

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 29 September 2020

Report of
Head of Planning

Contact Officer:
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Ward: Southbury

Application Number: 20/00788/OUT

Category: Major

LOCATION: Colosseum Retail Park, Dearsley Road, London, EN1 3FD

PROPOSAL:

HYBRID PLANNING APPLICATION for the phased demolition of all existing buildings and structures, site preparation works and the comprehensive residential-led mixed use redevelopment of Colosseum Retail Park comprising:

DETAILED planning application for the construction of four buildings (with maximum heights of up to 126.000 m A.O.D. (Block A, 29 storeys), 56.950 m A.O.D (Block B, 9 storeys), and 88.950 m A.O.D. (Block C, 18 storeys), and 54.525 m A.O.D. (the Work Hub, 6 storeys)) comprising 444 residential dwellings (Use Class C3), 5,802 sqm (GEA) of flexible commercial floorspace including a Work Hub (Use Classes A1, A2, A3, A4, B1, D1 and/or D2), ancillary car/cycle parking, amenity, plant, all other associated public, communal and private realm, soft/hard landscaping, infrastructure, access and highway works, and any temporary landscaping, parking and access arrangements; and

OUTLINE planning application (with all matters reserved) for the construction of six development plots (with maximum building heights of up to 89.950 m A.O.D. (Plot D), up to 75.700 m A.O.D. (Plot E), up to 50.100 m A.O.D. (Plot F), up to 111.850 m A.O.D. (Plot G), up to 79.950 m A.O.D. (Plot H), and up to 88.750 m A.O.D. (Plot J)) comprising up to 143,000 sqm (GEA) residential floorspace (Use Class C3) including any ancillary internal parking, amenity, and plant; up to 1,600 sqm (GEA) of flexible commercial floorspace (Use Class A1, A2, A3, A4, B1, D1 and D2), and all other associated public, communal and private realm, soft/hard landscaping, infrastructure and highway works, access and a new internal road network. ((An Environmental Statement, including a non-technical summary, also accompanies the planning application in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)). Demolition of existing office buildings and erection of buildings between 2 to 17 storeys high comprising offices (use class B1), 216 residential units (use class C3) and dual use cafe (use class A3 / B1) together with access, basement car park and Energy Centre, cycle parking, landscaping and associated works.

Applicant Name & Address:

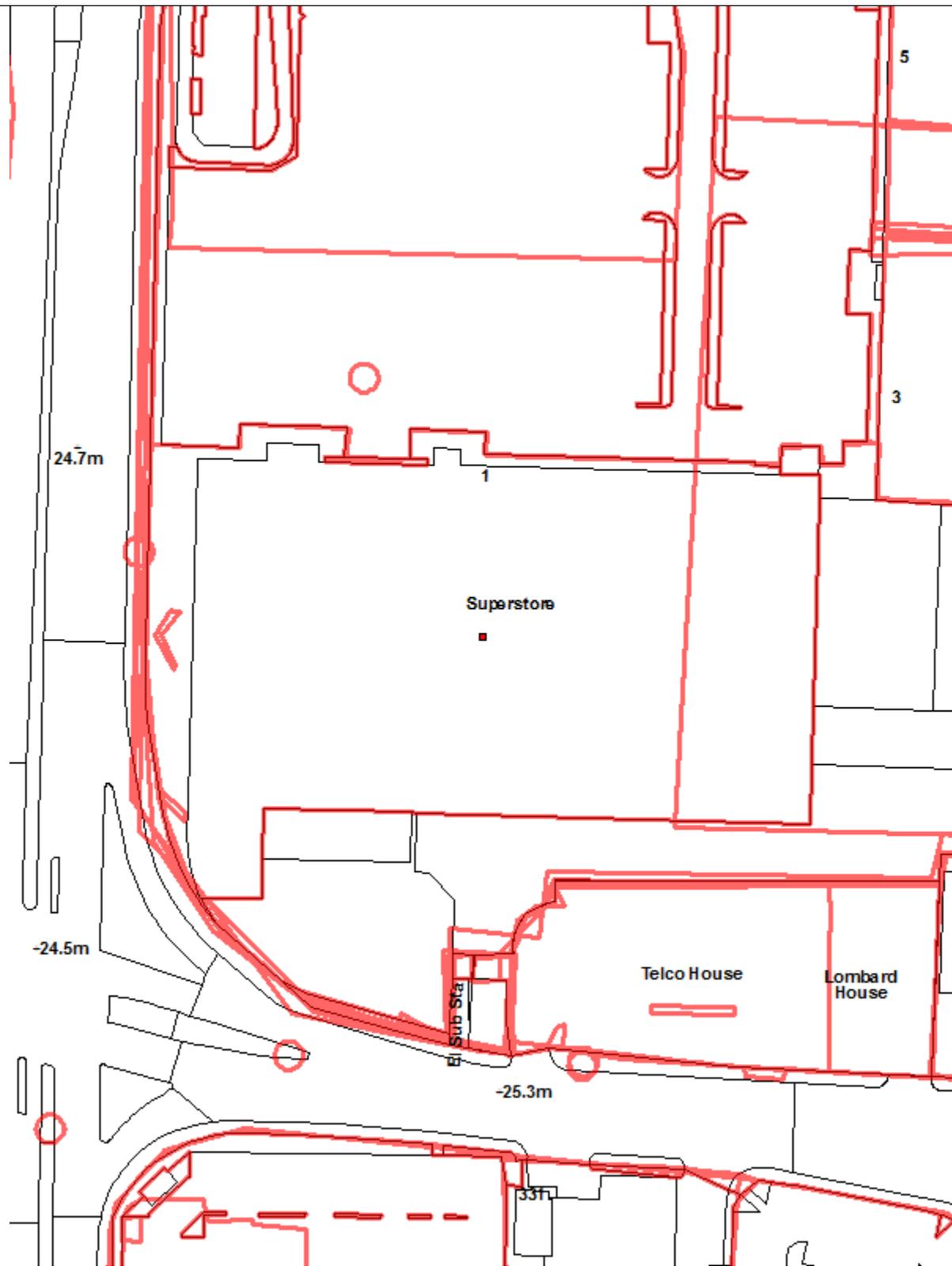
BlackRock and NEAT Developments
Limited, C/O Agent

Agent Name & Address:

Turley, 8th Floor, Lacon House 84
Theobalds Road London WC1X 8NL

RECOMMENDATION:

That subject to the completion of a S106 to secure the matters covered in this report, the Head of Development Management/ the Planning Decisions Manager be authorised to **GRANT** planning permission subject to conditions.



1.0 EXECUTIVE SUMMARY

- 1.1 This is a large (4.2 hectare) out of town retail park that currently accommodates a range of 'big box' retail and leisure uses (approx. 15,000sqm). It is part of a designated Retail Park in the North East Enfield Area Action Plan, lies within or partly within Local Important Views 2 and 9 and is next to designated Strategic Industrial Land (SIL) and Metropolitan Open Land (MoL). It has a PTAL of 3 (although the southern part is expected to have a PTAL of between 3 and 4 by 2031).
- 1.2 Intend to Publish London Plan Policies SD7 and H1 call for the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. The existing buildings that occupy the site have no architectural merit and detract for the appearance of the area. The phased comprehensive redevelopment of the site is acceptable in principle. Development plan policies enshrine a strong 'town centre first' principle and the loss of the existing retail and leisure uses is acceptable. The loss of the existing leisure use (Buzz Bingo) is also acceptable, although it is acknowledged that the loss of this use would have a differential impact on older women, that needs to be mitigated. The proposed new business use is welcomed and would help ensure that there would be a net increase in jobs on the site, despite the significant net reduction in non-residential uses. This is an accessible brown field site in relatively low density use and whilst high noise levels and poor air quality raise particular challenges, a housing-led mixed-use scheme is acceptable in principle.
- 1.3 There is a pressing need for housing, including affordable housing, and Enfield has a challenging 10-year housing delivery target. Given the partly 'outline' nature of the proposed scheme, the overall number of homes is uncertain at this stage, but it would be likely to deliver between 1,587 and 1,800 homes.
- 1.4 Based on the Illustrative Scheme (1,587 homes), indicative dwelling mix and proposed 35% by habitable room (32:68 London Affordable Rent: Shared Ownership), the total amount of affordable housing across both phases would be 477 homes (134 London Affordable Rent and 343 Intermediate homes) by habitable room. This would amount to 30% by unit. This is below the Local Plan target of 40% by unit and would not meet the Local Plan tenure split target for this part of the borough of 60:40 split (London Affordable Rent: Shared Ownership). However, scrutiny by consultants acting for the Council have concluded that the proposed scheme is unviable and does not provide sufficient profit to meet an appropriate Minimum Developers Return. In other words, it can be seen as being beyond the 'maximum reasonable amount' called for by London Plan and Local Plan policies.
- 1.5 The proposed affordable housing would provide a reasonable dwelling mix, although with less family-housing than Local Plan policy calls for and be generally well integrated with other housing tenures. The proposed London Affordable Rent and Shared Ownership homes would meet the Mayor's affordability criteria. The Council would be offered "first option" at buying the London Affordable Rent and Shared Ownership homes in Phase
- 1.6 Officers have secured improvements in the amount and type of affordable housing over the course of discussions at pre-app and determination stages to raise the overall amount to 35% and the proposed tenure mix to 32:68

London Affordable Rent: Shared Ownership (by habitable room). On balance, officers consider the proposed offer to be acceptable, subject to Early, Mid and Late stage review mechanisms.

- 1.7 Overall, officers consider the proposed design to be acceptable. The 'full' detailed scheme for Phase 1 and the proposed parameters and Design Code for Phase 2 are based on a layout that responds well to the harsh environment around it and would safeguard existing industrial uses and bus infrastructure. Both elements would also create a good 'internal' environment for new residents, optimising the amount of proposed open space, including active/playful streets and public realm and connecting well with the surrounding area. Hard and soft landscaping would be of a high-quality, helping to create what should be a much greener, inclusive, safe, secure and attractive new place.
- 1.8 The proposed massing strategy based on a 'family' of building typologies with their different scales, features, articulation and rooflines and the use of a common palette of materials, should create a varied and distinctive character. The proposed tall buildings have been scrutinised in detail and, whilst some concern has been raised regarding the particular height of the tall buildings proposed in this location, given the high-quality of their design, the limited harm that would be caused and the merits of the scheme as a whole, including optimising the development of a currently under-utilised site, officers consider them to be acceptable.
- 1.9 The orientation and layout of proposed homes is considered acceptable and it is hoped that a higher percentage of dual-aspect properties is delivered in Phase 2. All of the proposed homes would meet required internal (floorspace, layout, floor to ceiling heights etc.) standards and outdoor amenity space standards and the inclusion of some internalised amenity spaces is considered acceptable in this case. Subject to recommended conditions and s106 obligations, a good level and quality of play space is proposed, with the needs of older children being partially met offsite. Residents of the new homes would have acceptable levels of privacy, daylight and sunlight. Subject to recommended conditions, the proposed scheme should provide an acceptable internal noise and air quality residential environment and outdoor amenity space should be useable and pleasant.
- 1.10 Having carefully considered the proposals, including the submitted Environmental Statement (ES), Townscape and Visual Impact Assessment (TVIA) and Heritage Statement, officers consider that there would cause some harm to the setting of Queen Elisabeth Stadium (Listed, Grade II) and Forty Hall Estate (within the curtilage of the Grade 1 Listed Forty Hall). In both cases, the degree of harm is deemed to be at the lower end of 'less than substantial'. Officers also consider that there would be negligible harm to the setting of Ripaults Factory (Listed, Grade II) and Enfield Technical College (Listed, Grade II). As such, taking account of the Council's statutory duty, the identified harm to heritage assets has been given significant weight in a balancing exercise against public benefit. Officers consider that the public benefits that the scheme would deliver would outweigh the 'less than substantial harm' identified.
- 1.11 The public benefits of the scheme can be summarised as follows:

- Regeneration – environmental, economic and social benefits (outlined below) within one of the most deprived areas (bottom 20% most deprived wards) in England;
- Optimising the site – making effective use of a relatively accessible, low density brown field site for a residential led-mixed use neighbourhood;
- Housing – on a brownfield, low-density use site, providing 444 homes in phase 1 and up to a further 1,356 homes in Phase 2, with a range of types (market for sale, market for rent, low cost rent and intermediate and a range of dwelling sizes and 10% + wheelchair accessible homes;
- Affordable housing – At least 35% affordable housing by habitable room in Phase 1 (38:62 London Affordable Rent: Shared Ownership), resulting in 38 London Affordable Rent and 88 Shared Ownership homes. Phase 2 would also include at least 35% affordable housing by habitable rooms, with the same tenure split. Based on the Illustrative Scheme and indicative dwelling mix, this would provide a further 96 London Affordable Rent and 255 Shared Ownership homes (Indicative overall affordable housing offer is 134 London Affordable Rent and 343 Shared Ownership);
- Jobs – 155 net additional FTE jobs in the construction phase and 140 net additional FTE jobs at the end user phase, with measures to help maximise local employment;
- Creating a piece of town – with well-designed buildings and routes improving pedestrian and cycle connectivity and creating a strong character in an area of poor townscape and connectivity;
- Additional publicly accessible open space – including a new urban piazza (the ‘Heart’) and two parks (the ‘Linear Park’ and ‘Meadows’) for use by occupiers of the area and those working in the nearby retail parks and industrial areas;
- New community facilities – including a children’s nursery and curated events space in Phase 1 and a potential health facility in Phase 2;
- A healthy development – which encourages active lifestyles and active travel, including better links to and through the site and improved connectivity with the surrounding area;
- Improved walking and cycling infrastructure to improve access to buses and Southbury Station and increased capacity of buses and/or improvements to Southbury station;
- Less road traffic - with a significant reduction in trips each day, with associated air quality and other benefits;
- A net increase in biodiversity – incorporating approx. 270 net additional trees, living roofs and walls and other urban greening and other opportunities for wildlife (including bird boxes, bat boxes and ‘insect hotels’); and
- Climate change benefits – an energy efficient development which would achieve ‘zero carbon’ development by connecting to the proposed District Heat Network (or providing on-site Air Source Heat Pumps) and funding off-site off-setting measures, optimisation of Sustainable Urban Drainage Systems and water saving measures and adherence to ‘circular economy’ principles.

1.12 There are relatively few residential neighbours, with all of them being located to the south, between the site and Southbury Road. The siting and massing Blocks A, B and C in Phase 1 would satisfactorily safeguard the amenity of residents in terms of privacy, daylight and sunlight, noise and air quality and improve the outlook from their homes.

- 1.13 The applicants' ambition to meet the target of 80% active and sustainable mode share by 2041, which is in excess of the local targets set for Enfield (69% by 2041), is supported. To achieve this and ensure that the scheme meets London-wide and local priorities in respect of safe, sustainable and active travel there would need to be a range of mitigation measures, secured by planning conditions and s106 planning obligations. These are discussed in detail in section 9.8 and summarised in Section 11.3.
- 1.14 Key environmental considerations can be summarised as follows:
- The site is with Flood Risk Zone 1 and river, surface and water flooding are considered low risk and the proposed basement in Phase 1, Block C, would be set at an acceptable level in terms of ground water flooding;
 - Flood risk is considered acceptable. Following revisions to the proposals and subject to the recommended conditions to reserve detailed design of SuDs features and to manage the use and supply of water, officers consider the water resources flood risk and drainage aspects of the scheme to be acceptable;
 - The proposed scheme has been designed to follow the Mayor of London's energy hierarchy. Energy efficiency measures would reduce energy use. The scheme is designed to connect to a proposed District Heat Network Heat, served by the proposed Edmonton 'energy recovery facility' (a fallback solution, if this did not prove possible, would use on-site Air Source Heat Pumps). The use of photovoltaics would further reduce the scheme's carbon footprint meaning that 'lean', clean' and 'green' measures and carbon offsetting financial contributions would deliver the required carbon dioxide savings. Proposed non-residential space would also meet BREEAM 'Excellent' standards;
 - The scheme would deliver a significant net gain in biodiversity. A package of proposed avoidance and mitigation measures, which are recommended to be secured by condition and s106 planning obligations, mean that the proposals would not give rise to likely significant effects on European designated nature conservation sites, including Epping Forest and the Lee Valley;
 - Subject to the recommended conditions to secure mitigation and further testing, the resultant wind microclimate of Phase 1 would be acceptable and subsequent detailed design of Phase 2 would be informed by microclimate assessments;
 - Proposed waste storage and collection arrangements are acceptable and, subject to conditions requiring Site Waste Management Plans, reuse and recycling of materials during the construction phase would be optimised;
 - There are no particular land contamination issues and standard conditions would ensure safety;
 - Phase 1 would be 'Air Quality Neutral' with regards to building emissions, but not in relation to transport emissions. However, recommended conditions and s106 planning obligations relating to car parking, cycle parking, Electric Vehicle Charging Points etc. would mitigate air quality where possible; and
 - Demolition and construction impacts would be managed by Construction Environmental Management Plans and Construction Logistics Plans and other measures, which are recommended to be secured by condition.
- 1.15 Recommended s106 planning obligations would secure the implementation of an Employment and Skills Strategy that would help ensure that Enfield

residents are able to take advantage of the job opportunities offered by the scheme.

- 1.16 In terms of infrastructure, s106 planning obligations are also recommended to require on-site provision of early-years childcare and secure financial contributions towards creating additional school places to cater for the expected increase in school-aged children. In addition, s106 planning obligations are recommended to secure the delivery of an approved Healthcare Delivery Plan that allows for financial contributions and the possible direct provision of a health facility as part of Phase 2 and financial contributions towards Enfield Playing Fields and Southbury Leisure Centre, to address additional needs for play, sport and leisure.

2.0 RECOMMENDATION

- 2.1 That subject to the completion of a S106 to secure the matters covered in this report and referral of the application to the Mayor of London (Stage 2) and no objection being raised, the Head of Planning / Head of Development Management be authorised to **GRANT** planning permission subject to conditions.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 31/12/2020 or within such extended time as the Head of Planning/Head of Development Management; and
- 2.3 That delegated authority be granted to the Head of Planning or the Head of Development Management to finalise the wording of the s106 obligations and the recommended conditions as set out in this report.

Conditions Phase 1 – ‘Full’ element

- F1. Development to be begun within 3 years
- F2. Development to be in accordance with approved plans
- F3. Hub Business (B1) space (3, 424 sqm GIA) to be used only for office/research and development/light industrial activities E (g (i) (ii) (iii) in Use Classes Order (as amended) (2020)
- F4. Noise attenuation between commercial units in Blocks A, B and C and residential above
- F5. Noise attenuation and ventilation – details of glazing specification and mechanical ventilation arrangements.
- F6. Opening hours of café/restaurant – Blocks A, B & C - 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays)
- F7. Fixed mechanical plant and any associated screening – LBE standard condition
- F8. Ventilation/extraction details – café/restaurant use – Blocks A, B & C.
- F9. BREEAM accreditation (‘Excellent’) for non-residential space in Blocks A, B & C.
- F10. Accessible housing – 55 (12%) of dwellings to be built as ‘wheelchair user’ (M4(3)), with all others being ‘accessible & adaptable’ (M4(2)).
- F11. Compliance with Outline Fire Strategy (February 2020)
- F12. Details of landscaping, public realm, play space and equipment, private amenity space, biodiversity enhancement measures (including

- bat boxes, bird boxes & 'insect hotels'), boundary treatments & wind mitigation measures
- F13. Details of external materials on building by building - Physical samples/mock-ups on site
- F14. Details of all key junctions, apertures and thresholds (including windows, doors, balconies, entrances and where buildings meet the ground).
- F15. Details of all typical façade/elevational treatments
- F16. Details of living roofs & PVs – Blocks A, B & C.
- F17. Provision of cycle parking spaces as set out in approved plans
- F18. Provision of car parking spaces as set out in Transport Assessment/approved plans
- F19. Car Parking Management Plan (including managing disabled parking bays)
- F20. Delivery & Servicing Plan
- F21. Secured by Design
- F22. SuDS details, including rain gardens and filter strips (PRE-COMMENCEMENT) (EXCLUDING DEMOLITION/REMEDIATION)
- F23. Construction Environmental Management Plan (CEMP) (PRE-COMMENCEMENT)
- F24. Non-Road Mobile Machinery (NRMM)(PRE-COMMENCEMENT)
- F25. Non-Road Mobile Machinery (NRMM) (PRE-COMMENCEMENT)
- F26. Construction Logistics Plan (including delivery times) (PRE-COMMENCEMENT)
- F27. Site Waste Management Plan (PRE-COMMENCEMENT)

Conditions – Phase 2 'Outline' element

- O1. Development to be begun no later than 2 years from approval of the last RMA. The last RMA shall be submitted no later than 10 years from date of permission.
- O2. Reserved Matters details
- O3. Outline element to be in accordance with Parameter Plans & Design Code
- O4. Target dwelling mix for Phase 2 as a whole
 - Studio – maximum 5%
 - 1-Bed 2-Person – Maximum 35%
 - 2-Bed 3-Person – Maximum 30%
 - 2-Bed 4-Person – Minimum 20%
 - 3-Bed 4 to 6-Person – Minimum 15%
- O5. RMAs for each Plot to be accompanied by a statement to demonstrate compliance with the following land use requirements (Sqm GEA):
 - Residential Uses (Use Class C3) up to 143,000 sqm; and
 - Flexible Retail & Commercial Uses (Use Classes A1-A4) up to 400 sqm;
 - Office/Workspace (Use Class B1) up to 1,030 sqm;
 - Non-Residential Institutions (Use Class D1) a minimum of 570 sqm (where a Healthcare Delivery Plan approved in relation to a s106 planning obligation requires the provision of a Healthcare Facility); and/or
 - Non-Residential Institutions (Use Class D2) up to 400 sqm.
- O6. RMAs for each Plot to be accompanied by:

- a. Design and Access Statement
 - b. EIA Screening Request
 - c. Cumulative dwelling mix across all Plots
 - d. Cumulative affordable housing across all Plots
 - e. Fire Statement
 - f. Car Parking Management Plan
 - g. Delivery & Servicing Plan
 - h. Wind & Microclimate Assessment
 - i. Daylight and Sunlight Assessment (including Overshadowing).
 - j. Noise Assessment
 - k. BREEAM Pre-assessment
 - l. Fully rendered Accurate Visual Representations
 - m. Details of Living Roofs
 - n. Operational Waste Management Plans
 - o. Overheating Assessments
 - p. Air Quality Neutral Assessment
 - q. Basement Impact Assessment (where basement proposed)
- O7. Business (B1) space to be used only for office/research and development/light industrial activities (g (i) (ii) (iii) in Use Classes Order (as amended) (2020)
 - O8. Accessible housing – at least (10%) of dwellings to be ‘wheelchair user’ (M4(3) and all others to be ‘accessible and adaptable (M4(2)).
 - O9. 1 x public drinking fountain to be provided in public realm
 - O10. Temporary hoarding and landscaping between Plots
 - O11. Secured by Design
 - O12. SUDS strategy (PRE-COMMENCEMENT) (EXCEPT DEMOLITION/REMEDICATION)
 - O13. Construction Environmental Management Plan (CEMP) (PRE-COMMENCEMENT)
 - O14. Non-Road Mobile Machinery (NRMM) (PRE-COMMENCEMENT)
 - O15. Construction Logistics Plan (including delivery times) (PRE-COMMENCEMENT)
 - O16. Site Waste Management Plan (PRE-COMMENCEMENT)

Conditions – Both Phases (All on a building by building/Plot by Plot basis)

- F/O1. CIL Phasing – Phased development for CIL purposes
- F/O2. Water consumption
- F/O3. Replacement if planting dies within 5 years
- F/O4. Land Contamination – Assessment & verification (probably two separate conditions) (PRE-COMMENCEMENT)
- F/O5. Land contamination - Verification
- F/O6. Unexpected contamination (PRE-COMMENCEMENT)
- F/O7. Piling risk assessment and magnetometer survey (PRE-COMMENCEMENT)
- F/O8. Water supply infrastructure – agreement with Thames Water (PRE-COMMENCEMENT).

Informatives

- 1) Co-operation
- 2) CIL liable
- 3) Hours of construction
- 4) Party Wall Act

- 5) Street Numbering
- 6) Sprinklers
- 7) Surface water drainage
- 8) Water pressure
- X) Underground water supply/drainage assets
- 9) Asbestos survey
- 10) Fail Safe Use of Crane and Plant
- 11) Security of Mutual Boundary
- 12) Fencing
- 13) Demolition
- 14) Vibro-impact Machinery
- 15) Scaffolding
- 16) Abnormal Loads
- 17) Cranes
- 18) Encroachment
- 19) Trees, shrubs and landscaping
- 20) Access to railway

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Appendix 1: Scheme drawings and details

3.0 Site and Surroundings

- 3.1 The Site (approx. 4.2 hectares) is on the corner of the Great Cambridge Road (A10) and Southbury Road (A110). It sits within the wider Enfield Retail Park, which extends over Sainsbury’s to the north, to the retail units at Crown Road
- 3.2 The site comprises four separate ‘big-box’ retail and leisure buildings and a large surface car park with very little tree cover.

Table 1: Existing uses

Unit	Occupier	Use Class	Floor Area (sqm) (GIA)
1	B&Q	B8/A1	9,520
2	Buzz Bingo	D2	2,923
3	Dunelm	A1	2,330
4	KFC	A3/A5	280
TOTAL			15,050sqm
Car parking	587 spaces currently in use		

- 3.3 Other ‘big-box’ retail buildings lie to the north, within the Enfield Retail Park. A McDonald’s drive-through and the rear of a Sainsbury’s store and its service

yard lie immediately to the north of Dearsley Road (the northern boundary of Phase 2). The northern boundary of Phase 1 would comprise the existing surface level car park and flank wall of the existing Dunelm retail store.

- 3.4 To the east is the Martinbridge Trading Estate which is designated as a Strategic Industrial Location (“SIL”) and which provides a range of employment opportunities.
- 3.5 Located between the site and Southbury Road to the south is a two-storey storage/office building at No 284 (which has planning permission for a five-storey residential building), Southbury House, a former office building which has been extended and converted into 124 flats and No 288 Southbury Road, a self-contained office building. A large-scale Morrisons supermarket is located to the south on the opposite site of Southbury Road.
- 3.6 To the west, on the other side of the A10 is a large Cineworld Cinema complex and beyond that Southbury Leisure Centre. Kingsmead School sits above Cineworld on the west side of the A10 and beyond that are Enfield Playing Fields. There is a bus standing area on Dearsley Road and bus stops on Baird Road.
- 3.7 A number of cycle routes are nearby, including a dedicated cycle route adjacent to the A10. Bus services run frequently from a number of stops on Southbury Road and Baird Road – the routes served are 313, 307, 317, 191, 121 and 217, and include services to Enfield Town, Barnet, Chingford and Turnpike Lane.
- 3.8 Southbury Station is located approx. 300m to the east, providing Overground services to London Liverpool Street to the south and Cheshunt to the north. Enfield Town Station is approx. 1km to the west, providing services to and from Liverpool Street via Seven Sisters. Ponders End station is approximately 1.8 km away providing services to London Liverpool Street to the south and Hertford East to the north via the interchange at Tottenham Hale.
- 3.9 The following policy designations/characteristics apply to the site:
 - It is part of a designated Retail Park in the North East Enfield AAP;
 - The whole site lies within Important Local View 9 (approach to Enfield Town) and the southern-most part of the site is within View 2 (King’s Head Hill);
 - Land and buildings immediately to the south and east are designated as Strategic Industrial Land (SIL);
 - Enfield Playing Fields is designated as Metropolitan Open Land;
 - The nearest designated heritage assets are the Listed (Grade II) Ripaults Factory and Church of St James (just under 500m to the east);
 - It is within Flood Zone 1;
 - The whole borough is an Air Quality Management Area and the A10/A110 Southbury Road junction is an Air Quality Focus Area; and
 - It has ‘Moderate’ PTAL rating of 3 (although the southern part is expected to have a PTAL of between 3 and 4 by 2031).
- 3.10 The site sits within Southbury Ward, which in 2019 was the 10th most deprived Ward in Enfield and among the 20% most deprived wards in England.

4.0 Proposal

- 4.1 This is a 'hybrid' planning application (part full, part outline) for the redevelopment of the Colosseum Retail Park. The first phase is in 'full' (with all details submitted for approval at this stage) and later phases are in 'outline' (with all matters reserved for subsequent Reserved Matters approval). The elements where 'full' and 'outline' permission is sought is summarised in Table 1 below.
- 4.2 Changes to the Use Classes Order 1987 came in to force on 1 September 2020. The Regulations that introduced the changes require Local Planning Authorities to determine applications that were submitted prior to this date in accordance with the previous use classes. This report therefore refers to the previous use classes throughout.

Table 2: Application scheme summary

Phase	Summary
Phase 1 ('Full')	<p>Number of new homes – 444</p> <p>Commercial & employment-generating uses (5,312sqm) (GIA):</p> <ul style="list-style-type: none"> • Retail (A1/A2/A3/A4) – 1,638 sqm • Business (B1) – 3,424 sqm • Community/leisure (D1/D2) – 250sqm <p>Building heights*:</p> <ul style="list-style-type: none"> • Block A – 29-storeys (126m AOD) • Hub – 6-storeys (54.53m AOD) • Block B – 9-storeys (56.95m AOD) • Block C – 18-storeys (88.95m AOD) • 24.6m AOD ground level • <p>Public realm (7,500sqm), including all footpaths, public spaces and incorporating a new public square.</p> <p>Residential car parking – 110 spaces (0.25 car parking/unit)</p> <p>Cycle parking (771 long-stay and 67 short-stay)</p>
Land in both Phase 1 & Phase 2	<p>Two areas are in both Phase 1 and Phase 2:</p> <ul style="list-style-type: none"> • Temporary surface car park on eastern edge of Phase 1 (this area accommodates parts of an access road and Plots E & F in Phase 2) • Temporary landscape strip and surface car parking on northern edge of Phase 1 (this area accommodates access road in Phase 2) • The temporary residential car parking for Phase 1 (that is re-provided as part of the Phase 2 development) would be re-provided and relocated across the site to reach a total provision of 0.2 spaces per dwelling for Phase 2 and maintain an Intend to Publish London Plan policy compliant level of disabled car parking provision.

Phase	Summary
Phase 2 'Outline'	<p>Residential space – 143,00sqm (GEA)</p> <p>Flexible commercial, leisure & employment-generating uses – up to 1,600 sqm (sqm GEA):</p> <ul style="list-style-type: none"> • Retail (A1/A2/A3/A4) – up to 400sqm • Business (B1) – up to 1,030sqm • Community (D1) – minimum of 570sqm Healthcare Facility (where required by an approved Healthcare Delivery Plan) • Leisure (D2) up to 400sqm <p>Maximum building height* parameters:</p> <ul style="list-style-type: none"> • Plot D – 89.95m AOD • Plot E – 75.70m AOD • Plot F – 50.10m AOD • Plot G – 111.85m AOD • Plot H – 79.95m AOD • Plot J – 88.75m AOD • 24.6m AOD ground level <p>Public realm approx. 15,475sqm, including all footpaths, public spaces and the following parks:</p> <ul style="list-style-type: none"> • Linear Park (approx. 2,500sqm) • Meadows (approx. 1,000sqm) <p>Car parking</p> <ul style="list-style-type: none"> • Residential - 0.2 car parking/unit <p>Cycle parking – in accordance with Intend to Publish London Plan standards</p>

- 4.3 Parameter Plans and a Design Code are submitted for approval in relation to the 'outline' element and these would represent 'control documents' which subsequent Reserved Matters Applications (RMAs) would need to comply with. The applicants have submitted an illustrative masterplan showing one way that the 'outline' element could be built out in accordance with the proposed Parameter Plans and Design Code. Based on an indicative dwelling mix, this would include 1,143 new homes (i.e. 1,587 across both phases). NB The applicants have tested a reasonable 'worst case' scenario of 1,800 homes (in total across both phases) for the purpose of assessing technical impacts.
- 4.4 The applicants intend to deliver an approved scheme over a series of delivery phases, as set out in indicative phasing in Table 2. Taking account of commercial considerations, including the likely timescale for securing vacant possession of the various plots, the applicants' have asked that conditions attached to a planning permission allow for the 'outline' element to be delivered up to 12 years from the date of a permission. Officers consider that this is reasonable, on the basis that the 'full' element of the scheme starts within three years from the date of a permission.
- 4.5 The application was submitted in March 2020 and follows extensive pre-application discussions, in line with best practice and as recommended in the

NPPF. This process included meetings and workshops with officers, independent design review by the Enfield Design Review Panel (August 2018 and March 2019), presentation to Planning Committee at pre-application and application stages (November 2018 and July 2020), stakeholder engagement and public consultation and engagement.

- 4.6 The application scheme has been revised and additional supporting information provided in response to discussions with officers, comments from consultees and the Mayor of London's Stage 1 Report.

