1.0 Recommendation:

1.1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, the Head of Development Management / Planning Decisions Manager be authorised, upon completion of a Unilateral Undertaking to grant deemed consent subject to conditions.
1. Time limit.
2. Phasing of development
3. Accordance with plans
4. Details and plan of security fencing
5. Erection of security prior to competition and perpetuity
6. Details of Development - Access
7. Details of Development – Hardstanding
8. Parking retained for such
9. Details of development - Construction Site Waste Management
10. Details of Development – Cycling storage
11. Construction management plan
12. Electric charging points
13. Details of Development - Landscaping
14. Biodiversity improvements
15. Details of Tree protection plan
16. AIA report
17. Replacement tree
18. Lighting Plan
19. Land contamination (1)
20. Land Contamination (2)
21. Air Quality
22. Construction maintenance activities

2.0 Executive Summary:

2.1 The report seeks to approve full planning permission for a flood alleviation scheme involving re-routing of the Turkey Brook watercourse, between 15m and 25m south of the existing route of the Brook. The scheme includes flood storage areas, combined footpath-cycleway, security fencing and revised landscape appearance and playfield designation.

2.2 Following extensive flood studies in collaboration with the Environment Agency and the Greater London Authority the site has been designated as the preferred location of flood water storage and mitigation measures to prevent and reduce flood risk to 200 properties primarily on the North side of Turkey Brook along Beaconsfield Road. The re-routing of the river is a key aspect of the flood mitigation plan and has included significant modelling of the Brook.

2.3 As a result of the flood alleviation scheme a significant percentage of playfields located on Albany Park currently utilised almost exclusively for football would be
reduced by 47%. Sport England have objected to the loss of designated playing fields as a result of the scheme and following significant correspondence and consideration of future reduction in demand as per the Enfield PPS, retain their standing objection.

2.4 The merits and special significance of the development to prevent future flooding of residential properties and subsequently provide a rich biodiversity environment open to the local community have been considered and weighed against the loss of designated playfield space. While in isolation this would be contrary to relevant national, regional and local planning policies, the benefits of flood prevention and other accumulated community value and improved biodiversity in this instance outweigh it is considered the objection by Sport England and warrant a departure from planning policy.

2.5 The principle reasons for recommending approval are,

i) The prevention and reduced risk of Flooding to 200 local residential is of significant consideration and has been based on an acceptable cost/benefit analysis meeting EA guidance.

ii) Improvements to the Biodiversity and landscaping of Albany Park including more assessible water features, 100 trees planted and a greater range of biodiversity habitat.

iii) A sustainable and good level of security similar to the existing shall be provided to the rear boundaries of properties on Beaconsfield Road to mitigate the loss of the existing course of Turkey Brook.

vii) The Enfield PPS provides material analysis the future demand of football pitches in the borough up to 2037 shall have adequate a capacity to absorb the demand and requirement of the 11 x 11 and 9 v 9 pitches to be lost on site, thereby reducing in no demand deficit.

3.0 Site and Surroundings:

3.1 Albany Park is 4.1ha, located in the north of the Borough to the east of the A10, south of Turkey Brook and north of Bell Lane. The mainline railway line runs along the eastern boundary and forms part of a wildlife corridor. The site is designated Metropolitan Open Land, Local Open Space and forms part of a
wildlife corridor. The east half of the site and the western portion of Beaconsfield Road located to the north of the site are designated Flood Zone 2.

3.2 Albany Park is principally used for sporting and leisure activities. Currently between 9 and 13 pitches are provided at any one time subject to playing capacity and demand for the pitches. In addition, two all-weather basketball/multi use courts are located on the west side of the park alongside designated parking to the north-west of the site. No structures are located within the designated site plan however a small changing facility is located on the western fringe of the park prior to the transition of the park to residential streets.

3.3 Turkey Brook runs along the north of the park creating a strong and physical boundary between Albany Park and the rear boundaries of residential properties on Beaconsfield Road. Turkey Brook is not a natural feature and has been heavily engineered with concrete and masonry walls on both sides of the channel.

