

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 17th December 2015

Report of
Assistant Director, Planning &
Environmental Protection

Contact Officer:
Andy Higham
Sharon Davidson
Mr R. Singleton

Ward:
Highlands

Ref : 15/04547/FUL

Category: Major Large Scale –
Dwellings

LOCATION: Chase Farm Hospital, The Ridgeway EN2 8JL

PROPOSAL: Minor material amendment to 14/04574/OUT to revise the approved plan numbers (condition 1) for the redevelopment of site for mixed use to provide up to 32,000sq m of replacement hospital facilities, construction of a 3-form entry primary school including temporary facilities pending completion of permanent school and construction of up to 500 residential units, provision of additional hospital access opposite Ridge Crest and provision of egress to the school site via Shooters Road, involving demolition of hospital buildings and associated residential blocks, partial demolition of Clock Tower complex, removal of microwave clinical waste treatment plant and fuel oil burner, retention of Highlands Wing, retention and extension of existing multi-storey car park, provision of associated car parking, cycle parking, plant, hard and soft landscaping, public realm improvements and associated works. (Outline application: Access)

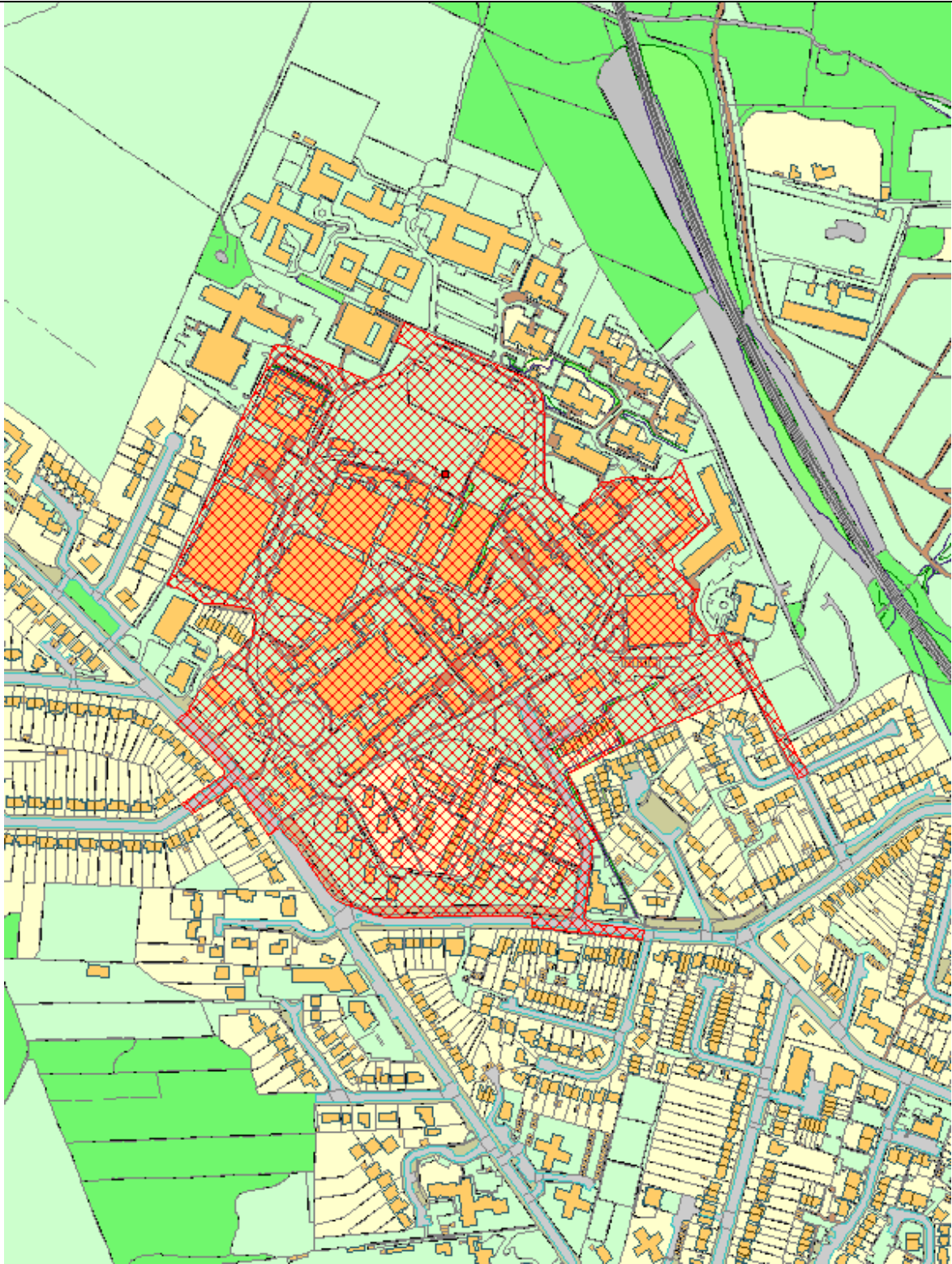
Applicant Name & Address:
Royal Free London NHS Foundation Trust
C/O Agent

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

RECOMMENDATION:

That planning permission to be **GRANTED** subject to conditions and a deed of variation to the existing s106 to reflect the subject consent.

Ref: 15/04547/FUL LOCATION: Chase Farm Hospital, The Ridgeway, EN2 8JL,



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Scale 1:5000

North



1. Site and Surroundings

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

2. Proposal

- 2.1 This is a s73 application for a minor material amendment to an outline planning consent granted under ref: 14/04574/OUT for the redevelopment of the site for mixed use to provide up to 32,000sq m of replacement hospital facilities, construction of a 3-form entry primary school including temporary facilities pending completion of permanent school and construction of up to 500 residential units, provision of additional hospital access opposite Ridge Crest and provision of access to the school site via Hunters Way, involving demolition of hospital buildings and associated residential blocks, partial demolition of Clock Tower complex, removal of microwave clinical waste treatment plant and fuel oil burner, retention of Highlands Wing, retention and extension of existing multi-storey car park, provision of associated car parking, cycle parking, plant, hard and soft landscaping, public realm improvements and associated works.
- 2.2 The original t outline application was reported to Planning Committee on 12th March 2015 when Members resolved to grant planning permission subject to

conditions, the Stage II Referral of the application to The Mayor of London and no objections being raised and subject to the satisfactory completion of a section 106 agreement.

- 2.3 The s106 Agreement has been engrossed and the Mayor was content to allow the Council to determine the case. Accordingly planning permission was issued on 28th October 2015.
- 2.4 In the intervening period, the Royal Free NHS Foundation Trust and their consultants have sought to progress detailed design works for the new hospital facility in preparation for the discharge of all relevant reserved matters associated with the hospital development phase. The wider social imperative to provide a modern state-of-the-art facility as well as funding pressures have driven this process to ensure a timely delivery of this much needed hospital.
- 2.5 In refining the detailed design, it soon became apparent that some aspects of the physical parameter plans were drawn too tightly and were too restrictive to enable the delivery of the high quality development promised as part of the original submission and one that would accord with the aspirations of the Trust and the wider community. The realised scheme, therefore, has evolved to such an extent that minor amendments to the original outline parameters are required to accommodate these changes and as the Trust claims would facilitate delivery of *‘a significantly better facility to deliver healthcare than the illustrative layout could do.’*
- 2.6 For clarity, the stated amendments are summarised in the following table:

Plan Title – Outline Application	Plan Title – MMA	Description of Change
Hospital Parcel Parameter Plan D360 – Areas	IBI-WS-XX-PL-100-017_Parcel Hospital – Areas	The approved parameter plan showed the development zone (shaded yellow) drawn specifically to fit the illustrative scheme prepared at the time of the outline application. The refinement in the design has shown what the Trust describes as an improved building layout which consequently would project slightly outside this shape on the north side whilst staying wholly within the hospital development parcel and maintaining the access roads proposed in the approved parameters. The amended development zone will be slightly larger than the original one where it is claimed the enlarged zone would provide flexibility for the detailed proposals to respond to healthcare needs whilst maintaining appropriate relationships with the site as a whole.
Hospital Parcel Parameter Plan D361 – Heights	IBI-WS-XX-PL-100-018_Parcel Hospital – Building Heights	The approved parameter plan provided maximum heights for various areas within the development zone (including

		<p>the main hospital, car park and energy centre). The improved building layout does not increase the maximum height overall, however, in some areas the reconfiguration of the hospital building particularly as a result of the introduction of a strong diagonal offset means that the heights of the building will be slightly increased from those originally envisaged, whilst elsewhere they will be slightly lower.</p> <p>To the area currently occupied by the maternity block, the Trust considered that the original parameter plans for height to this area of the site was too restrictive and was in fact far lower than the existing structure on site. In this regard, the submitted plans have been altered to reflect – but not exceed – the current height of the maternity block to install a degree of flexibility both for future expansion but also in the size and specification of the energy centre.</p>
Hospital Parcel Parameter Plan D362 – Access	IBI-WS-XX-PL-100-019_Parcel Hospital – Access	No material changes are proposed to the access into the Hospital Parcel, but the access into the extended Multi-Storey Car Park has required some minor amendments. The plan has also been revised to show the amended development zones.
Parameter Plan D351 – Access Plan for Vehicles	IBI-WS-XX-PL-100-015_Site Access Plan For Vehicles	<p>The minor amendments to access and the development zones within the Hospital Parcel as shown on plan IBI-WS-XX-PL-100-014 are copied onto an updated version of this plan for consistency, but no changes are proposed to the overall site wide access arrangements.</p> <p>For Members information, this also means that the agreed access and egress arrangements for the school – namely access via Hunters Way with managed egress to Shooters Road – remain unaltered from the parent consent. Relevant plans have consequently been updated to reflect this position.</p>
Parameter Plan D352 – Access Plan for Route Widths	IBI-WS-XX-PL-100-016_Site Access Plan For Route Widths	The minor amendments to the development zones within the Hospital Parcel as shown on new plan IBI-WS-XX-PL-100-017 are copied onto an updated version of this plan, but the

		route widths are unchanged.
Parameter Plan GB1010103-D-302 – Parcel Zones and area G	IBI-WS-XX-PL-100-020_Parcel Zones And Areas	The minor amendments to the development zones within the Hospital Parcel as shown on plan IBI-WS-XX-PL-100-017 are copied onto an updated version of this plan, but the parcels themselves are unchanged.
Parameter Plan D320 – Areas – Parcel Zone B2	IBI-WS-XX-PL-100-012_Parcel Zone B2 – Areas	Minor changes are proposed to this Development Zone at the interface of the Hospital Parcel and Parcel Zone B2 to ensure a suitable interface between the scale and location of the new hospital building and the adjoining residential development. Part of the frontage of the housing parcel is realigned to increase the distance from the hospital building, with minor consequential changes to potential layout. In addition, the corner of the proposed apartment block is chamfered slightly to provide an improved visual aspect and more closely align the reorientation of the main bulk of the hospital to create an urban grain that responds positively to the principal civic space.
Parameter Plan D321 – Heights – Parcel Zone B2	IBI-WS-XX-PL-100-013_Parcel Zone B2 – Building Heights	The minor changes to the Development Zone in this Parcel are copied onto the base of this plan, with associated minor repositioning of height parameters. No material changes are proposed to heights themselves.
Parameter Plan D322 – Access – Parcel Zone B2	IBI-WS-XX-PL-100-014_Parcel Zone B2 – Access	The minor changes to the Development Zone in this Parcel are copied onto the base of this plan. No material changes are proposed to access however.

