

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 21st October 2014

Report of

Assistant Director, Planning,
Highways & Transportation

Contact Officer:

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Ward:

Ponders End

Ref: P14-02066PLA

Category: Outline Application

LOCATION: Ponders End Industrial Estate, East Duck Lees Lane, Enfield, EN3 7SP

PROPOSAL: Redevelopment of part of existing industrial estate involving demolition of existing units and erection of replacement industrial units totalling approx. 31,552sqm of floor space for B1, B2 and B8 uses (OUTLINE with some matters reserved - Access).

Applicant Name & Address:

The Ponders End Trust C/O Scottish Widow
Ponders End Industrial Estate,
East Duck Lees Lane,
Enfield,
EN3 7SP

Agent Name & Address:

Planning Potential Ltd.
Ponders End Industrial Estate,
East Duck Lees Lane,
Enfield,
EN3 7SP

RECOMMENDATION:

That subject to the completion of a S106 Agreement to secure the obligations as set out in the report, the Head of Development Management / the Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions.

Note for Members:



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Scale 1:5000



1. Site and Surroundings

- 1.1 The application site has largely been cleared but was until recently home a group of industrial buildings located off East Duck Lees Lane. Prior to their demolition, which was approved via the prior approval procedure under reference P13-03556PRI, the buildings were in a derelict state, and although some of them were vacant, some were occupied. The floorspace of the units was 31,448sqm in B2-general industrial use.
- 1.2 The majority of the site lies within the designated 'Strategic Industrial Location' (SIL), with a small overlap onto the southern part covering a non-SIL area, and falls within one of the Council's Regeneration areas.
- 1.3 The River Lee Navigation adjoins to the east and beyond the King George Reservoirs, designated as a Site of Special Scientific Interest (SSSI). The Navigation forms the boundary to the Lee Valley Regional Park to the east, designated Green Belt.
- 1.4 The application site straddles East Duck Lees Lane, public adopted highway. Northampton Road and Jeffreys Road also comprise public adopted highway. Gates are located in public adopted highway at the north-east extent of East Duck Lees Lane.
- 1.5 No parking restrictions are in place currently on East Duck Lees Lane and Jeffreys Road. Northumberland Road and Alpha Road accommodate a majority of Double Yellow Line (At Any Time) restrictions. A cycle track runs along the eastern footway of Mollison Avenue. The site is served, via Mollison Avenue, by the bus route no491 with two bus stops sited between the East Ducklees Lane and Jeffreys Road junctions. The site's PTAL varies between 1a and 2 (i.e Very Poor to Poor).
- 1.6 The site has an area of 8.46 hectares.

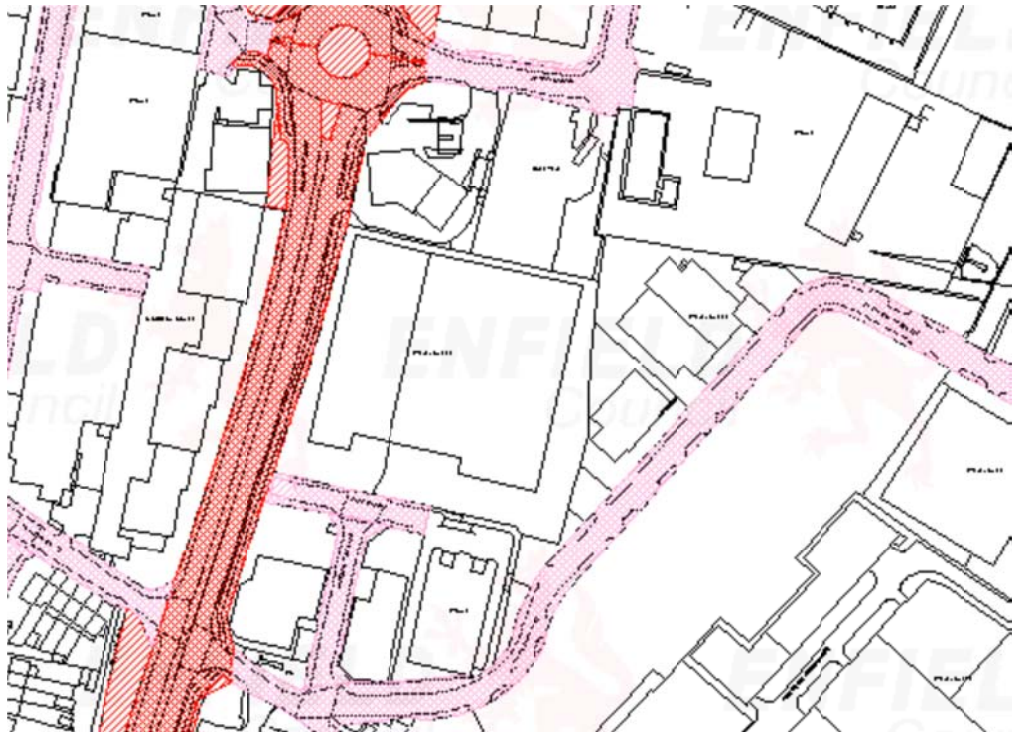
2. Proposal

- 2.1 This is an outline application for the redevelopment of part of the existing industrial estate involving demolition of existing units and erection of replacement industrial units totalling approx. 31,552 sqm of floor space for B1, B2 and B8 uses (outline with all matters reserved except the means of access). This is an increase of 104 sqm of floor space compared to the floor space of the units that were previously on site.
- 2.2 It is proposed that the development will be delivered in phases although the details are not known – a parameters led approach is likely to be followed for this application, with specific sub-proposals being dealt with by Reserved Matters as prospective occupiers come forward.

2.3 The two indicative options shown are:

- Option 1 (Masterplan 1) Proposals comprise of four separate units, 300 parking spaces, 41 HGV spaces and 40 HGV loading bays, with no disabled parking bays shown.
- Option 2 (Masterplan 2) Parking proposals comprise of three units, 316 spaces, 67 HGV spaces and 40 loading bays, with no disabled spaces.

2.4 A new link road is proposed connecting East Duck Lees Lane and Jeffreys Road (to the north). The proposed development site is located along the eastern limit of the publically maintained highway of Mollison Avenue. The application is accompanied by a Transport Assessment (TA). Below is an extract of a plan showing the extent of the publicly adopted highway near the development site.



[Plan Showing Extent of Publicly Adopted Highway]

2.4 The applicant has stated as part of their submission that the proposed redevelopment of Ponders End Industrial Estate will bring forward a 'successful and viable commercial scheme' on a safeguarded industrial site. Following the redevelopment of the site, the area will be rebranded as 'Enfield Distribution Park'. The applicant notes that this is the only large scale industrial site available within the Enfield Borough and the proposed development represents a significant investment in the local economy which is realistic and deliverable as well as being of high quality and respectful of its context and future users.

3. Relevant Planning Decisions

- 3.1 P13-03556PRI Demolition of industrial Units B - M and Units 2 – 9 – Granted 20/12/2013
- 3.2 P13-03088PRI Demolition of industrial Units B - M and Units 2 – 9 Withdrawn – 15/11/2013
- 3.3 Officers did engage in pre-application discussions with the applicant. The conclusion was that whilst officers raised no objection in principle to the redevelopment of this site, there were matters that would need to be addressed through the submission of the application, such as the nature of the commercial uses, design and layout issues, and the improvements to connectivity and public realm that could be delivered through the new development.

4. Consultations

4.1 Statutory and non-statutory consultees

Biodiversity Officer

- 4.1.1 No objection subject to conditions and has commented that from a biodiversity perspective Option 2 – with a more broken-up building footprint – is strongly preferred as this will allow for provision of wildlife-friendly landscaping which can therefore provide wildlife corridors throughout the site.

Traffic and Transportation

- 4.1.2 No objection, subject to planning conditions and obligations and contributions to be secured via a Section 106 Agreement.

Environmental Health

- 4.1.3 No objection subject to conditions.

Lee Valley Regional Park Authority

- 4.1.4 No objection in principle, although it is recommended that the following be achieved in the final scheme:
 - a) A belt of vegetation alongside the proposed riverside walkway that would act to visually screen the proposed industrial units when viewed from the Regional Park on the opposite bank of the Navigation;
 - b) That the layout and heights of the proposed units do not appear visually overbearing when viewed from the Regional Park in the east, in this regard the visual permeability provided by Indicative

Layout 1 is far preferable to the long single side elevation adjacent to the Navigation shown in Indicative Layout 2;

- c) The recommendations for habitat enhancement of protected species and invasive plant species; in particular the preservation of a dark corridor, with ecological enhancement, adjacent to the Navigation; and
- c) It is recommended that CIL monies be provided for projects set out in adopted the Authority's PDF proposals for Areas 5.A.1 and 5.A.2 which border the application site.

Arboricultural Officer

- 4.1.5 No objection in principle to this proposed development. However, a wider landscaped 'buffer' needs to be provided along the river boundary. Currently it looks like the proposed buildings on this part of the site are too close to be able to provide an adequate landscaped buffer.

Employment and Training

- 4.1.6 No objection, but states there is a need for an Employment and Training Strategy to be secured via a Section 106 Agreement.

Urban Design Officer

- 4.1.7 Objection, due to concerns over indicative layouts proposed.

Planning Policy

- 4.1.8 No objection.

Metropolitan Police

- 4.1.9 No objection, but comments that the development should adopt the principles and practices of 'Secure by Design' and complies with the 3D Secured by Design Commercial guide and tool kit.

