

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 6th November 2018

Report of

Executive Director - Place

Contact Officer:

Andy Higham
Tel No: 0208 379 3848

Ward:

Southgate Green

Application Number: 18/00633/RE4

Category: LBE - Dev by LA

LOCATION: Broomfield Park, Broomfield Lane, London, N13 4HE

PROPOSAL: Creation of a wetlands area (1500sqm) involving increase in height of bund by 0.8m, restoration of water feature together with associated landscaping to the south east corner of the park.

Applicant Name & Address:

Graham Campbell
London Borough of Enfield
B-Block North
Civic Centre
Silver Street
EN1 3XA

Agent Name & Address:

Graham Campbell
London Borough of Enfield
B-Block North
Civic Centre
Silver Street
EN1 3XA

RECOMMENDATION: In accordance with Regulation 4 of the Town and Country Planning General Regulations 1992, planning permission be deemed to be granted subject to conditions.

Note for Members: This application was previously considered by the Planning Committee at its meeting on 25th September 2018. At that meeting, Members resolved to refuse planning permission however, prior to the formal issuing of the decision notice, additional information has been identified and Cllr Anderson has requested the application is reconsidered in the light of this information.

1. Site and Surroundings

- 1.1 The application site is located within Broomfield Park. Broomfield Park is an early C18 formal garden associated with Broomfield House (Grade II*), comprising a walled enclosure focused on a series of early C18 formal, tiered water bodies developed from earlier fishponds, and set within a landscape park. The historic gardens and parkland were converted for use as a public park, from 1908-14. Broomfield Park is included in Historic England's Register of Parks and Gardens of Special Historic Interest at Grade II.
- 1.2 The proposed site location is situated in the south-west of the park, in the western half of the park, which is known as West Field. West Field was historically the parkland associated with the house and gardens but is now an area of urban parkland. The majority of this area is grassed but the north-eastern corner of West Field contains facilities associated with public use including tennis, netball and basketball courts, bowls club, memorial garden and community orchard. The west wall, which runs adjacent to the site, is Grade II listed in its own right
- 1.3 Broomfield House stands towards the south-east of the 21ha site, with the gardens and park lying to the west. The site is on level ground and is set within a largely residential area of Enfield between Arnos Park to the west and Palmer's Green to the north-east. The park is bounded by Alderman's Hill (A1004) to the north, Powys Lane to the west (B1452), Broomfield Avenue beyond a row of houses to the east, and Broomfield Lane bordering the southern edge of the park. The south-east boundary is marked by C16 to C18 brick walls (listed grade II) and there are park railings along the south-west, west and north sides. The main approach to the House is from Broomfield Lane from where a drive leads west to the south side of the House. There are further entrances into the gardens and park from the surrounding roads on all sides.
- 1.4 Broomfield House itself is a house of several periods. Southern part appears to be of C16 and has high pitched hipped roofs in form of a square, now slated. Northern part of early C18, also with hipped roof now slated. Two old compound brick chimney stacks. Roofs largely concealed by parapets. North front of two storeys, four windows. C18 red brick, formerly painted. Cornice band and 1st floor band. 1st floor sash windows with glazing bars in wood lined reveals; ground floor long replaced sashes. All other facades covered in C20 roughcast and mock half-timbering. Western entrance has one-storey recessed porch. Some windows late C18 or early C19 sashes with glazing bars. Inside at the south end some original timber framing, including heavy chamfered beams with joiners' marks, and chamfered joists. Good C18 staircase with 3 different balusters to a tread, carved tread ends and ramped handrail. One fine panelled room with ornamental cornice and chimney piece. Other panelling and enriched doorcases. Some carving possibly imported. Staircase walls and ceiling attributed to Sir J Thornhill, but the attribution seems doubtful; the work is either by a copyist or badly painted over.
- 1.5 The early C18 rectangular stable block stands to the south of the House, currently (1999) empty. The stable court is enclosed by high, early C18 brick walls.

- 1.6 The Site adjoins the Lakes Conservation Area. Broomfield Park was recently added by Historic England to their register of Heritage at Risk due to the cumulative impact of incremental changes. Broomfield House and stables are long standing entries on that Risk Register.
- 1.7 The site is also identified as local open space, Metropolitan open land, registered park or garden and a site of archaeological interest.

2. Proposal

- 2.1 The applicant seeks full planning permission for the creation of a wetlands area (1500sqm) involving increase in height of bund by 0.8m, restoration of water feature together with associated landscaping to the south east corner of the park.

3. Relevant Planning Decisions

- 3.1 None relevant

4. Consultations

4.1 Statutory and non-statutory consultees

4.1.1 Traffic and Transportation

- No objections subject to conditions

4.1.2 Trees

- No objections

4.1.3 Environmental Health

- No objection subject to a condition for Construction Management Plan as the development area is in close proximity to residential premises and dust emissions are potential issues during the construction phase.

4.1.4 SuDS

- No objections. The Broomfield Park Wetlands project will help to reduce surface water flood risk in this area, providing a greater standard of protection against flooding for properties and critical infrastructure. Constructed wetlands form a crucial part of our Local Flood Risk Management Plan. Wetlands are a type of flood management which are capable of storing water during and after storm events, reducing flood risk. In Broomfield Park the inclusion of wetland features will assist in draining nearby water-logged areas of the park. The diversion of a surface water sewer to a wetland environment allows for improvements to the water quality through natural restorative treatment.

4.1.5 Conservation

- The sensitive relationship between the proposed development and the designated heritage interests, and the potential for harm to arise as identified

by Historic England is a material consideration in the assessment of acceptability and must be acknowledged. The proposed development needs to be thoroughly explored with these heritage bodies who have the expertise to advise and enable the careful consideration of these issues. The additional information provided by the Applicant identifies the rationale behind the design / location and the public benefits associated with the development and meetings with Historic England and the London Parks and Garden Society will enable the relationship to the designated heritage assets to be explored in more detail. An update will be provided ahead of the meeting.

4.1.6 Thames Water

- No objections

4.1.7 Historic England

Pre-application advice was provided by Historic England during consultation, including a site meeting on 2nd November 2017, with the Structures & Watercourses Team. The advice confirmed that the Registered Park and Garden has been assessed as 'Vulnerable' for Heritage at Risk (HAR) partly as a result of the incremental changes that have already been made to the landscape and that further interventions could potentially place this heritage asset at greater risk of loss of significance

In response to the application, Historic England expressed concern over the very bad condition of Broomfield House and Stable Block (Grade II *), the condition of a number of other features and the cumulative effect of a succession of incremental changes eroding the character and extent of surviving Parkland: this they cited as seriously impacting on the significance of the Registered Park and Garden. In light of these circumstances, Historic England recently added the Park to the Heritage at Risk Register (the House and Stable Block are long running cases on the at-Risk Register).

