

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 1st September 2015

Report of

Assistant Director, Planning &
Environmental Protection

Contact Officer:

Andy Higham Tel: 020 8379 3848
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3857

Ward: Ponders
End

Application Number : 15/02040/FUL

Category: Major Large Scale –
Dwellings

LOCATION: Kestrel House, 15 - 29A And 31 - 45A, Alma Road, EN3

PROPOSAL: 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)).

Applicant Name & Address:

Countryside Properties (UK) Ltd.
C/O Agent

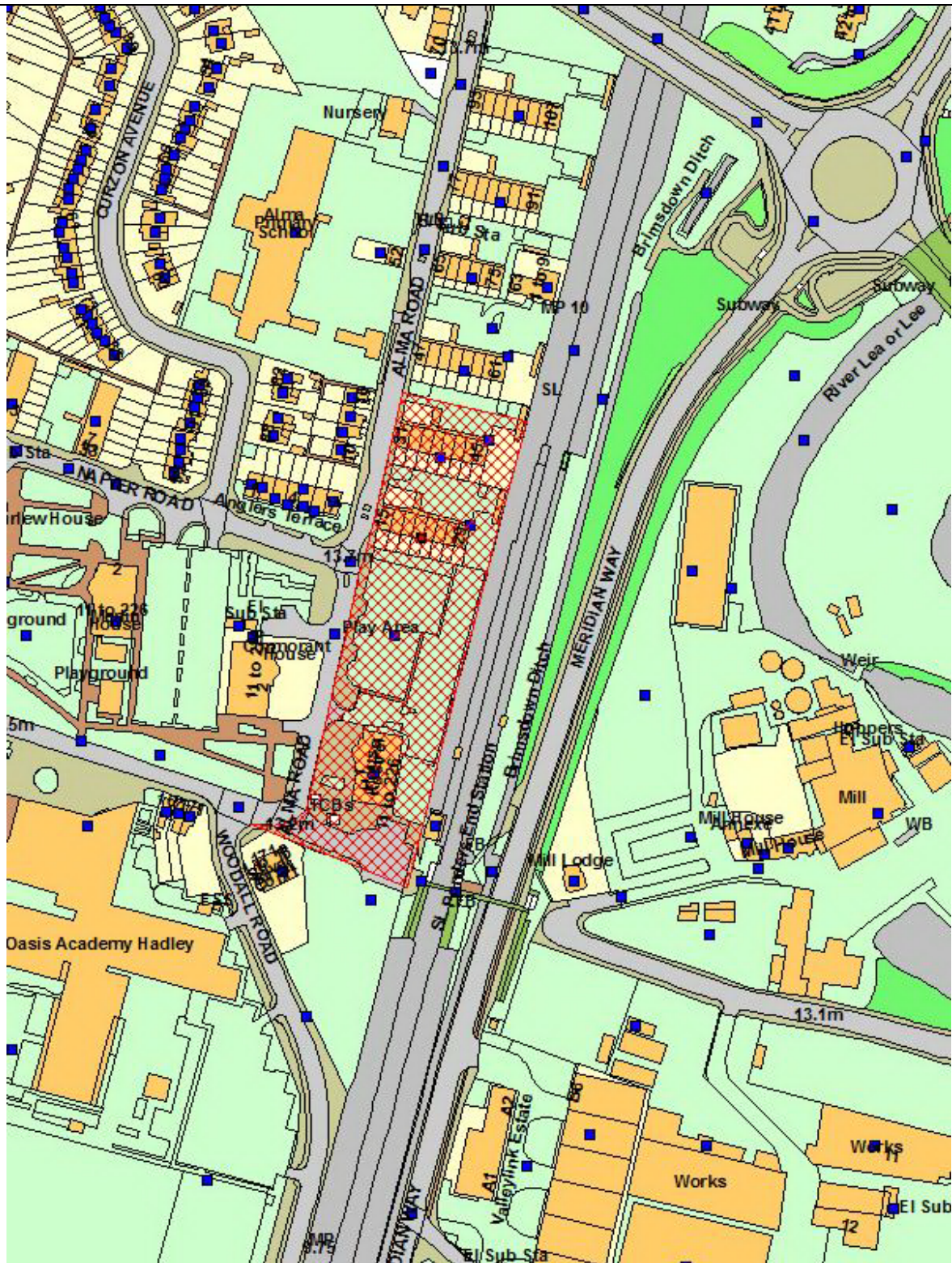
Agent Name & Address:

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 Section 106 Agreement, the Head of Development Management / Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions.

Ref: 15/02040/FUL LOCATION: Kestrel House , 15 - 29A And 31 - 45A , Alma Road, EN3



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Scale 1:2500

North



1. Site and Surroundings

- 1.1 The application site consists of part of the Alma Estate, namely one of the 23 storey high tower blocks, Kestrel House and the first two of the six double stacked maisonette blocks on Alma Road (No.15-29 Alma Road and 31 -45 Alma Road) as well as ancillary facilities including surface car parking, a children's play area, hard and soft landscaping, ancillary storage units for the maisonettes and surface car parking adjacent to Ponders End railway station.
- 1.2 The application site currently accommodates 163 residential units within a site of approximately 1.0 hectares. The site forms part of the wider master plan for the regeneration of the entire Alma Estate, which is subject to a separate outline planning application also being considered at this Planning Committee. The development of this site forms the first phase of that wider master plan regeneration scheme.
- 1.3 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 Park lies to the immediate east of the site, and covers a large area managed by the Lee Valley Regional Park Authority. Alma Road abounds the site to the west, running north-south. 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 and lies just outside of the application site to the south west.
- 1.4 The estate itself was built during the 1960s and none of the existing buildings 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.
- 1.5 Ponders End High Street and Nags Head Road (which links into Lee Valley Road) are part of the Strategic Road Network (SRN). 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 on the proposed regional route of Crossrail 2 that could operate from 2030.
- 1.6 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.

- 1.7 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.
- 1.8 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.

2. Proposal

- 2.1 This is a full planning application for the demolition of the existing 163 residential units and associated works and the construction of two new buildings that will comprise 228 residential units and a mix of commercial floorspace as well as 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.
- 2.2 The application proposes the first phase (known as Phase 1A) of the proposed redevelopment of the entire estate, as set out in the accompanying outline planning application ref. 15/02039/OUT (and considered separately to this application). Unlike the accompanying outline application, this is a detailed application and must be considered on its own individual merits without recourse to the wider outline application.
- 2.3 The applicant's Planning Supporting Statement and other supporting documents confirms that in terms of detail the application proposes:
 - The demolition of the buildings on the site;
 - The erection of 228 new residential units, which would consist of the following:
 - 92 one bed units;
 - 114 two bed units;
 - 21 three bed units;
 - 1 four bed units;
 - 150 sq.m of restaurant/café (Class A3 use) floorspace
 - a 439 sq.m gym (Class D2 use)
 - 105 car parking spaces and cycle provision
 - Public realm improvements
 - 1142 sqm of public open space (including public realm)
 - 1441 sqm of play space (including a LEAP and doorstep play)
 - communal gardens and private amenity space (including balconies and private gardens)
 - a temporary energy centre

2.4 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)

2.5 The outline planning application referred to above 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. 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).

2.6 The applicant has submitted an Environmental Statement which covers the entire development of the outline application. However, the Environmental Statement also covers where relevant matters pursuant specifically to the detailed planning application of the first phase of the development.

2.7 Accordingly, this planning application has been accompanied by an Environmental Statement (in two volumes and including appendices). 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

- 2.8 The Statement includes a consideration of the residual effects, interrelationships, cumulative and non-significant effects. 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

- 2.9 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 this site along with the wider area of the Alma Estate and adjoining sites:
- 3.2 15/02039/OUT – 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, 6, 7, 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)). 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, detailed comments made on outline application.

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.

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

Neighbourhood Regeneration:

- 4.1.5 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.

Tree Officer:

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

Conservation Officer:

- 4.1.7 No objection and fully supports 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:

- 4.1.8 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:

- 4.1.9 No objection, comments that 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

- 4.1.10 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):

- 4.1.11 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 phase is broadly supported in line with London Plan Policy 3.14 and would deliver an uplift in affordable housing units; a step change in housing quality; and, support mixed and balanced communities. However, GLA officers seek further discussion with respect to the decant requirements of this phase, and the maximum reasonable amount of affordable housing across the wider masterplan as a whole.
- Urban design: The design of the proposed regeneration phase is broadly supported and sets a high standard for what is to come in terms of public

realm improvements at Alma Estate and South Street. Internal residential layouts are well considered, and the proposed architecture overall is of a high quality. The approach to scale is acceptable in strategic planning terms, and generally responds well to the surrounding context. Accordingly the design is supported in accordance with London Plan Policy 7.1.

- Inclusive access: The proposed approach to access and inclusion is broadly supported in accordance with London Plan Policy 7.2. The Council is nevertheless encouraged to secure approval of the landscaping details for station square by way of planning condition.
- 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 the carbon dioxide savings within this phase, and the intention to prioritise 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 polices 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; transport infrastructure; and, travel and freight planning to ensure accordance with London Plan polices 6.2, 6.9, 6.10, 6.13 and 6.14.

4.1.12 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 Stage 1, 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:

4.1.13 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:

4.1.14 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:

- 4.1.15 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).
- 4.1.16 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.
- 4.1.17 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:

- 4.1.18 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:

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

London Fire Brigade:

- 4.1.20 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:

- 4.1.21 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:

- 4.1.22 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:

- 4.1.23 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 65 dwellings, equating to 156 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:

- 4.1.24 No objection in principle raised but does 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:

- 4.1.25 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 maximizes 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. One written response has been received, commenting that they support the proposal but raises a number of questions regarding the transition arrangements when the development is being constructed, including in relation to the parking of cars.
- 4.2.2 Responses have also been received from Metropolitan Housing Trust (MHT), who own 63 Alma Road and Longwood Properties London Ltd (Longwood), who own Silver Birch Court. These are, respectively, 'Site 5 – 1-9 Alma Road' and 'Site 4 – Woodall Road' in the outline planning application, two of the 'additional sites' that has been identified to be brought into the overall regeneration Masterplan. An assessment of the comments made by both MHT and Longwood is set out in the committee report for the outline application but these sites do not form part of the red line of this detailed planning application, and so are not directly relevant to its consideration.

Planning Panel:

- 4.2.3 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
 - Housing Supply, Density and Mix
 - Affordable housing
 - Non-residential uses
- ii. Design:
 - Layout, mass, bulk and height
 - 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:
 - Accident statistics
 - Car Club
 - Electric Charging Points
 - Disabled parking
 - Travel Plan
 - Cycle parking facilities
 - Station Square pick up/drop off arrangements
 - Traffic calming in Alma Road
 - Delivery and Servicing Plan
 - Construction and Logistics Plan
 - Traffic impact
 - Speed
 - Pedestrian Access
 - PERS
 - Car Parking
 - Stopping up order
 - Trip generation
 - Buses
 - Vehicular access
 - Refuse and servicing access
 - Cyclists
- 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

- 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. 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 a 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 (2010) (*herein referred to as the 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. Following the EiP, the Council will now undertake further consultation on the Main Modifications to the AAP.

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 relevant to the overall consideration of this application is Proposed Main Modification (PMM) 2, which relations 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. It is noted that this broad support for the principle of the development is shared by a number of key Council departments and partners, such as the Council's Planning Policy department, Neighbourhood Regeneration and the Greater London Authority (GLA).

6.2.17 This detailed planning application forms the first phase of the estate wide regeneration scheme that is subject to a separate outline planning application which is being considered separately by the Planning Committee. Whilst the applications have been prepared and submitted simultaneously, and they are inherently linked, this full planning application must be considered on its own individual merits without having to rely intrinsically on the wider outline planning application. The reason for this is that, put simply, and whilst probably unlikely, it is possible that even if both permissions are granted that this detailed application would be implemented and the following phases approved by the outline permission are not. The above planning policy context gives clear support for the regeneration of the site as a whole and accordingly it is considered that even on its own the first phase of the regeneration as set out in this detailed planning application is acceptable in principle. However, there are of course a number of detailed policies contained within the Development Plan the emerging NEEAAP that the proposed application must be assessed against.

Housing Supply, Density and Mix

6.2.18 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.

- 6.2.19 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 p.a. (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.
- 6.2.20 The application proposes the demolition of the existing 163 residential units and associated works and the construction of two new buildings that will comprise 228 residential units and a mix of commercial floorspace as well as 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.
- 6.2.21 As the development would result in an increase of 65 homes, it would make a notable contribution to the Borough's annual target for the delivery of new residential properties.
- 6.2.22 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.
- 6.2.23 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. Paragraph 3.9 of the applicant's Planning Supporting Statement sets out that the proposed development would have 637 habitable rooms. Based on the site's area of 1.0 hectares, this equates to a 637 hr/ha. This is clearly in excess of the suggested density range contained within the London Plan. Paragraph 4.25 of the applicant's Planning Supporting Statement seeks to justify this higher density, highlighting that:

"[The] proposed increase in overall density of the Phase 1a site is considered to be appropriate given its proximity to Ponders End railway station and the opportunity to provide a landmark building that will act as a signpost' for the station in the wider area and provide a positive focal point for the local community. The delivery of a landmark building in this location responds to key urban design principles as set out in the Design and Access Statement. The proposed density of development is considered acceptable given the

site's sustainable location and high quality design that responds to and enhances the character of the area."

- 6.2.24 Justification advocated by the applicant is noted and agreed with. The location of the proposed development adjacent to the train station does lend itself to a high density scheme especially when considering the opportunity to present a landmark building. Accordingly, notwithstanding that the proposed density of the scheme exceeds that set out in the London Plan, the application is considered acceptable in this regard.
- 6.2.25 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.
- 6.2.26 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 findings of Enfield's Strategic Housing Market Assessment and seek to identify areas of specific housing need within the borough.
- 6.2.27 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%

- 6.2.28 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.
- 6.2.29 The policy goes on to state that in relation to the intermediate sector the Council will seek a range of housing types which we determined on a site by site basis and take into account a range of factors such as development viability. The policy then goes on to highlight that the density of new housing developments should seek a balance between making the most efficient use of land whilst having regard to the quality and character of the existing

neighbourhoods, as well as the accessibility to transport of infrastructure; the policy refers to the London Plan Density Matrix and area action plans for the Borough's strategic growth areas in relation to this matter.

6.2.30 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	65	92	+41	41% increase
2 bed	65	114	+49	75% increase
3 bed	32	21	-11	35% decrease
4 bed+	1	1	0	N/A
Total	163	228	65	40% increase

6.2.31 The table indicates that there is a significant increase in two bedroom properties from the 65 presently on the site to 114 as proposed this. There would also be a significant 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 35%.

6.2.32 The following table shows the mix of units for the proposed development, separating this by tenure and unit size. The percentage figure in brackets represents the percentage of that unit type for that tenure; for example, 42 one-bed flats are proposed for social rent, which represents 43% of the total 97 for the application:

Unit Type	Social Rent	Intermediate	Private	Total
1 bed	42 (43%)	11 (32%)	39 (41%)	92 (40%)
2 bed	40 (41%)	23 (66%)	51 (53%)	114 (50%)
3 bed	14 (14%)	1 (1%)	6 (6%)	21 (9%)
4 bed+	1 (1%)	0 (0%)	0 (0%)	1 (1%)
Total	97 (100%)	35 (100%)	96 (100%)	228 (100%)

6.2.33 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, this the policy aims to deliver 45% of new properties with three bedrooms in the private market housing; the application proposes just 6%. Some 94% this of the new private sector dwellings would be one or two bedroom properties. This is also reflected in the socially rented sector properties with 82% having either one or two bedrooms. Of the scheme as a whole, 90% of the dwellings would have one or two bedrooms this with just 10% being family sized accommodation.

6.2.34 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. The applicant's Affordable Housing Statement, however, relates to the proposals for the outline planning application and does not make a distinction specifically for the mix as set out in the full planning application.

6.2.35 As per the outline planning application, 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 part the Council's Housing and Regeneration department 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.

6.2.36 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 provide an excellent range of dwelling typologies (ranging from one to four-bedrooms) and deliver homes of more generous spatial proportions compared to the existing stock. It is noted that the social rent component of the mix would provide 15% family sized units. This appears low, however, it is acknowledged that this is the most urban/dense part of the masterplan (and therefore the part of the scheme best suited to a weighting towards smaller unit sizes). Furthermore, it is noted that as a whole the proposed estate regeneration would deliver an uplift in affordable family housing (refer to GLA report D&P/3481/01). Accordingly, GLA officers are of the view that the mix is broadly acceptable in accordance with the principles of London Plan Policy 3.8. Nevertheless, in the absence of a confirmed existing residential schedule at this stage, GLA officers would welcome further discussion with the applicant team with respect to verifying that the decant needs arising from this phase would be appropriately met." (Paragraph 23)

6.2.37 The Council's Planning Policy team have reviewed the application and they highlight that the applicants were advised at the pre-application stage to explore opportunities for increasing the provision of family units through the delivery of ground/first floor maisonettes, but this has not been pursued. The Council's Planning Policy team have also commented that further clarification should be sought as to approach aligned with the submitted viability information and decant strategy to determine optimum levels that can be achieved.

6.2.38 The comments of the GLA in relation to high proportion of smaller units are noted, but also that this development, being located so closely to the train station in the areas of highest public transport accessibility does lend itself to smaller accommodation.

6.2.39 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.

6.2.40 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.

