

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 1st September 2015

Report of
Assistant Director, Planning &
Environmental Protection

Contact Officer:
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Ward: Ponders
End

Application Number : 15/02039/OUT

Category: Major Large Scale –
Dwellings

LOCATION: ALMA ESTATE, EN3

PROPOSAL: Outline planning application for the phased regeneration of the Alma Estate comprising the demolition of Cormorant House, Curlew House, Kestrel House, Merlin House, Silver Birch Court, 1-34 Fairfield Close, 15-107 (odd) 63 (flats 1-9) Alma Road, 7-89 (odd) Napier Road, 5, 7, 9, 21-43 (odd), 45 Scotland Green Road, 98-142 (even), 171a South Street, Ponders End Youth Centre and Welcome Point Community Centre (including 746 residential units, 866sqm of retail shops and other uses with the South Street local parade, 1540sqm of community facilities, and associated works) and the erection of a maximum of 993 residential units, a maximum of 636sqm of flexible retail (A1/A2) floorspace, 150sqm of restaurant/café (A3) floorspace, 2,591sqm of community (D1)/leisure (D2) floorspace (to include 1540sqm for provision of a community centre and youth centre, 80 sqm of flexible A2/B1/D1/D2 floorspace, 439sqm for a gym and minimum of 532sqm to a maximum of 833sqm for a medical centre), retention of existing Multi-Use-Games-Area (MUGA), site wide energy centre, relocation and provision of telecommunications equipment, resited and open space and play facilities, landscaping, new access arrangements and highway works, public realm, car parking and associated works (all matters reserved). (An Environmental Statement, including a non-technical summary, also accompanies the planning application in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended by the 2015 Regulations)).

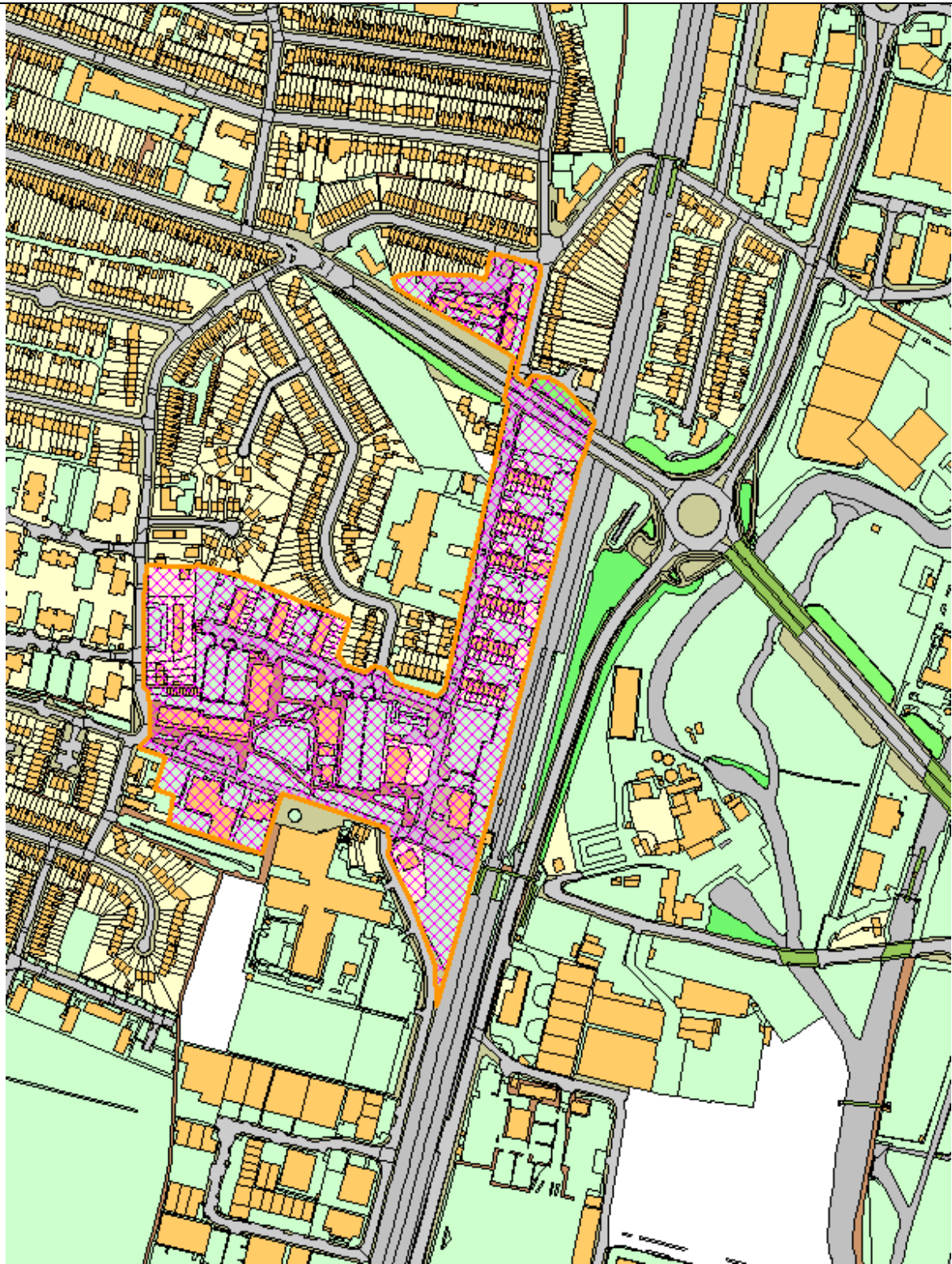
Applicant Name & Address:
Countryside Properties (UK) Ltd.
C/O Agent

Agent Name & Address:
Mrs Rosie Baker
Terence O' Rourke
Linen Hall
162 - 168 Regent Street
London
W1B 5TE

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** outline planning permission subject to conditions.

Ref: 15/02039/OUT LOCATION: Alma Estate, EN3 , ,



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Scale 1:5000

North



1. Site and Surroundings

- 1.1 The application site consists of the Alma Estate and a number of sites adjacent or nearby to this, including a block of flats at Fairfield Close, together with a further block fronting Scotland Green Road. The Alma Estate itself comprises the four iconic towers of Kestrel House, Cormorant House, Merlin House and Curlew House, and six double stacked maisonette blocks on Alma Road and also includes
- 1.2 In addition the Alma Estate, the application site also includes a number of 'additional sites', referred to as such as the original Masterplan for the regeneration of this area did not originally incorporate them. These additional sites are:
 - Silver Birch Court, located on the junction of South Street and Woodall Road;
 - Ponders End Youth Centre and Welcome Point Community Centre, located on the south side of South Street;
 - No.5, 7, 9 and 45 Scotland Green Road;
 - 1-9 Alma Road.
- 1.3 The original Alma Estate comprises 717 homes. With the homes of the additional sites included, the application site comprises 746 homes in total as existing. The application site also includes the 12 retail units that are designated as the South Street Retail Parade. The application site area is 7.9 hectares.
- 1.4 The application site is bounded to the east by the West Anglia Mainline, with Ponders End Station located to the south east of the site. The Lee Valley lies to the immediate east of the site, and covers a large area managed by the Lee Valley Regional Park Authority. South Street runs east to west through the application site and connects Ponders End Station to the south east of the application site with Ponders End High Street, which is located approximately 500m to the west (when measured from the corner of Scotland Green Road and South Street). The relatively recently constructed Oasis Hadley Academy is located on the south of South Street and does not fall within the application site. Woodall Road connects to South Street.
- 1.5 Alma Road runs north-south through the site, and the Lee Valley Road dissects the application site with development proposed at Fairfield Court which is due north of this. Scotland Green Road forms the western boundary of the application site and Napier Road runs through it.
- 1.6 The estate itself was built during the 1960s and none of the existing buildings are within the site are locally or statutorily listed and the site is not within a Conservation Area. The Ponders End Flour Mills Conservation Area, however, is located to the east of the site, separated by the railway line and A1055, and includes four Grade II Listed Buildings associated with Wrights Flour Mills.
- 1.7 The Environmental Agency Flood Zone map shows the site lies wholly within Flood Zone 1 'Low Probability' with the River Lee Navigation as the nearest main river, which lies approximately 200m to the east of the site. The King George V and William Girling Reservoirs lie further to the east and south-east of the Ponders End Flour Mill which forms part of the Chingford Sites of Special Scientific Interest (SSSI). The Lee Valley Special Protection Area

and Ramsar site, and the Epping Forest Special Area of Conservation, designated as internationally important for nature conservation, are located within approximately 5km of the application site.

- 1.8 South Street and Alma Road effectively form a 'spine road' through the development site. Alma Primary School and the relatively recently constructed Oasis Academy are located on these streets. The routes are well used during school peak periods although traffic does disperse well post-peak. The schools operate travel plans. The site lies outside any controlled parking zone, although localised on-street controls are provided where necessary for road safety purposes. On-street parking currently takes place across the site, as well as some off-street parking areas. Car usage / ownership is moderately low in this area.
- 1.9 Ponders End High Street and Nags Head Road (which links into Lee Valley Road) are part of the Strategic Road Network (SRN). Ponders End High Street is subject to a major improvement scheme resulting in a changed street environment. The scheme is considered as committed and is currently scheduled for completion before the estate regeneration would be complete.
- 1.10 The nearest section of the Transport for London Road (TfL) Network is the A10, Great Cambridge Road located at least 1.4km to the west of the site. Ponders End Station provides access to Central London at London Liverpool Street, and also Stratford, and services north to Hertford East or Broxbourne. There are three bus routes serving the site – 191, 313 and 491; route 191 operates through the site with existing stops on Alma Road and South Street. The site's existing Public Transport Accessibility Level (PTAL) rating is 2 (on a scale of 1 to 6 where 6 is excellent and 1 is very poor), and the level of public transport is therefore classified as poor. It is noted that Ponders End Station is indicated on the proposed regional route of Crossrail 2 that could operate from 2030.
- 1.11 The site lies outside of the Lea Valley Archaeological Priority Area. However, the Greater London Archaeological Advisory Service (GLASS) have advised that a recent study by the Museum of London Archaeology (MOLA) indicates that this is an area that could have been settled during the Bronze Age/Iron Age and later an area of seasonal grazing during the Roman period.
- 1.12 Planning permission was granted in June 2013 (ref. P13-00698LBE) for the construction of 38 affordable dwellings on the site to the west of the Oasis Academy. This development is currently under construction and is known as DuJardin Mews. This is a Council-led project that is part of the wider regeneration plans for Ponders End and North East Enfield.
- 1.13 The following image, extracted from the applicant's submission documents, shows the application site as denoted by the red line, Ponders End train station along with the railway track, the location of Ponders End Flour Mill to the east of the site, and Alma Primary School and Oasis Academy. The image also indicates the locations of the major roads running through and around the site.

Design and Access Statement that confirm in greater detail the form and mix of the development proposed.

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

- The phased demolition of the existing residential and non-residential buildings on the site;
- The erection of 993 new residential units, which would consist of the following:
 - 312 one bed units;
 - 497 two bed units;
 - 153 three bed units;
 - 30 four bed units;
 - 1 five bed unit;
- 636 sqm of retail (A1/A2) floorspace;
- 150 sqm of restaurant/café (A3) floorspace;
- A new gym (439 sqm);
- A replacement Welcome Point community centre (330 sqm);
- A replacement Ponders End youth centre (1210 sqm);
- A new medical centre (minimum of 532sqm to maximum of 833sqm)
- 80 sqm of flexible A2/B1/D1/D2 floorspace for relocated community / commercial uses;
- A site wide energy centre;
- Approximately 590 car parking spaces and cycle provision;
- 8,058 sqm of public open space;
- 3,876 sqm public play spaces (including LEAPs, doorstep play, civic play and natural play);
- Private amenity space including balconies and gardens;
- Communal gardens;
- Retention of the existing Multi Use Games Area (MUGA); this falls within the application site but no changes are proposed to it;
- New streets and shared surfaces with pedestrian and cycle priority;
- Relocated bus stops.

Phasing

2.4 As one would expect for a development of this size and scale, as the application is in outline, should it be granted it would be built over a relatively long period, which in this case is anticipated to be up to 2026. Accordingly, the proposed development is split into seven phases of demolition and construction.

2.5 During the course of the application the applicant requested that the phasing plan be changed, in that the site formally referred to as Phase 1B is to be incorporated within Phase 2A; this phase would now incorporate the Woodall Road / Silver Birch Court site and the land to the north of South Street. In addition, the Ponders End Youth Centre and Welcome Point Community site has been renamed as Phase 2A (II) (where it was previous Phase 1C). The revised phasing schedule is set out below, along with the applicant's updated Phasing Plan which is attached at the end of this report

Phase	Demolition	Construction
1A	2015 – 2016	2016 – 2018

2A	2017 – 2020	2017 – 2021
2A (II)	2017 – 2018	2018 – 2020
2B	2018 – 2020	2019 – 2021
3A	2021 – 2022	2022 – 2024
3B	2024	2024 – 2025
4	2024	2024 – 2026

Application Submission Documents

2.6 In addition to the application forms (including CIL form) and drawings the following supporting documents have been submitted with the application:

- Design and Access Statement, including Landscape Statement and Strategic Design Code
- Energy Strategy
- Environmental Statement Volume 1: Report
- Environmental Statement Volume 2: Appendices
- Environmental Statement Non-Technical Summary
- Health Impact Assessment
- Planning Supporting Statement, including Affordable Housing Statement and Retail Statement
- Statement of Community Involvement
- Sustainability Assessment
- Telecommunications report
- Transport Assessment
- Tree Survey / Arboricultural Statement
- Utilities and Foul Water statement
- Viability assessment (submitted confidentially)

Environmental Impact Assessment (EIA)

2.7 The development falls within the thresholds set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011 (as amended) whereby an Environmental Impact Assessment may be required to accompany the planning application for the purposes of assessing the likely significant environmental effects of the development.

2.8 Schedule 2 paragraph 10(a) of the Regulations states that proposals for urban development projects of more than 0.5 hectares in area may require an Environment Impact Assessment (EIA). The application site area is 7.9 hectares and given this and taking into account the characteristics of the proposal, the location of the development and the characteristics of the potential impact the proposed development is considered to be EIA development within the meaning of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011 (as amended).

2.9 On 4th July 2014 the applicant made a request for a Scoping Opinion under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011 (as amended) for the proposed development. The Council issued its response to this on the 30th October 2014.

2.10 Accordingly, this planning application has been accompanied by an Environmental Statement (in two volumes and including appendices). The EIA has been undertaken in relation to both this outline planning application, and the accompanying full planning application ref. 15/02040FUL, which forms the first phase of the development proposed. Accordingly, the Environmental Statement covers the two different scenarios, which are:

- Outline Planning Application for the entire development, based on an anticipated completion year 2026: Effects have been assessed at completion, the year upon which it is anticipated that the proposed development will be completed and fully occupied, unless worst case effects will occur in an earlier year; and
- Full planning application for 'Phase 1A' of the development, based on an anticipated completion year of 2018; this is described in the Statement as the 'Interim Scenario'. This is an assessment of the proposed development of Phase 1A development, which assumes the development takes place in the context of the existing Alma Estate Regeneration.

2.11 The topics addressed in the Environmental Statement are:

- Socio-economic
- Transport and Access
- Air Quality
- Noise and Vibration
- Townscape and Visual
- Heritage
- Land and Water Quality
- Hydrology and Flood Risk
- Daylight and Sunlight
- Environmental Wind
- Ecology
- Impact Interactions

2.12 The Environmental Statement includes a consideration of the residual effects, interrelationships, cumulative and non-significant effects. The Environmental Statement considers the likely significant effects of the proposed development in the context of other local developments likely to come forward, as well as the cumulative effects that may result from the proposed development and these other developments. The Council issued a schedule of sites for the applicant to consider as part of the assessment of likely cumulative effects as part of the EIA, and the Environmental Statement does this accordingly.

2.13 The EIA Regulations require the applicant to set out in the ES an outline of the main alternatives to the proposed development considered by them, indicating the main reasons for the choice made, taking into account the environmental effects. The regulations do not require the applicant to undertake a sequential assessment of alternative sites but rather an assessment of the outline of main alternatives and an indication of main reasons for not pursuing them. The applicant's submitted ES undertakes this exercise and Officers are satisfied with the assessment and conclusions provided.

2.14 All of the environmental information contained within the Environmental Statement, including proposed mitigation measures (where relevant) has been taken into consideration. The additional information and revisions during

the course of the application are all considered to be minor in nature and do not alter the conclusion that the proposal's environmental impact, subject to mitigations, is acceptable.

Pre-application engagement and consultation

- 2.15 The applicant has submitted a Statement of Community Involvement (SCI) documenting the consultation carried out prior to the submission of the application. The extent of this engagement has been, it is fair to say, extensive. In addition to the direct pre-application engagement the applicant has undertaken with the Council's Planning Department (via a Planning Performance Agreement (PPA)), the applicant also sought pre-application advice from the Greater London Authority (GLA) and undertook a number of community engagement events. In relation to the latter, the applicant highlights over the course of 2014 and 2015, they undertook 10 workshops, walkabouts and a coach trip to comparable schemes with existing residents.

3. Relevant Planning Decisions

- 3.1 The following application has been submitted simultaneously with this application and covers part of the outline application site referred to as Phase 1A:
- 3.2 15/02040/FUL – Full planning application for Phase 1a of the Alma Estate master plan comprising the demolition of buildings on those locations specified in the site address (including 163 residential units and associated works) and the construction of 228 residential units in two (four to sixteen storey) buildings, 150sqm of restaurant/cafe (A3) floorspace at ground floor, 439sqm of gym (D2) floorspace at ground and first floor, new and improved open space and play facilities, cycle and refuse storage, car parking, new access arrangements and highway works, relocation and reprovision of telecommunications equipment, landscape and ancillary works. (An Environmental Statement, including a non-technical summary, also accompanies the planning application in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended by the 2015 Regulations)). PENDING CONSIDERATION
- 3.3 The following application was submitted in 2012 by different applicant on the Silver Birch Court / Woodall Road / 173 South Street site, which forms part of Phase 2A. No decision has yet been made on this application as the development proposed generates a number of issues that have not yet been satisfactorily resolved.
- 3.4 P12-02112PLA – Redevelopment of site to provide a total of 50 self-contained residential units and 2 retail units with basement car parking (56 spaces) comprising erection of a part 6, part 7-storey block (Block A) of 20 flats (5 x 1-bed, 12 x 2-bed, 3 x 3-bed) and 5 x 3-bed maisonettes fronting South Street with 2 retail units to ground floor level, and erection of a part 3, part 5-storey block (Block B) of 20 flats (6 x 1-bed, 10 x 2-bed, 4 x 3-bed) and 5 x 3-bed maisonettes with amenity space at roof level fronting Woodall Road, together with external refurbishment of Silver Birch Court.

4. Consultations

4.1 Statutory and non-statutory consultees

Planning Policy:

4.1.1 No objection.

- Overall development achieves the 40% affordable housing policy target, however there is a net loss of affordable units;
- The tenure split does not directly accord with policy, 50:50;
- Given the scale of regeneration there is only a modest increase of family units across the masterplan area;
- Further clarification should be sought on the submitted viability information/decant strategy to determine optimum levels that can be achieved. Conditions to ensure further viability information for future phases/reserve matters applications to capture optimum levels of affordable housing/tenure split based on market uplift;
- Net increase of retail floorspace of 157 m² is minimal given the uplift in units numbers and will not materially change the designation or impact Ponders End High Street; and
- The landscape proposals reduce the overall amount of public open space from 15,191m² to 14,906m². However, given the overall comprehensive approach to regeneration, the quality of the replacement provision (public/private/communal) is clear, legible and usable landscape and civic space with clear function.

Traffic and Transportation:

4.1.2 No objection subject to conditions and a Section 106 Agreement, and measures controlled through a Section 278 Agreement.

Urban Design:

4.1.3 No objection in principle but detailed comments made. Overall the development is supported, subject to the successful resolution of a number of points or requirements for them to be resolved through reserved matters where appropriate. The proposals for phase 2Ab(II) are not supported, and do not provide the improvements necessary to support residential development along Falcon Road Spur. Due to inconsistencies and/or omission, a great deal of scrutiny will be needed as detailed applications are submitted.

Housing Development and Renewal:

4.1.4 As a consultee for the application Housing fully support the Alma Estate project. They have been working very closely with the residents of the estate and the local community to support the regeneration of the area. As a team they have held a number of design panels with residents who have made valuable contributions to the layout of the new scheme externally and internally. Consultation will continue with the residents following a consent to ensure design principles continue during each phase

4.1.5 The provision of affordable housing within the application of 200 social rented reflects the expressed wish in 2012 of residents on the estate who stated they wished to remain. Of the 199 intermediate homes within the application 126 will be provided by Newlon Housing Trust as shared ownership. Of the

remaining 73 homes Housing Development and Renewal would require flexibility on the tenure based on a review of need on a phase by phase basis.

- 4.1.6 The original needs survey of residents on the estate was carried out in 2012 and informed the current application unit mix. Recent surveys of secure residents who could be considered for Phase 1A indicate that there have been changes in the demographics with natural changes in the size of households. The first 97 completions of the social rent homes will be in the winter of 2017 / 2018, some five and a half years plus since the original needs survey. Forty four of the social rented homes completions will be in 2021; forty nine in 2024 and the last ten in 2026, fourteen years since the needs survey established the unit mix.
- 4.1.7 Rehousing of existing secure tenants on the Alma Estate is subject to an agreed Local Lettings Plan (LLP). The potential impact of the generous provision of the LLP, (currently under review) may result in a greater need for larger family sized accommodation than is provided in the current applications unit mix. The LLP guarantees an extra bedroom to tenants with children of the same gender when the older child is 18 years old, and, when there is a 7 year or more age gap between the two youngest children of the same gender. This alongside the changing household composition will result in a need for a different unit mix to reflect the need for larger family units.
- 4.1.8 Given the inevitable household composition changes over such a long period of time and the current LLP, Housing Development and Renewal would require flexibility on the unit mix based on a review of need on a phase by phase basis.

Neighbourhood Regeneration:

- 4.1.9 Support the development. The proposal addresses 'the needs of Enfield and its residents by providing the redevelopment of existing housing and additional housing stock, new fit for purpose community facilities and retail units, and improved public realm, open spaces and a new station square. Also notes that the pre-planning consultation was exhaustive, and that the scheme is designed to enable the development of social infrastructure within the local community and embed a sense of ownership amongst local residents. The Neighbourhood Regeneration team welcomes the opportunity to continue to develop this aspect of the scheme working alongside the local community, and developer partners, for the broader regeneration of the Alma Estate. The scheme is part of the wider regeneration programme of Ponders End, which includes Dujardin Mews, the Electric Quarter, Two Brewers memorial, South Street public realm improvements and Ponders End Park enhancements.

Early Years Development Officer:

- 4.1.10 No objection, but comments that there is a need for provision in the area for childcare in the form of additional spaces for 2, 3 and 4 year old due to increase in demand and targets set from the government

Tree Officer:

- 4.1.11 The Tree Officer has no objection to the application subject to conditions.

Conservation Officer:

- 4.1.12 No objection and fully support the scheme in principle. The proposed demolition of the four existing tower blocks and their replacement with improved residential accommodation will enhance the setting of both the listed mill buildings and Ponders End Conservation Area.

Sustainable Design Officer:

- 4.1.13 No objection in principle but some concerns raised in relation to the approach taken on various sustainability elements of the scheme, and therefore recommends planning conditions to overcome these concerns.

Environmental Health:

- 4.1.14 No objection. The majority of the issues of environmental concern are broadly addressed by the outline application. However, exact detail is not available and therefore conditions in relation to air quality, noise and contaminated land will be required to ensure all matters are fully considered.

Health, Housing and Adult Social Care:

- 4.1.15 No objection but comment the proposals should be considered in the light of mini-Holland / Cycle Enfield; there should be access to good quality fruit and veg built into the estate; 'incidental social interaction' should be built into the estate e.g. that people bump into each other thereby increasing cohesion, people knowing each other and reducing fear of crime.

Greater London Authority (GLA):

- 4.1.16 The subject application is referable to the Mayor. A Stage 1 response to the application was issued on the 3rd July 2015 in which the GLA advised that whilst the scheme is broadly supported in principle, the application does not fully comply with the London Plan for the following reasons:
- Principle of development: The proposed estate regeneration responds to local consultation and reflects the objectives of the Upper Lee Valley OAPF and emerging North East Enfield AAP. Accordingly, the principle of the comprehensive renewal of Alma Estate is supported in strategic planning terms.
 - Housing: The proposed estate regeneration would deliver a step change in housing quality; support mixed and balanced communities; and, appropriately provide family sized housing as part of a well-considered illustrative residential schedule. However, the net loss of affordable housing does not comply with London Plan Policy 3.14. Accordingly, it should be demonstrated that the regeneration scheme would deliver the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.
 - Urban design: The proposed masterplan is generally well laid out, and successfully combines generous public spaces with a new well-activated and legible street grid that would knit the estate into the surrounding neighbourhood. The approach to scale is acceptable in strategic planning terms, and generally responds well to the surrounding context. Accordingly the masterplan design is supported in accordance with London Plan Policy 7.1.

- Inclusive access: The proposed approach to access and inclusion is supported in accordance with London Plan Policy 7.2
- Sustainable development: The proposed energy strategy is supported in accordance with London Plan Policy 5.2. GLA officers would nevertheless welcome further discussion with respect to prioritising a future connection to the proposed Lea Valley Heat Network. Other measures with respect to climate change adaptation and noise mitigation are broadly supported and should be secured by way of planning condition to ensure accordance with London Plan policies 5.10, 5.11, 5.13 and 7.15.
- Transport: Whilst the proposal is broadly acceptable in strategic transport terms, the applicant should address the matters raised in this report with respect to parking; walking and cycling; bus priority and infrastructure; and, travel and freight planning to ensure accordance with London Plan policies 6.2, 6.9, 6.10, 6.13 and 6.14.

