

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 12th March 2015

Report of
Assistant Director, Planning &
Environmental Protection

Contact Officer:
Andy Higham Tel: 020 8379 3848
Sharon Davidson Tel: 020 8379
3857
Mr R. Singleton Tel: 020 8379 3837

Ward: Highlands

Application Number : 14/04574/OUT

Category: Major Large Scale –
Dwellings

LOCATION: CHASE FARM HOSPITAL, THE RIDGEWAY, ENFIELD, EN2 6JL

PROPOSAL: Redevelopment of site for mixed use to provide up to 32,000sq m of replacement hospital facilities, construction of a 3-form entry primary school including temporary facilities pending completion of permanent school and construction of up to 500 residential units, provision of additional hospital access opposite Ridge Crest and provision of access to the school site via Shooters Road, involving demolition of hospital buildings and associated residential blocks, partial demolition of Clock Tower complex, removal of microwave clinical waste treatment plant and fuel oil burner, retention of Highlands Wing, retention and extension of existing multi-storey car park, provision of associated car parking, cycle parking, plant, hard and soft landscaping, public realm improvements and associated works. (Outline application: Access)

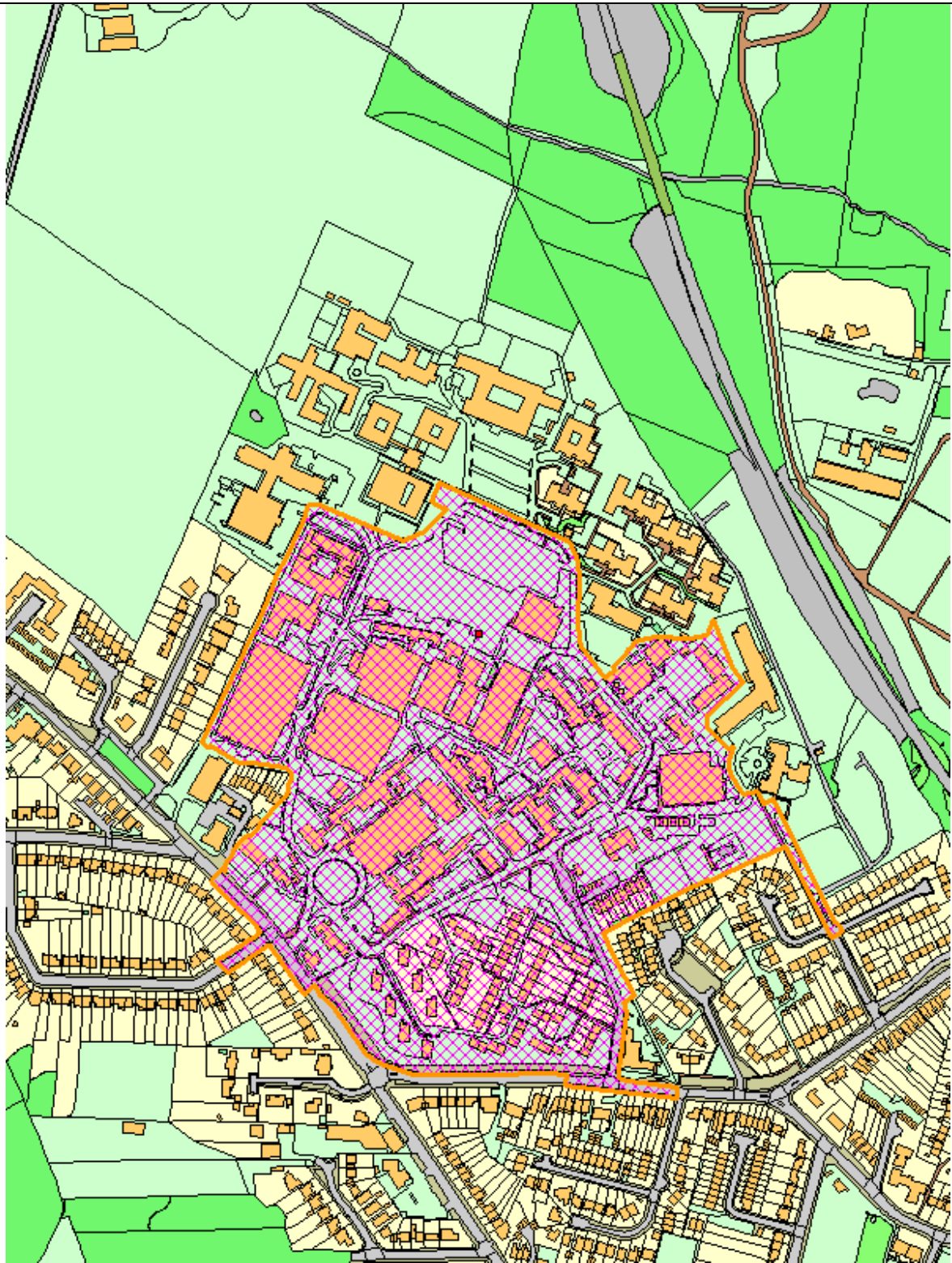
Applicant Name & Address:
Royal Free London NHS Foundation Trust
C/O Agent

Agent Name & Address:
Mr Paul Burley
Montagu Evans
Montagu Evans LLP
5 Bolton Street
W1J 8BA
United Kingdom

RECOMMENDATION:

That, subject to referral to the Great London Authority, and the completion of a S106 Agreement, the Head of Development Management/ Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions.

Ref: 14/04574/OUT LOCATION: Chase Farm Hospital, The Ridgeway, EN2 8JL,



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Scale 1:5000

North



1. Site and Surroundings

- 1.1 The subject site comprises Chase Farm Hospital complex, a 14.9 hectare plot of land with principal health care usage with ancillary staff / residential accommodation laying to the south of the site. The main hospital is located to the north and is contained within a series of 3-4 storey healthcare blocks, ad-hoc temporary structures, single storey buildings and a multi-storey car park. In this regard, the area is mixed in terms of character, a legacy of historic hospital expansion that radiates out from the original (and heavily extended) Victorian core.
- 1.2 A number of adopted routes penetrate the site with principle access to both the hospital and Mental Health Trust facilities spread between Hunters Way to the south and The Ridgeway to the west. The site is bounded by The Ridgeway to the west and Lavender Hill to the south. Both are classified roads. To the north-west and south-east, predominately residential properties line a series of cul-de-sacs namely Spring Court Road and Albuhera Close / Shooters Road respectively. The retained Mental Health Trust land and secure unit lays to the north-east of the site.
- 1.3 Over-spill car parking facilities permeate the site and the hospital provides the terminus for a series of bus routes including the W8 and 313. Gordon Hill mainline train station lies to the east of the site and a number of surrounding residential roads are subject to Controlled Parking. Overall, the site has a Public Transport Accessibility Level of 2
- 1.4 The site is adjacent to designated Green Belt to the north and east of the site.
- 1.5 The site is not within a Conservation Area and does not form part of the curtilage of a Listed Building, albeit the Victorian Clock Tower complex is considered to be a non-designated heritage asset.
- 1.6 A number of established and vintage trees pepper the site throughout and the area is known to have bat activity and established bat roosts.
- 1.7 The site is subject to an area Tree Preservation Order.
- 1.8 The site is not within a flood zone, but is at risk of surface water flooding.

2. Proposal

- 2.1 This is an outline application for the redevelopment of site for mixed use to provide up to 32,000sq m of replacement hospital facilities, construction of a 3-form entry primary school, including temporary facilities pending completion of the permanent school, and construction of up to 500 residential units, the provision of a repositioned hospital access opposite Ridge Crest and provision of access to the school site via Hunters Way, involving demolition of hospital buildings and associated residential blocks, partial demolition of the Clock Tower complex, removal of microwave clinical waste treatment plant and fuel oil burner, retention of Highlands Wing, retention and extension of existing multi-storey car park, provision of associated car parking, cycle parking, plant, hard and soft landscaping, public realm improvements and associated works.

2.2 The application is in outline form with all matters, except access, reserved.. However, an illustrative layout has been submitted demonstrating what form the development may take on site. In addition the application is supported by a variety of documents in particular a Planning Statement, Design and Access Statement, Visualisation Study, Indicative Masterplan with Relevant Parameter Layers, and Framework Design Code that confirm in greater detail the form and mix of the development proposed.

2.3 The applicant's Planning Statement and other supporting documents confirms that in terms of detail the application proposes:

- The demolition of approximately 36,833 sq.m (GIA) of existing healthcare floorspace.
- The demolition of 7,877 sq.m (GIA) of residential floorspace
- The retention and refurbishment of the Highlands wing for continued hospital use.
- The retention and refurbishment of the central Clock Tower for residential use.
- The retention and extension of the existing multi-storey car park to the north of the site to provide parking for up to 900 cars servicing the hospital.
- The construction of up to 32,000 sq.m (GIA) of healthcare floorspace with a total resultant area (including Highlands Wing) of 36,723 sq.m (GIA) of health care floor space with a further 8000 sq.m earmarked for future expansion and an additional land around the hospital complex for a net uplift of 70% safeguarded for future expansion.
- The construction of up to 45,435 sq.m (GIA) of residential floor area to provide up to 500 residential units with an indicative accommodation mix of 2, 3 & 4-bed houses (62% of total) and 1, 2 & 3-bed apartments (38% of total) and including the provision of approximately 1 parking space per property.
- Construction of 3,600 sq.m (GIA) of educational floor space to provide a 3 form entry primary school with approximately 35 car parking spaces and a 1000 sq.m Multi Use Games Area (MUGA).
- Construction of a 630 sq.m (GIA) temporary school.
- The relocation and formation of a new vehicle and pedestrian access to the site from The Ridgeway adjacent to Ridge Crest.
- The provision of a new pedestrian crossing to Lavender Hill
- The retention of vehicular access points to Hunters Way and Shooters Road.
- The introduction of new public open space, public realm and private amenity space.
- The removal of a microwave clinical waste treatment plant and the provision of a centralised energy centre to provide future potential to create a localised heat network connecting each of the stated uses across the site.

2.4 In addition, following on from the comments made at the Planning Panel on 7th January 2015, and issues raised by statutory consultees, revisions have been made to the scheme and additional information submitted to address relevant concerns. For clarity these include:

- Removal of permanent car parking from Green Belt land adjacent to Shooters Road.

- Provision of up to 800 sq.m of floor area reserved within the hospital site for primary healthcare uses.
- Re-routing of interim and permanent school access via Hunters Way with one way exit via Shooters Road including provision of new connecting road and control measures.
- Amended Planning Statement (09/02/15)
- Amended Healthcare Management Plan (09/02/15)
- Infrastructure Strategy (09/02/15)
- Royal Free Response to Statutory Consultees Comments (09/02/15)
- Transport Assessment Response to LBE (09/02/15)
- Transport Assessment Response to Public Consultation (09/02/15)
- Summary of Six-Facet Survey (09/02/15)
- Schedule of Chase Farm Building Areas (09/02/15)
- Redacted Financial Viability Appraisal (08/01/15)
- Healthy Urban Development Unit Rapid Health Impact Assessment Matrix (09/02/15)
- Townscape, Landscape and Visual Impact Assessment (Parts 1-5) (09/02/15)
- Framework Design Code

2.5 The indicative Masterplan, has been designed to incorporate relevant Local Plan standards and the indicative scale and massing layer show development with varying heights across the site. Residential houses are indicated as being between 2-3 storeys with apartment blocks ranging between 3-5 storeys depending on their location. The development reaches critical mass towards the centre of the site and adjacent to the hospital, where through pre-application discussions it was considered that the site could accommodate an increase in overall scale. Development to Lavender Hill and the Ridgeway possess a far more modest and human scale positively responding to the suburban residential pattern of development indicative of the surrounding area. The permanent school would reach a maximum of 3 storeys, with the temporary school built over a maximum of 2 storeys. Due to the topography of the site, the main hospital building will reach a maximum of 5 storeys in height.

2.6 Whilst not part of the subject application, members are advised that, in parcelling the land, the Trust has allowed for potential future expansion / net uplift of floor area to the order of around 70%. Moreover, the more formalised two grey areas are also identified on the plan as likely areas for future expansion. As a guide these areas alone would allow for around 8,000 sq.m of expansion potential for the site. The Trust have further indicated that they are comfortable for a condition to be levied limiting the potential use of the identified hospital site.

3. Relevant Planning Decisions

3.1 The site has an extensive planning history, however, the most applicable in the determination of the subject application are as follows.

3.2 TP/06/1687 – Demolition of an existing building and erection of 24 residential dwellings (comprising a 3-storey block of 12 x 2 bed flats; 9 x 3-storey terraced townhouses of 5 x 3 bed and 4 x 4 bed; and 3 x 2-storey detached block of 2 bed units over garages) together with car parking, bicycle stores

and visitor parking with access via The Ridgeway – Approved subject to conditions (28/12/06)

- 3.3 TP/06/1682 – Demolition of existing garages and construction of 14 x 2 bed residential dwellings (comprising 3 storey block of 12 flats and two 2-storey block of units above garages) together with provision of 18 car parking spaces, cycle stores and 3 visitor parking with access via Hunters Way – Approved subject to conditions (28/12/06)
- 3.4 TP/06/0789 – Redevelopment of site B for residential purposes for the erection of a total of 279 units consisting of 164 residential units (comprising 87 two bed flats, 46 three bed houses, 31 four bed houses) and 115 affordable units (comprising 24 one bed keyworker flats, 65 two bed keyworkers flats, and 26 three bed keyworker flats) with associated parking and highway improvement works at junction of Hunters Way and Lavender Hill (Outline Application – siting and means of access only) – Refused (30/11/06) by reason of:
1. The application site comprises part of a large area of land occupied by Chase Farm Hospital. In the absence of a comprehensive strategy in respect of the future development and land requirements of the hospital there is insufficient certainty to establish the overall impact of future development of the hospital site as a whole on the area having regard to Policy (II)GD10 of the Unitary Development Plan and the principles set out in PPS1 - Delivering Sustainable Development.
 2. The proposed key worker housing layout includes blocks of flats which would be of excessive height and scale having regard to the character of the area and their siting in relation to adjoining residential properties. The proposal would not have appropriate regard to its surroundings and detract from the amenities of adjoining occupiers contrary to Policies (I)GD1, (I)GD2 and (II)GD3 of the Unitary Development Plan.
 3. An excessive density of development is proposed in the key worker housing layout having regard to the character and form of surrounding development and Policy (II)H7 of the Unitary Development and Policy 4B.3 of The London Plan.
- 3.5 The application was occasioned at Appeal and was dismissed. In the assessment of the subject application, the determination of the Local Planning Authority under previous iterations for the redevelopment of the site are a material consideration in the determination of the subject application, notably with regard to the deliverability of a workable scheme, scale, height and density.
- 3.6 In addition, Members are advised that a further application has been submitted under ref: 15/00769/RE4 for the erection of a single storey 4-class modular building with hard surfaced play areas to provide temporary primary school for one form of entry pending provision of a permanent primary school, involving construction of associated car park and Hunters Road link and new pedestrian footway. This application is currently being considered and consultation letters have recently been issued. The application has been submitted due to the challenging funding timescales set by government for

the release of funds for the main primary school attached to the Chase Farm site and affords a far greater flexibility to accelerate the build process should committee resolve to grant consent.

- 3.7 The application formalises and provides additional detail on the design, access and servicing requirements for the interim school and includes within the redline boundary, some of the mental health land directly to the north of the site – and outside of the Green Belt – for the formation of a car park designed to service both the interim and permanent school sites . The potential intake of the interim school remains unchanged and consent is sought on a temporary basis.

4. Consultations

4.1 Statutory and non-statutory consultees

Greater London Authority:

- 4.1.1 The subject application is referable to the Mayor. A Stage 1 response to the application was issued 13th January 2015 and the following comments were made

Principle of Development:

- Having regard to Policies 3.3, 3.17 and 3.18, the proposal to deliver improved social infrastructure (enhanced hospital facilities and a new primary school) enabled in part by residential development is strongly supported.

Green Belt:

- Justification for the provision of temporary school cited on the basis of available evidence of local demand for primary school places, the absence of viable alternative sites coupled with a necessity to deliver an additional primary school form by September 2015 is such that the Greater London Authority would concede that these factors form the very special circumstances to legitimise the temporary use of the site for the interim school building.
- However, officers were not satisfied that such a burden of proof had been met in relation to the permanent car park proposed for the site once the temporary school had been removed, stating that justification cited on the basis of a need of car parking to support the function of the future three-form entry primary school was insufficient to justify the loss of the Green Belt. The GLA sought to encourage the applicant to find a means by which any parking demand could be decanted to the main school site which falls outside of the Green Belt boundary.

Healthcare Facilities:

- The current hospital building at the site provides 41,556 sq.m of floorspace. Whilst the GLA acknowledge that the current configuration and dispersal of this floorspace leads to a number of inefficiencies in terms of the way it collectively contributes to the operational requirements of the hospital, it notes that the development would result in the net loss of

healthcare floorspace of 4,833 sq.m and in this regard points out that the development does not strictly comply with Policy 3.16 of the London Plan.

- On this basis, the GLA have invited further discussions and supplementary material to justify the development and how the proposal fits within the objectives of the wider Barnet Enfield Haringey Clinical Strategy and what potential there is at the site for hospital expansion in the future.
- The GLA also have recommended that the Local Planning Authority (LPA) secure a phasing strategy to ensure a continuity of service.

Education Facilities:

- Notwithstanding issues relating to the location of the car park, the GLA strongly support the provision of a new three-form entry primary school to the permanent site and as has been outlined previously would accept the very special circumstances stated to legitimise the interim school.
- While it is understood that the 1.87 hectare plot of land for the permanent school is to be transferred to the Education Authority, GLA Officers have sought clarification on how the scheme intends to contribute towards mitigating for the impact of the proportion of educational demand that is directly attributable to the proposed development itself.
- The GLA have also sought to encourage the multiple use of school facilities for the community and / or recreational use outside of operational hours. This could be secured through a Community Use Plan (as secured by condition / obligation).
- Given the phasing of the development across the site and specifically the school, the GLA would expect any necessary and appropriate construction impact mitigation measures to be secured to ensure that a high quality learning environment is maintained at all times.

Housing:

- There are 286 existing dwellings on the site, all of which are scheduled for demolition as a result of this application. In the absence of any associated legal covenant, the dwellings do not meet the current definition of 'key worker housing'. GLA Officers understand that the letting of these units has not been solely restricted to hospital staff, and that the dwellings that are currently occupied are being rented on an assured short hold basis.

Reprovision of Housing

- Policy 3.14 of the London Plan resists the loss of housing, including affordable housing. The development seeks to provide up to 500 new homes, resulting in an uplift of up to 214 units for the site (depending on resultant mix – 196 when taking account of indicative mix submitted and the creation of 482 units). The proposed uplift in the number of units for the site is strongly supported. However, in the absence of a finalised affordable housing offer, it is not currently possible to provide a complete assessment of the scheme against London Plan targets. Nevertheless, in accordance with Policy 3.14, the GLA strongly encourage the applicants to prioritise the provision of key worker housing as part of the affordable provision.

Affordable Housing

- The GLA acknowledge that a significant amount of public funding has been allocated for the proposed redevelopment of Chase Farm and that the residential and school development is required to bridge an overall funding gap. The GLA further understand that – in conjunction with public funding – there is the potential for the scheme to generate a financial surplus beyond that strictly required to enable the hospital development. In this regard, while prioritising the delivery of key worker accommodation the GLA, through ongoing discussions, would seek to secure the maximum reasonable amount of affordable housing.

Balance of Tenure and Mix of Units

- The illustrative mix indicates that the scheme is capable of achieving an excellent range of unit typologies and dwelling sizes to accord with Policy 3.8 of the London Plan. The illustrative mix would achieve a 57% provision of family-sized housing, which the GLA strongly supports. Nevertheless, the applicant is advised to be mindful of the priority accorded to family sized affordable housing when finalising the affordable housing offer.

Density and Residential Quality

- The development would achieve 62 units per hectare. This sits comfortably within the range identified by Table 3.2 of the London Plan.
- The detailed design of the dwellings will need to be addressed as a reserved matter, however, it is evident from the illustrative plans and typologies that the development would allow for the minimum residential space standards within Policy 3.5 of the London Plan to be met or exceeded. This is supported and the applicant is advised to incorporate these minimum standards (along with the Mayor's Housing SPG best practice residential design principles) within a design guide for the detailed phases

Children's Play Space

- In accordance with the Mayor's Play and Informal Recreation SPG, the GLA have calculated an expected child population of 190 for the development on the basis of the indicative mix. Accordingly, the development would need to make provision for a minimum of 1,900 sq.m of children's play and informal recreation space.
- Having reviewed the submission, the GLA note that the scheme is capable of providing 2,000 sq.m of open space for this purpose and thus is supported in terms of absolute provision. In reflecting the outline nature of the application, it is recommended that the design guide incorporates the core design principles for these spaces as stated in the SPG.

Urban Design:

- Overall, the proposed masterplan is broadly supported. The layout would appear to work well to rationalise the site in relation to its context by providing a compact hospital campus to the northwest, and a new suburban residential neighbourhood to the southeast. The simple

perimeter block and terrace house typologies help to create clearly identifiable street frontages, whilst appropriately defining amenity spaces.

Historic Environment

- GLA Officers concur with the Council in their identification of the Clock Tower complex as a non-designated heritage asset and assert that that building is of significant merit in townscape terms.
- In line with the principles of London Plan Policy 7.9, the applicant has sought to incorporate the non-designated asset within the Masterplan. When considering this the applicant has tested a number of scenarios associated with varying degrees of original fabric retention. Having considered this assessment, and mindful of the need to maximise the value of the residential land to cross-subsidise the redevelopment of the hospital, GLA Officers are of the view that the applicant's preferred option (retention of the central clock tower block only) strikes the optimum balance when considered in the context of the overall scheme.

Scale and Response to Context (including Green Belt)

- The GLA consider that, notwithstanding the car park issue highlighted earlier, the architect has sought to carefully to manage the impact of the development on the Green Belt context. In their opinion, the key part of this approach has been the creation of a sensitive building height strategy that responds well to the suburban setting by mediating the consolidated hospital campus to the prevailing context of two storey houses.
- Having considered the verified views submitted in support of the outline scheme, the GLA Officers are satisfied that the application would have a negligible impact on the sense of Green Belt openness from the positions assessed.
- The GLA Officers would further support the continuation of low rise four to five storey flats along the northern stretch of the hospital access route where an adverse impact on the openness of the Green Belt can be avoided.

