

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 21 February 2017

Report of
Assistant Director,
Regeneration & Planning

Contact Officer:
Andy Higham
Sharon Davidson
Mr Sean Newton

Ward:
Cockfosters

Ref: 16/04133/FUL

Category: Full Application

LOCATION: Blackhorse Tower, Holbrook House And Churchwood House, 116 Cockfosters Road, EN4 0DY,

PROPOSAL: Redevelopment of site to provide a total of 164 residential units (including 54 affordable units) with basement and surface car parking, comprising partial demolition and refurbishment of Black Horse Tower and construction of an additional floor to provide 88 residential units within a 10-storey block, demolition of Holbrook House and Churchwood House, erection of a 7-storey block of 44 residential units (Block B) and erection of a part 4, part 7-storey block (Block C) providing flexible uses at ground and first floor levels (2,492 sq.m.), a 64-bed hotel (2770 sq.m) and 32 residential units, together with a central courtyard rooftop garden with play area, a roof level podium garden and landscaping of Cockfosters Green.

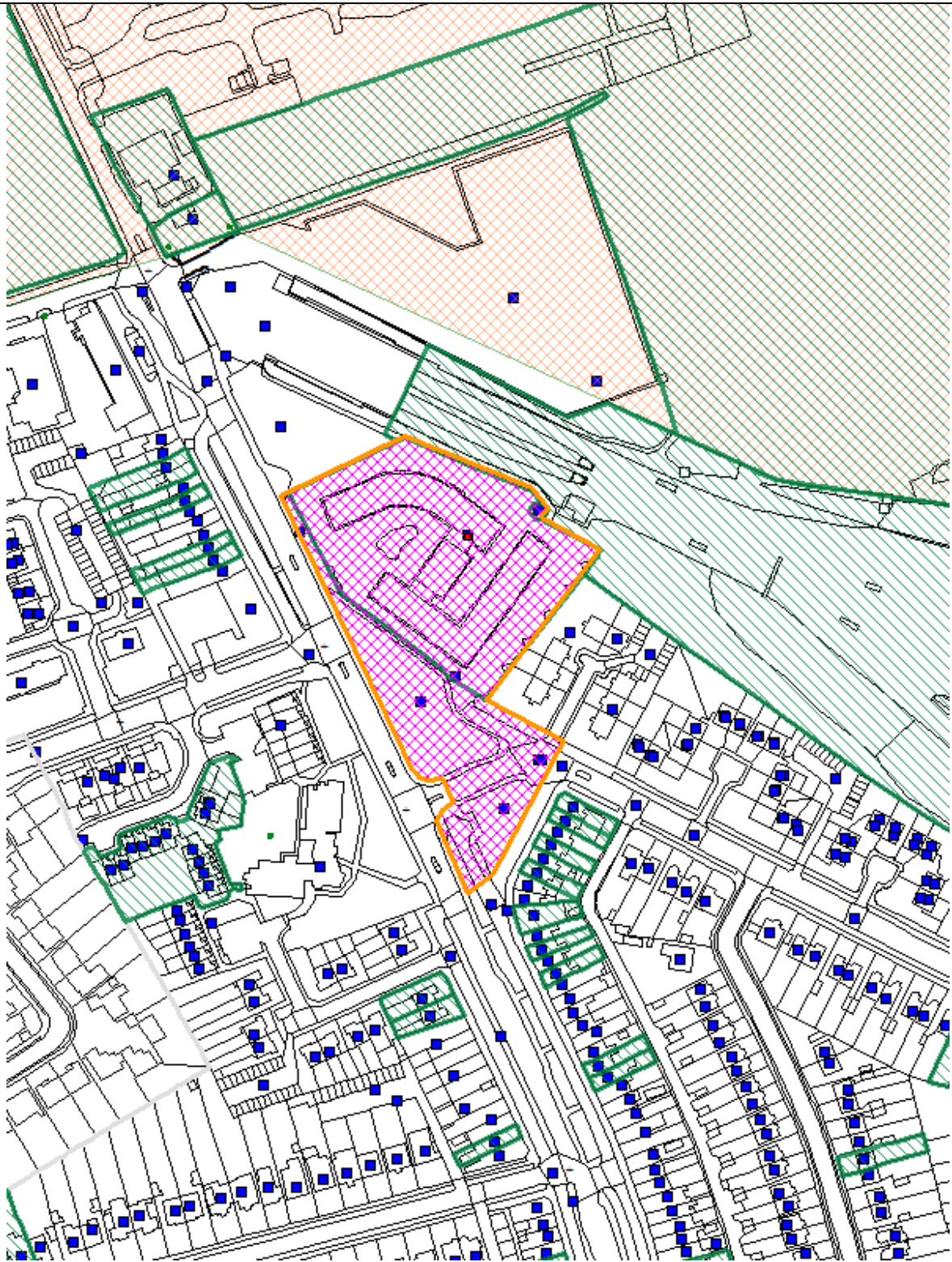
Applicant Name & Address:
Hermes Property Unit Trust

Agent Name & Address:
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17 Gresse Street
W1T 1QL

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, planning permission be **GRANTED** subject to conditions.

Ref: 16/04133/FUL LOCATION: Blackhorse Tower, Holbrook House And Churchwood House,



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Scale 1:1250

North



1. Site and Surroundings

- 1.1. The application site, on the western side of Cockfosters Road, comprises of three office buildings – the largest of which, Black Horse tower, is 9-storeys. The two other buildings (Holbrook House and Churchwood House) are both 3-storeys.
- 1.2. Immediately to the rear (east) of the site is a London Underground line (Piccadilly) which terminates at Cockfosters Station, sited approximately 65m north of the site on Cockfosters Road.
- 1.3. Immediately west of the tube line and north of the station is Trent Country Park, which lies within the Trent Park Conservation Area and within the Metropolitan Green Belt.
- 1.4. The site lies within the Cockfosters Large Local Centre.

2. Proposal

- 2.1. Permission is sought for the redevelopment of the site to provide a total of 164 residential units (including 54 affordable units) with basement and surface car parking (148 spaces), comprising partial demolition and refurbishment of Black Horse Tower and construction of an additional floor to provide 88 residential units within a 10-storey block (Block A), demolition of Holbrook House and Churchwood House, erection of a 7-storey block of 44 residential units (Block B) and erection of a part 4, part 7-storey block (Block C) providing flexible uses at ground and first floor levels (2,492 sqm), a 64-bed hotel (2770 sqm) and 32 residential units, together with a central courtyard rooftop garden with play area, a roof level podium garden and landscaping of Cockfosters Green. A total GIA of 27,253sqm is proposed.
- 2.2. The proposed development involves the part demolition, refurbishment and conversion of Black Horse Tower (referred to as Block A) from office use (Use Class B1a) to residential use (Use Class C3), including the provision of a roof top single storey extension to utilise the height of the existing lift overruns, to create a total of 78 residential (market) and 10 affordable residential units with a mixture of dwelling types, including 1, 2, 3 and 4 bedroom apartments.
- 2.3. The development includes the total demolition of the L Shaped complex, comprising Churchwood House and Holbrook House to provide two new blocks (referred to as Blocks B and C respectively), centred around a podium at ground and first floor levels to tie into the existing Black Horse Tower building and the two proposed Blocks (B and C).
- 2.4. Beneath the central element of the proposed podium is a proposed basement level car parking area, which will house 103 spaces including 9 disabled spaces, along with secure cycle stores for 190 spaces and associated access lift and stair cores. This basement level will also house the tank rooms for Blocks A, B and C.
- 2.5. At ground floor level, the central portion of the podium includes a servicing area with additional parking (45 spaces including 11 disabled spaces) and three service bays capable of catering for a range of service vehicles up to the maximum size rigid vehicle (8 to 10m in length). Allowance has also been made within the service area for coach and taxi drop off/pick up.

- 2.6. Block B will comprise a seven storey block which will deliver the majority of the Site's affordable housing component, comprising a total of 44 units, ranging from 1, 2 and 3 bedroom apartments. The entrance to Block B fronts onto Norfolk Close and will include direct access to the central courtyard to the rear.
- 2.7. Block C fronts onto Cockfosters Road and provides a mixture of uses and activity in the form of a range of flexible uses at ground and first floor, including the potential for retail, restaurants/cafes, a doctors' surgery and offices. Block C will also include a 64 bedroom hotel and 32 residential units (comprising a mixture of dwelling types ranging from 1, 2 and 3 bedroom apartments).
- 2.8. The proposals include enhancements to Cockfosters Green, retaining all of the significant trees, whilst providing enhancements to the ground level planting, pathways, lighting, and street furniture.

