

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date : 19th December 2017

Report of
Assistant Director,
Regeneration & Planning

Contact Officer:
Kevin Tohill
Andy Higham

Tel No: 0208 379 5508

Ward:
Bush Hill Park

Ref: 17/00344/RE4

Category: LBE - Major Dwellings (Dev by LA)

LOCATION: Bury Lodge Depot, Bury Street West, London, N9 9LA

PROPOSAL: Demolition of existing buildings and structures, construction of new road with vehicular access to Bury Street West and erection of 50 residential units comprising mix of 2 and 3 storey semi-detached houses with associated landscaping and amenity including sub-station.

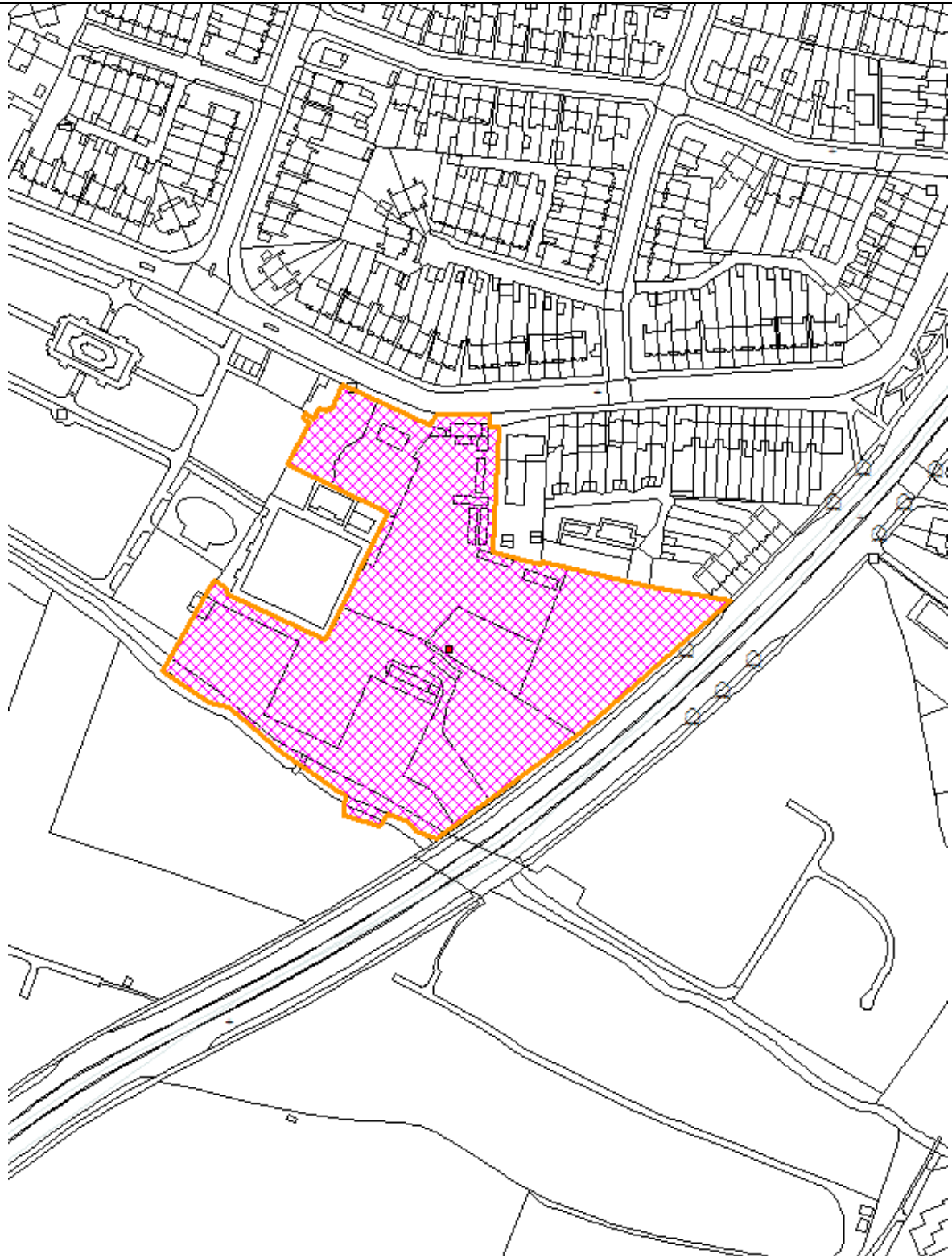
Applicant Name & Address:
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London Borough Of Enfield
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Enfield
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Agent Name & Address:
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RECOMMENDATION:

That, subject to referral to the Great London Authority, the Head of Development Management/Planning Decisions Manager(s) be authorised to finalise conditions and to **GRANT** planning permission subject to conditions.

Ref: 17/00344/RE4 LOCATION: Bury Lodge Depot, Bury Street West, London, N9 9LA



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1. Summary of Main Issues

1.1 The main issues involved in this application are:

The principle of redevelopment of an MOL site with residential dwellings;

The visual impact of the proposed buildings on the openness, character and appearance of the surrounding area, streetscape, nearby listed building and local views;

The impact of the proposal upon surrounding residential amenity in terms of visual intrusion, overbearing impact, a sense of enclosure, loss of light, privacy, noise and disturbance;

The acceptability of a residential use in this location;

The quality of the residential accommodation proposed;

The acceptability of the quantum and type of affordable housing provided;

The impact of the development upon the highway network, conditions of highway safety and levels of parking provision;

The ability of the proposal to reduce its energy demands through the use of renewable energy technologies and increased energy efficiency;

The measures taken to mitigate the effects of the proposal through contributions secured by CIL, and;

The effect of the proposal on water resources and its ability to resist flooding

2. Site and Surroundings

2.1 The application site is a former Council depot, accessed from Bury Street West and owned by the Council. The Council depot use is no longer required in this location as the depot operation has been relocated as part of a wider strategy to combine a number of smaller depots in one location. The site is therefore vacant and has been identified by the Council as an opportunity for redevelopment.

2.2 The site is approximately 1.86 hectares in size, located at the southern end of Bush Hill Park, on the south side of Bury Street West within a generally residential location. The site is bounded to the north and northeast by residential properties along Bury Street West, the Grade II* listed Salisbury House and the Bury Lodge Bowls club immediately to the west, with Bury Lodge Gardens beyond that. The A10 runs along the eastern boundary with Salmons Brook to the southern end of the site, with open space and allotments beyond that.

2.3 The surrounding area is predominantly residential in nature, with most properties dating from the 1920's and 1930's. The character is suburban with terraced and semi-detached houses. Immediately adjacent to the site is Salisbury House which is a Grade II* listed building, dating back to the late 16th / early 17th Century. Salisbury House was listed in 1954 and the Council bought the property in the mid-1930s. Its height and position along Bury Street West has warranted its importance as a heritage asset within the wider London Borough. The eastern elevation of Salisbury House seen from its garden, is obstructed by a screen of evergreen trees when viewed approximately 25 m away from the site entrance with the existing bungalow and fencing in the foreground. A 2.65m high Grade II listed brick wall attached to

Salisbury House terminates at the proposed site entrance. The garden attached to Salisbury House is currently accessed through a blue door in the brick wall. The Bury Lodge Bowls Club green and Bury Lodge Park to the west of the site, include a formal park with sections laid out to rose beds, flower borders, lawns and a children's play area.

- 2.4 The original use of the whole Bury Lodge West site was a horticultural nursery for growing plants to stock parks and other areas managed by the Council's Parks Department. The nursery function however, became less important and the use of the site subsequently evolved into one of the Council's principal maintenance depots, including waste recycling, cleansing and highway services vehicles as well as storage of vehicles and equipment for the Council's Parks function. The storage depot use commenced in the early 1990's and consolidated as the horticultural use was superseded.
- 2.5 The site itself is designated as Metropolitan Open Land (MOL), however the site is not publicly accessible and comprises previously developed land with lawful use for light industrial (B8). While the main site is not publically accessible, running along the southern boundary is Salmon's Brook, on the other side of which is the newly developed SUDS area providing walking routes. Running through the SUDS area, along the south side of the Brook, is the new Quiet way cycle path which will provide a cycle route connection direct between the Meridian Water development and Enfield Town.
- 2.6 The site is accessed via a single point on Bury Street West and has a low level accessibility (PTAL 2), with the adjacent A10 trunk road linking to the A406 North Circular to the south and the M25 Motorway to the north. The site is approximately 1km south of Bush Hill Park railway station and there are two bus stops within 400m of the Site; Great Cambridge Road/Bury Street West and Cambridge Terrace.

3. Proposed Development

- 3.1 This application seeks planning permission for the demolition of the existing buildings and structures, for the erection of 50 residential units comprising mix of 2 and 3 storey detached and semi-detached houses with associated landscaping and amenity including sub-station. The development would also include the construction of a new road with vehicular access to Bury Street West.

- 3.2 The proposed new housing development specifically comprises of the following:

50 new residential houses (C3):

- 18 x 2-bed houses;
- 25 x 3-bed houses; and
- 7 x 4-bed houses.

This would also include 74 residential parking spaces comprising:

- Houses: 70 spaces (1 space per 2-bed; 1.5 spaces per 3-bed house and 2 spaces per 4-bed house); and
- Bowls Club: 4 spaces.

Dedicated secure residential cycle parking for 100 spaces:

- 2 per house; and

- 36 visitor spaces.

New publicly accessible open space of approximately 4,830sqm.

Associated new roads/streets, landscaping and drainage works.

- 3.3 The proposed scale and massing across the site has been developed to respond to its surrounding context and to create a link between the form and scale of the heights and character of the nearby existing buildings.
- 3.4 The proposed massing of the development is focused to the north and east of the site. The southern end of the site surrounding Salmons Brook is proposed as open publicly accessible landscape, which will allow the development to retain its openness and reduce the visual impact of the proposal on the surrounding area.
- 3.5 The proposed development consists of two roof heights based on either a two storey or three storey dwelling, at 8.451m and 11.076m respectively above ground level. The three storey massing is focused towards the centre of the scheme, with two storey dwellings located closer to the edge boundaries, helping to minimise overshadowing, and allow sunlight and daylight to the existing neighbouring properties. The scale of the proposed heights have been influenced strongly by the existing character of the local area, which consists largely of two and three storey dwellings.
- 3.6 The two storey dwellings proposed to the northern end of the site respond to the surrounding housing along Bury Street West. Lowering the height from three to two storeys in this location respects the proximity to the adjacent properties, whilst also being subservient to Salisbury House and therefore also respecting the existing heritage context. The proposed dwellings along Bury Street West would frame the entrance to the proposed development along the street.
- 3.7 All proposed dwellings are designed with a pitched roof, which has been taken from the surrounding traditional pitched roof houses within the local context as well as the agricultural buildings formerly on site. The pitched roofs also help to reduce overshadowing, with the upper most storey of each dwelling type sitting within the roof eaves, allowing the height of the proposed dwellings to be reduced. The stepped layout of the proposed dwellings affords sunlight and daylight to the rear gardens.
- 3.8 Brick was been selected as the primary material for its robustness, quality, appropriateness for residential use, as well as reflecting the wider context of the residential streets around the application site. The variety of brick colours have been chosen to complement each other as well as the proposed landscaping and surrounding existing context, while referencing the agricultural buildings formerly on site. The brick options illustrated provide a feel for the quality sought for this main component of the scheme.
- 3.9 The roofs will be pitched roofs clad in slate. A pitched roof was selected as a response to the form of the surrounding area. The top floors of houses will have flush fitting polyester powder coated steel frame rooflights to provide light into the spaces. These will be fitted with internal blinds. Hidden gutters will be utilised in conjunction with internal rainwater downpipes.
- 3.10 Large windows are proposed to be a high quality metal composite with double or triple glazing, dependent on the acoustic requirements. The frames will be in a dark

bronze anodized finish, and bound by brick lintels and cills. Metal acoustic louvres are proposed on a number of houses, where required.

- 3.11 The entrance doors will be robust painted solid hardwood front doors and articulated with a pressed metal surround. All external storage doors to bike stores and bin stores will be timber to match.

4. Planning History

- 4.1 14/00026/CEU - Use of site as a storage and maintenance depot and ancillary activities. (Granted 23.07.2014)
- 4.2 The agent on behalf of the Council conducted detailed pre-application discussion with the Council's various departments over the evolution of the design proposal, together with significant external discussion with the GLA and Historic England.

5. Consultation

- 5.1 In November 2015, the London Borough of Enfield adopted a Statement of Community Involvement (SCI), which sets out policy for involving the community in the preparation, alteration and review of planning policy documents and in deciding planning applications.

Paragraph 3.1.1 of the adopted version sets out the expectation of the Council:

"The Council aims to involve the community as a whole: to extend an open invitation to participate but at the same time ensure that consultation is representative of the population. To achieve this, a variety of community involvement methods will need to be used. Targeted consultation of stakeholders and interest groups, depending upon their expertise and interest and the nature and content of the Local Plan documents, or type of planning application, will be undertaken."