4.0 Proposal:

4.1 The planning application seeks approval for a flood alleviation scheme involving construction of a new watercourse, flood storage area and combined footpath-cycleway involving excavation works. The new river channel shall run south of
the existing brook and have more of a meandering course compared to the existing linear man-made Turkey brook. In addition to the partial re-routing of the existing watercourse, wetland basins and additional landscaping, including significant tree re-planting to the Albany Park shall be undertaken to the north, east and southern boundaries of the site. The principle development on site shall include

- Naturalise a 350m long section of the Turkey Brook main river
- Create a flood storage area that will reduce flood risk to over 200 local properties
- Create additional wetland features to manage surface water runoff
- Enhance wildlife habitat by extending areas of wildflower and scrub vegetation, and planting trees
- Create new amenity features including seating areas and footpaths

An illustrated cross-section of the proposed re-routing of the Turkey Brook is provided below,

5.0 Relevant Planning History:

5.1 Reference - 16/00371/CEU Description of development - Use of tennis courts as parking area.
Decision level – Delegated
5.2 Reference - 18/03235/SO
Description of development - Environmental Impact Assessment Screening
Decision Level – Delegated
Decision Date – 21/09/2018

6.0 Consultation:

Public

6.1 Consultation letters were sent to 180 neighbouring properties (21 days expired 29th August 2019) and a press advert was placed in the local newspaper (07/08/2019). In addition to the statutory consultations, the developer has held public consultation meetings on Albany Park during October 2017 to both advertise the development and seek comment from affected and none affected local people. One comment has been received neither objecting to supporting the development, summarised below

- Proposal appears good on paper
- Concerns at the loss of an excellent security barrier to the rear of properties
- Additional security should be at the developers cost not the residents.

Statutory and Non-Statutory Consultees:

6.2 Internal Consultations:

6.2.1 Transportation & Transport – No objection in principle to the loss of 7 parking spaces with the additional trips to the site would be likely to be via local persons and via walking or cycling. – See transport for greater analysis.

6.2.2 Heritage – No objection, see principle section of report

6.2.3 Environmental Health officer – No objection subject to conditions to monitor dust and other potential disturbance resulting form works.

6.2.4 Tree officer – No objection, the re-planting of tree is welcomed.
6.3 **External Consultees**

6.3.1 MET Police – No objection in principle and condition recommended

6.3.2 Thames Water – No objection

6.3.3 Environment Agency – No objection but request planning conditions. The EA have been involved in the design of the flood alleviation scheme and support the principles and proposed outcomes of development. See Principle of development for further analysis

6.3.4 Network Rail – No objection.

6.3.5 Sport England – Objection. Sport England object to the cumulative loss of playing fields as a result of the development. No replacement provision or enhancement of other sites has been offered or provided.

6.4 **Officer comments**

The majority of the consultees are supportive of the development and provide no objection to the scheme subject to application of appropriate conditions. Following discussions between with Sport England regarding the options to mitigate the loss of playing fields, Sport England continue to object to the loss of playing fields on site. The principle of the objection shall be discussed further in the analysis of the report.

7.0 **Relevant Policies**

7.1 **NPPF (Adopted February 2019)**

Section 8 Promoting healthy and safe communities Para 96-101
Section 14 Meeting the Challenge of Climate Change flooding and coastal Change, Para 155-163
Section 15 Conserving and enhancing the natural environment, Para 174-177

7.2 **London Plan (2016)**
7.3 The London Plan – Draft

A draft London Plan was published on 29 November 2017 for consultation purposes with a deadline for consultation of 2 March 2018. The policies in the draft plan will grow in terms of the weight they can be given as the Plan procedures through the adoption process. The Plan has been subject to an Examination in Public and the report on individual policies is now with the Mayor for review. Certain policies if unchallenged will attract weight as a material consideration in determining applications.