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

- *"The financial viability model prepared by the applicant's consultant's shows that the first phase generates an anticipated deficit of -£552,274. We have reviewed the proposed income and cost figures and we accept that this assessment accurately models the viability of this phase.*
- *We have re-run the appraisal for the first phase and adjusted the tenure mix to reach a policy compliant level. Assuming no change to the overall residential floor area. A policy compliant tenure mix of social rent units would require a greater number of larger units (3 and 4 bed), the total floor area of social rent tenure would consequently increase over the level currently proposed. This increase would have to be met through a corresponding decrease in the area for private sale housing. Modelling the impact of these changes, we can see that there would be a substantial scheme deficit of circa £8 million compared to the current forecast deficit of £552,274. On this basis, we conclude that any movement towards a more fully policy compliant mix would not be financially viable."*

6.2.42 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 a number of factors, including the development's viability.

6.2.43 A further factor of importance in terms of the housing unit size, and indeed the proportion of affordable housing, is the decant programme of the Council in relation to existing social rent tenants. The Council's decant programme has been a significant factor in determining the housing mix of the affordable social rent units, and this in part explains why the majority of these tenure of units would have one or two bedrooms. Newlon and Countryside's argument are based more on market demand for their respective tenures, but the higher number of affordable units as a proportion of the application as a whole (see following section below for further analysis of this) in effect skews the overall percentage of smaller units across the whole application.

6.2.44 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. As such, on balance it is considered that the application is acceptable with regard to the proposed housing mix.

Affordable Housing – amount and tenure split

- 6.2.45 Policy 2.14 of the London Plan, instructing 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.’
- 6.2.46 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).
- 6.2.47 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.
- 6.2.48 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.”*
- 6.2.49 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 re-provision 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.
- 6.2.50 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.

6.2.51 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).

6.2.52 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.”

6.2.53 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.”

6.2.54 The 163 existing units are either owned by the Council (Social rent) or are in private ownership (Market).

Unit type	Social rent	Market	TOTAL	%
One bedroom	60	5	65	92
Two bedroom	61	4	65	93
Three bedroom	6	26	32	23
Four bedroom	1	0	1	100
TOTAL	128	35	163	78

6.2.55 As can be seen from the table above, the clear majority of the existing dwellings, some 78%, are Council managed socially rented, with the remainder being private market units – this compares to 74% of the entire estate and additional sites as covered by the outline planning application. 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.

6.2.56 The following table sets out the proposed schedule of accommodation for the full application:

Unit type	Social rent	Intermediate	Market	TOTAL
One bedroom	42	11	39	92
Two bedroom	40	23	51	114
Three bedroom	14	1	6	21
Four bedroom	1	0	0	1
Total units	97	35	96	228

6.2.57 As can be seen from the table above, the total number of social rented units would fall from 128 to 97. However, when including the proposed 35 intermediate properties then the total number of affordable housing properties delivered through this planning application would increase by five to 132. As proportion of the total number of units delivered, the level of affordable housing in both the socially rented and intermediate tenure would be 58%. The level of affordable housing would therefore be significantly higher than the Council’s target of 40%.

6.2.58 As set out in the accompanying report, the level of affordable housing across the development in the outline planning application has been assessed having regard in particular to London Plan Policy 3.14. It is acknowledged that the outline planning application achieves the 40% policy target, but it is noted that levels through individual phases may exceed or be lower. This phase of the development, albeit proposed for a standalone detailed planning application, achieves a relatively high proportion of affordable housing which on its own is compliant with the Development Plan policies. Accordingly, in terms of the provision of affordable housing, the application is considered to be acceptable.

6.2.59 Insofar as the affordable housing tenure split is concerned within the 132 units proposed, this would be 73% social rent and 27% intermediate. This

ratio is in complete accordance with Core Policy 5 of the Core Strategy which 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. Clearly, the proposed development is in accordance with the London Plan policy also.

Non-residential uses

- 6.2.60 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).
- 6.2.61 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.
- 6.2.62 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 as on the adopted policies map.
- 6.2.63 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 this application, and the medical centre (minimum of 532 m² to maximum of 833 m²) on the south side that will be delivered in the second phase of the development as set out in the outline planning application (and so is not form part of this application). There will also 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, again the latter to be delivered as part of the outline application.

6.2.64 Insofar as the non-residential uses proposed as part of this application alone (i.e. without reference to the facilities that are proposed as part of the wider outline application) it is considered that the combination of the retail and gym would add to the overall quality of the development. The non-residential uses would be located on the ground and first floors of the building that would front onto the new Station Square – which also forms part of this application as well – and when taken together, would create quality civic space. Whilst this space will of course benefit from the other uses that are proposed as part of the outline planning application, even when considered in isolation they are considered to create a quality civic space.

6.2.65 The extent of the commercial floorspace along with their proposed location to create new civic space are all welcome and considered to be in accordance with the relevant policies of the Development Plan.

6.3 Design

Layout, mass, bulk and height

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 exceeds that set out in the London Plan policy, but that in terms of the principle of the development that this is considered to be acceptable. In order to properly address the broader policy requirements for new development, and bearing in mind that the proposed density of the development would exceed that suggested in the London Plan, 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 Unlike the accompanying outline application, this application is a detailed one and therefore the information submitted must be assessed and determined. Whilst the scheme is considered in the context of the overall masterplan for the regeneration of the site – and the majority of the applicant’s submission documents indicate on this basis – as the proposed development is a full application the later phases of the development authorised by the outline planning application (should it be granted) may not necessarily be constructed, the application must be considered on its own individual merits. Having said this, however, as the proposed development should constitute the first phase of the overall master plan, and forming a particularly important part of it in relation to the train station and the new civic space referred to, it is welcomed that it is submitted in detail.
- 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. The Council’s Urban Design Officer has 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 The applicant’s Design and Access Statement highlights the following approach for the design of the first phase of the development proposed by this application:

- Proposals for Phase 1A create two urban blocks arranged around a communal green space at the centre of the block. The urban blocks are designed to create a clearly defined frontage onto Alma Road, and are opened to the rear to provide views of the Lea Valley Nature Reserve.
- The open spaces between each block creates two 'green fingers' along Alma Road, as well as an attractive landscaped outlook from apartments. The proposed site layout also opens up a view of the historic Ponders End Flour Mill from Alma and Napier Road.
- At the south end of Phase 1A, the buildings create an active frontage onto a new square in front of Ponders End Railway Station. The new square, signalled by a landmark building, creates a real presence and focal point for this important entrance into Ponders End.

6.3.7 The layout proposed would consist of two individual buildings divided into six separate self-contained blocks (numbered, somewhat obscurely, as 1, 2, 25, 3, 4 and 5), with ground floor units proposed also. Each block would have its own individual access point, bin and cycle storage.

6.3.8 It is considered that the proposed buildings would create a strong frontage along Alma Road where the existing maisonette blocks do not (with their sides facing the main road). The southern building would face south onto the new created Station Square with non-residential uses (as referred to above) helping to create a strong civic space in conjunction with the railway station. The layout of the proposed buildings would also help to maximise views through to the Lee Valley Regional Park, affording some on-street car parking on Alma Road but with the majority in private car parking courts at the rear of the buildings. The Council's Urban Design Officer has commented that the development would integrate with its existing context, maintaining views along Napier Road to the listed flour mills and visual connectivity along South Street to the station.

6.3.9 The applicant's Design and Access Statement sets out that the key aspects of the proposed massing strategy are:

- A 16-storey landmark building to signpost Ponders End Railway Station and the pedestrian bridge linking to the Lea Valley Nature Reserve. It is worth noting that the proposed landmark building is significantly lower than the existing 23 storey tower block in this location. Moreover, the form will be articulated into more slender volumes and will be orientated and designed to create active frontages at ground floor level.
- A 7-storey medium rise apartment building connecting to the landmark building, forming the remaining frontage onto Station Square.
- A critical massing relationship is between the proposed and the existing buildings on the west side of Alma Road. The proposed massing has therefore been designed to step down in scale from 7 storeys at the station end of the site to 5 storeys opposite the existing houses. This reflects the existing massing relationship in front of the houses, which currently face the flank wall of the existing 4-storey maisonette blocks on the Alma estate.

6.3.10 An image from the applicant's Design and Access Statement indicates this:



6.3.11 The proposed 'landmark' building would be 16 storeys high, which, whilst being taller than the majority of the surrounding development, would of course be significantly smaller than the 23 storey high Kestrel House which would be demolished, and the remaining three other towers, as highlighted by the applicant. This is considered to be acceptable with the Council's Urban Design Officer commenting that they would be of an appropriate scale and would help to mark the presence of the station and the route to the Lee Valley Regional Park. The Council's Urban Design Officer has also commented that the proposed tower would be well-positioned to enable it to be viewed as a landmark when viewed along South Street, including 'the clever use of a colonnade to increase visibility of the station and thus aids legibility within the wider area.'

6.3.12 It is considered that in massing terms the proposed tower element would be appropriate as it would be broken down into distinct elements: the tallest being 16 storeys with a lower section of 12 storeys and then linking into the seven storey main building. By accentuating the height of the tower compared to the surrounding adjoining buildings it is considered that this would create the eloquence required for this development.

6.3.13 The Council's Urban Design Officer has commented that the adjoining seven storey element is quite bulky, but that the proposed architectural treatment successfully breaks this element into discrete residential blocks, and that:

"Blocks 4 and 5, at between 4 and 6 stories [sic] push the boundary of what is acceptable when considering the immediate context of the houses opposite on Alma and Napier Roads. However, this is mitigated somewhat by the set-back within the 5th storey of block 5 and in the context of the wider regeneration scheme they are appropriate. The net result will be a development of a much more human scale than the existing (despite increased separation of the latter) with properly enclosed and active streets. Street trees will also help to mitigate more marked changes in scale across the street."

6.3.14 It is considered that the massing of the proposed development would, on balance, be appropriate. There is clear support the taller element as set out above, and whilst noting the Council's Urban Design Officer's concerns regarding the bulkiness of the seven storey element, given the existing

context in relation to Cormorant House and the proposed perimeter block which will replace this as part of a later phase of the overall regeneration of the site, it is considered that this would be acceptable. The context of the Northern block within the site is slightly different insofar as being opposite to the smaller two storey properties of 10-14 Alma Road, and these impacts in terms of neighbouring amenity considered in the next section of the report. However, in design terms of the proposed development is considered to be acceptable in this regard.

- 6.3.15 In terms of the elevational appearance, the applicant has set out that the design concept is a contemporary interpretation of the traditional London mansion block. They have stated that:

“To reduce the visual bulk of each block, we have articulated the façade and roof form with bays and indented roof forms (which also provide roof-top terraces for some homes). The residential scale is emphasised with a lighter coloured brick to the first two floors. Staggered balconies add interest to the street elevation and improve daylight to room interiors.”

- 6.3.16 The applicant is proposing simple elevations but with different tones of high quality brickwork. There are three separate characters for the elevational appearance, consisting of 'Alma Road', 'residential courtyards' and 'landmark building' which relate to the prominence of the building/elevation in question. The Council's Urban Design Officer has broadly welcomed the design of the proposal in terms of the elevational appearance, commenting that the front elevations (i.e. Alma Road) in particular are very good. Minor concerns have been raised with regard to the upper floor setback where in some instances it appears as though the proposed brick pattern has not been applied. It is noted that the applicant has explained that this is to prevent residents climbing onto the roof, given this and the limited instances where this issue actually occurs its visual prominence would be limited, and therefore no objection is raised in this regard.

- 6.3.17 The Council's Urban Design Officer has raised some concerns over the proposed rear elevations (i.e. Courtyard), commenting that changes in materials and shadow lines are not used so successfully to break up the building mass. However, the elevations are shorter and are broken up with built projections and therefore considered acceptable, as well as not being on a prominent front elevation.

- 6.3.18 The GLA are broadly supportive of the applicant's design approach, commenting that:

“... the proposed approach would provide a tall building of distinction, whilst also ensuring that it would relate well to its context and the form and materiality of the other new buildings coming forward as part of the masterplan.”

- 6.3.19 In terms of access it is noted that approximately half of the ground floor units fronting the public realm have direct access to the street. Whilst this is good, along with the number of entrances and windows, it is perhaps disappointing that this number is not greater but on balance is considered to be acceptable. The layout of the ground floor of the southern block successfully activates all frontages with commercial uses and residential entrances and would help to create a good level of activity and overlooking onto the new Station Square.

6.3.20 The Council's Urban Design Officer has commented that there is some lack of clarity in relation to the proposed boundary treatments and in particular the positions of gates and lines of security, where the diagram to the key on the landscape plans is difficult to interpret. The open space between blocks 3 and 4 on Alma Road is proposed as communal gardens for use by residents only, but it is not clear on the type of enclosure proposed, nor how this will interact with the private amenity spaces associated with ground floor residential units. The boundary will need to be high enough to prevent people climbing over (preferably a low wall with railings above to approximately 2m in height and a fob/code-accessed gate), but the private spaces will be much lower. The applicant has confirmed that they are happy to update these details and would accept a planning condition in relation to boundary treatment would require the submission to the Council for our review and approval. Such a condition is recommended and as such this matter is considered to have been addressed.

6.3.21 It is noted that it is proposed that some flats have individual bin storage within their front gardens. This has the potential to result in visual clutter and therefore a planning condition is recommended to ensure that details of appropriate screening would be in place.

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

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 The applicant has set out in their Design and Access Statement and other documents that the dwelling layouts have been developed in close consultation with existing residents through the pre-application engagement process who will move back onto the development as part of the decant programme. The applicant highlights that in particular some residents did not want to lose the ability to have a separate kitchen, which they enjoy in their current homes. Accordingly, a number of the dwelling layouts have therefore been developed to provide separate kitchens with a window, and as a consequence this has resulted in some minor non-compliance with the Mayor's Housing SPG.

6.3.31 All units meet the minimum internal space standards. However, 181 units would not comply fully with the Mayor's Housing SPG in terms of the detailed internal layout. There would only be three areas of the layout that would not comply, which are: dresser rather than desk provided in double bedroom; no space to accommodate a desk or dresser in twin bedroom; and, no space to accommodate 1no. bedside table in twin bedroom. Accordingly, given the context in terms of responding to areas of specific requests from existing residents, and that the actual impact in terms of non-compliance is restricted to three relatively modest areas, this approach is considered to be acceptable.

6.3.32 The Council's Urban Design Officer has commented that Block 5. Flat 5:23, does not appear to have enough amenity space as a single element and that subsequent evidence submitted by the applicant does not demonstrate that the family could arrange a table and chairs on the balcony. While, additional space is provided within the flat, it is felt that the required amenity space could have been achieved through revising the layout. The applicant has responded to this comment by advising that the terrace in question was

reduced in size when Block 5 was amended to incorporate a setback floor (this matter is assessed as part of the impact on neighbouring amenity section). The applicant has confirmed that the terrace would have an area of 4.5m², which falls below the required standard of LHDG requires 8m² for a 3B5P. However, they highlight that the Mayor's Housing SPG advises that in certain circumstances a unit "...may instead be provided with additional internal living space equivalent to the private open space...", where this particular unit would have 38m² of living space, 9m² over the minimum standard, and so consistent with the advice of the SPG; the overall GIA of the flat would meet the minimum floorspace standard. Furthermore, they highlight that the terrace would also be 1.5m deep which would be sufficient for a table and chairs to be located here. Given this, this minor digression from the required standards is considered to be acceptable.

- 6.3.33 Aside from the above, the application is considered to be of a high quality that would either meet or exceed the requirements of the London Plan and Mayor's Housing SPG. The GLA have made the following comment, which is concurred with:

"The detailed floorplate layouts provided demonstrate that residential quality across the phase would be high- with generous space standards, high quality ground floor entrances, optimised unit to core ratios and a high proportion of dual aspect units."

- 6.3.34 In terms of the level of day light and sunlight that the proposed residential units would experience, this is set out in the applicant's Environmental Statement, which includes an analysis which has been undertaken with regard for the guidance by the Building Research Establishment (BRE) and local planning policy. The Environmental Statement underlines that 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 of the residential units which are presently on the site and 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.

- 6.3.35 The Environmental Statement sets out the applicant assessment for the interior daylight and sunlight levels of the residential accommodation within the proposed development, as well as the proposed amenity areas. The Environmental Statement states:

- The analysis results show that, using the ADF test, 522 (78%) of the 671 rooms assessed would meet the target values set out in BS8206 and the Code for Sustainable Homes. Using the Daylight Distribution detailed in the Code for Sustainable Homes, the results show that 564 (84%) of the rooms assessed would comply with the target of at least 80% of the room receiving access to direct daylight. These results demonstrate a high compliance and are considered good in an urban environment such as this.

- In terms of sunlight amenity, the results show that 73% of the rooms assessed would fully comply with the BRE Report guidelines for sunlight amenity. Receiving at least 25% APSH including at least 5% during the winter months. These results are considered good in an urban environment.
- Analysis shows that all five of the amenity areas assessed will fully comply with the BRE Report guidelines, with well in excess of 50% of their areas receiving at least 2 hours of direct sunlight on March 21st. The transient overshadowing results show that on March 21st these amenity areas will receive early morning sunlight, although, due to their orientation, they will be overshadowed in the evening. On June 21st the transient overshadowing results show direct sunlight to all 5 amenity areas until at least 14:00.

6.3.36 The analysis shows, therefore, that the proposed scheme would achieve a good level of compliance with the BRE standards and therefore would receive daylight and sunlight amenity consistent with expectations of an urban area.

6.3.37 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.