Paragraph 5.3.6 goes on to state:

"In the case of 'significant applications', additional consultation will be carried out depending upon the proposal and site circumstances:

Developers will be encouraged to provide the community with information and updates on large scale or phased developments using websites, public exhibitions and newsletters"

- 5.2 The agent, on behalf of the Council has submitted a Statement of Community Involvement as part of this application to demonstrate how they engaged with the local community. The applicant undertook a public consultation with the local community and the following local stakeholders have been included:

Local residents and businesses
Bush Hill Park Residents Association
Friends of Bury Lodge Gardens
Bury Lodge Bowls Club
Bush Hill Park Ward Forum
Ward Councillors
Greater London Authority (GLA)
Transport for London (TfL)
Historic England

Enfield Heritage
Conservation Advisory Group (CAG)
Environment Agency

- 5.3 The agents also invited local residents and interested parties to view information that illustrated details of the site, the planning framework, and the design evolution of the proposals. Local residents were invited to attend a public exhibition to view the proposals and discuss the scheme. Three rounds of engagement with the local community were undertaken in October 2014 (Initial Design Proposals), March 2015 (Revised design proposals) and November 2016 (Proposed development).
- 5.4 Between 2500 and 3000 residents of the local area were invited to each event through door to door leaflet drops, invitation letters and adverts in local newspapers. The events took place in Salisbury House adjoining the site and the responses received have influenced design evolution of the proposal and was one of the reasons for the overall reduction in the number of units on site from 130 approximately in 2014 to 50 units presently.
- 5.5 Beyond the public engagement of the applicant, as part of the planning process the Council planning department have undertaken two public notifications of the application in February 2017 and again in August 2017 following a review of the proposals in light of the Governments Housing White paper. While potentially increasing housing numbers to maximise housing delivery was the thrust of the white paper review, in light of the input from the local residents, interest groups and the GLA, the number of dwellings and layout remained as submitted, with only minor design alterations to refine and enhance the elevational treatment being made.
- 5.6 Three sets of site notices were displayed both in February 2017 and again in August 2017 and together with 63 statutory, non-statutory consultees and local groups, with 186 neighbour notification letters were sent out to local residents.

Internal Consultation

- 5.7 Traffic and Transportation: Following detailed pre-application discussion officers raise no objection subject to condition. See transport section of this report for further details.
- 5.8 Environmental Health: Officers raised no objection.
- 5.9 Strategic Planning (Policy): Officers raised no objection.
- 5.10 Housing: Officers welcome and support the proposed development of 100% family sized units and raise no objection.
- 5.11 Heritage and Design: Following detailed pre-application discussions with Historic England and CAG, officers consider that as the development will pull buildings away from Salisbury house creating a larger garden context for the listed building, no objection has been raised subject to condition.
- 5.12 Urban Design: The Urban design team has worked closely with the applicant during plan process and on the detailed design of buildings including external appearance of and layouts of houses. Following these pre-application discussions throughout the whole process with external bodies and planning colleagues, officers raise no objection subject to condition.

- 5.13 SuDs: Concerns were initially raised however following discussions with the applicants consultants the issues were resolved and officers raise no objection subject to condition.
- 5.14 Economic Development: Officers raised no objection subject to an appropriate skills and employment plan being secured by condition.
- 5.15 Regeneration: Officers raised no objection.
- 5.16 Education: Officers raised no objection.
- 5.17 Trees: Following detailed discussion and concerns being addressed throughout the design process, officers raise no objection subject to condition. It is suggested that when addressing the conditions that the tree pit details are re-considered for the tree planting in highway/parking areas, suggesting instead that a 3d geo-cellular structural crate system is used so as to provide an adequate tree root environment to ensure the successful establishment and long-term health of the trees and associated eco-service benefits whilst providing an appropriate supporting structure for vehicular traffic without being compromised by future tree root growth.
- 5.18 Health: Education: Officers raised no objection.
- 5.19 Energetik: The Council setup energy company welcomes the development but consider the location prohibitive to connect to the local energy centre.

External Consultation

- 5.20 Greater London Authority (GLA): Consultation with the GLA had taken place throughout the pre-application process, however once a referable planning application has been submitted there is a two-stage process and any resolution that the Planning Committee make will be referred back to the Mayor for his consideration. In summary, while the application is generally acceptable in strategic planning terms, it does not fully comply with the London Plan. The following comments were received in response to the Stage One consultation, dated 3rd April 2017.

Points raised by the GLA:

- Metropolitan Open Land: The proposal on previously developed land would make the MOL less distinguishable from the built up area and would reduce the openness of the MOL. The proposal would therefore cause harm, which should be afforded substantial weight; however the harm would be relatively limited, and therefore are considerations weighting in favour (deliverability of the scheme by the Council; the improved setting of Grade II* listed Salisbury House; significant affordable housing; significant family homes; high design quality; and improved publically accessible landscape), which demonstrate very special circumstances.
- Housing: The principal of residential use is consistent with London Plan policies, and is supported. The density and play space provision are supported.
- Affordable housing: The applicant was strongly encouraged to increase the number of family sized affordable housing units which was addressed during the discussions.
- Historic environment and urban design: The proposals are of a high quality and are supported. No harm will be caused to heritage assets.

- Inclusive design: The Council should secure M4 (2) and M4(3) accessibility requirements by condition.
- Transport: A construction logistics plan should be secured by pre-commencement condition and approved in consultation with TfL. The Council should secure, enforce, monitor, review and ensure the funding of the travel plan.
- Climate change: The carbon dioxide savings exceed the on-site target set within Policy 5.2 of the London Plan; however the applicant should provide the 'be lean' DER and TER worksheets; and provide the 'be green' DER worksheet this should be conditioned.

- 5.21 Transport for London: TfL consider that the proposed trip generation would be acceptable and that the development will have a minimal impact on the road network. They consider that the number of parking spaces proposed is at the upper end of the London Plan standards, however is reasonable given the low PTAL. No objection has been raised subject to condition.
- 5.22 Historic England: Detailed pre-application discussions have taken place with H.E and therefore the applicant, together with Council officers have worked through the concerns raised, namely the context of Salisbury House and the quantum of development being reduced. No objection has been raised subject to archaeological conditions and informatives.
- 5.23 Environment Agency: Raise objection due to the potential impact of the proposed development on Salmons Brook. Concerns raised include: Buffer zone along the brook with native species planted to enhance the ecological value of the river corridor; updating the ecological survey; the bridge being set back further from the top of the bank to maintain connectivity along the river allowing passage of animal; and impact of the fishing platform. Officers consider that the objections can be addressed by condition.
- 5.24 Thames Water: Raise no objection subject to informatives.
- 5.25 Metropolitan Police: A number of concerns have been raised however these could be addressed by condition.
- 5.26 UK Power Network: Raise objection as there are two 33/11kV transformers on site which produce low frequency noise at 100 and 200Hz which could disturb future residents. This could however be mitigated should it be necessary.
- 5.27 Friends of Bury Lodge Gardens: Concern has been raised regarding a number of issues including: impact to local Ecology, loss of trees and the potential impact of the proposed development on the use of Salisbury House for events.

Officer comments: The issues raised were fully considered during the development of the proposals and while the application would propose enlarging the Salisbury House garden which has been welcomed by most groups, there is not additional funding available for alterations to the access or further enhancements at this stage. In relating to loss of trees and ecology impacts, the Councils trees officer considered the this matter has been satisfactorily addressed within the application and raises no objection. The whole of the proposed development is considered to enhance the general ecology of the site over the existing depot.

- 5.28 Conservation Advisory Group: The development is supported but would encourage funding in relation to the Maintenance of Salisbury House.

Officer comments: As mentioned above while monies for the upkeep and enhancement/maintenance of Salisbury House would be welcomed, there is not any additional funding at this stage.

- 5.29 Bury Lodge Bowls Club: Supports the proposed development but have raised concerns regarding the noise and disturbance during construction and the maintenance of the landscaping.

Officer comments: There would be a construction management Plan to be submitted and approved by condition, should planning permission be granted. This would have to address the access and disturbance issues in relation to adjoining occupiers of the site.

Public Consultation

- 5.30 A total of 186 letters were sent to notify neighbouring properties of the proposed development in February 2017 and then again in September 2017, following a review of the development. In addition, a 3 site notices were posted surrounding the site In February 2017 and again in September 2017 together with press notices in the Enfield Advertiser.

- 5.31 To date a total of 6 objections have been received from 3 local residents/property owners raising the following concerns:

- Affect local ecology
- Close to adjoining properties
- Conflict with local plan
- Development too high
- General dislike of proposal
- Inadequate public transport provisions
- Increase in traffic
- Increase of pollution
- Loss of light
- Loss of privacy
- Noise nuisance
- Out of keeping with character of area
- Potentially contaminated land
- Strain on existing community facilities

- 5.32 The points raised have been addressed within the body of the report, but to expand on the objections raised:

The depot site which has been unused for a number of years, may be better used for the provision of care facilities for the elderly residents of The Borough and thereby relieve some of the pressures on the NHS Hospitals currently at breaking point. This does not seem to have been included anywhere in the Design Brief, and hospitals are not mentioned in the application whereas Schools and GP's are.

Officer comments: **There is a significant shortage of family sized and affordable housing within the borough. The decision was taken by the applicant to address this and this is what is in front of members to determine, not what could have been.**

Adjoining properties such as Lynford Terrace were missed in the original mail drops and continue to be ignored on some of the relevant drawings associated with the application. Perhaps most inconsiderate is the lack of approach by any of the design team to local existing residents, they seem to prefer computer projections and not

see for themselves the likely effects of intrusion, noise, overlooking and shadow effect at low sun angles etc.

Officer comments: **The submitted drawings in front of members show the proximity to Lynford Terrace. All other issues mentioned were fully considered as part of the design process (see D & A) and have included a daylight/sunlight assessment which shows the proposed development would have a minimal impact on neighbouring amenity.**

The effect on local ecology is easy to see with the blatant approach to the adjacent SUDS scheme before approval was given and building on MOL designated land. This of course removes a large amount of potential use by the general public. Some of the properties are for sale and some for rent. It has not been disclosed as far as I can see if those for sale are to be Freehold or Leasehold and there seems not to be an allowance for essential key staff although some affordable housing is indicated. Financial data is not provided for sale prices, rents or indeed building costs for the high quality flagship constructions. The net result will produce an Island site.

Officer comments: **Ecology has been fully addressed within the submission and the new dwellings would be built on previously developed land. In relation to mix, tenure and viability, they are addressed within the report as submitted by the applicant which is policy compliant in relation to affordable housing.**

The development mass is still too high, just look at the density of the proposals and consider safety for the pedestrians mixing with cyclists and motor traffic. Where can we buy half cars for the one and a half parking bays? There is no mention of the expected population only the number of beds and therefore it is impossible to even guess the number of vehicles to be allowed for either parking or site access and the effect on the local road traffic. At open forums held in Raglan School it was said that all parking would be on-site with no overspill to local roads.

Any increase in local traffic will make the already extensive jams even worse and add to the pollution. I suggest that the local traffic survey data is flawed being based on observations dated just before Christmas and possibly affected by school holidays.

The noise data observations are I consider of little use being well out of date for the traffic increase during past year. This has been made worse by the road works along Ridge Avenue, Village Road and Church Street causing traffic Jams, congestion on all local roads pollution and noise as well as dangerous conditions.

The Air Quality assessments are I believe questionable and/or flawed because they are formed from data obtained from remotely sited equipment and not strictly site specific as was previously promised. The site is located alongside the A10 which suffers from almost constant traffic jams with a mix of traffic.

Surely there will be a high level of pollution from the exhausts as well as braking, idling engines and acceleration.

No account of the most serious exhaust products (the PM two point five, very small particulates) appears to have been taken.

No account of the Toucan Crossing has been made which of course will add to the problems.

No account of dense black smoke from bonfires on the allotments has been taken there is a documented history here with Enfield Environmental Health Department

that pass the problem over to the Parks Department as they should enforce the terms of the lease but take time to investigate and do not necessarily see the worst situations. These smouldering type fires (often unattended) are known to produce carcinogenic smoke. This is supposed to be a smoke free Zone but is not enforced.

Windows have to remain closed at times because the smoke and smells are too much to cope with.

Vibration measurements have not been taken and in my opinion should have been. There is a long history of vibration problems affecting local properties with TFL. It is well documented with TFL over several years due to failing road surfaces caused by the amount and weight of traffic. Remedial repairs take many months to effect.

Officer comments: **As set out in the report and clear from the submitted elevations, the proposal is comparable in scale to the surrounding properties. Transport, Environmental Health the GLA, TfL and the Environment Agency consider these matters acceptable.**

From earlier Council provided information; it seems that there is almost a certainty of contaminated land due to cross connected drains and past spillage etc. This must be treated with great care during excavations, spoil removal and construction. The recreation areas must be inspected and cleared as necessary for public safety.