4.1.17 The GLA advise that the resolution of these issues could lead to the application becoming acceptable in strategic planning terms. Given the issues raised by the GLA at the Stage 1 process, they 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.

Environment Agency:

4.1.18 The Environment Agency advise that they raise no objection to the development subject to conditions to control and remediate contamination, address surface water drainage and the method of piling.

Metropolitan Police:

4.1.19 The Metropolitan Police have no objection to the application and make the following comment:

“The layout and build design in our opinion does not appear to unduly increase the risk of criminal and ASB to the retained neighbouring properties or the proposed new developments. The proposed development promotes good sight lines and passive natural surveillance, with many overlooking windows to public areas. Legitimate footfall is encouraged through clearly defined public routes with accommodating footways and appropriately located open and visible, shared community public space areas. Private ownership of other areas has been clearly defined by appropriate boundary treatment and access control, promoting permeability where possible. All of these, in our opinion, are essential ingredients to support a sustainable, safe, welcoming, empowered diverse community.”

Thames Water:

4.1.20 Thames Water raise no objection to the proposed development but make a range of comments, the majority of which fall outside of the planning process as they are matters that are covered by other legislation/regulations (for example, the Water Industry Act 1991).

4.1.21 Thames Water does stipulate that no impact piling should take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. A planning condition controlling this matter is recommended accordingly.

4.1.22 Thames Water advise that, having reviewed the drainage strategy documents provided, with regard to sewerage infrastructure they do not have any objection to the planning application provided that details of site drainage and discharge values shown in Surface Water Management Strategy (15_02039_OUT-APPENDIX_J.6-1510723.pdf) are adhered to.

Network Rail:

4.1.23 No objection raised but make various comments in relation to matters the developer must consider or adhere to with regards to the actual construction of the development.

Canal & River Trust:

4.1.24 No comment as the application falls outside the notified area for its application scale.

London Fire Brigade:

4.1.25 No objection, confirms that the application is satisfactory in respect of fire brigade access. Advises that the scheme will still be subject to the provision of suitable fire mains, smoke ventilation systems, protected staircases and fire fighting staircases where required but that these matters will be addressed at Building Control stage.

Natural England:

4.1.26 No objection. Confirms that the proposed development would not affect the Chingford Reservoirs Site of Special Scientific Interest (SSSI) and are pleased to see proposals for the provision of accessible green and open spaces. Comments that the Alma Estate is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision, and as such they encourage the incorporation of GI into the regeneration proposals, in particular green roofs. Various comments made in relation to biodiversity improvements

Historic England:

4.1.27 No objection, subject to conditions. Historic England's initial concerns have been dealt with through the submission of additional information in the form of an addendum to Chapter 12 of the Environmental Statement.

Sport England:

4.1.28 Objection. The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management

Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184), therefore Sport England has considered this a non-statutory consultation. The proposed net increase in dwellings is 247 dwellings, equating to 593 people. No formal sports provision is proposed as part of the application. Sport England has assessed the application against its adopted planning policy objectives, highlighting that the focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. Sport England note that the submitted Planning Supporting Statement sets out draft Section 106 Heads of Terms and that formal sports provision has not been included anywhere within the list of identified areas where financial contributions will be provided. Sport England consider that there is a strong case in favour of seeking a substantial financial contributions towards formal sport provision.

Lee Valley Regional Park Authority:

- 4.1.29 No objection in principle raised but comment that the Authority is concerned over the omission of references within each application to secure improvements to access to the Regional Park. Planning obligations should be secured to re-design the existing bridges from the proposed station square to the Regional Park. The Authority would wish to be consulted on the development of a public realm strategy for the estate to ensure that access and signage improves legibility and permeability to the Park.

Oasis Hub Hadley:

- 4.1.30 No objections, and makes the following comments:

Oasis Hub Hadley sits directly opposite the Alma Estate and serves many of its residents. We are encouraged that much of the community provision is being replicated but we would also like to look at the possibility of providing some multi use spaces. As a key stakeholder, we are keen, that the re-provision of services maximises services to the community whilst minimising costs and reflecting real community need. It is our experience that bringing facilities together into one location increases community engagement and use. With this in mind we would like to make the following recommendations:

- One larger building that brings the youth provision and community provision together under one roof - creating a wrap-around care provision whilst further scope for alternative use; a “Hub” of community activity.
- Outdoor Natural Play Space to serve community, nursery and youth activities.
- Community Kitchen - fitted to act as a café as well as enabling cookery classes for community education. Within the space we would hope to see: Nursery for 2 year olds and 3/4 year old.
- Adult learning space (ESOL, finance etc).
- Computer Suite - to enable Adult Learning, and Free Community Internet Access.
- A space for Academy Alternative Education Provision (AAP) - this provides a GCSE education to a small group of Key Stage 4 students.
- A play/ leisure space for young people including youth clubs, and targeted youth work.
- Stay and Play space - a free provision for parents with children aged 0-5.

- A space for a nurture group for Key Stage 2 and 3 students from local schools who are finding main stream schooling challenging with the aim of short term interventions.
- Community Social Groups – inc. Coffee Mornings, Book Clubs
- Senior Day Care Sessions.
- Family events including games nights, arts and crafts, family dance classes.
- Holiday Activities – diversionary during school holidays for children and young people.
- Small private meeting spaces for hire/ private consultation.

4.2 Public response

4.2.1 The application was referred to 1814 surrounding properties on the 20th May, a press notice released (as featured in the Enfield Independent on 27th May) and four site notices were posted on and around the site on the 19th May. Three written responses have been received. One from a local resident querying what the arrangements for moving out are. However, this relates to the decant programme being operated by the Council's Housing department.

4.2.2 The second response is from Metropolitan Housing Trust (MHT), who own 63 Alma Road. This is referred to as 'Site 5 – 1-9 Alma Road' in the planning application, one of the 'additional sites' that has been identified to be brought into the regeneration Masterplan. MHT have objected as they do not consider that their site should be included within the outline application. Analysis of this issue is set out in the main report below.

4.2.3 The third response has been received from Longwood Properties London Ltd (Longwood), who own Silver Birch Court, the site referred to as 'Site 4 – Woodall Road' that is located on the corner of South Street and Woodall Road, another of the 'additional sites' that has been identified to be brought into the regeneration Masterplan. Longwood have objected as they do not consider that their site should be included within the outline application. Analysis of this issue is set out in the main report below.

Planning Panel:

4.2.4 A Planning Panel was held on 10th June 2015 at Alma Primary School to discuss the application. A full transcript of minutes of the panel is appended to this report.

5. Relevant Policy

5.1 The London Plan (Consolidated With Alterations Since 2011) March 2015

5.2 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. Since the 2011 plan was published in July of that year, revised early minor alterations (REMA) were made to ensure it reflected the National Planning Policy Framework and the Government's approach to affordable housing. These were formally published on 11th October 2013. Draft further alterations to the London Plan (FALP) were published for public consultation in January 2014 to reflect Mayoral priorities set out in his *2020 Vision: The Greatest City on Earth – Ambitions for London*⁶, particularly the need to plan for the housing and economic

capacity, needed for London's sustainable development against the background of the growth trends revealed by the 2011 Census. These have now been incorporated, along with the changes made by the REMA, into the consolidated London Plan which was published in March 2015.

5.3 The following policies are considered pertinent to the assessment of this application:

- 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

5.4 Local Plan – Core Strategy (2010)

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

5.5 Development Management Document (2014)

5.6 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

5.7 North East Enfield Area Action Plan (Submission Version)

5.8 The North East Enfield Area Action Plan [NEEAAP] sets out a comprehensive approach to planning the future of North East Enfield. The current stage of the NEEAAP is that the Proposed Submission AAP was subject to its Examination in Public from the 28th April to the 1st May 2015. The Inspector's Report is expected in September with full adoption anticipated to be in November.

5.9 The following policies are considered pertinent to the assessment of this application:

- 5.10 Policy 4.1 – Encouraging Modal Shift
- Policy 4.2 – Improving the Quality of the Pedestrian and Cycling Environment
- Policy 5.1 – Affordable Housing
- Policy 5.2 – Mix of housing types

Policy 5.3 – Improving the public realm
Policy 7.1 – Providing community facilities
Policy 8.1 – Enhancing existing open spaces
Policy 8.2 – Providing new open space
Policy 8.3 – Joining green spaces together
Policy 9.1 – Sustainable Energy
Policy 11.1 – South Street Area
Policy 11.2 – Alma Estate regeneration
Policy 11.3 – Ponders End station

5.11 National Planning Policy Framework

5.12 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.

5.13 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.

5.14 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.

5.15 National Planning Practice Guidance

5.16 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.

5.17 Other Material Considerations

Upper Lee Valley Opportunity Area Planning Framework
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
Mayor's Transport Strategy
Land for Transport Functions SPG
London Plan; Mayoral Community Infrastructure Levy
Circular 06/05 Biodiversity and Geological Conservation – Statutory Obligations and Their Impact within the Planning System
Section 106 SPD
Biodiversity Action Plan
Ponders End Flour Mills Conservation Area Character Appraisal

6. Analysis

6.1 The main issues to consider are as follows:-

- i. Principle of development:
 - The Development Plan and the principle of estate regeneration
 - Inclusion of additional sites
 - Housing Supply, Density and Mix
 - Affordable housing
 - Non-residential uses
- ii. Design:
 - Layout, mass, bulk and height, including Design Code
 - Heritage impacts
 - Residential standards
 - Inclusive access
 - Children's Playspace
 - Landscaping and public realm, including Arboricultural Assessment
 - S17 Crime and Disorder
- iii. Impact on neighbouring properties
- iv. Traffic and Transportation matters:
 - Pre-application
 - Proposed development
 - Trip Generation

- Parking
- Public Transport
- Road Safety
- Walking and Cycling
- Travel Plans
- Delivery and Service Plans
- Construction Traffic Management
- v. Sustainable design and construction
- vi. Environmental Impacts and other considerations:
 - Flood Risk / Sustainable Urban Drainage
 - Contaminated Land
 - Air Quality
 - Noise and Vibration
 - Biodiversity
 - Archaeology
- vii. Planning Obligations and Community Infrastructure Levy;
- viii. Other matters.

6.2 Principle of development

The Development Plan and the principle of estate regeneration

- 6.2.1 The Development Plan consists of The London Plan (Consolidated with Alterations Since 2011) March 2015 and the Council's Core Strategy (2010) and Development Management Document (2010). The Council is also preparing the North East Enfield Area Action Plan (NEEAAP) which includes the site the subject of this application; the NEEAAP has been subject to its Examination in Public (EiP) and is anticipated to be adopted in November 2015.
- 6.2.2 The London Plan (Consolidated with Alterations Since 2011) March 2015 (*herein after referred to as the London Plan*) sets out the strategic framework for the city. Policy 2.14 of the London Plan sets out at a strategic level the areas for regeneration, and instructs Boroughs to identify 'integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing, in locally-based plans, strategies and policy instruments such as LDFs and community strategies.
- 6.2.3 The London Plan designates Ponders End as a growth area within the Upper Lee Valley Opportunity Area, a total 3,900 ha area that is set to deliver 20,100 new homes as a minimum and with an indicative employment capacity of 15,000 jobs across the entire Upper Lee Valley Opportunity Area as a whole. The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) produced by the Greater London Authority (GLA) working with Transport for London (TfL) and the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney, and was adopted by the Mayor in July 2013.
- 6.2.4 Pursuant to the delivery of the spatial strategy for London, Policy 2.13 Opportunity Areas and Intensification Areas of the London Plan requires proposals to:
- support the strategic policy direction for the Area;
 - optimise residential and non-residential output and provide necessary infrastructure;

- contribute to meeting (or exceeding where appropriate) the Area's employment and housing outputs;
 - promote inclusive access including cycling and walking; and
 - support wider regeneration.
- 6.2.5 The ULV OAPF is Supplementary Planning Guidance to the London Plan and sets out an overarching framework for the regeneration of the area. Among the eight objectives identified by the ULV OAPF, the following are relevant to the proposed development of this site:
- Growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and *Ponders End* (emphasis added);
 - A Lee Valley Heat Network linked to the Edmonton Eco Park;
 - Significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area;
 - A fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife.
- 6.2.6 The London Plan and the ULV OAPF give clear support for the regeneration of the site for the purposes of achieving the strategic aims of these documents.
- 6.2.7 At a local level Core Policy 1 of the Council's Core Strategy designated North East Enfield as one of four Strategic Growth Areas. Core Policy 40 sets out that the focus of the 1,000 new homes to be delivered in the growth area will be Ponders End. Core Policy 41 identifies three sub-areas within the Ponders End Place Shaping Priority Area where development is appropriate: Ponders End Central, Ponders End South Street Campus and Ponders End Waterfront. Core Policy 41 sets out that the objectives of new development in Ponders End will be to create up to 1,000 new homes up to 2026, with a range of sizes and tenures, including affordable homes.
- 6.2.8 Following the adoption of the Core Strategy, a strategic review of housing stock was undertaken by the Council in 2011, and this review identified the Alma Estate as a requiring significant improvement. Following further engagement with local residents, including the Alma Residents' Association (ARA), 80% of existing Council tenants and leaseholders surveyed supported proposals for the regeneration of the estate, as opposed to refurbishment. Accordingly, in July 2012 the Council's Cabinet approved demolition and redevelopment of the entire Alma Housing Estate on South Street to replace the existing 717 residential properties with 750-1000 new homes.
- 6.2.9 In response to this, and as part of the commitments in the Core Strategy, the Council has proposed an Area Action Plan (AAP) for the Strategic Growth Area of North East Enfield. The AAP will provide a comprehensive planning framework and identifies opportunity sites for redevelopment and key infrastructure in North East Enfield. The AAP was submitted to the Secretary of State for independent examination on the 23/10/2014 and the Examination in Public (EiP) took place between the 28/04/2015 to the 01/05/2015.
- 6.2.10 Following the EiP, the Council undertook further consultation on the Main Modifications to the AAP. 22 Main Modifications were proposed in the 'Schedule for Public Consultation May 2015'. The only proposed modification

of direct relevance to the overall consideration of this application is Proposed Main Modification (PMM) 2, which relates to the NEEAAP's second chapter on 'Area Context and Opportunities'. PMM2 proposes the insertion of the following two new paragraphs, to be numbered 2.3.29 and 2.3.30, with the following existing paragraphs renumbered accordingly:

"2.3.29 Part of the Ponders End: South Street and the Alma Estate area falls within two important view corridors - westwards from King's Head Hill in the adjacent London Borough of Waltham Forest; and eastwards on the approach to Enfield Town from Windmill Hill. The views chosen are valued because they make a significant contribution to a person's ability to understand the borough and Enfield's position within the wider north London context.

2.3.30 The bridge over the railway line provides important long views southwards towards the City of London and Docklands with tall buildings clearly visible and silhouetted on the horizon."

6.2.11 It is considered that PMM2 would not result in a significant change in terms of the overall consideration of this application, with the applicant having evidenced in detail how they have assessed the impact of the proposed development in visual and townscape terms having regard to local views.

6.2.12 Whilst the AAP has not yet been adopted by the Council as part of the formal Development Plan – this is currently scheduled for November 2015 – given the advanced stage of its preparation, in particular that its EiP has taken place, it is considered that significant weight can be given to its draft policies.

6.2.13 Chapter 3 of North East Enfield Area Action Plan (NEEAAP) sets out the vision and objectives for the area. A key objective of the NEEAAP is to encourage and bring forward major developments to change and improve the image and identity of the area. Two of the key sites listed are:

- the regeneration of the Alma Estate, which will reintroduce traditional streets and spaces into the area and provide high quality homes for a range of different households;
- the South Street Area, where a number of smaller sites will come together to extend the quality of the Alma Estate regeneration to a wider area.

6.2.14 Chapter 11 of the NEEAAP sets out the strategy and policies for the sub-area referred to as 'Ponders End: South Street, Alma Estate and Station'. The NEEAAP sets out that these three areas, being so closely linked to one another, require a coordinated approach for their successful regeneration.

6.2.15 In relation to the principle of the estate regeneration, the applicant, reflecting on the history of the site and the surveys undertaken by the Council, highlights in paragraph 2.22 of their Planning Supporting Statement that:

"The housing stock is of poor quality and no longer fit for purpose, and would fail to meet the requirements of current housing design standards. Enfield Council's July 2012 Cabinet Report highlighted that the estate is in a poor state of repair with a number of leaks having damaged some of the tower blocks, problems with balconies and cladding, and unreliable lifts. It also highlights that the Alma Estate suffers from serious problems of overcrowding with families residing in inadequately sized properties. One of the key aims of the regeneration of the Alma Estate is to address these overcrowding issues and to provide an uplift in the number of new homes to meet the chronic

shortage in the area. The new development will see the replacement of an existing housing estate that suffers from structural problems, is costly to maintain and would be expensive to bring back to a good standard, with high quality new housing stock.”

- 6.2.16 It is clear that the policies of the Development Plan, and the objectives of the emerging NEEAAP, are supportive of the regeneration of the Alma Estate and the additional sites that make up this outline application.
- 6.2.17 In terms of the broad principle of development, therefore, the application is considered to be acceptable. However, there are of course a number of detailed policies contained within the Development Plan and the emerging NEEAAP that the proposed application must be assessed against.

Additional sites

- 6.2.18 As referred to above, a number of additional sites have been brought into the development proposed by the outline planning application. These are referred to as ‘additional sites’ as they did not form part of Countryside’s original bid document when it was selected as the preferred bidder by the Council (in its housing / regeneration role) at the end of 2013. The original redevelopment brief was a site area of 6.08 hectares, comprising 717 properties, including the four tower blocks, maisonettes, low-rise flats and houses. This reflected the aspirations for the development of this site, which as referred to above, are set out in the NEEAAP.
- 6.2.19 Following the bid stage a decision was taken to expand the regeneration area to include a number of sites adjoining the Alma estate, and the inclusion of these sites has allowed more comprehensive regeneration proposals to be developed, particularly along South Street and around Station Square, where both sides of the street can be included within an overall design strategy.

There are six additional sites (although the Ponders End Youth Centre and Welcome Point Community Centre could be considered as a single site) and are described below with reference to the applicant’s numbering of them as set out in their Design and Access Statement (NB this numbering appears to have omitted 3, hence this is not referred to):

Site 1 – 45 Scotland Green Road

This site is currently occupied by a single detached dwelling house with a very large garden; the existing building is set well back from the frontage of Scotland Green Road.

Site 2 – 5, 7 and 9 Scotland Green Road

This is a terrace of three two storey prosperities which front onto Scotland Green Road.

Site 4 – Woodall Road

This site (Phase 2A), currently consists of Silver Birch Court, a single building comprising 16 flats, and part of the site is vacant following the demolition of the Railway Tavern. The site has three ‘sides’ consisting of South Street to the north, Woodall Road to the south-west and the railway line to the

immediate east. This site is also subject to a planning application for its redevelopment (ref. P12-02112PLA) for 50 new residential units, and at this time this application has not been determined.

Site 5 – 1-9 Alma Road

This block is owned by Metropolitan Housing Trust, comprises 10 flats and was constructed in the 1990s. It is located off Alma Road to the east of one of the 1960s maisonette blocks.

Sites 6 and 7 – Ponders End Youth Centre and Welcome Point Community Centre

These buildings are located on the south side of South Street, in between the newly built Oasis Academy and the Falcon Public House. The existing buildings are of a utilitarian appearance, reflective of the era of their design, and relate poorly to both South Street to the north – which is their primary frontage – and Falcon Road Spur to the south, which is at the rear of the buildings.

6.2.20 As noted above, an objection has been received from Metropolitan Housing Trust (MHT), who own the site referred to as 'Site 5 – 1–9 Alma Road' in the planning application. MHT highlight that their building is not of the same architectural style as other residential blocks along Alma Road or the rest of the estate – it was built in the late 1990s and comprises nine x 1 bed and 2 bed residential units, eight of which are let on assured tenancies. MHT highlight that there are no major property issues with the building and that it is a well-established, successful building which provides residents with high quality residential accommodation. The thrust of their objection to the application is that, whilst they support the principle of regenerating the Alma Estate, they do not consider it necessary to include their site within the proposals. MHT highlight that no agreement has been made between them and the applicant in respect of their site, which raises questions as to the proposed scheme's deliverability. In addition they highlight several reasons why their site should not be included in the application, including:

- The Council's North East Enfield Area Action Plan (NEEAAP, 2014) does not identify the site for regeneration. In contrast, the remainder of the blocks which comprise the Alma Estate, as depicted in NEEAAP Fig. 11.4 (AAP Policy 11.2), are shown as having been removed, the implication being these other blocks are subject to NEEAAP Policy 11.2 and not MHT's site.
- Countryside's Competition Bid Masterplan (Masterplan, July 2013) indicates that the development aspirations set out in the NEEAAP can be delivered without including MHT's site. Very little explanation is given within the applicant's planning application as to the justification for including MHT's site beyond a generic statement that it will "allow more comprehensive regeneration proposals to be developed".
- The proposal would result in the loss of housing contrary to London Plan Policy 3.4 and Core Strategy Policy 4.

6.2.21 The applicant has reviewed MHT's objection and has provided the following rebuttal:

“...the incorporation of the MHT site and the design development that followed has allowed:

- An improved building layout for blocks fronting Alma Road which relate better to the layout, scale and massing of the existing buildings on Alma Road.
- Redesign of the Alma road apartments to introduce a break in the building line and create new open space aligned with the end of Napier Road
- The creation of a vista of the Ponder End Flour Mill (and Conservation Area), a listed building and important local landmark, thereby protecting key views and conservation interests. The view of which would otherwise have been lost, based on the bid stage master plan.
- The MHT site is integral to the proposals for Phase 3B and the master plan as a whole and enables the provision of new high-quality and sustainable housing, a distinctive new frontage along the key route of Alma Road, safe and accessible green spaces, a comprehensive landscaping scheme and secure parking provision. Removing the MHT site from the application would impact the delivery of achieving comprehensive regeneration and the opportunity the proposals seek to grasp of delivering positive transformational change.”

6.2.22 In response to MHT's comments regarding the NEEAAP and whether their site is allocated for redevelopment, the applicant highlights that Figure 3.1 of the NEEAAP shows the Alma Estate master plan site, including the MHT site, as being within development site no. 4 'Ponders End Alma Estate'.

6.2.23 MHT have referred specifically to Figure 11.3 of the NEEAAP. This figure sets out the context of the site and the key issues that must be addressed in a redevelopment scheme. Policy 11.2 then sets out that the principles set out in Figure 11.3 must be reflected in the redevelopment scheme. The policy then goes on to list the principles including matters such as developing a positive street frontage to South Street, incorporating commercial mix uses adjacent to the railway station, improving Alma Road for pedestrians and cyclists and so on. The policy does not make any specific reference as to whether the MHT site should or should not be included in the redevelopment proposal.

6.2.24 Similarly, Figure 11.4 is not a masterplan for how the site should be redeveloped. It is, rather, an indication of policy principles that should be adhered to.

6.2.25 An objection has also been received from Longwood London Properties Ltd (Longwood) in relation who own the site referred to as 'Site 4 – Woodall Road' in the planning application. Longwood's objection to the application is that whilst they do not oppose the principle of regenerating the Alma Estate, it is not necessary to include the Woodall Road site to achieve this. In particular, they comment that:

- Their application proposes a 'high quality development and will regenerate the site to deliver an additional 50 residential units (retaining the 16 existing units
- The proposed footprint of the new blocks is set back from the site boundaries and does not prejudice redevelopment of adjacent land. There would be nothing to prevent the delivery of the applicant's

development proposals, including Station Square. Longwood note that Countryside has not included Longwood's site within the redline of its proposed Phase 1 development, despite it sitting directly adjacent to the redline's southern boundary, which in their view indicates that their site is not needed to facilitate delivery of Station Square (or any other part of the applicant's proposals).

- The layout and massing of both Longwood's and the applicant's proposals for the site are very similar, with buildings fronting South Street and Woodall Road. While Longwood proposes less height than the applicant along Woodall Road, heights along South Street are virtually identical. Longwood's Block A steps down from six to five to four storeys, whereas the applicant's proposes to step down here from either six storeys (as shown in the perspective view of the east elevation included on page 13 of the applicant's Design and Access Statement for the full planning application) or five storeys (as shown on Drawing No 560_OUT_PL(00)103) to four storeys.

6.2.26 Longwood has compared their proposed development to the design concepts listed in the applicant's Design and Access Statement for the outline application, and consider that their development meets all of the concepts with the one exception of the delivery of an energy centre.

6.2.27 The inclusion of Site 4 – Woodall Road is of note, given the live planning application for its redevelopment. This application was registered by the Council on 09/11/2012 and that the issues that have been identified with it have not been resolved during the course of the last two and half years gives some indication that the applicant's commitment to the development is questionable. Moreover, during the time that this application has been considered, the Council have prepared and consulted on the NEEAAP, with its examination earlier this year as set out above. As per the applicant's comments in relation to the MHT site, Figure 3.1 of the NEEAAP indicates site no. 4 'Ponders End Alma Estate' as including the Woodall Road site. The objection from Longwood has only been received prior to the final drafting of this committee report (it is dated 19th August). It has been issued to the applicant for their consideration and any response submitted by them will be reported to members via the update sheet.

6.2.28 Overall, it is considered that the NEEAAP, along with the other Development Plan documents referred to, give policy support for the redevelopment of this area. Whilst both figures 3.1 and 11.4 do not allocate specific sites or parcels of land for a particular development, it is considered that the inclusion of the additional sites is acceptable and supported in principle, as their inclusion promotes an increase in the housing numbers to be delivered through the scheme, improved community facilities and a more comprehensive approach to regeneration. The support for the overall principle of the redevelopment, including these additional sites, is shared by both the Council's Planning Policy team and the GLA.