Sustainable Design Officer

- 4.1.10 Objection to application as submitted. Advises that in accordance with policies SO2 and CP40 of the Core Strategy as well as the emerging NEEAAP, development within this location is of critical strategic importance and is required to deliver exemplary sustainable design and construction flagship development. This has not been sufficiently engaged with by the applicant and needs to be addressed. The applicant has submitted additional / revised details on this matter which are currently being assessed.

Thames Water:

4.1.12 No objection subject to conditions.

Canal and River Trust

4.1.13 No objection in principle, but comments that neither Option 01 nor 02 significantly enhances the waterside environment of the River Lee Navigation, or provide active frontages that would help link with and animate the waterside. The Canal and River Trust would prefer the layout of Option 01, which breaks up the mass of the development against the water. However, they consider both proposals to be situated too close to the waterside to be able to provide a meaningful landscape buffer that would screen the development from the Navigation and towpath. Note that some amenity landscaping is suggested between the buildings and the Navigation, and would support some active space adjacent to the waterway environment that would allow employees to enjoy the waterspace, as well as provide some passive surveillance of the towpath. The Canal and River Trust would also support windows from any office space being located on the waterside elevation, to provide further relief to the structures and passive surveillance.

Natural England

4.1.14 No objection subject to conditions.

English Heritage

4.1.15 No objection subject to conditions.

Environment Agency

4.1.16 Objection to application as submitted. The applicant has submitted additional / revised details to address the concerns identified which are currently being assessed. An update will be provided at the meeting.

4.2 Public response

4.2.1 The application was referred to 29 surrounding properties and a site notice was posted in the site (21 days expired 04/08/2014). One comment was received, raising the following concerns:

– Concern over the potential impact on the access driveway into and out of adjacent site at 102 East Duck Lees Lane.

5. Relevant Policy

5.1 National Planning Policy Framework (NPPF)

- 5.2 The National Planning Policy Framework (NPPF) published in March 2012 allowed Local Planning Authorities a 12 month transition period to prepare for the full implementation of the NPPF. Within this 12 month period Local Planning Authorities could give full weight to the saved Unitary Development Plan policies (UDP) and the Core Strategy, which was adopted prior to the NPPF. The 12 month period has now elapsed and as from 28th March 2013 the Council's saved UDP and Core Strategy policies will be given due weight in accordance to their degree of consistency with the NPPF.
- 5.3 The Development Management Document (DMD) policies have been prepared under the NPPF regime to be NPPF compliant. The Submission version DMD document was approved by Council on 27th March 2013 and has now successfully been through examination. It is expected that the document will be adopted at full Council in November 2014. The DMD provides detailed criteria and standard based policies by which planning applications will be determined, and is considered to carry significant weight.
- 5.4 National Planning Practice Guidance
- 5.5 On 6th March 2014, the Department for Communities and Local Government (DCLG) launched the National Planning Practice Guidance (NPPG) to consolidate and simplify the previous suite of planning practice guidance. Of particular note for Members, the guidance builds on paragraph 173 of the NPPF stating that where an assessment of viability of an individual scheme in the decision-making process is required, decisions must be underpinned by an understanding of viability, ensuring realistic decisions are made to support development and promote economic growth. Where the viability of a development is in question, local planning authorities should look to be flexible in applying policy requirements wherever possible.
- 5.6 The policies listed below are considered to be consistent with the NPPF and therefore it is considered that due weight should be given to them in assessing the development the subject of this application.
- 5.7 The London Plan (subject to REMA)
- Policy 2.6 – Outer London: vision and strategy
 - Policy 2.7 – Outer London: economy
 - Policy 2.8 – Outer London: transport
 - Policy 2.14 – Areas for regeneration
 - Policy 4.1 – Developing London's economy
 - Policy 4.3 – Mixed use development and offices
 - Policy 4.4 – Managing industrial land and premises
 - Policy 5.1 – Climate change mitigation
 - Policy 5.2 – Minimising carbon dioxide emissions
 - Policy 5.3 – Sustainable design and construction

Policy 5.5 – Decentralised energy networks
 Policy 5.6 – Decentralised energy in development proposals
 Policy 5.7 – Renewable energy
 Policy 5.9 – Overheating and cooling
 Policy 5.10 – Urban greening
 Policy 5.11 – Green roofs and development site environs
 Policy 5.12 – Flood risk management
 Policy 5.13 – Sustainable drainage
 Policy 5.15 – Water use and supplies
 Policy 5.18 – Construction, excavation and demolition waste
 Policy 5.21 – Contaminated land
 Policy 6.9 – Cycling
 Policy 6.10 – Walking
 Policy 6.12 – Road network capacity
 Policy 6.13 – Parking
 Policy 7.1 – Building London’s neighbourhoods and communities
 Policy 7.2 – An inclusive environment
 Policy 7.3 – Designing out crime
 Policy 7.4 – Local character
 Policy 7.5 – Public realm
 Policy 7.6 – Architecture
 Policy 7.19 – Biodiversity and access to nature
 Policy 7.24 – Blue Ribbon Network
 Policy 7.27 – Blue Ribbon Network: supporting infrastructure and recreational use
 Policy 8.2 – Planning obligations

5.8 Core Strategy

SO1	Strategic growth areas
SO2	Environmental sustainability
SO6	Maximising economic potential
SO8	Transportation and accessibility
SO9	Natural environment
SO10	Built environment
CP13	Promoting economic prosperity
CP14	Safeguarding strategic industrial locations
CP16	Taking part in economic success and improving skills
CP20	Sustainable energy use and energy infrastructure
CP25	Pedestrians and cyclists
CP28	Managing flood risk through development
CP30	Maintaining and improving the quality of the built environment
CP31	Built and landscape heritage
CP32	Pollution
CP33	Green Belt and countryside
CP35	Lee Valley Regional Park and waterways
CP36	Biodiversity
CP40	North East Enfield
CP46	Infrastructure contributions

5.9 Unitary Development Plan

After the adoption of the Core Strategy, a number of UDP policies are retained as material considerations pending the emergence of new and updates policies and development standards within the Development Management Document. The following are of relevance

(II)GD3	Character and design
(II)GD6	Traffic generation
(II)GD8	Site access and servicing
(II)E4	Special needs of small firms
(II)E9	Non-commercial and industrial uses
(II)T13	Creation or improvement of accesses

5.10 Development Management Document: Submission Version

DMD19	Strategic Industrial Locations
DMD23	New Employment Development
DMD37	Achieving High Quality and Design-Led Development
DMD39	The Design of Business Premises
DMD44	Preserving and Enhancing Heritage Assets
DMD45	Parking Standards and Layout
DMD47	New Roads, Access and Servicing
DMD49	Sustainable Design and Construction Statements
DMD50	Environmental Assessment Methods
DMD51	Energy Efficiency Standards
DMD59	Avoiding and Reducing Flood Risk
DMD61	Managing Surface Water
DMD76	Wildlife Corridors
DMD77	Green Chains
DMD78	Nature Conservation
DMD79	Ecological Enhancements
DMD83	Development Adjacent to the Green Belt

5.11 Draft North East Enfield Area Action Plan (NEEAAP)

Policy 12.1 Ponders End Waterfront

5.12 Other Material Considerations

Upper Lee Valley Opportunity Area Planning Framework
LB Enfield Industrial Estates Strategy Draft Final Report
Enfield Mini Holland Bid Document
London Plan: the Mayor's Ambient Noise Strategy
London Plan: the Mayor's Air Quality Strategy
London Plan: the Mayor's Transport Strategy;
Land for Transport Functions SPG
London Plan: Mayoral Community Infrastructure Levy

6. Analysis

6.1 The main issues to consider are as follows:

- i. Principle of development;
- ii. Layout, form and scale of development, including impact upon adjacent Greenbelt and River Lee Navigation;
- iii. Amenity of neighbouring properties;
- iv. Traffic and Transportation matters;
- v. Sustainable design and construction;
- vi. Landscaping and biodiversity;
- vii. Archaeology;
- viii. Flood risk and contamination;
- ix. Planning Obligations; and
- x. Community Infrastructure Levy
- xi. Other matters

6.2 Principle of development

6.2.1 As set out above, whilst the site is currently vacant, its most recent use was industrial. The majority of the site lies within the designated 'Strategic Industrial Location' (SIL), with a small overlap onto the southern part covering a non-SIL area, and falls within one of the Council's Regeneration areas.

6.2.2 Core Policy 14 states that the Council will safeguard Strategic Industrial Locations. In addition, Policy DMD 19 of the Submission Version of the Development Management Document states that only proposals involving general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities and other industrial related activities including green industries and management of waste, will be permitted within 'Preferred Industrial Location' (PIL).

6.2.3 Policy 12.1 of the Draft North East Enfield Area Action Plan (NEEAAP) relates to this area and is referred to as the Ponders End Waterfront. The Proposed Submission NEEAAP was published for consultation between the 3rd June to 14th July 2014 and the applicant's agent, Planning Potential, has made representations to the Council as part of this. Policy 12.1 of the current iteration of the NEEAAP sets out that Ponders End Waterfront, of which this is one of the key development sites, is a "major opportunity for employment-led mixed-use development that connects the waterfront back to the wider NEE area, creating a distinctive place and a valuable leisure resource for local

people.” A number of the key principles listed in the policy are applicable to this application, and include:

- redevelop the area for an employment-led mix of uses in high quality new buildings that collectively create a distinctive new quarter within the NEE area;
- ensure that active building frontages overlook the waterways and streets and spaces within the development;
- provide a pedestrian / cycle route along the waterways;
- create views through the development to the water and to the reservoir embankments beyond;
- create a clear pedestrian / cycle ‘circuit’ that connects the two railway crossings, the waterside walks, Alma Road and South Street together;
- ensure that the redevelopment of South Brimsdown allows for future connections to the north, especially for pedestrians and cyclists.