Officer comments: **This will be addressed by condition.**

6. Relevant Policy

6.1 Development Management Document

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|-------|---|
| DMD1 | Affordable Housing on site capable of providing 10 or more units. |
| DMD3 | Providing a Mix of Different Sized Homes |
| DMD6 | Residential Character |
| DMD8 | General Standards for New Residential Development |
| DMD9 | Amenity Space |
| DMD10 | Distancing |
| DMD37 | Achieving High Quality and Design-Led Development |
| DMD44 | Conserving and Enhancing Heritage Assets |
| DMD45 | Parking Standards and Layout |
| DMD47 | New Roads, Access and Servicing |
| DMD48 | Transport Assessments |
| DMD49 | Sustainable Design and Construction Statements |
| DMD50 | Environmental Assessment Methods |
| DMD51 | Energy Efficiency Standards |
| DMD55 | Use of Roof Space/Vertical Surfaces |
| DMD56 | Heating and Cooling |
| DMD58 | Water Efficiency |
| DMD59 | Avoiding and Reducing Flood Risk |
| DMD60 | Assessing Flood Risk |
| DMD61 | Managing Flood Risk |
| DMD62 | Flood Control and Mitigation measures |
| DMD64 | Pollution Control and Assessment |
| DMD65 | Air Quality |
| DMD66 | Land Contamination and Instability |
| DMD72 | Open Space Provision |
| DMD73 | Children's Play Space |
| DMD79 | Ecological Enhancements |

| | |
|-------|----------------------------|
| DMD80 | Trees on Development Sites |
| DMD81 | Landscaping |

6.2 Core Strategy

| | |
|-------|---|
| CP2 | Housing supply and locations for new homes |
| CP3 | Affordable housing |
| CP4 | Housing quality |
| CP5 | Housing types |
| CP20 | Sustainable energy use and energy infrastructure |
| CP21 | Delivering sustainable water supply, drainage and sewerage infrastructure |
| CP22 | Delivering sustainable waste management |
| CP25 | Pedestrians and cyclists |
| CP30 | Maintaining and improving the quality of the built and open environment |
| CP31 | Built and Landscape Heritage |
| CP32: | Pollution |
| CP46 | Infrastructure Contribution |

6.3 London Plan (March 2015) (FALP)

| | |
|-------------|---|
| Policy 3.3 | Increasing housing supply |
| Policy 3.4 | Optimising housing potential |
| Policy 3.5 | Quality and design of housing development |
| 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 on schemes |
| Policy 3.13 | Affordable housing thresholds |
| Policy 5.2 | Minimising carbon dioxide emissions |
| Policy 5.3 | Sustainable design and construction |
| Policy 5.7 | Renewable energy |
| Policy 5.9 | Overheating and Cooling |
| Policy 5.11 | Green Roofs and Development Site Environs |
| Policy 5.13 | Sustainable drainage |
| Policy 5.14 | Water quality and wastewater infrastructure |
| Policy 5.15 | Water use and supplies |
| Policy 5.16 | Waste self sufficiency |
| Policy 6.9 | Cycling |
| Policy 6.10 | Walking |
| Policy 6.13 | Parking |
| Policy 7.2 | An inclusive environment |
| Policy 7.3 | Designing out crime |
| Policy 7.4 | Local character |
| Policy 7.5 | Public realm |
| Policy 7.6 | Architecture |
| Policy 7.8 | Heritage Assets and Archaeology |
| Policy 7.17 | Metropolitan Open Land |

Other Relevant Policy

6.4 National Planning Policy Framework

The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

In addition, paragraph 173 of the NPPF states that in the pursuit of sustainable development careful attention must be given to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

6.5 National Planning Practice Guidance

On 6th March 2014, the Department for Communities and Local Government (DCLG) launched the National Planning Practice Guidance (NPPG) to consolidate and simplify previous suite of planning practice guidance. Of particular note for members, the guidance builds on paragraph 173 of the NPPF stating that where an assessment of viability of an individual scheme in the decision-making process is required, decisions must be underpinned by an understanding of viability, ensuring realistic decisions are made to support development and promote economic growth. Where the viability of a development is in question, local planning authorities should look to be flexible in applying policy requirements wherever possible.

6.6 Other Material Considerations

Housing SPG

Affordable Housing SPG

Providing for Children and Young People's Play and Informal Recreation SPG

Accessible London: achieving an inclusive environment SPG;

Sustainable Design and Construction SPG;

Mayor's Climate Change Adaption Strategy; Mayor's Climate Change Mitigation and Energy Strategy;

Mayors Water Strategy

Mayor's Ambient Noise Strategy

Mayor's Air Quality Strategy
Mayor's Transport Strategy;
London Plan; Mayoral Community Infrastructure Levy

7. Analysis

7.1 The main issues for consideration regarding this application are as follows:

- Principle of the Development on MOL;
- Scale and Density;
- Design and Impact on the Character of the Surrounding Area and Heritage Assets;
- Neighbouring Amenity;
- Proposed Type and Mix of Units;
- Standard of Accommodation and Private Amenity provisions;
- Traffic, Parking and Servicing Issues;
- Affordable Housing and other Contributions; and
- Sustainability.

Principle of the Development

- 7.2 The application site has had a number of uses, most recently as a Council depot which included a number of buildings, structures and associated hardstanding to the north of Salmons Brook. This forms part of the wider site, on which the development is proposed, which is considered as 'previously developed land', comprising a former Council depot and plant nursery prior to that use. It is not excluded by the NPPF definition of previously developed land, since structures and fixed surface structures remain and have not blended into the landscape.
- 7.3 London Plan Policy 7.17 Metropolitan Open Land states that the Mayor strongly supports the current extent of MOL and its protection from development having an adverse impact on the openness of MOL. This policy ascribes the same level of protection to the MOL as in the Green Belt, and states that inappropriate development should be refused except in very special circumstances. It also sets out that any alterations to the boundary of the MOL should be undertaken by Boroughs through the LDF process.
- 7.4 Consequently, limited infilling or the partial or complete redevelopment of the site may not be inappropriate, as long as this would not have a greater impact on the openness of the MOL and the purpose of including land within it. The NPPF states that inappropriate development is harmful to the Green Belt (and also therefore to MOL) and should not be approved except in 'very special circumstances', which will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 7.5 The proposed development would be located on the area to the north of the total MOL designated land. The proposal would therefore retain a large section of land to the south of the site as public open space. Public open space totals 4,830 sq.m., whereas the site currently has no public access therefore retaining existing levels of public open space within the MOL.
- 7.6 There would however be an increase in the volume of buildings located on the site, from 2,786 cb.m. to 23,250 cb.m due to the increased scale of the development comprising of two and three storey dwellings over the existing lower rise structures.

That said there would also be a reduction in the total footprint, including hardstanding, from 10,395 sq.m. to 9,227 cb.m. Following significant discussions with the GLA, the volume of development has been reduced towards the south and east of the site compared to previous proposals for a significantly greater number of dwellings, initially proposed at 130, down to 50. This reduction also provides, a generous amount of public open space, and increased screening through tree planting to the south and the east. Generous private gardens would also be provided for all houses, and the streets are designed to appear as an integrated part of the landscape to maximise the openness of the site.

- 7.7 Notwithstanding the reduction in footprint, there would clearly be a reduction in the openness of the MOL, which would therefore be considered to cause harm. The issue would therefore be the degree of harm to the MOL of the proposed development. It is clear that while the development would have an impact, through the introduction of development into an area of designated MOL, making it less distinguishable from the built up area, it is recognised that this extends an existing area of development south of Bury Street West (to the east of the site), and that the site was also previously developed, therefore the impact would be relatively limited.
- 7.8 As it has been established that there would be some harm to the MOL, although relatively limited as this proposed would be on previously developed land and largely retain the openness, the proposal benefits must be weighted up against this.
- 7.9 Officers identify considerations weighing in favour of the proposal including: the deliverability of a scheme were the site identified as previously developed land; the conservation benefits arising from the improved setting of Grade II* listed Salisbury House; significant affordable housing; significant delivery of family housing; high design quality; and improved publically accessible landscape to the north of Salmon's Brook, where no publically accessible areas currently exist.
- 7.10 One of the main considerations in relation to MOL is the issue of visual impact and openness. It should be noted that case law has established that visual impact on MOL is quite different to the impact on the openness. In terms of visual impact, the new housing would be visible from surrounding areas, although it would be largely shielded by existing and new trees and vegetation, as well as existing housing. Where visible from Bury Street West, the proposed houses would be contextual to neighbouring development in terms of design and scale. A positive impact of the proposal would be the improved visual quality of the landscaped areas, both public and private, which are considered to be a substantial improvement of the existing depot. The earlier designs included uniform, straight rows of terraced housing, cutting off views over the site; however the proposed staggered arrangement for the houses, away from the main spine road now allow views through the site. Overall, the visual impact, and the harm arising from this, is considered to be very limited.
- 7.11 The provision of high quality, well designed family housing is key to improving and maintaining growth and there is a recognised need for the Borough to provide additional residential dwellings. This development would contribute to the supply of these additional units while also providing a good level of affordable housing.
- 7.12 The mix proposed is largely in accordance with the policy and given the site characteristics, achieving a higher proportion of family homes than would typically be delivered which is to be supported given that this reflects the findings of the Council's 2010 Strategic Housing Market Assessment (SHMA) on which the Core Strategy targets were based. 64% of the proposed units within the development are 3 bed or above and, the remaining 36% would be 2 bed houses, all of which would be suitable

for families. Officers consider the significant level of high quality family housing together with the level of affordable proposed would be a substantial public benefit of the development.

- 7.13 Officers consider that the proposal located on previously developed land would have a minimal impact on the purpose of including land within MOL as it would make the MOL less distinguishable from the built up area, although as mentioned above, this impact would be relatively limited. It could also reduce the openness of the MOL and as such, proposal would cause limited harm, which should be afforded consideration weight. However, the harm would be relatively limited, and there are significant considerations weighing in favour, which are considered sufficient to outweigh this harm and demonstrate very special circumstances.

Residential Use

- 7.14 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 798 new homes per year in Enfield between 2015 and 2025. The proposal would contribute to this and is supported in principle..
- 7.15 The application seeks permission for a residential development on the former depot element of the site. The development would provide 5,476sqm Gross internal Area (GIA) of residential floorspace through the erection of 50 homes across the site. The table below identifies the residential mix proposed:

| House Size/Type | Number of Units | Total GIA (sqm) |
|------------------------|------------------------|------------------------|
| 4-bed (7 person) | 7 | 1096 |
| 3-bed (5 person) | 25 | 2875 |
| 2-bed (4 person) | 11 | 898 |
| 2-bed (3 person) | 7 | 607 |
| Total | 50 | 5,476 |

- 7.16 The site has been arranged so that the new dwellings would be located to the north of the site, on the location of the existing depot and associated buildings. This relates to the adjoining residential properties along Bury Street West to the North and East, 4,830sqm of publically accessible open space would be located to the south surrounding Salmon's Brook.
- 7.17 The proposal would create 50 family homes comprising of individual detached and semi-detached houses with spacing including gardens between. This form of development, with traditional pitched roofs and maximum heights of 2 - 3 storeys, together with a staggered arrangement of buildings creates informal street layouts while maintaining a sense of openness across the site. As previously mentioned the layouts have been designed with generous streets and staggered buildings to maintain views between the buildings and the sky, giving a sense of space and openness which is critical within the MOL designation.

Housing Mix

- 7.18 The National Planning Policy Framework requires local planning authorities to deliver a wide choice of high quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand.
- 7.20 The London Plan reiterates this goal, Policy 3.8 states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New developments are required to offer a range of housing choices in terms of the mix of housing sizes and types. The London Plan sets a clear priority to create communities that are mixed and balanced by way of tenure, fostering social diversity, responsibility and identity (Policy 3.9). The London Plan goes on to seek to maximise affordable housing provision, with a 60/40 housing tenure split between social/affordable rent and intermediate rent or sale to create a balanced and affordable housing sector, with priority to be given to affordable family housing.
- 7.21 The Enfield Core Strategy Policy CS5, states that the Council will seek to ensure that new developments offer a range of housing sizes to meet housing need and plans for the following Borough-wide mix over the lifetime of the Core Strategy:

| House Size/Type | Private Sale | Affordable Housing |
|------------------------|---------------------|---------------------------|
| 1/2-bed (1-3 persons) | 20% | 20% |
| 2-bed (4 persons) | 15% | 30% |
| 3-bed (5-6 persons) | 45% | 30% |
| 4-bed+ (6+ persons) | 20% | 30% |

- 7.22 As the proposal is a Council led development, the emphasis has been on delivering family sized accommodation. The proposals include delivery of a high proportion of family homes (3-bed+) at 64% of the total, with the remainder of the houses being 2-bed and therefore also capable of accommodating smaller families. With this provision of a high proportion of family sized accommodation, the proposal will contribute significantly towards meeting strategic priorities to deliver new homes for families.
- 7.23 The evidence submitted as part of this application suggests a demand and need for family sized accommodation in the local area and that there has recently been, low levels of completions of larger units in Enfield. As such, having regard to the evidence, the proposed mix of housing sizes is considered appropriate, making an important contribution towards local housing need and demand. Furthermore the proposed mix of unit types and sizes proposed will increase housing supply and improve housing choice in this part of London, giving Housing Choice in line with London Plan Policies.
- 7.24 While the housing mix does not strictly comply with the Council policy, the emphasis on larger family houses with gardens, rather than flatted developments which are becoming much more common is welcomed.

