant and right of return for existing residents
- Delivery of 386 family-sized homes
- New civic hub to Fore Street, community space and nursery
- New accommodation for commercial units and maker spaces
- Provision of two new parks, pocket parks, landscaping and public realm
- New MUGA on site and upgrade to existing off-site MUGA
- New signalised pedestrian crossing over the A406
- Improving accessibility to Silver Street Station and Pymmes Park
- Strategic cycle and pedestrian connections along green routes north/south and east/west routes, including a ramp to the bridge over the railway
- Functional outdoor amenity space, play areas and private amenity spaces
- Achieving reduced carbon emissions through connection to the Enfield FDistrict Heat Network and carbon offset contributions
- Integration of on-site sustainable urban drainage measures across the site
- 72.21% on-site biodiversity enhancements across the masterplan and 726 new trees
- Improved quality of place and safer/more secure environment
- S106 contributions towards improvements and mitigation in the vicinity of the site including public realm/heritage, health, education, transport, carbon offsetting and open space/play provision contributions.

3.15. The report details all relevant national, regional, and local policy implications of the scheme, including supplementary planning guidance. Overall, the hybrid planning application is considered in accordance with adopted planning policy and is recommended for approval.

3.16. The application will require a shadow section 106 agreement with suitable planning obligations to be agreed including financial contributions, as set out in the report, to mitigate the impacts of the development; thus, overall, together with the imposition of appropriate planning conditions the planning application is considered acceptable and in accordance with the Development Plan, when read as a whole.

4. Site and Surroundings

- 4.1. The site is Joyce Avenue and Snell's Park Estate (referred to as 'the Site') (known as 'Joyce and Snell's Estate'). The estate was constructed between the late 1950s and early 1960s. The Site is in the Upper Edmonton ward and is approximately 10.11 hectares in size.



Key

- | | |
|---------------------------------------|-------------------------------|
| 1 Joyce Avenue Estate | A College Close |
| 2 Snell's Park Estate | B Fore Street |
| 3 St John + St James Primary School | C Bridport Road |
| 4 Silver Street railway station | D Joyce Avenue |
| 5 Pymmes Park | E Colyton Way |
| 6 Railway bridge | F Grove Street |
| 7 North Middlesex University Hospital | G Claremont Street |
| 8 Florence Hayes recreational ground | H Snell's Park |
| 9 Langhedge Lane industrial site | J Langhedge Close |
| 10 Brook House Primary School | K Langhedge Lane |
| | L Tottenham High Road |
| | — Hybrid application boundary |

- 4.2. There are 795 existing residential dwellings (Use Class C3) on the site, of which, 434 are affordable tenure (390 social rented homes and 44 homes managed by various housing associations). 361 homes on the estate are in private ownership. The residential buildings on site range from 2 to 15-storeys in height. The existing housing varies in style and height, including eight, 9-storey slab blocks and one taller 15-storey slab block, two-storey terraced homes and blocks of flats.
- 4.3. There are a range of retail, civic, community, employment, and other town centre uses (Use Classes E, F, and Sui Generis) within the Site, primarily located along Fore Street. The existing units consist of 2-3 storey buildings with residential or storage/office space on the upper floors. The Angel Edmonton District Centre also includes the adjacent Lidl to the north and commercial buildings along Sterling Way, which are outside of the site boundary.
- 4.4. A section of land in the centre of the Site is excluded from the site boundary, albeit the school boundary is included within the application site. This comprises St John and St James Primary School, Edmonton County Court and St James's Court. The petrol station and Edmonton Temple adjoin but are also not within the site boundary. Similarly, the White Horse Public House on Fore Street directly abuts the site boundary.
- 4.5. The Site includes Boundary Hall and the Angel Yard, in the southern part of the estate, which currently provides community/civic space and employment workspace respectively through planning permission 21/03375/RE4. The permission is for a meanwhile use, lasting 5 years. The works have been completed for the temporary redevelopment and use of garages and a laundry yard to the south of Grove Street, providing 600sqm of affordable office and workplace (artists/craftspeople, and other small businesses) along with a café for start-ups.
- 4.6. The Site is bounded by Fore Street, which is a busy commercial thoroughfare running north to south. The north of the site is bounded by two storey terraced dwellings along College Gardens and College Close, and beyond is the A406 North Circular Road and Silver Street Overground Station. To the west is an overland railway line. To the south, the site is bound by Langhedge Lane and the associated industrial estate and Brook House Primary School immediately beyond this, where the site adjoins the borough boundary with Haringey.
- 4.7. The site falls within a Public Transport Accessibility Level (PTAL) of 3 to 5, on a scale from 0-6b, with 6b representing the highest level of public transport access. The nearest station is Silver Street, served by the Overground and to the north side of Sterling Way. White Hart Lane Overground Station is also located to the south. The Overground viaduct is adjacent to the western edge of the Site. There are bus stops located on Fore Street, Sterling Way and Bridport Road, providing access to the 149, 259, 279, 249, 34, 102, 144, 444 and the 491 service. Cycleway 1 terminates around 700 metres to the south.
- 4.8. The proposed development site straddles part of the A406 North Circular Road known locally as Sterling Way and Angel Road which form part of the Transport for London Road Network (TLRN). Fore Street forms part of the Strategic Road Network (SRN) and is managed by LB Enfield. To the west there is a footbridge over the railway line which provides access to Bridport Road.

- 4.9. The Fore Street Conservation Area is adjacent to the Site and covers several buildings located on the eastern side of Fore Street and to the north of Sterling Way and the A406 North Circular. The Fore Street Conservation Area also covers Edmonton County Court and several buildings on both sides of Fore Street. The North Tottenham Conservation Area is to the south and falls within London Borough of Haringey.
- 4.10. The site itself forms a non-designated heritage asset. The site does not include any statutorily listed buildings. The closest listed buildings are Grade II listed 859-863 and 867-869 High Road in Haringey which are to the south; and the Grade II listed Angel Place (183-191 Fore Street) to the north, within Enfield.
- 4.11. In terms of the wider context, North Middlesex University Hospital and predominantly two-storey residential streets are to the west; the A406 North Circular and Edmonton Town Centre are to north. Industrial buildings are to the south / south-west which fall within designated Locally Significant Industrial Site (LSIS). To the south is the borough boundary with the London Borough of Haringey. The Cannon Road development is to the south of the Site and comprises residential blocks ranging in height from 6 to 10, together with a 22-storey tower (Brook House) and a primary school in Haringey.
- 4.12. Further along High Road, to the south, are regeneration sites, including the High Road West Masterplan. This includes proposals for the regeneration of the Love Lane Estate as well as the new Tottenham Hotspur Stadium. Further to the east, within Enfield, is Meridian Water Regeneration Area.

5. Proposal

- 5.1 This is a 'Hybrid' planning application (part full, part outline) for the redevelopment of Joyce and Snells Estate. The Proposed Development is intended to be brought forward in 11 Phases (0-10).
- 5.2 Phases 0-3 are covered in the Detailed Element of the Hybrid Planning Application. The detailed phases 0-3 are in 'Full' (with all details submitted for approval at this stage).
- 5.3 The Detailed Phases seek permission for 575 residential units. 526 of the units (91%) would be affordable homes. In addition, 455sqm of commercial floor space (in Block N) and 103sqm of community floorspace (in Block D) are proposed.
- 5.4 Phases 4-10 are within the Outline Element with all matters reserved for subsequent Reserved Matters approval.
- 5.5 The Outline Phases seek permission for up to 138,000sqm (GIA) residential floorspace which could deliver 1,453 homes. The tenure mix would comprise 66% private and 34% affordable (by unit). 487 affordable homes are proposed within the Outline Element. In addition, up to 2,632sqm of community use, up to 250sqm of nursery use, 2,526sqm of commercial floorspace and 793sqm of employment workspace and a minimum of 23,918sqm of landscaped spaces are proposed.
- 5.6 The elements where 'Full' and 'Outline' permission are sought, is summarised below:

Detailed Element (Phases 0-3)

- 5.7 Full details are submitted for approval in relation to the Detailed Element, (also referred to as Phases 0-3) of the Proposed Development. This comprises the development of Blocks A, D, K, N and T (highlighted in yellow).
- 5.8 In addition, new open space and public realm, access and highways works, car and cycle parking are proposed. An Energy Centre serving the wider development is also proposed. The Detailed Element also includes a signalised crossing on Sterling Way for improved access to Silver Street station and to Pymmes Park, to the north of site.



Detailed Blocks (Full Element) – Highlighted in yellow

Block A, Energy Centre and Temporary Footbridge (Phase 0)

- 5.9 Block A is the first block to come forward as part of the Proposed Development in Phase 0. Block A comprises a part 5-, part 10-storey building and is laid out as a series of maisonettes with flats above, adjacent to a taller block of flats.
- 5.10 Block A is 100% residential, providing a total of 50 homes comprised of 9no. one-bed flats, 34no. two bed-flats, 4 no. three-bed flats and 3no. five-bed flats. 11 (22%) of these units are to be shared equity, 11 are to be shared ownership and 10 (20%) replacement social rent homes and 18 (36%) social rent uplift homes.
- 5.11 The existing playground to the north-west of the Site is to be temporarily relocated to land immediately to the west of the St John and St James CofE Primary School. This is to allow early enabling works, to facilitate the development of Block A within Phase 0, until such time that the first part of the new public park, between Blocks N and K is completed at the end of Phase 3.
- 5.12 The existing garages adjacent to the railway line will be demolished to deliver a new single storey substation, approximately 145sqm to facilitate the heat district network, supplying energy to the site. Improvements are proposed to the existing bridge footpath. The steps to the existing ramp will be replaced, with new steps north of the substation. In the later phases (Phase 4), the temporary ramp structure is proposed to be replaced as part of wider public realm proposals within that phase.

Block D and Pocket Park (Phase 1)

- 5.13 Located in the north-west of the Site immediately to the south of Block A, Block D is the second block to come forward as part of Phase 1 of the Proposed Development. Block D is formed of three built elements which are set around an internal courtyard above a podium and is a part 8-, part 13-, and part 26-storey building.
- 5.14 Block D is a predominantly residential building providing 220 homes comprised of 54no. one-bed flats, 84no. two-bed flats, 4no. two-bed maisonettes, 64no. three-bed flats, 12no. three-bed maisonettes and 2no. four-bed maisonettes. 41 (19%) of these units are to be shared equity, 47 (21%) are shared ownership, 47 (21%) are to be replacement social rent homes and 85 (39%) are to be social rent uplift homes, in addition to those replaced. This block also includes 103sqm (GIA) of new community floorspace at ground floor level.
- 5.15 A community garden (pocket park) is proposed to be located between Blocks A and D, which will provide amenity space for the adjacent blocks. The space is divided into three areas dedicated to 0-4 doorstep play, social space and community growing garden for residents, with defensible planting around the periphery (to provide privacy for ground floor homes and to protect against the adjacent railway line).

Block N, Gas Governor and Public Realm to Fore Street (Phase 2)

- 5.16 Block N is a courtyard block located to the south-east of the Site and is the third block proposed to come forward within Phase 2. It is a part 5-, part 6-, part 7-, part 8-, and part 10-storey building with retail on the ground floor to Fore Street.

- 5.17 Block N provides 148 homes and commercial uses at ground floor level fronting Fore Street. The block is comprised of 74no. one-bed flats, 34no. two-bed flats, 32no. three-bed flats, 8no. three-bed maisonettes. 14 (9%) of these units are to be shared equity, 49 (33%) are for market sale, 57 (39%) are replacement social rent homes and 28 (19%) are social rent uplift homes.
- 5.18 455sqm (GIA) of commercial / retail floorspace is provided at the ground floor fronting onto Fore Street (Use Class E). A new pedestrianised/public realm area is proposed between the commercial units of Block N and Fore Street. This would comprise a new plaza space with seating and raised planting area.
- 5.19 The existing Boundary Hall (329 sqm GIA) is to be demolished in Phase 2 of the Detailed Element to facilitate the construction of Block N. A temporary community facility is to be provided in the Outline Element, located to the north of Block N, adjacent to Angel Yard, until the permanent re-provision of Boundary Hall in Block G in the later phases of the Outline Element. The detailed design of the temporary facility would be addressed through an early RMA, the timing would be controlled by a condition. The use of the temporary space is to be the same as the current Boundary Hall (Use Class F2) and is to be 362 sqm (GIA).
- 5.20 A permanent Gas Governor and associated enclosure is proposed within the public realm on the southern side of the access road along the south of Block N to ensure that existing surrounding homes, continue to receive a gas supply. It will be built as part of the Detailed Element and retained thereafter. The Gas Governor will be contained within metal housing, measuring 2.7m wide by 6m in length to provide a total internal area of 16.2 sqm. It will be 2.15m in height and be enclosed by 2.25m high frame with climbing plants on the outside, which will be along the perimeter of the metal housing maintaining a 3m clearance zone in all directions.

Block K and T and Public Park (Phase 3)

- 5.21 Block K is a perimeter block and is the fourth block proposed to come forward within Phase 3 of the Proposed Development. The block is part 5 -, part 8-, part 10 storeys.
- 5.22 Block K is residential providing 138 homes comprised of 56no. one-bed flats, 31no. two-bed flats, 38no. three-bed flats, 9no. three-bed maisonettes and 4no. four-bed maisonettes. 9 of these units are to be shared equity homes, 5 are to be replacement social rent homes and 124 (90%) are to be social rent uplift homes.
- 5.23 The southern part of the new park (the Meadows, annotated above) will be delivered upon completion of Block K, providing around 3,560sqm of open space (0.3ha). It will provide around 1,950sqm of formally equipped playable space for older children aged 5-11 (0.2ha), with approximately 250sqm attributed to doorstep play for younger children from 0-4 (0.03ha).
- 5.24 Temporary landscape spaces are to be provided during Phase 3, between Blocks K and N, following construction stage to create informal play, amenity lawn and wildflower meadows with ecological interventions until adjacent blocks come forward for development and enable the delivery of the north section of the Meadows Park.

5.25 Block T is the fifth block to come forward and is proposed to be delivered as part of Phase 3 alongside Block K. Block T is residential and comprises of ten 3-storey houses and a 5-storey block of flats.

5.26 In total, it provides 19 homes comprised of 8no. two-bed flats, 1no. three-bed flat, 4no. three-bed houses, 5no. four-bed houses and 1no. five-bed house. 7 (37%) of these units are to be replacement social homes. The remaining 12 (63%) being social rent uplift homes.

Summary Tables of Detailed Phases (0-3)

Housing by Block – Detailed Element (Units)						
Block	Shared Equity	Social Rent (Replacement)	Social Rent (Uplift)	Shared Ownership	Market Sale	Total
Block A	11	10	18	11	0	50
Block D	41	47	85	47	0	220
Block N	14	57	28	0	49	148
Block K	9	5	124	0	0	138
Block T	0	7	12	0	0	19
Total	75	126	267	58	49	575
Total in Detailed Phases (0-3) 575 units						

Table: Proposed Tenure Mix – Detailed Phases

Block	Non-Residential (Sqm GIA)	
	Commercial/Retail	Community
Block A	0	0
Block D	0	103
Block N	455	0
Block K	0	0
Block T	0	0
Total	455	103
Total: 558sqm		

Table: Proposed commercial floorspace – Detailed Phases

Housing Tenure and Mix - Detailed Element (Units)							
Tenure	1 bed	2 bed	3 bed	4 bed	5 bed	Total	%
Social Rent	133	113	134	11	2	393	68%
Shared Equity	16	29	28	0	2	75	13%
Shared Ownership	19	39	0	0	0	58	10%
Private	25	14	10	0	0	49	9%
Total	193	195	172	11	1	575	100%
%	34%	34%	30%	2%	0%	100%	
Total in Detailed Phases (0-3) 575 units							

Table: Proposed Tenure Mix – Detailed Phases

Outline Proposals – Phases 4-10

- 5.27 The outline element, with All Matters Reserved, has been submitted to establish the principle of the proposed development and allow the necessary flexibility for the development of detailed design as part of a phased delivery across the application site. The outline element comprises 14 development plots.



Outline Blocks – Highlighted in yellow

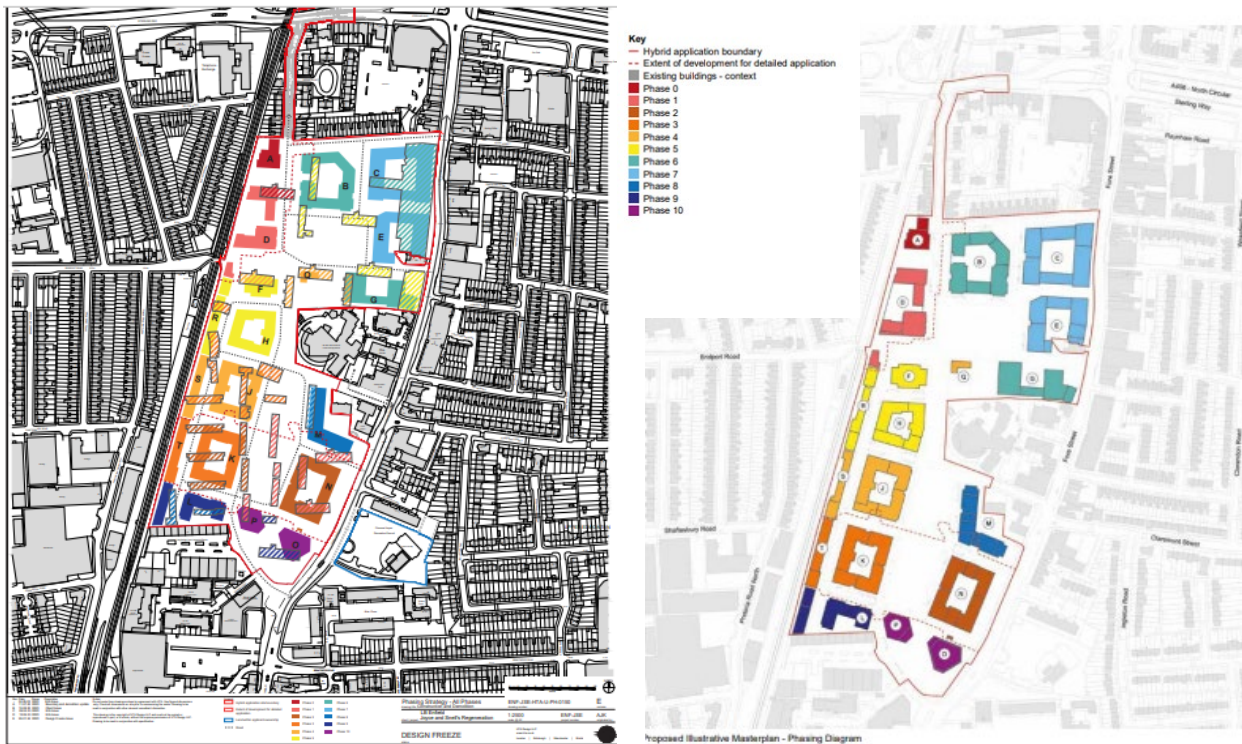


Image: Indicative Phasing Plan (Phases 0-10)

- 5.28 An indicative phasing plan has been submitted with the application. This shows the proposed build sequence throughout the estate redevelopment. Given the length of the proposed development (approximately 23 years), it is acknowledged there is the possibility this may change over time.
- 5.29 A set of parameter plans have been submitted. These seek to establish the key development principles associated with the outline elements of the proposed development including development plots, access, open space and public realm which set the masterplan structure, site levels, building heights and predominant distribution of different land uses at ground and upper floor levels. The parameter plans show the maximum potential scale of development.
- 5.30 The Development Specification, identifies the quantum and type of development to be delivered in the outline, alongside the parameter plans:

Land Use	Class	Minium Sqm	Maximum Sqm
Residential	C3	-	138,000 1,453 units
Basement	C3 (ancillary)	-	1,606
Retail/Commercial (Drinking Establishment)	E (Sui Generis)	2,273 (360)	2,526 (400)
Employment Workspace	E(g)	714	793
Community	F1 & F2	2,369	2,632
Nursery	E(f)	225	250

Table: Summary of proposed land uses in the Outline Element of the Masterplan

- 5.31 Illustrative plans have been submitted that show one way in which the development could be delivered in accordance with the parameter plans. Further details on the final design proposals will come forward as part of Reserved Matters Applications.
- 5.32 A Design Code has also been submitted and updated during the application process that seeks to establish a robust design framework for the proposed development. The Design Code sets out the parameters within which the design of the development, including architectural style and materiality, public realm design, layout and scale will be expected to comply at the Reserved Matters stage. Future Reserved Matters submissions would have to accord with all the aforementioned control documents.

Environmental Statement

- 5.1. In November 2021 AECOM undertook a review of the Environmental Impact Assessment (EIA) Scoping Report for the Proposed Development in order to advise on the adequacy of the scope of the associated EIA (21/03691/SCOP).
- 5.2. The application is supported by an assessment of the environmental impacts arising from the proposed development in the form of an Environmental Statement (ES) submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017). Aecom were instructed to undertake an independent review of the submitted ES chapters.
- 5.3. The ES considers the likely significant effects of the proposed development, as well as the likely significant cumulative effects that may result from the proposed development and other developments in the area. The topics addressed in the ES are:
- Traffic and Transport
 - Noise and Vibration
 - Air Quality
 - Climate Change
 - Wind Microclimate
 - Daylight and Sunlight and Overshadowing
 - Ground Conditions
 - Ecology
 - Historic Environment
 - Socioeconomics
 - Summary of Significant Effect
 - Townscape and Visual Impact Assessment
- 5.4. The findings of the ES Review were presented in the ES Review Report issued by Aecom on 4th November 2022. Responses to the ES Review comments were received from the Applicant during November and December 2022. Aecom reviewed responses and identified whether items were resolved, or further information was required. AECOM's final response was issued on 8th March 2023.
- 5.5. In May 2023 Aecom reviewed a further set of responses provided by the Applicant (referred to the Applicant's 2nd Response). The purpose of this review was to close out comments where appropriate and to identify those comments

which were to be resolved through the provision of further information in an ES Addendum.

- 5.6. In July 2023 the Applicant submitted an ES Addendum and a revised Non-Technical Summary, to present and assess revisions to the design following changes to fire regulations and the requirement for a second staircase, and to address feedback received on the planning application. AECOM carried out a review of the ES Addendum, the results of which are set out in the Joyce and Snells ES Addendum Review, August 2023.
- 5.7. A replacement ES Addendum was submitted in April 2024 and subsequently reviewed by Aecom. The review is to ensure the April 2024 ES Addendum has been prepared in accordance with relevant best practice guidance and adheres to recognised methodologies or suitable variations as well as compliance with the EIA Scoping Opinion.
- 5.8. The findings of the ES review of April 2024 and the revisions that have been made since its original submission, including as clarified, are discussed in the body of this report. There is a clarification in relation to the methodology of population modelling which remain. Members will be updated further at the meeting. Any adverse environmental effects have been identified. Overall, the appropriate matters have been taken into account and if planning permission were to be granted, mitigation measures, where possible, could be secured by planning conditions and/or planning obligations as appropriate and these are identified in the report.

6. Relevant Planning Decisions

Application Site

- 6.1 Land Rear of Wadham House, 12 College Close, London, N18 2XT application 22/03821/PADE for the Demolition of a row of 15 garages to slab level was Granted 06.12.2022
- 6.2 Public Footpath and Land at Eagle Court, 35 Snells Park London, N18, application 23/00097/CEA for Installation of a temporary transforming station was Granted 09.03.2023.
- 6.3 Joyce and Snells Estate, London, N18, application 21/03691/SCOP for request under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for a EIA Scoping Opinion for proposed redevelopment of Joyce Avenue and Snells Park Estate, comprising up to 1,992 (Class C) residential units and a range of Class E uses (retail and employment), Class F2 use (civic/community) and open space was Decision Issued 17.11.2021.
- 6.4 Garages 1 To 15 Rear Of 101-132 Snell's Park Estate, N18 2SY, planning application 21/03375/RE4 for the Temporary change of use of the site to Workspaces (Class E, F2) and Bus Cafe (Class E(b)) involving new roof structures to existing garages and erection of two storey commercial units and erection of new canopy structure to courtyard was Granted 20.12.2021.
- 6.5 Joyce and Snells Estate, London, N18, pre-planning application 16/03203/PREAPP for Proposed redevelopment of sites and erection of 970

residential units (Joyce Avenue site) and erection of 1,010 residential units (Snells Park site) was issued 16.08.2016.

- 6.6 92-342 Joyce Avenue, London, N18, pre-planning application TP/95/1046 for the Alteration to approved layout of 6 garages in connection with residential development granted under planning reference TP95/0103 (Retrospective) was Granted 26.01.1996.

Adjoining Sites

- 6.7 High Road West, N17, planning application reference HGY/2021/3175 for Hybrid Planning application seeking permission for 1) Outline component comprising demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), business (Use Class B2 and B8), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and 2) Detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works (EIA development - ES viewable on Council website & at The Grange N17). 1) Outline: * Demolition of most buildings (with retention of some listed & locally listed heritage assets); * New buildings at a range of heights including tall buildings; * Up to 2,869 new homes in addition to Plot A (including affordable housing); * At least 7,225sqm of commercial, office, retail, & community uses (incl. new library & learning centre); * New public park (min 5,300sqm) & New public square (min 3,500sqm); & * Other landscaped public realm and pedestrian & cycle routes. 2) Detailed: Plot A - Demolition of 100 Whitehall Street & Whitehall & Tenterden Community Centre and erection of new buildings of 5-6 storeys containing 60 new affordable homes & open space was Granted 31/08.2022.
- 6.8 The Goods Yard and the Depot, 36 & 44-52 White Hart Lane and 867-879 High Road (and Land to the rear), Tottenham N17, planning application reference HGY/2021/1771 for the (i) the demolition of existing buildings and structures, site clearance and the redevelopment of the site for a residential-led, mixed-use development comprising residential units (C3); flexible commercial, business, community, retail and service uses (Class E); hard and soft landscaping; associated parking; and associated works. (ii) Change of use of No. 52 White Hart Lane from residential (C3) to a flexible retail (Class E) (iii) Change of use of No. 867-869 High Road to residential (C3) use. This proposal is accompanied by an Environmental Statement - Allowed on Appeal dated 24.10.2022.
- 6.9 Upton and Raynham Road, N18, planning application 21/04271/RE4 for the Removal of the Beck House slab and associated ground works on Upton Road and construction of 134 residential dwellings (Use Class C3) and up to 188sqm flexible commercial floorspace (Use Class E) comprising buildings up to 7 storeys in height, and the change of use of ancillary garages to part of lower ground floor of Scott House (Use Class C3) to provide up to 70sqm community hall (Use Class F2(b)), 45sqm ancillary management office (Use Class C3), podium deck, along with associated means of access and highways works; car and cycle parking; hard and soft landscaping; play space and public, communal, and private realm; refuse storage; ancillary plant and structures; and works to Scott House to create new access at lower ground and ground floor levels was Granted on 31.03.2022.

- 6.10 Edmonton Green Shopping Centre and Adjoining Land (bounded By Fore Street/The Broadway, Hertford Road, Monmouth Road and Plevna Road), Enfield, N9, planning application 20/04187/OUT for the HYBRID PLANNING APPLICATION for the following: DETAILED planning application for Phase 1, for the demolition of the existing car park, access road and parking ramp that serves the roof of 1 West Mall, Edmonton, London N9 0AL (Asda) building and structures for erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), residential units (use class C3), infrastructure landscaped amenity space, car parking, cycle parking and associated works; and A phased OUTLINE planning application (Phases 2-4) (all matters reserved) for the balance of the site for: 1. The proposed demolition of buildings and structures; 2. The erection of buildings, including tall buildings, and works of alteration to existing buildings for the following uses: a) Flexible Commercial Floorspace (Use Class E); b) Bars/drinking establishments, Hot Food Takeaways and Leisure Uses (Use Class Sui Generis); c) Covered Market (Use Class E); d) Community and Leisure (Use Classes F1, F2 and Sui Generis); e) Residential Floorspace and the remodelling of existing residential entrance space for Grampian, Mendip and Pennine Houses (Use Class C3); 3. Associated infrastructure; 4. Streets, open spaces, landscaping and public realm; 5. Car, motorcycle and bicycle parking spaces and delivery/servicing spaces; 6. Utilities including electricity substations was Granted on 18.11.2022.
- 6.11 104-110 Fore Street, N18, planning application 20/00804/PRJ for the Change of use of first floor from office (Class B1a) to 8Nos. self-contained residential units (Class C3) was Granted on 15.05.2020.
- 6.12 50 - 56 Fore Street London N18, planning application 20/01742/FUL for the Redevelopment of the site involving demolition of the existing building and the erection of a new development comprising a residential use (Class C3) with flexible community/commercial space at ground floor (Class A1/A3/A4/D1), creation of landscaping and associated works, Resolution to Grant Planning Permission subject to completion of a Section 106 Agreement
- 6.13 79 Fore Street N18, planning application 17/05524/FUL for the Erection of a three-storey rear extension to provide 3 x self-contained flats comprising (1 x 2 bed and 2 x 3 bed involving change of use of 1 residential unit into Office use (A2) together with associated car parking and refuse storage was Refused 13.03.2019. Allowed at Appeal.
- 6.14 1 Grove Street, Enfield N18, planning application TP/06/0397 for the Demolition of existing building and erection of a 4-storey building comprising 24No. one bed flats with front and rear balconies (north and south elevations), Juliet balconies to the side (east and west) elevations, vehicular access to Grove Street and associated covered bicycle storage was Granted on 01.06.2006.
- 6.15 Land West of Meridian Water Station, South of A406, Fore Street, N18, planning application 22/02777/FUL for the Phase 2 Part 1 of new 23km Borough-wide district heating distribution network in Enfield comprising at this stage pipework of approximately 2km in length was Granted on 19.12.2022.

7. Consultations

Pre-Application Consultation

- 7.1. The applicant undertook extensive pre-application consultation and engagement with the local community. This included four public exhibitions from 2017 – 2021 (x2 in person; x2 virtual) leading to a public ballot in December 2021. A resident Steering Group was also established, with all residents invited to join via newsletter which was delivered to all homes. The Group, which has 60 members, first met in 2018 and there have been 17 meetings in total.
- 7.2. In addition, online polls have been run with residents, covering a range of topics. This resulted in information being fed into the design process. The project team also undertook extensive door knocking and telephone calling to provide one to one discussion and all landlord offer documents were hand delivered.
- 7.3. The Estate Ballot in December 2021 resulted in an 85% turnout. In accordance with Mayors Good Practice Guide to Estate Regeneration, development should only proceed with the majority of resident support. 78.5% voted 'yes' for the re-development of the estate.

Tenure	Total Votes	Eligible Votes	Turnout %
Council Tenants	363	427	85
Leaseholders/Freeholders	165	186	88
Housing Association	20	22	90
Temporary Housing Tenants	9	22	40
Totals	557	657	85

- 7.4. Following the positive outcome of the ballot, the applicant carried out further consultation with a variety of stakeholders, including with the wider community and local businesses adjacent to and nearby the estate. This involved both virtual and in person exhibitions held at the Angel Community Centre on the 14th March 2022 and at Boundary Hall on 17th and 19th March 2022.
- 7.5. The submitted Statement of Community Involvement describes the overall consultation and engagement process from 2017 to the present time, setting out the relevant activities and events through the pre-application stage, including pre and post the estate ballot. Themes emerged through the engagement. These related to improved security, green spaces, better and secure parking, sustainable and energy efficient homes and housing need.
- 7.6. The process has been inclusive and extensive and demonstrates that responses have addressed the key issues raised, and a responsive design process with a continued significant level of support for the proposed scheme. This process has been recognised and supported by the GLA.

Enfield Place and Design Quality Panel (DRP):

- 7.7. The proposed development was brought to the Enfield Place and Design Quality Panel (referred to as DRP) on six occasions:
- 26 September 2019;
 - 26 May 2020;

- 20 May 2021;
- 15 September 2021;
- 7 October 2021;
- 21 April 2022.

7.8. A summary of the conclusions made, along with officer comment as to the degree to which the applicant has addressed DRP conclusions from the final DRP on 21 April 2022, which covered the Hybrid Scheme, is outlined below:

- “Overall, the masterplan has come together well. The panel’s comments seek to highlight areas of potential improvement; but the good work that is coming out of the proposals is also acknowledged and applauded.”

Officer comment: Noted

- “Overall, movement, routes and legibility issues have been resolved. The design team could be more ambitious on promoting a modal shift through the street design.”

Officer comment: The Site has a clear east west / north south axis. These provide clear pedestrian and cycle routes through the Site, as well as clear connections to the surrounding footpath road network. The enhancements to open space will make a small qualitative uplift and a considerable improvement to the legibility and permeability of the Site.

The scheme will be providing car parking for existing residents only. As such the proposal is assisting in a modal shift.

- “The aspirations for sustainability and social value, whilst welcome, are still vaguely defined. Whilst understanding that an options appraisal is still ongoing the panel would encourage the design team to commit to ambitious KPIs.”

Officer comment: The proposed energy strategy is in line with the London Plan. The proposed scheme will connect to the Meridian Water District Heat Network (DHN) which is supported and will reduce carbon emissions. The proposal is compliant in terms of biodiversity net gain, Urban Greening Factor, sustainable drainage and would provide 726 new trees.

In addition, the proposal offers, right of return and single decant for existing residents on the estate. The scheme would provide additional housing, community facilities, including a community centre, nursery, an improved and new MUGA, improved integration with the existing school and new and improved connections with the wider environs. Overall, the scheme is considered to deliver a sustainable form of development.

- “Block A is working well to mediate between the homes on College Close and the larger scale to the south.”

Officer comment: Noted. Full consideration is given in the Urban Design section of the report.

- “Block D is an attractive building and piece of townscape with an excellent podium design. There are some concerns about the interaction with the

public realm, quality of accommodation and the pocket park space to the north.”

Officer comment: Full consideration is given in the Urban Design section of the report.

- “Block T is coming together well, and the panel commend Studio Gil on the progress that has been made”.

Officer comment: Full consideration is given in the Urban Design section of the report.

- Block K requires improvement to the appearance, materials and details to create a high-quality building for in a key location fronting the park.”

Officer comment: Full consideration is given in the Urban Design section of the report.

- “Block N is progressing in the right direction, but the panel are concerned about the appearance and detail of the retail units and landscape to Fore Street.”

Officer comment: Full consideration is given in the Urban Design section of the report.

Statutory and Non-Statutory Consultees

External Consultees

7.9. Cadent Gas: No comment. Informative added.

7.10. Environment Agency: No objection, subject to condition on water consumption limits. The Flood Risk Assessment should form an approved document.

Officer comment: Water consumption condition and Flood Risk Assessment as an approved document in the above recommendation.

7.11. Energetik: No objection. The Energy Statement that advises that the development will connect to the decentralised energy network.

Officer comment: confirm connection to DEN forms part of the shadow s106 in the recommendation above.

7.12. Enfield Disablement Association: No comment.

7.13. Historic England: No objection. Suggest Local Planning Authority seeks the views of specialist Conservation and Archaeological advisers.

Officer comment: Enfield’s Conservation Officer has been involved in both pre-application discussions and the assessment of the application. Their specialist input has been taken into account in the assessment of the application, as set out below. This harm to the non-designated and designated heritage assets has been weighed against the public benefits arising from the proposal.

- 7.14. Historic England (GLAAS): No objection, subject to conditions.

Officer comment: confirm conditions included in the recommendation above.

- 7.15. Greater London Authority (Mayor):

Estate Regeneration

The scheme would provide a significant overall net increase in social rent accommodation. Other key principles set out in the London Plan and the Mayor's Good Practice Guide to Estate Regeneration would be met in terms of the right to remain, a fair deal for leaseholders and public consultation and engagement. The phased demolition and comprehensive redevelopment of the estate can therefore be supported.

Officer comment: the phasing plan is secured via condition. The level of affordable housing to ensure decant is secured as part of the shadow s106.

Land Use Principles

Residential-led mixed use redevelopment of the site is supported. The quantum and spatial distribution of commercial and employment workspace use is acceptable. The approach to the phasing and reprovision of social infrastructure is acceptable and should be secured.

Officer comment: Social infrastructure is secured via minimum floorspace set out on the parameter plans. A continuity plan is also secured in the s106 to ensure no temporary loss of social infrastructure. A grantian condition is also recommended prior to demolition of Boundary Hall to ensure meanwhile facilities are provided.

Housing and Affordable Housing

The proposed affordable housing represents 53% of the total housing proposed by habitable room (49% by unit), of which, 68% is social rent. The applicant's FVA is currently being scrutinised by GLA officers to ensure this provides the maximum viable amount of affordable housing. Early, mid and late-stage viability review mechanisms are required.

Officer comment: Independent review of the applicants FVA concludes 53% (based on hab. room) is the maximum affordable housing proposal the scheme can currently offer. Review mechanisms, early, mid and late-stage viability reviews are secured in the shadow s106.

Urban Design

The design, layout and landscaping of the scheme is strongly supported. The architectural and materials quality and residential quality would be of a high standard. Tall buildings are proposed in a location which is not identified as suitable for tall buildings in Enfield's adopted Local Plan, so the application does not meet the locational / plan-led criteria in the London Plan. However, the visual, functional, environmental and cumulative impact of the tall buildings is considered to be acceptable in this instance.

Officer comment: these are discussed in further detail, in the body of the report.

Heritage

The application would cause a low level of less than substantial harm to heritage assets along Fore Street and High Road. This harm could be clearly outweighed by the significant public benefits associated with the development.

Officer comment: the level of harm is weighed against the benefits of the proposal and in the planning balance.

Transport

The trip generation assessment should be revised to confirm the impact on the capacity of Silver Street Station and bus services. Once the revised assessment has been agreed, financial contributions will be required to mitigate the impact of the scheme which should be secured via s106 agreement. In addition, further discussion is required in relation to the proposed new crossing of the A406 North Circular Road and modelling undertaken to support this.

Officer comment: TfL have confirmed they are satisfied with the applicant methodology and confirm there are no impacts on transport infrastructure including the rail, road and bus network. Financial contributions have been agreed for signalised crossing over the A406 and will be secured in the shadow s106.

Climate Change

The energy strategy is supported and is in line with the London Plan. Connection of the scheme to the Meridian Water District Heat Network (DHN) is proposed, which is supported in line with the London Plan heat hierarchy and should be secured. Further information on the connection to the DHN is required to set out the feasibility, network capacity and delivery timescales.

Officer comment: Energetik have confirmed there is sufficient capacity for future connection to the DEN. The future connect to the DEN is secured via the shadow 106.

Urban Greening

The urban greening strategy is supported and is in line with the London Plan. The tree retention strategy is acceptable, and the loss of trees has been justified and would be mitigated appropriately via the proposed replanting.

Officer comment: Recommended conditions to ensure the future of retained trees during construction and details of new trees to be provided in landscaping condition.

Other environmental issues

The approach to air quality and noise issues is acceptable. However, further information is required to demonstrate that the application would meet the air quality positive criteria, in accordance with London Plan Policy SI1.

Officer comment: An ES addendum has been submitted. The Environmental Health Officer has raised no objections to air quality.

- 7.16. Transport for London: No objection, subject to Sterling Way/College Close junction crossing funding (50% by the applicant) secured.

Officer Comment: match funding will be secured in the Shadow s106 and paid in two instalments in detailed phases.

- 7.17. London Fire Brigade: No comment.
- 7.18. London Borough of Haringey: No comment.
- 7.19. Metropolitan Police (Secured by Design): No objection, subject to condition on Secure by Design.

Officer comment: Conditions have been included as per the recommendation above and use of community space in Block G for use by the Met Police.

- 7.20. Natural England: satisfied with the SAMM and SANG mitigation measures proposed, subject to mitigation measures secured.

Officer Comment: The measures identified within the Habitat Regulations Assessment are to be secured via planning obligation. £450,000 enhancements to the Pymmes park trail and SAMMs contributions are to be secured in the shadow s106.

- 7.21. Network Rail: No objection. Informative recommended.

- 7.22. NHS - London Healthy Urban Development Unit (HUDU): identify the need for mitigation to be secured through the S106 agreement to enable expansion of the capacity of health infrastructure within the vicinity of the Site. A request has been made for a contribution of £2,719,401. The timing of the contribution would allow the Integrated Care Board to deliver the capacity alongside the new population.

Officer Comment: The shadow s106 secures the capital payment at the point of population uplift (Phase 5).

- 7.23. Sport England: the development is likely to generate a future demand. On this basis, consideration should be given by the Council for informing the level of any financial contribution if indoor sports provision was to be made through a S.106 agreement.

The potential users of the proposed MUGA should be engaged throughout the design process so that the proposed MUGA would reflect their needs and align with Sport England's *Design Guidance Note "Artificial Surfaces for Outdoor Sport"*.

Sport England also recommend that the applicant considers installing sports lighting or ducting to allow the retrospective installation of sports lighting.

Officer comment: £500,000 has been secured for offsite improvements to Florence Hayes recreation ground and Pymmes Park for sports and recreation in the vicinity of the development. This will be secured in the shadow s106.

- 7.24. Twentieth Century Society: Objection. Loss of the existing estate and loss of embodied carbon due to demolition.

Officer comment: the loss of the non-designated heritage asset would cause harm and the loss in significance has been weighed against the benefits of the proposal. Conditions and obligations have been secured to ensure Whole Life Carbon, carbon off setting and sustainability measures to offset the loss of embodied carbon.

- 7.25. Thames Water/water sewage undertakers: No objection, subject to conditions.

Officer comment: confirm conditions are included in the recommendation above.

- 7.26. Health and Safety Executive: No objection subject to condition requiring the submission of a satisfactory fire statement with any reserved matters application, and that HSE (Planning Gateway One) is consulted in conjunction with the Local Planning Authority's consideration of any reserved matters application.

- 7.27. Officer comment: Second stairs have been introduced in all blocks over 18m in the detailed phases. A condition is recommended to ensure the detailed element is carried out in accordance with approved fire statement and for the submission of a fire statement on reserved matters applications. Consultation will occur with HSE on any buildings over 18m at a future date.

- 7.28. REACT: request confirmation of where the notice board is to be relocated.

Officer comment: This is to be included as part of Grampian condition for the reprovision of Boundary Hall, prior to the demolition of the existing building.

- 7.29. Secretary of State: SoS notified as the scheme is EIA development. No comment.

- 7.30. UK Power Networks: No objection. Informative recommended.

Internal Consultees

- 7.31. Building Control Officer: No comment.

- 7.32. HASC Health: No comment.

- 7.33. Urban Design: There has been significant involvement with the pre-application process, DRP and other relevant stakeholders. A street-based approach with perimeter blocks creates a legible, human scaled proposal with a strong public front and secure private amenity. Heights and massing across the site are carefully distributed to avoid undue impact on Fore Street whilst marking key nodes in the development and the gateway to the site. These buildings are not overly tall and where height is used it is strategically placed using buildings of a high-quality design. There is concern over the level of detail on the materials. On balance, the development is a high-quality development.

Officer response: A condition will be imposed requiring details of materials to be submitted to ensure the development is of a high quality. The TVIA and CGIs demonstrate the detailed buildings to be of high quality. Architect retention is to be secured in the shadow s106 to ensure the development is of high quality.

- 7.34. Conservation Officer: The proposal will result in total loss in significance of the Joyce and Snell estate. To non-designated heritage assets outside the site the proposals will result in neutral to moderate harm. The proposal will result in less than substantial harm to the significance of designate heritage assets (listed building and conservation area). Enhancement works would reduce the harm caused and/or result in heritage benefits. Enhancement works are recommended to be secured through conditions and shadow S106 Agreement.

Officer comment: The less than substantial harm identified is weighed against the benefits of the application, noting that considerable importance and weight should be attached to this harm. Enhancements are recommended to be secured via the shadow s106, including Fore Street public realm/heritage improvements.

- 7.35. Employment and Skills: Require commitments to apprenticeship places and minimum request on local labour and local spend on materials with scope to review and revisit phase by phase.

Officer comment: The shadow s106 is to secure these measures.

- 7.36. Education: Phases 0 to 3 would have a minimal impact on local schools and do not require S106 contributions at this stage. The timing of the financial contribution in the later phases is to ensure delivery of capacity alongside the new population and is subject to review.

Officer comment: Following the Education review assessment, a sum of £223,080 is required for SEND provision at the point of population uplift. This being £2,535 per identified additional pupil place for future outline phases, if required, and will be secured via shadow s106.

- 7.37. Parks: No comment.

- 7.38. Landscape and Public Realm: No comment.

- 7.39. Regeneration Leisure and Culture: No comment.

- 7.40. Environmental Health: No objection. There is unlikely to be a negative environmental impact, subject to conditions.

Officer comment: Conditions recommended are included in the recommendation above relating to ground contamination, remediation strategy and verification report, unidentified contamination, non-road mobile machinery, CEMP, sound insulation, acoustic report.

- 7.41. Traffic and Transportation: No objection subject to recommendations in shadow 106 for contributions, including CPZ, Travel Plan Monitoring and sustainable transport measures.

Officer comment: mitigation measures are to be secured in shadow s106 and conditions are recommended.

- 7.42. Trees: No objection, subject tree protection and high-quality landscape scheme.

Officer comment: conditions will be recommended.

- 7.43. Biodiversity Officer: No objection subject to conditions relating to biological enhancement, landscaping and CEMP.

Officer comment: conditions will be recommended.

- 7.44. SuDS Highways: No objection subject to conditions relating drainage strategy, verification and ground water monitoring.

Officer comment: conditions will be recommended.

- 7.45. Highways Services: Objection. The use of 450 x 450 modular paving slabs is not acceptable to Highways on public adopted footpaths. Need to be changed to slabs 600mm x 750mm laid in a staggered bond. Alternatively block paving or asphalt are acceptable.

Officer comment: the applicant has confirmed the use of appropriate slabs and details will to be secured by condition.

- 7.46. Highways Improvements: No comment.

- 7.47. Highways Landscaping: No comment.

- 7.48. Climate and Sustainability Officer: No objection subject to payment of a Carbon Offsetting for Detailed Phases and future phases all to be secured in shadow s106.

Officer comment: A £153,457 carbon offset sum will be secured in shadow s106. Future phases will be required to submit an Energy Statement.

- 7.49. Property Services: No comments.

- 7.50. Commercial Waste Management: No comments.

Public Consultation

- 7.51. Public consultation of this planning application involved notification letters being sent to 2,962 neighbouring properties (both within the estate and homes and businesses adjoining) on 11 October 2022. A press advert in the Enfield Independent was published 12 October 2022 and 20 site notices were erected on 13 October 2022. An additional printed copy of the Environmental Statement was placed at Fore Street Living Room Library and Enfield Town Library.

- 7.52. Amendments to the application were received on 17th July 2023. These changes were considered material to the scheme. As a result, a further period of consultation was carried out. Public reconsultation involved notification letters being sent to 2,962 neighbouring properties (both within the estate and homes adjoining) on 19th July 2023. A press advert in the Enfield Independent was published 19th July 2023 and 20 site notices were erected 20th July 2023.

- 7.53. Further amendments to the application were received on 11th April 2024. These changes were considered material to the scheme. As a result, a further period of consultation was carried out. Public reconsultation involved notification letters being sent to 2,962 neighbouring properties (both within the estate and homes adjoining) on 23rd April 2024. A press advert in the Enfield Independent was published 24th April 2024 and 20 site notices were erected 24th April 2024.

- 7.54. Overall, as a result of public consultation on the application, 8 (eight) representation were received, and a summary of reasons for comment is below:

- *Consultation*
Not enough dialogue with residents

- *Housing*

Loss of existing homes
Locals will not be able to afford homes
Doubling of the number of residents
Existing properties undervalued

- *Social Infrastructure*

Provision of no additional infrastructure
Lack of leisure facilities
Lack of green space within the development
No youth centre provided
Lack of health facilities within the development

- *Environmental Health*

Impacts on air quality
Quality of life will not be enhanced

- *Phasing and Construction*

More solidly built blocks are to be knocked down before less adequately maintained ones
Demolition from buildings will have an impact on public health

- *Transport*

Bus journey times will be delayed
Northbound bus lane should end at Colyton Way to allow longer flare to junction
Increase in traffic
SCOOT Traffic light system should be implemented
Loading bays sited that prevent functioning of the bus lane
Investment in additional enforcement cameras
Should provide a crossing at College Close to silver Street Station
Step free access should be provided at Silver Street Station

- *Development at adjoining sites*

The proposals to develop the site to 18 storeys is appropriate
Further detailed applications should respond positively to adjoining sites
The development should not prejudice adjoining site to Langehedge Lane
Noise should be appropriately managed to not have an adverse impact on adjoining sites – agent of change
The council should clarify the indicative road to the north

- *Other Matters*

Redevelopment should be sited elsewhere in the borough
Potential for antisocial behaviour to proposed public spaces
Impact on railway line

7.55 A representation was received from the Post Office and can be summarised below:

- *Loss of Post Office*

Proposed demolition and loss of Post Office
No replacement facility for Post Office to be provided

Officer comment: Block N is providing 455sqm of commercial floorspace in Phase 2. This is prior to the redevelopment of the section of the high street

(Phases 6 and 7). This therefore allows the Post Office the option to relocate and continuity in the provision of its services.

8. Relevant Policy

National Planning Policy Framework 2023

- 8.1. The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 8.2. The NPPF recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 8.3. In relation to achieving appropriate densities paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.

- 8.4. Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.
- 8.5. 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.
- 8.6. Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where: (a) the local planning authority cannot demonstrate a five year supply (or a four year supply, if applicable, as set out in paragraph 226) of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 77) and does not benefit from the provisions of paragraph 76; or (b) where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years.”
- 8.7. The Council’s recent housing delivery has been below the increasing housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and more recently being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.
- 8.8. The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the NPPF. It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.9. Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.10. In the period 2019/20 to 2021/2022, the Council has met 73% of its housing target delivering 995 homes in 2021/22. This is an improvement on the previous

year (847 completions) despite challenging market conditions. However, as delivery across three years is 73% of the Government's requirement, the Council is placed in the 'presumption' category. This requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5-year housing land supply which is monitored through the Annual Monitoring Report.

8.11. This is referred to as the "tilted balance" and the NPPF states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

8.12. The London Plan 2021

GG1	Building Strong and Inclusive Communities
GG2	Making the Best Use of Land
GG3	Creating a Healthy City
GG4	Delivering the Homes Londoners Need
GG5	Growing a good economy
GG6	Increasing efficiency and resilience
SD1	Opportunity Areas
SD6	Town centres and high streets
SD8	Town centre network
SD10	Strategic and local regeneration
D1	London's form, character and capacity for growth
D2	Infrastructure Requirements for Sustainable Densities
D3	Optimising Site Capacity through the Design-Led Approach
D4	Delivering Good Design
D5	Inclusive Design
D6	Housing Quality and Standards
D7	Accessible Housing
D8	Public Realm
D9	Tall Buildings
D10	Basement development
D11	Safety, Security and Resilience to Emergency
D12	Fire Safety
D14	Noise
H1	Increasing Housing Supply (*):
H4	Delivering Affordable Housing
H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H8	Loss of existing housing and estate redevelopment
H10	Housing Size Mix
S1	Developing London's social infrastructure
S2	Health and social care facilities
S3	Education and childcare facilities
S4	Play and Informal Recreation

S5	Sport and recreation facilities
E3	Affordable Workspace
E11	Skills and opportunities for all
HC1	Heritage Conservation and Growth
HC3	Strategic and Local Views
H7	Protecting public Houses
G1	Green Infrastructure
G4	Open Space
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodland
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI4	Managing Heat Risk
SI5	Water Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy
SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.1	Residential Parking
T6.3	Retail Parking
T6.5	Non-residential disabled persons parking
T7	Deliveries, Servicing and Construction
T9	Funding Transport Infrastructure through Planning
DF1	Delivery of the Plan and Planning Obligations

8.13. Mayoral Supplementary Guidance

- 8.14. Play and Informal Recreation (September 2012)
Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.
- 8.15. Sustainable Design and Construction (April 2014)
Seeks to design and construct new development in ways that contribute to sustainable development.
- 8.16. The Control of Dust and Emissions during Construction and Demolition (July 2014). The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, from construction and demolition activities in London.
- 8.17. Shaping Neighbourhoods: Character and Context SPG (2014)
Sets out the process of change which is brought about in a way which is responsive to individual places and locations.
- 8.18. Accessible London: Achieving an Inclusive Environment (October 2014)
The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.

- 8.19. Social Infrastructure SPG (2015)
Sets out the need for planning across services to ensure social infrastructure meets the broader built environment aims of the London Plan.
- 8.20. Housing (March 2016)
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.
- 8.21. Affordable Housing and Viability (August 2017)
Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.
- 8.22. Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration (February 2018)
Sets out the Mayor's policies for Estate Regeneration.
- 8.23. Cross Rail Funding SPG (March 2016)
Supports London Plan policies dealing with the funding of Crossrail and other strategically important transport infrastructure.
- 8.24. Be Seen Energy monitoring (September 2021)
To understand a buildings actual operational energy performance and work towards bridging the 'performance gap' between design theory and actual energy use.
- 8.25. Circular economy statement (March 2022)
Sets out circular economy principles at the heart of designing new buildings, requiring buildings that can more easily be dismantled and adapted over their lifetime.
- 8.26. Energy Planning Guidance (2020)
To demonstrate that the proposed climate mitigation measures comply with the London Plan.
- 8.27. Whole life cycle LPG (March 2022)
To provide a buildings carbon impact on the environment and carbon emissions resulting from the materials, construction, and the use of a building over its entire life, including its demolition and disposal.
- 8.28. Local Plan – Core Strategy
- | | |
|----------------|--|
| Core Policy 3 | Affordable Housing |
| Core Policy 4 | Housing quality |
| Core Policy 5 | Housing types |
| Core Policy 7 | Health and Social care facilities and wider determinants of health |
| Core Policy 8 | Education |
| Core Policy 9 | Supporting Community Cohesion |
| Core Policy 11 | Recreation, leisure, culture and arts |
| Core Policy 13 | Promoting economic prosperity |
| Core Policy 16 | Taking part in economic success and improving skills |
| Core Policy 17 | Town centres |
| Core Policy 18 | Delivering shopping provision across Enfield |
| Core Policy 20 | Sustainable Energy use and energy infrastructure |

Core Policy 21	Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 22	Delivering sustainable waste management
Core Policy 24	The road network
Core Policy 25	Pedestrians and cyclists
Core Policy 26	Public Transport
Core Policy 28	Managing flood risk through development
Core Policy 29	Flood Management Infrastructure
Core Policy 30	Maintaining and improving the quality of the built and open environment
Core Policy 31	Built and landscape heritage
Core Policy 32	Pollution
Core Policy 34	Parks, Playing Fields and Other Open Spaces
Core Policy 35	Lee Valley Regional Park and waterways
Core Policy 36	Biodiversity
Core Policy 39	Edmonton

8.29. Local Plan – Development Management Document

DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More
 DMD3: Providing a Mix of Different Sized Homes
 DMD4: Loss of Existing Residential Units
 DMD6: Residential Character
 DMD8: General Standards for New Residential Development
 DMD9: Amenity Space
 DMD10: Distancing
 DMD15: Specialist Housing Accommodation
 DMD16: Provision of New Community Facilities
 DMD17: Protection of Community Facilities
 DMD18: Early Years Provision
 DMD25: Location for New Retail, Leisure and Office Development
 DMD27: Angel Edmonton, Edmonton Green, Southgate Green and Palmers Green District Centres
 DMD28: Large Local Centres, Small Local Centres and Local Parades
 DMD32: Managing Impact of Food and Drink Establishments
 DMD37: Achieving High Quality and Design-Led Development
 DMD38: Design Process
 DMD39: The Design of Business Premises
 DMD40: Ground Floor Frontages
 DMD41: Advertisements
 DMD42: Design of Civic/Public Buildings and Institutions
 DMD43: Tall Buildings
 DMD44: Conserving and Enhancing Heritage Assets
 DMD45: Parking Standards and Layout
 DMD47: New Road, Access and Servicing
 DMD48: Transport Assessments
 DMD49: Sustainable Design and Construction Statements
 DMD50: Environmental Assessments Method
 DMD51: Energy Efficiency Standards
 DMD52: Decentralized energy networks
 DMD53: Low and Zero Carbon Technology
 DMD55: Use of Roofspace/ Vertical Surfaces
 DMD56: Heating and Cooling
 DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement

DMD58: Water Efficiency
DMD59: Avoiding and Reducing Flood Risk
DND60: Assessing Flood Risk
DMD61: Managing surface water
DMD62: Flood Control and Mitigation Measures
DMD64: Pollution Control and Assessment
DMD65: Air Quality
DMD68: Noise
DMD69: Light Pollution
DMD70: Water Quality
DMD71: Protection and Enhancement of Open Space
DMD72: Open Space Provision
DMD73: Child Play Space
DMD78: Nature conservation
DMD79: Ecological Enhancements
DMD80: Trees on development sites
DMD81: Landscaping

8.30. Other Material Considerations

National Planning Practice Guidance
National Design Guide (2019)

GLA: Fire Safety LPG (draft)
GLA: Characterisation and Growth Strategy LPG (draft)
GLA: Housing Design Standards (draft)
GLA: Optimising Site Capacity: A Design-led Approach LPG (draft)
GLA: Urban Greening Factor (draft)
GLA: Air Quality positive (draft)
GLA: Air Quality neutral (draft)
GLA: Sustainable Transport, Walking and Cycling (draft)
GLA: Threshold Approach to Affordable Housing on Public Land (2018) –
Practice Note

Enfield Climate Action Plan (2020)
Enfield Housing and Growth Strategy (2020)
Enfield Intermediate Housing Policy (2020)
Enfield Biodiversity Action Plan
Enfield Characterisation Study (2011)
Enfield Local Heritage List (May 2018)
Enfield S106 SPD (2016)
Enfield Decentralised Energy Network Technical Specification SPD (2015)
Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
The Setting of Heritage Assets – Historic Environment Good Practice Advice in
Planning: 3, Historic England (2017)
TfL London Cycle Design Standards (2014)
Mayor's Transport Strategy (2018)
Healthy Streets for London (2017)

8.31. Enfield Draft New Local Plan and Draft Proposals Map

8.32. The New Enfield Local Plan (ELP) was published at Regulation 19 Stage between 28 March and 28 May 2024. 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.