Table 1: Schedule of Changes

Plan Title – Outline Application	Plan Title – MMA	Description of Change
D-016 Sections Existing and Proposed CC – DD	IBI-WS-XX-SE-100-001_Indicative Site Sections Existing And Proposed CC, DD	As a consequence of the changes to the parameter plans, the Illustrative Plans have been adjusted accordingly and now reflect the revised hospital layout, the minor adjustment to the position of a residential block to the north east corner of the hospital, and the chamfering of the apartment block to the north of the civic plaza. Members are advised that this application remains outline with all matters – with the exception of access – reserved. The plans are for illustrative
D-017 Site Sections Existing and Proposed EE	IBI-WS-XX-SE-100-002_Indicative Site Sections Existing And Proposed EE	
D-043 Site Plan – With School	IBI-WS-XX-PL-100-009_Site Plan – with School	

D-047 Illustrative Site Plan – With School	IBI-WS-XX-PL-100-011_Illustrative Site Plan – with School	purposes only and this application does not seek consent for these layouts, they merely serve as an indication of how the quantum of development may be accommodated within the site. Detailed plans for the redevelopment of the respective plots (including the hospital) will be the subject of separate submissions for a discharge of each of the reserved matters. These applications will be occasioned at Planning Committee at a later date for consideration.
D-901 Landscape Masterplan	IBI-WS-XX-PL-100-010_Landscape Masterplan	

Table 2: Schedule of Changes to Illustrative Plans

2.7 The parent application allowed for potential future expansion / net uplift of floor area to include land to the north and south of the main hospital for more formalised expansion of up to 8,000 sq.m. In the reconfiguration and refinement of the hospital parcel, those areas identified as future expansion space have also had to be reconfigured. The Trust remain committed to safeguard the long term future of the hospital to create a flexible and responsive hospital capable of adaption and expansion to accommodate the changing needs of a growing population and hence as part of the subject application a consequential reconfiguration of expansion areas has been provided. While this would not form part of the application for approval, members are advised that areas to include a new site directly adjacent to the energy centre, vertical expansion space over the low rise elements to the north and south of the main hospital building and a refined area to the green to the south of Highlands Wing have been identified to accommodate up to 7,500-8,500 sq.m of future expansion space to accommodate future need as illustrated below:

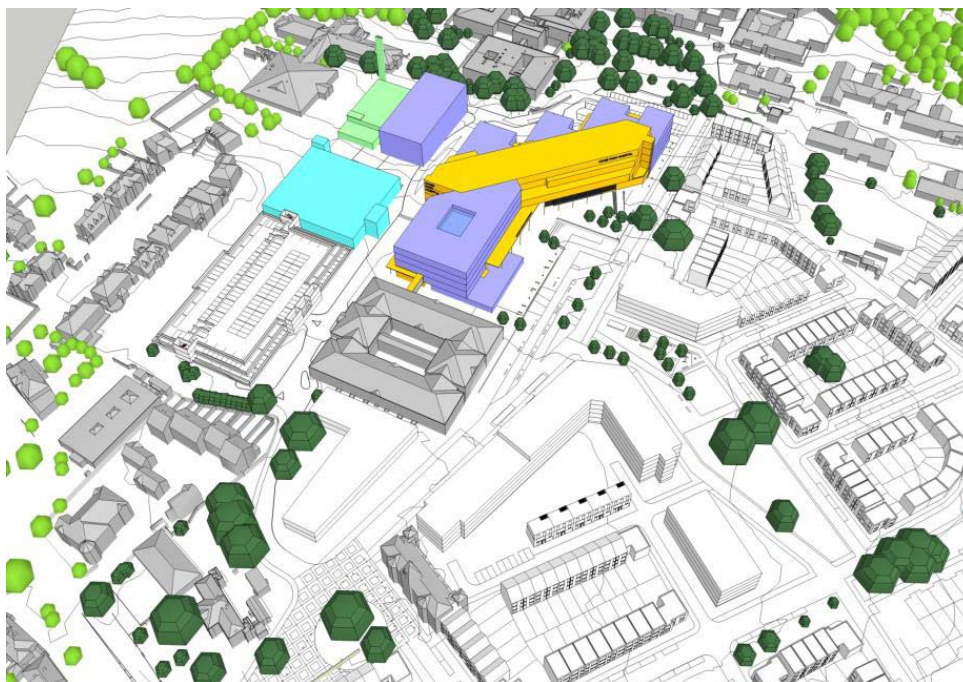


Illustration 1: Future Expansion Space

2.8 For the avoidance of doubt, Members are advised that the development parameters outside of those stated in the above table **remain completely unchanged** from the parent application under ref: 14/04574/OUT. Therefore, in the interests of clarity the following items are consistent with the previously approved scheme:

- The description of the development
- The quantum of development to include:
 - The demolition of approximately 36,833 sq.m (GIA) of existing healthcare floorspace.
 - The demolition of 7,877 sq.m (GIA) of residential floorspace
 - The retention and refurbishment of the Highlands wing for continued hospital use.
 - The retention and refurbishment of the central Clock Tower for residential use.
 - The retention and extension of the existing multi-storey car park to the north of the site to provide parking for up to 900 cars servicing the hospital.
 - The construction of up to 32,000 sq.m (GIA) of healthcare floorspace with a total resultant area (including Highlands Wing) of 36,723 sq.m (GIA) of health care floor space with safeguarded future expansion space around the hospital parcel.
 - Provision of up to 800 sq.m of floor area reserved within the hospital site for primary healthcare uses.
 - The construction of up to 45,435 sq.m (GIA) of residential floor area to provide up to 500 residential units with an indicative accommodation mix of 2, 3 & 4-bed houses (62% of total) and 1, 2 & 3-bed apartments (38% of total) and including the accommodation approximately 1 car park space per property.
 - Construction of 3,600 sq.m (GIA) of educational floor space to provide a 3 form entry primary school with approximately 35 car parking spaces and a 1000 sq.m Multi Use Games Area (MUGA).
 - Construction of a 630 sq.m (GIA) temporary school.
 - The introduction of new public open space, public realm and private amenity space.
 - The removal of a microwave clinical waste treatment plant and the provision of a centralised energy centre to provide future potential to create a localised heat network connecting each of the stated uses across the site.
- The provision of infrastructure, landscaping and protected trees
- Affordable housing provision
- The boundaries of the various development parcels
- The relationship of the proposals to the Barnet Enfield Harringey Clinical Strategy
- Sustainable Design and Construction credentials and provision of a Decentralised Energy Network
- The principles of access to include:
 - The relocation and formation of a new vehicle and pedestrian access to the site adjacent to Ridge Crest.
 - The provision of a new pedestrian crossing to Lavender Hill
 - The retention of access points to Hunters Way and Shooters Road.

- Routing of interim and permanent school access via Hunters Way with one way egress via Shooters Road including provision of new connecting road and control measures.
- 2.9 The indicative Masterplan, has been designed to incorporate relevant Local Plan standards and the indicative scale and massing layer show development with varying heights across the site. Aside from the amendments in tables 1 & 2, the site wide parameters and Framework Design Code for the residential and school elements of the scheme also remain unchanged. Residential houses are indicated as being between 2-3 storeys with apartment blocks ranging between 3-5 storeys depending on their location. The development reaches critical mass towards the centre of the site and adjacent to the hospital, where through pre-application discussions it was considered that the site could accommodate an increase in overall scale. Development to Lavender Hill and the Ridgeway possess a far more modest and human scale positively responding to the suburban residential pattern of development indicative of the surrounding area. The permanent school would reach a maximum of 3 storeys, with the temporary school built over a maximum of 2 storeys. Due to the topography of the site, the main hospital building will reach a maximum of 5 storeys in height.
- 2.10 The Trust have also asked that the Local Planning Authority consider enabling works as part of the subject application and under the provisions of section 96A whereby a Local Planning Authority in England may make a change to any planning permission relating to land in their area if they are satisfied that the change is not material. The works comprise a reduce level dig and are required to facilitate prompt commencement of works to the new hospital once planning approval for the Reserved Matters application has been obtained. The Trust consider that the works are a critical programme activity to facilitate the rest of the works and to allow the new hospital to open by the summer of 2018. They advise that any delay to the works will directly impact on both enabling patients to benefit from the new facilities as soon as possible and the cost of the scheme to the NHS and could in turn will also delay the Trust's ability to release the full portion of the site required for the new primary school.
- 2.11 The works are a cut and fill operation to provide a level platform for the piling rig to then install the bored piles for the contiguous piled wall. The wall is required to allow further excavation for the lower ground floor of the hospital under this revised scheme. Works to the wall will not commence until the Council have determined the Reserved Matters application under ref: 15/05021/RM. The Trust, therefore, are asking the Council to allow the enabling works to take place prior to the discharge of planning conditions, and agree as a non-material amendment to the original outline consent. Members are advised that the Trust accept the full risk of proceeding with the works and recognise that should the Reserved Matters Application not be approved for the Healthcare element then the Trust would be fully liable. The Trust also understand that the retaining wall construction cannot start until after the Trust has satisfactorily discharged all pre-commencement conditions and S106 obligations and had the reserved matters approved.