Affordable Housing

- 7.25 Core Policy 3 of the Core Strategy and DMD1 set the affordable housing policy for the Borough. With reference to “Affordable housing on sites capable of providing 10 units or more” DMD1 developments should provide the maximum amount of affordable housing having regard to the borough-wide target of 40% and the need to provide an appropriate mix of tenures to meet local housing need and reflect a borough wide mix of 70% social/affordable rent and 30% intermediate.
- 7.26 London Plan Policy 3.9 ‘Mixed and Balanced Communities’ seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 ‘Negotiating Affordable Housing’ seeks to secure the maximum reasonable amount of affordable housing. The Mayor’s recently published draft Affordable Housing and Viability SPG introduces a threshold approach, whereby schemes meeting or exceeding 35% affordable housing without public subsidy are not required to submit a viability assessment. London Plan Policy 3.11 ‘Affordable Housing Targets’ requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale, with priority given to affordable family housing.
- 7.27 The application originally proposed 33% (by habitable room) affordable housing, or 40% (by unit), made up of 60% social rent and 40% intermediate. As this was slightly below the 35% (by habitable room) threshold stated in the draft SPG, the GLA encouraged a small increase in the number of family sized affordable units would allow the proposal to reach 35% by habitable room, a re-gigging of the floorplans has now increased this to 35%.
- 7.28 The proposed levels of affordable housing would be fully compliant with Enfield Core Strategy Policy 3 in terms of meeting the 40% policy target, and with London Plan Policies 3.12 and 3.13, in terms of maximising the delivery of affordable housing and delivering a 60/40 split of affordable tenures.

Density

- 7.29 As set out under the NPPF (para. 49) ‘housing applications should be considered in the context of the presumption in favour of sustainable development’. Plans should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. This proposal should be considered in this overarching national policy context. The London Plan sets a minimum ten year housing target for Enfield (2015-2025) of 7,976 dwellings (798 per annum), rising significantly in the recently published draft London plan to 1,876. The delivery of 50 dwellings here will make an important contribution to the Borough’s housing targets, in particular, and London’s overall housing need, in general.
- 7.30 London Plan policy 3.4 does require developments to optimise housing output for different types of locations in accordance with the adopted density matrix. The application site is considered to be in a suburban location which, given the low PTAL rating, would support a development of 35-95 units or 150-250 habitable rooms per hectare with a PTAL of 2-3. The density of the proposal is 27 units or 108 habitable rooms per hectare. Whilst this is slightly below the London Plan density range, it reflects the characteristics of the local area, respects the sensitivities of the site, and reflects the significant open space proposed within the southern part of the site. The density of the proposed development must also be considered in the context of the site being Metropolitan Open Land (MOL); this requires any development on the site to retain the openness of the land, in a similar way to green belt development.
- 7.31 This is below the London Plan density guidance. However, this is guidance only and the particular characteristics of the site, as well as its policy designation as a MOL,

mean that in this instance it is necessary to look beyond a purely numerical density assessment. There is inevitably a need to balance the option of maximising the site's potential to deliver housing against the impact on the openness of the MOL, as well as the likely consequences of a denser scheme. Taking all of this into account and following detailed discussions with the GLA in relation to larger developments the proposed density levels are considered to be appropriate for the designation of the land and in relation to the surrounding residential context, as such it is considered that the sites housing delivery potential has been optimised.

- 7.32 A numerical assessment of density is but one factor to consider in assessing whether the site can accommodate the quantum of development. 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.
- 7.33 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.
- 7.34 In this cases Officers have given significant consideration to the design and quality of the accommodation to be provided, the siting and scale of the development, its relationship to site boundaries, areas outside the site and adjoining properties, as well as the quantity, and quality, of amenity space to support the development. In all these respects, the development is considered to be acceptable.

Heritage Considerations

Statutory background

- 7.35 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

- 7.36 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.
- 7.37 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.
- 7.38 Paragraph 135 provides guidance in relation to non-designated heritage assets. The development proposal must also be assessed against the significance of the heritage asset, and “a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.
- 7.39 In addition, 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.
- 7.40 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 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.

Heritage Background

- 7.41 The site comprises a former Council maintenance and storage depot located on the south side of Bury Street West. It is dissected by Salmon Brook and includes an area of informal open space (Metropolitan Open Land) to the south. The site does not lie within the boundaries of a conservation area, but it is located immediately adjacent to Salisbury House (Grade II* listed) and associated structures (Grade II listed), and Bury Lodge Park (public open space with an area of formal gardens. The park was created on land associated with Bury Lodge; a late medieval/ early Tudor timber-framed house, demolished in 1936).
- 7.42 Salisbury House comprises an early 17th century; timber framed Manor House which constitutes an important and early example of a wealthy London Merchant's country retreat. The limited extent of the service quarters and the paucity of bed chambers suggest that it functioned as an occasional residence, with the estate run from the adjoining farmhouse. In the first half of the 17th century, Edmonton and Enfield, along with other then-rural parishes close to London, became popular as a place of recreation and retreat from the City. The area was highly convenient for the wealthy London merchant class, offering safety and security from disease and social stress and the opportunity for country pursuits close to the courtly life at Theobalds and on Enfield Chase. It is in this context that Salisbury House appears to have been built.
- 7.43 The present building was erected in c.1630, although a farm complex has been recorded on the site since the 13th century. Salisbury or Bury Farm developed as a demesne farm of Edmonton manor. In 1272, the medieval house possessed a garden, courtyard, and two dovecotes. By 1478, when it was leased out, it was a simple farmstead, consisting of a dwelling, barns for corn and hay, two stables, and a long sheep-house. In 1571, it was detached from the manor and granted by the crown to William Cecil, Lord Burghley, whose grandson William, Earl of Salisbury, sold it in 1614 to Roger Haughton of St. Martin-in-the-Fields. The land was sold again in 1637 and then remained in the same family until the late 19th century.
- 7.44 Salisbury House was conceived as a building to be viewed 'in the round'; a tall narrow partly timber-framed structure that is heavily jettied on all four sides, and forms a prominent landmark on the approach along Bury Street West. The adjoining medieval Bury Lodge (demolished 1936) was sited to the west, with the two buildings later divided in 1822.
- 7.45 Following the demolition of Bury Lodge, the eastern garden wall was retained and part of the back garden and its trees, was also kept as a secluded grass plot. Tiles from the roof of the Lodge were re-used for the shelters in the children's playground and for the elderly, and for the public convenience, which was built on the site of the stables and cart shed, to the west of Bury Lodge. The bell from the old house was attached to the roof of the elderly people's shelter, to be rung at park closing time. Several of the seats in the park were set in paving stones originally in the kitchen of the Lodge, and a circular stone, probably a millstone, also found in the house, was incorporated into crazy paving near the main entrance.
- 7.46 To the east, behind Salisbury House, a bowling green was formed and a pavilion erected; glass houses occupied a site to the south of the Bowling Green. A new entrance was created at the far north east corner of the site leading directly from

Bury Street to the bowling green area, and the garden to the east of Salisbury House was divided, possibly by a hedge. During the late 20th century, the garden to the east of the house was divided, and a utilitarian Council staff bungalow constructed on the eastern half. This was subsequently sold under 'right to buy' legislation.

i) Statutory Listed buildings and structures

7.47 Salisbury House is statutory listed (Grade II*) due to its architectural and historic significance of 'more than special interest'. Salisbury House as a whole and its setting is of *exceptional significance* as it possesses values that are both unique to the place and relevant to our perception and understanding of architectural and social history in a national context. It constitutes a rare survival and very intact example of a specific building typology found in the outer reaches of London. Of particular interest is the singular architectural form and the unusual plan form which indicates that the first or principal floor had only two rooms – a Great Chamber and an Inner Chamber. Internally, much of the original historic fabric survives including some panelling at first floor level (much reinstalled in 1956/7 though not to the original configuration) as well as an important fireplace of 1649 with wall paintings to the cheeks.

7.48 The boundary walls to the east of Salisbury House and south-west of Salisbury House Garden are also individually listed (grade II). The associated listed walls are a fundamental part of the site complex, but their value is *considerable*, rather than exceptional as they have now lost much of their context. The wall to the south-west is a fragment (2), while that to the east (1) is of considerable historic interest (albeit its value is greatly diminished by its complete replacement in modern materials).

1) The wall to east of Salisbury House. '*Probably C17 red brick wall, with sloped coping, later heightened by 7 courses and a further coping.*' This wall, probably of the early 18th century, was completely rebuilt in 2007.

2) The wall to south-west of Salisbury House Garden. '*Probably C17 red brick wall, with sloped coping, containing gateway with flanking battered buttresses.*'

ii) Gardens at Salisbury House and Bury Lodge

7.49 Salisbury House and Bury lodge Gardens have both been included on the *London Inventory of Historic Green Spaces*, prepared by the London Parks and Gardens Trust. All entries on the *Inventory* are being included on the Greater London Historic Environment Record and should therefore be recognised as 'heritage assets' as defined by the NPPF. The gardens of the house and Bury Lodge Recreation Ground are also included in the Council's local list of parks and gardens of historic interest.

iii) Setting

7.50 Setting is defined as 'the surroundings in which a place is experienced'. Special regard must be had by the decision-maker to the assessment of the impact of any development on the desirability of preserving the setting of any listed building (section 66 of the Planning [Listed Buildings and Conservation Areas] Act 1990). This statutory requirement means that the impact of proposed development within the setting of Salisbury House and associated listed structures must be assessed. The predominant guidance on development within the setting of heritage assets is contained within the English Heritage document *The Setting of Heritage Assets* (2011).

- 7.51 As heritage assets are irreplaceable, any harm or loss to a listed building or its setting requires clear and convincing justification. Paragraph 132 of the NPPF states that any substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, including grade I and II* listed buildings, and grade I and II* registered parks and gardens, should be wholly exceptional (there is no other specific mention in the NPPF of historic landscapes).
- 7.52 The demolition of Bury Lodge and later encroachment of unsympathetic development has been somewhat detrimental to the setting of Salisbury House, particularly the creation of the Municipal Recreation Ground which was further compounded by the erection of the Council Bungalow and former Council depot to the east.

In relation to setting, the Salisbury House Conservation Management Plan states,

“The setting of the house has fared much less well. Bury Lodge was demolished, leaving a section of historic (listed) garden wall disconnected from anything else, in a somewhat formless space to the west of the house, to which Salisbury House does not connect or relate (in part a consequence of the late 19th century division of the property), dominated by the public toilet block. Re-establishing the main lines of the historic enclosures and buildings could give context and purpose to what survives, a series of defined spaces with character and relationships to the street and Salisbury House. This should be a positive objective of the conservation of the site.”

Archaeological interest

- 7.53 The site of Bury Lodge as the precursor to Salisbury House and as an older structure of medieval origin is potentially of archaeological interest as a primary source of evidence about the original context of Salisbury House and the evolution of Bury Street. The site of the former Bury Lodge is therefore of some archaeological potential. Field evaluation would be necessary to ascertain whether it might, if of early origin with good survival of stratification, be of considerable significance, able to shed light on the regional evolution of small holdings of medieval origin. This view is corroborated by the findings of the Archaeological Desk-based assessment, which identified the presence of post-medieval to modern features within the Site and an undated ditch to the south of the Site recommended that that an archaeological watching brief may be undertaken during the groundworks for the proposed development.

Impact on Designated and Non-Designated Heritage Assets

- 7.54 Heritage Officers and Historic England were not adverse to the principle of development on the site but made clear that any proposed new development would need to take into account its sensitive location in the immediate setting of a listed building and structures. From the outset, Officers were keen that a development scheme for the site should be considered in tandem with proposals put forward in the Options Appraisal for Salisbury House, to ensure that the future of the building was not seen as an ‘after thought’ and left at a disadvantage by any developments. It was made clear that the heritage concerns did not solely revolve around the preservation and enhancement of the setting of the listed building and structures, but also in ensuring that the development contributed to and did not prejudice the viable future preservation of the heritage asset itself.

- 7.55 Advice from Heritage Officers has been predominantly guided by the Council's Management Plan for Salisbury House (2013). The Key Recommendations contained within this document are outlined below:

Key recommendations: Salisbury House Conservation Management Plan (2013)

Policy 1: When formulating proposals for development within the setting of Salisbury House, advice will be sought at an early stage from the Council's Conservation Officer and English Heritage.

Policy 6: Any new buildings or structures within the curtilage will be carefully designed to respect the setting of Salisbury House and, so far as possible to recover elements of the character of its historic setting. Special regard must be paid to matters of siting, bulk and massing, and the use of high quality, sympathetic, durable materials is essential.

Policy 10: The Council will ensure that works to improve access and accessibility do not harm, and preferably will enhance, the significance of Salisbury House.

Policy 13: Proposals for the future of the Council's depot on Bury Street should seek to enhance the setting and potential for use of Salisbury House, and consider the possibility of acquisition by agreement of the bungalow to the east of Salisbury House in order to do so.

Policy 14: The Council will review management practices in terms of grounds maintenance and prepare and implement a plan for the improvement of the setting of Salisbury House, including the removal of visually intrusive trees and management of hedges, ensuring the recovery of its prominence in street and public views.