- 8.33. The NPPF 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 the NPPF . As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight. At this stage, it has relatively little weight in the decision-making process.
- 8.34. It is not yet known whether the Council will submit the ELP for examination, but it is possible that more than limited weight could be given to a policy or group of policies if it were clear (i) that they are consistent with the NPPF and (ii) that there is no objection to them (in relation to the parts of the policies relevant for the decision).
- 8.35. However, if there are substantial objections to any policy then it would be unlikely that the Council could justify giving it more than limited weight.
- 8.36. Key local emerging policies from the plan are listed below:

Policy DM SE2 – Sustainable design and construction
 Policy DM SE4 – Reducing energy demand
 Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
 Policy DM SE7 – Climate change adaptation and managing heat risk
 Policy DM SE8 – Managing flood risk
 Policy DM SE10 – Sustainable drainage systems
 Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
 Policy DM BG8 – Urban greening and biophilic principles
 Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
 Policy DM DE2 – Design process and design review panel
 Policy DM DE6 – Tall buildings
 Policy DM DE7 – Creating liveable, inclusive and quality public realm
 Policy DM DE10 Conserving and enhancing heritage assets
 Policy DM DE11 – Landscape design
 Policy DM DE13 – Housing standards and design
 Policy DM H2 – Affordable housing
 Policy DM H3 – Housing mix and type
 Policy DM T2 – Making active travel the natural choice
 Policy SA15 - Draft Site Allocation
 Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

First Homes

- 8.37. On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this application, the WMS has been taken into account as a material consideration when considering this report and the officer's recommendation.

ANALYSIS

9. Main Planning Issues

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

- Principle of Estate Regeneration
- Land Use Principles
- Housing and Affordable Housing
- Design and Townscape
- Heritage and Conservation
- Residential Quality and Amenity
- Impact on Neighbouring Residential Amenity
- Open Space, Landscaping and Trees
- Habitat Regulations Assessment
- Biodiversity and Ecology
- Transport, Access and Parking
- Sustainability and Climate Change
- Noise and Air Quality
- Waste and Recycling
- Contaminated Land
- Fire Safety
- Flood Risk and Drainage
- Basement Development
- Socioeconomics and Health
- Wind and Microclimate
- Security and Safety
- Public Sector Equality Duty
- Section 106 and Community Infrastructure Levy

10. Principle of Estate Regeneration

10.1. The regeneration of the estate and the Council's re-housing strategy is to be based upon the principles set out within the Mayor's Good Practice Guide to Estate Regeneration (2018). These state, all estate regeneration schemes in London which involve the demolition of existing homes should provide:

- Like for like replacement of existing affordable housing floorspace
- An increase in affordable housing
- Full rights of return for any social housing tenants
- Fair deal for leaseholders/freeholders

10.2. Guidance on the regeneration of housing estates is contained within Policy H8 of the London Plan. This policy advises that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. It is recognised the redevelopment and intensification of existing housing estates play an important role in London.

10.3. The scheme would provide a significant net increase in the overall provision of social rented accommodation in terms of homes (no.191 social rented homes) and habitable rooms (no. 861 hab. rooms) across the site.

- 10.4. This is acceptable and complies with London Plan Policy H8 (Loss of existing housing and estate redevelopment). Amongst other things, this policy sets out the appropriate approach to estate redevelopment.

Fair deal for Leaseholders

- 10.5. The applicant carried out a ballot which was undertaken by an independent body, in line with the Mayor's Good Practice Guide to Estate Regeneration (GPGER) GLA funding guidelines. Residents voted 78.5% "yes" in favour of the regeneration proposals, with a turnout rate of 85.5%. This is supported and accords with the GPGER.
- 10.6. The applicant's Landlord offer sets out the principle that all existing secure tenants will be offered the right to remain with social rents provided with long-term secure tenancies on the same terms as they currently have. Households who are required to downsize would be provided with a home to match their occupancy needs. Also, any over occupied home has the option of a larger dwelling.
- 10.7. Of the 361 existing private tenure homes within the estate, 153 are resident owner occupied. The remaining 208 are non-resident occupied and let out to private tenants. The applicant's Landlord Offer sets out the commitment to ensure fair compensation for resident leaseholders on the site through independent market valuation with an additional 10% compensation, plus all reasonable legal and moving costs paid. Resident leaseholders would also be offered the opportunity to purchase a home within the redeveloped estate via either affordable shared ownership housing or a shared equity home. The scheme proposes a total of 125 shared equity homes. 75 of these homes would be in the Detailed Phases 0 to 3.
- 10.8. Residents who wish to move off the estate will receive compensation which will cover the reasonable cost of moving into their new home and specialist support from the Council's Leasehold Buyback Team, who will guide them through the process of identifying and purchasing their new home. The Council will retain ownership of the replacement and additional new homes for Council tenants. The overall approach to existing leaseholders and residents on the estate is supported and accords with the Mayor's GPGER.

Full and Transparent Consultation

- 10.9. Consultation and engagement with residents on potential options for regeneration/re-development began in 2017. This involved showcasing different approaches for the estate to deliver the required volume of housing, including full redevelopment, partial redevelopment, and infill development. The following activities took place during this period:
- Series of workshops to explore regeneration principles
 - Estate walkabouts with architects to identify issues
 - Site visits to other schemes
 - Letter drops
- 10.10. The responses were monitored by the applicant and the majority of residents consulted supported the full redevelopment approach.

- 10.11. The estate is predominately made up of social housing stock although does contain a portion of leasehold and freehold properties, housing association and private tenants as well as those in temporary accommodation. As such the proposals had to be put to an estate ballot. This is so residents could determine the future of their estate and so the Applicant could secure GLA funding, under guidance set out in the Mayor's GPGER, in July 2018.
- 10.12. The ballot was held in December 2021. 78.5% of voters, voted in favour of the redevelopment of the estate, with a turnout of 85.5%. This represents a strong mandate for the redevelopment of the estate and the proposed scheme. It represents one of the strongest residents' ballot results in London. Following the ballot, the ongoing consultation was expanded to include both residents of the estate and the wider residential and business community. Details of this are set out in the Statement of Community Involvement and Design and Access Statement, submitted with the application.
- 10.13. The approach to public consultation and engagement is considered acceptable and has involved meaningful and proactive engagement and feedback from residents in the consideration of options, design development and as part of the ballot undertaken in 2021.
- 10.14. The applicant has demonstrated that a thorough, inclusive and well-considered approach to consultation and engagement with the local community. The process has enabled greater involvement and co-ordination and has positively informed the proposed scheme of re-development. This approach is therefore acceptable and accords with the expectations set out in the Mayor's GPGER.

Consideration of Alternative Options

- 10.15. London Plan Policy H8 states, that before considering demolition of existing estates, alternative options should first be considered, and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts.
- 10.16. Feasibility studies were undertaken to consider potential options for the redevelopment of the estate. These options included infill development, partial redevelopment or full demolition and redevelopment.
- 10.17. The Council has identified several significant issues which have driven the proposals for comprehensive phased demolition and redevelopment. This includes the outdated design and layout of the estate which is lacking in legibility and poorly connected to its surroundings. The layout of blocks has resulted in poorly defined areas of public open space, movement routes and surface car parking which lack natural surveillance. The areas of public open space are not fully optimised in terms of their use and function. It is reported a number of the blocks have recurring maintenance issues and require substantial investment to bring properties up to modern standards. In addition, the internal residential homes and communal areas are dated and do not meet modern standards in terms of insulation, energy efficiency and private outdoor space.
- 10.18. The latter option for full demolition was preferred by the majority of residents. This allowed for the most comprehensive approach to be undertaken in addressing the issues highlighted above and also help to maximise the overall housing, regeneration, connectivity, public realm and place making benefits. The

site is proposed Site Allocation (SA15) in the Draft Enfield Local Plan for comprehensive redevelopment for residential uses and supporting social infrastructure. Whilst this policy and policy document is of little weight at present, given its stage in the adoption process, it does represent a direction of travel.

- 10.19. The applicants proposed scheme is based upon three key design concepts:
- To create a landscape-led masterplan with an ecological spine, for the benefit of people and nature.
 - To encourage strong communities through the creation of a range of spaces that improve resident needs.
 - A pedestrian focus on connecting the estate into the wider context, making an accessible place for all.
- 10.20. The Masterplan has sought to apply these concepts by providing a central civic and community hub, a public square, two news parks as well as landscaped courtyards and pocket parks and a central green spine along with improved north- south and east-west connectivity.
- 10.21. Officers agree that in this instance, the proposal for comprehensive redevelopment is appropriate, particularly noting the inherent problems which currently exist and strong mitigation by the phased, single decant approach proposed for existing residents, which would minimise disruption and seeks to retain households on the site as it is redeveloped.

Summary of Estate Regeneration

- 10.22. The proposals would ensure the like for like replacement of existing affordable housing floorspace, with a significant overall net increase (191 homes) in social rent accommodation. Other key principles set out in the London Plan and the Mayor's Good Practice Guide to Estate Regeneration would be met in terms of the right to remain, a fair deal for leaseholders and in relation to public consultation and engagement and exploration of alternatives for the redevelopment of the estate.
- 10.23. The Council has identified the Site as a flagship project of their house building programme and wider commitment to the regeneration of the Edmonton area, including Upper Edmonton, to provide a better, safer and sustainable neighbourhood. The comprehensive regeneration of the Site is proposed to be pivotal to this transformation and provide a significant component in meeting the housing delivery needs of the Borough and over the Plan period.
- 10.24. The phased demolition and comprehensive redevelopment of the estate is therefore to be supported and is in accordance with London Plan Policy H8 and the Mayor's GPGER.

11. Land Use Principles

Housing

- 11.1. The London Plan (LP) supports the building of more homes through Policy GG4. This policy promotes the delivery of genuinely affordable homes and the creation of mixed and inclusive communities, with good quality homes that meet high standards. Policy GG2 requires development proposals to make the best

use of land by enabling development on brownfield land well-connected by public transport and by applying a design-led approach to determine the optimum development capacity of sites.

- 11.2. The LP also supports increasing housing supply and optimising housing potential through Policy H1, which states that the potential for housing delivery on all suitable and available brownfield sites should be optimised.
- 11.3. The LP Policy H1 sets a London wide 10-year housing target for 522,870 net additional homes to be completed by 2029, with Enfield set a 10-year target of 12,460 new homes during this period. The proposals would result in a significant net increase of 1,233 additional homes (2,028 less 795 existing homes). This equates to approximately 10% of Enfield's 10-year housing target.
- 11.4. Enfield's Core Strategy (CS) (adopted 2010) supports the provision of high quality, inclusive and affordable homes, seeking to meet and exceed the borough housing targets (set by the Mayor of London).
- 11.5. The Enfield Draft Local Plan includes the Site within the Angel Edmonton Urban Placemaking Area, led by draft Strategic Policy SP PL4: Angel Edmonton. This sets out the aspirations for the area, including an offer of a range of housing typologies and the potential for denser forms of residential growth. The Site forms the majority of draft Site Allocation 15 (SA15) in the draft Policies Map, which is in consultation alongside the draft Local Plan. This estimates a net housing capacity of 1,217 homes for the entire Site Allocation. Although of limited weight at this stage, the draft allocation supports comprehensive redevelopment for residential uses and supporting infrastructure and the proposed 2,028 residential units as part of this application are considered proportionate to the area of the Site Allocation, that the Site comprises.
- 11.6. Enfield Housing's Trajectory Report 2019 shows that during the preceding 7-years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with 51% of approvals over the preceding 3-years having been implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 11.7. It is clear there is an identified need for additional housing and, in particular, affordable housing. The proposal for 2,028 affordable and market homes accords with London Plan Policy GG2, which advocates making the best use of land and building to suitable densities on well-connected sites. The aim to strengthen the provision of housing on a site that is already residential, and is within a residential setting, is supported. The proposal seeks to extend the provision of housing by making more efficient use of land and providing high quality of homes where the existing building no longer presents an optimal housing offer.
- 11.8. Reviewed against strategic policies of the Development Plan and emerging Local Plan policies, the principle of residential housing at this Site is supported. The residential-led regeneration of the Site would make a substantial contribution towards meeting local and strategic housing targets and is strongly supported, in accordance with London Plan Policy H1, which seeks to increase

housing supply by optimising the potential for housing delivery on suitable brownfield sites.

Non-Residential Uses

11.9. Currently, there is approximately 5,164 sqm of civic and commercial uses within the site boundary. Within units fronting Fore Street there is 3,108 sqm of retail floorspace, located within the district centre boundary. The commercial and civic uses also include Fore Street Library as well as a pharmacy, dental practice, opticians and post office and a range of independent commercial retail uses which serve the existing community.

11.10. The proposed development includes employment, nursery, civic and retail floorspace uses. The proposed non-residential floorspace (ie retail, employment, community, leisure) represents an overall uplift of floorspace by 1,595 sqm to 6,759 sqm. The relevant Use Class and uplift in floorspace (sqm) are set out in the table below:

Existing Use	Existing Floorspace (sqm)	Proposed Floorspace (sqm)	Difference (sqm)	Outline Element	Detailed Element
Retail	3,108	2,981	-127	2,526	455
Employment - Workspace	698	793	+95	853	0
Other Town Centre (a)	534	0	-534	-534	
Civic/Community (b)	824	2,735(c)	1,911	2,632	103
Nursey	-	250	250		
Total	5,164	6,759	+1,595		

Masterplan – Existing and Proposed Non-residential floorspace

(a) includes betting office 95 Fore Street (sui generis), mini-cab office 115b Fore Street (sui generis), dental practice 91 Fore Street (E(e)), and doctors GP practice 107 Fore Street (E(e))

(b) includes Boundary Hall, Library 109-111 Fore Street, and Community Hall

(c) includes new civic hub

Block	Proposed Use Class	Commercial (sqm)	Civic community (sqm)	Employment (sqm)	Nursey (sqm)
C	E (a-e)	695		433	
D	F1 (a-e) / F2 (a-b)	0	103		
E	E (a-e)	675		360	
G	F1 (a-e) / F2 (a-b)	148	2,632		
M	E (a-e)	208			
N	E (a-e)	455			
O	E (a-b) / Sui Generis	499			
P	E (a-b) / Sui Generis	301			
Q	E (f)	0			250

Total		2,981	2,735	793	250
Total	6,759sqm				

Masterplan - Proposed Non-residential floorspace by Block

- 11.11. A total commercial /retail floorspace of 2,981sqm is proposed. The proposals would result in a small net loss of retail (Use Class E a/b/c) of 127sqm. This is offset by an uplift (1,595sqm) and more diverse range of high-quality new community, leisure, education and commercial uses and employment worker spaces.
- 11.12. The proposed uses within Class E and Sui Generis summarised above, are to be provided at ground floor level and fronting onto Fore Street and the newly created public spaces at the Fore Street Square and Southern Gateway.
- 11.13. Within the Detailed element of the scheme 455sqm of retail floorspace is proposed within the ground floor of Block N, fronting Fore Street (Phase 2). The remaining commercial floorspace would be brought forward in the relevant blocks as part of Reserve Matters Applications. Conditions, Development Specification and parameter plans will secure the commercial floorspace as a minimum to ensure the range of uses would be ensured to serve the local and wider community.
- 11.14. The Masterplan proposes up to 6,759 sqm. of non-residential use. The quantum and spatial distribution are considered commensurate for a scheme of this nature. The Outline element of the proposal would be controlled by the following maximum and minimum floorspace parameters in the Development Specification and parameter plans and restrictions of certain use, by condition.

Land Use	Class	Minium Sqm	Maximum Sqm
Retail/Commercial (Drinking Establishment)	E (Sui Generis)	2,273 (360)	2,526 (400)
Employment Workspace	E(g)	714	793
Community	F1 & F2	2,369	2,632
Nursery	E(f)	225	250

Table: Min. and max. proposed non-residential uses, outline element

- 11.15. The proposed uses (commercial, employment, community and Sui Generis) are discussed in further detail, below:
- 11.16. *Impact on the Angel Edmonton District Centre, Loss of Retail Floorspace and Sequential Test:* 1,518sqm of the proposed retail/commercial uses would be maintained within the designated Angel Edmonton District Town Centre (within Blocks C, E and G along Fore Street). Further expansion of commercial uses is proposed south (located within Blocks N (detailed), M, O and P (outline), totalling 1,463sqm, along Fore Street and would sit outside the District boundary.
- 11.17. The NPPF, LP Policy SD7, CS Policy 17 and DMD 25 set out Enfield's 'town centre first' approach. This seeks to manage development outside defined centres through sequential assessments.

- 11.18. Overall, there would be a reduction of 127sqm of commercial/retail floorspace within the District Centre and in addition to the quantum of floorspace proposed for the commercial uses outside of the district boundary (above the local threshold of 400 sqm), a sequential test has been undertaken to justify the proposals. In accordance with the requirements of the NPPF and CS Policy 17, it is therefore necessary to consider the appropriateness of the proposals in the context of the sequential and impact assessments, including an assessment of current levels of vacancies within the Angel Edmonton District Town Centre.
- 11.19. Paragraph 24 of the NPPF states local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre. Paragraph 2b-001 of the Government's Planning Practice Guidance (PPG) advises how the sequential test should be used in decision making and states that it "should be proportionate and appropriate for the given proposal". Paragraph 2b.011 of the PPG states that the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations.
- 11.20. The applicant has submitted a sequential test in support of the application. The assessment took account of vacant retail units within the Angel Edmonton District Town Centre. Five vacant units were identified by an onsite survey. Of those identified, investigations showed these were either small, physically run down or older retail floorplates. The sequential test shows there are no appropriate units for the quantum of retail proposed.
- 11.21. Following on, criteria ii. of DMD 25 states, in accordance with the sequential test, if no sites are suitable or available within the town centres listed in part i., then retail development at edge of centre locations that are accessible and well connected to and up to 300 metres from the primary shopping area will be permitted. The proposed commercial uses in Blocks N (detailed), O and P (outline) would be located within an acceptable distance of Angel Edmonton District Town Centre.
- 11.22. Overall, there would be no significant adverse impact from the proposed E Use Classes and would not result in adverse impact on the vitality and viability of the district centre. The proposal would not conflict with the underlying objectives of London Plan Policy SD 7, Policy DMD 25 of the Enfield Development Management Policies which seeks to protect the function of District Centres.
- 11.23. *Sui Generis Use / Drinking Establishment*: 400sqm (GIA) is proposed for a public house, wine bar or drinking establishment and/or a drinking establishment with expanded food provision in Blocks O and P (outline) (*Sui Generis* - in a use class of its own).
- 11.24. DMD 34 supports proposals for diversifying the evening economy. A vibrant and diverse evening economy can bring benefits to the local economy through sustaining businesses and providing jobs, while providing venues for entertainment, culture and socialising to residents and visitors.
- 11.25. DMD 34 states a vibrant and diverse evening economy can bring benefits to the local economy. In suitable areas, the Council will encourage applications that add to the mix of uses and would be particularly in favour of applications that would seek to expand the diversity of the evening economy in Angel Edmonton. Blocks O and P are suitably located within 300m from an existing designated

centre and therefore the proposed use is considered appropriate in this instance. Furthermore, the proposed Sui Generis use would front on to a newly created public space at the Fore Street Square and help to create active frontages and to animate key public spaces.

- 11.26. The proposed Sui Generis Use is, in conjunction with flexible E Uses, considered appropriate and would help to create a diverse economy as part of the comprehensive redevelopment and commercial provision in the vicinity of the Angel Edmonton District Centre and busy thoroughfare of Fore Street and in accordance with DMD 34 of the Development Management Policies.
- 11.27. *Phasing of the development and impact on existing retailers:* Traders will not have to move early given the sequencing of the phasing. The existing commercial tenants are located within identified Phases 6 and 7 of the redevelopment (fronting Fore Street). It is the intention to keep the current parades active to allow for adjustment to the redevelopment. The phasing of the development and non-residential uses assists in the operation and consistency of existing businesses on site.
- 11.28. Block N will come forward in Phase 2 (of the detailed element) of development. This will provide 455sqm of commercial floorspace and will give commercial tenants the option to decant or temporarily relocate on the Site, prior to demolition in the northern part of the high street in the later Phases (6 and 7).
- 11.29. An objection has been received regarding the loss of the Post Office and the corresponding loss of social infrastructure. As set out above the sequencing of demolition of the commercial parade will allow for the re-provision of this service if the Post Office choose to remain on Site. In addition, those that choose to relocate elsewhere on a permanent basis will be supported to do so by the Council.
- 11.30. *Urban Design Rationale to Fore Street:* In addition to the application satisfying the sequential test, the land use approach is supported, considering the site circumstances. The expansion of the commercial retail uses along Fore Street would help to re-establish and reinforce the existing urban pattern helping to resolve some of the design challenges created by the irregular placement and layout of the slab blocks to the south of the Site.
- 11.31. Block N, in the detailed phases, would help to re-establish the urban form and would reflect the mixed-use character of the high street. There are comprehensive masterplan principles and overall urban design rationale and place making benefits associated with the proposed land use strategy which are supported.

Non-Residential Uses Summary

- 11.32. Based on the information submitted, the sequential test assessment addresses the likely impact on the vitality and viability of the District Centre. This concludes there would be no significant adverse impact from the introduction of the proposed E Class Uses on the existing Centre. Overall, the proposal would not conflict with the underlying objectives of Policy SD7 of the LP, CS 25 and DMD 25 of the Enfield Development Management Policies which seek to protect the function of Centres.

- 11.33. Subject to planning conditions, restricting potential uses to E Use class (E a - e) and Sui Generis, the proposals for commercial uses outside of the designated centre are not considered to unacceptably impact on the functioning of this centre and would re-establish the existing urban pattern and provide commensurate uses to the masterplan.

Employment Uses

- 11.34. The application proposes employment workspace suitable for small and medium sized and micro businesses within side street / yard units within New Angel's Yards (Block E and C). These are proposed in Phase 7 providing 793sqm of employment floorspace. As a result of the proposed redevelopment of the estate, the proposal to increase the amount of ground floor workspace (Use Class E(g)) is welcomed.
- 11.35. The site currently includes 600sqm of existing temporary workspace use within converted garages (Angels Yard). This project was funded by the GLA via the Good Growth Fund. The proposed phasing strategy delivers dedicated workspace prior to the demolition of the Angel Yard site at Snell's Park. This would allow these businesses to move directly into new premises, should they choose to do so. The proposed phasing would allow continuity of commercial workspace within the Site, with Phase 7 (New Angel's Yard) constructed prior to the redevelopment of the existing Angel's Yards. This is supported and responds positively to the land use and economic regeneration objectives set out in the Council's draft site allocation.
- 11.36. It is envisaged that this northern part of the scheme (Block E and C), located parallel to the high street, will attract a diverse mix of employment uses and visitors, via enhanced pedestrian linkages and provide opportunities for people to work, meet and socialise. The location of this worker space is directly parallel to Fore Street and the Angel Edmonton District Town Centre, with the potential to increase footfall and future use of the existing/future shops and businesses, thus making a positive contribution to the overall vitality and viability of the High Street and District Centre.
- 11.37. A proportion of the proposed workspace (10%) will be affordable and let out at sub-market rent levels (25% below market rates) and on flexible terms to facilitate easy 'in and out' of local businesses / organisations. This is secured via the shadow s106.
- 11.38. Overall, the provision and phasing of workspace is supported and responds positively to the land use and economic regeneration objectives set out in the Council's draft site allocation.

Social Infrastructure / Community Uses

- 11.39. *Community Infrastructure:* Currently, the Site includes 824 sqm (GIA) of community floorspace. This is made up of Fore Street Library (495sqm) and Boundary Hall (329sqm). The Masterplan proposes a new Civic Hub in Block G set in the centre of the scheme, fronting Fore Street adjacent to a new public square.
- 11.40. The Masterplan includes up to 2,735 sqm (GIA) of community and civic floorspace (Use Classes F1 and F2), split between the Detailed Element where there will be 103sqm in Block D. The remaining floorspace is within the Outline

Element and provided through the provision of a new Civic Hub on the high street forming Block G.

- 11.41. The Civic Hub (brought forward in Phase 7) is proposed to include, a gallery/museum/rehearsal space (all flexible floorplates), a re-provided library/Good Growth Living Room, community halls, public square for markets and/or performance, informal workspace and a small-scale food and beverage unit on the main frontage and space to be used by the Metropolitan Police.
- 11.42. In terms of phasing, the construction of Block G is proposed prior to the demolition of the existing library located on Fore Street. Therefore, this would ensure continuity of provision and no temporary loss of existing community facilities in the phasing of the development. A continuity strategy for the community facilities and business plan would be secured via the shadow s106 agreement.
- 11.43. *Replacement of Boundary Hall:* The existing Boundary Hall (329sqm) would be demolished in the detailed element (Phase 2) of the scheme. There would be a community space constructed prior to this in Phase 1 Block D (103 sqm).
- 11.44. However, to compensate for a potential temporary deficit in the quantum of community floorspace at this point in the phasing, the applicant has committed to bringing forward a temporary community building (362sqm) in the interim, as part of their meanwhile use strategy. This proposed community space would be (as indicated on the parameter plans) located to the north of Block N, adjacent to Angels Yard, until the permanent reprovision in Block G is brought forward in Phase 7.
- 11.45. The temporary community centre is to be provided prior to the demolition of existing Boundary Hall. This temporary community space would be secured via a Grampian condition, requiring the submission of an early Reserved Matters Application on the detailed design (appearance) and obligations via the s106 to ensure continuity of the community facilities and there would be no net loss, permanently or in the interim. The meanwhile strategy to provide a temporary community hall for the loss of Boundary Hall is therefore appropriately reprovided and is considered acceptable.
- 11.46. *Nursery:* A new nursery would be in Block Q (Outline, Phase 4). Within the Masterplan this would adjacent to the civic hub, primary school and multi-use games area. The proposed nursery's floorspace has been sized (minimum 225sqm) to meet the expected child yield generated, based on the Environmental Statement, by the proposed development. The proposed nursery would be provided in Phase 4, where there is expected to be additional need for nursery spaces which is considered acceptable in this instance.
- 11.47. In relation to the nursery provision, recommended conditions require the nursery to be delivered in Phase 4. The ES identifies that nursery capacity is likely to be exceeded prior to this point. However, this is the earliest the nursery can be provided to address the demand given the constraints of the existing buildings and this provision is considered appropriate mitigation.

Summary of Social Infrastructure

- 11.48. The proposals to improve social infrastructure on the Site would represent a significant qualitative and quantitative increase compared to the existing

situation and floorspace. The accessibility and prominence of the new civic hub is supported and would accord with the principles set out in London Plan Policy S1.

- 11.49. The overall approach to social infrastructure is strongly supported and would ensure the delivery of modern, enhanced, multi-functional and accessible social infrastructure facilities with no net loss in terms of the existing provision. The proposals are therefore in accordance with London Plan Policy S1.

Open Space

- 11.50. The Site contains several existing public open spaces which are designated as locally designated local open space in the adopted Enfield Local Plan proposals map as well as other areas of soft landscaping to the housing blocks. There is also an existing Multi-use Games Area (MUGA) in the centre of the Site. The table below sets out the existing and proposed open/play space:

Type	Existing sqm	Proposed sqm
Open Space - Parkland	10,798 (designated POS)	20,930
MUGA	1,010	1,185
Soft Landscaping	18,501	5,800
Civic Space (hard landscape)	-	2,420
Total	30,309	30,335

Table: Existing and proposed open space provision (sqm.)

- 11.51. Currently many of the public open spaces and amenity lawns are of a generally low environmental and design quality. This is due to a variety of issues including dominant visual impact of car parking and hard standing; the layout and design of blocks, garages, fencing and walls which restricts movement and limits visual and physical permeability through these open spaces; and a lack of natural surveillance.
- 11.52. The masterplan layout carefully balances the placement of blocks and consolidated green space. Two new large public open spaces are proposed, as part of a cohesive and integrated landscape linked by a new ecological route running north-south through the centre of the Site. The open space also includes a new school square, a replacement MUGA, a public square to Fore Street, smaller pocket parks and tree lined streets.
- 11.53. Whilst the Site is in an area of open space deficiency, the masterplan would result in a significant qualitative as well as provide a small quantitative improvement in open space provision on a constrained site, seeking to balance a number of planning considerations.
- 11.54. The proposed development provides landscaped open spaces that are accessible to the public including improved community access to the MUGA. As such, in land use terms, the proposed development is acceptable in principle and is consistent with the aims and objectives of the NPPF as well as London Plan Policies GG2, GG4, S1 and H1.

Summary of Principle of Land Use

- 11.55. The Site constitutes previously developed land and therefore the principle of developing the Site for housing to support the Borough's housing delivery target is supported. The proposal is aligned with making the best use of land and building to suitable densities on well-connected sites.
- 11.56. The development will be residential led, given the need to re-provide the existing housing on site. The proposals accord with the draft planning policy allocation and the strategic objectives for estate regeneration and will provide an intensification of the established residential (Use Class C3) use on previously developed land that has been identified for additional housing growth and regeneration. Accordingly, the principle of residential led development on this Site is fully supported.
- 11.57. The range of non-residential uses proposed are acceptable in this location as part of the overall plans to re-develop and re-generate the estate and contribute to the wider economic, social, and environmental sustainability of the area, making a valuable contribution to the overall sustainability and vitality of the District Centre. The new and re-provided community facilities will also provide activity and a new civic heart to the place and the new workspace will provide economic opportunities for local business, whilst ensuring no temporary or permanent loss, during the phased construction.
- 11.58. Accordingly, considering the above policy considerations, the development proposals represent appropriate land use/future uses in the overall redevelopment and regeneration of the estate and amount to public benefits in support of the proposal.

12. Housing and Affordable Housing

- 12.1. The NPPF is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions ensure that developments make optimal use of the potential of each site. In these circumstances...”c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF”. The NPPF also sets out the national objective of significantly boosting the supply of homes.
- 12.2. The London Plan also acknowledges the extent of the housing crisis in London. The population is projected to increase by 70,000 a year, reaching 10.8 million by 2041. This means that just to meet demand, tens of thousands of new homes need to be built every year. Policy H1 of the London Plan seeks to increase the supply of housing in London and optimise the potential for housing delivery on all suitable and available brownfield Sites including those with good public transport accessibility. Policy H1 seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating). Policy H1 also highlights the urgency to optimise housing provision on brownfield sites, specifically identifying opportunity for housing intensification and development on publicly owned sites.
- 12.3. The London Plan provides a ten-year housing target for each of the London Boroughs. The 10-year target for Enfield is 12,460 homes over the period 2019/20 to 2028/29. This identifies a need for a minimum of 1,246 dwellings per

year to be delivered over the next 10 years in the Borough, an increase over the previous target of 798.

- 12.4. Enfield's Housing Delivery Test Action Plan 2023 found that in the period 2019/20 to 2021/2022, the Council met 73% of its housing target delivering 995 homes in 2021/22. This is an improvement on the previous year (847 completions) despite challenging market conditions. However, as delivery across three years is 73% of the Government's requirement, the Council is placed in the 'presumption' category. This requires the Council to prepare a Housing Delivery Action Plan and add a 20% buffer to the Council's 5-year housing land supply which is monitored through the AMR.
- 12.5. Enfield has close to 40% of land currently designated as Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south-east growth corridors. These land designations underpin the need to optimise development on brownfield land.
- 12.6. The New Enfield Local Plan (ELP) was published at Regulation 19 Stage between 28 March and 28 May 2024, and acknowledges the scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough and to continue to delivery housing growth to 2041.
- 12.7. The emerging Local Plan identifies that the application site falls within the Angel Edmonton Urban Placemaking Area, led by draft Strategic Policy SP PL4. The draft policy sets out the aspirations for the area, including the potential for introducing a range of housing typologies; denser forms of development / residential growth and achieving a thriving, mixed use place. Additional objectives include improved connectivity, healthy streets, and new / enhanced open space as well as habitats mitigation.
- 12.8. The Site forms the majority of draft Site Allocation SA15 in the draft Local Plan. This references the provision of 1,217 net homes on site which reflects the delivery trajectory set out in the SHLAA and is based on the number of homes predicted to come forward during remaining 17-year period of the draft plan (2024 – 2041). The New Enfield Local Plan supports the principle of increased residential provision along with commercial and community uses and associated social infrastructure. Although of limited in weight, it sets out the trajectory of policy for this area and site specifically.
- 12.9. As summarised in the table below, the proposed development will provide up to 2,028 new homes overall, considerably increasing the existing number of 795 homes. In this context it is also important to understand that high density housing does not necessarily equate to overcrowding. Along with many other London Boroughs, LB Enfield faces an acute shortage of affordable housing, contributing to homes with more people living in them. Overcrowding can occur in private rented or Council homes where households cannot afford or find available, homes large enough to meet their needs. The new housing proposed by this scheme, and particularly the social rent homes and the landlord offer, will help ease this critical shortage, by better matching homes to the right household size and freeing up existing accommodation, as discussed below.
- 12.10. Taking into account the housing needs of Enfield's population, nationally and regionally set housing delivery targets and shortfalls in meeting targets, the proposal to re-develop the existing estate is, in principle supported. The

proposal would make more effective use of Council owned land to provide a greater number of better-quality homes, with a range of relevant housing types/tenures to meet an identified need as set out in planning policy and is, therefore strongly supported.

Affordable Housing

- 12.11. Policy H4 Part A of the London Plan (LP) (2021) sets the strategic target for 50% of all new homes delivered across London to be genuinely affordable. This sets out specific measures to achieve this strategic aim which include requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach set out in Policy H5 of the London Plan, and then using grant to increase affordable housing delivery beyond the level that would otherwise be provided.
- 12.12. Emerging Local Draft Policy H2 identifies that the requirement for affordable housing on eligible sites (those comprising ten or more new homes or have a combined gross floorspace greater than 1,000sqm) is 50% where the site is owned by the Council and is an estate regeneration scheme.
- 12.13. LP Policy H4 requires 50% of all new homes to be genuinely affordable. The specific measures further require all affordable housing providers with agreements with the Mayor to deliver at least 50% affordable housing across their development programme, and 60% in the case of strategic partners; and require developments on public sector land to deliver 50% affordable housing on each site. Public sector landowners with agreements with the Mayor to follow the London Plan's portfolio approach are required to deliver at least 50% affordable housing across their portfolio of sites. Part B of Policy H4 of the London Plan requires affordable housing to be provided on site.
- 12.14. LP Policy H8 details the Mayor of London's position on the loss of existing housing and estate redevelopment. Part A sets out that the loss of existing housing should be replaced by new housing at the existing or a higher density, with at least the equivalent amount of housing floorspace re-provided.
- 12.15. Core Policy 3 of the Core Strategy (2010) sets a borough-wide affordable housing target of 40% in new developments, applicable on sites capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances.
- 12.16. Policy H2 of the New Enfield Local Plan (ELP), whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on development sites and that the Council will set a strategic target of 50% of new housing to be affordable.
- 12.17. The Site forms an important part of the Council's Housing Renewal Programme portfolio and is one of several key sites identified by the Council to address the acute need for new social housing in the Borough. The Applicant's objectives are to re-provide the number of affordable homes which require re-provision, and to maximise the number of much-needed affordable homes that can be delivered on the Site through making efficient use of underutilised land, whilst sensitively addressing the various site constraints and challenges on the estates and ensuring a viable and deliverable scheme.

	Tenure	Units	Habitable Rooms	Floorspace (sqm)
Existing	Social Rent	434	1,249	28,383
	SO, SE	0	0	0
	Private	361	1,151	25,301
	TOTAL	795	2,400	53,684
Proposed	Social Rent	625	2,110	Max. 102,929
	SO, SE	388	1,147	
	Private	1,015	2,825	Max. 97,416
	TOTAL	2,028	6,082	200,345
Uplift	TOTAL	1,233	3,682	145,199

Note – proposed housing figures based on detailed element and indicative masterplan for outline

- 12.18. Of the overall provision of up to 2,028 new homes proposed, 1,013 homes are proposed to be affordable. 625 homes will be for social rent and 263 shared ownership, and 125 offered for shared equity (in the case of re-housing resident homeowners) to reflect the need to provide replacement housing for existing tenants as well as responding to the requirements of the Council's housing waiting list.
- 12.19. The London Plan requires that the percentage of affordable housing on a scheme is calculated in habitable rooms, in the first instance to ensure that a range of unit sizes is provided. The applicant's Affordable Housing Statement outlines that the proposed scheme's affordable housing provision when measured on a habitable room basis reflects 53% in terms of habitable rooms and 49% by unit.
- 12.20. The delivery based on habitable rooms exceeds the requirement of 50% gross development for estate regeneration schemes in the London Plan and therefore is in accordance with policy and supported. This has been supported by a viability statement which demonstrates this is the maximum the scheme can offer.
- 12.21. Overall, the proposed affordable housing represents a net increase of 579 affordable homes across the Site. In this case, Enfield Council is prioritising the delivery of low-cost rented homes to re-house existing residents in response to the most up to date identified need set out in the LHNA (2020) as well as the requirement to address the acute needs of the Council's housing waiting list. As such, a significant proportion is to be allocated in the form of social rent and the mix of proposed social rent uplift homes and shared ownership homes within the Detailed Element reflects the unit size priorities set out in the LHNA 2020 and reflected in Draft Policy H3 of the ELP.
- 12.22. London Plan Policy H8 sets out key policy requirements for the loss of existing housing and estate regeneration, requiring the loss of existing housing to be replaced by new housing at existing or higher densities with at least equivalent level of overall floorspace.
- 12.23. As set out earlier, the proposed development will result in a net increase in affordable housing on the Site and include the introduction of new affordable tenures in the form of shared equity and shared ownership homes. Overall, there will be an additional 579 affordable homes (net) and 2,008 additional habitable rooms (net), that will be delivered across the Site.

12.24. The Detailed Element of the proposal will deliver 575 homes (Phases 0-3) of which 526 homes will be affordable (91%) to enable re-housing of existing tenants and respond to identified local need. The composition of the homes is as follows, including the proportion of replacement homes within Phases 0-3. The remainder of the replacement homes will be provided in outline element phases 4 and 5.

Housing Tenure and Mix - Detailed Element (Units)								
Tenure	1 bed	2 bed	3 bed	4 bed	5 bed	Total	%	
Social Rent	133	113	134	11	2	393	68%	
Shared Equity	16	29	28	0	2	75	13%	
Shared Ownership	19	39	0	0	0	58	10%	
Private	25	14	10	0	0	49	9%	
Total	193	195	172	11	1	575	100%	
%	34%	34%	30%	2%	0%	100%		
Total in Detailed Phases (0-3) 575 units								

Table: Proposed Tenure Mix – Detailed Phases

12.25. This will support the Council’s key objective of the re-housing strategy by limiting disruption to existing residents by moving them into their new home as quickly as possible. It also demonstrates the priority for delivering a higher proportion of replacement affordable homes within the early phases and is supported.

12.26. The proposed scheme provides 53% affordable housing overall, above the strategic target established by Policy which has been achieved, with the use of grant from the Mayor of London. The proposed scheme’s affordable housing provision is therefore consistent with the affordable housing objective set in the London Plan and is in line with the Mayor’s Good Guide to Estate Regeneration (2018) which requires an uplift in the amount of affordable housing by unit, habitable room and floorspace and is strongly supported.

Phasing and Decant of Existing Residents

12.27. The Proposed Development is intended to be brought forward in 11 Phases. Phases 0-3 comprise the Detailed Element. Phases 4-10 are within the Outline Element. The total number of existing homes on site is 795. 434 homes are affordable units and 361 private. The Council currently owns and manages the majority of the affordable housing on site. 44 homes are managed by several Housing associations. 153 homes are resident lease/freeholders. This totals 587 households eligible for re-provision (decant) based on the Landlord Offer.

12.28. This sets set out that anyone living on the estates in a secure social tenancy (434 households) would be re-homed on-site in a new social rented home, and existing resident leaseholder/freeholders (153 households) would be re-homed on-site in a new shared equity home. In relation to the non-residential leaseholder/freeholder households on the estate (208 households), these are not eligible to be re-provided by the Council unlike the existing social rent and resident leasehold/freehold homes. Therefore, these homes are being bought back by the Council and will be re-sold as market tenure homes.

12.29. The Council has undertaken an assessment of housing need with particular focus on those households affected by the detailed phases to identify the extent of any under and over-occupation, which has informed the unit mix. This process

has helped broadly identify the number of households who require the same sized home as currently, those who may be willing to downsize and those who are over-occupying and a require a larger home to meet their needs. This situation will be subject to ongoing review by the Council to capture any changing requirements and those households who request to be rehoused off-site elsewhere in the borough, in accordance with the provisions of the Landlord Offer. The proposed Social Rent unit mix for the detailed application is based in-part on certain assumptions given the dynamic situation at this stage in the process but has been tested against current understanding of housing needs of existing residents.

- 12.30. Council tenants will be offered an alternative home on a social rent with no less security of tenure than they currently have. Rent levels will align with the Council's social rent levels for the Borough depending on the size of the home which tenants choose to move into. Home loss and disturbance payments will be made to tenants to compensate for the move. In addition, the unit mix for the additional Social Rent homes being provided beyond those required to address decant requirements is driven by the need to address local housing need in the borough set out in the LHNA, which is reflected in the Draft Enfield Local Plan. This identifies a high priority for two and three-bed Social Rent homes and a medium priority for one-bed units.
- 12.31. The proposed social unit mix (in the detailed phases) reflects a reduction in two-bed units and a notable increase in three+ beds, which reflects both a combination of existing households seeking to downsize and those with overcrowding requirements coupled with a priority to provide a higher proportion of family-sized Social Rent homes to meet identified borough-wide need as dictated by policy. Given the relatively even distribution of unit sizes, there is flexibility to address changing requirements of existing households during the delivery of the detailed phases.

Tenure - Existing	1-Bed	2-Bed	3+ Bed	Total
Social Rent	155	230	49	434
	36%	53%	11%	
Tenure – Proposed (Detailed)	1-Bed	2-Bed	3+ Bed	Total
Social Rent	133	113	147	393
	34%	29%	37%	

Table: existing and proposed social rent homes (in detailed phases)

- 12.32. In addition, there are 116 social rent units in the detailed phases that will be demolished. 393 social rent homes will be reprovided, providing a high degree of choice. The remaining decant and additional Social Rent homes will be provided in later phases. Given this forms part of the outline application, the unit mix is illustrative at this stage and will be defined at Reserved Matters stage with reference to identified housing needs at that point in time.
- 12.33. 153 homes are resident lease/freeholders. 125 shared equity units are proposed in the application. It is assumed, not all residents will wish to remain on the estate and the proposed unit mix has been developed specifically to meet the needs of existing owner occupiers on-site who have expressed a desire to remain living on the Site. Any of these shared equity homes not to be taken up by existing residents would be provided as Shared Ownership, ensuring these remain as affordable tenure.

- 12.34. Phase 0, the first phase (Block A) is located on part of the estate which does not comprise any buildings. This would enable 50 homes and allow residents to move directly into new accommodation prior to the first block being demolished (Wadham House). Block D would then be constructed to enable the affected residents to be rehoused first prior to demolition.
- 12.35. In the initial phases (Phases 0-3, the detailed element), 245 existing homes (116 affordable) will be demolished. By completion of the detailed element (Phases 0-3), there will be 526 affordable homes (393 social rented homes).

Detailed Phases	Total Homes	Affordable Homes	
		By Unit	% of Total Homes
Phase 0	50	50	100%
Phase 1	220	220	100%
Phase 2	148	99	67%
Phase 3	157	157	100%
Total	575	526	91%

Table: affordable homes in detailed phases

- 12.36. Phases 4 and 5, will include the delivery of the remaining eligible replacement (decant) homes following the Detailed Element (Phases 0-3). The remaining 550 existing homes will be demolished in the later phases (Phases 4-10, the outline element).

Outline Phases	Total Homes	Affordable Homes	
		By Unit	% of Total Homes
Phase 4*	167	167	100%
Phase 5*	279	108	39%
Phase 6	287	35	12%
Phase 7	245	144	59%
Phase 8	115	33	29%
Phase 9	134	0	0%
Phase 10	226	0	0%
Total	1,435	487	34%

*Table: Indicative Affordable Homes in outline phases
expected decant of remaining eligible residents

- 12.37. For Detailed Phases the development runs off a sequence of decant existing, demolition and then construction of new homes. An accelerated construction programme has been adopted from Phase 4 onwards whereby some decant momentum has been achieved and groups of new blocks can be built simultaneously.
- 12.38. Decant of existing residents continues to the end of Phase 5. The demolition of existing buildings continues to Phase 8. Phases 9-10 are enabling and then construction. Whilst the earlier phases deliver predominately affordable homes, the remainder of the later phases will also provide new social rent, shared ownership and market sale homes, to help establish a mixed and balanced community.
- 12.39. It is acknowledged, the housing strategy requires flexibility to allow the proposed housing tenure and mix to respond to the needs of the households who wish to

stay on the estate. As a result, the proposed housing tenure and mix in the Outline Element (Phases 4-10) will be reviewed with further housing needs surveys to be completed throughout the delivery of the Proposed Development, which will inform the detailed proposals to be submitted at the reserved matters stages for the Outline Element. To ensure the affordable housing levels do not fall below those existing on site and a minimum provision of affordable housing is secured, clauses are recommended as part of the s106.

- 12.40. All existing homes on the Site will be re-provided in the Proposed Development. All secure tenants and resident homeowners will have the 'right to remain' on the Site and will be offered a new home. A key objective of the Council's rehousing strategy is to limit disruption to existing occupants as much as possible. The strategy for replacement homes will also enable all existing residents to only have to move to a new house once i.e. from their existing home and into their new home on the estate, should they choose to do so. If existing social rent tenants decide to move away from the Site, they will be given priority status in the Council's letting scheme to bid on other Council-owned homes in the Borough. They will remain entitled to a new home on the Site up until the point they move out.
- 12.41. Having reviewed the indicative phasing and decant strategy, officers are satisfied that that the detailed and outline phases would ensure the decant requirements are met, in line with the Landlord Offer and would help facilitate the rehousing of residents with a single move. This is supported, in accordance with the Mayor's Good Practice Guide to Estate Regeneration.

Housing Tenure

- 12.42. Policy H6 sets out that the following split of affordable products should be applied to residential development. The Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision (Core Policy 3 and DMD Policy 1).
- 12.43. Emerging Local Draft Policy H2 sets out that 50% of affordable housing should be for social/affordable rented housing and 50% should be provided as intermediate affordable housing products including Shared Equity and Shared Ownership.
- 12.44. The hybrid application proposes up to 2,028 residential homes, of which, a total of 1,013 homes would be affordable. These would consist of 625 would be social rent, 263 shared ownership, 125 shared equity (and 1,015 private homes based on the detailed and indicative outline housing mix).
- 12.45. This would represent a tenure mix of 62% for social rent with the remaining 38% offered for shared ownership or shared equity (in the case of rehousing resident homeowners) across the masterplan. In the detailed phases 75% would be social rent and 25% intermediate. The scheme is designed as tenure blind, in terms of external specifications, and all occupiers would have the same access to communal facilities.
- 12.46. The tenure split is not wholly compliant with the London Plan. However, this is due to the need to rehouse existing tenants, based on the Council's Landlord Offer and identified need for low-cost housing. Broadly, the tenure mix complies with the above policy and as such the proposal is considered acceptable in this regard and in accordance with H6 of the London Plan.

Housing Mix

- 12.47. London Plan Policy H10 sets out that all residential development should generally consist of a range of unit sizes, which should be based on, amongst other things, local evidence of need. Regarding low-cost rented homes, Policy H10 states Boroughs should provide guidance on the size of units required by new development to ensure affordable housing meets identified needs. This should take account of evidence of local housing needs, including the local housing register and the cost of delivering larger units and the availability of grant.
- 12.48. Core Policy 5 of the Core Strategy seeks to provide a mix of housing borough wide. The evidence bases to support the unit mix set out in Core Policy 5 dates from 2008. The preferred housing mix in the Core Strategy (based upon local housing need information and market signals) has been updated through the Local Housing Need Assessment 2020 (LHNA), which has been prepared as part of the evidence base to support the preparation of the ELP. This has identified a shifting priority for housing mix that more accurately reflects the needs of the Council's housing waiting list and is an important material planning consideration in context of providing a more up-to-date empirical position.
- 12.49. Draft Local Plan Policy H3, outlines priority types for different sized units across different tenures.
- 12.50. The Detailed Element of the application provides a fixed quantum and mix of homes. The Outline Element provides for a maximum quantum of floorspace defined by parameters set out in the Development Specification. It is expected that the Proposed Development will take approximately 23 years to build out. A degree of flexibility is needed to allow the proposed housing tenure and mix to respond to changing needs over this period. The illustrative proposals for the Outline Element reflect an indicative mix of homes up to the maximum amount of floorspace proposed, which could inductively deliver up to 1,453 homes. Combined with the fixed number and mix of homes in the Detailed element, the masterplan indicative mix is shown as:

Tenure	1-bed	2-bed	3-bed	4-bed	5- bed	Total	%
Social Rent	199	219	189	16	2	625	31%
Shared Equity	29	60	33	1	2	125	6%
Shared Ownership	105	138	20	0	0	263	13%
Market Sale	475	417	114	9	0	1,015	50%
Total	808	834	356	26	4	2,028	100%
%	40%	41%	18%	1%	0%	100%	

- 12.51. The proposed housing mix by tenure has been shaped by characteristics of the scheme as an estate regeneration project and decant and rehousing requirements. All existing social rent households who are remaining on the estate would be provided with a home to meet their occupancy requirements, plus one bedroom, which is welcomed.
- 12.52. In total, 386 family sized homes would be provided. This equates to 19% overall. More than half of the family housing provision is in social rent tenure where there

is a strong identified need. The minimum percentage (19%) of family homes is secured via the Shadow s106.

- 12.53. Although the overall housing mix is inconsistent with the balance of dwelling types sought by CP5, the proposal would fulfil the aims of LP Policy H10 by providing well-designed one- and two- bedroom units in a suitable location. This would provide opportunities for those in the Borough looking to downsize, enabling larger dwellings elsewhere to become available for new occupiers. In addition, one-bedroom units play an important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes.
- 12.54. In this context, and in view of the significant undersupply of housing against the 5-year housing target and the shortage of new affordable housing and housing in general in the Borough ('titled balance'), only limited weight is given to Policy CP5 in this instance. The proposed dwelling type provision is considered to align with the SHMA, which identifies a need for all housing sizes, including 1 and 2 beds.
- 12.55. Whilst there remains a substantial need for 3 bed + the ability to deliver this needs to be informed by particular site considerations, including viability. The proposal would contribute towards identified housing needs of the LHNA. The scheme optimises family units at lower levels, with 3 bed units provided generally in the lower scale buildings, which have direct access to gardens and are more accessible.
- 12.56. Importantly, the mix has been informed by the scheme's overall viability. A Market Report has been submitted (JLL). At present the scheme is in deficit. To support a larger quantity of these types of units would likely negatively impact overall viability of the development. It is also noted that any consent would be subject to the inclusion of viability review clauses and any additional profits would need to be fed back into the delivery of additional affordable housing should this become viable.
- 12.57. The proposal would increase the number of larger 3-bed social rented units (net increase across the masterplan of 158) of which there is significant need. This is given weight in the assessment of the application. In addition, the proposal would still accord with the requirements of policy CP5 in continuing to offer housing types with a mix of 1, 2 and 3 beds that would meet identified housing needs. Overall, there is a need for all unit sizes and the scheme provides an appropriate housing mix in this instance.
- 12.58. Section 38(5) of the Planning and Compulsory Purchase Act 2004 sets out where policies of development plan conflict with each other, the conflict must be resolved in favour of the policy that is contained in the last document to become part of the development plan. In this case, whilst the proposal is inconsistent with Policy CP5 of the Core Strategy, Policy H10 therefore takes precedence in the determination.
- 12.59. Accordingly, the overall proposal would continue to offer a range of house types that take account of housing requirements in the borough. The proposal would also meet policy DMD 3 of the Enfield Development Management Document 2014 which seeks the provision of a mix of homes. These policies are also consistent with the NPPF. Therefore, the proposal is consistent with the

development plan in terms of its delivery of the appropriate mix of dwellings on the Site.

Viability

- 12.60. Policy H8 of the LP states development proposals that include the demolition and replacement of affordable housing are required to follow the 'Viability Tested Route'. Estate regenerations schemes should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.
- 12.61. In support of their application, the applicant provided a financial viability assessment (dated November 2022) produced by the applicant's viability consultant DS2 with addendums, the latest of which is dated 30th April 2024.
- 12.62. The Council appointed an external assessor (BPS) to review the applicant's viability assessment. BPS provided a full response to the latest proposals on 27th March 2024, updated by an addendum on 08/04/2024 (the BPS Review), which reflects the maximum number of units of residential homes 2,028, of which, 625 would be social rent, 263 shared ownership, 125 shared equity and 1,015 private homes based on the detailed and indicative outline housing mix. The proposed affordable and shared equity housing represents 53% of the total housing by habitable room (49% by unit).
- 12.63. It is important the scheme has a reasonable prospect of being delivered, and the workings of both the applicants and Council advisors indicates that the viability position is challenging. BPS have assessed the cost and value inputs within the financial appraisal in order to determine whether the scheme can viably make the maximum affordable housing provision. The BPS Review, notes that the applicant's offer is contingent on receipt of grant identified within the scheme appraisal as totalling £54.4 million in the Detailed Phases.
- 12.64. The NPPG advises, to define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. Viability assessments should be undertaken using benchmark land value.
- 12.65. The approach to Benchmark Land Value, of Existing Use Value+ is largely agreed between the parties. Whilst BPS conclude a significantly different Benchmark Land Value (BLV) of £11.4m compared to the applicant's £112.13m, this is due to the buyback costs being excluded from the BLV and being reflected accurately in the cashflow at the actual cost levels incurred. As the applicant has agreed that buybacks should be included as an actual cost within the cashflow, rather than form part of the BLV for review purposes, this element is largely agreed but requires resolution for the s106 drafting process.
- 12.66. The Council's viability consultants have advised that given the nature of the proposals and delivery of wider regeneration as part of the long-term development programme, that viability should be monitored and reviewed at regular intervals and on an open book basis, to allow all variables to be considered and fully assessed over the duration of the development. It is recommended that agreement is secured on the appropriate approach to target Internal Rate of Return and Benchmark Land Value (in order that compensation and buyback costs can be reflected accurately and appropriately at review) to provide clear parameters as part of these reviews.

- 12.67. As such a series of early, mid, and late-stage reviews on an open book basis are proposed, where all possible variables can be assessed in real time in the cashflow in the appropriate way. In terms of the mid-term review mechanisms, these should be applied to RMAs, following the detailed phase. Open book reviews of the scheme are recommended to be secured as part of the terms of the shadow s106 agreement. If viability of the scheme improves overtime, these obligations would enable additional affordable housing provision across the Site.
- 12.68. Appraisals undertaken by BPS show the scheme produces a positive Internal Rate of Return of +5.58% assuming an annual regeneration benefit of 2.5% and a BLV of £11,448,450. This leaves the scheme in a deficit. Therefore, the scheme is not currently able to contribute towards or provide any additional affordable housing, above that currently stated.
- 12.69. Sensitivity analysis has been undertaken to test the impact of changes to costs and revenues (Appendix Three of the 27th March 2024 BPS review). This shows that the deficit is eroded assuming a 10% rise in revenues and 5% fall in build costs, or alternatively a 5% rise in revenues and 10% fall in build costs.
- 12.70. In summary, the submitted viability appraisal indicates that the proposed scheme would be in deficit. Nonetheless, overall, it is proposed to provide 53% affordable housing (based on hab. room) across the whole scheme with over half (625) of the overall affordable housing units (1,013) to be provided at social rent. In the detailed phases (0-3) 91% of the housing would be affordable.
- 12.71. Overall, the proposed level and mix of affordable housing is the maximum reasonable amount of affordable housing that could currently be delivered at the site and is considered acceptable, subject to a s106 clause to secure early stage, mid stage and late-stage reviews.