Inclusive Access

6.3.38 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. It is noted, 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'. The Government's changes to the accessibility and wheelchair housing standards as set out in the Planning Practice Guidance do not come into effect until the 1st October, and the Examination in Public (EiP) of the Minor Alterations to the London Plan is not does to take place until the 21st October, and therefore the changes to the Plan will take affect after this date. Accordingly, the application is assessed against the existing planning policies

6.3.39 The applicant's Design and Access Statement commits that 10% of the dwellings would be provided as wheelchair adoptable homes and in accordance with the accommodation schedule, the units are spread across a range of tenures including private sale, shared ownership and affordable rented. In addition all of the units have been designed to each of the 16 criteria of Lifetime Homes ensuring that a sufficient amount of consideration has been given to ensure that the development is capable of adapting to the changing needs of its population over their lifetime, again creating a highly flexible, functional and sustainable for of development consistent with the aims of Policies CP4 and CP30 of the Core Strategy and Policy 3.8 of the London Plan.

Children's Playspace

- 6.3.40 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 90 for the development. On this basis, the SPG indicates that the development would need to make provision for 900 m² of children's play and informal recreation space.
- 6.3.41 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 Design and Access Statement sets out the proposed open space and play strategy for the scheme, and demonstrates that the masterplan would accommodate 1,322 m² of children's play space, thereby exceeding that required by the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG. This would include the following a large play space to occupy the site at its northern end, which will link into to a larger play space strategy as part of the overall masterplan for the regeneration of the site as proposed by the outline application.
- 6.3.42 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.
- 6.3.43 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.

Landscaping and public realm, including Arboricultural Assessment

- 6.3.44 The applicant's landscaping and public realm strategy is set out in their Design and Access Statement. This highlights the following key objectives of their strategy:
- To activate a new civic space outside Ponders End railway station and create a gateway to the area;
 - To offer a variety of play opportunities both in public space as well as smaller 'door step' play, and ensure temporary play is provided whilst phasing of development takes place;
 - To compliment public space with enhanced communal and private gardens, offering increased security and private parking;
 - To improve movement and connections across the Estate and enhance and enable pedestrian movement using shared space principles and permeable street design;
 - To enhance green infrastructure via a series of connected green spaces, planting beds and comprehensive street tree strategy that offers a range of habitats;
 - To promote a sustainable urban drainage strategy across the site with rain gardens and permeable paving where appropriate;
 - To follow 'Secure by Design' Principles to ensure a safe neighbourhood. Spaces are designed to be overlooked to give a natural level of

surveillance, with good visibility around corners, with increased permeability and reduction in the amount of undefined open spaces, to have well lit safe night time routes and have good exit strategies and view channels to improve perception of safety in the area.

6.3.45 A key part the applicant's public realm strategy is the provision of a new civic space to the south of the new buildings adjacent to Ponders End railway station. The delivery of this key public realm improvements should help to set a high benchmark the quality of the development coming forward as set out in the wider outline planning condition. In relation to Station Square, the applicant's Design and Access Statement sets out that:

- Station Square is the gateway to the Alma Estate Regeneration Project, and is proposed as a new pedestrian friendly space. A gym and a café will support a busy and animated public space. To make the space more attractive, tree planting will take place, accompanied by rain garden planting beds and a variety of seating opportunities to encourage stopping and pausing in the new square. Generally, the seating is orientated against the edge of the square, with a sculpture proposed at the centre of the square, and as a landmark at the end of South Street.
- The large civic space also serves as access and servicing for commercial ground floor properties and as such spaces will be provided for tables and chairs to spill out into the public space. Effective lighting will also the space to be safe and accessible in the evenings, and support a safer environment around Alma Estate.
- The design and materials should complement the treatment of this gateway Plaza to provide continuity in character along South Street whilst providing an appropriate impression of quality, setting the standard for the new neighbourhood. New trees will be introduced to frame the residential apartments but also species selection will match South Street to aid way finding and have visual connectivity across the site.

6.3.46 Generally speaking the concept for the new civic space is well developed and supported. It is noted that the GLA have given support for this also noting its robust and durable Avenue in character for this arrival space. The new Station Square forms the principal element of the public realm for the development as proposed by this application. Whilst the applicant has designed their public realm strategy to cover the entire redeveloped estate, if developed in isolation of this it is still considered that the proposed Station Square on its own would still be of high quality and form an appropriate design solution to this part of the application site. In terms of the rest of the landscaping and public realm strategy, it is noted that this would respond positively to the predominantly residential character, and as noted above, would allow use through the site into the adjoining Lee Value Regional Park (and listed flour mill and Conservation Area).

6.3.47 The applicant has set out that a comprehensive Tree Survey has been undertaken which has informed the proposed development. The survey identified that 23 trees contained within the Phase 1A site were assessed to be Value Category B or below. As such, the applicant proposes that as the majority of the trees within the Phase 1A site are of low quality they will be removed to make way for the new development which includes 77 trees of different species 'that will reflect the character of each of the different landscaped areas and the local character of the Regional Lea Valley Park'.

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 a new use 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 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. Policy DMD10 of the Development Management Document 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
Minimum distance between rear facing windows (m)	22	22	25	22	25	30

6.4.2 A development of this size will clearly have a significant impact on the surrounding properties, but must be considered in the context of the existing

buildings which are to be demolished being 23 storeys high in the case of Kestrel House in particular.

- 6.4.3 Despite being discussed at pre-application stage, a number of the applicant's submission documents, in particular the Design and Access Statement and submitted drawings, do not set out the proposed development in the existing context, but rather frame it as part of the wider regeneration masterplan. As such, the applicant has not sought to justify the first phase of the development as a stand-alone planning application in relation to the impact it would have the existing neighbouring properties.
- 6.4.4 The applicant's Environmental Statement, however, does set 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 Interim Scenario). An assessment of this issue must be undertaken of course as the proposed development is a full application and, whilst one would hope this would be unlikely, the later phases of the development authorised by the outline planning application (should they be granted) may not necessarily be constructed.
- 6.4.5 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. 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.

Impact upon Cormorant House

- 6.4.6 The application proposes the demolition of the existing 23 story high tower Kestrel House, which clearly has a significant impact in terms of its scale, bulk and massing. Presently, Kestrel House lies approximately 40m to the East of Cormorant House. The proposed 16 storey high building would be located in and not dissimilar location to Kestrel House, although slightly to the east and closer to the railway station and line. Given this, it is considered that the proposed 16 storey high building would have a reduced impact upon Cormorant House and therefore the application is acceptable in this regard.
- 6.4.7 The building would drop down to 12 storeys to the north and then interconnect to a seven storey high building which would front onto Alma Road. At its closest point the proposed new building would be located approximately 32.5m from Cormorant House. Given the juxtaposition between Cormorant House and the proposed seven storey high building

which would comply with Policy DMD10 of the Development Management Document, this relationship again is considered to be acceptable.

Impact upon 47-61 Alma Road

- 6.4.8 The application then proposes the demolition of two of the four storey high maisonette blocks at the southern end of Alma Road (those due north of Kestrel House). In their place the application proposes a U shaped block that would front onto Alma Road, being six storeys high in its southern half and then dropping down to five storeys in its northern section.
- 6.4.9 The proposed new building would be located immediately due south of 47-61 Alma Road with a distance of approximately 30m. Due to the layout of the existing maisonette block, its southern facade is a mixture of habitable and non-habitable rooms which, because of its orientation in relation to the car parking court which is accessed from Alma Road, it is in essence a public elevation. The proposed building would be one storey higher than 47-61 Alma Road and because of its orientation to the south it would have a greater effect with regards to overshadowing and overbearing impact than the existing building. It should be noted, however, that whilst the existing building to be demolished is smaller at for storeys (as it is a similar maisonette block), it is also set approximately 5m closer; or, to put it another way, the proposed building would be set back further away by 5m.
- 6.4.10 Furthermore, the applicant's Environmental Statement indicates that all of the windows assessed for both daylight and sunlight amenity of 47-61 Alma Road are compliant with the guidelines given in the BRE Report, and therefore concludes that the effect of the proposed development on daylight and sunlight amenity is considered to be not significant.
- 6.4.11 Given the above, therefore, in terms of the overbearing and overshadowing impact, it is considered that whilst there may be some additional effects, these would be modest and would not result in a significant loss of amenity to the existing residents of 47-61 Alma Road.
- 6.4.12 In terms of overlooking, the northern elevation of the proposed building would also be a primary frontage with a mixture of habitable rooms and balconies. However, this would in essence be a front-to-front relationship not dissimilar to the existing one. Ultimately, as the new building would be 30m from the existing building, the proposed development would comply with Policy DMD10 of the Development Management Document. As such, the application is again considered acceptable in this respect.

Impact upon 10-16 Alma Road and 7 Anglers Terrace (Napier Road)

- 6.4.13 Concern was raised at pre-application stage with regards to the height of the new building (mix six and five storey block) to front onto Alma Road would potentially have insofar as creating an adverse impact on the existing residential occupiers of 10-16 Alma Road and 7 Anglers Terrace. 10-16 Alma Road are two storeys high and located just 5m from Alma Road at their closest point; based on the plans submitted the proposed building would be approximately 20.3m from 10-16 Alma Road at its closest point. The relationship to 7 Anglers Terrace is slightly different, with this property facing south onto Napier Road, but its proximity to the application site raised concerns nonetheless, with the distance here being approximately 23.0m.

Given the height of the proposed building (greater than three storeys) Policy DMD10 of the Development Management Document requires that there should be a 30m separation which clearly would not be the case here. As such, the onus is on the applicant to demonstrate what impact would occur in terms of the daylight and sunlight from the proposed building to the existing buildings.

- 6.4.14 The primary concern raised at pre-application stage related to the difference in height of the proposed building and the potential for it create an adverse impact by way of overshadowing and overlooking. In relation to overshadowing, whilst it is accepted that the existing residential properties front onto Alma Road, the new build would have the potential to cause a significant overshadowing of the front facing habitable room windows (although it is accepted that in relation to loss of sunlight this impact would be most pronounced in the morning only because of the orientation of the buildings); similarly, the impact on the rear elevation of 7 Anglers Terrace. Concern was also raised in relation to an adverse overlooking relationship created to the rear gardens, and, to slightly lesser extent because of the oblique angle, to the rear windows of this property.
- 6.4.15 In order to reduce the impact of the development on these properties the applicant has introduced a setback of the top floor of the northernmost building (block 5) on the west elevation. This reduces the height of this part of the building from five to four storeys. Whilst the extent of this setback is limited, it is considered to have a beneficial effect as when viewed from street level it would reduce the visual impact and dominance of the building.
- 6.4.16 In relation to 10-16 Alma Road, the applicant's Environmental Statement has assessed the impact of the proposed development upon the windows of these properties, although it is noted that this assessment forms part of the completed development including buildings that are proposed under the outline planning application. The applicant's assessment as set out in the Environmental Statement is as follows:
- These four terraced houses [10-16 Alma Road] are located to the west of Phase 1A and the windows facing towards the proposed development have been assessed. Of the 15 windows assessed, 13 (87%) fully comply with the BRE Report recommendations for daylight amenity. The two windows which transgress the guidance are ground floor window W1 and first floor window W1 on 10 Alma Road. These windows retain 0.74 and 0.67 times the VSC values in the existing conditions compared to the 0.80 recommendation. The effect of the proposed development on daylight amenity is considered to be minor adverse.
 - In terms of sunlight amenity, 13 (87%) of the windows assessed comply with the BRE Report guidelines for sunlight amenity. First floor windows W1 and W2 on 10 Alma Road transgresses the BRE Report guidelines, W1 retains 20% APSH including 3% during the winter months and W2 retains 29% APSH including 3% during the winter months, compared to the 25% APSH, including 5% during the winter, recommended by the BRE Report guidelines. The effect of the proposed development on sunlight amenity is considered to be minor adverse.
- 6.4.17 In relation to No.1 to 7 Anglers Terrace, albeit again noting that this analysis is impact by the inclusion of the impact of a later phase of the development

which does not form part of this application, the applicant's assessment in the Environmental Statement is as follows:

- These properties are located to the north of Phase 2A and to the west of Phase 1A and the windows on the southern and eastern elevations which face the proposed development have been assessed. Floor plans for this property have been acquired from LBE's online planning database.
- Of the 40 windows assessed, 38 (95%) fully comply with the BRE Report recommendation for VSC. The two windows which transgress are secondary windows located on the eastern elevation serving a multi-aspect lounge. The main windows for this lounge are fully compliant with BRE Report guidance. The daylight distribution results show that of the 30 rooms assessed, 11 will comply with the BRE guidelines. All of the living/kitchen/dining rooms will retain access to direct skylight to at least 60% of the floor area. Bedrooms are considered "less important" in the BRE guidelines. The effect of the proposed development on daylight amenity is considered to be minor adverse.
- The sunlight results show that 32 (94%) of the 34 windows tested will fully comply with the BRE Report guidelines. The 2 windows which transgress the guidance are secondary windows located on the eastern elevation serving a multi-aspect lounge. The main windows for this lounge face north and do not require testing for sunlight amenity. The effect of the proposed development on sunlight amenity is considered to be minor adverse.

6.4.18 Notwithstanding the setback introduced therefore, it is evident from the applicant analysis that there would be an impact in terms of some loss of amenity from the proposed development upon the occupiers of these buildings, 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."

6.4.19 It is clear therefore, that the proposed development would have some limited impact on the amenities of the occupiers of these properties, and that the relationship between the existing and proposed buildings would not comply with Policy DMD10 of the Development Management Document. Whilst this impact is not judged to be significant, it would occur nonetheless. 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 moderate impact on the amenities of the occupiers of these properties is judged to be acceptable in this instance.

Impact upon Silver Birch Court

6.4.20 This existing residential building is located on the corner of South Street and Woodall Road, and is located to the south of the application site. Given the modest difference in terms of the location of the 16 storey high building and Kestrel House, and of course the reduction in height of seven storeys, it is

considered that the proposed development would have no discernible impact upon the amenities of the occupiers of this building. Whilst the new building would include a seven storey high element that would be to the west of the higher 16 storey element, this would again of course be located due north of Silver Birch Court at a distance of approximately 32m. Accordingly, it is considered that the relationship between the proposed development and the existing building, would comply with Policy DMD10 of the Development Management Document, is acceptable.

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.

Transport Assessment

6.5.5 A detailed Transport Assessment has been submitted with the application that has been subject to extensive discussion. This process has demonstrated that Phase 1a is generally acceptable in transport terms, particularly in view of the relatively minor increase in traffic generation. The following table indicates the net increase in traffic generation:

Time Period	Vehicle Trip In	Vehicle Trip Out	Total Daily
Morning Peak Hour	3	11	14
Evening Peak Hour	6	4	10
Total Daily	60	62	122

6.5.6 However, there remain a number of issues that need to be addressed by way of conditions and Section 106 Agreement obligations.

Vehicular access

6.5.7 The submitted plans indicate that one of the existing two access points, located to the south of Alma Road, will become redundant and would need to be closed up and converted back into footway whilst a new access point is proposed to the south of the mini roundabout of Alma Road with Napier Road, located in the close vicinity of the existing road island. These arrangements are generally acceptable, although the detailed designs will need to be reviewed on completion of the required safety audit and an appropriate condition (details of access) should therefore be attached. This condition, should also ensure that a) the 2.0m x 2.0m vehicle-to-pedestrian visibility splays either side of the access are secured; and b) that the proposed gates are removed or relocated to ensure that vehicles do not block back and interfere with either vehicles or pedestrians on Alma Road.

Traffic calming in Alma Road

6.5.8 Traffic calming in Alma Road is necessary to enhance highway safety, particularly in the vicinity of the primary school. The existing scheme has been effective in improving road safety and a similar level of traffic calming needs to be maintained in the future. It is noted that Alma Road is a bus route and roads humps etc., which would minimise the loss of on-street parking, are problematic. A solution based on horizontal deflection will therefore need to be developed and the details and timescales for the delivery of these works should be secured via a planning condition and within Section 278 Agreement.

Station Square pick up/drop off arrangements

6.5.9 The current free parking bays at the Station will be removed and a new pick up/drop off facility in form of four bays is being provided. Any parking demand (of more than 10 minutes) is proposed to be assimilated within the Falcon Road spur car park, located circa 200m from the station. The details of the parking management strategy, likely number of users expected, measures to prevent overspill onto adjacent roads, including provision of new signage/information in the Station Square, etc, should be secured under a Parking Management Plan for the proposed development and legal agreement(s).

6.5.10 A new pedestrian link is proposed between the Station and the Falcon Road spur car park. The details of the link should be secured by a planning

condition; the improvements to crossing facilities should be secured as part of Section 278 Agreement works.

- 6.5.11 The existing two disabled parking bays are proposed to be re-provided close to the Station on Alma Road. The provision should be secured under a Section 106 contribution towards changes in parking controls. In addition there are some concerns about the design of the new drop off/pick up facility. However, these can be addressed as part of the detailed design process that will be carried out pursuant to the necessary highway agreement.

Cycle parking facilities

- 6.5.12 The current design was developed to meet cycle parking standards set out in the previous London Plan 2011 (Revised Early Minor Alterations to the London Plan, October 2013), which required the provision of 223-250 residential cycle parking places.
- 6.5.13 The submitted plans meet the standard if measured across the site, but not if calculated on a block by block basis, when 250 spaces would be required. However, the applicant has confirmed that they will aim to increase the level of cycle parking to approach the 364 needed to comply with the latest (2015) London Plan standards. A condition is therefore proposed to enable the cycle parking arrangements to be reviewed and enhanced.
- 6.5.14 In some cases double stack racks are proposed. These can be particularly difficult to operate by younger users and will also require regular maintenance. A maintenance strategy together with allocation plan which gives priority to children over adults in using the lower racks, together with the details of racks, should therefore be secured by an adequately worded planning condition.
- 6.5.15 The same London Plan 2011 criteria require the following provision for non-residential uses:
- Café/restaurant- 1 per 20 staff and 1 per 20 customers;
 - Gym: 1 per 10 staff and 1 per 10 visitors.
- 6.5.16 The long term cycle parking for staff to the gym and café has not been provided as part of the scheme but will be required. Six covered and secured spaces should be provided. As there is space within the site to provide the stands, the details of location and design of the stores should be secured by a planning condition.
- 6.5.17 Eight external/short-term cycle stands are shown to the south of the entrance to the train station which is assumed will be for visitors. Whilst the form of parking (Sheffield stands) is acceptable the stands should be located closer to the units they intend to serve in a location where they do not conflict with servicing movements. As there appears to be sufficient space in Station Square to provide suitable cycle parking facilities for visitors to café and gym and this matter can be dealt with by planning condition and Section 278 works.