Masterplan Edges and Relationship to Adjacent Sites

- In taking forward the outline proposal the applicant will need to carefully consider how the edges of the Masterplan will be resolved in terms of their relationship with adjoining sites. This is particularly important at the interface with the mental health facility to the north, and the boundary with residential development at Spring Court Road to the west.
- Care should be taken to avoid any under-utilised or 'left over' spaces.

School Design

- Whilst the school plot has been earmarked, an indicative layout plan has been omitted.
- GLA Officers seek the submission of an illustrative layout in order to understand how the positioning of the school building(s), and points of access are likely to respond to the neighbouring residential development.

Inclusive Access:

- The GLA Officers expect that the design guide accompanying the scheme will enshrine the principles of inclusive design to accord with London Plan Policy 7.2.
- Future detailed building plans should clearly demonstrate how the proposed internal layouts and circulation spaces would be accessible to all.
- At a minimum the GLA Officers expect the Council to impose planning conditions to secure: 100% 'Lifetime Homes'; 10% wheelchair accessible / adaptable dwellings; and, detailed approval of a design guide to include a dedicated section on inclusive design.

Sustainable Development:

Energy Strategy

- London Plan Policy 5.2 requires all new major developments to achieve a 35% carbon reduction target beyond Part L 2013.
- The development would seek to exceed Part L 2013 by energy efficiency measure alone. This is supported, however, GLA Officer require representative benchmarked examples across typologies to evidence the technical feasibility of achieving the requisite savings.
- Evidence should also be provided on how the demand for cooling will be minimised through passive design measures.
- The energy strategy mentions the use of high efficiency chiller plant for cooling systems. It is assumed that this is for the hospital use, but should be clarified.
- The applicant is seeking to provide a community heat network which is expected to connect the hospital, school and residential units – with the potential to connect to the adjoining Mental Health Hospital also. This approach is strongly supported. The applicant should submit an illustrative plan of this site wide network (identifying the location and size of the energy centre), and confirm whether the retained buildings would also be connected.
- The applicant proposes to install a Combined Heat and Power system (CHP) of around 900kW thermal to drive the heat network effecting in a 31% carbon saving overall. It is unclear as to whether electrical output is to be used on site and hence this will need to be clarified.
- Photovoltaics have been specified and while acceptable, their location and output will need to be confirmed.

Climate Change Adaption

- GLA Officers expect the details of a landscaping strategy and sustainable drainage measures to be secured by way of planning condition.
- There are a number of trees throughout the site. When developing the Masterplan, the applicant has sought to retain high quality mature trees wherever possible, and to provide replacement and additional planting in accordance with London Plan Policy 7.21. GLA Officers are satisfied that, subject to normal tree protection measures it would be possible to retain a significant number of high quality trees at the site. Furthermore based on the information provided, GLA Officers are of the view that the loss of trees expected to occur as a result of the development would be outweighed by the proposed planting and associated landscaping strategy.

Transport (incorporating TfL comments):

- Car parking should be provided in accordance with London Plan standards and a car parking management plan should be secured across all uses at the site.
- Whilst the PTAL of the area is low, TfL is of the view that there should be an overall reduction in car parking within the subject scheme. TfL considers that a reduction in on-site parking, coupled with a robust travel plan, would encourage staff, patients, students, and residents to use sustainable transport modes.
- Under the Health and Social Care Act 2012 the London Borough of Enfield have a statutory responsibility to use their powers and resources across all sectors to protect and improve the health of their population. The harms to health of car use for trips which could be conducted on foot, bicycle or public transport are well documented in the medical literature.
- This proposal to increase parking is a significant concern given the implications for worsening health and increasing health inequalities. It is acknowledged that some parking is required for the hospital staff and visitors, however it is TfL's view that the level proposed is excessive. A reduction in parking would encourage staff, visitors and some patients (who are able) to walk, cycle, or use public transport.

Residential Car Parking

- The proposed ration for residential parking is 1:1. Having regard, to the PTAL, GLA Officers are of the view that such provision is acceptable.
- TfL supports the extension of the existing Controlled Parking Zone (CPZ). TfL expects the CPZ extension to be fully funded by the developer and secured as part of a s106 agreement.

School Car Parking

- The application proposed 35-40 car parking spaces for school staff as well as dedicated drop-off / pick-up areas for pupils.
- TfL consider that this level of parking for staff is excessive and requires further justification of this level of provision.
- The pick-up / drop-off points are broadly supported.
- Visitor parking provision should be considered.

Hospital Car Parking

- The development would result in the reduction of current levels of on-street / informal parking.
- Formal parking to the multi-storey car park is to be increased from 528 to 900 spaces.
- TfL consider that the proposed level of hospital car parking should be reduced, but nevertheless seeks further discussion with the applicant on likely demand, patient and staff numbers. In particular the proposed balance / allocation of patient relative to staff car parking is currently unclear.
- It is noted that staff will not be eligible for parking permits where they live within 1.5 miles of the site. This approach is supported in principle, but should be designed flexibly enough to take into account personal travel

circumstances. Staff should also be excluded from applying for local parking permits. These points will need to be secured via s106.

Cycle Parking

- Cycle parking should be provided in accordance with existing London Plan standards with a view to meeting the revised standards of the emerging Further Alterations to the London Plan.

Walking and Cycling

- The applicant has undertaken a Pedestrian Environment Review System (PERS) audit to assess the quality of the routes to and from the site. The audit identifies the need for a pedestrian crossing within the vicinity of Shooters Road. This should be secured through s106.
- In accordance with the principles of London Plan Policy 6.10, TfL seeks the sum of £44,667, towards 'Legible London' signage as part of a s106.

Public Transport Network

- TfL identifies that there are two bus stops within the site that will need to be upgraded to TfL's 'Landmark London' model, and comply with TfL's Accessible Bus Stop guidance.
- An up-graded on-site bus stand should be provided with a minimum stacking capacity for three buses. A stop post should also be provided in conjunction with a drivers toilet. A financial contribution of £30,000 is required for these works as part of a s106. The s106 agreement will also need to ensure that an appropriate legal mechanism will be in place to safeguard an access for buses on the section of the road network that will remain owned by the hospital.
- The Council should consider if it is appropriate for car club provision and membership incentives should be secured as part of the application.

Travel Planning

- A robust Travel Plan for the hospital, education and residential uses should be secured as part of the s106.

Deliveries, Servicing and Construction Logistics

- A construction logistics plan should be secured by way a condition or s106.

Conclusion:

- **Green Belt:** Whilst GLA Officers are of the view that a very special circumstances case has been made for the proposed location of a temporary school on the Green Belt at the site, the subsequent permanent car park use of the land has not been appropriately justified. The applicant is strongly encouraged to find a means of accommodating any necessary school staff / visitor car parking within the main school plot.
- **Health Facilities:** The proposed new health facility is strongly supported. Nevertheless, the net loss of healthcare floorspace does not comply with Policy 3.16. Accordingly, further discussion is sought on how the proposal

relates existing hospital operations; the objectives of the wider Barnet, Enfield, Haringey Clinical Strategy; and, opportunities for expansion in future.

- **Education Facilities:** The proposed new education facility is strongly supported. However, given the proposed land transfer arrangements, GLA Officers seek clarification on how the scheme will mitigate the impact of the proportion of educational demand directly attributable to the development. The applicant is also encouraged to progress proposals for the multiple use of school facilities for community and / or recreational use.
- **Housing:** The proposed residential mix and provision of family housing is strongly supported, however, the affordable housing offer is still to be determined. GLA Officers seek further joint discussions with the applicant and the Council with respect to re-provision of key worker accommodation and the maximum reasonable amount of affordable housing.
- **Urban Design:** The proposed outline Masterplan is supported in principle, however, further design detail is sought with respect to the proposed school. A design guide document is also sought to be secured to ensure that future reserved matters applications would appropriately address a number of detailed design points.
- **Historic Environment:** Whilst a significant proportion of a Victorian workhouse complex would be lost as a result of the proposed development, the most prominent architectural part of this non-designated heritage asset, GLA Officers are of the view that the public benefits associated with the enabled hospital development would outweigh the proposed loss.
- **Inclusive Access:** Planning conditions are sought to secure 'Lifetime Homes' standards, 10% wheelchair accessible / adaptable dwellings and a dedicated section on inclusive design within the design guide.
- **Sustainable Development:** Subject to a number of clarifications, the proposed energy strategy is supported and conditions / obligations are required to secure relevant measures.
- **Transport:** The proposal is broadly acceptable in strategic terms, however, the applicant should address issues with respect to car parking; cycle parking; walking and cycling; public transport network; travel planning; and, deliveries, servicing and construction logistics.

The resolution of these issues could lead to the application becoming acceptable in strategic planning terms.

4.1.2 The GLA have advised that if the Council resolve to make a draft decision on the application, it must consult the Mayor again and allow him 14 days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application, and any connected application.

4.1.3 A schedule of suggested conditions accompanied the response.

Environment Agency:

4.1.4 The Environment Agency advise that they raise no objection to the development subject to conditions to address surface water drainage.

Metropolitan Police:

4.1.5 The Metropolitan Police have requested that the application:

- Adopt the principles and practices of 'Secured by Design'; and,
- Complies with the physical security requirements within the current Secured by Design Guides for Hospitals, Schools and New Homes (Multi Storey if applicable) 2014 to include – Code for sustainable Homes – Section 1 The development – 'Layout and Design', Section 2 Physical Security (Building Control for Sustainable Homes Issues) and Section 3 Ancillary Security Requirements (Security requirements for additional or optional residential features)

Barnet, Enfield and Haringey Mental Health NHS Trust:

4.1.6 The Mental Health Trust strongly supports the current proposals for the redevelopment of Chase Farm Hospital. The Trust do not have any major concerns at this stage around the proposed new primary school and residential development on the area of the site which will become surplus to NHS requirements. However, given this is an outline planning application with all matters reserved, the Mental Health Trust request to be closely involved in the next stage of the site master plan development and the development of the full planning application.

4.1.7 The Mental Health Trust has several broad issues at this stage. These include:

- Ensuring there is no negative impact on the Trust's services and facilities, including the provision of car parking for Trust patients and staff.
- Ensuring continued vehicular and pedestrian access to the Mental Health Trust's land and buildings during and after the proposed redevelopment of the rest of the site.
- Ensuring that the boundaries between the Mental Health Trust's land and land in others ownership is clearly defined.
- A request to be consulted on the traffic management proposals for the redeveloped site, including an assessment of the impact of the proposed new school and residential development on the road infrastructure of the site. The Trust wishes to understand and be consulted on the potential impact of increased traffic from the proposed new homes and the proposed new school on any of its facilities and the road access to them.
- A request to be consulted on the proposed heights of the new hospital buildings as they are defined in more detail and of any implications for Mental Health Trust buildings.
- The Mental Health Trust operates a medium secure forensic mental health service on the Chase Farm site, known as the North London Forensic Service. Occasionally, there have been concerns from the public and others about potential security issues relating to this unit. The Mental Health Trust has worked with the Royal Free London to help manage any queries / issues that have arisen during the planning process so far relating to this unit and we will continue to do this. The proposed development of a new primary school on the Chase Farm site raises the potential for increased concerns, which the Mental Health Trust will need to be involved in responding to if they arise. The Mental Health Trust has a strong track record of managing the forensic service on the Chase Farm

site and the Trust is not aware of any incidents relating to the unit which have led to specific concerns from the public about the security of the unit. It is possible that the North London Forensic Service may wish to extend / expand its current facilities on the Chase Farm site at some point in the future and the Mental Health Trust would not wish a possible development of its forensic services in the future to be affected by the proposed residential development or a new primary school on the Chase Farm site.

Thames Water:

Waste Comments

- 4.1.8 With the information provided Thames Water, has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, we request that the following 'Grampian Style' condition be applied - 'Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed'. Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

Surface Water Drainage

- 4.1.9 With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater.
- 4.1.10 Thames Water would recommend that petrol / oil interceptors be fitted in all car parking / washing / repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Water Comments

- 4.1.11 The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

- 4.1.12 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 water 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 water utility infrastructure.

Supplementary Comments

- 4.1.13 A drainage strategy is required, detailing existing and proposed discharge rates for both foul and surface water discharges. This information must be provided for each point of connection to the public network. The existing Flood Risk Assessment (24/11/14) does not provide sufficient information. Such information is very important in assessing the impact of the re-developed site on the sewerage network. It is important to ensure that the proposed developments can be connected at appropriate locations and that sufficient capacity exists to accommodate those flows, without leading to an increased flooding risk on existing customers. If we still have concerns on receipt of further detail, we may request that a developer funded impact study is carried out.

Tree Officer:

- 4.1.14 The Tree Officer has indicated that he has no objection in principle to the scheme, commenting that there are a number of significant and good quality trees on the site that positively contribute individually or as groups to the amenity and character of the site (including the proposed school site).
- 4.1.15 As per the prior consultation with the developers the overwhelming majority of these trees have been sensibly retained where they will continue to contribute to the proposed development. Subject to conditions an appropriate Tree Protection Plan will be required to protect the trees during demolition and development of the site.
- 4.1.16 The trees that are to be removed to facilitate development are all of either poor quality and/or low amenity value and in accordance with current arboricultural guidelines should not be considered a constraint to development providing suitable tree replacement planting is carried out as part of the landscape scheme. The indicative landscape plan does include significant tree planting and subject to detail will enhance the site and be appropriate for this development. Again this will be required through suitable conditions.
- 4.1.17 The only area of contention on the site with regard to trees is the removal of several large mature oak trees currently located in the large grass area at the rear of the main hospital. Although it would be extremely desirable to retain these significant trees it is recognised that this area is required for the expansion of the hospital. Providing these trees are replaced by suitable semi-mature replacements as part of the landscape scheme and in consideration with the overall tree retention on the site, it is considered the removal of these trees is acceptable for the construction of a hospital.

4.1.18 It will be expected that the landscape scheme provides significant tree planting to replace tree removals and enhance the tree cover/quality of the site. Tree planting pits must be of a modern design providing a suitable tree growing medium of a suitable volume to support long-term establishment. In addition root barriers, structurally supporting root cells, irrigation, aeration, SUDS, etc. must be incorporated where appropriate.

Economic Development:

4.1.19 Officers commented that an employment and skills strategy is needed due to size of development as per s106 SPD.

Environmental Health:

4.1.20 The acoustic assessment puts forward acceptable noise limits for any new plant; for any application coming forward the following condition would be required:

No development shall take place until an acoustic report has been submitted to and approved by the Local Planning Authority. The report must set out the sound pressure level generated from combined plant and state the noise control measures to be employed to ensure the noise from the combined units does not exceed a level of 10dB(A) below background noise levels at the façade of any noise sensitive premises.

4.1.21 For the residential units the following condition would be required:

The development shall be constructed/adapted so as to provide sufficient airborne and structure borne sound insulation against externally generated noise and vibration. This sound insulation shall ensure that the level of noise generated from external sources shall be no higher than 35 dB(A) from 7am 11pm and 30 dB(A) in bedrooms from 11pm 7am measured as a LAeq,T. A scheme for mitigation measures shall be submitted to and approved by the Local Planning Authority prior to development taking place. The approved mitigation scheme shall be implemented in its entirety before any of the units are occupied/the use commences.

Urban Design:

4.1.22 Extensive pre-application discussions were undertaken between the Council and the applicant. While this resulted in a number of improvements to the proposed design, the Urban Design Officer indicates that a number of concerns remain. These principally relate to:

- The loss of the majority of the heritage assets on the site;
- The proposed massing of buildings (appearance and impact on green belt), without accompanying evidence that this can be made visually acceptable;
- The ability of the scheme to deliver the proposed number of units in a way that is acceptable in planning policy terms (for example, due to proposed front-front distances, the fact that some units do not meet internal GIA standards and that there are issues with internal layouts);

- The quality of the layout and building typologies (e.g. the inclusion of a block in space and the internal layout of flats and houses) and the reliance semi-basement parking for flatted blocks;
- There are also a number of other design issues that cumulatively create concerns for the overall quality of the development (e.g. exposed boundaries, positioning of building lines and boundary treatments).
- The inconsistencies between drawings, which introduce ambiguity regarding what approval is being sort for.

4.1.23 The officer goes on to comment that the quantum of development is such that it will effectively create a new neighbourhood. While the reprovision of modern and effective health care facilities is important, this does not have to be at the expense of the quality of the surrounding area and proposed accommodation. If approval is recommended, the Local Planning Authority will need to be satisfied that changes can be required at detailed planning stage in order to accommodate the proposed quantum of development in an acceptable manner.

Traffic and Transportation:

4.1.24 Traffic and Transportation raise no objections in principle to the development, the proposed access arrangements or the level of car parking proposed, subject to issues identified being addressed through condition and/or S106 Agreement. Their comments are discussed in greater detail in the analysis section of this report.

4.2 Public response

Phase One Consultation:

4.2.1 The application was referred to 1219 surrounding properties, a press notice released (as featured in the Enfield Independent on 10/12/14) and 5 site notices were posted on and around the site. The first phase of consultation expired 06/01/15 resulting in a 31 day consultation period. A total of 31 written responses were received in the first round of consultation objecting to the proposal on the following grounds (categorised for ease of reference):

Transport and Access

- Inadequate parking provision
- Increased traffic generation / congestion across the site, but with particular reference to Shooters Road, Comreddy Close, Hunters Way and Ridge Crest
- Impeded access to Ridge Crest
- Inadequate access to the interim and permanent schools
- Inadequate parking controls
- Lack of options for alternative accesses and access mechanisms to the site.
- Inadequate drop-off / pick-up provision
- Inadequate public transport provision
- Disruption during construction
- Insufficient access to site

School

- Increased noise and disturbance
- Inappropriate location for a school
- Inappropriate siting of a school so close to a secured mental health unit
- Loss of Green Belt land

Residential

- Lack of supporting infrastructure (including water and sewerage)
- Overdevelopment of the site
- Out of character and keeping
- Lack of amenity provision to 6 houses
- Lack of open space
- Increase strain on community facilities
- Loss of light
- Loss of outlook
- Loss of privacy
- Loss of key worker accommodation
- Overly dominant
- Loss of a historic asset
- Lack of retail provision to support additional housing
- Lack of wheelchair accessible homes or homes for the elderly

Hospital

- Inadequate provision of primary health care facilities
- Increased height of the development to The Ridgeway
- Continuity of healthcare provision
- Inadequate healthcare provision

Sustainability

- Adverse impact to ecology
- Loss of trees
- Increased risk of flooding
- Potentially contaminated land

General

- Insufficient viability / financial information

Rt. Hon Joan Ryan MP:

4.2.2 Registered an objection to the proposed access to Shooters Road. The impact to Shooters Road and Comreddy Close will be significant. This will include increased traffic generation and the road network at this point is too constrained to enable free movement.

4.2.3 In addition, an objection was lodged on the basis of the withholding of the financial viability appraisal.

Rt. Hon Theresa Villiers MP:

- 4.2.4 Registered her support for the scheme stating that the plans for new hospital buildings will result in improved facilities and important benefits for patients. The provision of 500 homes and a new school with assist in providing housing and starter homes in the area and keeping up with additional demand for school places.

Enfield Green Party

- 4.2.5 The Enfield Green Party made the following comments:

- Welcome the provision of a new hospital and accept that it is needed.
- Current application represents several lost opportunities.
- Insufficient Affordable Housing provision.
- Withholding of financial viability appraisal unacceptable
- Energy efficiency targets are too modest.
- Opportunities for the installation of solar panels should be exploited.
- The Local Planning Authority should require the development site to use renewable gas when deemed technically feasible.

Planning Panel:

- 4.2.6 A Planning Panel was held on 7th January 2015 at Highlands School to discuss the application. A full transcript of minutes of the panel is appended to this report.

- 4.2.7 Key issues raised can be summarised as follows (categorised for ease of reference):

Panel Members Comments

- Continuity of healthcare provision
- Disruption during construction
- Retention of Highlands Wing, its appearance and indication of lifespan
- Drop-off / pick-up arrangements
- Traffic congestion at The Ridgeway – is there an alternative access?
- Adequate future expansion provision

Ward Councillors

- Adverse impact to residents of Shooters Road

Consultation

- Inadequate consultation and insufficient time to review documents

Finance

- Failure to disseminate viability appraisal
- Funding model
- Potential loss of hospital services

Transport

- Increased traffic generation
- Increased congestion
- Lack of parking
- Adverse impact to residents of Shooters Road and Comreddy Close
- Lack of crossing points to The Ridgeway
- Restricted egress from Ridge Crest
- Fixed road layout
- Transport Assessment inadequate

Housing

- Need for Affordable Housing
- Overdevelopment of site and potential for increase in numbers
- Increased height to The Ridgeway
- Inadequate shopping facilities

Phase Two Consultation:

4.2.8 Following on from the issues raised in the Planning Panel and notably with regard to the dissemination of financial viability information, the Trust agreed to the production and publication of a redacted viability appraisal. In this regard, a decision was made to further extend the consultation period to 15/01/15.

4.2.9 In response to this extension, a further 14 written representations were received which largely reiterated the concerns raised previously with the exception of the following points:

- Potential loss of Highlands Wing for housing
- Concern over reduction in hospital floor area from that described and existing
- Potential for increase pollution
- Need for community centre
- Inadequate nursery places

Phase Three Consultation:

4.2.10 Having reviewed the objections raised, it was clear to Officers that the prevalent themes borne out of the consultation process to date related most critically to traffic and transportation issues in terms of traffic generation, highway and junction capacity, parking and access and servicing for the propose interim and permanent school buildings.

4.2.11 While such issues were already being discussed with the applicant and the Transport Assessment was in the process of being revised and updated with additional data, it was considered that with the degree of concern raised, it would be prudent to allow a further consultation period to disseminate additional revised information that directly addressed some of the issues raised and accordingly a third round of consultation was undertaken with residents following submission of additional documentation. The consultation period was over 14 days running from 12/02/15 to 26/02/15.

4.2.12 A further 11 written representations were received objecting to the development on the following grounds:

- A resident from Ridge Crest questioned the validity of the revised transport date.
- Impact to the junction of Ridge Crest and The Ridgeway must be minimised.
- Alternative access arrangements should be considered.
- Inadequate parking.
- Unacceptable impact to residential amenity as a result of the school provision.
- No defined need for a school.
- Impact to residents of Shooters Road.

4.2.13 Members are advised that a total of 3 letters of support were levied as part of the consultation process.

4.2.14 In addition comments were made in reference to the below issues:

- Asbestos removal
- Eviction of staff
- Loss of view
- Loss of A&E
- Provision of psychiatric units
- Maintenance and improvement of nursing care
- Concern over the type of healthcare provision
- Devaluation of home.