7.4 Core Strategy

CP11 Recreation, leisure, culture and Arts
CP21 Delivering sustainable water supply, drainage and sewerage infrastructure
CP25 Pedestrians and cyclists
CP28 Managing Flood Risk through development
CP29 Flood Management Infrastructure
CP30 Maintaining and improving the quality of the built and open environment
CP34 Parks, Playing fields and other open spaces
7.5 Development Management Document

DMD 37 Achieving high quality and design-led development
DMD 44 Conserving and Enhancing Heritage assets
DMD 45 Parking standards and layout
DMD 59 Avoiding and reducing Flood Risk
DMD 60 Assessing Flood Risk
DMD 61 Managing surface water
DMD 62 Flood Control and Mitigation Measures
DMD 63 Protection and improvement of watercourse and flood defences
DMD 64 Pollution control and assessment
DMD 71 Protection and enhancement of Open space
DMD 72 Open Space provision
DMD 74 Playing pitches
DMD 75 Waterways
DMD 76 Wildlife Corridors
DMD 79 Ecological Enhancements
DMD 80 Trees on development sites
DMD 81 Landscaping

7.6 Other Relevant Policy and Guidance

National Planning Practice Guidance (NPPG)
LBE – Draft Stage D Playing Pitch Strategy (April 2018 – March 2023)
Sport England – Playing fields policy and guidance (March 2018)
Enfield Local Football facility plan (June 2019)
Heritage Strategy SPD

8.0 Analysis

The main considerations of the development are the following,

- Principle of flood mitigation measures
- Principle of loss of playing fields
- Impact on the character and landscape of Albany Park and the Turkey Brook waterway
- Impact of trees
- Impact on parking and access
- Impact on neighbouring security and amenity
- Other matters

**Principle of Flood Mitigation measures:**

8.1 The updated and adopted NPPF (February 2019) provides strategic guidance on the provision and need of flood defences especially in light of climate change. Paragraphs 149 of the NPPF states

*(Para 149) Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.*

8.2 Paragraphs No 155 – 165 principally deal with new development and the implications to flood risk of the site. The NPPF and Policies CP28, DMD 59 and r DMD 60 of the Core Strategy and Development Management Document provide defined guidance relating to retro-fit changes to a landscape to protect existing built development from flooding, nevertheless the merits of such development are supported. The map below illustrates the site and the Flood zone 2 to which the development aims to reduce via the re-routing of the brook.
8.3 BMT WBM Ltd were commissioned by the Council to assess the fluvial flood risk from the Turkey Brook with the aims to confirm the areas at risk of fluvial flood risk and to assess the feasibility of implementing Flood Alleviation Scheme/s (FAS) to mitigate this risk. This location has been identified for development on account of a recently completed flood study identified which concluded that if the river were to come over the bank at this location it could flood over 200 properties to the north and south of the park. Hydraulic modelling carried out as part of this study indicates that this would happen for a flood event with a 1% annual probability with the effects of climate change considered.

**Rationale for the Albany Park location**

8.7 In support of the Flood Alleviation Scheme at Albany Park, the applicant has submitted a Flood Risk assessment FRA (Prepared by BMT dated July 2019) and a Flood Alleviation Scheme Design Development and Optimisation report (Prepared by BMT dated July 2019). The reports include a thorough assessment of the principles including other site options for Flood water storage and cost/benefit analysis.
8.8 As an alternative, consideration was given to developing the Whitewebbs Golf Course as an option to store excessive water however the FRA report concluded Whitewebbs Golf Course already acts as a storage area and is currently forecast as being inundated for all simulated flood events. In addition, creating additional storage in this location would likely require regrading of the existing ground levels and/or increasing the crest height of the pedestrian track. As such the Albany Park location as considered as representing the preferred suitable option.

8.9 Assessment of the preferred location is considered in tandem with a cost/benefit analysis as outlined in section 6.4 of the Flood Risk Assessment FRA. A benefit cost ratio has been calculated for the proposed mitigation scheme at Albany Park. This provides an estimate of the initial economic feasibility of the project. A ratio of greater than 1.0 indicates that the benefits of the scheme outweigh the costs and it should be considered for further study or implementation. The cost of the development would amount to £1,411,081 but with calculated corresponding benefits of 2,557,609 thereby representing a cost / benefit of 1.81, above the benchmark of 1.0 cost benefit requirement.