Figure 12.2 of the NEEAAP identifies that, in relation to the above key principles, a new bridge crossing is required to improve connectivity and provide leisure routes, linking into the new riverside walk on the western side of the Lee. The location identified for this new bridge is immediately due south of the application site.

- 6.2.4 Accordingly, it is considered that the redevelopment of the site for a combination of B1, B2 and B8 uses is acceptable in planning policy terms insofar as it is consistent with the overarching thrust of the policy for an employment led scheme. However, as set out above, policy 12.1 of the NEEAAP sets out very specific requirements that any development on this site should adhere to.
- 6.2.5 It is noted that although the layout for the proposed development shows a scheme of 3 or 4 commercial warehouse units of approximately 31,552 sq m gross for B1, B2 and B8 uses, no details have been provided to demonstrate what level of employment yield the scheme would generate compared with the current operational trends of existing business, and it is noted that details have not been submitted with the application within the Planning Statement. Whilst information in this regard would have been helpful, there is no explicit planning policy that identifies that an uplift in employment yield versus the existing baseline is required to make the development acceptable.
- 6.2.6 It is welcomed that pre-application comments regarding Southern Brimsdown (the site to the immediate south) have been noted and the application details indicates how this site (which for most part is in the applicant’s ownership) could potentially be developed in the future. The approach accords with the key principles of NEEAAP Policy 12.1 Ponders End Waterfront. However, the detailed matters of the design and layout of the scheme are assessed in full below.

6.2.7 On the basis of the above, it is considered that the principle of the development is acceptable.

6.3 Layout, form and scale of development, including impact upon adjacent Green Belt and River Lee Navigation

6.3.1 In terms of the relevant planning policies that set out the importance of good design, the NPPF (2012) continues to emphasise that:

“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. (Para 56)

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. (Para 57)

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment. (Para 61)

Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. (Para 64)

Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits). (Para 65)”

6.3.2 The London Plan (2011) policies 7.4B and 7.6B set out the design principles that all boroughs should seek to ensure for all development proposals. The London Plan (2011) policy 7.4B states, inter alia, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. The London Plan (2011) policy 7.6B states, inter alia, that all development proposals should; be of the highest architectural quality, which complement the local architectural character and be of an appropriate proportion, composition, scale and orientation. Development should not be harmful

to amenities, should incorporate best practice for climate change, provide high quality indoor and outdoor spaces, be adaptable to different activities and land uses and meet the principles of inclusive design.

- 6.3.3 Policy DMD83 indicates that development in close proximity to the Green Belt will only be permitted if there is no increase of the visual dominance and intrusiveness of the built form by way of height, scale and massing, there is a clear distinction between the Green Belt and urban areas; views and vistas from the Green Belt into urban areas and vice versa, especially at important access points, are maintained. This policy is important because the land to the immediate east is designated as Green Belt.
- 6.3.4 Policy DMD37 sets out criteria for 'Achieving High Quality and Design-Led Development' and policy (II) GD3 of the UDP aims to ensure that high standards of design are taken into consideration, with reference to the boundary treatment of the property, the use of materials and the proposals siting, layout, alignment, spacing, height, bulk and massing.
- 6.3.5 This is an outline application with all matters reserved except for means of access. However, the applicant is seeking permission for the provision of a maximum of 31,552 sqm of development on the site. Accordingly, the applicant has sought to demonstrate how this level of development could be accommodated on the site. This has generated the two illustrative options that are presented as part of this application. Whilst these are of assistance, they are purely illustrative and should planning permission be granted, conditions would be attached requiring the submission of full details of the siting, layout and design of any future buildings to be erected on the site.
- 6.3.6 At pre-application stage, officers advised that the principle of redevelopment was acceptable, and whilst maintaining a similar level of floorspace, so acknowledging that this would likely result in fewer buildings but of a larger scale than what is existing, nonetheless raised concern in relation to the size and scale of these buildings, and highlighted the need for them to respond to the local context and constraints. Other than the surrounding residential development, it is considered the main constraint is the adjacent River Lee Navigation to the east of the site.
- 6.3.7 In response to this, and in formulating the design of the scheme, the applicant has highlighted that this has to have strong regard to the operational needs of the potential occupiers, and they are likely to require the following:
- A 24-hour operation, to provide flexibility and efficiency, whilst also giving opportunity for traffic associated with the development to be spread out across peak / off peak hours.

- Initial market demands indicate that units in these sectors and in this vicinity, are sought with footprint areas between 5,000m² and 20,000m². Whilst these figures may not be a precise representation of footprint demands, they give an indication of the scope of the units which may be developed.
- Within these unit footprints, it is likely that the following functions will be provided: Single-storey warehouse areas, left open plan for racking and storage installations; Administration and operational offices; Plant areas.
- Service Yards with HGV parking, vehicle circulation and HGV turning.
- Associated vehicle barriers/gates and secure cycle and / or motorcycle storage.

6.3.8 In terms of their design approach, the applicant has advised that:

“The design principles of B2 General Industrial & B8 Storage / Distribution are based on efficiency and operation, wherein one or both of the longer elevations are utilised for inbound and outbound loading. Within these long yard facing elevations, the usage of internal floor space is then predetermined as marshalling (temporary storage), a circulation zone and then block storage in back to back racking with aisles. Given the rigid functionality and performance optimisation of these building types, rectangular forms with an approximate ratio of 2:1, are the predominant building footprint for type B developments.

These sectors are dominated by buildings with critical internal heights (usually between 9-15m to underside of haunch) to suit operational requirements, based on specific capacity / volumetric requirements and industry standard equipment and storage modules. The heights of type B8 usage buildings are generally dictated by the pallet racking heights within the building, which in turn are usually maximised to enable efficient storage volumetrics within a footprint. The footprint of B8 usage buildings are usually determined by optimising portal frames, where the spacing of these frames are designed around housing an effective distribution of loading doors, usually housed along one or two of the long building elevations. In order to minimise the actual roof heights of the buildings it is proposed that they incorporate a shallow pitched roof, with a curved apex, rather than fixed point ridge. The combination of the above in conjunction with a parapet-less design, can reduce the perceived and actual building height.”

6.3.9 The results of this are the two illustrative masterplans, which are set out below:

Illustrative Masterplan 01:-



Illustrative Masterplan 02:-



6.3.10 Having reviewed the submission and consistent with the comments given at pre-application stage, a number of concerns have been raised with the two master plans. A summary of the concerns is set out below:

- The proposed storage/industrial units are loosely planned across the site with large areas of hard standing for service yards and car parking, visible from the street and riverside.
- The proposed buildings in both master plan options, especially the ones overlooking the River Lee Navigation, would have very big footprints which would make them look bulky and overbearing.
- The proposed development fails to design a well-connected network of streets and is perceived as bland, unattractive, unwelcoming and unsafe to pedestrian and cyclist.
- The street network proposed for the site should ideally distinguish between streets for freight vehicles and those that are for general motor vehicle traffic, cyclist and pedestrians.
- The master plans indicate pedestrian alleyways which are considered unattractive and unwelcoming for pedestrians.

- It is not clear why the existing access route to the south of the site is not being retained and extended to the riverside for all the street users, rather than proposing a new convoluted route that becomes narrow alleyway towards the riverside, accessible to only pedestrians. This arrangement further fails to open up views and vistas of the riverside.
- Concern over potential non-compliance with Secure by Design principles.
- No landscape strategy has been submitted to assess the scheme for different aspects and features of landscaping and public realm such as traffic management measures, street lighting, areas of soft/ hard landscaping, paving materials/ textures/ colour/ patterns, etc.
- Ideally the entrances to the site from Mollison Avenue to the south and Jeffeys Road to the north should be well defined by a high quality landscaped area that contributes to marking the gateways into the development.
- Along the eastern boundary an extensive woodland type of landscape or green mounds could be considered to screen the site to minimise the visual impact of the buildings from Lee Valley Regional Park. Along the western boundaries again the development should be set back appropriately and screened with tree planting. Tree planting and hedges defining the parking and circulation areas would also 'green' the layout.
- No Landscape and Visual Impact Assessment (LVIA) demonstrating the scale of the new buildings from key viewpoints vistas has been submitted, and concern is raised in relation to the proposed 9-15m high building height on the character of the area, in particular the Lee Valley Regional Park.
- General concerns about the architectural approach and the elevational design of individual buildings, especially where it fails to break down the scale of the building through its massing, form and materials
- The long facades of the buildings need to be articulated in such a way that it will diminish the visual impact of their scale and bulk.

6.3.11 It is noted that the Lee Valley Regional Park Authority have also commented on two specific parts of the scheme, these being the relationship to the riverside walk and ensuring that this space is large enough to accommodate sufficient landscaping to screen the new buildings, and that the layout and heights of the proposed units do not appear visually overbearing when viewed from the Regional Park in the east. In this respect, the Lee Valley Regional Park Authority comment that the long single side elevation adjacent to the Navigation shown in Master plan 02 is the less preferred of the two options put forward at this stage.

6.3.12 The Canal and River Trust has commented that in their view neither of the two suggested masterplans significantly enhances the waterside environment of the River Lee Navigation, or provides active frontages that would help link with and animate the waterside, as required by the NEEAAP, considering both proposals to be situated too close to the

waterside to be able to provide a meaningful landscape buffer that would screen the development from the Navigation and towpath.

6.3.13 The Canal and River Trust note that some amenity landscaping is suggested between the buildings and the Navigation, and support some active space adjacent to the waterway environment that would allow employees to enjoy the waterspace, as well as provide some passive surveillance of the towpath. The Canal and River Trust have also advised that they would also support windows from any office space being located on the waterside elevation, to provide further relief to the structures and passive surveillance.