6.2.29 As is evident from the comments of MHT, whilst these sites have been included within the red line of this outline planning application, for the sites to actually be redeveloped they will need to be acquired by the developer, requiring agreement to be reached with the relevant landowners. Should such agreement not be forthcoming then the option will be available for the Council to use its Compulsory Purchase Order (CPO) powers to secure the sites for the benefit of delivering the regeneration scheme as a whole.

Housing Supply, Density and Mix

- 6.2.30 Paragraph 48 of the National Planning Policy Framework (NPPF) reminds local planning authorities that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 6.2.31 Policy 3.3 of the London Plan sets out the target for housing supply for each London Borough. Informed by new evidence, including the GLA's 2013 Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA), the 2015 London Plan recognises that population growth in London is likely to be significantly above that which was anticipated in the original 2011 version of the Plan, and as such adopts an annual London-wide housing target for the new plan period 2015-2025 of 42,389 p.a. (up from 32,210 p.a. for the period 2011-2021) of which Enfield's annual target for the new plan period is 790 per annum(pa). (up from 560 p.a. for the period 2011-2021). As with the 2011 London Plan, it is acknowledged that even the updated target for housing delivery is unlikely to meet the actual demands as there is a significant gap between household growth projections and the identified availability of land for new housing.
- 6.2.32 The outline application proposes the phased demolition of 746 dwellings within the red line of the application, and their replacement (also phased) with 993 new dwellings, and increase of 247.
- 6.2.33 As the development would result in an increase of 247 homes, it would make a significant contribution to the Borough's target for the delivery of new residential properties.
- 6.2.34 The London Plan Policy 3.4 requires that development should seek to optimise the number of residential units, having regard to the local context, matters of design and the level of public transport acceptability. Target guidance ranges for the density of new residential development are specified in Table 3.2 Sustainable Residential Quality (SRQ) density matrix, which supports policy 3.4 of the London Plan. The density guidance ranges specified in this table are related to the site location setting, the existing building form and massing, the indicative average dwelling size, and the Public Transport Accessibility Level (PTAL) of the site.
- 6.2.35 For the purposes of the London Plan density matrix, it is considered the site lies within an urban area (this reflects the GLA's classification of the site). The site has a PTAL of 2 indicating a moderate level of accessibility to alternative transport modes. Based on Table 3.2 of the London Plan, this indicates a density range of 200 – 450 habitable rooms per hectare (hr/ha) would be suitable for the site. The proposed development would have 3067 habitable rooms. Based on the site's area of 7.9 hectares, this equates to a 388 hr/ha, which falls comfortably within the density range of the London Plan for this site, and is therefore compliant with the aforementioned policies.
- 6.2.36 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.

6.2.37 Core Policy 5 of the Core Strategy sets out the strategic targets for the types of housing to be delivered across the borough over the period of the plan. Core Policy 5 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.

6.2.38 In relation to open market housing and socially rented housing, Core Policy 5 specifies the following targets:

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%

6.2.39 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.

6.2.40 The policy goes on to states that in relation to the intermediate sector the Council will seek a range of housing types which will be determined on a site by site basis and take into account a range of factors such as development viability..

6.2.41 The following table shows the difference in the numbers of units based on their size, i.e. one, two, three or four bedrooms:

Unit Type	Existing	Proposed	Difference	% Change
1 bed	295	312	+17	6% increase
2 bed	278	497	+219	78% increase
3 bed	168	153	-15	9% decrease
4 bed+	5	31	+25	620% increase
Total	746	993	247	33% increase

6.2.42 The table indicates that there is a significant increase in two bedroom properties from the 278 presently on the site to 497 as proposed this. There would be a small increase in one bedroom properties. As can be seen from the table, the application proposes that there would be fewer three bedroom units than presently exist on the site, a decrease of 9%, but a significant increase in four bedroom properties, albeit from a low base.

6.2.43 The following table shows the mix of units for the proposed development, separating this by tenure and unit size, as set out in the planning application submission documents. The percentage figure in brackets represents the percentage of that unit type for that tenure; for example, 71 one-bed flats are proposed for social rent, which represents 35% of the total 200 for the entire scheme:

Unit Type	Social Rent	Intermediate	Private	Total
1 bed	71 (35%)	72 (36%)	169 (29%)	312 (31%)
2 bed	73 (36%)	125 (63%)	299 (50%)	497 (50%)
3 bed	43 (22%)	2 (1%)	108 (18%)	153 (16%)
4 bed+	13 (7%)	0 (0%)	18 (3%)	31 (3%)
Total	200 (100%)	199 (100%)	594 (100%)	993 (100%)

6.2.44 As can be seen from the table above the mix of units proposed by the applicant for both the private and social rented properties does not accord with Core Policy 5 of the Core Strategy. For example, the policy aims to deliver 45% of new properties with three bedrooms in the private market housing; the application proposes just 18%. Some 79% of the new private sector dwellings would be one or two bedroom properties. This is also reflected in the socially rented sector properties with 71% having either one or two bedrooms. Of the scheme a whole, 81% of the dwellings would have one or two bedrooms this with just 19% being family sized accommodation.

6.2.45 As part of their Planning Supporting Statement, the applicant has submitted an Affordable Housing Statement, which, in addition to setting out their arguments for the level of affordable housing provision for the development, also sets out the rationale for the housing mix.

6.2.46 The Affordable Housing Statement differentiates the arguments for the housing mix into the three different tenure types of social rent, intermediate and market housing. In relation to the social rent housing, the key points made in the applicant's Affordable Housing Statement are:

- The Council's Housing and Regeneration department have surveyed the residents of the existing Alma Estate and concluded that 200 Council homes are required on the redeveloped Alma Estate. The requirement for 200 council homes is based upon 38% of residents indicating in the final and second Test of Opinion in May 2012 of 528 households, that they wished to remain on the new Alma Estate.
- The Council has made a commitment to maintain the same number of family sized council homes on the new Alma Estate - 56 or 28% (56/200). Based on the Council's Allocation Scheme, housing need for 3 and 4 bedroom properties is estimated at 11%. There is, therefore, additional scope to provide family accommodation should demand for family homes increase in future.
- The Council has, however, written a Local Lettings Plan which deviates from the Council's overall housing needs provision to qualify tenants with children for larger properties with more bedrooms. Notwithstanding this the proposed provision of 56 units or 28% allows for the additional requirements of the Local Lettings Plan to be met as set out below. The proposed 200 social rent Council homes could not only meet the

- indicated level of tenants wishing to stay on the Alma Estate (38%) but meet a much higher demand.
- At the time of assessing housing need, 375 tenants remained on the estate. Including 19 social rent homes on the estate, the proposed Council housing would allow 58% of residents to stay on the new development, higher than that expected from the surveys.
 - Experience of the Phase 1a decant programme (securing vacant possession of Kestrel House and 2 maisonette blocks on Alma Road) shows that of the 128 tenants, 42 (33%) have chosen to remain on the estate. This further supports the case for 200 council units.
 - The provision of Social Housing, in terms of number and mix is based exactly upon the surveyed local need and an additional allowance has been made for larger properties than are currently required. Moreover, one of the priorities identified within Enfield's Housing Strategy 2012 – 2027 is for making best use of social rented housing stock by reducing under-occupation. This is partly in response to welfare reforms which tie housing benefit to household size and mean that under-occupying households are expected to make-up the shortfall in rent or move to a smaller property. The Council will aim to help tenants to downsize in order to release larger homes for families with children, this will ensure the housing stock is used in the most effective way.

6.2.47 This position is noted. However, the original needs survey of residents on the estate was carried out in 2012 and the application mix reflect that. There have been natural changes in the demographics of the existing residents and the application unit mix does not account for changes in the size of households. The development is subject to a Local Lettings Plan (LLP), currently under review, which may result in a greater need for larger family sized accommodation than is provided in the current application unit mix. Sentence to say: the applicant

6.2.48 In relation to the intermediate housing, it is noted that the applicant has reached an agreement with Newlon Housing Trust (Newlon), a Registered Social Landlord (RSL) who own or manage around 8,000 affordable homes, primarily in eight boroughs in north and east London, to manage the proposed intermediate properties of the development. Whilst Newlon are not the applicant, they have been extensively involved in the pre-application discussions and it is considered that the evidence that they have provided to justify the mix of intermediate housing is pertinent. The key points made in the applicant's Affordable Housing Statement in relation to the intermediate housing mix are:

- Evidence from two of Newlon's other recent developments indicate a strong demand for properties up to 2 bedrooms compared to larger properties. The profile of Intermediate purchasers on these developments in Islington and Haringey showed that only 10 out of 68 (14.7%) purchasers had children and on the other, 9 out of 136 (6.6%). Whilst a different location, this supports the case that demand for family Intermediate homes is low.
- One of the key factors identified by Newlon in determining the demand for larger homes is their affordability. The average income in Ponders End (based on 2012 data) is £25,000 to £29,000. The ability to save for a deposit and to secure a mortgage sufficient to finance 40% of a larger Shared Ownership home is therefore not possible for the majority of those in the local market. In addition, based on past experience, there is

a higher incidence of past credit problems in lower income areas, which can prohibit the potential purchaser obtaining finance.

- The Enfield Housing Market Assessment 2010 supports the case for a greater proportion of smaller housing for both Intermediate and Private homes. The assessment revealed that the absolute need for housing is greatest for smaller dwellings within Enfield. The research includes household projections which show that there is expected to be a significant increase in one-person households (a growth of 33% to 2026) combined with an aging population profile as the numbers of 25-44 year olds falls markedly and there is a significant rise in those aged 65 and over. There will be a modest fall in the number of households with children to 2016, after which the decline may be more marked.

6.2.49 In relation to open market housing, the key points made in the applicant's Affordable Housing Statement are:

- Countryside are currently engaged in three regeneration developments in Enfield and this has led to them developing 'a clear understanding of the local housing market'. In particular, the applicant highlights their development at Silverpoint (approximately 3 miles from this site, and also known as Highmead), where 37% of the 3-bed units have been sold, compared to 80% of the 1-bed units and 51% of the 2-bed units (figure at 9th January 2015 when the indicative proposals were presented to the GLA as part of the pre-application advice request). The applicant's position is therefore that the market demand for larger family sized properties in this area is limited, whilst the demand for 1 and 2-bed flats is much higher. The applicant highlights that their proposed housing mix reflects this understanding of the local market.
- Countryside's research indicates that affordability is a key driver for the demand for the smaller flats and this is in a period of Help To Buy, from which the proposed development may not benefit. This affordability point is particularly relevant for Ponders End, with average incomes of between £25,000 to £29,000.
- The proposed master plan design focusses the smaller homes in and around the railway station in the landmark building. The other areas of the estate are more appropriate for the larger homes, where the proposed provision includes 116 houses and maisonettes (all tenures.)

6.2.50 The applicant concludes that they are confident that the proposed mix of housing across all tenure types is appropriate to meet the demand for property in Ponders End, providing homes "which are affordable, well designed and creating a balanced mixed community. The selection of housing allows for families to grow and stay on the Alma Estate."

6.2.51 The applicant notes that the average values for flats in Enfield as a whole is £254k versus £414k for Greater London, i.e. 63% lower. Moreover, the average price for a flat in Ponders End is £189k (35% lower than the remainder of Enfield.) Given this, the applicant concludes that:

"...in order to deliver successful estate renewal at Alma, an area of low property values and incomes, and to overcome the additional costs of significant demolition, decanting and rehousing residents and the provision of new community facilities, the mix of housing has to respond to the assessed housing needs in order to have a marketable and financially viable development. We are confident that the proposed mix of housing responds to

these needs and supports the financial viability of this challenging project and will assist in securing its delivery to the benefit of all.”

6.2.52 The applicant's argument is, in essence, that the mix of the housing proposed reflects that required for the specific tenure group taking into account the individual circumstances of this development and the broader constraints and socio-economic factors of the area. So, the proposed social rent housing mix is driven in part by the Council's Housing/Regeneration Teams when considering the decant programme for the development which is based on surveys undertaken and the Local Lettings Plan. Similarly, the evidence of Newlon in relation to the intermediate homes and the applicant themselves in relation to the open market homes is that there is a clear demand for smaller properties over larger ones, and hence this is reflected in the planning application. And linked to this, there is the issue of the financial viability of providing larger accommodation on this site when one takes into account the additional costs that are associated with a large-scale regeneration scheme.

6.2.53 The GLA's Stage 1 response to the planning application is pertinent to this assessment and is set out in full below:

“Having considered the illustrative schedule of accommodation presented for the regeneration masterplan, GLA officers note that the scheme would reprovide an excellent range of dwelling typologies (ranging from one to five-bedrooms) and deliver homes of more generous spatial proportions compared to the existing stock. Furthermore, it is noted that the scheme would maintain the number of family sized social rented homes (56 units) as part of a 4% overall increase in affordable family-sized housing at the estate. Accordingly GLA officers are of the view that the proposed provision of family housing appropriately responds to decant requirements, and the mix overall is supported in accordance with the principles of London Plan Policy 3.8.”
(Paragraph 38)

6.2.54 The Council's Planning Policy team have reviewed the application and they concur that when taking account of overall regeneration objectives the proposal would re-provide a range of dwelling typologies of good spatial proportions that will deliver a sustainable mixed and balanced community and that in order to achieve regeneration of this scale it is not possible to meet all of the mix and tenure requirements set out in the policies referred to above (Core Strategy Policy 5 and London Plan Policy 3.9) without compromising these (the overall regeneration objectives).

6.2.55 Insofar as the viability of the scheme is concerned, the applicant has submitted a Financial Viability Appraisal that covers both this detailed application and the outline application. The report concludes that the neither application can viably deliver more affordable housing or an alternative housing mix which might more closely match policy requirements. The applicant's appraisals of both schemes show a current deficit. The report further recommends that the Section 106 Agreement contributions should be reviewed in light of the findings.

6.2.56 The Council has instructed an independent consultant to review the applicant's Financial Viability Appraisal. The Council's consultant was specifically requested to advise on whether a) the development could support a more policy compliant housing mix in terms of unit size and b) whether the proportion of affordable housing could be increased.

6.2.57 In relation to this application, the Council's consultant has concluded that:

- *"The applicant's appraisal shows that the outline scheme currently generates a deficit of -£7,850,887. Our review of applicant's consultant's financial appraisal shows that the value inputs appear largely reasonable*
- *The outline application provides for 40% affordable housing reflecting a 50:50 split of social rent and intermediate housing (as opposed to the Enfield policy which seeks a 70:30 split of tenure). Furthermore, the proposed tenure mix is biased towards provision of smaller units. We have re-run an appraisal for the outline application and firstly adjusted the affordable housing split to allow for policy compliance (70:30 in favour of social rent). We have also adjusted the tenure mix to an approximate reflection of policy compliance. On this basis, we can see that the scheme would generate a considerably higher deficit of circa £25.5 million when compared to the currently proposed mix which generates a deficit of £7,850,887. This analysis suggests that a move towards policy compliance from the proposed mix would not be financially viable."*

6.2.58 It should be noted that the viability appraisal relates to a particular point in time. The deficit shown at this stage is a risk that Countryside has accepted as they anticipate that property values will rise over the entirety of the development period and that the scheme is therefore viable. This risk is borne by Countryside and not by the Council.

6.2.59 Having regard to paragraph 173 of the NPPF which is clear that decision makers should have full regard to the viability and deliverability of a development when assessing planning applications, the advice of the Council's consultant is unequivocal in relation to the ability of the proposal to be able to deliver a more policy compliant housing mix. This is, clearly, disappointing, but given this, the application's non-compliance with the policies of the Development Plan is considered to be outweighed by the development viability factor. As such, it is the case that based on the information submitted as part of the proposed application the 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 at the expense of family-sized homes, 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. On balance therefore it is considered that the application is acceptable with regard to the proposed housing mix.

Affordable Housing – amount and tenure split

6.2.60 Policy 2.14 of the London Plan, instructs Boroughs to prepare integrated spatial policies for regeneration areas, sets out that 'these plans should resist loss of housing, including affordable housing, in individual regeneration areas unless it is replaced by better quality accommodation, providing at least an equivalent floorspace.'

6.2.61 The London Plan policies 3.9 – 3.13 sets out guidance on the delivery of new affordable housing. Policy 3.9 promotes mixed and balanced communities and requires that new developments should encourage a good mix of housing tenures thereby reducing social deprivation. Policy 3.10 of the London Plan defines affordable housing as social rented, affordable rented and

intermediate housing (including shared ownership/equity and intermediate rental products etc).

6.2.62 The London Plan policy 3.12 promotes the negotiation of affordable housing on residential and mixed use developments and in particular explains how boroughs should seek to secure the maximum reasonable provision of affordable housing on qualifying sites subject to financial viability, the availability of funding and other site specific and local circumstances and priorities. Boroughs should evaluate financial appraisals submitted alongside planning applications rigorously.

6.2.63 London Plan Policy 3.14 resists the loss of housing, including affordable housing, without its planned replacement at existing or higher densities, with at least equivalent floorspace. Paragraph 3.82 which supports this policy is particularly pertinent to this application, as it relates to estate renewal, and sets out that:

“Estate renewal should take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area (see Policy 3.9), and the amount of affordable housing intended to be provided elsewhere in the borough. Where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing.”

6.2.64 The Mayor’s Housing SPG provides general advice in support of Policy 3.14 and makes clear that where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least equivalent floorspace on site. In support of this approach and where such improvements are delivered, the SPG clarifies that an assessment of the quantum of reprovision in estate renewals can be made on a number of dwellings or habitable room basis. In relation to affordable housing policies, the tone of the SPG is to further emphasise the need for policies to be applied in a manner that maximises output and, having regard to viability, to encourage not restrain housing development.

6.2.65 Policy 3.9 of the London Plan, which is referred to above, is also relevant to the circumstances of this site and development. The policy sets out the strategic view of the Mayor in relation to encouraging mixed and balanced communities, and in particular highlights that a more balanced mix of tenures should be pursued in neighbourhoods where social renting predominates and there are concentrations of deprivation.

6.2.66 London Plan Policy 3.11 seeks to ensure that at the strategic level 60% of affordable housing provision is social housing, and 40% intermediate. The definition of affordable housing as set out in the NPPF is “Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.” London Plan Policies 3.8, 3.9 and 3.11 and the Mayor’s Housing SPG all emphasise that the priority for affordable housing is family sized dwellings (defined as three bedrooms or more).

6.2.67 At the local level, Core Policy 3 of the Core Strategy sets out that for sites delivering ten units or more, a target of 40% of these should be for affordable

housing. The policy states that affordable housing should be delivered on site unless in exceptional circumstances, and that the mix of affordable housing should reflect the need for larger family units as set out in Core Policy 5, with a target of 70% of the affordable provision for social rent and 30% for intermediate homes. The policy also sets out how individual applications will be assessed insofar as taking into account their specific constraints and their viability etc. The wording of this part of the policy is set out in full below:

“In order to determine the precise number of affordable housing units to be delivered for each development, the Council will plan for balanced and sustainable communities and work with developers and other partners to agree an appropriate figure, taking into consideration site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site. The Council will monitor the implementation of these targets and identify any need to review them via the preparation of the Annual Monitoring Report.”

6.2.68 Core Policy 4 of the Core Strategy sets out the Council’s approach to housing renewal, noting that the Council will use its development management powers to prevent the loss of all homes, including affordable homes. It then goes on to set out that an Estates Investment Management Strategy will be undertaken to inform the future management and priorities for investment across the Council’s own housing stock. DMD Policy 4 of the Development Management Document states:

“Development involving the net loss of affordable housing and of social rented accommodation in particular will be refused unless the net loss arises from the managed replacement of housing, planned through estate renewal programmes or adopted masterplans/regeneration strategies, and one of the following criteria are met. The development must:

- a. Achieve a more appropriate mix of housing types and tenures in line with housing needs across the borough and the delivery of mixed and balanced communities at the local level; or
- b. Not result in overall loss in the total number of habitable rooms.”

6.2.69 The 746 existing units are either owned by the Council (social rent) or are in private ownership (Market). The existing mix of social rent and market units, along with the percentage of the units which are in the social rent category (e.g. so 85% of the total existing 1-bed units are for social rent at present) is set out in the following table:

Unit type	Social rent	Market	TOTAL	%
One bedroom	252	43	295	85
Two bedroom	248	30	278	89
Three bedroom	52	116	168	30
Four bedroom	4	1	5	80
TOTAL	556	190	746	74

6.2.70 As can be seen from the table above, the clear majority of the existing dwellings, some 74%, are Council managed socially rented, with the remainder being private market units. The reason for the very high proportion of affordable housing units is that the estate was originally developed solely for Council tenants but over time and number of residents exercised their

right-to-buy their homes, and therefore this accounts for the market properties within the red line of the site. The Mayor's Housing SPG sets out that such right-to-buy properties are now considered to be open market properties, and so are not classed as affordable. It is also noted that there is also a larger proportion of one bedroom units, with two bedroom units also being significantly higher than three and four bedroom units.

6.2.71 The following table sets out the proposed schedule of accommodation for the outline application:

Unit type	Social rent	Intermediate	Market	TOTAL
One bedroom	71	72	169	312
Two bedroom	73	125	299	497
Three bedroom	43	2	108	153
Four bedroom	12	0	18	30
Five bedroom	1	0	0	1
Total units	200	199	594	993
Total floorspace	14,981m ²	12,736m ²	43,773m²	71,493m²
	27,720m²			

6.2.72 As can be seen from the table above, the total number of affordable units would be reduced from 556 to 399, a reduction of 29% in total unit numbers. The level of affordable housing floorspace would be reduced from 34,147m² to 27,720m², a reduction of 19%. However, as a percentage of the total number of units across the site as redeveloped, the proposal would deliver 40%, or 39% in terms of total residential floorspace.

6.2.73 The application proposes 399 affordable properties out of 993 total and this would, therefore, be consistent with Core Policy 3 of the Core Strategy in that 40% of the proposed units overall would be affordable (and of course individual phases may be higher or lower). However, the application would be contrary to the London Plan Policy 3.14 part B in that it would result in an overall net loss of affordable housing (of 157 units, which equates to 40.2% of the total). Part B of the London Plan Policy 3.14 does allow for the loss of affordable housing if it is replaced at higher densities with at least equivalent floorspace, which would not be the case here (see above).

6.2.74 At a local level, Policy DMD4 of the Development Management Document is more nuanced in that whilst it also seeks to resist the net loss of affordable housing where "the net loss arises from the managed replacement of housing, planned through estate renewal programmes or adopted masterplans/regeneration strategies", which is the case here. The policy also requires one of two criteria to be met, which is that the proposed development achieves a more appropriate mix of housing types and tenures in line with housing needs across the borough and the delivery of mixed and balanced communities at the local level; or there is no overall loss in the total number of habitable rooms.

6.2.75 Insofar as considering the extent to which the estate renewal plan is concerned, the applicant has highlighted the Dujardin Mews development that was granted planning permission in 2013 and is currently under construction in close proximity to the application site, and that this development must be

considered in the context of the overall provision of affordable housing. It is recognised that Dujardin Mews ‘was always intended to part of the Alma Regeneration project in dealing partly with the net loss of affordable housing and providing a decant site for existing Alma residents who wanted to remain in the area or be double decanted once the estate is redeveloped.’

6.2.76 Accordingly, the applicant has provided a comparison of the different development scenarios which include the Dujardin Mews development and set out the resulting level of affordable housing. This is set out in the following table:

		All affordable	All units
Estate baseline	Units	556	746
	Floorspace (m ²)	34,147	48,027
	Habitable rooms	1532	2294
Outline application	Units	399	993
	Floorspace (m ²)	27,720	71,493
	Habitable rooms	1184	3067
Dujardin Mews	Units	38	38
	Floorspace (m ²)	3,644	3,644
	Habitable rooms	160	160
Outline application + Dujardin Mews	Units	437	1,031
	Floorspace (m ²)	31,361	75,137
	Habitable rooms	1344	3227
Net change against baseline	Units	-119	+285
	Floorspace (m²)	-2,783	+27,110
	Habitable rooms	-188	+933

6.2.77 Therefore, taking into account the consented development at Dujardin Mews, the loss of affordable housing units is reduced from 157 to 119, the loss of affordable housing floorspace is reduced from 6,427m² to 2,516m² and the loss of affordable housing habitable rooms is reduced from 348 to 188. As such, when considering the proposed development in conjunction with the development at Dujardin Mews, whilst there would still be a net loss of affordable housing, the level of reduction would be lessened.

6.2.78 The comments of the GLA in relation to the re-provision are of particular note here. Their analysis of the situation notes that whilst there is a notable loss of affordable housing in units terms, reflecting on the information in the table above, the actual loss in terms of total floorspace is much lower. The GLA note that:

“This underlines that fact that the affordable homes being provided would be of more generous spatial proportions than the existing stock at the estate. Furthermore, as discussed in paragraph 30, the overall mix of housing proposed is welcomed, and represents a genuine step change in housing quality over the existing situation.” (Paragraph 23)

6.2.79 Furthermore, the net loss of affordable housing must be considered in the context of the wider regenerative benefits and comprehensive approach to redevelopment of the estate and additional sites that is proposed as part of the application. It is clear that the replacement affordable housing would be of a significantly higher standard than the existing stock and overall the mix

between private housing and affordable (which will itself be split into different tenures of social rent and intermediate) would lead to a more sustainable place and balanced community. The proposed scale of regeneration for this area and the cumulative impacts and benefits (such as the replacement and upgraded community facilities, gym and medical centre) must also be considered, including affordable housing provision. Again, the GLA's analysis of this is of particular note:

“Noting the proposed position with respect to the net loss of affordable housing units (and following pre-application discussions with GLA officers), the applicant has submitted details on the proposed local lettings policy and decant strategy, as well as information on additional affordable housing coming forward locally. Based on the information available GLA officers understand that, in response to consultation, 37% of tenants at Alma Estate expressed the desire to remain following redevelopment. The Council is committed to allowing all tenants the right to return, and it is acknowledged that the 200 social rent units proposed as part of the regeneration masterplan would meet the current level of demand. Nevertheless, Enfield Council anticipates that the proportion of residents wishing to stay in the neighbourhood may rise as tenants come to more fully appreciate the benefits of the proposed regeneration. Accordingly, the contribution of neighbouring schemes such as Dujardin Mews (38 affordable units), Electric Quarter (62 affordable units), Viridian Housing (50 affordable units) and other Ponders End sites within the emerging North East Enfield Area Action Plan are likely to be important both in terms of recouping the proposed net loss of units at Alma Estate, and responding to decant requirements.