8.10 In summary, the proposed mitigation schemes at Whitewebbs Golf Course and Forty Hall were discounted due to design constraints and ineffectiveness at reducing downstream flood risk within the Turkey Brook catchment. Further investigation and testing were conducted on the Albany Park and based on the model results at Albany Park, the study concludes that Albany Park is the preferred option on the basis of both technical water storage capacity and with the best cost benefit ratio. conclusion

8.11 The Environment Agency have been involved in the design of the scheme and as part of their support, have part funded the project. They remain engaged and supportive.

8.12 The principle of the flood defence is considered to accord with the aspirations of the NPPF, Enfield Core Strategy and Development Plan Document to prevent flooding and future proof properties and communities from climate change. In addition, other benefits such as the creation of wetland features, enhanced wildlife habitat and upgrading of new amenity features including seating areas and footpaths.
8.5 The updated and adopted NPPF (February 2019) provides strategic guidance on the provision and retention of open space for recreation, outlined primarily in paragraphs 96 and 97 provided below.

i) Paragraph 96 - Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

ii) Paragraph 97 - Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

8.6 London Plan Policy 3.19 states Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted. In addition, London Plan Policy 7.17 (Metropolitan Open land) states, the strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.

8.7 Core Strategy Policy 11 (Recreation, Leisure, Culture and Arts) seeks to protect existing assets and provision, and promote and encourage the increased use of
recreation, leisure, culture and arts facilities in the Borough by: Resisting the loss of existing recreation, leisure, heritage, culture and arts facilities, unless it can be demonstrated that they are no longer required or will be provided elsewhere;

8.8 Policies DMD 71 “Protection and Enhancement of Open Space” and DMD 74 “Playing Pitches” all provide material considerations affected by the proposed flood defences.

The details of policy DMD 74 relating to playing pitch development are provided below,

1. Development involving the loss of playing field land and sports pitches will not be permitted.

2. The preference for new playing field land and sports pitches is natural grass pitches. The Council will only permit artificial grass pitches if all of the following criteria are met:
   a. The location must have very good accessibility by public transport;
   b. The site must have adequate road access and be able to accommodate car parking;
   c. The site must be level and have suitable ground conditions;
   d. The proposal must not harm the character or appearance of the area;
   e. There is no harm to residential properties in terms of noise and light pollution;
   f. There is no adverse impact on local flora and fauna;

3. Applications for new artificial pitches must provide details of proposed landscaping, enclosure and lighting. Applicants must demonstrate how lighting has been designed to prevent loss of amenity to local residents or harm to biodiversity.

4. Applications for artificial pitches that incorporate flood lighting on Metropolitan Open Land and in the Green Belt will be refused unless justified through very special circumstances.

8.9 The proposed flood protection scheme would result in the cumulative loss of playing field space due to the design of the re-routed river and the need for storage of water on site. Officers have calculated that the site currently has the capacity for the following: six (6) pitches on North side (formed of 1 x 11, 1 x 9, 1 x 7 and 3x small 5 a side) and six (6) pitches on the South side (formed of 3 x 9,
However, the applicant has provided an existing pitch layout with nine (9) pitches representing a difference of three (3) pitches from the officer’s calculation. The difference is explained in how officers have sought to optimise number and pitch size and would represent the maximum volume on site (full capacity) and therefore unlikely to be a regular accordance.

8.10 Following the proposed flood alleviation scheme the number of pitches would be reduced to seven (7) pitches formed of North side (1 x 11, 2 x 7 & 1 x 9) South side (1 x 7 & 2 x 9) as shown below,

Based on the applicant’s comparison of the current and proposed pitch layout, two 1 x 9 a-side and 1 x 11 a-side pitches would be lost following the flood alleviation scheme. The designated area of playing field currently on site is approximately 32,000m²; following the proposed changes the available playing field area would be reduced 18,000m² representing a loss of 47%. During the site visit, the layout of the pitches was that provided by the applicant, based on the nine (9) football pitch layout. Nevertheless, as highlighted in Sport England’s response, consideration of playing fields is based its availability for all sports not just football and therefore the quantum of playing field area should also be a consideration.