Table 3: Proposed phasing (number of homes based on illustrative scheme)

Planning Phase	Delivery Phase	Plot/ Occupant	Block	Homes	Start Date	Duration (months)
1	1	B&Q	A, B, C	444	June-22	32
2	2	Buzz Bingo	D	167	June-24	24
	3	Dunelm	E, F	263	Aug-26	27
	4	KFC	G, H	450	Nov-28	36
	5		J	263	Jan-33	27

5.0 Environmental Impact Assessment

- 5.1 The planning application represents EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and is accompanied by an Environmental Statement (ES).
- 5.2 Regulation 3 prohibits the council from granting planning permission without consideration of the 'environmental information' that comprises the ES, including any further information submitted following request(s) under Regulation 25 and any other information, any representations made by consultation bodies or by any other person about the environmental effects of the proposed development.
- 5.3 The ES considers the likely significant effects of the proposed development, as well as the likely significant cumulative effects that may result from the proposed development and other developments in the area. The topics addressed in the ES are:
- Introduction
 - Approach to EIA
 - Description of the Site and Study Area
 - The Proposed scheme
 - Consideration of Alternatives
 - Transport and Traffic
 - Air Quality
 - Noise and Vibration
 - Wind
 - Daylight and Sunlight
 - Townscape and Visual
 - Ground Conditions and Contamination
 - Socio-economics and Human Health
 - Cumulative Effects Assessment
 - Summary of ES and Mitigation Schedule

- 5.4 The Council appointed AECOM to independently examine the ES and in May 2020 it prepared the 'Colosseum Retail Park Environmental Statement Review', which identified a number of requests for clarifications. The Review did not identify any need for formal requests for further information in accordance with Regulation 25 of the EIA Regulations. In August 2020, the applicants submitted a 'Response to AECOM's Review of the ES' (July 2020). AECOM has reviewed this and in September 2020 prepared an RS Review – Post Turley Response document. This accepts the majority of clarifications. A small number of residual issues remain and the applicants have come back again on these. Officers are satisfied that the ES, as clarified, provides a good account of the applicants' assessment of likely significant environmental effects.
- 5.5 The findings of the ES, including as clarified, are discussed in the body of this report as necessary and any adverse environmental effects have been identified. If planning permission were to be granted, mitigation measures, where possible, could be secured by planning conditions and/or planning obligations as appropriate and these are identified in the report.

6.0 Relevant Planning Decisions

- 6.1 The existing retail park was built-out in accordance with permissions that were granted in May and December 1995. There have been various permissions for changes of use/development since, including permission for the drive-through McDonalds in June 2012.
- 6.2 P14/01265/PRJ and 16/00110/FUL
In May 2014, approval was granted for the conversion of Southbury House (280-286 Southbury Road) into 115 studio apartments. In July 2016, retrospective permission was granted for the creation of nine additional flats, involving first, second and third floor extension and a three-storey infill extension.
- 6.3 19/02124/SCOP
In September 2019, the Council issued an EIA Scoping Opinion in relation to the proposed development. It also provided further advice on the scope and content of the ES in December 2019.
- 6.4 19/03484/FUL
In December 2019, planning permission was granted for the redevelopment of the substation Brickfield House at No. 284 Southbury Road (adjacent to the site) for the erection of a 5-storey building to provide 5 x self-contained flats with vehicle and cycle parking.
- 6.5 20/00778/PRJ
In April 2020, Prior Approval was granted for the change of use of the office building at Nos. 292-308 Southbury Road (to the east of Baird Road) to residential (C3) to provide 63 flats.

7.0 Consultations

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

Paragraph 5.3.6 goes on to state:

“In the case of ‘significant applications’, additional consultation will be carried out depending upon the proposal and site circumstances: Developers will be encouraged to provide the community with information and updates on large scale or phased developments using websites, public exhibitions and newsletters”

Applicants’ consultation

- 7.2 The applicants’ submitted Statement of Community Involvement (SCI) explains who, how and when they consulted individuals and organisations at the pre-application stage, as they were developing the application scheme. This sets out a programme of engagement which began in summer 2018 and included ward councillors, Enfield Design Review Panel, existing tenants of Colosseum Retail Park, local residents, community groups (including Enfield Road Watch, the Enfield Society and CPRE London) and business groups (including North London Chamber of Commerce and Enterprise Enfield). Amongst other activity the engagement programme included:
- Two public exhibitions held in November 2018 and July 2019 at Southbury Leisure Centre;
 - Attendance at the June 2019 Turkish Cypriot Cultural Festival; and
 - A dedicated website which allowed visitors to leave their comments.
- 7.3 The applicants’ SCI sets out who responded, the issues that were raised and how the applications scheme responds to these issues.

Public Consultation

- 7.4 Initial consultation on the application involved notification letters being sent to 1,340 neighbouring properties on 20 March 2020 (giving people 28-days to respond), a press advert in the Enfield Independent on 15 April 2020 (giving people 14 days to respond) and 4 site notices on 16 April 2020 (giving people 21 days to respond).
- 7.5 Following receipt of revisions and supplementary information, a further round of consultation was undertaken on the application. This comprised sending letters to the same neighbouring properties on 31 July 2020, 4 site notices on 3 August and a press advert in the Enfield Independent on 5 August 2020. The letter, site notices and press advert all gave people at least 30 days to comment.
- 7.6 The Council number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:
- Number of representations objecting received: 17);
 - Number of representations in received in support: None; and
 - Number of neutral representations received: None.

- 7.7 Objections

Table 4: Summary of Reasons for Comment

Affect local ecology	7
Close to adjoining properties	3
Development too high	15
General dislike of proposal	9
Inadequate access	3
Inadequate parking provision	8
Inadequate public transport provisions	6
Increase in traffic	11
Increase of pollution	10
Loss of light	4
Loss of parking	5
Loss of privacy	5
More open space needed on development	7
Noise nuisance	6
Out of keeping with character of area	6
Over development	9
Strain on existing community facilities	9
Information missing from plans	1
Not enough information given in application	1

7.8 Material public comments are listed below:

- 14 of the 16 objections raise concern about the proposed height of the proposed buildings (issues raised include: a failed model, only successful in affluent areas where space standards are generous and construction quality is high, two-storeys would be more appropriate, low-rise houses for families is what is needed, concern at risk of fire given the Grenfell tragedy, ugly buildings, high-rise contributes to anti-social behaviour, low income families being trapped in unsuitable accommodation, inability of emergency services to reach the 29 floor of a building, the Council has recently demolished tower blocks – it makes no sense to approve more, overlooking of school playground and classrooms opposite and of local streets, impact on Local Views 2 and 9)
- Loss of existing shops and Buzz Bingo (Issues raised include: shops used by local people, Buzz Bingo provides a gathering/social meeting place for local residents, people will have to drive further to get to DIY store, loss of jobs)
- Over development/too dense (Issues raised: lack of information in application, already too much development proposed in the area – including Meridian Water, poor noise and air quality environment for residents, inadequate public transport accessibility for proposed density, could be contributing to not enough affordable housing, concern at appropriates during future lockdowns – lessons from COVID-19 pandemic)
- Insufficient car parking (unrealistic to expect residents not to have a car, already loss of on-street car parking due to new cycle lane on Southbury Road, would need confidence that new residents would be unable to park on local roads)
- Traffic levels on the A10 are already unacceptable, fear this will be worse, congestion happens when there is a problem on the M25, pedestrian safety is a concern given the need to cross the A10 to get to local amenities, accident hot spot, need a safer solution to ensure safe connectivity between the site and the surrounding area)

- PTAL 3 should not be described as 'moderate', Southbury Station too small to cope with increased use, investment in the future is unlikely given TfL's current financial problems
- Concern that existing schools, nurseries, doctor surgeries, dentists, hospital A&E would not be able to cope with extra children, need much better understanding on likely effects
- Insufficient amount of affordable housing (below 40%) and concern that shared ownership is not affordable to the vast majority of those who need affordable housing as it is heavily skewed towards Shared Ownership;
- Proposals would not provide the type of homes Enfield needs, skewed towards small flats, not enough family-sized homes
- Concern at proximity of housing to a very busy, polluted main road.
- Proposed open space would be mainly 'hard', insufficient amount of open space on site, most open space not delivered until Phase 2 with a risk that it may not happen, delivered in an improved Enfield Playing Fields would be on the other side of the A10, proposal would result in increase in deficit of public park provision in Southbury ward, additional impact on Epping Forest Special Area of Conservation;
- Concern at additional pollution for George Spicer and Kingsmead Schools and worsening air quality; and
- Concerns at overlooking of Kingsmead School playground;
- A large number of flats would have no private amenity space and many would be single-aspect (so prone to overheating and ventilation issues).

7.9 One of the local objectors has sent a link to an on-line petition which, at the time of finalising this report, had attracted 271 'signatures', objecting to the proposed scheme. It should be noted that some people that have signed live outside the borough and there may be multiple signatories from some households. The grounds of objection are as follows:

- In the wake of the tragic Grenfell disaster how can any council defend the plan to build to 29 floor tower block when our amazing emergency services still lack the basic equipment to reach such heights?
- Recently Enfield Council has demolished a number of tower blocks within the borough and replaced with low level housing. How can they justify then relocating these enormous towers to a different town within the same borough?
- Overlooking/Loss of privacy and child protection: This development is directly opposite a large secondary school and will overlook the playgrounds and classrooms. The surrounding residential roads in the local proximity will also be overlooked directly by the tower block.
- Loss of light: there is no building of this scale, i.e. above ~6 floors, within the entire Enfield Town area. The construction of 29, 18 and 9 storeys will impact the light across the previously mentioned school, residential areas.
- Visual amenity: as previously stated this development is on a scale in excess of anything in a vast surrounding area.
- Highway Safety/Local Air Quality: This development is situated directly on the A10, at a stretch of the road that is often 4 lanes of stationary traffic in both directions, both at weekends and during week days.
- Congestion and Environment Air Quality: The development is situated directly at the junction of the A10/Southbury Road. In addition to the A10 congestion, Southbury Road is often at a standstill in both directions. The addition of the huge residential development will only add further to the congestion on this essential artery for crossing the A10.

- Local Air Quality/Congestion: Enfield Councils recent, seemingly uncontrolled residential development within the Enfield Town area, has brought the town to a standstill with a road network failing to cope with the existing volume of traffic. Has anyone attempted to move east - west across the town, or vice versa, during rush hour/school run times? Enfield is almost at a standstill with congestion and the associated pollution from hundreds of cars sitting in traffic jams.
- Visual Amenity: This tower block development will dwarf any other structure in the entire area and does not fit with the aesthetics of the town. Enfield truly was a historic market town that has long since lost its character with the recent uncontrolled residential development of every area of available land. This development will further erode any semblance of character remaining in the town.
- Local infrastructure: the schools are struggling to cope with the demand for places, doctors' surgeries are over run, dental practices are oversubscribed, one local A&E has been closed and the closest A&E at North Middlesex Hospital cannot cope with demand. Rather than further expansion of the residential base, in an already over populated location, where are the plans for new schools, doctors, dentists etc, etc, etc. The council may quote the recently opened Wren Academy school but the Enfield Planning Department will have already filled that school with the recent development at the Chase farm site!
- Within Enfield we are rather spoilt for access to green space. However, these areas are increasingly congested with people enjoying them. I assume the requirement to provide green space for new developments will rely on the existing areas to meet that need.

7.10 An objection has been received from Buzz Bingo, the current occupier of Unit 2 within the Retail Park (site), on the following grounds:

- The proposed scheme would result in the loss of a well utilised bingo club with c. 11,500 active customers, which is an important component of the social infrastructure provision of Enfield;
- National, regional and local planning policy advocates the protection of social/cultural infrastructure and where loss is proposed, realistic proposals for re-provision or replacement are required. There is no evidence of this and so the proposals are contrary to policy;
- Local authorities have a public sector equality duty under the Equality Act 210 to take account of the potential impacts of their decision-making on groups with protected characteristics. In the absence of alternative provision or replacement of the bingo club, it is considered that the proposed development could disproportionately, adversely impact parts of the community that rely on the bingo hall as a social outlet, namely older people (56-years plus) and women; and
- If, despite these objections, the Council is minded to grant planning permission, Buzz Bingo would welcome the opportunity to discuss opportunities to relocate to an alternative, suitable premises in the Borough.

7.11 There have been no letter/emails of support

7.12 The following local groups/societies made representations:

7.13 Bush Hill Park Residents' Association (summary)
Object to the application on the following grounds:

- Affect local ecology, development too high, general dislike of proposal, Inadequate access, Inadequate parking provision, Inadequate public transport provisions, increase in traffic, Increase of pollution, Loss of privacy, more open space needed on development, noise nuisance, out of keeping with character of area, over development and strain on existing community facilities;
- There is no coherent policy regarding tall buildings. This allows developers “carte blanche” to quote precedent of development;
- Agree that this a “brown field” site which would significantly benefit from a well-planned residential development;
- “Lock down” has reinforced the need for Gentle Density. People are looking for space and greenery, not high rise. Where this does not take place, it is clearly reflected in mental health. The proposed development goes against this;
- The Grenfell Tower catastrophe showed that Emergency Services cannot deal with fires over a certain height, so we are again surprised that large monolithic buildings are being considered; and
- Residents will have little car parking space so will be reliant on Transport Public links. There are no reliable train services from nearby stations.
- There are still issues around infrastructure, particularly schools, health provision and a mix of shops.

7.14 Enfield Town Residents’ Association (summary)

Object to the application on the following grounds:

- ETRA opposes this development. High-rise living is a discredited approach to planning that is inflicted on those who have little choice by those who would never choose to live in their creations;
- If this development goes ahead it will almost inevitably result in severe negative impacts on health, antisocial behaviour and crime; in the longer term it will bring increased costs for Enfield in terms of dealing with those problems. While it might resolve some housing issues in the short-term, in the longer-term the predictable health impacts are likely to lead to further exacerbation of existing health inequalities across the borough when our aim should be on their reduction;
- It is a disgrace that a local authority with a Socialist administration is considering inflicting this failed policy of high-rise housing on those who are lowest down the housing ladder and least likely to have any choice. In fact, given the Leader’s background in health inequalities we are surprised she has not already vetoed this submission;
- Furthermore, the known additional costs for maintenance of such buildings are likely to lead to significant increases in rents charged for these flats; if they end up being used for social housing and/or to temporarily house homeless people then they are likely to end up being a very expensive option indeed, as these charges will be passed on to the council; and
- Lastly, scientific evidence emerging from efforts to stem the spread of COVID-19 indicates that this type of situation, where people have little option other than to share lifts and common areas with multiple others, facilitates the transmission of viral aerosols. Given the current situation, attention to minimising the risks of viral infection must surely be a key consideration in all future design and planning decisions. This design must be abandoned.

7.15 Enfield Road Watch, The Enfield Society and CPRE-London (joint representations) (summary)

Qualified support for the proposals on the following grounds:

- The A10 corridor could generate thousands of new homes, a vibrant new mixed-use community and regenerate nearby deprived areas;
- We support densification in this area on the basis that it is more sustainable than building in the Green Belt;
- We are pleased that there is a build-to-rent component and suggest that this could be increased to create more diversity in the housing market;
- We understand the need for some high-rise buildings to create the necessary density while allowing for open public spaces, but some members do not support such tall buildings, particularly Block A;
- If the Council is minded to permit high-rise then there should be a clear zoning policy for tall buildings in Enfield, including how tall they can be and where they can be built. Tall buildings on the A10 may not have a particularly negative visual impact on the wider borough, but current proposals for tall buildings elsewhere in the borough would;
- We would advocate mid-rise development wherever and whenever possible (more appropriate for human-scale living);
- We support the intention to re-open east-west connections and to link the development to the greenspace across the A10.
- We support the several strategies to move towards car-free with interim parking that can be re-purposed at a future date;
- We are pleased that the developer is also providing a vision for reorganising and intensifying the adjacent SIL land; and
- The Council should continue wider-area planning to the east of the rail line to link with Ponders End and not confine it to the A10 corridor alone.

Our organisations have had separate discussions with TfL about the need for a more frequent train service on the Southbury Overground line and the potential for regeneration that a more frequent service could unlock. We have been disappointed with TfL's response and urge the Council and NEAT to continue to bring pressure to bear on TfL in this matter.

Sainsbury's and Morrison's sites may be next in line to be offered for redevelopment and we urge the Council to develop an overall masterplan before that process starts in consultation with adjacent landowners.

7.16 Enfield Ignatians Rugby Football Club:

- New design standards required post COVID 19 pandemic to promote healthy/active lifestyles;
- Proposed scheme inadequately addresses the need to provide open space/sports facilities (proposed financial contribution to Enfield Playing Fields are inadequate);
- Additional pressures on the Playing Fields present health and safety issues (e.g. infections from dog waste);
- The Council should master plan the wider area to set a framework to secure contributions from this and other proposed developments – to help the applicants fulfil their place-making objectives and avoid burdening the Council and the Club with additional demands; and
- The Club is reviewing existing facilities on the Playing Fields and developing a vision for an Enfield Sports Village.

Statutory and Non-Statutory Consultees

Internal

- 7.17 Economic Development: No comments received.
- 7.18 Education: The Education team's comments are incorporated in the main body of the report (Paras. 9.16.6 to 9.16.12)
- 7.19 HASC Health: No comments received.
- 7.20 Housing: The Director of Housing comments are incorporated in the main body of the report (Section 9.3).
- 7.21 Parks: The Leisure team response is incorporated in the main body of the report (Paras. 9.16.21 to 9.16.25).
- 7.22 Regeneration, Leisure and Culture: The Leisure team response is incorporated in the main body of the report (Paras. 9.16.21 to 9.16.25).
- 7.23 SUDS/Flooding Drainage: Following discussions with the applicants and the submission of SuDS Design Note 28 July 2020, no objection, subject to conditions requiring the submission of details for approval.
- 7.24 Traffic & Transportation: The Transport team's response is incorporated in the main body of the report (Section 9.8).
- 7.25 Waste Management: No comments on the proposals.

External

- 7.26 Energetik: The energy company established by the Council raises no objections – discussions are on-going over the proposed connection of the development to an extended energy network.
- 7.27 Enfield Clinical Commissioning Group (CCG) – Detailed comments on the submitted Health Facilities Impact Assessment and proposed mitigation of impacts on primary health care facilities (discussed in Paras. 9.16.17 to 9.16.20).
- 7.28 Enfield's Design Review Panel (DRP): An emerging scheme was presented to DRP twice at pre-application stage (August 2018 and March 2019). The conclusions from the March 2019 DRP and officer commentary are set out in Paras. 9.4.4 and 9.4.5.
- 7.29 Enfield Disablement Association: No comments received.
- 7.30 Environment Agency: No objection but recommend that the applicant considers risk to groundwater in line with advice provided. Additional comments on Sustainable drainage systems and underground storage tanks.
- 7.31 Historic England: Not necessary for this application to be notified to Historic England under the relevant statutory provisions. No comment.

7.32 Historic England (Greater London Archaeological Advisory Service (GLAAS): No comments received.

7.33 London Fire Brigade: Advises the applicant to ensure the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector. Strong recommendation that sprinklers are considered for new developments.

7.34 Mayor of London (Stage I response) (summary):

- *Principle of development:* The proposed optimisation of the site and the contribution to Enfield's housing targets is supported. The scheme proposes a substantial quantum of town centre uses in an out-of-centre location which has been justified on the basis that no suitable or available sites within or adjacent to Enfield town centre could accommodate the development and the proposal represents no threat to town centre investment. While the proposed community uses (nursery and health centre) are supported, overall, the scheme results in the loss of social infrastructure, which must be further addressed.
- *Affordable housing:* 35% affordable housing (by habitable room) comprising a 70/30 tenure split in favour of intermediate housing is proposed across both the detailed and outline proposals. The scheme is not eligible for the Fast- Track Route as the Borough does not support the tenure; a viability appraisal has been provided for assessment by Council and GLA officers. The S106 agreement must secure Built to Rents units in a covenant for at least 15 years; subject to a clawback mechanism in the event the covenant is broken.
- *Design:* The form, massing and layout strategy is broadly supported with an appropriate distribution of heights to form streets and public spaces. Permeability and connections to areas outside the development should be explored further and justified. The architecture is good quality; the detail of the outline scheme should be secured within the design code. The proposal will result in less than substantial harm to nearby designated heritage assets, which could be outweighed by public benefits, subject to resolution of the viability and affordable housing position.
- *Play space:* Justification is required in respect of why play space requirements for older children cannot be achieved on-site. Any agreed off-site play provision should be detailed and secured. The provision of high-quality equipment, and safety measures, should be secured by the Council within both the detailed and outline phases. Early delivery of play space should be secured by the Council for the outline element of the scheme and the applicant should demonstrate that the play space proposals are not segregated by tenure.
- *Energy:* Further information is required in respect of a number of elements of the energy strategy. Detailed technical energy comments have been circulated to the Council under a separate cover to be addressed in their entirety.
- *Sustainable drainage and water efficiency:* Further consideration should be had to water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.
- *Urban greening:* Opportunities for further enhancement to improve the Urban Greening Factor should be reviewed, including features such as

additional green roofs across all available roof space, green walls (the area of which for UGF is calculated by length x height), and additional areas of planting.

- *Transport:* A revised trip generation assessment should be provided and contributions to public transport enhancement should be agreed based on the revised trip generation assessment. Walking and cycling wayfinding to local destinations should be provided. A zebra crossing outside Southbury station should be provided and the carriageway narrowed to ensure low vehicle speeds. Financial contributions should be secured in respect of cycling improvements along Southbury Road should be secured and changing the signalling of the crossing at the junction of A10 Great Cambridge Road and A110 Southbury Road to reduce wait times for walking.

- 7.35 Metropolitan Police Designing Out Crime Service: The Service has met with the design team and has no objection, subject to the inclusion of a Secured by Design condition to ensure that crime prevention becomes an integral part of the proposals.
- 7.36 Natural England: An earlier objection due to the lack of information on impacts on designated sites has been withdrawn following the negotiation of avoidance and mitigation measures. Natural England recommend that the Council undertakes an appropriate assessment of the proposal in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended) (discussed in Paras. 9.11.1 to 9.11.9).
- 7.37 NHS London Healthy Urban Development Unit: Detailed comments on the submitted Health Facilities Impact Assessment and proposed mitigation of impacts on primary health care facilities (discussed in Paras. 9.16.17 to 9.16.20).
- 7.38 Sport England: The proposed mitigation measures would not fully alleviate the impact and objects to the proposed scheme. Detailed comments on addressing sports needs arising from the proposed scheme and ensuring that the scheme itself responds to the Sport England Active Design criteria (discussed in Paras.9.16.21 to 9.16.25).
- 7.39 Thames Water Authority: No objections, subject to following sequential approach to discharging of surface water. No need for a condition in relation to foul water drainage. Requests a condition in relation to water supply infrastructure and an informative with regards to underground water assets.
- 7.40 Transport for London: Detailed transport comments in addition to the Mayor of London's Stage I Report. These are addressed in the body of the report (Section 9.8).

8.0 Policy

The London Plan 2016

- 8.1 The published London Plan is the Mayor of London's spatial strategy for London as a whole. The following policies are considered particularly relevant:

Policy 2.6: Outer London: vision and strategy

Policy 2.7: Outer London: economy
Policy 2.8: Outer London: transport
Policy 2.14: Areas for regeneration
Policy 3.1: Ensuring equal life chances for all
Policy 3.2: Improving health and addressing health inequalities
Policy 3.3: Increasing housing supply
Policy 3.4: Optimising housing potential
Policy 3.5: Quality and design of housing developments
Policy 3.6: Children and young people's play and informal recreation facilities
Policy 3.7: Large residential developments
Policy 3.8: Housing choice
Policy 3.9: Mixed and balanced communities
Policy 3.10: Definition of Affordable Housing
Policy 3.11: Affordable housing targets
Policy 3.12: Negotiating affordable housing on individual private residential and mixed-use schemes
Policy 3.13: Affordable Housing thresholds.
Policy 3.14: Existing housing
Policy 3.15: Co-ordination of housing development and investment.
Policy 3.16: Protection and enhancement of social infrastructure
Policy 3.17: Health and social care facilities
Policy 3.18: Education facilities
Policy 3.19: Sports facilities
Policy 4.1: Developing London's economy
Policy 4.12: Improving opportunities for all
Policy 5.1: Climate change mitigation
Policy 5.2: Minimising carbon dioxide emissions
Policy 5.3: Sustainable design and construction
Policy 5.5: Decentralised energy networks
Policy 5.6: Decentralised energy in development proposals
Policy 5.7: Renewable energy
Policy 5.9: Overheating and cooling
Policy 5.10: Urban greening
Policy 5.11: Green roofs and development site environs
Policy 5.12: Flood risk management
Policy 5.13: Sustainable drainage
Policy 5.15: Water use and supplies
Policy 5.18: Construction, excavation and demolition waste
Policy 5.21: Contaminated land
Policy 6.9: Cycling
Policy 6.10: Walking
Policy 6.12: Road network capacity
Policy 6.13: Parking
Policy 7.1: Lifetime neighbourhoods
Policy 7.2: An inclusive environment
Policy 7.3: Designing out crime
Policy 7.4: Local character
Policy 7.5: Public realm
Policy 7.6: Architecture
Policy 7.7: Location and design of tall and large buildings
Policy 7.14: Improving air quality
Policy 7.15: Reducing noise and enhancing soundscapes
Policy 7.18: Protecting local open space and addressing local deficiency
Policy 7.19: Biodiversity and access to nature

Policy 7.21: Trees and woodlands

Intend to Publish London Plan

- 8.2 Following an Examination in Public into the submission version of the Plan and modifications, in December 2019 the Mayor published his Intend to Publish London Plan. On 13 March 2020, the Secretary of State issued Directions to change a number of proposed policies.
- 8.3 In line with paragraph 48 of the NPPF, the weight attached to this Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF. Whilst the published London Plan (2016) remains part of Enfield's Development Plan, given the advanced stage that the Intend to Publish version has reached, significant weight can be attached to it in the determination of planning applications (although there is greater uncertainty about those draft policies that are subject to the Secretary of State's Direction). The following policies are considered particularly relevant (those identified by (*) are the subject of the Direction).

:

- GG2: Making the best use of land
- D2: Infrastructure Requirements for Sustainable Densities
- D3: Optimising site capacity through the design-led approach (*):
Optimising site capacity through the design-led approach – sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations;
- D4: Delivering good design
- D5: Inclusive design
- D6: Housing Quality and Standards: *Introduces a stronger policy on housing standards including minimum space standards.*
- D7: Accessible Housing
- D8: Public Realm
- D9: Tall buildings: *Sets out that boroughs should identify locations (including identifying where tall buildings may be an appropriate form of development subject to meeting other requirements of the plan); impacts (visual, functional, environmental and cumulative); and incorporate free to enter publicly-accessible areas*
- D11: Safety, security and resilience to emergency
- D12: Fire Safety
- D14: Noise
- E3: Affordable workspace
- E11: Skills and opportunities for all
- H1: Increasing Housing Supply (*):
- H4: Delivering Affordable Housing
- H10: Housing Size Mix (*)
- HC1: Heritage conservation and growth
- GG1: Building Strong and Inclusive Communities
- GG2: Making the Best Use of Land
- GG3: Creating a Healthy City
- GG4: Delivering the Homes Londoners Need
- G1: Green Infrastructure
- G5: Urban Greening
- G6: Biodiversity and access to nature
- G7: Trees and woodlands

- S4: Play and Informal Recreation
- SI1: Improving air quality
- SI2: Minimising Greenhouse Gas Emissions
- SI3: Energy Infrastructure
- SI5: Water infrastructure
- SI6: Digital connectivity infrastructure
- SI7: Reducing waste and supporting the circular economy
- SI12: Flood risk management
- SI13: Sustainable drainage
- T1: Strategic approach to transport
- T2: Healthy Streets
- T3: Transport capacity, connectivity and safeguarding
- T4: Assessing and mitigating transport impacts
- T5: Cycling
- T6: Car Parking
- T9: Funding transport infrastructure through planning

Local Plan - Overview

- 8.4 Enfield's Local Plan comprises the Core Strategy, Development Management Document, Policies Map and (in relation to this site) the North East Enfield Area Action Plan. Together with the published London Plan, it forms the statutory 'development plan' for the borough and sets out planning policies to steer development according to the level it aligns with the NPPF.

Local Plan – Core Strategy

- 8.5 The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the borough is sustainable. The following Local Plan Core Strategy policies are considered particularly relevant:

- Core Policy 1: Strategic growth areas
- Core Policy 2: Housing supply and locations for new homes
- Core Policy 3: Affordable housing
- Core Policy 4: Housing quality
- Core Policy 5: Housing types
- Core Policy 6: Housing need
- Core Policy 8: Education
- Core Policy 9: Supporting Community Cohesion
- Core Policy 20: Sustainable Energy use and energy infrastructure
- Core Policy 21: Delivering sustainable water supply, drainage and sewerage infrastructure
- Core Policy 24: The road network
- Core Policy 25: Pedestrians and cyclists
- Core Policy 26: Public transport
- Core Policy 28: Managing flood risk through development
- Core Policy 29: Flood management infrastructure
- Core Policy 30: Maintaining and improving the quality of the built and open environment
- Core Policy 31: Built and landscape heritage

Core Policy 32:	Pollution
Core Policy 34:	Parks, playing fields and other open spaces
Core Policy 36:	Biodiversity

Local Plan - Development Management Document

8.6 The Council's Development Management Document (DMD) provides further detail and standard based policies by which planning applications should be determined. Policies in the DMD support the delivery of the Core Strategy. The following Local Plan DMD policies are considered particularly relevant:

DMD1:	Affordable Housing on Sites Capable of Providing 10 units or more
DMD3:	Providing a Mix of Different Sized Homes
DMD6:	Residential Character
DMD8:	General Standards for New Residential Development
DMD9:	Amenity Space
DMD10:	Distancing
DMD 37:	Achieving High Quality and Design-Led Development
DMD 38:	Design Process
DMD 42:	Design of civic/public buildings and institutions
DMD 43:	Tall Buildings
DMD45:	Parking Standards and Layout
DMD47:	New Road, Access and Servicing
DMD48:	Transport Assessments
DMD49:	Sustainable Design and Construction Statements
DMD50:	Environmental Assessments Method
DMD51:	Energy Efficiency Standards
DMD 52:	Decentralized energy networks
DMD53:	Low and Zero Carbon Technology
DMD55:	Use of Roofspace/ Vertical Surfaces
DMD57:	Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
DMD58:	Water Efficiency
DMD59:	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 watercourses and flood defences
DMD64:	Pollution Control and Assessment
DMD65:	Air Quality
DMD 66:	Land contamination and instability
DMD68:	Noise
DMD69:	Light Pollution
DMD 70:	Water Quality
DMD 71:	Protection and enhancement of open space
DMD 72:	Open Space Provision
DMD 73:	Child Play Space
DMD 76:	Wildlife corridors
DMD 77:	Green chains
DMD 78:	Nature conservation
DMD79:	Ecological Enhancements
DMD80:	Trees on development sites
DMD81:	Landscaping

Local Plan – North East Enfield Area Action Plan

8.7 The North East Enfield Area Action Plan (NEEAP) provides area-based policies for this part of the borough. The following Local Plan DMD policies are considered particularly relevant:

- 4.1: Encouraging modal shift
- 4.2: Improving the quality of the pedestrian and cycling environment
- 4.13: Improving bus services
- 4.14: Design of road network
- 5.1: Affordable housing
- 5.2: Mix of housing types
- 5.3: Improving the public realm
- 7.1: Providing community facilities
- 8.2: Providing new open space
- 8.4: Encouraging local food growing
- 9.1: Sustainable energy
- 16.1: Southbury Station area

Enfield Draft New Local Plan

8.8 Work on a New Enfield Local Plan has commenced so the Council can proactively plan for appropriate sustainable growth, in line with the Mayor of London's "good growth" agenda, up to 2041. The Enfield New Local Plan will establish the planning framework that can take the Council beyond projected levels of growth alongside key infrastructure investment.

8.9 The Council consulted on Enfield Towards a New Local Plan 2036 "Issues and Options" (Regulation 18) (December 2018) in 2018/19. This document represented a direction of travel and the draft policies within it will be shaped through feedback from key stakeholders. As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging growth strategy identifies the eastern corridor, where the site is located, as a potential option for a key location for growth. The Issues and Options document states that there is significant opportunity for comprehensive intensification of retail parks, such as the Colosseum Retail Park.

National Planning Policy Framework (February 2019)

8.10 The National Planning Policy Framework (NPPF) sets out national planning policy objectives. It introduces a presumption in favour of sustainable development, which is identified as having three dimensions - an economic role, a social role and an environmental role. Other key relevant policy objectives are referred to as appropriate in this report.