Policy 15: The Council will seek to re-establish the spatial division between the western forecourt of Salisbury House and the recreation ground to the south, including, subject to archaeological evaluation, a new building of subsidiary scale on the footprint of Bury Lodge, if necessary to secure a sustainable use for the house.

Policy 23: Archaeological investigation and excavation of the Bury Lodge/Farm site will be encouraged and must be undertaken if development is proposed.

- 7.56 However, it was recognised that any development would have some impact on the significance of existing designated heritage assets and result in some harm to their setting, particularly that of Salisbury House. On balance, this harm was deemed to be less than substantial.
- 7.57 In line with the NPPF, 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.
- 7.58 Working closely with Historic England and the Architectural Team, Officers agreed several mitigating measures to offset this harm. A key concern was that any proposals should remove the existing bungalow (which was considered to greatly detract from the setting of Salisbury House and impact on key views into and out of the site), and return the original garden back within the control of the House. This was to be supported by a comprehensive landscaping proposal, to further secure

enhancements to the setting of the listed building. A business plan was proposed to consider in detail how the new garden space could be better utilised by Salisbury House as a future revenue stream.

- 7.59 The reinstatement of the original extent of Salisbury House Garden was also in line with recommendations made in the Salisbury House Conservation Management Plan, which states,

“To the east, the surviving part of the early 18th century garden does have a positive, historic relationship to the house. It should not be compromised by extension, and ideally the full extent of the garden on this side recovered, although that presents problems, since the bungalow occupying the eastern half is no longer in the Council’s ownership.”

- 7.60 Further mitigation measures proposed included:

Agreement on a design in place of the existing bungalow that would enhance the view towards Salisbury House

- Gardens to back onto the boundary with Salisbury House, to increase the green buffer zone between the extended garden and proposed development;
- A soft boundary using traditional planting to the south and east of the site on the Salisbury House side to improve the immediate setting of the listed building;
- The design near the site entrance should respect and enhance the setting of the listed brick garden wall and must ensure that no historic fabric would be impacted;
- Agreement that the proposed new development on the west side of the entrance way would be set back from the listed wall and also staggered back from the proposed development Opposite, to ensure that in views along Bury Street West from east and west that the listed wall would retain its prominence and its visual association with Salisbury House could still be read in context; and
- Parking spaces to be located on the western side of the access road creating views through to the back of Salisbury House and across the Bowling Green. These are views that have previously not been available to the public and better enable the building to be seen ‘in the round’ as originally intended.

Analysis

- 7.61 What must therefore be determined is whether any of the elements proposed will harm the significance of the heritage assets. 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.

- 7.62 The proposed development of the site would involve the removal of the existing bungalow building, which is noted as detracting from the setting of Salisbury House and the extension of the garden to the east, locating the eastern boundary approximately 27 metres from Salisbury House. In addition to providing much needed 'breathing space' to the listed building (and wall) the proposals also show a large lawn area which can be used for events associated with the current use of Salisbury House. It should be noted that a business plan for Salisbury house in order to provide revenue streams which could contribute to the maintenance of the buildings is currently being worked up.
- 7.63 The form and style of the design of the proposed development has been driven by the desire to avoid a heritage pastiche and create a simple, low maintenance space from which the listed building can be appreciated. The ongoing maintenance of Salisbury House has been raised a number of times by local groups, however such funding is not within the capacity this application to address and the above mentioned business case and events should address the sustainable future use of the building. However the development, will deliver a robust landscape infrastructure on which longer term and detailed plans for Salisbury House can be supported.
- 7.64 Historic England Officers working closely with the Council have been significantly involved throughout the evolution of the scheme, both in historic building terms, and also the point of acknowledging the sensitivity and importance of the landscape to the wider setting and MOL openness. Historic England raised a number of issues regarding the principle of the boundaries and general arrangements and through working collaboratively with the Council together with the architects, concerns have been addressed.
- 7.65 Having regard to the statutory requirement to give special attention to the desirability of preserving or enhancing the character or appearance of a conservation area (s.72) the proposal has been assessed against the identified heritage asset as set out above. It is considered that the development proposals will not lead to any harm to the designated heritage assets and would provide beneficial effect to these assets and their setting through the increased gardens surrounding Salisbury House, 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.

Summary

- 7.66 Although it is acknowledged that the proposals do lead to a degree of 'less than substantial' harm to the setting of the listed building and structures, the proposed scheme is of a high quality and sensitive in its approach, whilst providing tangible public benefits and enhancements to the immediate setting of the designated heritage assets.
- 7.67 Specifically, the enhancements include the reinstatement of the original garden to Salisbury House and the implementation of a new, more appropriate landscaping scheme, supported by a business plan for its commercial use; the replacement of poor quality buildings and the former Council Depot with a high quality housing; and the opening up new views towards Salisbury House. On balance, the benefits and

enhancements proposed under the Scheme are considered to outweigh the less than substantial harm caused as a result of development in this area.

Landscape and Visual Assessment

- 7.68 As set out above, one of the critical considerations in the overall assessment of the development proposals, given the MOL designation and the sensitivities of the site, is an understanding of the impact that they would have on openness of the site. As such a Townscape and Visual Impact Assessment (TVIA) was submitted as part of the application.
- 7.69 The purpose of the TVIA was to assess the likely effects of the proposed development on townscape features and the extent to which it would be visible. The purpose of the MOL Assessment was to assess whether the depot Site could be redeveloped without compromising the purposes for which the MOL was designated.
- 7.70 In relation to the Bury Street Depot site, the assessment identifies a number of significant beneficial landscape and visual effects associated with the development, relating to the removal of poor quality vegetation, disparate buildings, boundary treatments and structures with a commercial character and in varying states of repair, the public open space enhancements to the Salmon's Brook corridor and their replacement with well-designed homes of appropriate layout and form and an overall reduction in the extent of hardstanding and surfaces.
- 7.71 The wider Bury Street area would also see enhancements from the proposal, as the existing listed wall would be retained forming the frontage to Bury Street West and the existing depot entrance would be replaced with a new access road into the site and residential dwellings either side of the entrance would form an extension to the built edge on the south side of Bury Street West. Once the proposed street trees have matured the visual assessment concludes that the proposed development would create an enhanced frontage to Bury Street West which would have a residual effect of Minor significance, and a beneficial nature of change, on the townscape character of the Bury Street West Urban Area.
- 7.72 In terms of the Metropolitan Open Land, the development would have no physical effect on the Wider Local MOL. The proposed development would result in a change of Low magnitude and Moderate significance at year one, reducing to Very Low magnitude and Minor significance by year 20 once planting within the site has begun to establish. Given the nature of the change experienced, removal of various disparate buildings and structures within the depot and their replacement with a well-designed housing scheme accompanied by a comprehensive landscape scheme, it is considered that the nature of such changes would be Neutral and that, in the longer term, they would provide a net beneficial gain to the character of the Wider Local MOL Area.
- 7.73 In terms of the Grade II* Listed Salisbury House the Heritage Statement shows that the removal of buildings and structures associated with the depot and the refurbishment of the Salisbury House garden, would result in an overall net benefit to the setting of the listed building.
- 7.74 Overall officers agree with the conclusions of the Townscape and Visual Impact Assessment and consider that the visual impact of the proposed development would enhance the area and retain the MOL openness. The visual assessment confirmed that, while the introduction of the quantum of development proposed will mean that there will be a change in the character of the locality, that change will overall be a

beneficial one and the development will not have a greater impact on views than the existing buildings and on this basis the scheme can be supported.

Design and Appearance

- 7.75 Planning Policy from the Enfield Core Strategy and Development Manage Document to the London Plan places great importance on the need for development, most importantly residential, that are of high quality design, and highlights the role that this can play in creating successful sustainable communities.
- 7.76 The National Planning Policy Framework identifies that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making place better for people (paragraph 56). The NPPF states that planning decisions should aim to ensure that developments will function well and add to the overall quality of the area, establish a strong sense of place, respond to local character, create safe and accessible environments, and ensure good architecture (paragraph 58). It also outlines that decisions should seek to ensure that developments optimise the potential of sites (paragraph 58).
- 7.77 London Plan policy 7.1 states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. Policy 7.2 goes on to say that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. The principles of inclusive design which seek to ensure that developments achieve London Plan Policy 7.2 have been addressed throughout the evolution of the proposed development through substantial work with the architects, the GLA, Historic England and the Councils officers.
- 7.78 In general design terms, London Plan policy 7.4 states that developments should have regard to the form, function and structure of an area, including the scale, mass and orientation of surrounding buildings. The policy further states that buildings should provide contemporary architectural responses that:
- Have regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass;
 - Contribute to a positive relationship between the urban structure and local natural landscape features;
 - Are human in scale;
 - Allow existing buildings and structures that make a positive contribution to the character of a place to influence the existing character of the area; and
 - Are informed by the surrounding historic environment.
- 7.79 Enfield Core Strategy policy 30 and DMD 37 require all developments and interventions in the public realm to be high quality and design-led, having special regard to their context. They should promote attractive, safe, accessible, inclusive and sustainable neighbourhoods, connecting and supporting communities and reinforcing local distinctiveness.
- 7.80 As previously mentioned, the proposed development has been undertaken with significant care and consideration to deliver the highest quality design and proposals being considered, are a result of an extensive design process which officers consider are fully compliant with the design principles in national, regional and local policy guidance.

- 7.81 The proposed new dwellings, located to the north of the site with a close relationship to the existing urban area on Bury Street West, are detached or semi-detached modern style homes arranged around informal streets. The houses are spaced and with generous rear gardens to retain a sense of openness required by the MOL designation of the land and the semi-rural character is unique to the location, reflecting the special characteristics of the site in the setting of Salisbury House. This layout has been developed to allow views through the site and a feeling of openness.
- 7.82 The proposed houses are sited at a generous distance from Salmons Brook, allowing an area of new publicly accessible land adjacent to the SUDS Park and views towards Bury Lodge Gardens. The currently inaccessible Bury Street Depot will be opened up to the public with new public walking and cycling routes connecting into the Greenway where there will also be a new publicly accessible open space across the southern end which will be accessible to all future residents and the existing community. The proposal would deliver a flexible meadow which would provide space for a mix of activities, including informal play and recreation, exercise and temporary events.

Layout

- 7.83 A landscape led approach to the design has been taken to ensure the opportunities to enhance the MOL and setting of Salisbury House are at the forefront of the layout design. The overall strategy is to maximise the amount of public open space and create an informal, open setting for the new homes. Large private gardens are provided for all houses, and the streets are designed to appear as an integrated part of the landscape.
- 7.84 The proposed dwellings would be fully integrated within the wider green space and new meadow landscape. Soft landscape and tree planting will be directly in front of the homes with longer views to the landscape emphasised. The informal street pattern and treatment will ensure traffic calming, creating a pedestrian and cycle friendly environment around the new homes. Parking spaces will be integrated with the housing and arranged to minimise their impact on the street scene. The landscape will be designed to help define the public and private areas.

Scale and Mass

- 7.85 The proposed scale and massing has been carefully considered to optimise and make best use of this important brownfield site, whilst respecting the surrounding context, maintaining the openness of the MOL, and avoiding adverse impacts on neighbours. The proposed dwellings would range from between two and three storeys, with two storey dwellings located towards the edge of the site adjacent to the A10, the entrance and bowling green, with larger three storey dwellings located in the less sensitive areas in terms of openness. The massing is broken down by the spacing and pitched roofs, allowing for views between the buildings and interspersed tree planting.
- 7.86 The new homes are designed to an very high standard; meeting and exceeding internal space standards, providing generous private gardens, between 1 and 2 dedicated car parking spaces for each home, and decided cycling facilities for each dwelling. The high quality brick material, landscaping and environmental attributes are considered to result in a modern, high quality and attractive place to live. Parking is integrated into an informal street layout, which is defined with a high level of active frontage, clearly defined, to avoid cluttering the streets and minimise visual impact.

- 7.87 As mentioned in the heritage section of this report, the existing condition of the former depot provides a poor setting to Salisbury House and the character of the new development, with low rise houses of semi-rural nature set within open spaces, would provide a much more appropriate setting, which enhances its historic significance. The new layout will remove the insensitive bungalow, replacing it with houses which allow new views of Salisbury House and are subservient in scale.
- 7.88 The character and layout of the scheme will substantially enhance the setting of the Grade II* listed Salisbury House and will contribute towards its long term sustainability. By locating the new homes further to the east, a large area of the former Salisbury House garden is restored. Furthermore, the eastern side of the garden will be upgraded in an appropriate manner to provide an improved, flexible and low maintenance outdoor space.

Residential Design Standards

- 7.89 Members will be aware that minimum space standards for new development are set down in Policy 3.5 of the Mayor's London Plan. The purpose of this is to ensure that new homes are adequately sized, with room layouts which are well laid out, functional and fit for purpose. In this case, the proposed development will deliver all 50 units in accordance with, or in excess of, these space standards in full compliance with the London Plan.
- 7.90 The applicants have confirmed that the detailed design of the houses has been designed to take account of the Mayor's Housing SPG (2016), London Housing Design Guide and it will also meet Lifetime Homes. All dwellings will receive good levels of daylight/sunlight and officers consider that the development would provide the highest quality of new homes, meeting or exceeding good practice standards set out in the London Plan Housing Design SPG.