Although Historic England acknowledge the proposed wetlands will deliver drainage and associated improvements, they contend the proposed wetlands will result in the permanent physical and visual alteration of part of the surviving Parkland - a feature of the historic designed landscape in its own right.

Parkland forms the essential soft landscape of 'pasture' and planting, often serving as the foil to the more intensive experience of the formal pleasure grounds and ornamental gardens around the main house. Its more open and 'featureless' character of grass, freestanding trees and clumps often make it more fragile than the easily-recognised and better-protected gardens and built landscape features. It is easily lost and can be difficult to reinstate.

Historic England consider the proposed wetlands will occupy the only remaining part of the Parkland outside of the double avenue where open grassland directly adjoins the walled enclosure at the heart of the historic designed landscape. In this area, they will permanently alter the physical and visual character of the smooth sward of grass sweeping uphill from the walled enclosure and represent further loss of open Parkland to incremental features and facilities. This will result in harm to the significance of the Registered Park and Garden.

The planning application has limited information setting out clear and convincing justification for such harm, including options appraisal assessing alternative locations and extents of schemes either within the Registered Park and Garden or outside of it.

Historic England urge their comments to be considered and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice as well as any consultation responses from the Gardens Trust / London Parks and Gardens Trust.

4.1.8 London Park and Garden Trust - Objection

The Trust object to the proposals stating that “Not only is the Park Grade II listed but is the setting of several grade II* historic features including Broomfield House; the remains of C16-18th east wall with attached early C18th pavilion/garden house & stable block.

The Trust remain unconvinced with the claim in the applicant’s heritage statement that “The public benefit of the flood alleviation scheme to reduce flood risk ... is considered to outweigh the minimal harm caused to the Heritage Asset.” (*Heritage Statement* 4.1.7.). Broomfield House and its Stable Block are already on the HAR register for London, and any further erosion to their fragile setting can only have a negative impact upon their significance. The London Park and Garden Trust would prefer to see the funding from Thames 21 and the Mayor of London being put to use for a SUDs scheme in a less sensitive site, or with a scheme that involves proper consideration of the heritage sensitivities of this site. They therefore object on the basis of the following reasons:

- It is not apparent from the documentation why Broomfield Park was chosen as the site for this SUDs scheme. There is nothing to indicate whether other less sensitive sites were considered, even if they were eventually deemed unsuitable, and if so for what reason(s); and
- The two proposed SUDs wetland cells and their decking bridge sit uneasily in relation to the historic walls (Visualisation Fig 3, *Planning Statement*, p5) and the formal lime avenue, and are alien in character and appearance to the smooth ‘parkland’ grass which currently borders these features.

The Heritage Statement 3.6.16 stresses the “relationship between the House, formal gate and parkland form the setting of Broomfield House. The setting makes a high contribution to the importance of Broomfield House.” Introduction of wetland cells with their associated informal bog/damp planting/landscaping would considerably alter this key historic setting, and therefore would have a correspondingly negative effect upon the significance of the RPG.

They disagree with Para 4.1.6 in the *Heritage Statement* which states that “it is considered that there will be no impact upon the setting of the surrounding heritage assets, including Broomfield House (Grade II*), walls associated with Broomfield House/Park Grade II) ...” The undoubted harm caused to the Grade II RPG (see NPPF Para 132) is not given any clear and convincing justification within the application documents. The London Park and Garden Trust remain unconvinced that “The public benefit of the flood alleviation

scheme to reduce flood risk ... is considered to outweigh the minimal harm caused to the Heritage Asset." (*Heritage Statement 4.1.7.*).

The London Park and Garden Trust are unclear as to the level of flood alleviation/water storage required. They would have liked clarification of the capacity of the existing lakes and stemming from this, a SUDs scheme designed proportionately so that the RPG and its constituent fabric/features are not harmed (NPPF Para 132 - great weight should be given to the conservation of irreplaceable heritage assets). The impression given by the available documentation is that this scheme is SUDs-driven rather than considering the overall benefits, which include public amenity value.

The London Parks and Garden Trust also have concerns relating to the ongoing management of the area and the provision of funding for the future maintenance of the decking/bridge. We can see this potentially falling into disrepair in a short timescale. Since the Friends of Broomfield Park already undertake much of the maintenance of the Park and do not have capacity to take on more responsibility for core maintenance tasks we would like assurance that Enfield has sufficient budget for the increased maintenance this potential new feature will entail.

4.1.9 Conservation Advisory Group - Objection

The Group considered the application in light of the concerns expressed by Historic England and the London Parks and Garden Trust and supported their objections to the planning application.

4.2 Public

4.2.1 Consultation letters were sent to 387 adjoining and nearby residents. Notice was also published in the local press and displayed at the site. Two responses have been received.

4.2.2 The Chair of the Broomfield House Trust commented as follows:

Concerns that the area marked for a temporary work site overlaps with an area noted in the Heritage Statement. Plan 5, where crop marks are shown based on Google earth imagery. This has not been investigated. Although Lidar imagery does not show anything, neither does it show anything on the back lawn where excavations have revealed archaeological remains. Investigation in situ in this area should ideally be carried out to settle the matter. This is on an area of level raised ground, which does not follow the general fall of the grassland area and is bounded to the south by signs of embankment. Investigations of the history of the house and park have considerable gaps in the written record or in maps before the OS began its work. Would it not be wise to look in to this (by excavation?) before covering it with a works compound?

Appendix 5 of the Environmental Statement indicates a large area (1 hectare) over the same general area would be raised by 50cm, however this doesn't appear to be explained or referred to elsewhere.

4.2.3 The Co-chair of the Friends of Broomfield Park supports the development:

I am writing on behalf of the Friends of Broomfield Park in support of the proposed wetland scheme presented by Thames 21 in conjunction with Graham Campbell of Enfield Council. We have been involved in consultation over the last year or so with an initial presentation to the Open Meeting of the Friends in May 2017. There were subsequent consultation events in the park during the summer months where Graham Campbell, Thames 21 and a sub-group of the Friends committee gave out information to the public about the Wetlands proposal and encouraged visitors to complete a survey form giving their views. The Friends Committee met last on Wednesday 18 July and confirmed our unanimous support for the scheme.