4.2.15 Members are advised that issues pertaining to the type, factor or form of healthcare provision provided by the Trust at the Chase Farm site is governed by the Barnet Enfield Haringey Clinical Strategy and is not within the remit of the planning system to control. Consequently, objections cited on the basis of the historic loss of an Accident and Emergency Department or indeed consequential pressure on alternative sites providing this function are not material in the consideration of the subject application.

4.2.16 The status of existing short hold tenancy agreements or the legal standings of existing residents currently occupying residential accommodation on the site also fall outside of the remit of the planning system to consider, albeit where the (re)provision of affordable housing as part of the proposed development will be discussed in detail in the body of this report.

4.2.17 The planning system can afford no material weighting to the retention of views and asbestos removal and subsequent Health and Safety considerations are dealt with under a separate legislative and regulatory framework. The devaluation of property is again not a material planning consideration.

5. Relevant Policy

5.3.1 The London Plan including Revised Early Minor Amendments (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 3.1 – Ensuring equal life chances for all
Policy 3.2 – Improving health and addressing health inequalities
Policy 3.3 – Increasing housing supply
Policy 3.4 – Optimising housing potential
Policy 3.5 – Quality and design of housing developments
Policy 3.6 – Children and young people’s play and informal recreation facilities
Policy 3.7 – Large residential developments
Policy 3.8 – Housing choice
Policy 3.9 – Mixed and balanced communities
Policy 3.10 – Definition of affordable housing
Policy 3.11 – Affordable housing targets
Policy 3.12 – Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 – Affordable housing thresholds
Policy 3.14 – Existing housing
Policy 3.15 – Coordination of housing development and investment
Policy 3.16 – Protection and enhancement of social infrastructure
Policy 3.17 – Health and social care facilities
Policy 3.18 – Education facilities
Policy 4.1 – Developing London’s economy
Policy 4.5 – London’s visitor infrastructure
Policy 4.12 – Improving opportunities for all
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 7.7 – Location and design of tall and large buildings
Policy 7.8 – Heritage assets and archaeology
Policy 7.9 – Heritage-led regeneration
Policy 7.14 – Improving air quality
Policy 7.15 – Reducing noise and enhancing soundscapes
Policy 7.16 – Green Belt
Policy 7.18 – Protecting local open space and addressing local deficiency

Policy 7.19 – Biodiversity and access to nature
Policy 7.21 – Trees and woodlands

Housing Supplementary Planning Guidance

5.3.2 Local Plan – Core Strategy

Strategic Objective 1: Enabling and focusing change
Strategic Objective 2: Environmental sustainability
Strategic Objective 3: Community cohesion
Strategic Objective 4: New homes
Strategic Objective 5: Education, health and wellbeing
Strategic Objective 6: Maximising economic potential
Strategic Objective 7: Employment and skills
Strategic Objective 8: Transportation and accessibility
Strategic Objective 9: Natural environment
Strategic Objective 10: Built environment
Core Policy 1: Strategic growth areas
Core policy 2: Housing supply and locations for new homes
Core policy 3: Affordable housing
Core Policy 4: Housing quality
Core Policy 5: Housing types
Core Policy 6: Housing need
Core Policy 8: Education
Core Policy 9: Supporting community cohesion
Core Policy 20: Sustainable Energy use and energy infrastructure
Core Policy 21: Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 24: The road network
Core Policy 25: Pedestrians and cyclists
Core Policy 26: Public transport
Core Policy 28: Managing flood risk through development
Core Policy 29: Flood management infrastructure
Core Policy 30: Maintaining and improving the quality of the built and open environment
Core Policy 31: Built and landscape heritage
Core Policy 32: Pollution
Core Policy 33: Green Belt and countryside
Core Policy 34: Parks, playing fields and other open spaces
Core Policy 36: Biodiversity

Biodiversity Action Plan
S106 SPD

5.3.3 Development Management Document

DMD1: Affordable housing on sites capable of providing 10 units or more
DMD3: Providing a mix of different sized homes
DMD4: Loss of existing residential units
DMD6: Residential character
DMD8: General standards for new residential development
DMD9: Amenity space
DMD10: Distancing
DMD15: Specialist housing need
DMD16: Provision of new community facilities

DMD17: Protection of community facilities
DMD18: Early years provision
DMD37: Achieving high quality and design-led development
DMD38: Design process
DMD42: Design of civic / public buildings and institutions
DMD43: Tall buildings
DMD44: Conserving and enhancing heritage assets
DMD45: Parking standards and layout
DMD47: New road, access and servicing
DMD48: Transport assessments
DMD49: Sustainable design and construction statements
DMD50: Environmental assessments method
DMD51: Energy efficiency standards
DMD52: Decentralised energy networks
DMD53: Low and zero carbon technology
DMD55: Use of roofspace / vertical surfaces
DMD57: Responsible sourcing of materials, waste minimisation and green procurement
DMD58: Water efficiency
DMD59: Avoiding and reducing flood risk
DMD60: Assessing flood risk
DMD61: Managing surface water
DMD62: Flood control and mitigation measures
DMD63: Protection and improvement of watercourses and flood defences
DMD64: Pollution control and assessment
DMD65: Air quality
DMD66: Land contamination and instability
DMD67: Hazardous installations
DMD68: Noise
DMD69: Light pollution
DMD70: Water quality
DMD71: Protection and enhancement of open space
DMD72: Open space provision
DMD73: Child play space
DMD76: Wildlife corridors
DMD77: Green chains
DMD78: Nature conservation
DMD79: Ecological enhancements
DMD80: Trees on development sites
DMD81: Landscaping
DMD82: Protecting the Green Belt
DMD83: Development adjacent to the Green Belt

5.4 National Planning Policy Framework

5.4.1 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions – an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:

- approving development proposals that accord with the development plan without delay; and

- Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or

Specific policies in the Framework indicate development should be restricted.

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

5.4.3 In addition, paragraph 173 of the NPPF states that in the pursuit of sustainable development careful attention must be given to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

5.5 National Planning Practice Guidance

5.5.1 On 6th March 2014, the Department for Communities and Local Government (DCLG) launched the National Planning Practice Guidance (NPPG) to consolidate and simplify 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.

5.5 Other Material Considerations

London Plan Housing SPG

Affordable Housing SPG

Enfield Market Housing Assessment

Providing for Children and Young People's Play and Informal Recreation SPG and revised draft

Accessible London: achieving an inclusive environment SPG

Planning and Access for Disabled People: a good practice guide (ODPM)

London Plan Sustainable Design and Construction SPG

Mayor's Climate Change Adaption Strategy

Mayor's Climate Change Mitigation and Energy Strategy

Mayors Water Strategy

Mayor's Ambient Noise Strategy

Mayor's Air Quality Strategy

6. Analysis

6.1 The main issues to consider are as follows:

- i. Principle of redevelopment to provide:
 - a. A new hospital up to 32,000 sq.m,
 - b. Residential development of up to 500 homes
 - c. The provision of an interim and permanent primary school for three forms of entry (630 sq.m and 3,600 sq.m respectively)
- ii. Development within and adjacent to the Green Belt;
- iii. Impact to non-designated heritage asset;
- iv. Design;
- v. Amenity of neighbouring properties;
- vi. Highway safety;
- vii. Sustainability and biodiversity;
- viii. S.106 Obligations; and
- ix. Community Infrastructure Levy

6.2 Principle

Hospital

6.2.1 The subject site comprises the Chase Farm Hospital complex with ancillary residential accommodation. The site is not within any existing or planned opportunity area or the subject of an Area Action Plan. However, the site has been the subject of a series of planning applications seeking residential redevelopment of at least a portion of the site, two of which have been approved.

6.2.2 London Plan Policy 3.17 and CP7 of the Core Strategy seeks to support the provision of high quality health appropriate for a growing and changing population, with a flexibility of form that can adapt to meet identified healthcare needs, including the provision of urgent care centres. The Council is committed to work with the Enfield PCT, NHS London, and other public and private sector health agencies in delivering appropriate proposals for new health and social care facilities. The principal aim of the subject application is the reprovision of an enhanced healthcare facility servicing the borough. Given the current use of the site as a hospital, it is clear that the principle for the continued use of at least a portion of the site for this function is established. However, the development would result in the reduction of overall floor area, with an existing complex providing a range of services over 41,556 sq.m of floor area. The current scheme shows the rationalisation of the hospital complex to the northern portion of the site and would comprise the retained Highlands Wing and a new purpose built hospital block providing up to 32,000 sq.m of new floor area, which in taking account of the retained Highlands Wing would result in the creation of a healthcare facility with 36,723 sq.m of floor area overall – a net reduction of 4,723 sq.m.

- 6.2.3 As has been identified by the Greater London Authority (GLA) in their Stage 1 consultation response, and from comments made both through responses at Planning Panel and written representations from residents, it is clear that an overall loss of hospital floor area is of concern and can be held to be contrary to the provisions of London Plan Policy 3.16 and CP7 of the Core Strategy. A Healthcare Management Plan has been submitted with the application, and through negotiation and in response to the public consultation, a revised and updated Health Management Plan has been provided to fully operationalise the redevelopment strategy.
- 6.2.4 In accordance with this document, the services at Chase Farm Hospital have been determined by the Barnet Enfield and Haringey (BEH) Clinical Strategy. The BEH Clinical Strategy is underpinned by a need to improve clinical safety and increase medical and nursing staff to recommended levels. In relation to the Chase Farm site, an objective of the BEH Clinical Strategy investment programme was to *'ensure that services at Chase Farm Hospital are concentrated on a smaller footprint and in higher specification buildings and that outpatient services are concentrated into a single building that enables improvements in efficiency.'* The Chase Farm Hospital complex is spread over 14.9 hectare plot of land with a healthcare service base that has evolved over the decades with an ad hoc expansion programme that has resulted in a site where services are disparate and within a largely inefficient layout. The applicant contends that the existing buildings are generally not fit-for-purpose, causing problems with accessibility and resulting in a poor patient experience.

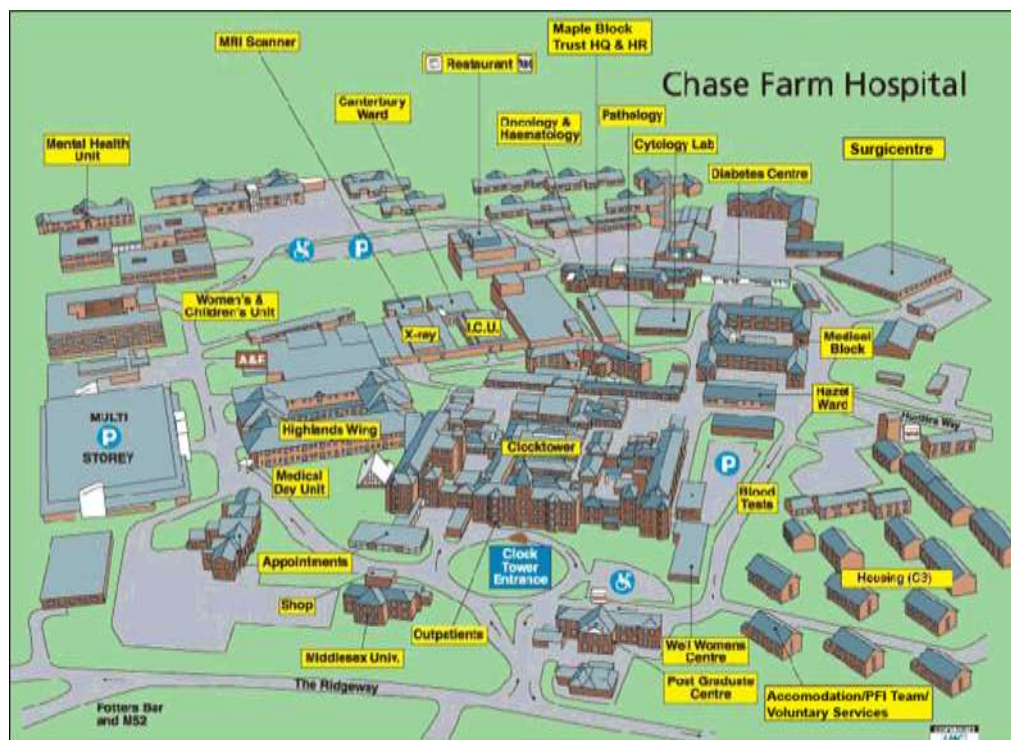


Illustration 1: General Arrangement of Buildings on the Site

- 6.2.5 While maintaining an operational base in recent years, the dilapidation of a number of buildings on the site area such that in 2012, backlog maintenance costs were assessed at £25,363m for the site. While works to address this deficit have occurred over recent years, the level of backlog remains significant and the applicant submits that a programme of continued

maintenance works are disruptive and inconvenient to both patients and staff, with works of any significance also carrying the clinical risk that they will disrupt services for patients. In any case, it is argued that the current repair and maintenance strategy in the short to medium terms is wholly unsustainable and would, by factor and degree, undermine healthcare provision at the site.

- 6.2.6 A six facet survey was undertaken in 2012 to ascertain the condition of each of the buildings, their functional suitability, their utilisation, quality, health and safety and environmental credentials of each of the site buildings. The survey adopts a 5 grade ranking protocol as shown in the table below:

Rank	Description
A	Excellent/as new condition (generally less than 2 years old). Expected to perform as intended over its expected useful service life.
B	Satisfactory condition with evidence of only minor deterioration. Element/Sub-Element is operational and performing as intended.
C	Poor condition with evidence of major defects. Elements/Sub-Element remains operational but is currently in need of major repair or replacement.
D	Unacceptable condition. Non-operational or about to fail. Has reached the end of its useful life.
X	Supplementary rating added to D only to indicate that it is impossible to improve without replacement.

Table 1: Ranking Protocol

- 6.2.7 The six facet survey concluded that a number of the buildings on site were in a poor condition and at the end of their operational life. The survey is featured in Annex II of the Health Management Plan, but for ease of reference can be summarised as follows:

Survey Heading	Chase Farm Hospital
Physical Condition	Only 29% of the Chase Farm Hospital site is in condition 'B' or above. This is generally in the newer buildings such as Highlands Wing.
Functional Suitability	33% of the estate achieves condition 'B'. 66% is assessed as condition 'C'. 1% (vacated space) is assessed as condition 'D'.
Space Utilisation	88% of the space as Chase Farm Hospital is fully utilised.
Quality	Assessed at condition 'B / C' with circa 10% at condition 'D'.
Statutory Compliance	61% is rated at condition 'B'. 38% is rated at condition 'C'. 1% is rated as a category 'D', however, these blocks are not used.
Energy	36% is category 'B'.

Table 2: Summary of Six Facet Survey

- 6.2.8 The Healthcare Management Plan therefore asserts that the physical layout of the site has a negative impact on patient care with an inefficiency of form that creates physical barriers preventing patients from gaining direct access

to care provision. The ability to provide single rooms to isolate patients and prevent the spread of infection is a significant challenge as the single room ratios available on the site at present do not meet current guidelines for delivering patient privacy and dignity standards. This, coupled with some clinical services located to temporary buildings at the end of their serviceable life, is such that they have a negative impact on the ability of the hospital to comply with Health Briefing Note / Health Technical Memorandum compliance to the standard expected of a modern healthcare facility. The inherent inefficiency of the site is such that the Trust estimates that the hospital will make a loss of circa £20m on an income of £88m. The Trust claims that radical improvement is urgently needed in order to put the hospital on a stable financial footing and facilitate its continued operation.

6.2.9 The Trust contend that the redevelopment of the site and the creation of a hospital in a consolidated, rationalised and more efficient form would yield significant healthcare benefits for the area with:

- enhanced patient experience through better privacy and dignity.
- increased efficiency and productivity of clinical services serving to reduce waiting times and repeat visits.
- improved quality of the estate securing fit-for-purpose accommodation for clinical services.
- significant investment in the hospital to increase the sustainability of service delivery on site, offering greater reassurance of the Trust's continued commitment to healthcare provision on the site.

6.2.10 Indeed, the reported numerical deficit belies the advantages of a consolidated and rationalised site, capable of meeting with modern standards of healthcare provision. Indeed, the BEH Clinical Strategy identifies that the Trust will need in the region of 25,000 sq.m of floor space to accommodate the programmed services, but as part of the application has sought a higher figure to allow for a flexibility of form, better designed the react to and reflect the clinical demands made for the site. In addition, through negotiations at the pre-application stage, the Local Planning Authority has sought to secure the reservation of sufficient future expansion space to install a greater degree of flexibility within the site to ensure that over the long term Chase Farm Hospital is capable of expanding and adaption to the changing demands / needs of the population resulting in a further 8,000 sq m of expansion space (indicated in the light grey areas to the east and west of the main hospital and Highlands Wing respectively) and the potential for a 70% net uplift in developable land surrounding the hospital plot. To ensure such land is safeguarded for the expansion requirements of the hospital, the Local Planning Authority expect this to be secured through condition or s106 to restrict land uses in this area to hospital uses.

6.2.11 A Health Impact Assessment has been submitted with the application. Following on from the Planning Panel and relevant consultation responses raising concern over primary healthcare provision derived from the residential development (notably in the form of GP provision), the Trust have revisited the assessment and have confirmed that up to 800 sq.m of floor area will be reserved within the hospital development for the provision of primary healthcare facilities, the type and function of which will be determined by an assessment of need at the point of delivery. This too will be secured by way of s106 agreement.

6.2.12 While concerns have been raised over a continuity of service over the construction period, the Trust has committed to a phasing and decant programme that will ensure the continued function of the site throughout the redevelopment process. This again will be secured by condition or s106 agreement with the submission of a detailed phasing strategy to minimise any potential disruption. It is acknowledged that concerns have been raised in relation to the type and form of healthcare service provision on the site and the desire to control / maintain existing healthcare provision, however, it is not within the gift of the Local Planning Authority to exercise control over the nature of the services provided. The factor and form of services provided is governed by the Barnet Enfield Haringey Clinical Strategy and relevant supporting evidence base. Thus, considerations are limited to the principle of the hospital use rather than the services it provides both now and in the future. It must be recognised that the provision of a hospital in itself is a defined commitment to continued healthcare provision, and the flexibility in form sought by this outline application is such that the development will be better positioned to respond to the identified needs of the wider community in accordance with London Plan Policies 3.16 and 3.17 and CP7 of the Core Strategy.

Housing

6.2.13 The delivery of the hospital is entirely dependent on the cross-subsidy of the redevelopment by The Treasury, the Royal Free London NHS Foundation Trust and sale receipts from the disposal of the wider hospital site. In this regard, the outline application proposes the comprehensive redevelopment of the land to the south of the relocated and rationalised hospital site to provide up to 500 residential units involving the demolition of 7,877 sq.m (GIA) of residential floorspace or the equivalent of 310 bed spaces, described as 'key worker' accommodation, albeit on a assured short hold tenancy basis. Historically, the presence of these ancillary residential units has ensured that the principle of a residential uses to the site and indeed and intensification thereof has been deemed as acceptable. However, Policy 3.14 of the London Plan states the 'loss of housing including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.' Core Policy 5 of the Core Strategy follows on from this establishing a framework with which to prevent the loss of homes including affordable units. However, in both instances where comprehensive redevelopment is proposed, the wider social economic and environmental benefits of the regeneration must be taken into account, development thus should seek to enhance the quality area and accommodation provided to create a balanced sustainable community.

6.2.14 In numerical terms, it is clear that the development results in a significant uplift in the number of residential units to the site and hence in Policy terms it is considered that the development meets the relevant tests prescribed where there is a loss of units to a site. However, it is noted that the stated designation of the existing units as 'key worker' accommodation ensures that the units would fall within the definition of affordable housing set out by London Plan Policy 3.10 and Policy CP3 of the Core Strategy. While issues relating to the delivery of affordable housing will be dealt with under the S106 section of this report, it is important to establish the principle of a scheme that would result in a numerical loss of affordable housing provision and an issue that has formed the substance of a number of objections to the scheme.

6.2.15 On this basis, the Trust has submitted a clarification statement relating to the existing housing provision on the site. In taking this document into account, from observations made on site and having regard to the comments of an Inspector at Appeal under ref: TP/06/0789, it is clear that once again the numerical assessment of the number of lost units actually belies the reality of the number of retained and viable key worker units located to the site. The existing units comprise a mixture of 1960s / 1970s flats, houses and bungalows in varying states of repair. At Appeal, the Inspector commented:

'...The appeal site extends to some 3.95ha. It is divided by Hunters Way, a private access road connecting Lavender Hill to the main service road around a campus of hospital and other health care buildings sprawling across land to the north. The western part of the appeal site is a largely flat rectangular plot of about 2.83ha. Apparently strewn across a roadside area (although actually laid out in 2 rigid rows) are 7 utilitarian blocks of 2-storey buildings set down amidst an area of unenclosed grass; that bleak setting is somehow emphasised by the trees along the road frontage. The blocks were 'designed' in the late 1950s to accommodate 'bachelor units' for nurses and trainee doctors; then, most medical staff were required to do a residency as part of their training or terms of employment. A common arrangement is for both floors to consist of 6 'study bedrooms' grouped around a shared kitchen and bathroom. The 'study bedrooms' are dismal: the bathrooms old, stained and peeling: and, although some renewal has occurred in some of the kitchens, most appear to be caught in a time-warp of neglect that still exudes an ambience reminiscent of the 1950s.

Not all those blocks still provide accommodation. One has been transformed into an office: another is boarded up due to subsidence. But, that collection of structures presents a prospect of dilapidation and decay to those passing by on The Ridgeway (to the west) or Lavender Hill (to the south). The bleakness of the blocks themselves and their stark largely unadorned setting is accentuated by the occasional collapsed gutter and the cracked unpainted window, too often adorned by dirty rag-like curtains.

"Newer housing occupies the part of this site closer to Hunters Way. Here rows and 'courtyards' of small terraced dwellings or 2-storey blocks of self-contained flats are laid out beside pedestrian paths. These buildings offer more modern accommodation, being erected during the latter half of the 1970s. They faithfully exhibit some the exigencies of the time; stairs are narrow and cramped, cheap wooden window frames are warped and unpainted and the separation between facing façades sometimes seems minimal. A tall tower-like building looms above the modest dwellings accommodating the necessary services...

...It is accepted (very fairly, I think) that there has been no major investment in that accommodation since it was erected in the late 1950s and 1970s...'