*Illustration of the existing Pitch layout*
Justification for the loss

8.11 The loss of playing field space is a departure from planning policy and therefore the benefit of the scheme needs to be addressed against the planning field loss and other pertinent material considerations. The applicant has provided a “playing pitch assessment” (dated July 2019) to justify the loss of the playing field space and provide the rationale for the approval of the development. The applicant has assessed the Council’s Playing Pitch Strategy (PPS) dated April 2018 and discussions with the Parks Department regarding the current and expected usage of the facilities at Albany Park. The applicant states there are adequate pitches locally with capacity to accommodate the loss of playing pitches at Ponders End recreation Ground, Enfield Carterhatch and Firs Farm. The report summarises capacity for adult full size pitches across Enfield is 25 Match equivalent sessions and (it is also noted that users of adult pitches are often not local to the site and therefore using alternative facilities elsewhere in Enfield is unlikely to have significant impact on users)

8.12 The Council’s Playing Pitch Strategy (PSS) is a document compiled to analyse and assess existing sport infrastructure provision within Borough and identifies both current and potential demand. The PPS enables the Council to ensure that
the right type and quality of new pitches are provided as part of new developments and future growth across the Borough. The sports the PPS relates to are Football, Rugby Union, Hockey, Cricket, Tennis and Netball. The LPA has assessed the information within the PPS and confirm there is a borough wide surplus and over-supply of 25 adult 11 v 11 match equivalent sessions for future match equivalent session actual peak time demand.

**Sport England**

8.13 Sport England are a statutory consultee where a development involves the loss and/or alterations to playing fields. They have produced guidance in the form of the "playing fields policy and guidance (dated March 2018). Section 6.1 of the document provides the five (5) exception tests whereby the loss may be justified:

**Exception 1**
A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport

**Exception 2**
The proposed development is for ancillary facilities supporting the principal use of the site as a playing field and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

**Exception 3**
The proposed development affects only land incapable of forming part of a playing pitch and does not:
- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any part of a playing field and any of its playing pitches.
Exception 4
The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:
- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5
The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

8.14 Against these criteria, the applicant has provided no replacement designated open space to re-provide the quantum of playfields lost via the development, there is no tangible investment to either upgrade or provide new sporting facilities (be it toilet facilities or 3G pitches) has been confirmed or allocated to other locations in the borough, no indoor facilities have been provided (representing a resource permitting greater intensity of use) and the development is not related to ancillary sports facilities on site. The only exception with any merit to justify the loss of the playing fields is Exception 1.

8.15 In correspondence with Sport England officers have sought to confirm whether the “surplus capacity” of football pitches in the borough, especially 11 vs 11 adult pitches, represents a suitable “excess of playing field provision in the catchment area and therefore can be considered within the criteria of exception 1. Sport England have considered this but conclude on the basis the development and its subsequent loss of playing fields, fails to accord with the aspirations of the NPPF and fails to meet the five (5) exception tests. Sport England therefore object to the development and are concerned about the reduction in playing field land in principle. In this respect, both Sport England’s Playing Field Policy and the National Planning Policy Framework (NPPF), paragraph 97, makes specific reference to the protection of playing field, not just the playing pitches. Playing fields are used wider than just the playing pitches, for example providing areas for informal play/sport away from the pitches, allowing pitches to be rotated/shifted, are adaptable to future trends such as increases in popularity of some sports and many more. Sport England object to any proposals that results
in the loss, reduction or prejudges the use of playing fields unless the scheme meets one, or more, of its exceptions in its Playing Field Policy.

8.16 Sport England consider “Exception 1” to relate to circumstances where there is an identified surplus of playing field land. In reality this is difficult to justify within London, due to the increasing population numbers and residential developments in the area as well as the increasing popularity of formal and informal sport and recreation. Sport England would only consider a site, or part of site, is truly surplus if it has been robustly strategically identified in a strategy. The Council’s Playing Pitch Strategy (PPS) does not identify this specific site as surplus but actually sets out clear actions to improve the site to meet current and future needs. The PPS also clearly states that all playing field, and most playing pitches, should be protected within the borough.