Other Material Considerations

8.11 The following guidance is also considered particularly relevant:

- Enfield Heritage Strategy 2019-2024 SPD (2019)
- Enfield S106 SPD (2016)
- Enfield Decentralised Energy Network Technical Specification SPD (2015)

- Enfield Characterisation Study (2011)
- Forty Hill Conservation Area Character Appraisal (2015)
- Forty Hill Conservation Area Management Proposals (2015)
- Forty Hall Park Management Plan (2007-2022)
- Forty Hall and Estate Conservation Management Plan (2007)
- The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017) London Councils: Air Quality and Planning Guidance (2007)
- TfL London Cycle Design Standards (2014)
- GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
- GLA: Housing SPG (2016)
- GLA: Social Infrastructure SPG (2015)
- GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
- GLA: London Sustainable Design and Construction SPG (2014)
- GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
- GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
- Mayor’s Transport Strategy (2018)
- Healthy Streets for London (2017)
- Manual for Streets 1 & 2, Inclusive Mobility (2005)
- National Design Guide

9.0 Material Planning Considerations

9.1 The main planning issues raised by the proposed scheme are considered to be:

1. Principle of Development (Land Use);
2. Housing Need and Delivery;
3. Design;
4. Residential Quality and Amenity;
5. Heritage;
6. Neighbouring Amenity;
7. Transport;
8. Water Resources, Flood Risk and Drainage;
9. Climate Change;
10. Biodiversity;
11. Wind Microclimate;
12. Waste Storage;
13. Contaminated Land;
14. Air Quality; and
15. Socio-economics and Health.

9.2 Principle of Development

9.2.1 The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise.

9.2.2 Running alongside this is the presumption in favour of sustainable development that is at the heart of the NPPF (paragraph 11). The NPPF (paragraph 118) also advocates the promotion and support the development

of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.

9.2.3 North East Enfield Area Action Plan (NEAAP) Policy 6.3 envisages physical improvements only to the existing Enfield Retail Park to create a better approach for pedestrians, cyclists and users of public transport and improve the pedestrian experience within the park. Accordingly, the Policies Map (2016) designates the site as forming part of the Retail Park. However, it should be noted that there are no development plan policies that seek to retain out-of-centre retail or leisure uses. Indeed, planning policy at all levels incorporate a ‘town centre first’ approach and directs such uses to designated town centres.

9.2.4 The fact that the NEAAP does not anticipate redevelopment for other uses does not mean that redevelopment is unacceptable. The need to support London’s town centres and the need for housing has increased since the NEAAP was adopted. In response, Intend to Publish London Plan Policies SD7 and H1 call for the mixed-use redevelopment of car parks and low-density retail parks and supermarkets.

9.2.5 The submitted Design and Access Statement sets out the applicants’ assessment of the site and its context and considers a wider study area that includes a corridor of retail parks and industrial estates between the Great Cambridge Road (A10) in the west and the railway line and Southbury Station in the east. It sees the proposed scheme as a catalyst for wider change.

9.2.6 Whilst of limited weight, it should be noted that the Council’s emerging Local Plan (Regulation 18 Issues and Options consultation document) states that there are significant opportunities to look at comprehensive intensification of retail parks, with the Colosseum Retail Park being explicitly referred to.

a) Comprehensive Redevelopment

9.2.7 The scheme proposes the redevelopment of the site, including the demolition of the existing low-density ‘big box’ retail and leisure buildings. The existing buildings that occupy the site have no architectural merit and detract from the appearance of the area. As such the principle of comprehensive demolition is considered acceptable, subject to appropriate replacement development and conditions to manage adverse impacts during demolition and construction work.

9.2.8 Table 5 below summarises the proposed phased comprehensive development of the site, including the non-residential uses and floorspace that would be lost and the non-residential uses and floorspace that would be gained.

Table 5: Change in non-residential uses by Planning Phase

Phase	Existing & Proposed Non-residential Uses	Quantum	Use Class
Phase 1	<i>Demolition of B&Q</i>	-9,520sqm (GIA)	A1
	Flexible retail floorspace (convenience)	441sqm (GIA)	A1
	Flexible retail floorspace	584sqm	A1

	(comparison)	(GIA)	
	Flexible retail floorspace (food and beverage)	614sqm (GIA)	A3/A4
	Office floorspace	3,424sqm (GIA)	B1
	Non-residential floorspace (intended for a creche)	250sqm (GIA)	D1/D2
	Net change		-4,208sqm
Phase 2 (various delivery phases)	<i>Demolition of Dunelm</i>	-2,330sqm (GIA)	A1
	<i>Demolition of Buzz Bingo</i>	-2,923sqm (GIA)	D2
	<i>Demolition of KFC</i>	-280sqm (GIA)	A3/A5
	Flexible non-residential floorspace (including up to 1,030sqm of B1, and a minimum of 570sqm for a medical centre)	1,600sqm (GEA)	A1-A4, B1, D1 and/or D2
	Net change		- 3,930*

* Some mixing of GIA and GEA floorspace, so not entirely accurate

b) *Loss of existing retail and other uses and proposed retail and other uses*

9.2.9 As referred to above, a 'town centre first' principle runs through all levels of planning policy, directing significant retail and leisure uses to locate in town centres. This includes NPPF (paragraphs 86 and 87), published London Plan Policy 2.15 and Intend to Publish London Plan Policies SD6, SD7 and SD8, Core Strategy Policy 17 and DMD Policy 25. Given this, the proposed phased loss of existing retail uses is considered acceptable in principle.

9.2.10 Indeed, the sequential approach to the location of new non-residential 'main town centre uses' contained in the NPPF and development plan policies referred to above means that the onus is on the applicant to justify the proposed non-residential uses. Indeed, DMD Policy 251iii states that "*New development within the boundary of the Council's existing retail parks ... and outside of the town centres will only be permitted if the applicant can demonstrate to the Council's satisfaction that a sequential test has been applied which shows no suitable sites available within or on the edge of the town centres detailed in part i. of this policy.*"

9.2.11 The applicants' submitted Town Centre Uses Assessment concludes that there are no suitable or available in-centre and edge-of-centre sites (within or adjacent to Enfield Town Centre) that could accommodate the proposed development. It goes on to note that the proposed scheme is location-specific, and in taking account of the existing retail and other uses, the proposed town centre uses are key elements of a development that is intrinsically linked to the creation of a new, high-density mixed-use neighbourhood.

9.2.12 Once the sequential test is satisfied, an assessment of the impact on town centres is required. The applicants' Town Centre Uses Assessment finds that Enfield Town Centre is currently performing well and acts primarily as a comparison goods retail destination, with an important convenience goods

and service role. It goes on to conclude that the impact of the proposed scheme (in terms of trade draw) to Enfield Town Centre is low (-0.6% in 2034) and would not harm its vitality and viability. Officers agree with the applicants' sequential and impact test findings.

c) Loss of existing and proposed new community/social infrastructure

- 9.2.13 The NPPF (para. 92) notes that planning decisions should not result in the unnecessary loss of valued facilities and services that provide social, recreational and cultural facilities and services. Published London Plan Policy 3.16 and Intend to Publish London Plan Policies SD6 and S1 resist the loss of social infrastructure, without re-provision, and require suitable additional infrastructure to support growth.
- 9.2.14 Core Policy 7 makes clear that the Council will work with partners to deliver appropriate proposals for new health and social care facilities (prioritising the east of the borough). Core Policy 9 supports community cohesion by, amongst other things, securing access to good quality health care and other social facilities in locations that best serve the community. Core Policy 11 seeks to protect existing leisure/cultural facilities, unless it can be demonstrated that they are no longer required or will be provided elsewhere and encourages specific types of facilities for which current demand has been identified, including a bingo hall. DMD Policy 17 resists the loss of existing community facilities unless a suitable replacement is provided, or evidence can demonstrate a lack of need.
- 9.2.15 The proposed scheme would result in the loss of the existing Buzz Bingo and The Slots Room unit (2,920sqm GIA) facility. The Mayor of London Stage 1 Report calls for further justification in respect of the loss of the bingo hall in relation to the (local) community need, noting that bingo halls can provide a place of social inclusion for elderly persons or vulnerable groups. The loss of the bingo hall has been raised by the current operators, Buzz Bingo, and one local person.
- 9.2.16 Buzz Bingo has recently re-opened following closure during the COVID-19 pandemic. It is advertised as being open seven days per week (10.00am to midnight), has a licenced bar and an electronic gaming slot machine area. It is open to over18's only. Buzz Bingo has confirmed that the weekly bingo schedule comprises 41 bingo sessions, as set out below, with attendance greater in the evenings and at the weekend and overall weekly attendance being in the order of 2,420 people. The company also state that, in a typical 12-month period, almost 11,500 unique customers attend the Club, making it one of the most successful of Buzz Bingo clubs nationally. The weekly schedule is as follows:
- Breakfast Bingo – 10.30-11.30 Monday-Saturday
 - Lunch Club – 12.00 to 13.00 Daily (Monday-Sunday)
 - Afternoon Main Event – 13.15-14.45 Daily (Monday-Sunday)
 - Big Bite Bingo – 18.00-18.45 Daily (Monday-Sunday)
 - Evening Main Event – 19.00-21.00 Daily (Monday-Sunday)
 - Late Night Bingo – From 21.15 Daily (Monday-Sunday)
- 9.2.17 There are no other known commercial bingo halls in the borough and the nearest alternative commercial bingo hall is currently Mecca, at Wood Green (with Buzz also currently operating in Ilford and Boreham Wood).

- 9.2.18 The proposed scheme would result in the net loss of D2 (now *sui generis* use), although Phase 1 would include 250 sqm (GIA) of D1 or D2 (now *sui generis* or Use Class E or F2, depending on the use) (earmarked as a creche/children's nursery). Phase 2 would include at least 570 sqm (GEA) D1 floorspace (now Use Class E) (earmarked as a medical centre), and up to 400 sqm (GEA) of Use Class D2 (see above). The proposed children and health facilities are discussed in detail in Section 9.16.
- 9.2.19 The proposed events space in Phase 1 is intended to have a year-round events programme, to be managed by a site curator who would shape content, collaborating with local residents, and ensuring a balanced and successful programme to cater for all members of the community. In addition, the proposed 'community café' in Phase 1, overlooking the events space and linked to the work hub, would provide flexible space that would be capable of being hired by the local community.
- 9.2.20 The applicants maintain that the inclusion of a large commercial leisure use would be inconsistent with their objective of creating a high-quality residential-led mixed-use scheme and would not accord with the town centre policies discussed above. They also stress that, rather than an exclusive facility that is only open to some, the proposed scheme would deliver a more inclusive mix of community socialising opportunities. Officers agree that the re-provision of a large leisure use would not optimise the development of this site and consider that such facilities should be located in the borough's town centres (in accordance with spatial planning policy objectives) – noting that emerging schemes for Enfield Town and Edmonton Green could provide opportunities to include a commercial leisure use. The Buzz Bingo facility is located in Phase 2 and the applicants are currently not expected to demolish the building until June 2024, allowing time for Buzz Bingo or another commercial bingo operator, to open up in a town centre. Given this, officers consider that the loss of Buzz Bingo is acceptable, as an exception to the adopted and emerging policies relating to social infrastructure/community facilities referred to above.
- 9.2.21 The Mayor of London Stage 1 Report also refers to published London Plan Policy 3.1 and Intend to Publish London Plan Policy GG1, which highlight the importance of building inclusive communities and notes that bingo halls can provide a place of social inclusion for elderly persons or vulnerable groups. In its objection to the proposed scheme, Buzz Bingo also highlight that the loss of the facility, without its replacement, could have disproportionate adverse impact on parts of the community that rely on the bingo hall as a social outlet, namely older people and women. This issue is addressed in the Equalities Statement in Section 10 of this report.

d) Proposed new business uses

- 9.2.22 The proposed employment floorspace is also subject to the sequential and impact tests, by virtue of Intend to Publish London Plan Policy E1 and Policy DMD25. The conclusion reached by the Town Centre Uses Assessment for the retail uses equally applies to the office floorspace. There is demand for flexible office uses at the Site, and the proposed scheme is not considered to conflict with Core Strategy Policy 17.

9.2.23 Intend to Publish London Plan Policy E1 calls for new employment schemes to provide a range of suitable workspaces including lower cost and affordable workspace and Intend to Publish London Plan Policy E2 encourages larger schemes, greater than 2,500sqm (GEA), to provide a proportion of flexible workspace or smaller units suitable for micro and Small and Medium Enterprises (SMEs).

9.2.24 Intend to Publish London Plan E3 makes clear that affordable workspace (at rents maintained below market rate) may be secured in defined circumstances, namely:

- Where there is affordable workspace on-site currently;
- In areas identified in a Local Plan where cost pressures could lead to the loss of affordable or low-cost workspace; and/or
- In locations identified in Local Plans where the provision of affordable workspace would be necessary or desirable to sustain mix of business or culture uses.

9.2.25 Phase 1 would include a 'work hub' building providing 3,424 sqm (GIA) of B1 floorspace, designed to be used as flexible workspace, as opposed to being let to a single occupier, which can accommodate a wide range of tenants including individuals and/or small- to medium-enterprises. The proposed shared workspace model for the Hub is specifically aimed at local micro enterprises and SMEs. The applicants intend that this would be operated by an independent workspace provider who would be offering workspace at market rents appropriate for the local market.

9.2.26 Officers welcome the inclusion of the work hub in the scheme as a way of maintaining employment on the site and helping to create a mixed and vibrant place and are satisfied that the building and servicing arrangements are fit for purpose. The applicants maintain that the location of the Hub within outer London would, by nature of its geography and the local market, be affordable for these target organisations and to further reduce the rent levels in this location would threaten the viability of the work hub as a proposition to workspace providers, thereby lessening its attractiveness as a business opportunity. Given that there is no existing affordable workspace on site and the absence of a specific Local Plan policy, officers do not consider that the Council can insist on affordable workspace.

9.2.27 The inclusion in Phase 2 of up to 1,030sqm (GIA) of additional B1 space, subject to market demand, is acceptable in principle and again could help create a mixed and vibrant place.

9.2.28 Given the recent changes to the Use Class Order (1987), which create the new broader 'Class E', it is recommended that conditions restrict the use of the floorspace identified a Business B1 space to office, research and development and light industrial purposes, to prevent such space being converted in to retail space.

d) Proposed housing

9.2.29 Published London Plan Policy 3.3 stresses the need to realise brownfield housing capacity and Intend to Publish London Plan Policies SD7 and H1 call for mixed-use redevelopment of car parks and low-density retail parks and supermarkets. The Council's Core Strategy (4.1 Spatial Strategy), identifies

sustainable locations for development would be concentrated in town centres, on previously developed land and that new homes will be planned through the intensification of land uses. The pressing need for housing is discussed in detail below under the Housing Need and Delivery heading.

- 9.2.30 This is an accessible brown field site in relatively low density use and whilst there are a number of environmental constraints that make incorporating high-quality housing a challenge (including high levels of noise and poor air quality associated with the A10), the principle of housing as part of a residential-led mixed-use development is acceptable. Having said this, it is important that in accordance with Intend to Publish London Plan Policy D13 (Agent of Change), published London Plan Policies 2.17 and 6.2, Intend to Publish London Plan Policy E5 and T3 and Core Strategy Policy 14 that new housing is located and designed such that it safeguards adjoining Strategic Industrial Land (allowing businesses to operate on a 24-hour 7-day per week basis) and on-street bus standing areas.

Summary of Principle of Development

- 8.2.31 Intend to Publish London Plan Policies SD7 and H1 call for the mixed-use redevelopment of car parks and low-density retail parks and supermarkets. The existing buildings that occupy the site have no architectural merit and detract for the appearance of the area. The phased comprehensive redevelopment of the site is acceptable in principle. Development plan policies enshrine a strong 'town centre first' principle and the loss of the existing retail and leisure uses is acceptable. The loss of the existing leisure use (Buzz Bingo) is also acceptable, although it is acknowledged that the loss of this use would have a differential impact on older women, that needs to be mitigated. The proposed new business use is welcomed and would help ensure that there would be a net increase in jobs on the site, despite the significant net reduction in non-residential uses. This is an accessible brown field site in relatively low density use and whilst high noise levels and poor air quality raise particular challenges, a housing-led mixed-use scheme is acceptable in principle.
- 8.2.32 There has been some local concern that the proposal would mean that people would need to drive further to DIY and other stores. However, the strong policy objectives of focusing retail uses in town centres where public transport connectivity is high justifies the loss of big-box retail space.

9.3 Housing Need and Delivery

- 9.3.1 Published London Plan Policy 3.3 sets a 10-year target (2015-2025) for the provision of 423,887 new homes across London (42,389 per year), with a 10-year target for Enfield being 7,976 (798 homes a year). This target is set to increase, with Intend to Publish London Plan Policy H1 setting a 10-year London target (2019/20-2028/29) of 522,870 for London as a whole and 12,460 (or 1,246 per year) for Enfield.
- 9.3.2 Enfield Housing's Trajectory Report 2019 shows that during the preceding 7-years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with only 51% of approvals over the preceding 3-years actually being implemented.

- 9.3.3 The Council's Local Plan Issues & Options (Regulation 18) document (November 2018) acknowledges the sheer scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the emerging London Plan targets for the borough.
- 9.3.4 Enfield is a celebrated green borough with close to 40% of the land is currently designated Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. These land designations underpin the need to optimise development on brownfield land.

Proposed housing in Phases 1 and 2

- 9.3.5 Whilst the amount and mix of homes in Phase 1 is specific and known (444 homes at a particular mix based on detailed drawings), the amount of housing proposed for Phase 2 is less certain. The 'outline' Phase 2 element of the application is for a maximum amount of residential floorspace (143,000sqm) (GEA). The applicants have undertaken technical assessments based on a 'reasonable worst case' scenario of 1,800 homes and therefore the 'outline' element of the proposed scheme could provide up to a maximum of 1,356 homes, subject to future Reserved Matters Applications being in accordance with the proposed Parameter Plans and Design Code and meeting all necessary technical criteria. The Illustrative Scheme for Phase 2 is based on approx. 121,000sqm (GEA) of residential floorspace and assumes 1,143 units based on an indicative mix that accords with proposed dwelling mix parameters (set out below). Based on this, Phases 1 and 2 together would deliver 1,587 homes. The Illustrative Scheme forms the basis for viability testing.
- 9.3.6 Whilst the Illustrative Scheme figure of 1,587 has been used for viability testing, the 'reasonable worst case' scenario of 1,800 homes across both phases has been assumed for all other technical assessments, including EIA. Each Reserved Matters Application (RMA) for a Plot in Phase 2 would be subject to an EIA Screening. In the event that any RMA was proposing an amount of housing that took the overall amount of housing for the site above 1,800, the future EIA process would need to determine how and what additional assessments would be required to demonstrate acceptability in EIA terms and what, if any, additional mitigation would be necessary to make it acceptable. It is recommended that a planning condition requires an EIA Screening request to accompany RMAs for each Plot in Phase 2.

Density

- 9.3.7 The NPPF (Para.122) states that, in respect of density, consideration should be given to whether a place is well designed and 'the desirability of maintaining an area's prevailing character and setting...or of promoting regeneration and change'.
- 9.3.8 Published London Plan Policy 3.4 requires development to 'optimise' housing output taking account of public transport accessibility, local context and character and design principles and for proposals which compromise this policy to be resisted. The site has an Urban character and a forecast PTAL of 3/4. For such sites, the current density matrix provides an indicative density of 200-450 habitable rooms per hectare (hr/ha) or 70 to 170 units per hectare

(u/ha), for schemes with 2.7-3.0hr/unit – although Policy 3.4 makes clear that the matrix should not be applied mechanistically.

- 9.3.9 The Intend to Publish London Plan incorporates a different approach to assessing density. Emerging Policy D3 makes clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites, with no use of a density matrix as a guide. Policy D3 states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.
- 9.3.10 Local Plan Core Policies 4 and 30 stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Local Plan Policy DMD 37 calls for a design-led approach to 'capitalising' on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity.
- 9.3.11 Based on the Illustrative Scheme with its indicative land use and dwelling mix (i.e. 1,587 units and a total of 4,052 habitable rooms), the scheme would have the following density:
- Phase 1 – 261u/ha, 633hr/ha
 - Phase 2 – 457u/ha, 1,190hr/ha
 - Overall – 378u/ha, 965hr/ha
- 9.3.12 Given the significant weight that can be attached to Intend to Publish Policies D2 and D3, officers consider that the 'design-led' approach should be used to assess the acceptability of the proposed density. The proposed scheme exceeds 350u/ha, which is the definition of 'higher density' development in the emerging London Plan. It is, therefore, particularly important that physical, social and green infrastructure issues are fully considered. The following issues are assessed in different sections of this report:
- Form and Layout - Section Paras. 9.4.1 to 9.4.27;
 - Experience – (safety, security, inclusive design, housing quality and residential amenity) – Paras. 9.4.28, 9.4.68 to 9.4.72 and Section 9.5;
 - Quality and character – Section 9.4;
 - Transport infrastructure – Section 9.8;
 - Green infrastructure– Paras. 9.4.20 to 9.4.27; and
 - Social infrastructure – (child care, school places, health care facilities and sport and leisure facilities - Section 9.16.
- 9.3.13 In summary, the assessment in the above sections finds the proposed scheme to be acceptable, subject to securing necessary mitigation and officers are satisfied that the proposed amount of development does optimise its potential to deliver new housing and jobs as part of a new higher density mixed-use neighbourhood.

Build to Rent

- 9.3.14 Published London Plan Policy 3.8 provides support for Private Rented Schemes/Build to Rent. Intend to Publish London Plan Policy H11 supports

the provision of Build to Rent housing and the justifying text for this policy encourages boroughs to take a positive approach to the sector to enable it to better contribute to the delivery of new homes. In doing so, it sets out a number of criteria for what can qualify as Right to Buy (discussed below). The Mayor of London's Housing and Viability SPG (2017) provides specific guidance on viability issues associated with Build to Rent.

- 9.3.15 The adopted Enfield Local Plan does not contain policies on Built to Rent, which is a relatively new type of housing that post-dates the Core Strategy (adopted in 2010) and the DMD (adopted in 2014). However, the Council's Issues and Options document (November 2018) signals an intention to include a policy that support Build to Rent in its emerging new Local Plan.
- 9.3.16 Phase 1 includes 197 homes in a Build to Rent in Block A. Table 6 below sets out the criteria required by Intend to Publish London Plan Policy H11 and how the proposed Build to Rent block in Phase 1 would meet these criteria. The applicants also highlight the potential for Phase 2 to include further purpose-built Build to Rent housing.

Table 6: Phase 1 Build to Rent & policy criteria

Intend to Publish London Plan Policy H11 criteria	Compliance
At least 50 homes	Yes (197)
Homes are held as Build to Rent under a minimum 15-year covenant	Yes – subject to s106 planning obligations
Clawback clause in place that ensures there is no financial incentive to break the covenant	
All units self-contained & let separately	
Unified management & ownership of the homes	
Tenancies of 3-years+ are available to all	
Rent & service charge certainty for the length of the tenancy	
On-site management	
Complaints procedure to be in place	
No up-front charges/fees.	

- 9.3.17 The proposed Build to Rent housing (Block A) includes communal internal and external amenity space and suitably sized self-contained flats served by three lifts. Subject to securing the above by s106 planning obligations, officers consider that the proposed housing and would add to housing choice in this part of the borough.

Affordable Housing

- 9.3.18 Paragraph 62 of the revised NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required. Published London Plan Policy 3.12 states that Boroughs should seek the 'maximum reasonable amount' of affordable housing having regard to affordable housing targets, and the need to encourage rather than restrain residential development.
- 9.3.19 Intend to Publish London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Intend to Publish London Plan Policy H6 identifies criteria whereby applications can follow the 'fast track route' set out in the Mayor's Affordable Housing and

Viability SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review.

- 9.3.20 Intend to Publish London Plan Policy H7 and the Mayor's SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and share ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority and the GLA.
- 9.3.21 Local Plan Core Policy 3 sets of a borough-wide affordable housing target of 40% of units on all sites capable of accommodating 10 or more dwellings, aiming for a housing tenure mix ratio of 70% Social Rented and 30% Intermediate provision. Local Plan Policy DMD1 repeats Core Strategy policy objectives. It goes on to make clear that any negotiations will take into account the specific nature of the site; development viability; the need to achieve more mixed and balanced communities; particular priority to secure affordable family homes which meet both local and strategic needs; available funding resources; and evidence on housing need. It also states that mixed tenure residential development proposals must be designed to be 'tenure blind', so that the scheme as a whole is well integrated, cohesive and complementary and that tenure should be spread throughout the development to prevent concentrations or clear distinctions.
- 9.3.22 Local Plan NEAAP Policy 5.1 states that new residential development should provide a minimum of 40% affordable housing in accordance with Core Strategy Policy 3. However, it goes on to state that given the viability issues of sites within North East Enfield, the Council will take a flexible approach to tenure in order to support the delivery of new affordable homes, with the target being 60% social rented/affordable rent; and 40% intermediate.
- 9.3.23 The need for affordable and especially for social housing remains high in the borough, which is evidenced in the draft Enfield Strategic Housing Market Assessment (SHMA) (2015).
- 9.3.24 The Council's 2020-2030 Housing and Growth Strategy clearly notes the Borough's ambition to 'develop more homes that are genuinely affordable to local people, so that more people can live in a home where they spend a more reasonable proportion of their household income on housing costs'.
- 9.3.25 In 2016/17, 30% of housing completions were affordable, whilst in 2017/18 this decreased further to 7% of housing completions being affordable, amounting to 37 units in total being delivered. These figures show that the target 40% affordable housing by unit is not currently being met.
- 9.3.26 Phase 1 – Amount and type of affordable housing. The proposed type and location of affordable housing in Phase 1 is set out in Table 7 below. It should be noted that the applicants are not proposing to include a form of affordable housing, such as Discounted Market Rent, within the Build to Rent element of the scheme. Whilst this means that the Build to Rent element would be exclusively Market housing, this approach does maximise the amount of London Affordable Rent, the Council's priority form of affordable housing, and Shared Ownership.

9.3.27 The proposed distribution of housing tenures across Phase 1 is set out in Table 7 below.

Table 7: Phase 1: Indicative tenure distribution

Block	Tenure	Homes	Hab rooms	
A1	Market - Build to Rent	197	419	
A2	Shared Ownership	63	178	
B1	London Affordable Rent	38	121	
B2	Shared Ownership	10	37	
B3	Shared Ownership	15	46	
C1	Market – for sale	121	275	
Overall				
Overall	Market - Build to Rent	197	419	
	Market for sale	121	275	
	London Affordable Rent	38	126 (28%)	382 (35.5%)
	Shared Ownership	88	121 (32%)	261 (68%)
	Total	444	1,076	

9.3.28 Phase 2 – amount and type of affordable housing. There are no detailed proposals for affordable housing for the ‘outline’ element of the scheme at this stage. The intention is that this could be provided on a plot-by-plot basis, allowing for the possibility of up to 100% affordable housing on any particular Plot. Based on the Illustrative Scheme, indicative dwelling mix and proposed 35% by habitable room (32:68 London Affordable Rent: Shared Ownership), Phase 2 would provide 349 London Affordable Rent habitable rooms (equivalent to 96 homes) and 735 Shared Ownership habitable rooms (equivalent to 255 homes). It is recommended that s106 planning obligations require a tenure split of at least 32:68 London Affordable Rent: Shared Ownership, with the aim of achieving a target of 60:40 London Affordable Rent: Shared Ownership, subject to viability at Early, Mid and Late Stage Review.

9.3.29 Overall – amount and type of affordable housing. Based on the Illustrative Scheme, indicative dwelling mix, proposed 35.5% by habitable room and a 32:68 London Affordable Rent: Shared Ownership split, the total amount of affordable housing across both phases would be 477 homes (134 London Affordable Rent and 343 Shared Ownership homes). The proposed amount of affordable housing has increased from the earlier pre-app proposal of 28% by habitable room. The absolute number of affordable homes would increase if the amount of housing in Phase 2 was to be greater than in the Illustrative Scheme (i.e. greater than 1,143 homes).

9.3.30 Affordable housing dwelling mix. The proposed affordable housing dwelling mix is addressed in paras. 9.3.44 to 9.3.48 below. This is considered acceptable, given the need to be flexible, as recognised in Local Plan Policy DM1.

9.3.31 Integration. Phase 1 has been designed to be ‘tenure blind’ and there is no discernible difference in external appearance of housing in different tenures, other than the different architectural character of Blocks A, B and C. Likewise, the Design Code that will govern the detailed design of Plots in Phase 2 provides the same area-wide and plot specific guidance for all forms of

housing. This is welcomed and accords with Local Plan Policy DM1. It is recommended that s106 planning obligations ensure that all related communal open space and play space is available to all residents (irrespective of tenure).

- 9.3.32 Affordability. For housing to be considered 'affordable', annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40% of a household's net income.
- 9.3.33 *London Affordable Rent* is a form of Affordable Rent, for legal and regulatory purposes, but whereas nationally the cap on Affordable Rent is no more than 80% of market rent, the Mayor of London does not consider 80% market rent to be genuinely affordable in most parts of London.
- 9.3.34 The starting point for London Affordable Rent is benchmarks which reflect the national formula rent cap for social rents, uprated by the Consumer Price Index (CPI) for September 2016 plus 1%. These benchmarks are updated each year in line with CPI plus 1% and updated benchmarks are published by the GLA, although providers have the flexibility to charge less than the benchmark. Whilst London Affordable Rents tend to be slightly more expensive across London than Social Rents (which Local Plan policies refer to), with the difference being smaller for larger bedroom units, the Mayor of London still considers them genuinely affordable to low income households reliant on welfare income. They also require less subsidy than Social Rent homes and therefore support the delivery of more affordable housing overall. The weekly London Affordable Rents would be 1-Bed - £159.12, 2-Bed £168.67 and 3-Bed - £178.15 (2020/21 levels).
- 9.3.35 *Shared Ownership*. The GLA Stage 1 Report advises that the Mayor's preference is for intermediate shared ownership products to be secured as affordable to a range of incomes below the upper limit of £90,000 per annum and benchmarked against the monitoring figure of £56,200 per annum in the London Plan Annual Monitoring Report.
- 9.3.36 The Phase 1 Intermediate Housing is proposed to be Shared Ownership with a minimum of 25% share on equity and rental on the unsold equity of up to 2.75%. Taking account of assumed monthly mortgage, rent and service charges and other assumptions, the applicants' Financial Viability Appraisal sets out the following indicative minimum household annual incomes (assuming housing costs are no more than 1/3 of gross household income) as being required to access the proposed Shared Ownership as follows:
- 1-Bed 2 Person - £32,000;
 - 2-Bed 3 Person - £39,750;
 - 2-Bed 4 Person - £45,250; and
 - 3-Bed 5 Person - £49,250.
- 9.3.37 However, it should be noted that Shared Ownership would not be limited to the above annual income range and households with annual incomes of up to £90,000 would be eligible to access the proposed Shared Ownership homes.
- 9.3.38 Viability Assessment. The Council instructed Deloitte Real Estate to review the applicants' Financial Viability Appraisal (FVA). This assumes that grant of £28,000 per affordable unit is secured. Deloitte challenged a number of

assumptions and inputs in to the financial appraisal of the scheme. In response, the applicants made a number of adjustments. However, in its report to the Council (July 2020), Deloitte concludes that “it is our opinion that the scheme as presented, even taking account of value adjustments, is unviable and does not provide sufficient profit to meet an appropriate Minimum Developers Return.” The applicants have taken a commercial view that they could close the deficit based on a range of sales, costs and other factors. Deloitte has also scrutinised a more recent appraisal by the applicants to establish the Benchmark Cost and Benchmark Gross Development Value and found these to be within a reasonable range.

9.3.39 Viability Reviews. As the proposed level of affordable housing provision does not meet all the requirements of Intend to Publish London Plan Policy H5, an Early Stage review (if a permission is not implemented within 2-years) and a Late Stage review (prior to 75% of private residential units being sold/let) would be required. Given the phased nature of the scheme and the proposed 12-year life of the permission, in addition to securing Early and Late Stage Reviews, it is recommended that S106 planning obligations also secure a Mid Stage Review prior to submission of RMAs for the first Plot in Phase 2. These reviews would ensure that the ‘maximum reasonable amount’ of affordable housing is delivered.

9.3.40 Council option to purchase. The applicants have offered the Council a “first option” in being able to purchase the proposed London Affordable Rent homes in Phase 1. The terms of this offer would need to be agreed, but essentially the principle is that the Council would be given a priority option to buy these homes at the minimum values assumed in the applicants’ Financial Viability Appraisal taking account of assumed grant, £229 per sqft, index linked to the CPI. It is recommended that this is secured by s106 planning obligations.

Dwelling mix

9.3.41 The published London Plan policy states that new developments should “offer a range of housing choices in terms of the mix of housing sizes and types” (Policy 3.8Ba). The Intend to Publish London Plan H10 is similar, but also refers to the need for local evidence.