3. Relevant Planning Decisions

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

- 3.2 14/04574/OUT – Redevelopment of site for mixed use to provide up to 32,000sq m of replacement hospital facilities, construction of a 3-form entry primary school including temporary facilities pending completion of permanent school and construction of up to 500 residential units, provision of additional hospital access opposite Ridge Crest and provision of egress to the school site via Shooters Road, involving demolition of hospital buildings and associated residential blocks, partial demolition of Clock Tower complex, removal of microwave clinical waste treatment plant and fuel oil burner, retention of Highlands Wing, retention and extension of existing multi-storey car park, provision of associated car parking, cycle parking, plant, hard and soft landscaping, public realm improvements and associated works. (Outline application: Access) – Approved subject to conditions and s106 (28/10/15). In the interests of transparency, Members are advised that the committee report accompanying this application has been appended to the committee papers.
- 3.2 15/05021/RM – Submission of part reserved matters approved under 14/04574/OUT (for the replacement hospital facilities) in respect of appearance, landscape, layout and scale pursuant to condition 13 and details of siting, design and external appearance pursuant to condition 14, 15 and 16 of outline approval for the redevelopment of site to provide 36,764sqm of replacement hospital facilities, involving a part 5-storey hospital building, refurbishment of Highlands Wing, retention and extension of existing multi-storey car park, erection of a 3-storey detached energy building, hard and soft landscaping and associated works. (Outline application: Access) – Application registered with a determination date of 11/02/16. This application will be occasioned for consideration at planning committee early in the New Year.

4. Consultations

4.1 Statutory and non-statutory consultees

Greater London Authority:

- 4.1.1 The subject application is referable to the Mayor. A Stage 1 response to the application was issued 30th October 2015. A formal response was received 24th November 2015 stating that having reviewed the s73 submission noting that the quantum of development has not altered and with due regard to the comments of Transport for London, the GLA consider that the proposal does not raise any additional issues of strategic importance beyond those previously considered by the Mayor in respect to planning application ref: 14/04574/OUT.
- 4.1.2 In this regard, under article 5(2) of the Town and Country Planning (Mayor of London) Order 2008, the Mayor of London does not need to be consulted further on this application. Accordingly, the Local Planning Authority may proceed to determine the application without further reference to the Greater London Authority.

Transport for London:

- 4.1.3 TfL are content that these changes are minor and do not affect the consented scheme negatively.

Environment Agency:

- 4.1.4 The Environment Agency advise that they raise no objection to the development.

Metropolitan Police:

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

Barnet, Enfield and Haringey Mental Health NHS Trust:

- 4.1.6 No response received.

Thames Water:

- 4.1.7 No objections.

Tree Officer:

- 4.1.8 The Tree Officer has raised concerns about the impact of the changes to the main entrance plaza to the protected Cedar Tree. Additional information has been requested and discussions are ongoing. Any comments will be reported at the meeting.

Economic Development:

- 4.1.9 No objection and no further comments beyond those made under ref: 14/04574/OUT.

Environmental Health:

- 4.1.10 No objection and no further comments beyond those made under ref: 14/04574/OUT.

Traffic and Transportation:

- 4.1.11 No objection and no further comments beyond those made under ref: 14/04574/OUT.

4.2 Public response

- 4.2.1 The application was referred to 1162 surrounding properties, a press notice released (as featured in the Enfield Independent on 04/11/14) and 8 site notices were posted on and around the site. The consultation period expired 19/11/15. A total of 5 written responses were received objecting to the proposal on the following grounds (categorised for ease of reference):

Transport and Access

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

School

- Increased noise and disturbance
- Inappropriate location for a school

Residential

- Lack of supporting infrastructure (including water and sewerage)

Hospital

- Extension to multi-storey car-park unsightly
- Loss of clock tower hospital complex of historic importance

Sustainability

- Adverse impact to ecology
- Loss of trees
- Increased risk of flooding

4.2.2 Whilst the concerns of residents are noted in relation to the scheme, the principle of development and access arrangements have been established under ref: 14/04574/OUT and as the subject application does not seek to amend or alter elements of the scheme referred to in representations, the comments received can be attributed limited weight.

Rt. Hon Theresa Villiers MP:

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

5. Relevant Policy

5.1 The London Plan

Policy 2.6 – Outer London: vision and strategy
Policy 2.7 – Outer London: economy
Policy 2.8 – Outer London: transport
Policy 2.14 – Areas for regeneration
Policy 3.1 – Ensuring equal life chances for all
Policy 3.2 – Improving health and addressing health inequalities
Policy 3.3 – Increasing housing supply
Policy 3.4 – Optimising housing potential
Policy 3.5 – Quality and design of housing developments
Policy 3.6 – Children and young people’s play and informal recreation facilities
Policy 3.7 – Large residential developments
Policy 3.8 – Housing choice
Policy 3.9 – Mixed and balanced communities
Policy 3.10 – Definition of affordable housing
Policy 3.11 – Affordable housing targets
Policy 3.12 – Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.13 – Affordable housing thresholds
Policy 3.14 – Existing housing
Policy 3.15 – Coordination of housing development and investment
Policy 3.16 – Protection and enhancement of social infrastructure
Policy 3.17 – Health and social care facilities
Policy 3.18 – Education facilities
Policy 4.1 – Developing London’s economy
Policy 4.5 – London’s visitor infrastructure
Policy 4.12 – Improving opportunities for all
Policy 5.1 – Climate change mitigation
Policy 5.2 – Minimising carbon dioxide emissions
Policy 5.3 – Sustainable design and construction
Policy 5.5 – Decentralised energy networks
Policy 5.6 – Decentralised energy in development proposals
Policy 5.7 – Renewable energy
Policy 5.9 – Overheating and cooling
Policy 5.10 – Urban greening
Policy 5.11 – Green roofs and development site environs
Policy 5.12 – Flood risk management
Policy 5.13 – Sustainable drainage
Policy 5.15 – Water use and supplies
Policy 5.18 – Construction, excavation and demolition waste
Policy 5.21 – Contaminated land
Policy 6.9 – Cycling
Policy 6.10 – Walking
Policy 6.12 – Road network capacity
Policy 6.13 – Parking
Policy 7.1 – Building London’s neighbourhoods and communities
Policy 7.2 – An inclusive environment
Policy 7.3 – Designing out crime
Policy 7.4 – Local character
Policy 7.5 – Public realm
Policy 7.6 – Architecture
Policy 7.7 – Location and design of tall and large buildings
Policy 7.8 – Heritage assets and archaeology
Policy 7.9 – Heritage-led regeneration

Policy 7.14 – Improving air quality
Policy 7.15 – Reducing noise and enhancing soundscapes
Policy 7.16 – Green Belt
Policy 7.18 – Protecting local open space and addressing local deficiency
Policy 7.19 – Biodiversity and access to nature
Policy 7.21 – Trees and woodlands

Housing Supplementary Planning Guidance

5.2 Local Plan – Core Strategy

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

Biodiversity Action Plan
S106 SPD

5.3 Development Management Document

DMD1: Affordable housing on sites capable of providing 10 units or more
DMD3: Providing a mix of different sized homes
DMD4: Loss of existing residential units
DMD6: Residential character
DMD8: General standards for new residential development

DMD9: Amenity space
DMD10: Distancing
DMD15: Specialist housing need
DMD16: Provision of new community facilities
DMD17: Protection of community facilities
DMD18: Early years provision
DMD37: Achieving high quality and design-led development
DMD38: Design process
DMD42: Design of civic / public buildings and institutions
DMD43: Tall buildings
DMD44: Conserving and enhancing heritage assets
DMD45: Parking standards and layout
DMD47: New road, access and servicing
DMD48: Transport assessments
DMD49: Sustainable design and construction statements
DMD50: Environmental assessments method
DMD51: Energy efficiency standards
DMD52: Decentralised energy networks
DMD53: Low and zero carbon technology
DMD55: Use of roofspace / vertical surfaces
DMD57: Responsible sourcing of materials, waste minimisation and green procurement
DMD58: Water efficiency
DMD59: Avoiding and reducing flood risk
DMD60: Assessing flood risk
DMD61: Managing surface water
DMD62: Flood control and mitigation measures
DMD63: Protection and improvement of watercourses and flood defences
DMD64: Pollution control and assessment
DMD65: Air quality
DMD66: Land contamination and instability
DMD67: Hazardous installations
DMD68: Noise
DMD69: Light pollution
DMD70: Water quality
DMD71: Protection and enhancement of open space
DMD72: Open space provision
DMD73: Child play space
DMD76: Wildlife corridors
DMD77: Green chains
DMD78: Nature conservation
DMD79: Ecological enhancements
DMD80: Trees on development sites
DMD81: Landscaping
DMD82: Protecting the Green Belt
DMD83: Development adjacent to the Green Belt

5.4 Other Material Considerations

NPPF
NPPG
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

6. Analysis

6.1 The principle of the redevelopment of the site to provide a new hospital of up to 32,000 sq.m of floor area, up to 500 residential units and the provision of an interim and permanent primary school for three forms of entry (630 sq.m and 3,600 sq.m respectively) has been established under ref: 14/04574/OUT. The quantum of development and access arrangements have not altered as a result of the current submission and hence considerations in the assessment of the subject application are necessarily restricted to the impact of the scheduled amendments to the agreed parameters plan and whether these changes represent a minor material amendment in accordance with the relevant tests of s73 of the Town and Country Planning Act 1990. In this regard, the main issues to consider are as follows:

- i. Alignment with BEH Clinical Strategy
- ii. Development adjacent to the Green Belt;
- iii. Design;
- iv. Amenity of neighbouring properties;
- v. Highway safety;
- vi. Sustainability and biodiversity;
- vii. S.106 Obligations; and
- viii. Community Infrastructure Levy

6.2 Alignment with BEH Clinical Strategy

6.2.1 London Plan Policy 3.17 and CP7 of the Core Strategy seeks to support the provision of high quality health appropriate for a growing and changing population with a flexibility of form that can adapt to meet identified healthcare needs including the provision of urgent care centres. The Council is committed to work with the Enfield PCT, NHS London, and other public and private sector health agencies in delivering appropriate proposals for new health and social care facilities.

6.2.2 Under the parent application ref: 14/04574/OUT the principle of a new and enhanced hospital facility to the site was established. Issues relating to hospital service continuity, the reduction in healthcare floor space and alignment with the stated and established needs of the wider community as part of the BEH Clinical Strategy were considered in detail and deemed to be

compliant with the provisions of Policies 3.16 and 3.17 of the London Plan and Policy CP7 of the Local Plan.

6.2.3 The subject application does not seek to alter the quantum of development nor does it seek to update or adjust the BEH Clinical Strategy already considered stating as part of the submission that the relationship of the development to the BEH Clinical Strategy would remain unchanged. Therefore, it must be held that the tabled amendments are consistent with the scheme considered at planning committee and subsequently approved. Indeed, the refined design was driven by a desire to simplify movement and enhance the functionality of the hospital development to enhance the patient experience. The realised design is held to accommodate a greater flexibility in layout whilst both retaining the identified clinical service needs and maintaining the sufficient capacity on site to accommodate future expansion to better respond to the changing needs of a growing population. The main driver of the scheme to provide a modern and fit-for-purpose healthcare facility remains unaltered and it can be held that the evolution of the design has served to further enhance the development proposal to the benefit of the wider community. In this regard, it is considered that the tabled amendments have not materially altered the principle, quantum or objectives for hospital delivery to the site and a minor material amendment can be agreed.