8.17 Beyond the principle of loss of playing fields Sport England question and argue the link between over-supply and surplus. Over-supply does not mean a surplus of provision as the Borough would need a spare capacity of pitches to address any unforeseen circumstances and implications of wet weather to avoid the potential backlog of fixtures that this can cause. Furthermore, there is considerable growth occurring in the borough which, although forecasted, can only really be truly understood once significant schemes come forward.

8.18 In conclusion therefore Sport England does not consider that the playing field is surplus and consequently it does not consider that the proposal would meet Exception 1 of its Playing Field Policy. Clarification has been sought from the Council’s Sport and Physical Activity Manager regarding future and on-going sporting upgrades in the borough, either via Enfield council or in partnership with the football foundation. However there are no plans for upgrades in the borough.

8.10 Notwithstanding the significant weight that must be assigned to the standing objection from Sport England to the quantum of playing field loss, it is considered weight can also be assigned to the benefit of the flood alleviation scheme to protect 200 residential homes from increased flood risk and wider landscaping and environmental improvement supersedes the requirement to protect playing field area constitute m². This benefit is considered to present sufficient material weight to justify setting aside the objection from Sport England. In this regard, it is also noted that no designated Metropolitan Open Land (MOL) is lost as a result of the re-routing of the water course and some weight can be assigned to the Enfield PPS forecast document. The LPA continue to give weight to the retention of playing fields in the borough and in no way does the current
development recommended for approval on Albany park represent a change in material policy towards playing field policy DMD 74 of the Development Management Document (adopted 2014). However, it is felt the current flood alleviation scheme represents special circumstances and can only be assessed in light of the environmental flood risk to residential properties and commercial premises with the minimum impacts to sporting source in the borough.

Impact on the character and landscape of Albany Park and the Turkey Brook Water course:

8.20 Albany Park is open in nature and is principally utilised for football pitches with a light mature tree coverage to the east and north adjacent the brook and newly planted trees across the central belt of the park. The Turkey Brook is a linear 350m channel with concrete flank walls on the park side (south) and a mix of soft sides and concrete on the Beaconsfield side of the Brook. The Brook is flanked on the park side by a pedestrian walkaway also utilised for cycling and has three bridges across the brook with rights of way.

8.21 The proposed flood alleviation scheme would significantly alter the character and formation of Albany Park. The North of the site would benefit from the greatest transformation on account of the southward re-routing of the water course (Turkey Brook) resulting in a 50 metre deep area southward of the existing Turkey Brook formed of raised areas, wetland formation and tree planting as a result of Spoil from the excavated new river. The existing bridges would be removed but the rights of way retained. The south of Albany park, especially the south-west portion would benefit from a similar scope of works projecting approximately 60 metres from the southern boundary at its greatest extent forming three areas of wetland storage and raised areas. The western boundary adjacent the Railway line would witness the least changes albeit would include raised areas and tree planting.

8.23 Policy DMD 75 (Waterways) states all development proposed on or close to the riverside must protect and enhance the waterfront character. Developments should maximise opportunities to provide publicly accessible riverside greenways or shared routes. In addition to the above the waterways in Enfield have provided some heritage value. In this instance the proposed re-routing of the Turkey Brook would have no discernible negative impact on the access to the waterway and arguably improve the relationship with park walkers. The 350m section of the Turkey Brook under consideration holds no heritage value and the heavy
engineering that has to date been undertaken creating an unnatural linear line is not reflect of the natural course.

8.22 In conclusion, officers are supportive of the landscaping works providing an attractive and visually interesting parkland area with the encouragement of a wider level of biodiversity on site. It is recognised a good level of detail has been provided including levels throughout the site, further landscaping details shall be requested as part of a robust condition to include but not limited to replacement and new lighting, details of the footpaths throughout the park.