9.3.42 Local Plan Policy DMD3 states that a mix of different sized homes should be provided in line with the targets in Core Policy 5, as follows:

- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45%, 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons); and
- Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons).

9.3.43 Local Plan Policy NEEAAP Policy 5.2 calls for a mix of housing types in accordance with Core Policy 5 and intermediate housing that should prioritise family units. Enfield’s most recent draft Strategic Housing Market Assessment (SHMA) (2015) identifies a specific need in the borough for 50% of affordable rented and market housing respectively to be homes with at least three bedrooms suitable for families. This figure is supported further by Enfield’s Local Housing Register which indicates a demand of 47.3% for family sized homes for affordable and social rented housing.

9.3.44 All of the proposed homes in both phases would be flats. The proposed dwelling mix for Phase 1 is set out below

Table 8: Dwelling Mix: Phase 1

	Market		Shared Ownership		London Affordable Rent		Total	
Studio	60	19%	0	0%	0	0%	60	14%
1B-2P	156	49%	27	31%	8	21%	191	43%
2B-3P	79	25%	11	13%	8	21%	98	22%
2B-4P	7	2%	26	30%	7	18%	40	9%
3B-4P	0	0%	0	0%	7	18%	7	2%
3B-5P	16	5%	22	25%	8	21%	46	10%
3b-6P	0	0%	2	2%	0	0%	2	0.5%
	318	100%	88	100%	38	100%	444	100%

9.3.45 The proposed mix for Phase 1 would be heavily weighted towards 1-bed homes, with a relatively high overall percentage of studio homes (14%), and only 12% overall would be 'family' homes' (although this would be 66% for the London Affordable Rent units). This reflects the applicants' desire to 'kick start' the development by including a Build to Rent component which is typically more focused towards smaller-sized units.

9.3.46 The dwelling mix for housing on Plots in Phase 2 would be determined at Reserved Matters stage. However, the applicants are proposing the overall target dwelling mix set out in Table 9 below. This would cover all proposed housing tenures and the dwelling mix of different tenures could vary to take account of housing need and market demand. The proposed overall target dwelling mix for Phase 2 would limit the number of studio flats and require a minimum of 35% family-sized homes across all tenures.

Table 9: Target dwelling mix Phase 2

Dwelling type	Minimum or maximum amount	
Studio	Max. 5%	Min. 35%
1B-2P	Max. 35%	
2B-3P	Max. 30%	
2B-4P	Min. 20%	
3B-4 to 6P	Min. 15%	

9.3.47 The proposed dwelling mix would be contrary to that required by Policy DMD3 and this is acknowledged. However, paragraph 2.2.4 of the DMD recognises there may be instances where it is not feasible or desirable to achieve the targets. The applicants' Financial Viability Appraisal notes that larger units in Phase 1 have been focussed in the proposed affordable housing to meet priority needs, there is a growing need for smaller affordable home ownership and the introduction of a higher proportion of larger units would result in a less efficient scheme, constraining viability and the amount of affordable housing.

9.3.48 On balance, each case has to be assessed on its individual merits and whilst the proposed non-compliant mix for Phase 1 is noted, officers consider that the overall dwelling mix across the scheme as a whole would be acceptable, with significant weight being given to the scheme viability and emphasis on family homes within the proposed affordable housing. It is recommended that

the applicants' proposed overall target dwelling mix for Phase 2 is secured by planning condition (allowing for some variation on individual Plots, but compliance with target mix across the Phase).

Summary of Housing Need and Delivery

- 9.3.49 There is a pressing need for housing, including affordable housing, in Enfield and London as a whole and Enfield has a challenging 10-year housing delivery target. Given the nature of the proposed scheme, the overall number of homes is uncertain at this stage but would be likely to deliver between 1,587 and 1,800 homes.
- 9.3.50 Based on the Illustrative Scheme (1,587 homes), indicative dwelling mix and proposed 35% by habitable room (32:68 London Affordable Rent: Shared Ownership), the total amount of affordable housing across both phases would be 477 homes (134 London Affordable Rent and 343 Shared Ownership homes). This would amount to 30% by unit. This is below the Local Plan target of 40% by unit and would not meet the Local Plan tenure split target for this part of the borough of 60:40 split (London Affordable Rent: Shared Ownership). However, scrutiny by consultants acting for the Council have concluded that the proposed scheme is unviable and does not provide sufficient profit to meet an appropriate Minimum Developers Return. In other words, it can be seen as being beyond the 'maximum reasonable amount' called for by London Plan and Local Plan policies.
- 9.3.51 The proposed affordable housing would provide a reasonable dwelling mix, although with less family-housing than Local Plan policy calls for, and be generally well integrated with other housing tenures, although there would be none within the proposed Build to Rent element. The proposed London Affordable Rent and Shared Ownership homes would meet the Mayor's affordability criteria. The Council would be offered "first option" at buying the London Affordable Rent and Shared Ownership homes in Phase 1.
- 9.3.52 Officers have secured improvements in the amount and type of affordable housing over the course of discussions at pre-app and determination stages. On balance, officers consider the proposed offer to be acceptable, subject to Early, Mid and Late stage reviews.

9.4 Design

- 9.4.1 The NPPF (Para. 122) states that in respect of development density, consideration should be given to whether a place is well designed and 'the desirability of maintaining an area's prevailing character and setting...or of promoting regeneration and change'. The National Design Guide identifies 10 key characteristics which work together to create physical character and help to nurture and sustain a sense of community.
- 9.4.2 The key relevant adopted and emerging development plan policies are referred to below, in relation to different sub-headings

Design development

- 9.4.3 The applicants have developed an Illustrative Masterplan for the whole site, informed by a number of placemaking principles, and it is this that has

informed the proposed detailed designs for Phase 1 (the 'full' element) and the Parameter Plans and Design Code for Phase 2 (the 'outline' element).

9.4.4 The proposed scheme has undergone a number of iterations throughout a long pre-application process, which has included extensive pre-application discussions with officers, GLA officers, local people and the Enfield Design Review Panel (DRP) (in August 2018 and March 2019). The conclusions from the March 2019 DRP are as follows:

- The site offers a rare opportunity to create a significant amount of housing, workspace and supporting uses, while also having to respond to some challenging edge conditions, such as the A10 and adjacent uses;
- There are several large-scale issues that need to be addressed and this has so far limited the discussion on the more detailed elements of the scheme such as the relationship between buildings, their design and internal layouts;
- There are positive elements of the scheme including the emerging approach to the architecture and building typologies. However, significant concerns remain in relation to the density; the massing and height of the buildings; the amount, distribution and limited sizes of public open space; the lack of private and semi-private amenity spaces; the hierarchy of streets and spaces; the daylight and sunlight levels to spaces and buildings; and the approach to movement through the site, including the proposed cycle routes and servicing strategies; and
- The site is likely to remain an island for a significant period of time, and there is a real danger that it will feel isolated and disconnected from the communities that surround it. With the currently proposed densities, all elements of the design need to work very hard to provide an acceptable quality of life and the current proposals appear to fall short of what is needed.

9.4.5 In response to these and earlier DRP comments, the emerging scheme was further developed to allow for an increased number of dual aspect homes, reduce height and amount of development, provide a more considered ground floor layout, improve facade activation of the public realm by ground floor uses, provide a clearer serving and transport strategy and provide green. protective edges around the site. A number of post-submission changes to the proposed Parameter Plans and Design Code were submitted in July 2020 in response to officer comments.

Layout

9.4.6 Published London Plan Policies 7.1 and 7.4 and Intend to Publish London Plan Policies GG2, D1 and D2 seek to ensure that new developments respond positively to local form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment and are high quality. Intend to Publish London Plan Policy D3 requires developments to optimise capacity through a design-led approach, by responding to a site's context, capacity for growth and supporting infrastructure capacity.

9.4.7 Local Plan Core Policy 30 and Local Plan Policy DMD Policy 37 call for high-quality design-led development. Local Plan NEEAP Policy 5.3 seeks

improvements to public realm in the areas and Policy 8.2 calls for additional open space to be provided as part of new developments. The Enfield Characterisation Study (2011) identifies the site as being within the site is located within a 'Mixed Urban Areas – Big Box' typology.

9.4.8 The site and its surroundings are characterised mainly by busy roads, retail parks and industrial areas. To be successful, a residential-led mixed-use scheme needs to respond positively to these harsh urban characteristics and create its own high-quality environment. In doing so, new housing needs to be located and designed such that it safeguards the continued employment use adjoining Strategic Industrial Land and on-street bus standing areas on Dearsley Road.

9.4.9 The submitted Design and Access Statement sets out a number of Illustrative Masterplan principles that have informed the proposed layout. These can be summarised as follows:

- Active edges and healthy streets – setting back edges of development from site boundaries in order to improve the quality of the streetscape while also creating strong edges to respond to noise and air pollution and shield the interior of the site (with generous landscaping, planting and green walls to reduce the worse effects of pollution);
- Defining the Heart – creating a public space and adjoining retail/café/restaurant/ business uses for the new community within Phase 1 at the confluence of several routes that run through the site, giving the scheme a focal point where people can gather and socialise;
- Connecting the Heart – creating (a) a southern gateway at the junction of Great Cambridge Road and Southbury Road, lined with ground floor commercial uses; (b) an eastern gateway connecting with Baird Road, Southbury Road and Southbury Station and (c) a north/south route from the Heart to Dearsley Road to accommodate pedestrians and cyclists wishing to avoid the Great Cambridge Road.
- Secondary connections – providing secondary east-west and north-south connections to surrounding areas;
- Creating podium courtyards – introducing podium courtyards to Blocks and Plots; and
- Shaping the perimeter – breaking up elevation of Blocks and Plots into smaller facades in order to give the impression of many smaller buildings.

9.4.10 The landscape principles aim to establish a well-defined framework of accessible public space to create distinct character areas, in the form of green “Edges”, “Parks”, “Residential Streets” and the “Heart.” These spaces have been designed around a Healthy Streets Approach and aim to create multi-functional, safe and attractive social spaces which mitigate noise, air quality and surface water flooding issues and embed different types of play space across the site. The proposed Parameter Plans have been revised to allow for greater opportunities for non-residential uses at ground floor on some key internal and external frontages.

9.4.11 The Dearsley Road “edge” would include a continuous 2m wide footway and structured and street tree planting and some SuDs features (with the existing McDonald’s drive-through and Sainsbury store and service yard on the other side of Dearsley Road). The Great Cambridge Road “edge” would include the existing footway and two-way cycle lane running alongside the outer edge of

the site and semi-mature trees and dense underplanting set back within the site, to mitigate noise, poor air quality and wind. The Baird Street “edge” would be similar.

- 9.4.12 The proposed Linear Park in Phase 2 (typically 21m wide and approx. 110m long, measuring approx. 0.3ha), between Plots G, H and J would provide a green spine running north-south through the site, connecting the quieter residential areas in the north with the more activated “Heart” in the south. The intention is that this would include meandering paths, areas for play, planting that provides seasonal interest, picnic tables and buffer planting to ground floor homes, providing a different character along its length.
- 9.4.13 The Meadows Park in Phase 2 (minimum 15.75m wide and approx. 60m long, measuring approx. 0.1ha), between Plots D and G would include a large play area for younger children in the south and an open lawn area in the north, long sculptural benches and buffer planting to ground floor homes.
- 9.4.14 The residential streets would be designed to provide low-speed vehicular access, but would prioritise walking, cycling and doorstep play. They would incorporate shared surfaces, rain gardens, pocket spaces with seating, tree species to enhance character. Junctions where streets meet would be designed to be ‘nodes’ which provide meeting places.
- 9.4.15 The “Heart” in Phase 1 would be an urban piazza with a central green space and pocket green spaces, a programmed event space and commercial frontages with cafes and restaurants. Following comments from the Mayor in his Stage 1 Report, the detailed proposals have been revised to include a public drinking fountain.
- 9.4.16 The phased delivery of the overall scheme means that there would be a temporary landscape edge along the northern boundary of Phase 1 and a temporary car parking area on the eastern edge of Phase 1. The temporary northern edge would incorporate open spaces, trees, play and car parking spaces, together with a pedestrian access linking with the surface car parking that would continue to serve Buzz Bingo, Dunelm and KFC in the short-term.
- 9.4.17 Officers are generally supportive of the proposed masterplan and landscape principles. The proposed buildings in Phase 1 and Plots in Phase 2 would create perimeter blocks, with a clear differentiation between public and private spaces. There would also be a clear and legible route network and the proposed public spaces are logically located to encourage activity while protecting them from the harsh conditions of the A10. Subject to incorporating the design and mitigation measures outlined in Section 9.5 of this report, officers are also satisfied that the proposed new housing would safeguard adjoining Strategic Industrial Land (allowing businesses to operate on a 24-hour 7-day per week basis) and existing bus layover spaces, in line with published London Plan Policies 2.17, 6.2 and 7.15, Intend to Publish London Plan Policies E5 and T3 and Core Strategy Policy 13. The submitted daylight, sunlight and overshadowing and wind assessments demonstrate that public spaces would be well lit and experience acceptable wind conditions.
- 9.4.18 Proposed Plot J in Phase 2 would be closer to the A10 than Block A in Phase 1. Ideally, it should be set back by a similar distance. However, this would have significant implications for Plot and street widths and, on balance, the proposed siting is considered acceptable.

9.4.19 The revised detailed proposals for Phase 1 are considered to represent high-quality design, although there are two issues that are recommended to be addressed by planning condition. Firstly, the lack of activation of the ground floor of the eastern part of Block C, where it is proposed that a condition reserve details to allow for innovative frontage details decorative brickwork, green walls, information boards. Secondly, the relative lack of SuDS features such as rain gardens and filter strips, which has been addressed by the submitted SuDS Design Note 28 July 2020 and the recommended condition.

Public Realm, Open space, Trees and Urban Greening

- 9.4.20 Published London Plan Policy 5.10 promotes urban greening and multifunctional green infrastructure to help reduce effects of climate change and Policy 7.21 seeks to protect important trees and secure additional planting. Intend to Publish London Plan Policy G5 supports urban greening and introduces the concept of an Urban Greening Factor and Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement.
- 9.4.21 Local Plan Policy DMD 37 requires all new major residential development to be accompanied by proposals to improve open space provision (with justifying text referring to a borough-wide standard of 2.37 hectares per 1,000 population for park provision). Local plan Policy DMD Policy 80 requires all development that involves the loss of or harm to trees covered by Tree Preservation Orders or trees of significant amenity or biodiversity value, to be refused unless there are exceptional circumstances that can be justified.
- 9.4.22 The 'full' element for Phase 1 includes green amenity space in Buildings A and B and the Illustrative Scheme for Phase 2 includes communal amenity space (courtyards, podiums, roof terraces etc. for each Plot. This is likely to amount to approx. 0.7 hectares. When added to the proposed approx. 1.6ha publicly accessible space (parks, streets and the Phase 1 piazza space), this is likely to amount to approx. 2.3ha (or approx. 55% of the site). This space would be a mixture of 'hard' and green spaces. Within the publicly accessible spaces would be two predominantly green parks: the Linear Park (approx. 0.25ha) and the Meadows (approx. 0.10ha).
- 9.4.23 ES Chapter 13 estimates the total population from the reasonable worst case maximum of up to 1,800 homes as approx. 3,643 once fully occupied. The proposed amount of park space is significantly below what the indicative borough-wide standard would require. However, officers consider that this would be partly mitigated by the proposed high-quality nature of the proposed park space, shared streets and other public realm areas and the high-quality nature of proposed private and communal space. Officers also consider that the proposed scheme would provide an appropriate balance of open space and development, given the need to optimise housing density and scheme viability, that would deliver substantial public benefits. As discussed in Section 9.11, it is recommended that financial contributions are secured to fund improvements to Bush Hill Park and Enfield Playing Fields (and improvements to pedestrian access to the latter) to provide for older children play provision and help ensure that the proposed scheme would not have an adverse impact on Epping Forest.

- 9.4.24 It is recommended that s106 planning obligations ensure public access to proposed streets and open spaces on a 24hour/365 day a year basis and that a public art strategy for Phase 1 is submitted and approved by the Council.
- 9.4.25 The submitted Arboricultural Method Statement reports that there are 60 live trees on site or immediately adjacent to it in a collection of groups (including Common Lime, Whitebeam, London Plane, Norway Maple and Elder). These are mainly along the A10 and Dearsley Road frontages. None of these are identified as being important specimens/groups in terms of appearance, character or biodiversity and none are identified for retention. Officers agree with this assessment.
- 9.4.26 Following discussions with officers and comments in the Mayor's Stage 1 Report, revisions submitted in July 2020 increase planting and tree cover for the proposed temporary car parking and identify indicative locations where green walls that could be introduced in Phase 1. The applicants have also committed to the additional use of rain gardens and filter strips in Phase 1. These additional measures, which are recommended to be secured by condition, together with Living Roofs on some Plot roofs in Phase 2 would increase the Urban Greening Factor (UGF) to 0.25 in the Illustrative Scheme and would result in a net increase of 270 trees (120 permanent and 150 temporary trees to be moved from Phase 1 to Plots in Phase 2). Whilst the UGF would be below the interim target score of 0.4 advocated in Intend to Publish London Plan Policy G5, officers are satisfied that the applicants have optimised urban greening in Phase 1, when balanced against other policy objectives, and that the proposed scheme would result in a significantly greener and more pleasant environment.
- 9.4.27 Landscaping, Layout and Appearance are reserved matters and RMAs for Plots in Phase 2 would set out details of additional tree planting and urban greening. The proposed Meadows and Linear Park, streets and courtyards provide many opportunities to introduce additional trees and urban greening. The Design Code includes a number of relevant mandatory and advisory codes in relation to roof level amenity, character areas for parks and streets, tree planting and SuDS which should help ensure that these opportunities are fully exploited. In response to the Mayor of London's Stage 1 Report, the applicants submitted additional information in September 2020 identifying potential roof space on Plots in Phase 2 that could accommodate Living Roofs (some in combination with providing a PV array).

Inclusive design, personal safety, management and maintenance

- 9.4.28 The submitted Design and Access Statements sets out how the proposed scheme has addressed inclusive design issues. The site is relatively flat and Phase 1 has been designed to provide level pedestrian circulation to all proposed spaces and buildings, with generous walkways, external lighting and use of contrasting materials to help legibility and wayfinding (signage is also proposed) and building entrances would be legible and marked. Proposed landscaping has been chosen for its scent as well as visual amenity/ biodiversity considerations and, following comments from the GLA, a public drinking fountain has been included near the proposed Hub events space. The Design Code includes a number of relevant mandatory and advisory codes and officers are satisfied that the proposed scheme would create an inclusive environment. The accessibility of proposed homes is discussed in Paras. 9.5.11 below.

9.4.29 The applicants intend to establish a management company to manage and maintain the public realm and to curate activities in the proposed Phase 1 Hub events space. It is recommended that s106 planning obligations secure the implementation of an approved management and maintenance plan and the provision of a public drinking fountain in both phases.

Scale and Massing

9.4.30 Published London Plan Policy 7.4 encourages new development to draw on the form, function and structure of a place, whereas Policy 7.6 calls for scale and massing to help create a coherent cityscape. Intent to Publish London Plan D4 calls for masterplans and design codes to help place-making and optimisation of density.

9.4.31 Local Plan Policy DMD 37 requires high-quality, design-led development and sets out seven urban design principles around character, continuity of enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity.

9.4.32 Published London Plan 7.7, Intent to Publish London Plan Policy D9 and Local Plan Policy DMD 43 7 require the location and design of tall and large buildings to be particularly carefully considered and this is discussed in detail below.

9.4.33 With such a poor-quality surrounding townscape, the applicants have drawn on Enfield Town for inspiration. The submitted Design and Access Statement sets out height and massing principles, which can be summarised as follows:

Protective edges – the need for sufficient height to provide strong edges to mitigate noise and poor air quality and to shield the interior of the site – with proposed building height responding to the width of these wide spaces (roads (the A10 is approx. 70m wide, Dearsley Road is approx. 55m wide and Baird Road is approx. 35m wide) with taller building located along;

Hierarchy of scales – buildings are broken up in to smaller facades to give the impression of many smaller buildings and facades in each Block/Plot vary in height to reinforce the idea that each Block/Plot is a townscape in miniature;

Articulated Building Line – facades are pushed inwards and outwards along a street edge to give another layer of identity and to define corners; and

Variety of Roofspaces – roof shapes would vary to reflect the rich variety that is in Enfield Town.

9.4.34 The Design and Access Statement also identifies a family of building typologies – including ‘townhouses’, ‘mansion blocks’, ‘link buildings’, ‘shoulder building and ‘tall buildings.’ The above principles and typologies are evident in the proposed Phase 1 scheme and the proposed Parameter Plans and Design Code, which includes a number of relevant mandatory and advisory codes, should ensure that these principles are embedded in detailed designs for Plots in Phase 2. The Illustrative Scheme shows one way in which the proposed Parameter Plans and Design Code could result in a varied range of heights on Plots in Phase 2 (see Appendix 1). In summary, these are:

- Plot D – 3, 7, 9 and 16-storeys;
- Plot E – 3, 5, 7 8, 11 and 13-storeys;
- Plot F – 1, 3, 4 and 5-storeys;

- Plot G – 2, 6, 8, 9, 11, 14 and 24-storeys;
- Plot H – 2, 6, 8, 9 and 14-storeys; and
- Plot J – 4, 5, 7, 8,10, 12, 14 and 16-storeys.

9.4.35 Officers are supportive of the proposed variety in scale and massing of both Phase 1 and Phase 2 and consider that the proposed ‘low and tall’ and roofscape contrasts are playful and would result in a development that would have a strong distinctive character.

9.4.36 The proposed parameters would allow for basement development in Phase 2 and it is recommended that condition requires RMAs for a Plot in Phase 2 that proposes basements to be accompanied by a Basement Impact Assessment.

Articulation and Materials

9.4.37 The submitted Design and Access Statement explains that in order to create a distinctive architectural language and character for the proposed family of buildings described above, the design team has drawn inspiration from Enfield Town. The approach to the family of building typologies in Phase 1 is summarised below and a number of proposed elevations are included in Appendix 1.

9.4.38 Block A1 – Tall building. The proposed facades are subdivided into a series of horizontal and vertical bays to establish a clear order and these are further articulated through the use of contrasting materials to establish primary and secondary elements. They are also articulated by recessed balconies to give them depth and establish a clear base, middle and top – with an expressed ‘crown’ at the top of the building. A light, white brick is proposed for the frame, with cream brick inserts as a backdrop and dark red metal elements for contrast (balustrades, balcony soffits and panelling). The proposed lower shoulder elements would also include green glazed brick.

9.4.39 Block A2 – Mansion Block. The facades would again establish a clear base, middle and top. However, here, proposed bays are pushed and pulled from the principal façade line and external balconies are used to provide depth and the building would be topped with pitched roofs. Red bricks would be used as the base material, with brown for the shoulder element, with light colour metal balconies and light grey fibre cement ‘shiplap’ type cladding.

9.4.40 Block B – Urban Townhouses. The proposed building is broken down in to a series of sub-plots, with tall mid and low elements. Variation and layering would be achieved by set-backs (thus avoiding a walled development) and shouldered massing and different roof typologies would create variation to the skyline and reduce the effects of height. In common with Buildings A and C, red, mid brown and dark brown bricks would be used, this time in different combinations for the different sub-plots, with white bricks for finishing window lintels and sills. Again, ‘shiplap’ type cladding, of various colours, would be used and a distinctive ‘chimney’ feature would also be included at the western end.

9.4.41 The Workhub. In contrast to other proposed buildings, the proposed hub office/ workspace building would be more industrial in character, with a strong grid structure and the use of dark grey and dark red metal cladding and panels. There would be an external terrace at fifth floor level and an open top crown would conceal recessed plant (in a contrasting grey cladding).

- 9.4.42 Block C – Heart Marker. This single block, served by one core, would be split to look like a series of buildings that were developed and built over a period of time. A row of townhouses would be joined with a taller element, whose massing is offset through a ‘shoulder’. Variation and layering would be achieved by setbacks in the building line and different roof typologies to add further variation to the skyline. Two ‘chimneys’ would be included to strengthen character. A similar palette of external materials to those for Blocks A1, A2 and B are proposed, with the taller element echoing features on Block A1.
- 9.4.43 Overall, officers support the detailed design of the Phase 1 buildings and consider that they would provide a well-articulated and characterful family of buildings. Officers are also satisfied that the proposed Design Code provides a good framework set of mandatory and advisory codes that should ensure a similarly rich variety of high-quality buildings in Phase 2. It is recommended that s106 planning obligations retain the current architects for detailed design and implementation of Phase 1 and that planning conditions require detailed design elements to be approved by the Council. It is also recommended that s06 planning obligations require that all RMAs in relation to Plots in Phase 2 are considered at pre-application stage by the Design Review Panel.

Tall Buildings

- 9.4.44 Published London Plan Policy 7.7 states that tall buildings should generally be limited to sites such as areas of intensification or town centres that have good access to public transport; should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building; should individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London; should contribute to improving the permeability of the site and wider area, where possible; and should make a significant contribution to local regeneration.
- 9.4.45 Intend to Publish London Plan Policy D9 states that boroughs should determine if there are locations where tall buildings may be appropriate and proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings.
- 9.4.46 Local Plan Policy DMD 43 is a criteria-based policy for considering tall buildings, which justifying text (para. 6.4.1) defines as those “that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.” This policy and the Report on Location of Tall Buildings and Important Local Views in Enfield (March 2012) that it refers to is discussed in detail below.
- 9.4.47 Given the low-rise nature of the surrounding area and the definition in the Local Plan, the majority of the proposed buildings could be considered as ‘tall’ and the assessment below takes account of this. However, particular attention has been given to the proposed buildings in Phase 1 and proposed parameters for Phase 2 that would include elements that would or could be 30m above ground or more (the height that triggers referral of applications to the Mayor of London). These are as follows:
- Block A – part 29-storays (part 126m AOD*);

- Block C – part 18-storeys (part 88.95m* AOD);
 - Plot D – part 89.95m AOD*;
 - Plot E – part 75.70m AOD*;
 - Plot G – part 111.85m AOD*;
 - Plot J – part 88.75m AOD*.
- *24.6m AOD ground level

9.4.48 The paragraphs below consider the acceptability of tall buildings against the key relevant policy objectives:

- Location;
- Transport network capacity;
- Spatial hierarchy and wayfinding;
- Views;
- Heritage assets;
- Architectural quality and design;
- Amenity space and publicly accessible areas.
- Micro climate;
- Safety, servicing and management;
- Economic benefits; and
- Cumulative impacts.

9.4.49 Location. The strategic requirement of Intend to Publish London Plan Policy D9 Part B is for a plan-led approach to be taken for the development of tall buildings by boroughs and makes clear that tall buildings should only be developed in locations that are identified in development plans. Local Plan Core Policy 30 and DMD Policy 43 makes clear that tall buildings are permissible in appropriate locations.

9.4.50 The site is not explicitly identified in the Local Plan as a location that is appropriate for tall buildings, however, DMD Policy 43 is criteria based and this does not necessarily make the location inappropriate. The site is free from immediate heritage, physical and Green Belt constraints, and is therefore not an 'inappropriate location', as defined by DMD Policy 43 Part 1. The site meets or partially meets two of the criteria from Policy DMD 43 Part 3 for being an appropriate location in that: (a) it has a forecast PTAL rating of mainly 3 (Moderate)', with the southern edge as 4 ('Good) and (c) is deemed to be within a regeneration area, given that it is in North East Enfield, one of four areas where the spatial strategy in the Council's Core Strategy seeks to focus growth and regeneration, and is in an Area for Regeneration as defined in the Council's Core Strategy and DMD, published London Plan Policy 2.14 and Intend to Publish London Plan Policy SD10 (wards in the bottom 20% most deprived wards in the Borough/London). Policy 43 Part 3 states that applications meeting more than one of the criteria can be considered an appropriate location, subject to other criteria being met.

9.4.51 The site is within a 'sensitive location', as defined by DMD Policy 43 Part 2, being entirely within View 9 (approach to Enfield Town) and the southern-most part of the site being within View 2 (King's Head Hill). However, this does not mean necessarily that the proposed buildings are inappropriate; rather that careful consideration of possible harm to these views is required.

9.4.52 Transport network capacity. The ability of the public transport network to accommodate high-density development is discussed in Section 9.8 below. In summary, officers agree with TfL that, subject to securing financial

contributions to improve bus services and Southbury Station, the network would be able to cope satisfactorily.

- 9.4.53 Spatial hierarchy and wayfinding. The applicants claim that Block A would mark the junction of the A10 and Southbury Road and would establish a legible link between Enfield Town and Ponders End. They also state that Block C would mark the 'Heart' and would provide wayfinding to the 'Heart' from Southbury Station.
- 9.4.54 In terms of Plots D and G, the applicants make the case that these would act as northern gateways and mark the position of the two main green spaces of the proposed scheme (the Meadows and the Linear Park) from the northern approach to the Site and from Enfield Playing Fields.
- 9.4.55 Officers do have some concerns that the particular height of the tall buildings as proposed would have a negative impact on the legibility of the borough, particularly in medium and longer views when experienced as part of the Borough's existing townscape. This is because the proposed scheme would be visually prominent and indicate a level of importance in the borough which is not appropriate to the particular site and what would be a primarily residential development. However, on balance, officers consider that Buildings A and C, in particular, would act as positive high-quality markers of a new mixed-use neighbourhood, on a key junction close to a railway station and within a regeneration area which the Regulation 18 Issues and Options Local Plan indicates as having potential for redevelopment. Furthermore, Enfield is changing and growing and as it does so, new neighbourhoods and places of significance, such as the one proposed, will emerge and Borough legibility will continue to evolve.
- 9.4.56 Views. Chapter 11 of the ES and the submitted Townscape and Visual Impact Assessment (TVIA) assesses the effect of the proposed scheme from a number of verified views and Townscape Character Areas (TCAs) that have been agreed with officers.
- 9.4.57 The TVIA concludes that the proposed scheme, as a whole, works well as a coherent cluster of buildings with a clear group identity and character and that together the two phases signal the creation of a significant new place with a critical mass and high-quality architecture. It goes on to note that in many of the long-range views, visibility of the site is limited (i.e. it is not seen or is seen in glimpsed views) because of topography and the pattern of development in the area. The TVIA finds that the greatest degree of change would be in local views, where Phase 1 would appear as a high-quality addition to views. Overall, it concludes that the proposed scheme would have a beneficial effect in 17 out of 19 views tested. The TVIA identifies the greatest degree of change in terms of TCAs as being in TCA 1, in which the site is located, where it would represent a substantial improvement to the current situation by providing new routes/permeability and improving legibility. Officers generally agree that impact on the identified views would be either beneficial or at least not harmful. The exception is View 34, Forty Hill Conservation Area, where officers consider that there would be some harm.
- 9.4.58 The scheme would not affect any strategic views identified in the London Plan. Whilst the site is wholly within designated local View 2 and partially within designated View 9, officers consider that verified views 24 and 23 in

the TVIA demonstrate that the scheme would not significantly harm them and that, generally, the scheme would have a positive effect on townscape.

- 9.4.59 Heritage. The likely effects of the proposed scheme on designated and non-designated heritage assets is discussed in Section 9.6 below.
- 9.4.60 Architectural quality and design. The proposed massing of the taller element of Block A is defined through a tripartite hierarchy (splitting the elevation into a base, middle, and top element) and the architectural language of the taller element would be based on a rectangular grid. The simplicity of design would also be reflected in the materials (light bricks and dark red metal elements). The taller element of Block C is similarly designed and would be offset by a shoulder building and various roof typologies and the colour and the proposed materiality would be kept simple, with the use of brown and white bricks with off-white metalwork. Officers consider that these buildings would be sufficiently high-quality given their visibility and prominence.
- 9.4.61 The Design Code sets the standard for quality and design of the taller buildings in Phase 2. It requires all tall buildings to be expressed in a tripartite hierarchy with brick cladding, as per the tall buildings in Phase 1. These details would be assessed at reserved matters stage and officers are satisfied that the Design Code (augmented by the Design Review process) would result in sufficiently high-quality buildings.
- 9.4.62 Amenity space and publicly accessible areas. The quantity and quality of proposed amenity space and public realm is discussed in Paras. 9.4.20 to 9.4.27. In summary, officers consider these aspects of the proposals to be acceptable. It is not considered appropriate for the proposed tall buildings themselves to incorporate publicly accessible space, in the way it may be for a tall building in Central London.
- 9.4.63 Microclimate. The likely effects on daylight sunlight and overshadowing and local wind conditions are discussed in Paras. 9.5.22 to 9.5.27 and Section 9.12 respectively. In summary, officers consider that any likely negative effects would be acceptable.
- 9.4.64 Safety, servicing and management. Fire safety and servicing are discussed in Paras. 9.4.70 to 9.4.72 and Section 9.6 respectively. In summary, officers consider these aspects of the proposed scheme to be acceptable. The 29-storey building in Block A would form part of a Build to Rent building, which would be highly managed. The ground floor of Block C would include a concierge, together with space for estate management staff that would manage the whole of Phase 1. Building and estate management would form part of detailed proposals for Plots in Phase 2 in due course.
- 9.4.65 Economic benefits. The economic and regenerative benefits of the proposed are discussed in Section 9.6 when discussing heritage issues.
- 9.4.66 Cumulative impacts. The cumulative impact of tall buildings has been assessed as part of the TVIA, which concludes that there would be no negative effects. Officers generally agree that the verified views in the TVIA demonstrate that the proposals, when viewed with committed schemes, would be acceptable. Chapter 14 of the ES reports on a wider assessment of likely significant cumulative effects (this proposed scheme with committed schemes) in relation to transport and traffic, noise and vibration, daylight and

sunlight, townscape and visual and socio-economic and human health effects. This generally found that in-combination effects would be no greater than the scheme in isolation. The exception was Socio-economic and human health, where a beneficial effect was identified, linked to the proposed delivery of a health facility in the scheme.