3. Relevant Planning Decisions

- 3.1. There is a long planning history associated with the site. The most relevant is set out below:
- 3.2. In February 2016, it was determined that an Environmental Impact Assessment (ref: 16/00163/SO) was not required for the conversion and extension of Black Horse Tower (Block A) from office to residential uses together with demolition of Holbrook and Churchwood Houses and construction of two buildings (Blocks B and C) for residential uses, a hotel and flexible retail, GP surgery and gym and office use, comprising a total of 167 residential units across the site (including affordable units), 1107sqm GIA flexible retail floorspace (A1, A2, A3), 874sqm flexible community, office and retail floorspace (D1, B1, A3) 616sqm flexible community and office floorspace (D2, B1) and a 64-bed hotel (C1) together with up to 205 car parking spaces.

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. No objections are raised because it is considered that there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality. Conditions are proposed relating to noise, dust, and contamination.

Traffic and Transportation

- 4.1.3. No objections are raised subject to conditions and contributions towards public realm improvements.

Tree Officer

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

- Most of the trees to be removed are category 'C' trees, in accordance with BS5837:2012, and should not be considered a constraint to development.
- There are some category 'B' lime trees of moderate value on the East side of the development adjacent to the existing and proposed car parking areas that are to be removed in order to facilitate development.
- There are no currently 'tree covered' areas that will not be replaced by better quality tree planting.
- The group of trees on the north boundary (G30) is located outside of the site. Removal of these will require the permission of the landowner.
- A preliminary Tree Protection Plan has been submitted to protect existing trees, however, this lacks some detail, and a comprehensive TPP will be required for submission under condition.
- A new path network on the existing green adjacent to mature trees will need to be constructed on a no dig basis.
- Large specimens are to be planted to provide an instant impact and tree pit design detail shown is modern and shows structural cellular crate systems beneath car parking areas where appropriate to ensure an adequate rooting environment beneath hard surfaces. Again an appropriate landscaping condition will be required.

Metropolitan Police Service

- 4.1.5. 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. This should be secured by condition. In addition, the applicant should seek the advice of the Police Designing Out Crime Officers (DOCOs). It has also been advised that the amended plans, which have reduced the size of the basement, do not raise any new concerns.

Greater London Authority

- 4.1.6. 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 site is supported, the Mayor considers that the application does not yet fully comply with the London Plan for the following reasons:
 - The proposal is only providing 35% affordable housing.
 - The provision of on-site play space for 0-5 year olds is short of the requirement. A detailed play strategy should be required.
 - A 'safe zone' for pedestrians only should be delineated in the shared surfaces.
 - TfL require operational access to be safeguarded.
 - The overall parking ratio should be reduced.
 - With regard to climate change mitigation, the development falls short of the requirement for the non-domestic (27%) and domestic (24%) uses. Options to increase savings should be explored.

Thames Water

- 4.1.7. The following comments have been received:

- We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.
- A Groundwater Risk Management Permit from Thames Water will be required.
- With regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.
- With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer.
- With regard to water supply, this comes within the area covered by the Affinity Water Company.
- No piling shall take place until a piling method statement has been submitted to the LPA for approval.

London Underground

- 4.1.8. It has been advised that whilst there are no objections in principle, there are a number of potential constraints being in close proximity to railway infrastructure. A series of measures are proposed to be included in a condition.

London Fire and Emergency Planning Authority

- 4.1.9. It has been advised that the Brigade are satisfied with the proposals for firefighting access
- 4.1.10. Any further comments received will be reported at Committee.

Public Response

- 4.1.11. 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 letters from the Southgate District Civic Trust and FERRA, have been received raising some or all of the following points:

Impact on character of the area

- The site has been under-used for many years and there is a case for economic development, especially with close proximity to the Underground service.
- Residents generally accept that some densification will result from any development scheme; the degree and sustainability in this case are core questions for the community and its acceptance or otherwise of this development.
- Insufficient amenity space provision.
- The prominent position of this site calls for architecture of distinction, character and variety such as would enhance the village scene, but there is none.
- Development is too high / should be reduced in scale.
- The tall block is already an eyesore visible for miles around and out of keeping with the locality. Another floor is inappropriate, particularly as the lower blocks are to be replaced with more floors.
- The proposed add-on to the left-hand side of Black Horse Tower, and the proposed new high buildings along Cockfosters Road in front of Black Horse Tower, will have an adverse impact on the view of and integrity of Black Horse Tower.
- Black Horse Tower is very much a local landmark, and a dramatic piece of architecture. Obscuring it will change the character of the area for the worse.

- The existing unattractive building is already too high for the area. It could be demolished entirely and replaced with sensitively designed mix of office space, public facilities (a new doctor's surgery / health centre) and affordable housing.

Impact on amenity

- Density has even been pursued to the point that views available to residents from the main tower looking west are of the lowest quality - inappropriate and discordant for a suburban development.
- Increase in pollution.
- Overlooking.
- Loss of privacy.
- Loss of light.
- Noise and disturbance.

Highways matters

- Cockfosters Rd is a vital connection to the M25 and traffic flows morning and evening will be significantly impacted, especially at the Westpole Ave / Cockfosters Rd junction.
- Traffic is frequently jammed every day from the Cat Hill roundabout going towards Potters Bar. We also have frequent queues from the top of Cat Hill returning from Potters Bar all the way to Cockfosters.
- Loss of parking.
- Inadequate parking provision.
- Increase in traffic.
- Inadequate access.
- Double yellow lines are needed on the Cockfosters Road, top of Westpole Avenue and Mount Pleasant as cars park on corners making it dangerous for pedestrians.
- Traffic refuges in Cockfosters Road are not sufficient for pedestrian safety particularly as more children will need to cross that road.
- Although the development is adjacent to a transport hub, it lies on the edge of London. The decision to apply an arbitrary 50 percent reduction to London Plan guidelines on maximum residential parking spaces (as has been done) is hard to rationalise. Similarly, to suggest that little or no parking spaces will be needed for the hotel is also questionable.
- The existing supermarkets and restaurants at Cockfosters, particularly those directly opposite the proposed development, already create parking and traffic problems as the service road is congested.
- Although the proposed health centre would be a welcome addition, to introduce further retail units and a health club on the eastern side, without further service roads and parking bays, would further compromise the parking and traffic in this congested area.
- The traffic survey is not valid as office was open basically mon-fri. homes have cars and deliveries 24 hr 365 days a year so will generate far more traffic particularly at weekends.
- Double yellow lines should be introduced

Any other matters raised

- Affect local ecology.

- Although it is fashionable to claim employment gain, there is in fact no notified need of further employment in this area, as features in Hermes' submission.
- There is also no demonstrated need for either a hotel or further retailing in Cockfosters Village.
- Increased danger of flooding.
- Loss of property values.
- This development would add to the already stretched resources in the area such as schools and health services.
- No objection to a change of use of the office buildings, but feel somewhat saddened that apparently Cockfosters is unable to attract sufficient tenants for these buildings.
- Influx of new residents without adequate planning as to how the infrastructure is going to be negatively impacted is unwise.
- I believe no EIA was undertaken by or for 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 (2016)
Community Infrastructure Levy Regulations 2010
Trent Park Conservation Area Character Appraisal (2015)
Trent Park Conservation Area Management Proposals (2015)
Enfield Characterisation Study
Enfield Council Tall Buildings 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. However, this must be weighed against any impact on adjacent heritage assets and Green Belt, the loss of employment, 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.

6.1.2. Located within the Cockfosters Large Local Centre, the propose mixed use development is considered acceptable in principle.