6.2.16 The housing stock was inherited by the Trust on the purchase of the site in July 2014 and it was clear at that point that there had been no material

improvement in the condition of the existing housing stock since the time of the Inspectors observations. Indeed, of the 238 units on site, the Trust has indicated that 163 of the units are in such poor condition that they are not considered capable of being occupied without major remedial work and currently stand as derelict. The fundamental deficiencies of the existing stock relate primarily to the following:

- layout and basic design;
- space standards;
- build quality;
- repair;
- energy efficiency; and
- unit density.

6.2.17 Consequently, these factors conspire to create a substandard form of accommodation that severely under-utilises a viable brownfield site and one that fails to meet the needs of the borough, but also of the Trust in the wider operations of the hospital.

6.2.18 In addition, the inherited nature of the accommodation was such that there is no legal or planning restriction on the occupation of residential units at Chase Farm and in accordance with the submissions made by the applicant would not qualify as key worker accommodation in accordance with Royal Free London NHS Foundation Trust's adopted housing admissions policy. As a result of this, some units had been let to occupants that would otherwise be considered capable of securing suitable accommodation in the private market.

6.2.19 This clearly dilutes the potential provision of what would be considered to be 'key worker' or affordable housing provision in accordance with accepted definitions and hence the weighting afforded to the retention of current provision on site is undermined. Indeed as part of their review of operations at Chase Farm, the Trust has concluded that the new consolidated hospital would generate the need for 90 allocated bed spaces for 'key workers' subject to the Trust's admission policy or a total of 53 residential units. In this regard – and excluding additional affordable housing provision – the Trust has submitted that 53 units would be reserved for key worker accommodation either administered by the Trust or a Housing Association on their behalf. The majority of the new key worker units at Chase Farm are likely to be allocated to frontline staff delivering healthcare at the new hospital. Many of these individuals might otherwise fall into the 'Group 3' category set out in Enfield's Allocations Scheme 2012-2017. In absolute terms, the proposed site provision will better reflect stated key worker needs as a result of the hospital redevelopment and would ostensibly serve to alleviate pressure on Enfield Council's Housing Register.

6.2.20 In this regard, it is considered that the adopted redevelopment strategy would be compatible with Policies 3.3, 3.4 and 3.14 of the London Plan and Core Policy 5 of the Core Strategy insofar as it provides an addition to the Borough's housing stock which actively contributes towards both Borough specific and London-wide strategic housing targets and would, by factor and degree, reprovide key worker accommodation at a level sufficient to accommodate the need generated by the new hospital. In addition significant weight must be given to the enabling economic driver for the residential

element of the scheme to cross-subsidise the new hospital and to provide vital, modern and fit-for-purpose healthcare provision to the benefit of residents and the wider community.

Education

6.2.21 The NPPF states that Local Planning Authorities should give weight to the need to create, expand or alter schools to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. Policy CP8 of the Core Strategy states that the Council will contribute to improving the health, lives and prospects of children and young people by supporting and encouraging provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. New facilities should be provided on sites that offer safe and convenient access by pedestrians, cyclists and public transport users, and schools will be encouraged to allow the use of buildings for other community purposes in the evenings and at weekends.

6.2.22 This is reinforced within policy 3.18 of the London Plan which supports and promotes the needs for additional school places in London to correlate with both housing and population growth. The Policy states:

'In particular, proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.'

6.2.23 The provision of school and early year's provision is also encouraged in the Development Management Document with Policies DMD16 and 18. As submitted, the subject application seeks to construct 3,600 sq.m (GIA) of educational floor space to provide a 3 form entry primary school with approximately 35 car parking spaces and a 1000 sq.m Multi Use Games Area (MUGA). On the basis of current need, the application is also seeking consent for the provision of a 630 sq.m (GIA) temporary school.

Need / Site Selection

6.2.24 The Council has a statutory responsibility to provide enough school places to meet demand. The Greater London Authority population projections and the associated School Roll Projections are used to assess the future demand, which is then compared with current capacity, capacity soon to be available (i.e. where building works are underway to deliver extra provision) and planned capacity (i.e. where there is a specific plan and funding available for extra provision). This assessment, by Schools and Children's Services, includes Council-funded projects and academy or free school projects. The assessment is undertaken on an area basis for primary school places using six primary place planning areas: The subject site is within the North Central area.

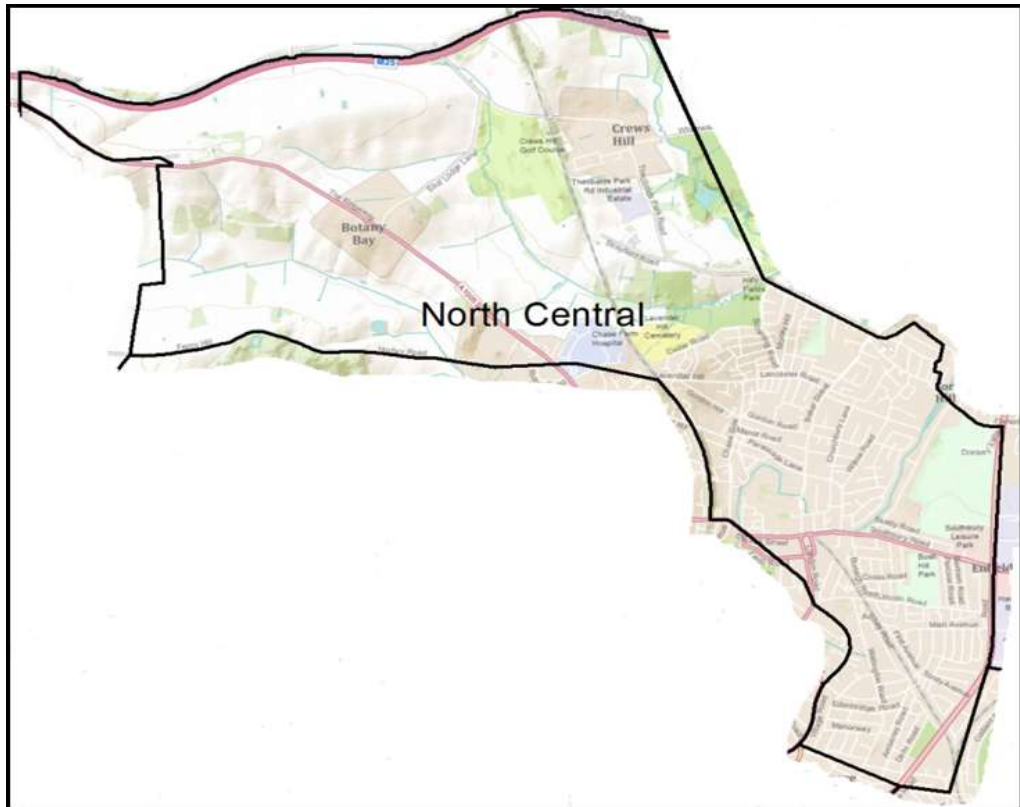


Illustration 2: North Central Area

6.2.25 The Education Authority has submitted supporting evidence for the provision of a new school to the site. The evidence demonstrates that the North Central area of the borough is one of particular demand, compounded by the lack of available options to deliver school expansions. The assessment was reported in the July 2014 Cabinet report on pupil places and set out the demand for this area as one additional form of entry for September 2015 (to meet demand and create some surplus to support parental choice) then a further additional form of entry from September 2019 (to maintain a degree of surplus capacity).

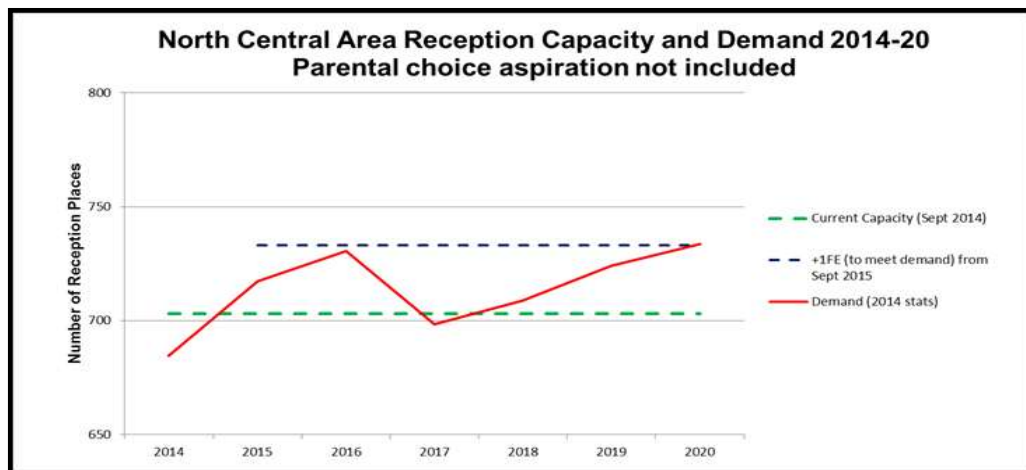


Figure 1: Capacity and demand to 2020

6.2.26 However, the assessment did not take account of the projected increased child yield and subsequent demand of the Chase Farm redevelopment site and the provision of up to 500 new residential dwellings. In consideration of

this increase in residential accommodation in the North Central Area, the assessment was revisited and it was concluded that a further form of entry would be required to accommodate the increased needs derived from the development. Therefore, the total forecast demand for the North Central area is for a 3FE primary school. It was concluded that one form of entry was required to accommodate demand for primary school places from September 2015 with a further two forms of entry forecast for delivery by September 2017. The temporary school would thus accommodate the immediate needs of the borough, before the substantive future requirements are accommodated by the permanent school.

6.2.27 It is recognised that a number of representations have been made by members of the public relating to the demonstration of need for a school to the locality, both in terms of the suitability of the location (juxtaposed with clinical and mental health facilities), but also the capacity of surrounding highways to accommodate the use. While the traffic and transportation issues will be discussed in a later section, it is important to establish the rationale by which the subject site was selected as suitable for school development.

6.2.28 Relevant Policies seek to locate new school as close to the population they serve as is practicable and consequently site selection is subjected to sequential testing to establish suitable locations. In this regard, the need for a new primary school within the North Central Pupil Place Planning area must be met within that catchment and accordingly, in sequential terms, the number of sites analysed must be limited to this catchment.

6.2.29 In undertaking a search for alternative sites, the Council took into account three principal considerations:

- the Department of Education’s area guidelines for mainstream schools (BB103) seek a site area of 2.1 hectares for a 3FE primary school;
- the school building and playing fields should be on a single site for efficiency, safety and optimum curriculum outcomes; and
- the site must be available in time for the temporary school to be completed for September 2015.

6.2.30 Three categories of alternative sites to accommodate the school within the North Central area were also considered:

- existing school sites;
- other London Borough of Enfield owned sites; and
- non-London Borough of Enfield owned sites.

6.2.31 The sites were assessed against a number of criteria, including: site size and configuration; accessibility; availability (e.g. ownership, usage, legal constraints); and planning policy constraints (e.g. open space, conservation). The results of the assessment of alternative sites carried out by the Education Authority are summarised below.

Project	Extra Capacity	Description of Feasibility Work
Chase Community	+2FE primary capacity	Assessment of the existing site concluded that there was not enough land available to

		<p>expand to provide primary accommodation and give flexibility to allow a further secondary expansion if required post-2018.</p> <p>Acquisition of an adjacent site was the route to addressing this issue and it was potentially available through the market. However enquiries and initial discussion with the owner did not result in any progress and initial design work to “integrate” primary accommodation on the current site resulted in substantially higher costs and could still not leave enough space to support a future secondary expansion. On that basis the project was proven unfeasible.</p>
Chase Side	+1FE primary capacity	<p>Expansion of primary accommodation for this school was always dependent on a land acquisition. Initial discussions were held with the land owner and some progress was made. However further discussions led to the conclusion that the land owner was not interested in selling to a timescale that matched our need to provide places.</p> <p>On that basis the project was proven unfeasible.</p>
St Johns	+0.5FE primary capacity	<p>As a Voluntary Aided school the London Diocesan Board of Schools undertook feasibility work for this scheme. The outcome was that a significantly higher budget would have been required than provided by government funding. On that basis the project was proven unfeasible.</p>

Table 3: Existing School Sites

6.2.32 In terms of the existing school sites, it was concluded that none of the identified sites were suitable for the quantum of expansion indicated by the needs assessment. Consideration was therefore shifted to the lower tiers of the sequential approach.

School	Findings
Enfield Grammar Lower School (Academy)	Expansion not possible due to significant issues stemming from the listed nature of the buildings
Enfield County Upper School	Expansion not viable based on discussions undertaken with school
St Andrew's C of E Primary	Expansion not viable based on discussions undertaken with school
St George's RC	Expansion not possible due to site size and configuration
St Anne's Catholic High School	St Anne's is relocating to Oakthorpe Road campus and this site will be disposed of, however

	acquisition is not viable due to their own estate plans
The Raglan Junior School	Expansion not possible due to site size and configuration
Edmonton Upper school (Cambridge Campus)	Not suitable for Primary School provision due to access constraints
Bush Hill Park Primary	Expansion not possible due to site size and configuration
Kingsmead Academy School (Secondary)	Academy's own expansion plans prevent use for primary provision
George Spicer Primary School	Expansion not possible due to site size and configuration
George Spicer Primary School Annexe	No further expansion possible following recent provision of new annexe
Enfield County Lower School	Expansion not possible due to conservation issues, playing field usage and planning policy constraints (designated Local Open Space)
Lavender School	Expansion not possible due to access issues, playing field usage and planning policy constraints (designated Local Open Space)
St Michaels C of E Primary	Expansion not possible due to site size and configuration
St Johns C of E Primary	Expansion not possible due to site size and configuration

Table 4: Other schools

Site	Findings
Enfield Playing Fields / QEII Stadium	Development prevented by planning policy (entire site is Metropolitan Open Land) and historic covenant
Bush Hill Park	Development prevented by planning policy (designated Local Open Space)
Holtwhites Hill Sports Ground	Site not available due to long-term lease and development prevented by planning policy (designated Local Open Space)
Hilly Fields Park	Development prevented by planning policy (entire site is within the Green Belt and designated Local Open Space)
North Enfield Recreation Ground	Development prevented by planning policy (designated Local Open Space)

Table 5: Other owned sites

Site	Findings
British Legion, Holtwhites Hill	Not viable due to site / building size
Acorn Car Site	Acquisition not viable due to multiple ownerships and long-term leases, also costly remediation of contamination required

Comfort Hotel	Acquisition not viable as site recently sold to a hotel consortium
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Table 6: Other non-owned sites

6.2.33 The assessment undertaken by the Education Authority has concluded that there are no alternative sites suitable for to accommodate a 3FE primary school, which includes the specific need generated by the residential development proposed for this site. In this regard and mindful of the immediate need to provide 1FE to accommodate the existing need for primary school places by September 2015, it is considered that the subject site is the most viable option for the provision of an intermediate and permanent school. Whilst the objections of residents are noted, particularly in relation to the juxtaposition of a school within close proximity to a secure mental health unit, assurances have been given both by the Mental Health Trust and the Education Authority that sufficient security measures are in place to ensure that both uses could operate on the site as proposed.

6.2.34 The provision of a school to the site is necessary to directly accommodate increased need for school places as a result of the residential development. It will also provide a key community focus and function to the wider development site, with a clear commitment from the Education Authority, that the new facilities will be available for community use outside of school operating hours. This contributes to the creation of a viable, balanced and overall sustainable community.

6.2.35 However, the acceptability of the scheme must be qualified by other relevant material considerations namely: the quantum of development, housing mix, density, affordable housing provision, impact of the development upon designated Green Belt land, loss of a non-designated heritage asset, sustainable development, accessibility, transport / parking, construction impacts, trees and ecology of site, and the impact of the development upon neighbouring residential units.

6.3 Development Within and Adjacent to the Green Belt

6.3.1 As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

6.3.2 When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

6.3.3 The National Planning Policy Framework (NPPF) states that Local Planning Authorities 'should regard the construction of new buildings as inappropriate in Green Belt'. Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

6.3.4 In addition certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

- mineral extraction;
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction; and
- development brought forward under a Community Right to Build Order.

6.3.5 The subject scheme seeks to utilise designated Green Belt land to Shooters Road to provide a temporary school structure to accommodate immediate needs for primary school places. The land is currently described as a playground (although no formalised play areas exist on the site) and comprises a grassed area bounded by a line of trees to the north, east and west. The site is clearly discernible from the surround and if properly maintained would provide a valuable community resource to the surrounding area and certainly provides an element of visual amenity to the surround easing the transition from the urban edge to a more rural and leafy character beyond.

6.3.6 Following on from comments received from the Greater London Authority and the concerns raised by Council Officers, plans to convert the area into a permanent car parking facility servicing the school have been withdrawn. In this regard, the Education Authority have confirmed that the car park will be located within the main school site and that the interim school will be present on the site for a period not exceeding 3 years and once the permanent school has been completed, the temporary school will be removed and the land reinstated.

6.3.7 In this regard, the transient nature of the use must carry significant weight in deliberations, which coupled with the established need for primary school places to the locality and the absence of viable alternative sites, is such that the 'very special circumstances' required to justify this element of the scheme can be held to have been met and is a point that is supported by the Greater London Authority. Furthermore, the context of site is such that the proposed two-storey structure for the interim school would be contained within a plot with an established and densely vegetated facing boundary, would serve to soften the impact of the development to the surround and largely screen its presence from designated Green Belt land radiating out to the north east.

- 6.3.8 This given, the Local Planning Authority are at liberty to levy conditions to ensure that the scheme includes an enhanced landscaping strategy and secure the restoration so the land after the temporary use has ceased, effectively serving to reintegrate the land back into the Green Belt. On this basis, and following the removal of the permanent car park associated with the main school, it is considered that the development would comply with the provisions of London Plan Policy 7.16, CP33 of the Core Strategy, DMD82 of the Development Management Plan and the NPPF.
- 6.3.9 However, Policy DMD83 of the Development Management Document also seeks to govern development adjacent to the Green Belt, or development deemed to impact upon its setting. In this regard, proposed development located next to or within close proximity to the Green Belt will only be permitted if all of the following criteria are met:
- a. There is no increase in the visual dominance and intrusiveness of the built form by way of height, scale and massing on the Green Belt;
 - b. There is a clear distinction between the Green Belt and urban area;
 - c. Views and vistas from the Green Belt into urban areas and vice versa, especially at important access points, are maintained.
- 6.3.10 In addition, proposals should maximise opportunities to incorporate measures to improve the character of land adjacent to the Green Belt through environmental improvements such as planting and earth moulding, and the removal or replacement of visually intrusive elements such as buildings, structures, hard standings, walls, fences or advertisements.
- 6.3.11 Development must not restrict future public access/ rights of way from being provided. Where possible proposed development should increase opportunities for public access.
- 6.3.12 Following on from pre-application discussions, the Council requested a Visual Impact Assessment (VIA) to accompany the scheme. Four wireline viewpoints were agreed to form the basis of the analysis as these areas were deemed to offer the most conspicuous views of the site from the surrounding Green Belt (see illustration below). As originally submitted, Council Officers considered that the visual analysis – contained within the Design and Access Statement – was not sufficiently robust to demonstrate the potential harm to the setting of the Green Belt, due largely to the lack of detail accompanying the analysis and an absence of seasonal analysis. In response to this, the Trust commissioned a further standalone study which was duly submitted on 9th February to allow its inclusion within the reconsultation.

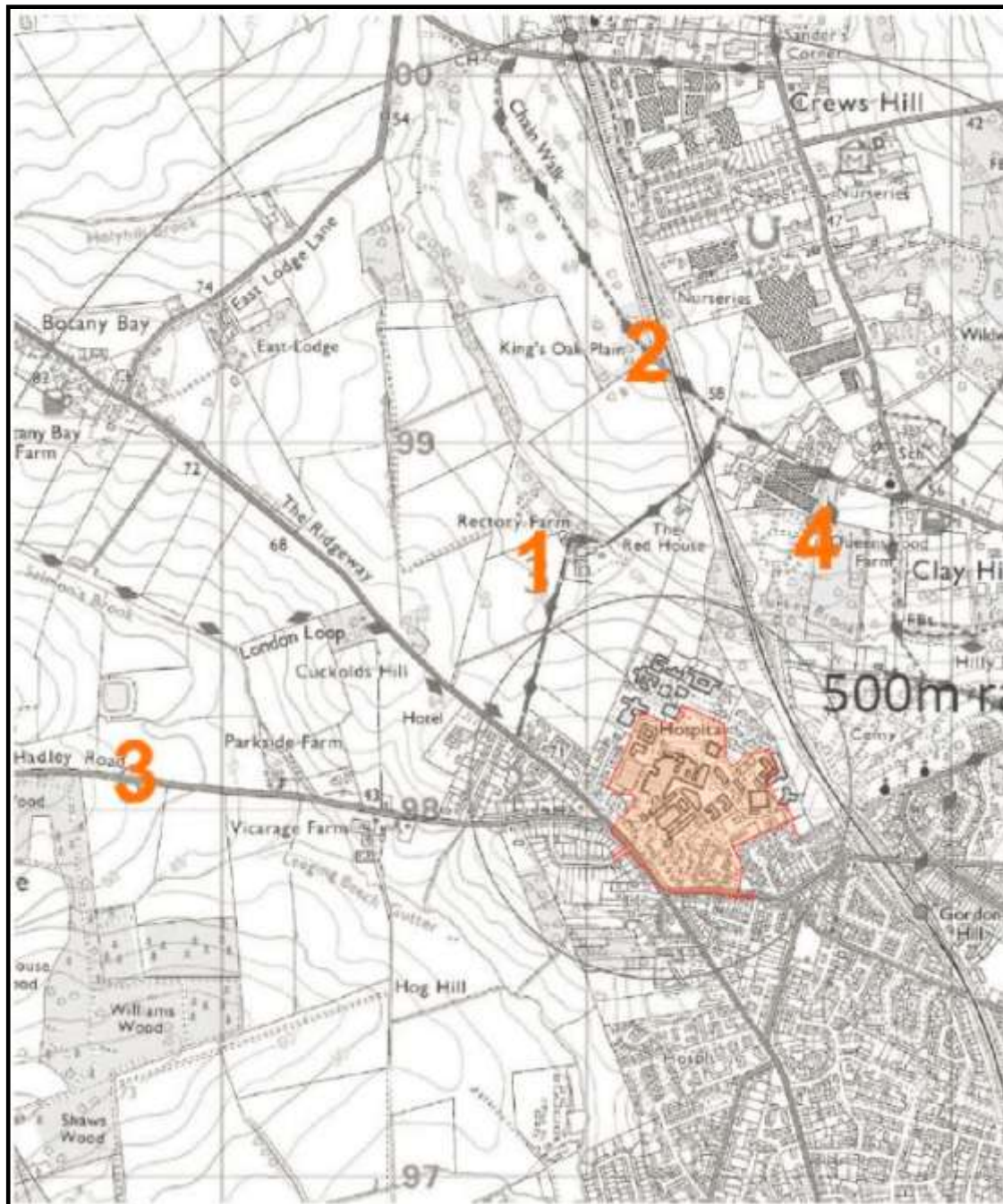


Illustration 3: VIA vantage points

6.3.13 The analysis concluded that the impact of the development from a number of the vantage point would largely be screened by vegetation or seen within the context of an established urban edge. Views from the Strayfield Road Cemetery to the north east of the site (due to the surrounding topography) was by far the most conspicuous location for views to the hospital site, however, views toward the site that were capable of exposing the hospital site were limited to the north east corner of the cemetery as it stretches out towards Clay Hill. Even from this vantage point, views across the site were fleeting as existing vegetation and the Gordon Hill railway bridge would quickly obstruct views as individuals travelled down the steep gradient.