**Impact of trees:**

8.23 The applicant has provided a Planting species list and a Tree report (Dated 01/07/2019) confirming eighteen (18) trees shall be lost as a result of the development, mainly in close proximity to the Turkey brook and only on account of the construction and flood remediation activities. To mitigate the loss of the trees 100 trees shall be planted to replace the removed ones and located throughout the park and in the location of the those lost to enable the development. During the construction phase, tree protection zones and apparatuses shall be erected to protect the existing trees and their respective root protection areas.

8.24 The 100 new trees to be planted on site would constitute a varied species and type with a large proportion of which will be of a size at least standard to heavy standard and with at least a 2 year establishment after-care programme to ensure Albany Park has a significant net gain of quality trees by the completion of this scheme. In addition to the trees to be planted on site, a brief Arboricultural Method Statement (AMS) to be read in conjunction with the Tree Report sections Tree Protection Plan shall lay down the methodology for any demolition and/or construction works.

8.25 In conclusion the replanting of 100 trees and the attention applied to improving the quality of the park for the community is welcomed. Further detailed information shall be requested at condition stage to provide details of the age and location of trees on site.
Impact on parking and Access:

8.30 The proposed development aims to increase the number of people visiting the park and therefore the trip generation shall increase however it is likely that these will be local trips either cycling or on foot. Therefore, it is unlikely that there will be significant impacts on the local highway network. The existing car park on site would be reduced in capacity from 47 spaces to 40 representing a cumulative loss of seven (7) car parking spaces. Transportation have assessed the on-site parking and considers it caters for specific events which occur outside of peak hours, therefore the likely impact on the surrounding area of reducing the car parking provision is low and temporary. Further the LPA aspiration is for parking on dedicated MOL land should be converted to green infrastructure.

8.32 Cycle Parking shall be conditioned on site to encourage people to cycle to the site potentially reducing vehicle trips. The site of cycling parking shall be requested as part of the landscape plan and form a separate condition.

Impact on neighbouring security and amenity:

8.33 The proposed Flood alleviation scheme involves the infilling the existing Turkey brook located to the immediate rear boundaries of properties on Beaconsfield Road. The existing route, railings and depth of the Turkey Brook provides a strong defensive barrier to the rear gardens of properties on Beaconsfield Road and therefore its proposed removal and infilling would potentially leave the rear boundaries exposed to the public. It is acknowledged such open and undefended boundaries are not unusual on MOL and local open land, but their existence would lead to security concerns. The applicant has therefore confirmed a Weld Mesh Panel Security Fencing (2.4m high) and a hedge consisting of spiny native species to include Hawthorn and Blackthorn shall be planted densely in a double staggered row approximately 1m tall at time of planting with an aftercare maintenance program to establish the hedge. An example of the fencing is illustrated shown below
8.34 It is considered the security mitigation proposed would be adequate however an additional row of mesh fencing would be optimum and as such a pre-commencement condition shall be requested as part of a pre-commencement planning condition.

8.35 Beyond the concern at security to the rear boundaries of the properties on Beaconsfield road the LPA does not consider other aspects of the development to result in harm to the residents of Beaconsfield Road.

**Other Matters:**

8.49 In addition to the security concerns to the rear boundaries on properties on Beaconsfield, the new trails and paths in addition to the additional changes to the level, would need to be adequately lit. A condition controlling the details is therefore recommended.

8.50 A gas pipe is located in close proximity to Turkey Brook and Cadent Gas have been contacted by the applicant and agreements are in the process to divert the high pressure gas pipeline.

8.60 The applicant had submitted a Biodiversity report (Preliminary Ecological appraisal (Comprising an extended Phase 1 Habitat) prepared by GS Ecology - Dated 27-07-19). The report concluded, the site comprises a heavily modified stream adjacent to a large, predominantly amenity grassland, park. The
proposals will re-naturalise the stream and create new wildlife friendly habitats within the park. This will result in a significant benefit for biodiversity.