Cyclists

6.5.18 The site is close to but not well connected to cycle facilities on the A1055 and the proposed Cycle Enfield route planned for the A1010. It is essential that opportunities for cycling are maximised to limit the level of traffic generation and a s106 contribution towards cycling under Section 106 Agreement will therefore be required to go towards:

- Cycle training for residents to increase confidence in using this mode of travel;
- Provision of a dedicated cycle lane along the northern side of South Street or identification of an approx. 3m wide alignment that can facilitate use by cyclists who are unwilling/unable to use South Street, especially if the street is congested;
- Cycle markings in Alma Road, South Street, Woodall Road, Scotland Green Road, Napier Road and Curzon Avenue;
- Cyclists safety improvements at the junction of Alma Road / Napier Road, Woodall Road / South Street / Alma Road, Scotland Green Road / South Street.

Pedestrian Access

6.5.19 Most of the footways within the site meet the standards set out within the Department for Transport Manual for Streets (MfS) document. Improvements to the footways along the site frontage in Alma Road should be secured under Section 278 Agreement and a planning condition.

6.5.20 The proposed development will increase footfall on the existing footways in the area. To assess the impact and identify any improvements needed to the local pedestrian environment the applicant carried out the audit of local footways between the site and local amenities. This highlights the need to improve pedestrian facilities in the vicinity of the application site and an obligation to secure the following improvements should be secured for:

- Improvements to pedestrian crossing at the junction of South Street/Scotland Green Road (pedestrian and cyclist improvements in support of the anticipated linkage between the station, 'boulevard' and Scotland Green Road, Alma Road/South Street/Station Square/Woodall Road with potential of introducing pedestrian island in Woodall Road and junction of Napier Road with Alma Road, footway resurfacing.
- Wayfinding signage;

Buses

6.5.21 The traffic generation assessment reveals that circa 49% (172) of all residential daily trips will be undertaken by public transport. It is therefore important that the surrounding bus stops are compliant with the TfL accessibility standards (TfL 'Accessible Bus Stop Design Guidance, 2006') and facilities are in place to assist pedestrians to walk to the nearby public transport hubs, including the Ponders End Train Station.

Car Parking

6.5.22 Parking is proposed in courtyards accessed via Alma Road between the two new blocks, connecting with the junction of Alma Road and Napier Road. In total 105 spaces are proposed for the 228 units, of which 15 spaces will be on street and 90 located within the site. This is equivalent to 0.46 parking ratio

and falls short of the agreed 0.6 ratio. As the proposed development will be developed first in 2018, an additional 33 spaces should be secured for residents of the development. The temporary location for the 33 spaces to meet the 0.6 ratio for Phase 1A is presented in Figure 3.10 of the TA and is acceptable.

- 6.5.23 The London Plan 2015 doesn't contain standards for A3 and D2 uses and no dedicated car parking is shown for the café and the gym. Falcon Road car park may provide some capacity at times but the uses may add pressure for on-street space. The design of any future controlled parking zone (or other parking controls) will therefore need to investigate the opportunity for short-stay on-street parking.

Car Club

- 6.5.24 The nearest car club bay is located outside the walking distance from the site in Cornwallis Road (Edmonton). The wording of the Section 106 Agreement should therefore ensure that on occupation of Phase 1a, at least one car club bay is provided on street, together with a five year free membership and a £25 driving credit per household. On street bay will require the developer to cover the costs creation of a bay within public highway (a cost of £2,500 per one bay). A contribution should be secured under a Section 106 Agreement.

Electric charging points

- 6.5.25 20% of all parking spaces should be equipped with electric vehicle charging points (EVCP) along with a further 20% passive provision. Whilst provision off street will be secured by a condition, a financial contribution will be sought under s106 for provision of electric charging points on street and their maintenance.

Disabled parking

- 6.5.26 The proposed site layout plan shows the majority of disabled bays located in a single area, along the access way into the site and some in the rear parking courts. The bays do not seem to be distributed evenly across the blocks and provided as close to the entrance into the buildings as possible. However, a flexible approach to provision of disabled spaces from the outset is acceptable. Adequate provision of disabled parking for the proposed development can therefore be secured by adoption of a Parking Management Plan to monitor take up, liaising with the TPC for the Travel Plan. The details should be secured by a condition, including the removal of on-street disabled bays.

Travel Plan

- 6.5.27 The development has the potential to generate a substantial number of vehicle movements. Accordingly, the following matters should be secured under a Section 106 Agreement:

- Costs of establishing of a local Controlled Parking Zone;
- The developer should appoint a Residential Travel Plan coordinator (RTPC) upon completion of phase 1a (circa 2018);
- Comprehensive and TRICS (TRAVL)-compliant surveys should be conducted within six months of occupation on site;

- Mode share target: single occupancy vehicle use (20%), car share (10%), walking (30%), cycling (10%), bus and train mode (30%);
- A minimum of one car club bay available to the public at large and costs of at least five year membership for residents;
- Incentives to promote public transport and/or cycling

Delivery and Servicing Plan

6.5.28 Although a Framework Plan has been submitted a full Plan should be secured under Section 106 Agreement. This should take into account the requirements and opportunities for service and deliveries to the station and non-residential uses on Station Square. The Plan should be managed in conjunction with the Parking Management Plan and Travel Plan.

Construction and Logistics Plan

6.5.29 To comply with Policy 48 of the Development Management Document, the application attempts to provide details on the temporary construction issues. The submitted framework *Construction and Logistics Plan* (CLP) does not however fully comply with the Enfield's standards. A full Construction Traffic Management Plan should therefore be secured by a planning condition.

Stopping up order

6.5.30 The development will require the 'stopping up' of parts of the adopted highway in order to deliver the scheme. Whilst this is acceptable in principle, the recommendation should specifically acknowledge the need for a stopping up order to provide officers with the necessary authority to commence the process.

Refuse and servicing access

6.5.31 Residential refuse for the majority of blocks will take place from the kerbside in Alma Road. Refuse and recyclables for the southernmost block 1 however will require access for a refuse vehicle via the proposed station square pick up/drop off area. Parking controls would need to be secured and introduced in this area to ensure that the access is kept clear during collection and also delivery times associated with the café and gym. A masterplan for the area showing the proposed waiting and parking controls should be secured by a planning condition whereas contribution to deliver it secured under a Section 106 Agreement.

6.5.32 There is no information provided on the loading provision for the café and gym. It is therefore assumed that they will require similar access arrangements via the pick-up/drop off bays as the Rail Station.

6.5.33 It is unclear whether Network Rail and Abellio Greater Anglia's station and track access requirements have been considered at this stage. However, this can be addressed as part of the detailed design of Station Square.

6.6 Sustainable Design and Construction

Energy

- 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 – i.e. an Energy Centre – is provided on the site as part of the overall regeneration of the estate.
- 6.6.3 The delivery of the infrastructure to facilitate the Lee Valley Heat Network is set out in detail in the accompanying report for the assessment of the outline planning application. The scale of the development proposed by this detailed application is not conducive for the delivery of the same level of infrastructure.
- 6.6.4 The applicant's Energy Strategy for this application sets out that as the site-wide energy centre will not become operational until 12 to 18 months after the construction of this development, the combined carbon saving for Phase 1A will be 7.1% over Part L 2013 (a 1.4% saving through the implementation of demand reduction measures and a 5.7% saving through the specification of photovoltaics (PV)). Approximately 532 m² of active PV area are proposed to be installed as part of this development, which equates to approximately 48 kWp and 28% of the available roof space in this phase (including space for maintenance and access etc.). The Energy Strategy then goes on to states that:
- “Following connection to the site-wide CHP-led district heating scheme, Phase 1A will aim to achieve the 35% saving in line with the site-wide approach. Given that photovoltaics will only occupy approximately 28% of the available roof space in Phase 1A, there is scope to increase the PV contribution to meet the 35% target, if required after connection to the energy centre.”*
- 6.6.5 It is therefore apparent that the Energy Strategy for this application would not be in accordance with London Plan Policy 5.2 and DMD51 of the Development Management Document as target to reduce carbon dioxide emission by 35% over Part L of Building Regulations 2013 would not be achieved on its own. The applicant's approach is predicated on linking this Energy Strategy to that of the outline planning application for the regeneration of the entire development.
- 6.6.6 It is noted that neither the Council's Sustainable Design Officer nor the GLA have objected to the application on this basis accepting that in order to achieve the carbon dioxide reductions the benefits of the site-wide district

heating network must be engaged. Comments have been made in relation to the collection of the sites energy centre into the wider Lee Valley Heat Network which are not directly relevant to this development but are instead considered under the outline planning application.

Sustainability

6.6.7 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.

6.6.8 In this regard, all developments are be required to submit a full and detailed pre-assessment report at planning application stage (RIBA Stages C & D) as well as formal certification of credentials under the Code for Sustainable Homes secured by way of a condition in the following formats and at the following times:

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

6.6.9 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."

- 6.6.10 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

- 6.6.11 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.
- 6.6.12 The applicant proposes 1,156m² of biodiverse green roofs as part of this application. The Council's Sustainable Design Officer is concerned that the amount proposed 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 2 – and the biodiversity strategy which prioritise green spaces and roofs over walls.
- 6.6.13 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.
- 6.6.14 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.

Water

- 6.6.15 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.
- 6.6.16 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.

- 6.6.17 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.

Other sustainable design matters

- 6.6.18 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.

- 6.6.19 On the basis of the above the, 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 Urban 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 in turn set out 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 the applicant has submitted two Sustainable Drainage concepts for this detailed planning application.

6.7.10 The first option did not include permeable paving, and concern was also raised that the proposed tree pits design would not cope with all the highway runoff. Accordingly, the Council's SuDS Officer has objected to this option and advised that it is not acceptable to them.

6.7.11 Option 2 proposes to maximise full infiltration of surface water drainage, with an overflow mechanism to the existing Thames Water Sewer restricted at 5 L/s. The Council's SuDS Officer has advised that Option 2 is acceptable as the scheme would maximise infiltration and propose to use above ground source control and infiltration SuDS. The Council's SuDS Officer has advised, however, that there are some issues with Option 2 which need to be resolved, which include:

- Agreeing an adequate strategy for silt management - evidence on how silt will be managed at the surface;
- Discussing the use of French Drains and Slot Drains (which have implications on silt management and overall maintenance strategy);
- Confirmation on the specification of materials such as type of permeable paving;
- Details of cross-sections and long-sections of proposed tree-pits, rain gardens, permeable paving showing their connectivity;
- Management plans;
- Overland flow routes for exceedance;

6.7.12 Accordingly, it is considered that the proposed Sustainable Drainage Plan as set out in Option 2 submitted by the applicant is acceptable, subject to a number of pre-commencement conditions to address the above concerns.

Air Quality

6.7.13 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.

6.7.14 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).

6.7.15 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.

6.7.16 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.

Contaminated Land

6.7.17 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.

6.7.18 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 the historical and that given 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.

6.7.19 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.

Noise and Vibration

6.7.20 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.

6.7.21 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.

6.7.22 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.

6.7.23 The applicant concludes that the noise and vibration effects of the proposed development will be not significant, with the exception of 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.

6.7.24 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.

6.7.25 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

6.7.26 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.

6.7.27 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).

6.7.28 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.

6.7.29 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.

6.7.30 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.

Archaeology

6.7.31 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.

6.7.32 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.

6.7.33 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.

6.7.34 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.”

6.7.35 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.

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
- Business and Employment Initiative Contribution
- Childcare Contribution
- 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
- Highways – various such as Travel Plan, Car Club etc

- 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

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, the Council's Traffic and Transportation department has 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. 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, accordingly 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 m².

6.8.9 Based on the net new floorspace for the residential element of the development which is 5,484 m², the scheme is liable for a payment of £125,418 for the Mayor's CIL (based on the current indexation figure of 255)

6.8.10 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.

Human Rights Act

- 6.9.4 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).
- 6.9.5 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

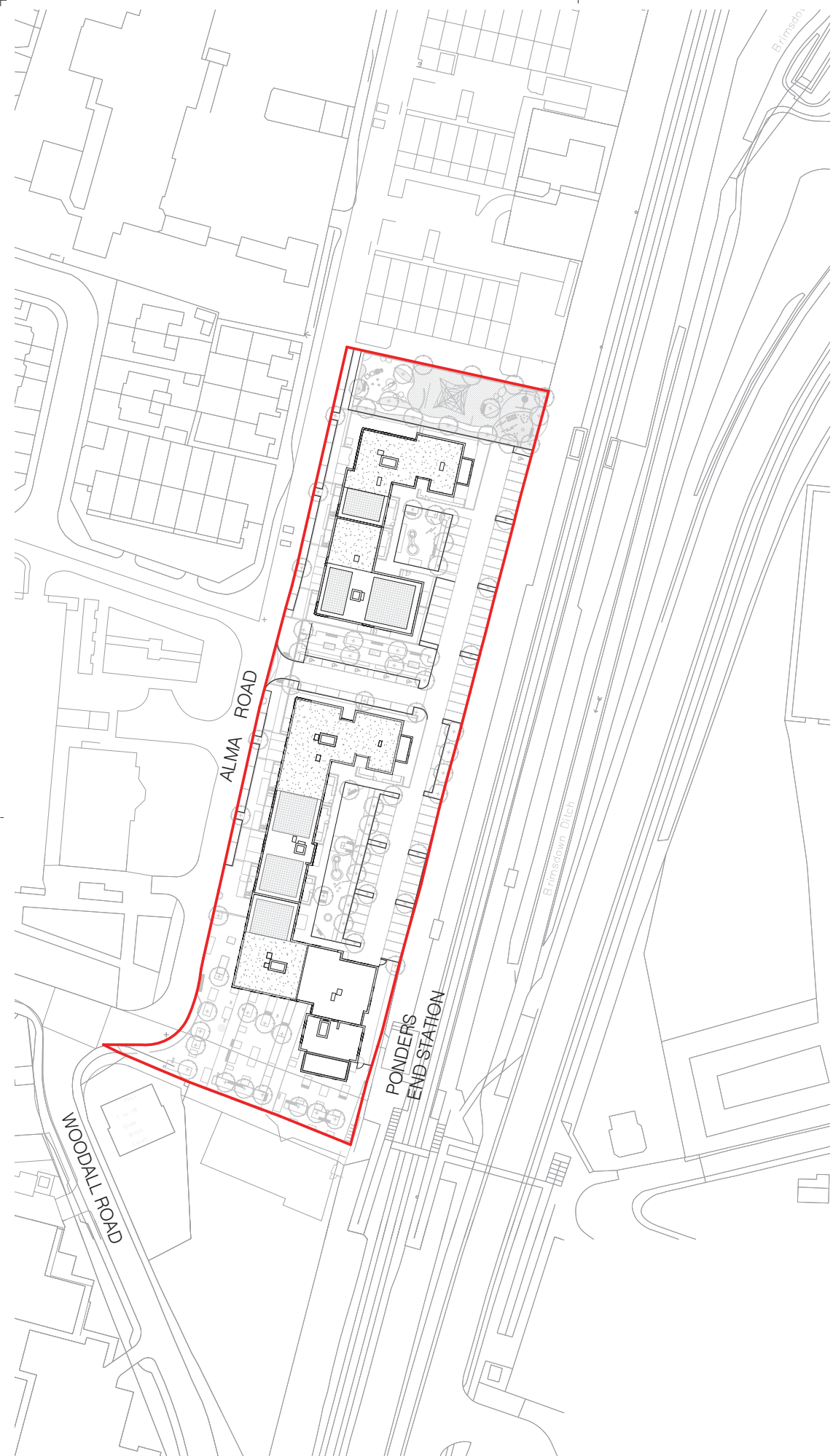
- 7.1 The Alma Estate is a strategically important site for the Borough and its surroundings. This planning application forms what is intended to be the first phase of a estate-wide regeneration programme, which is considered under the accompanying outline planning application. As this is a detailed planning application, however, it must be considered on its own individual merits.
- 7.2 The development proposed would result in a loss of 128 existing 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. 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. Of the 228 new residential properties proposed, 133 of these would be affordable, in either the social rent or intermediate tenure; as such the application would result in an additional five affordable housing units within the site. Furthermore, the provision of affordable housing for this development on its own would be 58%, well in excess of the Council's policy target. The proposed development would also include open market housing. Accordingly, it is considered that the proposal would result in a better mix of housing across the site, as well as an increase in the number and quality of the affordable units.