We have seen the letter from Christopher Laine, Historic England' landscape architect, in response to the planning application which expresses concerns about the proposed wetland. We think these concerns are essentially unfounded, for the following reasons:

- Broomfield Park, especially the west field, and the closely adjoining Broomfield Farm (it was the other side of Powys Lane from the lowest lake), have historically been wetland. Evidence of this is the letter from the tenant of Broomfield Farm (Dugdale archive document D256), written in the 1890s, complaining about the poor state of drainage at the farm.
- More graphically, the 1867 25-inch ordnance survey map (attached, and available at The Dugdale) shows there were substantial bodies of water around the west and south sides of Powys Lane, with a large pond at the triangle. The historically soggy ground of the west field is probably the reason that it was apparently never cultivated for crops. It's also worth noting that English Elms - used to make the original Broomfield avenues, are known to tolerate water logging.
- The proposed wetland is very close to the former Powys Lane stream and pond and is thus in harmony with the historic (pre-extensive drainage) features of the west field. It will, as acknowledged (and in line with Enfield's policies), greatly enhance the biodiversity of much of the "green desert" grassland - no longer a flower-rich meadow when it was managed by grazing, but species-poor, and heavily mowed.
- Regarding visual impact, the proposed wetland will have no trees, and will mostly be concealed from view from the (restored!) house by the wall. So the impact should be minimal, and certainly less than the impact of the tennis courts, which Enfield's own Conservation Management Plan suggests should be moved to the eastern sports field.
- It is, of course, a question, as to which historic period of a landscape we wish to preserve. But we consider that the proposed wetland would sit well in landscapes of the nineteenth century or earlier - which HE wants to conserve and bring more of the natural world back to the park.
- The Friends support the development of new habitats for wildlife and biodiversity within the Park and have been very involved with projects such as the Community orchard with apiary, wildlife-pond, wild flower gardens and planting of hedgerow (in association with the Woodland Trust). The Friends have successfully reintroduced several spectacular banana plants in the Conservatory along with a new range of subtropical food plants such as coffee bean, tea, ginger, chilli peppers and tomatoes.

The Sensory Garden, which was originally built in 1959, as a 'scented garden for the blind' was replanted by the Friends on the Garden's 50th anniversary with a variety of herbs and strongly scented plants such as lemon balm, curry and buddleia. We have supported the council's policy to leave parts of the park unmowed for parts of the year as meadow and reinstate the avenue of lime trees (previously elm).

- We welcome the access to nature that this may provide to for our younger community, we already host regular visits from local schools, the Duke of Edinburgh scheme and a group of younger adults with learning disability from our local Mencap centre among others. This seems to be very much in line with initiatives such as Green Capital Grants scheme, the National Park City initiative and Chris Packham's recent appeal in the Evening Standard for wildlife spaces and flowers in our city parks.
- The potential environmental link with other highly successful local wetland developments such as Firs Farm, Groveland's Park, Woodberry Wetlands and Wathamstow Wetlands is very exciting, and we have seen how habitats can be quickly populated by wildlife just in their creation.

4.2.4 In addition, comments have been received from the Ward Councillor and a further Councillor, in support of the proposal.

4.2.5 Cllr Daniel Anderson comments that "As ward councillor for Southgate Green, as well as being the former Cabinet Member for Environment where I spearheaded a number of similar wetland projects across the Borough, I'd like to make clear my full support for the proposed Wetland Project in Broomfield Park and would like my wishes conveyed to the Planning Committee.

One of the key aims of the Council's Local Flood Risk Management Strategy is to create wetlands, rain-gardens (i.e., mini-wetlands that capture rainfall runoff from hard surfaces) and other types of sustainable drainage features (SuDS) to slow the flow of water during storms and therefore reduce flood risk.

I'm pleased to say that having delivered a number of major projects over the last 4 years, namely Glenbrook, Grovelands Park, Pymmes Park, Firs Farm, Bury Lodge and more recently the Prince of Wales Open Space Wetlands in Enfield Lock, Enfield is now recognised as a leading authority in sustainable drainage schemes.

Indeed, we have also just been awarded a significant share of grant funding from the Mayor of London for a new wetland at Albany Park, which is an opportunity to naturalise approximately 400m of Turkey Brook making the park safer (by removing a 3.5m high concrete wall) and create a habitat rich landscape feature.

We've completed SuDS rain-garden projects at Houndsden Road, Alma Road, Bramley Road, Bulwer Road and on Green Lanes, as part of the Cycle Enfield works and in Southgate Green residents have also benefited from rain-gardens at the lower end of Waterfall Road by Arnos Park and at Betstyle Circus Roundabout, both of which are aimed at reducing specific flood problems.

As well as creating wildlife habitats and attractive landscapes within our parks and open spaces these projects have reduced flood risk to hundreds of our residents - i.e., the £15m Environmental Agency funded Salmons Brook flood alleviation project now protects over 2,500 homes. They have helped to bring Enfield's rivers back to life by reducing pollution and raised awareness about the environment.

Such is our success that we have received both national and international acclaim for the scale and our commitment to these ventures. Indeed, only last week partners from across Europe visited Enfield to learn from our good practice.

Furthermore, the Thames Regional Flood & Coastal Committee, on which I represent the London North region, has chosen Enfield to lead on their London Strategic SuDS Pilot that aims to address issues with the funding and deliverability of SuDS. Key aims are to assess the flood risk management benefits of large numbers of small SuDS measures, evaluate the non-flood benefits and make it easier to integrate SuDS measures into non-flood related schemes.

The proposed Broomfield Park Wetlands, developed in conjunction with environmental charity Thames21, will significantly reduce flood risk both locally and in areas downstream such as Edmonton. It will further reduce pollution in Enfield's rivers, as well create an enhanced landscape for residents. It will provide wildlife with a diverse range of habitats and interesting features. It will also create more opportunities for people young and old alike and of all abilities to experience close at hand natural habitats and provide direct educational opportunities.

I note the concerns from Historic England and the objections from the Council's Conservation Officer, Conservation Advisory Committee and the London Park and Garden Trust but think them misplaced. This is an excellent initiative, which will enhance, not diminish, the look and feel of the park as well as help protect properties in the vicinity from the risk of flooding. Evidence from other similar schemes as stated above has demonstrated this effect. I would therefore ask that the Committee to support the proposal as recommended by Planning Officers.

4.2.6 In addition, Cllr Dinah Barry has also commented that

- The existing wetlands in other parks have been of great benefit;
- Made the area more interesting and attractive;
- Increased biodiversity;
- Attracted more visitors;
- Provided wonderful opportunities for children to play and learn; and
- Been valued by schools for the opportunities they present to deliver the curriculum.