6.2. **Heritage Considerations**

Statutory background

6.2.1. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("Listed Buildings Act") confirm that special attention shall be paid to the desirability of preserving a listed building or its setting (s.66) and preserving or enhancing the character or appearance of that area (s.72). As confirmed by the Court of Appeal (Civil Division), the decision in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137, it was concluded that where an authority finds that a development proposal would harm the setting of a listed building or the character and appearance of a conservation area, it must give that harm "*considerable importance and weight*". Further case law has reconfirmed the Barnwell decision and the considerations to be undertaken by a planning authority: *The Forge Field Society & Ors, R v Sevenoaks District Council* [2014] EWHC 1895 (Admin), *Pugh v Secretary of State for Communities and Local Government* [2015] EWHC 3 (Admin).

National Guidance

- 6.2.2. Section 12 of the National Planning Policy Framework (Conserving and enhancing the historic environment) advises Local Planning Authorities to recognise heritage assets as an “irreplaceable resource” and to “conserve them in a manner appropriate to their significance” (para.126). Paragraph 132 goes on to say LPAs need to consider whether a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset. Proposals that lead to substantial harm to or a total loss of significance of a designated heritage asset should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or it meets with the test identified at paragraph 133. Where a development will lead to less than substantial harm, the harm is to be weighed against the public benefits of the proposal, including securing its optimum viable use (para. 134). The NPPF states that heritage assets include designated heritage assets and assets identified by the Local Planning Authority (including local listing) as stated in Appendix 2.
- 6.2.3. At paragraph 137, LPAs are also advised to look for opportunities for new developments within conservation areas and within the setting of heritage assets to better reveal their significance. Where a proposal preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. The NPPG advises that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which the asset is experienced is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.
- 6.2.4. The NPPG also advises that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also advises that conservation is an “*active process of maintenance and managing change*”. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic, and environmental benefits.
- 6.2.5. Planning law requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise, as confirmed at s.38(6) of the Planning and Compulsory Purchase Act 2004 (“the 2004 Act”) and s.70(2) of the Town and Country Planning Act 1990 (“T&CPA 1990”). The Local Plan, as confirmed at s.38(2) of the 2004 Act, comprises of: the Spatial Development Strategy for Greater London (“London Plan”), the Enfield Plan Core Strategy 2010-2015 (“Core Strategy”) and the Development Management Document (“DMD”).
- 6.2.6. London Plan policy 7.8 (“Heritage Assets and Archaeology”) advises what boroughs should do at a strategic level to identify, preserve, and enhance London’s heritage assets. Policy CP31 (“Built and Landscape Heritage”) of the of the Core Strategy sets out a requirement that development should conserve and enhance designated and non-designated heritage assets. Policy DMD44 (“Conserving and Enhancing Heritage Assets”) states that development which fails to conserve and enhance the special interest, significance or setting of a heritage asset will be refused. The design, materials and detailing of development affecting heritage assets or their setting should conserve the asset in a manner appropriate to its significance.
- 6.2.7. There are several heritage assets upon which the impact of the development should be considered against:

- Cockfosters Underground Station
- Trent Park Conservation Area

6.2.8. What must therefore be determined is whether any of the elements proposed will harm the significance of the various heritage assets, having regard to the statutory requirement to give special attention to the desirability of preserving a listed building or its setting (s.66) and preserving or enhancing the character or appearance of a conservation area (s.72).

6.2.9. If any harm is identified, great weight must be given to that harm. Further to this, as advised above, if substantial harm or total loss to significance is identified, it would need to be established whether there are any substantial public benefits that would outweigh the identified harm or loss or the tests identified at para.133 of the NPPF are met. If there is less than substantial harm, the harm is to be weighed against the public benefits of the proposal, and for undesignated heritage assets, a balanced judgement must be made having regard to the scale of any harm or loss and the significance of the heritage asset. It should be noted that benefits are not limited to heritage benefits but to all material planning benefits capable of meeting the policy tests.

6.2.10. The proposal will have a greater or lesser impact on individual heritage assets. The factors for consideration will be:

- Proximity
- Visibility
- Compatibility of the proposal with the context and setting of the asset
- The significance of the asset
- The sensitivity to harm of the asset

Assessment against Heritage Assets

4411 COCKFOSTERS ROAD (East Side) Cockfosters LRT Station including platforms TQ 29 NE 19/1000 and platform canopies (grade II)

6.2.11. The list entry detail of Cockfosters Station (listed 26 May 1987) is as follows:

London Underground Station. 1933. Designed by Charles Holden. Brick and concrete entrance facades, with concrete framed train shed and booking hall. Flat roof. Main facade of 1 storey, long and low, with central square headed entrance and horizontal windows to either side with horizontal panes and metal glazing bars. End towerlets with London Underground sign finials. Cantilevered canopy over whole width. 'Prow' shaped booking hall. Train shed to rear with alternating wide and narrow bays to concrete frame, which is canted inwards above platform canopies to form a clerestory above the central track. Original light fittings, signs, etc.

6.2.12. The above list description indicates the principle elements worthy of listing. Whilst the development proposal will infill the rooftop of the Black Horse Tower, it is considered that this element would not result in any harm to the significance of the heritage asset because it is a minor addition to the existing bulky building. The roof addition will not be experienced from the station, inclusive of its entrance, and is therefore considered to have a neutral impact. The western end of Black Horse Tower will be provided with a 4-storey extension however this is considered to have a neutral impact.

6.2.13. The buildings replacing Churchwood and Holbrook House, whilst bigger and bulkier, are predominantly screened from the station by Black Horse Tower. Notwithstanding this, where it is possible to view Block C, there is sufficient distancing (together with the intervening mass of Black Horse Tower), for the station to not be challenged in any way by these elements.

Trent Park Conservation Area

6.2.14. The significance of the Trent Park Conservation Area derives from the following:

- Its historic association with the Enfield Chase, a hunting park attached to the manor of Enfield;
- Half of the total area is grade II listed on the Register of Parks and Gardens of historic interest;
- The topography continues to play a dominant role in determining the distinctiveness of the conservation area;
- The historic integrity of the estate has largely been preserved;
- The estate retains evidence of layers of change resulting from successive ownerships, uses, functions, and fashions; and
- Trees remain a very important element.

6.2.15. The only element of the site visible from the conservation area is Black Horse Tower. As identified previously, the building dominates views from a wide area, as demonstrated in the visuals provided with the “*Built Heritage, Townscape and Visual Impact Appraisal*”. However, there is no greater impact than currently exists.

6.2.16. Having regard to the statutory requirement to give special attention to the desirability of preserving a listed building or its setting (s.66) and preserving or enhancing the character or appearance of a conservation area (s.72) the proposal has been assessed against the identified heritage assets as set out above. It is considered that the development proposals will not lead to any harm to the designated or undesignated heritage assets having regard to Policy 7.8 of the London Plan, Core Policy 31, Policy DMD44 of the Development Management Document, and with section 12 of the NPPF. The development proposals must therefore now be assessed against any other material considerations, in accordance with s.38(6) of the 2004 Act and s.70(2) of the T&CPA 1990.

6.3. Green Belt Considerations

6.3.1. The NPPF confirms that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence (para.79). The development site, being outside of the Green Belt, does not conflict with Green Belt policy. However, The site is sits adjacent to it, therefore the provisions of DMD83 (“Development Adjacent to the Green Belt”) apply:

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

6.3.2. Black Horse Tower is an existing visually dominant feature within the surrounding area. Although the height of the building will not be materially different, the

development proposal infills the gap between the existing plant rooms at either end of the roof. However, the use of lightweight materials helps to alleviate any adverse visual impact, therefore there is no increase in visual dominance and intrusiveness. In addition, the distinction between the Green Belt and the urban area, together with existing views are maintained. It is considered that there is no conflict with DMD83.