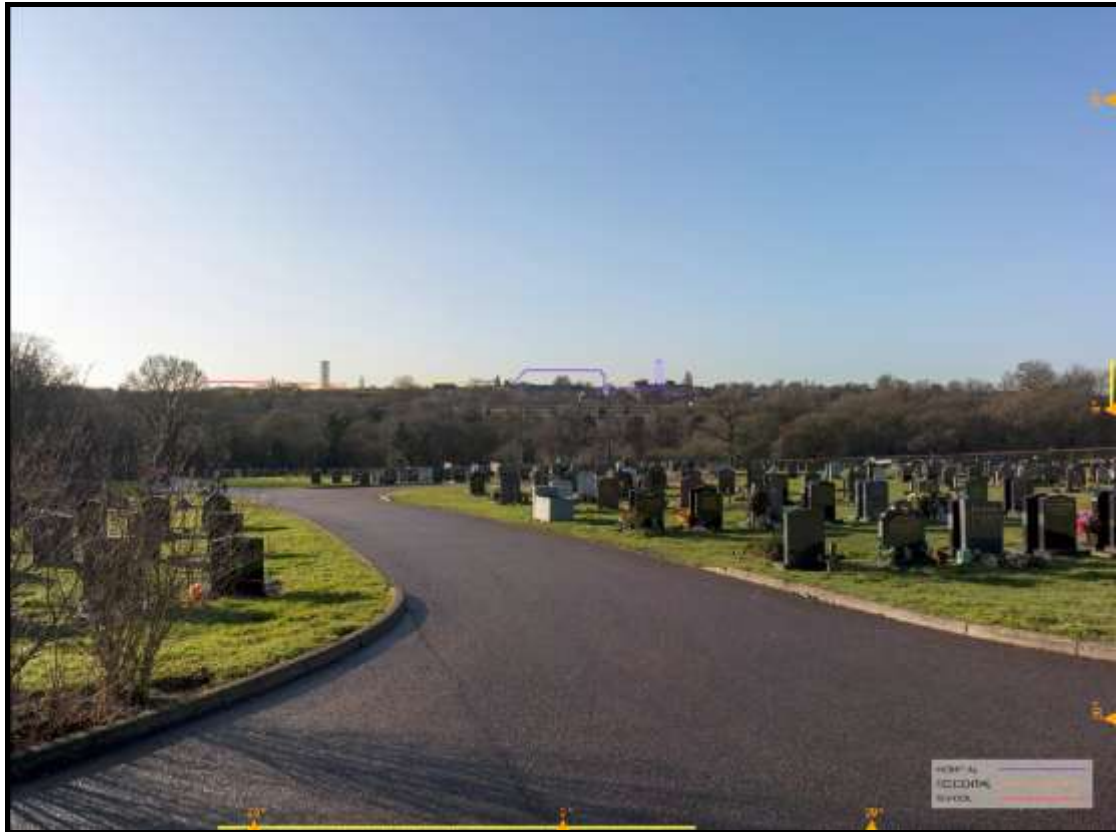


Photo 1: View point 4

6.3.14 In this regard, Policy DMD43 of the Development Management Document seeks to manage the design and siting of tall buildings. By virtue of the Policy tall and large buildings are define as those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor. In relation to developments within or adjacent to Green Belt sites, tall buildings are considered to be inappropriate.

6.3.15 While it is acknowledged that the overall bulk and massing of the site would be increased as a result of the development, the Visual Impact Assessment is correct in its assertion that the from each of the vantage points (and in particular the one to the cemetery), the presence of the existing hospital is already visible and would serve to define an accepted urban edge. The imposition of further development to the site would remain within such a context and the site would still be read in the same manner, particularly where the overall height of the buildings remain within examples existing site parameters albeit where the overall quantum of development is increased.

6.3.16 Indeed, in consultation with the Council's Urban Design Officer and mindful of the comments made by the GLA, it is considered that the increase in scale to the centre of the site responds positively to the constraints of the site and its relationship to the surrounding Green Belt responding positively to the utilitarian requirements of an efficient hospital building and its subsequent bulk and mass to successfully mediate between the suburban low rise setting to the consolidated hospital campus.

6.4 Impact to a Non-Designated Heritage Asset

- 6.4.1 The NPPF states that *Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.* In addition, the document requires that the LPA *take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal* (paragraph 129). In relation to non-designated heritage assets the NPPF along with the provision of CP31 of the Core Strategy and DMD44 of the Development Management Document allows an assessment of effect of an application on the significance of a non-designated heritage asset in the determination of planning applications and in *'weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'* (paragraph 135).
- 6.4.2 The historic core of the Chase Farm Hospital site is derived from the Clock Tower complex to the centre of the site. Heralding from the 1880s, the complex was initially a workhouse school for disadvantaged children. By around 1938 the former school began its life as a formal hospital, providing care for the elderly and expansion derived from this use quickly followed with the formation of two additional wards and ad hoc piecemeal expansion ever since. Despite attempts to list the structure in 1999, English Heritage concluded that the structure was not significantly innovative and when *'set against other examples of this type, it is not thought to be listable.'*
- 6.4.3 The Clock Tower, thus, remains unlisted and is not located within a Conservation Area nor does its feature as part of a Local List. However, at pre-application stage and in accordance with the NPPF, Officers considered the contribution of this building to the site and character of the surrounding area to be significant enough to warrant consideration of the complex as a non-designated heritage asset and afforded weighting in deliberations.
- 6.4.4 In response to this the applicant was invited to conduct a Heritage Assessment and feasibility testing that sought to operationalise the relative merit of the asset and explore various options allowing complete or partial retention of the building. The completed report examined the criteria set out by Government in the *Principles of Selection for Listed Buildings* (March 2010) document in the assessment of the Clock Tower complex as well as providing an analysis of the implications for the financial viability of the site across 4 refined development scenarios, namely:
- **Option A** – Retention of 'original' buildings (whether for hospital or residential purposes);
 - **Option B** – Retention of the central block (whether for hospital, residential or school purposes);
 - **Option C** – Retention of the central block and two-storey portion of the southern wing; and,
 - **Option D** – No retention.
- 6.4.5 In terms of significance, the assessment indicates that the primary interest of the building lies within its original function as a workhouse rather than as a hospital complex and while the cumulative and evolving history of the site would have weighting, in practical terms much of the original fabric of the

former workhouse school has been lost. The decision of English Heritage not to list the structure in 1999 must also be attributed weight, and it is clear from their assessment that and a type and function of Victorian building, more valuable and intact examples exist and hence the real and substantive interest of the building is reduced to the architecture of the building itself.

- 6.4.6 As part of their submission, it was clear that the wholesale retention of the Clock Tower complex would significantly undermine the legibility of the site and the operational base of the principal hospital use and thus Option A was discounted at an early stage.
- 6.4.7 In this regard, whilst the retention of the original building in its entirety would be the preferred option for the Local Planning Authority its implications for the wider Masterplan were evident and a more pragmatic approach must be adopted to balance the range of considerations and the wider social imperative to maintain and enhance the principal hospital use. Indeed, given the cross-subsidising function of the remaining site and the need of the applicant to maximise the capital receipt of the stated land parcels, in accordance with paragraph 173 of the NNPF weight must also be attributed to the realised deliverability of the subject scheme and the critical mass in terms of number of units required to make the scheme viable.
- 6.4.8 In this regard, a viability statement has been submitted and independently assessed by the Council's expert consultant. The consultant concludes that the assumptions and relevant calculations featured within the reports are reasonable and valid to ensure that the scheme is deliverable and consequently that the development is sensitive to any increases in build costs or subsequent reduction in unit yield. Through each of the scenarios additional comparative cost analysis has been provided, the results of which indicate that while Option C would show a slight uplift in the numbers of units to the site (to 489 overall) and was the favoured option of the Urban Design Officer, the associated refurbishment costs coupled with the state of disrepair of the building is such that the retention of the Clock Tower and wing would result in a loss of 2.4m in overall land value when compared to the complete demolition Option D.
- 6.4.9 Such a loss, particularly where the viability of the scheme is so delicately balanced is such that a clear justification for discounting a further option. Even the preferred Option B as posited by the applicant would result in a loss in overall land value to the tune of £300,000, but mindful of the concerns of the Local Planning Authority and the clear Policy preference for the retention of the heritage effort so far as would be practicable, it was considered by the Trust that such a loss could be accommodated by the scheme and from the perspective of the LPA would strike the optimum balance in considerations. Indeed, this approach would ensure that the most architecturally striking element of the scheme was retained for prosperity, providing a historic anchor to the development site, contributing to an overall sense of place and given its location within the development site and adjacent to the main entrance would create a prominent landmark feature. Thus, while it is acknowledged that the vast majority of the asset would be lost as a result of the redevelopment of the site, in having regard to its significance, the potential implications for viability and the delivery of the hospital, Officers are satisfied that the public benefits associated with the enabled hospital redevelopment would outweigh the substantial loss of the asset.

6.5 Design

Density

- 6.5.1 For the purposes of the London Plan density matrix, it is considered the site lies within a suburban area due the fact that the surrounding area is characterised by lower density dwelling typologies. The site has a Public Transport Accessibility Level of 2 indicating a moderate level of accessibility to alternative transport modes.
- 6.5.2 In this regard, the density matrix suggests a density of between 150 and 250 habitable rooms per hectare. The character of the area indicates that the average unit size in the area has between than 3.1 – 3.7 rooms. This suggests a unit range of 40 to 80 units per hectare. The site area given over for residential development is 8.109 hectares. While the precise type and mix of units of the site would feature at reserved matters stage and hence a calculation of density based on habitable rooms is not possible, this outline application seeks consent for up to 500 residential units. The applicants Planning Statement confirms that this would equate to a density of 62 units per hectare and would therefore remain within threshold values.
- 6.5.3 However, it is acknowledged that advice contained within the NPPF and the London Plan Interim Housing Design Guide suggests that a numerical assessment of density must not be the sole test of acceptability in terms of the integration of a development into the surrounding area and that weight must also be given to the attainment of appropriate scale and design relative to character and appearance of the surrounding area balanced against wider considerations of the critical mass of units required to drive the cross-subsidy and consequently the deliverability of the scheme. Thus, the density range for the site must be appropriate in relation to the local context and in line with the design principles in Chapter 7 of the London Plan and Core Strategy Policy 30: Maintaining and improving the quality of the built and open environment and commensurate with an overarching objective that would seek to optimise the use of the site and will be discussed in the following section.

Layout, mass, bulk and height

- 6.5.4 Consistent with the core principles of the London Plan, the Core Strategy and Development Management Document well considered, high quality, designed development is central to achieving a balanced and sustainable development. Developments should be of the highest quality internal, externally and in relation to the wider environment providing an attractive and functional public realm, clear legible for users, but one that adapts to changing needs and fosters a sense of community. New development is required to have regard to its context, and make a positive contribution to local character.
- 6.5.5 While at outline stage, an illustrative Masterplan has been submitted for consideration, regard must be given to this document particularly where principles relating to the quantum of development are to be established and in particular the ability of the development site to accommodate relevant unit numbers whilst paying due regard to adopted standards. Through the pre-application stage, extensive feedback was provided to the applicant to better inform the illustrative Masterplan and, as can be evidenced from the Design

and Access Statement, the Masterplan has evolved significantly from its inception. Notwithstanding comments made under the Green Belt section of this report, it is considered that the indicative Masterplan works well to consolidate and rationalise the site, with strong physical road links that puncture the site and add to its legibility, while simple perimeter blocks serve to replicate a wider suburban character and helps to create identifiable street frontages. The bulk, scale and massing of the development, through negotiation achieves critical mass to the centre of the site achieving 5 storeys and providing the larger apartment blocks to the site. It was considered that this responds well to the more utilitarian requirements of the hospital and provides a clear 'ceiling' height that dictates the overall scale of the development and how this responds positively to the sensitivities of the adjacent Green Belt land and views across the site. Echoing the comments of GLA Officers, the illustrative Masterplan successfully mediates with the low density suburban edge and the consolidated bulk of the hospital campus.

6.5.6 However, in consultation with the Council's Urban Design Officer and number of issues were raised in relation to the following:

- the design of the typologies posited;
- the allocation and use of rear amenity to the flatted developments;
- the creation of dead frontages as a result of elements of the scheme turning its back on the public realm and the reliance of the apartment blocks on semi-basement parking;
- the absence of articulation and visual breaks in the apartment block and hospital campus;
- the ability of the development to achieve requisite distancing standards to the front and rear of properties as well as to relevant vehicular accesses and carriageways;
- the proximity of blocks to the Clock Tower;
- the interface with the mental health facility and Spring Court Road as well as how the edges of the development will be resolved in relationship with adjoining sites (including school site layout and design);

6.5.7 At Planning Panel, concerns were also expressed in relation to the overall height of development to the Ridgeway and Lavender Hill where it is considered that the development would need to feature low rise typologies to respond directly to the prevalent character of the surrounding area. While the production of a full Design Code was encouraged by GLA Officers at pre-application stage, the applicant has sought to secure such detail as part of a condition. Given the evolution of the Masterplan over the pre-application process, it is clear that the issues raised could, if taken to their logical end, actually result in a reduction in the number of units across the site or a slightly augmented mix which may be less favourable in planning terms. However, in response to this, while the applicant would maintain that such detail would be best secured by condition, in taking account of the comments and issues raised by Officers, a *Framework Design Code* was commissioned by the applicant to address the matters raised.

6.5.8 At the time of writing the Framework Design Code has not yet been released for consideration and while it is considered that the overall quantum of development posited could, in numerical terms, be accommodated within the site and that the plans associated with the site are indicative at this stage, the list of issues and concerns raised are such that it is clear that the detailed

design work at reserved matters stage must carefully and robustly respond to these points. Any and all responses to materials released following circulation of this report, will be reported as late items at Planning Committee.

Residential Standards

6.5.9 Policy 3.5 of the London Plan seeks to ensure that housing developments are of the highest quality internally, externally and in relation to their context and to the wider environment. Table 3.3, which supports this Policy, sets out minimum space standards for dwellings. The draft Housing SPG and London Housing Design Guide build on this approach and provide further detailed guidance on key residential design standards, including the need for developments to avoid single aspect dwellings that are north facing, where exposed to noise exposure categories C or D, or contain 3 or more bedrooms. Core Policy 4 reiterates the need for high quality design in all new homes, clearing reference relevant guidance above.

6.5.10 The London Plan contains minimum standards for the size of new residential accommodation that replaces the Councils Supplementary Planning Guidance. The following figures are relevant for consideration of the proposed development:

Unit type	Occupancy level	Floor area (m²)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
2 storey houses	2b4p	83
	3b4p	87
	3b5p	96
	4b5p	100
	4b6p	107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

6.5.11 In the development of the illustrative Masterplan, the applicant has developed a series of unit typologies utilising minimum space standards adopted by the London Plan to establish a set of maximum parameters by which the quantum of development suitable for the site could be explored. While some discrepancies have been identified in the stated typologies, as identified by the Urban Design Officer, a review of each identifies that such discrepancies are relatively minor in nature and thus on balance it can be held that the typologies would comply with London Plan standards as a minimum, with design issues resolved through the reserved matters and detailed design process. This adds weight to deliberations that seek to establish a quantum of development for the site and taken with comments made in the previous section, give greater comfort to the Local Planning Authority that the numbers of units proposed can be accommodated on the site. While issues remain

outstanding, it is considered on balance that such issues can be addressed by the applicant through the submission of the Framework Design Code and as part of a condition attached to any consent.

Housing Mix

6.5.12 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing. Recent guidance is also set out in the Housing SPG (2012). Also relevant is Policy 1.1, part C, of the London Housing Strategy which sets a target for 42% of social rented homes to have three or more bedrooms, and Policy 2.1, part C, of the draft Housing Strategy (2011) which states that 36% of funded affordable rent homes will be family sized.

6.5.13 Core Policy 5 of the Core Strategy seeks to ensure that '*new developments offer a range of housing sizes to meet housing need*' and includes borough-wide targets housing mix. These targets are based on the finding of Enfield's Strategic Housing Market Assessment and seek to identify areas of specific housing need within the borough. The targets are applicable to the subject scheme and are expressed in the following table:

Tenure	Unit Type	Mix
Market Housing	1 and 2-bed flats (1-3 persons)	20%
	2-bed houses (4 persons)	15%
	3 bed houses (5-6 persons)	45%
	4+ bed houses (6+ persons)	20%
Social Rented Housing	1 and 2-bed flats (1-3 persons)	20%
	2-bed houses (4 persons)	20%
	3 bed houses (5-6 persons)	30%
	4+ bed houses (6+ persons)	30%

6.5.14 While it is acknowledged that there is an established need for all types of housing, the study demonstrates an acute shortage of houses with three or more bedrooms across owner occupier, social and private rented sectors.

6.5.15 As submitted, the subject scheme has provided an illustrative mix accompanying the Masterplan to provide 482 residential units broken down into the following:

Housing Type	Unit Numbers	Mix
1 bed properties (houses and flats)	63	13%
2 bed properties (houses and flats)	139	29%
3 bed properties (house and flats)	190	39%
4 bed properties (houses)	90	19%

In accordance with submitted figures the proposed development would fail to achieve the housing mix targets stipulated by Core Policy 5 with what would seem to be an overconcentration of smaller 1 and 2-bed accommodation. However, regard must be given to the particulars of the site and both its

suitability for family sized accommodation, but also the implications for the deliverability of the scheme.

- 6.5.16 In accordance with the submitted figures it is clear that the development does not quite achieve a compliant mix (which given the affordable housing offer discussed in a later section would largely comprise market units) with an overrepresentation of 2-bed units. However, notwithstanding the fact that the mix is purely illustrative for the purposes of establishing a workable quantum of development, the provision of family sized accommodation is welcomed particularly in the clear preference for house typologies in the illustrative Masterplan. This would more directly align with Enfield's Strategic Housing Market Assessment (SHMA) which identifies a more notable shortfall in this form of accommodation. This given, the Local Planning Authority would seek to ensure that the degree of deviation from the indicative mix is controlled so as to align as closely to a Core Strategy compliant mix as is demonstrably viable, and hence a mix range will feature as part of a s106 agreement. This has been agreed by the applicant and will be subject to review at reserved matters stage.

Inclusive Access

- 6.5.17 The application seeks outline consent with matters of detailed design reserved. In consultation with GLA Officers and mindful of the provisions of London Plan Policy 7.2, Policy CP4 of the Core Strategy and DMD8 of the Development Management Document, all residential units must be designed to Lifetime Homes standards with an additional 10% of units either fitted out to be fully wheelchair accessible or capable of being fitted out for such a function. Given the indicative typologies presented by the applicant in relation to establishing a quantum of development on site, it is considered that there is sufficient flexibility in form and layout to secure compliance with relevant standards and hence this will feature as a condition on any consent.
- 6.5.18 In addition, the importance of extending the concept of inclusive access to the neighbourhood level as well as through the design of the landscaping and public realm must be taken into account. While it is acknowledged that there are significant topological differences across the site which ensures that a level change across the development is unavoidable and due regard must be given to ensuring that highway and public realm design takes account of relevant London Plan accessibility standards to allow accessible, step free routes throughout the site. Pedestrian crossings will need to be provided with dropped kerbs and tactile paving, providing safe and legible access to all public spaces. In this regard, a full specification of measures to secure inclusive access across the public realm and at neighbourhood level will be required via condition.

Child Playspace / Amenity Provision

- 6.5.19 London Plan policy 3.6 requires that development proposals that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Based on the illustrative residential mix presented and the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), the GLA has calculated an expected child population of 190 for the development. On this basis, the SPG indicates that the development would need to make provision for 1,900 sq.m of children's play

and informal recreation space. The illustrative Masterplan indicates that 2,000 sq.m of open space for children's play and informal recreation will be provided as part of the development. Given that the application is outline, it has been agreed that child play facilities will be secured via s106 agreement.

6.5.20 The Development Management Document and in particular Policy DMD9 sets minimum standards for residential amenity provision within the Borough and seeks to prioritise function of the resultant space of a numerical assessment of simple form and outline standards for the application of amenity provision both as an average across the site, but also as a minimum for individual units. Whilst a Design Code has been omitted from the scheme, the illustrative Masterplan and design approach taken by the applicant has sought to incorporate relevant standards to establish the overall quantum of development. Amenity provision will take the form of private balconies and communal amenity provision for the flats and private gardens for the houses. It is clear that isolated examples of constrained private amenity provision exists in a handful of instances across the site, and questions have been raised by the Urban Design Officer in relation to communal provision for the some of the flatted blocks. However, it is considered that the capacity work to date has demonstrated that the minimum space standards required can be achieved on the vast majority of the site to the degree that the Local Planning Authority can be satisfied that the quantum of development sought can be accommodated and in any case can be secured by condition.

6.6 Impact of Neighbouring Properties

6.6.1 Policy DMD8 of the Development Management Document seeks to ensure that all new residential development is appropriately located, taking account of the surrounding area and land uses with a mandate to preserve amenity in terms of daylight, sunlight, outlook, privacy, noise and disturbance. In addition, DMD10 imposes minimum distancing standards to maintain a sense of privacy, avoid overshadowing and to ensure that adequate amounts of sunlight are available for new and existing developments.