All this in addition to flood relief for local homes.

4.3 Applicant Response

4.3.1 Since the planning committee meeting on the 25th September 2018, the applicant has submitted a detailed response to address the concerns raised

in relation to this proposal. This will be explored within the body of the report with responses provided to the key issues raised.

5 Relevant Policy

5.1 The Development Management Document (DMD) policies have been prepared under the NPPF regime to be NPPF compliant. The DMD provides detailed criteria and standard based policies by which planning applications will be determined.

5.2 The policies listed below are considered to be consistent with the NPPF and therefore it is considered that due weight should be given to them in assessing the development the subject of this application.

5.3 London Plan

- 2.2 London and the wider Metropolitan area
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.14 Water quality and wastewater infrastructure
- 7.4 Local character
- 7.5 Public realm
- 7.8 Heritage assets and archaeology
- 7.18 Protecting local open space and addressing local deficiency

5.4 Core Strategy

- CP21 Delivering sustainable water supply, drainage and sewerage infrastructure
- CP28 Managing flood risk through development
- CP29 Flood management infrastructure
- CP30 Maintaining and improving the quality of the built and open environment
- CP31 Built and landscape heritage
- CP34 Parks, playing fields and other open spaces

5.5 Development Management Document

- DMD 37 Achieving High Quality and Design-Led Development
- DMD44 Conserving and Enhancing Heritage Assets
- DMD45 Parking Standards and Layout
- DMD59 Avoiding and Reducing Flood Risk
- DMD60 Assessing Flood Risk
- DMD61 Managing Surface Water
- DMD62 Flood Control and Mitigation Measures
- DMD63 Protection and Improvement of Watercourses and Flood Defences
- DMD71 Protection and Enhancement of Open Spaces
- DMD72 Open Space Provision
- DMD78 Nature Conservation
- DMD79 Ecological Enhancements
- DMD81 Landscaping
- DMD84 Areas of Special Character

5.6 Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 9, refer to setting. Section 66(1) states: 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

5.7 Registered Parks and Gardens

The addition of parks and gardens to the Register means that they are subject to a statutory designation, and have the same weight in policy terms under the National Planning Policy Framework (NPPF) as scheduled monuments and listed buildings. In NPPF terms, they are 'designated heritage assets'. Registration is a 'material consideration' in the planning process, meaning that planning authorities must consider the impact of any proposed development on the landscapes' special character.

5.8 Other relevant policy/guidance

National Planning Policy Framework
National Planning Practice Guidance
The Ancient Monuments and Archaeological Areas Act 1979
Broomfield House, Conservation Management Plan - June 2016

6 Analysis

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

- Principle of the Development
- Drainage
- Impact on heritage assets

Principle of Development

6.2 Policy CP34 of the Core Strategy and DMD71 of the Development Management Document refer to the protection of parks, playing fields and open spaces. Policies DMD78 and DMD79 of the Development Management Document and CP36 of the Core Strategy refer to nature conservation, ecology and biodiversity. Additionally, policies CP12 of the Core Strategy and DMD31 of the Development Management Document refer to visitors and tourism. Finally, policies DMD60 and DMD61 of the Development Management Document and policy CP28 of the Core Strategy refer to flood risk and managing surface waters.

6.3 Enfield's waterways are a valuable asset for the borough; they provide water resources for London, opportunities for sport, recreation and leisure, access to nature, a historical reference, and an attractive setting. However, they also represent sources of fluvial flood risk in Enfield, posing a potential threat to life and property which needs to be pro-actively managed. The underlying pattern of geology and the effects of urbanisation mean that the borough is also susceptible to incidents of surface water and groundwater flooding.

- 6.4 Enfield's Strategic Flood Risk Assessment (SFRA) Level 1 (2008) and Surface Water Management Plan (SWMP) (2012) provide local evidence of all forms of flooding including fluvial, surface water, groundwater, sewers and reservoirs. Policy DMD60 states that site specific Flood Risk Assessments (FRA) must accompany all applications for:
- a. Development proposals of 1 hectare or greater in Flood Zone 1;
 - b. All proposals for new development located in Flood Zones 2 and 3; and
 - c. All proposals in groundwater flood risk areas that involve the creation of useable space below ground;
 - d. All proposals for new development identified as being at risk from surface water flooding in the SWMP; or,
 - e. Any development that may be subject to other sources of flooding identified in subsequent reviews/updates of the evidence base on flooding.
- 6.5 Policies DMD59 through to 63 of the Development Management Document expressly relate to issues of fluvial, surface water and ground water flood risk. In addressing the requirements of the NPPF and the NPPG that seek flood risk management opportunities, and to reduce the causes and impacts of flooding through the Local Plan, this suite of Policies seeks to ensure that development must avoid and reduce the risk of flooding, and not increase the risks elsewhere. Through the application of measures to assess flood risk, control and mitigate flood water and provide enhanced Sustainable Drainage Strategies to demonstrate how proposed measures manage surface water as close to its source as possible in accordance with the drainage hierarchy in the London Plan, the Policies seek to front load flooding considerations in all development proposals. The existence of these policies highlights the importance of addressing flood risk across the Borough
- 6.6 The Flood Water and Management Act 2010 (FWMA) established Unitary Authorities in England and Wales as Lead Local Flood Authorities (LLFAs) with the express mandate to improve flood risk management and ensure the security of water supplies. The FWMA imparted significant new roles and responsibilities on local authorities who now have responsibilities for managing local flood risk. The FWMA also imposed a requirement on LLFAs to develop, maintain, apply and monitor a strategy for local flood risk management in its area that:
- specifies the roles of the different authorities that have responsibilities for managing flood risk;
 - describes how the LLFA is working with partners to reduce flood risk;
 - provides an overall assessment of local flood risk;
 - sets out the objectives for managing local flood risk; and
 - outlines what actions are to be taken to meet those objectives.
- 6.7 The London Borough of Enfield is the LLFA for the area with responsibilities relating to local flood risk from surface water runoff, groundwater and small rivers, streams and ditches. Flooding from main rivers remains the responsibility of the Environment Agency. The proposals seek to deliver the following benefits to the area:

- Improved surface water quality via replenishment through the creation of wetland treatment cells (the surface water drainage network for this area flows towards Pymmes Brook further downstream);
 - Increased biodiversity by creating habitat for a variety of wildlife;
 - New amenity feature in the park; and
 - Reduce flood risk through the storage of water following extreme rainfall.
- 6.8 The proposed wetland project would therefore help to reduce surface water flood risk in this area, providing a greater standard of protection against flooding for properties and critical infrastructure. Constructed wetlands form a crucial part of the Local Flood Risk Management Plan. Wetlands are a type of flood management which are capable of storing water during and after storm events, thus reducing flood risk. In Broomfield Park, the inclusion of wetland features would assist in draining nearby water-logged areas of the park. The diversion of a surface water sewer to a wetland environment allows for improvements to the water quality through natural restorative treatment.
- 6.9 It is therefore concluded that the proposal would provide flood storage mitigation for extreme weather events and therefore has clearly defined benefits in terms of local flooding and pro-actively seeks to address the impact of flooding and climate change to the benefit of residents, environmental quality and the wider area, as well as providing a new amenity feature and increased biodiversity to Broomfield Park, having regard to policies DMD59, DMD60, DMD61, DMD62, DMD63, DMD71, DMD78 and DMD79 of the Development Management Document, CP29, CP34 and CP36 of the Core Strategy and 5.12, 5.13, 7.18 and 7.19 of the London Plan as well as the guidance contained within the NPPF.

Impact on Heritage Assets

- 6.10 The potential impact on heritage assets must be considered in relation to the NPPF:

Para 132. State: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. 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, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

Para 133. Goes on to say: "Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss..."

- 6.11 We therefore firstly consider the significance of the asset, in this case, the relationship between the House, formal gardens and parkland form, to the

historic setting of Broomfield House. The current condition of Broomfield House is noted but the heritage value of these assets is inextricably linked and this is recognised by their designation and inclusion on the relevant “at risk registers”. The surviving historical features within the setting of Broomfield House, including the Grade II Listed garden walls, formal gardens, lime avenue etc, have great aesthetic and historic value and inform the historical context and our understanding of the site as whole.

- 6.12 Overall, the setting, particularly the juxtaposition of the openness of the parkland set against the formal gardens is considered to make a significant contribution to the importance of Broomfield House and Park. This is also acknowledged in the submitted Heritage Statement; as such officers consider that the proposed site does have a substantial significance to the List Park and Bromfield House.
- 6.13 The next element of the assessment is to determine the level of potential harm on the registered Broomfield Park and Grade II listed Broomfield House, if any. The proposed wetlands (covering an area of 0.35ha, up to 2 metres depth with banks between 1:4 and 1:8 gradients) will occupy the only remaining part of the Parkland outside of the double avenue where open grassland directly adjoins the walled enclosure at the heart of the historic designed landscape. In this area, they will permanently alter the physical and visual character of the smooth sward of grass sweeping uphill from the walled enclosure and represent further loss of open Parkland to incremental features and facilities. Historic England considers that this will result in harm to the significance of the Registered Park and Garden. However, it must also be noted that the Friends of Broomfield Park have identified that the Park historically contained areas of wetland and thus, it is considered the reintroduction would not present a historically alien feature.
- 6.14 Historic England consider that the proposed SUDS wetland cells and their decking bridge sit uneasily in relation to the historic and the formal lime avenue and are alien in character and appearance to the smooth ‘parkland’ grass which currently borders these features. Officers consider that the relevance of this smooth grassed area to the listed elements is less significant, when considered against the other wetland schemes the Council has undertaken and the historic association as a wetland area identified by the Friends of Broomfield Park. These have shown that the impact can be more minor in nature and as such consider the potential level of harm to be less than significant, given its location away from the heritage assets, detached from the main listed buildings.
- 6.15 NPPF Para 134 states: *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”*
- 6.16 Harm can therefore be outweighed by identifying wider public benefit; however, officers should firstly try to reduce the harm itself before weighting up any potential benefits. In this case as mentioned above, the applicants given considered to the location within the park while reducing the harm was not considered, it is clear that there are substantial justification for the proposed location.

- 6.17 The proposed works would be constructed to the south west section of the park adjacent to Powys Lane and therefore are a distance away and separated by a walled enclosure, Broomfield House and the ornamental feature ponds. The proposed works would include several bunds to a maximum height of approximately 0.8 metres in height as well as landscaping and excavation works to provide a wetland habitat of approximately 1500 sq.m. While this would be raised, due to the location within the Park it is not considered to interfere with the listed elements, nor would it be raised in height to such a degree that it would compete with the listed elements.
- 6.18 It is therefore considered that the proposed level of works and separation from the significant parts of the park, would not compromise the Grade II listed building and its setting, or cause visual harm to the significance of the existing water features and registered gardens, having regard to policies CP31 of the Core Strategy, DMD44 of the Development Management Document and 7.8 of the London Plan. Due to the location of the site at a distance from the elements of the Park with most significance, the proposal would have less than substantial harm on the heritage assets.
- 6.19 With this application, officers consider that with less than substantial harm to the heritage assets and the positive public benefits of surface water drainage mitigation of the proposed development, the harm would be outweighed by public benefits.

Broomfield Park SuDS Scheme Justification

- 6.20 The proposed wetlands at Broomfield Park are a type of Sustainable Drainage Systems (SuDS). All well designed SuDS aim to deliver a wide range of benefits including:
- Reduced flooding - providing surface water storage in an urbanised catchment reduces flood risk to downstream properties;
 - Water quality - SuDS are designed to cleanse and filter water in a natural way thereby protecting watercourses, as opposed to traditional piped drainage which drain flows to receiving rivers as directly as possible;
 - Air quality - the associated provision of enhanced planting can serve to reduce air pollution with direct health implications;
 - Amenity and recreation - features seek to increase attractiveness and desirability of areas and increase the scope of specific recreational activities;
 - Biodiversity and ecology - the introduction of new native species increase the mosaic of different habitats;
 - Education - the wetlands provide opportunities for local school children and other residents to get closer to nature and learn about the environment; and
 - Health - by providing recreational and aesthetic improvements facilities can provide the opportunity for physical, emotional and mental health treatment to nearby populations
- 6.21 Whilst the primary aims of the proposed wetlands are to address flood risk and poor water quality in the Pymmes Brook catchment these opportunities for additional benefits are considered carefully through all stages of design, construction and aftercare.

- 6.22 The current Environment Agency fluvial flood mapping for this catchment estimates that there are 36 properties with a 'significant' risk of flooding (annual probability between 1 in 20 and 1 in 75) and 267 properties with a 'moderate' risk of flooding (annual probability between 1 in 75 and 1 in 200). There are also a small number of properties near the park (less than 10) that would be affected by surface water flooding with an annual probability of 1 in 30. Figure 1 below shows the extent of flooding in the catchment.