- 7.3 The overall design of the proposed development 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. Of greatest issue, perhaps, would be the impacts on the amenities enjoyed by a number of existing residential properties that do not form part of either this application or the wider regeneration scheme as proposed by the outline planning application. As this report sets, the proposed development would result in some limited adverse impacts. These impacts, however, have not been judged to be significant and when balanced against the regeneration objectives of the proposed development are considered to be acceptable.
- 7.4 It is acknowledged that the development is unable to deliver a Policy compliant 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 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.
- 7.5 In conclusion therefore the development proposed is considered acceptable and is supported. However, following the resolution of the Planning Committee, the application must again be referred back to the Mayor, to allow him 14 days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application, and any connected application
- 7.6 As this is a particularly large and complex scheme, the wording of conditions has not yet been fixed although the issues to be addressed by condition and or legal agreement have been highlighted throughout this report and are summarised below. Members are being asked in considering the officer recommendation to grant planning permission, to also grant delegated powers to officers to agree the final wording for these conditions and mechanisms to secure the delivery of those aspects of the scheme that cannot be dealt with through condition.

8. Recommendation

- 8.1 That, subject to referral to the Great London Authority, and the completion of a 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.



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	May 2015	FINAL PLANNING ISSUE		LB

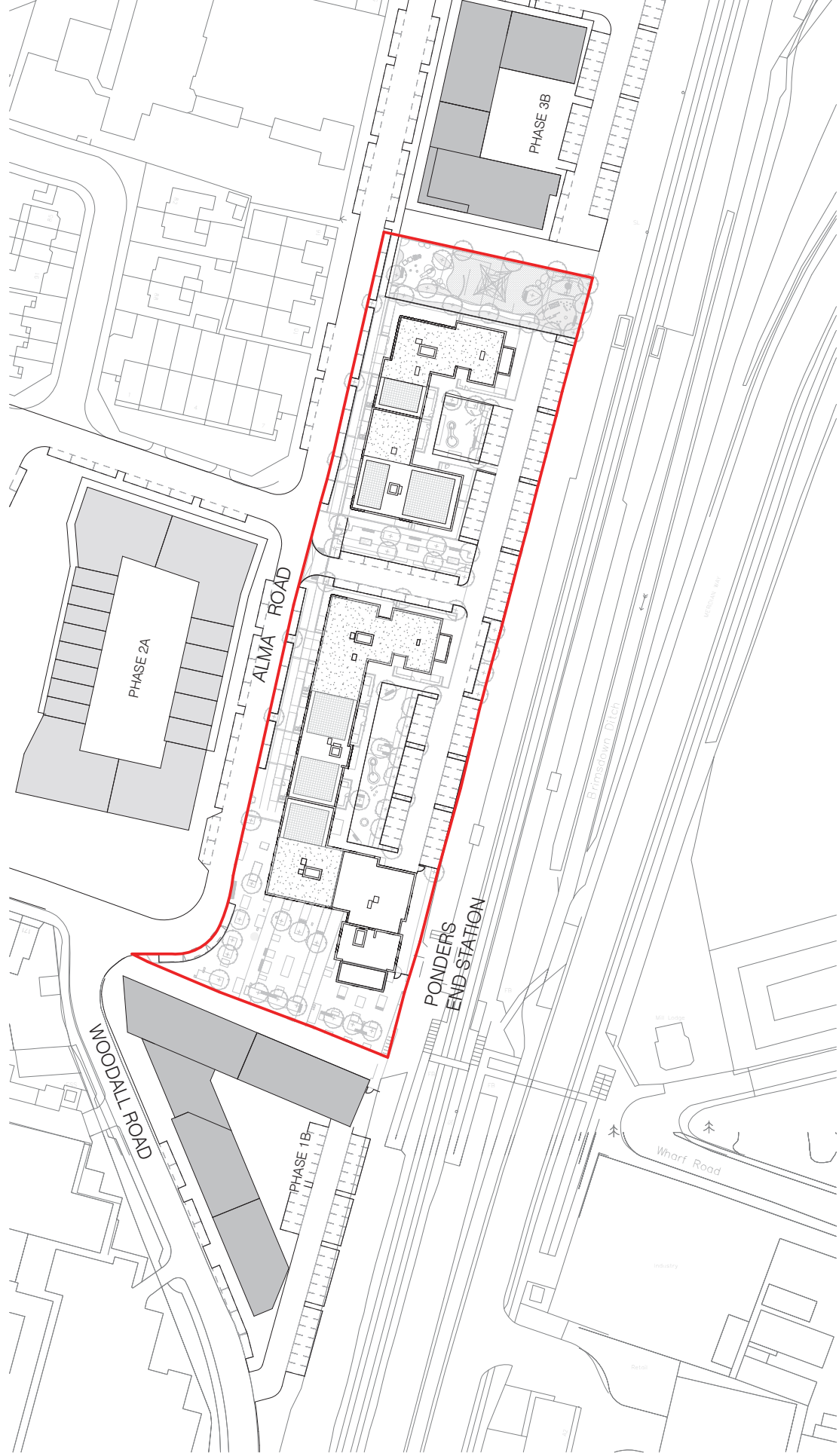
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PROJECT	PLAN NO	ISSUE	DATE
Alma Estate Regeneration	12_560	JV LB	1:500@A1 May 2015

Drawing: Block Plans in Existing Context
 File: 560_FUL_PL(00)010

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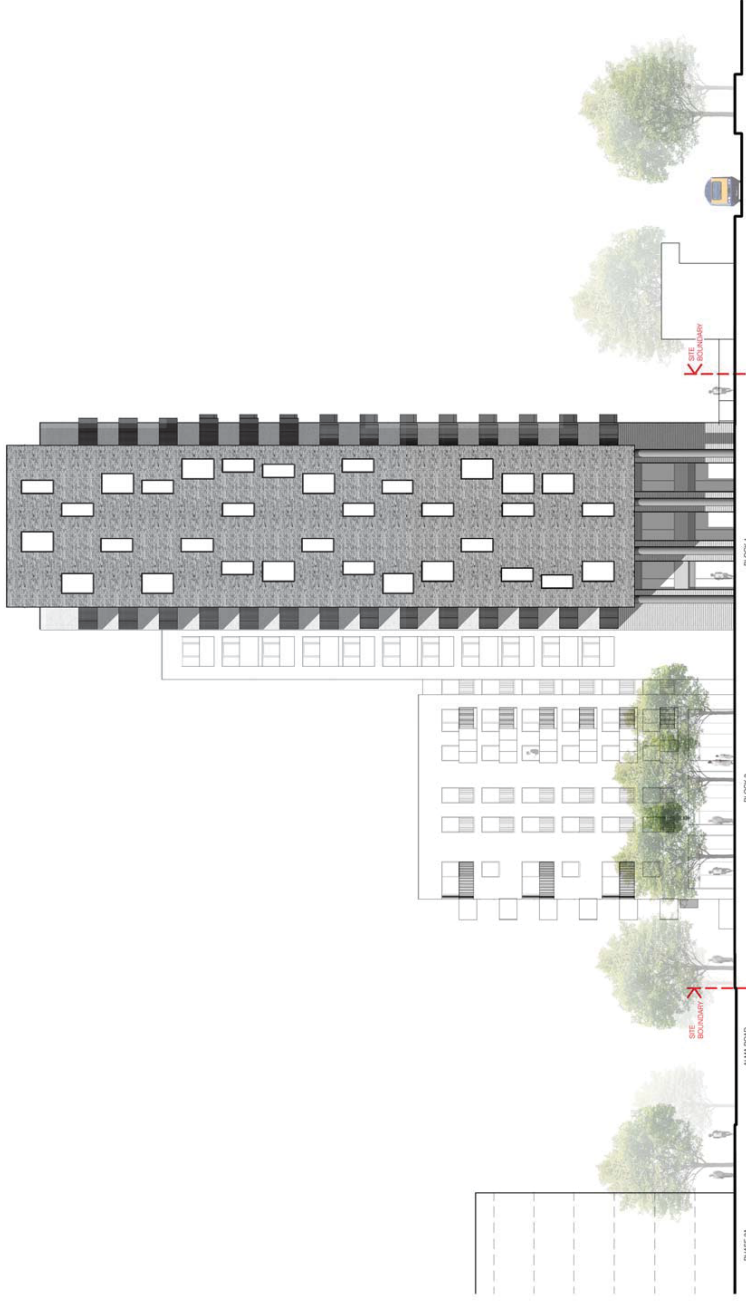


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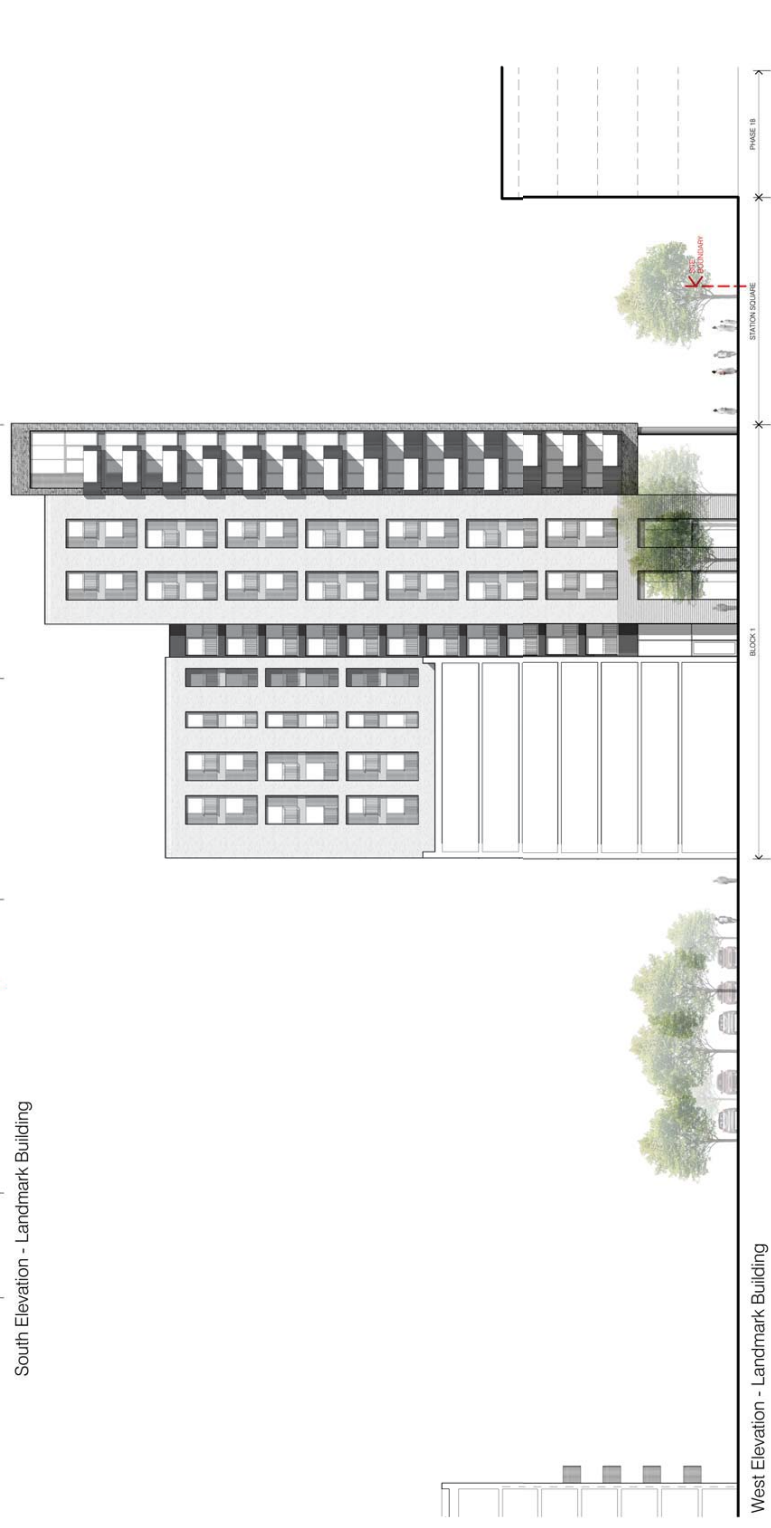


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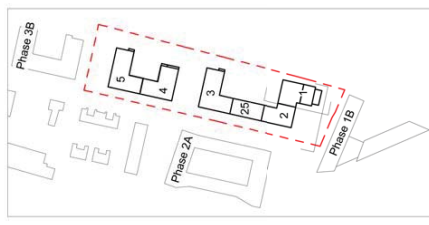
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South Elevation - Landmark Building



West Elevation - Landmark Building



May 2015 INITIAL PLANNING ISSUE
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 12 590 IT LB 1: 2006@1 May 2015
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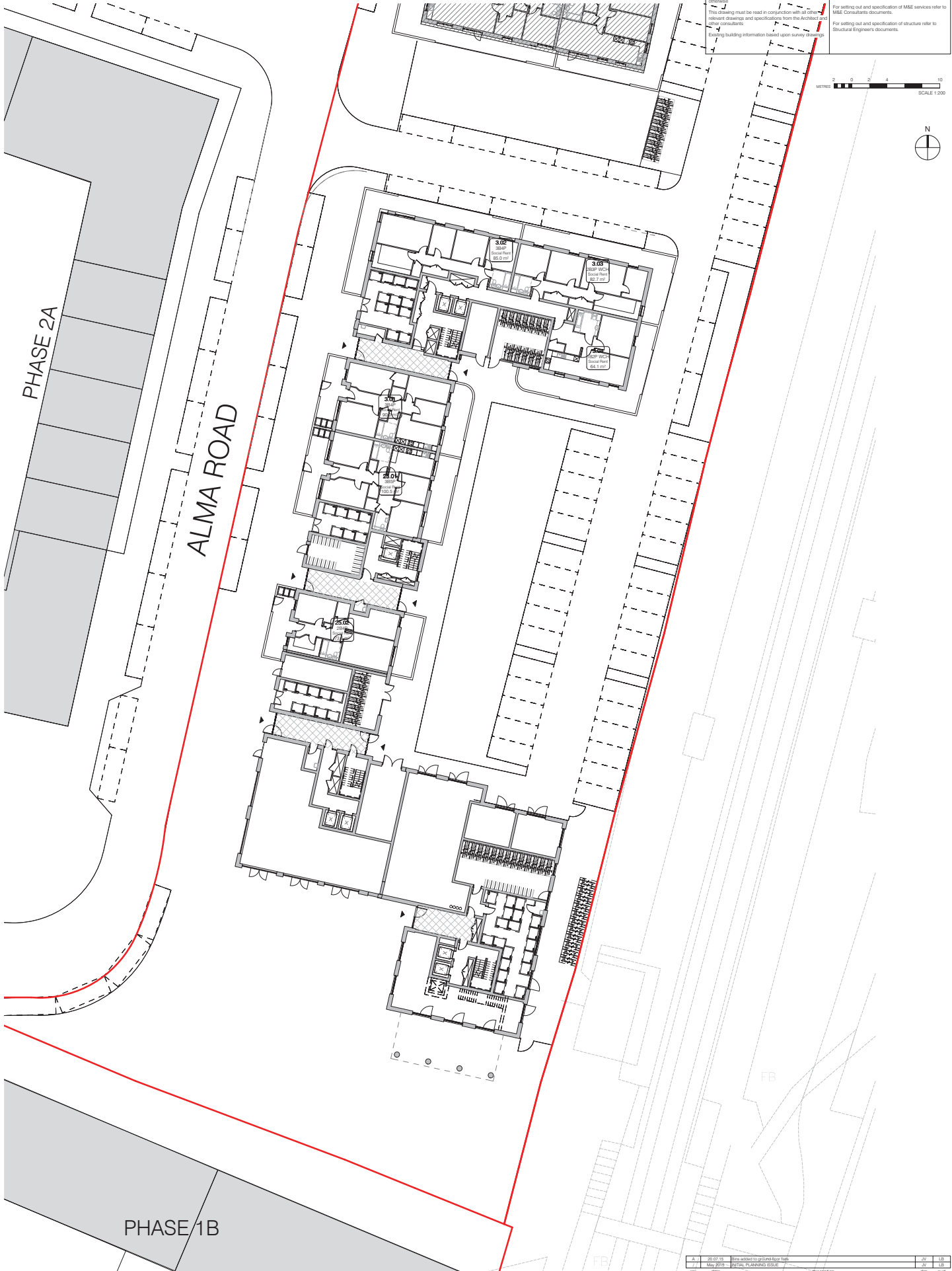
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Client: Alton State Regeneration
 Project: 12 590 IT LB 1: 2006@1 May 2015
 Drawing Number: 560_FUL_PL(00)200

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Project	Drawn	Checked	Scale	Date
Alma Estate Regeneration	12_560	JV	LB	1:200@A1 May 2015
Block	Blocks 1, 2, 25, 3 Ground Floor		560_FUL_PL(00)100	A

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3	2015.15	Amendments to ground floor plan	LS	LB
2	May 2015	RETAL PLANNING ISSUE	-20	LB
REV	DATE	DESCRIPTION	BY	AUTH

PLANNING

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project	12_560	drawn	checked	date
Alma Estate Regeneration	JV	LB	1:200@A1	May 2015
drawn	560_FUL_PL(00)117	rev		A

Blocks 4-5 Ground Floor Plan

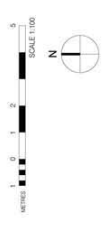
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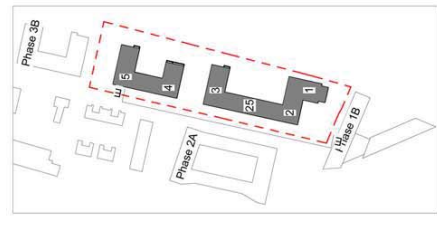
West Elevation - Blocks 1, 2, 25 & 3



West Elevation - Blocks 4&5



West Elevation - Phase 1A 1:500



1:1000 15 Approved Planning Application Form (Detailed Urban Design)
 7 May 2015 PTE Architects
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PLANNING

1:1000 15 Approved Planning Application Form (Detailed Urban Design)
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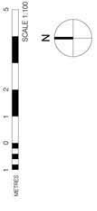
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**Pollard
 Thomas
 Edwards**