Housing Summary

- 12.72. The Government prescribes a 'tilted balance' in favour of housing delivery to the Council's planning decision-making as a result of Enfield's shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. Development on Council land and the overall benefits of the regeneration of the estates presents a significant opportunity to provide much needed housing.
- 12.73. The proposed affordable housing provides 53% of the total housing proposed by habitable room (49% by unit). The tenure split would be broadly compliant. Given the evidenced need for new housing, the requirement to re-house existing tenants on site, front load the delivery of affordable homes into the earlier phases and respond to identified local needs, it is considered that the collective benefits of the proposal, outweigh any divergence of the dwelling size/mix from the policy requirements set out within the Core Strategy and the Draft Local Plan. The scheme is considered in accordance with Development Plan policy and complies with the NPPF's objective of ensuring the effective use of land in meeting the need for homes.

- 12.74. Given the size and complexity of the scheme and demolition and construction timescales, phasing obligations are included in the shadow s106 agreement to ensure that the decant and reprovision requirements are clearly set out and secured in terms of the minimum replacement social rent provision by phase which are to be secured prior to occupation.

13. Design and Townscape

- 13.1. Section 12 of the NPPF sets out the Government's objectives for achieving well-designed places. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.
- 13.2. Reflective of Chapter 11 of the NPPF, and paragraph 119 in particular, LP Policy GG2 says that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must, in summary, enable the development of brownfield land particularly on sites within and on the edge of town centres, as well as utilising small sites; prioritise sites which are well-connected by existing or planned public transport; promote higher density development in locations that are well-connected to jobs, services infrastructure and amenities by public transport, walking, and cycling; apply a design-led approach to determining the optimum development capacity of sites; and understand what is valued about particular places and use that as a catalyst for growth, renewal, and place-making.
- 13.3. London Plan policy D3 (Optimising site capacity through the design-led approach) seeks the optimisation of site capacity through the design-led approach. It says that all development must be designed to make the best use of land in a way that is contextually appropriate.
- 13.4. London Plan Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged. LP Policy D4 is geared to deliver high-quality design and place-making.
- 13.5. Local Plan Core Policy 30 and Local Plan Policy DMD Policy 37 sets out objectives for achieving good urban design: character; continuity and enclosure; quality of public realm; ease of movement; legibility; adaptability and durability; and diversity.
- 13.6. The application has been subject to extensive pre-application discussions between the applicants, the LPA, the GLA, TfL, London Borough of Haringey (given its proximity to the borough boundary) and other key stakeholders. The Masterplan has evolved since May 2019 through a series of pre application meetings including design based and other specialist topic workshops covering a wide range of inter-related disciplines.
- 13.7. The planning application has been subject to an independent design review process, led by the Enfield Place and Design Quality panel (DRP), which met on six occasions to discuss the proposals for the Site. Alongside these processes, engagement with the local community and existing residents has taken place and two revisions to the detailed element of the application to adapt to new regulations governing staircase provision in tall buildings.

Proposed Layout

- 13.8. The Masterplan sets out the proposed approach and strategy for both the Detailed Element (Phases 0-3) and the Outline Element (Phases 4+).



Image: Proposed Masterplan Layout (detailed and outline)

- 13.9. The design strategy for the Masterplan has emerged from a desire to create a series of clear and legible routes and connections. These prioritise pedestrians and cyclists at the top of the user hierarchy but also knit the estates back into their surrounding context. The improvement in permeability for active travel north south and east- west is welcomed and a key benefit of the scheme.
- 13.10. A range of blocks and building typologies would be provided across the Site, including perimeter courtyard blocks, mixed use blocks, linear and L-shaped blocks, terraces and tall buildings. The proposed block and building layouts are highly efficient.

- 13.11. The provision of perimeter courtyard blocks and linear and L-shaped blocks is supported. This would provide the opportunity to wrap the majority of car parking behind more active frontages with parking situated within podiums and communal courtyard gardens provided above. Front doors and clearly defined front boundaries are provided at ground floor level. This would help create a strong relationship with the public realm and provide clear definition between public and private space.
- 13.12. To the centre of the scheme, there is a strong relationship formed between the new civic hub, primary school and nursery and new school square proposed. Fronting onto Fore Street to the east would be another line of strong perimeter blocks. To the centre of the scheme park edges would be well-enclosed by the adjacent blocks with relatively consistent shoulder heights proposed to frame these two spaces with a home street to the west of the Site which successfully addresses the railway.
- 13.13. The Masterplan comprises two substantial landscaped public open spaces at the centre of the scheme – ‘the Meadows’ and ‘the Northern Grove’. These two spaces would be linked by a continuous green spine route running through the centre of the Site. This green spine would incorporate play space provision, walking and cycling routes alongside lawn, meadow, swale and wetland planting areas. A series of home zone streets, pocket parks, park streets and green links and yard routes are also proposed. This overarching landscape strategy provides an integrated network of landscaped green spaces.
- 13.14. The proposed Masterplan would help to transform what is currently a relatively incoherent and confusing estate layout into a clearer and more logical movement framework. This would be orientated around key pedestrian desire lines towards the high street, Silver Street Station, railway footbridge and key gateway to the south towards High Road Tottenham.
- 13.15. The proposed Masterplan is based on robust urban design principles and objectives in terms of creating a highly legible and permeable layout of streets and public squares centred on a strong landscape-led vision for the Site. The overall master planning approach is strongly supported and would respond positively to the site constraints and opportunities. A street-based approach with perimeter blocks creates a legible, human scaled proposal with a strong public front and secure private amenity. This can generally be seen to comply with LP2021 Policy D3.

Scale and Massing

- 13.16. The scheme proposes a transformative change, given that the scale and character of development is completely different from the existing estate. Variation in heights across the scheme would be provided with buildings ranging from 2 to 26-storeys. The edges of the Site are generally of a lower form, forming a contextual relationship with the existing built form.



Image: Building heights (storeys and meters)

- 13.17. The design includes towers marking key nodes in the development and the gateway to the Site. Within the masterplan, Blocks D & F and O & P would sit as pairs and form a 'primary network' of 19 and 26 storey towers alongside a 'secondary network' of taller buildings including 16, 17 and 18 storey buildings, discussed in further detail below.
- 13.18. Within the centre of the Site, the shoulder height of blocks adjacent to the park edge would be generally 8 to 10-storeys to create a sense of enclosure of this large linear public space. The "shoulder buildings" (Block K, N, J, L, B, H) are of an appropriate height given their park setting, with more open views to define the new open space. The height of these blocks is considered acceptable within the adopted and emerging context of the scheme. The massing of blocks facing the park edge would be varied with taller elements located on block corners to mark east-west public routes. These are predominantly one or two storeys above the general datum of an area, rising to three storeys above the datum in specific cases.
- 13.19. The general height along the northern section of Fore Street has been set at four storeys with a rise to five at the junction to College Gardens and a step down to one where meets Block E meets the public house along Fore Street. In

the southern part of Fore Street given the existing taller prevailing buildings, the height is proposed at eight storeys on the western side.

- 13.20. Block N will be the first block built fronting Fore Street and be part 6, part 8 storeys. It will re-introduce a sense of enclosure to the townscape and, in conjunction with later phases, will help to re-instate a consistent linear streetscape to Fore Street whilst also reconnecting it with High Road (within Haringey) which represents townscape improvement.
- 13.21. Around the general perimeter of the masterplan heights drop down to between three and five storeys to respond to their specific context such as existing terraced houses or heritage assets. The proposed blocks to the western, northern and eastern edges of the Site respond positively to the surrounding context and to the site's changing edge conditions and characteristics. To the northern part of Fore Street, the maximum heights are not overbearing on the high street (due to being set back from it) or an out of context jump in height from their surroundings.
- 13.22. Overall, the proposed scale and massing is a positive change, given the poor quality of the existing estate and its combination of open, unusable open space. Generally, the scheme proposes a new scale of development, with strategically placed taller buildings and other blocks more evenly spread across the Site stepping away from the high street and reinforcing the historic route of Fore Street (except for Block O and P).

Tall Buildings Assessment

- 13.23. *Policy Context:* Detailed and Outline consent is sought for a range of typologies which vary from 2-26 storeys in height. In terms of overall height, the proposed buildings as part of the hybrid scheme would consist of up to 26 storeys (Detailed, Phases 0-3) and up to 19 storeys (Outline, Phases 4-10). In the detailed phases this would comprise Blocks A, D, N and K. The majority of the buildings would constitute a tall building for the purposes of assessment.



Image: Axonometric of proposed height and massing (detailed blocks in purple)

- 13.24. Joyce and Snells Estate is indicated as a 'transformational area' in the Draft Enfield Local Plan (ELP). The site has been identified to support new housing through intensification and high-density development and as potentially an appropriate area for tall buildings, along with indicative maximum heights. The Draft ELP suggests appropriate locations for tall buildings, expressed on an area basis, by identifying tall buildings through existing typologies or those at appropriate transport nodes. The policy also seeks to set out the definition for tall buildings in various areas given the varied typology in the borough.
- 13.25. Those heights are suggested at 45m (14/15 storeys, max.) subject to criteria within the policy and other material considerations. These height parameters have been informed by the "Character of Growth" (CoG) study as part of the evidence base for the Emerging Plan.
- 13.26. In addition, the Draft ELP proposes an area-based policy in relation to the wider Angel Edmonton area, setting out the aspiration for the wider area. It is likely that any proposed tall buildings will need to be supported by a wider place-based analysis included within any emerging masterplan to justify how the location of tall buildings within the scheme takes into consideration the local plan evidence base. Limited weight is given to the Draft ELP, given its early stage in the adoption process, although it does represent a direction of travel for this Site.
- 13.27. DMD Policy 43 (Tall Buildings) is a criteria-based policy for considering tall buildings, which justifying text (para. 6.4.1) defines as those "that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor." It states that tall buildings will not be acceptable in areas classified as inappropriate which includes sites in the immediate vicinity of conservation area unless it can be demonstrated how the proposal avoids the negative impacts associated with the sensitive classification.
- 13.28. The London Plan (LP) is the most recent and up-to-date part of the development plan. The other design policies in the LP, mentioned above, are taken forward in Policy D9. First, the policy deals with the principle of 'Locations'. Boroughs should determine if there are locations where tall buildings may be an appropriate form of development and that any such locations and appropriate tall building heights should be identified on maps in Development Plans. Tall buildings should only be developed in locations that are identified as suitable in Development Plans.
- 13.29. Paragraph 3.9.3 of the LP states that "tall" is defined as buildings that are:
1. substantially taller than their surroundings and cause a significant change to the skyline;
 2. but that are not less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. The LP goes on to state that in the absence of a local definition, its policy applies to buildings in excess of this height.
- 13.30. The policy then goes on to deal with 'Impacts' and says that schemes should address firstly visual impacts notably the views of buildings from different distances. In long-range views, attention needs to be paid to the top of the building – it should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views. In mid-range views,

attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions, and materiality. In immediate views, attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character, and vitality of the street. Where the edges of the site are adjacent to (of relevance in this case) buildings of significantly lower height, there should be an appropriate transition in scale between the tall building and its surrounding context.

- 13.31. LP Policy D9 then sets out that whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan. Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. The buildings should positively contribute to the character of the area.
- 13.32. While the site is identified in the Emerging Draft Local Plan as an appropriate location for tall buildings (expressed on an area basis), the adopted Development Framework does not identify the Site for the placement of tall buildings (other than the location identified at Bridgeport House). The proposals therefore cannot meet the requirement (Part B) of the London Plan.
- 13.33. Based on recent case law, no wording indicates that Part A and/or Part B are gateways, or pre-conditions, to proposals for tall buildings being assessed under Part C (Impacts). Where a tall building/buildings does not comply with paragraph B(3), because it was not identified in the development plan, in accordance with the objectives of Policy D9, it is acknowledged, the proposal may be assessed by reference to the potential impacts which are listed in Part C of Policy DP in the London Plan. Discussed below are the 'Impacts' of the proposed tall buildings:

London Plan Policy D9 C. 1) Visual Impacts

a) The views of buildings from different distances

- 13.34. The TVIA, in conjunction with Volume Two of the ES and the ES Addendum (coordinated by Land Use Consultants) and Chapter 12: Historic Environment and the Heritage Assessment provides a thorough study of the current townscape condition of the Site and its context. It identifies the townscape and visual receptors potentially affected by the Proposed Development of the Site and provides assessments of the effects. The potential visual effects of the completed Proposed Development on 64 local and distant townscape (AVRs) from 52 viewpoints (with night-time and summer variations) were assessed.
- 13.35. Tall buildings are proposed in the detailed and outline elements of the scheme. Whilst a number of tall buildings are proposed within the outline element of the scheme, the applicant's TVIA includes fully rendered views. This shows the impact of the illustrative scheme, with taller elements in the outline application rendered. This is welcomed and has enabled officers to undertake a detailed assessment of the potential overall visual and cumulative impacts.
- 13.36. The detailed 26-storey tower (and 13 storey wing) are evident from several views in the TVIA. Block D is formed of red bricked work and has open corners with balconies, partnered with Block F with an asymmetrical emphasis. There

are views from the east and west where the stark nature of the change in scale and height are fully visible. These change the understanding of the place and create a change in the relationship along the railway line. However, this also draws attention to and improves legibility of the town centre by highlighting its location from other regeneration areas such as Meridian Water to the east and the Selby Centre to the West.

- 13.37. These proposed towers to the western side of the Site (Blocks D and F) would be seen alongside the existing towers present at Cannons Road, also noting the emerging context which includes a number of tall buildings permitted within the High Road West scheme. In conjunction with High Road West, the area is identified as an area of transformation and with a new character area created and landmark buildings as set out would likely project above the prevailing roofscape in any event. Brooke House is an extant element of High Road West with consented tall buildings further south. Blocks D and F are set against the western edge off the masterplan and would follow similar principles, in this regard, and follow this 'line' of tall buildings adjacent to the railway. In these views, the development as a whole and the taller buildings would be viewed as a continuum of taller elements which line the railway in these views with the heights generally stepped down towards more sensitive locations along Fore Street / High Road.
- 13.38. In terms of the outline element, whilst the southern end of the Site exhibits a degree of height currently, the proposed towers (Blocks O and P) would be apparent. As seen in the TVIA, Views 26-29, the towers would have a significant effect on the skyline, given existing long view, with only glimpses of Stella House. Block O would be the focus, in particular. This sudden change of height is considered to have some harm to the spacious and modest character of these areas. It is questioned whether to mark administrative boundaries in this way with built form of such great height is justified. The proposed buildings O and P would represent a substantial difference even in relation to the southern end of the Site.
- 13.39. The irregular hexagonal shape of the buildings O and P (southern gateway towers) are interesting and the building form slender. It is acknowledged that the location marks a change in direction of the road that creates a termination to views from the south, marks a transition from the High Road to Fore Street.
- 13.40. To visually break down the massing of these towers, the maximum parameters of the outline elements are drawn tightly to give a good indication of the buildings form and mass, along with rendered views. The chamfered and edged plan form and overall appearance proposed for the two southern gateway towers is supported. Alongside the proposed high-quality materials and detailing, this could ensure the provision of a distinctive pair of new towers marking views into the scheme from the south and looking south along the linear park. These indicate horizontal panels of terracotta coloured, high quality cast masonry, to, character and tone. Given the motif employed in their design and floorplan they would not appear to be slab blocks and articulation would be apparent in long views. Furthermore, the need to make the development viable and able to support the decant provision and uplift in affordable housing, height needs to be accommodated in some locations across the development. On balance the visual impacts are considered acceptable.
- 13.41. Within the Site the shoulder height of blocks adjacent to the park edge would be generally 8 to 10-storeys. This approach would create a sense of enclosure of this large linear public space. The massing of blocks facing to park edge would

be varied with taller elements located on block corners to mark east-west public routes. The width of the park allows the park frontage elevations to be taller proportionally and helps to enclose the space. The “shoulder buildings” (Block K, N, L, B, H) of an appropriate height given their park setting with more open views to define the new open space. The height of these blocks is considered acceptable within adopted and emerging context of the scheme.

- 13.42. In terms of cumulative effects, the TVIA identifies the majority of views would have a beneficial effect, when the proposed development is seen in conjunction with other cumulative developments. Seven effects were found to be neutral (Views 1, 2, 3, 4, 24, 37, and 41) and one negligible (View 49). In one case there will be no change (View 25) and in 21 cases there will be no cumulative effect.
- 13.43. Having carefully considered the proposals, including the submitted Environmental Statement (ES), Townscape and Visual Impact Assessment (TVIA) they demonstrate a general improvement in townscape terms from important views from the north and south and in the immediate vicinity of Fore Street. The linearity of Fore Street is reinforced by the removal of the existing blocks (which sit perpendicular to the route), and the visual impact of the taller buildings would be more reduced because of the overall massing strategy and the degree to which these buildings would be screened and shielded by existing and proposed new build blocks along the high street. The scheme would not affect any strategic views identified in the London Plan.
- 13.44. Where taller elements within the scheme would be visually prominent from the surrounding residential areas to the east and west of the Site, the TVIA demonstrates that these buildings would be viewed as attractively designed and visually prominent towers in the background context of existing views.
- 13.45. Officers consider that the Design Code submitted provides a suitable basis on which to develop RMAs for tall buildings in terms of advising on the approach to the base and top of tall buildings and the approach which should be followed in terms of articulation, detailing and detailed design and materiality. This includes matters relating to the functional design, layout, entrances, servicing, public realm and active frontages, in line with the Policy D9 criteria. Reserved Matters Applications should also be subject to further detailed environmental and townscape assessment and Design Review to ensure full compliance with London Plan Policy D9.

b) Spatial hierarchy of the local character and wider context and aid legibility

- 13.46. The design principle behind the towers in this case is a ‘primary network’ of 19 and 26 storey towers alongside a ‘secondary network’ of taller buildings including 16, 17 and 18 storey buildings, marking key nodes in the development and the gateway to the Site. Blocks D and F and O and P would sit as pairs, with differences in the towers heights and spacing between them to assist in legibility of the towers as a group in terms of height and massing with lower tall buildings located within the centre of the Site, enclosing key public spaces.
- 13.47. The proposed towers would be aligned with key east west route (Block D and F) and the southern routes (Block P and O). Block D (and F) is within the emergent tall buildings in the area and will function as a marker for Angel Edmonton, the crossing of the railway and the train station. Block D will be the tallest building within the masterplan and reinforce the emergent and existing spatial hierarchy, set away from heritage assets. Block D acts as a landmark standing above the

layers of development with clear lines over the bridge and from College Close. Heights are not overbearing, and tall buildings, notably in the outline element have the potential to be slender and elegant structures should the design intent be followed through. The applicant's height strategy assists with legibility, travelling to and within the Site, using taller buildings to mark important routes/uses. Taller buildings are in key locations across the scheme and mark key aspects rather than dominate the development.

- 13.48. The overall height and massing strategy is well considered and would ensure that taller buildings would contribute positively to the legibility of the area helping to sign-post key features of the movement network and reflecting pedestrian desire lines north-south and east-west. This includes reinforcing the legibility of the key gateway route into the Site from the west, as well as the legibility of the internal north-south green link, station access and the pedestrian footbridge over the railway. The impact because of the higher buildings is considered to be beneficial in offering landmarking to appropriate parts of the Site and its context generally.
- 13.49. Taller buildings would contribute positively to the legibility of the area helping to sign-post key features of the movement network and reflecting pedestrian desire lines north-south and east-west, notably links to the station access and the pedestrian footbridge over the railway. In relation to London Plan Policy D9, C, the buildings reinforce the spatial hierarchy of the context.

c) Architectural quality and materials

- 13.50. In the detailed element, the articulation of the façade of Block D in particular was subject to extensive reviews during the application process. Robust, durable and attractive facing materials comprising predominantly of brick are proposed with a varied palette of colours and tones for tall buildings within the detailed element Blocks A, D, N and K, (discussed in detail below). Good levels of detailing and depth are proposed within building elevations to provide articulation and interest and to emphasise the horizontal and vertical features of the facades and the base, middle and tops of buildings and key entrances. This represents good design. Along with the attractive and varied materials, this would create a visually interesting, varied and generally cohesive new place with a strong urban character whilst also responding positively to the existing and emerging townscape context.
- 13.51. The architectural, design and materials quality of the proposed tall buildings within the detailed element of the scheme is of high standard and would respond positively to the surrounding context, as demonstrated in the applicant's TVIA and CGIs.
- 13.52. The Design Code includes appropriate specifications and design rules for key features of buildings and land uses in different areas of the scheme, depending on the location of each block. This approach is supported and would provide a good basis for the delivery of an architecturally rich and interesting approach in terms of materiality and overall design quality. The whole scheme is underpinned by a set of Parameter Plans and Design Codes which will, together with the DAS, ensure that future phases of the development come forward in a cohesive way. The finish will be reliant on design quality being delivered and secured at Reserved Matters Stage. This should be informed by further detailed design reviews prior to RMAs.

d) avoid harm to the significance of London Heritage Assets and their settings.

13.53. This is discussed in further detail in the 'Heritage and Conservation' Section of the report. Overall, the proposal would cause 'less than substantial harm' to the setting of designated heritage assets in the vicinity of the site.

g) buildings should not cause adverse reflective glare

13.54. Glare usually resulting from a direct line of sight to a light source and the reflection from a light source is unlikely to cause a negative impact on the existing surrounding buildings. Possible glare issues for the train drivers could be found to the west of the Site due to the proximity of tall buildings to the train line. The position of the proposed buildings to the west of the Site is parallel to the railway line and the percentage of glazing proposed will be restricted to 30-35% of the external envelope to respond to the environmental requirements for energy and overheating. Therefore, the ES concludes there will not be a significant adverse effect and this consideration and is scoped out of the assessment.

13.55. For the Outline Application, it is not possible to assess either the light pollution of the potential for glare as a detailed design is required to locate the light fittings and the reflective windows. These effects will be assessed as part of any subsequent reserved matters application. As such, it is considered that the proposed development is not likely to give rise to a significant degree of solar glare as the buildings do not include large areas of glazing on the facades.

h) minimise light pollution from internal and external lighting

13.56. A lighting Assessment has been submitted. The Site will introduce new sources of light into the area. The site is categorised as Zone E3 (Suburban) and will remain as Zone E3 (Suburban) once the Site is operational. The Proposed Development will provide modern lighting that is both more efficient and designed to avoid obtrusive light. As set out in the TVIA lighting would be designed to minimise light pollution on the surroundings of the Site. It is considered significant light pollution would not arise.

Functional impact

13.57. The design approach to accommodating tall buildings is supported in terms of ground floor and podium elements which would successfully relate these buildings to the public realm and provide welcoming and easily identifiable entrances and active frontages.

13.58. The buildings have been designed to accommodate deliveries, servicing, refuse and cycle parking facilities and would ensure that the functional impacts are acceptable and would not undermine the quality of the surrounding public realm, which is generally of a high standard. For the outline buildings this approach would be secured as part of the detailed plans and compliance with the design code, with further detailed design assessed at RMA stage. The functional impact of the proposed tall buildings is acceptable.

Environmental Impact

13.59. Environmental impacts in terms of wind, daylight, sunlight and overshadowing have been assessed and have informed the design and massing approach. The

length, width and south facing orientation of the new parks, as well as the varied height and massing of buildings would ensure that these two main public spaces would achieve good levels of direct sunlight. Overshadowing and sunlight assessments have been provided to confirm that the levels of direct sunlight in these spaces is in line with the BRE guidelines.

- 13.60. As can be expected with a regeneration scheme of this scale, there would be some impacts on the daylight levels of neighbouring properties (discussed in detail below). However, the overall daylight levels which would be achieved and the impacts on the surroundings are considered to be broadly in line with other similar high density urban regeneration schemes such as this and do not give rise to an unacceptable level of harm.
- 13.61. The applicant's wind microclimate assessment shows that appropriate levels of pedestrian and cycle safety and comfort would be achieved in the detailed element within the public realm and there would be no major adverse effects. Landscaping conditions are proposed within the public realm to ensure comfortable seating environment which would be secured as part of the detailed landscaping schemes.
- 13.62. There would be areas around and on the outline blocks with unsuitable wind conditions and expected strong wind exceedances. These will be tested at detailed RMA stages to ensure all locations would have suitable landscape mitigation strategies. The cumulative environmental impact has been appropriately considered and tested. The environmental impact is considered acceptable subject to conditions.

Tall Buildings Summary

- 13.63. Where maximum heights are proposed these are used strategically across the Masterplan and in buildings of a high-quality design. In part, it is noted that this is to account for the requirement for additional homes to meet affordable housing targets and viability needs. At present, there is a conflict (with the out-of-date presumption against tall buildings) as set out in Policy DMD43 of the Development Management Policies and the approach taken by Policy D9C of the London Plan.
- 13.64. In such cases where there is a conflict in policy approach, Section 38(5) of the Planning and Compulsory Purchase Act 2004 sets out that where policies of the development plan conflict with each other, the conflict must be resolved in favour of the policy that is contained in the last document to become part of the development plan.
- 13.65. However, officers consider that the visual, heritage, environmental, functional and cumulative impacts are, on balance acceptable. The architectural and materials quality of the proposed tall buildings would also be acceptable, subject to further detailed assessment of the outline elements at RMA Stage. As such, the proposed tall buildings in the detailed and outline elements would meet the qualitative assessment criteria set out in Part C of London Plan Policy D9 and are considered acceptable.

Design of the Detailed Elements (Blocks A, D, N, K and T)

- 13.66. The detailed blocks will be delivered in phases (0-3) and will provide a total of 575 homes, community and commercial space. The detailed elements of the scheme include a range of building and block typologies that will make use of a combination of mixed-use high-street buildings, linear and mansion blocks, taller buildings and residential terraces.
- 13.67. Blocks A and D are located to the north of the Site, between the railway and the north-south route which continues from College Close to Joyce Avenue. The primary facades of these blocks face into the site. Block N, K and T are located to the south of the site. Block N is located between Fore Street and the park. Block K and T are located to the west of the new park with Block T also sitting along the railway. The detailed blocks have been informed by the design code and vice versa.

Block A

- 13.68. Block A is located within the 'Home Streets' character area, the part of the masterplan corresponding to the lower rise existing context. The Block is the enabling Phase 0, to be delivered without the demolition of any homes. It will provide the decant homes for the existing Wadham House with 50 homes.
- 13.69. Block A has two massing's, the taller mansion block (10 storeys) and lower wing of maisonettes and flat above (5 storeys). The flatted part of Block A frames the proposed pocket park around a Category A tree. The larger element of Block A, the mansion blocks comprise a gridded elevation that is generally symmetrical across the east and south elevations. The lower wing that steps from the terraced houses to the mansion block is presented as two vertical elements.



Image: view of Block A from the centre of the site

- 13.70. A more gradual transition along College Close elevation is evident. The building steps from 5 to 10 storeys. Entrance position to Block A is located to the pocket park to bring activation. The proposed facade treatment for the south and east frontages of Block A buff brick architecture, to ensure continuity with the existing setting, a strong bottom datum with darker buff brick which picks up the 2-storey datum of the existing buildings along College Close. The facade of each element is broken down into a more vertical expression by introducing a shadow gap.
- 13.71. A garden path gives access, to the rear communal gardens. There is concern over the efficiency and usability of the communal area to Block A which appears to mainly be circulation space rather than functional amenity areas. However, the block fronts onto a proposed pocket park.

Block D

- 13.72. Block D marks the east-west and north-south routes across the masterplan, as a gateway block adjacent to the railway. The block is the largest in the detailed phases and comprises different typologies. The tallest element is 26 storeys, together with linear blocks (part 8, part 13 storeys), which form a U-shape around a courtyard. Block D proposes 220 homes completes and frames the pocket park, facing Block A.



Image: view of Block D from the centre of the site

- 13.73. The tower marker building has a strong three-storey base achieved by a darker colour to the brick. Complementary brick band detailing is used to break up the buildings and to define the base, middle, and top. Additionally, a continuous band every six floors to give vertical order to the elevation and grouping of the windows. The east/west and north/ south elevations of the marker block are

treated differently, one more horizontal (north/south) and one more vertical (east/west). The top of the building is extruded on both east/west, orientating the building on the east west axis, to create a crown to the top of the building, which will be visible across the masterplan. The corners of the marker block are set back to provide metal balconies which expand the living areas into the outside. High quality brick details and a variety of metal work and glass reinforced concrete are proposed. These are deployed in a variety of ways which give the building interest and variety from short and far views. The base, middle and top are clearly defined and legible granting the building a strong character.

- 13.74. A key feature of the proposed windows is the reveal depth. This adds to the elevational relief and vertical shadow techniques utilised to articulate the façade of the building. The windows of the tower are grouped with metal spandrel panels to enhance the verticality of the building. This verticality is also achieved through the detailing to the vertical piers.
- 13.75. The northern building provides a similar treatment to Block A with its darker two-storey base and brick relief details to the upper storeys, along with shadow gaps to subdivide the elevation. Additionally, this building features bandings every two stories, further dividing the middle sections. The lower deck access building of Block D1 has a distinct treatment to differentiate the typology. Large, chamfered balconies pair the stacked maisonettes into smaller groupings to reflect their domestic scale.
- 13.76. The stacked maisonette typology (8 storey) has accents of domestic components throughout the street elevation. The maisonettes are organised as a terrace with a repetition of private paired entrances. The elevation treatment is a contemporary interpretation of the existing maisonette typology, deriving cues from the existing context. Vertical piers define 4 columns of maisonettes whilst big, chamfered balconies pair the staked maisonettes into smaller portions, giving their dwelling identity.



Image: Block D

13.77. The design of the entrances to private and communal elements as well as those to refuse and cycle stores have a clear hierarchy. Communal entrances are formed by a feature frame, that projects beyond the brick façade of the building and returns to the covered recess of the entrance.

Block N

13.78. Block N is a perimeter block, facing both the high street and park edge with a central courtyard surrounded by deck access. The building ranges from 6-10 storeys in height. Five retail units on the ground floor faces Fore Street. Car parking as well as ancillary spaces, such as plant rooms and bicycle stores, sit in the middle of the podium level. The prevailing material used within Block N is brick to tie into the masterplan materiality. Materials chosen for Block N are proposed to be robust and form a complementary palette of colours and textures.



Image: view of Block N from Fore Street

13.79. Facing Fore Street, the facade is proposed to be broken down into five different segments of varied roof profiles and brick colours, recreating elements of the high street. The overall width of the building is perceived as a composition of smaller masses. The buildings are defined by a variation in brick tone and bond that draws from the existing material palette on site. The ground floor would provide active frontage to the new area of public realm. The commercial units have been designed for Class E use and with shopfronts evenly spread along the Fore Street elevation.

13.80. Facing the park, this facade is split into two volumes, each with a different brick colour treatment, with the tallest massing towards the north. Maisonettes, face the park and wrap around the ground and 1st floors, and have access to the front and back private gardens. This elevation is the least successful of the detailed phases elevations as it is very similar to Block K across the park in colour. The facades are however well mannered and of equal proportion with communal entrances providing clear hierarchy.



Image: Block N from the centre of the Site

Block K

- 13.81. Block K is a perimeter block with a central courtyard and ranges from 5 - 10 storeys in height and fronts the park edge and Home Street. The elevations facing the Park Edge are proposed to be split into two and treated with different brick tones which highlight the difference in height. Both these buildings have a strong brick base datum defined by the maisonettes on the ground and first floors. In addition, vertically aligned projecting balconies are centred within the body of each building.



Image: Block K from the centre of the Site

- 13.82. The 'home street' facade is also divided into two elements with a clear central gap which corresponds to the communal staircase. The facade is proposed to be broken down by vertical recesses with recessed balconies which create a better and less overbearing relationship to block T across the road. Similarly, to the 'park edge' frontage, the top, middle and base are clearly defined by different brick tones and or courses.
- 13.83. The prevailing material used within Block K is brick to tie into the masterplan materiality. Materials chosen for Block K will be robust, well weathering and form a complementary palette of colours and textures.

Block T

- 13.84. Block T is located within the Home Street, adjacent to the railway and comprises ten houses and a flat block of 9 apartments. The houses are three storeys in height and the apartment blocks five storeys in height.



Image: Block T

- 13.85. Each house is provided with a front and rear garden, with additional amenity space provided through upper floor terraces and Juliette balconies. For the terraced houses, the brick articulation is a variation of that seen on the apartment block, with details like the corduroy along the parapets carried through. The sloping parapet is carried though on the apartment block also. Due to the domestic scale, window surrounds have been introduced to add depth to the facade and reduce the expanse of the White/Buff Multi Brick across the upper levels.
- 13.86. The elevation treatment to the apartment block is defined as regular vertical window bays with a sloping parapet with projected stacked soldier corduroy. To the main elevation stretcher course walls and stacked soldier banding are main features with red brick stretcher course to the ground floor.

Design and Townscape Summary

- 13.87. The hybrid application proposes a form of development that has been subject to scrutiny from the LPA, relevant stakeholders and the Design Review Panel. The

proposal would undoubtedly result in a change in scale when compared to the surrounding prevailing townscape. The Site provides an opportunity for a comprehensive redevelopment and there is a need to consider the scheme in its totality.

- 13.88. The proposed street layout promotes creation of safe, active, inclusive and legible streets within the proposed development that will connect well with the surrounding network. The architectural quality and materials are of a high standard. Its appearance would enhance the estate, improving legibility and definition of its urban spaces.
- 13.89. The proposed buildings would have highly articulated facades with a range of colours, tones and layers of depth that would be set out in well-proportioned facades and result in a high standard of architectural quality. This aspect of the scheme would have a beneficial effect on the character of the area.
- 13.90. It is acknowledged the southern gateway towers would be highly visible, in particular. Whilst higher than its surroundings in the immediate vicinity within the borough, the scheme accommodates the tallest buildings to the west and centre of the Site, and steps down in height to existing context thereby helping to achieve a neighbourly response within a high-density development. The proposals scale and height for the blocks depart from the Council's policy on tall buildings (which is out of date). The scheme would not accord with Policy D9(B) because no locations for tall buildings have yet been identified in Enfield and Policy DMD 43 of the Development Management Policies but is found to be in accordance with Policy D9(C).
- 13.91. Given the quality of the urban form including its contextual compatibility, the associated high architectural quality of the buildings, the quality of the open spaces adjoining the buildings, the proposal would meet the objective of achieving well-designed places. It would represent good design, in the terms of the NPPF. It would reinforce the spatial hierarchy of the locality and the architectural quality and materials would meet the requirements of Policies D9. The design would be visually interesting, well-proportioned and would generally enhance local character and would accord with LP21 policies GG2, H1, D3 and D9(C) which seek to achieve good design. These latter policies are given greater weight in the assessment and therefore the proposals would accord with the development plan.

14. Heritage and Conservation

- 14.1. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on Local Planning Authorities (LPAs) to pay special regard to the desirability of preserving the special architectural and historic interest of listed buildings and their settings. Section 72 of the same Act requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 14.2. Paragraph 199 of the NPPF states that great weight should be given to the conservation of a designated heritage asset when considering the impact on the significance of that asset and the more important the asset, the greater that weight should be. Paragraph 200 confirms that the significance of a designated heritage asset can be harmed by development within its setting.

- 14.3. Paragraph 202 states that where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use. Any harm to the significance of designated heritage assets must be clearly and convincingly justified and outweighed by the delivery of public benefits if it is to be in accordance with the NPPF. In the case of harm to non-designated heritage assets in accordance with paragraph 203, a balanced judgement will be required having regard to the scale of any harm of loss and the significance of the heritage asset.
- 14.4. Policy HC1 C. states development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.
- 14.5. Core Strategy Policy 31 requires development to enhance and preserve the boroughs heritage assets. Enfield Development Management Policy 44 requires applications to conserve and enhance the significance of heritage assets.

Designated and Non-Designated Heritage Assets (NDHA)

- 14.6. A designated asset is one which is on the Secretary of State's list of heritage assets and therefore of national importance. A non-designated asset is defined as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. (Para 30 NPPF). For example, one that is on the Council's own local list or even of some local interest but not on the national list. The Joyce and Snells Estate form a non-designated heritage asset and there are several designated heritage assets located in the vicinity of the Site.



Image: Designated heritage assets including Fore Street Conservation Area and The North Tottenham Conservation Area

14.7. The hybrid application has been informed by a Heritage Assessment, in line with paragraph 194 of the NPPF. The Heritage Statement identified several heritage assets within the vicinity of the development. The Conservation Officer has confirmed that the relevant heritage assets have been correctly identified by the applicant's heritage assessment and the following identified assets are most likely to be impacted by the proposed development are listed below:

- Joyce and Snells Estate (NDHA)
- Fore Street Conservation Area
- Angel Place (Grade II Listed)
- White Horse Pub (NDHA)
- St James' Church (NDHA)
- St James' Parsonage (NDHA)
- Edmonton County Court (NDHA)
- The Phoenix Public House (NDHA)
- North Tottenham Conservation Area
- Tottenham Cemetery Conservation Area
- 867 and 869 High Road (Grade II Listed)
- The Coach and Horses (NDHA)

Joyce Avenue and Snells Park (non-designated heritage assets)

- 14.8. The Joyce and Snells (Snells Park) Estate, an early comprehensive redevelopment scheme forms a non-designated heritage asset (NDHA). The site does not contain any designated heritage assets.
- 14.9. Snells Park Estate was part of an early post-war comprehensive redevelopment and was erected in 1957. The architect was T A Wilkinson advised by influential architect planner Frederick Gibberd. It is believed that Gibberd advised on layout and perhaps on architectural forms, but the detailed design and execution of the schemes may have been carried out by the Borough. The original Gibberd plan does not appear to survive, so his original intention is unclear.
- 14.10. Specifically, the six blocks in Langhedge Lane were finished in 1956. They have similar detailing to blocks on the Beaconsfield Estate, where Gibberd was also the adviser, and were presumably part of the original scheme. In the following year, three large 9-storey blocks - Boundary Court, Isis House and Regan House - were erected in a stepped layout, alongside Fore Street. To the south of Boundary Court, the entrance to the estate was marked by a typically 1950s modernist open portico, who also marked the boundary between the boroughs of Tottenham and Edmonton. In the centre of the estate is mixed development, some built circa mid-1960s, consisting largely of two-storey brick units but with one four storey block.
- 14.11. The connection with Frederick Gibberd gives the estate historic interest, even though there is at present no documentary evidence of Gibberd's proposals. The estate was clearly intended to be a landmark, placed at the boundary with two boroughs and with a symbolic gateway to the south of Boundary House, and on this account it has landmark value. The estate also has some urban design quality for the detailing of the six blocks in Langhedge Lane. The Heritage Review of Post-War Public Housing in the London Borough of Enfield (2017) report identifies the Snells Park Estate as having landmark status, urban design quality, historic interest and medium overall significance.

- 14.12. Given the above significance, the Snells Estate forms a non-designated heritage asset (NDHA).
- 14.13. Paragraph 203 of the NPPF states:
The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 14.14. Whilst this designation has been acknowledged by the applicant, Officers do not agree with the applicant's assessment that the overall value is 'very low' (in conjunction with the Twentieth Century Society). The demolition of the estate would cause very high and irrevocable harm by the loss of the non-designated heritage assets. Whilst the loss of the non-designated heritage asset recognised, the NPPF requires this harm to be balanced against the benefits of the proposal, set out below.
- 14.15. London Plan Policy H8 states that before considering demolition of existing estates, alternative options should first be considered, and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. The Twentieth Century Society object to the demolition of the estate and point to a recent appeal (APP/X5990/V/3301508) whereby Secretary of State refused permission to demolish the Marks and Spencer Building in London. The applicant's insufficient consideration of alternatives to demolition are stated to contribute to the reasons for refusal of the appeal. This was however subsequently overturned by the Court of Appeal.
- 14.16. In any case, alternative options were first considered and the potential benefits associated with the option to demolish and rebuild the Joyce and Snells Estate set against the wider social and environmental impacts. Feasibility studies were undertaken to consider three potential options. These included infill development, partial redevelopment and full demolition and redevelopment. The latter option was preferred by most residents and allowed for the most comprehensive approach to be undertaken.
- 14.17. In conjunction with the options appraisal and residents vote, several significant issues have driven the proposals for comprehensive phased demolition and redevelopment. These include the outdated design and layout of the estate which is lacking in legibility and is poorly connected to its surroundings. The layout of blocks has resulted in poorly defined areas of public open space, movement routes and surface car parking which lack natural surveillance. The areas of public open space are not fully optimised in terms of their use and function. Several of the blocks have recurring maintenance issues and require substantial investment to bring properties up to modern standards. Furthermore, the internal residential homes and communal areas are dated and do not meet modern standards in terms of insulation, energy efficiency and private outdoor space.
- 14.18. The proposal will help to maximise the overall housing, regeneration, connectivity, public realm and place making benefits. The site is a proposed site allocation (SA15) in the draft Enfield Local Plan. 32. Officers agree, that in this instance, the proposal for comprehensive redevelopment would be the most appropriate approach, particularly noting the phased single move approach

proposed which would minimise disruption for residents and seeks to retain households on the Site as it is redeveloped.

- 14.19. Having regard to the relative significance of the NDHA and scale of harm, this harm should be given moderate adverse weight and is set against the benefits of the scheme, which are considered to outweigh the identified harm. To mitigate this, a Building Recording Condition is recommended to be imposed given the proposed loss of the estate.

Setting of Fore Street Conservation Area (designated heritage asset)

- 14.1. The application site is immediately adjacent to the Fore Street Conservation Area (CA). The proposal would affect the setting of this CA. The special interest is derived from the inherent architectural value of historic buildings together with the sense of time depth they afford along a historic route into London.
- 14.2. Large sections of Fore Street are designated as a conservation area, which predominantly focuses on the historic buildings that front the street. Fore Street retains a number of good quality buildings which represent a diverse range of architectural styles and typologies and signify the evolution of the street. There is a variety of architectural styles and building ages within the conservation area, although building heights tend to be no more than three storeys.
- 14.3. South of the North Circular, the conservation area boundary is broken by modern development within the district centre, with an outlying southernmost part of the conservation area just to the east of the application site. Like the rest of the conservation area, this southernmost part contains a variety of historic building styles and ages. The County Court and 58 Fore Street (a public house formerly known as The Phoenix and now known as LT's Bar) are prominent and attractive red brick buildings that mark the entrance into the conservation area from the south.
- 14.4. The setting of the CA is largely a mix of modern development along Fore Street either side of the CA boundary and residential side streets to the rear. Tall buildings form part of the setting, particularly for the southernmost part. Silverpoint dominates views along Fore Street in either direction and encloses the southernmost part of the CA with a built form considerably taller than any of the historic buildings to the west and south. Within the southernmost part of the CA, 58 and 60 Fore Street are both locally listed buildings. No 58 is a late Victorian / Edwardian building. No 60 is tucked behind No 58 and is a narrow three storey stock brick building dating from the late 18th or early 19th centuries. Their significance is informed by their age, rarity and architectural quality, notwithstanding modern alterations and additions, with No 58 having additional social value as a historic public house.
- 14.5. The Fore Street CA has been identified as being in 'very bad' condition in Historic England's annual Heritage at Risk Register. The purpose of the register is to identify heritage assets at risk of being lost through neglect, decay or deterioration. As such, the character, appearance and special interest of the Fore Street CA is considered extremely fragile.
- 14.6. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies.

- 14.7. *Detailed Phases (Blocks A, D, K, N and T)*: There will be no impact upon the Fore Street Conservation Area by the erection of these Blocks. It is noted, that if implemented consistently along Fore Street, the landscaping of Block N could in time deliver a very slight heritage benefit through unifying the streetscape and reinforcing its singular linear character (see later comments for weighting).
- 14.8. *Outline Phases (Blocks B, C, E, F, G, J, L M, O, P, Q and Temporary Community Centre)*: Whilst a scheme which maximises (or exceeds) the height parameters for Blocks C and E would be harmful, a detailed scheme which conforms to the submitted Design Code would likely enhance the Conservation Area. With regards to the NPPF, the benefit is likely to be moderate.
- 14.9. Based upon the Parameter Plans submitted, Block G is likely to result in heritage harm to St James' Church (former) due to the height and proximity of the buildings. This would also result in harm to the Conservation Area. Whilst it is challenging to assess the exact degree of harm for an Outline scheme, having regard for the mitigation embedded within the Design Code, the degree of harm is likely to be low (less than substantial).
- 14.10. The introduction of a high-quality civic building to Fore Street also has the potential to enhance the Fore Street Conservation Area. A detailed scheme which conforms to the submitted Design Code would likely enhance the Conservation Area. With regards to the NPPF, the benefit is likely to be modest.
- 14.11. *Fore Street Public Realm*: The proposed landscaping of the Fore Street public realm within and adjacent to the red-line boundary together with a Shadow Section 106 contribution to facilitate further public realm improvements will realise meaningful heritage enhancement to the Conservation Area. With regards to the NPPF, the benefit is likely to be moderate.

Angel Place

- 14.12. Angel Place is a Grade II Listed Building constructed in the mid-eighteenth century and formed of three connected two storey blocks with mansard roofs. Their special interest is derived from their architectural interest as well preserved mid eighteenth-century townhouses together with their historic interest as an example of development along Fore Street at a moment in time in response to social and economic changes at a local and regional level.
- 14.13. The erection of Blocks D (detailed) and B (outline) will have an urbanising effect upon the Grade II Listed Building Angel Place and will distract and distract from some views of the heritage asset. Whilst the negative impact can be reduced through a high-quality design there will remain a very low residual impact. The level of harm to the Grade II Listed Building as a designated heritage asset is at the lowest end of less than substantial.

White Horse Public House

- 14.14. The White Horse is an example of a purpose-built public house constructed in the 1950s and replacing an earlier pub on the same site. It has a moderate degree of heritage significance derived from its historic, architectural and communal value as a purpose built post-war public house. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).

- 14.15. Although an Outline Scheme, it can be reasonably concluded that a future detailed scheme for Block E which conforms to the parameter plans and Design Code would enhance the setting of the White Horse PH. This is a low heritage benefit which, having regard to the relative significance of the NDHA and scale of enhancement, is given modest weight.

St James' Church (former)

- 14.16. St James' Church was constructed 1850 in an early-English gothic style designed by Edward Ellis. It was converted to residential use in c.1982. It has a high degree of heritage significance derived from its historic, architectural and communal value as a place of worship for the community built in response to the growth of Edmonton following the arrival of the railway in 1849. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.17. Based upon the Parameter Plans submitted, Block G is likely to result in heritage harm due to the height and proximity of the buildings. Whilst it is challenging to assess the exact degree of harm for an Outline scheme, having regard for the mitigation embedded within the Design Code, the degree of harm is likely to be low.
- 14.18. Having regard to the relative significance of the NDHA and scale of harm, this should be given modest adverse weight.

St James' Parsonage (former)

- 14.19. The Parsonage associated with St James' Church was constructed 1868 in an early-English gothic style designed by Edward Ellis. It has subsequently (likely c.1982) been converted to apartments. It has a high degree of heritage significance derived from its historic and architectural value together with its group value with the former church. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.20. Based upon the Parameter Plans submitted and having regard for the mitigation embedded within the Design Code, Block G is likely to have a neutral impact upon the former Parsonage. It is acknowledged there is potential for Block G to enhance the former Parsonage.

Edmonton County Court and Phoenix Public House

- 14.21. The Edmonton County Court was opened in 1940 and is a handsome two-storey building of stone and brick. It has a high degree of heritage significance derived from its historic, architectural, and communal value as a local seat of justice which was designed to reflect the judicial system at that time. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.22. Known at LTs Bar, the public house was constructed in the late nineteenth century. Originally called The Phoenix, the building incorporates decorative plasterwork depicting phoenixes. It has a high degree of heritage significance derived from its historic, architectural, and communal value as a purpose-built public house. For the purposes of planning the building is considered a non-designated heritage asset (NDHA).
- 14.23. Based upon the Parameter Plans submitted and having regard for the mitigation embedded within the Design Code, Blocks to Fore Street are likely to have a neutral impact upon the County Court and Public House.

Setting of North Tottenham Conservation Area (Haringey)

- 14.1. The North Tottenham Conservation area includes a number of Georgian and Victorian buildings, some of which are listed and front the High Road and parts of White Hart Lane. The condition of the listed buildings in the conservation area varies and they are interspersed with poor quality buildings and structures.
- 14.2. A principal feature of the Conservation Area is the historic linear continuity of buildings on either side of the High Road and the character of the townscape, and its sense of spatial sequence highlighted by the mix of Victorian and Georgian buildings that help to give the street its scale and sense of place.
- 14.3. The North Tottenham Conservation Area has been identified as being in 'poor' condition in Historic England's annual Heritage at Risk Register. The purpose of the register is to identify heritage assets at risk of being lost through neglect, decay or deterioration. As such, the character, appearance and special interest of the Conservation Area is considered fragile. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies.
- 14.4. The proposed scheme, most notably Blocks O and P, would enclose outward views to north and would be a dominant feature of the townscape which would noticeably change the scale of development whilst also distracting and detracting from the architectural quality of the historic buildings within the Conservation Area. Having regard for existing and consented development in this area together with the quality of the proposed scheme the overall harm would be a moderate degree of less than substantial harm.

Tottenham Cemetery Conservation Area (Haringey)

- 14.5. The Site is within the wider setting of the Tottenham Cemetery Conservation Area. The character, appearance and significance of the Conservation Area is detailed within the associated Appraisal and Management Plan (July 2019). In brief, the Conservation Area is a good example of a Victorian cemetery built after the Metropolitan Interments Act.
- 14.6. Views out of the cemetery are very restricted as a result of significant tree planting within the cemetery and along its boundaries. Having regard for consented development in this area together with the existing tree planting and distance from the Site, the proposed development will not affect the character, appearance and significance of the Conservation Area.

867 and 869 High Road (Haringey)

- 14.7. Nos. 867 and 869 High Road were constructed in the early-eighteenth century and are collectively designated as a Grade II Listed Building. Their special interest is derived from their architectural interest as well preserved early-eighteenth-century town houses together with their historic interest as an example of eighteenth-century development along High Road which has been altered and adapted in response to social and economic changes at a local and regional level.

- 14.8. The erection of Blocks O and P will have an urbanising effect upon the Grade II Listed Building and will distract and detract from some views of the heritage asset. Based upon the Parameter Plans submitted and having regard for the mitigation embedded within the Design Code, the proposals are likely to have a moderate adverse impact upon the Listed Building. The level of harm to the Grade II Listed Building as a designated heritage asset is at the lower end of less than substantial.

The Coach and Horses (Haringey)

- 14.9. The Coach and Horses was constructed in the early nineteenth century and has a high degree of heritage significance derived from its historic, architectural, and communal value as a purpose-built coaching inn. For the purposes of planning the building is considered a non-designated heritage asset (NDHA). The erection of Blocks O and P will distract and detract from some views. The proposals are likely to have a moderate adverse impact upon the NDHA.

Heritage and Conservation Summary

- 14.10. The proposals include substantial new buildings within the setting of designated heritage assets and the demolition of the existing estate. The redevelopment of this Site, also has the potential to realise significant heritage benefits to the Fore Street Conservation Area through removing low-quality twentieth century development and erecting buildings which are carefully designed to reflect the historic character, use, scale, grain and appearance of the CA.
- 14.11. Having carefully considered the proposals, including the submitted ES, TVIA and Heritage Statement, officers consider that the proposals would cause very high adverse harm to the Joyce and Snells Estate through its loss and redevelopment. Having regard for the scale of harm and the significance of this NDHA, moderate weight is given to this harm.
- 14.12. In addition, the scheme would result in a low degree of 'less than substantial harm' to the Grade II Listed, Angel Place, a low degree of 'less than substantial harm' to the Grade II Listed 867 and 869 High Road and a moderate degree of 'less than substantial harm' North Tottenham Conservation Area. Furthermore, because of the scheme's scale, construction will undoubtedly have a prolonged impact (from Phase 2 and Phases 6-10) upon the character and appearance of Fore Street CA.
- 14.13. Taking account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and paragraph 134 of the NPPF, the identified harm to heritage assets has been given significant weight and a balancing exercise against public benefit is required.
- 14.14. Paragraph 202 of the NPPF sets out where a scheme will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 14.15. The public benefits of the scheme are very substantial and as set out fully in the planning balance. These include, optimising the Site and making effective use of a brownfield site, supporting regeneration of Edmonton, much needed market and affordable housing delivery, new social infrastructure, economic benefits through job creation and spending of future residents and biodiversity enhancements. In addition, the proposal improved connectivity with a new

pedestrian crossing to Silver Street Station. Overall, Officers consider that the public benefits of the proposals, outweigh the identified harm and therefore the scheme complies with Section 16 of the NPPF.

Archaeology

- 14.16. London Plan HC1 indicates that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 14.17. The area around Fore Street is designated as Areas of Archaeological Importance. An Archaeological Desk-based Assessment was submitted in support of this application. Historic England (GLAAS) were consulted on the application and advised that, although little archaeology has been found in the area of the Site, it is recommended that an archaeological evaluation should be carried out to fully assess the archaeological potential of the Site.
- 14.18. A condition is recommended to require, first, an evaluation to clarify the nature and extent of surviving remains, and then, if necessary, a full investigation.

15. Quality of Residential Amenity

Unit size and Space Standards

- 15.1. London Plan policy D6 (Housing quality and standards) requires that housing developments meet the minimum space standards and also sets out a range of other requirements in relation to residential quality. Core Strategy Policy H5 seeks to ensure an adequate standard of accommodation to ensure satisfactory levels of residential amenity and quality of life for future occupiers.
- 15.2. Based on the submitted plans, all units in the Detailed element of the scheme either meet or exceed internal floorspace standards with respect of space standards for internal GIA, bedroom sizes, ceiling heights, storage provision and private amenity space.

Aspect

- 15.3. London Plan Policy D6 (Housing quality and standards) Part C states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy and avoid overheating.
- 15.4. 87% of the homes in the Detailed Element have two or more aspects. There are no single aspect north facing units. Of those units which are single aspect, the majority are 1 bed. The layout of the units has been optimised to enhance the overall number of dual aspect units while balancing the need to optimise density and to ensure a quantum of development to support viability. Given the majority of units are dual aspect, natural ventilation through opening windows is an inherent benefit and will provide relief from overheating for those units. The detailed element of the scheme is in accordance with LP D6.

- 15.5. The layout of the homes in the Outline element will be set out within future Reserved Matters applications. This will be based on the approved Design Codes and Parameter Plans. These set out that the block typologies should aim to maximise dual aspect units and achieve 100% dual aspect, where possible.

Private and Communal Amenity Space

- 15.6. All dwellings have access to a private amenity space in the form of gardens or balconies. Balconies comply with 1.5m depth and are commensurate size to the proposed occupiers. Balconies have been designed in the main to be projecting balconies to maximise daylight and sunlight availability to their private amenity spaces. This design feature should be considered in the overall assessment for internal lighting to rooms, discussed below. Where dwellings have private amenity in the form of balconies, there is access to communal amenity spaces in Blocks A, D, N and K which have a southern, eastern, or western aspect. Overall private and communal amenity space is considered acceptable.

Accessible Housing

- 15.7. Policy D7 of the London Plan states that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 of the Development Management Document has similar policy objectives.
- 15.8. In accordance with London Plan Policy D7, 10% of all homes within the Proposed Development will be built to M4(3) 'wheelchair user dwellings' standards. Within the Detailed Element (Phases 0-3), 10% (53) of the homes will be built to M4(3) standards. The remaining required wheelchair accessible homes (up to 145) are to be delivered within the Outline Element (Phases 4-10) and will be confirmed in future RMAs.
- 15.9. A condition has been included to secure that 90% of the units in the development must be provided to comply with Building Regulation requirement M4(2) 'accessible and adaptable dwellings across the scheme and 10% are M4(3) 'wheelchair user dwellings'.

Daylight and Sunlight to New Homes

- 15.10. The Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice (2022)' sets out the tests used to assess daylight and sunlight impacts of development on neighbours, future occupiers of the development and adjacent open spaces. The applicant submitted a Daylight & Sunlight Report (2024) with the results of each of the relevant assessment methods.
- 15.11. The proposed scheme has been developed and formulated over a significant period of time, in consideration of guidance relevant and appropriate at the time. The majority of the design period through pre-application stage was covered by the previous BRE Guidance, which was then superseded by the updated version in June 2022, whereby ADF was the relevant test for internal daylight levels.