6.4. Employment Use

- 6.4.1. Core Policy 19 (“Offices”) seeks to protect office space within the Borough, and in particular it identifies Enfield Town as the main location for new office development. In other centres, the conversion of surplus office space is supported where it is demonstrated that there is no demand in the particular location. This is reiterated in DMD22 (“Loss of Employment Outside of Designated Areas”).
- 6.4.2. A Qualitative Appraisal demonstrates that due to the large office floor plates, the cost of upgrading the building fabric, together with rent yield, would result in the re-use of the buildings for commercial uses not being viable. Although the proposal will result in the loss of existing office space, employment activity will be maintained through the proposed flexible permission relating to the ground and first floor levels of Block C (to include: retail; financial and professional; restaurant/café; office; and non-residential institution uses falling within Use Class categories A1, A2, A3, B1a and D1). The total floorspace proposed for these uses is 2,492 sqm GEA (2,430 sqm GIA). Other benefits include:
- 102 - 214 gross FTE direct jobs on-site once the development is fully complete and occupied (38-80 indirect indirect/induced FTE jobs);
 - £5.4 - £15.6 million Gross Value Added (GVA) annually (£2M to £6.3M across Enfield);
 - £200,000-£300,000 business rate revenue per annum;
 - 202 employed residents;
 - £3.2 million retail and leisure household expenditure annually;
 - £240,000 council tax revenue annually;
 - £3.9m per annum in visitor expenditure;
 - 178 Full Time Equivalent (FTE) temporary construction jobs; and
 - £18.5 million GVA per annum during the 2.7 year construction period.
- 6.4.3. In addition, there are no neighbouring employment sites which would be compromised by the development and as detailed within the *Economic Impact Assessment*.
- 6.4.4. The proposal will deliver a range of social and economic benefits to Cockfosters, in addition to the wider economies of Enfield and London. The development will bring back into full beneficial use one of the office buildings (Black Horse Tower), improve leisure / tourism facilities through the provision of a hotel and gym, and offer additional A1/A3 uses within a robustly performing Large Local Centre. These are considered to outweigh the economic impacts associated with the existing uses of the site, having regard to DMD22.

6.5. Housing Need

- 6.5.1. 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.

6.5.2. 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.

6.5.3. 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	%
1b	0	0
2b	121	73.8
3b	37	22.5
4b	6	3.7
TOTAL	164	

6.5.4. Although the above table shows that the development would continue to fall significantly short of the Core Strategy target, this should be weighed against the significant increase in the provision of housing across the site.

Affordable Housing

6.5.5. 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 40%, with a target tenure mix of 70% social / affordable rent and 30% intermediate.

6.5.6. Of the 164 units that will be provided, 54 (33%) will be affordable. Although below the policy target (40%), an independent viability assessment has concluded that the proposal represents 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 1, 3 and 4 of the Development Management Document.

6.5.7. 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.

6.6. Impact on Character of Surrounding Area

Density

- 6.6.1. 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 3-4, thereby suggesting that a level of density in the range of up to 130 units per hectare (u/ha) may be appropriate for this location. A total of 164 units are proposed on a site measuring approximately 1.24ha, equating to a density of approximately 132u/ha.
- 6.6.2. Although the scheme exceeds the suggested density range, it is considered that it would be difficult to refuse on this element because it is only exceeded by a marginal amount. Moreover, 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

- 6.6.3. 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.
- 6.6.4. 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.

6.6.5. A useful definition for tall buildings can be found in the supporting text to London Plan Policy 7.7 (“Location and design of tall and large buildings”): *Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.*

6.6.6. The tallest element of the scheme is the refurbished 9-storey Black Horse Tower with an additional floor. Given the broad typology of the wider area, Black Horse Tower stands out as an anomaly. The Enfield Characterisation Study (2011) (“Characterisation Study”) discusses the impact that tall buildings can have on the borough’s townscape and landscape. It highlights the need to consider their introduction carefully in the context of existing development and landscape designations. In particular, it concludes that *“Tall buildings have an important relationship with topography, particularly where there are areas of special character or key views which could be affected by a prominent building”.*

6.6.7. With specific regard to the site, the Characterisation Study identifies the nine storey office block is identified as *“a notable exception to the otherwise suburban character...”* (p.133). At page 193, further reference is made:

“The office building at Cockfosters station is a clear example of the potential for a tall building to impact on an important landscape. Although it meets a number of locational criteria for a tall building such as being at a transport node and close to shops and services, its position on the ridge over the Trent Country Park means that it has a substantial impact on the Trent Park conservation area”.

6.6.8. In addition, the *Tall Buildings and Views* report accompanying the DMD identifies Holbrook House / Black Horse Tower as an inappropriate building in an inappropriate location (Appendix 1- table entry 48):

“On a ridge occupying a prominent position very sensitive to tall buildings. The existing curved shaped building is highly visible in many views from the south and east. Although serving as a landmark and aiding legibility of the borough the existing building does not contribute positively to its surroundings nor provide high quality public space. However, the site has good access to public transport being adjacent to Cockfosters tube station the existing office use is appropriate in this location. A high quality less bulky replacement building that better respects the prominent location and setting might be acceptable.”

6.6.9. The façade of the building will be improved with the use of more modern materials, windows updated and improved, and depth provided to improve the visual appearance of the building. The proposed roof has been reduced in depth so that it presents a thinner profile. This is considered to be an improvement to the overall appearance of the building.

6.6.10. The additional floor would effectively replace and infill the existing substantial plant room at either end of the roof. In contrast to the remainder of the building, the additional floor is composed of lightweight materials (predominantly glazing) and is set back from the edges of the building, helping to reduce massing. Whilst the existing (and proposed) height is at odds with the surrounding developments, it is recognised in policy 7.7 of the London Plan (“Location and design of tall buildings”) and DMD43 (“Tall Buildings”), that tall buildings are considered more appropriate when located in areas of good public transport access.

- 6.6.11. The improvements to Black Horse Tower is considered acceptable and will serve to improve the character and appearance of this building, having regard to Policy 7.7 of the London Plan, CP 31 of the Core Strategy and DMD43 of the Development Management Document.
- 6.6.12. Block B, a 7-storey residential building, will be located south of Black Horse Tower and replaces the part 3-, part 4-storey Churchwood House. Whilst significantly taller than the existing building, it will not completely obscure views of Black Horse Tower as that building will still be visible above and also through the gap between to Block C. Its overall design is considered acceptable.
- 6.6.13. Block C will rise to a maximum height of 6-storeys and will provide flexible uses on the ground and first floors and private residential and a hotel on the upper floors. It will be significantly taller than Holbrook House (3-storeys) but this is considered acceptable because it is largely separated from Cockfosters Road by Cockfosters Green, thereby not appearing too dominant when compared against the buildings opposite (maximum 4-storeys). The overall design has been improved through the introduction of vertical elements into the façade, helping to reduce the visual bulk of the building. The overall design is considered acceptable and the varying heights and gaps through all contribute to the visual interest of the building.

Layout

- 6.6.14. The layout of the development is a response to the irregular shape of the development site and is also largely dictated by the siting of Black Horse Tower and the location / proximity of Cockfosters Green.
- 6.6.15. The proposed buildings step down in height, providing a transition between Black Horse Tower and the lower developments on the western side of Cockfosters Road and Norfolk Close. The varying heights and gaps between the buildings allows for views into / out from the site. In addition, although the site sits at the northern end of the Large Local Centre, by design, it currently feels detached from the remainder of the Centre. The development proposal will create a more pedestrian friendly environment along the frontage of Block C and pathways from Cockfosters Road through Cockfosters Green assists in creating some permeability and activity. The range of buildings coupled with the overall layout and public realm improvements contribute to place-making, having regard to DMD37.
- 6.6.16. The proposed layout will have some impact on the local microclimate. London Plan Policy 7.7 advises that tall buildings should not adversely affect their surroundings with regards to microclimate and wind turbulence. The submitted *Wind Microclimate Assessment* confirms that there will be localised areas where conditions are anticipated to be windier than desired for the intended pedestrian use. However, mitigation measures, such as plantings, recessed entrances, and screens can help reduce wind speeds to a more suitable level. A condition will be imposed to seek details of any mitigation measures beyond that already provided for within the landscaping strategy.

Quality of Accommodation

- 6.6.17. 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.

6.6.18. 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

6.6.19. 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.

6.6.20. All residential units will be provided with balconies or terraces. External balcony amenity for the refurbished residential block (Black Horse Tower) will be provided through the introduction of a balcony façade structure across the building on the south side. In addition, winter gardens have been introduced to provide additional private outdoor amenity space to the majority of these units.

6.6.21. External balconies are also provided to the apartments in the affordable block. These are projecting type and all meet the minimum size standards. Garden amenity to the duplex apartments is located within the private podium space on the southern side of Black Horse Tower. Further shared external amenity for the private and affordable residential makes up the remaining central private podium space above the service area accessible directly via circulation cores.