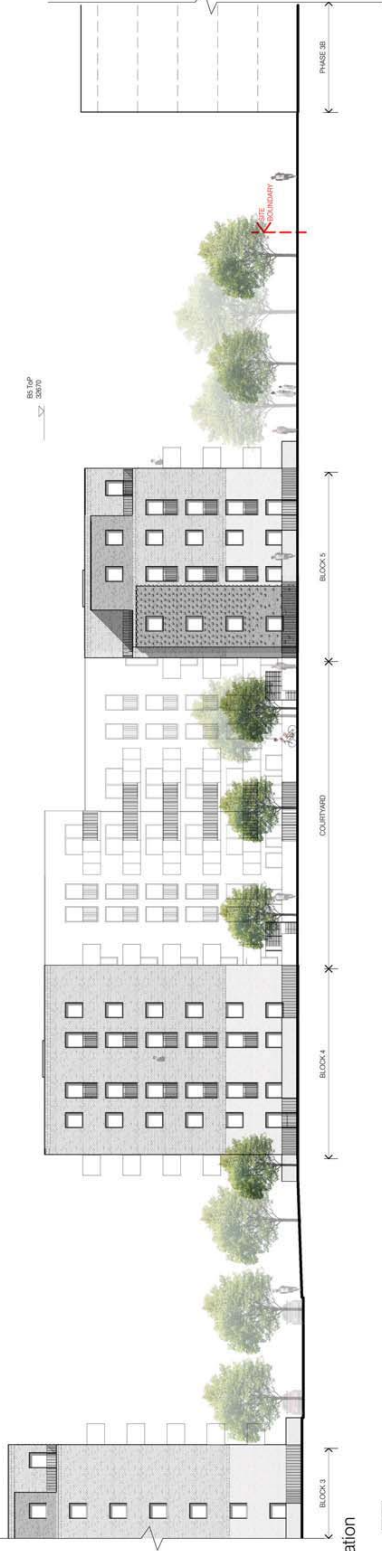
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 Architect and other consultants

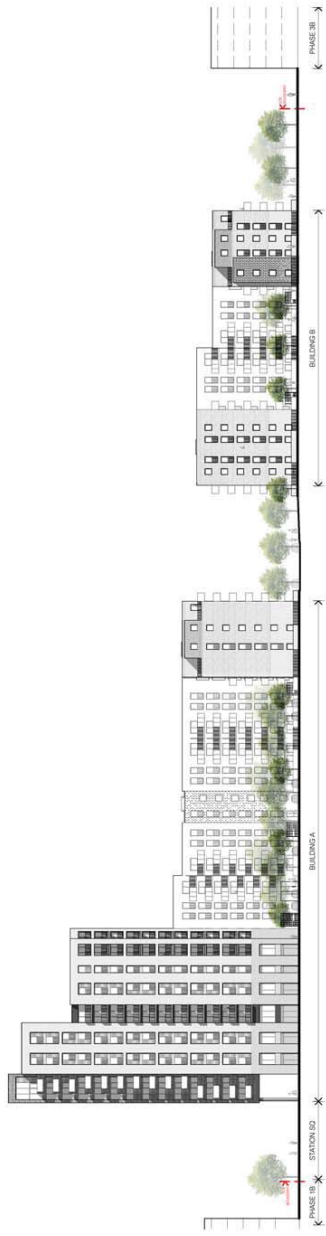
SETTING OUT NOTES
 All setting out to be confirmed on site prior to construction
 All setting out to be confirmed on site prior to construction
 All setting out to be confirmed on site prior to construction



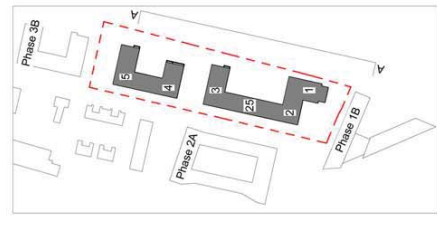
Blocks 1-4 - East Elevation



Blocks 4.5 - East Elevation



Phase 1A - East Elevation 1:500



1:100 1:500
 7 May 2015
 PTE ARCHITECTS
 28 OXFORD STREET
 LONDON W1D 1BS
 TEL: 020 7429 9000
 WWW.PTEARCHITECTS.CO.UK

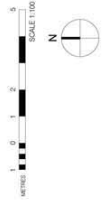
PLANNING

Project: Phase 1A
 Location: 28 Oxford Street
 London W1D 1BS
 Client: Pollard Thomas Edwards
 Date: 12 May 2015
 Drawing No: 560_FUL_PL000203
 Scale: 1:500
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 Drawing Title: PLANNING
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 Scale: 1:500
 Drawing Date: 12 May 2015
 Drawing Title: PLANNING

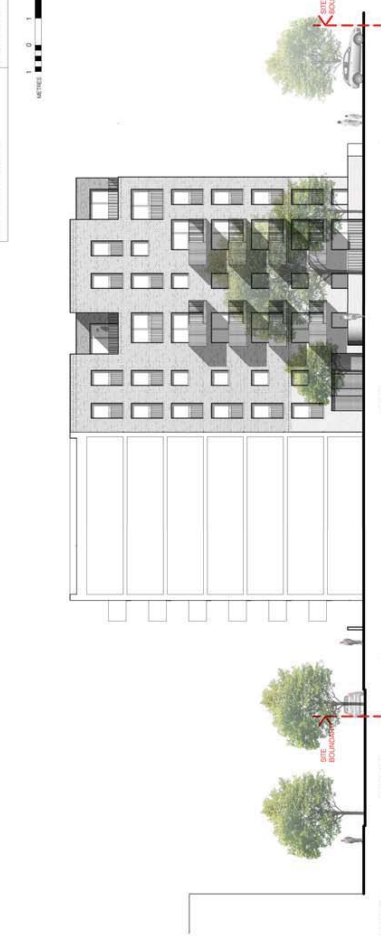
Pollard Thomas Edwards
 12, 560 IT LB As indicated/May 2015
 560_FUL_PL000203
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SETTING OUT NOTES
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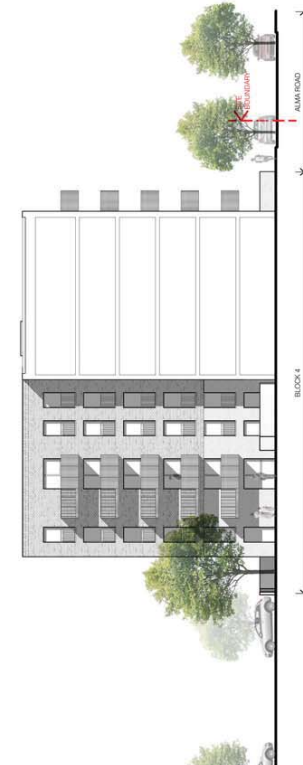
North Elevation - Block 3



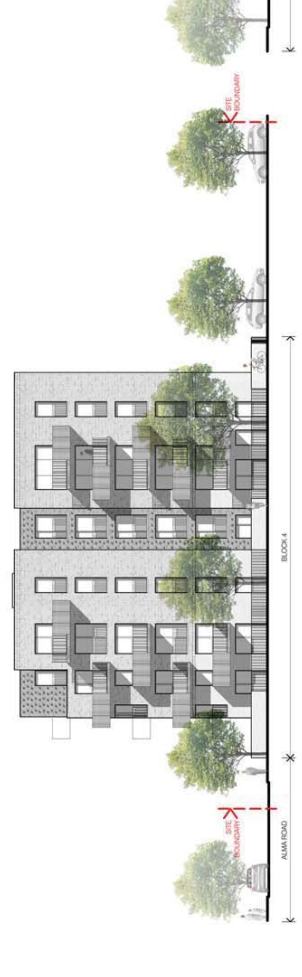
South Elevation - Block 3



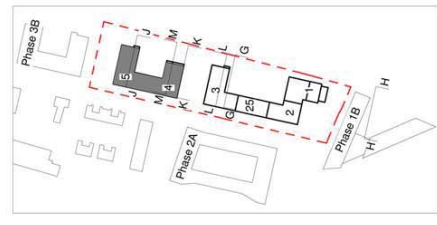
North Elevation - Block 5



North Elevation - Block 4



South Elevation - Block 4

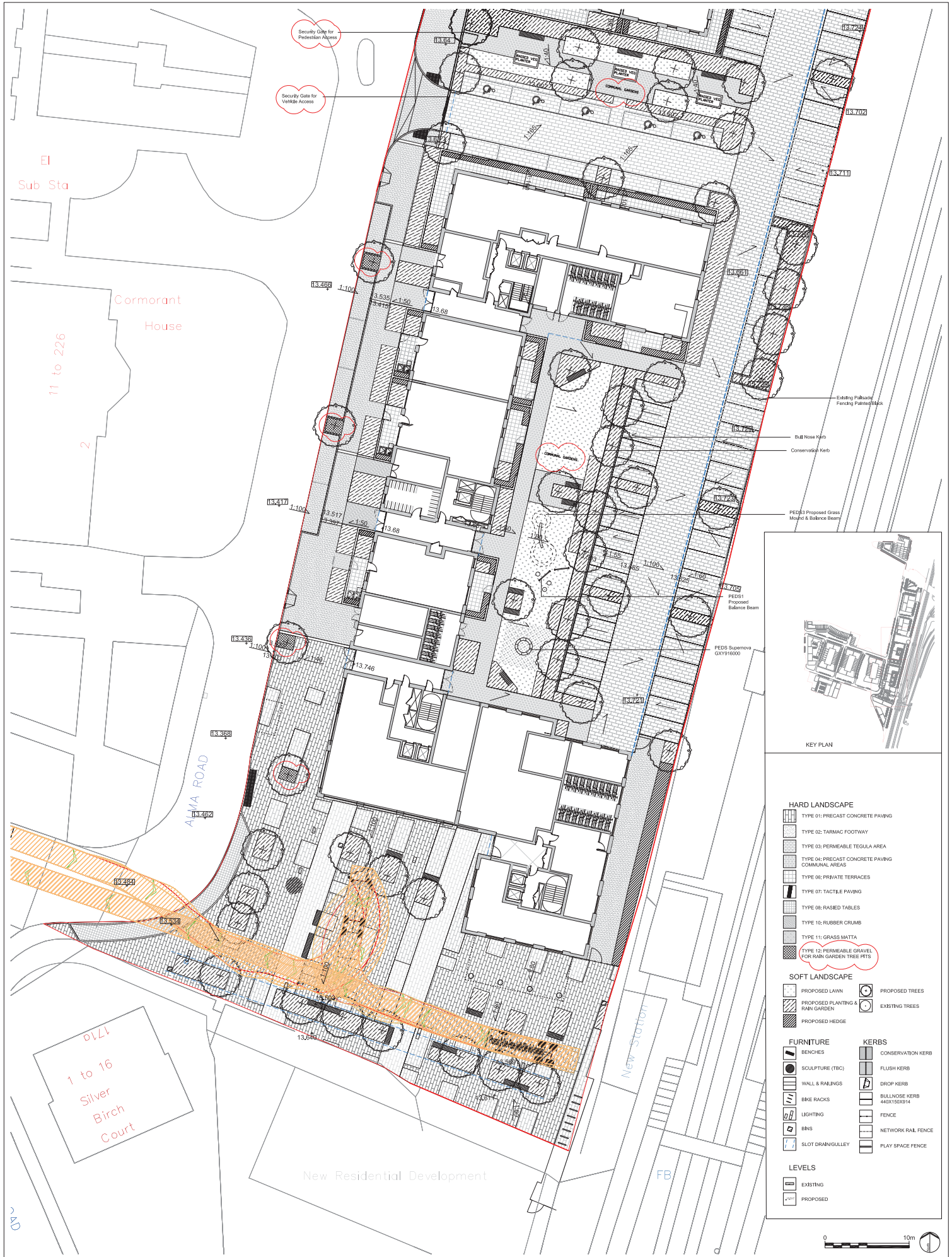


1:1000 Scale
 12_560 IT LB 1:2006(A) May 2015
 May 2015 PTE ARCHITECTS
 20 Graham Street
 London E1 6JQ
 Tel: 020 7706 1000
 Fax: 020 7706 1001
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 www.ptearchitects.co.uk

Project Name: Alway Estate Regeneration
 Drawing Number: 560_FULL_PL(00)204
 Drawing Date: A
 Drawing Scale: 1:2006(A) May 2015
 Drawing Title: 560_FULL_PL(00)204



HARD LANDSCAPE	
[Symbol]	TYPE 01: PRECAST CONCRETE PAVING
[Symbol]	TYPE 02: TARMAC FOOTWAY
[Symbol]	TYPE 03: PERMEABLE TEGULA AREA
[Symbol]	TYPE 04: PRECAST CONCRETE PAVING COMMUNAL AREAS
[Symbol]	TYPE 05: PRIVATE TERRACES
[Symbol]	TYPE 07: TACTILE PAVING
[Symbol]	TYPE 08: RASSED TABLES
[Symbol]	TYPE 10: RUBBER CRUMB
[Symbol]	TYPE 11: GRASS MATTA
[Symbol]	TYPE 12: PERMEABLE GRAVEL FOR RAIN GARDEN TREE PITS

SOFT LANDSCAPE	
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[Symbol]	PROPOSED PLANTING & RAIN GARDEN
[Symbol]	PROPOSED HEDGE
[Symbol]	PROPOSED TREES
[Symbol]	EXISTING TREES

FURNITURE	
[Symbol]	BENCHES
[Symbol]	SCULPTURE (TBC)
[Symbol]	WALL & RAILINGS
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[Symbol]	BINS
[Symbol]	SLOT DRAIN/GULLY

KERBS	
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[Symbol]	FLUSH KERB
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[Symbol]	BULLNOSE KERB 440X150X14
[Symbol]	FENCE
[Symbol]	NETWORK RAIL FENCE
[Symbol]	PLAY SPACE FENCE

LEVELS	
[Symbol]	EXISTING
[Symbol]	PROPOSED



EXTERIOR ARCHITECTURE
 LONDON: Studio 15, Hewlett House, Havelock Terrace, London, SW8 4AS
 MANCHESTER: Studio 537, The Royal Exchange, St Anns Square, Manchester, M2 7DH
 E-Mail: office@exteriorarchitecture.com
 Web: www.exteriorarchitecture.com

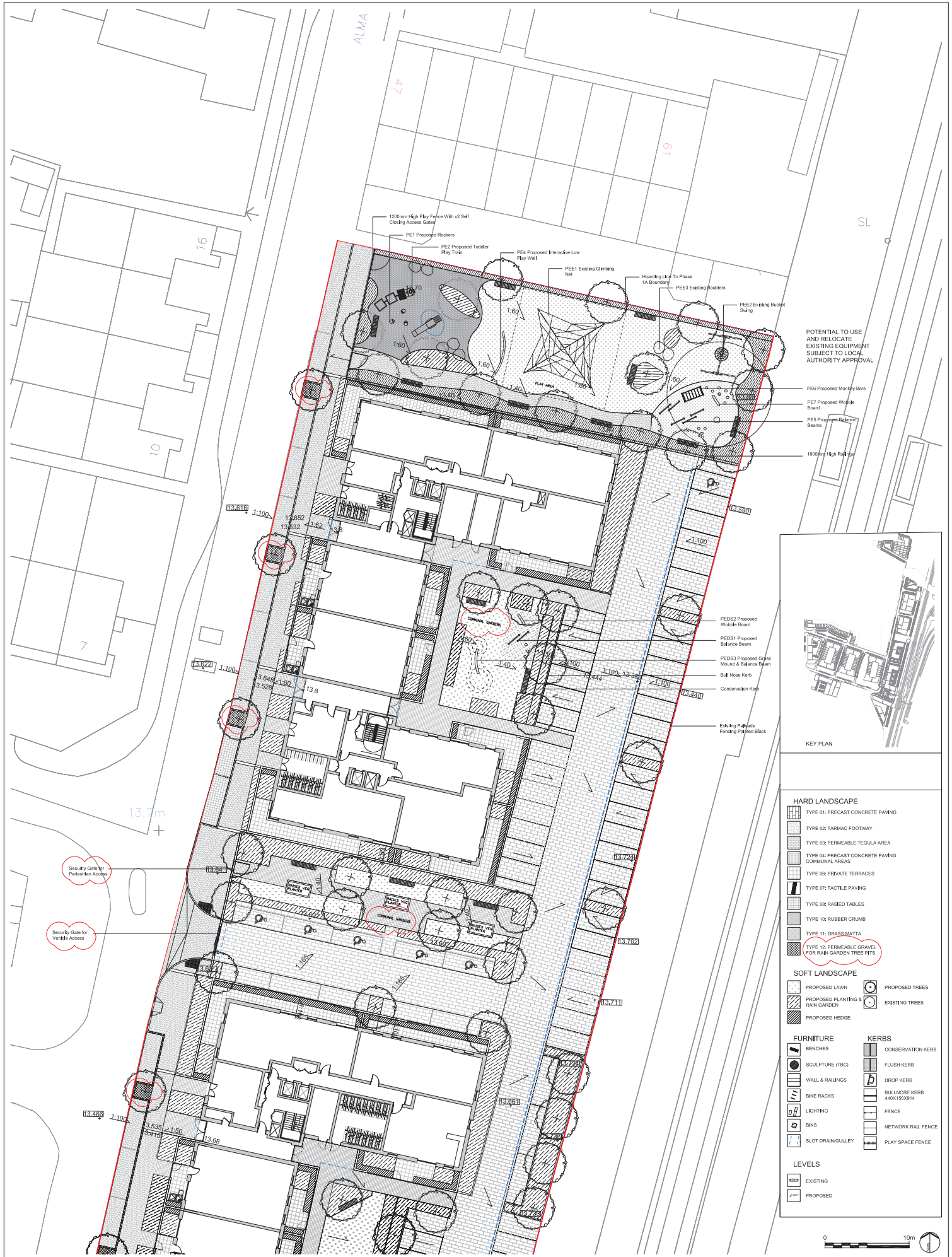
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Rev	Description	Date
A	SECURITY ACCESS AND SUDS	17.07.15