- 15.12. The application includes a Daylight, Sunlight and Overshadowing (DSO) Assessment. Chapter 9 of the Environmental Statement provides details of the surrounding assessment.
- 15.13. *Internal Daylight Assessment - Detailed Element:* The Average Daylight Factor (ADF), the No-Skyline (NSL) and the Illuminance (SDA) tests have been carried out to assess the daylight availability within each habitable room of the detailed scheme. All habitable rooms have been assessed. 2,011 rooms in blocks A, D, K, N and T have been tested against BRE guides (2022).
- 15.14. The SDA results, which are the most relevant for assessing internal levels of daylight, under the current BRE Guidelines, show that 60% (1,213 rooms) of the assessed rooms in the detailed element, achieve the illuminance levels (SDA target). 140 failures are deemed marginal, meaning these rooms receive daylight level close to the satisfying criteria (within 10% below the target). In Block A 69% of the habitable rooms achieved the minimum illuminance levels, Block D achieve 81%, Block N 49%, 42% for Block K and 36% for Block T. Where illuminance levels are lower, Blocks N, K and T achieve 100% dual aspect units.
- 15.15. The reductions in daylight levels primarily stem from single aspect rooms facing the courtyard, rooms with balconies or deck access positioned above the main windows, and overshadowing caused by nearby outline buildings in close proximity to the detailed blocks. Deep rooms are naturally the most difficult rooms to achieve the required SDA levels. It is noted that in instances, units indicate a 0% figure on the SDA results. This should not be misconstrued as the room receiving no light at all, but rather this room does not meet the target value across any of the room. The room will still experience daylight pooling and an overall lower value across the room. Furthermore, an offset is normally required for the provision of balconies.
- 15.16. In a redevelopment scheme of this scale, deviations like this are inevitable. It is important that the results are considered flexibility. Overall, the development will experience levels of daylight lower than the BRE recommends. A comprehensive review of areas subject to transgression has been undertaken and these are balanced against other design related factors that will inherently cause deviations to internal daylight levels, such as the inclusion of external balconies. Whilst some of the proposed accommodation will experience lower levels of daylight, the majority of the units in the detailed phases are dual aspect (87%), with good outlook and no north facing units. The proposed units are considered to have reasonable access to light.
- 15.17. *Internal Sunlight Assessment - Detailed Element:* For new buildings, the BRE Guidelines refer to BS EN 17037 which says that a space should receive a minimum of 1.5 hours of sunlight on a selected date between 1st February and 21st March with cloudless conditions. The BRE document suggests 21st March be used. For dwellings, at least one habitable room, preferably a main living room, should achieve at least this minimum criterion and that at least one main window faces within 90 degrees of south. Whilst BS EN 17037 applies to all orientations, the BRE guidelines say that if the room faces north of due east or west, the criterion is unlikely to be met.
- 15.18. The south facing living rooms of all the detailed blocks have been tested. The Sunlight Exposure (SE) results show that 60% of the 174 tested living rooms achieve adequate sunlight throughout the year. The Annual Probable Sunlight

Hour (APSH) results show that 51% of the tested rooms achieve adequate sunlight through the year. 68% of the tested windows achieve acceptable results in the winter period.

- 15.19. The proposed massing is of a scale and height for it to be considered a dense urban development and therefore these deviations to the BRE recommendations are inevitable, balanced in the summary below.

Sunlight on the Ground

- 15.20. The BRE Guidelines state that it is good practice to check sun lighting of open spaces which would normally include: ‘gardens to existing buildings (usually the back garden of a house), parks and playing fields and children’s playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between non-domestic buildings and in public squares, focal points for views such as a group of monuments or fountains’.
- 15.21. The BRE guidelines states that to appear adequately sunlit throughout the year, at least half of an amenity space should receive at least 2 hours of sunlight on 21st March (the spring equinox, when day and night are roughly the same length of time).
- 15.22. The private and communal areas for the detailed element of the scheme have been assessed on 21st March (BRE recommendation) and 21st June (alternative target). In addition, the southern park area has been tested.
- 15.23. The results of the assessment below show that both the courtyard of Block D (space D-1) and block A (space A-1) meet the BRE target on 21 March. Space A-2 (the pocket park) marginally falls below (46%) the criteria on 21 March, however, given that there is a well sunlit open space in close proximity to Block A, the loss in sunlight availability will be compensated.
- 15.24. The two proposed courtyards to Blocks N and K would fall short of recommendation on 21st March. However, this is a typical occurrence of courtyard shaped blocks, which are enclosed. To compensate, these blocks have rooftop amenity spaces which would meet the minimum BRE recommendations and will be well sunlit throughout the year. In addition, there is the availability of suitably lit wider open spaces within the Site.

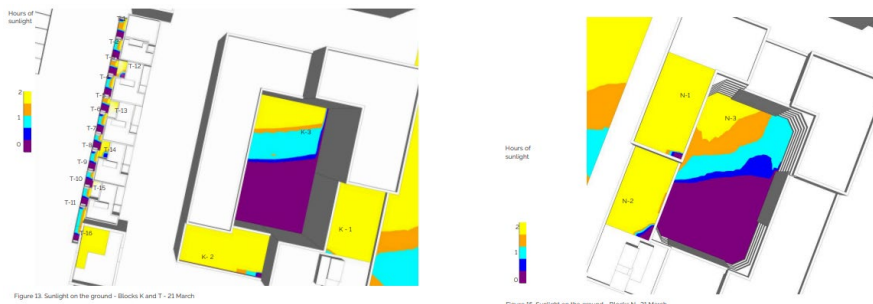


Image: Blocks K and N (detailed phases): 21st March

- 15.25. The private gardens for houses in Block T fall below the 50% BRE guide. This is largely due to fencing, allowing for privacy. However, there is access to open spaces located in close proximity of Block T (southern park) to compensate for the loss of sunlight availability in the back garden areas. The secondary terraces for Block A have good levels of sunlight availability on 21 March.

15.26. The results show there are instances where amenity areas, notably podium courtyards on 21st March are lower than what the BRE recommends. It is noted that there are public open spaces available nearby in excess of the BRE recommendations. All the proposed accommodation will benefit from private amenity spaces, which should have reasonable access to sunlight which does provide some offset.

15.27. Furthermore, there are improvements to sunlighting on 21st June, which is demonstrated in the results. During summer months where there is a greater expectation for access to sunlight, the proposed amenity provides enough sunlight hours for the majority of amenity areas. On balance, given the nature of the scheme and increase in density of development, the instances of underperforming spaces are not considered to be harmful, given the adequate and range of communal and public spaces within the vicinity of blocks.



Image: sun on the ground analysis

15.28. With respect to the Outline element, the areas of public realm are shown to perform well in terms of sunlight to the ground, as shown above. Communal

courtyards to Blocks J, H and B are likely to fail however, though more detail is necessary as part of future Reserved Matters applications. The indicative layouts and information contained within the Design Codes and Parameter Plans suggest the overall form of development that will be suitable in this regard.

Privacy and Overlooking

15.29. Policy D3 (Optimising site capacity through the design-led approach) states that development proposals should deliver appropriate outlook, privacy and amenity. Policy D6 (Housing quality and standards) states that development should demonstrate adequate privacy.

15.30. Within the Masterplan, the permitter block structure is a common arrangement of the proposed buildings. The principal privacy and overlooking relationships will be expressed between proposed new blocks. Massing is located towards the edges of the blocks. The streets and spaces within are defined by the line of the building frontage. The parameter plan below shows the relationship (detailed and outline) between residential building plots within the Masterplan.

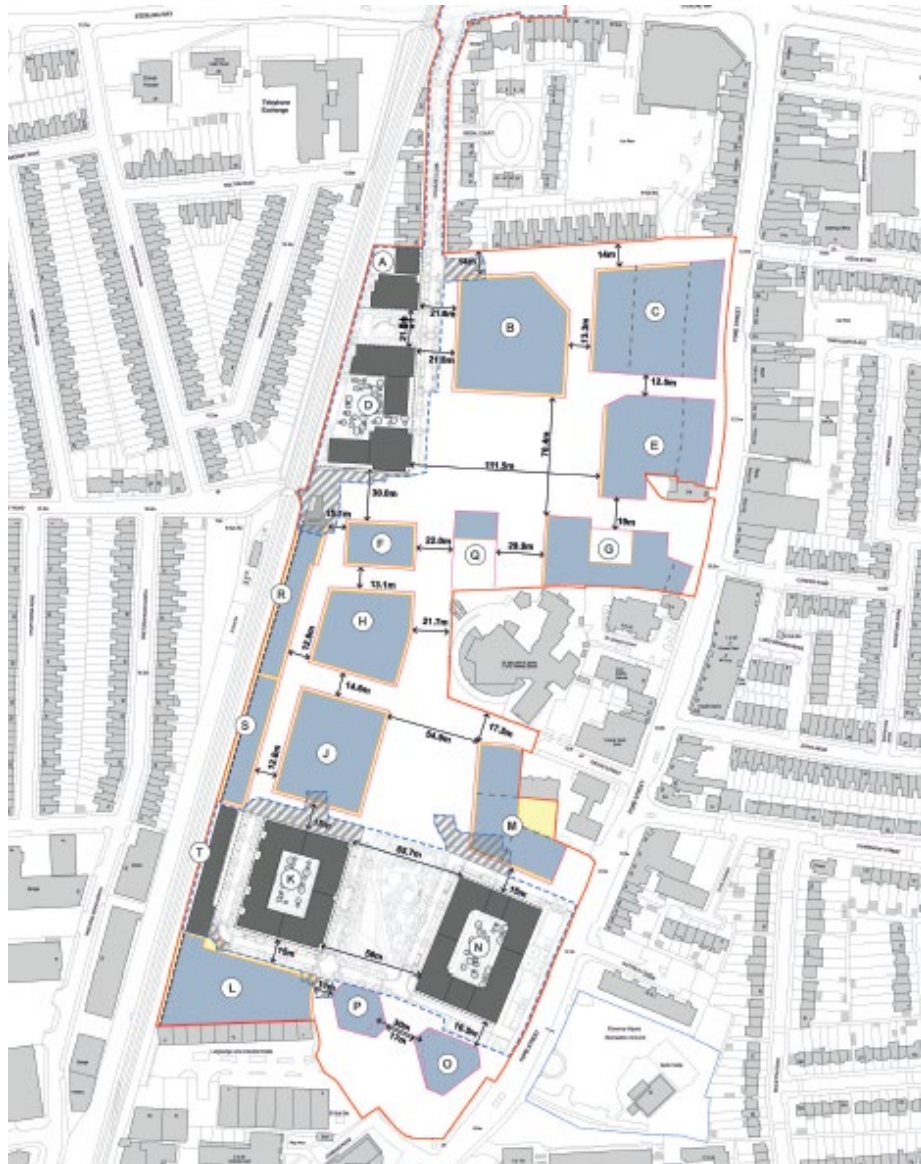


Image: Separation distances between blocks

- 15.31. Where blocks face adjoining blocks and the distance is less than 23m, overlooking would be over a highway and as such would not be contrary to policy. In addition to achieve appropriate townscape and public fronts and private backs, it is considered appropriate for buildings to enclose the public realm in this way.
- 15.32. Between courtyard/podium areas of blocks, distances would exceed 23m. Therefore, there would be no undue overlooking between proposed residents within proposed blocks.
- 15.33. The layout, footprint and built envelope of the masterplan has been developed to ensure privacy between new blocks once complete, and between new and yet-to-be-demolished blocks during construction. With a phased construction programme and phased decant plan, the proposed blocks would maintain an acceptable amenity impact in terms of overlooking.
- 15.34. In an urban context and in 'transformational area where growth is expected to be accelerated and density optimised, it is not unusual for separation distances to fall below 23m. Where these instances occur, this would be over public highway or public realm. On balance, the separation distances between proposed buildings are considered to be acceptable and usually are over a highway.
- 15.35. The proposed masterplan and the design codes include specific block typologies across the Site and will seek to manage principles for amenity, space and built form relationships as the Site is developed. Further, there are proposed codes for streets and spaces (movement and circulation), character areas and landscape and public realm. These include how proposed development will relate to existing buildings, streets and the edges of the site to ensure no undue overlooking.

Secured by Design

- 15.36. London Plan Policy D11 and Core Policy 9 promote the integration of design measures that create safe and secure environments for the community. This is seen as integral to good design.
- 15.37. The applicant engaged with the Designing Out Crime Office of the Metropolitan Police during the design phase, and Enfield consulted the Met during this application review.
- 15.38. The masterplan has been designed to alleviate antisocial problems which currently exist. The masterplans layout aims to be legible, landscape-led, improving connectivity within and through the Site particularly towards Fore Street, Silver Street Station, and over the railway line. It achieves spaces that are well-activated and overlooked with public fronts and private backs to buildings, addressing existing issues of crime and antisocial behaviour, and providing multi-functional and pleasant open spaces for residents. Furthermore, the proposed masterplan seeks to maximise defined active frontages, accessible and safe play areas.
- 15.39. As per the Secure by Design Officers comments, a condition is recommended to ensure appropriate standards are achieved.

Quality of Accommodation Summary

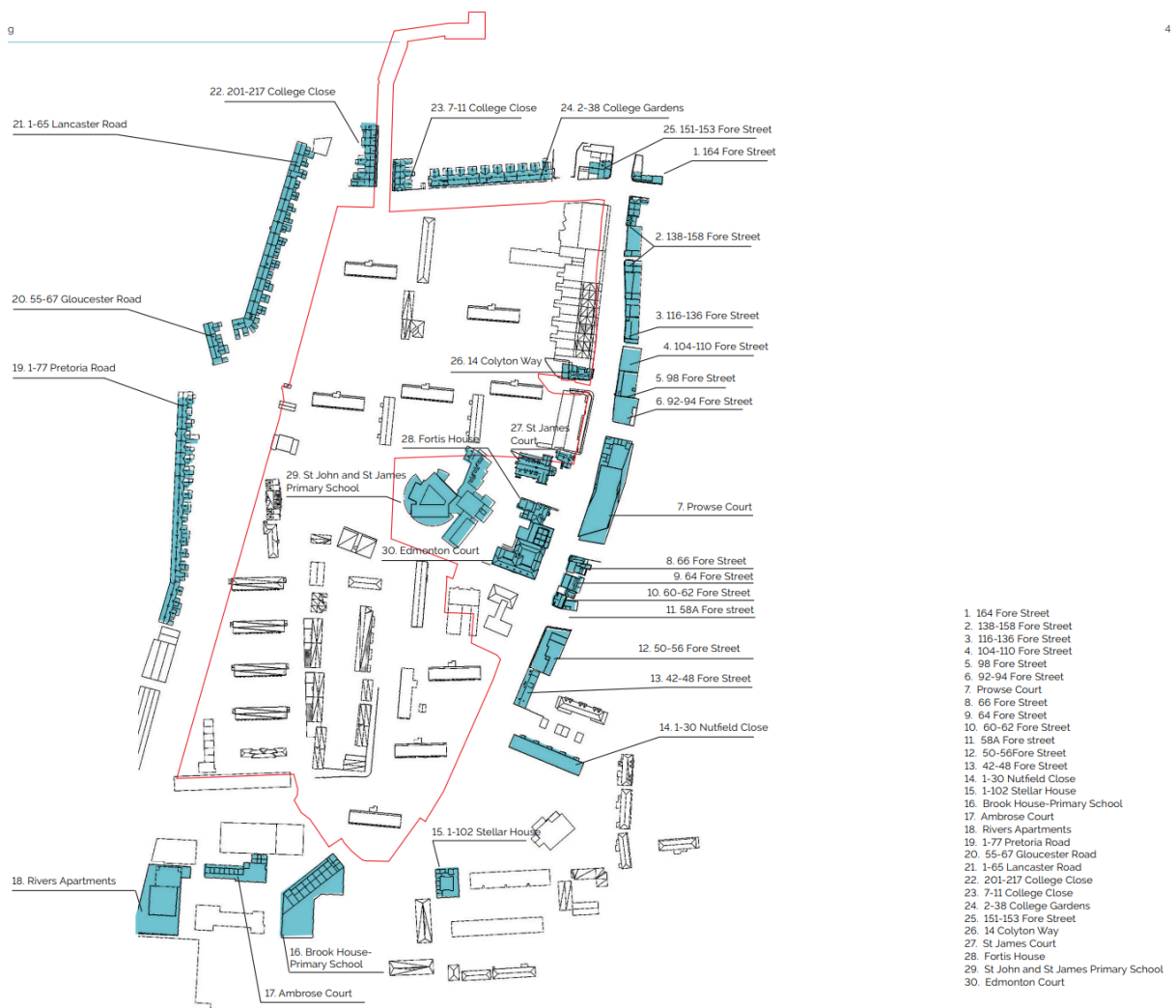
- 15.40. The daylight and sunlight assessment confirms what is expected in that there is a reduction in the amount of daylight available to homes in a denser urban environment and brings the estate closer to the design quality of traditional urban places, where greater extremes in daylight availability, particularly at street level, is a normal feature of urban living.
- 15.41. Some of the proposed units will experience levels of daylight lower than the BRE recommends. In relation to areas of transgression these are balanced against other design related factors that will inherently impact internal daylight levels. Whilst some of the proposed accommodation will experience lower levels of daylight/sunlight, these units will still have reasonable access which occupiers should be able to enjoy. The results demonstrate an overall, reasonable compliance rate. Overall, the majority, of the proposed units will receive sufficient sunlight, balancing the provision alongside overheating, noise, energy requirements, and elevation design.
- 15.42. Whilst a flexible approach is considered prudent to internal sunlight and daylight levels the transgressions are acknowledged and weighed in the balance of the application. Set against this, the provision for residents is considered to improve, in terms of the quality of internal spaces, good outlook, amenity space, energy efficient and high level of dual aspect homes.
- 15.43. In addition, the requirements of the development have been informed by viability, the need to replace existing buildings. This means that more housing is being provided to replace the existing buildings, at a higher density and greater building height, in part to alleviate the shortage of affordable homes and to rehouse existing residents in higher quality homes. The change of the estate from buildings in a landscape with poor supervision of external space and uncontrolled access to spaces between buildings, as well as exposed and insecure front and backs of buildings, to a design with a recognisable urban pattern of streets and parks, is a fundamental improvement in townscape terms.
- 15.44. Overall, the scheme has sought to achieve a balance between these competing factors as well as other planning and design considerations in order to deliver housing, which is of a high quality and sustainable. In terms of the Outline component, the space standards will be assessed in subsequent Reserved Matters planning applications.

16. Impact on Neighbouring Residential Amenity

- 16.1. All new developments are subject to an assessment of their impact on neighbouring amenity in terms of loss of daylight, sunlight, privacy, and an increased sense of enclosure. A development's likely impact in terms of air quality, dust, safety, security, noise, and disturbance is also assessed. In this regard, the proposal is subject to London Plan Policy D6.
- 16.2. Local Plan Core Policy 30 seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Local Plan Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

Daylight and Sunlight Assessment

- 16.3. The application is supported by a Daylight, Sunlight and Overshadowing (DSO) Assessment and Chapter 9 of the accompanying ES and ES Addendum. This summarises the levels of daylight, sunlight and overshadowing for the proposed homes and the wider effects on neighbouring properties.
- 16.4. The NPPF advises that weight should be given to the use of 'suitable brownfield land within settlements for homes...' and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.
- 16.5. A Maximum parameters (worst case) scenario has been assessed. This tests the development as built out to its fullest within the proposed parameters (and an interim scenario) which is the submitted indicative scheme. Major and moderate effects are considered significant in the context of the EIA Regulations. The ES identifies the following definitions for the predicted impacts on receptors and have been agreed with Aecom.
- Major (high) – less than 0.60 times former value (greater than 40% loss);
 - Moderate (Medium) – 0.60-0.69 times former value (31% to 40% loss);
 - Minor (Low) – 0.70-0.79 times former value (21% to 30% loss); and
 - Negligible – Typically greater than or equal to 0.80 times former value.



16.6. A total of 30 properties and 20 open spaces were considered as sensitive receptors. A total of 1,771 windows have been assessed for daylight. A total of 999 rooms were assessed for sunlight.

Daylight Assessment

16.7. The applicant’s chosen methodology follows guidance provided in the Building Research Establishment’s “Site Planning for Daylight and Sunlight” document (2022) and uses the Vertical Sky Component (VSC).

16.8. The BRE Guide explains that diffuse daylight may be adversely affected if, after a development, the VSC is both less than 27% and less than 0.8 times its former value. In situations where post-development VSC figures fail to comply with the levels suggested by the BRE, a further test can be carried out to measure the overall amount of daylight in a room. This is the Daylight Distribution (No Skyline, or NSL) test. BRE guidance state that if the NSL moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants.

16.9. A total number of 1,771 windows were assessed for VSC:

Property	Total No. of Windows Assessed	Beneficial (%)	Negligible (%)	Minor Adverse (%)	Moderate Adverse (%)	Major Adverse (%)
164 Fore Street	19	0 (0%)	19 (100%)	0 (0%)	0 (0%)	0 (0%)
138-158 Fore Street	32	0 (0%)	32 (100%)	0 (0%)	0 (0%)	0 (0%)
1160136 Fore Street	47	0 (0%)	47 (100%)	0 (0%)	0 (0%)	0 (0%)
104-110 Fore Street	4	0 (0%)	4 (100%)	0 (0%)	0 (0%)	0 (0%)
98 Fore Street	28	0 (0%)	28 (100%)	0 (0%)	0 (0%)	0 (0%)
92-94 Fore Street	11	0 (0%)	11 (100%)	0 (0%)	0 (0%)	0 (0%)
Prowse Court	213	0 (0%)	196 (92%)	13 (6%)	4 (2%)	0 (0%)
66 Fore Street	7	0 (0%)	7 (100%)	0 (0%)	0 (0%)	0 (0%)
64 Fore Street	4	0 (0%)	4 (100%)	0 (0%)	0 (0%)	0 (0%)
60-62 Fore Street	8	0 (0%)	8 (100%)	0 (0%)	0 (0%)	0 (0%)
58A Fore Street	18	0 (0%)	18 (100%)	0 (0%)	0 (0%)	0 (0%)
50-56 Fore Street	132	0 (0%)	132 (100%)	0 (0%)	0 (0%)	0 (0%)
42-48 Fore Street	36	0 (0%)	36 (100%)	0 (0%)	0 (0%)	0 (0%)
1-30 Nuffield Close	41	0 (0%)	41 (100%)	0 (0%)	0 (0%)	0 (0%)
1-102 Stellar House	221	0 (0%)	221 (100%)	0 (0%)	0 (0%)	0 (0%)
Brook House Primary School	51	0 (0%)	23 (45%)	4 (8%)	19 (37%)	5 (10%)
1-57 Ambrose Court	144	0 (0%)	85 (59%)	21 (15%)	22 (15%)	16 (11%)
1-100 Rivers Apartments	132	0 (0%)	132 (100%)	0 (0%)	0 (0%)	0 (0%)
1-77 Pretoria Road	135	0 (0%)	113 (100%)	0 (0%)	0 (0%)	0 (0%)
55-67 Gloucester Road	25	0 (0%)	17 (68%)	0 (0%)	0 (0%)	0 (0%)

1-65 Lancaster Road	118	0 (0%)	32 (27%)	20 (17%)	30 (25%)	36 (31%)
201-217 College Close	21	0 (0%)	14 (67%)	4 (19%)	2 (10%)	1 (5%)
7-11 College Close	13	0 (0%)	5 (38%)	3 (23%)	2 (15%)	3 (23%)
2-38 College Gardens	134	0 (0%)	0 (0%)	8 (6%)	36 (27%)	90 (67%)
151-153 Fore Street	10	0 (0%)	10 (100%)	0 (0%)	0 (0%)	0 (0%)
14 Colyton Way	7	0 (0%)	7 (100%)	0 (0%)	0 (0%)	0 (0%)
St James's Court	64	0 (0%)	49 (77%)	4 (6%)	4 (6%)	7 (11%)
Fortis House	13	0 (0%)	13 (100%)	0 (0%)	0 (0%)	0 (0%)
St John and St James Primary School	53	0 (0%)	38 (72%)	3 (6%)	1 (2%)	11 (21%)
Edmonton Court	30	0 (0%)	29 (97)	1 (3%)	0 (0%)	0 (0%)
Total	1771	0 (0%)	1371 (77%)	111 (6%)	120 (7%)	169 (10%)

16.1. 1,371 (77%) windows assessed for VSC, would comply with the BRE criteria, once the development is complete. A total of 999 rooms were assessed for DD. The results of the assessment indicate that a total of 894 (89%) rooms would meet the BRE criteria.

16.2. Adverse effects regarding VSC are found for 12 of the existing buildings surrounding the Site that are being assessed as sensitive receptors. In total 169 (10%) windows display major adverse effects that are considered significant impacts, and 120 (7%) windows display moderate adverse effects. These negative impacts to adjoining occupiers are weighed in the summary.

Sunlight Assessment

16.3. A detailed analysis of the sunlight availability of the existing buildings surrounding the Site has also been undertaken. Of 999 rooms assessed for sunlight, 948 (95%) would meet the BRE criteria for annual APSH. On two existing buildings (Prowse Court (3 windows) and 1-100 Rivers Apartments (48 windows) surrounding the Site demonstrate major adverse effects regarding annual APSH.

16.4. Regarding winter APSH, in total 66 (7%) windows have major adverse effects that are considered significant impacts. These rooms relate to 14 existing buildings surrounding the Site. 933 windows (93%) demonstrate negligible impact.

16.5. These figures are based on the massing of the parameter plans. It is anticipated with further refining at RMA stage, 95% of nearby rooms would meet the BRE criteria for annual APSH and improve (94%) slightly regarding BRE criteria for winter APSH.

Overshadowing Assessment

16.6. The BRE guide recommends that at least 50% of the area of each amenity space listed above should receive at least two hours of sunlight on 21st March.

The 50% criteria mentioned above is also applicable when assessing the impact of a development on an existing neighbouring amenity area. If, as a result of a new development, an existing garden or amenity area does not meet the 50% criteria, and the area which can receive two hours of sunlight on 21st March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

Property	Total No. of Open Space Assessed	Beneficial (%)	Negligible (%)	Minor Adverse (%)	Moderate Averse (%)	Major Adverse (%)
1-30 Regal Court	5	0 (0%)	5 (100%)	0 (0%)	0 (0%)	0 (0%)
5-6 College Close	2	0 (0%)	2 (100%)	0 (0%)	0 (0%)	0 (0%)
7-11 College Close	5	0 (0%)	4 (80%)	0 (0%)	0 (0%)	1 (20%)
201-217 College Close	9	0 (0%)	8 (89%)	1 (11%)	0 (0%)	0 (0%)
34-22 College Gardens	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
2-38 College Gardens	19	1 (0%)	19 (100%)	0 (0%)	0 (0%)	0 (0%)
1-65 Lancaster Road	33	0 (0%)	13 (39%)	9 (27%)	8 (24%)	3 (9%)
55-67 Gloucester Road	7	0 (0%)	7 (100%)	0 (0%)	0 (0%)	0 (0%)
1-77 Pretoria Road North	41	0 (0%)	40 (98%)	1 (2%)	0 (0%)	0 (0%)
Cannon Road	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
1-12 Fore Street	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
1-102 Stellar House	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
Edmonton Court	3	0 (0%)	2 (67%)	1 (33%)	0 (0%)	0 (0%)
8-12 Lord Graham Mews	5	0 (0%)	5 (100%)	0 (0%)	0 (0%)	0 (0%)
3-11 Alpha Road	5	0 (0%)	5 (100%)	0 (0%)	0 (0%)	0 (0%)
1-23 St Jame's Court	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
St John & St James C of E Primary School	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
Florence Hayes Recreation Ground	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
42-48 & 50-56 Fore Street	2	0 (0%)	2 (100%)	0 (0%)	0 (0%)	0 (0%)

1-30 Nuffield Close	1	0 (0%)	1 (100%)	0 (0%)	0 (0%)	0 (0%)
Total	144	0 (0%)	120 (83%)	12 (8%)	8 (6%)	4 (3%)

- 16.7. There will be some impacts of overshadowing from the proposed development on a small number of existing buildings and amenity spaces. These impacts relate primarily to buildings proposed within the Outline element which have been tested against the maximum design parameters (i.e. maximum heights/scale etc).
- 16.8. Further mitigation can be achieved by consideration of massing and detailed design, within parameters established as part of the Outline element, which can be considered and re-tested at future Reserved Matters stage, including the potential to reduce scale and height where required.

Interim Position – Sunlight and Daylight Assessment

- 16.9. Within an EIA it is normal practice to test the baseline position, operation effects and cumulative effects. Given the duration of the build with some blocks remaining in situ on site, close to new blocks, it was requested that the impacts on sunlight and daylight be tested.
- 16.10. A daylight analysis has been carried out to assess the impact of the new development blocks A, D, T, K and N, on the surrounding existing properties that will not be demolished. The image below, shows the location of the existing buildings that surround the proposed development and whose daylight availability may be affected by the new blocks.

4.0 Impact Assessment: Interim Scenario

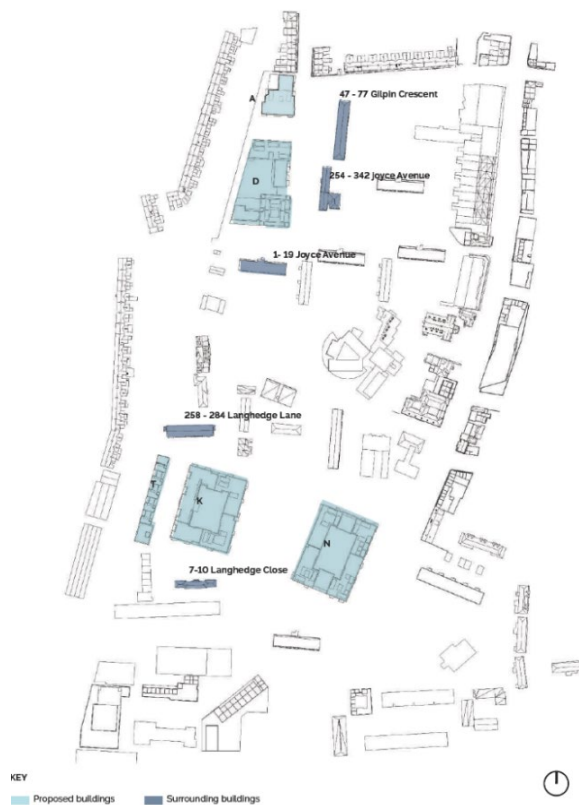


Image: interim scenario after completion of detailed blocks

- 16.11. A total of 264 windows were tested across five residential blocks. 52% of tested windows achieve VSC (Vertical Sky Component) values between 20-27%. Furthermore, 12% of the windows achieve VSC values between 15-20%.
- 16.12. It is noted that 1-19 Joyce Avenue (60 windows) and 254-342 Joyce Avenue (27 windows) would experience major losses (greater than 40% in VSC). 1-19 Joyce Avenue is planned for demolition in Phase 4 and 254-342 Joyce Avenue in Phase 6.
- 16.13. It is anticipated residents could live in these existing blocks for 5 years, in anticipation of decant and then demolition. Whilst harm in the form of loss of daylight is identified, it is anticipated this would not be on a permanent basis, given the planned phased redevelopment of the estate. In addition, the phasing has been planned to mitigate its impact on existing residents and allow for single decant and as such would not warrant reason for refusal, taking account the overall, significant benefits of the proposal.

Summary of Daylight and Sunlight to Neighbouring Properties

- 16.14. A comprehensive assessment of the proposed development on surrounding windows and rooms to nearby dwellings has been undertaken in accordance with BRE guidance and practice. It must be acknowledged that there would be impacts to neighbouring properties and that this is regrettable.
- 16.15. As set out, the majority of neighbouring windows would not see a noticeable reduction in sunlight and daylight. 1,371 (77%) windows assessed for VSC, 894 (89%) rooms assessed for DD, 948 (95%) rooms for annual APSH, 933 (93%) rooms for winter APSH and 120 (83%) open spaces assessed for SHOG on 21st March would comply with the BRE criteria, once the development is complete.
- 16.16. The BRE document offers guidance on generally acceptable standards of daylight and sunlight but advises that numerical values are not to be rigidly applied and recognises the importance of specific circumstances of each case. Urban developments are one example where a different approach might be justified. This is endorsed by the LP Housing SPG which calls for guidelines to be applied sensitively to higher density developments, taking account of local circumstances and the need to optimise housing capacity and the scope for the character and form of an area to change over time. This approach is relevant to the Site. The areas identification for transformation through high density housing development indicates a high scope for its form and character to change over the short and long term.
- 16.17. The policy and guidance are also clear where denser, urban schemes and tall buildings are proposed, an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the impacts of new development. Where the scheme underperforms against relevant targets, this reflects the scale of regeneration being proposed and the need for development intensification across the site to deliver high quality affordable housing.
- 16.18. The proposal would result in some significant individual reductions in daylight and sunlight levels, but this is almost unavoidable in achieving the policy requirement for high density development in an urban setting with significant constraints. This harm is recognised in the planning balance. The results are presented as a worst case. Further mitigation measures can be delivered

through the detailed design of the buildings developed within the proposed maximum parameters at outline stage.

Privacy/ Overlooking and Sense of Enclosure/Outlook

- 16.19. The proposed scheme will result in a series of new blocks across the Site. The proposed new buildings have been designed to address existing streets and public realm. The site is characterised by Fore Street to the east, the railway line to the west and College Close to the north.
- 16.20. Scale, form and height have been carefully considered with buildings responding to their contextual surroundings, notably along the edges of the Site. The majority of blocks respond to their context where typically, there is two storey housing to the north and west of the Site and 3-4 storeys along Fore Street in the east. Whilst there would be an increase in height and density on site, some blocks would potentially overlook a broad swathe of housing, however given the relative separation distances over the adjoining railway and roads between the new built form and the existing, it is considered no direct overlooking would occur, nor would there be an undue sense of increased enclosure. Overall, there would be no adverse impact in terms of overlooking or loss of privacy to adjoining occupiers.
- 16.21. Block A would adjoin existing two storey dwellings and have a particularly sensitive relation therefore to adjoining occupiers to College Close. No. 201 College Close currently has a blank side elevation with storey closet wing and sizeable ground floor addition.
- 16.22. The ground floor of the 5-storey element would abut this flank elevation and at ground floor exceed the existing rear building line of no. 201 with a higher and deeper rear massing. The proposal would be set off the boundary, giving some relief, however it would be appreciable, and it is considered there would be some harm to the rear ground floor outlook and amenity space of no. 201 in terms of increased sense of enclosure.
- 16.23. The main 5-storey element would not project beyond the existing two storey outrigger. However, at first floor level, two private amenity spaces are proposed, and these would be enclosed by a flank wall by 2.4m. This element would project beyond the rear building line of no. 201 at first floor level. The terraces within the first floor are part of a compact layout form that provides little opportunity for views of the rear elevations to adjoining properties to be obtained. Given the overall depth at first floor level, it is considered there would be no adverse impact in terms of loss of outlook or light.
- 16.24. The 10-storey part of Block A would be located perpendicular to the residential gardens of College Close and offer views to the rear gardens. The residential gardens are likely to be already overlooked and any increase, including from Block A would not be out of keeping within the urban context.
- 16.25. In terms of the Outline element, the indicative layout provides a good degree of comfort for the Local Planning Authority with respect to how the scheme will come forward. The design of the overall scheme, as evidenced within the illustrative Masterplan, the Design and Access Statement, and the Design Code, has been developed to ensure that none of the proposed units will have an unacceptable impact on other proposed units, or on existing dwellings/buildings on or adjacent to the Site and/or in the immediate surrounding area.

- 16.26. In general, the site wide design strategy has considered the strategic location of taller buildings along with the juxtaposition with existing dwellings/buildings adjacent. The proposed separation distances between the proposed blocks, coupled with the design approach taken to them, will ensure sufficient distances are maintained between buildings and mitigate against any direct or harmful privacy issues arising to neighbouring occupiers.
- 16.27. The Design Codes and Parameter Plans (providing 'up to' maximum parameters), which will form approved plans, will form a strong basis for the consideration, testing and refinement of future Reserved Matters applications, including the potential relationships between proposed and existing buildings. A Phasing Plan/strategy will be essential to ensure that the scheme comes forward in a suitable and coordinated manner, and within that it will be important to ensure that full consideration continues to be given to existing and proposed residential amenity.

Noise and Disturbance

- 16.28. The technical reports submitted in support of this planning application, including the ES, confirm that new residents would not be subject to undue noise impacts, subject to conditions related to the management of construction, operation of commercial uses and relevant noise controls and sound insulation.
- 16.29. The mixed commercial and residential nature of the scheme means that, subject to using planning conditions to limit hours of use of any commercial units and to control noise from mechanical plant, it should not cause undue disturbance to neighbouring residents. The applicant's Outline Construction Environmental Management Plan also sets out minimum standards and procedures for managing and minimising noise during construction (which could be secured by planning condition).
- 16.30. Further information about the impact of the proposals in relation to noise and air quality, and the impact of surrounding uses on the site itself, can be found within the 'Noise and Air Quality' section of this report (below).

Neighbouring Amenity Summary

- 16.31. The site has been identified as being suitable for redevelopment and regeneration including the delivery of additional affordable housing. To achieve this, the design strategy includes the introduction of a higher density scheme.
- 16.32. The new buildings would for the most part be of a similar scale with the existing on the permitter edges and would re-define street frontages, where currently there is a lot of semi open space on site. Several competing considerations need to be weighed up when developing a masterplan that successfully optimises the most efficient use of brownfield and public sector land, whilst balancing a range of competing design and planning requirements. It has been critical in this instance to take a balanced approach to a series of constraints throughout the extensive design process including the need to optimise the number of homes and associated high quality open space.
- 16.33. The technical evidence demonstrates there will be harmful impacts because of the proposed re-development to certain properties, notably in relation to daylight and sunlight. These transgressions weigh against the scheme. The results are

shown, via the maximum of the parameter plans and it is expected further testing and mitigation of the outline elements can be undertaken as the scheme is developed out, in accordance with submitted Design Code.

- 16.34. Amenity impacts must be considered in the overall planning balance, with the harm weighed against expected benefit. There would be instances of harmful loss of daylight and sunlight to surrounding properties. There would be minimal adverse losses of overshadowing, outlook and overlooking. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents are acceptable, given the overall benefits that the proposed scheme would deliver.

17. Open Space, Landscaping and Trees

Open Space and Landscaping

- 17.1. London Plan Policy D6 sets out standards for housing quality and requires a provision of private open space to meet the needs of the new and existing occupants of the Site and Policy G4 encourages development to provide new areas of open space where possible. The London Play and Informal Recreation SPG sets standards of quantity and quality in the provision of new play spaces.
- 17.2. Enfield Policy DMD 71 guards against the loss of open space resulting from development unless the loss can be re-provided or mitigated. Policy DMD 73 further sets out the Council's expectations around the delivery of play spaces. The emerging Local Plan identifies the value of informal, doorstep and play-on-the-way spaces that are integrated into landscape design. Currently, there is 30,309 sqm of open space on the Site. 10,798 sqm is designated as Local Open Space. The application site is in an area of open space deficiency.
- 17.3. The Site is characterised by underutilised amenity areas, made up of grassland that do not fulfil a meaningful function for residents. There is a lack of definition of public, private, and communal space. Unrestricted public access to the communal areas at the rear of the blocks combined with areas of poor overlooking and natural surveillance along with a lack of identifiable 'ownership' has resulted in issues with anti-social behaviour, and the usability of these spaces.

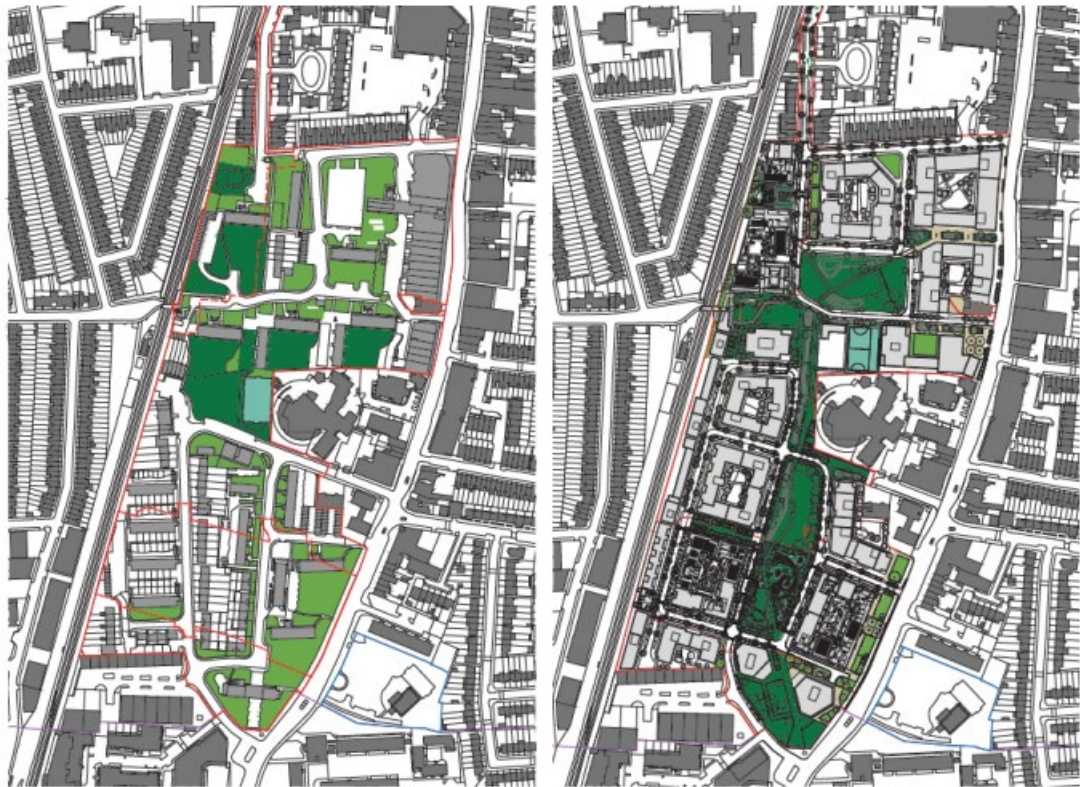


Image: existing and proposed open space

17.4. The Masterplan has been designed to rationalise the way that open space is provided, so that it optimises opportunities for outdoor activity, public health and townscape. The masterplan proposes:

Typology	Existing Provision (sqm)	Proposed Provision (sqm)
Open Space Parkland	10,798 (Designated POS)	20,930
MUGA	1,010	1,185
Soft Landscaping	18,501	5,800
Civic Space (Hard Landscaped)	0	2,420
Total Open Space	30,309	30,335

Table: Proposed Open Space

17.5. The southern portion of 'the Meadows' will be delivered between Blocks N and K and will deliver 3,560sqm of open park space, of which 1,950 sqm will be for play space and supported by a further 4,163 sqm of soft landscaping within the Detailed Element.

17.6. This will include a playground with bespoke natural play set pieces, with traversing level changes designed concurrently with the attenuation strategy. Amenity lawns provide areas for community gatherings and informal play, with dedicated play spaces for younger children. The ecological spine runs through the west of the space and includes woodland trails and attenuation swale.

17.7. Smaller pocket parks on the Site, also form part of the landscape programming in the Detailed Phases. A pocket park is located between Blocks A and D. This will provide amenity space for the adjacent blocks, retaining an existing

Category B tree. This space is divided into three areas dedicated to 0-4 doorstep play, social picnic space and a community growing garden.

- 17.8. In addition, the landscape and public realm strategy includes improvements to Fore Street. The public space to the front of Block N prioritises pedestrian movement whilst providing a plaza space. Spaces will be provided along the southern portion of the elevation to allow for spill out from the Block N retail units. Landscaping is proposed around the existing trees and will provide a green buffer between the high street and building elevation to Block N.
- 17.9. An open space phasing plan is to be secured to ensure delivery of requisite quantum of open space (namely, parks, playspace, public realm and private communal areas) within each phase and associated obligations securing delivery of the same at appropriate stages of the development linked with occupation of a certain quantum of dwellings. By the end of the Detailed Phases (Phase 3) the proposal will create play and amenity lawns along with improved connections to Silver Street Station and Pymme's Park.

Outline Element

- 17.10. New public realm areas are proposed which include the remainder of the park to the south of the site, additional public park (the Northern Grove) and a series of smaller pocket parks, a Civic Square, a School Square, and a plaza space to the south of the masterplan area by Blocks O and P.
- 17.11. Improvements to the public realm along Fore Street are proposed alongside improvements to the area leading up to the railway bridge, which will be connected to an elevated tree-lined walk and there will be a new pedestrian crossing on Sterling Way. Along with the improvements to access and open space, pedestrian-friendly green east-west and north-south connections into and out of the Site will be created to better integrate the Site with its surroundings and improve access to the newly created open spaces within the Site for the local community.
- 17.12. In total, 30,335sqm of new open space is proposed across the Site, which represents a net increase in open space on the Site. Whilst it is acknowledged there is a small quantitative uplift, there would be a significant qualitative improvement in open space with the quality of proposed open space expected to be markedly better than existing provision.
- 17.13. The Proposed Development would lead to a drop from 1.63ha per 1,000 residents to 1.59ha given the anticipated number of future residents on site. However, the proposal will deliver 20,930sqm of new public parks. The Site's ability to meet wider existing deficiencies in open space within the local area needs to be balanced against the established constraints, while meeting the need to maximise the delivery of housing and, new affordable housing.
- 17.14. In addition to open space provided on-site, the Proposed Development will contribute towards enhancements to Florence Hayes Recreation Ground, helping to enhance the quality of 6.24 ha of public open space, discussed below. The Proposed Development will also provide much improved access to Pymmes Park for residents by delivering a new signalised crossing to Sterling Way and associated public realm enhancements along College Close.

17.15. In the Outline Element, open space, public realm, street networks, street hierarchies and meanwhile uses during the phased delivery of the Proposed Development are also controlled by the indicative Phasing Plan and Parameter Plans. Future Reserved Matters applications will need to include information on open space, landscaping and public realm to ensure that the overall landscape strategy is fulfilled.

Open Space Summary

17.16. The Site’s ability to meet wider existing deficiencies in open space within the local area is balanced against the established constraints, while meeting the need to maximise the delivery of new affordable and market family housing. The Masterplan has balanced the requirements for new built form with the delivery of new open space.

17.17. The proposed Masterplan has maximised opportunities for new open space provision through a landscape-led masterplan, delivering a net uplift across the Site that is providing a much-improved quality and function to the benefit of existing and future residents as well as improving existing play on and off site. The new open space created will be welcoming, interesting, useful and safe – and as such the scheme is considered to meet the requirements of Policies D6 and G4 of the London Plan, Policies DMD71 and DMD73 of the Enfield Local Plan.

Playspace and Sporting Improvements

17.18. Policy D3 requires proposals to provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity. Policy S4 requires for residential developments, incorporate good-quality, accessible play provision for all ages.

17.19. The GLA Population Yield Calculator is a tool for estimating population yield from new housing development. The calculator provides users with an indication of the possible number and age of children that could be expected to live in a new housing development of a given bedroom or tenure mix.

17.20. The 10 sqm per child benchmark should be set in the context of the overall open space requirements. Child yield is to be calculated for 0-17year olds (GLA Methodology 2019). The proposed estimated child yield is 1,010 and the required play space is 10,010sqm.

Age Group Years	Requirement (sqm)	Provision (sqm)
0 - 4	4,561	4,850
5 -11	33,390	3,880
12 -15	1,404	5,070
16 - 19	741	2,015
Total	10,096	15,815

Table: Proposed play provision

17.21. The Proposed Development incorporates 15,815 sqm ‘playable landscape’ across the Site, which exceeds the expected child yield required in terms of informal and designated play space and is therefore in accordance with London Plan S4.B(2).

- 17.22. Play spaces are designed to cater for a variety of age groups. All under 5's play will be provided on-site in the form of 'doorstep play' within each of the private communal block gardens. The designed 5-11's equipped play will be provided in the natural adventure playgrounds, and some informal play. The designed 12+ play provision will be provided on-site within the Meadow and the Grove Park areas and will consist of informal amenity spaces, in addition to the improved MUGA facility on site.
- 17.23. Overall, the Proposed Development will provide sufficient play space for the development and complies with the London Plan S4 and the London Play and Informal Recreation SPG.

Detailed Element (Phases 0-3)

- 17.24. The existing playground to the north-west of the Site is to be temporarily relocated to land immediately to the west of the St John and St James CofE Primary School, to reprovide play provision in the interim and facilitate the development of Block A within Phase 0 the Detailed Element, until such time that the first part of the Meadows is complete at the end of Phase 3
- 17.25. The Detailed Phases will deliver 3,560 sqm of open park space (the Meadows), of which there will be 1,950sqm of formally equipped playable space for older children aged 5-11 (0.2ha), with approximately 250 sqm attributed to doorstep play for younger children from 0-4 (0.03ha) which is considered acceptable.

Sporting Improvements

- 17.26. The proposed new units will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site.
- 17.27. As stated above a 1,185m² MUGA will be reprovided directly onsite, within Phase 4, replacing the existing MUGA and improving playing pitches provision locally. This will be accessible to the wider community, unlike the existing. Given the phasing of the construction there will be a period when this MUGA will be unavailable.
- 17.28. As such, a contribution has been secured to upgrade the existing MUGA in Florence Hayes, (directly opposite the Site) which has recently reopened. An offsite financial contribution (£500,000) has been secured to facilitate improvement to the existing MUGA and will be delivered prior to the commencement of Phase 4. By this time the southern portion of the Meadow will have been completed, delivering 3,560sqm of open park space.
- 17.29. The sequencing of the phasing has been done in a considered way to compensate for the short-term loss of the existing MUGA and to provide further improved sports facilities to residents. In light of the challenging viability of the scheme, which is shown in deficit, this level of mitigation is considered appropriate. In addition, the proposed development would offer improved access to Pymmes Park for residents by delivering a new signalised crossing to Sterling Way.

Trees

- 17.30. Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.
- 17.31. Policy DMD80 of the Development Management Document stipulates that developments should not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided. Additionally, Policy DMD 81 of the Development Management Document refers to landscaping.
- 17.32. The site currently has eight Category A trees, 59 category B trees and 148 category C trees. These have been categorised in terms of quality, maturity and health.
- 17.33. No Category A trees or groups are proposed to be removed. Within the Detailed Element, 13 Category B trees and 51 Category C are proposed to be removed.

	Existing	To be removed	Proposed	Net Change
Individual Trees	213	119: - 23 Cat B - 94 Cat C - 2 Cat U	820 - 334 in Detailed - 486 in Outline	+726
Tree Groups	22	8	N/A	N/A

Table: Existing and proposed trees

- 17.34. The Tree Officer notes the tree impacts are (without considering compensation) less than ideal. Around 40% of canopy cover is lost to the scheme. Some larger trees (Category B and C) are proposed for removal. The Category B trees over 50cm diameter have been reviewed and their retention is not feasible with the proposed layout and without a significant redesign. Overall, the Tree Officer has concerns that this may result in a two-tier age structure of the existing and proposed trees.
- 17.35. To offset the loss of existing trees, the landscape proposals include extensive tree planting across the whole Site as part of the landscape-led masterplan. This comprises approximately 820 new trees. 334 trees are to be planted within the Detailed Element (248 at ground level, and 86 at podium level) which will be located along all streets and roads and within all amenity space and public realm areas.
- 17.36. Overall, the number of new trees proposed to be planted represents an increase of 283% from the existing number of trees on-site and would substantially increase canopy cover and arboricultural value on the Site, significantly outweighing the proposed loss of medium and low-quality trees. This will create significant improvements to the current arrangement of trees across the Site and will lead to a net uplift in trees. Given the retention of the best existing trees, and

the large number of new trees to be planted, the loss of those identified existing trees on site is considered reasonable, in this instance.

- 17.37. It is considered necessary to secure a condition for a detailed tree planting strategy and plan to be included as part of the landscape proposals. A condition is also considered necessary to protect the existing trees on site, during the course of construction.
- 17.38. With respect to trees and their impact on biodiversity, (and while this matter is addressed in detail, below, in this report), despite the loss of mature trees and canopy size, the Biodiversity Net Gain Assessment submitted with the application indicates that there will be a 72% increase across the Masterplan. This is acceptable and would accord with London Plan Policy G6.
- 17.39. It is considered that, subject to appropriate mitigation, the Tree Officer is satisfied with the proposal. Conditions are recommended to demonstrate how the trees would be successfully protected throughout the site's development, and a planting plan/schedule and a landscaping specification to be provided including a scheme of aftercare and maintenance. Such details are considered acceptable in relation to trees and in line with relevant policies.

Urban Greening Factor (UGF)

- 17.40. London Plan policy G5 (Urban greening) states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 17.41. A range of urban greening methods are proposed as part of the applicant's landscape strategy. As set out above, there will be a significant increase in trees as well as hedges on the Site, and some of the space used for the proposed buildings would use extensive green roofs. In addition, the landscaping strategy includes semi-natural vegetation, rain gardens, meadow, lawn, and flower-rich perennial and shrub planting zones within the public realm and within podium courtyards.
- 17.42. The baseline Urban Greening Factor for the existing Site is calculated to be 0.26. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that both the detailed element and the scheme overall would achieve an overall UGF score of 0.45. This exceeds the benchmark in the London Plan Policy G5 and is supported.

18. Habitat Regulations Assessment - Impact to Epping Forest Special Area of Conservation (SAC)

- 18.1. There are two statutory designated sites of international importance with 10km of the Site. These are Epping Forest Special Area of Conservation (SAC) within 4.7km to the east and Lee Valley Special Protection Area (SPA) and Ramar, 1.7km to the east.
- 18.2. These are within the 3-6.2km Zone of Influence (ZOI) as defined by Natural England in their Interim Guidance (March 2019). The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland

Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation. The Lee Valley SPA and Ramsar is comprised of a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of manmade and semi natural wetland and valley bottom habitats.

- 18.3. As the Site is located within the vicinity of two internally recognised protected sites with multiple designations, it is necessary for Enfield as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63 (1) of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”).
- 18.4. Natural England wrote to relevant Councils on 20th September 2018, in relation to the establishment of the Epping Forest Special Area of Conservation (SAC) Strategic Mitigation Strategy. Natural England have established a recreational ‘Zone of Influence’. Any residential development (proposing 100 plus units) within 6.2km of the SAC is required to deliver a package of avoidance and mitigation measures as well as make a financial contribution to strategic measures as set out within the costed Strategic Access Management Measures. This is to adequately mitigate, on a site-by-site basis, any recreational impact on the SAC that is located within the Zone of Influence.
- 18.5. Natural England were consulted on this application and outlined the applicant should undertake a Habitats Regulations Assessment (HRA) as well as provide additional detail as to the avoidance and mitigation measures of the development. This work was undertaken by the applicant and submitted to Natural England.
- 18.6. The submitted HRA outlines the proposed measures delivered by this scheme to mitigate recreational pressure on the SAC, as summarised below:
 - Well-designed open space/green infrastructure within the development
 - Enhancements to Pymmes park trail
 - An agreed SAMM payment (to be secured within the shadow S106 Agreement).
- 18.7. The Council’s recently adopted Suitable Alternative Natural Greenspace (SANG) strategy relates to residential development which is granted planning permission after 1st April 2024. It is applicable to the proposed development. The charge is £353 per net additional/net gain in dwellings, and there is a £90 admin charge.
- 18.8. The masterplan proposes up to 2,028 homes and there are still 795 existing homes, the net gain in the number of homes is 1,233. Therefore, the charge per unit would equate to £435,339.
- 18.9. In this instance, rather than pay a SANG sum, key mitigation is proposed to enhance the nearby Pymmes Park and Pymmes Brook trail, to improve and create enhancements to the trail, to create a nature-based walking, recreational facility. Proposed measures include:
 - Entrance improvements to Pymmes Park, plus footpath enhancements, way finding and interpretation within the park
 - Wilbury Way Wetlands enhancements
 - Improved alternative link between Joyce Avenue and Snells Park Estates and Pymmes Brook Trail

- Blue and green features such as rain gardens and tree planting to minimise flood risk and enhance nature and amenity.

18.10. Natural England has reviewed the application and believes the financial contribution to the Council towards improving Pymmes Park and Pymmes Brook should be treated as mitigation. The applicant has confirmed funding to the delivery of these mitigation measures (£450,000), and this is to be secured through the shadow s106 agreement. Payment of this contribution will be at an early stage and paid in one installment such that detailed, consultation and delivery of the Trail project can take place in parallel with the detailed phases (0-3) and completed prior to the commencement of the outline phases (4-10) which is considered a benefit of the scheme. It is proposed that a Pymmes Brook Trail Management Plan is secured through the planning obligations. Furthermore, a SAMMS contributions is secured via Shadow s106

18.11. As such, the Local Planning Authority, as the competent authority, are satisfied with the conclusions and suitable mitigation measures outlined within the HRA. As such any impacts on the Epping Forest SAC or Lee Valley SPA and Ramsar are appropriately mitigated.

19. Biodiversity and Ecology

19.1. The requirement for biodiversity net gain is required by national legislation, namely the Environment Act (2021), which requires all development schemes in England to deliver a mandatory 10% biodiversity net gain to be maintained for a period of at least 30 years. BNG is mandatory for all applications submitted after 12 February 2024. This hybrid application was submitted in 2022.

19.2. The NPPF (Para.174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. At a regional level, policy GG2 of the London Plan requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.

19.3. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy GI4 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough. The emerging Local Plan, although of lesser policy weight, includes Policy BG3 which refers to a minimum of 10% net gain.

19.4. Core Policy 36 requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. DMD Policy 78 makes clear that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided, and it has been demonstrated that appropriate mitigation can address the harm caused.

19.5. The application contains a Preliminary Ecological Appraisal, a Bat Survey Report, a Biodiversity Net Gain (BNG) Assessment, a Habitat Regulations

Assessment (HRA) Report and part of the Environmental Statement focuses on the ecological impact of the proposals.