6.3.14 In response to the concerns raised, the applicant has sought to emphasise that it is 'critical' to bear in mind that the current application is in outline only and that the layout will be dealt with under future Reserved Matters applications. The applicant highlights that the masterplans are indicative and "illustrate how the quantum of floorspace applied for can be accommodated on the site, taking account of the applicant's knowledge of operators requirements of such sites." However, whilst highlighting the indicative nature of the masterplans, the applicant also states they disagree with the vast majority of the comments of made, stating that in their view, each of the masterplans submitted would, if built, "create an attractive, modern and safe environment ensuring the safety of staff and visitors whilst representing a considerable visual improvement of the site."

6.3.15 It is noted that the applicant's agent made representations to the Council as part of the examination of the DMD, and that following the Examination Hearings of this, within the Schedule of Proposed Main Modifications released for public consultation in May-June 2014, the Planning Inspector revised draft policy DMD 39 'The Design of Business Premises to give greater importance to 'viability and the operational requirements of the proposed use'. The applicant states that "this is particularly important for the proposed warehouse units which will be designed to fit the occupier's requirements and will be determined under future Reserved Matters applications. It is necessary that this emphasis on viability and operational requirements is considered in the determination of this application and future Reserved Matters applications, given the progression of this policy document."

6.3.16 Noting both sides of the arguments above, the fact that this is an outline application must be taken into account and that the Council is not approving the layout, appearance or the sizes of the subject buildings. However, there are a number of key design criteria that need to be met in order to achieve a scheme of suitable quality, create an attractive place for people to work, to create safe and attractive routes into and through the site to the waterfront to enhance its accessibility for future and existing employees and the wider public, with the public health benefits that come from having safe and attractive environments which encourage people to walk and cycle,

having regard to the Council's priorities for this area. Notwithstanding the comments of the applicant in terms of their approach, and the need for flexibility to take account of the different potential operators, it is considered that the illustrative masterplans submitted do not achieve the key design criteria and so are not acceptable from that perspective. As such, it is considered important that any Reserved Matters applications that are submitted pursuant to an outline planning permission on this site to have regard to the following, and for these matters to be identified and addressed through the submission of a detailed design report:

- The provision for a landscaped walk/cycle route of a minimum width of 8m adjacent to the Navigation, providing the opportunity to soften the impact of such buildings and enhance the river setting. This would also provide definition between the adjacent Green Belt and the urban setting of the industrial estate, having regard to Policy DMD83. .
- Suitable interaction with Mollison Avenue in terms of the positioning and size of the buildings in this location and the provision for sufficient landscaping to create a positive street environment.
- Ensure that active building frontages overlook the waterways and streets and spaces within the development – this means that the offices that support any new large industrial location should, in part be located so that they overlook this area to the east of the site so as to prevent this from becoming a dead frontage.
- Improved pedestrian and cycle links through the site from Mollison Avenue to the River; the links must be well lit, open and overlooked and at least 3m in width in order to provide a safe and attractive environment.
- Create views through the development to the water and to the reservoir embankments beyond.
- The bulk, scale and mass of buildings are broken down through careful design, detailing and the use of an appropriate palette of materials.

6.3.17 Whilst it is the case that the Council must accept that the scheme will be driven by the needs of the future occupiers, and as such the units are likely to be of a large size (9 to 15m in height as the applicant highlights), with the provision of the extension to the riverside walk along the western side of the River Lee Navigation to connect into the adjacent sites' walkways, an appropriate relationship to Mollison Avenue and pedestrian and cycle friendly links through the site to create the access to the river, it is considered that the scheme would be of a suitable quality, such that it would be consistent with the NEEAAP and other Development Plan policies.

6.3.18 It is on this basis that the application is considered to acceptable. As the application is in outline, and bearing in mind the nature of the site and the likely future occupiers, it is likely that the scheme would come forward in phases, and so the condition(s) requiring the approval of the

reserved matters of the appearance, landscaping, layout and scale of the development will be worded to reflect this.

6.4 Impact of Neighbouring Properties

6.4.1 Policies 7.6 of the London Plan and CP30 of the Core Strategy seek to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity.

6.4.2 Given the siting of the building in relation to the site boundaries, it is considered that the proposed development will have no discernible impact on nearby residential occupiers.

6.5 Traffic and Transportation matters

6.5.1 The NPPF sets out the overarching planning policies on the delivery of sustainable development through the planning system. It emphasises the importance of reducing the need to travel, and encouraging public transport provision to secure new sustainable patterns of transport use. The London Plan (2011) and the adopted Core Strategy (2010) encourage and advocate sustainable modes of travel and requires that each development should be assessed on its respective merits and requirements, in terms of the level of parking spaces to be provided etc.

6.5.2 As noted above, whilst the application is in outline, the applicant is seeking approval for the means of access into the site and therefore this is a matter for determination at this stage. The Council's Traffic and Transportation department has reviewed the application and whilst initially raising concerns with certain elements of scheme (in particular some of the transport related documents) is now satisfied with it, and so is raising no objection.

6.5.3 Traffic and Transportation department raised concerns with the submitted Transport Assessment in terms of the trip generation for a flexible B1, B2 and B8 permission, where, although arguably somewhat unlikely, it is feasible that a Reserved Matters scheme could come forward that would be wholly B1 office space, which generates a higher number of vehicle movements. In response to this, the applicant has undertaken an additional modelling exercise for a B1 only scheme, which raises concerns in terms of the volume of pedestrian and vehicular traffic that would be generated. In order to control this impact the applicant has advised that they are willing to accept a cap on the proportion of B1 floorspace on the site. A cap of 15% B1 across the site would limit the potential traffic generation to a level that could be accommodated on the surrounding highway network without significant impact. A condition to this effect is recommended

- 6.5.4 As the access proposals onto the main road network are to be approved in detail, the applicant has submitted detailed drawings of the proposed changes to the Jeffreys Road and East Duck Lees Lane junctions with Mollison Avenue, along with accompanying stage 1 Road Safety Audits and amendments to parking regulations. Traffic and Transportation have advised that these details are acceptable and would help ensure there is improved access to the site.
- 6.5.5 The following highway improvements are proposed: provision of increased radii at the junction with Mollison Avenue, provision of a new Link/Access Road between Jeffreys Road and East Duck Lees Lane, an improved alignment, visibility and radii at the Northampton Road/East Duck Lees Lane junction and a new pedestrian link into the site from Mollison Avenue to East Duck Lees Lane via Alpha Road. The new road link would be built to an adoptable standard, and could therefore be adopted by the Council at some point in the future if it elects to do so. These proposed improvements would need to be secured by way of S106 and S278 agreement and include provision of a new link road between Jeffreys Road and East Duck Lees Lane to be designed and built to an adoptable standard, an improved alignment, visibility and radii at the Northampton Road/East Duck Lees Lane junction and a new pedestrian link into the site from Mollison Avenue to East Duck Lees Lane via Alpha Road.
- 6.5.6 The Council initially sought to reroute the 491 bus along the proposed new link road in order to better serve the site and encourage more sustainable travel patterns. The proposed bus route through the site was resisted by the applicant and would also require separate agreement from London Buses. Therefore an alternative package of measures was developed in order to offer the same level of incentive to use sustainable modes.
- 6.5.7 Traffic and Transportation have also highlighted the importance of the need for improved pedestrian and cycle links through the site from Mollison Avenue to the River to the south of indicative 'unit 3', as this would provide better access to the bus stops on Mollison Avenue, to the north of 'unit 4' and to the south of 'unit 2'. The links must be well lit, open and overlooked where possible and at least 3m in width in order to provide a safe and attractive environment.
- 6.5.8 A financial contribution is also required to the planned bridge connection across the River Lee to the south of the site. The Council has considered the potential contributions likely to be achievable from other nearby sites as well as capital funds and other sources of grant and an appropriate contribution is being sought from this site to help reduce the impacts of the development on the highway network by encouraging sustainable travel. The bridge would also have broader public benefits and therefore, as set out, funding from non-development sources would need to be secured.

- 6.5.9 These measures should be secured by way of S106 and are required in order to ensure workers are able to travel to the site using sustainable modes of transport. Along with the proposed Travel Plan measures this would also mean car parking can be reviewed and reduced as detailed proposals come forward, while recognising the operational requirements of the uses proposed. This would help to minimise the impact of the proposals on the road network.
- 6.5.10 It is noted that no detail of the cycle parking has been proposed, which is acceptable given the outline nature of the application. A condition is therefore recommended to secure cycle parking provision in accordance with the standards set out in the Further Alterations to the London Plan.
- 6.5.11 One car parking space per 100sqm is proposed, which accords with the London Plan 2011 car parking standards for B1 uses (worst case). A lower car parking provision however should be provided for B2-B8 uses so as the scheme does not undermine the Travel Plan aspirations and given improvements to pedestrian and cycle environment. Electric charging points would also be provided to London Plan standards together with motorcycle parking and disabled parking. The details of design of the car parks, including number of spaces, turning facilities and electric charging points are recommended to be secured by planning condition.
- 6.5.12 Traffic and Transportation have advised that there are no transport objections to the stopping up of the eastern end of East Duck Lees Lane.
- 6.5.13 An area of concern that has been raised by the occupier of the adjacent site is that of the access into their site. Planning permission (ref. TP/05/1616/REN2) has been granted at the adjacent site for the demolition of the existing building and erection of warehouse for B8 use with ancillary offices (Outline application-layout and means of access approved). This development, which was approved in 2005, permission renewed in 2008 and then again earlier this month, involves an access to the site as is existing, which is from East Duck Lees Lane.
- 6.5.14 Each of the indicative masterplans shows the access into the adjacent site as being maintained, but as set out above, these layouts are not fixed. The access from the adjacent site to the adopted highway of East Duck Lees Lane (as indicated in paragraph 2.4) is within the red line area of this application site. It is considered that from a wider planning perspective, it is important that access to the adjacent site is ensured so as to not sterilise the regeneration of the wider area.
- 6.5.15 The applicant's TA confirms that a transport contribution will be provided towards:

- Provision of a widened pedestrian/cycle link along the western bank of the River Lea;
- Providing a link/access road connection to Jeffreys Road;
- Providing a transport contribution towards a bridge over the River Lea and improved crossing facilities across Mollison Avenue to East Duck Lees Lane.