6.6.22. The development proposal includes the provision of a large central courtyard, which will be accessible from each block. Planting along the courtyard's northern edge adds colour and interest to the space whilst helping differentiate between the communal garden and private sunken courtyard gardens to the south of Black Horse Tower. Trees in the courtyard are located above structural supports within the basement below allowing them to be of substantial size. Also located in the courtyard is a number of natural play features aimed at 0-5 aged children.

6.6.23. It is noted that the GLA considered that there was insufficient provision of play space (100sqm) for the 0-5 year olds. The anticipated child yield (76 Children) would suggest a requirement for 760sqm of play space, which would effectively comprise of almost the entire courtyard area. The purpose of the courtyard is to provide active and passive amenity space for all age groups and not just for one, although it is noted that the close proximity of Trent Park would also cater for older age groups. Having regard to the comments from the GLA, the applicant has amended the details of how the development will comply with the play space requirements within the submitted Landscape Addendum. The level of provision is now considered acceptable.

6.6.24. Cockfosters Green currently is an area of grass containing meadows, some planting and a number of established mature trees. The Green has an aesthetic value seen by people but is rarely actively used by people. The proposed improvement will, by including pathways through and benches allows for greater activity / use.

Daylight / Sunlight Levels

6.6.25. 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: a guide to good practice 2011* and the British Standard document *BS8206 Pt2*. Three methodologies have been used: the Vertical Sky Component ("VSC"), the No-Sky Line Contour ("NSC") and the Average Daylight Factor ("ADF"). It should be noted that the first two methodologies relate to existing buildings, whilst the ADF test is used for the assessment of new buildings. In addition, commercial properties are excluded because they are generally designed to rely upon electric lighting. The properties assessed included:

- 6.6.26. The ADF method 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.
- 6.6.27. The results of the ADF assessment have shown that 175 (86%) of the 204 rooms assessed achieve daylight levels in excess of their target values. Fourteen of the 29 rooms which do not meet the BRE target levels are bedrooms, most of which are situated in Blackhorse Tower (Block A). The BRE guidance places less importance on bedrooms and sets lower target values. Furthermore, the majority of these rooms are located on the lower floors in areas where full adherence to the recommendations for daylight is difficult due to a greater level of obstruction to the potential view of sky due to the proximate massing e.g. at the junctions between the blocks. This reduced view of sky is exacerbated by the fact that these windows are set behind overhanging balconies which further blinker the view of sky. The trade-off of daylight marginally below that suggested in the BRE guidance and the private external amenity these balconies provide is considered acceptable in this case. Therefore, it is considered appropriate to apply the flexibility outlined within the BRE guidance.
- 6.6.28. 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. The results of the assessment show that the amount of sunlight provided within the central amenity space falls just short of the BRE recommendations, with 46.3% of the amenity area receiving at least 2 hours of sunlight on the 21st of March. Although it does not achieve the recommended 50%, only three days later on the 24th March, 50.4% of the amenity space will see at least two hours of sunlight.

Lighting Strategy

- 6.6.29. It is acknowledged that an external lighting scheme will need to be developed to provide sufficient lighting for security purposes whilst also avoiding overspill light pollution on existing neighbouring housing or have a negative impact on areas of nature and wildlife. Details will be secured by condition.

6.7. Impact on Neighbour Amenity

Loss of Light / Overshadowing

- 6.7.1. The proposed development will result in a significant increase in the bulk and massing of the built form nearer to boundaries, and in particular near to the common boundary with properties fronting Norfolk Close (Nos.1 to 6). The aforementioned daylight and sunlight assessment has considered the impact of the development on the following neighbouring properties:

- 1-6 Norfolk Close

- 7-10 Norfolk Close
- 11-16 Norfolk Close
- 147-149 Cockfosters Road
- 6-12 Cockfosters Road
- 10 Mount Close

6.7.2. Of the 29 windows tested at 1-6 Norfolk Close, with regards to the VSC, 76% (22) passed, while 6 of the remaining 7 windows retain at least 0.7 times their former value, falling marginally short of the recommended value (0.8). With regard to the NSC, 96% of the rooms tested meet with the BRE guidelines while the one room that failed retains 0.6 times its former value.

6.7.3. It is acknowledged that the development proposal will have a minor effect upon the daylight and sunlight received at 1-6 Norfolk Close, however, where windows or rooms have not met with BRE guidelines, these instances are very minor and would not, by themselves, form a sustainable reason for refusal.

Distancing / Loss of Outlook / Overlooking / Loss of Privacy

6.7.4. It is acknowledged that given the greater massing of buildings nearer to boundaries, 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					

6.7.5. The nearest residential buildings are to the south-west on Norfolk Close (Nos.1 to 6), sited between 7m and 11.5 to the common boundary with the application site, with a further 15m to the façade of the existing (Churchwood House) and proposed buildings (Block B).

6.8. Block B will be substantially taller than Churchwood House (3-storey), thus having a greater presence to those residents fronting Norfolk Close. However, unlike Churchwood House which extends for 30m near to that boundary, Block B extends for approximately 21.6m, beginning towards the rear of Nos.5&6 Norfolk Close.

6.9. Some substantial boundary trees within the gardens of those properties help to screen them from the development site, although it is noted that these are deciduous. The development proposal does not change this relationship. The lower three floors of Block B will still be screened by trees, thus not leading to any greater loss of privacy or overlooking. There will be no direct loss of privacy through rear-facing windows from the upper floors because of the sight angles. In addition, the northern end of Block B will only have side views of the rear gardens for 7&8 Norfolk Close.

6.9.1. It is considered that the development proposal will not substantially alter the existing relationship with regards to overlooking and privacy for adjacent occupiers.

6.10. Highway Safety

6.10.1. 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

6.10.2. 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

6.10.3. The site, as discussed above, is located in an area with a good PTAL score (3-4).

Unit Size	Number of Units Proposed	Minimum Provision	Maximum Provision
1b	0	0	0
2b	121	0	121
3b	37	37	55.5
4b	6	6	12
Total	164	43	188.5

6.10.4. The Transport Assessment ("TA") indicates that the development proposals include a total provision of 177 spaces, including 20 disability spaces. For the residential element of the scheme, 94 spaces (including 16 disabled spaces) are being provided, having regard to the good PTAL score.

6.10.5. For employment uses (including B1a use) in Outer London, the London Plan specifies a maximum of 1 car parking space per 100sqm to 600sqm GIA dependant on the PTAL level. Based on a PTAL of 3 to 4 at the Site, a car parking standard of 1 space per 300sqm would be considered appropriate for B1a use at this location.

6.10.6. The proposed 1,716sqm flexible retail space (A1, A2 or A3 uses) is speculative and therefore the split between A1/A2/A3 uses is unknown at this stage. For the purpose of the car parking calculation, it is proposed to apply the car parking standard for food retail (1 space per 30sqm) as this would represent the upper limit between the uses. It is proposed to reduce this by 30% to allow for local shopping trips, which are likely to be walking trips, the principle of which is agreed. It is proposed to provide 42 spaces for the retail use, inclusive of 2 disabled spaces.

6.10.7. In terms of the proposed flexible D1, B1a or A3 uses (776sqm), the split between these uses is also unknown at this stage. For the purpose of calculating the number of car parking spaces, it is proposed to apply the car parking standard for food retail with a reduction of 30% (as discussed above) to 50% of the overall floorspace

(388sqm) and the car parking standard for employment uses to the remaining 50% of floorspace (388sqm). A total of 11 spaces, inclusive of 1 disabled space, are proposed.

6.10.8. With regard to hotels (C1) use, there is no maximum car parking standards set out in the London Plan. It is recommended for hotels that in locations with a PTAL of 4 to 6, on-site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches, and deliveries/servicing. In locations with a PTAL of 1 to 3, provision should be consistent with objectives to reduce congestion and traffic levels and to avoid undermining walking, cycling or public transport. It is considered that 0.6 car parking spaces per hotel room is appropriate for a hotel at this location taking into account the PTAL of 3 to 4 at the site. However, it is proposed to reduce this to take account of retail/commercial parking spaces being available for hotel users outside the core retail hours. Thirty spaces, including 1 disabled space, are proposed.

6.10.9. Having regard to the comments received from the GLA, the previously proposed 29 spaces for the hotel use have been removed but one space will be provided for disabled users. Should hotel guests require parking, they would be able to utilise the retail/commercial spaces outside of the core retail hours.