6.2.4 All matters secured by way of condition or s106 agreement as part of the parent application will be reiterated as part of the subject application including, but not limited to:

- Hospital delivery
- Hospital continuity plan
- Future expansion
- Primary Care enabling
- Alignment with BEH Clinical Strategy
- Detailed design

6.3 Development Adjacent to the Green Belt

6.3.1 Policy DMD83 of the Development Management Document also seeks to govern development adjacent to the Green Belt, or development deemed to impact upon its setting. In this regard, proposed development located next to or within close proximity to the Green Belt will only be permitted if all of the following criteria are met:

- a. There is no increase in the visual dominance and intrusiveness of the built form by way of height, scale and massing on the Green Belt;
- b. There is a clear distinction between the Green Belt and urban area;
- c. Views and vistas from the Green Belt into urban areas and vice versa, especially at important access points, are maintained.

6.3.2 In addition, proposals should maximise opportunities to incorporate measures to improve the character of land adjacent to the Green Belt through environmental improvements such as planting and earth moulding, and the removal or replacement of visually intrusive elements such as buildings, structures, hard standings, walls, fences or advertisements.

- 6.3.3 Development must not restrict future public access/ rights of way from being provided. Where possible proposed development should increase opportunities for public access.
- 6.3.4 As part of the original submission, a Visual Impact Assessment (VIA) accompanied the scheme. Four wireline viewpoints were agreed to form the basis of the analysis as these areas were deemed to offer the most conspicuous views of the site from the surrounding Green Belt (see illustration below). Consistent with this approach, an updated VIA has been submitted to assess the impact of the changes to the parameters plan, notably in relation to a reorientation and reconfiguration of the hospital site which would potentially increase the visual bulk of the development from certain vantage points.

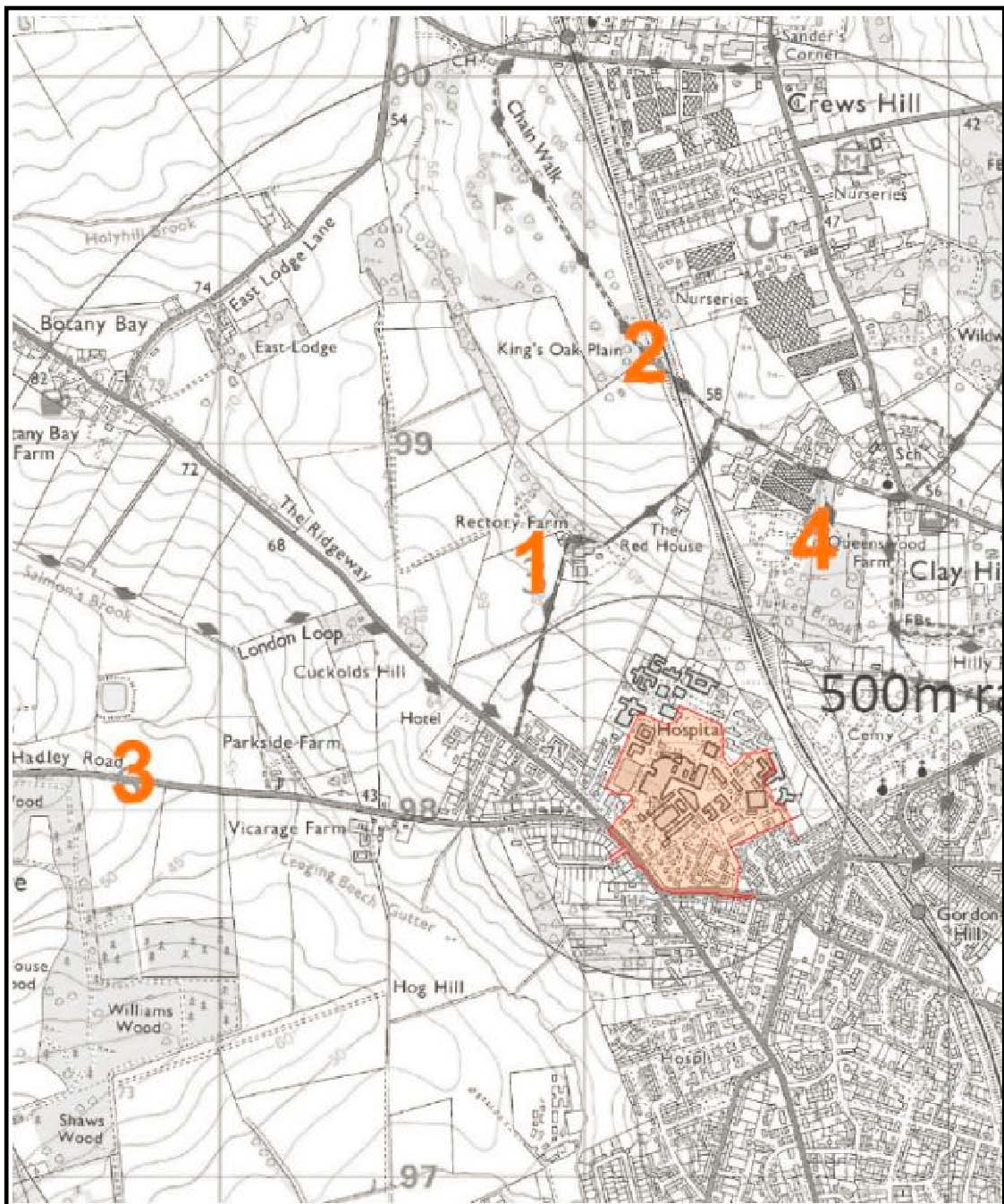


Illustration 3: VIA vantage points

- 6.3.5 The updated analysis when compared to the previously approved scheme concludes that the impact of the development from a number of the vantage point would largely be screened by vegetation or seen within the context of an established urban edge. Again, views from the Strayfield Road Cemetery to the north east of the site (due to the surrounding topography) was by far the most conspicuous location for views to the hospital site, however, views toward the site that were capable of exposing the hospital site were limited to the north east corner of the cemetery as it stretches out towards Clay Hill. Even from this vantage point, views across the site were fleeting as existing vegetation and the Gordon Hill railway bridge would quickly obstruct views as individuals travelled down the steep gradient.
- 6.3.6 In this regard, Policy DMD43 of the Development Management Document seeks to manage the design and siting of tall buildings. By virtue of the Policy tall and large buildings are defined as those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor. In relation to developments within or adjacent to Green Belt sites, tall buildings are considered to be inappropriate.