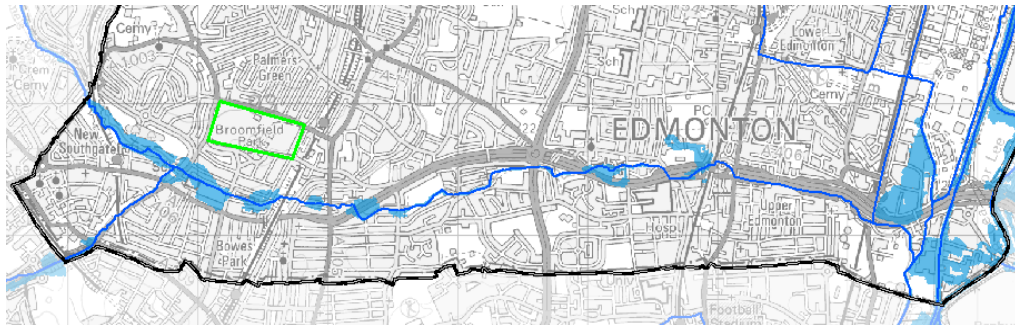


Figure 1 Fluvial flood risk (blue) in the Pymmes Brook catchment for a 1 in 100 year event with climate change (estimated number of properties at risk = 421), Broomfield Park is highlighted in green, Pymmes Brook flows east towards the River Lee

- 6.23 In recent years both the Environment Agency and Enfield Council have investigated options to address flood risk in this catchment using traditional large-scale flood defences; however, due to the highly urbanised nature of the catchment, it has not been possible to identify a viable solution using this approach to flood risk management. Enfield Council's Local Flood Risk Management Strategy (2016) identifies that the most effective way of reducing flood risk is to reduce rainfall runoff by storing water in open spaces upstream of flood risk areas.
- 6.24 The proposed wetlands at Broomfield Park are part of a strategically located series of measures across the Borough that aims to reduce the rate of rainfall runoff entering Pymmes Brook. It is the cumulative impact of these measures that is required within this catchment to have a substantial impact on flood risk downstream.
- 6.25 The topography of the catchment leads to an overland flow route through Broomfield Park that would occur for extreme rainfall events when the capacity of the local drainage system is overwhelmed (see Figure 2 below). There is also a large surface water pipe that runs through park. Diverting both the pipe and the overland flow into the wetlands will slow the flow of water and reduce river flows downstream.
- 6.26 Consequently, Broomfield Park is the ideal place to create a flood storage feature, such as a wetland area, within this catchment - it is upstream of the areas with the greatest risk of flooding, and the local topography and drainage network enable the capture and attenuation of large volumes of water during flood events. Alternative sites it is considered would not deliver the same range of benefits.

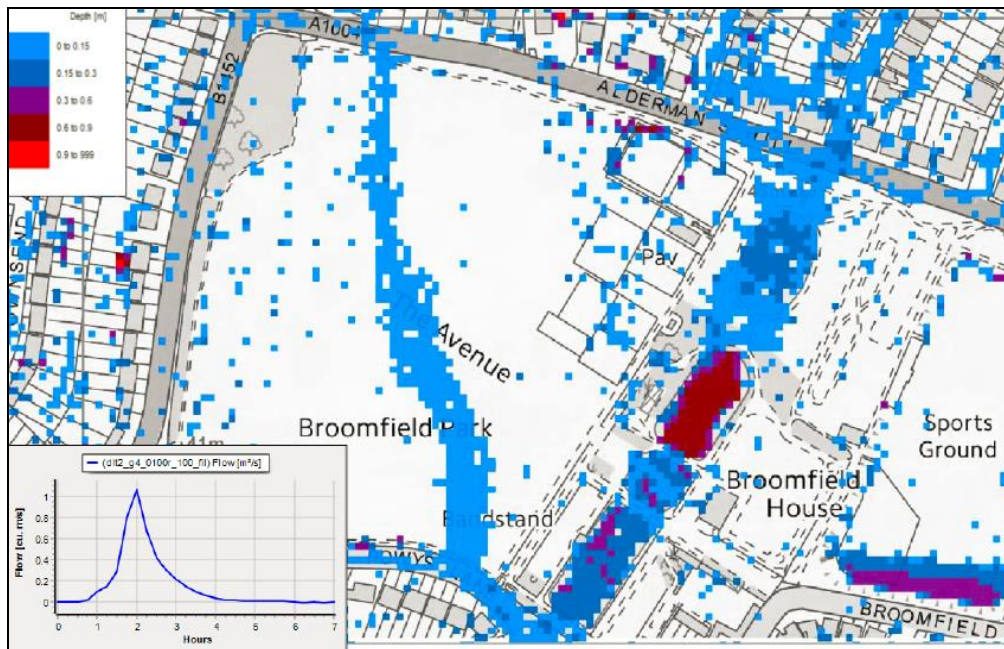


Figure 2 Overland surface water flow route through Broomfield Park for 1 in 100-year event resulting in peak flow of 1m³ / sec at proposed wetland location

- 6.27 The option of utilising wetland features has been selected partly because the excavation required increases the space for storing water and therefore improves the flood risk benefits; however, wetlands also provide significant additional benefits including:
- Water quality - diffuse urban pollution from sources such as roads and residential properties is the main cause of poor water quality in Pymmes Brook, using wetlands to treat surface water flows before being discharged to the river is a proven, effective means of mitigating this widespread problem;
 - Biodiversity - the new features provide a habitat for a wide range of wildlife including birds, bees and amphibians; and
 - Amenity - the wetlands provide an interesting focal point to this area of the park with potential for educational and social uses in the future, by improving the drainage of this area the project creates a more useable space that can be enjoyed by a wide range of park users.
- 6.28 Several other sites within the Pymmes Brook catchment have been identified as possible locations for flood storage areas. Broomfield Park has been determined to have the most potential to deliver flood risk and other benefits for the reasons described above. This scheme is required in combination with other smaller schemes to ensure that Enfield's residents and businesses are protected from flooding from all but the most extreme events.
- 6.29 The applicant has addressed the points raised by Historic England and the Park and Garden Trust in turn below:
- 6.30 a) The two proposed SuDS wetland cells and their decking bridge sit uneasily in relation to the historic walls and the formal lime avenue, and are alien in character and appearance to the smooth parkland grass which currently borders these features
- b) Introduction of wetland cells and their associated informal bog/damp

planting/landscaping would considerably alter this key historic setting

- 6.32 The previous use of this specific area of the parkland is uncertain in itself the Conservation Management Plan (CMP) (2016) for the park suggests that there was a historically existing waterbody in this area of the larger unimproved grassland. It is also suggested that this was a formalisation of a previously natural watercourse which existed here, it is theorised in the CMP that following this formalisation it was at a later date removed (reference CMP pg100). This theory tallies with the existence of the overland flow routes of surface water through this part of the park which bisects the west field and around the lakes. The fact that a culverted drain runs through this exact locality which drains a 34ha catchment is further evidence of a historic watercourse.
- 6.33 The location of the proposed constructed wetlands is very close to these previously removed waterbodies. The CMP included appendix 8 "Landscape Options", within this there is a recommendation for the wider parkland:
- "58: Reinstatement original drainage ditch along the southern boundary and create wet hollows in vicinity to address water logging of the parkland. Allow to develop as ecological habitat, natural SuDS" (reference CMP Appendix 8)