6.5.16 As such, in transport terms the application is considered to be acceptable, as is the proposed means of access into the site as a detailed matter to be approved as part of this decision. This is predicated on the following matters being controlled via planning conditions or obligations: 15% cap on B1 floorspace; mitigations to highway network at Jeffreys Road / Mollison Avenue, East Duck Lees Lane / Mollison Avenue, Northampton Road / East Duck Lees Lane and associated changes to parking restrictions; pedestrian links from Mollison Avenue to the River Lee; financial contribution towards the delivery of a new bridge crossing over the River Lea as per the NEEAPP; cycle parking to London Plan standards; details of car parking and vehicle loading to include number of spaces, turning facilities and electric charging; requirement for stopping up order; requirement for adoption of land between highway and adjacent site or deed of dedication.

6.6 Sustainable Design and Construction

6.6.1 The NPPF advises that when determining planning applications, local planning authorities should expect new development to:

- comply with adopted Local 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; and
- take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption

6.6.2 In accordance with London Plan Policy 5.2 and DMD51 of the Development Management Document, the application includes an energy strategy for the development setting out how carbon dioxide emissions will be reduced with an overarching target to reduce carbon dioxide emission by 40% over Part L of Building Regulations 2010 across the site.

6.6.2 The Policy embeds the principles of the energy hierarchy (be lean, be clean, be green) and requires strict adherence to the hierarchy to maximise energy efficiency in development from the ground up, ensuring that the structure of the energy policies serve to incentivise considered innovative design as the core value in delivering exemplar sustainable development in accordance with the Spatial Vision for Enfield and Strategic Objective 2 of the Core Strategy. Indeed,

reflecting the overarching strategic vision for the borough, the Policy goes further than the London Plan and instils a flexibility in the decision making process to seek further efficiencies and deliver exemplar developments within our regeneration areas.

- 6.6.3 In line with draft policy DMD52, proposals for major development should contribute to the supply of decentralised energy networks and will be expected to ensure that the site is capable of future connection to a decentralised energy network, or provide a contribution towards the expansion of decentralised energy networks, or other carbon reduction measures within the borough. Details have not been submitted with the application within the Planning Statement.
- 6.6.4 The Council's Sustainable Design Officer has advised that the submitted information provided is insufficient to demonstrate compliance with the above policies and the advice provided at pre-application stage. The documents seem only to reiterate the general policy requirements without any substantive or evidenced commitments. Despite detailed pre-application advice, the application does not commit to stated measures. Whilst the Council's Sustainable Design Officer acknowledges that this is an outline application, a firm commitment to attaining the targets set is required to enable the levying of conditions to this effect and accord with the provisions of the NPPG.
- 6.6.5 In relation to the specific issues associated with this element of the application, the Council's Sustainable Design Officer has advised:
1. Energy – An energy statement has been submitted. It omits any substantive commitment and the vast majority of the document comprises acknowledgements of relevant Policies. No notional modelling has been considered, and a site wide energy strategy has not been engaged with. The requirements of DMD51, 52, 53, 54, 55 and 56 have not been addressed and ULVHN connection requirements are very light touch. The use of renewable would be essential to achieve the stated requirements (35% improvement over 2013 BR) yet this has not been engaged with particularly in light of DMD55. This is unacceptable and needs to be addressed.
 2. BREEAM – A pre-assessment features as part of the sustainability statement, but omits any substantive detail or justification. While 'Very Good' seems to have been targeted again the commitment to the rating is lost and omitted entirely from the summary section.
 3. Drainage – An FRA has been submitted. A Sustainable Drainage Strategy has been omitted despite some clear recommendations as part of the FRA. Given the 2 outline proposals, there is absolutely no reason to prevent the submission of a clear drainage strategy. This is unacceptable and critical issue to resolve given the Flood Risk afflicting the site.
 4. Green Roofs / LZC – The sustainability statement completely discounts green roof provision on the basis of technical constraints. The application is outline, by its nature detailed specification has not

been commissioned, in this regard stating that green roofs is not feasible at this stage is not possible and once again contrary to pre-app advice.

5. Living Walls – This requirement has been omitted and advice / requirements stated at pre-app have not informed the final scheme with southern elevations unnecessarily constrained. This is unacceptable and contrary to DMD39 & 55.

6. Water efficiency – Commitments omitted. This is unacceptable.

7. Biodiversity – The site is within an ecologically sensitive location. A range of recommendations feature as part of the ecological report, these have been restated in the sustainability statement, but no commitments made. Associated enhancements to the Navigation, relevant buffer zones and landscaping have been omitted. This is unacceptable.

6.6.6 In response to these concerns, the applicant has submitted a further suite of documents and these are currently being considered by the Council's Sustainable Design Officer and an update will be provided at the meeting.

6.7 Landscaping and Biodiversity

6.7.1 The Council's Arboricultural Officer has raised no objections to the application, advising that in relation to the trees on site, the better specimens appear to be retained and therefore has no objection to the few removals as long as significant tree planting enhancements are provided in the indicate landscape plan. A Tree Protection Plan will need to be conditioned to ensure the retained trees are protected during demolition and construction, and so is recommended accordingly.

6.7.2 The Council's Arboricultural Officer has raised the issue of the riverside walk and highlighted that a wider landscaped 'buffer' needs to be provided along the river boundary. This comment is noted and gives further weight to the analysis of this issue as set out above.

6.7.3 Natural England (NE) have noted that the application is in close proximity to the Chingford Reservoirs and Epping Forest Sites of Special Scientific Interest (SSSI). NE have advised that they are satisfied that the proposed development, being carried out in strict accordance with the details of the application as submitted, would not damage or destroy the interest features for which these sites have been notified. NE therefore that these SSSIs do not represent a constraint in determining this application.

6.7.4 NE have stated that this application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes, and so advise the that the Council should consider securing measures to enhance the biodiversity of the

site from the applicant, if it is minded to grant permission for this application. The Council's Biodiversity Officer has noted that as this is an outline application and no details of the final proposed footprint of the building has been confirmed at this stage. Accordingly, various conditions will be required which will be dependent on the final proposed development and the time frame of delivery. The Council's Biodiversity Officer has advised that from a biodiversity perspective Option 2 – with a more broken-up building footprint is strongly preferred – as this will allow for provision of wildlife-friendly landscaping which can therefore provide wildlife corridors throughout the site.

- 6.7.5 The Ecological report highlights the following key biodiversity issues:
- Invasive species (and the need for further surveys, eradication strategies and method statements);
 - Time-sensitive demolition and vegetation clearance (for nesting birds);
 - Water vole survey (should vegetation along River Lee Navigation be impacted by proposed development);
 - Bat foraging/commuting potential and therefore, the need for sensitive lighting schemes
 - Further bat surveys (should buildings 2, 11 and 12 be impacted in by future development and should demolition works not commence prior to April 2015).

6.7.6 The Council's Biodiversity Officer recommends nine planning conditions be attached from a biodiversity perspective, to ensure wildlife is not impacted as a result of the development and to ensure the Council fulfil their duty under the NERC Act (2006) to conserve biodiversity. The applicant has made a number of comments on the draft conditions in terms of their requirement if covered by other legislation, or whether they are required bearing in mind the majority of the onsite buildings have been demolished. In consultation with the Council's Biodiversity officer, the conditions have been amended to reflect this.

6.8 Archaeology

6.8.1 The NPPF (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 129 of the NPPF says that applicants should use information from assessment to minimise conflict with the conservation of heritage assets whilst paragraph 141 says they should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

6.8.2 English Heritage's Greater London Archaeological Advisory Service (GLAAS) has provided archaeological advice to the Council in relation to the information submitted with the application.

- 6.8.3 The site's archaeological interest lies in the potential to recover palaeo-environmental evidence preserved within peat relating to the landscape of the Lea Valley from the last Ice Age up to historic times and remains of prehistoric, Roman or early medieval settlement or structures, which could be well preserved beneath alluvium and including organic materials preserved in waterlogged conditions. Elsewhere in the Enfield section of the Lea Valley evidence of occupation and riverside structures has been found, including for example what has been interpreted as a late Roman/early Saxon 'crannog', a type of lake/wetland dwelling known from Scotland and Ireland – such sites can be considered of regional/national significance.
- 6.8.4 Following the completion of the geo-archaeological survey report and 'deposit model', English Heritage have now been supplied with some proposed foundation sections which show that the pile caps and ground beams would be constructed within modern made ground of no archaeological interest. However, piles would penetrate through the underlying deposits of archaeological interest creating an impact cumulative to that of piles which are understood to have been used for the existing buildings. English Heritage have advised that they understand that there is an intention to grub out existing foundations, which would be a concern if that involved digging below the made ground. However, as the layout of new development has not been defined the new pile layout, density and method is not yet known.
- 6.8.5 In order to fully understand and minimise the impact of development on the site's archaeological interest, English Heritage recommend that a mitigation strategy is drawn up to cover further archaeological investigation, design of foundations and control of groundworks. A condition is therefore recommended to require a two-stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by control over foundation design and further investigation. The applicant has confirmed that they are happy with this condition.