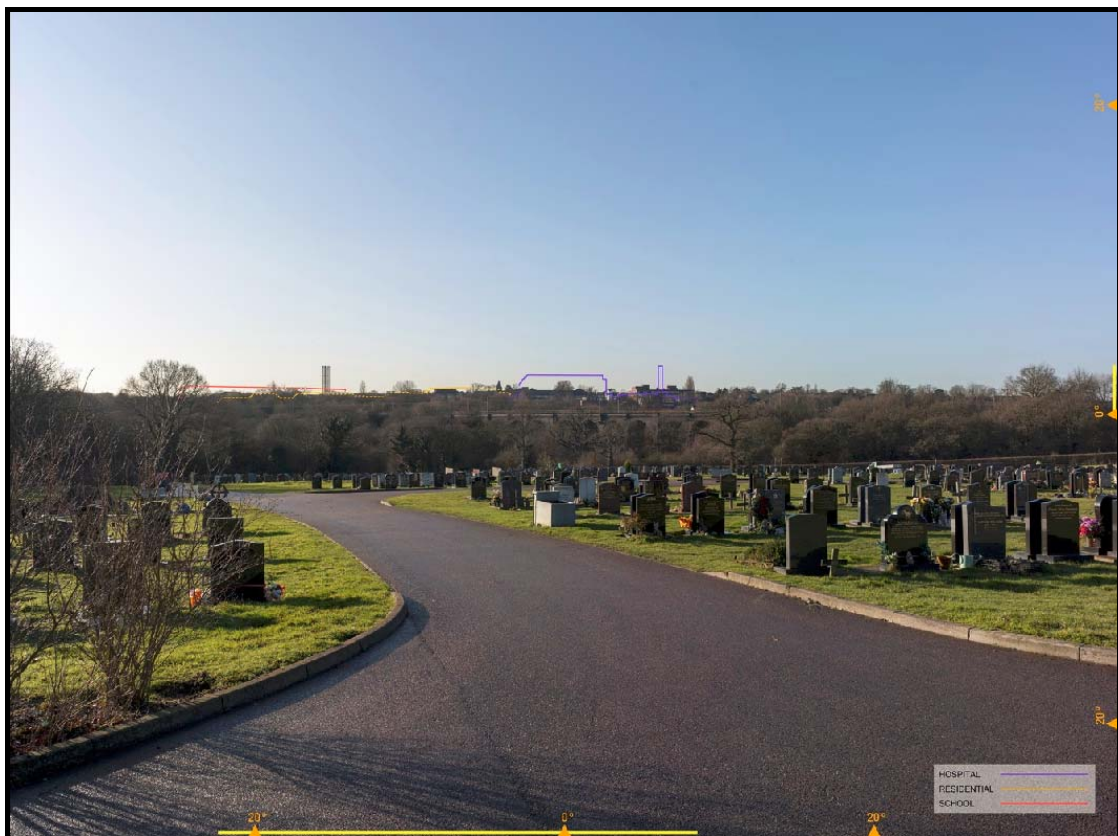


Photo 1: View point 4 14/04574/OUT

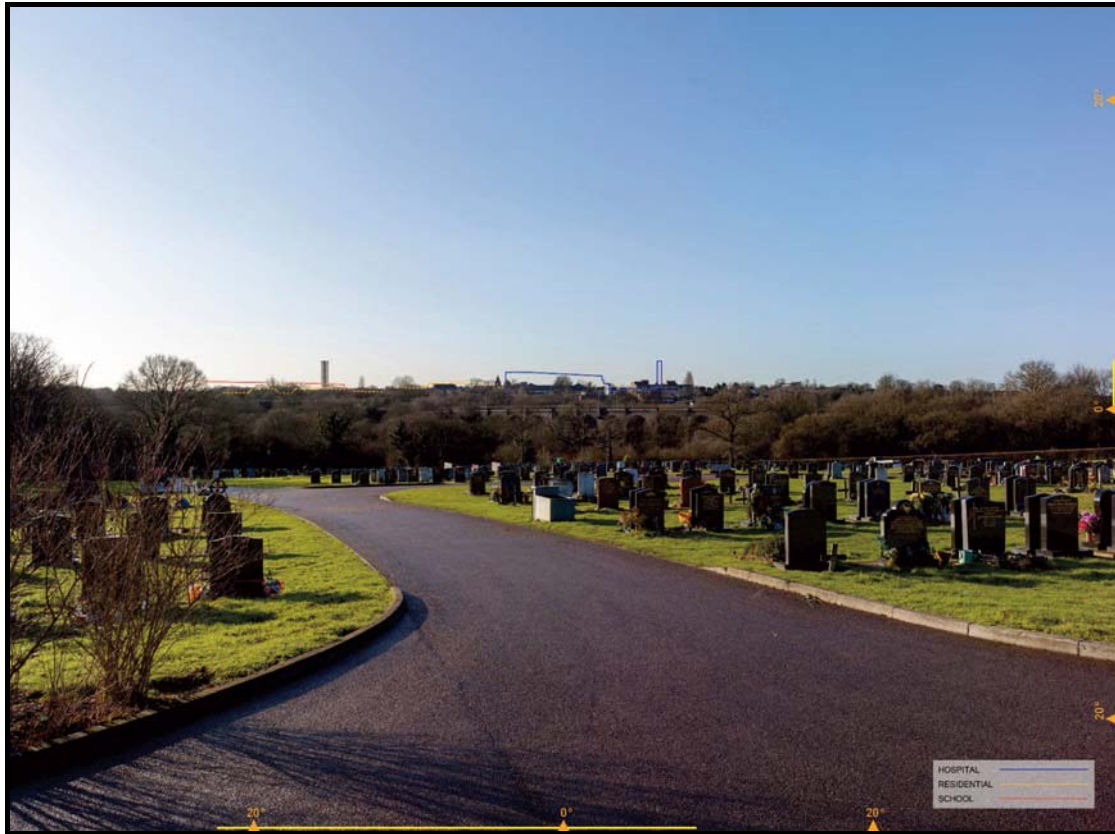


Photo 2: View point 4 15/04547/FUL

6.3.7 While it is acknowledged that the overall bulk and massing of the site would be increased as a result of the development, and indeed that the reconfigured hospital site would serve to increase the bulk of the development across the horizontal axis, vertically the overall height of the development would appear reduced. Consistent with the deliberations of the approved scheme, the VIA is correct in its assertion that from each of the vantage points (and in particular the one to the cemetery), the presence of the existing hospital is already visible and would serve to define an accepted urban edge. The tabled changes to the scheme when taken in context are relatively minor in nature and with a reduction in the discernible height of the development overall would achieve a consistent and acceptable balance with the previously consented scheme.

6.4 Design

Density

6.4.1 The quantum of development to the site remains unchanged as a result of the change to the parameters of the hospital development. In this regard, the principle for development of the quantum established under ref: 14/04574/OUT remains applicable to the subject scheme and thereby deemed acceptable.

Layout, mass, bulk and height

6.4.2 Consistent with the core principles of the London Plan, the Core Strategy and Development Management Document well considered, high quality, design-

led development is central to achieving a balanced and sustainable development. Developments should be of the highest quality internal, externally and in relation to the wider environment providing an attractive and functional public realm, clear legible for users, but one that adapts to changing needs and fosters a sense of community. New development is required to have regard to its context, and make a positive contribution to local character.

6.4.3 The revised scheme is again submitted under an outline application with matters relating to detailed design reserved at this stage, however, in the refinement of the hospital parcel a revised illustrative Masterplan has been submitted for consideration. It is evident from the document that the vast majority of changes to the outline consent centre on the hospital design and its associated parameters plan enlarging the hospital parcel and reorienting and reconfiguring the main hospital block. While outline, it is clear that the refinement of the hospital building has served to create a more visually interesting built form than its predecessor with a strong diagonal emphasis that positively addresses the large expanse of public realm that demarcates the main entrance and create the civic heart of the development. Modest changes to the orientation and set back of two residential blocks serve to reinforce the importance of this space to create a coherent whole and consequently successfully accommodate the tabled changes to the hospital. The revised scheme retains its design rationale to maintain critical mass to the centre of the site dissolving to a more suburban typology as the residential units radiate outwards and again successfully mediates with the low density suburban edge and the consolidated bulk of the hospital campus.

6.4.4 The road network remains unchanged and adds to the legibility of the development as a whole. Minor changes to the proposed entrance plaza adjacent to the Clock Tower, seeks to create a safer pedestrian environment and segregate more sensitive pedestrian movements from the main access to the site, is considered to be a more logical in approach that the previous shared space iteration.

6.4.5 Mindful of the considerations and concerns raised through consultation and at planning committee, it is important for Members to note that there are no tabled changes to the parameters plans for either the residential or school sites and remain unchanged from the previously approved scheme. Further, the detailed design of the development will be dealt with under the reserved matters submission for each of the identified parcels. These applications will also be referred to planning committee for deliberation.

6.5 Impact of Neighbouring Properties

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

6.5.2 The nature of the tabled changes are such that they are concentrated to the centre of the site and consequently away from any sensitive receptors notably to Shooters Road, Comreddy Close, Albuhera Close and Spring Court Road.

In this regard, it is considered that the changes will have no discernible increase in impact to these properties in excess of those already agreed as part of the parent application and its stated parameters. It is acknowledged that the maximum height of the energy centre and expansion space to the north east of the site has increased as a result of this application, however, the newly stated parameters would not serve to increase the height over the existing height of the maternity unit and hence again will have no greater an impact than levels currently experienced. The changes, therefore, are considered to be acceptable and consistent with previous deliberations.

6.6 Highway Safety

Proposal

6.6.1 As part of the submission, it is clear that the road network, parking provision and decant strategy for the redevelopment of the site remain unchanged from the previously approved scheme. For clarity, the development proposes:

- The main access at The Ridgeway is proposed to be enhanced, including provision for right-turning (inbound) movements.
- Hospital parking is proposed to be reduced to 900 from the current 1,444 across the site, involving the extension of the existing multi-storey car park to the north-west of the site.
- School parking is proposed at 35-40 spaces.
- Residential parking is proposed at a ratio of 1:1.
- New pedestrian crossing to Lavender Hill.
- Interim and permanent school access via Hunters Way with one way exit via Shooters Road including provision of new connecting road and control measures.

6.6.2 In consultation with Transport for London and the Council's Traffic and Transportation team, no objections have been raised to the scheme on the basis that the tabled changes are so minor as to not materially impact upon transport implication for the scheme. All relevant considerations remain consistent with the previously approved scheme and all relevant measures secured by way of condition, s106 or s278 will be reiterated if Members resolve to grant consent.

6.7 Sustainable Design and Construction

6.7.1 The sustainable design and construction credentials of the scheme remain unaltered as a result of the submitted changes and therefore remain consistent with the requirements of the Local Plan. All relevant measures secured by way of condition or s106 will be reiterated if members resolve to grant consent.

Trees

6.7.2 A site wide Tree Preservation Order under the parent scheme was never confirmed as a consequence of the outline planning permission granted for the site and instead tree specific Tree Protection Orders have been placed on individual specimens across the site. Consistent with comments under the parent application the Tree Officer has indicated that he has no objection in principle to the scheme, commenting that there are a number of significant

and good quality trees on the site that positively contribute individually or as groups to the amenity and character of the site (including the proposed school site).

- 6.7.3 The overwhelming majority of these trees have been sensibly retained where they will continue to contribute to the proposed development. The revised hospital configuration would not result in any additional loss of trees over what has already been agreed. However, the Tree Officer has requested additional information around the protection measures afforded to the larger Cedar tree located in front of the retained hospital building given the changes to the entrance plaza. His concerns have been relayed to the applicant and additional information including revised comments from the Tree Officer will be reported at the meeting.

6.8 *S106 Contributions*

- 6.8.1 A Deed of Variation to the Section 106 agreement will be required to align it with this s73 application. Other than this minor change all other provisions, schedules and Heads of Terms will remain unaltered.

6.9 *Community Infrastructure Levy*

- 6.9.1 The CIL Regulations 2010 (as amended) allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development. Since April 2012 the Mayor of London has been charging CIL in Enfield at the rate of £20 per sqm. The Council is progressing its own CIL but this is not expected to be introduced until spring 2016.
- 6.9.2 Given the phased nature of the development and the intention to discharge reserved matters on a phase by phase basis, CIL will be calculated and paid on a phase by phase basis.

6.10 *Other Matters*

Equalities Impact Assessment

- 6.10.1 An Equalities Impact Assessment was been submitted as part of the parent outline application. The consultation process has served to notify all relevant adjoining parties likely to be impacted by the development. However, additional regard has been given to any potential impact upon the protected characteristics outlined by the Equalities Act 2010 Section 149 and the provisions contained therein. It is considered that due regard has been given to the impact of the scheme on all relevant groups with the protected characteristics schedule and given the comments made in the previous '*Inclusive Access*' section and on the basis of the wider social imperative of the development to deliver a modern hospital facility there would no undue impact upon any identified group. It is not considered that this would alter as part of the s73 application given the minor nature of the changes.

Enabling Works

- 6.10.2 As part of the current application, the Trust have requested that the Local Planning Authority consider the enabling works described in the proposal section of this report as a non-material amendment and consequently that such works would not constitute commencement of development for the hospital parcel for the purposes of discharge of conditions and s106 obligations. Whether or not a proposed amendment is non-material will depend on the circumstances of the case – a change which may be non-material in one case could be material in another. There is no statutory definition of non-material, but the LPA must be satisfied that the amendment sought is non-material in order to grant an application.
- 6.10.3 It is recognised that enabling works (including amongst others demolition and excavation) typically constitute development and consequently are regarded as operations that constitute commencement of works. However, it is also recognised that the Trust are subject to a challenging timetable for delivery of the hospital and that any delays can result in considerably increased financial burden and risk which may consequently undermine delivery. The Local Planning Authority in its resolution to grant consent under ref: 14/04574/OUT recognised the wider social imperative in facilitating the delivery of a new hospital to the borough. Substantial weight was afforded to such delivery in deliberations particularly in consideration of wider enabling development. In tabling the enabling works, the Trust have accepted any and all associated risks in proceeding with the works without first gaining approval of the Reserved Matters scheme and the possible delays that may incur if an agreement on the Reserved Matters scheme cannot be reached.
- 6.10.4 To this end, a positive decision to allow the works described to commence would not prejudice the decision making ability of the Local Planning Authority under any of the Reserved Matters applications nor would it discharge the responsibilities of the Trust to discharge relevant conditions and s106 obligations already agreed. In this regard, the enabling works would proceed entirely at the risk of the Trust should agreement on relevant Reserved Matters or conditions applications not be reached. Furthermore, weighting must again be applied to the wider social imperative to deliver a fit-for-purpose hospital within challenging timeframes and budgetary constraints for the Trust. Hence a decision to allow enabling works to include the tabled reduced level dig would assist in facilitating delivery of the hospital in a timely manner and Officers are satisfied that the described works can proceed in advance of the discharge of conditions.