Tall Buildings conclusion

9.4.67 Officers do have some concerns that the particular height of the tall buildings as proposed would have a negative impact on the legibility of the borough, particularly in medium and longer views when experienced as part of the Borough's existing townscape. In addition, the DRP has expressed concerns about proposed building heights (although it should be noted that proposed heights have been reduced since the Panel considered the scheme at pre-application stage). Nevertheless, this section demonstrate that the site is appropriate for the proposed tall buildings when considered against criteria-based Local Plan Policy DMD43 for the following reasons:

- Whilst the site is in a 'sensitive location' (Views 2 and 9), the proposed tall buildings would not harm these views;
- Subject to improvements, to be funded by the scheme, public transport capacity would be able to support the proposed density;
- Whilst there is some concern about the particular heights proposed and the impact on existing Borough legibility, the proposed tall buildings would act as positive markers of a new mixed-use neighbourhood on a prominent junction, close to a railway station and in a Regeneration Area;
- Whilst some harm would be caused to the setting of Queen Elisabeth Stadium (Listed, Grade II), Forty Hall Estate (Listed Grade I) and Forty Hill Conservation Area and the setting of Ripaults Factory and Enfield Technical College (Listed, Grade II), this is deemed to be at the lower end of 'less than substantial' in relation to the Stadium, Forty Hall Estate and Forty Hill Conservation Area and negligible for Ripaults Factory and the Technical College and would be outweighed by the public benefits that the scheme would deliver;
- The proposed design of tall buildings in Phase 1 is sufficiently high-quality and the Design Code (augmented by the Design Review process) should ensure the same is true for Phase 2;
- The quantity and quality of proposed associated amenity space and public realm is acceptable;
- The resultant microclimate (daylight/sunlight/overshadowing and wind) of surrounding areas would be acceptable;
- Subject to recommended conditions, s106 planning obligations and Building Regulations approval, fire safety, servicing and management arrangements would be acceptable;
- The economic and regenerative benefits that would come from the scheme would be substantial; and
- The cumulative effects of the scheme, when considered alongside committed development, would be acceptable.

Secured by Design

9.4.68 Local Plan DMD Policy 37 require all developments to demonstrate and apply the principles and practices of the Secured by Design Scheme. The applicants' design team has met with the Metropolitan Police's Designing Out Crime Officer (DOCO). The 'full' scheme for Phase 1 provides a good level of

active frontage and there is good natural surveillance of communal and public areas from proposed commercial units. The Design Code includes a number of relevant mandatory and advisory codes that should ensure the same for Phase 2 (with specific reference to Secured by Design where relevant). Following comments from officers, the codes for Plot F have been revised to address potential security between Plot F and the site boundary.

- 9.4.69 At the request of the DOCO, it is recommended that a planning condition ensures that Phase 1 achieves compliance with the relevant Secured by Design Guide (or suitable alternative). Secured by Design issues would be addressed in Design and Access Statements that support RMAs for the various Plots in Phase 2.

Fire Safety

- 9.4.70 Intend to Publish London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage: "In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety..." Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users.
- 9.4.71 The application is supported by an Outline Fire Strategy, as required by emerging London Plan Policy D12. The London Fire Brigade has advised that the applicants ensure the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector. It also strongly recommends that sprinklers are considered for new developments. Building Control officers have also queried the applicant's strategy on use of sprinklers and commented that fire service access should be developed further at this stage.
- 9.4.72 In response, the applicants have confirmed that all its buildings, including residential, commercial bin stores and bike stores in Phase 1 would be fitted with sprinklers and that this strategy would also be followed in detailed designs for Plots in Phase 2 (where all car parking areas would also be fitted with sprinklers). The submitted Fire Strategy does set out satisfactory emergency vehicle access arrangements for the 'full' element of the scheme (Phase 1). Access is a Reserved Matter and emergency access for Plots 2 in Phase 2 would be identified and assessed at RMA stage. It is recommended that planning conditions require compliance with the submitted Outline Fire Strategy in relation to Phase 1 and the submission of Fire Statements to support RMAs for Plots in Phase 2, in accordance with the Mayor of London's draft Fire Statements Guidance (July 2020).

Conclusion of Design

- 9.4.73 Overall, officers consider the proposed design to be acceptable. The 'full' detailed scheme for Phase 1 and the proposed parameters and Design Code for Phase 2 are based on a layout that responds well to the harsh environment around it and would safeguard existing industrial uses and bus infrastructure. Both elements would also create a good 'internal' environment for new residents, optimising the amount of proposed open space, including active/playful streets and public realm and connecting well with the surrounding area. Hard and soft landscaping would be of a high-quality,

helping to create what should be a much greener, inclusive, safe, secure and attractive new place.

9.4.74 The proposed massing strategy based on a ‘family’ of building typologies with their different scales, features, articulation and rooflines and the use of a common palette of materials, should create a varied and distinctive character. The proposed tall buildings have been scrutinised in detail and, whilst some concerns remain regarding the particular heights proposed and the impact of the taller elements on Borough legibility given the high-quality of their design, their roles as markers of a new neighbourhood on a key junction close to a station and the merits of the scheme as a whole, officers consider them to be acceptable.

9.5 Residential Quality and Amenity

9.5.1 The NPPF (Para. 12) identifies good design as a key aspect of sustainable development, stating that ‘the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve’.

Accommodation Standards

9.5.2 Published London Plan Policy 3.5 and Intend to Publish London Plan Policy D6 sets out detailed housing design requirements in relation to floorspace, storage space, layout, floor to ceiling heights, orientation and aspect, overheating, daylight and sunlight and outdoor amenity space. The Mayor’s Housing SPG (2016) provides guidance on implementing these policies.

9.5.3 Local Plan Core Policies 4 and 5 call for high-quality new housing, Local Plan Policy DMD 8 includes general standards for new residential development and Policy DMD 9 sets out standards in relation to amenity space.

9.5.4 The most up-to-date housing quality standards are set out in Intend to Publish London Plan Policy D6 and Table 10 below assesses the proposed scheme against this policy.

Table 10: Phase 1 housing quality and standards

Policy objective	Phase 1
Part A requires housing development to be of a high-quality design, with adequately sized rooms, with comfortable and functional layouts that are fit for purpose	All homes would meet or exceed the minimum floorspace and floor-to-ceiling standards.
Part B states that key qualitative aspects should be addressed, relating to layout, orientation and form, outside space, and usability.	Proposed layout, orientation and outlook of the proposed homes are acceptable. Officers have secured revisions that improve natural daylight to some communal spaces.
Part C states that the provision of dual aspect dwellings should be maximised and that single aspect dwellings should only be provided where it is a more appropriate design solution.	75% of proposed homes would be dual aspect, with single-aspect homes included where unavoidable and to help optimise density. None of the single aspect homes would

Policy objective	Phase 1
	be north facing.
Part D states that the design of development should provide sufficient internal daylight and sunlight, while avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.	Objectives would generally be met. See Paras. 9.5.22 to 9.5.27 for detailed assessment of Daylight, Sunlight and Overshadowing and Para. 9.10.14 for discussion on overheating.
Part E states that housing should be designed with adequate and easily accessible storage space.	All homes have been designed to include storage space in accordance with Mayoral standards.
Part F states that minimum standards should be met for private internal space and private outdoor space (minimum 5 sqm for one and two-person homes, and an extra 1 sqm per additional person).	All private amenity space (with the exception of some homes in Block A) would be provided to meet these standards and would do so in the form of a mixture of recessed and external balconies, podiums and courtyards.

- 9.5.5 The proposed housing in Phase 1 generally meets the above policy objectives and would comprise high-quality homes and spaces.
- 9.5.6 The A10 provides a particularly noisy frontage to the site and also experiences poor air quality. The Mayor's Housing SPG states that in exceptional circumstances ("where site constraints make it impossible to provide open space for all dwellings"), a proportion of dwellings may instead provide additional living space equivalent to the private open space requirement. In total, 133 Build to Rent and Shared Ownership homes in Block A would be 'over-sized' and incorporate internalised amenity space (which would be provided in addition to the London Plan's minimum floorspace standards). Officers consider this to be acceptable.
- 9.5.7 The different assumed levels of housing for Phase 2 (i.e. 121,000sqm and 1,143 homes, or up to 143,000sqm and 1,356 homes) are based on minimum dwelling gross internal floor areas (GIA) as denoted in Table 1 of the Technical Housing Standards – Nationally Described Space Standard (March 2015).
- 9.5.8 The detailed design of homes and outdoor spaces in Phase 2 would be subject to RMA approval. The proposed Design Code sets out comprehensive mandatory and advisory codes which should help ensure high quality homes are delivered. Officers have secured revisions to the proposed Code to emphasise the importance of maximising the provision of dual-aspect homes.

Accessible Housing

- 9.5.9 Published London Plan Policy 3.8 and Intend to Publish London Plan D7 Requires at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building

Regulation requirement M4(2) 'accessible and adaptable dwellings.' Local Plan DMD Policy 8 has similar policy objectives.

9.5.10 Phase 1 would include 55 adaptable (Regulation M4(3) (2b) 'wheelchair user dwellings', which represents 12% of all proposed homes. The proposed homes would be appropriately sized and detailed and served by two lifts (in accordance with best practice). The homes would be distributed within Blocks A2, B1 and C1 and be a mixture of 2 and 3-bed and tenures (37 affordable, both Shared Ownership and London Affordable Rent, and 18 Private), although there would be no 'wheelchair user' Build to Rent homes. In line with Intend to Publish London Plan Policy T6.1, it is initially proposed to provide 3% disabled parking provision, with a further 7% of disabled parking bays being provided if needed. The initial spaces would be located along the temporary northern edge of Phase 1 and relocated in Phase 2. This means they would be some distance from the proposed homes. However, all in all, officers consider that the proposals make good provision for accessible housing, subject to the recommended planning conditions.

9.5.11 Phase 2 is expected to provide at least 10% of homes to be 'wheelchair user' (M4(3) and all others to be 'accessible and adaptable (M4(2) and it is recommended that this is secured by planning condition.

Child Playspace and Recreation Space

9.5.12 Published London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation noting the provision of play space should integrate with the public realm without compromising the amenity needs/enjoyment of other residents and encourage children to play. Intend to Publish London Plan Policy S4 continues this policy approach.

9.5.13 Local Plan Policy DMD 73 requires developments with an estimated child occupancy of 10 or more children will be required to incorporate on-site play provision to meet the needs arising from the development.

9.5.14 The Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG (2012) sets a benchmark of 10 sqm of useable children's playspace to be provided per child, with particular emphasis on playspace for children under five years old to be provided on-site.

9.5.15 Based on the GLA Population Yield Calculator (June 2019), Phase 1 would result in 56 x 0-3-year olds, 55 x 4-10-year olds and 18 x 11-15-year olds and 8 x 16-17-year olds (137 children in total). The 'detailed' scheme for Phase 1 makes provision for 1,242sqm of play space in the form of dedicated and informal, doorstep and 'play on the way' space, including a water feature in the proposed Heart public realm space. Officers consider that the proposed provision is generally high-quality and acceptable.

9.5.16 Estimates of child yield and amount of required play space in the 'outline' Phase 2 element of the scheme would be determined at the Reserved Matters Stage, when dwelling mix and tenure on a particular Plot is known. However, the illustrative scheme demonstrates the ability to accommodate a series of dedicated spaces within residential courtyards, the proposed Meadows Park and streets and the Design Code establishes mandatory and advisory codes for the amount and type of play space.

9.5.17 It should be possible to accommodate all of the required play space needed for Phase 2 on site, with individual Reserved Matters Applications needing to demonstrate that sufficient play space could be provided. However, it would be difficult to successfully accommodate play space for older age groups of children (11-15 and 16-17-year olds) on site without compromising the character and quality of the proposed development. The applicant has therefore proposed a financial contribution towards providing play space for older children (11-years +) off site, on the Enfield Playing Fields. Officers consider this acceptable in principle for older children, given the proposed upgrade of the Crown Road pedestrian crossing to help children cross the road safely and conveniently. The proposed £100,000 contribution is based on the costs of providing a skate park, although it is recommended that a s106 planning obligation that secures this ensures that its intended use is kept flexible, to allow for further consideration/consultation.

Overlooking and privacy

9.5.18 Published London Plan Policy 7.6 makes clear that development should not cause unacceptable harm in relation to privacy. Intend to Publish London Plan D6 calls for high-quality housing and sets out a number of standards – including ensuring that site layout, orientation and design of homes and common spaces provides privacy for residents. The Mayor's Housing SPG (2016) Standard 28 is reinforces the need for privacy but cautions against adhering rigidly to minimum distance requirements.

9.5.19 Local Plan Policy DMD8 requires new development to preserve amenity, including privacy and overlooking. Policy DMD10 sets out minimum separation distances between buildings, unless it can be demonstrated that the proposed development would not result in housing with inadequate daylight/sunlight or privacy.

9.5.20 The proposed siting, layout and detailed design of Blocks A, B and C in Phase 1 (with separation distances of generally 15 to 25m) ensure a good level of outlook for the proposed homes and the detailed relationship should ensure the privacy of occupiers.

9.5.21 Proposed Parameter Plan 006 (Development Plots – Minimum/Maximum Alignments would allow for Plots E and F to be 12.5m apart and for Blocks D and E to be 13m apart. These are relatively short separation distances for the scale of buildings proposed. However, the illustrative scheme demonstrates that an acceptable relationship between these Plots is possible and officers have secured revisions to the Design Code to limit the scope for facing projecting balconies in these areas. Other mandatory and advisory codes provide relevant guidance and officers are confident that these will help ensure acceptable relationships between homes in neighbouring Plots and with the detailed Blocks in Phase 1.

Daylight, Sunlight and Overshadowing

9.5.22 The submitted Internal Daylight, Sunlight and Overshadowing Report sets out the findings of an assessment of the proposed 'full' Phase 1 proposals and the illustrative 'outline' scheme for Phase 2 (rather than the proposed minimum building footprint and maximum height parameters).

- 9.5.23 All proposed habitable rooms up to the 13th floor were assessed for daylight. In terms of Average Daylight Factor (ADF), in Block A, 95% of all proposed habitable rooms would meet BRE guidelines. For Block B the figure was 92% and for Block C it was 94%. Similarly, high levels of compliance were found with respect of No Sky Line (NSL), with compliance with guidance being: Block A 94%; Block B 91%; and Block C 95%.
- 9.5.24 All main windows within 90° of due south were assessed of Average Potential Sunlight Hours (APSH). Given that not all Living Kitchen Dining or Living Rooms with multiple windows would be located due south, the results are presented on a rooms basis. The results show that 137 of the 237 (58 per cent) rooms assessed would be fully compliant with the BRE Guidelines. However, it should be noted that all tested rooms would be positioned either under a balcony or within a recess balcony. Higher levels would have been identified if sunlight on the front face of the balconies was assessed.
- 9.5.25 Given the 'outline' nature of this phase, Vertical Sky Component (VSC) has been used to help inform and test the proposed illustrative scheme and Parameters. The BRE Guide recommends that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations. The NPPF (Para. 118(c) advises that substantial weight should be given to the use of 'suitable brownfield land within settlements for homes...' and that LPAs should take 'a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site'. Paragraph 2.3.47 of the Mayor's Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. The applicants' have set VSC targets of 15% to 27%. Officers consider this to be reasonable.
- 9.5.26 The majority of the proposed homes would meet the applicants' target criteria. Areas that do not could be considered in greater detail at RMA stage and appropriate mitigation incorporated, including ensuring affected homes would be dual aspect, incorporating full height glazing and/or offset balconies. In terms of sunlight, the assessment found that all key facades facing within 90° of due south would either meet the national APSH target of 25% or demonstrate very good levels of sunlight. The proposed Design Code includes a number of relevant mandatory and advisory codes, including 'floor to ceiling heights', 'configuration of layouts' and 'façade openings and balconies.' Officers consider the results to be acceptable, subject to a planning condition securing a detailed daylight and sunlight assessment to accompany RMAs for Plots in Phase 2.
- 9.5.27 In terms of overshadowing of amenity spaces, BRE guidance recommends that at least 50% of the relevant area should receive at least two hours of sunlight on the 21st March. The assessment found that all key proposed amenity spaces (including children's play areas) within both phases would meet this target.

Noise

- 9.5.28 The NPPF (Para.180) makes clear that development should be appropriate for its location and that it should 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid

noise giving rise to significant adverse impacts on health and the quality of life’.

- 9.5.29 Published Plan Policy 7.15 seeks to separate noise generating uses from housing or ensure that there is appropriate mitigation where this is not possible, and minimise noise from development. Intend to Publish London Plan introduces the concept of ‘Agent of Change’ and Policy D14 sets out requirements to reduce, manage and mitigate noise to improve health and quality of life.
- 9.5.30 Local Plan Core Policy 32 seeks to minimise noise pollution. Local Plan Policy DMD 68 makes clear that development must be sensitively designed, managed and operated to reduce exposure to noise, highlighting building design, layout, positioning of building services, landscaping, sound insulation and hours of use.
- 9.5.31 The site currently suffers from significant road traffic noise from the A10 and A110 Southbury Road and is close to Strategic Industrial Land. The submitted Site Suitability Noise Assessment demonstrates that existing daytime and night-time background noise levels have informed the design of both the ‘full’ and ‘outline’ elements of the proposed scheme and that, with proposed mitigation measures in place, it would provide satisfactory noise levels inside homes. LBE Pollution officers have stated that this should be no higher than 35dB (A) from 7am-11pm in bedrooms, living rooms and dining rooms and 30 dB(A) in bedrooms from 11pm to 7.00am (LAeq, T), with the LAF Max not exceeding 45dB in bedrooms between 11pm and 7am more than 10 times per night. The scheme would also generally mean that external amenity spaces would generally meet relevant standards (≤ 55 dB LAeq, 16h), although noise levels of up to 60dB LAeq, 16h are predicted for a small number of residential balconies.
- 9.5.32 The proposed scheme achieves this by being designed to provide protection from noise created by the surrounding roads and land uses in the form of:
- Strategic massing to protect external amenity areas from noise, incorporation of internal residential amenity space and inclusion of recessed balconies facing the surrounding roads;
 - The Phase 1 ‘full’ Facades facing the surrounding roads incorporating suitable glazing and ventilation in order to provide appropriate internal residential amenity. This includes a sealed façade/glazing specification with a (mechanical) ventilation system used to mitigate noise and openable windows being used for purge ventilation only); and
 - The Design Code setting out suitable guidance for the design of Plots in Phase 2, including mandatory and advisory codes for ‘primary and secondary facades’ (3.2), ‘configuration of layouts’ (3.5) and ‘façade openings and balconies’ (3.21).
- 9.5.33 Officers consider that, with appropriate mitigation in place, the site is suitable for housing and that the proposed scheme would provide much needed high-quality homes. It is recommended that planning conditions secure the proposed glazing and ventilation mitigation referred to above. As such, the key relevant policies are satisfied.
- 9.5.34 Phase 1 includes flexible commercial units on the ground floor of Blocks A, B and C and it is recommended that a planning condition is used to secure adequate mitigation to prevent noise transmission between these units and

proposed flats above. It is also recommended that conditions limit the use of any café/restaurant/bar to 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays) and control noise from mechanical plant. The proposed Delivery and Servicing Plan, discussed in Section 9.8 should also help reduce noise associated with servicing the site.

- 9.5.35 This is a phased scheme and residents in earlier phase are susceptible to noise and the effects of additional construction traffic associated with the delivery of later phases. To mitigate this, it is recommended that planning conditions secure Construction Environmental Management Plans and Construction Logistics Plans for all Plots in Phase 2.

Air Quality

- 9.5.36 As discussed in Section 9.15, Chapter 7 of the ES finds that the air quality conditions for the site are predicted to comply with the Air Quality Strategy Objectives set for human health and that the site is suitable for housing. Nevertheless, proposed homes in Blocks or Plots next to A10 would need to include appropriate glazing and ventilation to mitigate against noise from road traffic and this would also mitigate against poor air quality.

- 9.5.37 Residents in earlier phase are susceptible to reduced air quality associated with the delivery of later phases. To mitigate this, it is recommended that planning conditions secure Construction Environmental Management Plans and Construction Logistics Plans for all Plots in Phase 2.

Summary of Residential Quality and Amenity

- 9.5.38 The orientation and layout of proposed homes is considered acceptable and it is hoped that a higher percentage of dual-aspect properties is delivered in Phase 2. All of the proposed homes would meet required internal (floorspace, layout, floor to ceiling heights etc.) standards and outdoor amenity space standards and the inclusion of some internalised amenity spaces is considered acceptable in this case. Subject to recommended conditions and s106 obligations, a good level and quality of play space is proposed, with the needs of older children being partially met offsite. Residents of the new homes would have acceptable levels of privacy, daylight and sunlight. Subject to recommended conditions, the proposed scheme should provide an acceptable internal noise and air quality residential environment and outdoor amenity space should be useable and pleasant.

9.6 Heritage

Relevant Legislation and Policy

- 9.6.1 Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 9, refer to setting. Section 16(2) states: 'In considering whether to grant listed building consent for any works the local planning authority or 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 historical interest which it possesses.' In addition, 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’.

- 9.6.2 Furthermore Section 72 states that, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. Although the site is not in the conservation area, the relationship to their setting is a consideration.
- 9.6.3 The Act does not require the preservation of the setting of listed buildings *per se*, which is confirmed by the *South Lakeland DC v Secretary of State for the Environment and another* (1992 House of Lords appeal), i.e. legislation “*does not in terms require that a development must perform a preserving or enhancing function.*” However, it places a statutory duty on decision makers to ensure that the special interest of a listed building is properly taken into account as a material consideration when determining an application affecting its special interest or setting.
- 9.6.4 The NPPF (para. 189) requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. The NPPF identifies three key factors local authorities should take into account in determining applications:
- The desirability of sustaining and enhancing the significance of Heritage Assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of Heritage Assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 9.6.5 The NPPF (para 193-202) categorises harm into three gradations: substantial harm, less than substantial harm and no harm. 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Harm could result from a heritage asset’s alteration or destruction, or from development within its setting.
- 9.6.6 The courts have held that any harm to heritage assets, even that which is deemed to be negligible, constitutes a material consideration, and thus paragraph 196 of the NPPF should be engaged.
- 9.6.7 Published London Plan Policies 7.8 is clear that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Intend to Publish London Plan Policy HC1 continues this approach and places emphasis on integrating heritage considerations early on in the design process.
- 9.6.8 Local Plan Core Policy 30 calls for maintaining and improving the quality of the built and open environment and Core Policy 31 seeks to proactively preserve and enhance all of the borough’s heritage assets. Local Plan Policy DMD 44 makes clear that applications for development which fail to conserve

and enhance the special interest, significance or setting of a heritage asset will be refused.

- 9.6.9 The principal guidance on managing change within the setting of heritage assets is set out in *The Setting of Heritage Assets: Historic Environment Good Practice in Planning Note 3 (Second Edition)*, Historic England, 2017.

Context

- 9.6.10 Built Heritage and Archaeology were scoped out of the Environmental Impact Assessment (EIA) as significant environmental effects were considered unlikely. Chapter 11 of the ES assesses the likely significant Townscape and Visual effects of the proposals and draws on the submitted Townscape and Visual Impact Assessment (TVIA). The submitted Heritage Statement sets out an assessment of the likely effects on Heritage Assets. Historic England has stated that it is not necessary for this application to be notified to them and has no comment. Historic England (Greater London Archaeological Advisory Service (GLAAS) has made no comment.

Site and setting – Heritage Statement assessment

- 9.6.11 There are no heritage assets within the site and the site does not lie within a conservation area. The submitted Heritage Statement considers heritage assets that are within a 1km (as the crow flies) radius of the boundaries of the site and describes their significance. The identified assets are as follows:

- Ripaults Factory, Southbury Road, Listed (Grade II);
- Church of St James, Hereford Road, Listed (Grade II);
- Queen Elisabeth Stadium, Donkey Lane, Listed (Grade II);
- Former Enfield Electrical Works, Ladysmith Road, Listed (Grade II);
- Enfield Technical College, Queensway, Listed (Grade II);
- Enfield Town Conservation Area;
- Bush Hill Park Conservation Area; and
- Southbury Railway Station, Locally Listed.

- 9.6.12 The likely effects on these assets as assessed in the Heritage Statement is considered in turn below.

- 9.6.13 Ripaults Factory. The submitted Heritage Statement concludes that the proposed scheme would barely be visible in the setting of this listed building and that the wider setting, which includes the site, does not contribute to its heritage significance. The asset is judged to be of medium sensitivity, the magnitude of impact to the setting as minor, the significance to be minor to moderate (not significant) and the effect as neutral.

- 9.6.14 Church of St James. The submitted Heritage Statement concludes that the proposed scheme is unlikely to be visible in the setting of this listed building and that the wider setting, which includes the site, does not contribute to its heritage significance. The asset is judged to be of medium sensitivity, the magnitude of impact on the setting to be negligible, the significance to be minor (not significant) and the effect as neutral.

- 9.6.15 Queen Elisabeth Stadium. The submitted Heritage Statement concludes that the proposed scheme is likely to be partially visible in the setting of this listed building, when standing in the running track, facing south east and that the

wider setting, which includes the site, is of mixed townscape quality and does not contribute to its heritage significance. The asset is judged to be of medium sensitivity, the magnitude of impact on the setting to be minor, the significance to be minor to moderate (not significant) and the effect as neutral.

- 9.6.16 Former Enfield Electrical Works. The submitted Heritage Statement concludes the proposed scheme is unlikely to be seen from the location of the listed building. Its immediate and wider setting do not contribute to its heritage significance. The asset is judged to be of medium sensitivity, the magnitude of the impact on the setting as negligible, the significance to be minor (not significant) and the effect as neutral.
- 9.6.17 Enfield Technical College. The submitted Heritage Statement concludes that the top parts of two of the buildings of the Proposed Scheme are likely to be visible from this location, as shown in the TVIA. The setting of this listed building does not contribute to its heritage significance and this will have no impact on the heritage significance of this HA. The asset is judged to be of medium sensitivity, the magnitude of impact to the setting as minor, the significance to be minor to moderate (not significant) and the effect as neutral.
- 9.6.18 Enfield Town Conservation Area. The submitted Heritage Statement concludes that the primary characteristics of special interest for this conservation area are: the medieval pattern; the watercourse (New River) creating a tranquil setting; the large number of listed buildings and buildings of historic interest; and the close relationship of open space with the built-up areas. It goes on to state that these characteristics would not be affected by the proposed scheme. The asset is judged to be of medium sensitivity, the magnitude of impact to the settings as minor, the significance to be minor to moderate (not significant) and the effect as neutral.
- 9.6.19 Bush Hill Park Conservation Area. The submitted Heritage Statement concludes that the trees along the street, along with the architectural style of buildings and the generous sizing of the plots, form a significant part of the character of the conservation area. It goes on to state that the proposed scheme is unlikely to be visible from much of the conservation area and that where visible it would not affect its character and will have no impact on its heritage significance. The asset is judged to be of medium sensitivity, the magnitude of impact to the setting as negligible, the significance to be minor (not significant) and the effect as neutral.
- 9.6.20 Southbury Station. The submitted Heritage Statement concludes that the immediate and wider setting of the station along Southbury Road does not contribute to its heritage significance. The Proposed Scheme will have no impact on its heritage significance. The asset is judged to be of low sensitivity, the magnitude of impact to the setting as medium, the significance to be minor to moderate (not significant) and the effect as neutral.

Site and setting – Assessment

- 9.6.21 Having taken account of the findings of the Heritage Statement, it is considered that the proposals would cause some harm to the setting of the Queen Elizabeth Stadium (Listed, Grade II), Ripaults Factory (Listed, Grade II) and Enfield Technical College (Listed, Grade II). The impact on the setting of the Queen Elizabeth Stadium is likely to be greater due to the open views afforded across the site. Views of the development from across the

running track, would impact on the setting of the listed building and the sense of openness. The harm to the Stadium is deemed to be at the lower end of 'less than substantial'. The settings of the former Ripaults Factory and the former Enfield Technical college would be impacted to a lesser degree, predominantly due to the former's positioning in relation to the site and the enclosed built up urban setting to the latter. The harm to the former Ripaults Factory and the former Enfield Technical College (Heron Hall) is deemed to be negligible.

- 9.6.22 In addition, it should be noted that TfL's request to widen the entrance at Southbury Station and install additional ticket barriers in response to the increased demand that this scheme would generate would directly affect this Locally Listed Building and would require a widening of the entrance by up to 2.5m. Any such works would be subject to planning permission and any impacts on the building would be assessed at that stage, in response to detailed proposals.
- 9.6.23 In addition to the heritage assets identified in the submitted Heritage Statement, the TVIA demonstrates that the proposed development would also be visible from conservation areas further afield, including Montagu Road Cemeteries and Forty Hill Conservation Area (including the Grade I Listed Forty Hall Estate).
- 9.6.24 Montagu Road Cemeteries Conservation Area. View 27 from Montagu Road Cemeteries Conservation (looking north west) the top floors of Building C would be seen. However, this is a distant view, which includes the 26-storey Mendip and Grampian Houses at Edmonton Green in the foreground, and no harm is identified.
- 9.6.25 Forty Hall Estate and Forty Hill Conservation Area. View 34 from the middle of a track west of Forty Hall Estate, within the grounds of Forty Hall (Listed Grade I) and within Fort Hill Conservation Area (looking south west) shows that the top floors of Building A and taller elements on Plots D, G and J in Phase 2 would be visible, particularly in winter months, when trees are not in leaf. The significance of the setting of Forty Hall (the *ferme ornee*, or *ornamental farm*, and the wider Estate) is outlined in the Forty Hill Conservation Area Character Appraisal (2015), the Forty Hill Conservation Area Management Proposals (2015), Forty Hall Park Management Plan (2007-2022) and the Forty Hall and Estate Conservation Management Plan (2007).
- 9.6.26 The TVIA assesses the effect on views from within the Forty Hall Estate as being beneficial in nature. Officers disagree with this assessment and have assessed the impact as amounting to the lower end of 'less than substantial harm'. It is acknowledged that the visibility of modern development does not necessarily equate to harm. However, in this case officers consider that it would result in a degree of harm to the significance of the *ferme orneé* and the curtilage listed summerhouse. The Forty Hall Management Plan acknowledges the importance of the park and gardens as a whole and describes them as being of national importance as an illustration of landscaping in the 18th century, due to their complete survival. The *ferme ornee* is of particular significance as it constitutes one of the earliest examples of such a rare landscape feature which maintains its original setting.

9.6.27 It is important to note that the Conservation Area boundaries were extended in 2008 to include the western part of the historic park, in recognition of its importance as a key part of the designed landscape and in an effort to create consistent landscape management policies for the whole of the designed landscape of Forty Hall. The landscape appears to be relatively unchanged from that which is shown on the 1773 sales plan. The plan clearly shows the raised walkways and summerhouses of the *ferme orneé*. The raised walkways and summerhouses were designed as vantage points from which the bucolic picturesque landscape could be viewed and explored (albeit from the safety of carefully laid out paths, unhindered by the dirty reality of farm life). The Council's Heritage Strategy SPD highlights the importance of securing long-term management proposals for the farm and the *ferme orneé*.

Conclusion on Built Heritage

9.6.28 Having carefully considered the proposals, including the submitted ES, TVIA and Heritage Statement, officers consider that the proposals would cause some harm to the setting of Queen Elisabeth Stadium (Listed, Grade II) and Forty Hall Estate (within the curtilage of the Grade 1 Listed Forty Hall). In both cases, the degree of harm is deemed to be at the lower end of 'less than substantial'. Officers also consider that there would be negligible harm to the setting of Ripaults Factory (Listed, Grade II) and Enfield Technical College (Listed, Grade II).

