

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 8th November 2016

Report of
Assistant Director - Planning,
Highways & Transportation

Contact Officer:
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Ward:
Cockfosters

Application Number : 16/01578/FUL

Category: Major Large Scale -
Dwellings

LOCATION: New Avenue Estate, Including Shepcot House, Beardow Grove, Coverack Close, Oakwood Lodge, Garages To The Rear Of The Lousada Lodge, Hood Avenue Open Space And Cowper Gardens Open Space, London, N14.

PROPOSAL: Demolition of Shepcot House, Oakwood Lodge, Beardow Grove, Coverack Close and garages rear of Lousada Lodge and phased redevelopment of site involving construction of new road to provide 408 residential units comprising 239 flats and maisonettes (109 x 1-bed, 116 x 2-bed, 14 x 3-bed) and 173 houses (85 x 2-bed, 74 x 3-bed, 14 x 4-bed) within a mix of 2, 3, 4, 5, 6 and 9-storey buildings, erection of a nursery and community building (Class D1), construction of an energy centre, formation of play space including play area at Cowper Gardens open space and provision of 330 surface and undercroft car parking spaces.

Applicant Name & Address:
Countryside Properties (UK) Ltd
C/O AGENT
United Kingdom

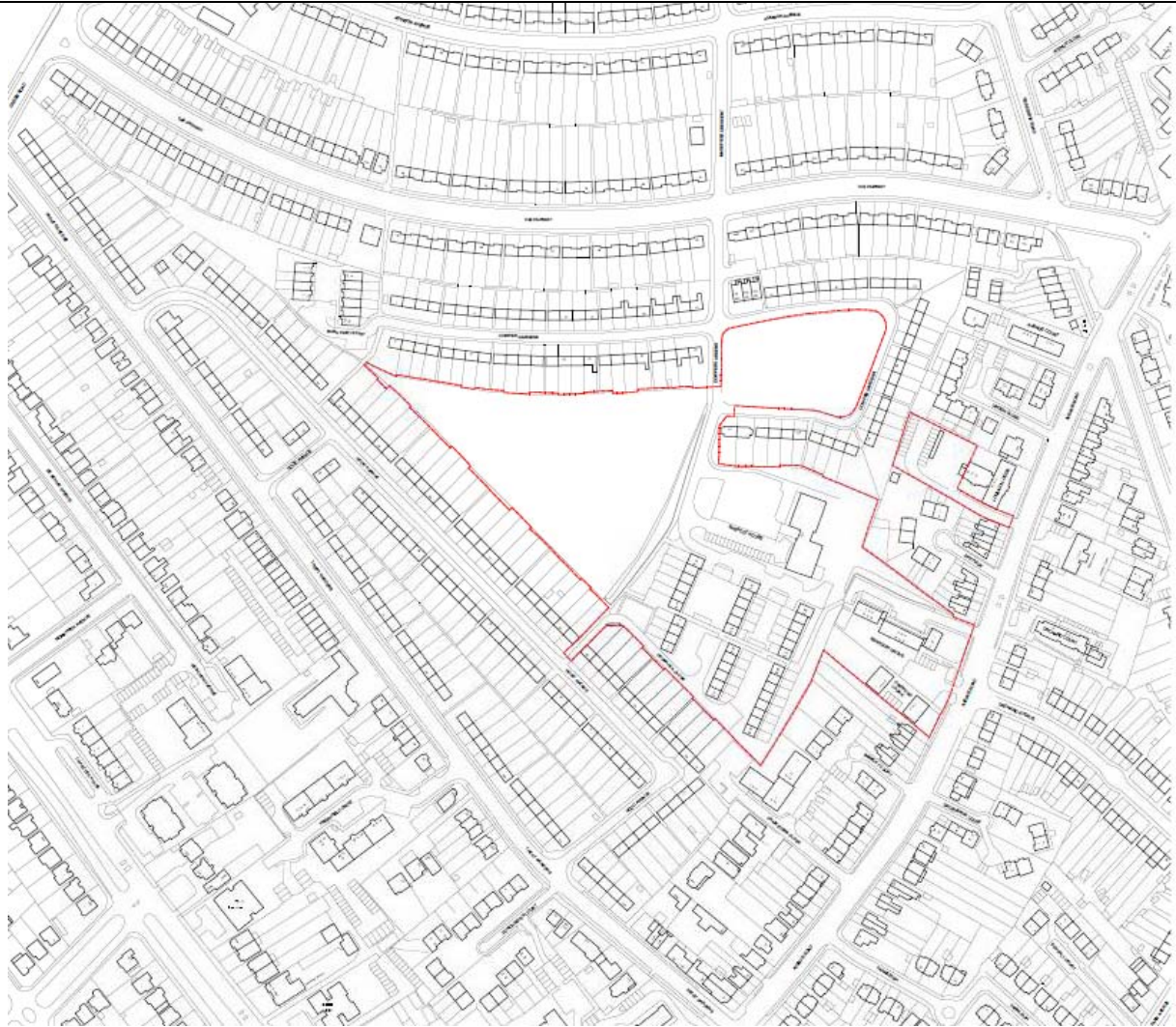
Agent Name & Address:
Mr SAMUEL STACKHOUSE
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W1J 8BA
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RECOMMENDATION:

That following referral to the Mayor of London and no objections being raised, and the securing of a Legal Agreement to secure the obligations as set out above, planning permission be **GRANTED** subject to conditions.

That officers be granted delegated authority to finalise the precise wording of conditions to cover the issues identified within the report and summarised below:

Ref: 16/01578/FUL **LOCATION:** New Avenue Estate, N14



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North



1. Site and Surroundings

- 1.1. The estate is bounded by residential properties fronting Cowper Gardens to the north, Avenue Road to the east and Hood Avenue to the south. Within the “redline area” the estate consists of:
 - Hood Avenue Open Space;
 - Cowper Gardens Open Space
 - Shepcot House, an 11 storey concrete panelled building with 72 flats and a (unauthorised) nursery on the ground floor;
 - Coverack Close, which comprises of 6 four-storey concrete panelled buildings over garage spaces, with 72 stacked maisonettes;
 - Beardow Grove, comprising of 3 four-storey interlinked masonry buildings with 19 stacked maisonettes;
 - Oakwood Lodges (2-storeys); and
 - The rear garage court at Lousada Lodge.
- 1.2. There are some significant constraints associated with the site, including considerable changes in ground levels from east to west and from north to south. In addition, there is a culvert which runs from the western end of the site, beneath the Hood Avenue Open Space and out to Avenue Road. There is also a public right of way running north to south from Hood Avenue to Cowper Gardens
- 1.3. The site is located in an area of poor public transport accessibility (PTAL), with a PTAL score ranging from 1a to 2 (1 being very poor and 6 being excellent). Oakwood Station is approximately 1.1km distant from Coverack Close and Southgate Station is approximately 1.5km distant, and both are served by the Piccadilly Line. A single bus service runs along Avenue Road (299) although there are additional bus services along Chase Side and Chase Road.
- 1.4. Surrounding the site are traditional inter-war dwellings comprising primarily of semi-detached and terraced dwellings. The majority being two-storey, some with rooms within the roof space.

2. Proposal

- 2.1. Permission is sought for the redevelopment of the site involving the demolition of Shepcot House, Oakwood Lodge, Beardow Grove, Coverack Close and garages rear of Lousada Lodge and phased redevelopment of site involving construction of new road to provide 408 residential units, erection of a nursery and community building (Class D1), construction of an energy centre, formation of play space including play area at Cowper Gardens open space and provision of 330 surface and undercroft car parking spaces.
- 2.2. Since the submission of the application, the development has been amended to remove the fourth floor of the building proposed for Lousada Lodge (Building “K1”), resulting in the provision of up to 12 flats (6 x 1-bed, 6 x 2-bed) within a three storey building, as opposed to 10 stacked maisonettes (5 x 3b5p, 4 x 2b4p, 1 x 2b3p). In addition, the mews houses (Block “C1”) have been removed from the scheme due to concerns over the massing of 2-storey buildings on the boundary of neighbouring gardens and the resulting impact on amenity and existing third party trees.

- 2.3. An existing bus stop on the western side of Avenue Road will need to be relocated to accommodate the new access from Avenue Road.

3. Relevant Planning Decisions

- 3.1. None relevant.

4. Consultations

4.1. Statutory and non-statutory consultees

Economic Development

- 4.1.1. It has been advised that an employment and skills strategy will be required, in accordance with the s106 SPD.

Environmental Health

- 4.1.2. It has been advised that there are no objections because there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality. Conditions are however proposed to address: contamination; a mechanical ventilation strategy for the blocks facing Avenue Road; an acoustic report to deal with any proposed plant; and a construction management plan.

Public Housing, Health, Adult Social Care

- 4.1.3. It has been advised that the developer should consider the following:

- sustainable energy (what is an 'energy centre?')
- building to maximize social interaction between residents
- promoting walking and cycling through accommodation and how buildings are laid out. This will include wind tunneling effects, sunlight and
- how buildings interact with the street.
- play space needs to be overlooked by residents. Assumption should be that kids will be able to play in street.
- each residency to have direct sight of green scenery
- traffic coming onto the estate needs to be slowed right down
- the site needs to have a number of pedestrian exit routes so its easier to get to local amenities walking than by car
- similarly, first thing that people see when they leave their house should not be the car / car park
- what is the effect going to be on surrounding area

SuDS Officer

- 4.1.4. It has been advised that whilst the surface drainage scheme is acceptable, the details of each of the elements will need to be conditioned. Although limited infiltration is expected, lined permeable paving is discouraged so infiltration can be maximised.

Traffic and Transportation

- 4.1.5. Whilst not objecting to the principle of re-development, concerns have been raised with respect to: insufficient on-site parking provision; the use of Cowper Gardens

Open Space for parking; excessive road / path gradients; the lack of an on-board car club operator; servicing.

Tree Officer

4.1.6. Although it is advised that there is no in principle objection, the following comments are made:

- The close proximity of Blocks E1/E2 to third-party Oak trees (protected by a TPO) in the rear gardens of 5 to 8 Speyside will bring undue pressure to excessively prune.
- There are two mature ash trees south of 99-117 Cowper Gardens of good quality and significant amenity value located in a large raised grass verge directly where block E3 is proposed.
- The trees will have to be removed to develop this area and I object to their removal being that they are trees of high quality and amenity value in an easily defensible area and that provide significant screening for the adjacent residential properties. Their removal is contrary to DMD 80.
- The proposed landscape plan looks good quality and will mitigate the majority of trees removed for development.
- It is recommended to condition a Tree Protection Plan, in accordance with BS5837:2012, to ensure the protection of trees on adjacent land from development activities.
- A detailed landscaping scheme including tree planting should be submitted via condition prior to development.

Metropolitan Police Service

4.1.7. It has been recommended that the development adopts the principles and practices of 'Secured by Design' and the physical security requirements detailed within the current Secured by Design Homes guide and Multi Storey Dwellings.

Greater London Authority

4.1.8. Consultation with the Mayor's Office is a two stage process. The following comments have been received in response to the stage one consultation:

- Whilst the principle of the redevelopment of the New Avenue Estate is strongly supported, the Mayor considers that the application does not yet comply with the London Plan for the following reasons:

Housing

- The development proposal will result in an increase in affordable housing (33.3% by habitable room) in line with the London Plan however it is not yet possible to determine whether this represents the maximum reasonable amount in accordance with London Plan policy 3.12.
- GLA officers will need to review the Council's appraisal of the applicant's viability before the scheme is referred back at Stage 2.
- Further information on the tenure split should be provided and the Council should confirm that the affordable offer, tenures, rent levels and mix meet local needs.
- Building Regulations M4(2) and M4(3) should be secured by condition.
- A contribution to improve the accessibility and quality of off-site play provision if necessary.

Community Facility

- A condition should be secured to ensure that the community facilities are fitted out to meet the needs of the end user.

Urban Design

- The applicant should demonstrate that the scheme in its context does not impact on local views.
- The final choice of material and quality of detailing will have a significant impact, therefore there should be a clause in the s106 agreement to ensure that the same architects or architects of equal quality are used to produce all construction drawings or a budget is allowed to allow them to review these when they get produced.

Climate Change

- The site contains a significant area of surface area flood risk and suitable conditions should be applied to ensure the sustainable management of water and minimise the potential for surface water flooding.
- Carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

Transport

- TfL is satisfied with the proposed provision of parking spaces across the site and discourages any increase in parking levels.
- Appropriate conditions should be secured to ensure that the proposal complies with London Plan transport policy.

London Fire Brigade

- 4.1.9. It has been advised that the Brigade is satisfied with the proposals because access to the whole site appears adequate. It is also recommended that sprinklers are considered.

Thames Water

- 4.1.10. The following comments have been received:

- No objections are raised with regards to sewerage infrastructure capacity.
- Thames Water approval is required for works within 3m of a public sewer.
- Petrol / oil interceptors should be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
- The developer should demonstrate the measures to be undertaken to minimise groundwater discharge into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. A Groundwater Risk Management Permit will be required.
- The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. An impact study of the existing water supply infrastructure will need to be secured by condition.