8.60 The applicant has also provided a Construction Method statement providing a brief outline of the methods of the development. Nevertheless, a more detailed and expansive Construction Management Plan (CMP) written in accordance with the Mayor of London's supplementary planning guidance shall be required prior to commencement of development. The CMP shall include but not limited to 'the Control of Dust and Emissions During Construction and Demolition' detailing how dust and emissions will be managed during demolition and construction work shall be submitted to the local planning authority for approval.

9.0 Planning Obligations:

9.1 The outline planning application is subject to a Unilateral Undertaking legal agreement for £10,000 to funds to cover the costs to the Council of proactive monitoring by staff, which will be needed to ensure that there is no undue noise and disturbance from the three development areas and to ensure that all planning conditions and Section 61 agreement conditions are being complied with.

10.0 Community Infrastructure Levy (CIL)

10.1 The development is proposing no structures and therefore Mayoral or Enfield Council CIL is applicable on the site.

11.0 Conclusion

11.1 The merits and special significance of the development to prevent future flooding of residential properties have been considered and subsequently provide a rich biodiversity environment open to the local community, versus the loss of designated playfield space. The objection of Sports England is given significant weight but subject to appropriate conditions related to security and final landscaping details, it is considered a departure from planning policy is appropriate and acceptable in this instance, in light of the special nature of the development supported by the Environment Agency and Greater London Authority who are part funding the scheme in partnership with the Council.

11.2 The proposal is therefore recommended for approval subject to a unilateral undertaking and planning conditions.
12.0 Recommendation

That, Full PLANNING PERMISSION BE GRANTED subject to a Unilateral Undertaking legal agreement and planning conditions;
Albany Park River Restoration and Flood Alleviation Scheme – Planting Species
1st July 2019

Please refer to attached drawing for extent of planting areas

Wetland Planting

Treatment Cells

- Apium nodiflorum
- Acorus calamus
- Butomus umbellatus
- Carex riparia
- Glyceria maxima
- Phalaris arundinacea
- Schoenoplectus lacustris
- Eleocharis palustris
- Carex rostrata
- Sparganium emersum
- Mentha aquatica
- Iris pseudacorus

Wildlife Amenity for Wetland Cells and River Edge

- Alisma plantago-aquatica
- Apium nodiflorum
- Butomus umbellatus
- Carex acutiformis
- Eupatorium cannabinum
- Fillipendula ulmaria
- Glyceria fluitans
- Iris pseudacorus
- Persicaria amphibia
- Rorippa nasturtium
- Lysimachia vulgaris
- Mentha aquatica
- Myosotis scorpioides
- Potentilla palustris
- Veronica beccabunga
- Juncus effuses
- Potentilla palustris
- Hippuris vulgaris
- Sagittaria sagittifolia
- Polygonum amphibium
- Lythrum salicaria
- Hydrocharis morsus-ranae
- Caltha palustris

**Wildflower Meadows**

Using a seed mix to include
- Centaurea nigra
- Daucus carota
- Galium verum
- Knapthia arvensis
- Leontodon hispidus
- Leucanthemum vulgare
- Lotus corniculatus
- Malva moschata
- Plantago lanceolata
- Primula veris
- Prunella vulgaris
- Ranunculus acris
- Common Knapweed
- Wild Carrot
- Lady's Bedstraw
- Field Scabious
- Rough Hawkbit
- Oxeye Daisy
- Birdsfoot Trefoil
- Musk Mallow
- Ribwort Plantain
- Cowslip
- Selfheal
- Achillea millefolium

**Shrub Layer**
- Viburnum opulus
- Corylus avellane
- Rhamnus frangula
- Cornus sanguinea
- Ligustrum vulgare
- Prunus spinosa
- Crataegus monogyna

**Tree Species**

- Alder (Alnus Glutinosa)
- Willow (Salix Alba)
- Goat Willow (Salix Caprea)
- Black Poplar (Populus Nigra)
- Swamp Cypress (Taxodium Distichum)
- Metasequoia
- Lime (Tilia sp.)
- Oak (Quercus)
- Birch (Betula pendula and pubecens)
- Hornbeam (capinus Betula)