9.6.29 As such, taking account of the Council's statutory duty under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, paragraph 134 of the NPPF, the identified harm to heritage assets has been given significant weight and a balancing exercise against public benefit is required. The public benefits that the scheme would deliver can be summarised as follows:

- Regeneration – environmental, economic and social benefits (outlined below) within one of the most deprived areas (bottom 20% most deprived wards) in England;
- Optimising the site – making effective use of a relatively accessible, low density brown field site for a residential led-mixed use neighbourhood;
- Housing – on a brownfield, low-density use site, providing 444 homes in phase 1 and up to a further 1,356 homes in Phase 2, with a range of types (market for sale, market for rent, low cost rent and intermediate and a range of dwelling sizes and 10% + wheelchair accessible homes);
- Affordable housing – At least 35% affordable housing by habitable room in Phase 1 (38:62 London Affordable Rent: Shared Ownership), resulting in 38 London Affordable Rent and 88 Shared Ownership homes. Phase 2 would also include at least 35% affordable housing by habitable rooms, with the same tenure split. Based on the Illustrative Scheme and indicative dwelling mix, this would provide a further 96 London Affordable Rent and 255 Shared Ownership homes (Indicative overall affordable housing offer is 134 London Affordable Rent and 343 Shared Ownership);
- Jobs – 155 net additional FTE jobs in the construction phase and 140 net additional FTE jobs at the end user phase, with measures to help maximise local employment;
- Creating a piece of town – with well-designed buildings and routes improving pedestrian and cycle connectivity and creating a strong character in an area of poor townscape and connectivity;

- Additional publicly accessible open space – including a new urban piazza (the ‘Heart’) and two parks (the ‘Linear Park’ and ‘Meadows’) for use by occupiers of the area and those working in the nearby retail parks and industrial areas;
- New community facilities – including a children’s nursery and curated events space in Phase 1 and a potential health facility in Phase 2;
- A healthy development – which encourages active lifestyles and active travel, including better links to and through the site and improved connectivity with the surrounding area;
- Improved walking and cycling infrastructure to improve access to buses and Southbury Station and increased capacity of buses and/or improvements to Southbury station;
- Less road traffic - with a significant reduction in trips each day, with associated air quality and other benefits;
- A net increase in biodiversity – incorporating approx. 270 net additional trees, living roofs and walls and other urban greening and other opportunities for wildlife (including bird boxes, bat boxes and ‘insect hotels’); and
- Climate change benefits – an energy efficient development which would achieve ‘zero carbon’ development by connecting to the proposed District Heat Network (or providing on-site Air Source Heat Pumps) and funding off-site off-setting measures, optimisation of Sustainable Urban Drainage Systems and water saving measures and adherence to ‘circular economy’ principles.

9.6.30 Officers consider that the public benefits of the proposals, as summarised above, outweigh the ‘less than substantial harm’ that would be caused to the setting of the identified heritage assets.

Archaeology

9.6.31 The submitted Archaeological Desk notes that the western part of the site is within the Ermine Street Archaeological Priority Area. However, it reports that previous archaeological trial trench evaluation in 1995 revealed only 19th Century pottery and glass and concludes that in the unlikely event of any archaeological deposits remaining in situ, it is considered that they would, on the balance of probability, be of no more than local significance

9.7 Neighbouring Amenity

9.7.1 Published London Plan Policy 7.6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Intend to Publish London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

9.7.2 Local Plan Core Policy 30 seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Local Plan Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice

the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

Privacy, Overlooking & Outlook

- 9.7.3 Published London Plan Policy 7.6 makes clear that development should not cause unacceptable harm in relation to privacy. Intend to Publish London Plan D6 calls for high-quality housing and sets out a number of standards – including ensuring that site layout, orientation and design of homes and common spaces provides privacy for residents. The Mayor’s Housing SPG (2016) Standard 28 is reinforces the need for privacy, but cautions against adhering rigidly to minimum distance requirements.
- 9.7.4 Local Plan Policy DMD8 requires new development to preserve amenity, including privacy and overlooking. Policy DMD10 sets out minimum separation distances between buildings, unless it can be demonstrated that the proposed development would not result in housing with inadequate daylight/sunlight or privacy.
- 9.7.5 The proposed development would significantly improve the outlook for north facing homes in Southbury House (Nos. 280-286 Southbury Road) and the separation distances between it and Block B of between approx. 20 to 33m between facing habitable rooms would safeguard privacy. The approved five-storey residential building at No. 284 Southbury Road comprises bedrooms and kitchen windows on its northern elevation, with only one-bedroom window at ground level and its relationship with the proposed single-storey Block B plant room would be acceptable. On upper floors, the separation distance between habitable rooms in the proposed homes and Block B would be over 20m and would safeguard privacy. With Plot F in place, the proposals would also improve outlook from northern windows in the solicitor office building at No. 288 Southbury Road. As such, the proposed scheme would meet relevant policy and guidance.

Daylight/Sunlight/overshadowing

- 9.7.6 Chapter 10 of the ES sets out findings in to the likely significant effects on daylight and sunlight in the surrounding area. The surrounding area comprises mainly of ‘big-box’ retail, industrial, warehousing and office uses, with school, leisure and open space uses on the west side of the A10. However, there is housing to the south of the site and the assessment tested impact on the homes and permitted homes at Nos.287 to 305 (Odd) Southbury Road, and Southbury House. It also assessed impacts on Kingsmead School and overshadowing effects on King’s School and Enfield Playing Fields.
- 9.7.7 It should be noted that, unlike the daylight and sunlight assessment carried out for the scheme itself, which assessed the illustrative scheme for Phase 2, the ES models the maximum extent of building footprint and building heights set out in the proposed parameter plans, thus testing a worst-case scenario. The ES tests the likely significant effects of Phase 1 and then Phases 1 and 2 together. Officers’ assessment below is based on the scheme as a whole (Phases 1 and 2).
- 9.7.8 The applicants’ response to AECOM’s Review of the ES (July 2020) has taken account of the two schemes that have been granted planning

permission since the application was submitted (Nos. 292-308 Southbury Road and the Substation at No.284 Southbury Road) and concludes there would be no significant daylight or sunlight effects to these properties or in-combination effects.

- 9.7.9 The daylight assessment tested a total of 224 residential windows for Vertical Sky Component (VSC) and 135 rooms for No Sky Line (NSL).
- 9.8.10 The homes at Nos. 287 to 305 (Odd) Southbury Road would experience a 'negligible' adverse effect with the proposed development in place.
- 9.7.11 Homes on the upper floors of Southbury House are reported as being likely to experience a '*minor*' adverse effect. In terms of VSC, 3 of the 7 windows assessed would meet the BRE Guidelines. Of the remaining 4 windows, 3 would experience a loss of between 20% and 29.9% from the existing condition and 1 window would experience a loss in excess of 40%. However, these windows serve 2 open plan living kitchen diners that have multiple windows and very good access to daylight (both rooms would meet the NSL guidelines). Given the isolated shortfalls to windows that serve a room with multiple windows, the overall magnitude of change is considered to be small.
- 9.7.12 Homes at Southbury House are reported as being likely to experience '*moderate*' to '*major*' adverse effects. The VSC results show that 28 of the 149 windows assessed would meet the BRE Guidelines. Of the remaining 119 habitable room windows, 85 (over 71%) would demonstrate a retained VSC value of between 15.22% and 26.19%. Other windows would generally have retained VSC figures below this range. In terms of NSL, 45 of the 69 rooms assessed would meet the BRE guidelines. Recent appeal decisions in London have found that retained VSC figures of 15 and above are acceptable.
- 9.7.13 Kingsmead School is reported as being likely to experience a '*minor*' adverse effect. The VSC results show that 23 of the 35 windows assessed would meet the BRE Guidelines. The remaining 12 windows are likely to serve non-educational/classroom areas or retain very good VSC values.
- 9.7.14 The assessment tested 40 windows within 90° of due south. As the proposed scheme is to the north of existing housing, it is not surprising that all the 8 tested residential windows met the APSP target figures. In terms of Kingsmead School, 27 out of 29 windows tested would meet the guidelines
- 9.7.15 The assessment tested effects on three surrounding amenity areas – Kingsmead School Play Area South, Kingsmead School Play Area North and Enfield Playing Fields. This found only 'negligible' effects, with the three spaces continuing to experience 2 hours sunlight on March 21 on significantly more than the 50% of their area required by the BRE guidelines (Kingsmead School Play Area South unchanged at 99%, Kingsmead School Play Area North down from 98% to 97% and Enfield Playing Fields unchanged at 81%).

Conclusion of Daylight/Sunlight/Overshadowing

- 9.7.16 Existing buildings on the site and in the surrounding area are generally relatively low. Any proposed scheme with heights above the existing would be likely to have a significant effect on relative amount (percentage) of daylight and sunlight currently experienced from nearby homes and other sensitive

uses. However, fully optimising the housing potential of this site necessitates such relative decreases, given that officers consider that the absolute levels of daylight and sunlight that sensitive uses would be left with are satisfactory, when taking account of improved outlook referred to below.

Noise

- 9.7.17 Chapter 8 of the ES sets out findings into the likely significant effects on noise and vibration in the surrounding area. The proposed scheme includes a flexible range of non-residential uses. However, the recommended planning conditions for Phase 1 to control noise from these uses and mechanical plant to ensure an acceptable noise environment for proposed new residents, would also safeguard neighbouring existing residents. With such mitigation measures in place, the ES only identifies a 'minor' adverse operational noise effect from traffic using Baird Road and Dearsley Road.
- 9.7.18. Clearly, demolition and construction works would create noise and the ES identifies the need for Construction Environmental Management Plans and Construction Logistics Plans to mitigate these impacts and it is recommended that these are secured by planning condition. With these in place, the ES identifies generally 'negligible' adverse effects during the construction phase, although 'minor' adverse vibration and 'moderate' adverse noise (only during demolition) are identified in relation to homes in Southbury House. Following comments from Environmental Protection officers, it is also recommended that planning conditions control hours of work and the timing of deliveries in order to mitigate adverse impacts.

Conclusion of Neighbouring Amenity

- 9.7.19 There are relatively few residential neighbours, with all of them being located to the south, between the site and Southbury Road. The siting and massing Blocks A, B and C in Phase 1 would satisfactorily safeguard the amenity of residents in terms of privacy, daylight and sunlight, noise and air quality and improve the outlook from their homes.

9.8 Transportation, Access & Parking

- 9.8.1 Published London Plan Policy 6.1 seeks to support development that generates high levels of trips at locations with high levels of public transport accessibility. This policy also supports measures that encourage shifts to more sustainable modes and promotes walking by ensuring an improved urban realm. Policies 6.9 and 6.10 address cycling and walking, while Policy 6.13 sets car parking standards.
- 9.8.2 Intend to Publish London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.
- 9.8.3 Other key relevant published London Plan policies include:
- Policy 6.3 – which sets out an approach to assessing effects on capacity by transport assessments and calls for Construction Logistics Plans and Delivery and Servicing Plans and Travel Plans;

- Policy 6.7 – which seeks to ensure improvements to bus travel and other surface level public transport;
- Policy 6.11 – which requires smoothing out traffic flow and tackling congestion; and
- Policy 6.12 – which supports the need for limited improvements to the road network.

9.8.4 Other key relevant Intend to Publish London Plan policies include:

- Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
- Policy T3 – which requires new development to safeguard sufficient and suitable located land for public and active transport;
- Policy D13 – which requires promoters of housing close to noise generating uses (including transport facilities) to be deigned in accordance with Agent of Change principles
- Policy T4 – which calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and
- Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.

9.8.5 Local Plan Core Policies 24, 25 and 26 aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Local Plan DMD 45 makes clear that the Council aims to minimise car parking and to promote sustainable transport options. Local Plan NEEAP Policies 4.1, 4.2 AND 4.13 encourage modal shift away from car use and seek to improve walking, cycling and bus provision. Local Plan NEEAP Policy 16.1 seeks to improve access to and from and the environment around Southbury Station.

Trip generation

9.8.6 The submitted Transport Assessment includes an assessment of likely trip generation, using the industry standard TRICS database to identify comparable sites. This indicates that Phase 1 is likely to result in a reduction of 148 daily vehicular trips (over 6 vehicles per hour) and that Phase 2 is likely result in a further reduction of 61 daily vehicular trips (about 1 vehicle per hour). However, given the proposed changes in use, there would be a net increase in AM peak trips of approx. 150 trips which, given the site’s location at a junction of two primary routes, can be accommodated without significant strategic network impacts. Overall, officers do not consider that the proposed development would have a negative impact on the highway network in terms of vehicle trip generation.

9.8.7 The above reductions would be achieved by replacing the existing large-scale trip generating retail uses with mainly housing, with homes having limited car parking (0.2:1) (as compared to existing mode shares in the area), with a resultant targeted increase in the use of active and sustainable modes. In addition, the inclusion of on-site public realm, recreational space and community uses would reduce the need for new residents to travel away from

the site, meaning that a significant number of trips would be 'internal' and have a limited impact on the wider transport network.

- 9.8.8 The A10 (Great Cambridge Road) and A110 (Southbury Road) have very high traffic flows, with the local roads adjacent to the site showing much lower flows, albeit at levels that show they are still performing link functions in the local network. The Transport Assessment forecasts the change in traffic volumes as a result of the proposed scheme, compared with 2025 and 2038 baseline traffic flows. This shows an increase in traffic flows from 2025 to 2038 but, significantly, this increase would be lower with development in place (i.e. the scheme would lead to less traffic than the current uses). There would be a reduction in vehicle movements on some local roads, reflecting the removal of the high trip generating retail uses and its replacement by a low car use development.

Vehicular access

- 9.8.9 Principal road access to the site is currently from Dearsley Road which provides access to the existing car park, with servicing and delivery access from Baird Road. Both roads are subject to 30mph speed limits and are subject to waiting and loading controls for much of their length. Baird Road currently provides some uncontrolled kerbside space on the eastern kerb line. The Great Cambridge Road (A10) is subject to Red Route Clearway ('No Stopping') controls which also extend in to Southbury Road up to Southbury House. Traffic here is subject to a 40mph speed limit.
- 9.8.10 In terms of safety, whilst 405 collisions were recorded close to the site over a 5-year period (including 4 fatalities and 43 serious causing serious injuries), these must be seen in the context of proximity to a major junction on a primary road route with a 40mph speed limit. Collision data analysis has not highlighted any significant trends or clusters which can be directly associated with the current operation of the site.
- 9.8.11 For Phase 1, vehicular access would operate as a one-way system, with a temporary road constructed adjacent to the existing B&Q access on Baird Road. Vehicles would travel north, past proposed Block C and exit into the existing retail car park, where they would exit as per the existing car park arrangement onto Dearsley Road. The proposed 'Heart' area would be restricted to light servicing vehicles only, whilst the area located west of Block A alongside the A10, would be restricted to refuse access only.
- 9.8.12 For Phase 2, the temporary road would be removed and replaced by a building on Plot F. The vehicular access on Baird Road would be relocated approximately 25m north and operate in the same one-way westbound circulation, with vehicles exiting onto Baird Road via a new exit point. A two-way vehicle access from Dearsley Road would be used as an access for car parking and servicing vehicles only where required.
- 9.8.13 The proposed access arrangements are acceptable, subject to proposals to improve the existing public highway and the adoption of some areas as public highway and related commuted sums of money being secured by a Highways Agreement.

Pedestrian and cycle access

9.8.14 Pedestrian access for Phase 1 would be from Baird Road (enabling convenient access to and from Southbury Station), the corner of Southbury Road and Great Cambridge Road and from Great Cambridge Road. The proposed parameter plans and Design Code) allow for a network of pedestrian-friendly streets and spaces in Phase 2. This would greatly improve the permeability of the site and its connections with the surrounding area.

Delivery and Servicing

9.8.15 The submitted Delivery and Servicing Plan sets out the following key principles:

- The access to the Site would be controlled and therefore only booked deliveries will be able to enter the Site;
- All servicing activity would be managed to ensure efficient operation and to minimise arrivals and departures during busy periods. A site-wide booking system would be in operation to ensure delivery timing;
- There would be a centralised consolidation centre within the estate reception and local consolidation within blocks;
- Provision of designated and marked off-street loading areas close to building cores and access points, to assist with larger deliveries; and
- Emphasis on deliveries using smaller vehicles, with dwell times typically not exceeding 20 minutes, as part of the controlled access arrangement.

9.8.16 The Transport Assessment estimates that there would be approx. 158 daily service trips for Phase 1 and an additional 213 daily trips with Phase 2. Refuse and recycling storage areas would be located near to collection points, with management of the day-to-day arrangements provided by the onsite estate management team. It is recommended that details of the Delivery and Servicing Plan are secured by way of planning condition.

Car parking

9.8.17 Phase 1 would include 110 car parking spaces, with the majority of these (96) being within a temporary surface car park near Baird Road. This would provide a ratio of 0.25 spaces per home, which is in line with Intend to Publish London Plan Policy T6.1. It is proposed to initially provide 3% disabled parking provision and these would be mainly provided temporarily along the southern boundary of the existing northern car park. A further 7% of disabled parking bays could be provided within the existing car park, without further reducing spaces if demand requires. Non-residential parking would be restricted to 1 disabled parking space per unit. It should be noted that some of the temporary Phase 1 parking would not be located directly adjacent to the related blocks. However, seating to enable people to rest would be provided to mitigate this.

9.8.18 Given the 'Outline' nature of Phase 2, it is not possible to define the order in which Plots D to J would be brought forward. However, the applicants have committed to ensuring that space would be available across the wider site to suit each Plot. This would include the spare capacity in the existing car parking area (as the existing retail uses reduce), potential for temporary parking decks to provide temporary capacity, then allocations being made within completed Plots D to J as required. This would result in a phased reduction in the car parking ratio across the scheme as a whole to 0.2 spaces

per home, with no non-residential parking. This is in line with long-term mode shift targets set out in Intend to Publish London Plan Policy T1.

- 9.8.19 It is recommended that a Car Park Management Plan to manage the delivery and use of on-site car parking is secured by way of a planning condition.
- 9.8.20 Electric vehicle charging would be provided on the basis of 20% active and 80% passive with a mechanism for making the passive provision active. It is noted that there would not be passive provision in Phase 1, given the temporary nature of the parking areas, but that there would be the ability to provide additional active charging points if demand required. To compensate, in Phase 1 there would be a rapid charger provided for the use of vehicles servicing the site and it is recommended that this is secured by a s106 planning obligation.
- 9.8.21 To mitigate against possible overspill parking from the proposed development onto Baird Road, the applicant has committed to contributing to the cost of designing, consulting on and implementing parking controls. It is recommended that this is secured by way of a S106 planning obligation and that future residents would be prevented from obtaining a residents' parking permit (other than Blue Badge).

Car club provision:

- 9.8.22 The applicants have had initial discussions with a car club operator over introducing car club bays. The proposal is that 6 car club bays would be provided on Baird Road, for the benefit of the wider area. It is recommended that s106 planning obligations secure this, plus a contribution to cover the provision of one year of car club membership and driving credit for first occupiers of the new homes. Given Baird Road is a public highway, details of these arrangements would also be subject to a Highway Agreement.

Cycling:

- 9.8.23 The eastern footway of Great Cambridge Road (A10) provides a segregated cycle track past the site boundary. At the crossing point to the south-west corner of the site, the footway/cycleway is shared to facilitate crossing. There are a number of other cycle routes within the immediate vicinity of the site.
- 9.8.24 The Council has a longer-term aspiration to improve cycling facilities along Southbury Road including across the A10 junction, although there are some concerns about impact on the capacity of the A10/A110 junction. The increased permeability that would come from a full scheme would enable cyclists to travel through the site, thus avoiding the junction. In addition, the applicants' have agreed to make a financial contribution to support cycling improvements at the junction in the longer-term.
- 9.8.25 Cycle parking would be provided in line with the minimum standards in Intend to Publish London Plan Policy T5 (the illustrative scheme has 1,980 long stay and 53 short stay). These would include 5% of spaces which are accessible and make provision for adapted and large cycles. Given that some scheme details for Phase 1 could change, it is recommended that the final design and number of cycle parking spaces are secured by way of a planning condition. The details of cycle parking in phase 2 would be considered at Reserved Matters stage.

Active Travel Zones and Healthy Streets:

- 9.8.26 The Site is within walking distance (800m) of local facilities including a superstore, retail park and leisure facilities, including a cinema, swimming pool, gyms, local parks and schools (some involving crossing the A10). In accordance with Intend to Publish London Plan Policy T2, which requires developments to reduce the dominance of vehicles and deliver improvements that support the ten Healthy Streets Indicators, the submitted Transport Assessment includes an Active Travel Assessment. This identified four main routes: north to Enfield Playing Fields; east to Southbury Station; south to Lincoln Road and west to Enfield Town Station.
- 9.8.27 The assessment highlighted various issues and opportunities with four main interventions being proposed to reduce the severance effect of the A10 (which is highlighted in the Environmental Statement) and improve walking and cycling conditions:
- Improved active travel amenity across the A10/A110 Southbury Road signal junction, by reconfiguring the signal arrangement, to allow for a reduced pedestrian wait time and reduced pedestrian travel time through the junction when travelling east to west.
 - Enhanced route to Enfield Playing Fields, including a resurfacing of the length of the route to the access gate.
 - Improved pedestrian access and amenity at Southbury Station, including an improvement to the existing crossing.
 - Improvements to the carriageway (including resurfacing) and arrangement of both Dearsley Road and Baird Road, to provide a more pleasant and safe pedestrian environment. One of the key proposals involves the reconfiguration of the parking along Baird Road, to provide a consistent 2.0m footpath adjacent to the site, in addition to an enhanced public realm experience.
- 9.8.28 It is recommended that s106 planning obligations and a Highway Agreement (as necessary) secures financial contributions to deliver all of the above, plus walking and cycling improvements along the route to Southbury Station.
- 9.8.29 In addition, there may be scope in the future to revisit the A10/A110 Southbury junction in the context of the proposed development (including the loss of existing big box retail) and determine whether there is any scope to improve the junction further for pedestrians and cyclists.

Bus facilities

- 9.8.30 TfL has made clear that the existing bus stand on Dearsley Road should be protected and remain fully operational during both construction and operation of the scheme. Given that bus stands generate noise, proposed homes should be located and designed to take account of it, in accordance with the Agent of Change principle (Intend to Publish London Plan Policy D13). This is particularly relevant for the design of homes on Plots D, G and J in Phase 2 and is addressed in Section 9.4.
- 9.8.31 The applicants propose to relocate an existing bus stop on Baird Road, although the location is not specified at present. TfL has made clear that any relocation needs to be agreed with them, to help ensure that this does not

result in uneven spacing between stops. It is recommended that this is secured by way of a Highways Agreement.

Public transport capacity

- 8.8.32 The Site currently records a PTAL rating of 3 (i.e. 'Moderate'). A total of 6 bus routes directly serve the site via bus stops located on Baird Road and Southbury Road, all within a 400m walk distance in accordance with best practice (e.g. 'Buses in Urban Development Guidance' (CIHT, 2018).
- 9.8.33 Southbury Overground Station is located approximately 450m from the site and provides northbound and southbound services, towards both Hertfordshire and Central London respectively. There are twice-hourly services between Cheshunt and London Liverpool Street. In both cases the highway network is a significant barrier to pedestrian and cycling access to these facilities
- 9.8.34 A key component of the applicants' transport strategy is the promotion of public transport, especially bus use, as a viable alternative to the private car. As part of this strategy, the mode shares for buses, train and Underground, as derived from the 2011 Census data for the local area, would be increased:
- 9.8.35 Following discussions with TfL, there is the identified need for additional capacity on the No. 217 bus service. In addition, due to the forecast increase in rail passengers, TfL has identified the need to widen the entrance at Southbury Station by approx. 0.9m and provide an additional ticket gate in response to increased demand from Phase 1 and to widen the entrance by a further 1.5m and add a second ticket gate in relation to Phase 2.
- 9.8.36 Currently the Southbury Station works are still to be costed so the applicant has agreed to contribute £10,000 to a feasibility study and another £650,000 to support public transport related improvements, with TfL to determine how this is used. It is recommended that the bus and Southbury Station financial contributions are secured by s106 planning obligations.

Transport Hub and Travel Plan

- 9.8.37 The applicants have committed to providing a Transport Hub in Phase 1, Block C, where residents and users of the site would have access to pool bikes, car and cycle hire, bike repair tools, cycle training, as well as certain vouchers and discounts for public transport. The Transport Hub would also be able to provide up to date information and local knowledge, including live transport screens, as well as advising of other opportunities for sustainable travel uptake and sustainable travel initiatives such as cycle to work schemes or national walk to work day. This arrangement would also facilitate the development of new initiatives which build on future mobility advances to reduce the number of trips people make including by private car. It is recommended that the Transport Hub arrangements are secured by way of a s106 planning obligation, with any contributions not used to support delivery reverting to the Council for use on active travel projects in the area.
- 9.8.38 To support the Transport Hub, the applicants have submitted an outline Travel Plan, which includes targets for modal shift and it is recommended that this, as well as future Phase Travel Plans are secured by way of s106 planning obligations.

Construction traffic

- 9.8.39 The submitted Transport Assessment estimates that the construction of both Phases 1 and Plots in Phase 2 would require approx. 15 HGV movements (30 two-way) per day. The application is supported by an outline Construction Logistics Plan which meets the requirements of related TfL guidance. It is recommended that this, together with a Construction Environmental Management Plan (CEMP) are secured by way of a planning condition.

Conclusion on Transport

- 9.8.40 The applicants' ambition to meet the Intend to Publish London Plan Policy T1 target of 80% active and sustainable mode share by 2041, which is in excess of the local targets set for Enfield (69% by 2041), is supported. To achieve this and ensure that the scheme meets London-wide and local priorities in respect of safe, sustainable and active travel there would need to be a range of mitigation measures, secured by planning conditions and s106 planning obligations. These are referred to above and are summarised in Sections 2.4 and 11.3 of this report.

9.9 Water Resources, Flood Risk and Drainage

Flood Risk

- 9.9.1 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal erosion. Whilst the Environment Agency is responsible for developing a new national flood and coastal risk management strategy Lead Local Flood Authorities (LLFA), such as the Council will have overall responsibility for development of a Local Flood Risk Management Strategy for their area and for co-ordinating relevant bodies to manage local flood risks.
- 9.9.2 Published London Plan Policy 5.12 requires development to meet assessment and management requirements of the NPPF and (where necessary) pass the Sequential and Exceptions tests. Intend to Publish London Plan Policy SI 12 includes similar policy objectives. Local Plan Core Policy 28 notes that some areas in the North East Area Action Plan lie within Flood Zones 2 and 3a and these sites will need to comprehensively address flood risk.
- 9.9.3 Although in the eastern part of the borough, the site is located within Flood Zone 1 (low risk). Based on modelled flood levels, the submitted Flood Risk Assessment concludes that the site has a less than 1 in 1000 probability of river or sea flooding (low probability). In addition, the risk of sewer overloading is considered low.
- 9.9.4 As the site is located within Flood Zone 1, the sequential and exception tests do not apply to the proposals. The Finished Floor Level for the proposed basement in Phase 1, Block C (4.4 metres below ground level) would be above the level of ground water (5.22 metres below ground), so is acceptable. The Environment Agency raises no objections to the proposals.

Drainage

- 9.9.5 Published London Plan Policy 5.13 requires use of sustainable urban drainage systems (Suds) unless there are practical reasons for not doing so, achieve greenfield run-off rates and follow the Mayor's drainage hierarchy. Intend to Publish London Plan Policy SI 13 includes similar policy objectives and includes an updated drainage hierarchy. The Mayor of London Housing SPG (Standard 39) and Sustainable Design and Construction SPG are also relevant.
- 9.9.6 Local Plan Core Strategy Policy 28 makes clear that Suds will be required in all development, irrespective of the flood risk at individual sites. Local Plan Policy DMD 61 requires development proposals to demonstrate how they propose to manage surface water as close to its source as possible and follow the Mayor of London's drainage hierarchy. The policy also calls on Suds to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value. The Council has prepared a Suds Design and Evaluation Guide (2018).
- 9.9.7 The applicants have submitted a specific Below Ground Drainage Strategy for Phase 1 and drainage principles for Phase 2. The Strategy for both Phases is based on the Council's Suds guidance and seeks to restrict discharge from the whole site (Phases 1 and 2) to 17.8l/s (Qobar), which, given the hard surface/built nature of the existing site represents a reduction of approx. 98% in the existing surface water discharge rate.
- 9.9.8 The proposed primary source of attenuation is a combination of 'blue roof' and high-level podium attenuation across the four proposed buildings. Further attenuation would also be provided in the form of drainage channels and below ground cellular attenuation tanks, landscaping features such as rain gardens and permeable paving. Following comments by officers and the Mayor's Stage 1 Report, the Suds Strategy for Phase 1 has been revised by the submission of the Suds Design Note 28 July 2020. This commits to:
- Greater use of permeable paving;
 - Additional use of rain gardens and filter strips; and
 - The inclusion of a rainwater harvesting tank (approx. 13 cubic metres) to serve the Hub building (Block C).
- 9.9.9 The Phase 1 strategy is designed to accommodate 1 in 100-year storm + 40% climate change allowance and would drain surface water via a separate drainage network with an allowable discharge rate of 6.5l/s. The temporary car parking area would be drained separately to the rest of Phase 1, with attenuation provided in the form of both oversized pipes and a below ground attenuation tank. The temporary car park drainage network has been designed so that when the temporary car park is broken out, it would be possible to incorporate elements within the Phase 2 surface water design. It is recommended that details of Suds measures in Phase 1 are secured by way of a planning condition.
- 9.9.10 The submitted Masterplan, Below Ground Drainage Strategy is similar to that of Phase 1 and a detailed network would be designed to accommodate all storm events up to and including the 1 in 100 year + 40% climate change allowance.
- 9.9.11 In Phase 2, surface water would drain via gravity to the southeast corner of the site where a flow control device would restrict discharge prior to it entering the Thames Water surface water network in Baird Road. It is proposed that

surface water discharge from the Phase 2 is restricted to 7.5l/s. With this restriction in place, the volume of attenuation required is approx. 1,120 cubic metres. Plots D and E would be likely to drain separately to the remainder of the Phase 2 and would discharge via gravity into the existing surface water network on Baird Road to the east of the site. Surface water discharge from this plot is to be restricted to 4l/s which is to be controlled via a hydrobrake on a demarcation manhole prior to discharging from the site. The approximate volume of attenuation for Plots D and E is 610m³

9.9.12 The submitted Suds Design Note 28 July 2020 applies equally to this Phase and greater than originally proposed use of permeable paving, rain gardens and filter strips can be expected to be incorporated in to detailed designs. These would come forward at RMA stage. The Design Code includes advisory codes on Suds (6.17.2 and 16.7.3). It is recommended that details of Suds measures in Phase 1 are secured by way of a planning condition.

9.9.13 The above discussion addresses comments made by the Environment Agency and Thames Water (in relation to surface water). Thames Water is satisfied that there is an acceptable solution for foul water drainage and has not requested a condition. However, it has requested an informative with regards to underground water assets, which it is recommended to include.

Water infrastructure

9.9.14 The submitted Energy and Sustainability Report states that, in accordance with the optional requirement of Building Regulation Part G, the design of the proposed homes would aim to reduce average internal potable water consumption to 105 litres per person per day plus 5 litres per person per day for external use. It is recommended that this is secured by planning condition.

9.9.15 Thames Water has requested a condition in relation to water supply infrastructure and it is recommended that conditions require a Water Supply Infrastructure Study in relation to Phase 1 and individual Plots in Phase 2.

Conclusion of Water Resources, Flood Risk and Drainage

9.9.16 Flood risk is considered acceptable. Following revisions to the proposals and subject to the recommended conditions to reserve detailed design of SuDs features and to manage the use and supply of water, officers consider the water resources flood risk and drainage aspects of the scheme to be acceptable.

9.10 Climate Change

9.10.1 The NPPF (Para. 153) requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping.

9.10.2 Published London Plan Policy 5.2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); and Use Renewable Energy (Be Green) and Policy 5.6 sets a target to generate 25% of heat and power by local decentralised energy systems and establishes a hierarchy of connecting to an existing heating and cooling network.