Design Council

4.1.11. The following comments were received

- The circulation of the current master plan works well, as does the layout of streets and route hierarchy.
- Overall placing of buildings is legible, with good access across the site.
- Landscaping and swales particularly along the main avenue are positive design elements.
- In its current arrangement, the development appears too dense at its centre with the tall apartment blocks generating an uncomfortable transition in height with the adjacent terraced houses.
- Question the need for a 10-storey building.
- Although the flats work internally and in terms of orientation, rearranging building typologies around the centre could help resolve the incongruity between flats blocks and houses.
- There is little differentiation between the carriageway and street parking spaces.
- There is no design strategy to prevent residents or visitors from parking in the roadway.
- The widths of the streets appear too wide in comparison to the main avenue. More tree planting and other traffic calming methods could be used to reduce speed.
- The master plan must clearly indicate the number of parking spaces, both in garages and those on the street. This is important to the significant uplift in the number of cars and residents.
- A good deal of thought has been incorporated into the character of the public spaces.
- The wall for Avenue Gardens does not allow for the necessary plantings to create a bio-diverse, marshy area that would complement the swales and landscaping.
- The small body of water in Avenue Gardens could present a hazard for children.
- There is concern regarding the retention of existing foliage, particularly large trees around the perimeter of the site, which should be retained wherever possible.
- The triangular space beyond Avenue Gardens should also be overlooked and made secure given its isolated location.
- The nursery / community centre incorporates level changes well.
- The facility is too small to work and the layout should be re-considered to enable a community use at the same time as the nursery is operating.

4.1.12. Any further comments received will be reported at Committee.

Public Response

4.1.13. Letters were sent to the occupiers of 1002 neighbouring and nearby properties in addition to site and press publicity. As a result, 45 letters, inclusive of one from the Southgate District Civic Trust, have been received raising some or all of the following points:

Impact on character of the area

- The development is covering an area that can certainly be improved.

- A mixed development of houses and flats sounds like an opportunity to create a new estate that can deliver a very good and open environment for families in a very central position of Southgate.
- There will be 239 flats and maisonettes and 173 houses, with 330 garages surface and undercroft. As it is proposed at present this means there will be more blocks of flats than the group would like to see on a new estate, when there is an opportunity to provide more family houses.
- Lousada Lodge building will be a huge structure built in too small an area.
- Lousada Lodge building bears no resemblance to Lousada Lodge or to the houses around it, therefore standing out like a sore thumb / out of keeping / out of scale.
- A bungalow or two would be more appropriate than the building proposed for the Lousada Lodge site.
- Lousada Lodge building should be no higher than the existing block.
- The proposal will swallow up green space.
- Lousada Lodge building larger than lead to believe.
- An average of 20sqm of public amenity space per unit sounds reasonable, but it is to be distributed between the houses, flats, and open spaces

Impact on amenity

- Flats planned for Lousada Lodge appear too high. They look as if they will block out the light in the adjoining gardens. This already occurs if the adjoining hedge is allowed to grow too high.
- Overlooking and loss of privacy to surrounding properties from the Lousada Lodge building.
- It is evident that our garden (No.79 Avenue Road) will be overlooked by a large number of windows which are going to be around half the distance away of the existing windows
- Increased noise from Lousada Lodge development.
- Increased pollution from more vehicles.
- Daylight assessment only appears to do a sunlight projection at midday.
- Construction noise will make living in the area unbearable.
- The incomplete and inaccurate "Daylight and Sunlight Assessment" which has excluded the window in our property which will be most severely impacted as well as a glass paned back door (79 Avenue Road).
- No assessment of overshadowing of garden of 79 Avenue Road.
- Plans do not show relationship of the new buildings to the existing buildings.
- The existing distance from our property to the nearest building is 15 metres – this is going to be reduced to 5.5 metres. This means that the new buildings will be around 6 feet from our garden fence rather than the 30+ feet at present. This represents a major change which will only negatively impact the aspect (and value) of our property.
- With the excessive height of the new building, this can only serve to totally obstruct everything that we can currently view from the windows of our property – sky, trees, daylight – and replace it with a brick wall. This is worsened by the fact that the lowest point of the roof of the new building is higher than the top of the chimney stack on our property, as seen in Drawing Number ENF-CCE_A_DR_0133 Rev B (Proposed Site Elevations 4/4).
- There may also be increased noise as a large number of residents will have access the small green space behind the new blocks F2. This is a severe and unacceptable encroachment on our personal privacy and liberty.

- The comments on our loss of daylight simply reinforce the fact that we are going to be severely and unacceptably impacted. This is the Council's own data, they have failed their own daylight impact assessments and yet they have done nothing to improve the situation.
- It is still unclear as to what will happen with the differing ground levels alongside our property. We are unable to ascertain from any of the plans as to how this will be addressed. If the ground level is raised, this will increase the negative impacts.

Highways matters

- Loss of parking.
- Inadequate parking provision.
- Increased traffic.
- When cars turn out of the side road beside Lousada Lodge onto Avenue Road it is very dangerous because visibility is so poor (partly because of parked cars) and because cars accelerate down the Avenue Road incline.
- There is already an overspill from the development occurring at the top of Avenue Road/Chase Rd. Avenue Road often has crashes. Increasing traffic load will increase the risk of a fatality.
- Rubbish - it sometimes doesn't get collected because the rubbish cart is unable to pass down that Lousada side road. It's very unhygienic and smelly back there. The risk of non-collection will probably increase (not to mention the volume of rubbish will increase)
- Complete loss of access to garage at rear of property (Hood Avenue).
- Lack of consideration of the impact on traffic in the neighbourhood with so many new residences being built.
- Avenue Road does not at present provide an access route to the estate, only to Beardow Grove. The main access to the estate will be off Avenue Road resulting in a high level of traffic impact.
- A realistic traffic impact assessment must be carried out as Avenue Road is extremely busy, especially during rush hour.
- No action to widen the access to Cowper Gardens from The Fairway. Whilst Cowper Gardens is a 2-way road, due to parking, this is reduced to 1 lane, causing congestion into / out of the road.

Any other matters raised

- Affect local ecology.
- Effect on property values, particularly where existing amenity is harmed.
- Site plan does not show what will clearly happen to the hedge separating the gardens of Block K (Lousada Lodge) from the gardens of Linden Close. For years this hedge has been a haven for wildlife - birds, hedgehogs, squirrels and slow worms (a protected species). This hedge has been a source of enjoyment for residents of all the houses surrounding Lousada Lodge and it would be a great loss to our community if it was removed.
- More open space needed on development site.
- Strain on existing community facilities.
- This proposal will destroy the residents' standard of living and appears once again to be based on greed and no consideration for existing home owners.
- The lack of detail shown on all drawing and plans with regard to our property (79 Avenue Road) which is an immediate neighbour to the development.

- Lack of compensation for immediate neighbours despite compensation being paid to Council tenants.
- Lack of any detailed timetable for the demolition and construction.
- Minimal information provide on the demolition and construction phases. No mention of how the impact will be minimised for immediate neighbours or compensation for those affected.
- As the redevelopment of Lousada Lodge garages is on a completely separate plot from the rest of the development, I do not understand why it is necessary to develop here as well. It will put extreme strain on the infrastructure in the area via two extremely close pinch points.
- Plans seem to indicate that part of the boundary towards the front of my property (97 Avenue Road) has been narrowed confirmed from the boundary plans for my property from land registry.
- A greater burden on local hospitals.
- No provision for additional school children.
- Proposed play area may result in anti-social behaviour.
- It is extremely disappointing to note that, despite our lengthy list of objections and questions (No.79 Avenue Road), the only response that we have received is some comments on our loss of daylight, highlighted the fact that the plans were drawn up using a different property on Avenue Road as a comparison.
- Lack of engagement on the part of the Council.

5. Relevant Policy

5.1. The London Plan

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 3.8	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
Policy 3.13	Affordable housing thresholds
Policy 3.14	Existing housing
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 5.8	Innovative energy technologies
Policy 5.9	Overheating and cooling
Policy 5.10	Urban greening
Policy 5.11	Green roofs and development site environs
Policy 5.13	Sustainable drainage
Policy 5.14	Water quality and wastewater infrastructure
Policy 6.3	Assessing the effects of development on transport capacity
Policy 6.9	Cycling
Policy 6.12	Road network capacity
Policy 6.13	Parking
Policy 7.1	Lifetime neighbourhoods

Policy 7.2	An inclusive environment
Policy 7.3	Designing out crime
Policy 7.4	Local character
Policy 7.6	Architecture
Policy 7.7	Location and design of tall and large buildings
Policy 7.14	Improving air quality
Policy 7.15	Reducing noise and enhancing soundscapes
Policy 7.18	Protecting open space and addressing deficiency
Policy 7.19	Biodiversity and access to nature

5.2. Core Strategy

CP2:	Housing supply and locations for new homes
CP3:	Affordable housing
CP4:	Housing quality
CP5:	Housing types
CP9:	Supporting community cohesion
CP13:	Promoting economic prosperity
CP16:	Taking part in economic success and improving skills
CP18:	Delivering shopping provision across Enfield
CP20:	Sustainable energy use and energy infrastructure
CP21:	Delivering sustainable water supply, drainage and sewerage infrastructure
CP22:	Delivering sustainable waste management
CP24:	The road network
CP25:	Pedestrians and cyclists
CP26:	Public transport
CP28:	Managing flood risk through development
CP30:	Maintaining and improving the quality of the built and open environment
CP31:	Built and landscape heritage
CP32:	Pollution
CP36:	Biodiversity
CP46:	Infrastructure contributions

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
DMD37	Achieving High Quality Design-Led Development
DMD38	Design Process
DMD43	Tall Buildings
DMD44	Preserving and Enhancing Heritage Assets
DMD45	Parking Standards
DMD47	New Roads, Access and Servicing
DMD48	Transport Assessments
DMD49	Sustainable Design and Construction Statements
DMD50	Environmental Assessment Methods
DMD51	Energy Efficiency Standards
DMD53	Low and Zero Carbon Technology
DMD54	Allowable Solutions
DMD55	Use of Roof Space / Vertical Surfaces

DMD56	Heating and Cooling
DMD57	Responsible Sourcing of Materials
DMD58	Water Efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD65	Air Quality
DMD68	Noise
DMD69	Light Pollution
DMD70	Water Quality
DMD72	Open Space Provision
DMD73	Children's Play Space
DMD78	Nature Conservation
DMD79	Ecological Enhancements
DMD81	Landscaping

5.4. Other Relevant Policy Considerations

National Planning Policy Framework
National Planning Practice Guidance
LBE S106 SPD
Community Infrastructure Levy Regulations 2010
Enfield Characterisation Study
Monitoring Report and Housing Trajectory 2015 (2016)
Technical Housing Standards – Nationally described space standards

6. **Analysis**

6.1. **Principle**

- 6.1.1. In broad terms, the proposal is consistent with the policies within the London Plan and the Core Strategy which seek to support development which contributes to the strategic housing needs of Greater London and the Borough.
- 6.1.2. However, the loss of Open Space is resisted unless replacement open space can be re-provided in the same locality and of better quality or it has been demonstrated that the open space in question is surplus to requirements. In addition, it is equally important that all other relevant planning considerations which seek to ensure that appropriate regard is given to loss of community facilities, design, the character of the area, neighbour amenity and residential amenity, traffic generation and highway safety and acceptability with regards to sustainability are given appropriate consideration.

6.2. **Development on Local Open Space**

- 6.2.1. The site contains approximately 17,000sqm of local open space, with 13,000sqm of this contained within the Hood Avenue Open Space. This area contains a MUGA and a play area located towards its eastern end. Cowper Gardens consists of amenity grassland interspersed with a few trees. Some residents park their vehicles around the periphery of the open space. London Plan policy 7.18, core policy 34 and DMD 71 all advise that development which results in the loss of open space will be resisted unless certain criteria are met.

Hood Avenue Open Space

- 6.2.2. A considerable portion of the Hood Avenue Open space will be built upon to accommodate Blocks C3, G1 to G3, H1 to H4 and J1 (the community centre / nursery) and the resulting streets / parking areas and private gardens. Cowper Gardens will be provided with play facilities for children (5-11 years) and some formalised visitor parking provided around the periphery.
- 6.2.3. The community engagement process undertaken by the developer highlighted two key issues with the existing Hood Avenue Open Space: being located on the top terrace it was not overlooked by residents of the estate; and it was prone to surface water flooding particularly in the western extremity. Two large but very different areas are being provided on the former Hood Avenue Open Space. A centrally located and sunken area (“Avenue Gardens”) will form the heart of this top terrace area. It will serve a dual role for community activity and will also serve to provide flood mitigation. Avenue gardens will be overlooked by each of the blocks on this top terrace. Details of the play space, equipment, management and hard / soft landscaping will be secured by condition. In addition, the wall has been re-designed to address the concern raised by the Design Council.
- 6.2.4. At the western end, mostly overlooked by Blocks G3 and H4 is the “Eco Garden”. Due to it being located on the part of the site particularly prone to surface flooding, the sunken garden will have a raised walkway and planted with various plant species. It has been advised that plants will include native and non-native varieties. It would be preferable that only native species are used, however in certain circumstances non-native species may be considered more appropriate but it would require the applicant to demonstrate why non-native species are being provided. Details of a landscaping strategy will be secured by condition.
- 6.2.5. With regard to the Eco Garden, it has been advised that due to this area not being as well overlooked as other parts of the site, access into the sunken garden will be on a controlled basis. Although this is acceptable in principle, details of the proposed management regime would need to be secured by condition.