- 19.6. The existing conditions on site consist of existing buildings, hardstanding and areas of mown grassland and scattered trees. These habitats are of limited ecological value and their loss would not be a constraint to the proposals.

Biodiversity Net Gain Assessment

- 19.7. The application includes a BNG Assessment, which supports and backs up the above consideration, and suggests that both the Detailed and Outline elements of the application will result in significant net gains with respect to biodiversity. Enhancements include tree planting biodiverse and intensive green roofs, rain garden, bioswale, native ornamental hedge planting, an orchard, shrub planting and modified grassland.
- 19.8. The proposals will result in a net gain for biodiversity units. This will result in a net gain of 78.01% for the Detailed phases and 69.72% for the Outline phases. The Masterplan would see an overall net gain of 72.21% which exceeds the requirement of 10% and is therefore in accordance with the above legislation and policy.

Protected Species

- 19.9. The vegetation on site is likely to be used by roosting birds. These could be disturbed if works are carried during the nesting season. This can be addressed by a suitable worded Construction Environment Management Plan for Biodiversity (CEMP – biodiversity)
- 19.10. In addition, one of the buildings on site was identified as supporting a breeding house sparrow colony with over 30 birds recorded during the survey. House Sparrows are listed on the Red List of the Birds of Conservation Concern. They are also listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and as such are a species of principle importance for the conservation of biodiversity in England (i.e. they are a priority species as per the NPPF). It is understood that the building hosting the sparrow colony will be demolished and the report includes a mitigation strategy that will ensure that alternative sparrow nesting boxes are provided on nearby trees and buildings prior to demolition and a condition will be imposed to ensure that this mitigation set out in the Ecological Appraisal is adhered to.
- 19.11. Following the results from the Ecological Assessment, emergence surveys on buildings identified as having bat roost potential were undertaken in the form of two bat transect surveys (Bat Survey report, Greengage, September 2022). The surveys were carried out from August to October 2021. No bats were observed emerging from the surveyed buildings, and low activity was reported during the transects (mostly foraging by common pipistrelle bats). The report concluded that roosting bats were considered likely to be absent from the Site. None of the trees have potential to host roosting bats. In summary the proposals are unlikely to affect roosting bats. However, it is considered necessary to condition bat surveys for future Reserved Matters applications for further checks.
- 19.12. The Ecology report and the Bat report states that bat and bird boxes will be included in the new development. These should be integrated into the buildings

and full details including elevations, numbers, locations, specifications and ongoing management should be secured via a planning condition.

Invasive Species

- 19.13. There are a number of stands of semi-invasive non-native areas of buddleia which would need to be removed in a manner that ensures that they are not spread into the wild. This is to be controlled via a Construction Environment Management Plan which will be secured by condition.

Biodiversity Summary

- 19.14. The application contains relevant supporting information and appropriate methodology has been employed in undertaking required assessments. The Masterplan will drive forward a 72.21% gain overall. Therefore, the application meets the requirements of the Development Plan with respect to targets for biodiversity and ecological preservation and enhancement and is in accordance with adopted and draft local plan policy.

20. Transport, Access and Parking

- 20.1. Section 9 of the NPPF sets out objectives for promoting sustainable transport. Paragraph 105 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 20.2. NPPF Paragraph 110 states that development proposals should ensure that appropriate opportunities to promote sustainable transport modes can be or have been taken up; safe and suitable access to the site can be achieved for all users; the design of streets, parking areas, other transport elements reflects current national guidance, including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 20.3. The London Plan 2021 Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. The Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership, and use, whilst at the same time increasing walking, cycling and public transport use.
- 20.4. Other key relevant London Plan policies include:
- Policy T2 – sets out a 'healthy streets' approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
 - Policy T3 – requires new development to safeguard sufficient and suitable located land for public and active transport;

- Policy T4 – calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and
 - Policy T5 – promotes the provision of an accessible and safe bicycle network with cycle routes and sufficient cycle parking;
 - Policy T6 – indicates that car-free development should be the starting point for all locations that are well-connected by public transport and requires parking bays for disabled persons.
 - Policy T7 – makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 20.5. Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices.
- 20.6. Core Policy 24 requires development to deliver improvements to the road network. Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling.
- 20.7. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.
- 20.8. The proposed development site straddles part of the A406 North Circular Road known locally as Sterling Way and Angel Road which form part of the Transport for London Road Network (TLRN). The site of the proposed development is also bounded by Fore Street to the east, which forms part of the Strategic Road Network (SRN) and includes highway within the Enfield network.
- 20.9. There are bus stops located on Fore Street, Sterling Way and Bridport Road, providing access to the 149, 259, 279, 249, 34, 102, 144, 444 and the 491 service. The nearest station is Silver Street, served by the Overground and to the north side of Sterling Way; and White Hart Lane Overground Station is also located to the south. The Overground viaduct is adjacent to the western of the Site. The Site falls within a Public Transport Accessibility Level (PTAL) of 3 to 5, on a scale from 0-6b, with 6b being the highest accessibility. Cycleway 1 is located north of the Site, 380m north of College Close and stretches west of the Site and continues south down to White Hart Lane Station. There is an Event Day CPZ in place in South Edmonton (which includes the Site) and runs from 12 noon to 9pm on event days only.
- 20.10. The application is accompanied by a Transport Assessment which provides details of the existing highways network and transport infrastructure as well as the existing and proposed delivery / servicing arrangement, car parking, cycle parking and pedestrian movements. The application is also accompanied by an Active Travel Zone audit with recommendations for improvements to the highway network following the principles of Health Streets Indicators.

20.11. The Site has a Public Transport Accessibility Level (PTAL) ranging from 3-5, indicating moderate to good accessibility by public transport. The northern part of the Site is within a 5-minute walking distance of Silver Street Overground Station, which runs a regular train service to Central London. Despite this relatively close proximity, the station is difficult to access from the Site due to the location of existing pedestrian crossings on Sterling Way and significant level changes. The southern part of the Site is approximately a 7-minute walk from White Hart Lane Overground Station, which operates on the same railway line as Silver Street Station.

Public Transport Impact

20.12. The applicants trip generation assessment has been undertaken following the methodology for the nearby Goodyard and Depot applications in LB Haringey. TfL consider this approach reasonable.

20.13. Combined trips by mode for 'work', 'education' and 'shopping, leisure and personal business', have been estimated. TfL raised concern over the applicant's presentation of a reduction in trips, based on people working from home (WFH), in terms of its impact on local rail services and bus services. The applicant has provided a comparison of trips both with and without a work from home scenario. Where there would be no WFH reduction (the 'worst case' scenario), it is shown that the additional trips would have a minimal impact on the highways and public transport network. Both scenarios have been presented in the Travel Assessment, with analysis based on the assumption no-one works from home along with a 'sensitivity test' showing the WFH scenario. This analysis has been noted and agreed by TfL.

20.14. The site is located close to two London Overground Stations – Silver Street (to the north) and White Hart Lane (to the south). Given the proximity of the southern end of the Site to the White Hart Lane station (in particular blocks L, P, O, T, N, and K) it is anticipated that residents in these blocks are more likely to use the White Hart Lane station. It is anticipated there will be an additional 167 passengers in the AM peak and 157 in the PM at Silver Street Station and an additional 55 passengers in the AM and 52 in the PM at White Hart Lane Station. Both Overground stations, operate well within capacity and below the practical capacity at 85% when the proposed development is complete.

20.15. In terms of impact on bus capacity it is likely that there will typically be between four to eight additional passengers per bus. There may be up to 11 additional passengers per bus route 444 and this increase is considered low. These trips could be accommodated without the need for mitigation on public transport.

20.16. Transport for London have not raised concern regarding the impact surrounding public transport infrastructure in terms of capacity. Furthermore, TfL have confirmed the provision of complimentary bus priority measures on Fore Street and as part of the works on the A406 are not required to mitigate any impacts of the development.

20.17. Overall, it is considered that the proposed development will not have a significant impact on the operation of the local transport networks, taking into account other committed developments. As such there is considered to be no adverse impact on forecast demand on the public transport network in terms of local train stations, notably Silver Street Station and local bus services.

- 20.18. It is noted the new vehicle access onto Fore Street (between Block M and N) will impact on existing bus stops and will likely result in these needing to be moved. TfL has acknowledged this and would expect any works to TfL stops are designed in accord with TfL Bus Stop Accessibility Guidance and impacts to bus passengers are minimised. The applicant will need to agree separately the detail of changes to bus stop locations on Fore Street.
- 20.19. Overall, whilst TfL has raised concerns with some of the assumptions underpinning the transport assessment based on the reduction in trips based on people working from home, it is considered that the assumptions are reasonable and given the worst-case scenario there would be no adverse impact on local public transport services. Overall, TfL are satisfied that the proposed development would not have an adverse impact on the existing public transport network.

Healthy Streets and Active Travel Zone Assessment

- 20.20. Policy T2 in the London Plan, requires developments to show how they deliver improvements that support ten Healthy Streets indicators, reduce dominance of vehicles, and improve permeability by foot and cycle. The Transport Assessment (TA) mentions the poor quality and unattractive nature of pedestrian links between existing estates.
- 20.21. The applicants have submitted a Healthy Streets TA to demonstrate how the proposal adopts the Healthy Streets Approach and Vision Zero. It includes an Active Travel Zone (ATZ) assessment. With regards to the ATZ, TfL confirm that it was done in accordance with their methodology.
- 20.22. The whole site will be re-developed and the pedestrian links between the sites will be significantly improved. The key routes to main destinations have been assessed based on the 10 healthy streets indicators with the aim to reduce vehicle dominance and promote walking and cycling. The developments layout meets the healthy streets criteria, by providing planting, trees, benches cycle parking, raised table crossings, parking within the podiums to reduce vehicle dominance, pedestrian and cycle routes to improve permeability, as well as lighting and passive surveillance.
- 20.23. The ATZ identifies the walking route to the Silver Street station as one of the key routes for this development. TfL agrees that a new crossing of the A406 North Circular Road outside Silver Street London Overground station would benefit future residents of the proposed development as well as some existing users of the network, though there would be disbenefits to other road users including bus users.
- 20.24. The review of the proposals has been carried out based on the 10 Healthy Streets Indicators. Overall, the development and public realm ensures the layout and design is attractive and suitable for people who choose to walk, cycle and use public transport.

Access to the site

- 20.25. Access for pedestrians, cyclists and vehicles to the Site will be from Fore Street to the east, via Langhedge Lane; via Colyton Way (with limited one-way exit for vehicles) and via College Gardens. In addition, a new access road is proposed as part of the development between Blocks M and N.

- 20.26. Large vehicles including refuse, delivery and emergency vehicles can use Langhedge Lane, Grove Street, Joyce Avenue, College Close and College Gardens. Furthermore, there will be an access for pedestrians, cyclists, and vehicles to / from Sterling Way to the north via College Close, albeit with restricted access for vehicles from Sterling Way only. Bridport Road via Joyce Avenue will offer pedestrian and cyclist access only.
- 20.27. The internal road layout will include two-way streets, one way working streets and limited access one-way working streets for refuse and emergency vehicles only. Raised tables will be provided in appropriate locations to ensure that vehicle speeds are low and the roads are suitable for all roads users including vehicles, pedestrians and cyclists.

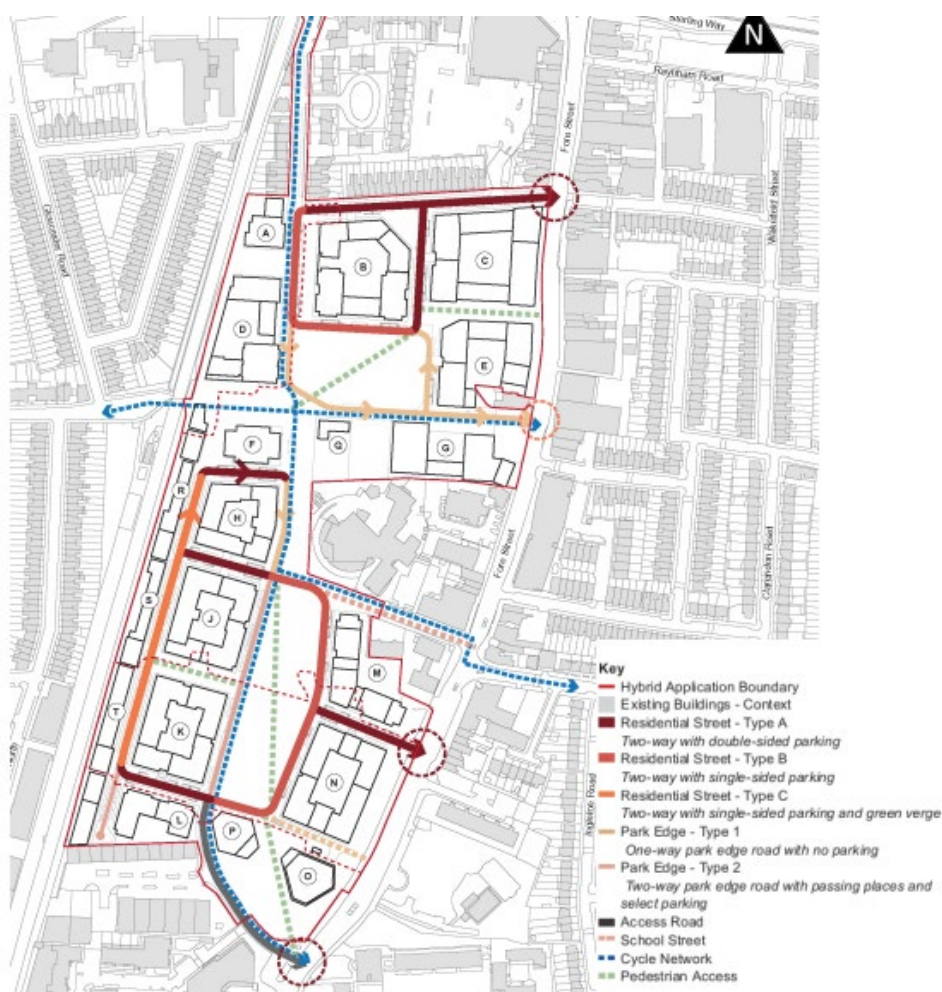


Image: Proposed Internal Road Network

- 20.28. Overall, the masterplan offers improved permeability through the Site, prioritising pedestrian and cycle routes north-south and east-west through the estate. This includes a new ecological spine route which would connect the southern entrance to the estate to Sterling Way via College Close. The new pedestrian crossing on Sterling Way would provide improved access to Silver Street Station (subject to this latter element being secured and delivered).

Car Parking and Measures to Reduce Car Dependency

- 20.29. London Plan policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. It goes on to state that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').
- 20.30. The TA provides a Lambeth Parking Survey undertaken on the 30th and 31st March 2022, covering all roads within 200m of the Site; this showed approximately 1,122 car parking spaces within the study area, of which 891 were occupied, equating a total parking demand of 79% in the wider area.
- 20.31. Parking Surveys show approximately 537 spaces on the estate. Car data from 2011 Census indicates car ownership is 0.45 per dwelling which equates to 360 cars. A total of 402 parking spaces are proposed across the Masterplan, of which 132 will be on street (including 55 Blue Badge spaces), and 270 provided in podiums (including a further 65 Blue Badge spaces). Two parking spaces are proposed for police use between blocks B and C.
- 20.32. The Site is proposed to have low levels of car parking, 0.2 cars per dwelling. The development would be 'car light,' meaning no new parking provided for the future residents (except for the Blue Badge Holders). Parking for existing residents would be re-provided, equivalent to 400 spaces. 2 spaces are for the Metropolitan Police. It is considered that this is sufficient to meet the needs of existing and future residents of the development and encourage the use of Active Travel modes.
- 20.33. The existing estate falls within an existing CPZ, with hours of operation on event days only (noon to 9pm). It is proposed that all internal roads within the estate (except for pedestrian footpaths) will be adopted highway (subject to approval) and it is anticipated that the hours of operation of the existing CPZ will be extended to a wider area to prevent unauthorized parking throughout the day (weekday and weekends). In practice, this will be managed by parking permits only being issued for eligible existing residents of the re-provided 795 dwellings. Residents of any new dwellings will be exempt from applying for a parking permit (unless they are blue badge holders). This will mean that the additional dwellings will be 'car free'. To ensure no undue pressure on parking, a CPZ recommended to be secured via the shadow s106 agreement and restriction on parking permits. This would ensure no additional stress on parking within the estate and wider area, restricting new units from obtaining parking permits.
- 20.34. Of the new 1,233 dwellings (net increase), 10% of dwellings will be designated as wheelchair accessible, which is equivalent to 123 dwellings. Therefore, the provision of 123 accessible spaces meets the Blue Badge parking provision (one space per dwelling for 10% of dwellings).
- 20.35. Given the outline nature of the remaining part of the Site, the parking requirements and distribution are not known at this stage. However, it is envisaged that the parking will be provided through a combination of on plot parking (basement/ parking courts/ podium parking) and street parking.
- 20.36. A Car Parking Management Plan (CPMP) is recommended to be secured by condition detailing how proposed car parking will be controlled, maintained, and managed for the residential units. Furthermore, a Construction Environmental Management Plan, details of EV and car club are recommended to be secured

by condition. A Travel Plan and CPZ, to restrict parking permits is necessary to ensure a modal shift towards walking and cycling and public transport and the new units are 'car free'. These are to be secured via the shadow s106.

Electrical Vehicle Charging and Car Club

- 20.37. In addition, the TA states that the London Plan requirement for 20% of parking spaces to have active EV charging facilities and for the remaining 80% to have passive charging facilities will be met.
- 20.38. It is anticipated that of the 132 on-street spaces, 20% of spaces (equivalent to 26 spaces) will be provided with active EV charging and the remaining 106 (80%) will be provided with cables (passive provision). Of the 270 spaces in podiums, 20% of spaces (equivalent to 54 spaces) will be provided with active EV charging and the remaining 216 (80%) will be provided with cables (passive provision).
- 20.39. It has been demonstrated there is sufficient EV charging for the parking proposed. For the detailed phases it is recommended these details are secured by condition. Owing to the outline nature of the remainder of the scheme, the detailed EV requirements and distribution are not known at this stage. The EV parking arrangements will be secured at reserved matters stage.
- 20.40. Car club bays are proposed, and these will replace some of the on-street parking in the future, details of these measures are to be secured in the CPMP.

Cycle Parking

- 20.41. London Plan policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle.
- 20.42. The detailed element, Phases 0-3, propose to deliver a total of 1,066 spaces. In Block A 97 spaces, Block D 413 spaces, Block N 263 spaces, Block K 252 spaces and Block T 41 spaces. In addition, a total of 82 on-street cycle parking spaces will be provided as part of the detailed blocks and a further 160 on-street visitor parking spaces will be provided as part of the outline blocks.
- 20.43. For the detailed phases, it has been demonstrated that an appropriate amount of cycle parking is proposed in relation to each block and use. An appropriately worded condition to ensure compliance with both quantity and qualitative standards for the detailed and outline elements is recommended to be secured.
- 20.44. Cycle parking for the outline element will be provided in accordance with the London Plan standards at Reserved Matters Stage.

Delivery and Servicing

- 20.45. London Plan policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing, and that provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 20.46. 22 delivery drop off zones are proposed, all within 25m of entrances to each block. Loading bays will be managed by Traffic Regulation Orders with a

maximum stay of 15 minutes and no return within 2 hours. It is considered that the number of delivery bays proposed is considered sufficient and would meet the demand for the predicted delivery and servicing trips.

- 20.47. The Transport Officer notes that as a result of some delivery bays (and 3m wide shared cycleway/footway routes) proposed on the estate, there is the potential for conflict between cyclist and loading/unloading areas. However, the TA sets out that the roads within the Site will be lightly trafficked, with the development as a whole generating approximately 30 vehicle movements (two-way) in each peak hour and up to 312 vehicle movements per day. It is predicted that the majority of delivery and servicing trips would occur between 10 am, 2pm and after 7pm.
- 20.48. In addition, the internal roads are designed with a maximum width of 4.8m wide carriageway (except for one-way streets which are narrower). This width is considered wide enough for a car to comfortably pass a cyclist on-street. Therefore, the roads will likely accommodate cyclists on-street and there is no requirement to provide dedicated cycle lanes. There will be dedicated drop-off zones located throughout the estate. Creating dedicated loading bays rather than allowing parking and unloading on-street allows kerbside activity to be focused on a particular location. This, therefore, reduces any points of conflict.
- 20.49. It is considered that the roads within the estate will therefore be able to accommodate cyclists without the need for creating dedicated cycle lanes. A Road Safety Audit (RSA) has been submitted for the internal road layout for pedestrian, cycle and vehicle access. This demonstrates any areas of conflict can be appropriately mitigated and indicates the layout to be safe.
- 20.50. There will be bin stores within 10m of the internal road network, and it is proposed to provide a dedicated service vehicle access to blocks N and O which were the two identified to be not within 10m of the road.
- 20.51. A Delivery and Servicing Plan and Waste Management Plan for each Phase of the development will be secured by condition. A condition is recommended to ensure that the detailed phase is implemented in accordance with the approved details and that details of the proposed refuse storage and collection arrangements for the outline phase are submitted prior to the occupation of the relevant parts of the development.

Travel Plan

- 20.52. The Travel Plan proposes reasonable and achievable targets to increase the use of sustainable travel modes among residents. The implementation stages of the travel plan establish a comprehensive approach to promoting and encouraging travel by sustainable modes. TfL welcome the appointment of a Travel Plan Co-ordinator to oversee, review and implement the travel plan. These measures are to be secured within the shadow s106.

Construction

- 20.53. London Plan policy T7 states that development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road. It goes on to state that Construction Logistics Plans will be required and should be developed in accordance with Transport for London guidance and in a way, which reflects the scale and complexities of developments.

- 20.54. A Construction Management Plan is recommended to be secured via condition to reduce the impact of both the demolition and construction phases. Measures to promote sustainable travel for the construction workforce should also be considered. The construction routes need to be agreed.

Amendments to Railway Bridge

- 20.55. The existing ramp leading to the footbridge over the railway line and to Bridport Road located at the centre-west of the Site. Currently the bridge does not have sufficient landing space and is not of an appropriate gradient.
- 20.56. As part of the improvements in connections and access across the Site, it has been identified to improve the railway bridge. This will occur in two steps. The existing steps leading to the bridge on its southern side will be removed first (facilitating space for the Energy Centre) and a temporary set of stairs placed to the north, adjacent to Block D, whilst the ramp remains in situ during the Detailed Element (Phase 0). When the block forming 254-342 Joyce Avenue is demolished in the Outline Element (Phase 4), the new elevated walkway and direct stepped access route is proposed to be constructed, and the temporary stairs removed.
- 20.57. The new 'Tree Lined Walk' will provide a new fully accessible 3.5m shared cycle footway that runs around existing retained trees. This new walkway is to be delivered in the early phases of the Outline Element and will connect to the existing footbridge over the railway line. This forms a key element of the new east-west link through the Site. Bringing forward the bridge in full and its detail is recommended to be controlled by condition in the relevant outline phases.

Amendments to Sterling Way/College Close

- 20.58. The Transport Assessment outlines, the proposed amendments to the Sterling Way/College Close junction. A new signalised crossing is proposed over Sterling Way.
- 20.59. The existing two-way operation on College Close is proposed to be changed to one-way only, with left turn only from Sterling Way to College Close. This arrangement will still provide access from Sterling Way for existing residents of College Close, as well as access for delivery and servicing vehicles. The purpose is to prevent rat running from Fore Street to the A406 while maintaining access to the estate and those existing properties on College Close.
- 20.60. The crossing is being designed and delivered by TfL and is to be jointly funded by the developer (50% of overall costs). The contribution would be provided in two instalments, with 25% of the contribution total to be provided when the developer starts on site for delivery of Phase 0. The second trigger would be 'by the end of May 2025 upon Council approval of budget for Block A. TfL have agreed the wording of both triggers, and these are to be secured in the shadow s106. The new crossing on Sterling Way would facilitate an easier and safer connection between the Site and Silver Street Overground Station and to Pymmes Park. Its delivery in the early phases is considered a significant benefit of the scheme.

Sterling Way/College Close Junction

- 20.61. The TA sets out when Phase 6 is completed and Block B is built College Close, will join College Gardens. The existing two-way operation on College Close will be changed to one way only, with left turn only from Sterling Way to College Close, providing access from Sterling Way for existing residents of College Close, as well as access for delivery and servicing vehicles. The majority of vehicles will enter and exit the site via College Gardens.
- 20.62. As part of Phase 0, an interim scenario for the College Close junction is proposed which sees the continued two-way operation of College Close alongside other highways works and improvements, including works to the footway on either side of the junction along Sterling Way to create a shared pedestrian and cyclist surface, an extension of the double yellow lines on College Close, planters and landscaping, and associated signage and kerb treatments. Further public realm improvements along College Close itself will be delivered later in the masterplan following the completion of Block B.
- 20.63. Stage 1 Road Safety Audits (RSA) for the development have been undertaken, on the LRTN network, including the proposed crossing across Sterling Way (to the east of Silver street Station), the proposed amendments on College Close/Sterling Way junction and the proposed junction on Fore Street and the detailed phases (0-4) of the proposed masterplan which is considered acceptable.

Other Matters

- 20.64. The TA refers to existing roads within the estate that will require stopping up, which are detailed in Appendix D. A stopping Up order will need to be applied for under section 247 of the Town and Country Planning Act 1990.

Transport, Access and Parking Summary

- 20.65. The proposed scheme improves connectivity for vehicles, pedestrians and cyclists. The scheme would be 'car light', only re-providing spaces for existing residents. The scheme would deliver a new north-south cycle link and a direct link to Silver Street Station, within the early phases of the development which is a significant benefit. The scheme would not negatively impact the existing road network, subject to the recommended planning conditions and s106 planning obligations referred to above. The assessment of likely cumulative effects, including taking account of likely public transport trips associated with the development on nearby development would be considered acceptable.
- 20.66. Having regard to the above assessment and subject to appropriate conditions and S106 obligations it is considered the relevant policy requirements in relation to transport have been met.

21. Climate Change and Sustainability

- 21.1. London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan's requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme's performance.

- 21.2. London Plan Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 21.3. The above policy also requires development proposals which are referable to the Mayor to calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 21.4. London Plan Policy SI 4 outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy.
- 21.5. NPPF Paragraph 157 outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.

Be Lean Savings

- 21.6. The Be Lean Requirement is proposed to be achieved through a combination of passive and active design measures. The proposals are expected to meet the London Plan policy target of 10% regulated CO₂ emission reductions for the residential portion and 15% reductions for the non-residential portion of the development. The measures to be implemented in the scheme include levels of insulation exceeding current Building Regulation requirements, the installation of high-performance glazing, energy efficient lighting and an efficient MVHR system for general ventilation purposes in all habitable spaces. The implementation of these measures would reduce regulated CO₂ emissions by 16% and 15% for the homes and the non-domestic areas respectively.

Clean Energy Savings

- 21.7. The scheme will be connected to the Meridian Water Heat Network to supply construction heat to the first phase of the nearby Meridian Water scheme. Energetik (the operator) is delivering lower carbon heat, and once connected to the waste heat supply in 2026, the heat will be delivered near to zero carbon, trending further towards zero as the wider grid decarbonises. The network has around 30,000 homes worth of capacity. The proposal for 2,028 homes does not raise an issue in terms of network capacity.
- 21.8. The network will provide the scheme with heating and instantaneous domestic hot water, without the need for hot water cylinders in each home. The connection to the network would reduce regulated CO₂ emissions by 75% and 44% for the houses and non-domestic spaces respectively, when compared to current Part L Building Regulations (2021).

Be Green Energy Savings

- 21.9. PV panels have appropriately been included on the detailed blocks. These have been maximised as much as practicable. In total 718 PV panels with 244 kWp

will be installed for use on the detailed blocks. PV panels will be secured as part of any future RMAs.

Be Seen

- 21.10. The energy performance of the development will be monitored and reported post-construction through the GLA's post construction monitoring platform in line with the 'Be Seen' policy and associated guidance and is pursuant to Shadow s106. Overall, the Joyce Avenue and Snell's Park Estates development achieves a reduction in regulated CO₂ emissions of 91% over current Part L Building Regulations (2013). This meets and exceeds the minimum 35% carbon reduction required by the London Plan. It should be noted that the scheme will be also meeting and exceeding Part L 2021 requirements, but detailed calculations will need to be carried out to define the actual performance.
- 21.11. For Reserve Matters Application an Updated Energy Assessment will be submitted. Depending on the outcome of this, the carbon offset figure can be amended, if necessary, on the basis that the obligation requiring the offset contribution can be suitably worded to enable this. This approach ensures the application is consistent with current GLA guidance and enables a review of the assessment against Part L 2021 (or as amended) prior to future phases of the development commencing.

Carbon Offsetting

- 21.12. Whilst the minimum required on-site reduction has been met, the submitted energy strategy demonstrates that the development as a whole does not meet the London Plan's "zero carbon" requirement.
- 21.13. If the net zero-carbon target cannot be met on site and the GLA is satisfied that on-site savings have been maximised, then the annual remaining carbon emissions figure is multiplied by the assumed lifetime of the development's services (e.g., 30 years) to give the cumulative shortfall. The cumulative shortfall is multiplied by the carbon dioxide offset price to determine the required cash-in-lieu contribution. Boroughs are expected to use the recommended carbon offset price of £95 per tonne of carbon dioxide, or to set their own based on local viability evidence. The site wide annual carbon shortfall of tonnes per annum of regulated CO₂ - will need to be addressed through a cash-in-lieu contribution (£153,457) to the Council's Carbon Offset Fund and secured pursuant to Shadow s106.
- 21.14. Further assessments will need to be carried out for the outline element to ensure on-site carbon reduction measures are maximised. Carbon Offset contribution requirements for future phases, as part of future Energy Statements will be secured in the shadow legal agreement.

Whole Life-cycle Carbon Assessment

- 21.15. The applicant has submitted a whole life-cycle carbon (WLC) assessment. The WLC assessment reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks.

- 21.16. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at the more detailed design stage when materials are being selected and specified. The WLC Assessment complies with London Plan Policy SI2. A condition is secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions.

Circular Economy

- 21.17. The embodied carbon from demolition is significant. A Circular Economy Statement has been submitted which outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting re-usability, adaptability, flexibility and longevity.
- 21.18. The Circular Economy Statement complies with London Plan Policy SI7. A detailed Circular Economy Statement is secured by condition for each Reserved Matters application. A condition is also secured requiring the applicant to submit a post-construction report.

Cooling and Overheating

- 21.19. Overheating modelling has been undertaken. A sample of domestic units were analysed, 10 out of 2000 units. Similarly, one communal corridor of Block A has been modelled as a worst case, due to its position (top-floor) and size (increased internal gains from pipes). The Sustainability Officer has expressed concern at the level of sampling.
- 21.20. The potential risk of overheating, as set out will be mitigated by incorporating passive and active design measures. These include minimising internal heat generation through energy efficient design of the energy centre and heat distribution network as well as using efficient lighting; reducing solar gain through optimising window sizes, uses of balconies and recessed windows to provide shading and internal blinds and low g-value glazing where necessary; and, mechanical ventilation heat recovery (MVHR) is proposed for all dwellings and commercial spaces throughout the proposed development allowing for the dissipation of any heat build-up during peak summer conditions.
- 21.21. The detailed scheme has maximised dual aspect housing (87%) and the potential for natural cross-ventilation of homes. Where windows are assumed to be openable without noise issues the overheating criteria would be achieved.
- 21.22. On specifically identified homes there are noise issues associated with the railway and adjacent roads which mean that the overheating assessment has needed to assume closed windows and active mechanical ventilation and cooling. This is acceptable given the noise assessment findings and overall acceptability of residential quality.
- 21.23. The results of the overheating assessment show that all domestic spaces, demonstrate compliance with the overheating criteria in line with London Plan's Cooling Hierarchy. Based on the overheating sampling size of units, it is recommended to condition an overheating assessment for any future RMAs.

Digital connectivity

- 21.24. A planning condition is recommended requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Sustainability Summary

- 21.25. The proposed buildings would reduce carbon emissions. Planning conditions are recommended to secure commitments in relation to water usage, BREEAM 'Excellent' for the commercial units and measures to further the Circular Economy agenda. Subject to s106 planning obligations, the scheme would be connected to the proposed Heat Network to help deliver a reduction in carbon emissions with offsetting financial contributions making up the shortfall, as such the scheme is considered in accordance with London Plan SI 2 and SI 4.

22. Air Quality and Noise

Air quality

- 22.1. Policy SI1 of the London Plan set out the requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 22.2. At a local level, Core Strategy Policy 32 requires that developments improve air quality by reducing pollutant emissions and public exposure to pollution. Policy DMD65 of the Development Management Document requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 22.3. The Site is located within the borough-wide Air Quality Management Area (AQMA), which covers the Council's administrative area. It is also located partially within the A406 North Circular Edmonton and Fore Street Air Quality Focus Area.
- 22.4. The potential effects of the proposed development have been assessed in Chapter 5 of the Environment Statement and addendum. The Assessment considers the location and impact of the proposals in context of existing uses, streets and infrastructure and examines any risk to occupiers associated with air quality. The scope assesses both the construction and operational impacts of the proposed development. The assessment considers the impact of concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) during the completed development stage. The assessment also considers the potential impact of dust and PM₁₀ emissions in the vicinity of the proposed development during the demolition and construction stage.
- 22.5. The suitability of the site for future residents and users has been considered by predicting future concentrations of Nitrogen Dioxide, Particulate and Fine Particulate matter within the site. The results indicate a negligible change in NO₂, PM₁₀ and PM_{2.5} because of the development. Air quality is generally

expected to improve with time, due to more stringent emissions standards for motor vehicles and the uptake of cleaner vehicles.

- 22.6. Enfield's Environmental Health Officer has reviewed the submitted information. The officer accepts the results and has raised no objection to the proposed scheme, subject to the introduction of appropriate conditions, including on-road mobile machinery and construction management plan (discussed below).

Air Quality - Construction

- 22.7. The demolition and construction works will give rise to a risk of dust impacts during demolition, earthworks and construction, as well as from track out of dust and dirt by vehicles onto the public highway. The overall construction period is assumed to be over a period of approximately 22 years.
- 22.8. The ES identifies measures to mitigate dust emissions required during the demolition and construction works. These include damping down materials, wheel washing and sheeted vehicles. It is proposed to mitigate impacts by securing a Construction Environmental Management Plan (CEMP) via condition which set out best practice.
- 22.9. Taking account of comments by LBE Environmental Health Officer, it is recommended that in addition to CEMPs, conditions relating to Non-Road Mobile Machinery (NRMM) and Construction Logistic Plans are secured for development phases through appropriate planning conditions.
- 22.10. With suitable mitigation in place, the ES concludes that the cumulative effects of demolition and construction should be not significant across the Site. Given the appropriate mitigation there would be no adverse air quality impacts during the construction of the development.

Completed Development – Air Quality

- 22.11. Air pollution has been modelled at the completed development. The predicted effects at this stage are identified as road traffic emissions and emergency generator emissions and some potential from trains. The submitted assessment indicates that the proposed development will not cause any exceedance of the air quality objectives and that the overall air quality effect of the proposed development without mitigation will be not significant, beyond best practice design measures. The assessment of the completed development also demonstrates that the new receptors introduced into the local area through the redevelopment of the Site will experience acceptable air quality.

Conclusion - Air Quality

- 22.12. The Council's Environmental Health Officer does not raise an objection to the proposals, subject to the imposition of relevant conditions. The Environment Assessment concludes that overall, the proposed Development has demonstrated to be acceptable in air quality terms with appropriate mitigation measures in place, secured by condition. Accordingly, the development would be considered in accordance with London Plan Policy SI 1, Core Strategy Policy 32, Policy DMD 65, and Paragraph 186 of the NPPF.

Noise and Vibration

- 22.13. London Plan Policy D14 requires development to avoid significant adverse noise impacts on health and quality of life and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses.
- 22.14. Policy DMD 68 states that developments that generate or would be exposed to an unacceptable level of noise will not be permitted. Developments must be sensitively designed, managed and operated to reduce exposure to noise and noise generation.
- 22.15. Chapter 6 of the Environmental Statement considers the potential effects of noise (and vibration) and the suitability of the Site for the proposed development, along with any direct effects during the construction period.
- 22.16. The following impacts were identified for consideration within the Noise assessment:
- Direct effects of noise and vibration during construction. This is inclusive of construction and demolition activities and construction traffic;
 - Direct effects of plant noise associated with the operation of the Site; and
 - The suitability of the Site for the Proposed Development. Noise associated with the operational stage will be based upon external building services, plant and commercial units/activity.
- 22.17. Noise and vibration reduce over distance and the study area encompasses the Site and the nearest receptors which are considered sensitive to noise and vibration and likely to experience significant effects, inclusive of existing residents within the Site boundary.
- 22.18. The existing baseline environmental sound climate across the Site is typical of an urban location. Noise sources include road traffic, overground trains, commercial vehicles, with road traffic noise from Fore Street dominating the acoustic climate along the eastern boundary. To the west, periodic train movements along the overground line were identified as the primary noise and vibration source. Noise levels reduce towards the centre of the Site but there is an underlying level of road traffic noise from the wider area, including from the North Circular (A406). There are a number of air quality and noise sensitive receptors located in close proximity to the Site including residential properties, shops, religious premises, hospitals and schools.

Noise and vibration - Construction Phases

- 22.19. The construction phases have the potential to have significant noise impact on neighbours if not sufficiently monitored and controlled, and significant effects at several receptors are predicted. These could include excavators, power tools, movement of materials, dozers, cranes, construction traffic and other general site activity. The ES has considered the different stages of the construction programme, to identify the potential for effects at sensitive receptors in close proximity to the works.

- 22.20. The assessment concludes that in respect of effects from demolition and construction activities, typical conditions will result in negligible to minor adverse effects at all receptors and therefore are not considered to be significant. At residential properties immediately adjacent to works (particularly to the site boundary) construction noise may reach levels numerically representative of a moderate to major effect but this will only be temporary in nature. In the context of the proposed mitigation measures when these works are occurring, it is expected that significant effects will be avoided.
- 22.21. The assessment of construction traffic noise indicates that the residual effect is not considered significant. When the proposed levels of trips are compared to baseline traffic data; the uplift represents a 3-6% increase in the total number of HGVs. This is considered a negligible increase, and by association any increase in noise levels because of construction traffic will also be negligible. The assessment reports that contractors will ensure that construction works are carried out in accordance with best practicable means and mitigation measures will ensure that noise and vibration levels are kept as low as practically possible.
- 22.22. The Environmental Health Officer has raised no objection to the proposal in relation to the construction phases. To control the impacts during the construction phases, conditions in relation to noise from fixed plant and equipment and construction noise (to be included in Construction Management Plan) are recommended.

Noise and Vibration - Completed Development

- 22.23. The proposed residential uses are the most sensitive to noise and vibration. In relation to internal residential sound levels, the eastern facades of Blocks C, E and N, which directly overlook Fore Street, and the western facades of Block A, D, T, U, V which directly overlook the railway line, could experience daytime and night-time sound levels which exceed the required levels.
- 22.24. Appropriately designed façade elements, and acoustically rated ventilation and glazing to mitigate impacts are considered acceptable in this location. Furthermore, the use of MVHR with cooling means that the risk of overheating can be minimised with windows closed to help ensure that noise ingress into homes is not unacceptable in amenity terms.
- 22.25. 3D noise modelling has also been undertaken alongside the noise surveys to identify the levels of sound to external amenity spaces, including balconies, roof gardens, and central courtyards for the podium blocks (Blocks D, N, and K within the Detailed Element). Noise in these areas should not normally exceed 50dB LAeq T but an upper guideline of 55 dB LAeq T would be acceptable. Achieving this can be challenging in urban areas and/or sites within close proximity to transport networks. The modelling showed that whilst noise levels would exceed the upper guideline along the boundaries of the Site, including to the west adjacent to the railway line which includes the communal space to the rear of Block D and the private gardens associated with the homes provided as part of Block T, these levels fall towards the centre of the Site and within the podium courtyards they are within acceptable levels. All residents will have access to quieter podium courtyard spaces, which will mitigate the effect of higher sound levels elsewhere.
- 22.26. It is also necessary to consider noise impacts arising from proposed uses within the development. Noise associated with the operation of the Proposed

Development is expected to be limited to external building services plant serving the Proposed Development and activities associated with commercial units. It is considered that noise impacts arising from building services equipment can be dealt with satisfactorily by condition. For the detailed and outline element, within the commercial/retail element, floorspace conditions are recommended and to restrict opening hours. Similarly, for proposed commercial units, suitable conditions should be introduced to control delivery and servicing times and, for all uses are recommended. A detailed assessment will also be undertaken as part of future Reserved Matters applications.

- 22.27. Whilst at the most sensitive locations, noise levels will be higher, the results of the applicants modelling exercise demonstrate that while noise levels along the boundaries of the site can be expected to exceed the upper guideline threshold for external amenity space, noise levels towards the centre of the Site readily fall within desirable levels. On the basis the proposed development is considered acoustically suitable.
- 22.28. The Council's Environmental Health Officer has advised that conditions can be introduced to ensure such measures which will help manage and achieve acceptable levels of noise. Appropriate sound insulation will be required along with relevant insulated glazing both and noise from fixed plan, all of which can be suitably controlled by condition.

Conclusion - Noise and Vibration

- 22.29. The relevant ES chapter demonstrates technical compliance is achieved with regards to relevant planning policies to ensure that future residents will enjoy a satisfactory standard of living accommodation within the dwellings, whilst also safeguarding existing background noise levels through appropriate design and mitigation measures.
- 22.30. No objections have been received from Environmental Health Noise Team. Conditions will be imposed accordingly to ensure that a suitable noise environmental is maintained to neighbouring occupiers during the construction period of the development.

Agent of Change

- 22.31. London Plan Policy D14 states that residential development proposals should manage noise by a range of measures which include reflecting the Agent of Change principle as set out in Policy D13. The Agent of Change principle predominantly concerns the impacts of noise generating uses and activities.
- 22.32. Immediately to the south of the Site is Langehedge Lane Industrial Estate, designated as a Locally Significant Industrial Site. There are 19 industrial units, comprising of different ages and architectural styles. Principally Block L in the outline element (proposed as residential) would adjoin Langehedge Lane Industrial Estate. The relationship between the Site and adjoining site at Langehedge Lane would not fundamentally change as a result of the proposed redevelopment, given both would retain their predominant uses, albeit the application site would densify, resulting in appreciable change in massing and heights of proposed blocks.
- 22.33. The Design Code and Parameter Plans have accounted for the existing industrial uses on Langehedge Lane, whilst aiming to not preclude any

development which may come forward in the future. The internal layouts of the typical floors of Block L have been designed to avoid overlooking from habitable rooms on to the adjacent land to the south beyond the site boundary. By doing so, it is considered the existing uses would not be prejudiced. Habitable rooms would not face onto the Site, mitigating the potential to jeopardise their operation. In addition, this would not stymie development and allows for the future potential redevelopment of the Site, by not introducing unreasonable constraints within the vicinity of the adjoining site.

- 22.34. Policy D13 also considers other nuisances including dust, odour, light and vibrations (see Policy SI 1 Improving air quality and Policy T7 Deliveries, servicing and construction). In relation to the Outline Element, indicative maximum areas for a variety of land uses are shown on the relevant Parameter Plans and set out in the accompanying Development Specification. Although the details associated with these uses is to be set out in future RMAs, it is expected that a consistent strategy for the Outline Element will apply, as used for the Detailed Element. This would involve the submission and agreement of noise management plans and consider local measures such as restrictions on opening hours and outdoor seating and would be subject to conditions.
- 22.35. In addition, non-residential uses which could have the potential to create noise and other impacts have been located a sufficient distance from existing and proposed residential uses and have, where possible, been clustered together, for example, the nursery (Block Q) being located adjacent to the Civic Hub (Block G) containing a variety of community, leisure, and workspace uses. Furthermore, the commercial and retail uses proposed are located along Fore Street, where they are largely re-provision of existing premises along a busy high street and at the base of Blocks O and P where although they will provide a vital active frontage, measures such as those mentioned previously could be incorporated to minimise noise and other impacts.

23. Waste and Recycling

- 23.1. London Plan Policy SI7 calls for development to have adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables and food.
- 23.2. London Borough of Enfield provide guidance on the required bin types/size and storage capacity for communal residential units. The guidance asks for 4 x 1,100L bins (refuse) and 1 x 1,280L bin (recycling) for every 20 units served. Additionally, and following further consultation with the LBE waste strategy team it has been requested that as a minimum a 240L wheeled bin is provided within each bin store to be able to accommodate food waste. Household waste storage has been shown in accordance with the above guidance (as set out in table 4-2) of the Operational Waste Strategy.
- 23.3. Details of refuses have been provided for the detailed commercial and community uses (1x100L bin for Block D and 3x1100L bin for Block N). The quantum of waste and recycling indicated is considered acceptable for non-residential uses.
- 23.4. An Operational Waste Strategy has been submitted which sets out for the detailed element residential waste, recycling and food waste would be collected weekly and adequate storage space and bin/recycling provision has been

provided in accordance with the above guidance. The 4 maisonettes in Block A and 10 houses forming Block T will be serviced by a conventional kerbside collection, as opposed to the communal bins for flatted blocks. All waste stores would be externally accessible and within 10m of the proposed stopping point for the waste collection vehicle.

- 23.5. Storage space for residential and commercial waste for phases 4-10 will be developed at each reserved Matters Application. It is recommended that planning conditions are imposed to reserve the detailed management and maintenance arrangements and secure details for the outline element of proposal. An Operational Waste Strategy and Site Waste Management Plan is recommended to be secured by a planning condition.

24. Contaminated Land

- 24.1 London Plan Policy D11 requires appropriate measures to ensure that development on previously contaminated land does not activate or spread contamination. Local Plan Core Strategy Policies 32 and DMD 66 include similar objectives, requiring all development on land which is or may be affected by contamination to be accompanied by an assessment and effective risk management.
- 24.2 The application is supported by a desktop assessment for the Site. Chapter 10 of the ES provides an assessment of the potential effects of the Proposed Development on ground conditions and the impact of potentially contaminated soil and groundwater on the redevelopment of the Site as well as the effects on ground conditions as a result of the proposed scheme and risks to (future) buildings and structures. The Study considers the historical uses of the Site against the proposed uses. There is evidence of more industrial activity taking place before the Site was developed in the 1950's.
- 24.3 It is reported that there is a moderate/low risk of there being contaminants present including ground-based contamination from various sources due to the former uses of the Site and car parking although it is unlikely that contamination of the water supply will occur.
- 24.4 The Environment Agency has raised no concern in this regard. The desktop study has concluded that a site investigation will be required to establish if there is ground contamination that poses a risk to human health and for this reason, conditions are recommended with regards to remediation/risk management to protect against risks arising from contamination. This is to assess the proposed foundation design with respect to any contamination identified on the Site and set out appropriate design and implementation measures to mitigate the risk.
- 24.5 The Study also identifies that there is a high risk that Unexploded Ordnance (UXO) remains beneath the Site. To minimise this risk, a detailed UXO study and UXO supervision during excavation and intrusive groundworks will form part of the embedded mitigation associated with the Proposed Development and can be secured through a planning condition. A condition relating to disturbance and unexploded ordnance are recommended.
- 24.6 The Environment Agency has raised no objections to the proposed development. The Council's Environmental Health Officer has reviewed the submitted assessment and notes that there is unlikely to be a negative

environmental impact. As such it is recommended that conditions, as recommended be applied in relation to further assessment, remediation measures and verification. Conditions are recommended in relation to unexpected contamination. These conditions are included in the recommendation.

25. Fire Safety

- 25.1. London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 25.2. Proposed changes to the Building Regulations and subsequent publication of the GLA's statement on fire safety were announced in February 2023. This introduced a requirement for residential buildings above 30m in height to be designed and built with two staircases.
- 25.3. In July 2023, the Government announced their intention to require a second staircase for residential buildings above 18m, rather than the 30m threshold previously proposed.
- 25.4. Following the Government's statement in October 2023 reaffirming that a second staircase would be needed for residential buildings above 18m, Blocks A, D, N and K in the detailed element (where the building/or parts of the building exceed 18m) have been revised to incorporate second staircases and balance the associated implications on floorplates and elevations. The requirement for second staircases have already been factored into the outline blocks (B, F, O and P, which are over 30m) and a second stair will be accommodated in all buildings over 18m in the outline element.
- 25.5. This application is submitted with a Fire Safety Statement (April 2024) in support of the application. The Statement details a range of measures including means of escape inclusive of those with reduced mobility, means of warning and details surrounding fire spread control. Access facilities for the fire service and fire safety management and maintenance details are outlined.
- 25.6. A Fire Safety Qualitative Design Review (QDR) has been carried out and accompanies this application. It relates to Block D within the Detailed Element, given the height of core D2 of this building which is over 50m. The QDR does not consider Blocks A, N, K, or T given that the height of these buildings will be less than 50m. It considers fire risk in greater detail alongside the Fire Statement through further consideration of fire hazards and occupancy. It has concluded that the level of risk from fire for Block D is anticipated to remain at least equivalent to residential buildings of a height lower than 50m.
- 25.7. The Health and Safety Executive issued a response in relation to the fire statement dated April 2024. HSE welcomes the provision of a second stair within all residential buildings above 18m and is satisfied with the fire safety design. It is noted the fire statement was helpfully detailed and informative. The London Fire Brigade is a non-statutory consultee. The London Fire Brigade were consulted on this application however did not comment.

- 25.8. A condition requiring the submission of a fire statement with each reserved matters application for the outline scheme has been included (as recommended by HSE) and it is recommended that a planning condition require compliance with the submitted Fire Strategy for the detailed phases in accordance with London Plan Policy D12.

26 Flood Risk and Drainage

- 26.1. London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.
- 26.2. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for major development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage Strategies and maximising the use of Sustainable Urban Drainage Systems (SuDS).
- 26.3. The site is in Flood Zone 1 and is subject to small areas of localised surface water flood risk, which can be addressed through the SuDS Strategy. Blocks O and P are the only blocks with allowances for a single-story basement. Following ground investigation, it is considered that the proposal for a basement in Block O and P may impact perched groundwater flooding locally. A detailed Groundwater FRA Technical Note is therefore required as part of Reserve Matters Application for any phase involving a basement or lower ground floor level, including further groundwater investigations outlined in the condition.
- 26.4. The proposed development overhauls the existing site plan and landscape arrangement. The proposed source control SuDS measures include green roofs, rain gardens and permeable paving and it is recommended the details are secured by condition.
- 26.5. The SuDS Strategy should seek to optimise below ground storage features by maximising above ground storage in ponds, swales and basins. These features can be multifunctional and should be incorporated in the landscape. It is recommended these measures are secured by conditions. Given the above the LLFA have raised no objections to the development and the proposal is acceptable in this regard.

Water Infrastructure

- 26.6. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request conditions be added to any planning permission requiring water network upgrades to accommodate the additional demand to serve the development are completed; or - a development and infrastructure phasing plan is agreed with Thames Water to allow development to be occupied. These conditions have been recommended.

- 26.7. In order to ensure compliance with London Plan Policy SI5, it is recommended to use a planning condition to minimise the use of mains water in line with the Operational Requirement of the Building Regulations (residential development) to achieve mains water consumption of 105 litres or less per head per day.

27. Basement Development

- 27.1 Policy DM18 relates to new Basement development and sets out that the construction of new basements, including in existing dwellings will only be permitted subject to certain criteria.
- 27.2 Basements are proposed in Blocks O and P (ancillary to C3 use), which equates to one floor below ground level with a maximum floor area of 1,606sqm in the outline element. It is recommended that a planning condition is imposed to secure a detailed basement impact assessment prior to the commencement of development on blocks O and P. Any impacts in terms of groundwater are suitably controlled by condition, set out above.

28. Socioeconomics and Health

Jobs and Employment

- 28.1. London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-use phases.
- 28.2. Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 28.3. There are an existing 130 jobs supported at the existing site. This would rise to approximately 167 jobs. There would be economic benefits, including jobs during construction and in the operational phase of the development including spend from future residents. To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that the Shadow S106 agreement secures employment and skills obligations in accordance with the S106 SPD.

Education

- 28.4. London Plan Policy S3 seek to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand. Local Plan Core Policy 8 supports and encourages provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. The proposed development is expected to accommodate approximately 1,010 persons to be 19 or under.
- 28.5. The application proposed a 250sqm nursery / early years education space within Block Q within Phase 4. Based on the most recent data provided by LBE for nurseries, early years providers (including primary schools with nursery classes)

are operating at a deficit of 51 places in the vicinity of the site (500m-1km). This suggests that currently early years provision in the local area is constrained.

- 28.6. It is anticipated there are likely to be the need for 74 nursery places. The development is expected to mitigate the impacts that result from additional early years provision. A new nursery is proposed to be provided in Block Q and, to accommodate an additional 78 spaces. The nursery onsite, is therefore expected to cover the additional demand created by the Proposed Development. There is a small period where additional demand created by the Proposed Development is likely to exceed capacity – 2035 to 2037, while construction of the nursery is still ongoing – in the long run the nursery onsite will mitigate the additional demand.
- 28.7. The nursery provision onsite would be provided at a time when there is expected to be a population uplift, based on the phasing of the development and would overall, exceed the additional demand for places created by the Proposed Development when completed. The recommended condition requires completion of Block Q prior to occupation of any residential units in Phase 4 to mitigate the identified impacts.
- 28.8. In relation to primary schools where catchments overlap with the site boundary the future baseline anticipates that there will be at least 1,875 spare places. Approximately 215 new children between 5 and 10 could require education in the area. Approximately 174 new residents aged between 11 and 16 may require secondary school places. The ES shows there is to be an expected 1,108 spare secondary school places in 2045.
- 28.9. The phased nature of the Proposed Development and the impact of child yield in the initial Phases 0 to 3 (Detailed element) based on the assessment in the ES would have a minimal impact on local schools. Primary and Secondary school place contributions will be considered as part of an education review, secured in the shadow s106, as part of the first RMA (for Phase 4). The purpose of this is to review demand for spaces against local capacity, and then secure the S106 SPD contribution sum (£2,535) for each place needed as identified through the review.
- 28.10. Furthermore, the number of children requiring special education needs and disabilities (SEND) provision as a part of the proposed development is estimated at 22 given the uplift in number of homes on the Site. Using the formula agreed with the Education team, the SEND contribution, is £223,080. This will be paid in one capital instalment, at the point of population uplift, to allow education the spend to bring forward SEND provision and is given weight in the assessment.

Health Impact

- 28.11. London Plan Policy GC3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to an outlined criterion.
- 28.12. London Healthy Urban Development Unit (HUDU) have engaged with the consultants Volterra and the applicant prior to the submission of the planning application. This has included comments provided on the EIA scoping report in November 2021. Volterra has provided information on the existing and proposed housing mix, which has allowed the HUDU to run the Planning Contributions Model to calculate the net population yield and estimate the s106 contribution

needed to mitigate the impact on healthcare. Volterra have clarified that the development includes up to 471 decanted units which will allow existing households to stay on the estate. All secure tenants and resident homeowners will be given the 'right to remain' on the estate, should they wish to do so, although, it is expected that the remaining 324 households/units will relocate elsewhere either through choice or through compulsory purchase (e.g. the non-resident homeowners). Although all 587 secure tenancy households and resident homeowners can be accommodated in the proposed development should all those households wish to remain on the estate.

- 28.13. The Environment Statement (Chapter 13 Socioeconomics) and the Health Impact Assessment concludes that the proposed development will have an impact on healthcare which will be mitigated by a s106 financial contribution to expand existing healthcare infrastructure in the area. There is a recognition based on discussions with the NHS and their representation, that the preference for mitigation is through expansion of capacity off site. This is confirmed in the Environmental Statement of the non- technical summary proposing mitigation as "Specific offsite financial contributions secured through s.106".
- 28.14. The response from HUDU confirms funding would be best directed towards a separate health centre or potentially investment to be directed towards existing premises. New residents will require access to primary, community and secondary healthcare services. The use of the NHS HUDU Planning Contributions Model is the methodology set out in the London Plan 2021 (Chapter 11). HUDU and the ICB have calculated a s106 contribution needed to mitigate the impact of the development on healthcare.
- 28.15. The Model figures assumes figures based on the remaining residents and the new residents which will move into the area and that 471 units will be occupied by existing tenants and also that a significant proportion of residents will move within the area.
- 28.16. As set out the HUDU has advised the intention is to expand existing health facilities - expanding existing facilities can improve sustainability and affordability for the NHS. Mitigation will include a mix of extensions to existing buildings and reconfiguration, at a lower cost than new development. HUDU have set out healthcare facilities within a radius of 1.6km within which would expect capacity to be expanded. The North Central London Integrated Care Board is working with its network of GPs to develop estate strategies which reflect changing clinical strategies, the Fuller Stocktake report focusing on neighbourhoods and the wider shift to moving care close to home. The North Middlesex Hospital is close by and has plans to expand capacity and services, which is referenced in the application.
- 28.17. Taking this approach, HUDU have requested a capital cost of £2,719,401. The shadow s106 seeks to secure this amount at the point of population uplift on the estate (Phase 5). The agreement to pay the capital cost, in a single instalment is considered of significant weight. The timing of the contribution will allow the NHS to deliver the capacity alongside the arrival of the new population. This will enable expansion of the capacity of health infrastructure within the vicinity of the Site.
- 28.18. HUDU also welcome the applicant's commitment to monitor health impacts in the Health Impact Assessment. This will include construction and operational impacts arising from phases of development. In addition, the use of post-occupancy surveys which could identify the demographic profile of new

residents and their changing health and care needs over time as well wider health and wellbeing impacts and requirements are welcomed, and it is recommended these are also secured through the Shadow S106 agreement.