- 9.10.3 Intend to Publish London Plan Policy SI2 adds Be Seen to the Mayor's energy hierarchy. It sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). Intend to Publish London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).
- 9.10.4 Local Plan Policy DMD Policy 51 calls for energy efficient buildings as the first step in applying the energy hierarchy, DPD Policy 52 requires connection to a decentralised energy network where possible, DMD Policy 53 requires the use of zero carbon green technologies and DMD Policy 54 requires financial contributions to off-set carbon where specific targets are not met. Local Plan NEEAP Policy 9.1 supports the development of a District Heat Network. The Council published the Enfield Climate Action Plan in July 2020.
- 9.10.5 Following comments in the Mayor of London's Stage 1 Report, the applicants' Energy Assessment and Sustainability Statement has been supplemented by an Energy and Sustainability Note (28 July 2010) and further points of clarification (September 2020). These set out a revised energy strategy based on a site-wide energy network connecting to the proposed District Heat Network, rather than the previously proposed use of Air Source Heat Pumps. However, this revised strategy is subject to agreement with Energetik on various technical and customer pricing details.
- 9.10.6 The applicants' Energy and Sustainability Note sets out how the three-step Energy Hierarchy in the published London Plan has been applied and estimates that site-wide regulated CO2 savings for the domestic element of the scheme would be approx. 85% over Part L Building Regulations and 2013 (significantly exceeding the target of 35%) and that the non-domestic element would achieve a reduction of approx. 45% (against a target of 35%).

Lean Energy Savings

- 9.10.7 The proposed energy efficiency measures include improved fabric 'U' and glazing 'g'-values, improved air tightness, minimising cold bridging, low energy lighting and high efficiency ventilation systems including Mechanical Ventilation with Heat Recovery (HVHR). Such measures are estimated to achieve an approx. 13% reduction in overall carbon emissions. Intend to Publish London Plan SI2 calls for residential development and non-residential development to aim to achieve 10% and 15% saving respectively from energy efficiency measures.

Clean Energy Savings

- 9.10.8 Following investigation, Energetik confirmed that the existing CHP driven Alma Road heat network and energy centre does not have sufficient capacity to supply the proposed scheme. However, it is proposed to connect to an extension to the Meridian Water heat network that is due to be served by the proposed Edmonton 'heat-from-waste' plant. The proposed scheme would

provide a site-wide heat network serving all parts of the development, fed by the district heat network running along Southbury Road and via a plant room located on the ground floor of Block B in Phase 1. Low carbon heat would feed individual Heat Interface Units (HIUs) within each home and non-domestic space to provide heating and generate domestic hot water instantaneously. The district heating would provide a further 69% improvement over Part L 2013 Building Regulations.

Green Energy Savings

9.10.9 The applicants have identified photovoltaics (PV) as the most suitable renewable energy technology, proposing an installation of PV array of approx. 600sqm on roof space on some roofs of all Plots in Phase 2. The PVs would provide a further 3% improvement over Part L 2013 Building Regulations. The Revised Design Code for the 'outline' Phase 2 includes mandatory and advisory codes in relation to roof plant and sustainability (living roofs and PVs) (3.7 and 6.19) and PV details would be approved at the RMA stage.

Energy strategy and monitoring

9.10.10 It is recommended that s106 planning obligations encourage the applicant to implement its preferred energy strategy of connecting to the planned Energetik DHN, but allows for the fallback strategy based on Air Source Heat Pumps, in the event that either legal agreements are not in place or connection cannot be guaranteed by a particular date.

9.10.11 The submitted Energy and Sustainability Report states that it is expected that smart meters will be provided throughout the redevelopment to enable occupiers to monitor and reduce their energy use. In accordance with Intend to Publish London Plan Policy SI 2, which introduces a fourth step 'Be Sean' to the Mayor of London's Energy hierarchy, it is recommended that a s106 planning obligation requires the applicants to submit data on energy use to the GLA, in accordance with the Mayor's 'Be seen' energy monitoring guidance' (currently pre-consultation guidance, April 2020).

Carbon Offsetting

9.10.12 Assuming connection to the proposed District Energy Network as planned, the remaining regulated carbon dioxide emissions for the proposed residential elements in Phase 1 to achieve 'zero carbon' (61 tonnes per annum) would be offset through a cash in lieu contribution to the Council. This would be ring fenced to secure delivery of carbon dioxide savings elsewhere. The Council's Planning Obligations SPD sets a price per tonne of carbon as £60 for a period of 30 years. Based on this, the required carbon offsetting contribution is £109,859.

9.10.13 If the fallback energy strategy of using Air Source Heat Pumps is adopted, there would be the need for a higher offset for Phase 1, based on 177.2 tonnes per annum for 30 years, which equates to £318,960. Any necessary carbon offsetting in relation to Phase 2 would be secured at RMA stage on a Plot by Plot basis.

Overheating

9.10.14 The proposed scheme has been assessed in accordance with the cooling hierarchy set out in published London Plan Policy 5.9 and the latest Energy Assessment Guidance, in order to reduce overheating and minimise the use of air conditioning. This found that the CIBSE compliance criteria would generally be met for the proposed homes through the use of natural ventilation via openable windows/doors and that active cooling would not be required. However, CIBSE compliance criteria would not be met for non-domestic areas and active cooling would be necessary.

Sustainability

9.10.15 The applicants' Energy and Sustainability Report sets out how the proposed development would address relevant policy objectives. The Revised Design Code for the 'outline' Phase 2 element also includes mandatory and advisory codes in relation to roof plant and sustainability (living roofs and PVs) (3.7 and 6.19) and sustainability (3.26). A number of specific conditions and s106 planning obligations are recommended under various report headings to secure these measures (see the Water Resources, Flood Risk and Drainage section above).

9.10.16 In accordance with Local Plan Policy DMD 50, BREEAM pre-assessments have been submitted in relation to the proposed non-residential space. These demonstrate that a minimum rating of 'Excellent' is achievable. This does not meet the aspiration to move to 'Outstanding' from 2016 onwards, but officers consider this to be acceptable. It is recommended that a planning condition requires compliance with the BREEAM 'Excellent' standard for the proposed non-residential space.

9.11 Biodiversity

9.11.1 The NPPF (Para. 170) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks.

9.11.2 Published London Plan Policy 7.19 makes clear that whenever possible development should make a positive contribution to the protection, enhancement, creation and management of biodiversity. Intend to Publish London Plan Policy GG2, G6 and G14 require development to protect and enhance designated nature conservation sites and local spaces, secure net biodiversity gains where possible and incorporate urban greening.

9.11.3 Core Policy 36 requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. DMD Policy 78 makes clear that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused.

The proposed development

9.11.4 The existing site comprises a harsh and hard environment, with little landscaping or tree cover and includes an area of Japanese Knotweed on its eastern edge. It offers very little in terms of biodiversity interest.

- 9.11.5 The proposed Phase 1 (the 'full' element) sets out detailed landscaping proposals for this part of the site. This includes open space planting providing a mosaic of habitats, native trees and shrubs, hedges, grassland and rain gardens. The submitted Preliminary Ecological Appraisal (PEA) reports that Phase 1 proposals would result in a 492% increase in biodiversity value from landscaping. The PEA recommends the provision of bat and bird boxes on new trees and the Design and Access Statement also proposes 'insect hotels.' It is recommended that these are secured by way of planning condition.
- 9.11.6 The illustrative scheme for Phase 2 (the 'outline' element) includes a Linear Park and The Meadows open space, landscaped streets and landscaped roof spaces, with lots of opportunity to significantly enhance the biodiversity value of the site – through landscaping and other features as Reserved Matters for landscaping and other matters are developed for the various Plots. The Revised Design Code identifies a healthy ecosystem that supports local biodiversity as a key principle for future landscaping and includes a mandatory Code calling for biodiverse roofs (6.19.2.2).

Epping Forest Special Area of Conservation

- 9.11.7 The site is approx. 3.4km to the west of the Epping Forest Special Area of Conservation (SAC) and is within the 3-6.2km Zone of Influence (ZOI) as defined by Natural England in their Interim Guidance (March 2019). The Epping Forest SAC is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value. Epping Forest SAC is also underpinned by a SSSI designation. Given this, it is necessary for Enfield as the competent authority to consider whether there are any likely significant effects on relevant sites pursuant to Section 63 (1) of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations").
- 9.11.8 Natural England initially objected to the application in relation to potential impacts on Epping Forest SAC. However following discussions with the applicants, an agreed package of measures have been agreed and as such Natural England have removed their objection. It is recommended that the agreed measures are secured by planning conditions and s106 planning obligations. These comprise the following:
- Low car ownership (limited car parking);
 - On-site green infrastructure including the Linear Park, The Meadow, The Heart and other hard/soft landscaped areas, delivering 2.3 ha of open/play/amenity space within the development and internal walks of 0.7km;
 - Improvements to local footpath network including improvements to footpaths and pedestrian crossing allowing better accessibility and permeability to Enfield Playing Fields;
 - £100,000 financial contribution to Enfield Playing Fields towards upgrade works within the park (a small proportion may improve targeted facilities for walkers, including dog walkers);
 - £111,000 financial contribution for "re-wilding" projects in Bush Hill Park/Enfield Playing Fields (based on approx. £60 per home/1,800 worst case); and

- Strategic Access Management Measures (SAMM) contributions totalling £25,2000 (based on £14 per home/reasonable 'worst case' 1,800 maximum number of homes).

9.11.9 Given the applicants' assessment, Natural England's response (raising no objection, subject to securing the identified avoidance and mitigation measures), and all other material considerations, officers consider that the development would not give rise to likely significant effects on European designated sites (including the Epping Forest SCA and the Lee Valley Special Protection Area (SPA) pursuant to Section 63 (1) of the Habitats Regulations. An integrity test is therefore not required.

9.12 Wind Microclimate

9.12.1 Published London Plan Policies 7.6 and 7.7 state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to wind and microclimate. This approach is reflected in Intend to Publish London Plan Policy D8.

9.12.2 Chapter 9 of the ES assesses the likely significant effects of the proposed scheme in relation to wind, using Computerised Fluid Dynamics (CFD) Simulation. This considered the site itself and adjoining areas within 500m, assessed three different scenarios (Baseline, Phase 1 and Phase 1/Phase 2) against the Lawson Criteria (which sets out different wind speeds suitable for different activities – including sitting, standing, 'leisure walking' and 'business walking'). Modelling excluded landscaping in order to test worst-case scenarios.

9.12.3 The assessment considered likely significant impact on 64 x 'sensitive receptors' at ground level. These include: Southbury House, Ismail & Co Solicitors, Unicorn Insurance Services, Graham Plumbers Merchant, Pure Gym, 287-303 Southbury Road, Southbury Leisure Centre, East West Commodities Ltd, Great Cambridge Road Bus Stop P, Southbury Road Bus Stop U, Baird Road Bus Stop H, Dearsley Road Bus Stop C, McDonald's, 287-303 Southbury Road (private gardens), Southbury Road footway, Great Cambridge Road footway. Various entrances and amenity spaces around the proposed scheme were also assessed. The assessment also assessed 31 x 'sensitive receptors' at upper terrace levels around the proposed scheme.

9.12.4 Following initial assessment, which identified a number of significant effects, appropriate secondary mitigation measures were incorporated in to the model. These comprised

- Phase 1 – proposed landscaping and increasing the height of proposed balustrades of a number of proposed balconies to 1.5m in height.
- Phase 2 – indicative landscaping and increasing the parapet to 2.5m solid height (details of which would be set out in detailed designs as part of RMA for individual Plots).

9.12.5 The assessment was then re-run, with the assumed mitigation in place. The results show that the existing wind environment of the site and the surrounding area is characterised by relatively calm wind conditions with insignificant seasonal variation, suitable for current uses in all seasons and safe for the general public

9.12.6 The proposed scheme is likely to modify the local wind environment and create both improvements and some localised wind acceleration potentially exceeding the recommended Lawson criteria at pedestrian and terrace levels. After adding secondary mitigation, all configurations were found to be safe for the general public and suitable for their intended use. Table 11 below identifies the residual effects and degree of significance.

Table 11: Summary of likely significant wind effects (Phase 1 and Phase 1 and Phase 2 combined)

Effect	Residual effect	Is the effect significant?
Pedestrian safety at pedestrian level within the site and surrounding areas	Negligible Adverse	No
Pedestrian safety at terrace levels accessible to residents within the site	Negligible Adverse	No
Pedestrian comfort at thoroughfares within the site and surrounding areas	Negligible Adverse	No
Pedestrian comfort at building entrances within the site and surrounding areas	Negligible Adverse	No
Pedestrian comfort at bus stops within the site and surrounding area.	Negligible Adverse	No
Pedestrian comfort at amenity spaces within the site	Negligible Adverse	No

9.12.7 Given the above, officers consider that the likely wind conditions that would result from the proposed scheme would be acceptable. However, it is recommended that planning conditions secure the secondary mitigation identified for Phase 1 (landscaping and balustrade heights). It is also recommended that RMA for individual to be accompanied by a detailed wind assessment.

9.13 Waste Storage

9.13.1 The NPPF refers to the importance of waste management and resource efficiency as an environmental objective.

9.13.2 Published London Plan Policies 5.17 and 5.18 and Intend to Publish London Plan Policy SI7 encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources. Intend to Publish London Plan Policy SI7 also requires referable schemes to promote circular economy outcomes and aim to achieve net zero-waste.

9.13.3 Local Plan Core Policy 22 encourages the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste. Local Plan Policy DMD 57 sets out detailed criteria and standards. The Council has also prepared Waste and Recycling Storage Planning Guidance.

9.13.4 The submitted Construction and Operational Waste Strategy sets out calculations for required residential waste space (general waste and recycling) for each Block in Phase 1, based on the Council's guidelines (4 x 1100L bins per 20 units for waste and 1 x 1280L bin per 20 units for recycling). This amounts to 112 Eurobins. Each proposed Block has a dedicated waste store within the building, accessible from the lift core and

located next to an internal road. Whilst some vehicle reversing may be required, this would be limited to no more than 12m). Bins would be wheeled out of the store on 'bin day' by estate management staff. Separate storage areas would be provided for commercial waste.

- 9.13.5 Waste and recycling stores in Plots E, H and J would be accessed via internal roads. Plot D and G would be accessed from the kerbside of Dearsley Road. Details would be agreed as part of RMAs. The Revised Design Code includes mandatory and advisory codes (6.6.2 and 6.6.3) to guide the detailed design of a refuse and servicing strategy for Plots within Phase 2.
- 9.13.6 The submitted Construction and Operational Waste Strategy commits to complying with the hierarchy of prevention, preparing for re-use, recycling, other recovery and disposal. It also commits to using Site Waste Management Plans (SWMPs) to help do this and it is recommended that these are secured by way of planning condition.
- 9.13.7 The submitted Waste and Circular Economy Statement demonstrates that the principles of circular economy have been incorporated in to the design process (whereby materials are retained in use at their highest value for as long as possible and then re-used or recycled, leaving a minimum of residual waste). Officers consider that the proposals accord with relevant policy and guidance relating to waste and the circular economy.

9.14 Contaminated Land

- 9.14.1 Published London Plan Policy 5.21 and Intend to Publish London Plan Policy D11 require appropriate measures to ensure that development on previously contaminated land does not activate or spread contamination. Local Plan Core Strategy Policies 32 and DMD 66 include similar objectives.
- 9.14.2 Chapter 12 of the ES provides an assessment on the impact of potentially contaminated soil and groundwater on the redevelopment of the site as well as the effects on ground conditions as a result of the proposed scheme and risks to (future) buildings and structures. Whilst it is reported that ground-based contamination from various sources is likely to be present, it identifies a number mitigation measures to ensure that this would be managed. It is recommended that these are secured by planning condition.

9.15 Air Quality

- 9.15.1 The NPPF (Para. 103) recognises that development proposals which promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 9.15.2 Published London Plan Policies 3.2, 5.3 and 7.14 and Intend to Publish London Plan Policy S11 state that development should (a) not lead to further deterioration of existing poor air quality; (b) not create new areas that exceed limits or delay the date at which compliance will be achieved; (c) not create unacceptable risk of high levels of exposure to poor air quality and (d) be at least air quality neutral. The Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG (2014) sets out relevant guidance

- 9.15.3 Local Plan Core Policy 32 seeks to improve air quality by reducing pollutant emissions and public exposure to pollution. Local Plan Policy DMD 65 requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 9.15.4 The whole borough has been declared an Air Quality Management Area (AQMA) and the A10/A110 Southbury Road junction has been identified by the Mayor of London as one of 187 Air Quality Focus Areas (locations that exceed the EU annual mean limit for NO₂ and have high human exposure. The findings of an air quality assessment are set out in Chapter 7 of the ES.

End User Phase

- 9.15.5 Chapter 7 of the ES sets out likely significant effects in relation to air quality. The ES reports on modelling for the future base years of 2025 (when Phase 1 is due to be completed) and 2038, when the whole scheme is expected to be built. This shows that with and without the proposed scheme in place, future air quality conditions are expected to improve through the replacement of older vehicles with newer vehicles as well as national incentives, such as the banning of sale of all diesel and petrol cars.
- 9.15.6 For the sensitive uses within the scheme itself, the air quality conditions are predicted to be below the Air Quality Strategy Objectives set for human health and therefore the ES concludes that the effect of introducing future residential uses to the site is not significant. Nevertheless, proposed homes in Blocks or Plots next to A10 would need to include appropriate glazing and ventilation to mitigate against noise from road traffic and this would also mitigate against poor air quality. This is particularly true for Block A, which is predicted to be within 5% of the national objective (at ground floor) and where London Councils' Air Quality and Planning Guidance (2007) recommends that 'appropriate mitigation must be considered e.g. Maximise distance from pollutant source, proven ventilation systems, parking considerations, winter gardens, internal layout considered, and internal pollutant emissions minimised'. Block A would be set back from the A10, homes would be set above non-residential ground and mezzanine levels, amenity space would be 'internalised' for some homes in Block A1 and it is recommended that details of glazing and ventilation details are reserved by condition. Whilst not included in the Assessment, the proposed tree and other planting between the A10 and buildings would also be likely to reduce concentrations at the façade of the building.
- 9.15.7 As discussed in the Transport section above, the proposed scheme has restrictive car parking provision and would result in a reduction in road traffic. The scheme would also incorporate a number of other air quality mitigation measures which would be secured by planning conditions or s106 planning obligations, namely: substantial cycle car parking, provision of Electric Vehicle Charging Points, Delivery and Servicing Plan and travel planning/monitoring. As discussed in Section 9.10 above (Energy and Sustainability), the revised energy strategy is based on connecting to a proposed Energetik District Heating Network or, as a fallback, using Air Source Heat Pumps. Neither would have a significant direct effect on air quality. The ES concludes that the residual effects on existing residents in the area and users of Kingsmead School would be insignificant.

- 9.15.8 The applicants' submitted Air Quality Neutral Assessment (AQNA). This concludes that whilst Phase 1 would be 'Air Quality Neutral' with regards to building emissions, it would not be in relation to transport emissions. However, the recommended conditions and s106 planning obligations referred to above would mitigate where possible. Given the lack of certainty on land use and quantum, the AQNA was not undertaken for Phase 2. It is recommended that a planning condition requires AQNAs for RMAs for all Plots in Phase 2.
- 9.15.9 Although odour was scoped-out of the EIA, it is recommended that ventilation details associated with any café/restaurant use in Phase 1 are secured by way of a planning condition to ensure that no adverse impacts associated with odour.

Construction Phase

- 9.15.10 The ES assumes that effects would be mitigated by way of a site -specific Construction Environmental Management Plan (CEMP). Taking account of comments by LBE Pollution officer comments, it is recommended that in addition to CEMPs, conditions relating to Non-Road Mobile Machinery (NRMM) and Construction Logistic Plans are secured for both Phases 1 and 2 by way of planning condition.

9.16 Socio-economics and Health

Jobs and employment

- 9.16.1 Intend to Publish London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-use phases.
- 9.16.2 Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 9.16.3 ES Chapter 13 (Socio-Economics and Human Health) assesses the likely significant effects in relation to operational employment, based on applying industry standard job densities, appropriate allowances for leakage and displacement and the application of local and regional level multipliers for both existing and proposed developments. This results in the following key findings:
- Existing uses provide 140 Full Time Equivalent (FTE) jobs;
 - Proposed uses would support 280 FTE jobs;
 - Uplift of 140 FTE jobs; and
 - Once factors such as leakage and multipliers are taken into account this would result in 130 additional FTE positions taken by borough residents (with approx. 60 FTE jobs by residents of Southbury Ward).
- 9.16.4 In addition, based on similar methodology in relation to operational jobs, the ES finds that building the proposed scheme would result in indirect and direct

employment in the order of 155 FTE jobs of which 70 FTE jobs are likely to be taken by residents of Southbury Ward.

9.16.5 To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that s106 planning obligations secure the following:

Local Labour (during demolition construction phases)

- Employment & Skills Strategy submitted and approved prior to commencement
- All reasonable endeavours to secure 25% of workforce
- Apprenticeships or trainees
- Local goods and materials

Employment & training

- Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets.
- Training opportunities
- Partnership working with local providers/programmes

Education

9.16.6 Published Plan Policy 3.18 and Intend to Publish London Plan Policy S3 seek to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand.

9.16.7 Local Plan Core Policy 8 supports and encourages provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. Local Plan NEEAP Policy 7.1 calls for community facilities to be improved to support both the existing and future population.

9.16.8 The applicants' Education Impact Assessment uses the GLA Population Calculator to estimate the likely number of early-years, primary and secondary-aged children, based on the reasonable 'worst case' maximum of 1,800 homes, the indicative dwelling mix and proposed affordable housing offer. This identifies the following need:

- Early-years – 298 (63 in Phase 1);
- Primary – 212 (44 in Phase1); and
- Secondary – 75 (14 in Phase 1)

9.16.9 Phase1 of the scheme includes the provision of a commercial creche/ children's nursery (288sqm GEA), which is large enough to cater for the expected demand in this phase. It is recommended that provision of this facility is secured by a s106 planning obligation. Phase 2 of the scheme provides further opportunities for commercial early years providers to establish additional facilities.

9.16.10The Education Impact Assessment considered a catchment area of 15 Primary schools within a 2-mile walking distance. However, officers do not consider it reasonable for children to be expected to walk 2 miles to school and to have to cross trunk roads, like the A10, and a more reasonable catchment that includes 6 primary schools has been agreed. Given current

surplus school places in this area and school-based projections that continue to show surplus spaces for LBE school planning areas 2 and 10 in the future, there is currently no need for additional primary school places. There is also no need to provide additional secondary school places for Phase 1

9.16.11 However, given that projections change and that the 'full' element of a permission would have a 3-year life, it is recommended that s106 planning obligations secure a review mechanism, whereby the need for financial contributions for primary school places only is reviewed upon commencement of Phase 1 (based on £1,299 per home, including BCIS inflation since 2017), derived from the Planning Obligations SPD figure of £2,535, but minus the proportion attributable to Early Years and Secondary school places).

9.16.12 In addition, given the uncertainty over numbers of primary-aged children in Phase 2 (where numbers, dwelling mix and tenure splits are currently unknown), it is also recommended that a review mechanism is secured whereby the need for additional primary and secondary school places and associated mitigation are reviewed at Reserved Matters stage on a Plot-by-Plot basis.

Health Impact

9.16.13 Adopted London Plan Policy 3.2 and Intend to Publish (para. 6.9.5) recognises that boroughs may require a Health Impact Assessment (HIA) and includes various policy objectives to help secure healthy new development. Enfield Core Policy 7 also calls for HIA.

9.16.14 The applicants' HIA sets out an assessment of the likely impacts on health (positive and negative) of the scheme, using the NHS London Healthy Urban Development Unit (HUDU) 'Rapid HIA Tool'. This focuses on a wide range of health determinants. The HIA concludes that the scheme would not result in any negative health impacts, but identifies a wide range of positive impacts. The most significant positive contributions of the Proposed Development are identified as:

- Actively supporting the 'Healthy Streets Approach';
- Incorporating innovative landscaping proposals; and
- Contributing to social cohesion and lifetime neighbourhoods.

9.16.15 In response to comments by Sports England, the applicants have submitted an 'Active Design Checklist' to set out how the proposed scheme meets the criteria and advice in Sports England's Active Design Guidance (2015) around the topics of 'activity for all', 'walkable communities', 'connected walking and cycling routes', 'co-location of community facilities', 'network of multifunctional open space', 'high quality streets and spaces', 'appropriate infrastructure', 'active buildings' and 'management, maintenance, monitoring and evaluation.' Sport England has welcomed the note.

9.16.16 Officers agree with the applicants' findings and agree that the scheme would have an overall significant beneficial impact on health and wellbeing (although see discussion on loss of the existing Buzz Bingo facility in the Equality Statement below).

Health Facilities

- 9.16.17 Published London Plan Policy 3.17 and Intend to Publish London Plan Policy S1 calls for inclusive social infrastructure that addresses a local or strategic need and that are easily accessible by public transport, cycling and walking – encouraging location in high streets and town centres. Local Plan Core Policy 7 makes clear that the Council will work with partners to deliver appropriate proposals for new health and social care facilities (prioritising the east of the borough). Local Plan NEEAP Policy 7.1 calls for community facilities to be improved to support both the existing and future population.
- 9.16.18 The applicants' Health Facilities Impact Assessment uses two different methods to estimate the likely residential population, based on the indicative dwelling mix and affordable housing offer. The GLA Population Calculator estimates at total of 3,643, whereas ONS data suggests a slightly higher figure of 3,700. The higher figure would generate the need for 2.1 FTE GPs based on the ratio of 1,800 patients per GP. In response, the proposed scheme makes provision for a health facility in Phase 2 of between 570 and 850sqm (2 and 3GPs respectively), to take account of the uncertainty in relation to the size of residential population of Phase 2.
- 9.16.19 Both Enfield Clinical Commissioning Group (CCG) and the Healthy Urban Development Unit (HUDU) have commented on the application and HUDU has corresponded further with the applicants. Between them they have challenged assumptions in relation to existing GP capacity and its ability to cope with increased demand from Phase 1, questioned the basis on which a shell and core health facility and confirmed the financial contribution that the HUDU 'Planning Contribution Model for London' requires to mitigate likely impacts (£2,556,450) (or £1,420 per unit) based on the reasonable 'worst case' maximum of 1,800 homes. They conclude by proposing that s106 planning obligations secure the provision of a 'healthcare delivery plan' which would either identify the need for an on-site health centre (including size, location, timing, design and specification) or trigger the option of a financial contribution in lieu of the facility.
- 9.16.20 The Council's Planning Obligations SPD calls for financial contributions to be calculated in accordance with HUDU's model. The applicants would prefer to make direct provision for a health facility in Phase 2 to help with place-making. As the CCG and HUDU want to keep options open and given this, officers recommend that s106 planning obligations are used to secure a flexible 'Healthcare Delivery Plan' that allows either for direct provision or financial contributions.

Sport & Leisure

- 9.16.21 Published London Plan Policy 3.19 and Intend to Publish London Plan Policy S5 calls for proposed sports and recreation facilities to be in accessible locations and well-connected with walking and cycling networks. Local Plan Core Policy 11 supports the improvement of Enfield Playing Fields and seeks to address the identified need for sports hall provision in the borough.
- 9.16.22 The area is relatively well-served by sport and leisure facilities. Enfield Playing Fields, immediately to the west of the A10, provides a number of facilities, including an outdoor gym, senior and junior football pitches, rugby pitches a baseball diamond and changing rooms. The Queen Elizabeth Stadium and associated athletics facilities are immediately to the north of the

Playing Fields and Southbury Leisure Centre (25m swimming pool, gym, sports halls etc) is to the south west.

9.16.23 Following discussion, the applicants are proposing to fund improvements to pedestrian crossing facilities to improve access from the site to the above facilities. It is also proposing a financial contribution of £100,000 to fund play provision for older children (12-years +) on the Playing Fields and to make good a shortfall of play space for this age group on the site itself. Officers recommend that the use of this funding be kept flexible, to allow for the safeguarding of existing pitches and appropriate play, youth and/or sports pitch provision in line with the Council's Sports Pitch Strategy and possibly targeted facilities for walkers, including dog walkers).

9.16.24 Notwithstanding this, Sport England has raised concerns that the proposed financial contribution is insufficient given the scale of the proposals and has referred to its Sports Calculator to help identify potential additional contributions. It is also concerned that provision of 'play space' on the Playing Fields could displace sports pitches. Enfield Ignations Rugby Club also considers the proposed financial contribution to be inadequate and call for a wider masterplan to determine needs and opportunities on the Fields.

9.16.25 Following discussion with Parks and Leisure officers and taking account of priority needs for sport in the area, the applicants have agreed to make an additional financial contribution of £118,500 to fund the refurbishment of the existing sports hall at Southbury Leisure Centre. Sport England remain concerned that the proposed contributions are inadequate to meet additional needs from the development. However, taking account of the proposed on-site provision of open space, existing provision and need and the objective of maximising affordable housing, officers consider that the combined £218,000 contribution towards play and sports facilities to be sufficient. The emerging Local Plan and Infrastructure Delivery Plan will consider the infrastructure needs associated with potential additional housing as part of any planned growth.

10.0 Equality Statement

10.1 Published London Plan Policy 3.1 and Intend to Publish London Plan Policy GG1 of the Mayor's Intend to Publish London Plan highlight the diverse nature of London's population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities.

10.2 More generally, the 2010 Equality Act places a duty on public bodies, including the Council, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

- 10.3. The Mayor of London's Stage 1 Report raises a specific potential equalities issue with respect to the proposed loss of the existing Buzz Bingo and The Slots Room, noting that bingo halls can provide a place of social inclusion for elderly persons or vulnerable groups and asks the Council to consider if an equalities impact assessment should be provided with the planning application to assess the impact of the development on persons who share a relevant protected characteristic. In its objection to the proposed scheme, Buzz Bingo also highlights that the loss of the facility, without its replacement, could have disproportionate adverse impact on parts of the community that rely on the bingo hall as a social outlet, namely older people and women.
- 10.4. There has been a large migration of bingo players on-line in recent years and land-based bingo as an activity has declined. Whilst commercial on-line bingo providers include some information on their websites about the profile of their customers, it is difficult to ascertain facts about land-based bingo.
- 10.5. A report by the University of Kent (The Bingo Project, 2012) reports that land-based bingo in England is especially popular with older, working class women. It quotes the Gambling Prevalence Survey (2010) which found that women were twice as likely to play bingo than men, with prevalence being highest amongst the oldest age-group (75+) (11%) and that it was the only gambling activity where participation was highest amongst those who were widowed.
- 10.6. In its objection to the proposed development, Buzz Bingo includes information on the profile of its customers at the Enfield Club. This notes that 71% of the customer base is female. In terms of age, based on the weighted number of admissions (number of customer visits) by age band, 64% of admissions or visits to the Club on an annual basis are aged 56-years and older.
- 10.7. The evidence available does suggest that the loss of the Buzz bingo facility would have a differential impact on particular protected characteristics, namely older women. In terms of opportunities to mitigate this impact, officers consider the most relevant aspects of the proposal to be the proposed events space in Phase 1 (which is intended to have a year-round events programme, to be managed by a site curator, who would work for an estate management company) and a proposed 'community café', which would overlook the events space. Both of these would be provided in Phase 1, before the existing Buzz Bingo is due to be lost. Officers recommend that s106 planning obligations be used to ensure that the site curator is charged with a specific requirement to identify and procure activities across the proposed scheme, including these spaces that are targeted at older women.
- 10.8. The land use planning policy issues relating to the proposed loss of this use are addressed in paras. 9.2.13 to 9.2.21.

11.0 S106 Heads of Terms

- 11.1 The NPPF requires that planning obligations must be:
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and,
 - (c) Fairly and reasonably related in scale and kind to the development.

- 11.2 Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.
- 11.3 The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. The Council's Infrastructure Funding Statement (2019/2020) sets out planned expenditure over the current reporting period (2020/21).
- 11.4 These are the Heads of Terms are proposed and includes the following monetary and non-monetary contributions:

1. Affordable housing:

- a. Minimum of 35% by habitable room in Phase 1 (382 habitable rooms)
- b. Minimum of 35% by habitable room in Phase 2, to be provided in accordance with an approved plot by plot affordable housing strategy
- c. Tenure mix Phase 1 – 32% London Affordable Rent and 68% Shared Ownership by habitable room.
- d. Tenure mix Phase 2 – As per Phase 1, with the aim of achieving 60% London Affordable Rent and 40% Shared Ownership (subject to Early, Mid & Late Stage Reviews) by habitable room.
- e. London Affordable Rent levels and Shared Ownership incomes below the London Plan Annual Monitoring Report upper threshold.
- f. Council priority option to purchase London Affordable Rent homes in Phase 1 (terms to be agreed) (LAR values to be capped at £229psft indexed at CPI).
- g. Quality standards
- h. Triggers for provision in both phases: No more than 45% of Market homes occupied until 50% of Affordable homes are delivered and no more than 75% of Market homes occupied until 100% of Affordable homes delivered), unless otherwise agreed with the LPA).
- i. Marketing of Shared Ownership homes – prioritising households that live or work in the Borough.
- j. All related communal open space and play space in a particular Block or Plot to be available to all residents (irrespective of tenure).

2. Viability Review Mechanisms:

- a. Early Stage Review (if no "substantial commencement" within 24 months).
- b. Mid Stage Review – prior to submission of Reserved Matters for the first Plot in Phase 2.
- c. Late Stage Review (Prior to 75% of private residential units being sold or let).
- d. Early, Mid and Late Stage Reviews capped at 35% Affordable Housing 60% London Affordable Rent and 40% Shared Ownership (by habitable room).