Cowper Gardens Open Space

- 6.2.6. This area is included within the development site due to its close proximity to the main development area. As discussed above, this area comprises mostly of amenity grass and a few trees. The development proposal involves the provision of play facilities for 5 to 11 year olds, located towards the western end of the Open Space. The strategy for Cowper Gardens is a “light touch” approach and it is considered that this element of the proposal achieves this aim. Details of the play space, equipment, and hard / soft landscaping will be secured by condition.

Summary

- 6.2.7. Although there is a quantitative loss of open space, the development proposal shows that the resulting open space is well-detailed and indicates how individual areas of space would be used for different purposes, notably, play space for different age groups and ecology. On balance, the quantity of Open Space lost to the proposed development is outweighed by the quality of the Open Space provided, having regard to London Plan policy 7.18, CP34 of the Core Strategy, and DMD 71. Notwithstanding, details of the phasing of provision will need to be clarified so that the occupiers of the early phases of the development are provided with access to Open Space.

6.3. **Housing Need**

- 6.3.1. Section 6 of the NPPF (“Delivering a wide choice of high quality homes”) provides guidance on housing delivery and the quality and location of new houses. Paragraph 47 of the NPPF aims to “boost significantly the supply of housing” through the use of an evidence base and an annually updated supply of specific deliverable sites with a 5% buffer. Paragraph 48 confirms that local planning authorities should make allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available, although it is advised that this should not include residential gardens. Housing applications are to be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (para.49). Paragraph 53 advises that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.
- 6.3.2. The Core Strategy seeks to ensure new developments offer a range of housing sizes to meet housing need. In particular, it seeks to ensure that with regard to market housing, 45% are 3+bedroom houses and 20% is 4+bedroom houses. The Core Strategy policy is based on evidence from the research undertaken by Ecotec.
- 6.3.3. Data within the Monitoring Report and Housing Trajectory 2015 (“Monitoring Report”) confirms that in 2014/15, affordable 3+ bedroom new homes comprised 37% of the total affordable (affordable rented, social rented and intermediate) units delivered, while 63% of the affordable new homes were 1 and 2 bedroom flats. For market/private housing, the proportion of 3+ bedroom new homes was 23%, while 77% were 1 or 2 bedroom flats. The proposed development will provide for the following:

Unit size	Proposed Number	%	Existing Number	%
1b	115	28.19	19	11.11
2b	196	48.04	116	67.84
3b	83	20.34	36	21.05
4b	14	3.43	0	0
TOTAL	408		171	

- 6.3.4. Although the above table shows that the development would continue to fall significantly short of the Core Strategy target, it does indicate a small improvement in the provision of 3+ bedrooms whilst also providing some 4-bed accommodation where previously there had not been any. Moreover, although the overall provision of 3+ bedrooms is short of the Core Strategy target, this should be weighed against the significant increase in the provision of housing across the site.

Affordable Housing

- 6.3.5. Affordable housing is social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market housing (London Plan Policy 3.10). Affordable housing targets are set by individual boroughs based upon an assessment of need over the plan period. Policy DMD1 confirms that the borough-wide affordable housing target is 45%, with a target tenure mix of 70% social / affordable rent and 30% intermediate.

- 6.3.6. Of the 408 units to be provided, 140 (34%) will be affordable. Although below the policy target, an independent viability review of the scheme concludes that the development provides the maximum level of affordable housing and an appropriate mix of units. In this regard, it is therefore considered that the development is consistent with Policies 3.8 and 3.14 of the London Plan, Core Policy 5 of the Core Strategy and DMD Policies 3 and 4 of the Development Management Document.
- 6.3.7. It is considered appropriate to secure the tenure, mix and size of units through an appropriately worded condition to ensure that any potential future changes are fully policy / standards compliant and appropriate levels of contributions have been secured.

6.4. **Impact on Character of Surrounding Area**

Density

- 6.4.1. Any assessment of density must acknowledge the NPPF and the London Plan, which encourage greater flexibility in the application of policies to promote higher densities, although they must also be appropriate for the area. The site has a PTAL score of 1a-2, thereby suggesting that a level of density in the range of 150 to 250 habitable rooms per hectare (hr/ha) or 35 to 75 units per hectare (u/ha) may be appropriate for this location. A total of 1360 habitable rooms in 408 units are proposed on a site measuring approximately 4.27ha, equating to a density of approximately 318hr/ha or 95u/ha. This compares with 171 existing units providing a density of approximately 40hr/ha.
- 6.4.2. The scheme exceeds the suggested density range thereby suggesting that the level of development may not be appropriate for this location, however policy 3.14B of the London Plan also confirms that the loss of housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. A numerical assessment of density is but one factor to consider in assessing whether the site is capable of accommodating the quantum of development. Consideration must also be given to the design and quality of accommodation to be provided, the siting and scale of the development, its relationship to site boundaries and adjoining properties and the level and quality of amenity space to support the development. These factors are considered below:

Design

- 6.4.3. The NPPF (section 7) confirms that the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. Paragraph 59 of the NPPF confirms that design policies should “*avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally*”. Paragraph 60 advises that “*decision should not impose architectural styles or particular tastes...[nor] stifle innovation, innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles...[although it is] proper to seek to promote or reinforce local distinctiveness*” while paragraph 61 advises that “*...decisions should address...the integration of new development into the natural, built and historic environment*”. Paragraph 64 confirms that when development fails to take opportunities for improving the character and quality of an area and the way it functions through poor design, permission should be refused. This is reiterated at DMD37 (“Achieving High Quality and Design-Led Development”) where it is advised that development which is not suitable for its

intended function, that is inappropriate to its context, or which fails to have appropriate regard to its surroundings, will be refused.

- 6.4.4. London Plan policy 7.1 (“Lifetime neighbourhoods”) advises that the design of new buildings and the spaces created by them should “*help to reinforce or enhance the character, permeability, and accessibility of the neighbourhood*” while policies 7.4, 7.5 and 7.6 confirm the requirement for achieving the highest architectural quality, taking into consideration the local context and its contribution to that context. Design should respond to contributing towards “*a positive relationship between urban structure and natural landscape features...*” Policy DMD37 (“Achieving High Quality and Design-Led Development”) confirms the criteria upon which applications will be assessed.
- 6.4.5. The surrounding area is characterised by residential developments consisting predominantly of terraced and semi-detached dwelling of two-storeys in height, some with accommodation within the roof space. The change in topology is reflected in the gradual stepping down / up in ridge / eaves levels.

Gateway Buildings

- 6.4.6. The scheme will introduce four “gateway buildings”, located on the eastern and western ends of the development site. Fronting Avenue Road are Blocks F1 (3 to 4.5 storeys) and F2 (3.5 to 4 storeys) immediately adjacent to Nos.73 and 79 Avenue Road respectively. At the western end, primarily overlooking the “eco garden” are Blocks G3 (3 to 4 storeys) and H4 (3 to 4 storeys), which are located to the rear of Nos.65 to 69 Hood Avenue and Nos.18 to 22 Cowper Gardens respectively.
- 6.4.7. Having regard to the aforementioned “design” guidance and policies, it is considered that the relationship between Block F2 to No.79 Avenue Road could be improved by respecting the existing eaves and ridge levels in order to provide a better transition between the traditional 2-storey semi-detached dwelling house and the new building. As currently proposed, the eaves of Block F2 will be level with the chimney of No.79. This poor relationship is further exacerbated by its greater height and massing much nearer to that common boundary (approximately 2.1m to the boundary and 5.5m between flank walls), where currently there is an open spacious gap between developments (approximately 13m to the common boundary and 15m to flank wall). Block F1 provides a slightly better transition because whilst not respecting the eaves level of No.73, the relationship is improved due to the respective roofs hipping away from each other. It should be noted that whilst Block F1 is sited very near to the common boundary and does extend 3.2m beyond the main rear building line of No.73 Avenue Road, the existing block is 1m from the boundary (3.2m between flank walls) and extends approximately 6.3m beyond the main rear building line but is only 2-storeys in height.
- 6.4.8. With regard to Block G3, it will be sited approximately 3.8m from the rear boundary of those properties fronting Hood Avenue. Although it would have been preferable for this building to be no greater than 2.5 to 3-storeys, to again, tie in with the surrounding terraces, the level of distancing to the properties fronting Hood Avenue (26.6m - flank wall to rear wall) is considered sufficient to limit any harmful impact from the height and massing of this building on the existing amenities of the occupiers of the properties fronting Hood Avenue.
- 6.4.9. Similarly, Block H4 is approximately 3m from its common boundary with the dwellings fronting Cowper Gardens. Its relationship to those properties, given the height and massing of the proposed block is again mitigated by the level of distancing

(approximately 20m - flank wall to rear wall), and on balance is considered acceptable.

- 6.4.10. Eight mansion blocks are proposed, primarily around the junctures internal to the site coming off The Avenue. These are: Buildings A1 (7-storey); A2 (9-storey); B1 (6-storey); D1 (7-storey); D2 (6-storey); E1 (6-storey); G1 (5-storey) and H2 (5-storey). Buildings A1 & A2 and D1 & D2 will be linked via a 6-storey and 5 to 5.5-storey block of maisonettes / flats. Building A2 will be one of the “landmark” buildings of the proposed development at 9-storeys in height.

Mansion Blocks

- 6.4.11. Mansion blocks are a form of development that is not common to the site or the wider area, which is more characterised by fine-grained development. The overall design is similar, although they vary in height, having regard to the changing topography. The bulk and size of the mansion blocks is emphasized with the double-height roof, with only one elevation having the roof face pitch away from the road frontage, although the verticality / height of this element is again emphasised with the introduction of the multiple double-height dormer windows. The remainder of the “roof element” is contained within parapet walls which whilst provided with articulation on their flank elevations through the introduction of fenestration and balconies, are left with rear elevations with little articulation to provide visual interest or relief.
- 6.4.12. The lower linking blocks between the taller elements of the mansion blocks have been improved through the introduction of single storey height banding of projecting brickwork which increases to double-height over the entrances, thus linking the lower linking blocks with the taller elements.
- 6.4.13. The tallest element of the scheme is the 9-storey Block A2, which would in effect replace the 10-storey Shepcot House which is currently located in the space between proposed Blocks D2/D3 and E1/E2. Given the broad typology of the wider area, Shepcot House stands out as an anomaly. The Council’s Report on *Location of Tall Buildings and Important Local Views in Enfield (2013)*, one of the supporting documents for the DMD, stated the following in relation to Shepcot House:
- “Out of centre location lacking good transport accessibility that is inappropriate for a tall building. The existing block is not of high quality architectural standard; does not contribute positively to the public realm / surrounding environment; is intrusive in local views and does not aid legibility of the borough”* (pp 21-22).
- 6.4.14. Whilst it would have been preferable to reduce the height of Block A2, DMD43 (“Tall Buildings”) acknowledges that due to a variety of reasons, it may not always be possible to reduce height. In this regard, the proposal should be justified against the criteria contained with part 4 of the policy. Having regard to those criteria, it is considered that this element will satisfy the test contained in DMD43 part 4.
- 6.4.15. Although mansion blocks are not typical to the area, with a need to increase housing provision, to produce a viable scheme but also mindful of the need to keep building heights as low as possible, well-designed mansion blocks could prove difficult to resist. Moreover, whilst mansion blocks are not typical to the wider area, members are reminded that the typology within the existing estate is one of blocks of flats primarily of 3- and 4-storeys in height.

Townhouses

6.4.16. The Townhouses (Buildings A4, C3, D3, E2, E3 G2, H3), which will generally be 3-storeys in height, are of a typology that is considered to be the most compatible with the developments in the wider area. The respective distancing to boundaries is considered acceptable in general.

6.4.17. The townhouses, not being maisonettes or flats, potentially have the full suite of permitted development rights available for occupiers. The appearance of proposed developments can be insensitively altered following occupation, through the implementation of householder permitted development rights, such as the introduction of dormer windows, extensions, satellite dishes, the insensitive alteration of front gardens through the loss of greenery and the introduction of hard surfacing, albeit permeable, and widened access points. It is considered appropriate to restrict permitted development rights, to enable a degree of control over any future alterations that individual occupiers may wish to introduce.

Lousada Lodge

6.4.18. Lousada Lodge (Block K1) will be a 3-storey building located to the rear of an existing 3-storey building (with 2-storey rear extension) fronting Avenue Road. The additional height of the proposed building, when compared to the extension, should not be seen from Avenue Road and the distancing between the extension and the proposed building negates any potential impact on existing residential amenity. In addition, it is considered that sufficient distancing is maintained between the proposed block and neighbouring properties to the north and south to not appear unduly overbearing. It should be noted that as originally submitted, Lousada Lodge was a 4-storey building but due to concerns over this building appearing unduly dominant, overbearing and with concerns in relation to overlooking and loss of privacy, this element was reduced in height.

Nursery / Community Use Building

6.4.19. The development proposal includes the provision of a single storey, stand-alone building (J1) to accommodate a dual-use nursery / community centre, with a total floor area of approximately 320sqm. The existing estate is currently served by an unlawful nursery at the base of Shepcot House but through the passage of time, is now immune from enforcement action. Given the existing provision of nursery places and the expected increase in numbers on site, a re-provided nursery is considered acceptable.