Given the scale, ambition and complexity of the proposed regeneration scheme, the difficulty of achieving a like for like replacement of affordable housing is appreciated. Accordingly, having regard to the matters discussed above, and the quality of the replacement housing provision (refer below), GLA officers are of the opinion that the loss of affordable housing would be outweighed by the wider regenerative benefits of the scheme - subject to demonstration that the scheme would deliver the maximum reasonable amount of affordable housing (discussed below).” (Paragraphs 25 and 26)

6.2.80 As such, it is considered that whilst the proposal would be in conflict with part B of Policy 3.14 of the London Plan, it can be considered to be in conformity with Policy DMD4 of the Council's Development Management Plan, as the proposed development would achieve a more appropriate mix of housing types and tenures and the delivery of mixed and balanced communities at the local level. The regeneration benefits of the proposal which would include re-provided affordable housing of a higher quality than that which presently exists, a better and more balanced mix of housing, plus the delivery of the replacement community and youth centre and a new medical centre, are considered to carry significant weight in planning terms such that they outweigh the conflict with the Development Plan policy.

6.2.81 However, the GLA's qualified support for the proposed level of affordable housing is subject to the caveat that policy 3.14 of the London Plan requires that the maximum level of affordable housing provision is achieved having regard to the financial viability of the development. The GLA are also seeking an overage provision to be built into the Section 106 Agreement as per their comments below:

“GLA officers are of the view that this scheme has significant place-making potential, and that this is likely to feedback into increased value in the later phases. Accordingly, and notwithstanding the findings of the viability review, the Council is encouraged to consider using the section 106 agreement to secure an upwards only affordable housing review of future phases.”

6.2.82 Insofar as the affordable housing tenure split is concerned within the 399 units proposed, this would be 50% social rent and 50% intermediate, whereas Core Policy 5 of the Core Strategy sets out a target of 70% of the affordable provision for social rent and 30% for intermediate homes. This tenure split is reflected in Policy DMD1 of the Development Management Document which also notes that negotiations on individual applications will take into account the specific nature of the site, development viability, the need to achieve more mixed and balanced communities, particular priority to secure affordable family homes which meet both local and strategic needs, available funding resources and evidence on housing need. London Plan Policy 3.11 seeks a slightly different ratio of 60% of the affordable provision for social rent and 40% for intermediate homes but it should be noted that this is a pan-London objective, rather than a site specific target. Of the 199 intermediate homes within the application, 126 will be provided by Newlon Housing Trust as shared ownership. Of the remaining 73 homes the tenure has not yet been agreed between the applicant and the Housing Development and Renewal Team. There is a requirement for flexibility on tenure based on a review of need on a phase by phase basis and this will need to be reflected in the S106 Agreement.

6.2.83 The applicant has confirmed that they recognise that the housing mix and tenure may be subject to change on a phase by phase basis over the course of the development, and they therefore support flexibility being introduced to the consent via the Section 106 Agreement to address any amendments required to the housing mix and tenure by either the Council or themselves. To this end, the applicant has formally agreed to the principle of a review mechanism although the precise wording and configuration of this is yet to be agreed and so is subject to further discussion. It should be noted that the Section 106 Agreement will require the delivery of the affordable housing units/floorspace as a minimum, with any changes resulting from the review mechanism being in relation to the tenure mix and / or unit sizes and not resulting in less floorspace being delivered.

6.2.84 Whilst it is accepted that the proposed tenure split does not directly accord with London Plan Policy 3.11, Core Strategy Policy 3 and NEEAAP Policy 5.1, the NEEAAP does acknowledge the viability issues with the North East of the Borough allows for flexibility to support the delivery of affordable housing. The Mayor's Housing SPG sets out that the replacement of social rented units by intermediate provision can be acceptable if it improves the range and types of provision in an area. In this context, and given the characteristics of the site and its surroundings, the provision of shared ownership units within the affordable element of the proposal is acceptable and at a higher rate than the planning policies envisage. This is, however, driven by the individual circumstances of the site including the development viability as set out above, and in particular the need to achieve a more mixed and balanced community, along with the London Plan's encouragement for a mix of tenures in estate renewal schemes, given that the proposal comprises the redevelopment of an existing estate.

6.2.85 The GLA support the proposed tenure split of the affordable housing, also noting that the NEEAAP seeks to allow a degree of flexibility with respect to tenure splits in this part of the Borough in order to maximise affordable housing delivery and support mixed and balanced communities. The GLA has commented that the proposed tenure split would:

“...genuinely enhance the range and balance of tenures at the estate in accordance with the broad aims of London Plan Policies 3.9 and 3.11. Accordingly, GLA officers are of the view that the proposed tenure split is acceptable in strategic planning terms.” (Paragraph 28)

6.2.86 The applicant has submitted a financial Viability Assessment which has been tested on behalf of the Council by an independent consultant. The results of the review of the applicant's financial Viability Assessment are referred to in relation to the assessment of the housing mix in the report above and are clear that the scheme's viability does not support this being changed at this stage. This argument applies equally to the affordable housing at this stage. Accordingly, it is considered that the applicant has demonstrated at this time that the scheme is providing the maximum reasonable affordable housing. However, given the long term nature of the proposed development which will be built out over a period of years, it is considered that it is appropriate that a review mechanism is included within the Section 106 Agreement. This review mechanism would allow the viability of scheme to be tested on a phase by phase basis to ascertain whether as the development progresses there is opportunity to increase the level of affordable housing and adjust the mix to reflect changing need.

Non-residential uses

6.2.87 London Plan Policy 3.7 states that large residential developments should, where necessary, coordinate the provision of social, environmental and other infrastructure. London Plan Policy 4.7 Retail and Town Centre Development states that the scale of proposed retail, commercial, culture and leisure development should be related to the size, role and function of the town centre. The London Plan promotes affordable shop units suitable for small independent retailers and service outlets to strengthen and promote the retail offer, attractiveness and competitiveness of town, district and local centres (policy 4.9).

6.2.88 London Plan Policies 4.8 *Supporting a Successful and Diverse Retail Sector and Related Facilities and Services* and 4.9 *Small Shops* point to the value of local facilities/services, markets and small shops as part of vibrant, diverse retail sector. The importance of diverse retail and related activities is amplified further in the Mayor's *Town Centres* SPG23 (2014). London Plan policy 7.3 highlights various 'Designing Out Crime' aspirations, and in particular identified the design should encourage a level of human activity that is appropriate to location, incorporating a mix of uses where appropriate to maximise activity throughout the day and night creating a reduced risk of crime and sense of safety.

6.2.89 Policies 11.1 and 11.2 of the NEEAAP promote the relocation of all commercial uses adjacent to Ponders End station in order to benefit from the high footfall generated around the station through redevelopment of the estate. The existing retail, commercial and community facilities are currently

located within the South Street Local Parade, as designated on the adopted policies map.

- 6.2.90 The application proposes the re-provision of these facilities around the 'Station Square', a new civic space in place of the existing railway station car park, and is considered to be one of the key benefits of the proposal. The new civic space would be created through a 439 m² gym set over two floors on the north side, which would be delivered as part of the first phase of the development, and a medical centre (minimum of 532 m² to maximum of 833 m²) on the south side that is proposed in phase 2A (the second phase). There will be new retail within Station Square and the rest of the retail units will be located along the new perimeter blocks that will face onto South Street.
- 6.2.91 The Council's Planning Policy team have assessed the proposals and have advised that the increase in retail floorspace is minimal (just 157 m²) and will not materially change the designation or adversely impact Ponders End High Street (the nearest local centre). As such, it is considered that the proposed town centre uses provide supporting infrastructure for the uplift of the number of homes through regeneration of the estate.
- 6.2.92 London Plan policy 3.17 states that development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. The proposed medical centre, which is proposed as part of the second phase of the development, would be located on the south side of the new Station Square (which would be delivered as part of the first phase of the development) and would be an important piece of new local infrastructure. The proposed medical centre would offer both existing and new residents access to brand new General Practitioners surgery and other related healthcare facilities and its location as part of the new Station Square would help to create a new civic area here in conjunction with the other non-residential uses and of course the proximity to Ponders End train station. However, it must be acknowledged that delivery of the medical centre would also require the support of the NHS and for them to sign up to the delivery of services from the premises provided.

6.3 Design

Layout, mass, bulk and height, including Design Code

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

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

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

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes

beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment. (Para 61)

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

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

- 6.3.2 The London Plan Policies 7.4B and 7.6B set out the design principles that all boroughs should seek to ensure for all development proposals. The London Plan Policy 7.4B states, inter alia, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. The London Plan Policy 7.6B states, inter alia, that all development proposals should; be of the highest architectural quality, which complement the local architectural character and be of an appropriate proportion, composition, scale and orientation. Development should not be harmful to amenities, should incorporate best practice for climate change, provide high quality indoor and outdoor spaces, be adaptable to different activities and land uses and meet the principles of inclusive design.
- 6.3.3 The report above notes that the density of the development corresponds with the London Plan policy. Nevertheless, in order to properly address the broader policy requirements for new development, the proposals need to demonstrate a sensitivity to and consideration of the context, both local and more widely, in its design, materials and composition. Consistent with the core principles of the London Plan, the Core Strategy and the Development Management Document, well considered, high quality, design-led development is central to achieving a balanced and sustainable development. Core Policy 4 of the Core Strategy sets out that new developments will be of a high quality design and in particular that new housing developments should take account of the design and construction policies and sustainable design and construction guidance as set out in the London plan. 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.
- 6.3.4 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 from its inception. Having said that, it should be borne in mind that the application is in outline with all matters reserved.

6.3.5 The Council's Urban Design Officer has been extensively involved since the inception of the project and has provided detailed comments and feedback to the applicant in response to the emerging designs throughout the pre-application process. He has also reviewed the application submission documents and provided analysis on these; this has resulted in the applicant responding to these comments with various documents being amended during the course of the application.

6.3.6 Whilst noting that the application is in outline, a number of the documents submitted by the applicant including the parameters plan and the building heights plan would tightly define the future reserved matters applications. The main parameters plans submitted are set out as follows, along with a short summary of any changes that have been made to them during the course of the application:

- Development zones (plan no. 560_OUT_PL(00)101 Rev A) – this plan sets out an indicative building line for the development proposed that corresponds to the illustrative masterplan. However, as the name suggests, this line is indicative and is not fixed, but the development zones of where the building can be constructed within the site is denoted in blue shading. This means that the footprint of a building proposed by any future reserved matters application will need to be contained within the development zone identified. This plan has been amended during the course of the application to include specific note that requires a 'Minimum 2m defensible space to be provided to all active residential frontages.'
- Phasing plan (plan no. 560_OUT_PL(00)102 Rev B) – shows the proposed phasing of development across the site, and this plan has been amended during the course of the application to reflect the updated phasing schedule as referred to in paragraph 2.5.
- Building heights (plan no. 560_OUT_PL(00)103 Rev A) – shows the maximum heights of buildings across the site. This plan has been amended during the course of the application to ensure that the building within Phase 3A closest to 47 Scotland Green Road would have a maximum height of two storeys at its closest point, where previously this has been indicated as three.
- Main development use (plan no. 560_OUT_PL(00)104 Rev B) – identifies the location of the non-residential uses within the site, for example the location of the proposed gym on the ground and first floor of the landmark building. This plan has been amended during the course of the application to correct a mistake on the original where the vacant space in the colonnade of the landmark building was indicated as being part of the gym.
- Strategic landscape (plan no. 1405_OUT_PL019 Rev A) – shows the proposed areas of open space, landscape planting, and trees to be retained.

6.3.7 The illustrative masterplan submitted with the application indicates how the proposed development could take place. This plan is illustrative and does not inherently indicate the final form of development proposed as all matters are reserved for future consideration. However, having said this, when considered

in the context of the parameters plans referred to above, there is limited opportunity for significant diversion away from this masterplan. The masterplan is set out below :



6.3.8 The applicant's Design and Access Statement sets out the key principles that have informed their design approach for the redevelopment, which are:

- Totally transform the Alma Estate.
- Re-distribute density with an alternative massing strategy that re-distributes homes from the existing tower blocks across the site into lower scale buildings - with a landmark building in an appropriate location next to the station.
- Ensure all homes are close to a green space by arranging buildings around a series of communal green spaces with different characters, including communal gardens and play spaces.
- Connect streets together into a conventional street network, with clearly defined fronts and backs, and defined routes for pedestrians and vehicles.
- Reinvent South Street as a hub for the local neighbourhood.
- Create a new arrival to Ponders End.
- Provide a range of different building types in different tenures to create a mixed community.
- Strengthen connections to wider area.

6.3.9 It is considered that the proposed masterplan represents a positive design solution to the development of the site. The masterplan uses a series of perimeter blocks to create strong frontages to main streets including Alma Road and South Street, as well as the new north-south streets that would be created linking South Street and Napier Road. New public spaces in the form of Station Square adjacent to the railway station and along South Street that are proposed would serve to mark a step-change in the quality of the public realm in this area. The layout of buildings also works well to support a clear delineation between public and private space.

6.3.10 In terms of the urban structure and grain of the proposed layout, the proposal successfully connects to existing routes, including the reinstatement of a connection along Napier Road, which will help to integrate the former estate in to the surrounding community. The open spaces are located in logical positions: The main open space connects Curzon Avenue with the new Academy; landscaping on South Street reinforces the green link to the Lee Valley Regional Park; and smaller spaces are distributed throughout the site, providing opportunities for local play. The proposals generally follow the principles of good urban design creating a distinct character, a legible environment that is easy to move through, consistent building lines that help define public and private spaces, a high quality public realm and an appropriate mix of uses.

6.3.11 In relation to the location of the affordable housing within the masterplan, the applicant has set out that it is their approach to mix the tenures as much as possible. However, in relation to the potential for 'pepper potting' of the proposed houses for social rent (as opposed to the flats, which for predominately management reasons have to be accessed and separated from the other tenures), the applicant highlights two factors that have restricted this to some extent:

- The housing needs/decant requirement, which puts social rent houses in specific phases, and;
- The length of houses which is different in market and social rent. Different length houses are generally required to meet alternative briefs for each tenure. For example, the social rent houses need to adhere to

strict area targets, whereas market houses need to incorporate en-suite bathrooms. Tenures are therefore clustered to provide a constant elevation at the rear, rather than pepper potted which would create steps in the facade.

6.3.12 In terms of the height and massing of the proposal, this is set out on a building heights plan and the applicant's Design and Access Statement indicates how they have considered this matter and the principles which drove the design:

- Opportunity for six-storey buildings on South Street reflecting importance of route and addressing new public realm;
- Five-storey apartment buildings also on Napier Road (inter-sector route) facing green space;
- Massing stepping down to three-storey houses and four-storey apartment buildings where meeting existing suburban housing;
- Small scale streets linking South Street and Napier - three and four-storey houses and maisonettes;
- Opportunity for density around train station including a landmark building to signpost Ponders End railway station;
- A taller building against Lea Valley Road – high visibility to a major transport connection.

6.3.13 The proposed building heights shown are considered acceptable as they would enclose streets and spaces well and the two taller buildings offer appropriate landmarks for the station and one of the main east-west routes in/out of the borough.

6.3.14 Of most concern are the proposals for phase 2A(II), as they do not at this stage provide the improvements necessary to support residential development along Falcon Road Spur.

6.3.15 This part of the outline application, which currently consists of the Ponders End Youth Centre and Welcome Point Community Centre, were identified to be brought into the outline planning application at a relatively late stage in the pre-application process. Whilst the principle of re-developing these sites with brand new and up-to-date facilities is wholly supported, along with residential development in this location, there are concerns about how the ground floor southern frontage would be lined, with the active frontage onto Falcon Road Spur needing to be maximised. Suggested changes include moving the parking into the block (at least in part) with entrances to residential units (split over 2 levels) directly onto the street, preferably with a habitable room at ground floor, and the provision of defensible space. A more desirable solution would be for some parking associated with the development to be accommodated in the remodelled Falcon Road Spur, particularly parking for non-residential units (see later). Revised drawing 560_SK_266 also shows that the frontage will be further deadened by locating access to residential cores within the courtyard only. While dual access may be acceptable, a proper entrance needs to be located on Falcon Road Spur in order to help activate the space.

6.3.16 The applicant has responded to these concerns, stating that:

- *"In terms of the final masterplan, we have proposed residential at upper floor levels along the entire site boundary to introduce maximum*

overlooking to the Spur. Following discussions with officers the design code proposes that these residential units are deck accessed in order to provide homes with dual aspects onto the Spur and courtyard behind.

- *We have also proposed communal residential entrances facing onto the Spur in order to create an active frontage. These communal entrances supplement others which address the sites primary frontage onto South Street and give residents the option of entering from either side.*
- *Further active frontage onto the Spur is created by the Youth Centre which is located at ground floor level at the east of the site – with a clause added to the Design Code specifying it should provide entrances and windows onto the Spur.*
- *Given the dominance of cars on the Spur, we have proposed car parking for residents concealed from view underneath the block at ground floor level. Specific clauses in the Design Code control the design of its enclosure to ensure quality and consistently with overall building design.*
- *In terms of landscaping, the reconfigured car parking spaces provide opportunity to introduce trees and landscaping in front of the new building. As requested, we can also introduce a planting strip along the building perimeter to provide additional greenery.*
- *We believe proposals balance the need to provide a suitable residential environment with improvements to the Falcon Road Spur and would significantly contribute to activating the Spur both as an individual scheme and also as part of any wider proposals in the future incorporate surrounding sites, such as DuJardin Mews.*
- *We also wish to highlight that proposals do not prevent a future scheme being brought forward by the Council to amend the layout of the Spur.”*

6.3.17 This matter is clearly of significant concern to ensure that the most appropriate form of development would take place here. The applicant's response to the concerns raised are noted. The comments of the Oasis Hub Hadley are also noted. It is understood that Oasis Hub Hadley operate a range of community based activities from the Oasis Academy, Ponders End Youth Centre and Welcome Point Community Centre. Oasis Hub Hadley has made a number of very detailed comments with regard to the facilities that should be provided as part of the re-provided community facilities. One of the main points made by Oasis Hub Hadley is that the youth centre and community centre should be merged into a single larger building so as a greater range of facilities can be provided in this building.

6.3.18 Ultimately, in terms of establishing that the principle of the redevelopment of this part of the site for a combination of non-residential community uses of a size and scale that is commensurate with the existing facilities, and with residential use on this part of the site as well, the application is considered to be acceptable. Clearly, should this outline permission be granted, when a reserved matters application is submitted regard will need to be had to the comments and concerns that have been identified. Similarly, the applicant's point regarding the control of the site (i.e. it is owned by the Council) is taken and therefore this will require a collaborative approach to ensure the highest possible quality of development to come forward. Whilst it may be appropriate to re-provide the community facilities as a single building rather than a separate youth centre and community centre, this decision will need to be made when the detailed designs for this part of the site are being prepared. Whilst those designs will need to have regard to the parameters established by this outline planning permission in terms of the uses, development zone and building heights, part of the point of such an outline

consent is that it allows flexibility to be exercised in terms of the future development of the site.

6.3.19 As this is an outline planning application the applicant has submitted a Design Code which forms part of their Design and Access Statement. The purpose of the design code is to establish a number of key principles which will inform the future phased development and see reserve matters applications come forward.

6.3.20 The Design Code submitted sets out the following:

- Reinforces and explains the design principles underlying the indicative master plan and Outline Planning application for the Alma regeneration;
- Describes the different areas within the whole masterplan and the expectations for the design of buildings and the public realm;
- Outlines general standards for building types and open spaces common to all phases of development;
- Describes the expected architectural approach and material palettes.

6.3.21 The applicant's Design Code sets out that their vision for the redevelopment of the site is create a 'new neighbourhood with its own distinct identity and character'. Whilst in terms of the delivery of residential units the development is considered to be relatively large, the site as a whole is not as it is set within a constrained urban area. Accordingly, the applicant intends to create a common character across the development, but their design Code does identify five areas where 'there will be subtle variations in character in response to local context, layout, scale and building forms.' These areas are: South Street; Alma Road; Scotland Green Road; Local streets; Woodall Road and Falcon Road spur. Overall, it is considered that the Design Code, which has been updated as part of amendments to the submitted Design and Access Statement during the course of the application, is appropriate for the development.

Heritage impacts

6.3.22 The NPPF definition of designated heritage assets includes statutory listed buildings, registered parks and gardens and conservation areas. When considering whether to grant planning permission for a development affecting a listed building (including developments affecting its setting), the local planning authority has a statutory duty to have special regard to the desirability of the preservation of the listed building. Similarly, when exercising its functions, the local planning authority has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Paragraph 128 of the NPPF states that the local planning authority should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. The applicant's Environmental Statement includes a chapter which assesses the heritage impacts of the proposed development.

6.3.23 Paragraph 129 of 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. They should 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".

- 6.3.24 Paragraph 132 of the NPPF emphasises the great weight that should be given to a designated heritage asset's conservation when considering the impact of a proposal upon its significance, and this paragraph together with paragraphs 133 and 134 go on to provide a 'sequential' framework for the consideration of significance and harm impacts. However, as highlighted in a number of recent court judgements, in particular Barnwell Manor' decision (East Northamptonshire DC v Secretary of State for Communities and Local Government, Barnwell Manor Wind Energy Ltd. v East Northamptonshire DC (Court of Appeal – civic decision 18/2/2014), decisions on planning applications must be reached in the context of the 'special' regard/attention to the preservation of listed buildings and the preservation or enhancement of conservation areas. London Plan Policy 7.8 *Heritage Assets and Archaeology* states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate, and that development affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Core Policies 30 and 31 of the Core Strategy and Policy DMD44 of the Development Management Document echo these principles.
- 6.3.25 The proposed site is located immediately to the north-west of Ponders End Flour Mills. Meridian Way and Ponders End Railway Station lie between the Conservation Area and the site.
- 6.3.26 Ponders End Flour Mill comprises a rare survival of an 18th and 19th century mill, with earlier origins. There has been continuity of use on the site since the 16th century and possibly earlier. Ownership by the same family for 140 years has reinforced continuity and enabled the mill owner's house and walled garden to continue alongside the industrial complex in their original use. Listed buildings on the site include the Old Mill (grade II listed), Mill owner's house (grade II listed), house to east of mill building, used as offices (grade II) barn to south of mill owner's house (grade II). The walls of the basin and sluice for the old mill, Lodge Cottage at entrance to flour mills and the garden walls to south west of flour mills are all locally listed. The survival of the water-meadows and fields ensures a fine, picturesque setting for the listed buildings and an opportunity for a diverse wildlife habitat within a secure area. The site has clearly defined boundaries, and, although it is private land, it is easily visible from many viewpoints, including major transport routes; the railway footbridge is an extremely good viewing platform for the listed buildings and walled garden. The Mill House and walled garden are integral with the mill buildings, but provide a contrast in use and design which greatly adds to the architectural, historic and visual interest of the Conservation Area.
- 6.3.27 The Council's Conservation Officer has raised no objections to the above application and fully supports the scheme in principle, commenting that the proposed demolition of the four existing tower blocks and their replacement with improved residential accommodation will enhance the setting of both the listed mill buildings and Ponders End Conservation Area.

Residential Standards

Internal space standards

6.3.28 London Plan Policy 3.5 Quality of Design and Housing Developments sets out several criteria for achieving good quality residential development. The policy aims to ensure that developments enhance the quality of local places and create homes that reflect the minimum space standards and are fit for purposes in other respects. The policy also provides a commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor's Housing SPG (2012). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below

6.3.29 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 following figures are relevant for consideration of the proposed development:

Unit type	Occupancy level	Floor area (m ²)
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

6.3.30 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.

Distancing standards

6.3.31 Based on the proposed masterplan, it is evident that the development proposed would not in all circumstances comply with the Policy DMD10 of the Development Management Document which sets out that new development should maintain the specific distances between buildings, unless it can be demonstrated that the proposed development would not result in housing with inadequate daylight/sunlight or privacy for the proposed or surrounding development. The distancing standards set out in Policy DMD10 of the Development Management Document are:

Number of storeys in facing buildings	1-1	1-2	1-3	2-2	2-3	3-3
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Minimum distance between rear facing windows (m)	22	22	25	22	25	30
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6.3.32 An assessment of the impact of the proposed development upon the neighbouring properties is set out in the following section of this report, but in response to concerns raised at both pre-application and application stage with regards to the distance of the new buildings to one another, where it is clear that the buildings would fall below the standards of the policy, the applicant has responded, stating that:

“One of the challenges in creating a new masterplan for Alma has been how we redistribute the large number of existing homes contained in the four towers. Our solution has been to introduce a traditional network of perimeter blocks, which have a more efficient plan and consequently allow much lower building heights. This has generated a massing which blends proposed buildings into the surrounding area whilst optimising the opportunity for density in key locations, such as next to the railway station.

As part of this strategy we have generally proposed a 20m separation distance between houses and maisonettes in ‘local streets’ which have a smaller scale and less homes; and a more generous 22m separation distance where buildings are larger in scale and more intense in use.

Notwithstanding this, a 20m separation stance was critical in creating four perimeter blocks between Scotland Green Road and Alma Road. The consequence of increasing this distance would be the loss of one side of a perimeter block. This would have a severe negative impact on the masterplan design resulting in a loss of homes and creating exposed backs. The loss of homes would seriously impact on the economic viability of the scheme and the delivery of housing in the borough. The loss of one side of the perimeter block would also have negative implication on the quality of the area in terms of urban design. Any reduction to the width of the open spaces/ streets would seriously compromise their functionality and quality.