Residential Amenity Space

- 7.91 In addition to the internal space proposed for the dwellings within the development, there is also sufficient external amenity space to meet the likely demands of future residents. The proposal incorporates communal and private amenity space in accordance with London Mayor and Enfield standards, as set down in Policy DMD 9. As previously mentioned there would be a significant amount of public open space delivered by this development which could also be fully utilised by future residents.
- 7.92 In relation to private amenity space, this will be provided by private gardens for all the proposed units which would significantly exceed the guidance standards. Officers consider that a combination of the quantity and quality, of internal space and the external amenity area will ensure that the future residents all benefit from the highest quality of accommodation.

Children's play space

- 7.93 Policy 3.6 of the London Plan requires developments that include housing to make provision for play and informal recreation based on the expected child population generated by the scheme and an assessment of future needs. Further detail is provided in the Mayor's supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable play space to be provided per child, with under-fives play space provided on-site as a minimum.

- 7.94 The Council's Core Strategy policy 34 seeks provision of new and improved play spaces to address existing deficiencies and to meet future needs, with priority given to those areas where the deficiency of play space is considered most significant as identified in the Enfield Open Space Study (2010-2020). DMD policy 73 states that within areas deficient in children's play space, developments with estimated child occupancy of ten children or more will be required to incorporate on-site play provision to meet the needs arising from the development.
- 7.95 As the site is not within an area of deficiency of children's play space, there is no requirement to provide children's play space to address existing local need or to meet the additional needs arising from the development, however play space has been fully considered within the development.
- 7.96 The development includes a large area of new publicly accessible open space to the southern end of the site which is designed to be informal and as a meadow type environment. This space will be flexible to allow informal play by children of all ages. The new calm residential streets within the development will also be informal and available for use informally by children on the doorstep of their homes.

Public Open Space

- 7.97 The London Plan promotes the provision of new green infrastructure which is integrated into the wider network and links green infrastructure to improve accessibility. In accordance with London Plan policy 7.18, the Mayor will support the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency. This is supported by Policy 2.18 which highlights the importance of protecting, promoting and expanding London's network of Green Infrastructure.
- 7.98 Enfield Core Strategy policy 34 states that the Council will protect and enhance existing open space and seek opportunities to improve the provision of good quality and accessible open space in the Borough. This will be achieved by requiring improvements to open space provision through increasing the access to, quantity and quality of publicly accessible open spaces and supporting the community use of non-public open spaces. Policy DMD 72 requires all new major residential development to be accompanied by proposals to improve open space provision.
- 7.99 As previously mentioned the proposals include a new large publicly accessible open space, approximately 4,830 sqm across the southern part of the site. New public entrances from Bury Street West to the north and across a new footbridge to the south will open up the site to the public and provide access to the new public open space for new residents and those from the local neighbourhood.
- 7.100 Officers consider that this public open space will improve the quality of public open space availability in the local area, as well as more than meeting the needs of the future residents in terms of the amount available.

Impact on Trees

- 7.101 The Council's Tree Officer has been involved throughout the planning process in the discussions relating to the development of the site and is able to support the scheme. He feels that when considered as a whole, the development provides many significant benefits and enhancements when compared to the existing environment in terms of arboricultural amenity and biodiversity.

- 7.102 London Plan policy 7.21 considers, existing trees of value should be retained and any loss as the result of development should be replaced. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species. Enfield policy DMD 80 also resists the loss of or harm to trees covered by Tree Preservation Orders or trees of significant amenity or biodiversity value. Where there are exceptional circumstances to support the removal of such trees, adequate replacement must be provided.
- 7.103 The planning application was supported by a Tree Survey and Arboricultural Implications Assessment which recommends the removal of the existing generally low-quality trees to allow a well-considered, robust and sustainable tree planting scheme to be implemented. The objective for the proposed design has been to retain as many trees as possible, removing only trees due to ill health/safety reason or where they pose an insurmountable barrier to sustainable development.
- 7.104 It is proposed to remove twenty-nine Retention Category B trees along with approximately ninety Retention Category C trees and fourteen Retention Category U trees. The Retention Category C and U trees are mostly small self-sown trees and are hidden from public vantage points. The Retention Category B trees are slightly better quality specimens but also do not have a high amenity value due to being located away from public vantage points.
- 7.105 One tree (T89) requires minimal pruning to enable clearance from the nearest proposed building and a new hard surface is proposed within the RPA of two trees within G86. Given that a small percentage of the RPA's will be affected, the Arboricultural Assessment concludes that the impact will be minimal and no specialist construction methods are considered necessary.
- 7.106 All existing trees that are removed will be replaced with as much high quality tree planting as possible, planted at a generous size, and with species that assist in climate change mitigation and align with the local landscape character. Tree protection measures are specified in Arboricultural Implications Assessment that will ensure no negative impact on retained trees due to construction activity.
- 7.107 The removal of existing trees within the site will enable the redevelopment of vacant Brownfield land for a high quality housing scheme. In accordance with national and local planning policy, these benefits are considered to outweigh the loss of existing trees and will enable a high quality landscaping scheme to be implemented as part of the comprehensive development.

Ecology

- 7.108 The National Planning Policy Framework states the commitment of the Government to minimising impacts on biodiversity and providing net gains in biodiversity where possible. It specifies the obligations that the Local Authorities and the Government have regarding statutory designated sites and protected species under UK and international legislation and how this is to be delivered in the planning system.
- 7.109 London Plan Policy 7.19 states that indirect impacts of development need to be considered alongside direct impacts such as habitat loss. New development should improve existing, create new habitats or use design through the use of green or living roofs/walls etc, to enhance biodiversity and provide for its on-going management. The Councils Core Strategy Policy 36 states that the Council will seek to protect, enhance, restore or add to biodiversity interests within the Borough. Development

that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused (DMD 78).

7.110 The ecological interest of the application site was previously assessed through a Preliminary Ecological Appraisal carried out in June 2014. A scoping survey was conducted on 10 August 2016 to re-assess the site prior to works for protected species, invasive plants, trees and any other ecological features which may be impacted by the proposed work. The ecological scoping survey comprised an assessment of the potential of the site to provide habitat suitable for legally protected species, from field observations. As part of the application reports, this was inspected for field signs indicative of the presence of protected species. The purpose of this assessment was to identify potential constraints associated with protected species.

7.111 The potential for the habitats to support the following protected species was re-assessed:

- Bats;
- Badgers;
- Breeding birds;
- Water Vole;
- Great Crested Newt; and
- Reptiles.

7.112 As ascertained in the Preliminary Ecological Appraisal, the habitats within the proposed development footprint consisted of amenity grassland, bare earth and ephemeral short perennial vegetation, broadleaved woodland, buildings and hard standing, dense scrub, flowing water, hedges, introduced shrub, scattered mature trees, poor semi improved grassland and tall ruderal. The presence of three newly created ponds to the south of Salmon's Brook was of notable importance as they could be suitable for Great Crested Newts.

7.113 Based on the conclusions of the ecological scoping survey, the following mitigation measures are recommended to ensure the development complies with the relevant biodiversity legislation and policy:

- If any scrub or tree clearance is required in as part of the works, this should be carried out outside of the bird nesting season (October to February, inclusive). Where this is not possible, any vegetation to be cleared must be checked by an ecologist prior to clearance. If any nests are found, a buffer of vegetation must be retained until an ecologist has confirmed that young have fledged the nest.
- Works can proceed within the mown grassland over winter as there is a low population of reptiles on site. However, if works do not commence until early 2017, the area should be maintained as short grassland until works commence. If the scope of works change or further work is required, additional surveys may be required.
- The new ponds have suitability to support great crested newts (GCN), however, as they were only installed in the spring of 2016, it is unlikely that GCN will have colonised them. If works start in spring 2017 then no surveys will be required but exclusion fence will need to be installed around the works footprint to exclude GCN from the site as a precautionary measure. The fence will also be required to exclude reptiles during the construction phase. If the

works are delayed and do not start in 2017, it may be necessary to carry out GCN surveys of the ponds before the start of works. If GCN are found to be present, a mitigation licence from Natural England may be required.

- 7.114 These mitigation measures would be conditioned to ensure compliance with Enfield and London Plan policies.

Impact on Amenities of adjoining occupiers

- 7.115 The proposed development would create 50 new dwellings which range from 2 to 3-stories in height, comparable to the height of the surrounding properties. The vast majority of the proposed dwellings would be significantly far away from the adjoining closest residential properties Alder Lodge and Lynford Terrace, as to have no impact in terms of residential amenity.
- 7.116 However a small number of properties proposed at the entrance of the proposed development could have an impact on Alder Lodge. The four proposed semi-detached properties backing on to Alder Lodge face the flank elevation of this adjoining block of flats. At the closest point, the entrance house would be approximately 10m from the closest corner to approximately 15m from the other corner of the block, in relation to the second set of semi-detached dwellings.

Daylight/Sunlight

- 7.117 The BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of the site. Clearly there would be a higher expectation for daylight and sunlight in a rural or suburban environment than in a dense city centre location. The important factor in all cases is that the levels of daylight and sunlight are appropriate, taking into account all the planning policy requirements of the site.
- 7.118 As part of the application submission a daylight/sunlight report analysing the potential impact of the development on neighbouring properties. In relation to no.1 Lynford Terrace, due to the location and distance, the report indicates that the proposal is likely to have no material impact on the daylight and sunlight to this property or those on Bury Street West.
- 7.119 To the west of the site are the Bury Lodge Bowls Club and Salisbury House, an arts centre. The recommendations in the BRE Guidelines are primarily designed for residential properties, rather than non-residential premises, where there is usually a greater use of artificial lighting. However, the assessment states that these buildings are unlikely to be materially affected, since the outlook for the primary north and south facades of the Bury Lodge Bowls Club remains will remain largely open and Salisbury House is located at a sufficient distance from the proposal to avoid any particular reduction in light.
- 7.120 In relation to Alder Lodge, in terms of daylight, the analysis indicates that there would be a minor impact to a window serving a bedroom at ground floor level. However, the daylight distribution percentage would remain unchanged in the proposal, with 87% of the room still able to see the unobstructed sky at desk height, which is one of the daylight tests. Overall, therefore, this room would continue to receive a good level of daylight with the proposal in place, and any reduction in daylight would be likely unnoticeable by the occupants. The daylight and sunlight for the other rooms and windows within this property would be fully compliant with the BRE Guidelines.

7.121 Overall, therefore, most of the properties surrounding the site are located at such a distance that there will be no noticeable reductions in daylight and sunlight. Alder Lodge, located closer to the proposal, will experience small reductions in daylight and sunlight, which will be compliant with the BRE Guidelines, or sufficiently close to be considered acceptable. At the distances involved, officers consider the assessment to be an accurate reflection of the impacts and as such consider this acceptable.

Privacy

- 7.122 It is noted that while the owners of this block have objected to this development due to the impact on residential amenity, the occupiers of the blocks have not objected/commented to this development, however as the block includes both bedroom and Livingroom windows facing onto the rear of the proposed development, this has been fully assessed.
- 7.123 Along the side of Alder Lodge facing onto the rear elevations of the proposed semi-detached dwellings, is the vehicular access for the block of flats, as such it is considered that the existing arrangement is active and therefore privacy is limited for the ground floor units already. It is therefore considered that at ground floor level, the proposed dwellings would have no greater impact on privacy than the existing on site activity of the vehicular access. At first floor level there is a small single window onto the secondary bedrooms, while this would introduce a window at first floor level, being a small secondary windows, it is not likely that this would have a significant impact on neighbouring privacy, over the existing vehicular access impact. As such, in terms of privacy the proposed development is considered to have a minimal impact on neighbouring amenity, complying with Council policy.
- 7.124 In relation to Lynford Terrace the distances from the closest points, dwelling to dwelling would be approximately 25m, with an area sectioned off for trees and a proposed substation separating the properties, however the rear garden of Unit 30, does adjoin the rear garden of no.1 and as such it is considered that in terms of the amenity of the use of the garden would potentially have a minor impact as the existing garden adjoins the vacant depot. In terms of privacy as there would be a typical garden fence between the properties, the impact on the rear end of the garden is considered to be minimal and as the properties would be approximately 25m at the closest point, there would be sufficient distance to have no impact from potential overlooking/loss of privacy.

Highway Considerations

- 7.125 The application site has a Public Transport Accessibility Level (PTAL) level of 2 (poor) which indicates that the area is not well connected to public transport services. There is no controlled parking zone (CPZ) in the locality, however the existing site access located on Bury Street West, which is a classified road, has waiting restrictions to stop vehicles obstructing the access. The site has good access to the A10 trunk road linking to the A406 North Circular and the M25.
- 7.125 The proposed development has been designed through an extensive and detailed process to ensure that the trips generated as a result of the proposed quantum of development and amount of car parking can be accommodated safely within the existing highways infrastructure. Discussions on this matter have taken place with the Councils Transport department, the GLA and TfL who agree that it is not necessary to make any upgrades to highways infrastructure improvements surrounding the site.