6.4.20. This building has been designed to take advantage of the change in levels between the top and middle terrace levels and as a result, the building cuts into the embankment, with the roof approximately 0.8m above ground level of the upper terrace. Whilst it is indicated that the roof surface will be equipped to contribute to the provision of play space on site, details have not been finalised but can be secured by condition. An external play space for the nursery is located immediately north of the building.

6.4.21. Internally, the nursery will be able to largely function separately to any concurrent community use, with its own kitchen, although toilet facilities would need to be shared. The community hall has its own kitchen and the main hall will have a retractable screen to enable it to be divided into two smaller spaces.

6.4.22. Further details will be required in terms of the operational aspect of the uses. These can be secured by condition.

Layout

- 6.4.23. The layout of the development is a response to the irregular shape of the development site, the significant changes in levels across the site, and the underground culvert with its 4m easement on either side.
- 6.4.24. The Upper and Lower Avenue provide the main pedestrian and vehicular route through the site. Its prominence is defined by its width (compared to other streets on the site), the trees aligned alongside it and with the tallest buildings on the site (the mansion-style blocks) fronting onto it. In contrast, secondary streets are defined by narrower streets, shared surfaces between vehicles and pedestrians, and with buildings typically located at the end of the street, such as Block E3, providing a clear terminus (although this could equally be achieved with appropriate landscaping). The hierarchy of the street network, which is also recognised in building heights, provides recognised routes through the site which will have a positive impact on way-finding.
- 6.4.25. The proposed layout does allow for the free-flow of pedestrians and vehicles, overcoming the existing barriers to movement, representing a significant improvement to the existing situation.
- 6.4.26. The community and nursery building is located in the centre of the site and provides a focal point for people entering the site from all directions and helps positively integrate the development within the surrounding area. The range of buildings coupled with the street layout and public realm provide distinct character areas which contribute to place-making, having regard to DMD37.

Quality of Accommodation

- 6.4.27. To improve the quality of new housing, the new development must meet with the minimum standards contained within the London Plan (Policy 3.5 Quality and design of housing developments). Table 1 below demonstrates that the proposed GIA for each unit will meet with or exceed the respective adopted minimum standard. The scheme is therefore considered acceptable with regards to this element.
- 6.4.28. Turning to individual rooms, the nationally described space standards, advises that the preferred minimum floor areas for single bedrooms and double / twin bedrooms is 7.5sqm and 11.5sqm respectively. The combined floor areas for living / dining / kitchen space are dependent upon occupancy level. Each unit meets with or exceeds the minimum standards.

Amenity Space Provision

- 6.4.29. Policy DMD9 provides the standards for the level of private amenity space provision for each unit and is primarily based upon the number of rooms and occupancy level. The standards represent the absolute minimum, although regard must also be given to the character of the area.
- 6.4.30. The development site currently provides approximately 20,775sqm of public / communal amenity space, with the majority being included within the Hood Avenue Open Space (13,300sqm) and Cowper Gardens Open Space (4,817sqm). As discussed above, policy DMD71 confirms that the loss of open space will be resisted unless the proposal either replaces the open space in the same locality with one of better quality or it is demonstrated that the open space in question is surplus to requirements. Policy DMD72 requires all new major residential developments to include proposals to improve open space provision.

- 6.4.31. The development will result in a net loss of open space at Hood Avenue, however the quality of the space which is to be re-provided is considered to weigh in favour of this element. The publicly accessible spaces are designed to respond to different age groups, with the development incorporating natural play as well as equipped facilities. A community garden is also proposed adjacent to the improved pedestrian route between Hood Avenue and the site. This route will comprise of a terraced series of community spaces inclusive of under 5's doorstep play space, a community food growing space with raised beds, and an outdoor gym at the level of the main avenue.
- 6.4.32. With specific regard to play space provision, this is based upon 10sqm per child calculated against the child yield of the development. This has been calculated as follows:

Age Group	Numbers of Children
> 5 years	103
5 - 11 years	59
12+ years	33
Total	195

- 6.4.33. The above table indicates that a total of 1,950sqm of play space should be provided. It is confirmed that the required amount of play space is provided on site. Moreover, a number of parks and open space is located within 800m of the development to cater for the older age groups.
- 6.4.34. Private gardens will exceed minimum adopted standards. Podium courtyards will be for use by the residents of the flats within each block. They will have private gardens around the perimeter which open into the courtyard. Each courtyard will provide a number of opportunities for outdoor activity such as doorstep play for under 5's, new planting, and areas of seating. All private amenity space is designed with a level threshold access (maximum 15mm upstand) to ensure the amenity areas are accessible to those in a wheelchair and ambulant disabled persons. Balcony and terrace areas are designed to be a minimum 1500mm deep.
- 6.4.35. To maintain the quantity and quality of the private amenity space, it is recommended that a condition is imposed to restrict permitted development rights for extensions and outbuildings (Article 3 and Schedule 2, Part 1 Classes A & E).

Daylight / Sunlight Levels

- 6.4.36. A daylight and sunlight assessment has been provided to establish whether the accommodation proposed will receive acceptable levels of lighting. The assessment has been undertaken in accordance with the recommendations of the Building Research Establishment ("BRE") report *Site Layout Planning for Daylight & Sunlight 2011*. Two methodologies have been used: the average daylight factor ("ADF") method; and the No-sky view ("NSV").
- 6.4.37. The ADF method used assesses the quality and distribution of light within a room, having regard to the size / number of windows and room use / size. It is considered to be the most effective way to assess daylight provision. The minimum ADF values for kitchens, living rooms and bedrooms is 2%, 1.5% and 1% respectively. The NSV measures the percentage of a room's area which does not receive any direct skylight. If more than 20% of a room does not receive any direct skylight, poor daylight levels are expected.

6.4.38. Daylight analysis results indicate that the majority of the assessed rooms comply with the BRE standard. Sixty nine percent of the living spaces achieve adequate daylight and 83% of the rooms have the potential to have a clear view of the sky. For most units which do fail BRE guidelines, this is mostly due to the position of balconies that overshadow rooms. Balconies are considered to be integral to the development as they provide much needed private amenity for the relevant units.

6.4.39. With regard to external spaces, BRE Guide recommends that for a garden or amenity to appear adequately sunlit throughout the year, at least half of it should receive at least two hours of sunlight on 21 March.

6.4.40. The overshadowing assessment shows that at least 50% of the area of 6 out of 8 communal spaces is expected to receive more than 2 hours of sunlight on the 21 March and therefore comply with the BRE standard. Two out of 8 communal spaces fail the compliance and have been tested on the 21 June, the summer solstice. In the summer, when these areas are most likely to be occupied, high percentages of the areas are well-lit for at least 2 hours per day.

Lighting Strategy

6.4.41. The external lighting scheme has been developed for all areas within the proposed regeneration area, including:

- Streets
- Public amenity spaces
- Shared private amenity spaces and courtyards

6.4.42. All streets will be lit by highways standard lighting columns. The key public amenity spaces within the site such as 'Avenue Gardens' will be lit by feature lighting columns that will help to reinforce the special character of these areas. The lighting scheme will need to be carefully designed in order to avoid overspill light pollution on existing neighbouring housing or have a negative impact on areas of nature and wildlife. Details will be secured by condition.

6.5. Impact on Neighbour Amenity

Loss of Light / Overshadowing

6.5.1. The proposed development will result in a significant increase in the bulk and massing of the built form nearer to boundaries. The aforementioned daylight and sunlight assessment has considered the impact of the development on the neighbouring properties. A Technical Note (06/07/16) was also subsequently issued to address specific concerns raised by the occupier of No.79 Avenue Road.

6.5.2. The impact of the new development on the sunlight levels of neighbouring residential buildings has been carried out in accordance with the BRE Guide. Only windows facing 90° of due south have been considered in the analysis. If the new development intersects a 25-degree plane, daylight access of the assessed window may be reduced. A more detailed assessment should be then carried out to calculate the loss of sunlight to the existing window.

6.5.3. Representative units of the proposed scheme have been assessed in terms of internal daylight provision. Over 69% of main living areas, i.e. kitchens, living/dining rooms and bedrooms, comply with the BRE standards in terms of average daylight

factor and 83% comply in terms of view of the sky. For most units which do fail BRE guidelines, this is mostly due to the position of balconies that over shade rooms. Notwithstanding this, we consider the position of the balconies to be an integral part of providing a high quality scheme as they provide private amenity space and offer shading against excessive solar gains that can enter the units and create overheating. The architects have sought to mitigate the effect by positioning most of the balconies in a location where they over shade bedrooms as opposed to spaces that are occupied during the day such as living rooms and kitchens. Window sizes have also been maximised to ensure that the occupant has a sense of openness and view of the sky.

6.5.4. Several properties failed the initial test, as portrayed in the image below:



6.5.5. Further analysis would appear to demonstrate that the vertical sky component (“VSC”) on the windows of S1, S2 and S5 properties is higher than the BRE benchmark of 27%, therefore, it is expected that the proposed development will not have a harmful impact on those properties, as they will receive adequate daylight after it is constructed. The VSC on the windows of S3 (No.73 Avenue Road) and S4 (No.79 Avenue Road) is lower than the BRE benchmark of 27%. Therefore, the third test of the comparison method has been undertaken for the windows of those two units that face the proposed development.

Impact on Unit S3 (No.73 Avenue Road)

6.5.6. Unit S3 has only two windows which face the development and may be impacted by the proposed development. One window fails the test and will be affected by the development, as it has lost more than 20% of the daylight that it previously received. However, the conclusion contained within the *Daylight Assessment* is that the effect is considered to be minor as it is only 13.5% below the limit of BRE. Due to window W1 of unit S3 failing the VSC test and as planning consent has been sought for an extension, a full analysis of the ADF of the dwelling after the extension is built has been undertaken. The living spaces assessed are the ones that have windows facing the proposed development. These are the dining and kitchen located at the rear of the ground floor as well as two bedrooms located at the first floor. Bedroom 2 which is located at the rear and bedroom 3 in the middle. The ADF analysis is more accurate than the VSC as it accounts for the internal layout of the properties. All dimensions are based on the drawings produced by Egg Architecture in May 2014.

- 6.5.7. The results show that there will be enough daylight in all three rooms as per BRE guidance. The kitchen and dining area have an ADF of 5.8% which is well above the respective targets of 2% and 1.5%. The Sky-View which describes the view of the sky from the working plane level meets BRE compliance. Bedroom 2 at the rear and Bedroom 3 in the middle of the house will receive a great amount of daylight reaching high ADF. The Sky-View at bedroom 2 is at 96% meeting BRE compliance whereas Bedroom 3 in the middle will have a Sky-View of 74% which means that it fails to meet the recommended value by 6% which is considered marginal.
- 6.5.8. The results when compared with the VSC results of the existing building prove that the daylight will be significantly enhanced when the extension is built and there will be no impact from the proposed development. There will be enough daylight in all three rooms as per BRE guidance. A great amount of new windows will be installed that will greatly improve daylight within the space. The rear ground floor windows as well as the roof lights will offer plenty of daylight in the kitchen and dining area turning it into a very well-lit habitable space. The large windows of bedroom 2 and the strategically positioned window at bedroom 3 which will be directed towards New Avenue road will ensure that adequate daylight reaches the room. The Sky-view will be the only element very marginally failing but this will be a minor impact as it is only 5% below the target.
- 6.5.9. Notwithstanding the above, members will be aware that whilst permission has been granted for an extension at the above property, it may never be implemented, therefore consideration must be given to the existing situation.

Impact on Unit S4 (No.79 Avenue Road)

- 6.5.10. Number 79 Avenue Road, will be directly adjacent to Block F2, with Block F4 extending off it into the site. The existing building on Beardow Grove, a 3-storey development, is currently separated from No.79 by the access road formed by Beardow Road, resulting in distances of 11m to the common boundary and 15m to the flank wall. It also sits approximately 7m behind the front building line of No.79 Avenue Road. Block F2 will be sited approximately 2.1m from the common boundary and 5.5m from the flank wall while Block F4 will be approximately 11.5m from the flank wall. In addition, at its nearest point to the common boundary, Block F2 will be approximately 10.5m in height (same level as the chimney at No.79 Avenue Road).
- 6.5.11. Two windows (W1 and W2) face the proposed development and both fail the comparison method test by 33.5% and 46.7% respectively and will therefore be affected by the development. From a site visit, the two windows referred to serve a bedroom and kitchen respectively. It should be noted that the kitchen is also served by a west facing window therefore there may be a slight improvement from the quoted test result. Notwithstanding this, the level of harm to these windows is significant.
- 6.5.12. Although the occupier also refers to the potential impact on a first flank window serving a bathroom, it should be noted that only light levels to main living areas (kitchens, living rooms, bedrooms) are considered.
- 6.5.13. With regards to overshadowing, this has been modelled specifically on No.79. The modelling confirms that 59% of the rear garden will receive more than 2 hours of sunlight on the 21st of March, which means that there will be adequate sunlight provision. This amount of sunlight exceeds the BRE Guidance which recommends that at least 50% of the garden should receive 2 hours of sunlight on the 21st of March.

6.5.14. With regard to the remainder of the development, the overshadowing assessment also shows that at least 50% of the area of 5 out of 8 private gardens is expected to receive more than 2 hours of sunlight on the 21 March and therefore comply with the BRE standard. Three out of 8 private gardens fail the compliance and have been tested on the 21 June. In the summer, when these areas are most likely to be occupied, high percentages of the areas are well-lit for at least 2 hours per day.