We believe a 20m separation distance provides an adequate level of privacy and reflects the more urban density of the terraced house typology. This is illustrated in the existing terraced houses at the top of Scotland Green Road (where the separation distance is only 19m) and also in new schemes in other parts of London (where overlooking distances are often 20m or less) for example Packington Estate (18-19m).”

6.3.33 The applicant’s arguments in relation to this matter are considered to be robust. Whilst the standards of the DMD policy are considered to be of high importance, a distinction can be drawn here between a new build development of this scale where the urban context in which it is set promotes higher density blocks that are closer together. As reserved matters applications are submitted in the future, should this application be granted, the onus will be on the applicant to demonstrate that the living standards of the new flats are high in terms of their access to daylight and sunlight. As this is an outline planning application and a full BRE Daylight / Sunlight Assessment cannot be undertaken as the precise layouts and floorplans of the development are not fixed. Notwithstanding this, however, the applicant’s Environmental Statement sets out how daylight and sunlight amenity has been considered throughout the design process and how the proposed

parameter plan layout (including massing and height) has been designed to maximise the amount of daylight and sunlight received. The applicant has been able to undertake the full BRE Daylight and Sunlight assessment for the first phase of the development as proposed by the full planning application – the full analysis of this is set out in the accompanying committee report, but the conclusion is that the results for phase 1A represent a high level of compliance, and in terms of sunlight amenity a good level of compliance, especially considering the urban environment. Accordingly, based on the results of the Phase 1A and schemes of similar scale, and considering the buildings are likely to be of similar layout to Phase 1A, the applicant's Environmental Statement confirms that 'daylight and sunlight amenity across the outline phases of the proposed development is likely to be comparable with the results for Phase 1A.' On this basis it is considered that even based on the separation distances and parameter plan layout/massing proposed in the outline application, that the final development would receive a good or high level of compliance in terms of sunlight and daylight amenity.

- 6.3.34 Notwithstanding the issues identified, which, on the whole, are judged to be relatively modest, it is considered that the proposed development would make a significant positive contribution to the immediate and wider area in terms of its character and would establish a high benchmark for the evolution of the development as proposed by the outline planning application.

Private Amenity Space

- 6.3.35 Policy DMD9 of the Development Management Document sets out new development must provide good quality private amenity space that is not significantly overlooked by surrounding development and meets or exceeds the specific minimum standards. The policy sets out different requirements dependant on whether the proposal benefits from access to communal amenity space. Where a residential unit would benefit from communal amenity space, the policy requires a minimum private amenity space which is proportionate to the size of the dwelling and is reflective of the standards set out in the Mayor's Housing SPG. In terms of how the development will meet the standards of Policy DMD9, the applicant's Planning Supporting Statement sets out that:

"Amenity space requirements will be met through the provision of private gardens, balconies and access to communal semi-private amenity space. The proposed perimeter block layout will ensure clear articulation of public, semi-private and private spaces, and offering the opportunity for overlooking and natural surveillance, activity, and enclosure around surrounding streets and spaces."

- 6.3.36 The applicant's Parameters Plan has been updated during the course of the application to indicate the locations of the Communal and Private Gardens, which sets out the locations for these types of spaces but not the actual amount. As this is an outline application, any future reserved matters will need to demonstrate compliance with the DMD standards.

Inclusive Access

- 6.3.37 Policy 3.8 of the London Plan currently requires all new housing to be built to Lifetime Homes' standards, and expects at least 10% of units to be wheelchair accessible or easily adaptable. However, the Mayor has recently

published draft Minor Alterations to the London Plan so as to bring it in line with the new national housing standards. The amended approach at city-wide level in the London Plan will be a requirement that 90% of units meet Building Regulation requirement M4(2) accessible and adaptable dwellings' and the remaining 10% of units meet Building Regulation requirement M4(3) wheelchair user dwellings'. Given the publication of the new national housing standards and the impending change to the London Plan, the GLA's advice to the Council as part of their Stage 1 response is that any planning condition controlling this matter should be worded appropriately. This advice has been taken into account and the planning condition has been amended so as to reflect this.

Children's Playspace

6.3.38 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 299 for the development. On this basis, the SPG indicates that the development would need to make provision for 2,990 m² of children's play and informal recreation space.

6.3.39 The applicant's Design and Access Statement highlights that within the existing Alma Estate there is a relatively large amount of public space but it 'lacks function and is of low quality'. The applicant's Design and Access Statement sets out the proposed open space and play strategy for the scheme, and demonstrates that the masterplan would accommodate 3,876 m² of children's play space. This would include the following:

- The existing MUGA will be retained in the south western corner of the site, and another play facility for older children will be provided in the civic space along South Street;
- Two Local Equipped Play Spaces will be included in the scheme, offering play facilities for under 11 year olds within a 5 minute walk of all of the proposed residential development. These facilities will offer a variety of play experiences and equipment. Equipment will be integrated into the landscape to enable children to climb, swing and slide amongst the features. The space will enable children under 11 to play and be physically active. No formal supervision will take place in the area;
- The larger equipped areas will be supplemented with doorstep informal play areas and natural play spaces. Informal play items including a grass mound, timber balancing beams and stepping stone timbers will provide a variety of play opportunities. Situating these close to the apartment improves safety and visibility. Seating elements will be included surrounding these spaces in order for carers to supervise their children.

6.3.40 It is noted that the GLA have commented that the proposed features of the play space strategy would be well integrated as part of the landscaping strategy for the development as such the application is considered to be in accordance with London Plan Policy 3.6.

6.3.41 The Council's Urban Design Officer has commented that the scheme provides the right balance between high quality public and private amenity space

provision and creates a group of buildings that are attractive and that will aid legibility in the wider area.

6.3.42 Given that the application is outline with all matters reserved, suitable planning obligations and conditions will need to be in place to ensure the delivery of the play space strategy in line with the requires of the development as it is constructed.

Landscaping and public realm strategy, including Arboricultural Assessment

6.3.43 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. The applicant's Design and Access Statement sets out that the following principles have been applied to the soft landscape design:

- The selection of plants will consider the form and eventual scale of the species in relation to the spacing and elevation of the buildings. The future maintenance requirements vegetation and their impact on buildings, pedestrian access routes and access points will also be taken into account.
- The selection of shrub planting will enhance the design of the buildings. The use of planting which will respond to the articulation of the spaces by framing and terminating views, celebrating entrances and thresholds and defining pedestrian routes and connections.
- The selection of plant species will be appropriate to their location in terms of soil type, microclimate, their setting and future maintenance/management requirements.
- The use of plant species that will increase biodiversity potential of the site through the use of locally indigenous species and planted to diversify the age range of species for enjoyment for this generation and the next.
- Appropriate 'dog proofing' will be carried out to prevent tree damage by dogs. Hessian wrapping can be applied to prevent damage to the tree stems / trunks.

6.3.44 The applicant has also set out that species have been carefully selected according to the character of the landscape spaces; for example, where larger species such as London Plane or Honey locust (Platanus, Gleditsia, Metasequoia) have been selected as robust street trees to support create new avenues along Alma Road and South Street. In communal areas, the applicant proposes a mix of native species appropriate to the areas, and also to enhance biodiversity. Seasonal interest will be created with a mix of flowering and decorative species. Along the railway line, field maple (Acer campestre) has been chosen to support biodiversity but also buffer the railway line without too much vigorous growth. The applicant states that trees will be planted according to key visual sight lines and in certain places as distinct landmarks - such as the use of Paulowina (such as a floxglove or princess tree) to create a unique accent in the treescape.

6.3.45 While it is noted that the landscaping strategy is indicative, it is considered that the parameters set would create a defined sense of place and character areas will benefit from functional design and considered street furniture. The application is also 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.

6.3.46 The Council's Urban Design Officer has advised that the Landscape Strategy and Illustrative Masterplan provide a good framework for landscaping that reinforces legibility in the area (helping to define the major routes and spaces). Overall the landscaping looks well designed and interesting, providing an appropriate setting for buildings and functional open spaces with a clearly defined purpose. The civic spaces accommodate a range of functions and generous landscaping, while retaining their primary purpose as a meeting and movement space. The provision of shared spaces and raised tables in quieter residential streets is supported. More generous front gardens along South Street are supported, as is the additional green buffer between them and the public realm, where this is part of a useable green space. A similar arrangement is proposed along Scotland Green Road. The Council will need to be satisfied that such landscaping areas will be properly maintained, and this will be controlled for a combination planning conditions and the Section 106 Agreement.

6.3.47 The applicant has submitted a compressive Arboricultural Impact Assessment (AIA) with the application, which has been reviewed by the Council's Tree Officer. The conclusions of the AIA are:

- Implications on Construction: there are no new foundations proposed within the Root Protection Areas (RPAs) of the retained trees. Changes in hard and soft landscaping will require specialist techniques to ensure the retained trees are not damaged. Protective fencing must be installed prior to the commencement of construction or contractor occupancy and be realigned as the development progresses.
- Arboricultural Implications for retained trees: A number of the retained trees may require pruning including crown lifting and cleaning. The exact specification is not known at this time, but we do not consider the works likely to be detrimental to the long-term potential of the trees.
- Landscape Implications: It is necessary to fell 225 trees in order to achieve this proposal. In general, the trees to be removed are classified as low value and the scheme has sought to retain trees where possible. The successful implementation of the proposed development presents an opportunity for landscape improvement. A substantial and detailed planting scheme is proposed including the provision of some 350 new trees. Whilst there are a large number of trees to be removed to allow the development to proceed, this has to be considered with regard to the need for regeneration of the area and the extensive landscaping proposal. A number of the more valuable trees have been retained and integrated into the development.

6.3.48 The Council's Tree Officer has no objection to the planning application, commenting at an earlier stage that the proposed landscaping would represent a significant improvement upon the existing situation and will be of benefit to both existing new residents of the area. No concerns have been raised in relation to loss of the trees with many more trees replacing those proposed to be removed.

6.3.49 Measures to secure details of landscaping are recommended to be secured by conditions and it is considered is consistent with Core Policies 4, 28, 30,

34 and 36 of the Core Strategy, Policy DMD81 of the Development Management Document and Policies 3.6, 5.10 and 7.19 of the London Plan.

S17 Crime & Disorder Act

6.3.50 Policy 7.3 of the London Plan seeks to ensure that developments should address security issues and provide safe and secure environments.

6.3.51 The proposed development would lead to the regeneration of this area with new development that would ensure increased surveillance and natural pedestrian footfall of the local area. These effects are known to have a positive impact upon crime reduction by virtue of the natural deterrent that is created. Of course, the proposed residential units could be a target for crime themselves and therefore it is important to ensure that the development would be built to a high standard including Secure by Design measures.

6.3.52 The Council has consulted the Metropolitan Police's Designing Out Crime Office as part of the application, and they have provided the following response:

"During the last 6 months we have attended several meetings with the architects contracted to work on behalf, and with the developers, on this proposal. During these meetings we gave advice on how Secured by Design' (SBD) and local crime prevention recommendations, could be successfully incorporated into the new proposed development, as part of the regeneration of Alma Estate.

I can confirm that at the design stage, consideration was given to the security of the areas and builds being retained, within the Alma Estate, as well as the proposed new areas and builds, within the regeneration. Our overall initial safety and security advice, based on the principle of SBD, also covered those who already reside, future residents, those working, schooling or just passing through the proposed regeneration and retained areas of Alma Estate.

At the end of this initial design process, we have no objection to the general design, within the proposed new build layouts or the public areas within the regeneration. The layout and build design in our opinion does not appear to unduly increase the risk of criminal and ASB to the retained neighbouring properties or the proposed new developments. The proposed development promotes good sight lines and passive natural surveillance, with many overlooking windows to public areas. Legitimate footfall is encouraged through clearly defined public routes with accommodating footways and appropriately located open and visible, shared community public space areas. Private ownership of other areas has been clearly defined by appropriate boundary treatment and access control, promoting permeability where possible. All of these, in our opinion, are essential ingredients to support a sustainable, safe, welcoming, empowered diverse community.

The developer has willingly amended several areas during the pre planning stage, to ensure they comply with our advice and SBD principles. They have indicated that they wish continue working with our support and further security advice towards achieving a full SBD accreditation for the whole development.

Our office actively promotes measurable security standards, which go further, than just the initial design and layout. We wish to further protect the new

buildings, including the surrounding foot print, boundary fencing, parking areas and shared communal spaces designed within the regeneration. We would like to respectfully request that physical security requirements are covered as a part of the planning package conditions.

If a basic minimum security legacy of achieving SBD is implemented, it will protect and deterred against opportunist criminal behaviour, ensuring the security and safety of this regeneration project can be sustained, for this, and future generations of the Estate.

6.3.53 This evidently is a very positive endorsement from the Metropolitan Police's Designing Out Crime Office and is reflective of the pre-application engagement undertaken by the applicant. The Metropolitan Police's Designing Out Crime Office refers to securing Secure by Design (SBD) accreditation for the development which officers would endorse, but this is not something that can be controlled by way of a planning condition specifically. However, as per the response above, there are a number of measures that will be subject planning conditions such as boundary treatment and other physical security measures. These conditions are recommended accordingly.

6.4 Impact of Neighbouring Properties

6.4.1 Policies 7.6 of the London Plan and Core Policy 30 of the Core Strategy seek to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. 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.

6.4.2 A development of this size will clearly have a significant impact on the surrounding properties. Whilst the development is outline with all matters reserved, the applicant has, nonetheless, and reflecting the extensive design work that they have undertaken over the last 18 months, prepared an illustrative Masterplan and supporting documents which set out the details of the scheme.

6.4.3 The proposed development must also be considered in the context of the existing buildings, in particular the significant height of the four towers and the impact they have on nearby properties.

6.4.4 The applicant has submitted drawing no. 560_OUT_PL(00)103 which shows the maximum heights of buildings across the site. As the application is in outline, this does not necessarily denote the height of the final completed buildings, but it does of course mean that the buildings will not be any higher than that listed.

6.4.5 The applicant's Environmental Statement sets out a comprehensive assessment of the impact of the proposed development with regards to a full BRE Daylight and Sunlight Assessment (with the proposed development being described as the Completed Scenario, as opposed to the Interim

Scenario which covers just the development proposed by the accompanying full planning application). In order to enable an assessment of the impact of the proposed development, based on its maximum parameters, the applicant has undertaken an extensive analysis of the effect it would have on levels of daylight and sunlight in the adjacent residential and education buildings. Only residential and educational buildings with windows that face towards the site were assessed as these are the properties considered to have a requirement for natural light that could be affected by the proposed development. In line with the BRE Report all of the windows serving habitable rooms were assessed, rooms such as bathrooms and circulation areas have been omitted.

- 6.4.6 The assessment is based on a 3D survey of the existing site and surrounds and proposed scheme drawings. The study undertaken uses a three-dimensional computer model of the proposed development and the surrounding buildings, both in the current configuration and in the proposed configuration. The effect of the proposed development on the daylight and sunlight amenity received by the neighbouring buildings and on the proposed development was then analysed using bespoke software. The assessment is based on a visual inspection, the information detailed above and estimates of relevant distances, dimensions and levels which are as accurate as circumstances allow. The applicant confirms that the assessment was carried out in accordance with the guidance given in the BRE Report and the Code for Sustainable Homes as detailed below.
- 6.4.7 In terms of daylight amenity a window transgresses the BRE Report guidelines when the proposed Vertical Sky Component (VSC) figure is less than 27% and the proposed VSC is less than 0.80 times the VSC value in the existing conditions. Using the Daylight Distribution assessment a room transgresses the BRE guidelines when it experiences a reduction in skylight to 0.80 times the existing area. In terms of sunlight amenity a window transgresses the BRE Report guidelines when the proposed Annual Probable Sunlight Hours (APSH) figure is less than 25% or less than 5% during the winter months and the proposed APSH figure or winter sunlight figure is less than 0.80 times the value in the existing conditions.
- 6.4.8 The applicant's assessment is set out in their Environmental Statement. The first part of the assessment looks at the existing situation to establish a baseline for the area. The results of the assessment are:
- The baseline conditions generally show a good level of compliance with the BRE Report guideline values. The majority of neighbouring properties show in excess of 60% compliance with the guidelines for daylight amenity using the VSC test and in excess of 70% compliance with the guidelines for sunlight amenity. This level of compliance is typical in an urban environment.
 - The three surrounding properties achieving less than 60% compliance with VSC are 10-16 Alma Road, 167-171 South Street and 56 Falcon Road. 10-16 Alma Road is located opposite an existing four storey block of flats and 167-171 South Street is located opposite the twenty-two storey Cormorant House which obstructs the access to daylight. Many of the windows in 56 Falcon Road are obstructed by protruding roof eaves and walls which obstruct the access to daylight.
 - 47-61 Alma Road and Cormorant House both achieve less than 60% compliance with the BRE Report guidelines for daylight amenity. These

properties form part of the proposed development but have been tested for use in the Interim Assessment only and will no longer exist in the full completion scenario. 47-61 Alma Road faces an existing four storey building which obstructs daylight in the existing conditions. A number of the windows on this property have projecting balconies above them which severely limits the amount of sky these windows can see. Cormorant House sees transgressions of the BRE Report guidance values for both daylight and sunlight amenity all the way up to twenty-second floor, this shows that the projecting balconies above severely limits the amount of sky these windows can see.

- In the baseline conditions of the 101 amenity areas tested, 93 (92%) fully comply with the BRE Report guidelines achieving at least 2 hours of direct sunlight over at least 50% of their areas on March 21st. This represents a high level of compliance in an urban environment.

6.4.9 The applicant's assessment then sets out the impacts of the proposed development. The applicant's detailed analysis of the impact on each building is set out in paragraphs 15.5.6 to 15.5.80 of the Environmental Statement, and is summarised in the following table

Issue	Potential Effect / Significance	Mitigation measures	Residual Effect / Significance
Reduction in daylight levels to:			
223-259 Scotland Green Road North	Minor Adverse	No mitigation required	Minor Adverse
158-198 Scotland Green Road North	Minor Adverse	No mitigation required	Minor Adverse
10-16 Alma Road	Minor Adverse	No mitigation required	Minor Adverse
1-7 Anglers Terrace	Minor Adverse	No mitigation required	Minor Adverse
167-171 South Street	Minor Beneficial	No mitigation required	Minor Beneficial
Oasis Academy Hadley, South Street	Minor Adverse	No mitigation required	Minor Adverse
24 Scotland Green Road	Minor Adverse	No mitigation required	Minor Adverse
65-99 Curzon Avenue	Minor Beneficial	No mitigation required	Minor Beneficial
Reduction in sunlight levels to:			
10-16 Alma Road	Minor Adverse	No mitigation required	Minor Adverse
1-7 Anglers Terrace	Minor Adverse	No mitigation required	Minor Adverse
Oasis Academy Hadley, South Street	Minor Adverse	No mitigation required	Minor Adverse
24 Scotland Green Road	Minor Adverse	No mitigation required	Minor Adverse
26 Scotland Green Road	Minor Adverse	No mitigation required	Minor Adverse
28 Scotland Green Road	Minor Adverse	No mitigation required	Minor Adverse
47 Scotland Green Road	Minor Adverse	No mitigation required	Minor

		required	Adverse
65-99 Curzon Avenue	Minor Beneficial	No mitigation required	Minor Beneficial
Permanent Overshadowing to Neighbouring Areas	Minor Beneficial	No further mitigation required	Minor Beneficial
Transient Overshadowing to Neighbouring Areas	Minor Beneficial	No further mitigation required	Minor Beneficial

- 6.4.10 The table above indicates that there would be some adverse impact on a number of adjacent properties, which the applicant has judged to be 'minor adverse'. The applicant's definition as set out in the Environmental Statement of a minor adverse impact is "A reduction from the existing scenario which may be marginally noticeable to the occupant. This may include a number of marginal infringements or the numerical levels suggested in the BRE Report guidelines which should be viewed in context. This also includes a number of rooms which comply with at least one but not all of the assessment methodologies." The next step up is 'moderate adverse', and it is noted that this level of impact is not judged to occur based on the BRE Guidelines.
- 6.4.11 The applicant's summary of the analysis in relation to the impacts of the development on surrounding properties is as follows:

"It is important to note that the introduction to the BRE Report stresses that the document is provided for guidance purposes only and it is not intended to be interpreted as a strict set of rules. The examples given in the BRE Report can be applied to any part of the country: suburban, urban and rural areas. The inflexible application of the target values given in the BRE Report Guidelines may make achieving the guidance difficult in a constrained, urban environment where there is unlikely to be the same expectation of daylight and sunlight amenity as in a suburban or rural environment. This is illustrated by the baseline results, which show that a large number of windows considered in the assessment achieve less than 27% vertical sky component (VSC) and 25% Annual Probable Sunlight Hours (APSH) in the existing conditions.

The analysis shows that the neighbouring properties and proposed schemes would receive daylight and sunlight amenity consistent with expectations of an urban area. Whilst there are a limited number of transgressions of the BRE Report guidelines for daylight and sunlight amenity, there are also a number of windows which would benefit from the proposed development."

- 6.4.12 Broadly speaking, this analysis is agreed with. The impact of the proposed development would be mixed, with some adjacent properties likely to experience some impact whilst others experience some improvements. Given the urban context in which the site is located, and in particular noting the height of the four towers on the site presently, this is to be expected. That the development would result in some limited impacts on the adjacent residential properties is noted, and, although judged to be relatively minor, is of course not ideal. However, given the constrained urban setting in which the development proposed is located, it is considered that the overall benefits of the proposal insofar as the regeneration of the area and the delivery of increased housing, replacement affordable housing of a higher standard than

exists presently, and the associated infrastructure delivery, on balance the minor impact on the amenities of the occupiers of these properties is judged to be acceptable in this instance.

6.5 Traffic and Transportation

6.5.1 The NPPF sets out the overarching planning policies on the delivery of sustainable development through the planning system. It emphasises the importance of reducing the need to travel, and encouraging public transport provision to secure new sustainable patterns of transport use.

6.5.2 Paragraph 29 of the NPPF states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The NPPF maintains a town centre first approach and encourages the development of sites close to good public transport at higher densities. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.

6.5.3 Paragraph 33 of the NPPF states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF is clear that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

6.5.4 The London Plan Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimise additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan sets out maximum parking standards for new development dependent upon their use and level of public transport accessibility.

Pre-application

6.5.5 Pre-application discussions were held between the applicant and the Council's Traffic and Transportation Officers up to and including 2015. These covered the overarching access and parking considerations proposed for the site.

6.5.6 The applicant has provided a Transport Assessment with associated documents, Framework Construction Management Plan and accompanying drawings. These formed the basis of the review by the Council's Traffic and Transportation Officers, with further details provided in response to clarification requests. The review raised a number of matters requiring additional clarification which were circulated to the Case Officer and applicant. These are summarised below:

- Parking;
- Car Club provision;
- Controlled Parking Zones (potential);
- Access points;
- Traffic management proposals, materials, drainage;
- Trip Generation and on-street surveys;
- Junction modelling;
- Travel plans;
- Pedestrian and Cyclist provision.

6.5.7 A number of meetings, conversations and ongoing communication took place between the Council's Traffic and Transportation Officers and the applicant and applicant's transport consultant between 2014 and 2015. These sought to clarify the above matters, resulting in additional surveys, analysis and consultation.

6.5.8 A well-attended Planning Panel took place. Following this event, the Council's Traffic and Transportation Officers met with the applicant with regard to issues arising.

6.5.9 The outcomes of these fed in to the ongoing discussions with the applicant's team, with particular emphasis on potential impacts for the existing residents in the vicinity of the Site. This in turn led to some adjustments to the parking and access proposals.

Proposed Development

6.5.10 The overall non-residential development is set out in the description of development section of this report. Existing retail uses will be re-provided in full, although the community use is changing from community office to a new community centre, medical centre and youth centre. Implementation of the development is proposed between 2018 ('Phase 1A' as proposed by the accompanying full planning application) and 2026.

Trip Generation

6.5.11 The applicant's submission considers a range of data sets relating to the site – these included historic and recent studies relating to the wider development aspirations in the vicinity in addition to modelling analyses closer to the High Street. Whilst the age of certain data sets is close to, or slightly older, than typical thresholds, the traffic patterns and volumes are not significantly changed. This is also noted in the context of the forthcoming TfL Major Scheme on the High Street which will have a more pronounced impact on that location.

6.5.12 The site presents a net uplift in provision of residential units. All other land uses are remaining as existing, or with minor reconfigurations (non-residential units). The overall uplift is 247 units. Of the total 933 units, 200 new units are for social rent, 199 intermediate homes (and noting the comments made above in relation to the 73 of these units that could form a different affordable housing tenure) and 594 private homes (including 116 houses and maisonettes). It is noted that construction is expected to take place across 4 main phases, each with sub-phases.

6.5.13 Previous Council commissioned analyses (Halcrow, 2012 / 2013) have established that a range of development proposals could be accommodated on the local traffic network.

6.5.14 In order to consider a robust assessment the applicant has carried traffic surveys and interrogation of trip generation databases, primarily TRICS.

Non-Residential Uses

6.5.15 The following table summarises the proposed trip rates and total daily trip rates as prepared by the applicant. The sites used to form the assessment appear acceptable.

Land Use	Total Daily Trip Rate (trips per 100sqm)			Total Daily Trips		
	In	Out	Total	In	Out	Total
Retail				210	210	420
Café	134.0	134.0	264	-35	-35	-70
Community Offices				-13	-13	-26
Gym				44	44	89
Community Centre	10.1	10.1	20.2	0	0	0
Youth Centre				0	0	0
Medical Centre	10.3	10.3	20.6	55	55	110
Total	-	-	-	262	262	524

6.5.16 The applicant asserts that the majority of trips associated with the non-residential uses will be by local residents. This is considered acceptable given the scale of facilities proposed (and retained). The Council's Traffic and Transportation Officers notes that there may be some linked trips associated with school uses, although these would be limited in number.

6.5.17 The medical centre and station may generate vehicular trips from further afield. However, the station is an existing facility and the planned enhancements to the network are still a number of years away.