29. Wind and Microclimate

- 29.1 London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind are taken into account to encourage people to spend time in a place. London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate.
- 29.2 The wind microclimate assessment, submitted as part of the ES and the Pedestrian Level Wind Microclimate Assessment, considers the potential wind effects with respect to pedestrian comfort and safety during demolition and construction of the development and after its completion. The assessment follows the Lawson Criteria.
- 29.3 Minor adverse impacts were found to the uppermost central balcony on Block A and rooftop level seating to K and N in the detailed element. With the inclusion of wind mitigation measures, notably screening, hedging and tree planting there would be a negligible impact. It is recommended these mitigation measures are secured by condition.

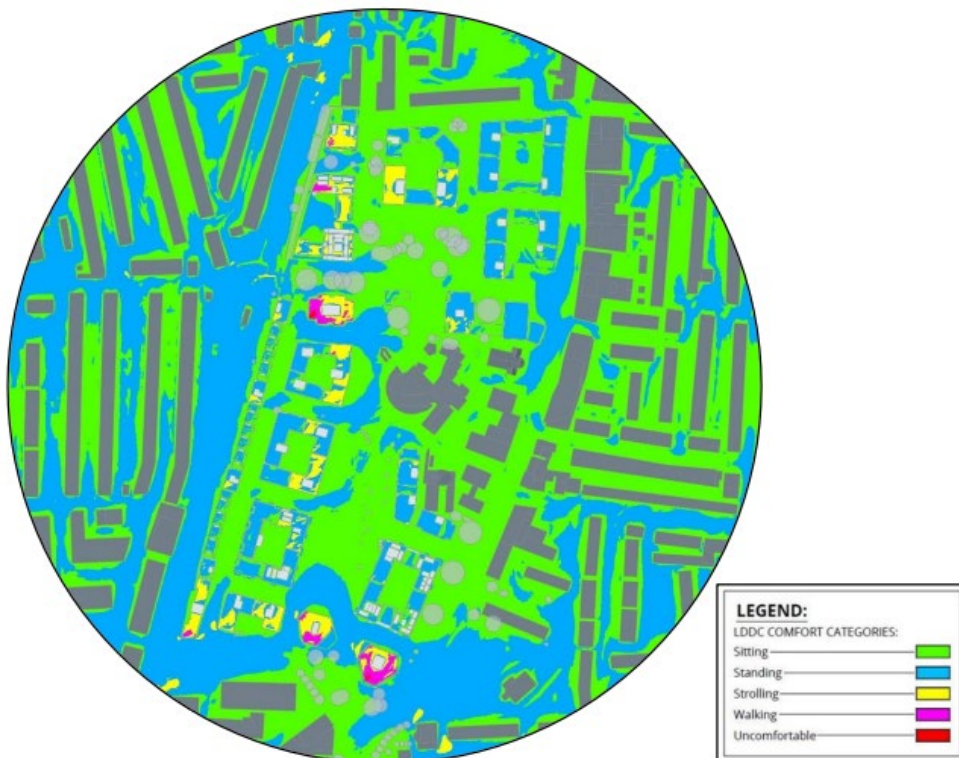


Image: Proposed Development (detailed scheme) + outline scheme) with the existing surrounding buildings and existing landscaping; - Ground Level (Annual)

**without mitigation*

- 29.4 There would be areas around and on the outline Blocks, notably F, P and O with unsuitable wind conditions and expected strong wind exceedances ('uncomfortable' in exceedance of 10m/s). These will be tested at the detailed RMA stage to ensure all locations would have suitable wind condition for the intended use.
- 29.5 It is therefore recommended conditions are attached to the permission to ensure that appropriate additional microclimate assessment work takes place and suitable mitigation is delivered as part of the scheme for the outline phases. Subject to this, officers consider that the proposed scheme would result in an acceptable wind environment.

30. Security and Safety

- 30.1. London Plan policy (D11 Safety, security and resilience to emergency) Part C states that development should include measures to design out crime. The policy states that these measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
- 30.2. The applicant engaged in discussions with the Design out Crime Officer at the application stage and these discussions have informed the design. The Design out Crime Officer has been consulted on the application and has confirmed a condition to achieve Secure by Design accreditation. A condition is recommended to ensure that details of security measures are submitted for approval and that Secure by Design accreditation is achieved prior to the occupation of the development.
- 30.3. Furthermore, the masterplan layout carefully balances the placement of blocks, consolidated green space, into a cohesive layout that knits into the surrounding urban fabric. A street-based approach with perimeter blocks creates a legible proposal with a strong public front and secure private amenity and is considered to create a safer environment.

31. Equality Statement

- 29.1 London Plan Policy GG1 of the London Plan highlights the diverse nature of London's population and underscores the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities.
- 29.2 Due regard has been given to the Public Sector Equality Duty contained in section 149 of the Equality Act 2010, which sets out the need to eliminate unlawful discrimination, harassment and victimisation and to advance equality and opportunity and foster good relations between people who share protected characteristics and people who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 29.3 The Council should have had due regard to the impact on the residents with protected characteristics. The Public Sector Equality Duty contained in the

Equality Act is not a duty to eliminate discrimination but requires that where there is a negative, consideration be given to clear negative impacts and the extent to which they can be mitigated.

- 29.4 An Equalities Impact Assessment (Volterra) has been submitted in support of the application. The proposals follow the principles set out in the London Plan and the Mayor's Good Practice Guide to Estate Regeneration would be met in terms of the right to remain, a fair deal for leaseholders and public consultation and engagement. One of the key aims of the regeneration proposals is to ensure that residents are able to remain on the estate throughout the construction of the scheme. The phasing and decant strategy will ensure this, with a single move offered to existing residents.
- 29.5 The proposal will support the delivery of a range of socio-economic and regeneration outcomes, with potential positive impacts on residents with protected characteristics arising from the provision of new homes, a net gain of homes in the area, including at social rent, an increase in the number of family homes that will assist in reducing overcrowding.
- 29.6 The proposed new residential accommodation meets inclusive design standards and 10% of the new homes will be wheelchair accessible. The proposal will also provide blue badge spaces which will be allocated based according to need. The development will also secure cycle parking in accordance with the London Design Cycling Standards to enable cycle parking for different user groups i.e., wider cycle parking spaces to accommodate non-standard sized cycles.
- 29.7 The phasing allows for a Commercial Relocation Strategy. This seeks to support local businesses and reduce the overall impact of regeneration on local businesses and includes relocating businesses within the application site within Block N where space is available, and the use is compatible with the regeneration proposals. The makerspace within Angel Yard will be relocated within Block C and E with reduced rent rates. These mitigation measures to existing commercial users will serve to limit any impacts and ensure businesses, organisations and employees are supported through the process.
- 29.8 With the mitigation, the equality impact reduces from substantial adverse effect to a minor adverse impact on the general population as well as the priority groups. The appropriate level of consultation with the public and Council consultees has been carried out. The Applicant has also carried out engagement with nearby residents and occupiers prior to the submission of the planning application. Overall, the proposed development would not result in adverse impacts upon equality or social cohesion.

32. Shadow S106 Heads of Terms

- 32.1. The NPPF requires that planning obligations must be:
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and,
 - (c) Fairly and reasonably related in scale and kind to the development.
- 32.2. Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting

planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.

- 32.3. The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. The Council's Infrastructure Funding Statement (2019/2020) sets out planned expenditure over the current reporting period (2020/21).
- 32.4. In setting out financial contributions to be secured through a S106 Agreement, the applicant has prioritised the delivery of affordable housing across the proposed development. As a consequence, it is stated that without compromising the viability of the applicant being in a position to bring forward the proposed development, the applicant is not in a position to address all identified requirements of the adopted Enfield S106 Supplementary Planning Document (SPD). The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within a S106 Agreement:

Affordable Housing

- Accommodation schedule in line with number, mix and tenure of affordable homes in detailed phases
- Provision of Affordable Housing in accordance with affordable housing tenure split for detailed phases
- Phasing and minimum replacement social rent provision Affordable housing delivery strategy for outline phases (4-10)
- Provision of minimum 19% percent of family sized homes
- Number and tenure split outline phases
- Enfield Nomination rights
- Phased decant and re-provision requirements for Phases 0-5 (the decant Phases)
- No net loss of affordable floorspace/hab rooms per phase
- Minimum baseline affordable housing provision across the entire site
 - 53% of the total housing proposed by habitable room (49% by unit)
 - social rent accommodation to equate to 62% of the overall gross affordable housing by unit
- Minimum provision of family housing

Housing tenure and affordability

- Social rent housing at no more than target social rent
- Intermediate shared ownership eligibility - households on incomes below £90,000 and with requirement for the shared ownership homes to be marketed to households on the following income bands for 3 months before cascading to the London-wide £90,000 maximum income level if unsold:
 - these lower income levels:
- one-bedroom homes: £40,000;
- two-bedroom homes: £40,000; and
- three-bedroom home: £60,000.
- Eligibility requirements for the shared equity units are in line with the London Plan maximum income threshold (maximum £90,000). Shared

Equity Homes to meet the Shared Ownership requirements in that they should be restricted to households on incomes of income below £90,000.

- Overall housing costs, including service charges do not exceed 40% of the maximum household income. In line with the London Plan, a range of income levels should be provided for below the maximum £90,000. In the event the shared equity homes are not taken up then these homes should flip to intermediate shared ownership.
- All intermediate housing costs (including rent, mortgage, service charge) to not exceed 40% net household income.

Viability Review Mechanisms

- An updated viability appraisal with actual costs and values replacing estimated values as the scheme progresses, subject to inputs being fixed:
 - Benchmark Land Value (based on EUV)
 - Target return
- Early-Stage Viability Review Mechanism
- Mid-Stage Viability Review Mechanisms – there should be at least three Mid-Stage reviews. To be on each RMA or at fixed points in the delivery programme
- Late-Stage Viability Review Mechanism
- The review policy caps should be set at 50% of the net additional units being provided as affordable housing (plus the re-provision of the existing affordable homes)
- Submission and approval of an Additional Affordable housing scheme (should viability review mechanisms show a surplus in value and potential for additional affordable)
- Increase to affordable housing minimum in the case of any surplus identified on early and mid-stage reviews, with a financial contribution calculated where there is a surplus on late review

Phasing

- Occupation of market housing restricted to ensure minimum baseline level of affordable housing maintained throughout the development.
- Submission of Approved Affordable Housing Scheme prior to the implementation of each Reserved Matters Application

Workspace

- At least 10% of the proposed workspace at a 25% reduction to prevailing market rates and on flexible terms for 15 years from first occupation of each unit
- Workspace Management Plan
- Strategy to assist with the relocation of existing business within the development to permanent locations within the development, to be submitted with relevant Reserved Matters Application

Social Infrastructure

- Re-provision of existing social infrastructure floorspace on site - Fore Street Living Room Library in the new Civic hub prior to demolition of existing facility

- Civic Hub Business Plan
- Submission and approval of details relating to the new community/ civic use facility in terms of agreeing specification / shell and core
- Completion of the new community/ civic use prior to occupation of residential homes on the latter (next) residential phase
- On site facility at peppercorn rent for use as Police Accommodation. Fit out the Police Accommodation
- Use of 2 parking spaces for emergency vehicle use
- Community access to MUGA as Part of Phase 4

Nursey

- Provision of nursery to accommodate demand in uplift in homes (in Phase 4).

Health

- £2,719,401 contribution for the provision of expanded health services within the vicinity of the development at the point of population uplift

Public Open Space and Play Provision

- Delivery of Open Space and Access Management for open spaces
- Unrestricted public access to public realm, subject to normal justified exceptions
- £500,000 improvements to Florence Hayes
- Estate Management and maintenance plans
- Delivery of public space in terms of quantum linked to occupation of market homes in a certain phase
 - The Meadows (min. size).
 - The Northern Grove public park (min. size)
 - The community / civic square on Fore Street
 - The school square
- Community access for MUGA and management plan for operation and use

Biodiversity

- 56,068 for SAMMS - £45.40 per unit applied to uplift in homes
- £450,000 contribution for Suitable Alternative Natural Green Space (SANG) – Improvements to a) Pymmes Brook Trail and b) Pymmes Park.

Design

- Architect retention scheme
- Design monitoring costs (detailed)
- Design monitoring costs (outline)
- Design Review (outline phases)

Railway Pedestrian footbridge

- Delivery of pedestrian/cycle footbridge linked to the occupation of adjacent blocks

Education

- £223,080 - education per dwelling (£2,535) and multiplied by 4 (£10,140) on the basis of SEND at the point of population uplift
- To review Primary and Secondary school place contributions as part of Education review - £2,535 for each place needed as identified through the review at the point of net new units.

Employment and Skills

- An Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, reporting and associated targets. – propose 1 apprenticeship for every £3million spend on the build
- Request 25% local labour and a minimum of 10% local spend on materials.
- Scope to work with the developer to discuss employer events, school engagement and other interventions further down the line

Energy

- £153,457 Carbon Offsetting contribution for Phases 0-4.
- Connection to District Energy Network. Measures to ensure connection to a district energy network to supply low carbon heat.
- Carbon offsetting for Reserved Matters Phases at £95 a tonne x 30 years
- Monitoring ('Been Seen') GLA Monitoring Portal.

Heritage

- £500,000 financial contribution to Heritage Enhancement Fund and public realm improvements
- Preparation of Fore Street Public Realm Strategy (including heritage interpretation)
- Relocation of Gilpins Bell sculpture

Transport

- £389,359 contribution for singlaised crossing over Sterling Way
- CPZ consultation contribution at commencement
- CPZ implementation contribution at conclusion of consultation
- Travel Plans (residential & non-residential)
- Travel Plan monitoring
- Parking permit restrictions
- Sustainable Transport Contributions (Phases 0-3)
- Sustainable Transport Contributions (Phases 4-10)
- Highway works (phases 0-3) including College Close/ Sterling Way Junction, College Gardens, Snells Park, Langehedge Land and Langhedge Close
- Highway works (phases 4-10)

Other

- LBE Management fee (maximum 5% of value of financial contributions and £350 per non-financial obligation).

- Payment of legal costs
- Index linked contributions.

32.5 This is an application by the Council and the Council is the determining local planning authority on the application. However, it is not possible legally to bind the applicant via a S106 legal agreement. It has therefore been agreed that as an alternative to this a Memorandum of understanding between the proper officer representing the applicant and the proper officer as the Local Planning Authority will be agreed subject to any approval.

33. Community Infrastructure Levy (CIL)

33.1. Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.

33.2. Enfield adopted their local CIL Charging Schedule in April 2016. The site falls within the 'Lower Rate Eastern Zone' for Community Infrastructure Levy Residential Zones. As such, for Class C3 residential uses, CIL is charged at £40 per square metre. For retail, financial and professional services including betting shops, restaurants and cafes, drinking establishments and hot food takeaways CIL is charged at £60 per sqm across the borough. All other uses (including offices, industrial, hotels, leisure facilities, community and other uses) have a CIL liability of £0 per square metre.

33.3. In the London Borough of Enfield the Mayoral CIL rate is £60, plus indexation, per sqm of net additional floorspace for all development other than developed used wholly or mainly for health and education.

33.4. Credits for demolition and social housing relief can be used to reduce the amount of CIL payable.

33.5. In line with the applicant's CIL liability form, in the estimated Detailed Phases amount of MCIL owed is approximately £13,300.36. The amount of Enfield CIL owed is £38,523.33.

34. Conclusion and Planning Balance

34.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning applications must be determined in accordance the development plan, unless material considerations indicate otherwise.

34.2. The Council has committed to an ambitious house building programme to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This is captured in the Council's 2020-2030 Housing and Growth Strategy.

34.3. The scheme will enhance the social infrastructure in the area through the provision of community facilities and S106 contributions towards healthcare and education. It will provide new civic hub, nurse and community space. It is considered that most of these obligations would be necessary requirements for any development of a similar nature and therefore these benefits are only afforded a moderate weight.

- 34.4. The proposals would provide new / modern employment space and increased employment, at discounted rates helping to achieve the aims of the development plan policies. The renewal of the high street will introduce modern retail units with services reflecting the diverse needs of the community and will contribute substantially to the overall health, vitality and viability of Fore Street and the wider Angel Edmonton District Centre.
- 34.5. The residential-led development would provide 2,028 new residential units making a significant contribution to the Borough's housing target. 1,013 (53%) of the homes will be affordable (based on hab. rooms), exceeding the London Plan requirement of 50%, including, 625 homes (62% by unit) being provided at much needed Social Rent. Furthermore, the Detailed Phases will deliver 575 new units, 91% of which are affordable and 58 wheelchair adaptable units. The Council cannot currently demonstrate a five-year housing land supply (the 'tilted balance'). Given the Borough's high housing target and the identified need for rented affordable housing, the overall housing package is afforded significant weight.
- 34.6. An appraisal of the scheme has been carried out by an Independent Viability Assessor for the Council. Whilst the scheme benefits from grant, the appraisal concludes that the scheme produces a deficit. Despite this, the scheme exceeds the policy requirement of affordable housing and has agreed to early, mid and late-stage review mechanisms to be included in the s106 as well as other financial mitigation and infrastructure. It is considered that the amount of affordable housing on the Site has been maximised and therefore accords with Development Plan in this regard.
- 34.7. The proposed site layout would provide new public parks and civic square amongst other public realm, vehicular/cycle/ pedestrian connections to Fore Street and safeguarding and improving potential east-west links over the rail line. Proposed transport improvements for the area, include a pedestrian crossing to the A406, pedestrian bridge over the railway line and improved connections to Fore Street. Contributions towards which, would be secured through S106 contributions and infrastructure levy.
- 34.8. The heights of some of the proposed buildings exceed the maximum recommended height for this Site set in the DMD and Draft Local Plan. Whilst the heights of the proposed buildings exceed the heights indicated it is considered that the proposed massing within these plots presents an acceptable design solution which responds to the constraints of the Site. The departures are also considered necessary to make efficient use of the Site and secure the delivery of a range of public benefits.
- 34.9. The likely functional and environmental impacts of the proposed tall buildings are considered acceptable. The submitted parameters and design code will facilitate the delivery of tall buildings of sufficiently high-quality to justify their proposed height and form and their likely effects on surrounding townscape. For the detailed Blocks, the architectural detailing, proposed materials, and landscaping will contribute to a high standard of design quality. The scheme meets the assessment criteria for tall buildings set out in London Plan policy D9. For these reasons, it is considered that the proposed buildings are acceptable in urban design terms and that building heights in excess of those recommended can be supported on this instance.

- 34.10. The proposals would cause very high adverse harm to the Joyce and Snells Estate through its loss and redevelopment. Having regard for the scale of harm and the significance of this NDHA, moderate weight is given to this harm. Harm has also been identified from the proposals resulting in less than substantial harm to the significance of a number of designated. National guidance requires great weight to be applied to the preservation of heritage assets. Even though the impact on the heritage assets must be afforded significant weight under the NPPF, it is considered that the significant benefits of the contribution towards housing, affordable housing, employment and public transport would outweigh this harm. Overall, the identified public benefits of the scheme are considered to outweigh the less than substantial harm to the character and appearance of the adjoining conservation areas. These benefits are also considered to outweigh the less than substantial harm to the Grade II listed and non-designated heritage assets (locally listed buildings). Having regard to Section 16 of the NPPF the harm identified is considered to be outweighed significantly and demonstrably by the public benefits. The scheme would therefore accord with Paragraph 11d of the NPPF.
- 34.11. The proposed homes would be high-quality and future residents are anticipated to enjoy an acceptable level of amenity (in terms of aspect, size of homes, open space, play space, outlook/privacy, daylight and sunlight, noise, wind conditions, air quality and overheating). There are instances where internal daylight and sunlight standards are not achieved, however a degree of flexibility is required in considering a regeneration scheme of this nature and the need to optimise the site's capacity. The private and shared amenity spaces are considered to provide a good level of external amenity space and play space will be in accordance with the required standards. Overall, the development will provide a satisfactory residential environment for future residents.
- 34.12. The scheme will significantly improve existing areas of public open space on site and off site whilst providing a net uplift. The new areas of public open space would create high quality spaces that will be accessible by members of the community. There are a number of mature trees on site which are to be retained. In addition, new trees would represent an uplift in tree cover and when considered alongside the ecological planting would represent a significant enhancement in biodiversity value across the site.
- 34.13. The proposal will result in a degree of harm to the residential amenities of properties by reason of loss of daylight and sunlight. The overall level of transgression is not considered proportionately high although in some instances is severe. The assessment has been made on maximum parameters and it is expected this harm can be further mitigated. Whilst some inevitable loss/harm would be expected due to the underutilised nature of parts of the site the level of harm is acknowledged and weighed in the overall balance of the proposal.
- 34.14. The proposals will achieve an acceptable performance against the London Plan and Core Strategy policies on Energy and Sustainability. A new energy centre is proposed, and the development would connect to the DEN. Flood risk is low and likely environmental impacts, including noise, air quality, wind and microclimate, waste and recycling and land contamination, basement impact and archaeology could be made acceptable by use of planning conditions.
- 34.15. Officers have taken full account of the findings of the submitted Environmental Statement and into account the responses to consultation and other relevant information in accordance with EIA Regulations, and other relevant legislation

and guidance. The findings of the ES are referred to, where relevant, throughout the report. If planning permission were to be granted, satisfactory mitigation measures identified in this report, could be secured by planning conditions and/or through the Shadow s106 planning obligations.

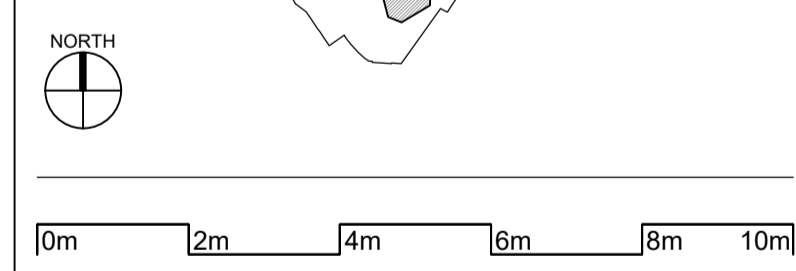
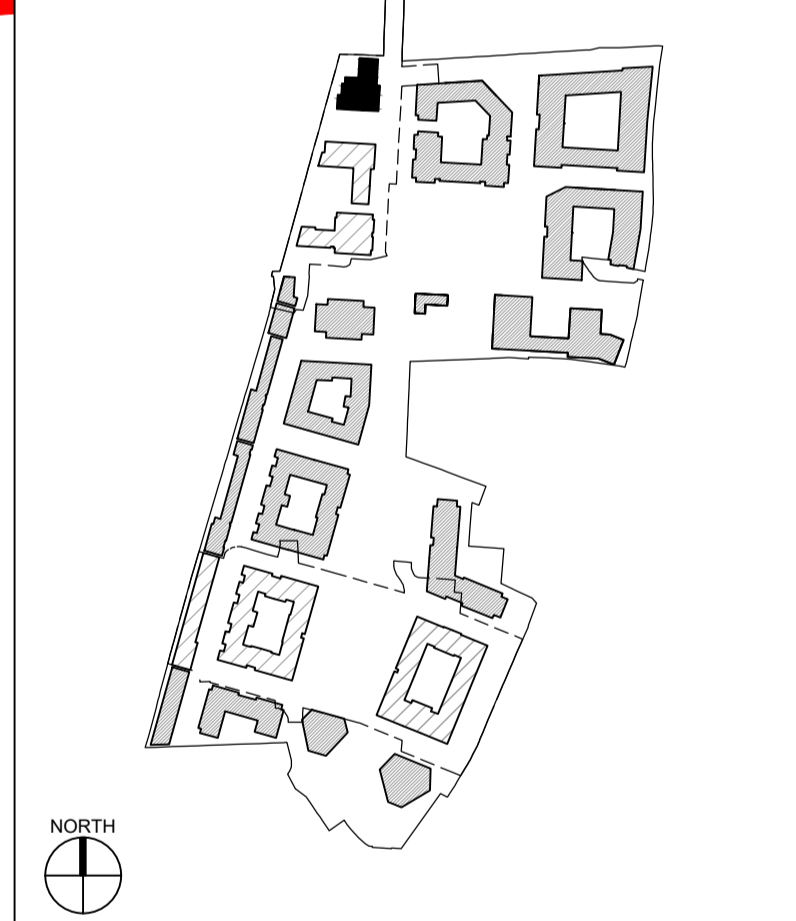
- 34.16. The proposed scheme would provide an accessible and safe environment and significant additional affordable homes. Subject to securing the delivery of various features and provisions identified in this report, the proposed scheme would have a positive equalities impact.
- 34.17. Overall, the principle of the development of the site, in terms of the uses proposed is in accordance with the relevant Development Plan Policies as well as other material considerations. The scheme will secure the delivery of a range of public benefits including the provision of additional homes (including affordable, accessible, and family housing), provision of significant public realm enhancements, provision of a new civic square, provision of a new public park, provision of new and enhanced pedestrian and cycle connections across the site, biodiversity enhancements and the provision of energy efficient homes.
- 34.18. Taking the above considerations into account, the proposals are in substantial accordance with the development plan policies, national and other guidance and the application is recommended for approval, subject to conditions and the shadow s106.

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- LEGEND**
- Hybrid Application Site Boundary
 - - - Extent of Development for Detailed Application
 - Proposed FFL
 - DR1** Dry Riser Inlet
 - DR** Dry Riser
 - WRI** Wet Riser Inlet
 - WR** Wet Riser
 - ELSSR** Electrical Life Safety Switch Room
 - EISR** Electrical Intake/Switch Room
 - EL** Evacuation Lift
 - FFL** Firefighting Lift
 - Main Entrance
 - Secondary Entrance
 - Home Entrance

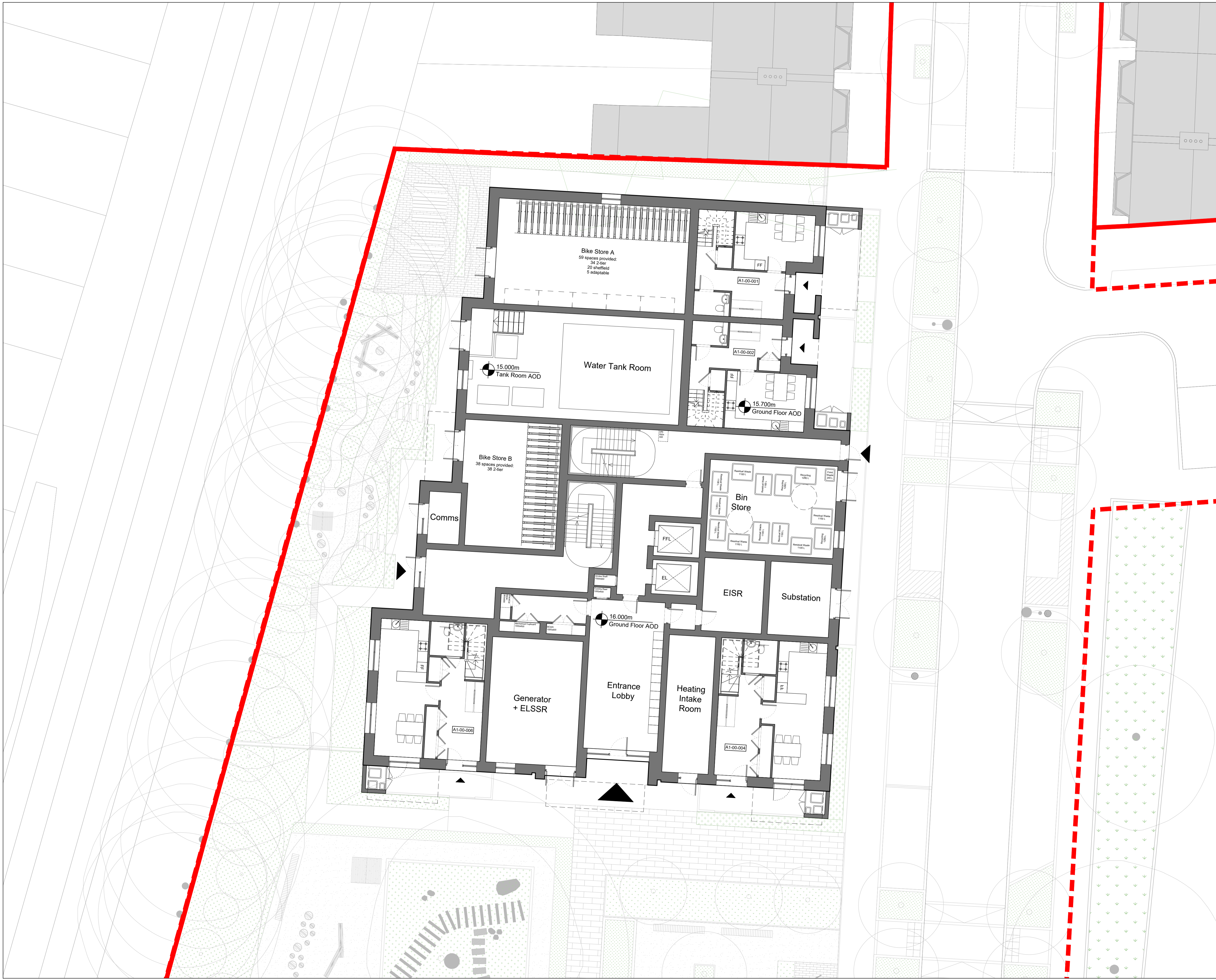
- KEY PLAN**
- Block Location
 - Detailed Blocks
 - Outline Blocks



PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block A - Level 00
 Proposed General Arrangement Plans

drawing number
ENF-JSE-HTA-A-BA-DR-PL-0100 revision
PL1
 scale @ A1 originated by
 1:100 DRE project code
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1 East Elevation
1 : 200



2 South Elevation
1 : 200



3 West Elevation
1 : 200



4 North Elevation
1 : 200

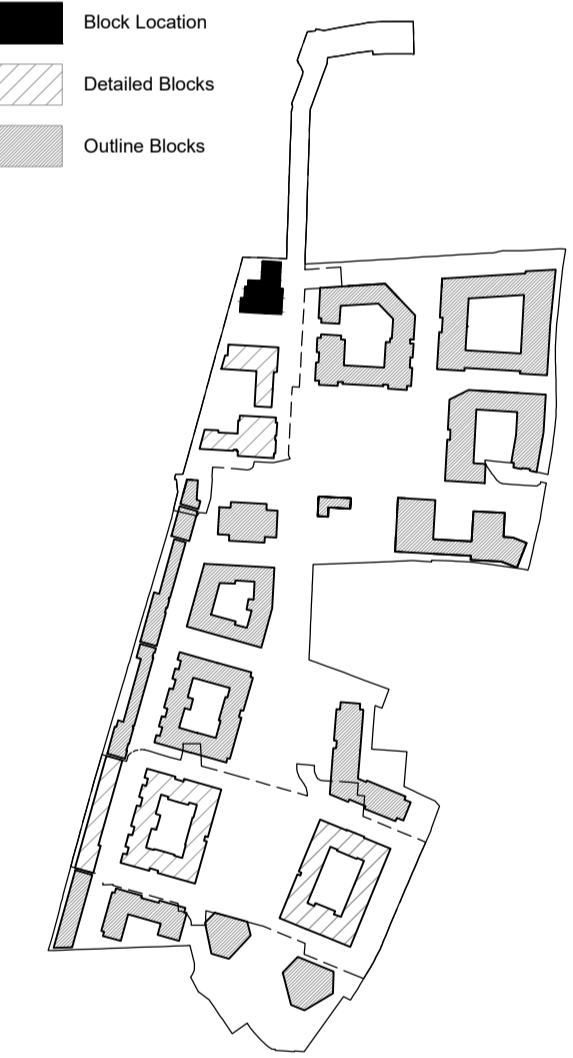
LEGEND

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B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		
Reconstituted Stone:		Entrances:	
S1	Dark Red/Brown	▶	Main Entrance
S2	Red/Brown	▶	Secondary Entrance
S3	Buff	▶	Home Entrance
S4	Red		
S5	Light Red		

BLOCK KEY PLAN

ESTATE KEY PLAN

- Block Location
- Detailed Blocks
- Outline Blocks



PL1 05.04.24 TCO Planning Issue
Rev Date Drawn Description
Status
PLANNING ISSUE
client / project
LB Enfield
Joyce & Snell's Estate Regeneration
drawing title
Block A
Elevations

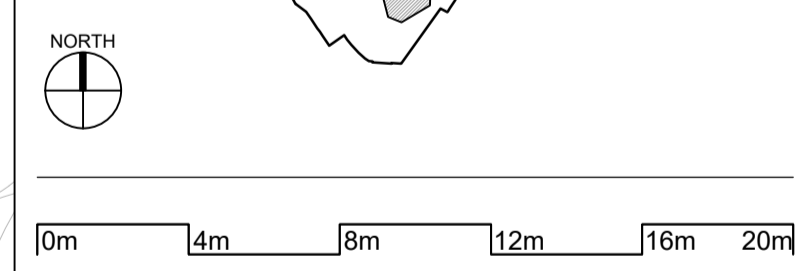
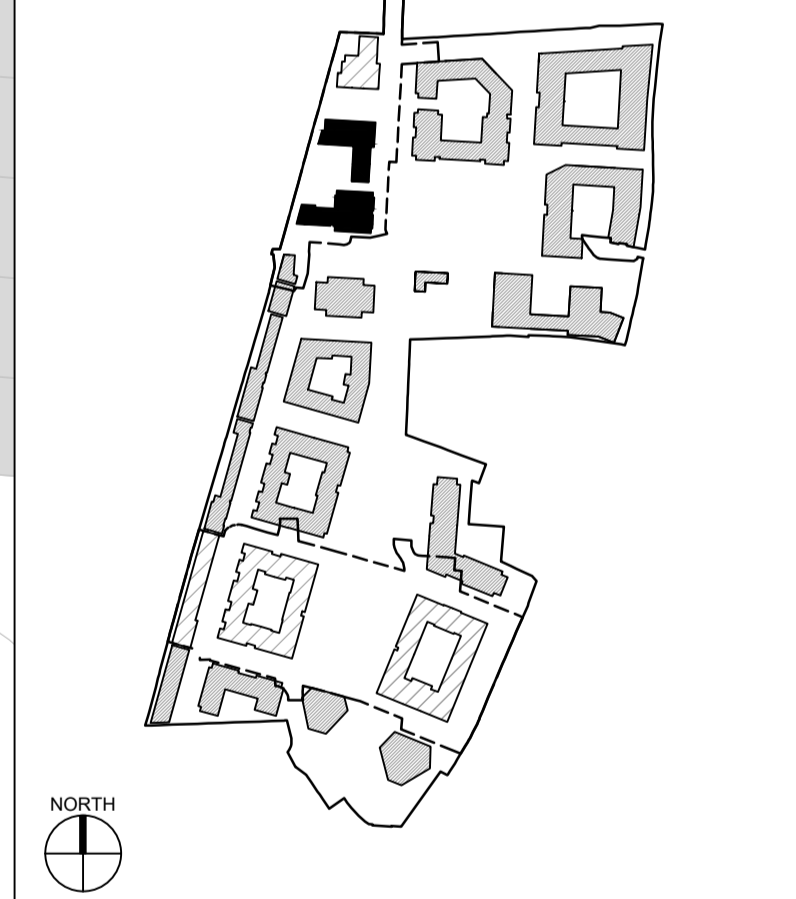
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- KEY PLAN**
- Block Location
 - Detailed Blocks
 - Outline Blocks



PL1 05.04.24 TCO Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block D - Level 00
 Proposed General Arrangement Plans

drawing number
ENF-JSE-HTA-A-BD-DR-PL-0100 revision **PL1**
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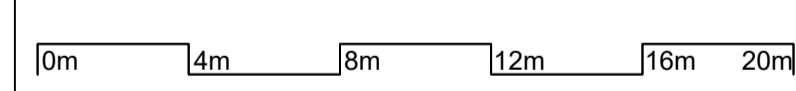
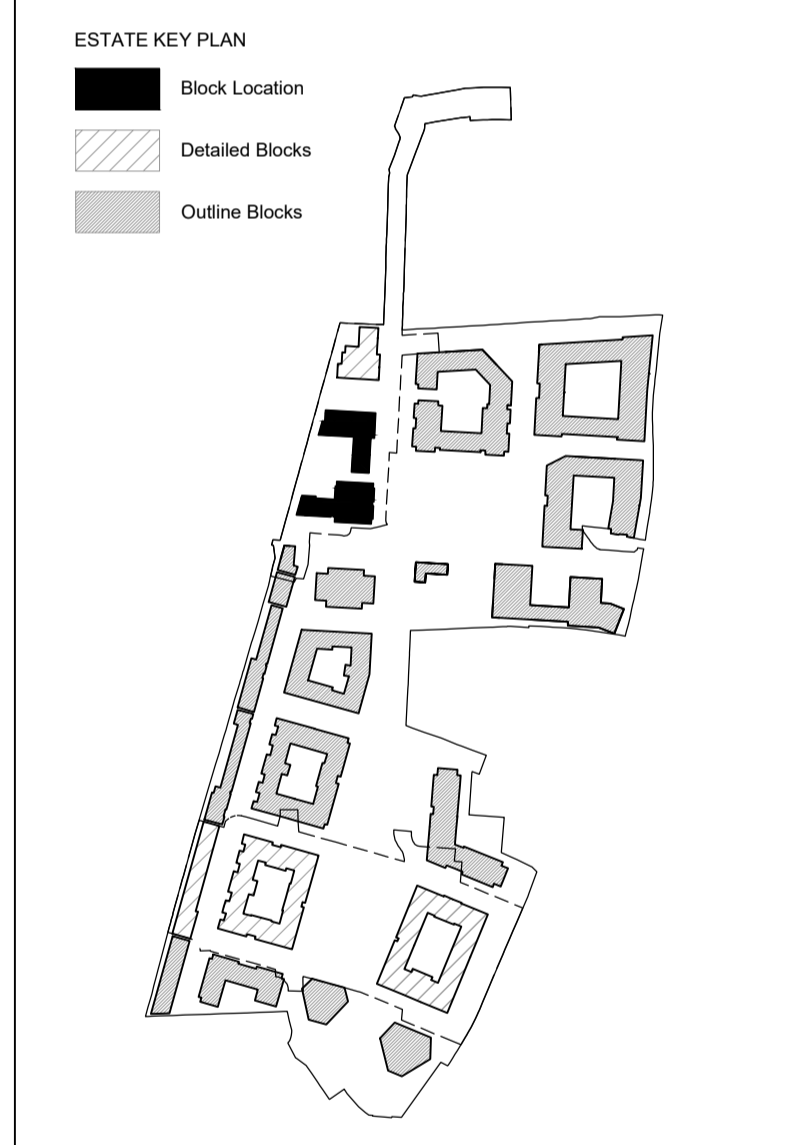
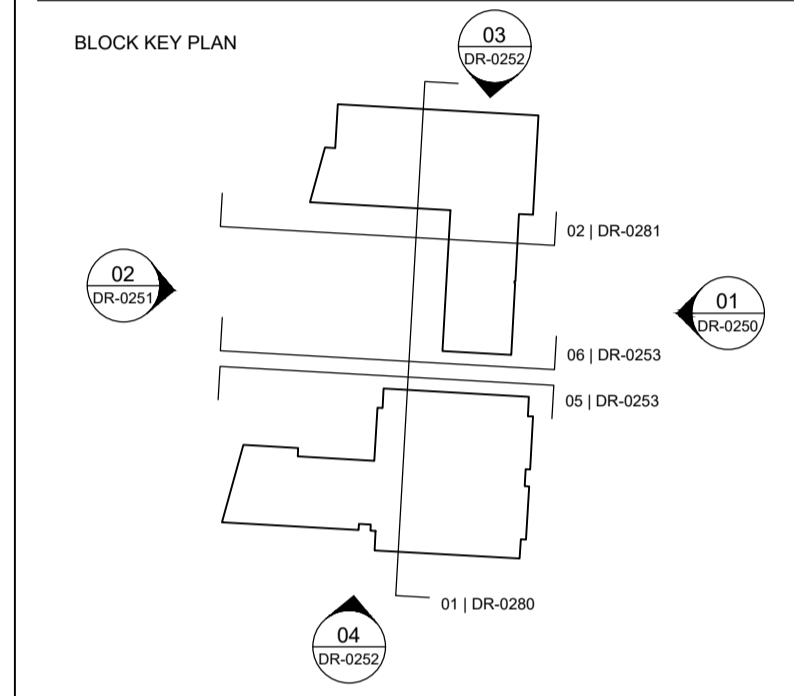
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LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



PL1 05.04.24 TCO Planning Issue
 Rev Date Drawn Description
 STATUS
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block D
 East Elevation
 drawing number
 ENF-JSE-HTA-A-BD-DR-PL-0250
 scale @ A1
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1 East Elevation
 1 : 200

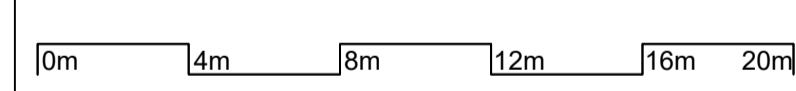
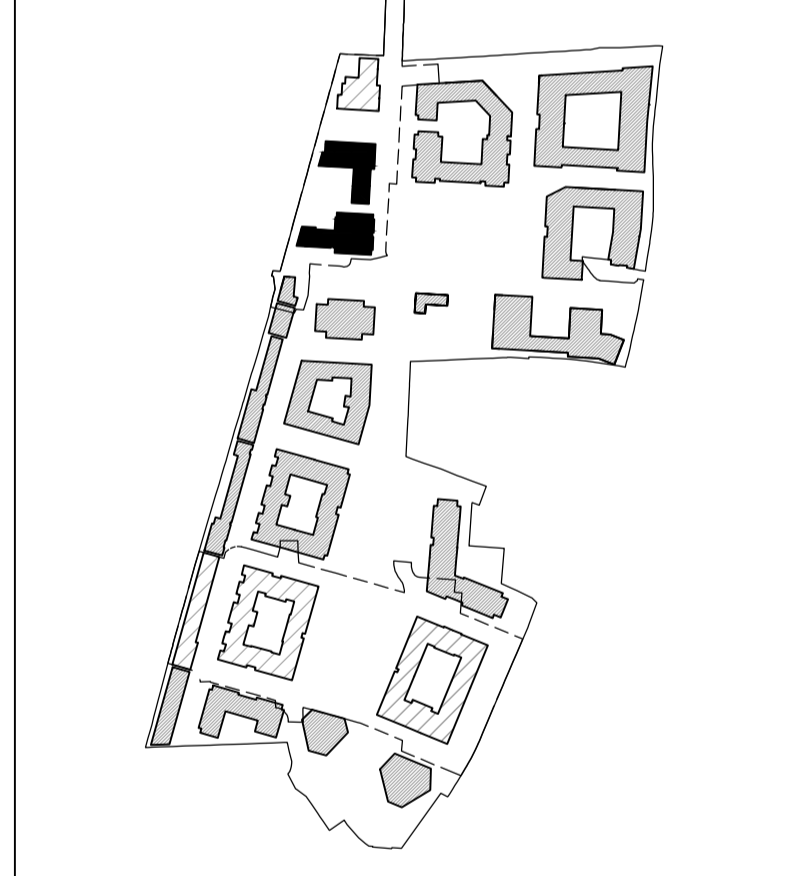
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LEGEND	
Brick:	Metal:
B1 Red	M1 Red/Brown
B2 Brown	M2 Grey
B3 Dark Brown	M3 Light Grey
B4 Buff	M4 Red
B5 Red/Brown	
B6 Light Grey	
B7 Light Red	
Reconstituted Stone:	Entrances:
S1 Dark Red/Brown	▶ Main Entrance
S2 Red/Brown	▶ Secondary Entrance
S3 Buff	▶ Home Entrance
S4 Red	
S5 Light Red	

BLOCK KEY PLAN

ESTATE KEY PLAN	
■ Block Location	
▨ Detailed Blocks	
□ Outline Blocks	



PL1 05.04.24	TCO	Planning Issue
Rev Date	Drawn	Description
PLANNING ISSUE		
client / project		
LB Enfield		
Joyce & Snell's Estate Regeneration		
drawing title		
Block D		
West Elevation		
drawing number		
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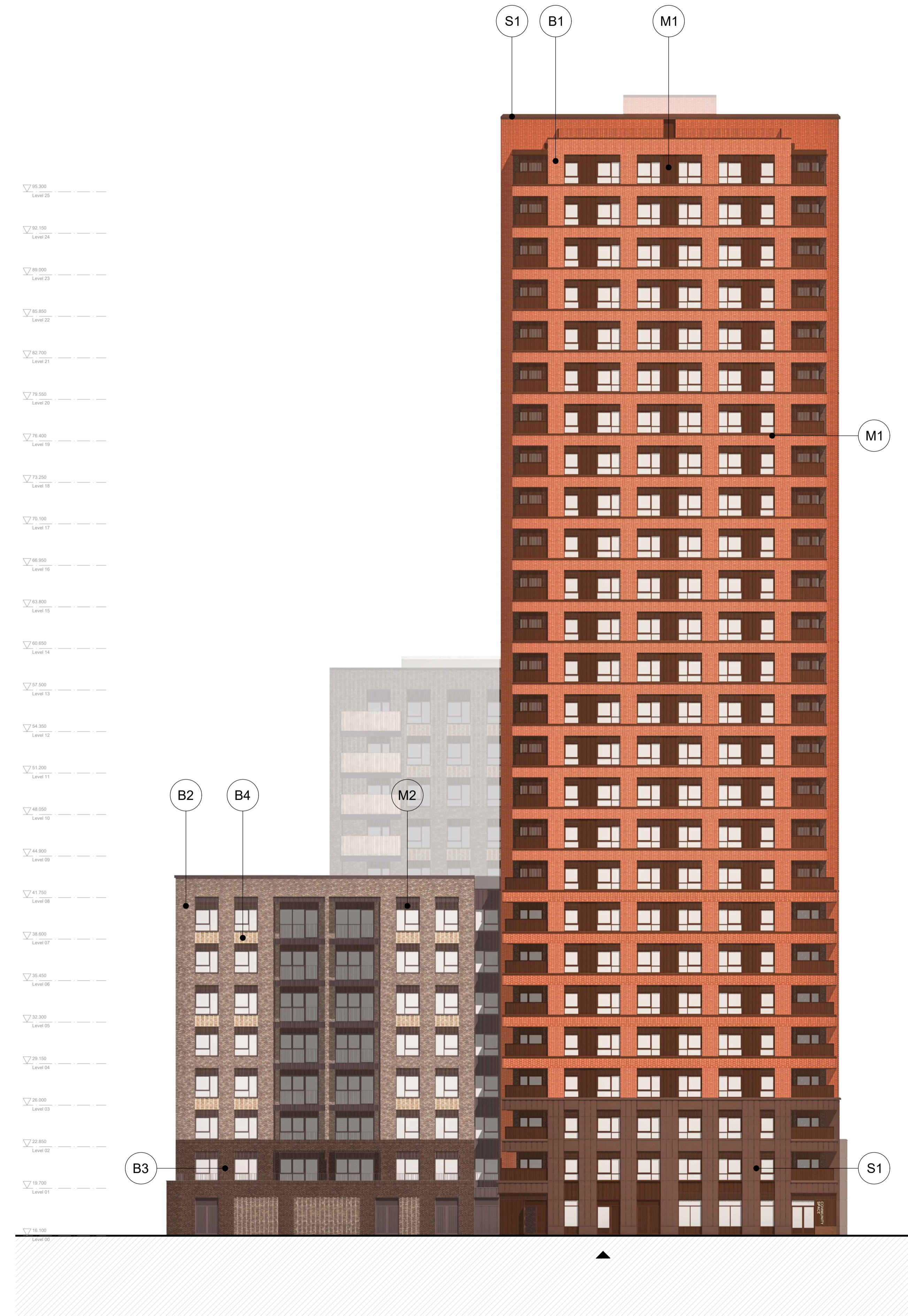
2 West Elevation
1 : 200

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3 North Elevation
1: 200

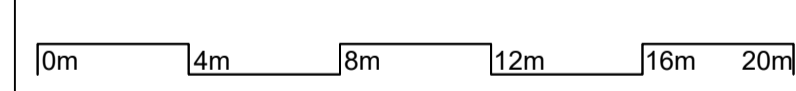
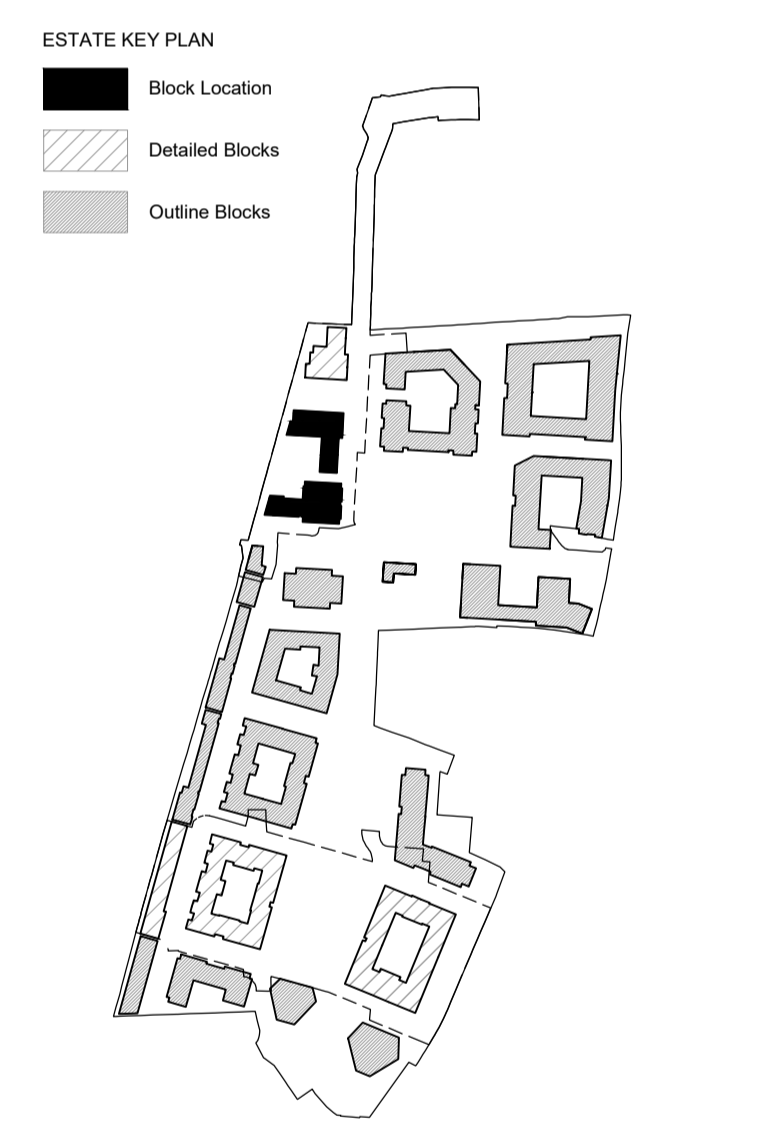
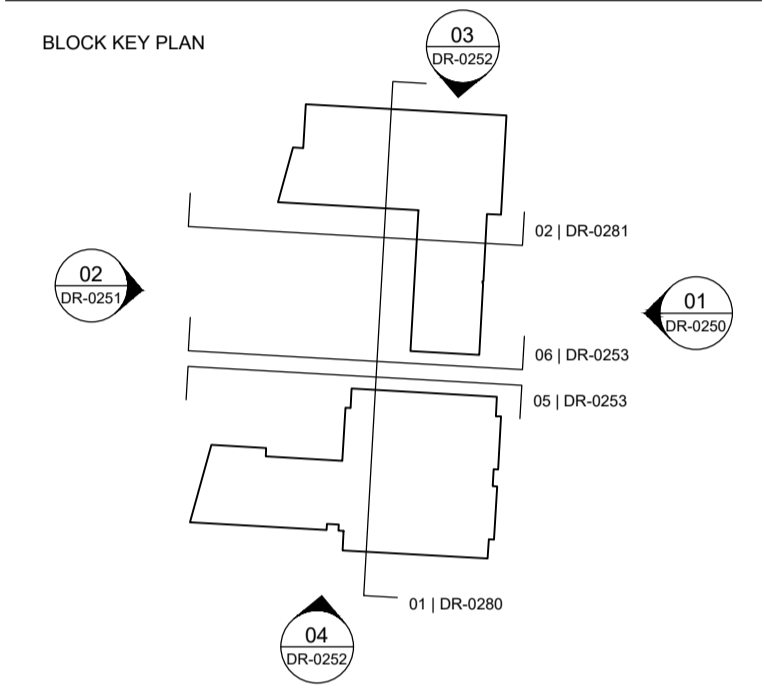


4 South Elevation
1: 200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



PL1 05.04.24 TCO Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 Client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 Drawing title
Block D
 North and South Elevations

drawing number
 ENF-JSE-HTA-A-BD-DR-PL-0252
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revision
PL1
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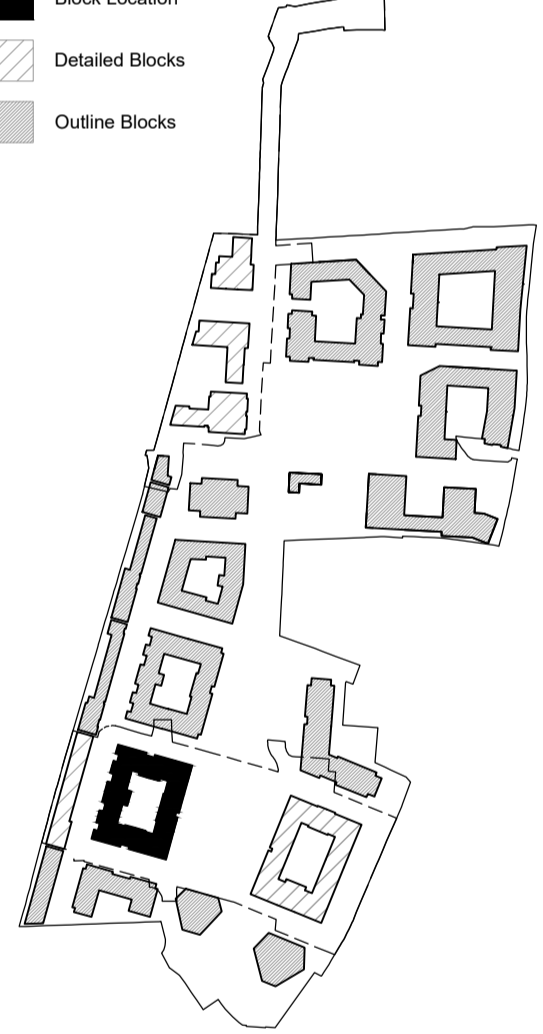
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KEY PLAN