Summary

6.5.15. It is acknowledged that the development will cause some harm the level of light into No.79 Avenue Road. The applicant considers that being a new development, the guidelines should be treated as guidelines and strict daylighting thresholds applied across the scheme are inappropriate in this case. Moreover, the applicant argues that designing the homes, streets, and squares to all meet a particular daylight threshold would not help to produce an enjoyable and varied urban environment nor would it deliver the optimisation of the use of land. Whilst this view is acknowledged, there are alternative approaches to designing, as new developments can be designed to minimise any impact to the amenity of existing neighbours.

6.5.16. Whilst the greater part of the scheme should not unduly harm existing amenity in terms of loss of light and overshadowing, the harm to one neighbouring occupier must also be given appropriate weight. The relationship between No.79 Avenue Road and the new development (Blocks F2 and F4) can be considered no worse than that between traditional terraced and semi-detached properties and on balance, it is considered that the development would not be detrimental to the amenities of adjoining occupiers, having regard to CP30 of the Core Strategy, and DMD8 of the Development Management Plan.

Distancing / Loss of Outlook / Overlooking / Loss of Privacy

6.5.17. It is acknowledged that given the greater massing of buildings nearer to boundaries, particularly where none currently exist, the outlook for neighbouring occupiers will change. Policy DMD10 (“Distancing”) confirms the minimum distances considered acceptable to maintain a sense of privacy, avoid overlooking and overshadowing, and provide sufficient levels of sunlight. The table below provides the minimum acceptable distances, although it should be noted that development below those stated may be considered acceptable where it does not compromise development on adjoining sites or supported by daylight / sunlight assessments.

	Number of storeys in facing buildings					
	1 - 1	1 - 2	1 - 3	2 - 2	2 - 3	3 - 3
Minimum distance between rear facing windows (in metres)	22	22	25	22	25	30
Minimum distance between windows and side boundaries	11m					

6.5.18. The majority of buildings however, are considered to be sufficiently sited from respective boundaries or are fortunate to have neighbours with sufficiently deep gardens in order to not detrimentally harm outlook, particularly in a suburban setting.

6.5.19. Concerns have been raised by neighbours in relation to overlooking and loss of privacy. The majority of buildings are considered to be sufficiently sited from respective boundaries in order to not lead to conditions which are considered

detrimental to neighbour amenity, particularly in a suburban setting. Some buildings however, as discussed above, are sited quite near to boundaries and with some proposed windows looking towards neighbouring external occupiers, it is considered appropriate to ensure that these are obscure glazed and fixed shut. In some areas, existing boundary treatments will also help mitigate any potential for overlooking and loss of privacy.

6.6. Highway Safety

- 6.6.1. Policy 6.3 of the London Plan confirms that the impact of development proposals on transport capacity and the transport network are fully assessed. The proposal must comply with policies relating to better streets (Policy 6.7), cycling (Policy 6.9), walking (Policy 6.10), tackling congestion (Policy 6.11), road network capacity (policy 6.12) and parking (Policy 6.13). Policies DMD45 & 47 provide the criteria upon which developments will be assessed with regard to parking standards / layout and access / servicing.

Parking

- 6.6.2. The maximum parking standards of the London Plan per unit are set out below, although it is advised that all developments in areas with a good PTAL score should be aiming for significantly less than 1 space per unit.

Number of beds	4 or more	3	1-2
Parking spaces	Up to 2 per unit	Up to 1.5 per unit	Less than 1 per unit

- 6.6.3. The site, as discussed above, is located in an area with a poor PTAL score (1a-2), therefore the development should be aiming to provide nearer to the maximum level of parking.

Unit Size	Number of Units Proposed	Minimum Provision	Maximum Provision
1b	115	46	115
2b	196	137.2	196
3b	83	91.3	124.5
4b	14	22.4	28
Total	408	296.9	463

- 6.6.4. The Transport Assessment (“TA”) indicates that the development proposals include the provision of 330 spaces, which is significantly less than what is normally considered acceptable in such a location. Regional and local policies indicate that lower levels of parking can be accepted in areas which are well connected to public transport services (or where significant improvements are being made to public transport provision) and have good links to local amenities. Although the applicant makes reference to the availability of shops and bus services within a kilometre of the site, the development site covers an extensive area and is subject to significant level changes. Therefore in reality the walking distances to buses and other local amenities will be more than 1km depending on the particular location within the site.
- 6.6.5. According to TfL’s *Measuring Public Transport Accessibility Levels Overview*, (April 2010) for rail, underground and light rail services, the maximum walking distance is 960 metres. Depending on which part of the site the journey begins, distances to local amenities could be significantly more than a kilometre. The low PTAL is likely to remain as there are no proposals for developer funded bus service enhancements.

Therefore, the site does not have the ease and convenience of access to public transport and local services necessary to justify lower levels of car parking provided.

- 6.6.6. Following further discussions, and in recognition of the proposed housing mix, Transportation have identified a parking ratio of 0.8 parking spaces per unit as what should really be the lowest acceptable parking ratio for the development, although TfL considers this to be the maximum level of provision. However this excludes visitor parking (usually between 10-20% of total provision) and provision for the loading / unloading of vehicles servicing the development.
- 6.6.7. In response, the scheme proposes 330 car parking spaces, although 35 of these will be accommodated around the Cowper Gardens Open Space. Concerns have been raised about the use of the Open Space for parking due to the likely adverse impacts on highway safety and the free flow of traffic on the highway. Moreover, being on public highway, the spaces cannot be set aside solely for the benefit of the residents of the new development. Therefore, it is considered the spaces around the Open Space should not be included which leaves 295 spaces and a parking ratio of 0.72.
- 6.6.8. The submitted TA makes a case for the overspill parking to be simply accommodated in surrounding streets. The inherent loss of publicly available on-street spaces and the adverse impact on amenity for existing residents' makes this parking proposition contrary to DMD45. This policy indicates that "*operational needs of developments must be adequately met*" within the boundary of the site. In addition, there is limited capacity in the surrounding area so any significant displacement of parking would have an impact on the amenity of existing residents (the DMD states that proposals must be considered against "existing parking pressures in the locality"). On-street parking as proposed is only considered acceptable for irregular visitor parking, not as a solution to onsite parking requirements.
- 6.6.9. In an attempt to be pragmatic and recognising the desire to optimise the number of units on this site, regard has been given to the mix of units and the level of parking associated with the existing residential development (i.e. census data). On this information, 313 spaces should ideally be provided for the mix / tenure of development proposed. This equates to a parking ratio of 0.77 which it is felt would prove sufficient to ensure that the development will not generate unacceptable levels of over-spill parking onto surrounding streets nor, adversely affect the functionality of the surrounding local highway network.
- 6.6.10. This delivery of 313 spaces is based on the assumption being that the additional spaces can be accommodated on the vacated Mews site (Block C2). It should be noted that without using the Mews site, 295 spaces would be available and the parking ratio would be reduced to 0.72, 18 spaces less than the ideal ratio of 0.77.
- 6.6.11. It is recognised that there is a difference of opinion between what the TfL (and GLA) and Traffic & Transportation consider to be an appropriate ratio for parking provision. Whilst the role of TfL is to provide a strategic overview, it is also recognised at London Plan policy 6.15 that a flexible approach is needed and outer London boroughs should take account of residents' dependency on the car in areas with low public transport accessibility (generally PTALs 0-1). The level of parking provision is of course a key consideration when balancing often competing merits of policy and development but it is also unclear whether the parking arrangements proposed make optimal use of all available highway space, although it is also acknowledged that maximising parking provision could have a negative impact on the public realm.

- 6.6.12. The addendum to the TA, submitted in September 2016, provides a detailed account of the parking provision for other schemes which have recently been granted planning permission, including the Alma Estate Renewal and the Meridian Water developments, and attempts to demonstrate how these are similar to the New Avenue development.
- 6.6.13. These developments, due to their individual circumstances however, cannot be taken as establishing clear precedent. The Alma Estate is in an area of much better access to public transport, and the applicant is making significant contributions to fund sustainable transport improvements and effective mitigation measures to limit any adverse impacts associated with the parking demand of the development. In addition, there are a number of recently approved large scale developments in the Ponders End area which have contributed to improvements in the management of parking and traffic in the area, including junction improvements and Cycle Enfield.
- 6.6.14. Meridian Water has similarly been approved with a lower than 1:1 parking ratio because of the significant sustainable transport contributions made by the developer (inclusive of funding a new, accessible rail station), which will significantly improve the accessibility of the area to public transport services.
- 6.6.15. The proposed development in its current form provides a parking ratio of 0.72 which is lower than that recommended having regard to Policy 6.13 of the London Plan and DMD45 of the Development Management Document.
- 6.6.16. The proposed level of parking does not take into account the need for visitor parking, which is generally 10-20% of the total parking provision. However, since the site covers a wide area it is considered reasonable for irregular visitor parking to be wholly accommodated on-street without having a detrimental impact on the amenity of the existing residents in the surrounding area. This approach is therefore considered acceptable.
- 6.6.17. The TA suggests a car club operator maybe on board to provide car club facility on site. However, details of the operator have not been confirmed. Car club provision on this site may have limited positive impact on parking demand because car clubs are most effective in locations with better access to a range of alternative travel options and where they replace a 2nd vehicle. In addition, it is likely that, given the tenure and type of the proposed accommodation, car club provision will appeal more to those residents who might not otherwise be able to afford to own a car. However, it is acknowledged that car club provision is a positive step and could provide some mitigation against the additional demand as set out above.
- 6.6.18. The location of any car club bays will need to be identified and provided on a plan. The car club spaces proposed for the site will be required prior to any planning decision being made. Evidence and correspondence between the applicant and the car club operators is missing from the TA. The Council requires more certainty that car clubs have been thoroughly considered as part of the design process. In addition to encourage take up, there should be 2 years membership and suitable driving credit offered to every household.
- 6.6.19. A detailed parking layout plan which shows the proposed location of all parking spaces including disabled bays, active and passive electric charging point bays and car club bays (as agreed with the car club operators within the borough) should be provided. Dimensions of all parking spaces should be provided according to the appropriate design standards.

6.6.20. Some discussion has taken place over the possible impacts of a Controlled Parking Zone (“CPZ”). If a suitable CPZ was put in place and a significant number of residential units were exempted from obtaining permits, consideration could be given to lower levels of on-site car parking provision. However there would be a number of issues with this approach:

- Visitor parking would have to be provided because residents would be unable to obtain visitor parking permits for the CPZ area;
- It would have a negative impact on the desirability of the development particularly for the market units;
- It could be deemed unsustainable, particularly for the larger units, given the site’s poor access to public transport; and
- It relies on a CPZ being agreed to by residents of neighbouring areas and would have a significant cost attached (c.£100,000).

6.6.21. Rather than relying on the implementation of CPZs, it would be preferable for the development to have more regard to appropriate density levels given the sites poor access to public transport, with commensurate provision for resident and visitor car parking, taking into account existing on-street pressures.

Cycle Parking

6.6.22. For residential developments, the London Plan requires 1 space per 1-bed unit and 2 spaces for each 2-bed unit or greater (long-stay) and 1 space per 40-beds for short-stay (visitor). The nursery / community centre requires 1 space per 8 staff in addition to 1 space per 8 students (short stay), while for visitors 1 space per 100 students (long stay).

6.6.23. This equates to a total minimum provision of 732 spaces comprising of 713 long-stay spaces and 10 short stay spaces for the residential element and 3 long-stay spaces and 6 short stay spaces for the nursery / community centre. The TA suggests that 707 cycle parking spaces will be provided. An increase in cycle parking provision can be reasonably secured by condition.

6.6.24. Details of the bike storage areas have not been provided. This information is key and fundamental to the design and acceptability of the scheme. Detailed plans showing all cycle stores, number of spaces, type of stands, dimensions of the cycle store, materials of the racks and stores etc. should be provided. Details of the location of the visitor spaces across the site should also be included. The design of the bike storage areas must indicate that it is big enough to accommodate cycles with stands/racks allowing both the frame and at least one wheel to be secured. The long-stay cycle parking must be lockable (ideally by an access fob or a mortice lock), sheltered from the weather, and lit. An appropriately worded condition will be imposed to secure the above details.

Trip Generation

6.6.25. The TRICS database was used to determine the total trip generation from existing uses on site. The existing site is thought to generate a total of 506 two-way daily movements (465 two trips on the main site and 41 trips from the Lousada Lodge site. However, the existing development is made up of 171 residential units and a 140sqm nursery use. The existing trip generation within the TA seems to be incorrectly based on just 117 units.

- 6.6.26. The proposed development will comprise of 408 residential units and a new multi-purpose nursery / community centre of 320sqm. According to TRICS, traffic generation resulting from the proposed redevelopment indicates that traffic on Avenue Road and Cowper Gardens will be doubled, with over 70% of the trips expected to arrive and depart from the Avenue Road access into the site and the remaining 28% from Cowper Gardens.
- 6.6.27. With the quantum of residential development being significantly increased, it is reasonable to assume that this will increase the demand for nursery places on site. It is not clear what the other uses of the community centre will be and this should be addressed. At the very least it is thought that worst case scenario in terms of trip generation for community uses should be used to assess the likely impacts resulting from the proposed development.
- 6.6.28. An assessment of the capacity of the Avenue Road / New Avenue / Orchard Avenue junction, using a 2025 growth year scenario with development traffic was carried out without the existing right turn lane. The results indicate that the junction operates without any significant queuing or delays to traffic on Avenue Road.