It has previously been shown that the first part of this recommendation which focusses on southern boundary is not feasible due to the levels and the density of mature trees. However, it is felt that the proposals submitted satisfy the remainder of this recommendation.



Figure 3 Plan for landscape option in parkland including recommendation 58 from CMP with proposed approximate wetland extent superimposed over the top in transparent blue

- 6.34 There has previously been discussion about the historical significance of any drainage asset at this location which we feel highlights the lack of understanding of the function of the pond that existed at this location, the CMP states that "its location across the West Wall, extending into both the garden and the parkland is interesting" (reference CMP pg100).

The aim of the project is to deliver a water feature in this location which addresses present day urban drainage issues, as well as respecting the

previous presence of the little understood feature that once existed here, whilst at the same time providing additional multiple benefits to the context of the parkland and wider park as discussed above.

- 6.35 The aim of the wetland project is to deliver a scheme which provides a functional solution to a range of urban drainage issues. It is designed to occupy a relatively small corner of the West Field extremely close to the waterbodies discussed in the sections of the CMP. A further aim of the project is to provide discrete interpretation features to increase understanding of the urban drainage issues and wetlands as well as historical and archaeological points of interest such as the blocked culvert in the west wall.
- 6.36 Once the scheme is constructed and planted to the designed depth the appearance in relation to smooth parkland will be relatively seamless due to the levels and height of the wetland vegetation.
- 6.37 The presence of the decking can be altered or removed as it is not essential to the scheme.
- 6.38 The planning application seeks to introduce a wetland habitat in the south-east corner of the West Field. This area is 9.6Ha of unimproved grassland / parkland habitat. The total area of the wetland scheme covers 0.4Ha of this area which is approximately 4% of the total area of the West Field. The benefits accrued from this small amount of land use change are considered justified.
- 6.39 c) The GT / LPGT remain unconvinced that 'The public benefit of the flood alleviation scheme to reduce flood risk is considered to outweigh the minimal harm caused to the Heritage Asset'
- d) The GT / LPGT are unclear as to the level of flood alleviation / water storage required. We would have liked clarification of the capacity of the existing lakes and stemming from this, a SuDS scheme designed proportionately
- 6.40 Broomfield Park and the surface water sewers which flow through it sit within the Pymmes Brook catchment. This catchment is characterised as a highly urbanised catchment with a large proportion of impermeable areas generating runoff and hence a rapid or 'flashy' response to rainfall. A measure to manage this risk here was highlighted in the Local Flood Risk Management Strategy (2016) as an opportunity to store flood waters during extreme events and a space to apply natural flood management techniques. The deployment of wetlands and potentially other SuDS or NFM measures in the urban areas of the catchment has the potential to complement and extend the benefits of traditional engineering approaches
- 6.41 It is proposed to explore the benefits of measures such as wetlands in the Pymmes Brook catchment because, although there is significant flood risk to both residential and commercial properties, it has not been possible to identify a viable solution using more traditional flood defences. The current fluvial flood mapping for this catchment identifies 36 properties in the 'significant' flood risk band (1:20 to 1:75) and 267 in the 'moderate' flood risk band (1:75 to 1:200).

- 6.42 The existing lakes are not suitable for achieving flood storage capabilities without extensive freeboard heightening. Using the lakes to provide substantive water quality improvements would require significant loss of open water.
- 6.43 Following public consultation for the wetland scheme in Summer 2017 the lakes were incorporated into the proposals for the wetland. This involved directing some existing flows to the lakes and re-connecting them to the existing drainage system and providing a small amount of treatment within the lakes applying appropriate sensitivity to their historic significance. This work was carried out under funding from the Greater London Authority (GLA) with support and voluntary assistance from the Friends of Broomfield Park.
- 6.44 e) The impression given by the available documentation is that the scheme is SuDS driven rather than considering the overall benefits which include public amenity value
- 6.45 The previously mentioned benefits of the scheme which include flooding and water quality improvements are accompanied by other benefits which this scheme and all well designed SuDS measures seek to deliver.
- 6.46 Further benefits with reference to those discussed above include the creation of areas within the subtle landscape of the small discrete wetland for amenity space and varying levels for interaction with the project, the opportunity for the community café to have a new attraction to the park, improved biodiversity in the park by creating new habitats which, as well as providing value themselves, also give enjoyment to people, improved public perception and understanding of sustainable drainage and river pollution issues and potential air quality improvements, and opportunities for education for schools and children's groups.
- 6.47 Similar wetland schemes introduced in recent years in park spaces in Enfield can demonstrate these benefits, chief among them being Firs Farm wetlands which has served as a catalyst for the growth of community friends groups and a resource for education for local schools and children's groups, as well as providing the backdrop for interaction with other local charities and businesses.
- 6.48 f) The GT / LPGT also have concerns relating to the ongoing management of the area and the provision of funding for the future maintenance
- 6.49 An assessment of the maintenance regime shows that the implications are on a par with the current maintenance of open grassland. There will be opportunities for the local community and project partners to provide additional maintenance, above and beyond the basic requirements, where it is agreed that this can enhance the scheme and park in general.
- 6.50 g) The Friends of Broomfield Park already undertake much of the maintenance of the park and do not have capacity to take on more responsibility for core maintenance tasks
- 6.51 This comment was made without consultation by the Gardens Trust with the Friends group and does not accurately reflect their views or capacity.