7. Conclusion

- 7.1 Chase Farm is a strategically important site for the Borough and its surround. The tabled changes are considered to be minor in nature and as the quantum of development would remain unchanged, it is considered that the alterations can be agreed as a minor material amendment subject to all relevant conditions and s106 obligation previously secured under ref: 14/04574/OUT.

8. Recommendation

- 8.1 That planning permission be to be granted in accordance subject to all conditions levied under ref: 14/04574/OUT and a Deed of Variation to the agreed s106.

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NORTH

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LEGEND
 ① NEW HOSPITAL
 ② EXISTING INFIRMARY
 ③ EXISTING HEALTH STOREY CAR PARK
 ④ MULTI-STORY CAR PARK EXTENSION
 ⑤ ENERGY CENTRE
 ⑥ MEDICAL GAS COMPOUND
 ⑦ FUTURE LONG TERM EXPANSION
 ⑧ SCHOOL SITE
 ⑨ ELDER TOWER

IBI

IHP

CHASE FARM REDEVELOPMENT

Architects: Site Plan With Schools

Drawing No: 5/198
 Date: 26/07/2015
 Scale: 1:11000
 Project: CHASE FARM REDEVELOPMENT
 SECTION 7.3 SUBMISSION

Drawing Author: IBI

IBI NS-XX-PL-100-011

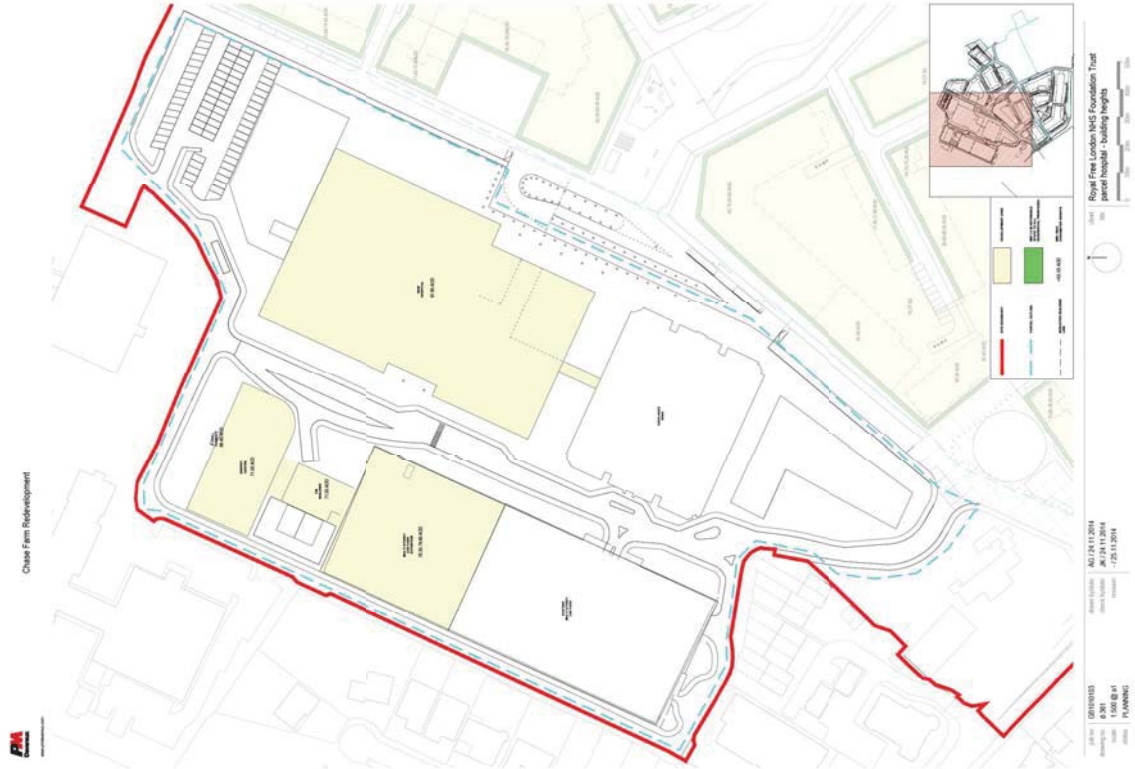


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Drawing Title: SECTION 73 AREAS OF CHANGE			Date: 28/08/15 Scale(s): NTS
Drawing Number: 50198			Status: PLANNING Purpose: SECTION 73 SUBMISSION
Drawing Number: S 73_SKETCH-12			Revision: _____



With Revised Parameters
 (Drawing Number: IBI-WS-XX-PL-100-018)

PARCEL ZONE HOSPITAL BUILDING HEIGHTS



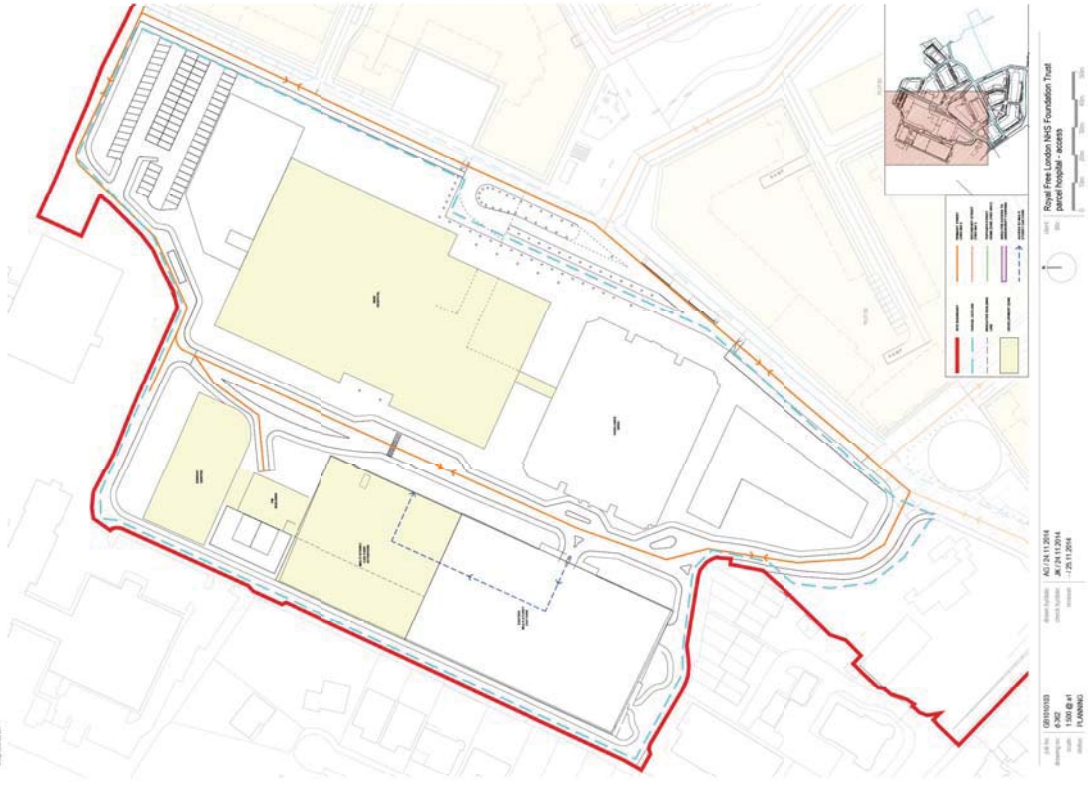
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Drawing Title: SECTION 73 AREAS OF CHANGE	Drawing Number: 50198 Date: 28/08/15 Status: PLANNING Purpose: SECTION 73 SUBMISSION Drawing Number: S 73_SKETCH-13



With Revised Parameters
 (Drawing Number: IBI-WS-XX-PL-100-019)

PARCEL ZONE HOSPITAL ACCESS



With Original Parameters
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ARCHITECTS

Project: CHASE FARM REDEVELOPMENT

Drawing Title: SECTION 73 AREAS OF CHANGE

JOB Number	Date	Scale/pts
50198	28/08/15	NTS
Status	Purpose	
PLANNING	SECTION 73 SUBMISSION	
Drawing Number	Revision	
S 73_SKETCH-6		



With Revised Parameters
 (Drawing Number: IBI-WS-XX-PL-100-012)



With Original Parameters
 (Drawing Number: D-320)

PARCEL ZONE B2 - AREAS

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IBI Group **Nightingale**

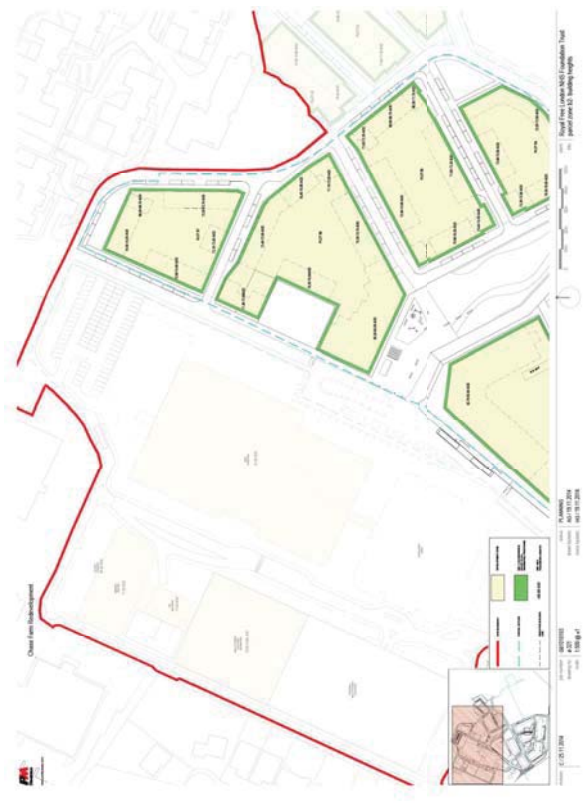
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Drawing Title: SECTION 73 AREAS OF CHANGE