Access

Avenue Road Access

- 6.6.29. As part of the proposals, Avenue Road, a residential road with a speed limit of 30mph and which currently serves a small proportion of the existing estate, will become the main point of vehicular access into the site. It has a relatively wide carriageway (11m) with significant volumes of traffic. Speed surveys have recorded 85th percentile speed in excess of 38mph on a 30mph road. These results show that there is an issue with traffic speeds on Avenue Road and the intensification in both vehicle and non-vehicle trips generated by the proposal is therefore a significant cause for concern.
- 6.6.30. Mitigation measures, including traffic calming measures along Avenue Road will therefore need to be carried out (and secured via a S278 Agreement). The proposed new Avenue Road/New Access/Orchard Avenue Junction will be a raised table junction, the removal of the existing right turn ghost island facility on Avenue Road and the reduction of the carriageway on Avenue to reduce traffic speeds and improve highway safety. The proposed new junction will also provide an improved environment for the increased pedestrians/cyclists movements resulting from the redevelopment. The estimated cost of the speed table and additional traffic calming measures on the approaches (such as speed cushions) is £160,000; which should be secured via S106 agreement to provide these necessary road safety improvements.

Cowper Gardens Access

- 6.6.31. Cowper Gardens currently provides a single point of access to the north of the site from the Fairway. It is made up of a number of cul-de-sacs and by its very nature reduces vehicular speeds along its entirety. It also provides access to an existing public right of way ("PROW") between Cowper Gardens and Hood Avenue.
- 6.6.32. As part of the new scheme, a secondary access point will be provided from the existing Cowper Gardens access which would predominantly serve the western portion of the development. At the entrance to the site, a new access is formed which takes the form of a simple priority junction, suitable for the relatively smaller volumes of traffic anticipated to use this access point. Both accesses and the internal road

network will be designed for speeds of 20mph or less, creating a home zone across the development site.

- 6.6.33. The proposals include a series of road width reductions to reduce speeds. However, the design will need to ensure that when vehicles are giving way, access for emergency vehicles is maintained. Raised junction tables would also be introduced throughout the site to constrain vehicles speeds and increase priority for pedestrians and cyclists. Secondary streets would be formed as a shared surface, where pedestrians and cyclists would be fully integrated to provide an inclusive and convivial street environment. The proposals do not indicate crossing points in these areas, but changes in surface materials to encourage low vehicle speeds.

Hood Avenue Access

- 6.6.34. Hood Avenue provides access to the south-west of the development site through Coverack Close. With footway parking on both sides for vehicles, the road is generally narrow and does not enable two vehicles to pass each other at the same time. Coverack Close is a single width carriageway and a no through road. Due to its narrow width two-way vehicle movements are restricted and bollards are installed on the footway at its access onto Hood Avenue to prevent vehicles parking.
- 6.6.35. As part of the redevelopment of the site a third access point via Hood Avenue would be closed to vehicular traffic with the exception of emergency access and utilised as a shared pedestrian/cycle route.
- 6.6.36. The principle of Avenue Road and Cowper Gardens being the primary and secondary access points respectively, with Hood Avenue forming an emergency access is considered acceptable in principle, subject to the required speed reduction measures on Avenue Road.
- 6.6.37. Moreover, this route, which was originally intended to provide access to the formerly proposed Mews houses, is considered to be an ideal area on the main site to provide additional parking spaces to contribute to the shortfall of parking spaces identified above.

Pedestrian and Cycle Access

- 6.6.38. Policy DMD45 confirms that all new developments must be designed to be fully accessible for all mobility requirements and should maximise walkability through the provision of attractive and safe layouts with pedestrian permeability.
- 6.6.39. The improvements proposed following the PERS/CERS audit to provide better pedestrian connectivity between Hood Avenue and Cowper Gardens as well as Hood Avenue and Trent Gardens are considered to be acceptable. The provision of informal crossings at The Fairway by the dropped kerbs tactile paving and the creation of build outs to footways will provide a safer crossing point for pedestrians.
- 6.6.40. The provision of informal crossings and junction improvements in and around the immediate vicinity of the application site, including Avenue Road/Chase Side/Osidge Lane junction, The Fairway/Reservoir Road junction and The Fairway/Masefield Crescent junction are considered to be acceptable and will improve crossing points for pedestrians and cyclists in the area, as highlighted by the PERS audit.
- 6.6.41. Hood Avenue and Cowper Gardens is currently linked by an existing PROW. It is considered essential that connectivity and permeability across the site for pedestrians

and cyclists is maintained. Although there is a significant level change between Hood Avenue and Cowper Gardens, the increase in pedestrian footfall which will occur as a result of the development requires significant improvements to the existing PROW through the site. The Hood Avenue-Cowper Gardens route should be designed as a shared surface access which achieves a 1:20 gradient across the entirety of access. This will improve pedestrian permeability through the site and ensure that there is no level change between the vehicular and pedestrian/cyclist access from this location.

6.6.42. At present, plans indicate a gradient of 1:30 around the Hood Avenue/Coverack Close junction, increasing to a 1:14 gradient through this access at its steepest point, while the access from Cowper Gardens also has sections with gradients of 1:16. These gradients are steeper than the 1:20 required for pedestrians and people with mobility impairments, and should be improved. The access is not entirely step free, which limits access for parents with buggies and access for people with mobility impairments across the site. The stepped area of the access located around the proposed new community centre and residents seeking a route to Avenue Road from Cowper Gardens would have to meander through a longer route, far from pedestrian desire lines and does not create a friendly, convenient, and permeable route through the site.

6.6.43. As discussed above, the issues surrounding gradients should be addressed in order to comply with Policy DMD47:

“All developments should make provision for attractive, safe, clearly defined and convenient routes and accesses for pedestrians, including those with disabilities. New pedestrian accesses, routes and footpaths are encouraged and should link with the surrounding street and public right of way networks where appropriate. Development will not be permitted where it compromises existing rights of way, unless alternatives of equivalent or greater attractiveness and convenience are provided”.

6.6.44. A footpath from Cowper Gardens on the north-west corner of the application site (near the play area) is proposed and which will include better lighting. This will tie in with the existing public footway leading towards Hood Avenue immediately outside the boundary on the north-west corner of the site. These improvements are welcomed and it is thought that the design should ensure that area is overlooked and creates an open, attractive, and secure space which residents are able to enjoy and utilise.

6.6.45. In summary, all pedestrian accesses across the site should have a maximum gradient of 1:20. A scaled plan showing all proposed paths across the site is required and should include details of the gradients, levels, surfacing materials, lighting, and widths. The plan should endeavour to include the pedestrian link between Cowper Gardens and Hood Avenue including crossing of Avenue Gardens (Village Green) and should tie in with the westbound public footpath in Cowper Gardens.

6.6.46. The only access from the top terrace area into the community centre / nursery appears to be via stairs or a circuitous route around the outside. A new wheelchair friendly connection should be established to comply with DMD policy and Inclusive Guidance.

6.6.47. In view of the significant level of cycle trips which will be generated as a result of the scheme, a S106 contribution of £20,000 will need to be secured to provide better links from the site to the Greenways as part of the Cycle Enfield project.

Refuse, Servicing & Emergency Access

- 6.6.48. In line with DMD47 of the Development Management Document, new development will only be permitted where adequate, safe and functional provision is made for refuse collection, emergency services vehicles and delivery/servicing vehicles.
- 6.6.49. Consultation between LBE's Waste Services Team and the applicant has confirmed that the largest vehicle likely to be used to service the development is the 10m long refuse vehicle. Whilst it is important to ensure that access is provided for refuse vehicles, it is also important to maintain access for emergency vehicles through the site. However, based on the level and scale of development proposed it is thought that an 11.33m long fire appliance will be required to service the development. Therefore all access points and internal routes should be tracked to ensure that the largest vehicle to service the site will be able to enter from all three access points and internal roads, turn and exit in a safe and convenient manner. As an absolute minimum, the width of one-way carriageways must be at least 3.7m to enable emergency vehicles and delivery/servicing vehicles into the site. These details will be secured via planning conditions.
- 6.6.50. Some areas of detail have been raised by the LBE Waste Services Team which still need to be addressed:
- How to prevent cars parking in the turning circle and on any street corners which can often cause access issues for refuse, servicing, delivery and emergency vehicles; and
 - Ensure that the bin stores are big enough to contain the correct number of containers required and allow them to be safely manoeuvred during the collection process.
- 6.6.51. According to the Manual for Streets ("MfS"), Planning Authorities should ensure that new developments make sufficient provision for waste management and promote designs and layouts that secure the integration of waste management facilities without adverse impact on the street scene. The standards require the design to ensure that residents are not required to carry waste more than 30m (excluding any vertical distance) to the storage point, waste collection vehicles should be able to get within 25m of the storage point and the bins should be located no more than 10m from kerbside for collection. Detailed designs of the refuse and recycle storage should therefore comply with these standards.
- 6.6.52. A plan showing all bin storage areas, number of bins proposed as well as the proposed refuse and recycle collection route through the site will be required via condition.
- 6.6.53. Revised swept path drawings showing an 11m rigid vehicle should be provided. The proposed refuse collection routes and strategy should be submitted and agreed with the LBE's Waste Services.

Electric Charging Points

- 6.6.54. Having regard to the requirement to provide 20% of the spaces for electric vehicle parking and a further 20% passive provision for future use, the Transport Assessment confirms that the scheme will meet with the adopted standard, although these have not been indicated on any plans. The details of the design and siting of the active / passive charging points will need to be secured by condition.

Highways Mitigation

- 6.6.55. Should planning permission be granted, a range of measures would need to be agreed through a S106 Agreement for highways improvements as outlined above and improving sustainable modes of transport through a Parking Management Plan, and a Travel Plan.
- 6.6.56. It was proposed that all roads on the estate which are currently adopted will be stopped up as part of the redevelopment of the site, with new internal roads subsequently provided and maintained as private roads by the applicant. However, in order for LBE to support the stopping up of public adopted highway, the following must be confirmed:
- A robust vehicle and pedestrian connectivity/permeability network is achieved across the site ;
 - Adequate turning facilities are provided;
 - Traffic/parking control restrictions will be put in place;
 - Any requirement to provide access to the rear garages of the existing properties along Hood Avenue is maintained.
 - Utility equipment beneath the highway will be diverted (or alternative arrangements made to ensure continued access to equipment).
- 6.6.57. The current route from Hood Avenue also provides access to rear garages which lie outside of the development site boundary. The stopping up of Coverack Close will create issues pertaining to rights of access for the existing neighbouring properties. Although the TA suggests that no access needs to be retained to the rear garages, there is no evidence to demonstrate that rights of access to these existing properties does not have to be maintained. This will need to be satisfactorily addressed prior to any further discussion on stopping up can go ahead.

Summary

- 6.6.58. It is recognised that having regard to adopted policy, the current scheme provides slightly less parking than that which would normally be considered appropriate. Weight however can be given to the need to optimise development on suitable sites to meet housing need together with the mix and tenure of the housing. It is also recognised that the mitigation identified has the potential to offset any under-provision and there is scope to review parking provision in certain areas as the scheme progresses towards implementation. Consequently, subject to additional information being provided, as highlighted above and mitigation measures delivered to provide the Local Planning Authority with some level of comfort on the potential impacts, the development proposal should on balance, not have a significant detrimental impact on the free flow and safety of vehicular and pedestrian traffic and on-street parking provision on the surrounding roads.

6.7. Sustainable Design and Construction

Contamination

- 6.7.1. Sufficient information has been provided with regards to contamination. Recommendations are provided within the submitted *Desktop Study and Ground Investigation Report*, which will be considered together with the conditions suggested by the Environmental Health Officer.

Air Quality

Construction Dust Assessment

- 6.7.2. An *Air Quality Assessment* has been submitted in support of the application. The entire borough was designated as an Air Quality Management Area (AQMA) in 2001 as a result of the borough not meeting with the Government's air quality objective for annual mean nitrogen dioxide and daily means PM₁₀ by the specified dates.
- 6.7.3. The development has the potential to generate dust and emissions during the construction phase due to on-site activities, construction activities and exhaust emissions from construction vehicles and plant. Due to the proximity of high-sensitivity receptors to the proposed site boundary, the site is classified as high risk with respect to dust soiling and medium risk with respect to human health effects.
- 6.7.4. Through the implementation of a coordinated Construction Environmental Management Plan and / or Dust Management Plan, all impacts associated with construction phase activities are likely to be mitigated to negligible. It is important that all potential dust-generating activities and locations are identified prior to commencement of work. Dust should be controlled at source by the use of appropriate plant handling techniques, good maintenance, and housekeeping. A list of recommended mitigation measures can be found in Appendix C of the *Air Quality Assessment* and will be conditioned accordingly.
- 6.7.5. All construction plant used at the proposed redevelopment must comply with the latest emission standards for non-road mobile machinery as detailed in guidance issued by the Mayor of London. This will ensure that air quality impacts associated with exhaust emissions from these vehicles will be negligible.