Project title
ALMA ESTATE
 Drawing title
LANDSCAPE GENERAL ARRANGEMENT DETAIL PLAN SHEET 1 OF 2

Issued By London
 Scale 1:200 @ A1
 Status PLANNING
 Date 06.05.2015
 Drawing number 1405_FUL_PL201
 Revision A
 T: 020 7978 2101
 Drawn EA
 Checked OC
 Approved LP

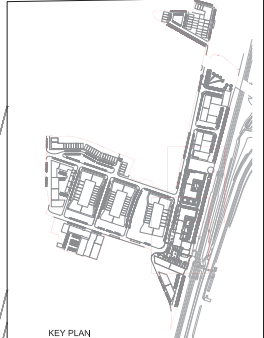
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POTENTIAL TO USE AND RELOCATE EXISTING EQUIPMENT SUBJECT TO LOCAL AUTHORITY APPROVAL

- PE1 Proposed Monkey Bars
- PE7 Proposed Wooden Board
- PE5 Proposed Balance Beams
- 1800mm High Railings

- PEDS2 Proposed Wooden Board
- PEDS1 Proposed Balance Beam
- PEDS3 Proposed Grass Mound & Balance Beam
- Bull Nose Kerb
- Conservation Kerb
- Existing Pathways Fencing Painted Black



HARD LANDSCAPE	
[Symbol]	TYPE 01: PRECAST CONCRETE PAVING
[Symbol]	TYPE 02: TARMAC FOOTWAY
[Symbol]	TYPE 03: PERMEABLE TEGULA AREA
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[Symbol]	TYPE 10: RUBBER CRUMB
[Symbol]	TYPE 11: GRASS MATTA
[Symbol]	TYPE 13: PERMEABLE GRAVEL FOR RAIN GARDEN TREE FITS
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[Symbol]	PROPOSED HEDGE
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LEVELS	
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[Symbol]	PROPOSED



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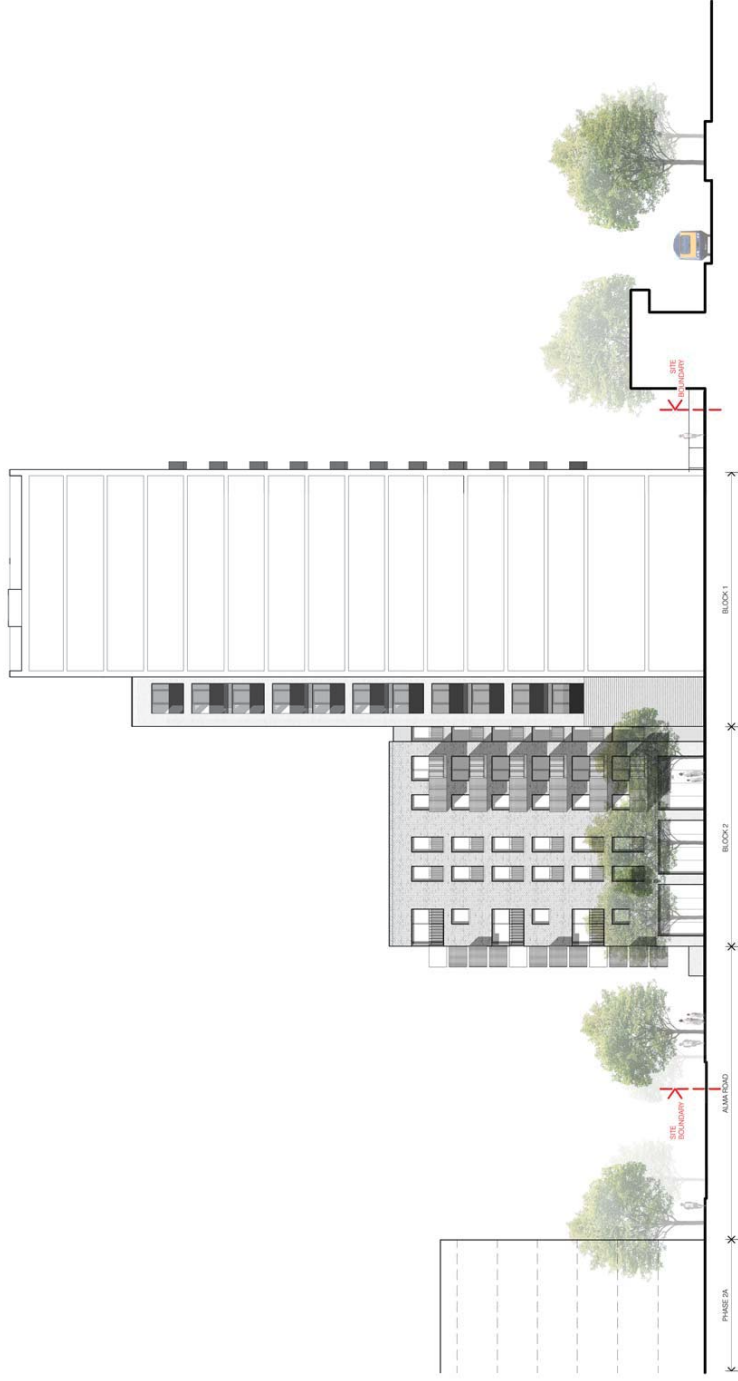
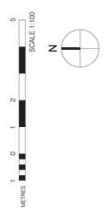
Rev	Description	Date
A	SECURITY GATE & SUDS	17.07.15

Project title
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 Drawing title
LANDSCAPE GENERAL ARRANGEMENT DETAIL PLAN SHEET 2 OF 2

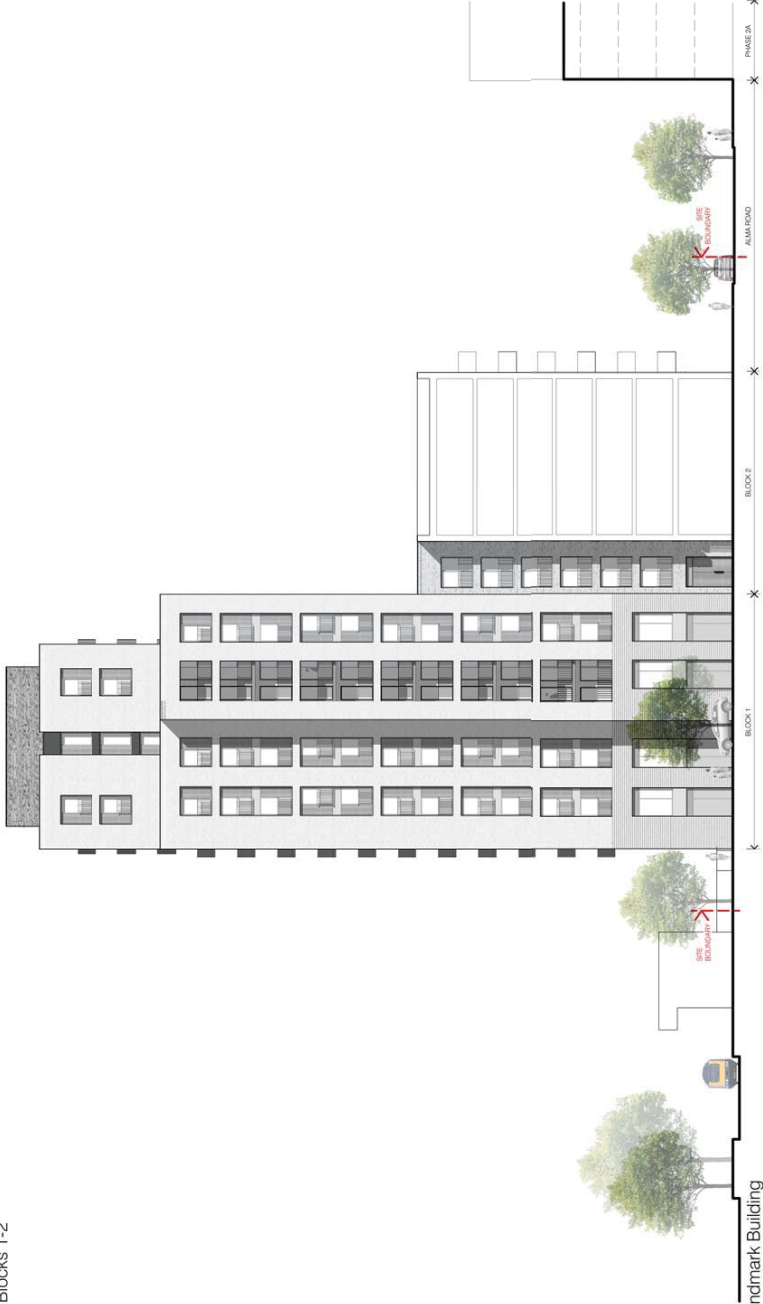
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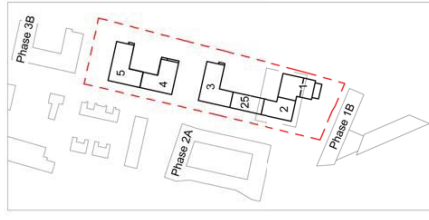
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 For any further information, please refer to the Architect and other consultants.



South Elevation - Blocks 1-2



North Elevation - Landmark Building



17 May 2015 INITIAL PLANNING ISSUE
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 12_560 IT LB 1: 200 @ A1 May 2015
 560_FULL_PL(00)201

PLANNING

Pollard Thomas Edwards
 33 Colman Street
 London EC3A 3DP
 Tel: +44 (0)20 7323 4500
 Fax: +44 (0)20 7323 4501
 www.pollardthomasedwards.co.uk

Project: Alameda Regeneration
 Drawing Number: South/Elevations_Book 1.2
 Date: 17 May 2015

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All notes are in metric unless otherwise stated.

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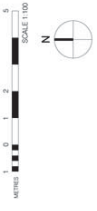
SETTING OUT NOTES

All setting out to be confirmed on site prior to construction. All dimensions are in millimetres unless noted.

All setting out to be based on structure or top of ground.

All dimensions are in millimetres unless noted.

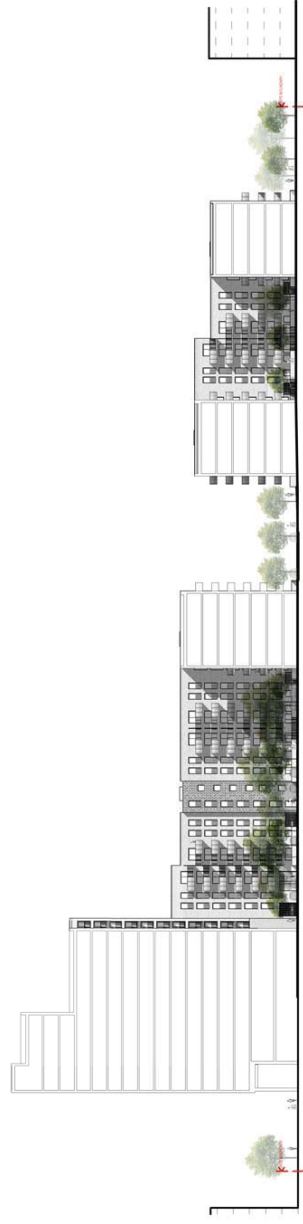
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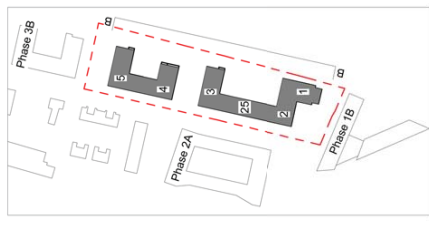
Blocks 1-4 - Courtyard Elevation



Blocks 4.5 - Courtyard Elevation



Phase 1A - Courtyard Elevation 1:500



7 May 2015 INITIAL PLANNING ISSUE
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 01/15

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Pollard Thomas Edwards

23 Colman Street
 London EC1A 3JF
 Telephone: 020 7493 8800
 Fax: 020 7493 8801
 Email: info@pollardthomasedwards.co.uk
 Website: www.pollardthomasedwards.co.uk

Project: Arden Estate Regeneration
 Location: East Devon - Courtyard
 Drawing Number: 560_FUL_PL(00)205
 Date: / /

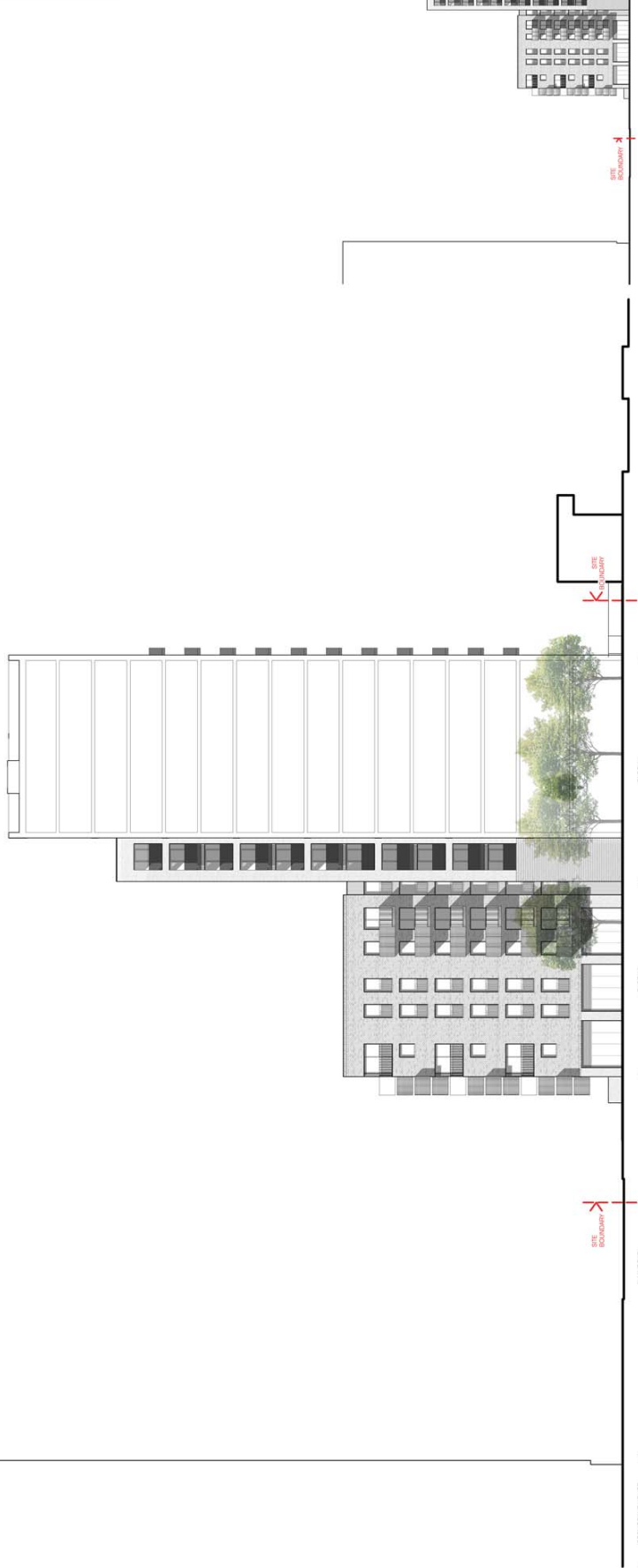
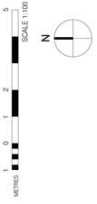
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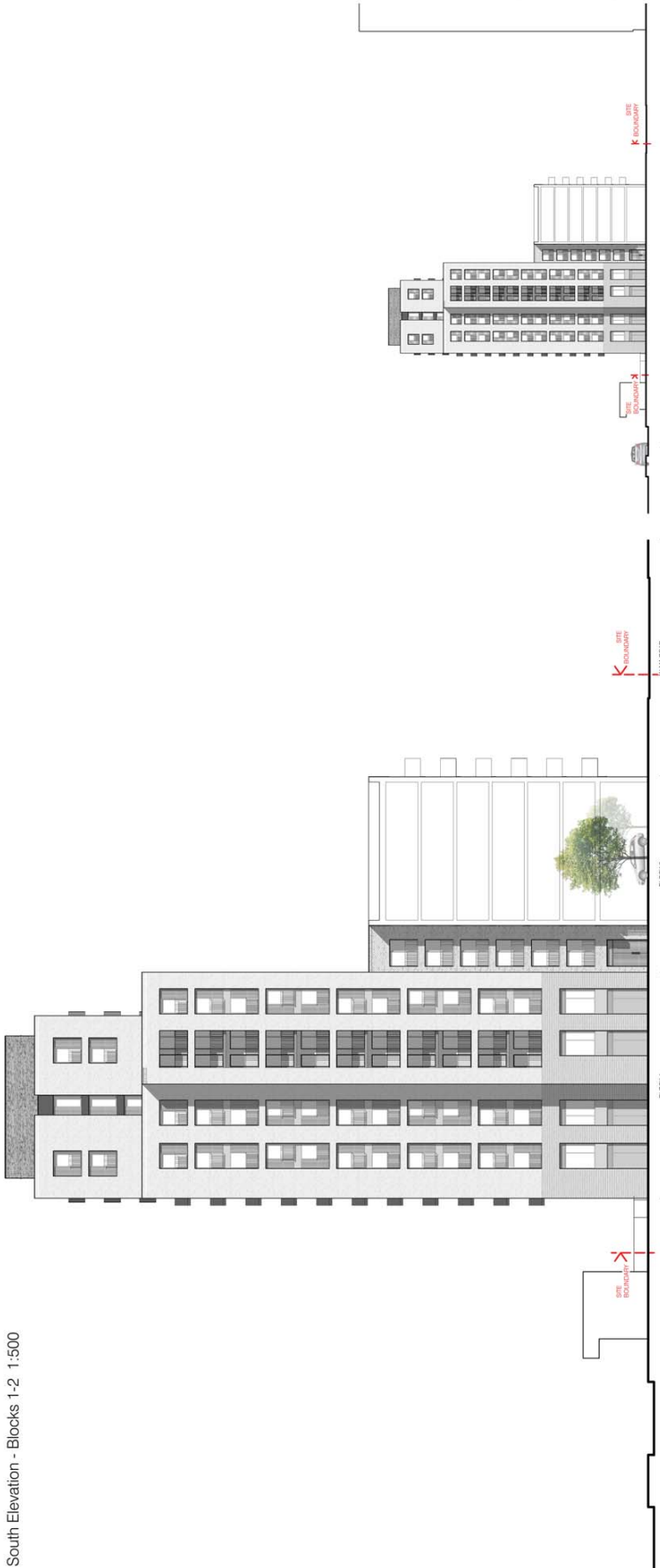
All dimensions are in millimetres unless noted.