6.5.18 The medical centre does propose 4no. dedicated parking spaces but will also serve the local community. Travel Plans are proposed to manage travel patterns.

Residential Uses

6.5.19 Sites selected have been informed by the TRAVL database and previous Council studies. The sites considered equivalent parking ratios as proposed for the Alma Estate. The following trip rates are proposed, and are considered acceptable.

Time Period	Total Trip Rate (Vehicle Trip Rate)	Total Trip Rate (Vehicle Trip Rate)	Total Daily Trip Rate (Vehicle Daily Trip Rate)
	In	Out	
Morning Peak Hour	0.12 (0.04)	0.48 (0.17)	0.59 (0.21)
Evening Peak Hour	0.25 (0.09)	0.16 (0.06)	0.41 (0.14)
Total Daily	2.62 (0.92)	2.73 (0.96)	5.35 (1.88)

NOTE: Trip rates here are rounded to the nearest two decimal points; rounding errors might induce a difference of one to two trips in calculations of total number of trips.

6.5.20 Mode share proportions have been informed by the 2011 Census data for the super outputs areas.

6.5.21 The applicant has modified the ratios in order to account for the car ownership ratio and lack of Underground facilities (table below). This is considered acceptable.

Mode	Mode Splits	
	Census 2011	Modified Mode Splits to match Proposed Car Ownership
Train	13.1%	24.1%
Bus, Minibus or Coach	23.1%	25.0%
Taxi	0.4%	0.4%
Motorcycle, Scooter or Moped	0.2%	0.3%
Driving a Car or Van	40.0%	35.1%
Passenger in a Car or Van	1.8%	2.0%
Bicycle	1.5%	1.6%
On Foot	10.0%	10.8%
Other Method of Travel to Work	0.8%	0.8%
Total	100%	100%

6.5.22 This section of the report considers the trip generation for the overall development – completion in 2026 – resulting in an increase of 247 units.

6.5.23 Total trip generation for the full development is shown below, the associated vehicular trip generation is shown immediately below.

Table 5.14 Total Trip Generation by Proposed 993 units

Time Period	Vehicle Trip In	Vehicle Trip Out	Total Daily
Morning Peak Hour	116	472	589
Evening Peak Hour	249	157	407
Total Daily	2,600	2,714	5,313

Table 5.15 Vehicular Trip Generation by Proposed 993 units

Time Period	Vehicle Trip In	Vehicle Trip Out	Total Daily
Morning Peak Hour	41	166	207
Evening Peak Hour	88	55	143
Total Daily	913	953	1,866

6.5.24 The trip generation associated with the net increase in units is shown below, following the same convention.

Table 5.16 Total Trip Generation by Net Increase of 247 units

Time Period	Vehicle Trip In	Vehicle Trip Out	Total Daily
Morning Peak Hour	29	117	146
Evening Peak Hour	62	39	101
Total Daily	647	675	1,322

Table 5.17 Vehicular Trip Generation by Net Increase of 247 units

Time Period	Vehicle Trip In	Vehicle Trip Out	Total Daily
Morning Peak Hour	10	41	51
Evening Peak Hour	22	14	36
Total Daily	227	237	464

6.5.25 Overall, the proposed development is anticipated to result in increased traffic movement of 51 vehicles in the AM peak hour, and 36 in the PM peak hour.

6.5.26 The following table summarises the trip generation by mode for the net increase of 247 units based on the mode splits above.

Mode	AM Peak Hour			PM Peak Hour			Total Daily		
	Trips In	Trips Out	Total	Trips In	Trips Out	Total	Trips In	Trips Out	Total
Train	7	29	36	15	9	24	156	163	319
Bus	7	29	36	16	10	26	162	169	331
Taxi	0	0	0	0	0	0	2	2	4
Motorcycle	0	0	0	0	0	0	1	2	3
Car driver	10	41	51	22	14	36	227	237	464
Passenger in car	1	2	3	1	1	2	13	13	26
Bicycle	1	2	3	1	1	2	11	11	22
Walk	3	13	16	7	4	11	70	73	143
Other Method	0	1	1	0	0	0	5	5	10
Total	29	117	146	62	39	101	647	675	1,322

Trip Distribution

6.5.27 Committed development information was used to establish the estimated future baseline flows, summarised below.

Time Period	Alma Road/ South Street	South Street/ Scotland Green Road	Durant's Road/ Alma Road
Morning Peak Hour	564	1,805	1,434
Evening Peak Hour	713	1,094	2,113

6.5.28 The applicant has developed the following distribution for the proposed vehicular traffic flows:

- Durant's Road/ Alma Road – 10% of the development flows are assumed to travel northbound;
- South Street/ Scotland Green Road – 90% of the development flows are assumed to access Alma Road travelling southbound;
- Alma Road/ South Street – 90% of the development flows.

6.5.29 This results in the following assignments for the increased flows resulting from the 2026 full development, with percentage change shown below:

Time Period	Alma Road/ South Street	South Street/ Scotland Green Road	Durant's Road/ Alma Road
Morning Peak Hour	46	46	5
Evening Peak Hour	32	32	4

Time Period	Alma Road/ South Street	South Street/ Scotland Green Road	Durant's Road/ Alma Road
Morning Peak Hour	8.2%	2.6%	0.4%
Evening Peak Hour	4.5%	2.9%	0.2%

Junction Assessment

6.5.30 Within the development site, the main junction to be directly affected is South Street j/w Scotland Green Road. A PICADY analysis was carried out and the outputs presented below (future baseline and future baseline plus development, respectively):

Approach	AM			PM		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
Falcon Road Left Turn	0	12	25%	0	7	4%
Falcon Road Right Turn	0	31	33%	0	12	5%
South St (E) Right Turn	0	9	4%	0	8	6%
Scotland Green Road Left Turn	0	13	21%	0	10	16%
Scotland Green Road Right Turn	15	206	105%	3	43	76%
South St (W) Right Turn	0	13	23%	0	8	2%

Table 6.10: 2026 Baseline Scenario with Alma Estate Development

Approach	AM			PM		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
Falcon Road Left Turn	0	13	26%	0	7	5%
Falcon Road Right Turn	1	35	36%	0	13	5%
South St (E) Right Turn	0	9	5%	0	8	7%
Scotland Green Road Left Turn	0	13	21%	0	10	16%
Scotland Green Road Right Turn	18	240	109%	3	45	78%
South St (W) Right Turn	0	13	24%	0	8	2%

6.5.31 The applicant notes that the junction is expected to experience capacity issues in the future – the net change between scenarios is (in relative terms) small.

6.5.32 This junction provides an opportunity for connections with the Council's cycle network, including onward connections to the park and the wider Cycle Enfield proposals. Noting the traffic situation, it is considered that the junction and its connection to the proposed 'boulevard' along the north side of South Street can be usefully enhanced to improve cycle connectivity, rather than solely rely on on-street cycle facilities.

Public Transport

6.5.33 Increased patronage of the existing bus routes and train services will result from the scheme. The uplift is noted and TfL have confirmed their support.

Parking

Residential

6.5.34 Sites selected have been informed by the TRAVL database and previous Council studies. The sites considered equivalent parking ratios as proposed for the Alma Estate. The following trip rates are proposed, and are considered acceptable.

6.5.35 The proposed parking ratio for the overall Site is at 0.6 spaces per unit (on average), predicated on the current London Plan and LB Enfield standards. The parking ratio has also been informed by 2011 Census data covering to Super Output Areas relevant to the Site (below). This has also been further informed by parking surveys across the area, including surveys undertaken prior to the partial decanting of existing residents from the estate.

Car or Van Availability	Enfield Super Output Area		
	014C	014D	Combined
All Households	688	610	1298
No Cars or Vans in Household	295	353	648
1 Car or Van in Household	295	227	522
2 Cars or Vans in Household	77	27	104
3 Cars or Vans in Household	18	2	20
4 or More Cars or Vans in Household	3	1	4
All Cars or Vans in the Area	515	291	806
Percentage of car ownership per household	75%	48%	62%

6.5.36 The parking survey rationale in support of the parking ratio is summarised in the TA:

“The total number of existing residential units was 746 during 2012. LBE had further informed that the Council had not commenced decanting until September 2012, therefore during the surveys in Jan/ Feb 2012 there were approximately 545 tenants and 170 leaseholders. This shows that with a parking capacity of 655 and 439 vehicles parked, the car ownership at 2012 was equivalent to 61%.”

6.5.37 It is acknowledged that smaller units would be provided at a lesser ratio, larger units at a greater ratio. To clarify, smaller dwellings (1-2 bed) will be served by less than 1 space per unit with the larger dwellings (3 & 4 bed) typically being served by just over 1 space per unit.

- 6.5.38 A balance is being struck between the number of units (including uplift), optimal number of parking spaces, and planned future improvements to public transport for the area (primarily rail capacity enhancements).

Car Club Provision

- 6.5.39 A total of 5no. car club spaces are proposed for the development, with a front-loaded approach being followed to optimise take up of the facilities. Both Zipcar and City Car Club have been approached with solid interest shown by both parties.
- 6.5.40 Car clubs are considered a key component of the transport strategy for this site – the locations are distributed across the site reflecting the phased nature of the development. The benefits will also be available for use by residents in the surrounding area. This is very encouraging and will provide a sound basis for supporting the development. Details of Zipcar's current, in-principle offer have been submitted as part of the application, and form the basis for on-going Section 106 planning obligations negotiations.

Existing Residents' Parking

- 6.5.41 The site is situated within an existing residential area that experiences some focused pressures arising from school related transport. The proposed development seeks to minimise private car use through design, travel planning and car club measures. The surveys carried out to date, and car ownership analysis, support the applicant's proposal.
- 6.5.42 Consideration has been given to potential future mitigation given the anticipated programme for implementation of all development phases. Feedback from TfL has also supported this approach. To this end contributions towards a future CPZ will be sought, with trigger points established to respond to potential impacts on existing residential parking. The Council will retain a watching brief on this aspect, and a contribution to future CPZ consultation would be secured by planning obligation. Where appropriate, the 'new' streets created by the proposal may be adopted and would also therefore fall within a CPZ if one is established.

Commercial Uses

- 6.5.43 The existing Falcon Road Spur car park provides pay and display facilities, and will be subject to adjustment as part of the proposals. It will continue to provide paid-for parking for the commercial uses in and around South Street.
- 6.5.44 The proposed drop-off to the station is being reduced in size although disabled parking provision is being retained. There are concerns over the level of use and risk of blocking, abuse, overflow. These are considered in the detailed application for Phase 1a of the development (app. Ref. 15/02040/FUL).

Cycle Parking

- 6.5.45 The level of cycle parking across the development is less than the current Further Alterations to the London Plan recommend – this is a product of changing policy landscape over the development of the scheme and available space in a constrained environment. The applicant has reviewed the

provision to increase overall numbers and distribution of cycle parking. There are potential implications on the resulting vehicle parking numbers owing to the amount of available space. Cycle parking should be provided in form of Sheffield stands across all phases. Condition

General Strategy

- 6.5.46 Parking spaces will comply with current guidance on dimensions, accessibility, layout etc. Swept-path analysis has not been provided for each space / area, but an overall assessment was carried out demonstrating ease of use.
- 6.5.47 Car parking management plans will be required and will be secured by condition / obligation.
- 6.5.48 TfL have identified a demand led approach to parking provision – indicating that monitoring through a management plan (with Travel Plan) , if less parking demand results across the phases, then less parking should be provided. Whilst the Council seeks a ratio of 0.6 across the development, it is noted that the ratio could be affected by the following:
- Increased cycle parking provision
 - Traffic management facilities on Alma Road
 - Increased disabled parking provision.
- 6.5.49 In order to manage these risks, consideration is given to a flexible approach regarding each of the three criteria listed above.
- 6.5.50 The applicant has since provided written statements from Newlon regarding the take up of disabled parking spaces by eligible residents. The Council's Traffic and Transportation Officers note that it is not certain that all wheelchair accessible units will be occupied by eligible candidates whether in affordable or market housing. It is also noted that an arbitrary full provision of cycle parking across the site may not be used at levels associated with the current London Plan standards.
- 6.5.51 As such, and in line with TfL's suggestion of demand led approaches to parking, the Council and applicant have considered the following options against which the impacts on parking ratio can be established.

Requested Proposal	Description	Resulting Net Loss of Car Parking Spaces	Resulting Car Parking Ratio (spaces per Unit)
Wheelchair parking	Option 1 - 1:1 wheelchair parking for all tenures for Phase 1A; 1:1 wheelchair parking for Social Rent units and 0.8:1 for Market and Intermediate units for Phase 2A to 4	1	0.6
	Option 2 - 1:1 wheelchair parking for all tenures across all phases	5	0.6
Cycle parking	To provide FALP 2015-compliant level of cycle parking (uplift of 497 cycle parking spaces across the site)	24	0.58
Alma Road Traffic Calming	Option 1 – Horizontal deflections with physical build-outs and raingardens along Alma Road to reduce speed	6	0.59
	Option 2 – Localised narrowing with hatching along Alma Road to reduce speed	0	0.6

6.5.52 At this stage, it is noted that full London Plan (FALP) cycle parking may be physically located across the site, however, it jeopardises the overall parking ratio.

6.5.53 The adoption of a Parking Management Plan to monitor take up, liaising with the Travel Plan Coordinator for the Travel Plan, offers a sound way to manage the issue. Cycle parking can therefore be provided on an incremental basis, reflecting demand and promotion through the Travel Plan, securing the options for disabled parking over 'general' parking.

6.5.54 Alma Road traffic calming has been requested by the Council's Traffic and Transportation Officers to follow similar principles to the scheme already in place past the Primary School. Horizontal deflection was introduced as part of a safety scheme – the Council's Traffic and Transportation Officers require this approach to be maintained. The alignment is also a bus route, hence vertical deflection is not supported, nor were the original proposals supported by TfL. The introduction of horizontal deflection as a traffic calming measure does lead to a reduction in of six on-street car parking spaces (as per the table above) that will be available; the Council's Traffic and Transportation Officers have not objected to this.

Public Transport

6.5.55 There are two existing bus stops within a short walking distance of the development site along South Street / Alma Road. The site is in a very close proximity to Ponders End rail station.

6.5.56 Overall the public transport proposals are considered broadly acceptable. The feedback from Transport for London is noted and reproduced below:

“The submitted plans include the relocation of bus stops however these aren't referenced within the TA and therefore the applicant's intentions need to be clarified as any relocation will need to be undertaken in consultation with TfL. Enhancements to the West Anglia Mainline and the eventual introduction of Crossrail 2 services at Ponders End Station will increase passenger demand at this location which may necessitate an increase in bus services. This would require ancillary bus standing facilities and therefore in accordance with

London Plan policy 6.2 TfL request that the applicant identifies land within the site to be safeguarded for one bus stand.”

6.5.57 The applicant's response to TfL's comments on the bus stop issue is that "The requirement to relocate the bus stop on South Street would be discussed with TfL buses."

6.5.58 The Council's Traffic and Transportation Officers broadly concur with these TfL's stipulations – however it is noted that bus stand facilities at this stage are subjective. In the event that such facilities are required, a location within the development boundary is not supported – the bus stand will be located close to residential properties and hence there will be issues of noise and impact on amenity. The Council's Traffic and Transportation Officers note that if a bus stand is required in the future, opportunity exists on Woodall Road away from residential premises. Buses will also be able to enter and exit Woodall Road in forward gear without having to manoeuvre.

Road Safety

6.5.59 A total of 20 local incidents were recorded with no fatalities and three recorded as serious. The rest recorded slight casualties.

6.5.60 It is noted however that the incidents involved the following users: one cyclist; six pedestrians with the remainder vehicle based.

6.5.61 The pedestrian incidents involved vulnerable groups suggesting a recurrent theme: one pedestrian (64 years) and five children under 12 years old.

6.5.62 The applicant notes: *"Two of the six incidents were of a serious severity. Of these six pedestrian incidents, four occurred at a give way/priority junction with no pedestrian crossing facilities within 50m of the location and the pedestrian did not look properly before crossing or ran out into the road. One of the serious incidents took place on a pedestrian crossing and the remaining pedestrian accident occurred whilst the pedestrian crossed the road from in front of a bus. The accident that involved a cyclist occurred at a priority junction where a vehicle pulled out into a passing cyclist."*

6.5.63 Whilst driver / individual error accounts for some causal factors, it is clear that the proximity of the Academy and uplift in traffic suggests that vulnerable users will benefit from some separation – at least opportunities for separation. This further supports enhancements to the Scotland Green Road / South Street junction to accommodate cyclists traveling along the 'boulevard' to the north of South Street.

6.5.64 All the incidents that occurred were due to driver and road user error such as failing to look properly and careless/reckless driving. Overall, these accidents were not caused by recurring problems in the area's highway layout or design.

Walking & Cycling

6.5.65 The applicant has undertaken a PERS audit as part of the submission.

6.5.66 The audit rated the pedestrian footbridge over the rail lines as 'green'. Comments received from Lea Valley Regional Park Authority and TfL suggest

some improvements would be welcome. It is noted here that the 'bridge' comprises two structures. The first (to the eastern end) is owned by the Council, the second (western, connecting to the station) is owned by Network Rail. The Council does not have works scheduled for its bridge as it is in good condition.

- 6.5.67 As such, minor modifications to improve pedestrian and cyclist access from Meridian Way to the bridge are considered feasible. This has been discussed and agreed with the applicant; contributions will be secured via obligation.

Travel Plans

- 6.5.68 Surveys to take place in neutral months, survey periods may need to include traffic counts at accesses etc. to demonstrate actual on-the-ground changes not just questionnaire based summaries.

- 6.5.69 Monitoring – ongoing reviews should also raise the possibility of increased monitoring frequency and/or more detailed monitoring if targets are not being met.

Delivery & Service Plans

- 6.5.70 Draft Delivery & Service Plan has been provided with the application. The overall approach is positive. This will be secured by condition and/or through the Section 106 Agreement.

Construction Traffic Management

- 6.5.71 Construction traffic management will be necessary given the proposed phasing plans. An area CTMP has also been commissioned and provides an overarching summary of issues affecting the area.

- 6.5.72 A 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 condition and/or Section 106 Agreement.

6.6 Sustainable Design and Construction

Energy, and the Lee Valley Heat Network

- 6.6.1 The Development Plan policies embed 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.

- 6.6.2 The delivery of the Lee Valley Heat Network (LVHN) and associated heat networks that provide low cost heat and energy to the Opportunity Area and to its surrounding areas is a key priority of the ULV OAPF (Objective 6 and

Chapter 5). This is reflected in the above policies, and in particular in Chapter 9 of the NEEAAP which places a firm emphasis on enabling the establishment of the LVHN and identifies the regeneration of the Alma Estate as a key component of this, specifying that a Combined Heat and Power (CHP) plant – aka an Energy Centre – is provided on the site as part of its development.

6.6.3 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. The applicant has set out in their application documents that:

“The long-term vision for the development is to provide an energy centre that will connect to all phases of development, and become an integral part of the Lea Valley Heat Network (LVHN), (a district heating network owned by the Council). However, as this system does not currently exist, the immediate objective of the redevelopment will be to provide an energy strategy that complies with the London Plan energy policies and hierarchy through the provision of a site-specific energy centre and heat network for the Alma Estate.”

6.6.4 The applicant goes onto to highlight that:

- The Energy Strategy for the Alma Estate has been specifically designed to enable connection to the wider LVHN at a later date and will not impede future proposals brought forward by the LVHN.
- To minimise capital investment in the first phase of development, helping to improve the viability of this phase and boost the necessary quantum of affordable housing that can be delivered in Phase 1A, to meet the decant requirements the energy strategy proposes a temporary energy centre with its own heat substation to be built in Phase 1A. Subsequently a new, site-wide energy centre will be built in Phase 2A. Once commissioned the boilers in the Phase 1A temporary energy centre will be decommissioned.
- The primary heat network will supply two heat substations that will serve the entire development. Design principles have been established in the Design and Access statement and design code to ensure the site wide energy centre does not create a ‘dead frontage’ along Woodall Road.

6.6.5 The applicant’s Energy Strategy sets out the proposal’s compliance with London Plan Policy 5.2 in terms of carbon dioxide emissions reductions through energy efficiency measures (Including passive design measures, heat loss measures and low energy lighting), renewable energy technologies which would comprise 226kWp of photovoltaic panels and a site-wide energy network, which would be in the two distinct elements as referred to above. The Council’s Sustainable Design Officer notes that the fabric first approach, a site wide heat network and 1,477m² of photovoltaics spread across the whole of the site is consistent with the energy hierarchy advocated by the relevant policies. The Energy Strategy sets out that these measures would achieve carbon dioxide savings of 36% which is supported by the Council’s Sustainable Design Officer and the GLA.

6.6.6 In relation to the initial Energy Strategy with regards to the heat network provision submitted by the applicant, the Council’s Sustainable Design Officer

endorses the phased approach to deliver the energy centre, which seems sensible, and the strategy to install an initial 0.5MW CHP for phases 1-2 and a further 0.5MW to accommodate phases 2-4 would accommodate heat demand for the regeneration site.

6.6.7 However, he raises some concern in relation to the future expansion opportunities, including how the connection to the larger LVHN will be accommodated. The Energy Strategy eludes to 'Provision for other users outside development area and space for alternative heat source connection' but stops short of actually operationalising what this means both in terms of space (the critical issue) and any associated infrastructure of plant. This concern was also shared by the GLA, who commented as part of their Stage 1 response that they sought '*further information with respect to potential timescales for connection*'.

6.6.8 In response to these concerns, the applicant has submitted a Technical Note on Energy Strategy Clarifications. Amongst other things, this Technical Note sets out the applicant's commitment to the delivery of the LVHN, stating:

*"Countryside and Enfield Council have engaged with representatives of the Lee Valley Heat Network (LVHN) regarding the future provision of heat from the planned waste to heat network and in accordance with Enfield Council Planning Policy DMD 52 (Decentralised Energy Networks). As part of this process and on-going design consideration, representatives from LVHN have identified that Alma Estate could be utilised as an interim Energy Centre (EC) which would provide suitable intermediate connection points from the planned main LVHN in Edmonton. It should be noted that at the time of writing no further details have been made available for the timescales of delivery associated with the waste to heat plant or other associated infrastructure. **Countryside are fully committed to connection to the LVHN...**"*
(Emphasis added)

6.6.9 The Technical Note goes on to highlight the following, which are all set in the context of the applicant's commitment to deliver the infrastructure needed for the LVHN:

- A clear demonstration of the commitment to LVHN is that the main Energy Centre has been designed in order to serve more than the ALMA Estate.
- As part of the negotiation with LVHN, a total additional provision of 0.5MWe CHP and 2MW Boiler capacity has been allowed for, over and above the total requirements for the Alma Estate.

6.6.10 The applicant estimates that this gives a total spare capacity for circa 500 residential dwellings and the Heron Hall Academy, a 1,680 student school (including allowances for distribution losses at 15%) or circa 800 residential dwellings without the Academy. The Technical Note includes the current plan for the primary and secondary network and the latest plan for the main Energy Centre, which are based on negotiations and input from the LVHN.

6.6.11 The Council's Sustainable Design Officer has reviewed the additional information submitted by the applicant and is satisfied that this addresses the concerns raised. As discussed in further detail in section 6.8, obligations are recommended to control this.

Sustainability

6.6.12 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. Policy 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, policy DMD50 expands this requirement and dictates that non-residential development a BREEAM New Construction rating of 'Excellent' from 2016. In this regard, all developments are 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.

6.6.13 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 'Very Good'. In response to a request from the Council's Sustainable Design Officer for further information on whether a higher BREEAM standard could be achieved, the applicant has submitted a Sustainability & Energy Strategy Clarifications Technical Note which states:

"The submitted Sustainability report identifies current policy in respect of environmental standards including BREEAM. This confirms the development will meet current policy requirements, incorporating the achievement of BREEAM 'Very Good' to all non-domestic areas. In light of comments received, we note that the non-residential area of the scheme represents less than 2% of the total floor proposed development area. As a result of this, the necessary measures to achieve a rating of BREEAM 'Excellent' should be considered in overall context and suitability. In order to achieve a rating of Excellent, an increase in the overall score of 15% is required (70%) representing a total improvement of 27% improvement in overall performance. It should be noted that any required improvement over and above current targeted levels requires consideration to be made early during the design process and also through specification during tenant fit out stages. As such and in the absence of known tenants, the use of a Very Good is deemed more appropriate, inclusive of setting benchmarks over and above industry standards at the time of writing."

6.6.14 The Council's Sustainable Design Officer has confirmed that based on this information the applicant's approach is acceptable in relation to this matter.

Green Roofs / Living Walls

6.6.15 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.