Air Quality Neutral Assessment

- 6.7.6. NO_x emissions from the proposed energy centre are estimated to meet the Building Emissions Benchmark calculated in accordance with the methodology prescribed within the Mayor of London's Sustainable Design and Construction SPG. As such, the redevelopment can be considered to be air quality neutral with regard to building emissions.
- 6.7.7. Road traffic emissions associated with the proposed redevelopment are estimated to be above the Transport Emissions Benchmark calculated in accordance with the methodology prescribed within the aforementioned SPG. As such, the redevelopment cannot be considered to be air quality neutral with regard to transport emissions. However, as discussed set out within the *Air Quality Assessment*, the estimated trip generation rate for the proposed development is considered to be worst-case as it is based on trips associated with houses rather than the flats which are proposed for this development. In addition, the estimated trip generation rate does not take account of measures included within the proposed development to reduce vehicle use / emissions including a green travel plan, the provision of bicycle storage and electric vehicle charging points.
- 6.7.8. The effect of the completed development on local air quality has been assessed and the results are summarised below:
- The proposed redevelopment is predicted to have negligible impacts on annual mean NO₂ concentrations at the twenty-three existing sensitive receptors included within the assessment. Predicted annual mean NO₂ concentrations, with

the proposed redevelopment in place, are predicted to achieve the national air quality objective at all modelled existing receptors, whilst no potential exceedance of the hourly mean NO₂ objective is predicted at any existing receptors.

- Predicted annual mean NO₂ concentrations at all proposed receptors are predicted to achieve the national air quality objective (i.e. 40 µg/m³).
- The proposed redevelopment is predicted to have a negligible impact on annual mean PM₁₀ concentrations.
- Predicted annual mean PM₁₀ concentrations at all proposed receptors are predicted to be well within the national air quality objective (i.e. 40 µg/m³) in all modelled scenarios.

Summary

- 6.7.9. The results of the air quality neutral assessment indicate that although the proposed development is considered air quality neutral in respect of building emissions. Transport emissions associated with the proposed development are not considered air quality neutral. However, this is based on the estimated trip generation rate for the proposed development which is considered to be worst-case and due to the proposed development replacing existing residential properties this change is unlikely to result in a significant effect on local air quality. Despite not being air quality neutral in accordance with the Mayor of London's Supplementary Planning Guidance on Sustainable Design and Construction, the resulting local air quality impacts are likely to be not significant.

Noise

- 6.7.10. To assist in the consideration of any potential noise impact, a *Noise Assessment* has been provided which has assessed the likely future noise climate on existing and future residents. Paragraph 123 of the NPPF considers noise impacts of development. It confirms that policies and decisions should aim to:
- avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;
 - mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;
 - recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and
 - identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.
- 6.7.11. The *Noise Assessment* confirms that for some areas of the development (facades exposed to traffic noise from Avenue Road and facades on the north corner of the development along Cowper Gardens), windows would need to remain closed in order to achieve the BS 8233:2014 / WHO internal ambient noise criteria for residential spaces. When windows are opened (e.g. for purge ventilation / temperature control) then internal ambient noise criteria for day and night-time periods may be exceeded, however this will be at the discretion of the room occupant.

- 6.7.12. The BS 8233:2014 and WHO guideline values for external noise in garden areas can be achieved in areas away from Avenue Road (e.g. Cowper Gardens, Hood Avenue Green Space) although garden areas in close proximity to surrounding roads may require the use of acoustic screening, such as brick boundary walls or impervious boarded fencing.
- 6.7.13. Details of boundary treatments will be secured by condition.
- 6.7.14. Operational noise from plant and services can have a bearing on the amenity of existing, future, and neighbouring occupiers. Whilst the details of plant and services have not been finalised, they should not exceed the recommended operational noise limits set out in Table 7.1 of the *Noise Assessment*.
- 6.7.15. Some noise and disturbance to existing adjoining residents is inevitable during the construction phase. The submitted *Outline Demolition Statement Including Outline Demolition Traffic Management Plan* provides some detail of the proposed methodology to minimise sound generated by demolition and construction works. This would include, amongst other measures, a restriction on hours of works, hoardings, monarflex covering on scaffolding, and engagement with local residents.
- 6.7.16. Having regard to the above, it is considered that the development, subject to appropriate conditions, should not unduly impact on the amenity of future or neighbouring occupiers with regard to noise and disturbance. The development is considered to comply with Policy 7.15 of the London Plan, Core Policy 32, Policy DMD68 of the Development Management Plan

Biodiversity / Ecology

- 6.7.17. Policy 7.19 of the London Plan (“Biodiversity and access to nature”) requires development proposals to make a positive contribution, where possible, to the protection, enhancement, creation and management of biodiversity. Core Policy 36 of the Core Strategy confirms that all developments should be seeking to protect, restore, and enhance sites. Policy DMD79 advises that on-site ecological enhancements should be made where a development proposes more than 100sqm of floor space, subject to viability and feasibility.
- 6.7.18. The proposal involves the demolition of all existing structures on the site. An ecological appraisal (“Preliminary Ecological Statement”) has been submitted and as part of the appraisal, a Phase 1 Habitat and Protected Species Survey was undertaken in order to establish the ecological value of the site. In addition, a desk study and walkover survey was undertaken in accordance with a Phase 1 Habitat Survey methodology. The following results are provided:
- Whilst records indicate the presence of bats and hedgehogs within a 1km radius of the site, neither is present on the site.
 - None of the trees on site would provide suitable roosts and emergence surveys have established that bats are not using the site as a roosting location.
 - Although some dense scrub is present around the margins of the Hood Avenue open space, these are isolated and therefore with regards to foraging bats, are not a notable consideration.
 - There are no records of badgers and the site is not suitable topography for badger sett creation.
 - There is limited terrestrial habitat on site and no water bodies to provide a suitable breeding habitat for great crested newts or other common amphibians.

- Reptiles, stag beetles and common invertebrates are not a notable consideration due to the site offering unsuitable habitat, foraging and refuse areas.
- Several species of birds are recorded within the 1km survey area but notably, swifts are recorded as nesting on site. Sparrows may also be nesting in gaps behind soffits.
- Four species of invasive plants (Japanese knotweed, cotoneaster species, false-acacia and butterfly-bush) are present on site and are therefore a notable consideration.

6.7.19. Recommendations have been made within the Ecological Statement to deal with the flora and fauna on site and to improve the ecological value of the site by ensuring that suitable habitats are provided and appropriate precautions are provided throughout demolition and construction. These are reflected in the suggested conditions.

6.7.20. Having regard to the above, the proposed development will not unduly impact upon the existing ecological value of the site but through measures proposed and to be secured by condition, will serve to enhance the value of the site in accordance with policy 7.19 of the London Plan, CP36 of the Core Strategy and policy DMD79 of the Development Management Document.

Trees

6.7.21. An Arboricultural Report and Tree Condition Survey has been provided to help inform the decision making process insofar as any potential impacts from the development proposal on trees within the site and immediately adjacent.

6.7.22. The majority of existing trees within the site are of a generally poor quality and/or low amenity value. They should not be considered a significant constraint to development and the proposed landscape master plan suggests that the trees to be re-planted will comprehensively mitigate the tree removals and significantly enhance the locality.

6.7.23. Notwithstanding the above, proposed Blocks E1 and E2 are located close to third-party owned Oak trees (trees T69 and T70 on the submitted Tree Removals Plan) which are protected by a Tree Preservation Order. In addition there are two mature ash trees of good quality and significant amenity value located in a large raised grass verge directly where block E3 is proposed. The trees will need to be removed to develop this area.

6.7.24. Policy DMD80 advises the following:

“All development including: subsidiary or enabling works that involve the loss of or harm to trees covered by Tree Preservation Orders, or trees of significant amenity or biodiversity value, will be refused.

Where there are exceptional circumstances to support the removal of such trees, adequate replacement must be provided”

6.7.25. As discussed above, the rationale for locating building E3 at the end of a street is to provide a clear terminus, although this could equally be achieved with appropriate landscaping. The positioning of Blocks E1 and E2 should not impact the roots of the Oak trees, however pressure will arise from potential future occupiers of those blocks to prune those trees as the canopy will already extend to within 1m to 3.5m of the proposed buildings, particularly as these trees are relatively young (approx.100yrs).

6.7.26. The close proximity of the above buildings to the neighbouring trees will severely limit their potential future growth. The long-term impact on these trees and their environmental benefit, in addition to the Ash trees to be removed, must be weighed against the need for additional housing in the borough. Moreover, there is more than sufficient compensatory planting for the trees which are to be removed, having regard to DMD80 and 81 of the Development Management Document.

Energy

6.7.27. Chapter five of the London Plan sets out a comprehensive range of policies to underpin London's response to climate change. This is supported by policies within the Core Strategy and the DMD. An Energy Statement has been provided, detailing the energy strategy for the estate.

Decentralised Energy

6.7.28. An energy centre will be provided within the lower ground floor of Block G1. An energy centre is a building or part of a building where plant is located to provide energy and heating for a given development and potentially to a wider area. There are some significant benefits to be made, such as improving overall efficiency from larger scale plant whereby a scheme's energy base-load can be met by combined heat and power (CHP) technology, maximising the efficiency of primary fuel use and providing reduced costs to consumers. In addition, it negates the need to provide, for example, individual boilers to each building.

6.7.29. The estate will be a satellite site for the Lee Valley Heat Network ("LVHN"), although due to costs and increased heat losses to the network, Lousada Lodge will not be included. The proposed strategy is to provide a site-wide heat network with capacity for expansion to serve a wider network. All building uses within the New Avenue development will be connected to the site wide heat network served by a single energy centre located within Block G1. The energy centre has been designed to allow for expansion, through the inclusion of an additional CHP and boiler.

6.7.30. The proposed design approach is to minimise energy consumption through passive design, fabric performance and energy efficiency measures. Consideration has been given to the passive design of the scheme, including the orientation and layout of the buildings and units, glazing areas and stacking of balconies for shading.

6.7.31. The buildings will be designed to achieve a high standard of air tightness, reduced thermal bridging, and good thermal performance to reduce heat loss, thereby saving energy and reducing CO₂ emissions.

Renewable Energy

6.7.32. A range of potential renewable energy technology options have been considered. Photovoltaics was selected as the most appropriate technology for the site on the basis that it would not conflict with the site-wide heat network and has the potential to deliver the CO₂ savings required to meet the targets set for the development.

6.7.33. In addition, the higher confidence in delivering the CO₂ savings over the lifetime of the system, the relative simplicity of installation and the financial benefits all made PV the most attractive option for delivering on-site renewable energy.

6.7.34. The proposed approach is to install several PV arrays across the site. Based on the modelling undertaken it has been estimated that a total of 1,280sqm of PV panels will enable the 35% CO₂ reduction target to be achieved and that there is sufficient roof space to accommodate this across the development. A condition is proposed to secure the details and ongoing maintenance of the PV panels.

Drainage

6.7.35. London Plan policies 5.12 and 5.13 require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 (“Managing flood risk through development”) confirms the Council’s approach to flood risk, inclusive of the requirement for SuDS in all developments. Policies DMD59 (“Avoiding and reducing flood risk”) confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere and that Planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in unacceptable levels of flood risk on site or increase the level of flood risk to third parties. DMD61 (“Managing surface water”) requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.

6.7.36. A Flood Risk Assessment (FRA) has been provided in support of the application. The Environment Agency Flood Risk maps indicate that the proposed development site is situated in Flood Zone 1. Moreover, the sequential test is satisfied for a site located in Zone 1 and where safe access and egress is available. Table 3 of the NPPF confirms that all land uses are appropriate in flood Zone 1 and therefore an Exception Test is not required.

6.7.37. The risk of flooding from different key sources has been assessed and all but one source are deemed to be of low risk. The only residual risk is that of overland surface water flooding. To ensure that the flooding levels are not increased for existing properties neighbouring the development, flood routing and two dry storage ponds will be provided to replace the capacity lost by the construction of new properties. The FFL’s and adjacent footpaths for the new properties are set a levels sufficiently high to ensure they are safe from flooding and that a safe means of access will be maintained for pedestrians even in the case of an extreme flood event. Where required, feature walls and structures will be designed in such a way that they route the flood water to protect properties from flood water.

6.7.38. A range of sustainable drainage measures have been incorporated into the scheme, which will need to be secured by condition.

Site Waste Management

6.7.39. Policy 5.16 of the London Plan has stated goals of working towards managing the equivalent of 100% of London’s waste within London by 2026, creating benefits from waste processing and zero biodegradable or recyclable waste to landfill by 2026. This will be achieved in part through exceeding recycling and reuse levels in construction, excavation and demolition (“CE&D”) waste of 95% by 2020.

6.7.40. In order to achieve the above, London Plan policy 5.18 confirms that through the Local Plan, developers should be required to produce site waste management plans to arrange for the efficient handling of CE&D. Core Policy 22 of the Core Strategy states that the Council will encourage on-site reuse and recycling of CE&D waste. Policy DMD52 requires a Site Waste Management Plan to be submitted for all major developments.

6.7.41. A *Framework Site Waste Management Plan* has been provided which outlines the broad methodology to be employed to comply with adopted policy and with regard to the handling of “controlled waste” such as contaminated soil, asbestos or Japanese Knotweed.

6.7.42. A condition is proposed to secure this.

6.8. **Viability**

6.8.1. The proposal does not meet with the Core Strategy in terms of the provision of affordable housing on site. The level of provision has been tested through an independent review of the scheme, which does conclude that the development provides the maximum level of affordable housing and an appropriate mix of units.