6.6.2 The context of the site is such that the only likely impact of the development to neighbouring properties would be limited to the residential units lying to the south of the school site (namely to Shooters Road, Comreddy Close and Albuhera Close) and Spring Court Road adjacent to the proposed extended multi-storey car park to the north-west. Objection letters have been received from residents surrounding the site and notably from the most affected roads. Whilst objections from residents to The Ridgeway and Lavender Hill are noted, it is considered that the degree of separation afforded by these classified roads is such that the development will not have an adverse impact upon residential amenity through a loss of light, privacy, outlook or indeed a sense of overbearing, notably where it is clear that the illustrative Masterplan has concentrated the bulk and massing of the site to its centre allowing low rise single family dwellings to the periphery. These units would not exceed 3 storeys and in design terms at reserved matters stage would be required to remain low rise to assist in the transition of the site towards the hospital complex. An objector has cited concerns relating a loss of view as a reason for objecting to the scheme. Under the Town and Country Planning regime issues relating to rights to a defined view are not a material consideration.

6.6.3 The development is outline with all matters except access reserved. In this regard, the detailed design of the development has been omitted. However,

an illustrative Masterplan, indicating the scale and massing of the scheme has been submitted. In accordance with the stated objective of distancing standards that seek to allow the admission of adequate daylight and sunlight to residential developments to secure an acceptable quality of accommodation for prospective residents, daylighting/sunlighting study has also been submitted with the application at the request of the Council. While it is acknowledged that the Council does not currently have specific daylight/sunlighting standard thresholds, through the adoption and application of the Code for Sustainable Homes and the Housing Design Guide, the use of BRE Report 209 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice' in the measurement of daylighting is an applicable methodology by which an assessment of the impact of the scheme can be conducted.

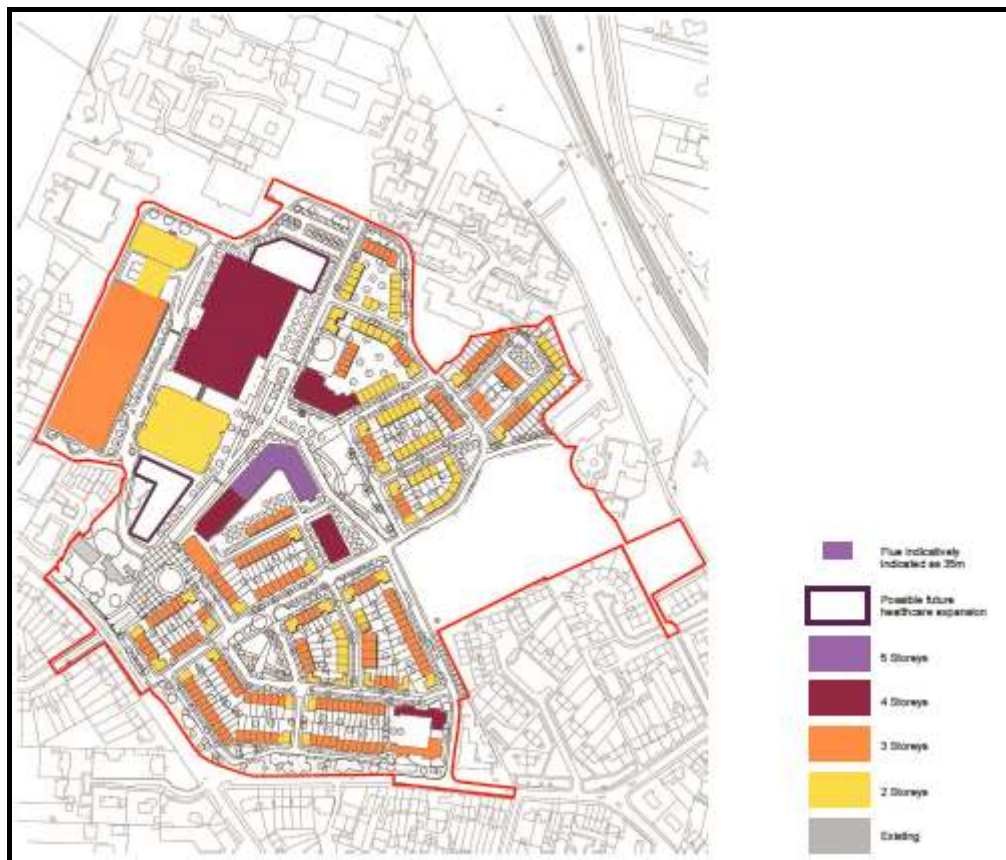


Illustration 4: Scale and Massing

6.6.4 BRE Report 209 indicates that acceptable minimum daylight penetration would be expressed in terms of an Average Daylighting Factor and set at the following levels:

- 1% for bedrooms
- 1.5% for living rooms
- 2 % for kitchens (or combination living spaces)

6.6.5 The study examines the results of daylight and sunlight tests to all of the neighbouring properties laying to the periphery of the site. The methodology adopted by the report states that sufficient daylight is achieved if the angle between the roof-level of the proposed development and the mid-point of the lowest utilised window of the neighbouring building is greater than 25°. Where

details of the windows are unknown the guidance states that a height of 1.6m from the ground is taken as a representative mid-point. The mid-point is extended across the length of the façade. This criterion can be simply checked geometrically, where the planes do not intersect the proposed building structure sufficient daylight penetration is assumed. In relation to the two areas deemed to be most directly affected by the proposal, daylight / sunlight modelling indicates that the 25° measure would not be breached either in relation to the school to the south and to the multi-storey car park to the north-west indicating that the development would not result in a loss of light to habitable rooms of these properties.

- 6.6.6 Indeed, in relation to properties lining the school site, their relative orientation to the south of the development would clearly benefit the properties in terms of daylight access and, having regard to the separation of the built form afforded by a no build zone and the rear gardens to properties lining Shooters Road and Albuhera Close in relation to the permanent school, and a minimum 22m separation to the rear of properties lining Comreddy Close for the interim school site, is such that the school development would not adversely impact upon residential amenity to these properties.
- 6.6.7 To the north-west, the existing three storey multi-storey already maintains a minimum separation of 22m to the properties lining Spring Court Road, and in terms of outlook would already be discernible from these properties. The decision to extend this structure to accommodate additional car parking would not bring the built form any closer to the rear of the properties and the 22m separation would be maintained throughout. Furthermore, having reviewed the context of the site it is clear that the rear boundary treatments to the rear of the site are relatively densely vegetated and while it is clear that the development would be discernible from the surrounding area, its overall impact would be no worse than currently experienced and in any case would remain compliant with the distancing standards adopted by DMD10 of the Development Management Document.
- 6.6.8 Moreover, in having regard to the shadowing analysis, modelling of the site and its relationship to Spring Court Road across the Winter Equinox, Summer Solstice and Winter Solstice (where it is deemed that the potential impact would be most acute) it was clear that in terms of shadowing, the development would have a limited impact, typically casting shadow to the garden areas of the affected properties in the early hours of the morning. Afternoon and evening sun would not be affected due to the relative orientation of the site. It is also worth noting that shadowing analysis does not take account of existing obstructions or vegetation within the affected properties, which in themselves may create overshadowing more directly.
- 6.6.9 It is noted that an objector to Spring Court Road has cited a loss of privacy as a result of the development. Notwithstanding that fact that the development would accord with relevant distancing standards, the function of the car park is such that that it provides a servicing function ancillary to the hospital use and by design and nature would not encourage individuals to loiter.
- 6.6.10 On the basis of the above, it is concluded that the outline application at the quantum stated would not adversely impact upon residential amenity through a loss of light, overshadowing, outlook, privacy or sense of overbearing.

Noise and Disturbance

6.6.11 Policy DMD68 of the Development Management Document states that development that would generate or would be exposed to an unacceptable level of noise will not be permitted. Where permissible, developments must be sensitively designed, managed and operated to reduce exposure to noise and noise generation. Particular regard should be given to the following:

- a. Building design;
- b. Layout of rooms;
- c. Positioning of building services;
- d. Landscaping
- e. Sound insulation;
- f. Hours of operation and deliveries.

6.6.12 Development involving potential noise generating development will only be permitted in appropriate locations, where there is no adverse impact on amenity.

6.6.13 A number of objections have been received from residents of Shooters Road, Comreddy Close and Albuhera Close citing the potential for increased noise and disturbance generated by the school as a reason to object to the scheme. Whilst it is acknowledged that the creation of a school would result in a potential increase in noise and disturbance to the area due to the increased level of activity on the site, from children playing outside and indeed as a result of general vehicular activity associated with primary schools, it is considered that such peaks would be restricted to a limited periods over the working day and would not extend late into the evening or at weekends and for many would occur while they are out of the house. Clearly at present residents do enjoy a degree of tranquillity, given the context of the site, but it is considered that a range of measures to enhance sound insulation, landscaping measures and actively manage the school run periods of the day would be such that any adverse impact could be minimised and it is not considered that the harm to residents would outweigh the significant benefits of the scheme.

6.6.14 In relation to the hospital use, it is clear that the site already functions for this purpose and hence it is likely that any resultant noise and disturbance generated would be no greater than the existing scenario. Colleagues in Environmental Health have assessed the acoustic assessment submitted by the applicant and are satisfied that suitably worded conditions will be sufficient to attenuate noise from associated plant and machinery including the proposed energy centre.

6.7 Highway Safety

Site Context

6.7.1 The application site is situated on the site of the current Chase Farm Hospital, bordered by The Ridgeway and Lavender Hill: both are classified roads. Existing access points from The Ridgeway, Hunters Road / Lavender Hill will be retained. Shooters Road will also provide outbound access in association with the proposed school.

6.7.2 Shooters Road is adopted public highway, the northern extent is currently private. Hunters Way is currently not adopted highway.

- 6.7.3 Existing accesses comprise standard priority junctions with minimal capacity improvements. Mini / midi roundabouts are located at the junctions of Lavender Hill with The Ridgeway and Holtwhite's Hill respectively.
- 6.7.4 The Public Transport Accessibility Level (PTAL) of the site ranges between 2 (poor) and 3 (moderate) from inner to peripheral areas respectively. The development is within a 10 minute walk from Gordon Hill Mainline Railway Station servicing the Hertford North and Liverpool Street line.
- 6.7.5 The Ridgeway and Lavender Hill are existing well trafficked routes with Annual Average Daily Traffic (AADT_ flows of approx. 22,000 vehicles and 12,000 vehicles respectively.
- 6.7.6 The Site lies immediately outside, but directly abuts, the Controlled Parking Zones of Chase Farm and Gordon Hill (each with different hours of control). On-street parking currently takes place across the site on off-street parking areas and private roads. The Trust has enacted a revised parking regime which has achieved some reduction in parking levels.
- 6.7.7 On-street parking surveys (provided as part of the application) suggest overall occupancy is moderate – however the surveys did not consider the overnight parking level, nor included The Ridgeway, Lavender Hill, Holtwhite's Hill (part), Hadley Road etc.

Proposal

- 6.7.8 As part of the submission, the following transport measures are proposed:
- The main access at The Ridgeway is proposed to be enhanced, including provision for right-turning (inbound) movements.
 - Hospital parking is proposed to be reduced to 900 from the current 1,444 across the site, involving the extension of the existing multi-storey car park to the north-west of the site.
 - School parking is proposed at 35-40 spaces.
 - Residential parking is proposed at a ratio of 1:1.
 - New pedestrian crossing to Lavender Hill

Assessment Process

- 6.7.9 Pre-application discussions were held between the Applicant and Council. The discussions covered the overarching access considerations for the three main land uses proposed for the site.
- 6.7.10 The Applicant has provided an initial Transport Assessment with associated Travel Plans (for Hospital, Residential and Primary School uses), Framework Construction Management Plan and accompanying drawings. These formed the basis of the first review by colleagues in Traffic and Transportation. The review raised a number of matters requiring additional clarification which were relayed Applicant for consideration. These included:
- Parking provision (Hospital, Residential and School);
 - Potential for Car Club provision;
 - Extension of Controlled Parking Zones;

- Reassessment of access points;
- Circulation route between Lavender Hill and Hunters Way / The Ridgeway;
- Review access and servicing arrangements for the interim school provision;
- Reassessment of trip generation modelling based of real wlrld examples and additional on-street surveys;
- Revised junction modelling;
- Travel plans;
- Review of pedestrian and Cyclist provision.

6.7.11 In addition, the points raised at planning panel and in review of the consultation responses received, further fed into the review of the Transport Assessment, with particular emphasis on the potential impacts for existing residents in the vicinity of the site including to Shooters Road, Comreddy Close and Ridge Crest. Accordingly a revised Transport Assessment with relevant addendum has been submitted and has resulted in the following changes to the proposed transport measures as follows:

- Re-routing of interim and permanent school access via Hunters Way with one way exit via Shooters Road including provision of new connecting road and control measures.
- Transport Assessment Response to LBE (09/02/15)
- Transport Assessment Response to Public Consultation (09/02/15)
- Framework Design Code

Traffic Generation

6.7.12 In the assessment of developments, Local Authorities must have due regard to the potential impacts of increased traffic generation to the locality and surrounding streets. Typically analysis of this nature would focus around access points to and from the site and relevant vehicle movements derived from car parking provision and servicing demands. In relation to servicing, the full extent of trip generation has not yet been identified, however, with sufficient control the proposed loading bay would be sufficient to ensure that the safety and free flow of traffic is not compromised as a result of the scheme.

6.7.13 The Applicant's initial submission presented a 'worst-case' assessment of trip generation in order to present a robust assessment to test the access proposals. As agreed with Traffic and Transportation colleagues, this assumed the following:

- Hospital – trip generation based on its current level of operation (i.e. the existing flows whilst occupying a smaller proportion of the site);
- Residential – 500 proposed units;
- Primary School – 3 Form Entry generating 630 pupils and 60 staff.

6.7.14 Following a meeting with the Council and the transport consultant, it was agreed that a 'real-world' assessment of trip generation would be more suited for the application. This resulted in the following assessment assumptions:

- Hospital – no change to the assessment above;

- Residential – net increase in residential units (i.e. 380), rather than the overestimate above;
- Primary School – 3 Form Entry generating 630 pupils and 60 staff, with modal splits drawing from existing sites within the Borough.

Hospital

6.7.15 Trip generation data for the hospital has remained unchanged in the assessment of the current application. In consultation with colleagues in Traffic and Transportation, they are satisfied that the degree of trip generation would not alter as it would represent a continuation of trips already active on the network. It is also noted that the hospital has already taken steps to manage and reduce its vehicular operations – both in terms of number of vehicles and parking provision – and this is generally supported and will when fully implemented further reduce the number of frequency of trips.

Residential

6.7.16 The initial residential trip generation assessment used data from the TRAVL database. It is noted that the (London-centric) TRAVL database has recently been subsumed in to the national TRICS trip generation database. The Applicant's initial submission referenced one survey site in Kew, which was undertaken in 2006. The data for the Kew Riverside development (Affordable and Private) included 550 units and 690 parking spaces at a ratio of approximately 1.25 spaces per unit.

6.7.17 Whilst this was selected based on its level of access to public transport (comparable to the Chase Farm site) and associated characteristics, it was not considered suitably robust given the age of survey data and the sensitivity of the Chase Farm site.

6.7.18 Following negotiations with the applicant and mindful of the comments made at planning panel the Applicant undertook detailed arrival / departure surveys at the nearby (and recent) residential development at Drapers Road. This change has allowed a more relevant – and therefore more robust, in line with best practice – assessment of residential vehicle trips in the vicinity of the site.

6.7.19 The Drapers Road development comprises 48 units with a total of 56 associated parking spaces. The survey recorded multi-modal trips in and out of the development between 07:00-10:00 & 16:00-19:00 on a neutral weekday (21/01/2015). Mode split data was based on local Ward-level Census data. In terms of trip generation, it was clear that the 'real world' local residential trip characteristics are much less pronounced than initially identified, with the morning period recording a notably lower level of vehicle movements overall. Notwithstanding the obvious reliability of the results, it was considered that the degree of traffic generation for the residential element of the scheme is within acceptable thresholds.

Primary School

6.7.20 The trip generation assessment for school related vehicle movements drew from mode split data occurring at schools within Enfield and with similar level of public transport accessibility. At pre-application, it was agreed that the results for the John Keats Primary School would be used – in relation to other

schools in the Borough this included a relatively high proportion of car based trips, at 30%, to provide a more robust assessment. In conjunction with the revisions to the trip generation, and the assertion that the Primary School is expected to draw 2 of the 3 form entry from the immediate catchment by non-car modes), a revised mode split was used, drawing from the Bowes Primary School. This generated a much lower degree of car based trips to 17% overall. In consultation with Traffic and Transportation, this was considered realistic and acceptable in relation to the surrounding highway network.

Junction Modelling

- 6.7.21 Detailed traffic surveys were undertaken in June 2014 and again in January 2015 following meeting with Officers. This approach has demonstrated that the surveyed traffic levels in the area are consistent, hence considered acceptable as a basis for assessment. A total of six junctions were modelled and the later surveys were configured specifically to survey the school drop off / pick up periods.
- 6.7.22 Following revisions, the anticipated measures of traffic flow at these junctions are typically less than 85%. Junction performance at or below this threshold is considered acceptable in accordance with ref: TA23/81 of the Design Manual for Roads and Bridges. The Ridgeway (south) arm of the junction with Lavender Hill records a marginal elevation to 0.87 which again is not considered detrimental particularly where the junction proposals involve Priority Junctions (similar to existing) with ghost island markings on The Ridgeway to manage the potential risk of queuing.
- 6.7.23 In addition, following feedback from local residents expressing concern relating to the principal access to the school site via Shooters Road, the proposed operation of Shooters Road (north) was reversed – i.e. school related vehicles would exit (not enter) via Shooters Road. This requires the effective circulation of vehicles to enter via Hunters Way and exit via Shooters Road in order to minimise the potential impact on residents. The revised modelling for the Hunters Way junction (the key component in this assessment) is based on all school traffic using this circulation. The findings of the revised modelling demonstrates that the ‘clockwise’ circulation from Hunters Way to Shooters Road is feasible in the context of the full development traffic and in responding to residents’ concerns would reduce the impact of the development from a traffic generation perspective significantly.
- 6.7.24 An alternative access proposal was also considered for the main access from The Ridgeway, again following feedback from local residents. This explored the possible provision of a mini-roundabout serving a revised main access point to the site, Ridge Crest and The Ridgeway. Revised modelling, shows that the installation of a mini / midi-roundabout would push the junction significantly beyond the recommended threshold of 0.85 to between 0.99 and 1.15. These results demonstrate that the roundabout proposal is not viable for the location as it introduces significant delay to the network and would be detrimental to users of Ridge Crest in entering/exiting the road.

Access Proposals

- 6.7.25 Policy DMD47 of the Development Management Document seeks to ensure that all new residential developments are adequately accessed and serviced

for the delivery of goods, loading / unloading, refuse collection, emergency vehicles, and where site circumstances, demand drop off / pick up areas. In relation to the subject outline application 'Access' is the only matter not to be reserved.

- 6.7.26 The main access points are proposed as The Ridgeway (with reconfigured layout), Hunters Way and Shooters Road. Initially, Shooters Road was proposed to operate one-way northbound from the northern extent of Shooters Road (by Comreddy Close) to manage school related traffic. As stated above, following on from the concerns of residents, this has since changed to operate in southbound direction to reduce the risk of excess parking and congestion.
- 6.7.27 The Applicant has offered the proposed streets, excluding dedicated internal hospital accesses, for adoption as highway maintainable at public expense. This will also enable Council enforcement to take place. This assists in managing the safe operation of the roads, and associated parking by ensuring that all layouts, geometries and materials to be to adoptable standards.
- 6.7.28 For the purposes of clarity each of the accesses will be assessed in the following sections:

The Ridgeway

- 6.7.29 Proposals for the main access to the site via The Ridgeway considered a range of options. Consultation with the representatives for Ridge Crest revealed their cautious support for the current configuration as the carriageway width results in vehicles entering the site occasionally having to queue. It was held by residents that this arrangement results in gaps that enable the residents of Ridge Crest to exit to The Ridgeway. In this regard, objectors considered that more conventional junction enhancements could reduce this opportunity for safe egress.
- 6.7.30 As noted above, the applicant responded to this by considering the possible introduction of a roundabout to provide access to the site and therefore benefit traffic accessing Ridge Crest. However, this was not considered suitable owing to the significant impacts on traffic at this location.
- 6.7.31 As an alternative, the Applicant has prepared an outline junction configuration which relocates the hospital access further north to a location opposite Ridge Crest. It is considered that this configuration recognises the spatial constraints presented by the retained Lodge building (affecting the current access location) and enables the junction to be widened to accommodate a ghost island with space for turning vehicles to wait without blocking traffic flows on The Ridgeway. It also enables the provision of informal pedestrian crossing points across The Ridgeway (another point raised by residents at planning panel). The layout has been modelled and is considered acceptable in traffic terms.
- 6.7.32 Subsequent discussions between the Council and the applicant's consultant have established the need for additional measures in support of vulnerable road users' safety and amenity. This will include pedestrian refuges and connections to the wider cycle network. The pedestrian enhancements whilst enhancing connectivity to / from the site will also offer the opportunity for

traffic gaps to assist users of Ridge Crest in exiting to The Ridgeway and will be secured by s106.

- 6.7.33 Recent discussions with the Applicant have also established support for enhancements to the junction of The Ridgeway with Lavender Hill / Farorna Walk. This location has a history of some road traffic incidents in addition to an existing roundabout layout that would benefit from some improvement. The applicant's transport consultant has confirmed agreement in principle to these measures albeit where the specific detail will be negotiated through the s106.

Hunters Way

- 6.7.34 The junction of Hunters Way with Lavender Hill is proposed to provide two-way access to / from the development site. Hunters Way itself will be adopted as highway maintainable at public expense and will be enforceable to maintain compliance with parking and traffic operations.
- 6.7.35 As stated in the previous section, the junction modelling has demonstrated that the implications of the development and indeed the decision to route school traffic through the junction is acceptable. While the junction is to be largely retained as existing, moderate works are suggested at key junctions including The Ridgeway / Lavender Hill to support the scheme.