- 6.6.16 The applicant proposes 1,156m² of biodiverse green roofs as part of the first phase of the development, with the rest of the development to be calculated on a phase-by-phase basis taking into account the individual constraints of the buildings in that phase. The Council's Sustainable Design Officer is concerned that the amount proposed for phase 1A is limited and therefore the policy's requirement for maximising provision is not adhered to. The applicant's Sustainability & Energy Strategy Clarifications Technical Note responds to this and raises concerns over ongoing maintenance costs of living walls, the need for suitable glazing to enliven particular frontages – for example, the site-wide Energy Centre to be provided in Phase 2A – and the biodiversity strategy which prioritise green spaces and roofs over walls.
- 6.6.17 Natural England (NE), as part of their consultation response to the application, highlight that they are supportive of the inclusion of green roofs in all appropriate development as research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding, reducing the requirement for heating and air-conditioning and providing habitat for wildlife. Accordingly, they advise the Council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide.
- 6.6.18 The Council's Sustainable Design Officer is not satisfied that the applicant's position on this matter has been properly evidenced and is clear that the utilisation of living walls across a major development site such as this cannot be discarded. Accordingly, in order to address this issue, a suitable worded planning condition is recommended that would allow this matter to be robustly examined at reserved matters stage rather than prematurely omitting the measure. **CONDITION**

Water

- 6.6.19 Core Policy 21 and Policy DMD58 of the Development Management Document set out that all new development will be required to maximise its water efficiency, subject to technical and economic feasibility and other relevant planning considerations. Policy DMD58 sets out specific targets for residential and non-residential water use for new developments and also encourages rainwater collection and greywater recycling features.
- 6.6.20 The application seeks to target 105 litres / person / day for the residential units and 12.5% improvement over a BREEAM baseline for non-residential units. The Council's Sustainable Design Officer has advised that whilst the non-residential target is acceptable, the residential is not and the applicant's justification cited on the basis that their proposal is in accordance with CfSH Level 4 and 'user preference' is not adequate to justify a departure from the adopted Development Plan policies (which require the lower amount of 90 litres / person / day. Accordingly, in order to address this issue, a suitable worded planning condition is recommended that would allow this matter to be robustly examined at reserved matters stage rather than prematurely omitting the measure. **CONDITION**
- 6.6.21 In terms of rainwater harvesting, a system for irrigation both to the apartment blocks and houses is considered acceptable albeit further details are required

which are recommended to be secured through a planning condition.
CONDITION

Other sustainable design matters

6.6.22 The Council's Sustainable Design Officer notes the following elements of the applicant's approach:

- The applicant has committed to a Site Waste Management Plan with a diversion from landfill target of 85%, which is acceptable subject to a planning condition requiring this.
- The applicant is committed to 'Green Procurement' which is acceptable and welcomed subject to a planning condition requiring this.
- Lifetime Homes – The development will be built to Lifetime Homes. This is acceptable subject to conditions.

6.6.23 On the basis of the above, it is considered that subject to the imposition of the aforementioned planning conditions, the proposed development is consistent with the requirements of the policies of the Development Plan. In order to achieve this, some of these elements, in particular in relation to the delivery of the infrastructure to deliver the LVHN, will need to be secured through the Section 106 Agreement, which is set out in section 6.8 of the report.

6.7 Environmental Impacts and other considerations

Flood Risk / Sustainable Urban Drainage

6.7.1 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere (para 100).

6.7.2 The site is within Flood Zone 1, meaning that the site is assessed as having a less than 1 in 1,000 annual probability of fluvial flooding from main rivers and, in accordance with the NPPF, sequential and exception testing of the proposed development is not required. The NPPF states that a site-specific flood risk assessment (FRA) is required for proposals of 1 hectare or greater in Flood Zone 1. The application site area is 7.9 hectares and therefore a FRA has been provided as part of the applicant's Environmental Statement which includes a section on 'Hydrology and Flood Risk'.

6.7.3 Paragraph 103 of the NPPF states that, when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. London Plan Policy 5.12 *Flood Risk Management* states that development proposals must have regard to measures proposed in Catchment Flood Management Plans.

6.7.4 London Plan Policy 5.13, Core Policy 28 and Policy DMD62 of the Development Management Document seek to achieve greenfield rainwater run-off rates from new development through the integration and deployment of sustainable urban drainage systems. The objective is to help restore a more natural response to rainfall within river catchments, and to address/prevent localised surface water flooding. London Plan Policy 5.13 sets out a hierarchy of sustainable drainage measures, with the aim of managing surface water run-off as close to source as possible. Policy 5.11

Green Roofs and Development Site Environs calls for major developments to incorporate green roofs where feasible and Policy 5.15 *Water Use and Supplies* identifies rainwater harvesting as one of the methods that can help to conserve potable water.

- 6.7.5 Policy DMD62 of the Development Management Document sets out that a Drainage Strategy will be required for all developments to demonstrate how proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan, emphasising that all developments must maximise the use of and, where possible, retrofit Sustainable Drainage Systems (SuDS) which meet the requirements listed in the policy.
- 6.7.6 The applicant's FRA seeks to demonstrate that future occupants of the site will be safe from flooding and the proposed development will not increase flood risk elsewhere. The FRA includes the following measures/features:
- The ground floor levels of new residential development will include a suitable freeboard above surrounding ground levels to prevent the egress of surface water during an extreme rainfall event.
 - The redevelopment of the site will also include appropriate landscaping to redirect overland flow routes away from properties during such an event.
 - A Surface Water Drainage Strategy sets out facilities for the storage of surface water on site and restricted discharge to the local water courses. The systems have been designed up to a 1 in 100 year (1%) annual probability rainfall event, including a margin for potential increases in rainfall intensity and duration as a result of climate change. The Surface Water Drainage Strategy also includes measures to control pollution, such as use of permeable paving acting as a natural filter for water as it infiltrates into the sub-soil.
- 6.7.7 The applicant, therefore, contends that the proposed drainage will provide a substantial improvement compared to the existing drainage regime and will serve to reduce the risk of flooding from surface water at the site. They further highlight that a Construction Environmental Management Plan (CEMP) will be prepared for the site which will serve to mitigate against the potential effects to surface water through construction activity at the site.
- 6.7.8 The Environment Agency (EA) has reviewed the planning application and has raised no objection to it. The EA has recommended six planning conditions to be imposed on any planning permission granted. These are considered to be appropriate and are summarised in turn in the list of conditions at the end of this report, with one exception – one of the condition stipulates that “No infiltration of surface water drainage into the ground at this site is permitted other than with the express written consent of the local planning authority...”. This condition would restrict the ability of the applicant to implement the Sustainable Urban Drainage Scheme proposed which is fundamental to achieving their Surface Water Drainage Strategy, and therefore the wording of it has been altered to reflect this approach.
- 6.7.9 Extensive discussions have taken place both prior to the submission of the application and during the course of the application in relation to the SuDS. The Council's SuDS Officer has advised that an outline Sustainable Drainage Plan 28193-C-504 P4 was submitted in May 2015. This plan was unacceptable on the basis that:

- The controlled discharge rate for a 1 in 1 year event and a 1 in 100 year event (with an allowance for climate change) for the whole site (7ha) was stated to be 92 L/s. Our estimates suggest that the discharged rate, based on greenfield runoff, should be much less at 36 L/s.
- The strategy did not adhere to the London Plan Drainage Hierarchy and included more underground attenuation within geocellular tanks, rather than above ground SuDS features.

6.7.10 The Council's SuDS Officer has advised that the strategy originally submitted for the full planning application for the first phase of the development was similar to the above, but after further discussions and feasibility studies the drainage plan had been updated to include full infiltration using source control and infiltration SuDS features. Accordingly, whilst the SuDS Officer objects to the original details submitted as part of the outline application, they have confirmed that this can be overcome through the submission of an updated outline Sustainable Drainage Strategy with revised SuDS features and discharge rates. The updated Sustainable Drainage Strategy should reflect the approved strategy for Phase 1A, although it is understood that detailed drainage plans for other phases are subject to further feasibility studies such as ground investigation reports, topographical plans and infiltration tests. Planning conditions are recommended to control this matter accordingly.

Air Quality

6.7.11 London Plan Policy 7.14 sets out the Mayor's approach to improving air quality and requires: minimisation of increased exposure to poor air quality; provision to address local problems of air quality; measures to reduce emissions during demolition and construction; proposals to be 'air quality neutral' and not to lead to further deterioration in air quality; ensure on-site provision of measures to reduce emissions; and assessment of the air quality implications of biomass boilers. The Mayor's SPGs168 provide further amplification of air quality issues in relation to this and related London Plan policies. Core Policy 32 and Policy DMD65 of the Development Management Document seek to ensure that development proposals should achieve reductions in pollutant emissions and minimise public exposure to air pollution.

6.7.12 The DMD notes that the whole borough is designated as an Air Quality Management Area (AQMA) with major sources of pollution identified in the Air Quality Action Plan including road traffic and some forms of industry (paragraph 11.1.1).

6.7.13 The applicant's Environmental Statement includes a section on 'Air Quality', which sets out the following:

- An Air Quality and Dust Management Plan (AQDMP) has been prepared for the site which will form part of the Construction Environmental Management Plan for the development.
- Concentrations of nitrogen dioxide and fine particulate matter (PM10 and PM2.5) have been predicted for a number of worst-case locations representing existing and proposed properties adjacent to the road network. Predicted concentrations are below the relevant objectives at all of the existing receptor locations in 2018 (when Phase 1A is due to be completed) and 2026.

- The operational effects of the proposed development are judged to be not significant given the conservative nature of the assessment. Concentrations of nitrogen dioxide from the Energy Centre have been predicted for a number of receptors on the façades of the buildings in Phase 2A of the development. When combined with background concentrations there are no predicted exceedances of nitrogen dioxide objectives. The effect of Energy Centre emissions on air quality for residents of the development is judged to be minor adverse. On that basis the applicant judges that no additional mitigation is required.
- The applicant concludes that the assessment has identified that the air quality effects of construction, the interim scenario and the completed development will not be significant.

6.7.14 The Council's Environmental Health Officer has reviewed the planning application and has raised no objection in relation to air quality, subject to the imposition of a planning condition, which is recommended accordingly. **CONDITION**

Contaminated Land

6.7.15 Paragraph 109 of the NPPF recognises that there is a role for the planning in the remediation and mitigation of derelict and contaminated land. Furthermore, the National Planning Practice Guidance advises that the planning system should ensure that a site is suitable for its new use and prevent unacceptable risk from pollution, and states that as a minimum land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990. Reference is also made to the EU Water Framework Directive. London Plan Policy 5.21 *Contaminated Land* requires appropriate measures to be taken to ensure that the redevelopment of contaminated land does not activate or spread the contamination. Core Policy 32 and Policy DMD66 of the Development Management Document seek to address the risks arising from the reuse of brownfield sites to ensure its use does not result in significant harm to human health or the environment.

6.7.16 The applicant's Environmental Statement includes a section on 'Land and Water Quality' which states that there are no known major sources of contamination or hazardous ground gases within the proposed development areas and, based on both the historical and the current use of the site, the presence of significant concentrations of potential contaminants is judged to be unlikely. The applicant advises that the possible exceptions relate to the areas of former commercial and industrial use which may represent potential sources of contamination.

6.7.17 The Council's Environmental Health Officer has reviewed the planning application and has raised no objection in relation to land contamination, subject to the imposition of a planning condition, which is recommended accordingly. **CONDITION**

Noise and Vibration

6.7.18 London Plan Policy 7.15 sets out criteria by which development proposals should manage noise. These can be summarised as avoiding adverse noise impacts on health and quality of life as a result of new development; mitigating and minimising potential adverse noise impacts

upon new development; improving the acoustic environment; separating new noise sensitive development from major noise sources or, where separation is not possible, apply good acoustic design principles; and to promote new technologies/improved practices to reduce noise at source.

6.7.19 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 matters such as building design, layout of rooms, positioning of building services, landscaping sound insulation, hours of operation and deliveries.

6.7.20 The applicant's Environmental Statement includes a section on 'Noise and Vibration', which sets out the following:

- Unattended and attended environmental noise surveys were undertaken in June 2014 to determine the representative noise climate across the site. A vibration survey was undertaken in August 2014 to investigate the effects of ground-borne vibration resulting from the movement of nearby over-ground trains. A computer rail and road noise model of the site and surrounding areas was prepared and used to evaluate the noise climate across the site, and calibrated/validated with the results of the noise survey.
- Demolition and construction noise has been discussed in general accordance with British Standard 5228 Code of practice for noise and vibration control on construction and open sites and a assessment has been presented indicating potential noise levels from various demolition and construction activities at a range of distances from a construction site over a one hour period. Construction noise and vibration will be managed in accordance with measures included in the Construction Environmental Management Plan – effects may be moderate/minor or even adverse depending on the activities in progress but this will be localised and temporary.
- External amenity spaces (balconies and gardens) for residential premises which overlook the roads or rail tracks are likely to exceed the proposed Lowest Observed Adverse Effect Level (LOAEL) for daytime external noise levels which is a moderate adverse effect. There are no practicable means of reducing this effect, however, given the context and location of the site, these noise levels should be considered acceptable, as agreed with the Council at pre-application stage.
- Mitigation measures are not required with regards to off-site road traffic impacts or train induced vibration levels. The effects of off-site road traffic impacts and train induced vibration are considered to be not significant for the majority of the site. Some dwellings in Falcon Crescent may experience a minor beneficial effect due to the Phase 1C buildings screening road traffic noise from South Street. In the interim scenario, a minor adverse effect may be experienced at Cormorant House and some external areas to maisonettes in Alma Road due to the positioning of the Phase 1A buildings.
- Building services plant should be selected, located and silenced so that the proposed LOAELs are satisfied. Therefore, the effects of plant noise emissions are considered to be not significant.
- The potential effects of noise generated by the restaurant/café and retail units is to expected to be minimised by planning and licencing restrictions and appropriate conditions included within lease agreements/tenants' handbooks. As such, the effects of breakout noise due to the restaurant/café and retail units are considered to be not significant.

- Recommendations have been provided with regards to noise and vibration impacts from the proposed gym in Phase 1A to adjoining residential premises. The measures include suggestions for limiting the operating hours, the layout, the provision of an enhanced floor construction between the gym and residential units, the use of special matting at the free weights area and the incorporation of a tenants' handbook. With these measures implemented through planning conditions, noise and vibration effects should be not significant.
- Additional recommendations in relation to the proposed Community Centre and Youth Centre have been made in relation to reducing noise impact to adjoining residential premises. With these measures implemented through planning conditions, noise and vibration effects should be considered not significant.

6.7.21 The applicant concludes that the noise and vibration effects of the interim scenario i.e. Phase 1A development and the completed development will be not significant, with the exception of a moderate/minor adverse effect due to construction noise, a minor beneficial effect on some dwellings in Falcon Crescent due to the Phase 2A (II) buildings screening road traffic noise from South Street, and, in the interim scenario, a minor adverse effect may be experienced at Cormorant House and some external areas to maisonettes in Alma Road due to the positioning of the Phase 1A buildings.

6.7.22 The Council's Environmental Health Officer has advised that the majority of the issues of environmental concern are broadly addressed by the outline application. The Council's Environmental Health Officer confirms that noise from external sources has been assessed in the Environmental Statement submitted by the applicant; however, in order to ensure that internal noise levels for future residents will be acceptable and that construction noise is not an issue to residents surrounding the development the conditions are required that:

- Stipulate that no demolition, construction or maintenance activities audible at the site boundary of any residential dwelling shall be undertaken outside the hours of 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 Saturday or at any time on Sundays and bank or public holidays (without the prior written approval of the Local Planning Authority);
- No deliveries of construction and demolition materials shall be taken at or despatched from the site outside the following times 08:00 – 18:00 Monday to Friday, 08:00 - 13:00 Saturdays and at no other time except with the prior written approval of the Local Planning Authority;
- The submission of an acoustic report that sets out the sound level generated from kitchen extraction systems and any air conditioning or other ventilation systems and states the noise control measures to be employed to ensure the noise from any of the systems does not exceed a level of 10dB(A) below background noise level measured as L A90 15 minutes during operational hours, at the façade of the nearest residential property;
- The submission of details to ensure that the development is be constructed so as to provide sufficient air-borne and structure-borne sound insulation against externally generated noise and vibration;
- A scheme to address impact noise from the use of free weights and weight machines and exercise classes at the gym as well as music;

- The submission of an acoustic assessment written in line with the latest version of BS5228: Part 1 Code of practice for noise and vibration control on construction and open sites which will focus on the nearest noise affected residential premises and propose mitigation where required to ensure the LAeq 10-Hour does not exceed 75dBA.

6.7.23 On the basis of conditions to ensure the above details are submitted and / or complied with, the Council's Environmental Health Officer is satisfied that the proposed development would not result in a loss of amenity to either existing or new residential occupiers and therefore raises no objection to the application. The conditions are accordingly recommended.

Ecology

6.7.24 Paragraph 118 the NPPF sets out the principles for conserving and enhancing biodiversity, which include resisting development that would cause significant harm that cannot be avoided, mitigated or compensated-for; have an adverse effect on a Site of Special Scientific Interest (SSSI). The NPPF highlights that opportunities to incorporate biodiversity in and around developments are encouraged. London Plan Policy 7.19 echoes the need for development proposals to make a positive contribution to biodiversity, to protect statutory sites, species and habitats, and to help achieve Biodiversity Action Plan targets. Core Policy 36 and Policy DMD78 of the Development management Document require development opportunities, particular on major sites, to maximise opportunities to improve access to nature.

6.7.25 It is evident from the Phase 1 habitat survey that has been completed, along with the submitted arboricultural report of the trees that the site has been designated of "low ecological value" by the applicant's ecologist.

6.7.26 The applicant's Environmental Statement includes a section on 'Ecology, which sets out the following:

- An Extended Phase 1 Habitat survey and further bat surveys have been undertaken to identify the habitats present on site and their potential to support protected or notable species. The highly-modified habitats on site, including buildings, hardstanding, small areas of mown amenity grassland are considered to be of negligible ecological value. Planted trees and shrubs, and two small areas of semi-improved grassland comprise the only areas of vegetation within the site, but these too are of limited ecological value.
- The habitats within the site are considered to be of 'parish/ neighbourhood' value for some common species of birds, including blackbirds. The site is also considered to be of 'parish / neighbourhood' value for reptiles, and the most valuable habitats for this species group will be retained.
- Four of the 36 buildings on site had 'high/ moderate' potential to be used by roosting bats, and 12 buildings had 'low' potential to support roosting bats, as defined in the Bat Survey Good Practice Guidelines. However, a series of dusk emergence and dawn return surveys confirmed the absence of roosting bats at the time of the surveys. A low level of bat activity was recorded, which was largely restricted to commuting bats, and common pipistrelle, soprano pipistrelle and noctule bats along the railway corridor to the east of the site, and the tree-lined embankment along the A110 to the north of the site. Overall, the site is considered to be of 'parish/ neighbourhood' value to the local bat population.

- In accordance with current best practice guidance, the findings of the assessment have confirmed that none of the ecological receptors associated with the site and surrounding area are considered to be sufficiently valuable and/or with the potential to experience significant effects (i.e. none identified with greater than a 'parish / neighbourhood' value).
- 6.7.27 On the basis of the information provided by the applicant, it is considered that they have robustly assessed the impact of the proposed development on existing ecological features and protected species. Accordingly, applying Natural England's (NE) Standing Advice in relation to Protected Species, the proposal is considered to be acceptable.
- 6.7.28 Natural England (NE) has advised that the proposed regeneration of the Alma Estate is not likely to significantly affect the interest features for which the Chingford Reservoirs Site of Special Scientific Interest (SSSI) site is notified.
- 6.7.29 NE has also advised that the proposal presents an opportunity to incorporate features into the design which are beneficial to wildlife such as the incorporation of roosting opportunities for bats, the installation of bird nest boxes or the use of native species in the landscape planting. NE recommends that should the Council be minded to grant planning permission, measures to enhance the biodiversity of the site are secured from the applicant, which is in accordance with Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process. Accordingly, appropriate planning conditions are recommended.
- CONDITIONS

Archaeology

- 6.7.30 Section 12 of the NPPF and London Plan Policy 7.8 emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where necessary undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the decision on the planning application.
- 6.7.31 As set out in the first section, the site lies outside of the Lea Valley Archaeological Priority Area. However, the Greater London Archaeological Advisory Service (GLASS) have advised that a recent study by the Museum of London Archaeology (MOLA) – "Mapping past landscapes in the Lower Lea Valley" (Monograph 55, published 2011) indicates that this is an area that could have been settled during the Bronze Age/Iron Age and later an area of seasonal grazing during the Roman period. As such, GLASS' original consultation response to the application advised that its appraisal using the Greater London Historic Environment Record and information submitted with the application indicated a need for further information to reach an informed

judgment of its impact on heritage assets of archaeological interest. In particular, GLASS stated that:

“The applicant has submitted as part of the Environmental Impact Assessment an Environmental Statement (ES) chapter on Heritage (Chapter 12). The ES Chapter provides a useful chronological history of the site along with a summary of the likely impacts from the proposed scheme; however we would expect the ES Chapter to be supported by a technical appendix comprising a detailed desk-based assessment. As well as consultation with the Greater London Historic Environment Record, which the ES Chapter has reviewed, the deskbase assessment should include a map regression using all available historical maps detailing the historical development within the site, a site visit, an assessment of any available geotechnical data a detailed assessment of the site’s archaeological potential based on past impacts and the predicted nature and significance of the archaeological resource likely to survive within the site. Unfortunately I do not entirely agree with the conclusions of the ES Chapter. Although the 19th/20th-century terraced houses will have affected the archaeological survival within the site, this impact would mostly be localised and, in the absence of knowing if the properties had basements, it cannot be ruled at that archaeological remains survive between the footings of these building and within the rear gardens and former streets. Further to this, any evidence of Bronze Age/Iron Age settlement features if present within the site could be of high significance depending on the extent of survival. In view of the large scale of the development and its location within the Lea Valley, geoarchaeological assessment/evaluation is also necessary in order to establish if there are any ‘wetland’ deposits extending into the site.

6.7.32 In response to these concerns, the applicant submitted two addendums (Part 1 by Terence O’Rourke and dated July 2015 and Part 2 by Wessex Archaeology and dated July 2015) to Chapter 12 of the Environmental Statement which is entitled heritage and deals with archaeological matters.

6.7.33 GLASS has reviewed the additional information and provided the following comments as part of their updated consultation response:

“The submitted documents indicate that there is unlikely to be extensive survival of archaeological remains of high significance within the site. They do however indicate that there is likely to be localised survival across the site in areas outside the modern impacts which were previously back gardens or roads. Part 2 – Geoarchaeological Assessment shows that brickearth is extant within the site particularly towards the east and there is a potential for features cut into the brickearth to survive. In addition to this Part 1 indicates that two chapels were previously located within the site. Although it is probably unlikely for burials to be associated with the chapel based on their dates, in the absence of evidence, further investigation should also include these assets to provide clarification on the presence of human remains. Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two-stage process of archaeological investigation comprising: first,

evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.”

6.7.34 Based on the updated comments from GLASS, therefore, it is considered the archaeological interests of the site would be protected through the use of the condition recommended by them, which is set out below in the list of conditions. CONDITION.

6.8 Planning Obligations and Community Infrastructure Levy

6.8.1 Policies 8.1 and 8.2 of The London Plan (2015) seek to ensure that development proposals make adequate provision for both infrastructure and community facilities that directly relate to the development. Developers will be expected to meet the full cost of facilities required as a consequence of development and to contribute to resolving deficiencies where these would be made worse by development.

6.8.2 A payment or other benefit offered pursuant to a Section 106 Agreement cannot be required unless it complies with the provisions of the Community Infrastructure Levy Regulations 2010 (Regulation 122), which provide that the planning obligation must be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

6.8.3 The NPPF provides further amplification on the Government's position regarding the use of planning obligations, setting out the same tests as above, and advising that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.

6.8.4 Members should note that Section 143 of the Localism Act (2011) came into force on the 15/01/2012, and introduces 'local finance considerations' as a material consideration in planning decisions. A local finance consideration is defined as "grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown".

6.8.5 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:

- Affordable Housing and mix (quantum/ phasing of provision and review mechanism)
- Business and Employment Initiative Contribution
- Childcare Contribution
- Community centre – delivery of replacement
- Education Contribution
- Employment and Training Initiatives Strategy
- Energy – Provision of a standalone energy centre with combined heat and power unit(s), and associated community heating network to supply heat and capable of being extended off site to supply heat to other nearby developments and future connectivity to LVHN
- Highways – various such as Travel Plan, Car Club etc.highway works, bus stops

- Healthcare – delivery of medical centre
- Open Space – strategy for delivery of this and its management and maintenance
- Phasing Plan set out in S106
- Sports facilities contribution
- Sustainable Urban Drainage System
- Youth Centre – delivery of replacement youth centre

6.8.6 This list is not exhaustive and an update on discussions will be provided at the meeting. In particular, the contributions sought by both the Lee Valley Regional Park Authority in relation to the improvements to the bridge that connects the site to the park, and the improvements to local sports facilities as identified by Sport England, are being carefully considered. In relation to the former, Traffic and Transportation have advised that some minor modifications to improve pedestrian and cyclist access from Meridian Way to the bridge are considered feasible, and given the increase in residential units proposed by the application, some form of contribution commensurate with these improvements is considered appropriate. However, wholesale redesign/ replacement of the bridge is not an option at this stage. In relation to the latter, the Council's Planning Policy team has highlighted that NEEAAP Policy 8.1 Enhancing Existing Open Spaces identifies that improvements to the playing pitches at Ponders End Park are required. However, given the development's viability, the level of financial contribution must be considered in this context.

6.8.7 As the aforementioned discussions with the applicant are ongoing, the recommendation to Members, should they be minded to resolve to grant planning permission, is that the decision on the final content of the Section 106 Agreement be delegated to the Head of Development Management / Planning Decisions Manager.

Community Infrastructure Levy

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

6.8.9 The Council is progressing its own CIL and the CIL Draft Charging Schedule was submitted to the Secretary of State on 16th July for independent examination, which is anticipated in November 2015, with subsequent adoption in 2016. As such, this application is not liable to the Council's CIL.

6.9 Other Matters

Equalities Impact

6.9.1 Section 149 of the Equalities Act 2010 created the public sector equality duty. Section 149 states:-

(1) A public authority must, in the exercise of its functions, have due regard to the need to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

6.9.2 Officers have taken this into account in the assessment of this application and the Committee must be mindful of this duty *inter alia* when determining all planning applications.

6.9.3 The consultation process has served to notify all relevant adjoining parties likely to be impacted by the development, as well as existing occupiers within the red line of the application site. 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.

Health Impacts

6.9.4 The applicant has submitted a detailed Health Impact Assessment (HIA) in support of the application. The applicant's HIA sets out how the outline application proposed in terms of the regeneration of the area would have an effect on people's health and wellbeing, highlighting areas in which potential negative health impacts can be mitigated and of course the positive health impacts that can be associated with the development can be enhanced.