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Status	Purpose	
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Drawing Number	Revision	
S 73_SKETCH-7		



With Revised Parameters
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With Original Parameters
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PARCEL ZONE B2 - BUILDING HEIGHTS

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Nightingale
Project
CHASE FARM REDEVELOPMENT

Drawings Title
SECTION 73
AREAS OF CHANGE

JOB Number
50198

Date
28/08/15

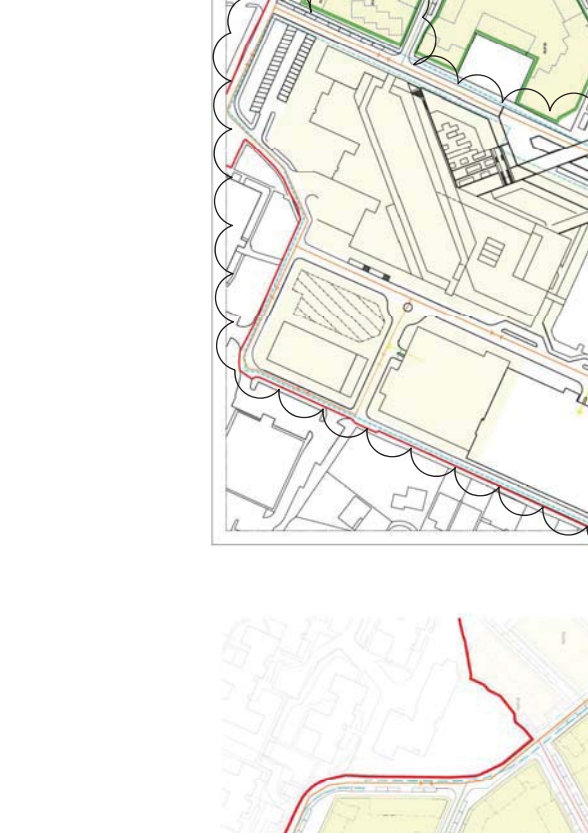
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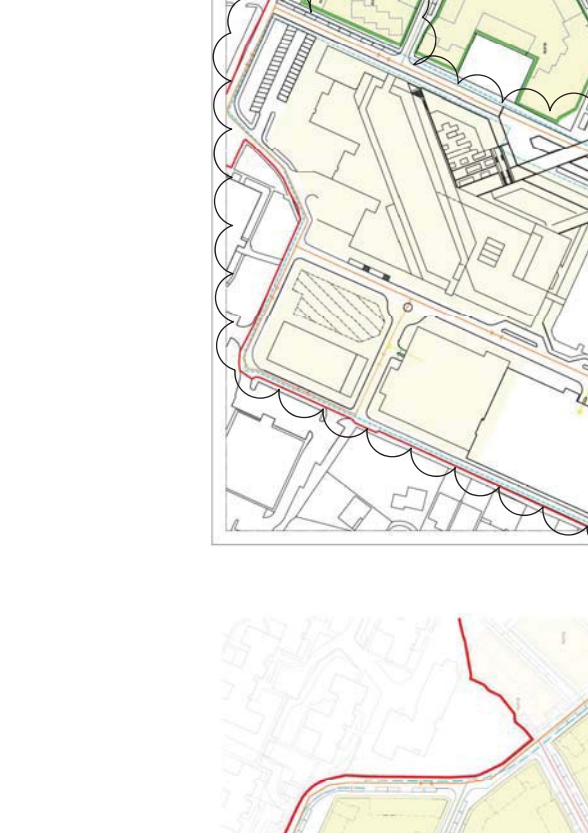
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Drawing Number
S 73_SKETCH-8

Revision



With Original Parameters
(Drawing Number: D-322)



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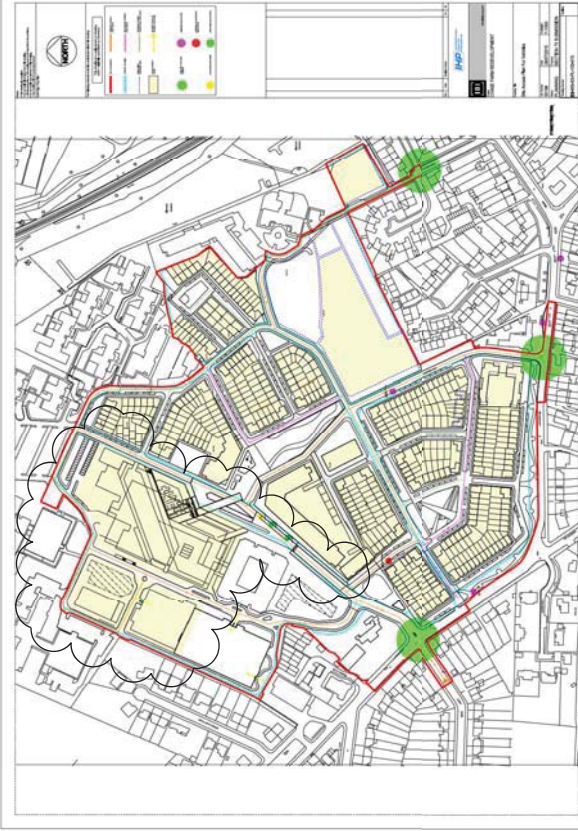
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Drawing Number	Revision	
S 73_SKETCH-9		



With Revised Parameters
 (Drawing Number: IBI-WS-XX-PL-100-015)



With Original Parameters
 (Drawing Number: D-351)

ACCESS PLAN FOR VEHICLES

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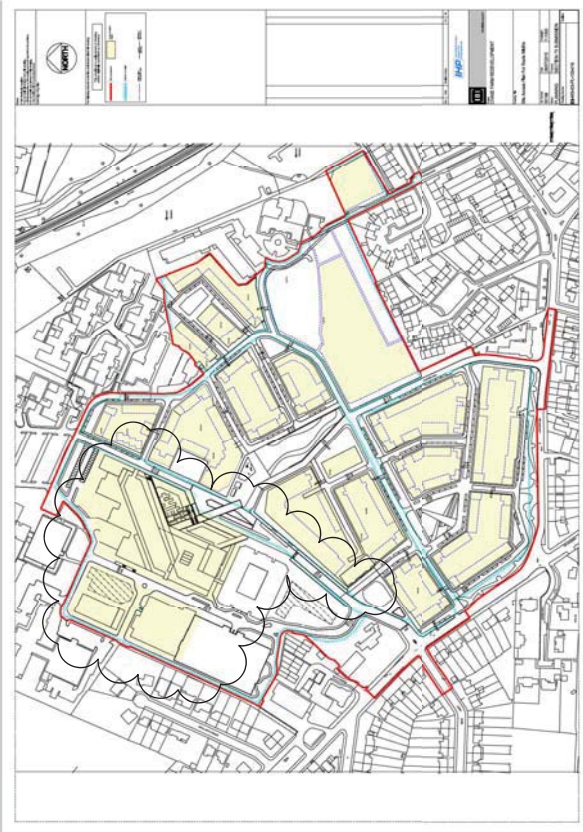
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Project: CHASE FARM REDEVELOPMENT

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S_73_SKETCH-10		



With Revised Parameters
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With Original Parameters
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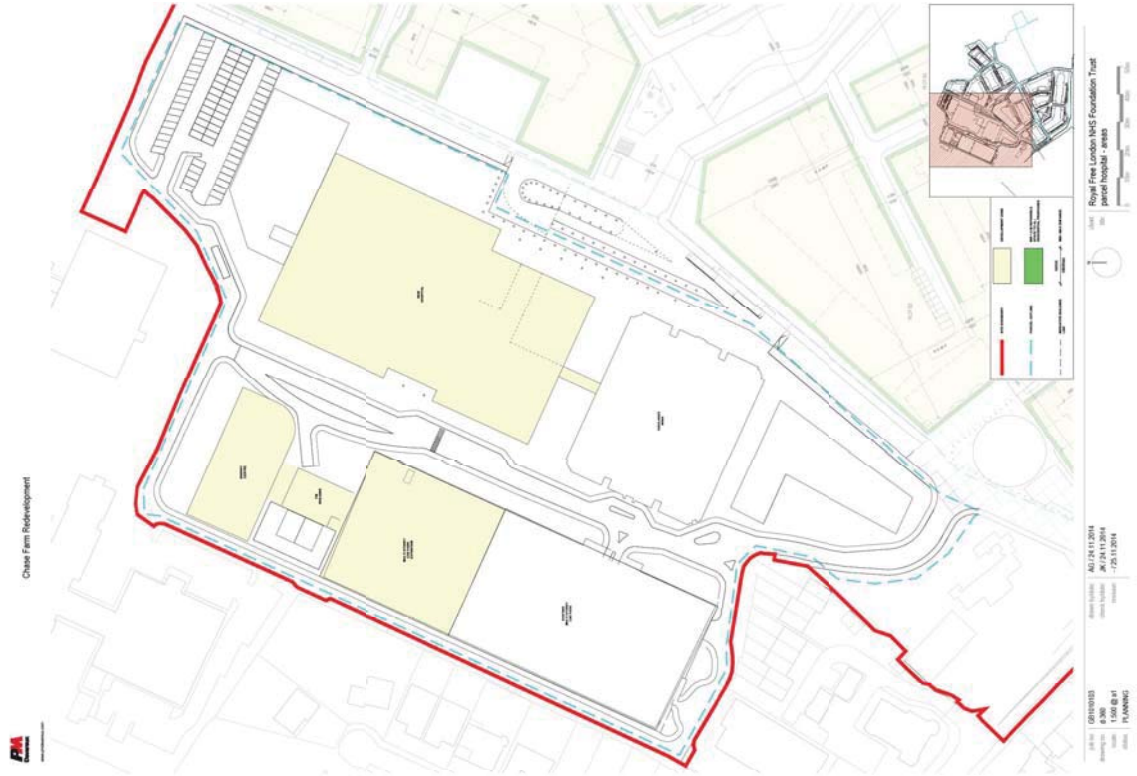
ACCESS PLAN FOR ROUTE WIDTHS