Shooters Road

- 6.7.36 The Shooters Road junction with Lavender Hill will remain as a priority junction although the northern extent is proposed to be opened up to cater for exiting school traffic. It is noted that the Shooters Road environment also serves the allotments to the north east of Shooters Road, and accommodates major Statutory Undertakers apparatus including a foul pumping station.
- 6.7.37 The overall approach for an internal one-way circulation of school traffic between the Hunters Way and Shooters Road is noted, and follows extensive discussions with the Council. The one-way southbound operation of Shooters Road is proposed to connect to the internal road layout, providing an additional (one-way) loop.
- 6.7.38 School traffic will circulate in a clockwise direction from Hunters Way. The interim school will utilise an allocated parking and drop-off / pick-up area to the main school site and pupils will be escorted between the drop-off and interim school site. The permanent school would operate in a similar fashion, with drop-off / pick-up and staff parking operating within a single site demise. The Shooters Road extension will not form part of the resulting adopted public highway network so that access can be more rigorously controlled to prevent ad hoc parking or congestion to Shooters Road. This is considered to be a preferable option for residents and pupils utilising the site ensuring any disruption at peak times is minimised and parents / staff clearly directed through the site.

Public Transport

- 6.7.39 There are two existing bus stops within a short walking distance of the development site along Hunters Way and in the existing hospital road network

servicing the W9, W8 and 313 routes. The site is approximately 800 metres from Gordon Hill rail station, which has numerous national rail services.

- 6.7.40 Through pre-application negotiations an enhanced bus stand and principal bus route has been agreed for the site. Transport for London have been consulted as part of the final submission and have made the following comments:

'TfL requires that these bus shelters are upgraded to TfL's Landmark London Model and ensure they comply with Accessible Bus Stop guidance. In addition to this, a new bus stand to replace the one to be included in the redevelopment should be provided with a minimum stacking capacity for three buses. A stop post should also be provided for this facility in conjunction with a drivers' toilet to specification of which should be agreed with TfL. A financial contribution of £30,000 is required for these works (except for the drivers' toilets) to be completed and should be included in the 'heads of terms' of the S106 agreement.

It is noted that a drivers facility is proposed in the form of the hospital's restroom facilities. TfL will need to review this proposal and confirm whether it is acceptable.

TfL has concluded that the existing bus services have sufficient capacity to accommodate additional demand.

The S106 agreement should ensure that there are appropriate lease arrangements in place to provide access rights for buses and safeguard the stand in the event that any or all of the roads to be used by buses are not adopted. TfL will provide further clarification in this regard.'

- 6.7.41 Officers concur with these stipulations and will ensure relevant s106 contributions and requirements are secured. However it is noted that the Applicant have subsequently advised they have reached agreement that the drivers will be able to use existing hospital toilet facilities rather than requiring dedicated provision.

Parking

Hospital

- 6.7.42 A total of 1,444 spaces are currently present across the site. However, it should be noted that 254 of these spaces are part of the Mental Health Trust and the Kings Oak Private Hospital; these sites do not form part of this application and are not subject to a reduction in parking.

- 6.7.43 Accordingly, as part of this application, hospital parking currently stands at 1,190 spaces and as a result of the redevelopment is planned, that with increased enforcement, formalised parking to the site will be reduced to 900 spaces resulting in an overall loss of 290 spaces across the hospital site. Parking will be primarily focused on the existing multi-storey car park which will be extended as part of the proposal. It is noted that Transport for London initially objected to the scheme on the basis of an over provision of parking to serve the hospital use. Through discussions with the applicant, it was

established that their concern was derived from the additional 254 spaces allocated to the Mental Health Trust and Kings Oak Private Hospital, both of which are outside of the control of the Royal Free NHS Foundation Trust. In this regard, TfL have withdrawn their objection.

6.7.44 The hospital has also introduced management measures, presented in the application, that seek to reduce reliance on private car, including the incidence of staff parking at the site to travel on hospital transport to other hospital sites. In consultation with colleagues in Traffic and Transportation, this is considered positive, but will need to be secured via s106 and rigorously managed through the resulting Hospital Travel plan (HTP).

6.7.45 In support of their submission, the Applicant undertook additional parking surveys in January 2015 (following enhanced enforcement measures to reduce ad hoc and illegal parking practices and have found that occupancy rates have fallen to 892 vehicles in total (this is a further 298 fewer than a survey in June 2014, before measures were adopted), which given the comparability in operation of the existing and proposed hospital would add weight to a claim that indicates 900 parking spaces would accommodate the hospital campus demand. This supports the hospital's management proposals and is now accepted by TfL.

Residential

6.7.46 The Transport Assessment indicates that the parking ratio of spaces to units is 1:1, with up to 500 spaces being provided for up to 500 homes. Policy 6.13 and associated Table 6.2 of the London Plan sets out maximum parking standards for developments in London. Parking provision is determined by, amongst other factors, the accessibility of the site and the number of beds per dwelling. The subject site has a Public Transport Accessibility Level (PTAL) that ranges from 2 (low accessibility) to 3 (moderate accessibility) although it must be noted that such changes occur over a small geographic area. In this regard, as a whole the site can be considered as of moderate accessibility.

6.7.47 The maximum standards as taken from the London Plan advise that less than 1 space should be provided for 1-2 bed units, 1.5-1 spaces for 3 bed units, and 1.5-2 spaces for 4+ bed units. It also advises that electric charge points should be provided at the rate of 20% active units (those provided with the plant required to facilitate charging) and 20% passive (those provided with the infrastructure to facilitate future charging point). The subject scheme is outline, and the mix is illustrative and hence the exact parking provision is unknown, however, in consultation with Traffic and Transportation and TfL, it is concluded that such provision would be acceptable and would respond to the vehicular demands generated by the residential element of the scheme.

6.7.48 Representations made at the Planning Panel and through the consultation process has expressed concerns over the degree of parking allocated to the residential units, with specific concern relating to the degree of car ownership for the larger family sized units. These comments have been noted, however, notwithstanding the fact that the expressed ratio would be compliant with London Plan Policy 6.13, a series of measures to encourage sustainable transport modes, enlarge the surrounding Controlled Parking Zones and the provision of a potential car club option is such that the demand for parking will be minimised so far as is practicable.

School

6.7.49 The submitted, parking provision for 35-40 vehicles is proposed to service the school site. It is noted that this level of provision has been questioned by TfL citing that levels would appear too high. Accordingly the applicant has been charged with providing evidence to support this requirement. In response, the applicant has claimed that the proposed parking provision for the Primary School has been established from a review of existing parking levels at a number of schools within the Borough.

6.7.50 The assessment considered the respective parking ratios based on the level of parking, student numbers and staff numbers from the following School Travel Plans:

- Brettenham;
- Carterhatch;
- Churchfield;
- Eversley;
- Bowes; and
- Vita Et Pax.

6.7.51 The assessment of pupil / staff numbers verses existing parking provision at the schools generates the following ranges (in bold):

School	PTAL	Parking	Staff	Pupils	Spaces / Staff	New 3FE Parking (based on 630 Pupils)	New 3FE Parking (based on 90 Staff)
Brettenham	5	30	79	479	0.4	39	34
Carterhatch	2	37	60	390	0.6	60	56
Churchfield	2	24	109	657	0.2	23	20
Eversley	1b	26	65	570	0.4	29	36
Bowes	4	0	74	536	0.0	0	0
Vita Et Pax	2	6	28	204	0.2	19	19

6.7.52 It should be noted that the ranges of parking provision relate to site-specific conditions in addition to active School Travel Plans each of which are at different stages of implementation. This analysis sought to establish the range of parking numbers in operation across each site.

6.7.53 From the information submitted, it can be seen that the results for Carterhatch Primary and Churchfield Primary (each with PTAL 2) record the most relevant upper and lower parking numbers usable for the Chase Farm site and in this regard the proposed parking provision for the school lies within the lower part of the range.

6.7.54 In consultation with Traffic and Transportation, it is considered that the level of provision is justified based on substantive evidence derived from similar sites within the Borough and will further be refined through the reserved matters stage will be refined.

Car Club Provision

6.7.55 As originally submitted, the development proposal did not seek to provide car club provision or membership. However, on the basis of consultation

responses including those from TfL, the applicant was encouraged to approach service providers for inclusion within the scheme. Initially providers were reluctant to provide facilities at this location, with Zipcar only offering reduced price membership rather than on site provision. This option was discounted due to the fact that the nearest Zipcar vehicles were located closer to Enfield Town and were not considered accessible for the Chase Farm development.

6.7.56 Unabated, City Car Club have subsequently have come forward as an operator willing to provide vehicles with discounted membership costs. It is considered that this is encouraging and will provide a sound basis for supporting the respective hospital, residential and school travel plans with approx. 3 spaces initially provided across the site. It will also prime the location for potential enhanced provision as Zipcar may still get involved with the site. While negotiations are ongoing this will be likely be secured by s106 agreement.

Existing Residents' Parking

6.7.57 The Site directly abuts the Gordon Hill and Chase Farm CPZs each with differing hours of control. The applicant has offered the roads for adoption, but this will also require an extension of the CPZ(s).

6.7.58 As the CPZs operate with different times the specific proposals will need to be refined further – resident involvement will also be necessary given the resulting potential changes to hours of operation. Given the addition of a school to the site, it may be necessary to extend the CPZ controls further to the south – the Council will retain a watching brief on this aspect, and a contribution to future CPZ consultation would be secured by planning obligation.

6.7.59 It is considered appropriate that the 'new' streets coming forward as part of the proposed development (with the exception of the dedicated internal hospital roads) will be adopted and will form part of an extended (existing) Chase Farm Controlled Parking Zone.

6.7.60 It is further proposed that the Shooters Road / Comreddy Close area will be reconfigured in to a sub-zone of the Gordon Hill CPZ. The hours of control would change to better reflect school hours whilst still providing adequate protection against commuter parking. It should be noted that this minor modification is not expected to change the existing permit costs for the residents of this location.

6.7.61 Enhanced Parking Attendant enforcement will be secured through planning obligations to manage the Chase Farm and Gordon Hill CPZs.

6.7.62 Future considerations, as part of the Council's watching brief may include the introduction of a Prohibition Order on Shooters Road to enforce against non-permitted (i.e. non-resident) vehicles accessing the location within controlled hours to ensure vehicular traffic associated with the school is carefully controlled to minimise potential impacts.

General

6.7.63 Whilst few specific layout details have been provided, parking spaces will have to comply with current guidance on dimensions, accessibility, layout etc. and will be dealt with by condition and at reserved matters stage.

6.7.64 Car parking management plans will also be required and the applicant has provided sample / draft versions as part of the application – the formal versions will be secured by condition / obligation.

Walking & Cycling

6.7.65 The Applicant has undertaken PERS and CERS audits as part of the submission. Given the feedback received from local stakeholders, the Council's Cycle Enfield programme and the mix of uses across the site there are clear benefits to be gained in enhancing the site's connectivity with the planned Greenway improvements to the west of the site (2017-18) and east of the site (2015-16).

6.7.66 The opportunities to enhance general pedestrian and cycle connectivity to the site (including at The Ridgeway) have been raised with the Applicant and will be secured via s106 obligation.

Travel Plans

6.7.67 Travel Plans will be required for each of the prospective uses across the site and will be secured via s106 agreement. Traffic and Transportation note that a dedicated Travel Plan Coordinator (TPC) would function most effectively if charged with all of the sites although it is recognised that the proposed phasing may not make this achievable. It is also likely that the hospital and school TPC functions would be covered by staff members within the respective organisations. Close collaboration will therefore be required between the respective TPCs. This would also support the introduction of car club cars and bays on site, in conjunction with the offered memberships.

Delivery & Service Plans

6.7.68 Draft Delivery & Service Plans have been provided with the application for the Hospital and School uses. These are currently being reviewed in more detail, with the parking management plan and Travel Plans, but the overall approach is positive. These will all be secured by condition and / or through the s106 agreement.

Construction Traffic Management

6.7.69 Construction Traffic Management will be necessary given the proposed phasing plans and provision of the temporary school.

6.7.70 The draft document has been provided by the Applicant which is welcomed. If approval is granted, a full Construction Management Plan will be necessary through the course of all construction phases and will be secured through the s106 agreement.

6.8 Sustainable Design and Construction

Energy

- 6.8.1 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 35% over Part L of Building Regulations 2013 across the site.¹
- 6.8.2 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 the Borough.
- 6.8.3 An Energy Statement has been submitted. There are three elements to the project, the hospital, school and residential units. Due to the fact that the application is outline with all matters reserved, it is not possible to calculate expected energy use in detail, but the statement has adopted an approach based on comparisons with other similar projects has been used. In each case a building of the same end use has been chosen that meets the requirements of Part L 2013. From this the expected energy use and carbon emissions have been estimated on the basis of the floor areas of the proposed buildings. This gives a reasonable approximation of the energy use and hence carbon emissions in each case, and allows an initial analysis of options for CHP and renewable energy to be carried out. It must be made clear to members that this analysis is necessarily approximate at this stage. However, by way of a summary the respective components of the energy strategy are set out below:

Fabric Energy Efficiency (Be Lean)

- 6.8.4 A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by Building Regulations. Other features include low energy passive ventilation measures (mechanical ventilation with heat recovery or MVHR systems will be installed where cross ventilation cannot be achieved), high efficiency lighting enhanced u-values significantly beyond stated Building Regulations default maximum values, as well as enhanced construction detailing to tackle thermal bridging. The demand for cooling will be minimised so far as practicable with a number of passive design measures to facilitate ventilation and appropriate landscaping, however, the nature of occupation of the hospital use preclude a fully passive approach and hence energy efficient mechanical cooling systems will need to be specified. On a notional basis, these measures alone result exceed a baseline case of compliance with Part L 2013, through energy efficient measure alone. This is consistent with a 'Fabric First' approach.

¹ In accordance with London Plan updated 'Energy Planning - GLA Guidance on preparing energy assessments' amendments to Part L of Building Regulations 2013 have been integrated into stated targets to reflect Fabric Energy Efficiency Standards and amendment to the Standard Assessment Procedure 2012. In this regard, a 35% improvement over Part L1A 2013 is also a permissible target.

Combined Heat and Power / Decentralised Energy Network (Be Clean)

- 6.8.5 The site has been cross-referenced with data stored by the London Heat Map with all relevant layers activated. It is understood that there are no existing or planned CCHP/CHP distribution networks local to the site. However, at pre-application stage it was determined that the development would achieve the critical mass to support a community heat network to the site. As a result of further feasibility testing through the application process, the aspiration for this network has narrowed slightly and in accordance with the Energy Strategy Addendum (submitted 27/02/15) it was concluded that due to both lower heat demand and substantial additional network length, it was decided that a CHP connection to the terraced houses and apartments to the south of the development would be financially unviable. However, connection to apartment blocks located to the north of the site and adjacent to the main hospital block was determined to be suitable for future connection.
- 6.8.6 In this regard, a proposed energy centre would be located to the north-west of the site and sized to the region of 1,250 sq.m in order to have adequate capacity for site wide heat provision. The energy centre will include a Combined Heat a Power system (CHP), top-up boilers and associated plant. Sufficient additional space has been provided to allow the modular expansion of energy centre plant as the identified apartments block come on line. While the exact strategy and relevant output of this installation has been omitted as part of the addendum, it is considered on balance that the provision of even a stripped back version of the heat network would be of substantial benefit to the scheme and compliant with the provisions of London Plan Policy 3.5 and DMD52 of the Development Management Document. Measures to facilitate the network, including relevant feasibility testing will be secured by way of s106 agreement. The GLA have also been consulted on this amended strategy and are supportive in principle of the change.

Renewable Energy Technologies

- 6.8.7 The feasibility of the renewable energy technologies listed in the London Plan has been considered and the amended Energy Strategy indicates that photovoltaic arrays are the most likely technology to make up any identified shortfall in stated targets and in the case of the terraced units and primary school will be of critical importance.
- 6.8.8 The photovoltaic array required to satisfy notional models used in the strategy would see the installation of a pv array of 4,090 sq.m, with an output of 614 kWP spread over the development and would result in a further 12.7% reduction in CO2 emissions from the complaint baseline. This is consistent with DMD53 and London Plan Policy 5.7.

Summary

- 6.8.9 On the basis of the energy strategy submitted with relevant revisions a 35% carbon reduction is achieved over a Part L 2013 compliant baseline. This is consistent with the requirements of Policy DMD51 and London Plan Policy 5.2.

Code for Sustainable Homes/BREEAM

6.8.10 Core Policy 4 of the adopted Core Strategy requires that all residential developments should seek to exceed Code Level 3 of the Code for Sustainable Homes. DMD50 of the Development Management Document has updated this target and new residential developments within the Borough are now required to exceed a Code Level 4 rating. In relation to the hospital and school sites, DMD50 expands this requirements and dictates that non-residential development a BREEAM New Construction rating of 'Excellent' from 2016. In this regard, all developments are be required to submit a full and detailed pre-assessment report at planning application stage (RIBA Stages C & D) as well as formal certification of credentials under the Code for Sustainable Homes secured by way of a condition in the following formats and at the following times:

1. a design stage assessment, conducted by an accredited Assessor and supported by relevant BRE interim certificate, shall be submitted at pre-construction stage prior to the commencement of superstructure works on site; and,
2. a post construction assessment, conducted by and accredited and supported by relevant BRE accreditation certificate, shall be submitted following the practical completion of the development and prior to the first occupation.

6.8.11 A pre-assessment has been submitted with the application and this indicates that all of the residential units would achieve a Code Level 4 rating under the CfSH and a BREEAM New Construction rating of 'Excellent' for the hospital by an adequate margin and featured all assumptions (in the absence of detailed specification), are reasonable and achievable. This can be conditioned subject to appropriate trigger for the submission of certification. Details in relation to the school have been omitted, however, relevant feasibility testing to achieve an excellent rating can be built into any condition levied. This is consistent with Strategic Objective 2 and Policy CP4 of the Core Strategy, DMD50 of the Development Management Document and Policies 5.1 and 5.2 of the London Plan.

Green Roofs

6.8.12 Policy DMD55 of the Development Management Document seeks to ensure that new-build developments, and all major development will be required to use all available roof space and vertical surfaces for the installation of low zero carbon technologies, green roofs, and living walls subject to technical and economic feasibility and other relevant planning considerations. Following on from pre-application advice, the development will be required to utilise vacant roof space for the cultivation of living roofs and in the case of the multi-storey car park the creation of a living wall to soften the appearance of the existing and proposed structure.

6.8.13 While it is acknowledged that it is likely that there will be demand for roof space as a result of the indicative energy strategy. However, the technologies are not mutually exclusive and hence to accord with the provisions of DMD55 the feasibility of providing Green Roofs to the development will be secured via condition. The applicant is advised that the Council will seek provision of extensive green roofs (sedum roofs as will not be appropriate) are required to have a substrate depth of 75-150mm, unless it can be demonstrated that this is not reasonably possible or conflicts with the renewables strategy. In this case an alternative green roof specification will

be sought. The substrate depth should be varied within this range to maximise biodiversity benefits in accordance with the Biodiversity Action Plan (BAP).

Biodiversity

- 6.8.14 The applicant has submitted an ecological appraisal of the proposed development based on surveys undertaken across the development site. The report concludes that the site currently has potential for nesting birds, foraging bats and badgers, hedgehogs, common reptiles and amphibians. Additional bat surveys have shown that bats are roosting and foraging on site with 5 species of bat recorded on site foraging or commuting. In addition eight pipistrelle summer roosts were found within buildings on site which will be demolished to accommodate the redevelopment. Further details on the findings, the impacts and the proposed mitigation in relation to bats can be found within Darwin Ecology's Bat Survey Report November 2014.
- 6.8.15 In light of this a comprehensive suite of worst case mitigation measures in relation to each of the protected species that could be present has been provided. These demonstrate that should they be present the favourable conservation status of each of the species should be maintained post development and that adequate mitigation / compensation could be provided within the parameters of this outline scheme. In summary the mitigation strategy is as follows:

Bats

- Toolbox talks to be provided to site contractors prior to construction starting on site. These talks will cover all protected species which could potentially be encountered and will provide information on legal protection afforded to species, how to identify and where species could occur and what to do if the species is encountered.
- Ecological supervision prior to demolition of buildings known to support roosting bats or with significant potential to support roosting bats.
- Compensatory roosts will be provided on retained trees and within new and retained buildings on site.
- Bat sensitive lighting will be required across the site to ensure that dark areas of habitat are provided and to ensure that roosting and foraging and commuting routes are not subject to excessive light spillage.
- Enhancements of landscaped areas to provide improved foraging habitat for local wildlife including bats. Improvements to connectivity of habitats both on and close to the site where possible will be incorporated into the design.

Reptiles

- Construction Phase Impacts and Mitigation: Whilst reptiles are extremely unlikely to be encountered during construction, given the reptile survey results, measures that are required for other species will also ensure that in the unlikely event that a small number of individual reptiles are encountered that they are not harmed during the construction phase. Reptiles will be covered in the pre-construction phase toolbox talks. Clearance of woodland, hedgerows, rubble piles and scrub will be undertaken under ecological supervision by a suitably qualified ecologist.

Where habitat contains possible hibernation features clearance will be undertaken during reptile active season (generally March-October dependent of weather conditions). If any reptiles are found then they will be removed from danger and placed in suitable retained habitat away from construction activity.

- Post Development Impacts and Mitigations: Given the reptile survey results it is highly unlikely that reptiles will be impacted post development by these proposals. However, the redevelopment of the site offers opportunities for enhancing the site for local wildlife including reptiles. Whilst it is unlikely that reptiles are present on site they are likely to be present in the wider area and as such if new habitat which is suitable to reptiles is created on site then this may be colonised by local reptiles. The creation of rougher grassland and scrub habitats interconnected by hedgerows is recommended to provide suitable habitat for these species. The creation of log/habitat piles which could be used by reptiles as refugia and potential hibernacula, features which are rare on site currently.

Birds

- Construction Phase Impacts and Mitigation: All vegetation clearance should be undertaken outside the bird nesting season (March to September inclusive for most species in the UK). All occupied bird nests have legal protection from damage and destruction under the Wildlife and Countryside Act (1981). If vegetation clearance must be undertaken during the nesting season, all vegetation should first be subject to a nesting bird survey by a qualified ecologist. If nests are found then works must stop in the area and a buffer set up around the nest, suitable in size for the species, until all chicks have fledged the nest.
- The legal protection afforded to breeding birds and best practice working methodology will be covered in pre-construction toolbox talks to construction workers.
- Post Development Phase Impacts and Mitigation: There may be a temporary loss of nesting and foraging opportunities on site with areas of suitable habitat lost. New nesting opportunities will be provided in the form of woodcrete nesting boxes. These boxes will be installed on retained trees and if necessary retained and new buildings close to areas of suitable foraging habitat. It is recommended that the bird boxes included are suitable for a range of species that are likely to be encountered on site such as the Schweglers 1B box for a range of tits, the Schwegler sparrow terrance 1SP and the Schwegler 1N for robins and wrens.