6.9.5 The applicant's HIA highlights that the area suffers from a number of factors related to its socio-economic status. These include being area of high deprivation, low employment and overcrowded housing. As has been noted in this report, insofar as the Alma Estate itself is concerned, because of a number of issues such as structural defects and problems associated with the design and layout of the buildings, there is strong support for the redevelopment of the site rather than refurbishment. These issues clearly have a direct correlation in terms of the impacts on residents' health.

6.9.6 In terms of the proposals and how they would impact upon health, the estate's redevelopment is of course the primary factor here. In addition to new and better quality residential accommodation, which from an urban design point of view would be of the form and layout of much higher standard than that which currently exists, the application would result in a range of replaced or new facilities including open space, community facilities, gym and a medical facility. In relation to the proposed development, the strong endorsement from Metropolitan Police in terms of how the design of the scheme would help to reduce opportunities for perception of crime is also noted.

6.9.7 The applicant's HIA sets out that the objectives of the health have been developed through a review of health priorities within local polices and strategies, a review of the current state of health in the area and a review of community consultation undertaken, and that these objectives are presented in the framework established by the London Healthy Urban Development Unit

under the headings of Healthy Housing, Active Travel, Health Environment and Vibrant Neighbourhoods.

- 6.9.8 Accordingly, it is considered that the applicant's HIA sets out a robust assessment of the proposal in relation to health matters.

Human Rights Act

- 6.9.9 In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Planning Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights ("the Convention") directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

- 6.9.10 This report has outlined the consultation that has been undertaken in relation to this planning application and the opportunities for people to make representations to the Council as the local planning authority. The limited number of responses have been fully taken into account in the assessment of the application. Furthermore, both public and private interests have been considered in the exercise of the local planning authority's powers and duties. Officers have also taken into account the mitigation measures governed by planning conditions and the associated Section 106 Agreement planning obligations to be entered into.

7. Conclusion

- 7.1 The Alma Estate is a strategically important site for the Borough and its surroundings. This planning application seeks to establish the principle of the redevelopment of the site for a residential led regeneration masterplan in accordance with the parameters (in terms of layout and height etc) submitted.

- 7.2 The principle of the redevelopment of this site is well established through a range of Development Plan documents, including the London Plan, the Council's Core Strategy and the emerging North east Enfield Area Action Plan. That the red line of the application site covers a number of sites in addition to what would traditionally be considered the Alma Estate itself is supported given the more comprehensive opportunity it presents for the regeneration of the area. Whilst it is noted that a concern has been raised from the owner of one of the 'additional sites', namely Metropolitan Housing Trust, on balance the inclusion of this site and the other sites is considered to be in accordance with the policies and aspirations of the Development Plan.

- 7.3 The applicant has engaged in an extensive pre-application process with both Council officers, the Greater London Authority and local residents. The engagement with local residents through a number of meetings, workshops and visits to other developments is to be lauded and this extensive engagement is likely to have been a strong factor insofar as the lack of any real objection from local residents to the application, which, for a development of this size and scale, is unusual. One could reasonably infer that the lack of

any substantive objection from local residents to this planning application in response to a significant public consultation exercise confirms this approach.

- 7.4 The development proposed would result in a reduction in affordable residential units which the policies of the Development Plan seek to resist. It is clear, however, that the quality of the existing accommodation is poor and the Council's own analysis has concluded that redevelopment as opposed to refurbishment is the preferred solution, a judgement that was reached in part based on consultation and input with local residents.
- 7.5 Whilst there would be an overall loss of affordable housing through the redevelopment in unit numbers, when considered on the basis of floorspace this loss as a proportion is significantly smaller, which reflects the fact that the re-provided space will be of better quality through both size and layout. The development would achieve a ratio of 40% affordable housing overall across the re-provided development which is consistent with the Council's policies.
- 7.6 It is clear that as well as the increase in housing supply that would result from the development, the proposal would also bring about a number of infrastructure improvements to the area, including improved open space and new public realm – in particular the new Station Square and South Street boulevard – retail and gym facilities, a new medical centre and a replacement Community and Youth Centre. All of these factors are considered to weight heavily in the proposed schemes favour.
- 7.7 The design approach advocated which includes a Design Code is considered to be of a high quality, including the provision of a 16 storey high landmark building. Both the Council's Urban Design Officer and the Greater London Authority have endorsed the applicant's design approach and whilst there are some issues to be resolved, overall the application is considered to be acceptable in this regard.
- 7.8 It is the case that the development proposed, if built up the heights and footprints as stipulated in the submitted parameters plans, would have some impact on the amenities of some adjoining occupiers. Conversely, however, the proposed development would also result in some improvements for other residents. On the basis that the impacts are judged to be relatively minor, that these types of impacts are to be anticipated when redeveloping a site in a tight urban context such as this, and that the proposal would result in a number of significant public benefits, it is Officers' view that the application is considered to be acceptable in this regard.
- 7.9 It is acknowledged that the development is unable to deliver a Policy compliant level of housing mix but being 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 scheme. As such that it can be considered that the wider social, environmental and economic benefits of the scheme outweigh any disbenefits in terms of the lack of family accommodation.
- 7.10 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

- 7.11 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 Section 106 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 to follow.

S:\PROJECTS\2014\1405_ALMA ESTATE\01 CAD\02 SHEET LAYOUT\1405_OUT_PL000.DWG



NOTE:
TREE POSITIONS SUBJECT
TO CONFIRMATION OF
SERVICE LOCATIONS



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A Rev CG's to Phase 2 Blocks 17.07.15
Description Date

Project title
ALMA ESTATE

Drawing title
**ILLUSTRATIVE LANDSCAPE
GENERAL ARRANGEMENT PLAN**

Issued By London
Scale 1:1,000 @ A1
Status PLANNING
Date 06.05.2015

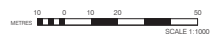
Drawing number
1405_OUT_PL000

T: 020 7978 2101
Drawn EA
Checked OC
Approved LP

Revision
A

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SETTING OUT NOTES
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 For setting out and specification of structure refer to Structural Engineers documents



- 1 Storey
- 2 Storey
- 3 Storey
- 4 Storey
- 5 Storey
- 6 Storey
- 7 Storey
- 8 Storey
- 10 Storey
- 13 Storey
- 16 Storey
- INDICATIVE BUILDING LINE
- STOREY HEIGHT
- INDICATIVE FLUE POSITION (nominal 3m from roof level)

Maximum Storey Height - Residential Only

Storey Height	Maximum Height (m)
2 Storey	7m
3 Storey	10m
4 Storey	13m
5 Storey	16.5m
6 Storey	19m
7 Storey	22m
10 Storey	31m

Maximum Storey Height - Residential and Non-Residential

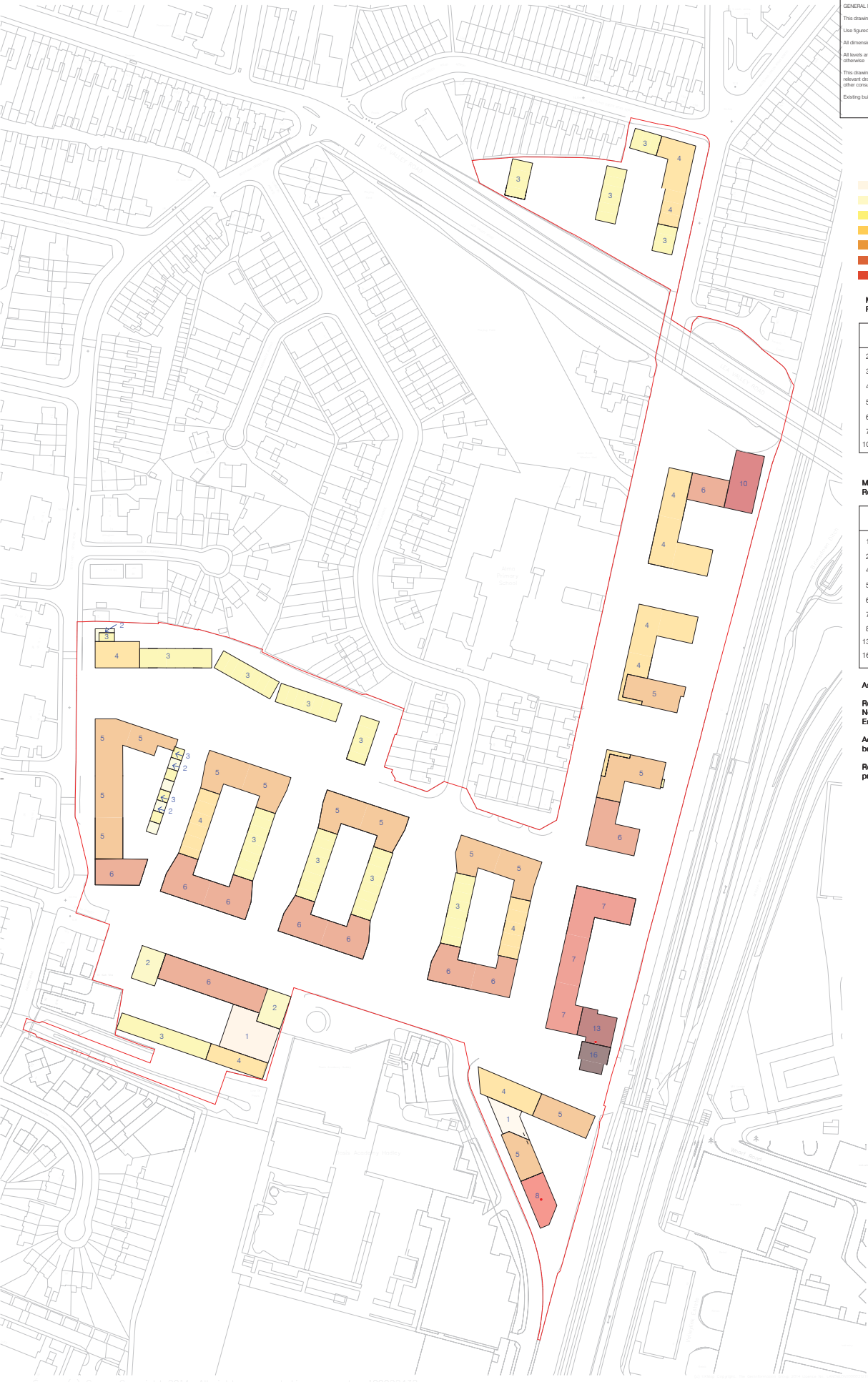
Storey Height	Maximum Height (m)
1 Storey	4.5m
2 Storey	7.5m
4 Storey	14.5m
5 Storey	18m
6 Storey	20.5m
7 Storey	23.5m
8 Storey	27m
13 Storey	43.5m
16 Storey	54m

Assumptions for Storey heights:

- Residential - 3m floor to floor
- Non-Residential - 4.5m floor to floor
- Energy Centre - 5m floor to floor

Additional allowance included for roof build-up and parapet (minimum 1m)

Reprovision of Telecoms equipment to be provided on Landmark Building



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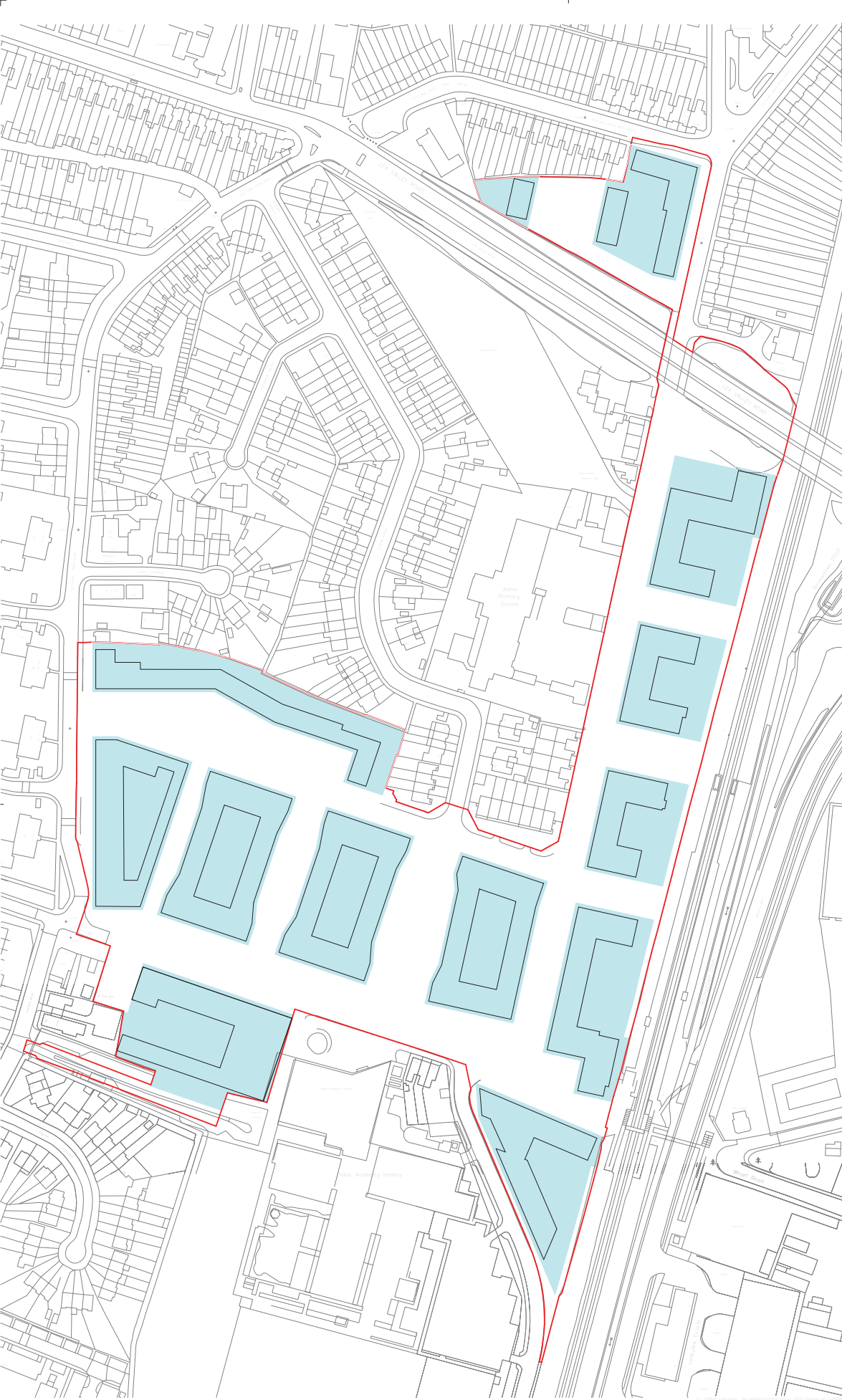
REV	DATE	DESCRIPTION	BY	CHKD
1	17.01.15	Set back included in Phase 3B and building line reduced to allow for 3000gms light line	JV	LB
2	May 2015	RETAL PLANNING ISSUE	JV	LB

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Pollard Thomas Edwards

PROJECT	DATE	REV	SCALE	DATE
Alma Estate Regeneration	12_560	JV	LB	1: 1000@A1 May 2015
Building Heights	560_OUT_PL(00)103			A



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- Development Zones
 - Indicative Building Line
 - Application Boundary
- NB: Minimum 2m defensible space to be provided for all active residential frontages



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REV	DATE	DESCRIPTION	BY	CHECKED
A	15.07.15	Development Zones extended to provide a 2m defensible space. Building line in Phase 3A adjusted to fit Standard Green Road reduced to above 3000mm width line.	JV	LB
B	May 2015	FINAL PLANNING ISSUE	-	-

PLANNING

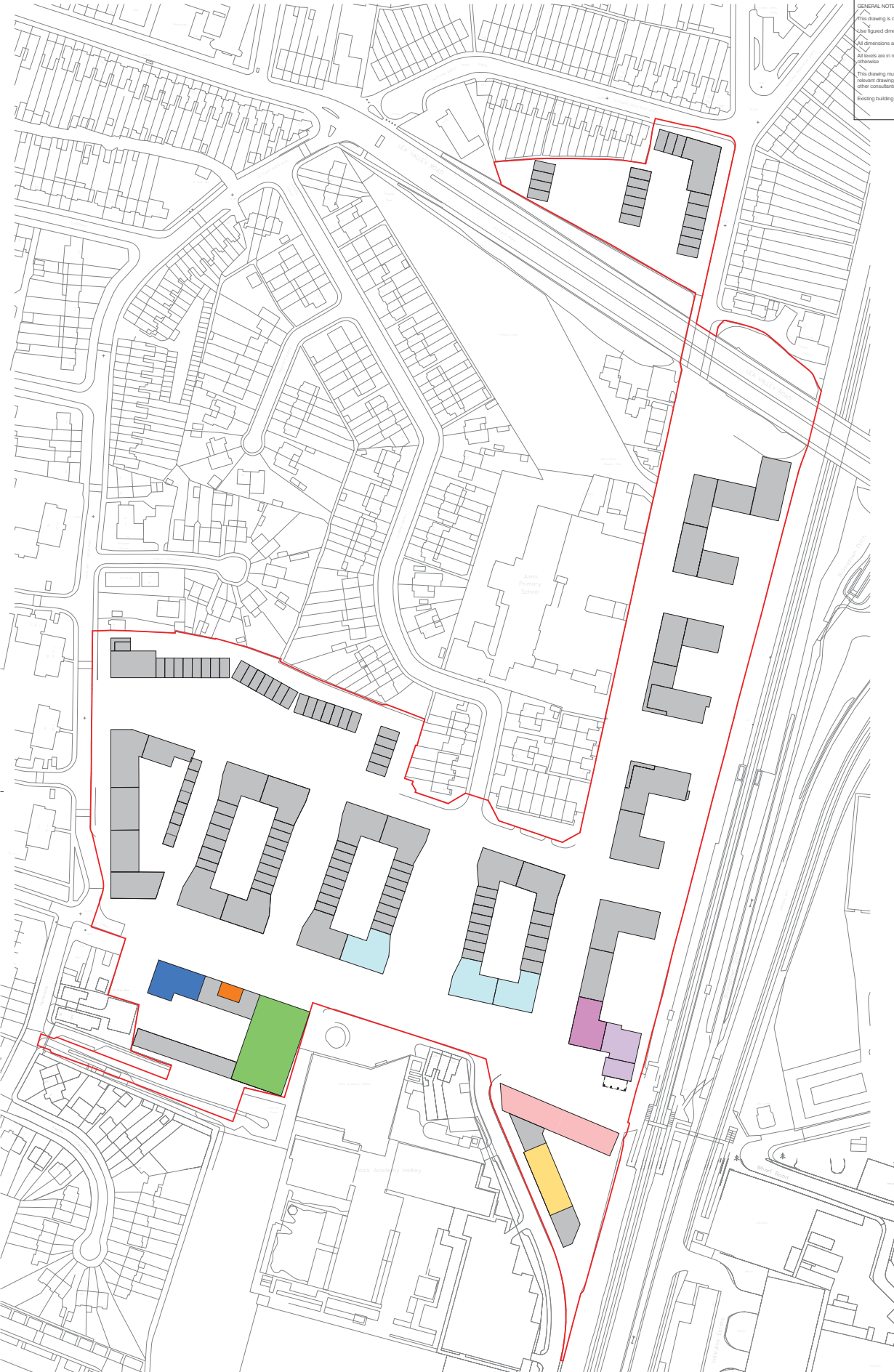
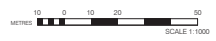
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project	12_560	stage	JV	sheet	LB	date	1: 1000@A1 May 2015
client	Home Estate Regeneration	drawn	LB	checked	LB	rev	A
drawing	Development Zones	file name	560_OUT_PL(00)101	title		rev	A

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Use	Use Class	Area	Note
Community Centre	D1/D2	330m ²	Phase 1C Ground Floor
Youth Centre	D1	1210m ²	Phase 1C Ground + First Floor
Gym	D2	439m ²	Phase 1A Ground + First Floor
Medical Centre	D1	min 532m ²	Phase 1B Ground Floor
Retail	A1/A2	636m ²	Phase 2A + 2B Ground Floor
Community Offices	B1/A2/D1/D2	80m ²	Reprovision of B1/A2/D1/D2 uses
Restaurant/Cafe	A3	150m ²	Phase 1A Ground Floor
Energy Centre		300m ²	Phase 1B Ground Floor
Residential	C3		All Ground and Upper Floors excl. the above

REV	DATE	DESCRIPTION	BY	CHECKED
1	05.08.15	Columns shown on Block 1 (2015)	JV	LB
2	17.07.15	Name changed to Non-Residential Development Use and Building Use in Phase 3A adjacent to 47	JV	LB
3	05.08.15	Outline Green Road reduced to allow 30 degree sight line.	JV	LB
4	May 2015	RETAL PLANNING ISSUE	JV	LB

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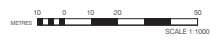
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PROJECT	DATE	ISSUE	SCALE	DATE
Alma Estate Regeneration	12-560	JV	LB	1: 1000@A1 May 2015

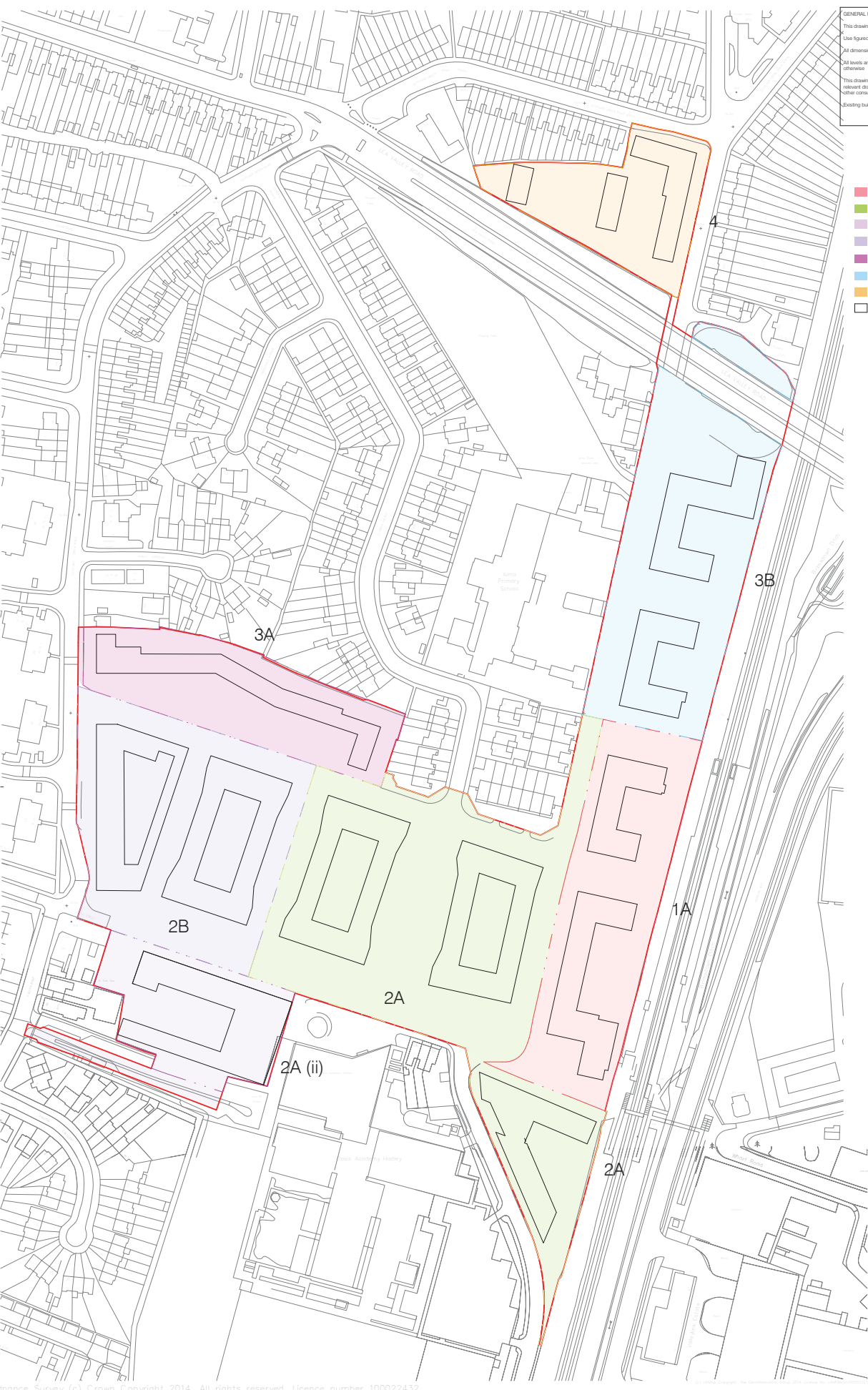
Non-Residential Development Use 560_OUT_PL(00)104 B

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- Phase 1A
- Phase 2A
- Phase 2A (ii)
- Phase 2B
- Phase 3A
- Phase 3B
- Phase 4
- Indicative Building Line



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#	21.07.15	Building line in Phase 3A adjacent to Scotland Green Road has been reduced to allow for 30degree sight line	21	LB
#	30.08.15	Phases amended in line with LSE comments	23	3P
#	May 2015	RETAL PLANNING ISSUE	24	LB
REV	DATE	DESCRIPTION	AM	DATE

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project	Arms Estate Regeneration	stage	12_560 JV LB	date	1: 1000@A1 May 2015
drawing	Development Phases	sheet	560_OUT_PL(00)102	of	B



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 For setting out and specification of structure refer to Structural Engineers documents.



no.	date	description	by	lb
A	17.07.15	Parking layout amended in line with amended parking strategy. Commercial gardens added. Building set back added to Phase 3A and build-line reduced to allow 30 degree sight line from #7 footpath (Green Street)	PT	LB
Z	May 2015	INITIAL PLANNING ISSUE	JV	LB
rev	date	description	dm	aud

PLANNING

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project	Alma Estate Regeneration	plot no.	12_560	sheet	AHM LB	scale	1:1000@A1	date	May 2015
drawing	Indicative Masterplan	title	560_OUT_PL(00)003	rev	A				