- Block Location
- Detailed Blocks
- Outline Blocks



NORTH



10m 4m 8m 12m 16m 20m

PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status

PLANNING ISSUE

client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration

drawing title
Block K - Level 00
 Proposed General Arrangement Plans

drawing number
 ENF-JSE-HTA-A-BK-DR-PL-0100

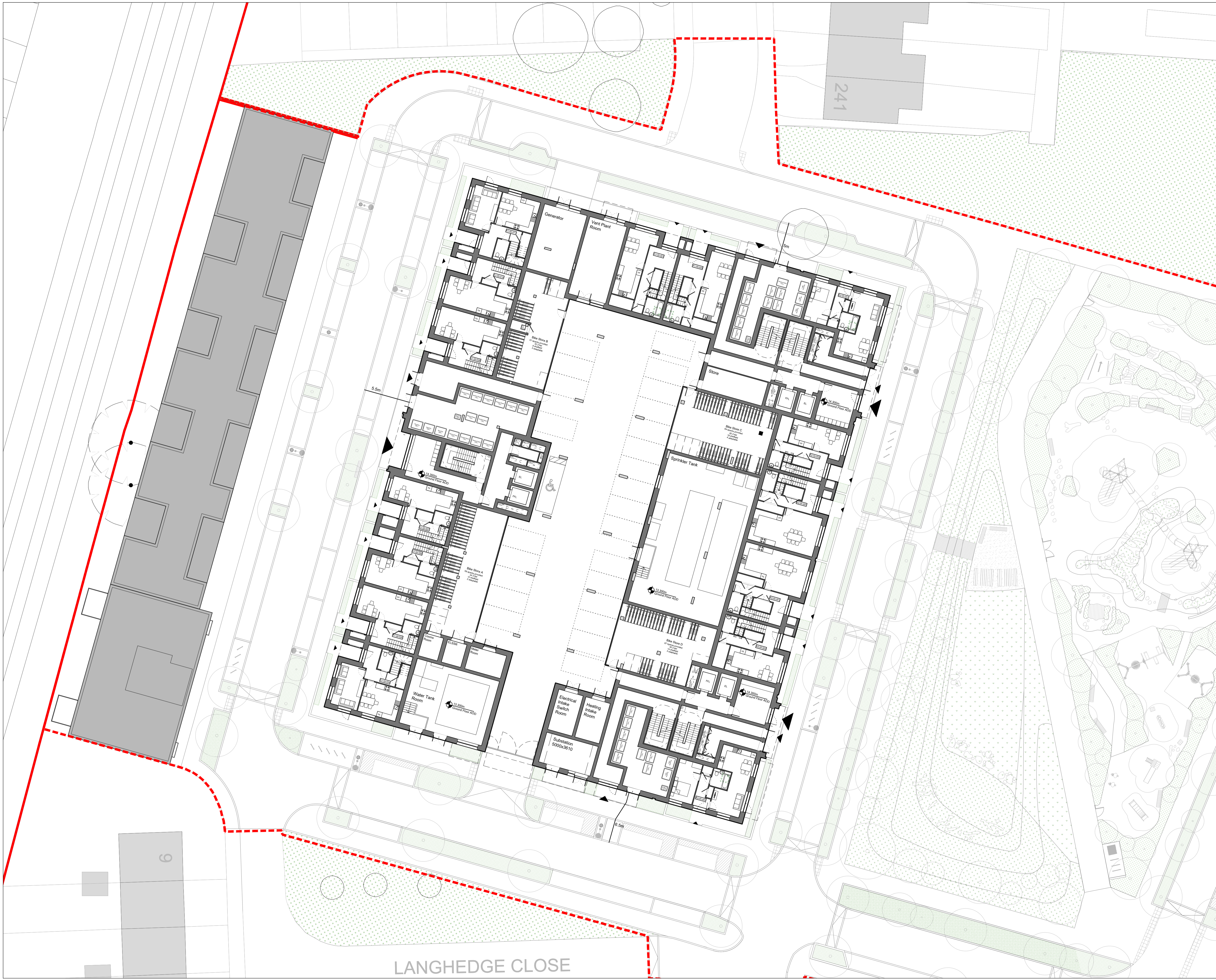
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1 : 200

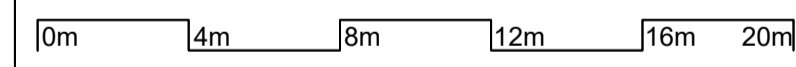
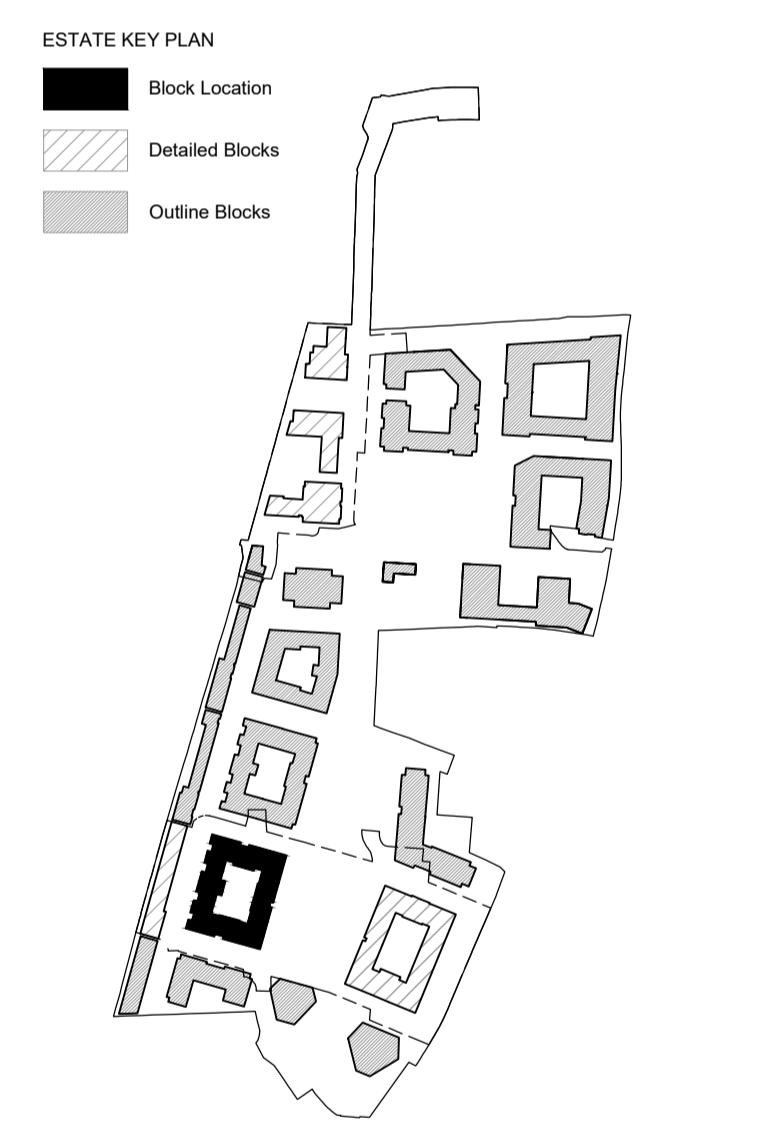
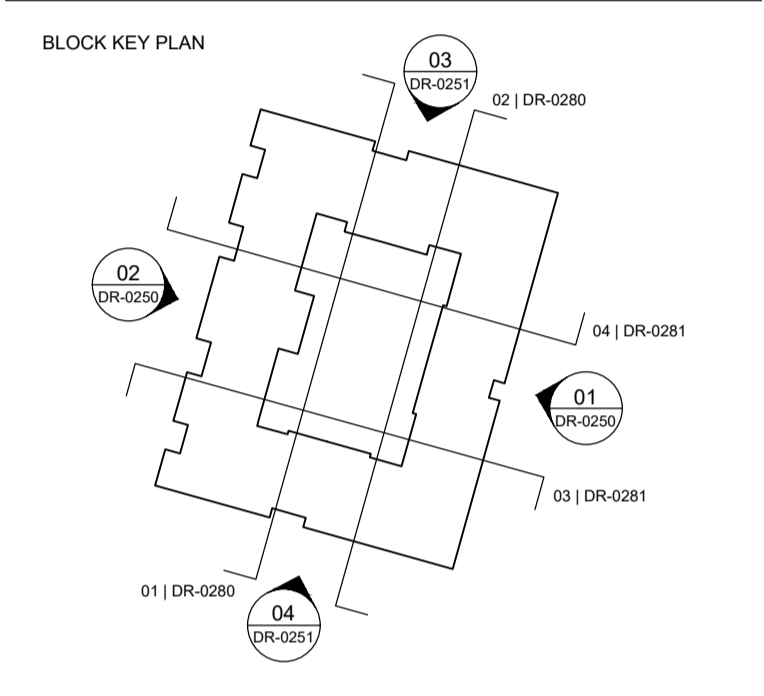


2 West Elevation
1 : 200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



PL1 05.04.24 TCO Planning Issue
 Rev Date Drawn Description
 STATUS
PLANNING ISSUE
 Client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 Drawing title
Block K
 East and West Elevations
 drawing number
 ENF-JSE-HTA-A-BK-DR-PL-0250
 scale @ A1
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3 North Elevation
1 : 200

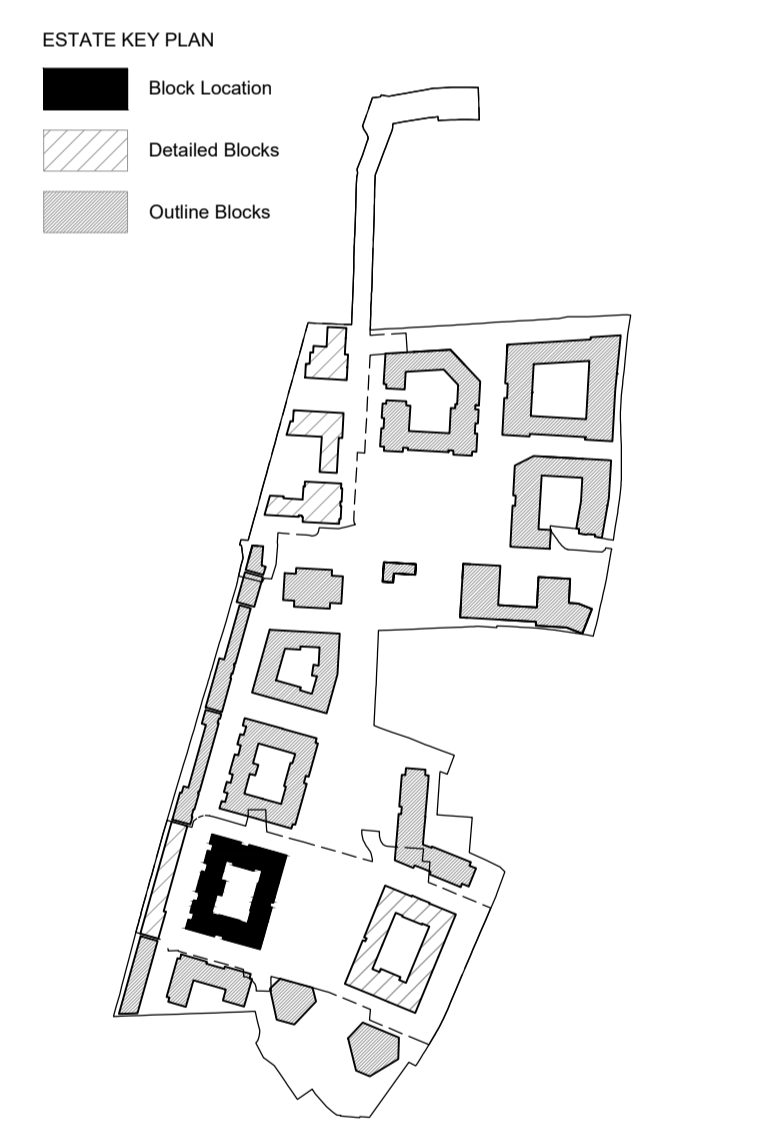
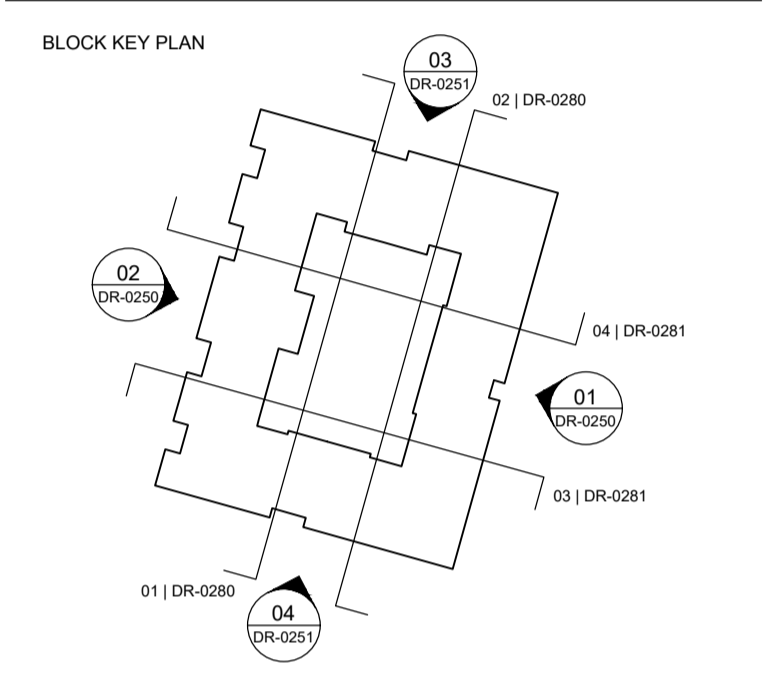


4 South Elevation
1 : 200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



PL1 05.04.24 TCO Planning Issue

Rev	Date	Drawn	Description
1			PLANNING ISSUE

client / project
LB Enfield
Joyce & Snell's Estate Regeneration

drawing title
Block K
North and South Elevations

drawing number
ENF-JSE-HTA-A-BK-DR-PL-0251

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revision
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project code
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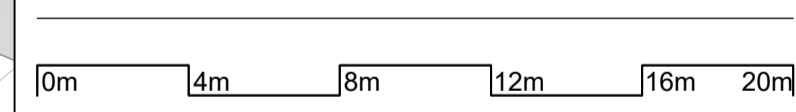
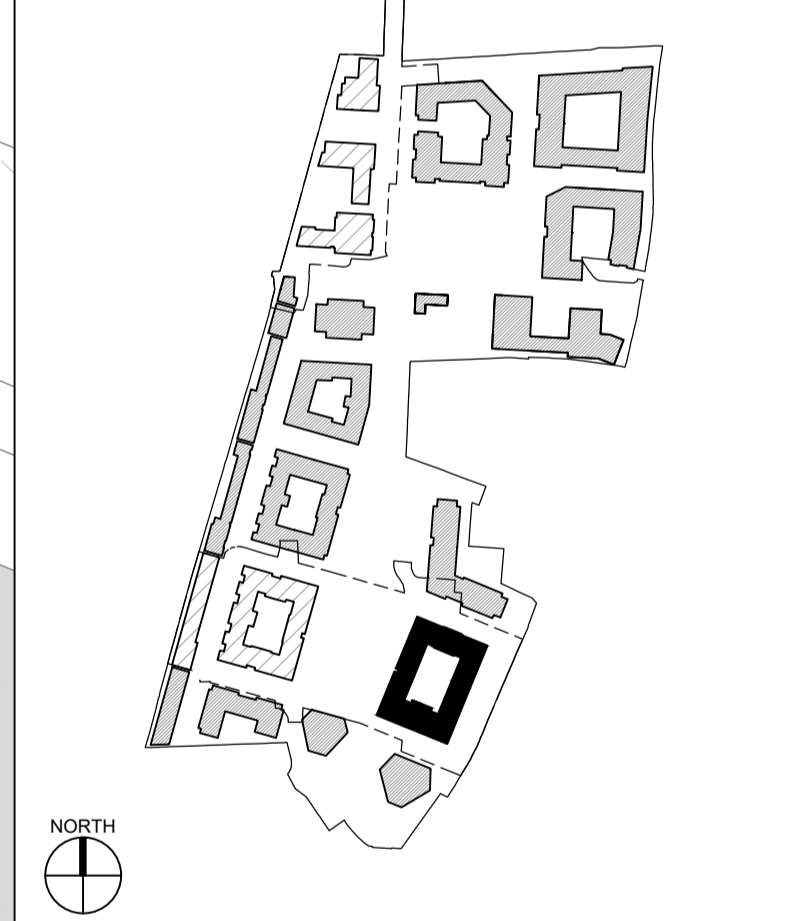
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 drawing title
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drawing number
ENF-JSE-HTA-A-BN-DR-PL-0100 revision **PL1**
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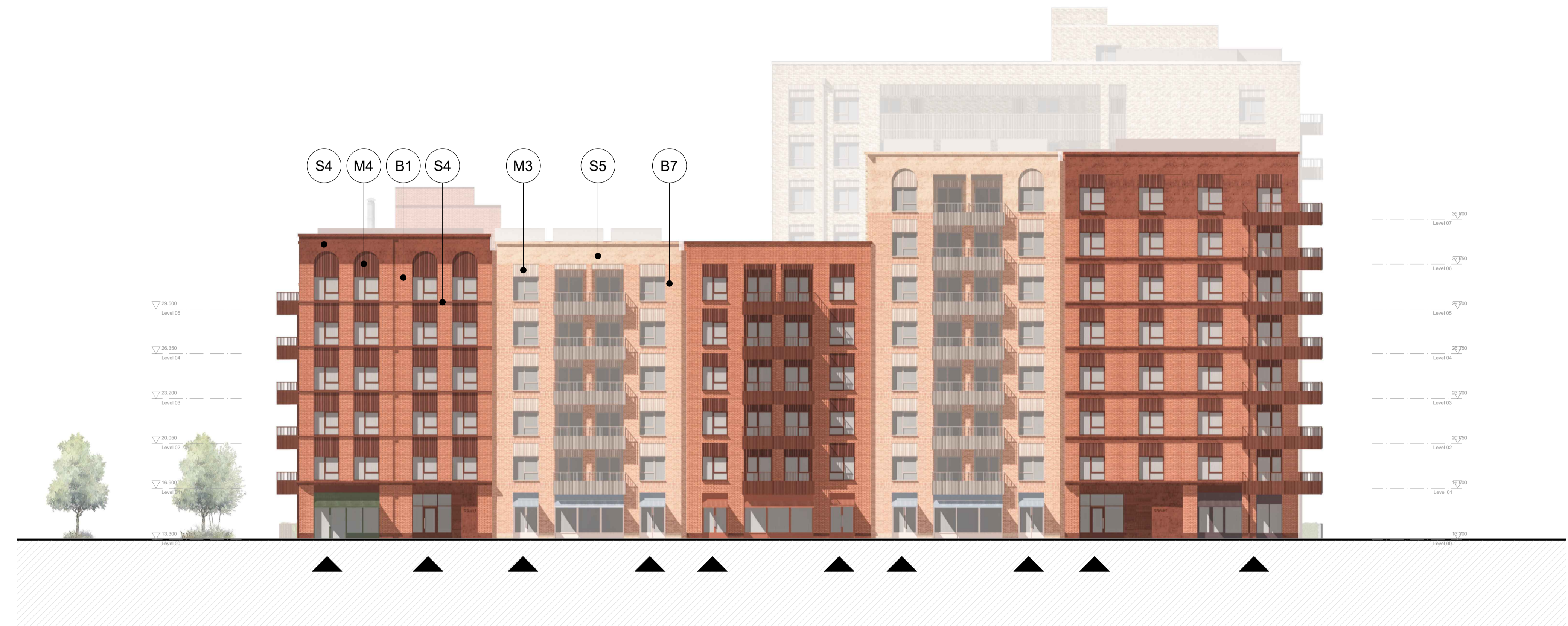
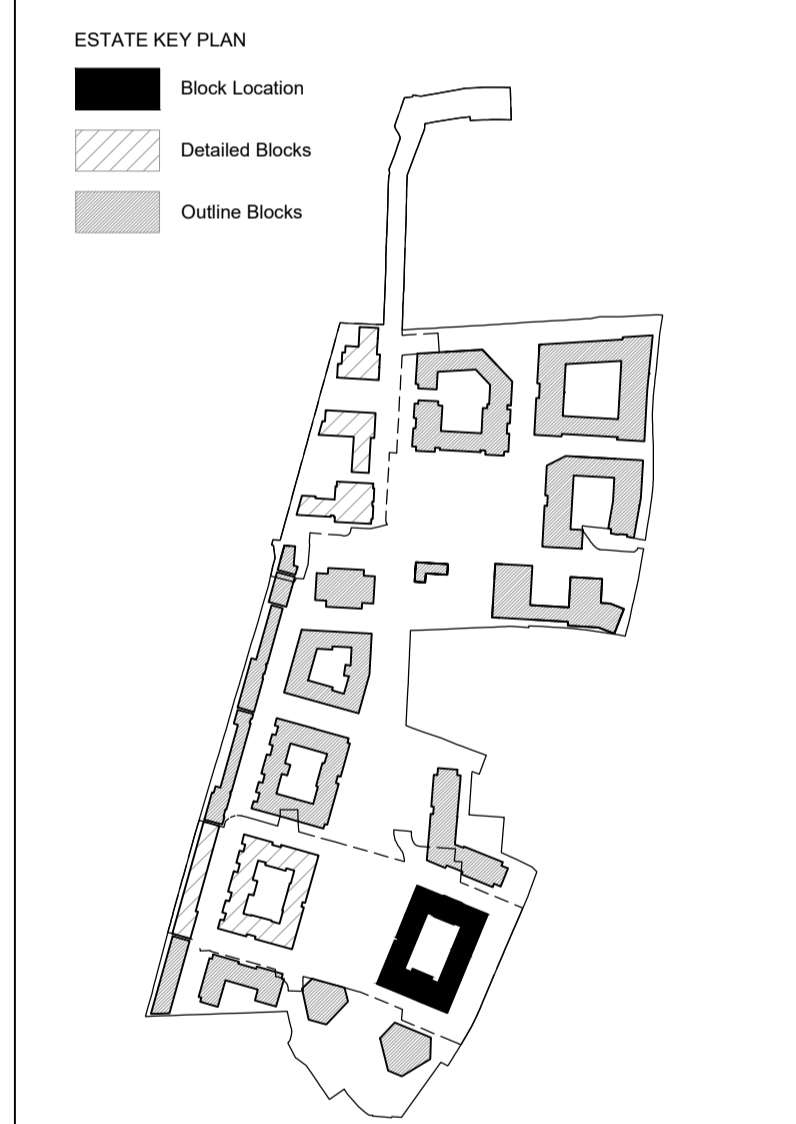
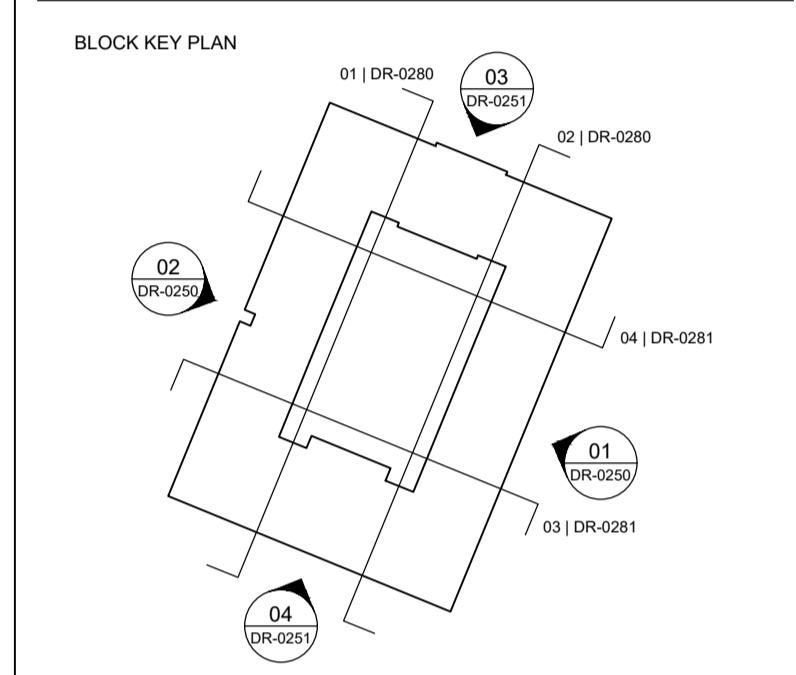
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LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		

Reconstituted Stone:	Entrances:	
S1	Dark Red/Brown	▶ Main Entrance
S2	Red/Brown	▶ Secondary Entrance
S3	Buff	▶ Home Entrance
S4	Red	
S5	Light Red	



1 East Elevation
1 : 200



2 West Elevation
1 : 200

PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block N
 East and West Elevations
 drawing number
 ENF-JSE-HTA-A-BN-DR-PL-0250
 scale @ A1
 1:200
 DRE
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revision
PL1
 project code
 ENF-JSE

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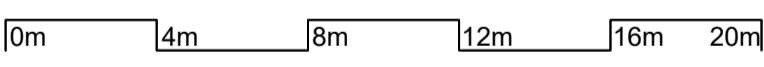
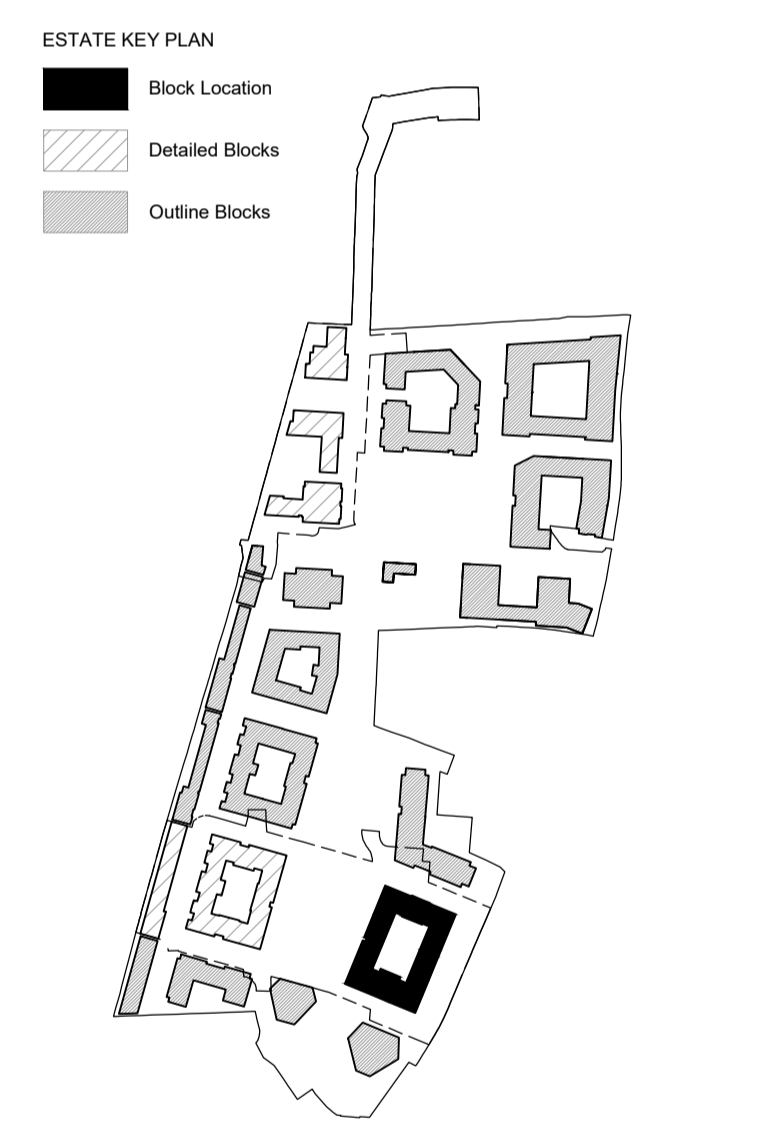
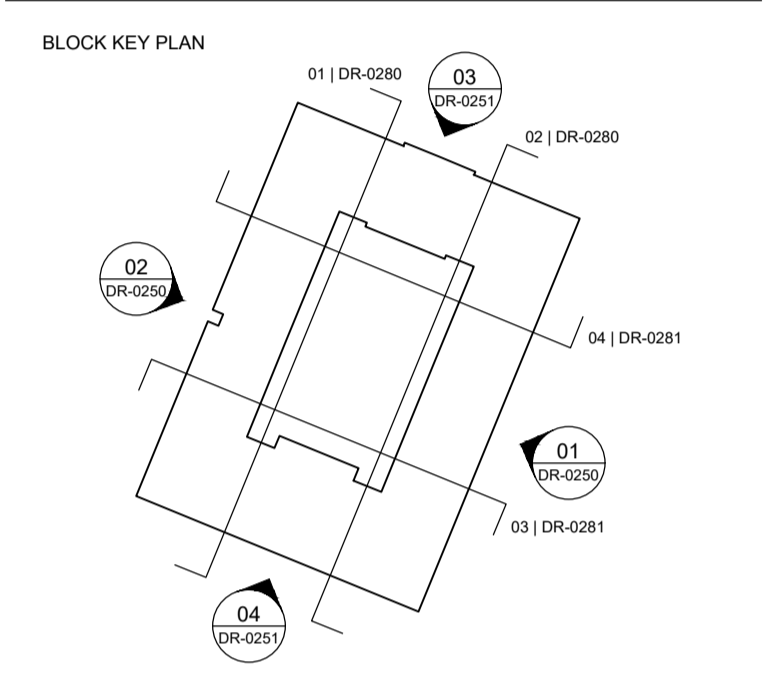
3 North Elevation
1 : 200



4 South Elevation
1 : 200

LEGEND

Brick:		Metal:	
B1	Red	M1	Red/Brown
B2	Brown	M2	Grey
B3	Dark Brown	M3	Light Grey
B4	Buff	M4	Red
B5	Red/Brown		
B6	Light Grey		
B7	Light Red		
Reconstituted Stone:		Entrances:	
S1	Dark Red/Brown	▶	Main Entrance
S2	Red/Brown	▶	Secondary Entrance
S3	Buff	▶	Home Entrance
S4	Red		
S5	Light Red		



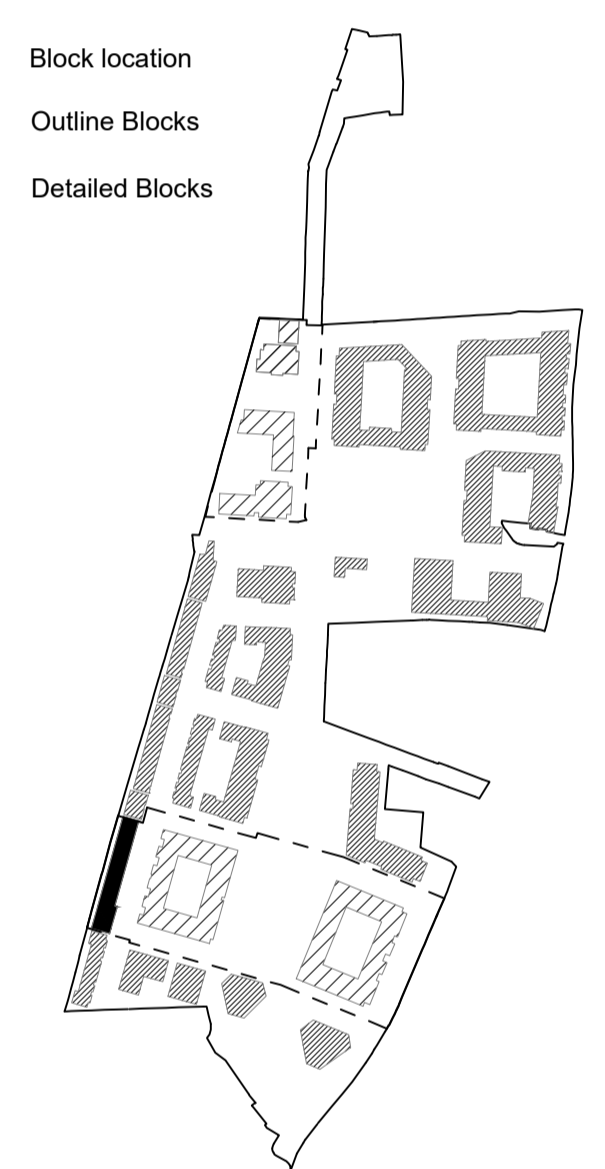
PL1 05.04.24 DRE Planning Issue
 Rev Date Drawn Description
 Status
PLANNING ISSUE
 client / project
 LB Enfield
 Joyce & Snell's Estate Regeneration
 drawing title
Block N
 North and South Elevations
 drawing number
 ENF-JSE-HTA-A-BN-DR-PL-0251
 scale @ A1
 1:200
 HTA Design LLP
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revision
PL1
 project code
 ENF-JSE

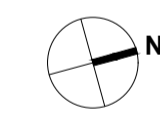
- LEGEND**
- Hybrid application site boundary
 - - - Detailed application site boundary
- DRI Dry riser inlet
 - DRO Dry riser outlet
 - WR Wet riser
 - EISR Electrical intake/switch room
 - ELSSR Electrical life safety switch room
 - HBIR Heating block intake room

- Tenure:
- SRD Social rent decant
 - SED Shared equity decant
 - SRU Social rent uplift
 - SO Shared ownership
 - MS Market sale

- █ Block location
- ▒ Outline Blocks
- ▨ Detailed Blocks



True North



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FOR PLANNING

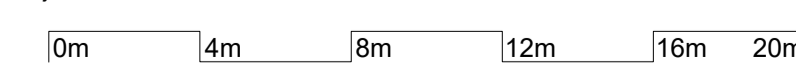
revision	date	drawn	description
-	22.09.22	JT	Planning issue

Block T-GA-Levels 00 and 01
 General Arrangement Plans

ENF-JSE-SGI-A-DR-T-PL-0200
 number - revision

LB Enfield
 Joyce and Snell's Estate Regeneration

ENF-JSE
 job reference JT
 scale drawn

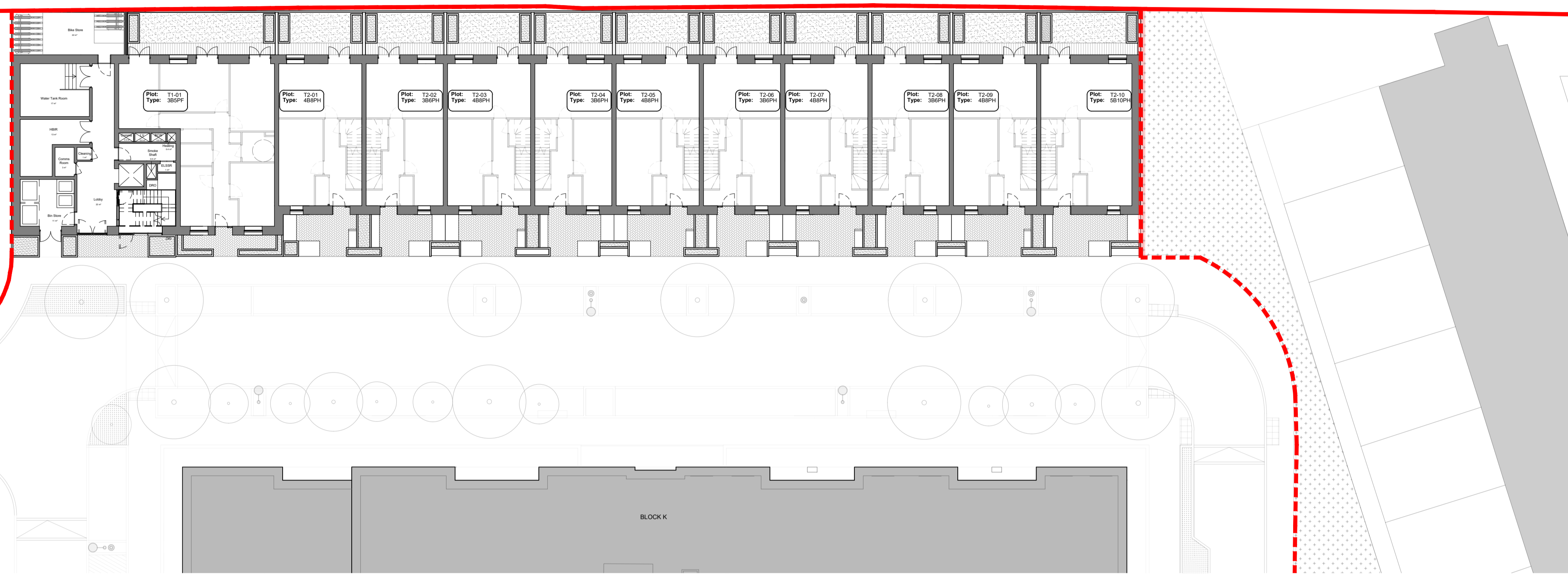


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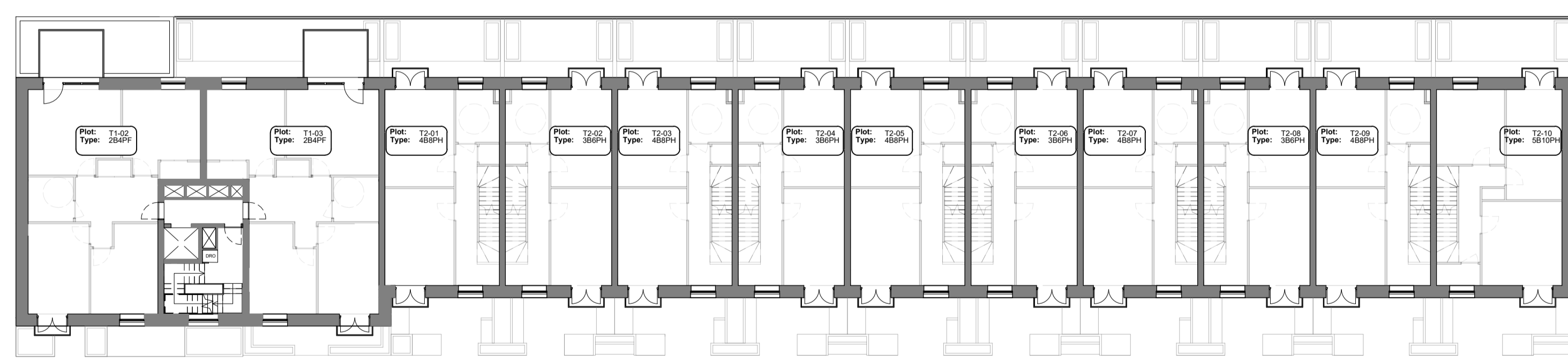
RAILWAY LINE

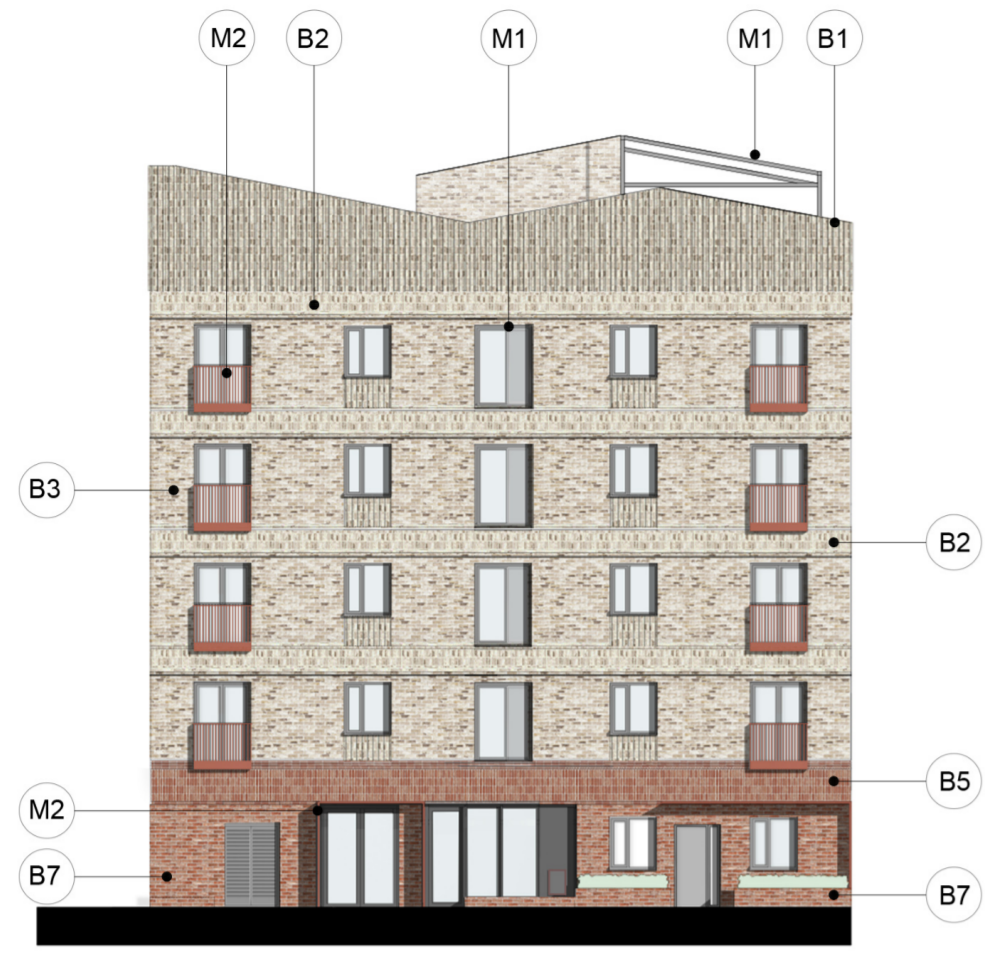
BLOCK K

1 Block T Level 00
 1 : 200



2 Block T Level 01
 1 : 200





1 Block T East Elevation Apartment Block
1 : 200



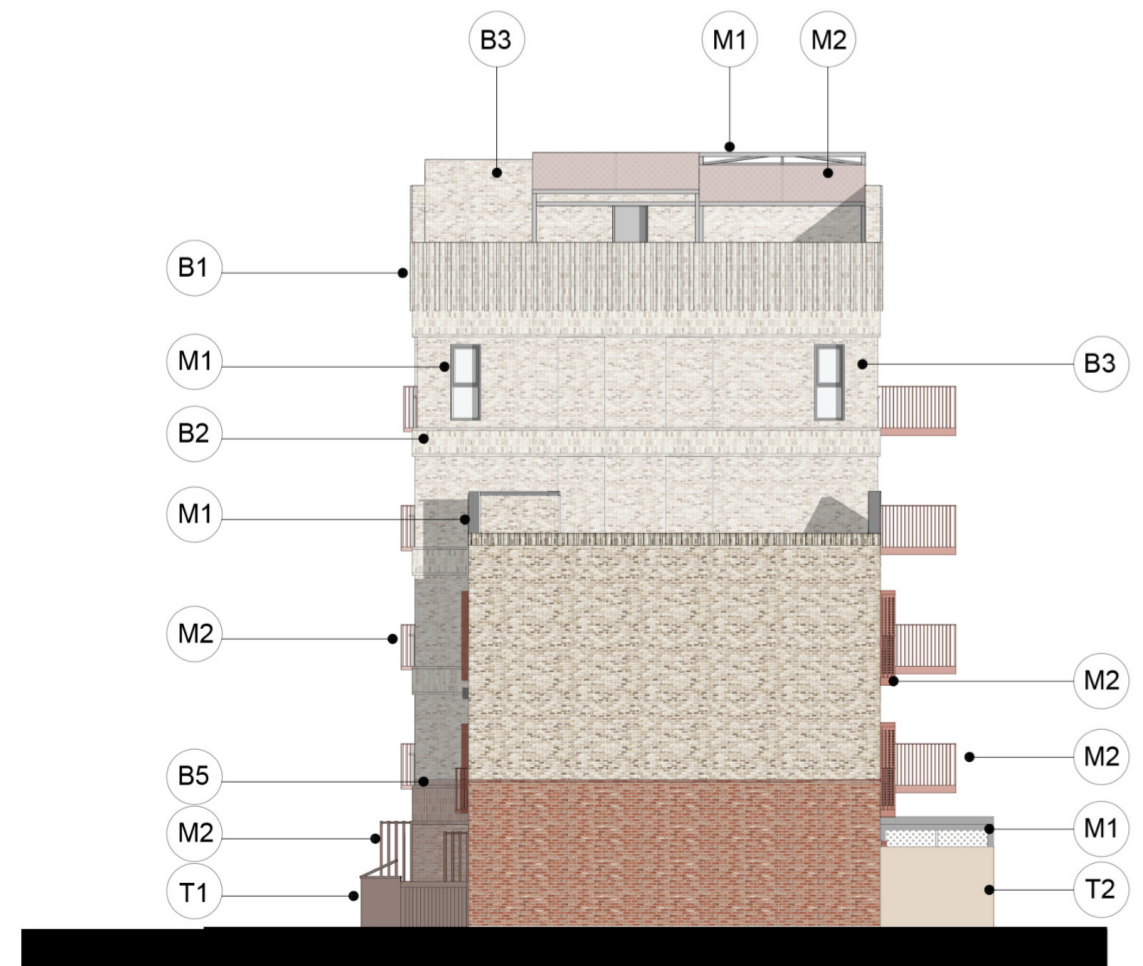
2 Block T East Elevation Houses
1 : 200



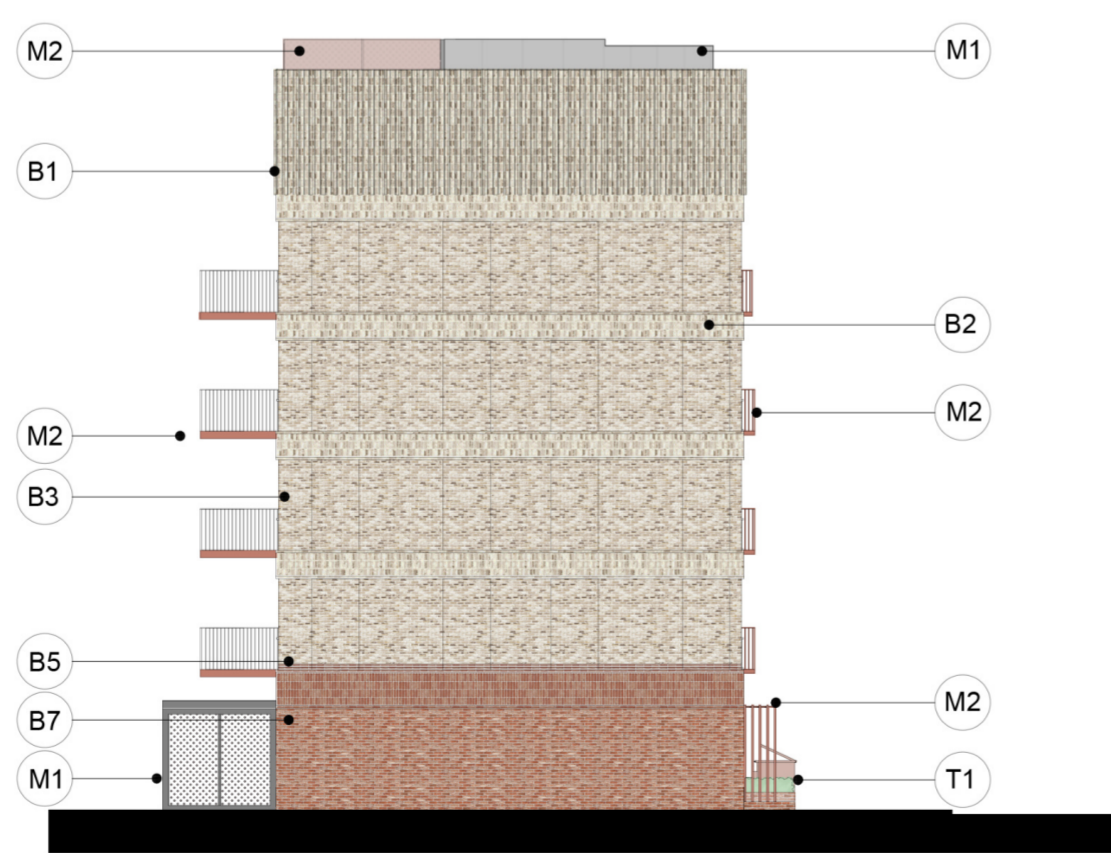
3 Block T West Elevation Apartment Block
1 : 200



4 Block T West Elevation Houses
1 : 200



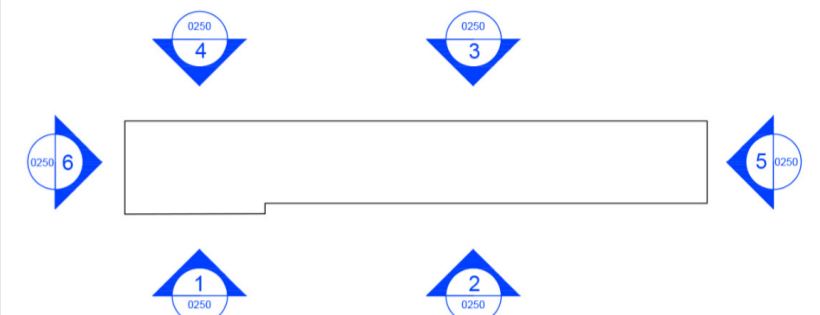
5 Block T North Elevation
1 : 200



6 Block T South Elevation
1 : 200

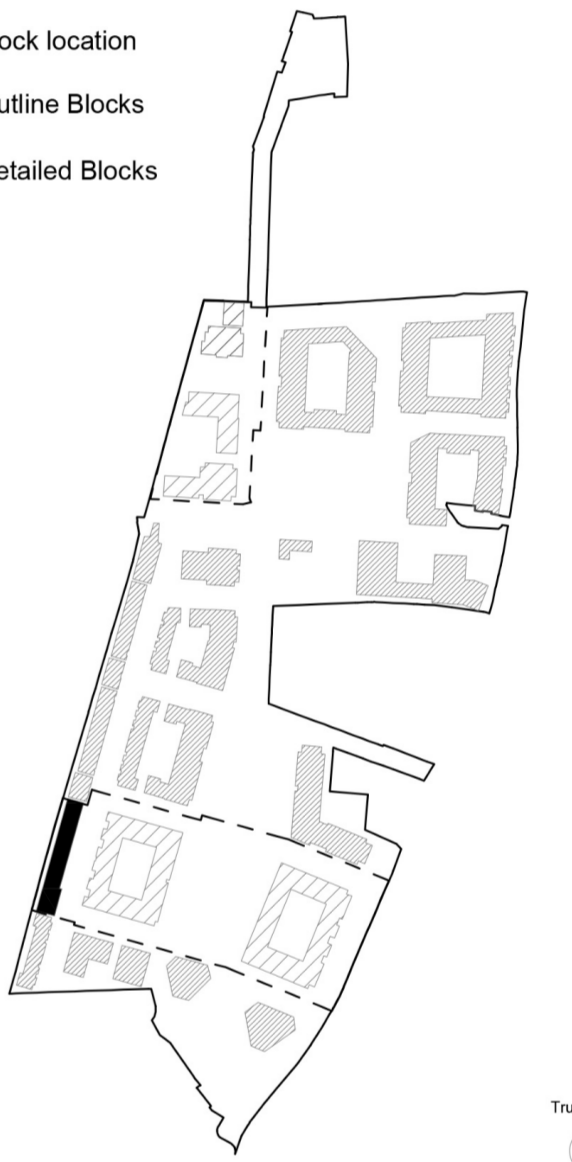
Materiality Legend:

- Brick**
- B1 - White/Buf Multi - Stacked Soldier Course - Projected Band
- B2 - White/Buf Multi - Stacked Soldier Course - Projected Band
- B3 - White/Buf Multi - Stretcher Course
- B4 - Red Multi - Stacked Soldier Course - Corduroy Detail
- B5 - Red Multi - Stacked Soldier Course - Projected Band
- B6 - Red Multi - Stretcher Course - Projected Single Course
- B7 - Red Multi - Stretcher Course
- Metal**
- M1 - Grey RAL 7043
- M2 - Red-Brown RAL 410-M
- GRC**
- G1 - Red-Brown
- Timber**
- T1 - Red-Brown
- T2 - Stiated



Elevations Plan Block T

- Block location
- Outline Blocks
- Detailed Blocks



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FOR PLANNING

revision	date	drawn	description
1	22.09.22	JHS	Planning issue
2	09.12.22	JHS	Planning issue

Block T-GA-Elevations
Proposed East, West, North and South Elevations

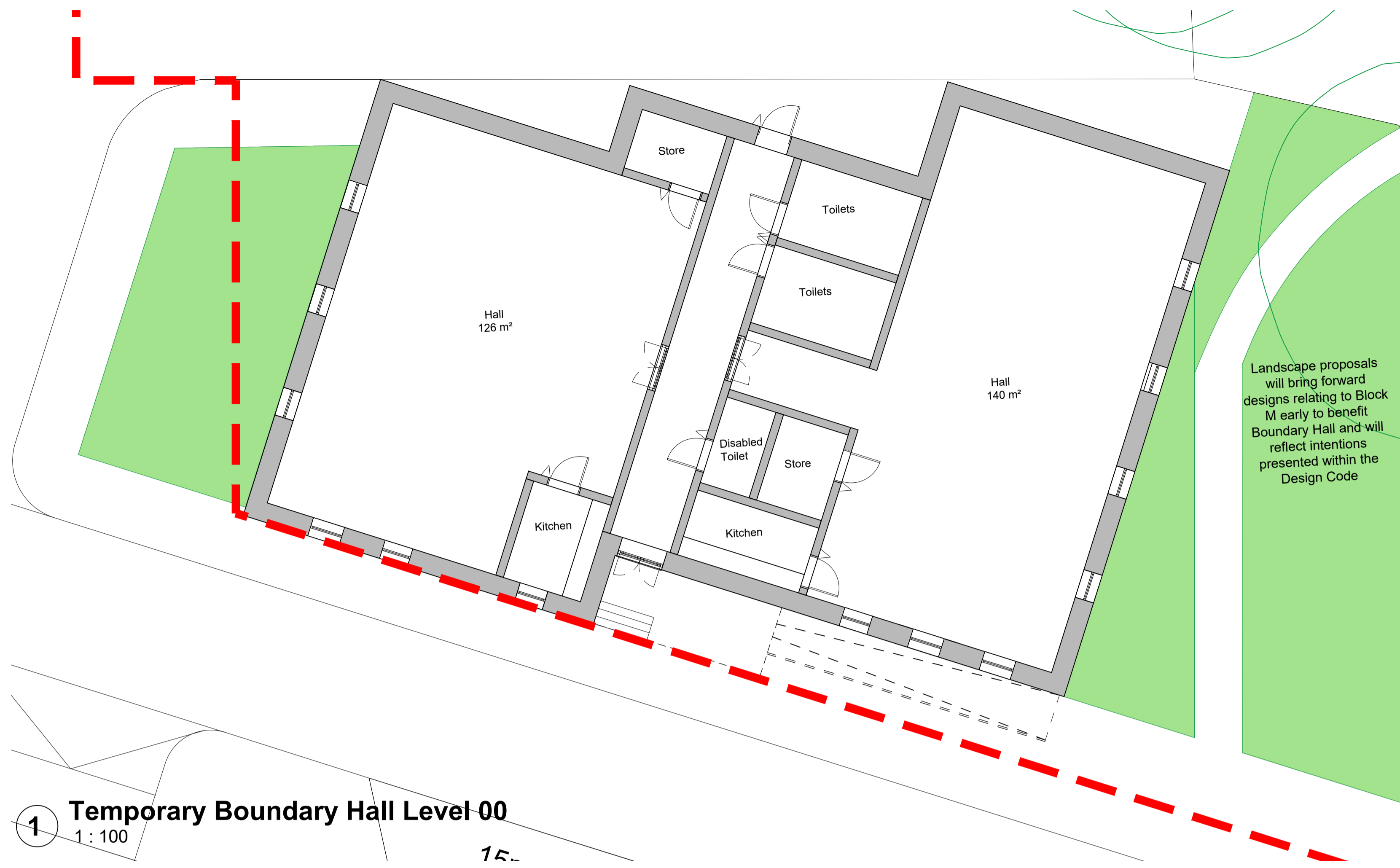
ENF-JSE-SGI-A-DR-T-PL-0250 2
number revision

LB Enfield
Joyce and Snell's Estate Regeneration

ENF-JSE 1:200 @ A1 JHS
job reference scale drawn

0m 4m 8m 12m 16m 20m

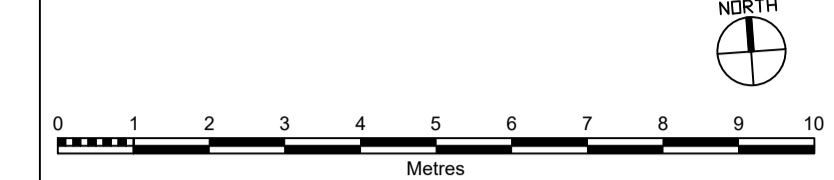
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- Legend
- Hybrid application site boundary
 - - - Extent of development for detailed application
 - Land within applicant ownership within masterplan area



Rev	Date	Drawn	Description
E	05.04.24	RRO	Planning issue
D	01.03.24	RRO	Draft planning issue
C	30.06.23	RRO	Amended drawing title
B	19.05.23	RRO	Draft planning issue
A	15.12.22	RRO	Updated design
-	30.09.22	RRO	Planning issue