Cycle Parking

6.10.10. 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 remainder of the proposed uses would require the following provision:

- Food Retail (A1) = 1 long stay space per 175sqm and 1 short stay space per 40sqm for first 750sqm and thereafter 1 short stay space per 300sqm;
- Non-Food Retail (A1) = 1 long stay space per 250sqm for first 1,000sqm, 1 space per 250sqm thereafter and 1 short stay space per 125sqm for first 1,000sqm;
- Other Retail (A2-A5) = 1 long stay space per 175sqm and 1 short stay space per 40sqm;
- Offices (B1a) = 1 long stay space per 90sqm and 1 short stay space per 500sqm for the first 5,000sqm;
- Hotels (C1) = 1 long stay space per 20 bedrooms and 1 short stay space per 50 bedrooms;
- Health Centre (D1) = 1 long stay space per 5 staff and 1 short stay space per 3 staff

6.10.11. The proposed cycle parking provision for the site is set out in Table 5.2 of the Transport Statement, as shown below:

Land Use (GEA)	Long Stay Spaces	Short Stay Spaces	TOTAL
164 Residential Units (C3)	251	4	255
1,716sqm Retail (A1/A2/A3 use)	10	43	53
776sqm (D1/B1/A3 uses)	3	14	17
64-bed Hotel (C1)	4	1	5
TOTAL	268	62	330

6.10.12. Detailed plans showing all cycle stores, number of spaces, type of stands, dimensions of the cycle store, materials of the racks and stores etc. can be reasonably conditioned. 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. In addition, the submitted details should also confirm staff change / shower facilities for the employment uses.

Trip Generation

6.10.13. The methodology to predict the trips was by using the industry standard TRICS software. This is an acceptable approach and T&T agree with the results. Overall the traffic generated to and from the site in the peak hours is unlikely to have a significant impact on the operation of the nearest junctions. It is noted vehicular trips will increase based on the existing use, and that the directions of vehicles will change, but overall the numbers are not high enough to require further junction assessment. It is noted that the methodology is included in the original transport scoping note and not the actual Statement.

6.10.14. There is also likely to be an increase in trips of other modes of transport to and from the site. The number of cycling trips and pedestrian walking trips could significantly increase due to the number of cycle spaces being provided and also the new retail units which will act as a destination for local residents, and also due to the promotion of sustainable transport modes through the Travel Plan. The predicted level of cycling (1%) is not considered robust because the aspiration of the Council is to increase cycling level towards 5%, which will be achieved through the delivery of the Cycle Enfield initiatives throughout the borough.

6.10.15. These additional trips are likely to have a material impact on the local footway and cycle route network, and therefore some mitigation towards this impact should be addressed through a legal agreement.

Access

6.10.16. 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.

6.10.17. Vehicular access is from the existing point of access at the western end of Westpole Avenue. There are no concerns with the re-use of the access point. Whilst it has been suggested that a raised table should be formed near the entrance in order to make driver aware of pedestrians, this is considered unnecessary. The provision of a pedestrian crossing is considered sufficient.

6.10.18. Pedestrian access is being redesigned in compared to the existing arrangement. The retail units will be accessed from a new pedestrian footway to be constructed in place of the existing access road running across the frontage of the site. This is considered an improvement. Pedestrian access to the residential units will be from either end of the site and from within the car park.

Refuse, Servicing & Emergency Access

6.10.19. 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.

6.10.20. Service vehicles will access the site from the car park access then turn into a service area located behind the commercial units. There are three service bays provided and the vehicle tracking diagrams confirm that all vehicles can access and egress the bays in a forward gear. Not all the units have a service bay but there is a large service area/turning space which provides a suitable area should additional servicing space be required.

6.10.21. Refuse collection for the residential units is also shown as taking place from the service yard. The bin stores for the units are close enough to the service yard to be collected without the need for the bins to be moved more than the recommended 10m.

6.10.22. These details will be secured via planning conditions.

6.10.23. It is also noted that TfL require operational access through the site. Details of how this will be maintained will be secured.

Electric Charging Points

6.10.24. The development is proposing 18 active and 35 passive spaces. For residential parking, the London Plan requires 20% of the parking spaces for electric vehicle parking and a further 20% passive provision for future use. Based upon the 94 spaces allocated for residents, this would equate to 19 active and 19 passive. Other standards apply in relation to retail uses (10% / 10%) and B1 uses (20% / 10%). The rationale for a lower active provision is that there is some uncertainty in the take-up of such spaces. The applicant supports the need for charging points and is therefore providing the infrastructure to increase the number of active charging points through the passive provision.

6.10.25. A solution would be to have a review mechanism built into the s106 so that after certain periods of time, surveys are undertaken to assess the demand for the active charging points and if necessary, increase their provision.

Highways Mitigation

6.10.26. 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.

6.11. Sustainable Design and Construction

Contamination

6.11.1. A *Preliminary Environmental Risk Assessment* was submitted in support of the application, with a series of recommendations made. Conditions will be imposed to secure some of the recommendations, such as: the details of any investigation; and a Construction Management Plan.

Air Quality

Construction Dust Assessment

6.11.2. 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.

6.11.3. 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.

6.11.4. 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

6.11.5. In April 2014, the GLA published a report to provide support to the Mayor's policy related to 'air quality neutral' developments. The report provides a method to enable a development to be assessed against the air quality neutral benchmarks set out in the Sustainable Design and Construction SPG. It requires the transport and building emissions for the development to be identified and then compared to the benchmark emissions. The report notes that the building and transport emissions should be calculated separately and not combined

6.11.6. The energy centre for the Development comprises a gas-fired Combined Heat and Power (CHP) plant and two gas boilers. The Total Building NO_x Emission of 388.0kg/annum for the Development is below the benchmark of 631.9kg/annum. Given this, the Development is considered to be 'Air Quality Neutral' with respect to building emissions and no further mitigation would be required.

6.11.7. The Total Transport Emissions for NO_x (143.6kgNO_x/annum) is less than the Development Transport Benchmark NO_x Emissions (758.3kgNO_x/annum). Similarly, the Total Transport Emissions for PM₁₀ (24.7kgPM₁₀/annum) is less than the Development Transport Benchmark PM₁₀ Emissions (130.5kgPM₁₀/annum). As

such, the Development is considered to be 'Air Quality Neutral' in relation to transport emissions, and no further mitigation is required.

Summary

6.11.8. The proposed development is considered to be air quality neutral in respect of building and transport emissions. 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, however this can be mitigated against through details submitted via an appropriately worded condition.

Noise

6.11.9. To assist in the consideration of any potential noise impact, a *Noise and Vibration 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.

6.11.10. 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 8 of the *Noise and Vibration Assessment*.

6.11.11. Some noise and disturbance to existing adjoining residents is inevitable during the construction phase. Details of how the development mitigates any potential impact to adjoining occupiers throughout the construction phase will be secured by condition. This could include, amongst other measures, a restriction on hours of works, hoardings, monarflex covering on scaffolding, and engagement with local residents.

6.11.12. 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

6.11.13. 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.

6.11.14. The proposal involves the demolition of two of the existing buildings on the site and the refurbishment and extension of Black Horse Tower. An ecological appraisal ("Preliminary Ecological Statement") has been submitted and as part of the appraisal, an Extended Phase 1 Habitat Survey was undertaken in order to establish the ecological value of the site. In addition, a desk study and walkover survey was undertaken with the following results noted:

- The existing buildings are not suitable for roosting bats or nesting birds;
- Ornamental planting around the site is considered suitable foraging and nesting opportunities for birds and invertebrates but too small for bats;
- potential for bats or nesting opportunities for bats;
- Some invasive species (Cotoneaster, rhododendron, Japanese rose and buddleia) were recorded;
- Whilst some of the trees offer potential foraging and nesting opportunities for common bird species, they do not have any suitable features to support roosting bats.

6.11.15. Recommendations have been made within the Ecological Statement to manage 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 will be reflected in the suggested conditions.

6.11.16. Green roofs are proposed on the southern blocks. These will contribute to enhancing the ecological value of the site in addition to providing storm water control. The green roofs will be secured by condition.