- 7.126 As part of the submitted application a full Transport Assessment that assesses the impact of the Proposed Development on the local transport network. During the period in which the site was fully operational as a council depot it generated over 200 vehicles daily, consisting mainly of large goods vehicles (HGVs). In comparison the proposed development would produce a lower vehicle trip generation, therefore it is considered that it would have a negligible impact on surrounding roads. Whilst the trip generation forecasts indicate a small net increase in vehicular trips during the AM peak (equating to an average 1 additional vehicle on the network every 20 minutes), a net reduction will occur during the PM peak. It should also be noted that the vehicle trips would be private cars rather than HGV's.
- 7.127 When compared to the site in its current (vacant) condition, the Transport Assessment concludes that any highways impact would be negligible. Bury Street West currently experiences 10,772 vehicles per day and the proposal, should planning permission be granted, once complete and fully occupied, is expected to generate 121 vehicle (12 hour) trips, representing an increase in existing traffic levels of less than 1% which is considered acceptable.
- 7.128 The transport assessment concludes a negligible impact on highways. Responses received throughout the pre-application and formal application process show that the highway implications of the current proposal are one of the key areas of concern in relation to the planning application. As such, Officers have spent a significant amount of time seeking to understand how the development would impact on traffic movements and to provide a sufficient level of parking within the development for future residents. It should be noted that while the PTAL of the site is low, in an effort to promote sustainable transport initiatives and reduce the numbers of cars on our roads, the applicant has provided parking in line with the London Plan Standards.

Public Transport Impacts

- 7.129 Consideration has been given to the current and future capacity and demand for public transport in the area. It is estimated that the proposed development would generate a total of 64 passengers daily via the train and overground services, including an estimate of only 15 passengers on both the morning peak hour and the evening peak hour. As there are approximately four trains per hour in each direction serving the Bush Hill Park railway station there is sufficient capacity in the rail network to accommodate the proposal and mitigation is not considered necessary.
- 7.130 The site offers a good level of accessibility to pedestrians and cyclists who will benefit from an enhanced public realm within the development with improved connections to the surrounding pedestrian and cycle network through infrastructure investments. The application site is also currently served by frequent bus services (Routes 192, 217 and 231) which are located on Cambridge Road/Bury Street. These services provide links to Enfield Town Centre to the north and Waltham Cross and Tottenham Hale to the south. Two additional services (617 and W8) can be accessed from Bury Street. Bush Hill Park and Edmonton Green Railway Stations are also both easily accessible on foot, by bicycle or via a short bus journey. This demonstrates the accessibility of the site and the opportunities for travel by non-car modes.
- 7.131 It is estimated that there will be a daily total of 26 additional passenger trips on bus services, or passenger trips in the morning peak and 3 passenger trips in the evening peak. As there are approximately 18 buses during the morning and evening peak periods by the three routes in the vicinity of the site there is sufficient capacity in the bus network to accommodate the development and again mitigation is not necessary.

Servicing and Refuse

- 7.132 Policy 47 of the Councils Development Management Document indicates that, new access and servicing arrangements must be included in the detailed design of the scheme from the outset and must ensure that vehicles can reach the necessary loading, servicing, and parking areas. Layouts must achieve a safe, convenient and fully accessible environment for pedestrians and cyclists. New developments will only be permitted where adequate, safe and functional provision is made for refuse collection, emergency service vehicles and delivery/servicing vehicles.
- 7.133 Refuse vehicles will service the development using the existing access from Bury Street West. The layout of the proposed development have been fully considered in relation to larger refuse and servicing vehicles and the submitted transport assessment demonstrates that vehicle manoeuvres for the purpose of deliveries and servicing can be satisfactorily accommodated within the site. Vehicle swept path analysis to demonstrate that the access is able to facilitate the entry and exit of servicing and delivery vehicles were included within the application submission.
- 7.134 According to the Manual for Streets (MfS), Planning Authorities should ensure that new developments make sufficient provision for waste management and promote designs and layouts that secure the integration of waste management facilities without adverse impact on the street scene. The proposed refuse and recycle storage should blend in with the proposed layout and landscaping; complementing the street scene.
- 7.135 The standards require the design to ensure that residents are not required to carry waste more than 30m to the storage point, waste collection vehicles should be able to get to within 25 m of the storage point and the bins should be located no more than 10m from kerbside for collection. Detailed designs of the refuse and recycle storage must comply with these standards and the Refuse and Recycle Storage Guide Enfield (ENV 08/162).
- 7.136 Each dwelling would be provided with a refuse and recycling store within the property curtilage and integrated into the staggered layout of the housing, with collection taking place along each of the new proposed streets with the main point of access provided at the site entrance. Each store is designed to provide sufficient space for 3 wheeled bins including a 140litre (refuse), 240litre (recycling) and 240 litre (garden and food) bins, as required by Enfield's guidance. Each dwelling also includes internal storage provision within the kitchens.
- 7.137 In light of the need to ensure that servicing activity is carried out efficiently and does not create any adverse impact on the adjacent highway network, officers would require a condition for the submission and implementation of a Delivery Servicing Management Plan for development.

Walking and Cycling

- 7.138 Enfield planning policy and the London Plan promote development which encourages walking and cycling. The site is currently completely inaccessible and is proposed as part of this development to be opened up to the public, inviting pedestrians into the site to use the new public open space and encouraging pedestrian and cycle movements through the site to the new Greenway to the south of Salmon's Brook.

- 7.139 Access to the cycle parking areas will be taken via the existing access on Bury Street West and the proposed new pedestrian/cycle access to the south of the development, which will link into the proposed Great Cambridge Road/Salmon's Brook Crossing cycle route, which in turn will be able to access all the Enfield Quietway routes and enhance safer cycle access across the Borough. Based on the increased trip generation by the proposed use, the proximity of the site to a major Cycle Enfield route a financial contribution of **£118,125** will be secured via Unilateral Undertaking (UU) towards the provision of the neighbouring quietway.
- 7.140 In terms of the walking and cycling network, it is forecasted to generate 25 two way net walking trips on the network daily. A PERS (Pedestrian Environment Review System) Audit has been undertaken for the local area concluding that the existing pedestrian footways in the vicinity, and linking to key local bus stops, can support the additional walk trips and mitigation is not therefore required.
- 7.141 A draft Travel Plan is submitted as part of the application setting out further measures that will be adopted to encourage sustainable modes of travel and to ensure the promotion of sustainable transport measures, the submission of a full travel plan would be conditioned should planning permission be granted.

Parking Provision

- 7.142 The proposed parking provision has been carefully considered having regard to policies seeking to reduce reliance on the private car, policies setting maximum parking standards in relation to the accessibility of the site, reducing the impact on local highways, and meeting the likely demands arising from the proposed development. This has been considered in conjunction with the drive to deliver a high quality development scheme and residential environment which maximises open space.
- 7.143 A total of 74 car parking spaces are proposed. This is the most that the development can provide in accordance with the maximum parking standards in the London Plan. The spaces will be dedicated to the homes, with the breakdown being in full accordance with policy as follows:
- 1 space per 2-bed house;
 - 1.5 spaces per 3-bed house;
 - 2 spaces per 4-bed house. In accordance with policy the Proposed Development will also provide:
 - 7 Disabled Spaces (10%);
 - 14 Spaces (equipped with electric vehicle charging facilities); and
 - 14 Spaces (enabled with passive provision). There are 4 additional disabled parking spaces allocated for Bury Lodge Bowls Club, located directly adjacent to the new entrance from the site.
- 7.144 100 secure residential cycle parking spaces are also provided with each dwelling, with secure storage space for 2 bicycles in the rear gardens. A further 18 Sheffield bicycle stands, a total of 36 bicycle spaces, are also provided across the site for visitors parking.
- 7.145 A balance has been struck between providing enough spaces to meet the demands of future occupants, whilst ensuring that the number of car trips generated by the development will not adversely impact on local highways. The number of parking spaces is the maximum that could be provided without impacting on the quality of the streets within the scheme and without losing important public open space.

- 7.146 The scheme is designed to encourage more sustainable modes of travel other than private car, including walking and cycling, by creating new and attractive routes that connect into the future Greenway. Designing to discourage use of the private car is in accordance with Enfield's Core Strategy and London Plan objective to reduce travel by private car.
- 7.147 In line with the London Plan (March 2016), 20% of the total parking spaces should be provided as active electric vehicle (EV) charging points; with a further 20% passive EV charging spaces. This level of provision would be distributed across the entire site and would be required as part of the conditioned sustainable travel plan.
- 7.148 A car club bay should be provided within the development as part of the scheme. The car club scheme is an effective way of managing parking on site as well as ensuring and promoting sustainable transport as part of the development. The location of any car club bay needs to be identified and provided on a plan. In addition to encourage take up, there should be 2 years membership and suitable driving credit offered to every household. Evidence of the correspondence and the subsequent agreement with any of the providers would be required as part of the sustainable travel plan condition.
- 7.149 A detailed parking layout plan which shows the proposed location of all parking spaces including residential disabled bays, location of bowling club spaces, active and passive electric charging point bays and car club bays (as agreed with the car club operators within the borough) would also be secured by condition to demonstrate that all parking spaces would be provided according to the appropriate design standards.
- 7.150 Although a further 10%-20% of the total parking provision could be included to accommodate visitor parking, in this instance it is considered that there is spare capacity on street to cater for the demand for visitor parking. Officers consider that in transport and highways terms the proposed development has been well designed to deliver a development which would promote sustain transport within the borough.

Construction Logistics Plan

- 7.151 In order to ensure that the construction traffic generated by the proposed development does not affecting the functionality of the surrounding local highway network, a Construction and Logistics Plan will be required by condition.
- 7.152 Officers consider that the proposed development has been well considered in relation to the highways and transport implications on the surrounding area and future users of the site. The sustainable transport initiatives mentioned will be secured by condition to ensure the promotion of reduced private car use by future occupiers, in line with the Council policy and London Plan aspirations.

Sustainability and Renewable Energy

- 7.153 The National Planning Policy Framework states that development proposals are expected to comply with local requirements and should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and increase the use and supply of renewable and low carbon energy.

- 7.154 London Plan policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide (CO₂) emissions in accordance with the following energy hierarchy:
- Be Lean: use less energy;
 - Be Clean: supply energy efficiency; and
 - Be Green: use renewable energy. From 2016 the London Plan requires major developments to be zero carbon (Policy 5.2) in terms of 5.153the improvement on 2010 Building Regulations.
- 7.155 Future policies within the London Plan seek sustainable design and construction (Policy 5.3), require evaluation of the feasibility of decentralised energy (Policy 5.6), reduction in emissions through the use of onsite renewable energy (Policy 5.7) and promote innovative energy technologies (Policy 5.8). Policy 5.9 requires developments to minimise overheating through consideration of the cooling hierarchy.
- 7.156 Enfield's DMD policy 49 requires the highest sustainable design and construction standards, having regard to technical feasibility and economic viability. These policies require new developments to address the causes and impacts of climate change by minimising energy use, supplying energy efficiently and using energy generated from renewable sources (Core Strategy Policy 20 and DMD51), seeking zero carbon developments (DMD50), using decentralised networks where feasible (DMD52), and providing on-site renewable energy generation to make-up any shortfall where feasible (DMD53).
- 7.157 The potential to minimise energy usage has been considered throughout all stages in the developments design. An Energy Assessment was submitted as part of this application using the standard methodology in Part L1A of the Building Regulations and the London Plan.
- 7.158 Following the energy hierarchy defined by the London Plan and local planning policy, the assessment demonstrates that a 47% reduction in carbon can be achieved on-site. This would be achieved by minimising energy usage, through energy efficiency, including through passive design, active measures and measures to reduce overheating.
- 7.159 CHP within the development was considered however due to the small scale of the proposal this was deemed not to be viable and the distance from the Council energy centres was considered too great to be connected up to a decentralised heat and power network, however it is feasible to incorporate renewable energy generation via PV panels and, taken collectively, this leaves 45 tonnes/CO₂/annum in remaining emissions. This is considered an very good level of emissions reduction achieved through the most appropriate measures for the site.

Flood Risk

- 7.160 The National Planning Policy Framework requires a Flood Risk Assessment (FRA) to be submitted with planning applications for all development sites over one hectare in area and development sites of any size within Flood Zones 2 and 3. The FRA should determine the risks of flooding at the Site from all sources including rivers, the sea, sewers and groundwater.
- 7.161 London Plan Policy seeks to minimise flood risk issues in a sustainable way Enfield's Core Strategy states that they will take a risk-based approach to development and

flood risk, directing development to areas of lowest risk (Core Strategy Policy 28). The Council's Development Management Document Policy 59 states that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere. DMD Policy 60 states that site specific Flood Risk Assessments will be required for development proposals of 1 hectare or greater in Flood Zone 1.