- 6.52 The Friends actively support the scheme for the wetlands and have written the following in relation to this comment:

“We would also like an opportunity to address the Planning Committee at the meeting in relation to the statement made by The Gardens Trust that the Friends do not have the capacity to help maintain the proposed wetlands. This comment was made by them without discussion with the Friends of Broomfield Park.” (Reference Letter from Co-chairs of the Friends of Broomfield Park to CEO Enfield Council dated 10/10/2018)

- 6.53 An earlier letter from the Co-chairs of Broomfield Park to the case officer for the planning application (dated 24th July 2018) confirms the Friends’ strong support for the project:

“I am writing on behalf of the Friends of Broomfield Park in support of the proposed wetland scheme presented by Thames 21 in conjunction with Graham Campbell of Enfield Council. We have been involved in consultation over the last year or so with an initial presentation to the Open Meeting of the Friends in May 2017. There were subsequent consultation events in the park during the summer months where Graham Campbell, Thames 21 and a sub-group of the Friends committee gave out information to the public about the Wetlands proposal and encouraged visitors to complete a survey form giving their views. The Friends Committee met last on Wednesday 18 July and confirmed our unanimous support for the scheme.”



Figure 4 - Proposed view point - western aspect. As included in planning statement

Impact on Neighbouring Occupiers

- 6.54 The proposed works are well embedded within the site and whilst part of the works seek to create a bund to increase ground levels by approximately 1m, it is not considered that such works would have any detrimental impacts on neighbouring amenities in regards to loss of sunlight/daylight or outlook or privacy due to the distance of the proposal to the closest residential properties, having regard to policies DMD6, DMD8 and DMD10 of the Development Management Document.
- 6.55 However, Environmental Health have requested that an appropriate condition should be attached for a Construction Management Plan to mitigate dust

emissions during the construction phase, having regard to policies DMD68 of the Development Management Document, CP31 of the Core Strategy and 7.15 of the London Plan.

Traffic and Transportation

- 6.56 The proposals would have no impacts on the surrounding highway network, access, servicing or parking facilities at the site.
- 6.57 The existing open space at Broomfield Park provides a valuable community facility and route to residential areas Powys Lane, Broomfield Lane, Aldermans Hill and beyond. The proposed works would not result in the diversion or stopping up of any public rights of way and thus is considered acceptable in regard to pedestrian access.
- 6.58 With regards to construction traffic, an appropriate condition could be attached to secure a Construction Logistics/Management Plan and restricted construction hours and therefore it is not considered that the proposed works would have any adverse impacts upon residential amenities or conditions prejudicial to the safety and free flow of traffic.

Archaeology

- 6.59 Over the years, modification of the landscape has taken place. The possibility exists that it represents an area which was part of the formal gardens of the house, or for example a kitchen garden or other enclosed space ancillary to the main house and gardens.
- 6.60 With such an area close to, but not within, a formal boundary to what was perhaps a minor Tudor and later manor house there is a possibility of ancillary activities such as rubbish pitting taking place here, but the feature identified would appear to suggest some larger area of landscape modification that might most likely be connected to horticulture or water management. The potential for a post Medieval archaeological resource existing here is suggested to be at least moderate and would probably justify an archaeological response such as a watching brief on the proposed works. This would be secured by condition and would respond to the comments raised by the Broomfield House Trust.

CIL

- 6.61 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. Since April 2012 the Mayor of London has been charging CIL in Enfield at the rate of £20 per sqm. The Council is progressing its own CIL but this is not expected to be introduced until spring / summer 2014.
- 6.62 The development would not be liable to a Community Infrastructure Levy contribution.

7. Conclusion

- 7.1 The proposed works would mitigate flood risk in the area. Additionally, it would provide wider benefits in regard to enhancements to the environment through appropriate landscaping and enhancement of biodiversity. The relationship of the application site to the important setting of the Park and Broomfield House, taking account also of the current heritage designations and inclusion on the at risk registers which reflects its current condition, is recognised. Significant weight has been given to the comments of Historic England and the London Parks & Gardens Trust together with the comments from the Friends of Broomfield Park who have provided information on the historic uses of the site and the previous existence of wetlands in this area.
- 7.2 It is therefore contended that the proposed development given its size, siting, form and natural appearance, would cause less than substantial harm and weight has therefore been given to the wider public benefits. These are identified within the "Analysis" section and in particular Para's 6.20 to 6.26. Of particular note is the fact this scheme would seek to mitigate the 36 properties which are identified as being at serious risk of flooding and the 267 properties which are identified as being at moderate risk of flooding. This is a real tangible benefits arising from the scheme and together with the environmental and biodiversity enhancements, is considered to deliver significant wider public benefits that outweigh the less than substantial harm to the designated heritage assets.
- 7.3 The overall quality of the registered garden would therefore benefit the wider population through the improvement of local open space. In this regard, the proposed works underpin the presumption for sustainable development advocated within the NPPF and reiterated within both regional and local level policies.

8. Recommendation

- 8.1 Having regard to the above assessment, it is recommended that in accordance with Regulation 4 of the Town and Country Planning General Regulations 1992, planning permission be deemed to be granted subject to the following conditions:
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.
 2. The development hereby permitted shall be carried out in accordance with the approved plans including plans(s), 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.
 3. All areas of hedges, scrub or similar vegetation where birds may nest which are to be removed as part of the development, are to be cleared outside the bird-nesting season (March - August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably

qualified ecologist will check the areas to be removed immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded, no vegetation clearance or other works that may disturb active nests shall proceed until all young have fledged the nest.

Reason: To ensure that wildlife is not adversely impacted by the proposed development in accordance with national wildlife legislation and in line with CP36 of the Core Strategy. Nesting birds are protected under the Wildlife and Countryside Act, 1981 (as amended).

4. Within 3 months of commencement of works full details of bird and bat boxes shall be submitted to and approved in writing by the Local Planning Authority. Following practical completion of work photographic verification and a brief statement from a Suitably Qualified Ecologist shall be submitted and approved in writing by the council.

Reason: To minimise the impact of the development on the ecological value of the area and to ensure the development provides the maximum possible provision towards the creation of habitats and valuable areas for biodiversity in accordance with Policy CP36 of the Core Strategy, the Biodiversity Action Plan and Policy 7.19 of the London Plan.

5. That development shall not commence until a construction logistics plan has been submitted to and approved in writing by the Local Planning Authority. The construction methodology shall contain:
 - a. a photographic condition survey of the roads, footways and verges leading to the site;
 - b. details of construction access and associated traffic management to the site;
 - c. arrangements for the loading, unloading and turning of delivery, construction and service vehicles clear of the highway;
 - d. arrangements for the parking of contractors vehicles;
 - e. arrangements for wheel cleaning;
 - f. arrangements for the storage of materials;
 - g. hours of work;
 - h. A construction management plan written in accordance with the 'London Best Practice Guidance: The control of dust and emission from construction and demolition' or relevant replacement.

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.