6.11.17. 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

6.11.18. An Arboricultural Report 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.

6.11.19. 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'

6.11.20. The trees are largely located along the boundaries of the site, with a number of trees located in Cockfosters Green. The tree survey area comprises a total of x53 individual trees and x2 tree groups. The majority of those on site (37) are classed as “Category C” trees, while no “Category A” trees were recorded, however x15 “Category B” and x3 “Category U” trees were recorded. A number of trees are to be removed in order to facilitate the development, however, many will be re-provided such as along the eastern boundary shared with properties fronting Norfolk Close, the eight existing trees will be replaced with 10 Lime trees. Of particular note are the trees proposed within the courtyard. Due to their size, each will be positioned above the structural columns below.

6.11.21. An appropriately worded condition will be imposed to provide protection to retained trees and to also seek appropriate replacement planting. Moreover, no trees (and other vegetation) will be permitted to be removed during the nesting season unless under the supervision of an appropriately qualified ecologist.

Energy

6.11.22. 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. Energy Strategies have been provided for the residential and non-residential elements of the scheme.

6.11.23. The energy strategy which has a target carbon emission savings for this energy strategy are 35% less than a Building Regulations Part L2A:2013 baseline, adopts a hierarchical approach using passive and low energy design technologies to reduce baseline energy demand and CO₂ emissions followed by the application of low and zero carbon technologies.

6.11.24. The focus of this energy strategy is on CO₂ reduction by using a highly efficient building envelope with high efficiency mechanical and electrical services, along with air source heat pumps, solar thermal panels serving the domestic hot water base load in conjunction with photovoltaic cell renewable technology. The result is a proposed development with predicted performance of:

- Block B achieves a 38.69% reduction in carbon and Block C achieves a 39.93% reduction
- Block A is a refurbishment and doesn’t fall under the London Plan requirement of 35% carbon reduction and has no carbon requirement under Building Regulations. With the improvements proposed it achieves a 3.51% reduction

6.11.25. A condition is suggested to ensure that the development complies with the targeted savings.

Renewable Energy

6.11.26. A range of potential renewable energy technology options have been considered. Photovoltaics have been 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. The rooftop of Block B is identified as being the most suitable for the siting of the pv panels.

6.11.27. A condition is proposed to secure the details and ongoing maintenance of the PV panels.

Drainage

- 6.11.28. 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.
- 6.11.29. 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, therefore it is at low risk of flooding.
- 6.11.30. A range of sustainable drainage measures have been incorporated into the scheme, which will need to be secured by condition.

Site Waste Management

- 6.11.31. 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.
- 6.11.32. 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.
- 6.11.33. A Site Waste Management Plan will be conditioned to demonstrate how the development will meet or exceed the targets as set out above. In addition, it should also detail how “controlled waste” such as contaminated soil, asbestos or invasive plant species are handled.

6.12. Education / Childcare

- 6.12.1. The scheme will be liable for education and childcare contributions for the net increase of units on site, in accordance with the adopted s106 SPD. This would need to be secured via an s106 legal agreement.

6.13. Employment and Training

- 6.13.1. 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.

6.13.2. 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.

6.13.3. Community Infrastructure Levy (CIL)

6.13.4. 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 (286 for February 2016).

6.13.5. The development is CIL liable for the construction of the additional floor space, less the existing floorspace to be demolished (4,553sqm) and the 54 affordable units) which are eligible for relief.

6.13.6. 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).

6.14. **Section 106 / Legal Agreement**

6.14.1. 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.

6.14.2. 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 54 units in total for on-site affordable housing provision
 - Up to 50% rented
 - Up to 50% shared ownership
- Contribution towards education and 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.
- Up to £40,000 towards pedestrian improvement works identified in the PERS audit
- £40,000 towards providing better links from the site to main cycle routes as part of the Cycle Enfield project
- Up to £20,000 towards travel plan monitoring and surveys
- Travel Plan
- Review mechanism for the number of active electric vehicle charging points
- A contribution (to be agreed) towards step-free access at Cockfosters Station
- Parking Management Plan
- S278 Legal Agreement (for all highways improvements and highway works across the site)
- 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

6.15. Other Matters Raised

- 6.15.1. 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.

7. Conclusion

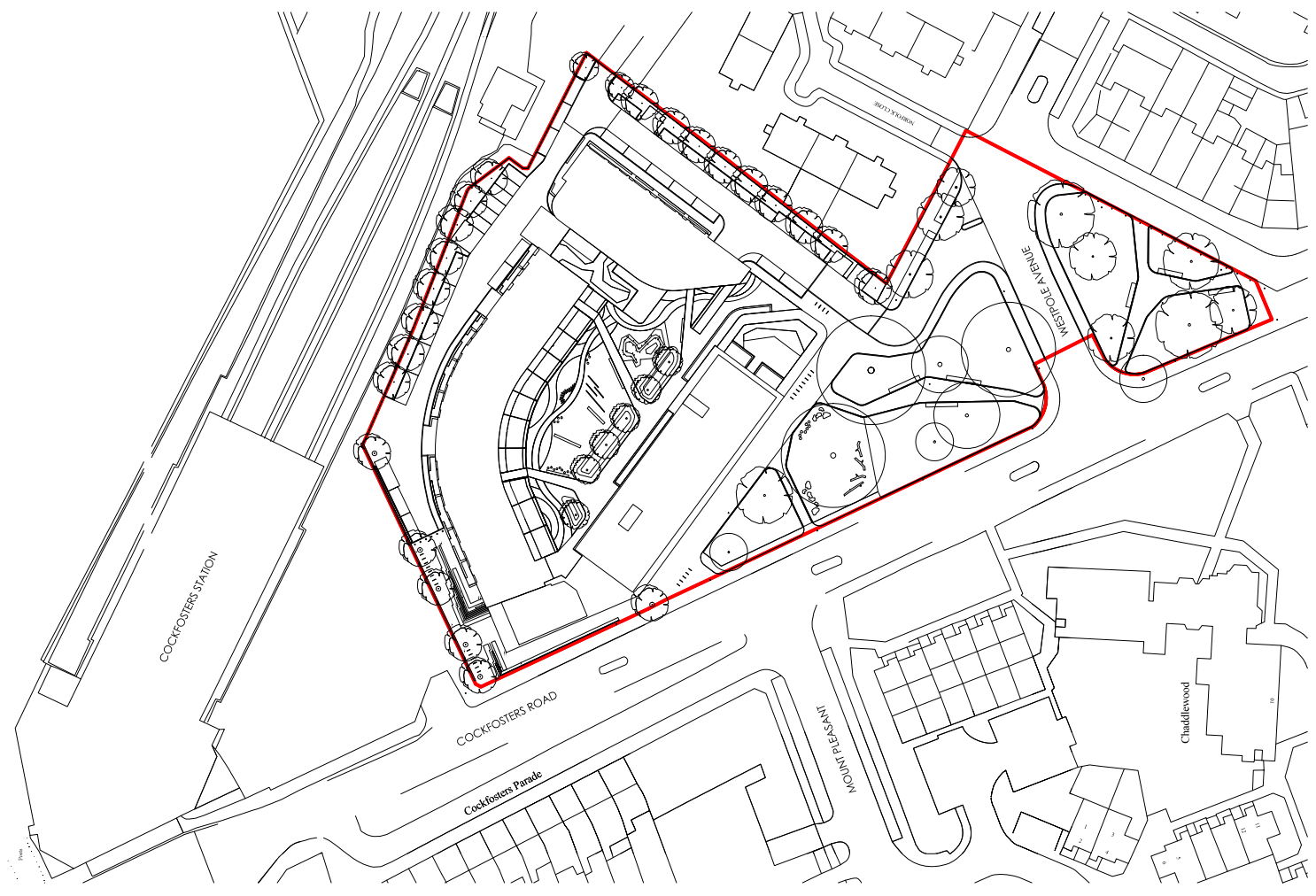
- 7.1. Having regard to all of the above, it is considered that planning permission should be granted for the following reasons:

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, 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 unduly 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 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 access throughout construction
5. Details of levels (proposed)
6. Foundations / pilings / underground structures (to avoid damage to rail / water infrastructure)
7. Details of a Construction Site Waste Management Plan
8. Details of materials
9. Material samples / sample panels on site
10. Securing mix / size / layout of units
11. All dwellings to be accessible / adaptable
12. Secured by Design
13. Details of external lighting
14. Details of hard surfacing
15. Parking / servicing facilities
16. Number / location of disabled parking bays
17. Private vehicles only – parking areas
18. Number / location / design of electric vehicle charging points
19. Means of enclosure
20. Details of a Construction methodology / Traffic management plan
21. Cycle storage
22. Details of refuse storage / recycling facilities
23. Energy efficiency
24. Details of zero / Low carbon technologies
25. Details of water efficiency (potable water)
26. Restriction of use of flat roofs
27. Drainage Strategy
28. Verification report that drainage strategy has been implemented
29. Tree protection
30. Vegetation clearance outside of bird nesting season
31. Landscaping
32. Ecological enhancements
33. Contamination
34. Management plan for communal amenity areas
35. Biodiverse roofs
36. Details of a mechanical ventilation strategy
37. Noise attenuation for plant
38. Details for communal satellite dish / TV antenna provision
39. Details of play space equipment to be provided



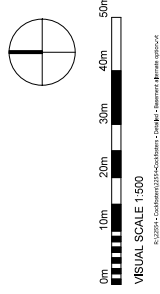
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22554	A-10-002	A	

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Block Plan
1 : 500

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Revision	Issue	CD
A	Design development	05/08/16 DC PM
B	Parking Updated	08/08/16 DC PM
C	EB7 Issue	09/08/16 DC PM
D	PLANNING ISSUE	10/09/16 DC PM
E	Minor internal amendments	07/12/16 DC PM
F	Minor internal amendments	07/12/16 DC PM
G	REVISED PLANNING ISSUE	14/12/16 DC PM

Refer to Barton Willmore Landscape drawings for detailed landscape proposals

KEY	
	Existing Levels
	Proposed Levels

Application Boundary

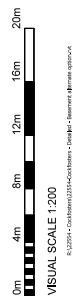
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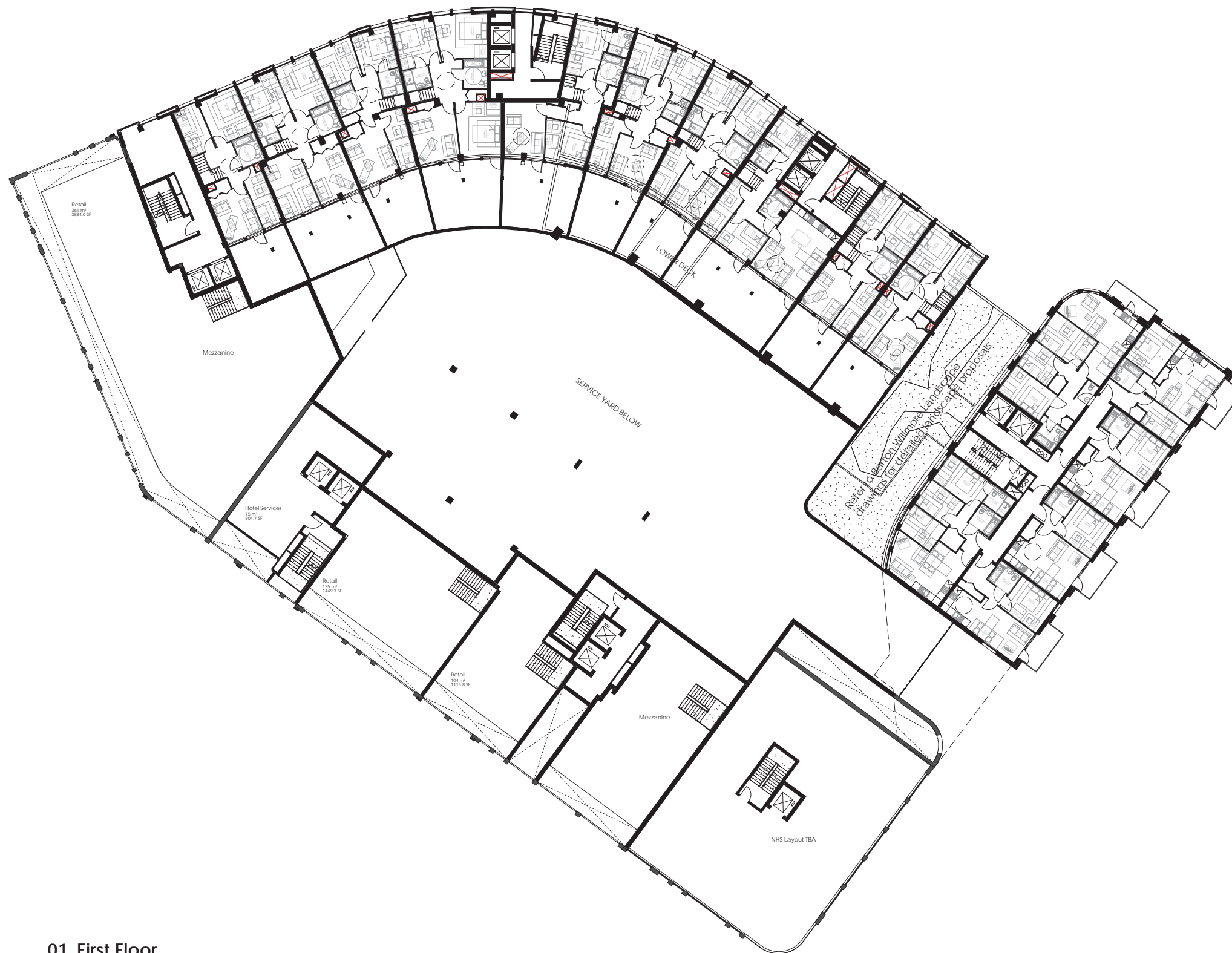
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Revision	Date	Drn	Ckd
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B	09/08/16	DC	PN
C	10/08/16	DC	PN
D	07/12/16	DC	PN



01_First Floor
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Project
116 Cockfosters Road, Enfield
EN4 0DY
Drawing Title
Proposed First Floor Plan

Date	Scale	Drawn by	Check by
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22554	A-11-001	D	



VISUAL SCALE 1:200

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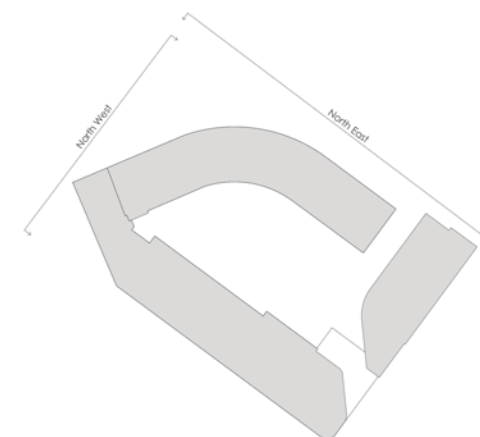
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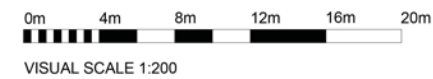
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Site Elevation North West
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Project
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EN4 0DY
Drawing Title
Proposed Site Elevations North East
and North West
Date
28/07/16
Project No
22554
Scale
As indicated @ A1
Drawing No
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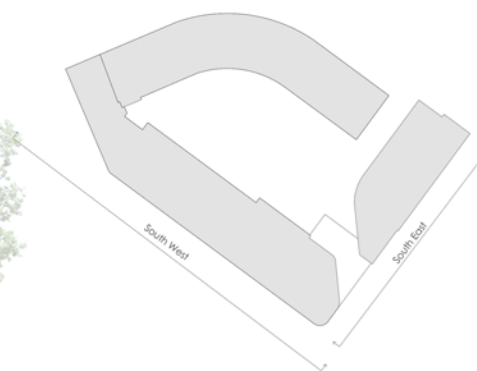
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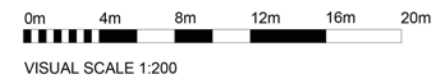
Site Elevation South East
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Site Elevation South West
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Project
116 Cockfosters Road, Enfield
 EN4 0DY
 Drawing Title
Proposed Site Elevations South East and South West
 Date 28/07/16 Scale As indicated @ A1 Drawn by DC Check by PN
 Project No 22554 Drawing No A-13-009 Revision C



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Project
Cockfosters Road



Drawing Title
Illustrative Landscape Masterplan

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Project No 22554	Drawing No RG-L-15		Revision G

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