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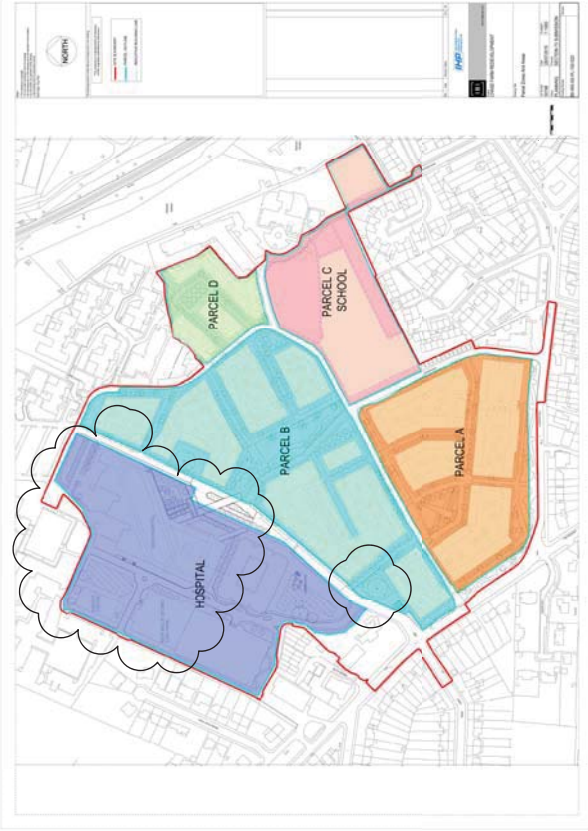
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PARCEL ZONE HOSPITAL AREAS

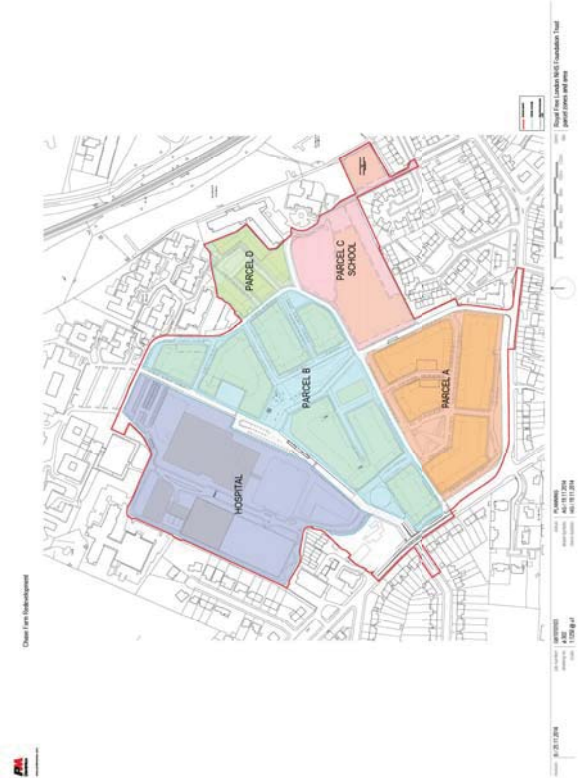


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Drawing Number: S_73_SKETCH-14	Section: SECTION 73 SUBMISSION
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PARCEL ZONES AND AREAS

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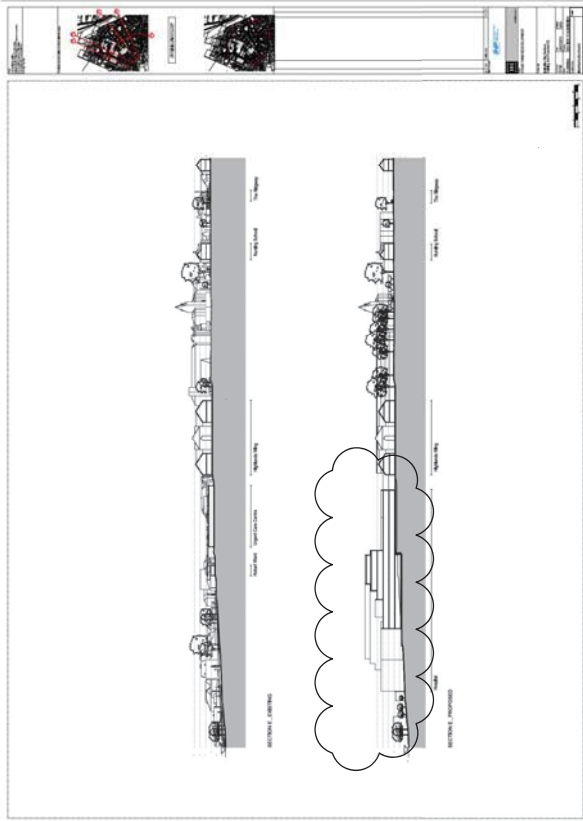
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Project: CHASE FARM REDEVELOPMENT

Drawing Title: SECTION 73 AREAS OF CHANGE

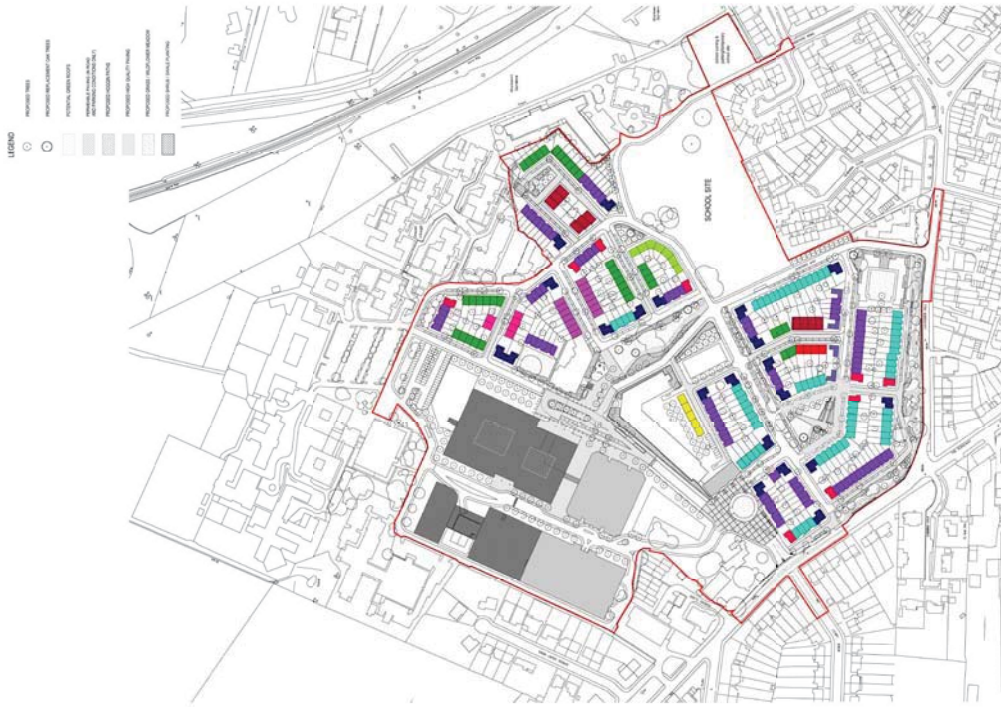
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Drawing Number	Revision	
S 73_SKETCH-2		



With Original Parameters
 (Drawing Number: D-017)

With Revised Parameters
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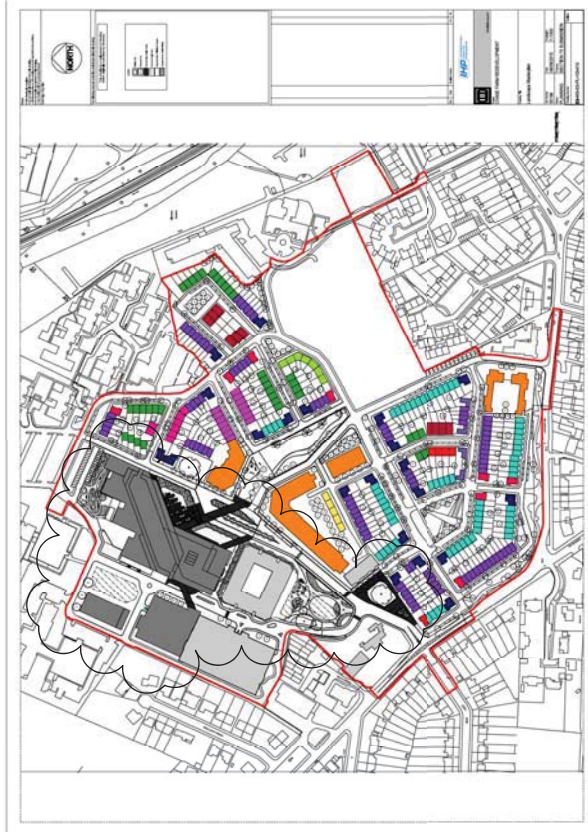
INDICATIVE SITE SECTIONS EXISTING AND PROPOSED EE



Sheet Number: D-901
 Drawing Title: CHASE FARM REDEVELOPMENT
 Date: 11/08/15
 Scale: 1:1000
 Project: CHASE FARM REDEVELOPMENT

With Original Parameters
 (Drawing Number: D-901)

LANDSCAPE MASTERPLAN



With Revised Parameters
 (Drawing Number: IB1-WS-XX-PL-100-010)

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Drawing Title:	SECTION 73 AREAS OF CHANGE
DSC Number:	50198
Date:	28/08/15
Scale/Stage:	NTS
Status:	PLANNING
Purpose:	SECTION 73 SUBMISSION
Drawing Number:	S 73_SKETCH-4
Revision:	



Chase Farm Redevelopment

- KEY
- ① new layout
- ② existing layout
- ③ new street or path
- ④ existing structure
- ⑤ existing layout
- ⑥ existing site
- ⑦ existing layout & existing structure (not to scale)
- ⑧ not shown



Date: 15/01/2014
 Drawn: [Name]
 Scale: 1:2000
 Title: CHASE FARM REDEVELOPMENT PLANNING

With Original Parameters
(Drawing Number: D-047)

ILLUSTRATIVE SITE PLAN WITH SCHOOL



With Revised Parameters
(Drawing Number: IB1-WS-XX-PL-100-011)

- NOTES:**
- This drawing is complete.
 - Do not scale dimensions from this drawing.
 - All dimensions on this drawing are to be reported to the architect.
 - Do not modify any dimensions of this drawing.
 - Do not modify any dimensions of this drawing.

The following general notes apply to all drawings within this drawing:

Rev: _____ Date: _____ Revision Notes:

IB1 Nightingale	
Project: CHASE FARM REDEVELOPMENT	
Drawings Title:	SECTION 73 AREAS OF CHANGE
DSC Number:	50198
Date:	28/08/15
Scale/Stage:	NTS
Status:	PLANNING
Purpose:	SECTION 73 SUBMISSION
Drawing Number:	S 73_SKETCH-5
Revision:	