Amphibians

- Construction Phase Impacts and Mitigation: Amphibians will be covered within the preconstruction toolbox talk. As site clearance of the areas of suitable habitat will be undertaken under ecological supervision the risk to individual amphibians is greatly reduced. All trenches and holes should be filled or covered overnight to prevent amphibians falling in and becoming trapped.
- Post Development Impacts and Mitigation: Given the low potential for amphibians to be present on site and the small area of suitable terrestrial habitat it is highly unlikely that the redevelopment of the site will have a

significant impact on the local amphibian population. However, creation of new habitat including provision of log piles and hibernacula will enhance the site for amphibians by providing habitat features which are not currently present on site.

Badgers

- Construction Phase Impacts and Mitigation: As the site may be accessed on occasion by badgers it is possible that without mitigation in place that they may be harmed during the construction phase. All construction workers will be subject to a toolbox talk prior to any construction works starting to ensure that workers are aware of the potential for protected species including badgers, to be present and measures to ensure no animals are harmed. All trenches and holes must be covered or filled in overnight to prevent badgers or other animals becoming trapped.
- Post Development Impacts and Mitigation: The loss of habitat on site which may be occasionally used by badgers is unlikely to have a significant impact on the foraging success for local badgers. However, the scheme has potential to provide suitable foraging habitat with the provision of grassland and berry bearing hedgerow and tree species which will provide potential foraging opportunities for badgers. To allow badgers access to these new habitats it will be necessary to ensure that the boundary treatment of these areas will allow badgers access. This can be achieved through the use of hedgerows instead of fencing or use of fencing which is slightly raised to allow access to mammals. It is not anticipated that the development will have any long term significant impacts on the local badger population.

Summary

- 6.8.16 The applicant has provided the council with sufficient information to enable the Authority to determine that with appropriate mitigation provided, the proposals are unlikely to have an adverse impact on protected species and have demonstrated that such mitigation even in a 'worse case' scenario can be provided within the context of this outline scheme. They have also demonstrated how the proposed development complies with planning policy, wildlife legislation (in particular The Habitat Regulations) and recent case law in relation to European protected species. As such, subject to conditions there should be no objections to the proposals

Flood Risk/Sustainable Urban Drainage

- 6.8.17 The subject site is not within a Flood Zone but is at risk from surface water flooding. A Flood Risk Assessment and Sustainable Drainage Strategy has been submitted. In consultation with the Environment Agency, they raise no objections in principle to the scheme, but highlight that there is currently no justification to support the fact that the development would fail to achieve Greenfield run-off rates as required by Policies DMD 59, 60, 61 and 62. In this regard, and mindful of the outline nature of the scheme, it is considered that this can be addressed through condition.

Pollution & Air Quality

6.8.18 During the construction phase of the proposed development, construction activities such as demolition, earthworks, construction and track-out activities have the potential to affect local air quality. These impacts are mainly associated with construction dusts and emissions to air from construction plant.

6.8.19 In consultation with Environmental Health no objections have been raised subject to relevant conditions the ensure that the recommendations in the report should be implemented to protect residents from air quality which exceeds the objective levels set out in the Air Quality Regulations 2002 and (amendment) Regulations 2002. This is considered acceptable.

Contaminated Land

6.8.20 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. A Geotechnical and Geoenvironmental Report has been submitted with the scheme. The study has identified the following possible sources of ground contamination on the site, including: electricity substations (former and current); storage tanks and drums (former and current); former clinical waste incineration; generators; hospital activities such as chemical and waste storages; waste treatment; garages; fuel station; asbestos, and; unknown fill in the Made Ground. Following consultation with Environmental Health, it is considered that relevant remediation works can be adequately controlled by condition.

Noise

6.8.21 An Acoustic Report has been submitted with the application. In consultation with Environmental Health the report was considered to be acceptable subject to conditions.

Landscaping

6.8.22 The illustrative landscaping Masterplan and accompanying Design and Access Statement sets key objectives for the delivery of high quality public realm that cultivates a safe and inclusive environment for residents and visitors while seeking to maximise the environmental contribution of the scheme.



Illustration 5: Indicative landscaping plan

6.8.23 Through considered design the applicant has sought to create such an environment for the development as a whole that would meaningfully contribute to these objectives, with features and planting that serves to soften the built form, create attractive spaces, but also performs a function that prioritises the pedestrian, calms traffic movements and attenuates surface water run-off through the use of Sustainable Urban Drainage Systems.

6.8.24 The central square serves to integrate the residential, school and hospital uses and provides the clear focus of the development, while well-designed shared surfaces to the main entrance to The Ridgeway create an attractive

gateway to the development. While it is noted that the landscaping strategy , it indicative, it is considered that the parameters set would create a defined sense of place and character areas will benefit from functional design, considered street furniture and is accompanied by a clear commitment on behalf of the applicant to source, incorporate sustainable drainage measures and plant rich biodiverse native species in any subsequent landscaping scheme. Measures to secure details of landscaping with will be secured by conditions and it is considered is consistent with Policies CP4, CP28, CP30, CP34 & CP36 of the Core Strategy, DMD81 of the Development Management Document and Policies 3.6, 5.10 and 7.19 of the London Plan.

Trees

- 6.8.25 An arboricultural report and tree survey has been submitted with the scheme. A number of established trees exist on the site , the vast majority of which are scheduled for retention. The Tree Officer has indicated that he has no objection in principle to the scheme, commenting that there are a number of significant and good quality trees on the site that positively contribute individually or as groups to the amenity and character of the site (including the proposed school site).
- 6.8.26 Following on from pre-application discussions, the overwhelming majority of these trees have been sensibly retained where they will continue to contribute to the proposed development. Subject to conditions an appropriate Tree Protection Plan will be required to protect the trees during demolition and development of the site.
- 6.8.27 The trees that are to be removed to facilitate development are all of either poor quality and / or low amenity value and in accordance with current arboricultural guidelines should not be considered a constraint to development providing suitable tree replacement planting is carried out as part of the landscape scheme. The indicative landscape plan does include significant tree planting and subject to detail will enhance the site and be appropriate for this development. Again this will be required through suitable conditions.
- 6.8.28 The only area of contention on the site with regard to trees is the removal of several large mature oak trees currently located in the large grass area at the rear of the main hospital. Although it would be extremely desirable to retain these significant trees it is recognised that this is area is required for the expansion of the hospital which would outweigh the disbenefits of their loss. Providing these trees are replaced by suitable semi-mature replacements as part of the landscape scheme and in consideration with the overall tree retention on the site, it is considered the removal of these trees is acceptable for the construction of a hospital.
- 6.8.29 Moreover, there are opportunities within the tree pit design to further benefit the long term health of the planted specimens as well as incorporating a SUDS system to manage and utilise surface water run-off in the urban environment and further make an important contribution to the development providing significant benefits and sustainability. The will also feature as a condition.

6.9 *S106 Contributions*

- 6.9.1 A Section 106 agreement will be required for the scheme, while the exact amount of contributions payable are yet to be agreed, the agreement will comprise the following Heads of Terms:

Hospital

- a. Hospital delivery
- b. Hospital continuity
- c. Future expansion
- d. Primary Care enabling

School

- e. Contribution to education / child services provision

Affordable Housing

- f. Onsite contribution / overage
- g. Phasing

Residential Units

- h. Mix
- i. Wheelchair units
- j. Child Playspace
- k. Public realm enhancements
- l. Restricted parking permits

Delivery

- m. Phasing Plan

Transport

- n. Road lining and signage
- o. Contributions towards Controlled Parking Zone
- p. Pedestrian Crossing (Lavender Hill)
- q. Entering into s278 for off-site highways work
- r. Adoption of roads
- s. Car club
- t. Travel Plans for each of the land uses
- u. Sustainable travel promotions
- v. PERS / CERS Audit
- w. Temporary arrangements for TfL bus routes
- x. Right of access for TfL bus services
- y. Bus stops and / or standing areas with the provision of standard bus flags and bus shelters
- z. Delivery and Servicing Plans
- aa. Restricted parking permits (staff)
- bb. Cycleway Improvements
- cc. Legible London
- dd. Construction Management Plan
- ee. Deliveries and Servicing Plan

Employment and Training

ff. Business and employment initiatives (including training)

Sustainability

gg. Provision of Heat Network

hh. Carbon fund

- 6.9.2 This list is not exhaustive and an update on discussions will be provided at the meeting.

Affordable Housing

- 6.9.3 London Plan policy 3.12 seeks to secure the maximum reasonable amount of affordable housing on site. Core Strategy Policy 3 states that the Council will seek to achieve a borough-wide target of 40% affordable housing units in new developments of which the Council would expect a split of tenure to show 70% social/affordable rented units and 30% intermediate housing. Policy 3.12 of the London Plan indicates a 60/40 split. Both policies recognise the importance of viability assessments in determining the precise level of affordable housing to be delivered on any one site.
- 6.9.4 As submitted, the scheme seeks to deliver the 66 affordable housing units representing a 13% provision overall. Of the 66 units, 53 would be classified as 'key worker' accommodation under the direct control of the Trust (or Housing Association representative) for the housing of qualifying hospital staff with the remaining 13 units given over to the Local Authority for Social Rent.
- 6.9.5 While it is clear that the affordable housing provision would not accord to Policy CP3 of the Core Strategy, the Policy installs provisions to allow the Council to work with developers and other partners to agree an appropriate figure, taking into account site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations. Moreover, in relation to the subject site, due regard must be given to the wider social imperative to deliver a modern hospital facility.
- 6.7.6 A viability assessment has been submitted with the scheme. The Council's independent viability assessor has been consulted. The assessment demonstrates that the development is unable to deliver requisite levels of affordable housing across the site, which due to the cross-subsidising basis of the development proposal would be unlikely to yield meaningful surplus.
- 6.7.7 While it is acknowledged that colleagues in Housing have questioned the type of affordable housing provided, on the basis of the information provided, it is clear that the stated contribution lies at the very limit of viability for the scheme. Indeed, this coupled with the need to reprovide 'key worker' accommodation to service the new consolidated hospital – or a total of 53 residential units – the degree of social rented units offered would evidentially appear to be the maximum provision possible at this stage in the process. However, given the phasing of the development, the Trust have agreed to the inclusion of a review mechanism to be secured by s106, to ensure that any additionality can be captured through the development process.

Education

6.7.7 Provision is to be made for a school on the site, necessary to accommodate the demand generated by the residential development proposed, together with meeting established need in the area. Relevant contributions derived from the residential element of the development will be secured via s106..

6.8 *Community Infrastructure Levy*

6.8.1 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.

6.8.2 Given the phased nature of the development and the intention to discharge reserved matters on a phase by phase basis, CIL will be calculated and paid on a phase by phase basis.

6.9 *Other Matters*

Equalities Impact Assessment

6.9.1 An Equalities Impact Assessment has been submitted with the application. The consultation process has served to notify all relevant adjoining parties likely to be impacted by the development. However, additional regard has been given to any potential impact upon the protected characteristics outlined by the Equalities Act 2010 Section 149 and the provisions contained therein. It is considered that due regard has been given to the impact of the scheme on all relevant groups with the protected characteristics schedule and given the comments made in the previous '*Inclusive Access*' section and on the basis of the wider social imperative of the development to deliver a modern hospital facility there would no undue impact upon any identified group.

7. **Conclusion**

7.1 Chase Farm is a strategically important site for the Borough and its surround. The site is currently under-utilised and inefficient in form and function. This conspires to jeopardise the provision of a fit-for-purpose hospital facility to the site. The subject scheme is motivated by a desire to rejuvenate the area anchored and catalysed by the wider social imperative to deliver a modern and efficient hospital facility that can better adapt and accommodate to the existing and future healthcare needs of an ever growing and changing population – all with sufficient expansion space to respond to demand. In the need to cross-subsidise the site, parcels of land to the south of the site are required for release for the delivery of housing. Not only does the delivery of housing contribute to the supply and provision of a range of dwellings within the borough, it contributes to strategic housing targets, easing the housing crisis and providing viable new homes. In better utilising the land, the scheme represents a sustainable form of development extolled by the NPPF.

7.2 In the provision of a new primary school with three forms of entry, the development would further accommodate and deliver primary school places

defined as being in immediate and acute need. The creation of an interim school will accommodate immediate intake demands by 2015, and in ensuring its temporary status, with represent the 'very special circumstances' required to justify development of Green Belt land before full restoration by 2015. In the provision of a permanent school to the site, the development will serve to directly accommodate additional demand derived from the residential development. This again contributes to a balanced sustainable community.

- 7.3 While concern has been levied by a number of consultees in relation to the potential traffic and transportation implications of the development, through considered analysis, the submission of revised 'real world' evidence and alternative access arrangements to the school site, it has been concluded that the development can be accommodated within the existing highways network.
- 7.4 It is acknowledged that the development is unable to deliver a Policy compliant level of Affordable Housing, however, mindful of the requirements of paragraph 173 of the NPPF which requires that due regard and weight is afforded to issues pertaining to the overall viability and deliverability of the scheme, significant weight has been given to the stated economic constraints of the site and balanced them against the obvious benefits of the delivery of a modern hospital complex, which by the admission of the applicant is currently unsustainable. As such that it can be considered that the wider social, environmental and economic benefits of the scheme far outweigh any disbenefits.
- 7.5 In conclusion therefore the development proposed is considered acceptable and is supported. However, following the resolution of the Planning Committee, the application must again be referred back to the Mayor, to allow him 14 days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application, and any connected application
- 7.6 As this is a particularly large and complex scheme, the wording of conditions has not yet been fixed although the issues to be addressed by condition and or legal agreement have been highlighted throughout this report and are summarised below. Members are being asked in considering the officer recommendation to grant planning permission, to also grant delegated powers to officers to agree the final wording for these conditions and mechanisms to secure the delivery of those aspects of the scheme that cannot be dealt with through condition.

8. Recommendation

- 8.1 That, subject to referral to the Great London Authority, and the completion of a S106 Agreement, the Head of Development Management/ Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions to cover the following issues.

- 8.2 Conditions in summary

Overarching conditions

Phasing, including access provision across all phases

Construction Management

Hospital

1. Approved Plans
2. Time limitation
3. Phasing
4. Design Code
5. Reserved matters – siting/layout
6. Reserved matters – external appearance
7. Reserved matters – design
8. Reserved matters – landscaping
9. Daylight / Sunlight / Shadowing Report
10. Details of Materials
11. Details of Hard Surfacing
12. Details of Levels
13. Details of Enclosure
14. Details of Loading/Unloading/Turning Facilities
15. Details of Refuse Storage & Recycling Facilities
16. Details of External Lighting
17. Details of CCTV
18. Contaminated land and remediation strategy
19. Tree protection
20. Landscape management plan
21. Biodiversity measures including surveys, protection and relocation
22. Bird / Bat boxes
23. Potable Water
24. Rainwater harvesting
25. Green roofs and living walls
26. Sustainable Drainage System
27. Carbon reductions including performance certificate (35% over Part L)
28. Renewable energy strategy
29. BREEAM 'Excellent'
30. Green Procurement
31. Site Waste Management Plan
32. Demolition Statement
33. Air quality assessment
34. Impact piling
35. Details of works to multi-storey car park, layout, vehicle and pedestrian access external treatment and lighting, to meet 'ParkMark' standards and investigation of use of living wall
36. Inclusive access and design
37. Restricted Use Class
38. Limited construction hours
39. Cycle parking spaces
40. Acoustic report
41. Thames Water conditions

Residential

1. Approved Plans
2. Time limitation
3. Phasing
4. Design Code
5. Reserved matters – siting/layout

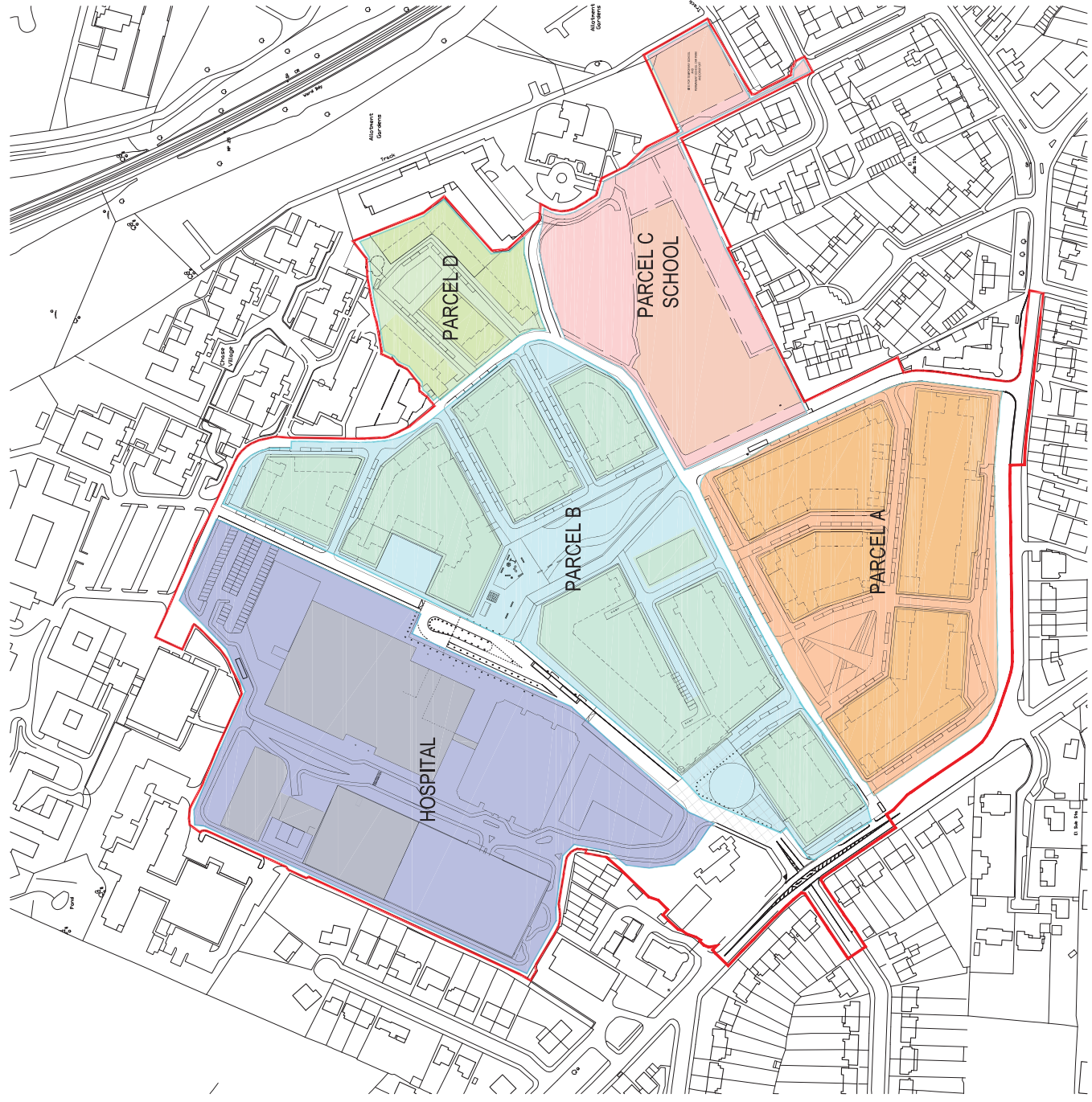
6. Reserved matters – external appearance
7. Reserved matters – design
8. Reserved matters – landscaping
9. Daylight / Sunlight / Shadowing Report
10. Details of Materials
11. Details of Hard Surfacing
12. Details of Levels
13. Details of Enclosure
14. Details of Loading / Unloading / Turning Facilities
15. Details of Refuse Storage & Recycling Facilities
16. Details of External Lighting
17. Details of CCTV
18. Details of communal telecommunications infrastructure
19. Restricted permitted development
20. Contaminated land and remediation strategy
21. Tree protection
22. Landscape management plan
23. Biodiversity measures including surveys, protection and relocation
24. Bird / Bat boxes
25. Potable Water
26. Rainwater harvesting
27. Green roofs and living walls
28. Sustainable Drainage System
29. Carbon reductions including performance certificate (35% over Part L)
30. Renewable energy strategy
31. CfSH Code 4
32. Green Procurement
33. Site Waste Management Plan
34. Demolition Statement
35. Air quality assessment
36. Impact piling
37. Details of works to multi-storey car park, layout, vehicle and pedestrian access external treatment and lighting, to meet 'ParkMark' standards and investigation of use of living wall
38. Inclusive access and design
39. Restricted Use Class
40. Limited construction hours
41. Cycle parking spaces
42. Acoustic report
43. Thames Water conditions

School

1. Approved Plans
2. Time limitation
3. Temporary consent (interim)
4. Phasing
5. Design Code
6. Reserved matters – siting/layout
7. Reserved matters – external appearance
8. Reserved matters – design
9. Reserved matters – landscaping
10. Daylight / Sunlight / Shadowing Report
11. Details of Materials
12. Details of Hard Surfacing

13. Details of Levels
14. Details of Enclosure
15. Details of Loading / Unloading / Turning Facilities
16. Details of Refuse Storage & Recycling Facilities
17. Details of External Lighting
18. Details of CCTV
19. Delivery of school access prior to occupation
20. Community use of facilities
21. Contaminated land and remediation strategy
22. Tree protection
23. Landscape management plan
24. Biodiversity measures including surveys, protection and relocation
25. Bird / Bat boxes
26. Potable Water
27. Rainwater harvesting
28. Green roofs and living walls
29. Sustainable Drainage System
30. Carbon reductions including performance certificate (35% over Part L)
31. Renewable energy strategy
32. BREEAM 'Excellent' including feasibility testing
33. Green Procurement
34. Site Waste Management Plan
35. Demolition Statement
36. Air quality assessment
37. Impact piling
38. Thames Water conditions





- KEY:
- ① new hospital
 - ② existing highlands
 - ③ multi storey car park
 - ④ carpark extension
 - ⑤ energy centre
 - ⑥ school site
 - ⑦ school turning & parking/ temporary school site
 - ⑧ clock tower



LEGEND

-  PROPOSED TREES
-  PROPOSED REPLACEMENT OAK TREES
-  POTENTIAL GREEN ROOFS
-  PERMEABLE PAVING (IN ROAD AND PARKING CONDITIONS ONLY)
-  PROPOSED HEDGE PATHS
-  PROPOSED HIGH QUALITY PAVING
-  PROPOSED GRASS / WILDFLOWER MEADOW
-  PROPOSED SPRUCE / SHALE PLANTING