3. Breakeven GDV and Breakeven Costs:

- a. Breakeven GDV £792,406,243.
- b. Breakeven Cost £439,709,000.

4. Build to Rent requirements for Block A in Phase 1:

- a. 15-year minimum covenant.
- b. Clawback clause.
- c. Self-contained and let separately.
- d. Unified management and ownership.
- e. Tenancies of 3-years+ available to all.
- f. Rent and service charge certainty for the length of the tenancy.
- g. On-site management.
- h. Complaints service in place.
- i. No up-front charges etc.

5. Open space/public realm/play/sport:

- a. Public Art Strategy.
- b. Public access plan – ensuring public access to proposed streets and spaces (365 days, 24/7).
- c. Mechanisms to ensure the delivery and phasing of public realm and play space with the relevant RMA.
- d. Management & maintenance plan for public realm.
- e. Events curator to have a specific obligation to identify and procure events across the scheme targeted at older women.
- f. Provision of 1 x public drinking fountain in Phase 2.
- g. Financial contribution to fund improvements Enfield Playing Fields to provide off-site play activities for older children (11years+) (£100,000).
- h. Financial contribution towards improving sports hall at Southbury Leisure Centre (£118,500).

5. Epping Forest Special Area of Conservation (SAC) – Avoidance & Mitigation:

- a. £111,000 for re-wilding (Bush Hill Park/Enfield Playing Fields).
- b. £14per unit for SAMM (up to £25,200).

6. Transport - On-site Transport Hub and Car Club:

- a. Financial contribution of £225 per dwelling towards promoting sustainable travel, including pre-credited Oyster cards, Cycle and other equipment purchase, Car Club (see below), bike hire and cycle training.
- b. The £225 per dwelling allows for a total payment of £60,000 towards a car club, which covers installation costs for 6 on-street car club spaces on Baird Road. This payment provides 2 years free membership and will trigger an additional £48,000 contribution from Zipcar to provide equivalent to £30+VAT credit per dwelling. Also includes 1-year membership for commercial units on site.

7. Transport - Travel Plan and Travel Plan Monitoring:

- a. Travel Plan Monitoring fee of £2,500 for a Framework Travel Pan then £500 per year for the lifetime of the plan and £5,000 for each Phase Travel Plan.
- b. Appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives including TRICS compliant surveys across Phase 1 and all Plots in Phase 2.

8. Public transport improvements:

- a. £10,000 contribution towards feasibility study for mitigation works at Southbury Station to be paid on planning consent.
- b. £650,000 capped combined contribution for public transport mitigation to be paid to TFL for station enhancement of Southbury Station and bus network

enhancement (paid in two instalments, commencement of Phase 1 and commencement of Phase 2).

9. Pedestrian and cycle improvements:

- a. Improved pedestrian route and crossing facilities towards Enfield Playing Fields, including resurfacing.
- b. £100,000 contribution towards cycle route improvements in the vicinity of the site, including future route between A10/A110 junction and station.
- c. Improvements to pedestrian amenity around Southbury station, including provision of pedestrian crossing/raised table/road narrowing, formalising existing arrangement with additional cycle parking and integration with 'Transport Hub'.
- d. Increased pedestrian green time for crossing across the A10.

10. Car parking controls:

- a. £50,000 contribution for consultation, design and implementation of parking controls (including Traffic Management Order costs) to mitigate overspill parking and manage existing demand particularly on Baird Road and Dearsley Road (with any residual amount used on active travel initiatives).
- b. Occupiers of the development will not be permitted to obtain resident parking permits for any future controlled parking.

11. Electric Vehicle Charging – Rapid Charger:

- a. Electric Vehicle on-site 'rapid charger' for servicing vehicle use in Phase 1.

12. Highways Agreement

- a. Reconfiguration of car parking on Baird Road to allow for wider footway on western kerb, car club places, enhanced public realm, east to west permeability and carriageway resurfacing.
- b. Relocated and improved southbound bus stop on Baird Road, including additional bus cage capacity and new shelter.
- c. Dearsley Road improvements including enhanced public realm, enhanced footway provision and carriageway resurfacing.
- d. Subject to the agreement of the Highway Authority the adoption of areas of new highway along Dearsley Road and Baird Road and where required commuted sums for maintenance.

13. Energy:

- a. Prior to the commencement of Phase 1, submit an Energy Confirmation Statement, confirming either (i) that the site is to be connected to the proposed DHN or, if a connection is not deliverable (i.e. conditions precedent in the legal agreement with Energetik have not been achieved) that (ii) that the energy strategy for the site is to be based on ASHP.
- b. If (i), comply with submitted Energy and Sustainability Note (28 July 2020). If (ii) comply with and confirm the details set out in the Energy Assessment and Sustainability Strategy (27 February 2020).

14. Carbon Offsetting financial contribution:

- a. Phase 1 - If connection to DHN - £109,859. (61 tonnes per annum x £60 x 30).
- b. Phase 1 - If fall back ASHP - £318,960 (177.2 tonnes per annum x £60 X 30).
- c. Any necessary carbon offsetting for Phase 2 to be calculated on Plot by Plot basis.
- d. Sign up to GLA energy monitoring platform.

15. Health Care:

- a. Payment of £1,420 per dwelling in Phase 1 (£630,480) upon first occupation of Phase 1
- b. Prior to the submission of first RMA in Phase 2 and following consultation with the CCG, submit a 'Healthcare Delivery Plan' (i) identifying the location, timing, design and specification of a 570sqm 2x GP Healthcare Facility or (ii) make further financial payments (based on £1,420 per unit) on a Plot-by-Plot basis up to a maximum of £1,925,520.

16. Education:

- a. Phase 1: Provision of crèche (shell & core) addressing all on-site demand (in flexible D1/D2 floorspace in Phase 1).
- b. Phase 1 Review mechanism upon commencement of Phase 1: to establish the need for additional primary school places and any financial contribution for that Phase (Primary only).
- c. Phase 2: Review mechanism upon submission of RMAs on a Plot-by-Plot basis to establish the need for additional Early Years, Primary and/or Secondary school places and any financial contribution for that Plot (Early Years, Primary and Secondary).

17. Employment & Training:

- a. Local Labour (during construction phase)
- b. Employment & Skills Strategy submitted and approved prior to commencement of Phase 1 and each Plot in Phase 2 using reasonable endeavours to secure: (i). 25% of local workforce, (ii). 1 x apprentice or trainee for every £Xm contract value (figure to be agreed once formula agreed) (financial contribution to be provided if not possible formula to be agreed), (iii). Quarterly apprenticeship reporting & targets, (iv). Local goods and materials, and (v). partnership working with local providers/ programmes).

18. Other:

- a. Considerate Constructors Scheme.
- b. Design Review Panel – Requirement for future RMAs to be subject to a design review prior to submission.
- c. Retention of architects for Phase 1.
- d. LBE Management fee (maximum 5% of value of financial contributions).

12.0 Community Infrastructure Levy (CIL)

- 12.1 Both Enfield CIL and the Mayor of London CIL2 would be payable on this scheme to support the development of appropriate infrastructure. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved. Based on the Mayor and Council's Charging Schedules, the total level of CIL is expected to be in the order of £10,268,000 (based on the Illustrative Scheme, certain scheme assumptions, indexation assumptions and inclusion of social housing relief).

Table 12: CIL estimates (rounded)

	Phase 1	Phase 2	
Borough CIL	£1,203,080	£3,376,963	£4,580,042
Mayoral CIL2	£1,591,250	£4,097,219	£5,688,470

13.0 Conclusion

- 13.1.1 The proposed scheme is the product of extensive pre-application consultation and further refinement since the application was submitted. The 'hybrid' planning application seeks 'full' permission for Phase 1 (with all details submitted for approval at this stage) and 'outline' permission for Phase 2, a series of Plots that would come forward in sub-phases (development here would be controlled by the proposed Parameter Plans, Design Code and recommended conditions on minimum and maximum floorspace in different uses).
- 13.1.2 The North East Enfield Area Action Plan (2016) designates the site as a Retail Park. However, Policies SD7 and H1 in the more up-to-date Intend to Publish London Plan call for the mixed-use redevelopment of car parks and low-density retail parks and supermarkets.
- 13.1.3 The existing buildings that occupy the site have no architectural merit and detract for the appearance of the area. The phased comprehensive redevelopment of the site is acceptable in principle. Development plan policies enshrine a strong 'town centre first' principle and the loss of the existing retail and leisure uses is acceptable. The loss of the existing leisure use (Buzz Bingo) is also acceptable and the likely differential impact this would have on older women has been taken in to account and appropriate mitigation is recommended to be secured by s106 planning obligations. The proposed new business use is welcomed and would help ensure that there would be a net increase in jobs on the site, despite the significant net reduction in non-residential uses.
- 13.1.4 This is an accessible brown field site in relatively low density use and whilst high noise levels and poor air quality raise particular challenges, a housing-led mixed-use scheme is acceptable in principle. Given the nature of the application, the exact number of homes is uncertain at this stage. However, it would be likely to deliver between 1,587 and 1,800 homes.
- 13.1.5 There is a pressing need for housing, including affordable housing and the proposed scheme would make a significant contribution towards meeting Enfield's current London Plan target of 7,976 homes between 2015 and 2025 (798 per year) and the more challenging target of 12,460 between 2019/20 and 2028/29 (1,246 per year) in the Intend to Publish London Plan.
- 13.1.6 The proposed scheme would provide 35% affordable housing (by habitable room) and a tenure split of 38:62 London Affordable Rent: Shared Ownership, with the possibility of a higher percentage of London Affordable Rent, subject to the outcome of viability reviews. Based on the Illustrative Scheme and a 38:62 tenure split, the indicative overall affordable housing offer is 134 London Affordable Rent homes and 343 Shared Ownership homes.
- 13.1.7 This report carefully and comprehensively assesses the proposed scheme against adopted and emerging planning policy and guidance and takes account of all other relevant material considerations. These include the representatives made by local people in relation to loss of existing retail/leisure uses, the height of proposed buildings, the proposed density, lack of sufficient open space, impact on services etc.
- 13.1.8 The proposed scheme comprises Environmental Impact Assessment development and the Council is prohibited from granting planning permission without consideration of the 'environmental information' that comprises the

Environmental Statement, other information and any representations about the environmental effects of the proposed development. The findings of the Environmental Statement, other information and relevant representations are referred to where relevant throughout the report and necessary mitigations measures would be secured by the recommended conditions and s106 planning obligations. The residual adverse environmental effects are considered to be acceptable.

13.1.9 The proposed scheme responds well to the harsh environment around it and would safeguard existing industrial uses and bus infrastructure. It would also create a good 'internal' environment for new residents, optimising the amount of proposed open space, including active/playful streets and public realm and connect well with the surrounding area. Hard and soft landscaping would be of a high-quality, helping to create what should be a much greener, inclusive, safe, secure and attractive new place.

13.1.10 The proposed massing strategy based on a 'family' of building typologies with their different scales, features, articulation and rooflines and the use of a common palette of materials, should create a varied and distinctive character. Whilst some concerns remain regarding the particular heights proposed and the impact of the taller elements on Borough legibility, given the high-quality of their design, their roles as markers of a new neighbourhood on a key junction close to a station and the merits of the scheme as a whole, officers consider them to be acceptable.

13.1.11 The proposals would cause some harm to the setting of Queen Elisabeth Stadium (Listed, Grade II) and Forty Hall Estate (within the curtilage of the Grade 1 Listed Forty Hall). In both cases, the degree of harm is deemed to be at the lower end of 'less than substantial'. There would also be negligible harm to the setting of Ripaults Factory (Listed, Grade II) and Enfield Technical College (Listed, Grade II).

13.1.12 The proposed scheme would deliver substantial public benefits (economic, social, and environmental) that could not be achieved without the redevelopment of the site and these would outweigh the 'less than substantial harm' to the setting of a limited number of heritage assets.

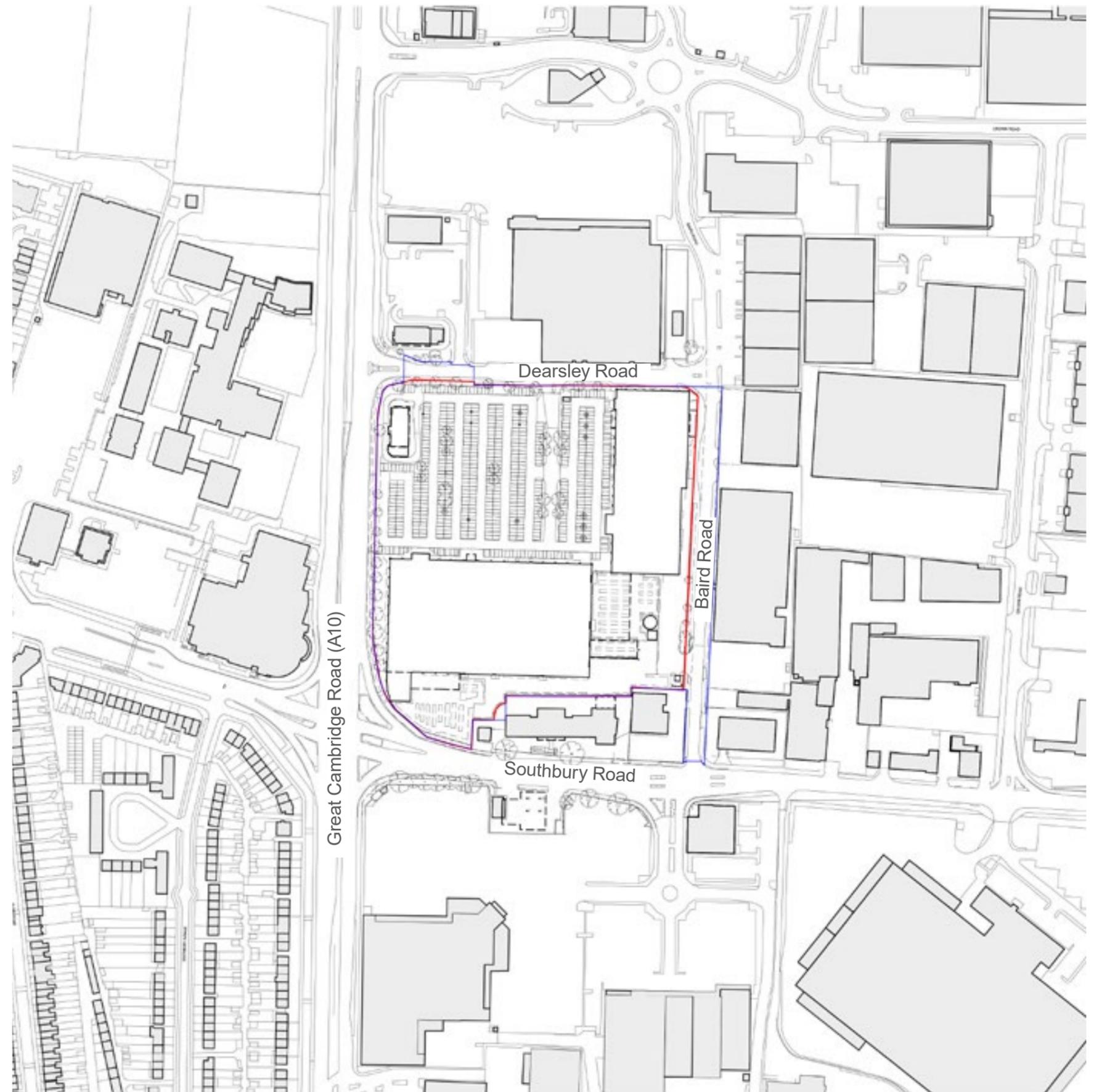
13.1.13 Overall, while the proposed scheme is not fully compliant with all policies, on balance, the proposal is considered to accord with the 'development plan' as a whole, and as such it benefits from the statutory presumption in favour of the development plan as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004. This policy support for the proposal is further reinforced by its compliance with important other material planning considerations, such as the Intend to Publish London Plan (which is close to adoption and has significant weight) and the NPPF.

13.1.14 Taking account of the above, the proposal is recommended for approval, subject to the recommended conditions and s106 planning obligations.

Appendix 1: Colosseum Retail Park Selection of Planning Application Drawings & Documents

This appendix sets out a selection of the submitted planning application material, as follows:

- Overall site location and site plans
- ‘Full’ element drawings – Selection of drawings, for approval;
- ‘Outline element – Selection of Parameter Plans and extract from Design Code, for approval; and
- Overall proposed scheme – Selection of assessment and illustrative material.

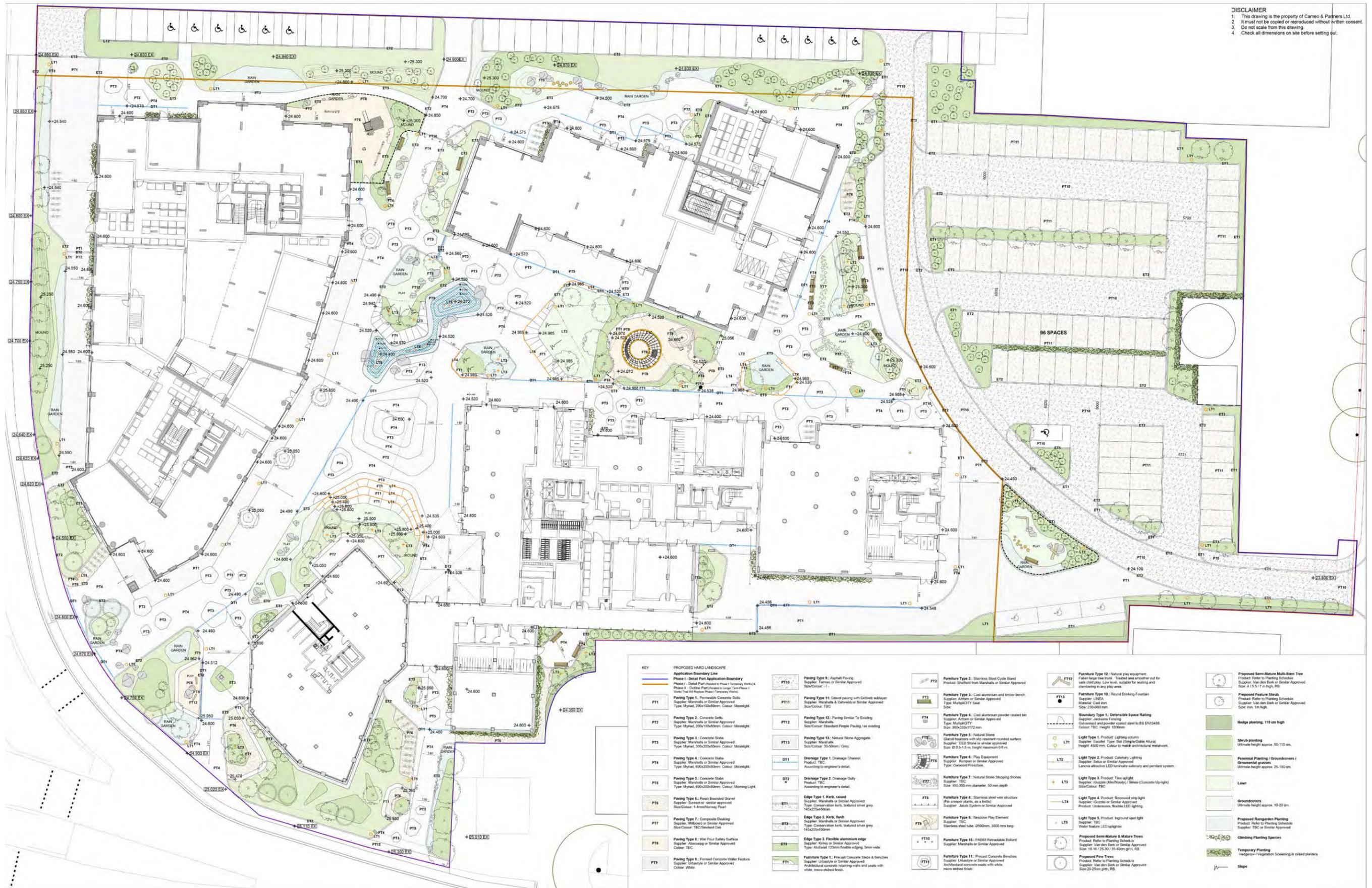


Site Location Plan



Site Plan – Site as Proposed – Layout Plan (for approval)

DISCLAIMER
 1. This drawing is the property of Cameo & Partners Ltd.
 2. It must not be copied or reproduced without written consent.
 3. Do not scale from this drawing.
 4. Check all dimensions on site before setting out.



Phase 1 – 'full' element – Ground floor and landscaping plan (for approval)



Phase 1 – ‘full’ element – North elevation (for approval)



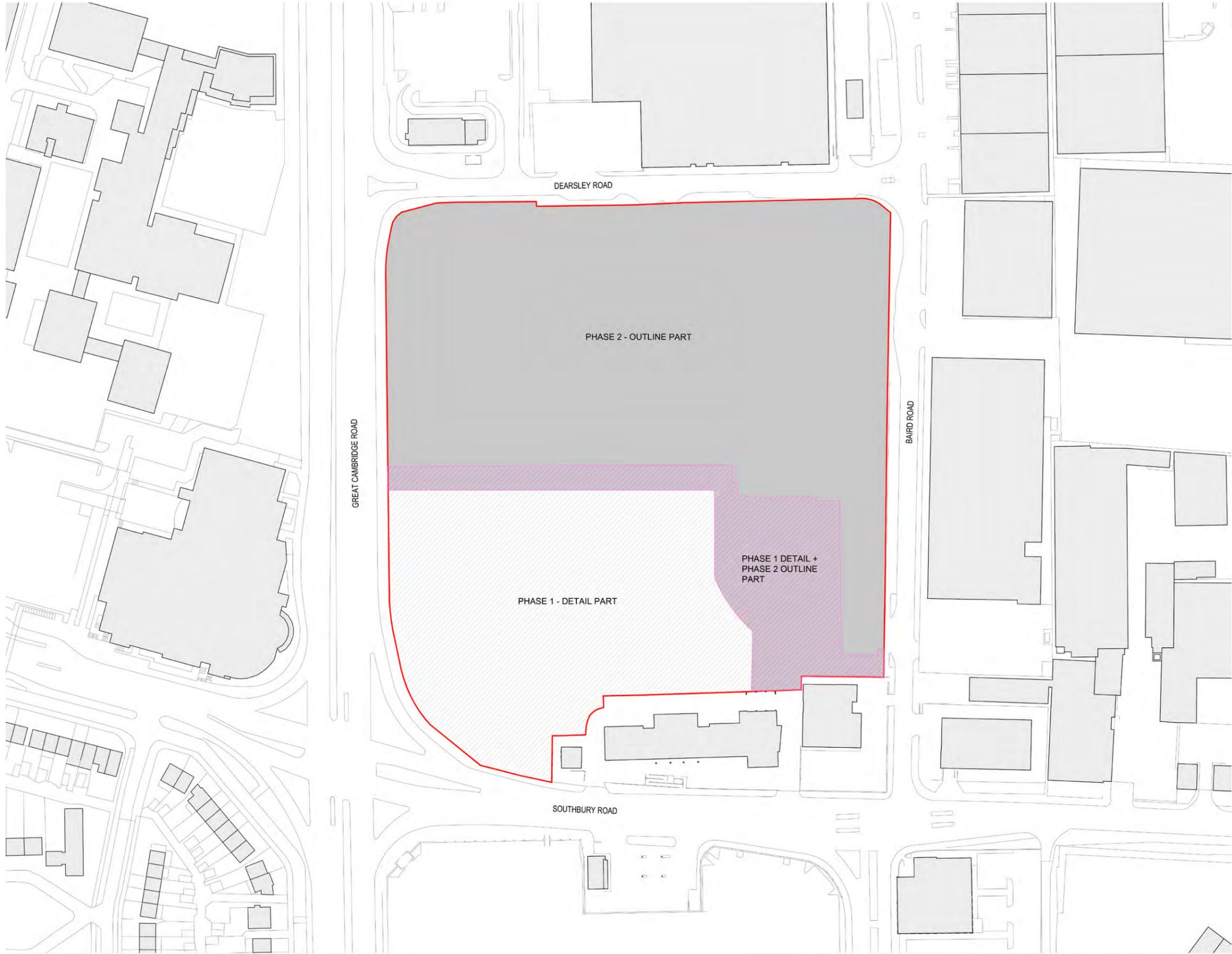
Phase 1 – ‘full’ element – East elevation (for approval)



Phase 1 – ‘full’ element – South elevation (for approval)



Phase 1 – 'full' element – West elevation (for approval)



Parameter Plan 002: Phase 1 Detail & Phase 2 Outline Application Parts (for approval)



Parameter Plan 003: Development Plots Ground Floor Land Use (for approval)

4.2 PLOT D CODES

4.2.1 Location & Description

- 4.2.1.1 Plot D marks the junction between Baird Road and Dearsley Road.
- 4.2.1.2 Plot D is bordered by a series of character areas each with its own language and attributes, see Fig. 101
- 4.2.1.3 Plot D parameter massing is divided into 3 sections: these sections vary in scale in order to respond to the character areas it addresses and ensure good daylight & sunlight within the scheme. The Plot's Northwest corner accommodates the opportunity for a Tall building to mark the site's Northeast entrance. Low-scale building elements should respond to the Plot's Southwest conditions.

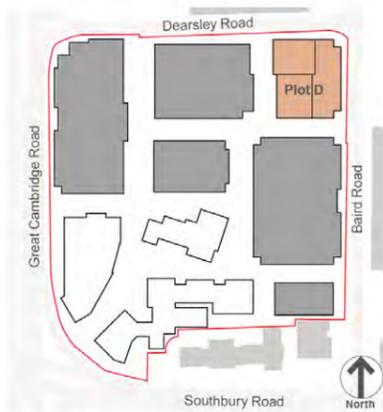


Fig. 99 Parameter Plot Location Plan

4.2.2 Maximum Parameters & Massing

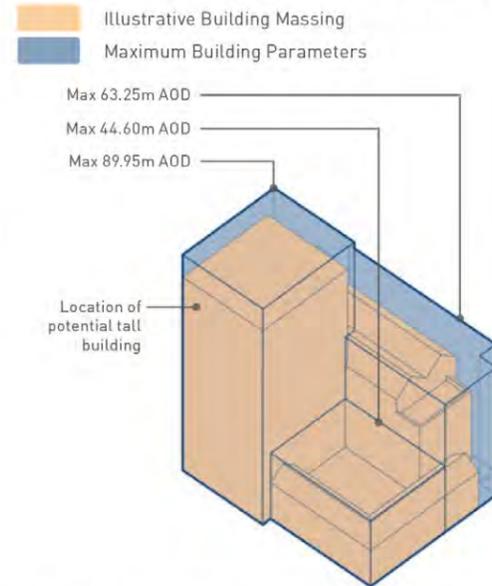


Fig. 100 Maximum Parameters

Mandatory Codes

Active Frontage

- 4.2.2.4 Vehicular access must be from either Dearsley Road or the 'Residential Street' located to the South and must not be located on building corners. Refer to Fig. 101.
- 4.2.2.5 Active Frontage, as defined in Fig. 101 and the Parameter Plans must be a minimum of 60% of linear frontage. Active uses include residential, commercial, leisure, healthcare and retail frontages.
- 4.2.2.6 *Justification: To create a dynamic and active ground level environment and avoids long stretches of blank facades. See section 3.23 "Activating the Ground Floor".*

4.2.3 Active Frontage, Access, Plot Setbacks and Balconies

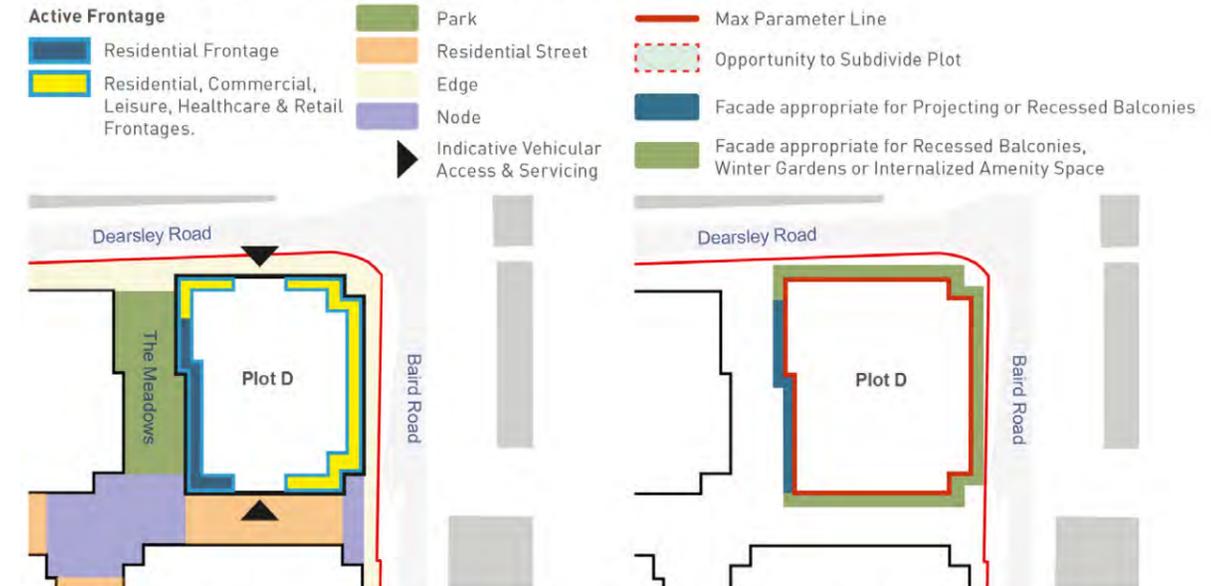


Fig. 101 Diagram showing Active Frontage & Access

Fig. 102 Diagram showing Plot Parameters and Balconies

Mandatory Codes

Frontage Relationship to Public Realm

- 4.2.3.1 The primary Eastern, Southern & Western frontages at ground level must be primarily residential with direct ground "level" access off of the public realm (i.e. street or park), Fig. 101.
 - 4.2.3.2 *Justification: In order to provide an active, friendly public realm appropriate for residential use.*
- ##### Plot Setbacks & Alignments
- 4.2.3.3 Each elevation of the Plot must have a minimum of one setback, which complies with "3.0 Site Wide Codes", Section 3.1 refer to Fig. 102
 - 4.2.3.4 Plot design must consider creating strategic alignments with the surrounding plots.
 - 4.2.3.5 *Justification: To reinforce "Node" character areas, see Fig. 101, through setbacks or notches at the corners of buildings and to sufficiently articulate building elevations. See "3.0 Site Wide Codes", Section 3.9.*

Balconies

- 4.2.3.6 Balcony design and hierarchy must comply with the "3.0 Site Wide Codes" in Section 3.21.

Advisory Codes

Frontage Relationship to Public Realm

- 4.2.3.7 Commercial, leisure, healthcare and retail may also be considered on the North and East frontages at ground level.
- ##### Balconies
- 4.2.3.8 Recessed balconies and internalized amenity space should be prioritized over projecting balconies on Dearsley and Baird Road elevations, see Fig. 102
 - 4.2.3.9 A mixture of recessed and projecting balconies should be implemented on the Western and Southern Elevations overlooking the Park and Residential Street respectively.
 - 4.2.3.10 *Justification: Hierarchy and placement of balconies must consider noise, wind, privacy and height conditions. "See 3.21 Balconies"*

Mandatory Codes

Maximum Parameters & Massing

- 4.2.2.1 The Northwest corner of Plot D provides the opportunity for a tall building. This must sit within the Maximum AOD shown in Fig. 100 (See Parameter Plan 007).
- 4.2.2.2 The Southwest and Southeast corner must respond and reinforce the adjacent "Node" character areas through the implementation of active frontage and setbacks shown in Fig. 101 (See Parameter Plan 003).
- 4.2.2.3 *Justification: To reinforce the design vision for the scheme and ensure the node spaces are active and dynamic spaces which encourages social interaction among the residents. See "3.0 Site Wide Codes", Section 3.9.*



Ground Floor Plan



Rooftop Plan

'Full' element (Phase 1) for approval and 'Outline' element (Phase 2) Illustrative only



Second Floor Plan - 'Full' element (Phase 1) for approval and 'Outline' element (Phase 2) Illustrative only



Accurate Visual Representation View 34 – Proposed ‘full’ and ‘outline’ elements Forth Hill Conservation Area (Winter) (Townscape & Visual Impact Assessment) (for information)



Computer Generated Image – Looking East Across The Heart (for information)



Computer Generated Image – Looking north from Southbury Road (for information)



Computer Generated Image – Looking South From Crown Road (for information)