6.9 Contaminated Land and Flooding

- 6.9.1 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere (para 100). Core Policy 32 and London Plan Policy 5.21 seeks to address the risks arising from the reuse of brownfield sites to ensure its use does not result in significant harm to human health or the environment.
- 6.9.2 The site is located almost entirely within Flood Zones 2 and 3 of the River Lee. As such, a Flood Risk Assessment (FRA) has been submitted with the application and this has been assessed by the Environment Agency (EA). At this time, the EA are objecting to the application on the basis of the FRA submitted. In response to their

concerns, the applicants has submitted an updated FRA and this is currently being considered by the EA. Their view on the acceptability, or otherwise, of the updated FRA will be reported at the meeting.

6.9.2 The Council's Environmental Health officer has advised that the site is likely to have contamination and the extent needs to be established and risks to both human health and groundwater assessed. As such, they have recommended a planning condition to cover this matter, which is set out below. The EA, however, have raised an objection in relation to the application. It appears that when the EA first assessed the application, they did not have access to a document submitted by the applicant in relation to this matter, namely, the Phase 2 Geo-Environmental Assessment Report. The EA now have access to this document and their view on the acceptability, or otherwise, will be reported at the meeting.

6.10 Planning Obligations

6.10.1 Policies 8.1 and 8.2 of The London Plan (2011) seek to ensure that development proposals make adequate provision for both infrastructure and community facilities that directly relate to the development. Developers will be expected to meet the full cost of facilities required as a consequence of development and to contribute to resolving deficiencies where these would be made worse by development.

6.10.2 It is noted that the accompanying Planning Statement states a commitment by the applicant to make necessary and relevant contributions towards local infrastructure including borough services and local community facilities in accordance with London Plan policies 6.4 and 8.2 and Core Strategy policy 46 and the adopted S.106 SPD.

6.10.3 The Council has sought to achieve the provision of a riverside walk along the western banks of the Navigation to enhance pedestrian access to the employment area and to provide an amenity for those who work in the area. This has been achieved in connection with the redevelopment of a number of sites to the north and south. This application provides the opportunity to complete the link providing a continuous footpath link between Millmarsh Lane and East Duck Lees Lane, and the opportunity for a further connection to the Brimsdown site to the south. It is considered that an obligation within a Section 106 Agreement is required to ensure public access will be available and that the footpath and associated landscaping will be maintained to an agreed specification.

6.10.4 Mitigations to highway network at Jeffreys Road / Mollison Avenue, East Duck Lees Lane / Mollison Avenue, Northampton Road / East Duck Lees Lane and associated changes to parking restrictions would be secured via a Section 278 Agreement (under the Highways Act 1980) but the obligation securing the principles and the delivery

mechanism is required as an obligation within the Section 106 Agreement.

6.10.5 As set out in the report above, a key priority of the NEEAPP is the delivery of a new pedestrian bridge over the River Lee. The Council has considered the potential contributions likely to be achievable from other nearby sites as well as capital funds and other sources of grant and an appropriate contribution is thus sought from this site. It is considered that this has a direct link to the proposed development as it would help reduce the impacts of the development on the highway network by encouraging sustainable travel. The bridge would also have broader public benefits and therefore, as set out, funding from non-development sources would need to be secured. Discussions are currently ongoing with the applicant regarding the level of financial contribution to be made as part of this application.

6.10.6 It is also important to ensure that vehicle, pedestrian and cycle access to the site of No. 102 East Duck Lees Lane to the north is safeguarded so that development of this site does not sterilise the continued use of this land for employment purposes. The precise location of an access can be resolved through reserved matters submissions but no layout should prejudice such access.

6.10.7 An employment and skills strategy is required as an obligation within a Section 106 Agreement

6.10.8 It is on this basis that the proposal is considered to be acceptable, but a full update will be provided on the Heads of Terms at the meeting.

6.11 Community Infrastructure Levy

6.11.1 As of the April 2010, legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development. Since April 2012 the Mayor of London has been charging CIL in Enfield at the rate of £20 per sqm. The Council is progressing its own CIL but this is not expected to be introduced until spring / summer 2015.

6.11.2 In taking account of the structures on the site that have been demolished but, some of which, were occupied for at least six months within the last three years, a total of £ 248,028 is payable.

6.12 Other matters

6.12.1 Planning conditions are set out below that seek to cover all of the matters identified in the report above, and have been drafted on the basis that the scheme is likely to forward in multiple phases.

6.12.2 As referred to above, the applicant has commented on a number of the conditions recommended to the Council by statutory consultees, and, where appropriate, the conditions have been amended or even removed in light of these comments. It is anticipated that further such changes to the draft conditions may be required and any such changes will be reported to Members at the committee.

7. Conclusion

7.1 The regeneration of this site for an employment led development is consistent with a number of Council corporate priorities and the prevailing Development Plan policies in the London Plan, Core Strategy and emerging policy documents (such as the Development Management Document and Draft North East Enfield Area Action Plan (NEEAAP)).

7.2 As the application is in outline the actual end occupiers are not known at this time, and as such the precise number of jobs to be created is not fixed. However, given the nature of and size of the site, it is considered that the development would make a significant and meaningful contribution to the creation of new jobs, and this is a key material planning consideration to be weighed up as part of the assessment of the application.

7.3 It is recognised that a number of consultees, in particular the Council's Urban Design officer, as well as the Lee Valley Regional Park Authority and Canal and River Trust, have raised concerns with the indicative masterplans put forward by the applicant. These concerns need to be given weight because of the strategic importance of the site for setting a benchmark for high quality design, and the sensitivities of the site in terms of its relationship with the Lee Valley and adjacent Green Belt. A balance has to be struck, however, with the operational needs of the future occupiers, and bearing in mind that the application is in outline and that the Council is not approving a specific layout or design at this time, it is considered that these issues can be addressed at Reserved Matters stage. Nevertheless, the applicant will be reminded of the key issues that the Council expect them to address through the submission of the reserved matters.

7.4 Overall, it is considered that the proposed development is consistent with the requirements of the Development Plan and subject to the conditions recommended below, and the securing of a legal agreement to secure significant infrastructure benefits for the local area, is acceptable.

8. Recommendation

8.1 That subject to the completion of a S106 Agreement to secure the obligations as set out in the report, the Head of Development Management / the Planning Decisions Manager be authorised to

GRANT planning permission subject to conditions to address the following.

1. The development shall be begun not later than three years from the date of this permission or two years from the final approval of the first Reserved Matters application, whichever is the later.
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).
2. This permission shall lapse unless the first Reserved Matters application is made within two years of the date of this permission.
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).
3. Approval of the details shown below (the Reserved Matters) for each phase of development shall be obtained from the local planning authority in writing before any development in that phase is commenced:
 - a) layout
 - b) scale
 - c) appearance
 - d) landscapingThe application for the approval of the scale and appearance of the buildings shall include a Landscape and Visual Impact Assessment (LVIA) so as to address the potential visual impact of the new buildings.
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).
4. The maximum total floorspace of the buildings that are constructed pursuant to this planning permission shall not exceed 31,552 sqm, of which a maximum of 15% of the Gross Internal Area of such shall be used as Class B1 offices.
Reason: in the interests of highway safety.
5. Each phase of the development shall not commence until details of parking and turning facilities to be provided in that phase in accordance with the standards adopted by the Local Planning Authority have been submitted to and approved in writing by the Local Planning Authority. The details shall include provision for disabled parking bays (minimum 10%) and electric charging points (minimum 20% with a further 10% passive provision). The facilities shall be constructed in accordance with the approved details before the development is occupied and shall be maintained for this purpose.
Reason: To ensure that the development complies with Unitary Development Plan Policies and does not prejudice conditions of safety or traffic flow on adjoining highways.
6. Each phase of the development shall not commence until details of the siting and design of secure covered cycle parking facilities for that phase in accordance with the standards adopted by the Local Planning

Authority have been submitted to and approved in writing by the Local Planning Authority. The cycle parking facilities shall be provided in accordance with the approved details prior to occupation of any part of the development and thereafter permanently maintained for cycle parking.

Reason: To ensure the provision of cycle parking spaces in line with the Council's adopted standards.

- 7 The site shall be enclosed in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The means of enclosure shall be erected in accordance with the approved detail before the development is occupied.

Reason: To ensure satisfactory appearance and safeguard the privacy, amenity and safety of adjoining occupiers and the public and in the interests of highway safety.

- 8 Each phase of the development shall not commence until details of refuse storage facilities including facilities for the recycling of waste to be provided within the development, in accordance with the London Borough of Enfield Waste and Recycling Planning Storage Guidance ENV 08/162, have been submitted to and approved in writing by the Local Planning Authority. The facilities shall be provided in accordance with the approved details before the development is occupied or use commences.

Reason: In the interests of amenity and the recycling of waste materials in support of the Boroughs waste reduction targets.

9. No plant, machinery, goods, products or waste material shall be deposited or stored on any open part of the site unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of amenity and the appearance of the site.

10. A) Prior to the submission of reserved matters for any part of the development, the applicant (or their heirs and successors in title) shall secure the implementation of a programme of archaeological evaluation for that part in accordance with a written scheme which has been submitted by the applicant and approved by the local planning authority in writing and submit a report on the evaluation to the local planning authority.

B) If heritage assets of archaeological interest are identified by the evaluation under Part A, then development shall not take place until details of the foundation design have been submitted by the applicant and approved in writing by the planning authority and the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological investigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.

C) No development or demolition below existing ground level (other than removal of the concrete slab) shall take place other than in

accordance with the foundation design and Written Scheme of Investigation approved under Part (B).

D) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (B), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF.

11. Each phase of the development shall not commence until a report detailing both temporary and permanent lighting schemes and how they will not adversely impact upon wildlife has been submitted to and approved in writing by the LPA. The report shall include the following figures and appendices:

- A layout plan with beam orientation;
- Measures to avoid glare on to features of suitable bat foraging/commuting habitat (hedges, tree lines and watercourses as indicated in Middlemarch Environmental Ltd's Phase 1 Habitat Assessment) and suitable otter commuting habitat (in particular the River Lee Navigation);
- Measures to ensure that lighting (both temporary and permanent) along the southern and eastern boundaries of the site will be kept to a minimum and directed away from the river to maintain 'dark' corridors;
- An isolux contour map showing light spillage to 1 lux both vertically and horizontally in areas identified as being of importance for commuting and foraging bats (as highlighted in Middlemarch Environmental Ltd's Phase 1 Habitat Assessment and Bat Survey Report).

The approved lighting plan shall thereafter be implemented as agreed.

Reason: To ensure that wildlife is not adversely affected by the proposed development in line with CP36 of the Core Strategy.

12. No development shall commence of each individual phase until details of sustainable drainage systems (SuDS) to dispose of surface water run-off, incorporated into a landscaping SuDS scheme have been submitted and approved in writing by the council. The SuDS landscaping scheme shall include:

- Features of natural habitat to include if practicable; green roof(s), rain gardens and permeable paving;
- Written specifications (including cultivation and other operations associated with plant establishment);
- Schedules of plants and seeds to be incorporated which include native, wildlife-friendly species;
- A continuing management and maintenance plan to ensure its continued function over the lifetime of the development.

The Sustainable Drainage System shall be installed prior to the first occupation alongside the installation of the landscaping scheme and shall be carried out strictly in accordance with the details so approved and maintained as such thereafter.

Reason: To ensure that flood risk, biodiversity and adaptation to climate change have been addressed by the new development in line with the Core Strategy (Core Policy 28 & 36), the London Plan (Policies 2.18; 5.11; 5.12 & 5.13) and NPPF.

13. Prior to the commencement of the development hereby permitted, a Risk Assessment and Method Statement outlining all works to be carried out adjacent to the water must be submitted and approved in writing by the local planning authority in consultation the Canal & River Trust.

Reason: In the interest of navigational safety

14. Prior to the commencement of any development adjacent to the boundary with the River Lee, a survey of the condition of the waterway wall, and a method statement and schedule of the repairs identified shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Canal & River Trust. The repair works identified shall be carried out in accordance with the method statement and repairs schedule by a date to be agreed in the repairs schedule.

Reason: In the interest of the structural integrity of the waterway wall, waterway heritage, navigational safety and visual amenity.

15. No development shall take place until Construction Management Plan, written in accordance with the 'London Best Practice Guidance: The control of dust and emissions from construction and demolition' detailing how dust and emissions will be managed during demolition and construction work shall be submitted to the local planning authority for approval. Once approved the Construction Management Plan shall be fully implemented for the duration of any demolition and construction works.

Reason: To avoid risk to public health and the environment.

16. No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure.

17. The development shall not commence until a scheme to deal with the contamination of the site including an investigation and assessment of the extent of contamination and the measure to be taken to avoid risk to health and the environment has been submitted to and approved in writing by the Local Planning Authority. Remediation shall be carried out in accordance with the approved scheme and the Local Planning Authority provided with a written warranty by the appointed specialist to confirm implementation prior to the commencement of development.
Reason: To avoid risk to public health and the environment
18. No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned in any manner, be it branches, stems or roots, other than in accordance with the approved plans and particulars, without the prior written approval of the Local Planning Authority. All tree works shall be carried out in accordance with BS 3998. If any retained tree is cut down, uprooted, destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.
Reason: To screen, preserve and enhance the development and ensure adequate landscape treatment in the interest of amenity, and to ensure that the retained trees, shrubs and hedgerows on the site or in adjacent sites are not adversely affected by any aspect of the development.
19. No works or development shall take place until a scheme for the protection of the retained trees (BS 5837, the Tree Protection Plan) has been agreed in writing with the Local Planning Authority. This scheme shall include:
 - A: a plan to a scale and level of accuracy appropriate to the proposal that shows the position, crown spread and Root Protection Area (BS 5837) of every retained tree on site and on neighbouring or nearby property to the site in relation to the approved plans and particulars. The positions of all trees to be removed shall be indicated on this plan.
 - B: the details of each retained tree as required in accordance with BS 5837 in a separate schedule.
 - C: a schedule of tree works for all the retained trees in paragraphs (a) and (b) above, specifying pruning and other remedial or preventative work, whether for physiological, hazard abatement, aesthetic or operational reasons. All tree works shall be carried out in accordance with BS 3998.
 - D: written proof of the credentials of the arboricultural contractor authorised to carry out the scheduled tree works.
 - E: the details and positions (shown on the plan at paragraph (a) above) of the Ground Protection Zones (BS 5837).
 - F: the details and positions (shown on the plan at paragraph (a) above) of the Tree Protection Barriers (BS 5837), identified separately where required for different phases of construction work (e.g. demolition, construction, hard landscaping). The Tree Protection Barriers must be erected prior to each construction phase commencing and remain in

place, and undamaged for the duration of that phase. No works shall take place on the next phase until the Tree Protection Barriers are repositioned for that phase.

G: the details and positions (shown on the plan at paragraph (a) above) of the Construction Exclusion Zones (BS 5837).

H: the details and positions (shown on the plan at paragraph (a) above) of the underground service runs (BS 5837).

I: the details of any changes in levels or the position of any proposed excavations within 5 metres of any Root Protection Area (BS 5837) of any retained tree, including those on neighbouring or nearby ground.

J: the details of any special engineering required to accommodate the protection of retained trees (BS 5837), (e.g. in connection with foundations, bridging, water features, surfacing)

K: the details of the working methods to be employed with the demolition of buildings, structures and surfacing within or adjacent to the Root Protection Areas of retained trees.

L: the details of the working methods to be employed for the installation of drives and paths within the Root Protection Area's of retained trees in accordance with the principles of "No-Dig" construction.

M: the details of the working methods to be employed with regard to the access for and use of heavy, large, difficult to manoeuvre plant (including cranes and their loads, dredging machinery, concrete pumps, piling rigs, etc) on site.

N: the details of the working methods to be employed with regard to site logistics and storage, including an allowance for slopes, water courses and enclosures, with particular regard to ground compaction and phytotoxicity.

O: the details of the method to be employed for the stationing, use and removal of site cabins within any Root Protection Areas (BS 5837).

P: the details of tree protection measures for the hard landscaping phase (BS 5837).

Q: the timing of the various phases of the works or development in the context of the tree protection measures.

Reason: To screen, preserve and enhance the development and ensure adequate landscape treatment in the interest of amenity, and to ensure that the retained trees, shrubs and hedgerows on the site or in adjacent sites are not adversely affected by any aspect of the development.

20. The following activities must not be carried out under any circumstances:

A: No fires shall be lit within 10 metres of the nearest point of the canopy of any retained tree.

B: No works shall proceed until the appropriate Tree Protection Barriers are in place, with the exception of initial tree works.

C: No equipment, signage, fencing, tree protection barriers, materials, components, vehicles or structures shall be attached to or supported by a retained tree.

D: No mixing of cement or use of other materials or substances shall take place within Root Protection Areas, or close enough to a Root

Protection Area that seepage or displacement of those materials or substances could cause them to enter a Root Protection Area

E: No alterations or variations to the approved works or tree protection schemes shall be carried out without the prior written approval of the Local Planning Authority.

Reason: To screen, preserve and enhance the development and ensure adequate landscape treatment in the interest of amenity, and to ensure that the retained trees, shrubs and hedgerows on the site or in adjacent sites are not adversely affected by any aspect of the development.

21. No works or development shall take place until a scheme of supervision for the arboricultural protection measures has been approved in writing by the Local Planning Authority. The scheme will be administered by an Arboriculturalist (as defined in BS 5837). Furthermore the scheme will be appropriate to the scale and duration of the works and include the following details:

A: induction and personnel awareness of arboricultural matters.

B: identification of individual responsibilities and key personnel.

C: statement of delegated powers.

D: timing and methods of site visiting and record keeping, including updates.

E: procedures for reporting and dealing with variations and incidents.

Reason: To screen, preserve and enhance the development and ensure adequate landscape treatment in the interest of amenity, and to ensure that the retained trees, shrubs and hedgerows on the site or in adjacent sites are not adversely affected by any aspect of the development.

22. Before development is commenced, a feasibility study shall be carried out to assess the potential for moving freight by water during the construction cycle (waste and bulk materials). The use of waterborne transport shall be maximised during the construction of the development unless the above assessment demonstrates that such use of the waterway is not physically or economically feasible.

Reason: To encourage the use of the waterways for transporting waste and bulk materials.

23. Each phase of the development shall not commence until a Japanese Knotweed survey has been completed and an eradication strategy has been submitted to, and approved in writing by the council. The strategy shall include details of and timescales for knotweed eradication and if the knotweed has not been eradicated at the time of commencement of works, details of the measures to be put in place to ensure that works do not cause its spread.

The eradication strategy shall be carried out in accordance with the approved details.

Reason: To ensure that wildlife is not adversely affected by the proposed development in line with CP36 of the Core Strategy

(Japanese knotweed, is an invasive weed that can have a significant adverse effect on biodiversity).