- 7.162 In accordance with the NPPF and DMD Policy 60 a Flood Risk Assessment has been submitted as part of the planning application. It confirms that the site is not located within a flood zone, but that the Environment Agency's Flood Zone Map shows a limited area surrounding Salmon's Brook is located within the NPPF Zone 2 'Moderate Probability' and 3 'High Probability' flood envelope. The Environment Agency has provided modelled fluvial flood levels for Salmon's Brook for a number of flood events based on a 1 in 20 year, 1 in 100 year (plus climate change) and 1 in 1000 year event. The FRA concludes that, it is evident that any flooding would be confined within Salmon's Brook without encroaching onto the site. Furthermore the development has been pulled away from Salmons Brook as part of the open space within the development and as such the proposed dwellings should be sufficiently spaced to avoid any impact from this flooding.
- 7.163 There have been no recorded incidents of groundwater flooding at the site, despite permeable soil types being present and there is a limited potential for groundwater flooding to occur across the majority of the site. Borehole logs indicate that the water table is below 2.80m below ground level which is considered to be a sufficient depth below the Site and is not expected to rise and breach the ground surface during periods of heavy or prolonged rainfall.
- 7.164 There have been no historical incidents of surface water or sewer flooding at the site. However, it should be noted that the Depot has been subject to localised surface water flooding atop on top of the tarmac, the proposed hard landscaping would be permeable, reducing the potential of this taking place in future. The Environment Agency's Surface Water Flooding Map indicates that there is a very low to moderate flood risk across the site and as such officers are satisfied that the proposal would minimise flood risk.

Developer Contributions

- 7.165 A unilateral undertaking for the Sustainable Transport contribution of £17,365 and the Cycle Enfield contribution of £118,125 will be sought together with the other sustainable transport initiatives secured by condition.

Community Infrastructure Levy

- 7.166 As of the April 2010, new legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development.
- 7.167 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.

- 7.168 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.
- 7.169 This would result in a Mayoral CIL contribution of 5,370 sq.m x £20 = £107,400 x (BCIS CIL Index Formula)
- 7.170 This would result in a Borough CIL contribution of 5,370 sq.m x £120 = £644,400 x (BCIS CIL Index Formula)

8. Conclusion

- 8.1 The proposed development would provide a high quality residential environment for all future occupiers. All of the new dwellings have been designed to meet the Mayor's London Housing Design Guide in terms of size and layout. In addition, all of the new units would be designed and constructed to the Lifetime Homes Standards as far as is practicable.
- 8.2 The proposal is well considered in design terms and responds sensitively to the constraints of the site including the surrounding area and Metropolitan Open Land. It optimises the development potential while avoiding impact on the openness of the site. The design is of a high quality and will not have a detrimental effect on local or strategic views, or cause harm to local amenity in relation to an unacceptable loss of daylight/sunlight, sense of enclosure or loss of privacy. It is also considered that it would not harm conditions of on-street parking or prejudice conditions of the free flow of traffic and highway safety.
- 8.3 This is a sustainable development that would deliver substantial public benefit in terms of additional homes and much needed affordable housing. The development would be in general compliance with Council policy and there are no material considerations of sufficient weight that would suggest that the application should be refused. Officers are therefore recommending approval of the scheme in accordance with the presumption in favour of sustainable development as set out by the National Planning Policy Framework (NPPF).

9. Conditions

3 Years

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the decision notice.

Reason: To comply with the provisions of S.51 of the Planning & Compulsory Purchase Act 2004.

Approved Plans

2. The development hereby permitted shall be carried out in accordance with the approved plans, as set out in the attached schedule which forms part of this notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

Construction Management Plan

3. That development shall not commence until a construction methodology has been submitted to and approved in writing by the Local Planning Authority. The construction methodology shall contain:
 - a. Arrangements for wheel cleaning;
 - b. Arrangements for the storage of materials;
 - c. Hours of work;
 - d. Arrangements for the securing of the site during construction;
 - e. The arrangement for the parking of contractors' vehicles clear of the highway;
 - f. The siting and design of any ancillary structures;
 - g. Arrangements for the loading and unloading of plant and materials;
 - h. Scheme for recycling/disposing of waste resulting from demolition and construction works;
 - i. Enclosure hoarding details; and
 - j. Measures that will be taken to control dust, noise and other environmental impacts of the development in accordance with 'London Best Practice Guidance: The control of dust and emission from construction and demolition'.

The development shall be carried out in accordance with the approved construction methodology unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the implementation of the development does not lead to damage to the existing highway and to minimise disruption to neighbouring properties and the environment.

Contamination

4. Prior to the commencement of building works, a scheme to deal with the risks associated with contamination of the site shall be submitted to and approved, in writing, by the local planning authority. That scheme shall include all of the following elements unless specifically excluded, in writing, by the Local Planning Authority and the development shall then proceed in strict accordance with the measures approved.
 - a. A desk study identifying: all previous uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; potentially unacceptable risks arising from contamination at the site;
 - b. Site investigation scheme, based on (1) to provide information for an assessment of the risk to all receptors that may be affected, including those off site;
 - c. The results of the site investigation and risk assessment (2) and a method statement based on those results giving full details of the remediation measures required and how they are to be undertaken.
 - d. A verification report on completion of the works set out in (3) confirming the remediation measures that have been undertaken in accordance with the method statement and setting out measures for maintenance, further monitoring and reporting.

Any changes to these agreed elements require the express consent of the Local Planning Authority.

Reason: In order to ensure that the development does not pose an unacceptable risk to the quality of the groundwater.

Sustainable Drainage Strategy

5. The development shall not commence until a Sustainable Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The details shall be based on the disposal of surface water by means of a sustainable drainage system in accordance with the principles as set out in the Technical Guidance to the National Planning Policy Framework and should be in line with our DMD Policy SuDS Requirements:
 - a. Shall be designed to a 1 in 1 and 1 in 100 year storm event with the allowance for climate change;
 - b. Follow the SuDS management train and London Plan Drainage Hierarchy by providing a number of treatment phases corresponding to their pollution potential;
 - c. Should maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value;
 - d. The system must be designed to allow for flows that exceed the design capacity to be stored on site or conveyed off-site with minimum impact;
 - e. Clear ownership, management and maintenance arrangements must be established; and
 - f. The details submitted shall include levels, sizing, cross sections and specifications for all drainage features.

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy and Policies 5.12 & 5.13 of the London Plan and the NPPF and to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value.

6. Prior to occupation of the development, a Verification Report demonstrating that the approved drainage / SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include:
 - a. As built drawings of the sustainable drainage systems;
 - b. Level surveys of completed works;
 - c. Photographs of the completed sustainable drainage systems;
 - d. Any relevant certificates from manufacturers/ suppliers of any drainage features;
 - e. A confirmation statement of the above signed by a chartered engineer.

Reason: To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy and Policies 5.12 & 5.13 of the London Plan and the NPPF.

Detailed Drawings

7. Detailed drawings to a scale of 1:20 to confirm the detailed design and materials of the:
 - a. Schedule and sample of materials used in all elevations, should also include brick/cladding sample board (bonding and pointing);
 - b. Details of all windows and doors at scale 1:10, windows shall be set at least 115mm within window reveal scale 1:10;

- c. Construction details of all external elements at 1:20 scale (including sections). This should include: entrances and exits, glazing, masonry, weathering and flashings, balustrades and parapets, roof, plant and plant screening, health and safety systems;
- d. Full drawn details (1:20 scale elevations, 1:2 scale detailing) of the railings and gates (including hinges, fixings, locks, finials).

Shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development above ground hereby permitted. The development shall thereafter be carried out solely in accordance with the approved details.

Reason: To safeguard and enhance the visual amenities of the locality.

Samples and Materials

- 8. Prior to commencement of development above ground, a sample panel and a schedule of materials to be used in all external elevations including walls, doors, windows front entrances and balconies within the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority before any building work commences and this condition shall apply notwithstanding any indications as to these matters which have been given in the application. The development shall thereafter be carried out solely in accordance with the approved details.

Reason: In order to ensure that the building has an acceptable external appearance and preserves the character and appearance of the conservation area.

Surfacing Materials

- 9. Prior to commencement of development above ground, details and design of the surfacing materials to be used within the development including footpaths, shared surfaces, access roads, parking areas, road markings and all other hard surfacing shall be submitted to and approved in writing by the Local Planning Authority. The surfacing shall be carried out in accordance with the approved detail before the development is occupied or use commences.

Reason: To ensure that the development does not prejudice highway safety and a satisfactory appearance.

- 10. Prior to commencement of development above ground, a Landscape and Public Realm Strategy for all external public realm areas within the curtilage of the site hereby approved shall be submitted to and approved by the Local Planning Authority. This Strategy is to include, amongst other things, details of proposed plant and tree maintenance, paving materials, pedestrian priority materials and shared surface treatments, plant species, ground levels, green roofs, boundary treatments and water features. The development shall be in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the proposed landscaping areas are of a high quality and for consistent treatment of the public realm.

Soft Landscaping

- 11. Prior to commencement of development above ground, details of trees, shrubs, grass and all other soft landscaped areas of internal and external amenity spaces to be

planted on the site shall be submitted to and approved in writing by the Local Planning Authority. The planting scheme shall be carried out in accordance with the approved details in the first planting season after completion or occupation of the development whichever is the sooner. Any planting which dies, becomes severely damaged or diseased within five years of planting shall be replaced with new planting in accordance with the approved details.

Reason: To provide a satisfactory appearance and ensure that the development does not prejudice highway safety.

Refuse Stores

12. The development shall not be occupied until details of refuse storage facilities including facilities for the recycling of waste to be provided within the development, in accordance with the London Borough of Enfield Waste and Recycling Planning Storage Guidance ENV 08/162, have been submitted to and approved in writing by the Local Planning Authority. The facilities shall be provided in accordance with the approved details before the development is occupied or use commences.

Reason: In the interests of amenity and the recycling of waste materials in support of the Boroughs waste reduction targets.

Cycle Parking

13. The development shall not be occupied until details of the siting, number and design of secure/covered cycle parking spaces have been submitted to and approved in writing by the Local Planning Authority. The approved details shall thereafter be installed and permanently retained for cycle parking.

Reason: To ensure the provision of cycle parking spaces in line with the Council's adopted standards.

Energy Statement

14. The development shall not commence until a detailed 'Energy Statement' and relevant SAP calculations has been submitted and approved in writing by the Local Planning Authority. Submitted details will demonstrate the energy efficiency of the development and shall provide a significant reduction in total CO₂ emissions arising from the operation of a development and its services over Part L of Building Regs 2010 in line with Council and London Plan Policy. The Energy Statement should outline how the reductions are achieved through the use of Fabric Energy Efficiency performance, energy efficient fittings, and the use of renewable technologies.

The development shall be carried out strictly in accordance with the details so approved and maintained as such thereafter.

Reason: In the interest of sustainable development and to ensure that the Local Planning Authority may be satisfied that CO₂ emission reduction targets are met in accordance with Policy CP20 of the Core Strategy, Policies 5.2, 5.3, 5.7 & 5.9 of the London Plan 2011 and the NPPF.

Energy Performance Certificate

15. Following practical completion of works a final Energy Performance Certificate shall be submitted to an approved in writing by the Local Planning Authority prior to occupation of the development.

Reason: In the interest of sustainable development and to ensure that the Local Planning Authority may be satisfied that CO2 emission reduction targets are met in accordance with Policy CP20 of the Core Strategy, Policies 5.2, 5.3, 5.7 & 5.9 of the London Plan 2011 and the NPPF.

No Pipes

16. No pipes or vents (including gas mains and boiler flues) shall be constructed on the external elevations unless they have first been submitted to the Local Planning Authority and approved in writing. Any pipes and vents shall be installed as approved.

Reason: Such works would detract from the appearance of the building and would be detrimental to the visual amenities of the locality.

Servicing Management Plan

17. Prior to occupation of the development, full details of a servicing management strategy for the management of deliveries and servicing of the development, shall be submitted to and approved by the Local Planning Authority. Servicing shall thereafter be carried out solely in accordance with the approved details.

Reason: In order that the Local Planning Authority and Transport for London may be satisfied as to the effects of the scheme on the adjacent road network so as to avoid hazard or obstruction to the public highways.

Travel Plan

18. A Sustainable Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the use hereby permitted commencing. The measures approved in the Travel Plan shall be implemented prior to the residential use hereby permitted commencing and shall be so maintained for the duration of the use, unless the prior written approval of the Local Planning Authority is obtained to any variation.

Reason: To ensure that the travel arrangements to the residential development are appropriate and to limit the effects of the increase in travel movements.

Wheelchair Adaptable Housing

19. At least 10% of the residential flats hereby permitted shall be designed so that they can be easily adaptable to meet the Wheelchair Housing standard.

Reason: To secure appropriate access for disabled people.

Lifetime Home Standards

20. All the units shall comply with Lifetime Home standards in accordance with details to be submitted to and approved in writing by the Council. The development shall be carried out strictly in accordance with the details approved and shall be maintained thereafter.

Reason : To ensure that the development allows for future adaptability of the home to meet with the needs of future residents over their life time in accordance with Policy CP4 of the Core Strategy and Policy 3.5 of the London Plan 2011.

Crime Prevention Strategy

21. Notwithstanding the details of the development, hereby approved, a detailed crime prevention management and maintenance strategy detailing how the development will minimise opportunities for crime including details of a controlled access system, CCTV and external lighting shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development.

Reason: To ensure that the development protects community safety.

Waste Water

22. Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.