STATUS
PLANNING

client / project
LB Enfield

Joyce & Snell's Estate Regeneration

drawing title
**Temporary Boundary Hall
Proposed Plans**

drawing number
ENF-JSE-HTA-A-DR-BH-PL-0200

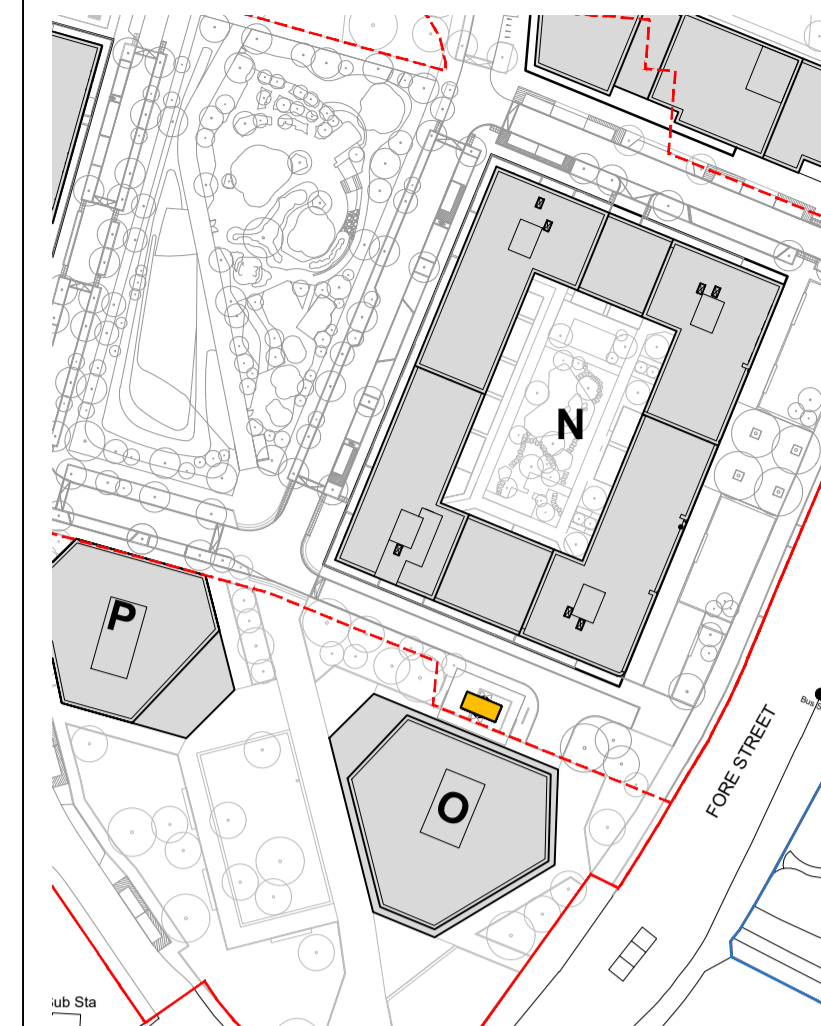
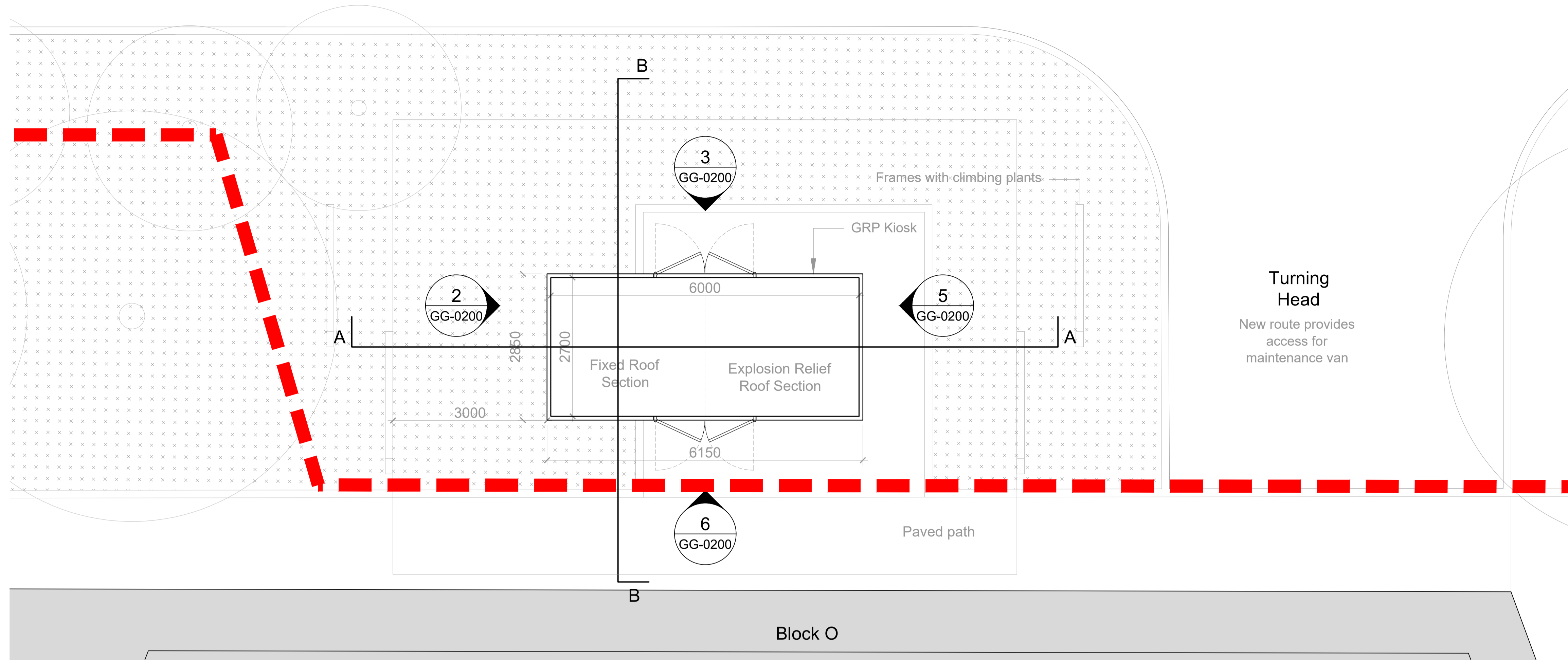
scale @ A1
1:100

originated by
RRO

revision
E

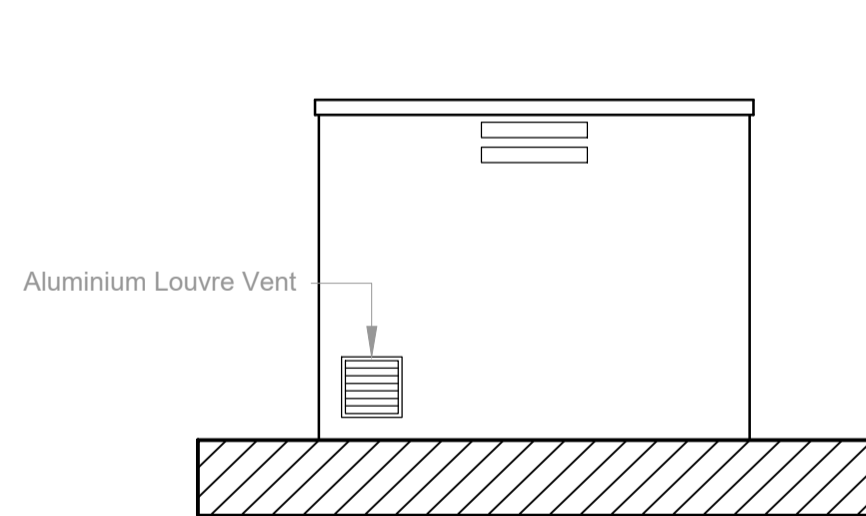
project code
ENF-JSE

Service Road - Shared Surface

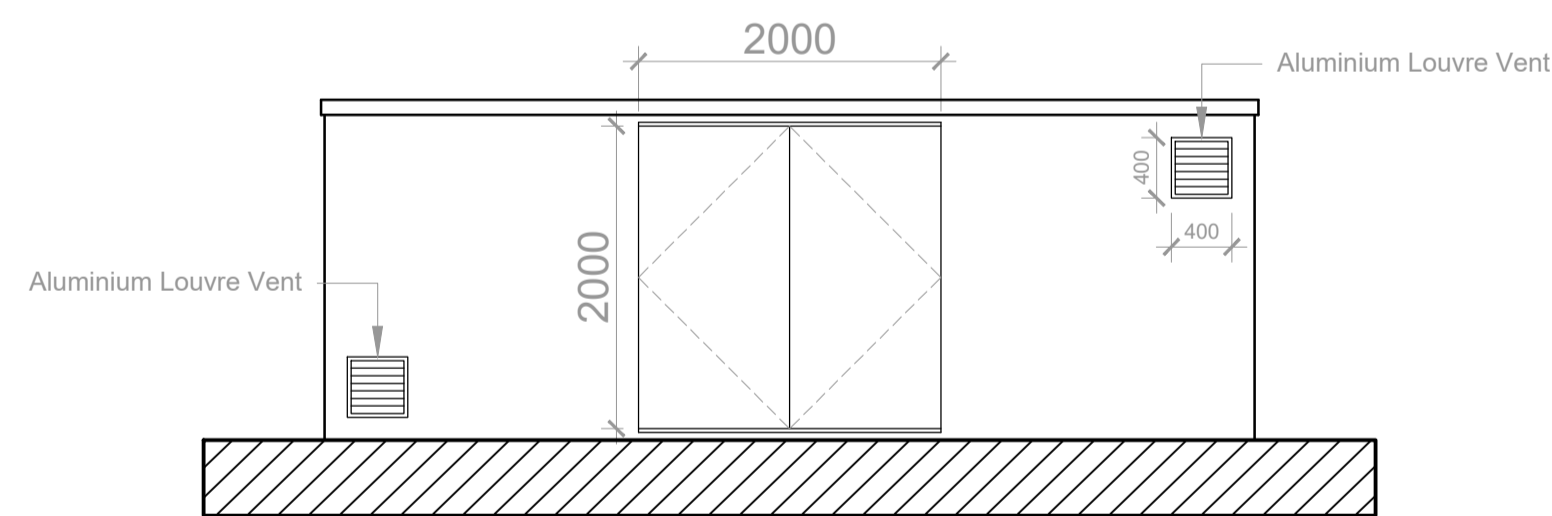


8 Site Location Plan
1 : 1250

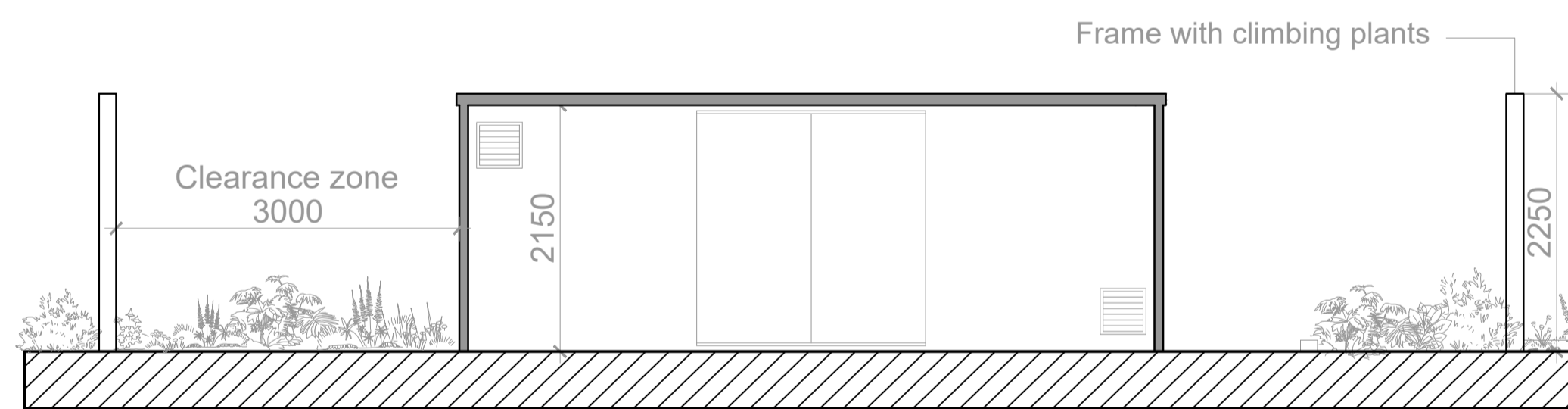
1 Floor Plan
1 : 50



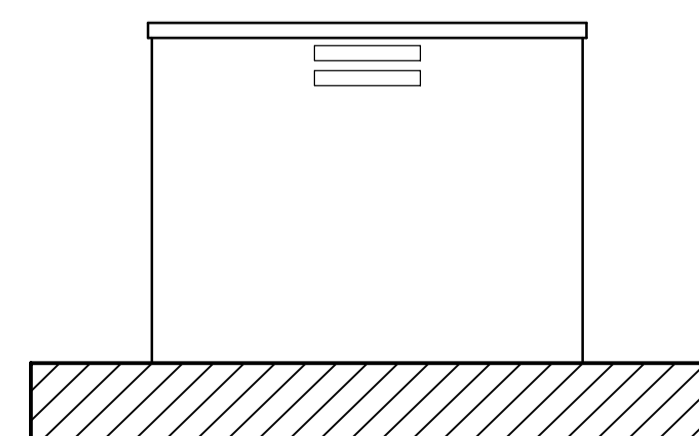
2 North-West Elevation
1 : 50



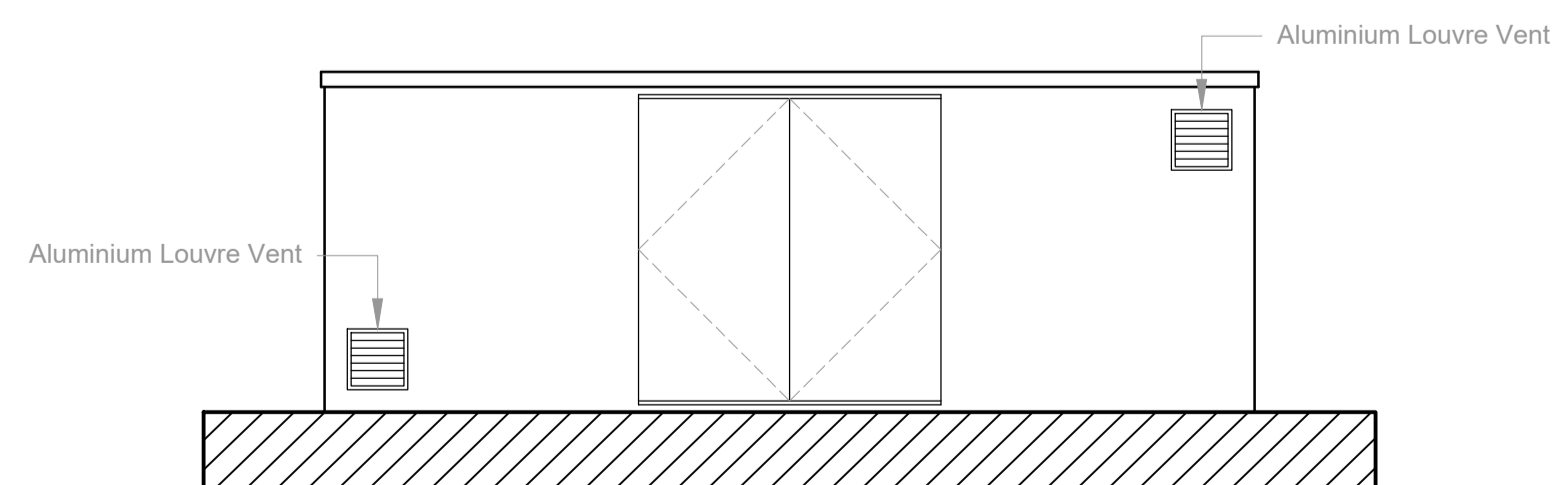
3 North-East (Front) Elevation
1 : 50



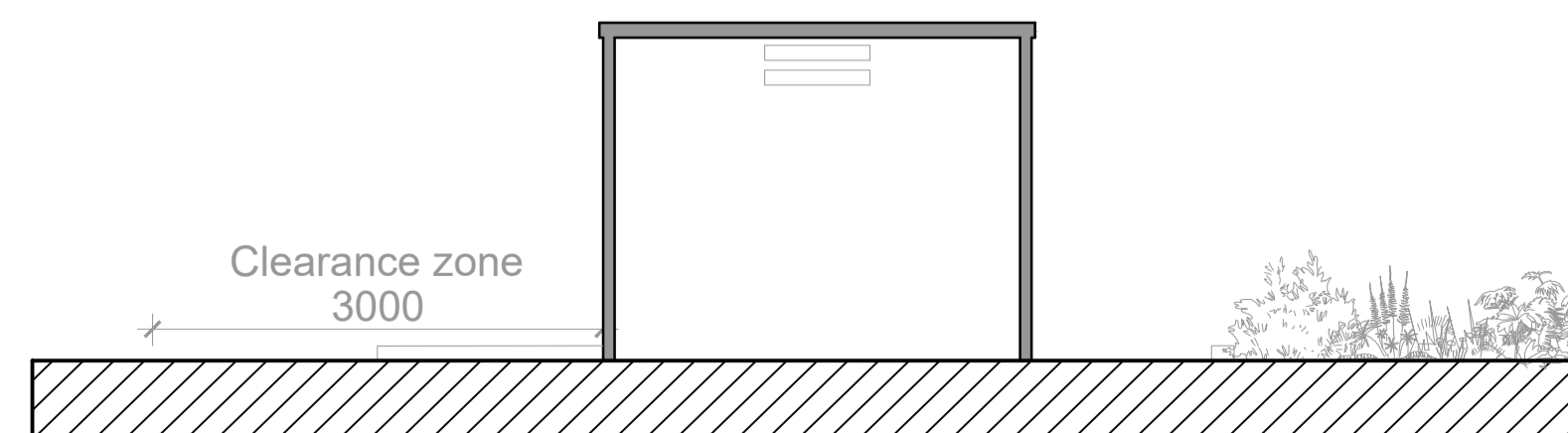
4 Section AA
1 : 50



5 South-East Elevation
1 : 50



6 South-West (Rear) Elevation
1 : 50



7 Section BB
1 : 50



LEGEND:
 Hybrid application site boundary
 Extent of development for detailed application
 Land within applicant ownership

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FOR PLANNING

revision	date	drawn	description
-	19.05.23	RRO	Draft planning issue

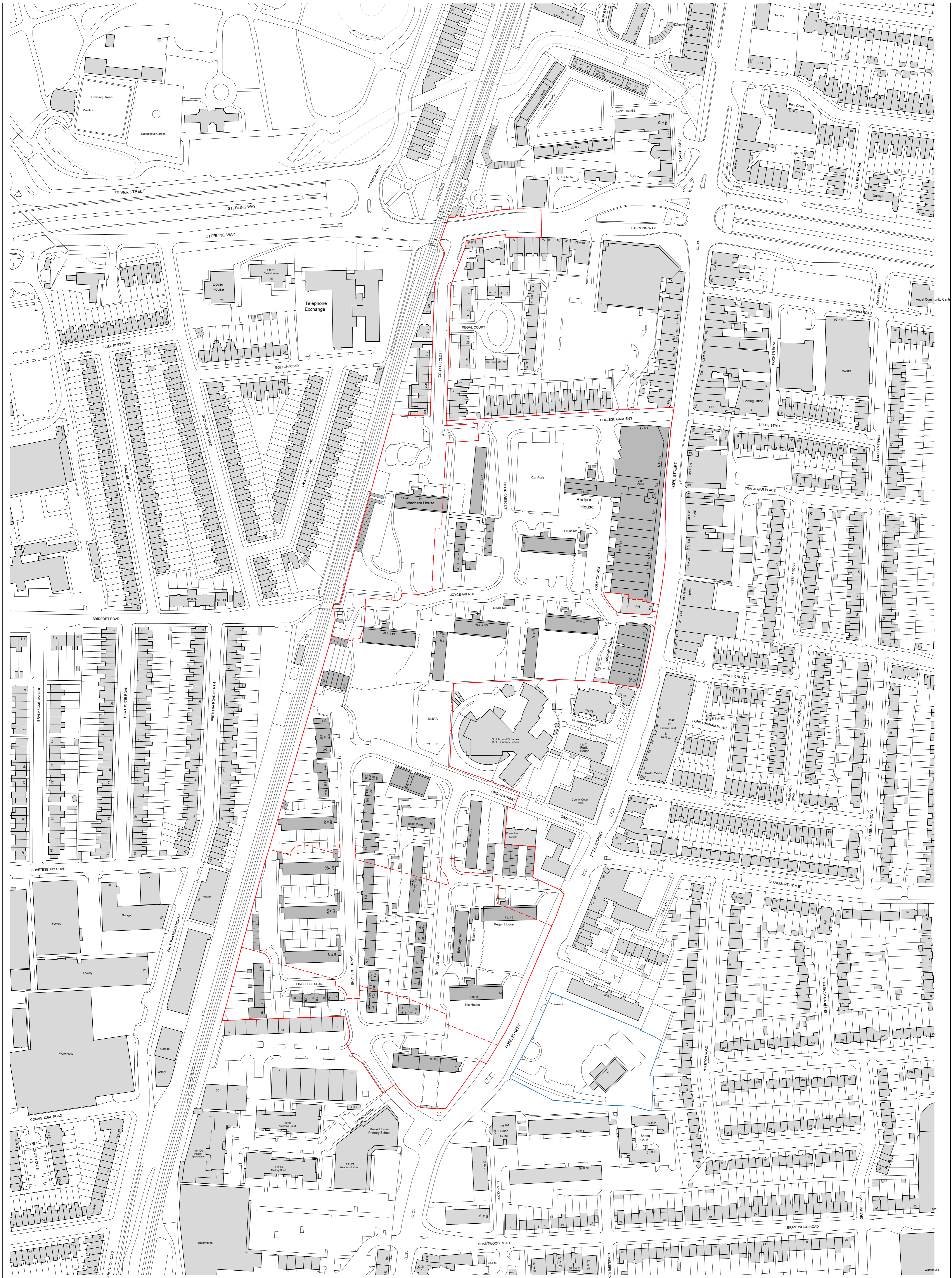
Gas Governor
 Proposed Plans, Elevations and Sections
 Hybrid Masterplan
 ENF-JSE-HTA-A-DR-GG-PL-0201
 number - revision

LB Enfield
 Joyce & Snells Estate Regeneration

ENF-JSE job reference 1:50 @ A1 scale TCO drawn

0m 1m 2m 3m 4m 5m
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Rev	Date	Drawn	Description
A	01.09.22	RRC	Initial Issue
B	29.09.22	AJK	Red line site boundary altered. Blue boundary added.
B	30.06.23	RRC	Legend updated

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Legend	Description
	Hybrid application site boundary
	Extent of development for detailed application
	Land within applicant ownership within masterplan area

Site Location Plan
 drawing title
Joy & Snell's Estate Regeneration
 client / project

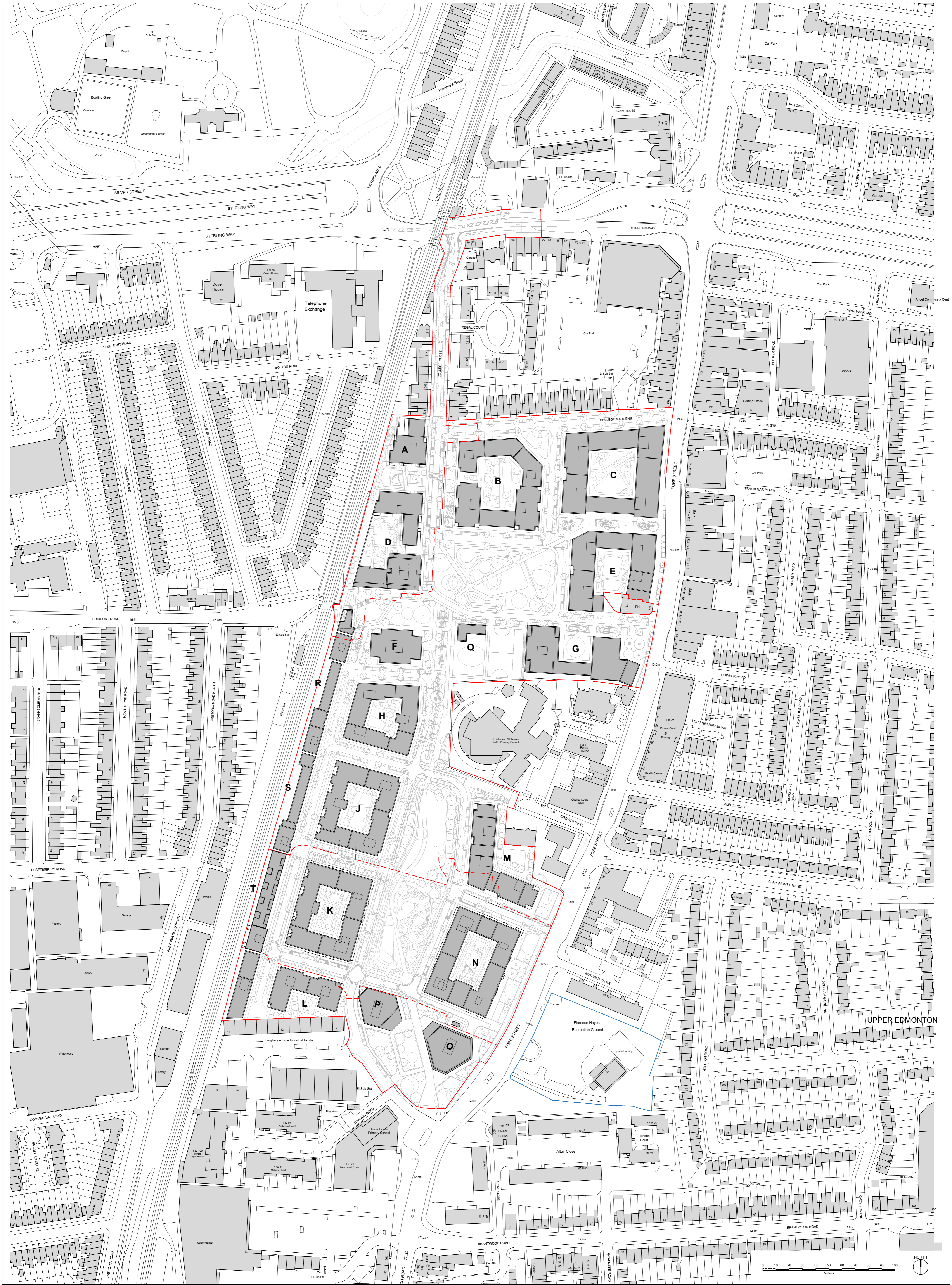
ENF-JSE-HTA-A-DR-XX-PL-0001
 drawing number
 1:1250
 scale @ A1

B
 revision
 ENF-JSE
 project number
 RRO
 originated by

FOR PLANNING
 status

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Rev	Date	Drawn	Description
-	28.09.22	RRO	Initial Issue
A	29.09.22	AJK	Red line site boundary altered. Blue boundary added.
B	15.12.22	RRO	Gas governor added
C	06.04.23	RRO	EIA Issue
D	19.05.23	RRO	Draft planning issue
E	06.06.23	RRO	Updated block K and on street parking
F	30.05.23	RRO	Planning issue
G	18.01.24	RRO	Design Freeze Issue
H	05.03.24	RRO	Draft planning issue
I	27.03.24	RRO	Planning issue
J	05.04.24	RRO	Planning issue

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- Legend
- - - Hybrid application site boundary
 - - - Extent of development for detailed application
 - Land within applicant ownership within masterplan area

Illustrative Masterplan
 drawing title
LB Enfield
 Joyce & Snell's Estate Regeneration
 client's project

ENF-JSE-HTA-A-DR-XX-PL-0100
 drawing number

1:1250
 scale @ A1

ENF-JSE
 project number

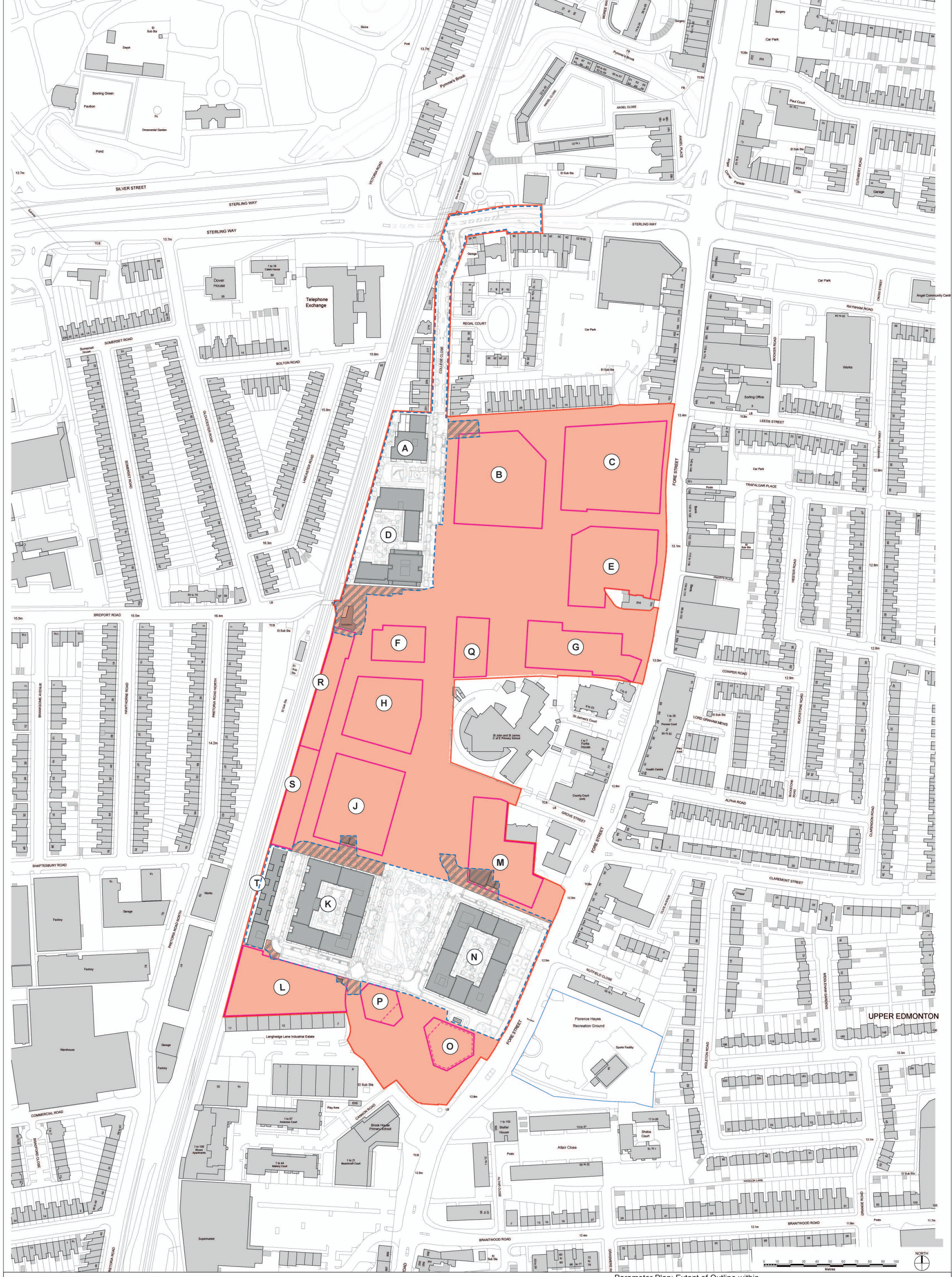
J
 revision

RRO
 originated by

DESIGN FREEZE
 status

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Rev Date Drawn Description
 D 19.05.23 AJK Draft Planning Issue
 E 08.06.23 RRO Gas governor added and block K updated
 F 07.07.23 RRO Planning Issue
 G 18.01.24 RRO Design Freeze Issue
 H 01.03.24 RRO Draft Planning Issue
 I 05.04.24 RRO Planning Issue

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Key	Description
	Hybrid Application - Outline Site Boundary
	Hybrid Application - Detailed Site Boundary
	Plot letters
	Extent of temporary works within detailed application site boundary
	Land within applicant ownership
	Detailed Block footprints
	Extent of Outline element of hybrid application
	Extent of Plot Boundary

Parameter Plan: Extent of Outline within Hybrid Application
 drawing title

ENF-JSE-HTA-A-DR-XX-PL-PP01
 drawing number

LB Enfield
 client / project

Joyce and Snell's Regeneration
 project number

ENF-JSE
 project number

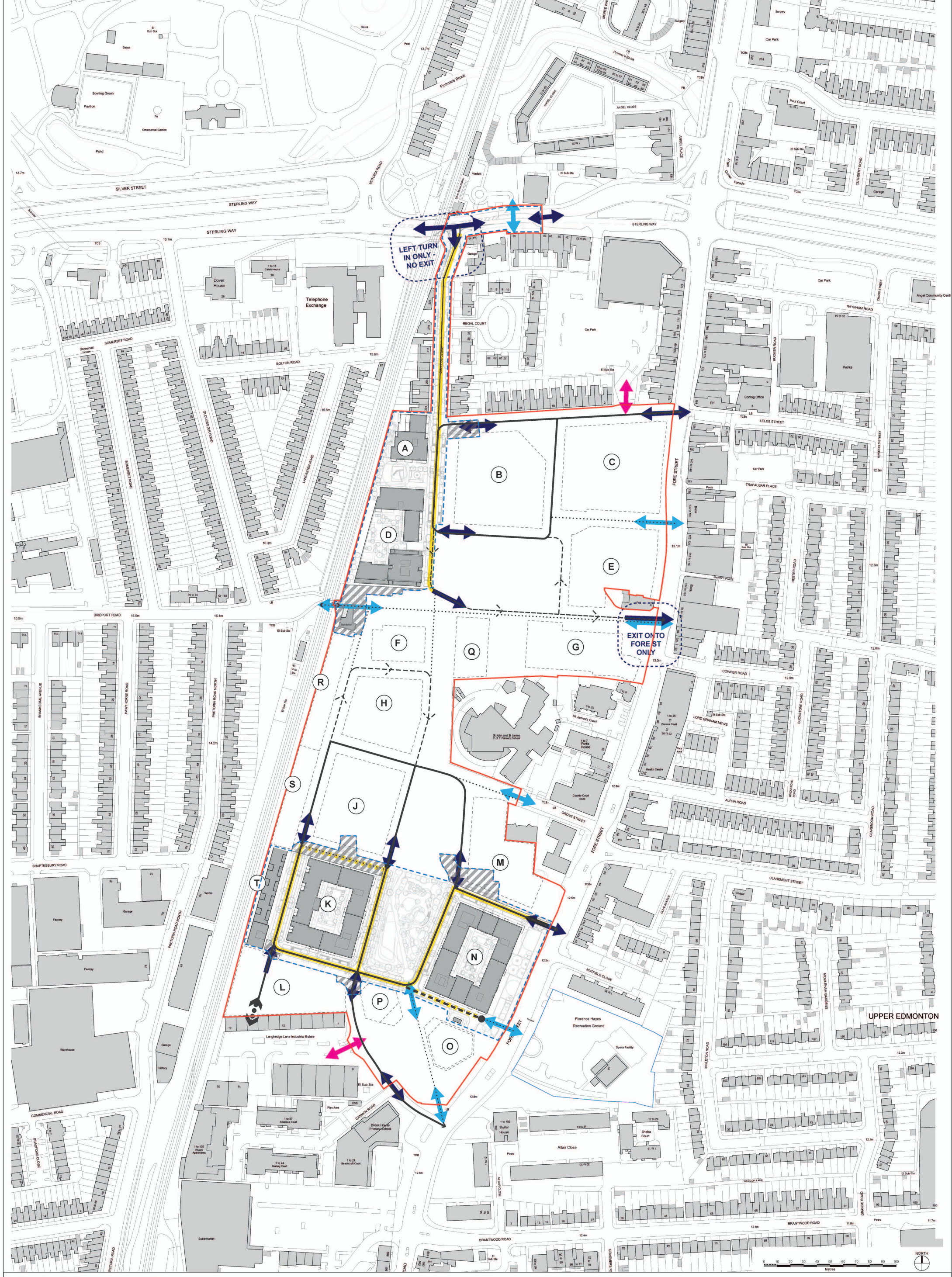
AJK
 originated by

1:2500
 scale @ A3

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 status





Rev Date Drawn Description
 D 19.05.23 AJK Draft Planning Issue
 E 08.06.23 RRO Gas governor added and block K updated
 F 07.07.23 RRO Planning Issue
 G 18.01.24 RRO Design Freeze Issue
 H 01.03.24 RRO Draft Planning Issue
 I 05.04.24 RRO Planning Issue

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<p>Key</p> <ul style="list-style-type: none"> Hybrid Planning Application Site Boundary Extent of Detailed element of hybrid application Plot letters Extent of Plot Boundary Land within applicant ownership 	<ul style="list-style-type: none"> → Vehicular Site Access → Car Park Vehicular Site Access (Private) → Pedestrian / Cycle Site Access → Roads delivered within Detailed Element → Pedestrian routes delivered within Detailed Element → Proposed Key Pedestrian Routes Extent of temporary works within detailed application site boundary 	<ul style="list-style-type: none"> Proposed Vehicular Road Network Proposed One-way Shared Surface Routes Shared Surface - Service Road access only ↔ Potential for future access <p>NOTE - Circulation shown indicatively to help understand site access. Please see PP03 for further circulation details.</p>
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Parameter Plan: Site Access
 drawing title

ENF-JSE-HTA-A-DR-XX-PL-PP02
 drawing number

LB Enfield
 client / project
 Joyce and Snell's Regeneration

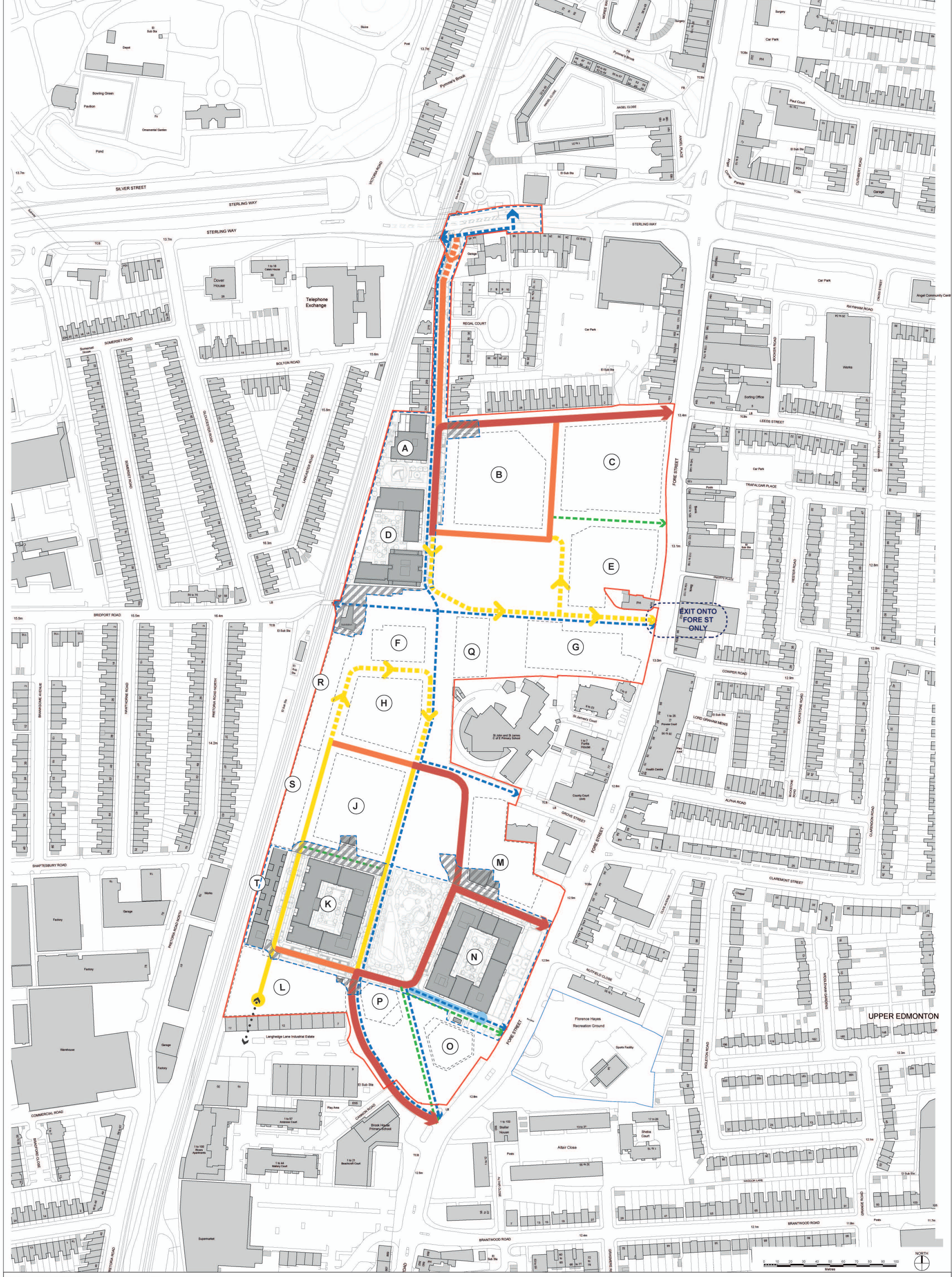
1:2500
 scale @ A3

ENF-JSE
 project number

AJK
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 status



Rev	Date	Drawn	Description
D	19.05.23	AJK	Draft Planning Issue
E	08.06.23	RRO	Gas governor added and block K updated
F	07.07.23	RRO	Planning Issue
G	18.01.24	RRO	Design Freeze Issue
H	01.03.24	RRO	Draft Planning Issue
I	05.04.24	RRO	Planning Issue

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Key	
	Hybrid Application - Outline Site Boundary
	Hybrid Application - Detailed Site Boundary
	Plot letters
	Extent of Plot Boundary
	Land within applicant ownership
	Primary Road
	Secondary Road
	Secondary Road - One Way Access
	Tertiary Road
	Tertiary Road - One Way Access
	Service Access Road
	Pedestrian / Cycle Route
	Pedestrian Only
	Potential for future access
	Extent of temporary works within detailed application site boundary

Parameter Plan: Circulation
drawing title

LB Enfield
client / project
Joyce and Snell's Regeneration

FOR PLANNING
status

ENF-JSE-HTA-A-DR-XX-PL-PP03
drawing number

1:2500
scale @ A3

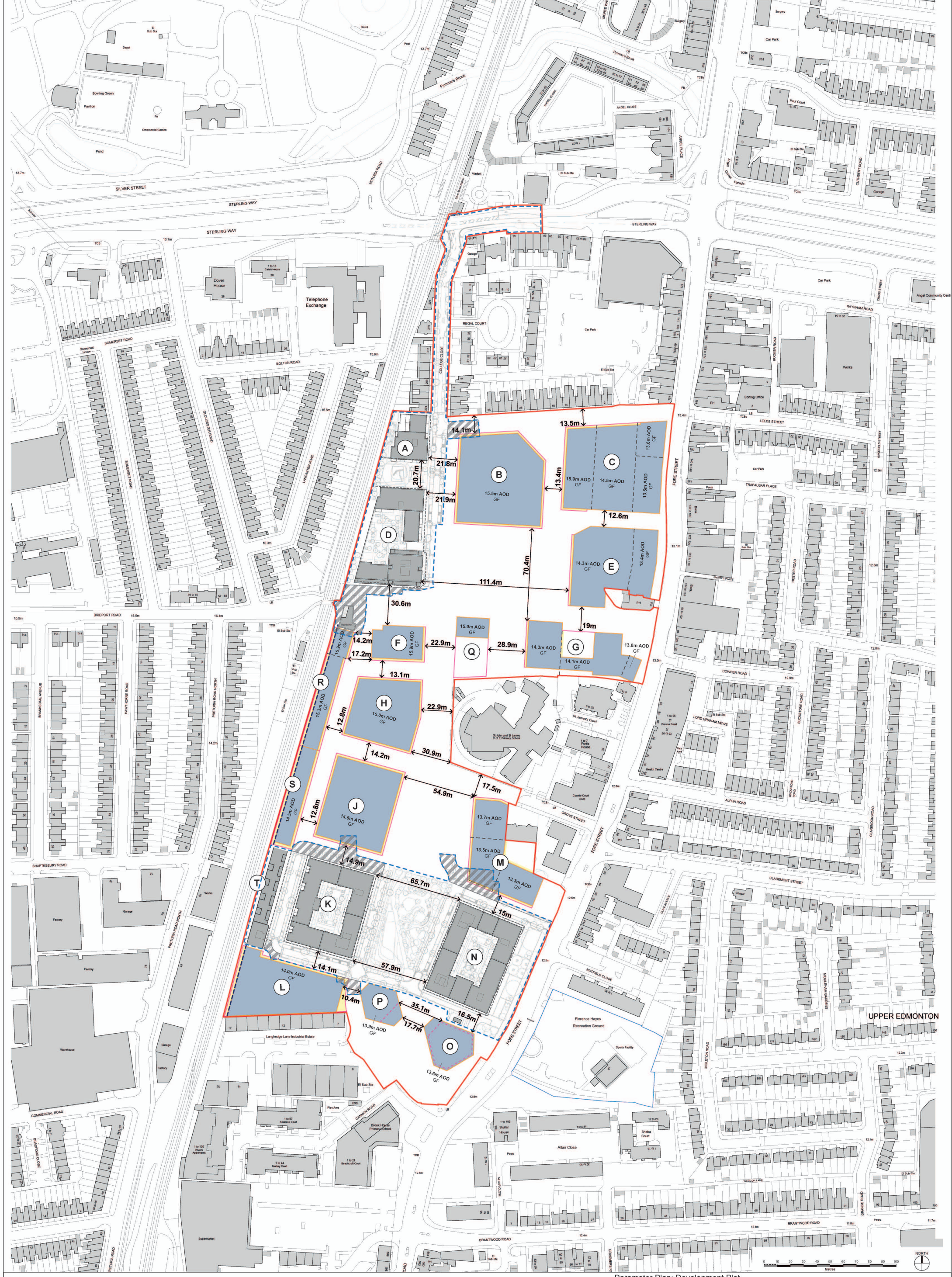
ENF-JSE
project number

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revision

AJK
originated by





Rev	Date	Drawn	Description
E	19.05.23	AJK	Draft Planning Issue
F	08.06.23	RRO	Gas governor added and block K updated
H	18.01.24	RRO	Design Freeze Issue
G	07.07.23	RRO	Planning Issue
J	01.03.24	RRO	Draft Planning Issue
N	05.04.24	RRO	Planning Issue

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Key	Description
	Hybrid Planning Application Site Boundary
	Extent of Detailed element of hybrid application
	Plot letters
	Extent of Development Plot Boundary
	Extent of temporary works within detailed application site boundary
	Land within applicant ownership
	Extent of Maximum Building Line / Footprint
	Plot boundary offset area to be used for privacy strip / balconies only - MIN 1.5m
	Minimum threshold distances
	3m Network Rail offset - no build zone to the west
	Xm Site Level +AOD

Parameter Plan: Development Plot Boundaries
drawing title

ENF-JSE-HTA-A-DR-XX-PL-PP05
drawing number

J
revision

LB Enfield
client / project

Joyce and Snell's Regeneration

1:2500
scale @ A3

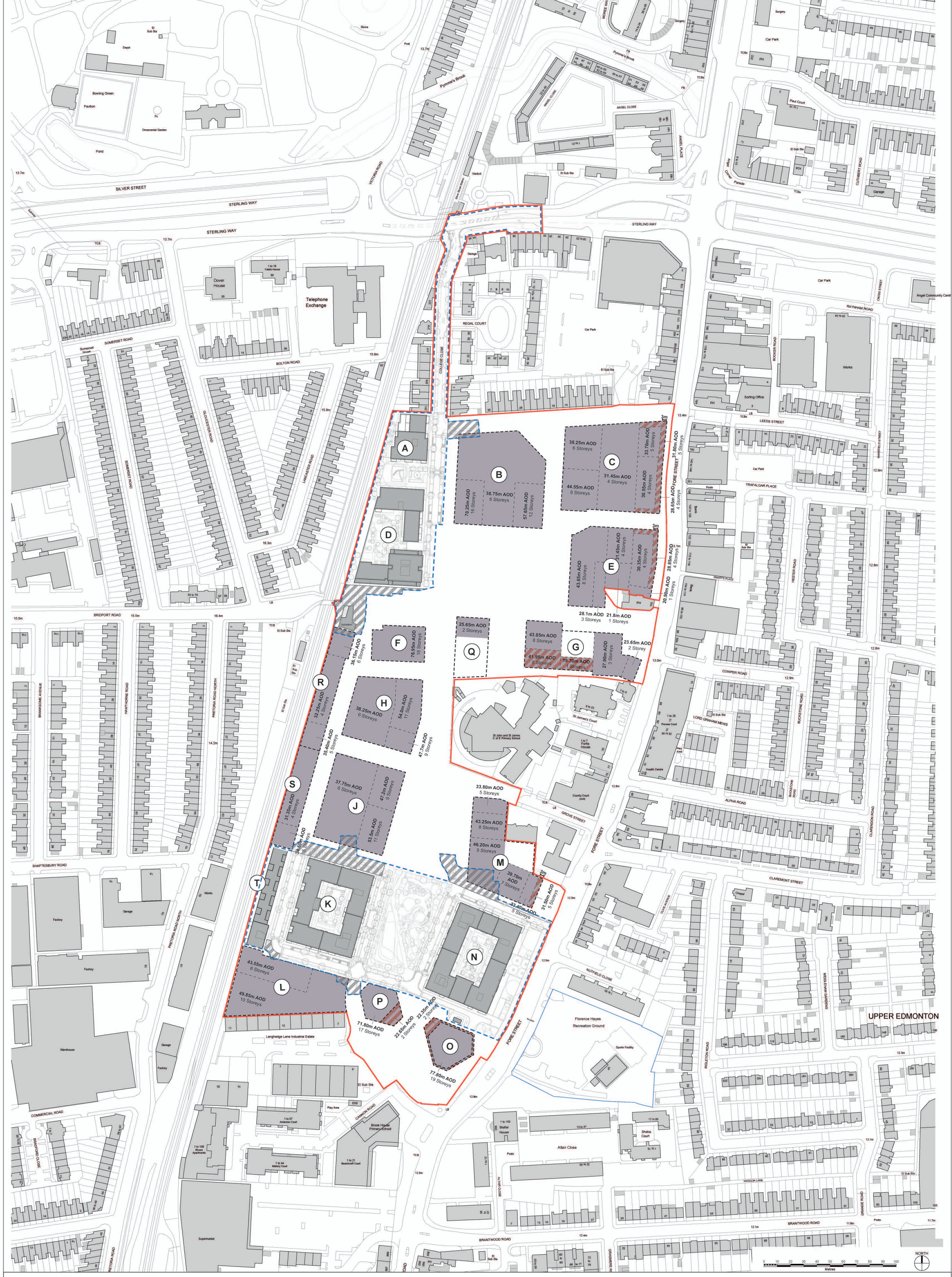
ENF-JSE
project number

AJK
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Rev	Date	Drawn	Description
E	19.05.23	AJK	Draft Planning Issue
F	08.06.23	AJK	Gas governor added and block K updated
H	18.01.24	RRO	Design Freeze Issue
G	07.07.23	RRO	Planning Issue
I	01.03.24	RRO	Draft Planning Issue
J	05.04.24	RRO	Planning Issue

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- Hybrid Planning Application Site Boundary
 - Extent of Detailed element of hybrid application
 - Plot letters
 - Extent of Plot Boundary
 - Plot with AOD height and illustrative storeys
 - Land within applicant ownership

All maximum heights include a 3m tolerance zone for overruns / plant / parapets / equipment etc SEE DESIGN CODE

Extent of plant exclusion zone
Extent of temporary works within detailed application site boundary

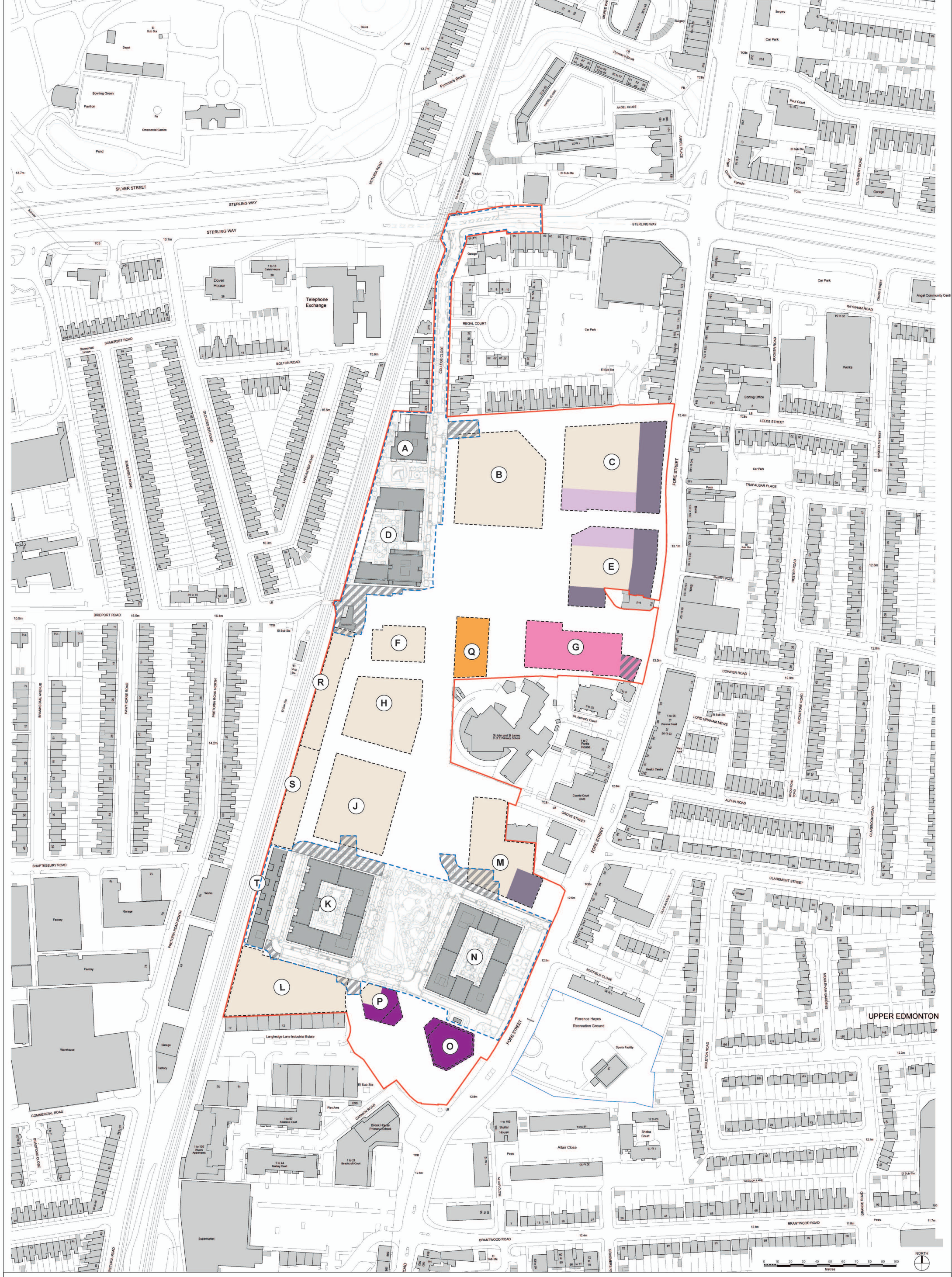
There is a 'no build zone' on blocks where no plant or overruns can be placed

LB Overruns 3.0m
Parapet 1.5m
Top of Storey height

Parameter Plan: Maximum Heights
drawing title
LB Enfield
client / project
Joyce and Snell's Regeneration

ENF-JSE-HTA-A-DR-XX-PL-PP06
drawing number
1:2500
scale @ A3
ENF-JSE
project number
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Rev	Date	Drawn	Description
E	19.05.23	AJK	Draft Planning Issue
F	08.06.23	RRO	Gas governor added and block K updated
H	18.01.24	RRO	Design Freeze Issue
G	07.07.23	RRO	Planning Issue
J	01.03.24	RRO	Draft Planning Issue
J	05.04.24	RRO	Planning Issue

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Key	Description
	Hybrid Planning Application Site Boundary
	Extent of Detailed element of hybrid application
	Plot letters
	Extent of Plot Boundary
	Extent of temporary works within detailed application site boundary
	Land within applicant ownership
	C3 - Residential
	E (a-e) (and ancillary C3 uses - no accommodation)
	E (a-b) / Sui Generis (p-q) (and ancillary C3 uses - no accommodation)
	E (g)
	E (f)
	F.1 (a-e) and F.2 (a-b)
	F.1 (a-e) and F.2 (a-b) ORE (a-b)

NOTE: Depths of non-residential land uses are indicative only and will include provision for residential cores

Parameter Plan: Land Uses - Ground Floor ENF-JSE-HTA-A-DR-XX-PL-PP07 J
drawing title drawing number revision

LB Enfield ENF-JSE AJK
client / project Joyce and Snell's Regeneration project number originated by

1:2500 scale @ A3

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Rev Date Drawn Description
 D 19.05.23 AJK Draft Planning Issue
 E 08.06.23 RRO Gas governor added and block K updated
 F 07.07.23 RRO Planning Issue
 G 18.01.24 RRO Design Freeze Issue
 H 01.03.24 RRO Draft Planning Issue
 I 05.04.24 RRO Planning Issue

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- Key**
- Hybrid Planning Application Site Boundary
 - Extent of Detailed element of hybrid application
 - Plot letters
 - Extent of Plot Boundary
 - Extent of temporary works within detailed application site boundary
 - Land within applicant ownership
 - Minimum extent of public realm
 - Minimum extent of civic square
 - Minimum extent of school square
 - Minimum extent of park space
 - Minimum extent of community garden space
 - Minimum extent of general open space
 - Minimum extent of MUGA

Parameter Plan: Open Space and Public Realm
 drawing title
LB Enfield
 client / project
Joyce and Snell's Regeneration
 status

ENF-JSE-HTA-A-DR-XX-PL-PP09
 drawing number
 1:2500
 scale @ A3

ENF-JSE
 project number

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