24. Each phase of the development shall not commence until a Himalayan balsam and Buddleia removal method statement has been submitted to, and approved in writing by the council. The method statement shall include details of how both species will be removed in a sensitive manor to ensure that the proposed works do not result in the spread of any non-native invasive species.
The method statement shall be carried out in accordance with the approved details.
Reason: To ensure that biodiversity is not adversely affected by the proposed development in line with CP36 of the Core Strategy (Both Himalayan Balsam and Buddleia are an invasive non-native species that can have an adverse effect on biodiversity).
25. All areas of hedges, scrub or similar vegetation where birds may nest which are to be removed as part of the development, are to be cleared outside the bird-nesting season (March - August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably qualified ecologist will check the areas to be removed immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded, no vegetation clearance or other works that may disturb active nests shall proceed until all young have fledged the nest.
Reason: To ensure that wildlife is not adversely impacted by the proposed development in accordance with national wildlife legislation and in line with CP36 of the Core Strategy. Nesting birds are protected under the Wildlife and Countryside Act, 1981 (as amended).
26. Prior to commencement of works, all areas of marginal vegetation along the River Lee Navigation which are to be impacted by the proposed development are to be inspected for water voles by a suitably qualified ecologist and a brief report detailing the methodology, findings (presence/absence) and follow up strategy (if necessary) is to be submitted and approved in writing by the Council.
Reason: To ensure that Water Voles (a European Protected Species) are not impacted by the proposed development.
27. Should development not commence prior to April 2015, further internal bat surveys of any trees to be impacted by future development works will need to be undertaken (by an appropriately qualified ecologist) and the results submitted and approved in writing by the Council. Should bats or evidence of bats be found no development is to commence until the relevant licence(s) have been obtained from the Statutory Nature Conservation Organisation (Natural England).
Reason: To ensure that bats, a European Protected Species and a material consideration, are not adversely impacted upon by the development.

28. A cycle/pedestrian route a minimum of 3m in width shall be provided through the site, linking Mollison Avenue with the River Lea Navigation. Details of the alignment of the route, lighting and surface treatment shall be submitted as part of the first reserved matters submission pursuant to condition 3. The cycle/pedestrian route shall be constructed in accordance with the approved details and available for public use before the occupation of any part of the development. The cycle/pedestrian route shall thereafter be maintained and shall not otherwise be enclosed or obstructed except for purposes of maintenance.

Reason: To ensure that pedestrian and cycle access from Mollison Avenue to the Lee River is attractive to use so as to encourage more sustainable modes of transport.

DIRECTIVES:

1. Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping shall be accompanied by an urban design report which explains the approach to the design and how it addresses the following matters (applicability dependent upon location):

- The provision for a landscaped walk of a minimum width of 8m from any new buildings to the Navigation;
- Suitable interaction with Mollison Avenue in terms of the positioning and size of the buildings in this location and the provision for sufficient landscaping to create a positive street environment.
- Ensure that active building frontages overlook the waterways and streets and spaces within the development.
- Improved pedestrian and cycle links through the site from Mollison Avenue to the Lee River; the links must be well lit, open and overlooked and at least 3m in width in order to provide a safe and attractive environment.
- Create views through the development to the water and to the reservoir embankments beyond.

Reason: in the interests of securing high quality development the response to local context and improves the wider character of the area.

2. Soft landscaping details submitted under condition 3 shall include:

- Planting plans;
- Written specifications (including cultivation and other operations associated with plant and grass establishment);
- Schedules of plants and trees, to include native and wildlife friendly species and large canopy trees in appropriate locations (noting species, planting sizes and proposed numbers/densities), following habitat recommendations within section 6.2 of Middlemarch Environmental Ltd's Phase 1 Ecological Assessment;
- Implementation timetables;
- Biodiversity enhancements to include 10 bird and 10 bat bricks/tiles/tubes which are to be designed and built into the new

buildings (targeting species such as house sparrow) in appropriate locations with guidance from a suitably qualified ecologist following recommendations within section 6.2 of Middlemarch Environmental Ltd's Phase 1 Ecological Assessment;

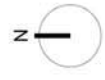
- Specifications for fencing demonstrating how hedgehogs and other wildlife will be able to continue to travel across the site (10cm² gaps in appropriate places at the bottom of the fences).

Reason: To ensure that the ecological value of the site is maintained, protected and enhanced post development in line with the Biodiversity Action Plan, CP36 of the Core Strategy, the London Plan and Paragraph 118 of the NPPF.

3. In relation to condition 11, the Council would expect any new lighting to not adversely impact upon wildlife and therefore details of this should be included with the submission for this.

4. In relation to condition 18, a "retained tree" is an existing tree which is to be retained in accordance with the approved plans and particulars and any recommendations therein; and paragraphs (a) and (b) shall have effect until the expiration of 5 years from the date of the (occupation of the building/commencement of use of the approved development) for its permitted use.

- Dimensions are in millimeters, unless stated otherwise.
 - All dimensions are to the centerline of the element.
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By: [Signature]
 Enfield Distribution Park
 Illustrative Masterplan 02

SCOTTISH WIDOWS INVESTMENT PARTNERSHIP
 PERFORM

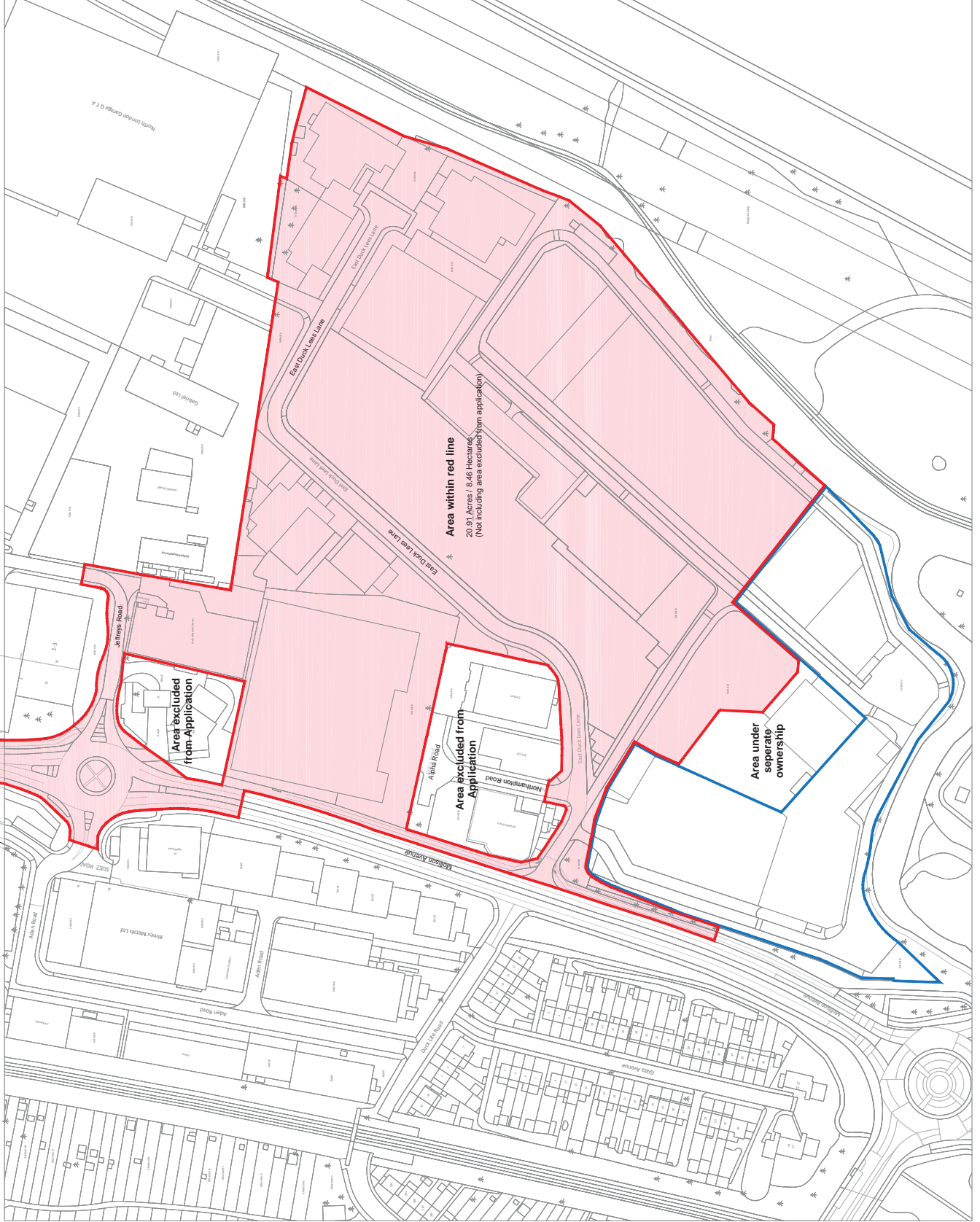
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Drawing Status: Preliminary
 Drawn: ERM
 Date: 12/02/2014
 Scale: 1:1000 G41
 Drawing no: 13020_P003
 Revision: D



Dimensions in millimeters unless stated otherwise.
 It is the responsibility of the user to ensure that the correct scale is used.
 All relevant drawings and specifications should be read in conjunction with this drawing.



revisions by date
Enfield Distribution Park
 Red Line Application Boundary



Project Name: Enfield Distribution Park, Colindale Ave, North, North London HA23 7TH
 Drawing No: 130220
 Date: 2011/12/13
 Scale: 1:1000 @ A1
 Drawing no: 130220
 Revision: G



05 | Design & Access

Illustrative Aerial Photomontage - based on Illustrative Masterplan 01



05 | Design & Access

Illustrative Eye Level Perspective - based on Illustrative Masterplan 01