All levels are in metres above Ordnance Datum unless noted otherwise.

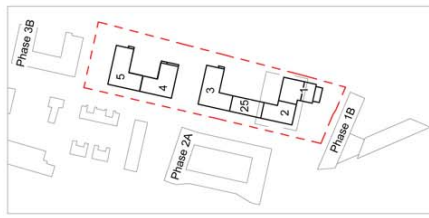
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South Elevation - Blocks 1-2



North Elevation - Landmark Building 1:500



PLANNING

7 May 2015 PTEA PLANNING ISSUE 01/2015
 DRAWN BY: JAV
 CHECKED BY: JAV

Pollard Thomas Edwards

Project: Alan Easton regeneration
 Location: 23 Cornhill Street, London W1R 3BQ
 Contact: 020 7460 1000
 Email: info@pollardthomasedwards.co.uk
 Website: www.pollardthomasedwards.co.uk

Scale: 12_560 IT LB As indicated/May 2015
 Drawing Number: 560_FUL_PL(00)207

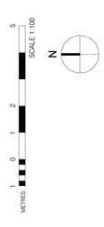
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All materials are to be as shown in the schedule unless noted otherwise.

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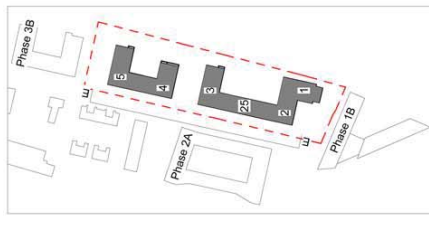
West Elevation - Blocks 1, 2, 25 & 3 1:200



West Elevations - Blocks 4&5 1:200



West Elevation - Phase 1A 1:500



May 2015 PTE PLANNING ISSUE
 1/2015
 1/2015

PLANNING

Project: West
 20 Cornhill Street
 London E1 1JX
 (020) 7461 1111
 www.pollardthomasedwards.co.uk

Project: Arma Estate Regeneration
 12_560 IT LB As indicated/May 2015
 Drawing No: 560_FUL_PL(00)208
 Date: / /

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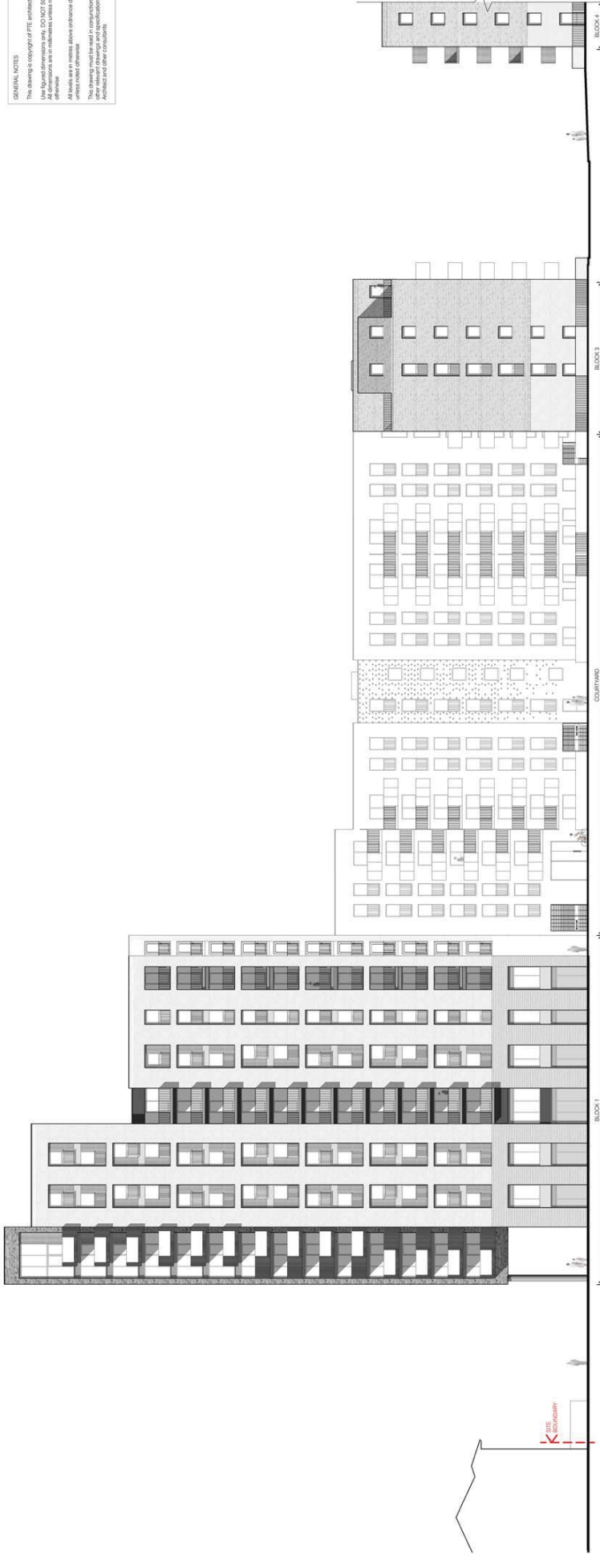
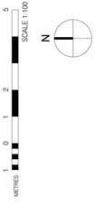
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SETTING OUT NOTES

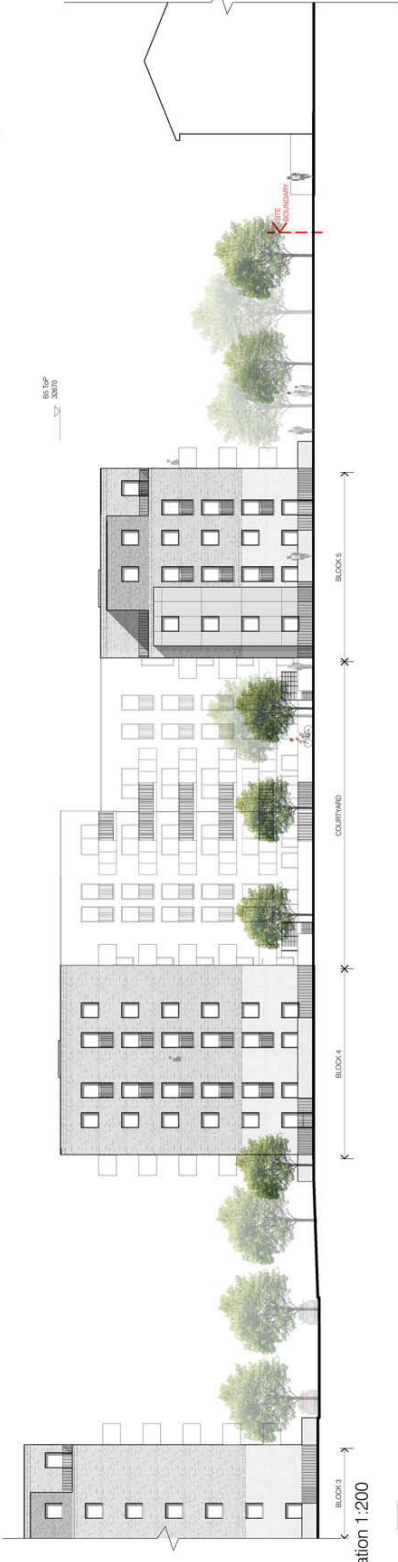
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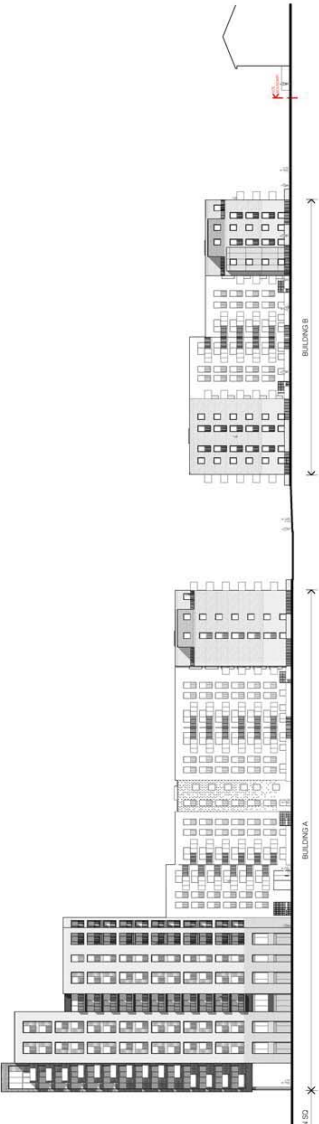
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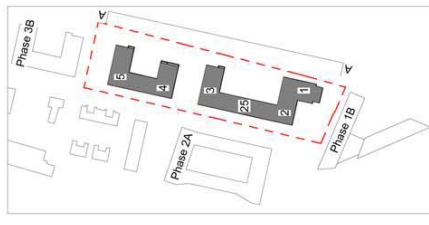
Blocks 1-4 - East Elevation 1:200



Blocks 4.5 - East Elevation 1:200



Phase 1A - East Elevation 1:500



May 2015 INITIAL PLANNING ISSUE
 JN LB
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PLANNING

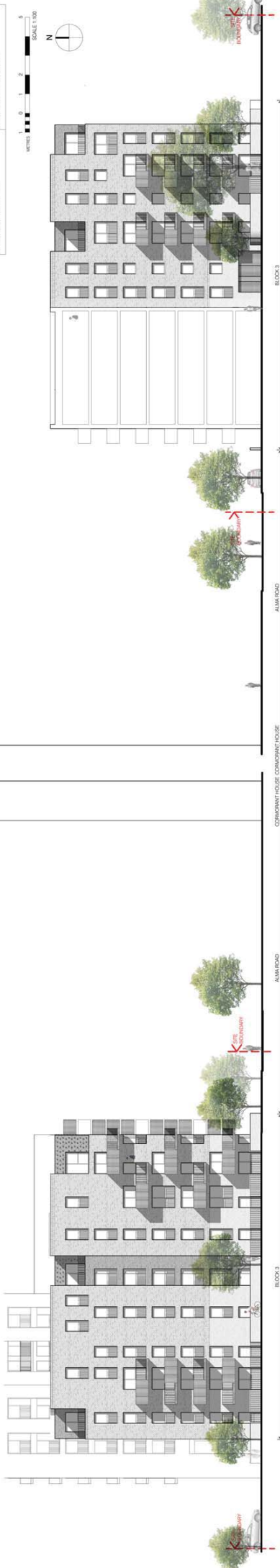
**Pollard
 Thomas
 Edwards**

Plot 10, 11 & 12, 20
 20 Cornhill Street
 London EC3A 3JX
 Tel: +44 (0)20 7626 2600
 Fax: +44 (0)20 7626 2601
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Project: Arena Estate Regeneration
 Drawing No: 12_560 IT LB As indicated/May 2015
 Drawing Date: 560_FUL_PL(00)209 /

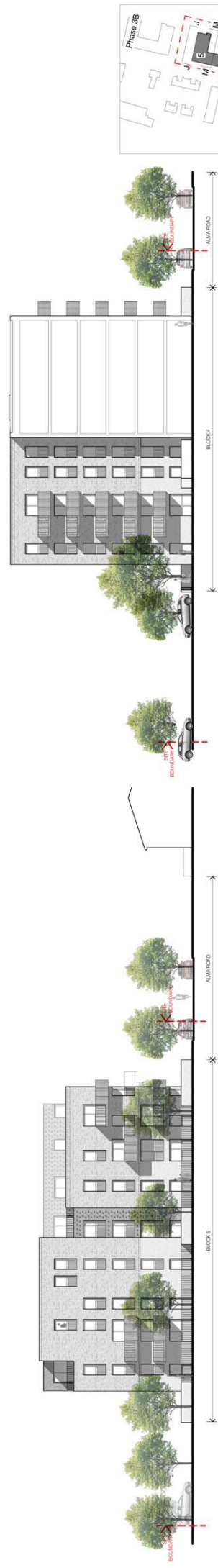
GENERAL NOTES
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SETTING OUT NOTES
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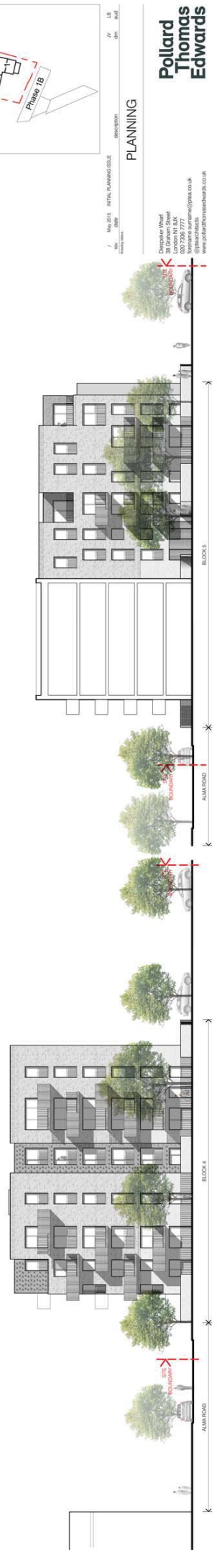
South Elevation - Block 3

North Elevation - Block 3



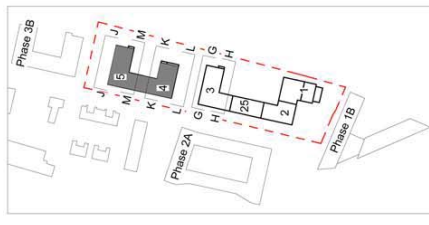
North Elevation - Block 4

North Elevation - Block 5



South Elevation - Block 5

South Elevation - Block 4



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Project: Arava Eastern Regeneration
 Drawing No: 12_560 IT LB 1:2006(A) May 2015
 Drawing Title: North/South Elevations - Block 5 in Street Context
 Drawing Code: 560_FUL_PL(00)210

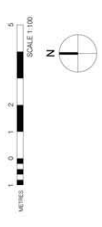
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All elevations are to be shown above ground level unless noted otherwise.

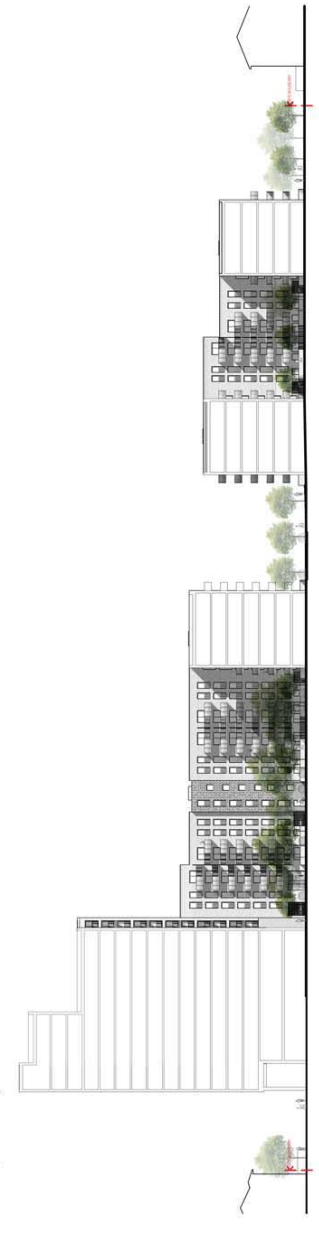
This drawing must be read in conjunction with all other drawings and documents forming the contract documents. For further information, please refer to the Architectural and other documents.



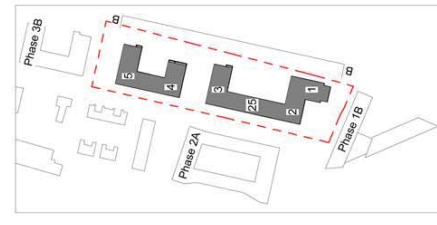
Blocks 1-4 - Courtyard Elevation 1:200



Blocks 4,5 - Courtyard Elevation 1:200



Phase 1A - Courtyard Elevation 1:500



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Project: Anna's Estate Regeneration
 Date: 12_560 IT LB As indicated/May 2015
 Drawing No: 560_FUL_PL00211