6.8.2. It should be noted that the viability review was undertaken on a total provision of 412 units. The scheme before members is 408 units. The loss of four units overall following the removal of the mews street and the fourth floor of Lousada Lodge (and the subsequent reconfiguration of the units therein) does not affect the overall conclusions of the viability review.

Education / Childcare

6.8.3. The scheme will be liable for education and childcare contributions for the net increase of units on site, in accordance with Tables 7.3 and 7.5 of the S106 SPD. These would need to be secured via a s106 legal agreement.

Employment and Training

6.8.4. Core Policy 16 of the Core Strategy confirms the commitment of the Council to promote economic prosperity and sustainability in the Borough through a robust strategy to improve the skills of Enfield’s population. One initiative, through the collaboration with the Boroughs of Haringey, Broxbourne, Epping and Waltham Forest, is to promote skills training for local people.

6.8.5. Details of a Local Employment Strategy could be secured by legal agreement. The Strategy should set out how the development will engage with local contractors / subcontractors, the number of trainees to be employed on site and the number of weeks training will be provided.

Community Infrastructure Levy (CIL)

6.8.6. The Mayoral CIL is collected by the Council on behalf of the Mayor of London. The amount that is sought for the scheme is calculated on the net increase of gross internal floor area multiplied by an Outer London weighting (£20/sqm) and a monthly indexation figure (272 for October 2016).

6.8.7. The development is CIL liable for the construction of 42,624sqm of new residential floor space, less the existing floorspace to be demolished (18,765sqm) and the 10 additional affordable units which are eligible for relief.

6.8.8. The Council introduced its own CIL on 1 April 2016. The money collected from the levy (Regulation 123 Infrastructure List) will fund rail and causeway infrastructure for Meridian Water. For residential CIL, the site falls within the higher charging rate zone (£120/sqm).

6.9. Section 106 / Legal Agreement

- 6.9.1. Section 106 contributions can still be sought for items of infrastructure not identified on the Regulation 123 list. A legal agreement will be required to secure the obligations as set out below. A 5% management fee will also be incurred as per the S106 SPD.
- 6.9.2. Having regard to the content above, it is recommended that should planning permission be granted, the following obligations / contributions should be secured through a legal agreement:
- The securing of 140 units in total for on-site affordable housing provision
 - Up to 50% rented
 - Up to 50% shared ownership
 - Contribution towards education provision
 - Contribution towards childcare provision
 - Requirement for same architects or architects of equal quality to either provide all construction drawings or a budget is allocated to allow them to review the drawings.
 - £ 160,000 towards the implementation of traffic calming measures along Avenue Road, including the provision of a raised table at the junction with the new access and Orchard Avenue
 - £98,000 towards the provision of sustainable transport measures for residents of the development
 - £20,000 towards providing better links from the site to main cycle routes as part of the Cycle Enfield project
 - £3,620 towards travel plan monitoring
 - Travel Plan
 - Parking Management Plan
 - S278 Legal Agreement (for all highways improvements and highway works across the site)
 - Stopping Up Order (A plan showing all of the areas of existing highways to be stopped up)
 - Local Employment Strategy
 - Securing the local sourcing of labour
 - Securing the local supply of goods and materials
 - Securing on-site skills training
 - 5% management fee

6.10. Other Matters Raised

- 6.10.1. Concerns relating to property values are not material planning considerations. However, the cause for that concern, for example, increased overshadowing or loss of outlook, are matters that can be addressed in the scheme design.
- 6.10.2. Matters relating to ecology have been addressed above and where necessary by condition.
- 6.10.3. The phasing of the development is to be secured by condition.
- 6.10.4. With regard to the strain on existing infrastructure, Thames Water is satisfied with the proposal (subject to condition). Contributions are also being secured towards necessary infrastructure.

7. Conclusion

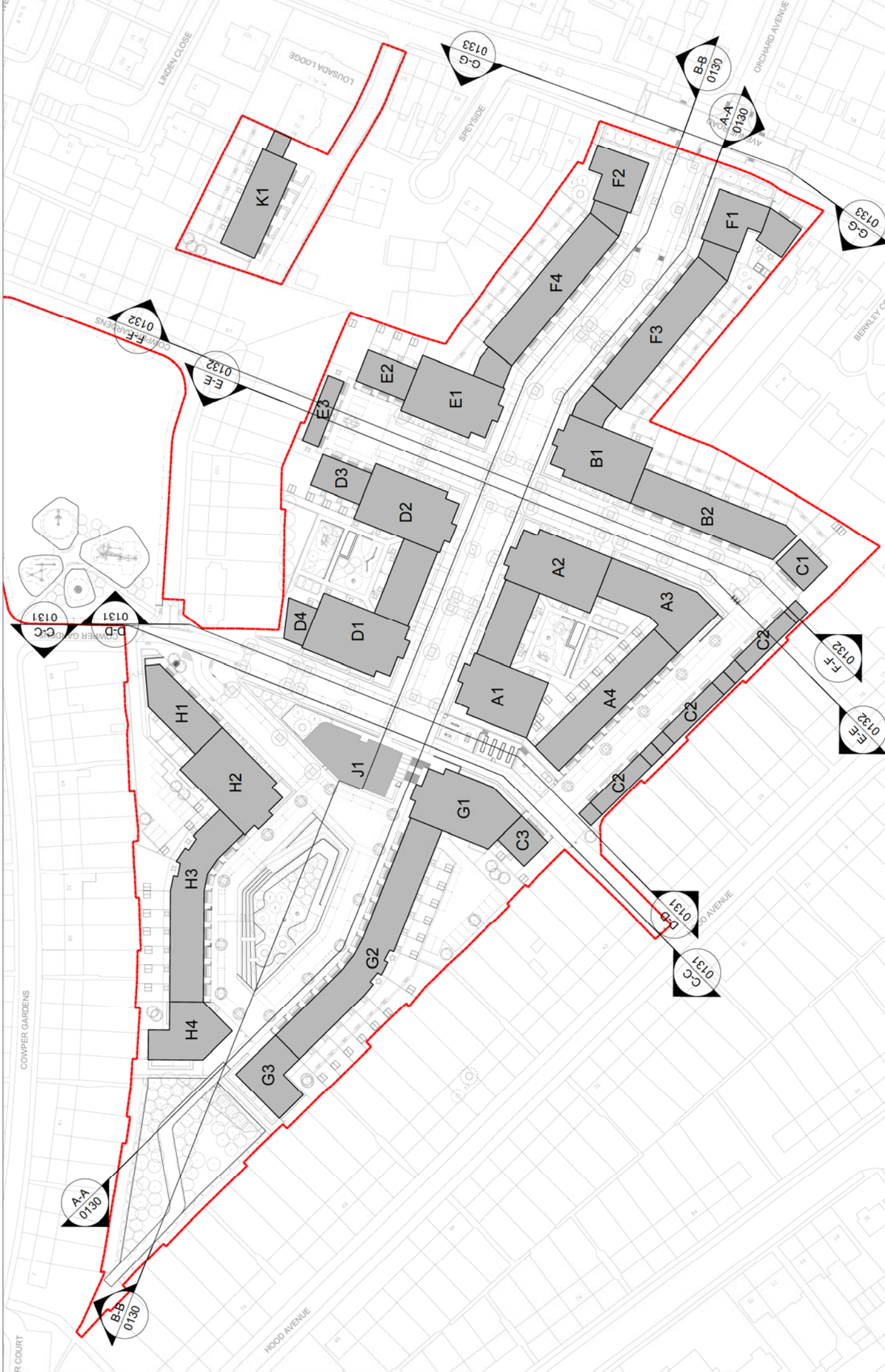
7.1. Having regard to all of the above, it is considered that on balance, planning permission should be granted for the following reasons:

1. The proposed development would contribute to increasing London's supply of housing, having regard to Policies 3.3, 3.4 & 3.14 of The London Plan, Core Policies 2, 4 & 5 of the Core Strategy, Policies DMD1, 3 & 4 of the Development Management Document, and with guidance contained within the National Planning Policy Framework.
2. The proposed development, due to its design, size, scale and siting, on balance, does not unduly detract from the character and appearance of the street scene or the surrounding area having regard to Policies 3.5, 7.1, 7.4 & 7.6 of the London Plan Policy, Core Policy 30, DMD Policies 7, 8, 9 and 10 of the Development Management Document, and with guidance contained within the National Planning Policy Framework, and with guidance contained within the National Planning Policy Framework.
3. The proposed development, due to its siting does not, on balance, impact on the existing amenities of the occupiers of nearby properties in terms of loss of light, outlook or privacy and in this respect complies with Policy 7.6 of the London Plan, Core Policy 30, DMD Policy 10 of the Development Management Document, and with guidance contained within the National Planning Policy Framework.
4. Having regard to conditions attached to this permission, the proposal, on balance, makes appropriate provision for servicing, access, parking, including cycle parking and visibility splays, and in this respect complies with Policies 6.3, 6.9, 6.12 & 6.13 of the London Plan, DMD Policies 45 and 47 of the Development Management Document, and with guidance contained within the National Planning Policy Framework.
5. The proposed development, by virtue of measures proposed and conditions imposed, will contribute to the mitigation of and adaptation to climate change, having regard to Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 & 5.13 of the London Plan, Core Policies 20, 32 and 36, DMD Policies 49, 51, 53, 58, 59 and 61 of the Development Management Document, and with and with guidance contained within the National Planning Policy Framework.

8. Recommendation

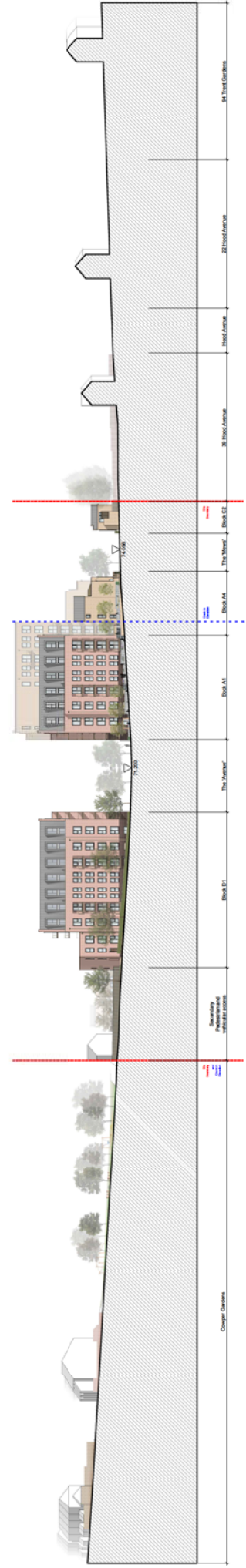
- 8.1. That following referral to the Mayor of London and no objections being raised, and the securing of a Legal Agreement to secure the obligations as set out above, planning permission be **GRANTED** subject to conditions.
- 8.2. That officers be granted delegated authority to finalise the precise wording of conditions to cover the issues identified within the report and summarised below:
 1. Approved plans – revised
 2. Time limited permission
 3. Details of access and junction
 4. Details of levels (proposed)
 5. Details of a phasing plan
 6. Details of a Construction Site Waste Management Plan
 7. Securing mix / size / layout of units

8. Details of materials
9. Material samples / sample panels on site
10. All dwellings to be accessible / adaptable
11. Securing a minimum 10% of units to be wheelchair accessible
12. Details of external lighting
13. Details of hard surfacing
14. Parking / serving facilities
15. Details of location and design of petrol / oil interceptors
16. Number / location of disabled parking bays
17. Private vehicles only – parking areas
18. Number / location / design of electric vehicle charging points
19. Closing up of redundant points of access
20. Gates to open inwards
21. Means of enclosure
22. Details of a Construction methodology / Traffic management plan
23. Cycle storage
24. Details of refuse storage / recycling facilities
25. Energy efficiency
26. Details of zero / Low carbon technologies
27. Details of water efficiency
28. No additional fenestration
29. Obscure glazed / non-opening windows on flank elevations facing rear gardens
30. Restriction of permitted development rights
31. Restriction of use of flat roofs
32. Drainage Strategy
33. Verification report that drainage strategy has been implemented
34. Impact study – Existing water supply
35. Tree protection
36. Vegetation clearance outside of bird nesting season
37. Landscaping details
38. Ecological enhancements (inclusive of terrestrial mammals)
39. Details of Method Statement to deal with invasive non-native species
40. Management plan for communal amenity areas
41. Biodiverse roofs
42. Works to be undertaken in accordance with the recommendations within the *Desktop Study and Ground Investigation Report*
43. Works to be undertaken in accordance with the recommendations within the *Outline Demolition Traffic Management Plan*
44. Details of a mechanical ventilation strategy
45. Noise attenuation for plant
46. Details for communal satellite dish / TV antenna provision
47. Details of play space equipment to be provided





Site Elevation C-C



Site Elevation D-D



Site Plan - Elevation Key

Notes:
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 Dimensions are given in metres unless otherwise stated. Check to be made in
 conjunction with other relevant construction information.
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 Drawing to be used in conjunction with other specifications.

Legend:
 Existing Buildings
 Proposed Buildings
 Proposed Landscaping
 Proposed Streets
 Proposed Amenities
 Proposed Services
 Proposed Utilities
 Proposed Other



Site Elevation E-E



Site Elevation F-F



Site Plan - Elevation Key

